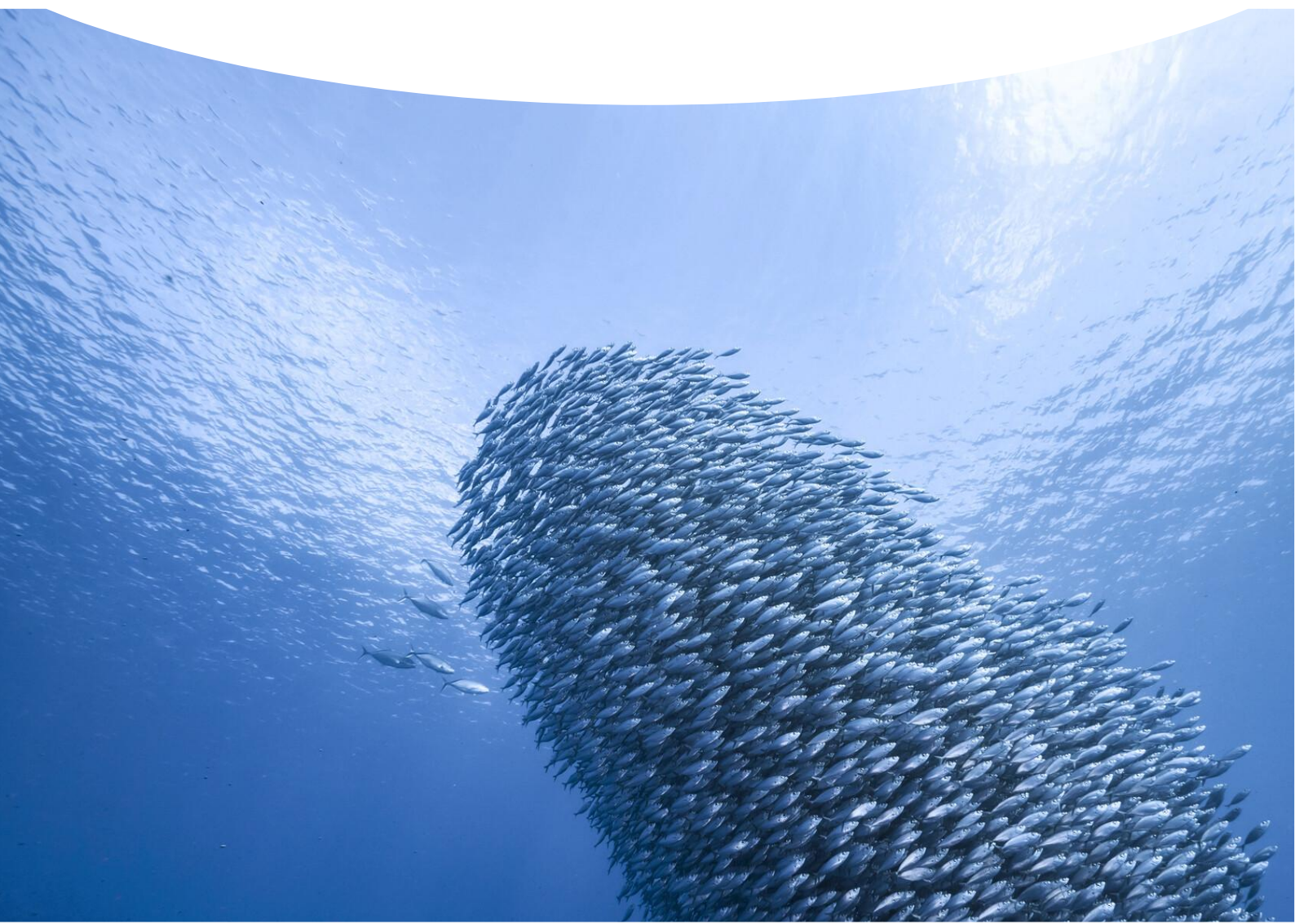


# **MSC FISHERIES STANDARD TOOLBOX REVIEW**

## **July – September 2025 Consultation Summary Report**

Catherine Veronis, Wilbert Van Deelen, Laura Weston, Polly Burns  
May 2026



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# Glossary

CAB	-	Conformity Assessment Body
CA	-	Consequence Analysis
CSA	-	Consequence Spatial Analysis
EEZ	-	Exclusive Economic Zone
EM	-	Electronic monitoring
ERF	-	Evidence Requirements Framework
ETP	-	Endangered, threatened, protected species
FAO	-	Food and Agriculture Organization
FNA	-	Fins naturally attached
LTL	-	Low trophic level species
P&L	-	Pole-and-line
P2	-	Principle 2 of the MSC Fisheries Standard
P3	-	Principle 3 of the MSC Fisheries Standard
PI	-	Performance indicator
PSA	-	Productivity Susceptibility Analysis
RBF	-	Risk-Based Framework
RFMO	-	Regional Fisheries Management Organization
RRA	-	Residual Risk Assessment
SG	-	Scoring guidepost
SI	-	Scoring issue
SICA	-	Scale Intensity Consequence Analysis
UoA	-	Unit of Assessment
UoC	-	Unit of Certification
VME	-	Vulnerable marine ecosystem

# Purpose and Scope of Report

The MSC Fisheries Standard v3.0 (hereafter “the Standard”) was published in 2022 following a five-year Fisheries Standard Review. Alongside the Standard, a new normative document was created – the MSC Fisheries Standard Toolbox (hereafter “the Toolbox”). The purpose of the Toolbox is to house a suite of mandatory and optional assessment tools and associated requirements for teams applying these as part of a fishery assessment against the Standard.

Throughout 2023, the MSC Executive held a series of international workshops and meetings with engaged stakeholders. Feedback received from stakeholders during these workshops, which sustained feedback received during consultations throughout the Fisheries Standard review, brought a number of substantive issues with the Standard and Toolbox to the attention of the Executive Committee. This included feedback that, in some cases, requirements in their current form may not deliver on MSC intent, and in other cases, requirements are perceived to be unfeasible for many currently-certified, high-performing fisheries.

The Toolbox Review was launched in July 2024 to reduce the complexity of the assessment process and ensure performance expectations for fisheries are set at appropriate levels. This review focuses on the Evidence Requirements Framework and associated monitoring requirements, and the Risk-Based Framework.

Proposals for changes to these sections of the Toolbox were put forward for a 60-day public consultation from July to September 2025 through an online survey. This report details the following:

- Participation data
- Summaries of feedback
- Next steps in the review process
- Detailed background on proposed revisions
- Feedback tables

The Toolbox Review has now been incorporated into the Fisheries Program Revisions and the stakeholder feedback will be considered as part of that process.

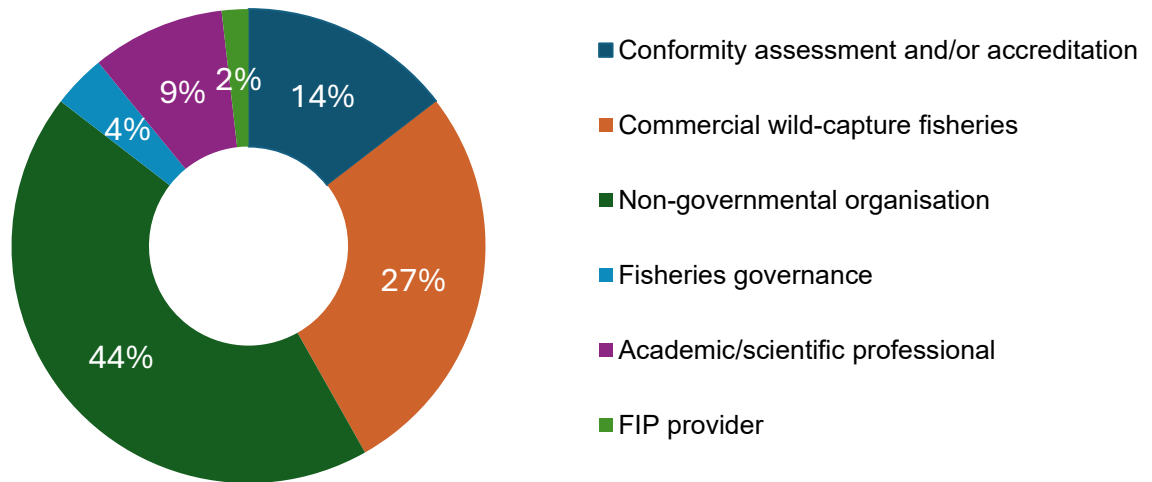
MSC consultations are designed to value authenticity, fairness and inclusivity, in an effort to generate strategic insight and build consensus. Our core principle is that consultations should be useful to the MSC in achieving its mission and useful to the participants in seeing how their views are considered. To achieve this, the MSC’s processes for consultation follow the [ISEAL Standard Setting Code of Good Practice](#) and the [FAO Guidelines for the Ecolabelling of Fish and Fishery Products from Marine Capture Fisheries](#).

ISEAL requires that participation is open to all stakeholders, and that the standard setter proactively seeks contributions from disadvantaged stakeholder groups. This is to ensure that contributors represent a balance of interests in the subject matter and in the geographical scope to which the standard applies.

# Participation Data

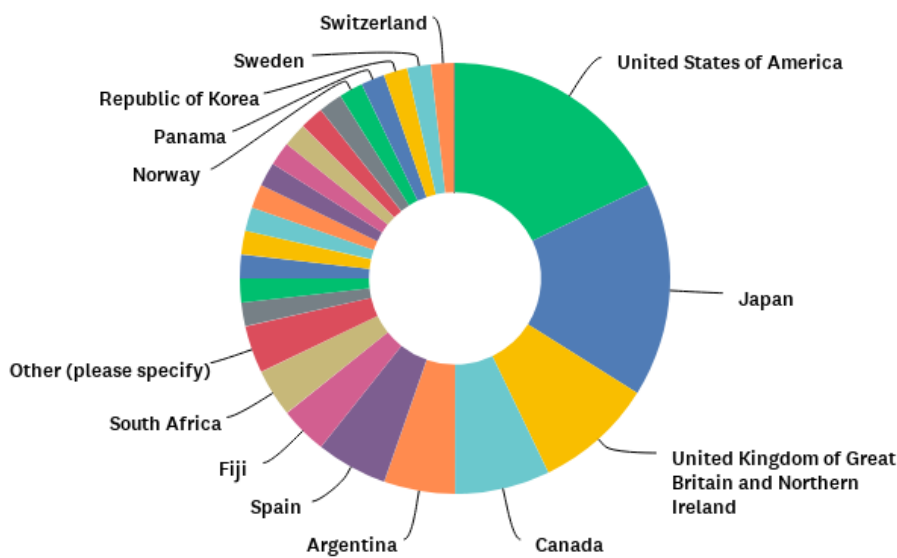
From July 10<sup>th</sup> to September 10<sup>th</sup> 2025, the revised Toolbox and monitoring requirements were presented for public consultation through the platform SurveyMonkey. The public consultation was launched alongside two stakeholder webinars, delivered to 321 attendees, and focused workshops with industry and eNGO stakeholders in Tokyo, Halifax, and Seattle. The consultation received responses from 56 stakeholders from over 20 countries.

**Figure 1.** Stakeholder categories of consultation participants.



The largest share of respondents came from non-governmental organisations (44%), followed by commercial wild-capture fisheries (27%). Participation from conformity assessment, fisheries governance, and academic professionals provided additional balance and diversity in perspectives.

**Figure 2.** Geographical distribution of consultation participants.



Participants represented over 20 countries, with the highest response levels from Japan, the United States, and the United Kingdom. Additional contributions across Europe, Asia, Africa, and the Americas illustrate the globally distributed interest in the proposed changes.

The survey was designed to collect information on specific criteria: clarity, simplification, acceptability, effectiveness in resolving policy issues, and feasibility for fishery partners.

Participants were asked to select whether they “Agree”, “Disagree”, or “Neither agree nor disagree” with statements that evaluate these criteria. In addition, the survey asked direct questions about particular changes (e.g., a new definition for “estimate”).

## **Data caveats**

The below text represents a thematic summary of comments by different stakeholder groups, with duplicate/pro-forma submissions noted, and treated as a single position rather than weighted by repetition. Analysis was completed using a combination of manual review to summarise the comments by groups, as well as using open access AI software to provide high level summaries or key themes. Detailed stakeholder consultation feedback is included in Appendices II to IV. Finally, it is worth noting that the stakeholder category ‘non-governmental organisations’ is not restricted to *environmental* non-governmental organisation and may also include others.

# Summary of Consultation Feedback

## Evidence Requirements Framework and scoring guideposts

Overall, stakeholder feedback on the revised ERF was mixed, reflecting different priorities and perspectives. Feedback from conformity assessment and accreditation bodies was largely positive, highlighting improved clarity, reduced prescriptiveness, and simpler implementation, while noting the need for training and calibration to ensure consistent application. Respondents from the commercial fishing industry generally welcomed the changes, finding the ERF clearer, more intuitive, and less burdensome, with greater flexibility for assessors to exercise judgment. Some noted potential uncertainties in interpretation, such as the determination of “objective” information, and the possibility of still longer assessment times.

NGOs however, expressed predominantly negative views, citing concerns over increased subjectivity, inconsistencies in assessing information accuracy, and weakened rigor. While a minority of NGOs acknowledged structural improvements and easier understanding, their feedback more frequently challenged whether the revised ERF improves clarity in practice. Most emphasised that without reintroduction of structured guidance and stronger quantitative requirements, the ERF may fail to ensure robust and transparent assessment.

Feedback from other stakeholder groups generally supported framing the ERF as a step-by-step procedure for evaluating evidence, with an emphasis that the effectiveness of these changes depends on how assessor judgement is exercised. Others focused on technical clarity, for example, requests for guidance on what constitutes an “estimate” and how independently verified, fisher-reported information would be treated across different fisheries.

Overall, simplification and clarity were seen as improvements by many stakeholders, but concerns about consistency remain a significant point of contention, particularly among NGOs.

On the changes to information scoring guideposts in the Standard, feedback from conformity assessment and accreditation bodies was generally positive and cautiously optimistic about the proposed changes, while also raising concerns about practical feasibility. The changes are thought to increase the level of expert judgement needed in assessments. Proper impact assessment of all the changes together was highlighted as a priority.

Fisheries respondents show strong alignment with the changes and emphasised that consistency should be improved as a result of these changes. Comments generally expressed that expert judgement is preferred over overly prescriptive requirements. Respondents also acknowledged these changes could be perceived as a lowering of the bar, and careful testing is needed of the changes. On the definition of “estimate,” several commercial fishery respondents supported the updated definition in combination with ERF changes. Other comments requested examples to understand how it would apply in data-limited contexts.

NGOs were strong in their opposition to the changes to scoring guideposts in the Standard, viewing them as a fundamental weakening of performance expectations. Core arguments focused on the definition of ‘estimate’, changing independent observation to verification, removing structured ‘degrees of accuracy’ from the scoring levels while increasing reliance on assessor judgement, and the perception that SG60 requirements are lower.

On compliance information guideposts, conformity assessment or certification bodies reported general support for the clearer requirements, although some raised specific implementation concerns. Many highlighted issues with obtaining sensitive quantitative data from management

authorities, and stakeholders asked for compliance-specific guidance that clarifies the type of information that is relevant and acceptable.

Overall, respondents shared an interest in clearer, more workable requirements, but differed on how much structure is needed to maintain consistency and rigour across assessments.

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## **Monitoring Requirements**

Stakeholder feedback was sought on changes to monitoring requirements, including where minimum monitoring expectations should sit across scoring levels (SG60, SG80, and SG100) and whether additional requirements for high seas fisheries and gear-type exclusions are appropriate.

Feedback from respondents representing conformity assessment and accreditation bodies was mixed. Some supported the removal of prescriptive monitoring thresholds at SG60 and SG100, noting that the adequacy of information would be evaluated through the ERF. Others warned this could make the performance expectations at SG60 less stringent unless there is strong training and calibration between assessors, as well as further impact assessment on the changes. CABs also asked for clearer guidance on what qualifies as independent verification and what “electronic monitoring” should mean in practice, noting that EM systems vary significantly in design, governance, review, and reliability.

On the proposal for at least 20% observer or EM coverage for high seas fisheries, some CABs viewed 20% as a reasonable expectation, while others questioned the rationale given the role of higher coverage in detecting rare events, and suggested clearer definitions of coverage for particular fisheries (e.g., defining longline coverage by hooks sampled rather than sets). Several CAB respondents did not support blanket gear exclusions from the 20% requirement, pointing to potential bycatch risks and suggesting EM makes coverage more feasible.

Commercial fishery respondents demonstrated support for the changes as improvements to feasibility, especially where previous thresholds were seen as difficult to meet for many currently certified, high-performing fisheries. They broadly accepted the principle that SG80 should involve independent verification of self-reported catch. They also asked for practical guidance on what verification systems would be considered sufficient, particularly for fleets with at-sea discards or for specific gear types (e.g., pole-and-line). Several commercial respondents emphasised that verification approaches need to reflect operational realities.

For the 20% coverage proposal for high seas fisheries, feedback from commercial fisheries was mixed but often centred on feasibility and clarity. Concerns included limited observer availability, costs of EM deployment and analysis, and uncertainty about how the requirement applies to fisheries that only occasionally operate outside national waters. A few respondents raised technical clarifications (e.g., what qualifies as “electronic monitoring” if systems do not use cameras) and practical concerns about crew acceptance of EM. Some also argued that fisheries already achieving very high coverage should be recognised at SG100 as best practice. On gear exclusions from the high seas requirements, commercial views were mixed: some favoured case-by-case, risk-based decisions; others argued for consistent requirements across fisheries to support fairness.

NGO responses were more critical of proposals that remove prescriptive monitoring thresholds at SG60 and SG100, and of shifting key monitoring expectations across scoring levels (e.g., from SG60 to SG80). Many NGOs argued the proposals could create scenarios where fisheries pass with

minimal independent, in-situ monitoring, may reduce incentives to improve monitoring over time, and increase inconsistency through greater assessor discretion.

NGOs frequently stated that independent verification and catch reporting should be minimum requirements at SG60, not SG80, and that “independent verification” should be clearly defined and include robust at-sea methods. Several called for numerical, science-based targets for independent verification (often suggesting higher coverage for rare species).

On the 20% coverage proposal, NGOs mostly opposed the reduction from 30% to 20%. Some supported 20% as a baseline but advocated stronger language encouraging higher coverage (e.g., 50–100%) over time, as well as eliminating exemptions that could reduce monitoring below 20% in practice. On excluding certain gear types from high-seas coverage requirements, many NGOs did not support a blanket exemption. Some said lower-risk gears could justify lower coverage, but still wanted some safeguards. Some NGO respondents suggested layering requirements (e.g., adding AIS/VMS expectations if onboard observation is not required).

Feedback from academic stakeholders emphasised that the adequacy of monitoring practices depends on risk, spatial/seasonal variation of the fishing effort, and the ability to detect rare events. Some viewed 20% coverage as too low for high seas industrial fisheries when considering rare interactions, and recommended at least ensuring sampling focuses on high-risk areas/seasons. Some also stressed that monitoring should include effort indices, not only catch, and pointed to the role of AIS or other positioning systems in understanding overlap with sensitive areas and species.

Other responses generally supported establishing a clear baseline (catch reporting plus independent verification), while emphasising that monitoring expectations should remain proportionate to risk and flexible in how they are met. At the same time, they generally framed independent verification as essential for credibility. A fisheries governance respondent highlighted the practical question of who can be considered an independent third party for verification.

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## **Risk-Based Framework**

Stakeholder feedback on the proposed RBF changes focused on three main areas: (1) clarifications on what counts as an “independent source” for triggering the RBF for ETP/OOS outcome; (2) changes to process and stakeholder engagement; and (3) the proposed Residual Risk Analysis (RRA) pathway in A5.2, including score modification criteria (Tables X and Y) and implications for accessibility.

CAB/assessor respondents generally welcomed the earlier integration of RBF scores and information into the Announcement Comment Draft Report (ACDR) and fishery announcement, noting potential benefits for transparency, reduced duplication of work, and improved stakeholder engagement. Respondents also raised practical and procedural issues (e.g., situations where the decision to use the RBF changes after a site visit). On the added clarification of what is meant by “independent source”, CABs tended to agree it helps, but raised feasibility concerns about timelines (e.g., commissioning studies and external review within condition timeframes).

Regarding A5.2, the score adjustment using the RRA approach, feedback from CABs was mixed. Some found the pathway clearer but potentially time-consuming. Others questioned whether criteria are workable for data-deficient species or ambiguous population size and definitions (global vs local). Some CAB comments also pointed to technical details needing refinement, including how to

interpret population status information and what kinds of information are permissible under the criteria.

Commercial fishery respondents generally accepted that the proposed RBF changes improved clarity. Some expressed concern over the clarification of “independent source” as possibly adding cost and complexity through additional layers of review. On changes to the stakeholder engagement process (A2.1–A2.3), commercial respondents largely supported streamlining and integrating the RBF announcement into earlier announcements.

The most consistent concern from commercial fisheries related to A5.2. Several respondents viewed the proposed entry criteria and score modification requirements (Tables X and Y and A5.2.1) as possibly unachievable, particularly within a five-year window. Some comments questioned requiring information about population status for score adjustment, stating that the purpose of the RBF is to score where such information may not be available.

NGO responses showed more support for clarifications intended to strengthen independence and transparency, including welcoming the additional guidance on “independent source” and early disclosure of information gaps and drafted RBF scores at the ACDR stage. NGOs also emphasised the need for safeguards to prevent inconsistent CAB interpretation (e.g., what constitutes acceptable peer review, and how “independence” is demonstrated).

On score adjustment in A5.2, NGO feedback was mixed. Some comments agreed the pathway could improve accessibility for fisheries, but a prominent concern was that the RRA may insufficiently account for cumulative impacts across multiple fisheries. Several NGOs argued that allowing score modifications when any one of A5.2.1 criteria is met is too permissive and advocated requiring all criteria to be met to allow a pathway for score modifications.

A second recurring NGO concern related to the wording of Tables X and Y, especially terms like “reduced” or “minimised” mortality, arguing that without clearer definitions, even modest reductions could be treated as sufficient for score uplift. Some NGOs also emphasised that adjustments should only occur where robust, independent, and long-term evidence shows UoA impacts are not hindering recovery. A smaller subset raised welfare-related considerations as a desirable addition to the risk assessment criteria.

Feedback from other stakeholder groups was limited but raised specific technical issues, including concerns that some information requirements or criteria are unclear. There were some suggestions that certain species groups (e.g., LTL contexts) may need more tailored treatment in risk tools.

# Steps Forward

All stakeholder input from the 60-day public consultation on the Toolbox Review was reviewed by MSC staff in the subsequent months. Individual comments were examined, and key themes and issues were carefully considered.

At the same time, the Toolbox Review became part of a wider body of work now known as the Fisheries Program Revisions, into which these findings were incorporated.

## The Fisheries Program Revisions

Formally launched in September 2025, the aim of the Fisheries Program Revisions is to address outstanding issues with the latest versions of the MSC Fisheries Standard, Toolbox, and Fisheries Certification Process and related program documents. The intended outcome of the project is to develop a package of revisions that resolve key concerns and ensure the MSC program continues to drive lasting progress towards ending overfishing.

The updated ERF, monitoring requirements, and RBF sections from the Toolbox Review are incorporated into this larger project. Earlier versions shared ahead of the 2025 public consultation, along with the feedback received, are informing the next steps in the Fisheries Program Revisions.

Before further versions of these documents are shared again for public comment, they will undergo several stages of pilot testing and impact assessments by panels of appointed experts. Mock assessments of MSC-engaged fisheries will also be conducted using the revised documents.

Another 60-day window for public consultation will open later in 2026, after which stakeholder feedback will be taken into account before a final 30-day public consultation ahead of publication in 2027.

If you have questions or requests for information on the ongoing development of the Toolbox and/or the Fisheries Program Revisions, please email [fisheries@msc.org](mailto:fisheries@msc.org).

# Appendix I: Proposed Changes to the Toolbox

The Toolbox Review was started in July 2024.

## **Evidence Requirements Framework and scoring guideposts**

### **Background**

The Evidence Requirements Framework (ERF) is a method included in the Toolbox for evaluating the information used to assess a fishery's sustainability against the Standard. Assessors are required to use the ERF for specific Performance Indicators within the Standard.

The objectives of the Toolbox Review included improving the clarity of the ERF and its alignment with the Standard. As a result, the review led to significant proposed changes to the structure and requirements of the ERF. The MSC also proposed changes to Performance Indicators in the Standard where the ERF was mandatory, in order to ensure consistency between the documents.

### **Proposal for the ERF**

The ERF remains a tool for assessors to evaluate evidence. However, the proposals refined the scope of the ERF to provide assessors with a clearer structure for undertaking and documenting that evaluation.

Requirements for fishery performance, such as requirements related to catch monitoring, were removed and placed back within the Standard.

To simplify the process of using the ERF, the proposal removed the multi-step scoring system of the original version, which included specific "trueness" and "precision" guideposts as benchmarks of information quality.

Under the proposal, assessors would still be required to directly consider the accuracy of information available about a fishery. The core concepts that define information accuracy were retained, as assessors must consider the objectivity, relevance, completeness, and consistency of information sources, as well as how any potential for bias was mitigated.

The consideration of accuracy would then inform the team's determination of whether information is adequate to meet the requirements of the Standard. Assessors would be required to document how they used the ERF to arrive at final scoring conclusions.

The proposal intended to improve transparency around when assessors should apply their expert judgement, given the wide range of real-world fishery contexts. It recognised that a higher level of accuracy is required where a fishery has a greater potential for impact. Conversely, for fisheries where assessors could reasonably justify that there is a lower risk of impact, the team could conclude that lower-quality information is still adequate to meet the requirements in the Standard. In all cases, these decisions would have to be clearly and robustly documented.

### **Proposal for information, compliance information, and shark finning guideposts in the Standard**

In Version 3 of the Standard, a fishery could pass certification without conditions if information was adequate to estimate the fishery's impact with a "high degree of accuracy" at the SG80 level or a "very high degree of accuracy" at the SG100 level. The ERF had set out requirements to enable an understanding of whether these guideposts had been met.

In the proposal sent for public consultation, the MSC proposed to remove references to “degrees of accuracy” from the scoring guideposts. Instead, assessors would consider accuracy as part of the process within the ERF, and the guideposts would centre on whether the information was “adequate to estimate” the fishery’s impact at SG80 and “adequate to estimate with a high degree of certainty” at SG100.

A key part of the proposal submitted for consultation was a definition for “estimate” in the context of Principles 2 and 3, which read: “to make a numeric approximation based on at least some quantitative data”. Under this definition, a fishery would be required to have at least some quantitative information to enable it to pass at SG80 or it would face a condition.

The proposal also sought to ensure continued accessibility for smaller-scale fisheries and fisheries with less potential for sustainability impacts. This was in response to concerns about their ability to meet the Version 3 requirements, and was achieved by allowing more room for the consideration of sustainability risks using expert judgement when scoring.

For compliance information guideposts, the proposal removed the reference to degrees of accuracy, refocusing the SG80 language on whether information is “adequate to estimate” compliance. Given the proposed definition of “estimate”, a pass without a condition would require quantitative information about compliance. At SG100, assessors would need to determine whether information is “adequate for a detailed understanding” of fishery compliance.

These changes aimed to highlight that assessors often need to build a picture of compliance in a fishery using both qualitative and quantitative sources of information. The changes also sought to acknowledge the complex, sensitive, and often difficult-to-access nature of compliance information, and recognising that even some of the world’s best monitoring systems may lack highly accurate data on compliance with certain regulations. At the same time, the changes enshrined the need for quantitative compliance data to achieve SG80.

The proposal did not change the requirement for fisheries to have either an FNA or non-retention policy for all sharks caught. Instead, it added focus on the information available and compliance with that policy. This was intended to more clearly reflect the MSC’s position that fisheries engaging in shark finning should not be eligible for certification.

Stakeholder feedback from public consultation on the ERF can be found in [Appendix II](#).

## **Monitoring Requirements**

### **Background**

The ERF v1.1 set out prescriptive thresholds that fisheries had to meet to achieve different scoring guideposts and pass certification. One requirement became particularly prominent to stakeholders: RFMO-managed fisheries on the high seas were expected to have independent observation covering at least 30% of fishing events per year.

The MSC reviewed these monitoring requirements as part of the 2024–2025 Toolbox Review. As part of that work, MSC commissioned an independent consultancy to examine widely adopted levels of monitoring coverage in 53 MSC-engaged fisheries spanning different gear types, operational scales, and regions. The study compiled information from MSC assessment reports and management agencies and compared multiple ways of defining coverage, including by trips, fleet proportions, gear deployments, and days at sea.

The study also reviewed electronic monitoring (EM) protocols, considered how different monitoring goals affect system design and outcomes, and surveyed existing methods of self-reporting, including

how verification is carried out and how frequently third-party checks occur. This report built on earlier MRAG UK work on optimal observer coverage levels, and the findings informed MSC's proposed changes.

## **Proposal for monitoring requirements**

The proposed changes maintained core expectations for all fisheries. To achieve an information score of SG80 for (i) in-scope species and (ii) endangered, threatened, and protected species or out-of-scope species (ETP/OOS), fisheries would need to have:

- Self-reporting of catch to relevant management authorities, and
- A system enabling independent verification of that catch data.

For fisheries operating on the high seas (areas outside national jurisdiction) the proposal contained an additional requirement at SG80 for information on ETP/OOS species: at least 20% independent observation of fishing events (via at-sea observers or EM).

An exemption was proposed for vessels using pole-and-line, troll, or handline gear on the high seas. These fisheries would not be subject to the 20% threshold but would still be required to meet the self-reporting and verification requirements.

No prescriptive monitoring requirements were proposed at SG60 or SG100.

Stakeholder feedback from public consultation on the monitoring requirements can be found in [Appendix III](#).

## **Risk-Based Framework**

The proposed changes to the RBF sought to address three areas: 1. Improving clarity and reducing inconsistencies; 2. Simplifying stakeholder involvement in the RBF process; and 3. Improving scoring in the Productivity Susceptibility Analysis (PSA) by providing clearer criteria for adjusting scores.

### **1. Clarifications to improve inconsistencies**

Two main proposals to improve clarity and reduce inconsistencies in the RBF were presented for public consultation in July 2025.

The first proposal was to provide further guidance as to when the RBF is mandatory to score the Performance Indicator on ETP/OOS outcome. The original Toolbox lacked clarity on what qualifies as an 'independent source' of data and therefore required further guidance on the MSC's intent for triggering the RBF for ETP/OOS species.

The second proposal was to clarify how the RBF interacts with the default tree in the Standard. In the Toolbox v1.2, when the RBF is used to score Principle 2 outcome Performance Indicators, the related management Performance Indicators are scored as normal, without referencing RBF-specific attributes. The proposed changes clarify that assessors should consider how the management strategy minimises impact on the species within the context of relevant risk attributes.

### **2. Stakeholder involvement**

The RBF process can be complicated and time-consuming, often requiring repeated input from stakeholders involved in multiple fisheries. The proposed changes aimed to streamline engagement and increase flexibility in order to reduce stakeholder fatigue.

### **a. Streamlining stakeholder engagement**

The Toolbox v1.2 provides detailed steps for stakeholder involvement in the RBF, beginning with a separate RBF announcement at the Fishery Announcement stage. Assessors gather information before the site visit and discuss how it will inform scoring with stakeholders during the visit. If, during the visit, the need to use the RBF is identified, then a new announcement, an additional 30-day consultation period, and another site visit are required. Final RBF scores are first shared in the Public Comment Draft Report.

The proposal simplifies the process by including the RBF announcement in the template for the Fishery Announcement. Assessors would gather scoring information before the Announcement, rather than before the site visit. This information would be included in the Announcement Comment Draft Report to highlight data gaps or provide draft scores, giving stakeholders earlier visibility into areas where input may be needed. The information and input from stakeholders would then be discussed at the site visit.

If the need to use the RBF is identified after the Announcement, the original RBF announcement form would still be used, but an extra site visit would no longer be required. Instead, assessors would consult stakeholders through the most suitable method, with a 30-day consultation period.

### **b. Increasing flexibility in stakeholder engagement**

One cause of stakeholder fatigue is the rigid process for collecting RBF-related input. Assessors must currently consult a wide range of stakeholders via in-person or remote meetings, with no flexibility to use other methods. There is also no requirement to describe the consultation strategy in assessment reports, limiting transparency. When stakeholders don't reach consensus during discussions, assessors must apply a precautionary approach to scoring.

The proposal makes stakeholder consultation more flexible and less prescriptive. Instead of always requiring broad participation, assessors must engage stakeholders with relevant fishery or scoring knowledge. The requirement for mandatory meetings is removed, allowing assessors more freedom to choose the most effective engagement methods. To improve transparency, assessors must describe their consultation strategy in assessment reports. The proposal places emphasis on the use of objective evidence from stakeholders, while still emphasising the need for the precautionary approach where information is limited or uncertain.

## **3. Using an optional Residual Risk Analysis to adjust scoring element scores when using the PSA**

The PSA is a tool used to assess species vulnerability to fishing pressure by evaluating the species' productivity and susceptibility to capture or harm. It is used in data-deficient situations to score the in-scope and ETP/OOS species outcome Performance Indicators.

The PSA is designed to be more precautionary than the Standard's default tree. However, there are concerns that current requirements may sometimes be overly conservative, especially for low-productivity species. Even with strong management and low susceptibility, PSA scores can still be low, making it difficult for fisheries to create action plans to address conditions and demonstrate improvements.

Assessors can currently adjust PSA scores when evidence supports doing so. For birds, mammals, reptiles, and amphibians, assessors can lower certain susceptibility scores if mitigation measures are in place<sup>1</sup>. Additionally, for all species, assessors can adjust a PSA-derived score by up to 10 points if justified by additional information<sup>2</sup>. However, unclear guidance on what qualifies as

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<sup>1</sup> Fisheries Standard Toolbox v1.2 - Clauses A4.4.7.1.a and A4.4.8.1.a

<sup>2</sup> Fisheries Standard Toolbox v1.2 - Clause A5.3.1.1

“additional information” makes these adjustments difficult to audit and often insufficient to address conditions despite effective management.

The proposal introduced an optional, Residual Risk Analysis (RRA) tool to support PSA score adjustments. Based on Australia’s ecological risk assessment procedure, it allows PSA scores to be raised when specific, clearly defined criteria are met.

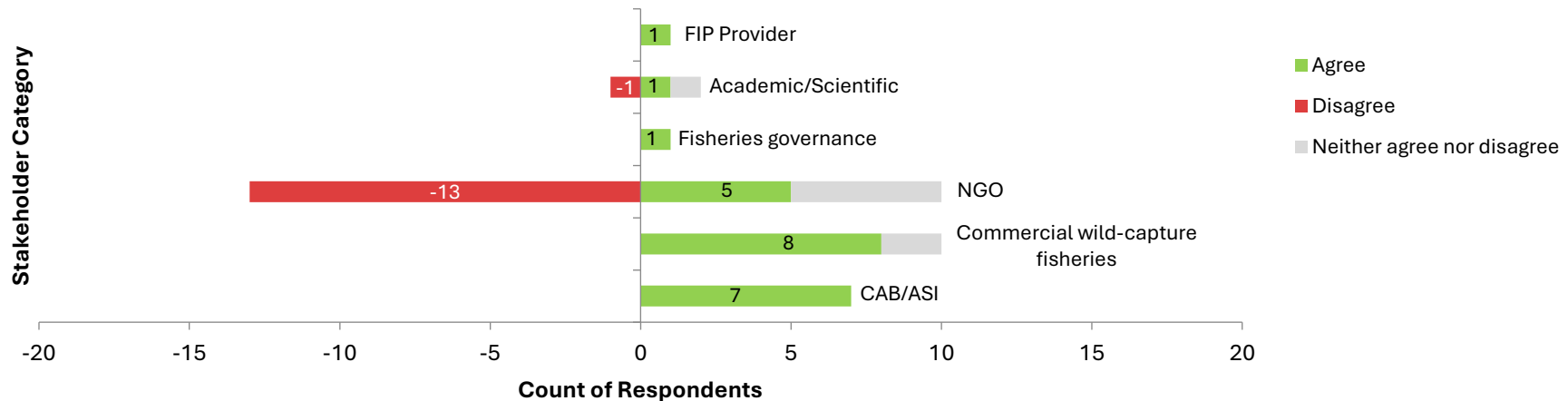
To use the tool, a species must first be shown to have a stable or increasing population. If eligible, assessors consider the three defined criteria in the RRA tool. These criteria reflect the effectiveness of management measures at reducing the inherent risk of a species to fishing. All criteria must be met to adjust a score – raising scores from below 60 to 60, or scores from 60-79 to 80. The tool’s use is limited in subsequent assessments. This approach aligns with standard RRA practice: assess inherent risk first, then consider mitigating measures that reduce that risk.

The proposal limited susceptibility scoring for ETP/OOS species to inherent risk only, removing the option to factor in mitigation measures directly in the PSA. These measures would instead be assessed through the RRA. The option to adjust scores by 10 points would also be removed, with the RRA providing a more robust and auditable alternative.

Stakeholder feedback from public consultation on the RBF can be found in [Appendix IV](#).

# Appendix II: Stakeholder consultation feedback, Evidence Requirements Framework

“The proposed changes improve the clarity of the ERF.”



Feedback received		
Respondent ID	Stakeholder Category	Comments
114935854975	Conformity assessment and/or accreditation body	Agree. Clarity is improved but we still have questions and considerations regarding application and how it acts as a ‘framework.’ The link between the ERF and the different levels of scoring guideposts is weak and leaves room for significant subjective interpretation. This could be improved by inserting the ERF into the scoring table template in a way that assists assessors in applying it. Otherwise, we think it will be applied inconsistently.

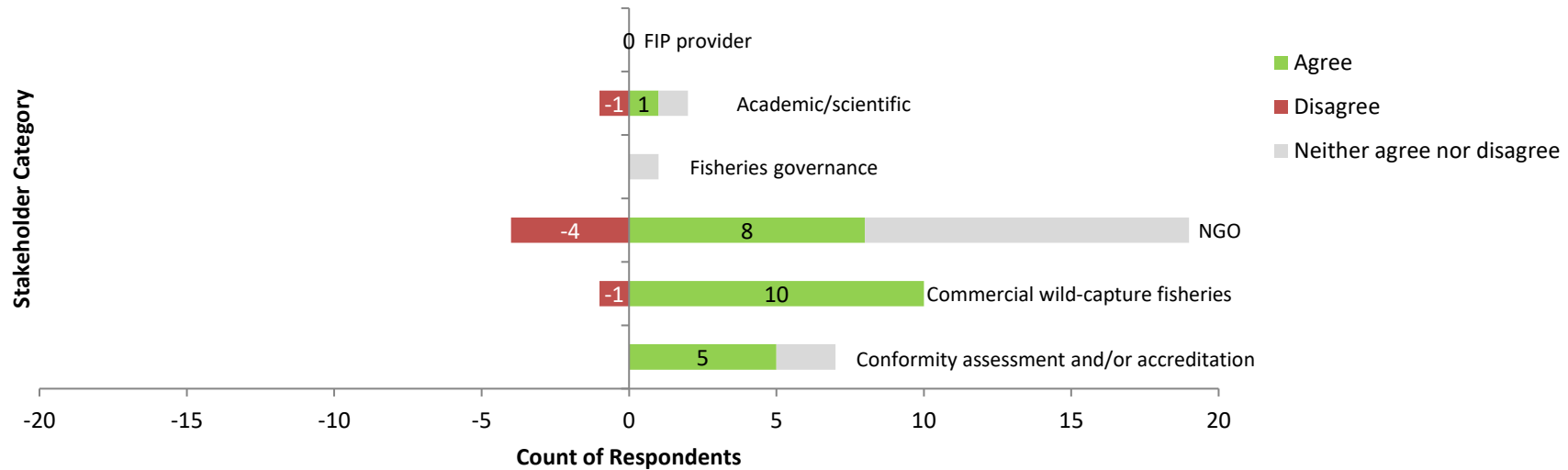
<b>114935220378</b>	Conformity assessment and/or accreditation	I was impressed by the changes made to the ERF. While the toolbox requirements have been greatly simplified, the new ERF provides the means to make assessments more robust, forcing assessors to consider all potential weaknesses in the available data and information, without being overly burdensome.
<b>114931975029</b>	Conformity assessment and/or accreditation	<p>What does MSC mean in terms of B2.1.1aiii and the terms 'all relevant elements and dimensions.' this isn't referring to scoring elements as per the GB3.1.2a? its referring to space and time so perhaps a better term is required? Why not just use space and time?</p> <p>In B41.4 how should a team determine the greater or lower 'potential' of UoA impact.</p> <p>Triangulation (B5.1.1b) doesn't get any guidance in Tool B but the guidance in v2.01 in GSA3.6.3 is good , please include in Tool B guidance.</p>
<b>114926778971</b>	Conformity assessment and/or accreditation	It is clear that the ERF is less prescriptive, and clarity achieved by not equating a TG or PG score to SG scores
<b>114935985271</b>	Commercial wild-capture fisheries	114935985271 appreciates the proposed changes to the ERF, especially MSC's decision to reinsert requirements for fishery performance into the Fishery Standard itself. In our view, the ERF should be a document that informs, rather than prescribes, scoring outcomes. We believe MSC has met this goal with the proposed changes to the ERF. We initially had strong concerns about the ERF requirements laid out in version 3.0, as it was unclear whether longstanding-certified fisheries in Alaska with a demonstrated record of sustainability would be able to meet the requirements.
<b>114935328811</b>	Commercial wild-capture fisheries	We agree with and support the comments of the Association of Sustainable Fisheries.
<b>114935030286</b>	Commercial wild-capture fisheries	The ASF is generally very supportive of the changes to the ERF. What was set out originally in v.3.0 was highly complex and prescriptive, and was difficult to relate to the scoring requirements it was intended to inform. What is there now is clearer, less prescriptive and more intuitive. The much improved clarity also seems likely to better address the issue of consistency in assessments that the ASF has been concerned about previously. In summary, we are keen that the ERF supports greater consistency across assessments (allowing for the

		<p>difference in performance that can and should exist between fisheries based on scale and intensity (i.e., risk), and the new ERF seems much more likely to do that.</p>
<b>114934899083</b>	Commercial wild-capture fisheries	NFA is supportive of the ERF changes, and the goal to improve clarity seems to have been achieved.
<b>114930258485</b>	Commercial wild-capture fisheries	There is more clarity regarding the type of documents that assessors can take into consideration.
<b>114935742704</b>	Non-governmental organisation	<p>We are concerned that the removal of structured guideline and guideposts for Scorings, particularly the removal of "different degrees of accuracy", will lead to inconsistent interpretations of information accuracy across CABs. For example, there is no longer guidance on what type of information could be considered as "high", "medium" or "low" Accuracy.</p>
<b>114935680642</b>	Non-governmental organisation	<p>While the Marine Stewardship Council (MSC) states the proposed changes to the Evidence Requirements Framework (ERF) aim to "refine the scope of the ERF to provide assessors with a clear structure", and the simplification "can improve clarity of the assessments", significant concerns are raised that suggest a potential reduction in overall clarity and consistency in practice.</p> <p>A major concern is the effects of the removal of the multi-step scoring system and references to "degrees of accuracy" from scoring guideposts. This means the new "Consideration of information accuracy" can be interpreted very differently between specific assessors and CABs, leading to fears of inconsistency between assessments. There is no indication or ranking for what constitutes "high," "medium," or "low" accuracy, removing previous guidance that helped ensure consistency.</p> <p>Moreover, the changes allow more room for expert judgment when scoring, which is feared to introduce more uncertainties and loopholes to the standard and potentially increase disagreements and challenges to certification. We suggest reintroducing some structured guidance to reduce reliance on expert judgment and ensure robust data at all scoring guideposts. Despite the stated</p>

		objective, the changes could undermine clarity through increased subjectivity and varied interpretations.
<b>114935583787</b>	Non-governmental organisation	<i>Duplicate of 114935680642</i>
<b>114935680642</b>	Non-governmental organisation	<i>Duplicate of 114935680642</i>
<b>114935463463</b>	Non-governmental organisation	114935463463 welcomes the ERF concept as a step in the right direction and supports the intent to improve documentation of evidence. However, the proposed changes do not improve clarity. By removing explicit trueness and precision benchmarks, the framework introduces more subjectivity. Key concepts such as evidence hierarchies, provenance, independence, uncertainty, and reproducibility remain undefined. Without binding templates and auditable evidence matrices in the PCDR/FDR, CAB decisions will remain opaque and inconsistent.
<b>114935402174</b>	Non-governmental organisation	By reducing the fine detail of evaluation (step by step), the assessment structure is not improved. On the contrary, it weakens these processes by omitting information/details that can help reduce uncertainty in the scoring process. Rather than simplifying, eliminating multi-step processes leaves room for interpretations not based on clear evidence.
<b>114935167081</b>	Non-governmental organisation	<i>Duplicate of 114935680642</i>
<b>114935145363</b>	Non-governmental organisation	<i>Duplicate of 114935680642</i>
<b>114935002422</b>	Non-governmental organisation	Clarity, objectivity and reliant assessment of stocks are needed.
<b>114934996080</b>	Non-governmental organisation	<i>Duplicate of 114935680642</i>
<b>114934471709</b>	Non-governmental organisation	<i>Duplicate of 114935680642</i>
<b>114921832004</b>	Non-governmental organisation	While the revised ERF does improve structure and clarity for evaluating sustainability evidence, it does not encourage or require collection of animal welfare-related indicators such as injury, vitality, or survival of non-retained species. These factors, although outside MSC's current scope, directly

		influence both ethical outcomes and ecosystem health. We encourage MSC to consider integrating prompts for welfare-relevant data, in line with consumer expectations and complementary initiatives such as the Model Seafood Welfare Standard and the Global Dialogue on Seafood Traceability's welfare extension framework.
<b>114934041597</b>	Non-governmental organisation	There is a reduction in overall clarity of the ERF. Removal of the multi-step scoring system opens the standard to inconsistency in use by CABs.
<b>114935167081</b>	Non-governmental organisation	<i>Duplicate of 114935680642</i>
<b>114925202249</b>	Non-governmental organisation	The revised ERF appears to improve structure and clarity for assessing sustainability, however it does not require or encourage the collection of data on animal welfare relevant indicators, such as injury, vitality, or the survival of non-retained species. These factors, while outside MSC's current scope, materially affect both ethical outcomes and ecosystem health. We encourage MSC to consider integrating explicit prompts for information on welfare-related data, which would align with consumer expectations as well as other efforts such as the animal welfare extension framework at the Global Dialogue on Seafood Traceability (ongoing).
<b>114899462711</b>	Non-governmental organisation	The introduced changes significantly improve the ease of applying the ERF principles. The examples provided help better guiding the CABs and stakeholders through the process.
<b>114935727997</b>	Academic/scientific professional	<p>The proposed changes make even more subjective what information would be considered in the context of th ERF and considered as "adequate".</p> <p>In particular, additional clarity is necessary on alternative measures for unwanted catch. It should be made clearer that this entails implementation not solely review of measures, and measures do not substitute any efforts from the fishery to reduce and where possibly eliminate bycatch via e.g., gear modifications and mesh sizes, spatial and seasonal closures, etc.</p>
<b>114935339306</b>	FIP provider	Framing the ERF as a step-by-step procedure for evaluating evidence is a positive change.

