



# GLOBAL BENCHMARK TOOL

# GSSI Benchmark Report

**Scheme: Iceland Responsible Fisheries (IRF)**

**Scope: Fisheries Management Standard (version 2.1, 2016)**

**Date: 17/02/2025**

# G S S I B E N C H M A R K R E P O R T

## STATEMENT OF RECOGNITION

Scheme	Iceland Responsible Fisheries (IRF)
Scope	Fisheries Management Standard (version 2.1, 2016)
Date	17/02/2025

The Global Sustainable Seafood Initiative (GSSI) Steering Board recognizes the Iceland Responsible Fisheries (IRF) to be in alignment with all applicable essential components of:

A	Section A. Governance of Seafood Certification Schemes
B	Section B. Operational Management of Seafood Certification Schemes
D	Section D. Fisheries Certification Standards

Thereby, GSSI considers the above seafood certification scheme to be in alignment with the FAO Guidelines for the Ecolabelling of Fish and Fishery Products from Marine/Inland Capture Fisheries.

This Report lists evidence of alignment with applicable GSSI Essential Components and GSSI Supplementary Components, where implemented.

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<i>C.1 Evidence of Alignment</i>			








# G S S I B E N C H M A R K R E P O R T

## SCHEME OVERVIEW

<b>Scheme name</b>	Iceland Responsible Fisheries
<b>Standard</b>	Fisheries Management Standard, version 2.1
<b>Headquarters location</b>	Reykjavík, Iceland

# G S S I B E N C H M A R K R E P O R T

## FROM APPLICATION TO RECOGNITION

	1 ↓	Application Received	The Benchmark Process begins once a Scheme Owner decides to apply for recognition and contacts the Secretariat, who provides an overview of the process.
	2 ↓	Desktop Review	This step helps to assess the Scheme Owner's capability to proceed and successfully complete the Benchmark Process within the expected timeframe.
	3 ↓	Office Visit	The Office Visit may be conducted by the Process IE or both IEs, depending on the outstanding issues of the Desktop Review.
	4 ↓	Benchmark Committee Meeting	The Benchmark Committee acts as the 'Quality Assurance' for the work undertaken by the IE team in the Desktop Review and Office Visit.
	5 ↓	Public Consultation	If recognition is recommended by the Benchmark Committee, the Scheme Owner's approval is required to publish the Benchmark Report for a four-week Public Consultation.
	6 ↓	Recognition Decision by Steering Board	The Steering Board is briefed by the Steering Board Liaison on the Benchmark Report and the Benchmark Committee's recommendation for recognition.
	7	Monitoring of Continued Alignment	GSSI ensures continued alignment of recognized schemes with GSSI Essential Components through an annual reporting process of relevant changes.

Read more about the steps to recognition [here](#).

# G S S I B E N C H M A R K R E P O R T

## WHO IS INVOLVED



Scheme Representative

Sigrid Merino, CEO, Iceland Responsible Fisheries



Independent Expert (Process)

Aimee Russillo



Independent Expert (Technical)

Iain Pollard / Charlie Horsnell



Steering Board Liaison

Trent Hartill



GSSI Secretariat Representative

Georgia Armitage, Benchmarking Manager



Steering Board Members



Benchmark Committee Members

Bruno Sechet, Section A and B  
Carlos Sonderblohm, Section D

# G S S I B E N C H M A R K R E P O R T

## EVIDENCE OF ALIGNMENT

A	Section A. Governance of Seafood Certification Schemes
B	Section B. Operational Management of Seafood Certification Schemes
C	Section C. Aquaculture Certification Standards
D	Section D. Fisheries Certification Standards

**SECTION A.  
GOVERNANCE OF  
SEAFOOD  
CERTIFICATION  
SCHEMES**





# A.1 EVIDENCE OF ALIGNMENT

## A.1 EVIDENCE OF ALIGNMENT

A.1.01	
GSSI Component	Guidance
The Scheme Owner is a legal entity, or an organization that is a partnership of legal entities, or a government or inter-governmental agency.	<p>Scheme Owner is an entity which could be held legally responsible for its operations.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> <li>- an official document showing registration with legal authorities and current legal status of organization. Examples include incorporation papers, statutes, business licenses and registration with tax authorities.</li> </ul> <p>For government Scheme Owners, clear lines of responsibility and authority on decision making should be identified.</p> <p>Pre-application to require scheme to identify legal registered entity or lead government agency/department.</p>
Conclusion	References
The IRFM Certification Programme is in alignment because it is a legally established foundation operating on a cost basis as a non-profit organisation, according to the Icelandic law No. 33/1999 on non-profit organisations. It owns and operates the brand of Iceland Responsible Fisheries. The Foundation was established in February 2011 and took over the operation and management of the IRF certification programme from the Fisheries Association of Iceland.	<ul style="list-style-type: none"> <li>• <a href="#"><u>IRFF Charter</u></a></li> </ul>

### A.1.01.01

GSSI Component	Guidance
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# A.1 EVIDENCE OF ALIGNMENT

## A.1.01.01

<p>The Scheme Owner has insurance or reserves to cover the operations of the scheme.</p> <p>Note: This does not apply to government-run schemes as they are self-insured.</p>	<p>The Scheme Owner shall be able to demonstrate that it has evaluated the risks arising from its activities and that it has adequate arrangements (e.g. insurance and/ or reserves) to cover liabilities arising from its operations in each of its fields of activities and the geographic areas in which it operates. (adapted ISO 17021 5.3 and ISO 17065 4.3)</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> <li>- system for business risk assessment, insurance policy,</li> <li>- clauses in accreditation body and/or certification body contracts addressing liability.</li> </ul>
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Conclusion	References
<p>The IRFM Cert. Prog. is in alignment because supporting documentation show reasonable assessment and planning for material risks including general liability. Approval of Certification Bodies requires them to carry adequate insurance for conducting audits and certification decisions for IRFF. The contractual agreement between SO and CB Clause 3.1 requires activities, employees and sub-contractors activities be sufficiently covered. Financial planning includes interests from the capital invested by the founding organizations in 2011 as well as annual membership fee from suppliers holding the chain of custody certificate and users of the IRF logo of origin.</p>	<ul style="list-style-type: none"> <li>• <u><i>Constitution (Charter) of IRF</i></u></li> </ul>

## A.1.02

GSSI Component	Guidance
<p>The Scheme Owner is not directly engaged in the operational affairs (auditing or certification) of the certification or accreditation program.</p>	<p>Scheme Owner is not directly engaged in auditing, certification or accreditation activities in order to ensure freedom of commercial or financial pressure of assurance processes and decision making. This does not include complaint resolution or performance reviews.</p> <p>Examples of evidence for scheme alignment:</p>

# A.1 EVIDENCE OF ALIGNMENT

## A.1.02

- impartiality policy, impartiality clauses in certification body and accreditation body contracts, management control procedures

### Conclusion

The IRFM Cert. Prog. is in alignment because it is not directly engaged in the audit/ evaluation of fisheries. Assessments are conducted by an independent and qualified Inspection Body accredited to ISO/IEC Guide 17065:2012 requirements. Certification requirements specify the requirements and conditions that a Certification Body (CB) must fulfill in order to operate an approved certification scheme for the purposes of providing independent evaluation of a fishery to the Icelandic Responsible Fisheries Foundation (IRFF) Certification Scheme. IRFF may review reports as part of the annual performance review and to confirm consistency with Certification Requirements, but, does not take part in any aspect of the certification decision process.

### References

- [IRFF Charter](#)
- [ToR of the Technical Committee](#)
- Clause 2.2

## A.1.03

### GSSI Component

The Scheme Owner operates to a documented set of governance policies and procedures specifying at least the following:

- Board or governance body election or appointment process,
- Process to facilitate participation of stakeholders
- Board or governance body representation and Terms of Reference,
- Member categories (where applicable),
- Income generation or funding processes,
- An organizational structure,
- The decision making processes of each governance body,

### Guidance

The Scheme Owner has policies/procedures available covering all aspects in this Essential Component except Member categories if not applicable.

Examples of evidence for scheme alignment:

- statutes and by-laws, organizational chart, internal procedures, job descriptions, conflict of interest statements, quality assurance procedures or manual.

# A.1 EVIDENCE OF ALIGNMENT

## A.1.03

<ul style="list-style-type: none"> <li>- Key personnel roles (responsibility and authority),</li> <li>- Managing conflict of interest, and</li> <li>- quality assurance program.</li> </ul>	<ul style="list-style-type: none"> <li>- online process document for submission of input, governance body selection process and stakeholder composition, review of previous stakeholder inputs and verify if/how this reached top governance.</li> </ul>
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Conclusion	References
<p>The IRFM Cert. Prog. is in alignment because they have documented policies and procedures covering all of the GSSI listed requirements in various documents including; IRFF charter, IRF homepage and in documents, which include, amongst other ToR for the Technical Committee 2.9, internal documents including rules of procedure for the Board, organisational structure, description of personnel roles, conflict of interests forms and so on.</p> <p>Evidence of implementation viewed in office visit.</p>	<ul style="list-style-type: none"> <li>• <a href="#"><u>IRFF Charter</u></a></li> <li>• <a href="#"><u>Organizational Chart</u></a></li> <li>• <a href="#"><u>ToR Technical Committee</u></a></li> </ul>

## A.1.04

GSSI Component	Guidance
<p>The Scheme Owner makes information freely available about the scheme's ownership, governance structure, the composition, operating procedures and responsibilities of its governance bodies, standard-setting procedures and standards.</p>	<p>All applicable listed governance documents are easily accessible online, free or at cost of any printing and handling costs.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> <li>- applicable documents posted on website, easy to find and free to download.</li> </ul>
Conclusion	References
<p>The IRFM Cert. Prog. is in alignment because all applicable listed governance documents are found on the public website. The website includes information on: the scheme governance</p>	<ul style="list-style-type: none"> <li>• <a href="#"><u>About the IRF</u></a></li> <li>• <a href="#"><u>IRFF Constitution (Charter) of Iceland Responsible Fisheries Foundation, Version 1.1</u></a></li> </ul>

# A.1 EVIDENCE OF ALIGNMENT

## A.1.04

structure, ownership, standards and standard-setting procedure, composition, operating procedures and responsibilities of its governance bodies. The contact points for further information are readily available if requested.

- [IRFF Contact us](#)
- [IRFF Organisational Chart, Version 1.8](#)
- [IRFF Standards](#)
- [Technical Committee: Terms of Reference – Rules of Procedure, 2016](#)
- [ToR Technical Committee](#)

## A.1.05

GSSI Component	Guidance	
The Scheme Owner has a defined scope for certification under its standard.	<p>The Scheme Owner clearly defines the scope that the standard covers, for example which species, production systems/gear type, geographical locations, company structures (single units, groupings of sites/boats, smallholder groups/small-scale fisheries, subcontractors, product categories, certifiable units in the chain of custody etc.).</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> <li>- explicit scope definition in standards, certification methodology/requirements, objectives.</li> <li>- contracts with accreditation bodies, certification bodies and/or certified operations</li> </ul>	
Conclusion		References
<p>The IRFM Cert. Prog. is in alignment because it clearly defines its scope for certification under its scheme. IRFM Standard: "The scope of the Programme and of the standards is limited to: the fisheries of Icelandic vessels within the Icelandic EEZ, the pelagic fisheries of shared stocks by Icelandic vessels in the high seas. The scope of the scheme is fisheries of Icelandic vessels within Icelandic EEZ and the pelagic fisheries of shared stocks by Icelandic vessels."</p>		<ul style="list-style-type: none"> <li>• <a href="#"><u>Responsible Fisheries Management Standard</u></a></li> </ul>

# A.1 EVIDENCE OF ALIGNMENT

A.1.06		
GSSI Component	Guidance	
The Scheme Owner has defined objectives for its scheme that aim for responsible use of the resource and has publicly available performance indicators related to scheme objectives.	<p>Objectives for the scheme are defined and documented. The defined objectives cover all environmental resources covered in the standards; this would normally be for example fish populations, habitats and ecosystems, water, possibly energy, endangered species and biodiversity within the impact zone. Indirect use of resources for e.g. feed production may also be addressed. For each objective and associated resources, performance indicators are defined, documented and publicly available.</p> <p>Examples of evidence for scheme alignment: - standard document with objectives and thresholds.</p>	
Conclusion	References	
<p>The IRFM Cert. Prog. is in alignment because objectives are clearly defined in IRFM standard (p4); "The purpose of the Programme is to provide the fishing industry with a "Certification of Responsible Fisheries Management" at the highest level of market acceptance."</p> <p>Certification to requirements under the Programme will demonstrate a commitment that will communicate to customers and consumers the responsibility of fishermen and fisheries management authorities and the provenance of Icelandic fish."</p> <p>Virtual office visit review of evidence of implementation</p>	<ul style="list-style-type: none"> <li>• <a href="#"><u>Responsible Fisheries Management Standard</u></a></li> </ul>	

# A.1 EVIDENCE OF ALIGNMENT

## A.1.07

GSSI Component	Guidance	References
<p>The Scheme Owner ensures that all types of fishery/aquaculture operations within the scope of its scheme can apply for certification, regardless of their scale, size or management arrangements, and has not set an upper limit on the number of operations that can be certified.</p>	<p>The Scheme Owner application process ensures equal access within the defined standard scope whether directly, sub-contractors or outsourcing (i.e. to certification body).</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> <li>- application process selection criteria do not discriminate on factors such as size, scale, management, minimum number of operators.</li> <li>- review declined applications are due to other non-discriminatory issues (i.e. incomplete, out of scope)</li> </ul>	<ul style="list-style-type: none"> <li>• <a href="#"><u>Responsible Fisheries Management Standard</u></a></li> </ul>
<p><b>Conclusion</b></p>		
<p>The IRFM Cert. Prog. is in alignment because nothing in the requirements for certification of fisheries excludes any normal fishing operation. No exclusions are made except for those deemed prohibited (illegal). There are no declined applications based on discriminatory factors in requirement. See Standard p3. "This Standard... Is non-discriminatory, [it] does not create unnecessary obstacles to trade and allows for fair trade and competition." The only exclusion is of prohibited fisheries, see clause 1.1.4 in IRFM Standard. Members of the IRFF Board represent all types of marine fisheries conducted in Iceland.</p>		

## A.1.07.01

GSSI Component	Guidance
<p>The Scheme Owner has procedures for taking into account the special circumstances of data</p>	<p>The Scheme Owner processes and policies reduce barriers or promote access of small scale enterprises. This may include specific small scale standards or exemptions that do not lower the requirements of the standards themselves.</p>

# A.1 EVIDENCE OF ALIGNMENT

## A.1.07.01

deficient and/ or small-scale fishery/ aquaculture operations.	Examples of evidence for scheme alignment: - separate specific standard for small scale enterprises or programs such as capacity building and access to finance targeted to small scale enterprises. Policies may include sliding scale fees or simplified reporting templates.
<b>Conclusion</b>	
<p>The IRFM Cert. Prog. is in alignment because small boat fisheries are founders and represented in the governance of IRFF as evidenced in Constitution and Technical Committee.</p> <p>The special 'summer coastal fisheries' and, by some means, part of the small boat fisheries may be considered small scale.</p> <p>All clauses are relevant as these smaller fisheries are identified, specified, regulated and represented.</p>	<b>References</b> <ul style="list-style-type: none"> <li>• <a href="#"><u>About IRF foundation</u></a></li> <li>• <a href="#"><u>Responsible Fisheries Management Standard</u></a></li> </ul>

## A.1.08

<b>GSSI Component</b>	<b>Guidance</b>	
The Scheme Owner does not have mandatory requirements that require a fishery / aquaculture operation to be certified in order to access any markets.	Application selection process and certification methodology/ requirements do not include mandatory requirements for access to markets. Absence of such requirements indicates alignment.	
<b>Conclusion</b>		<b>References</b>
The IRFM Cert. Prog is in alignment because there are no mandatory requirements for certification for market access. Standard p3.The Standard ....Is voluntary in nature and market-		<ul style="list-style-type: none"> <li>• <a href="#"><u>Responsible Fisheries Management Standard</u></a></li> </ul>



# A . 1 E V I D E N C E O F A L I G N M E N T

## A.1.08

driven....• Is non-discriminatory, does not create unnecessary obstacles to trade and allows for fair trade and competition.

## A.1.09

### GSSI Component

The Scheme Owner undertakes a fully documented annual management review of scheme performance, including its assurance program, and the performance of certification and accreditation bodies. The results of the review are used to revise its operating procedures and practices, where necessary.

### Guidance

System exists for an annual documented management review that covers scheme performance, assurance program, accreditation bodies and certification bodies as applicable. A documented system to use the results of the review to revise operating procedures and systems is available.

### Conclusion

The IRFM Cert. Prog. is in alignment because the managing director of IRF Scheme, produces an annual report for the Annual Board meeting in which operation of the Scheme is scrutinized and reviewed.

As part of the review and ahead of the annual report, an annual review is held with the CB to review past performance including:

- Review of last CB accreditation audit findings. Specific to IRFF
- Staff and resources – changes and additions
- Status of certificates for fisheries and CoC
- Outcomes of fisheries assessments previous 12 months
- Programme for CoC (new assessments, reporting on certificate maintenance items, challenges, points to note, etc..)
- Review of any CB complaints/appeals outcomes and actions

### References

- *Responsible Fisheries Management Standard*
- ICELAND RESPONSIBLE FISHERIES FOUNDATION CB PERFORMANCE REVIEW AND MEETING 8<sup>th</sup> of November 2024 – internal document

# A.1 EVIDENCE OF ALIGNMENT

## A.1.09

- Programme for procedural changes, revisions..
- Communication items arising from the above over the next 6 months

Monitoring follow up: evidence of implementation will be reviewed the end of September 2025

### A.1.09.01

GSSI Component	Guidance
<p>The Scheme Owner ensures the management review is carried out with the involvement of directly affected stakeholders and addresses any issues of concern raised by stakeholders.</p>	<p>Directly affected stakeholders are defined by the Scheme Owner. A system exists to ensure sufficient time and opportunity for all directly affected stakeholders to provide input. Submissions are reviewed and addressed transparently.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> <li>- documented stakeholder identification,</li> <li>- examples of invite and information system to inform stakeholders how to submit issues of concern or general input,</li> <li>- documented process for handling, reviewing and responding to issues raised.</li> </ul>
<p>Conclusion</p>	<p>References</p>

# A . 1 E V I D E N C E O F A L I G N M E N T

## A.1.09.01

The IRFM Cert. Prog. is in alignment because directly affected stakeholders are actively involved at several levels. Governance and technical committee is to ensure inclusion of their perspectives on different aspects of the system. Issues of concern can be raised through them as well as at the Annual Meeting.

