

Assessment of the Marine Stewardship Council (MSC) Fisheries Certification Programme

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1. Seafood Certification Schemes – are they adequate markers of sustainability?

A variety of seafood certification schemes have developed over the past decade, all claiming that the fish that they certify have been sustainably caught or farmed and that they are the best option for consumers to purchase.

Greenpeace is of the opinion that no fully credible certification programme for sustainable wild-caught or farmed seafood currently exists. So far, the challenges facing our oceans are far from being tackled and the fundamental principles of precaution and ecosystem approach are not yet incorporated into fisheries management.

In order to more clearly explain Greenpeace's position, seafood certification schemes have been assessed systematically with the help of a tool¹ created by a specialist in certification (particularly with ethical certification systems such as the Forest Stewardship Council). The tool was developed for Greenpeace to establish how well various certification programmes can help to deliver Greenpeace's vision for healthy oceans – a network of marine reserves covering 40% of the world's oceans, with sustainable and fair use of the remaining 60%. The tool also allows detailed comparisons of various certification programmes with each other and with industry best-practice. Although it was developed with fisheries and aquaculture certification in mind, the tool has been developed based on best practice within the broader certification industry. A public version of the tool is available on request from Greenpeace.

2. Greenpeace involvement with the MSC

From the early development of the Marine Stewardship Council (MSC), Greenpeace has had concerns with regard to the transparency and governance of the MSC, and has identified significant flaws in the MSC Principles & Criteria that underpin the work of the MSC. Perhaps more importantly, Greenpeace has also identified significant shortcomings in the way the MSC Principles & Criteria are applied by certification bodies that assess fisheries from early on. These shortcomings have resulted in a wide variation of quality and consistency in MSC assessments, resulting in some highly unsuitable fisheries being certified as sustainable.

Greenpeace has provided advice and comment on the MSC's standards and governance when asked, both privately to the MSC and publicly to external bodies, such as the Royal Commission on Environmental Pollution in the UK (for its *Turning the Tide* report on the environmental effects of fisheries). Alongside other NGOs, Greenpeace has engaged in the official objections procedure over three key MSC fishery certifications: the New Zealand hoki fishery, the Patagonian toothfish fishery, and the Alaska pollock fishery.

The MSC has addressed many of the transparency and governance issues that Greenpeace initially identified; however Greenpeace feels that little has changed with regard to the MSC Principles & Criteria. The MSC has recently provided more detailed guidance and a methodology for the interpretation & application of its Principles & Criteria.² A review of the document as part of a detailed assessment of the MSC certification programme (see below) shows that while it may address issues of consistency in future assessments, it does not address the fundamental concerns that Greenpeace has with the MSC Principles & Criteria. In addition, it will only apply to new fisheries as they enter the certification process. It will not apply to those that are certified until they enter the recertification process (required every 5 years after certification). The MSC itself states that "it is confident that the new default assessment tree will significantly

improve the consistency of assessments, without either raising or lowering 'the bar' against the average standard set in existing MSC fisheries."³

Engaging with all the fisheries undergoing MSC certifications is extremely resource intensive and Greenpeace has limited its engagement with the MSC to opposing the most unacceptable of the MSC certifications on a national basis.

3. Strengths of the MSC fisheries certification programme

3.1 Professionalism of the bodies involved in the programme

The MSC, the Certifying Bodies (those that assess and certify fisheries and supply chains to the MSC standards), and the Accreditation Body (which monitors the work of the Certifying Bodies) all operate at a professional level, following acceptable industry practice to apply and monitor the MSC's standards.

3.2 Clear scope of the certification

MSC oversees two related certifications. The scope of the first is as described on the packaging of MSC certified products: "This product comes from a fishery which has been certified to the Marine Stewardship Council's environmental standard for a well-managed and sustainable fishery." It relates to marine and freshwater fisheries activities up to but not beyond the point at which the fish are landed. The programme currently only applies to wild-capture fisheries (including, but not limited to shellfish, crustaceans and cephalopods), and also to certain types of fisheries that may be 'enhanced' by releasing young fish grown in hatcheries into the wild, such as hatchery-stocked salmon fisheries.

The second certification programme is the Chain of Custody certification that ensures traceability of certified fisheries products from point of landing to sale, and allows use of the MSC logo on packaging and at fish counters, restaurant menus, etc.