**“The proposed changes simplify the ERF.”**



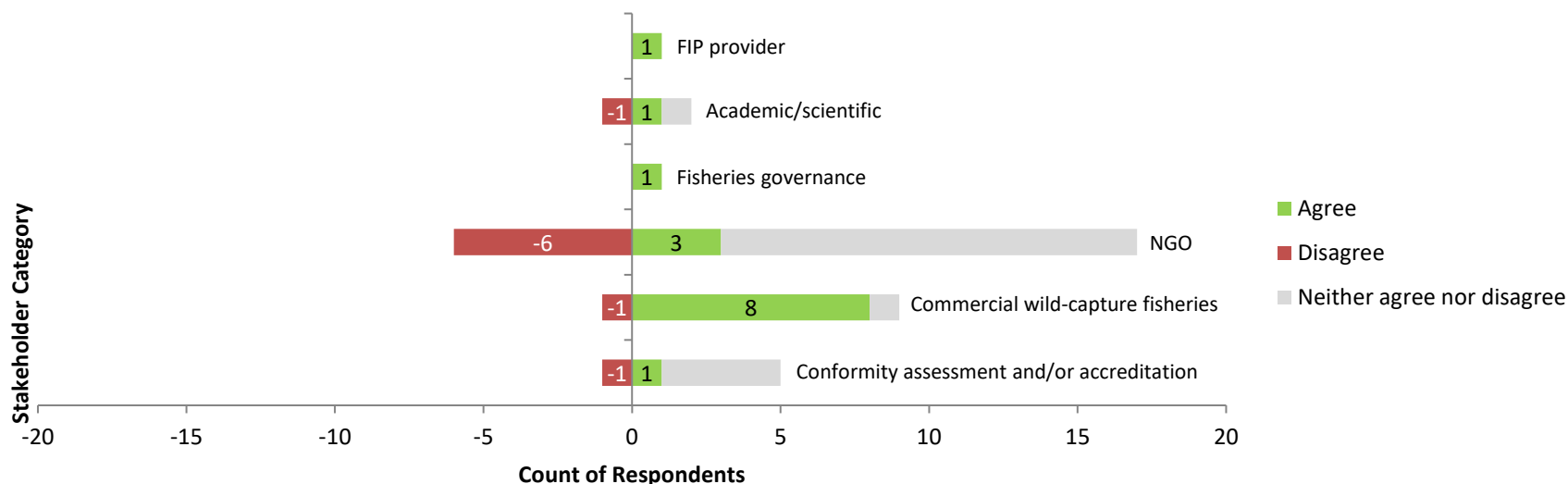
Feedback received		
Respondent ID	Stakeholder Category	Comments
114935854975	Conformity assessment and/or accreditation body	Removal of the TG and PG tables has greatly simplified the process.
114935220378	Conformity assessment and/or accreditation body	100% agree. The initial ERF was - while ambitious in its intent - sadly too difficult to implement. The simplification will ensure a more consistent adoption by assessors.
114931975029	Conformity assessment and/or accreditation body	This is far better version than the old one
114926778971	Conformity assessment and/or accreditation body	Less interplay between ERF and Standard
114905584606	Conformity assessment and/or accreditation body	See comment above

<b>114934879929</b>	Commercial wild-capture fisheries	if the proposed changes replace a multi-step scoring system and replace it with a system by which assessors consider certain aspects of the information sources, then I agree that the ERF will be simplified
<b>114935328811</b>	Commercial wild-capture fisheries	We agree with and support the comments of the Association of Sustainable Fisheries.
<b>114935030286</b>	Commercial wild-capture fisheries	The ERF as presented previously in v.3.0 was highly complex, with a requirement to construct a score for each element by referring to up to seven different tables within Tool B, with different approaches taken for different scoring components. The new approach is clearer, simpler and more intuitive. It is indicative that the old ERF with the guidance section took up 18 pages of the Toolbox, while the new ERF with guidance takes up just four pages.
<b>114930478442</b>	Commercial wild-capture fisheries	Similar to above comment, it is unclear.
<b>114935742704</b>	Non-governmental organisation	On its face, the proposal appears to simplify the ERF and improve flexibility for assessors; however, providing "more room for expert judgement while scoring" introduces uncertainty into the Standard, which risks increases the probability of disagreements between Stakeholders and Assessors in the long-term. Thus, consideration and ultimate determination of ERF outcomes will become more complicated as a result of the proposed simplifying changes.
<b>114935713917</b>	Non-governmental organisation	These changes likely simplify the ERF but do not necessarily make it better. They remove the structured guidance and guideposts for scoring. The simplification can lead to increased assessor bias and discrepancies between CABs on how fisheries are assessed. Please see specific examples below. The removal of different degrees of accuracy – could lead to assessors interpreting information very differently.
<b>114935698418</b>	Non-governmental organisation	Noting that simplification in this sense does not equate to improvement, nor ensuring that certified fisheries are meeting environmental best practice.
<b>114935680642</b>	Non-governmental organisation	We acknowledge that the simplification of the ERF is understandable and can help improve clarity of the assessments. Practically, this simplification involves the removal of the multi-step scoring system of the original ERF, which included specific 'trueness' and 'precision' guideposts for information quality. Furthermore, references to "degrees of accuracy" from the scoring guideposts have been removed. However, it's important to note that while the structure is simplified by removing these detailed guideposts, the subsequent reliance on broader "Consideration of information accuracy" and increased room for expert judgment when scoring

		introduces new complexities in application and raises concerns about inconsistency rather than straightforward simplification in practice.
<b>114935583787</b>	Non-governmental organisation	<i>Duplication of 114935680642</i>
<b>114935537358</b>	Non-governmental organisation	<i>Duplication of 114935680642</i>
<b>114935463463</b>	Non-governmental organisation	114935463463 does not see simplification in the proposed redraft. Moving performance requirements back into the Standard shifts wording but does not reduce complexity for stakeholders. The removal of minimum coverage thresholds and replacement with ambiguous terms such as “adequate to estimate” or “high degree of certainty” increases interpretive burden. Instead of simplifying, the proposals risk lowering expectations while creating more ambiguity for CABs and stakeholders.
<b>114935402174</b>	Non-governmental organisation	As mentioned above, removing detailed evaluations may seem to simplify the process and the work of assessors, but it takes away truthfulness and robustness from the assessments.
<b>114935167081</b>	Non-governmental organisation	<i>Duplication of 114935680642</i>
<b>114935145363</b>	Non-governmental organisation	<i>Duplication of 114935680642</i>
<b>114935002422</b>	Non-governmental organisation	The more valid basis for assessment, the better evaluation and prediction for stocks.
<b>114934996080</b>	Non-governmental organisation	<i>Duplication of 114935680642</i>
<b>114934471709</b>	Non-governmental organisation	<i>Duplication of 114935680642</i>
<b>114921832004</b>	Non-governmental organisation	The proposed changes simplify the ERF by removing the multi-step trueness/precision scoring and instead focusing on objectivity, relevance, completeness, and consistency of information. However, further simplification could come from adding clearer guidance on how expert judgment should be applied across different fishery contexts, to ensure consistency among assessors.
<b>114934041597</b>	Non-governmental organisation	Removal of 'trueness' and 'precision' guidance detract from clarity, rather than ensure simplicity.
<b>114933972264</b>	Non-governmental organisation	<i>Duplication of 114935680642</i>

<b>114899462711</b>	Non-governmental organisation	The elimination of set guidepost for determining accuracy, trueness and precision should greatly improve the implementation of the ERF principles.
<b>114935727997</b>	Academic/scientific professional	Although it may seem so at first, less information, especially of quantitative nature, a smaller coverage of observers, and subjectivity in assessing and scoring relevant information by the CAB would ultimately complicate the process and streamlining across different areas and fisheries.
<b>114935339306</b>	FIP provider	I understand the intent of the revision to simplify the process of using the ERF but until I am able to see its application in real world situation of MSC assessment I cannot evaluate whether it meets that intent. A simulation of an assessor putting this redrafted ERF into practice would be very appreciated.

**“The process set out in the ERF for assessors to consider information accuracy and adequacy will be effective in ensuring rigorous and transparent assessment of the evidence used in fishery assessments.”**



Feedback received		
Respondent ID	Stakeholder Category	Comments
114935854975	Conformity assessment and/or accreditation body	Although we agree that the process set out in the ERF will require assessors to consider information accuracy and adequacy, the effectiveness in ensuring rigorous and transparent assessments is in question because the application is quite qualitative and open to interpretation. The link between the ERF and definitive scoring guideposts continues to be subjective.
114935220378	Conformity assessment and/or accreditation body	While I'm very much in favour of the new ERF, I do believe a more consistent training and calibration programme should be developed to ensure its effectiveness.
114931975029	Conformity assessment and/or accreditation body	This needs to be explicitly tested and i cannot provide an 'accurate' answer to this without undertaking a pilot test on this
114926778971	Conformity assessment and/or accreditation body	Not all scoring rationales for all relevant PIs will include a systematic breakdown of information adequacy because not all assessors are created equal nor are all CABs as systematic in their review. The onus will fall on the PRC to enforce

		complete scoring rationales and not all Peer Reviewers are interested in reviewing in depth the PIs that are outside of their expertise.
<b>114905584606</b>	Conformity assessment and/or accreditation body	I think it will be tricky and challenging at the beginning. Rigorous? Maybe if we all understand the requirements to be applied in the same way
<b>114935985271</b>	Commercial wild-capture fisheries	In general, 114935985271 agrees that the process set out in the ERF for assessors to utilize will be effective in ensuring rigorous and transparent assessment of evidence used in fishery assessments. We do have concerns about how assessors will consider the objectivity of data that may be collected by, or in partnership with, fishery participants themselves. Fishery data collection in the United States is significantly affected by funding levels for management agencies. In cases where specific data is needed to help better understanding stock abundance, fishery performance, or impacts to ETP species / habitat, fishery participants in Alaska have often stepped up to partner with agencies for innovative research efforts. With greater uncertainty around federal funding for fishery science and the recent reduction in agency staff, we expect that industry partnerships to support fishery science and backfill unmet research needs will increase in the future. Our hope is that these efforts will not be considered “subjective” by assessors if they have clear data protocols, objective sampling design, and measures in place to address bias and ensure objectivity. 114935985271 supports assessors having the discretion to consider the objectivity of data, and our hope is that the revised ERF will allow for research partnerships with the fishing industry to meet the criteria for objective data where appropriate.
<b>114934879929</b>	Commercial wild-capture fisheries	I think allowing assessors that latitude to determine 1) the quality of the data sources and 2) the possible risk profile associated with the fishery allows for a greater chance of rigorous and transparent assessments occurring.
<b>114935328811</b>	Commercial wild-capture fisheries	We agree with and support the comments of the Association of Sustainable Fisheries.
<b>114935030286</b>	Commercial wild-capture fisheries	Without seeing the ERF being applied in practice across a variety of different CABS, assessors and fisheries, it is possibly too early to say we are completely confident that the new ERF process will deliver consistently rigorous and transparent assessments. However, we believe the process has better potential than the current approach under v.2.01, and greatly improves upon the v.3.0 ERF, which was so complex that it ran the risk of obfuscating the reality of a fishery’s situation, and would almost certainly lead to inconsistent application. Although there remains the possibility that assessors may take somewhat

		different approaches to scoring information between fisheries, we have general confidence in the assessor and CAB community and the system of review that exists within MSC assessments, and believe it likely that any variability can be settled relatively quickly.
<b>114934071628</b>	Commercial wild-capture fisheries	In the current EM minimum standard (for example, at ICCAT), COC country can review EM data and provide as evidence. However, in some country, the government uses the old human observer dispatch organization to conduct the review utilizing existing personnel, both for not dismiss existing workers and budget shortage. Then, the EM data reviewed by government can not be completely considered a 3rd party data, whilst this is following the RFMO rule. Can MSC consider it as 3rd-party, transparent data? In some country where there is corruption, government do not provide full data, but summarized data - which may be arbitrary treated. MSC auditors normally has no way to determine if it is accurate. Child labor issues also needs more
<b>114930478442</b>	Commercial wild-capture fisheries	I feel that this leaves a lot of space for interpretation to assessors and lead to differences in scoring between assessors.
<b>114930258485</b>	Commercial wild-capture fisheries	It is noted “assessors would be expected to require higher quality information or apply more precaution when scoring fisheries that are likely to have greater impacts and sustainability risks”. This sentence does not guarantee fair and transparent scoring between different fisheries.
<b>114936142847</b>	Non-governmental organisation	I am afraid that these new procedures will elevate the costs (they are more time consuming) and not sure the quality of the information will really be higher, except maybe for the high seas.
<b>114935742704</b>	Non-governmental organisation	As noted in previous answers, the proposed changes eliminate previously available guidance and guideposts to guide Assessors in their scoring of information accuracy and adequacy (e.g., "Table GB1 Examples of information sources relevant to the information categories"). As such, there is a serious risk of inconsistency in scoring of information accuracy and adequacy between Assessors, which will lead to reduced transparency of decision making. These changes may also undermine assessment rigor if Assessors categorize low accuracy information as medium or high accuracy, due to lack of guidance.
<b>114935713917</b>	Non-governmental organisation	We feel this is a step backwards from what was originally included in V3.0 – which strengthened the standard by creating a more standardized system. Separating out where “adequate” and “accuracy” are does not make any sense. This should be kept together for consistency amongst assessors and scoring.

		We also believe the removal of the multi-step scoring system is a negative change.
<b>114935698418</b>	Non-governmental organisation	<p>The MSC has stated that the ERF is intended to “inform, rather than prescribe” scoring. Therefore, the inclusion of degrees of accuracy within the ERF is insufficient to ensure that assessors have thoroughly considered all available evidence, and its accuracy, bias, etc. when making decisions. The proposed changes will continue to lead to inconsistencies between CABs in terms of how they consider and evaluate available information regarding a fishery’s environmental impact.</p> <p>Reintroduce some structured guidance or a clearer scoring system to reduce reliance on "expert judgment" and mitigate risks of inconsistency, thereby preventing a "race to the bottom" through varied interpretations. Strengthen requirements for quantitative data at lower Scoring Guideposts (e.g., SG60), moving beyond merely "broadly understanding" the impact, to ensure a more robust understanding of impacts.</p>
<b>114935680642</b>	Non-governmental organisation	<p>It would be difficult to agree that the process set out in the ERF for assessors to consider information accuracy and adequacy will be effective in ensuring rigorous and transparent assessment of the evidence used in fishery assessments.</p> <p>While the MSC states the proposed changes aim to refine the scope of the ERF and improve clarity of the assessments, those same changes might undermine its effectiveness in ensuring rigour and transparency.</p> <p>With the removal of the multi-step scoring system and specific 'trueness' and 'precision' guideposts, as well as the removal of references to "degrees of accuracy" from scoring guideposts. This means the "new “Consideration of information accuracy” can be interpreted very differently between specific assessors and CABs. There is a lack of indication or ranking for "high," "medium," or "low" Accuracy, increasing reliance on assessors judgment. This introduces further uncertainties and loopholes to the standard and could dilute the sustainability requirements of the MSC Standard.</p>
<b>114935583787</b>	Non-governmental organisation	<i>Duplicate of 114935680642</i>
<b>114935537358</b>	Non-governmental organisation	<i>Duplicate of 114935680642</i>
<b>114935463463</b>	Non-governmental organisation	114935463463 welcomes the ERF concept as a step in the right direction and supports the intent to improve documentation of evidence. However, the proposed changes do not improve clarity. By removing explicit trueness and precision benchmarks, the framework introduces more subjectivity. Key

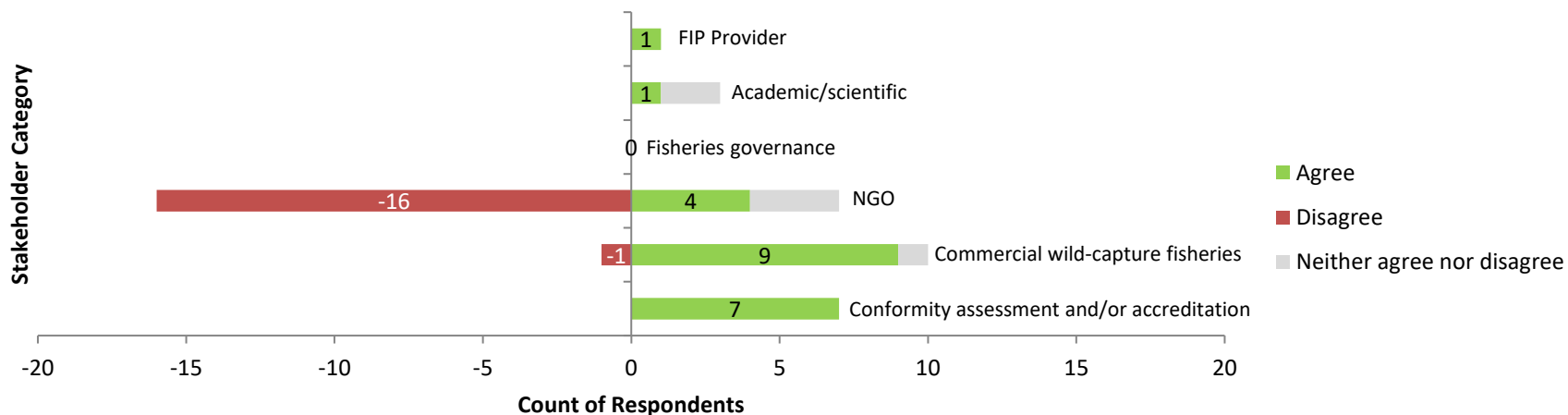
		<p>concepts such as evidence hierarchies, provenance, independence, uncertainty, and reproducibility remain undefined. Without binding templates and auditable evidence matrices in the PCDR/FDR, CAB decisions will remain opaque and inconsistent.</p>
<b>114935402174</b>	Non-governmental organisation	<p>The proposed changes to the Evidence Requirements Framework (ERF), while presented as a way to improve clarity, risk undermining the rigour and transparency of fishery assessments. By removing the multi-step scoring system, the framework weakens its ability to ensure consistent and evidence-based evaluations. The absence of clear rankings for accuracy forces greater reliance on assessor judgment, creating loopholes, inconsistencies, and uncertainties. These weaknesses in the scoring system could ultimately dilute the effectiveness of the MSC Standard in safeguarding sustainability.</p>
<b>114935201693</b>	Non-governmental organisation	<p>The proposed changes do not ensure transparent scoring and rationales, as they do not require full documentation of the CABs considerations and determinations, as CABs would only need to document their determination on the accuracy of the collective information. B5.1.1a should be revised to read: "A consideration of accuracy of each source of information used to determine adequacy, including their objectivity, relevance, completeness, and consistency". This would ensure that comprehensive written documentation exists of the considerations that led to the CAB's determination of adequacy, instead of a general statement on the adequacy of the collective information. This would also allow peer reviewers, MSC technical oversight, and stakeholders to evaluate if the CAB had followed the requirements of the ERF</p>
<b>114935167081</b>	Non-governmental organisation	<i>Duplicate of 114935680642</i>
<b>114935145363</b>	Non-governmental organisation	<i>Duplicate of 114935680642</i>
<b>114934996080</b>	Non-governmental organisation	<p>With the removal of the multi-step scoring system and specific 'trueness' and 'precision' guideposts, as well as the removal of references to "degrees of accuracy" from scoring guideposts, the "new "Consideration of information accuracy" can be interpreted very differently between assessors and CABs. The lack of indication or ranking for "high," "medium," or "low" Accuracy, increases reliance on assessors' judgment. This introduces further uncertainties and loopholes to the standard and could dilute the sustainability requirements of the MSC Standard.</p> <p>It is therefore difficult to agree that the process of the ERF for assessors to consider information accuracy and adequacy will be effective in ensuring</p>

		rigorous and transparent assessment of the evidence used in fishery assessments. assessments. ;
<b>114934471709</b>	Non-governmental organisation	<i>Duplicate of 114935680642</i>
<b>114921832004</b>	Non-governmental organisation	The revised ERF provides a clearer process for assessors to evaluate accuracy and adequacy, which should help improve transparency. However, its effectiveness will depend on how consistently assessors apply expert judgment across different fisheries. Without stronger requirements for certain categories of evidence (e.g., independent verification, welfare-related data), there remains a risk of uneven rigor in assessments.
<b>114934041597</b>	Non-governmental organisation	Introduction of the consideration of information accuracy makes this less thorough and careful, and transparency is hindered by lack of guidance on definition of high, medium and low.
<b>114933972264</b>	Non-governmental organisation	<i>Duplicate of 114935680642</i>
<b>114931893479</b>	Non-governmental organisation	<p>The ERF has been significantly shortened under this proposal, after the methodology for evaluating Trueness and Precision has been removed. While this revision improves clarity and simplifies the ERF, ISSF is concerned that it may also weaken the ability of CABs to adequately assess available data. Some of ISSF’s specific concerns are addressed in responses to other questions within this survey. In addition, we would like to highlight other issues that do not fit elsewhere:</p> <ul style="list-style-type: none"> <li>• In section GB3.1.1 of the ERF several examples of information sources are listed, including “Electronic monitoring (e.g., cameras)”. ISSF recommends revising this to “Electronic monitoring (e.g., those using cameras)”, which is consistent with the terminology used in the Standard’s Guidance, and avoids confusion with camera systems that lack the other components of a full EMS. Similarly, the example “Sales accounting” is listed, while the term used in the Standard is “sales notes”. MSC should ensure consistent terminology is used across all tools and documents.</li> <li>• Definition of “fishing event”. In relation to the calculation of observer coverage rates, the current definition is too broad for certain fisheries, such as longline. For these fisheries, coverage should ideally be calculated based on the number of hooks, rather than fishing events or hauls, in order to adequately characterize their impacts (Polacheck, 1991). Therefore, ISSF suggests also including the reference to the number of hooks as a measure of effort to calculate the observer coverage in the Fisheries Standard Guidance (GSA3.11.3).</li> <li>• Regarding the second exception for RFMO high seas fisheries, the clause</li> </ul>

	<p>“Where there is a lower level of independent observation” (SA3.11.3.1.b), raises concern for ISSF, as it could be interpreted to mean that simply meeting RFMO requirements would be sufficient to meet SG80. In some cases, however, RFMO requirements are significantly below the 20% threshold required for other fisheries.</p> <ul style="list-style-type: none"> <li>• Variability in data collection. The table in the ERF guidance (section GB 3.1.3) provides example questions to guide consideration of how data collection methods account for variability. Some fisheries, however, have low observer coverage due to external factors such as shortage of trained human observers, or a lack of commitment from management bodies. These fisheries often rely on “any observers they can get”, without accounting for seasonal or other forms of variability. In such cases, assessors would be unable to answer the questions in the GB3.1.3 table. This suggests that a cap may be necessary (e.g., fisheries that do not account for variability —regardless of the reason — should not be able to achieve a score higher than SG80 when scoring information accuracy).</li> </ul>
<p><b>114899462711</b> Non-governmental organisation</p>	<p>First, all assessors are highly qualified and possess extensive experience. Second, the information collected during each surveillance is comprehensive and diverse. The descriptions and examples used to assess objectivity, relevance, completeness, and consistency are well structured.</p>
<p><b>114935339306</b> FIP provider</p>	<p>Shifting from 'degree of accuracy' to 'adequacy' is a welcome correction and a more equitable approach.</p> <p>Below are specific feedback/response related to the fishery type that we are currently involved in:</p> <p>Domestic sardine fishery, purse seine:  Agree. Our client's fleet self-record video on board, which has reliably captured bycatch/ETP. With an improved independent verification layer, we believe we can meet adequacy rigorously and cost-effectively. Third-party EM system doesn't fit domestic purse-seine realities in general.</p> <p>Rope grown oyster fishery:  All UoC vessels keep daily ETP logs that, together with expert review, indicate little to no negative impact on ETP species in the waters. Change from accuracy-based to adequacy-based consideration is a welcome change because it recognizes that well-kept self-reported logs plus independent verification can be</p>

rigorous and transparent, without mandating vendor EM for a fishery that realistically doesn't require it.

**“Overall, I support the proposed changes to the ERF.”**



Feedback received		
Respondent ID	Stakeholder Category	Comments
114935854975	Conformity assessment and/or accreditation body	We feel this is an improvement over the previous version; however, there is still concern about the time necessary to implement ERF for all information sources and the aforementioned issues of how to ensure it is consistently applied and interpreted.
114935220378	Conformity assessment and/or accreditation body	I fully agree and trust that MSC will put in place the much-needed training and calibration to support effective implementation of the ERF.
114926778971	Conformity assessment and/or accreditation body	I had personally chosen to apply the ERF as a guideline already. It was helpful as a tool to remind me to "tick the box" and cover all available sources of information systematically. The revision encourages a similar approach without being overly prescriptive in determining the final scoring issue score.
114905584606	Conformity assessment and/or accreditation body	I agree in the sense of any change that simplifies slightly the wording on the ERF is welcome but still think it is a challenging wording itself.
114935985271	Commercial wild-capture fisheries	114935985271 is supportive of the proposed changes to the ERF, and feels they are responsive to concerns raised regarding version 3.0. As noted above, we have concerns about how the objectivity of information will be evaluated by assessors.

<b>114935328811</b>	Commercial wild-capture fisheries	We agree with and support the comments of the Association of Sustainable Fisheries.
<b>114935030286</b>	Commercial wild-capture fisheries	Noting the ASF's earlier, supportive comments about the likelihood of much improved consistency, and our general confidence in assessors and the wider MSC process, we believe it is vital for the MSC to support implementation of the new ERF (and any other changes to the Standard) through enhanced training, in particular through assessor calibration workshops and follow-up evaluation of the application, to ensure the desired results are attained.
<b>114934899083</b>	Commercial wild-capture fisheries	Noting our support, it is important that this is followed up by sufficient testing to assure there are no devils in the details, as well as training for assessors and stakeholders.
<b>114930478442</b>	Commercial wild-capture fisheries	Is there a lack of trust in previous versions of the standard? If there has been an issue in an assessment, then it should be dealt with individually and not reflected for all fisheries.
<b>114930258485</b>	Commercial wild-capture fisheries	However, questions remain about the additional delays that will result from this tool.
<b>114936142847</b>	Non-governmental organisation	I do not agree with the exclusion, for the SI 3.2.3 (c) -SG60 and SG80- of the words "for the UoA". That will complicate a lot the procedure, by having to respond for boats and skippers out of the UoA
<b>114935742704</b>	Non-governmental organisation	We recommend re-incorporating the previously available Standard Toolbox, which provided more specific guidance for Assessors, and was developed over several years with extensive stakeholder input.
<b>114935713917</b>	Non-governmental organisation	We feel this change could lead to fisheries being certified too easily. For example, a fishery could be certified with no conditions, with only minimal quantitative information on bycatch and compliance with mitigation measures. This change may result in too much variability in how assessors assess individual fisheries. This change looks like it could allow for most fisheries to achieve a passing grade, because it is mostly based on qualitative and not quantitative information. This also creates a lack of incentive for fisheries to improve beyond SG80.
<b>114935698418</b>	Non-governmental organisation	The proposed changes to the ERF significantly weaken the outcomes of Standard Version 3, Principle 2. While it is important for CABs to feel as though they can exercise their best professional judgment, this has created significant inconsistencies between assessors. Further, the MSC has stated that in lieu of a more prescriptive ERF, "assessment teams are encouraged to consider the potential of the fishery to have a negative impact while scoring and can adjust

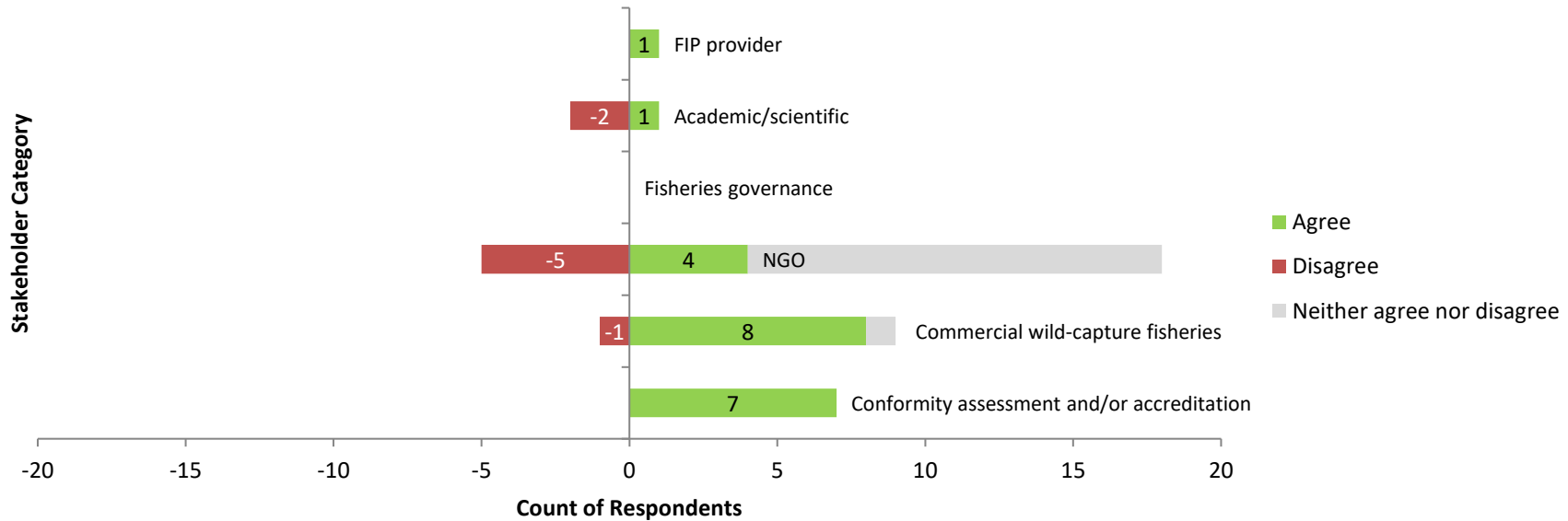
		<p>how much information is needed to estimate the impact of the fishery based on that consideration” (e.g., if the assessor determines that a fishery is at a low risk for impacts, the information requirements are less). Less prescriptive requirements, both for assessors, and within the ERF unintentionally reward fisheries who choose not to monitor and document impacts, or who lack adequate resources do so. Even in systems with sufficient resources, ascribing impact to a specific fishery or subset of fishery can be quite difficult. The starting point for considering impact of a fishery should be risk- For example, if a fishery occurs within the ETP species range, during a time and in an area where they might be, then there is the possibility it can interact with the gear. If that's the case, is the fishery using gear that is safe for the species, or gear that is modified to be safer and reduce potential for mortality or serious injury? If not, the fishery is adding risk and should be considered a threat to the species. In other words, the MSC should require that a CAB can determine, with strong scientific basis, that the fishery is not hindering recovery of an ETP species, and should provide clear and detailed methodology for how CABs may determine this using a precautionary, risk-based and data-driven approach.</p>
<b>114935680642</b>	Non-governmental organisation	<p>It would be difficult to agree that the proposed changes to the ERF will effectively ensure rigorous and transparent assessment of fishery evidence. The removal of the multi-step scoring system and explicit "degrees of accuracy" from guideposts, while simplifying the assessment process, are not improving its clarity. We fear that the new “Consideration of information accuracy” can be interpreted very differently between specific assessors, leading to inconsistency between assessments. The absence of any scoring guidelines – e.g. rankings for "high," "medium," or "low" accuracy -, combined with more room for assessors' judgment when scoring, will introduce uncertainties and loopholes to the standard. Data demands are also weakened at SG60, allowing for merely "broadly understand[ing]" impacts, potentially with simple qualitative data. Thus, some of the changes are expected to diminish consistency, rigour, and transparency in practice.</p>
<b>114935583787</b>	Non-governmental organisation	<i>Duplicate of 114935680642</i>
<b>114935537358</b>	Non-governmental organisation	<i>Duplicate of 114935680642</i>
<b>114935463463</b>	Non-governmental organisation	Stronger safeguards are needed. 114935463463 recommends: (1) reinstating precision thresholds linked to minimum coverage; (2) explicit rules for evaluating trueness, including representativeness in space and time and integrity of AIS data; and (3) transparent application of the observer coverage tool, with

		justification for the choice of “fishing days” as the unit of effort. Without these minimum criteria, outcomes remain overly dependent on assessor discretion and cannot ensure consistent, rigorous, and transparent assessments.
<b>114935402174</b>	Non-governmental organisation	Eliminating the step-by-step process only contributes to greater uncertainty and lack of transparency in a process that should be addressed in detail. Furthermore, the lack of scoring detail simply leaves room for assessor bias rather than providing a more impartial view of the system being evaluated.
<b>114935201693</b>	Non-governmental organisation	The proposed changes to the ERF, which remove many of the explicit metrics that must be achieved to meet scoring guideposts and replace them with a set of suggested questions that “may” guide consideration (GB3.1.2.a), leaves the ultimate evaluation of adequacy (and therefore scoring for many Scoring Elements) up to the subjective “expert judgement” of the CABs, with no clear path for a stakeholder to successfully challenge that judgement in an objection process. These changes would just heighten the issues that the ERF was meant to address.
<b>114935167081</b>	Non-governmental organisation	<i>Duplicate of 114935680642</i>
<b>114935145363</b>	Non-governmental organisation	<i>Duplicate of 114935680642</i>
<b>114935002422</b>	Non-governmental organisation	Building on trust and reliability on data is important if we are to increase better assessment tools.
<b>114934996080</b>	Non-governmental organisation	Overall, we disagree that proposed changes to the ERF will be able to ensure a more rigorous and transparent assessment of fishery evidence. The removal of the multi-step scoring system and explicit “degrees of accuracy” from guideposts, while simplifying the assessment process, are not improving its clarity. We fear that the new “Consideration of information accuracy” can be interpreted very differently between specific assessors, leading to inconsistency between assessments. The absence of any scoring guidelines – e.g. rankings for “high,” “medium,” or “low” accuracy -, combined with more room for assessors’ judgment when scoring, will introduce uncertainties and loopholes to the standard. Data demands are also weakened at SG60, allowing for merely “broadly understand[ing]” impacts, potentially with simple qualitative data. Thus, some of the changes are expected to diminish consistency, rigour, and transparency in practice.

<b>114934471709</b>	Non-governmental organisation	It is difficult to agree that these proposed changes will effectively ensure rigorous and transparent assessment of fishery evidence. The removal of the multi-step scoring system and explicit "degrees of accuracy" from guideposts, while simplifying the assessment process, is not seen as improving its clarity. Instead, the new "Consideration of information accuracy" can be interpreted very differently between specific assessors, leading to inconsistency between assessments. This issue is compounded by the absence of any scoring guidelines, such as rankings for "high," "medium," or "low" accuracy, combined with more room for assessors' judgment when scoring, and will introduce uncertainties and loopholes to the standard. Furthermore, data demands are weakened at SG60, allowing for merely "broadly understand[ing]" impacts, potentially with simple qualitative data. Consequently, some of the changes are expected to diminish consistency, rigour, and transparency in practice.
<b>114921832004</b>	Non-governmental organisation	The revisions represent a step forward in clarity and usability, but I remain neutral overall because they do not address important gaps such as the absence of welfare-related indicators or stronger safeguards on evidence quality. Addressing these would improve both rigor and alignment with broader stakeholder expectations.
<b>114934041597</b>	Non-governmental organisation	The changes seem to make the assessment process more subjective and less clear.
<b>114933972264</b>	Non-governmental organisation	<i>Duplicate of 114935680642</i>
<b>114931893479</b>	Non-governmental organisation	ISSF agrees with the proposal for a new, simplified ERF, but believes some items require some adjustments before we can fully support the proposal, as described in our responses to other questions in this survey.
<b>114935727997</b>	Academic/scientific professional	<ul style="list-style-type: none"> <li>- For ETP OOS fishing information, fishing events should be selected upon careful considerations, based on prior knowledge of the fishery (season, area, gear, etc.) and the ecology of the fishing area.</li> <li>- Change from 30% to 20% coverage is extremely low, when considering that: i. high seas fisheries large-scale industrialized, ii. Fisheries taking place in especially sensitive area, where management is in many cases currently lacking. iii. Evidence to suggest that absence of enforcement and control with unregulated fishing activity taking place in remote MPAs areas in the high seas. 30% coverage should be reinstated, and for larger -scale industrial fisheries larger coverage should be targeted.</li> <li>- Evidence should also be available for fishing effort indices, not solely catch.</li> </ul>

	<p>Such information is crucial to have as it enables determining hotspots of fishing activity and potential overlap of fisheries with sensitive area and ETP species. To that end, other than a sound catch collection framework, fishing effort is also important to assess, with the use of AIS or other positioning systems that are easy to implement for larger size vessels. For smaller size vessels such information is crucial, as i. catch information is usually aggregated, following fishing operation, and ii. monitoring usually take place during gear deployment or collection but is not linked to actual soaking time of nets.</p>
<p><b>114932668760</b></p>	<p>Academic/scientific professional</p> <p>It will increase the time for assessment and writing what will significantly increase the price</p>

The term 'estimate' is used at the SG80 (best-practice) level. Please state whether you agree or disagree with the following statement: "I support the use of the updated definition of 'estimate'."



Feedback received		
Respondent ID	Stakeholder Category	Comments
114935854975	Conformity assessment and/or accreditation body	This definition is both clear and non-prescriptive enough to assess without ambiguity.
114935220378	Conformity assessment and/or accreditation body	The new definition is clear and follows what many assessors would have already been applying under v2.01. I therefore don't think it is a significant change from the current standard, but it is a significant improvement from v.3 which lacked clarity on interpretation and intent.
114905584606	Conformity assessment and/or accreditation body	It is a bit more specific but still opened to what each assessor considers "some" and "approximation"
114935985271	Commercial wild-capture fisheries	114935985271 agrees with ASF's feedback that in combination with the changes to the ERF that sit alongside changes to the specific scoring requirements, the change to the 'estimate' definition is beneficial. Our

		expectation is that this will support a more consistent application of the Standard between fisheries and assessors.
<b>114934071628</b>	Commercial wild-capture fisheries	I am not sure if this can be applied to coastal, data limited fisheries. Example of application and testings are necessary to answer this question. I thought qualitative information can also estimate, but is it not?
<b>114935328811</b>	Commercial wild-capture fisheries	We agree with and support the comments of the Association of Sustainable Fisheries.
<b>114935030286</b>	Commercial wild-capture fisheries	In combination with the changes to the ERF that sit alongside changes to the specific scoring requirements, the ASF is content with the change to the 'estimate' definition. Again, our expectation is that this will support a more consistent application of the Standard between fisheries and assessors.
<b>114930478442</b>	Commercial wild-capture fisheries	Unclear. The conformity between "estimate" and "conditional pass" is unclear.
<b>114935742704</b>	Non-governmental organisation	While we agree that the consideration of quantitative information is important for scoring, we are concerned that no guidance on what type of quantitative information meets the threshold for scoring is provided. Moreover, if Assessors are required to develop a numeric approximation based on minimal quantitative data, errors in the estimate are more likely to be made. In this case, an Assessor's opinion or judgement of the situation (e.g., there is not enough quantitative information available to make a reliable estimate) may lead to a more reliable assessment.
<b>114935713917</b>	Non-governmental organisation	The change appears to reduce the demand of a quantitative approximation, which could lead to less numerical representation of the situation
<b>114935680642</b>	Non-governmental organisation	<p>While the clarification provided by the new definition of "estimate" - compared to the previous definition –might be positive, there remain problematic uncertainties around this new definition and the shift in location for Scoring Guidepost of prescriptive monitoring thresholds.</p> <p>The redefinition of "estimate" as "to make a numeric approximation based on at least some quantitative data" is problematic, as the phrase "at least some" is too vague and offers little incentive for fisheries to improve monitoring coverage beyond SG80.</p> <p>Under those changes, fisheries can be certified without conditions even with very low-coverage – if not nearly absent - and substandard monitoring of catch data, provided there is some form of independent "verification". This weakens data requirements by largely replacing the more robust "independent observation"</p>

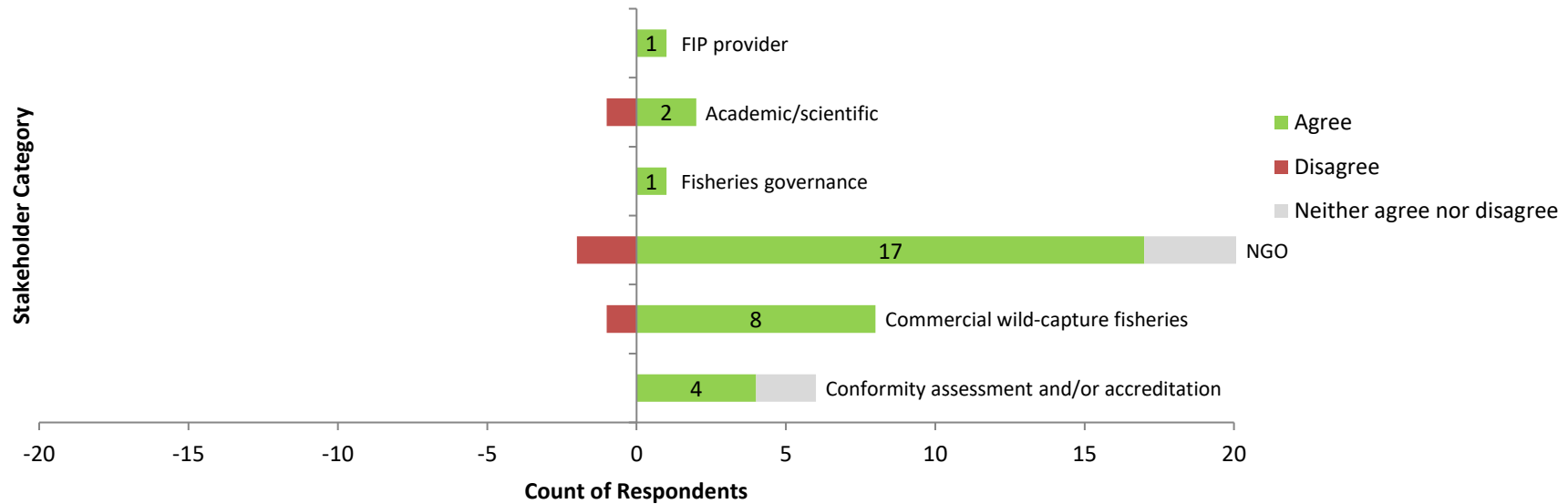
	<p>with the weaker "independent verification", which can include less rigorous methods like shore-based checks instead of in-situ observation. These changes create no incentive for fisheries to increase their monitoring coverage and transparency and, combined with the removal of "degrees of accuracy", lead to increased reliance on "expert judgment," fostering risks of inconsistency between assessments and contributing to a weakened Standard in sustainability requirements.</p>
<p><b>114935698418</b> Non-governmental organisation</p>	<p>On at least some quantitative data” is too broad. A more appropriate definition of “estimate” as it pertains to an SG80 guidepost (which in theory reflects best practice) should specify that (1) the level of quantitative evidence available is sufficient to make accurate generalizations regarding the fishery (for example, cover a time period of at least several years/fishing seasons), and (2) the data used has been collected in a clear and transparent manner so that the accuracy and completeness of the information is not in doubt. If any information has been excluded from analysis or decision-making, the rationale for this decision should also be clear and transparent.</p> <p>Requirements for quantitative data at lower SGs should be strengthened from “broadly understanding” impact to ensure a robust understanding of impacts, and structured guidance on a clear scoring system to mitigate the risk of inconsistency between CABs should be reintroduced.</p>
<p><b>114935583787</b> Non-governmental organisation</p>	<p>Although the new definition of "estimate" is more clear than the previous one, there are still uncertainties around this new definition and the shift in location for the Scoring Guidepost of prescriptive monitoring thresholds.</p> <p>The redefinition of "estimate" as "to make a numeric approximation based on at least some quantitative data" is problematic because the phrase "at least some" is too vague. This definition offers little incentive for fisheries to improve monitoring coverage beyond SG80.</p> <p>Under these changes, fisheries can be certified with no conditions, even with substandard and nearly absent monitoring of catch data, as long as there is some form of independent "verification." This weakens data requirements by replacing the robust "independent observation" with the weaker "independent verification," which can include less rigorous methods, such as shore-based</p>

		checks instead of in situ observation. These changes create no incentive for fisheries to increase their monitoring coverage and transparency. Combined with the removal of "degrees of accuracy," they lead to increased reliance on "expert judgment," which fosters inconsistency between assessments and contributes to a weakened sustainability requirement Standard.
<b>114935402174</b>	Non-governmental organisation	Redefining "estimate" and removing accuracy requirements risks weakening monitoring by allowing vague interpretations, reducing data standards, and relying on weaker verification, undermining both consistency and rigor in the MSC sustainability standard.
<b>114935537358</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114935463463</b>	Non-governmental organisation	114935463463 does not consider this a step forward. In ERF v1.1, assessors had to evaluate accuracy systematically through explicit trueness and precision guideposts, with minimum requirements even at SG60 (e.g., a functioning catch monitoring system with independent verification, and ≥30% observer coverage for high-seas ETP/OOS species). The new proposal replaces this structured approach with a vague definition of "estimate" as a numeric approximation based on some quantitative data. This weakens the entry bar at SG60, where there is now no requirement for an actual monitoring system. At SG80, the bar is also lowered—from "high degree of accuracy" to merely "adequate to estimate." This shifting replaces measurable accuracy with subjective assessor judgement. Overall, 114935463463 cannot support the removal of explicit accuracy benchmarks in favour of this weaker and more ambiguous approach.
<b>114935167081</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114935145363</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114934996080</b>	Non-governmental organisation	<p>The new definition of "estimate" as "to make a numeric approximation based on at least some quantitative data" is problematic, as the phrase "at least some" is too vague and offers little incentive for fisheries to improve monitoring coverage beyond SG80.</p> <p>A fishery would be able to be certified without conditions even with very low-coverage and with substandard monitoring of catch data, provided there is some form of independent "verification" which can include less rigorous methods like shore-based checks instead of in-situ observation. This weakens data requirements as it replaces the more robust "independent observation" with the weaker "independent verification" previously required at SG60.</p>

		These changes create no incentive for fisheries to increase their monitoring coverage and transparency that could contribute to weakening of the Standard's sustainability requirements.
<b>114934471709</b>	Non-governmental organisation	It is difficult to agree that these proposed changes will effectively ensure rigorous and transparent assessment of fishery evidence, particularly concerning monitoring and data accuracy. The redefinition of "estimate" as "to make a numeric approximation based on at least some quantitative data" is problematic due to the vagueness of "at least some," which offers little incentive for fisheries to improve monitoring coverage beyond SG80. This means fisheries could be certified without conditions even with very low-coverage or substandard monitoring of catch data, provided there is some form of independent "verification," a notably weaker requirement compared to the previously more robust "independent observation". This shift weakens data requirements and creates no incentive for increased monitoring coverage and transparency. This increased subjectivity, coupled with reportedly weakened data demands at SG60, where merely "broadly understand[ing]" impacts with simple qualitative data may suffice, is expected to introduce uncertainties and loopholes to the standard.
<b>114921832004</b>	Non-governmental organisation	The updated definition improves clarity, but it should also encourage inclusion of welfare-relevant data. For example, catch reporting systems could record indicators of poor handling (e.g., rough discarding, prolonged air exposure) or injury rates in released species, particularly for ETP/OOS species. Such metrics would support more rigorous assessments and highlight fishers who are exceeding current requirements.
<b>114934041597</b>	Non-governmental organisation	Improved clarity on the use of estimate requiring quantitative information is beneficial. However, the relatively low bar of "at least some" leaves the potential for fisheries to obtain certification with very little information.
<b>114933972264</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114931893479</b>	Non-governmental organisation	ISSF agrees with the statement, but considers it should also apply to SG60 (see our responses under the "Changes to prescriptive catch monitoring thresholds" section).
<b>114925202249</b>	Non-governmental organisation	The clarity of language is a step forward, but the definitions of should encourage the inclusion of welfare-relevant data. For example, the catch reporting system can help detect poor handling practices such as rough discarding or prolonged

		air exposure, it can require data on injury rates in released species, especially for ETP/OOS species. Such metrics can help highlight outstanding fishers who are going above and beyond current requirements.
<b>114900517337</b>	Academic/scientific professional	word of Estimate is used 93 time in the toolbox, it is not quantitative assessing definition but certain to DLF.
<b>114935339306</b>	FIP provider	More or less agree because 'estimate' now has a explicit definition. Unsure how much hinges on assessor judgement.

**“It is feasible for certified fisheries to have information that is adequate to estimate the impact of the fishery - either to pass certification without conditions, or to meet this requirement within five years if certified with conditions.”**



Feedback received		
Respondent ID	Stakeholder Category	Comments
114935854975	Conformity assessment and/or accreditation	Certified fisheries should be able to meet this threshold.
114926520123	Conformity assessment and/or accreditation	Agree for some fisheries, but I'm not sure about feasibility for fisheries that require use of the RBF.
114926778971	Conformity assessment and/or accreditation	Adequacy is linked to Accuracy - should the question not therefore be "information that is adequate to accurately estimate the impact of the fishery" Is GB4 of the ERF missing - or is it deliberately left to assessors to determine if information is "collectively adequate"?
114905584606	Conformity assessment and/or accreditation	This question is very generic, of course the information available for some certified fisheries is feasible to pass, but that is very specific for each fishery, depending on the gear, the data provided,...

