Standard: Consultation Responses and Proposed Amendments

Section	PI	Comment	Proposed Response	Amended Text
General	ALL	Document needs page numbers	Agreed	
		General comment – the running order of the sections in the standard are not alphabetical – is there a reason/logic for this?	We have tried not to prioritise the different aspects of the standard. However, it has proven that clarity and consistency requires a more systematic numbering system. This will be instigated for the next version.	Sections to be numbered, with numbering consistent between Standard, Self-Assessment and CAB audit reports
		GENERAL THOUGHT/FEEDBACK: Overall, HRSRP and CC standards feel like they line up nicely. Implementing the HRSRP can serve as a foundation to help move towards CC certification. E.g., the Policy Statement provides a core set of themes the group is committed to-- a policy statement could be expanded to include other themes from CC standard as well. The Vessel/Fisher list is a way of defining the scope of the CC certificate. Activities to build fisher awareness of rights can help meet CC requirements that relate to fisher understanding of work rights (e.g., under Work Agreements) and understanding of GM and other conflict resolution mechanisms. A CC self-assessment that has been verified by a CAB can serve as them meeting Component 2.1, and in developing a workplan to improve against the CC standards they meet 2.2.	We are constantly looking at equivalence of standards. This will be reported separately.	Reported separately
	L & H	Many of the Target Requirements will be difficult to assess without a site visit. Telephone surveys has been suggested above as a potential solution, but this is only applicable to some clauses and even then will be challenging to design in a reliable way. H3 – H5 can't realistically be assessed (beyond self-reporting) without, at minimum, a remote video assessment. If self-reporting is the main source of information for these clauses then there is a risk to credibility – and also an increased risk that certified fisher groups may contain breaches of these requirements.	Determining the experiences of fishers on (potentially) a large number of small vessels, and in a cost-efefctive manner, is hugely challenging. Site visits (and even video cameras) are very expensive (relatively) and also have problems of veracity and bias; observers are hugely expensive and (apart from single day trips) logistically difficult. It is very much our intention that all claims made in the self-assessment should be supported by verifiable information. Mobile-phone based surveys are being tested as part of our trial evaluations but, as noted, may not cover all clauses. Videos, remote video assessments, testimonies by local NGO's or unions, interviews with regulators/inspectors are all being considered as means of verification. Our intent is develop a 'risk-filter' whereby remote and cost-effective information can be provided to CABs proportionate to the risk posed in the fishery. Where risks are high, site visits etc may be required, and have not been ruled out as an auditing solution.	Further General guidance to be provided on appropriate sources of information, incuding site visits.
	G&S	One of these sections should contain a more explicit requirement for a harvest strategy. The current focus is on objectives, but more focus should be placed on the strategy that is supposed to attain those objectives.	We have deliberately steered away from requiring formalised, documented, processes such as Harvest Strategies and Harvest Control Rules (see Footnote 39). Rather, we are looking for essential characteristics (within the constraints of the GSSI benchmark) that can be met in traditionally managed and data-poor fisheries.	No change
		What does it mean for the minimum requirement, if the field is 'empty'? Does it mean that the minimum requirement is the same as the 'target requirement' or is there no minimum requirement at all? This should be specified at the very beginning of the Standard.	Not all clauses have a minimum requirement. We will make this clear in the next version of the document.	Further clarity in the standard on minimum requirements.
		Many of the definitions throughout the standard are vague and open to interpretation. Combined with a reliance on self-assessment and possible weak checks by CABs, many sections might be rendered meaningless. Very significant for sections L and H.	We are continuing to expand guidance and definitions as we develop, and especially based on learnings from our trial fisheries. This will be expanded in our next version and will continue to be developed in our digital platform as a 'living document'.	Guidance throughout.
		There is a notable lack of explanatory material and definitions within the Standard and Process that we think will result in a critical lack of consistency in application, between fisheries and between CABs.	As above	As above

	ASF	Stakeholder involvement is limited to comments on information as presented in the initial, self-assessment stage, only – there is no further opportunity for stakeholder comment, and no independent external review stage once the CAB has added any information and presented its determination. In a competitive market, this has the potential to result in a CAB race to the bottom (and accusations of a conflict of interest for the CAB's own review processes).	If we are to get to an affordable situation for SSF, then auditing needs to follow a more traditional 'ISO-like' process. This is perfectly normal in the certification industry - it is fishery certification in which these additional stages have developed, leading to an anomalous situation inaccessible and unaffordable for many SSF.	No change
		The multi-species approach lacks adequate definitions and protections for vulnerable species within a potential managed (or target?) stock group.	Addresed below.	No change
		The labour requirements of the Standard seem reasonable, as do the H&S requirements, but we do not believe they can be verified adequately when, a) there is no information presented on requirements for auditor qualifications/skills/experience, and b) the default requirement is for a remote assessment process, only, that relies mainly on information provided by the client with on-site audits only occurring by 'mutual consent'. In this regard, a mobile telephone-based labour survey of crew provides no assurance.	We are developing these verification and evidence requirements in general guidance. We appreciate comment that these sections seem reasonable - this is our aim.	General guidance
		There is potential to score a number of the environmental PIs with a risk assessment, but there is currently no information presented on how that will be undertaken, or what low, medium or high risk means. Non-threatened, out-of-scope species comprising less than 5% of the catch fall through the Standard. This could result in many fisheries being certified with still quite significant interactions with IUCN NT, LC and DD seabirds, dolphins, whales, and even some turtle populations.	General guidance will be provided on Risk Assessments. It is difficult to deal with possible 'quite significant' interactions - our intent is therefore to deal with definite issues which may threaten sustainability.	General guidance
		The FNA requirement for shark products is consistent with stakeholder interest in this issue, but there is no verification requirement.	Addressed below and in general evidence guidance	General guidance
		Some passing requirements don't set performance requirements for the fishery – they simply require that information is presented on what the fishery is doing on an issue.	This is intentional. These are addressed individually below.	No change
		In summary, ASF is concerned that there seem to be many opportunities for fisheries to be inappropriately or inconsistently assessed, or even for assessors to be deliberately misled, and few opportunities for such issues to be identified and corrected.	This is a wide-ranging comment. We trust that general guidance on evidence, verification and auditing requirements will asuage these concerns.	General guidance
	G	How does assessor determine whether system is participatory if that particular fishery client/self-reporter does not participate? In general, based on the pilot I assessed, this section will need consultant help or the assessors will be required to investigate the management system themselves.	There will be some requirement to collect this type of information - it may be known to the fishery client, it may be obtainable from the fishery managers (e.g. records of previous invittaions to participate, consultations etc). We will continue to develop and update examples of suitable evidence. We do not propose that the assessors carry out investigations themselves.	To add examples of suitable verificable evidence
		Terminology related to management systems is a little confusing throughout- be sure to define and clearly differentiate between concepts of fisheries management and Fisher Group management (which would be more like an internal management system or internal control system).	Any type of management system may be appropriate, as long as it delivers effective management of the fisher group on the water.This is discussed further below.	No change
		Trial Fishery Question: Footnote 9 to clause G8 (Monitoring, Control and Surveillance) mentions employment, H&S and environmental protection. Does CC want to do this, or limit management system discussions to the management of the fishery only.	FAO use a definition of fishery management as: 'The integrated process of information gathering, analysis, planning, consultation, decision-making, allocation of resources and formulation and implementation, with enforcement as necessary, of regulations or rules which govern fisheries activities in order to ensure the continued productivity of the resources and the accomplishment of other fisheries objectives'. Propose limit Section G to fishery management only (including footnote 9) and allow wider potential scope of responses to issues of employment, H&S etc. - i.e. not tied to a 'fishery management system' as used here.	Amended Footnote 9
		Suggest changing terminology to "…relevant customary and/or local practices, and national and international laws and regulations…"	This would mean a requirement to have both customary/local AND national/international, while there may be only one, or some combination of these. Prefer to maintain as is with guidance clarifying this.	No change

