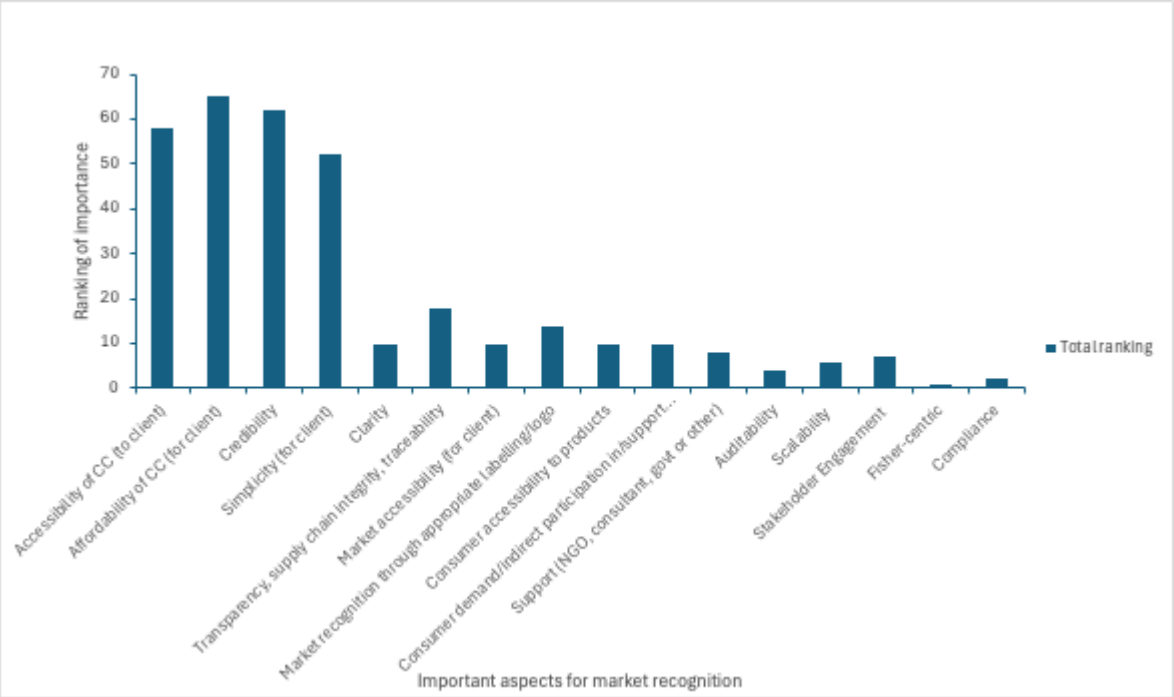
Responses to Consultation General Questions

As part of the First Consultation (June 2024), we asked a series of general questions to determine wider views among the small-scale fishery related community to some particular issues of concern to us in developing Community Catch. We have presented here the data on people's responses (quantitative) and the supporting views expressed. We also identify our take-away messages on each issue.

1. Certification has significant cost and resource requirements. Community Catch has been developed to maximise Accessibility and Affordability for small-scale fishery clients, but also maintaining the Credibility essential in a successful market recognition programme. To achieve this, we think simplicity and clarity to be essential. Please add any other issues you feel are important and rank from 1 (least important) onwards.



Consultation responses providing further comment on ranking choices.

Response No.	Comments
	ACCESSIBILITY
1	Public awareness and consumer prioritisation of sustainability – including social sustainability and ethical issues such as catch welfare - over other attributes i.e. cost, familiarity etc. are basic requirements for the success of this and any market-based instrument. As such it is crucial that all consumers are made aware of the need to protect our marine resources by making the right seafood choices, helping to conserve

	local communities, protect livelihoods, skills, and ecological and environmental interests.
2	It is important that the Community Catch Initiative is accepted widely as a positive Initiative which will allow SSF around the world to demonstrate their credentials and engage in effective improvement plans to improve areas of the fishery and its community. The alternative is that SSF remain 'stuck' unable to move forward and not engaging in the improvement agendas requried
3	Accessibility, affordability and simplicity are related issues. If a Standard is too expensive or too complex it becomes inaccessible. Rating these as the lowest of the issues is not to say they are not important, however – it is simply that they are not considered as important as other issues rated higher.
4	Accessibility, credibility, and simplicity are all interconnected and so it's difficult to distinguish between them. If the process is not affordable, the process is inaccessible by default and falls into the same trap as other standards. Simplicity is also linked to accessibility as it determines how fisheries and communities can actually engage; it does not entirely prevent participation as the other issues do, but it does limit the benefits and impact. Credibility is a highly subjective issue and the more evidence that is required the higher the associated costs which will lead to further exclusion of SSF. Credibility is definitely important; however, this can also be built over time through the engagement with the standard. It may have been helpful to have a definition of each of these as they can be highly subjective.
	AFFORDABILITY
5	The CAB/certifier needs to be paid for the system to work. Keeping costs low and providing support (both financial and in understanding the standard and process) is essential for fisheries to succeed in the long term. Affordability, Support and Simplicity are therefore the most important – the other things don't matter if the program can't sustain itself.
6	The current standards for sustainable fisheries are expensive and have requirements far from the reality of an artisanal fishery in a developing fishery. Therefore, having an affordable and accessible standard is what should be prioritized.
7	All of these are important. Affordability is the one that is very difficult to achieve especially when including 3rd party reviewers. I would suggest the standard could think about 1) A training programme on the standard for reviewers that live in the country where the fishery is (and ideally live close to the fishery so they can visit); 2) A system where within the self-assessment the fishery identifies indicators which are what are measured at each audit (otherwise a lot of time goes into trying to determine whether the evidence meets the standard and/or a lot of time is spent giving auditors complicated guidance on how to achieve this.) 3) Streamline on the online portal. Make as much use of video and digital uploads via phones as possible. 4) Team up with a local NGO that can help support the process and help attract funding. The system requires a