3.3 Acceptable availability of documentation and information

The MSC shows a high level of professionalism and acceptable transparency in this area. Most documentation is available online. The new website is relatively easy to navigate. Other more technical documents are mentioned online, with specific contact details provided to allow for document requests. All documents were sent, and most questions were answered fully, within a week of request.

Assessment reports are highly detailed, fully referenced and peer reviewed. Completed assessment reports are available for public comment before the final assessment report is accepted.

3.4 Acceptable stakeholder engagement

Stakeholders are involved in all levels of the programme, from the development of standards, to management of the programme. The MSC is a member of the ISEAL (International Social and Environmental Accreditation and Labelling) Alliance which has developed a code of good practice for social and environmental standardization. Compliance with the Code is checked by peer review amongst the members. MSC's membership ensures an acceptable level of: the involvement of stake holders; the quality of stakeholder representation; and reasonably balanced views of stakeholders in the standardisation process and governance.

However, there are other certification programmes, such as the Forest Stewardship Council, that have stronger standards for ensuring a higher and more balanced level of stakeholder involvement (for stakeholder involvement within the management of MSC certified fisheries, see 4.1). The MSC's approach to stakeholders tends to be more restrictive than other schemes in that it is biased toward science rather than local traditional fisheries knowledge and tends toward a formal objections/complaints process (see 4.2). In addition the centralized nature of MSC makes it harder for local groups to become informed. The MSC is currently reviewing ways to strengthen and broaden its stakeholder involvement.

3.5 Standards are performance based

MSC standards are performance based, i.e. certified fisheries go beyond just having the right documents and systems in place and must demonstrate proof of application through regular on-the-ground audits. This puts the programme ahead of others such as ISO certifications.

4. Weaknesses of the MSC fisheries certification programme

4.1 Limited scope of the certification

Few socio-economic aspects are considered, and the one principle related to social impacts is to be interpreted as requiring the *existence* of a suitable framework for legal & customary rights, not about questioning the *effectiveness* of this framework, according to the guidance document. Issues involving allocation of quotas and access to marine resources are considered by the MSC to be beyond the scope of the programme – these aspects, particularly, can lead to a lack of support for a certified fishery from local stakeholders who may feel that their concerns are not addressed. However, while not considered within its scope by the MSC, other sustainability and/or ethical certification systems, such as Friend of the Sea and the Forest Stewardship Council do include socio-economic considerations.

4.2 Objections process is not accessible to all

There are both time and financial constraints that may make the official objections process⁴ inaccessible to some stakeholders. Stakeholders wishing to object have 15 working days to file a fully detailed 'notice of objection' following publication of the final assessment report, upon which the independent adjudicator may request further clarification within a time limit to be defined and as appropriate to the detail needed. Fees are charged for complaints – the maximum level established by the MSC Board is presently £15,000. There are also constraints on the type of complaint allowed depending on previous involvement in the certification process.⁵

In effect, the process requires a stakeholder to follow the assessment process from the beginning, and to be up to date with all the issues in the fishery at the time of the final assessment report in order to be able to launch an objection within the timeframe and to obtain funds for the fees. With so many fisheries currently in assessment, this is too resource intensive for many stakeholders.

While the MSC claims that there are many other ways to raise concerns about the performance of a certifying body, either directly to the MSC or to the accreditation body, it is not clear how these concerns are addressed outside the formal process.

4.3 Weakness of the *MSC Principles and Criteria for Sustainable Fishing*

This is the key area of concern for Greenpeace – the standards. While the standards are performance based (see 3.5), they are not strong enough.

4.3.1 Requirements are not stringent and weak language is used

The MSC Principles & Criteria uses language such as "where appropriate", or applies only to certain situations. Similarly, the term "should" instead of "shall" is used. In certification terminology "should" implies a conditional cause, while "shall" would imply it is mandatory. This leaves room for interpretation and lower standards. While there is a guidance document for interpretation of the Principles & Criteria, there are similar language issues involved (see 4.4.1).

The MSC is currently reviewing all its documentation to ensure consistency in language use and definitions.

4.3.2 MSC Principles and Criteria fail to adequately address critical issues

1. A sustainable fisheries standard needs to proscribe destructive catching methods, including explosive poisons, demersal otter trawl, beam trawl and dredging.

