



Public Consultation Comment Responses

IFFO RS V.20 Standard – First draft: Fishery Assessment Criteria

On the **8th August 2016** IFFO RS put forward the first draft fishery assessment criteria and process for the IFFO RS Standard Version 2.0 for 30 day public consultation.

All comments from Stakeholders and interested parties were greatly appreciated and taken into consideration in the development of Version 2.0 of the IFFO RS standard. Below is a breakdown of the comments received for first draft of the fishery clauses of the proposed standard together with the stakeholder proposal (if provided) and the response from IFFO RS.

Fishery clause comments and responses:

Clause	Stakeholder Comment	Stakeholder Proposal	IFFO RS Response
Section 1.3.1.1	Other than publically available what other definitions of transparent are required- suggest 'documented, attributable to an organisation, date of last review included and outcomes refer to the decisions taken by management on the use and access to the fishery? (These items could be added to assessment template as guidance)		Guidance accepted and appreciated, and will be used in continuing development of the standard and assessment process.
Section 1.3.1.2	Transgressors' -	Suggested text 'and a schedule of sanctions/penalties in place for violation of regulations'.	Response accepted & implemented
Section 1.3.2.1	Species' -	Suggested text 'Applicant fisheries that encounter additional fish	Previous wording retained for clarity



		species representing 5% or more must meet...'	
Section 1.3.2.1	'Total landings' -	Suggested text 'Applicant fisheries that encounter additional fish species representing 5% or more must meet...'	Previous wording retained for clarity
1.3.2.1.1	all' -	Those stocks of fish species encountered at > 5%?	Wording of the standard is clear that this applies to the >5% stocks
1.3.2.1.2	the stock' -	Those fishery stocks encountered at >5%	Wording of the standard is clear that this applies to the >5% stocks
1.3.2.1.3	Is this for stocks of species encountered at >5%. Might not have recommendations on levels from science but could still demonstrate they are not causing adverse impact- GSSI says recruitment over-fishing here but this is also a tough question to answer – FAO Guide says risk of extinction		The assessment is based on the assumption that there will be some indication from the scientific community as to whether the level of fishery removals is appropriate.
1.3.2.1.4	Is this for the stocks featured at >5%?		Wording of the standard is clear that this applies to the >5% stocks



1.3.2.2	Landings by weight'	Just again to clarify- landings or catches? Likely one of the same since inseparable but might be worth clarifying?	The relevant characteristic is Landings; discards are difficult to quantify, but are considered elsewhere in the assessment.
1.3.2.2.2	Could say same for clause 1.3.2.1.4 for >5%		>5% species are considered 'target' species and so more information must be available in relation to them
1.3.2.2.3	Could use this for >5%. For <5% assuming won't really be placing stock at this risk – would say that that alone is the strong evidence the fishery would present?		In some fisheries with large total landings, even less than 5% of the catch can be a massive absolute volume. Therefore it is important for assessors to consider the absolute effects of the fishery on the species.
1.3.3.1	negative effect' - Just word smithing- negative effect same as negative impact? Might not know the effects in any detail- ETP species are by definition - threatened anyway- so might be better to state The fishery must adhere to regulations that support the conservation objectives for ETP species (such as avoidance, reporting or monitoring requirements) and must not place ETP species in a serious risk of extinction.		Impact' and 'effect' are largely interchangeable.



1.3.3.2	Physical aquatic environment?		Impacts will almost certainly be to the physical aquatic environment, but 'physical environment' is adequate
1.3.4.1	Is the declaration publically declared somehow or internal?		The social clauses of the assessment will continue to be under review
General thoughts to keep in mind	Reference points and indicators that are not biomass based – as per previous comments and the subject of the recent workshops in Bangkok and Vietnam.		Guidance accepted and appreciated, and will be used in continuing development of the standard and assessment process. Multispecies fisheries will be a key development component moving forwards.
General thoughts to keep in mind	Biomass estimates and TACs that are not species based – the main basis for doing things in Thailand and Vietnam and probably other places as well. Thailand, as we know, has a management plan based on a desired yield but this is an aggregate as doing it by species is just not feasible.		Guidance accepted and appreciated, and will be used in continuing development of the standard and assessment process. Multispecies fisheries will be a key development component moving forwards.
General thoughts to keep in mind	Does every species in a mixed fishery have to be green? If there is one critical species does the whole lot fail? Would be good to have a look through some catch data to see how often this an issue otherwise all catches could fail		Guidance accepted and appreciated, and will be used in continuing development of the standard and assessment process. Multispecies fisheries will be a key development



	all the time if a grouper turns up (possible).		component moving forwards.
Species Categorisation Methodology	<p>Needs to be one area where all the information is. At the moment, one document (the fishery clauses) mentions the 5% rule but then the methodology introduces the 0.1% rule.</p> <p>I think that there should be a full species list available for the fishery and, at least for the first certification cycle, a risk based screen applied to identify anything that may be of concern. Sharks and rays may occur in small numbers and are not ETP listed (yet). Species identified as being at risk need to be investigated further.</p> <p>In terms of the 'stock column' also need to take into consideration multispecies stock assessments where species/stocks may be pooled. There may be management regimes aimed at pooled species/stocks, as is occurring in Thailand. As we find in Asia there may be a management regime in place but it may not be species specific. Need to capture this and make sure that it is evaluated. The Thai management regime was tabled at the Bangkok meeting earlier this year. The Vietnam one (Kien Giang province) was tabled at the Vietnam workshop.</p>	<p>I think that there needs to be a discussion about what is defined to be a multispecies fishery. Maybe we should trial a definition that it involves 10 or more species that go to the fish meal plant on a regular basis. Within this we should include:</p> <ul style="list-style-type: none"> Species in the same genus Species which may go to both the fish meal plant and for other uses depending on quality Species which may go to the fish meal plant both directly and via processing <p>The management regime should apply to the whole fishery and not just to the fish meal specie</p>	<p>Guidance accepted and appreciated, and will be used in continuing development of the standard and assessment process. Multispecies fisheries will be a key development component moving forwards.</p>



