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An open letter and fact sheet to address negative and inaccurate statements about the MSC program by ASMI, Alaska elected officials and trade journal reporting

For many years, MSC worked closely and collaboratively with the Alaska Seafood Marketing Institute (ASMI) to support its charter to market Alaska seafood in global markets. With demand for credible, independent third-party scientific confirmation of sustainability by many market buyers, MSC certification has served as a benefit for Alaskan and other fisheries in marketing to these buyers. We are proud of our relationship with the Alaskan fishing industry and proud to help bring fishermen, industry members, government fishery managers and state leaders recognition for their demonstrated commitment to sustainable fishing.

For the last few years as ASMI has developed and promoted its own certification program, MSC has stayed focused on continuing its partnership with the Alaskan fishing industry regardless of attacks and misinformation as ASMI has attempted to discredit MSC in order to gain acceptance of its own program. We greatly value the participation of Alaskan fisheries in the MSC program, and we have harbored hopes of resurrecting a cooperative and productive relationship with ASMI to support the Alaska fisheries that continue to choose MSC certification. However, in the face of escalating misinformation by ASMI, elected officials, and inaccurate and unsupported conclusions by John Sackton in particular in writing for the Seafood News and Undercurrents trade journals, MSC is compelled to speak out against falsehoods regarding the MSC.

The debate around MSC not only is being framed wrongly, but narrowly. What is really at stake is our entire conservation agenda, as a nation and as a player in protection of seafood – a vital global food resource that provides 16 percent of the world’s animal-based food protein.

The September 24 U.S. Senate Oceans, Atmosphere, Fisheries and Coast Guard Subcommittee hearing on sustainable seafood certification is a recent and particularly egregious example of biased and inaccurate discussion of the MSC program. With due respect to Chairman Begich, exclusion from the hearing of the MSC, the world’s leading seafood sustainability certification program and a main subject of the hearing, suggests the purpose of the hearing was not to gather informative testimony on the subject but to posit a particular position based on misinformation.

We are particularly concerned that ASMI, with the apparently unquestioning engagement of Alaska's elected officials, has not only launched a negative and misleading campaign against the MSC, but called into question major retail and foodservice companies that have shown great leadership and have had a positive impact in the sustainable seafood movement through their use of and support of the MSC program among other efforts. To be clear, this commitment by these companies has not resulted in any intention or action to discontinue selling or serving Alaska seafood, as was misreported.

Why is a segment of the Alaskan industry doing this? Statements regarding National Park Service vendors or major retail and foodservice companies refusing to buy Alaska seafood were not accurate. Senator Murkowski accused the MSC of "disparaging" Alaska's fisheries. We have never done so. Claims of costs being too high, lack of transparency, MSC meddling in fisheries management or MSC being able to change the standard at its discretion are not true. These and other inaccurate statements are addressed in the attached fact sheet and important information is contained there for anyone who wants to discern facts from rhetoric designed to mislead. For the record, the Governor and U.S. Senators from Alaska have never contacted the MSC to obtain information from us on our program.

The majority of the ASMI board members are large Seattle-based processors of Alaska's seafood. That makes Senator Begich's statement in an article on Intrafish on September 24 curious: "You can understand the sensitivity. We take it seriously. It's real business," Begich said. He added that business based outside of Alaska have "come in, extracted our resources." Is the Senator acting in the interest of Alaskan fishermen and processors or business based outside of Alaska, extracting Alaska resources?

ASMI has apparently recognized the market reality of the value of and need for sustainability certification, as over the last few years they have appropriated more than \$7 million dollars of industry and taxpayer money designated for marketing to create their own certification program and promote it as credible. MSC is a mission driven nonprofit and by no means concerned with being a monopoly. Participation is voluntary, and we welcome alternative approaches and programs that support the objective of demonstrated and verified sustainability by the world's commercial fisheries, as long as those efforts are credible. The ASMI Responsible Fisheries Management program has been determined by independent benchmarking studies to be an industry developed and controlled program that falls far short of credible. ([Environmental Law Institute, July 2012](#); [James Sullivan Consulting, September 2012](#)). And in a September 24 article in the Alaska Dispatch every one of the statements by ASMI's Randy Rice about the MSC program, FAO consistency and ISO certification is factually incorrect.

The issue is not whether Alaska's fisheries are sustainably managed. We recognize Alaska's excellent record of sustainable management. Many Alaskan fisheries are MSC certified and that has enabled us to promote for more than a decade Alaska's longstanding leadership on fishery sustainability. The issue in rejecting independent sustainability certification of Alaskan or any U.S. fisheries in favor of approaches that are essentially industry and management self-reporting is the potential damage this could do to both the international image of Alaska and the U.S. and the role of and need for reliable certification in the global seafood market.

With the U.S. importing the majority of its seafood, don't we want to set an expectation and example for verification of source and sustainability beyond claims by the source itself? Again, this isn't about Alaska feeling it doesn't need to prove its sustainability to anyone as Senator Murkowski has suggested. Instead Alaska and the U. S. have an opportunity to continue to be leaders among world fisheries by demonstrating we as a nation meet the world's leading standard for sustainability and would expect other fisheries worldwide to do the same.

International markets have expressed a clear preference for a reliable and well-recognized world standard and have indicated they are less receptive to adopting sourcing policies that rely on regional, national and local self-developed claims regarding sustainability. MSC isn't "foreign" Senator Murkowski; it's global. And Alaska and its thriving fishing economy and jobs are fully part of and dependent on that global industry.