- [About IRF foundation](#)

# A . 2 E V I D E N C E O F A L I G N M E N T

## A.2 EVIDENCE OF ALIGNMENT

A.2.01		
GSSI Component	Guidance	
<p>The Scheme Owner has a publicly available policy governing use of symbols, logos and claims. This policy includes the provision of written authorizations or licenses to use the scheme's mark/claim/logo only when the facility and products have been certified to the relevant standard.</p> <p>Any misleading use or statement by the certified entity regarding the status or scope of its certification, shall be prohibited.</p>	<p>Scheme Owner has a policy that covers use of symbols, logos and claims if applicable to its system. The policy is public, easily accessible and available in languages appropriate to geographic scope.</p> <p>Contracts or formal agreements with the certified entity specify legal responsibility for the use of the scheme's mark/claim/logo only when the facility and/or product are certified.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> <li>- publicly available Logo Use and Claim statement which is explicitly referenced in formal arrangement with certified entity.</li> <li>- other examples include: direct logo agreements, licensing or membership agreements with the Scheme Owner or its commercial partner or indirect contracts/agreements through the certification body.</li> <li>- in the latter case the requirements to include this in contracts/ agreements should be outlined in certification requirements/ methodologies or similar contract/agreement between the Scheme Owner and the certification body.</li> </ul>	
Conclusion	References	
<p>The IRFM Cert. Prog. is in alignment because the scheme has strict rules on the use of the certification mark for certified organisations, and those applying to use the mark have to accept that [certain terms] by signing. The policy/rules on the use of the certification mark are available online at the IRFF website.</p>	<ul style="list-style-type: none"> <li>• <a href="#"><u>Rules of Use of the Certification Mark</u></a></li> </ul>	

# A . 2 E V I D E N C E O F A L I G N M E N T

## A.2.01

The IRFF certification mark is copyright protected by law. The rules are available in English, German, Spanish and French. Review of documents included "Use of Mark policy 1.0", dated 13 July 2015. This policy is accessible on the web and available in key languages

## A.2.02

GSSI Component	Guidance	
<p>Through the claims policy, the Scheme Owner ensures copyright is protected and that symbols, logos and claims are only applied to activities that are within the scope of certification, do not overstate or mislead users relative to the defined scope, and are relevant to that scope.</p>	<p>Claims policy (see A.2.01), contracts and MoUs ensure that logo use and claims are copyright protected and are restricted to activities within the scope of certification. This includes symbols, logos and claims on and off product, such as marketing materials, consumer brochures and the internet.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> <li>- legal registration of logos and seals with applicable agents.</li> <li>- claims policy covers clear scope for on and off product use, claims and statements including policy for misuse.</li> <li>- contractual relationships specify explicitly adherence to claims policy.</li> <li>- records of applications for use of claims, records of complaints or violations.</li> </ul>	
Conclusion	References	
<p>The IRFM Cert. Prog. is in alignment because they have rules on the use of the certification mark for certified organisations and those applying for using of the mark have to accept that by signing. The policy and rules on the use of the certification mark is</p>	<ul style="list-style-type: none"> <li>• application for the use of the certification mark</li> <li>• application form filled out by Icelandic fishing companies that joined our programme and were granted the use of our certification mark</li> <li>• application for the use of the certification mark</li> <li>• application form filled out by Icelandic fishing companies that joined our programme and were granted the use of our certification mark</li> </ul>	

# A . 2 E V I D E N C E O F A L I G N M E N T

## A.2.02

available online at the IRF website. The IRF certification mark is copyright protected by law.

Virtual office visit - Oct 2013 trade mark registers office letter and internal applications reviewed

copyright legal registrations online  
<https://www.hugverk.is/en/leit/trademark/V0072146>

- application for the use of the certification mark
  - application form filled out by Icelandic fishing companies that joined our programme and were granted the use of our certification mark
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- Application for the use of the certification mark
  - application form filled out by Icelandic fishing companies that joined our programme and were granted the use of our certification mark
- *Rules of Use of the Certification Mark*

## A.2.02.01

GSSI Component	Guidance
The Scheme Owner has data to substantiate claims about meeting its scheme objectives, e.g. with impacts data	The Scheme Owner ensures claims (e.g. in a publications or on a website) are accurate and supported by data such as through outcome or impacts reports. This could be through a system and/or assignment of responsibility to check claims or statements made by the scheme itself.  Examples of evidence for scheme alignment:

# A . 2 E V I D E N C E O F A L I G N M E N T

## A.2.02.01

or monitoring and evaluation results.

- Review claims by schemes of meeting its objectives (this may be in the form of an annual update, 10 year success booklets, internet news, presentation materials for fairs, or other advertising materials).
- For such claims, a documented assessment of the publicly available in the form of outcome or impact reports supporting the claim/results.
- ISEAL Improvement criteria

### Conclusion

The IRFM Cert. Prog. is in alignment because scheme objectives are based on international principles and stated on Article 2 of Charter and page 4 of Standard.

This is covered in the standard management plan, during the audit, checked against MRI (annual status reports and stocks), ministry, etc. and other external scientific bodies to approve.

Annual surveillance audits from CB's, are reviewed and analyzed so not necessarily called a "M&E system", but the purpose of criteria is addressed with stated objectives and ongoing monitoring

### References

- *3rd Surveillance report Cod*
- 3rd Surveillance Assessment Report for Cod added as an example, there are six more, for the rest of the certified fisheries.
- *Responsible Fisheries Management Standard*
- page 4, standard management plan
- *IRFF Constitution, version 1.1*

## A.2.03

### GSSI Component

The Scheme Owner requires certificates to include, at a minimum:

### Guidance

The issuer of the certificate ensures that minimum information enables identification and contact information of assurance process parties (accreditation body, Scheme

# A . 2 E V I D E N C E O F A L I G N M E N T

## A.2.03

- the identification of the Scheme Owner;
- identification of the accreditation body;
- the name and address of the certification body;
- the name and address of the certification holder;
- the effective date of issue of the certificate;
- scope of certification
- the term for which the certification is valid;
- signature of the issuing officer.

Owner and certification body), unique name and address of certified entity, date and validity, scope and signature of issuing officer.

Examples of evidence for scheme alignment:

- mandatory normative documents such as certification requirements/methodologies with certification bodies that cover all points listed.
- mandatory certificate template includes all points listed.
- review examples of certificates.

### Conclusion

The IRFM Cert. Prog. is in alignment because certification requirements are included in, clause. 7.7.1:

Where a decision to certify has been determined, the Certification Body shall award the Applicant a formal Certificate in accordance to an agreed template. The Certificate shall detail:

- Applicant(s) name address
- Unit of Certification
- Management Authority(ies)
- Species
- Geographic Region
- Gear Type
- Issue Date (This is the Certification Decision Date)
- Surveillance Date(Annual)
- Expiry Date (Five years less a day from the Issue Date)

### References

- [Certification requirements](#)
  - clause 7.7.1 Certification Requirements
- Internal Global Trust Procedures Manual
  - quality procedures, confidential document
- 29351-02 GTC Fisheries RFM Application to Certification Procedure.docmFeb122024115909.pdf



# A . 2 E V I D E N C E O F A L I G N M E N T

## A.2.04

GSSI Component	Guidance
<p>Where a seafood ingredient can be certified, the Scheme Owner requires that at least 95% of the total seafood ingredient within a product is of certified origin in order for the scheme’s logo or certification mark to be used. Where there is less than 95%, the scheme requires that the percentage must be stated and the logo or certification mark cannot be used.</p>	<p>The Scheme Owner specifies minimum percentages for use of logo and claims in mixed products. This states that at least 95% of the total seafood ingredient that can be certified, for unqualified claims and for lower percentages, a qualifying statement of the percentage must be used in conjunction with the logo or claim.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> <li>- normative documents such as scope definition, certification requirements/ methodologies or other agreements between the Scheme Owner and certification body that define these percentage claims.</li> <li>- logo use and claims policy which is explicitly referenced in formal contracts and agreements with certification bodies and/or certified entities.</li> <li>- review examples of issued certificates where these are public or product information in online databases of certified products where these are available.</li> <li>- if the Scheme Owner does not allow mixed product, then this Essential Component is aligned.</li> </ul>
Conclusion	References
<p>The IRFM Cert. Prog. is in alignment because mixed products cannot carry the label - so strict are the requirements. Where certified and non-certified seafood inputs are mixed they are not eligible for carrying the official Certified label as coming from a responsibly managed fishery under this programme.</p> <p>Chain of Custody Standard v3 March 2019: page 11. clause 2.3 Where certified and non-certified seafood is mixed the final product is not eligible for carrying the IRFM certification mark with the following exception: For compound products including ready meals, these may contain non-certified seafood ingredients within the final product where the non-certified seafood ingredients shall be 5% or less by weight of the total seafood ingredients in the final product</p>	<ul style="list-style-type: none"> <li>• <a href="#"><u>Chain of Custody Standard</u></a></li> </ul>

# A . 3 E V I D E N C E O F A L I G N M E N T

## A.3 EVIDENCE OF ALIGNMENT

A.3.01		
GSSI Component	Guidance	
<p>The Scheme Owner shall have a process and governance structure in place for standard setting, reviewing, revising, assessing, verifying and approving.</p> <p>The process shall be carried out with the participation of technically competent persons (e.g. independent experts, and open to suitably qualified representatives of all key stakeholders).</p> <p>The information about the process and organization for standard development and revision shall be made publicly available.</p> <p>It is the Scheme Owners responsibility to ensure a balanced participation by stakeholders.</p>	<p>The Scheme Owner clearly identifies the responsible person for assigning the management of the standard setting process. In addition, the procedure, organizational chart or related TORs/contracts with external bodies identifies where each of the tasks (setting, reviewing, revising, assessing, verifying and approving standards) are assigned to. This documentation clearly indicates where the overall responsibility for the standard setting process lies.</p> <p>Procedures defining the process of standard development and revision are easily available for the public, such as online, in appropriate languages.</p>	
Conclusion		References
<p>The IRFM Cert. Prog. is in alignment because organizational chart and Technical Committee Terms of reference 1.0 dated 14 July 2015, outlines requirements and responsibilities and is publicly available. The Technical Committee has responsibility to write and agree a Specification (standard) for the certification of responsible fisheries in Iceland and an associated Chain of Custody Specification (standard) as well as the development, revision and interpretation of both specifications.</p> <p>They are responsible to conduct reviews of the standards at least every five years.</p>		<ul style="list-style-type: none"> <li>• <a href="#"><u>Organisational Chart version 1.9 (march 2023)</u></a></li> <li>• <a href="#"><u>ToR Technical Committee</u></a></li> </ul>

# A . 3 E V I D E N C E O F A L I G N M E N T

## A.3.02

GSSI Component	Guidance	References
<p>The Scheme Owner identifies a central point of contact for standards-related enquiries and for submission of comments. The Scheme Owner makes contact information for this contact point readily available on its website.</p>	<p>Contact details for standard related enquiries and comments are easily available for the public, including online. This can be the same as a general contact point, but should explicitly identify standard related scope.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> <li>- review website and verify that point of contact responds to enquiries.</li> <li>- review past enquiries and submitted comments</li> </ul>	<ul style="list-style-type: none"> <li>• <a href="#"><u>IRFM Standard 60 days public comment period</u></a></li> <li>• <a href="#"><u>Responsible Fisheries Management Standard</u></a></li> </ul>
<p><b>Conclusion</b></p>		
<p>The IRFM Cert. Prog. is in alignment because a general contact point is specified on website, as well as a publicly available process throughout Standard Consultation Processes. IRFF have a clear separate central point. In general there are open comment mechanisms on the website as well as personal contact points, they are not specific to standards related enquiries but enquiries related to standards received outside the consultation period are, in accordance with procedure, sent to the chair of the Technical Committee.</p>		

## A.3.03

GSSI Component	Guidance
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# A . 3 E V I D E N C E O F A L I G N M E N T

## A.3.03

The Scheme Owner strives for consensus decisions on the content of the standard.

Where consensus cannot be achieved, the Scheme Owner defines criteria in advance to determine when alternative decision-making procedures should come into effect and what the decision-making thresholds will be.

A mechanism is in place to assure a consensus decision is found where possible. In addition, the mechanism describes how decisions shall be made when a consensus is not possible. The mechanism assures that stakeholders are informed about this mechanism.

Examples of evidence for scheme alignment:

- internal procedures and/or quality handbook for standard setting and maintenance outlines decision making.
- meeting minutes/email correspondence.

Standard setting archives and draft standards and meeting minutes could verify that this mechanism was implemented during previous decision-making.

### Conclusion

The IRFM Cert. Prog. is in alignment because according to clause 2.6 ToR of the Technical Committee, decisions shall be taken based on majority votes of members of the IRFF Technical Committee. The chairman shall be entitled to a casting vote in the event of a tie.

TC ToR (14 July 2015) clearly outlines the process based on majority vote (not necessarily consensus) and process for tie to reach a decision. With balanced representation and mechanisms to ensure no single interest predominates, diverse viewpoints will be included in discussion and decision making. See review of meeting minutes for negotiated decisions.

### References

- [Majority Votes – ToR Technical Committee](#)
- Clause 2.6

## A.3.03.01

GSSI Component

Guidance

# A . 3 E V I D E N C E O F A L I G N M E N T

## A.3.03.01

The Scheme Owner’s decision-making process for standards development or revision ensures that no category of stakeholders has a majority vote in decision-making.

Standard owner voting procedure process ensures balance in decision making where no single category of stakeholder has a majority in decision making.

Examples of evidence for scheme alignment:  
 - internal procedures and/or quality handbook,  
 - previous voting from minutes if available.

### Conclusion

The IRFM Cert. Prog. is in alignment because the TC ToR (14 July 2015) clause 2.6 states that the ToR of the Technical Committee decisions shall be taken based on majority votes of members of the IRF Technical Committee. The chairman shall be entitled to a casting vote in the event of a tie. Each member has only one vote. 2.7 the IRF Technical Committee shall include a representative balance of interests so that no single interest predominates.

### References

- [Voting procedure ToR – Technical Committee](#)
- clause 2.6

## A.3.03.02

### GSSI Component

The Scheme Owner has procedures in place to ensure that directly affected stakeholders have the opportunity to be represented in decision-making.

### Guidance

The standard owner defines directly affected stakeholders, including certified entities and any active technical and/or stakeholder working groups. A procedure is in place, assuring and describing how directly affected stakeholders can be represented in decision-making. A mechanism is in place to inform directly affected stakeholders of this opportunity.

Examples of evidence for scheme alignment:  
 - stakeholder mapping, meeting minutes and email correspondence to verify if stakeholders have been informed.

# A . 3 E V I D E N C E O F A L I G N M E N T

## A.3.03.02

### Conclusion

The IRFM Cert. Prog. is in alignment because the directly affected stakeholders are members of the Board and the TC and are therefore represented in decision-making.

Review of actual members in internal meeting minutes.

### References

- [IRF Charter](#)
- [Tor Technical Committee - decision making representation](#)

## A.3.04

### GSSI Component

The Scheme Owner has a transparent process to assess and handle complaints based on a publicly available procedure for resolving complaints related to governance, scheme management, executive functions and standard setting. Decisions taken on complaints are disclosed at least to the affected parties.

### Guidance

Complaints procedure is documented and clearly outlines steps, timelines and responsibilities to address and resolve complaints.

The process for submitting a complaint – how and to whom – is public and easily understood. A process is in place to identify when and if the complaint is addressed and resolved.

Examples of evidence for scheme alignment:

- easily found complaint process and submission form online.
- documentation of existing complaints and their resolution.
- possibly request accreditation and certification bodies for previous submissions of complaints and resolution.
- request and cross check with any complaints from stakeholders.

### Conclusion

The IRFM Cert. Prog. is in alignment because there are special links and contact points during the consultation period when standards are under revision. Outside the consultation period ,complaints can be

### References

- [Complaints procedure 1.2](#)
- clauses 2.1, 2.4 and 2.5
- [disclosure of decisions](#)

# A . 3 E V I D E N C E O F A L I G N M E N T

## A.3.04

sent either through the general comment link or directly to the directing manager, who contact information is available for from the website.

Publicly available complaints procedure; V1.2. 22 March 2016:

2.1 The managing director is the contact point for all complaints, comments or enquiries relating to the operation

of the Scheme and shall forward those to the Chair of the Board.

2.4 Complaints, comments or enquiries regarding standards are received through a special contact point for that purpose only and announced especially during consultation periods.

2.5 The Technical Committee reviews complaints, comments or enquiries regarding standards.

During standard setting or revision process, see IRFF Setting/Revision Document 1.2 dated 22 March 2016:

4.11 A summary of substantive comments received during the public consultation period shall be made publicly available in a non-attributable way.

General comments or complaints outside of the consultation period are directed to the managing director, who would answer any substantial comment or complaint after consulting with the TC.

- [IRFF CoC Standard Setting/Revising Procedure, version 1.2](#)
- [IRFF Fisheries Standard Setting/Revising Procedure, version 1.2](#)
- [IRFM Standard - 60 days public comments period](#)

## A3.05

GSSI Component	Guidance
The Scheme Owner reviews standards at least every five years for continued	The Scheme Owner has a process in place for reviewing all standards to ensure continued relevance and meeting stated objectives. Relevance can include market uptake, stakeholder scope and

# A . 3 E V I D E N C E O F A L I G N M E N T

## A3.05

<p>relevance and for effectiveness in meeting their stated objectives and, if necessary, revises them in a timely manner.</p>	<p>support. Outcome and assessment reports can identify progress towards objectives. Review should be at least every five years after the publication of the current version.</p> <p>Example of evidence of alignment:</p> <ul style="list-style-type: none"> <li>- internal procedure, quality handbook, public work program.</li> <li>- monitoring and evaluation system.</li> <li>- public comments and consideration of reports for standard revisions.</li> </ul>
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Conclusion	References
<p>The IRFM Cert. Prog. is in alignment because according to clause 3.2 ToR of the Technical Committee, the TC are responsible to conduct reviews of the standards at least every five years.</p> <p>The standard, first issued in 2010 and revised in 2014 and 2016 parallel to its ISO accreditation, has now been formally revised and updated by the IRFF Technical Committee according to its formal five year review. The review of the standard began in October 2022 and the updated draft standard was agreed by consensus by the IRFF TC in December 2022. this slight delay in the last revision cycle was due to COVID and staffing changes - but approved by the TC</p>	<ul style="list-style-type: none"> <li>• <u>Standard review ToR</u></li> </ul>

## A3.06

GSSI Component	Guidance
<p>The Scheme Owner allows for comments on the standard to be submitted by any interested party at any time and considers them</p>	<p>The Scheme Owner has a permanent publicly available point of contact defined online for the submission of comments on the standard. This is not just during the development or revision process.</p> <p>A general point of contact online is acceptable for small schemes, as long as it explicitly states that all stakeholders can submit comments on the standard at any time. All comments on standards are considered in subsequent revision process.</p>



# A . 3 E V I D E N C E O F A L I G N M E N T

## A3.06

during the subsequent standards revision process.

