

Haarlem, 22 November 2021

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Subject: Response to MEL MOCA Public Comments

Dear Sonia,

Many thanks for taking the time to provide your comments on the GSSI Benchmark Report for the Marine Ecolabel Japan (MEL) Monitoring of Continued Alignment (MOCA) Process.

GSSI is committed to a transparent benchmark process with opportunity for engagement and comments. Following the consultation, GSSI's detailed response to your comments by component number raised in relation to the GSSI MOCA of the MEL Fisheries Management System and Aquaculture Management System is 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 D - Fisheries

Essential Component D.4.01

The standard requires the collection and maintenance of adequate, reliable and current data and/or other information about the state and trends of the stock under consideration in accordance with applicable international standards and practices.

■ MSC comment

Not met. This GSSI component focuses on 'the requirement for data collection is focused on the assessment of the status and trends of stock under consideration 'The conclusion rationale for the Standard only cites requirements for information about the unit of certification eg catch and effort. Assessment of stock status requires significantly more information than this Standard requires, including but not limited to stock structure, stock productivity and fleet composition etc.

■ GSSI response

Based on the Public Consultation comments, no change has been made to the Conclusion or References.

The MSC comment appears to focus on the GSSI evaluation of the MEL standard, not the new evidence provided of implementation of the MEL standard as is required in the MOCA process. MSC did not comment on the initial 2019 benchmark GSSI evaluation of the MEL standard on Essential Component D.4.01. As noted in the 2019 MEL Benchmark Report of the MEL standard version 2.0 includes the following requirements:

Requirement 2.2 in the Fisheries Management Standard (version 2.0)

Data and information based on the best scientific evidence available shall be collected and maintained in order to assess the current status and trends of the stock under consideration.

Indicator(s) 2.2 (a) in the Fisheries Management Standard: Guidelines for Auditors – Indicators of Conformity – (version 2.1)

(a) Whether the following scientific evidence data are collected and maintained for the management of the stock under consideration, based on international standards such as FAO Guidelines for the routine collection of capture fishery data (hereinafter referred to as FAO Guidelines).

- Existence of collected and maintained data on the catch volume
- Existence of collected and maintained data on the fishing effort
- Existence of collected and maintained other data necessary for the assessment of the stock under consideration

The MEL standard requirement noted above, and included in the 2019 Benchmark Report adequately addresses the MSC concern that: *Assessment of stock status requires significantly more information than this Standard requires, including but not limited to stock structure, stock productivity and fleet composition etc.*

MEL Benchmark Report on GSSI Essential Component D.4.01

CONCLUSION

MEL-J continues to be in alignment with this GSSI essential component because there have been no changes in its Fisheries Management Standard (version 2.0), 2018, or its Fisheries Management Standard: Guidelines for Auditors – Indicators of Conformity – (version 2.1), 2019. Additionally, the following MEL-J assessment and audit reports provide evidence or examples of alignment with this GSSI component:

1. Initial Assessment Report. Fukushima Federation of Fisheries Cooperative Associations, Mackerel Purse Seine Net Fishery. Certification No.: JFRCA 20F2800011. Summary Evidence and Evidence, Indicator 1.1.3(c), p. 17-19 and Indicator 2.2(a), p. 49-53.

2. Initial Assessment Report. Munakata Fisheries Cooperative Association, Japanese Pufferfish Longline Fishery. Certification No.: JFRCA 20F6900011. Summary Evidence and Evidence, Indicator 1.1.3(c), p. 19 and Indicator 2.2(a), p. 45-50.

REFERENCES

1. Fisheries Management Standard (version 2.0), 2018, <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, <https://melj.jp/eng/wp-content/uploads/2019/04/Fisheries-Management-Standard-Guidelines-for-Auditors-Indicators-of-Conformity-Version.-2.1.pdf>
3. Initial Assessment Report. Fukushima Federation of Fisheries Cooperative Associations, Mackerel Purse Seine Net Fishery. Certification No.: JFRCA 20F2800011. Available online: http://www.fish-jfrca.jp/04/pdf/mel/capture_fisheries_JFRCA20F2800011.pdf
4. Initial Assessment Report. Munakata Fisheries Cooperative Association, Japanese Pufferfish Longline Fishery. Certification No.: JFRCA 20F6900011. Available online: http://www.fish-jfrca.jp/04/pdf/mel/capture_fisheries_JFRCA20F6900011.pdf

Essential Component D.4.02

The standard requires the collection and maintenance of adequate, reliable and current data and/or other information about the effects of the unit of certification, including any associated enhancement activities, on ecosystem structure, processes and function in accordance with applicable international standards and practices.

■ MSC comment

There are no definitions for terms that are critical for this requirement to be auditable by assessors including 'adequate, reliable and current data and/or other information' and 'ecosystem structure, processes and function'. Terms like adequate and reliable are subjective without a definition. Further it says 'in accordance with applicable international standards and practices.' What international standards? How does an assessor determine if the standard and/or practises are 'applicable'.

■ GSSI response

Based on the Public Consultation comments, no change has been made to the Conclusion or References.

The MSC comment appears to focus on the initial Benchmark Process of MEL, not the additional evidence provided of implementation of the MEL standard as is required in the MOCA process. MSC provided a similar comment on the 2019 initial benchmark GSSI evaluation of the MEL standard on Essential Component D.4.02, and the GSSI IE offered the following response in the 2019 MEL benchmark:

The MSC comment expresses concern that issues related to data quality are not covered in the MEL requirement 3.1.1, (for example there is no criteria on the time series or scale of data required). As noted in responses to previous MSC comments regarding the lack of specificity in the MEL requirements, the GSSI benchmark tool also lacks this specificity or criteria. The GSSI benchmark tool is intentionally not prescriptive. No change in the IE conclusion is required.

The previously provided response to the MSC in 2019 remains appropriate for this MSC comment in the MEL MOCA.