Scoring methodology	<p>Am not sure whether this works. Needs to be a mechanism for making simple improvements without causing the application to fail. What is unclear about the current system and the proposed pass/fail system is how many areas of poor performance are tolerable before the application as a whole fails. If the pass/fail system tolerates some fails then we end up with a 3 tier system anyway - i.e. all pass, pass but with some fails to fix, overall fail. I don't think that this approach is as fine-tuned as one that has this potential outcome in each clause (pass, pass with conditions, fail).</p>		Pass/fail system will be re-visited by the TAC



<p>Section 1.3.1</p>	<p>Participation in the management framework is mentioned in the methodology but is not in the Fishery Clauses document. The ASEAN fishery nations have recommended that co-management be the guiding framework for fisheries management. Need to ensure that these sorts of high level commitments are addressed. Same too for the Regionalisation of the FAO Code of Conduct for Responsible Fisheries. These sorts of commitments may need to be listed in the guidance for CABs if they cannot be referred to in the standard or the methodology. I think there should be a requirement for management plans. Management procedures are only part of the process. A management plan is more than just a collection of regulations but may include aspects such as access entitlements and capacity controls that are not related to controlling catches (e.g. may be focused on economic efficiency). A lot of effort has been put into promoting management planning by bodies such as FAO and so having a requirement that seek plans would be very useful.</p>		<p>Guidance accepted and appreciated, and will be used in continuing development of the standard and assessment process. Multispecies fisheries will be a key development component moving forwards.</p>
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<p>Section 1.3.2</p>	<p>As mentioned above I think that species based approaches run out of steam very quickly in species rich environments. Whilst the proposal for risk based approaches is a good step we also know that some relevant fisheries in Asia make use of multispecies assessments and have management rules that fit them. What we need to do is to have a mechanism for setting out what is best practice for these types of approaches otherwise we completely miss the main game, i.e. evaluating their management regimes. Moreover, we may well force a move into management regimes that may not work well - a point that has been made by country scientists and government from Asia for many years. Where such approaches are used the clauses need to ask for the rationale for the approach and whether it is performing to expectations. For example, if the fishery uses one species as an indicator for others then this needs to be spelled out and evidence provided of how it is delivering on management expectations, at the very least. For some of these fisheries, catching 100 or more species, the ability to collect species specific landings data is virtually</p>		<p>Guidance accepted and appreciated, and will be used in continuing development of the standard and assessment process. Multispecies fisheries will be a key development component moving forwards.</p>
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	<p>impossible. The government may do independent assessments but these may not reflect landings. The industry may be able to do total volumes and occasional subsampling but accurate data (that could support, for example, a estimation of whether catches of a particular species are 10% over) are highly unlikely. It would be better if data collection was required to be conducted in a way that helped support the management requirements. This would be a major setp forward, especially if it was conducted on a more regular basis than conducted now. Has the requirement for capacity reduction been removed? It is a major issue in SE Asia and having some requirement for this is one of the main advantages of IFFO RS compared to some other systems.</p>		
Section 1.3.3	<p>Benthic trawl fisheries present a range of challenges for the Standard not the least of which being that they commonly have significant impacts, if only on a very localised basis. There is abundant evidence that the degree of impact varies according to frequency of trawling, depth and substrate type, amongst other factors. I</p>		<p>Guidance accepted and appreciated, and will be used in continuing development of the standard and assessment process. Multispecies fisheries will be a key development component moving forwards.</p>



	<p>have previously suggested that the risk based approach be used for evaluating habitat impacts as there is a mythology out there. Not sure if this has been evaluated or not. Possibly needs to be some consideration given to having areas of habitat set aside from trawling.</p>		
Clause M1	<p>See comments about consultation above.</p>		
Category A species assessment section	<p>ts assumed that this applies to species that go to the fish meal plant but this may need to be made clear. For example, if a fishery takes a variety of species and some of them go for human food and some for meal then do the latter species get assessed? So, lets think about some real world scenarios. Consider a fishery catches threadfin bream (of various species totalling more than 5%of landings) and these go for processing, do these species trigger the 5% rule? If there is a small (1%) of threadfin bycatch goes to fishmeal as they are too small for surimi processing what happens then? If the threadfin by-products go to fishmeal how will all this work? the TAC for the fishery may apply to the whole lot and, moreover, it may permit some species to be more heavily affected than</p>		<p>Point accepted - the additional complexity of fisheries which are not exclusively reduction fisheries will be considered in the continuing development of the standard</p>



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	<p>others. This sort of conundrum is a big one for MSC and one that bedevils multispecies fisheries in many countries.</p>		
<p>Category B species assessment section</p>	<p>Does the absence of a species specific management regime it can possess a management/research regime that may cover a multispecies complex? May need to be spelled out what the difference between A and B is in these cases? Is it that B species have no management measures but just some data? How common is this? How common is it also that the species may be in good shape without some management measures? I'd argue that reference points are sufficiently rare in the world of fisheries that the its unlikely that they would have been set in the absence of other management measures. I understand the rationale for wanting to look at resilience but it maybe needs to be spelled out more clearly especially as to why susceptibility is not addressed. It could be because there is an assumption that because the species comprises greater than 5% of the catch then it is targeted in some way but this is not clear. Maybe I just need a few</p>		<p>Guidance accepted and appreciated, and will be used in continuing development of the standard and assessment process. Multispecies fisheries will be a key development component moving forwards.</p>



	examples of fisheries where B would apply.....		
Category C species assessment section	See earlier question about a multispecies fishery which may have species targeted for human consumption and some of it goes for fish meal. Would be good to have a few examples of the types of fisheries that C applies to.		Point accepted - the additional complexity of fisheries which are not exclusively reduction fisheries will be considered in the continuing development of the standard
Category D species assessment section	I think that all species should be assessed, at least in the first instance, irrespective of whether they are less than 1% or not. I presume the values in Table D1 are just examples only. Not explained very well. Need to work out how to deal with circumstances where there are fishery wide rules but they are not at a species specific level. Also need to give some credit where there are management rules in place but not necessarily reference points.		The point at which a species is caught in quantities small enough to be safely ignored for the purposes of the assessment will be revisited by the TAC
Clause F2	See previous comments about habitat risk assessments		
Clause F3	Ecosystem shifts are a big issue in the multispecies fisheries. There is a big debate about whether its possible to have any worthwhile yields without having some sort of change and so the question about the limits of acceptable change is a key one. there have been a number of		Guidance accepted and appreciated, and will be used in continuing development of the standard and assessment process. Multispecies fisheries will be a key development