Criteria under MSC Principle 3 look good on the surface:

Fishing operation shall:

- 12. make use of fishing gear and practices designed to avoid the capture of non-target species (and non-target size, age, and/or sex of the target species); minimise mortality of this catch where it cannot be avoided, and reduce discards of what cannot be released alive;*
- 13. implement appropriate fishing methods designed to minimise adverse impacts on habitat, especially in critical or sensitive zones such as spawning and nursery areas;*
- 14. not use destructive fishing practices such as fishing with poisons or explosives.*

Greenpeace would expect these criteria to immediately disqualify any bottom trawling practices from certification. However, the MSC Fishery Assessment Methodology and Guidance to Certification Bodies (p10) makes it clear that poisons and explosives are not just *examples* of destructive fisheries, they are the only fisheries that the MSC explicitly considers destructive and excludes from certification:

2.6. A fishery shall not be eligible for certification if it utilises fishing with poisons or explosives. The only fishing practices that the MSC considers to be “destructive fishing practices” in the context of an MSC assessment, at this time, are fishing with poisons or fishing with explosives.

This has led to many bottom trawl fisheries being certified. Greenpeace believes that bottom trawling is an inherently destructive fishing method and cannot, under the current oceans governance, be considered sustainable.

Bottom trawls (including flatfish beam trawls and demersal ‘otter’ trawls for demersal round fish) and dredges (including suction and hydraulic dredges) disturb the benthic (bottom dwelling) ecosystem in a number of ways: by removing, damaging or killing organisms; by altering seabed complexity; and/or by altering overall benthic production, with knock-on effects for pelagic (mid-water) production, biochemical processes and wider functioning of the marine ecosystem.^{6, 7, 8}

While the magnitude of these impacts are not uniform for all bottom trawl fisheries, and depend on certain factors (e.g. the type of trawl gear used, habitat composition, life history of component species, the natural disturbance regime), even for those bottom trawls operating in the least sensitive benthic environments, these areas are often regularly trawled so have little chance to recover, and there are significant levels bycatch. Fish that are too small or the wrong species are thrown overboard, dead or dying. Demersal otter trawls commonly throw away over 30% of their catches (by weight) while for beam and shrimp trawls this is often much higher.^{9, 10}

Furthermore, a recent study shows that trawling impacts on ecosystems even at depths where trawlers do not go. In the study area of the NE Atlantic, overall fish abundance has fallen significantly at all depths between 800–2500 m, considerably deeper than the maximum depth of commercial fishing (about 1600 m).¹¹

2. A sustainable fisheries standard needs to proscribe fishing on depleted stocks (biomass below a precautionary level), or fishing at a rate that risks causing a decline in the stock (fishing mortality above a truly precautionary level).

MSC Principle 1 explicitly states that fisheries targeting depleted stock *may* be certified:

MSC Principle 1: A fishery must be conducted in a manner that does not lead to over-fishing or depletion of the exploited populations and, for those populations that are depleted, the fishery must be conducted in a manner that demonstrably leads to their recovery.

Greenpeace believes that taking fish from a depleted stock, or fishing at a rate that risks causing a decline in the stock, can never be consistent with the precautionary approach, and hence is not considered sustainable.

4.4 Weakness of the methodology and guidance documents

The *MSC Fisheries Certification Methodology* sets out what accredited certifiers must do when they assess fisheries against the MSC Principles and Criteria for sustainable fishing. The *MSC Fishery Assessment Methodology & Guidance to Certification Bodies* are the new guidelines that prescribe how the MSC standard should be interpreted when assessing fisheries and defines how to score a fishery. (Note that the

following analysis is based on the new guidance document, which does not apply to fisheries that were already certified or had entered the assessment process at the time of publication in July 2008.).

4.4.1 Requirements are not stringent and weak language is used

As for the MSC Principles & Criteria, weak language leaves room for interpretation and lower standards. This will impact on every issue of fisheries sustainability, from stock levels to traceability to stakeholder involvement within the fisheries management. In addition, for Greenpeace there is no guarantee that a certified fishery will not have issues that Greenpeace considers amongst the most unsustainable practises (that will grade the fishery “red” according to Greenpeace criteria).