	G1	International law compliance as a requirement opens this up to "economic colonialism" through policy. For example, CC forcing a small-scale fishery in Indonesia that only chooses to sell to Japan to be subject to US FDA laws. Place based policy would make the small-scale fishery subject to national laws but not necessarily global standards.	This would be compliance with international law only if this were relevant to the jurisdiction responsible for managing the fishery (e.g. and RFMO). Clause G1 modified and clarified in guidance.	The fisheries management system operates in accordance with relevant and effective [1] customary, local, national and international laws and regulations as applicable to the Fisher Group. Where the stock(s) fished by the Fisher Group are transboundary fish stock(s), straddling fish stock(s), highly migratory fish stock(s) or high seas fish stock(s), there shall be a bilateral, subregional or regional fisheries organization or arrangement, as appropriate, that is concerned with the management of the whole stock unit over its entire area of distribution. The Flag State(s) of the Fisher Group shall be members or participants in the relevant organisation or arrangement. Guidance: 1. [1]Guidance: the effectiveness of the management system will be demonstrated by performance against Clause G8 and more generally performance against the CC Standard (including, but not limited to, Clauses relating to Recognised Species and Biodiversity) 2. Guidance on nature of management system - can be only local or some combination. Also that international laws would be those with jurisdiction relevant to the fishery such as an RFMO.
		Response to GSSI requirements identified in PA	Shown in clause G1 above	See above
	G2	Social and economic aspects must be considered in order for the precautionary approach to be balanced in the review of management measures. Using the precautionary approach due to the lack of scientific information without considering the economies and livelihoods of fishers can have negative impacts and lead to a lack of compliance.	This is noted. The timescales allowed for 'corrective actions' would allow the client to prioritise resources between environmental and social issues.	Precautionary approach take socio-economics into account - guidance
		Not only must the decisions and their rationale be communicated, but it must also be ensured that the actors understand them. For this, the capabilities of artisanal fishermen must be improved so that they understand fisheries management	It is the intent of CC that resources, contacts and information would be signposted to fishery clients to allow them to deal with issues arising from the evaluation. Templates for client action planning will also be made available.	No change
		Clear definition of small-scale fishers/Formal gender segregated data system of SSF being integrated to DOF data based system/ documentation on existing customary rights, practice and local wisdom of SSF communities conducted/	A practicable working definition of small-scale fisheries is being developed. Determination of rights etc is included in Section D	No change
		Fishery management organisation: The fishery management organisation or arrangement keeps management measures under continuing review3 •For 'measures' here, is it all measures, some measures or critical measures, etc? What criteria might be used to determine that a measure has been or has not been under continuing review?	There are a number of issues which may lead to further and further definition requirements - such as 'what measures are critical?'. We have proposed guidance here to elucidate our requirements.	Guidance: The intent here is that the fishery management organisation should maintain sufficient level of oversight to determine whether or not measures are achieving their intended goals. If not, the the organisation should modify or remove the measure(s). Suitable evidence may be documentation of a review process and its outcomes, evidence of measures which have changed in the light of experience, evidence of measures which are clearly failing, based on clear evidence, but have obviously not been reviewed. It is the demonstration of change following review, rather than purely documentation, that is sought - reflecting the situation in traditional/community management arrangements.
		(This question applies to all the PIs). To be considered covered, do ALL the statements need to be in place? For G2, the fishery must continue reviewing AND using the best science and traditional knowledge within justifiable timescales. In relation to communicating decisions, the language should include something related to "accessible ways or channels" that guarantee that these communications reach the audience. For example, several management organizations made information public but "is buried" in websites or locations that fishery participants (especially fishers) are not familiar with or never visit.	Yes, all statements need to be in place, this is much clearer in the audit report template that is used in an evaluation. This will be provided at future consultations. Re communications, Clause G2 states 'communicated to relevant stakeholders so as to enable effective management.' This captures the same intent as the reviewer comments. We can add guidance to make this clearer.	Guidance: communicated to relevant stakeholders means providing information in a manner which is appropriate to enable effective communication to the intended recipients.
		The mechanisms for conflict resolution systems must also be "transparen	The suggestion is noted, but transparency need not be essential to be impartial and effective.	No change at present, but subject to ongoing monitoring.
		There are some existing requirements for what an effective resolution is, I would suggest this be provided in the guidelines for the assessors/reviewers. What the actual mechanism is can and should be flexible as identified in the standard.	We will explore this in guidance.	Further information available in guidance
		GIS Data base on existing conflicts in the marine and resource used among different fisher groups and others private sectors	We will seek to collect good examples to provide to future participants.	Reseach and examples to be provided. No change immediately

Governance	G3	Conflict resolution. Effective systems for conflict resolution are provided through impartial and effective mechanisms5. •In particular, within community-based management systems, 'impartiality' seems likely to be very challenging to demonstrate. How will it be determined? •This is something that is likely to be especially challenging to determine remotely, using only data provided by the client.	We propose guidance to clarify this.	Guidance: conflict resolution in Self-Assessment
		See comment at L8 about GM and remedy/corrective action. The language here is vague enough that it might incorporate that concept better than in L8.	This section is about mechanisms in the management organisation, L8 is about mechanisms onboard vessels. We need to keep these separate to avoid confusion.	No change
	G4	The fishery client must report the subsidies, and the government authorities must also do so.	We try to avoid raising requiremnets (as far as we can) that are outside the control of the fishery client - so where we can, we ask for information that a fishery client can obtain, rather than (governmental) inputs which may not be forthcoming.	No change Guidance on reporting reqs and identify (orange) establishing baseline questions in SA to identify nature of subsidies Report subsidies in FG, details on impact on fishery
		Data on financial allocation analysis and beneficially group	Again, we avoid (as far as possible) requirements and analysis that are not essential - in line with our aims of increasing accessibility and affordability.	No change
		Subsidies: The Fishery Client shall report any subsidies6 within the Fisher Group •There don't appear to be any implications for subsidies being present, including for those that may lead to overcapacity (footnote 6)? But, if not, what is the point of reporting them? If it is simply to inform potential buyers of the situation then instead of an assessment PI it could simply be a statement made up front as part of a scope declaration?	There are a number of clauses across the standard, like this, which aim at transparency of information, rather than specific outcomes. As part of the standard, we are better able to monitor any changes in the situation.	No change
		How would this information be used? Sometimes subsidies exist, but they are not used in the best way possible and do not lead to overcapacity.	Various subsidies (e.g. fuel tax) are common, some are positive, some lead to overcapacity. Again, we look to establish baselines and monitor trends - often outside the control of a fishery client.	No change
	G5	The governance system must also be ¨effective¨.	This has been added to clause G1	See G1
		Conflict analysis related to governance in the fishery and marine coastal resource management.	This is captured in G3	No change
		Documentation may not always be available.	Guidance proposed.	Guidance: It is recognised that in some traditional or co-managed situation, not all aspects of the fishery management system will be fully documented. This is acceptable within the Community Catch initiative as long as evidence is available to support management effectiveness, including, but not limited to, achieving objectives for Recognised Species.
		Participatory management: The Fishery Client and/or Fisher Group commits to participate in the fishery management system and to make data available to the fishery management organisation as required and to the extent that is possible. •How is 'to the extent possible' going to be assessed? Simply 'as required' is more auditable / verifiable.	This is the minimum requirement and data may be requested but not be available (for various reasons) within the fisher group. Full provision of required information is covered in Clause G9	No change
		Are you differentiating between different levels of participation? For example, are they just consulted about decisions or are they empowered to influence/change make decisions?	The ability to influence change and make decisions is variable, and obviously outside the control of a fishery client. We are looking here for a system which seeks input and information	Guidance provided
	G6	Segregated data analysis of different sectors in the management mechanism.	This does not seem a reasonable request of a fishery client.	No change
	G7	Gender analysis/and SSF participation in the Fisher management mechanism formally appointed by DOF and related organizations	This does not seem a reasonable request of a fishery client.	No change
		g8 could use language from MSC principle 3 about the existence of enforcement authority assigned to an agency in legislation and evidence that the agency has used that authority. Enforcement should have clear evidence publicly available, not just in reports from the fisher group. This should include regularity of patrols and inspections as well as assets used for the fishery. This will give credibility if appropriate for the range and type of fishery.	This is a hard thing to mandate as enforcement may be highly variable, especially in traditionally managed fisheries. We will include guidance to assist in this interpretation.	Add guidance on enforcement evidence requirements results of rest of evaluation show effectiveness? evidence from efefctiveness in past operation if not met, prioritise in action plan for yr 5 to effective planning for resolution
		Identify and analysis measures developed		N/A

