

Haarlem, 12<sup>th</sup> of December 2019

**Rory Crawford**

Bycatch programme Manager  
BirdLife International Marine Programme  
UK Headquarters  
RSPB Glasgow Office  
10 Park Quadrant  
Glasgow G3 6BS

Subject: Response to the BirdLife International Marine Programme

Dear Rory Crawford,

Many thanks for taking the time to provide your comments on the GSSI Benchmark Report for the Marine Eco-Label Japan (MEL) Program.

GSSI is committed to a transparent benchmark process with opportunity for engagement and comments. Following the consultation, the comments received from BirdLife International Marine Programme and other stakeholders have been carefully reviewed by the Independent Experts, Benchmark Committee and the GSSI Board. Comprehensive responses to each of the comments are provided in this and other letters. After careful deliberations, the Benchmark Committee concluded the comments had been sufficiently addressed and recommends GSSI recognition of the MEL program.

In response to the comments referring to version 1.0 of the MEL Japan Fisheries Management Standard, GSSI explicitly points out that the GSSI benchmarking process and recognition only applies to version 2.0 of the MEL Japan Fisheries Management Standard (2018) and version 1.0 of the MEL Aquaculture Standard (2018). Furthermore, during the transition phase up until January 31 2021, MEL-Japan will be required to clearly differentiate between the different versions of its standard through the logo.

In response to comments concerning the present limited availability of evidence proving implementation of the MEL Japan Fisheries Management Standard v.2.0 (2018), the GSSI requirement of having at least 1 accredited certification in place before being able to achieve recognition is met.

That being said, GSSI requires a stringent monitoring of continued alignment. Under normal circumstances, the Monitoring of Continued Alignment (MOCA) review process is to take place after 1.5 years of recognition. However, in response to the comments received, the GSSI Steering Board has decided that for the case of MEL, this MOCA will be advanced to 1-year post recognition and will comprise of a public consultation to provide stakeholders the opportunity to comment on the new evidence of implementation provided and the continued alignment of the MEL scheme with the GSSI benchmark Tool.

GSSI's detailed responses to your comments by component number raised in relation to the GSSI Benchmark of MEL aquaculture standard are set out below.

The response to each of the comments is structured as follows:

1. Description of the component: Essential or Supplementary and the corresponded numeration
2. Text of the Component
3. Submitted Comment
4. Answer from GSSI
5. Conclusion [old part in black] [new part in blue]
6. References [old part in black] [new part in blue]

The answers to the comments and conclusions of the components make use of the GSSI benchmark language, including the following acronyms:

IE: Independent Expert  
EC: Essential Component  
SC: Supplementary Component  
BC: Benchmark Committee  
MOCA: Monitoring of Continued Alignment

## ■ **Section A – Governance**

### **ESSENTIAL COMPONENT A.1.11**

*The Scheme Owner undertakes a fully documented annual management review of scheme performance, including its assurance program, and the performance of certification and accreditation bodies. The results of the review are used to revise its operating procedures and practices, where necessary.*

#### ■ **BirdLife International Marine Programme comment**

MEL ver. 2.0 only has a short history (became effective in February 2018). Did GSSI have enough information to assess the effectiveness of MEL's internal annual review process to meet the intended purpose? Or is the system in place sufficient to clear this category?

#### ■ **GSSI response**

MEL-J is in alignment with Essential Component A.1.11. Based on the comment of BirdLife International Marine Programme, additional information has been included in the final conclusion.

The performance review of the certification and accreditation bodies has been ongoing and was documented and reviewed by the IE before the public consultation.

MEL-J has conducted their annual scheduled internal management review during the MEL Board of Directors Meeting held on 21st June 2019, (after the 4th MEL General Membership Meeting, on the same day). The management review was the first agenda item. Review of internal documents for evidence of internal management review and consideration for revisions to improve procedures and practices:

Agenda of BOD meeting 21st June 2019.

2. Handout for Management Review, as Proposal 1. , in which 1-4 advisory board seen to be improved as Proposal 2, as well as 2-1. Third bullet point - revision of the regulations also as Proposal 2
3. Advisory Board Establishment Procedure - draft of revision as Proposal 2
4. Logo Regulations -draft of revision as proposal 2
5. Meeting Minutes of the 16th BOD meeting\_190626

In which written, Proposal 1, Management Review result was successfully shared and approved by the BOD. Proposal 2, as the revision of regulations, Advisory Board Procedure and the Logo Regulations were approved by BOD to be improved, implementing the result of the management review is reflected/ addressed to the improvement of MEL scheme. - Proposal 1, Management Review result was successfully shared and approved by the BOD. Proposal 2, as the revision of regulations, Advisory Board Procedure and the Logo Regulations were approved by BOD to be improved, implementing the result of the management review is reflected/ addressed to the improvement of MEL scheme.

GSSI acknowledges the concerns of the commenter and has indicated to the MEL scheme that a MOCA (Monitoring of Continued Alignment) will take place one year following initial final benchmarking determination, in lieu of the usual 1.5 year period. During this MOCA review the MEL scheme will be required to fully and transparently demonstrate continued implementation of all requirements and ensure a consistent application of its standards at fishery level through its audit reports.

## Conclusion on GSSI Essential Component A.1.11

**Conclusion:** MEL is in alignment because it is stipulated in the OMR that “The MEL Council shall undergo an annual management review including of its assurance program to allow for verification of Certification Scheme performance, as well as the performance of AB and CB. The documents of the review shall be reported to the Board of Directors to be used in revising operating procedures and practices as appropriate.”

Detailed Rules of OMR, 3.1 also defines the "Contents of Management Review".

Evidence of implementation include review of internal meeting minutes for Board of Directors including annual report, management evaluation review. Review of Mel progress management file which includes MEL activities for 2019, objectives, timelines and progress. this is used as the end of year business report and management review. Regular meetings have been set up for review of the MEL assurance program with CB and AB evidenced through reviewed meeting minutes and calendar schedule.

For the annual management review, the system is in place and would be considered for follow up in the MOCA. However, since the public consultation, MEL J has conducted their annual scheduled internal management review during the MEL Board of Directors Meeting held on 21st June 2019, (after the 4th MEL General Membership Meeting, on the same day). The management review was the first agenda item. Review of internal documents for evidence of internal management review and consideration for revisions to improve procedures and practices:

Agenda of BOD meeting 21st June 2019.