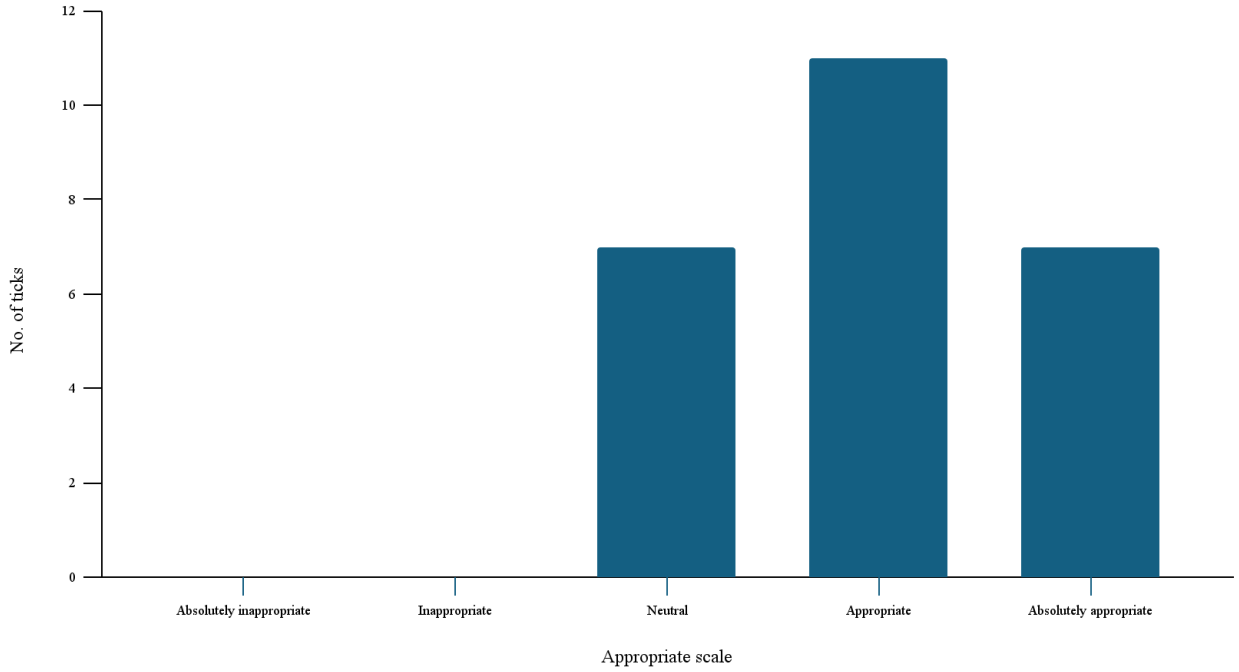
	certain amount of literacy (and time-investment) which may not always be available within small-scale fishery communities.
	CREDIBILITY
8	If you don't have a credible certification standard, then it doesn't really matter if it is accessible / affordable or simple because if it isn't backed and in turn used, then the other points become irrelevant.
9	Without Credibility, as a recognised certification by UK retailers, then all the other issues are mute.
10	It is difficult to rank the above issues as they are all crucial in the certification process. It is important to find a balance among all of them.
11	Credibility of community catch is the most important as without credibility, it is increasingly challenging to get the market onboard; especially given integrity challenges MSC and Seafood Watch are facing. Affordability is the next important as both (a) a measure of inclusivity/accessibility and (b) impact to cost of goods with simplicity to follow. I added accessibility in between affordable and simple but I truly feel accessibility is a reflection of affordability and simplicity.
12	I've added a compliance dimension because credibility by itself is the degree that people believe in the system. Equally important is the degree to which the system actually includes checks to make sure that what is claimed is real.
13	Credibility should consider the market, but also fishers and other stakeholders: on the tool, the process, and on its capacity to deliver economic and/or social benefits (ideally in the short term). All issues seem very important. (Not too clear what you mean by accessibility though. I guess it overlaps a little with Simplicity?)
14	Credibility is the most important issue, by far – it is a critical issue. All other aspects of the Standard are of limited or no value if it is not credible and able to withstand challenge.
	TRANSPARENCY
15	Ensuring that the certification process is transparent can build trust among stakeholders and consumers. Transparency in criteria, evaluation, and decision-making processes is essential for maintaining credibility. The certification program should be scalable, allowing small-scale fisheries from around the world to join, and for existing clients to grow and engage in a continuous improvement process. Continuous engagement with stakeholders, including fishers, communities, NGOs, and market actors, is crucial for adapting the certification process to real-world conditions and ensuring that it remains relevant and effective.
16	Transparency: It is important that stakeholders, including fishery clients, can see how and why decisions are made on 1) modifying the Standard that directly affects the certified / in assessment fishing community, and 2) on decisions made with respect to certifying or not certifying individual fisheries.

17	Transparency as a key component of the initiative
	Justice comes with price transparency. Keep this in mind, opaque supply chains do not ever look out for the needs of the producer
	Transparency is key: Especially on prices. SSFs need to know prices and understand fluctuations
	GENERAL
17	I don't think there should be a ranking. All these points should be addressed at the same time. Of course, there are a trade-off between them, but these have to be balanced.
18	We define "fisher-centric" as reflecting the priorities, values, realities of fishers, fishworkers, and their communities, and acknowledging them as the true beneficiaries of the intervention.
19	Access to data collected by fishers is critical for accurate SFW (Seafood Watch) assessments
20	All elements are needed as it interlinks to each other's.
21	Retailer commitments linked to GSSI recognition
	Innovations need to be compatible with Android phone apps so weather prediction, price updates and improved communication and connectivity to the world is assured and accessible to SSF
	CONSISTENCY
22	To the extent possible given the diverse nature of fishing, it is very important that the CC Standard is seen to be being applied consistently between fisheries.
	STABILITY
23	For business planning engagement and spend, it is very important to have certainty over what is required by the Standard in the short to medium. It is very challenging if a Standard changes regularly, significantly, and/or without warning.
	INCENTIVES
	The incentives for SSF to engage in the improvement and certification program need to be built out- from the perspective of the SSFs, be able to answer the question "what's in it for the me ?"
	EMPOWERMENT/CAPACITY BUILDING
	Its important to use CC system to empower: Information and updates shared to fisher level stakeholders on global issues- Climate change, fish stocks, market dynamics etc → Increased awareness at community level on global issues and on aspects related to global prices is a requirement for SSF empowerment

	Capacity building and empowerment of SSFs is a priority: • To understand global issues and partake in associated initiatives • To band together with other SSFs and be able to lobby governments for change and support • To increasingly and very importantly ensure visibility of SSF, to share their story widely
	COMMUNICATION
	Differentiation and communication of SSFs and their product is key. The world needs to be communicated to
	A communication movement needs to adjoin CC. EveryonE needs to be more aware of SSFs, their actions, products, successes and barriers
	Differentiation of product: People need to, in the future, take product home and actually know that it has come from a SSF
	Communication is key: • Communication inward to SSF communities, especially on prices and on globally issues relevant to SSFs • Communication outwards- making small-scale fisheries visible domestically, regionally and globally • Communication needs to be matched to capacity and connectivity of SSFs • Sharing lessons learned
	Communication needs to be used to enhance visibility

Question 1 Conclusions
Accessibility, affordability, credibility and simplicity were all highly ranked, and roughly equally, although it is interesting that affordability was the highest ranked of these, followed by credibility. The key challenge for Community Catch is to provide an affordable (and accessible and simple) initiative that maintains the credibility of the results provided. We believe (a belief supported by consultations with market actors) that our delivery of a standard specifically targeted towards small-scale fisheries, aligned with relevant global benchmarks and evaluated by independent third-party auditing can provide the credibility required in the market place. Our trials to date, utilising a guided self-assessment protocol for clients, and remote CAB audits, strongly indicate very significant cost savings over more established certification schemes. The imperative of keeping costs as low as possible will now be firmly embedded in Community Catch's development ethos.