MEL Benchmark Report on GSSI Essential Component D.4.02

CONCLUSION

MEL-J continues to be in alignment with this GSSI essential component because there have been no changes in its Fisheries Management Standard (version 2.0), 2018, or its Fisheries Management Standard: Guidelines for Auditors – Indicators of Conformity – (version 2.1), 2019. Additionally, the following MEL-J assessment and audit reports provide evidence or examples of alignment with this GSSI component:

1. Initial Assessment Report. Fukushima Federation of Fisheries Cooperative Associations, Mackerel Purse Seine Net Fishery. Certification No.: JFRCA 20F2800011. Summary Evidence and Evidence, Indicator 3.1.1(a)(5), p. 76-81.
2. Initial Assessment Report. Munakata Fisheries Cooperative Association, Japanese Pufferfish Longline Fishery. Certification No.: JFRCA 20F6900011. Summary Evidence and Evidence, Indicator 3.1.1(a)(5), p. 75-79 and Indicator 3.2.3(b), p. 101-102.
3. Initial Assessment Report. Kii Channel Central Motor Vessel Boat Seine Cooperatives, Shirasu Boat Seine Net Fishery. Certification No.: JFRCA 20F5700011. Summary Evidence and Evidence, Indicator 3.1.1(a)(5), p. 83-89.

REFERENCES

1. Fisheries Management Standard (version 2.0), 2018, <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, <https://melj.jp/eng/wp-content/uploads/2019/04/Fisheries-Management-Standard-Guidelines-for-Auditors-Indicators-of-Conformity-Version.-2.1.pdf>
3. Initial Assessment Report. Fukushima Federation of Fisheries Cooperative Associations, Mackerel Purse Seine Net Fishery. Certification No.: JFRCA 20F2800011. Available online: http://www.fish-jfrca.jp/04/pdf/mel/capture_fisheries_JFRCA20F2800011.pdf
4. Initial Assessment Report. Munakata Fisheries Cooperative Association, Japanese Pufferfish Longline Fishery. Certification No.: JFRCA 20F6900011. Available online: http://www.fish-jfrca.jp/04/pdf/mel/capture_fisheries_JFRCA20F6900011.pdf
5. Initial Assessment Report. Kii Channel Central Motor Vessel Boat Seine Cooperatives, Shirasu Boat Seine Net Fishery. Certification No.: JFRCA 20F5700011. Available online: http://www.fish-jfrca.jp/04/pdf/mel/capture_fisheries_JFRCA20F5700011.pdf

Essential Component D.4.03

The standard requires the collection and maintenance of adequate, reliable and current data and/or other information on non-target catches and discards in the unit of certification.

■ MSC comment

There is no description in the Standard or supporting documentation cited that explains what 'adequate, reliable and other current data/ information' is. Nor how 'appropriate related data/information' is defined. This makes it impossible for an assessor to determine. How does the Standard ensure that assessors interpret these in a consistent credible and robust manner?

■ GSSI response

Based on the Public Consultation comments, no change has been made to the Conclusion or References.

The MSC comment appears to focus on the initial Benchmark Process of MEL, not the additional evidence provided of implementation of the MEL standard as is required in the MOCA process. MSC provided a similar comment on the 2019 initial benchmark GSSI evaluation of the MEL standard on Essential Component D.4.03 essentially repeating its comments on D.4.02, and the GSSI IE offered the following response in the 2019 MEL benchmark:

The MSC comments states: "as per the comment on D.4.02". This GSSI EC states that the standard must require the collection and maintenance of adequate, reliable and current data and/or other information on non-target catches and discards in the unit of certification. The GSSI response to the MSC comment on D.4.02 stated: as noted in responses to previous MSC comments regarding the lack of specificity or criteria in the MEL requirements, the GSSI benchmark tool also lacks this specificity. The GSSI benchmark tool is intentionally not prescriptive.

The previously provided response to the MSC in 2019 remains appropriate for this MSC comment in the MEL MOCA.

MEL Benchmark Report on GSSI Essential Component D.4.03

CONCLUSION

MEL-J continues to be in alignment with this GSSI essential component because there have been no changes in its Fisheries Management Standard (version 2.0), 2018, or its Fisheries Management Standard: Guidelines for Auditors – Indicators of Conformity – (version 2.1), 2019. Additionally, the following MEL-J assessment and audit reports provide evidence or examples of alignment with this GSSI component:

1. Initial Assessment Report. Fukushima Federation of Fisheries Cooperative Associations, Mackerel Purse Seine Net Fishery. Certification No.: JFRCA 20F2800011. Summary Evidence and Evidence, Indicator 3.1.1(a)(1), p. 76-81.
2. Initial Assessment Report. Munakata Fisheries Cooperative Association, Japanese Pufferfish Longline Fishery. Certification No.: JFRCA 20F6900011. Summary Evidence and Evidence, Indicator 3.1.1(a)(1), p. 75-79.
3. Initial Assessment Report. Kii Channel Central Motor Vessel Boat Seine Cooperatives, Shirasu Boat Seine Net Fishery. Certification No.: JFRCA 20F5700011. Summary Evidence and Evidence, Indicator 3.1.1(a)(1), p. 83-89.

REFERENCES

1. Fisheries Management Standard (version 2.0), 2018, <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,

<https://melj.jp/eng/wp-content/uploads/2019/04/Fisheries-Management-Standard-Guidelines-for-Auditors-Indicators-of-Conformity-Version.-2.1.pdf>

3. Initial Assessment Report. Fukushima Federation of Fisheries Cooperative Associations, Mackerel Purse Seine Net Fishery. Certification No.: JFRCA 20F2800011. Available online: http://www.fish-jfrca.jp/04/pdf/mel/capture_fisheries_JFRCA20F2800011.pdf
4. Initial Assessment Report. Munakata Fisheries Cooperative Association, Japanese Pufferfish Longline Fishery. Certification No.: JFRCA 20F6900011. Available online: http://www.fish-jfrca.jp/04/pdf/mel/capture_fisheries_JFRCA20F6900011.pdf
5. Initial Assessment Report. Kii Channel Central Motor Vessel Boat Seine Cooperatives, Shirasu Boat Seine Net Fishery. Certification No.: JFRCA 20F5700011. Available online: http://www.fish-jfrca.jp/04/pdf/mel/capture_fisheries_JFRCA20F5700011.pdf

Essential Component D.4.04

The standard requires the collection and maintenance of adequate, reliable and current data and/or other information about the state and trends of the stock under consideration in accordance with applicable international standards and practices.