Examples of evidence for scheme alignment:

- scheme’s website with form for submitting comments on standards.
  - internal procedure, quality handbook describing the receiving, filing and incorporation of submissions during the subsequent revision process.
- Review ongoing submissions by interested parties on file.

### Conclusion

The IRFM Cert. Prog. is in alignment because during standard consultation process IRFF has a clear, separate, central point. In general there is an open comment mechanism on the website as well as personal contact points, they are not specific to standards related enquiries but enquiries related to standards received outside the consultation period are, in accordance with procedure, sent to the chair of the Technical Committee.

Complaint procedure Version 1.2 22 March 2016 2.5, states that; Outside consultation period the managing director is the contact point for complaints, comments or enquiries regarding the standards and shall forward those to the Chair of the Technical Committee.

2.6 further states that the Technical Committee reviews complaints, comments or enquiries regarding standards. The Technical Committee shall address these, as appropriate, and respond within a 28 day period.

### References

- [Accessible mechanism](#)
- [Iceland Management Fisheries Management Specification \(IRFM Standard\)](#)
- [IRFF, Standard Setting/Revising - Procedure, Version 1.2](#)
- [IRFM Standard - 60 days public comments](#)
- [IRF Website - enquiries](#)

## A3.07

GSSI Component

Guidance

# A . 3 E V I D E N C E O F A L I G N M E N T

## A3.07

The Scheme Owner keeps on file for a period of at least one full standards revision the following records related to each standard development or revision process:

- policies and procedures guiding the standard setting activity;
- lists of stakeholders contacted;
- interested parties involved at each stage of the process;
- comments received and a synopsis of how those comments were taken into account; and
- all drafts and final versions of the standard.

The Scheme Owner has a mechanism in place to assure all records outlined remain on file for at least one full standards revision period.

Examples of evidence for scheme alignment:

- internal procedure, quality handbook describing records to be kept, document and retention policy.

Review the full range of records for the most previous standard development and revision process.

### Conclusion

The IRFM Cert. Prog. is in alignment because the ToR TC version 1.0 clause 2.12 covers the following; "A record shall be kept of TC meetings and decisions." This does not specifically denote information related to stakeholders contacted, comments, etc as noted in requirement.

This was verified in pilot office visit. General policy at IRFF is that all files will be kept indefinitely on file and in addition, as Icelandic not for profit, law requires seven years on files by default.

All records related to standards revision is kept on file at IRFF office indefinitely.

### References

- *ToR Technical Committee - Keeping record*

## A3.08

### GSSI Component

At the outset of a standard development or revision process, the Scheme Owner makes publicly available a summary of the process that includes:

- contact information and information on how to contribute to the consultation;

### Guidance

The Scheme Owner has a mechanism in place assuring that a summary of the process is made easily available for the public online at the outset of the process. This

# A . 3 E V I D E N C E O F A L I G N M E N T

## A3.08

– summary of the terms of reference for the standard, including the proposed scope, objectives and justification of the need for the standard;  
 – steps in the standard-setting process, including timelines and clearly identified opportunities for contributing; and  
 – decision-making procedures, including how decisions are made and who makes them.

includes Who and How to contribute, timeline, summary ToR and decision making (who and how).

Examples of evidence for scheme alignment:  
 – internal procedure/quality handbook describing elements and process of public summary.  
 – examples of availability of past or current information.

### Conclusion

The IRFM Cert. Prog. is in alignment because the required information is available at the outset of the standard revision process as outlined in IRFM's public process document. Version 1.2 Clause 4.5:

"At the outset of a standards writing/revision process, the SO makes publicly available a summary of the process that includes; a) Contact information and information on how to contribute to the consultation, b) Summary of the Terms of Reference (ToR) for the standard, including proposed scope, objectives and justification of the need for the standard, c) Steps in the standard-setting process, including time lines and clearly identified opportunities for contributing, and d) decision-making procedures, including how decisions are made and who makes them."

### References

- [Announcement public comment period](#)
- [Iceland Management Fisheries Management Specification \(IRFM Standard\)](#)
- [IRFF, Standard Setting/Revising - Procedure, Version 1.2](#)

## A3.09

GSSI Component	Guidance
The Scheme Owner or delegated authority	The Scheme Owner, or delegated authority, has mechanism to ensure participation of necessary technical experts and balance of different stakeholder perspectives in standard development

# A . 3 E V I D E N C E O F A L I G N M E N T

## A3.09

ensures participation by independent technical experts and enables balanced participation by stakeholders in the standard development, revision and approval process.

and maintenance. A balanced participation of stakeholders would include: fisheries/aquaculture management authorities, the fishing/aquaculture industry, fish workers organizations, fishing/aquaculture communities, the scientific community, environmental interest groups, fish processors/traders/retailers, aquaculture input providers such as feed providers, hatcheries/nurseries and possibly treatment providers, as well as consumer associations.

Examples of evidence for scheme alignment:

- internal procedure/quality handbook for standard development
- revision and approval processes that describe how balance is achieved, such as through stakeholder mapping, announcements and invitation.

Draft documents and meeting minutes/email correspondence indicate that during standard development, revision and approval processes of the past, independent technical experts participated, and a balanced participation by stakeholders was encouraged.

### Conclusion

The IRFM Cert. Prog. is in alignment because according to ToR TC, Clauses 2.7, The IRF Technical Committee shall include a representative balance of interests so that no single interest predominates and according to clause 2.9, The process of appointing members of the IRF Technical Committee shall include consideration of conflicts of interest.

The IRF Technical Committee shall include a representative balance of interests so that no single interest predominates. The IRF board appoints the Technical Committee for four years at a time after receiving suggestions from TC Chair and nominations from interested parties.

### References

- *ToR Technical Committee - participation of independent technical experts*
- Clauses 2.7, 2.8 and 2.9

# A . 3 E V I D E N C E O F A L I G N M E N T

A3.10	
GSSI Component	Guidance
<p>The Scheme Owner allows a period of at least 60 days for the submission of comments on the draft standard.</p>	<p>The Scheme Owner has a mechanism in place to assure a minimum of 60 days for comments on major changes of the draft standard.</p> <p>A Standard is considered to be a set of documents that provide rules and guidelines to achieve results and that include all normative documents used for the certification process. The Scheme owner shall define which documents are part of the standard.</p> <p>This may include standard governance and setting procedures, requirements for certification bodies and certified entities</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> <li>- internal procedure/quality handbook defining public comment period, what are considered major changes and what constitutes the standard</li> <li>- ToR</li> </ul> <p>Review previous comments and dates for submission on draft standards.</p>
Conclusion	References
<p>The IRFM Cert. Prog. is in alignment because the process outlines that it is publicly available for a 60 day time period. There is an initial general public consultation period of the process and the current standard:\</p> <p>4.4. When a decision has been made to revise standards it shall be announced in the appropriate media and participating stakeholders in IRFF shall be informed that prior to a formal review the present standards shall be available for a 30 day public and stakeholders comment period.</p>	<ul style="list-style-type: none"> <li>• <a href="#"><u>Announcement public comment period</u></a></li> <li>• <a href="#"><u>IRFF, Standard Setting/Revising - Procedure, version 1.2</u></a></li> <li>• Clause 4.7</li> </ul>

# A . 3 E V I D E N C E O F A L I G N M E N T

## A3.10

4.7. New/revised standards shall be publicly announced on IRFF's website for a 60 days consultation period for public and stakeholders review and comments.

This has been verified in the first standard developed which included 60 days for comments.

### A3.10.01

GSSI Component	Guidance
<p>The Scheme Owner requires at least two rounds for comment submissions on the draft standard by stakeholders, with one round of at least 60 days and the other of at least 30 days.</p>	<p>The Scheme Owner has a mechanism in place to ensure comment periods as per Supplementary Component.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> <li>- internal procedure/quality handbook defining public comment periods in line with Supplementary Component.</li> <li>- terms of reference review previous comments and dates for submission on draft standards.</li> </ul>
Conclusion	References
<p>The IRFM Cert. Prog. is in alignment because the standard setting/reviewing procedure Version 1.2. (22 March 2016) includes following clauses:</p> <p>4.4 When a decision has been made to revise standards it shall be announced in the appropriate media and participating stakeholders in IRFF shall be informed that, prior to a formal review, the present standards shall be available for a 30 day public and stakeholders comment period.</p>	<ul style="list-style-type: none"> <li>• 30 day public comment period</li> <li>• <a href="#"><u>RFM Chain of Custody Standard in collaboration with CSC (Alaska)</u></a></li> <li>• 60 day comment period</li> <li>• <a href="#"><u>IRFM Standard version 2.1</u></a></li> <li>• <a href="#"><u>IRFF, Standard Setting/Revising Procedure, Version 1.2</u></a></li> <li>• Clause 4.4 and 4.7</li> </ul>

# A . 3 E V I D E N C E O F A L I G N M E N T

## A3.10.01

## A3.11

GSSI Component	Guidance	Conclusion	References
<p>No later than the start of the comment period, the Scheme Owner publishes a notice announcing the period for commenting in a national or, as may be, regional or international publication of standardization activities and/or on the internet.</p>	<p>Timely announcements are made regarding the public comment period in appropriate channels so that they are easily available to relevant stakeholders. This can be online and/or in an appropriate publications. Dates should be clearly stated.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> <li>- internal procedure defining process.</li> <li>- previous announcements are dated and were published before the beginning of the comment period.</li> <li>- newsletters</li> <li>- record of publication on SO's website</li> </ul>	<p>The IRFM Cert. Prog. is in alignment because the Standard setting/reviewing procedure Version 1.2. (22 March 2016) includes the following:</p> <p>4.4 When a decision has been made to revise standards it shall be announced in the appropriate media and participating stakeholders in IRFF shall be informed that prior to a formal review the present standards shall be available for a 30 day public and stakeholders comment period.</p>	<ul style="list-style-type: none"> <li>• <u><i>IRFF, Standard Setting/Revising - Procedure, Version 1.2</i></u></li> <li>• Clause 4.4 and 4.7</li> </ul>

# A . 3 E V I D E N C E O F A L I G N M E N T

## A3.11

4.7 New/revised standards shall be publicly announced on IRFF’s website for a 60 days consultation period for public and stakeholders review and comments, and a notice sent to media and IRFF’s participating stakeholders announcing the consultation period.

- [IRFM Standard - 60 days public comments period](#)

## A3.12

GSSI Component	Guidance
<p>The Scheme Owner identifies all impacted stakeholders and ensures proactively that all can participate in the standard-setting process through a consultation forum or are made aware of alternative mechanisms by which they can participate.</p> <p>This includes stakeholders that are not well represented in consultations and disadvantaged stakeholders (small-scale operations and vulnerable groups).</p>	<p>The Scheme Owner has a mechanism in place to identify all impacted stakeholders. It makes sure that, when needed, alternative tools are in place to leverage potential barriers to participate.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> <li>- Stakeholder mapping including past participation</li> <li>- internal procedure/quality handbook defining public consultation process.</li> <li>- ToR. Review participation, communication and mechanisms/tools of past or current consultation.</li> <li>- meeting minutes, announcements, publications and or email communication indicate that the Scheme Owner is proactively seeking the input of specific stakeholder groups.</li> </ul>
Conclusion	References
<p>The IRFM Cert. Prog. is in alignment because the scheme is stronger than stated requirement in including directly affected stakeholders in governance and technical activities.</p>	<ul style="list-style-type: none"> <li>• <u><a href="#">IRF Charter</a></u></li> <li>• <u><a href="#">TC member profiles</a></u></li> </ul>



# A . 3 E V I D E N C E O F A L I G N M E N T

## A3.12

Virtual office visit review: stakeholder mapping was conducted when established in 2011 – 3 main groups which are represented in the governance bodies:

large fishers

small boat owners

fishery govt group which represents fishers, seaman, unions, processors, etc

TC revision of IRFF standard 2023 included all relevant stakeholders

## A3.13

GSSI Component	Guidance	
The Scheme Owner makes publicly available all comments received in the consultation respecting personal data protection.	All comments received during the public comment period are made publicly available without attribution or identifier. Examples of evidence for scheme alignment: - internal procedure/quality handbook describing policy, current or past public comment comments posted online.	
Conclusion	References	
The IRFM Cert. Prog. is in alignment because the IRFF Standard setting/reviewing procedure Version 1.2 dated 22 March 2016, includes Article 4.11., which states that a summary of substantive comments received during the public consultation period shall be made publicly available in a non-attributable way.  no comments have been received so there is not evidence of implementation	<ul style="list-style-type: none"> <li>• <u>Standard setting/reviewing procedure Version 1.2</u></li> <li>• Clause 4.11</li> </ul>	

# A . 3 E V I D E N C E O F A L I G N M E N T

A3.14	
GSSI Component	Guidance
The Scheme Owner takes into account in further processing of the standard, comments received during the period for commenting.	<p>The Scheme Owner has a process for considering all comments received during the public consultation on the standard. Comments which are integrated into the standard should be clearly identified.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> <li>- some sort of system (e.g. excel) for organizing, categorizing and responding to comments.</li> <li>- review past consultation system, comments and response taken.</li> </ul>
Conclusion	References
<p>The IRFM Cert. Prog. is in alignment because of the criteria outlined in the IRFF Standard setting/reviewing procedure Version 1.2. (22 March 2016) Article 4.9. The TC will consider all comments based on their content and objectiveness, with respect to providing an improvement in the effectiveness of the Responsible Fisheries Management Certification consistent with the overall objectives of IRFF.</p> <p>No comments were received so there is no evidence of implementation</p>	<ul style="list-style-type: none"> <li>• <a href="#"><u>IRFF, Standard Setting/Revising - Procedure, Version 1.2</u></a></li> <li>• Clause 4.9</li> </ul>

A3.14.01	
GSSI Component	Guidance
The Scheme Owner makes publicly available a synopsis of how these comments were	The Scheme Owner develops a summary of how comments were addressed, makes publicly available as well as sends to everyone who submitted comments.

# A . 3 E V I D E N C E O F A L I G N M E N T

A3.14.01	
addressed and sends the synopsis to all parties that submitted comments.	Examples of evidence for scheme alignment: <ul style="list-style-type: none"> <li>- system, internal procedure/quality handbook that describes how comments are summarized and made available publicly and to commenters,</li> <li>- review of current and past standard public consultation information flow including synopsis.</li> </ul>
Conclusion	References
<p>The IRFM Cert. Prog. is in alignment because IRFF Standard setting/reviewing procedure Version 1.2 (22 March 2016) includes the following:</p> <p>Article 4.11. A summary of substantive comments received during the public consultation period shall be made publicly available in a non-attributable way.</p>	<ul style="list-style-type: none"> <li>• <a href="#"><u>Example of Public Comment announcement</u></a></li> <li>• <a href="#"><u>IRFF, Standard Setting/Revising – Procedure, Version 1.2</u></a> <ul style="list-style-type: none"> <li>• Clause 4.11</li> </ul> </li> </ul>

A3.15	
GSSI Component	Guidance
<p>The Scheme Owner ensures that the standard is consistent with the following requirements:</p> <ul style="list-style-type: none"> <li>- only includes language that is clear, specific, objective and verifiable;</li> <li>- is expressed in terms of process, management and / or performance criteria, rather than design or descriptive characteristics; (ISO 59)</li> </ul>	<p>The Scheme Owner has a mechanism in place to review standards in respect to the listed requirements.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> <li>- internal procedure/quality handbook defining all list requirements.</li> </ul> <p>Some standards state these in their preamble as principles or references.</p>

# A . 3 E V I D E N C E O F A L I G N M E N T

## A3.15

- does not favor a particular technology, patented item or service provider; and (ISO 59)  
 - attributes or cites all original intellectual sources of content.

- review that this list was checked for the current standards  
 - review standards and if available mandatory checklists/audit manuals in respect to the listed requirements.  
 - review any available complaints relating to this requirement.

### Conclusion

The IRFM Cert. Prog is in alignment because the IRFF Standard includes on p 3: "The Standard...•Is practical, viable and verifiable." p 8: The normative documents which this Standard draws upon include: ...• ISO/IEC Guide 59 CODE of good practice for Standardization..." covering listed requirements.

### References

- *IRFF, Standard Setting/Revising, Procedure, Version 1.2*
- Page 3 & 8
- *Responsible Fisheries Management Standard*

## A3.16

### GSSI Component

As part of the standard development process, the Scheme Owner assesses the feasibility and auditability of requirements in the draft standard.

### Guidance

The Scheme Owner has a mechanism in place to test the feasibility (cost, time) and auditability (interpretation, consistency) of requirements prior to finalization of the standards.

Examples of evidence for scheme alignment:

- internal procedure, quality handbook, standard setting work plan.
- review assessment outcomes of past processes including revisions based on findings.

### Conclusion

The IRFM Cert. Prog. is in alignment because a validation assessment on feasibility and auditability was done when IRFF applied for certification of the standard. A repost was provided by AB and CB Checklist was also tested by CB and accreditation body.

### References

- *IRFF, Standard Setting/Revising.*

# A . 3 E V I D E N C E O F A L I G N M E N T

## A3.16

This is also required in the Procedure for Standard Revision. IRFF Standard setting/reviewing procedure Version 1.2 (22 March 2016), Clause 4.8; The final draft shall be validated by the Certification Body and Accreditation Body.

In the case of version 2.1 of the Standard, issued in 2023 such assessment was not necessary, because the revision of the Standard did not modify or add new the content. The revision and review consisted in making the format of the text better and merging articles.

