

Haarlem, 29th January 2025

Aquatic Life Institute
9710 Klingerman St.
South El Monte
CA 91733

Subject: Response to Aquatic Life Institute's comments on Iceland Responsible Fisheries Public Consultation

Dear Aquatic Life Institute,

Many thanks for taking the time to provide your comments on the GSSI Benchmark Report for the Iceland Responsible Fisheries (IRF).

GSSI is committed to a transparent benchmark process with opportunity for engagement and comments. Following the consultation, GSSI's detailed response to your comments by component number raised in relation to the GSSI Benchmark of the Iceland Responsible Fisheries is set out below.

▪ **Guidelines:**

The response to each of the comments is structured as follows:

1. Description of the component: Essential or Supplementary and the corresponded numeration
2. Text of the Component
3. Submitted Comment
4. Answer from GSSI
5. Conclusion [old part in black] [new part in blue]
6. References [old part in black] [new part in blue]

The answers to the comments and conclusions of the components make use of the GSSI benchmark language, including the following acronyms:

IE: Independent Expert
EC: Essential Component
SC: Supplementary Component
BC: Benchmark Committee
MOCA: Monitoring of Continued Alignment

■ Section D – Fisheries

Essential Component D.1.01

The standard requires the existence of a fishery management organization or arrangement that manages the fishery of which the Unit of Certification is a part..

■ Aquatic Life comment

General comments regarding the IRFM: Wild capture fisheries is the only major food-producing sector that does not take animal welfare into consideration. Given the high degree of suffering that aquatic animals encounter in fisheries throughout the catch phase (capture, retrieval, onboard handling, and slaughter without stunning), and the fact that 2-3 TRILLION animals are caught in the wild each year, we urge IRFM and GSSI to take into consideration pillars of animal welfare into standards and benchmarks.

According to a [recent poll](#), 91% of European citizens said that fish should be protected to the same or greater extent than the welfare of other animals we eat. Iceland is often cited as a model for fisheries management. It has been successful in rebuilding depleted fish populations like cod and maintaining a stable fishing industry. However, it is time to update these fisheries management approaches to include aquatic animal welfare. Including aquatic animal welfare would set a more holistic management strategy to 1. reduce habitat damage from bottom trawler and 2. reduce mortality rates in large pelagic vessels.

From a welfare perspective, perhaps the lowest welfare capture method is bottom trawling. It chases animals to exhaustion and is associated with very high rates of bycatch and mortality. Moreover, the damage to benthic habitats caused by trawling has been shown to release significant amounts of carbon thereby hindering efforts to reduce global warming. For these reasons, the European Environment Agency has classified a ban on bottom trawling in coastal areas as a “ready-to-apply” solution for seabed restoration. We strongly support a ban on bottom trawling.

Applying more gentle catch and retrieval methods via 1. reducing the duration of capture and size of capture, and 2. pumping fish onboard or surface fish slowly to avoid barotaruma and reduce mortality during catch mortality. And importantly, aquatic animals should be stunned prior to slaughter. This means that they should be rendered fully unconscious and remain unconscious until slaughtered. Ice slurry should be banned. According to the World Organization for Animal Health, “*The following low welfare methods should not be used: chilling with ice in holding water, carbon dioxide (CO₂) in holding water; chilling with ice and CO₂ in holding water; salt or ammonia baths; asphyxiation by removal from water; exsanguination without stunning.*” This should be applied to fisheries.

In terms of bycatch and ghost gear, we recommend 1) modifying gear to improve selectivity and 2) using biodegradable elements in commercial fishing gear.

For more details please see our full report:

<https://static1.squarespace.com/static/5e4ff4ae6791c303cbd43f67/t/623a013263d3f057c9819326/1647968574686/Key+Welfare+Recommendations+for+Marine+Capture+Fisheries++%281%29.pdf>

■ GSSI response

Following the comments by Aquatic Life Institute, no changes were made to the conclusion on IRF’s alignment with D1.01. The comments appear to relate more generally to the inclusion of animal welfare in IRF’s standard and GSSI’s Global Benchmark Tool’s Framework, which is not the subject of the IRF Public Consultation. IRF has been informed of these comments for consideration in future standard revisions.

While GSSI appreciates Aquatic Life Institute’s review and attention to the importance of animal welfare, IRF is reviewed against the current version of the Global Benchmark Tool (version 2.0, 2021). Considerations outlined by the Aquatic Life Institute do not fall within the scope of Component D.1.01 and does therefore not impact IRF’s status of alignment with D.1.01.

At GSSI, we are dedicated to continuous improvement and value your feedback on integrating animal welfare into our benchmarking tools. We will certainly consider this in our upcoming review cycle. Meanwhile, we recommend that stakeholders advocate directly with the FAO, as this can lead to broader changes that will then influence our benchmarks. Thank you for your commitment to responsible seafood production and fisheries management.

Conclusion on GSSI Essential Component D.1.01

Conclusion:

The IRFM Standard v2.1 is in alignment because it requires that a structured fisheries management system is adopted and implemented (clause 1.1.1) and that Appropriate measures for the conservation and sustainable use of the “stock under consideration” shall be adopted and effectively implemented by the competent authorities. The competent authorities are the designated authorities governing Icelandic fisheries, including the Units of Certification for all IRF recognised fisheries. The Ministry of Fisheries and Agriculture in Iceland is the principal management organisation responsible for Icelandic fisheries. Its overall responsibilities include fisheries management, research, conservation and control. Importantly, it is the Fisheries Ministry who decides on the annual TACs upon receiving advice from the Marine Research Institute (MRI). The Directorate of Fisheries (Fiskistofa) undertakes monitoring of the Icelandic fisheries to ensure that all rules are being followed. Other major international scientific institutions that Iceland collaborates with for fishery stock management advise include ICES and relevant Regional Fisheries Management Organisations.

REFERENCES

- [IRF Fisheries Management Standard 2.1](#)
- [Government of Iceland](#)