



Public Consultation Comment Responses

IFFO RS V.20 Standard – Full Draft

On the **16th January 2017** IFFO RS put forward the full draft of the proposed IFFO RS Standard Version 2.0 for 60 day public consultation.

All comments from Stakeholders and interested parties were greatly appreciated and taken into consideration in the development of Version 2.0 of the IFFO RS standard. Below is a breakdown of the comments received for both the factory and fishery clauses of the proposed standard together with the stakeholder proposal (if provided) and the response from IFFO RS.

Factory clause comments and responses:

| Clause | Stakeholder Comment | Stakeholder Proposal | IFFO RS Response |
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| 1.2 | Responsible Sourcing Policy This part states that the applicant must implement a "documented policy" that commits them to the responsible supply of raw fish. A standard format should be recommended for the development of a "documented policy". | In point 1.2 (Responsible supply policy) it would be desirable for a standard format to be drawn up and to be annexed, as should be a "Documented policy". | For discussion |
| 1.4.2 | Correct weighing of raw material is an important and integral part of sustainability and IFFO RS should be able to verify that a kilo is always a kilo. If cheating on the weight becomes revealed it will seriously jeopardize the thrust worthiness of the whole IFFO RS standard | All whole fish fishery landings discharged to the Applicant shall be weighed, recorded and documented by third party surveyor | No Changes – In the last TAC meeting (9 th Dec 2016) it was agreed to put the word verified instead of narrow it to 3 rd party surveyor. Verified should include 1 st , 2 nd and 3 rd party inspections that will weigh, record and document the landings. |
| 2.1.5.1 | Customers buying fishmeal operate with a mass balance. For example, 75% of the fish meal can be IFFO RS and 25% not IFFO RS. ASC allows and approves mass balance in fish | An example, landings from the central Baltic Sea can be mixtures of sprats and herring for example 75 % sprat and 25 % herring – | No Changes – In the last TAC meeting (9 th Dec 2016) it was discussed that allowing to do a mass balance |



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| | feed and IFFO RS should also allow and approve mass balance in fishmeal and fish oil. | sprat has IFFO RS but herring do not have IFFO RS. In this case 75 % of the fishmeal should be IFFO RS and 25 % without IFFO RS. When herring gets IFFO RS or MSC 100 % of the fishmeal is IFFO RS certified. Hence it should be allowed to have a mass balance on fishmeal and fish oil. | will allow fishmeal plants to use fish that comes from a fishery that is not assessed, in some cases this can be an irresponsible or unsustainable fishery or may allow the use of endangered species into the production. It was agreed not to introduce Mass Balance into the standard. |
| 2.1.5.1 | This section states that applicants must have a system to ensure that compliance with the requirements of the production of marine ingredients is tracked to the approved fishery raw material. They must implement procedures that demonstrate that the raw fishery does not come from IUU fishing. In general, this part includes requirements that can be easily met and implemented. 2.1.5.1. Indicates that applicants must conduct a mass balance performance exercise every year to test and record the quantity of marine ingredients derived from each category of fishery raw material. | In section 2, responsible traceability (section 2.1.5.1), guidelines should be developed for mass balance to record the quantity of marine ingredients derived from each category of fishery raw material. | For discussion |
| 2.1.8 | Worth to mention that every time a Company finds traceability loss (ex, mixed IFFO RS with non IFFO RS) it should contact the certification body. However, if there has been more than one re-call, then a second audit must be required. | To indicate or request that at least 2 recall exercises per calendar year together with a full traceability exercise from the origin of the raw material to the client. | Accept comment – it is important to establish the time for these two re-calls to happen in order to be confident that another audit is necessary. <u>Addition of at least 2 re-call exercises together with the traceability</u> |



