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| **Evaluation Process: Consultation Responses and Proposed Amendments** | | | | |
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| Section | | Comment | Proposed Response | Amended Text |
| Introduction and General Comments | 1.1 | “small-scale fisheries”: Consider adding something about your intent of who this program is intended for here, in addition to defining "small-scale" later. We appreciate your language about this program being for fisheries that are grounded in and support local communities. | Yes. We will present this information (and already do) in the general information on the Community Catch initiative. Within the Process and Standard we need to be more precise, so that CABs can make clear and consistent decisions. | To be made clear in the general information on the Community Catch Initiative. |
| | 1.2 | Suggest there is also recognition of a term/definition for ‘sustainable’ within the context of fisheries meeting the standard. “in order to claim to be sustainable”: Recommend changing this language as it is too heavily focused on saying that the standard is the definition of sustainability. Recommend changing to "... in order to be recognized in the Community Catch program." | The standard addresses a number of very different issues, from stock status to labour conditions. There is no clear definition of what 'sustainable' means in relation to all of these issues. Our porposal is that a fishery which meets the Community Catch standard will be operating in a manner which is environmentally sustainable and socially responsible. | No change |
| | 1.3 | Use of a digital platform easily accessible by fishery clients and CABs is an excellent concept so long as there is sufficient internet access and literacy. Can we have definitions for Fishery Client / Group up here before so it’s clear? | We are presuming that anyone able to provide the information required in the Community Catch process will have the resources required (in terms of software literacy) to participate - this will be the role of the Fishery Client. | Definitions of Fishery Client and Fisher Group to be reviewed for clarity. |
| | | A fishery which is in scope and meets all Minimum Requirements will be recognised within the Community Catch initiative as long as ongoing improvements are demonstrated.<br>What does this mean? Does the fishery have market access? | The extent of market access will, of course, be dependent on the purchasing policies of seafood buyers.<br>Community Catch will provide recognition and information (market facing fishery profiles) on fisheries which met our minimum requirements and which are following a path to improvement and eventual certification.<br>Buyers who wish to support fisheries endeavouring to improve the social and/or environmental perfomance of their fishery will be able to use the information provided by CC to identify fisheries doing so. | No change |
| | | Challenge with ongoing improvements occurs when the fishery is close to closing all of the requirements but the final ones are more complex and so showing progress might take longer than other items. This has been a reoccurring challenge with FIPs recently due to their change in assessment model. As such fisheries with technically higher risks are receiving higher ratings than those who have been a part of the process for a longer time and have implemented more improvements. Generally, market buyers do not have this nuanced understanding and it is harming the fishers. | Yes, this is a particular problem when SSF lack agency to address these issues. We are proposing flexible timelines dependent on the number and complexity of issues, and recognition within the CC program to fisheries on an improvement journey. Hopefully then, equal recognition will be given to fisheries in the improvement pathway. | No change |
| | 1.4 | We are a little confused about the statement in this section.<br>Representatives of SSF are not expected to access and work on the documents, but instead “Fishery clients” which later (3.3.1) are described as individuals or organizations responsible for providing information actioning any improvement necessary. | The fishery client could be a SSF representative, or another connected person/organisation (processor, NGO, supplky chain actor, PO, government etc). | Section clarified |
| | 3.3? | Appears to be a misnumbering, as 3.3 appears again after 4.2 | Corrected | Corrected |
| | 3.3.6.1 | Missing period at end of sentence. | Corrected | Corrected |
| | 4.1. | I was not able to find the self-assessment tool. | Our aim is that this will be illustrated in a future consultations | No change |
| | 5.4 | Missing period at end of sentence. | Corrected | Corrected |
| | 5.5 | ‘Organisation’ should be ‘organisations’ | Corrected | Corrected |
| | footnote 5 | Should end in period rather than semicolon. | Corrected | Corrected |
| | Footnote 2 | "such as" implies there is further flexibility. It may be simpler to state that labour intensive refers only to these gears, if that is the case. Otherwise I would recommend a firm definition. | SSF definition is under review. | SSF definition to be developed and tested. |
| | CGK | Digital platform: Innovations need to be compatible with Android phone apps so updates and improved communication and connectivity to the world is assured and accessible to SSF | The digital platform will be web accessible and so available on all devices. | No Change |
| | CGK | Capacity building needs to be a core componenet of an initiative which aims to really support SSFs | This is very much our intent, with connections, information and, eventually, money provided by CC. | No Change |

