

Wageningen, 12 July 2016

**Subject:** Response to your letter dated 6 April 2016

Dear Randy Ericksen

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). Ocean Outcomes has played a valuable role in the development of the Global Benchmark Tool as part of the Expert Working Group on Fisheries and as an affiliated partner to GSSI.

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 has been published to accompany the spreadsheet. Our factsheet 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).

GSSI's response to Ocean Outcomes comment raised in relation to the GSSI Benchmark conclusions for the Alaska RFM Program is set out below.

**Ocean Outcomes comment:** *We were disappointed to see that numerous requirements and supplementary components were found to be in alignment without evidence that it is being applied appropriately. For example, component D.1.01.02 was found to be in alignment although the committee noted that ASMI will provide further evidence based on the re-certification of the Alaska Salmon Fishery. This fishery has just started the re - certification process so it appears that "evidence" for alignment is not yet available. This seems contrary to basic logic and undermines the credibility of GSSI. We recommend that GSSI withhold recognition of RFM until evidence from the re-certification of the Alaska Salmon Fishery is available.*

**GSSI response:**

GSSI's Benchmark Tool has been developed to benchmark seafood certification schemes and does not evaluate individual fisheries or aquaculture operations since this is the explicit role and responsibility of accredited certification bodies. GSSI approved Independent Experts have benchmarked Alaska Responsible Fisheries Management (RFM) Standard Version 1.3, which is "used for all new fisheries that wish to be certified and for fisheries seeking re-certification to the Alaska RFM program from January 1, 2016." For more information: <http://www.alaskaseafood.org/rfm-certification/fisheries-standard/>

GSSI's Benchmark Process concluded that the Alaska RFM Program, with its Standard V.1.3, has all the appropriate systems in place to assure credible fisheries certification because:

- Alaska RFM Standard V.1.3 was developed in alignment with all applicable GSSI Essential Components for Standard Setting (a functional and robust assurance system in place,

including accreditation and certification to ensure implementation of the standard as the basis for certification)

- Alaska RFM Standard V.1.3 is in alignment with all applicable Essential Components of Section D of the Global Benchmark Tool
- Alaska RFM Program has a plan for implementation of the new Version 1.3 (see below)
- Alaska RFM Program and GSSI's Independent Experts have agreed on monitoring implementation as part of Benchmark Process step 7 "Monitoring of Continued Alignment."

The development of certification schemes is a continuous process and the time to implement changes within a scheme varies significantly depending on the nature of the change. According to GSSI's Benchmark Tool Manual, if a new version of a fishery or aquaculture standard is used for benchmarking "it must be assured that the new version is finalized and approved and will be implemented shortly (shortly: depending on the nature of the change and the normal frequency of implementation of this change). The plan for implementation will be monitored as part of step 7 of the GSSI Benchmark Process, Monitoring of Continued Alignment." As a result, Alaska RFM Program and GSSI's Independent Experts have agreed on the milestones below to show transparency around what is understood as 'shortly.'

AK Salmon Assessment timelines, evidence has been provided for milestones in bold:

- **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**

In view of the above information, the GSSI Benchmark Committee sees no need to delay the recommendation for GSSI recognition of the Alaska RFM Program.

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



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Herman Wisse  
GSSI Program Director



OCEAN OUTCOMES

April 6, 2016

Global Sustainable Seafood Initiative  
Secretariat

*Submitted via email*

**Re: Alaska RFM Benchmark Draft Report Comments**

Dear GSSI Secretariat:

I am submitting comments regarding the GSSI review of ASMI's Responsible Fisheries Management Certification Program (RFM) on behalf of Ocean Outcomes (O2). O2 works with local fishing communities and industry leaders to improve the sustainability of globally significant fisheries and is an affiliated partner with GSSI. As a member of the GSSI Fisheries Expert Working Group, I am pleased to see the first result of the benchmarking process. I am also pleased to see that RFM has made some positive changes to their conformance criteria as evidenced in the report. However, we have some concerns and suggestions for improving the report that I have outlined below.

We found the excel format very difficult to review. While the format makes it easy to sort or filter information, it made it cumbersome to read. We had understood that information would be presented graphically (for example star charts) but did not see any examples of these in the report. We recommend that alternate formats be explored to enhance stakeholder understanding of how schemes conform to GSSI requirements and supplementary components.

We were disappointed to see that numerous requirements and supplementary components were found to be in alignment without evidence that it is being applied appropriately. For example, component D.1.01.02 was found to be in alignment although the committee noted that ASMI will provide further evidence based on the re-certification of the Alaska Salmon Fishery. This fishery has just started the re-certification process so it appears that "evidence" for alignment is not yet available. This seems contrary to basic logic and undermines the credibility of GSSI. We recommend that GSSI withhold recognition of RFM until evidence from the re-certification of the Alaska Salmon Fishery is available.



We appreciate the opportunity to review and comment on the GSSI Benchmarking of RFM. We applaud ASMI for the improvements they have made to their certification program and appreciate the work that GSSI has put into this effort.

Sincerely,

A handwritten signature in blue ink, appearing to read "Randy Ericksen".

Randy Ericksen

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