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| | | | <u>exercise will be discussed.</u> |
| 3.1.4 | Already in GMP B2 | Suggest to remove | Accept comment – remove clauses |
| 3.1.4.1 | Already in GMP B2 | Suggest to remove | Accept comment – remove clauses |
| 3.1.5 | Already in GMP B2 | Suggest to remove | Accept comment – remove clauses |
| 3.1.6 | Already in GMP B2 | Suggest to remove | Accept comment – remove clauses |
| 3.2.16.4 – 3.2.16.9 | Seems to be missing | Erase or add what is missing | Accept comment – numbering to be corrected |
| 5.8.1 | I suggest not to include the wording - “at least every 3 years or whenever necessary”- This means that it may never happen because it wasn’t necessary. | The employees have been informed about the self-declaration and it is revised annually or at least once every calendar year. | Accept comment – wording will be revised and reworded for better interpretation. |
| 5.14 | Needs more clarity | Provide more detail on what to do to fully comply with this clause. | Accept comment – wording will be revised and reworded for better interpretation. More details and guidance will be added |
| 6.4.1 | Review or explain the wording “demonstrate awareness” for a more quantifiable concept | You can ask for: Management should demonstrate awareness of the identified issues and should establish indicators or short term action plans (within the calendar year) in order to address the detected risks. | Accept comment – Guidelines will be included in the interpretation documents |

Fishery clause comments and responses:

| Clause | Stakeholder Comment | Stakeholder Proposal | IFFO RS Response |
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| <p>SPECIES CATEGORISATION - pg 5</p> | <p>This 95% is not clear to me. I feel this needs more clarification or a different wording. If you have two species Type 2 representing each 5% of the catch, you will never achieve 95% for Type 1 species. Or are you meaning that the first accumulated 95% of the catches, no matter if they are target or by-catch species would be Type 1, and the remainder mix of species accounting for 5% in total would be Type 2? In that case, if, for example, you are targeting three species which in total account for 92%, and then next in the list you have three species accounting in average for 1% each, you will consider these latter as type 1? If I understand the intention I could suggest a new wording.</p> | | <p>Accept comment (revise species categorisation wording)</p> <p>The explanation of the 95% rule for species categorising will be revised for clarity.</p> |
| <p>CATEGORY B SPECIES -If the biomass / fishing pressure risk assessment is not possible - pg 10</p> | <p>Why using this, when it would be easy to conduct a PSA, which includes the intrinsic resilience AND the susceptibility, and it is a method that has proved to be conservative enough?</p> | | <p>No changes</p> <p>Category B species are those which make up a large proportion of landings but have no management regime. The PSA alone is not sufficient for these 'targeted' species. The PSA currently used (from the APFIC guidelines) does not take into account the status of the specific stock (although it does look at some fishery-specific characteristics); category B requires some minimal information about biomass and fishing mortality be known before the species can be approved and is therefore more conservative.</p> |
| <p>C1 - Species name pg 11</p> | <p>This is repeated</p> | | <p>Accepted comment</p> |



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| <p>Appendix B - Background on the 5% catch rule - pg 19</p> | <p>Please see my comments above. Now I understand the intention. It would be better to say that target species are those that, individually, account for more than X%. The remainder are all non-target. This concept is very different from those used by MSC and Seafood Watch. At the MSC a non-target species can be principal, but none target species can be minor. The danger here is that this X value will allow non-target species being assessed as a target one. Maybe the standard should not talk about TARGET and NON-TARGET but about PRINCIPAL and NON-PRINCIPAL, independently if they are target or not. Or the definition of target should be left to the fishery in assesment or to the client (that is what the MSC does, for example), and the auditor should decide if this definition is adequate or not, forgetting the 95-5%.</p> | | <p>Accept comment; conduct review of 95% rule by TAC</p> <p>As noted above, the wording for the species categorisation section, particularly the 95% rule, will be revised for clarity.</p> <p>The final recommendation of the comment, to allow applicants complete freedom to decide which species are included in which part of the assessment, will be considered by the TAC (note the consultation draft already allows applicants to decide which species make up the 95% - the removal of the %age restriction is the new proposal).</p> |
| <p>1.3.1.1</p> | <p>The word "customary" should be added. In my experience, IFFO standard should accept semi-self-regulated schemes as valid.</p> | | <p>Accept comment</p> <p>The word 'customary' will be added.</p> |
| <p>1.3.1.3</p> | <p>This concept should be expanded to the management framework, where the State is not able to develop a full management system but the fishers themselves complement it.</p> | | <p>Accept comment</p> <p>It will be clarified in the guidance that non-governmental solutions are acceptable.</p> |
| <p>1.3.2.3</p> | <p>IUCN evaluations are too general and often out of date. This should be replaced by stock assessment or risk assessment. The expression "none of the species caught" would include by-catch. Imagine a fishery that takes few endangered turtles along the fishing season. With this wording never would be</p> | | <p>Accept comment</p> <p>Fishery template will be re-worded to make clear that none of the species landed/used to make fishmeal/oil can be endangered.</p> <p>IUCN definitions are infrequently reviewed and</p> |



