

MSC Fisheries Program Revisions

Summary of proposals for public consultation

Table of Contents

MSC Fisheries Program Revisions	1
Introduction	3
About the Fisheries Program Revisions	3
Revisions to the Fisheries Standard v3.1	5
Principle 2	5
Categorisation of species components and designation of Endangered, Threatened, and Protected (ETP) species	5
Revised outcome requirements for species components	8
Revised management requirements for species components	10
Monitoring requirements	13
Revised information requirements for species components	16
Principle 3	17
Introduction of jurisdictional scoring elements	17
Clarification of international cooperation	19
Section SE	20
Application of Section SE to non-tuna stocks	20
Revisions to the Fisheries Standard Toolbox v1.2	22
Tool A: The Risk-Based Framework	22
Tool B: The Evidence Requirements Framework	25
Revisions to the Fisheries Certification Process v3.1	27
Revisions to Process Requirements	27
Defining the Unit of Assessment and Unit of Certification	27
Scoring the Unit of Assessment	28
Setting conditions	29
Announcement Comment Draft Report (ACDR) at reassessment and clarifications to the (re)assessment process	31
Traceability and alignment with the MSC Chain of Custody (CoC) Review	32

Inseparable catch (known previously as inseparable and practicably inseparable catch)	34
Additions to the fishery certificate (adding other eligible fishers, expedited audits, and scope extensions)	36
Certificate splitting	38
Revisions to Annex PA	39
Scope extension requirements	39
Revisions to Annex PB	41
Harmonisation process and outcomes	41
Revisions to Annex PC	43
Assessment team leader competencies	43
Revisions to MSC Reporting Templates	44
Fishery Assessment Template	44
Stakeholder Comments Template	46
Certification Statement Template	46
Scoring Worksheet	47
Fishery Assessment Announcement Template / Reassessment Plan	47
Client Information Request Template (previously 'Client Document Checklist')	47
Removal of Client Action Plan	48
Surveillance Audit Template	48
Vessel Information Template	48

Introduction

This document provides an overview of proposed changes to the Fisheries Standard v3.1, Fisheries Certification Process v3.1, and Fisheries Standard Toolbox v1.2. It is intended to support stakeholders participating in a public consultation on the proposals.

The consultation is open for 60 days from 8 October to 8 December 2026. During this time, stakeholders are invited to review the proposals and provide feedback via a survey.

Stakeholders are encouraged to read the following summaries alongside the draft proposals, which provide full details of all proposed changes.

Note that AI tools were used to support the drafting and editing of this document. All content was reviewed and approved by the authors.

About the Fisheries Program Revisions

The MSC launched the [Fisheries Program Revisions](#) in September 2025 to make necessary, targeted revisions to the Fisheries Standard v3.1 and associated scheme documents.

The revisions are key to addressing issues identified following publication of version 3 of the Standard. Although this version of the Standard introduced important new requirements, such as the explicit assessment of gear loss and requirements for a Fins Naturally Attached policy, concerns were raised that some requirements were overly complex and difficult to audit. There were also concerns that some requirements created unnecessary hurdles for some of the best-performing fisheries already certified under the previous version.

To resolve these issues, the MSC is working with fishery assessors, and representatives from fisheries and NGOs to develop and test revisions. This collaborative approach ensures input from a wider range of perspectives and expertise, helping make sure the revised requirements can be consistently applied and deliver the intended sustainability outcomes.

Revisions to the Fisheries Standard v3.1

Principle 2

Categorisation of species components and designation of Endangered, Threatened, and Protected (ETP) species

Reference in the DRAFT Standard v4.0

- SA3.1 “General requirements for Principle 2”
- SA3.5 “Categorisation of fish and invertebrate species”
- SA3.9 “Categorisation of bird, mammal, reptile and amphibian species”

Background information

Issues with the categorisation of ETP with out-of-scope (OOS) species

Feedback from the implementation of v3 and v3.1 of the Fisheries Standard indicated that the requirements for categorising species as Endangered, Threatened, and Protected (ETP) and the automatic grouping of out-of-scope species with ETP species was overly precautionary, complex and burdensome. Conversely, v2.01 excluded some key species, such as certain shark species, that should reasonably have been considered under ETP provisions and thus subject to a higher performance bar.

Issues with the concept of ‘negligible species’

A requirement was introduced to v3 which meant interactions with a bycatch species could be considered ‘negligible’ if they were demonstrably low. A classification of ‘negligible’ would mean no further consideration in scoring the fishery.

For fish and invertebrate species, this applied when the species made up less than 2% of the total catch. For out-of-scope species, this applied if fewer than 10 individuals were caught per year and the breeding population was sufficiently large.

In practice, this did not always provide sufficient precaution for species that are slow to mature and reproduce. This included some endangered shark species, as even low levels of bycatch of these species can have a significant impact.

Summary of proposal

The proposed revision establishes a more balanced and scientifically defensible framework, ensuring species are categorised as ETP only where appropriate, based on their conservation status and relevant international or national listings (e.g., CITES, CMS and IUCN Red List). The approach combines taxa and conservation concern, recognising two main components: (i) fish and invertebrate species, and (ii) out-of-scope taxa (bird, mammal, reptile and amphibian species). Within these, species are categorised as ETP following relevant listings or assessments, while non-ETP species are assessed as main or minor (for fish and invertebrates) or as non-ETP (for out-of-scope taxa).

The revised categorisation framework aims to achieve the original intent of ensuring that depleted or high-concern species receive appropriate consideration within the Standard, and that well-managed or low-concern species can be assessed appropriately under Principle 2. For fish and invertebrate species, this also means ensuring that appropriate species remain eligible for assessment under Principle 1.

The revisions also remove previous modification criteria, an effective “opt out” clause under v3 that allowed species to not be considered ETP when specific criteria of life history characteristics, management status, and stock status were met. The removal of modification criteria is intended to simplify the assessment process and improve efficiency.

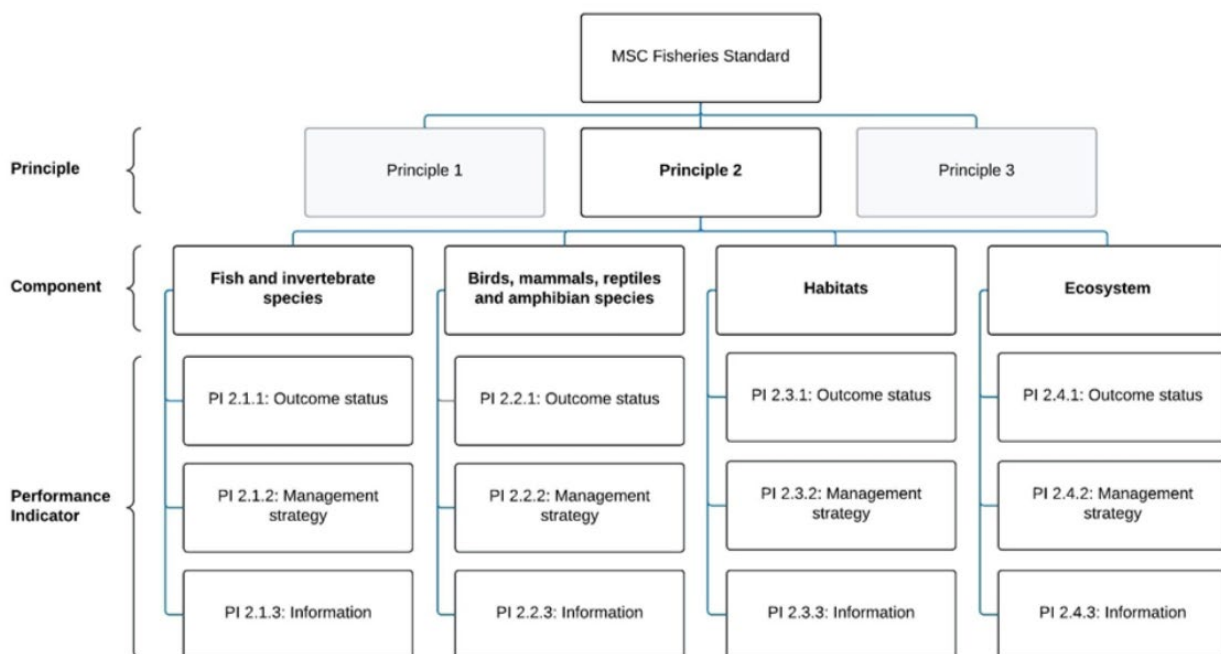


Figure 1 Revised Default Assessment Tree for Principle 2

With the updated categorisation, the concept of “negligible” is considered insufficiently precautionary for a P2 assessment, leading to some vulnerable species not being properly assessed so has been removed. Instead, assessors can decide whether to score all minor species at the SG100 level for certain scoring issues. Non-ETP in the out-of-scope taxa are always assessed.