	G8	The management system provides effective and suitable monitoring, surveillance, control and enforcement of regulations9 applicable to the Fisher Group10. •What is 'effective and suitable' in this context? •At what point may a system be deemed to be ineffective or not suitable?	This requires guidance as outlined above.	Add guidance. incl definition of MCS - restricted to fishery management
		The management system should also provide these things with regards to Community Catch certification requirements. Generally, it feels that some basic requirements related to having an internal management system appropriate to the size and scope of the Fisher Group is missing from the Standard-- such a system is necessary to ensure ongoing compliance with and improvement against the Standard and accurate self-assessments.		Not want to mandate this - not necessary in all cases. General guidance developed on development of fisher association to represent group where considered necessary and appropriate
	G9	As well as information requested by Community Catch and the CAB with regards to gaining and maintaining certification.	Not needed	N/A
		Assessment report on resulted from an implementation od laws /rule and regulation developed to addressed occurred problem such as IUU	Relates to management measures G2 - relates to measures affecting fishery operation	See G2
		Compliance: The Fishery Client and/or Fisher Group supports the monitoring, control, and surveillance and enforcement systems and provides, as far as possible, compliance and monitoring information requested by the relevant authorities11. •Similar to a previous comment, how is 'as far as possible' going to be assessed? Again, 'as required' (in this case replacing 'requested') would be more auditable / verifiable.	Data deficiency often a problem	This is a target requirmenet, not a minimum requirements and so comment is apposite. 'As far as possible' is to be changed to 'as far as is practicable' with guidance on why everything rerequired may not be achievable in a small-scale situation.
		Verifying if this is applicable when we think about terms and agreements between fishers and their buyers? Then also might be good to include something about seeing products being weighed and graded as part of pay transparency if they are being paid via p	Not appropriate here - dealt with in Labour	N/A
	G2 / G5 / G9	Review of management measures / participatory management / compliance areas could be opportunities to alleviate concerns about my comments on section G1 to include incentives for global market policy compliance as means to go beyond compliance with national laws	Not appropriate	N/A
	G8 and G9	How is "Effective and suitable" evaluated? This seems to be a very subjective evaluation. How can a "lack of bad record" be considered a good management performance? This may be related to a lack of effective enforcement actions that generate that "good record."	good record is the requirement demonstration of effectiveness for S and B	General guidance on this to be added.
		Monitoring, Control, Surveillance (MCS), compliance. In relation to monitoring of vessels, what use, if any, will be made of block chain technology, include collaboration with various initiatives, for example, OceanMind , and the Global Dialogue on Seafood Traceability (GDST) , which have been established with the aim of increasing transparency, traceability and fisheries management enforcement within the global seafood supply chain.	Another source of information that can be used in audit evidence. Can be kept under review	No Change
	G6-9	There is no minimum requirement for the indicators. Many of the targets should actually be the minimums.	nThis level of monitoring and management is considered inappropriate for most small-scale fisheries	No change
	D	Client is only asked to report on rights, opportunities, benefits and access to financial services, and not to report on structural barriers to achieving these. This information would be important for informing continuous improvement of these issues. Also terminology – capitalize "Indigenous people".	The suggestion to include reporting on structural barriers is accepted and will be incorporated into the next version of the standard	Included in standard and guidance.
	D1	This requirement could also include those fishers who are processing fishing rights and who can present evidence about the process.	Not necessary in terms of the fisher group	N/A
		Recommend defining what fishing rights mean (access rights for what? social, cultural, food security, economic benefits, etc.).		Definition added to guidance
		Recognition of SSF Customary rights need to be recognized by including in the DOF tada system to be used and monitored for fishery management.		No change

Community Development		Change wording from “The Fishery Client shall report on fishing rights held by the Fisher Group and any legal or other protection of such rights.” TO “The Fishery Client shall report on fishing rights held or claimed by the Fisher Group and any legal or other protection or contestation of such rights.”		To be included in self-assessment
	D2	It is challenging for exporters to provide information on opportunities and distribution of benefits derived from trade because this information could affect their interests.		Trade only in community/FG - to be included in Self Assessment DDM
		There is no minimum standard and no prescriptive outcome for making sure that women and families are not negatively impacted by the certification or any management decisions		It is difficult to legislate for all societal effects. No change, but this will be monitored and explored in future revisions.
		SSF groups is organised and collectively agreed on the group objectives/target indicator to be achieved and activities implementation planned developed with clear role and responsibility on the project management system.	This is more relevant in the process document, where scope is defined.	N/A
		If exporters provide benefit information, this information must detail the benefits for all actors in the supply chain, not just organizations and communities. It would be interesting to clarify how the benefits are distributed throughout the supply chain.	We are striving for a transparent system, however we will not be requiring the entire supply chain to report their benefit. This section focuses on the reporting of benefits within the community.	NO change
	D3	Se debería especificar que los servicios financieros no estén atados a compromisos de compra que influya en un precio injusto al pescador. **Google translate:** It should be specified that financial services are not tied to purchase commitments that influence an unfair price for the fisherman.	Wording needs clarification, either to specify that we are speaking about 'official financial services" or banks.	Guidance added that financial services
		Capacity building on financial management of the group.	It is beyond the scope of the standard, however we are keen to offer links and resources on our digital platform, including some aspects on financial management.	No change
		How will this be evaluated? This is a really important community development aspect with a lot of nuance ... How will it be determined where this is necessary? Recommend building out further guidance for this requirement to ensure it is clear and consistently implemented and audited.	It is our intention that this is a reporting section of the standard. The fishery client, in collaboration with the fisher group, will report on this and be required to report on this regularly. Over time it is our intention to build out incresaingly expansive guidance to both the CAB and the fishery client, inlcuding templates or suggested report formats and advise on what to report and how to appropriately collect the information required to report effectively on this section.	No change
	D4	It should be specified that financial services are not tied to purchase commitments that influence an unfair price for the fisherman.	See above	No change
	D1-3	•The passing requirements here are only that fishing rights and legal protections, opportunities and benefits from trade in fishery products, and the availability of financial services are reported on, but there is no standard set, here, for those rights, legal protections, opportunities, etc. •It is unclear what benefit may accrue to communities, including to women, vulnerable and marginalised groups and indigenous people without a performance standard being set and, therefore, without there being a consequence for not having appropriate rights, legal protections, opportunities, etc. in place. As they stand, these requirements feel much more like minimum than target requirements.	Thank you for the comment. As with other sections of our standard, we have decided to make this a reporting only section. You'll see that Climate Change and Animal Welfare are similar. It is our intention that the fishery gains awareness through these reporting sections, that it begins to understand that their progress is available publically on their profile and that by understanmding that their potential market is watching their progress on these sections, that there is an inbuilt motivation top progress on these sections appropriately. AS noted in F71 above, we will be adding guidance for the fishery client over time on how to progress in this section appropriately.	No change
		Where SEDEX is specified by UK retailers, will it be recognised as equivalent?	An equivalency process will be conducted with relevant standards (probably not including SEDEX, but including MSC, FISH Crew, FairTrade, RFM etc).	No change