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| | IFFO certified. It should say: "none of the target species". | | generalised, and this is why Version 2 will also consider the CITES appendices. |
| | <p>In regard to Susceptibility/Availability, in my experience, a TIME OVERLAPPING should be considered as well, giving a weight to the closure seasons, even if the spatial overlapping is high.</p> <p>For example, if spatial overlapping is >30% but closure time is 50% or more, the risk could be 2 instead of 3.</p> <p>I understand your team had in mind mostly the trawling multispecies fisheries in Asia, but in Latin America we have some purse seine multispecies fisheries, such as Ecuador and Panama, with some closure measures in place, and using a PSA could be a way to get IFFO RS certified</p> | | <p>No changes</p> <p>The PSA used in the fishery assessment originates from the scientific literature. The detail of the PSA is therefore not decided by IFFO RS.</p> |
| 1.3.2.1.4 | This doesn't always occur in practice, if stock falls below LRP this would trigger HCR and tools that would result in a reduction of fishing effort to allow for stock recovery. Question for IFFO RS: do fishery closures following stock falling below LFP occur in practice? | | <p>No changes</p> <p>The harvest control rule is usually triggered at the target reference point. If fishing continues below the limit reference point, the fishery does not meet the IFFO RS requirements.</p> |
| 1.3.3 | Who is a fishery manager? Is this consistent in all fisheries? Different regional/national roles and functions may differ. | Could there be a more appropriate term for who is responsible for monitoring fishery impacts? | <p>Accept comment</p> <p>"Fishery manager" is used as shorthand for requiring that some part of the management system monitors the impacts of the fishery in various areas and uses the</p> |



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| | | | information collected to inform management decisions. This will be revised to “The management system” to improve clarity. |
| 1.3.3.1 | In data-limited contexts this might be very difficult to quantify if a fishery places an ETP species at serious risk of extinction. | Precautionary approach should be applied when limited information or uncertainties exist. | Accept comment for future development The fishery assessment expands on this requirement, but a more detailed assessment of ETP impacts could be developed in a future version of the standard. The IFFO RS assessment already utilises the precautionary approach. |
| 1.3.2.1.4 and 1.3.2.2.1 | Minimum requirements refer to reference points or proxies, these clauses just refer to reference points. Both refer to Limit reference points, but 1.3.2.1.4 states biomass limit reference point and 1.3.2.2.1 states limit reference point. Inconsistency also reflected in minimum requirements (see points below), biomass LRP are not explicitly stated in Category A or C species but are considered in Category B species. | Check consistency through standard. | Accept comment Wording throughout standard will be reviewed to ensure consistency. |
| 1.3.2.3 and 1.3.3.1 | Definition of ETP species is not clear, clause 1.3.2.3 cites CITES and IUCN are these what will define ETP classification, or are these criteria determination that species would result in fishery failing assessment (see paragraph 4 in Species categorisation in Assessment Methodology). | Clarify ETP definition. | Accept comment An entry for ETP species will be added to the glossary. |



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| <p>Comment on IFFO RS Assessment Methodology & Template Report</p> | | | |
| <p>Type 1 species Appendix B</p> | <p>Species categorisation refers to Type 1 species as representing 95% of the catch or more. Appendix B explains this better by saying that the combined weight of Type 1 species must make up at least 95% of the catch, however in some fisheries there maybe catch proportions of species <5% but that in total make up more than 5% of the total catch. In these cases, where there are multiple non-target species, the 95% catch requirement (Type 1 species, clause 1.3.2.1) may not be applicable. By removing upper limit of 95% and rather requiring that species caught in >5% of total catch are classified as Type 1 species and any species caught <5% are classified as Type 2. This follows the MSC 'main' and 'minor' species classification in Principle 2.</p> | <p>See stakeholder comment adjacent for MSC proposal.</p> | <p>Accept comment; conduct review of 95% rule by TAC</p> <p>The explanation of the 95% rule for species categorising will be revised for clarity. The TAC will be asked to review the current species categorisation approach in the light of the consultation responses.</p> |
| <p>M1.3</p> | <p>What criteria need to be met by management organisations to show that there is real public commitment to sustainability?</p> | <p>Define criteria</p> | <p>No changes</p> <p>This is a requirement that the management organisation has publicly stated that they are committed to sustainability. The current definition fully reflects the requirement.</p> |
| <p>M1.5</p> | <p>What level of consultation would be considered appropriate to meet minimum requirements?</p> | <p>Define criteria</p> | <p>No changes</p> <p>This is a requirement that the management includes some form of consultation. The current</p> |