2. To improve accessibility and reduce costs, we plan to provide a free-to-use guided self-assessment to enable fishery clients to provide information on their fishing operations (together with verifiable evidence). This will then form the basis of the independent evaluation against the Community Catch standard. How appropriate do you think having a self-assessment will be in increasing accessibility and affordability?



Response No.	Comments
1	I think a free-to-use self-assessment will provide the potential client with an opportunity to understand basic requirements, the information required of them, what they will need to comply with, and how, which will help reduce time and effort, and therefore cost, helping to streamline the process of evaluation preliminary to final assessment. I think it is important that it is stated what 'verifiable evidence' is required and examples given so as to manage expectations. I think it might also be necessary to have additional resources available if requested including opportunity to speak to a person to answer any questions. These could however be anticipated by including a FAQ.
2	This can provide a good foundation for the fishery evaluation. However, there needs to be clear instructions and support available (chat/hotline/etc?) when there is a lack of understanding. The process should include some amount of verification of the self assessment from desktop studies, randomized crew interviews or a mix of the two.
3	A free-to-use guided self-assessment is a good initiative as long as fisheries have the

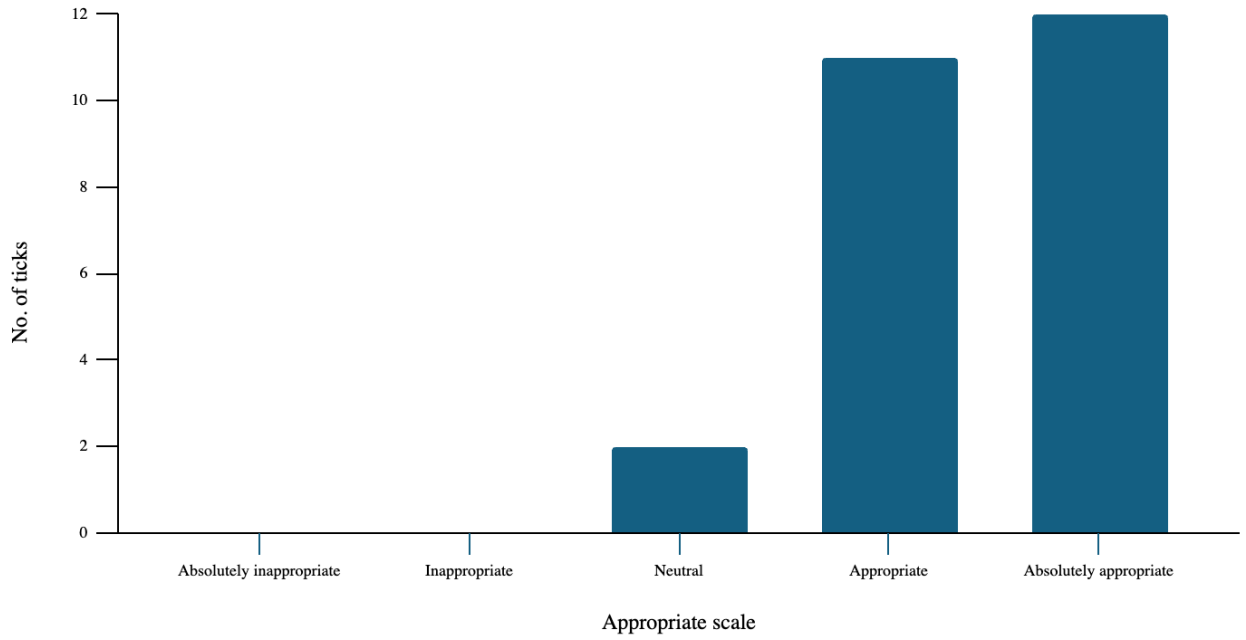
	capabilities to follow the guide and incentives to develop it. Artisanal fisheries are usually busy solving other social and economic problems, so if there is no incentive to address an environmental challenge, they are unlikely to invest time in it.
4	This is a fundamental part and will allow costs to be limited to the time taken by the client to complete the self-assessment and provide evidence
5	In the small-scale fisheries context, this feels very appropriate. The more the definition of small-scale is expanded to allow for hired labor, the less appropriate and higher risk this approach feels. We are interested to see the degree to which this approach actually lowers the cost of certification.
6	Not sure about this step as it will depend on the type of evidence attached to this self-assessment. We have similar experience from clients entering full assessment with MSC. They need to complete a Client document checklist for the CAB to be able to assess the fishery. Some of these documents are filled out in a very thorough manner but some other are almost blank, therefore, making the assessing process very complex. I guess this could have similar outcome. Other questions that raises are that it is not clear how the outcome of the self-assessment is determined. Would it be automatically scored by a software? Is it going to be scored by Community Catch staff or by independent experts? It has to be taken into consideration that the results of a self-assessment could vary from those reached later by a third-party organisation, thus there should be an outreach area in community catch engaged on explaining this kind of risks to clients.
7	If we client is the normal fish commercial person will be complex. In case there is a organization behind will be more appropriate However I believe anyone can find a time to do the self-assessment.
8	I think this makes sense with accessibility in mind
9	I think it will depend a lot on the structure and content of the self-assessment. It has the potential to streamline the assessment process considerably if accurate and relevant information is laid out for the CAB; however, if it leads to back-and-forth discussions or requests for clarification, there is a risk that cost savings could be lost. Ideally the self-assessment platform should be developed with the support of the CABs themselves, and should also be reviewed and updated as evaluations are completed.
10	As long as the SAQ is not too onerous a task for the fishers to answer, or they can be answered on behalf of the fisher.
11	Self-assessment sounds like a good idea until fishers see how complicated the required info is, and then they need to turn to an expert for help anyways. They (or someone) will have to pay this expert for their services, so will this really be less expensive than just paying a third-party to do the assessment in the first place?
12	I suggest that also in the self-assessment the fishery decide what metrics they will use to measure elements of the standard that can be tracked on an ongoing basis e.g. Participatory Management = Indicator: number of fishery management meetings