2. Handout for Management Review, as Proposal 1. , in which 1-4 advisory board seen to be improved as Proposal 2, as well as 2-1. Third bullet point - revision of the regulations also as Proposal 2
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## REFERENCES

1. OMR, 2019, Clause6.4.  
[https://melj.jp/eng/wp-content/uploads/2019/02/Detailed\\_Rules\\_of\\_OMR\\_190207.pdf](https://melj.jp/eng/wp-content/uploads/2019/02/Detailed_Rules_of_OMR_190207.pdf)
2. Detailed Rules of OMR(D-OMR), 2018, clause 2.5  
[https://melj.jp/eng/wp-content/uploads/2019/02/Detailed\\_Rules\\_of\\_OMR\\_190207.pdf](https://melj.jp/eng/wp-content/uploads/2019/02/Detailed_Rules_of_OMR_190207.pdf)

Office Visit/internal review:

3. Annual report 2017 fiscal year
4. Plan of 2018
5. CB management review 7 Jan 2019 meeting minutes (Japanese translated)
6. 190315\_(1st) JAB · JFRCA · MEL meeting minutes\_0321.docx

7. 190328\_MEL top minutes \_improve plan.pdf
8. 190425\_MEL\_JFRCA\_FA (minutes) .docx
9. 第16回理事会次第.doc - 116th Council Document (Japanese - Google translate)
10. マリン・エコラベル・ジャパン協議会マネジメントレビュー\_MEL Council Management review.doc (Japanese - Google translate)
11. MELアドバイザーボード設置要領\_190619 - MEL Advisory Board (Japanese - Google translate)
12. 190621ロゴマーク使用・管理規程\_(理事会配布用)マーカー入り\_0619 - Logo Use/Management Regulations (Japanese - Google translate)
13. 第16回理事会議事録\_送付用\_190626 - Meeting Minutes of the 16th BOD meeting\_190626 (Japanese - Google translate)

## ESSENTIAL COMPONENT A.2.04

*The Scheme Owner or its delegated authority issues written and enforceable authorizations and/or licenses to use the scheme's mark/claim/logo only when the facility and/or product has been certified as being in conformity with the relevant standard.*

### BIRDLIFE INTERNATIONAL MARINE PROGRAMME COMMENT

There is no information available as to how MEL ver2 logo would be distinguished from MEL ver1 logo. If MEL ver. 2 becomes GSSI certified, the two versions clearly need to be differentiated to avoid confusion. If logo of the two versions are the same, either fisheries certified by ver. 1 also would need to meet ver. 2 standard or ver. 2 logo should not mention GSSI.

#### ■ GSSI response

MEL-J is in alignment with Essential Component A.2.04 Based on the comment of BirdLife International Marine Programme, additional information has been included in the final conclusion.

MEL is in alignment with the component and has implemented functional differentiations to the logo mark of V1 and V2 of the program. The actions implemented are:

1. Entities certified under V1 are required to display "V1" below or to the right of the logo mark for the V1 of the Program.
2. Also, display "V2" in the logo mark for the V2 of the Program that is currently being benchmarked.
3. Add a clear explanation on the MEL Website about the V1 & V2 logo differentiation.
4. Ensure V1 of the MEL Program is not in use to certify new fisheries.

Additionally, the transition period from V1 to V2 of the program is very clear: By January 2021 all entities that would want to carry the MEL-Japan logo will have to be certified under Version 2 of the program (currently being benchmarked by GSSI).

## Conclusion on GSSI Essential Component A.2.04

**Conclusion:** MEL is in alignment because in using the MEL logo, the users are required to have contract with the CB. RCB (FMS), RCB (AMS) and RCB (CoC) require the CB to conclude contract with the logo user to ensure that the user will follow the logo policy stipulated in R-LOGO.

The Template for Contract on the Use of Logo is available as Appendix F in the RCB(CoC), Appendix E in the RCB (FMS) and RCB (AMS).

Clause 2.1.2 of the R-LOGO defines the conditions for the logo use.

Review of signed CB Contract Template and Logo Application form includes clauses requiring certification and use limited to the scope of the certification.

As a result of MEL management review (with JFRCA included), MEL decided to improve the Logo management system, by revising of Logo Regulations which contains the Template of the Logo Contract, to be concluded between the certified entity and MEL Council.

IE reviewed the official notice of the change of Logo management system (revision of the Logo regulations, to conclude Logo use contract between entity and MEL). internal document and 201907\_ロゴ契約 (東町漁協)

actual example of Logo use contract between Azuma-cho Fisheries Cooperative Association and MEL Council

Additionally, V2 of the logo mark for fisheries, corresponding to the GSSI benchmarked standard is clearly differentiated from the V1 logo in final products available for consumers.

## REFERENCES

1. R-LOGO, 2018, clause 2.1.2.  
[https://melj.jp/eng/wp-content/uploads/2019/04/Regulations\\_Logo.pdf](https://melj.jp/eng/wp-content/uploads/2019/04/Regulations_Logo.pdf)
2. R-LOGO, 2019, Appendix 2  
[https://melj.jp/eng/wp-content/uploads/2019/09/Regulations\\_Logo.pdf](https://melj.jp/eng/wp-content/uploads/2019/09/Regulations_Logo.pdf)
3. RCB(FMS) ver.2.1, 2019, Clause 5.3.4. , 5.16  
[https://melj.jp/eng/wp-content/uploads/2019/10/RCB\\_FMS\\_ver.2.1.pdf](https://melj.jp/eng/wp-content/uploads/2019/10/RCB_FMS_ver.2.1.pdf)
4. RCB(AMS) ver.1.1, 2019, Clause 5.3.4. , 5.16  
[https://melj.jp/eng/wp-content/uploads/2019/10/RCB\\_AMS\\_ver.1.1.pdf](https://melj.jp/eng/wp-content/uploads/2019/10/RCB_AMS_ver.1.1.pdf)
5. RCB (CoC)ver.2.1, 2019, Clause 5.3.8. , 5.16  
[https://melj.jp/eng/wp-content/uploads/2019/09/RCB\\_CoC\\_ver.2.1.pdf](https://melj.jp/eng/wp-content/uploads/2019/09/RCB_CoC_ver.2.1.pdf)
6. Review contract Tomokomai Fisheries dated 5 Sept 2018 including Logo Mark Usage template completed and signed (Japanese translated)
7. Review audit checklist assessment report

## ■ Section B – Operational Management

### ESSENTIAL COMPONENT B.1.09

*The Scheme Owner ensures that the accreditation process includes a review of the performance of certification bodies and auditors in the field.*

#### ■ BirdLife International Marine Programme comment

There are discrepancies as to when one fishery and one aquaculture farm were MEL ver. 2.0 certified, between statements in reports and MEL News on its website. According to reports produced by JFRCA, MEL ver. 2.0

certification became effective for yellowtail aquaculture in Kagoshima and chum salmon set-net fishery in Hokkaido on February 28, 2019. However, MEL News from December 2018 (available in Japanese on MEL website) mentions that the former was certified on November 22, 2018 and the latter on December 10, 2018. Both of them were well before JFRCA became accredited on March 28, 2019 by JAB. Has GSSI looked into a possibility that dates stated in the reports have been falsified by MEL and/or JFRCA?

