



Fisheries Standard Review

Key Low Trophic Level Stocks Review Project

Impact Assessment Report

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1. PROBLEM STATEMENT

In 2011, the MSC introduced new requirements within the Fishery Standard relating to the identification and management of key Low Trophic Level (LTL) stocks. The intent of key LTL requirements is to ensure that these stocks are assessed against their potential ecosystem importance when applying for certification against the MSC Standard, and that the specific higher management requirements only apply to those stocks recognised as 'key' LTL.

Results of a review of the requirements demonstrate the requirements remain robust and consistent with best practice so proposed revisions in this FSR are focused on clarifying intent and incorporating existing interpretations into guidance. The business-as-usual scenario would be one in which intent is not clarified and existing interpretations are not incorporated into guidance. The development of a tool to assist CABs with identification of key LTL species by calculating the proportional connectance (PC) and supporting role to fishery ecosystems (SURF) will be addressed outside the FSR and made available in MSC's Tool Box. The policy direction was approved by TAB in December 2019.

2. OBJECTIVES

The objectives of this project are to ensure identification of key LTL stocks is consistent across CABs, the requirements are clear, applied as intended and remain consistent with best practice.

3. OPTIONS

The business-as-usual option (option 0) as well as an alternative (option 1) are described in this section.

3.1. Option 0 – business-as-usual

Option 0 is the business-as-usual scenario.

3.2. Option 1 – integrate interpretations and address logged issues

Option 1 is to integrate interpretations and address logged issues. Specifically, the following changes are proposed:

- Remove 'trophic level' as a criterion for identification of key LTL
- Remove the requirement to review determination of key LTL at each surveillance audit
- Update the requirement for PI 1.1.1A so that either spawning stock biomass (SSB) or total biomass (B) can be used as reference points*

*The requirements for PI 1.1.1A refer to the use of SSB when interpreting reference points for key LTL stocks. The guidance refers to total biomass (B). An [interpretation](#) was issued in 2018 that allows for the use of either indicator. This was approved by TAB at the December 2019 meeting,

but further concern about the use of either indicator was raised at the TAB/STAC meeting in September 2021.

4. SUMMARY OF IMPACTS

The positive and negative impacts of each of the options are outlined below.

4.1. Option 0 – business as usual

4.1.1. Positive impacts

The positive impacts of a business-as-usual situation are that the change (or lack thereof) would be feasible (technically, financially, management-wise) to fishery partners and would maintain accessibility and retention.

4.1.2. Negative impacts

The negative impacts of a business-as-usual situation is that the change (or lack thereof) fails to meet the MSC's intent, is not effective at resolving the issues consistently and reliably, is not acceptable to stakeholders, does not simplify the standard, and is not auditable by assessors.

4.2. Option 1 – integrate interpretations and address logged issues

4.2.1. Positive impacts

Removing the 'trophic level' as a criterion for identification of key LTL is believed to improve clarity and auditability and remove redundancy. This clause (SA2.2.9.b.ii) was identified as unclear during pilot testing and redundant with the preceding criteria that the species feeds predominantly on plankton.

Additionally, removing the requirement to review determination of key LTL at each surveillance audit is expected to improve auditability by keeping process requirements in the FCP (review of new information is already covered in the FCP).

More generally, the expected impacts of this option are that the change would be effective at meeting the MSC's intent, would effectively resolve issues consistently and reliably, be acceptable to stakeholders, and would be auditable by CABs.

4.2.2. Negative impacts

A possible negative impact of this option would be that since SSB and B are not always interchangeable, the current impact of this proposed change is unknown. This proposed change may affect the accessibility and retention of fisheries in the MSC program, including those seeking certification in the future as well as menhaden fisheries already certified.

5. IMPACT ASSESSMENT LEVEL 0 (IA0)

The 2 options for the key LTL project were assessed against the 6 impact types: effectiveness, acceptability, feasibility, accessibility and retention, simplification, and auditability. The results are summarized in Table 1 below.

Table 1. Impact assessment of Options 0 and 1.

Impact Types	Description	Option 0 (business-as-usual)	Option 1
Effectiveness	<i>Is the change effective at meeting the MSC's intent?</i>	N <i>The review phase showed requirements needs clarification in some instances</i>	Y <i>Some interpretations will have a greater impact than others</i>
	Please explain your answer and rationale – following the guidelines in Step 4		
	Please state whether you agree/disagree with the following statement: <i>The option seems effective at resolving the issue(s) consistently and reliably.</i>	2 = Disagree	4 = Agree
Acceptability	<i>Is the change acceptable to stakeholders?</i>	N	Y
	Please explain your answer and rationale – following the guidelines in Step 4		
	Please state whether you agree/disagree with the following statement: <i>The option seems acceptable to stakeholders</i>	2 = Disagree	4 = Agree
Feasibility	<i>Is the change feasible to fishery partners?</i>	Y	Y
	Please explain your answer and rationale – following the guidelines in Step 4		
	Please state whether you agree/disagree with the following statement: <i>The option seems technically feasible for fishery partners</i>	4 = Agree	4 = Agree
	Please state whether you agree/disagree with the following statement: <i>The option seems affordable for fishery partners</i>	4 = Agree	4 = Agree
	Please state whether you agree/disagree with the following statement: <i>The option seems possible given the management contexts of fishery partners</i>	4 = Agree	4 = Agree

	Please state whether you agree/disagree with the following statement: <i>The option seems doable within 5 years for fishery partners</i>	5 = <i>Completely agree</i>	5 = <i>Completely agree</i>
Accessibility and retention	<i>Does the change affect the accessibility and retention of fisheries in the MSC program?</i> Please explain your answer and rationale – following the guidelines in Step 4	N	Y
	Please state whether you agree/disagree with the following statement: <i>The option seems accessible to fisheries seeking certification in the future</i>	4 = <i>Agree</i>	4 = <i>Agree</i>
	Please state whether you agree/disagree with the following statement: <i>The option seems accessible to currently certified fisheries</i>	4 = <i>Agree</i>	4 = <i>Agree</i>
Simplification	<i>Does the change simplify the Standard?</i> Please explain your answer and rationale – following the guidelines in Step 4	N	N
	Please state whether you agree/disagree with the following statement: <i>The option seems to simplify the Standard</i>	3 = <i>Neither agree nor disagree</i>	3 = <i>Neither agree nor disagree</i>
	<i>Is the change auditable by assessors?</i> Please explain your answer and rationale – following the guidelines in Step 4	Y <i>There were 5 interpretations requested, suggesting it is not currently auditable by CABs</i>	Y
Auditability	Please state whether you agree/disagree with the following statement: <i>The option seems to be auditable by CABs</i>	2 = <i>Disagree</i>	4 = <i>Agree</i>

6. DISCUSSION AND CONCLUSION

Following the results of the IA0, it was decided that option 1 was the preferred option and was taken forward for further development. A summary of option 1 is as follows:

- SA2.2.9.b.ii: remove 'trophic level' as a criteria for identification of key LTL.
- SA2.2.11: remove requirement to review determination of key LTL at each surveillance audit.
- SA2.2.13: possibly update this requirement to allow for either SSB or B to be used as reference points. Feedback is requested from TAB on which indicator is most appropriate to use – the clause will be updated based on this feedback.