

April 22, 2017

EAC input to P1 Harmonization second round of consultation

(For EAC record – Official input submitted through the MSC online survey)

Harmonization Option 1

Our main concern is that it limits the options for stakeholders to review, input, and object to the P1 scoring. The premise is that stakeholders would have had an opportunity to input or object to the P1 scoring in the 'first mover' fishery, however that assumes that stakeholders have the capacity to engage in every MSC fishery process. It takes a lot of time and capacity to engage in assessments and it is just not possible for stakeholders to be involved in every assessment even on the same fish stock. Stakeholders prioritize involvement in each process based on issues that may be about the target stock, but are also due to P2 or P3 concerns. In these cases, the stakeholder may not have followed the 'first mover' P1 scoring or not had the capacity to object at the time. Our key input for this option is that we are not comfortable limiting the capacity to object in the latter assessment.

Harmonization Option 2

We participated as stakeholders in the ICCAT swordfish stocks P1 harmonization pilot in 2016 and thought the option gave ample options for input from stakeholders. It would have been easier to input before the meeting if a document was provided with the PIs to be harmonized and a comparison table of pre-harmonization scores and scoring rationale. Instead, it took too much time for a stakeholder to compile this information from multiple assessment documents with different styles and versions. A pre-harmonization meeting document would help ensure relevant and focused comments.

We were also pleased to be able to comment on the outcome of the meeting before those scores were formally adopted.

Interestingly, though, the scores decided at the harmonization meeting were not actually adopted by all participants in the end. With one fishery CAB opting not to take on the outcome, that fishery has since withdrawn from MSC certification, and another CAB using new rationale at the next audit based partly on new information.

We support this option, however, agree with the consultation document that this option does not fully address some of the PIs that need to have flexibility in scoring under P1 as they are fishery or country specific.

Harmonization Option 3

Harmonization of some sort for P1 would make participating in assessments slightly easier for stakeholders if there was documentation readily available that brought together the



harmonized fisheries into one document for comparison and review. At the moment, with many fisheries in process, many documents to search for, and a cumbersome database that means they all need to be downloaded individually the logistics of keeping on top of even overlapping stocks and their current status in the MSC system is too time consuming.