#### ▪ **GSSI response**

MEL-J is in alignment with Essential Component B.1.09. Based on the comment of BirdLife International Marine Programme, additional information has been included in the final conclusion.

GSSI recognizes the concerns raised by the commenter on the reports' dates. The actual on-site audit was conducted on Feb 16-18, 2018 for Hokkaido and March 22nd, 2018 for Azuma-cho. These were performed using checklists that were not aligned with GSSI components at the time. Subsequently, these checklists were adapted and approved by the MEL technical committee Jan 23rd, 2019 and announced in February 2019. The audit reports from the Feb Hokkaido and March Asuma-cho 2018 site visits were retroactively revised by the auditor using the new GSSI aligned checklists. The two revised audit reports were used to verify alignment with Sections C and D. The new revision did not include a new site visit.

However, these audit reports and site visits noted in the comments were not the site visits of the accreditation site audit, that are part of the component B.1.09, which focusses on the accreditation audit including field visits.

The witness audits were done according to the procedures of JAB using Dec 2018 versions of the FMS and AMS checklists that were considered in alignment after meeting with the IEs C and D. The subsequent final approved version of IOC V2.1 FMS and 1.1 AMS by the MEL technical committee on January 23rd, 2019 was reviewed by JAB to compare the two versions. The conclusion by JAB was that the difference between the version used in the witness audit (Dec 2018) and final approved version (Jan 23rd, 2019) did not constitute a risk.

Witness audits included:

Chuo Fish Co., Ltd. 16 Jan 2019

[http://www.fish-jfrca.jp/04/pdf/mel/CoC\\_JFRCA20C3600011.pdf](http://www.fish-jfrca.jp/04/pdf/mel/CoC_JFRCA20C3600011.pdf)

Yongkyu Corporation AMS 18 January 2019 [http://www.fish-jfrca.jp/04/pdf/mel/farmed\\_fisheries\\_JFRCA10A7500011.pdf](http://www.fish-jfrca.jp/04/pdf/mel/farmed_fisheries_JFRCA10A7500011.pdf)

Yui-port fisheries cooperative association 11 Jan 2019. FMS. Since the status of shrimp resource shows fluctuation in spite of the most advanced resource management system, this is the very controversial fishery among fishers and scientists in Japan today. Thus, JFRCA has being carefully reviewed the report before they make final decision on the certification. According to JFRCA, the additional information was almost collected, and they will make a final decision within one month.

In essence, the audits Hokkaido and Azuma-cho were done before JFRCA was accredited, but were not part of the accreditation audit. Additionally, after the Public Consultation MEL J submitted to GSSI the Annual surveillance audit for Azuma-cho Fishery Cooperative Association CoC and AMS Association Hokkaido Federation of Fisheries Cooperative FMS as for Sept and August 2019 respectively, within the time period as prescribed in the MEL procedures. This Surveillance reports were conducted using the new adapted checklist and included on-site visits.

#### **Conclusion on GSSI Essential Component B.1.09**

**Conclusion:** MEL is in alignment because as a member of IAF, the inclusion of an office audit is part of the standard approach for the JAB accreditation process.

Further, contract between MEL and JAB article 7 stipulates that the AB shall conduct an accreditation of MEL certification body in accordance with ISO/IEC 17011: 2004 (clause 7.7) which requires an on-site assessment which includes an office audit and a field audit.

Review of accreditation application including office audit and site visit FMS Jan 11, 2019, AMS Jan 18th, 2019 and CoC Jan 16, 2019 documents. Acceptance of JFRCA for product certification of MEL standard 10 Oct 2018. Three of witness audits were completed by middle of January 2019, as well as JFRCA office visit by JAB in December 2018. JFRCA accredited March 28, 2019.

The witness audits were done according to the procedures of JAB using Dec 2018 versions of the FMS and AMS checklists that were considered in alignment after meeting with the IEs C and D. The subsequent final approved version of IOC V2.1 FMS and 1.1 AMS by the MEL technical committee on January 23rd, 2019 was reviewed by JAB to compare the 2 versions. The conclusion by JAB was that the difference between the version used in the witness audit (Dec 2018) and final approved version (Jan 23rd, 2019) were "negligible, so I think the certification risk arising from the difference can be almost ignored" email communication JAB, Mr Horie (May 2019).

Witness audits included:

Chuo Fish Co., Ltd. 16 Jan 2019

[http://www.fish-jfrca.jp/04/pdf/mel/CoC\\_JFRCA20C3600011.pdf](http://www.fish-jfrca.jp/04/pdf/mel/CoC_JFRCA20C3600011.pdf)

Yongkyu Corporation AMS 18 January, 2019 [http://www.fish-jfrca.jp/04/pdf/mel/farmed\\_fisheries\\_JFRCA10A7500011.pdf](http://www.fish-jfrca.jp/04/pdf/mel/farmed_fisheries_JFRCA10A7500011.pdf)

Yui-port fisheries cooperative association 11 Jan 2019. FMS. Since the status of shrimp resource shows fluctuation in spite of the most advanced resource management system, this is the very controversial fishery among fishers and scientists in Japan today. Thus, JFRCA has been carefully reviewed the report before they make final decision on the certification. According to JFRCA, the additional information was almost collected, and they will make a final decision within one month.