<b>114935985271</b>	Commercial wild-capture fisheries	<p>We generally agree with this statement but note our concerns around data objectivity where fishing participants / industry are collaborating with researchers to collect information regarding fishery impact. Our expectation is that collaborative research partnerships will not be viewed as a conflict of interest as assessors evaluate objectivity of information, especially when government research funding is limited and industry partnerships are helping fill the gap.</p> <p>Additionally, feasibility for certified fisheries to have adequate information on fishery impacts will be contingent on application of the new language, and whether assessors will consider ad-hoc or periodic data collection efforts, rather than a consistent monitoring or data collection program, sufficient to meet the requirements for estimating compliance. Small boat fisheries in Alaska that have limited monitoring but also limited data demonstrating significant impacts to ETP species and/or habitats may face challenges here, but specific impacts are unclear until we get more information on testing and use of the updated process for assessors.</p>
<b>114935328811</b>	Commercial wild-capture fisheries	We agree with and support the comments of the Association of Sustainable Fisheries.
<b>114935030286</b>	Commercial wild-capture fisheries	In determining adequacy of information, consideration of the risk posed is vitally important. However, we believe this is now well-addressed by the allowance within B4 (determination of information adequacy), and in particular in B4.1.4.a and B4.1.4.b. As such, we consider the change appropriate.
<b>114930478442</b>	Commercial wild-capture fisheries	For pass without conditions, it would be a recommendation to collect sufficient data, whereas for a conditional pass, it would be a condition to collect sufficient data within 5 years in order to stay certified. These are very different situations presented even if they're both being asked for the same thing.
<b>114936142847</b>	Non-governmental organisation	I agree in general, but for some long life span OOS species it is very difficult (for example, dolphins, or migratory seabirds), so maybe more time should be necessary to have more time to have STATUS, but the research can be initiated and proved to be serious.
<b>114935742704</b>	Non-governmental organisation	For ETP species: We agree with this statement, but are concerned as the proposed changes make it too easy for a fishery to be certified. For example, it is hard to see a situation where a fishery is not able to meet the minimum scoring threshold of SG60 for PI 2.2.3a for marine mammal bycatch, as only information that are "adequate to broadly understand" impact would be required, and the

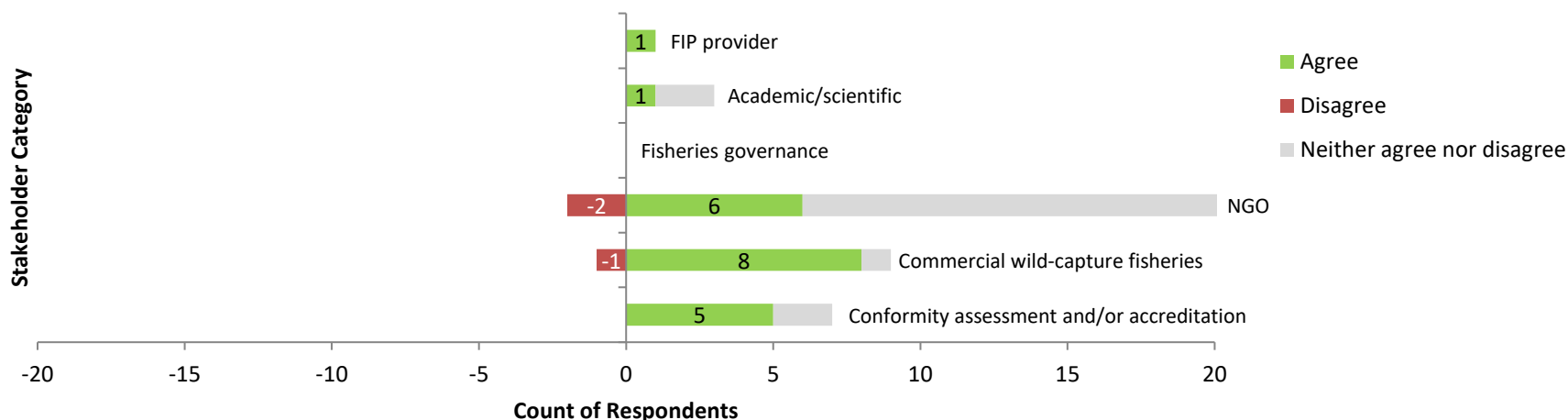
		information could largely be qualitative. Even the threshold for SG80 only requires minimal qualitative information to be available.
<b>114935713917</b>	Non-governmental organisation	This could allow a fishery to be certified without condition too easily because assessors only need to show that information is adequate to broadly understand the impact.
<b>114935680642</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114935583787</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114935402174</b>	Non-governmental organisation	Estimating impacts on Endangered Threatened Protected or Out of Scope species requires robust independent monitoring, structured data, compliance tracking, and transparent reporting. Fisheries unable to meet these standards should not qualify for MSC certification without improvement measures like fisheries improvement program
<b>114935537358</b>	Non-governmental organisation	<p>Under the new definition of “estimates” and shift in scoring guideposts proposed by the new changes, it seems highly unlikely that a fishery would be unable “to have information that is adequate to estimate the impact of the fishery”. This is not a testimony to global fisheries good practices and governance but rather is a major concern due to a perceived weakening of the standard.</p> <p>To estimate its impact - notably for ETP/OOS species - a fishery would require minimum standards in terms of independent monitoring coverage (e.g. &gt;20% via human observers and/or REM), structured data collection, compliance information and transparent reporting. If a fishery is unable to meet those standards, it is poorly managed and by definition shouldn't be eligible to the MSC certification and have access to its market benefits, without prior adjustments (e.g. Improvement Program, FIP, etc.). This is particularly true in the current context of rapidly evolving monitoring technologies, which make REM solutions more efficient and accessible, including for smaller scale fisheries.</p> <p>If the MSC “Good Practice” (SG80) is “to have information that is adequate to estimate the impact of the fishery” one could question the very reason of the MSC certification, if basic standards of transparency and data collection - which are the foundation of sustainable fisheries – are so easily reachable and temporary “optional” (e.g. can be certified via Condition). The 5 years window provided by a Condition to improve to proper monitoring and reporting measures is certainly more than enough for the vast majority of fisheries involved with the MSC standard. Fisheries that cannot - or more likely are “unwilling” to implement</p>

		those measures - shouldn't be rewarded via a sustainability label in the first place. If the MSC ambitions to be the "gold standard" for fisheries and seafood sustainability, it should uplift fisheries to better standard and practices, not align itself to poor practices and governance.
<b>114935463463</b>	Non-governmental organisation	114935463463 disagrees, particularly for ETP/OOS species and habitat impacts. Under ERF v1.1, even SG60 required a minimum monitoring system with independent verification, and high-seas fisheries were expected to reach ≥30% observer coverage for ETP/OOS species. The new proposal removes these safeguards, leaving SG60 as only a subjective adequacy judgement. This makes "feasibility" meaningless, as fisheries can continue without credible monitoring. In practice, many certified fisheries have shown little progress in closing information gaps over successive certification cycles. For feasibility to be genuine, the Standard must retain explicit minimum requirements for observer or electronic monitoring coverage, validated species identification, and spatially representative habitat interaction monitoring for SG 80, together with clear timelines to close gaps within one certification cycle.
<b>114935201693</b>	Non-governmental organisation	There are many sources of quantitative data that can be collected with relatively low cost and/or capacity needs, including log books and catch reports, landing reports, and dock side inspections. Implementing one or more of these things should be feasible for all fisheries.
<b>114935167081</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114935145363</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114934996080</b>	Non-governmental organisation	<p>It would seem highly unlikely that a fishery would be unable "to have information that is adequate to estimate the impact of the fishery" which is a major concern due to a perceived weakening of the standard and counter to MSC setting a "gold standard".</p> <p>To estimate a fisheries impact for ETP/OOS species a minimum level of independent monitoring coverage would be required, either through human observers and/or REM, structured data collection, compliance information and transparent reporting. If a fishery is unable or unwilling to meet those standards, it is poorly managed and by definition shouldn't be eligible to the MSC certification, without prior adjustments (e.g. Improvement Program, FIP, etc.).</p> <p>If the MSC "Good Practice" (SG80) is "to have information that is adequate to</p>

	<p>estimate the impact of the fishery” the very reason of the MSC certification can be questioned if basic standards of transparency and data collection are so easily reachable and temporary “optional” as they could be certified via Condition. If after the 5 years window, provided by a Condition to improve to proper monitoring and reporting measures, a fishery has not implemented those it should not be rewarded via a sustainability label. The MSC should aim to uplift fisheries to improved standard and practices, not align itself to poor practices and governance.</p>
<p><b>114934471709</b> Non-governmental organisation</p>	<p>The proposed changes to the MSC standard, specifically the new definition of “estimates” and the revised scoring guideposts risk making it unduly straightforward for a fishery to demonstrate it possesses “information that is adequate to estimate the impact of the fishery”, which does not necessarily reflect genuine good practices or governance within global fisheries.</p> <p>To genuinely estimate its impact, particularly concerning Endangered, Threatened, and Protected (ETP) or Out-of-Scope (OOS) species, a fishery should adhere to minimum standards. These include independent monitoring coverage, ideally exceeding 30% through human observers or Remote Electronic Monitoring (REM), coupled with structured data collection, robust compliance information, and transparent reporting. Fisheries failing to meet these fundamental requirements are considered poorly managed and should, by definition, be ineligible for MSC certification and its associated market benefits without prerequisite improvements, such as participation in a Fishery Improvement Project (FIP). The increasing efficiency and accessibility of REM technologies, even for smaller-scale operations, further underscores the feasibility of implementing such monitoring measures.</p> <p>The current approach, which potentially allows basic standards of transparency and data collection – foundational to sustainable fisheries – to be considered “optional” or satisfied through a Condition, undermines the very purpose of MSC certification. While a 5-year window for improvement via a Condition is generally sufficient for most fisheries, those unwilling or consistently unable to implement proper monitoring and reporting should not be granted a sustainability label. If the MSC aspires to be the “gold standard” for fisheries and seafood sustainability, its role should be to elevate fisheries to superior standards and practices, rather than accommodating poorer practices and governance.</p>

<b>114921832004</b>	Non-governmental organisation	In many cases it is feasible for fisheries to collect adequate quantitative data within five years, but feasibility varies significantly across contexts. Data on habitats and ETP/OOS species often remain sparse, particularly in small-scale or data-limited fisheries. Without clearer expectations for independent verification and inclusion of welfare-relevant metrics (e.g., survival or injury rates of released species), assessments risk inconsistency and may overlook key impacts.
<b>114934041597</b>	Non-governmental organisation	Collection of information associated with good fishery governance should be a bare minimum of fisheries undergoing certification, especially given the five year window afforded where conditions are introduced.
<b>114933972264</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114899462711</b>	Non-governmental organisation	For a fishery managed under a RFMO, achieving SG80 for PI 2.2.3(A) could be difficult. Even though we have 100% observer coverage onboard, they need to do multiple tasks. Recording species caught after a haul is feasible, but recording bird-strikes during towing is a highly demanding activity. Current observation rates of bird-strikes are at ~5%.
<b>114935727997</b>	Academic/scientific professional	Five years is too long a time for certain ETP/OOS and in-scope unwanted catch species. It is important for certified fisheries to have concrete plans and measures in place for mitigating and where possible eliminating impacts on species. Not making that clear in the scoring, by mentioning vague "estimates" and no concrete goals, conditions and measures in place can be detrimental for impacted species.
<b>114935339306</b>	FIP provider	Provisionally agree: feasible provided the program recognizes operator-reported records plus independent verification.

“The proposed changes simplify the scoring guidepost language, as compared to the language used in the same scoring guideposts in the Fisheries Standard v3.1.”

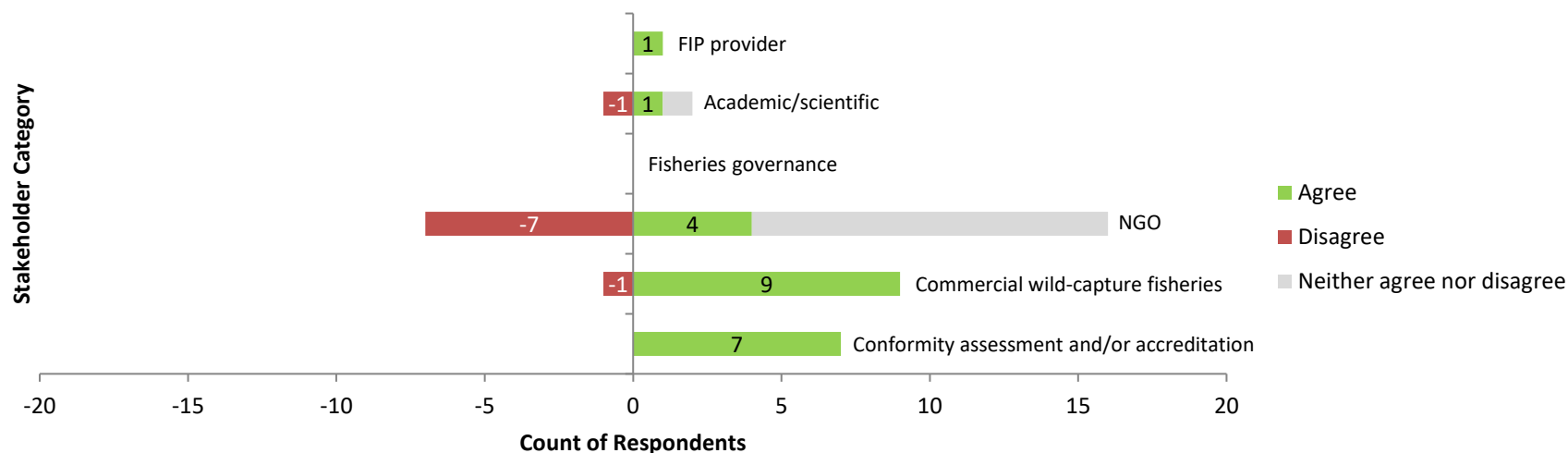


Feedback received		
Respondent ID	Stakeholder Category	Comments
114935854975	Conformity assessment and/or accreditation body	Wording is simplified and direct.
114935328811	Commercial wild-capture fisheries	We agree with and support the comments of the Association of Sustainable Fisheries.
114935030286	Commercial wild-capture fisheries	We support the change to the language, and consider that it does simplify the requirement in comparison to v.3.1.
114930478442	Commercial wild-capture fisheries	Unclear how I should be interpreting the clauses.
114936142847	Non-governmental organisation	In general I agree. My only disagreement is regarding the 3.2.3 (c) which I consider the changes make more vague.
114935742704	Non-governmental organisation	The proposed changes appear to take a step backwards in clarity, and allow more room for differing interpretations by Assessors and inconsistency in the application of the Standard.
114935680642	Non-governmental organisation	The clearer definition of “estimate” does indeed simplify the language; although we question the criteria “based on at least some quantitative data” which we find too vague and prone to further loopholes within the Standard. We also

		<p>consider that using the term “estimate” only at SG80 is dramatically backward from the promises of the MSC v3.1 Standard revision process. Having “a numeric approximation based on at least some quantitative data” to assess a fishery’s impact considered “Good Practice” (SG80) rather than being a minimum Standard (SG60), is concerning. If implemented it will reflect very poorly on the perception of stakeholders and consumers on the certification as being the international “gold standard”, and of MSC ambitions overall.</p>
<b>114935698418</b>	Non-governmental organisation	<p>Noting that simplification in this sense does not equate to improvement, nor ensuring that certified fisheries are meeting environmental best practice.</p>
<b>114935583787</b>	Non-governmental organisation	<p>Although the clearer definition of "estimate" simplifies the language, the criterion "based on at least some quantitative data" is questionable as it is too vague and prone to loopholes within the standard. Using the term "estimate" only at SG80 dramatically contradicts the promises of the MSC v3.1 Standard revision process.</p> <p>Considering "a numeric approximation based on at least some quantitative data" to assess a fishery's impact as "good practice" (SG80) rather than a minimum standard (SG60) is concerning. If implemented, it will negatively impact stakeholders' and consumers' perception of the certification as the international "gold standard" and MSC's ambitions overall.</p>
<b>114935402174</b>	Non-governmental organisation	<p>Although the clearer definition of “estimate” improves clarity, its vague criteria and placement only at SG80 instead of as a minimum standard (SG60) could create gaps, undermining stakeholder confidence and the MSC’s procedure.</p>
<b>114935537358</b>	Non-governmental organisation	<p>Duplicate of 114935680642</p>
<b>114935463463</b>	Non-governmental organisation	<p>The wording may be shorter, but simplification is not achieved. In v3.1 and ERF v1.1, the scoring guideposts were tied to explicit trueness and precision benchmarks, which provided a structured basis for assessing adequacy. The new proposal removes these benchmarks and replaces them with vague terms such as “adequate to estimate”. This creates more ambiguity and expands the room for interpretation by CABs. Rather than simplifying, the proposals reduce clarity and predictability while weakening the minimum requirements at SG60 and SG80.</p>
<b>114935167081</b>	Non-governmental organisation	<p>Duplicate of 114935680642</p>

<b>114935145363</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114934996080</b>	Non-governmental organisation	<p>While the clearer definition of “estimate” does simplify the language, the criteria “based on at least some quantitative data” is concerning as it too vague and prone to further loopholes within the Standard. Moreover, using the term “estimate” at SG80 is dramatically backward from the promises of the MSC v3.1 Standard revision process.</p> <p>The shift in guideposts from a minimum pass (SG60) to “Good Practice” (SG80) of having “a numeric approximation based on at least some quantitative data” to assess a fishery’s impact is worrying. If implemented it will reflect very poorly on the perception of stakeholders and consumers on the value of the MSC certification and it being the international “gold standard”.</p>
<b>114934471709</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114934041597</b>	Non-governmental organisation	The requirement of at least some quantitative data is clearer.
<b>114933972264</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114935339306</b>	FIP provider	Basing it on whether information is adequate to estimate is simpler than degree of accuracy.

“Noting that accuracy is considered by assessors within the ERF, I support the removal of degrees of accuracy from the scoring guidepost language.”



Feedback received		
Respondent ID	Stakeholder Category	Comments
114935854975	Conformity assessment and/or accreditation body	The use of 'broad understanding,' 'adequate estimate,' and 'adequate estimate with certainty' is much clearer than the previous degrees of accuracy.
114935220378	Conformity assessment and/or accreditation body	As per my comments during an earlier pilot testing phase, the 'accuracy' statements in the previous version's SGs was incredibly confusing. So I fully support their removal and to instead have the requirement to consider accuracy through the ERF.
114926778971	Conformity assessment and/or accreditation body	It is helpful to no longer need to explicitly meet TG2 and PG2 or TG3 and PG3 (where relevant) to achieve an 80 or 100 score.  It may be helpful to assessors but to fishery clients who rarely look anywhere other than the PI scoring tables this may not be helpful.
114905584606	Conformity assessment and/or accreditation body	Still confusing wording overall within the ERF

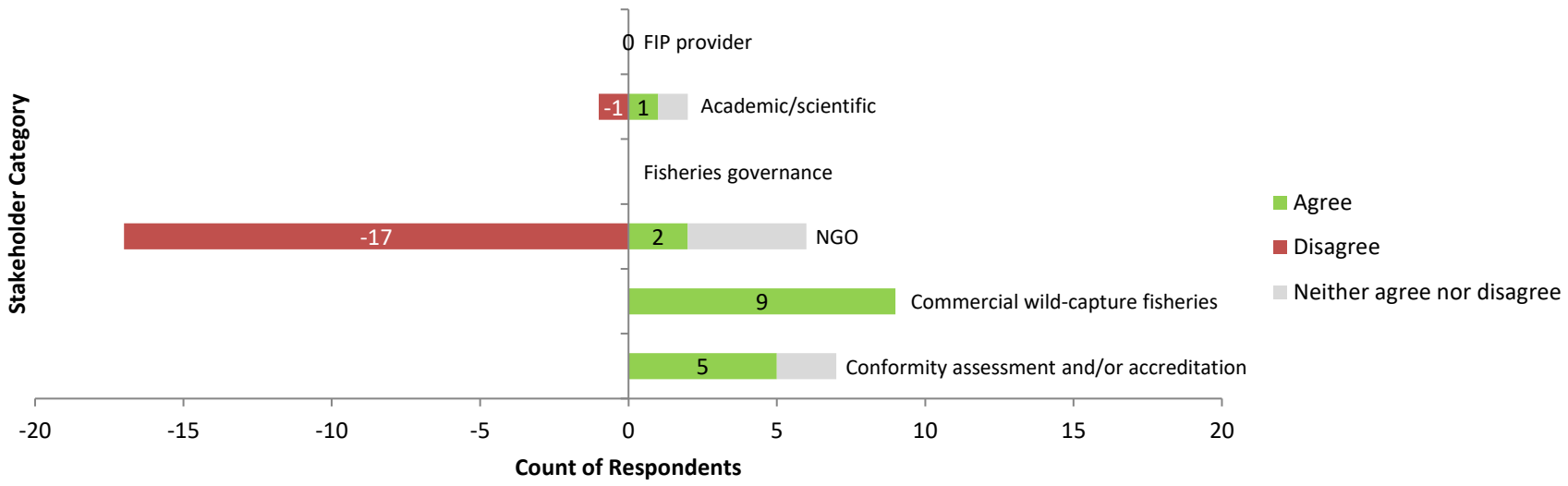
<b>114935985271</b>	Commercial wild-capture fisheries	114935985271 believes that assessors are in the best position to determine scores based on available information. Overly prescriptive language in the ERF would limit the ability of assessors to use their expert judgment and account for or respond to unique characteristics of the fishery under assessment. We support changes, like the removal of degrees of accuracy from the scoring guidepost language, that prioritize a specific process outcome (i.e. the assessors evaluate the accuracy of information sources and use that information to inform scoring) while allowing assessors to use their expert judgment.
<b>114935328811</b>	Commercial wild-capture fisheries	We agree with and support the comments of the Association of Sustainable Fisheries.
<b>114935030286</b>	Commercial wild-capture fisheries	Again, we support this change – we believe the caveats to scoring (e.g., in SA3.8.3 for PI 2.1.3, and SA3.11.2-3.11.3 for PI 2.2.3) and requirement under the new ERF to document the reasoning more fully within the rationale removes the need to refer to degrees of accuracy within the SGs. We also support the change at SG100 from a ‘very high degree of accuracy’ to ‘a high degree of certainty’, which better reflects that it is the assessors’ role to determine the score based on the information available and the risk posed by the fishery to the component.
<b>114930478442</b>	Commercial wild-capture fisheries	As I mentioned earlier, it is unclear where the line is drawn and worried that this may allow too much space for assessors to interpret and score the same thing differently.
<b>114930258485</b>	Commercial wild-capture fisheries	We will need to estimate the additional time required for this new way of working. These delays will have an impact on certified fisheries or those in the process of certification.
<b>114935742704</b>	Non-governmental organisation	We strongly disagree with this proposal and see it as a step back. Removal of different degrees of accuracy mean that the new "consideration of information accuracy" can be interpreted differently between different Assessors. This will undermine the validity of the MSC Standard in the long-term.
<b>114935713917</b>	Non-governmental organisation	We consider this a step backwards from V3.1 and may allow for too much variability between assessors and fisheries being certified without conditions, when conditions should be attached to the certification.
<b>114935680642</b>	Non-governmental organisation	The removal of structured guidance and explicit degrees of accuracy leads to risks of inconsistency between assessments because the "Consideration of information accuracy" can be interpreted very differently between specific assessors and CAB". There is clear no indication – or rankings – of what type of information could be considered as “high”, “medium” or “low” Accuracy. This increased reliance on

		<p>expert (assessors) judgment introduces uncertainties and loopholes to the standard, which undermines the Standard overall.</p> <p>While some of those changes can enhance clarity and simplicity for evaluations, considering the issues with the prior “degrees of accuracy” definition, we are not convinced that the proposed changes – in their current forms – are ultimately an improvement.</p>
<b>114935698418</b>	Non-governmental organisation	The MSC has stated that the ERF is intended to “inform, rather than prescribe” scoring. Therefore, the inclusion of degrees of accuracy within the ERF is insufficient to ensure that assessors have thoroughly considered this topic when making decisions on scoring guideposts. It should be explicit in the standard, and assessors should justify their decision-making in the certification report. Structured guidance on a clear scoring system to mitigate the risk of inconsistency between CABs should be reintroduced.
<b>114935583787</b>	Non-governmental organisation	<p>Removing structured guidance and explicit degrees of accuracy increases the risk of inconsistency between assessments because the "consideration of information accuracy" can be interpreted differently by specific assessors and the CAB. There is no clear indication or ranking of what type of information could be considered "high," "medium," or "low" accuracy. Increased reliance on expert judgment introduces uncertainties and loopholes to the standard, undermining it overall.</p> <p>While some of these changes could enhance clarity and simplicity in evaluations, given the issues with the previous "degrees of accuracy" definition, I am not convinced that the proposed changes, in their current form, are ultimately an improvement.</p>
<b>114935402174</b>	Non-governmental organisation	Removing structured guidance and explicit accuracy levels increases assessor subjectivity, creating inconsistencies and gaps that undermine the Standard. While the changes may simplify evaluations, they do not clearly improve on the previous approach on degrees of accuracy
<b>114935537358</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114935463463</b>	Non-governmental organisation	114935463463 disagrees. In ERF v1.1, CABs had to apply the ERF tool with explicit trueness and precision guideposts, directly linking evidence quality to SG60/80/100. The new proposal removes these benchmarks: CABs must still “apply the ERF process” but without structured thresholds, leaving adequacy judgments highly subjective. At SG60 there is no longer a requirement for a

		monitoring system, SG80 drops from “high degree of accuracy” to “adequate to estimate,” and SG100 shifts from measurable accuracy to assessor interpretation of “certainty.” This weakens transparency and consistency and expands CAB discretion.
<b>114935201693</b>	Non-governmental organisation	We would support the removal only if CABs were required to explicitly document the rationale for its determination of accuracy for each source of data considered.
<b>114935167081</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114935145363</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114934996080</b>	Non-governmental organisation	<p>Removing structured guidance and explicit degrees of accuracy leads to risks of inconsistency between assessments as the "Consideration of information accuracy" can be interpreted very differently between assessors.</p> <p>There is no clear indication (or ranking) of what type of information could be considered as “high”, “medium” or “low” Accuracy. This increased reliance on expert (assessors) judgment introduces uncertainties and loopholes to the standard, which undermines the Standard overall.</p> <p>Thus, while some of the changes can enhance clarity and simplicity for evaluations, proposed changes, in their current forms, are not considered an improvement.</p>
<b>114934471709</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114921832004</b>	Non-governmental organisation	While removing “degrees of accuracy” simplifies the scoring language, it risks overlooking the need for consistent benchmarks across fisheries. Accuracy assessments could be strengthened by explicitly encouraging the collection of welfare-relevant data (e.g., survival or injury rates of discarded species, handling practices). This would align with initiatives such as the Model Seafood Welfare Standard, which highlights welfare indicators as integral to ecosystem health and consumer expectations.
<b>114934041597</b>	Non-governmental organisation	The use of high, medium and low accuracy does not seem to be an improvement.
<b>114933972264</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114935727997</b>	Academic/scientific professional	Such a change will have adverse impacts on the assessment of ETP/OOS and in-scope unwanted catch species. Rather than placing conditions and making commitments for progress with respect to concrete goals and measures in place.

114935339306	FIP provider	I assume having to refer to Tool B every time will take some getting used to but placing the evaluation of accuracy within ERF ensures consistency throughout the different SGs.
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**“The proposed wording of the information scoring guideposts sets an appropriate sustainability bar for MSC-certified fisheries, noting the prescriptive monitoring thresholds at SG80 and the requirement for assessors to use the ERF.”**



Feedback received		
Respondent ID	Stakeholder Category	Comments
114935220378	Conformity assessment and/or accreditation body	I believe there will still be a considerable amount of expert judgment at the SG80 level - the prescriptive monitoring thresholds are not all that prescriptive for in-zone fisheries (or for the lower-risk fisheries such as handline on the high seas). However, it is the hope of course that the application of the ERF will require assessors to be more robust in their argumentation. This should be supported by good training and calibration from MSC. Overall, the changes need to be thoroughly impact tested. I have a slight concern that the bar may have been lowered compared to the v2.01 standard, in relation to both SG60 and SG80

		(with more fisheries now able to pass information PIs at SG60 than previously, and with more fisheries now achieving unconditional passes at SG80).
<b>114926778971</b>	Conformity assessment and/or accreditation body	Just to say that RFMOs do not "manage" UoAs they manage species and have Member countries who manage fisheries. The wording of SA3.11.3 could be updated to say, "if the UoA target species assessed under P1 is subject to RFMO management and if the UoA operates in whole or in part on the high seas" . Assuming also the MSC is tired of low levels of observer coverage prescribed by RFMOs and seeking to raise the bar in spite of RFMO CMMs already in place.
<b>114935985271</b>	Commercial wild-capture fisheries	We agree with ASF's feedback on this point, which is: "ASF doesn't consider this to be the case, but there is a risk that removing the 'high degree of accuracy' text could be perceived as a lowering of the bar. It will be extremely useful to see the results of any testing, but we anticipate that with good training and implementation, the bar will be very similar but also much more consistent between fisheries (relative to risk)."
<b>114935328811</b>	Commercial wild-capture fisheries	We agree with and support the comments of the Association of Sustainable Fisheries.
<b>114935030286</b>	Commercial wild-capture fisheries	ASF doesn't consider this to be the case, but there is a risk that removing the 'high degree of accuracy' text could be perceived as a lowering of the bar. It will be extremely useful to see the results of any testing, but we anticipate that with good training and implementation, the bar will be very similar but also much more consistent between fisheries (relative to risk).
<b>114930478442</b>	Commercial wild-capture fisheries	Not sure if this is an issue with the translation, but the Japanese doesn't make sense.
<b>114936142847</b>	Non-governmental organisation	I really did not realize where this topic is included, but I agree with this flexibility, even with the fact that the assessors have some range to define the necessary monitoring proportional to the risks.
<b>114935742704</b>	Non-governmental organisation	For ETP species: The proposed changes set far too low of a bar for fisheries to meet the standard for MSC certification. As stated for Q14, the proposed changes make it too easy for a fishery to be certified. For example, it is hard to see a situation where a fishery is not able to meet the minimum scoring threshold of SG60 for PI 2.2.3a for marine mammal bycatch, as only information that are "adequate to broadly understand" impact would be required, and the information could largely be qualitative. Even the threshold for SG80 only requires minimal qualitative information to be available.

<b>114935680642</b>	Non-governmental organisation	<p>No, we strongly disagree with that statement. We express significant concerns that the proposed changes are leading to a weakening of monitoring expectations, rather than setting an appropriate bar.</p> <p>The proposed changes on wording of information scoring guideposts are making it too easy for fisheries to be certified. Indeed, a fishery could be certified without any related Condition (scoring 80 or above) even with minimal quantitative information available on seabird bycatch and compliance with mitigation measures, as long as assessors can demonstrate that “Information is adequate to estimate the impact of the UoA on the ETP/OOS unit and whether the UoA may be a threat to its recovery” (PI 2.2.3a). The minimum scoring threshold SG60 appears also too easy to reach to nearly all fisheries, since only information that are “adequate to broadly understand” impact would be required – which as we understand it, can largely be based on qualitative information. No quantitative or qualitative thresholds are provided.</p> <p>The requirement for "independent observation" at SG60 in Version 3 has been replaced by the weaker "independent verification" at SG80 for most fisheries. This change allows for certification with minimal quantitative bycatch information and very low-coverage and substandard monitoring, including ex-situ data source, creating little incentive for improvement.</p> <p>Additionally, the independent observation requirement for RFMO/High Seas fisheries is reduced from 30% to "at least 20%", questioning why this credible baseline isn't mandated for all MSC fisheries at SG80.</p> <p>Overall, these changes are perceived as aligning MSC's "best practice" with minimum scientific acceptability and industry demands, moving away from its "gold standard" ambition.</p>
<b>114935698418</b>	Non-governmental organisation	<p>The proposed changes, in particular the removal of the phrase “high degrees of accuracy” within the Standard P2 Information requirements at SG80, re-defining “estimate” to mean that only some quantitative information is available, and the removal of prescriptive monitoring thresholds significantly weakens the Standard. In effect, the changes incentivize fisheries to not collect data on environmental, ETP, and OOS species impacts, and disincentivize improvements in monitoring coverage and transparency.</p>

Under the proposed changes, a fishery could be certified without any related conditions, even with minimal quantitative information available on ETP species bycatch and compliance with mitigation measures. The minimum scoring threshold SG60 appears to be easy to reach to nearly all fisheries, since only information that are "adequate to broadly understand" impact would be required –this could largely be based on qualitative information. No quantitative or qualitative thresholds are provided. This is unacceptable when considering the potential risk of fisheries to critically endangered species, where mortality or serious injury to even one individual can be catastrophic.

The starting point for considering impact of a fishery should be risk- for example, if a fishery occurs within an ETP species' range, during a time and in an area where they might be, then there is the possibility it can interact with the gear. If that's the case, is the fishery using gear that is safe for the species, or gear that is modified to be safer and reduce potential for mortality or serious injury? If not, the fishery is adding risk and should be considered a threat to the species. In other words, the MSC should require that a CAB can determine, with strong scientific basis, that the fishery is not hindering recovery of an ETP species, and should provide clear and detailed methodology for how CABs may determine this using a precautionary, risk-based and data-driven approach.

**114935583787** Non-governmental organisation

No, I strongly disagree with that statement. I am concerned that the proposed changes will lead to weaker monitoring expectations rather than setting the bar appropriately.

The proposed changes to the wording of the information scoring guideposts make it too easy for fisheries to be certified. In fact, a fishery could be certified without meeting any conditions (scoring 80 or above), even if minimal quantitative information is available on seabird bycatch and compliance with mitigation measures. This is possible as long as assessors can demonstrate that "information is adequate to estimate the impact of the UoA on the ETP/OOS unit and whether the UoA may threaten its recovery" (PI 2.2.3a). The minimum scoring threshold, SG60, also appears too easy to reach for nearly all fisheries since it only requires information that is "adequate to broadly understand" the impact, which, as we understand it, can largely be based on qualitative information. No quantitative or qualitative thresholds are provided.

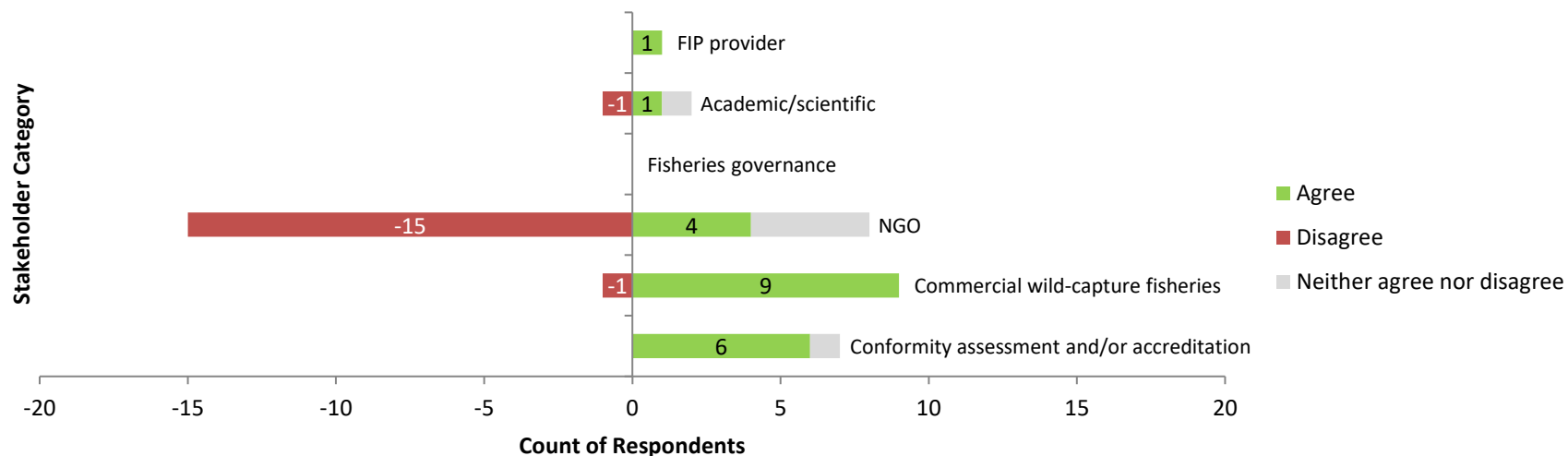
		<p>The requirement for "independent observation" at SG60 in Version 3 has been replaced by the weaker "independent verification" at SG80 for most fisheries. This change allows certification with minimal quantitative bycatch information, very low coverage, substandard monitoring, and an ex-situ data source, creating little incentive for improvement.</p> <p>Additionally, the requirement for independent observation in RFMO/high seas fisheries has been reduced from 30% to "at least 20%." This raises the question of why this credible baseline isn't mandated for all MSC fisheries at SG80.</p> <p>Overall, these changes are perceived as aligning the MSC's "best practices" with the minimum level of scientific acceptability and industry demands, moving away from the organization's "gold standard" ambition.</p>
<b>114935402174</b>	Non-governmental organisation	Lower monitoring expectations make certification easier to achieve with minimal data. By weakening accuracy thresholds, replacing independent observation with weaker verification, and reducing coverage requirements, the revisions risk certifying poorly monitored fisheries and eroding the MSC's credibility as a high standard certification
<b>114935537358</b>	Non-governmental organisation	Duplicate of 114935583787
<b>114935463463</b>	Non-governmental organisation	114935463463 disagrees. The requirement for assessors to "use the ERF" does not restore the safeguards lost by removing explicit trueness and precision thresholds. Under ERF v1.1, the tool directly determined whether SG60/80/100 were met, with clear links to monitoring systems and minimum observer coverage (e.g. ≥30% for high-seas ETP/OOS species). In the new proposal, SG60 no longer requires a functioning monitoring system, SG80 is reduced from a "high degree of accuracy" to "adequate to estimate," and SG100 replaces measurable accuracy with subjective "certainty." While assessors must still apply the ERF process, it now only requires them to consider broad criteria, leaving outcomes dependent on CAB judgement rather than objective benchmarks. This weakens the sustainability bar rather than strengthening it.
<b>114935201693</b>	Non-governmental organisation	We disagree with this statement, as the guidance contained in GSA3.8.3 (especially the last paragraph) is critical in ensuring that the SG80 requirements set an appropriate sustainability bar. However, because it is only guidance, CABs are not required to follow that language and instead could substitute their

		<p>"expert judgement" that shore-side verification would be adequate (as CABs have done in prior assessments)</p> <p>We would suggest that the language be incorporated into the Standard itself, specifically:</p> <p>"If there is catch routinely discarded at sea, verification methods limited to shore-based monitoring (e.g., dockside inspections or cross-referencing with sales notes) would be inadequate, as they would not capture data on discards. In such cases, at-sea verification methods (for example, onboard observers, or electronic monitoring systems using cameras) would be necessary to ensure reliable information."</p>
<b>114935167081</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114935145363</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114934996080</b>	Non-governmental organisation	<p>We disagree with that statement and express significant concerns that the proposed changes are leading to a weakening of monitoring expectations, rather than setting an appropriate bar.</p> <p>The proposed changes on wording of information scoring guideposts make it too easy for fisheries to be certified. Indeed, a fishery could be certified without any related Condition (scoring 80 or above) even with minimal quantitative information available on seabird bycatch and compliance with mitigation measures, as long as assessors can demonstrate that "Information is adequate to estimate the impact of the UoA on the ETP/OOS unit and whether the UoA may be a threat to its recovery" (PI 2.2.3a). The minimum scoring threshold SG60 appears also too easy to reach to nearly all fisheries, since only information that are "adequate to broadly understand" impact would be required – which as we understand it, can largely be based on qualitative information. No quantitative or qualitative thresholds are provided.</p> <p>The requirement for "independent observation" at SG60 in Version 3 has been replaced by the weaker "independent verification" at SG80 for most fisheries. This change allows for certification with minimal quantitative bycatch information and very low-coverage and substandard monitoring, including ex-situ data source, creating little incentive for improvement.</p>

	<p>Additionally, the independent observation requirement for RFMO/High Seas fisheries is reduced from 30% to "at least 20%", questioning why this credible baseline isn't mandated for all MSC fisheries at SG80.</p> <p>Overall, these changes are perceived as aligning MSC's "best practice" with minimum scientific acceptability and industry demands, moving away from its "gold standard" ambition</p>
<p><b>114934471709</b>      Non-governmental organisation</p>	<p>I strongly disagree with the proposed changes, as they significantly weaken monitoring expectations rather than establishing an appropriate standard. These revisions appear to make it excessively easy for fisheries to achieve certification.</p> <p>For instance, a fishery could be certified even with minimal quantitative data on seabird bycatch and compliance with mitigation measures (scoring 80 or above), provided assessors can assert that "Information is adequate to estimate the impact of the UoA on the ETP/OOS unit and whether the UoA may be a threat to its recovery" (PI 2.2.3a).</p> <p>Furthermore, the minimum scoring threshold of SG60 also seems too readily achievable for most fisheries, requiring only information that is "adequate to broadly understand" the impact, which we interpret as potentially relying largely on qualitative data without specified quantitative or qualitative thresholds.</p> <p>Concerningly, the replacement of the "independent observation" requirement at SG60 in Version 3 with a weaker "independent verification" at SG80 for the majority of fisheries. This change facilitates certification despite minimal quantitative bycatch information, very low-coverage, and substandard monitoring, including the use of ex-situ data sources, thereby offering little incentive for genuine improvement.</p> <p>I also question the reduction of the independent observation requirement for RFMO/High Seas fisheries from 30% to "at least 20%", and why this more credible 30% baseline is not mandated for all MSC fisheries at SG80.</p> <p>Overall, these proposed changes risk aligning MSC's "best practice" with mere minimum scientific acceptability and industry demands, departing from its stated "gold standard" ambition</p>

<b>114921832004</b>	Non-governmental organisation	The proposed wording sets a clearer bar for information adequacy, but it does not address welfare-related impacts that also influence sustainability. Including indicators such as injury or survival rates of non-retained species, and handling practices, would give a more complete picture of fishery impacts. This would align MSC with initiatives like the Model Seafood Welfare Standard and growing stakeholder expectations.
<b>114934041597</b>	Non-governmental organisation	<p>It now appears that the bar is set much lower than in the original MSC 3.0 standard.</p> <p>Replacement of the requirement for 30% observer coverage on High Seas fleets with 20% is better than the current 5%, but remains too low to detect the impact on rare and endangered species.</p> <p>Achieving SG60 is now possible with information that is "adequate to broadly understand" any impact on out of scope species, which is vague.</p> <p>The use of independent observation at SG60 was replaced with independent verification at SG80, which appears to be a significant weakening of the standard.</p>
<b>114933972264</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114931893479</b>	Non-governmental organisation	ISSF's concern is more directly related to the prescriptive monitoring thresholds proposed, which we reflected in our responses to that section of the survey.
<b>114899462711</b>	Non-governmental organisation	But check question 14 regarding 20% observation for very extended activities, such as bird-strikes during towing (PI 2.2.3(A)).
<b>114900517337</b>	Academic/scientific professional	the threshold of EFT, like precision of data should be determined too.

**“Overall, I support the proposed changes to the information scoring guideposts.”**



Feedback received		
Respondent ID	Stakeholder Category	Comments
114935220378	Conformity assessment and/or accreditation	I think the changes are a significant improvement from the previous standard, but the changes in SG wording, new definition for 'estimate' and prescriptive monitoring thresholds combined will need to be impact tested.
114935328811	Commercial wild-capture fisheries	We agree with and support the comments of the Association of Sustainable Fisheries.
114935030286	Commercial wild-capture fisheries	Nothing more to add, thank you.
114930478442	Commercial wild-capture fisheries	Unclear where the bar is being set. If it doesn't apply to all fisheries then it should not be set as a scoring guidepost.
114935713917	Non-governmental organisation	While we understand and appreciate MSC trying to simplify the scoring guideposts, we are concerned these changes will weaken the standard that was set in V3.1.
114935680642	Non-governmental organisation	We disagree strongly with this statement. The key issues with the proposed changes being:  Lowered requirements for information adequacy: For the minimum pass level (SG60), information only needs to be "adequate to broadly understand" the

impact, which can largely be based on qualitative information and does not explicitly demand a quantitative approximation. For SG80, information needs to be "adequate to estimate" the impact, defined as a "numeric approximation based on at least some quantitative data".

Too easy to be certified and lack of incentive: These changes make it potentially too easy for fisheries to achieve certification, even with minimal quantitative data on bycatch or compliance, as long as assessors deem the information "adequate". This creates little incentive for fisheries to improve monitoring coverage or increase transparency beyond SG80, as certification can be achieved without conditions.

Increased risk of inconsistency: The removal of structured guidance and specific guideposts for scoring, along with a greater reliance on "expert judgment," raises concerns about inconsistent interpretations between different assessors and certification bodies. There is no clear indication or ranking of what constitutes "high," "medium," or "low" accuracy.

"Race to the bottom": these changes could lead to a "race to the bottom" in sustainability requirements, as they may allow certification with minimal or no independent in-situ monitoring data, even for industrial fleets. This lowering of the bar at SG60 and SG80 could undermine the MSC's "gold standard" ambition.

Weaker verification standard: The proposed changes replace the requirement for "independent observation" at SG80, an objective method of observing catches in situ (e.g., on-board observers or electronic monitoring), with the weaker "independent verification", which allows for less reliable, potentially ex-situ methods like shore-based checks or cross-referencing sales notes, raising concerns about diluted monitoring standards.

**114935698418** Non-governmental organisation

The proposed changes, in particular the removal of the phrase "high degrees of accuracy" within the Standard P2 Information requirements at SG80, re-defining "estimate" to mean that only some quantitative information is available, and the removal of prescriptive monitoring thresholds significantly weakens the Standard. In effect, the changes incentivize fisheries to not collect data on

		<p>environmental, ETP, and OOS species impacts, and disincentivize improvements in monitoring coverage and transparency.</p> <p>Under the proposed changes, a fishery could be certified without any related conditions, even with minimal quantitative information available on ETP species bycatch and compliance with mitigation measures. The minimum scoring threshold SG60 appears to be easy to reach to nearly all fisheries, since only information that are “adequate to broadly understand” impact would be required –this could largely be based on qualitative information. No quantitative or qualitative thresholds are provided. This is unacceptable when considering the potential risk of fisheries to critically endangered species, where mortality or serious injury to even one individual can be catastrophic.</p>
<b>114935463463</b>	Non-governmental organisation	114935463463 cannot support the proposed information guideposts. Compared to v3.1 and ERF v1.1, they weaken the minimum entry requirement at SG60, reduce SG80 from requiring a “high degree of accuracy” to only being “adequate to estimate,” and replace SG100’s “very high degree of accuracy” with the subjective concept of “certainty.” The requirement for assessors to use the ERF does not compensate, since the ERF has been reduced from a structured tool with explicit trueness/precision thresholds to a procedural checklist, leaving wide room for interpretation by CABs. Without binding benchmarks, observer/EM coverage minima, and explicit criteria for independence, uncertainty, and reproducibility, the guideposts risk entrenching data-poor fisheries in MSC certification and lowering the overall sustainability bar.
<b>114935167081</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114935145363</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114934996080</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114934471709</b>	Non-governmental organisation	<p>I strongly disagree with the proposed changes to the fisheries certification standards due to several critical issues.</p> <p>Firstly, the lowered requirements for information adequacy are concerning. At the minimum pass level (SG60), information only needs to be “adequate to broadly understand” impacts, relying heavily on qualitative data without an explicit demand for quantitative approximation. For SG80, “adequate to</p>

estimate" is defined as a "numeric approximation based on at least some quantitative data". This dilution of data requirements could lead to certification being too easily attained.

Secondly, this ease of certification creates a lack of incentive for improvement. Fisheries may achieve certification even with minimal quantitative data on bycatch or compliance, as long as assessors deem the information "adequate". This discourages them from enhancing monitoring coverage or increasing transparency beyond SG80, as certification can be secured without conditions.

Thirdly, there is an increased risk of inconsistency. The removal of structured guidance and specific guideposts for scoring, combined with a greater reliance on "expert judgment," raises significant concerns about varying interpretations among assessors and certification bodies. There is no clear indication or ranking of what constitutes "high," "medium," or "low" accuracy.