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| Scope: Small-Scale Fishery Definition | 3.1.2.1 | •For stakeholders unfamiliar with the complexities of vessel size determination, it would be useful to clarify where the 24m L =26.5m LOA = 300 mt equivalency comes from; we presume it is from the IMO. | From IMO and also ILO c188. | No change |
| | 3.1.2.2.b | As part of the small-scale fisheries sector, the vessels and their owners are firmly rooted in local communities, traditions and values3<br>•Footnote 3 states: "'Firmly rooted in local communities' shall be situations where significant beneficiaries are located within communities local to the fishery.". How is a 'beneficiary' defined, here? Fishermen or market sellers may be considered 'beneficiaries', even if a vessel has corporate ownership or ownership based in a different location.<br>•How is an assessor to determine if an owner is 'firmly rooted' in local communities, traditions and values?<br>•There seems to be a mismatch between what the main requirement asks (vessels and their owners are firmly rooted) and the guidance which simply asks that 'significant beneficiaries' are located in the local community – this may not be the owner (and what if it only a single 'beneficiary'). | Yes, this has always been a difficult concept to define. We have been working on a more precise means of defining this, which we will clarify further in the next (30d) consultation. | SSF definition to be developed and tested. |
| | CGK | The definition at present, <24 etc, does not reflect SSFs in Indonesia or in SE Asia and would not be seen favourably by the governments or the fisheries. If vessels of this size are brought into the fishery then the certificatioon cannot be asociated with community and SSFs. | As a global initiative, CC must be able to work with a variety of small-scale fisheries. Perhaps what they all have in common is a close connection to the communities from which they operate. We wish to avoid, as far as we can, discriminatory cut-offs and we wish to be consistent in our aim for accessibility to SSF but at the same time, we must limit our initative to SSF. We are working on options to best define SSF as a scope criterion for CC. | SSF definition to be developed and tested. |
| Scope: Other Requirements | 3.2.2 | It is concerning that all gear types are allowable as some clearly have higher risks and larger impacts on the ecosystem. Whilst some of this may be captured in the assessments, it must be made clear that there are distinctions between gears as, for example, purse seiners (or even mini purse seiners) could never be considered to be as equally low impact as handline fishers – to imply this would be damaging to fishers who do adopt more labour intensive, lower impact gears. If there is no distinction and the standard is "gear-neutral" in its assessments then it raises questions about the motivations and beneficiaries of the standard. I am not saying that the other gears should not be included necessarily, as there is need for all gears to improve and exclusion may not be the best way; however, a distinction is essential. | As above, we do not wish to discriminate between different SSF and gear types. Any gear type can, in theory, meet our standard, the benefit to low impact gears is that the risk posed is lower. Our challenge, very much in our minds, is to reward such lower risk operations by a simpler, faster and less expensive evaluation process. It is not viable for us to introduce further distinctions.<br>Ultimately, we want to recognise all sustainable and responsible fisheries and help those needing it to improve - this is our mission. | No change |
| | 3.2.3 | 'The Community Catch programme is intended for wild harvest operations only'. Suggest this section is moved to the start of 3.2. as the statement more accurately sets the scene for the type of programme it is. Consider specifying whether fishing with poisons or explosives would be in scope, if relevant. Does Wild capture definition include fresh water as well as sea caught? Consider specifying whether fishing with poisons or explosives would be in scope, if relevant. | We very much include freshwater fisheries. Poisons in particular are a very traditional fishing technique. We do not exclude poisons and explosives, but obviously the burden of proof as to their sustainability may well be very high. These scope issues will be confirmed | Confirm scope requirements |

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| | 3.2.4 | Introduced species are allowed within the Programme unless the fishery is based on continuing introductions of non-native species<br>•Given that non-native species introductions are a serious threat to native biodiversity, it is concerning that there is not a requirement for a minimum period (e.g., 10 years) during which introductions have not occurred before a species can be certified. As it stands, there is potential encouragement for introductions of species that may quickly become self-sustaining to areas not otherwise previously impacted.<br>•Given the instant acceptance of non-native species to CC, it is also concerning that there appears to be no requirements related to the safety of introductions, including with regard to checks for disease or other, invasive non-native species that may be carried with the target species. | We understand and sympathise with the intent behind these comments. However, as we go further into such definitions and restrictions, the complexity of the standard will greatly increase - and so the burden on the fishery client in terms of resource requirements and costs. Introductions which have generated a commercial fishery tend, by definition, to be well established anyway - our approach is therefore one of 'this has happened anyway, so lets do what we can to ensure fishers are treated responsibly and wider ecological effects are minimised'.<br>We do not expect that introductions will be influenced, one way or the other, by CC certification. | No change |
