

Haarlem, 4th of November 2021

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Dear Juliana,

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 **Fair Trade USA** 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 20th 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:

EWG: Expert Working Group
EC: Essential Component
SC: Supplementary Component

▪ **Section A Governance**

SUPPLEMENTARY COMPONENT A.1.08.01

Component text

The Scheme Owner has a documented monitoring and evaluation system through which it collects data on its performance indicators, and uses this to inform the revision of its standard.

Guidance text

The Scheme Owner has a documented system to monitor and assess its defined performance indicators. Monitoring information is shared with the standards committee.

Examples of evidence for scheme alignment:

- Monitoring system including data collected
- Previous monitoring information has been assessed and documented inputs developed for the next standard revision process.

▪ **FAIR TRADE USA**

Why was ISEAL removed?

▪ **GSSI response**

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

ISEAL was removed to not make differentiation between ISEAL Members and others.

GSSI Supplementary Component A.1.08.01

Component text: The Scheme Owner has a documented monitoring and evaluation system through which it collects data on its performance indicators, and uses this to inform the revision of its standard.

Guidance text: The Scheme Owner has a documented system to monitor and assess its defined performance indicators. Monitoring information is shared with the standards committee.

Examples of evidence for scheme alignment:

- Monitoring system including data collected
- Previous monitoring information has been assessed and documented inputs developed for the next standard revision process.

REFERENCES

ISEAL Impacts Code 5.1, 8.2, 9.1.

ESSENTIAL COMPONENT A.3.23

Component text

The Scheme Owner shall make translations of the standard into English and in the most relevant/appropriate languages, to ensure access and transparency, freely available and authorizes translations into other languages where necessary for credible implementation of the standard.

Documents translated shall include standard setting procedures, most recent work program, draft and final versions of the standard.

▪ **FAIR TRADE USA**

The sentence in the Component is confusing. Is the goal that the scheme owner translates the documents into all relevant languages and ensures they are available to those who need them? Or is it saying that the scheme owner should translate the documents, but also allow for others to translate the documents into other languages? If the latter is true, this could result in translations that have mistakes in the intent of the original language. There may be quality issues and errors in translations that the organization cannot control if others are doing the translations.

▪ **GSSI response**

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

The need for translation into other languages has been deleted, as well as the requirement of translation of documents other than the standard itself.

Translations will be made under the responsibility of the Scheme Owner.

GSSI Essential Component A.3.23

Component text: The Scheme Owner shall make translations of the standard into English and in the most relevant/appropriate languages, to ensure access and transparency, freely available ~~and authorizes translations into other languages where necessary for credible implementation of the standard.~~

~~Documents translated shall include standard setting procedures, most recent work program, draft and final versions of the standard.~~

Guidance text: The Scheme Owner has a mechanism in place to identify the applicability and need for translations based on geographical scope of certification, as well as the geographical range of certified entities and products.

The process includes an assessment in order to ensure accurate translation.

Examples of evidence for scheme alignment:

- Internal procedure, quality handbook, current language availability, work plan of translations, process for ensuring accuracy of translations.

REFERENCES

Adapted from FAO e 53 [75]

ISEAL Standard Setting Code 5.7.3

ESSENTIAL COMPONENT A.3.25

Component text

The Scheme Owner requires that the certified entities are given a period of at most three years to come into compliance with revised fishery standards and at most one year for revised aquaculture standards.

Guidance text

Certified entities are given sufficient time to come into compliance with revised standards, for fisheries – at most 3 years and at least one year for revised aquaculture standards.

Examples of evidence for scheme alignment:

- Standards, certification requirements/methodologies which state minimum transition period for revised standards.

▪ **FAIR TRADE USA**

Why are the timelines different for aquaculture and fisheries? How does this relate to ISEAL requirements?

▪ **GSSI response**

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

The decision was made to keep the requirement as it was in Benchmark Framework v1.0, as no consensus was reached on change. The Component follows the timelines as set out in the FAO guidelines.

GSSI Essential Component A.3.25

Component text: The Scheme Owner requires that the certified entities are given a period of **at least three years** to come into compliance with revised fishery standards and **at least one year** for revised aquaculture standards.