L	Between target and minimum requirements in this section, we're getting confused – we don't understand the difference between the minimum and target. For example, for the minimum to be met, the target would in theory have to be met. If that's the goal, that's great, but should be more clear. ***We can hop on a call to discuss this.	This is intentional. We have required the client to confirm, for the minimum requirements, the absence of the various forms of labour abuse (child, bonded, forced etc) and also to confirm the presence of various approaches/systems which ensure good labour practices exist. For meeting the target requirments we require that the client is much more capable to show and evidence that each of these topics is being dealt with in a comprehensive way and that safety nets exist for fishers, crew and workers.	No change
L1	It could be included as a requirement that fishers be organized into an organization that represents them all.	Guidance to be provided to address cases where this is an appropriate and practicable way forward.	Guidance required
	See comment in L2. Throughout this section there are reference to reporting, but it is not clear what is meant by that. Recommend clarifying.	Guidance required	Guidance on what reporting is - NGO, fisher report, inspection - information of record
	Avoid use of word "confirms" or at least clarify what the minimum expectation here is. Also important to define this requirement based on the ILO 11 *indicators* of forced labor. Each indicator of forced labor can be defined in the footnotes. This is much more cogent and aligned with the ILO approach rather than simply "confirming there is no indication of forced labor."	Guidance to be provided on the 11 indicators of forced labour: • Abuse of vulnerability • Deception • Restriction of movement • Isolation • Physical and sexual violence • Intimidation and threats • Retention of identity documents • Withholding of wages • Debt bondage • Abusive working and living conditions • Excessive overtime	Guidance on these and note that many covered in the standard
Footnote 14	Consider adding example of a role on a vessel that isn't actively fishing to make it clear that anyone working on board (even if they are just the cook, or just cleaning the deck, or whatever else) is still considered a "fisher".	Update footnote 14, to include the example of 'other' workers that may be present on a vessel, other than fishers	Definition of 'fisher' to include all members of crew - including cooks etc
L2	Reported to who? CC? The authorities?	Changed to 'resolved' to reflect intent.	Text amended
	How is debt bondage considered here? In this type of bondage, producers are tied to middlemen through debts that are (sometimes) unpayable.	This sentence in the TR refers to debt bondage (Access to services or facilities is provided on a reasonable and fair basis and does not contribute to significant indebtedness), as do footnotes 15 and 16. The wording on this will be updated to clarify that this refers to fishers.	Access 'by fishers' to services or facilities is provided Links/indebtedness between fisher and middlemen - footnote 16 (see what is SRA most useful?) & fisher survey?
	Build out some specifics about what "services" is referring to and maybe be more direct when it comes to what debt bondage can look like between a buyer and fisher.	As above	As above
L4	A mechanism should be included where fishermen can complain about abusive practices without fear of reprisals.	This is inlcuded under L8, grievance mechanism.	No change
	Recommend changing term from "workers" to "fishers" to be consistent with rest of document.	Wording to be updated to use the word 'fisher' instead of worker. We will be consistent throughout and ensure we define early in the standard that the word 'fisher' refers to fishers and other workers onboard the vessels or of the fishing operation.	Fishery Client confirms that there is no harsh or inhumane treatment of fishers within the Fisher Group. Any prior reports of such by fishers or stakeholders are investigated and reported.
L5	The standard should differentiate cultural aspects from child labor. In underdeveloped countries there is a practice in which fishermen go out with their children to fish as a learning method.	We have tried to do this within footnote 17, where we allow children under 16 to accompany their guardians and complete light work. We were cognisant precisly of the cultural norms of these practices and do not want to associate children accompanying their parents to go fishing with child labour.	No change
	Include hazardous child labor and definition.	Definitions of hazardous child labour to the included in guidance	Guidance added to L6
L6	It is difficult to demonstrate the assignment of tasks to young people that may be detrimental to their integrity. The standard must include some method of evidencing this assignment of these tasks.	There will be guidance offered, to both the client in completing the Self-assessment and to the auditor in completing the audit on how this can be approriately evidenced and then evaluated. This type of guidance is not included in the standard but rather in the action documents used by the client and the CAB.	Guidance added
	This may need additional guidance. In many audit systems, all work on board vessels is considered "hazardous work". Additionally, either here or in the health and safety section recommend including something about ensuring young workers have access to PPE, extra training on how to perform their role safely, etc.	As for L5	L6 guidance added
	Or interfere with their educational development, including young girls assisting with any unpaid care and domestic work.	While this is an important topic it is out of scope and not auditable in the context of this standard.	No change

Labour Rights	L7	Consider contextualizing this to not only relate to trade unions, collective bargaining, etc.... but also to form and join small-scale fisher associations that may do things like negotiate prices with processing plants. Current terminology is very centered around a formal employment context. (Unless this is covered elsewhere in the standard)	Agreed that this is important. Footnote 19 should be updated to give this less formal associating meaning and visibility.	Footnkte 19 made more wide
	L8	Should there be something more explicity in CC standard related to remedy or corrective action? You are addressing grievances, but even in small-scale context, remediating confirmed grievances makes sense -- e.g. if the vessel fishers worked on didn't pay them as agreed, the GM should ensure they get paid if they lodge a complaint and that complaint is verified. Also the minimum requirement mentions resolution, but it's not mentioned in the target. It would make sense to add "AND resolve" grievances here.	This note relates to G8 generally: Agree to update requirment and guidance	L8 point 5 the mech if used is effective. Clause modified
		Both the minimum requirement and target are too weak to be meaningful. “Committed to developing effective means” doesn’t actually require the development of effective means. Worker voice systems must have protection and legitimacy from workers without fear of repercussions. There needs to be much more vetting and approval of the mechanism rather than let CABs decide if it’s good enough. There are so few examples of worker voice mechanisms that don’t hide problems that this vague standard will exacerbate the problem without greater specifics.	This is part of the standard and must be evaluated independently through the 3rd part auditing system. We will look to provide a default grievance system if desired by client.	No change
		Would be good to include requirement to ensure effectiveness of the GM and refer to the UNGP characteristics of effective grievance mechanisms as the baseline to monitor effectiveness against. Might be good to try to provide some guidance or expectations when it comes to informal or existing grievance systems suitable for a SSF context that might not be what is typically thought of when we think about GMs (ie bylaws within a fishing cooperative that dictate how grievances must be handled).	Noted and guidance updated accordingly as above	Text amended
	L9	In Ecuador and Peru, artisanal fisheries take more than 30 days of travel on mahi mahi and squid fisheries. The documented agreements could be extended to trips of 40 days. Otherwise, this would be very bureaucratic for the vessel owners of these fisheries.	While this is a good point, it is appropriate to set a limit and not to try and accomodate every fishery there is. Vessels that have extended period of time at sea are those where typically more agregious things could be happening and hence are those that need a contract and we believe 30 days is a fair cut-off. The ILO does not put a cap on number of days at sea after which a written contract is required	No change
		We think that there should be a written contract for any migrant workers that were recruited from a different country.	This feels appropriate and is also noted in ILO 188 - If the fisher is a migrant worker or being hired across borders, having a written contract becomes even more crucial to protect their rights and outline conditions clearly. This addition is included	Clause amended such that migrant workers need to have written contracts
	L10	Verifying if this is applicable when we think about terms and agreements between fishers and their buyers? Then also might be good to include something about seeing products being weighed and graded as part of pay transparency if they are being paid via payment share. (1.1.2b and 3.2.4 in the SRA as reference).	This does not aim to verify the correct payments between buyer and vessel. It aims to verify if the crew are being payed appropriately by the vessel owner or employer. However, it is correct that in a catch share situation the rate would be relevant based on the weighing and payment coming from the first buyer. This is captured currently in footnote 22. This can be made more explicit within this footnote.	Footnote 22 to include transparency in catch share scenarios
	L11	It should be explicit that the deductions should not total more than the take home wage and the calculation of deductions should also include any associated recruitment fees even if it is through another company.	This probably too difficult to define in this way, we rely instead on informed consent. We will monitor this in future	No change
		Not fully understanding the difference between the minimum and target requirements here.	At the MT level, the client confirms that processes are appropriate. At the TR level this needs to be evidenced.	no change
	Footnote 25	maybe worth including in the footnote here that payments to all employees should be traceable and transparent (esp for women and marginalized groups). In situations where women and marginalized groups are vulnerable to losing control over their incomes, particular attention should be placed on payment mechanisms.	Addition to footnote 25 to cover this	no change

	L12	As mentioned above, artisanal fisheries in Ecuador and Peru operate for over 20 days. In these cases, special regimes could be established to adapt to these fisheries and safeguard the health and safety of workers.	In footnote 26 it states thast there should be 1 day off in 7 or equivaelnt. This allows for longer trips where they may not be able to take that day off but then should be given 2-3 days off between trips to compensate. In the case of the Peru fishery it would just be important that the maximum no. of hours worked consequitevly or in a day is not exceeded and that the fishers on board the vessels are aware of these rules.	no change
		Wondering if there's a progression here that looks at the root of why fishers might be working excessive hours. There may be exogenous factors that "force" independent fishers to work hours that can be dangerous because they need to earn enough income.	While certainly of interest, it is out of scope of the standard to identify this and indeed to be able to deal with the results of such findings.	no change
	L13	In Ecuador and Peru, fishermen on the same boat have different ranks and functions. Therefore, they cannot be treated equally.	This is well noted and also the situation in other fisheries/countries. We will make a change to the footnote to take account of this.	Remove 'fishers trerated equally'.
		There are cases within SSF, where foreigners who migrated and are not legally authorized to work in a different country but are hired or work in some fisheries. Following the definition of G8 and G9, should this be considered discrimination if this is the case to deny hiring? Or not?	This would not be considered discrimination. The legal framewwork of the country within which the fishery is conducted must be followed.	No change
	L1-3	•In contrast to Section D, Section L is much stronger and has significantly better target requirements that actually set a performance standard. However, linking back to comments on the process requirements, it is very unclear to the point of being inconceivable that these requirements could be assessed adequately without undertaking a site visit. •Further, if a CAB is to undertake a labour assessment in a credible way, specific skills, training and experience will be required of the assessors. As noted earlier, the ASF's position is that dedicated assessments are required to understand labour rights issues, and that doing limited checks or inexpert assessments as part of CC may be worse than doing nothing.	We will have the appropriate standard and requirments set for any auditors taking on CC assessments. Additionally, we will be using the fisher survey, as described on previous comments from ASF, as one way to ensure there are credible ways of verifying social and labour performance within the fisheries joining the initiative.	Auditor competencies and guidance to be fully developed. Also guidance on conducting audits in a risk-based way. Our Fisher survey will also be relevant here.
	H	Should anything be included here regarding any legal compensation minimums for workers who suffer injury or illness?	addressed in line 119	See below
		Where RFVS is specified by UK retailers, will it be recognised as equivalent?	An equivalency process will be investigated with RFVS and other standards.	No Change
		Wondering if you have considered some form of communication equipment for vessels to communicate accidents to shore for timely response as needed. Perhaps a target requirement if deemed too difficult for the SSF context, but is a valuable consideration.	While we agree that this would be a useful and important addition to SSF vessels, it is out of scope for our standard to mandate this. Reference to existing and affordable communication tools will be made in our guidance, helping to direct SSFs to these types of solutions.	No Change - H7
	H1	It must be specified who will carry out the investigations to determine the causes of the accident.	The text in the target requirement already includes reference to "the fishery client or a designated senior representative".	No Change
		Should there be more required in CC Standard related to medical response? E.g. responsibility for ensuring anyone injured has access to treatment (or at least trying to support that?)? Consider looking at this in more detail for feedback.	This is a relevant and important addition. The standard, to date, only includes prevention and corrective actions related to accidents and does not deal with the actual injuries occurred. A new performance indicator to incorporate this suggestion has been added - temporarily numbered H1A.	New PI H1A.