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| Scope: Unit of Evaluation | 3.3 | The fishery group connection to the fishery client is VERY loose. No real requirement to cover all the relevant vessels or to make sure fishers are engaged and know they are in a certification. The Unit of Evaluation allows multiple gears and target species, and includes no restrictions on geographical location. This could potentially lead to very complex UoEs and assessments – for example, at present a single Fisher Group could theoretically contain vessels operating in completely different parts of the world. The introduction to Section S states that the section is based on an evaluation of 'The Fishery', which is "the combination of jurisdiction/management, targeted stock(s) and the totality of all fishers exploiting the stock(s)". As 3.3 is currently written, a single UoE could contain multiple 'Fisheries'. Is the self-assessment private until the point at which the Client proceeds to the full assessment process? | For CC to work, we must be flexible in terms of client definitions.<br>The potential for wider UoEs in different jurisdictions is a good point, we will tie this more closely with the definitions of the 'fishery' in Section S. | Check wording of 3.3. re Section S. |
| | 3.3 | Fishers applying and achieving improvement on a one by one basis is unrealistic. You need to incentivize fisher coordination in the scheme | We disagree, for CC to work successfully, we must be flexible in termsof Fishery Client and Fisher Group size. If one 'early adopter' wishes to join CC, then we will ensure this is possible. | No change |
| | 3.3.2. | Doea the agreement need to be a written agreement? In the standard, you (rightly) recognise verbal agreements and so it would be good to make it clear what is required for the fishery client and fisher groups. | We would keep this flexible for fishery clients and fisher groups. This will be confirmed in the self-assesssment | To be developed in Self-Assessment |
| | 3.3.6. | "It is recognised that many small-scale fisheries target multiple species and so inclusion of these multi-species fisheries is an integral part of Community Catch". Not sure this situation is adequately represented in the Community Catch Standard structure and will suggest 'bubbles' labelled 'Multiple species' and 'Single species' are included to indicate what species the fishery is targeting/type of fishery involved and thus considered as 'Recognised Species' by the CC label. | Agreed, this will be clear in the self-assessment and CAB evaluation | To be developed in Self-Assessment |
| | CGK | "As mentioned CC will allow individual fishers to apply. It's only really possible to do what CC is proposing if the fishers are organized in groups. Individual fishers or many fishers working individually in a `CC fisher group' will not be able to meet the needs as expected by CC. Everything becomes possible when fishers form into groups!" | We disagree, for CC to work successfully, we must be flexible in termsof Fishery Client and Fisher Group size. If one 'early adopter' wishes to join CC, then we will ensure this is possible. | No change |
| | CGK | Individual fishers not relevant- it needs to be a community effort and hence a requirement for a formalized group | As above | No change |
| | 4.2.1. | 'Guidance and assistance will be available'. Suggest there is an outline of the type of guidance and assistance available e.g. online links, additional downloadable documents, notes within the document, or opportunity to speak with certifiers/staff at CAB etc. Guidance/assistance may need further clarification. How will this be accessed if needed? | This will be developed on the CC digital platform | Digital Platform |

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| Self-assessment | 4.2.2. | Rather than or perhaps as well as suggest 'Self-assessment form' is hyper-linked to the document or form. Guidance/assistance may need further clarification. How will this be accessed if needed? | This will be developed on the CC digital platform | Digital Platform |
| | 4.2.3. | 'Provide evidence to support the answers provided in the Self-Assessment'. Suggest additional text states something like 'The type (or examples) of evidence required is outlined in the self-assessment form'.Guidance/assistance may need further clarification. How will this be accessed if needed? | This will be developed on the CC digital platform | Digital Platform |
| | CGK | All photos/pictures added as MOV will need to be date and time stamped to ensure validity | Noted | Self-Assessment |
| | CGK | M.O.V will be very hard to collect- especially for community based clients | | |
| | CGK | Community based clients will need a lot of support- support infrastructure is key | Agreed - to be developed in Digital Platform (a 'living document') | No Change |
| | 5 | •It is not clear how many team members are required for an evaluation, what the required skills / competencies / experiences are to undertake an assessment, or what is needed to demonstrate those skills. | To be developed as part of Certification/Accreditation requirements | No Change |
| | 5.1. | Conformity Assessment Body (CAB). Suggest a Glossary might be useful to provide more detailed explanation of this and other terms used e.g. Fisher Group, Fishery Client, Recognised Species etc. Also publishing the Evaluation Process and Standard in the same handbook with cross-referencing would I think be helpful to increasing clarity/understanding. | Agreed. We will do this. | Glossary to be developed. Cross-referencing to be part of digital platform |