Guidance text: Certified entities are given sufficient time to come into compliance with revised standards, for fisheries – **minimum 3 years and at least one year for revised aquaculture standards.**

Examples of evidence for scheme alignment:

- Standards, certification requirements/methodologies which state minimum transition period for revised standards

REFERENCES

FAO 60 [82].

▪ Section D – Fisheries

ESSENTIAL COMPONENT D.1.03

Component text

The standard requires that the fishery management organization or arrangement receives and responds to in a timely manner the best scientific evidence available regarding the status of the stock under consideration and the likelihood and magnitude of adverse impacts of the unit of certification on the stock under consideration and the ecosystem.

Guidance text

Best scientific evidence available is described in the Glossary. For the stock under consideration it can derive from assessments of stock status outside of what is regarded as a traditional “stock assessment”, accommodating techniques for data limited fisheries and including traditional knowledge, providing its validity can be objectively verified. The actions of the fishery management organization or arrangement in both receiving and responding to the best scientific evidence available must be in accordance with the Precautionary Approach (D.3.12). This Essential Component is also linked to those in D.4 that cover the collection and handling of data and information.

▪ Fair Trade USA

This is a requirement saying that the Fishery management organization has scientific evidence available and shares it. How does the scheme owner control this? It seems like this requirement is out of scope of what a standard/scheme owner would ask a UoC.

▪ GSSI response

Based on the comment from Fair Trade USA, the Guidance text has been changed.

Additional text has been added to the Guidance text to explain the inclusion of all aspects of stock status and fishery impacts, due to the component being about taking into account the best scientific evidence by the Fishery Management Organization in a timely manner. The availability and use of best scientific evidence available is a cornerstone of the CCRF (Paragraph 6.4, General Principles) and the Ecolabelling Guidelines. Fishery certification standards should reflect this requirement to be in accordance with the CCRF.

GSSI Essential Component D.1.03

Component text: The standard requires that the fishery management organization or arrangement receives and responds to in a timely manner the best scientific evidence available regarding the status of the stock under consideration and the likelihood and magnitude of adverse impacts of the unit of certification on the stock under consideration and the ecosystem.

Guidance text: This essential component is about the taking into account of the best scientific evidence available by the Fishery Management Organization in a timely manner. This relates to both stock status and fishery impacts; hence all are mentioned in the component language. Best scientific evidence available is described in the Glossary. For the stock under consideration it can derive from assessments of stock status outside of what is regarded as a traditional “stock assessment”, accommodating techniques for data limited fisheries and including traditional knowledge, providing its validity can be objectively verified. The actions of the fishery management organization or arrangement in both receiving and responding to the best scientific evidence available must be in accordance with the Precautionary Approach

(D.1.06). This Essential Component is also linked to those in D.3 that cover the collection and handling of data and information.

REFERENCES

FAO Marine and/or Inland Guidelines for Ecolabelling 28 (35); 29.1 (36.1); 29.2 (36.2); 29.3 (36.4)

SUPPLEMENTARY COMPONENT D.1.09.03

Component text

The standard requires that the Management System recognizes and takes into account the differential impact of natural and human-induced disasters and climate change on small-scale fisheries, where appropriate, and develops policies and plans to address climate change in fisheries, in particular strategies for adaptation and mitigation, as well as for building resilience.

Guidance text

This Supplementary Component expands on its parent Essential Component by focusing specifically on the need to recognize and mitigate the impacts of natural and human-induced disasters and climate change on small scale fisheries, including the development of policies and plans.

The "where appropriate" language is for cases where certification schemes do not have small scale fisheries within their geographic area of applicability.

▪ **Fair Trade USA**

What is the rationale behind only considering climate change effects and resilience of small-scale fisheries? Why are medium and larger scale fisheries not covered as well?

▪ **GSSI response**

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

The Supplemental Component sits under an Essential Component that deals specifically with the management of small-scale fisheries, per the FAO Guidelines, hence why this is addressing only those fisheries. While it is not within the scope of this revision to add Essential Components on climate change, it has been flagged to the GSSI Steering Board to consider for a future revision.

