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 wild-caught 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 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 **NOT** 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