■ MSC comment

In reference to the rationale for meeting this GSSI component: "(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."

There is no description in the Standard or supporting documentation cited that explains what 'adequate, reliable and other current data/ information' is. Nor how 'appropriate related data/information' is defined. This makes it impossible for an assessor to determine. How does the Standard ensure that assessors interpret these in a consistent credible and robust manner?

Additionally, the rationale does not cite what information is required to measure indirect effects of the fishery on Endangered species.

■ GSSI response

Based on the Public Consultation comments, no change has been made to the Conclusion or References.

The MSC comment appears to focus on the initial Benchmark Process of MEL, not the additional evidence provided of implementation of the MEL standard as is required in the MOCA process. MSC provided a similar comment on the 2019 initial benchmark GSSI evaluation of the MEL standard on Essential Component D.4.04 essentially repeating its comments on D.4.02, and the GSSI IE offered the following response in the 2019 MEL benchmark:

The MSC comment states: "as per the comment on D.4.02". This GSSI EC states that the standard must require the collection and maintenance of adequate, reliable and current data and/or other information about the effects of the unit of certification, including any associated enhancement activities, on endangered species in accordance with applicable international standards and practices. The GSSI response to the MSC comment on D.4.02 stated: as noted in responses to previous MSC comments regarding the lack of specificity or criteria in the MEL requirements, the GSSI benchmark tool also lacks this specificity. The GSSI benchmark tool is intentionally not prescriptive.

The previously provided response to the MSC in 2019 remains appropriate for this MSC comment in the MEL MOCA.

MEL Benchmark Report on GSSI Essential Component D.4.04

CONCLUSION

MEL-J continues to be in alignment with this GSSI essential component because there have been no changes in its Fisheries Management Standard (version 2.0), 2018, or its Fisheries Management Standard: Guidelines for Auditors – Indicators of Conformity – (version 2.1), 2019. Additionally, the following MEL-J assessment and audit reports provide evidence or examples of alignment with this GSSI component:

1. Initial Assessment Report. Fukushima Federation of Fisheries Cooperative Associations, Mackerel Purse Seine Net Fishery. Certification No.: JFRCA 20F2800011. Summary Evidence and Evidence, Indicator 3.1.1(a)(2), p. 76-81.
2. Initial Assessment Report. Munakata Fisheries Cooperative Association, Japanese Pufferfish Longline Fishery. Certification No.: JFRCA 20F6900011. Summary Evidence and Evidence, Indicator 3.1.1(a)(2), p. 75-79 and Indicator 3.2.3(b), p. 101-102.
3. Initial Assessment Report. Kii Channel Central Motor Vessel Boat Seine Cooperatives, Shirasu Boat Seine Net Fishery. Certification No.: JFRCA 20F5700011. Summary Evidence and Evidence, Indicator 3.1.1(a)(2), p. 83-89.

REFERENCES

1. Fisheries Management Standard (version 2.0), 2018, <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, <https://melj.jp/eng/wp-content/uploads/2019/04/Fisheries-Management-Standard-Guidelines-for-Auditors-Indicators-of-Conformity-Version.-2.1.pdf>
3. Initial Assessment Report. Fukushima Federation of Fisheries Cooperative Associations, Mackerel Purse Seine Net Fishery. Certification No.: JFRCA 20F2800011. Available online: http://www.fish-jfrca.jp/04/pdf/mel/capture_fisheries_JFRCA20F2800011.pdf
4. Initial Assessment Report. Munakata Fisheries Cooperative Association, Japanese Pufferfish Longline Fishery. Certification No.: JFRCA 20F6900011. Available online: http://www.fish-jfrca.jp/04/pdf/mel/capture_fisheries_JFRCA20F6900011.pdf
5. Initial Assessment Report. Kii Channel Central Motor Vessel Boat Seine Cooperatives, Shirasu Boat Seine Net Fishery. Certification No.: JFRCA 20F5700011. Available online: http://www.fish-jfrca.jp/04/pdf/mel/capture_fisheries_JFRCA20F5700011.pdf

Essential Component D.4.05

The standard requires that there is knowledge within the fishery management system of the essential habitats for the stock under consideration and habitats that are highly vulnerable to damage by the fishing gear of the unit of certification. This includes knowledge of the full spatial range of the relevant habitat, not just that part of the spatial range that is potentially affected by fishing.

■ **MSC comment**

There is definition for highly vulnerable habitats in the Standard glossary. A definition is critical to whether this requirement, which is more or less the exact wording of the GSSI essential component, is auditable for an assessment team to use in practice. etc.

■ **GSSI response**

Based on the Public Consultation comments, no change has been made to the Conclusion or References.

The MSC comment appears to focus on the initial Benchmark Process of MEL, not the additional evidence provided of implementation of the MEL standard as is required in the MOCA process. MSC provided a similar comment on the 2019 initial benchmark GSSI evaluation of the MEL standard on Essential Component D.4.05. As noted in the 2019 MEL benchmark evaluation of the MEL standard version 2.0 includes the following requirements:

Indicator(s) 3.1.1 (a) (3) 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:

(3) Assessment of the impacts of the unit of certification on 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 in the full spatial range of the relevant habitat, not just that part of the spatial range that is potentially affected by fishing with appropriate related data/information.