Procedure, Version 1.2

- Clause 4.8
- Responsible Fisheries Management Standard

## A3.17

GSSI Component	Guidance
The Scheme Owner demonstrates that all criteria in the standard contribute to the standard's defined objectives.	<p>Criteria are related to how the Scheme Owner's objectives are met by identifying the acceptable performance. Often they are logically grouped around principles and objectives.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> <li>- comparison of the Scheme Owner performance indicators with the standard's criteria.</li> <li>- monitoring and evaluation system of the performance indicators.</li> <li>- criteria that are not monitored and not evaluated may be surplus to the objective of the standards.</li> </ul>
Conclusion	References
<p>The IRFM Cert. Prog. is in alignment because the Draft IRFM Standard 2.0 foreword outlines the standard and its criteria as the basis for sustainable fisheries in Iceland - its primary objective.</p> <p>The FAO-ISO based Iceland Responsible Fisheries Management Programme is based on the Articles and Minimum Substantive Criteria described in the FAO Code of Conduct for Responsible Fisheries and FAO Guidelines for the Eco-labelling of Fish and Fishery Products.</p>	<ul style="list-style-type: none"> <li>• <u>Responsible Fisheries Management Standard</u></li> </ul>

# A . 3 E V I D E N C E O F A L I G N M E N T

A3.18		
GSSI Component	Guidance	
The Scheme Owner ensures that the standard is locally applicable. Where the Scheme Owner adapts the standard for direct application at the national or regional level, the Scheme Owner develops interpretive guidance or related policies and procedures for how to take into account local environmental and regulatory conditions.	<p>The Scheme Owner has mechanisms in place to ensure local applicability and relevance. For national or regional standards, the Scheme Owner has a process to take into account local environmental and regulatory conditions through guidance and policies.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> <li>- policies, internal procedures and quality handbook documenting process to consider environmental and regulatory aspects.</li> <li>- compare geographical scope of standard and implementation (certificates) with available documented interpretation guidance.</li> <li>- assessment or monitoring reporting indicating where locally specific guidance is required.</li> </ul>	
Conclusion	References	
The IRFM Cert. Prog. is in alignment because the scope of the IRFM Standard 2.0 pages 4-5 and the Programme is limited to:	<ul style="list-style-type: none"> <li>• <u><a href="#">Responsible Fisheries Management Standard</a></u></li> </ul>	
- The fisheries of Icelandic vessels within the Icelandic EEZ.		

A3.19		
GSSI Component	Guidance	
The Scheme Owner promptly publishes adopted standards, and makes them	Standards are published in a timely fashion and are freely available online and on request. Validity dates coincide with publication dates of standards (taking transition periods into account) and the public	

# A . 3 E V I D E N C E O F A L I G N M E N T

## A3.19

available for free on its website, and on request, to anyone expressing interest.

work program on standard setting and maintenance.

### Conclusion

The IRFM Cert. Prog. is in alignment because the operational standard is freely available on public website. Transition periods are outlined in IRFF Standard setting/reviewing procedure. Version 1.2 clauses 4.12 and 4.13. The final draft standards are published on IRFF's website with transition period until its final formal issue in accordance with IRFF procedure.

### References

- [IRFF, Standard Setting/Revising - Procedure, Version 1.2](#)
- Clause 4.12
- [Operational Standards](#)
- [Responsible Fisheries Management Standard](#)

## A3.20

### GSSI Component

The Scheme Owner shall make translations of the standard into English and in the most relevant/appropriate languages, to ensure access and transparency, freely available and authorizes translations into other languages where necessary for credible implementation of the standard.

### Guidance

The Scheme Owner has a mechanism in place to identify the applicability and need for translations based on geographical scope of certification, as well as the geographical range of certified entities and products. The process includes an assessment in order to ensure accurate translation.

Examples of evidence for scheme alignment:

- internal procedure, quality handbook, current language availability, work plan of translations, process for ensuring accuracy of translations.

### Conclusion

### References

# A . 3 E V I D E N C E O F A L I G N M E N T

## A3.20

The IRFM Cert. Prog. is in alignment because while scope is limited translations of several key documents is provided free of charge. The IRFF certification scope is fisheries of Icelandic vessels in Icelandic EEZ and of shared stocks, The Responsible Fisheries Management Specification is translated into English and the Chain of Custody Specification is translated into English and Spanish. The information on the homepage of IRFF is in English, Spanish, German and French and covers the languages of the main markets for Icelandic fish products.

- [Translations to other languages](#)

## A3.21

GSSI Component	Guidance
<p>The Scheme Owner ensures that certified entities are informed of the revised standard and transition period, either directly or through their certification bodies.</p>	<p>The Scheme Owner has a mechanism in place assuring that certified entities are informed of standard revision and transition periods. This can be done directly or through other assurance bodies.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> <li>- internal procedures, quality handbook, contracts/agreements or formal arrangements with certification bodies.</li> <li>- review process of previous revisions if applicable.</li> </ul>
Conclusion	References
<p>The IRFM Cert. Prog. is in alignment because according to the IRFF Standard setting/reviewing procedure, Article 4.13.</p>	<ul style="list-style-type: none"> <li>• <u><a href="#">IRFF, Standard Setting/Revising - Procedure, Version 1.2</a></u></li> <li>• Clause 4.13</li> </ul>



# A . 3 E V I D E N C E O F A L I G N M E N T

## A3.21

IRFF shall inform the certification body of the new/revised standards and transition period and according to the IRFF Certification Requirements Document 1.0 dated 17 July 2015 pg 31. Point 9.1, The CB shall after a notification from IRFF inform Accreditation Body and Clients of any revision of IRFF Responsible Fisheries Management Specification and transition period.

## A3.22

GSSI Component	Guidance	
<p>The Scheme Owner requires that the certified entities are given a period of at least three years to come into compliance with revised fishery standards and at least one year for revised aquaculture standards</p>	<p>Certified entities are given sufficient time to come into compliance with revised standards, for fisheries – minimum three years and at least one year for revised aquaculture standards.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> <li>- standards, certification requirements/methodologies which state minimum transition period for revised standards</li> </ul>	
Conclusion	References	
<p>The IRFM Cert. Prog. is in alignment because according to the IRFF Certification Requirements Document 1.1 (dated 24th of April 2016), section 9, article 9.2: Certified fisheries should be given a period of at least three years to come into compliance with the revised specification. Aquaculture one year specification is not applicable.</p> <p>However, this transition period was not needed after the approval of version 2.1 of the Standard, since no significant changes or additions were made. The review and revision of the Standard in this occasion, was only to upgrade the format and merge articles into one text where applicable to make the whole document more efficient.</p>	<ul style="list-style-type: none"> <li>• Certification Requirements</li> <li>• version 1.1, from april 2016.</li> <li>• IRFF Scheme Certification Requirements 1.1 copy.pdf</li> <li>• Control Document Version 1.0</li> <li>• Internal document: IRFF Control Document Version 1.0, dated 15 March 2015, Clause 3.1 and 3.2.</li> <li>• Doc Control 1.0.docx</li> </ul>	

# A . 3 E V I D E N C E O F A L I G N M E N T

## A3.22

Therefore, Version 2.1 of the Fisheries Management Standard was approved to be used effective immediately after its approval, without the need of a transition period of 3 years.

## A3.23

GSSI Component	Guidance
<p>The Scheme Owner notes in the standard the date of a revision or reaffirmation of the standard along with a transition period after which the revised standard will come into effect.</p>	<p>Standards include date of version and any transition period for the certified entity to come into compliance. If there are normative documents other than the standard and certification requirements/ methodologies which affect compliance of fisheries/aquaculture, these similarly should contain the described validity dates.</p>
Conclusion	References
<p>The IRFM Cert. Prog. is in alignment because according to the IRFF Control Document Version 1.0, (dated 15 March 2015), 3.2 Date of Effect: All control documents will be released with a date that they will come into effect.</p> <p>This will be identified on each document as either immediate from date of authorisation' or some other date agreed by IRFF e.g. Date of Effect: Three months from authorisation date. The transition period is covered in A.3.25, which is implemented via a control document, where both date of authorisation and date of effect are noted.</p>	<ul style="list-style-type: none"> <li>• Control Document</li> <li>• Internal document: IRFF Control Document Version 1.0, dated 15 March 2015, Clause 3.1 and 3.2.</li> <li>• Doc Control 1.0.docx</li> <li>• <u>IRF Standard 2.1</u></li> <li>• the date of effect and authorisation are the same for the case of version 2.1 of the Standard, as appears in the footer of the front page.</li> </ul>

# A . 3 E V I D E N C E O F A L I G N M E N T

**SECTION B.  
OPERATIONAL  
MANAGEMENT OF  
SEAFOOD  
CERTIFICATION  
SCHEMES**



## B.1 EVIDENCE OF ALIGNMENT

B1.01		
GSSI Component	Guidance	
The Scheme Owner has a contractual, enforceable arrangement or formal understanding that requires accreditation bodies to be compliant with the requirements of ISO/IEC 17011 in its applicable version.	<p>The Scheme Owner has a contract, memorandum of understanding or enforceable arrangement with a certification body or accreditation body that require the accreditation bodies to be compliant to ISO/ IEC 17011.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> <li>- contracts,</li> <li>- memorandums of understanding and/or memorandum of agreements between scheme and accreditation bodies or certification bodies that specify accreditation bodies to be compliant with ISO/IEC 17011.</li> <li>- accreditation bodies' certificate of accreditation (on website).</li> <li>- rules for accreditation bodies in standard.</li> </ul>	
Conclusion	References	
<p>The IRFM Cert. Prog. is in alignment because Certification Bodies (CB's) are required to have a contract with an Accreditation Body that is a member of IAF Mutual Recognition. IRFF sets out the accreditation requirements on CB's and specifies that they must use formal ISO Accreditation from an IAF member. This allows the CB to use their National ISO accreditation body. IRFF Cert Requirements V1.1 2016</p> <p>3.2.L Only CB's with the relevant accreditation from an IRFF recognized Accreditation Body will be eligible for approval. Recognition shall be accreditation frdm an International Accreditation Forum member.</p>	<ul style="list-style-type: none"> <li>• <a href="#"><u>Global Trust (GT) Accreditation Certificate</u></a></li> <li>• IRFF Certification Requirements                             <ul style="list-style-type: none"> <li>• Article. 3.1.1 in CERTIFICATION REQUIREMENTS FOR THE OPERATION OF AN ISO ACCREDITED THIRD PARTY SCHEME FOR THE ASSESSMENT AND CERTIFICATION OF ICELANDIC FISHERIES (hereafter referred to as IRFF Certification Requirements) Version 1.1 dated 24 April 2016.</li> </ul> </li> </ul>	

# B.1 EVIDENCE OF ALIGNMENT

## B1.01

3,2-4 IRFF will maintain a record of the approved CB and shall require the CB to provide proof of ISO/IEC 17065 accreditation specific to IRFF Scheme.

## B1.02

GSSI Component	Guidance
<p>The Scheme Owner ensures that accreditation services are available to certifying bodies irrespective of their country of residence, size, and of the existing number of already accredited bodies, within the scope of the scheme.</p>	<p>The Scheme Owner ensures that access to accreditation is open to qualified certification bodies without consideration of size, country or number of existing accredited certification bodies. This could be through contracts/agreements, in referenced policies or certification requirements/methodologies.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> <li>- application process/forms,</li> <li>- review list of accredited certification bodies</li> </ul>
<p><b>Conclusion</b></p> <p>The IRFM Cert. Prog. is in alignment because availability of accreditation services is prerequisite of IAF ISO Accreditation. A requirement of ISO accreditation body ISO 17011: The accreditation body's policies and procedures shall be non-discriminatory and shall be administered in a non-discriminatory way. The accreditation body shall make its services accessible to all applicants whose requests for accreditation fall within the activities (see 4.6.1) and the limitations as defined within its policies and rules.</p> <p>Access shall not be conditional upon the size of the applicant CAB or membership of any association or group, nor shall accreditation be conditional upon the number of CABs already accredited.</p>	<p><b>References</b></p> <ul style="list-style-type: none"> <li>• <a href="#">IAF website</a></li> <li>• <a href="#">INAB website</a></li> </ul>

# B . 1 E V I D E N C E O F A L I G N M E N T

## BI.03

GSSI Component	Guidance
<p>The Scheme Owner specifies the requirements for certification bodies that the accreditation body is required to verify, including the respect of the scope of the scheme</p>	<p>The Scheme Owner defines requirements for certification bodies to ensure accurate and consistent implementation. These are verified as part of the accreditation process by the accreditation body.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> <li>- requirements are specified in certification requirements/ methodologies or a separate certification body and/or accreditation manual.</li> <li>- reference to requirements in contracts or formal agreements with certification bodies or accreditation bodies.</li> </ul>
Conclusion	References
<p>The IRFM Cert. Prog. is in alignment because CB requirements are documented as part of Certification Requirements for accreditation. Requirements focus on ISO 17065 Conformity Assessment; Requirements for bodies providing audit and certification of product, processes and services are outlined in Chapters 3 - application, Chapter 4 - Qualifications, Chapter 6 Assessment requirements and Chapter 8 - post certification requirements</p>	<ul style="list-style-type: none"> <li>• <a href="#">IRF Website</a></li> <li>• IRFF Certification Requirements</li> <li>• Verified in internal document IRFF Certification Requirements, Version 1.0 dated 17 July 2015. Chapter 3.0 and 4.0.</li> </ul>

# B.1 EVIDENCE OF ALIGNMENT

## B1.04

GSSI Component	Guidance
<p>Subsequent to any changes in the requirements for assessing certification bodies, the Scheme Owner ensures certification bodies are given a defined time period within which to conform to the changes.</p> <p>Special considerations should be given to certification bodies in developing countries and countries in transition.</p>	<p>The Scheme Owner specifies transition periods for any changes to certification requirements (B.1.03) for certification bodies to come into compliance with changes. For certification bodies in developing countries consideration is given that may include a longer transition period, capacity building or other measures.</p> <p>Examples of evidence for scheme alignment:                      - see B.1.03 reference to transition period and/or special consideration for developing country certification bodies.</p>
Conclusion	References
<p>The IRFF Cert. Prog. is in alignment because IRFF has implemented a defined document control/release procedure (IRFF Document Control V1.0 dated 15th of March 2015) for all revisions to Scheme requirements and Specification that identifies authorisation date and date that it comes into effect.</p> <p>Process outlined for determining transition periods depending on nature of the revision (how substantial it is), the time line allowed for implementation by CB's (and therefore those changes</p>	<ul style="list-style-type: none"> <li>• IRFF Document Control V1.0</li> <li>• Internal document. dated 15th of March 2015, outlines the process for determining transition periods.</li> <li>• Standard Setting/Revising procedure</li> <li>• new evidence added 11th march 2024, version 1.2 March 2016. latest version of this document</li> <li>• articles, 4.1,4.12, 4.13</li> <li>• StandardReviewProc1.2 copy.pdf</li> <li>• TC approval</li> <li>• email as evidence of TC members approving the changes made for version 2.1 of the standard.</li> <li>• as discussed in other components, there was no significant changes to the text of the standard, but rather a revision of the form to simplify the format by merging articles and changing wrong references</li> <li>• TC approval standard revision 2.1 (icelandic).eml</li> <li>• TRANSLATION to English</li> </ul>



# B . 1 E V I D E N C E O F A L I G N M E N T

## B1.04

coming into effect for applicant and existing certified fisheries) is undertaken by the Technical Committee (Specification Revisions) and Scheme Management (Scheme Operations) at the time of release.

The Scheme is specific only to Iceland and hence, developing/in transition countries are out of scope

- Changes made, approved by all TC members ( the email you can see was the one including all the modifications sent out by the chairman of the TC, and my response as TC member, approving the changes. all of the other TC members sent the same response).After the chairman explains the changes he asks the members to answer by email to confirm their approval or state disagreement. all members answered with approval. Can show all their answers during Office Visit Follow up:
- 1. Merging of articles 1.1.1 and 1.1.2. into one.
- 2. article 1.2.5. is added to 1.1.2.
- 3. article 1.5.3 and 1.5.4 combined into one.
- 4. article 2.2.2 and 2.2.3 combined into one.
- 5. wrong reference from article 3.2.3.3. to article 3.2.4.2 disappears.
- TC approval standard revision 2.1 (icelandic).eml

## B1.05

GSSI Component	Guidance
<p>The Scheme Owner only works with accreditation bodies that have personnel with the necessary education, training, technical knowledge and experience for performing accreditation functions in</p>	<p>The Scheme Owner ensures personnel competency through contracts or enforceable arrangements with accreditation bodies. Personnel competency includes education, training on the standard, technical knowledge and experience and can be defined by the Scheme Owner.</p> <p>Examples of objective evidence:</p> <ul style="list-style-type: none"> <li>- Agreement/contract between the Scheme Owner and certification body to use national accreditation bodies which are IAF members and signatories to the Multilateral Recognition Arrangement for ISO 17065.</li> <li>- Contract/agreement between the Scheme Owner and the accreditation body if applicable, certification/accreditation manuals.</li> </ul>

# B.1 EVIDENCE OF ALIGNMENT

## B1.05

fisheries and aquaculture operations.

- Requirements for Accreditation Bodies and personnel mentioned in the standard

### Conclusion

The IRFM Cert. Prog. is in alignment because they specify formal accreditation by IAF ISO members to ensure that the Scheme is in conformance with this requirement. IRFF Certification Requirements Version 1.1 dated 16 April 2016. 3.2.1.

Only CB's with the relevant accreditation from an IRFF recognized Accreditation Body will be eligible for approval. Recognition shall be accreditation from an International Accreditation Forum member

### References

- IRFF Certification Requirements
- Internal document IRFF Certification Requirements. Version 1.1 dated 24 April 2016. Clause 3.2.1
- [Official Irish National Accreditation Body \(INAB\) website](#)

## B1.06

### GSSI Component

The Scheme Owner ensures that external audits are carried out on the accreditation body to assess performance.

### Guidance

The Scheme Owner ensures accreditation bodies undergo external/ independent performance assessments.

Examples of evidence for scheme alignment:

- assessment process and requirements of IAF, ISEAL or other membership organization.
- Scheme Owner accreditation manual or requirements, contracts or agreements, assessment reports.

### Conclusion

The IRFM Cert. Prog. is in alignment because they specify only IAF ISO accreditation in order to ensure that this requirement is a prerequisite.

### References

- [IRF Website](#)
- IRFF Certification Requirements

# B . 1 E V I D E N C E O F A L I G N M E N T

## B1.06

IRFF does not form a specific contract/arrangement with ISO Accreditation Body (ies). Refer to ISO 17011/IAF.

External audits are conducted. IRFF Scheme Requirements do specify that accreditation to ISO 17065 is maintained by CB's and this requires that external audits are conducted.

- Verified in internal document IRFF Certification Requirements. Version 1.1 dated 24 April 2016. Clauses 3.1.1, 3.2.1, 3.2.4, 3.2.5 and 3.2.6.

## B1.07

GSSI Component	Guidance
The Scheme Owner ensures that the accreditation body is transparent about its organizational structure and the financial and other kinds of support it receives from public or private entities.	<p>Scheme owner ensures accreditation body transparency regarding organizational structure and financial support. The Scheme Owner requires disclosure of this information directly from the accreditation body.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> <li>- accreditation body website with information, certification/ accreditation manuals, contracts and/or agreements.</li> <li>- agreement/contract between the Scheme Owner and certification body to use national accreditation bodies which are IAF members and signatories to the Multilateral Recognition Arrangement for ISO 17065;</li> <li>- annual or periodic reports.</li> </ul>
Conclusion	References
The IRFM Cert. Prog. is in alignment because according to the Certification Requirements Version 1.1, 16 April 2016, 3.2.1; only CB's with the relevant	<ul style="list-style-type: none"> <li>• <a href="#">INAB Committees/Board</a></li> <li>• <a href="#">INAB Website</a></li> <li>• IRFF Certification Requirements</li> </ul>

# B . 1 E V I D E N C E O F A L I G N M E N T

## B1.07

accreditation from an IRFF recognized Accreditation Body will be eligible for approval.

