

Wageningen, 12 July 2016

**Subject:** Response to your letter dated 5 April 2016

Dear Alison Cross

Many thanks for taking the time to provide your comments on the GSSI Benchmark Report for the Alaska Responsible Fisheries Management Certification Program (Alaska RFM Program). WWF has played a valuable role in the development of the Global Benchmark Tool as part of the Expert Working Group on Aquaculture, by being on the GSSI Steering Board and during GSSI public consultations.

GSSI is committed to a transparent benchmark process with opportunity for engagement and comments. In response to the requests received during the public consultation, a user-friendly benchmark report was published to accompany the spreadsheet.

Following the consultation, GSSI's response to WWF comments raised in relation to the GSSI Benchmark conclusions for the Alaska RFM Program are set out below. For comments relating to the GSSI Benchmark Tool, please refer to our factsheet (attached), which provides information on the rigorous 7-step Benchmark Process and the value behind GSSI recognition. For more information: [www.ourgssi.org](http://www.ourgssi.org).

**WWF comment:** *Very little information and evidence are provided by ASMI, the independent expert, and the benchmark committee as to the specific, clear rationale for the scheme being in alignment with the relevant GSSI requirement. See, for example, D.2.09.01, where the scheme was considered not in alignment in the expert's initial comments, but designated as in alignment in the final comments after further information was provided by ASMI that does not actually address the component.*

A full range of evidence has been provided by the Alaska RFM Program, the Independent Expert and the Benchmark Committee setting out why Alaska RFM is in alignment with the GSSI Components. For GSSI Supplementary Component D.2.09.01 additional evidence was supplied in Clauses 3.2.4, 3.2.5 and 3.2.6 dealing with management objectives during the Alaska RFM and the Independent Expert exchange.

In more detail, the GSSI guidance for D.2.09.01 deals with management objectives addressing a range of specific ecosystem topics (non-target species, habitat, food web, etc.) that have been developed through a comprehensive and integrated economic, social and environmental analysis.

The multiple RFM and Guidance clauses provide evidence that the scheme considers the necessary socio-economic and environmental analysis, as well as the specific objectives relative to addressing the range of specific ecosystem topics (non-target species, habitat, food web) specified in the GSSI guidance.

**Conclusion on GSSI Supplementary Component D.2.09.01**

Conclusion:

*The Alaska RFM Program is in alignment because the combination of management objectives setting for ecosystem structures, processes and functions that are likely to be irreversible or very slowly reversible is covered by the RFM Version 1.3 Clause 3.2.6. Clauses 3.2.4, 3.2.5 deal with management objective setting for biodiversity of aquatic habitats and ecosystems, essential habitats for the stock under consideration and on habitats that are highly vulnerable to damage by the fishing gear of the unit of certification. The use of economic, environmental, and social inputs to setting objectives is ensured through the combination of Clauses 2.5, 4.5, and 8.1.*

*Clause 2.5 provides that "The economic, social and cultural value of coastal resources shall be assessed in order to assist decision-making on their allocation and use."*

*Clause 4.5 provides that "States shall insure that sufficient knowledge of economic, social, marketing and institutional aspects of fisheries is collected through data gathering, analysis and research."*

*Clause 8.1 provides that "Conservation and management measures shall be designed to ensure the long-term sustainability of fishery resources at levels which promote the objective of optimum utilization, and be based on verifiable and objective scientific and/or traditional sources. In the evaluation of alternative conservation and management measures, their cost-effectiveness and social impact shall be considered".*

Evidence:

*Version 1.3, RFM Standard: Clause 2.5, p.13; Clause 4.5, p.16; Clause 8.1, p.20; Clause 3.2.4, 3.2.5, 3.2.6, p.14-15*

The judgment went from "follow up during office visit" to "in alignment" because the new Standard Version 1.3 was used for the benchmark. According to the Global Benchmark Tool Manual "New versions can be used for the benchmark but must be finalized and approved and first evidence of implementation will be available shortly (depending on the nature of the change and the normal frequency of implementation of this change)." During the office visit, dates were agreed between GSSI and the Alaska RFM Program for sharing the first reports, in order to provide full transparency around what is understood as 'shortly.'