| | 5.1 and 5.2 | Are these CABs similar to those that conduct evaluations against the MSC standard? How much will the costs be compared to the cost to conduct MSC evaluations, which run in tens of thousands to more than US $100,000? Annual surveillance audits also cost money, though we note the option to conduct these remotely. Could alternative review sources, such as monitored peer review or qualified independent consultants, be used to help manage costs?<br>Considering the holistic approach of the standard, what other types of expert would be needed? "Independent Evaluation activities":<br>We are curious to know if you have/will provid(ed) any info on estimated costs for this? | Our aim is afferdability. We hope to construct a system with costs in the thousands, rather than tens of thousands. Testing indicates this to be achievable.<br>The use of CABs provides reliable, professional evaluations with maximum chance of consistency and impartiality. | No change |
| | | We think in the future this will need to be more clearly defined and might find that for the minimum requirements the desk portion will suffice, but for the target requirements there are some definite terms that might need empirical evidence that can only come from speaking with fishers directly. Curious if you're thinking about creating more rigid guidelines for when an onsite assessment is triggered. I think then saying that the fishery client must mutually agree takes away some authority for very egregious issues and risks should there need to be an assessment. For example, if the specific fishery has been implicated for hazardous child labor, but the fishery client refuses onsite assessment, what would happen? "On-site audits may be carried out by mutual agreement of the Fishery Client and CAB if this is seen as the most effective means of demonstrating compliance.":<br>We are curious to know if you see any scenario where you would ever require an on-site audit. For example, if you expand your definition of small-scale to allow for scenarios where there is a larger hired-labor fishing workforce - would that be balanced by requiring an additional on-site labor audit? | Yes, we are developing guidelines on risk categories and corresponding evidence requirements. In some situations a site visit would be necessary and we recognise this (we also recognise the limitations of site visits and are developing tech-based alternatives).<br>If a CAB feels a site visit to be necessary, and the client refuses, then the CAB would make its evaluation accordingly. | Development of risk guidance in progress |
| | | Will high-risk fisheries be required to have at least one on-site audit? | As above | No change |

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| Independent Evaluation Process | 5.2 | Independent Evaluation activities will be carried out remotely, based primarily on information provided in the Self-Assessment; other information may be considered at the discretion of the CAB. On-site audits may be carried out by mutual agreement of the Fishery Client and CAB if this is seen as the most effective means of demonstrating compliance.<br>• The default position here is understood to be that CABs will undertake remote assessments and be based only on information provided by the client. Several important points areise:<br>o The requirement that the independent evaluation is “based primarily on information in the self-assessment; other information may be considered at the discretion of the CAB’ promotes the client information and incentivises minimal or only selective information provision. This doesn’t give adequate confidence that there is ‘independent evaluation’, and is a significant concern given the ASF’s focus on credibility (1), consistency (2) stability (3) and transparency (4). At the very least the evaluation should be “based on information provided in the Self-Assessment and any other information considered necessary by the CAB.”<br>o If a client has an issue known to them but not reported in the self-assessment, it is hard to imagine that client agreeing to a site visit if it has to be ‘mutually agreed’. In this case, even if the CAB wanted a site visit to verify some information, the client can refuse. It is also hard to imagine how a CAB could assess whether “the vessels and their owners are firmly rooted in local communities, traditions and values” in a remote process. In essence, at the initial assessment at least, remote processes should not be an option. We suggest “Audits must be carried out on-site during the initial assessment. Audits may be carried-out on-site in subsequent assessments if this is seen by the CAB as necessary in order to verify compliance” | We need to be clearer in our requirements here. There will be guidance to auditors, but we have also expanded the wording in the document. Essentially:<br>1. The self assessment involves the uploading of evidence to allow verification of the answers provided<br>2. If the CAB feels evidence is lacking, this would be a requiremnet for client action to improve the evidence<br>3. We don't want CABs to have to collect all evidence - this is too expensive; but if the CAB knows an answer, we encourage them to provide this in their evaluation - it would be perverse to prevent this. We have sought to clarify this.<br>4. Does a site-visit guarantee veracity? Evidence suggests not, and is extremely expensive - we are then back into the tens of thousands for an audit and outside the scope of many SSF. We are exploring tech solutions to provide better data, with much less expense. | Updated |