Neither the GSSI benchmark Tool nor the MEL standard offer any specific definition of what is a "highly vulnerable habitat". As noted in responses to previous MSC comments regarding the lack of specificity or criteria in the MEL requirements, the GSSI Benchmark Tool is intentionally not prescriptive.

MEL Benchmark Report on GSSI Essential Component D.4.05

CONCLUSION

MEL-J continues to be in alignment with this GSSI essential component because there have been no changes in its Fisheries Management Standard (version 2.0), 2018, or its Fisheries Management Standard: Guidelines for Auditors – Indicators of Conformity – (version 2.1), 2019. Additionally, the following MEL-J assessment and audit reports provide evidence or examples of alignment with this GSSI component:

1. Initial Assessment Report. Fukushima Federation of Fisheries Cooperative Associations, Mackerel Purse Seine Net Fishery. Certification No.: JFRCA 20F2800011. Summary Evidence and Evidence, Indicator 3.1.1(a)(3), p. 76-81.
2. Initial Assessment Report. Munakata Fisheries Cooperative Association, Japanese Pufferfish Longline Fishery. Certification No.: JFRCA 20F6900011. Summary Evidence and Evidence, Indicator 3.1.1(a)(3), p. 75-79.
3. Initial Assessment Report. Kii Channel Central Motor Vessel Boat Seine Cooperatives, Shirasu Boat Seine Net Fishery. Certification No.: JFRCA 20F5700011. Summary Evidence and Evidence, Indicator 3.1.1(a)(3), p. 83-89.

REFERENCES

1. Fisheries Management Standard (version 2.0), 2018, <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, <https://melj.jp/eng/wp-content/uploads/2019/04/Fisheries-Management-Standard-Guidelines-for-Auditors-Indicators-of-Conformity-Version.-2.1.pdf>

3. Initial Assessment Report. Fukushima Federation of Fisheries Cooperative Associations, Mackerel Purse Seine Net Fishery. Certification No.: JFRCA 20F2800011. Available online: http://www.fish-jfrca.jp/04/pdf/mel/capture_fisheries_JFRCA20F2800011.pdf
4. Initial Assessment Report. Munakata Fisheries Cooperative Association, Japanese Pufferfish Longline Fishery. Certification No.: JFRCA 20F6900011. Available online: http://www.fish-jfrca.jp/04/pdf/mel/capture_fisheries_JFRCA20F6900011.pdf
5. Initial Assessment Report. Kii Channel Central Motor Vessel Boat Seine Cooperatives, Shirasu Boat Seine Net Fishery. Certification No.: JFRCA 20F5700011. Available online: http://www.fish-jfrca.jp/04/pdf/mel/capture_fisheries_JFRCA20F5700011.pdf

Essential Component D.4.06

The standard requires that data and information are collected on the role of the stock under consideration in the food-web to enable determination of whether it is a key prey species in the ecosystem, and if so whether fishing on that stock might result in severe adverse impacts on dependent predators.

■ MSC comment

There is no definition of key prey species which makes it impossible to know what information is appropriate.

■ GSSI response

Based on the Public Consultation comments, no change has been made to the Conclusion or References.

The MSC comment appears to focus on the initial Benchmark Process of MEL, not the additional evidence provided of implementation of the MEL standard as is required in the MOCA process. MSC provided a similar comment on the 2019 initial benchmark GSSI evaluation of the MEL standard on Essential Component D.4.06, essentially repeating its comments on D.4.02, and the GSSI IE offered the following response in the 2019 MEL benchmark:

The MSC comment states: "as per the comment on D.4.02". This GSSI EC states that the standard requires that data and information are collected on the role of the stock under consideration in the food-web to enable determination of whether it is a key prey species in the ecosystem, and if so whether fishing on that stock might result in severe adverse impacts on dependent predators.. The GSSI response to the MSC comment on D.4.02 stated: as noted in responses to previous MSC comments regarding the lack of specificity or criteria in the MEL requirements, the GSSI benchmark tool also lacks this specificity. The GSSI benchmark tool is intentionally not prescriptive.

The previously provided response to the MSC in 2019 remains appropriate for this MSC comment in the MEL MOCA.

MEL Benchmark Report on GSSI Essential Component D.4.06

CONCLUSION

MEL-J continues to be in alignment with this GSSI essential component because there have been no changes in its Fisheries Management Standard (version 2.0), 2018, or its Fisheries Management Standard: Guidelines for Auditors – Indicators of Conformity – (version 2.1), 2019. Additionally, the following MEL-J assessment and audit reports provide evidence or examples of alignment with this GSSI component:

1. Initial Assessment Report. Fukushima Federation of Fisheries Cooperative Associations, Mackerel Purse Seine Net

Fishery. Certification No.: JFRCA 20F2800011. Summary Evidence and Evidence, Indicator 3.1.1(a)(4), p. 76-81.

2. Initial Assessment Report. Munakata Fisheries Cooperative Association, Japanese Pufferfish Longline Fishery. Certification No.: JFRCA 20F6900011. Summary Evidence and Evidence, Indicator 3.1.1(a)(4), p. 75-79.

3. Initial Assessment Report. Kii Channel Central Motor Vessel Boat Seine Cooperatives, Shirasu Boat Seine Net Fishery. Certification No.: JFRCA 20F5700011. Summary Evidence and Evidence, Indicator 3.1.1(a)(4), p. 83-89.