### **Example for Version 1.3 of the Alaska RFM Standard**

*Version 1.3 of the Alaska RFM Standard/Guidance will be used first to re-certify the Alaska Salmon Fishery. This re-certification effort has been awarded to Global Trust who will start work in April 2016. Timelines are as follows:*

- *March 2016 - Announcement of Assessment & Assessment Team Notification*
- *April 2016 - Site Visits*
- *July/August 2016 - Client Draft Report to Client (before Peer Review)*
- *early September 2016 - Peer Review*
- *September/October 2016 - Registered Stakeholder comment period and responses*
- *mid-November 2016 - Final draft to Certification Committee*
- *10 December 2016 - Certification Date*

*Global Trust has confirmed that GSSI will receive a draft assessment report to verify implementation of Version 1.3 in July/August 2016 as long as a statement of confidentiality is provided. Global Trust and DNV received RFM Standard Version 1.3, related Guidance and Scoring document, Procedures and related information in January.*

**WWF comment:** *In at least one instance, the evidence provided does not justify alignment of the scheme with the GSSI component. For example, in D.1.09.01, none of the information provided makes specific reference to the effectiveness and suitability of MCS and enforcement related to the management of bycatch and reduction of discards, or to explicit requirements for MCS and enforcement related to bycatch/discards. There is no evidence provided that the scheme is fully in alignment.*

The evidence cited in the Benchmark Conclusions includes general MCS and observer provisions, plus specific data requirements related to discards and bycatch. The standard is evaluated at the level of Governance and Operational management, covered in Sections A and B of the GSSI Global Benchmark Tool. Alignment across these sections means that Alaska RFM is in alignment with the GSSI Component.

### **Conclusion on GSSI Supplementary Component D.1.09.01**

**Conclusion:**

*The Alaska RFM Program is in alignment because the standard V1.3 includes general MCS and observer provisions, plus specific data requirements related to discards and bycatch. The following clauses are relevant:*

*Clause 10.1 "Effective mechanisms shall be established for fisheries monitoring, surveillance, control and enforcement measures including, where appropriate, observer programs, inspection schemes and vessel monitoring systems, to ensure compliance with the conservation and management measures for the fishery in question."*

*Clauses 10.3-10.4.1 include specific requirements for monitoring, control, surveillance and enforcement of fishing activities in international waters.*

*Clause 4.1 "Reliable and accurate data required for assessing the status of fisheries and ecosystems - including data on retained catch of fish, bycatch, discards and waste shall be collected."*

*Clause 5.2 "The state of the stocks under management jurisdiction, including the impacts of ecosystem changes resulting from fishing pressure, pollution or habitat alteration shall be monitored."*

*Clause 10.2 "Fishing vessels shall not be allowed to operate on the resource in question without specific authorization."*

*Clause 4.2 "An observer scheme designed to collect accurate data for research and support compliance with applicable fishery management measures shall be established."*

*Clause 11.1 "National laws of adequate severity shall be in place that provide for effective sanctions."*

*Clause 11.2 "Sanctions applicable in respect of violations and illegal activities shall be adequate in severity to be effective in securing compliance and discouraging violations wherever they occur."*

**Evidence:**

*Version 1.3, RFM Standard: Clause 10.1, p.23; Clause 4.1, p.15; Clause 5.2, p.17; Clause 10.2, p.23; Clause 4.2, p.16; Clauses 10.3-10.4.1, p.23; Clause 11.1, p.24; Clause 11.2, p.24*

**WWF comment:** *Some information provided as evidence is irrelevant to the GSSI requirement, making the analysis of the scheme against the requirement difficult to review. For example, the evidence provided for D.1.03 is largely tangential to the GSSI requirement regarding regular meetings of the fishery management organization.*