4.4.2 The Principles & Criteria are compromised by a scoring system that allows for different levels of attainment of the criteria in the scoring of Performance Indicators

MSC Fisheries Certification Methodology, p20–1: 3.3.2 The certification body shall interpret the scores allocated to the fishery as follows: It is required that the fishery obtains a score of 80 or more, based on the weighted average score for all Criteria scored under that Principle, for each of the three Principles in order to be certified. If a fishery achieves a score of less than 80 on any Principle, certification will not be awarded. It is required that the fishery obtains a score of 60 or more for each Performance Indicator and Criterion in order to be certified. If a fishery achieves a score of less than 60 on any Performance Indicator or Criterion, certification will not be awarded. 3.4.2 Where the fishery achieves a score of less than 80, but of at least 60 for any individual Performance Indicator, the certification body shall set one or more conditions for continuing certification. The condition(s) shall improve performance to at least the 80 level within a period set by the certification body but no longer than the term of the certification, subject to Sections 3.4.2.1 and 3.4.2.2

While the intention to move a fishery towards greater sustainability, by having a lower entry requirement, may be an effective way to improve fisheries, Greenpeace has five main issues with the MSC method:

1. Levels set for Performance Indicators ‘pass marks’ are too low on many criteria.

Passing with a score of 60 on a particular Performance Indicator (PI) means fisheries are certified with unsustainable practices, despite being required to improve them within a certain time frame to maintain certification. For example, where a fishery operates within the habitat of an endangered, threatened or protected species, one would expect that any fishery considered sustainable would certainly not impact on the species, and that a high degree of precaution would be used in the assessment. This does not appear to be the case. For example:

Fishery Assessment Methodology & Guidance to Certification Bodies, p49:

PI: The fishery meets national and international requirements for protection of ETP [endangered, threatened and protected] species. The fishery does not pose a risk of serious or irreversible harm to ETP species and does not hinder recovery of ETP species

SG60: Known effects of the fishery are likely to be within limits of national and international requirements for protection of ETP species. Known direct effects are unlikely to create unacceptable impacts to ETP species.

SG80: The effects of the fishery are known and are highly likely to be within limits of national and international requirements for protection of ETP species. Direct effects are highly unlikely to create unacceptable impacts to ETP species. Indirect effects have been considered and are thought to be unlikely to create unacceptable impacts.

SG100: There is a high degree of certainty that the effects of the fishery are within limits of national and international requirements for protection of ETP species. There is a high degree of confidence that there are no significant detrimental effects (direct and indirect) of the fishery on ETP species.

Species that are on non-binding lists (e.g. IUCN Red List) or requirements that are recognised at intergovernmental level (e.g. FAO International Plans of Action) that are not included in national legislation or binding international agreements, etc. are assessed under the Retained or Bycatch Species Components of the assessment, which have similar scoring issues.

2. A score of 80 is considered acceptable and there are no requirements or incentives from the MSC to move towards scores of 100.

This means that lower standards are considered acceptable, and there is no drive to push fisheries to maximum sustainability. There is also no way for fish buyers to distinguish the lower scoring certified fisheries from those which are doing a really good job, without reading the detailed assessment reports. While there is a separate Performance Indicator that measures the provision of incentives by the fishery management body, this itself is compromised by having a 3 level scoring system:

Fishery Assessment Methodology & Guidance to Certification Bodies, p68:

PI: The management system provides economic and social incentives for sustainable fishing and does not operate with subsidies that contribute to unsustainable fishing.

SG60: The management system provides for incentives that are consistent with achieving the outcomes expressed by MSC Principles 1 and 2

SG80: The management system provides for incentives that are consistent with achieving the outcomes expressed by MSC Principles 1 and 2, and seeks to ensure that negative incentives do not arise.

SG100: The management system provides for incentives that are consistent with achieving the outcomes expressed by MSC Principles 1 and 2, and explicitly considers incentives in a regular review of management policy or procedures to ensure that they do not contribute to unsustainable fishing practices.

3. For some criteria, the standards required to reach a score of 100 are not high enough.

For Greenpeace, a particular concern is the maintenance of the status quo of fisheries management without requirements for marine reserves, and a continuation of fisheries targets that focus on maintaining the stock at the Maximum Sustainable Yield (MSY). In practice, the stock level and the fishing rate that will produce the MSY are very difficult to determine accurately, and this can change with changes in the environment. Scientists have argued for years that even at MSY, stock instability and risk of recruitment failure are already high.¹²

4.4 Results of weak certification standards

4.4.1 Fisheries are, or can be, certified that target depleted stocks

Greenpeace believes that taking fish from a depleted stock (one that has fallen below precautionary levels and continues to decline) can never be consistent with the precautionary approach. Many fisheries management plans contain recovery plans but few have been effective over time. This has been a fundamental failure of fisheries management and there is a real risk that the MSC will simply repeat and add to this problem.

Example: North Sea herring fisheries. There has been an increasing number of North Sea herring fisheries certified since 2005, despite the continual decline of the stock during this time. The scientific body that provides fisheries advice for the NE Atlantic, ICES, warned of an imminent stock decline in 2005.¹³ The ICES stock report for 2008¹⁴ showed that the stock level was well below safe precautionary limits and that the management plan was “no longer in agreement with the precautionary approach.” The “increased uncertainty about the future for North Sea herring” was partly attributed to environmental changes, but also to a combination of various enforcement issues and catch limits being set higher than ICES had advised. One option proposed by ICES to tackle the ongoing management problems was to close the fishery in 2009 in order to allow the stock to recover to a level close to the precautionary stock size level by 2010.

The problematic stock situation and insufficient management response was noted by the MSC surveillance report of the North Sea herring in 2007. Nevertheless, since then two other North Sea herring fisheries have been added to the programme under that management. The herring management plan has since been adapted for 2009¹⁵ and is now considered by ICES to be more precautionary with a better chance of avoiding stock collapse. It remains to be seen whether this management change comes too late to prevent stock collapse.

4.4.2 Fisheries are, or can be, certified that involve a threat to, or the killing of, protected, endangered or threatened species

Furthermore, certified fisheries could obstruct the recovery of protected, endangered or threatened (PET) species, either through overfishing key prey species or by causing adverse food web changes or ecosystem shifts. The MSC Principles & Criteria are insufficiently rigorous on this issue. While the guidelines may have been strengthened, it remains to be seen how this will impact fisheries that have already been certified that may be having an impact on these PET species.

Example: *Alaska pollock fishery.* Pollock is the dominant prey fish in the eastern Bering Sea. The explosive growth of this fishery since the 1960s has been accompanied by steep declines of top predators in the pollock food web – endangered Steller sea lions, depleted northern fur seals, depleted Pacific harbour seals, and some seabird species. This has been the subject of massive controversy and conflict in scientific, political and legal arenas for nearly two decades, and is one of the key reasons why Greenpeace joined a coalition of conservation organisations that opposed the initial certification.

4.4.3 Fisheries are, or can be, certified that involve high bycatch or adverse physical impacts to pelagic or benthic habitats

Only those fisheries that use poisons and explosives are excluded from undergoing MSC assessment. Greenpeace believes that bottom trawl and dredging fisheries are inherently unsustainable (see section 4.3.2.). A number of bottom trawl fisheries have been granted MSC certification, and many more are undergoing assessment.

Examples: *South African hake bottom trawl fishery, New Zealand hoki bottom trawl fishery, Norwegian saithe bottom trawl fishery, Australian mackerel icefish bottom trawl fishery.*

4.4.4 Fisheries are, or can be, certified that are not managed in a manner that protects the integrity of marine ecosystems, have no guarantees that exploitation of the target species is sustainable in the long-term, and do not include the establishment of large-scale marine reserves, or indeed goals and timelines to establish them

Comprehensive, adequate and representative areas for protection and management as fully-protected, large scale, no-take marine reserves are a necessary tool in fisheries management and provide very important commercial and ecological benefits. In addition, where data is lacking, a precautionary approach is demanded that prevents extractive activities until sufficient knowledge is available to confirm that such activities will not impact upon the marine environment.

Although the MSC Principles & Criteria state that no-take zones should be established “where appropriate” this is left open for interpretation. MSC states that it is “non-prescriptive” in relation to marine reserves and other types of Marine Protected Areas (MPAs), viewing them only as “one of several potentially valuable options” for achieving sustainable fisheries.¹⁶ Greenpeace knows of no MSC certified fisheries for which there are requirements to set goals for the establishment of marine reserves. In fact, the MSC certification scheme could undermine processes to implement MPAs by allowing destructive fisheries that operate within areas recognised as worthy of protection into its full assessment process. MSC certified fisheries are only required to stop fishing in particular areas if there is legislation requiring them to do so.¹⁷

Example: *Ekofish Group North Sea twin-rigged otter trawl plaice.* This bottom-trawl fishery currently operates within the Dogger Bank. This area is recognised for its special ecological value, and is in the process of being designated as a ‘Special Area of Conservation’ under the European Habitat Directive, and as a MPA under OSPAR, with the purpose of maintaining biodiversity, conserving threatened species and habitats, and restoring degraded ecosystems. Such an MPA should allow the recovery of ecosystems from previous anthropogenic disturbance; however it is probable that certification of bottom trawling in the area would sanction their continued erosion.