Revised **outcome** requirements for species components

Reference in the DRAFT Standard v4.0

- SA3.1 “General requirements in Principle 2”
- SA3.2 “General requirements for outcome PIs”
- SA3.6 “Fish and invertebrate species outcome PI” (PI 2.1.1)
- SA3.10 “Bird, mammal, reptile and amphibian species outcome PI” (PI 2.2.1)

Background information

Issues with the reference point of ‘Favourable Conservation Status’

Under v3.1, assessors were required to consider whether a fishery is impacting a population’s ability to recover to a threshold known as Favourable Conservation Status (FCS) – a minimum of ‘50% of unimpacted levels within three generations or 100 years, whichever is shorter.’

This aimed to ensure assessments are more quantifiable, however in practice many fisheries lacked the data required to meet FCS. For many species, information on what constitutes FCS is not available and management bodies typically do not collect such data for out-of-scope species of low conservation concern.

Issues with the treatment of ‘unobserved mortality’

V3.1 also required assessors to quantify unobserved mortality (e.g. stress-related deaths from gear interactions) of ETP and out-of-scope species, in addition to observed mortality. In practice, assessors experienced challenges obtaining the required data on unobserved mortality and raised concerns over the feasibility of this requirement.

Summary of proposal

Changes to the reference point of ‘Favourable Conservation Status’

FCS was considered an inappropriate reference point for ETP and out-of-scope species due to limited data availability and insufficient adoption in fishery management systems around the world. A decision was made to propose alternative scoring language that is more appropriate for the species groups in question.

The revised approach introduces a renewed focus on direct effects of the unit of assessment “not hindering recovery” as a more appropriate outcome expression. This provides greater flexibility in accommodating different reference points, conservation objectives, and management approaches, compared to the previous explicit requirement for FCS. The approach also aligns more closely with Version 2.01 of the Standard.

At the SG100 level, the logic maintains a link to the FCS concept by requiring that recovery is not hindered to a defined rate of recovery or specified/improved status. However, it allows more flexibility in defining what constitutes an “improved status” compared to v3.1, where FCS was an explicit requirement.

Changes to the treatment of unobserved mortality

The requirements for unobserved mortality relate to two different parts of P2: the identification of scoring elements at the outset of the P2 assessment, and the scoring of outcome PIs.

To address issues with clarity and effectiveness, several changes have been made in both places. To begin with, the scoring element identification process has been revised and streamlined. Assessment teams are required to build a species list that includes species in the catch profile, species not in the catch profile that are subject to direct effects of the Unit of Assessment (UoA) (including unobserved mortality related to fishing operations), and wild-capture bait species.

A new definition of “direct effect” has been included to clarify the type of interaction that should be considered when identifying species not in the catch profile. The definition includes injuries and mortalities due to interaction with fishing operations, including gear, vessels, and associated equipment, retaining precaution where species may be directly affected even if they do not appear in the catch profile.

The main issue in the Standard v3.1 was the combination of unobserved mortality with the requirement for quantitative evaluation of UoA impacts in relation to Favourable Conservation Status. Assessors reported difficulty quantifying unobserved mortality where evidence was limited.

In this proposal, teams are still expected to consider observed and unobserved mortality, proportionate to the information available. The removal of Favourable Conservation Status as a reference point should reduce the feasibility issue linked to unobserved mortality and a lack of quantitative information.

Revised **management** requirements for species components

Reference in the DRAFT Standard v4.0

- SA3.1 “General requirements in Principle 2”
- SA3.3 “General requirements for management PIs”
- SA3.7 “Fish and invertebrate species management PI” (PI 2.1.2)
- SA3.11 “Bird, mammal, reptile and amphibian species management PI” (PI 2.2.2)

Background information

Several issues were raised with management requirements for species components in P2. The current wording can conflate the type or responsiveness of management in place with its actual effectiveness. With these revisions, the MSC aims to provide a clearer distinction between scoring whether management is in place, and the effectiveness of that management.

Moreover, in v3.1, requirements were introduced for fisheries to demonstrate how mortality of ETP and out-of-scope species is effectively minimised. Assessors reported difficulties interpreting what ‘minimised’ means in practice. They also identified conflicts between the requirements and regulations set by management bodies that allow retention of such species.

Summary of proposal

Scoring Issues (SIs) (a) (management of ETP species), (b) (management of non-ETP/main and minor) and (c) (management implementation)

There are several changes being proposed to the management PIs in Principle 2. To provide a clearer distinction between “management exists” and “management is effective”, the scoring issue guideposts have been revised.

The revised structure is intended to make the scoring questions more distinct with more consistent and incremental progression across Scoring Guideposts. SI(a) and SI(b) ask whether an appropriate type of management arrangement exists for the relevant scoring elements that is consistent with the relevant MSC SG80 Outcome level. SI(c) asks whether that management is implemented.

The concept of minimise

The previous requirement to “minimise” impacts was considered challenging to assess in practice. It created difficulties for many common species that certified fisheries interact with,

particularly where the term “minimise” was difficult to define or apply consistently. There was also concern it was insufficiently precautionary and so has been removed as a concept.

The updated requirement shifts focus toward ensuring that effective management measures exist to:

- Prevent the direct effects of the UoA hindering the recovery of an ETP species, or
- Ensure that a non-ETP species remains above appropriate population reference points (point of recruitment impairment (PRI), maximum sustainable yield (MSY) or level at which reproduction may be seriously threatened).

The requirements now focus on ensuring that management systems are effective in achieving the intended outcome at the SG80 level for the relevant species group. The expectation for ETP species is that a strategy is in place at SG80 and a comprehensive strategy at SG100, as opposed to a partial strategy at SG80 and a strategy at SG100 for non-ETP species.

Shark finning requirements

For the management of fish and invertebrate species, the shark finning scoring issue has been retained in P2 but, along with the shark finning scoring issue in P1, has been modified to account for changes to the [Evidence Requirements Framework \(ERF\)](#). The ERF was a new tool in the MSC Fisheries Standard Toolbox v1.2 to evaluate the quality of information used in an assessment. It is mandatory for assessors to use the ERF when evaluating whether shark finning could be occurring. The MSC prohibits shark finning in certified fisheries, and the proposal does not change the requirement introduced in v3.1 for fisheries to have either a Fins Naturally Attached (FNA) or non-retention policy for all sharks caught. Instead, the proposed changes focus on the information available and compliance with that policy.

The proposal is to score the requirement for an FNA or non-retention policy explicitly as a management requirement and adds that this policy is “expected to be effective”. This replaces the previous requirement for a “high degree of certainty that shark finning is not occurring” in the guidepost.

As part of this change, the proposal defines what is meant by “expected to be effective”, where:

- There is adequate information to estimate compliance, using the ERF to support this determination; and
- There is no objective and verifiable evidence of non-compliance within the fishery.

The MSC recognises that FNA or non-retention policies may be newly implemented and potentially introduced at the fishery level as an operational policy, for example in geographical

areas without a historical practice of shark finning or where FNA regulations have not been introduced by management policies. The language of “expected to be effective” is meant to capture a situation where there is credible evidence that a new policy will succeed in excluding shark finning from a fishery. For example, this could be based on a good understanding of the fishery’s compliance with other regulations or operational policies, and evidence of successful initial implementation. Even in these circumstances, adequate information is still needed to pass.

Monitoring requirements

Reference in the DRAFT Standard v4.0

- SA3.7 “Fish and invertebrate species management PI” (PI 2.1.2)
 - SA3.7.1 & GSA3.7.1
- SA3.11 “Bird, mammal, reptile and amphibian species management PI” (PI 2.2.2)
 - SA3.11.1

Background information

The MSC is revising the performance levels required of fisheries for monitoring, including the thresholds set for independent observation. The revisions intend to ensure that expectations of fisheries are set appropriately in line with practices that are widely accepted and adopted by fisheries management agencies.

Prescriptive monitoring thresholds were first introduced in v3 of the Standard within the new Evidence Requirements Framework (ERF). These thresholds were maintained in v3.1, with RFMO-managed fisheries on the high seas required to have in place independent observation of at least 30% of fishing events per year at the SG80 level. At the minimum acceptable level of SG60, all fisheries were required to report catch information to management authorities and have independent verification of that catch data. All fisheries, not just those on the high seas, were required to have independent observation of catch data to pass without conditions at SG80. At SG100, fisheries were required to have a full census of catches using independent observation.