	held/year; Indicator: number of people attended Biodiversity/Threatened species = Indicator: number of threatened species caught per year; Indicator: % application of a specified mitigation measure across the fleet This will make follow-up audits very quick – as auditors just need to look at progress against the defined metrics.
13	There are complexity and many exceptions in the real world of fisheries. If you create such a guide, that will be a large volume, similar to MSC's "capacity Building toolkit". https://www.msc.org/docs/default-source/default-document-library/for-business/msc-capacity-building-guide-v3-digital-2023.pdf?sfvrsn=560e1409_13 The toolkit is designed for locally working people to self-evaluate their fishery, but it's still overwhelming for most of local people.
14	We have seen a similar process with other sectors that are a combo of SAQs and surveys and it can work quite well. CI implements a community FIP model in the context of SSFs and assessments are co-led by local NGO staff and communities.
15	Self-assessments provide insights into readiness and prepare CC for certification, minimizing the burden to onsite auditors. We recommend integration with catch logging (like Deckhand) and traceability (like Wholechain) apps to be able to receive data directly from sources and provide more passive / true inputs. Integration with SFP / FAO Fisheries IDs is also worth consideration to standardize references to sources for harmonized reporting across reciprocal entities like GSSI, SSCI and/or data collection for reports like SOFIA.
16	Self-assessments can certainly help increase accessibility and engagement; these can also increase overall efficiency for fishers, clients, and CC, since self-assessments provides a snapshot of readiness for full evaluation for a low-investment of time & money. It seems logical to offer this option followed by more independent verification methods. One question I have, how much assistance will be provided by CC with this self-assessment (4.2 in Evaluation Process), and how will they be funded to provide this assistance?
17	It might be affordable, but it's not credible without staunch evaluation and ongoing monitoring. This does not seem like a valid approach to credible certification. There is not enough information what represents "verifiable evidence".
18	Verifiable evidence sounds tricky. But I guess there might be some good ideas. Blockchain type of traceability might help.
19	This assessment should be explained to fishers and guidance should be given to them on how to fill it out as needed. Who has access to the information that comes from the self-assessment?
20	At the early stage support from NGO/CSO may be needed for capacity building and community organising.
21	Globally, there is a transition to greater transparency and so ensuring the

	self-assessments are publicly available can potentially be more/equally valuable as third-party assessments with a lower cost to the fishery.
22	Globally, there is a transition to greater transparency and so ensuring the self-assessments are publicly available can potentially be more/equally valuable as third-party assessments with a lower cost to the fishery.
23	Feedback from a trial run of the SA at jakarta workshop: “Language is lengthy and very complicated” “Overall I’m excited!” “Local languages are 100% required” “Community Catch can support this process through tailored capacity building for SSFs” “Not feasible for individual fishers, its meant to be a community effort” “It will be very difficult for the community to gather the MOV themselves” “Assistance for SSFs will be required!”
24	All photos/pictures added as MOV will need to be date and time stamped to ensure validity
25	Language requires simplification
26	M.O.V will be very hard to collect- especially for community based clients
27	Community based clients will need a lot of support- support infrastructure is key

Question 2 Conclusions
Most responses were favourable towards the self-assessment approach and this ties-in well with issues of minimising costs. From our trials, it seems a task of around 5 days to collect all the information required for the self-assessment. Of course, this is a significant task, but to maintain credibility, this cannot be avoided. Use of consultants or dedicated administrators may be necessary for many fisheries, but these may certainly be local consultants, NGOs etc. Costs savings on overall auditing requirements are such that this is still considered an economically viable proposition. We continue to develop guidance to accompany the self-assessment; this will be available on the Community Catch Digital Platform.

3. Many small-scale fisheries have limited data and often have management approaches based on fisher or community level management. To ensure that these fisheries can most easily access Community Catch, we consider the widest possible use of risk-assessments to be essential in applying our standard. How appropriate do you think the use of risk-assessments will be in evaluating small-scale fisheries?



Graph 1: Depicting the responses from the consultation period, against the appropriate scale for the Community Catch standard.

Table 1: Consultation responses linked to explaining the appropriate choices depicted in Graph 1.

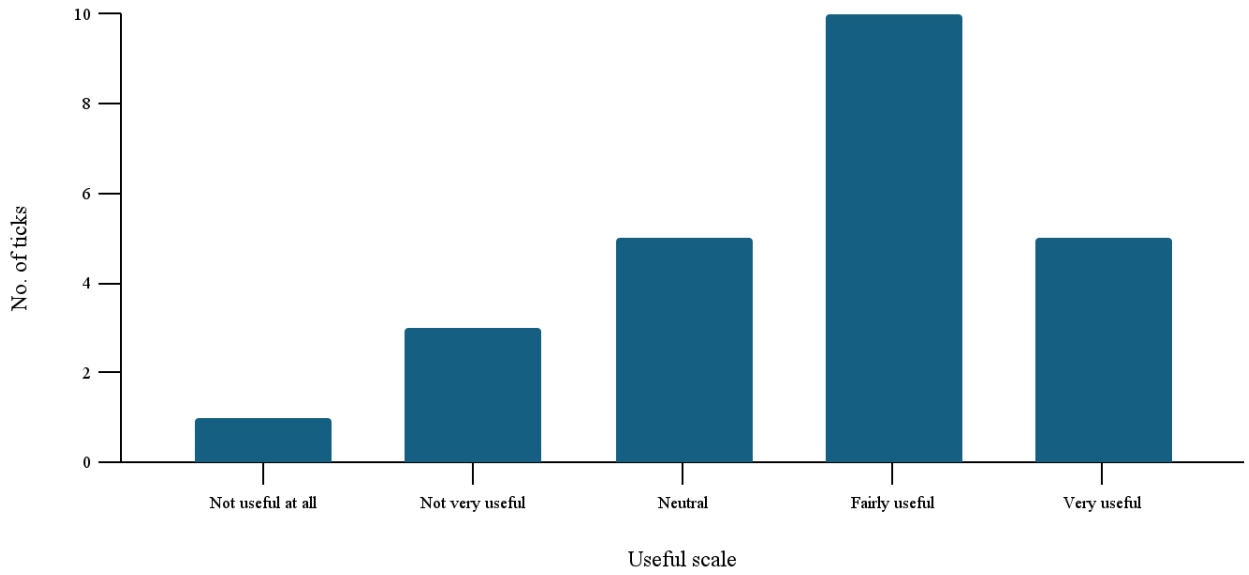
Response No.	Comments
1	Lack of data and formal stock assessment e.g. ICES model in Northeast Atlantic is typically a barrier to many small-scale fisheries. For example, many fisheries in Southwest England do not have a stock assessment. A criticism of the MSC, for example, is the barriers to entry for small scale fisheries. Some ratings programmes, including MCS ratings, can also become a barrier to market due to limited data. My PhD stakeholder interviews revealed volume and scale of fisheries, including the cost of certification, for small-scale fishermen, data deficiency, and lack of stock assessment, as barriers to fisheries being recognised as sustainable and them accessing sustainable seafood markets.
2	The nature of small-scale fisheries is that they happen on a small scale! It is absolutely appropriate to base the standard on risk determined from established and accepted