| | 5.3 | The criteria reads "On choosing to proceed to the full Independent Evaluation Process, the Fishery Client will choose an accredited CAB. " I therefore assume, that clients can choose their CAB freely. Drawing from experience with the MSC certification scheme (and other schemes as well), it is highly advisable not to use the same process, where CAB's have a clear conflict of interest (due to the fact that they are being paid and clients expect to get money for value). CABs should be assigned by Community Catch, not chosen freely. Are CABs likely to include those currently used for MSC CofC. There could be a benefit of working with one CAB across both. | This is far too complicated and likely to result in perverse outcomes. We rely instead on the professional integrity of CABs and Accreditation Bodies<br>Yes, we will seek to maximise any synergies and opportunities for cost reduction | No change |
| | 5.5 | If these points are all confirmed, the CAB will Announce the Fishery Client and Fisher Group Evaluation to identified individuals or organisation with an interest in the Fisher Group Evaluation (hereafter called ‘Stakeholders’). The Announcement will contain links to the Self-Assessment.<br>•It is not clear how ‘stakeholder’ will be identified, or what recourse there is if a valid stakeholder is left off the list either accidentally or, more seriously, deliberately.<br>•Associated with this, it is noted that there is only one stakeholder consultation phase. Whilst this may have appeal to applicants, the reality is that a single, early, 30 day period of review of potentially quite limited information provided only through self-assessment, must be expected to be inadequate to give stakeholders a proper opportunity to review outcomes. A second review period, after the CAB has undertaken its verification process, must surely be required to allow stakeholders the opportunity to properly assess compliance? | Identifying stakeholders has always been difficult. We will seek to develop, and continually expand, a global and regional database of interested organisations to aid in trasmitting awareness of evaluations underway.<br>It is perfectly normal auditing process (e.g. ISO standards) for a CAB to conduct an audit and make a decision. The situation in some fishery schemes is abnormal and gives rise to ever-expanding complexity, uncertainty and cost. As stakeholders can see the self-assessment, and comment on this, this gives a much better opportunity to provide effective input than is usual. We consider this entirely appropriate and then look for efficient and cost-effective evaluation procedures. | No change |

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| | | How will stakeholders be identified? Do they have the opportunity to engage in the evaluation process? E.g. if a community or individuals are negatively affected from a fishery operation or if they observe negative impacts of this fishery, how can they provide feedbacks to community catch? | Thisis always difficult. We will provide proposals in our next consultation, and will look to imaginative suggestions as to how to imporve. Again, tech solutions may be available (e.g. social media). | To be developed further |
| | 5.6/5.7 | Does CAB wait until after stakeholder comments to complete report? | Yes | No change |
| | 5.7 | Recommend ensuring the platform for stakeholder comments makes it clear whether their comments will be made public or confidential. And that the system allow for sensitive comments to be kept confidential where needed to protect fishers. | A good point. Our presumption is public, but some issues of confidentiality (especially around labour) can and must be protected. | Section 5.6 has been expanded |
| | 5.8 | Independent evaluation process? CAB assessment report? | Both will be clear at an operational level. | No change |
| | | The Fishery Client will confirm acceptance of the CAB report. The CAB may first revert to the Fishery Client on any questions raised in the Independent Evaluation Process. A period of 60 days will be allowed for the client to respond, otherwise any outstanding issues will be carried into the Improvement Plan<br>•Any outstanding issues? I.e., any issues on which the CAB does not consider there to be sufficient evidence that a requirement is met? | Yes, or issues that require more clarification or confirmation. | No change |
| | 5.10. | The CAB shall assign at least one person to review all information and results related to the evaluation. The review shall be carried out by person(s) who have not been involved in the evaluation process.<br>•It is not clear what the required skills / competencies / experiences are for the person to undertake this review. | | To be developed in Accreditation and Certification document. |
| | | "The review shall be carried out by person(s) who have not been involved in the evaluation process". How are these people selected? Who are they typically? Who are these persons, what are their qualifications, and how are they chosen? How do you assure independence, credibility, and integrity of this process? A bit tricky. An assessment team creates the report and then someone else needs to review the report? Like an internal review process? | This is normal operating practice for a CAB according to ISO 17065. We look to maintain normal operating procedures wherever possible. | No change |
| | 5.10 + 5.11 | It does not need to live in this document, but it will be important for Community Catch to specify what qualifications they expect from the audit team as well as the individuals that conduct the review (5.10) and make the certification decision (5.11). What training and expertise must these individuals and teams have? | This to be developed in Accreditation and Certification document. | Accreditation and Certification document. |