GSSI Components are not designed to be prescriptive as to how a scheme meets a particular component and diverse approaches are welcomed. While the Alaska RFM does not explicitly require "regular meetings" of the Fishery Management Organization, it does require the delivery of timely information and best available scientific advice, together with the evidence cited alongside checked documentation and practice. The requirement for a continuous review and revision of conservation and management measures in regards to fisheries regulations is central to the RFM standard and has similar and connected requirements. The evidence provided has shown the Alaska RFM in alignment with this GSSI Component. Further evidence is provided from the flatfish assessment report that shows application of this requirement in practice.

### **Conclusion on GSSI Supplementary Component D.1.03**

**Conclusion:**

*The Alaska RFM Program is in alignment although "regular meetings" are not explicitly required by the Fishery Management Organization (FMO), delivery of timely information and best available scientific advice is required. Furthermore, the evidence cited, and checked documentation and practices supports this conclusion.*

**The Standard states:**

*Clause 1.7 Procedures shall be in place to keep the efficacy of current conservation and management measures and their possible interactions under continuous review to revise or abolish them in the light of new information. Meetings are intrinsic to meeting many of the requirements set out in the standard and guidance - for example, many clauses in the guidance recognize the records of meetings as evidence that the clause is met (e.g. 1.3, 3.2.3, 8.3). There are many clauses which could not be met without regular meetings e.g. in Clause 1.1, a legal and administrative framework cannot be considered effective unless there is regular communication between the relevant authorities, industry and other stakeholders exchanging information and affecting decision making in a transparent way. In addition, there are clear requirements for these data to be collected, reviewed and distributed to enable the management system to operate and manage the fish resources under their jurisdiction. Clause 4.1. Timely, complete and reliable statistics shall be compiled on catch and fishing effort and maintained in accordance with applicable international standards and practices and in sufficient detail to allow sound statistical analysis for stock assessment. Such data shall be updated regularly and verified through an appropriate system. These data shall be collected, at an appropriate time and level of aggregation, by relevant management organizations connected with the fishery, and provided to relevant States and sub-regional, regional and global fisheries organizations. Clause 4.1.1 Timely, complete and reliable statistics shall be compiled on catch and*

*fishing effort and maintained in accordance with applicable international standards and practices and in sufficient detail to allow sound statistical analysis for stock assessment. Such data shall be updated regularly and verified through an appropriate system. The use of research results as a basis for the setting of management objectives, reference points and performance criteria, as well as for ensuring adequate linkage, between applied research and fisheries management (e.g. adoption of scientific advice) shall be promoted. Results of analysis shall be distributed accordingly as a contribution to fisheries conservation, management and development.*

*Clause 5.1.2. Results of analyses shall be distributed in a timely and readily understandable fashion in order that the best scientific evidence is made available as a contribution to fisheries conservation, management and development.*

*Furthermore, the following clause requires some of the information listed above to be available to ensure effective enforcement activities. Clause 10.1. Effective mechanisms shall be established for fisheries monitoring, surveillance, control and enforcement measures including, where appropriate, observer programs, inspection schemes and vessel monitoring systems, to ensure compliance with the conservation and management measures for the fishery in question. This could include relevant traditional, fisher or community approaches, provided their performance could be objectively verified.*

Evidence:

*Version 1.3 of the RFM Standard Clause 1.3. p.10; Clause 3.2.3. p.14; Clause 8.3 p.21*

*Version 1.3 of the RFM Guidance. Clause 1.3 p.11, Clause 3.2.3 p.28, Clause 8.3 p.61, Clause 4.1, p.32, p.33. The Alaska Flatfish RFM Assessment report of January 2014 provides evidence of this in practice. See p.190, 191, 260.*

Many thanks again for participating in the public consultation and we do hope that the above responses have been helpful. We look forward to continuing GSSI's collaboration with WWF going forward.