GSSI Supplementary Component D.1.09.03

Component text: The standard requires that the Management System recognizes and takes into account the differential impact of natural and human-induced disasters and climate change on small-scale fisheries, where appropriate, and develops policies and plans to address climate change in fisheries, in particular strategies for adaptation and mitigation, as well as for building resilience.

Guidance text: This Supplementary Component expands on its parent Essential Component by focusing specifically on the need to recognize and mitigate the impacts of natural and human-induced disasters and climate change on small scale fisheries, including the development of policies and plans.

The "where appropriate" language is for cases where certification schemes do not have small scale fisheries within their geographic area of applicability.

REFERENCES

FAO Voluntary Guidelines for Securing Sustainable Small-Scale Fisheries in the Context of Food Security and Poverty Eradication (2014); 9.2.

ESSENTIAL COMPONENT D.2.02

Component text

The standard requires that the management objectives clearly define target and limit reference points, or proxies for the stock under consideration on the basis of the best scientific evidence available and in accordance with the Precautionary Approach. Target reference points must be consistent with achieving Maximum Sustainable Yield, MSY (or a suitable proxy) on average and limit reference points (or proxies) must be consistent with avoiding recruitment overfishing or other impacts that are likely to be irreversible or very slowly reversible.

▪ **Fair Trade USA**

Seafood Watch, based on the newest scientific evidence, has moved away from using exclusively MSY given that this reference point is not always the best because of resilience of the species.

▪ **GSSI response**

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

This Component is not revised at this time. The guidance from FAO with respect to MSY remains as it was at the time of the original drafting of the Benchmark, hence there is currently no basis for making a change.

GSSI Essential Component D.2.02

Component text: The standard requires that the management objectives clearly define target and limit reference points, or proxies for the stock under consideration on the basis of the best scientific evidence available and in accordance with the Precautionary Approach. Target reference points must be consistent with achieving Maximum Sustainable Yield, MSY (or a suitable proxy) on average and limit reference points (or proxies) must be consistent with avoiding recruitment overfishing or other impacts that are likely to be irreversible or very slowly reversible.

Guidance text: The Glossary provides descriptions of target and limit reference points. Reference points must be set at levels consistent with achieving maximum sustainable yield (MSY) (or a suitable proxy) on average, or a lesser fishing mortality if that is optimal in the circumstances of the fishery (e.g. multispecies fisheries) or to avoid severe adverse impacts on dependent predators. To be effective, reference points must be incorporated within a framework of decision rules (See D.5.02) to ensure that the stock does not fall below a limit, Blim, at which recruitment could be significantly impaired, or lead to average recruitment that is significantly lower than it would be with a higher stock biomass. The level of Blim should be set on the basis of historical information, applying an appropriate level of precaution according to the reliability of that information. In addition, an upper limit should be set on fishing mortality, Flim, which is the fishing mortality rate that, if sustained, would drive biomass down to the Blim level.

A proxy is a surrogate or substitute approach that results in acceptable outcomes consistent with the primary approach. In the context of reference points, when data are insufficient to estimate reference

points directly other measures of productive capacity can serve as reasonable substitutes or “proxies”. Suitable proxies may be, for example, standardized CPUE as a proxy for biomass or specific levels of fishing mortality and biomass which have proven useful in other fisheries and can be used with a reasonable degree of confidence in the absence of better defined levels. It is important to note that the use of a proxy may involve additional uncertainty, and if so, should trigger the use of extra precaution in the setting of biological reference points. The words “or proxies” are a consideration for small scale and/or data limited fisheries, This should not be interpreted to mean that small scale and/or data limited fisheries do not require target and limit reference points, but that the methods used to develop them and monitor the stock status in relation to them may be less data intensive than for large scale fisheries. See also Essential Components D.1.04 and D.5.04.

REFERENCES

FAO Marine and/or Inland Guidelines for Ecolabelling 29.2 (36.2); 29.6 (36.7)

ESSENTIAL COMPONENT D.2.04

Component text

The standard requires management objectives that seek to ensure that catches and discards by the unit of certification of stocks other than the stock under consideration and any associated culture and enhancement activity do not threaten those stocks with recruitment overfishing or other impacts that are likely to be irreversible or very slowly reversible.

Guidance text

This Essential Component covers "non-certified catches" which is everything other than the stock under consideration.