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| | | | definition fully reflects the requirement. |
| M2.3 | How would assessment team define substantial evidence of widespread non-conformity in the fishery and substantial evidence of IUU fishing? Standard clause 1.4.3 refers to IUU fishing. And clause 1.4.3.1 requires applicant to provide evidence that raw material does not come from vessels engaged in IUU activities. What level does IUU be considered at in this clause? the fishery level or the country level? | Provide more explicit requirement against IUU and non-compliance in the fishery. This could be done through normative guidance for the assessment team. | No changes IFFO RS uses a precedent-setting approach to defining criteria such as these. Version 2 will use the guidance developed using this approach by Version 1, and also continue to expand the guidance as exceptions and marginal cases are encountered. |
| A2 | Incorrect standard clause reference | Standard clause 1.3.2.1 | Accept comment Clause numbering will be reviewed. |
| A2.2 | Category A species reference need to manage to a reference point in A2.2, but then proceed to define minimum requirements against limit reference point in A3.2, A3.3 and A4.1 and target reference point in A4.1. | Be clear what reference points or proxies are required to meet minimum requirement for A2.2. The word 'a' before reference points suggests that one RP may be sufficient to pass this requirement. Ensure there is consistency across requirements. | Accept comment Section A requirements will be re-worded to ensure clarity. |
| A3 | Standard clause incorrect, 1.3.2.3 refers to ETP species | Standard clauses 1.3.2.1.3 and 1.3.2.1.4 | Accept comment Clause numbering will be reviewed. |
| A4.1 | Multiple requirements under one section in A4.1. Overlap with A3.3 for first option requirement in A4.1, stock falling below LRP would result in fishery closure. | Provide alternative minimum requirement(s) should a fishery fail to meet requirement 'stock is at or above target reference point. E.g. A4.1: The stock is at or above the target reference point' IF fail A4.1, THEN | Accept comment A4.1 will be re-worded for clarity. |



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| | | A4.2 The stock is currently above the LRP or proxy and there is evidence that a fall below the LRP would result in fishery closure. IF fail A4.2, THEN A4.3 The stock is currently estimated to be below the LRP or proxy, but fishery removals are prohibited. | |
| A4.1 | Use both fishery closure and fishery removals prohibited in A4.1. | If these terms mean the same thing, ensure consistent terms applied in requirements. | Accept comment “Fishery closure” will be changed to “fishery removals prohibited” for clarity. |
| A4 | Standard clause incorrect, 1.3.2.4 does not exist. | Standard clause 1.3.2.1.4 | Accept comment Clause numbering will be reviewed. |
| Category B species | Category B species make up >5% of the catch, will all species that fit into this category have reference points available to complete Table B(a)? Category A species are required to have reference points or proxies, but Table B(a) does not offer option of proxies. Does MSY need to be explicitly referenced for Category B species? Would target and limit reference points or proxies not suffice? | | No changes Section B sets out the minimum requirements for ‘non-managed’ stocks, which are intentionally more conservative than those for ‘managed’ Category A species. Not all Category B species will have estimates of F or B, and in many cases these will not be approved. Reference points are adopted by management organisations. MSY can be known without it being used as a formal reference point. |
| Category B species | More information on applying AFS resilience calculation and FishBase could be included, Appendix A includes a selected | | No changes The intention is that the resilience value can be |