During the Toolbox Review from 2024-25, monitoring requirements were moved from the ERF into the Standard to clarify that they are performance requirements for fisheries, not assessors. The MSC undertook a review of those requirements which has been developed further as a part of the Fisheries Program Revisions.

Several benefits and risks were raised by our stakeholders following the publication of v3.1. While independent observation via human observers or electronic monitoring (EM) programmes is broadly considered best practice for collecting catch data, the requirements were scrutinised for failing to account for the diversity of fisheries in the MSC program and capacities for implementing those programmes, including highly selective fisheries (e.g., hand-gathering) or alternative monitoring approaches (e.g., reference fleets). It is important that the MSC codifies best practice correctly in the Standard, while ensuring requirements are proportionate to the risks presented by different fisheries and reflect monitoring approaches that are appropriate across different management contexts.

The SG60 requirement in particular was seen as effectively imposing a pass or fail requirement for observer or EM coverage in many cases. Upon further research

commissioned by the MSC¹, this was not shown to be an appropriate bar for the minimum acceptable level.

Summary of proposal

Several changes have been proposed across the standard to address the concerns around monitoring requirements, and to ensure that the requirements are clear.

As mentioned previously in the changes related to [unobserved mortality](#), to identify the species that need to be assessed in P2, it is proposed that all fisheries must provide a recent and representative overview of their catch, which may be compiled from several information sources. No stand-alone scoring issue is proposed to assess independent verification of these data. Rather, this will be considered when determining the adequacy of information using the ERF. This approach is seen to be more robust, prevents duplication and provides clearer instructions to assessors.

Fisheries with vessels operating in the high seas are seen to be higher risk, so specific monitoring requirements have been included for assessment under the management PIs in P2. Requirements are embedded within the definition of a management strategy, which is scored in PIs 2.1.2.a and b and 2.2.2.a and b.

No requirement is included at SG60, meaning that there is no pass or fail requirement for independent observation in a high-seas fishery. Whilst research has shown independent observation programs are best practice in fisheries management, it was not appropriate to require them at the minimum acceptable level. Keeping the requirement at SG60 risked excluding many fisheries and undermining the MSC Theory of Change.

To score SG80, the management strategy for a high seas fishery must include a clear management policy objective for independent observation of at least 20% of fishing events each year. At the very least, a high-seas fishery that does not attain the SG80 requirement, will require a condition in order to maintain certification and pass future reassessment. A requirement of 20% independent observation is widely accepted as best practice, and is increasingly the target adopted by management agencies. It aligns with many scientific recommendations¹ and reflects growing momentum to increase coverage within Regional Fisheries Management Organisations. It also intends to balance the need for requirements to be feasible alongside requiring fisheries to reach a high level of performance.

At the highest performance level, to score SG100, the management policy objective requires independent observation of 100% of fishing events each year for high seas fisheries. This

¹ MRAG. 2025. *Investigating information verification and observer/REM coverage levels in fisheries worldwide*. Marine Stewardship Council, March 2025. [mrag-2025-information-verification-and-observer-coverage-levels.pdf](#)

represents state-of-the-art performance and aims to reward fisheries that are achieving this level of independent observation.

The execution of these management policy objectives will be assessed under the management SI(c) which seeks to assess how well management strategies are implemented.

There are exceptions to these requirements for high-seas pole-and-line, troll and handline fisheries. These reflect current regulatory norms and the widely accepted lower risk profile of certain gear types. These fisheries are still required to provide a catch profile, with the adequacy of that information being assessed through the ERF. New guidance also asks the assessment team to check how the management system verifies data reported by fishers and whether those checks are strong enough to support the management strategy.

To complement the high-seas monitoring requirements, new guidance has been incorporated on the use of human observers and electronic monitoring for independent observation, including how coverage, representativeness and footage-review rates should be considered.

Overall, the monitoring requirements proposal retains expectations for credible monitoring while making a stronger distinction between collecting information and managing the fishery effectively. The changes are intended to reduce duplication, allow different sources of evidence to be combined and provide clearer expectations, particularly for high-seas fisheries.

Revised **information** requirements for species components

Reference in the DRAFT Standard v4.0

- SA3.1 “General requirements in Principle 2”
- SA3.4 “General requirements for information PIs”
- SA3.8 “Fish and invertebrate species information PI” (PI 2.1.3)
- SA3.12 “Bird, mammal, reptile and amphibian species information PI” (PI 2.2.3)
- SA3.15 “Habitats information PI” (PI 2.3.3)
- Links to: Draft Fisheries Standard Toolbox v2.0, Tool B

Background information

Certain information scoring issues in Principle 2 (2.1.3.a/b (Fish and Invertebrate ETP, main, and minor species information adequacy), 2.2.3.a/b (Bird, mammal, reptile and amphibian ETP and non-ETP species information adequacy), 2.3.3.b (Information adequacy for assessment of impacts on habitats) require the use of the Evidence Requirements Framework (ERF). An ongoing review of the ERF has resulted in it being restructured as a set of procedural requirements for assessors to follow when evaluating evidence. The revised ERF is also included in this consultation, and the summary can be found [here](#).

Alongside the revised ERF, changes were made to the language in the Standard for those information scoring issues to ensure coherence between the two documents.

Summary of proposals

In v3.1 of the Standard, a fishery can pass certification without conditions if information is 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 MSC proposes to remove references to “degrees of accuracy” from the scoring guideposts. Instead, assessors will consider accuracy as part of the process within the ERF and the guideposts would centre on whether the information is “adequate to estimate” the fishery’s impact at SG80 and is “adequate to estimate with a high degree of certainty” at SG100.

A key part of this proposal is a new definition for “estimate” in the context of P2 and P3, which reads: “to make a numeric approximation based on quantitative data and relevant qualitative information”. Therefore, a fishery would be required to have at least some quantitative information to enable it to pass at SG80.

Principle 3

Introduction of jurisdictional scoring elements

Reference in the DRAFT Standard v4.0

- SA4.1 “General requirements for Principle 3”
- Links to: Section 7.5 and Annex PB in Draft Fisheries Certification Process v4.0

Background information

In the Standard v3.1 and previous versions, assessment teams must define scoring elements for Principles 1 and 2. However, for Principle 3 (P3), the current requirements do not specify whether assessors can or should define scoring elements. This ambiguity has created challenges in consistently assessing and harmonising fisheries operating under multiple jurisdictions. The proposed changes aim to provide greater clarity and consistency, particularly in cases involving several exclusive economic zones (EEZs) and/or a Regional Fisheries Management Organisation (RFMO).

A related problem in P3 is the absence of clear guidance on which national and international jurisdictions should be included in the assessment. In multi-flag, coastal, or port state fisheries, some relevant parts of the management system may not be fully assessed or may be overlooked. This has also led to challenges in achieving consistent outcomes for P3 as well as credibility risks where relevant parts of management are not being considered.

Summary of proposal

The proposed changes introduce a clearer and more structured approach to assessing Principle 3 in fisheries that operate across multiple jurisdictions.

It is proposed that assessment teams will identify each jurisdiction under which all or part of the Unit of Assessment (UoA) operates as a P3 scoring element. To support this, the UoA definition has been revised to include jurisdictions, such as EEZs, high seas, RFMOs and flag states.

The proposal also clarifies which jurisdictions should be considered as part of the assessment. P3 would be explicitly linked to the jurisdictions identified when defining the UoA, helping to ensure that relevant national or international management systems are identified before scoring begins. Port states would be included as scoring elements only where the port of landing is relevant to monitoring, control and surveillance under PI 3.2.3. Formal, informal and traditional management systems would continue to be considered where relevant.

Teams would then determine which of these jurisdiction scoring elements are relevant to each P3 Performance Indicator (PI) and scoring issue (SI). It is not intended that every jurisdiction is assessed under every PI or SI; applicability depends on the management function being assessed. This is intended to provide a consistent basis for assessing the different national and international management systems that apply to a fishery and to support greater harmonisation between assessments.

It is proposed that the structured scoring element approach is the default method of assessment for P3, but assessment teams would retain some flexibility, where assessing individual jurisdictions separately would not accurately reflect how a particular management system operates. In these cases, the relevant parts of the management system, or the UoA as a whole, may be assessed instead, provided the team explains why the jurisdiction-based scoring-element approach is not appropriate.

The proposed changes are primarily intended to clarify the structure and application of the P3 assessment rather than change the level of performance required. For example, PI 3.1.1.a would continue to require an effective national legal system for all UoAs, together with international cooperation where necessary. Associated guidance would also be updated to support consistent application of the revised requirements.

