



**Feedback Received to the Fair Trade USA
Draft Capture Fisheries Standard
and Fair Trade USA Responses**

December 2014

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Introduction

A Thank You to Our Stakeholders

Fair Trade USA sincerely thanks all of our partners, colleagues, and stakeholders for providing important and thorough feedback. Without your commitment and diverse expertise, the Capture Fisheries Standard would not be as strong as it is today.

In addition, we would like to say a big thank you to the members of the Fishery Advisory Council who have provided their expertise, comments, and guidance from the beginning of this process:

Name	Organization
Amanda Lejbowicz	COBI (Mexico)
Blane Olson	Anova Seafood
Brad Spear	Sustainable Fisheries Partnership
Dick Jones	Resiliensea Group
Duncan Leadbitter	Marine Change
Dr. Eny Buchary	Stockholm Resilience Center
Fabian Mollet	Blueyou Consulting
Dr. Jorge Jimenez	MarViva (Costa Rica)
Meghan Jeans	New England Aquarium
Miguel Jorge	50-in-10 Collaborative
René Benguerel	Blueyou Consulting
Sian Morgan	SCS Global Services
Tim Fitzgerald	Environmental Defense Fund
Tobias Aguirre	FishWise

As the Capture Fisheries program grows, we will continue to monitor the Standard's implementation and impact and seek ways to improve it as necessary. We are deeply committed to delivering on our promise of empowerment, economic development, social responsibility, and environmental stewardship in global small-scale fisheries.

Background

Fair Trade USA (FT USA) published the draft Capture Fisheries Standard (version 1.0) in March, 2014 and requested stakeholder feedback through the end of May, 2014. We proactively reached out to seafood industry leaders, fishery conservation and marine certification experts, and environmental non-profits working on-the-ground in small-scale fisheries around the world.

We would like to thank the following organizations and companies who supported us by providing valuable written and/or verbal feedback:

- 50-in-10 Collaborative
- Anova Seafood
- Blueyou Consulting
- CapLog Group
- CeDePesca

- Comunidad y Biodiversidad (COBI)
- Conservation International
- Ecology Action Center
- Environmental Defense Fund
- FishWise
- Food and Agriculture Organization of the United Nations (FAO) – Asia-Pacific Fishery Commission Regional Consultative Forum Meeting Participants
- International Collaborating Centre for Aquaculture and Fisheries Sustainability (ICAFIS) in Vietnam
- Marine Change
- Marine Stewardship Council
- MarViva
- Masyarakat dan Perikanan Indonesia (MDPI)
- Monterey Bay Aquarium
- New England Aquarium
- North Atlantic Seafood
- ProChile
- Rare Conservation
- Resiliensea Group
- SCS Global Services
- Stockholm Resilience Center
- Sustainable Fisheries Partnership
- Tamatea Tairawhiti Limited
- University of Washington School of Marine and Environmental Affairs
- Waitt Institute
- Wild Salmon Center
- World Wide Fund for Nature (WWF):
 - WWF Coral Triangle Program
 - WWF International
 - WWF Malaysia
 - WWF Pakistan
 - WWF Philippines
 - WWF Thailand
 - WWF UK
 - WWF US
 - WWF Vietnam
 - WWF Small-Scale Fisheries Marine Action Plan (SSF MAP) Group (consisting of several of the above offices and WWF Madagascar, WWF Netherlands, WWF Coastal East Africa, WWF Mexico, WWF Australia, and WWF Japan)

Given this list, as well as the comments provided by the Fishery Advisory Council, we are satisfied with the breadth of sources from which we received feedback. The organizations listed above cover a wide geographic range and include both science and policy experts and practitioners. Many of these organizations work directly with fishermen and are able to provide insights into on-the-ground realities. Furthermore, as we continue to field test this program through the end of 2015 we will collaborate with fishermen themselves, ensuring their vital input continues to play a significant role. Although we received relatively little feedback

from seafood processors or importers/exporters¹ during the public comment period, this was anticipated as their expertise falls more in line with Fair Trade USA's Trade Standard.

The following outlines in detail the feedback we received and how we have addressed those comments in the final version of the Capture Fisheries Standard. A large majority of the comments we received were incorporated into the Capture Fisheries Standard, as indicated throughout the document by this symbol: ■ In addition, we have also revamped the Standard in a few significant ways:

- Updated the term “Market Access Partner” to “certificate holder” to increase clarity and ease of use. The definition for this term has not changed. The certificate holder is the legal organizational body responsible for ensuring all registered fishers are in compliance with the requirements in the Standard and which maintains financial responsibility for the Fair Trade program and audits. The certificate holder can be a seafood importer/exporter, processor, non-governmental organization, government entity, or the fishermen themselves, allowing increased flexibility given various supply chains and partnerships. The certificate holder must have the ability to directly communicate with the fishermen and their communities.
- Added the term “implementation partner”. For certificate holders who choose to work with a third-party contractor or implementation partner, an agreement of responsibilities (for instance a contract or a Memorandum of Understanding) should be in place that specifies which Fair Trade requirements are to be undertaken by which party.
- Reorganized parts of the Standard to reduce confusion, overlap, and redundancies. Although such changes are not documented within this report because they did not change the Standard in a material way, we are happy to provide details for anyone who wishes to delve further into such edits. Multiple edits were also made to the Capture Fisheries Glossary to better align the terms with internationally-agreed upon definitions.
- Updated the Standard to reflect recommendations that 100% of a certified fishery be comprised of small-scale fishermen rather than half.
- Tested the draft Standard in Indonesia. On-the-ground lessons learned from program implementation and the first audit were incorporated into the Standard, specifically concerning the order and timing of requirements.
- Increased the environmental rigor necessary to be certified as Fair Trade by incorporating comments from fishery scientists and managers on the Resource Management section of the Standard.

The revised Standard and its appendices, along with the accompanying compliance criteria and guidance are available for download on our [website](#). Additionally, Scientific Certification Systems (SCS), our certification partner and technical expert, will post the documents on the SCS website.

¹ In their role as the certificate holder, staff members and partners of Anova Food provided us with extensive feedback during our initial field testing on the Capture Fisheries Standard.

General Comments

General comments from stakeholders naturally fell into similar subject areas. In order to more efficiently respond to those comments, we have summarized and grouped feedback where appropriate. Feedback related to specific criteria is discussed within those sections.

Audit/Certification Process

Multiple stakeholders requested clarity concerning the audit and the independence of the certification process. As with all Fair Trade USA products, Fair Trade adheres to best practice tenets of certification programs, including ISEAL/ISO Standards. This includes working with independent, third-party certification bodies. For the Capture Fisheries program, we are working with SCS Global Services, an accredited third-party certification organization which conducts a wide range of environmental and sustainability certification audits worldwide, including both MSC seafood and Fair Trade USA farm audits. SCS auditors conduct annual onsite audits to determine compliance with the Standard. Although auditors may consult local stakeholders as part of the audit process, the audit itself is not open to the public.

Like Fair Trade's agriculture-based programs, the certificate holder is responsible for paying for the audit. For those who choose to work with an implementation partner, responsibility for financing the audit may be shared between the parties. During the initial field testing of the program we are fundraising grant money to help fisheries pay for their first audit.

Fair Trade certification for all products lasts for three years. Maintenance audits are conducted at least annually, and producer groups with significant non-compliance issues between re-certification years may have their certification suspended. If the non-compliance issues are resolved within the time period approved by the auditor, the suspension is lifted. Decertification will occur if non-compliance issues are not resolved. However, decertified producers may regain Fair Trade certification if a subsequent audit shows compliance with the Standard. Most Fair Trade producer groups continue to seek certification after their initial certification has been granted.

Unit of Certification

Multiple stakeholders also requested clarity around the unit of certification. Similar to the Marine Stewardship Council (MSC), the Fair Trade certificate covers a single fishery (versus the Fisher Association), as defined by FAO in terms of some or all of the following: "people involved, species or type of fish, area of water or seabed, method of fishing, class of boats and purpose of the activities." Depending upon the fishery, a single certificate may cover multiple gears and/or multiple species.

The certificate may or may not cover processing facilities depending upon the scope of the audit; this is defined within the Standard itself. Traceability throughout the supply chain is largely covered under Fair Trade USA's Trade Standard, available for download [here](#). Product traceability is also incorporated into the Capture Fisheries Standard.

Major Criteria Requirements

New England Aquarium and WWF provided comments on the criteria classified as "Major". Specifically, New England Aquarium stated:

"Additional "major" compliance criteria are needed. As it stands, the majority of the "major" requirements reside within the Resource Management section of the standard, and while we support these, there should be more in other sections of the standard. Sections 1.1 (The Market Access

Partner) and 4.5 (Occupational Health and Safety) lack any “major” requirements and standard 6 Trade Requirements, are lacking major requirements in most subsections.”

■ *FT USA Response:* We appreciate New England Aquarium’s view on classifying additional criteria as Major and have reviewed the Standard with this in mind. In doing so we upgraded an additional 14 criteria to Major, for a total of 54. Please note, all criteria, including non-Major criteria, must be met at all times (according to the year of certification). The classification of Major means that the consequences of non-compliance are especially severe, for instance it could mean an immediate suspension of the certificate. For any non-compliances, even with non-Major criteria, discovered during the audit, a corrective action plan is required, stating how and when the issues will be resolved. This plan must be approved by the certification body. New certificates will not be granted until the corrective action plan has been implemented, and existing certificates may be suspended until the corrective action plan is fully carried out.

Food Security

The issue of food security also came up in general comments. Specifically, concerns “that international market pressures might take fish as food away from communities who need fish as food and protein” were raised by the Ecology Action Center.

“A standard should be developed that ensures that fishers and communities engaged in the certification have adequate access to fish for food before and after the program starts and that the Certification is not changing their access to fish as food” (Ecology Action Center).

A stakeholder from the University of Washington also commented on food security, stating that “...as small-scale and artisanal fisheries transition to the global market, it’s important to consider how the fishers’ livelihoods will change. It is possible that fishers relied on these fisheries directly as a food source and transitioning to the global market may jeopardize their food security. The distribution of the increased profits of the certified fisheries must be monitored so that all participants are benefiting.”

■ *FT USA Response:* Fair Trade USA recognizes the need to ensure food security of the intended beneficiaries of the Fair Trade program. As with other Fair Trade products, our belief is that Fair Trade strengthens the food security of producers by increasing their income, allowing them to purchase more food or different types of food according to their needs and wishes. To highlight the concern, we have added the need to consider food security to the list of elements to be considered in the needs assessment under compliance criterion ECD – DM 1.2.

Market Demand

With respect to market demand, the Ecology Action Center stated that we must ensure Fair Trade certification does

“not [expand] a market for already overfished stocks. In some cases, the problem with finding markets for fish is not one of market access, but rather one of supply. Since improving the supply of wild fish often requires reduced fishing pressures, we are concerned that increased international market pressure will, in some cases, increase the strain on dwindling fish stocks.”

FT USA Response: This is an important point, and one we take seriously. The Capture Fisheries Standard specifically incorporates criteria concerning the health of fish stocks, with an eye toward improving sustainability. Although our goal is to increase the volume of Fair Trade fish sold in the market so as to deliver more benefits to small-scale fishers, we also recognize the need to balance demand with stock sustainability.

Other stakeholders were concerned there might not be enough demand. A stakeholder from the University of Washington asked:

“For a marketing scheme such as Fair Trade to succeed, it is important that there is a demand for fair trade seafood in the United States. Have studies been conducted to identify the level of demand for such products in the US?”

FT USA Response: Fair Trade USA has been discussing the potential for Fair Trade Certified™ seafood with multiple retailers for over a year, and interest for this product is high. Additionally, in the United States consumer awareness for the Fair Trade label is currently around 55%, and studies conducted for Fair Trade USA by the Natural Marketing Institute show the Fair Trade Certified™ label is approaching an awareness level similar to the Organic label.

Consultation with Fishermen

A few stakeholders expressed concern of the lack of direct consultation with fishing communities. As previously stated, as we continue to pilot the Standard through the end of 2015 we expect to work directly with the fishermen involved, making sure their experiences and knowledge are incorporated into the program as appropriate. We are also in the process of developing an infographic specifically for fishermen that outlines the Standard. It will be translated into multiple languages and used for communication purposes.

In addition, the Ecology Action Center stated,

“We strongly recommend that there be fisher representation on the Fisheries Advisory Council.”