	<p>attempts to identify ecosystem reference points but few have been adopted anywhere in the world. I think that in the first instance there should at least be some disclosure about known changes in the fish/invertebrate communities such that information is collected over time and more detailed management action implemented when the tools are developed.</p>		<p>component moving forwards.</p>
<p>Any other comments</p>	<p>There has obviously been a lot of thought put into this and the addition of risk based methods for dealing with large numbers of species is a welcome addition. I think it would be worthwhile having a look at information for a real fishery and seeing whether this all works and generates the outcomes we want. Spreadsheets for Vietnam catches have been sent and there is also information around for Thailand. It would also be important to have a mechanism for capturing how the existing systems work in those countries with respect to stock assessment. We need to make a decision whether we develop an approach that makes the systems in those countries work like those in ICES etc or whether we develop a system that looks for best practice at the regional level. As far as I can</p>		<p>Guidance accepted and appreciated, and will be used in continuing development of the standard and assessment process. Multispecies fisheries will be a key development component moving forwards.</p>



	see there is nothing fundamentally wrong with MMSY approaches and we need to capture this.		
Species Categorisation Methodology	Is clarity required as to whether the % is based on annual average, annual last year or expected or catch minimum / maximum?		
Scoring methodology	This makes interpreting the results much more straightforward - there is less ambiguity. However, if a fishery has just failed by a very small margin, that detail will be lost unless specifically highlighted in the report		Response accepted & implemented
Section 1.3.1	Are greater details required (perhaps in an appendix) as to what would be regarded as sufficient for these sub-sections? If the legal framework is not in place, what is the impact on the fishery being certified? Does it go to an improver's scheme? Should IUU be specifically mentioned and addressed		Fisheries which fail the assessment are able to apply to the Improver Programme if they desire.
Section 1.3.2	1.3.2.1.2.: what is sufficient frequency? Can guidelines be given on this? The more this can be firmed up, the less room for environmental advocates to get traction. 1.3.2.2.1: Great to have the IUCN red data book included here. It's in many other certifications.		Responses accepted & implemented



Section 1.3.3	What are significant impacts? Can guidance be given on what this is? There will be many interpretations of what this could be.		Response accepted & implemented
Clause M1	Section 1.5 - should there be some guidance on what constitutes stakeholders? Potentially some ambiguity around this. Section 1.6 - can a timeline be mentioned for making the information available. Often reports are written about fisheries using the latest data available, but already 2 years out of date. There needs to be a speeding up of communication, to accurately reflect the current position. This benefits fisheries which are improving, so they can show the change, rather than relying on old data which shows bad performance.		Response accepted & implemented
Clause M2	Clause numbers need to be fixed (M3.1 etc, when it should be M2.1 etc) Suggest 3.4 also refers to sanctions being applied when laws and regulations are broken.		Response accepted & implemented
Clause A2	Does there have to be guidance as to what is considered a "good enough" stock assessment?		The draft IFFO RS assessment includes requirements relating to what, specifically, the fishery stock assessment must contain to be adequate for our purposes.



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Category B species assessment section	Looks clear Should there be a statement that the data should be filled in for each species? It looks like it is only for one species, but there could be several		Response accepted & implemented
Category C species assessment section	Example species names need to be removed, but is good.		Response accepted & implemented
Clause F2	Section 2.3 - could also use "mitigation" as well as minimise? Eg allow seabed recovery after trawling?		Mitigation: the action of reducing the severity, seriousness, or painfulness of something Minimise: reduce to the smallest possible amount or degree
Any other comments	1.3.4 - Social Aspects: given the recent focus on this for Thailand and the North Sea, this needs to be much clearer. There are easy examples to follow for the points which require to be listed: no slavery, no bonded labour, no		The social clauses of the assessment will continue to be under review



	<p>child labour, etc. This has to include vessels feeding into the main vessel as well - if that takes place. We've seen the issues that are in Thailand.</p> <p>The same for the section on social criterion on page 17. Should be expanded to include reference to ILO, etc.</p>		
<p>general</p>	<p>I think the proposed standard is outstanding and reflects the best practices for fisheries management in an actionable manner.</p> <p>In the Fishery Assessment Template, it appears the assessment criteria are essentially Pass/Fail for various species, I would suggest that an additional category be introduced for criteria in which the fishery is on the border of either passing or failing. I noted in the SFP annual sustainability report that a number of the low-rated fisheries had parties who had received IFFO-RS certification. An additional layer of nuance might give the program more credibility by suggesting that IFFO-RS does not just approve all reduction fisheries. I have attached the table that demonstrates this in the current SFP report.</p>	<p>Also, I would suggest that an annual report similar to the SFP report be published to summarize the results of assessments in a single document. Doing so would afford the opportunity to promote the program and in turn educate retailers and consumer product companies about its importance. Attachment</p>	<p>Point to take into account: annual report similar to the SFP report be published to summarize the results of assessments in a single document. Doing so would afford the opportunity to promote the program and in turn educate retailers and consumer product companies about its importance.</p>