REFERENCES

1. Fisheries Management Standard (version 2.0), 2018, <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, <https://melj.jp/eng/wp-content/uploads/2019/04/Fisheries-Management-Standard-Guidelines-for-Auditors-Indicators-of-Conformity-Version.-2.1.pdf>
3. Initial Assessment Report. Fukushima Federation of Fisheries Cooperative Associations, Mackerel Purse Seine Net Fishery. Certification No.: JFRCA 20F2800011. Available online: http://www.fish-jfrca.jp/04/pdf/mel/capture_fisheries_JFRCA20F2800011.pdf
4. Initial Assessment Report. Munakata Fisheries Cooperative Association, Japanese Pufferfish Longline Fishery. Certification No.: JFRCA 20F6900011. Available online: http://www.fish-jfrca.jp/04/pdf/mel/capture_fisheries_JFRCA20F6900011.pdf
5. Initial Assessment Report. Kii Channel Central Motor Vessel Boat Seine Cooperatives, Shirasu Boat Seine Net Fishery. Certification No.: JFRCA 20F5700011. Available online: http://www.fish-jfrca.jp/04/pdf/mel/capture_fisheries_JFRCA20F5700011.pdf

Essential Component D.5.01

The standard requires management decisions by the fishery management organization or arrangement (D.1.02) to be based on an assessment of the current status and trends of the stock under consideration, using adequate, reliable and current data and/or other information. Other information may include generic evidence based on similar stocks, when specific information on the stock under consideration is not available, providing there is low risk to the stock under consideration in accordance with the Precautionary Approach.

■ MSC comment

The same issue presents itself across all of D.5. The requirements cited for MEL are on INFORMATION for assessment of impact on non-target species and ecosystem; not requirements for an assessment or about assessment methodologies. Additionally the exact same requirements are cited in D.5 and the partner D.4 component and the same requirement cannot address both simultaneously or there wouldn't be separate sections in the benchmark.

■ GSSI response

Based on the Public Consultation comments, no change has been made to the Conclusion or References.

The MSC comment appears to focus on the initial Benchmark Process of MEL, not the additional evidence provided of implementation of the MEL standard as is required in the MOCA process. MSC provided a similar comment on the 2019 initial benchmark GSSI evaluation of the MEL standard on Essential Component D.5.01.

D.5.01 requires that management decision to be based on an assessment of the status and trends of the stock under consideration. The IE conclusion in the 2019 benchmark cites the following MEL requirements and indicators as meeting this GSSI EC:

Requirement 1.2.6 in the Fisheries Management Standard (version 2.0)

Taking due account of various uncertainty inherent in fisheries stocks, ecosystem and stock management, precautional fisheries management is undertaken. There shall be a mechanism to change and improve management measures in an adaptive manner depending on the status of the stock under consideration and of the ecosystem.

Indicator(s) 1.2.6 (a) in the Fisheries Management Standard: Guidelines for Auditors – Indicators of Conformity – (version 2.1)

(a) Whether a mechanism exists in order to change and improve management measures in an adaptive manner to unexpected changes of the situation on the stock under consideration and relative matters due to environmental changes, etc.

- Existence of the mechanism of precautionary measures and adaptive management

Requirement 2.4 in the Fisheries Management Standard (version 2.0)

Assessment of the current status and trends of the stock under consideration shall be conducted based on the data and information collected, and management decisions shall be made accordingly taking into account the assessment results. The methodology and results of the assessment shall be made publicly available in a timely manner.

Indicator(s) 2.4 (a) and (b) in the Fisheries Management Standard: Guidelines for Auditors – Indicators of Conformity – (version 2.1)

(a) Whether an assessment is conducted with the best scientific evidence available. Further, whether an adaptive management with precautionary approach is implemented with regard to the result of the assessment.

- Implementation of a assessment with the best scientific evidence available
- Implementation of the adaptive management with precautionary approach based on the assessment above

(b) Whether the assessment is reflected in decision-making process to formulate a stock management guideline and a stock management plan.

- Existence of a report or minutes showing the reflection

Contrary to the MSC comment, the requirements and indicator cited in the 2019 benchmark IE conclusion are not related to non-target species, but are specifically directed to the sections of the MEL standard and guidelines that address the management system actions for the target stock (section 1) and the assessment of the status of the target stock (section 2).

MEL Benchmark Report on GSSI Essential Component D.5.01

CONCLUSION

MEL-J continues to be in alignment with this GSSI essential component because there have been no changes in its Fisheries Management Standard (version 2.0), 2018, or its Fisheries Management Standard: Guidelines for Auditors – Indicators of Conformity – (version 2.1), 2019. Additionally, the following MEL-J assessment and audit reports provide evidence or examples of alignment with this GSSI component:

1. Initial Assessment Report. Fukushima Federation of Fisheries Cooperative Associations, Mackerel Purse Seine Net Fishery. Certification No.: JFRCA 20F2800011. Summary Evidence and Evidence, Indicator 1.2.6(a), p. 36, Indicator 2.4(a), p. 57, and Indicator 2.4(b), p. 58.

2. Initial Assessment Report. Mankato Fisheries Cooperative Association, Japanese Pufferfish Longline Fishery.

Certification No.: JFRCA 20F6900011. Summary Evidence and Evidence, Indicator 1.2.6(a), p. 36-38, Indicator 2.4(a), p. 55-57, and Indicator 2.4(b), p. 58.

3. Initial Assessment Report. Kii Channel Central Motor Vessel Boat Seine Cooperatives, Shirasu Boat Seine Net Fishery. Certification No.: JFRCA 20F5700011. Summary Evidence and Evidence, Indicator 1.2.6(a), p. 29-30, Indicator 2.4(a), p. 51-57, and Indicator 2.4(b), p. 58-59.

REFERENCES

1. Fisheries Management Standard (version 2.0), 2018, <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, <https://melj.jp/eng/wp-content/uploads/2019/04/Fisheries-Management-Standard-Guidelines-for-Auditors-Indicators-of-Conformity-Version.-2.1.pdf>
3. Initial Assessment Report. Fukushima Federation of Fisheries Cooperative Associations, Mackerel Purse Seine Net Fishery. Certification No.: JFRCA 20F2800011. Available online: http://www.fish-jfrca.jp/04/pdf/mel/capture_fisheries_JFRCA20F2800011.pdf
4. Initial Assessment Report. Mankato Fisheries Cooperative Association, Japanese Pufferfish Longline Fishery. Certification No.: JFRCA 20F6900011. Available online: http://www.fish-jfrca.jp/04/pdf/mel/capture_fisheries_JFRCA20F6900011.pdf
5. Initial Assessment Report. Kii Channel Central Motor Vessel Boat Seine Cooperatives, Shirasu Boat Seine Net Fishery. Certification No.: JFRCA 20F5700011. Available online: http://www.fish-jfrca.jp/04/pdf/mel/capture_fisheries_JFRCA20F5700011.pdf

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.

