

Monterey Bay Aquarium Seafood Watch®

Seafood Watch® Standard for Salmon Fisheries

Public comment period – 3: Comment Form

Please include your contact details below

All documents submitted during the public consultation process will be posted on our website. Documents will be posted exactly as we receive them except that this front page will be removed. The organization/author field below will be displayed as the 'author' of the online posted document. If you wish for your document to remain anonymous, please indicate in the check box below. If 'Anonymous' is selected, the 'author' of this document when posted on our website will then simply read 'Anonymous.'

Organization/Author	WWF-US
Name of point person	Alison Cross
Email	alison.cross@wwfus.org

Click if you would you like to remain anonymous

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:

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:

Overall I think you are missing quite a few areas of potential impact – please see below.

Appendix 8 references do not seem to cover current research (references range from 1995-2012) nor the great wealth of research conducted on Alaskan salmon.

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:

This requirement currently focuses heavily (only) on spawning impacts and genetic diversity. It should also include consideration of impacts throughout the salmon's life cycle, and specifically at the juvenile stage (i.e. potential impacts of hatchery fish on the growth and survival of wild fish, especially during "critical periods").

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:

5.2.1:

Not appropriate to assess a "typical" hatchery system – wide variation in production and strategies; this should be tailored based on the stocks and not be representative.

To be Highly Effective, the management system should explicitly protect wild stocks. The current requirements do not focus enough on ensuring there are appropriate strategies in place to address and minimize the effects of enhancement.

The requirements for the Moderately Effective category are much too weak; does not appear to actually consider the implementation or effectiveness of the strategy, nor the prevention of negative impacts on wild populations.

5.2.2

Highly Effective research must include consideration of all potential impacts on wild systems, including such things as density dependence, food competition, genetic mixing.

It may be inaccurate to frame this as “effective research” as there is no requirement for application of results nor effectiveness.

Information quality should be considered in the Highly Effective and Moderately Effective categories.

Also, at both the high and moderate levels there must be a requirement for application of the research – both an analysis of actual impact on productivity and genetic diversity and application of research results to decision making.

Ultimately, the research must lead to a sufficient understanding of the effects of hatchery fish on wild populations – this should be made more explicit.

5.2.3

Highly Effective: Should this be that permits are required and the regulations must be effectively enforced and complied with (instead of the permits themselves enforced)?

5.2.4

This section seems very vague; please provide detailed guidance for analysis and scoring.