

Attention:  
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**Re: Formal Comments of WWF Coral Triangle Programme - Asia Pacific Sustainable Seafood and Trade Network (APSSN) in reference to the Regional Fisheries Improvement Project (FIP) Protocol for the ASEAN**

March 31, 2014

Dear Corey:

Firstly we'd like to congratulate you and the MARKET team for the progress to date in developing a Regional Fisheries Improvement Project (FIP) Protocol for ASEAN.

At this juncture in the process and with the first Steering Committee meeting to be convened on April 1<sup>st</sup> and 2<sup>nd</sup>, the Asia Pacific Sustainable Seafood Network (APSSN), on behalf of WWF Coral Triangle Programme, wishes to take this opportunity to summarize our position with respect to the FIP Protocol for the ASEAN, as outlined below:

**1. FIP Standard or FIP Protocol**

We acknowledge the need for this to be a consensus driven process and that this necessarily requires an exploration of various "Standards" or benchmarks available. There has been a recent proliferation of "private" standards schemes in response to failures in public standards and regulatory frameworks to achieve specific outcomes around sustainability, responsible fisheries management, foodsafety assurance and traceability or to differentiate products in the marketplace. These standards differ in terms of content, certification and verification methods, standards development, and focus (see #2 below).

Standards, and the certification systems sitting behind them, are a way of compensating for *information asymmetry* felt by most consumers around certain aspects of seafood products or their production processes. This veracity of the standard is the key its usefulness in bridging that *asymmetry*.

A question we would pose is "What is the purpose of applying a Standard here?" The effectiveness and applicability of any Standard will be in its ability to not only qualify an expected level of environmental performance but to quantify and evaluate the existing level of performance against an agreed benchmark or scale. While acknowledging the criticisms and political sensitivities that accompany the application of the Marine Stewardship Councils (MSC) Principle and Criteria in a developing world context we do have concerns that looking to prioritize an alternative Standard is potentially fraught, especially in the context of benchmarking for Fisheries Improvement Projects (FIPs), given existing stakeholder commitments to the FIP process.

With this background, our position is that the scope of this project should focus first and foremost on a FIP “Protocol” and that the project should exercise considerable caution in looking to a new “Standard” to support that protocol. With regards adoption of a new Standard, we have concerns that such a pursuit is not only contradictory (and potentially detrimental to long-term sustainability and food security) but also unlikely to gain crucial acceptance outside the ASEAN region. Our overall rationale for this includes:

- i. Environmental Performance – The MSC performance indicators remain the most robust criteria for measuring fisheries improvement (and the only suitable Standard for addressing environmental issues comprehensively). We strongly feel that any new Standard risks lowering the bar in terms of environmental outcomes and for diminishing the basis of what is considered a “credible” fisheries improvement project;
- ii. Existing Guidelines – There is a need to acknowledge that guidelines as to what constitute “credible” industry FIPs already exist, which have been agreed to by the Conservation Alliance for Seafood Solutions a group of 16 NGOs working on sustainable seafood initiatives. These guidelines, which are benchmarked against the MSC, establish minimum FIP criteria and supported by major buyers in European, North American, East Asian and Oceania regions;
- iii. Market Acceptance – Following from above we believe there would be myriad of concerns raised by NGOs, industry partners and retailers currently engaged in and/or supporting current FIPs should the scope be developing an alternate Standards approach i.e. that does not meet the rigorous nature of existing schemes such as the MSC. We feel such a Standard would not be recognized outside of the ASEAN geography and have little or no market influence, an important lever to influence change in fisheries management;
- iv. “Protocol” vs. “Standard” – The fact that a “Protocol” for FIPs in ASEAN may be useful (i.e. for fisheries where MSC certification is particularly unrealistic), in our view this does not in any way justify “lowering the bar” from an environmental perspective. Tools and approaches under a suggested ASEAN FIP Protocol can help expand the relevance and implementation of FIPs (see below); however, they can and should still be pegged to the highest Standard in order to ensure credibility, consistency and ultimately market relevance outside of ASEAN; and
- v. Developing a new or evolving an existing Standard to backstop or benchmark an ASEAN specific protocol would be a time intensive and costly exercise both in terms of technical content and building market recognition (see below for suggestion regarding benchmarking)

In summary, while recognizing the shortcomings of MSC, we think developing an alternative to the MSC is fraught with danger and moreover represents a significant undertaking. Over and above the investment needed to create a new benchmark, the bottom-line reality is that these tools will not have the international credibility and hence support of the market.

## **2. Draft Environmental Compliance Points (Good Fish Code and Seafood Watch)**

With regard to the documentation circulated to facilitate the discussion of the “Meeting to Draft a Regional Fisheries Improvement Project (FIP) Protocol for ASEAN”, we have some concerns specifically with the use of only the Good Fish Code and Seafood Watch criteria, and the focus of the (environmental) discussion being around these.

There are more than forty (40) schemes operating in fisheries and aquaculture that can be classified as being one or more of the following; a Standard, a Code, Guidelines, a Label or a Certification Scheme (Washington and Ababouch, 2011). These standards and certification schemes target either specific national or global markets, and address a range of market access issues such as; i) food safety, animal health, environment, social/ethical or food quality.

While recognizing Seafood Watch Fisheries Assessment Criteria (SFW) and the Good Fish Code (GFC) are posited as examples, importantly, for the purposes of this discussion, both are regarded as codes not “Standards”. Moreover, Fairtrade as a standard is primarily a set of minimum standards for ensuring production and trade of a product is socially and economically fair and environmentally responsible.