| | 5.11 | How will this certification committee be selected? If it's not part of the CAB nor the client. Are the individuals paid? An again a new different person needs to perform certification decision? | This is a normal CAB function and such Committees are an ISO requirement - to be confirmed in Accreditation and Certification document. | Accreditation and Certification document. |
| | | The CAB shall assign at least one person to make the certification decision based on all information related to the evaluation, its review, and any other relevant information. The certification decision shall be carried out by a person or group of persons [e.g. a committee] that has not been involved in the Evaluation Process.<br>•It is not clear what the required skills / competencies / experiences are for the person / group undertaking the certification decision. | This is a normal CAB function - to be confirmed in Accreditation and Certification document. | Accreditation and Certification document. |
| | | "The certification decision shall be carried out by a person or group of persons [e.g. a committee] that has not been involved in the Evaluation Process". As above how are these people selected? Who are they typically? | This is a normal CAB function - to be confirmed in Accreditation and Certification document. | Accreditation and Certification document. |
| | 5.12 | Regarding market recognition, would outcomes 1 (certified) and 2 (improvement) have similar access to benefits? Will the 5 years certification period be a 'fix 5 years' or will there be the same flexibility as e.g. in MSC, where the certificate can be extended so long that the 5 years is merely a farce? | We hope for similar market recognition, but this is, of course, dependent on purchaser buying policies. | No change |

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| Certification Decision | 6.1 | Why does the CAB award the certification? Doesn't that increase the conflict of interest and hence the risk for fraud?<br>Wouldn't it be more reasonable to have an independent committee as under 5.11 and have them issue the certificate? | No, this is a normal and well established CAB function. The independent committee would be established by the CAB | No change |
| | 6.2 | The self-assessment and evaluation reports may contain sensitive information, in particular with regards to social and labor issues. Recommend you explicitly consider whether there are any details that should remain confidential, for example for the safety of fishers. | This is a good point, and something we have considered. We see transpaency as highly desirable, but will recognise cases where the CAB and client may agree not to disclose certain sensitive information. | See Section 5.6 |
| | 7 | Improvement Plan and Timelines – it might be useful to have visuals/infographic to illustrate typical timelines, with and without Improvement Plans. What checks will be made to ensure Improvement Plans are credible, and who will make these checks? For example, who checks whether the Plan meets 7.5? Does the Plan need to meet the other requirements typically expected of FIPs – e.g. each task has a specified end date, each task has a defined person or organisation responsible for delivery, etc? | Infographic idea is a good one, we will follow up on this.<br>We have developed the text here, and the Client Action Plan proforma to address the important issues raised. | Sections 7.2-7.5 expanded |
| | 7.1. | "If the Fisher Group meets all scope and Minimum Requirements, but not all Target Requirements of the standard, the Fishery Group is recognised as 'Improving within the Community Catch Programme'". How will consumers be able to distinguish between products produced by Certified Groups and those that are Improving? Or will it be the case that only certified products are labelled/display the CC logo? This implies that the Fishery Group becomes recognised as Improving as soon as the Evaluation process is completed. How long does the Fishery Group have to produce an Improvement Plan before this recognition is suspended? | This is to be developed by marketing section, but both certified and imporving fisheries will have recognition within the CC Initiative<br>Time to produce plan not specified, but if longer than 12 months, a surveillance audit is required to evaluate any changes in the fishery. We recognise the difficulties for SSF in producing extensive action plans. | To be developed further |
| | | Accordingly, the maximum timescale to complete an Improvement Plan would normally be 15 years.<br>• The text of this section can be read as implying that fisheries would normally have 15 years to complete an improvement plan. Certainly, there is not a clear steer here to CABs to set timescales for improvements that are appropriate; if 15 years are available, CABs may be tempted to allow the full 15 years, irrespective of the demands.<br>• We note the footnote that states: "8 An additional 5-year extension may be allowed (to the determined 5, 10 or 15 year timescale) if the Fishery Client has made good faith efforts to complete the Improvement Plan, substantial improvements have already been made, and the Fishery Client can reasonably claim that remaining issues can be completed within a further 5 years." The offer of an additional 5 years, irrespective of the length of time that may reasonably be expected to be needed to complete a part of an improvement plan, and even beyond a 15 year initial period, seems generous and provides little incentive to make significant progress early in the improvement period. The granting of additional time may be justified in exceptional circumstances, but such additional time should be aligned to the complexity of the task. | Yes, we will align time allowed to the complexity of the tasks.<br>15 years seems a long time, but consider no such time limit for FIPs (which have market access) and MSC fisheries, which could be very well resourced, can have 5 years in ITM and then 5 (or 10) years with conditions. For SSF, often with limited resources, we consider these timescales appropriate.<br>The rules governing time limits will be presented in the next draft of the Evaluation Process | Updated in doc |
