



Saving Seafood Investigation: Ratings and Realities of U.S. “Sustainable Seafood”



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Background

A 2012 NPR poll¹ found that 80 percent of Americans who regularly eat fish say it is "important" or "very important" to them that the seafood they buy is sustainable. Yet when choosing between options in grocery stores or on dinner menus, most consumers have little prior knowledge or immediate information to help them differentiate between fisheries that harvest seafood sustainably and those that don't.

Some grocery stores and large retailers, including Whole Foods, Walmart, Target, and Costco,² have opted to guide consumers towards seafood options that they believe are most sustainable by banning seafood listed as “Red/Avoid” on the Monterey Bay Aquarium’s Seafood Watch Guide. Many also purchase only from fisheries certified “sustainable” by the Marine Stewardship Council (MSC), when available.

But should third party verifications be used as market barriers for U.S. seafood?

This investigation examines key issues with the most popular seafood guides and the obstacles they can create for U.S. seafood providers.

Executive Summary

Seafood guides and certification programs can be useful to both retailers and consumers when evaluating seafood sustainability. But when consumers and retailers rigidly follow third party ratings and certifications, serious problems emerge.

A vital aspect of sustainable fisheries management is market value. As demonstrated in this report, third party ratings and certifications can hamper sustainably sourced U.S. seafood from reaching consumers, which adversely impacts local economies and established conservation efforts.

Thorough, timely, and comprehensive science should not take a back seat to third party assessments. Information like NOAA's FishWatch and Fish Stock Sustainability Index (FSSI) data are some of the best indicators for U.S. seafood's sustainability. Used alongside third party suggestions, fishery management data can provide a more accurate account of sustainability and prevent incomplete information from wrongly limiting U.S. seafood markets.

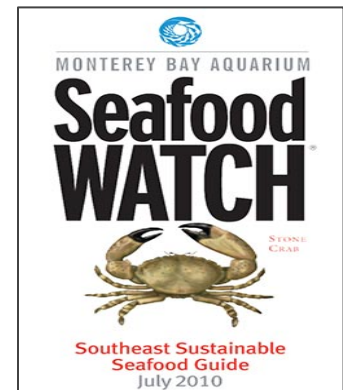
Key Findings

- Third-party ratings and certifications do not consider the environmental and economic benefits of supporting local seafood over foreign imports. Benefits include: energy conservation, sustainable management, food safety, job security, and contributing to local economies. **Third party suggestions to support foreign fisheries over local seafood can cause negative environmental and economic impacts.**
- The science and information behind third party ratings is not immediately transparent.
 - On a closer look, **seafood guides are often outdated or do not use the most comprehensive science available.**
 - Many environmental groups and industry members have **questioned the validity of MSC's complex certification process.**
 - **Third party suggestions do not always include and rank every available fishery or species.** This can curtail consumer awareness of underutilized or otherwise sustainable fisheries.
 - **These factors can create market incentives and disincentives that are not based on a fishery's actual sustainability.**
- U.S. fisheries are some of the best managed in the world.³ The Magnuson Stevens Act (MSA), which is enforced by NOAA, legally mandates fisheries to follow strict conservation standards that incorporate the "best science available." Federal regulators tailor management plans to the needs of each fishery, ensuring that even rebuilding fisheries will become fully viable. **Third party guides and certifications may encourage consumers to avoid seafood stocks that are**

being harvested sustainably but are in the process of rebuilding. This can undermine current management efforts.

Seafood Guides

Many organizations have published guides to help consumers choose between seafood options. Guidelines generally include three categories and are often color-coded, ranking marine species as worst (red), OK (yellow/orange), or best (green) choices. Popular guides include the Monterey Bay Aquarium's "Seafood Watch," the Blue Ocean Institute's "Guide to Ocean-Friendly Seafood," the Environmental Defense Fund's "Seafood Selector," and the World Wildlife Fund's "Consumer Guides," among others.



Main Issues

- Ratings often do not consider local habitat features
- Ratings do not promote local seafood
- Ratings often do not use the most recent science
- Ratings often conflate separate stocks of the same species
- Ratings often exclude underutilized species

While the Magnuson-Stevens Act legally mandates that fisheries managers use the “best scientific information available,”⁴ third party seafood rating institutions do not have the same requirements and transparency. As a result, ratings may be based on old science, generalizations, and conflated information.

