

Meeting with MSC on April 24th in Brussels



Our Deep Concern Regarding the Marine Stewardship Council (MSC) Certification Process

On behalf of the undersigned conservation and animal protection organizations and the millions of citizens which support them worldwide...



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1. Our requests stated in the open letter by all co-signing NGOs
2. Minimum information and principles required for future assessments
3. Stakeholders' engagement within the assessment and certification process
4. Non-engagement in assessment of Echebatar fishery

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1. Our requests, as stated in the open letter by all co-signing NGOs

- That MSC forbids the entry of fisheries involving the catch of top-predators while using non-discriminatory methods, and fisheries involving the deliberate encirclement of cetaceans, in the full evaluation
- That MSC includes IUCN-listed fish species in the definition of ETP species in V2.0 of the MSC standard
- That MSC modifies its standard prior to the next scheduled review in 2019 so that it addresses adequately all cumulative impacts - fishery and environmental - on target, bycatch and ETP species
- That vessels and processors that engage in commercial whaling be excluded from certification or re-certification

2. Minimum information and principles required for future assessments

- No business relationship of CAB with fishery – payment of CAB only from a common fund
- Complete AIS data and/or VMS data provided in the desk review report at least for the last 2 years
- Mandatory “bycatch log” at the point of catch, detailing species and numbers for observed and not observed sets alike, for at least the last 2 years.
- Bycatch calculated as a percentage of the quantity of UoA caught per set and not as percentage of the total catch
- If percentage of UoA in the total catch is less than 80% such fishing methods or fisheries must not be considered for certification
- The percentage of bycatch for sharks, rays, marine mammals, and ETP species needs to be defined based on actual stock assessments and has to consider the cumulative impact of all MSC certified fisheries in the same FAOs. The fishery must demonstrate progressive reductions in bycatch prior to and between reassessments, with a defined aim to minimise (i.e. to ultimately reduce to zero) anthropogenic removals

3. Stakeholders' engagement within the assessment and certification process

- Pre-notification time period of at least 6 weeks for upcoming certifications
- At least 3 months for stakeholders to file concerns or to provide other input based on the CAB's desk review report.
- Stakeholder assessment of report possible prior to the publication of the CAB's recommendation for certification or for a conditional certification
- NGOs need to be provided with the opportunity to participate in site visits free of costs with travel expenses covered by CAB or MSC fund
- Full reimbursement of all costs for all successful objections made by stakeholders

4. Non-engagement in assessment of Echebatar fishery

- No robust stock assessments are available for a significant part of the annual catch of primary main and primary minor species, and especially the special concern minor species
- Insufficient data from observed sets is available to evaluate the impact of the disputable FAD fishing method onto P2 and P2 Pis
- No meaningful AIS data and no VMS data were provided despite the international obligations to have these data
- Species of special concern or ETP species have not even been logged at point of catch, except when sets are observed. Observation has occurred at an alarmingly decreasing extent during 2016
- Number of observed sets has dramatically dropped in 2016 while the use of FAD sets and the quantity of catch has further increased
- Justified indication that the reported numbers of bycatch during observed sets in 2016 are not representative as they clearly not in line with statistical expectations
- AIS documented indication, that fishing activities have been taking place outside the claimed FAOs
- Inadequate reference to literature with regard to the estimated survival rates of involuntarily caught and released sharks
- None of the justified objections from the previous assessment have been addressed or resolved

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Summary

- We believe that by certifying fisheries without considering their wider environmental impact and conduct, MSC undermines public confidence in its certification program as a reliable environmental certification standard.
- As consumers look to the MSC “brand” to help them make informed seafood purchasing decisions, our organizations believe that they should be made aware of the fact that an MSC certification does not indicate the absence of shark and cetacean bycatch.
- Therefore, we request an update to the standards and process for certification and to introduce additional pre-requisites, which must be demonstrated by each fishery seeking certification.

.... otherwise we feel we can no longer support the image of sustainability for MSC products