



Proposed Revised MSC Fisheries Standard

Consultation Summary Report

May 2022

Table of Contents

Purpose and scope of this report	4
Background	5
Participation overview.....	5
Annex I: Changes to the Fisheries Certification Process including those related to the harmonisation of assessments.....	8
Annex II: Changes to the scope of the MSC program.....	10
Annex III: Clarifying assessment of dynamic fisheries	12
Annex IV: Clarifying assessment of inseparable and practically inseparable stocks in a catch	14
Annex V: Clarifying assessment of key low trophic level stocks	16
Annex VI: Clarifying best practice for reducing impacts on endangered, threatened, and protected species	18
Annex VII: Clarifying requirements for modified assessment trees	21
Annex VIII: Clarifying the assessment of squid, crab and octopus fisheries.....	23
Annex IX: Ensuring ecosystem performance indicators are clear and consistently applied	25
Annex X: Ensuring effective fisheries management systems are in place.....	27
Annex XI: Ensuring habitat performance indicators are clear and consistently applied.....	29
Annex XII: Ensuring the Risk-based Framework continues to deliver precautionary and consistent assessments for data-limited fisheries	31
Annex XIII: Identifying further solutions to ensure MSC certified fisheries are not involved in shark finning	33
Annex XIV: Making the MSC Fisheries Standard more efficient	36
Annex XV: Reviewing Principle 1 with a focus on harvest strategies	39
Annex XVI: Supporting the prevention of gear loss and ghost fishing.....	43
Annex XVII: Participation	46
Annex XVIII: Feedback tables.....	57
Annex XIX: Letter responses	58



Glossary of abbreviations and technical terms

CAB	–	Certification Assessment Body
CITES	–	Convention on International Trade in Endangered Species
CMS	–	The Convention on Migratory Species
ETP	–	Endangered, Threatened and Protected
FAO	–	The Food Agriculture Organisation of the United Nations
FCP	–	Fisheries Certification Process
FNA	–	Fins Naturally Attached
FSR	–	Fisheries Standard Review
IPI	–	Inseparable or Practicably Inseparable
IUCN	–	International Union for Conservation of Nature
KLTL	–	Key Low Trophic Level
MSY	–	Maximum Sustainable Yield
P2	–	Principle 2 (in reference to the MSC Fisheries Standard)
RBF	–	Risk-Based Framework
VME	–	Vulnerable Marine Ecosystem

This is a working paper, and hence it represents work in progress. This report is part of ongoing policy development.

The views and opinions expressed in parts of this report are those of stakeholders and do not necessarily reflect the official policy or position of the Marine Stewardship Council.

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Purpose and scope of this report

Every five years, the Marine Stewardship Council (MSC) initiates a [Fisheries Standard Review](#) to help ensure our assessment and certification system remains the leading measure of fisheries sustainability. The current review began in 2018 and will conclude in 2022.

Stakeholders from all sectors are at the heart of our review, helping identify issues, develop solutions and test proposed changes. We have completed research into the topics identified in the Terms of Reference, and have developed a proposed revised Fisheries Standard. We held a series of consultations throughout 2021 and early 2022 for stakeholders to take part in the development of the Fisheries Standard.

This report details the following for the 2022 consultations on the proposed revised MSC Fisheries Standard:

- Background to topics consulted on
- Participation data
- Next steps in the review process
- Feedback tables

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

ISEAL requires that participation is open to all stakeholders, and that the standard setter proactively seeks contributions from disadvantaged stakeholder groups. This is to ensure that contributors represent a balance of interests in the subject matter and in the geographical scope to which the standard applies. Publishing raw consultation feedback is considered 'aspirational good practice' by ISEAL. We publish this feedback as part of our commitment to transparency in our consultation process.



Background

The Fisheries Standard Review began in 2018 and since then [we have collected and analysed a wealth of information from different sources to help us develop solutions](#). We have conducted our own research, reviewed research carried out by independent scientists, spoken directly with experts, solicited advice from our governance bodies and tested proposed revisions in mock assessments to ensure the proposed changes deliver MSC’s intent, are feasible and can be audited properly.

In this final round of public consultation, stakeholders were invited to take part in an online survey and comment on whether the proposed revisions to [the Standard](#) are effective and can be feasibly applied and audited. Other documents that have proposed revisions as a result of the Fisheries Standard Review are:

- [Draft MSC Fisheries Standard Guidance](#)
- [Draft MSC Fisheries Certification Process](#)
- [Draft Fisheries Certification Process Guidance](#)
- [Draft MSC Fisheries Toolbox](#) (developed as part of the Fisheries Standard Review).

The consultation activities are detailed below.

Online survey

The MSC consulted stakeholders through an [online survey](#) that was open to everyone and available on the MSC website between 1 February – 4 April 2022. Comments were submitted both through the survey and via email during the consultation period. The full feedback from the survey, with individual names and defamatory comments removed, can be found in [Annex XVIII: Feedback tables](#).

Participation overview

This section presents participation data for the consultation activities detailed above.

Table 1: Number of individual respondents representing each stakeholder group.

Stakeholder group	Total
Academic/scientific	10
Commercial wild harvest fisheries	27
Comms/media	1
Conformity assessment and/or accreditation	16
Consumer	2
Governance/management	9
NGO	33
Other	15



Cultural/recreational/artisanal	1
Standard setting	1
Supply chain	37
Unknown	12
Total	164

Table 2: Number of individual respondents representing each geographical region.

Geographical region	Total
Europe	62
North America	44
Latin America	11
Asia	24
Africa	2
Oceania	17
Unknown	4
Total	164

Online survey participation

There were 164 respondents to the online survey. The full list of respondents, their stakeholder groups and country of work can be found in [Table 35](#) in [Annex XVII: Participation](#). A breakdown of stakeholder groups ([Table 1](#)) and geographical regions ([Table 2](#)) can be found above. We also received 29 letter submissions via email from various stakeholders. For those that consented for their submission to be published, the letters can be found in [Annex XIX: Letter responses](#). Five additional submissions were sent to us via email beyond the close of the survey.

We saw a great level of participation in this round of consultation, likely due to this being the final round for stakeholders to provide input on the proposed revised MSC Fisheries Standard and the first time that stakeholders saw the proposal in full. There is broad representation among stakeholder groups with a majority lean towards NGO, commercial wild harvest fisheries, supply chain and conformity assessment and/or accreditation. These stakeholders will likely be the most effected by any changes to the Standard, which may be why we see higher numbers for these categories.

Again we see good representation globally, with a slight lean towards Europe and North America. This may be due to the consultation being held in English. Support was offered for those where English is not a first language. Low participation numbers are seen for stakeholders based in Africa.

Next steps

All feedback from the public review will be analysed and will help us ensure changes are clear and that the new Standard delivers the intentions of our program.

The [MSC Board of Trustees](#) will make the final decision on revising the Standard in June 2022.

There will be a gap of a few months between the Board's decision to approve the Standard and the publication of the new Standard. This will allow for final editorial reviews and to ensure training materials are prepared for Conformity Assessment Bodies and other stakeholders.



Annex I: Changes to the Fisheries Certification Process including those related to the harmonisation of assessments

Overlapping fisheries - those that target the same stocks, operate within the same management frameworks and impact the same habitats and species - should receive consistent scores and conditions of certification. When overlapping fisheries are assessed, they must go through a harmonisation process to make sure scores and conditions have been consistently applied by assessors.

Currently there is ambiguity around how assessors should coordinate the harmonisation process. This has led to uncertainty, recurring harmonisation activities and delays to assessments and surveillance audits.

What has changed?

In the proposed revised Standard we have clarified requirements on the timing, duration and coordination of harmonisation, so that harmonisation should be an annual event. Harmonisation should only be triggered more frequently if new information that would prompt an expedited audit becomes available. The intent of harmonisation remains the same, as does the scope of what should be harmonised.

We have also improved requirements to ensure assessors are clear on the process and have begun the development of a database to help assessors identify overlapping scoring elements across fishery assessments.

As more fisheries join the MSC program, we expect the number of fisheries with overlapping Units of Assessment to increase. These changes will ensure future harmonisation activities are managed more efficiently, avoiding continuous harmonisation cycles.

Participation

This section presents participation data for the 2022 consultation activities on the topic detailed above.

Table 3: Number of individual respondents representing each stakeholder group.

Stakeholder group	Total
Academic/scientific	2
Commercial wild harvest fisheries	6
Comms/media	0
Conformity assessment and/or accreditation	11
Consumer	0
Governance/management	3
NGO	5
Other	1



Cultural/recreational/artisanal	0
Standard setting	1
Supply chain	9
Unknown	2
Total	40

Table 4: Number of individual respondents representing each geographical region.

Geographical region	Total
Europe	13
North America	17
Latin America	1
Asia	1
Africa	0
Oceania	7
Unknown	1
Total	40

Online survey participation

There were 40 respondents to the section of the survey on *changes to the Fisheries Certification Process including those related to the harmonisation of assessments*. The full list of respondents, their stakeholder groups and country of work can be found in [Table 35](#) in [Annex XVII: Participation](#). A breakdown of stakeholder groups ([Table 3](#)) and geographical regions ([Table 4](#)) can be found above.

Annex II: Changes to the scope of the MSC program

Our vision is for the world's oceans to be teeming with life, and seafood supplies safeguarded for this and future generations. The MSC program excludes fisheries and practises which are incompatible this vision or are not in line with our organisational values.

We do not allow fishing that targets marine mammals (such as dolphins and seals), reptiles (such as turtles), birds or amphibians (such as frogs) to be certified. We also exclude fisheries that use explosives or poisons, as these are indiscriminate and not compatible with sustainable fishing. We are proposing to extend these limitations to include fishing practices that deliberately kill or deliberately harass marine mammals.

Currently any vessel that has been involved in a conviction for shark finning in the past two years is ineligible to be part of an MSC certificate. Our standard has been strengthened to make sure shark finning doesn't exist in certified fisheries, including an explicit definition of sharks, as well as rigorous requirements for policies that are effective at preventing shark finning taking place on all vessels.

We also exclude vessels or businesses (entities) convicted of forced and child labour violations. The requirements for all fisheries to report on their forced and child labour mitigation measures will now be set out in a separate Labour Policy Process, to make them more transparent and easier to update as best practice evolves.

Our proposal is to also exclude vessels involved in a conviction for serious maritime crime. Seafood fraud, trafficking and serious cases of illegal, unreported and unregulated fishing are not compatible with certification. It also means the MSC program is directly supporting the implementation of important International Conventions on maritime law.

What has changed?

New scope criteria have been added to our program documents that assessors will have to apply before considering a fishery for certification. This will exclude entities convicted in the past two years of a serious crime, as defined in the UN Convention against Transnational Organised Crime. Our requirements include a list of applicable crimes such as illegal fishing, trafficking and piracy. The exclusion of intentional killing and harassment of mammals is also a new criterion, but exclusion of shark finning vessels already applies to all certified fisheries.

To avoid confusion and duplication, we have moved previous scoring criteria on controversial unilateral exemptions and disputes into basic scoring requirements in Principle 3 of the MSC Fisheries Standard.

The proposed new requirements would exclude fisheries that deliberately set on dolphins in order catch other species or use marine mammals as live fish aggregation devices (FADs). If adopted, any fisheries doing this would have to change their practices in order to become or stay certified. This will affect very few fisheries already in the program.



Participation

This section presents participation data for the 2022 consultation activities on the topic detailed above.

Table 5: Number of individual respondents representing each stakeholder group.

Stakeholder group	Total
Academic/scientific	2
Commercial wild harvest fisheries	11
Comms/media	0
Conformity assessment and/or accreditation	10
Consumer	1
Governance/management	4
NGO	10
Other	7
Cultural/recreational/artisanal	0
Standard setting	1
Supply chain	19
Unknown	10
Total	75

Table 6: Number of individual respondents representing each geographical region.

Geographical region	Total
Europe	34
North America	22
Latin America	5
Asia	3
Africa	0
Oceania	10
Unknown	1
Total	75

Online survey participation

There were 75 respondents to the section of the survey on *changes to the scope of the MSC program*. The full list of respondents, their stakeholder groups and country of work can be found in [Table 35](#) in [Annex XVII: Participation](#). A breakdown of stakeholder groups ([Table 5](#)) and geographical regions ([Table 6](#)) can be found above.

Annex III: Clarifying assessment of dynamic fisheries

The MSC Fisheries Standard requires that dynamic fisheries are managed in a precautionary way, with robust harvest strategies that consider the variability and uncertainty of dynamic fish stocks. Some stocks experience large fluctuations in population size year-on-year, including small pelagic species such as herring. These fluctuations are typically a result of environmental factors including temperature changes or nutrient upwellings in the ocean.

Variability of such stocks means that some fisheries experience changes to their MSC certification throughout the five-year lifespan of a certificate (sometimes called 'yo-yo' certification). The uncertainty of being suspended is a problem for fisheries as it affects the supply chain and ultimately those who will buy their seafood.

What has changed?

The proposed revised Standard includes new guidance with several examples of robust management systems that could be appropriate to large fluctuations in stock size. This includes in-season monitoring that provides real-time data to help managers adapt and respond to changes by closing certain areas to fishing.

New proposed guidance also covers how long-term climate changes should be considered so that fisheries can incorporate 'buffers' into their plans. One such buffer would be managing stocks around a target range for biomass instead of a single point. This would mean suspension from the MSC program is not an immediate risk if the stock population falls.

These additions aim to provide clarity to assessors on how some of these requirements around Harvest Strategies should be interpreted and applied in certain situations. It will mean more robust assessments from CABs to ensure environmentally driven stocks are being managed using a precautionary approach. This will ultimately help ensure that fisheries susceptible to climate change impacts are more resilient to long-term changes.

Participation

This section presents participation data for the 2022 consultation activities on the topic detailed above.

Table 7: Number of individual respondents representing each stakeholder group.

Stakeholder group	Total
Academic/scientific	0
Commercial wild harvest fisheries	2
Comms/media	0
Conformity assessment and/or accreditation	1
Consumer	0
Governance/management	1
NGO	2



Other	0
Cultural/recreational/artisanal	0
Standard setting	1
Supply chain	3
Unknown	2
Total	12

Table 8: Number of individual respondents representing each geographical region.

Geographical region	Total
Europe	2
North America	6
Latin America	0
Asia	0
Africa	0
Oceania	3
Unknown	1
Total	12

Online survey participation

There were 12 respondents to the section of the survey on *clarifying assessment of dynamic fisheries*. The full list of respondents, their stakeholder groups and country of work can be found in [Table 35](#) in [Annex XVII: Participation](#). A breakdown of stakeholder groups ([Table 7](#)) and geographical regions ([Table 8](#)) can be found above.

Annex IV: Clarifying assessment of inseparable and practically inseparable stocks in a catch

Some fisheries catch closely related species that look the same and are impossible to separate. Such species are referred to as inseparable or practicably inseparable (IPI). Our goal is to make sure the MSC Fisheries Standard is clear on how to assess the stocks of these difficult-to-separate species. In the proposed revisions we have aimed to clarify and strengthen guidance to make sure our Standards are being applied consistently and effectively.

What has changed?

We have provided guidance for IPI designation reference periods, similar to the guidance given for major and minor species in Principle 2 of the current version of the Standard. Reference periods refer to the time period for which IPI catch compositions are collected. We also aim to revise the requirements to ensure that species which are not target species for a fishery (defined as ‘out-of-scope’) are not eligible for classification as IPI.

Under the proposed revisions, assessors must now use a five-year average reference period to understand catch composition. By reviewing the previous five years of catch, assessors will be better informed of the average catch composition and whether it encompasses IPI stocks.

Where fisheries do not have the data or species have certain characteristics which make this a difficult timeframe (such as species which do not live for five years), assessors can amend the reference period but must provide a justification for their choice.

We have also proposed the addition of a new eligibility requirement that explicitly states the new combined category of endangered, threatened and protected (ETP) species and out-of-scope species (OOS) cannot be categorised as IPI stocks, to ensure a precautionary approach is being used.

Participation

This section presents participation data for the 2022 consultation activities on the topic detailed above.

Table 9: Number of individual respondents representing each stakeholder group.

Stakeholder group	Total
Academic/scientific	0
Commercial wild harvest fisheries	3
Comms/media	0
Conformity assessment and/or accreditation	3
Consumer	0
Governance/management	0
NGO	3
Other	0

Cultural/recreational/artisanal	0
Standard setting	1
Supply chain	3
Unknown	2
Total	15

Table 10: Number of individual respondents representing each geographical region.

Geographical region	Total
Europe	4
North America	6
Latin America	0
Asia	2
Africa	0
Oceania	2
Unknown	1
Total	15

Online survey participation

There were 15 respondents to the section of the survey on *clarifying assessment of inseparable and practically inseparable stocks in a catch*. The full list of respondents, their stakeholder groups and country of work can be found in [Table 35](#) in [Annex XVII: Participation](#). A breakdown of stakeholder groups ([Table 9](#)) and geographical regions ([Table 10](#)) can be found above.

Annex V: Clarifying assessment of key low trophic level stocks

Depleting the population of species low in the food chain, such as sardines and anchovies, can have significant knock-on effects for other species within the ecosystem. The MSC Fisheries Standard aims to limit the impact on ecosystems caused by the commercial harvesting of such species, known as low trophic level (LTL) species.

Fisheries that target key LTL stocks must ensure they are being managed in a precautionary manner that reflects their ecosystem importance. Fisheries targeting other species at Maximum Sustainable Yield (MSY) level typically ensure that 40% of the unfished population remains in the ocean. However, key LTL species should be managed at a level consistent with the ecosystem needs, which could mean leaving up to 75% of the unfished population in the ocean.

What has changed?

Under the revised Standard, proposed changes include clearer guidance on the requirement for fisheries targeting LTL species. Fisheries must be harvesting at a level consistent with the needs of the ecosystem. The guidance will now be clearer as to what this 'level' should be. This includes stating by default, that the level should not be lower than 75% of the original unfished population, with a rationale required for any alternative.

The revised Standard will also state that the assessors can use either the spawning stock indicator or the total biomass indicator to assess a key LTL stock. However, if the total biomass indicator is used then there must be justification which shows a fishery's management measures protect the key LTL stock and the environment.

Instead of assessors having to re-determine whether a stock is LTL upon each surveillance audit (as is currently the case), any stock designated as LTL would remain as such throughout the certification period. Re-designation can take place during surveillance audits, however, should new information become available.

To facilitate this work, we are currently developing a tool for assessors to help them identify key LTL species more easily.

Participation

This section presents participation data for the 2022 consultation activities on the topic detailed above.

Table 11: Number of individual respondents representing each stakeholder group.

Stakeholder group	Total
Academic/scientific	0
Commercial wild harvest fisheries	2
Comms/media	0
Conformity assessment and/or accreditation	0



Consumer	0
Governance/management	0
NGO	5
Other	0
Cultural/recreational/artisanal	0
Standard setting	1
Supply chain	3
Unknown	2
Total	13

Table 12: Number of individual respondents representing each geographical region.

Geographical region	Total
Europe	2
North America	8
Latin America	0
Asia	0
Africa	0
Oceania	2
Unknown	1
Total	13

Online survey participation

There were 13 respondents to the section of the survey on *clarifying assessment of key low trophic level stocks*. The full list of respondents, their stakeholder groups and country of work can be found in [Table 35](#) in [Annex XVII: Participation](#). A breakdown of stakeholder groups ([Table 11](#)) and geographical regions ([Table 12](#)) can be found above.

Annex VI: Clarifying best practice for reducing impacts on endangered, threatened, and protected species

Most of the MSC Fisheries Standard requirements relating to [endangered, threatened and protected \(ETP\) species](#) were last significantly updated in 2008. Since then, stakeholders had expressed concern that a lack of clear requirement definitions and often limited information on ETP interactions has led to ambiguity in the interpretation of scoring fishery impacts on these species.

Current methods of categorising what constitutes an ETP species had also been raised as a barrier to consistent assessment of fisheries. Stakeholders have noted inconsistencies caused by the use of varying lists of ETP species in the MSC Fisheries Standard v2.01. These lists often vary from country to country, having different criteria and quality of data for their ratings.

We want to ensure sensitive populations are consistently assigned as endangered, threatened or protected so certified fisheries can allow these species to recover and thrive. We also want to incentivise consistent data collection on interactions and mitigation methods used by fisheries. This will help to accurately monitor impacts on ETP species.

We have not changed the intent of our requirements, which direct fisheries to minimise their impact on ETP species and allow recovery. However, we have clarified these requirements to ensure assessments are more accurate and reflect the evolution of best practice in fisheries management.

What has changed?

We have revised our requirements for designating species as ETP to ensure assessors are taking a consistent and precautionary approach, in alignment with the [UN FAO Code of Conduct for Responsible Fisheries](#). Revisions will ensure species are being objectively and accurately classified as ETP, and that more species - including all out-of-scope species - are now subject to the proposed ETP requirements, and thus afforded greater protections under our Standard.

Our proposed revisions include expanding the application of international species lists of CITES, CMS and IUCN to include more species. For example, CITES Appendix 2 species and both CMS Appendix 1 and 2 species have now been added to species lists requiring consideration.

We have also introduced a new two-step process for determining if in-scope species (finfish and invertebrates) should be classified and assessed as ETP:

- **Step 1:** Establish whether the species features on specific international and national lists of ETP species.
- **Step 2:** Apply a set of scientific criteria – stock status, management status or species life history - to reclassify species (with the exception of sharks) as either target catch under Principle 1, or In-Scope species under Principle 2.



This process allows well-managed populations or populations which are inherently resilient to exploitation to be eligible for MSC certification and enables assessors to respond to real-time data on a species and fisheries rather than being fully reliant on listings which may not be up to date.

More explicit consideration of fishery impacts on populations and improved management

We have made it more explicit how assessors should consider whether a fishery is hindering the recovery of an ETP or out-of-scope population during an assessment. We want to ensure assessments are more objective and quantifiable, and so have introduced new definitions and concepts specifying how the impact of a fishery on ETP or out-of-scope population recovery should be measured.

Assessors must now consider whether a fishery is impacting a species' ability to recover to a minimum of '50% of unimpacted levels within three generations or 100 years, whichever is shorter'. This is a type of reference point we refer to as Favourable Conservation Status.

The differing life histories of each species will impact a population's recovery time, and so we will provide assessors with guidance on how to evaluate different species groups. New management requirements will mean fisheries must also explicitly show how they are effectively eliminating or minimising mortality of ETP or out-of-scope species.

We have clarified the language in our requirements on the assessment of indirect impacts and unobserved mortality and provided assessors with additional guidance to ensure our intent is clear. Assessors will now be required to document information related to their assessment of unobserved mortality.

International compliance

We have also introduced new requirements under Principle 3 to ensure assessors are evaluating the fishery's compliance with national and international regulations for protecting ETP species. These changes will deliver more objective and consistent assessments.

Participation

This section presents participation data for the 2022 consultation activities on the topic detailed above.

Table 13: Number of individual respondents representing each stakeholder group.

Stakeholder group	Total
Academic/scientific	6
Commercial wild harvest fisheries	17
Comms/media	1
Conformity assessment and/or accreditation	11
Consumer	1
Governance/management	7
NGO	18
Other	7



Cultural/recreational/artisanal	1
Standard setting	1
Supply chain	22
Unknown	2
Total	94

Table 14: Number of individual respondents representing each geographical region.

Geographical region	Total
Europe	30
North America	30
Latin America	3
Asia	15
Africa	2
Oceania	12
Unknown	2
Total	94

Online survey participation

There were 94 respondents to the section of the survey on *clarifying best practice for reducing impacts on endangered, threatened, and protected species*. The full list of respondents, their stakeholder groups and country of work can be found in [Table 35](#) in [Annex XVII: Participation](#). A breakdown of stakeholder groups ([Table 13](#)) and geographical regions ([Table 14](#)) can be found above.

Annex VII: Clarifying requirements for modified assessment trees

Fisheries wanting to become certified are assessed against the MSC Fisheries Standard using assessment trees, the hierarchy of the principles, components, performance indicators and scoring guideposts. This hierarchy is known as the default assessment tree, which is Annex (now Section) SA in the Fisheries Standard.

Although the old assessment tree worked for most fisheries, it was hard to apply in some cases. This is because of the way some species, including bivalves and salmon, are managed. For example, mussels may initially grow on natural banks before being grown on artificial structures, which were not specified in the default assessment tree.

We want to make sure that the modified assessment trees for enhanced bivalves, salmon and introduced species reflect best practice and continue to meet the MSC intent for sustainable fishing.

What changed?

We reviewed how Annexes (now Sections) SB – SD are implemented and identified areas for clarification. We will incorporate the existing interpretations, which can be found in the [MSC Interpretations Log](#), for salmon and introduced species into the guidance for the Standard. This will address issues which have been noted by both the MSC and stakeholders.

Participation

This section presents participation data for the 2022 consultation activities on the topic detailed above.

Table 15: Number of individual respondents representing each stakeholder group.

Stakeholder group	Total
Academic/scientific	0
Commercial wild harvest fisheries	3
Comms/media	0
Conformity assessment and/or accreditation	2
Consumer	0
Governance/management	0
NGO	3
Other	1
Cultural/recreational/artisanal	0
Standard setting	1
Supply chain	4
Unknown	2
Total	16

Table 16: Number of individual respondents representing each geographical region.

Geographical region	Total
Europe	1
North America	8
Latin America	0
Asia	3
Africa	0
Oceania	3
Unknown	1
Total	16

Online survey participation

There were 16 respondents to the section of the survey on *clarifying requirements for modified assessment trees*. The full list of respondents, their stakeholder groups and country of work can be found in [Table 35](#) in [Annex XVII: Participation](#). A breakdown of stakeholder groups ([Table 15](#)) and geographical regions ([Table 16](#)) can be found above.

Annex VIII: Clarifying the assessment of squid, crab and octopus fisheries

Squid, crab and octopus fisheries are currently under-represented in the MSC program. Increasing engagement of these fisheries could play a key role in ensuring sustainability in some large marine ecosystems.

Species such as crab and cephalopod (squid and octopus) are particularly sensitive to environmental factors and have short life spans, which leads to a large variation in their population size year-on-year, making it difficult to assess stock health. This means these species are not always managed around the maximum sustainable yield (MSY) level. Instead, our current requirements allow proxy methods to be used as alternative reference points to the MSY, which ensures these species are still being targeted at a sustainable level.

We want to make sure the Standard is more accessible to fisheries catching these species, and have developed new guidance that will help to clarify our intent for their assessment. An initial review concluded that the Fisheries Standard is appropriate for the assessment of squid, crab and octopus, and that species-specific assessment trees are not required.

Assessing squid fisheries

The life history of squid can mean that assessment under Principle 1 may be challenging. Squid are not always managed around a maximum sustainable yield (MSY) that is central to the default scoring within the MSC Fisheries Standard. This is primarily due to the variability in the number of squid produced each year that grow to a viable size, and the life-history traits of this species group, rendering such estimates difficult to ascertain.

We have developed additional guidance to aid the assessment of squid, specifically in relation to the use of proxies to demonstrate the stock status of squid is at a level consistent with maximum sustainable yield.

Assessing crab fisheries

As with squid, additional guidance has been recommended for crabs, to protect the reproductive potential of populations targeted by fisheries consisting of male-only harvest.

Assessing octopus fisheries

As with squid and crab species groups, additional guidance has been recommended for octopus to better allow assessment teams to apply the requirements to these species.

Participation

This section presents participation data for the 2022 consultation activities on the topic detailed above.

Table 17: Number of individual respondents representing each stakeholder group.

Stakeholder group	Total
Academic/scientific	0
Commercial wild harvest fisheries	2



Comms/media	0
Conformity assessment and/or accreditation	0
Consumer	0
Governance/management	0
NGO	1
Other	0
Cultural/recreational/artisanal	0
Standard setting	1
Supply chain	3
Unknown	2
Total	9

Table 18: Number of individual respondents representing each geographical region.

Geographical region	Total
Europe	2
North America	5
Latin America	0
Asia	0
Africa	0
Oceania	1
Unknown	1
Total	9

Online survey participation

There were 9 respondents to the section of the survey on clarifying *the assessment of squid, crab and octopus fisheries*. The full list of respondents, their stakeholder groups and country of work can be found in [Table 35](#) in [Annex XVII: Participation](#). A breakdown of stakeholder groups ([Table 17](#)) and geographical regions ([Table 18](#)) can be found above.

Annex IX: Ensuring ecosystem performance indicators are clear and consistently applied

Principle 2 of the MSC Fisheries Standard covers the effect a fishery has on the environment. A key part of this principle is ensuring MSC certified fisheries do not cause irreversible harm to the structure and function of an ecosystem.

We want to ensure the Ecosystem requirements are clear and consistently applied across fisheries assessments. If requirements are unclear, difficult to apply or left open to interpretation, then they could be applied inconsistently.

What has changed?

We are proposing the addition of two new clauses to the Ecosystem component under Principle 2 to clarify and define how ecosystems and key ecosystem elements are identified during an assessment. Assessors will now be required to identify and describe the assessed ecosystem. They will also be required to identify and assess all key ecosystem elements which are impacted by the fishery.

We have also updated our guidance to clarify which ecosystem elements should be considered in an assessment. This will ensure that aspects such as key prey, predators and competitors are clearly identified.

Requiring assessors to explicitly identify the ecosystem and ecosystem elements being assessed will lead to a more targeted approach to evaluating a fishery's impact and will ensure the assessor is only scoring a fishery on ecosystem elements that are likely to be affected.

The revised requirements will not change the bar for ecological performance; however, fisheries may be required to provide different sources of information to demonstrate their impacts on key ecosystem elements. This higher degree of specificity will ensure assessments are robust and consistent, and provide greater transparency in assessment reports, making it easier for stakeholders to understand and contribute to the assessment process.

Participation

This section presents participation data for the 2022 consultation activities on the topic detailed above.

Table 19: Number of individual respondents representing each stakeholder group.

Stakeholder group	Total
Academic/scientific	0
Commercial wild harvest fisheries	4
Comms/media	0
Conformity assessment and/or accreditation	5
Consumer	0
Governance/management	1



NGO	5
Other	0
Cultural/recreational/artisanal	0
Standard setting	1
Supply chain	3
Unknown	2
Total	21

Table 20: Number of individual respondents representing each geographical region.

Geographical region	Total
Europe	3
North America	12
Latin America	0
Asia	0
Africa	1
Oceania	4
Unknown	1
Total	21

Online survey participation

There were 21 respondents to the section of the survey on *ensuring ecosystem performance indicators are clear and consistently applied*. The full list of respondents, their stakeholder groups and country of work can be found in [Table 35](#) in [Annex XVII: Participation](#). A breakdown of stakeholder groups ([Table 19](#)) and geographical regions ([Table 20](#)) can be found above.

Annex X: Ensuring effective fisheries management systems are in place

Principle 3 of the MSC Fisheries Standard relates to systems and policies for [effective fisheries management](#). It states that fisheries must be well governed and have adequate monitoring and enforcement systems in place. The MSC seeks to reward best practice in fisheries management and support fisheries that are working to improve their management systems.

We want to ensure that our requirements for fisheries management continue to align with the latest in global best practice, and that they are clear and consistently applied. Our policy development process has resulted in the following areas being identified for improvement.

[Introduce new evidence requirements on the quality of information needed for scoring fisheries](#)

To be certified as well-managed and sustainable a fishery must have an effective monitoring system in place. This is necessary to provide fishery managers with the information needed to assess fish stocks and manage a fishery's impact on the environment. A strong information base also allows assessors to evaluate a fishery's impacts when it is being assessed for certification. A well-designed monitoring system should collect high quality information on a fishery's activities, such as what it catches, how long it fishes for, where it operates and whether it is compliant with management rules.

What has changed?

We have introduced a new framework that enables assessors to evaluate the quality of information that has been collected by a fishery's monitoring system. This includes the type and extent of information collected on fishing activities, as well as how that information has been reported and provided to the assessment team. This framework will make it easier for assessors to evaluate a fishery's monitoring system in a systematic way, and to report their findings consistently and transparently as part of the certification process.

[Update best practice in the requirements for monitoring, control and surveillance](#)

Principle 3 of the MSC Fisheries Standards requires fisheries to comply with all relevant local, regional and international legislation. We want to ensure that this is assessed rigorously and consistently across all fisheries.

What has changed?

We have clarified scoring issues to make it clearer and simpler for assessors to score fisheries and distinguish between different compliance and enforcement requirements in our standards. This will ensure that fisheries are scored on individual compliance components, rather than being given an all-or-nothing rating that involves aspects of all compliance scoring issues. The existing performance indicator structure would be retained, but the scoring guideposts will be updated so that the definition of current best practice is much clearer in the requirements.

A new scoring issue would also be added for assessing fishers' compliance with management rules. This will mean fisheries are assessed on the extent to which they are compliant separately from the information they provide to demonstrate compliance.



Participation

This section presents participation data for the 2022 consultation activities on the topic detailed above.

Table 21: Number of individual respondents representing each stakeholder group.

Stakeholder group	Total
Academic/scientific	4
Commercial wild harvest fisheries	14
Comms/media	0
Conformity assessment and/or accreditation	6
Consumer	0
Governance/management	5
NGO	12
Other	6
Cultural/recreational/artisanal	0
Standard setting	1
Supply chain	9
Unknown	2
Total	59

Table 22: Number of individual respondents representing each geographical region.

Geographical region	Total
Europe	13
North America	21
Latin America	3
Asia	11
Africa	0
Oceania	10
Unknown	1
Total	59

Online survey participation

There were 59 respondents to the section of the survey on *ensuring effective fisheries management systems are in place*. The full list of respondents, their stakeholder groups and country of work can be found in [Table 35](#) in [Annex XVII: Participation](#). A breakdown of stakeholder groups ([Table 21](#)) and geographical regions ([Table 22](#)) can be found above.

Annex XI: Ensuring habitat performance indicators are clear and consistently applied

The MSC's aim is for MSC certification to protect habitats around the globe, and the impacts a fishery has on habitats is always considered in an MSC assessment.

A fishery cannot be certified if it causes serious damage or irreversible impact on the structure and function of a seafloor habitat. Principle 2 of the MSC Fisheries Standard defines this as damage from which a habitat will take 20 years or longer to recover. For very sensitive types of habitats, also known as Vulnerable Marine Ecosystems (VMEs) any fishery impact should be avoided.

While the previous Fisheries Standard Review considerably strengthened our requirements on habitats, concerns were since raised by stakeholders regarding a lack of clarity and guidance. It was felt that this could be leading to misapplication of the intent and inconsistent assessments. Several questions from stakeholders required us to publish additional guidance for Conformity Assessment Bodies (CABs), referred to as 'Interpretations'.

The MSC's intent for habitats in this review was to understand the nature, scope and extent to which the habitat requirements have been misapplied. From there, the MSC was able to develop a series of options that will clarify the language used in the requirements and guidance.

What has changed?

We have clarified the language used in the Standard requirements and guidance to improve the understanding of the criteria and consistency in how they are applied by assessors. We expect different assessors working for different certification bodies to deliver the same outcomes when they assess the same fishery against our Standard.

A key part of the review was to clarify how habitats are classified according to their sensitivity. Previously, assessors applied the United Nations Food and Agriculture Organisation (FAO) criteria for Vulnerable Marine Ecosystems (VMEs) to all habitats. However, these criteria were designed for deep-sea habitats and were not appropriate to identify VMEs in all areas a fishery may operate in, such as shallow coastal habitats. This may have led to inconsistent assessment outcomes.

We have also clarified our requirements for the precautionary fisheries management systems that must be in place to protect sensitive habitats.

Participation

This section presents participation data for the 2022 consultation activities on the topic detailed above.

Table 23: Number of individual respondents representing each stakeholder group.

Stakeholder group	Total
Academic/scientific	0



Commercial wild harvest fisheries	7
Comms/media	0
Conformity assessment and/or accreditation	6
Consumer	0
Governance/management	0
NGO	5
Other	0
Cultural/recreational/artisanal	0
Standard setting	1
Supply chain	5
Unknown	2
Total	26

Table 24: Number of individual respondents representing each geographical region.

Geographical region	Total
Europe	7
North America	11
Latin America	0
Asia	1
Africa	1
Oceania	5
Unknown	1
Total	26

Online survey participation

There were 26 respondents to the section of the survey on *ensuring the habitat performance indicators are clear and consistently applied*. The full list of respondents, their stakeholder groups and country of work can be found in [Table 35](#) in [Annex XVII: Participation](#). A breakdown of stakeholder groups ([Table 23](#)) and geographical regions ([Table 24](#)) can be found above.

Annex XII: Ensuring the Risk-based Framework continues to deliver precautionary and consistent assessments for data-limited fisheries

The [Risk-Based Framework \(RBF\)](#) review comprises of a detailed review of the RBF and the way it interacts with the Standard; and the creation of the Fisheries Standard Toolbox to house a suite of MSC endorsed tools. The Fisheries Standard Review (FSR) aims to ensure that the RBF is delivering its original intent to act as a precautionary and robust data-limited assessment tool for use in MSC fisheries assessments.

Our Risk-Based Framework (RBF) can be used for different performance indicators across the MSC Fisheries Standard. This includes a precautionary approach to estimating stock status for fisheries that do not have data to assess their impact on target species, and on factors like bycatch and habitats. The RBF can be used in the assessment of fisheries impacts when conventional data, including reference points derived from models such as analytical stock assessments, doesn't exist.

Risk-based approaches are key in the assessment of out-of-scope species (those that cannot be targeted, such as birds and marine mammals) as there is often less data available to determine the impact that fishing has on those populations.

We aim to make sure that all fisheries that are well-managed and sustainable can become certified, even if they do not have all the data usually used by assessors to reach a certification decision.

What has changed?

We have updated our Risk-Based Framework to ensure it delivers precautionary and robust outcomes, and that it is aligned with the Standard's default assessment tree. While the intent of the RBF has not changed, we have identified areas for improvement, such as the assessment of out-of-scope species.

We have also increased accessibility of the Fisheries Standard through the potential inclusion of further risk-based approaches and assessment tools to facilitate data-limited assessments in the future.

Participation

This section presents participation data for the 2022 consultation activities on the topic detailed above.

Table 25: Number of individual respondents representing each stakeholder group.

Stakeholder group	Total
Academic/scientific	1
Commercial wild harvest fisheries	4



Comms/media	0
Conformity assessment and/or accreditation	6
Consumer	0
Governance/management	1
NGO	3
Other	0
Cultural/recreational/artisanal	0
Standard setting	1
Supply chain	5
Unknown	2
Total	23

Table 26: Number of individual respondents representing each geographical region.

Geographical region	Total
Europe	5
North America	12
Latin America	0
Asia	0
Africa	0
Oceania	5
Unknown	1
Total	23

Online survey participation

There were 23 respondents to the section of the survey on *ensuring the Risk-based Framework continues to deliver precautionary and consistent assessments for data-limited fisheries*. The full list of respondents, their stakeholder groups and country of work can be found in [Table 35](#) in [Annex XVII: Participation](#). A breakdown of stakeholder groups ([Table 25](#)) and geographical regions ([Table 26](#)) can be found above.

Annex XIII: Identifying further solutions to ensure MSC certified fisheries are not involved in shark finning

The MSC Fisheries Standard requires certification bodies to assess the likelihood that any vessel in a fishery is engaged in shark finning. This is part of the scoring for both Principle 1 (sustainable stocks) and Principle 2 (minimising environmental impact).

Shark finning is the cruel practice of removing any of the fins of a shark (including the tail) and discarding the remainder of the shark at sea. Shark finning is a wasteful and abhorrent practice that is strictly prohibited within MSC certified fisheries.

Our recent updating of the MSC Fisheries Certification Process v2.2 clarified the MSC Board's intent that shark finning is not to be undertaken within MSC certified fisheries. But there are still concerns that the current requirements do not reflect global best practice or lead to consistent outcomes.

Under our current Standard, a Fins Naturally Attached policy is an option for scoring at the best practice level (SG80) and above, but it is not mandatory. Fisheries without such a policy can also achieve certification by demonstrating improvements in management measures, such as increasing levels of external validation.

This review considered whether our current shark finning requirements deliver the needed confidence that shark finning is not occurring in an MSC certified fishery.

What has changed?

[Fins Naturally Attached is the only acceptable policy](#)

Under the proposed revised Standard, a Fins Naturally Attached (FNA) policy will be mandatory for fisheries that retain sharks. This policy will be required for fisheries to achieve the minimum acceptable score (SG60) for certification, with SG60 the only level under which shark finning will be scored.

[Stronger evidence requirements to verify policies are working](#)

Our proposed new [evidence requirements framework](#) will provide greater confidence that a FNA policy is being applied, by requiring assessors to consider the quality of the evidence used to confirm its implementation. For instance, assessors need to look for evidence that a fishery is monitoring its interactions with sharks to ensure that breaches of an FNA policy would be detected. This could involve on-board monitoring systems, inspections by enforcement officers or other methods.

The evidence requirements framework will also be applied in cases where fisheries operate under non-retention policies (where management requires that sharks are released whole if captured). In such cases, assessors will also be applying the new evidence requirement framework, to ensure that non-retention policies are being properly implemented.

By ensuring fisheries that retain sharks have an FNA policy - and having the evidence requirements assess the quality of information for any fishery that capture sharks, whether



retained or released - the proposed changes will make certain that shark finning does not take place within MSC certified fisheries.

Bespoke shark definition scored under 'shark finning'

There is no globally accepted definition for 'shark' and the lack of a definition in our current version of our Standard has led to inconsistencies in the way different species are considered in the shark finning requirements. To resolve this, we have proposed a new default definition of a shark in our Standard requirements, with respect to shark finning. The new Standard requirements define sharks as selachimorpha (true sharks) and rhinopristiformes (e.g. shovel nose rays, guitar fishes). This covers all the [species most vulnerable to the shark fin trade](#) and exceeds the legal requirements of many jurisdictions where the term 'shark' is applied. However, if a fishery operates within a jurisdiction which defines additional species as sharks, then the assessor must consider those species too.

Making sure ETP species of sharks are not being finned

Shark finning will still be assessed under both Principle 1 and Principle 2 of the Fisheries Standard, as well as being in our scope criteria. Under the new requirements proposed, shark finning will now also be scored within the Endangered, Threatened and Protected (ETP) species requirements in Principle 2.

Under the MSC's current Standard, there is no explicit scoring of shark finning as part of our Endangered, Threatened and Protected (ETP) species requirements. This is because the assumption was that because the species were ETP, they would not be retained but they would be released whole into the water. Under our new requirements, fisheries that capture sharks listed as ETP will now have to explicitly assess that shark finning is not taking place.

Participation

This section presents participation data for the 2022 consultation activities on the topic detailed above.

Table 27: Number of individual respondents representing each stakeholder group.

Stakeholder group	Total
Academic/scientific	2
Commercial wild harvest fisheries	6
Comms/media	0
Conformity assessment and/or accreditation	9
Consumer	1
Governance/management	1
NGO	18
Other	3
Cultural/recreational/artisanal	0
Standard setting	1
Supply chain	12
Unknown	2

Total	55
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Table 28: Number of individual respondents representing each geographical region.

Geographical region	Total
Europe	20
North America	18
Latin America	0
Asia	9
Africa	1
Oceania	6
Unknown	1
Total	56

Online survey participation

There were 55 respondents to the section of the survey on *identifying further solutions to ensure MSC certified fisheries are not involved in shark finning*. The full list of respondents, their stakeholder groups and country of work can be found in [Table 35](#) in [Annex XVII: Participation](#). A breakdown of stakeholder groups ([Table 27](#)) and geographical regions ([Table 28](#)) can be found above.

Annex XIV: Making the MSC Fisheries Standard more efficient

The MSC Fisheries Standard has a complex structure and scoring system. There is a risk that this complexity may cause inconsistent application of the Standard, lead to lengthy and costly assessments, and decrease the transparency of assessments. The objective is to identify and resolve complexities and inefficiencies in the structure of the Fisheries Standard and scoring system. Our goal is to provide a simpler standard, which can be more readily understood by stakeholders and be reliably and consistently applied by assessors.

Principle 2 is identified and prioritised as the principle with the highest level of complexity by CABs and assessors. The scope for this review was:

- To clarify Language and reduce duplication (merged with editorial review)
- Better define “Measures”, “Partial Strategy” and “Strategy”.
- Simplify Grouping of P2 elements

We have aimed to simplify our Standard and make sure language is clear and easily understood by all stakeholders. We have reduced redundancy in the Standard and reduced duplication in Principle 2 performance indicators. This means our Standard can be applied more efficiently. It will help to reduce the barriers for new fisheries seeking certification and help certified fisheries stay in the program more easily.

What has changed?

Clarifying language and reducing duplication

In the proposed revised Standard, we have clarified the language used in Principle 2 and removed duplication within its Performance Indicators. This includes ensuring that scoring issues only address one question at each scoring guidepost, and the removal of redundant and ambiguous language. As a result, we have removed 15 scoring issues across Principle 2.

We have also minimised cross-referencing to definitions and guidance by both clarifying language and providing links to our guidance documents.

Clarification of definitions

To make sure assessments are more accurate and efficient, we will clarify the definitions of the following management terms used within Principle 2 of our Standard:

- ‘Measures’
- ‘Partial Strategy’
- ‘Strategy’

The meaning and intent of these terms will not change, however we will provide a table of definitions that consolidates current requirements and guidance on the scale and scope of these terms. This will make it easier for fisheries and assessors to understand the meaning of each term, and the differences between them.



Simplify groupings of Principle 2 species

To complement proposed new requirements for endangered, threatened or protected species and out of scope species, the assessment of all other fish and invertebrates not targeted by the fishery will now be assessed under a single component, called In-scope species.

Currently, species that are scored under Principle 2 of our Standard are grouped into several categories including ‘main’ and ‘minor’, and ‘managed’ and ‘unmanaged’. However, these categories are not commonly used to categorise species outside of the MSC, which can lead to confusion for stakeholders and adds complexity for assessors.

Impact of proposed revisions

The proposed changes will enable Conformity Assessment Bodies to carry out assessments more efficiently and lead to more consistent outcomes. The intent of the Standard will not change.

Simplifying the language used and removing ambiguous terms will also support stakeholders in developing a better understanding of the Standard. This will make it clearer for fisheries to know how to meet the Standard and make improvements if conditions of certification are set. It will also make it easier for stakeholders, such as NGOs, to contribute to a fishery assessment.

Participation

This section presents participation data for the 2022 consultation activities on the topic detailed above.

Table 29: Number of individual respondents representing each stakeholder group.

Stakeholder group	Total
Academic/scientific	0
Commercial wild harvest fisheries	6
Comms/media	0
Conformity assessment and/or accreditation	7
Consumer	0
Governance/management	1
NGO	6
Other	1
Cultural/recreational/artisanal	0
Standard setting	1
Supply chain	14
Unknown	10
Total	46

Table 30: Number of individual respondents representing each geographical region.

Geographical region	Total
Europe	21
North America	16
Latin America	0
Asia	3
Africa	0
Oceania	5
Unknown	1
Total	46

Online survey participation

There were 46 respondents to the section of the survey on *making the MSC Fisheries Standard more efficient*. The full list of respondents, their stakeholder groups and country of work can be found in [Table 35](#) in [Annex XVII: Participation](#). A breakdown of stakeholder groups ([Table 29](#)) and geographical regions ([Table 30](#)) can be found above.

Annex XV: Reviewing Principle 1 with a focus on harvest strategies

To meet the requirements of Principle 1 of the MSC Fisheries Standard, sustainable fisheries should have a robust and precautionary harvest strategy in place. A harvest strategy is the combination of monitoring, stock assessment, harvest control rules and management actions that are required to bring about the sustainable management of the fishery.

However, for certain stocks, such as those managed by regional fisheries management organisations (RFMOs), the development and implementation of harvest strategies is particularly challenging.

We have reviewed our Principle 1 requirements to identify these challenges and respond to advances in science or global best practice.

Challenges of implementing harvest strategies

Fisheries management authorities responsible for managing multi-jurisdictional fisheries have started developing and implementing effective harvest strategies to manage the resources under their mandate. However, progress is slow.

Not addressing long term objectives in an appropriate timeframe may end up having a negative impact on the sustainable use of the stocks. There is a need for those responsible to focus on long-term sustainability, to follow best practice and guarantee stocks are managed at an appropriate productivity level with robust management measures.

Specific to MSC certified fisheries, some regional fisheries management organisations (RFMOs) are not developing and implementing effective harvest strategies for all stocks they are responsible for within one certification cycle. Such a situation limits or prevent fishery clients from closing conditions related to harvest strategies and/or harvest control rules. The imposition and closure of conditions is a central component of [our Theory of Change](#).

This review could change the intent of the [MSC Fisheries Standard](#), through the development of new requirements under Principle 1.

What has changed?

Component 1: Clarifying existing requirements for the assessment of harvest strategies

We are proposing the addition of definitions for both 'responsive' harvest strategy and 'designed' harvest strategy to the Fisheries Standard requirements. This will help ensure fisheries are scored consistently.

A responsive harvest strategy would be defined as a strategy that allows stock management to adapt to the development and implementation of other elements in the strategy such as harvest control rules and to demonstrate that positive action has been taken by management when required.

A designed harvest strategy includes a management procedure which has been developed through management strategy evaluation. This uses a computer simulation, allowing various scenarios and impacts of management procedures to be tested. It uses algorithm-based rules to simulate outcomes and is the most robust way to implement a harvest strategy.



Component 2: Addressing issues fisheries may face in resolving conditions of certification related to harvest strategies

We are focussing on developing requirements that incentivise the adoption of harvest strategies for stocks managed by RFMOs. We are proposing the introduction of a phased condition pathway to support these fisheries in resolving conditions of certification within Principle 1 of the Standard.

It is proposed that this phased condition pathway will be assessed through a bespoke scoring tree and would be compulsory for fisheries targeting stocks that are managed under RFMOs. Scoring will remain the same, but it will require that fisheries that target RFMO managed stocks, develop state-of-the-art harvest strategies while allowing additional time for development and implementation. Any fishery can also voluntarily apply these requirements.

The scoring will remain almost identical to the default assessment tree with a difference that 'available' harvest control rules (HCRs) at SG60 will only be scored in the annex. 'Available' HCRs can only be applied when the target stock is healthy and can either be another HCR implemented by the Principle 1 management agency on a separate stock or a clear workplan for the development of a HCR on the target stock. 'Available' HCRs were permitted in the default tree in the previous requirements.

The length of time given to resolve Principle 1 conditions for harvest strategies and harvest control rules is dependent on the previous certification history of the Principle 1 target stock (see below). The target stock here, refers to the stock assessed within the Principle 1 Unit of Assessment (UoA), for example, yellowfin tuna in the Western Central Pacific Ocean.

Fisheries with a target stock entering the program for the first time (e.g., the stock has not been part of a previous certification) will be given a maximum of ten years – or two certification cycles – to develop and adopt a state-of-the-art harvest strategy.

Fisheries with a target stock that have only had one previous certification will be given a maximum of five additional years (or one certification cycle) to resolve conditions, provided they meet the entry criteria – namely, that the first three steps of Phase 1 (see below) are completed prior to entering re-assessment.

Fisheries with a target stock that have had more than one previous certification, will have a maximum of two additional years to meet their conditions, provided they meet several entry criteria.

The pathway to state-of-the-art harvest strategies

Fisheries would be set pre-defined milestones over two phases, with progress audited by an independent conformity assessment body (CAB). These phases focus on two distinct processes: the science phase and the policy phase. A considerable amount of collaboration will be needed between scientists and policy makers throughout this process, in order to deliver state-of-the-art harvest strategies.

Phase 1: Science focus

Fisheries must demonstrate they are developing a harvest strategy and have completed a management strategy evaluation (MSE). Harvest strategies developed through MSE are more robust to uncertainty and allow the testing and definition of specific management objectives.



1. Management objectives related to the development of the harvest strategy, performance indicators and data defined.
2. Operating models and potential management procedures (MPs) that include mechanisms to reducing fishing pressure on the stock and is impact tested through MSE simulations.
3. Demonstration of consultation and input from stakeholders.
4. Preferred harvest strategy(s) adhering to a management procedures (MP)s approach with an agreed catch constraint identified, such as a total allowable catch (TAC) or closure period.

Phase 2: Policy focus

The second phase will focus on implementing the new harvest strategy policy. A key step will be to ensure fisheries managers agree to and adopt the strategy proposed and put in place mechanisms to manage catches accordingly.

1. Mechanism for catch constraints agreed.
2. Harvest strategy adhering to management procedures (MP) approach with catch constraints or resource sharing mechanism that follows scientific advice, adopted and implemented.
3. A schedule plan agreed that periodically reviews the effectiveness of the harvest strategy.

Participation

This section presents participation data for the 2022 consultation activities on the topic detailed above.

Table 31: Number of individual respondents representing each stakeholder group.

Stakeholder group	Total
Academic/scientific	3
Commercial wild harvest fisheries	14
Comms/media	0
Conformity assessment and/or accreditation	6
Consumer	0
Governance/management	3
NGO	9
Other	2
Cultural/recreational/artisanal	0
Standard setting	1
Supply chain	9
Unknown	3

Total	50
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Table 32: Number of individual respondents representing each geographical region.

Geographical region	Total
Europe	8
North America	19
Latin America	3
Asia	9
Africa	0
Oceania	9
Unknown	2
Total	50

Online survey participation

There were 50 respondents to the section of the survey on *reviewing Principle 1 with a focus on harvest strategies*. The full list of respondents, their stakeholder groups and country of work can be found in [Table 35](#) in [Annex XVII: Participation](#). A breakdown of stakeholder groups ([Table 31](#)) and geographical regions ([Table 32](#)) can be found above.

Annex XVI: Supporting the prevention of gear loss and ghost fishing

Our Fisheries Standard previously included criteria for assessing how fisheries are [preventing ghost fishing](#). These criteria assessed ghost gear impacts indirectly. But best practice has evolved substantially in the past decade with regard to managing the impact of ghost gear - fishing gear that has been abandoned, lost or discarded in the ocean.

Some of these advances include the development of new gear designs, new routes for safe disposal of fishing gear and [new requirements from bodies such as the UN FAO on how gear should be marked and tagged to prevent loss](#). There have also been several examples of best practice guidelines produced by groups such as the Global Ghost Gear Initiative and the International Seafood Sustainability Foundation.

In the revised Standard we have aligned our requirements with the latest best practice, to ensure Conformity Assessment Bodies (CABs) are assessing the impact on marine life consistently and correctly.

Concerns were raised by both the MSC and stakeholders that the implicit way previous criteria handled this issue does not encourage fisheries to adopt effective strategies to prevent gear loss and ghost fishing. It could also lead to inconsistent assessment outcomes. We have codified all the examples above into new guidance supporting the application of these requirements.

Many fisheries are already working to minimise gear loss, and to align with evolving best practice on issues like the entanglement of marine mammals and turtles in fishing gear. Fishing gear is expensive and hard to replace or repair, so most fishers manage it carefully. But to ensure this is happening consistently across all MSC certified fisheries, we have introduced these new requirements on gear loss and produced guidance on what we consider acceptable and best practice.

What has changed?

We have proposed revisions to our requirements under Principle 1 of the Standard (sustainability of stocks) to make the consideration of ghost gear impact more explicit.

We have also proposed a new requirement to the Principle 2 components for Endangered, Threatened and Protected species (ETP) and Habitats which will direct fisheries to implement management strategies focused on minimising gear loss (including lost or discarded Fish Aggregation Devices) and ghost gear impact. Any fishery that has no associated ETP species will be scored on its impact on “In scope” species instead, so that ghost fishing is always considered in any assessment.

Additionally, we produced extensive guidance on what we consider minimum acceptable practice on avoiding gear loss (and reducing ghost gear impact) necessary to pass an assessment, as well as the best practice measures that fisheries need to achieve to be certified without conditions.



Although mitigation of gear loss and ghost gear impacts are already in our standards, these changes mean fisheries would have to consider them more fully and implement effective strategies to avoid gear loss and its impact.

Participation

This section presents participation data for the 2022 consultation activities on the topic detailed above.

Table 33: Number of individual respondents representing each stakeholder group.

Stakeholder group	Total
Academic/scientific	5
Commercial wild harvest fisheries	13
Comms/media	0
Conformity assessment and/or accreditation	8
Consumer	1
Governance/management	3
NGO	9
Other	7
Cultural/recreational/artisanal	0
Standard setting	1
Supply chain	18
Unknown	10
Total	75

Table 34: Number of individual respondents representing each geographical region.

Geographical region	Total
Europe	33
North America	18
Latin America	1
Asia	13
Africa	1
Oceania	7
Unknown	2
Total	75

Online survey participation

There were 75 respondents to the section of the survey on *supporting the prevention of gear loss and ghost fishing*. The full list of respondents, their stakeholder groups and country of work can be found in [Table 35](#) in [Annex XVII: Participation](#). A breakdown of stakeholder groups ([Table 33](#)) and geographical regions ([Table 34](#)) can be found above.



Annex XVII: Participation

Table 35: Full list of respondents to the online survey. For those respondents who consented to this, their names and organisations are included.

Name	Organisation	Stakeholder group	Country
Redacted at request of individual	Redacted at requested of individual	Academic/Scientific	Canada
Redacted at request of individual	Redacted at requested of individual	Academic/Scientific	France
Redacted at request of individual	Redacted at requested of individual	Academic/Scientific	France
Redacted at request of individual	Redacted at requested of individual	Academic/Scientific	Germany
Redacted at request of individual	Redacted at requested of individual	Academic/Scientific	Germany
Redacted at request of individual	Redacted at requested of individual	Academic/Scientific	India
Redacted at request of individual	Redacted at requested of individual	Academic/Scientific	India
Gakushi Ishimura	Unknown	Academic/Scientific	Japan
Redacted at request of individual	Redacted at requested of individual	Academic/Scientific	Japan
Redacted at request of individual	Redacted at requested of individual	Academic/Scientific	Japan
Redacted at request of individual	Redacted at requested of individual	Academic/Scientific	Japan
Michel J Dreyfus Leon	FIDEMAR (national fishery observer program)	Academic/Scientific	Mexico
Victor Vargas Lopez	Independent	Academic/Scientific	Mexico
Professor Emeritus Elisabeth Slooten	Unknown	Academic/Scientific	New Zealand
Steve Cadrin	University of Massachusetts	Academic/Scientific	USA
Annie Jarrett	NPF Industry Pty Ltd	Commercial wild harvest fisheries	Australia
Brian Jeffriess	Australian Southern Bluefin Tuna (SBT) Industry Association Ltd (ASBTIA)	Commercial wild harvest fisheries	Australia
Kelly Pyke-Tape	Spencer Gulf & West Coast Prawn Fishermen's Association	Commercial wild harvest fisheries	Australia
Redacted at request of individual	Redacted at requested of individual	Commercial wild harvest fisheries	Australia
Redacted at request of	Redacted at requested of	Commercial wild harvest	Australia

individual	individual	fisheries	
Redacted at request of individual	Redacted at requested of individual	Commercial wild harvest fisheries	Australia
Redacted at request of individual	Redacted at requested of individual	Commercial wild harvest fisheries	Australia
Redacted at request of individual	Redacted at requested of individual	Commercial wild harvest fisheries	Australia
Chris Sporer	Pacific Halibut Management Association of BC (PHMA)	Commercial wild harvest fisheries	Canada
Redacted at request of individual	Redacted at requested of individual	Commercial wild harvest fisheries	Canada
Hector Tellez Alvarado	Industrial Fishing and Ship Owners Association IV Region, Chile (AIP)	Commercial wild harvest fisheries	Chile
Redacted at request of individual	Redacted at requested of individual	Commercial wild harvest fisheries	France
Redacted at request of individual	Redacted at requested of individual	Commercial wild harvest fisheries	Germany
Hiroshi Izumisawa	Izumisawa-Suisan Co.Ltd.	Commercial wild harvest fisheries	Japan
Ichiro Suzuki	Kesennuma Pelagic Fisheries Cooperative	Commercial wild harvest fisheries	Japan
Makoto Suzuki	Japan Fisheries Certification Support	Commercial wild harvest fisheries	Japan
Nagatoshi Sasaki	Kesennuma Area Inshore Tuna Fisheries Cooperative	Commercial wild harvest fisheries	Japan
Sotarou Usui	Usufuku Honten Co., Ltd.	Commercial wild harvest fisheries	Japan
Tetsuo Saito	Kesennuma Fisheries Cooperative and Miyagi Prefecture Tuna Fisheries Cooperative	Commercial wild harvest fisheries	Japan
Redacted at request of individual	Redacted at requested of individual	Commercial wild harvest fisheries	Japan
Redacted at request of individual	Redacted at requested of individual	Commercial wild harvest fisheries	Japan
Benito Sarmiento	Baja Aqua Farms	Commercial wild harvest fisheries	Mexico
Redacted at request of individual	Redacted at requested of individual	Commercial wild harvest fisheries	Mexico
Redacted at request of individual	Redacted at requested of individual	Commercial wild harvest fisheries	Mexico
Redacted at request of individual	Redacted at requested of individual	Commercial wild harvest fisheries	Philippines
Redacted at request of	Redacted at requested of	Commercial wild harvest	Spain

individual	individual	fisheries	
Redacted at request of individual	Redacted at requested of individual	Commercial wild harvest fisheries	Spain
Eric Kingma	Hawaii Longline Association	Commercial wild harvest fisheries	USA
John F. Whiteside	Sustainable Fisheries Association, Inc.	Commercial wild harvest fisheries	USA
Mark Fina	Alaska Seafood Cooperative	Commercial wild harvest fisheries	USA
Matt Tinning	At-sea Processors Association	Commercial wild harvest fisheries	USA
Nicola Mckean-Wood	Fishing	Commercial wild harvest fisheries	USA
Redacted at request of individual	Redacted at requested of individual	Commercial wild harvest fisheries	USA
Redacted at request of individual	Redacted at requested of individual	Commercial wild harvest fisheries	USA
Redacted at request of individual	Redacted at requested of individual	Commercial wild harvest fisheries	USA
Redacted at request of individual	Redacted at requested of individual	Commercial wild harvest fisheries	USA
Redacted at request of individual	Redacted at requested of individual	Commercial wild harvest fisheries	USA
Redacted at request of individual	Redacted at requested of individual	Comms/media	Germany
Redacted at request of individual	Redacted at requested of individual	Comms/media	Japan
Alexander Morison	Unknown	Conformity assessment and/or accreditation	Australia
Richard Banks	Independent Assessor and Team Leader	Conformity assessment and/or accreditation	Australia
Sascha Brand-Gardner	bio.inspecta/q.inspecta	Conformity assessment and/or accreditation	Australia
Redacted at request of individual	Redacted at requested of individual	Conformity assessment and/or accreditation	Belgium
Redacted at request of individual	Redacted at requested of individual	Conformity assessment and/or accreditation	Canada
Redacted at request of individual	Redacted at requested of individual	Conformity assessment and/or accreditation	France
Redacted at request of individual	Redacted at requested of individual	Conformity assessment and/or accreditation	Ireland
Yoko Tamura	Ocean Conscious Consulting	Conformity assessment and/or accreditation	Japan
Redacted at request of individual	Redacted at requested of individual	Conformity assessment and/or accreditation	Japan
Redacted at request of	Redacted at requested of	Conformity assessment	Mexico

individual	individual	and/or accreditation	
Stewart Norman	Capricorn Marine Environmental	Conformity assessment and/or accreditation	South Africa
Lucia Revenga	DNV	Conformity assessment and/or accreditation	Spain
Fisheries	CU UK	Conformity assessment and/or accreditation	UK
Gudrun Gaudian	none	Conformity assessment and/or accreditation	UK
Ylva Longva	LRQA	Conformity assessment and/or accreditation	UK
Redacted at request of individual	Redacted at requested of individual	Conformity assessment and/or accreditation	UK
Redacted at request of individual	Redacted at requested of individual	Conformity assessment and/or accreditation	UK
Redacted at request of individual	Redacted at requested of individual	Conformity assessment and/or accreditation	UK
Redacted at request of individual	Redacted at requested of individual	Conformity assessment and/or accreditation	UK
Amanda Stern-Pirlot	MRAG Americas	Conformity assessment and/or accreditation	USA
Jodi Bostrom	DNV	Conformity assessment and/or accreditation	USA
Christian Sahlmann	Unknown	Consumer	Germany
Jochen Schmidt-Rudloff	no organisation	Consumer	Germany
Lori Cunningham	Myself	Cultural/recreational/artisanal	USA
Kim Walshe	Dept of Primary Industries and Regional Development	Governance/management	Australia
William Kenneth Rodman	former DFO	Governance/management	Canada
Redacted at request of individual	Redacted at requested of individual	Governance/management	Canada
Redacted at request of individual	Redacted at requested of individual	Governance/management	Germany
Redacted at request of individual	Redacted at requested of individual	Governance/management	Germany
Redacted at request of individual	Redacted at requested of individual	Governance/management	Japan
Maurice	PNA	Governance/management	Marshall Islands
National Commission For Aquaculture And Fisheries	National Commission for Aquaculture and Fisheries	Governance/management	Mexico
Redacted at request of individual	Redacted at requested of individual	Governance/management	Spain

Daniel McKiernan	Massachusetts Division of Marine Fisheries	Governance/management	USA
Jason Thomas Didden	Mid-Atlantic Fishery Management Council (MAFMC)	Governance/management	USA
Redacted at request of individual	Redacted at requested of individual	Governance/management	USA
Alexia Wellbelove	Humane Society International Australia	Non-governmental organisation	Australia
Dr Leonardo Guida	Australian Marine Conservation Society	Non-governmental organisation	Australia
Cornelia Nauen	Mundus maris asbl	Non-governmental organisation	Belgium
Steve Devitt	Atlantic Groundfish Council	Non-governmental organisation	Canada
Redacted at request of individual	Redacted at requested of individual	Non-governmental organisation	Canada
Redacted at request of individual	Redacted at requested of individual	Non-governmental organisation	Canada
Jane Chen	MSC	Non-governmental organisation	China
Redacted at request of individual	Redacted at requested of individual	Non-governmental organisation	France
Redacted at request of individual	Redacted at requested of individual	Non-governmental organisation	France
Ulrich Karlowski	Deutsche Stiftung Meeresschutz	Non-governmental organisation	Germany
Redacted at request of individual	Redacted at requested of individual	Non-governmental organisation	Germany
Redacted at request of individual	Redacted at requested of individual	Non-governmental organisation	India
Redacted at request of individual	Redacted at requested of individual	Non-governmental organisation	Japan
Marco Polo Barajas	Comunidad y Biodiversidad AC (COBI)	Non-governmental organisation	Mexico
Raziel Hernandez P	Comunidad y Biodiversidad AC	Non-governmental organisation	Mexico
Redacted at request of individual	Redacted at requested of individual	Non-governmental organisation	Mexico
Redacted at request of individual	Redacted at requested of individual	Non-governmental organisation	Mexico
Redacted at request of individual	Redacted at requested of individual	Non-governmental organisation	Singapore
Jennifer Olbers	Wildlands Conservation Trust	Non-governmental organisation	South Africa

Dr. Iris Ziegler	Sharkproject International	Non-governmental organisation	Switzerland
Redacted at request of individual	Redacted at requested of individual	Non-governmental organisation	Switzerland
Ali Hood	Shark Trust	Non-governmental organisation	UK
Rory Crawford	BirdLife International	Non-governmental organisation	UK
Sarah Dolman	Whale & Dolphin Conservation	Non-governmental organisation	UK
Tom Pickerell	Global Tuna Alliance	Non-governmental organisation	UK
Redacted at request of individual	Redacted at requested of individual	Non-governmental organisation	UK
Grantly Galland	The Pew Charitable Trusts	Non-governmental organisation	USA
Jennifer Humberstone	The Nature Conservancy	Non-governmental organisation	USA
John Pappalardo	Cape Cod Commercial Fishermen's Alliance Inc	Non-governmental organisation	USA
Kevin Fitzsimmons	F3 Future of Fish Feed	Non-governmental organisation	USA
Michelle Cho	Anderson Cabot Center for Ocean Life at the New England Aquarium	Non-governmental organisation	USA
Shana Miller	The Ocean Foundation	Non-governmental organisation	USA
Sonja Fordham	Shark Advocates International	Non-governmental organisation	USA
Susan Jackson	International Seafood Sustainability Foundation (ISSF)	Non-governmental organisation	USA
Susan Millward	Animal Welfare Institute	Non-governmental organisation	USA
Redacted at request of individual	Redacted at requested of individual	Non-governmental organisation	USA
Redacted at request of individual	Redacted at requested of individual	Non-governmental organisation	USA
Redacted at request of individual	Redacted at requested of individual	Non-governmental organisation	USA
Rasmus Hedeholm	Sustainable Fisheries Greenland (SFG)	Other	Denmark
Redacted at request of individual	Redacted at requested of individual	Other	India
Aiko Yamauchi	Seafood Legacy	Other	Japan
Makoto Suzuki	Japan Fisheries	Other	Japan

	Certification Support		
Redacted at request of individual	Redacted at requested of individual	Other	Japan
Mariana Ramos Sanchez	PACIFIC ALLIANCE FOR SUSTAINABLE TUNA	Other	Mexico
Redacted at request of individual	Redacted at requested of individual	Other	Mexico
Aaron Irving	Deepwater Group	Other	New Zealand
Redacted at request of individual	Redacted at requested of individual	Other	Philippines
Graham John Pierce	Instituto de Investigaciones Marinas (CSIC)	Other	Spain
Amy Hammond	Unknown	Other	UK
Christopher Robin Evans	Unknown	Other	UK
Dr Clive Fox	Scottish Association for Marine Science	Other	UK
Redacted at request of individual	Redacted at requested of individual	Other	UK
Guillermo Gomez	Gomez-Hall Associates	Other	USA
Natalia Novikova	ForSea Solutions LLC (https://www.forseasolutions.com/)	Other	USA
Redacted at request of individual	Redacted at requested of individual	Other	USA
Redacted at request of individual	Redacted at requested of individual	Other	USA
Redacted at request of individual	Redacted at requested of individual	Other	USA
Redacted at request of individual	Redacted at requested of individual	Seafood supply	Germany
Redacted at request of individual	Redacted at requested of individual	Seafood supply chain	Australia
Redacted at request of individual	Redacted at requested of individual	Seafood supply chain	Australia
Redacted at request of individual	Redacted at requested of individual	Seafood supply chain	Belgium
Redacted at request of individual	Redacted at requested of individual	Seafood supply chain	Canada
Varovic, Denis	CROFISH, obrt za trgovinu i prijevoz	Seafood supply chain	Croatia
Redacted at request of individual	Redacted at requested of individual	Seafood supply chain	France
Redacted at request of individual	Redacted at requested of individual	Seafood supply chain	France

Redacted at request of individual	Redacted at requested of individual	Seafood supply chain	France
Redacted at request of individual	Redacted at requested of individual	Seafood supply chain	France
Redacted at request of individual	Redacted at requested of individual	Seafood supply chain	France
Dr. Matthias Keller	Bundesverband der deutschen Fischindustrie und des Fischgroßhandels e.V.	Seafood supply chain	Germany
Frederick Fiedler	H.-J. Fiedler Meeresdelikatessen GmbH	Seafood supply chain	Germany
Juergen Pauly	Globus Markthallen Holding GmbH & Co. KG	Seafood supply chain	Germany
Jürgen Lenzner	Rullko	Seafood supply chain	Germany
Sandelmann GmbH	Producer	Seafood supply chain	Germany
Redacted at request of individual	Redacted at requested of individual	Seafood supply chain	Germany
Redacted at request of individual	Redacted at requested of individual	Seafood supply chain	Germany
Redacted at request of individual	Redacted at requested of individual	Seafood supply chain	Germany
Sandor, Adam	SEAFOOD HUNGARY KFT	Seafood supply chain	Hungary
Katsuhiko Yoshinaga	Ishihara Suisan Co., Ltd.	Seafood supply chain	Japan
Yasuhiro Abe	Abecho Shoten Co., Ltd.	Seafood supply chain	Japan
Yasutaka Hanada	Maruto Suisan Co., Ltd.	Seafood supply chain	Japan
Redacted at request of individual	Redacted at requested of individual	Seafood supply chain	Japan
Erald De Groot	POSEIDON FOOD B.V.	Seafood supply chain	Netherlands
Aleksandra Selonke	MILAREX Sp. z.o.o.	Seafood supply chain	Poland
Redacted at request of individual	Redacted at requested of individual	Seafood supply chain	Singapore
Alicia Pousa Comesaña	MARINA FISH EXPORT, S.L.	Seafood supply chain	Spain
Héctor Martín Fernández Álvarez	BOLTON FOOD	Seafood supply chain	Spain
Jaime Rico	Frime SAU	Seafood supply chain	Spain
Pablo Mugica	FRIME	Seafood supply chain	Spain
Redacted at request of individual	Redacted at requested of individual	Seafood supply chain	Spain
Redacted at request of individual	Redacted at requested of individual	Seafood supply chain	Spain
Redacted at request of individual	Redacted at requested of individual	Seafood supply chain	Switzerland
Redacted at request of	Redacted at requested of	Seafood supply chain	Switzerland

individual	individual		
Adam Townley	New England Seafood	Seafood supply chain	UK
Russell Parish	J BENNETT (BILLINGSGATE) LTD	Seafood supply chain	UK
Redacted at request of individual	Redacted at requested of individual	Seafood supply chain	UK
Redacted at request of individual	Redacted at requested of individual	Seafood supply chain	UK
Redacted at request of individual	Redacted at requested of individual	Seafood supply chain	UK
Redacted at request of individual	Redacted at requested of individual	Seafood supply chain	UK
Redacted at request of individual	Redacted at requested of individual	Seafood supply chain	Unknown
Redacted at request of individual	Redacted at requested of individual	Seafood supply chain	Unknown
Ira Perry	AMT/Organic Gem	Seafood supply chain	USA
Jeffrey Young	Advanced Marine Technologies	Seafood supply chain	USA
Jonathan Gonzalez	Pacific Seafood Group	Seafood supply chain	USA
Keith Schloemer	Raffield Fisheries, Inc.	Seafood supply chain	USA
Mark Saluti	Quality Custom Packing Inc.	Seafood supply chain	USA
Redacted at request of individual	Redacted at requested of individual	Seafood supply chain	USA
Redacted at request of individual	Redacted at requested of individual	Standard setting	Canada
Redacted at request of individual	Redacted at requested of individual	Standard setting	USA
Redacted at request of individual	Redacted at requested of individual	Unknown	Australia
Redacted at request of individual	Redacted at requested of individual	Unknown	France
Redacted at request of individual	Redacted at requested of individual	Unknown	France
Redacted at request of individual	Redacted at requested of individual	Unknown	France
Redacted at request of individual	Redacted at requested of individual	Unknown	France
Redacted at request of individual	Redacted at requested of individual	Unknown	France
Redacted at request of individual	Redacted at requested of individual	Unknown	France
Redacted at request of individual	Redacted at requested of individual	Unknown	France



Redacted at request of individual	Redacted at requested of individual	Unknown	France
Redacted at request of individual	Redacted at requested of individual	Unknown	France
Redacted at request of individual	Redacted at requested of individual	Unknown	Germany
Redacted at request of individual	Redacted at requested of individual	Unknown	Ireland
Redacted at request of individual	Redacted at requested of individual	Unknown	Japan
Redacted at request of individual	Redacted at requested of individual	Unknown	Spain
Redacted at request of individual	Redacted at requested of individual	Unknown	Switzerland
Christina Burrige/Andy Hough	ASF	Unknown	Unknown
Redacted at request of individual	Redacted at requested of individual	Unknown	Unknown
Redacted at request of individual	Redacted at requested of individual	Unknown	Unknown
Julie Decker, Tommy Sheridan	AFDF	Unknown	USA
Redacted at request of individual	Redacted at requested of individual	Unknown	USA
Redacted at request of individual	Redacted at requested of individual	Unknown	USA
Ghislaine Llewellyn	WWF	Non-governmental organisation	* Australia, Argentina, Belgium, Bhutan, Bolivia, Brazil, Bulgaria, Cambodia, Cameroon (+ Central Africa), Canada, Central America & Caribbean, Chile, China, Colombia, Croatia, Denmark, Ecuador, Fiji (+ Southern Pacific), Finland, France, Georgia, Germany, Greece, Hungary, India, Indonesia, Italy, Japan,

			Kenya (+ Eastern Africa), Laos, Latvia, Madagascar (+ Indian Ocean), Malaysia, Mexico, Mongolia, Mozambique, Nepal, Netherlands, New Zealand, Nigeria, Norway, Pakistan, Papua New Guinea, Paraguay, Peru, Philippines, Poland, Portugal, Romania, Russia, Serbia, Singapore, Slovakia, South Africa, South Korea, Spain, Suriname (+ Guianas), Sweden, Switzerland, Tanzania, Thailand, Tunisia, Turkey, Uganda, Ukraine, United Arab Emirates, United Kingdom, United States, Venezuela, Vietnam (+ Mekong Region) Zambia, Zimbabwe
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* For analysis purposes in the summary tables WWF were regarded as Australia to match the initial survey response. A full list of countries WWF represent can be seen in the table above.



Annex XVIII: Feedback tables

[The feedback tables](#) provide raw responses to the consultation. Please see the [pdf of the survey](#) and the below draft MSC program documents for context:

- [Draft MSC Fisheries Standard](#)
- [Draft MSC Fisheries Standard Guidance](#)
- [Draft MSC Fisheries Certification Process](#)
- [Draft Fisheries Certification Process Guidance](#)
- [Draft MSC Fisheries Toolbox](#) (developed as part of the Fisheries Standard Review).



Annex XIX: Letter responses

Alongside responses to the online survey, we received 29 emailed responses in the form of letters or documents. The letters were analysed in addition to the survey feedback. For those that consented, their submissions have been published.

[Letter responses to the consultation on the proposed revised MSC Fisheries Standard](#)