| | | Accordingly, the maximum timescale to complete an Improvement Plan would normally be 15 years.<br>Too long, should not exceed 10 years. | See above | |

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| Improvement Plan and Timescales | 7.3 | For Fisher Groups with few (<XX) non-conformances and where these are entirely within the control of the fishery client/fisher group, improvements would normally be expected to be completed within 5 years. For Fisher Groups with many (>XX) non-conformances, or issues that are beyond the control of small-scale fishers and require the intervention of external parties, improvements would normally be expected to be completed within 15 years.<br>•What happens if progress is not made annually – is there a consequence?<br>•What does 'normally' mean in this context? | Yes, suspension. This is in Section 11, but we will also make clear in Section 9. | Changes made in section 9 |
| | | 15 years is a REALLY long time to be in an improvers programme. This should be tightened up to create gradual steps to show change, but 15 years is way too long for overall progress to get to certification unless there is an outstanding need that should be demonstrated (like slow growing species) As the document points out, some big systemic changes might be required, including political will, which may be beyond the project's control (especially if this is a small portion of the fishery). What's the expectation when, even after more than 10 years, there are no significant changes (e.g., Ecuadorian Mahi FIP has been active for more than 10 years)? How are enough budget needs to be considered here? Important decision about how many non-conformities shall be considered few or many. "Accordingly, the maximum timescale to complete an Improvement Plan would normally be 15 years.":<br>We appreciate your approach for having a different timeline depending on whether it is fully within their control or outside of their control. | See above | No change |
| | 7.2 | Will Improvement Plans be publicly available alongside the self-assessment and evaluation reports? | Yes, all will be made public | No change |
| | 7.4 | Progress against the Improvement Plan shall be considered by the CAB at annual surveillance audits within each 5-year period. CABs shall report where progress has, or has not, been made.<br>•There appears to be no guidance on the format of these annual audits. We presume the CC default is expected to be remote, but believe that onsite audits should be undertaken at the discretion of the CAB based on their perception of need? | Set out in Section 9 | See section 9 |
| | 7.6 | Insufficient progress will lead to suspension as set out in Section 11<br>•It is not clear if the first instance of insufficient progress will result in suspension, or some subsequent instance, and whether it is a single issue or several issues with insufficient progress that is the critical determinant. | We will expand this in Section 9 and 11 | Text removed from Section 7 |
| | 7.7 | Supporting FIP-like structured improvement process should be prioritised | Agreed | No change |
| Changes to the Fisher Group | 8 | Being able to change ANY aspect of the fisher group at ANY time doesn't seem right. Change in gear type or target species or a major percentage of the vessels must trigger a re-assessment or what's the point of the assessment at all? This might have varying degrees of re-assessment, but leaving it wide open is not appropriate. | Agreed. This section has been modified. | Section 8 modified. |
| | 8.1 | Being able to change the scope of the Fisher Group at any time is potentially very confusing for the supply chain, especially if it happens frequently and/or involves changing the target species. It is also open to abuse: for example, is there anything to stop a Fishery Client from asking Fisher Group members for financial contributions to fund the Evaluation Process, then immediately kicking them out of the Fisher Group to establish a monopoly on CC certified material? | As above. The latter situation seems unlikely, but there is nothing to stop such people having their own separate registration and drawing heavily on the existing one - in which case everyone loses. | See above |

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| | 8.3 | When changes in the scope occur, and the CAB needs to verify, is it correct to assume that there will be costs associated to this? May be worth mentioning here that this will incur additional costs, which will (presumably) be borne by the applicant. | As above. Yes, there will be additional costs, but we will look to minimise these. | See above |
| | 9.1 and 9.2 | Based on the mention that the program offers credibility, should not be more frequent audits to the certified fisheries (annual as the ones in an improvement phase)? | We want to minimise costs and reward effort in completing Action Plans. We will consider this, but keep as is for time being. | No change |