	risk assessment procedures.
3	The problem with risk assessments is that they generally use a precautionary approach that ends up negatively impacting the economies and livelihoods of artisanal fishermen. Risk assessments must include social and economic aspects to find a balance between conservation and poverty reduction objectives.
4	The use of risk assessments are appropriate in the absence of data however guides to how to better access data should be provided by CC to enable fishery clients to have the most knowledge of their fishery and identify any gaps or challenges which require action
5	Generally speaking, we support that approach in this type of fishery, in particular with regards to environment and resource management that relies on data that can be deficient in data. There's a lot of benefit here for SSFs in conducting risk assessments because it can show them areas that need more attention and eventually a roadmap for how they can address/mitigate their risks and funnel their resources appropriately.
6	Based on our experience applying other Standards and to support the creditability of the community catch a precautionary basis has to be applied to assess data-poor fisheries. In that regard, a risk-assessment provides with confidence.
7	The fishermen need to understand the risk-assessment
8	I think appropriate so long as there is some guidance on what the risk assessment needs / has to cover
9	Should go further than a standard risk assessment and be algorithmically powered and predictive
10	Risk assessment is a good place to start, but does not warrant the same market recognition as verification of reality.
11	I couldn't see details on how these risk assessments will work in practice.
12	I agree that most small scale fisheries have limited data.
13	The level of quality / usefulness will very much depend on the design and use of these risk-assessments. In praxis, risk-assessments are often flawed in favour of development/extraction of natural resources and, consequently, biased towards approval of the planned operation/project. Risk-assessments should be objective an take a 'precautionary approach' in the sense of the Rio Declaration.
14	We believe they are appropriate for both the social and environmental components here for the SSF context.
15	Risk and opportunity are the balance to investment and certification is an investment. There is an argument to be made to assess the riskiest fisheries to encourage transition to just and sustainable practices.
16	They are appropriate ONLY if accompanied by some system of verification that does

	not rely on self-reporting.
17	Not 100% I understand what the criteria would be here (or what you mean by "the widest possible use of risk assessments to be essential in applying our standard" tbh). I guess when there is high uncertainty and risk, one can try to build a methodology to increase data within the participant members throughout the process, and protocols and criteria on how to advance from whatever info is raised.
18	At the early stage support from NGO/CSO may be needed for capacity building and community organising. Ensure gender and social inclusion for meaningful participation.
19	Whilst risk assessments will certainly reduce the cost and have value in encouraging participation so that the task is not so daunting. However, there are inherent assumptions that come with risk assessments that are risks in and of themselves and so it depends on the risk assessment itself in order to comment on this appropriately.

Question 3 Conclusions
The overall consensus is that risk-assessment based evaluations are appropriate and useful in many/most small-scale fishery situations. The issue of precaution is raised, but it has been well established that many risk-assessment methodologies (such as PSA) are over-precautionary. We will at least make allowances for suitable risk-assessments when we launch Community Catch, and developing these will be a major focus for our early development.

4. Determining labour and health & safety conditions on small-scale vessels is always extremely difficult. As part of our risk-based process, we are exploring the use of targeted mobile phone-based surveys to ask fishers directly about their working conditions. The answers gathered would help to identify potentially higher-risk situations. How useful do you think these fisher surveys will be?



Response No.	Comments
1	I think there is a risk the fishers themselves could be coerced into providing information on their working conditions that do not accurately reflect the conditions they are actually working in. On the other hand individuals may use mobile phone interviews a an opportunity to air personal grievances of little value to an objective determination of labour, health and safety conditions. I think mobile phone-based surveys would need to be more used in conjunction with spot checks of vessels before or after a fishing trip to assess labour, health and safety conditions more fully. The availability of lifejackets/vest for example and compliance with international standards such as ILO and SOLAS conventions would be immediately obvious on inspection whereas if asked an individual can say he or she has a lifejacket and that there are life rafts on board etc. when in fact there are insufficient or none. How well-run, working conditions, and how safe a vessel is can more accurately be determined from a targeted inspection, e.g. inspection of storerooms and galley for provision of clean, safe, potable water, adequate food; inspection of wheelhouse/interview with skipper for compliance with basic safety and health requirements; deck for cleanliness, safety, storage of equipment etc.; inspection of accommodation, cabins/sleeping and washing facilities to check they are adequate and

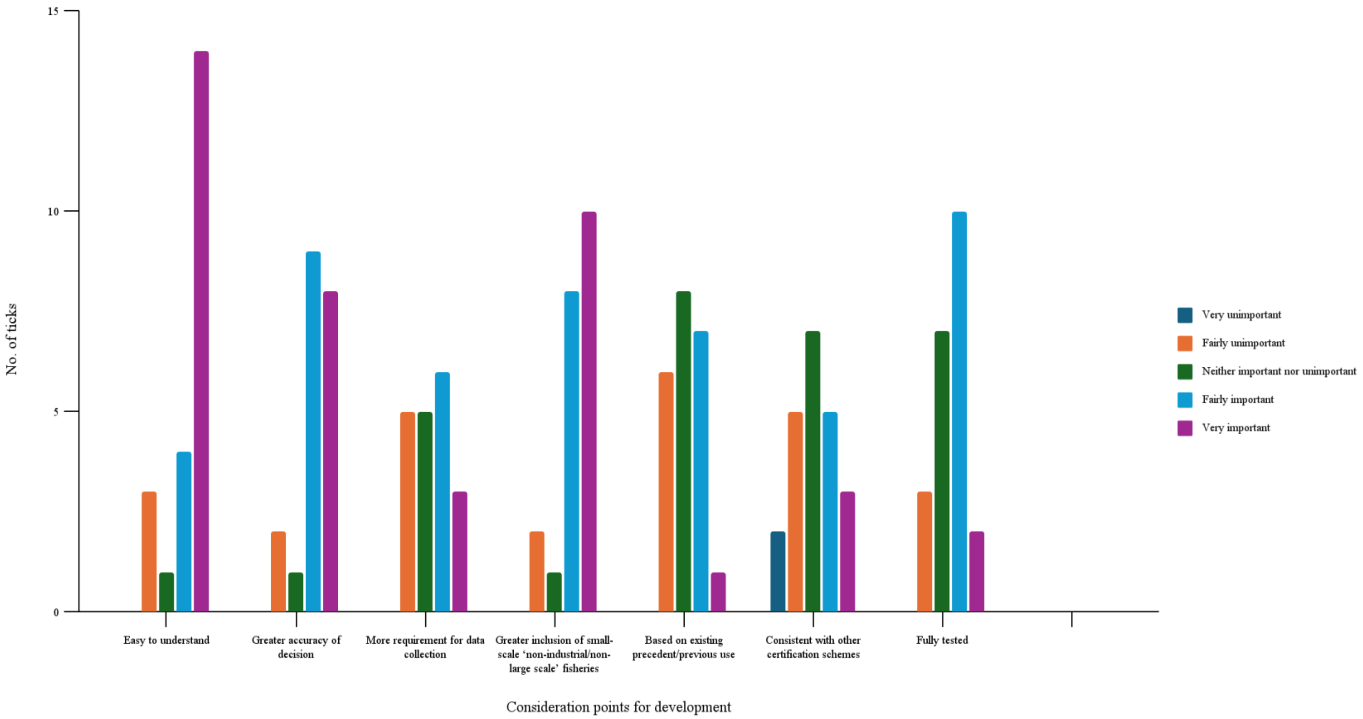
	hygienic etc. In relation to working hours, inhumane treatment, child labour, wages, documented evidence such as crew lists, pay slips would likely need to be provided and records maintained to provide assurance. Where there are fisheries with little mechanisation and taking place close to shore targeted mobile phone-based surveys with fishers about their working conditions may be adequate. The fishery will likely be more easily observed, including by those not directly involved, enabling verification to be obtained from casual by-standers, observations made by family members etc. Transparency and knowledge of how fishers live, and work could also be assessed and communicated by CC to consumers via a portal/platform/website pages dedicated to 'meeting the fishers'. For examples, see Cornwall Good Seafood Guide https://www.cornwallgoodseafoodguide.org.uk/fisherman.php ; South West Handline Fishermen's Association https://www.linecaught.org.uk/; and Discover Seafood https://discoverseafood.uk/category/the-faces-of-fishing/
2	Some concern that surveys will not be understood or taken seriously enough to yield useful results, but seems likely that at least a portion will be helpful in assessing social issues.
3	For this tool to be helpful, it should be easy to access and use. Many artisanal fishermen do not know how to read or write and do not know how to use mobile phones for these purposes.
4	This is essential to be able to access fishers directly and privately and seek their direct, unadulterated opinion
5	How risk assessments and a risk-based process is being integrated into your initiative is not clear to us from the Standard and Evaluation Process documents. Targeted mobile phone-based surveys can provide meaningful results, but must be carefully designed and administered, and ideally accompanied by other activities to support fisher empowerment and engagement.
6	We are all aware of some working conditions in different countries around the world. I personally have the experience of working offshore for more than 10 years with fishermen, and I can assure you that if you ask a fishermen these type of questions in front of their master or superior, they wont answered honestly as they would be afraid of loosing their jobs.
7	Question. Are their home in a good health & safety condition? I believe it is needed an integrated analysis from their home/ Community to the boat
8	These surveys have the potential to be very useful, however there are important considerations to take into mind before rolling them out – such as languages used; the context given before surveys are completed; the conditions in which the surveys are completed in. For these to be at all useful, there has to be trust in the system and an understanding of what the answers are to be used for.
9	I think this depends on the specific nature of the surveys, and in particular on how the phone numbers are sourced. But direct contact with fishers is the only realistic way to