<p>General : Non IFFO-RS certified oil residue limit (%)</p>	<p>Some fish oil refining companies may have both IFFO-RS certified and (non IFFO-RS) certified crudes, while owning a well-developed traceability system of tracing finished products back to crudes. In some instances there are situations whereby small amounts of non-certified crudes remains in sophisticated reactors before initiating a process to refine only IFFO-RS certified oils. I presume it is operationally inconvenient to drain out small residues of non-certified crudes from every component of a chain of purifying installations that in turn have significant cost implications to both producers and consumers. In such cases, companies are not encouraged to engage into such additional operations so long as no other quality-associated risks are detected. To this effect, I propose IFFO-RS to set a buffer limit of (5% - 8%) that promotes fair treatment of all parties.</p>		<p>Guidance accepted and appreciated, and will be used in continuing development of the standard and assessment process.</p>
<p>Section 1.3.1</p>	<p>1.3.1.1 How would the factory prove this to the auditor? Suggest the auditor requires 'appropriate documentation' to show it. Also suggest 'conservation of the fishery' is changed to 'sustainability of the fishery' because fishing is</p>		<p>These clauses are assessed during the fishery assessment process. It is recognised that they are not the direct responsibility of the factory; however a key aspect of the IFFO RS</p>



	<p>about the exploitation of the resource. Suggested rewording: Appropriate documentation shows that the fishery is managed according to the development and implementation of measures and controls relating to legal, administrative and scientific criteria, to support the sustainability of the fishery 1.3.1.2 How can the factory be responsible for this? What would they show the auditor? Needs to require evidence that the auditor can confirm.</p>		<p>programme is to ensure fisheries are operated in a responsible way.</p>
<p>Section 1.3.2</p>	<p>1.3.2.1 Fishing activity might be putting the stock or fishery at risk without putting the species at risk. This should be accounted for. 1.3.2.1.1 This is not very specific in what evidence the factory can show during the audit. ClientEarth is the secretariat for the Sustainable Seafood Coalition (SSC) and the guidance that we developed with the seafood supply chain states that: •The most recent scientific advice on stock health is reviewed, including whether or not the stock is overfished. •The most recent scientific advice is reviewed to check whether overfishing of the</p>		<p>These clauses are assessed during the fishery assessment process. It is recognised that they are not the direct responsibility of the factory; however a key aspect of the IFFO RS programme is to ensure fisheries are operated in a responsible way.</p>



	<p>stock is occurring;</p> <ul style="list-style-type: none"> •Measures are in place to prioritise research and data collection to improve scientific knowledge of the stock. If the stock is data deficient, measures are in place to improve data collection. 1.3.2.1.4-and-1.3.2.2.2 <p>This is not very specific in what evidence the factory can show during the audit. The Sustainable Seafood Coalition’s guidance says (section 2.1.1):</p> <ul style="list-style-type: none"> •The health of the stock is considered relative to reference points, for example, by checking that the stock biomass is above MSY and fishing levels are below MSY •Effort or catch limits and reference points (or proxies) are in place for the stock, where applicable 		
<p>Section 1.3.3</p>	<p>1.3.3.1 ETP acronym should be described before it is used here. How can the impacts of the fishery on the ETP species be monitored? That implies a study on the ETP species. Should it not be ‘monitor the effects of the fishery on... (i.e. mortality/collisions)? What is a ‘significant negative effect’? And what actions should be taken if there are these effects? SSC guidance says: Avoid the capture of</p>		<p>These clauses are assessed during the fishery assessment process. It is recognised that they are not the direct responsibility of the factory; however a key aspect of the IFFO RS programme is to ensure fisheries are operated in a responsible way.</p> <p>Additional explanation of specialist terms will</p>



	<p>threatened, endangered, and protected (TEP) species and ensure any interaction is reported; (note that reporting is sometimes not mandatory but it is best practice to do so)</p> <p>1.3.3.2 How will this be audited? SSC guidance says:</p> <ul style="list-style-type: none"> •The potential impacts of the fishing activity on the habitat, ecosystem and wider environment are reviewed; •Mitigate potential impacts of the fishing activity on the habitat, the ecosystem and wider environment <p>1.3.4 What does 'internationally recognised guidance on human rights' refer to? ILO188? RFS certified vessels? Or consideration of broader human rights standards as set by UN bodies such as the Human Rights Committee?</p>		<p>be provided via the glossary.</p>
<p>Any other comments</p>	<p>We support the public consultation process and the aim to provide a robust certification scheme for fish feed factories, and are grateful for the opportunity to participate in this process. It is unclear what the relationship between the 'criteria clauses' and the 'fishery assessment criteria' is. In particular, it is unclear what the different purposes are of</p>		<p>Assuming the comment refers to the standard and the fishery assessment template as 'separate' clauses, the difference between and purposes of the two documents are well defined in the IFFO RS control manual and other documentation.</p>



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	<p>the two sets of statements/questions. Are the 'criteria clauses' intended to be public facing, whereas the 'fishery assessment criteria' will be used only for assessments? If this is the case, then it would be better if the set of 'criteria clauses' were expressed in short and simple sentences so that it is entirely clear to the public what issues you are dealing with and how.</p> <p>Some of our concerns above on the (presumably public facing?) 'criteria clauses' may be met to an extent through the 'fishery assessment criteria', but there is still a need to be clear about what the criteria actually are. There is a certain lack of clarity in the framework as a whole because of the two sets of 'criteria'.</p>		
<p>General</p>	<p>Excellent work on working towards making the IFFO RS ISEAL compliant. Our main comment relates with the practical consequences of the proposed methodological changes. It is not clear how the proposed changes in the scoring methodology will affect factories that are now IFFO-RS certified. Will fisheries that have previously been rated as medium compliance fall immediately in the fail</p>		<p>This is a question related to process rather than a recommendation</p>



