

Haarlem, 4<sup>th</sup> of November 2021

**Jeff Regnart**

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**Subject:** Response to the comment provided for GSSI Benchmark Framework v2.0

Dear Jeff,

Many thanks for taking the time to provide your comments on the GSSI Benchmark Framework v2.0.

GSSI is committed to a transparent benchmark process with opportunity for engagement and comments. Following the consultation, the comments received from **Alaska Responsible Fisheries Management** and other stakeholders have been carefully reviewed by our Expert Working Groups. Responses to each of the comments are provided in this and other letters. After careful deliberations, the GSSI Steering Board concluded the comments had been sufficiently addressed and consequently, approved the Benchmark Framework v2.0.

Version 2.0 of the GSSI Global Benchmark Tool, which includes the Benchmark Framework v2.0, was successfully launched on October 20<sup>th</sup> during the GSSI Partners Meeting.

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.3.15

#### **Component text**

The Scheme Owner identifies all stakeholders and ensures proactively that all can participate in the standard-setting process through a consultation forum or are made aware of alternative mechanisms by which they can participate.

This includes stakeholders that are not well represented in consultations and disadvantaged stakeholders (small-scale operations and vulnerable groups).

#### **Guidance text**

The Scheme Owner has a mechanism in place to identify all affected stakeholders. It makes sure that, when needed, alternative tools are in place to leverage potential barriers to participate.

Examples of evidence for scheme alignment:

- Stakeholder mapping including past participation
- Internal procedure/quality handbook defining public consultation process.
- ToR. Review participation, communication and mechanisms/tools of past or current consultation.
- Meeting minutes, announcements, publications and or email communication indicate that the Scheme Owner is proactively seeking the input of specific stakeholder groups.

#### ■ AKRFM

This represents an increase in the level of minimum requirements, because it makes clauses which were previously Supplementary into Essential clauses. This could potentially cause an issue for Alaska RFM because at the time of the initial application and the MOCA, the scheme did not meet component A.3.15.02. In order to meet proposed V2 component A.3.15, Alaska RFM would need to demonstrate that it implements a mechanism to ensure that disadvantaged and vulnerable stakeholders are able to participate.

#### ■ GSSI response

Based on AKRFM's comment, the Component and Guidance text has been changed.

The Scheme Owners need to identify only the impacted stakeholders. The elevation from supplementary to essential is made for simplification reasons.

### **GSSI Essential Component A.3.15**

**Component text:** The Scheme Owner identifies all **impacted** stakeholders and ensures proactively that all can participate in the standard-setting process through a consultation forum or are made aware of alternative mechanisms by which they can participate.

This includes stakeholders that are not well represented in consultations and disadvantaged stakeholders (small-scale operations and vulnerable groups).

**Guidance text:** The Scheme Owner has a mechanism in place to identify **all impacted** stakeholders. It makes sure that, when needed, alternative tools are in place to leverage potential barriers to participate.

Examples of evidence for scheme alignment:

- Stakeholder mapping including past participation
- Internal procedure/quality handbook defining public consultation process.
- ToR. Review participation, communication and mechanisms/tools of past or current consultation.
- Meeting minutes, announcements, publications and or email communication indicate that the Scheme Owner is proactively seeking the input of specific stakeholder groups.

## REFERENCES

FAO 55 [77].

## ■ Section B – Operational Management

### ESSENTIAL COMPONENT B.1.01

#### **Component text**

The Scheme Owner has a contractual, enforceable arrangement or formal understanding that requires accreditation bodies to be compliant with the requirements of ISO/IEC 17011 in its applicable version.

#### **Guidance text**

The Scheme Owner has a contract, memorandum of understanding or enforceable arrangement with a certification body or accreditation body that require the accreditation bodies to be compliant to ISO/ IEC 17011.

Examples of evidence for scheme alignment:

- Contracts,
- Memorandums of understanding and/or memorandum of agreements between scheme and accreditation bodies or certification bodies that specify accreditation bodies to be compliant with ISO/IEC 17011.
- Accreditation bodies' certificate of accreditation (on website).
- Rules for accreditation bodies in standard.