	assess the Target Requirements of Sections L and H, and without a site visit phone surveys are a potential solution.
10	Assuming mobile numbers are available, and there is reasonable reception.
11	I have no expertise on this, thus decline to answer
12	It might also be good to team up with a local NGO that can spend individual time with the fishers, build up trust and get to understand these issues.
13	I don't think fishermen answer honestly.
14	Again, the usefulness will very much depend on the design. In principle, to make use of the broad availability of mobile phones seems to be a good idea.
15	A very good input to data collection for labor and H&S, but should then be validated via triangulation from other sources, and there should be a process in place to act on findings uncovered through the mobile data (getting onsite and evaluating and providing effective remediation).
16	Recommend consideration to leverage worker voice applications like Ulula as a part of a holistic technology stack for "modernization" of certification. As new certification, CC could set a new precedent for modernization and progression in the sustainable seafood movement by integrating certification with technology.
17	Useful but potentially risky. How would the collected information be used? Would these details be part of the self-evaluation? If conditions are reported bad, how would the program prevent potential negative repercussions against the fishers/workers? How will data and identities be safeguarded? Photo documentation may be a potential solution, but it also has the potential for manipulation.
18	These surveys will not be useful unless there is a clear process with a legitimate voice for workers to address problems. Otherwise there will be a bias to not report problems because information may be shared with employers or others who seek retribution. It must be answered by those without an incentive to hide problems, like a union.
19	I wonder about the availability or willingness from fishers to disclose harsh conditions. It would vary of course depending on the countries, cultures, fisheries, social and power dynamics, etc. Tricky. But def better than nothing. Good to have standards and criteria. I just wonder how the data gathering process would take place. Some useful information can be taken by a single visit (to get a general idea of the conditions), but a lot will be hard to assess. Having partner organisations or individuals on the ground (or the country) might prove helpful.
20	Ensure SSF access to mobile phone and an internet available as well as available money for the mobile used./as well as capacity building to have ability for using e mobile .

Question 4 Conclusions

There is a mixed view among consultees as to the usefulness of targeted mobile phone-based surveys to ask fishers directly about their working conditions. A small majority feel this to be fairly or very useful. Testing of such a survey with some of our trial fisheries has, however, shown some very promising results.
Our intention then is to continue to develop this as an option available to Fishery Clients, and refine this further as we gain more experience.

5. Community Catch has developed using a definition of 'small-scale' fishers primarily as those using vessels less than 24m in length (or no vessels) – as a proxy for 'small-scale' versus 'large-scale/industrial' fisheries. This aligns with, for example, ILO conventions which have very different requirements for vessels less than, or more than, 24m. This is a very important consideration for us. What issues do you think we need to consider in developing this definition?



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Response No.	Comments
1	I think the matrix approach is a very good one, visual, easy to understand, obtain an overview of how vessels qualify. Vessels that are equal to 24m or more do not appear to be accommodated? Important that definition is clear, easy to implement, unequivocal and there is no potential for exploiting rules to gain unfair advantage or mislead consumers. I think it is important to consider all relevant Government and International standards. For example, the UK Government requirements and construction standards for fishing vessels are considered in terms of vessels under 15m, 15-24m, and over 24m. For consideration of, for example, fishing trip duration, compatibility with these and other requirements will need to be reflected in the matrix construction. Pollution, waste disposal, lost gear, facilities and procedures for dealing with waste, preventing pollution. Incorporated in fishing gear and mechanisation - Climate impacts of vessel – e.g. energy