FT USA Response: Members of our Advisory Council directly engage with fishermen, and we have incorporated their expertise into this program. We agree a fisher representative would be best, but so far have been unable to identify fisher representatives who will be able to participate actively, due to language or time zone constraints. We welcome recommendations for fishermen to whom we should reach out.

Linking to Other Certification Programs

We also received comments discussing linkages with other seafood certification programs, specifically the Marine Stewardship Council (MSC). Throughout the process of developing the Standard Fair Trade USA has worked closely with both MSC and Monterey Bay Aquarium’s Seafood Watch program to find opportunities for collaboration. Discussions have centered on applying Fair Trade’s social criteria to fisheries already MSC certified, as well as developing a framework to help interested fisheries move from a Year 6 Fair Trade certification to MSC certification. The details of such a framework have yet to be finalized, but collaboration between the parties is ongoing.

Furthermore, we are open to working with MSC certified fisheries during our pilot testing period and are actively engaging stakeholders interested in this opportunity.

Guiding Documents

We received two comments on the inclusion of guiding documents while creating the Standard – specifically the United Nations Food and Agriculture Organization’s (FAO) *Voluntary Guidelines for Securing Sustainable Small-scale Fisheries in The Context Of Food Security and Poverty Eradication* and FAO’s guidelines for wild-capture fisheries.

FT USA Response: The FAO *Code of Conduct for Responsible Fisheries* (1995), the FAO *Guidelines for Ecolabelling of Fish and Fishery Products from Marine Capture Fisheries* (2009), the FAO-ILO *Good Practice Guide for Addressing Child*

Labour in Fisheries and Aquaculture, and the ICSF guidebook *Understanding the Work in Fishing Convention (C188)* were all used as guidance during the development of the Standard. We have updated the Standard to reflect the breadth of resources consulted during its development.

Governance

Feedback concerning governance and legal frameworks was also included. New England Aquarium stated: “Standards often begin with an overarching statement requiring the certificate holder to obey all national and international laws. Adherence to legal and regulatory frameworks are reflected within certain subsections of the FT USA criteria, but the criteria and standard would benefit from an overarching statement at the beginning of the document to reinforce and ensure legal compliance.”

■ *FT USA Response:* Rather than add a general statement about adherence to national and international laws, we have included individual compliance criteria to ensure specific laws are being followed (e.g., regulations concerning endangered, threatened, and protected species). This method decreases ambiguity and allows auditors to check specific criteria, thereby increasing the likelihood of finding non-compliance issues.

WWF had numerous comments on the lack of requirements for governance systems for Fair Trade fisheries, lack of integration with local governments and/or relevant departments and agencies, and lack of discussion of Regional Fishery Management Organizations (RFMOs).

FT USA Response: The Capture Fisheries Standard includes criteria around co-management procedures between the relevant regulatory body and the registered fishers. In some fisheries, the relevant regulatory body may be an RFMO. Cooperation between fishermen and government agencies often evolves over the course of many years; it is our aim that the Capture Fisheries program helps to create a framework for this to occur.

We acknowledge RFMOs may play a significant governance role in some fisheries; however, multi-national and international governance is not a primary focus of the Fair Trade program. For this reason, we have elected to not include language specifically concerning RFMOs in the Standard.

WWF also asked:

“What happens when national legislation (which is deferred to in some instances) differs from the environmental requirements? The cost for some fisheries in these cases may be lower than for others – is it then fair that some countries could incur lower costs due to lenient national regulations but are still awarded certification?”

■ *FT USA Response:* Throughout the Standard, when there is a difference between international or national legislation and the Capture Fisheries Standard, the Standard defers to whichever is more restrictive or rigorous. We have clarified this in the introduction to the scope of the Standard.

Additional General Comments

The following comments did not fall within the above subject areas and are therefore addressed here.

Monterey Bay Aquarium:

“I would support additional consideration of credit for MPAs [marine protected areas] which I believe are particularly valuable in small-scale or data-poor fisheries. SFW [Seafood Watch] does provide credit for MPAs in a few places in our criteria. For more you could also check out the recent paper in Plos Biology by Lester et al. and perhaps discuss with the authors how MPAs can be incorporated.”

FT USA Response: During the initial development of the Standard Fair Trade reviewed the article by Lester et al. and discussed incorporating MPAs. At this point in time the Standard is not built to provide additional credit for particular actions, although we are considering it for future iterations of the program. Regardless, we fully support the implementation of protected areas, and Fisher Associations are encouraged to create or maintain local MPAs as one strategy to safeguard fish stocks and ecologically important habitat. Furthermore, the habitat impact criteria incorporate the creation of protected areas as one form of mitigation against negative impacts from fishing gear.

New England Aquarium:

“In several instances there is a lack of agreement in the timing of implementation among indicators; for instance, year 0 criteria require certain things that may not be feasible until year 1 or later, or certain year 1 or 3 criteria may assist in implementation of year 0 criteria. We found this particularly to be the case in section 2.2 (EM-PTA) and section 5.1 (RM-IN).”

■ *FT USA Response:* Throughout the development of the Capture Fisheries program we strived to create an appropriate implementation timeline. However, learning by doing is always the ultimate test, and during our first audit we realized some criteria needed to be moved to a different audit year (e.g., criteria concerning the General Assembly were moved from Year 0 to Year 1). In addition, portions of the Standard, such as the EM – PTA section, have been reworked to increase clarity concerning timing of specific criteria.

Tamatea Tairawhiti Limited:

“Slavery at sea is the ultimate cost cutter and leads directly to IUU as anyone who will enslave another for profit cares even less for environmental rules. I suggest kill off the slavery first and guess what? Fisheries will rebound.”

■ *FT USA Response:* We agree slavery at sea is a significant problem; one of Fair Trade USA’s goals is to help eliminate slavery anywhere we work, whether on land or in the oceans. This can be seen in each of the social criteria within our programs’ Standards, especially in the ‘Freedom from Forced Labor’ section.

WWF:

“The social criteria are very ambitious and we fear that many fisheries/associations would not take the requirements seriously. The statement of working regardless of class, gender, etc. is good but this is extremely rare in all work environments worldwide. How will FT ensure that these requirements are actually met?”

FT USA Response: Fair Trade USA’s mission is to enable sustainable development and community empowerment. Rigorous social criteria play a large role in this endeavor, and while we understand the challenges for small producers in meeting them, we must include core minimum standards such as the ILO conventions securing Freedom from Discrimination. Fair Trade ensures the criteria are met by employing ground staff and utilizing rigorous annual audits.

“Subsidies are a huge issue and are not taken into consideration by the program; we suggest adding appropriate criteria.”

FT USA Response: Although we agree fishery subsidies are an issue, the Capture Fisheries program cannot tackle every global fishery management issue. Fair Trade USA has made several conscientious decisions to focus on specific core problems which we feel are well-suited to a consumer labeling model of citizen action. At the moment addressing government subsidies falls outside our scope of activities.

Programmatic Questions from Fair Trade

The four questions below were incorporated into the feedback form we provided commenters. The following is a summary of the responses we received to these questions.

Question 1

Is requiring a written agreement for share-catch systems reasonable?

The draft Capture Fisheries Standard allowed share-catch systems, where fishermen or workers could get paid a portion of the catch, as long as a written agreement was signed by all parties stipulating payment and working conditions. Many stakeholders highlighted the potential negative consequences of such a system, particularly with respect to Fair Trade USA's goals of empowerment, living wages, and environmental conservation. After careful review of the feedback and discussions with members of the Fishery Advisory Council, we have revised the stipulations regarding share-catch systems.

The finalized Standard requires that fishermen or workers be paid a portion of the market value of the landed catch in currency (rather than in-kind payments). A written, signed agreement stipulating payment and working conditions prior to fishing activity is required, and we have added guidance for instances where illiteracy may prove this to be difficult. Finally, acknowledging a need for accountability, we have added a criterion stipulating the share-catch agreement must be adhered to – this means that it will be verified by auditors.

Question 2

Given that our intended beneficiary of this Standard is small-scale and artisanal fisheries, do you think the Year 0 entry requirements are viable for them to achieve? Will it be necessary for them to have outside support to be able to meet these requirements?

The comments we received in response to these questions were overwhelmingly in agreement that fisheries will likely need outside support to meet the requirements, especially those laid out in the Resource Management section. We believe this will likely be the case as well and are ensuring the fisheries with whom we engage during field testing are coupled with a strong industry and/or non-profit partner organization. We have also updated the Standard to reflect the existence of both a certificate holder and an implementation partner or partners to assist with certification. Our hope is that as fisheries become certified within a region they can play a mentor role for other fishermen who would like to get involved with the Fair Trade program, easing the burden on outside support.

Although some stakeholders felt the requirements are too stringent, others believe they are not robust enough. Additional comments on this topic are covered in the next set of questions.

Question 3

Do you feel that we have achieved a set of entry and progress requirements which ensure the worst practices are not occurring and that small-scale and artisanal fishers are making strong progress towards building a sustainable fishery?

This question prompted a variety of responses from stakeholders. While some felt the requirements are appropriate to ensure fisheries are progressing towards sustainability, others believe improvements need to be made to the Standard.

For example, New England Aquarium stated,

“Although the resource management criteria do appear to ensure that worst practices are not occurring, entry requirements and progress requirements may be difficult to achieve. The progress requirements would also be made more robust through additional identification of “major” indicators.”

A stakeholder from Environmental Defense Fund wrote,

“Yes, I agree that the standards are thorough and accurate for achieving a sustainable fishery.”

The Ecology Action Center, however, provided this comment:

“No, we think that improvements need to be made to ensure that the worst practices are not occurring and that SSF [small-scale fisheries] are making strong progress towards building a sustainable fishery.”

A stakeholder from the University of Washington stated,

“On paper the requirements seem robust, but in some instances (e.g. BD and FM requirements), the fishery would face major structural changes that could take longer than the 6-year time period and require additional outside support. Fair Trade USA should be prepared to provide both logistical and financial support where necessary.”

Staff members from the Wild Salmon Center wrote,

“These entry and progress requirements are a reasonable starting point for a fishery aiming to become more sustainable, but we have some concerns about the ability of the standard to incentivize significant improvements over the entire certification period. Following certification, the only potential consequence for failure to meet ongoing requirements is suspension if ‘Major’ requirements are not met. However, the standard document does not seem to explicitly state the degree of non-compliance needed to trigger suspension, which creates leeway for the fishery to delay improvements, particularly if they are not associated with ‘Major’ requirements. Based on first-hand experience with MSC certification of salmon fisheries, it is not uncommon for fisheries to delay implementation of improvements when incentives are lacking, especially when the improvements require time and money. Thus there is some uncertainty about how much these requirements will drive progress toward building a sustainable fishery.”

Finally, WWF provided these comments:

“Lacking throughout the criteria are progress markers and benchmarks to track status and improvements. The reliance in some cases on the MBA-SW [Monterey Bay Aquarium Seafood Watch] methodology will only provide a snapshot of the fishery (not benchmarking tools) and are of limited use for tracking progress. There should be markers or benchmarks to monitor progress. At the same time, annual auditing for monitoring progress...could incur costs beyond the affordability of SSF [small-scale fisheries] in this region.”

FT USA Response: Both during the initial writing of the draft Standard and the subsequent revisions, our goal was to create a Standard that is both attainable and environmentally rigorous. We acknowledge that not all fisheries will be able to successfully meet all criteria within the timeline we have laid out. However, our goal is to link fisheries with the support they need to meet those targets and build a more sustainable system – socially, economically, and ecologically.

To clarify, a producer may be suspended for not meeting any single criterion (not just the Major requirements). All identified non-conformities must be addressed through a corrective action plan that is approved by the certification body, regardless of whether the non-compliance issue is defined as a Major requirement. Also, non-conformities for any sub-set of requirements for a particular criterion may result in a decision to suspend the certification contract until compliance has been ensured, or even deny

certification in the program. The Fair Trade Certification Manual has a section detailing suspensions, and is available for download [here](#). Additional information concerning the certification process itself can also be found in the introduction to the Capture Fisheries Standard, available for download [here](#).

Question 4

Do you think the data-limited tools we have developed will be easy for small-scale and artisanal fishers to use? Do you think they incorporate appropriate best practice and methodologies?

The comments we received in response to these questions largely stated that a third-party will likely be needed to conduct the stock assessments, primarily because small-scale fishermen often lack the technical expertise required. We recognize this reality, and have developed a Standard that does not stipulate who should conduct the assessments, just that they must exist. The certificate holder is responsible for ensuring the criteria related to data collection and stock assessments are successfully met, and partnering with a third-party may be the most efficient and effective way to do so.