This Essential Component is explicitly and deliberately confined to the effects of non-certified catches and discards by the unit of certification on those non-certified species/stocks. Cumulative effects on non-certified species/stocks are not included in the Ecolabelling Guidelines. They are not part of the Essential Components, but they are covered in the Supplemental Components. The part of the component relating to enhancement activity may be "not applicable" to schemes that explicitly do not cover enhanced fisheries.

Examples of irreversible or very slowly reversible effects on bycatch species include excessive depletion of very long-lived organisms (see Glossary). To mitigate effects that are likely to be irreversible or very slowly reversible requires those effects to be made less severe such that they are no longer likely to be irreversible or very slowly reversible.

▪ **Fair Trade USA**

The term "non-certified catches" is a new terminology which is not being used by any of the main scheme owners. Introducing a new term to the space may be confusing and it might be better to align with what is already being used. In general, the industry is already trying to harmonize language, creating a new term will move us away from this goal.

▪ **GSSI response**

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

The term "non-certified catches" is used deliberately to avoid an existing confusion. The previous term was "non-target catches", which has created confusion, because it is used differently by schemes (e.g. MSC) and fisheries generally. As noted in the GSSI Benchmark Glossary, the OECD definition of non-

target catch is "Species for which the gear is not specifically set, although they may have immediate commercial value and be a desirable component of the catch". Fish certification schemes use the term target catch to mean the catch of stock under consideration by the unit of certification; hence anything other than this catch is "non-target catch" in their parlance. There are plenty of examples where a non-target catch (by the OECD definition) is certified. Hence the term "non-certified catches" agreed by the FGT is more accurate and avoids confusion. This term has been added in the GSSI Glossary.

GSSI Essential Component D.2.04

Component text: The standard requires management objectives that seek to ensure that catches and discards by the unit of certification of stocks other than the stock under consideration and any associated culture and enhancement activity do not threaten those stocks with recruitment overfishing or other impacts that are likely to be irreversible or very slowly reversible.

Guidance text: This Essential Component covers "non-certified catches" which is everything other than the stock under consideration.

This Essential Component is explicitly and deliberately confined to the effects of non-certified catches and discards by the unit of certification on those non-certified species/stocks. Cumulative effects on non-certified species/stocks are not included in the Ecolabelling Guidelines. They are not part of the Essential Components, but they are covered in the Supplemental Components. The part of the component relating to enhancement activity may be "not applicable" to schemes that explicitly do not cover enhanced fisheries.

Examples of irreversible or very slowly reversible effects on by-catch species include excessive depletion of very long-lived organisms (see Glossary). To mitigate effects that are likely to be irreversible or very slowly reversible requires those effects to be made less severe such that they are no longer likely to be irreversible or very slowly reversible.

REFERENCES

FAO Marine and/or Inland Guidelines for Ecolabelling 28.2 (35.2); 31.1 (41.1)

ESSENTIAL COMPONENT D.2.09

Component text

The standard requires that management objectives for the unit of certification and the stock under consideration take into account the interests of fishers engaged in subsistence, small-scale and artisanal fisheries, where appropriate.

Guidance text

This Essential Component derives from paragraphs 7.2.1 and 7.2.2 of the CCRF. It cuts across the other components covering management objectives and looks for the requirement to take into account the interests of fishers engaged in small scale and artisanal fisheries in the development of these objectives.

Section 7.2 of the CCRF is titled "Management Objectives". Paragraph 7.2.1 of the CCRF calls for the adoption of appropriate measures (not objectives), based on the best scientific evidence available, which are designed to maintain or restore stocks at levels capable of producing maximum sustainable yield, as qualified by relevant environmental and economic factors, including the special requirements of

developing countries. Paragraph 7.2.2 states that such measures should provide that the interests of fishers, including those engaged in subsistence, small-scale and artisanal fisheries, are taken into account. While this language refers specifically to "measures", the need for objectives for those measures is implied, particularly given the text is in section 7.2 which is titled "Management Objectives".

The "where appropriate" language is for cases where certification schemes do not have small scale fisheries within their geographic area of applicability.