Recognition shall be accreditation from an International Accreditation Forum member. IAF requires AB "to have the technical and financial capacity to undertake accreditation tasks, and perform these tasks in a neutral, nondiscriminatory and independent manner".

Organizational structure is on the INAB website: <http://www.inab.ie/About-Us/Organisation/>

- Internal document IRFF Certification Requirements. Version 1.1 dated 24 April 2016. Clause 3.2.1.

## B1.08

GSSI Component	Guidance
<p>The Scheme Owner ensures that the accreditation process includes an on-site audit of the certification body.</p>	<p>The Scheme Owner specifies that accreditation includes an on-site audit of the certification body.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> <li>- accreditation/certification requirements/methodologies, accreditation body office audit reports, audit schedule.</li> <li>- specified in accreditation body or certification body contracts/ agreements.</li> <li>- agreement/contract between the Scheme Owner and certification body to use national accreditation bodies which are IAF members and signatories to the Multilateral Recognition Arrangement for ISO 17065.</li> </ul>
<p>Conclusion</p>	<p>References</p>

# B.1 EVIDENCE OF ALIGNMENT

## B1.08

The IRFM Cert. Prog. is in alignment because it recognizes only IAF member ABs that include performance review requirements encompassing office audits.

IRFF Certification Requirements Version 1.1 dated 16 April 2016. 3.2.1: Only CB's with the relevant accreditation from an IRFF recognized Accreditation Body will be eligible for approval. Recognition shall be accreditation from an International Accreditation Forum member.

IRFF Scheme Requirements require that only ISO 17065 accredited certification bodies are eligible and ISO 17065 accreditation requires CB's to accept regular accreditation audits at their offices

- IRFF Certification Requirements
- Internal document IRFF Certification Requirements. Version 1.1 dated 24 April 2016. Clause 3.2.1

## B1.09

GSSI Component	Guidance
<p>The Scheme Owner ensures that the accreditation process includes a review of the performance of certification bodies and auditors, using witness audits.</p>	<p>The Scheme Owner specifies that accreditation includes a performance review of certification bodies and auditors, that may include desktop reviews, office visits, witness audits.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> <li>- accreditation/certification requirements/methodologies, accreditation body audit reports, audit schedule, specified in accreditation body or certification body contracts/agreements.</li> <li>- agreement/contract between the Scheme Owner and certification body to use national accreditation bodies which are IAF members and signatories to the Multilateral Recognition Arrangement for ISO 17065.</li> </ul>
Conclusion	References
<p>The IRFM Cert. Prog. is in alignment because it recognizes only IAF member ABs that includes performance review requirements, including witness audits.</p>	<ul style="list-style-type: none"> <li>• IRFF Certification Requirements</li> </ul>

# B . 1 E V I D E N C E O F A L I G N M E N T

## B1.09

IRFF Certification Requirements Version 1.1 dated 16 April 2016. 3.2.1: Only CB's with the relevant accreditation from an IRFF recognized Accreditation Body will be eligible for approval. Recognition shall be accreditation from an International Accreditation Forum member.

IRFF Scheme Requirements require that only ISO 17065 accredited certification bodies are eligible and ISO 17065 accreditation requires CB's to accept regular witnessed audits of assessors in the field.

- Internal document IRFF Certification Requirements. Version 1.1 dated 24 April 2016 Clause 3.2.1.

## B.2 EVIDENCE OF ALIGNMENT

B2.01	
GSSI Component	Guidance
<p>The Scheme Owner requires that certification bodies operating in the scheme are accredited to conduct certifications for the scope of their respective standards in conformance with ISO/IEC 17065 in its applicable version.</p>	<p>The Scheme Owner has a contract, memorandum of understanding or enforceable arrangement with certification body that require to follow the principles of ISO/ IEC 17065 for the scope of the respective standard of the scheme.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> <li>- contracts, memorandums of understanding and/or memorandum of agreements between Scheme and accreditation bodies or certification bodies that specify certification bodies be accredited with ISO 17065</li> <li>- accreditation manual or certification requirements/methodologies; certification bodies certificate of accreditation.</li> </ul>
Conclusion	References
<p>The IRFM Cert. Prog. is in alignment because Certification Bodies (CBs) wishing to apply for approval for the operation of an accredited third party certification scheme for the IRFF Scheme must be accredited to ISO/IEC Guide 65 / ISO 17065 "General requirements for bodies operating certification systems". This is defined in the IRFF Certification Requirements. Version 1.1 dated 16 April 2016. Clause 3.1.1</p> <p>The INAB accreditation of the CB Global Trust covers both applicable standards, p 4: Iceland Responsible Fisheries Foundation Responsible Fisheries Management Standard, revision 2.0, June 2016 and Iceland Responsible Fisheries Foundation Responsible Fisheries Management Chain of Custody standard Issue 2, May 2016.</p>	<ul style="list-style-type: none"> <li>• <a href="#"><u>Accreditation certificate</u></a></li> <li>• IRFF Certification Requirements</li> <li>• Internal document IRFF Certification Requirements. Version 1.1 dated 24 April 2016. Clause 3.1.1, 3.3.2 and 4.1.</li> </ul>

## B . 2 E V I D E N C E O F A L I G N M E N T

### B2.01

There is a formalized oversight system to ensure CBs are in conformance with relevant Certification Requirements, including an annual review checklist and a periodic performance review of Certification Bodies (CB).

Currently waiting accreditation for the Unified RFM Chain of Custody Standard, effective since January 2022.

Version 2.0 of The IRFM Standard issued in 2016 has become Version 2.1, finalised in December 2022, now in public comments process from 4th of January 2023 to 5th of March 2023.

### B2.02

#### GSSI Component

The Scheme Owner requires certification bodies to maintain a written fee structure that is available on request and is adequate to support accurate and truthful assessments commensurate with the scale, size and complexity of the fishery, fish farm or chain of custody. The fee structure is non-discriminatory and takes into account the special circumstances and requirements of developing countries and countries in transition.

#### Guidance

The Scheme Owner defines this requirement in the contract, memorandum of understanding or enforceable agreement with the accreditation body and/or certification body.

Examples of evidence for scheme alignment:

- accreditation manual/certification requirements/methodologies.
- possibly also review accreditation body audit reports that this requirement is verified, and for compliance of certification bodies on this requirement.



## B . 2 E V I D E N C E O F A L I G N M E N T

### B2.02

- policy or procedure which outlines how fee structures of certification bodies could address special requirements of developing and in transition countries in a non-discriminatory manner; certification body fee structure and policy (online or request).

#### Conclusion

The IRFM Cert. Prog. is in alignment because a service fee structure for IRFF Certification Scheme is available and it provides the basis for developing the costs associated with full assessment and surveillance assessment and certification for IRFF.

Virtual office visit review of CB fee structure

#### References

Certification Body Fee Structure – confidential document

### B2.03

#### GSSI Component

The Scheme Owner defines that the validity of a certification cycle does not exceed 5 years in the case of fishery or 3 years in the case of aquaculture certification and 3 years in the case of chain of custody certification.

#### Guidance

The Scheme Owner defines this requirement in the contract, memorandum of understanding or enforceable agreement with the accreditation body and/or certification body.

Examples of evidence for scheme alignment:

- accreditation manual/certification requirements/methodologies. Issued certificates with validity (online database or on request)

#### Conclusion

The IRFM Cert. Prog. is in alignment because this is specified in the Certification Requirements:

#### References

- [IRF Website](#)
- IRFF Certification Requirements

# B . 2 E V I D E N C E O F A L I G N M E N T

## B2.03

"7.7.2: Certificates shall be valid for a period of five years at which point full re Assessment must be completed within the period of validity of the anniversary of the 1ST Certification date if the Certified Fishery wishes to maintain uninterrupted certification. Certificates shall be valid for a period of five years at which point full re-assessment must be completed within the period of validity of the anniversary of the 1ST Certification date if the Certified Fishery wishes to maintain uninterrupted certification."

- Verified in internal document IRFF Certification Requirements. Version 1.1 dated 24 April 2016. Clause 7.7.2

## B2.04

GSSI Component	Guidance
<p>The Scheme Owner requires that certification bodies carry out periodic surveillance and monitoring at sufficiently close intervals to verify that certified operations continue to comply with the certification requirements. For aquaculture operations, this shall be on an annual basis.</p>	<p>The Scheme Owner defines this requirement in the contract, memorandum of understanding or enforceable agreement with accreditation body and/or certification body. Scheme owner risk assessment system should identify "sufficient close intervals".</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> <li>- accreditation manual/certification requirements/methodologies.</li> <li>- Scheme Owner internal risk assessment system with assessment reports.</li> <li>- Audit reports, schedules and issued certificates.</li> </ul>
Conclusion	References
<p>The IRFM Cert. Prog. is in alignment because this is explicit in the Certification requirements Chapter 8. See below:</p> <p>8.1 Surveillance Audits</p>	<ul style="list-style-type: none"> <li>• <a href="#">3rd Surveillance report Cod</a></li> <li>• <a href="#">3rd Surveillance report Golden redfish</a></li> <li>• IRFF Certification Requirements</li> </ul>

## B . 2 E V I D E N C E O F A L I G N M E N T

### B2.04

8.1.1 The CB shall perform Surveillance Audits to determine the continual conformance of the fishery to the IRFF Specification and Scheme Requirements.

8.1.2 The CB shall arrange surveillance audits with the Certified Fishery, at least annually and more frequently if deemed necessary, including short notice audits.

8.1.3 Short notice audits shall be based on evidence of risk of serious non conformity and credibility to the Scheme and substantiated by the CB and made available to IRFF on request.

- Internal document IRFF Certification Requirements Version 1.1 dated 24 April 2016. Chapter 8.1-8.5;

### B2.05

GSSI Component	Guidance
The Scheme Owner ensures that certification bodies apply a consistent	The Scheme Owner defines the methodology to assess compliance with the standard. An internal assessment (updated regularly) with clear outcomes, identifies if the methodology is consistent between certification bodies or if the methodology needs revising.

# B . 2 E V I D E N C E O F A L I G N M E N T

## B2.05

methodology to assess compliance with the standard.

Examples of evidence for scheme alignment:

- certification requirements/methodologies,
- contracts and agreements with the certification body,
- guidance interpretation documents,
- Scheme Owner internal assessment system with assessment reports,
- training and calibration records.

### Conclusion

The IRFM Cert. Prog. is in alignment because this is covered in Certification Requirements Chapter 6. Full Assessment Requirements. Detailed below:

- 6.0 Full Assessment Requirements;
- 6.1 Service Agreement;
- 6.2 Appointment of Full Assessment Team
- 6.3 Assessment Team Verification
- 6.4 Develop an Assessment Schedule or Plan
- 6.5 On -Site Assessment and Engagement
- 6.6 Desk top review and analysis of information
- 6.7 On- site Fishery Assessment
- 6.8 Scoring Method
- 6.9 Confidence Ratings and Assignment of Non Conformances
- 6.10 Corrective Action Plans that describe how CB's shall apply assessment.

Templates are used for different types of assessment to ensure consistency in reporting. IRFF currently operates one approved CB and, until such time an additional CB is approved, does not need to identify further methods to ensure consistency between CB's. IRFF undertakes due diligence on Certification Reports through an annual performance review procedure.

### References

- IRFF Certification Requirements
  - Internal documents:
  - IRFF Certification Requirements Version 1.1 dated 24 April 2016. Chapters 6.6-6.7 in Certification Requirement;
  - GT Template for FAO Based Responsible Fisheries Management for full Assessment and Certification Report (Form 11 ICE FAO RFM Full Assessment Template);
  - GT Template for FAO Based Responsible Fisheries Management (IRFM) Certification Surveillance Report (Form 11b ICE FAO RFM Surveillance Report Template);
  - QP2C - application validation 3.3, section 5.

# B . 2 E V I D E N C E O F A L I G N M E N T

## B2.05

- [Review assessment reports for implementation. Available Online](#)

### B2.05.02

GSSI Component	Guidance
The Scheme Owner has defined requirements for sampling methodology and frequency that certification bodies are required to follow during the audit.	<p>The Scheme Owner defines the requirements for certification bodies for sampling methodology and frequency of audits.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> <li>- contract, memorandum of understanding or enforceable agreement between the Scheme Owner and the certification body.</li> <li>- accreditation manual, certification requirements/ methodologies</li> <li>- audit reports</li> <li>- guidance specifying sampling methodology (including what issues to focus on) and sampling frequency, in order to support consistency between certification bodies.</li> </ul>
Conclusion	References
The IRFM Cert. Prog. is in alignment because sampling is not part of methodology – all entities are included in assessment as specified in Certification Requirements. For fishery certification, sampling methodology is not the most suitable term. The on-site audit considers all main entities involved in fisheries science, management and compliance. It also identifies the main Fishery Associations and key fishing companies as examples and	<ul style="list-style-type: none"> <li>• IRFF Certification Requirements</li> <li>• Review of internal document IRFF Certification Requirements Version 1.1 dated 24 April 2016.</li> </ul>

# B . 2 E V I D E N C E O F A L I G N M E N T

## B2.05.02

other users e.g. Small Boat Owners Association. A site visit plan is based on consultation with these entities, Thus, the result is stronger than requirement.

## B2.06

GSSI Component	Guidance	
<p>The Scheme Owner ensures that certification bodies have consistent documented procedure(s) that specify the conditions under which certification may be suspended or withdrawn, partially or in total, for all or part of the scope of certification.</p>	<p>For accurate and consistent implementation of the standard, the Scheme Owner ensures that certification bodies have documented procedures that specify the conditions under which certification may be suspended or withdrawn, partially or in total, for all or part of the scope of certification.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> <li>- contract, memorandum of understanding or enforceable agreement between the Scheme Owner and the certification body; accreditation manual, certification requirements/methodologies,</li> <li>- audit reports,</li> <li>- guidance documents specifying the conditions under which certification may be suspended or withdrawn.</li> </ul>	
Conclusion	References	
<p>The IRFM Cert. Prog. is in alignment because this is included in the Certification Requirements under 8.4, Assessing progress against Corrective Action Plans and Observations. 8.4.1- 8.4.4.</p> <p>8.5 Suspension or withdrawal of certificate: "The CB shall have documented procedures that define suspension and withdrawal of a Certified Fishery Certificate. Where a Client refuses to undertake additional re-assessment or fails to provide sufficient access for surveillance or re-assessment purposes or fails to</p>	<ul style="list-style-type: none"> <li>• IRFF Certification Requirements</li> <li>• Internal document IRFF Certification Requirements Version 1.1</li> </ul>	

# B . 2 E V I D E N C E O F A L I G N M E N T

## B2.06

provide sufficient evidence to meet the requirements of corrective action plans the CB shall implement the procedure with respect to Certificate suspension pending potential withdrawal based on the outcome of a documented review by the CB. On request, the CB shall provide Certified Fisheries a copy of the procedure. CB's shall inform the client in writing of its intention to suspend or withdraw the certificate with a written rationale for its decision. The Certified Fishery shall be provided with notice of and an opportunity to appeal the decision prior to final certificate withdrawal."

dated 24 April 2016.  
Chapter 8.4 and 8.5.

Virtual office visit - review of CB contract May 2024

## B2.07

GSSI Component	Guidance
<p>The Scheme Owner requires that certification bodies follow procedures and guidance for multi-site certifications as written in the standard or other scheme documents, if allowed under the scheme.</p>	<p>If the Scheme Owner explicitly does not allow multi-site certification (prohibits, not that it is not yet developed or exists) requirement is "Not applicable". Otherwise, the Scheme Owner requires certification body to follow have documented procedures and guidance for multi-site certification, detailed in the agreement or in the standards</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> <li>- memorandum of understanding or enforceable agreement between the Scheme Owner and the certification body;</li> <li>- requirements and guidance for multi-site certification</li> <li>- audit reports.</li> </ul>
Conclusion	References
<p>This GSSI Essential Component is not applicable because the IRFM Cert. Prog. does not include aquaculture.</p>	

## B . 2 E V I D E N C E O F A L I G N M E N T

### B2.08

GSSI Component	Guidance
<p>The Scheme Owner requires certification bodies to ensure consistency in audit report formats and in how the reports are completed.</p>	<p>The Scheme Owner defines this requirement for certification bodies and has some system for quality control.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> <li>- contract/agreement between the Scheme Owner and the certification body, certification requirements/methodologies;</li> <li>- guidance specifying formats for audit reports and reporting, mandatory audit templates;</li> <li>- review online audit reports for consistency of report format and reporting, Scheme Owner quality management system for review of audit reports.</li> </ul>
Conclusion	References
<p>The IRFM Cert. Prog. is in alignment because Certification Requirements explicitly cover this in 7.2.2. The Full Assessment Report shall be produced to a defined and consistent template in accordance with the Scheme Requirements.</p>	<ul style="list-style-type: none"> <li>• IRFF Certification Requirements Version 1.0</li> <li>• Chapter 7.2.2</li> </ul>

### B2.09

GSSI Component	Guidance
<p>The Scheme Owner requires that</p>	<p>The Scheme Owner defines this requirement for certification bodies to have a documented procedure to enable input from all stakeholders during the certification process.</p>



## B . 2 E V I D E N C E O F A L I G N M E N T

### B2.09

certification bodies have in place consistent procedures for stakeholders to provide input during the certification process.

Examples of evidence for scheme alignment:

- contract/agreement between the Scheme Owner and the certification body, certification requirements/methodologies specifying requirements for mechanism for stakeholder input during certification process.
- guidance specifying procedures.
- review certification body process for input:
- publicly available information for stakeholder input, public announcements, audit work plans, requests for input.
- audit reports with stakeholder input.

#### Conclusion

The IRFM Cert. Prog. is in alignment because this is specified in Certification Requirements 6.5.2. [Engagement with client, fishery management organisational and fishery participants can take place throughout the assessment period, by direct meeting, by e-mail correspondence and or by telephone. A record log of all engagement meetings (e-mails etc.) with the applicant, fishery participants and stakeholders must be maintained as part of full-filling the procedures of assessment].

#### References

- IRFF Certification Requirements
- Internal document IRFF Certification Requirements Version 1.1 dated 24 April 2016. Clause 6.5.2

### B2.09.01

#### GSSI Component

The Scheme Owner requires that the certification body solicits stakeholder

#### Guidance

The Scheme Owner defines this requirement for certification bodies to solicit input from all stakeholders during the certification process.

Examples of evidence for scheme alignment:

# B . 2 E V I D E N C E O F A L I G N M E N T

## B2.09.01

input during the audit process.	<ul style="list-style-type: none"> <li>- contract/agreement between the Scheme Owner and the certification body, certification requirements/methodologies specifying requirement for mechanism for stakeholder input during certification process,</li> <li>- guidance specifying procedures,</li> <li>- review certification body process for input: publicly available information for stakeholder input, public announcements, audit work plans, requests for input,</li> <li>- audit reports with documented stakeholder input.</li> </ul>
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### Conclusion

The IRFM Cert. Prog. is in alignment because while the requirement is not expressed explicitly as in the GSSI criteria, there are no barriers and announcements are made in the media and to an extensive list of stakeholders. Certification Requirements 6.7.3, Post the site visit, the CB Assessment Team shall continue to exercise the opportunity to communicate with relevant fishery stakeholders where further dialogue is deemed necessary or where a stakeholder has provided information specific to the evaluation.

#### 6.5 On-site Assessment and Engagement

Engagement with client, fishery management organisational and fishery participants can take place throughout the assessment period, by direct meeting, by e-mail correspondence and or by telephone.

A record log of all engagement meetings (e-mails etc.) with the applicant, fishery participants and stakeholders must be maintained as part of full-filling the procedures of assessment.

6.5.3 The site visit meeting plans shall be specific to the fishery under evaluation but would normally consider meetings with:...(list of stakeholders)

### References

- IRFF Certification Requirements
- Internal document IRFF Certification Requirements Version 1.1. 24 April 2016. Clause 6.7.3.

## B2.10

GSSI Component	Guidance
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# B . 2 E V I D E N C E O F A L I G N M E N T

## B2.10

The Scheme Owner requires that certification bodies follow its requirements for determining non-compliances, verifying corrective actions arising from non-compliances and allowing for appeals of non-compliances.

For accurate and consistent implementation of the standard, the Scheme Owner ensures that certification bodies follow non-compliances, verifying corrective actions arising from non-compliances, and allowing for appeals of non-compliances.

Examples of evidence for scheme alignment:

- contract, memorandum of understanding or enforceable agreement between the Scheme Owner and the certification body.
- accreditation manual, certification requirements/methodologies.
- guidance documents, determining non-compliances, verifying corrective actions arising from non-compliances and allowing for appeals of non-compliances, in order to support consistency between certification bodies.
- audit reports.
- standards.

### Conclusion

The IRFM Cert. Prog. is in alignment because this is outlined in detail in the IRFF Certification Requirements 6.8 Scoring Method, 6.9 Confidence Ratings and Assignment of Non Conformances, 6.10 Corrective Action Plans input and review is allowed within the process for applicant to review and provide additional information.

7.6 Appeals and Complaints enables appeals of certification decisions reviewed and verified addressed in internal/confidential Global Trust Procedures Manual QP2C 5.1 and 7.2 in chapters on Confidence Ratings and Assignment of Non Conformances, Corrective Action Plans and Appeals and Complaints.

Also, note that the CB does not direct the fishery in the course of corrective action. This is the responsibility of fishery managers. The CB must confirm that the intended actions will meet the intent of the clause and then track (surveillance) the fishery to confirm that managers implement their commitments.

### References

- IRFF Certification Requirements
- Internal document IRFF Certification Requirements Version 1.1 dated 24 April 2016. Clause 6.7, 6.8 and 7.6

# B . 2 E V I D E N C E O F A L I G N M E N T

B2.11	
GSSI Component	Guidance
The Scheme Owner requires that the scope of the (re-)certification audit includes a visit to locations pertinent to the scope of the certification.	<p>The Scheme Owner requires that the scope of the audit (initial, annual or re-assessment) includes on-site assessment of premises covered by the scope of the standards and within which one or more key activities are performed.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> <li>- contract, memorandum of understanding or enforceable agreement between the Scheme Owner and the certification body,</li> <li>- accreditation manual, certification requirements/methodologies,</li> <li>- guidance documents specifying procedures for determining site visits including sampling,</li> <li>- review audit reports.</li> </ul>
Conclusion	References
The IRFM Cert. Prog. is in alignment because it is specified in Certification Requirements 6.4 that the on-site audit considers all main entities involved in fisheries science, management and compliance.	<ul style="list-style-type: none"> <li>• IRFF Certification Requirements</li> <li>• Internal document IRFF Certification Requirements Version 1.1 dated 24 April 2016. Clause 6.4</li> <li>• <a href="#"><i>3rd Surveillance report Cod</i></a></li> <li>• page 10, 6.1 surveillance meetings</li> </ul>

B2.11.01	
GSSI Component	Guidance

## B . 2 E V I D E N C E O F A L I G N M E N T

### B2.11.01

The Scheme Owner requires that CBs conduct unscheduled audits.

'Unscheduled' means without significant advance warning.

The Scheme Owner defines this requirement for certification bodies to conduct unscheduled (without significant advance warning) or surprise audits. The Scheme Owner defines process for determining audits and methodologies to ensure consistent implementation.

Examples of evidence for scheme alignment:

- contract/agreement between the Scheme Owner and the certification body,
- certification requirements/methodologies specifying requirement and conditions for unscheduled audits (e.g. risk, context, complaints received),
- guidance specifying procedures and process to ensure consistency,
- audit reports.

#### Conclusion

The IRFM Cert. Prog. is in alignment because the Certification Requirements require the CB to arrange surveillance audits with the Certified Fishery, at least annually and more frequently if deemed necessary, including short notice audits. This is done in accordance to an ISO 17065 requirement.

8.1.3 Short notice audits shall be based on evidence of risk of serious non conformity and credibility to the Scheme and substantiated by the CB and made available to IRFF on request.

#### References

- IRFF Certification Requirements
- Internal document IRFF Certification Requirements Version 1.1 dated 24 April 2016. Clause 8.1.3

### B2.12

GSSI Component

Guidance

## B . 2 E V I D E N C E O F A L I G N M E N T

### B2.12

The Scheme Owner requires that a list of certified entities is made publicly available.

The Scheme Owner makes publicly available a list of certified entities either directly or requires of certification bodies/accreditation bodies.

Examples of evidence for scheme alignment:

- system to show the certification status of entities is publicly available online (e.g. database or online certificate list). If this system is outsourced to the accreditation bodies or certification bodies, this is required and the system described in the contract/ agreement between the Scheme Owner and the accreditation body/certification body, in a separate accreditation manual or certification requirements/methodologies.

#### Conclusion

The IRFM Cert. Prog. is in alignment because a list of certified enterprises are available at the IRFF website.<https://www.responsiblefisheries.is/certification/certified-fisheries>

#### References

- [Certified Suppliers](#)
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### B2.13

#### GSSI Component

For fisheries, the Scheme Owner requires certification bodies to make full audit reports available on request after certification has been granted, while

#### Guidance

Applicable only to fisheries, for Aquaculture "Not Applicable". The Scheme Owner defines this requirement for certification bodies to make full audit reports, after certification has been granted, available online or upon request. Commercially sensitive information is excluded. Contracts with certified entities should clearly give notice of this requirement.

Examples of evidence for scheme alignment:

## B . 2 E V I D E N C E O F A L I G N M E N T

### B2.13

excluding commercially sensitive information.

- contract/agreement between the Scheme Owner and the certification body, contract with certification body and certified entity with this requirement,
- certification requirements/methodologies specifying requirement,
- guidance specifying that making reports available to stakeholders happens in a timely manner,
- review certification body website for posted reports or process for responding to requests.

#### Conclusion

The IRFM Cert. Prog. is in alignment because all certification reports are available on the IRFF website.  
<https://www.responsiblefisheries.is/certification/certified-fisheries>

#### References

- [Certified Fisheries](#)

### B2.14

#### GSSI Component

For aquaculture, the Scheme Owner requires certification bodies to make summary audit reports publicly available (excluding commercially sensitive material information) after certification has been granted.

#### Guidance

Applicable only to Aquaculture. For Fisheries “Not Applicable”. The Scheme Owner defines this requirement for certification bodies to make summary audit reports, after certification has been granted, publicly available. Commercially sensitive information is excluded. Contracts with certified entities should clearly give notice of this requirement.

Examples of evidence for scheme alignment:

- contract/agreement between the Scheme Owner and the certification body, contract with certification body and certified entity with this requirement.
- certification requirements/methodologies specifying requirement.
- guidance specifying that making reports available to stakeholders happens in a timely manner.
- certification body website for posted reports.

## B . 2 E V I D E N C E O F A L I G N M E N T

### B2.14

#### Conclusion

This GSSI Essential Component is not applicable to the IRFM Cert. Prog. because it does not include aquaculture.

#### References

### B2.15

#### GSSI Component

The Scheme Owner notifies accreditation bodies, certification bodies and certified entities of any change in management procedures which affects scheme rules and procedures for accreditation or certification.

#### Guidance

The Scheme Owner has a system to ensure that accreditation bodies, certification bodies and certified entities are notified in a timely manner of any substantive change in management procedures. This is defined as changes which affect scheme rules and procedures for accreditation and/or certification. Where the scheme outsources responsibility of notification to accreditation bodies or certification bodies, there is a requirement for certification bodies to have a procedure for this notification and guidance on how this should take place (timeframe, manner, channel, etc.).

Examples of evidence for scheme alignment:

- contracts/agreements with accreditation bodies and certification bodies regarding notification of changes, internal procedure/qualityhandbook for change management, ring information flow.

#### Conclusion

The IRFM Cert. Prog. is in alignment because the Certification Requirements include following clauses:

9.0 Revision of IRFF Responsible Fisheries Management Specification

9.1 The CB shall after a notification from IRFF inform Accreditation Body and Clients of any revision of IRFF Responsible Fisheries Management Specification and transition period.

#### References

- IRFF Certification Requirements
- Internal document IRFF Certification Requirements Version



## B . 2 E V I D E N C E O F A L I G N M E N T

### B2.15

9.2 Certified fisheries should be given a period of at least three years to come into compliance with the revised Specification.

10.0 Other changes

10.1 The CB shall after a notification from IRFF inform Clients, Certified Enterprises and Accreditation Body of any changes in the management procedures which may affect certification. IRFF notifies CB notifies AB and certified enterprises.

1.1 dated 24 April 2016.  
Sections 9 & 10.

### B2.16

GSSI Component	Guidance	References
<p>The Scheme Owner clearly defines the criteria relating to the classification of non-conformities. Where the Scheme Owner allows for certification of an entity with non-compliances, the Scheme Owner requires that:</p> <ul style="list-style-type: none"> <li>- only non-conformities on minor, non-critical issues are allowed;</li> <li>- a timeline for closing out corrective actions must be defined;</li> <li>- a system to verify that corrective actions have been closed out is in place.</li> </ul>	<p>The Scheme Owner defines the criteria related to rating the severity of non-conformities for certification bodies. If Scheme allows for certified entities with non-compliances, these can only be (All must be met): minor/non-critical, with a defined timeline for closing out and a mechanism defined to verify resolution.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> <li>- contract/agreement between the Scheme Owner and the certification body, certification requirements/methodologies specifying classifications of non-conformities and conditions for allowing certification with non-compliances.</li> <li>- guidance specifying procedures and process for classifying nonconformities and conditions for issuing certification, audit reports.</li> </ul>	
<b>Conclusion</b>		<b>References</b>

## B . 2 E V I D E N C E O F A L I G N M E N T

### B2.16

The IRFM Cert. Prog. is in alignment because of the criteria outlined in Certification Requirements, detailed in the following: 6.8, Scoring Method and 6.9, Confidence Ratings and Assignment of Non Conformances specifying that a critical non-conformance will essentially stop the assessment (not allowing for certification). Furthermore, a closing out time line and verification is specified in 6.10 Corrective Action Plans.

Also, note that the CB does not direct the fishery in the course of corrective action, this is the responsibility of fishery managers. The CB must confirm that the intended actions will meet the intent of the clause and then track (surveillance) the fishery to confirm that managers implement their commitments. IRFF certification requires the fishery to identify the time lines to progress and meet corrective actions and within the five year period.

- IRFF Certification Requirements
  - Internal document IRFF Certification Requirements Version 1.1 dated 24 April 2016. Section 6.

### B2.17

GSSI Component	Guidance
<p>The Scheme Owner has defined the qualifications and competence criteria required by auditors and audit teams, employed by certification bodies, and it makes this information publicly available.</p>	<p>The Scheme Owner defines the requirement for certification body auditor and audit teams qualifications and competency and these requirements are publicly available. Competencies and qualifications include knowledge in the standard, education, experience and personal attributes.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> <li>- contract/agreement between the Scheme Owner and the accreditation body/certification body, accreditation/certification requirements/methodologies specifying criteria for each function,</li> <li>- auditor assessment and training records,</li> <li>- auditor CVs.</li> </ul>

## B . 2 E V I D E N C E O F A L I G N M E N T

### B2.17

Conclusion	References
<p>The IRFM Cert. Prog. is in alignment because the Certification Requirements include following paragraphs:</p> <p>4.3 Competency of Personnel and Assessors,                      4.4 Assessor Basic Qualification Criteria,                      4.5 Additional Lead Assessor Qualifications, and                      4.6 Assessor Competency Criteria.</p>	<ul style="list-style-type: none"> <li>• IRFF Certification Requirements</li> <li>• Internal document IRFF Certification Requirements Version 1.1 dated 24 April 2016. Clauses 4.3, 4.4, 4.5, 4.6</li> <li>• <u>Surveillance team</u></li> </ul>

### B2.18

GSSI Component	Guidance
<p>The Scheme Owner requires certification body auditors to have successfully completed training in the scheme to the satisfaction of the Scheme Owner.</p>	<p>The Scheme Owner defines the requirement for certification body auditor training in the standard including initial and ongoing development.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> <li>- contract/agreement between the Scheme Owner and the accreditation body/certification body, accreditation/certification requirements/methodologies specifying criteria for each function.</li> <li>- auditor assessment and training records.</li> </ul>
Conclusion	References

## B . 2 E V I D E N C E O F A L I G N M E N T

### B2.18

The IRFM Cert. Prog. is in alignment because of the criteria outlined in Certification Requirements:

4.4. Assessors shall have completed an IRFF fishery assessor course covering the assessment, procedural requirements and reporting requirements.

- IRFF Certification Requirements
  - Internal document IRFF Certification Requirements Version 1.1 dated 24 April 2016. Clause 4.4.4;

### B2.19

GSSI Component	Guidance
The Scheme Owner requires that certification body auditors successfully complete auditor training based on ISO 19011. This does not include technical experts seconded to audit teams.	<p>The Scheme Owner defines the requirement for certification body auditors to have successfully completed (passed) training based on ISO 19011 Guidelines for auditing management systems) and that the audit team includes at least one auditor. Technical experts can supplement auditor expertise, but are not formally auditors and do not count as an auditor.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> <li>- contract/agreement between the Scheme Owner and the accreditation body/certification body, accreditation/certification requirements/methodologies specifying criteria for each function.</li> <li>- auditor assessment and training records.</li> <li>- auditor CVs.</li> <li>- audit Reports.</li> </ul>
Conclusion	References

## B . 2 E V I D E N C E O F A L I G N M E N T

### B2.19

The IRFM Cert. Prog. is in alignment because, although Certification Requirements do not specifically require ISO 19011, the essence of the components is covered in 4.5.1. Lead Assessors shall have completed either an internal or external ISO auditor training course which covers audit application techniques, objective assessment, impartiality and ethics in third party auditing.

IRFF requires that the Certification Bodies (CB's) wishing to apply for approval for the operation of an accredited third party certification scheme for the IRFF Scheme must be accredited to ISO/IEC Guide 65 / ISO 17065 "General requirements for bodies operating certification systems".

Virtual office visit - review of CB contracts including CVs

- [GT Assessor Criteria Required for. Site Assessor, Group Entity Assessor for FAO Chain of Custody Standard](#)
- Clause 2.1
- IRFF Certification Requirements
- Internal document IRFF Certification Requirements Version 1.1 dated 24 April 2016. Chapters 3.1, 3.2, 4.3 and clause 4.5.1 Certification Requirements;

### B2.20

#### GSSI Component

The Scheme Owner requires that certification bodies include the following in their competence assessment of auditors:

- an assessment of knowledge and skills for each fundamental area the auditor will be expected to be working,
- an assessment of knowledge of pertinent fishery and /or aquaculture Programs and the ability to access and be able to apply relevant laws and regulations,

#### Guidance

The Scheme Owner defines the requirement for certification bodies to include all of the elements in the Essential Component in the management of personnel competence (ISO 17065 clause 6.1.2).

Examples of evidence for scheme alignment:

- contract/agreement between the Scheme Owner and the certification body, accreditation/certification requirements/ methodologies specifying requirement,

## B . 2 E V I D E N C E O F A L I G N M E N T

### B2.20

- an assessment of the personal attributes of the auditor, to ensure they conduct themselves in a professional manner,
- a period of supervision to cover the assessment fishery and/or aquaculture principles, specific audit techniques and specific category knowledge,
- a documented sign off by the certification body of the satisfactory completion of assessment requirements.

- guidance outlining the system and criteria for competencies, training, etc. (see B.2.17–B2.19, 21–22),
- auditor assessment and training records,
- auditor CVs,
- accreditation body reports.

#### Conclusion

The IRFM Cert. Prog. is in alignment because of the criteria specified in Certification Requirements 4.3–4.6, which outline requirements on knowledge, skills, personal attributes and monitoring and addressing GSSI components.

#### References

- IRFF Certification Requirements
- Internal document IRFF Certification Requirements Version 1.1 dated 24 April 2016. Chapters 4.3, 4.4, 4.5 and 4.6;

### B2.21

#### GSSI Component

#### Guidance

The Scheme Owner requires that certification body lead auditors maintain category and scheme knowledge.

The Scheme Owner defines the requirement for certification body lead auditors to have and maintain the necessary training, technical knowledge and experience to ensure consistent and accurate audits.

Examples of evidence for scheme alignment:

- contract/agreement between the Scheme Owner and the certification body, accreditation/certification requirements/methodologies specifying requirement,
- guidance outlining the system and criteria for lead auditors,
- lead auditor assessment and training records,

# B . 2 E V I D E N C E O F A L I G N M E N T

## B2.21

- lead auditor CVs,
- accreditation body reports.

### Conclusion

The IRFM Cert. Prog. is in alignment because the Certification Requirements state that all assessors are required to have sector and scheme knowledge. Furthermore they include following relevant paragraphs:

4.4.4 Assessors shall have completed an IRFF fishery assessor course covering the assessment, procedural requirements and reporting requirements.

4.4.5 CB's shall confirm understanding of all assessors in IRFF Scheme specific training as part of their qualification including knowledge of the FAO criteria derived from the Guidelines for the Eco-labeling of fish and fishery products from marine capture fisheries and relevant clauses from the FAO Code of Conduct for Responsible Fisheries.

Scheme procedures require that lead auditor competence is maintained at a level sufficient to direct the assessment team in accordance with IRFF procedures. This may include at least a minimum of one annual audit but also requires CB's to ensure that adequate control of competence is maintained in accordance with and as demonstrated by ISO17065 accreditation.

The current CB ensures that lead auditors do take part in annual audits and also undertake training to ensure competence is maintained, for example where up-date improvements in Certification Requirements are implemented. Clause 4.5.2 in Certification Requirements states "CB's shall provide Lead Assessors with instruction and training as required, in the additional responsibilities of directing and coordinating an assessment team."

IRFF also get details per each assessment with qualifications.

Virtual office visit - review of CB contract and auditor CVs

### References

- IRFF Certification Requirements
- Internal document IRFF Certification Requirements Version 1.0 dated 17 July 2015. Clauses 4.4.4, 4.4.5, 4.5.2

# B . 2 E V I D E N C E O F A L I G N M E N T

## B2.22

GSSI Component	Guidance	
<p>The Scheme Owner requires that certification bodies have a continuing professional development program in place that provides auditors with current best practice for fishery and/or aquaculture.</p>	<p>The Scheme Owner defines the requirement for certification body auditor ongoing professional development to maintain current best practice in sector.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> <li>- contract/agreement between the Scheme Owner and the accreditation body/certification body, accreditation/certification requirements/methodologies specifying criteria for continuous professional development,</li> <li>- auditor training, assessment and training records.</li> </ul>	
Conclusion	References	
<p>The IRFM Cert. Prog. is in alignment because it is covered in detail in following paragraphs of the Certification Requirements:</p> <p>4.6 Continued Training and Competency Monitoring</p> <p>4.6.1 CB's shall ensure that assessors are kept up to date with and understand any revisions to the Scheme assessment and reporting requirements provided by IRFF that come into effect or implemented by the CB in order to remain consistent with the Scheme Requirements.</p> <p>Monitoring for functioning:</p> <p>4.6.2 The CB shall maintain written records of all relevant training and training evaluation undertaken by contracted and full time assessors.</p>	<ul style="list-style-type: none"> <li>• IRFF Certification Requirements</li> <li>• Internal document IRFF Certification Requirements Version 1.1 dated 24 April 2016. Chapter 4.6 Certification Requirements</li> </ul>	



**B2.22**

4.7 Internal Audit and Performance. Global Trust has internal audit system that identifies issues then training required. Requests for updates/changes from IRF would incorporate into internal training procedures, including signing off of changes, added to training deck if standard specific.

## B.3 EVIDENCE OF ALIGNMENT

B3.01	
GSSI Component	Guidance
<p>The Scheme Owner requires that all certified products are identified and segregated from non-certified products at all stages of the supply chain.</p>	<p>The Scheme Owner requires clear identification and separation of certified from non-certified product at all stages of the supply chain.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> <li>- Chain of Custody standards, audit checklists, certification requirements/methodologies specifying requirement.</li> <li>- Chain of Custody audit reports.</li> </ul>
Conclusion	References
<p>The IRFM Cert. Prog. is in alignment because the CoC requirements includes the following paragraphs:</p> <p>3.1 All Seafood products carrying the official certified label from certified fisheries must be kept readily identifiable and where necessary kept clearly separated from products of non-certified fisheries at all times.</p> <p>2.2 Certified seafood inputs must be kept separate from non-certified seafood inputs throughout seafood processing, distribution and marketing if they are to carry the official certified label. This may be achieved by:</p> <ul style="list-style-type: none"> <li>- Physical separation</li> <li>- Temporal separation.</li> </ul>	<ul style="list-style-type: none"> <li>• Certificates <ul style="list-style-type: none"> <li>• COCICE128 Þorbjörn hf Certificate 2023-2026..pdf</li> </ul> </li> <li>• Certificates <ul style="list-style-type: none"> <li>• COCICE118 Samherji (dalvik) Certificate 2023-2026.pdf</li> </ul> </li> <li>• Certificates <ul style="list-style-type: none"> <li>• COCICE114 Rammi hf Certificate 2023-2026[51].pdf</li> </ul> </li> <li>• <a href="#"><u>IRF Chain of Custody</u></a> <ul style="list-style-type: none"> <li>• clause 1.3, 2.2</li> </ul> </li> </ul>

# B . 3 E V I D E N C E O F A L I G N M E N T

## B3.02

GSSI Component	Guidance
<p>The Scheme Owner requires all entities that are physically handling the certified product to undergo a Chain of Custody audit by an accredited certification body if the product can be destined for retail sale as a certified, labelled product.</p> <p>Exceptions: No audit is required for storage and distribution of tamper-proof, packaged products.</p>	<p>The Scheme Owner requires all entities in a supply chain that physically handle the product and where there is the possibility of mixing undergo a Chain of Custody audit if the product will be claimed as certified or carry a label. Entities in the supply chain which do not take physical control or only handle storage and distribution in tamper proof packaging need to be identified, but do not require a Chain of Custody audit.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> <li>- contract/agreement between the Scheme Owner and the accreditation body/certification body, certified entity, certification requirements/methodologies defining types of operations and activities that require auditing according to these requirements,</li> <li>- Chain of Custody reports.</li> </ul>
Conclusion	References
<p>The IRFM Cert. Prog. is in alignment because the CoC requirements include following paragraphs:</p> <p>3.4 Each stage in the seafood supply chain must be required to be able to track and trace the certified product one step forward and back to the Certified Fishery.</p> <p>Page 8: The Applicant will be awarded certification for their handling Stage in the supply chain if it is clear that it meets the Chain of Custody Specification.</p> <p>Each of the Applicants relevant products at their handling stage and each prior handling stage in the supply chain identified in the Applicant's Application Form will be required to be assessed against the Chain of Custody Specification by the Certification Body before full Chain of Custody Certification is awarded.</p>	<ul style="list-style-type: none"> <li>• Certificates</li> <li>• COCICE114 Rammi hf Certificate 2023-2026[51].pdf</li> <li>• COCICE118 Samherji (dalvik) Certificate 2023-2026.pdf</li> <li>• COCICE128 Þorbjörn hf Certificate 2023-2026..pdf</li> <li>• <a href="#"><u>IRF Chain of Custody</u></a></li> <li>• Clause 3.4 and page 8</li> </ul>

# B . 3 E V I D E N C E O F A L I G N M E N T

## B3.02

The starting point of IRF CoC specification is when companies will need to comply with the specific that has been determined as; the second point of ownership of the certified fish or when the certified fish catch is sold directly overseas to foreign customers or is auctioned off in overseas ports. The end point will be when the fish is sealed in a tamper proof consumer pack, or when the fish is finally consumed. The scope of the CoC defines those entities that need CoC and those that are excepted from it.

Virtual office visit - review of CB contract and auditor CVs

## B3.03

GSSI Component	Guidance
<p>The Scheme Owner requires certification bodies to verify that all entities within the chain maintain accurate and accessible records that allow any certified product or batch of products to be traceable from the point of sale to the buyer.</p>	<p>The Scheme Owner defines the requirement for certification bodies that all entities within the supply chain, including those which may not undergo a Chain of Custody audit (see B.3.02), maintain up to date, complete and accessible records that allow for full traceability of the product along the entire supply chain.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> <li>- Chain of Custody standard.</li> <li>- contract/agreement between the Scheme Owner and the certification body, accreditation/certification requirements/ methodologies specifying criteria for document control and maintenance.</li> <li>- auditor checklists.</li> </ul>

# B . 3 E V I D E N C E O F A L I G N M E N T

## B3.03

### Conclusion

The IRFM Cert. Prog. is in alignment because the CoC requirements state that the Applicant must operate a system that allows any product or batch of products sold by the organization as originating from a certified fishery to be verified through documentation.

Documentation must be available that verifies the identity of the Certified seafood as originating from a certified fishery.

Traceability records must be available any time when required from any related businesses, for any reason, and must be accurate, legible and unadulterated. Furthermore, the requirements include the following:

3.9. A record of all certified seafood received must be maintained, showing the name of the supplier, their unique chain of custody certificate number, evidence of certificate validity, and sufficient other details to allow the tracing of those inputs back to their suppliers and the certified fishery.

3.10. Traceability records must be available any time when required from any related businesses, for any reason, and must be accurate, legible and unadulterated.

### References

- [CoC Requirement](#)
- clauses 3.9, 3.10 and 3.11

## B3.04

### GSSI Component

The Scheme Owner requires that entities are able to demonstrate that these

### Guidance

The Scheme Owner ensures that certified entity takes full responsibility that all subcontractors fully meet Chain of Custody requirements and has a system to demonstrate this.

# B . 3 E V I D E N C E O F A L I G N M E N T

## B3.04

Chain of Custody requirements are met by the enterprise's subcontractors.	Examples of evidence for scheme alignment: - sub-contract agreements, internal audits. If the Scheme Owner does not allow sub-contracting then this is aligned (as opposed to Not Applicable)
Conclusion	References
The IRFM Cert. Prog. is in alignment because it is covered in the CoC standard 2019 clause 1.8 Where the company utilises the services of a subcontractor (carrying out contract processing, packing or labelling activities), the subcontractor shall be certified to the IRFM chain of custody standard. as well as present in the DRAFT unified CoC Standard version 2.0 issued in 2021, Clause 1.7 1.7 Where the Applicant utilizes the services of a subcontractor (carrying out contract processing, packaging, or labelling activities), the Subcontractor shall be certified to the RFM Chain of Custody Standard.	<ul style="list-style-type: none"> <li>• GT internal quality procedures</li> <li>• issue 27th of June 2022</li> <li>• QP3b .docm</li> <li>• <u><a href="#">Unified CoC Standard</a></u></li> <li>• January 2022</li> </ul>

## B3.05

GSSI Component	Guidance
The Scheme Owner has or requires certification bodies to have documented procedures for auditing methods and	The Scheme Owner has or ensures certification bodies have documented Chain of Custody audit methodologies including: validity of certificate cannot exceed 3 years, frequency of audits takes into consideration risk factors and an onsite audit is required when substantive changes to the certified

# B . 3 E V I D E N C E O F A L I G N M E N T

## B3.05

frequency of audits that meet the following requirements:

- certificate validity does not exceed 3 years;
- periodicity depends on risk factors
- changes to an entity’s traceability system that are deemed to affect the integrity of the Chain of Custody result in a re-audit (onsite).

entities traceability system take place. These are instances where the integrity of the Chain of Custody could be affected such as company mergers, major new markets.

Examples of evidence for scheme alignment:

- requirements in the contract/agreement between the Scheme Owner and the certification body, in a separate accreditation manual or for example in certification requirements/methodologies.
- guidance interpretation specifying frequency, auditing methods and risk factors, in order to support consistency between certification bodies.

### Conclusion

The IRFM Cert. Prog. is in alignment because certificates are valid for three years with annual re-assessments. More detailed requirements on audit surveillance frequency based on risk assessment is to be found in the internal Global Trust manual NSF QB 2022 for CoC. Clause 3.12 Audit Frequency

The certificate will have a duration of three years and the client’s compliance will be checked by surveillance audits that are conducted at a defined audit frequency.

Surveillance audits are scheduled at 12-month intervals (except for traders) following the initial audit.

Surveillance audits for traders are scheduled at 18-month intervals following the initial audit

An audit window either side of this date by up to 4 calendar months can be used to ensure that product is being processed/packed/handled. However there must a minimum of 6 months between audits.

However, the Certification Body ultimately reserves the right to determine Surveillance Audit frequency based upon the inherent product/process risk as well as the results of a client’s prior audits.

### References

- Quality procedures for RFM Chain of Custody
- Internal document – issued 27th of June 2022

# B . 3 E V I D E N C E O F A L I G N M E N T

## B3.06

GSSI Component		Guidance
<p>The Scheme Owner requires the certification body to record all identified breaches of the chain of custody, including:</p> <ul style="list-style-type: none"> <li>- an explanation of the factors that allowed the breach to occur;</li> <li>- an explanation of the corrective actions required to ensure that a similar breach does not re-occur;</li> <li>- the time frames for the corrective actions to be completed; and</li> <li>- the date of closing out of the corrective actions and how the problem was solved.</li> </ul>		<p>The Scheme Owner requires of certification bodies to document all breaches of Chain of Custody with explanation of contextual factors, corrective actions, and timeframes for corrective actions, date of closing and resolution.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> <li>- certification requirements/methodologies defining requirements of reports, contract or agreement specifying requirements, mandatory template reports.</li> <li>- Chain of Custody audit report.</li> </ul>
Conclusion	References	
<p>The IRFM Cert. Prog. is in alignment because the Assessment Report will identify any non conformances against the Chain of Custody Specification. Applicants will be required to close out non-conformances through corrective actions.</p>	<ul style="list-style-type: none"> <li>• quality procedures for RFM Chain of Custody</li> <li>• internal document -section 3.5 Audit Procedures page 4, and section 3.6 Non- conformance follow up page 5</li> </ul>	

## B3.07

GSSI Component	Guidance
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# B . 3 E V I D E N C E O F A L I G N M E N T

## B3.07

The Scheme Owner requires that certification body audit reports include:

- the date of the inspection/audit;
- the name(s) of the person(s) responsible for the audit and report;
- the names and addresses of the sites inspected/audited;
- the scope of the inspection/audit;
- the non-conformities identified;
- the result of at least one mass balance assessment for each product covered by the Chain of Custody audit; and
- a conclusion on the conformity of the client with the Chain of Custody requirements.

The Scheme Owner requires of certification bodies that all Chain of Custody audit reports include all of the elements in the Essential Component.

Examples of evidence for scheme alignment:

- certification requirements/methodologies defining requirements of reports, mandatory template reports.
- Chain of Custody audit report.

### Conclusion

The IRFM Cert. Prog. is in alignment because the CB assessment reports include all of the requirements that are applicable (no mass balance permitted).

### References

- Audit reports – all confidential documents
- COCICE 122 Vinnslustöðin hf - report 2023 Revised - RG approved.pdf
- 2023-05-09-COCICE108-UA-Akureyri - audit checklist - RG approved.pdf
- 2023-08-03-brim-nordurgardur-Form 10a Alaska RFM Single Site CoC Checklist Revised-RG approved.pdf
- quality procedures for RFM Chain of Custody
- internal document - sections 3.1to 3.3 page 2

## B3.08

GSSI Component

Guidance

# B . 3 E V I D E N C E O F A L I G N M E N T

## B3.08

The Scheme Owner requires certification bodies to file reports at their office and to make these reports available to relevant parties upon request.

Certification bodies are required to maintain files of Chain of Custody audit reports (paper or electronic) and make these available upon request to relevant parties, within contractual arrangements with certified entities.

Examples of evidence for scheme alignment:

- contracts, agreements, certification requirements specify Chain of Custody reports are filed and process for making them available.

### Conclusion

The IRFM Cert. Prog. is in alignment because the CB assessment reports are available and filed at CB office, in accordance to paragraph 139-140 of FAO Ecolabelling Guidelines. QP 3b, p8, section 3.14 . records

The Scheme's Client Service Administrator will ensure that all records, minutes and Certificates are in place. The following records relative to audits and certification decisions will be maintained on electronic file:

- Completed Signed Application (Form 2)
- Completed signed EMEA Proposal Document - Aqua Schemes (Form 5)
- Audit Plan Letter (Form 7);
- Completed Audit Report Forms (Forms 9)
- Client/Auditor-signed non Conformance and Evidence Management document (Form 13A);
- Completed Non Conformance and Evidence Management document, (Form 13A);
- Corrective Action Evidence;
- Relevant Certificate (Form 17);
- Completed Certification Record (Form 13b).

### References

- Audit reports – all confidential documents
- 2023-05-09-COCICE108-UA-Akureyri - audit checklist - RG approved.pdf
- COCICE 122 Vinnslustöðin hf - report 2023 Revised - RG approved.pdf
- 2023-08-03-brim-nordurgardur-Form 10a Alaska RFM Single Site CoC Checklist Revised-RG approved.pdf
- quality Procedures Manual for RFM (NSF- GTC)
- internal document - issue 27th of June 2022

# B . 3 E V I D E N C E O F A L I G N M E N T

B3.09		
GSSI Component	Guidance	
<p>The Scheme Owner requires that an enterprise certified entity keeps records that demonstrate conformity with the Chain of Custody requirements for a period that:</p> <ul style="list-style-type: none"> <li>- exceeds the shelf life of the certified product; and</li> <li>- exceeds the periodicity between audits</li> </ul>	<p>Certified entity must keep records documenting compliance with Chain of Custody standard requirements at a minimum time that is longer than a. the shelf life of the product and b. time between audits.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> <li>- Chain of Custody standard, guidance interpretation and audit checklist that specify document retention policy.</li> </ul>	
Conclusion	References	
<p>The IRFM Cert. Prog. is in alignment because entities that have the IRFM CoC are required to keep records for a reasonable period of time. CoC standard 2019 and CoC Standard (Unified version, 2022 - article 3.9).</p> <p>"Traceability records shall be kept for a reasonable period to correspond with the shelf life of the product with a minimum of three years. Traceability records shall be accurate, legible and unadulterated."</p>	<ul style="list-style-type: none"> <li>• IRFF Scheme Certification Requirements – internal document</li> <li>• <u><a href="#">Chain of Custody</a></u></li> <li>• clause 3.9</li> </ul>	

B3.10	
GSSI Component	Guidance

# B . 3 E V I D E N C E O F A L I G N M E N T

## B3.10

Where a scheme allows for Chain of Custody certification of multiple sites managed under the control of a single entity, the Scheme Owner defines specific audit procedures that ensure all sites comply with the Chain of Custody certification requirements. Control can include direct ownership, franchises, or where the entity has a signed agreement or contract with each site.

If the Scheme Owner does not allow Chain of Custody of multi-sites (prohibits not that it is not yet developed or exists) – requirement is “Not applicable”. Otherwise, the Scheme Owner defines audit procedure for multi-sites (under control of one entity) and requirements for internal control management system.

Examples of evidence for scheme alignment:

– Chain of Custody standard, guidance or checklist specifying procedure and internal control system.