Example 1: Atlantic spiny dogfish

In 2010, NOAA declared the Atlantic spiny dogfish stock fully rebuilt⁵ from unsustainable levels in the 1990s. The Atlantic spiny dogfish is now a healthy, sustainable stock that -- with expanded market demand -- could become a staple example of sustainable seafood, support local fishermen, and improve the marine environment. NOAA's sustainability measurement, the Fish Stock Sustainability Index (FSSI), rates Atlantic spiny dogfish as a perfect 4 on its 4-point scale.⁶



Atlantic spiny dogfish.
Picture from NOAA Fisheries

By purchasing this abundant species, consumers not only buy a sustainable product, but they also support struggling U.S. fishermen.⁷ Atlantic groundfishermen are facing serious economic uncertainties due to the slow recovery of more popular Atlantic species like cod and flounder. Because the small dogfish sharks likely compete with groundfish for food,⁸ increased consumer demand for the species may also help cod and flounder stocks recover.

Yet, the Monterey Bay Aquarium Seafood Watch program categorizes U.S. Atlantic spiny dogfish as “Red/Avoid” because dogfish grow slowly and the fishery uses trawl

gear.⁹ The Aquarium instead promotes Canadian spiny dogfish as a “Good Alternative” because Canadian fishermen use longlines.¹⁰

Seafood Watch’s rating is based on poor scientific information – the program assumes that trawl gear is highly damaging in every ecosystem, though in practice this is untrue. While trawl gear can have negative environmental impacts on sensitive environments, it has little effect¹¹ on the sandy, gravelly Atlantic seabed,¹² in which Atlantic spiny dogfish reside.

Consumers following the Seafood Watch program are misled into believing that they should avoid U.S. Atlantic spiny dogfish, but purchasing this seafood is actually one of the best choices for both the environment and U.S. fishing communities.

Example 2: Atlantic silver hake

The penalization of Atlantic trawl fisheries is apparent throughout the Seafood Watch list and in guides from other organizations, such as the Blue Ocean Institute. Although 24 Atlantic stocks, including silver hake, pollock, and haddock, are rated as a 4 on NOAA’s FSSI list,¹³ and are being promoted by scientific¹⁴ and environmental¹⁵ groups as underutilized, healthy species that support U.S. fisheries, none of these species can attain a “Green/Best Choice” categorization if the respective fishery uses trawl gear.

Seafood Watch lists the Atlantic silver hake stock as “Yellow/Good Alternative,”¹⁶ but on closer examination some serious red flags about the science emerge.



Atlantic silver hake.
Picture from NOAA Fisheries

For one, the information is dated. The silver hake stock report dates back to 2004 -- a year before the species began intensive rebuilding efforts. While NOAA’s FSSI ratings are updated every few months, many of the Aquarium’s evaluations, like the Atlantic black sea bass and Southern flounder evaluations, are almost 10 years old.

On the Seafood Watch report scorecard, the silver hake fishery’s bycatch is rated as “moderate,” although the program admits this is not based on “observable evidence.”¹⁷ In fact, bycatch in the silver hake fishery is low, as is contact with protected species. According to the Gulf of Maine Research Institute, the fishery’s bycatch levels are at two percent,¹⁸ well below the five percent bycatch level NOAA mandates.¹⁹

Lastly, seafood guides, like Seafood Watch and the Blue Ocean Institute’s Seafood Selector,²⁰ fail to differentiate between separate stocks, which can distort overall ratings. For example, the Northern silver hake stock is currently healthier than the Mid-Atlantic silver hake stock,²¹ yet in both guidelines a yellow score is assigned to the species as a whole. This skews the results, giving the hake a lower overall score that is not reflective of the status of the Northern stock.

Example 3: Failure to review “Trash Fish”

Even the most popular seafood guides are incomplete and do not feature ratings for every species. Recently, the old fisherman’s term “trash fish” has become a media buzzword drawing consumer attention towards underutilized species. As popular Northeast species like cod and flounder are rebuilding, other healthy Atlantic stocks, like spiny dogfish and silver hake, along with the acadian redfish, pollock and butterfish, are being promoted as sustainable alternatives. But the Seafood Watch and Blue Ocean Institute guides do not include ratings for many of these lesser known species. This exacerbates a lack of consumer awareness that can undermine important economic and environmental initiatives.

Seafood Certifications

Seafood certification programs evaluate individual fisheries using a variety of sustainability factors. If the fishery meets the program’s requirements, it is deemed “sustainable” and can package its seafood using an eco-label from that certification organization. The most popular program is the Marine Stewardship Council, which is headquartered in London.



