

Haarlem, 8th of November 2021

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Dear Laura,

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 **Audubon Gulf United for Lasting Fisheries** 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

ESSENTIAL COMPONENT A.3.01

Component text

The Scheme Owner shall have a process and governance structure in place for standard setting, reviewing, revising, assessing, verifying and approving standards.

The process shall be carried out with the participation of technically competent persons (e.g. independent experts, suitably qualified representatives of all key stakeholders).

The information about the process and organization for standard development and revision shall be made publicly available.

It is the Scheme Owner responsibility to ensure a balanced participation by stakeholders.

▪ G.U.L.F.

Undefined and broad terms 'technically competent persons' and 'suitably qualified representatives of all key stakeholders' has potential to be problematic.

Lost wording from 3.06.01 'ensures participation...is open to all stakeholders,' and loses clarity that it must be open to but does not require participation from all stakeholders.

Rationale notes addition of 3.03 but not 3.06.01.

We can't make a decision on supporting this without clarity on the terms being proposed.

▪ GSSI response

Based on G.U.L.F.'s comments, the Component text has been changed.

The phrase "and open to" has been added to the Component text to allow for more flexibility.

GSSI Essential Component A.3.01

Component text: The Scheme Owner shall have a process and governance structure in place for standard setting, reviewing, revising, assessing, verifying and approving standards. The process shall be carried out with the participation of technically competent persons (e.g. independent experts, [and open to suitably qualified representatives of all key stakeholders](#)). [The information about the process and organization for standard development and revision](#) shall be made publicly available.

It is the Scheme Owner responsibility to ensure a balanced participation by stakeholders.

Guidance text: The Scheme Owner clearly identifies the responsible person for assigning the management of the standard setting process.

In addition, the procedure, organizational chart or related TORs/contracts with external bodies identifies where each of the tasks (setting, reviewing, revising, assessing, verifying and approving standards) are assigned to. This documentation clearly indicates where the overall responsibility for the standard setting process lies.

Procedures defining the process of standard development and revision are easily available for the public, such as online, in appropriate languages.

REFERENCES

FAO clauses 44 and 45 [68-69].

SUPPLEMENTARY COMPONENT A.3.06.01

Component text

Deleted, included in A.3.01

▪ **G.U.L.F.**

As noted in 3.01, lost language causes less clarity.

▪ **GSSI response**

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

The deletion is considered to improve the efficiency and ease of the Benchmark Framework and will therefore be kept as proposed.

GSSI Supplementary Component A.3.06.01

Component text: Deleted, included in A.3.01

Guidance text: Deleted, included in A.3.01

ESSENTIAL COMPONENT A.3.13

Component text

The Scheme Owner allows a period of at least 60 days for the submission of comments on the draft standard.

Guidance text

The Scheme Owner has a mechanism in place to assure a minimum of 60 days for comments on the draft standard.

A Standard is considered to be a set of documents that provide rules and guidelines to achieve results and that include all normative documents used for the certification process.

This includes standard governance and setting procedures, requirements for certification bodies and certified entities

Examples of evidence for scheme alignment:

- Internal procedure/quality handbook defining public comment period.
- ToR

Review previous comments and dates for submission on draft standards.

▪ **G.U.L.F.**

Needs clarity on whether all revisions of all normative documents require comment periods. Do minor changes (e.g. updating committee memberships in operations manual) require public comment? If so, then we do not agree with a 60-day comment period for minor changes.

▪ **GSSI response**

Based on G.U.L.F.'s comments, the Guidance text has been changed.

The new phrasing of the Guidance text allows the Scheme Owner to define what constitutes major changes of standards that consequently need to be submitted to public consultation.

GSSI Essential Component A.3.13

Component text: The Scheme Owner allows a period of at least 60 days for the submission of comments on the draft standard.

Guidance text: The Scheme Owner has a mechanism in place to assure a minimum of 60 days for comments on **major changes** of the draft standard.

A Standard is considered to be a set of documents that provide rules and guidelines to achieve results and that include all normative documents used for the certification process. This includes standard governance and setting procedures, requirements for certification bodies and certified entities

Examples of evidence for scheme alignment:

- Internal procedure/quality handbook defining public comment period.
- ToR

Review previous comments and dates for submission on draft standards.

REFERENCES

FAO 57 [79].

ESSENTIAL COMPONENT A.3.14

Component text

No later than the start of the comment period, the Scheme Owner publishes a notice announcing the period for commenting in a national or, as may be, regional or international publication of standardization activities and/or on the internet.

Guidance text

Timely announcements are made regarding the public comment period in appropriate channels so that they are easily available to relevant stakeholders. This can be online and in an appropriate publications. Dates should be clearly stated.

Examples of evidence for scheme alignment:

- Internal procedure defining process.
- Previous announcements are dated and were published before the beginning of the comment period.
- Newsletters
- Record of publication on SO's website

■ **G.U.L.F.**

Does 'and' mean both are required or does 'can' imply either one or both are acceptable? If the latter, not sure the meaning has changed and better clarity should be provided if a change has occurred.

■ **GSSI response**

Based on G.U.L.F.'s comments, the Guidance text has been changed.

The word "and" has been replaced with "and/or" to provide clarity that either option can be pursued, or both.

GSSI Essential Component A.3.14

Component text: No later than the start of the comment period, the Scheme Owner publishes a notice announcing the period for commenting in a national or, as may be, regional or international publication of standardization activities and/or on the internet.

Guidance text: Timely announcements are made regarding the public comment period in appropriate channels so that they are easily available to relevant stakeholders. This can be online [and/or](#) in an appropriate publications. Dates should be clearly stated.