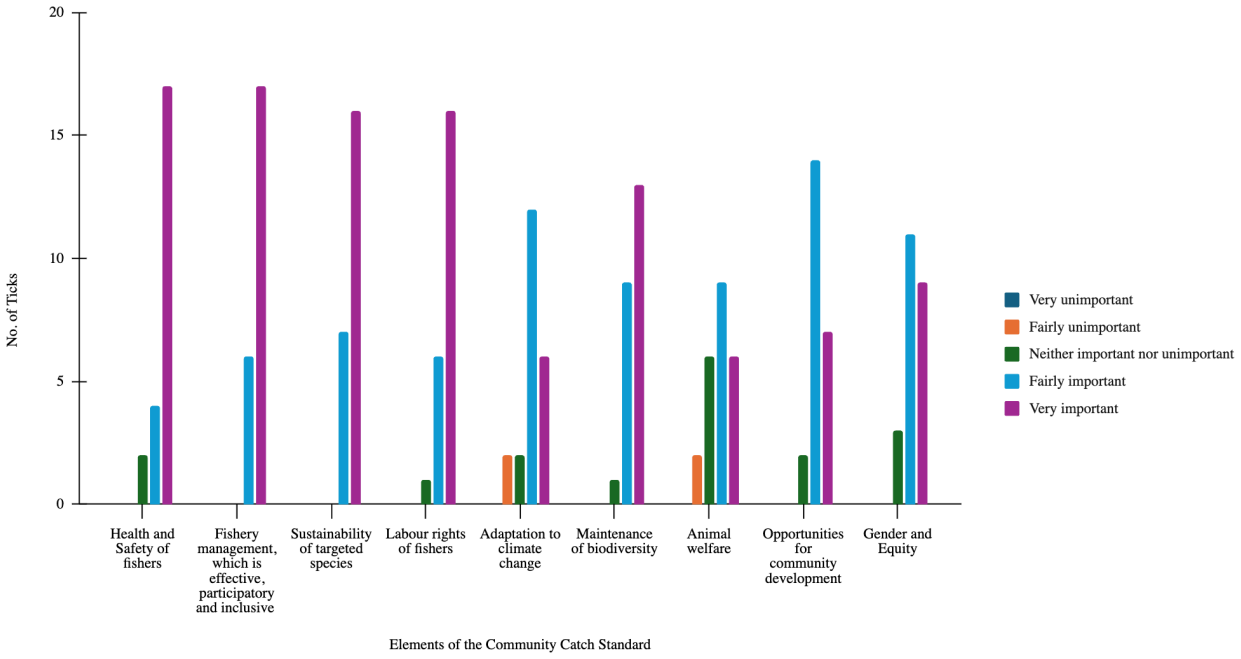
	and fuel consumption, GHG emissions from processing, transport and distribution, bait fishing. Incorporated in fishing gear and mechanisation - Ecosystem impacts of vessel e.g. bycatch; seabed and biodiversity impacts. Incorporated in Labour/crew and ownership - Income and dependency of jobs ashore, family, contribution to local community or community-ties. Incorporation of use of equipment such as sonar, fish finding devices, support vessels, on board processing, more typical of industrialised fisheries. Business model and current access to markets e.g. Community-Supported Fisheries (CSF) model.
2	This question is difficult to parse. Is the above table of importance the same as the matrix of factors?
3	I agree a matrix type approach is the correct approach. I think it is important to model some example fisheries we already believe are SSF and some which we believe are not in this matrix to check what the maximum scoring should be Also, on metric for Motorisation need to include a larger outboard motor option as some small boats use bery high powered outboards for speed and conditions – e.g. 250hp
4	Ultimately, it is essential for the standard and evaluation process to be fit for purpose for the definition of "small-scale" that you land on. We like the nuance that the matrix approach provides, but would want to ensure that the cut-off point is not too high (the 20 listed in your example document seems too high, though we would want to run scenarios to confirm that perspective). We also think the matrix would need to be, as you suggested, accompanied by some rules– some additional rules to consider could be: land-based (no vessel) fisheries are always eligible; any vessel with a crew >X# is never eligible; any vessel with fishing trips longer than Y days is not eligible.
5	I found the draft Community Catch Matrix very interesting. I think it includes 8 relevant topics for assessors to be able to classify type of fisheries in a very straight forward manner.
6	We need to understand that the current the so-called industrial fishing is an evolution of the artisanal fisheries. Due to we need to consider that fisheries will also evolve in technology if that equipment or machinery is useful. The impact of GPS and Cell phone technologies has changed the strategy to fish, in some parts of the world is faster than others. But will impact in the "artisanal" fisheries. I suggest to include in the IHH an extra factor digital technology, considering the level of interaction with the future client (i.e., e-market).
7	The suggested 24 points out of 28 seems quite high, and could allow in larger scale/industrial operators?
8	I like the proposed matrix approach far better than a simple vessel length determination. I think the accuracy of the end result is most important, and data collection/ease of understanding is not as important – this is merely a first screening effort to determine if a fishery is eligible. If they are, they will have a lot more complex

	things to understand and a huge amount of data to collect.
9	Small-scale fisheries can vary significantly across regions due to differences in ecosystems, cultural practices, and economic conditions. It's important to ensure the definition is flexible enough to account for these variations, allowing for region-specific adaptations. Engaging with various stakeholders, including fishers, community leaders, and NGOs can help gather diverse perspectives and ensure the definition reflects the realities of those directly involved in small-scale fisheries.
10	Yes, this will be the challenge to make sure larger better-funded fisheries do not dominate.
11	A matrix solution seems much more appropriate than a 'fix rule' solely on vessel length. It is also very important to follow the observation by IHH that the definition of SSF depends very much on the local context and is not universal across the whole planet. Something for you to consider.
12	Would maybe want to add a factor relating to local / country-specific criteria for defining SSF.
13	These feel like binary decisions with only "fully tested" being indifferent. Ease, accuracy, data collection requirements and inclusion are the gaps in current certification; therefore, these seem very important. Given current approaches have proven to be not fit for purpose, current precents / consistency with them feels irrelevant: why model against current schemes when their shortcomings inspired CC to be created?
14	Suppose the standard evaluates a fishery at the "fishery" level or fishery group. In that case, the total number of vessels participating in the fishery or fishery group and scale of harvest should be considered. Many fisheries have small-sized vessels participating, but taken in aggregate, the impact and the volume harvested may lend itself to being considered more large-scale or industrial in nature. An example of this is Alaska's sockeye salmon fishery in Bristol Bay, which involves small (less than 10m) vessels that are primarily owner-operated, taking short trips with small crew. However, several thousands of these vessels participate in the fishery, harvesting an average of 40 million fish in a season. A matrixed methodology such as the one that Community Catch outlines, but that considers total vessel participation and harvest volume, may better help delineate a "small-scale" fishery or fisher group.
15	Being clear and easy to assess is most important. Stay away from anything involving difficult to measure indicators like tonnage or horsepower. Any informed observer should be able to quickly assess if a vessel qualifies.
16	Length by itself can be tricky. The FAO methodology might be more appropriate, although a little more complicated. Maybe generate 2 or 3 tiers or subcategories and, down the line, see if some differentiated criteria might be necessary for working with each subgroup. (In Chile small-scale is under 18m, but several vessels have HUGE capacity (of fishing and of impacting ecosystems) between 15-18m).
17	Meaningful Participation of SSF in the development of community catch guild line/ ensure women fishers participation in the development process. Definetion of SSF in

	Thailand
18	Whilst the matrix approach considers the complexity of SSF and is the preferred approach, I was not able to understand what was meant by categories 2-4 and so was not able to answer fully. Consistency with other schemes is not entirely relevant as CC should be able to stand on its own and it is filling an existing gap.

