NOAA Sustainability Certification Overview

ASMI Board Meeting April 23, 2014

Background

- Due to stakeholder requests and increasing public interest in mid-2012, NOAA fisheries asked MAFAC to explore the creation of a NOAA Certification mark or other acknowledgement that could certify sustainability of domestic wildcaught and aquaculture fishery products.
- MAFAC conducted review and recommendation that is now up for public comment. Public comment is due by April 30, 2014

Description

- The MAFAC recommendation includes a B2B framework offering value to seafood industry consistent with NOAA Fisheries legal authorities and minimizing conflicts with existing third-party ecolabels
- Initially focus on wild-caught seafood from Federally managed waters
- Phase in a process derived from state-managed commercial fisheries (if requested) or aquaculture

MAFAC Recommendation: Core concepts.

- * Fee-for-service.
- * Business-to-business, not consumer-based.
- Rely on the principles in the Magnuson Act.
- * Use existing resources:
 - * Enhance FishWatch.
 - Seafood Safety Inspection Service
- * Accept limitations on scope: don't solve everything.

MAFAC Recommendation: Comply with U.S. Fisheries Laws

- * "Sustainable U.S.A. seafood"
 - Wild-caught fishery products
 - * Caught by U.S. fishermen, landed in U.S. ports
 - * in accordance Magnuson Act (and other fisheries laws).

* AND

- * fishery stock status is known;
- fishery is not overfished;
- * no overfishing occurs.

If overfishing or overfished or if rebuilding plans exist, NOAA needs more criteria after receiving feedback from other stakeholders.

MAFAC Recommendation: Traceability

- * Fishery products must be traceable
 - * Sellers must show sustainable, legal, domestic source
- Traceability mechanisms can be flexible
 - Credible, audited chain-of-custody program
 - Paid for by seafood sellers
 - Can use third-party products



- NOAA Seafood Safety Inspection Service audits
 - Evaluates adequacy of traceability documentation
 - * NOAA Fisheries develops policies or rules with criteria

MAFAC Recommendation: Registration, displayed on FishWatch

- Create a verification process to so buyers can identify products registered as sustainable USA seafood:
 - Visit and interact with FishWatch.gov
 - Enter a registration number and confirm status
 - Search for vendors, processors or dealers
- * Each participant in the chain of custody for a fishery product can seek certification and obtain a registration number.



MAFAC Recommendation: Fee-for-service

- * Business to business, so business pays
- * Start-up costs:
 - * Highest estimate \$500,000, others below \$100,000;
 - Depends on adequate legal authority (may need rulemaking)

MAFAC Recommendation: Fee-for-service

- * Recurring costs:
 - * Audits
 - Registration web services
 - * Program-related education and communication expenses
 - * Enforcement and defense of the program from legal challenges.
- * Estimated cost up to \$1.2 million annually
 - * Fee-for-service costs per-participant less than \$1000 per year.
 - * More detailed cost-analysis needed

MAFAC Recommendation: Phased implementation

State waters?

Aquaculture?





Yes, but start with federal waters.



MAFAC: substantial consensus, but <u>NOT</u> unanimous.

DATA CONCERNS

- * Cost-benefit?
- * Global non-acceptance?
- * Sufficient participation?
- * Budget constraints?
- * Outcome assessment?

VALUES CRITIQUES

- * Magnuson is unsustainable
- * Impact to other certifications
- Certification needs 3rd party, not NOAA Fisheries or SSIS
- Omits other important moral or economic factors
- * What about consumers?



Submit a Comment

- By April 30, 2014
- nmfspolicy@noaa.gov

- Trigger Questions:
 - What parts/aspects of the recommendation do you agree with and support?
 - What parts/aspects of the recommendation do you not support? Can you recommend a different approach or changes that you would support?

Considerations

Pros

- Higher acceptability in USA
- No moving goal posts
- Allows Alaska to focus on Alaska marketing messages
- Cost

Cons

- Low acceptability on global front
- Seen as self certification, not independent
- eNGOs won't accept it as they didn't write it
 - These are the retailer partner decision makers
- Lack of measurement
- Budget constraints to maintain and to market
- Conflicting message federal fisheries certified, state not