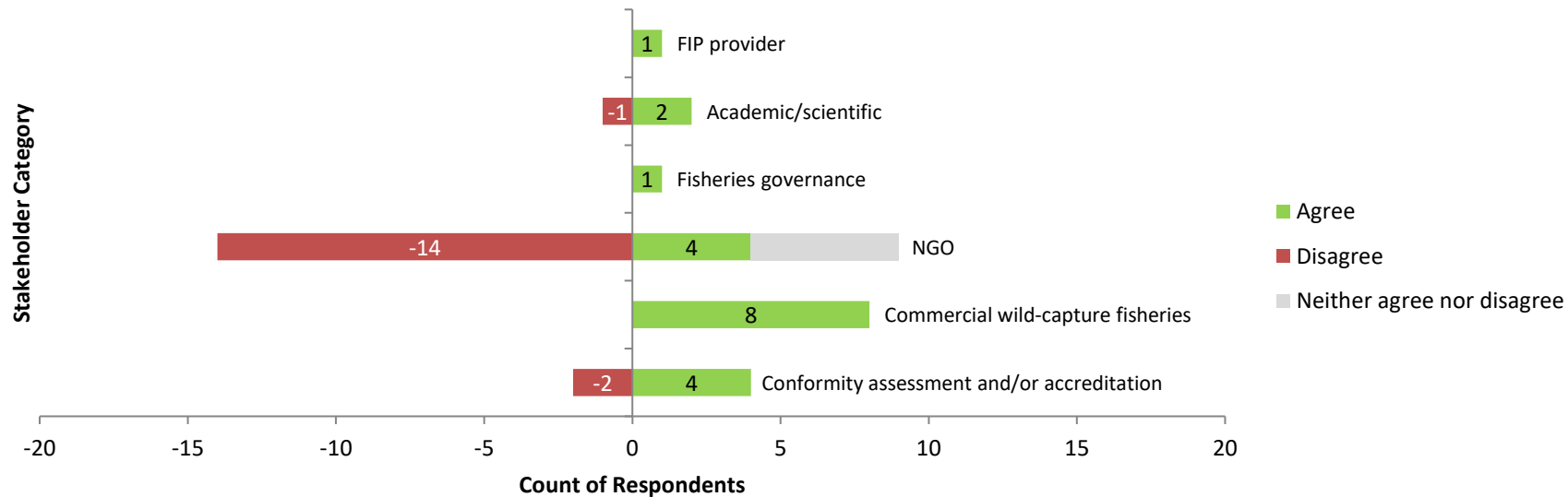
Fourth, these changes may lead to a "race to the bottom" in sustainability requirements. They may allow certification with minimal or even no independent in-situ monitoring data, even for industrial fleets. This lowering of the bar at SG60 and SG80 could significantly undermine the MSC's aspiration to be a "gold standard".

Finally, the proposed changes introduce a weaker verification standard. The requirement for "independent observation" at SG80, an objective method involving in-situ observation of catches (e.g., on-board observers or electronic monitoring), is replaced with "independent verification". This allows for less reliable, potentially ex-situ methods such as shore-based checks or cross-referencing sales notes, thereby diluting monitoring standards.

<b>114921832004</b>	Non-governmental organisation	The changes improve clarity, but they remain incomplete without incorporating welfare-relevant indicators. Data on handling practices, injury, and survival of non-retained species would strengthen the adequacy of information and align with frameworks such as the Model Seafood Welfare Standard.
<b>114934041597</b>	Non-governmental organisation	For the reasons stated in previous answers.
<b>114933972264</b>	Non-governmental organisation	Duplicate of 114935680642

<b>114931893479</b>	Non-governmental organisation	ISSF overall agrees with the changes made to the information scoring guideposts but has concerns related to how these will be interpreted and scored by the assessors. ISSF's comments on the guidance and prescriptive monitoring requirements are addressed elsewhere in this survey.
<b>114935727997</b>	Academic/scientific professional	<p>Regarding negligible mortalities for in-scope and ETP species, one has to mention that 5,000-population threshold does not mean anything if the mortality limit of the population is exceeded and there are sharp declines in population size. For instance, for the vulnerable Baltic Belt Sea harbor porpoise population, recent assessments indicate a population of 17,301 harbour porpoises (95% CI = 11,695-25,688; CV = 0.20), with an average density of 0.41 individuals/km<sup>2</sup> (95% CI = 0.28-0.61). This is the lowest abundance estimate since the first (SCANS) survey was conducted in 1994 (Unger et al., 2021. see: Mini scans report 20210913_Report_MiniSCANSII_2020_revised.pdf).</p> <p>Moreover, recent studies indicate an estimated bycatch of 900 animals that far exceeds the mortality limit for the population (n=24 animals) (see: Owen et al., 2024. Frontiers   A negative trend in abundance and an exceeded mortality limit call for conservation action for the Vulnerable Belt Sea harbour porpoise population.</p> <p>It is important to remember that bycatch for ETP species may be greatly underestimated, due to the absence of data and long-term monitoring schemes. In the Belt Sea example above no data for German fleet, part time, or recreational fishers exist.</p>

The term ‘estimate’ is used at the SG80 (best-practice) level. “I support the use of the updated definition of ‘estimate’ (“to make a numeric approximation based on at least some quantitative data”) in the context of compliance information.”



Feedback received		
Respondent ID	Stakeholder Category	Comments
114935854975	Conformity assessment and/or accreditation	In practice it is very difficult to meaningfully “estimate” compliance in fisheries. Access to compliance records is often limited, and in many cases management authorities only provide evidence of sanctions applied. If there are no recorded infringements, then there are no sanctions to review, which does not necessarily equate to high compliance. This gap makes it hard to develop even a numeric approximation, as the definition of “estimate” requires. The framework is useful for checking accuracy, but the reality is that the available information is often insufficient to support a quantitative estimate of compliance. In these cases, the team may only be able to document the absence of infringements. Would suggest a compliance-focused ERF add-on that spells out what kinds of information are actually relevant to compliance

		(monitoring inputs, clear documentation of things like rate of infringement relative inspections, number of sanctions applied, etc).
<b>114935220378</b>	Conformity assessment and/or accreditation	It is not always feasible to obtain a numerical estimate for compliance. Often there is a reliance on fishery authorities to make an overall determination on compliance instead (where they will have access to the quantitative data but cannot/will not share this with CABs). Requiring a quantitative approach at the SG80 level may therefore hamstring teams and clients too much for no good reason. The question is also whether this quantitative information pertains to inspection rates, details on infractions etc. as there will be multiple sources of information that can inform on compliance. If only certain sources are available (e.g. no data on inspection rates, but confirmation from the authorities that there are no violations), is this enough to meet SG80? This is not clear to me at present.
<b>114926778971</b>	Conformity assessment and/or accreditation	Information is adequate to "determine" compliance in the UoA - may be alternative SG text
<b>114935328811</b>	Commercial wild-capture fisheries	We agree with and support the comments of the Association of Sustainable Fisheries.
<b>114935030286</b>	Commercial wild-capture fisheries	Agree – all comments made previously on this change for information PIs apply here, also.
<b>114930478442</b>	Commercial wild-capture fisheries	It is unclear but at the same time it feels inevitable.
<b>114935742704</b>	Non-governmental organisation	We disagree with this for the same reasons as above: While we agree that the consideration of quantitative information is important for scoring, we are concerned that no guidance on what type of quantitative information meets the threshold for scoring is provided. Moreover, if Assessors are required to develop a numeric approximation based on minimal quantitative data, errors in the estimate are more likely to be made. In this case, an Assessor's opinion or judgement of the situation (e.g., there is not enough quantitative information available to make a reliable estimate) may lead to a more reliable assessment.
<b>114935680642</b>	Non-governmental organisation	This comment is similar to the one applying to 2.2.3. While the clarification provided by the new definition of "estimate" - compared to the previous definition – might be positive, there remain problematic uncertainties around this new definition and the shift in location for Scoring Guidepost of prescriptive monitoring thresholds.
		The redefinition of "estimate" as "to make a numeric approximation based on at

least some quantitative data" is problematic, as the phrase "at least some" is too vague and offers little incentive for fisheries to improve compliance information beyond SG80.

Under those changes, fisheries can be certified without conditions even with very low compliance monitoring and anecdotal data, provided there is some form of numerical estimate. The high degree of accuracy (SG80) and very high degree of accuracy (SG100), while imperfect, were providing some scoring guidelines to assessors. And their removal allows fisheries to reach SG80 at nearly any compliance monitoring rate – e.g. we do not see why a fishery with less than 1% compliance monitoring coverage, could be denied access of SG80 under the proposed changes.

This change, in connection with the weakened data requirements for 2.2.3 by largely replacing the more robust "independent observation" with the weaker "independent verification", are weakening the monitoring and compliance requirements overall. They create no incentive for fisheries to increase their compliance monitoring and transparency and, combined with the removal of "degrees of accuracy", lead to increased reliance on "expert judgment," creating risks of inconsistency between assessments.

Finally, the need for an "estimate" – to make a numeric approximation based on at least some quantitative data – on Compliance Information should be applied at SG60 level, not SG80. As currently proposed by MSC, the new Standard will allow fisheries that might be non-compliant with international and/or national regulations, and recognized best practices, to be certified without much effort.

**114935583787** Non-governmental organisation

This comment is similar to the one that applies to 2.2.3. Although the new definition of "estimate" is more clear than the previous one, there are still uncertainties around the new definition and the shift in location for the Scoring Guidepost of prescriptive monitoring thresholds.

The redefinition of "estimate" as "to make a numeric approximation based on at least some quantitative data" is problematic because the phrase "at least some" is too vague. This definition offers little incentive for fisheries to improve

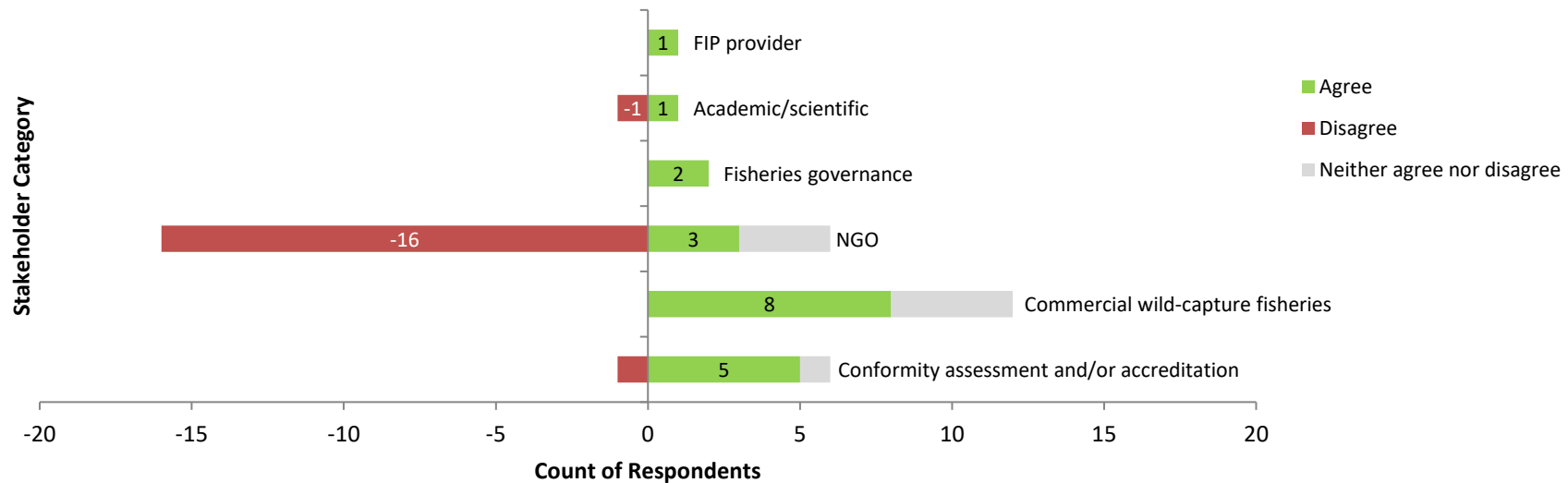
	<p>their compliance information beyond SG80.</p> <p>With these changes, fisheries can be certified with no conditions, even with low compliance monitoring and anecdotal data, as long as there is some form of numerical estimate. While imperfect, the high (SG80) and very high (SG100) degrees of accuracy provided some scoring guidelines to assessors. Their removal allows fisheries to reach SG80 with nearly any compliance monitoring rate. For example, we see no reason why a fishery with less than 1% monitoring coverage could be denied SG80 under the proposed changes.</p> <p>This change, in conjunction with the weakened data requirements of 2.2.3, which largely replace the more robust "independent observation" with the weaker "independent verification," weakens the monitoring and compliance requirements overall. These changes create no incentive for fisheries to increase their compliance monitoring or transparency. Combined with the removal of "degrees of accuracy," they lead to increased reliance on "expert judgment," creating risks of inconsistency between assessments.</p> <p>Finally, the need for an "estimate" — a numeric approximation based on quantitative data — should be applied at the SG60 level, not the SG80 level. As currently proposed by the MSC, the new standard will certify fisheries that are non-compliant with international and/or national regulations and recognized best practices without much effort.</p>
<p><b>114935402174</b> Non-governmental organisation</p>	<p>The new MSC definition of "estimate" and relocation of monitoring thresholds weakens compliance requirements. Defining an estimate as a "numeric approximation based on at least some quantitative data" is too vague, allowing fisheries to achieve SG80 certification even with minimal monitoring (e.g., &lt;1% coverage) or anecdotal data. The removal of "degrees of accuracy" eliminates guidance for assessors and reduces incentives to improve monitoring. Combined with the shift from independent observation to the weaker independent verification under 2.2.3, these changes increase reliance on expert judgment, risking inconsistency across assessments. The requirement for an estimate should apply from SG60, not SG80, to prevent certifying fisheries that may be non-compliant with regulations or best practices onboard.</p>
<p><b>114935537358</b> Non-governmental organisation</p>	<p>Duplicate of 114935583787</p>

<b>114935463463</b>	Non-governmental organisation	Replacing “high degree of accuracy” with “estimate” (just “some quantitative data”) lowers the bar for compliance evidence and expands CAB discretion. Compliance data are often sensitive/incomplete—this makes clear, binding benchmarks more important, not less. We’ve seen cases with strong indications of non-compliance that had minor scoring consequences due to vague requirements (e.g. VME bycatches in the Norwegian cod fleet; Discards of North Sea cod in the demersal North Sea fisheries; etc.); weakening the benchmark risks repeating this.
<b>114935201693</b>	Non-governmental organisation	We believe that the MSC should re-consider and clarify the intent of its compliance information and outcome elements. For the information scoring guideposts, it is unclear to us how CABs would assign a “numeric approximation” to many compliance issues that are binary – either there is compliance with a measure, or there is not compliance. And if they are able to determine a “numeric approximation”, does that make 3.2.3 (d) redundant?
<b>114935167081</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114935145363</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114934996080</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114934471709</b>	Non-governmental organisation	<p>There is significant concerns regarding the revised definition of “estimate” and its implications for fisheries certification. The new definition, "to make a numeric approximation based on at least some quantitative data," is problematic due to the vague phrase “at least some,” which offers insufficient incentive for fisheries to enhance their compliance information beyond SG80. This change could permit the certification of fisheries without conditions, even if their compliance monitoring is very low or relies predominantly on anecdotal data, provided a numerical estimate is present.</p> <p>The removal of prescriptive monitoring thresholds and "degrees of accuracy" (SG80 and SG100), which previously offered clear scoring guidelines, is particularly troubling. This adjustment may enable fisheries to achieve SG80 with nearly any compliance monitoring rate, potentially even with coverage less than 1%. When combined with the weakened data requirements in 2.2.3, which</p>

		<p>largely replace "independent observation" with the less robust "independent verification," these changes collectively dilute the overall monitoring and compliance requirements. This framework provides no clear incentive for fisheries to improve their compliance monitoring and transparency.</p> <p>Furthermore, these modifications are likely to increase reliance on "expert judgment," which risks creating inconsistencies across different assessments. We recommend that the requirement for an "estimate" for Compliance Information be applied at the SG60 level, rather than SG80, to ensure a more robust standard. The current proposal for the new Standard risks allowing fisheries that may not comply with international and/or national regulations and recognized best practices to be certified with insufficient effort</p>
<b>114934041597</b>	Non-governmental organisation	The clarity in requirement of quantitative information is beneficial, though inclusion of "at least some" leaves this quite weak..
<b>114933972264</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114931893479</b>	Non-governmental organisation	ISSF agrees with the statement, but considers it should also apply to SG60 (see our responses under the "Changes to prescriptive catch monitoring thresholds" section).
<b>114935727997</b>	Academic/scientific professional	See answers above

# Appendix III: Stakeholder consultation feedback, Monitoring Requirements

SG60 requirement: “I support the proposal to require that assessors use the ERF to evaluate whether information is adequate for a ‘broad understanding’ of impacts at the SG60 level, noting that this would remove the prescriptive monitoring requirement.”



Feedback received		
Respondent ID	Stakeholder Category	Comments
114935854975	Conformity assessment and/or accreditation	Removing the prescriptive threshold is appropriate because the ERF will still be used to support the broad understanding at SG60 or estimates for higher scores.
114935220378	Conformity assessment and/or accreditation	Please see my earlier comments about a potential lowering of the bar at the SG60 level (compared with the v2.01 standard). While I do think the changes are helpful and much clearer than the previous V3 version, I am concerned that

		given the lack of prescriptive monitoring thresholds, the new ERF may not be sufficient to ensure MSC's intent here is met. Perhaps training and calibration may be sufficient to prevent a potential lowering of the bar, but it is a risk that should be explored through impact testing.
<b>114905584606</b>	Conformity assessment and/or accreditation	I think the new proposed changes will make it more feasible for fisheries to remain certified. Specially yhe 30% for all gears (in SG80) was ver unreallistic.
<b>114936439716</b>	Commercial wild-capture fisheries	I think it would be better if the judgement were based on a careful consideration of the information submitted, rather than requiring assessors to use the ERF for evaluation of a'broad understanding'.
<b>114935985271</b>	Commercial wild-capture fisheries	We generally agree but would support a change to "generally understand" at the SG60 level to avoid confusion regarding what constitutes a "broad understanding."
<b>114935328811</b>	Commercial wild-capture fisheries	We agree with and support the comments of the Association of Sustainable Fisheries.
<b>114935030286</b>	Commercial wild-capture fisheries	As noted in earlier comments, we would support a change to 'generally understand' at the SG60 level throughout, but in other regards we agree.
<b>114935742704</b>	Non-governmental organisation	The proposal to shift the previous requirements for SG60 level in Version 3 to the SG80 level is a significant and consequential step back in the sustainability of the Standard. We appreciate that the changes are designed to bring fisheries of all scales under a single Standard, but in doing so the requirements for the most impactful RFMO/High Seas fisheries have been significantly weakened. It would be preferable to create a tiered Standard for the PMF, where large scale, high-seas fisheries are subjected to rigorous requirements at SG60, and where smaller-scale fisheries still have some specific but feasible monitoring requirements for SG60.
<b>114935713917</b>	Non-governmental organisation	We strongly disagree with this statement and do not support the proposed changes to prescriptive monitoring standards. This significantly lowers the bar for fisheries and will enable those with inadequate monitoring systems to be certified, potentially without any conditions. This will deter the fisheries from doing anything to improve their monitoring standards.
<b>114935680642</b>	Non-governmental organisation	While some changes to the ERF to evaluate information adequacy can be understood to simplify the assessment, westrongly disagree with the removal of the prescriptive monitoring requirement, especially at SG60 and SG80 for most fisheries. We also think that the definition of "broadly understanding" impact or compliance is poor, clearly lacks ambition and scientific robustness, and as such

is currently unfit as a functional part of the MSC Standard. Some of our key concerns:

- The proposed changes would significantly lower the bar for certification at SG60, allowing fisheries to pass with minimal or near zero independent in-situ monitoring data, often relying on qualitative information, and replacing "independent observation" with the weaker "independent verification" at SG80.
- These changes create little to no incentive for fisheries to improve monitoring coverage and transparency beyond SG80 or even SG60, as certification without conditions becomes achievable with substandard monitoring, thereby discouraging progress towards "Best Practice" standards.
- Removing structured guidance for scoring of Information adequacy from the Evidence Requirements Framework (ERF), and the lack of those on the Standard itself, will lead to inconsistency and subjectivity in assessments, as certification bodies and assessors may interpret the standard differently, ultimately resulting in varied certification quality between fisheries.
- While arguing that some of those changes are to be inclusive of smaller-scale fisheries, the proposals end up particularly benefiting industrial fisheries and undermining the MSC's reputation as a "gold standard" by aligning its "good/best practice" with minimum, often inadequate, existing monitoring requirements.
- The removal of prescriptive thresholds disregards scientific evidence supporting minimum monitoring coverage levels (e.g.,  $\geq 5\%$  for some bycatch risks,  $\geq 20\%$  for frequently caught species,  $\geq 50\%$  for infrequently caught species), which are crucial for robust bycatch estimation, ensuring minimum compliance, and should be implemented as mandatory scoring guideposts for medium to industrial fisheries (with possible tailored rates for smaller-scale fisheries if required).

**114935698418**

Non-governmental organisation

Under the proposed modification to the ERF, assessors merely need to ensure that there is data available "to make a numeric approximation based on at least some quantitative data" of impacts at the SG60 level. This requirement is not sufficient to effectively support the ETP/OOS requirements under P2 of the

	<p>standard, for example, consideration of observed and unobserved mortality of P2 species, nor is it sufficient for assessors to independently determine the accuracy and veracity of available data as it pertains to a specific fishery. The proposed changes would effectively allow a data-deficient fishery with significant, yet undocumented impacts to ETP species to become MSC-certified.</p>
<p><b>114935583787</b> Non-governmental organisation</p>	<p>While some changes to the ERF to evaluate information adequacy could simplify the assessment, I strongly disagree with the removal of the prescriptive monitoring requirement, especially at SG60 and SG80 for most fisheries. Additionally, I believe that the definition of "broad understanding" of impact or compliance is inadequate, lacks ambition and scientific robustness, and is currently unfit to be a functional part of the MSC Standard. Some of key concerns are as follows:</p> <ul style="list-style-type: none"> <li>•The proposed changes would significantly lower the bar for certification at SG60, allowing fisheries to pass with minimal or zero independent in-situ monitoring data. Often, they would rely on qualitative information and replace "independent observation" with the weaker "independent verification" at SG80.</li> <li>•These changes create little to no incentive for fisheries to improve monitoring coverage and transparency beyond SG80 or even SG60 because certification without conditions becomes achievable with substandard monitoring. This discourages progress toward "best practice" standards.</li> <li>• Removing structured guidance for scoring information adequacy from the Evidence Requirements Framework (ERF) and the standard itself will lead to inconsistent and subjective assessments because certification bodies and assessors may interpret the standard differently. Ultimately, this will result in varied certification quality between fisheries.</li> <li>• While the proposals argue that they are inclusive of smaller-scale fisheries, they actually benefit industrial fisheries, undermining the MSC's reputation as a "gold standard" by aligning its "good/best practice" with minimum and often inadequate existing monitoring requirements.</li> <li>• The removal of prescriptive thresholds disregards scientific evidence supporting minimum monitoring coverage levels (e.g., ≥5% for some bycatch</li> </ul>

		risks, $\geq 20\%$ for frequently caught species, and $\geq 50\%$ for infrequently caught species). These levels are crucial for robust bycatch estimation and ensuring minimum compliance. They should be implemented as mandatory scoring guidelines for medium- to industrial-scale fisheries (with possible tailored rates for smaller-scale fisheries, if required).
<b>114935402174</b>	Non-governmental organisation	The proposed ERF changes weaken the MSC Standard by removing prescriptive monitoring requirements at SG60 and SG80, lowering certification thresholds, and replacing “independent observation” with weaker forms of verification. This reduces incentives for fisheries to improve monitoring, risks inconsistent and subjective assessments, and primarily benefits industrial fisheries while undermining MSC’s credibility as a gold standard. The lack of scientific thresholds ignores established evidence on minimum monitoring coverage (e.g., $\geq 5\%$ , $\geq 20\%$ , $\geq 50\%$ ), which should remain mandatory to ensure robust compliance and bycatch estimation.
<b>114935537358</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114935463463</b>	Non-governmental organisation	114935463463 welcomes recognition of the need for independent verification but disagrees that the proposal is sufficient. First, moving the requirement from SG60 to SG80 weakens the minimum entry bar, allowing fisheries to enter certification with no monitoring system and only a subjective adequacy judgement. Second, the proposal dilutes “independent observation” into broader “verification,” which may include methods that are not capable of detecting bycatch of ETP/OOS species or habitat impacts. Observer or electronic monitoring should remain the default method of independent verification at sea, with other approaches accepted only where they can credibly deliver equivalent reliability.
<b>114935167081</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114935145363</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114934996080</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114934471709</b>	Non-governmental organisation	While some modifications to the Evidence Requirements Framework (ERF) aimed at evaluating information adequacy might be seen as simplifying the assessment process, the removal of the prescriptive monitoring requirement,

particularly at SG60 and SG80 for most fisheries, is a significant concern. The definition of "broadly understanding" impact or compliance is poor, lacking ambition and scientific robustness, making it unfit as a functional part of the MSC Standard. Further, the proposed changes would significantly lower the bar for certification at SG60, allowing fisheries to achieve certification with minimal or near-zero independent in-situ monitoring data, often relying on qualitative information. Additionally, "independent observation" is replaced with the weaker "independent verification" at SG80. These changes are seen to create little to no incentive for fisheries to improve monitoring coverage and transparency beyond SG80 or even SG60. This is because certification without conditions could become achievable with substandard monitoring, thereby discouraging progress towards "Best Practice" standards.

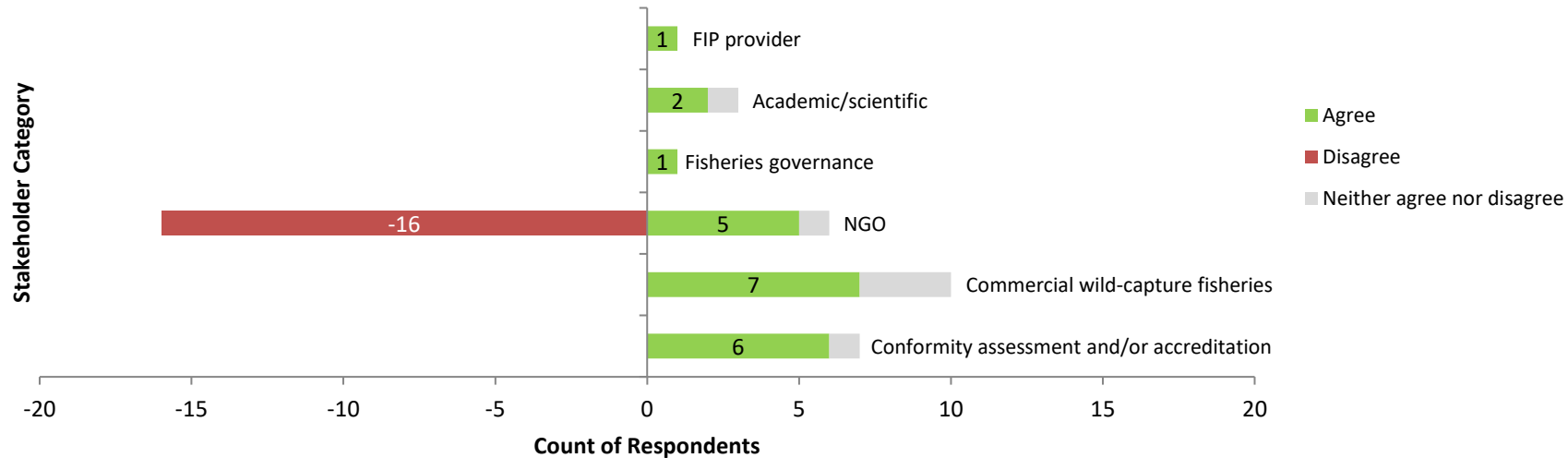
The removal of structured guidance for scoring information adequacy from the ERF, coupled with its absence in the Standard itself, will likely lead to inconsistency and subjectivity in assessments. This may result in certification bodies and assessors interpreting the standard differently, ultimately causing varied certification quality between fisheries. While some changes aim to be inclusive of smaller-scale fisheries, the proposals will particularly benefit industrial fisheries. This undermines the MSC's reputation as a "gold standard" by aligning its "good/best practice" with minimum, often inadequate, existing monitoring requirements.

Finally, the removal of prescriptive thresholds disregards scientific evidence that supports minimum monitoring coverage levels. Examples include requirements of  $\geq 5\%$  for some bycatch risks,  $\geq 20\%$  for frequently caught species, and  $\geq 50\%$  for infrequently caught species. These levels are considered crucial for robust bycatch estimation and ensuring minimum compliance, and they should be implemented as mandatory scoring guideposts for medium to industrial fisheries (at least 30%), with possible tailored rates for smaller-scale fisheries if needed.

<b>114934041597</b>	Non-governmental organisation	I disagree with the removal of prescriptive monitoring at SG60 as most fisheries could obtain certification with very little observer coverage or onboard monitoring. Noting infrequently caught / rare species requires >50% coverage.
<b>114933972264</b>	Non-governmental organisation	Duplicate of 114935680642

<b>114931893479</b>	Non-governmental organisation	ISSF disagrees with the proposal to set no monitoring requirements at the SG60 level. No fishery should be eligible for certification if it cannot provide at least some quantitative self-reported catch data and a minimum level of independent data, (e.g. the independent observer coverage requirement adopted by the RFMO), to enable assessors to characterize its impacts. An exception could be considered —consistent with what is proposed at SG80— for pole and line, troll and handline fisheries that operate partially or fully in the high seas.
<b>114935339306</b>	FIP provider	Agree. The shift to ‘adequate to estimate’ gives both small-scale fisheries and early MSC adopters a fair shot in data-limited, cost-constrained, seasonal contexts. Self-reported logs and operator video can be highly effective when paired with a robust, independent verification pathway. Crucially, in jurisdictions where regulation is not moving toward observers or mandatory EM, a tech-neutral menu of verification options (dockside checks, random audits, reconciliations, or EM where appropriate) preserves rigor without imposing tools the regulatory system isn’t set up to support.

"I support the proposal to require all certified fisheries to have a system in place to independently verify self-reported catch data to meet SG80."



Feedback received		
Respondent ID	Stakeholder Category	Comments
114935854975	Conformity assessment and/or accreditation	See previous; reasonable requirement.
114926520123	Conformity assessment and/or accreditation	In theory I agree, but in practice this may not be feasible cost-wise for fisheries that do not have external mechanisms or support to independently verify catch data.
114932567343	Conformity assessment and/or accreditation	How will this be implemented specifically? We understand the need for it, but we are concerned about the financial burden it will place on the economy in the future.
114931975029	Conformity assessment and/or accreditation	On the theme of EM I would like to see clear guidance from MSC on the expectations regarding EM. CABs have seen in the past few years that not all EM programs are created equal. Many have no legitimate end point in the

		competent authorities, some are entirely fisher funded and the types and degrees of analysis vary massively between the programs. Some EM systems are designed for catch composition capture some for compliance and some for both. There is widespread abuse of the term EM in MSC fisheries from clients, providers, consultants and to a level CABs which is causing issues in FCR2.01. MSC have a chance in v3.x to dictate what EM programs suitable to score - shark finning SIs, data adequacy SIs etc look like. This is an opportunity MSC should take.
<b>114905584606</b>	Conformity assessment and/or accreditation	I would add some guidance on what MSC expects as different independently self-reported verification of catch data
<b>114936603760</b>	Commercial wild-capture fisheries	I can't visualize how this can be verified in practical terms. I have no idea how to evaluate the costs or what the prospects are.
<b>114936439716</b>	Commercial wild-capture fisheries	The definition of 'independent verification' is unclear.
<b>114935985271</b>	Commercial wild-capture fisheries	We are conceptually supportive of a requirement to independently verify self-reported catch data, but note our hope that this requirement can be met by ad-hoc efforts such as periodic at-sea monitoring programs or the development of a reference fleet to provide some level of verification. If this requirement is interpreted as a requirement for consistent, indefinite at-sea monitoring of catch, small-boat fishers in Alaska will likely be unable to met this requirement absent significant government investment and support for EM adoption.
<b>114934071628</b>	Commercial wild-capture fisheries	this would limit coastal fisheries for certification to where government has the good review system, but leaves other fisheries without.
<b>114934879929</b>	Commercial wild-capture fisheries	independent verification (depending on its definition) for smaller scale fisheries is not always feasible - the fisheries/processors/management agencies do not have the required funds to allocate to independently verify catches within our fishery (if we are talking about on-board observers/video etc), although a robust management system is in place (with dockside verification for a certain proportion of catches).
<b>114935328811</b>	Commercial wild-capture fisheries	We agree with and support the comments of the Association of Sustainable Fisheries.
<b>114935030286</b>	Commercial wild-capture fisheries	Noting again the need for explicit consideration of risk under B4.1.3 – 4.1.4, the ASF believes it is appropriate for SG80 level fisheries to have some level of independent verification of self-reported catch data. However, we believe that the guidance is somewhat unclear with regard to the utility of shore-based monitoring in cases of discarding:

GSA3.8.3 “For instance, if there is catch routinely discarded at sea, verification methods limited to shore-based monitoring (e.g., dockside inspections or cross-referencing with sales notes) would be inadequate, as they would not capture data on discards. In such cases, at-sea verification methods (for example, onboard observers, electronic monitoring systems using cameras or reference fleets) would be necessary to ensure reliable information.”

Here, we recognize that ‘routine discarding’ will be interpreted differently by different assessors and other stakeholders. Further, while some jurisdictions have developed information systems designed around mandatory retention of catch, that mandatory retention must of course cover the specific component under consideration (e.g., in-scope species, or ETP/OOS species) if it is to meet SG80. However, even for components that are covered, there should be some evidence to demonstrate a system’s robustness (for example through comparing reference fleet data, occasional observer or scientific data with wider fishery data, or through consideration of opportunistic at-sea inspection data). Simply relying on a mandatory rule or the existence of a reference fleet (without demonstrating that the data collected are used to verify catches in the wider fishery) should not be adequate to meet SG80, in particular for ETP/OOS.

<b>114934657790</b>	Commercial wild-capture fisheries	Would like to know what system will be sufficient to independently verify self-reported catch data to meet SG80 for pole-and-line vessels.
<b>114931697757</b>	Commercial wild-capture fisheries	There didn't seem a good place to make my comment on this particular point, so I will make it here. I do not agree with there not being an SG100 rating for monitoring, when the requirement for SG80 is a mere 20% coverage. Fisheries that have 100% observer coverage (most toothfish fisheries) should be rewarded with an SG100 as best practice.
<b>114930478442</b>	Commercial wild-capture fisheries	I am not sure if independent data can be prepared for all species.
<b>114936268484</b>	Non-governmental organisation	I think if we remove this from SG60, there should be some requirement for Vessel tracking—for example, is there VMS or AIS? So, in the absence of an onboard vessel, there is still 'some' third-party data being collected that indicates the location of the vessel—and if the data is good enough, information to indicate fishing activity.

So while the catch compositions and/or ETP are still largely self-reported, I think

		<p>it's fair for SG60 to have basic AIS or VMS, which often integrates maritime safety and is helpful in reducing other risk factors.</p> <p>This also helps make a layered approach as a fishery moves from SG60 to SG80.</p> <p>One could also increase that %AIS or VMS requirement (depending on whether fishing inside or outside territorial waters)</p>
<b>114935742704</b>	Non-governmental organisation	This should be required at SG60, and the requirements should go far beyond simply having some form of independent verification that can be ex situ and occur at no specified rate.
<b>114935713917</b>	Non-governmental organisation	We strongly disagree with this proposed change. It is well known that self-reporting catch systems have many issues with them (incorrect data, biased reporting, etc.,) and this is an incredibly weak bar for a fishery to achieve SG80 and removes any incentive for fisheries to move towards robust catch data reporting systems.
<b>114935680642</b>	Non-governmental organisation	<p>We believe that this requirement should occur at SG60, not SG80.</p> <p>The definition of a “system in place” is too vague and “independent verification” is a drawback from “independent observation”. It needs numerical thresholds that are supported by scientific evidence – e.g. &gt;20% to achieve SG80; 50-100% to achieve SG100.</p> <p>Self-reported data should be a requirement at SG60, not SG80. It is highly concerning that the MSC is contemplating awarding certification to fisheries – even with condition - with no systematic self-reporting and data verification (via in-situ observation) already in place.</p> <p>There are enough existing fishery’s management improvement frameworks – such as the MSC Improvement Program, or Fisheries Improvement Projects (FIP) – to ensure that those basic fishery management standards are implemented before accessing potential certification.</p>
<b>114935698418</b>	Non-governmental organisation	Again, this is a minimum requirement in terms of environmental responsibility, rather than “best practice”, and should be set at SG60. Stronger, more prescriptive monitoring is necessary and appropriate for all fisheries/vessels at

both the SG60 and 80 levels. Revert to or reinforce the requirement for "independent observation" at SG60 for most fisheries, rather than the weaker "independent verification," at SG80 which allows for methods like less reliable shore-based checks instead of on-board observers or electronic monitoring. As proposed, there is no incentive through the MSC for fisheries to improve levels of independent data collection and verification.

While it is true that appropriate levels of observer coverage vary by fishery and gear type, for reliable estimates of bycatch mortality, observer coverage is recommended to be at least 20% of fishing effort, 50% if the species is rare (Babcock et al. 2003). Additionally, studies have concluded that higher levels of independent observer coverage are appropriate when determining bycatch mortality "with confidence" (e.g. Diaz 2010). ETP and OOS species by nature of their smaller population sizes necessitate higher levels of fisheries data collection and validation to generate reliable estimates on interactions (typically above 20% observer coverage rates).

Furthermore, fishers are incentivized to underreport or misreport bycatch, injury and mortality of non-target species, or simply may lack the knowledge necessary to correctly identify them (e.g. Burns and Kerr 2008; Faunce et al. 2015). For example, Basran and Sigurdsson (2021) found that in New Zealand, the United States, and Iceland – three countries generally considered data-rich and with effective fisheries management - cetacean bycatch recorded by observers was between 774% and 7,347% higher than logbook data. Fisheries managers treat as established fact that self-reported data has extremely high levels of uncertainty, with error levels often exceeding 100% (e.g. SAFMC "Review of Standardized Bycatch Reporting Methodology for the South Atlantic and Joint Fishery Management Plans", 2022).

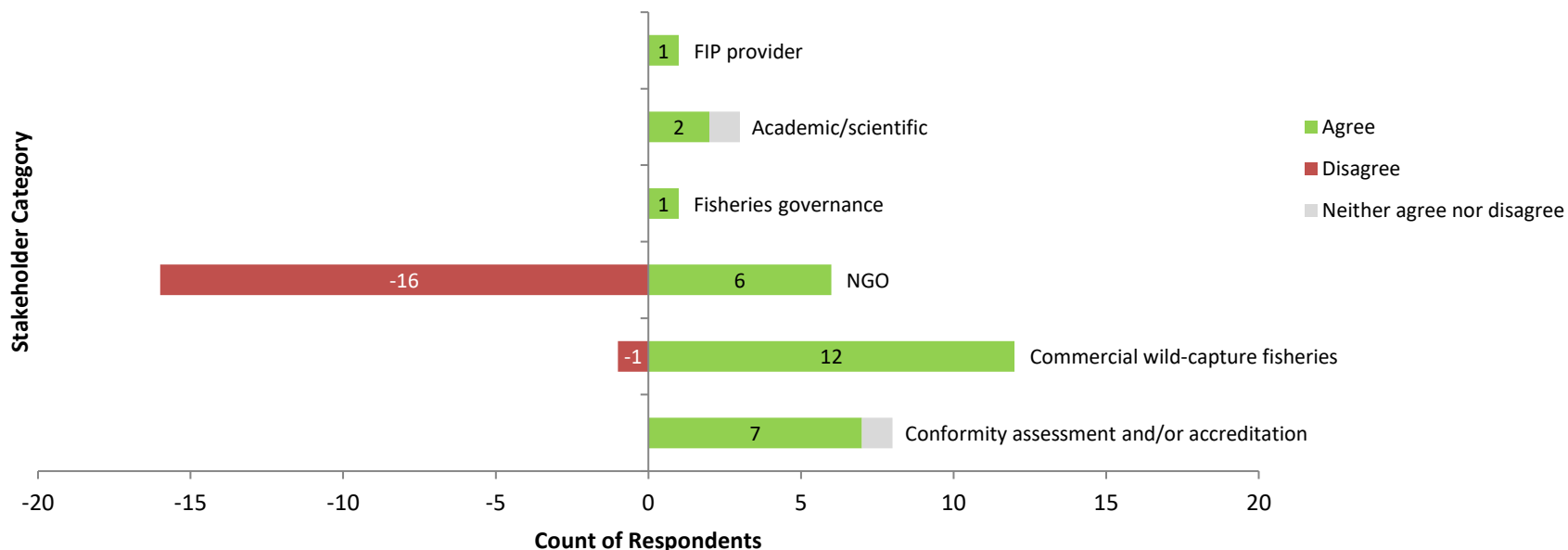
Thus, catch reporting alone is not sufficient to generate data to reliably support that negative impacts to P2 species are not occurring, and is similarly insufficient for assessors to determine the level of risk a fishery may pose to these species with confidence (e.g. at least some level of independent observer coverage is necessary to validate basic catch or logbook data). Other sources of information, such as dockside sampling or periodic scientific studies, are also likely insufficient to capture variability in catch composition, and are also subject to

		<p>bias that makes comparability difficult (e.g. dockside sampling will not capture discard information, and sampling/fishing activities to collect scientific data often differs operationally from “typical” fishing operations, is costly, and captures information from a specific point in time).</p>
<b>114935583787</b>	Non-governmental organisation	<p>This requirement should occur at SG60, not SG80.</p> <p>The definition of a "system in place" is too vague, and "independent verification" falls short of "independent observation." There need to be numerical thresholds supported by scientific evidence, such as &gt;20% to achieve SG80 and 50-100% to achieve SG100.</p> <p>Self-reported data should be required at SG60, not SG80. It is highly concerning that the MSC is considering awarding certification, even conditional, to fisheries with no systematic self-reporting or data verification via in-situ observation already in place. There are enough existing fishery management improvement frameworks, such as the MSC Improvement Program or Fisheries Improvement Projects (FIP), to ensure those basic management standards are implemented before certification is considered.</p>
<b>114935402174</b>	Non-governmental organisation	<p>The requirement should be implemented at SG60, not SG80, because the current definition of a “system in place” is vague and “independent verification” is weaker than true observation. Certification thresholds need clear, science-based numeric targets (e.g., &gt;20% for SG80, 50–100% for SG100). Self-reported data should also be mandatory at SG60. Allowing certification without systematic self-reporting and in-situ data verification is concerning. Existing fishery management frameworks (e.g., MSC Improvement Program, FIPs) can ensure these basic standards are met before certification.</p>
<b>114935537358</b>	Non-governmental organisation	<p>I believe that this requirement should occur at SG60, not SG80.</p> <p>The definition of a “system in place” is too vague and “independent verification” is a drawback from “independent observation”. It needs numerical thresholds that are supported by scientific evidence – e.g. &gt;20% to achieve SG80; 50-100% to achieve SG100.</p> <p>Self-reported data should be a requirement at SG60, not SG80. It is highly concerning that the MSC is contemplating awarding certification to fisheries –</p>

		<p>even with condition - with no systematic self-reporting and data verification (via in-situ observation) already in place.</p> <p>There are enough existing fishery's management improvement frameworks – such as the MSC Improvement Program, or Fisheries Improvement Projects (FIP) – to ensure that those basic fishery management standards are implemented before accessing potential certification.</p>
<b>114935463463</b>	Non-governmental organisation	<p>Independent verification is essential, but the proposal weakens best practice. In v3.0, independent observation was expected at lower scoring levels, whereas the new draft moves this requirement to SG80 and broadens “verification” to include alternatives such as shore-based checks, reference fleets, or at-sea research surveys. While such methods may provide useful supplementary data in specific contexts, they cannot replace in-situ observation of actual fishing events, which remains the most reliable way to detect bycatch of ETP/OOS species and interactions with habitats. Best practice requires observer or electronic monitoring at sea as the default form of verification, with alternative approaches accepted only if they can demonstrably deliver equivalent outcomes.</p>
<b>114935167081</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114935145363</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114934996080</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114934471709</b>	Non-governmental organisation	<p>The requirement should be at SG60, not SG80. The definition of a “system in place” is too vague and “independent verification” is a drawback from “independent observation”. It needs numerical thresholds that are supported by scientific evidence – e.g. &gt;20% to achieve SG80; 50-100% to achieve SG100. Self-reported data should be a requirement at SG60, not SG80. It is highly concerning that the MSC is contemplating awarding certification to fisheries – even with condition - with no systematic self-reporting and data verification (via in-situ observation) already in place. There are enough existing fishery's management improvement frameworks – such as the MSC Improvement Program, or Fisheries Improvement Projects (FIP) – to ensure that those basic fishery management standards are implemented before accessing potential certification.</p>
<b>114934041597</b>	Non-governmental organisation	<p>Independent verification is considerably weaker than independent observation. Independent observation should be a requirement at SG60, not at SG80.</p>

<b>114933972264</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114931893479</b>	Non-governmental organisation	ISSF considers the statement should apply also at the SG60 level and, for SG80, a minimum independent observation coverage should also be required for exempted fisheries (i.e., fisheries within EEZs and Pole and line, handline, and troll gears).
<b>114935727997</b>	Academic/scientific professional	see answer to Q30 above
<b>114936589418</b>	Fisheries governance	As an independent third party is needed, however, discussions are required to determine whether entities such as the fisheries cooperatives, this association (the Hokkaido Federation of Fisheries Cooperative Associations), or the Hokkaido Research Organization could be the independent third parties.
<b>114935339306</b>	FIP provider	I think it is fair that all self reported catch data be independently verified for SG80, as long as it's fit-for-puopose and proportionate to risk.

**"I support the proposal to require that fisheries have a catch reporting system in place to meet SG80."**



Feedback received		
Respondent ID	Stakeholder Category	Comments
114935854975	Conformity assessment and/or accreditation	Requiring reporting of retained and discarded catch seems reasonable.
114935220378	Conformity assessment and/or accreditation	Under the current v2.01 standard I believe fisheries need a catch reporting system at the SG60 level; hence my concerns about a lowering of the bar.
114931975029	Conformity assessment and/or accreditation	For SA3.11.2 a and b do the two sources here have to be separate? What is MSCs intent here? Is a. seen as logbook data ? or would observer data fulfil this requirement? If sp observer data is sufficient to fulfil both a and b offering some redundancy here. This requirement has no guidance in relation to 3.11.2a and may be could benefit from some.

