



January 16, 2015

Mr. Santi Roberts
Program Manager
Monterey Bay Aquarium Seafood Watch
866 Cannery Row
Monterey, CA 93940

Re: Seafood Watch Standards Review

Dear Mr. Roberts,

On behalf of Strategic Earth Consulting, we are pleased to provide the following comments on the Monterey Bay Aquarium's Seafood Watch standards revision process (Public Consultation 1). Our team commends Seafood Watch for its ongoing efforts to assess the sustainability of fisheries and fish farms to inform consumer choices and a broad public audience. We recognize the monumental undertaking involved in developing and revising these comprehensive standards and criteria, and we thank you for the opportunity to provide our input at this time.

Strategic Earth specializes in developing effective ways to link science and policy with community outreach and engagement. Our multi-disciplinary, highly collaborative approach focuses on opening lines of communication and works to include diverse perspectives as an integral part of science-based environmental policy and decision-making processes. We have reviewed the proposed standards/criteria revisions through a "lens" that values the expertise a range of credible sources can bring to science-based protocols. In our experience, educational tools are most effective when they are grounded in sound science and further informed by additional types of experiential knowledge. This integration of a range of expertise builds the credibility of, and confidence in, such valuable tools as a fishery consumer guide.

Strategic Earth proposes the following three key recommendations for your consideration:

1. Integrate a Holistic Approach to Assessing Fisheries;
2. Design a Clearer Pathway to Improve Fishery Scores; and
3. Multi-stakeholder group composition improvements.

1. Integrate a Holistic Approach to Assessing Fisheries

The Seafood Watch criteria for wild-caught and farmed fisheries focuses solely on factors used to inform and understand the ecological sustainability of each fishery/system. Seafood Watch acknowledges that socioeconomic factors are not considered as part of its criteria, however notes the value and importance of social and economic related costs and benefits. **We strongly recommend Seafood Watch make stronger connections between ecological, social, and economic factors that influence a fishery.**

A healthy, vibrant fishery extends beyond the condition of the resource and considers the people and markets that contribute to a fishery's viability. Correlations between social and economic factors and

the ecological sustainability of a fishery are well documented¹. Changing markets, access to fishing grounds, costs of materials and fuel, and even the economic implications of natural disasters can have strong influences on catch volume (i.e. fishing mortality), and can also help inform projections related to the long-term productivity of a fishery. For example, in recent years, international markets have heavily influenced shifts in fishing mortality across a number of high-valued California fisheries (e.g., California spiny lobster, Dungeness crab, market squid). Economists and fishermen agree that any shifts in the international demand would influence the business models of many California fisheries. Without Seafood Watch considering the role of these international markets, a large part of the “sustainability story” is missing. Although “Criterion 1 – Impacts on the Species Under Assessment, Factor 1.3 – Fishing Mortality” as outlined in the Criteria for Fisheries can potentially capture some of these trends, landings data and fish counts alone cannot fully account for how economic changes may impact a fishery.

It is also important to highlight that fishermen themselves do not view social, economic, and ecological factors as separate and operate their businesses, for the most part, considering all three equally. By removing, or diminishing, the socioeconomic discussion, Seafood Watch is inadvertently omitting areas of most importance and priority to fishermen. We believe fishermen would gain a greater understanding of—and trust in—Seafood Watch criteria if the inherent relationship across these three disciplines was more thoroughly considered. In short, **Seafood Watch would begin to “speak a shared language” with members of the fishing industry, which in turn could help strengthen the credibility of the Seafood Watch program across target audiences.**

While recommended, we understand including economic and social variables as part of the Seafood Watch criteria may be challenging. **As an initial step, we encourage Seafood Watch to provide improved attention and access to socioeconomic references/resources as part of each report. This will help illustrate the rich relationship between ecosystem sustainability and the social and economic health and viability of those communities that directly rely on these fisheries. Additionally, we recommend including both social and economic experts who understand fishery dynamics to be part of the Seafood Watch Multi-Stakeholder Group** (see recommendation #3 for additional details). Seafood Watch has an opportunity—and responsibility—to demonstrate the benefits of evaluating a fishery from a holistic perspective. This will help to the public gain a more comprehensive understanding of what the multi-faceted factors that are influencing a fishery’s sustainability.