Clarification of international cooperation

Reference in the DRAFT Standard v4.0

- SA4.3 “Legal and/or customary framework PI (PI 3.1.1)”

Background information

In the Standard v3.1, PI 3.1.1.a requires an effective national legal system and cooperation with other parties “where necessary”. However, the associated requirements distinguish between UoAs that are subject to international cooperation and those that are not, without first establishing when international cooperation is required. This created a risk that a shared-stock fishery with no cooperation could be treated more favourably than a fishery where cooperation exists but is incomplete or ineffective.

The wording of PI 3.1.1.a also created ambiguity around the meaning of “where necessary”. In the Standard v3.1, this wording appears at SG60 and SG80 but not SG100, making it unclear whether it refers to the need for an effective national legal system, the need for cooperation, or both. This may result in different interpretations of when cooperation is required and inconsistent scoring across fisheries operating under similar management circumstances.

Summary of proposal

The proposed changes clarify when international cooperation is required under PI 3.1.1.a. Assessment teams would first determine whether management of the Principle 1 target stock requires cooperation with other parties. Cooperation would be considered necessary where the target stock is shared, straddling, or highly migratory.

The wording of PI 3.1.1.a has also been revised so that “if necessary” applies consistently to cooperation at SG60, SG80, and SG100. This separates the question of whether cooperation is required from the level of cooperation expected at each scoring guidepost, while the requirement for an effective national legal system continues to apply to all UoAs.

The changes are intended to clarify the application of the existing performance requirements.

Section SE

Application of Section SE to non-tuna stocks

Reference in the DRAFT Standard v4.0

- Section SE: “Principle 1 for tuna stocks managed by Regional Fisheries Management Organisations – normative”

Background information

Section SE was introduced in v3 to provide a pathway for fisheries managed by Regional Fisheries Management Organisations (RFMOs) to adopt effective harvest strategies. Such fisheries can face challenges in closing conditions of MSC certification due to the time required for RFMOs to develop and adopt harvest strategies. Section SE aims to resolve these challenges.

Section SE has been applied effectively in RFMO-managed tuna fisheries, but difficulties have been reported in non-tuna fisheries. These revisions therefore focus on addressing the feasibility and applicability of Section SE for non-tuna RFMOs. This followed feedback from assessors and RFMOs that current requirements may prevent well-managed fisheries from achieving or retaining MSC certification. Specifically, Section SE requires Management Strategy Evaluation (MSE) to assess harvest strategy effectiveness, meaning non-tuna RFMOs using other evaluation methods may be unable to meet the requirements even where the strategy is effective.

The MSC is also reviewing the entry requirements for Section SE across all fisheries, including whether a management body must commit to MSE before Section SE can be applied and, if so, what evidence of that commitment is acceptable.

Summary of proposal

The revisions clarify the intended application of Section SE by distinguishing between tuna and non-tuna RFMO-managed fisheries. Section SE has been applied effectively in RFMO-managed tuna fisheries, where it aligns with established approaches to developing harvest strategies. The application of Section SE is less suited to non-tuna fisheries where there are differences in management approaches.

To reflect this, mandatory application of Section SE would be limited to five tuna species currently covered by the approach: albacore tuna, yellowfin tuna, bigeye tuna, skipjack tuna and bluefin tuna. Other RFMO-managed fisheries would be able to apply Section SE

voluntarily where its requirements are appropriate for their management context. Performance expectations at SG100 remain unchanged.

The proposal also removes the Section SE entry requirement (SE 1.1.3), which requires a management body to demonstrate a prior commitment to undertake an MSE before Section SE can be applied. In practice, this can create an additional barrier to using Section SE and may duplicate existing Fisheries Certification Process (FCP) requirements.

Under the FCP, Conformity Assessment Bodies (CABs) already verify the feasibility of Client Action Plans and relevant third-party commitments when conditions are set. Removing the entry requirement would therefore allow these commitments to be verified through the established FCP process, rather than as a precondition for applying Section SE.

Revisions to the Fisheries Standard Toolbox v1.2

Tool A: The Risk-Based Framework

Reference in the DRAFT Toolbox v2.0

- Tool A: The Risk-Based Framework

Background information

The Risk-Based Framework (RBF) is a framework of mandatory tools used to assess and score fisheries in data-deficient scenarios against specific Performance Indicators. The tools include the Consequence Analysis (CA), the Productivity Susceptibility Analysis (PSA), the Consequence Spatial Analysis (CSA), and the Scale Intensity Consequence Analysis (SICA).

Feedback following implementation of v3 of the Standard and Toolbox identified challenges in the application of the Risk-Based Framework. These challenges were amplified by the likelihood that the RBF would be triggered more frequently under v3 and again under v3.1.

Four challenges were initially prioritised:

1. Clarifying how management Performance Indicators are scored when the RBF is used,
2. Improving stakeholder engagement in the RBF,
3. Addressing conditions with the Productivity Susceptibility Analysis (PSA), and
4. Generally improving inefficiencies and inconsistencies.

Minor refinements have been made to address the first two areas. More substantive revisions were made to the latter two areas, including changes to how scores are considered through the RBF, changes to triggering requirements for use of the RBF for P2 species, and other improvements.

Summary of proposals

The RBF will continue to provide a way of assessing fisheries where there is not enough information to use the default assessment tree. The proposed revisions are intended to make the RBF more appropriately precautionary, more efficient and easier to apply consistently, while allowing the best available evidence to inform assessment decisions.

Clarifying when the RBF is triggered

The triggering requirements for the RBF have been revised to clarify that fisheries should be assessed using the relevant default assessment tree wherever sufficient information is available, with the RBF used only where the available information is insufficient to analytically determine the direct effects of the UoA on the applicable scoring element. The revised requirements provide greater clarity on what constitutes sufficient information. This includes defining “analytically determine” as having quantitative or semi-quantitative UoA-related mortality or interaction rates for the scoring element and being able to relate these rates to the population status or recovery objectives for that scoring element. This clarifies that sufficiently robust quantitative or well-supported semi-quantitative information can allow the default assessment tree to be applied, while the absence of such information is what triggers the use of the RBF. The changes therefore establish a clearer information-based threshold for determining when the default assessment approach can be used and when the RBF is necessary.

The triggering requirements have also been updated to align with proposed changes elsewhere in the scheme documents. For bird, mammal, reptile and amphibian species, favourable conservation status will no longer be required to determine whether the RBF is triggered. The requirements also explicitly address key low-trophic-level species under Principle 1. The existing approach for applying the RBF to habitats is largely retained, with the habitat-specific Consequence Spatial Analysis (CSA) tool being simplified to remove unnecessary terminology and complexity.

Improving how RBF results are used in scoring

The way RBF results contribute to the assessment of Principle 2 species and habitats has also been revised. Rather than having the ability to adjust an RBF score for a scoring element up or down by a fixed number of points, assessment teams will consider the RBF risk outcome alongside other relevant and reliable evidence when determining if a fishery meets a higher Scoring Guidepost in the relevant assessment tree.

Where no better evidence is available, the RBF risk outcome will remain the basis for the scoring determination for the scoring element. Where other credible evidence is available, however, it can be considered alongside the RBF outcome. This is intended to make scoring more transparent and avoid situations where an RBF outcome prevents relevant additional information from being taken into account, trapping a species, and in some cases preventing the closure of conditions.

To complement this and ensure rigour is applied when assessing the information used when scoring, the RBF alternative information PIs have been removed, and replaced with the default information PIs and application of the ERF.

The proposal also clarifies how management performance is assessed in the default assessment tree when the RBF has been used.

Making stakeholder engagement more efficient

The process of engaging with stakeholders when the RBF is used has been streamlined. Rather than relying on a separate RBF announcement, relevant RBF information will be incorporated into the main fishery assessment announcement, including information on important data gaps and, where appropriate, draft RBF scores.

Providing this information earlier in the assessment process is intended to give stakeholders a clearer opportunity to contribute relevant information and identify issues with the assessment. The proposals also provide greater flexibility in how assessment teams engage stakeholders and how stakeholders can provide input on the use of the RBF.

Updating the worksheets and aligning with other proposals

Finally, the framework and its supporting worksheets have been updated to reflect the revised species components (fish and invertebrates and birds, mammals, reptiles and amphibians, with ETP embedded within each). The established method for defining habitats has been retained, with some terminology and wording in the habitat-specific tool (the CSA) simplified.

Overall, the proposed changes aim to make the RBF more appropriately precautionary, more efficient and easier to understand and apply consistently, while still ensuring the best available evidence is used to inform an assessment.

