

Monterey Bay Aquarium Seafood Watch®

Seafood Watch® Standard for Salmon Fisheries

Public comment period – 3: Comment Form

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Public Comment Guidance:

Salmonid fisheries are significantly different to typical wild-capture fisheries and have some unique characteristics. In order to ensure that Seafood Watch assessments consider these unique characteristics and the conservation concerns associated with these fisheries we have developed a modified set of criteria for assessing salmon fisheries. One of the major considerations within this set of criteria is the impacts of supplementation from artificial production which is widely used throughout salmonid fisheries across the globe.

This document is the comment form for the second draft of the Seafood Watch Criteria for Salmon Fisheries which can be found [here](#). Please use this document to comment on the salmon specific guidance and scoring identified in [blue text](#).

Criterion 1 – Impacts on the Species Under Assessment

Public comment guidance – During the second public comment period we received comments regarding the appropriateness of MSY-based reference points for salmonid populations for the purposes of determining sustainable populations. An alternative option that we have considered is using Minimum Viable Populations, or Viable Salmonid Populations, which are developed particularly for salmonid populations that are listed under the Endangered Species Act. We have been unable to identify a way of relating MVP-based targets to the MSY-based targets used by fishery managers, and in order to allow effective assessment and ensure consistency with other Seafood Watch assessments we have decided to retain our guidance with respect to MSY-based reference points. We have also considered that it is most likely that concerns about achieving MVP are greatest for ESA listed populations which are already considered a High Concern for abundance using the draft methodology.

We welcome thoughts and suggestions of how MVP-based assessments could be used and scored in a Seafood Watch assessment.

We have made some changes to the Productivity and Susceptibility Analysis 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 used the PSA that was accepted as part of the Seafood Watch Standard for Fisheries and added a factor for susceptibility. This is in response to comments received during the second public comment period that traditional PSAs do not accurately reflect the vulnerability of salmonids. The changes to the PSA will also be subjected to a public comment period later in 2016 as part of an interim review of the Seafood Watch Standard for Fisheries. Any changes will be made to both standards to ensure consistent vulnerability assessments across all species.

We welcome comments and suggestions on whether these additions are appropriate and whether alternative factors should be considered.

Comments:

While some salmon stocks may have MSY based escapement/harvest objectives, many do not. Most salmon fisheries are mixed stock fisheries and many are limited based on either exploitation rate or harvest rate limits to various weak stock components in these fisheries. Some more terminal fisheries also are managed based on escapement goals. Not all stocks have escapement goals as the fisheries are simply based on harvest rates. Many fisheries especially marine salmon fisheries share their allowed exploitation rate limits with other commercial and recreational fisheries. The actual impact of a particular fishery on a particular weak stock may vary based on annual allocation decisions between fisheries as much as specific management rules tied to that fishery. Mixed stock fisheries often have incidental impacts to a wide variety of weak stocks some of which may be stocks which originate a long distance from the fishery in question. For instance, the South East Alaskan troll fisheries have impacts on a variety of weak Puget Sound and Columbia River stocks as well as abundant

hatchery runs from these and other areas. Any particular fishery is very unlikely to by it self be able to exert an unacceptably high level of mortality on any particular population. The combination of all fisheries could in total have an unacceptably high level or mortality, but fishery management rules are designed to avoid this. More and more fisheries are moving towards abundance based management using exploitation or harvest rates. The allowed rates may also change and go up and down as abundance goes up and down. All salmon fisheries are trying to catch abundant hatchery and sometimes abundant wild fish that occur in these fisheries, but they tend to all have some impact on (often many) weak stocks that also occur in that fishery. Because impact limits will be based on the weak stocks, salmon fisheries typically have lower impacts on the stronger components than these components can support. I think that most any kind of assessment of a fishery's impact on its target stocks is going to show that the fishery is sustainable. A more important question would be the total fishery impacts on weak or ESA listed stocks. But to assess this, it would be necessary to look at the total fishery impacts for all fisheries that have measurable impacts on that stock. If the total fishery impact on a stock were determined to be too high, you wouldn't be able to really place the "blame" on any particular fishery, but would have to rate all fisheries that impacted this stock accordingly. For ESA listed stocks, NMFS already has to go through a process of determining an acceptable harvest impact for that stock and provides incidental take limits so the fisheries can legally proceed under the requirements of the ESA. If Seafood Watch were to be of the opinion that impact rates determined through ESA consultation are sustainable, then an assessment of any fishery could be simplified to look at whether or not a fishery is being managed to stay within in its allowed limits. If Seafood Watch were of the opinion that ESA based impact rates are not necessarily sustainable, then by implication, only a relatively small number commercial salmon fisheries could be considered sustainable because the suite of fisheries that impact ESA listed stocks are managed to stay just within the ESA harvest limits.