## REFERENCES

1. OMR, rev 7 Feb 2019, Clause 6.2.1.  
[https://melj.jp/eng/wp-content/uploads/2019/02/OMR\\_190207.pdf](https://melj.jp/eng/wp-content/uploads/2019/02/OMR_190207.pdf)
2. IAF Website: [http://www.iaf.nu/articles/IAF\\_MEM\\_Japan/85](http://www.iaf.nu/articles/IAF_MEM_Japan/85)
3. JAB website:  
Accreditation procedure: <https://www.jab.or.jp/service/product/step/> (Japanese)

Office Visit:

4. Accreditation project management documents including desk based and office visits (confidential) Japanese translated
5. Contract between MEL and Japan Accreditation Board (JAB), Oct 13th, 2017 (confidential) Japanese translated
6. Contract between MEL and JFRCA, 2018 (confidential) Japanese translated
7. JAB\_schedule for JFRCA\_20190322 (Japanese).pdf
8. JFRCA Accreditation Certificate PO170
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[http://www.fish-jfrca.jp/04/pdf/mel/CoC\\_JFRCA20C3600011.pdf](http://www.fish-jfrca.jp/04/pdf/mel/CoC_JFRCA20C3600011.pdf)
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[http://www.fish-jfrca.jp/04/pdf/mel/farmed\\_fisheries\\_JFRCA10A7500011.pdf](http://www.fish-jfrca.jp/04/pdf/mel/farmed_fisheries_JFRCA10A7500011.pdf)
11. Timetable

## ESSENTIAL COMPONENT B.2.04

*The Scheme Owner requires that certification bodies carry out periodic surveillance and monitoring at sufficiently close intervals to verify that certified operations continue to comply with the certification requirements. For aquaculture operations, this should be on an annual basis.*

### ▪ **BirdLife International Marine Programme comment**

Does MEL/JFRCA have any intention to make audit reports of MEL ver 2.0 readily available for transparency? Audit reports of 25 of 50 fisheries certified by MEL ver 1.0 are not available on JFRCA website. 20 of the 25 have been certified for more than one year.

### ▪ **GSSI response**

MEL-J is in alignment with Essential Component B.2.04. Based on the comment of BirdLife International Marine Programme, additional information has been included in the final conclusion.

GSSI recognizes the concerns raised by the commenter. The scope of the GSSI review does not include the MEL FM Ver.1.0.

Regarding the delay in publication of the audit reports, JFRCA has measures to prevent recurrence and to make public reports part of the requirements for certification. Administrative procedure ensures that Certification shall not take effect until the report is ready to be made public. Updated JFRCA administrative procedure referenced

The vast majority of the new MEL Ver.2.0 are now available with a note to request those which are not yet publicly available. This area has been flagged for MOCA to ensure audit reports are up to date or a clear rationale why not.

### **Conclusion on GSSI Essential Component B.2.04**

**Conclusion:** MEL is in alignment because the RCB stipulates annual audits for FMS (18 months) and AMS (12 months)

Review of copies of new certificate one each for FMS, AMS and CoC in Japanese (rough Google Translate) confirming renewal dates. JFRCA website of certified entities(NEW MEL=FMS ver.2.0, AMS, and CoC Ver.2.0) shows also the validity date (and due for the next annual audit).

Review sample management sheet of JFRCA to manage/ inform certified entity of annual audit due.

[Annual surveillance audit for Azuma-cho Fishery Cooperative Association CoC and AMS Association Hokkaido Federation of Fisheries Cooperative FMS](#) are for Sept and August 2019 respectively - within the time period as prescribed in the MEL procedures. A full review of the reports, NCs and Corrective Action timelines (B.2.10 and B.2.16) will take place with the MOCA.

### **REFERENCES**

1. RCB (FMS) ver.2.1, 2019, Clause 5.10.1  
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2. RCB (AMS) ver.2.1, 2019 Clause 5.10.1  
[https://melj.jp/eng/wp-content/uploads/2019/10/RCB\\_AMS\\_ver.1.1.pdf](https://melj.jp/eng/wp-content/uploads/2019/10/RCB_AMS_ver.1.1.pdf)
3. RCB(CoC) ver.2.1, 2019, Clause 5.10.1, Appendix C  
[https://melj.jp/eng/wp-content/uploads/2019/09/RCB\\_CoC\\_ver.2.1.pdf](https://melj.jp/eng/wp-content/uploads/2019/09/RCB_CoC_ver.2.1.pdf)
4. [http://www.fish-jfrca.jp/04/progress\\_and\\_results.html#mel\\_capture\\_fisheries\\_ver2](http://www.fish-jfrca.jp/04/progress_and_results.html#mel_capture_fisheries_ver2)



Internal review/certificates:

5. JFRCA\_F – 1 .management sheet (Azuma-cho AMS) .pdf
6. Certificate\_FMS ver.2.0\_Hokkaido\_0306.pdf
7. Certificate\_AMS\_ver.1.0\_Azumacho\_0306.pdf
8. Certificate\_CoC ver.2.0\_Azumacho\_0306.pdf
  
9. Azuma-cho Fishery Cooperative Association JFRCA Assessment plan dated 1 September 2019
10. Marine Eco-Label Japan Fisheries Management Certification First Annual Surveillance Report. Hokkaido Federation of Fisheries Cooperative Association Chum Salmon Set-net Fishery Certification No.: JFRCA 20F2200011 Date certified: February 28, 2019. August 2019. On site assessment July 21, 2019.

## ESSENTIAL COMPONENT B.2.05

*The Scheme Owner ensures that certification bodies apply a consistent methodology to assess compliance with the standard.*

### ▪ **BirdLife International Marine Programme comment**

Does MEL ver 2.0 have a long enough history for evaluation of whether it has a consistent methodology to assess compliance with the standard?

### ▪ **GSSI response**

MEL-J is in alignment with Essential Component B.2.05. Based on the comment of BirdLife International Marine Programme, additional information has been included in the final conclusion.

GSSI recognizes the concerns raised by the commenter on the short history of MEL Ver.2.0. However, MEL-Japan does meet the GSSI requirement of having at least 1 accredited certification in place before being able to achieve recognition.

For the evaluation of the MEL program, a randomly selected sample of audit reports were reviewed. A review of audit reports was done prior to the public consultation to ensure a consistent methodology. In addition, the GSSI IE reviewed a sample of audit plans and auditor qualifications/competence for those audits.

To ensure consistency in the methodology, this will be reviewed with additional reports as part of the MOCA.