Tool B: The Evidence Requirements Framework

Reference in the DRAFT Toolbox v2.0

- Tool B: The Evidence Requirements Framework

Background information

The Evidence Requirements Framework (ERF) is a method for evaluating the information used to assess a fishery's sustainability against the MSC Fisheries Standard. Assessors must use the ERF for specific Performance Indicators within the Standard.

The ERF was a significant new addition to Version 3 of the Fisheries Standard, but multiple issues were identified after it was introduced. These included concerns that the Framework was too complex for assessors to apply and created unintentional barriers to certification for many well-managed fisheries.

The Toolbox Review, which ran from 2024-25 (before being incorporated into the Fisheries Program Revisions workstream), resulted in significant proposed changes to the ERF's structure and requirements. The aim of the review was to clarify the intent of the ERF, simplify its use by assessment teams, and ensure consistency of language between the Standard and the language in the ERF.

Those changes have been maintained in this program of work and are presented again below for public comment.

Summary of proposals

The ERF remains a tool for assessors to evaluate evidence. However, the proposals have refined the scope of the ERF to provide assessors with a clear structure for undertaking and documenting that evaluation. Requirements for fishery performance, such as requirements related to catch monitoring, have been removed and placed back within the Standard.

The redrafted ERF is a set of procedural requirements for assessors to follow when evaluating evidence.

To simplify the process of using the ERF, the proposal removes the multi-step scoring system of the original version, which included specific 'trueness' and 'precision' guideposts as benchmarks of information quality. Assessors are still required to directly consider the accuracy of information available about a fishery. To do this, assessors will consider the objectivity, relevance, completeness, and consistency of information sources and how any potential bias is mitigated. Through these requirements, the core concepts that define

information accuracy are retained in the new proposal without interim scoring guideposts in the ERF.

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

In the revised ERF, information accuracy is a key consideration in the process, which ultimately informs a judgment about the overall adequacy of information to meet the scoring guidepost.

Changes clarify when assessors can apply expert judgement.

The proposal improves transparency around when assessors should apply their expert judgement, given the wide range of real-world fishery contexts. This proposal recognises that a higher level of accuracy is required where a fishery has a greater potential for impact.

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. Conversely, for fisheries where assessors can 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 must be clearly and robustly documented.

Other ERF-derived changes

Compliance scoring issues, both in P2 and P3 (2.3.2.c information on compliance with management requirements for more sensitive habitats and 3.2.3.c compliance information), have been revised to maintain consistency with the ERF. The increasing “degrees of accuracy” for compliance scoring issues have been removed, in favour of whether information is “adequate to estimate” compliance at SG80 and “adequate for a detailed understanding” of fishery compliance at SG100.

These changes aim to highlight that assessors will often need to build a picture of compliance in a fishery using both qualitative and quantitative sources of information. They also seek to acknowledge the complex, sensitive, and often difficult-to-access nature of compliance information – recognising that even some of the world's best monitoring systems may lack highly accurate data on compliance with certain regulations². At the same time, the changes enshrine the need for at least some quantitative compliance data to achieve SG80 without conditions.

² Hønneland, G. 2025. *What do we know about compliance in fisheries?* Marine Stewardship Council, April 2025. [What Do We Know about Compliance in Fisheries?](#)

Revisions to the Fisheries Certification Process v3.1

Revisions to Process Requirements

Defining the Unit of Assessment and Unit of Certification

Reference in the DRAFT FCP V4.0

- 7.5 “Scope of assessment: Defining the UoA and proposed UoC”

Background information

To align with changes proposed elsewhere in the FCP, requirements for defining the Unit of Assessment (UoA) and the proposed Unit of Certification (UoC) have been revised for consistency and clarity.

Summary of proposals

Section 7.5 has been revised to provide a clearer and more structured approach to defining the Unit of Assessment (UoA) and Unit of Certification (UoC). The requirements have been reordered and supported by new guidance to improve consistency with changes elsewhere in the FCP.

The revisions place greater emphasis on clearly identifying the fleets, vessels, groups, or fishing operators included within the UoA and UoC, as this determines the process that applies if additional entities are later added to the certificate (see [additions to the fishery certificate](#)).

The definitions of the UoA and UoC have also been updated to explicitly identify the jurisdiction or jurisdictions under which they operate. This supports the [revised Principle 3 approach](#), where relevant jurisdictions are identified as scoring elements, and provides a clearer basis for determining which management systems should be assessed.

Scoring the Unit of Assessment

Reference in the DRAFT FCP V4.0

- 7.15 “Scoring the UoA”

Background information

As part of the revisions to the FCP, the MSC aims to clarify the scoring process and ensure assessment outcomes are transparent and consistent. This includes clarifying the definitions of scoring elements and where they apply, and considering how assessors should combine different element and unit of assessment (UoA) scores within the same Performance Indicator.

At present, the requirements lead to ambiguity in determining scores and, depending on how calculations are made, could have material impacts on the outcome of a fishery assessment.

The review also considers how scores obtained through the [Risk-based Framework \(RBF\)](#) should be combined with non-RBF scores within the same Performance Indicator.

Summary of proposals

The scoring process has been reorganised and simplified to make it easier to understand and to apply consistently.

Scoring instructions have been tabulated (Table 1). Scores will continue to be determined in five-point increments, and this is made clear in the table of instructions. Assessment teams will evaluate scoring elements against each relevant Scoring Guidepost and then apply the instructions in Table 1 to the scoring elements to calculate the overall score for the Performance Indicator. Explicit definitions for scoring elements and where they apply have been included in the MSC Fisheries Standard. This streamlined process replaces the more complicated two-step approach to scoring that was previously used.

Requirements allowing partial scores and score modification have been removed in favour of the more transparent and clearer approach provided when applying Table 1.

The same streamlined approach will also apply when the Risk-Based Framework is used to score a scoring element and so there is now a single set of instructions to determine overall Performance Indicator scores that applies across the scheme documents.

Overall, the changes proposed to the scoring process are intended to make scoring clearer, more transparent and more consistent across assessments.

Setting conditions

Reference in the DRAFT FCP V4.0

- 7.16 “Setting conditions”
- 7.18 “Client and Peer Review Draft Report”
- 7.28 “Surveillance”
- 7.30 “Reassessment”

Background information

The MSC is considering the process of how assessment teams raise conditions of certification, set deadlines for those conditions, and monitor their progress over time.

Currently, fisheries are allowed five years to resolve conditions, with progress monitored at each surveillance audit. However, because of the length of the reassessment process, the last auditing opportunity to monitor condition progress usually comes at the fourth surveillance audit. This means that in reality, many fisheries only have four years to close conditions before they can enter reassessment.

In exceptional circumstances, assessors are permitted to raise conditions with deadlines that extend beyond the standard five-year timeframe. What comprises “exceptional circumstances” and when these can be applied is, however, currently unclear. Tracking these conditions over time is also challenging, particularly when a fishery has several units of assessment with different conditions and related deadlines.

Requirements will be updated to ensure clear and transparent tracking of conditions over time. Requirements have also been clarified to ensure that the conditions setting process is clear and that assessment teams are confident of when and how extended deadlines can be applied and justified.

Summary of proposals

The proposed changes make conditions easier to identify, track and understand throughout a fishery’s certification. Each condition will have a unique number that remains unchanged over time. Requirements standardising how condition deadlines should be presented have been added.

The process of raising conditions and the associated responsibilities have been clarified. Assessment teams will set the condition and preliminary deadline but will no longer set the milestones before handing over to the client for review. Rather, fishery clients will develop the actions and expected outputs to address the condition in their Client Action Plan, and

following receipt of the Client Action Plan, the assessment team will use this information to finalise the condition deadline and establish clear verification milestones for checking progress.

The standard timeframe for conditions to be closed remains less than or equal to five years. It has been clarified that exceptional circumstances only constitute those which are outside of the client's control. They may be applied by the assessment team to extend a condition deadline longer than five years only when the condition is first set and must be subject to peer review. It was clarified that the exceptional circumstances allowance cannot later be used simply to extend a deadline or avoid suspension.

Condition monitoring has also been simplified. Progress will be described as milestones being either "met" or "not met", rather than using the previous "on target" and "behind target" language. Clients may revise their Client Action Plan where remedial action is needed, but failure to meet a milestone at consecutive audits will result in suspension.

Finally, a fifth surveillance audit has been introduced for fisheries that still have open conditions after the fourth audit, helping ensure that longer-term and mid-cycle conditions continue to be checked annually (see [clarifications to the reassessment process](#)).

