



Animal Welfare Institute

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**Comments on the Marine Stewardship Council's Chain of Custody (CoC) Public Consultation, submitted on the 28th of September 2016 via an online form at the following url:
<https://improvements.msc.org/database/product-provenance/consultations/first-consultation-2016>**

MSC is proposing initially requiring information on the fishery of origin, species of fish caught and country of origin. It is stated that in the longer term, additional information can be added, such as gear type, vessel name, catch area and catch date. The Animal Welfare Institute believes that rather than being added in the longer term, information on gear type, etc. should be an immediate element of the MSC Chain of Custody Key Data Element (KDE) requirements in light of recent changes to both EU fisheries regulations and the US IUU and Seafood Fraud Traceability requirements.

We urge you to consider including in the KDEs a reference as to whether there is known marine mammal bycatch taking place in a fishery. As you will be aware, the Foreign Fisheries Import Provisions of the US Marine Mammal Protection Act (MMPA) mean that all entities wishing to export their seafood products to the US must prove parity with US fisheries as to the level and management of marine mammal bycatch.

We also propose that additional information be included, such as the fact that a company is known to engage in activities that involve directed hunts of marine mammals. A number of MSC certified fisheries in Norway include fishing vessels that also engage in whaling. In both Iceland and Norway certain MSC-certified suppliers are involved in the processing of whale meat. A number of retail and food service companies have indicated that they are aware of this issue, and are unwilling to purchase seafood linked to whaling or sealing.

AWI continues to hope that MSC will consider our previous requests not to certify any company engaged in directed takes of marine mammals, especially given that consumers do not expect that an MSC labelled product to be linked to such hunts. Including information in the KDEs will, however, be an important first step that will allow for responsible and ethical retailers to respond to consumer demand.

Thank you for your consideration.

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