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Ecology Action Centre



September 9, 2015

Dear Paul Knapman,

Thank you for the opportunity to comment on the 4<sup>th</sup> annual surveillance audit of the *Canada Northern and Striped Shrimp Trawl Fishery*. The comments in this submission pertain to conditions in the seven certified SFAs related to Pls 2.4.1-3 and Pls 2.5.1-3 and the overall development of a Habitat Ecosystem Strategy for this fishery. While we commend the industry's work to develop the ***A (Partial) Habitat & Ecosystem Strategy for the Northern Shrimp Fishery*** (unpublished March 2015, here forward referred to as the 'Strategy'), we are concerned by the process of how the Strategy was developed and the lack of transparency and peer review of the information.

It is difficult to comment on whether the Strategy meets the requirements of the MSC performance indicators and conditions when the Strategy itself is an industry created implementation of a federal policy that was undertaken outside of any public process or review. As a result, the outcome of the Strategy is based on assumptions and information that have not been open to critique and therefore may not satisfy the conditions of the certification.

In preparation of our submission into the audit process we contacted yourself and the assessment team for clarification on some of these issues. Through these communications it became clear that our concerns and questions with the Strategy itself could not be addressed through the MSC audit process. By either accepting or rejecting the information presented the assessment team is taking on a role of that should be the purview of the regulatory agency, DFO.

Because the MSC audit process is not the place to have public process and peer review of the Strategy we are limiting our comments into this audit process to one simple request to the certification body.

Request: Intertek not close habitat related conditions related to PIs 2.4.1-3 and PIs 2.5.1-3 until the document “A (Partial) Habitat & Ecosystem Strategy for the Northern Shrimp Fishery” has been vetted through a public process as described in the [Policy for Managing the Impacts of Fishing on Sensitive Benthic Areas](#) and the [Sustainable Fisheries Framework](#).

Outstanding questions in the Strategy include the calculation of the footprint, spatial resolution of data used relative to scale of fishing gear, delineation of ecosystems, uncertainty, data deficiencies, cumulative impacts, time frame of data set and other pertinent information. We have attached a copy of the strategy with questions for consideration. Despite these questions, we are withholding judgment as to whether the Strategy is sufficient under the given circumstance.

The MSC process is not intended to be a place for peer review of scientific information underpinning what should be a public regulatory process. It is however a place where the certification body can request that “strategies” as requested per MSC conditions are developed in accordance to the policy framework of the regulatory body managing the fishery under certification. Requiring a vetted public peer review process would be in keeping with other SFA’s under MSC certification, in particular the Northern Gulf of St. Lawrence which has a public document associated with its habitat strategy (see [Canadian Science Advisory Secretariat Science Advisory Report 2012/054](#)).

Additionally, related processes to protect Vulnerable Marine Ecosystems within the NAFO Regulatory Area, including draft methodology for impact assessment as well as the development of habitat suitability models indicate that there is more information that should be brought to bear to fully assess the impacts of the Northern Shrimp fishery on sensitive benthic areas. There is an upcoming Canadian Science Advisory Secretariat meeting scheduled for [January 2016](#) to review the data available for delineation of sensitive benthic areas within Canadian waters. We feel that this is a much more transparent process through which Canadian scientists can advise on the extent and vulnerability of sensitive seafloor species, such as corals and sponges, which can inform an industry plan as part of MSC certifications.

It is important that the MSC Certification and meeting of conditions follow good public policy process, and do not set precedents that undermine the implementation of Canadian fisheries management policy.

Thank you for consideration of our input. Please contact us if you have further questions.

Sincerely,

A handwritten signature in black ink that reads "Scott Wallace". The signature is written in a cursive style with a prominent loop at the end of the last name.

Scott Wallace  
Senior Research Scientist  
David Suzuki Foundation  
SeaChoice Steering Committee

A handwritten signature in black ink that reads "Susanna P. Fuller". The signature is written in a cursive style with a long, sweeping underline.

Susanna Fuller  
Marine Conservation Coordinator  
Ecology Action Centre  
SeaChoice Steering Committee