Given the data-limited nature of most small-scale fisheries and the complicated structure of assessment models, Fair Trade USA reached out to industry experts and stock assessment scientists throughout the development of this program. Our data-limited tools and compliance criteria reflect many conversations with those experts. As data-limited stock assessment science and tools continue to expand and improve, we will adjust the Standard to reflect the latest knowledge, with an eye toward utilizing tools currently available rather than creating our own.

Finally, educating fishermen on the importance of data collection, monitoring, and assessment, as well as the best practices and technology available for each, is critical. Engaging fishermen directly will increase their investment in both the Fair Trade program and the overall health of the resource. The Capture Fisheries Standard reflects this.

The following sections list comments specific to individual criteria, as well as the Fair Trade USA response. Comments are arranged according to the stakeholder's name, in alphabetical order. For the most part we have not included comments that stated agreement with the Standard or the compliance criteria, but rather have focused on feedback that required a direct response from Fair Trade USA. If a submitted question has been mistakenly left unaddressed within this document, please feel free to contact us directly.²

1. Structural Requirements (STR)

1.1. The Market Access Partner (MAP)³

Ecology Action Center:

Provisions should be made so that the MAPs have an interest in the financial health of the fishermen as well as the sustainability of the stock and not just the exploitation, sale and trade of the resource. They should not be the primary price setters.

FT USA Response: The certificate holder (previously termed MAP) is responsible for conducting an assessment of the social, economic, and environmental development needs of the registered fishers and their community. Furthermore, all pricing and terms of trade between the buyer(s) and the fishers must be agreed upon within signed contracts. One of the goals of the Capture Fisheries Standard is that over time fishers become empowered as a group to negotiate even better terms of trade, however we cannot regulate actual pricing in the Standard itself.

New England Aquarium:

STR – MAP 4.1 and 4.2 (the MAP must identify risks): This should be a requirement of the standard, and not dictated by the MAP. Non-compliance should be dictated by the audit manual.

FT USA Response: This criterion is meant to be a tool for the certificate holder to identify risks of non-compliance in order to more effectively and efficiently meet the requirements of the Standard and prepare for the audit.

STR – MAP 5.3 (effective Internal Control System is required): Effective needs to be defined. There is too much ambiguity to control for differences between CBs.

■ *FT USA Response:* This criterion was combined with MAP – 5.1 and clarified.

STR – MAP 6.1 (registered fishers are committed to the program): How is this indicated? Verbally, through a signature?

■ *FT USA Response:* The criterion (STR – CH 1.5) now states: “The registered fishers have basic knowledge of the Fair Trade concept and have indicated their commitment to participating in Fair Trade and to cooperating with the certificate holder through a signed agreement.”

STR – MAP 7.1 (allowing unannounced audits, and providing documentation to auditors): This is determined through the effectiveness of the audit. It by itself should not be a point within the standard.

FT USA Response: We elected to keep this criterion in the Standard as it is important to reiterate to the certificate holder and the registered fishers the possibility of unannounced audits.

² Please email Ashley Apel, Fisheries Program Manager, at aapel@fairtradeusa.org.

³ The Market Access Partner section has been changed to Certificate Holder in the updated Standard.

WWE:

STR-MAP 6 (fishers have basic knowledge of Fair Trade): State “ALL of the registered...” or state/footnote that this is inferred every time the document mentions “The registered fishers...”

FT USA Response: We believe this is inferred throughout the Standard and routinely communicate this to stakeholders and interested parties.

There should be more than one representative present within the MAP/FA group who is a sustainability manager or can represent the natural resource without any vested interest or stake in its usage. This person must be independent. The group should also include a management authority who can be responsible for completion of activities as needed and give perspective on the broader management of the coastal zone resources.

FT USA Response: Given the limited resources available to artisanal and small-scale fisheries, we have not included an independent sustainability manager in this version of the Standard. We will, however, take this comment under advisement for future iterations.

1.2. The Fisher Association(s) (FA)

New England Aquarium:

STR – FA 1.4 and 1.5 (fishers joining an Association): None of the points will prevent bias or prejudice in accepting new members.

■ *FT USA Response:* Discriminatory practices of who can participate in the program are covered under the Fundamental Human Rights section of the Standard. Prejudice in allowing new members to join an existing Fisher Association is not allowed (see FHR – DAP 1 in the updated Standard). The Fisher Associations, however, create their own rules, including the addition of new members. This is purposefully built into the Capture Fisheries program to increase empowerment among fishermen. To clarify the intent, we have added guidance to criterion STR – FA 1.6 that states “Admittance of new members to the Fisher Association cannot not be discriminatory.” This guidance is binding and must be followed.

STR – FA 6 (fishers taking over the certification): No compliance criteria?

■ *FT USA Response:* This Standard was changed to a compliance criterion and moved to the certificate holder section to increase clarity.

1.3. The Fair Trade Committee (FTC)

No comments received for this section.

2. Empowerment (EM)

2.1. Development and Management of the Fair Trade Plan (DM)

New England Aquarium:

EM – DM 1.2 (development of the Fair Trade Plan): This is not mandatory?

FT USA Response: All criteria are mandatory. ‘M’ in the document means ‘Major’: those categorized as Major carry especially severe consequences (e.g., immediate certificate suspension) for non-compliance.

2.2. Inclusive Participation, Transparency and Financial Accountability (PTA)

COBI:

EM – PTA 12 (external financial audit of premium use): [Fishers] would probably ask for more details about the external financial audit, how should it be done? How it would cost? etc.

■ *FT USA Response:* Interpretation guidance was added to the Standard to increase clarity concerning the responsibilities of an external financial audit.

EM – PTA 13 (training of FT Committee members): What kind of training or capacities? What if the FAC is already a strong organized group of fishermen? Also it would imply an extra cost for the fishers’ group, that I guess should be paid with the FT premium?

FT USA Response: The administrative and organizational capacity-building trainings are meant to teach fishermen the best practices of managing accounting and finances so they can fully take on administrative responsibilities for the Fair Trade Premium by Year 6. The certificate holder is responsible for the cost of these trainings; they cannot be paid for using Fair Trade Premium unless the Fisher Association itself is the certificate holder.

New England Aquarium:

EM – PTA 6.2 (members’ understanding of accounts): Earlier than year 6?

■ *FT USA Response:* This was combined with another criterion and moved to Year 3. It is now part of criterion ECD – FTP 5.4.

EM – PTA 7: Here it says Fisher Association and in the Compliance Criteria it says "General Assembly"

■ *FT USA Response:* This was a typo and has been fixed.

EM – PTA 12.1: It seems odd to make this a year 0 requirement when the Fair Trade Premium has not been delivered to the Fair Trade Committee yet. This comment applies to several of the compliance criteria in this section. Should this not be a Major?

■ *FT USA Response:* We kept this criterion as a Year 0 requirement; however language was added specifying it is applicable at the first payment of Fair Trade Premium. The requirement that there be no evidence of misuse of the Premium is already a Major requirement.

EM – PTA 14: The timing and order of EM-PTA 11-18 [(receipt and accounting of premium)] seems a bit off. For instance, EM-PTA 11.4 must be completed by year 0, but EM-PTA, which appears to be saying the same thing, isn't required until year 6.

■ *FT USA Response:* The entire PTA section has now been reorganized – its criteria have been placed within more applicable sections, and language was added to increase clarity concerning the timing of each requirement. For example, many of the PTA criteria have been moved to the Fair Trade Payments and Premium section. Unless otherwise specified, criteria in that section are not applicable until the first sale of Fair Trade product.

EM – PTA 16.3 (evidence of misuse of the Premium): How can there be no evidence of misuse in year 0 when the premium hasn't been received yet?

■ *FT USA Response:* Language was added to this criterion specifying it is applicable at first use of the Premium.

3. Economic Development (ED)

3.1. Fair Trade Payments and Premium (FTP)

See Programmatic Question 1 for the comments on this section.

3.2. Conditions of Employment (CE)

New England Aquarium:

CE Intro: “The certification body will define what constitutes a significant number of workers depending on various factors.”: Too vague.

■ *FT USA Response:* We have provided a definition for “significant number of workers” to be greater than five workers at any one time. The definition can be found in the Capture Fisheries Glossary, available for download [here](#).

ED – CE 1.3 (hours of rest): Is this standard? It seems like this might be too conservative.

FT USA Response: This criterion was directly pulled from ILO C188, Article 14.

ED – CE 2.1 (payment made in cash to worker): This should be major.

■ *FT USA Response:* This criterion has been reclassified as Major.

ED – CE 5.2 (permanent workers have written contracts): I would think this should be a year 0 requirement.

FT USA Response: In many locations, written contracts are not part of the normal employment process, and developing such a framework may include not only altering the employment process but also social norms. We have, however, added a Year 1 requirement that stipulates “Workers are aware of their rights and duties, responsibilities, salaries/wages, payment schedules, and work schedules. Employment conditions have been verbally agreed upon.”

ED – CE 6.3 and 6.4 (non-permanent workers): I don't see any difference in these two criteria.

- *FT USA Response:* Compliance criterion ED – CE 6.4 was removed; it was an unintentional duplicate of ED – CE 6.3.

Waitt Institute:

Define "living wage"?

FT USA Response: The term 'Living Wage' can be found in the general Fair Trade Glossary, available for download [here](#).

Wild Salmon Center:

ED 3.2 addresses exemptions that might be granted for fishers and operations that don't employ a significant number of workers. The provision that certification bodies will define what constitutes significant, without any guidance, is likely to promote inconsistencies in these definitions across certifiers, regions and fishers.

- *FT USA Response:* We have provided a definition for "significant number of workers" to be greater than five workers at any one time. The definition can be found in the Capture Fisheries Glossary, available for download [here](#).

WWF:

Section CE or 'Conditions of employment' refers to the 'minimum wage' whereas the most advanced labor standards currently set out that a worker must receive a 'living wage'. Is there any way to change this or build this into the standard?

FT USA Response: Payment based upon the national or regional living wage is the preferred level of payment, especially in locations where minimum wage is dramatically below living wage. In an effort to tackle this issue, the Capture Fisheries Standard incorporates both minimum wage (Year 0), and living wage (Year 3).

Where the fisher is given a share of the catch is there any way to encourage that this should be achieved perhaps in fish weight equivalent? It is difficult because in some circumstances where there is no catch, then there is no wage. The Standard must be realistic but also keep with the most current schools of thought on this. If a living wage is not achieved then the individual may be forced to work more and thus affect his tiredness (H&S implications), quality of life, etc.

FT USA Response: Because of the day-to-day variability of catch, it is indeed difficult to tie share-catch systems to living income (in the case of share-catch we are not talking about a wage paid by an employer to a worker, so we think about it as a "living income"). Our strategy here is to certify fisheries with healthy stocks so that a sustainable livelihood can be achieved by all fishers working in a share-catch system. Over time, the Standard also supports fishers to become empowered to improve efficiency and negotiate better pricing and terms of trade, contributing to a more sustainable income.

4. Social Responsibility (SR)

4.1. Non-Discrimination (ND)

New England Aquarium:

SR – ND 2.1 (identifying fishers from disadvantaged groups): What is the benefit of this?

- *FT USA Response:* We have reworded the criterion (now FHR – DAP 1.3) to clarify: “A program has been developed to improve the social and economic position of registered fishers who come from disadvantaged/minority groups.”

4.2. Freedom from Forced Labor and Human Trafficking (FL)

New England Aquarium:

FL Intro: There cannot be any holding of visas, passports, or worker documents. This should be a major

- *FT USA Response:* We agree. SR – FL 1.1 is a Major requirement, and retaining documents is included as an indicator in the guidance. In addition, SR – FL 1.3 states “The employer does not retain any part of the workers’ salary, benefits, property or documents in order to force them to remain.”

4.3. Protection of Children and Young Persons (PC)

Environmental Defense Fund:

How will this be monitored? Child labor is informal and hard to track? Or will this just be a promise by the Fisher Committee to FTUSA?

- *FT USA Response:* The requirements regarding child labor will be audited by SCS the same as the other requirements in the Standard, using a combination of worker interviews, observations, and document review. The criteria in this section also require the certificate holder to develop policies and procedures to address the risk of child labor; the auditors will check that the policies are comprehensive and are implemented.