Additionally, Azuma-cho Fishery Cooperative Association CoC and AMS Annual Surveillance plan was reviewed (Sept 19th, 2019). Association Hokkaido Federation of Fisheries Cooperative FMS surveillance audit was conducted 21st July 2019, with the full audit report provided dated August 2019. Both reports used the guidelines consistently but a full review of the reports, NCs and Corrective Action timelines (B.2.10 and B.2.16) will take place with the MOCA.

## Conclusion on GSSI Essential Component B.2.05

**Conclusion:** MEL is in alignment because the methodologies to be used to assess compliance with the FMS/ AMS are described in both “Guidelines for Auditors” and “Checklist for Auditors” of each standard which are all freely available on the website.

Review of CB JFRCA regulations, guidance and training records.

Annual management review of CBs (OMR 6.4)

Review of sample of audit reports

[Review of audit plans and auditor qualification/competence sheets.](#)

[Azuma-cho Fishery Cooperative Association CoC and AMS Annual Surveillance plan was reviewed \(Sept 19th, 2019\). Association Hokkaido Federation of Fisheries Cooperative FMS surveillance audit was conducted 21st July 2019, with the full audit report provided dated August 2019. Both reports used the guidelines consistently but a full review of the reports, NCs and Corrective Action timelines \(B.2.10 and B.2.16\) will take place with the MOCA.](#)

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2. RCB (AMS) ver.1.1, 2019, 4 (Resource Requirements)  
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5. Guidelines for Auditors of AMS, 2019  
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6. Checklist for Auditors of AMS, 2019  
<https://melj.jp/eng/wp-content/uploads/2019/04/Checklist-for-Auditors-of-the-Aquaculture-Management-Standard.pdf>
7. Guidelines for Auditors of CoC, 2018
8. Checklist for Auditors of CoCS, 2018 (not on the website)

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10. Audit reports confidential (Japanese google translate)
11. Chubu Suisan (CoC) report 11.pdf
12. Chuo Gyorui (CoC) report 6.pdf
13. Fukushima (FMS) report 15.pdf
14. Yonkyu Ohita (AMS) report 3.pdf
15. Yumigahama (AMS) report 7.pdf
16. 審査計画書 (東町) =Audit Plan (Azuma-cho)
17. 審査計画書 (北海道) =Audit Plan(H o k k a i d o)
18. 審査員資格・力量管理シート(井上)=Auditor qualification/competence management sheet

19. 審査員資格・力量管理シート(岩田)=Auditor qualification/competence management sheet

20. Azuma-cho Fishery Cooperative Association JFRCA Assessment plan dated 1 September 2019

21. Marine Eco-Label Japan Fisheries Management Certification First Annual Surveillance Report. Hokkaido Federation of Fisheries Cooperative Association Chum Salmon Set-net Fishery Certification No.: JFRCA 20F2200011 Date certified: February 28, 2019. August 2019. On site assessment July 21, 2019.

## ESSENTIAL COMPONENT B.2.09

*The Scheme Owner requires that certification bodies have in place consistent procedures for stakeholders to provide input during the certification process.*

### ▪ BirdLife International Marine Programme comment

Does MEL/JFRCA have a plan to hold public consultation period for draft audit reports for MEL ver 2.0 certification? Stakeholders' inputs would be more meaningful for draft audit reports than for audit applications, offering the opportunity for proper engagement with the proposed scoring by the CB.

### ▪ GSSI response

MEL-J is in alignment with Essential Component B.2.09. Based on the comment of BirdLife International Marine Programme, additional information has been included in the final conclusion.

GSSI recognizes the concerns raised by the commenter. Although GSSI has recommended a plan for a public consultation on draft audit report, the procedure of holding a public consultation for draft audit reports is not required to be in alignment with this Essential Component.

## Conclusion on GSSI Essential Component B.2.09

**Conclusion:** MEL is in alignment because the RCB (FMS)/ RCB (AMS) requires that the CB at the time of receipt of audit application, make a public announcement and have a consistent system in place by which interested stakeholders can provide input.

JFRCA has in place consistent procedure publicly announces applications for certification with the opportunity for public input during the certification process. Review for sample of audit reports (#6,7,11,15) on JFRCA website with public announcements.

In the JFRCA Certification operation regulation, section 5.3.6, it is stipulated that 1) the acceptance of certification application shall be announced, 2) consistent system shall be in place for interested parties to provide input. And the stakeholder input is available by email. The method is assessed and approved in conformity by JAB.

## REFERENCES

1. RCB (FMS) ver.2.1, 2019, Clause 5.3.5.  
[https://melj.jp/eng/wp-content/uploads/2019/10/RCB\\_FMS\\_ver.2.1.pdf](https://melj.jp/eng/wp-content/uploads/2019/10/RCB_FMS_ver.2.1.pdf)
2. RCB (AMS), ver.1.1, 2019, Clause 5.3.5.  
[https://melj.jp/eng/wp-content/uploads/2019/10/RCB\\_AMS\\_ver.1.1.pdf](https://melj.jp/eng/wp-content/uploads/2019/10/RCB_AMS_ver.1.1.pdf)
3. JFRCA website (Japanese Google translate). accessed 22 Oct 2018.

- [http://www.fish-jfrca.jp/04/progress\\_and\\_results.html#mel\\_capture\\_fisheries\\_ver2](http://www.fish-jfrca.jp/04/progress_and_results.html#mel_capture_fisheries_ver2)
4. Screen shot public consultation Application for Hokkaido Fisheries Cooperative Federation Aug 27, 2018
  5. Screen shot public announcement (Japanese Google translate) accessed 14 May 2019  
[http://www.fish-jfrca.jp/04/progress\\_and\\_results.html](http://www.fish-jfrca.jp/04/progress_and_results.html) - Chuo CoC (2018/3/20), Yumigahama AMS 2018/5/8, Chubu CoC 2018/8/10, Fukushima FMS 2018/12/24
  6. 株式会社兵殖Hyoshoku Co., Ltd. (<http://hyoshoku.com/>)  
2019/2/1 certification application was accepted and disclosed on JFRCA website:  
[http://www.fish-jfrca.jp/04/shinsei/shinsei\\_hyoshoku.html](http://www.fish-jfrca.jp/04/shinsei/shinsei_hyoshoku.html)
  7. \*in the announcement
    3. 意見提出要領  
上記申請に関連し、当協会が考慮すべきであるとする事項について、簡潔な文、又は箇条書きで、意見及び提供可能な場合にはその裏づけとなる具体的な事実をお知らせ下さい。  
(意見送付先) [mel-jfrca@mbr.sphere.ne.jp](mailto:mel-jfrca@mbr.sphere.ne.jp)
    3. Opinion submission guidelines  
Related to the application above, on what you think JFRCA should consider, please provide opinions, with brief statement or list of opinions, and if available, specific facts supporting it.  
(to submit) [mel-jfrca@mbr.sphere.ne.jp](mailto:mel-jfrca@mbr.sphere.ne.jp)
  8. Aquaculture and CoC Certifications to Hyoshoku. Co. Ltd. effective on 2019/07/26 (JFRCA10A7500021), (JFRCA20C7500011)  
[http://www.fish-jfrca.jp/04/progress\\_and\\_results.html](http://www.fish-jfrca.jp/04/progress_and_results.html)