Overall, the changes proposed to conditions aim to improve transparency and accountability while keeping the process practical and credible.

Announcement Comment Draft Report (ACDR) at reassessment and clarifications to the (re)assessment process

Reference in the DRAFT FCP V4.0

- 7.30 “Reassessment”

Background information

Following feedback from the assessment community and fisheries stakeholders, the MSC is considering whether an Announcement Comment Draft Report (ACDR) should still be required during reassessment, with the aim of making the process more efficient. Other aspects of the reassessment process and timeline, such as the need for an overlapping reassessment site visit and fourth surveillance audit, have come under revision as well.

Summary of proposals

The proposed changes aim to make reassessment more efficient, while providing clearer expectations for planning, timing and ongoing surveillance.

The Announcement Comment Draft Report (ACDR) will no longer be required for reassessment. Instead, it is proposed that the CAB will publish a reassessment plan and change analysis at the point of reassessment announcement, using a dedicated template (which forms part of the announcement), to explain what has changed since the previous assessment and which aspects of the assessment will need to be revisited.

The reassessment timeline has also been made more structured. As previously required, condition deadlines are anchored to the certificate anniversary to provide consistency and transparency. However, to address fisheries that still have open conditions after the fourth surveillance audit, it is proposed that a fifth surveillance audit is introduced where needed (e.g., fisheries with condition deadlines that are five years or longer or fisheries that have a condition raised mid-certification with the deadline in the subsequent reassessment period). This audit would be separate from the reassessment process and would not need to be completed within the reassessment deadline. It will be run as a normal surveillance audit, where the six-month timings still apply.

Overall, the revisions are intended to ensure efficiency of the reassessment process, improve transparency around the scope of reassessment, create a clearer and more predictable process for CABs and fisheries, and improve credibility through ensuring the annual surveillance of conditions.

Traceability and alignment with the MSC Chain of Custody (CoC) Review

Reference in the DRAFT FCP V4.0

- 7.17 “Determination of traceability and product eligibility”

Background information

When assessing a fishery against the MSC Standard, CABs primarily define what is to be covered by the certificate as the Unit(s) of Certification. When reviewing the traceability systems within a given fishery, the CAB must also determine the parties and categories of parties eligible to use the certificate for Chain of Custody purposes.

Traceability requirements within fishery assessments play an important role in safeguarding the integrity of MSC certified product through the supply chain. However, the type of information collected, and how it is considered, currently varies across assessments, leading to inconsistent determinations of what falls within a certificate's scope. This, in turn, can create uncertainty around where CoC coverage begins.

The revisions aim to bring about further standardisation of the traceability information gathered during fishery assessment. They also aim to clarify where CoC starts, and how the CAB determines which parties and activities should be covered by the fishery's certificate. These changes will also be strengthened by the current [MSC Chain of Custody Standard review](#).

Summary of proposals

The proposed changes clarify how traceability should be assessed within a fishery and where responsibility transfers from fishery certification to Chain of Custody (CoC) certification.

Under the revised approach, the fishery certificate would cover activities up to landing, with CoC certification beginning at landing by default, as this is where most fishery compliance systems end. With this change, the MSC intends to clarify the point of ‘handover’ between the fishery assessment and CoC audit, and therefore the point of entry into further certified chains of custody. This provides complete visibility on traceability and eligibility to enter the supply chain to CoC auditors.

Where traceability risks justify it, the CAB can use expert judgment based on identified risks to require CoC certification to begin earlier, for example at transshipment. This is intended to establish a clearer and more consistent boundary between fishery certification and CoC certification while allowing flexibility for fisheries with different operational arrangements.

As before, CABs are required to assess how product moves through the fishery, the traceability risks that arise before landing, and the controls in place to manage those risks. The assessment will also consider relevant landing points, the information available to the first CoC certificate holder, and whether effective arrangements are in place to maintain separation and product integrity at the handover between the fishery and CoC. These requirements have been clarified in the proposal.

Traceability determinations in the assessment will be based on proportionate, evidence-based evaluation of the risks and controls relevant to the fishery certificate. Detailed assessment methods are set out in guidance, including specific fishery Key Data Elements (KDEs), helping to reduce duplication between the fishery and CoC assessments while retaining assurance over the integrity of certified product.

The revisions also clarify how traceability determinations should be recorded and reported, including on the fishery certificate and in the relevant reporting templates. A new template, the Fishery Certificate Template, will ensure transparency for first buyers and CoC auditors.

The proposed changes clarify that the eligibility date for certified product from newly certified and continuously certified Units of Certification to enter further chains of custody as the date of the Public Certification Report (PCR) publication. The changes also introduce an expedited audit process where a previous negative traceability determination needs to be reconsidered.

Inseparable catch (known previously as inseparable and practicably inseparable catch)

Reference in the DRAFT FCP V4.0

- 7.17 “Determination of traceability and product eligibility”

Background information

The MSC is revising the general requirements for inseparable or practicably inseparable (IPI) catches to clarify how they should be treated within the certification system and to strengthen assurance around their entry into certified supply chains.

The current requirements do not always provide sufficient clarity on how IPI catch percentages should be calculated, how relevant IPI species should be assessed under Principle 2, or how IPI catches should be identified and managed once they enter chain of custody. This can create inconsistency in assessment and increase the risk that inseparable catch is not sufficiently visible or traceable within certified product flows.

The revisions therefore aim to establish a clearer and more transparent approach to IPI eligibility, linked to traceability and the point at which product enters chain of custody. They also seek to ensure that the presence of IPI catch is clearly reflected in certification information, that traceability expectations are strengthened, and that appropriate sustainability safeguards apply where IPI species meet the relevant criteria for assessment under Principle 2.

Summary of proposals

Requirements for the assessment of inseparable catch were previously located in a standalone annex of the Fisheries Certification Process (FCP) (Annex PA) and in the FCP process requirements. The MSC proposes to remove these requirements from Annex PA and the previous ‘IPI’ section of the FCP process requirements. Instead, the changes integrate the assessment of inseparable catch entirely into section 7.17, “Determination of traceability and product eligibility”, as requirements on the eligibility of that catch to enter further certified chains of custody.

This change intends to clarify that inseparable catch should be treated as a controlled eligibility question, linked to considerations of the traceability of the certified product and transparency of the fishery certificate.

Through the proposal, the MSC affirms that Principle 1 (P1) remains the default route for assessing inseparable catch. There are, however, cases where catches of non-target stocks assessed under Principle 2 (P2) are inseparable from the P1 target stock. Any species in P2

that have been categorised as ETP and/or 'out-of-scope' (a bird, mammal, amphibian, or reptile species) cannot be considered for inseparable catch determination. In other words, only non-ETP fish and invertebrate stocks assessed under P2 can continue within these requirements.

Eligibility of P2 stocks to enter further certified chains of custody is determined by the following criteria:

- The catch meets specific criteria for determining its biological or operational inseparability from the target stock.
- There is evidenced justification for not including and assessing the stock under Principle 1.
- The catch does not exceed the upper limit of 15% by weight of the combined relevant landings of those species/stocks and the P1 target stock.

The revisions include additional guidance on how the $\leq 15\%$ catch calculation should be determined.

Inseparable catch that has been determined eligible must be identified in the assessment report and the new Fishery Certificate Statement. New requirements stipulate that CABs must continue to check eligibility at reassessment.

The above pathway to determining the eligibility of inseparable catch to enter the supply chain is intended as a limited exception for scenarios that meet explicit criteria – not an alternative to assessment under P1. As a whole, these requirements intend to improve the transparency, traceability, and sustainability determinations of inseparable catch in the MSC program.

Additions to the fishery certificate (adding other eligible fishers, expedited audits, and scope extensions)

Reference in the DRAFT FCP V4.0

- 7.5 “Scope of assessment: defining the UoA and proposed UoC”
- 7.26 “Addition of vessels to the fishery certificate (amending the UoC)”
- 7.29 “Expedited audits”
- Annex PA “Scope extension assessments – normative”

Background information

The current requirements for adding “other eligible fishers”, adding vessels and conducting scope extensions overlap, resulting inconsistent interpretation and application by CABs and a lack of transparency.

The MSC is thus working on revisions to clarify the process for adding other eligible fishers or entities to a certificate. This will ensure assessors take a more consistent approach.

These revisions aim to resolve longstanding confusion between the various pathways available to extend the certificate and to extend the scope of assessment, which have included gap analyses, expedited audits, and scope extensions.