Question 5 Conclusions
There was a general feeling among consultees that the matrix approach offers better resolution than a simple length-based approach. We have accepted this and developed and tested the matrix approach further. As far as possible, we have made this straightforward and easy to understand; we have also determined that vessels using labour intensive or passive gear, with vessels less than 24m, would automatically qualify (use of the matrix would therefore be for mobile gear and/or Fisher Groups with vessels over 24m). The cut-off for small-scale vessels would be at a matrix score of 21 or more, ensuring accessibility to the full range of small-scale fisheries. We have avoided adding further criteria such as 'harvested volume' as this risks being prejudicial against fishers who are definitely small-scale; the Community Catch standard separately addresses issues such as management of targeted stocks.

6. How important do you consider the different elements of the Community Catch standard to be?



Response No.	Comments
1	I think it is a very good initiative considering barriers for small-scale fishers accessing existing certification schemes; lack of agreement on and understanding of seafood sustainability; and current exclusion of social and ethical dimensions, such as animal welfare, and climate change when assessing seafood, considerations/attributes which are becoming of increasing interest to consumers, both stakeholders, especially retailers and producers, and the general public, at least in countries with developed economies such as UK/EU and USA.
2	I believe equity is important however gender in the small-scale fishing community is dependent on location so we have no opinion on this. I believe animal welfare is coming to the fore more now and will continue to be relevant in future years. I think climate change and carbon footprint of wild fisheries is in the more distant future so can be addressed in future versions of the standard
3	All issues that are aimed to be gathered within the community catch standard are important. However, as it seems to consider not just the environmental but also the social scope of fisheries, what would be the qualification of auditors required? In order to be cost effective for small scale clients, assessment teams should not be large, and

	the qualification should not be expensive and time consuming for the certification body as it could impair profitability.
4	Labor rights of fishers must be prioritized. A crucial aspect is improving both general and digital literacy within fishing communities. Without adequate development in these areas, there is a risk that these communities will be exploited, reducing fishers to mere tools rather than recognizing them as essential contributors to global food security.
5	Our approach to this review was from the perspective of what we would say to our partners/SR participants/fishery stakeholders if the Community Catch standard goes forward as currently written, and our review primarily focused on the environmental portions of the standard. It appears that the CC standard does cover the most important aspects of environmental sustainability, but more shallowly than other certification standards. It is also far less prescriptive on environmental sustainability issues than other standards like MSC or RFM, which could be an advantage to small-scale fisheries. We do have a few suggestions for specific environmental performance indicators, which are included below in Section 4. It appears likely that Community Catch Certification will likely ensure basic management is in place, but will not be a strong guarantee of environmental sustainability. At this point we believe a Community Catch certified fishery will be on par with FishSource scores of >6 out of 10 (which we interpret as "Reasonably Managed Fisheries"; we reserve the term "Very Well Managed Fisheries" for those where all scores exceed 8 out of 10), but we won't know for certain until we see how assessors apply the standard since it is not very detailed or prescriptive. SFP's advice to buyers will initially rest upon whether the Community Catch standard attains GSSI benchmarking. If so, many buyers will accept the certification as complying with their sustainability policy and we will help them monitor the status of CC certified fisheries. Our likely advice to buyers will be: A Community Catch certified fishery is far better off than most small-scale fisheries around the world at this point in time, and is a very significant step along the path to sustainability. But it is also not a replacement for long-term engagement of supply chains in sustainability. Buyers should reward fisheries that do achieve CC certification, but should more deeply engage with those fisheries to ensure good long-term science and management.
6	Adopting a holistic approach that addresses biodiversity, climate change, and animal welfare in small-scale fisheries can lead to significant benefits, including enhanced working conditions. By minimizing stress in caught animals, we can lower mortality rates, improve product quality, and extend shelf life, all of which contribute to higher income for fishers.
7	I am not sure how it is possible to measure adaptation to climate change – but these issues could be addressed within community development. It doesn't seem fair to require action on something out of fishers control (i.e. something they are not directly impacting unlike fish stocks) and will require finance. Animal welfare – just not something I know much about in terms of what techniques are available to make it more humane and whether they are practical.
8	We believe the target should be focused on sustainable fishing practices understanding

	that the community may not have full control over the sustainability outcomes of the stock. The communities should see benefits for using these practices and the standard should focus on factors within the sphere of influence of the community. We are aligned with the animal welfare approach in the draft version.
9	All of the elements are very important, but I posted those as "fairly important" that are less in control of the small-scale fishers given wild fishery context. For example, gear can impact "animal welfare" but the lifecycle of the species is not in control of the producer like aquaculture. Animal Welfare seems more relevant for small scale aquaculture.
10	As possible, providing cost information about evaluation and certification would provide greater transparency for decision-making.
11	The over-reliance on self-assessment without credible evaluation is a major problem for the credibility of the program. This conceivably covers much more topics than even MSC and yet has no real checks. It also is very vague or underdeveloped in areas like worker voice and animal welfare among others. The connection of the fishery group to the unit of evaluation is also very weak without a clear need to include a notable percentage of fishers.
12	I wonder whether the tool will be to assess whole fisheries, or maybe specific communities, or subregions? What will be the criteria around trading seafood that is well managed by a specific community/group BUT considered overexploited in general? (Always a tough question, at least for me).
13	How do you become an accredited CAB? Is there an option to work with the CAB as an independent third party data collector, or do you need to become accredited?
14	In addition to above element, the customary rights of the SSF communities and governance of fishery and ecosystem based coastal resource management needed to be considered as well.
15	Fisher safety is a really key issue in small-scale global south fisheries and often overlooked by the governments and the supply chains. This needs to be core and well managed.

Question 6 Conclusions
Health and Safety of Fishers and Effective Fishery Management were identified as the most important elements of the standard, closely followed by Sustainability of Targeted stocks and Labour Rights of fishers. Some way behind these was Maintenance of Biodiversity. These five areas, all ranked as 'Very Important', form the main part of the Community Catch standard and are the areas in which specific levels of performance are required. The consultation has therefore confirmed our view that these elements are of primary importance.

Adaptation to Climate Change, Animal Welfare and Opportunities for Community Development are predominantly ranked as Fairly or Very Important. These are predominantly represented in our standard as issues for which we require reporting of the situation within the fishery, but do not require specific levels of performance. This approach seems in keeping with consultee views. Gender and Equity is probably the highest ranked of these 'Secondary' areas. This is represented by requirements throughout other sections (Labour and Health and Safety and also Community Development) – some requiring specific levels of performance, other only reporting.

Overall, we are pleased to see that our internal ranking of issues of importance aligns with that of the majority of consultees. We will continue to develop the standard to reflect this prioritisation.