- **Fair Trade USA**

I fear the guidance here is far too vague. It says that their 'interests' must be 'taken into account' but does not provide any additional guidance on what this might look like. This is a similar kind of issue with the degree to which indigenous cultures must be 'consulted' on resource management, but consultation is not defined well and leaves room for these groups to be exploited and under-represented. While the intent here is spot on, there should be guidance that speaks to the rigour with which GSSI expects this requirement to be met. Additionally, the applicability is not well-defined in the component.

- **GSSI response**

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

This Essential Component should be read in conjunction with the other Essential Components covering small-scale and/or data limited fisheries. Collectively they provide a guide as to how these fisheries should be managed across the Performance Areas D.2 to D.5. Unfortunately, there is little additional specificity in the CCRF (e.g. paragraph 7.7.2 simply states the requirement that "the interests of fishers, including those engaged in subsistence, small-scale and artisanal fisheries, are taken into account). The main goal here is to ensure that these fisheries are not marginalized or excluded by certification schemes.

GSSI Essential Component D.2.09

Component text: The standard requires that management objectives for the unit of certification and the stock under consideration take into account the interests of fishers engaged in subsistence, small-scale and artisanal fisheries, where appropriate.

Guidance text: This Essential Component derives from paragraphs 7.2.1 and 7.2.2 of the CCRF. It cuts across the other components covering management objectives and looks for the requirement to take into account the interests of fishers engaged in small scale and artisanal fisheries in the development of these objectives.

Section 7.2 of the CCRF is titled "Management Objectives". Paragraph 7.2.1 of the CCRF calls for the adoption of appropriate measures (not objectives), based on the best scientific evidence available, which are designed to maintain or restore stocks at levels capable of producing maximum sustainable yield, as qualified by relevant environmental and economic factors, including the special requirements of developing countries. Paragraph 7.2.2 states that such measures should provide that the interests of fishers, including those engaged in subsistence, small-scale and artisanal fisheries, are taken into account. While this language refers specifically to "measures", the need for objectives for those measures is implied, particularly given the text is in section 7.2 which is titled "Management Objectives".

The "where appropriate" language is for cases where certification schemes do not have small scale fisheries within their geographic area of applicability.

REFERENCES

FAO CCRF 7.2.2(c)

SUPPLEMENTARY COMPONENT D.2.09.01

Component text

The standard requires that management objectives for the unit of certification and the stock under consideration promote the contribution of small-scale fisheries to an economically, socially and environmentally sustainable future for the planet and its people.

Guidance text

This Supplementary Component builds on its parent Essential Component by focusing on the contribution of small-scale fisheries to an economically, socially and environmentally sustainable future for the planet and its people.

▪ **Fair Trade USA**

The current wording is confusing, however the intent of this component is good. It should be focused on the economic contribution of the fishing activity on the stock by small scale fisheries. This should also be considered in management objectives.

▪ **GSSI response**

Based on the comment of Fair Trade USA, the Guidance text has been changed.

The Guidance has been developed further based on the FAO Small Scale Fisheries Guidelines.

GSSI Supplementary Component D.2.09.01

Component text: The standard requires that management objectives for the unit of certification and the stock under consideration promote the contribution of small-scale fisheries to an economically, socially and environmentally sustainable future for the planet and its people.

Guidance text: This Supplementary Component builds on its parent Essential Component by focusing on the contribution of small-scale fisheries to an economically, socially and environmentally sustainable future for the planet and its people. *While the language of the Component is very broad in scale, the standard needs to show a specific focus on the economic contribution of fishing activity on certified stocks by small scale fisheries. In practical terms, this is likely to include participatory assessment methodologies that allow a better understanding and documentation of the true contribution of small-scale fisheries to sustainable resource management for food security and poverty eradication.*

REFERENCES

FAO Voluntary Guidelines for Securing Sustainable Small-Scale Fisheries in the Context of Food Security and Poverty Eradication (2014); 1.1(d).

ESSENTIAL COMPONENT D.3.03

Component text

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

▪ **Fair Trade USA**

Same comment about the use of a new terminology for non-certified species/catch and creating more confusion in the space

▪ **GSSI response**

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

Please see the response for D.2.04.

