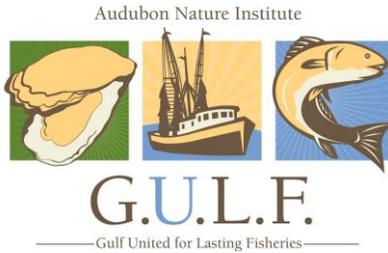


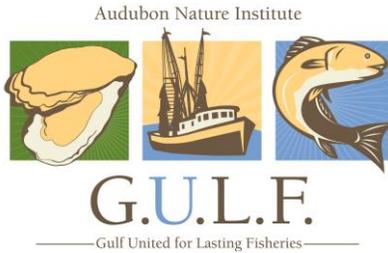
Audubon G.U.L.F. Public Comment Matrix for Period Ending February 15 2015

Section of the Standard	Standard Language	Organization Comments
Ownership		"Audubon should clearly state that it will conform with and demonstrate its own conformity to the elements of the FAO Guidelines that Apply to certification scheme owners."
		Standard ownership: "It is not clear whether or not Audubon has accepted all of [the obligations outlined in the Ecolabelling guidelines] and has in place policies and procedures that conform to all elements in the Guidelines. [...]In order to be fully transparent and ensure alignment with FAO guidelines, further clarity is needed regarding all major governance aspects of the scheme."
		"There is no available information that demonstrates that Audubon has undertaken steps to conform to 'Procedural and Institutional Elements of the FAO Guidelines', and it is not clear how and to what degree the full range of responsibilities of the scheme owner will be undertaken."
Foreward		"Do you intend for the standard to meet the Sustainability Consortium's principles?"



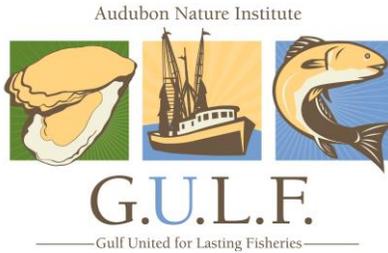
Audubon G.U.L.F. Public Comment Matrix for Period Ending February 15 2015

Section of the Standard	Standard Language	Organization Comments
Source documents	List of documents on pg.4 in Standard	"Audubon should conform with ISO 17067, WTO Code of Good Practice for Standard Setters, and ISEAL Codes of Good Practice for standards setting, impacts and assurance."
		Should include "ISO 59:1994 (Code of Good practice for Standardization, ISO 17067, ISEAL Code of good Practice 2012, ISEAL Assessing Impacts of Social and Env Standards 2013"
		Additional documents to be included: "FAO Guidelines for Bycatch Management", FAO Guidelines for Ecolabelling of Fish (2011), FAO Voluntary Guidelines for Securing Sustainable Small Scale Fisheries in the Context of Food Safety and Poverty Eradication (2014)"
		"The 1995 version of the Code is outdated."
		Should include "FAO Internation Guidelines for Management of Deep Sea Fisheries, Bycatch Management and Reduction of Discards (2011)"
Definitions		Defining the outcomes of the certification as "responsible" versus "sustainable."
	pg. 1...with the main objective being the biological sustainability of the "stock under consideration"	How do we define "'Effective, biological sustainability, consideration, due regard'"



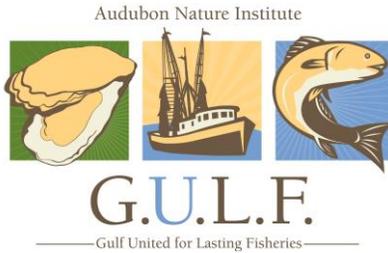
Audubon G.U.L.F. Public Comment Matrix for Period Ending February 15 2015

Section of the Standard	Standard Language	Organization Comments
Outcome Indicators	<p>Data review and analysis shall consider all fishery removals of the target stock(s) including retained catch and discards in target and non-target fisheries. (3.2)</p>	<p>"While the standard requires that management measures and appropriate monitoring be in place, actual implementation, effectiveness, and outcomes are not included." "The criteria must be modified and strengthened to ensure that no fishery that encounters an unhealthy target stock, bycatch/discarded/ETP species [...] can be deemed responsible or sustainable."</p>
	<p>In the event of overfishing, there shall be objectives for the management system to reduce fishing mortality to levels that have been identified as appropriate for high productivity and long term conservation. (4.2)</p>	<p>"It is unclear if [4.2] applies to fisheries that are experiencing overfishing before/during the certification process or is meant to be a contingency plan for certified fisheries that start to experience overfishing. A fishery experiencing overfishing should not be able to get a certification until overfishing has ended."</p>
		<p>"It would greatly strengthen the conformance criteria and improve transparency if outcome based indicators were developed for all components."</p>