| | 9.1 | Normally, Fishery Clients and Fisher Groups which are Certified shall undertake surveillance audits once only, between the second and third anniversary of publication of the Evaluation Report.<br>•What does 'normally' mean, here? In what context, or on the basis of what criteria, can the CAB deviate from this? | Normally' removed for clarity. | Text change |
| | 9.2 | Fishery Clients and Fisher Groups which are Improving within the Community Catch Initiative shall record actions taken in achieving the Improvement Plan on an annual basis. Fishery Client and Fisher Groups which are Improving within the Community Catch Initiative shall undertake surveillance audits on an annual basis.<br>•Second sentence – Fishery clients<br>•Is this a contradiction, or is the first sentence unnecessary? I.e., if FCs & FGs are undertaking annual audits, do they also need to record actions. If both recording actions and undertaking audits are required, where are the FCs & FGs recording their actions, and to whom are they reported? | This section has been reworded for cl;arity, but the intent is unchanged. | Reworded |
| | 9.3 | Surveillance activities will be carried out remotely. On-site audits may be carried out by mutual agreement of the Fishery Client and CAB if this is seen as the most effective means of demonstrating compliance.<br>•Similar to the comment on 5.2, it is apparent that even if the CAB wanted a site visit to verify some information, the client can refuse. This should not be an option. We suggest "Surveillance activities may be carried out remotely. On-site audits may be carried out by the CAB if this is seen as the most effective means of demonstrating compliance" | The intent is that deliberate refusal leads to suspension. We have reworded this to shift the emphasis. | Reworded |
| | 9.4 | Could you provide examples of what "good faith" efforts mean? | This is a quasi-legal term - to be fair, open and honest. We have added this to the glossary. | Added to Glossary |
| | 9.4. a,b | "no changes have occurred in the operation or environmental sustainability of the Fisher Group". Suggest adding 'social or' after 'or' in both cases. | Reworded | Reworded |
| | 9.4c | For Fisher Groups 'Improving within the Community Catch Programme', that actions taken in meeting the Improvement Plan are being completed on schedule. Delays may occur due to factors outside of the control of the Fishery Client and Fisher Group; these shall be accommodated as long as the Fishery Client makes good faith efforts to achieve the outcomes set out in the Improvement Plan.<br>•Here, is it the CAB's responsibility to determine that 'good faith efforts have been made?<br>•How are 'good faith efforts' defined?<br>•What happens if a CAB determines that good faith efforts have not been made? | Good faith further defined. Lack of action would lead to suspension. | Text modified |

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| | 9.4c & 11.2b | CABs are likely to need additional guidance as to what constitutes a “good faith effort” to achieve Improvement Plan outcomes. In my experience with FIPs, delays are inevitable and there is a challenging balance to be struck to enable encouraging and rewarding improvement without enabling FIPs which make the minimum effort. A straightforward example of a challenging decision for the CAB would be: what if a FIP has made excellent progress on one task, but shows no evidence of progress or effort on another? | This is very helpful, and has been incorporated in the definition. | Text modified. |
| | 9.6 | All Surveillance Audits shall take place at a suitable time at the mutual agreement of the Fishery Client and CAB, where practicable this should be before the anniversary of publication of the Evaluation Report.<br>•What if it is not practicable to undertake the audit before the anniversary – how long after the anniversary may be permitted? | Timings made clearer. Non compliance would lead to suspension | Text modified |
| Re-Evaluation | 10.4 | While we completely agree with this approach and intent (for 10.4 - 10.6), it will be important for Community Catch to have oversight of CABs that ensures consistent application of how "good faith efforts" are audited across CABs and clients/groups. | We have clarified requirements here. | Text modified |
| Suspension and Withdrawal | 11 | The CAB can take actions but there is no mechanism for Community Catch to check the work of the CAB and suspend or withdraw a fishery that is no improving or complying. This reduces the credibility of the scheme and will create an incentive for CABs to cover up any problems or issues. | This is very much a CAB function. CC must, and should, be independent of this decision-making process. | No change |
| | 11.2 | Will there be any mechanism in place to enable the suspension and/or early surveillance of a fishery if evidences arises that they no longer meet the requirements of the Standard? | This would have to be at the discretion of the CAB as per ISO17065 | No change |
| | | Fisher Groups shall be suspended by the CAB if one or more of the following is determined to apply, either at a Surveillance Audit or Re-Evaluation:<br>b) It has not achieved, or made good faith efforts to achieve, actions specified in the Improvement Plan<br>•Query as to the criteria by which the CAB may assess efforts to have been made or not made in ‘good faith’. | As above | No further change |
| | 11.2.b | May consider adding a timeline for showing progress toward improvement plan – e.g., if no good faith efforts visible within 2 years, suspension applies. | We will keep this in mind. This is the intent if good faith efforts have been/are being made. | No change at present |
| | 11.3 | We are curious to know if they will have to provide a reason for the suspension? Will the reason made public on the site? | Yes, this has been added. | Text modified |