GSSI Essential Component D.3.03

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

Guidance text: Adequate, reliable and current data and/or other information is described in the Glossary. In general these are data which are commensurate with the development and delivery of the best scientific evidence available. The requirements for data collection are focussed on the need to assess the effects of the unit of certification on non-target stocks. Non-certified catches and discards refers to species/stocks that are taken by the unit of certification other than the stock for which certification is being sought (see Glossary).

The adequacy of data relates primarily to the quantity and type of data collected (including sampling coverage) and depends crucially on the nature of the systems being monitored and purposes to which the data are being put. Some analysis of the precision resulting from sampling coverage would normally be part of an assessment of adequacy and reliability. The currency of data is important *inter alia* because its capacity for supporting reliable assessment of current status and trends declines as it gets older. Adequate, reliable and current data and/or other information can include relevant traditional, fisher or community knowledge, provided its validity can be objectively verified (i.e. the knowledge has been collected and analysed through a systematic, objective and well-designed process, and is not just hearsay).

The requirements for data collection in this Essential Component are focussed on the effects of the unit of certification on non-certified species/stocks. Non-certified catches/stocks are described in the Glossary. Catches of Endangered species are covered in Essential Component D.3.04.

Applicable international standards and practices include the output of the Coordinating Working Party on Fishery Statistics (CWP) and the FAO Guidelines for the routine collection of capture fishery data (1998) FAO Fisheries Technical Paper. No. 382.

REFERENCES

FAO Marine and/or Inland Guidelines for Ecolabelling 31.1 (41.1).

ESSENTIAL COMPONENT D.4.06

Component text

The standard requires an assessment of the extent to which 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 stocks with recruitment overfishing or other impacts that are likely to be irreversible or very slowly reversible.

▪ **Fair Trade USA**

The component language is confusing. Consider deleting "...of stocks other than the stock under consideration" and replace by saying "non-certified catches" at the beginning of sentence.

▪ **GSSI response**

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

This form of words is also used in D.5.04 and D.2.04 and was agreed earlier by the EWG in response to previous comments. It's about assessment (D.4.06) and management (D.5.04) to meet objectives (D.2.04) for impacts on species/stocks other than the stock under consideration (see D.6.05 regarding the use of "species/stocks").

GSSI Essential Component D.4.06

Component text: The standard requires an assessment of the extent to which 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 stocks with recruitment overfishing or other impacts that are likely to be irreversible or very slowly reversible.

Guidance text: This is the partner Essential Component of D.3.03 that 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. Non-target catches and discards refers to species/stocks that are taken by the unit of certification other than the stock for which certification is being sought (see Glossary).

This Essential Component addresses the need for standards to require an assessment to support the achievement of management objectives specified in Essential Component D.2.06. This Essential Component is explicitly and deliberately confined to the effects of non-target catches and discards by the unit of certification on those non-target species/stocks. Cumulative effects on non-target species/stocks are not included in the Ecolabelling Guidelines. They are not part of the Essential Components, but they are covered in the Supplemental Components. The component relating to enhancement activity may be "not applicable" to schemes that explicitly do not cover enhanced fisheries. Non-target catches/stocks are described in the Glossary.

Examples of irreversible or very slowly reversible effects on bycatch species include excessive depletion of very long-lived organisms (see Glossary).

REFERENCES

FAO Marine and/or Inland Guidelines for Ecolabelling 28.2 (35.2); 31.1 (41.1)

ESSENTIAL COMPONENT D.4.11

Component text

The standard does not preclude small scale fisheries from possible certification for ecolabelling due to the use of less elaborate methods of stock assessment.

▪ **Fair Trade USA**

Is there any intent on developing components for small scale fisheries? Or guidelines/acceptable practices for these groups?

▪ **GSSI response**

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

Several Components for small-scale fisheries have been developed in this review. Regarding guidelines/acceptable practices, this is for the schemes to develop, not the GSSI Benchmark.

GSSI Essential Component D.4.11

Component text: The standard does not preclude small scale fisheries from possible certification for ecolabelling due to the use of less elaborate methods of stock assessment.