I do not think assessing fisheries based on any kind of MVP standard is really going to improve the assessments. For ESA listed salmon populations, the primary factors limiting abundance and recovery are usually not fishery related. Things like habitat loss and dam construction and other non-fishing factors are generally the main reasons for both the stock decline as well as the limiting factors for recovery. If a population were below its MVP goal, fishing and the allowed fishing rate may have very little ability to solve this. It may be that other non-fishing actions are needed. Salmon recovery involves many types of actions both in controlling fishing and resolving other non-fishing impacts. If NMFS has determined through ESA consultations fishing rates that are compatible with recovery efforts, then fisheries should be viewed as sustainable.

Criterion 2 – Impacts on Other Capture Species

Criterion 2 will be assessed according to guidance set forth in the Criteria for Fisheries.

Criterion 3 – Effectiveness of Fishery Management

Criterion 3 will be assessed according to guidance set forth in the Criteria for Fisheries.

Criterion 4 – Impacts on the Habitat and Ecosystem

Criterion 4 will be assessed according to guidance set forth in the Criteria for Fisheries.

Criterion 5 X – Impact of Artificial Production

Public Comment Guidance for Criterion 5

Criterion 5X is an exceptional Criterion which is to be assessed only where there is artificial production associated with stocks that are caught and retained within the fishery under assessment.

Previously the assessment of these factors had been combined with the corresponding factors within the fisheries standard; however it was clear that this was preventing the concerns associated with a particular operation from being clearly identified. For example, a well-managed fishery associated with poorly managed hatcheries may receive a moderately effective score and while the overall result may be the same, the case for concern is not clearly identified. By assessing artificial production in a separate criterion we are able to better highlight any causes of concerns and areas that require improvement.

The Criterion is based on recommendations from the Hatchery Scientific Review Group, which is the independent scientific panel of the Pacific Northwest Hatchery Reform Project; a project set up by US Congress to reform hatchery management in the region. While the recommendations set forth by the group may not be appropriate in all instances, we believe that they provide the most comprehensive science-based recommendations that can broadly be applied to the management of artificial production and supplementation of salmonids.

Feedback: Please comment below on these proposed changes as well as any other comments on this factor.

Comments: Most salmon fisheries are mixed stock fisheries that catch not only a wide variety of strong and weak natural origin stocks, but also catch a very large variety of hatchery stocks. As an example, the Lyons Ferry Hatchery fall chinook are caught in measurable numbers in nearly every marine chinook fishery from California to SE Alaska. If a program such as this happened to be assessed as having a high risk to wild fish (I would vehemently disagree that this program does), then would you be forced to reflect this in every fishery that catches these fish? I think it is going to be a really complex and challenging task to realistically assess

fisheries based on the various hatchery programs that may be caught in those fisheries. Additionally, hatchery programs have a huge variety of goals and objectives. The HSRG recommendations for things like pHOS and pNOB are just that, recommendations. They were developed using models which had assumptions that may be more or less reasonable for different groups of fish. Managers sometimes accept these recommendations and use them, and sometimes do not. They are not the only reasonable scientific criteria. Managers look at a variety of factors. Hatcheries in the Columbia Basin as well as many other areas have developed or are developing Hatchery Genetic Management Plans (HGMP) which can determine on a case by case basis standards for managing the program in a way to avoid unacceptable risk to wild populations. These standards may or may not be different from the HSRG recommendations. If a hatchery program has an HGMP that has been reviewed and determined to be acceptable, then if it varies from HSRG standards, it would not be appropriate to penalize this program as having an in appropriate impact on wild fish.

Factor 5.1 Impact of Artificial Production on Wild Populations

Public Comment Guidance: Factor 5.1 assesses the impact or influence that artificial production is having on wild stocks caught within the fishery being assessed.

Feedback: We welcome feedback on whether these metrics are realistic and whether they adequately consider the concerns associated with the mixing of wild fish and hatchery origin fish on the spawning grounds.

Comments: I think it would be more appropriate to assess hatchery programs on whether or not they have an HGMP in place or other planning document analyzing impacts to wild fish.

Factor 5.2 Management of Artificial Production

Public Comment Guidance: Factor 5.2 assesses the management systems in place for artificial production. Due to the large number of artificial production systems that may be associated with fish caught in any given fishery, the proposal is to assess a 'typical' or 'average' artificial production system. This is consistent with Seafood Watch Aquaculture assessments at a country level where it is not practical to assess the wide range of performance that is often found across an industry. Where there are regional management systems in place, it is likely that most systems operate at a similar level of performance.

Feedback: The requirements are based on recommendations from the HSRG. We welcome comments regarding whether these requirements are appropriate; whether it is appropriate to require all of them for a highly effective management plan; whether there are additional requirements that should be considered.

Comments: See comment above. An HGMP will generally cover these factors in the tables and then should just be a matter of asking if the hatchery program is being managed to the objectives in its HGMP. If it is, then I think an assessment would indicate that it the program is being managed in a sustainable way.