<b>114936439716</b>	Commercial wild-capture fisheries	Considering more room for improvement, having a catch reporting system in place at SG80 level is too difficult and not feasible.
<b>114935985271</b>	Commercial wild-capture fisheries	We agree that fisheries should have a catch reporting system in place to meet SG80. We note that some small-boat Alaska fisheries that do not carry observers or operate under a consistent monitoring program may be affected by such a requirement, and we hope that assessors will consider innovative models for catch reporting for ETP/non-target species, such as a reference fleet and/or fishery-dependent data, as potentially sufficient for meeting this requirement.
<b>114935328811</b>	Commercial wild-capture fisheries	We agree with and support the comments of the Association of Sustainable Fisheries.
<b>114935030286</b>	Commercial wild-capture fisheries	We believe it is necessary for fisheries to have a catch reporting system in place to meet SG80 – we are unclear how a fishery can be scored properly without it.
<b>114930478442</b>	Commercial wild-capture fisheries	It is unclear what you consider as bycatch so at this stage I don't know.
<b>114936268484</b>	Non-governmental organisation	I think they should have this for SG60 - the 'what they are collecting' and the quality of what they are collecting should inform whether they reach a SG80
<b>114935742704</b>	Non-governmental organisation	This should be required at SG60, and the catch reporting requirements should go far beyond simply self-reporting. If necessary, the Standard could be tiered to require more rigorous catch reporting for larger-scale, high seas fisheries.
<b>114935713917</b>	Non-governmental organisation	The standard to achieve SG80 should be much higher than simply having some sort of self-reporting catch reporting system in place. This proposed change will remove the pressure on fisheries to develop robust reporting systems.
<b>114935680642</b>	Non-governmental organisation	<p>We believe that this requirement should occur at SG60, not SG80.</p> <p>Having a catch reporting system in place is not a definition of "Good practice" (SG80), but the bare "minimum standard"(SG60) of a properly managed fishery. We believe that if a fishery lacks this minimum management standard, it will need to implement it prior to applying and getting certified under the MSC Standard. There are enough existing fishery's management improvement frameworks – such as the MSC Improvement Program, or Fisheries Improvement Projects (FIP) – to ensure that those basic fishery management standards are implemented before accessing potential certification.</p> <p>This also goes against the perception of consumers of MSC products, who expect at the very least, minimum standard and good practices in MSC certified</p>

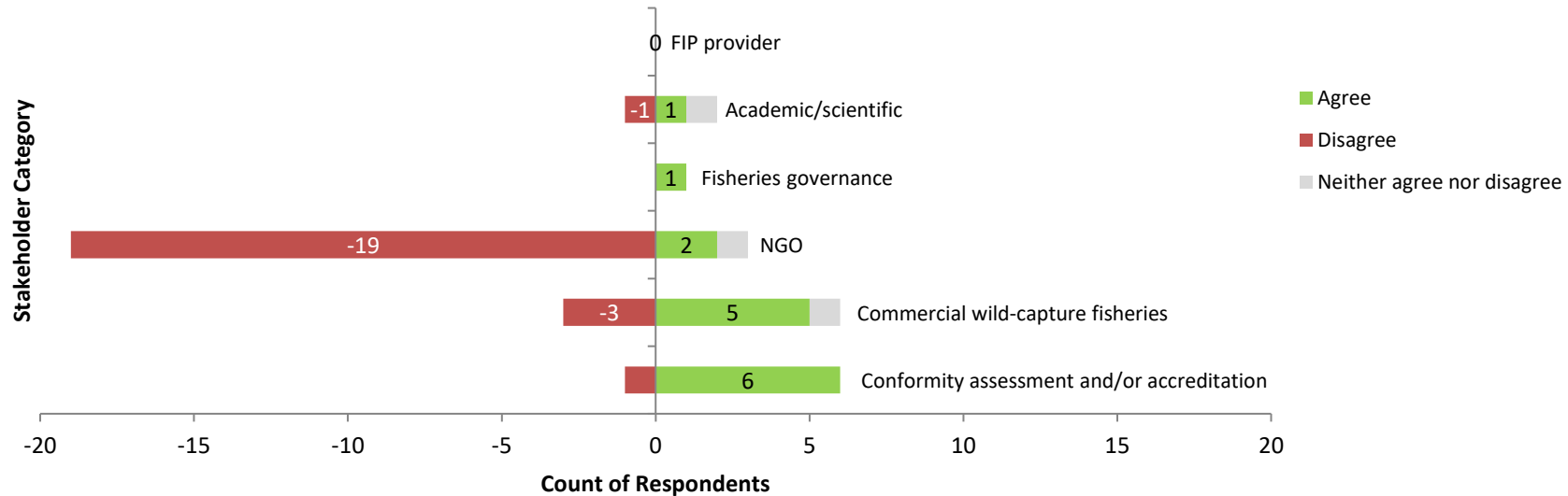
	fisheries, rather than rewarding those that are failing the most basic management practices.
<b>114935698418</b> Non-governmental organisation	<p>Stating that catch reporting is a “best practice” rather than a basic minimum required for environmental responsible fisheries flies counter to the MSC’s assertion that certified fisheries are minimizing impacts to other species and habitats. Stronger, more prescriptive monitoring is necessary and appropriate for all fisheries/vessels at both the SG60 and 80 levels. Revert to or reinforce the requirement for "independent observation" at SG60 for most fisheries, rather than the weaker "independent verification," at SG80 which allows for methods like less reliable shore-based checks instead of on-board observers or electronic monitoring. As proposed, there is no incentive through the MSC for fisheries to improve levels of independent data collection and verification.</p> <p>While it is true that appropriate levels of observer coverage vary by fishery and gear type, for reliable estimates of bycatch mortality, observer coverage is recommended to be at least 20% of fishing effort, 50% if the species is rare (Babcock et al. 2003). Additionally, studies have concluded that higher levels of independent observer coverage are appropriate when determining bycatch mortality “with confidence” (e.g. Diaz 2010). ETP and OOS species by nature of their smaller population sizes necessitate higher levels of fisheries data collection and validation to generate reliable estimates on interactions (typically above 20% observer coverage rates).</p> <p>Furthermore, fishers are incentivized to underreport or misreport bycatch, injury and mortality of non-target species, or simply may lack the knowledge necessary to correctly identify them (e.g. Burns and Kerr 2008; Faunce et al. 2015). For example, Basran and Sigurdsson (2021) found that in New Zealand, the United States, and Iceland – three countries generally considered data-rich and with effective fisheries management - cetacean bycatch recorded by observers was between 774% and 7,347% higher than logbook data. Fisheries managers treat as established fact that self-reported data have extremely high levels of uncertainty, with error levels often exceeding 100% (e.g. SAFMC “Review of Standardized Bycatch Reporting Methodology for the South Atlantic and Joint Fishery Management Plans”, 2022).</p>

		<p>Thus, catch reporting alone is not sufficient to generate data to reliably support that negative impacts to P2 species are not occurring, and is similarly insufficient for assessors to determine the level of risk a fishery may pose to these species with confidence (e.g. at least some level of independent observer coverage is necessary to validate basic catch or logbook data). Other sources of information, such as dockside sampling or periodic scientific studies, are also likely insufficient to capture variability in catch composition, and are also subject to bias that makes comparability difficult (e.g. dockside sampling will not capture discard information, and sampling/fishing activities to collect scientific data often differs operationally from “typical” fishing operations, is costly, and captures information from a specific point in time).</p>
<b>114935583787</b>	Non-governmental organisation	<p>This requirement should be at SG60, not SG80.</p> <p>A catch reporting system is the bare minimum standard (SG60) of a properly managed fishery, not a definition of "good practice" (SG80). If a fishery lacks this minimum management standard, we believe it must implement it before applying for certification under the MSC Standard. There are enough existing fishery management improvement frameworks, such as the MSC Improvement Program and Fisheries Improvement Projects (FIP), to ensure those basic management standards are met before certification is considered.</p> <p>This also aligns with consumers' expectations for MSC products, as they expect, at the very least, the minimum standard and good practices in MSC-certified fisheries rather than rewarding those that fail to meet basic management standards.</p>
<b>114935402174</b>	Non-governmental organisation	<p>Catch reporting should be required at SG60, as it represents a minimum management standard, not “good practice.” Fisheries lacking this must improve through existing programs (e.g., FIPs) before certification. Allowing certification without this undermines consumer trust, as MSC products are expected to meet at least basic management standards.</p>
<b>114935537358</b>	Non-governmental organisation	<p>I believe that this requirement should occur at SG60, not SG80.</p> <p>Having a catch reporting system in place is not a definition of “Good practice” (SG80), but the bare “minimum standard” (SG60) of a properly managed fishery. We believe that if a fishery lacks this minimum management standard, it will</p>

		<p>need to implement it prior to applying and getting certified under the MSC Standard. There are enough existing fishery’s management improvement frameworks – such as the MSC Improvement Program, or Fisheries Improvement Projects (FIP) – to ensure that those basic fishery management standards are implemented before accessing potential certification.</p> <p>This also goes against the perception of consumers of MSC products, who expect at the very least, minimum standard and good practices in MSC certified fisheries, rather than rewarding those that are failing the most basic management practices.</p>
<b>114935463463</b>	Non-governmental organisation	<p>114935463463 disagrees. While self-reporting is already common, robust independent verification is often resisted by fisheries citing cost or logistics. Experience shows that without clear minimum standards (e.g., observer or electronic monitoring coverage levels), many fisheries remain data-poor across successive certification cycles. By moving the independent verification requirement to SG80 and allowing vague alternatives such as dockside checks, the proposal creates loopholes rather than feasibility. Feasibility must be defined through proportionate, risk-based thresholds (e.g., higher coverage for high-risk fisheries, lower for genuinely low-risk), not by weakening expectations.</p>
<b>114935167081</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114935145363</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114934996080</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114934471709</b>	Non-governmental organisation	<p>The requirement should be at SG60, not SG80. Having a catch reporting system in place is not a definition of “Good practice” (SG80), but the bare “minimum standard” (SG60) of a properly managed fishery. We believe that if a fishery lacks this minimum management standard, it will need to implement it prior to applying and getting certified under the MSC Standard. There are enough existing fishery’s management improvement frameworks – such as the MSC Improvement Program, or Fisheries Improvement Projects (FIP) – to ensure that those basic fishery management standards are implemented before accessing potential certification. This also goes against the perception of consumers of MSC products, who expect at the very least, minimum standard and good</p>

		practices in MSC certified fisheries, rather than rewarding those that are failing the most basic management practices.
<b>114934041597</b>	Non-governmental organisation	A catch reporting system should be a bare minimum and assessed at SG60
<b>114933972264</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114931893479</b>	Non-governmental organisation	ISSF considers that the catch reporting system should meet some minimum requirements and be supported by independent observation, and it should apply also at the SG60 level.
<b>114935727997</b>	Academic/scientific professional	<p>Evidence should also be available for fishing effort indices, not solely catch. Such information is crucial to have as it enables determining hotspots of fishing activity and potential overlap of fisheries with sensitive area and ETP species. To that end, other than a sound catch collection framework, for estimating fishing effort is also important. This would require the use of AIS or other positioning systems that are easy to implement for larger size vessels. For smaller size vessels, using static nets such information is crucial, as i. catch information is aggregated, following fishing operation, and ii. monitoring involves gear deployment or collection but is not linked to actual soaking time.</p> <p>20% of catch events does not take into considerations high risk areas and important seasons for cetaceans and seabirds. Operations should be selected upon careful considerations, based on prior knowledge of the fishery (season, area, gear, etc.) and the ecology of the fishing area.</p>
<b>114935339306</b>	FIP provider	Requiring catch reporting paired with independent verification sets a clear baseline.

**"I support the proposal to require at least 20% observer or electronic monitoring coverage to meet SG80 for fisheries operating in areas beyond national jurisdiction, in addition to the default requirements to meet SG80."**



Feedback received		
Respondent ID	Stakeholder Category	Comments
114935854975	Conformity assessment and/or accreditation	However, we would like to see supportive reasoning behind that value given 30% is usually the accepted threshold for detecting rare events. Also, noting that the MSC needs to pay closer attention to how auditors are expected to incorporate EM data, given protocols for data collection and analysis are not yet fully implemented by fishery clients.
114934751228	Conformity assessment and/or accreditation	For longline vessels I suggest a definition of 20 percent observer or electronic monitoring coverage as 20 percent of hooks sampled, not sets. Sets vary widely in hooks per set and observers often subsample within sets, while logbooks report complete sets. Using hooks sampled matches the effort unit used for CPUE, keeps coverage proportional to true effort, reduces bias, and allows direct comparison with logbook data. This also makes it easier to calculate observer coverage rates.

<b>114926520123</b>	Conformity assessment and/or accreditation	20% feels like a reasonable compromise for these fisheries.
<b>114931975029</b>	Conformity assessment and/or accreditation	In regard to the exceptions on SA3.11.3 for pole and line, troll or handline gear I do not agree with this exception. There is adequate evidence do suggest that these gears can and do catch sharks (particularly troll), seabirds (see South African pole and line certifications). The argument for not having observers onboard on these vessels is always related to reduced fishing effort (one observer berth = one less crew catching) however with EM available this is no longer a valid argument. There is no reason to except these fisheries from independent observation requirements. Further these fisheries without observers etc may well struggle to reach the new requirement of SA3.11.2.b without observers / EM.
<b>114905584606</b>	Conformity assessment and/or accreditation	I agree based on the exception for some gears, which I condiseder quite unfeasible to reach that coverage percentage, actually it was the biggest concerned of most of our clients facing the new version (I guess because it it for them a very straight forward to understand requirement and with obvious monetary repercussions)
<b>114936603760</b>	Commercial wild-capture fisheries	The crews don't feel comfortable the deployment of EM.
<b>114936439716</b>	Commercial wild-capture fisheries	It is difficult to arrange observers on board.  Regarding EM, it is not easy to deploy due to the high initial and ongoing costs (maintenance and analysis), which are disproportionate to the scale of fishery sales. In such a situation, it is difficult to meet 20% coverage.
<b>114935985271</b>	Commercial wild-capture fisheries	We agree with ASF's feedback: "Here, the ASF believes further clarification is required; it is not clear if the 20% rule would apply to fisheries that normally or only occasionally operate in international waters. In this, we note that most ASF client fisheries would normally operate inside national waters, but some may occasionally operate outside during a trip. In such cases, would an overall rate of 20% coverage be required, or if a fleet had a lower average level of coverage would it only be possible for a vessel to cross into international waters if there was an observer on board?  More generally, we believe the issue of concern is likely to be somewhat fishery-specific (vessels operating for extended periods in international waters or across jurisdictions that return to port infrequently or even rarely) rather than being

		generic across MSC fisheries. If this is the case, this would be an area where the ASF would strongly support a more selective approach to requirement setting."
<b>114934071628</b>	Commercial wild-capture fisheries	In ICCAT EM minimum standard, data review is the responsibility of the CPC government. However in some countries that leaves the risk that government employs their preferred analysis organization that may be arbitral in the data analysis, limiting transparency. Is this still considered acceptable for MSC as 3rd party data? It may depend on assessment expert's judgement but some experts just don't understand the system well. Public comment without prior registration is not allowed at MSC process, therefore there are risks of erroneous assessment not having opportunity to be corrected.
<b>114908281254</b>	Commercial wild-capture fisheries	Longline fisheries are expected to be adjusted to 10% or less.
<b>114935328811</b>	Commercial wild-capture fisheries	We agree with and support the comments of the Association of Sustainable Fisheries.
<b>114935030286</b>	Commercial wild-capture fisheries	<p>Here, the ASF believes further clarification is required; it is not clear if the 20% rule would apply to fisheries that normally or only occasionally operate in international waters. In this, we note that most ASF client fisheries would normally operate inside national waters, but some at least may occasionally operate outside during a trip. In such cases, would an overall rate of 20% coverage be required, or if a fleet had a lower average level of coverage would it only be possible for a vessel to cross into international waters if there was an observer on board?</p> <p>More generally, we believe the issue of concern is likely to be somewhat fishery-specific (vessels operating for extended periods in international waters or across jurisdictions that return to port infrequently or rarely) rather than being generic across MSC fisheries. If this is the case, this would be an area where the ASF would strongly support a more selective approach to requirement setting.</p>
<b>114934899083</b>	Commercial wild-capture fisheries	The definition of "electronic monitoring" as "cameras" is problematic. Norway has a ERS system that is quite comprehensive, but without cameras. Our fleet can occasionally operate in international waters (such as Barents Sea prawns).
<b>114930478442</b>	Commercial wild-capture fisheries	At the roundtable I heard that the number of observers available is limited. In that sense, it sounds like an impossible ask.
<b>114936268484</b>	Non-governmental organisation	I think keeping this at 30% is important. OR, perhaps alternatively, add that in addition to the 20% observer coverage, they also have 90% AIS coverage.

		<p>In our work we have found many tuna vessels with lower than 20% AIS coverage, which is a problem. Other fleets have ~90%. Making sure any vessel/fleet associated with MSC certification has high AIS, while they build on their observer/em program, should be a priority.</p> <p>I know there are operational and financial difficulties in reaching 30%. And while I haven't had a chance to read the MRAG paper, the market signals these companies are getting are for 100% observer coverage. I think lowering this will water down the effort that top companies/fisheries have made—where this is a core area for them to get points, results in third-party data, strengthens the ERF process, and overall improves management.</p>
<b>114936142847</b>	Non-governmental organisation	I think jiggers should also be excluded
<b>114935742704</b>	Non-governmental organisation	<p>In reducing the observer coverage requirement from 30 percent to 20 percent, MSC has aligned with what it describes as "widely accepted as a practical minimum" and a "credible baseline." As such, there is no reason why the 20 percent observer coverage shouldn't be required by all fisheries to meet SG60. It also creates next to no incentive for fisheries to work towards improving their observer coverage/monitoring standards.</p> <p>As a broader concern, if the MSC takes a significant step backwards in observer coverage to align with industrial norms, then the value of the MSC certification as a "gold standard" to consumers becomes entirely diminished. The status quo of fishing is generally unsustainable. The role of the MSC is to direct consumers towards more sustainable options. This proposed change does entirely the opposite.</p>
<b>114935713917</b>	Non-governmental organisation	We are very disappointed in the MSC for reducing this from 30% to 20%. 20% is a minimum level for fisheries that interact with common bycatch species. A 20% monitoring system is not sufficient for those fisheries that interact with rare species. This is a significant step backwards from V3.1. We do not support this change.
<b>114935680642</b>	Non-governmental organisation	<p>We disagree with the proposed change that lowers the specific requirements for RFMOs/High Seas fisheries, which represents a reduction from the previous requirement that was set at "30% independent observation" to reach SG80.</p> <p>The proposed blanket exception for pole-and-line, troll, or handline gear on the</p>

high seas is also problematic. While we understand and generally agree that those gears are generally less problematic/risk to ETP/OOS bycatch, and as such are an improvement compared to Longline gear for example, this creates the risk of never uncovering some conservation issues (e.g. confirmation bias).

We are also extremely concerned with the number of exemptions that could benefit high seas/RFMO fisheries – besides the pole-and-line & similar gears - “Where there is a lower level of independent observation that is”: (i) Designed to achieve a specified level of precision in catch estimates for the ETP/OOS species scoring element; (ii) Representative of the UoA’s fishing operations; (iii) Implemented by the RFMO as a binding measure; and (iv) Supported by analysis that is publicly available. In effect, this could mean that the proposed “20% monitoring in high-seas fisheries” could in fact be much lower in practice. There should be no exemptions for lower levels of monitoring coverage in RFMO fisheries (particularly for those that are not pole-and-line, troll or handline gear).

We finally note that the wording has slightly changed under the proposed changes; from “The team may recognise a lower level of independent observation as being adequate [...]” to “Where there is a lower level of independent observation [...]”. This change is unnecessary and worrying, as it further weakens the Standard and monitoring needs.

**114935698418** Non-governmental organisation

Maintain or increase the independent observation requirement for RFMO/High Seas fisheries back to 30%, rather than reducing it to "at least 20%". Additionally, if 20% independent observation is considered a credible scientific baseline for bycatch monitoring in RFMO fisheries, it should be mandated for all MSC fisheries to achieve SG80. Incorporate scientifically suggested minimum coverage levels for monitoring (e.g.,  $\geq 5\%$  as absolute minimum (SG60),  $\geq 20\%$  for frequently caught species (SG80) and  $\geq 50\%$  for infrequently caught species) as Scoring Guideposts for industrial fisheries. Create stronger incentives for fisheries to improve monitoring coverage and increase transparency.

While it is true that appropriate levels of observer coverage vary by fishery and gear type, for reliable estimates of bycatch mortality, observer coverage is recommended to be at least 20% of fishing effort, 50% if the species is rare (Babcock et al. 2003). Additionally, studies have concluded that higher levels of

	<p>independent observer coverage are appropriate when determining bycatch mortality “with confidence” (e.g. Diaz 2010). ETP and OOS species by nature of their smaller population sizes necessitate higher levels of fisheries data collection and validation to generate reliable estimates on interactions (typically above 20% observer coverage rates). Rapid advances in EM utility and accessibility make it feasible for these types of fisheries to increase their level of observer/EM coverage to gain or maintain an MSC certification within the next 5-10 years.</p> <p>To recognize that certain fisheries may be able to generate statistically reliable estimates of bycatch/rare species catch with lower rates of independent observation (in person/EM), a more appropriate phrasing may be that the level of independently monitored data must be sufficient to quantitatively demonstrate a similar level of statistical confidence as 20-50% independent observer coverage.</p>
<p><b>114935583787</b>      Non-governmental organisation</p>	<p>This change represents a reduction from the previous requirement of "30% independent observation" to reach SG80.</p> <p>The proposed blanket exception for pole-and-line, troll, and handline gear on the high seas is also problematic. While we understand and generally agree that these gears pose less risk of ETP/OOS bycatch than longline gear, for example, this creates the risk of never uncovering some conservation issues (e.g., confirmation bias).</p> <p>I am also extremely concerned about the number of exemptions that could benefit high seas/RFMO fisheries besides pole-and-line and similar gears, such as: (i) designed to achieve a specified level of precision in catch estimates for the ETP/OOS species scoring element, (ii) representative of the UoA's fishing operations, (iii) implemented by the RFMO as a binding measure, and (iv) supported by publicly available analysis. In effect, the proposed "20% monitoring in high seas fisheries" could be much lower in practice. There should be no exemptions for lower levels of monitoring coverage in RFMO fisheries, particularly for fisheries that do not use pole-and-line, troll, or handline gear.</p> <p>Finally, I note that the wording has changed slightly under the proposed changes, from "The team may recognize a lower level of independent observation as adequate [...]" to "Where there is a lower level of independent observation [...]".</p>

		<p>This change is unnecessary and worrisome because it further weakens the standard and monitoring needs.</p>
<p><b>114935402174</b></p>	<p>Non-governmental organisation</p>	<p>Lowering requirements for RFMOs/high seas fisheries, which would reduce SG80 independent observation from 30%. The proposed exceptions for pole-and-line, troll, or handline gear are risky, as they could overlook conservation issues. Additional exemptions for lower observation levels, even if justified by precision, representativeness, RFMO measures, or public analysis, could effectively reduce monitoring below 20% in practice. No exemptions should apply to non-pole-and-line high-seas fisheries. The slight wording change further weakens the Standard and monitoring requirements.</p>
<p><b>114935537358</b></p>	<p>Non-governmental organisation</p>	<p>I disagree with the proposed change that lowers the specific requirements for RFMOs/High Seas fisheries, which represents a reduction from the previous requirement that was set at “30% independent observation” to reach SG80.</p> <p>The proposed blanket exception for pole-and-line, troll, or handline gear on the high seas is also problematic. While we understand and generally agree that those gears are generally less problematic/risk to ETP/OOS bycatch, and as such are an improvement compared to Longline gear for example, this creates the risk of never uncovering some conservation issues (e.g. confirmation bias).</p> <p>We are also extremely concerns with the number of exemptions that could benefit high sea’s/RFMO fisheries – besides the pole-and-line &amp; similar gears - “Where there is a lower level of independent observation that is”: (i) Designed to achieve a specified level of precision in catch estimates for the ETP/OOS species scoring element; (ii) Representative of the UoA’s fishing operations; (iii) Implemented by the RFMO as a binding measure; and (iv) Supported by analysis that is publicly available. In effect, this could mean that the proposed “20% monitoring in high-seas fisheries” could in fact be much lower in practice. There should be no exemptions for lower levels of monitoring coverage in RFMO fisheries (particularly for those that are not pole-and-line, troll or handline gear).</p> <p>We finally note that the wording has slightly changed under the proposed changes; from “The team may recognise a lower level of independent observation as being adequate [...]” to “Where there is a lower level of</p>

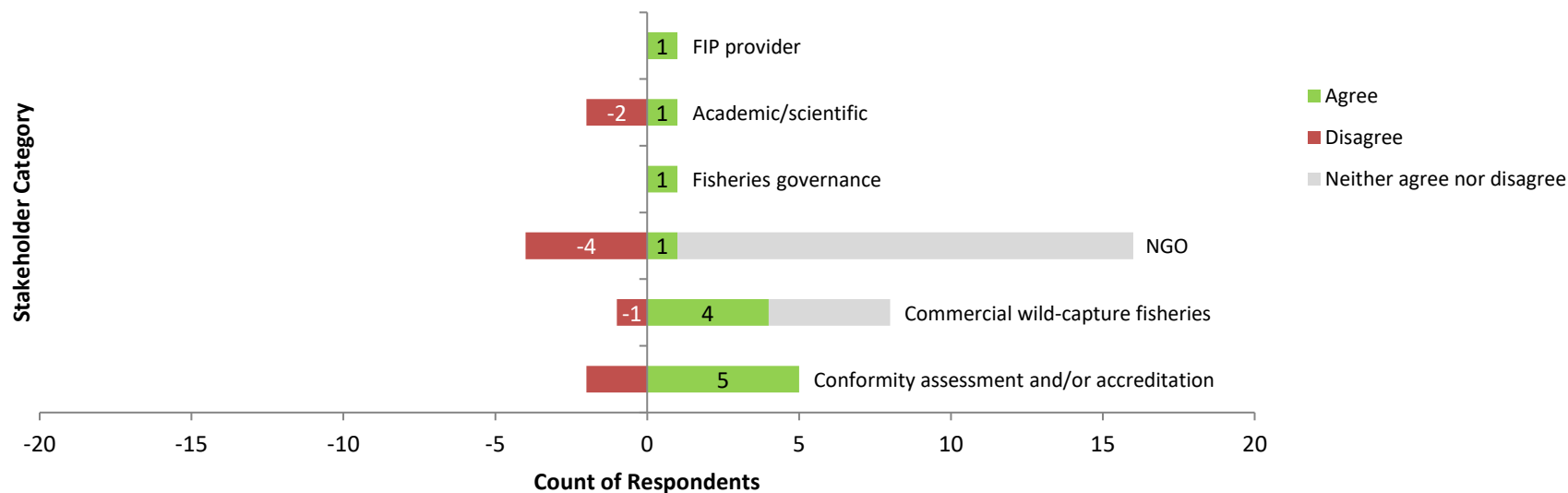
		independent observation [...]”. This change is unnecessary and worrying, as it further weakens the Standard and monitoring needs.
<b>114935463463</b>	Non-governmental organisation	114935463463 considers the reduction from the current 30% requirement to 20% a clear weakening of the Standard. Evidence shows that even 30% coverage is often insufficient to reliably detect interactions with rare ETP/OOS species, and that higher levels (50–100%) may be necessary in many contexts. The introduction of exemptions for pole-and-line, troll, and handline fisheries further undermines consistency, as these gears can also have bycatch risks. The MSC rationale of “practicality” and “alignment with RFMO norms” does not justify lowering expectations; instead, MSC should maintain the 30% baseline and apply higher coverage where impact risk is high.
<b>114935201693</b>	Non-governmental organisation	<p>We agree with the requirement for a minimum independent observation coverage, but for some scenarios, such as interactions with rarely encountered species, based on the studies cited in the MRAG UK report, we do not believe that 20% coverage is sufficient for the CABs to estimate the impact of the UoA and urge strong MSC oversight on the rationales used by the CABs for this scoring element.</p> <p>Additionally, we suggest that the guidance in GSA3.11.3 should be revised to specifically require the consideration of only “review rate” when determining the level of independent observation satisfied by electronic monitoring. Allowing CABs to consider coverage rate (the percentage of vessels with EM onboard, or the percentage of effort that was recorded but not analyzed) would allow situations where fishing effort was recorded but never analyzed or submitted to fishing authorities, which would not satisfy the intent of the requirement for independent observation. It would be like counting a sleeping human observer who never left their bunk towards the observer coverage level.</p> <p>GSA3.11.3 should also be revised to remove the reference to MSC’s intent to improve precision of catch estimates, as precision is no longer included in the ERF. The MSC should also reconsider if consideration of “precision” by the RFMOs is the right metric when determining if an alternative requirement should be recognized.</p> <p>Finally, GSA3.11.3 should be revised to be more explicit on which time periods</p>

		should be analyzed to calculate independent observation rates. Recent assessments of RFMO fisheries have demonstrated large inconsistencies on how CABs calculate observation rates, often picking the year(s) that show the highest rate, even if those aren't the same years used to evaluate catch of the UoA.
<b>114935167081</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114935145363</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114934996080</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114934471709</b>	Non-governmental organisation	<p>I strongly disagree with the proposed change that lowers the specific requirements for RFMOs/High Seas fisheries, which represents a reduction from the previous requirement of "30% independent observation" to reach SG80. The proposed blanket exception for pole-and-line, troll, or handline gear on the high seas is also very problematic. While these gears are typically less problematic or pose less risk to ETP/OOS bycatch, and thus are an improvement compared to, for instance, Longline gear, this exception risks obscuring certain conservation issues due to confirmation bias.</p> <p>I am seriously concerned regarding the number of exemptions that could benefit high seas/RFMO fisheries, beyond just pole-and-line and similar gears. These exemptions apply "Where there is a lower level of independent observation that is":</p> <ul style="list-style-type: none"> <li>(i) Designed to achieve a specified level of precision in catch estimates for the ETP/OOS species scoring element;</li> <li>(ii) Representative of the UoA's fishing operations;</li> <li>(iii) Implemented by the RFMO as a binding measure; and</li> <li>(iv) Supported by analysis that is publicly available.</li> </ul> <p>This effectively means that the proposed "20% monitoring in high-seas fisheries" could be considerably lower in practice. There should be no exemptions for lower levels of monitoring coverage in RFMO fisheries, particularly for those not using pole-and-line, troll, or handline gear. Finally, the wording has subtly changed under the proposed revisions, from "The team may recognise a lower level of independent observation as being adequate [...]" to "Where there is a lower level</p>

		of independent observation [...]". This alteration is unnecessary and worrying, as it further weakens the Standard and undermines monitoring requirements
<b>114921832004</b>	Non-governmental organisation	Monitoring systems, whether via human observers or electronic systems, are key to compliance onboard fishing vessels. At 20% coverage, this means that 80% of fishing effort is unobserved, which is a massive blind spot. We urge MSC to at a minimum, add language that clearly signals that higher coverage (e.g. 50–100%) is encouraged and will be required over time for statistically reliable estimates and to capture variation in behavior between vessels. Given the growing availability of electronic monitoring, higher thresholds are not only possible, they are necessary to ensure credibility.
<b>114934041597</b>	Non-governmental organisation	20% requirement is a unwelcomed step down from the former 30% requirement. In addition, there now appears to be several exemptions included which are completely unacceptable for High Seas fisheries - especially a lower level of observation if implemented as a binding measure in RFMOs. There should be *no exemptions* for lower levels of monitoring coverage in RFMO fisheries.
<b>114933972264</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114931893479</b>	Non-governmental organisation	ISSF agrees that a level of at least 20% observer or electronic monitoring coverage should be required to meet SG80. This is backed by several studies as the minimum level needed to get an understanding of a fishery's encounters with in-scope and ETP/OOS common species (Lennert-Cody, 2001; Babcock et al., 2003; Sánchez et al., 2007; Amandè et al., 2012). Note, however, that in the case of rare species, a higher level would be needed, of at least 50% (Babcock et al., 2003). References: Amandè, M. J., Chassot, E., Chavance, P., Murua, H., de Molina, A. D., and Bez, N. (2012). Precision in bycatch estimates: the case of tuna purse-seine fisheries in the Indian Ocean. <i>ICES Journal of Marine Science</i> , 69: 1501-1510. Babcock, E. A., Pikitch, E. K., and Hudson, C. G. (2003). How much observer coverage is enough to adequately estimate by-catch. Report of the Pew Institute for Ocean Science, Rosentiel School of Marine and Atmospheric Science, University of Miami, Miami, FL. Lennert-Cody, C. (2001). Effects of sample size on bycatch estimation using systematic sampling and spatial post-stratification: summary of preliminary results. In IOTC proceedings, pp. 48-53. Sánchez, S., Murua, H., González, I., and Ruiz, J. (2007). Optimum sample

		number for estimating shark by-catch in the Spanish purse seiners in the Western Indian Ocean. IOTC-2007-WPTT-26, 6pp.
114925202249	Non-governmental organisation	Monitoring systems, whether via human observers or electronic systems, are key to compliance onboard fishing vessels. At 20% coverage, this means that 80% of fishing effort is unobserved, which is a massive blind spot. We urge MSC to at a minimum, add language that clearly signals that higher coverage (e.g. 50–100%) is encouraged and will be required over time for statistically reliable estimates and to capture variation in behavior between vessels. Given the growing availability of electronic monitoring, higher thresholds are not only possible, they are necessary to ensure credibility.
114899462711	Non-governmental organisation	I agree with 20% observation of catches brought onboard, so as to estimate bycatch species and any mortality related to ETP/OOS species. However, a special case is the estimation of bird strikes on cables during towing, where reaching 20% is very difficult, given multiple activities conducted by observers. Use of Electronic Monitoring for this task is still in early stages of developing.
114935727997	Academic/scientific professional	Proposed 20% coverage is extremely low, when considering that: i. high seas fisheries large-scale industrialized, ii. Taking place in especially sensitive area, where management is in many cases currently lacking. iii. Evidence to suggest that absence of enforcement and control with unregulated fishing activity taking place in remote MPAs areas (Seguin et al., 2025 Global patterns and drivers of untracked industrial fishing in coastal marine protected areas).  -30% coverage should be reinstated, and for large-scale, industrial fisheries fleet segment is a common management practice for observers, and it should be higher for a fishery considered sustainable and seeking certification.

**"It is fair to exclude pole and line, handline and troll gear type fisheries from the requirement for 20% observer or electronic monitoring coverage, noting they still must meet the scoring guideposts required of every other non-high-seas fishery."**



Feedback received		
Respondent ID	Stakeholder Category	Comments
114931975029	Conformity assessment and/or accreditation	see statement above
114926778971	Conformity assessment and/or accreditation	trolling and the "line" component of pole and line fisheries pose high risk to seabirds
114936603760	Commercial wild-capture fisheries	Basically, it is preferable to have no exceptions, but it may be acceptable if the nature of the gear types is taken into consideration.
114936439716	Commercial wild-capture fisheries	It should be depended on species, but as long as migratory fish is a straddling stock, the judgement should be made on a case-by-case basis.
114935328811	Commercial wild-capture fisheries	We agree with and support the comments of the Association of Sustainable Fisheries.
114935030286	Commercial wild-capture fisheries	The ASF has very few members with P&L, handline or troll fisheries of the type envisaged, here (i.e., those targeting tuna or other HMS species in international waters). We generally support a scale/intensity (risk) based approach, and do consider that these fisheries are likely to be low risk, but believe it would still be

		appropriate to have some level of independent verification of catch for ETP species in these fisheries – a complete absence of information or reliance on historical data alone should not be sufficient to meet SG80. We suggest that some data (scientific studies, observer data, EM data should be required, at a nominal level of 2-5% minimum.
<b>114930478442</b>	Commercial wild-capture fisheries	Observers are limited, and it is not common practice for near-shore fisheries to bring in someone external to join fishing trips.
<b>114930258485</b>	Commercial wild-capture fisheries	All fisheries should be subject to the same requirements in order to ensure fair assessment. MSC certification aims to help fisheries improve. If there are no requirements for independent monitoring for these fisheries, how can they be helped to implement it?
<b>114936268484</b>	Non-governmental organisation	In the absence of observer requirements, some specific requirements around vessel monitoring should be added for these fisheries. If needed, vessel size should be included to help clarify who should be excluded.
<b>114936142847</b>	Non-governmental organisation	I would include jiggers
<b>114935742704</b>	Non-governmental organisation	I don't know the answer to this specific question as I'm not familiar with this fishery, however, having different requirements for small-scale fisheries vs. large-scale high-seas fisheries may be of benefit, but only if the requirements for larger-scale fisheries are strengthened not weakened.
<b>114935680642</b>	Non-governmental organisation	<p>While we could support a lower requirement for those gears based on scientific evidence demonstrating they are lower risk to ETP/OOS species, we do not believe they should be exempted to the monitoring requirement for all fisheries operating in the high seas.</p> <p>We fear that this new exemption is creating a non-playing field for fisheries, and risk of never uncovering some conservation issues due to overall lack of monitoring requirements (e.g. confirmation bias).</p> <p>On that note, we think that:</p> <ul style="list-style-type: none"> <li>- Fisheries operating in the high seas should return to a minimum 30% monitoring coverage to reach SG80, instead of the weaker 20%.</li> <li>- Pole and line, handline and troll gear type fisheries operating in the High-Seas could benefit from a lower rate – e.g. 15% or 20% to achieve SG80 - but a blanket exemption is concerning.</li> </ul>

- All fisheries, irrespective of fishing in the high seas or not, should have a minimum monitoring threshold in place to reach SG80; 20% being the scientifically advice rate by multiple studies.

If 20% observer coverage represents a credible baseline which aligns with scientific recommendations for RFMO/High-Sea's fisheries, as described by MSC, we question why this threshold is not mandated for all MSC fisheries to reach SG80?

The value of the MSC Fisheries Standard and Certification is to be the global "gold standard" for fisheries management and environmental credentials. By aligning its "best practice" with minimum fisheries management requirements, such as those set by RFMOs, this questions the added value of the MSC certification to improve ocean governance and sustainability of the marine ecosystem. From a consumer standpoint, one could also argue of the relevance of buying MSC products if its sustainability standards are aligning with everything else on the shelves.

**114935698418** Non-governmental organisation

Maintain or increase the independent observation requirement for RFMO/High Seas fisheries back to 30%, rather than reducing it to "at least 20%". Additionally, if 20% independent observation is considered a credible scientific baseline for bycatch monitoring in RFMO fisheries, it should be mandated for all MSC fisheries to achieve SG80.

While pole and line, handline, and troll gear types are unlikely to have large amounts of bycatch in terms of landed catch, observer or EM coverage in these fisheries is incredibly beneficial in terms of documenting and ensuring that non-target species, particularly species of sea turtles, sharks and seabirds, as well as juvenile target fish (e.g. tuna) that may be caught are correctly identified and documented, and that appropriate handling and release practices are being used in order to minimize injury and/or post-release mortality. Noting that in many cases, vessels that utilize these types of fishing methods are too small to carry human observers, rapid advances in EM utility and accessibility make it feasible for these types of fisheries to increase their level of observer/EM coverage to gain or maintain an MSC certification within the next 5-10 years.

	<p>To recognize that certain fisheries may be able to generate statistically reliable estimates of bycatch/rare species catch with lower rates of independent observation (in person/EM), a more appropriate phrasing may be that the level of independently monitored data must be sufficient to quantitatively demonstrate a similar level of statistical confidence as 20-50% independent observer coverage.</p>
<p><b>114935583787</b> Non-governmental organisation</p>	<p>I could support a lower requirement for certain types of gear if scientific evidence demonstrated that they pose a lower risk to ETP/OOS species. However, I do not believe that they should be exempt from the monitoring requirement for all fisheries operating in the high seas.</p> <p>I fear this new exemption creates an uneven playing field for fisheries and increases the risk of failing to uncover some conservation issues due to an overall lack of monitoring requirements (e.g., confirmation bias).</p> <p>On that note, I believe that:</p> <ul style="list-style-type: none"> <li>- Fisheries operating in the high seas should return to a minimum of 30% monitoring coverage to reach SG80 instead of the weaker 20%.</li> <li>- Pole-and-line, handline, and troll fisheries operating in the high seas could benefit from a lower monitoring coverage rate, e.g., 15% or 20%, to reach SG80. However, a blanket exemption is concerning.</li> <li>- All fisheries should have a minimum monitoring threshold in place to reach SG80. Twenty percent is the rate advised by multiple studies.</li> </ul> <p>If 20% observer coverage represents a credible baseline that aligns with scientific recommendations for RFMOs and high seas fisheries, as described by the MSC, then why is this threshold not mandated for all MSC fisheries to reach SG80?</p> <p>The MSC Fisheries Standard and Certification aims to be the global "gold standard" for fisheries management and environmental credentials. However, by aligning its "best practices" with minimum fisheries management requirements, such as those set by RFMOs, the added value of MSC certification to improve ocean governance and the sustainability of marine ecosystems is called into question. From a consumer standpoint, one could also question the relevance of buying MSC products if their sustainability standards align with those of other products.</p>

<b>114935402174</b>	Non-governmental organisation	<p>While lower-risk gears (pole-and-line, handline, troll) could have reduced monitoring based on science, they should not be fully exempt on the high seas. The new exemption risks uneven standards and missed conservation issues. High-seas fisheries should maintain a minimum 30% monitoring to reach SG80, with lower-risk gears allowed slightly reduced rates (15–20%) but not full exemption. All fisheries should have a minimum monitoring threshold, consistent with scientific recommendations. If 20% coverage is credible for high-seas fisheries, it should be required universally. Aligning MSC standards with minimum RFMO requirements risks undermining the value of MSC certification and its credibility in ocean sustainability.</p>
<b>114935537358</b>	Non-governmental organisation	<p>While I could support a lower requirement for those gears based on scientific evidence demonstrating they are lower risk to ETP/OOS species, I do not believe they should be exempted to the monitoring requirement for all fisheries operating in the high seas.</p> <p>We fear that this new exemption is creating a non-playing field for fisheries, and risk of never uncovering some conservation issues due to overall lack of monitoring requirements (e.g. confirmation bias).</p> <p>On that note, I think that:</p> <ul style="list-style-type: none"> <li>- Fisheries operating in the high seas should return to a minimum 30% monitoring coverage to reach SG80, instead of the weaker 20%.</li> <li>- Pole and line, handline and troll gear type fisheries operating in the High-Seas could benefit from a lower rate – e.g. 15% or 20% to achieve SG80 - but a blanket exemption is concerning.</li> <li>- All fisheries, irrespective of fishing in the high seas or not, should have a minimum monitoring threshold in place to reach SG80; 20% being the scientifically advice rate by multiple studies.</li> </ul> <p>If 20% observer coverage represents a credible baseline which aligns with scientific recommendations for RFMO/High-Sea’s fisheries, as described by MSC, we question why this threshold is not mandated for all MSC fisheries to reach SG80?</p> <p>The value of the MSC Fisheries Standard and Certification is to be the global “gold standard” for fisheries management and environmental credentials. By</p>

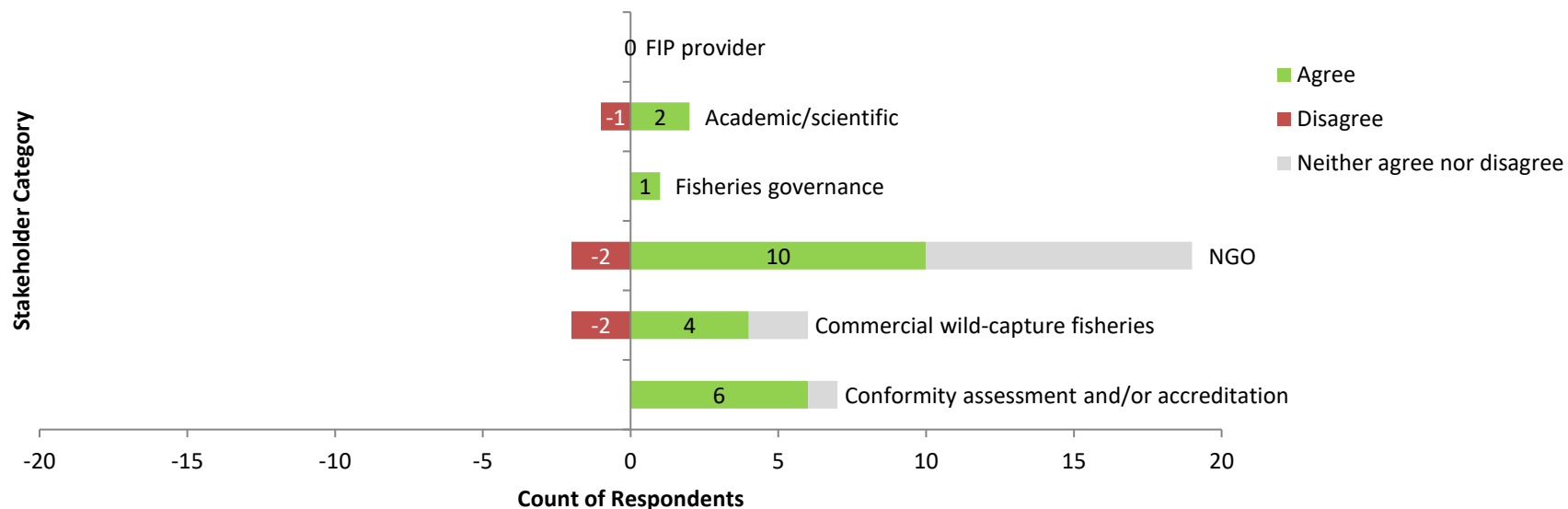
		aligning its “best practice” with minimum fisheries management requirements, such as those set by RFMOs, this questions the added value of the MSC certification to improve ocean governance and sustainability of the marine ecosystem. From a consumer standpoint, one could also argue of the relevance of buying MSC products if its sustainability standards are aligning with everything else on the shelves.
<b>114935463463</b>	Non-governmental organisation	The Standard should provide sufficient clarity regarding the exclusion of artisanal fisheries using these gears. This exclusion should be stated explicitly. Overall, while recognising the challenges faced by some smaller-in-scale fleets, at least some form of independent verification is still essential, noting too that electronic forms of observership will likely become more cost-effective in the future. At the very least, this could take the form of a risk-based monitoring framework to provide independent verification where : fisheries with demonstrably low risk could qualify for proportionate coverage levels. Certain standards must be maintained, however. For example, at SG80 there needs to be a system in place that facilitates the independent verification of catch data, e.g. at-sea inspections by management agencies; dockside monitoring; cross-referencing with sales notes; reference fleets; on-board observers; electronic monitoring systems using cameras. In MSC 3.0, the CAB would use the ERF tool to analyse if this independent verification leads to a high degree of accuracy in the estimate of impact. Now in MSC 3.1, the CAB can use their expert judgement to decide if "Information is adequate to estimate" In certain exceptional circumstances, some fisheries using this gear yet still considered as artisanal may operate in the high seas (e.g. some artisanal fisheries in Latin America) and therefore artisanal-fisheries specific only provisions might need to be made in such unique circumstances, incorporating the advice above and with explicit guardrails in place to ensure such provisions are not misappropriated by other non-artisanal fleets as a loophole to avoid observer measures.
<b>114935201693</b>	Non-governmental organisation	We disagree with the automatic exclusion – the impacts of individual UoAs on main, ETP, and OOS should be evaluated and they should only be excluded if there’s verifiable evidence of a low risk of negative interaction and impact on those species.
<b>114935167081</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114935145363</b>	Non-governmental organisation	Duplicate of 114935680642

<b>114934996080</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114934471709</b>	Non-governmental organisation	While the proposed gear types may have a lower risk to ETP/OOS species, they should not be entirely exempted from monitoring requirements for any fisheries operating in the high seas. Such exemptions could create an uneven playing field for fisheries and might prevent the discovery of conservation issues due to a general lack of monitoring, potentially leading to confirmation bias. All fisheries operating in the high seas should revert to a minimum of 30% monitoring coverage to achieve SG80, an increase from the current weaker 20% threshold. Multiple studies scientifically advise a minimum of 20% observer coverage, therefore I question why this 20% threshold, described by MSC as a credible baseline aligning with scientific recommendations for RFMO/High-Seas fisheries, is not mandated for all MSC fisheries to achieve SG80? The value of the MSC Fisheries Standard and Certification lies in its reputation as the global "gold standard" for fisheries management and environmental credentials. By aligning its "best practice" with minimum fisheries management requirements, such as those set by Regional Fisheries Management Organisations (RFMOs), the added value of MSC certification in improving ocean governance and the sustainability of the marine ecosystem is brought into question. From a consumer perspective, it could be argued that the relevance of purchasing MSC products diminishes if their sustainability standards are merely aligned with other products readily available on shelves.
<b>114934041597</b>	Non-governmental organisation	Some fisheries, like pole and line, are inherently less likely to impact OOS species, however this should not remove a monitoring requirement completely.
<b>114933972264</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114931893479</b>	Non-governmental organisation	As noted in question #31, ISSF considers that, while we agree with the exemption for these fisheries (i.e., fisheries within EEZs and Pole and line, handline, and troll gears), for SG80, they should still be required to meet a minimum rate of independent observation coverage.
<b>114935727997</b>	Academic/scientific professional	Some type of vessel positioning system (e.g. with the use of mobile phone) and link with catch collected would be easy to implement. There should be no exceptions for certified fisheries operating in sensitive areas as they can have impacts on ETP species.

**114935339306** FIP provider

Agree but perhaps the fishery should show evidence of low risk.