Summary of proposals

The proposed revisions aim to clarify the pathways for adding eligible vessels or other entities to an existing MSC certificate (extending the Unit of Certification), and to distinguish these additions more clearly from those that require a scope extension (extending the Unit of Assessment).

The process of adding to the certificate is now based on whether the proposed addition falls within the defined Unit of Assessment (UoA) and whether it has already been assessed.

Four pathways for adding a vessel to a certificate have been developed and codified in the proposed requirements.

- 1) In the first pathway, a vessel that was assessed as part of the original assessment can be added directly to the certificate. Before doing so, the CAB must check whether the proposed addition meets the scope requirements in the Standard. Once this is determined, the Fishery Certificate Statement will be updated, which includes a check on traceability.

- 2) In the second pathway, where a vessel was not previously assessed but falls within the existing UoA definition, the CAB will determine whether its addition would need an expedited audit. If it does not trigger an expedited audit, the vessel can be added to the certificate and its impacts assessed at the next surveillance audit.
- 3) The third pathway applies if an expedited audit would be triggered. The addition must be assessed and found to meet the Standard *before* it can be added. This assessment can either be done through an expedited audit, or the certificate holder can wait until their next surveillance audit.
- 4) The final and fourth pathway applies where the addition clearly falls outside the existing UoA as it was defined. In this case, a scope extension is required. For more information about the scope extension requirements, please see the [summary of proposals for Annex PA](#).

To support the proposal, the UoA and UoC requirements have been reordered, with additional guidance provided on how they should be defined. Particular emphasis has been placed on clearly defining the vessels, fleets, groups, or fishing operators included within the UoA, as this definition determines the process that applies when vessels are subsequently added to the certificate.

The separate concept of “other eligible fishers” has been removed to reduce confusion. Fishers or vessels included within the UoA but not initially included within the UoC can instead be identified through the relationship between the two. The separate “gap analysis” process, previously used to add “other eligible fishers”, has also been removed and replaced by clearer requirements that direct CABs to the appropriate assessment pathway.

Further revisions have been made to 7.29 “Expedited audits” to clarify that expedited audits are triggered where there is a loss of conformity with the scope requirements of the Fisheries Standard.

In addition to these changes, the MSC is proposing the use of a mandatory template when submitting a vessel list (see [Vessel Information Template](#) in this document). This template will ensure consistency when scope eligibility and traceability reviews are conducted at surveillance audits if there are changes to the vessel list(s).

The proposed revisions make the addition of vessels to an existing certificate clearer, more consistent, resulting in increased transparency.

Certificate splitting

Reference in DRAFT FCP v4.0

- 7.27 “Merging and splitting fishery certificates”

Background information

There are some cases where Units of Certification (UoCs) sharing one certificate need to be placed on separate certificates for aspects of their certification to be managed independently. However, this process of ‘certificate splitting’ does not have a formalised pathway in the FCP v3.1 or previous versions.

To address situations where it is appropriate to split certificates, MSC intends to create a clear and consistent process.

Summary of proposals

In this proposal, FCP section 7.28 “Merging fishery certificates” has been expanded to include the option of also splitting fishery certificates. Certificate splitting will be required to take place at surveillance audits to ensure transparency for the MSC to conduct technical oversight and for interested stakeholders to submit comments. Surveillance audits also provide the benefit of reporting on changes in scores, conditions, traceability, and other aspects of certification, so it is a clear and efficient point in time to propose a certificate split rather than a separate reporting mechanism.

The requirements explicitly state that Unit(s) of Assessment, and therefore scores and conditions, cannot be split using this process.

Revisions to Annex PA

Scope extension requirements

Reference in the DRAFT FCP V4.0

- Annex PA “Scope extension assessments – normative”

Background information

See background information for [Additions to the fishery certificate](#).

Summary of proposals

Relocation of scope extension requirements from Annex PD to Annex PA

In v3.1 and previous versions of the FCP, Annex PA set out requirements for inseparable catch (known as IPI). The requirements for inseparable catch have been removed from this standalone annex of the FCP, and instead addressed as a question of eligibility linked to traceability requirements and entry into further certified chains of custody. For more information, see the [summary of proposals for inseparable catch](#).

To keep the format of FCP annexes consistent with previous versions, the requirements for scope extensions have been moved to Annex PA from its previous location at Annex PD. The previous Annex PE, for “Transition assessments”, has been removed entirely, so the final annex of the FCP will be Annex PC, “Fishery team leader, team member, team and peer reviewer qualifications and competencies”.

Revisions to requirements for scope extension assessments

To further distinguish additions to the fishery certificate from extensions of the scope of assessment, the MSC has made several clarifying revisions to Annex PA. In the first instance, all requirements for scope extension assessments in the FCP have been moved to and consolidated in Annex PA.

References to a “gap analysis” step, which had previously been associated with scope extension assessments as the primary step, have now been removed. Gap analyses were initially intended to map which assessment components and scoring elements were present between the existing and proposed UoA. If the assessment components and scoring elements were identical between the existing and proposed UoA, then these could be added to the certificate. If not, then a scope extension was needed. Later, an Interpretation was published to allow for additions of vessels where the assessment components and scoring elements were not identical, but the CAB determined that the addition would not impact scoring. However, this resulted in inconsistency between various CABs and confusion

between what could or could not be added. The proposed revisions to 7.28 “Additions to the fishery certificate” – and to the process of defining the scope of assessment in 7.5 – introduce clearer lines around what is included within the UoA definition, removing the need for a gap analysis step.

Additional minor edits and clarifications have been made to Annex PA to reduce complexity.

Revisions to Annex PB

Harmonisation process and outcomes

Reference in the DRAFT FCP V4.0

- 7.8.3 “Criteria for identification of overlapping UoAs”
- Annex PB “ Harmonised Units of Assessment – normative”

Background information

The harmonisation process is applied to overlapping fisheries to ensure assessment outcomes are consistent. The review will clarify how assessors should apply the process, including establishing the level at which fisheries should be harmonised.

This includes considering whether harmonisation should occur at the Performance Indicator or Scoring Issue level, and whether it should apply to specific scores or just to the overall pass/fail outcome. It will also address difficulties in harmonising Principle 2, and the lack of clarity in applying the process to Principle 3.

The review will also consider whether to revise the current process, where the lowest score is awarded if assessors cannot agree how to consolidate scoring.

Summary of proposals

The proposed revisions substantially update Annex PB to make harmonisation simpler, more focussed and less burdensome, while ensuring that overlapping fisheries reach consistent assessment outcomes where this is important.

The triggering of harmonisation has been made clearer. Harmonisation will be triggered where fisheries have overlapping units of assessment (UoAs) targeting the same Principle 1 (P1) stocks or with the same Principle 2 (P2) scoring elements. Overlapping UoAs will be identified during the assessment process, with clearer requirements for communicating the timing and outcomes of harmonisation.

In the proposal, the scope of harmonisation differs by Principle. For P1, most Scoring Issues (SIs) must be harmonised, except where an SI is specific to an individual UoA. The determination of key low-trophic-level stocks must also be harmonised. For P2, harmonisation focusses on species categorisation and selected Outcome SIs, including productivity attribute scores where the Risk-Based Framework (RBF) is used to score a scoring element. For P3, harmonisation is limited to PI 3.1.1(a) and PI3.2.3(a), focussing effort on areas where consistency between overlapping fisheries is most important.

The proposal clarifies that harmonisation should ensure that the same SI reaches the same Scoring Guidepost (SG) across overlapping UoAs. Condition deadlines must be harmonised while milestones can remain specific to each fishery (i.e., harmonisation of milestones is not required). In this way, the harmonisation outcome is clarified. Clearer requirements for handling differences between fisheries are also provided. Demonstrable differences between UoAs can be taken into account where there is evidence that the fisheries genuinely differ in a way that affects the assessment outcome.

The updated requirements clearly distinguish between annual and expedited harmonisation. Annual harmonisation provides a routine process for agreeing outcomes, while expedited harmonisation can be triggered when new information materially changes an assessment outcome, such as where a Performance Indicator score falls below 60 or a Principle score falls below 80.

Finally, the proposal changes and strengthens the approach to harmonisation disagreements. Rather than applying a “lowest score wins” approach, as is the current process, a new mechanism has been developed whereby unresolved disagreements can be escalated to independent reviewers appointed by the [MSC’s Peer Review College \(PRC\)](#). This escalation will only happen in the case of an unresolved disagreement among the assessment teams involved in harmonisation.

The proposals aim to improve transparency by making the identification of overlapping UoAs, the timing of harmonisation and the resulting decisions clearer to stakeholders, while avoiding unnecessary additional assessment work. Overall, the revised approach is intended to achieve meaningful consistency between overlapping fisheries without requiring harmonisation where differences between fisheries can be demonstrated.

