

Mr. Steven Devitt
TAVEL Certification Inc.
Suite 815, 99 Wyse Road
Dartmouth, N.S. B3A 4S5

July 6, 2009

Dear Mr. Devitt,

Greenpeace would like to take this opportunity to provide its comments on the recent Notice of Objection led by Oceana and the Monterey Bay Aquarium regarding TAVEL Certification Marine Stewardship Council assessment of Pacific hake mid-water trawl fishery. Greenpeace supports the objection due to irregularities in the assessment process which violate MSC principles. This letter summarizes our concerns and further explains our support of the objection.

During the certification process, several omissions occurred which could lead to wrongful certification of the fishery in question. Though these omissions are addressed elsewhere within the Fishery Assessment Methodology, they should be applied to the Pacific hake Assessment tree to ensure compliance with MSC principles.

Under Performance Indicator 2.1.5.1, the fishery is required to determine the acceptable levels of impact on ecosystem function, later reviewing and updating these impacts. Greenpeace supports further requiring the fishery to comply with and update compliance with these acceptable levels within the Pacific hake assessment tree.

Under Performance Indicator 2.1.5.2, performance indicators for management strategies are indistinct and may lead to miscommunication from the fishery as well as a violation of MSC Principle 2. Greenpeace supports a separate performance indicator for strategies regarding physical impacts, operational waste and ecosystem impacts in order to take all facets of management strategies into account. Through strengthening of this performance indicator, TAVEL can more clearly take bycatch and waste breaches into account.

Under Performance Indicator 2.2.2.5, there is no performance indicator regarding bycatch that is neither listed nor protected. Greenpeace supports strengthened management of bycatch regarding non-target species.

Under Performance Indicator 1.1.3.1, Scoring Guidepost 60 does not account for specific characteristics of species within the fishery assessment model. Greenpeace supports use of assessment models that take biology of species and nature of the fishery into account.

TAVEL Certification Inc. did not use the most current scientific information when performing the assessment, setting a catch level that is expected to lead to overfishing. Greenpeace supports a revision of the fishery catch levels using the most current data.

Mid-water trawling contacts the ocean floor during almost half of its usage. Greenpeace supports use of different gear to harvest fish that does not pose a threat to the sea floor.

Due to prior incidents regarding dumping and misuse of bycatch, Greenpeace supports stricter video monitoring on vessels and in processing plants.

In conclusion, Greenpeace supports the objections posed by Oceana and the Monterey Bay Aquarium. The Assessment Team must revisit its assessment of the fishery and the assessment process in order to ensure sustainability of the fishery and the Pacific hake.

Sincerely,

John Hocevar
Oceans Campaign Director
Greenpeace USA