**"The proposed SG80 minimum thresholds for catch monitoring and independent verification are feasible for fisheries operating in areas beyond national jurisdiction seeking to gain or maintain MSC certification."**



Feedback received		
Respondent ID	Stakeholder Category	Comments
114935854975	Conformity assessment and/or accreditation	High seas fisheries should have this in place and be working toward this level at minimum.
114935220378	Conformity assessment and/or accreditation	Please see above.
114931975029	Conformity assessment and/or accreditation	I agree with SA3.11.3 but disagree on the exception of pole and line etc.
114905584606	Conformity assessment and/or accreditation	See comments above

<b>114936603760</b>	Commercial wild-capture fisheries	If is limited to apply to fishing operation in the ocean out of the national jurisdiction, these requirements are understandable.
<b>114936439716</b>	Commercial wild-capture fisheries	I think discussion based on the RFMO is needed.
<b>114935985271</b>	Commercial wild-capture fisheries	Alaska fisheries generally do not operate in international waters, so we do not have specific feedback on this requirement.
<b>114934071628</b>	Commercial wild-capture fisheries	through EM. However EM data analysis should be through the 3rd party, not government.
<b>114935328811</b>	Commercial wild-capture fisheries	We agree with and support the comments of the Association of Sustainable Fisheries.
<b>114935030286</b>	Commercial wild-capture fisheries	The ASF agrees in general, but again there is a lack of clarity around the 20% requirement and which fisheries would be required to meet that level of performance – is this for any fishery that may at any point operate in international waters, or only for those that normally operate outside?
<b>114930478442</b>	Commercial wild-capture fisheries	If this is being considered, MSC should set different requirements, a one for high seas fisheries and another for near-shore fisheries.
<b>114935742704</b>	Non-governmental organisation	Agree, and this fact significantly weakens the value of the MSC Standard. Far more should be required of fisheries operating in ABNJ in terms of observer coverage and independent validation, particularly in light of the new technologies that are no available to support on-board monitoring.
<b>114935680642</b>	Non-governmental organisation	<p>From our perspective, the proposed SG80 minimum thresholds for catch monitoring and independent verification for fisheries operating in areas beyond national jurisdiction, specifically RFMO/High Seas fisheries, are not only feasible but are becoming concerningly too easy to reach, thereby lowering the overall standard for MSC certification.</p> <p>The proposed changes in Standard 3.1 reduce this requirement from “30% monitoring” to "at least 20% independent observation" for ETP/OOS species information at SG80. Additional exceptions allow for lower levels of independent observation if designed to achieve specified precision, are representative, implemented as a binding RFMO measure, and supported by publicly available analysis. This creates the risk of allowing those fisheries to not only benefit from lower observation thresholds, but even more importantly, provides loopholes for much lower monitoring levels, which is highly concerning.</p> <p>We view this reduction from 30% to 20% as aligning MSC's so-called "good</p>

	<p>practice" with minimum scientific acceptability and industry demands, rather than upholding its "gold standard" ambition. While the MSC justifies the 20% coverage as a "credible baseline" and a practical minimum that aligns with scientific recommendations and feasibility, we question why this threshold is not mandated for all MSC fisheries to reach SG80 if it truly represents a credible scientific baseline.</p> <p>We are concerned that these relaxed requirements for RFMO/High Seas fisheries create a situation where certifications are achieved based on minimal existing regulatory requirements, providing little added value for sustainability improvement. We advocate for maintaining or increasing the independent observation requirement for RFMO/High Seas fisheries back to 30% and removing current exemptions (with the potential for different rates for pole-and-line, handline, troll informed by science), to ensure the MSC standard genuinely incentivises fisheries to improve beyond minimum compliance. The proposed ease of reaching SG80 for these fisheries, therefore, is seen as contributing to a weakening in MSC's sustainability requirements.</p>
<p><b>114935698418</b> Non-governmental organisation</p>	<p>The minimum thresholds for catch monitoring and independent verification are feasible for all fisheries AND should be set as SG60 thresholds. Maintain or increase the independent observation requirement for RFMO/High Seas fisheries back to 30%, rather than reducing it to "at least 20%". Stronger, more prescriptive monitoring is necessary and appropriate for all fisheries/vessels at both the SG60 and 80 levels. Revert to or reinforce the requirement for "independent observation" at SG60 for most fisheries, rather than the weaker "independent verification," at SG80 which allows for less reliable methods like shore-based checks instead of on-board observers or electronic monitoring. As proposed, there is no incentive through the MSC for fisheries to improve levels of independent data collection and verification.</p>
<p><b>114935583787</b> Non-governmental organisation</p>	<p>The proposed minimum thresholds for catch monitoring and independent verification at SG80 for fisheries operating in areas beyond national jurisdiction — specifically, RFMO/high seas fisheries — are feasible. However, they are becoming too easy to reach, thereby lowering the overall MSC certification standard.</p> <p>The proposed changes to Standard 3.1 reduce the requirement from "30%</p>

monitoring" to "at least 20% independent observation" for ETP/OOS species information at SG80. Additional exceptions allow for lower levels of independent observation if they are designed to achieve specified precision, are representative, are implemented as a binding RFMO measure, and are supported by publicly available analysis. These exceptions create the risk of allowing fisheries to benefit from lower observation thresholds and provide loopholes for much lower monitoring levels, which is highly concerning.

I view the reduction from 30% to 20% as aligning the MSC's so-called "good practice" with minimum scientific acceptability and industry demands rather than upholding its "gold standard" ambition. The MSC justifies the 20% coverage as a "credible baseline" and a practical minimum that aligns with scientific recommendations and feasibility. However, I question why this threshold is not mandated for all MSC fisheries to reach SG80, as it supposedly represents a credible scientific baseline.

It is concerning that the relaxed requirements for RFMO/high seas fisheries will result in certifications based on minimal existing regulatory requirements, providing little added value for improving sustainability. I advocate maintaining or increasing the independent observation requirement for RFMO/high seas fisheries to 30% and removing current exemptions. Different rates could be considered for pole-and-line, handline, and troll fisheries, based on scientific research. This would ensure the MSC standard genuinely incentivizes fisheries to improve beyond minimum compliance. Therefore, the proposed ease of reaching SG80 for these fisheries is seen as contributing to a weakening of MSC's sustainability requirements.

**114935402174** Non-governmental organisation

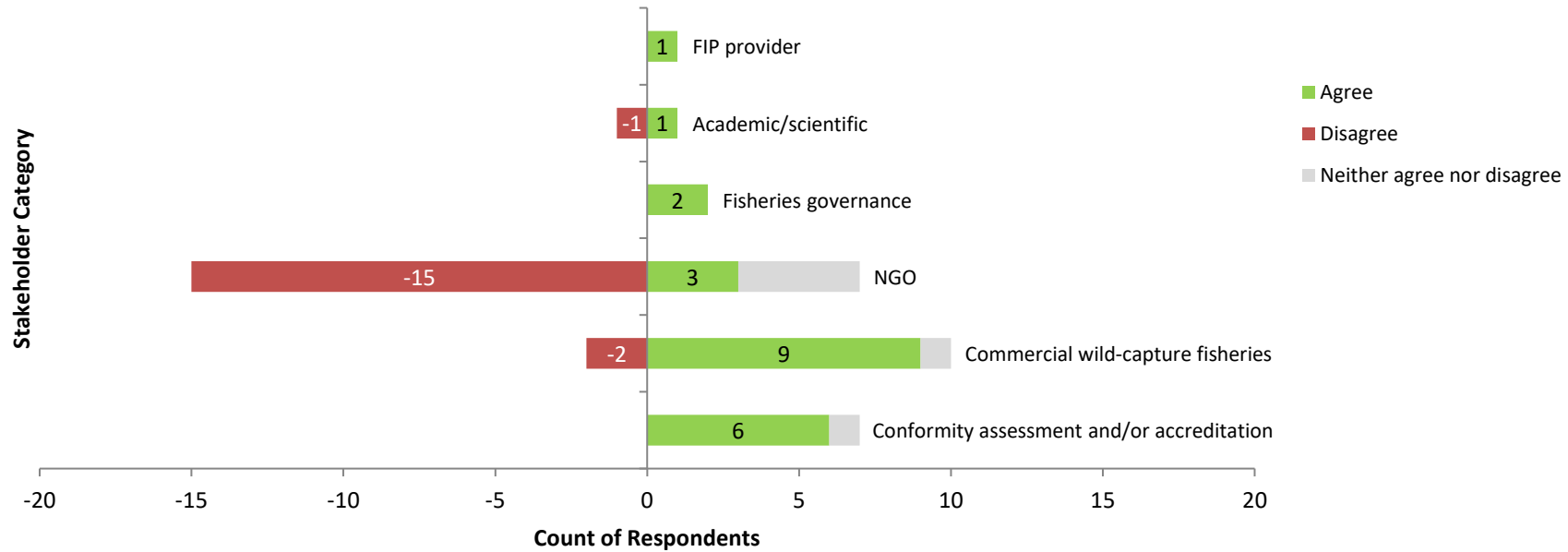
The proposed SG80 thresholds for catch monitoring and independent verification in RFMO/High Seas fisheries are seen as too easy to meet, reducing MSC's "gold standard." Lowering independent observation from 30% to 20%, along with multiple exemptions, risks minimal monitoring and aligns more with industry convenience than true sustainability. This could allow certifications based on minimal regulatory compliance, providing little improvement in conservation. The recommendation is to maintain or raise observation to 30% and remove exemptions to ensure MSC standards genuinely drive sustainability beyond minimum requirements.

<b>114935537358</b>	Non-governmental organisation	<p>From my perspective, the proposed SG80 minimum thresholds for catch monitoring and independent verification for fisheries operating in areas beyond national jurisdiction, specifically RFMO/High Seas fisheries, are not only feasible but are becoming concerningly too easy to reach, thereby lowering the overall standard for MSC certification.</p> <p>The proposed changes in Standard 3.1 reduce this requirement from “30% monitoring” to "at least 20% independent observation" for ETP/OOS species information at SG80. Additional exceptions allow for lower levels of independent observation if designed to achieve specified precision, are representative, implemented as a binding RFMO measure, and supported by publicly available analysis. This creates the risk of allowing those fisheries to not only benefit from lower observation thresholds, but even more importantly, provides loopholes for much lower monitoring levels, which is highly concerning.</p> <p>I view this reduction from 30% to 20% as aligning MSC’s so-called "good practice" with minimum scientific acceptability and industry demands, rather than upholding its "gold standard" ambition. While the MSC justifies the 20% coverage as a "credible baseline" and a practical minimum that aligns with scientific recommendations and feasibility, we question why this threshold is not mandated for all MSC fisheries to reach SG80 if it truly represents a credible scientific baseline.</p> <p>I am concerned that these relaxed requirements for RFMO/High Seas fisheries create a situation where certifications are achieved based on minimal existing regulatory requirements, providing little added value for sustainability improvement. We advocate for maintaining or increasing the independent observation requirement for RFMO/High Seas fisheries back to 30% and removing current exemptions (with the potential for different rates for pole-and-line, handline, troll informed by science), to ensure the MSC standard genuinely incentivises fisheries to improve beyond minimum compliance. The proposed ease of reaching SG80 for these fisheries, therefore, is seen as contributing to a weakening in MSC’s sustainability requirements.</p>
<b>114935463463</b>	Non-governmental organisation	<p>114935463463 disagrees. The proposed SG80 thresholds (self-reporting plus independent verification, with 20% independent observation on the high seas)</p>

		are not sufficient to ensure credible monitoring in ABNJ fisheries, where governance and enforcement are weakest. Feasibility is not the main barrier — these fleets are typically large, industrial, and technically capable of implementing higher coverage. What is missing is ambition. Lowering the bar from 30% to 20% and allowing broad “verification” alternatives instead of requiring in-situ observation entrenches inadequate monitoring for some of the most vulnerable ecosystems. With rapid advances in electronic monitoring, achieving ≥50% and moving toward 100% coverage is realistic in the 2030s. Locking in 20% as the global expectation until 2040 greatly risks legitimising weak monitoring at exactly the time when higher standards are both feasible and urgently needed.
<b>114935201693</b>	Non-governmental organisation	Fisheries operating on the high seas are large commercial, industrial fisheries that catch billions of dollars of seafood each year, while also having large potential impacts on non-target stocks and species. There are no financial or technical reasons why it should not be feasible to reach a level of 20% independent observations through a combination of human observers and electronic monitoring.
<b>114935167081</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114935145363</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114934996080</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114934471709</b>	Non-governmental organisation	<p>The proposed SG80 minimum thresholds for catch monitoring and independent verification for fisheries operating in areas beyond national jurisdiction, specifically RFMO/High Seas fisheries, are too easy to reach, thereby lowering the overall standard for MSC certification. The proposed change is creating a risk where these fisheries could benefit from lower observation thresholds and, more importantly, provides loopholes for much lower monitoring levels, which is a significant concern. This reduction from 30% to 20% is simply aligning MSC’s “good practice” with minimum scientific acceptability and industry demands, rather than upholding its “gold standard” ambition.</p> <p>The relaxed requirements for RFMO/High Seas fisheries could lead to certifications being achieved based on minimal existing regulatory requirements, offering little added value for sustainability improvement. Advocacy exists for</p>

		maintaining or increasing the independent observation requirement for RFMO/High Seas fisheries back to 30% and removing current exemptions, with potential consideration for different rates for pole-and-line, handline, and troll methods if informed by science. The MSC standard should be genuinely incentivising fisheries to improve beyond minimum compliance. Therefore, the proposed ease of reaching SG80 for these fisheries is contributing to a weakening in MSC's sustainability requirements
<b>114934041597</b>	Non-governmental organisation	Fisheries operating in areas beyond national jurisdiction are currently poorly monitored, lacking in enforcement and often highly subsidised. The value of greater market access should be used as a strong incentive for rapid change toward highly transparent and well-enforced fisheries. Observers and electronic monitoring systems offer affordable options that are available now.
<b>114933972264</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114899462711</b>	Non-governmental organisation	Yes, but see response to Q. 32

"I support the proposal to require that assessors use the ERF to evaluate whether information is adequate for a 'detailed understanding' of impacts at the SG100 level, noting the removal of a prescriptive catch monitoring requirement."



Feedback received		
Respondent ID	Stakeholder Category	Comments
114935854975	Conformity assessment and/or accreditation	Removing prescriptive requirement is appropriate.
114926778971	Conformity assessment and/or accreditation	a "census" was too high a bar
114936439716	Commercial wild-capture fisheries	I think evaluating on a case-by-case basis is good.
114935985271	Commercial wild-capture fisheries	114935985271 agrees with the removal of a prescriptive catch monitoring requirement from the SG100 level, as this restores focus to the outcome

		(information adequate for a detailed understanding of impacts) rather than prescribing means for achieving that outcome.
<b>114935328811</b>	Commercial wild-capture fisheries	We agree with and support the comments of the Association of Sustainable Fisheries.
<b>114935030286</b>	Commercial wild-capture fisheries	Yes – the ASF agrees with this statement.
<b>114930478442</b>	Commercial wild-capture fisheries	If assessors will additionally apply ERF at SG100, then there's no point of pass without condition.
<b>114935742704</b>	Non-governmental organisation	We do not agree with the removal of the prescriptive catch monitoring requirement and replacement with the ERF.
<b>114935713917</b>	Non-governmental organisation	We do not support the removal of the prescriptive catch monitoring requirement.
<b>114935680642</b>	Non-governmental organisation	<p>We would not support the proposed changes to require assessors to use the Evidence Requirements Framework (ERF) to evaluate whether information is adequate for a 'detailed understanding' of impacts at the SG100 (Best Practice) level, particularly when noting the removal of a prescriptive catch monitoring requirement at this level.</p> <ul style="list-style-type: none"> <li>• Weakening of SG100 Requirements: Under Version 3 of the MSC Fisheries Standard, SG100 explicitly required a catch monitoring system that monitored all catch events using "independent observation". The proposed changes replace this with an ERF evaluation of whether information is "adequate to estimate the impact on the relevant species with a high degree of certainty". While the MSC argues this offers flexibility, we view this removal of a clear, prescriptive requirement for 100% independent observation as a significant weakening of the "Best Practice" standard.</li> <li>• Lack of Incentive for Improvement: we are concerned that if certification can be achieved without conditions at SG80 using less stringent "independent verification" methods and minimal quantitative data, it is not clear why a fishery would make the effort to improve to SG100 and demonstrate the same but "with a high degree of certainty". This suggests that even a rigorous ERF evaluation at SG100 might not sufficiently incentivize fisheries to achieve genuinely superior monitoring standards, especially when prescriptive requirements are removed.</li> <li>• Risks of Inconsistency and Subjectivity: the revised ERF, which removes structured guidance and specific "degrees of accuracy" from scoring guideposts, will lead to inconsistency between assessments. The new "Consideration of</li> </ul>

	<p>information accuracy" within the ERF, lacks clear indications or rankings for "high," "medium," or "low" accuracy. This increased reliance on "expert judgment" creates uncertainties and potential loopholes, making it difficult to ensure a consistent 'detailed understanding' across different fisheries and assessors.</p> <ul style="list-style-type: none"> <li>• Erosion of "Gold Standard": we support the MSC to be an "ambitious, 'gold-standard'" for fishing sustainability. The replacement of a clear, prescriptive requirement like 100% independent observation at SG100 with a more subjective ERF evaluation, contributes to a serious drawback in sustainability requirements, rather than upholding the highest possible standards.</li> </ul> <p>Therefore, while the proposal mentions a "detailed understanding of impacts", the simultaneous removal of the prescriptive catch monitoring requirement challenges its feasibility.</p>
<p><b>114935698418</b>    Non-governmental organisation</p>	<p>The MSC has stated that the ERF is intended to "inform, rather than prescribe" scoring. Therefore, the inclusion within the ERF is insufficient to ensure that assessors have thoroughly considered this topic when making decisions on scoring guideposts. It should be explicit in the standard, and assessors should justify their decision-making in the certification report. Structured guidance on a clear scoring system to mitigate the risk of inconsistency between CABs should be reintroduced, as should prescriptive monitoring requirements.</p>
<p><b>114935583787</b>    Non-governmental organisation</p>	<p>I do not support the proposed changes that would require assessors to use the Evidence Requirements Framework (ERF) to evaluate whether information is adequate for a "detailed understanding" of impacts at the SG100 (Best Practice) level. This is particularly concerning given the removal of a prescriptive catch monitoring requirement at this level.</p> <ul style="list-style-type: none"> <li>• Weakening of SG100 Requirements: Under Version 3 of the MSC Fisheries Standard, SG100 explicitly required a catch monitoring system that used "independent observation" to monitor all catch events. The proposed changes replace this requirement with an ERF evaluation to determine if the information is "adequate to estimate the impact on the relevant species with a high degree of certainty." While the MSC argues that this offers flexibility, we view the removal of the clear, prescriptive requirement for 100% independent observation as a significant weakening of the "best practice" standard.</li> <li>• Lack of incentive for improvement: It is concerning that if certification can be</li> </ul>

achieved without conditions at SG80 using less stringent "independent verification" methods and minimal quantitative data, it is unclear why a fishery would improve to SG100 and demonstrate the same "with a high degree of certainty." This suggests that even a rigorous ERF evaluation at SG100 might not sufficiently incentivize fisheries to achieve superior monitoring standards, especially when prescriptive requirements are removed.

- Risks of Inconsistency and Subjectivity: The revised ERF removes structured guidance and specific "degrees of accuracy" from the scoring guideposts, which will lead to inconsistency between assessments. The new "Consideration of Information Accuracy" section of the ERF lacks clear indications or rankings for "high," "medium," or "low" accuracy. This increased reliance on "expert judgment" creates uncertainties and potential loopholes, making it difficult to ensure a consistent "detailed understanding" across different fisheries and assessors.
- Erosion of the "Gold Standard": I support the MSC as an ambitious "gold standard" for fishing sustainability. Replacing a clear, prescriptive requirement such as 100% independent observation at SG100 with a more subjective ERF evaluation contributes to a serious drawback in sustainability requirements rather than upholding the highest possible standards.

Therefore, although the proposal mentions a "detailed understanding of impacts," the simultaneous removal of the prescriptive catch monitoring requirement calls into question its feasibility.

**114935402174** Non-governmental organisation

I do not support the proposed changes requiring assessors to rely on the Evidence Requirements Framework (ERF) to determine if information provides a "detailed understanding" at SG100 (Best Practice), especially given the removal of prescriptive catch monitoring requirements.

-Weakening of SG100 Standards: Version 3 mandated 100% independent observation of all catch events at SG100. The proposal replaces this with an ERF-based assessment of whether information is "adequate to estimate impacts with high certainty," which removes the clear, prescriptive standard and weakens the "Best Practice" benchmark.

-Limited Incentive for Improvement: If fisheries can achieve SG80 using minimal verification and quantitative data, there is little motivation to reach SG100, since the ERF approach may not sufficiently reward genuinely superior monitoring.

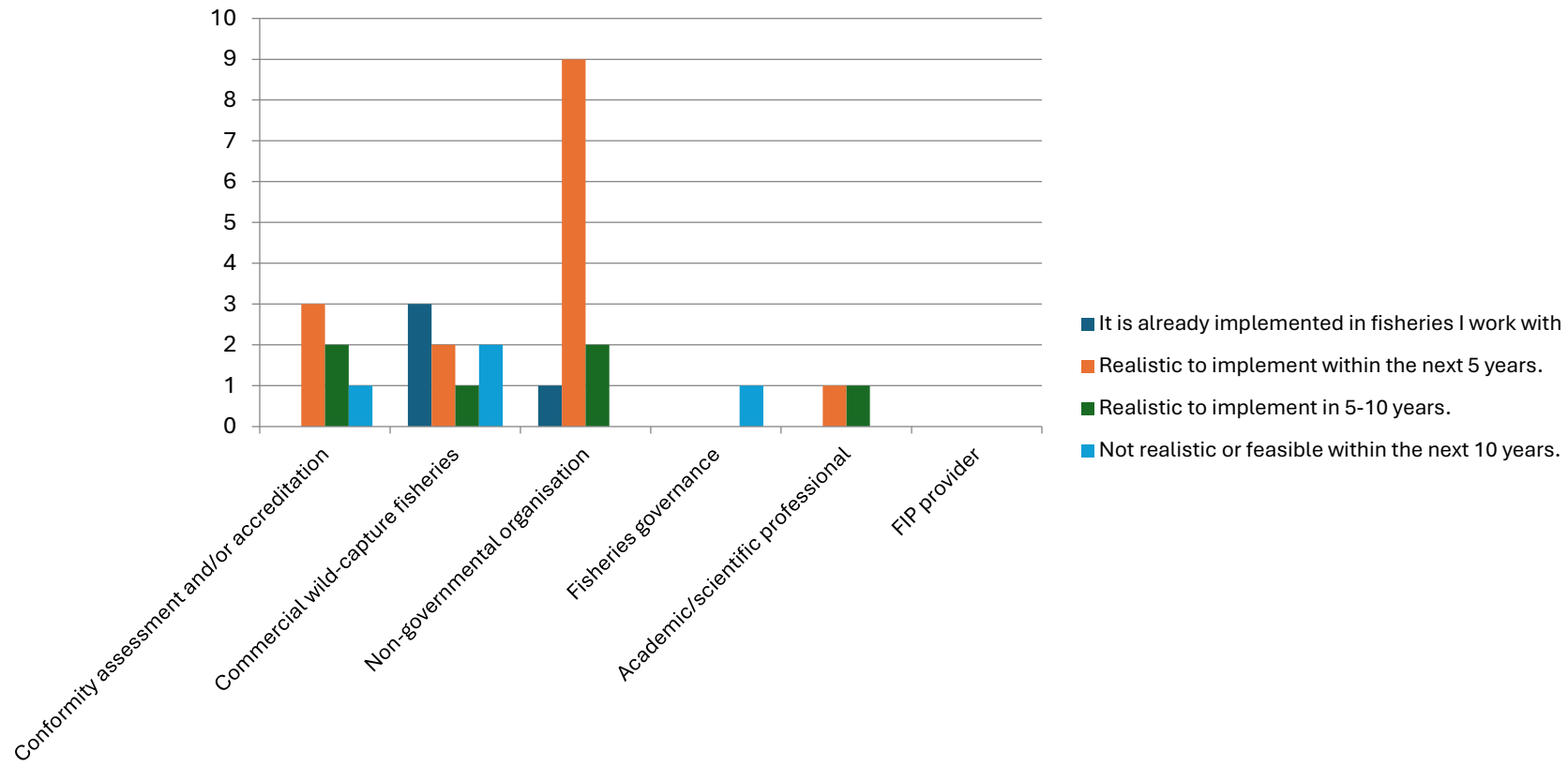
-Inconsistency and Subjectivity: The revised ERF eliminates structured guidance

	<p>and defined accuracy levels, increasing reliance on expert judgment. This risks inconsistent assessments and potential loopholes across fisheries.</p> <p>-Erosion of the “High-level Standard”: Replacing 100% independent observation with a subjective ERF evaluation undermines MSC’s ambition to maintain the highest sustainability standards.</p> <p>In sumamry, while the proposal emphasizes a “detailed understanding of impacts,” removing prescriptive monitoring requirements makes achieving this standard unrealistic and weakens overall sustainability outcomes.</p>
<p><b>114935537358</b> Non-governmental organisation</p>	<p>I would not support the proposed changes to require assessors to use the Evidence Requirements Framework (ERF) to evaluate whether information is adequate for a 'detailed understanding' of impacts at the SG100 (Best Practice) level, particularly when noting the removal of a prescriptive catch monitoring requirement at this level.</p> <ul style="list-style-type: none"> <li>• Weakening of SG100 Requirements: Under Version 3 of the MSC Fisheries Standard, SG100 explicitly required a catch monitoring system that monitored all catch events using "independent observation". The proposed changes replace this with an ERF evaluation of whether information is "adequate to estimate the impact on the relevant species with a high degree of certainty". While the MSC argues this offers flexibility, we view this removal of a clear, prescriptive requirement for 100% independent observation as a significant weakening of the "Best Practice" standard.</li> <li>• Lack of Incentive for Improvement: we are concerned that if certification can be achieved without conditions at SG80 using less stringent "independent verification" methods and minimal quantitative data, it is not clear why a fishery would make the effort to improve to SG100 and demonstrate the same but “with a high degree of certainty”. This suggests that even a rigorous ERF evaluation at SG100 might not sufficiently incentivize fisheries to achieve genuinely superior monitoring standards, especially when prescriptive requirements are removed.</li> <li>• Risks of Inconsistency and Subjectivity: the revised ERF, which removes structured guidance and specific "degrees of accuracy" from scoring guideposts, will lead to inconsistency between assessments. The new "Consideration of information accuracy" within the ERF, lacks clear indications or rankings for "high," "medium," or "low" accuracy. This increased reliance on "expert judgment" creates uncertainties and potential loopholes, making it difficult to ensure a</li> </ul>

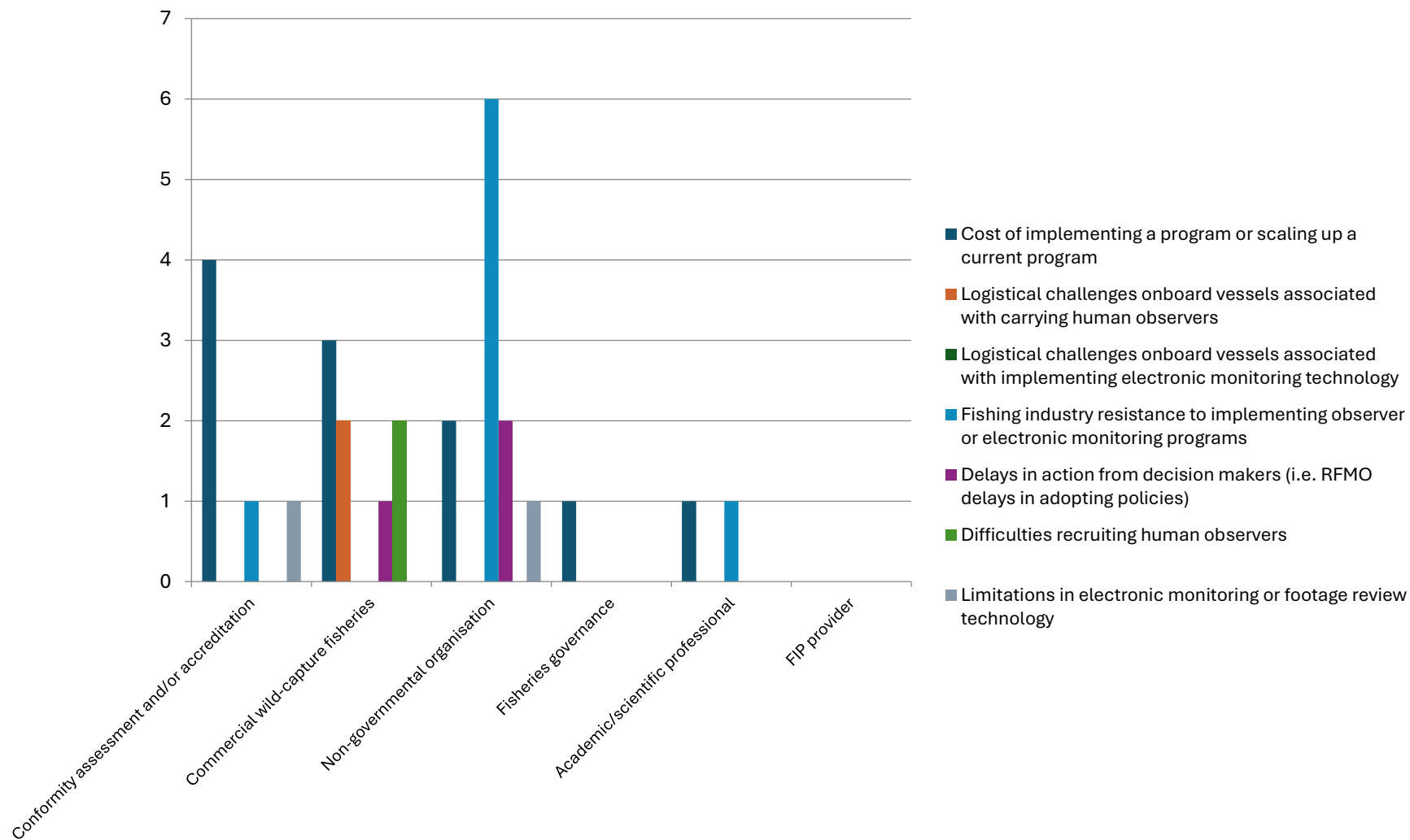
		<p>consistent 'detailed understanding' across different fisheries and assessors.</p> <ul style="list-style-type: none"> <li>• Erosion of "Gold Standard": we support the MSC to be an "ambitious, 'gold-standard'" for fishing sustainability. The replacement of a clear, prescriptive requirement like 100% independent observation at SG100 with a more subjective ERF evaluation, contributes to a serious drawback in sustainability requirements, rather than upholding the highest possible standards.</li> </ul> <p>Therefore, while the proposal mentions a “detailed understanding of impacts”, the simultaneous removal of the prescriptive catch monitoring requirement challenges its feasibility.</p>
<b>114935463463</b>	Non-governmental organisation	<p>114935463463 disagrees. Under v3.0/3.1 and ERF v1.1, SG100 was explicitly tied to Precision Guidepost PG3, which required that “the catch monitoring system in place enables a census of catches using independent observation.” This meant near-100% coverage — a clear and measurable benchmark for best practice. The new proposal removes this requirement and replaces it with a subjective judgement that information is “adequate to estimate with a high degree of certainty,” assessed via the ERF process. While the ERF requires consideration of objectivity, relevance, completeness, and consistency, this is not equivalent to a binding coverage benchmark. For SG100, best practice should continue to mean close to full independent coverage — a target that is increasingly feasible through electronic monitoring and should become the norm for industrial fisheries in the 2030s. By removing the census requirement, MSC weakens the top sustainability bar and risks inconsistency across CABs.</p>
<b>114935201693</b>	Non-governmental organisation	Detailed understanding is a vague and non-defined term.
<b>114935167081</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114935145363</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114934996080</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114934471709</b>	Non-governmental organisation	Duplicate of 114935402174
<b>114934041597</b>	Non-governmental organisation	I disagree with the removal of a prescriptive catch monitoring requirement at SG100. For SG100 there should be 100% independent monitoring.

114933972264	Non-governmental organisation	Duplicate of 114935680642
114931893479	Non-governmental organisation	<p>ISSF does not agree with the proposal to remove prescriptive monitoring requirements at the SG100 level.</p> <p>Fisheries that operate in the high seas, or those that interact with rare ETP/OOS species should be subject to higher levels of coverage (e.g., at least 50% - see our response to question #32).</p> <p>As noted in responses to other questions in this survey, this requirement would not necessarily apply to pole and line, troll and handline fisheries operating in the high seas.</p> <p>Not establishing a threshold at the SG100 level may be counterproductive. For example, some fisheries with high bycatch rates (e.g., pelagic longline) could still meet SG100 —described as “state-of-the-art”— with only 30% observer coverage. While 30% coverage may be deemed as sufficient to have an understanding of a fishery’s interactions with in-scope and ETP/OOS common species, it falls short of what should be considered “state-of-the-art”, as it would fail to record encounters with rare ETP/OOS species.</p> <p>Additionally, there are already fisheries with 100% or near-100% coverage, which is regarded as best practice and, in some cases, mandated by management bodies (e.g., 100% observer coverage for large-scale purse seiners targeting tropical tuna in the Pacific Ocean). Setting a lower bar for other fisheries under MSC requirements could undermine a level playing field and dilute incentives for adopting best practice.</p> <p>Lastly, given all advancements made in terms of electronic monitoring systems in recent years, it feels inadequate to aim for lower levels of observer coverage when, in many cases, EMS could be used to increase them.</p>

**When do you believe it is realistic to implement 20% observer or electronic monitoring coverage in the fisheries you work with?**

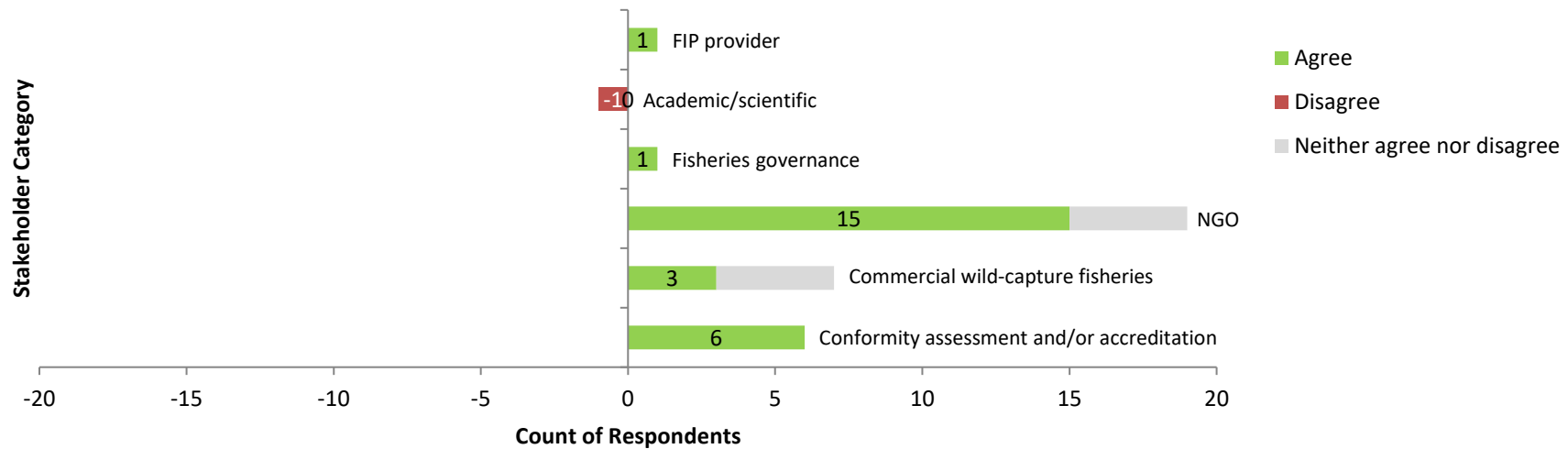


**What do you believe are the most significant barriers to fisheries reaching 20% observer coverage in the fisheries you work with?**



# Appendix IV: Stakeholder consultation feedback, Risk-Based Framework

"The guidance added in G5.2 clarifies what is meant by “independent source” when determining if the RBF is applicable to ETP/OOS species outcome."



Feedback received		
Respondent ID	Stakeholder Category	Comments
114931975029	Conformity assessment and/or accreditation	it does, but i think this raises an issue in terms of condition timelines. To get a study and external review commissioned, implemented, completed and reviewed in 4 years? no chance! yes there is exceptional circumstances but perhaps this needs further consideration

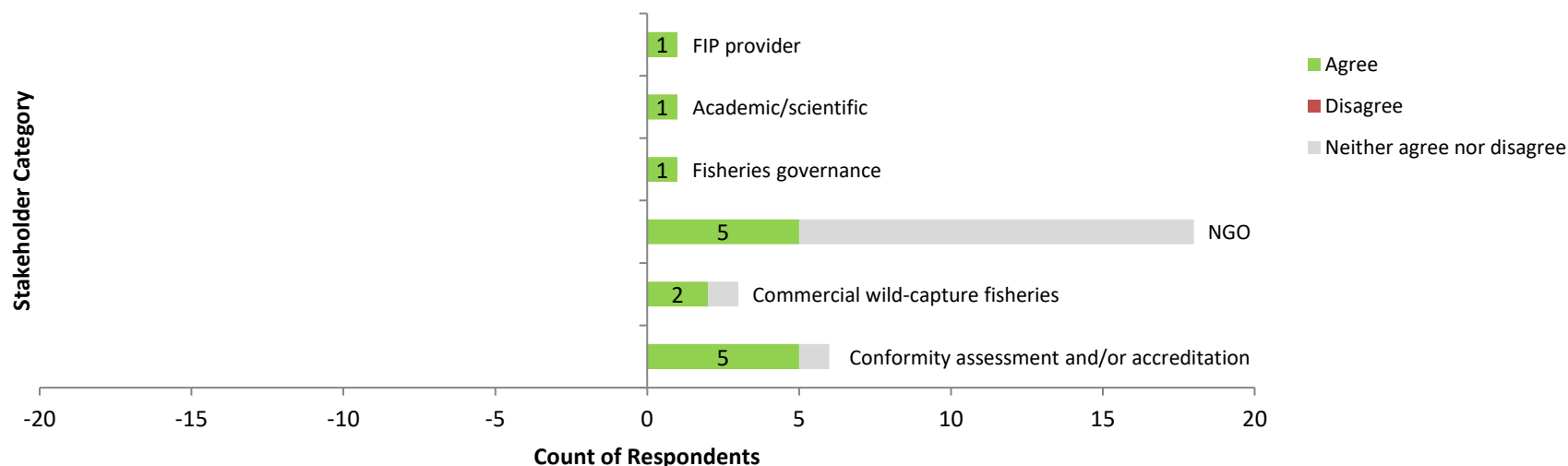
<b>114935985271</b>	Commercial wild-capture fisheries	114935985271 agrees with ASF's feedback on this point, which we include here. Additionally, we believe it is important for the RBF to reinforce the role of CABs as independent experts. Adding additional layers of independent review for information that the CAB is capable of evaluating for independence/bias creates significant additional costs for fishery clients and undermines the role of CABs as independent experts. ASF's feedback on this point follows: "ASF generally agrees that the guidance clarifies what is meant by an independent source, but we believe the clarification indicates an unreasonable or unrealistic expectation of 'independence' that will add cost, complexity and difficulty to the process. In essence, where an independent contractor is consulted to provide an assessment of status and impact, the CAB should be able to use its judgement as to the independence and quality of that assessment (as the CAB has to do for any information) without requiring that an additional contractor be paid to provide peer review – this would simply be another contractor to pay, liable to as much bias as the first contractor, when finding a qualified and available individual in the first instance may be difficult. We feel this is at least one step too far, and likely two, given we would instead advocate for the CAB to be able to undertake the analysis in the first instance. We also note there is a inappropriate complexity / incongruity here where OOS are required to be treated the same as ETP species – we feel this will be difficult to explain to managers and will be challenging to implement – OOS should be treated differently to ETP species."
<b>114934879929</b>	Commercial wild-capture fisheries	this section states "independent of the CAB" which makes sense
<b>114935328811</b>	Commercial wild-capture fisheries	We agree with and support the comments of the Association of Sustainable Fisheries.
<b>114935030286</b>	Commercial wild-capture fisheries	ASF generally agrees that the guidance clarifies what is meant by an independent source, but we believe the clarification indicates an unreasonable or unrealistic expectation of 'independence' that will add cost, complexity and difficulty to the process. In essence, where an independent contractor is consulted to provide an assessment of status and impact, the CAB should be able to use its judgement as to the independence and quality of that assessment (as the CAB actually has to do for any information it is presented with for an audit) without requiring that an additional contractor be paid to provide peer review – this would simply be another contractor to pay, liable to as much bias as the first contractor, when finding a qualified and available individual in the first instance may be difficult. We feel this is at least one step too far, and likely two,

		given we would instead advocate for the CAB to be able to undertake the analysis in the first instance. We also note there is a inappropriate complexity / incongruity here where OOS are required to be treated the same as ETP species – we feel this will be difficult to explain to managers and will be challenging to implement – OOS should be treated differently to ETP species.
<b>114935680642</b>	Non-governmental organisation	Yes, we welcome this clarification.
<b>114935583787</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114935402174</b>	Non-governmental organisation	Yes, this clarification is helpful.
<b>114935537358</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114935463463</b>	Non-governmental organisation	114935463463 recognises that adding guidance on “independent source” in G5.2 is a step forward. It is helpful that peer review of client-funded studies can provide a pathway to independence in data-poor contexts. However, the guidance remains too open to interpretation: it does not define what constitutes acceptable peer review, nor does it set minimum methodological standards. As a result, CABs could still treat weak, poorly reviewed, or potentially biased analyses as “independent,” leading to inconsistent application of RBF triggers. 114935463463 recommends clarifying that “independent source” must involve either (a) monitoring or data collection external to the client and CAB, or (b) client-funded studies that are subject to robust, transparent, and auditable peer review.
<b>114935167081</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114935145363</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114934996080</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114934041597</b>	Non-governmental organisation	This is a welcome change
<b>114933972264</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114899462711</b>	Non-governmental organisation	Except, I didn't find Table 5.

**114900517337** Academic/scientific professional

not only AS P1 species, if the LTL species fish was categorized as OOS species, as they are too sensitive to environmental fluctuations and population recruitment, I do not agree the LTL species are only mentioned as adult fish. the Larva of LTL are not certified at all. I think all potential LTL should be have their own PSA forms.

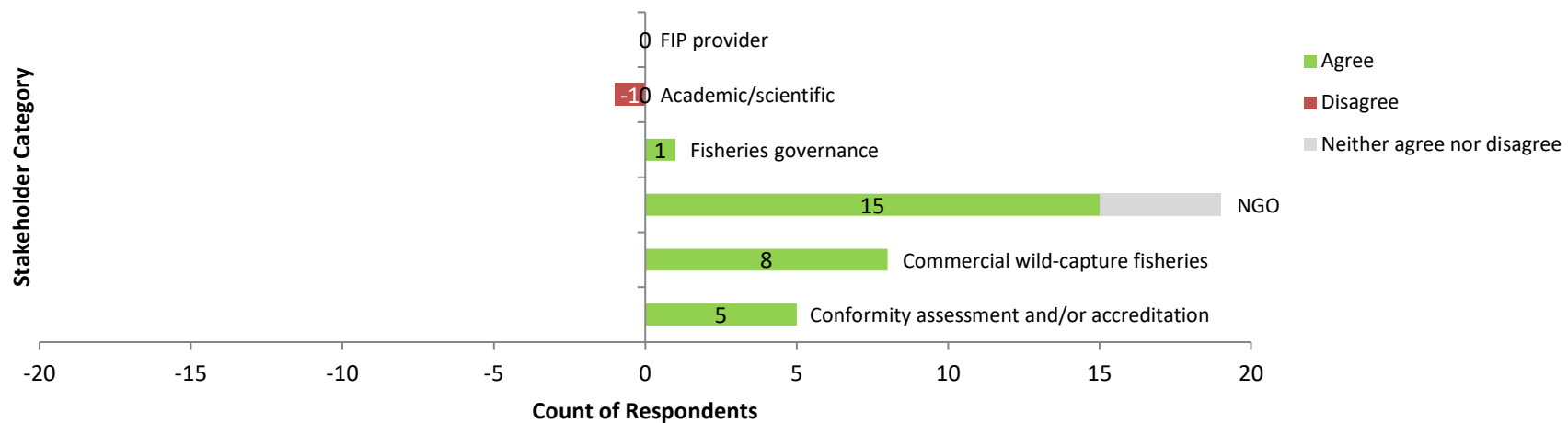
"The additions to Table A1 clarify how management strategy Performance Indicators should be scored when the RBF is used to score outcome."



Feedback received		
Respondent ID	Stakeholder Category	Comments
114935328811	Commercial wild-capture fisheries	We agree with and support the comments of the Association of Sustainable Fisheries.
114935030286	Commercial wild-capture fisheries	The edits to Table A1 require further consideration, and potentially explanation or guidance, but at this time we believe they should be helpful in clarifying intent for assessors.
114935680642	Non-governmental organisation	While Table A1 provides instructions to score PI 2.2.2a "as normal" when the RBF is triggered for 2.2.1, and to consider how the management strategy minimises mortalities and maintains susceptibility at or below acceptable levels given species productivity, we find this description quite vague and lacking practical guidance for assessors, with risks of varying interpretation by different assessors (risks inconsistencies). We would welcome further improvements in clarity and practicality, in that regard.
114935583787	Non-governmental organisation	Duplicate of 114935680642

<b>114935402174</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114935537358</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114935463463</b>	Non-governmental organisation	114935463463 agrees that the additions to Table A1 are a useful clarification. Linking management strategy PIs directly to outcome PIs scored through the RBF ensures that risks identified in data-limited assessments are not overlooked when evaluating management performance. However, this improvement depends on consistent application by CABs. Without worked examples and explicit guidance, assessors may still interpret the linkage unevenly. 114935463463 therefore recommends that the Toolbox include illustrative examples showing how management PIs should be scored when outcome risks are identified through PSA or other RBF tools, to support consistent, precautionary application across fisheries.
<b>114935167081</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114935145363</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114934996080</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114934471709</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114921832004</b>	Non-governmental organisation	The improvements to the RBF enhance methodological clarity, but we encourage MSC to expand the criteria used in risk assessments to consider risk of poor welfare outcomes, such as injury rates of ETP/OOS species, air exposure duration, retention method of ETP/OOS species, and slaughter method (with or without prior stunning). These risks are often correlated with conservation risks and deserve attention, even if treated qualitatively.
<b>114933972264</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114925202249</b>	Non-governmental organisation	Duplicate of 114921832004

**"The revisions in A2.1 to A2.3 improve the way stakeholders are engaged in the RBF process."**

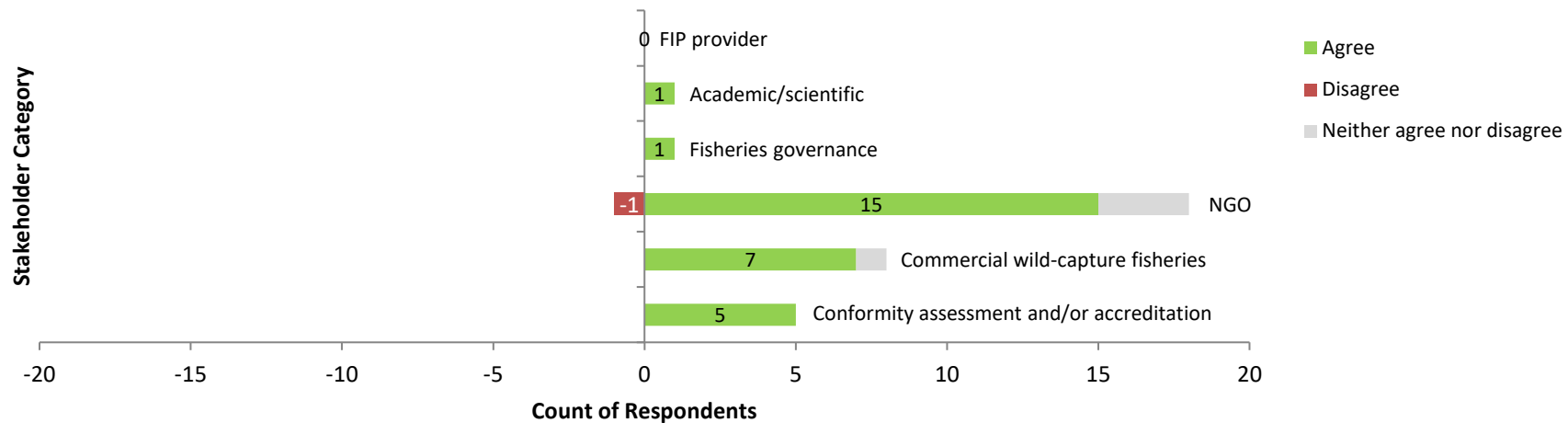


Feedback received		
Respondent ID	Stakeholder Category	Comments
114935854975	Conformity assessment and/or accreditation	Assuming stakeholders can be informed of use of RBF in the same stakeholder notification for the ACDR, this removes redundancy and reduces the number of emails to be sent/received.
114934751228	Conformity assessment and/or accreditation	Strongly agree with this. It will create more work upfront, but it will reach more stakeholders and help the client understand the process. I have completed a few RBFs. I found it is difficult to engage stakeholders, and client has had some difficulty in understanding why they are failing prior to the meetings. I think providing the RBF in the ACDR draft will allow more stakeholders to engage, provide more transparency, and make the process easier to explain to the clients.
114931975029	Conformity assessment and/or accreditation	I think there is a conflict between A2.1.4 and 5.2.9 The team shall not change the tool(s) it has selected after the date of the site visit. Can you check this please. If RBF is not initially announced but then found to be needed
114905584606	Conformity assessment and/or accreditation	Strongly agree with the stakeholder involvement changes
114935328811	Commercial wild-capture fisheries	We agree with and support the comments of the Association of Sustainable Fisheries.