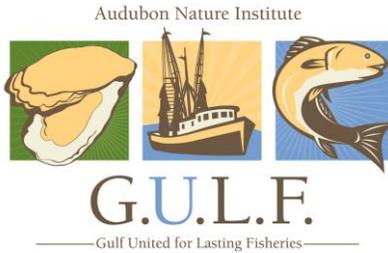
Audubon G.U.L.F. Public Comment Matrix for Period Ending February 15 2015

Section of the Standard	Standard Language	Organization Comments
Clauses 4.6-4.7	7.4	"To ensure that the standard recognizes fisheries are conducted in a sustainable manner, we believe that cumulative impacts on target species, non-target, endangered, threatened and protected species and marine habitats must be assessed."
Clause 7.4	7.4-7.5	"None of the indicators in the conformance criteria appear to ensure that the target stock and other impacted species are above biologically based limits and that the fishery does not disrupt the structure and function of encountered habitats or the ecosystem."
Precautionary Approach	Insufficient data and greater uncertainty of the state of the stock under consideration such that a higher level of precaution is required when defining harvest rates.	"We recommend that the precautionary approach to fisheries management (Section D) be applied to impacts on bycatch species, habitats and ecosystems in addition to the target stock."



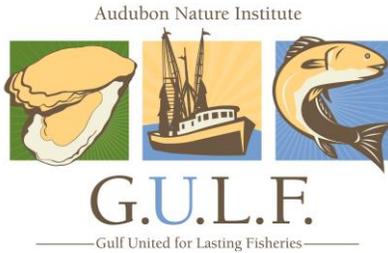
Audubon G.U.L.F. Public Comment Matrix for Period Ending February 15 2015

Section of the Standard	Standard Language	Organization Comments
Clause 3.8	<p>In the absence of specific information on the “stock under consideration,” generic evidence based on similar stocks can be used for fisheries with low risk. However, the greater the risk the more specific evidence is necessary to ascertain the sustainability of intensive fisheries. (FAO CCRF (1995) 7.5.2; FAO Eco (2009) 30.4)</p>	<p>"This appears to be an effort to provide opportunities for data-poor fisheries, but it could be twisted and used inappropriately if there is no further elaboration of "fisheries with low risk" and no requirements to obtain the lacking information within a specified timeframe."</p>
Clause 7.2	<p>In the absence of specific information on the ecosystem impacts of fishing, generic evidence based on similar fishery situations can be used for fisheries with low risk of severe adverse impact using a suitable risk management approach. (FAO CCRF (1995) 7.5.2; FAO Eco (2009) 31.4)</p>	<p>"How is 'low risk of severe adverse impact' determined? This criterion could be twisted and used inappropriately. Absence of specific information should be permitted temporarily only-- there should be a requirement to collect this specific information."</p>



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Section of the Standard	Standard Language	Organization Comments
<p>Clause 7.7</p>	<p>7.7</p>	<p>"This criterion is weaker and more vague than 7.5 and 7.6. One of the flaws is that it appears to focus on food web interactions and doesn't explain or elaborate on 'other ecosystem interactions' to the same extent. It also needs to better explain what must be done in the event that there are ecosystem problems caused by the fishery."</p>
<p>Consideration of Enhanced Fisheries</p>		<p>There is reference to enhanced fisheries in subsection E8 and its associated paragraphs. [...] They only address conservation concerns regarding fisheries enhancement. We recommend that Audubon includes the paragraph related to enhanced fisheries from Inland Guidelines."</p>



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Section of the Standard	Standard Language	Organization Comments
Comments Related to Guidance Documents		What are the thresholds for non-conformance to the standard? At what point does a fishery fail an assessment?"
		"In order to determine the standard's strength and what fisheries meet the standard, outcome metrics need to be delineated and scoring guidance provided."
		As a complement to outcome indicators, scoring guidance is necessary in order to determine which fisheries would meet the stand's requirements."
Other		State requirements: "Specifically refer to the actions of states..." "These criteria are not auditable as a certificate holder cannot be held accountable for regulations set by government or a regional fishery management org."
		"More information is needed about the TAC and the criteria review process. Notably, no one on the TAC appears to have any experience with fisheries standards or certification. In addition, committee members must not have conflicts of interest related to success of the program (i.e strong industry ties)"