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| | section of the paper, but could be better written as guidance for the assessment team. | | obtained from Fishbase, rather than calculated by the assessment team themselves. |
| B1 | Standard clauses do not all apply. | Standard clause 1.3.2.1 | No changes This section is as intended – Most of clause 1.3.2.1 and sub-clauses do not apply to Category B species. Category B is an assessment of “there shall be strong evidence that the fishery is not putting the species at risk of over-exploitation”. |
| C1 | Standard clauses do not all apply. C1 duplicated on page 11. | Standard clause 1.3.2.2 | No changes A stock meeting the Category C requirements will meet clause 1.3.2.2. |
| C1.1 | Category C1.1 refers to fishery removals being accounted for in stock assessment process for Category C species. This should be carried through to Category D1 and D4 species (currently included similar clause, but not the same intent in D4, but not D1). Would this clause be more appropriate incorporated into Management requirements (M clauses)? | Clarify intent of these clauses. See also general comment in tab 3 - use of terms stock assessment process and management process. | No changes Category D species are those without a stock assessment, so the Category D assessment cannot make requirements relating to stock assessments. |
| Category D species | Last bullet point refers to species listed IUCN Endangered or Critically Endangered and CITES appendices as per Species categorisation (page 5), these species should not be included in species categorisation as they are out of scope for the fisheries standard. | Remove reference to ETP species in Category D species. | No changes The “no ETP” rule is reiterated for clarity. |
| D1 | Standard clauses do not all apply. | Standard clause 1.3.2.2 | No changes Sections D1-D4 must be considered together to compare them to the standard. Category D |



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| | | | species are those without reference points, so the only clause which applies is 1.3.2.2.2. The purpose of section D is to assess this clause. |
| D4 | The use of the term Vulnerable non-target species or D1 is not clear. The term 'non-target species' is used in the species categorisation on page 5, Category C species, and in the Requirements for Certification document. | Define term non-target species and apply consistently in the fisheries standard. Define term Vulnerable. Distinguish these species from ETP species covered in F1 and those species excluded from scope (species listed IUCN Endangered or Critically Endangered and CITES appendices) | Accept comment The term “vulnerable non-target species” is used as a short-hand for “Category D species which have been scored as vulnerable and need to be assessed under table D4”. This section will be re-worded for clarity. |
| D4 | Standard clause does not all apply. | Standard clause 1.3.2.2 | No changes Sections D1-D4 must be considered together to compare them to the standard. Category D species are those without reference points, so the only clause which applies is 1.3.2.2.2. The purpose of section D is to assess this clause. |
| F1 | How does IFFO RS define ETP species? | Clearly define what IFFO RS defines as ETP species. MSC defines ETP species in v2.0 of the MSC Fisheries Standard as: - Species that are recognised by national ETP legislation - Species listed in binding international agreements - Any species out-of-scope for MSC | Accept comment An entry for ETP species will be added to the glossary. |



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| | | assessments (amphibians, reptiles, birds and mammals) that are listed on IUCN Redlist as vulnerable, endangered or critically endangered. | |
| F1.2 | Not clear how define 'substantial evidence' and 'significant negative effect' | Define criteria | <p>No changes</p> <p>IFFO RS uses a precedent-setting approach to defining criteria such as these. Version 2 will use the guidance developed using this approach by Version 1, and also continue to expand the guidance as exceptions and marginal cases are encountered.</p> |
| F2.2 | Not clear how define 'substantial evidence' and 'significant negative effect' | Define criteria | <p>No changes</p> <p>IFFO RS uses a precedent-setting approach to defining criteria such as these. Version 2 will use the guidance developed using this approach by Version 1, and also continue to expand the guidance as exceptions and marginal cases are encountered.</p> |
| F3.2 | Not clear how define 'substantial evidence' and 'significant negative effect' | Define criteria | <p>No changes</p> <p>IFFO RS uses a precedent-setting approach to defining criteria such as these. Version 2 will use the guidance developed using this approach by Version 1, and also continue to expand the guidance as exceptions and marginal cases are encountered.</p> |



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| <p>F3.3</p> | <p>What would the assessment team use to identify when a species plays a key role in the ecosystem?</p> | <p>Clearly define and provide guidance on how to assess what is meant by a species playing a key role in the ecosystem. E.g. The MSC applies the concept of Key Low Trophic Level species for small pelagic and other low trophic level fish species that have an important role in the ecosystem. Specific requirements are applied for key LTL species in the Standard, requiring stock management to account for the ecological role of the species in the ecosystem.</p> | <p>No changes</p> <p>IFFO RS uses a precedent-setting approach to defining criteria such as these. Version 2 will use the guidance developed using this approach by Version 1, and also continue to expand the guidance as exceptions and marginal cases are encountered.</p> |
| <p>1.3.2 Stock Assessment Procedures and Management</p> | <p>1.3.2.1 Species which together make up at least 95% of total landings by weight shall meet the following requirements, OR there shall be strong evidence that the fishery is not putting the species at risk of over-exploitation:</p> | <p>1.3.2.1 Species representing 10% or more of total landings by weight must meet the following requirements, OR there must be strong evidence that the fishery is not putting the species at risk of over-exploitation:</p> | <p>Accept comment; conduct review of 95% rule by TAC</p> |