ICAFIS:

Ensure conditions for safe work processes while fishing in night.

- *FT USA Response:* Under FHR – PC 3.3, workers under the age of 18 are not allowed to work at night. The guidance to WWS – OH1, which requires a safe workplace, is based upon ILO R196, Work in Fishing Recommendation, 2005, and includes several best practices which should mitigate risk inherent to night work.

If the female employer should arrange working conditions and appropriate sleeping quarters, and separate. I think it is realistic and robust.

- *FT USA Response:* The issue of sleeping quarters was not addressed in this first draft of our Standard, since the Standard was written to focus on the conditions on small boats which normally do not have closed sleeping quarters. Based upon this feedback we have added a new requirement to the Standard

that when there are closed sleeping quarters and both men and women are on board, separate sleeping quarters must be provided.

New England Aquarium:

SR – PC 3: Should say between the ages of 15 and 18?

■ *FT USA Response:* We have clarified that all workers under the age of 18 need to have working conditions adapted to their age and physiological needs. This includes family labor, where workers younger than 15 might help out their relatives after school or on holidays.

Tamatea Tairawhiti Limited:

They look ok but what about minimum remuneration?

FT USA Response: For family labor (where children help their parents outside of school hours), any remuneration is decided among the family members. For young workers (waged workers between the ages of 15-18), there cannot be any discrimination regarding wages or working conditions based upon age.

WWE:

In general, following the ILO standard is fine. We know that it is important for young people to be shown the ropes by their relatives and that this happens at a young age in many communities. As long as they are not paid and they are not expected to work – this is parental discretion. The way this is laid out – i.e. following UN legislation – is likely the only option. However, there may be cases where this is not possible since some children are literally brought up on boats. In many countries they don't have functional schools so they won't even have a choice. We may have to have alternatives for these cases.

■ *FT USA Response:* We agree, and the guidance recommends that where no schooling is available, the Fair Trade Premium can be used to address this in collaboration with local governments.

SR-PC 1: Please also note in that Principles 3 and 4 in the ASC standard (which are specific to farms), the minimum working age is 18; therefore this is an inconsistency between the ASC and FT standards. We do recognize that in some circumstances it may be okay for those under the age of 18 to work in small-scale fisheries, as long as this does not jeopardize their schooling and alternative livelihood opportunities and thus lead to their social disadvantage.

FT USA Response: We have followed the ILO Convention on Work in Fishing (C188) here, which allows workers between the ages of 16-18 to work on vessels as long as their health, safety, and morals are protected and 15-year olds to work onshore under the same conditions.

SR-PC 2 (family labor):

- Generally, for SR-PC2 – SR-PC4, you may want to define training and occupational safety requirements, as well.
- We suggest changing to “relatives or guardians...”
- Re: “the work does not jeopardize”: Replace “does” with “shall”
- How to define “reasonable” time limits? This is currently very subjective and a loose requirement that is bound to be abused.
- How is “hazardous” defined? Many aspects of operation have potential to be hazardous, including in the plant. If the hazardous work requires skill/experience (e.g. engine repairs, ocean surface or

underwater rigging, etc.), then children would not be used; however, in case of menial tasks, it is the youngest crew member that may be assigned to the activity, and some are inherently hazardous to some extent (e.g. setting bait or gear).

- Does this apply to non-vessel work for children under 15, such as on-shore sorting/drying, etc., or is this not permitted? Please clarify.

■ *FT USA Response:* We have further specified the language to clarify that children under 15 cannot be employed for wage work (i.e., as an employee) of any kind. Children under 15 may work alongside family members or a legal guardian after school hours and under appropriate working conditions. Regarding specifying reasonable time limits, ultimately this is left up to the discretion of the family member or legal guardian supervising the child.

The guidance explains in more detail what can be considered hazardous work based upon ILO C182; it includes long working hours, exposure to dangerous chemicals, working at heights, and operating dangerous machinery.

Based upon the suggestion we have added the term 'legal guardians' alongside relatives when referring to family labor. Throughout the Standard we use the word 'does' rather than 'shall'. We understand that many Standards systems use the word 'shall' but within the compliance criteria we prefer to emphasize the desired outcomes rather than practices.

4.4. Freedom of Association (FA)

No comments received for this section.

4.5. Occupational Health and Safety (OH)

New England Aquarium:

OH Intro: None of these are major; there should be several major indicators in this section.

■ *FT USA Response:* We agree and have reclassified the essential criteria in this section as Major.

SR – OH 2: How does Fair Trade account for illiteracy among fishers and/or workers? Written policies are not useful if the people they are meant to help can't read.

■ *FT USA Response:* Throughout the Standard, whenever written materials must be made available to fishermen, the criteria specifically state that effective communication to illiterate members is also required. In addition, we encourage the appropriate use of pictograms on safety instructions and procedures.

SR – OH 3.2 (requiring medical exams): How often? Annually or before each trip?

■ *FT USA Response:* We have added a clarification based upon ILO Convention 188, Article 12, which indicates that for workers over 18, the health certificate must be less than two years old and for workers under 18, less than one year old.

SR – OH 5.6 (vessels with 100 or more fishers): How do these types of vessels fit into the Fair Trade model of supporting small-scale entities?

■ *FT USA Response:* We acknowledge the inclusion of vessels carrying 100 or more fishers fall outside of the scope of Standard; this criterion has been removed.

SR – OH 7.2 (sanitary facilities on board vessels): Year?

FT USA Response: Year 0 was added to this criterion.

5. Resource Management (RM)

Unsurprisingly, the vast majority of the comments we received concerned the Resource Management section of the Standard. After careful consideration of the feedback, we have made a few significant adjustments to this section, incorporating a large majority of the comments we received. First, the sub-sections have been reorganized into the following: Fishery Documentation, Data Collection, Stock Health, Biodiversity & Ecosystem Protection, Governance, and Waste Management. This was done in an effort to eliminate redundancies and confusion.

Given the lack of clarity, the species classification system was also overhauled to the following:

- Primary species: Any non-bycatch, retained species proposed as a unit of assessment for certification. Primary species may not be classified as endangered, threatened, or protected.
- Secondary species: Any non-bycatch, retained species not proposed as a unit of assessment for certification. Includes all non-primary, retained species classified as endangered, threatened, or protected.
- Bycatch species: Species caught incidental to the harvest of target species (i.e., primary and secondary species) and not retained (discarded). Includes mammals, seabirds, and reptiles, and all discarded species classified as endangered, threatened, or protected.

This effectively eliminated the complicated percentages present in the original classification system in an effort to improve clarity and increase the likelihood of document completion in Year 0.

Revising the species classification lead to a need to reorganize the stock assessment methodology. Again, our main goal was to create a Standard that is both attainable and environmentally rigorous. Throughout the first few years of the Capture Fisheries program we will continually strive to achieve that balance, adjusting the program as necessary. Furthermore, we will incorporate new knowledge as stock assessment science for data-limited fisheries continues to improve and expand.

The Resource Management section was also revamped with a specific eye toward timelines. Multiple stakeholders stated some criteria would be difficult to achieve ahead of others. Our hope is the current version addresses these issues.

5.1. Information to Support Resource Management (IN)

Based upon reviewer's comments, the majority of changes to this section were made to increase clarity. More specifically, this section was split into two: Fishery Documentation and Data Collection. Fishery Documentation focuses on species classification and the Fishery Management Plan. Data Collection focuses on the data collection and monitoring of fishing trips, catch information, and life history data, all of which are important to better assess and manage a sustainable fishery.

New England Aquarium:

RM – IN 1.2 (ETP definition): I agree IUCN should be included, but this is not in the ETP definition in the glossary.

■ *FT USA Response:* The Glossary definition of endangered, threatened, and protected species has been updated.

RM – IN 2.2: What defines effective data collection? What will be the benefit of making accessible to registered fishers? Should it not also be accessible to resource managers?

■ *FT USA Response:* The phrase was updated to state “effectively reaching the stated goals” in an effort to increase clarity. The criterion was also edited to include access to resource managers.

RM – IN 2.4 (catch data): “The total length of individuals of each species.” Should provide some guidelines on appropriate sampling techniques. “Amounts of Bycatch species based on a metric appropriate for the fishery.” Should be made explicit.

■ *FT USA Response:* Multiple resources about best-practices for fishery data collection and monitoring programs can be downloaded online. Fair Trade plans to build an online library to help consolidate those resources.

The phrase “Amounts of Bycatch species based on a metric appropriate for the fishery” has been removed. Fishermen are required to record the number of individuals of bycatch species caught.

RM – IN 3.1 (fishery data): Should be elevated to 100% of landing sites by year 6. In 2.4 it indicates that data should be collected on species and volume for all fishing trips by year 1, so these criteria are at odds.

■ *FT USA Response:* A criterion has now been added specifying fishery data must reflect at least 90% of the total catch in Year 6 (100% is difficult even for highly-managed fisheries). There are also criteria for Year 1 and Year 3 to increase clarity.

RM – IN 3.2: Should provide guidance here [on appropriate methods for data collection].

FT USA Response: Multiple resources about best-practices for fishery data collection and monitoring programs can be downloaded online. Fair Trade plans to build an online library to help consolidate those resources.

RM – IN 4.1: Landing port should be in conjunction with fishing area. There should be no transshipping or boat-boat transfer of landed catch. GPS records: Not really sure this is necessary. What purpose does it serve?

■ *FT USA Response:* In response to this feedback, GPS records have been removed from this criterion. Additional guidance was added concerning transshipping and boat-to-boat transfers of catch.

Wild Salmon Center:

RM-IN 2 - To the extent logbook data is relied upon to collect essential compliance data such as catch, there needs to be some verification of its adequacy/accuracy as part of the criteria, probably by Year 1 or 2.

■ *FT USA Response:* A criterion was added to review catch data on a regular basis to ensure its accuracy and make adjustments to the data collection methodology where needed.

WWE:

RM-IN 1.2: How would “documentation” of ETP species be verified? Through onboard observers? Logbooks? Other management agency documentation? This may be onerous for Year 0 requirements

FT USA Response: A list of ETP species that have been encountered by the fishery can be created either through catch records or by interviewing the fishermen. The list needs only include ETP species caught in recent memory/the collective memory of the community to get a basic view of the potential impacts of the fishery. ETP species caught after certification must be documented as stipulated in the Standard.

RM-IN 1.4 (species lists): Updated how often?

■ *FT USA Response:* Documents of the species in the fishery’s catch are updated annually. The criterion has been edited to reflect this.

RM-IN 1.5 (map of fishing range): This is good but would likely require written confidentiality agreements and nondisclosure clauses, etc., with the fleet through the FA or MAP. In addition, many fisheries will not have such detailed habitat information nor have the resources to obtain this information.

FT USA Response: The use of written confidentiality agreements is an option open to all Fisher Associations. Although many fisheries will not have detailed habitat information, fishermen often know the type of habitat present in various fishing locations. The goal is to use this knowledge to create a habitat map that can be used in management decisions.

RM-IN 2.1: Re: “The MAP can demonstrate that systems are in place (logbook or otherwise)”: By Year 6 it would be important to specify exactly the minimum requirements for data collection. For example, X% observer coverage, logbooks utilizing credible data sheets/data management such as NOAA/SPC, etc.

■ *FT USA Response:* Criteria were added specifying the percentage of total catch that must be recorded in Years 1, 3, and 6.

RM-IN 2.1 (evidence that logbooks meet the Standard’s criteria): What is considered sufficient support?

■ *FT USA Response:* This criterion was combined with RM – IN 2.2 and clarified.

RM-IN 2.2 (accessible data collection system): How to measure inclusiveness, effectiveness, accessibility?

■ *FT USA Response:* The language in this criterion was reworked to increase clarity. The three terms referenced here are no longer included.

RM-IN 2.4 (fishing trip data): How to determine which metrics are appropriate?

■ *FT USA Response:* The phrase “Amounts of Bycatch species based on a metric appropriate for the fishery” has been removed. Fishermen are required to record the number of individuals of bycatch species caught.

RM-IN 2.5 (landings data): How to determine which data are appropriate?

■ *FT USA Response:* This criterion was removed as redundant.

RM-IN 2.6 (traceability systems): “General Assembly of the FA” – is this applicable to all fisheries?

■ *FT USA Response:* We determined that the requirement to present options for different traceability systems to fishers was not useful, and it has been removed.

RM-IN 2.7: Shouldn't traceability be a requirement of certification? Allowing six years to ensure that products labeled as FT-certified actually come from FT-certified fisheries would undermine the credibility of the program.

