

September 11, 2017

Mr Rupert Howse CEO  
Marine House  
1 Snow Hill  
London  
EC1A 2DH

Dear Mr. Howse,

We are pleased to provide you and, via this letter, all relevant MSC staff with an advance copy of SeaChoice's summary report titled *What's behind the label? Assessing the impact of MSC and ASC Seafood Certifications in Canada* as well as the final supporting Technical Report which was reviewed by MSC in draft form.

The SeaChoice Steering Committee appreciates MSC engagement during data collection and analysis, review of the technical report and submission of a detailed response. MSC's response is included as an Appendix to the technical report.

In both the summary and technical report, we found that MSC has indeed been a catalyst for some important changes in Canadian fisheries, particularly, as you note in your response, in improving the information and strategy used for managing target stocks as well as transparency and responsiveness to sustainability concerns. We see the uptake of MSC in Canadian fisheries as a positive shift in fishing industry engagement in sustainability issues and related market access.

However, our analysis also revealed some significant concerns in the application of the MSC Standard in Canada. As SeaChoice member organizations are primary stakeholders in Canadian fisheries – engaging in 74% of fisheries certifications - we hope that MSC will take our findings and concerns seriously. Our key concerns stem from our analysis of the outcomes of Principle 2 conditions and use of timeline extensions. Fishery impact on bottom habitat and ecosystem function and management of bycatch, retained species, and species-at-risk, are key issues SeaChoice, and other Canadian stakeholders, work to improve in our fisheries. Issues scored under Principle 2 of the MSC standard.

While, most fisheries in Canada are generally already following the basic best practices for target stock management and there is little outright IUU fishing, many of 'Principle 2' impacts remain unaddressed by Canadian policy and fisheries management. Therefore, ensuring fisheries follow current government or even international regulations will not bring the level of change needed. In fact, in the Canadian context, many of our MSC certified fisheries continue to be those with the greatest ecosystem impact.

As there remain significant concerns with many MSC fisheries, it is important to understand if MSC Principle 2 certification conditions are acting as an incentive to change fishing practices in a tangible way. This is especially relevant in Canada now that most fisheries already hold MSC certification and are past the 'pre-assessment' phase changes. As noted in your response to the report, we are aware that not all conditions of certification are designed to change fishing practice in a tangible way, however, our finding that only 15% of Principle 2 conditions led fishing practice change, gives us pause to consider if the level required by the MSC standard is sufficient. This

finding is also important for stakeholders weighing the costs and benefits of further engagement in the MSC assessment and audit processes.

Moreover, while all condition extensions and re-certification conditions we assessed, as noted by MSC in its response, are allowed under the Certification Guidelines, the fact that 80% of Canadian recertified fisheries continue to have conditions and that those conditions allow a further 2-4 years for completion, raises concerns about the flexibility built in the scheme. Upon close inspection, most of these re-certification conditions require very similar work to what the fisheries had to do to close previous conditions. Some are direct extensions of unfinished conditions. In it unclear why these fisheries are given 4 more years (in most cases) to make the necessary changes. With such a time lag for even minimal improvements, stakeholders are given pause to consider whether the MSC Standard are asking for enough from our developed world fisheries.

If, as stated by MSC, fisheries make the most changes while aiming for certification, we raise the concern that incidents of extensions and roll over of conditions, while all justified under the Guidance, may indicate that MSC is missing a crucial time to ensure changes actually happen – before these fisheries are certified. This is especially true, again, for Principle 2 issues that are harder to shift. Our concern about possible pre-mature certification stands.

We appreciate the changes to Principle 2 rolling out under the new Version 2.0 of the MSC Standard and know that MSC is always working to improve its Standards. While these changes are new, as of yet, global assessments using Version 2.0 scoring still seem to be falling short of best practices for tackling issues of cumulative impact to non-target species; recovery for species-at-risk; and reducing bottom habitat impact.

As noted in the MSC response to our report, *“The role of stakeholders in the MSC program is key to ensuring the program operates efficiently and can achieve the stated goals.”* We urge you to take to heart the frustrations and concerns voiced not only by SeaChoice, but other stakeholders in Canada as well as around the world, in regards to the application of and bar set by the MSC Standard. If we collectively to move the paradigm of fisheries management towards the internationally recommended systems of ecosystem based management, it is imperative that this is also incentivized by eco-certifications.

We are pleased to see upcoming changes that will streamline assessments and think these will make the process much more accessible for stakeholders. We continue to see MSC as colleagues in the work to improve fisheries globally. We look forward to meeting to further discuss our report and maintaining continued productive dialogue.

Sincerely,

SeaChoice Steering Committee



Susanna D. Fuller  
Ecology Action Centre



Karen Wrysten  
Living Oceans Society



Bill Wareham  
David Suzuki Foundation



David  
Suzuki  
Foundation