#### ■ AKRFM

Will not affect Alaska RFM as long as documentation is updated to reflect new versions of ISO/IEC 17011.

#### ■ GSSI response

Based on the Public Consultation comments, the Guidance text has been changed.

Additional text has been added to the Guidance for consistency.

### **GSSI Essential Component B.1.01**

**Component text:** The Scheme Owner has a contractual, enforceable arrangement or formal understanding that requires accreditation bodies to be compliant with the requirements of ISO/IEC 17011 in its applicable version.

**Guidance text:** The Scheme Owner has a contract, memorandum of understanding or enforceable arrangement with a certification body or accreditation body that require the accreditation bodies to be compliant to ISO/ IEC 17011.

Examples of evidence for scheme alignment:

- Contracts,
- Memorandums of understanding and/or memorandum of agreements between scheme and accreditation bodies or certification bodies that specify accreditation bodies to be compliant with ISO/IEC 17011.
- Accreditation bodies' certificate of accreditation (on website).
- [Rules for accreditation bodies in scheme documents such as standard or certification methodology that are publicly available.](#)

## REFERENCES

The FAO Ecolabelling Guidelines paragraphs 64, 66, [86, 87, 88]

ISO/IEC 17011:2004 [86]

The FAO Ecolabelling Guidelines paragraphs 67, 69-77, 79-84, 87-95, 97-99 [86, 89, 91-99, 101-106, 109-119, 121-123] ,

## ESSENTIAL COMPONENT B.1.09

### **Component text**

The Scheme Owner ensures that the accreditation process includes a review of the performance of certification bodies and auditors, using witness audits.

### **Guidance text**

The Scheme Owner specifies that accreditation includes a performance review of certification bodies and auditors.

Examples of evidence for scheme alignment:

- Accreditation/certification requirements/methodologies, accreditation body audit reports, audit schedule, specified in accreditation body or certification body contracts/agreements.
- Agreement/contract between the Scheme Owner and certification body to use national accreditation bodies which are IAF members and signatories to the Multilateral Recognition Arrangement for ISO 17065.

### ■ **AKRFM**

This represents an increase in the level of minimum requirements. However, Alaska RFM meets the new requirement, as evidenced by clause 6.1.6 of the QMS system, which states “[ASMI requires that] The accreditation process includes a review of the performance of Certification Body and Assessors in the field by witness assessments, as needed or required by ASMI’s Executive Director, or designee”.

### ■ **GSSI response**

Based on the Public Consultation comments, the Guidance text has been changed.

Additional examples of performance reviews have been added to the Guidance text.

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

**Component text:** The Scheme Owner ensures that the accreditation process includes a review of the performance of certification bodies and auditors, using witness audits.

**Guidance text:** The Scheme Owner specifies that accreditation includes a performance review of certification bodies and auditors; [that may include desktop reviews, office visits, witness audits.](#)

Examples of evidence for scheme alignment:

- Accreditation/certification requirements/methodologies, accreditation body audit reports, audit schedule, specified in accreditation body or certification body contracts/agreements.
- Agreement/contract between the Scheme Owner and certification body to use national accreditation bodies which are IAF members and signatories to the Multilateral Recognition Arrangement for ISO 17065.

## **REFERENCES**

Not specifically defined in the FAO Guidelines, however this is considered a requirement for good practice in accreditation of seafood certification schemes, in the GSSI Public Consultation and Expert Consultation Workshops. It is considered a necessary level of rigour of the accreditation audit to better assess the operations of the CBs.

## ■ **Section D – Fisheries**

### **SUPPLEMENTARY COMPONENT D.3.02.02**

#### ***Component text***

The standard requires the management system to ensure that available traditional, fisher and community knowledge about the ecosystem and the fishery of which the unit of certification is part is collected and validated to contribute to implementation and monitoring of EAF. Further, information about the local situation should be complemented by information from ecologically similar situations elsewhere.

#### ***Guidance text***

The focus of this Supplemental Component is the broad data and information needs of EAF. In countries where these needs cannot be met through reports and statistics from various research institutes, agencies and ministries, there is often extensive traditional knowledge about the ecosystem and the fishery. The standard must require, where appropriate, the collection and validation of traditional fisher and community knowledge to support implementation of EAF.

#### ■ **AKRFM**

The proposed changes represent an increase in the level of minimum requirements (However this is a supplementary requirement which Alaska RFM has not previously met, and therefore does not affect the ability of the programme to continue to be GSSI recognised).

#### ■ **GSSI response**

Based on the Public Consultation comments, no change has been made.

This is a Supplementary Component, not an Essential Component. The change was made following internal feedback based on past experience with Benchmark Processes. The change is made to the Guidance, not the Component text, and therefore it is not considered to change to the minimum requirement.

### **GSSI Supplementary Component D.3.02.02**

**Component text:** The standard requires the management system to ensure that available traditional, fisher and community knowledge about the ecosystem and the fishery of which the unit of certification is part is collected and validated to contribute to implementation and monitoring of EAF. Further, information about the local situation should be complemented by information from ecologically similar situations elsewhere.

**Guidance text:** The focus of this Supplemental Component is the broad data and information needs of EAF. In countries where these needs cannot be met through reports and statistics from various research institutes, agencies and ministries, there is often extensive traditional knowledge about the ecosystem and the fishery. The standard must require, where appropriate, the collection and validation of traditional fisher and community knowledge to support implementation of EAF.

### **REFERENCES**

FAO Technical Guidelines for Responsible Fisheries. 4. Fisheries management. 4.2. The ecosystem approach to fisheries (2003); 2.

## **ESSENTIAL COMPONENT D.5.10**

### ***Component text***

The standard recognizes management measures commonly used in small scale fisheries can achieve adequate levels of protection for stocks in the face of uncertainty about the state of the resource and that a past record of good management performance could be considered as supporting evidence of the adequacy of the management measures and the management system.

#### **■ AKRFM**

The proposed change represents an increase in the level of minimum requirements, as it is a new clause. The Alaska RFM may meet this through clause 5.1.1, "Less elaborate stock assessment methods are frequently used for small-scale or low-value capture fisheries resulting in greater uncertainty about the status of the stock under consideration., A more precautionary approach to managing fisheries on such resources shall be required, including, where appropriate, a lower level of resource utilization. A record of good management performance may be considered as supporting evidence of the adequacy of the management system". However, as this is an essential clause, further consideration is necessary to ensure the programme is in alignment.

#### **■ GSSI response**

Based on the Public Consultation comments, no change has been made.

Regarding the increase in the level of minimum requirements, the same could be said of new Essential Components D.2.09 (Management Objectives) and D.4.11 (Assessment Methodologies). There are three New Essential Components, all of which relate to Small Scale and/or data limited Fisheries that were addressed in the original Benchmark, but not as fully as they could have been. The original Benchmark has D.1.09, which states: "The standard is applicable to governance and management systems for small

scale and/or data limited fisheries, with due consideration to the availability of data and the fact that management systems can differ substantially for different types and scales of fisheries.”

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

**Component text:** The standard recognizes management measures commonly used in small scale fisheries can achieve adequate levels of protection for stocks in the face of uncertainty about the state of the resource and that a past record of good management performance could be considered as supporting evidence of the adequacy of the management measures and the management system.

**Guidance text:** This Essential Component derives from paragraph 32 of the Marine Ecolabelling Guidelines. It cuts across the other components covering management measures and seeks recognition within the certification scheme that less sophisticated management measures commonly used in small scale fisheries can still achieve adequate protection of stocks, providing uncertainty is properly addressed. The scheme could, for example, accept a past record of good outcomes under such management measures as evidence of their adequacy.

### **REFERENCES**

FAO Marine and/or Inland Guidelines for Ecolabelling 32.

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,

**Eva van Heukelom**

Technical Manager