■ *FT USA Response:* The traceability section was updated to better reflect the importance of traceability; it now requires a traceability system be in place at the first sale of Fair Trade product. By making this change, the timeline for required documentation is now better aligned with the rest of the section.

RM-IN: Please include reference to bycatch best practices and whether efforts are being made to reduce bycatch. For some sea turtles, even a "1%" bycatch rate would be an impact that requires mitigation.

■ *FT USA Response:* A criterion was added that specifies, "In fisheries where ETP species are unintentionally caught, registered fishermen demonstrate they are using industry-recognized best practices and available technology to avoid ETP species. This includes the use of selective fishing gear."

RM-IN 2.7: Re: "system to ensure traceability": For marketplace recognition of FT certification, the traceability system should extend from the vessel through the processor and beyond. Lot or case numbers shipped as exports should be cross-referenced with the registered vessels, as a minimum requirement.

FT USA Response: Traceability is an important component of all Fair Trade USA certified products. The traceability system must be able to track a fish from its landing point, through the supply and processing chains, to the final buyer. These requirements are contained within the Fair Trade USA Trade Standard, available for download [here](#).

RM-IN 3.1: Re: "There are landings data which reflect the composition of Retained species": Wording of 'actual landings data' is confusing given the requirements that follow. What actually gets FT 'certified' – the landing port or the fishing vessel? The 50% and 25% could be a good way to get fishers to start monitoring their landings – but if they are already doing this 50% / 25% of the time, can it be expected for them to begin doing this all the time?

■ *FT USA Response:* Each Fair Trade USA certificate applies to a single fishery, as defined in the Fair Trade Glossary. The criterion referenced here (now RM – DC 1.5), has been modified to reflect a percentage of total catch: "Fishery data reflect at least 50% of total catch." Additional criteria require fishery data reflect at least 75% and at least 90% of the catch in Year 3 and Year 6, respectively. Finally, a criterion has been added that states, "Catch data are reviewed every six months for accuracy. Where necessary, adjustments are made to the data collection strategy (both collection of data and data entry) to ensure the data are accurate." This ensures that fishery data accurately reflect the composition of the population in the water.

RM-IN 3.1: Seems it would be better to require data from at least 50% of the catch than 50% of the landing sites. Also, this seems too low to reflect the true composition of retained species. Landings data are not hard to record so the requirement should be greater.

■ *FT USA Response:* We agree, and in response to this feedback the requirements were changed to a percentage of catch rather than landing sites. Fishery data are required for at least 50% of the total catch in Year 1 and 75% of the total catch by Year 3.

RM-IN 4.2: What is sufficient evidence? What are the requirements in terms of data quality? Should also require evidence that the system actually works.

■ *FT USA Response:* Interpretation guidance has been added to this criterion to clarify the requirements of data quality.

RM-IN 4.2: Re: “Systems are in place to control the quality of catch, landings, and fishing trip information”: The FAs (of which the SSF are members) or the MAPs should be responsible for ensuring this is in place. All of the “Requirements” are data quality control measures...what about controlling product “quality”?

FT USA Response: Quality requirements are dictated by the buyer and should be detailed in the purchasing contract.

RM-IN 4.3: Recording of (and necessary training regarding) scientific names of all species should be required to ensure no confusion from colloquial/local names.

■ *FT USA Response:* The interpretation guidance concerning the logbook criterion states fishermen may require educational training on appropriately documenting fishery data. The certificate holder is responsible for covering the training costs.

5.2. Overfished Status (OF)

Given the fact the Capture Fisheries program will likely be working with data-limited (or data-free) fisheries, we spent a significant amount of time revising the section related to overfishing and overfished status (now called Stock Health). In the draft Standard, overfishing and overfished were convoluted, and it was difficult to understand what was required for each of the species classifications. Revamping the classifications helped solve this issue.

With one eye toward attainability and realism, and the other toward robustness and conservation, the Stock Health section now requires assessments for both overfishing status and overfished status. The requirements are spread over time to allow fisheries to gather data (see the Data Collection section in the finalized Standard), and assessment criteria for primary, secondary, and bycatch species are tailored to the different species classifications.

New England Aquarium:

RM – OF 1.1: MSC certified: I would delete. This is not really relevant to the stock status and is confusing in the Fair Trade standard. PSA: This may be acceptable for year 0 (still need to review the PSA), but a more robust method should be used by year 6. Risk of overfishing: Risk of being overfished?

■ *FT USA Response:* The language referencing MSC was removed. The revised criteria in this section now separate overfishing and overfished. The PSA is acceptable to use when determining the vulnerability of a stock to fishing pressure in Year 1 (primary species) and Year 3 (secondary and bycatch species). Stock status for primary species (overfished status), however, must be determined through more robust means by the Year 3 audit and the Year 6 audit for secondary species.

Waitt Institute: Why are “minor retained” species not eligible for certification? This could mean they become bycatch.

■ *FT USA Response:* The species categories have been updated to primary and secondary species to decrease confusion concerning species classifications.

WWF:

RM - OF 1.1: Where the MSC is mentioned, could the FT standard please state to which MSC criteria it specifically refers? This will make the comparison easier for users. It could also be better to refer to MSC criteria directly, e.g. state that the FT standard would expect the fishery to achieve MSC criterion x.x.x at

which point the stock status would achieve a pass of over 80 – this way there is less room for misinterpretation.

■ *FT USA Response:* Mention of MSC has been removed from this criterion in order to reduce confusion. Interpretation guidance was added to the overall Resource Management section stating, “Fisheries that hold a valid certification from the Marine Stewardship Council (MSC) will be recognized as compliant with the Resource Management section of the Standard. A copy of the MSC certificate must be provided to the auditor.”

RM-OF 1.1: “The MAP and/or FA is Marine Stewardship Council (MSC) certified or has determined stock status using an appropriate stock assessment method”: Could include alternatively that has the fishery has determined stock status via an MSC pre-assessment and/or credible FIP linked to MSC performance indicators.

■ *FT USA Response:* The final version of the Capture Fisheries Standard does not specify who must conduct the stock assessment or for what purpose (i.e., MSC pre-assessment, government agency, credible FIP, etc.). We will accept any stock assessment that has been conducted using peer-reviewed and tested methodologies and best-practice data collection techniques.

RM-OF 1.1: Many small-scale fisheries will not have a peer reviewed stock assessment for the target species let alone ALL retained species.

FT USA Response: The Capture Fisheries program requires fisheries start gathering catch data from the beginning of the program. The goal is to have sufficient data to be able to conduct assessments specifically built for data-limited fisheries. The Standard requires stock assessments for primary species (those being Fair Trade Certified™) in Year 3 and assessments for secondary species in Year 6.

RM-OF 1.2: Application of the data should then be required.

FT USA Response: Application of the data is necessary to conduct stock assessments, which are a requirement of the Standard (see RM – SH 3).

RM-OF 2: Re: “All Bycatch species are assessed”: Such stock assessments may not be feasible in most small fishing villages - this may render them ineligible for FT certification. What is ‘appropriate’? How to determine whether available data are ‘sufficient’?

FT USA Response: We understand the difficulty of assessing discarded species, however, we believe even a simple analysis is beneficial to better understand a fishery’s effects on the ecosystem. A Productivity and Susceptibility Analysis in Year 3 is the only type of assessment required for bycatch species in the finalized version of the Standard. The basic life history data necessary to conduct a PSA (also required in Year 3) can usually be found within published literature and/or online databases.

RM-OF 2.1: Even if not a high risk currently, there should be a rebuilding strategy or an action plan with indicators/objectives for recovery of any ETP and other depleted populations.

FT USA Response: We agree; a rebuilding strategy is a requirement for any overfished primary or secondary species (see RM – SH 3.1 and SH – 3.3). The secondary species classification includes ETP species.

Stock Assessment Methodology

The backbone of successful, sustainable fisheries management is accurate and precise stock assessments. We received numerous comments on our Data-Limited Stock Assessment Decision Tree and our stock assessment methodology in general. Taking those comments into account, we have developed a cleaner, more concise stock assessment methodology. Rather than having multiple decision trees for data-limited fisheries, we've paired it down to one to be used for both primary and secondary species in low-data situations. As additional data are gathered each year, more robust assessment methodologies can be used, thereby decreasing the associated level of uncertainty.

Because bycatch species are discarded (as per the Fair Trade definition) and therefore gathering data is difficult, a full stock assessment is not required. However, for all endangered, threatened, or protected species either retained (secondary species) or discarded (bycatch species), an additional analysis is required that shows the fishery does not pose a risk of serious or irreversible harm to the population viability of those species.

Ecology Action Center:

...small-scale fisheries, especially artisanal fisheries, may rely on a form of traditional ecological knowledge (TEK) (also known as traditional knowledge or indigenous knowledge) as a basis for their management schemes. The current decision tree does not allow for small-scale fisheries to incorporate their TEK into the assessment process. Fair Trade USA should create more opportunities for fishers to include their existing TEK in the more "official" data sets.

■ *FT USA Response:* We acknowledge that traditional ecological knowledge is often a highly useful tool in assessing fish stocks. Although we have chosen to not incorporate TEK more fully into the assessment methodology, we added the following question to consider when analyzing the performance indicators: "Are the indicators and positive/negative trajectories consistent with local knowledge of the fishery?" to encourage the use of TEK.

Monterey Bay Aquarium:

A few comments on the clarity of the assessment tree:

1. The navigation of the tree is a little unclear, it may help e.g. to clarify that the different indicators do not need to be assessed in a particular order (i.e. you can pick any three) and that you need to do at least three (this is clearly stated, but then as you navigate through the tree it looks like you stop when you reach a green box). Also, it may help to clarify that ETP species need to be assessed through Decisions Trees 2-5 as appropriate in addition to Decision Tree 1. Finally, because the instructions say to score "at least" three indicators, do you want to provide some guidance for the case where there may be assessments available on more than three (e.g., what do you do if there are 5 indicators assessed and only 3 show a positive trajectory)?

■ *FT USA Response:* Additional instructions were added to the decision tree clarifying the order of the indicators and the required assessment of endangered, threatened, and protected species if a stock assessment does not already exist. Additional guidance was added if more than three indicators are calculated, stating, "For fisheries with sufficient data to track more than three performance indicators, at least 60% (or two-thirds) of the performance indicators analyzed must show a positive trajectory. If only 30% (or one-third) of the indicators analyzed show a positive trajectory, the fishery cannot be certified unless additional analysis of the species can demonstrate the stock is healthy and stable."

2. I found it may be helpful to clarify the distinction between CPUE and catch/effort. You mentioned that this was referred to in specific references but I couldn't find those particular citations. In

addition, I'm not sure if this was left out by mistake but there is no indication of whether or not stable CPUE would be considered a positive trajectory.

■ *FT USA Response:* The indicator catch/effort was removed due to its duplicity with CPUE. A stable CPUE was mistakenly left out of the draft decision tree; it has been added as indicating a positive trajectory.

3. I wonder how practical it is to require that “vulnerability must decrease to its lowest possible score” when it can't be reduced to below 1.8 due to species biology. Theoretically, wouldn't that include, for example, moving the fishery so that it no longer overlaps with the species of interest - which isn't always feasible? Maybe this just needs a bit more clarification, or perhaps if the fishery can't reduce vulnerability below 1.8 due to the species biology it can't remain certified unless it can undertake the more data-rich forms of assessment on that species to demonstrate that it isn't posing an overfishing risk.

■ *FT USA Response:* The criteria for total vulnerability scores ≥ 1.8 have been changed to reflect this recommendation. Depending upon whether the species is classified as primary or secondary, the Fishery Management Plan must include a strategy with stated goals to reduce fishing pressure on the species and eliminate overfishing within two or three years for primary or secondary species, respectively. These yearly requirements directly line up with the stock status yearly requirements in RM – SH 3 in the final version of the Standard.

New England Aquarium:

Why would you not use the same decision-trees with the data-limited assessments as for the retained species? Are you trying to make a distinction between ETP and non-ETP here?

■ *FT USA Response:* The decision tree applies to secondary species classified as endangered, threatened, or protected that do not already have a stock assessment. Language was added to the decision tree instructions clarifying this.

If more than 3 performance indicators are analyzed, how are the guidelines below adjusted? Does this provide a loophole, but allowing someone to pick and choose the indicators?