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GSSI Program Director



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Global Sustainable Seafood Initiative  
GSSI Benchmark Committee

April 5, 2016

### **WWF Network Comments on ASMI GSSI Benchmark Report**

Dear GSSI Benchmark Committee:

Thank you for providing an opportunity to comment on the ASMI GSSI benchmark report.

WWF, the world's largest conservation organization, believes in the power of credible certification programs to support and drive sustainable resource use. We have nearly 20 years of experience working on the development, maintenance, and credibility of seafood certification programs. We support credible certification programs and have a strong interest in ensuring that the terms "credible," "responsible," and "sustainable" are clearly defined, differentiated, and applied appropriately in the marketplace.

Due to the nature of our overarching comments on the ASMI report, WWF will not be submitting detailed comments on the individual components. Instead, we outline our main concerns below:

- The report in Excel form is incredibly difficult to review, with key information presented in rows and columns that cannot be simultaneously seen on screen. We strongly suggest revising the report format so that it is readable by stakeholders and meaningful comments can be provided.
- As previously noted, the structure and flow of the GSSI requirements are difficult to follow, with, for example, ecosystem effects in several categories.
- The guidance provided by GSSI is not well-developed, and the existing guidance is not even mandatory; therefore the requirements are subjective and largely open to very wide interpretation by the expert/s.
- Very little information and evidence are provided by ASMI, the independent expert, and the benchmark committee as to the specific, clear rationale for the scheme being in alignment with the relevant GSSI requirement. See, for example, D.2.09.01, where the scheme was considered not in alignment in the expert's initial comments, but designated as in alignment in the final comments after further information was provided by ASMI that does not actually address the component.
- In at least one instance, the evidence provided does not justify alignment of the scheme with the GSSI component. For example, in D.1.09.01, none of the information provided makes specific reference to the effectiveness and suitability of MCS and enforcement related to the

management of bycatch and reduction of discards, or to explicit requirements for MCS and enforcement related to bycatch/discards. There is no evidence provided that the scheme is fully in alignment.

- Some information provided as evidence is irrelevant to the GSSI requirement, making the analysis of the scheme against the requirement difficult to review. For example, the evidence provided for D.1.03 is largely tangential to the GSSI requirement regarding regular meetings of the fishery management organization.
- It appears that compliance was in several cases determined after changes were made to the RFM scheme and new clauses established. It would be helpful to understand what evidence was provided to determine the significance of the changes.
- The report format will make it very difficult to compare results for the different schemes evaluated, and the Executive Summary is largely a list of component numbers that must be cross-referenced with the Benchmark Tool to have any meaning. We suggest full reconsideration of the way the results are communicated so that GSSI does not lead to additional confusion around certification schemes.

The GSSI Code of Conduct states that the program will “work to ensure that decisions and actions are conducted in an objective and transparent way and under scrutiny of stakeholders.” It is our view that the Code has not been adhered to in the preparation of this report. To WWF, this raises questions about the overall credibility and objectivity of the process. If any two external reviewers can come to different conclusions as appears to be the case here, this is going to be a problem for us all.

In this vein, this document is not a comprehensive review of the ASMI scheme against the GSSI requirements due to the different challenges and issues noted above. We would be happy to discuss in more detail if that would be helpful.

We understand that recent improvements have been made by ASMI to their program in order to try to meet the FAO Guidelines. At the same time, we reiterate our previous concerns that the low bar of the GSSI essential components and the lack of clarity from GSSI on what GSSI recognition means risk the program being misused in the marketplace as a tool for identifying schemes that certify sustainable fisheries.

It is important that industry stakeholders know and understand that GSSI recognition means that a scheme simply meets the FAO Guidelines and CCRF, rather than any performance bars for globally accepted best practices for sustainable fishing.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "Alison Cross". The signature is written in a cursive style with a large, sweeping flourish at the end.

Alison Cross, Ph.D.  
Lead, Fishery Certification  
WWF-US