## ESSENTIAL COMPONENT B.2.13

*For fisheries, the Scheme Owner requires certification bodies to make full audit reports available on request after certification has been granted, while excluding commercially sensitive information.*

### ■ BirdLife International Marine Programme comment

Does MEL/JFRCA have any intention to make audit reports of MEL ver. 2.0 readily available for transparency? Audit reports of 25 of 50 fisheries certified by MEL ver. 1.0 are not available on JFRCA website. 20 of the 25 reports have been certified for more than one year.

### ■ GSSI response

MEL-J is in alignment with Essential Component B.2.13. Based on the comment of BirdLife International Marine Programme, additional information has been included in the final conclusion.

GSSI recognizes the concerns the concerns raised by BirdLife International Marine Programme. Yet, the scope of the GSSI review does not include the MEL FM Ver.1.0 and there appears to be no attempt to publish older reports on the JFRCA website, as noted by the commenter, many are absent. The vast majority of the MEL Ver.2.0 are now available, with a note to request those which are not yet publicly available. This area has been flagged for MOCA to ensure audit reports are up to date or a clear rationale why not.

Regarding the delay in publication of the audit reports, JFRCA has measures to prevent recurrence and to make public reports part of the requirements for certification. Administrative procedure ensures that certification shall not take effect until the report is ready to be made public.

Updated JFRCA administrative procedure referenced:

S-7 is 認証判定書 “decision making on Certification”

申請者が同意した公開用の報告書が用意され、認証発効時に公開できる。A report for publication that the applicant has agreed to is prepared and can be published when the certification comes into effect.

(google translate)

and put in their procedure.

F-1 認証管理シート “certification management sheet”

the certification comes into effect when the assessment report is made public on the website.

### Conclusion on GSSI Essential Component B.2.13

**Conclusion:** MEL is in alignment because the RCB (FMS) clause 5.9.1. defines that “The Certification Body shall disclose the status of certification and a summary of the audit report by electronic medium. The Certification Body shall, based upon an agreement with the applicant, disclose to the public the whole text of audit reports by electronic medium or at the request of a third party.”  
Commercially sensitive matters are excluded as stated in the RCB(FMS) 5.3.3.

There is a listing of certified entities with links to all reports. In the case that reports have not been finalized in terms of removing commercially sensitive information with the certified entity, there is the possibility to request the report once it becomes available. Google translated “when you click the certification number, the examination report will be displayed. In the examination report, the information corresponding to the following cannot be disclosed and is blackened.

- Commercially sensitive contents (Requirements for certification body 5.3.3 (fishing, aquaculture), 5.3.5 (CoC))
- Information that can lead to pressure that impairs the fairness of certification activities (ISO / IEC17065 4.2.2). While some certification reports have not been released during confirmation of relevant information with certification holders, they will be released one by one as soon as the confirmation is obtained. For requests for unpublished reports, please contact the secretariat (mel-jfrca@mbr.sphere.ne.jp). As soon as ready, we will contact you.”

JFRCA client contract template for all standards Article 2.2 Disclosure notes that upon acceptance, the client's application will be announced publicly and 2.3 upon certification - reports shall be made public without commercially sensitive information.

Regarding the delay in publication of the audit reports, JFRCA has measures to prevent recurrence and to make public reports part of the requirements for certification. Administrative procedure ensures that Certification shall not take effect until the report is ready to be made public.  
updated JFRCA administrative procedure referenced

S-7 is 認証判定書 "decision making on Certification"

申請者が同意した公開用の報告書が用意され、認証発効時に公開できる。A report for publication that the applicant has agreed to is prepared and can be published when the certification comes into effect.  
(google translate)

and put in their procedure.

F-1 認証管理シート “certification management sheet”

the certification comes into effect when the assessment report is made public on the website.

### REFERENCES

1. RCB (FMS) ver.2.1, 2019, Clause 5.9.1 and 5.3.3.  
[https://melj.jp/eng/wp-content/uploads/2019/10/RCB\\_FMS\\_ver.2.1.pdf](https://melj.jp/eng/wp-content/uploads/2019/10/RCB_FMS_ver.2.1.pdf)

2. [http://www.fish-jfrca.jp/04/progress\\_and\\_results.html](http://www.fish-jfrca.jp/04/progress_and_results.html) accessed 19 June 2019

Office Visit:

3. Review template and actual signed contract with clients Information Disclosure clauses 2.1-2.3 (Japanese translated)

Internal JFRCA documents:

4. JFRCA\_様式 F – 1 .Rev2 認証管理シート (改) .docx
5. JFRCA\_様式 S – 7 .Rev1 認証判定決定書 (改) .docx

## ■ Section D – Fisheries

### ESSENTIAL COMPONENT D.5.06

*The standard requires an assessment of the extent to which non-target catches and discards by the unit of certification of stocks other than the stock under consideration and any associated culture and enhancement activities threaten those non-target stocks with recruitment overfishing or other impacts that are likely to be irreversible or very slowly reversible.*

#### ■ BirdLife International Marine Programme comment

There appears to be insufficient information for GSSI to properly evaluate whether the requirements of MEL actually mean that sufficiently independent, rigorous data are required for risk assessment and risk management for bycatch of non-fish species. For example, in the referenced report (chum salmon set-net fishery in Hokkaido) there is no mention of seabirds under "Non-target catches and discards" section. The coastal areas of Hokkaido are major seabird habitats in Japan, and diving seabirds are potentially susceptible to bycatch in the salmon set-net fishery in the areas (and at the times) this fishery operates. Spatial and temporal overlap between seabirds (and other wildlife) and fisheries, and potential risks of fishing gear and methods (e.g. mesh size of set-net) to seabirds and other non-target species should be thoroughly evaluated and clearly described. Limited data and reports on bycatch in certain fisheries in Japan does not necessarily mean there is no possibility of bycatch - often this is based on self-reported data rather than that recorded by independent observers, and has high potential for inherent biases, as well demonstrated in the peer-reviewed literature. Evaluation of independent data that can be objectively verified is therefore the only truly 'reliable' source (as per GSSI requirements) and certification schemes need to ensure that such data are collected reliably where there is risk for particular species in particular gear types.