Health & Safety	h1-7	•These H7S requirements are better than those for Community Development in Section D, and the target requirements set a performance standard. •However, if they are to be assessed in a credible way, as for the labour requirements, it is apparent that the CAB would require specific skills, training and experience. •It is also unclear to the point of being inconceivable that these requirements could be assessed remotely in a credible way.	There is a requirement, through the various benchmarking processes and quality meausures which CC is undergoing, that CC, as the standard holder, defines the auditing and technical requirments of the auditors, this will include the ability to evaluate social issues including Health and Safety aspects. We agree that remotely evaluating these aspects is a difficult task and we are working on several ways to make this both feasible and credible. On-site visits is one option, but difficult and expensive and so intended for only hiugh risk situations. We are also developing a fisher survey. This survey will be deployed to the fishers within the specified group and will look for a credible level of % response. The answers from this survey will go towards triangulating the responses which are submitted by the fishery client in the self-assessment. Additionally, there will be guidance and support given to the fishery client to prepare and submit reliable forms of evidence. CC will be working with the CABs to identify what these forms of evidence could be.	No change
	H3,4,5	These requirements are ambiguous and can be interpreted in different ways. Minimum requirements could be developed with scales that can be measured or verified.	We will investigate guidance, and continue to monitor, these PIs	Guidance to be added to provide clarity
	H3	Fishing vessels are seaworthy and fit for purpose in terms of their size, design and equipment •It is unclear how a CAB would be able to determine compliance with this requirement without appropriate marine surveyor qualifications and experience, and without knowledge of the legal requirements in place for the fishery / vessels. •This is another requirement that it is very hard to imagine being verified remotely.	We agree that remotely evaluating these aspects is a difficult task and we are working on several ways to make this both feasible and credible. We have developed and will deploy a fisher survey. This survey will be deployed to the fishers within the specified group and will look for a credible level of % response. The answers from this survey will go towards triangulating the responses which are submitted by the fishery client in the self-assessment. Additionally, there will be guidance and support given to the fishery client to prepare and submit reliable forms of evidence. CC will be working with the CABs to identify what these forms of evidence could be.	As above
		Similarly to the previous row, legislation normally focuses on minimal requirements for vessels' seaworthiness (safety). Doesn't this aspect of the law cover G9?	As above	No change
	H4	Conditions on the fishing vessel are safe and hygienic31. Fisher accommodation spaces are of sufficient size and appropriately furnished for the nature and duration of fishing operations. •It is not clear how this requirement could be assessed consistently between CABs / fisheries. How are 'safe', 'hygienic', 'sufficient size' and 'appropriately furnished' defined? •This is another requirement that it is very hard to imagine being verified remotely.	We have provided guidance to give an indication on what is deemed safe and hygenic. We agree that remotely evaluating these aspects is a difficult task and we are working on several ways to make this both feasible and credible. We have developed and will deploy a fisher survey. This survey will be deployed to the fishers within the specified group and will look for a credible level of % response. The answers from this survey will go towards triangulating the responses which are submitted by the fishery client in the self-assessment. Additionally, there will be guidance and support given to the fishery client to prepare and submit reliable forms of evidence. CC will be working with the CABs to identify what these forms of evidence could be.	Guidance added
		I assume this will align with at least some of the existing international requirements?	ILO 188 has specific guidelines on these matters but this is relevant to vessels >24m. We have adopted followed this guidance to the extent we think is practical on small-scale vessels. We have very much followed the ETI basecode guidance.	No change
	H5	'food of adequate nutritional value'. In addition to nutritional value any food available to crew members should respect any religious beliefs, restrictions, or dietary requirements of those individuals.	Changes taken on board, updates in PI wording	
		Maybe specify that this should mean internal locks on doors where possible?	This suggestion will be added as guidance	Guidance
	H6	Access to training for fishermen must be ensured. Sometimes, requirements, such as knowing how to read, prevent access to these trainings.	Text modified to meet this situation	Text amended

	H7	See comment above in H1 related to medical response. Here, H7 covers first aid equipment, but nothing further about responsibility for medical response. Also recommend adding something on a min standard for what fishers are entitled for when they experience illness or injury (compensation).	Medical response has been incorporated as a new PI. Having discussed compensation for illness or injury, we have agreed that this is out of scope for SSFs, due to the informal nature of many of their operations and employments. There will be a new requirmenet (in H1) covering medical response including, as a minimum, covering emergency medical treatment and remuneration for work carried out.	New requirement added in H1
		Fishers have ready access to appropriate safety equipment33 including: 1. Personal Protective Equipment (PPE) and Personal Flotation Devices (PFDs) as needed. •How is the 'as needed' defined, here? PFDs may not be required for intertidal fisheries, but should always be required aboard vessels.	The words 'as needed' will be removed in order to ensure no ambiguity is read into the requirments. The note on intertidal fishers vs vessel based fisheries can be included in the foot note as an addition.	Text amended
		Curious why there is no minimum requirement here?	We specifically decided not to exclude any fisheries for not having the various pieces of safety equipment for joining the program, but instead decided to give the groups a fixed timeline for having all the equipment on board their vessels, This decision was made due to the knowledge that this is a financial investment not all fisheries may be able to afford immeditaley, but we felt it important to ensure a timeline was attached.	No change
	S	Same comment as G. Information unlikely to come from self-assessment.		Guidance to be provided on auditing requiremnets.
		The link to the section "requirements specific to multispecies fisheries" was not active. This led to the question of how the scoring of S1 to S4 would be completed when some species might score better than others.		Amended
		How will traceability through the supply chain be controlled and monitored?	CoC to be developed	CoC to be developed
		Footnote 35 states, 'All species less vulnerable than the managed target species require no additional management interventions'. What criteria are considered in assessing species vulnerability. Might be useful to include these for clarity.	Guidance to be developed	Guidance
		Footnote 35 states incorrectly states that "target species is most vulnerable to fishing activity so other species have protection". This contradicts the guidance in Section B. Obviously there are many reasons why other species and habitats are not adequately managed or protected by having MSY on the target species.	Section S deals with commercially exploited species. There are other risks to bycatches, threatened species and habitats, but these are addressed in different ways than MSY (or equivalent) in targetted species. See below	Footnote 35 updated: All species less vulnerable than the managed target species require no additional management interventions; for more vulnerable species, there are requirements to a) monitor vulnerable species and b) to ensure all commercial species are above PRI.