4.4.5 Fisheries are, or can be, certified that are highly controversial

The MSC Principles & Criteria state that “outstanding disputes of substantial magnitude involving a substantial number of interests will normally disqualify a fishery from certification.” The interpretation of this clause has allowed controversial fisheries to be certified.

Examples: *Alaska pollock fishery*. In addition to the issues raised in 4.4.2, there were court rulings against the US Government's poor management of the fishery. Ironically, the fact that conservationists had the right to pursue litigation if fisheries managers failed to fulfil their legal responsibilities contributed to the passing score the pollock fisheries received.

South Georgia Patagonian toothfish. There are major issues with illegal toothfish fisheries in the Southern Ocean that undermine management to a large extent. The certification of the South Georgian fishery caused great controversy, and a coalition of conservation organisations objected to the certification. Although the MSC claims that illegal toothfish fishing in the region of this fishery has been significantly reduced, partly due to measures put in place to achieve certification, there is no evidence that this is due to anything more than the usual movement of IUU vessels from area to area, or these vessels simply being displaced to other areas.

4.4.6 Fisheries are, or can be, certified on the basis of a promise of improvements rather than after key improvements (e.g. "corrective actions" or "conditions") in the fishery have actually occurred

Fisheries are certified that are clearly unsustainable in return for promises of improvement. Greenpeace holds the opinion that fisheries with key issues such as those described above should not be certified until the issues are adequately addressed. Greenpeace understands that fisheries entering the MSC scheme may not start as sustainable fisheries; however, it must be clear that such fisheries will reach sustainability within a demanding timeframe and that the claims made for the product must be true and verifiable at all times. Real, measurable conservation benefits must accrue to the fishery within a relatively short period of time.

Example: *Western Australian rock lobster fishery*. This fishery was known to trap and drown significant numbers of endangered sea lion pups at the time of the original assessment. The fishery was certified in 1999, and recertified in 2006 despite not having achieved all the corrective actions required by the initial certification. Sea lion exclusion devices were not introduced to the fishery until the 2006/07 fishing season.

4.4.7 There is no guaranteed traceability of fish from point of capture

The MSC Chain of Custody Certification applies only from point of landing, which allows a loophole for IUU activities to occur at sea. There are no specific requirements for how to ensure traceability before the point of landing, and any guidance for criteria that could be related to legality and traceability is undermined, again, by the scoring system. For example:

Fishery Assessment Methodology & Guidance to Certification Bodies, p70:

PI 3.2.3 Monitoring, control and surveillance mechanisms ensure the fishery's management measures are enforced and complied with.

SG 60: Fishers are generally thought to comply with the management system for the fishery under assessment, including, when required, providing information of importance to the effective management of the fishery.

SG 80: Some evidence exists to demonstrate fishers comply with the management system under assessment, including, when required, providing information of importance to the effective management of the fishery. There is no evidence of systematic non-compliance.

SG 100: There is a high degree of confidence that fishers comply with the management system under assessment, including, providing information of importance to the effective management of the fishery. There is no evidence of systematic non-compliance.

It must be noted, however, that there are a few MSC certified fisheries, such as the Pacific cod fishery, which land and then process fish on board the fishing vessels. In these cases the traceability can be considered to apply from the point of capture.

5. Beyond certification: MSC as an obstacle to reform of certified fisheries

Efforts to reform aspects of nearly all sizable fisheries are ongoing, some of which involve a large number of stakeholders. As a consequence of the MSC's claim that certified fisheries are sustainable, the organization

has felt it is necessary to defend MSC certified fisheries. Recently, the MSC has gone farther than this, and has begun criticizing Greenpeace's effort to improve the Alaska pollock fishery.

The status quo of the fishery has been defended through press releases and media work, as well as through letters to retailers and other seafood buyers. This conflicts directly with the MSC's 'continuous improvement' model, which seems to have been deprioritised in favour of a more stark line between certified and uncertified fisheries. If this pattern continues with other fisheries, it will further undermine the credibility of the MSC as a certificate for sustainable seafood.

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