

Criterion 1 – Impacts on the Species Under Assessment

Public comment guidance – Changes proposed in Criterion 1 are clarifications to the text which would not materially affect the outcome of assessments. In addition, we have proposed some changes to the Productivity and Susceptibility Analysis (PSA) that we use to determine the vulnerability of a species or population. This method is used to help guide our assessment of abundance in the absence of a formal stock assessment or where abundance is otherwise considered unknown. We have added more guidance and default scores for scoring the susceptibility attributes under the PSA, because our pilot testing indicated that more guidance was needed. In addition, we propose additional language and an additional factor in the PSA for consistency with what has been proposed in the salmonid standard. This language and additional factor were proposed for the salmonid standard in response to comments that the PSA approach (based largely on marine species) did not adequately capture the issues that affect salmonid vulnerability. We aim to keep the fisheries and salmonid standards as consistent as possible, therefore we tentatively propose adding the same language and factors to the fisheries standard; however, the final decision will be based on comments received both during this consultation period as well as during the consultation period for the salmonid standard. We have also highlighted a question for your consideration regarding the additional habitat factor, below. We welcome comments and suggestions on whether these additions are appropriate and whether alternative factors should be considered. Any changes will be made to both standards to ensure consistent vulnerability assessments across all species.

We are seeking comments on the PSA approach in a special section. For all other comments on Criterion 1, you may add your feedback below.

General comments on Criterion 1:

Productivity-Susceptibility Analysis:

Public comment guidance – We welcome comments and suggestions on whether the proposed additions to the PSA approach are appropriate and whether alternative factors should be considered. Any changes will be made to both standards to ensure consistent vulnerability assessments across all species.

In reviewing these potential changes, we ask you to consider these particular questions:

1. Do you have any concerns with edits to the PSA approach shown here?
2. Do you have any feedback as to whether it is more appropriate to consider “habitat quality” as proposed here under “susceptibility” attributes, or under “productivity”? We received some stakeholder feedback during the salmonid consultation that it would be more appropriate as a productivity attribute.

Comments on the PSA:

Criterion 2 – Impacts on Other Capture Species

Public comment guidance – There are two proposed changes in Criterion 2. One, the edits to the marine mammal bycatch guidance table, is for simplification and clarification only (there were rows and columns included in the table that were not needed for scoring purposes) and would not result in any scoring changes.

The other proposed change has to do with how fisheries are assessed when there are bycatch species that are known, but the stock status of the species is unknown (i.e. there are no stock assessments or data limited assessments). The version of the criteria that was accepted at the Multi-Stakeholder Group meeting in September 2015 included instructions similar to those proposed below, in that those species would be assessed using the Productivity-Susceptibility Analysis (PSA) as outlined in Criterion 1. However, over the course of the last eight months we have trialed a simplification that entails grouping these species by taxa and using the Unknown Bycatch Matrix (UBM) to score each taxa, rather than scoring species under the PSA. The goal of this simplification was to streamline the assessments, not to alter the outcomes (see Appendix 8 for more). However, there is some concern after trialing this method over the last eight months that it may result in more conservative/lower Seafood Watch scores than the PSA method. Therefore in the edits below, we propose returning to the method of using the PSA to score all known, but unassessed, bycatch species (excepting sea turtles, seabirds, marine mammals, and sharks, which are best assessed with the revised UBM, as the PSA is not calibrated for these species).

We are seeking comments on the use of the Unknown Bycatch Matrix vs. the Productivity-Susceptibility approach in a special section. For any other comments on Criterion 2, add your feedback below.

General feedback on Criterion 2:

Turtle Island Restoration Network, on behalf of its 200,000 members, requests Seafood Watch continue its use of the Unknown Bycatch Matrix (UBM) to score each taxa, rather than scoring species under the PSA. Returning to use of scoring under the PSA in response to potentially lowered scores is not aligned with the Monterey Bay Aquarium’s

commitment to inspire conservation of the oceans. Returning to an evaluation method that results in potentially inflated scores for fisheries with bycatch is contrary to Seafood Watch's definition of sustainable seafood, which maintains that wild-capture fisheries should ensure that the abundance of both targeted and incidentally caught species is maintained in the long term.

Turtle Island supports educating the public about how to make sustainable choices when deciding whether to consume seafood or what seafood to consume. Turtle Island Restoration Network is concerned that Seafood Watch ratings may encourage consumption of catch from some fisheries with substantially harmful environmental impacts. In particular, the drift gillnet fishery off California's coast ranks among the worst 20% of fisheries in the world terms of bycatch. (Kelleher, K. (2005). FAO Fisheries Technical Paper. No. 470) It is concerning that this fishery is rated as a "good alternative".

Making evaluation decisions based on maintaining high ratings furthers the risk that substantially harmful fisheries, like the drift gillnet fishery, will receive ratings as "good alternatives" instead of fisheries to avoid.

Turtle Island Restoration Network supports the added language clarifying that existing bycatch monitoring can be insufficient given potential bycatch impacts of the fishery.

Unassessed Bycatch Species (Use of Unknown Bycatch Matrix vs. Productivity-Susceptibility Analysis)

Public comment guidance – Text in tracked changed below outlines proposed changes to return to a method of using Productivity-Susceptibility Analysis for scoring bycatch species of unknown status.

We are particularly seeking input on these questions:

- 1) Do you have any feedback as to whether it is more appropriate to score fisheries with known bycatch composition, but unknown status of the bycatch species, using our Unknown Bycatch Matrix for taxon groups, or using Productivity-Susceptibility Analysis for each individual species?
- 2) Do you have any other suggestions or proposed edits to the language below?

Comments on the approach for unassessed bycatch species:

Turtle Island Restoration Network, on behalf of its 200,000 members believes it is more appropriate for Seafood Watch to use the Unknown Bycatch Matrix (UBM) to score each taxa, rather than scoring species under the PSA. Returning to use of scoring under the PSA in response to potentially lowered scores is not aligned with the Monterey Bay Aquarium’s commitment to inspire conservation of the oceans. Returning to an evaluation method that results in potentially inflated scores for fisheries with bycatch is contrary to Seafood Watch’s definition of sustainable seafood, which maintains that wild-capture fisheries should ensure that the abundance of both targeted and incidentally caught species is maintained in the long term.

Turtle Island supports educating the public about how to make sustainable choices when deciding whether to consume seafood or what seafood to consume. Turtle Island Restoration Network is concerned that Seafood Watch ratings may encourage consumption of catch from some fisheries with substantially harmful environmental impacts. In particular, the drift gillnet fishery off California’s coast ranks among the worst 20% of fisheries in the world terms of bycatch. (Kelleher, K. (2005). FAO Fisheries Technical Paper. No. 470) It is concerning that this fishery is rated as a “good alternative”.

Criterion 3 – Effectiveness of Fishery Management

Public comment guidance – Proposed edits in Criterion 3 are shown below in tracked changes and reflect clarifications only. They would not materially affect the outcome of any assessments.

Comments on proposed edits to Criterion 3:

Criterion 4 – Impacts on the Habitat and Ecosystem

Public comment guidance – Proposed edits in Criterion 4 are shown below in tracked changes and reflect clarifications only. They would not materially affect the outcome of any assessments.

Comments on proposed edits to Criterion 4:

Appendix 8: Document Revision History

Public comment guidance – Please see Appendix 8 to review the edits that were made earlier this year and provide any comments if desired.

Note that above we are considering revising the approach described under item 2, “Edits to guidance for assessing Criterion 2 species,” and please comment on that specific issue in the appropriate box above (“Unassessed bycatch species”).

Comments on edits made earlier this year:

Any other comments on this document: