



Via Electronic Transmission

June 10, 2026

Senator Bill Cassidy, M.D.
Chairman
U.S. Senate Committee on Health,
Education, Labor and Pensions

Senator Tommy Tuberville
Chairman
Subcommittee on Education and the
American Family

Dear Senator Cassidy and Senator Tuberville:

Thank you for reaching out the Marine Stewardship Council (MSC) and for your interest in learning more about the MSC program. I am writing in response to your letter to Rupert Howes dated May 27, 2026, and to provide responses to your questions. We welcome the dialogue and the opportunity to explain the rigor behind MSC's certification and ecolabeling program.

About the Marine Stewardship Council (MSC)

The MSC is an international nonprofit organization that works to improve the way our ocean is fished and incentivize people to produce and consume seafood sustainably. This is accomplished through the MSC Fisheries Standard, MSC Chain of Custody Standard, and verified use of the MSC blue fish ecolabel.

The MSC's vision is of the world's ocean teeming with life, and seafood supplies safeguarded for this and future generations.

The MSC's mission is to use our ecolabel and fishery certification program to contribute to the health of the world's oceans by recognizing and rewarding sustainable fishing practices, influencing the choices people make when buying seafood and working with our partners to transform the seafood market to a sustainable basis.

Wild capture fisheries are the world's last, truly wild source of commercially available food. Seafood from wild fisheries provides food security for millions of people around the world who rely on it as a primary source of protein. Seafood is also vital to the livelihoods of fishermen and fishing communities in the United States, and around the world.

Unfortunately, according to the Food and Agriculture Organization of the United Nations 2025 report on their [review of the state of world marine fishery resources](#), 35.5% of global fisheries are overfished, in large part due to illegal and destructive fishing. Independent scientists have published peer-reviewed studies that estimate that worldwide fishery stocks have declined by nearly 50% in the last 40 years.

Since our founding in 1997, the MSC has partnered with fisheries, scientists, suppliers, retailers and brands, management bodies, governments, and other seafood and ocean experts, to improve the way our oceans, lakes, and rivers are fished. Fish populations can recover and replenish if they are managed carefully for the long-term. If all fisheries used sustainable practices, they could produce 16 million more tons of wild-caught seafood, which according to MSC analysis, would meet the protein needs of 72 million more people and help ensure greater stability of fisheries for future generations.

The MSC program is a certification and ecolabel program for wild-caught, environmentally sustainable seafood. Participation in our program is entirely voluntary. Third party certification provides the highest level of assurance that the seafood product is verified to be sustainable/responsible, is harvested legally, and is traceable back to a sustainable source. The MSC goes to great lengths to ensure we meet the highest international benchmarks for credible certification and ecolabeling and that the MSC Fisheries Standard reflects best practice in fisheries management.

When you see the MSC blue fish label on seafood packaging, it means that the seafood product is:

1. Sustainably sourced – The stocks are fished in a way that does not threaten the population's long-term health and minimizes the damaging effects of fishing to the surrounding wildlife and ecosystem.
2. Independently Verified – You can feel confident that it is sourced from a fishery that is certified sustainable to the MSC's Standards.
3. Wild-Caught – The seafood comes from the ocean, lakes, or rivers from wild populations.

How we maintain best practices globally

The MSC is the only global wild-capture fisheries certification program that simultaneously meets best practice requirements set by the UN Food and Agriculture Organization and has been independently evaluated against ISEAL's Codes of Good Practice.

The MSC runs the first certification program for wild caught seafood to be recognized by the Global Sustainable Seafood Initiative (GSSI), an independent benchmark for the credibility of sustainable seafood certification programs. The MSC program meets all the essential components of the GSSI benchmark, and a further 63 supplementary components relating to issues such as deep sea fishing and vulnerable marine ecosystems. We also have additional safeguards built into our program such as appointing Assurance Services International (ASI) as an external oversight body for our conformity assessment bodies, requiring assessor compliance to ISO 17065, peer review for fisheries assessments, to name a few. Additionally, we've been recognized by the UN as a major ocean stakeholder, contributing to the UN Sustainable Development Goals and tracking progress towards international goals of ending overfishing and protecting biodiversity.

Our governance

We work hard to ensure our standards, strategy and decision-making take account of the views, expertise and experience of a wide range of perspectives, from academia and government, the fishery and market sectors, and the environmental NGO community. Our governance structure therefore involves a wide range of individuals with different perspectives to ensure that the MSC's decisions are balanced, reflecting many sectors and interests.

MSC Board of Trustees: The MSC Board of Trustees is our governing body. With advice from the MSC Executive Committee, Technical Advisory Board and Stakeholder Advisory Council, it sets the strategic direction of the MSC, monitors progress and ensures the MSC meets its objectives. Trustees are chosen for their knowledge, expertise and support for the MSC. Membership is balanced, encompassing expertise and experience from different sectors and geographical regions (as well as other relevant demographic criteria) to reflect the broad mix of perspectives required for MSC to fulfil its charitable aims.

MSC Technical Advisory Board: The Technical Advisory Board (TAB) works in close collaboration with the MSC Executive Committee to advise the MSC Board of Trustees on technical and scientific matters relating to the MSC Standards and associated policies, including developing methodologies for certification and accreditation, as well as related scientific and technical research. The Technical Advisory Board is appointed by the MSC Board of Trustees, either following an open, external recruitment process or based on recommendations from the MSC Governance Committee and the Technical Advisory Board. Members are nominated in a personal capacity not as representatives of their organizations.

MSC Stakeholder Advisory Council: The MSC Stakeholder Advisory Council (STAC) works in close collaboration with the MSC Executive Committee to advise the MSC Board of Trustees on relevant strategic, policy or operational issues, including input into the MSC's formal Standard review processes. It includes representatives from the seafood industry, conservation community, market sector and academia. Its membership reflects diverse expertise, experiences, geographies and interests in relation to the work of the MSC. The STAC is also a formal channel through which all stakeholders, whether members of the STAC or not, can provide their views to the MSC.

Transparent funding model

The MSC is dedicated to full transparency about where its funding comes from. The MSC is an independent nonprofit organization and not a commercial enterprise. Our income is derived from two sources: 1) charitable donations from foundations and 2) licensing of the MSC blue fish ecolabel.

We do not receive any income from fisheries or third-party certification auditors who assess fisheries sustainability.

Licensing Fees: Brand products, restaurants, and other companies that are certified and voluntarily wish to show their seafood is from an MSC certified source must pay a royalty fee each time an item with the label is purchased. As a nonprofit, any income generated from these fees is reinvested back into our efforts to further sustainable fishing initiatives, including research, management improvement, and more. Each year, the MSC commits 5% of annual royalties, together with contributions from mission-aligned partners including foundations and corporate partners to [The Ocean Stewardship Fund \(OSF\)](#), a grant making program created and hosted by the MSC. The OSF provides grants for fishery improvements and funds important research.

Charitable Donations: We are especially grateful for the significant support we receive from a range of charitable funders, including trusts, foundations, and statutory bodies from across the globe.

A report on our yearly funding can be found in our latest [annual report](#).

Questions from the Committee:

- 1. How does the Marine Stewardship Council (MSC) develop its MSC Fisheries Standard and MSC Chain of Custody Standard?**

The MSC maintains two standards – the MSC Fisheries Standard and the joint MSC/ASC Chain of Custody standard. Supporting these are many other certification processes and policies.

The MSC Fisheries Standard is used to assess whether a fishery is environmentally sustainable and well managed, and is based on three core principles:

1. sustainable fish stocks,
2. minimizing environmental impacts, and
3. effective fisheries management.

The MSC Chain of Custody (CoC) Standard ensures seafood sold with the MSC ecolabel can be traced back through the supply chain to a certified sustainable source. The CoC Standard is based on five core principles:

1. certified products are purchased from a certified supplier,
2. certified products are clearly identifiable,
3. certified products are separated from noncertified,
4. certified products are traceable and volumes are recorded, and
5. management systems address all requirements of the standard.

The MSC develops its Fisheries Standard and MSC Chain of Custody Standard and associated policy documents through a transparent, science-based, and multi-stakeholder process designed to reflect international best practices and evolving scientific understanding. Our standard reviews are consistent with best practice codes and guidelines provided by the UN Food and Agriculture Organization (FAO), ISEAL and the Global Sustainable Seafood Initiative (GSSI). All standards and processes are reviewed every five years, at a minimum.

Our standards are developed and revised through a formal process that includes:

- **Internal review of issues raised:** Issues are tracked, reviewed, investigated, and prioritized by the MSC and governing bodies.
- **Independent expert input:** MSC convenes technical experts, scientists, fisheries managers, supply chain representatives, NGOs, retailers, and industry stakeholders to provide input and review proposed changes.
- **Science and best practice review:** Standards are informed by the latest peer-reviewed science, international frameworks and guidelines, including those established by organizations such as the Food and Agriculture Organization of the United Nations.
- **Public consultation:** Drafts are published for public comment, allowing stakeholders from around the world to participate and provide feedback.
- **Governance and oversight:** Proposed changes are reviewed through MSC's governance structures and independent advisory bodies to ensure consistency, credibility, and accountability.
- **Regular updates:** The standards are periodically reviewed to ensure they remain robust, credible, and responsive to emerging environmental, scientific, and market developments. The MSC standards-setting process follows internationally recognized codes of good practice for sustainability standards, with the goal of maintaining confidence among fisheries, supply chain partners, conservation organizations, and consumers.

For more information, including our current standards and program reviews, please visit our website: [MSC: Developing our standards.](#)

2. How does the MSC collaborate with its members when developing its MSC Fisheries Standard and MSC Chain of Custody Standard?

MSC is not a membership organization, but rather an independent, international nonprofit. The MSC program is voluntary, and fisheries or supply chain companies can choose to be assessed against our standards through a third-party process undertaken by auditors known as Conformity Assessment Bodies (CABs). Certified fisheries, seafood businesses, and brands are voluntary partners of the MSC. Additionally, the MSC engages regularly with the broader ocean and seafood community outside of certification. This may include academics, fellow NGOs, governments, associations, etc. We consider the members of this broader group to be among the stakeholders of our program.

Our Standard reviews are consistent with best practice codes and guidelines mentioned previously. As a part of these international best practices, our program and standard reviews engage academics, fellow NGOs, governments, industry, and any other stakeholder interested in participating in our policy development.

Stakeholders are at the heart of our program and provide invaluable feedback that helps identify issues, develop solutions and tests the possible impacts of any proposed changes. At the time of this letter, review of both standards is currently underway: our Chain of Custody Standard is being reviewed in its entirety, and our fisheries program (Standard and process) are being reviewed for targeted changes. The aim is to release new versions in early 2027, with public consultations occurring for both processes. Information on how to participate in consultations and sign up to be notified on our website: [MSC: Developing our Standards.](#)

Our last full review of the MSC Fisheries Standard included two public consultations and a 60-day public review period. Throughout the multi-year review period, we received over 600 submissions and nearly 200 people attended online workshops. All stakeholder feedback was considered equally and objectively and fed into our policy development process.

3. Since 2021, how many safety complaints has the MSC received from regulators including the U.S. Food and Drug Administration? How were those complaints addressed?

Our team has reviewed our internal logs and inboxes and did not locate any correspondence from the U.S. Food and Drug Administration, specifically, or other regulators, generally, regarding safety complaints.

As an environmental nonprofit, food safety falls outside the scope of the MSC certification program. MSC's fishery certification validates that a fishery is well-managed and is sustaining resources and livelihoods for future generations. MSC's Chain of Custody certification provides assurance that all seafood sold with the MSC blue fish ecolabel comes from a fishery that has been certified to the MSC Fisheries Standard.

We regularly conduct consumer research about the MSC, which indicates that seafood consumers and stakeholders understand the Marine Stewardship Council as an environmental nonprofit that has a certification and ecolabel for environmentally sustainable fishing. It's uncommon for consumers to associate our program with food safety.

When we receive complaints about the quality of an MSC labeled product, which does occasionally occur, our team does its best to forward to the appropriate recipient and/or encourage people to direct their concerns to the company selling the product

4. Does the MSC have an internal process to review member practices in safe and responsible fishing practices?

The scope of MSC's certification program is environmentally sustainable fisheries and fishing practices. Food safety is outside the scope of our program as are claims on 'responsible'. This is an important distinction to note as new legislation in the European Union has determined claims around 'sustainable' or 'responsible' to be broadly encompassing of environmental sustainability and social responsibility, which extend beyond the scope of our program.

Putting the question of scope aside, the MSC has many processes in place to ensure that partners are adequately adhering to our standards and the associated requirements.

The MSC is a third-party certification program, which means we do not assess or certify fisheries directly; rather we maintain the standard they have to meet. Fishery assessments are carried out by CABs with teams of experts in fisheries science and management who are independent of the fishery and the MSC. The same is true for Chain of Custody certification.

Third-party certification is widely regarded as the most trustworthy system for objective assessments, but there can still be risks to the integrity of any system. These can include real or perceived conflicts of interest.

To mitigate these risks, we have built in additional safeguards, including:

- Appointing Assurance Services International (ASI) as an external oversight body for conformity assessment bodies.
- Ensuring CABs follow [ISO 17065](#), an international Standard used in many sectors including food safety, to ensure that assessment teams operate in a competent, consistent and impartial manner.
- Providing mandatory online training and relevant qualification requirements for assessors.
- Publishing assessment reports on our [Track a Fishery](#) website.
- Including independent peer review to check the expert judgement within fishery assessments. Find out more about the MSC Peer Review College and review process

All MSC certified fisheries and Chain of Custody certified businesses are audited every year to check for compliance.

Additionally, there are regularly scheduled and incident-specific reviews that are conducted of CAB assessments within our assurance network and with MSC teams.

a. What enforcement tools does the MSC have if a member is found to be in violation of its MSC Fisheries Standard and MSC Chain of Custody Standard?

The MSC has processes in place to address concerns, violations, or misconduct for any MSC certified partner. When a complaint or allegation is made against an MSC certified partner, it triggers specific mechanisms in the MSC process to review evidence or new information and determine if any actions need to be taken. More information about the complaints process can be found on our website: [MSC: Submitting a complaint](#).

If a complaint or allegation is made against a specific MSC certified fishery or business, the next course of action is to contact the CAB. CABs are required to maintain a complaints process. If the results of that process are unsatisfactory, complaints can be escalated to ASI, the independent body which oversees CAB activities. This may lead to ASI investigating reported incidences of non-compliance. Incidents can also be directly reported to ASI anonymously and can relate to any activity or concern that threatens the credibility of the MSC program or ASI. Complaints may or may not be shared with the MSC.

Additionally, in December 2024, MSC implemented our [Rules on Unacceptable Conduct](#). Unacceptable conduct is defined as conduct/behavior or circumstances within a certificate holder or applicant that is not aligned with the values and mission of the MSC, which is unlawful or contributes to harm, prejudice to the brand, goodwill, or reputation or image of the MSC. The implementation of this ruling provides the MSC with pathways to take action against specific certificate holders, if warranted.

b. Since 2021, how many enforcement actions have been taken by the MSC if a member is found to be in violation of its MSC Fisheries Standard and MSC Chain of Custody Standard, does the MSC report those violations to regulators?

The MSC does not maintain a single consolidated metric for "enforcement actions" because compliance and certification decisions are made by CABs and may result in a range of outcomes, including minor, major, and critical non-conformities, certificate suspensions, and certificate withdrawals.

For MSC certified fisheries:

An MSC Fisheries certificate is good for five years and certified fisheries are subject to annual surveillance audits, and reassessment after five years if they choose to remain in the program. In addition, an emergency audit may be triggered in cases where there may be changes in a fishery's practices or external circumstances such as stock changes. If an audit reveals that the fishery no longer meets the MSC Standard or has not made adequate progress towards meeting conditions or may have denied a surveillance audit, the MSC program allows for CABs to suspend a fishery's certificate.

As suspensions impact the entire supply chain selling the certified product, the CAB will give a 30 days' notice period to pre-emptively inform those impacted. This gives the supply chain ample opportunity to find an alternative sustainable source of product or change packaging or marketing plans. Seafood caught after the suspension date can no longer be sold as MSC certified. The fishery has 90 days from the suspension date to submit a corrective action plan, addressing the cause of suspension to the CAB. If accepted, the corrective action plan must be implemented by the fishery and verified by the CAB before the certificate is reinstated. If the fishery fails to produce an action plan or rectify the situation in the time allowed, the certificate will be withdrawn.

Fisheries can also self-suspend their certificate themselves, but they are not required to submit a corrective action plan for their certificate to be reinstated. If a fishery wishes to reinstate their certificate, the CAB will hold a surveillance audit to ensure the fishery remains in compliance with surveillance audit timing and progress on conditions. CABs can also suspend or cancel a certificate for a contractual or administrative reason such as late payments of CAB invoices or delays in the audit schedule due to unforeseen circumstances. The suspension process is an important component of the MSC program. It allows a suspended fishery to retain their certificate throughout the suspension period and incentivizes fisheries to make improvements to meet the MSC Fisheries Standard.

For the suspension to be lifted, the fishery certificate holder must address the cause of suspension by following a corrective action plan. The fishery client has 90 days from the suspension date, to submit a corrective action plan to the CAB. If accepted, the corrective action plan must be implemented by the fishery and verified by the CAB before the certificate is reinstated. If a fishery has chosen self-suspension, a corrective action plan is not necessary.

For reinstatement of a fishery certificate, the assessors will perform a surveillance audit. The surveillance audit is to verify whether the fishery conforms to the MSC Fisheries Standard again, and to verify the progress on outstanding conditions. The fishery must remain in compliance with the deadlines set for conditions.

A fishery that no longer meet the MSC scope requirements will have its certificate withdrawn, which means it is no longer in the program. Fisheries that do not submit a corrective action plan or rectify the situation in the time allowed after a suspension, will also have its certificates withdrawn. A fishery may choose not to be re-assessed for certification at the end of the five-year certification period, constituting a voluntary withdrawal from the program. Fisheries may voluntarily withdraw from the MSC program at any time.

A full list of the reasons a CAB may suspend a fishery and resulting procedures are listed in MSC's [General Certification Requirements v2.6 7.4](#) Suspension or withdrawal of certification, starting on page 27.

Suspensions are a rare but integral part of our program. As of June 10th, 48 fisheries are currently in a suspended status compared to 613 certified fisheries. Since 2021, the following actions have been taken for MSC certified fisheries:

- 208 fisheries have been suspended
- 196 fisheries have been withdrawn from our program (this may be voluntary or consolidation to a new certificate)

For MSC Chain of Custody (CoC) certified businesses:

MSC CoC certified businesses have a similar but slightly different approach to non-compliance. First, all certificate holders are required to have processes in place to deal with non-conforming product which includes remedying the issue and reporting it to the CAB. Additionally, at any point during the certificate holder's certification, a CAB can raise a non-conformity if there is an issue resulting in non-compliance with the Chain of Custody standard. Non-conformities are graded as either major or minor, with requirements for an action plan to implement corrective actions within 30 and 60 days respectively.

For major incidents representing a breakdown in integrity to the intentions of the program or due to actions or in-action by the client, the CAB can suspend a CoC certificate. The duration of the suspensions may vary depending on the cause, but reconciliation involves the client submitting and implementing a corrective action plan than includes addressing the root cause of the issue within the timeframe. If this does not occur, the certificate is withdrawn.

A full list of the reasons a CAB may suspend a CoC certified business and resulting procedures are listed in MSC's [General Certification Requirements v2.6 7.4](#) Suspension or withdrawal of certification, starting on page 27.

Since 2021, the following actions have been taken for Chain of Custody certified businesses:

- 192 certificates suspended
- 106 suspended certificates reinstated
- 147 withdrawn certificates (can also be voluntary)
- 30 withdrawn certificates reinstated
- 73 incidents investigated with the MSC team

The MSC does not routinely report MSC Standard non-compliance to regulators. Often, actions by regulatory enforcement bodies inform decisions related to conformity with our standards. Where non-compliance with MSC requirements is identified, the primary mechanism for addressing such issues is through the MSC assurance system, including corrective actions, non-conformities, suspension, or withdrawal of certification, as determined by the CAB. When complaints or issues are received that are outside of the scope of MSC certification, our team does its best to forward to the appropriate recipient.

Thank you for your time and for your attention to this matter. I welcome the opportunity to provide any additional information or discuss this issue further with you and your staff.

Sincerely,



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