While we do not see the issues around use of these schemes as necessarily contributing to the concerns we outlined in #1 above, we would highlight that these examples are “codes” rather than “standards” for assessing fisheries and/or species status and as such not particularly useful in establishing a baseline and progressively measuring improvements within a fishery (i.e. FIP action plans and tracking etc.). While these criteria may be useful goals for fishery managers and industry to aspire to, we do not see how they would be applied within a FIP “Protocol”, and would seek further clarification on this. Any proposed new tool or benchmark must be capable of providing a robust evaluation framework and scoring system (see #4 below).

## **3. FIP Protocol**

As noted, we are supportive of a Protocol approach as this has the benefit of being more generic, with its implementation tailored to the fishery situation and country.

An important focus for Protocol content should be on providing guidance on dealing with the suite of “lower-tier” fisheries<sup>1</sup> deemed less suited to the current FIP benchmarking guidelines. The protocol should also include elements of national capacity building to strengthen management in support of FIP work (FAO, 2012). We offer the following suggestions on approach/principles for working with such “lower tier” fisheries while simultaneously seeking not to compromise any stakeholder interests or environmental robustness:

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<sup>1</sup>Lower-tier” fisheries are regarded as those fisheries which fall far short of the MSC Standard in terms of the fishery performance against the MSCs minimum Scoring Guidepost criteria (i.e. SG <60) and where MSC certification is an unrealistic goal with a medium to longer term timeframe

- i) Begin all “FIPs” with a MSC pre-assessment followed by FIP Action Plan based on MSC;
- ii) In order for the above to be practical, relevant and affordable, first develop national-level capacity to undertake pre-assessments based on the MSC Standard and to develop FIP Action Plans. Note that considerable resources and toolkits are currently available to move forward on this (see #5 below), aimed at making MSC pre-assessments and FIP engagement less costly and more “organic” for the region;
- iii) Where scoring against MSC guideposts may leave the fishery below the “SG 60” threshold (and thus without suitable progress indicators), identify a timeline for achieving a minimum SG60 score (i.e. where “robust” FIP benchmarking can be applied, as currently);
- iv) Further to iii) above, based on pre-assessments provide clear guidance, specific activities, budgets, identified resources, roles and support mechanisms etc. for helping the fishery to such a pivot point
- v) Alternately, in recognition of fisheries with a high number of indicators that score below SG60, explore options to develop progress indicators for those criteria below SG60, The message here is “don’t throw the baby out with the bathwater” rather build on existing frameworks where practicable;
- vi) Consider expanded timelines for the above, as well as removing where appropriate any requirement that the fishery and/or its supply chain and managers “commit” formally to MSC certification as the end goal

We further add that rather than a full FIP, the Protocol could recognize stepwise FIP approach (what we in WWF call a Fisheries Conservation Project (FCP)).

We envision several other key elements of a Protocol, including improved capacity through activities such as describe below in #5; however, at this stage we strongly recommend the FIP Protocol endorse a general orientation that remains pegged to MSC in terms of fishery assessment and tracking improvements, while being more open and flexible where appropriate.

#### **4. Social Standards/Protocols**

We recognize there are standardsetting bodies that exist which address social and ethical issues. We also acknowledge the MSC does not address social issues within its Fisheries Assessment Methodology and is unlikely to do so in the near future.

The question of whether to address social issues including slave boats, bonded labour, inhumane treatment of crew, human rights abuses and the like, has been identified and discussed by the FIP Protocol Steering Committee. Our understanding is that a decision on whether to include or exclude social performance indicators from any such FIP Protocol is yet to be resolved by steering committee members and broader stakeholder community. We intend to respect the consensus of the group in relation to this issue.

## **5. Ideas on Support for FIP Protocol through the Asia Pacific Sustainable Seafood Network (APSSN)**

The APSSN as a regional seafood platform is keen to be open and helpful and work closely in developing a relevant and applicable ASEAN FIP Protocol. We would like to use this opportunity to convey some preliminary ideas for possible APSSN support for - and engagement in – the FIP Protocol work moving forward:

- i. Deliver national level capacity building and training for qualified businesses and individuals to become proficient in developing and implementing Fishery Improvement Projects including
  - a. Fishery Pre-assessment and gap analysis
  - b. Preparation of fishery Action Plans and Implementation plans to monitor improvement progress
  - c. Auditing and accreditation of fishery performance as part of meeting market access criteria
- ii. Convene FIP coordination workshops and exchanges to share lessons learned and ideas;
- iii. Support ongoing policy advocacy at national and regional scales to facilitate fishery improvement;
- iv. Assist in dissemination and understanding of the ASEAN FIP Protocol approach to various government, NGO, industry and scientific stakeholders;
- v. Assist in the piloting of the FIP Protocol– where appropriate, through informal testing of any future ASEAN FIP Protocol, in the field with newly-emerging and or future FIPs with which the network is involved. This includes applying new FIP capacity and “mentoring” structures where national capacity for MSC pre-assessments and FIP Action Plan development work with experienced assessors etc

## **References**

Washington, S. and Ababouch, L. (2011). Private standards and certification in fisheries and aquaculture: current practice and emerging issues. *FAO Fisheries and Aquaculture Technical Paper*. No. 553. Rome, FAO. 2011. 181p.

FAO. 2012. *APFIC/FAO Regional consultative workshop: strengthening assessment of fisheries and aquaculture in the Asia-Pacific region for policy development*, Yangon, Myanmar, 4–6 October 2011. FAO Regional Office for Asia and the Pacific, Bangkok, Thailand. RAP Publication 2012/12, 50 pp