<b>114935030286</b>	Commercial wild-capture fisheries	The ASF agrees with the statement, thank you.
<b>114935463463</b>	Non-governmental organisation	114935463463 agrees that the revisions streamline the RBF process and improve early engagement by including information gaps and draft RBF scores in the Announcement Comment Draft Report. This is a step forward for transparency. However, flexibility in engagement formats must not reduce transparency of stakeholder contributions. Where multiple stakeholders or experts are involved, it must be ensured that all inputs and discussions are visible to all parties before the final score is published. 114935463463 therefore recommends that CABs be required to document and share the consultation process and stakeholder inputs in a transparent manner as part of the assessment record.
<b>114925202249</b>	Non-governmental organisation	<p>Aquatic Life Institute appreciates the opportunity to comment on the proposed revisions to the MSC Fisheries Standard Toolbox. Our comments are supported by 158 members of the global Aquatic Animal Alliance.</p> <p>While MSC does not currently include animal welfare within its assessment criteria, several of the proposed changes — particularly those related to evidence quality, monitoring, and risk assessment — provide valuable entry points for indirectly addressing animal suffering in certified fisheries. We believe MSC has a timely opportunity to begin laying the foundation for future inclusion of explicit aquatic animal welfare safeguards, especially for discarded and non-target species that are often injured or killed without consideration of their welfare.</p> <p>Humane treatment of aquatic animals is increasingly seen as integral to responsible seafood production, not only by consumers and NGOs, but also by industry stakeholders and supply chain actors. To that end, we are active participants in the Global Dialogue on Seafood Traceability (GDST) and are currently leading the development of an Animal Welfare Extension Framework, which would allow end-users to record and transmit key welfare-related data from the point of capture onward. These Key Data Elements could include, for example:</p> <ul style="list-style-type: none"> <li>• Capture duration</li> <li>• Capture depth</li> <li>• Method of transport of live animals</li> </ul>

	<ul style="list-style-type: none"> <li>• Slaughter method, and whether humane stunning was applied prior to slaughter</li> </ul> <p>We encourage MSC to monitor these parallel developments and to consider ways that future versions of the Fisheries Standard can encourage and highlight outstanding actors for their welfare-oriented policies. Even if welfare remains outside the current scope, the MSC's influence could accelerate meaningful improvements in fishing practices and ensure that sustainability does not come at the cost of avoidable suffering.</p>
<b>114900517337</b> Academic/scientific professional	if no 30 days consultant period for stakeholders, there should be a detailed stakeholder consultation process for data gap.

**"I support the revisions in A2.1 to A2.3."**

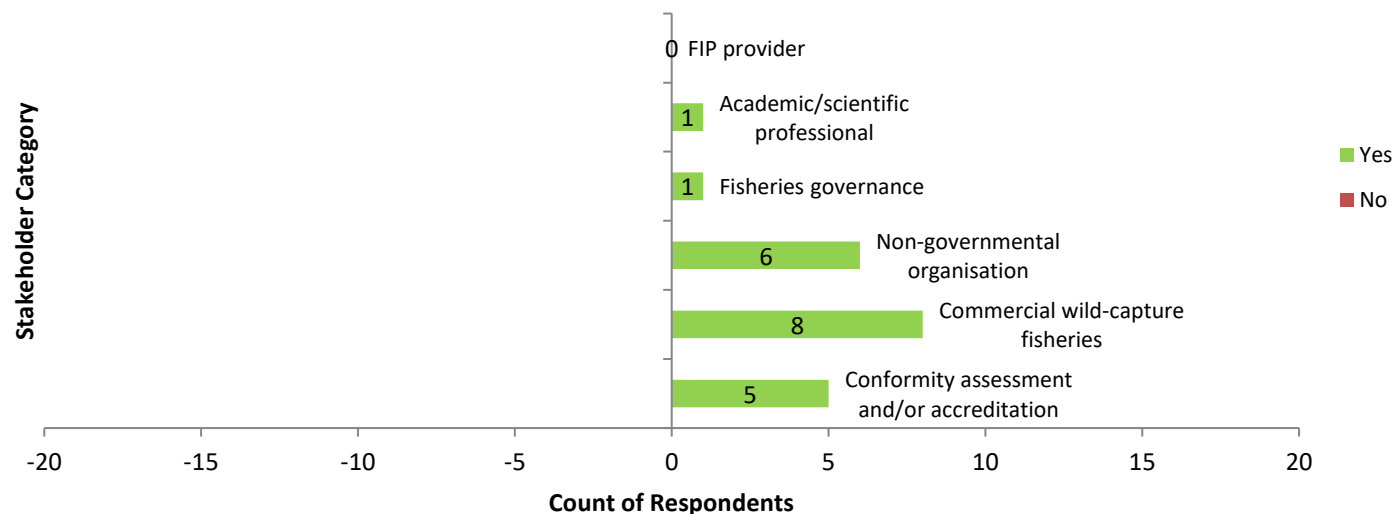


Feedback received		
Respondent ID	Stakeholder Category	Comments
114935854975	Conformity assessment and/or accreditation	While “frontloading” the RBF effort to the ACDR stage may delay some fishery announcements, it makes sense to go into the site visit with draft scores and seek input for gaps and to confirm/support scores.
114935220378	Conformity assessment and/or accreditation	Please also consider the RBF in the context of surveillances and what is required when a new scoring element identified after the site visit requires RBF.
114931975029	Conformity assessment and/or accreditation	A2.2.4 should have an 'a' and 'b' not an 'a' and 'i'
114935328811	Commercial wild-capture fisheries	We agree with and support the comments of the Association of Sustainable Fisheries.
114935030286	Commercial wild-capture fisheries	The ASF supports the changes.
114935463463	Non-governmental organisation	114935463463 cannot support the revisions as currently drafted. The new A2.3.5 weakens the precautionary safeguard that previously required the more precautionary score to be assigned if consensus was not reached. While 114935463463 recognises the risk of the process being derailed by unsupported stakeholder positions, the proposed language shifts too much discretion to the

	<p>CAB. “Considering the precautionary approach” is insufficient; the precautionary approach must be applied as the default principle when uncertainty or disagreement remains. 114935463463 therefore recommends strengthening A2.3.5 to require that, in the absence of clear and robust evidence, the more precautionary score shall be assigned.</p>
<p><b>114921832004</b> Non-governmental organisation</p>	<p>Lever Foundation welcomes the opportunity to comment on the proposed revisions to the MSC Fisheries Standard Toolbox.</p> <p>While MSC does not currently assess animal welfare, several of the proposed changes, particularly those concerning evidence quality, monitoring, and risk assessment, create natural entry points for incorporating welfare-relevant considerations. Lever Foundation has co-developed the Model Seafood Welfare Standard (MSWS) with leading NGOs, which provides a practical framework for measuring and improving welfare outcomes in seafood supply chains.</p> <p>We encourage MSC to monitor these parallel developments and explore ways to recognize fisheries and companies that voluntarily collect or report welfare-related data.</p> <p>Key Data Elements (KDEs) and their alignment with MSC Performance Indicators could include:</p> <ul style="list-style-type: none"> <li>● Time out of water (PIs 2.1.1, 2.2.1): Monitoring air exposure for retained and released species supports assessments of survival likelihood for non-target and ETP/OOS species.</li> <li>● Injury rates and vitality scores (PIs 2.1.3, 2.2.3): Injury/vitality monitoring improves accuracy of post-release mortality estimates, strengthening information adequacy requirements.</li> <li>● Capture method and duration (e.g., tow time, soak time) (PIs 2.3.1, 2.4.1): These directly influence both mortality and ecosystem impacts, providing measurable evidence for risk-based assessments.</li> <li>● Handling practices (PIs 2.2.2, 2.3.2): Indicators such as crowding intensity, brailing, or drop heights affect survival of discarded species and can inform habitat impact assessments.</li> <li>● Slaughter method and use of humane stunning (PIs 2.1.2, 2.2.2): While currently outside scope, inclusion here would align with best practice in responsible seafood production.</li> </ul>

	<ul style="list-style-type: none"> <li>● Transport conditions for live or retained animals (PIs 2.3.3, 2.4.3): Recording crowding, oxygenation, and duration of live transport informs both welfare and ecosystem outcome metrics.</li> </ul> <p>Even if welfare remains outside the current scope, MSC’s leadership could accelerate progress by highlighting fisheries and companies that adopt such reporting. This would align sustainability with welfare, meet growing consumer and corporate expectations, and complement emerging frameworks such as the MSWS and the Global Dialogue on Seafood Traceability’s Welfare Extension.</p>
<p><b>114935854975</b></p>	<p>Assuming stakeholders can be informed of use of RBF in the same stakeholder notification for the ACDR, this removes redundancy and reduces the number of emails to be sent/received.</p>
<p><b>114934751228</b></p>	<p>Strongly agree with this. It will create more work upfront, but it will reach more stakeholders and help the client understand the process. I have completed a few RBFs. I found it is difficult to engage stakeholders, and client has had some difficulty in understanding why they are failing prior to the meetings. I think providing the RBF in the ACDR draft will allow more stakeholders to engage, provide more transparency, and make the process easier to explain to the clients.</p>

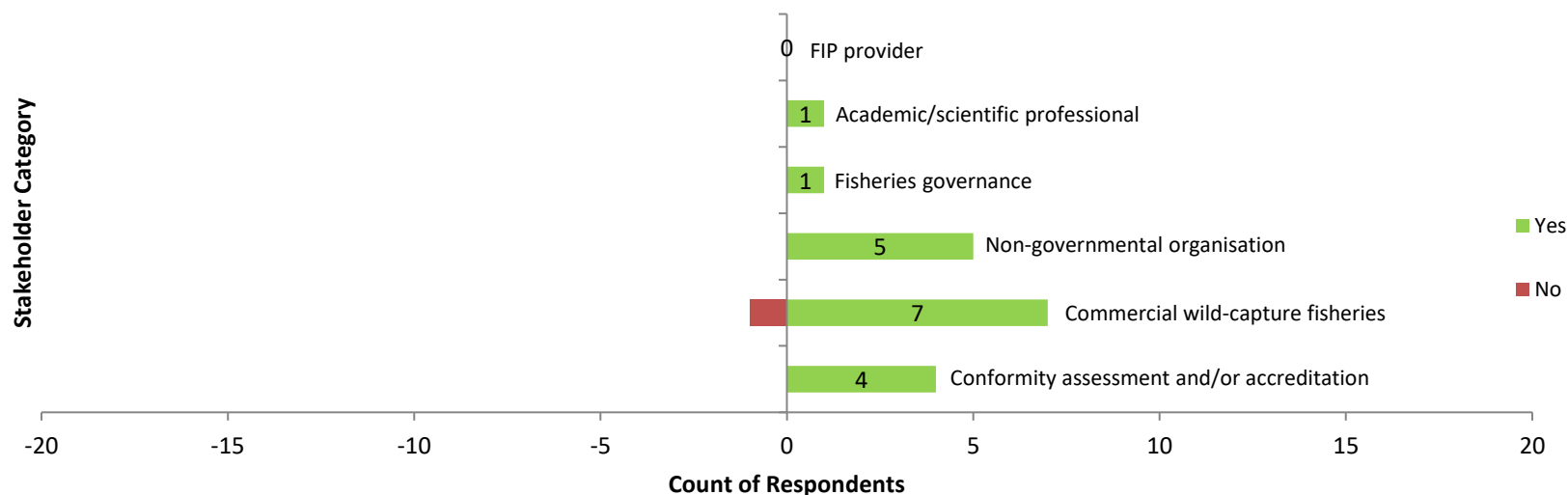
**If the RBF announcement is included within the Fishery Announcement, will it be sufficiently clear to stakeholders that the RBF will be used in the assessment?**



Feedback received		
Respondent ID	Stakeholder Category	Comments
114935854975	Conformity assessment and/or accreditation	Provided stakeholders are oriented to this change in notification by MSC ahead of time, they should be able to clearly determine RBF use from the announcement. (And if not oriented ahead of time, if they read the whole thing it should be clear. Perhaps there could be a 'RBF used yes/no' check box at the top of the template or elsewhere easily noticed?)
114931975029	Conformity assessment and/or accreditation	Yes removing duplication and multiple documents at announcement is a good idea!
114905584606	Conformity assessment and/or accreditation	Yes, This is something that CABs have been requesting at the tripartite for years. To ease some of the bureaucratic burden that we have to deal with daily.
114935985271	Commercial wild-capture fisheries	Echoing ASF's feedback on this point, we believe it will be clear that if the RNF announcement is included that the intent will be to use the RBF, noting that

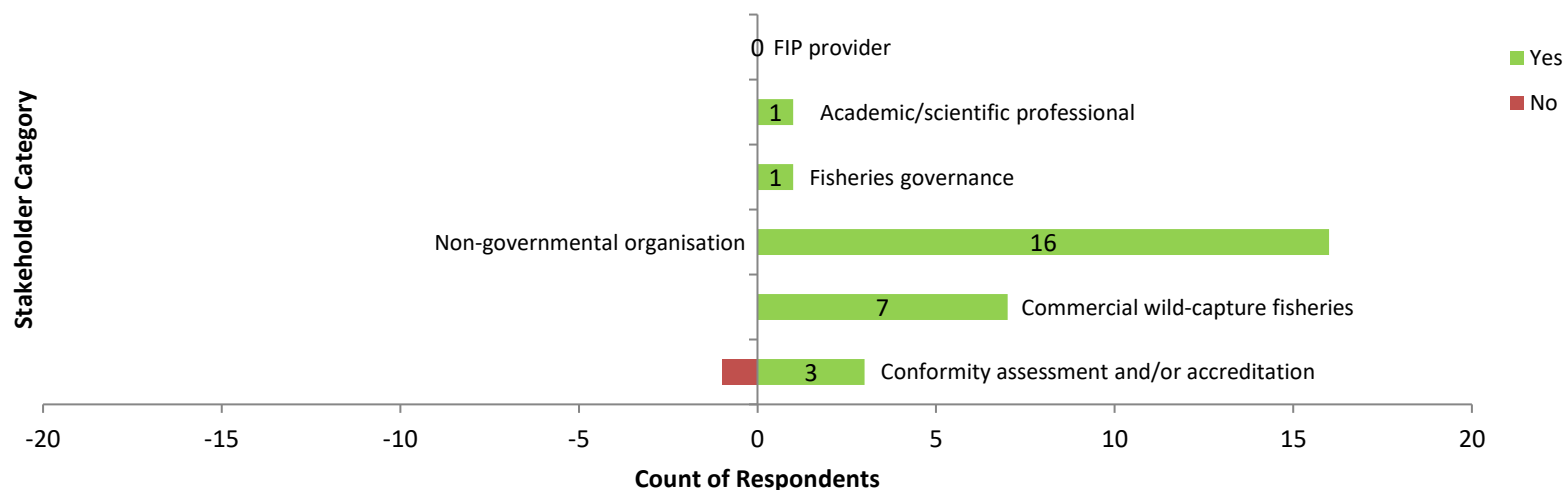
		A2.1.1.b allows for the RBF to be not used if information comes to light at the site visit. This also seems quite clear.
<b>114935328811</b>	Commercial wild-capture fisheries	We agree with and support the comments of the Association of Sustainable Fisheries.
<b>114935030286</b>	Commercial wild-capture fisheries	We believe it will be clear that if the RBF announcement is included that the intent will be to use the RBF, noting that A2.1.1.b allows for the RBF to be not used if information comes to light at the site visit. This also seems quite clear.

**If the RBF announcement is included within the Fishery Announcement, will this simplify the way stakeholders are notified about different components of a fishery assessment?**



Feedback received		
Respondent ID	Stakeholder Category	Comments
114934751228	Conformity assessment and/or accreditation	Probably yes overall, but I have found the issue with RBFs is getting expert researches to engage. I think the team will still need to reach out to some experts/stakeholders. However, I think the process will be easier if information is included in the ACDR.
114931975029	Conformity assessment and/or accreditation	I dont quite understand what this question is asking? which components are you referring too?
114935328811	Commercial wild-capture fisheries	We agree with and support the comments of the Association of Sustainable Fisheries.
114935030286	Commercial wild-capture fisheries	The ASF very much agrees with this statement.
114930258485	Commercial wild-capture fisheries	Assessors will probably have to contact relevant stakeholders for each fisheries where the RBF is used.

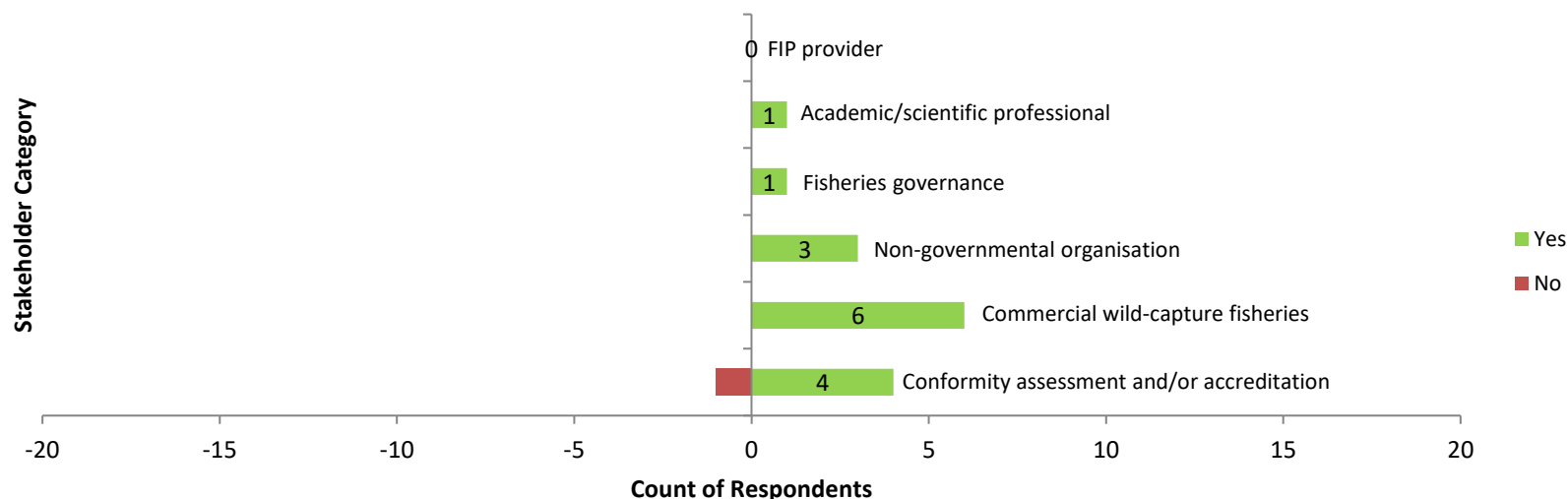
**Will the inclusion of information gaps and/or draft RBF scores in the Announcement Comment Draft Report help stakeholders better engage in the site visit?**



Feedback received		
Respondent ID	Stakeholder Category	Comments
114935854975	Conformity assessment and/or accreditation	Improves process of information gathering and filling gaps.
114934751228	Conformity assessment and/or accreditation	In general my experience with RBFs have had low engagement overall. I'm not sure how much it will help including the information in the ACDR, but I like it because it is another way to allow for engagement.
114931975029	Conformity assessment and/or accreditation	At present the way RBF information is shared is very different between CABs and teams, simplifying the process is good
114905584606	Conformity assessment and/or accreditation	Not sure because it might double the experts workload
114935328811	Commercial wild-capture fisheries	We agree with and support the comments of the Association of Sustainable Fisheries.

<b>114935030286</b>	Commercial wild-capture fisheries	Again, we support these changes.
<b>114930258485</b>	Commercial wild-capture fisheries	ACDRs are very long documents, so these elements should be placed in a separate section to ensure that stakeholders can access them more easily.
<b>114899462711</b>	Non-governmental organisation	It will improve clarity and transparency, but it will not change stakeholder participation per se. Regarding the information included in the ACDR, it should both identify data gaps and provide draft scores—clearly indicating the methodology used. It should not be one or the other, as different PIs will have varying levels of available information.

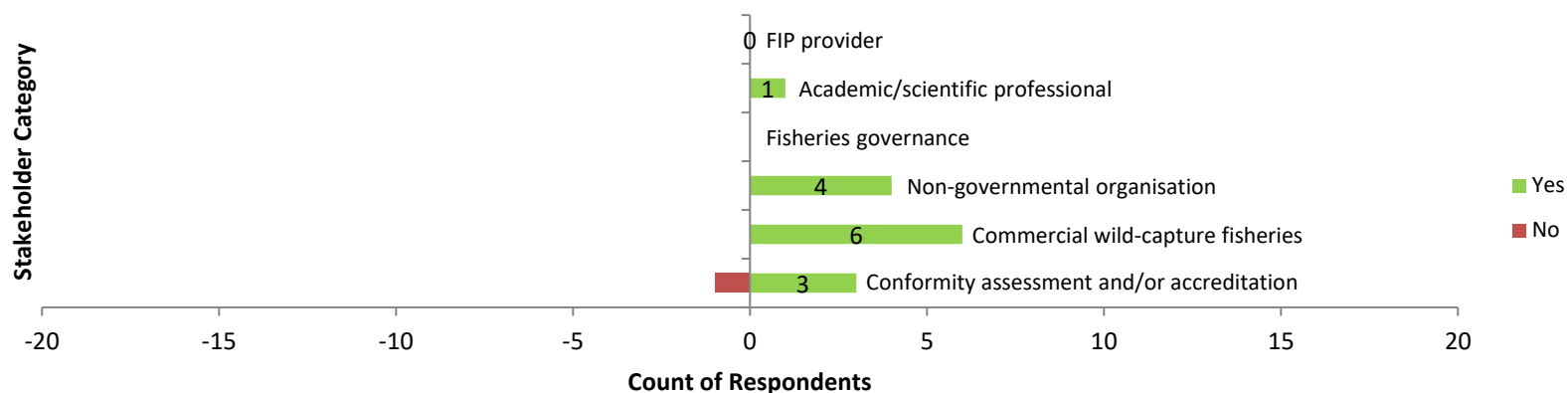
Is it practical for the assessment team to gather the information required in A2.2 before the fishery announcement rather than before the site visit?



Feedback received		
Respondent ID	Stakeholder Category	Comments
114935854975	Conformity assessment and/or accreditation	The information can almost always be found in the literature or in databases such as FishBase.
114926520123	Conformity assessment and/or accreditation	Before the fishery announcement, it may not be practical to obtain information on bycatch mitigation strategies, the distribution of fishing effort within the jurisdictional boundaries of the UoA, the distribution of all fishing effort on the target stock outside the UoA. The extent of information clients need to provide is often challenging
114931975029	Conformity assessment and/or accreditation	We do this anyway sometimes and further front loading the ACDR helps along the track (most of the time!)
114905584606	Conformity assessment and/or accreditation	I am not sure about the practicality of this change as it would require to double the work in some of the RBF cases

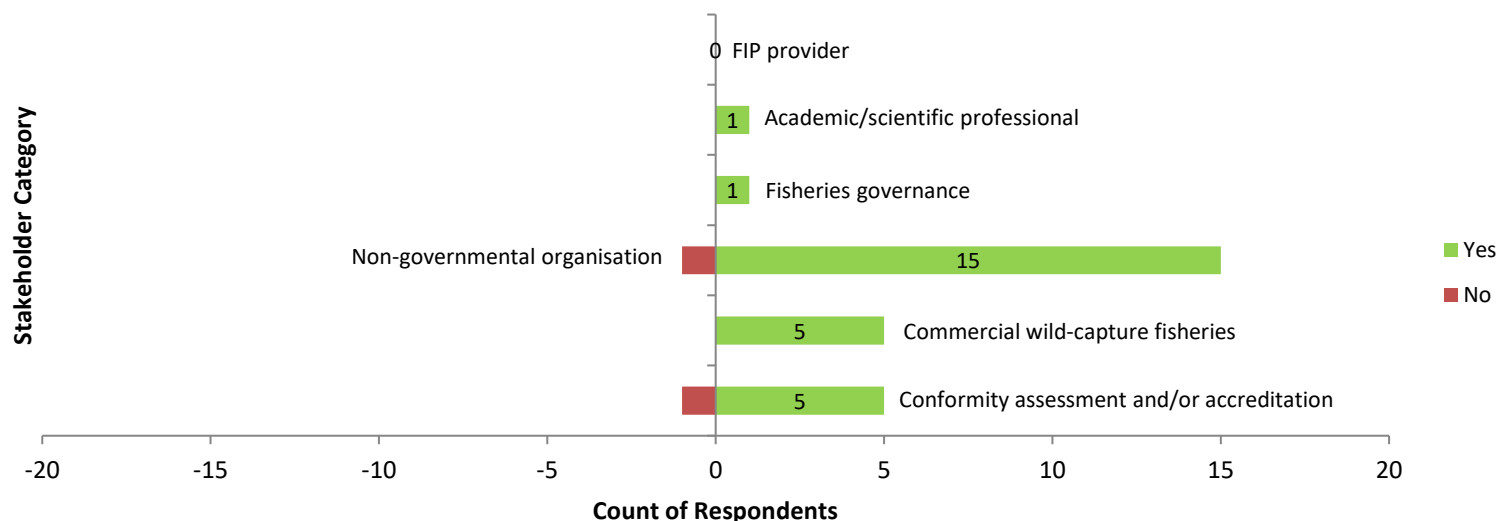
<b>114935985271</b>	Commercial wild-capture fisheries	This is likely fishery-dependent, but we generally agree with ASF's feedback on this point regarding provisions of A2.2.4 allowing for the identification and announcement of information gaps.
<b>114935328811</b>	Commercial wild-capture fisheries	We agree with and support the comments of the Association of Sustainable Fisheries.
<b>114935030286</b>	Commercial wild-capture fisheries	In the main, we believe it will be possible to gather the information as required. In circumstances where it is not fully possible, we note the provisions of A2.2.4 allow for the identification and announcement of information gaps.
<b>114899462711</b>	Non-governmental organisation	For fisheries already certified, that is what they usually do anyways.

## Are the revised requirements in A2.2.4 practical?



Respondent ID	Stakeholder Category	Comments
114935854975	Conformity assessment and/or accreditation	[Noting that i. should probably be 'b' since the 'or' statement should be two options on the same outline level.] I think we would select option b more often than a and question whether a is really necessary.
114931975029	Conformity assessment and/or accreditation	I would go for a hybrid of option B and option A - Provide background information and draft scores using the applicable methodology (CA, PSA, CSA, SICA), where possible, and identify any data gaps.  That would better align with how we score PIs - we score the PIs on the best information we have at ACDR and identify any data gaps. MSC should allow for some attributes to be left unscored if the team cannot score these. I don't like the idea of scoring all attributes on limited data at the ACDR stage as you'd score conservatively and then the draft scores may be difficult to amend /change later
114935328811	Commercial wild-capture fisheries	We agree with and support the comments of the Association of Sustainable Fisheries.
114935030286	Commercial wild-capture fisheries	The ASF thinks this is a good change, thank you.
114899462711	Non-governmental organisation	And as I suggested above, both types of information SHALL be included.

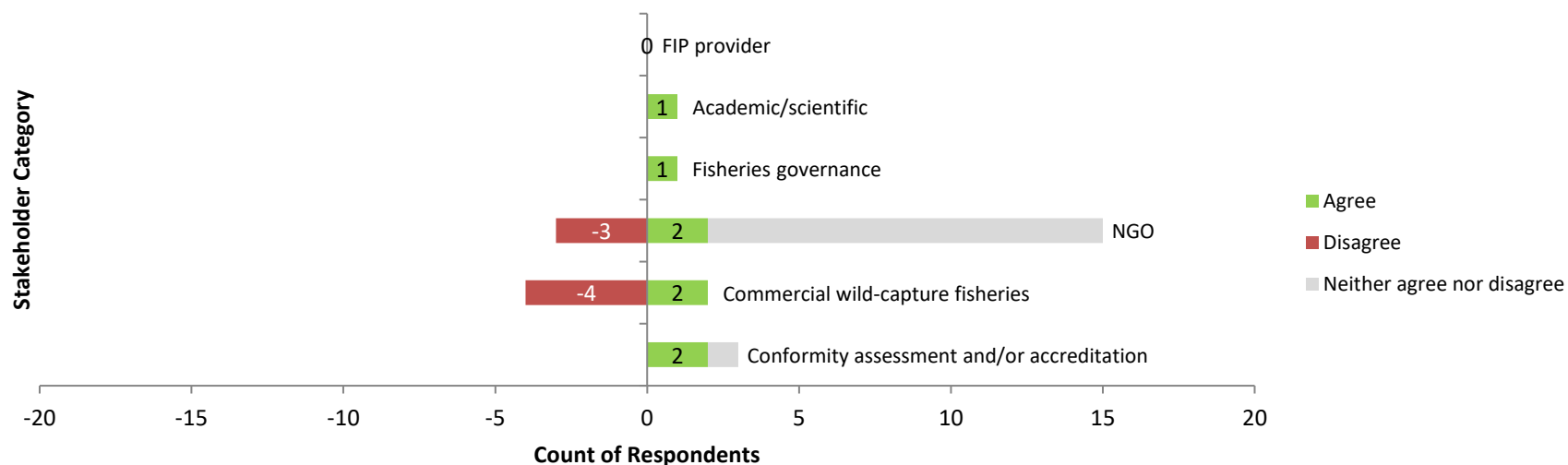
**Is it practical for stakeholders to provide information on the productivity of a species to assist the assessment team in scoring as per A4.2.1.b?**



Respondent ID	Stakeholder Category	Comments
114926520123	Conformity assessment and/or accreditation	It may depend on the stakeholders who are engaged, or able to be engaged.
114931975029	Conformity assessment and/or accreditation	of course, but the final decision should rest with the team
114935985271	Commercial wild-capture fisheries	Again, this likely varies by fishery. We can envision cases where information provided by a stakeholder conflicts with information collected by managers, or cases where stakeholders misinterpret information collected by fishery managers to arrive at different conclusions. We believe that information provided by stakeholders on species productivity should be taken with a grain of salt by CABs and similarly strictly evaluated for independence and bias by the CAB.
114935328811	Commercial wild-capture fisheries	We agree with and support the comments of the Association of Sustainable Fisheries.

114935030286	Commercial wild-capture fisheries	Yes – we note we are advised that, whilst unusual, there are occasions when stakeholders have identified updated or better information on productivity during an RBF consultation to update a PSA.
114899462711	Non-governmental organisation	Some stakeholders should be knowledgeable on specific topics. The assessment team shall review all information based on the objectivity criteria discussed under ERF.

**"The addition of the optional requirements in A5.2 provide a clear pathway to adjust scoring element scores determined during the PSA, if required."**



Respondent ID	Stakeholder Category	Comments
114935854975	Conformity assessment and/or accreditation	Clear, though time consuming when the number of RBF elements is high, as indicated for some pilot purse seine fisheries.
114934751228	Conformity assessment and/or accreditation	Species that trigger RBF are often data deficient. It might work in some instances, where there is some information.  However, I am unsure how this would work given most RBF species are data

		<p>deficient. It would not meet criteria A5.2.1 a or b since it is data deficient. It would also be unlikely that there is information alliable on the the intrinsic rate of population increase directly for the unit in question. For example Pygmy Killer whale in the WCPO. Would it be acceptable to use proxy intrinsic rate estimates in this case? For example NOAA assumed it to be 4% for Pygmy killer whale in the gulf of Mexico based on general cetacean modeling.</p> <p>CURRENT AND MAXIMUM NET PRODUCTIVITY RATES Current and maximum net productivity rates are unknown for this stock. For purposes of this assessment, the maximum net productivity rate was assumed to be 0.04. This value is based on theoretical modeling showing that cetacean populations may not grow at rates much greater than 4% given the constraints of their reproductive history (Barlow et al. 1995).</p>
<b>114935220378</b>	Conformity assessment and/or accreditation	<p>Should b (There is information indicating that the population size is greater or equal to 5000</p> <p>mature individuals) be restricted to ETP/OOS species? c (There is information indicating that the UoA fishing mortality is below the intrinsic rate of population increase.) would be clearer if supported by an explanation on the types of information that are permissible here. Other than that, I agree with the changes proposed.</p>
<b>114931975029</b>	Conformity assessment and/or accreditation	Note - Shouldn't A5.4.3 include the need to report on A5.2 Residual Risk Analysis?
<b>114935985271</b>	Commercial wild-capture fisheries	<p>We echo ASF's feedback on this point: "The ASF feels the revisions here add a huge amount of unhelpful complexity to the RBF process, and represent a very high bar to entry that most fisheries will not reach (noting that is very unclear why the RBF would be used if the entry criteria in A5.2.1 are met).</p> <p>In essence, the modifications attempt to fix a problem by a post-hoc manipulation of the outcome, when we would advocate strongly that adjusting the RBF scoring calculations to allow fisheries to pass where susceptibility is appropriately low would be far more appropriate. As such, we do not support the changes.</p>

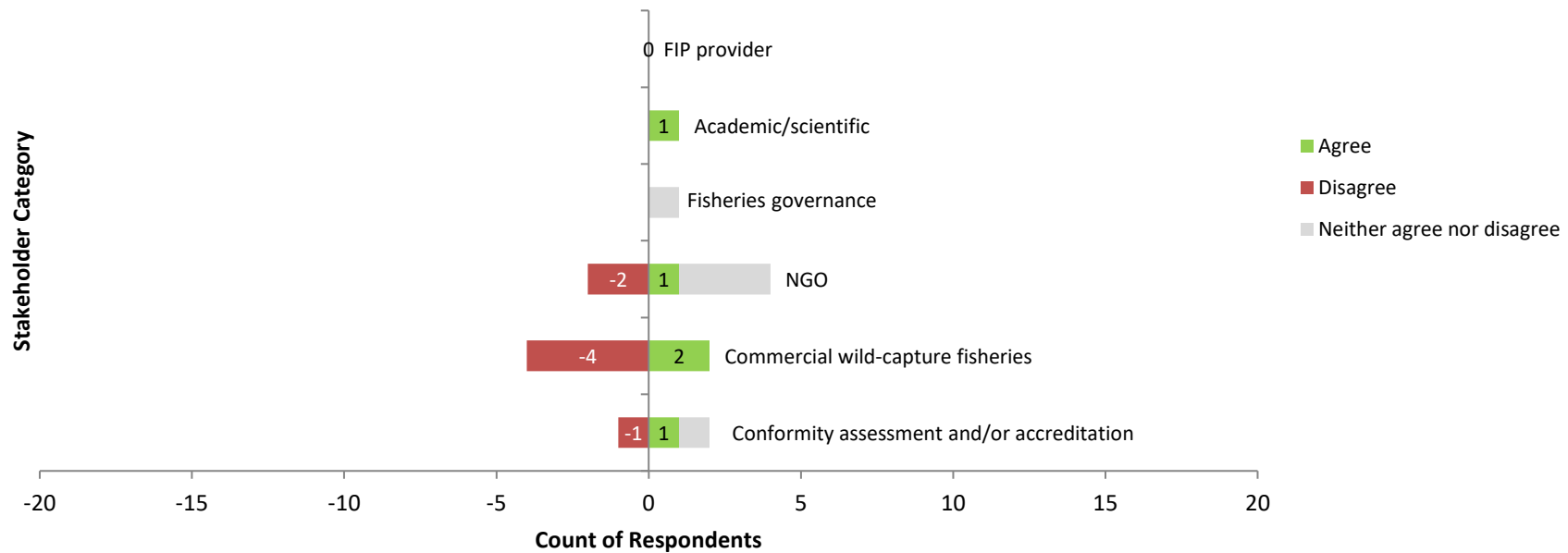
	<p>If the RBF calculations are not revised to allow for passes normally, we would instead strongly advocate for either additional training for assessors under the existing approach to modification, or to greatly simplify the approach by allowing additional points to be awarded where appropriate (e.g., +10 where the 2.2.2.a (UoA-specific management) and 2.2.3.a (UoA-specific information) =80, and +20 where management = 100 and information = 80). With the exception of a species that scored &lt;60 overall (of which we believe there are few that are not well known, and are therefore most likely to be scored conventionally), this should always allow a fishery to meet a condition on species scored by RBF by demonstrating there is adequate information available and by delivering a 100 management score (i.e, a ‘strategy’ for in-scope species or a ‘comprehensive strategy’ for ETP/OOS)."</p>
<p><b>114935328811</b> Commercial wild-capture fisheries</p>	<p>We agree with and support the comments of the Association of Sustainable Fisheries.</p>
<p><b>114935030286</b> Commercial wild-capture fisheries</p>	<p>The ASF feels the revisions here add a large amount of unhelpful complexity to the RBF process, with a very high bar to entry that most fisheries will not reach (noting that is unclear why the RBF would be used if the entry criteria in A5.2.1 are met).</p> <p>In essence, the modifications attempt to fix a problem (outcome scores that are below 80 even with very low or near absent susceptibility) through a post-hoc manipulation of the outcome, when we would advocate strongly that adjusting the underlying RBF scoring calculations to allow fisheries to pass where susceptibility is low would be far more appropriate. As such, we do not support the changes.</p> <p>Without adjusting the underlying RBF calculations to allow for passes, we suggest that it would be better to provide additional training for assessors under the existing approach to modification (as well as allowing a larger adjustment to account for scores of &lt;70).</p> <p>Alternatively, the approach could be greatly simplified by allowing additional points to be awarded where appropriate (e.g., +10 where the 2.2.2.a (UoA-specific management) and 2.2.3.a (UoA-specific information) = 80, and +20 where management = 100 and information = 80). With the exception of a</p>

	<p>species that scored &lt;60 overall (of which we believe there are few that are not well known, and are therefore most likely to be scored conventionally), this should always allow a fishery to meet a condition on species scored by RBF by demonstrating there is adequate information available and by delivering a 100 management score (i.e., a 'strategy' for in-scope species or a 'comprehensive strategy' for ETP/OOS).</p> <p>Nevertheless, the overall complexity of these post-hoc solutions and the possible appearance of being a 'fix', suggest that a means of avoiding the need for such an approach in the first place would be a much better way out of the problem.</p>
<p><b>114935742704</b> Non-governmental organisation</p>	<p>We are concerned about the lack of a clear definition for "intrinsic rate of population increase" within the Standard, specifically for ETP species. If this is inaccurately identified, and/or if the cumulative impacts of both MSC-certified and non-certified fisheries on that rate of population are not accurately accounted for, then this could have a disproportionate impact on ETP species that often have low population growth rates and are vulnerable to impacts.</p>
<p><b>114935680642</b> Non-governmental organisation</p>	<p>The addition of the optional requirements in A5.2 might provide a clearer pathway to adjust scoring element scores determined during the Productivity Susceptibility Analysis (PSA).</p> <p>However, despite its improved clarity as a procedural pathway, concerns exist that the Residual Risk Assessment process (RRA) insufficiently account for cumulative impacts.</p> <p>This is particularly the case in regard to A5.2.1.c ("There is information indicating that the UoA fishing mortality is below the intrinsic rate of population increase"). Under a scenario where Fishery-A UoA bycatch impact is below the intrinsic rate of Seabird population X – for instance 50% of it -, it does not account for the impact of other Fisheries on Seabird population X – e.g. Fishery-B and Fishery-C also impacting 50% of population X intrinsic rate. This cumulative impact can rapidly exceed the Intrinsic rate of population increase of a species, and we are concerned that the current MSC Standard and its' RBF/PSA and RRA tools insufficiently account for it. At fishery's level, the bycatch of few Endangered individuals a year might be seen as "negligible", but the cumulative impact can rapidly affect a species' chances to recovery, if not survival [this comment thus also applies to the definition of "negligible" under the</p>

	<p>MSC Standard 3.1v].</p> <p>This means a fishery's scoring could be increased via the RRA, even if collective impacts from different fisheries (including the one in assessment) are driving endangered species towards extinction (e.g. surpassing the intrinsic rate of population increase). This systemic flaw can disproportionately affect low-productivity species such as seabirds, potentially undermining the overall integrity of the certification by not reflecting true ecological risk.</p>
<p><b>114935583787</b> Non-governmental organisation</p>	<p>Adding the optional requirements in A5.2 might provide a clearer way to adjust the scores of the scoring elements determined during the Productivity Susceptibility Analysis (PSA).</p> <p>However, despite the procedural pathway's improved clarity, concerns exist that the Residual Risk Assessment (RRA) process insufficiently accounts for cumulative impacts.</p> <p>This is particularly true regarding A5.2.1.c ("There is information indicating that the UoA fishing mortality is below the intrinsic rate of population increase"). In a scenario where the bycatch impact of Fishery A on UoA is below the intrinsic rate of Seabird population X, for example, 50%, the RRA does not account for the impact of other fisheries on Seabird population X. For instance, Fisheries B and C also impact 50% of the intrinsic rate of Seabird population X. This cumulative impact can rapidly exceed a species' intrinsic rate of population increase, and we are concerned that the current MSC Standard and its RBF/PSA and RRA tools do not sufficiently account for it. At the fishery level, the bycatch of a few endangered individuals per year may be considered "negligible," but the cumulative impact can quickly affect a species' chances of recovery or even survival. This comment also applies to the definition of "negligible" under MSC Standard 3.1v.</p> <p>This means a fishery's score could increase via the RRA even if the collective impact of different fisheries (including the one under assessment) drives an endangered species toward extinction (e.g., surpassing the intrinsic rate of population increase). This systemic flaw can disproportionately affect low-</p>

		productivity species, such as seabirds, potentially undermining the overall integrity of the certification process by failing to reflect true ecological risk.
<b>114935402174</b>	Non-governmental organisation	The optional requirements in A5.2 clarify how to adjust scores from the Productivity Susceptibility Analysis (PSA), but the Residual Risk Assessment (RRA) does not adequately account for cumulative impacts from multiple fisheries. For example, even if one fishery's bycatch is below a seabird population's intrinsic growth rate, impacts from other fisheries can collectively exceed it, threatening recovery or survival. This could allow a fishery to score well under the RRA despite contributing to population-level risks, particularly for low-productivity species, undermining the MSC Standard's ecological credibility.
<b>114935537358</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114935463463</b>	Non-governmental organisation	114935463463 disagrees. While replacing the current ad-hoc "+10" adjustment with a structured Residual Risk Analysis (RRA) is a step toward auditability, the proposed pathway is still too weak and risks being used mainly to raise scores without equivalent precautionary safeguards. Clearer, stricter, and binding criteria are needed to ensure adjustments cannot override uncertainty or allow inappropriate score increases for ETP/OOS species.
<b>114935167081</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114935145363</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114934996080</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114934471709</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114933972264</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114899462711</b>	Non-governmental organisation	I agree in the use of "residual risk assessment", section A5.2. But I consider this should be mandatory, not optional. The assessment team, after estimating the PSA, MUST assess if the fishery qualifies (under A5.2.1) for a residual risk assessment process.

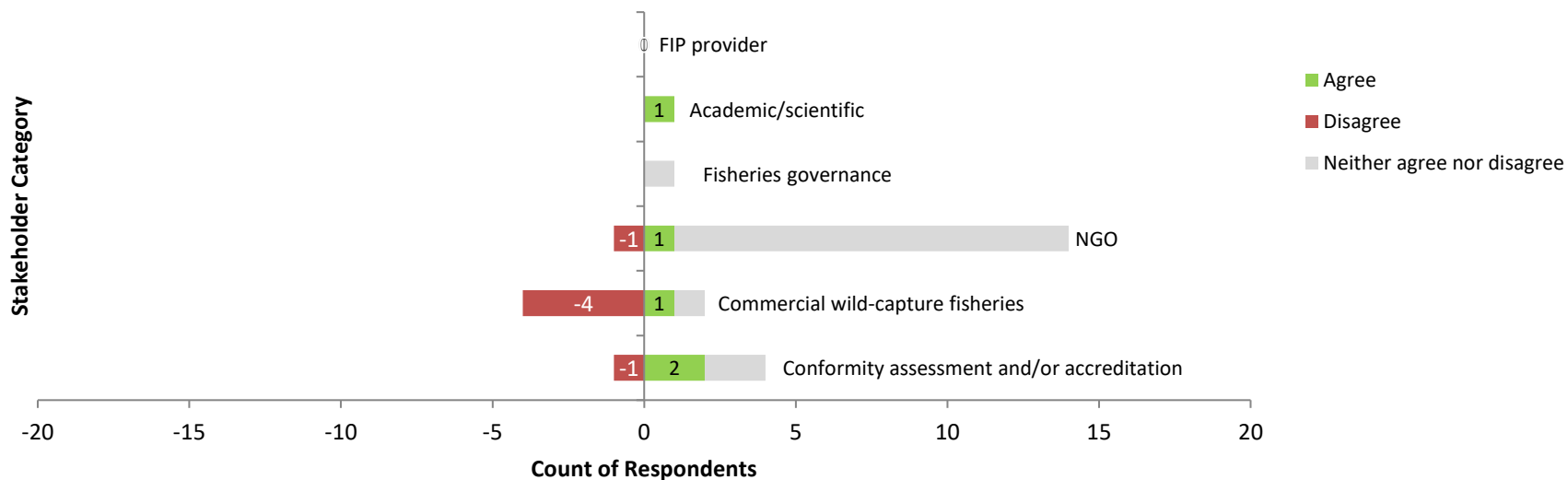
**"The requirements in A5.2 are achievable by most fisheries within a 5-year period."**



Respondent ID	Stakeholder Category	Comments
114931975029	Conformity assessment and/or accreditation	<p>No. The fisheries may have very little ability to achieve A5.2.1 as these requirements are out of their control. They may have 1 or 2 interactions per 5 years in some instances (examples recently from the failing v3.1 fisheries) and no ability to show population increase. thus rendering the remainder of A5.2 void. In my opinion A5.2.1 could be removed entirely. I would like to see examples where the MSC justification in the guidance ' where the fishery is having a negative consequence on the population of a species, even with an effective management strategy in place.' is derived from. I imagine this is from Northern Right whales or such, and if so i think these 'extreme' examples are being used to set bars in the standard which for the majority of species / gear interactions cannot be achieved.</p> <p>Its unclear why for a score of 80 using A5.2 that you need to achieve the</p>

		<p>equivalent of SG100 for PI 2.1.2, SI b and PI 2.1.2, SI c in Table X? i would think the best practice (SG80) approach of 2.1.2b and 2.1.2c would be sufficient to allow raising the scores to maximum of 80 via A5.2. Please bear in mind these may include in-scope target species not OOS's. In Table Y the same criticism applies for PI 2.2.2, SI c SG100, why is SG80 equivalent not enough.</p> <p>For the reasons above i do not think A5.2 is achievable and more work is required from MSC.</p>
<b>114935985271</b>	Commercial wild-capture fisheries	We do not think the requirements are achievable within 5 years – the entry criteria alone are difficult to achieve and are simply unreachable for some species.
<b>114935328811</b>	Commercial wild-capture fisheries	We agree with and support the comments of the Association of Sustainable Fisheries.
<b>114935030286</b>	Commercial wild-capture fisheries	The ASF does not think the requirements are achievable within 5 years – the entry criteria in A5.2.1 alone are difficult and potentially very costly to achieve, and are simply unreachable for some species.
<b>114935713917</b>	Non-governmental organisation	We are not sure things such as population size etc., would show noticeable changes within 5 years.
<b>114935463463</b>	Non-governmental organisation	114935463463 disagrees. Demonstrating the criteria in A5.2 will not be feasible for many data-limited or small-scale fisheries.
<b>114899462711</b>	Non-governmental organisation	It is "highly" probably that they will. If the MSC FS v.3.1 is implemented in 2028-2030, then it should be.