Recognised Species	S1	Harvest objectives for managed stock(s)35 35 Managed stocks are those stocks or species groups within the fishery that are explicitly managed to meet conservation objectives. In multispecies fisheries, these are likely to cover only a proportion of the catch and would often be the most abundant and/or valuable species (the 'target' species). It is not expected that objectives and monitoring will be in place for every species - in most cases the target species are monitored and used to regulate the harvest. The implicit assumption is that the target species is most vulnerable to fishing activity so other species have protection as their fishing mortality relative to MSY would be less than that of the target species. All species less vulnerable than the managed target species require no additional management interventions. •For multi-species fisheries there is a potentially important mismatch here between statements, that 1) the explicitly managed stocks would often be the most abundant and/or valuable and 2) the implicit assumption that the target species is most vulnerable to fishing activity. Within multi-species fisheries, there is no reason at all to expect the most abundant to be the most vulnerable, such that management for other species is not required. In a multispecies approach relying on management of the most vulnerable species, there is a need to determine which species is/are most vulnerable, and then to manage for that/those species. It should be expected that evidence is presented for each fishery, rather than relying on general assumptions. •We note our comments appear to be in line with later parts of the Standard (Footnote 43 where it states: "other recognised species may be more vulnerable to overfishing than the target species."	The difference here is one of managing to a target reference point (such as MSY) and preventng overfishing of vulnerable species. Maintaining the most vulnerable species at MSY is to require a lot of harvestable biomass (including the target species) is left unexploited. This is considered a situation that is unfeasible for fishery managers and commercial fisheries. Footnote 43 does require better monitoring of vulnerable stocks and clause S4 requires 'All commercial stocks are at low risk of being depleted below their Point of Recruitment Impairment (PRI) '. This is all considered consistent, and will be made clearer in guidance.	Footnote 35 updated: All species less vulnerable than the managed target species require no additional management interventions; for more vulnerable species, there are requirements to a) monitor vulnerable species and b) to ensure all commercial species are above PRI.
		Is there a maximum age limit on these objectives? Sometimes, management has been set under contexts that are no longer relevant to the fishery's reality.	This is very difficult to specify, but would be considered as an uncertainty in clause S3, where indicators are regularly estimated.	No change
	S2	If referring to an end target/best possible practice, then it should be that the decision-making process has been proven to be effective. If it is only expected to be effective then there isn't there also potential for improvements and adaptations to be required?	May not have been needed or tested	No change
		The Decision-making system is (or is expected) to be effective in achieving the fishery objectives39. This includes, where relevant, the ability to resolve disputes such that necessary decisions are not delayed if a consensus cannot be reached. •Who or what body determines that a system can be expected to be effective, and on what basis is this determined? •We note that footnote 39 states: "Harvest control rules … may be an important tool in the decision-making process but are not necessarily a requirement". But on what basis does a CAB determine that necessary decisions have or have not been 'delayed' – what timescale denotes 'delayed' or otherwise?	1. This would necessarily be a judgement of the CAB based on the evidence presented. 2. Guidance has been added	Guidance
		The standard could differentiate two decision-making systems: a decision system for coastal resources and one for highly migratory species. In the RFMOs, stakeholders participate in the decision-making for migratory species. However, what the standard must guarantee is that artisanal fishermen have representation in RFMO meetings. For example, the IATTC makes decisions for mahi mahi and the SPRFMO for squid. Both fisheries have artisanal components that capture these species in international waters.	Cannot guarantee this, we can only require effective decision making and consultation - there may be any number of ways in which this is achieved.	No change

		Often catch data is not recorded by species, but similar species are combined into groups. This is acceptable if: 1. All species in the group have similar vulnerability to the fishery •Who determines if a group has similar vulnerability, and on what basis?	Further guidance to be provided.	Guidance
	S3	Scientific advice and monitoring feels like CC are forcing small scale fisheries to hire agencies or NGOs. I would add more clarifying language around “advice and monitoring” to be inclusive of cooperative managers or other community members suffice. One of the biggest criticisms of current certifiers is they require typically white people from the north to swoop in to educate and save the brown people from their own practices. Yet, those practices worked fine until the industrial fleets from the North (America, Asia and Europe) started plundering their waters.	Footnote 41 addresses this	No change
	S4	A 25% chance of falling below the PRI is relatively high – ICES, for example, makes catch recommendations with the aim of <5% chance of falling below the limit reference point. I also think this clause could be clearer for assessors. If a stock is currently below the PRI but has a rebuilding plan, does it pass or fail? I think an argument could be made for either based on what’s currently written.	This probability level is consistent with other similar certification schemes. We consider broad equivalence to be appropriate. If the stock is below PRI, it would fail to meet the minimum requirement	No change
		44 ‘Low risk’ is equivalent to a reasonable expectation, evaluated qualitatively, semi-quantitatively (such as through a risk assessment) or quantitatively. Quantitatively, this is equivalent to being below 25%ile probability. •By what metric or means is the qualitative or semi-quantitative evaluation expected to demonstrate ‘low risk’?	Develop risk assessment guidance	Risk Assessment guidance
		45 This would apply to all species within a multispecies operation unless the catches were insignificant •Presumably this is only for all ‘recognised’ species (or all ‘managed’ species?) within a multispecies operation?	For all recognised species	No change
		For the target requirement, a rebuilding plan should be demonstrated to be working; a rebuilding plan that is expected to work is not adequate for a target requirement and should be moved to the minimum requirement section.	It can take a long tome for a rebuilding plan to be demonstrated - the requirmenets for a rebuilding plan are considered sufficient.	No change
		Hoping there will be a template for methods to evaluate risk (e.g., productivity-susceptibility analysis).	Yes	RA guidance
	S5	The standard should require that management objectives be defined. The standard should not be closed only to the MSY; other objectives may be better applicable to fisheries, such as maximum economic yield, where the economic factor could trigger management measures for the sustainability of the resources.	Other objectives acceptable if delivering similar or better outcomes than MSY - such as MEY	Footnote 36 amended.
		It might be helpful to elaborate on how this is different to S1. For example, S1 requires that for most species, “Harvest objectives for managed stock(s) are consistent with a Maximum Sustainable Yield (MSY) target”. S5 requires that key prey species should have “management objectives consistent with maintaining at least a Maximum Sustainable Yield (MSY) target level”. I think I understand the difference but I’m not certain, so extra explanation would be useful.	Guidance added	Guidance
		MSY is likely inadequate if the species is a key prey species. A more conservative target is likely needed.	Not such an issue for SSF - MSY considered appropriate in these cases (i.e. small-scale fisheries not so involved in widespread harvest of small pelagic species)	No change

Climate Change	C	In relation to climate change and considering plans for decarbonisation of fishing fleets more generally, is there any plan to assess carbon footprint of vessel/fleet as part of the assessment. For example, it has been shown in a Cefas report that total emissions by the UK fishing fleet are equivalent to 1.2 Kg CO^2/Kg of fish landed. Is it anticipated that similar calculations will be made for vessels/fleets certified to the CC Standard?	No, this is considered far too olnerous for SSF for the foreseeable future.	No change
		Climate Change – this feels risky to losing CC certification for issues out of the fishers' control. For example, if there is a climate disaster – will the fishers lose certification if they cannot afford climate adaptive hardware or fuels but their practices were aligned?	No, we are more concerned with the effects of climate on SSF than vice versa.	No change
	C1	Data base system of the socio economic household gender/segregated data system		No change
		Consider expanding to relate to documenting not only changes to-date in fishing operations that may have been driven in part or wholly by climate change, but looking forward and identifying potential and/or anticipated changes in operations. Language in the requirement could be "and/or" so they document changes to date and/or anticipated changes-- that would encourage them to look forward without it being a big burden. Looking forward in that way is actually needed to effectively think about adaptation.	This seems to require a lot of guesswork. Seems better to deal with actualities.	No change
	C2	Is this N/A if there are no active projects on climate adaptation and resilience?	Yes	Guidance
		The Fishery Client and Fisher Group cooperates in the development and implementation of any strategies for monitoring of, adaptation to, and mitigation of, the effects of climate change49 •Presumably this is "any strategies for monitoring of, adaptation to, and mitigation of the effects of climate change on the target (or managed) fisheries?" As written, this requirement is not bound solely to fisheries issues.	Yes	Clarify: relevant to the fishery within which the fisher group operates
		Warning system/preparedness/capacity building/promote and support coastal resource conservation areas, Community mangrove forest conservation. .	Some of this in guidance	Guidance
	C3	Fishers have access to relevant information on gear modifications or vessel modifications or operational measures which would increase energy efficiency or reduce usage. Any measures implemented shall be reported.		
	W	This section is particularly weak, especially given the low level of knowledge on animal welfare for most fishers. CC should be more specific on required actions, perhaps using guidance from Aquatic Life Institute (ALI), or make the information directly accessible without fisher groups having to search.	It is the intention that Community Catch, through its digital platform, will give guidance per section and per performance indicator on where information/advice can be found and where the fisheries can turn for support on given topics. Ideally we will build out the Animal Welfare section to include guidance on where better or best practice for as many gears and species as exist in the public realm and be able to point fisheries towards resources, including ALI, where information and advice can be sought. We have built this section specifically to be a learning and awareness building opportunity. It is not our intention to exclude fisheries based on their animal welfare actions. We endeavour to create awareness and incentivize improvements over time.	No Change
		Consider a requirement under this section for fishers not to employ any methods that harass or injure wildlife/Threatened species (e.g., shooting at seals, etc.)	The interaction of the fishing activity with threatened species falls under the biodiversity section. The standard requires that information on these potential interactions is known and that ongoing information is collected to reliably estimate the risk or capture, entanglement or injury and to take actions where necessary. Some modifications to the text have been made to make this section clearer.	Modification to footnote