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| <p>Species Categorisation</p> | <p>The following table should be completed as fully as the available information permits. All species regularly* caught in the fishery should be listed along with an estimate of the proportion of the catch each species represents. The species should then be divided into Type 1 and Type 2. Type 1 species must represent 95% of the total catch. Type 2 species may represent a maximum of 5% of the catch (see Appendix B).</p> | <p>The following table should be completed as fully as the available information permits. It is essential that any species regularly making up more than 10% of landings are included in the table. Species which make up between 0.1% - 10% of landings should be listed wherever possible. Species which make up less than 0.1% of landings do not need to be listed (NOTE: ETP species are considered separately). The table should be extended if more space is needed. Discarded species should be included when known. The 'stock' column should be used to differentiate when there are multiple biological or management stocks of one species captured by the fishery. The 'management' column should be used to indicate whether there is an adequate management regime specifically aimed at the individual species/stock. In some cases it will be immediately clear whether there is a species-specific management regime in place (for example, if there is an annual TAC). In less clear circumstances, the rule</p> | <p>Accept comment; conduct review of 95% rule by TAC</p> |
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| | | <p>of thumb should be that if the species meets the minimum requirements of clauses A1-A4, an adequate species-specific management regime is in place. The category of a species is determined by the other columns, as follows:</p> <p>Category A: More than 10% of landings, species-specific management regime in place.</p> <p>Category B: More than 10% of landings, no species-specific management regime in place.</p> <p>Category C: Less than 10% of landings, species-specific management regime in place.</p> <p>Category D: Less than 10% of landings, no species-specific management regime in place.</p> | |
| Category B Species | <p>CATEGORY B SPECIES</p> <p>Category B species are those which make up greater than 5% of landings in the applicant raw material, but which are not subject to a species-specific research and management regime sufficient to pass all Category A clauses. If there are no Category B species in the fishery under assessment, this section can be deleted. Category B species are assessed using a risk-based approach. The following process should be completed once for each Category B species.</p> | <p>CATEGORY B SPECIES</p> <p>Category B species are those which make up greater than 10% of landings in the applicant raw material, but which are not subject to a species-specific research and management regime sufficient to pass all Category A clauses. If there are no Category B species in the fishery under assessment, this section can be deleted. Category B species are assessed using a risk-</p> | <p>Accept comment; conduct review of 95% rule by TAC</p> |



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| | | based approach. The following process should be completed once for each Category B species. | |
| Category C Species | In a whole fish assessment, Category C species are those which make up less than 5% of landings, but which are subject to a species-specific management regime. In most cases this will be because they are a commercial target in a fishery other than the one under assessment. In a by-product assessment, Category C species are those which are subject to a species-specific management regime, and are usually targeted species in fisheries for human consumption. | In a whole fish assessment, Category C species are those which make up less than 10% of landings, but which are subject to a species-specific management regime. In most cases this will be because they are a commercial target in a fishery other than the one under assessment. In a by-product assessment, Category C species are those which are subject to a species-specific management regime, and are usually targeted species in fisheries for human consumption. | Accept comment; conduct review of 95% rule by TAC |
| Category D Species | In a whole fish assessment, Category D species are those which make up less than 5% of landings and are not subject to a species-specific management regime. In the case of mixed trawl fisheries, Category D species may make up the majority of landings. In a by-product assessment, Category D species are those which are not subject to a species-specific management regime. In both cases, the comparative lack of scientific information on the status of the population of the species means that a risk-assessment style approach must be taken. | In a whole fish assessment, Category D species are those which make up less than 10% of landings and are not subject to a species-specific management regime. In the case of mixed trawl fisheries, Category D species may make up the majority of landings. In a by-product assessment, Category D species are those which are not subject to a species-specific management regime. In both cases, the comparative lack of | Accept comment; conduct review of 95% rule by TAC |