■ MSC comment

The same issue presents itself across all of D.5. The requirements cited for MEL are on INFORMATION for assessment of impact on non-target species and ecosystem; not requirements for an assessment or about assessment methodologies. Additionally the exact same requirements are cited in D.5 and the partner D.4 component and the same requirement cannot address both simultaneously or there wouldn't be separate sections in the benchmark.

■ GSSI response

Based on the Public Consultation comments, no change has been made to the Conclusion or References.

The MSC comment appears to focus on the initial Benchmark Process of MEL, not the additional evidence provided of implementation of the MEL standard as is required in the MOCA process. MSC provided a similar comment on the 2019 initial benchmark GSSI evaluation of the MEL standard on Essential Component D.5.06 to express a perception of a lack of specificity in both the GSSI ECs and the MEL requirements and indicators.

D.5.06 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. The IE

conclusion for this EC in the 2019 benchmark assessment determined alignment based on the following MEL requirements and indicators:

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.

Contrary to the MSC comment, the requirements and indicator cited in the 2019 benchmark IE conclusion are related solely to information on non-target species, but are specifically taken from the section 3 of the MEL standard and guidelines that address non-target species. The comments has therefore not led to a change in the conclusion for MEL's continued alignment.

MEL Benchmark Report on GSSI Essential Component D.5.06

CONCLUSION

MEL-J continues to be in alignment with this GSSI essential component because there have been no changes in its Fisheries Management Standard (version 2.0), 2018, or its Fisheries Management Standard: Guidelines for Auditors – Indicators of Conformity – (version 2.1), 2019. Additionally, the following MEL-J assessment and audit reports provide evidence or examples of alignment with this GSSI component:

1. Initial Assessment Report. Fukushima Federation of Fisheries Cooperative Associations, Mackerel Purse Seine Net Fishery. Certification No.: JFRCA 20F2800011. Summary Evidence and Evidence, Indicator 1.2.6(a), p. 36, Indicator 2.4(a), p. 57, and Indicator 2.4(b), p. 58.
2. Initial Assessment Report. Mankato Fisheries Cooperative Association, Japanese Pufferfish Longline Fishery. Certification No.: JFRCA 20F6900011. Summary Evidence and Evidence, Indicator 1.2.6(a), p. 36-38, Indicator 2.4(a), p. 55-57, and Indicator 2.4(b), p. 58.
3. Initial Assessment Report. Kii Channel Central Motor Vessel Boat Seine Cooperatives, Shirasu Boat Seine Net Fishery. Certification No.: JFRCA 20F5700011. Summary Evidence and Evidence, Indicator 1.2.6(a), p. 29-30, Indicator 2.4(a), p. 51-57, and Indicator 2.4(b), p. 58-59.

REFERENCES

1. Fisheries Management Standard (version 2.0), 2018, <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, <https://melj.jp/eng/wp-content/uploads/2019/04/Fisheries-Management-Standard-Guidelines-for-Auditors-Indicators-of-Conformity-Version.-2.1.pdf>
3. Initial Assessment Report. Fukushima Federation of Fisheries Cooperative Associations, Mackerel Purse Seine Net Fishery. Certification No.: JFRCA 20F2800011. Available online: http://www.fish-jfrca.jp/04/pdf/mel/capture_fisheries_JFRCA20F2800011.pdf
4. Initial Assessment Report. Mankato Fisheries Cooperative Association, Japanese Pufferfish Longline Fishery. Certification No.: JFRCA 20F6900011. Available online: http://www.fish-jfrca.jp/04/pdf/mel/capture_fisheries_JFRCA20F6900011.pdf
5. Initial Assessment Report. Kii Channel Central Motor Vessel Boat Seine Cooperatives, Shirasu Boat Seine Net Fishery. Certification No.: JFRCA 20F5700011. Available online: http://www.fish-jfrca.jp/04/pdf/mel/capture_fisheries_JFRCA20F5700011.pdf

Essential Component D.5.07

The standard requires an analysis of the effects of the unit of certification, including any associated enhancement activities where applicable, on ecosystem structure, processes and function to develop timely scientific advice on the likelihood and magnitude of impacts.

■ MSC comment

The rationale provided for the conclusion that MEL is in alignment is the exact same text and requirements used in the conclusion of D.4.02 and is an information requirement and not an assessment methodology requirement.

■ **GSSI response**

Based on the Public Consultation comments, no change has been made to the Conclusion or References.

The MSC comment appears to focus on the initial Benchmark Process of MEL, not the additional evidence provided of implementation of the MEL standard as is required in the MOCA process. MSC provided a similar comment on the 2019 initial benchmark GSSI evaluation of the MEL standard on Essential Component D.5.07, but that comment addressed a perception of a lack of specificity in both the GSSI ECs and the MEL requirements and indicators. The GSSI response in 2019 was that the Benchmark tool is intentionally not prescriptive, and therefore does not require the Scheme Owner's standard to be prescriptive.

D.5.07 requires an analysis of the effects of the unit of certification, including any associated enhancement activities where applicable, on ecosystem structure, processes and function to develop timely scientific advice on the likelihood and magnitude of impacts. The MSC comments notes that the Conclusion in the 2019 benchmark is similar to the conclusion for EC D.4.02, and that the D.5.07 is an assessment methodology requirement, while D.4.02 is an information requirement. GSSI agrees with the MSC observation that the Benchmark Tool is structured into different performance areas, but points out that this results in some repetition in the content of the individual Essential Components. GSSI notes that the MEL standard and guidelines are not organized in the same way as the GSSI Benchmark Tool, but do in essence cover the same requirements.