		Animal welfare. Whilst sharks are mentioned and 'measures to reduce post-release mortality of unwanted catches' referred to there is no specific mention of expectations for treatment/welfare of marine mammals and birds that are bycaught, become trapped, entangled etc. in fishing gears.	The interaction of the fishery with bycatch falls under the biodiversity section, where information requirments and where limits to these interactions are specified. Interaction with other speciesis now included as proposed above.	No further change
	W1	Change text to: Information is available on practices employed within the Fisher Group in relation to means of proper catch, handling and killing of aquatic animals.	The proposed text is appropriate and will be intergrated into W1, with the exception of the word 'proper'. At the minimum requirment stage we do not want to specify what proper is, we want to collect information on current status.	Modified to 'Information is available on practices employed within the Fisher Group in relation to means of handling and killing ...'
		Where relevant, fishers have access to information on modifications to gear, vessels or fishing operations which would increase animal welfare. This includes measures to reduce post-release mortality of unwanted catches. •This is listed as an 'information' requirement, but it is not clear what 'where relevant' means here?	"where relevant" in this context refers to fisheries where information on modifications are relevant. It is likely that there will be fisheries that are already employing best practice. Additionally, as animal welfare and changes to gear etc is still a relatively new topic, we are also aware that in some cases with some gears +/or species that there may not yet be information available. In these various cases the fishery will not be required to do anything additional, until such a time that this type of information becomes available. Guidance to clarify this will be added.	Guidance added
		Change Target Requirement text to: Where relevant, fishers have access to information on modifications to gear, vessels or fishing operations which would improve animal welfare. This includes measures to reduce post-release mortality of unwanted catches.	Edits recommended will be accepted.	W1 reworded.
		Change text to: An animal welfare policy is in place.	We are not expecting the fisheries to have an animal welfare policy in place. As noted in comments above we are aimijng for this section to be learning and awareness section where reporting and transprency on methods empoyed is our approach for creating awareness and change over time.	No change
		The target doesn't align with the minimum about landing sharks with fins naturally attached. Does "sharks" include all elasmobranchs? The target requirement should be to demonstrate some kind of training or photos of whole sharks at landings. This is the kind of the thing that needs unannounced visits by someone without conflict of interest to verify independently.	Agreed, we have revamped the performance indicators to ensure more clarity in the individual clauses.	Text amended
Animal Welfare		Any shark products landed are whole carcass with fins naturally attached. •It is unclear how this could be verified, noting we are aware that some stakeholders have been very critical of the MSC's finning requirements where even near-comprehensive observer coverage of vessels has been argued as being insufficient. In v.3.1 of the MSC, 30% is required for RFMO-managed, high seas vessels. G8 and G9 (and footnote 10) allow opportunity for any level of monitoring to be deemed adequate. •What happens if a vessel (or vessels) is found to be non-compliant with the minimum FNA requirement, once or more than once?	We will develop specific guidance relating to evidence requirements and risk	Separate guidance

	W2	Strategies to increase animal welfare, appropriate to the Fisher Group, are identified. Any measures implemented shall be reported50 50 This may include strategies relating to reducing mortality of Threatened species and other bycatches, including reduction of ghost fishing. •This is listed as a 'management' requirement, but it does not set a performance requirement for the fleet (e.g., "any measures identified as appropriate to the Fisher Group are implemented'). As it stands, this requirement may help to raise awareness of potential options to improve welfare, but no more than that. •Footnote 50 implies this is intended to be related to much more than just the landed catch, but fisher groups and CABs should have more guidance on what is intended, here – i.e. what is meant by 'welfare' (e.g., the treatment of animals that are caught by or interact with the gears or vessels in any way) , which species categories (all), which aspects (landed, discarded, ghost caught or otherwise interacting animals). •The reference to ghost fishing here is odd when it would seem to fit much better / more naturally within Section B (B3, B6, B9).	Point 1: This is indeed our intent Point 2: Guidance provided Point 3: Agreed	Guidance
		Change Target Requirement text to: Assess the current status of catch, bycatch and risk of lost gear and devise strategies with animal welfare organizations to incorporate or improve aquatic animal welfare, appropriate to the Fisher Group. Policies shall be made publicly-available. Any measures implemented shall be reported.	As above, this is considered too onerous a requirement, given the current state of development of this issue, for global small-scale fisheries	No change
	W3	Add a new performance indicator: W3 Capture	Changes will be made to the performance indicators to more apporoproriately incorporate the catching, retrieval and handling of the fishing activity. We will continue to only require reporting of existing approaches and the requirment of the fishery to inform themselves on better and best practice in the field linked to their fishing gear and species. We think this is the most appropriate way to deal with this topic at this early stage of our program.	No change
		Add minimum requirement: Use of low-impact fishing methods.	See above	No change
		Add target requirement: The use of low-impact fishing gear should be species-specific and not be detrimental to local ecosystems or fish populations. Uptake should be encouraged.	See above	No change
	W4	Add a new performance indicator: W4 Retrieval	See above	No change
		Add minimum requirement: Gentle retrieval practices	See above	No change
		Add target requirement: Bring aquatic animals to the surface slowly to help reduce traumatic injuries and increase the chances of survival in case of release.	Addressed above - such requirements are really too specific to be practicable across the board.	No change
	W5	Add a new performance indicator: Onboard handling	See above	No change
		Add minimum requirement: Removal of animal body parts is prohibited.	See above	No change
		Add target requirement: Examples of routine mutilation practices typically done for economic reasons or for ease of handling include: ○ Bleeding out fishes by having their gills cut. ○ Removal of body parts (e.g., declawing of crabs, bill removal from billfish such as marlin and swordfish, shark finning, and wing removal from elasmobranchs such as skates and rays.)	See above	No change
	W6	Add a new performance indicator: Stunning and slaughter	See above	No change
		Add minimum requirement: Raise awareness on introducing stunning before slaughtering.	See above	No change
		Add target requirement: Fishers have access to information and initiate improvements such as collaborations and pilot projects to introduce improved stunning and slaughter practices onboard. The use of salt-baths and asphyxiation in ice slurries should be banned. These methods are associated with poor welfare outcomes and as such, are prohibited by the World Organization for Animal Health (WOAH).	See above	No change

	B	Some IUCN reports are more than 10 years old. Can we still use them as references for some of the ETP species?	Environmental information is often imperfect. The best we can do seems to be to use the best scientific information available and minimise impacts where we can.	No change
		Inclusion of Prohibited Species e.g. whales?	This will essentially be a matter of compliance with fishery management regulations - monitored under fishery management.	No change
	B1	Should be clarified that there needs to be sufficient information on actual interactions, not just overlap or potential interactions.	This is the second requirement in B1	No change
		There is sufficient, ongoing information on • the nature of gear used and • the overlap of Fisher Group gear use with populations of Threatened Species to reliably estimate the risk of capture, entanglement or other interaction causing injury/mortality. Information about the local situation may be complemented by information from similar situations elsewhere. Information shall be confirmed by quantitative data relevant to the Fisher Group or verification by one or more independent sources. •Are impacts from ghost fishing considered, here? That would be appropriate as part of understanding and managing the overall impact of the fishery. •It is not clear what 'Or verification by one or more independent sources' means in this case. Does verification mean data, or does it mean that an independent (but presumably knowledgeable) individual could declare that the risk is as stated?	1. Ghost fishing is addressed in a separate part of the standard - reflecting the difficulties of determining the effects of this potential source of mortality 2. It could mean either or both of these. We will seek to clarify this further in general guidance on sources of evidence.	General guidance
		If Sufficient information is available to show that Threatened Species would not normally be killed or injured by gear used in the Fisher Group: Or the Fisher Group is a LOW risk to Threatened Species, then remaining Threatened Species indicators are N/A •In this context, what is 'sufficient' information, and what is 'not normally killed'? •And how is LOW risk defined?	Guidance has been added to clarify both of these issues.	Guidance
		Document information from SSF communities regarding different species at present and species available in the past 20 years. Assessment of the socio economic of SSF group. Information of endanger species in that particular ecosystem	This seems a difficult exercise with relatively low returns?	No change
	B2	Fisher group being no more than a MEDIUM risk to a threatened species is too low of a bar, and this appears to conflict with B3 (Management) where the risk posed by the fisher group must be low.	Medium risk requires management to reduce risk to LOW	No change
		How are MEDIUM and HIGH risk defined?	Further guidance will be provided on risk assessments	General guidance
		Species that disappear from that particular area		No change
	B1-3	I don't understand why 'Threatened species' does not include Vulnerable (VU) and Endangered (EN) for all species, including sharks and bony fish. This should be changed.	The categorisation of commercial spp by IUCN is often not as relevant as a stock assessment. We are generally in line with other schemes such as MSC which uses EN and CR for chondrichthyans and CR or EN for bony fish, but with modifications thast are probably too complex for SSF situations.	No change
		Monitoring system /Report of the species catch of Fishers groups/SSF	Included	No change