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	outcome? Marine Harvest highlights the need of trial audits and possible re-evaluation of the methodological approach of version 2 of IFFO RS before it is launched.		
Species Categorisation Methodology	It is unclear at the moment how the proposed changes in species categorisation and the different levels of assessment will affect factories that are now IFFO-RS certified. Marine Harvest highlights the need of trial audits and possible re-evaluation of the methodological approach of version 2 of IFFO RS before it is launched.		Trial assessments and further review of the proposed approach (including another public consultation) form part of the V2 development process.
Scoring methodology	It is unclear at the moment how the proposed changes in the scoring methodology will affect factories that are now IFFO-RS certified. Will fisheries that have previously been rated as medium compliance fall immediately in the fail outcome? Marine Harvest highlights the need of trial audits and possible re-evaluation of the methodological approach of version 2 of IFFO RS before it is launched.	CATEGORY B SPECIES Category B species are those which make up greater than 10% of landings in the applicant raw material, but which are not subject to a species-specific research and management regime sufficient to pass all Category A clauses. If there are no Category B species in the fishery under assessment, this section can be deleted. Category B species are assessed using a risk-based approach. The	[Repeat comment]



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		following process should be completed once for each Category B species.	
General	<p>Piers and I have discussed our views on the draft and thought that, in addition to the attached, we just wanted to outline some other comments:</p> <ol style="list-style-type: none"> 1. WWF has a priority of ensuring that change is driven in seafood supply chains and that initiatives support/enable improvement work. The landscape of fisheries improvements has developed considerably over the last 5 years (as discussed in the TAC) and how IFFO RS participates in the arena will be dependent on how it is able to achieve alignment with other programmes and contribute to certifications such as the MSC. 2. It is important that the IFFO RS fishery assessment aligns with likely requirements in the new ASC Feed Standard for continuous improvement from a status of 'no certification' through to IFFO RS to MSC. It seems clear that the IFFO RS fishery assessment needs to contain the same 3 pillars as does MSC so that each pillar can be seen 		<p>For discussion by TAC and/or OB. It seems clear that the IFFO RS fishery assessment needs to contain the same 3 pillars as does MSC so that each pillar can be seen to improve as it moves forward and at each stage it can be easily identified what needs to improve to get to the next stage and fishery managers can see a clear pathway with minimal duplication and an end goal.</p>



	<p>to improve as it moves forward and at each stage it can be easily identified what needs to improve to get to the next stage and fishery managers can see a clear pathway with minimal duplication and an end goal.</p> <p>3. We would suggest that IFFO conduct an outreach exercise which demonstrates how the model of engaging with IFFO will contribute to the work in the wild capture fisheries and help achieve industry objectives of improving (to e.g. MSC). This could be to TAC NGO members such as MSC, SFP, WWF and MCS. This should also cover how alignment with international standards has been incorporated such as MSC? Can IFFO demonstrate that the delivers what they aimed to at the beginning of the review process – back to the first TAC meeting? We discussed this idea with the MSC who though that this would be valuable.</p>		
<p>General</p>	<p>Additionally:</p> <p>4. Reducing costs and duplication of efforts should also be enabled through this review process; simplification and alignment will help provide a clear path for fisheries and supply chains.</p> <p>5. Throughout the documents, the definitions and wording</p>		<p>Guidance accepted and appreciated, and will be used in continuing development of the standard and assessment process.</p>



	<p>needs to be tightened, defined and less ambiguous e.g. 'adequate'.</p> <p>6. I attach for you the "WWF position on social issues in the global seafood industry" for your reference relating to the social criteria mentioned.</p> <p>7. Perhaps in the outreach meeting, you could cover how similar were the results of the assessments with the new model compared to the assessments using the old model?</p> <p>Please do get in touch with us (myself or Piers) if you have any questions on our comments.</p>		
Scoring methodology	<p>Will the 'pass' category qualify it for an MSC 80+ score?</p> <p>Will the 'fail' category give justification for the failure and thus be able to contain the information required to enable implementation of action(s) to improve the rating? An explanation as to how the process is going to drive improvements in the 'sustainability' rating of the fishery without conditions being given? ('conditions' are of course a key component of change in other standards)</p>		<p>IFFO RS pass/fail ratings are not directly equivalent to any particular MSC scores. Improvement will primarily be driven by the revised Improver Programme.</p>
Other (methodology)	<p>Provide an explanation as to how the process is going to drive improvements in the</p>		<p>Improvement will primarily be driven via the improver</p>



	<p>'sustainability' rating of the fishery without conditions being given? ('conditions' are of course a key component of change in other standards). Please provide the definition of terms - difficult to assess some of the sentences without definitions. Is it in a decision tree earlier on that asks "is the fishery MSC certified"? Then, presumably, many of these questions are answered in the MSC assessment or that the IFFO assessment can just say, tick, MSC and there is no need to answer the questions in a second assessment.</p>		<p>programme; however the pass/fail approach will be revisited by the TAC</p> <p>Terms will be further defined in the glossary</p> <p>MSC certified fisheries are automatically approved for use as a source of IFFO RS raw materials</p>
<p>Section 1.3.1</p>	<p>1.3.1.1 Addition "The management FRAMEWORK or SYSTEM...".</p> <p>1.3.1.1 The management of the fishery must include a legal, administrative and scientific basis for the development and implementation of measures and controls to support the conservation of the fishery. The aim should be the conservation of the fish stock. Old standard (V. 1.6):</p> <p>1.3.1.1 There must be objectives that promote the long-term conservation and sustainable use of fishery resources and ecosystem.</p> <p>1.3.1.2 "outcomes" such as what, is it for fines and the</p>		<p>Assessors will make an expert decision, based on their knowledge of fisheries and ensuring they remain in line with the precedents set in previous assessments.</p>



	<p>like?</p> <p>1.3.1.2 Fishery management actions must be based on the long-term conservation of the fishery and ecosystem.</p> <p>1.3.1.2 are there no incidences where the information doesn't need to be "publically available" and that perhaps 'available upon request' might surface?</p> <p>1.3.1.3 does there need to be "organisations" in every case or maybe just a department? maybe this needs changing to "...must be systems, personnel and a relevant bodies in place..."?</p> <p>1.3.1.3 what is the definition of "effective"?</p> <p>1.3.1.3 what is the definition of "transgressor"?</p>		
Section 1.3.2	<p>1.3.2.1 what is the definition of "strong evidence" and "over-exploitation"?</p> <p>1.3.2.1.2 what is the definition of "sufficient frequency"?</p> <p>1.3.2.2.1 this should apply to the 'more than 5%' category too shouldn't it?</p>		Assessors will make an expert decision, based on their knowledge of fisheries and ensuring they remain in line with the precedents set in previous assessments.
Section 1.3.3	<p>Impacts' on what? This is potentially very big - does it need to be specific e.g. environmental impacts?</p>		Assessors will make an expert decision, based on their knowledge of fisheries and ensuring they remain in line with the precedents set in previous assessments.