■ *FT USA Response:* Additional guidance was added to the decision tree if more than three indicators are calculated, as well as how best to choose the indicators.

Also, the directions should specify that a diversity of indicators should be used. Using 3 indicators that all use the same type of information is not robust.

■ *FT USA Response:* Language was added to the decision tree recommending the use of different types of data to increase robustness.

What if six years is not biologically feasible (e.g. for a long-lived species); shouldn't the language be within six years or one lifespan of the species, similar to MSA?

■ *FT USA Response:* The criteria concerning rebuilding timeframes were updated to reflect this recommendation and now read, “...the Fishery Management Plan includes a rebuilding strategy with

stated goals to allow the stock health to improve within a reasonable timeframe. The interpretation guidance includes the definition of ‘reasonable timeframe’ used in Seafood Watch’s criteria⁴:

“Dependent on the species’ biology and degree of depletion, but generally within 10 years, except in cases where the stock could not rebuild within 10 years even in the absence of fishing. In such cases, a reasonable timeframe is within the number of years it would take the stock to rebuild without fishing, plus one generation, as described in Restrepo et al. (1998).”

Fishing mortality > natural mortality: May not be an appropriate indicator for top predators with very low natural mortality rates.

■ *FT USA Response*: A footnote was added to provide this information.

Optimal length: This definition from Froese 2004 should be provided in a footnote or in the glossary.

■ *FT USA Response*: A definition was added as a footnote and in the Glossary.

Megaspawners: This also needs to be defined with a footnote or in the glossary. Also, according to how I interpret Froese 2004, management measures should strive to prevent megaspawners from making up >10% of the catch, but in the absence of management measures, the amount of megaspawners in the catch should reflect that of the actual population and should therefore be closer to 30-40%. This indicator needs further clarification.

■ *FT USA Response*: A definition for megaspawners was added as a footnote and in the Glossary. Additional clarification was also added to this indicator specifying the difference between a management framework with a goal of zero catch of megaspawners versus where catch data reflect the size and age structure of the population.

Avg. length is staying the same or increasing: Delete; it would be unusual for the length to be increasing.

■ *FT USA Response*: We agree. The term ‘increasing’ was removed.

Abundance vs. Change in CPUE: As currently worded, I think these two indicators are saying the same thing.

■ *FT USA Response*: We agree. The indicator catch/effort was removed due to its duplicity with CPUE.

Visual census data: Ok, but should recognize that this is unlikely for most marine species.

FT USA Response: Although visual census data may be rare, we did not want to exclude it from the decision tree in an effort to encourage the use of such data.

Create a catch curve to calculate fishing mortality (F), Spawning Potential Ratio (SPR), the three Froese Sustainability Indicator, and/or change in average length over time. Use Table 1 to determine if the performance indicators are showing a positive or negative trajectory. It would probably be a good idea to provide more detailed instructions here.

⁴ Monterey Bay Aquarium. 2014. Seafood Watch Criteria for Fisheries, Glossary. Version March 31, 2014. Retrieved from http://www.seafoodwatch.org/cr/cr_seafoodwatch/content/media/MBA_SeafoodWatch_CaptureFisheriesMethodology.pdf

FT USA Response: Although the Capture Fisheries Standard does not include advice on specific assessment methodologies, we plan to develop a toolkit using information already in existence to provide fisheries and stakeholders with this type of information.

Do you have catch-per-unit effort (CPUE) data for this species?: More clarification is needed around catch, effort, and CPUE. The questions should be whether you have catch records and effort records; if you have both then you can calculate CPUE, if not, you can only look at trends in catch or effort.

■ *FT USA Response:* A question was added to the decision tree concerning fishing effort to better clarify the data required to calculate CPUE.

Sustainable Fisheries Group/Fish Forever:

...it might be nice to provide guidance on selecting the 3 performance indicators that will be used to determine eligibility in situations where more than 3 indicators are available. For example, if data are available, it might be advisable to require the performance indicators to come from multiple data streams. Using different data streams, instead of just one, can help reduce uncertainty and biases of any one data stream and help gain a more holistic view of the fishery. For example, I could imagine a site using a biased length composition survey to get 3 length-based indicators that all look good, while not using underwater survey data that show a very different picture. In fact, it almost seems like a site may want to assess all possible indicators and data streams, along with the best available local and scientific knowledge of the site, to come up with a holistic interpretation of how the fishery is doing (although I realize this gets very complicated!)

■ *FT USA Response:* Incorporating both fishery-dependent and fishery-independent data into a stock assessment is ideal, although not always possible. We have added language to the decision tree that encourages the use of multiple types of data.

Many of these indicators may change over time, and are often used as part of an adaptive fisheries management framework rather than standalone snapshots. Will the fishery be reassessed every year using the same indicators, with continuing FT membership contingent on that assessment?

FT USA Response: Stock assessments must be updated yearly, however we realize management indicators may vary over time as additional data are gathered. Fair Trade audits occur on a yearly basis, so this criterion will be checked each year.

Is there somewhere you outline the data requirements that are required to maintain FT eligibility? Do they have to just keep collecting whatever data got them into the program in the first place, or will they be required to collect data to inform all of the different data-poor performance indicators? Or are they expected to start collecting data that could eventually lead to a more traditional stock assessment? Also, is there guidance on specific data collection protocols? For example, the need to stratify length composition data collection across the entire fishery (temporally, across different gear types, across different landing sites, etc). As I'm sure you know, how you collect the data can really influence interpretation of results.

FT USA Response: Data requirements are outlined in the Fishery Documentation and Data Collection sections of the Standard. Although the Capture Fisheries Standard does not outline specific data collection protocols, we are happy to provide fisheries and stakeholders with published literature that does so.

It seems like for the "positive" and "negative" trajectories for the different performance indicators, you're using best practices/standards from literature. This is a great approach, especially in many data poor situations where I'm sure better information is not available. Could it be possible though to have the option for different (and even lower) reference points at sites where site- and species-specific studies have been done

that indicate different optimal reference points? For example, I know that for some species and situations, SPR below 40% could be acceptable. Acceptable reference points may also be quite different for inverts (ie, fishing mortality could potentially be higher than natural mortality lobsters).

■ *FT USA Response:* We acknowledge the reference points used in the decision tree may not be optimal for certain species. Based upon this recommendation we have added language to the assessment methodology encouraging the use of appropriate reference points, including those that may not be shown in Table 1.

For the fishing mortality indicator - this is a great one, although natural mortality is notoriously hard to obtain and variable. Is there guidance on how a site selects the proper natural mortality? Do they need a site specific study, or can they just grab this from literature?

FT USA Response: Although a site-specific study is optimal, natural mortality data obtained from literature may be used.

Is there guidance on what types of species can be included in the standard, and what types of performance indicators are appropriate for which species and situations? Most of the indicators listed seem to be more geared to non-pelagic reef finfish. For example, assumptions for density ratio break down when the no-take zone is not well enforced, or when movement ranges are large enough to move back and forth between fished and unfished areas. Also, for all of the length-based methods, you assume the length composition data is a representative sample of the entire population. You may not get this for highly mobile or pelagic species that only spend a brief amount of their life history in the area. I imagine that if a community is trying to certify a tuna fishery, these indicators may not be appropriate.

FT USA Response: Except for any species classified as endangered, threatened, or protected, mammals, seabirds, and reptiles, all wild-harvested marine species are eligible for Fair Trade certification. Although we do not lay out recommended indicators for each species, the decision tree does state the importance of choosing indicators and reference points appropriate for the fishery.

Would be worthwhile to include advice on stock assessment methods for non fin-fish (lobster, conch, etc.)

■ *FT USA Response:* We agree, and have augmented the decision tree to reflect this recommendation.

WWE:

It does not appear that any of the Fisheries Management criteria refer to harvest control rules, meaning that the fisheries could be certified yet not have the correct management in place to ensure sustainable or responsible practices. Encouraging fishing through improved access to markets by community fisheries where proper HCRs have not been set is undesirable.

FT USA Response: The development of harvest control rules often requires significant amounts of data – something small-scale fisheries often lack. The Capture Fisheries Standard includes a criterion that states, “One or more controls on fishing mortality are included in the Fishery Management Plan. Examples include an allowable catch limit and/or effort restrictions such as gear, size, sex and/or season limits. Where possible, a target reference point and a limit reference point for landings should also be defined.”

Importantly, the criteria focus on the development and implementation of a management plan, yet do not include any ‘outcome’ indicators to demonstrate that the plan is actually effective and the fishery is actually fishing responsibly (which is even a step down from being proven truly sustainable). We believe that a Fair Trade Certified fishery, if the intent is to show responsible fishing (or progress toward sustainable fishing), must at a minimum strive to meet Principle 1 of the MSC standard: “A fishery must be conducted in a

manner that does not lead to overfishing or depletion of the exploited populations and, for those populations that are depleted, the fishery must be conducted in a manner that demonstrably leads to their recovery.” We feel that if a FT-certified fishery is making claims of responsible fishing, it should be able to demonstrate this point.

■ *FT USA Response:* The Standard mandates the Fishery Management Plan be reviewed annually and updated where necessary to ensure it is effectively reaching the stated goals. We have added guidance to this criterion stating, “Where possible, seek expert opinion from neutral fisheries management experts to ensure the Fishery Management Plan elements are likely to succeed.”

Much thought must be given to the assessment methodology. How is this program to be rolled out and monitored? When and by whom? What are the requirements for auditors? How will FT ensure that assessments are done accurately?

FT USA Response: Many small-scale fisheries currently have non-profit or market access partners. It is our hope those partners will assist the certificate holder in ensuring successful collection of fishery data and assessment of the stocks. It is ultimately the responsibility of the certificate holder to ensure the stock assessments are accurate and consistent with industry best-practices.

Data-limited stock assessment tree: Table 1 seems simplistic and based on two select studies, therefore it is hard to judge its appropriateness. Are the cutoffs applicable to all species?

FT USA Response: The indicators in Table 1 were chosen for their applicability in fisheries with little to no data. Because catch and length data are usually the easiest to collect (versus fishery-independent data such as underwater visual surveys), indicators were chosen that specifically utilize these data types and easy to gather life-history information. Table 1 was reviewed and vetted by multiple stock assessors to ensure its appropriateness and applicability. Additional data-limited assessment methodologies will be added to the table as they are developed. We recognize the cut-offs present in Table 1 are not necessarily applicable to all species, however recommendations were added to the decision tree encouraging the use of the most appropriate methods available, provided they have been peer-reviewed and tested for accuracy.

5.3. Biodiversity Protection (BD)

The Biodiversity Protection section of the draft Standard, (now Biodiversity & Ecosystem Protection), went through a few significant changes. First, the draft Standard contained a 10% benchmark concerning the amount of endangered, threatened, or protected (ETP) species allowed to be landed or discarded. This criterion was confusing to many, and left room for potentially negative impacts on ETP populations. The criteria now stipulate all ETP laws must be adhered to, ETP species must not be intentionally caught or harvested, and “In fisheries where ETP species are unintentionally caught, registered fishermen must prove they are using industry-recognized best practices and available technology to avoid ETP species. This includes the use of selective fishing gear.” Occasional harvest of endangered, threatened, and protected species does occur, even in the most highly-managed fisheries, and our goal is to ensure Fair Trade fishermen are doing their best to avoid such instances. The Standard also requires an analysis that shows the fishery does not pose a risk of serious or irreversible harm to the population viability of ETP species. Furthermore, the 10% benchmark was removed when the species classifications were revamped.

The habitat impact section also underwent some changes in an effort to increase clarity and ease of use. Without wanting to reinvent the wheel, the Capture Fisheries Standard now employs Monterey Bay Aquarium’s Seafood Watch habitat impact scoring system. Depending upon the score, the fishery must develop a strategy to either maintain its good fishing practices or improve its practices in either one or three years.

Finally, the ecosystem monitoring criteria were adjusted to contain more actionable, clear language. In addition, the timeline was modified to require the collection of ecosystem data by Year 4 at the latest.

Monterey Bay Aquarium:

More generally, it would make sense to include in the standard a single requirement that *all* relevant laws (including labor laws, endangered species or other resource protection laws, etc.) in the region are adhered to. This may go without saying but it is important and should be made a very clear requirement, especially because there are many areas where compliance with national and international resource management laws is very poor.

- *FT USA Response:* Rather than add a general statement about adherence to national and international laws, we have included individual compliance criteria to ensure specific laws are being followed (e.g., regulations concerning endangered, threatened, and protected species). This method decreases ambiguity and allows auditors to check specific criteria, thereby increasing the likelihood of finding non-compliance issues.