D.5.07 requires an analysis of the effects of the unit of certification, including any associated enhancement activities where applicable, on ecosystem structure, processes and function to develop timely scientific advice on the likelihood and magnitude of impacts.

The 2019 benchmark found the following MEL requirements and guidelines demonstrate alignment with D.5.07:

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) (5) 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:

(5) Analysis of the effects of the unit of certification on ecosystem structure, processes and function to develop timely scientific advice on the likelihood and magnitude of impacts with appropriate related data/information 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) (4) 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:

(4) Analysis of the effects of associated culture and enhancement activities on ecosystem structure, processes and function to develop timely scientific advice on the likelihood and magnitude of impacts with appropriate related data/information 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.

The previously provided response to the MSC in 2019 remains appropriate for this MSC comment in the MEL MOCA.

MEL Benchmark Report on GSSI Essential Component D.5.07

CONCLUSION

MEL-J continues to be in alignment with this GSSI essential component because there have been no changes in its Fisheries Management Standard (version 2.0), 2018, or its Fisheries Management Standard: Guidelines for Auditors – Indicators of Conformity – (version 2.1), 2019. Additionally, the following MEL-J assessment and audit reports provide evidence or examples of alignment with this GSSI component:

1. Initial Assessment Report. Fukushima Federation of Fisheries Cooperative Associations, Mackerel Purse Seine Net Fishery. Certification No.: JFRCA 20F2800011. Summary Evidence and Evidence, Indicator 1.1.3(c), p. 17-19 and Indicator 2.2(a), p. 49-53.

2. Initial Assessment Report. Munakata Fisheries Cooperative Association, Japanese Pufferfish Longline Fishery. Certification No.: JFRCA 20F6900011. Summary Evidence and Evidence, Indicator 1.1.3(c), p. 19 and Indicator 2.2(a), p. 45-50.

REFERENCES

1. Fisheries Management Standard (version 2.0), 2018, <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, <https://melj.jp/eng/wp-content/uploads/2019/04/Fisheries-Management-Standard-Guidelines-for-Auditors-Indicators-of-Conformity-Version.-2.1.pdf>
3. Initial Assessment Report. Fukushima Federation of Fisheries Cooperative Associations, Mackerel Purse Seine Net Fishery. Certification No.: JFRCA 20F2800011. Available online: http://www.fish-jfrca.jp/04/pdf/mel/capture_fisheries_JFRCA20F2800011.pdf
4. Initial Assessment Report. Munakata Fisheries Cooperative Association, Japanese Pufferfish Longline Fishery. Certification No.: JFRCA 20F6900011. Available online: http://www.fish-jfrca.jp/04/pdf/mel/capture_fisheries_JFRCA20F6900011.pdf
5. Initial Assessment Report. Kii Channel Central Motor Vessel Boat Seine Cooperatives, Shirasu Boat Seine Net Fishery. Certification No.: JFRCA 20F5700011. Available online: http://www.fish-jfrca.jp/04/pdf/mel/capture_fisheries_JFRCA20F5700011.pdf

Essential Component D.5.08

The standard requires an assessment of the impacts of the unit of certification, including any associated enhancement activities where applicable, on 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 assessment should consider the full spatial range of the relevant habitat, not just that part of the spatial range that is potentially affected by fishing.

- **MSC comment**

The rationale provided for the conclusion that MEL is in alignment is the exact same text and requirements used in the conclusion of D.4.05 and is an information requirement and not an assessment methodology requirement.

- **GSSI response**

Based on the Public Consultation comments, no change has been made to the Conclusion or References.

The MSC comment appears to focus on the initial Benchmark Process of MEL, not the additional evidence provided of implementation of the MEL standard as is required in the MOCA process. MSC provided a similar comment on the 2019 initial benchmark GSSI evaluation of the MEL standard on Essential Component D.5.08, but that comment addressed a perception of a lack of specificity in both the GSSI ECs and the MEL requirements and indicators. The GSSI response in 2019 was that the Benchmark tool is intentionally not prescriptive, and therefore does not require the Scheme Owner's standard to be prescriptive.

D.5.08 requires an assessment of the impacts of the unit of certification, including any associated enhancement activities where applicable, on 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 assessment should consider the full spatial range of the relevant habitat, not just that part of the spatial range that is potentially affected by fishing.

The MSC comments note that the IE conclusion in the 2019 benchmark is similar to the conclusion for D.4.05, and that the D.5.08 is an assessment methodology requirement, while D.4.05 is an information requirement. GSSI agrees with the MSC observation that the Benchmark Tool is structured into different performance areas, but points out that this results in some repetition in the content of the individual Essential Components. GSSI notes that the MEL standard and guidelines are not organized in the same way as the GSSI Benchmark Tool, but do in essence cover the same requirements.

The 2019 benchmark found the following MEL requirements and guidelines demonstrate alignment with D.5.08:

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) (3) 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:

(3) Assessment of the impacts of the unit of certification on 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 in the full spatial range of the relevant habitat, not just that part of the spatial range that is potentially affected by fishing 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) (3) 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:

(3) Assessment of the impacts of associated culture and enhancement activities on 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 in the full spatial range of the relevant habitat, not just that part of the spatial range that is potentially affected by fishing

- 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.

The previously provided response to the MSC in 2019 remains appropriate for this MSC comment in the MEL MOCA.