<p>Clause A4</p>	<ul style="list-style-type: none"> A.4.1 “the stock is currently above the limit reference point or proxy and there is evidence that a fall below the limit reference point would result in fishery closure” 		<p>Wording to be revised for clarity</p>
<p>Category B species assessment section</p>	<ul style="list-style-type: none"> CATEGORY B SPECIES, Determining Resilience Ratings, Musick’s tool is for assessing the general extinction risk of a species and cannot simply used to estimate the resilience against overfishing. It must be taken into account if a species exhibit any inherent life history characteristics that make it particularly vulnerable to fishing pressure e.g. (1) Schooling, (2) other temporary aggregations (spawning, feeding, or diurnal), (3) Geographic distribution – a very limited range or scattered distribution or patchy distribution or isolated subpopulations or restricted mobility, (4) Diadromous (anadromous or catadromous), (5) Semelparous or viviparous reproduction, (6) Sequential hermaphrodit , (7) Other (e.g. high natural population variability (for example: El Nino or decadal oscillations), naturally rare, highly migratory, complex life cycle). 		<p>Category B utilises a conservative approach making it challenging for a species to be approved via this methodology.</p>



Category D species assessment section	<ul style="list-style-type: none"> CATEGORY D SPECIES This is a new approach and needs testing (and publication of real life examples). 		Guidance accepted and appreciated, and will be used in continuing development of the standard and assessment process.
Any other comments	<p>The social aspects section needs to be stronger and expanded to include all of the major concerns in the seafood supply chains at the moment.</p> <p>This is a current 'hot topic' and if IFFO does not make this criteria solid at this stage then developments of 'acceptable' levels of standards in the sector will soon surpass this criterion.</p> <p>There are no major steps towards sustainability and we have the impression that in some aspects the new standard is weaker than the old 1.6 Version</p> <p>Definitions are missing e.g. "significant negative effect/impact", "substantial evidence" . The ETP / habitat / ecosystem chapters reverse the burden of proof and are therefore not precautionary.</p>		The social clauses of the assessment will continue to be under review
SPECIES CATEGORISATION	<p>On page 5 of the Fishery Assessment Template & Process - "SPECIES CATEGORISATION"</p> <p>If the 5% rules/categorisation in the Fishery Assessment</p>		The chain of custody does not need to manage this categorisation - it is only for use during the fishery assessment. Once a fishery is



	<p>Template & Process are used: Category A: More than 5% of landings, species-specific management regime in place. Category B: More than 5% of landings, no species-specific management regime in place. Category C: Less than 5% of landings, species-specific management regime in place. Category D: Less than 5% of landings, no species-specific management regime in place.</p> <p>How is this categorization to be managed in the Chain of custody?</p>		<p>approved, all of the materials originating from it may be used to produce IFFO RS certified materials.</p>
<p>General</p>	<p>An example: From a single landing from the directed fishery for sprat in the North Sea, the catch reported (sales slip/logbook) to the factory by the fisher is as follows:</p> <p>629 tonnes of sprat 183 tonnes of anchovy 6 tonnes of whiting 2 tonnes of mackerel</p> <p>How much of the fishmeal and fish oil produced from this landing is IFFO RS? How should it be handled and documented in the chain of custody?</p> <p>On page 17 of the Fishery Assessment Template & Process - "SOCIAL CRITERION"</p>		<p>All of the material is IFFO RS approved, as explained above.</p> <p>Social criteria will be reviewed and revised further before implementation.</p> <p>Fish weighing by the factory is not covered by the fishery assessment.</p>



	<p>How is the following clause to be fulfilled by the factories? In addition to the scored criteria listed above, applicants must commit to ensuring that vessels operating in the fishery adhere to internationally recognised guidance on human rights. They must also commit to ensuring there is no use of enforced or unpaid labour in the fleet(s) operating upon the resource.</p> <p>It seems misplaced to ask the factories to control the internationally recognised guidance on human rights! This should be the duty of the state control agency.</p> <p>Not in the present draft Fishery Assessment All factories should have documentation for correctly weighing of all fish landed to the factory e.g. through certification from a third party weighting control agency.</p>		
<p>Species Categorisation Methodology</p>	<p>On page 5 of the Fishery Assessment Template & Process - "SPECIES CATEGORISATION" If the 5% rules/categorisation in the Fishery Assessment Template & Process are used: Category A: More than 5% of landings, species-specific</p>		<p>[Repeat comment]</p>



	<p>management regime in place. Category B: More than 5% of landings, no species-specific management regime in place. Category C: Less than 5% of landings, species-specific management regime in place. Category D: Less than 5% of landings, no species-specific management regime in place.</p> <p>How is this categorization to be managed in the Chain of custody? An example: From a single landing from the directed fishery for sprat in the North Sea, the catch reported (sales slip/logbook) to the factory by the fisher is as follows:</p> <p>629 tonnes of sprat 183 tonnes of anchovy 6 tonnes of whiting 2 tonnes of mackerel</p> <p>How much of the fishmeal and fish oil produced from this landing is IFFO RS? How should it be handled and documented in the Chain of Custody?</p>		
<p>Any other comments</p>	<p>On page 17 of the Fishery Assessment Template & Process - "SOCIAL CRITERION" How is the following clause to be fulfilled by the factories? In addition to the scored criteria listed above, applicants must commit to</p>		<p>[Repeat comment]</p>