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| | | scientific information on the status of the population of the species means that a risk-assessment style approach must be taken. | |
| 1.3.2 | 1.3.2.1 Species which together make up at least 95% of total landings by weight shall meet the following requirements, OR there shall be strong evidence that the fishery is not putting the species at risk of over-exploitation: | 1.3.2.1 Species representing 10% or more of total landings by weight must meet the following requirements, OR there must be strong evidence that the fishery is not putting the species at risk of over-exploitation: | Accept comment; conduct review of 95% rule by TAC |
| 1.3.1.2 | <p>This section includes item 1.3.1.2. which provides: "Management procedures and outcomes must be transparent and publicly available".</p> <p>We feel this rule is very important and necessary. However, we believe that public transparency and accessibility should be more widely applied, including not only the procedures and results, but also all the information, studies or knowledge in general that work as a basis for the assessment and management of the fisheries.</p> <p>We propose the following drafting: "The management procedures, outcomes, as well as any information, study or knowledge on which the evaluation and management of the fisheries are based must be transparent and publicly available."</p> | | <p>Decision by TAC</p> <p>The TAC will discuss the possibility of making this change.</p> |



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| <p>1.3.2</p> | <p>The comments we have are related to transparency and publicity of scientific information and the way to classify fisheries into different categories. These comments are developed in other sections of this document, specifically in "Species Categorization Methodology" and in "Fishery Management Framework and Procedures".</p> | | <p>No response required.</p> |
| <p>1.3.3</p> | <p>We feel it is necessary to be precise about what is meant by "physical environment" and "aquatic ecosystem". It is unclear whether, for example, communities are included, which do appear in version 1 of the IFFO RS standard. This precision is also necessary because the proposed "Fishery Assessment Report", in item F2, uses other concepts which are: habitat, seabed habitat and seabed. In item F3 of the same document, the concept "ecosystem" is used.</p> | | <p>Accept comment</p> <p>The terms "physical environment" and "aquatic ecosystem" will be clarified in the glossary.</p> |
| <p>Species Categorisation</p> | <p>The following table should be completed as fully as the available information permits. All species regularly* caught in the fishery should be listed along with an estimate of the proportion of the catch each species represents. The species should then be divided into Type 1 and Type 2. Type 1 species must represent 95% of the total catch. Type 2 species may represent a maximum of 5% of the catch (see Appendix B).</p> | <p>The following table should be completed as fully as the available information permits. It is essential that any species regularly making up more than 10% of landings are included in the table. Species which make up between 0.1% - 10% of landings should be listed wherever possible. Species which make up less than 0.1% of landings do not need to be listed (NOTE: ETP species are considered separately). The table should be extended if more space is needed. Discarded</p> | <p>Accept comment; conduct review of 95% rule by TAC</p> |



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| | | <p>species should be included when known. The 'stock' column should be used to differentiate when there are multiple biological or management stocks of one species captured by the fishery. The 'management' column should be used to indicate whether there is an adequate management regime specifically aimed at the individual species/stock. In some cases it will be immediately clear whether there is a species-specific management regime in place (for example, if there is an annual TAC). In less clear circumstances, the rule of thumb should be that if the species meets the minimum requirements of clauses A1-A4, an adequate species-specific management regime is in place. The category of a species is determined by the other columns, as follows:</p> <p>Category A: More than 10% of landings, species-specific management regime in place.</p> <p>Category B: More than 10% of landings, no species-specific management regime in place.</p> <p>Category C: Less than</p> | |
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| | | 10% of landings, species-specific management regime in place. Category D: Less than 10% of landings, no species-specific management regime in place. | |
| Species Categorisation | <p>TYPE 1 SPECIES (Representing 95% of the catch or more) Category A: Species-specific management regime in place. Category B: No species-specific management regime in place.</p> <p>TYPE 2 SPECIES (Representing 5% OF THE CATCH OR LESS) Category C: Species-specific management regime in place. Category D: No species-specific management regime in place.</p> | <p>TYPE 1 SPECIES (Representing 90% of the catch or more) Category A: Species-specific management regime in place. Category B: No species-specific management regime in place. TYPE 2 SPECIES (Representing 10% OF THE CATCH OR LESS) Category C: Species-specific management regime in place. Category D: No species-specific management regime in place.</p> | Accept comment; conduct review of 95% rule by TAC |
| Category B Species | <p>CATEGORY B SPECIES Category B species are those which make up greater than 5% of landings in the applicant raw material, but which are not subject to a species-specific research and management regime sufficient to pass all Category A clauses. If there are no Category B species in the fishery under assessment, this section can be deleted. Category B species are assessed using a risk-based approach. The following process should be completed once for each Category B species.</p> | <p>CATEGORY B SPECIES Category B species are those which make up greater than 10% of landings in the applicant raw material, but which are not subject to a species-specific research and management regime sufficient to pass all Category A clauses. If there are no Category B species in the fishery under assessment, this section can be deleted. Category B species are assessed using a risk-based approach. The following process</p> | Accept comment; conduct review of 95% rule by TAC |