Examples of evidence for scheme alignment:

- Internal procedure defining process.
- Previous announcements are dated and were published before the beginning of the comment period.
- Newsletters
- Record of publication on SO's website

REFERENCES

FAO 57 [79].

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.

■ G.U.L.F.

Need clearer definition on what is a stakeholder that is not well represented and small-scale before making a decision on this change.

■ GSSI response

Based on GULF's comments, the Component and Guidance text has been changed.

The Scheme Owners need to identify only the impacted stakeholders. Not well represented or small-scale stakeholders, are those impacted stakeholders that may be disadvantaged, not taken into consideration sufficiently.

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].

ESSENTIAL COMPONENT A.3.16

Component text

The Scheme Owner makes publicly available all comments received in the consultation respecting personal data protection.

▪ **G.U.L.F.**

What does personal data protection mean and how does it differ from non-attributable? Need better definitions before making a decision on this change.

▪ **GSSI response**

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

Personal Data Protection seems a more understandable vocabulary than “non attributable” and aligned with recent regulations evolution.

GSSI Essential Component A.3.16

Component text: The Scheme Owner makes publicly available all comments received in the consultation respecting personal data protection.

Guidance text: All comments received during the public comment period are made publically available without attribution or identifier.

Examples of evidence for scheme alignment:

- Internal procedure/quality handbook describing policy, current or past public comment comments posted online.

REFERENCES

FAO 57, 58, 61 [76, 77, 83].

■ Section B – Operational Management

ESSENTIAL COMPONENT B.2.16

Component text

The Scheme Owner clearly defines the criteria relating to the classification of non-conformities. Where the Scheme Owner allows for certification of an entity with non-compliances, the Scheme Owner requires that:

- Only non-conformities on minor, non-critical issues are allowed;
- A timeline for closing out corrective actions must be defined;
- A system to verify that corrective actions have been closed out is in place.

■ G.U.L.F.

This proposed change appears to be the same as the current component.

■ GSSI response

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

The changes were made to correct typos (from excel file, no space between "non-critical issues", "action must be", "actions have been").

GSSI Essential Component B.2.16

Component text: The Scheme Owner clearly defines the criteria relating to the classification of non-conformities. Where the Scheme Owner allows for certification of an entity with non-compliances, the Scheme Owner requires that:

- Only non-conformities on minor, non-critical issues are allowed;
- A timeline for closing out corrective actions must be defined;
- A system to verify that corrective actions have been closed out is in place.

Guidance text: The Scheme Owner defines the criteria related to rating the severity of non-conformities for certification bodies. If Scheme allows for certified entities with non-compliances, these can only be (All must be met): minor/non-critical, with a defined timeline for closing out and a mechanism defined to verify resolution.

Examples of evidence for scheme alignment:

- Contract/agreement between the Scheme Owner and the certification body, certification requirements/methodologies specifying classifications of non-conformities and conditions for allowing certification with non-compliances.
- Guidance specifying procedures and process for classifying nonconformities and conditions for issuing certification, audit reports.

REFERENCES

Not specifically defined in the FAO Guidelines, however considered key component for impartial and accurate certification as required in paragraph 107 [128].

This requirement ensures that there is a clear path for enterprises to remediate any non-compliances in a timely manner in line with ISO-17065 8.7.

■ Section D – Fisheries

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.

■ **G.U.L.F.**

Definition of what qualifies as small-scale/subsistence/artisanal is lacking. It is difficult to discern how and when this applies within the region covered by our RFM program without clarity. We can't agree to the addition of this component until it is clarified.

- **GSSI response**

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

Small-scale fisheries were covered in the first version of the Benchmark Tool and this term is already included in the Glossary. There is no intention in this review to change the way this term is used in the Benchmark Tool. This new Essential Component is covering management objectives for small-scale fisheries but it is not expanding the scope or definition of what small scale fisheries are considered to be. The definition of what qualifies as small-scale / subsistence / artisanal is to be found in the Glossary and also in the source FAO documents from which this Essential Component is derived. This is where the Independent Experts would find the necessary definitions when assessing whether a scheme meets this Essential Component.

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.

- **G.U.L.F.**

Same as above. In addition this component is very vague. How would a scheme verify this? Would recommend more developed guidance.

- **GSSI response**

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

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

Regarding the definition of small-scale fisheries: see response for D.2.09.

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)

SUPPLEMENTARY COMPONENT D.3.02.01

Component text

The standard requires that the management system collects and analyses data necessary to ensure that all operational objectives, indicators and reference points required for implementation of EAF can be assessed and monitored

- **G.U.L.F.**

Why is there a rationale for change but no change listed?

- **GSSI response**

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

This is a change to the original Rationale for inclusion as a GSSI Supplementary Component (not a change to the Component or its Guidance) that originated from the internal “bug list” prior to public comment. The changed language was shown in the rationale for change column because there was no separate column for changes to the rationale for inclusion as a GSSI Supplementary Component.

GSSI Supplementary Component D.3.02.01

Component text: The standard requires that the management system collects and analyses data necessary to ensure that all operational objectives, indicators and reference points required for implementation of EAF can be assessed and monitored

Guidance text: This Supplementary Component creates a blanket requirement for the data and analyses necessary to determine the extent to which operational objectives for implementing EAF have been met.

REFERENCES

FAO Technical Guidelines for Responsible Fisheries. 4. Fisheries management. 4.2.The ecosystem approach to fisheries (2003) 2.2

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.

- **G.U.L.F.**

Same as previous comment on the need for a clearer definition of small scale fisheries.

- **GSSI response**

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

Regarding the definition of small-scale fisheries: Same response as for D.2.09

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.5.10

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.

- **G.U.L.F.**

Same as previous comments on defining small scale fisheries.

- **GSSI response**

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

Regarding the definition of small-scale fisheries: same response as for D.2.09.

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