Guidance text: This Essential Component derives from paragraph 32 of the Marine Ecolabelling Guidelines. Specifically, that paragraph deals with the ways in which certification standards address the use of less elaborate methods of stock assessment in small scale fisheries, noting that with higher uncertainty more precautionary approaches to managing fisheries on such resources will be required which may necessitate lower levels of utilization of the resource.

REFERENCES

FAO Marine and/or Inland Guidelines for Ecolabelling 32

ESSENTIAL COMPONENT D.5.04

Component text

The standard requires that management measures are designed to achieve management objectives (see D.2.04) seeking to ensure that catches and discards by the unit of certification of stocks other than the stock under consideration and any associated culture and enhancement activity do not threaten those stocks with recruitment overfishing or other impacts that are likely to be irreversible or very slowly reversible.

▪ **Fair Trade USA**

The component language is confusing. Consider deleting "...of stocks other than the stock under consideration" and replace by saying "non-certified catches" at the beginning of the sentence.

▪ **GSSI response**

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

This form of words is also used in D.4.06 and D.2.04 and was agreed earlier by the EWG in response to previous comments. It's about assessment (D.4.06) and management (D.5.04) to meet objectives (D.2.04) for impacts on species/stocks other than the stock under consideration (see D.6.05 regarding the use of "species/stocks").

GSSI Essential Component D.5.04

Component text: The standard requires that management measures are designed to achieve management objectives (see D.2.04) seeking to ensure that catches and discards by the unit of certification of stocks other than the stock under consideration and any associated culture and enhancement activity do not threaten those stocks with recruitment overfishing or other impacts that are likely to be irreversible or very slowly reversible.

Guidance text: This is the partner Essential Component of D.2.04. Non-target catches and discards refers to species/stocks that are taken by the unit of certification other than the stock for which certification is being sought (see Glossary). Examples of irreversible or very slowly reversible effects on bycatch species include recruitment overfishing or excessive depletion of very long-lived organisms. Management measures should mitigate effects that are likely to be irreversible or very slowly reversible by making those effects less severe such that they are no longer likely to be irreversible or very slowly reversible.

REFERENCES

FAO Marine and/or Inland Guidelines for Ecolabelling 28.2 (35.2); 31.1 (41.1)

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.

▪ **Fair Trade USA**

Is there any intent to develop components for Small Scale Fisheries? Orguidelines/acceptable practices for these groups?

▪ **GSSI response**

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

Several components for small scale fisheries have been developed in this review. Regarding guidelines/acceptable practices, this is for the schemes to develop, not the GSSI Benchmark.

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

ESSENTIAL COMPONENT D.6.05

Component text

The standard requires the existence of outcome indicator(s) consistent with achieving management objectives for species/stocks in the catches and discards by the unit of certification that are other than the stock under consideration (D.2.04).

▪ **Fair Trade USA**

Stock and species are being used interchangeably in this component, and in other places throughout the framework. This is very confusing as they are different things.

▪ **GSSI response**

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

It is well understood that stock and species are not the same. The terms are being used together, not interchangeably. Where the issue is clearly stock related (e.g. for the stock under consideration) only the term stock is used. When covering the impacts of the unit of certification on everything other than the stock under consideration, the EWG has used "species/stock" to cover all kinds of impacts on all kinds of species, some of which may have a well-defined stock structure and some of which may not.

GSSI Essential Component D.6.05

Component text: The standard requires the existence of outcome indicator(s) consistent with achieving management objectives for species/stocks in the catches and discards by the unit of certification that are other than the stock under consideration (D.2.04).

Guidance text: The relevant management objectives are those referred to in Performance Area 2 and are for non-certified species/stocks. The outcome indicators should be consistent with demonstrating that the management objectives (D.2.04) have been effectively achieved. Non-certified catches refers to species/stocks that are taken by the unit of certification other than the stock for which certification is being sought (see Glossary).

Examples of irreversible or very slowly reversible effects on bycatch species include excessive depletion of very long-lived organisms (see Glossary). To mitigate effects that are likely to be irreversible or very slowly reversible requires those effects to be made less severe such that they are no longer likely to be irreversible or very slowly reversible.

REFERENCES

FAO Marine and/or Inland Guidelines for Ecolabelling 28.2 (35.2); 31.1 (41.1); 40 (51)

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,

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