



MAKE STEWARDSHIP COUNT

Rupert Howes and Giles Bolton
Marine Stewardship Council
Marine House
1 Snow Hill
London EC1A 2DH

Re: Delayed implementation of the MSC Fisheries Standard V3.0

Dear Mr. Howes and Mr. Bolton,

The Make Stewardship Count coalition, representing more than 90 marine conservation experts, organizations, and researchers from around the world, writes to convey our deep disappointment in the decision to delay the implementation of the MSC Fisheries Standard V3.0.

Our members have extensive expertise in a wide range of fisheries issues and have spent a considerable amount of time engaged with the MSC Fisheries Standard Review (FSR) since 2018. As highly engaged stakeholders we are concerned with the decision of the MSC to delay the implementation of the revised Standard. We are especially concerned that this delay was only announced by placing a brief notice on the MSC website, without a media release or direct updates to stakeholders prior to the announcement on the website. This further reinforces the concerns we have raised previously regarding the lack of transparency and insufficient stakeholder engagement from the MSC.

This derogation seriously undermines the credibility of the MSC program and its stated intent to drive actual change on the water. With fisheries that are new to the program now having until 2026 before being assessed against version 3.0, and certified fisheries having until 2030, there will essentially have been over a 16 year lag in practical improvement in the certification requirements since the release of V2.0 in October 2014. In this time, fisheries management has moved forward on a global scale, while MSC is still content with the fisheries in their program fulfilling the same old standard requirements, many of them already having been behind the crest of the wave back in 2014.

By delaying the mandatory use of the new Standard 3.0 for 2 more years or more, this allows fisheries to continue using the previous Standard. The MSC has indeed lowered the bar, which raises questions as to whether the goal of the program is to create change, or to retain fisheries. Many fisheries have taken advantage of this opportunity to fall back to the previous requirements. All the while, those fisheries that already exceed these requirements, and are truly "ahead of the crest of the wave of sustainability", are provided no differentiation in the marketplace.



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The Standard V3.0 as initially envisioned still fell short of meeting what we would expect from the world's leading seafood ecolabel, but addressed at least some longtime overdue shortcomings of the MSC programme, such as a fins naturally attached requirement without exceptions.

Over the course of the review, and in particular during the final opportunity for comment, we highlighted several areas requiring additional clarity, as well as concerns around the Evidence Requirements Framework (ERF), the two main drivers of this derogation. We urge the MSC to:

- Require implementation of the new Standard six months after the release of the planned update in July 2024.
- Aim to undertake this review of the ERF within the same time frame and to begin implementation immediately when the review is complete.
- Provide a formal, meaningful opportunity for stakeholders to provide feedback on the ERF review and draft changes.
- Provide stakeholders with regular updates including a timeline for the expected completion of these changes.

We look forward to your response addressing our collective concerns, and to receiving timely updates throughout the course of the review. We urge you to ensure that this process is transparent. Our coalition looks forward to the opportunity to provide input.

Sincerely,

The Steering Committee of Make Stewardship Count

Shannon Arnold, Cat Dorey, Kate O'Connell & Iris Ziegler

CC:

Alene Wilton, Chief Operating Officer, MSC

Rohan Currey, Chief Science and Standards Officer, MSC

Simon Cripps, Head of NGO Engagement, MSC