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| | | should be completed once for each Category B species. | |
| Category C Species | In a whole fish assessment, Category C species are those which make up less than 5% of landings, but which are subject to a species-specific management regime. In most cases this will be because they are a commercial target in a fishery other than the one under assessment. In a by-product assessment, Category C species are those which are subject to a species-specific management regime, and are usually targeted species in fisheries for human consumption. | In a whole fish assessment, Category C species are those which make up less than 10% of landings, but which are subject to a species-specific management regime. In most cases this will be because they are a commercial target in a fishery other than the one under assessment. In a by-product assessment, Category C species are those which are subject to a species-specific management regime, and are usually targeted species in fisheries for human consumption. | Accept comment; conduct review of 95% rule by TAC |
| Category D Species | In a whole fish assessment, Category D species are those which make up less than 5% of landings and are not subject to a species-specific management regime. In the case of mixed trawl fisheries, Category D species may make up the majority of landings. In a by-product assessment, Category D species are those which are not subject to a species-specific management regime. In both cases, the comparative lack of scientific information on the status of the population of the species means that a risk-assessment style approach must be taken. | In a whole fish assessment, Category D species are those which make up less than 10% of landings and are not subject to a species-specific management regime. In the case of mixed trawl fisheries, Category D species may make up the majority of landings. In a by-product assessment, Category D species are those which are not subject to a species-specific management regime. In both cases, the comparative lack of | Accept comment; conduct review of 95% rule by TAC |



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| | | scientific information on the status of the population of the species means that a risk-assessment style approach must be taken. | |
| Management Framework | Sections M1.1 to M1.4 correspond to what is proposed in the new section 1.3.1. However, point M1.5 is not supported in the new text of the proposed standard. An equivalent standard existed in item 1.3.2.4 of the first version of the standard, but in the new version it was not in the text. If item 1.3.1 is amended in the way we proposed above, section M1.6 of the Fishery Assessment Report (page 6) should be also include, within the need for transparency and public disposition, any information, study or knowledge on which evaluation and management of fisheries is based. On the other hand, there is an error in the Standard Clauses quoted in the Fishery Assessment Report. Clause 1.3.1.4 should be deleted, as the new version of the standard eliminates, and be added clause 1.3.1.2 | | Accept comment Reference to the consultation process will be included in the standard text. |
| Clause A2 | In item A2.5. we estimate that the assessment should be public and free for all interested party and not only for the assessment team. | | Decision by TAC The TAC will discuss whether to make this change to the requirements. |
| | This section of the Fishery Assessment Report states as Standard Clause 1.3.2.2. However, since A Category species must account for more | | Accept comment Clause numbering will be reviewed. |



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| | than 5% of landings, in fact it corresponds to clause 1.3.2.1. | | |
| Clause A3 | It would be appropriate an explanation of what the phrase "which may include economic mechanisms" refers to. This section of the Fishery Assessment Report states as a Standard Clause 1.3.2.3, which is proposed to be deleted in this version, so it is necessary to quote Clause 1.3.2.1 instead. | | Accept comment Fishery assessment report will be re-worded for clarity. |
| Clause F2 | The terms "habitat", "seabed habitat" and "seabed" are used. However, clause 1.3.3.2., which is quoted as standard clause in the Fishery Assessment Report, uses the terms "physical surroundings" and "physical environment". Precision of these concepts seems to be necessary. | | Accept comment Fishery assessment report will be re-worded for clarity. |
| Clause F3 | The term "ecosystem" is used. However clause 1.3.3.3., which is stated as standard clause in the Fishery Assessment Report, uses the term "marine ecosystem". Precision of these concepts seems to be necessary. | | Accept comment Fishery assessment report will be re-worded for clarity. |