¹ Reyers, B, Roux, DJ, O'Farrell, PJ. 2010. Can ecosystem services lead ecology on a transdisciplinary pathway?. ENVIRONMENTAL CONSERVATION 37(4): 501-511

Sisaye, S. 2011. Ecological systems approaches to sustainability and organizational development Emerging trends in environmental and social accounting reporting systems. LEADERSHIP & ORGANIZATION DEVELOPMENT JOURNAL 32(3-4): 379-398

Wang, S, Fu, BJ, Wei, YP, Lyle, C. 2013. Ecosystem services management: an integrated approach. CURRENT OPINION IN ENVIRONMENTAL SUSTAINABILITY. 5(1): 11-15

2. Design a Clearer Pathway to Improve Fishery Scores

Most, if not all, fishermen are invested in the economic and ecological future of the fishing industry. We have witnessed frustration from these same fishermen who are looking for clear ways to improve their fishery's Seafood Watch score. **Currently, Seafood Watch criteria fail to clearly explain how fisheries can improve their overall assessment scores.** Having worked as a fisheries analyst for Seafood Watch, our team understands the factors that influence a score are complex. However, without a straightforward pathway outlined for how to improve a score, members of the fishing industry are left with limited guidelines for how to adjust their operations to help minimize negative ecological (and economic) impacts.

This issue is made further challenging as Seafood Watch revises its evaluation criteria. For example, in 2014 California Dungeness crab was downgraded from a "best choice" to a "good alternative." As administrators of the California Dungeness Crab Task Force (DCTF), our team was privy to the clear, understandable rationale Seafood Watch shared regarding the reasons for the downgrade of the fishery. What was missing from the conversation, however, was information on how the Dungeness crab fishery could work to improve their score. Upon further discussion with Seafood Watch, we learned that simply improving one factor that influenced the downgrade (whale entanglements) would not be sufficient to upgrade the fishery back to a "best choice". It is in these circumstances that Seafood Watch could offer additional details, such as improved management measures (e.g., updated stock assessments), that could lead a fishery to enhance its operations with the goal to better its Seafood Watch score.

Strategic Earth recommends a summary section accompany each assessment outlining the criteria and factors that require improvement to upgrade a Seafood Watch score. By illustrating a clear path to improving a Seafood Watch score, this in turn will help promote sustainable fishing practices, improve fisheries management and coordination, raise the overall stewardship of ocean resources, and further support the mission of the Monterey Bay Aquarium, which is to "inspire conservation of the oceans."

3. Multi-Stakeholder Group Improvements

Strategic Earth applauds Seafood Watch for employing an open and transparent review process that encourages the public to comment on the revised and developing standards. This process, as we understand it, will be complimented by additional review from two decision-making entities: the Technical Advisory Committees (TACs) and the Multi-Stakeholder Group (MSG). Our experience shows adopting this type of collaborative approach can help increase public support and buy-in for your end product (i.e., fishery consumer guides). **Strategic Earth recommends, however, that Seafood Watch make clearer the composition of the MSG as outlined in the Seafood Watch stakeholder map. This is especially true regarding those representatives with strong ties to marine resources and inherent knowledge of ocean systems.**

As detailed in "*Fisheries and Aquaculture Standards Revision Public Summary (Revision Cycle 2014-2016)*", the MSG's anticipated composition includes "Seafood Business" and "Seafood Industry". Additional detail is provided to show these categories include retailers, suppliers, distributors, producers, and associations. **Strategic Earth recommends Seafood Watch include**



“fishermen” as a necessary addition to one or both of these categories. While fishermen may be implied within “producers” or “associations”, most fishermen do not self-identify in this way. Clearly and directly identifying fishermen as a specific group will ensure the MSG’s composition includes the valuable perspective and knowledge that fishermen can provide to the Seafood Watch review process. Without this additional perspective involved, Seafood Watch may miss large parts of the “sustainability story”. It may also be important to acknowledge that fishermen may not have applied for the recent solicitation of MSG membership due to this omission and/or oversight in how the categories are currently defined.

As noted above, **Strategic Earth also recommends the MSG contain experts in both social science and economics who understand fishery dynamics and who have worked directly with fishermen.** This additional expertise will help to ensure the interpretation of the Seafood Watch standards is considered through multiple lenses, and support a more thorough interpretation of sustainability.

Strategic Earth Consulting would like to thank Seafood Watch for the opportunity to share our recommendations on how to further strengthen the Seafood Watch standards and evaluation process. Our team is confident Seafood Watch will continue to be a leader in seafood assessments, thanks in great part to the scientifically rigorous and transparent foundation on which the standards are developed and the reports are written. We trust a more holistic approach to the fisheries assessments, the development of a clearer pathway to improve Seafood Watch scores, and improvements in the multi-stakeholder group composition will help to secure the long-term success of Seafood Watch program.

Please do not hesitate to contact us with any questions you may have regarding our comments. Thank you in advance for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Rachelle Fisher".

Rachelle Fisher
Senior Associate
Strategic Earth Consulting, LLC

A handwritten signature in black ink, appearing to read "Kelly Sayce".

Kelly Sayce
Principal
Strategic Earth Consulting, LLC