#### ■ GSSI response

MEL-J is in alignment with Essential Component D.5.06. Based on the comment of BirdLife International Marine Programme, no additional information has been included in the final conclusion.

The expressed concerns refer to the scientific quality of the assessment report that has been provided as evidence of implementation of the MEL scheme standard by the CAB, JFRCA. GSSI recognizes the concerns raised by the BirdLife International Marine Programme. Following careful consideration by the GSSI Benchmark Committee, GSSI has recommended a MOCA review at the one year anniversary of Benchmark recognition of MEL. During this MOCA review the MEL scheme will be required to fully and transparently demonstrate continued implementation of all requirements and ensure a consistent application of its standards at fishery level through its audit reports.

## Conclusion on GSSI Essential Component D.5.06

**Conclusion:** MEL is in alignment because requirement(s) in the Fisheries Management Standard (version 2.0) and indicator(s) in the Fisheries Management Standard: Guidelines for Auditors – Indicators of Conformity – (version 2.1) state as follows;

Requirement 3.1.1 in the Fisheries Management Standard (version 2.0)

Data and/or other information based on the best scientific evidence available covering the following factors shall be collected and maintained in order to assess the impacts of the unit of certification on non-target stocks and ecosystem:

- (1) Catches and discard of non-target stocks
- (2) Impacts of the unit of certification on endangered species, and efforts to conserve and protect those species as well as to avoid by-catch of those species
- (3) Information on the essential habitat for stock under consideration (e.g. spawning and nursery sites)
- (4) Impacts of fishing gear used by the unit of certification on ecosystem (including the seabed)
- (5) Prey-predator relationship of the stock under consideration in the food-web
- (6) Balance of whole ecosystem (i.e. whether there is any severe disturbance by the unit of certification on ecosystem)

Indicator(s) 3.1.1 (a) (1) in the Fisheries Management Standard: Guidelines for Auditors – Indicators of Conformity – (version 2.1)

(a) Whether adequate, reliable and current data and/or other information of followings exist:

(1) Assessment of the extent to which non-target catches and discards by the unit of certification of stocks other than the stock under consideration threaten those non-target stocks with recruitment overfishing or other impacts that are likely to be irreversible or very slowly reversible with appropriate related data/information.

•Existence of collected and maintained information referred in (1) – (5) above.

Standard 3.2 particularly requires the consideration of ecosystem in the associated fish farming and resource enhancement.

Requirement 3.2.3 in the Fisheries Management Standard (version 2.0)

(In case of the associated fish farming and resource enhancement,) There shall be continuous monitoring of the state of the stock under consideration and its habitat, and measures shall be implemented in order to avoid significant adverse impacts of enhancement activities on the natural reproductive stock components of the stock under consideration and ecosystem.

Indicator(s) 3.2.3 (b) (1) in the Fisheries Management Standard: Guidelines for Auditors – Indicators of Conformity – (version 2.1)

(b) Whether following information about the impacts of release of artificial seedling on other species and the ecosystem exists:

(1) Assessment of the extent to which non-target catches and discards by associated culture and enhancement activities threaten those non-target stocks with recruitment overfishing or other impacts that are likely to be irreversible or very slowly reversible.

•Existence of information about impacts on other species and the ecosystem referred in (1) - (4) above.

•Existence of information about the distributional area of seedling and growth after the seedling is released, including information to confirm that the natural reproductive stock component of enhanced stocks is not substantially displaced by stocked components.

Additional information for the above requirement(s) and indicator(s) can be found in the Fisheries Management Standard: Guidelines for Auditors – Indicators of Conformity – (version 2.1):

Requirements 3.1.1 and 3.2.3; Indicators 3.1.1 (a) (1). p. 37-40. and 3.2.3 (b) (1). p. 53-56.

Examples of the requirement(s) in use can be found in the Assessment Report Fisheries Management

Standard (Salmon, Hokkaido): Summary Evidence and Evidence 3.1.1 (a). p. 76-81. and 3.2.3 (b). p. 102-103.

## REFERENCES

1. Fisheries Management Standard (version 2.0), 2018: Requirement(s) 3.1.1. p. 8 and 3.2.3. p. 9. <https://melj.jp/eng/wp-content/uploads/2019/04/Fisheries-Management-StandardFMSver.2.0.pdf>
2. Fisheries Management Standard: Guidelines for Auditors – Indicators of Conformity – (version 2.1), 2019: Indicator(s) 3.1.1 (a) (1). p. 37-40 and 3.2.3 (b) (1) p. 53-56. <https://melj.jp/eng/wp-content/uploads/2019/04/Fisheries-Management-Standard-Guidelines-for-Auditors-Indicators-of-Conformity-Version.-2.1.pdf>
3. Assessment Report Fisheries Management Standard (Salmon, Hokkaido), 2019: Summary Evidence and Evidence 3.1.1 (a). p. 76-81 and 3.2.3 (b). p. 102-103.
4. [First Annual Surveillance Report. Hokkaido Federation of Fisheries Cooperative Association Chum Salmon Set-net Fishery Certification No.: JFRCA 20F2200011 Date certified: February 28, 2019. Report Prepared: August 2019. On site assessment July 21, 2019.](#)

## ESSENTIAL COMPONENT D.5.10

*The standard requires an assessment of the impacts of the unit of certification, including any associated enhancement activities where applicable, on endangered species.*

### ■ BirdLife International Marine Programme comment

It is unclear how GSSI was able to evaluate 1) MEL's intention and capability to properly assess the impact of the unit of certification on endangered species and 2) the data required by MEL is reliable (i.e. that it can be objectively verified - collected by an observer or through electronic monitoring), as there have been only two MEL ver. 2.0 certified fisheries and an audit report from only one of them is currently available. Is there enough evidence that independent data collected either by trained observers or electronic monitoring are/were available for MEL to evaluate whether CBs take a true risk assessment and risk management approach? Those seabirds potentially susceptible in salmon set-net fishery mentioned in D.5.06 include species such as Common Murre, Spectacled Guillemot, Tufted Puffin, Ancient Murrelet, and Red-faced Cormorant, all listed in Red Data Books published by Japan Ministry of the Environment and Hokkaido Government. Seabirds are not mentioned in the "Endangered species" section of the reference report, MEL certified chum salmon set-net fishery in Hokkaido. Whether endangered seabird bycatch in the chum salmon set-net fishery was properly evaluated is therefore highly questionable.