**"The requirements in A5.2 improve the accessibility of the MSC Program to fisheries."**



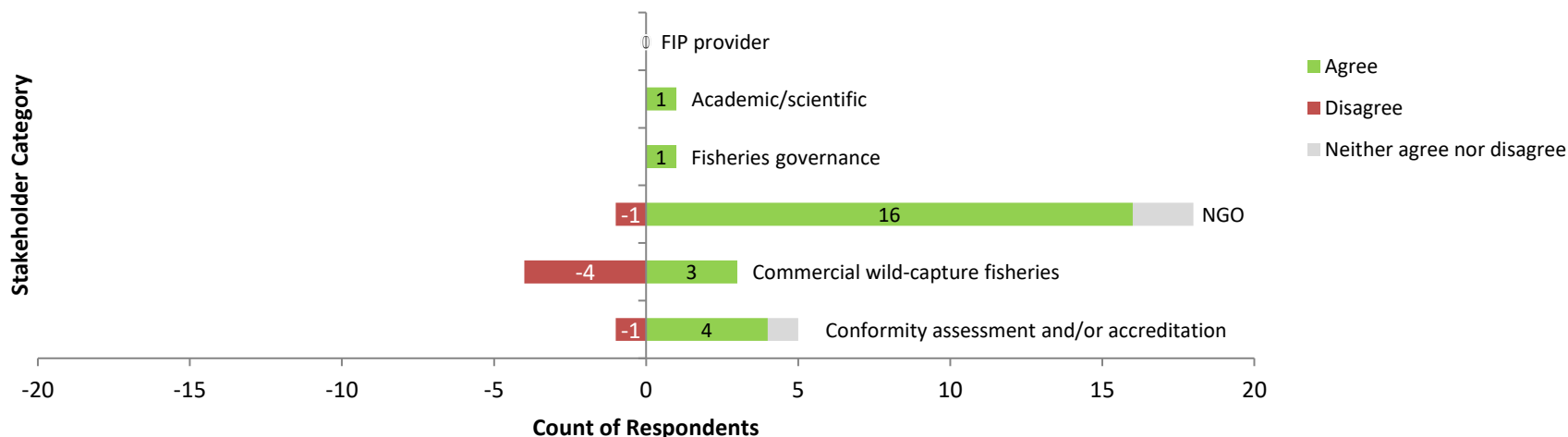
Respondent ID	Stakeholder Category	Comments
114935854975	Conformity assessment and/or accreditation	Conducting the RBF will still be time-consuming and expensive, and while this may improve outcome for fisheries at the end of the first certificate lifespan (i.e., 80 can be met) we can't say whether this will improve accessibility.
114931975029	Conformity assessment and/or accreditation	<p>The RBF will become default for a huge suite of species due to the lack of FCS in the majority of populations globally. The tuning of the v3.0 RBFs is such that scores of 80 are seemingly impossible for most species without A5.2 and for the reasons given in above for #52 response i do not believe A5.2 changes anything.</p> <p>I also wish to point out that the productivity values in the v3.x RBF have been codified correctly. Having only 2 productivity attributes for some species types overweights these scores overall. I remain concerned that the Interbirth intervals (IBI) assigned in the cetacean Productivity tables do not accurately reflect the scale of IBI in these species. Bottlenose dolphins a representative of the smaller cetaceans with high birth rates have 1/IBIs of &lt;0.23 (<a href="https://esajournals.onlinelibrary.wiley.com/doi/am-pdf/10.1002%2Fecs2.1796">https://esajournals.onlinelibrary.wiley.com/doi/am-pdf/10.1002%2Fecs2.1796</a> )</p>

		<p>thus score 3 in table A11. It would appear the boundaries set for this attribute do not reflect possible outcomes for this species group.</p> <p>Further work is needed throughout RBF for it to be an effective tool. MSC should also consider the FCS requirements also. As previously raised (and i know this is out of context but i wish it to be on record again) FCS values for fish at 50% of B0 makes no sense, and is almost never used in fisheries management why not 40% of B0 = MSY.</p>
<b>114935985271</b>	Commercial wild-capture fisheries	The entry requirements and thresholds for performance are so high that this will only be accessible for very high performing fisheries – we do not see that the improve accessibility at all.
<b>114935328811</b>	Commercial wild-capture fisheries	We agree with and support the comments of the Association of Sustainable Fisheries.
<b>114935030286</b>	Commercial wild-capture fisheries	The ASF believes the entry requirements and thresholds for performance within Tables X and Y are so high that this will only be accessible for very high performing fisheries – we do not see that this will improve accessibility at all.
<b>114935680642</b>	Non-governmental organisation	<p>We would agree that the requirements in A5.2 improve the accessibility of the MSC Program to fisheries overall.</p> <p>However, this improved accessibility also comes with a notable concern: the RRA insufficiently accounts for cumulative impacts (especially around the species “intrinsic rate of population increase”) from multiple fisheries, that are MSC certified or not.</p> <p>While a single fishery's impact might be below a species' intrinsic rate of population increase, allowing for a score adjustment under A5.2, the collective impacts from all fisheries could still drive endangered species, particularly low-productivity seabirds, towards extinction. Therefore, while A5.2 enhances individual fisheries' ability to achieve certification, this could lead to the MSC certifying fisheries that, in a broader context, contribute to significant conservation issues.</p> <p>We think that the criteria allowing the assessors to “modify the scoring element score where at least one following are met” at A5.2.1 is too generous and should be strengthened. RRA should only be triggered if all of the 3 criteria are met, not just one, and that cumulative impacts are clearly being acknowledged and considered.</p>

<b>114935583787</b>	Non-governmental organisation	<p>Overall, I agree that the requirements in A5.2 improve the MSC Program's accessibility to fisheries.</p> <p>However, this improved accessibility raises a significant concern: the RRA does not adequately account for the cumulative impact of multiple fisheries, both MSC-certified and non-certified, on the intrinsic rate of population increase of species.</p> <p>While the impact of a single fishery might be below a species' intrinsic rate of population increase and allow for a score adjustment under A5.2, the collective impact of all fisheries could drive endangered species, particularly low-productivity seabirds, toward extinction. Therefore, although A5.2 improves individual fisheries' ability to achieve certification, it could result in the MSC certifying fisheries that contribute to significant conservation issues in a broader context.</p> <p>I believe the criteria allowing assessors to modify the scoring element score when at least one of the following conditions is met at A5.2.1 is too generous and should be strengthened. The RRA should only be triggered if all three criteria are met, and cumulative impacts should be clearly acknowledged and considered.</p>
<b>114935402174</b>	Non-governmental organisation	<p>While A5.2 improves MSC certification accessibility for individual fisheries, it raises concerns because the Residual Risk Assessment (RRA) does not adequately account for cumulative impacts from multiple fisheries. Even if a single fishery's impact is below a species' intrinsic population growth rate, combined effects could still threaten low-productivity or endangered species. The current criteria in A5.2.1 for adjusting scores are too permissive; score modifications should only occur when all three conditions are met, ensuring cumulative impacts are properly considered.</p>
<b>114935537358</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114935463463</b>	Non-governmental organisation	<p>114935463463 disagrees. Accessibility should not come from lowering precautionary standards. By enabling score increases through optional RRA, A5.2 risks certifying fisheries with insufficient information or weak monitoring. Accessibility should instead be achieved through capacity building, better data collection, and technological tools (e.g. electronic monitoring), not through relaxed scoring adjustments.</p>
<b>114935167081</b>	Non-governmental organisation	Duplicate of 114935680642

<b>114935145363</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114934996080</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114934471709</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114933972264</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114899462711</b>	Non-governmental organisation	It creates space for improvement, but in many cases, the impacts on ETP/OOS species occurred in the past or in distant-water fisheries. Local fishers are often left to manage the consequences, despite having played no role in causing them.

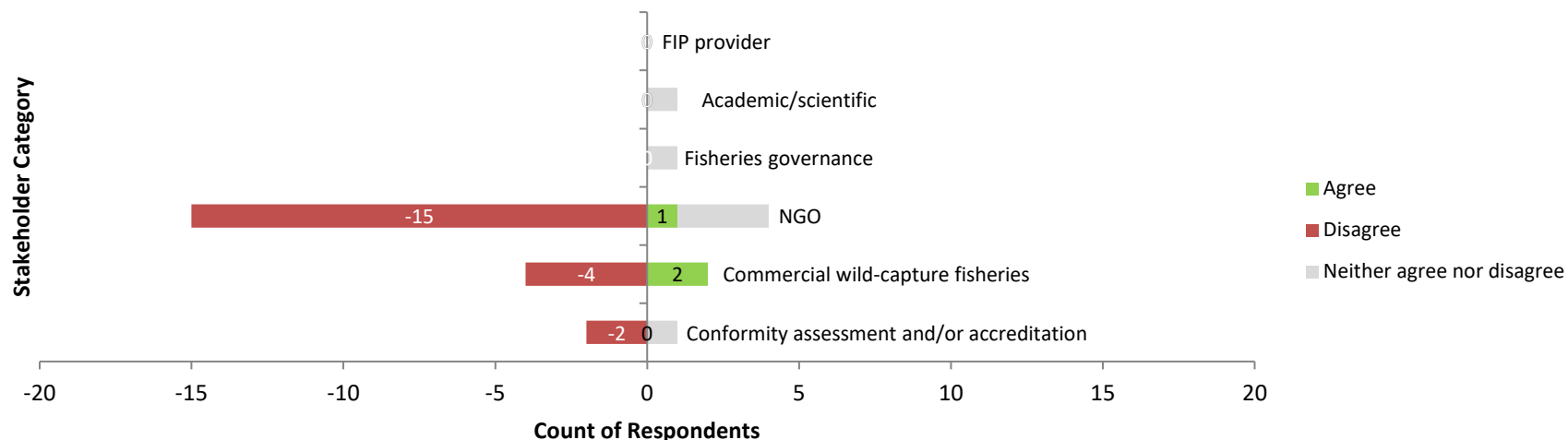
**"Information on population status should be considered when deciding whether the adjustment of scoring element scores can be applied."**



Respondent ID	Stakeholder Category	Comments
114935854975	Conformity assessment and/or accreditation	Though note that often information available is outdated and not specific to the local population(s) impacted by the UoA.
114935220378	Conformity assessment and/or accreditation	The previous version of these requirements were more explicit on what was expected in terms of population status. I am still of the opinion that those requirements were a major impediment to the feasibility of the adjustment tool so was pleased to see they have been replaced by the requirements under A5.2.1 - I do think some finetuning is still needed, but it is a significant improvement already.
114931975029	Conformity assessment and/or accreditation	see answers above for #52
114935985271	Commercial wild-capture fisheries	Like ASF, we disagree, in that the point of the RBF is to allow fisheries to be scored where information on population status may not be available. We feel this adds an unreasonable burden, and means the RBF cannot deliver its intent.

<b>114935328811</b>	Commercial wild-capture fisheries	We agree with and support the comments of the Association of Sustainable Fisheries.
<b>114935030286</b>	Commercial wild-capture fisheries	The ASF disagrees, in that the point of the RBF is to allow fisheries to be scored where information on population status may not be available. We feel this adds an unreasonable burden, and means the RBF cannot deliver its intent.
<b>114935742704</b>	Non-governmental organisation	At this point in time, we do not support the adjustment of scoring element scores based on information on population status. This is because key definitions are not included in the Standard (e.g., intrinsic rate of population increase) and the fact that non-MS-C-certified fishery impacts are not included as part of the cumulative impacts assessment. This could result in disproportionately negative impacts for ETPs species.
<b>114935713917</b>	Non-governmental organisation	This should only be used if the information on population status is robust.
<b>114899462711</b>	Non-governmental organisation	Yes, but the mechanism for determining population status should be flexibly.

**"The proposed population status criteria in A5.2.1.a to A5.2.1.c are appropriate."**



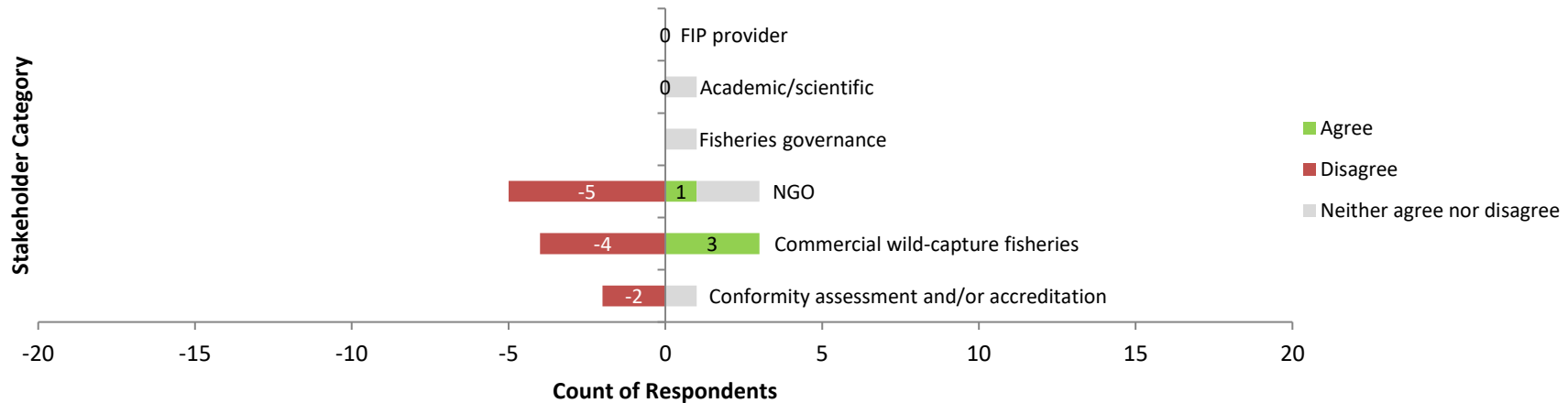
Respondent ID	Stakeholder Category	Comments
114935854975	Conformity assessment and/or accreditation	There are so many instances where the term “population” for a wide-spread or highly migratory species is problematic. Do we mean the global population? Or local? Not every in-scope or ETP/OOS species will have stock identification and status information readily available to assess these requirements.
114934751228	Conformity assessment and/or accreditation	The criteria is likely not going to be met for data deficient species. Some are commonly occurring and likely have healthy populations while others likely have drastically reduced numbers. The criteria is appropriate for DD species with know population crashes, but less so for DD species that are commonly occurring.
114926520123	Conformity assessment and/or accreditation	They seem okay though.
114935220378	Conformity assessment and/or accreditation	Please see my comments under question 51.
114931975029	Conformity assessment and/or accreditation	see answers above for #52

<b>114935985271</b>	Commercial wild-capture fisheries	We disagree that the criteria are appropriate. Specifically, we question why the RBF would need to be used if these criteria are met.
<b>114934879929</b>	Commercial wild-capture fisheries	although i would stay away from prescriptive numbers of individuals (as in A5.2.1 b = "5000 mature individuals")
<b>114935328811</b>	Commercial wild-capture fisheries	We agree with and support the comments of the Association of Sustainable Fisheries.
<b>114935030286</b>	Commercial wild-capture fisheries	As noted previously, the ASF disagrees that the criteria are appropriate. Specifically, we question why the RBF would need to be used if these criteria are met.
<b>114935742704</b>	Non-governmental organisation	See above comments about concerns about a lack of definition, and in some cases the existence of reliable data, on "intrinsic rate of population increase". Also note concerns about cumulative impacts of non-MS-Certified fisheries.
<b>114935680642</b>	Non-governmental organisation	A5.2.1.c should account for cumulative impact of the UoA fishing mortality and other fisheries (especially MSC involved) on the ETP/OOS unit. And all three criteria should be met prior to being able to trigger the RRA.
<b>114935713917</b>	Non-governmental organisation	We do not support a and c as these would not apply to many ETP/OOS species, and we do not think this information would be available for many species.
<b>114935583787</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114935402174</b>	Non-governmental organisation	A5.2.1.c should consider the cumulative impact of the UoA's fishing mortality alongside other fisheries (particularly MSC-certified ones) on the Endangered Threatened and Protected an/or Out of Scope species. Furthermore, the RRA should only be triggered when all three criteria are satisfied.
<b>114935537358</b>	Non-governmental organisation	Duplicate of 114935680642

<b>114935463463</b>	Non-governmental organisation	<p>114935463463 disagrees. The proposed criteria are not appropriate and should be revised substantially. In particular:</p> <p>A5.2.1.b (<math>\geq 5,000</math> mature individuals): This threshold is arbitrary, misapplied from IUCN Red List criteria, and has no biological meaning when used in isolation. IUCN criteria always consider population size in combination with decline rates, fragmentation, and other factors. Many ETP/OOS species (e.g., mako sharks, albatrosses, turtles) have populations far larger than 5,000 but remain Vulnerable or Endangered due to steep declines and bycatch mortality. Conversely, some species naturally exist in smaller populations. Applied in MSC scoring, this criterion would allow fisheries to raise PSA scores for species still at serious conservation risk. It should be deleted.</p> <p>A5.2.1.c (fishing mortality <math>&lt;</math> intrinsic rate of population increase): This is also inappropriate. For low-productivity species (e.g., many sharks, seabirds, and marine mammals), intrinsic rates of increase are extremely low, and cumulative impacts from multiple fisheries and non-fishery threats can still drive populations toward extinction. Moreover, the MSC Standard at SG80 requires that “the direct effects of the UoA are highly unlikely to hinder recovery of the ETP/OOS unit to favourable conservation status.” Simply being below <math>r</math> does not meet this test and risks normalising ongoing bycatch. Mortality of ETP/OOS species should be minimised, not legitimised through such thresholds. This criterion should also be deleted.</p> <p>A5.2.1.a (stable or increasing population trend): This is the only acceptable criterion, provided trends are demonstrated using robust, independent, and regionally relevant data.</p> <p>In summary, A5.2.1.b and A5.2.1.c should be deleted. Adjustments to PSA scores should only be possible where robust evidence of stable or increasing population trends exists. Otherwise, precaution must prevail, and PSA scores should remain unadjusted.</p>
<b>114935167081</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114935145363</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114934996080</b>	Non-governmental organisation	Duplicate of 114935680642

<b>114934471709</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114934041597</b>	Non-governmental organisation	It does not appear to account for cumulative impacts for species with highly migratory ranges
<b>114933972264</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114931893479</b>	Non-governmental organisation	<p>MSC should revise the new optional Residual Risk Analysis (RRA) tool to ensure it does not disproportionately affect low-productivity species like seabirds.</p> <p>Crucially, the RRA tool must incorporate cumulative impacts from multiple fisheries (both MSC-certified and uncertified). This is essential because an individual fishery's impact might be below the intrinsic rate of population increase, but collective impacts could rapidly exceed this rate, affecting a species' recovery or survival.</p>
<b>114899462711</b>	Non-governmental organisation	<p>Criteria A5.2.1a and A5.2.1c are OK.</p> <p>Criteria A5.2.1b depends on the context. For an ETP/OOS seems OK, but it depends on the level of annual removal and other potential hazards. For fish bycatch, 5000 could be low.</p>
<b>114900517337</b>	Academic/scientific professional	The information on A5.2.1a here is too obscure, not confined by ERF?

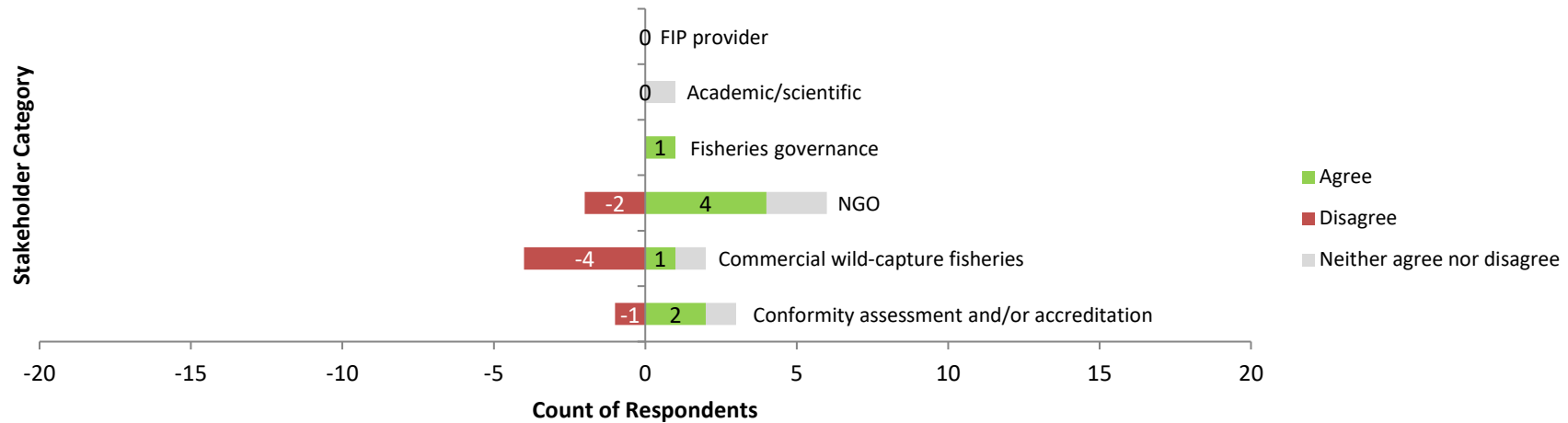
**"There will be sufficient information for assessors to evaluate the population status using one of the criteria in A5.2.1.a - c for most fisheries where the PSA is used for an in-scope or ETP/OOS species."**



Respondent ID	Stakeholder Category	Comments
114935854975	Conformity assessment and/or accreditation	See previous response.
114935220378	Conformity assessment and/or accreditation	This needs to be tested, too early to tell.
114931975029	Conformity assessment and/or accreditation	see answers above for #52
114935985271	Commercial wild-capture fisheries	The criteria are as follows: a. There is information indicating that the scoring element population is stable or increasing, b. There is information indicating that the population size is greater or equal to 5000 mature individuals, or c. There is information indicating that the UoA fishing mortality is below the intrinsic rate of population increase.

		We do not agree that there will always be such information – b) is the most likely to be achieved, c) may be achieved, but meeting a) will depend on the age of the information or the length of time over which it is deemed acceptable to determine an increase or decrease in population status.
<b>114935328811</b>	Commercial wild-capture fisheries	We agree with and support the comments of the Association of Sustainable Fisheries.
<b>114935030286</b>	Commercial wild-capture fisheries	We do not agree that there will always be such information. We believe b) is the most likely to be known or achieved, while c) may be achieved, but meeting a) may be extremely challenging. In all cases, collecting data is likely to be hugely expensive and time consuming, and it seems likely that meeting a criterion will depend on the age of the available information or the length of time over which it is deemed acceptable to determine an increase or decrease in population status.
<b>114935742704</b>	Non-governmental organisation	I'm not sure if this can be stated for "most" fisheries. It'll likely need to be evaluated on a case-by-case basis.
<b>114935713917</b>	Non-governmental organisation	See notes above
<b>114935463463</b>	Non-governmental organisation	114935463463 disagrees. For most ETP/OOS species, robust, regionally relevant population data are lacking. As set out in our response to Q57, A5.2.1.b and A5.2.1.c should be deleted, leaving only criterion (a). Adjustments should only be applied where independent, regionally relevant trend data are available; otherwise PSA scores should remain unadjusted and precaution must prevail.
<b>114931893479</b>	Non-governmental organisation	MSC should revise the new optional Residual Risk Analysis (RRA) tool to ensure it does not disproportionately affect low-productivity species like seabirds.  Crucially, the RRA tool must incorporate cumulative impacts from multiple fisheries (both MSC-certified and uncertified). This is essential because an individual fishery's impact might be below the intrinsic rate of population increase, but collective impacts could rapidly exceed this rate, affecting a species' recovery or survival.
<b>114899462711</b>	Non-governmental organisation	I think that for many bycatch species on the limit of 2% catch rate, assessing population status would be challenging.
<b>114900517337</b>	Academic/scientific professional	PSA and CA are not both used as mandatory for P2 species. shouldn't it?

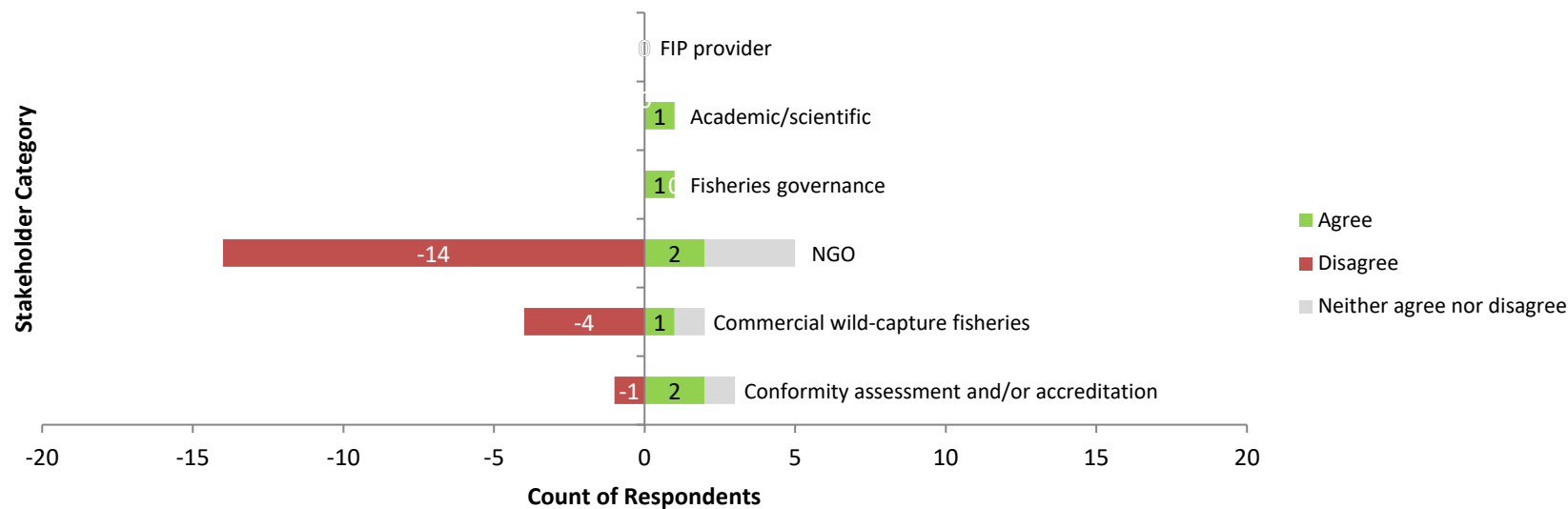
**"The score modification criteria in Table X are appropriate."**



Respondent ID	Stakeholder Category	Comments
114935985271	Commercial wild-capture fisheries	Like ASF, we disagree because we feel the modification criteria put too high a bar to passing. Again, we feel this is in essence an attempt to fix a problem by tweaking the outcome rather than by addressing the underlying issue, which is that the outcome scores are too precautionary where it is not possible to meet SG80 by reducing susceptibility to low or very levels.
114935328811	Commercial wild-capture fisheries	We agree with and support the comments of the Association of Sustainable Fisheries.
114935030286	Commercial wild-capture fisheries	The ASF disagrees because we feel the modification criteria set too high a bar. Again, we feel this is in essence an attempt to fix a problem by tweaking the outcome rather than by addressing the underlying issue, which is that the outcome scores are too precautionary where it is not possible to meet SG80 by reducing susceptibility to low or very levels.
114935742704	Non-governmental organisation	Because cumulative impacts of non-MS-C-certified fisheries are not included in the Assessment, then the score modification criteria in Table X are not appropriate at this time.

114931893479	Non-governmental organisation	The RRA tool must incorporate cumulative impacts from multiple fisheries (both MSC-certified and uncertified). This is essential because an individual fishery's impact might be below the intrinsic rate of population increase, but collective impacts could rapidly exceed this rate, affecting a species' recovery or survival.
114900517337	Academic/scientific professional	I think there should be tailor made clauses for DLF, not copied from GSA only.

"The score modification criteria in Table Y are appropriate."

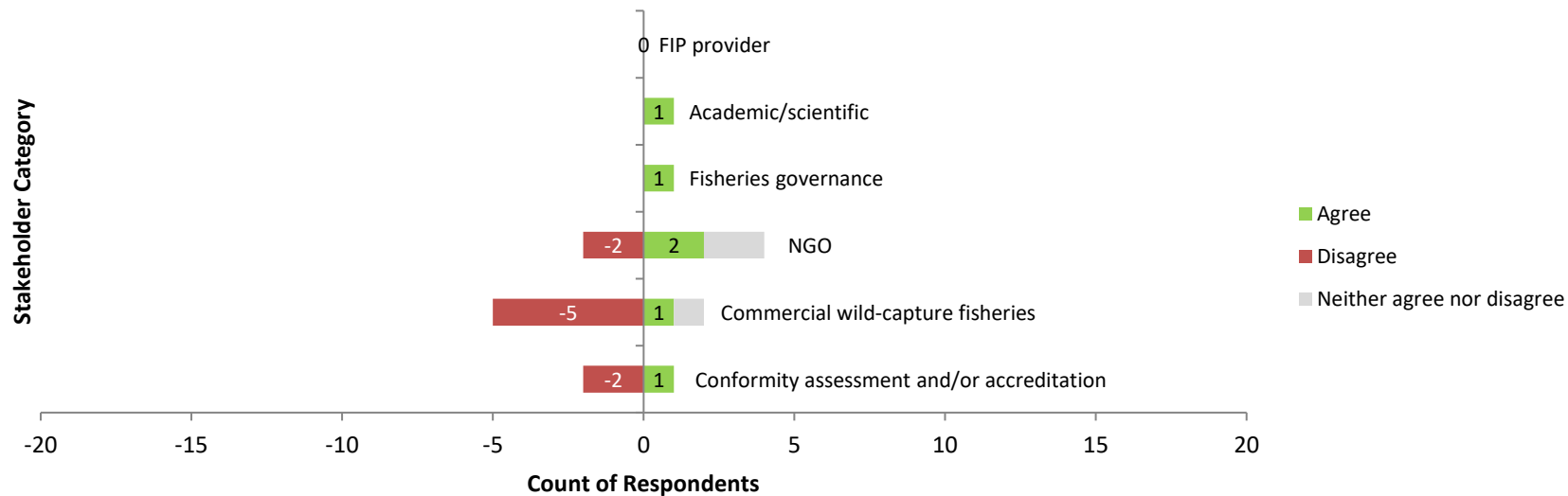


Respondent ID	Stakeholder Category	Comments
114935220378	Conformity assessment and/or accreditation	Prefer to say after testing
114931975029	Conformity assessment and/or accreditation	see answers above for #51
114935985271	Commercial wild-capture fisheries	See above.

<b>114935328811</b>	Commercial wild-capture fisheries	We agree with and support the comments of the Association of Sustainable Fisheries.
<b>114935030286</b>	Commercial wild-capture fisheries	As above.
<b>114935742704</b>	Non-governmental organisation	We are concerned about the lack of specificity given on what "reduced" or "minimized" means in practice. Without specific criteria the Assessor may adjust scores without the underlying data or understanding necessary to make that decision.
<b>114935680642</b>	Non-governmental organisation	Duplicate of 114935742704
<b>114935583787</b>	Non-governmental organisation	Main concern is with the second criterion. "Evidence indicates that the strategy has reduced or minimized the mortality rate of the ETP/OOS unit." There is no indication of the level of bycatch mortality reduction or minimization at which assessors are expected to consider this criterion to be "met." The term "reduced" is particularly problematic. As we understand it, it only requires a) "a clear trend showing a decline in mortalities due to the implementation of the measures described in 2.2.2a since the measures were introduced" or b) "a reduction in the mortality rate relative to the population size of the ETP/OOS unit." Therefore, theoretically, a 1% bycatch reduction could be considered acceptable under Table Y, Criterion 2.
<b>114935402174</b>	Non-governmental organisation	The main concern is with Criterion 2: "Evidence indicates that the strategy has reduced or minimised the mortality of the ETP/OOS unit." There is no clear guidance on what level of bycatch reduction is required to meet this criterion. The term "reduced" could, in theory, allow even minimal reductions—such as a 1% decrease in bycatch—to be considered acceptable.
<b>114935537358</b>	Non-governmental organisation	Duplicate of 114935742704
<b>114935463463</b>	Non-governmental organisation	114935463463 disagrees. Table Y allows automatic score increases once a strategy exists, some evidence of reduced mortality is presented, and biennial reviews are carried out. This is weaker than the MSC Standard requirements, which demand that UoA impacts are highly unlikely to hinder recovery (PI 2.2.1, SG80) and that mortality is reduced or minimised (PI 2.2.2, SG80). Without clear requirements for robust, independent, and long-term evidence, these criteria risk certifying fisheries whose bycatch still undermines recovery. For ETP/OOS species, precaution requires stronger safeguards, not automatic score uplift.

<b>114935167081</b>	Non-governmental organisation	Duplicate of 114935742704
<b>114935145363</b>	Non-governmental organisation	Duplicate of 114935742704
<b>114934996080</b>	Non-governmental organisation	Duplicate of 114935742704
<b>114934471709</b>	Non-governmental organisation	Duplicate of 114935742704
<b>114934041597</b>	Non-governmental organisation	It seems that even a very modest reduction in bycatch could be accepted
<b>114933972264</b>	Non-governmental organisation	Duplicate of 114935742704
<b>114931893479</b>	Non-governmental organisation	<p>MSC should revise the new optional Residual Risk Analysis (RRA) tool to ensure it does not disproportionately affect low-productivity species like seabirds.</p> <p>Crucially, the RRA tool must incorporate cumulative impacts from multiple fisheries (both MSC-certified and uncertified). This is essential because an individual fishery's impact might be below the intrinsic rate of population increase, but collective impacts could rapidly exceed this rate, affecting a species' recovery or survival.</p>
<b>114899462711</b>	Non-governmental organisation	<p>I didn't find GSA3.10.2.</p> <p>If a fishery implements "best standards" and mortality rates are low, it would be difficult to prove a reduction in mortality. Small change in redaction: "Evidence indicates that the strategy has reduced or has minimised the mortality of the ETP/OOS unit below negligible levels."</p>

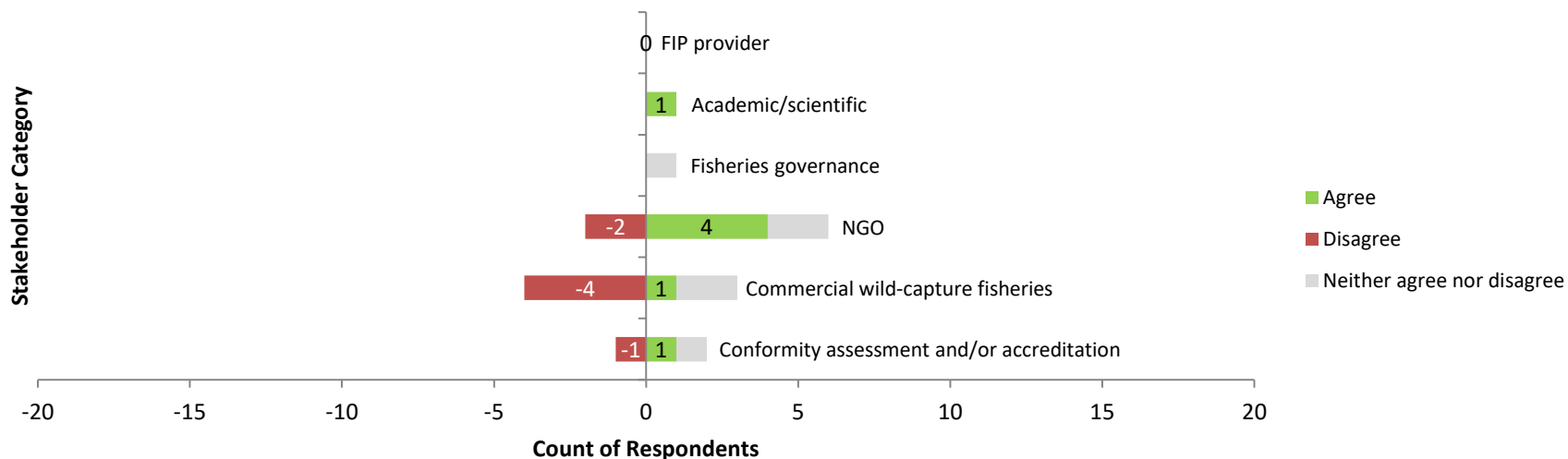
**"The score modification criteria in Tables X or Y are achievable for most fisheries seeking to gain or maintain MSC certification."**



Respondent ID	Stakeholder Category	Comments
114935220378	Conformity assessment and/or accreditation	The modification criteria remain a high bar to meet. Some fisheries will be able to meet the requirements, many will not.
114931975029	Conformity assessment and/or accreditation	see answers above for #51
114935985271	Commercial wild-capture fisheries	The modifications in Table X and Y require very high levels of performance, and we feel they are essentially unachievable for most MSC fisheries.
114935328811	Commercial wild-capture fisheries	We agree with and support the comments of the Association of Sustainable Fisheries.
114935030286	Commercial wild-capture fisheries	The modifications in Table X and Y require very high levels of performance, and the ASF feels they are essentially unachievable for most MSC fisheries.
114935713917	Non-governmental organisation	We do not think many fisheries that interact with ETP/OOS species will be able to provide all of the requirements in tables X and Y. Conditions may remain open for many years because of this.
114899462711	Non-governmental organisation	For some current fisheries, it will take some adjusting time. If assessed today against those criteria, they would fail.



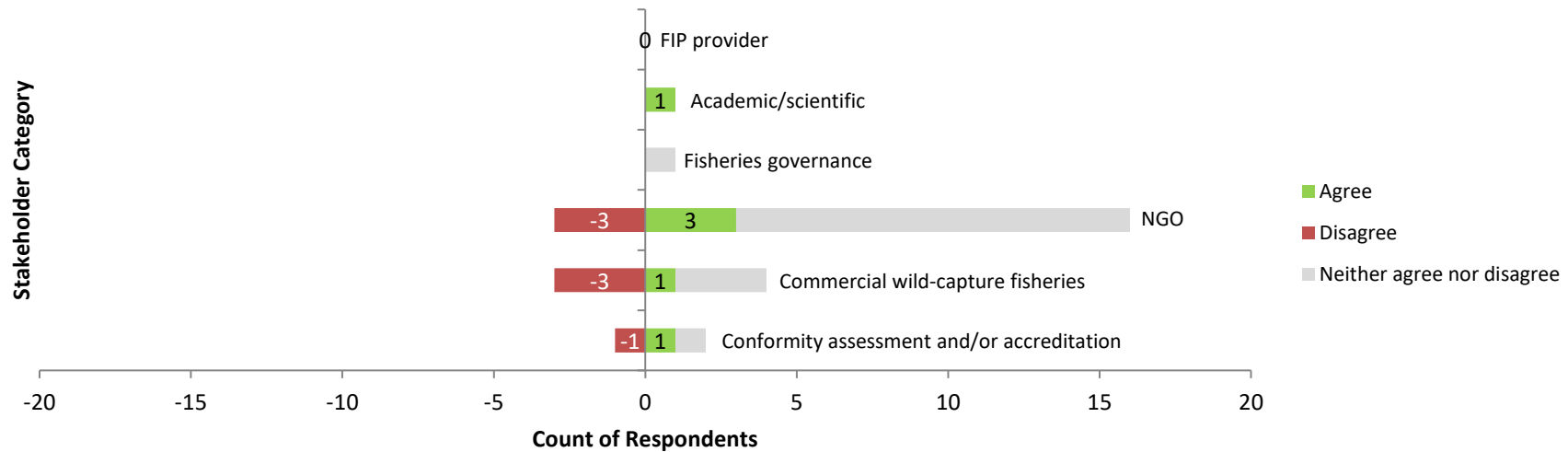
**"The requirements in A5.2.4 are acceptable."**



Respondent ID	Stakeholder Category	Comments
114934751228	Conformity assessment and/or accreditation	It seems acceptable. However, If a score is <60 and it manages to meet all the criteria and increase to 60 (5.2.4 a) how will it have a path to SG80? I might be missing something, but seems like it would just delay it from eventually failing.
114935220378	Conformity assessment and/or accreditation	Prefer to say after testing.
114935985271	Commercial wild-capture fisheries	A5.2.4 is Table Y, and as such we refer to the response above.
114935328811	Commercial wild-capture fisheries	We agree with and support the comments of the Association of Sustainable Fisheries.
114935030286	Commercial wild-capture fisheries	A5.2.4 is the section containing Table Y, and as such we refer to the response above.
114935742704	Non-governmental organisation	Disagree, due to above-stated concerns about score modification.
114935463463	Non-governmental organisation	114935463463 disagrees. A5.2.4 mandates automatic score increases once the criteria in Table X are met (<60→60, 60–79→80). Automatic uplift

undermines the precautionary intent of the PSA, which is meant to reflect inherent biological risk. Score modification should only occur where there is independent, robust, and long-term evidence that UoA mortality is not hindering recovery; otherwise PSA scores should remain unadjusted.

**"The requirements in A5.2.5 are acceptable."**

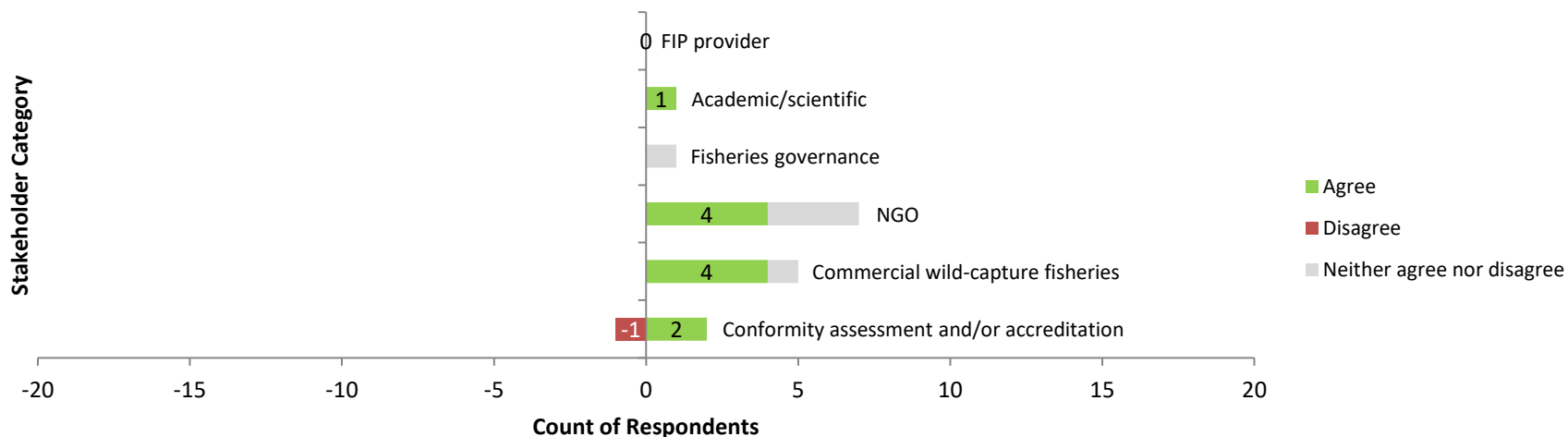


Respondent ID	Stakeholder Category	Comments
114934751228	Conformity assessment and/or accreditation	Same issue as question 60
114935220378	Conformity assessment and/or accreditation	Prefer to say after testing.
114935985271	Commercial wild-capture fisheries	We join ASF in disagreeing that the approach here is appropriate. However, if such a system is to be employed then, given the bar set by the requirements in Tables X and Y, we would expect a fishery score to be modified to at least 80

		irrespective of the starting score. It should not be the case that a fishery could have a strategy in place, there is evidence it is effective with a review at least every two years, and still score $\leq 80$ .
<b>114935328811</b>	Commercial wild-capture fisheries	We agree with and support the comments of the Association of Sustainable Fisheries.
<b>114935030286</b>	Commercial wild-capture fisheries	We disagree that the approach here is appropriate. However, if such a system is to be employed then, given the bar set by the requirements in Tables X and Y, we would expect a fishery score to be modified to at least 80 irrespective of the starting score. It should not be the case that a fishery could have a strategy in place, there is evidence it is effective with a review at least every two years, and still score $\leq 80$ .
<b>114934899083</b>	Commercial wild-capture fisheries	NFA would like to refer to commentary provided by ASF on the RBF.
<b>114935742704</b>	Non-governmental organisation	We are concerned about adjusting the scoring element score based on the requirements for A5.2.5, given the lack of specificity on what "reduced" or "minimized" means in practice.
<b>114935680642</b>	Non-governmental organisation	It would depend on if the Criteria in Table Y are updated, considering our previous comment/concern, regarding the lack of clear definition and consideration for bycatch "reduction" or "minimization".
<b>114935583787</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114935402174</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114935537358</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114935463463</b>	Non-governmental organisation	A5.2.5 requires CABs to automatically raise scores for ETP/OOS species once the Table Y criteria are met ( $<60 \rightarrow 60$ , $60-79 \rightarrow 80$ ). This is not acceptable for vulnerable taxa. The criteria rely on the presence of a strategy, partial evidence of reduced mortality, and biennial reviews, but do not ensure that UoA impacts are highly unlikely to hinder recovery to favourable conservation status (PI 2.2.1, SG80). For ETP/OOS species, automatic score uplift undermines precaution. Adjustments should only be possible where independent, robust, and long-term evidence demonstrates that mortality is minimised to recovery-consistent levels. Otherwise PSA scores must remain unadjusted.
<b>114935167081</b>	Non-governmental organisation	Duplicate of 114935680642

<b>114935145363</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114934996080</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114934471709</b>	Non-governmental organisation	Duplicate of 114935680642
<b>114934041597</b>	Non-governmental organisation	Not unless improvements are made to assuage concerns around the bycatch reduction requirements.
<b>114933972264</b>	Non-governmental organisation	It would depend on if the Criteria in Table Y are updated, considering our previous comment/concern, regarding the lack of clear definition and consideration for bycatch “reduction” or “minimization”.
<b>114899462711</b>	Non-governmental organisation	Given the change indicated in Q.58.

**"The guidance added in GSA6.1.4 clarifies when the process described in A5.2 can be used at a subsequent assessment."**



Respondent ID	Stakeholder Category	Comments
114934751228	Conformity assessment and/or accreditation	I was unable to find GSA6.1.4 in the materials
114935220378	Conformity assessment and/or accreditation	I'm not sure I understand this requirement or why a fishery that initially meets SG60 after modification, would not be allowed to meet SG80 after modification the second time around - this scenario surely indicates improvement in the fishery? A6.1.4 is also really unclear, sorry.
114935985271	Commercial wild-capture fisheries	We agree that the guidance clarifies the process, but we disagree that it is appropriate. For species such as those listed, it is extremely unlikely that the criteria to avoid the use of a PSA can be met. We feel this could result in fisheries being unreasonably prevented from seeking reassessment.
114935328811	Commercial wild-capture fisheries	We agree with and support the comments of the Association of Sustainable Fisheries.
114935030286	Commercial wild-capture fisheries	We agree that the guidance clarifies the process, but we disagree that it is appropriate. For species such as those listed, it is extremely unlikely that the criteria to avoid the use of a PSA can be met. We feel this could result in fisheries being unreasonably prevented from seeking reassessment.

<b>114935742704</b>	Non-governmental organisation	We agree it clarifies the process, but our concerns about adjustments of the scoring elements remain.
<b>114935463463</b>	Non-governmental organisation	114935463463 acknowledges that GSA6.1.4 provides clarification on the re-use of A5.2 in subsequent assessments. However, this clarification does not resolve 114935463463's core concerns: the underlying criteria (Tables Y, and A5.2.1.b–c) are scientifically weak and undermine precaution. If those provisions remain unchanged, allowing their repeated use in later assessments risks entrenching inappropriate score adjustments. Clarification alone is insufficient — the process must be underpinned by robust and precautionary criteria before it is applied or re-applied.
<b>114899462711</b>	Non-governmental organisation	The section was GA6.1.4... please keep your coding consistent...