	<p>ensuring that vessels operating in the fishery adhere to internationally recognised guidance on human rights. They must also commit to ensuring there is no use of enforced or unpaid labour in the fleet(s) operating upon the resource.</p> <p>It seems misplaced to ask the factories to control the internationally recognised guidance on human rights! This should be the duty of the state control agency.</p> <p>Not in the present draft Fishery Assessment All factories should have documentation for correctly weighing of all fish landed to the factory e.g. through certification from a third party weighing control agency.</p>		
Item 1.3.3	<p>The comments are aimed at item1.3.3. Version 2 of IFFO RS Standard on the "Impact of fisheries". Although it considered important the protection ETP species and the extent of the ecosystem, there is no appropriate methodology for monitoring the impact of the fishery on ETP species, in the physical environment and the aquatic ecosystem indicators.</p> <p>Monitoring the impact would be only qualitative rather than quantitative, so it would be an</p>		<p>Potential for further expanding the 'further impacts' section to be discussed by the TAC</p>



	unworkable requirement because there would be no way to qualify compliance, which would cause unnecessary obstacles to activity”		
Additional Comments	<p>If the certification body is considering to withdraw the IFFO-RS certification, it is of great importance that contact with the applicant is established.</p> <p>Norway experienced i.e. that the Norwegian management of sand eel was questioned. However, after having the management system explained by the institute of marine research (Bergen, Norway), the Norwegian management of the sand eel fishery was found to be sustainable. (The Norwegian management system for sand eel differs from the ICES advice – it is actually, from a Norwegian point of view, stricter than the ICES model.)</p>		<p>This is a comment on process rather than a recommendation on the new draft. The existing (and intended future) process in such circumstances is for the CB to contact the applicant for further detail prior to the suspension / removal of an approval.</p>
Species categorisation methodology	<p>Would recommend that order of categories is re-arranged.</p> <p>Cat A and B, should be for species that are managed with reference points, 5% and <5% respectively. Cat C and D are for species not managed with reference points with volumes corresponding as above.</p>		<p>Current order retained, for clarity.</p>



<p>Scoring methodology</p>	<p>This approach can work, but IFFO RS should test this on their current fishery portfolio. Since there is no mechanism by which IFFO RS fisheries can improve, is it the intention that these end up in an IFFO RS improvers programme instead? This methodology should preferably also then be revised to encompass the changes within v2 proposed here. What are the constraints on improvement within the improvers programme, timelines etc?</p>		<p>The IP will be the main mechanism by which improvement is driven, and the IP procedure will be extensively revisited and revised.</p>
<p>Other (methodology)</p>	<p>In order to determine the 5% landings rule, it states in the standard that discards should be included when known. This makes it tricky to audit, since you are then mixing up catch vs landings. In the discard category, there could also be risks of slipping, potential IUU etc. What documents would the auditor have to see in order to verify this? Landings data from port controls is very different from catch records, including discards such log-books, observer protocols etc, which is actually looking at total mortality instead. This could be particularly important in order to ensure the less than 5% species, where you want to avoid endangered species etc, are not discarded at sea, since these might not be landed</p>		<p>Assessors will use all available sources of information, including fishery-independent surveys, to determine the likely catch composition (which will, in any case, vary from year to year). ETP species are considered in the 'further impacts' section.</p>



<p>Section 1.3.2</p>	<p>1.3.2.2.2 - It is stated that the stock needs to be within defined reference points. Does this refer to being below MSY but above Blim for instance? This could use further definition. The next line states that stock cannot be overexploited, which suggests that stock needs to at the very least be above a certain point. Also this can currently include Cat B species, which may not have these reference point (very likely if not managed). See suggestion above for re-categorisation of species groups.</p>		<p>Recommendation accepted, section re-worded for clarity</p>
<p>Section 1.3.2</p>	<p>1.3.2.2.3 - What is definition of strong evidence? How is this justified to an auditor vs weaker evidence?</p>		<p>Assessors will make an expert decision, based on their knowledge of fisheries and ensuring they remain in line with the precedents set in previous assessments.</p>
<p>Section 1.3.2</p>	<p>1.3.2.1.4 - The fishery is only closed if it falls below the LRP, but is this captured in annual audits at the factory level? Should this clause, not tie into 1.3.2.1.3 and that the harvest control rules are in place to ensure recommended TAC is not exceeded with the aim of keeping the stock at the established target reference point.</p>		<p>Surveillance assessments of IFFO RS fisheries are conducted annually. All clauses in the standard are tied together via the fishery assessment template</p>
<p>Section 1.3.3</p>	<p>Some of these terms need further definition. What is an ETP species, are all habitat types considered equally and</p>		<p>Recommendation accepted; further detail added to glossary</p>



	what level of ecosystem impacts are considered a pass within the standard (and how are these measured and what evidence is sufficient?)		
Clause M2	M3.3. How do you define substantial evidence of no IUU or lack of compliance?		Assessors will make an expert decision, based on their knowledge of fisheries and ensuring they remain in line with the precedents set in previous assessments.
Clause A1	A1.2 - Does this then refer to catch level data including discards on a stock level? Going back to the fact that there is statement that discards should only be included when known. Will there be a guidance list for auditors developed on what types of documents should be required to confirm this data, including a measure of accuracy. In other words, what does 'sufficient' mean in this context?		Assessors will use all available sources of information, including fishery-independent surveys, to determine the likely catch composition (which will, in any case, vary from year to year).
Clause A2	Does A2.1. not make the preceding clauses in A1.2 redundant? If this clause states that all fishery removals need to be known? Would substantial supporting information mean that there are no other indications that the stock is at risk of falling below Limit reference points? Needs additional definition on substantial and what types of information are needed in		Clause to be re-visited to ensure clarity and minimise redundancy