Main Issues

- Certification/recertification is expensive for fishermen and retailers
- Certification/recertification guidelines are constantly changing
- Certification eco-labels do not promote local seafood
- Certification eco-labels are not inclusive to every sustainable fishery -- a fishery must opt-in

In comparison to seafood guides, certification programs provide more specialized, in-depth evaluations. By focusing on individual fisheries, evaluators can account for the specific needs of a fishery and can work with industry members to ensure that they are using relevant science.

Because MSC certification is internationally recognized, the program can be valuable to U.S. fisheries with international markets. The MSC program also provides transparency and helps assure local consumers and retailers that imported seafood is indeed harvested sustainably.

But, for U.S. seafood providers and consumers of domestically harvested products, these benefits are limited.

The MSC label is not an across-the-board measure of sustainability. While the program provides thorough and scientifically based assessments, the MSC label can also create an unlevel playing field for sustainable seafood. Because fisheries must opt-in to the program, the MSC seal of approval only represents specific fisheries or certain processors that can afford certification. This creates a “pay to play” scenario. MSC certification

generally costs between \$15,000 and \$120,000.²² Fisheries without an MSC label may be equally, or even more “sustainable” than certified fisheries, but may not generate as much consumer interest because they are not paying for the MSC program. To that same point, certain processors in a fishery that can afford certification may obtain a market advantage over others in a sustainable fishery, even if all are following the same conservation standards.

This impacts the strength of U.S. jobs and seafood standards. In turn, the program can create increased market demand for one “sustainable” stock over another.

MSC’s evaluations and re-evaluations, which are intended to address international sustainability issues, can also create difficulties for U.S. industry members, who have to keep up with the program’s intricate, constantly changing sustainability targets. U.S. fisheries already follow strict and expansive regulations.

Example 1: Alaskan salmon

MSC certification can be very costly. In 2012, the Alaskan salmon industry decided to stop their recertification program due to its costs, complexity and inconsistent standards.²³ The MSC program cost Alaska’s Department of Fish and Game a total of \$2.7 million in 2008, with some individual processors paying up to \$180,000 (and the costs are likely higher now).²⁴



Alaskan salmon fishermen.
Picture from NOAA Fisheries

This created an issue for large retailers with corporate policies aimed at supplying MSC-labeled seafood to customers. In June of 2013, Walmart decided to stop providing sustainable Alaskan seafood if the fishery was no longer paying for MSC recertification.²⁵

Alaska Senator Mark Begich responded with a letter to Walmart’s president, asking that the corporation re-evaluate their decision.²⁶ Senator Begich stated: “The MSC’s effort to promote sustainable fisheries has become more of a burden than a boost to sustainable fishing in Alaska. Alaskans wrote the book on responsible, sustainable fisheries management. To have to try to comply with the moving target that is MSC standards is not only unrealistic, it’s insulting.”

Alaska’s fisheries were some of the first to gain certification under MSC guidelines because of the state’s sustainable practices. Though Alaskan salmon will be managed under the Responsible Fisheries Management (RFM) program,²⁷ Walmart will now likely need to rely more heavily on foreign salmon markets over U.S. seafood.

Example 2: Russian pink salmon

The MSC label gives certified international salmon suppliers a market advantage over Alaskan salmon, whose fishery decided to stop recertification via the MSC program. But

this advantage is not based on sustainability. MSC's own evaluations rate Alaska's management as better than both Russia and Canada's.²⁸

A July 2 investigative article by Seafood News reporter John Sackton²⁹ revealed that Walmart's current demand for MSC-certified Russian pink salmon likely exceeds the available supply. Because the corporation is no longer purchasing Alaskan salmon, this leaves the MSC-certified salmon market vulnerable to price inflation.

In a recent interview,³⁰ Glenn Reed, president of the Pacific Seafood Processors Association, asked, "is the world ready to have one company [MSC] declare themselves the sole owner of what is 'sustainable' or is there a broader way to look at it?" While MSC provides valuable insights and standards for bettering fisheries, the label alone is not the only measure of sustainability. Treating it as such undermines the importance of effective fisheries management and ignores other important factors, such as the value of locally sourced seafood, food safety, and economic growth.



Walmart wild salmon product

Saving Seafood conducts media and public outreach on behalf of the commercial fishing industry, connecting members of the fishing community to the people who make the decisions that affect their livelihoods. Saving Seafood works with owners, captains, fishermen, seafood processors and brokers of the eastern United States who are dedicated to the preservation of the resource that has provided their profession, and that of their American forebears, for generations.

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