For the most part, but there is a concern that a fishery could be having a really significant impact on an endangered species even if the catch of that endangered species is <10% of any one species landings. In the current draft, minor bycatch species that are ETP species can be assessed with just PSA and even in cases where the PSA score is >2, the fishery only has to ensure that the fishing pressure does not increase. However, it has not been established that the fishing pressure on that species isn't too high to begin with. In fact, I would be concerned that a fishery could be impacting an ETP species even when the species scores <2 on a PSA. Because endangered species are typically so rare, even with relatively low PSA scores and few interactions per year, a fishery can still be having a significant impact on endangered species. I would recommend the fishery need to conduct some additional analysis to demonstrate that the impact of the fishery is not endangering the population (eg a population viability analysis, PVA). Even though this is more data intensive, I think it is important to err on the side of the precautionary principle when it comes to endangered species (so if the fishery doesn't have the data/analysis to demonstrate their impact is sustainable, they cannot be certified unless they can eliminate the catch or mortality of endangered species entirely). There are also existing resources that may help in some cases to make the case that the fishery is not having a significant impact, e.g. a thorough review by Wallace et al. (2013) of the bycatch threat to sea turtles in different regions (though this doesn't cover all gear types). See <http://www.esajournals.org/doi/pdf/10.1890/ES12-00388.1>

- *FT USA Response:* We agree and have added a criterion that states "There is an analysis that shows the fishery does not pose a risk of serious or irreversible harm to the population viability of ETP species."

The only other major concern I have is whether there is any third-party validation that key elements of an effective management strategy (also including a rebuilding strategy if applicable) not only exist, but are effective or likely to be effective. There are numerous examples of fisheries that have had these elements in place but they've not been effective. Perhaps in lieu of more formal analysis or a solid track record of data, the CB could seek expert opinion from 2-3 neutral fisheries management experts that the management plan elements seem likely to succeed.

- *FT USA Response:* We have added this suggestion to the interpretation guidance of the criterion concerning annual reviews of the Fishery Management Plan.

An additional suggestion would be to incorporate some more precautionary requirements for fisheries that are targeting forage or low-trophic-level species to ensure predators are not impacted. Please see the Lenfest report <http://www.lenfestoccean.org/foragefish> and the MSC criteria, p. 221-224 <http://www.msc.org/documents/scheme-documents/msc-scheme-requirements/msc-certification->

[requirements/view](#) for more details. Both of these documents also have operational definitions for forage or low trophic level species that you could use.

FT USA Response: We thank you for the suggestion; however we have opted to not include regulations specifically targeting forage fish at this time. We believe the criteria concerning overfishing and overfished status link directly to protecting low trophic-level species and their predators. Such species are clearly important to the overall health of the ecosystem, and we hope by increasing fishermen's conservation efforts and general awareness of the marine ecosystem and the effects of fishing, the Capture Fisheries program will have a positive effect on fish throughout the food chain. We will, however, consider this recommendation for future iterations of the Capture Fisheries Standard.

New England Aquarium:

RM – BD 1.3: Not really sure I understand this. What do they mean by "designed a system"?

■ *FT USA Response:* This criterion has been edited to increase clarity. It now states, "A system is in place to ensure any ETP species caught by registered fishers do not have consumable value to registered fisheries, defined as sold, eaten, or traded."

RM – BD 2.1: The table and associated text should be copied into the Fair Trade glossary or appendix rather than having people go to the MBA doc to reference it themselves, especially since the reference is subject to change.

■ *FT USA Response:* The table referenced in RM – BD 2.1 (now RM – BEP 1.2) was added to the appendix of the Standard.

RM – BD 2.2: This might not be possible for certain fisheries, given gear types and the substrates they fish over.

■ *FT USA Response:* The habitat impact section has been updated to include opportunities for mitigation efforts, thereby increasing the total habitat impact score. Such efforts include switching to less harmful fishing gear where possible or reducing fishing intensity or the fishing footprint through spatial management.

WWE:

There is mention of fish habitats, but it is not clear if this means other associated habitats such as mangroves. A fishery could potentially do a lot damage done to habitats and ecosystems and still be eligible for Fair Trade. We believe that more attention must be given to habitat and ecosystem criteria.

FT USA Response: We have chosen to focus specifically on habitat encountered by the fishery in this version of the Standard. However, we will be reviewing the Standard at the completion of our piloting period, and we will take this comment under consideration for future iterations.

Also, there could perhaps be stronger and more specific requirements around the use of illegal/extremely destructive fishing methods (dynamite, cyanide, hookah dive), all of which would also constitute hazardous fishing that would be in conflict with other (social) requirements in the standard.

■ *FT USA Response:* A criterion was added stating explosives, cyanide, bleach, and/or all other poisons may not be used.

RM - BD 1: We suggest adding requirements that systems be in place to 1) inform and train fishers about how to avoid ETP species and release them with minimum harm, and 2) record, monitor and reduce any amount of any ETP capture in the fishery.

FT USA Response: Criteria on the data collection and monitoring of ETP species can currently be found within the Capture Fisheries Standard. In addition, registered fishermen are required to use industry-recognized best practices and available technology to avoid ETP species. If additional training is required, the certificate holder is responsible for covering the costs.

RM-BD 1: Re: ETP: How can monitoring of ETP landings/discards be monitored – logbooks?

FT USA Response: ETP species fall under the secondary and bycatch species classifications. Records of both landings (for secondary species), and discards (bycatch species) must be recorded. Please see the Data Collection section in the Standard for more details.

RM-BD 1: In the case of sharks, you may want to consider a requirement for the landing of carcasses/fins intact.

■ *FT USA Response:* Determining whether or not shark finning is occurring is notoriously difficult, given the ease of hiding the fins. Having thoroughly contemplated this recommendation, we have added language stipulating all registered fishermen must comply with all local, national, and international laws regarding shark finning. If shark finning becomes a larger issue among Fair Trade Certified™ fisheries, we will adjust the Standard at that point.

RM-BD 1.2: Should also require that the strategy is actually effective – you can have an FMP that just doesn't work.

FT USA Response: Where strategies and plans, such as the Fishery Management Plan, are required, the Capture Fisheries Standard contains criteria stating those plans must be routinely reviewed and updated where necessary to ensure they are effectively reaching the stated goals.

RM-BD 1.2: How will the strategy be monitored?

FT USA Response: This strategy will be monitored through annual audits. In addition, the certificate holder is responsible for ensuring fishermen participating in the Fair Trade program are adhering to the regulations within the Capture Fisheries Standard. This includes ensuring fishermen are complying with all ETP species laws.

RM-BD 2: Re: “Fishing gear does not cause severe harm to benthic habitat”: Is there an actual recent peer-reviewed scientific paper that ranks ‘moderate-severe habitat impacts from fishing gears’? We strongly encourage these criteria (and all others) to be based on peer-reviewed scientific literature.

FT USA Response: The habitat impact section utilizes Monterey Bay Aquarium’s Seafood Watch impact scoring system, which in turn is based upon peer-reviewed literature concerning the impact of fishing gear on various types of substrate.

RM - BD 2: This criterion should ensure that important/sensitive habitats or areas are identified and protected from fishing activity (e.g., protecting important nursing grounds for marine life). This requirement would also protect the fishers’ nets (which cost money to mend/replace) from rocks, reefs, and other hazards.

■ *FT USA Response:* Protecting ecologically important and/or sensitive habitats or areas is important for ecosystem stability and continued sustainability. Guidance has been added to the Standard based upon this recommendation.

RM-BD 2: What about habitat impacts other than benthic? Gear loss? Ghost fishing?

■ *FT USA Response:* A criterion was added under Biodiversity and Ecosystem Protection that states, “A strategy has been developed and implemented to minimize, and where physically possible recover, fishing gear lost at sea.”

RM-BD 3.1: Will fisheries be given guidance on this?

■ *FT USA Response:* Yes, we have written guidance for this criterion to assist fisheries in meeting this requirement.

RM-BD 3.2: How are metrics to be reviewed and tracked? How to ensure that they are appropriate and revised if necessary?

FT USA Response: RM - BEP 2.4 states, “The ecosystem monitoring strategy is reviewed on a yearly basis and necessary adjustments are made to improve its effectiveness or collection of the desired information. Any changes must be assigned the necessary resources (time, equipment, responsible parties, etc.).” This will ensure the metrics are reviewed and revised if necessary.

5.4. Fisheries Management (FM)

Much like the Information to Support Resource Management section, the Fisheries Management section was divided into two parts to increase clarity: Fishery Documentation and Governance. Criteria for the Fishery Management Plan can be found within the Fishery Documentation section. Criteria about illegal, unreported, and unregulated (IUU) fishing and co-management can be found within the Governance section.

Ecology Action Center:

We would like the standards to specify where the vessels will be registered and licensed (local, national or international registries). International best practice requires adherence FAO and IMO guidelines.

■ *FT USA Response:* Clarification was added to this criterion stating “Vessels should be registered and licensed with the appropriate local, regional, and/or national government body.”

New England Aquarium:

Along these lines, the standard should also include third-party validation that key elements of an effective management strategy (also including a rebuilding strategy if applicable) not only exist, but are effective or likely to be effective (RM-FM 1-5). In many cases, fisheries have these elements in place, but they are ineffective, and therefore do not align with the intent of the criteria.

■ *FT USA Response:* We have added this suggestion to the interpretation guidance of the criterion concerning annual reviews of the Fishery Management Plan.

Waitt Institute:

Getting vessels registered and licensed may be harder than you think.

FT USA Response: This may be true, however, we believe legally registering and licensing fishing vessels is critical to reducing IUU fishing and eliminating human rights violations onboard fishing vessels.

Wild Salmon Center:

In the resource management standard, Section 5.4, there needs to be some method for addressing risk and uncertainty. Some of the risk based assessment framework addresses this need from a performance assessment standpoint for data-deficient fisheries, but it would be desirable to have some expression at the management system level as well. For instance, the sophistication or intensity of management plan approaches, including decision criteria, should be appropriately scaled to the intensity of the fishery. There might be a range of system approaches from passive to active depending on the nature of the fishery.

■ *FT USA Response:* We have added a criterion concerning the use of the precautionary principle when determining controls on fishing mortality in an effort to address the inherent uncertainty and risk associated with data, stock assessments, and fishery management regulations.

The draft standard for wild capture fisheries doesn't currently contain any performance dimensions for fisheries that include contributions from artificial production. The original MSC standard and Monterey Bay Aquarium's assessment criteria had a similar history but subsequently underwent modifications to incorporate performance dimensions related to cultured fish released into the wild. We have some direct experience in this area from providing consulting expertise to the abovementioned schemes as well as related provisions of FAO's inland fisheries ecolabelling guidelines. While the likelihood of encountering 'enhanced fisheries' may be low in situations where the FTUSA standard might be used, we would suggest that performance criteria be incorporated into the standard, or alternatively that an initial scope decision be made upfront to exclude enhanced fisheries from the certification program until the time that such criteria can be added.

FT USA Response: Fair Trade USA has made a conscious decision to solely focus on capture fisheries at this point in time. However, we recognize that enhanced fisheries would provide opportunities to both expand the Fair Trade program and help additional fishermen and their communities. Our hope is once the Capture Fisheries program is off the ground and fully stable we will be able to expand our sights.

WWE:

RM – FM: We suggest adding a requirement to educate other marine users/stakeholders, schools, local authorities, etc. about important factors that could affect the sustainability of the stocks/resources. This would work to break down the silos that currently exist, pave the way for more holistic management and understanding of the coastal zone, and encourage the multi-stakeholder participation that is needed to effectively manage marine/coastal resources.

FT USA Response: We agree education is an important component of effective environmental conservation. Although we did not add the suggested requirement to the Standard, we continually recommend that fishermen use the Fair Trade Premium on community-based projects. Our hope is through this process, fishermen and their communities will start to become more engaged in Fair Trade, and in turn become more engaged in environmental stewardship and conservation.

RM-FM 1.4: The format/discussion at a workshop seems less important than actually developing an FMP that is effective.

■ *FT USA Response:* We agree that an effective Fishery Management Plan is important to successfully managing sustainable fisheries. The criterion related to annual updates to the Fishery Management Plan was modified to read, "The Fishery Management Plan is reviewed annually and updated where necessary to ensure the management plan is effectively reaching the stated goals."