	order to demonstrate a defined outcome.		
Clause A3	<p>A3.2 - The allowance for exceeding the TAC should surely only be allowed if the scientific recommendations have this built into their recommendation. This would be intimately tied to the current stock status trend of the species. If the trend is going down, it does not seem prudent that the fisheries themselves decide to harvest 10% above the TAC. This also assumes that this would be the only fishery on the stock. If there are other fisheries not assessed on the stock, IUU fishing, international disputes on quotas, the cumulative % increase on mortality could lead to stock collapse. Suggest re-framing this clause that harvest strategy is designed to keep the stock at a defined target level and removals recommended to maintain this level.</p>		<p>Failure to meet a single requirement means a fishery cannot be approved, therefore there is an element of flexibility built into the requirements. However the clause will be reviewed in the context of this comment.</p>
Clause A4	<p>A4.1. The first two clauses seem not applicable. This wording would indicate that a fishery that is closed, would still be allowed to be approved? Which they would not be able to target anyway, thus rendering approval redundant anyway, since there is no system of conditional improvement built</p>		<p>Discussed extensively during TAC meetings, this requirement will remain the same</p>



	<p>within this version. Would suggest delete the first two clauses and keep 'the stock is at or above the target reference point.</p>		
<p>Category A species assessment section</p>	<p>A4.1. The first two clauses seem not applicable. This wording would indicate that a fishery that is closed, would still be allowed to be approved? Which they would not be able to target anyway, thus rendering approval redundant anyway, since there is no system of conditional improvement built within this version. Would suggest delete the first two clauses and keep 'the stock is at or above the target reference point.</p>		<p>[Repeat comment]</p>
<p>Category B species assessment section</p>	<p>Most species in this unmanaged category will more often than not have any reference points in place. Therefore table BB is most likely the one that will be used most often, but this table still assumes that a lot of knowledge on trends on B and F are readily available to an auditor. I would suggest to include additional guidance and definitions on proxies to use when these points are unknown, for instance using long-term landings data etc. The table also seems to be skewed towards favoring B over trends of F, which for small pelagics, the estimate of</p>		<p>Category B is intended to be more conservative than category A as it allows the approval of low-information stocks. However the wording will be clarified to allow the use of proxies.</p>



	B tends to be associated with a higher uncertainty than long term trends of F.		
Category C species assessment section	C1.1. - Seems redundant and covered by C 1.2. CAT C species will be managed and have reference points by definition. So C1.2. seems appropriate and sufficient on its own in this regard, but I think you need to define what is considered 'negligible'.		C1.1 is a separate requirement to C1.2, as it asks whether the *assessment* fishery removals are included in the *main* stock assessment.
Category D species assessment section	I am questioning why this is proposed approach is needed. If this is a mixed fishery approach, which I had heard from feedback was not in scope yet also confirmed by the policy timelines in this document above that should be a separate framework. The CAT B assessment, which already deals with unmanaged species, is a different risk based approach in this document. I do not see why the volume of the landings matter in this regard to assess risk. Suggest remove the risk rating PSA approach adopted for CAT D and simply use the one for CAT B. They are the same category of species by definition, the only thing differing being the landings. The current proposal, at the face of it, also seems to be one of the most onerous for an auditor to undertake, when in many cases, what is being assessed here are very small		The objective of Category D is to allow the assessment of 'bycatch' species. The use of Category B for bycatch species would mean the failure of any fishery which catches any species without biomass & fishing mortality trend data. Category D allows the approval of fisheries with bycatch species with low information.



	<p>quantities of catches, often likely negligible. A suggestion to radically simplify this, would be to make CAT D the same as CAT B, but if these catches are less than 5% of total catches, they are considered negligible by default. This would not apply to ETP species and these scored separately.</p>		
<p>Clause F1</p>	<p>F1.1 Define if any type of recording is sufficient for interactions. Perhaps illustrate with guidance what manner of recording and the accuracy obtained from such recordings are sufficient. F.1.2 Define substantial evidence and what is a significant negative impact F1.3 Define is measures in place need to be proven to be effective as well. Finally it is not clear what the definition of ETP species is. This also needs explicit definition in the standard</p>		<p>Assessors will make an expert decision, based on their knowledge of fisheries and ensuring they remain in line with the precedents set in previous assessments.</p>
<p>Clause F2</p>	<p>F2.1 Considered or recorded? What evidence can be presented to auditors that interactions are considered? F2.2. Define substantial evidence and what is a significant impact F.2.3 Define if measures in place need to be proven effective as well Are all habitat types considered equally in this regard? Sand vs coral are very different things in terms of</p>		<p>Assessors will make an expert decision, based on their knowledge of fisheries and ensuring they remain in line with the precedents set in previous assessments.</p>



	impacts and could be handled differently within the standard		
Clause F3	F3.1 Define what level of consideration is considered sufficient F3.2, Define substantial evidence and significant negative impact F3.3. Define what is meant with a key role in the ecosystem		Assessors will make an expert decision, based on their knowledge of fisheries and ensuring they remain in line with the precedents set in previous assessments.
Any other comments	For ETP, Habitats and Ecosystem, the comments are very similar and more definitions are needed in order to clarify the level of impact and precaution that should be handled within the IFFO RS process. The first clauses for these all relate to whether these interactions are considered. These could perhaps better be phrased around considerations tied to the fact that some level of information is starting to be recorded by these fisheries with regards to these wider ecosystem elements. In other words, a good place for the IFFO RS assessment to start, could be that these fisheries are at the very least starting to collect a level of baseline information with regards to these interactions. This could also be expanded upon in the definitions of substantial evidence and negative impact.		Assessors will make an expert decision, based on their knowledge of fisheries and ensuring they remain in line with the precedents set in previous assessments.



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Public Consultation

Any other comments	There is very little information on the social declaration. The details of this needs to be presented before the next public consultation.		The social clauses of the assessment will continue to be under review
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