Sustainability certification is closely parallel to food safety certification. Do we want to remove the independent safeguards we've put in place on sources and supply chain handling to ensure the safety of the food we eat and accept all nations simply telling us they are being responsible? The debate on Alaskan or U.S. self-certification has very dangerous and broad consequences.

MSC is an open, transparent, participatory organization with mandates for governance and other representation from all sectors and geographies. Numerous checks and balances are in place to ensure we remain science-based and reflect global consensus regarding sustainability measures. As a global standard setter we are, of course, subject to criticism and disagreement with specific certification outcomes. We are strengthened and improved by our supporters and critics alike, people and organizations who often move in and out of both of those roles. In my six-year experience with MSC, however, I have seen nothing but a commitment and actions to uphold the highest standards of integrity and inclusion, and adherence to a structured policy process that ensures transparency, wide consultation, due consideration and scientific consensus on maintenance and implementation of an independent global standard. Alaskan and other U.S. industry members have been and continue to be an important part of the governance and development of MSC policies.

MSC has not been taken over by NGOs, industry, government or any other sector. And we do not have a goal or interest in lining our coffers or monopolizing a brand. We are a nonprofit that survives on voluntary logo fees and philanthropic contributions, and we remain true to our mission of serving a seafood industry, conservation community, governments and others interested in increasing fisheries' commitment to sustainable practices.

Suggestions that the cost of MSC certification for a fishery approaches \$2 million or even anything close are ridiculously inflated. MSC is not involved financially or otherwise in a contract between a fishery seeking assessment to the MSC standard and their selected independent accredited certifier who can deliver that service, charging only for their time and expenses. But we are aware that such contracts range from about \$25,000 to \$175,000 depending on the complexity of the fishery and extent of

work required of the assessment team. In the case of the current statewide reassessment of the Alaska salmon fishery, the fishery qualifies for an MSC board-approved program for any fishery in its third assessment that, for Alaska salmon, is covering 75 percent of the assessment costs.

MSC has also been accused of acting as fishery managers. We have in no case ever done so. That is the job of government agencies, international fishery management organizations and others. In the case of Alaska, this issue has been raised in several contexts, including hatchery operations in the Alaska salmon fishery. MSC did not first bring forth a concern about the impact of hatchery operations on survivability of the wild salmon stocks, nor does the MSC standard attempt to establish appropriate levels of hatchery proportions. That is the work of Alaska fishery managers. The MSC standard simply requires that there be an objective, science-based determination that hatchery releases are not significantly impacting wild stocks. Alaska Department of Fish and Game (ADFG) biologists, however, several years ago examined the issue and released a study containing evidence of reason for concern regarding the impact of continuing increases in hatchery releases on wild stocks ([Brenner, et al, 2012](#)). Independent scientists assessing sustainability of wild stocks against the MSC standard agreed with the ADFG biologists that preliminary indications and lack of data didn't support solid scientific determinations of sustainability in one particular area, Prince William Sound, and have held back assessment of that one unit in contrast to 13 other units covering all other Alaska salmon, which have been recommended for recertification by the group of Alaskan fishery experts on the MSC assessment team. On the one unit, the team will await publication of further data examining hatchery impact on wild stock.

On a personal note, I have lived in Alaska and have worked on the water in the Alaska fishing industry. I have known firsthand and appreciate hardworking, dedicated men and women who both harvest and protect Alaska's rich natural fishing resources. Instead of accepting false rhetoric about the MSC and its value to Alaska's fishing economy in a world that demands an international certification program, I sincerely hope they and companies who trade in Alaska's high quality seafood, will ask some hard questions about why some of the large processors of their seafood are intimidating smaller Alaska-based processors, why their elected officials want to introduce legislation that bans opportunities to level the playing field with international fisheries pirating or substituting fish in competition with Alaska and its high standards for fisheries management and sustainability, and why ASMI is spending millions of dollars intended for marketing Alaska's seafood on fighting a voluntary program that costs a fraction of a penny on the pound with more than 92 percent of logo use fees on products promoting Alaska salmon being paid for by European buyers who pay well for MSC-certified seafood. In fighting MSC, what does Alaska fear or have to hide? In prohibiting federal agencies from using third-party programs in considering seafood sustainability, as Senator Murkowski has proposed become federal legislation, or suggesting the Magnuson-Stevens Act alone is a credible fishery sustainability certification for all U.S. fisheries, what example and precedent are we in the United States setting for global market competition and ocean resource conservation?

These questions are what should be addressed in hearings and meetings with major buyers, not grandstanding and false statements about the MSC program or buyer purchasing policies regarding Alaska seafood. A lot is at stake for Alaska, the U.S. and

fisheries worldwide. We cannot let narrow interests wanting to restrict voluntary industry assessment of sustainability of U.S. fisheries to falsely frame the issue and distract from a substantial dialogue about how Alaska and other U.S. fisheries, through an international program designed to recognize and enhance market reward for well-managed fisheries, can showcase that American fisheries are among the world's most abundant and well managed fisheries.

I invite Alaskan and U.S. fishermen, elected officials, ASMI members or anyone engaged in or with the seafood industry to contact me to talk about the MSC program, what it is and isn't and how MSC can continue to support our nation's environmental leadership and economic benefits to the state of Alaska's and United States' trade in the international seafood market.

Sincerely,

Kerry Coughlin
Regional Director, Americas
Marine Stewardship Council
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