### ■ GSSI response

MEL-J is in alignment with Essential Component D.5.10. Based on the comment of BirdLife International Marine Programme, no additional information has been included in the final conclusion.

GSSI recognizes the concerns raised by the BirdLife International Marine Program. As the comment addresses two concerns, these are responded separately.)

The first concern relates to the scientific quality of the Hokkaido chum salmon set net fishery assessment report that has been provided as evidence of implementation of the MEL scheme standard by the Conformity Assessment Body (JFRCA). This concern includes the analysis of non-fish interactions, particularly with sea birds. This issue has been considered by the GSSI Benchmark Committee, which has consequently recommended a MOCA review at the one year anniversary of Benchmark recognition of MEL. This comprehensive review will include several assessment and audit reports as evidence of implementation of the GSSI ECs, as well as a detailed review of process requirements from sections A and B. This will assure continuous alignment with D.5.06.



The second concern discusses the second fishery certified by MEL under Ver.2.0. The assessment report for that fishery was not included in the MEL benchmark application as it was not available at the time of the application. However, this assessment report will be reviewed by GSSI at the time of the MOCA review referred to previously.

### **Conclusion on GSSI Essential Component D.5.10**

**Conclusion:** is in alignment because requirement(s) in the Fisheries Management Standard (version 2.0) and indicator(s) in the Fisheries Management Standard: Guidelines for Auditors – Indicators of Conformity – (version 2.1) state as follows;

Requirement 3.1.1 in the Fisheries Management Standard (version 2.0)

Data and/or other information based on the best scientific evidence available covering the following factors shall be collected and maintained in order to assess the impacts of the unit of certification on non-target stocks and ecosystem:

- (1) Catches and discard of non-target stocks
- (2) Impacts of the unit of certification on endangered species, and efforts to conserve and protect those species as well as to avoid by-catch of those species
- (3) Information on the essential habitat for stock under consideration (e.g. spawning and nursery sites)
- (4) Impacts of fishing gear used by the unit of certification on ecosystem (including the seabed)
- (5) Prey-predator relationship of the stock under consideration in the food-web
- (6) Balance of whole ecosystem (i.e. whether there is any severe disturbance by the unit of certification on ecosystem)

Indicator(s) 3.1.1 (a) (2) in the Fisheries Management Standard: Guidelines for Auditors – Indicators of Conformity – (version 2.1)

- (a) Whether adequate, reliable and current data and/or other information of followings exist:
- (2) Assessment of the impacts of the unit of certification on endangered species with appropriate related data/information collected in accordance with applicable international standards and practices.
  - Existence of collected and maintained information referred in (1) – (5) above.

Standard 3.2 particularly requires the consideration of ecosystem in the associated fish farming and resource enhancement.

Requirement 3.2.3 in the Fisheries Management Standard (version 2.0)

(In case of the associated fish farming and resource enhancement,) There shall be continuous monitoring of the state of the stock under consideration and its habitat, and measures shall be implemented in order to avoid significant adverse impacts of enhancement activities on the natural reproductive stock components of the stock under consideration and ecosystem.

Indicator(s) 3.2.3 (b) (2) in the Fisheries Management Standard: Guidelines for Auditors – Indicators of Conformity – (version 2.1)

- (b) Whether following information about the impacts of release of artificial seedling on other species and the ecosystem exists:
  - (2) Assessment of the impacts of associated culture and enhancement activities on endangered species with appropriate related data/information collected in accordance with applicable international standards and practices.
    - Existence of information about the distributional area of seedling and growth after the seedling is released, including information to confirm that the natural reproductive stock component of enhanced stocks is not substantially displaced by stocked components.
    - Existence of information about impacts on other species and the ecosystem referred in (1) - (4) above.

Additional information for the above requirement(s) and indicator(s) can be found in the Fisheries Management Standard: Guidelines for Auditors – Indicators of Conformity – (version 2.1): Requirements 3.1.1, 3.2.3; Indicators 3.1.1 (a) (2). p. 37-40. and 3.2.3 (b) (2). p. 53-56.

Examples of the requirement(s) in use can be found in the Assessment Report Fisheries Management Standard (Salmon, Hokkaido): Summary Evidence and Evidence 3.1.1 (a). p. 76-81. and 3.2.3 (b). p. 102-103.

## REFERENCES

1. Fisheries Management Standard (version 2.0), 2018: Requirement(s) 3.1.1. p. 8 and 3.2.3. p. 9.  
<https://melj.jp/eng/wp-content/uploads/2019/04/Fisheries-Management-StandardFMSver.2.0.pdf>
2. Fisheries Management Standard: Guidelines for Auditors – Indicators of Conformity – (version 2.1), 2019: Indicator(s) 3.1.1 (a) (2). p. 37-40 and 3.2.3 (b) (2). p. 53-56.  
<https://melj.jp/eng/wp-content/uploads/2019/04/Fisheries-Management-Standard-Guidelines-for-Auditors-Indicators-of-Conformity-Version.-2.1.pdf>
3. Assessment Report Fisheries Management Standard (Salmon, Hokkaido): Summary Evidence and Evidence 3.1.1 (a). p. 76-81 and 3.2.3 (b). p. 102-103.
4. [First Annual Surveillance Report. Hokkaido Federation of Fisheries Cooperative Association Chum Salmon Set-net Fishery Certification No.: JFRCA 20F2200011 Date certified: February 28, 2019. Report Prepared: August 2019. On site assessment July 21, 2019.](#)

Many thanks again for participating in the Public Consultation and we do hope that the above responses have been helpful. We look forward to a continued collaboration and dialogue going forward.

Kindest regards,



**Herman Wisse**  
GSSI Managing Director