RM-FM 2/2.1: This should read "vessels used by ALL fishers are legally registered..." Otherwise, you're just confirming that registered fishers are registered.

FT USA Response: Fair Trade cannot force fishermen not participating in the Fair Trade program to adhere to the regulations within the Standard. However, it is our hope that most, if not all fishermen within Fair Trade Certified™ fisheries will register with Fair Trade. This in turn would mean their fishing vessels are also legally registered.

RM-FM 2.1: Re: vessel registration: Gear registration could be an alternative option to vessel registration for SSF.

FT USA Response: That is a good idea and one we will take under advisement for fisheries where registering vessels proves abnormally difficult.

RM-FM 3: Re: illegal fishing: We suggest adding a specific category for anti-IUU measures. Additional requirements may be warranted such as maintaining a good track record with regard to violations, applying MCS systems where the fishery has a history of IUU, etc.

FT USA Response: While we have not included criteria specifically regarding anti-IUU measures, we will take this comment under advisement for future iterations of the Standard.

RM-FM 3.1: How is illegal/legal fishing verified? Logbooks? Observers? This links to other sections. We suggest clarifying and specifying detailed IUU requirements.

FT USA Response: As with any component of the Capture Fisheries Standard, the requirements to comply with fishing laws are verified through the audit process. The certificate holder is responsible for ensuring registered fishers are adhering to the Standard, including obeying all local, national, and international laws concerning fishing practices.

RM-FM 3: Perhaps IUU measures should be articulated in Year 0.

FT USA Response: In many cases fisheries will not be sufficiently organized to develop an IUU strategy by the Year 0 audit. This is why we placed this criterion at Year 1.

Where references are made to no IUU activity, a definition for IUU must be provided. Given the reporting requirements of the standard it may be possible to prove that there is no unreported catch in the products, but the FA must also demonstrate that there is no unreported activity being undertaken by non-registered fishers that would affect and undermine the registered fishers. Also, the regulatory system put in place under the requirements of the "Fishery management" criteria must be adequate to demonstrate that it is a regulated fishery by accepted standards and definitions. The FT logo should not be associated with any fishery associated with wide-spread practices of IUU taking place.

■ *FT USA Response:* A definition for IUU fishing was added to the Capture Fisheries Glossary.

RM-FM 3.4: How to determine whether the IUU strategy is effective?

FT USA Response: The IUU enforcement strategy must be reviewed annually and updated where necessary to ensure it is effectively reaching the stated goals. Rather than being prescriptive, we have chosen to not specify how this is done. However, we will provide guidance to any Fair Trade Certified™ fishery who requests additional information.

RM-FM: Re: monitoring: Consider the “Observe, record and report” (ORR) approach – fishermen monitor each other’s activities.

FT USA Response: We have taken this comment under advisement and will consider including the ORR approach in future iterations of the Standard.

RM-FM 4: Re: “The FA is actively involved in the management of the fishery, according to a comanagement agreement”: While important to include co-management, this may be inapplicable in some fisheries and should probably not be a requirement. Also, where applicable, co-management objectives should be identified and planned in Year 0 (does not appear to be mentioned in other criteria).

■ *FT USA Response:* Although we elected to keep the first co-management criterion at Year 1, we have added guidance to all co-management requirements that states, “In exceptional circumstances where co-management of the fishery is not appropriate, an exemption to this criterion may be granted. In such cases, the certificate holder and relevant fishery management authorities must demonstrate together why co-management is not appropriate.”

RM-FM 4.3: This should happen before year 6.

FT USA Response: Successfully achieving co-management agreements between government agencies, managing bodies, and fishermen can take years, even in regions with highly-managed fisheries. The intent behind the co-management criteria is to start building that process. We fully support any fishery where creating a co-management system moves faster than the timeline laid out in the Standard, however we have elected to keep the current yearly requirements.

RM-FM 4.4: What about implementation? Monitoring? Effectiveness?

■ *FT USA Response:* A criterion was added stating the co-management action plan must be reviewed annually and updated where necessary to ensure it is effectively reaching the stated goals.

RM-FM 5: Re: “There is a procedure for resolving conflicts among fisher groups, the FA, and the legally responsible agency over the management of the fishery and the use of the fish resources”: This is important, but why wait six years to identify conflict and resolution strategies? Facilitated consultations, problem identification, root cause analysis and objective-setting, etc., are common methods used early in fisheries intervention and should be required earlier.

FT USA Response: The criteria for this requirement are associated with the Year 3 audit.

RM-FM 5.1: We suggest adding a requirement that the procedure put in place is actually shown to be effective.

■ *FT USA Response:* We have added guidance to this criterion specifying “It is recommended the conflict resolution procedure is reviewed on a regular basis and updated where necessary to ensure its effectiveness at resolving conflict.”

5.5. Waste Management (WM)

New England Aquarium:

WM Intro: This means that not all fisheries will be assessed on the same criteria. Some will be assessed on more criteria.

FT USA Response: The waste management section is applicable for all processing facilities that fall under the scope of the Capture Fisheries Standard. If processing facilities are not within the certification scope, they will not be assessed against these criteria. Information on the certification scope can be found within the Standard itself.

RM – WM 1.1: If there is hazardous waste in processing, then there need to be safety controls for the workers. Should this be all waste, just not hazardous?

■ *FT USA Response:* We agree and have augmented the language in this criterion to reflect this recommendation.

RM – WM 2.2: Strengthen this statement. There should be a waste water management plan.

■ *FT USA Response:* Recommendations for a waste water management plan were added to the interpretation guidance for this criterion.

WWF:

RM-WM: Would it be possible to relate expectations to the widely applied ISO standard 14001? It is always good to refer where possible to these other widely applied standards in order to encourage application (people know that they can tick boxes for two standards at once).

FT USA Response: We have decided to not include a specific reference to ISO 14001 in this version of the Standard, although our approach to risk management and internal control systems is similar. We will take this into consideration for future iterations.

RM-WM: Hazardous waste should also include the disposal of fishing gears at sea – e.g.no cutting away of nets, etc.

■ *FT USA Response:* The waste management system is only applicable for processing locations. However, a criterion was added to the Resource Management section of the Standard that states, “A strategy has been developed and implemented to minimize, and where physically possible recover, fishing gear lost at sea.”

6. Trade Requirements (TR)

As previously mentioned, traceability throughout the processing and supply chains is an important component of all Fair Trade USA certified products. For the Capture Fisheries program, we require a traceability system that is able to track a fish from its landing point to the final buyer. Most of these requirements are contained within the Fair Trade USA Trade Standard, available for download [here](#).

6.1. Basic Requirements (BR)

WWF:

TR-BR: Traceability underpins certification and legality. Is there no ISO standard or more detailed prescription as to the level of traceability required in FT products? There should be a requirement for training workshops for the fishers on traceability after the General Assembly has been presented the work on the options for traceability. Documentation in the form of guidance or a handbook could be developed on this for the fishers (it could also include other aspects important for the certification).

FT USA Response: More details on traceability requirements can be found in the Fair Trade USA Trade Standard. A training handbook for fishermen on traceability is a good idea, and one we will take under consideration.

6.2. Product Sourcing (PS)

Comments received in this section have been addressed in other parts of this document.

6.3. Physical Product Traceability (PT)

Ecology Action Center:

We are encouraged by this requirement. We would like to see the other certification standards for the production, processing, manufacturing and handling of the product included as an appendix so that stakeholders can review them as well. We are concerned, however, about the viability of this statement given that most fish in the global supply chain travels outside of the country of catch before then getting exported to markets. We think that certifying the entire supply chain is critical to the success of this project. Registration or certification of post-harvest entities must be further defined. In many cases, it is mandatory for seafood products to be landed at a federally licensed fish processing plant. Often these plants bring in product from both small scale and industrial fisheries, and there is only one plant in a fishing village. If the plant is ineligible for Fair Trade certification or registration, the small scale fishermen will also be ineligible-which is not fair.

These certification standards are important for ensuring the rights and proper compensation of workers throughout the fisheries supply chain. However, as mentioned above, we strongly assert that the complexity of the global fisheries chain requires further examination in light of the realities of small-scale fisheries.

FT USA Response: To clarify, depending upon the supply chain of a given fishery, a processing plant may not be within the scope of the Capture Fisheries Standard, but rather within the scope of the Trade Standard (for traceability only). Our hope is that as the program grows and expands, fishermen will be able to sell to more than one buyer, and fishers will become empowered to take on aspects of the supply chain themselves. It is true, however, that we are dependent upon an integrated supply chain solution, and we welcome ideas for overcoming this issue.

WWE:

TR-PT 1: Traceability and ensuring no product mixing will be very difficult for many small-scale fisheries. Guidance on this should be provided.

FT USA Response: We are happy to work with fisheries and processors that need to implement and/or improve their traceability systems by connecting them with organizations and companies that specialize in such systems.

6.4. Traceability through documentation (TD)

WWE:

TR-TD: Full/actual traceability should be required well before Year 6. Also, the criteria seem at odds: how can you be sure that a fishery meets TR-PT in Year 0 without the documentation required in TR-TD (in Year 6)?

■ *FT USA Response:* The traceability section was updated to better reflect the importance of traceability; it now requires a traceability system be in place at the first sale of Fair Trade product. By making this change, the timeline for required documentation is now better aligned with the rest of the section.

6.5. Agreements (AG)

No comments received for this section.

6.6. Contract Suspension (CS)

Waitt Institute:

This is confusing as it seems to imply that business continues even when there is a suspension.

FT USA Response: Business does continue during a suspension, but only in order to fulfill contracts that were signed prior to suspension. When this occurs, product is traded under defined terms and limitations specified within the Fair Trade Standards. Failure to resolve the suspension will result in decertification, at which point no product can be traded and all existing purchasing contracts concerning Fair Trade products are nullified.

6.7. Decertification (DC)

No comments received for this section.

6.8. Use of Fair Trade Trademark (FTT)

No comments received for this section.

Appendix: Capture Fisheries Glossary

A. Small-Scale Fishers Definition

Overwhelmingly, stakeholders stated the need for edits and additional clarity in the definition of small-scale fisher/fishery. Given the high variability of small-scale fisheries around the world and the multiple policy and management definitions of this category, the definitions suggested by commenters varied themselves, focusing on boat capacity, gear type, number of fishermen, fishing licenses, post-harvest value chain, and/or social and institutional characteristics.

After considering the feedback and reviewing the literature on small-scale fisheries, we have decided rather than define the term, Fair Trade USA will use a combination of factors when determining whether or not a fishery should be categorized as small-scale. As shown in the updated Capture Fisheries Glossary, we are utilizing information in the table below. Refraining from creating a strict definition of small-scale fisher/fishery will allow Fair Trade USA to engage in a wider range of fisheries while still maintaining the intentions behind the program of empowering small-scale fishermen and their communities. In places where a national definition of small-scale exists, we are open to working within that definition.

Key features	Common definition (range)
Boat size	between 5-7m; less than 10, 12 or 15m (2 to 24m)
Boat GRT	less than 10 GRT (3 to 50 GRT)
Size of engine	less than 60 HP; between 40-75 HP (15 to 400 HP)
Boat type	canoe, dinghy, non-motorized boat, wooden boat, boat with no deck, traditional boat
Gear type	coastal gathering, fishing on foot, beach seine, small ring net, handline, dive, traps
Distance from shore	between 5-9 km; within 13 km; up to 22 km
Water depth	less than 10, 50 or 100m depth
Nature of activity	subsistence, ethnic group, traditional, local, artisanal
Number of crew	2-3; 5-6
Travel time	2-3 hours from landing sites

B. Additional Definitions

A few stakeholders also commented on additional definitions in the Capture Fisheries Glossary (e.g., bycatch, endangered, threatened, and protected species, limit and target reference point, overfished, overfishing, and fisher). Recommendations included increasing the robustness and clarity of the definitions by using internationally-agreed upon definitions, such as those from FAO. Commenters also recommended removing terms that do not appear in the compliance criteria and adding terms in the Standard that were left out of the glossary.

In total, over 30 terms were added, removed, and/or updated to more fully align with the Capture Fisheries Standard and reference widely agreed-upon definitions within the industry.

⁵ Chuenpagdee, R., Liguori, L., Palomares, M.L.D., and Pauly, D. (2006). Bottom-Up, Global Estimates of Small-Scale Marine Fisheries Catches. Fisheries Centre Research Reports, 14(8). The Fisheries Centre, University of British Columbia.