Revisions to Annex PC

Assessment team leader competencies

Reference in the DRAFT FCP V4.0

- Annex PC, “Fishery team leader, team member, team and peer reviewer qualifications and competencies – normative”

Background information

As part of the revisions to the FCP, the MSC aims to clarify whether an assessment team leader must have worked previously as a Principle expert.

Summary of proposals

The proposed changes clarify the qualification and competency requirements for MSC fishery assessment Team Leaders and broaden the pathways through which individuals can qualify for the role.

Rather than requiring previous experience as a Principle 1, 2 or 3 expert, prospective Team Leaders would be required to shadow an MSC full assessment and then act as Team Leader on an assessment while being witnessed by an experienced MSC Team Leader. This provides a practical route for demonstrating competence in the tasks and responsibilities of the Team Leader role.

The competency requirements have also been revised to focus more explicitly on the skills needed to lead an assessment, including planning and allocating work, engaging with stakeholders, managing the assessment process and assessment team, resolving conflicts, and ensuring stakeholder contributions are captured in assessment reports.

These changes are intended to make the Team Leader role accessible to suitably experienced auditors, CAB staff and managers, and Principle experts from a wider range of backgrounds, provided they can demonstrate the required competencies. They also remove the previous academic and fisheries-sector experience requirements and the need for accreditation-body oversight of an individual’s first assessment as Team Leader.

Revisions to MSC Reporting Templates

The MSC has streamlined reporting templates across the assessment and reassessment processes. This aims to improve clarity, ensure consistency across templates, and improve the usability of reports and worksheets for assessors, fisheries, stakeholders, Peer Reviewers, and other readers.

Changes to the templates have also been made to align with revisions to the Standard and Fisheries Certification Process..

In total, 12 templates have been updated, four templates have been removed, and one additional template was added – the Certification Statement.

Fishery Assessment Template

Summary of proposals

Front page

The front page has been streamlined to present key assessment information in a clearer, more accessible format. Information that was previously distributed throughout the report has been consolidated into tables where appropriate, making important details easier for readers to locate.

Unit of Assessment tables

The Unit of Assessment (UoA) tables have been revised to support clearer and more consistent identification of UoAs throughout the report. A UoA name has been included to help readers distinguish between multiple UoAs and support consistent references across the assessment. Information on the geographical area has been removed in line with corresponding changes to the UoA definition in the Fisheries Certification Process.

Unit of Certification tables

Information relating specifically to Units of Certification (UoCs) has been consolidated toward the end of the report, supporting clearer separation between assessment information and certificate-related information, which is now found in the Certification Statement. The report will also include a narrative description of 'Access to Certification' which references the UoC information provided at the end of the report.

Scoring tables

The scoring tables have been redesigned to support the assessment of multiple UoAs while reducing unnecessary repetition. Assessors will be able to provide shared scoring rationales where UoAs are aligned and identify exceptions where relevant. Scoring rationales are presented separately from the scoring tables themselves, providing greater flexibility for the

inclusion of supporting text, tables and figures. Relevant assessment requirements are also signposted to assist assessors in applying the Standard consistently.

For the Announcement Comment Draft Report, information that was previously repeated within individual scoring tables has been consolidated into an earlier section of the report, further simplifying the presentation of assessment information.

Supporting evidence

The former Background sections have been reframed as Supporting Evidence sections. These provide a dedicated place for information that supports assessment conclusions at the Principle level, including figures, tables and evidence that may otherwise need to be repeated across several scoring rationales.

Scoring rationales will continue to contain all information necessary to substantiate individual scores, while the separate Overview of the Fishery section will retain broader contextual and historical information.

Traceability section

The traceability section has been reorganised and moved toward the end of the report so that key certification and traceability information can be more readily used in the Certification Statement. Revised traceability tables provide a more consistent presentation of information about access to the certificate, eligible vessels and other entities, points at which certified product may enter the Chain of Custody, and any applicable product eligibility requirements.

Condition tables

Condition tables have been reformatted and retained in the appendices. The revised structure is intended to improve readability and make it easier to transfer relevant condition information into subsequent surveillance reporting without unnecessary duplication.

Reporting stage

Information explaining the current stage of an assessment will be presented in a standardised table rather than through editable boilerplate text. This will provide stakeholders with a clearer explanation of where the assessment sits within the certification process, what activities are taking place, and what opportunities exist for stakeholder participation.

Peer review

Peer review information has been moved to the appendices alongside stakeholder comments, providing a more consistent location for external input received during the assessment.

Recommendations

The terminology used for non-mandatory observations made by assessment teams is being revised to distinguish these more clearly from formal consultation or certification requirements. The template will provide a dedicated place for assessors to record opportunities for improvement where appropriate, while recognising that these are separate from conditions of certification.

Principle 2 catch composition

A dedicated location has been introduced for reporting relevant catch composition information within Principle 2. This provides greater consistency in how this information is presented while allowing assessors flexibility where catch composition is not the principal information used to determine scoring outcomes.

Reference points

The separate Reference Points table previously associated with PI 1.1.1 has been removed. Relevant reference point information will instead be incorporated directly into the applicable scoring rationale, where it can be presented alongside the evidence and reasoning supporting the score.

Stakeholder Comments Template

Summary of proposals

The Stakeholder Comments Template has been simplified to make it easier for stakeholders to provide comments and for assessment teams to incorporate them into assessment reports. Stakeholders can identify the Performance Indicators relevant to their comments rather than navigating a worksheet containing every possible Performance Indicator.

The template also supports multiple languages and includes a Microsoft Word-friendly output to facilitate transfer of comments into assessment reports.

Its structure has been standardised for use during surveillance audits as well as initial and reassessments.

Certification Statement Template

Summary of proposals

The Certification Statement will provide a consolidated source of the key operational information needed to understand how a fishery certificate can be used.

Certificate-related information will be drawn together from the assessment report, including the Units of Certification, vessels and other entities eligible to access the certificate, eligible landing points and other relevant locations, the point at which Chain of Custody begins, and

any specific requirements determining whether products are eligible to be sold as MSC certified.

The Traceability section and associated tables have been restructured to support the consistent preparation of this statement and make the relevant information easier for certificate holders, first buyers, Chain of Custody auditors and other users to access.

Scoring Worksheet

Summary of proposals

The MSC Scoring Worksheet has been revised to allow assessment teams to score and record information for multiple UoAs within a single worksheet. A Word-friendly output has also been introduced to make it easier to transfer completed scoring information into assessment reports. The structure retains the flexibility needed to accommodate the different combinations of Scoring Issues required under the MSC Fisheries Standard.

Fishery Assessment Announcement Template / Reassessment Plan

Summary of proposals

The announcement documentation has been expanded to include the announcement of the use of the Risk-Based Framework (RBF) in an assessment. A dedicated Reassessment Plan for fisheries entering reassessment has also been included in the Announcement Template. The plan will summarise relevant condition history and identify areas where scores have changed, or may reasonably be expected to change, since the previous assessment. This is intended to help assessment teams and stakeholders understand the areas requiring particular attention during reassessment and support a more focused assessment process. The plan will be populated in place of the publication of an Announcement Comment Draft Report at reassessment (see [changes to the reassessment process](#)).

Client Information Request Template (previously 'Client Document Checklist')

Summary of proposals

The Client Document Checklist has been renamed the Client Information Request and substantially reformatted to provide a clearer and more useful mechanism for collecting information from clients. Questions have been reorganised to reduce duplication between overlapping areas of the Fisheries Standard and to make the information request easier for clients to understand and complete.

Removal of Client Action Plan

Summary of proposals

The separate Client Action Plan template will be removed. Clients will instead provide their responses to conditions directly within the relevant Fishery Assessment Report, avoiding duplication and keeping condition information and planned actions together.

Surveillance Audit Template

Summary of proposals

The Surveillance Reporting Template has been updated to better reflect the purpose and structure of surveillance audits. The template prioritises information that is most relevant to readers when reviewing developments since the previous assessment. Its front page provides a concise overview of key information that may change over the certification period, allowing users to identify significant updates more quickly.

Vessel Information Template

Summary of proposals

A new Vessel Information Template has been developed to standardise the collection and reporting of vessel information where an MSC-certified fishery represents only a subset of a wider fleet. The template is intended to make vessel information more accessible and usable for stakeholders while supporting greater consistency and transparency across the MSC programme.

Minor corresponding changes have also been made to the Fisheries Certification Process to ensure that the necessary vessel information is collected and reported in the required format.