MEL Benchmark Report on GSSI Essential Component D.5.08

CONCLUSION

MEL-J continues to be in alignment with this GSSI essential component because there have been no changes in its Fisheries Management Standard (version 2.0), 2018, or its Fisheries Management Standard: Guidelines for Auditors – Indicators of Conformity – (version 2.1), 2019. Additionally, the following MEL-J assessment and audit reports provide evidence or examples of alignment with this GSSI component:

1. Initial Assessment Report. Fukushima Federation of Fisheries Cooperative Associations, Mackerel Purse Seine Net Fishery. Certification No.: JFRCA 20F2800011. Summary Evidence and Evidence, Indicator 3.1.1(a)(3), p. 76-81.
2. Initial Assessment Report. Munakata Fisheries Cooperative Association, Japanese Pufferfish Longline Fishery. Certification No.: JFRCA 20F6900011. Summary Evidence and Evidence, Indicator 3.1.1(a)(3), p. 75-79 and Indicator 3.2.3(b)(3), p. 101-102.
3. Initial Assessment Report. Kii Channel Central Motor Vessel Boat Seine Cooperatives, Shirasu Boat Seine Net Fishery. Certification No.: JFRCA 20F5700011. Summary Evidence and Evidence, Indicator 3.1.1(a)(3), p. 83-89.

REFERENCES

1. Fisheries Management Standard (version 2.0), 2018, <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, <https://melj.jp/eng/wp-content/uploads/2019/04/Fisheries-Management-Standard-Guidelines-for-Auditors-Indicators-of-Conformity-Version.-2.1.pdf>
3. Initial Assessment Report. Fukushima Federation of Fisheries Cooperative Associations, Mackerel Purse Seine Net Fishery. Certification No.: JFRCA 20F2800011. Available online: http://www.fish-jfrca.jp/04/pdf/mel/capture_fisheries_JFRCA20F2800011.pdf
4. Initial Assessment Report. Munakata Fisheries Cooperative Association, Japanese Pufferfish Longline Fishery. Certification No.: JFRCA 20F6900011. Available online: http://www.fish-jfrca.jp/04/pdf/mel/capture_fisheries_JFRCA20F6900011.pdf
5. Initial Assessment Report. Kii Channel Central Motor Vessel Boat Seine Cooperatives, Shirasu Boat Seine Net Fishery. Certification No.: JFRCA 20F5700011. Available online: http://www.fish-jfrca.jp/04/pdf/mel/capture_fisheries_JFRCA20F5700011.pdf

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.

■ MSC comment

The rationale provided for the conclusion that MEL is in alignment is the exact same text and requirements used in the conclusion of D.4.04 yet these 2 GSSI components have subtle differences not accounted for in the MEL requirements.

Under this Essential Component the standard must require an assessment of the impacts of the unit of certification on these species yet the referenced text from the MEL Standard does NOT require assessment of impacts, it requires that 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.

Simply put the MEL requirement is an information requirement and not an assessment methodologies requirement.

■ GSSI response

Based on the Public Consultation comments, no change has been made to the Conclusion or References.

The MSC comment appears to focus on the initial Benchmark Process of MEL, not the additional evidence provided of implementation of the MEL standard as is required in the MOCA process. MSC provided a similar comment on the 2019 initial benchmark GSSI evaluation of the MEL standard on Essential Component D.5.10, but that comment addressed a perception of a lack of specificity in both the GSSI Essential Components and the MEL requirements and indicators. The GSSI response in 2019 was that the Benchmark tool is intentionally not prescriptive, and therefore does not require the Scheme Owner's standard to be prescriptive.

D.5.10 requires an assessment of the impacts of the unit of certification, including any associated enhancement activities where applicable, on endangered species.

The MSC comments notes that the IE conclusion in the 2019 benchmark is similar to the conclusion for EC D.4.04, and that the D.5.10 is an assessment methodology requirement, while D.4.04 is an information requirement GSSI agrees with the MSC observation that the Benchmark Tool is structured into different performance areas, but points out that this results in some repetition in the content of the individual Essential Components. GSSI notes that the MEL standard and guidelines are not organized in the same way as the GSSI Benchmark Tool, but do in essence cover the same requirements.

The 2019 benchmark found the following MEL requirements and guidelines demonstrate alignment with D.5.10:

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.

The MSC comment states that with regard to endangered species, " the MEL Standard does NOT require assessment of impacts". However, as shown above in paragraph MEL Indicator 3.1.1 (a) (2) in the Fisheries Management Standard: Guidelines for Auditors – Indicators of Conformity – (version 2.1), requires (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. Therefore it is found that the MEL standard and guidelines are in alignment with D.5.10.

MEL Benchmark Report on GSSI Essential Component D.5.10

CONCLUSION

MEL-J continues to be in alignment with this GSSI essential component because there have been no changes in its Fisheries Management Standard (version 2.0), 2018, or its Fisheries Management Standard: Guidelines for Auditors – Indicators of Conformity – (version 2.1), 2019. Additionally, the following MEL-J assessment and audit reports provide evidence or examples of alignment with this GSSI component:

1. Initial Assessment Report. Fukushima Federation of Fisheries Cooperative Associations, Mackerel Purse Seine Net Fishery. Certification No.: JFRCA 20F2800011. Summary Evidence and Evidence, Indicator 3.1.1(a)(2), p. 76-81.
2. Initial Assessment Report. Munakata Fisheries Cooperative Association, Japanese Pufferfish Longline Fishery. Certification No.: JFRCA 20F6900011. Summary Evidence and Evidence, Indicator 3.1.1(a)(2), p. 75-79 and Indicator 3.2.3(b)(2), p. 101-102.
3. Initial Assessment Report. Kii Channel Central Motor Vessel Boat Seine Cooperatives, Shirasu Boat Seine Net Fishery. Certification No.: JFRCA 20F5700011. Summary Evidence and Evidence, Indicator 3.1.1(a)(2), p. 83-89.

REFERENCES

1. Fisheries Management Standard (version 2.0), 2018, <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, <https://melj.jp/eng/wp-content/uploads/2019/04/Fisheries-Management-Standard-Guidelines-for-Auditors-Indicators-of-Conformity-Version.-2.1.pdf>

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