Biodiversity	B3	Measures are in place to limit mortality of Threatened species arising from the Fisher Group. Measures (formal or informal management actions) shall be implemented to reduce mortalities such that the risk posed by the Fisher Group is LOW, or mortalities are maintained within regulated limits. • It would be very hard for a fishery NOT to meet the first requirement (i.e., measures are in place to limit mortality). In essence, any feature of the fishery could be argued to meet this requirement – gear type, fishing area, fishing season, non-retention, the lack of direct targeting, etc – it does not set a performance standard, and it could be deleted in favour of the second requirement (subject to clarification). • The second requirement, here (i.e., measures shall be implemented…), may be adequate on its own to be credible if two issues are addressed: o It is not clear over what timescale the measures need to be implemented. o There may be no regulated limits, which (employing the 'or') arguably allows this requirement to be met by default as written.	Agreed. These two requirements have been merged. Timescales would be determined by the client action plan Footnote 53 reworded	Footnote 53 amended.
		Measures shall be implemented' sounds like a joke, given past experience with fisheries and fishery management. It will never be done if only conditional. Make it a 'must'. There should also be monitoring to make sure that implementation is effective, not merely a 'fake aspiration'.	Shall, in this context, means must. This will be a requirement of the client action plan.	No change
	B4	How much catch composition coverage would be valuable in identifying and selecting the "main" species? One fishing season or two or five? Considering climate change and species distribution changes, which normally is reflected in catch compositions	General guidance will be proded to clarify information requirements, five years being ideal, three good but recognising data deficiencies	General guidance
		• Where do species that are not 'threatened' but which are nevertheless not abundant fit into the CC Standard? Currently, it would seem that a marine mammal or seabird species that is NT, LC or DD comprising 4% of the catch could be ignored in the assessment, which seems inappropriate and a very significant risk for credibility.	We seek to balance the desire to reduce unwanted catches and the costs and associated difficulties of collecting large amounts of information in SSF situations which are often data deficient. Our aim is that available 'capital' is utilised on issues of significant concern - not, for example, a IUCN 'Least Concern' species that may very occasionally be impacted by a fishery at levels which would not cause a population-level effect. The 5% cut-off has been proven elsewhere and seems an appropriate and consistent measure to use.	No change
		There is sufficient, ongoing information on bycatches to identify those 'main' species which comprise a substantial proportion [over 5% on average] of the total catch (including estimates of discards). Information can be confirmed by quantitative data or verification by one or more independent sources. • Are impacts from ghost fishing considered, here? That would be appropriate as part of understanding and managing the overall impact of the fishery. • As previously, it is not clear what 'Or verification by one or more independent sources' means in this case. Does verification mean data, or does it mean that an independent (but presumably knowledgeable) individual could declare that the risk is as stated?	Impacts from ghost fishing are extremely difficult to obtain. B10 and B11 seek to reduce lost gear and ghost fishing. This seems an appropriate response at this time. Yes, verification can be from different sources. We will expand on this in general guidance.	General guidance
		Monitoring system /Report of the juvenile species s catch of Fishers groups/SSF related to different fishing gears used.	Reporting requirements will be consistent irrespective of gear type.	No change
	B5	For main stocks] a Risk Assessment indicates 'low' risk of the Fisher Group causing overfishing. • How is 'low risk' defined here?	Guidance to be provided on risk assessments.	General guidance
		Statistic system and Report of the amount of different species s catch in relation to different fishing gears use	Reporting requirements will be consistent irrespective of gear type.	No change

B5-6	B5: If catches by the Fisher Group are not expected to cause overfishing of 'main' stocks, then remaining bycatch indicators are N/A B6: Measures are in place which are expected to ensure that the Fisher Group does not cause overfishing of main bycatch species. • It is not clear how these two requirements interact – in what circumstances would B6 be met but not B5?	If B5 is met, B6 would not be required. Only if catches by the Fisher Group were expected to cause overfishing of 'main' stocks would management measures be required. Use of skip logic in our developing digital platform will make this clearer.	No change
B6	In the case of incidentally captured species that are overexploited, the standard must require management measures to recover those stokcs.	We look to measures to limit the effect of the Fisher Group to sustainable levels. This is really the limit of what we can require.	No change
	Measures announced by authority regarding the types of fishing gears permit of the commercial fishers and SSF		No change
	This does not include any sort of requirement to reduce bycatch unless it's causing overfishing; I don't think this is in line with the precautionary approach. If there are reasonable ways a fishery can reduce bycatch, it should.	This is addressed in section W2.	No change
B7	Footnote 53 ' Vulnerable means habitats whose structure and function could potentially be disrupted to the extent that it would no longer provide critical elements of its natural contribution to the local ecosystem' is very much based in the MSC Standard, where it is being abused not to interpret any habitat as vulnerable. If you truly strive to protect vulnerable habitats, make this point clearer and come up with an effective framework.	We try to avoid making requirements on SSF that are not cost effective in terms of their outcomes. We consider this apropriate, but will monitor outcomes.	No change
	Record of authority on illegal fising		No change
	The locations of habitats vulnerable53 to physical harm by Fisher Group fishing gear are known. •This is potentially a very demanding requirement to meet. What extent of habitat needs to be considered, though – small patches as well as larger areas? And how is this verified?	Firstly, skip-logic would restrict this section to fisheries with mobile gear. We will add guidance on this requirement.	B7 and guidance.
	There is a clause 'If the gear used is pelagic and does not ordinarily interact with bottom habitat, then remaining habitat indicators are N/A'. Does this account for ghost gear? E.g. the loss of FADs can have detrimental effects on habitats. I however wonder whether they will be exempt from the rest of the habitat indicators, which would not be OK.	This is very difficult to evaluate for SSF. Not included, but loss of gear covered in B10/B11	
B 7 and 9	Information and Management of habitat. Suggest these sections include specific reference to MPAs.	B7 minimum requirements. SSF often allowed in MPAs	No further change
B8	Information should allow determination of whether the Fisher Group threatens such loss of habitat as would cause its extinction or cause a loss of its ecosystem function/service within the full range of the habitat. If the determination shows no such threats, or a risk assessment shows 'low' risk from the Fisher Group, then remaining habitat indicators are N/A. •For the first requirement, here, over what timescale does the threat of extinction or loss of ecosystem function need to determined? •How is loss of ecosystem function / service determined? •How is 'low' risk determined?	Guidance has been aded on these terms. Risk assessment will be covered in General Guidance.	Guidance.
	Quota system		No change
	Participatory meeting to develop measures to address unwanted fishing gears, and establish mechanism for implementing and monitoring agreed action plan among appropriate to ecosystem of the target communities.	Guidance on this will be provided, but this is one of many poetntial solutions.	General guidance

	B11	Fishers participate in any relevant lost gear reporting and/or recovery initiatives or procedures. Any unwanted fishing gear is returned to shore. The Fishery Client shall report on any measures taken to reduce or recover lost or discarded fishing gear. •This is listed as a 'management' requirement, but it does not set a performance requirement for the fleet (e.g., "relevant modifications to gear, vessels or fishing operations which would reduce gear loss and/or ghost fishing are implemented'). As it stands, this requirement may help to raise awareness of potential options to reduce ghost fishing, but no more than that.	The intent of B10and B11 is to raise awareness of the issue, to require participation in relevant initiatives and to require return of unwanted gear to shore. Wholesale changes of gear etc is not reasonable as a requirement, but we seek to influence perception and attitudes to this issue.	No change
	B12	Provide Information on onshore waste disposal/recycling facilities and initiate Community project on community waste management	Cannot be done by CC on a global scale	No change