### Conclusion

The IRFM Cert. Prog. is in alignment because a system is in place to manage group clients, while currently, there are no such clients.  
Q3b NSF 2022 outlines in Annex 1.....PROCEDURE FOR MULTI SITE CHAIN OF CUSTODY EVALUATION AND REPORTING  
CoC standard 2019 page 6 Multisite Certification: this certification is applicable to any multi-site organization handling or trading certified products where the organisation does not have a designated central office function. In this case every site under the scope of certification complies with section 1to 4 of this IRFM chain of custody standard.

### References

- [Chain of Custody Standard](#)
- unified version ( IRF and CSC), pages 4 and 5 describe the system in place for multi-site organisations
- quality Procedures Manual for RFM (NSF- GTC)
- issue 27th June 2022

## B3.11

GSSI Component

Guidance

# B . 3 E V I D E N C E O F A L I G N M E N T

## B3.11

Where the Scheme Owner allows for multisite certification, they require that all sites are assessed as part of the internal audit during the period of validity of the certificate.

The Scheme Owner does not allow Chain of Custody of multi-site requirement is “Not applicable”. Otherwise, the Chain of custody standard requires all sites are assessed as part of the internal audit during the validity period of the certificate.

Examples of evidence for scheme alignment:  
- standard, guidance interpretation and audit checklist.

### Conclusion

The IRFM Cert. Prog. is in alignment because while currently there are no group clients, a system is in place to manage them if the situation arose. Global Trust Internal Document QP3b Quality Manual CoC. Section 5, page 11 covers multi site.  
CoC Draft Unified Standard 2022. Section ADDITIONAL MULTI – SITE CHAIN OF CUSTODY STANDARD REQUIREMENTS page 12 outlines 7.5 7.5 There shall be an internal audit plan, checklist, and schedule available to cover the central office and member sites.

### References

- [Chain of Custody Standard](#)
- multisite certification, page 4
- quality procedures for RFM Chain of Custody
- multisite membership: appendix section 5, page 11



**SECTION D.  
FISHERIES  
CERTIFICATION  
STANDARDS**



## D.1 EVIDENCE OF ALIGNMENT

D.1.01	
GSSI Component	Guidance
<p>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.</p>	<p>A "fisheries management organization or arrangement" is defined by FAO (see Glossary). This term is used throughout the benchmarking framework and is intended to represent the "designated authority" mentioned in paragraphs 29.2 (36.2) and 29.4 (36.5) of the FAO Ecolabelling Guidelines. In this context it is essentially an entity holding the legal and generally recognized mandate for establishing fisheries management measures and taking management decisions such that those measures and decisions are legally enforceable. Where the stock under consideration is a transboundary fish stock, straddling fish stock, highly migratory fish stock or high seas fish stock it might also encompass a Regional Fisheries Management Organization (RFMO) – see Essential Component D.1.07. The fisheries management organization or arrangement may also be part of relevant traditional, fisher or community approaches to the management of the stock under consideration, provided their performance can be objectively verified (i.e. the knowledge has been collected and analyzed through a systematic, objective and well-designed process, and is not just hearsay).</p>
Conclusion	References
<p>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</p>	<ul style="list-style-type: none"> <li>• <a href="#"><u>IRF Fisheries Management Standard 2.1</u></a></li> <li>• <a href="#"><u>Government of Iceland</u></a></li> </ul>



# D.1 EVIDENCE OF ALIGNMENT

## D.1.01

(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.

## D1.01.02

### GSSI Component

The standard requires that in giving due recognition to the requirements and opportunities of small-scale fisheries the fishery management organization or arrangement adopts measures for the long-term conservation and sustainable use of fisheries resources and to secure the ecological foundation for food production.

### Guidance

To meet the parent Essential Component, the fishery management organization or arrangement is expected to be fit for purpose. This is tested through the other Essential Components that assess the performance and content of the management system. This Supplemental Component looks more specifically at the adoption of measures that secure the ecological foundation for food production, in the context of giving due recognition to the requirements and opportunities of small-scale fisheries. With respect to the requirements and opportunities of small-scale fisheries, it is important to recognize that tenure rights are balanced by duties and that small-scale fisheries should utilize fishing practices that minimize harm to the aquatic environment and associated species and support the sustainability of the resource.

### Conclusion

### References

# D.1 EVIDENCE OF ALIGNMENT

## D1.01.02

The IRFM Standard v2.1 is in alignment; in context- Icelandic fisheries opportunities are managed on a transferable quota system which include all components of the Icelandic fleet fishing Icelandic waters; large scale and small scale and across all eligible gear types. The IRFM Standard has been developed to reflect the inclusive nature of Icelandic fisheries management, and noting that the IRF Standard scope is applicable only to Icelandic fisheries. In this context, there are several clauses that assess to what extent due recognition to the requirements and opportunities of small-scale fisheries are provided for by the fishery management organization when adopting measures for the long-term conservation and sustainable use of fisheries resources and to secure the ecological foundation for food production.

These are:

1.1.6 Fisheries shall be regulated in such a way as to avoid the risk of conflict among fishers using different vessels, gear and fishing methods. Where conflict arises appropriate venues and means shall be available for conflict resolution.

Giving recognition for the needs of small scale fishers to have sufficient access to opportunities, fishing areas and afforded a legal system that is transparent, accessible and effective governance in the event of conflict between fleet segments arising.

1.1.10 The Fisheries Management Plan shall also consider the following:

1.1.10.1 The specific management method/approach or measures, according to fleet or jurisdiction or other relevant variables as appropriate;

1.1.10.5 Provisions for considerations and consultation with the fishing industry and relevant authorities.

1.1.10.7 The objectives and management measures relevant to ecosystem effects of the fishery.

### *1.2 Research and Assessment*

1.2.1 A competent research institute or arrangement shall collect and/or compile the necessary data and carry out scientific research and assessment of the state of fish stocks and the condition of the ecosystem. Research results shall be made public in a timely and readily understood fashion. In the

- [2020 reassessment report for Cod](#)
- [IRF Fisheries Management Standard 2.1](#)
- [IRFM Haddock 2nd Surveillance Report 2021](#)

## D1.01.02

course of research and stock assessment, relevant traditional, fisher and/or community information and/or knowledge shall be sought by the researchers through appropriate means/fora.

The standard assesses each management plan to ensure it has sufficient provision across all fleet components within its measures, ensures effective consultation across all segments, including small scale fleet segments for both research data and management purposes.

2.3.1.3 The catch quota of each vessel or vessel group for each fish species and fishing year **shall be** recorded in the official central data base in a transparent manner.

2.3.1.4 Information on the size and composition of the fleet of fishing vessels **shall be** available, documented and include the following provisions:

- 1) An officially maintained fishing vessel registry;
- 2) Participation in the fishery must be subject to licence;
- 3) Only vessels on the fishing vessel registry shall be authorised to participate in the fishery;
- 4) For the stock under consideration, the allowed catch by species for each vessel or vessel group **shall be** specified.

The Standard assesses the management system with regard to ensuring all vessels and segments, regardless of size are permitted to fish, have a transparent allocation (share) of the total catch. This affords the same rights of small scale fishers within the overall fishery for an allocation of the TAC.

IRFM Standard has been developed and continues to be implemented in accordance with the FAO Guidelines for Eco-labeling of Fish and Fishery Products from marine capture fisheries, 2005 including extensions, and among other provisions:

- Is voluntary in nature and market-driven.
- **Is transparent, including balanced and fair participation by all interested parties.**
- Is non-discriminatory, does not create unnecessary obstacles to trade and allows for fair trade and competition.
- Is based on the best scientific evidence available, also taking into account traditional knowledge of the resources provided that its validity can be objectively verified.

# D.1 EVIDENCE OF ALIGNMENT

## D1.01.02

- Is practical, viable and verifiable.  
All eligible Icelandic registered fishing vessels form part of the Unit of Certification.

## D1.01.03

### GSSI Component

The standard requires that the fishery management organization or arrangement is able to coordinate and integrate its activities with other relevant institutions that have mandates for or are active in the ecosystem in which the fishery of which the unit of certification is part is operating (e.g. other relevant ministries), and that respective roles and responsibilities are clarified.

### Guidance

To meet the parent Essential Component, the fishery management organization or arrangement is expected to be fit for purpose. This is tested through the other Essential Components that assess the performance and content of the management system. This Supplementary Component looks more specifically at the requirement for the fishery management organization or arrangement to coordinate and integrate its activities with other relevant institutions that have mandates for or are active in the ecosystem in which the fishery of which the unit of certification is part is operating. The standard must require that their respective roles and responsibilities are clarified.

### Conclusion

The IRFM Standard is in alignment with this component, as it requires that the fishery management organisation is able to coordinate and integrate its activities with other relevant institutions that have mandates for or are active in the ecosystem. There are numerous examples of this contained in the IRFM Standard, two of which are 1.4.1 "For the stock under consideration the harvesting policy (including its consistency with the precautionary approach), stock

### References

- [IRFM Standard revision 2.1](#)

# D.1 EVIDENCE OF ALIGNMENT

## D1.01.03

assessments and advice shall be reviewed, by request from the fisheries management authorities at appropriate, regular intervals as well as when substantive changes are made in harvesting policy by an appropriate international scientific body or committee." and 1.5.9 "The competent fisheries management authorities shall cooperate and actively participate in competent Regional Fisheries Management Organisation(s) (RFMOs) or arrangement(s), relevant to the stock under consideration and management agreements reached shall be implemented by fisheries authority and effectively and uniformly executed".

The IRFM Standard v2.1 is in alignment because the following examples from previous certification reports provide evidence that the management system is assessed to confirm that it coordinates and integrates its activities with other relevant institutions that have mandates for or are active in the ecosystem in which the fishery of which the unit of certification is part is operating.

Evidence

### **Re-assessment Report For The Icelandic Cod (*Gadus morhua*) Commercial Fisheries; SAI Global/Global Trust 2019**

Page 76 ' clause 1.1.10.1 The FMP also explains that quotas are derived by applying the harvest rule to the outcome of the yearly stock assessment, performed with approved methodology by the ICES NWWG (Clause 1.2.1), and finally decided by the Ministry taking advice from MFRI and industry stakeholders (see Clause 1.1.5 for further details).

Page 78 Clause 1.2.1: MFRI has wide international cooperation in all major fields of marine science, as indicated by its publication record<sup>89</sup>. MFRI participates in providing annual stock assessment and international advice by ICES, which for the cod is done by the ICES North Western Working Group (NWWG).

Page 79 clause 1.2.2 The cod stock is assessed using a forward running statistical catch-at-age model (ADCAM) fitted to catch numbers at age and indices at age from bottom trawl surveys in the spring and in the autumn. Landings data are provided by the Fisheries Directorate. Age distributions and weights and maturities at age are obtained from samples taken by MFRI from catches and in surveys. The surveys are extensive and cover the whole

- [Redfish Re assessment final report July 2019](#)

## D1.01.03

Icelandic shelf. The data are considered adequate for the assessment method. The assessment method has developed since 2002 and was last reviewed and endorsed by ICES in 2015. A revision is planned in 2021.

Clause 1.2.6 Iceland is member of ICES, which is a key forum for scientific and management activities and cooperation. Iceland cooperates with several international organisations, in particular NEAFC and NAFO.

Furthermore, the Icelandic government has cooperation agreements with Norway, Russia, Greenland, EU and the Faroe Islands

Clause 1.2.7: The Icelandic cod stock is not considered a shared stock by scientist or managers, although there can be some traffic of larvae from Iceland to Greenland and occasional migrations of adult fish from Greenland to Iceland. Stock assessment is carried out in cooperation between the interested nations within the NWWG in ICES.

This is also the case for the evaluation of management plan.

<https://www.responsiblefisheries.is/media/1/irf-cod-re-assessment-report-final-03feb2020.pdf>

**Re-assessment Report For The Icelandic Golden Redfish (*Sebastes norvegicus*) Commercial Fisheries SAI Global/Global Trust 3<sup>rd</sup> July 2019**

Within the independent assessment teams description of Icelandic fisheries, concerning Redfish, page 27 states: The MRI is an active participant in the work of the International Council for the Exploration of the Sea (ICES) and its advisory Committee on Fisheries Management. The stock assessment findings of the MFRI are subject to review by ICES before the TAC recommendations are made. The MFRI is also represented in several other organizations, such as the Northeast Atlantic Fisheries Commission (NEAFC), the Northwest Atlantic Fisheries Organization (NAFO), the North Atlantic Marine Mammal Commission (NAMMCO) and the International Whaling Commission (IWC).

**Clause 1.2.6 Iceland is member of ICES, which is a key forum for scientific and management activities and cooperation. Iceland has cooperation with several international organisations, in particular NEAFC and NAFO. Furthermore, the Icelandic government has cooperation agreements with Norway, Russia, Greenland, EU and The Faroe Islands.**

The publication record of MFRI clearly shows broad international cooperation on published scientific work.98

# D.1 EVIDENCE OF ALIGNMENT

## D1.01.03

Iceland has cooperation with several international organisations, in particular NEAFC and NAFO. Furthermore, the Icelandic government has cooperation agreements with Norway, Russia, Greenland, EU and The Faroe Islands. These are bilateral fisheries agreements as well as control agreements and agreements regarding catch information and information on fisheries and the monitoring of fishing activity through satellite driven vessel monitoring systems (VMS).

## D1.01.04

### GSSI Component

The standard requires that the fishery management organization at a minimum, shall:

- identify interested parties and oversee the formulation of the management objectives;
- translate, in cooperation with the interested parties, these objectives into management plans and define the criteria upon which decisions and regulatory measures will be based, evaluated and adjusted as necessary;
  - ensure implementation of the management measures through monitoring control and surveillance; and
- coordinate the collection and analysis of information and data necessary to allow responsible fisheries management

### Guidance

To meet the parent Essential Component, the fishery management organization or arrangement is expected to be fit for purpose. This is tested through the other Essential Components that assess the performance and content of the management system. This Supplemental Component lists several specific activities from the FAO Technical Guidelines for Responsible Fisheries. No. 4. Fisheries management that the fishery management organization or arrangement is required to undertake. These are not inconsistent with the parent Essential Component, but are specified in greater detail in the Supplemental Component.

### Conclusion

The IRFM Standard is in alignment with this component, as it requires that a structured fisheries management system shall be adopted and implemented (clause: 1.1.1). As part of this requirement, a fisheries management plan shall be documented and managed by the competent authorities (Clause 1.1.7). This is further evidenced in clause 1.1.10.5 where the FMP "provides for considerations and consultation with the fishing industry and relevant authorities". Clause 1.2.1

### References

[IRFM Standard revision 2.1](#)

# D . 1 E V I D E N C E O F A L I G N M E N T

## D1.01.04

requires that a competent research institute or arrangement shall collect and/or compile the necessary data and carry out scientific research and assessment of the state of fish stocks and the condition of the ecosystem. Research results shall be made public in a timely and readily understood fashion. Clause 2.2.2 requires monitoring, surveillance and information feedback shall be used to collate information on actual catch. Clause 2.3.2. requires that amounts by species and fishing area shall be estimated and continually recorded in fishing logbooks on-board the fishing vessels; Clause 2.3.2.14 requires that the weight (whole weight or gutted weight) by species of all catches of "stock under consideration" and by-catch species shall be measured by authorized harbor officials at landing and recorded in the official central database (date, vessel, gear type, location, species, quantity); Clause 2.3.5.1 requires analysis shall be carried out with the aim of detecting any deviations that may occur of the actual total catch from the Total Allowable Catch (TAC).



# D.1 EVIDENCE OF ALIGNMENT

D1.02	
GSSI Component	Guidance
<p>The standard requires that in order for the fishery management organization or arrangement to receive and respond to in a timely manner the best scientific evidence available (D.1.03–D.1.05) the fishery management organization or arrangement convenes regularly, as needed, to manage the integrated process of information collection, stock assessment, planning, formulation of the management objectives and targets, establishing management measures and enforcement of fishery rules and regulations.</p>	<p>The focus of this Essential Component is the capacity of the fishery management organization or arrangement to receive and respond to in a timely manner the best scientific evidence available. The FAO Ecolabelling Guidelines do not specify a requirement for any specific frequency or type of meetings of the fishery management organization or arrangement. Paragraph 29.3 refers to the requirement for timely scientific advice on the likelihood and magnitude of identified impacts of the fishery on the ecosystem. Principle 2.10 of the Guidelines requires that schemes be based on the best scientific evidence available. Best scientific evidence available is defined in the Glossary as a process by which scientific advice is commissioned and solicited by the management system. The wording of this Essential Component is intended to ensure that the Standard requires that this is done in a timely and organized way that is properly documented.</p> <p>The CCRF also uses the word "timely" in many places in describing requirements for responsible fisheries management, e.g. Article 6.13 "timely solutions to urgent matters"; Article 7.4.4: "timely, complete and reliable statistics on catch and fishing effort are collected and maintained in accordance with applicable international standards and practices and in sufficient detail to allow sound statistical analysis. Such data should be updated regularly and verified through an appropriate system."; Article 12.3 requires that States should ensure that data generated by research are analyzed, that the results of such analyses are published, respecting confidentiality where appropriate, and distributed in a timely and readily understood fashion, in order that the best scientific evidence is made available as a contribution to fisheries conservation, management and development.</p>
Conclusion	References
<p>The IRFM Standard is in alignment with this component, as the process of responding in a timely manner to the best scientific evidence available is best described in a number of Fisheries Certification reports. For</p>	<p><a href="#"><u>IRFM Haddock 2nd Surveillance Report 2021</u></a></p>

# D.1 EVIDENCE OF ALIGNMENT

## D1.02

example, pages 80 and 81 of the the IRFM Haddock Reassessment Report (2019/2020). The is supported in the IRFM Standard under the following clauses: 1.2.1 A competent research institute or arrangement shall collect and/or compile the necessary data and carry out scientific research and assessment of the state of fish stocks and the condition of the ecosystem. Research results shall be made public in a timely and readily understood fashion. 1.2.6 There shall be active collaboration with international scientific organizations, with the aim of ensuring that the focus is on internationally acknowledged research and assessment methods that provide the best available information on the condition of the stock under consideration at any time. 1.4.1 For the stock under consideration the harvesting policy (including its consistency with the precautionary approach), stock assessments and advice shall be reviewed, by request from the fisheries management authorities at appropriate, regular intervals as well as when substantive changes are made in harvesting policy by an appropriate international scientific body or committee.

The IRM Standard v2.1 is in alignment because:

Clause 1.2.6 **There shall be active collaboration with international scientific organisations**, with the aim of ensuring that the focus is on internationally acknowledged research and assessment methods **that provide the best available information** on the condition of the stock under consideration **at any time**.

Clause 1.5.1; A competent scientific body, research institute, designated advisory body or arrangement shall provide the competent fisheries management authority with fisheries advice on the harvesting of the stock under consideration, **in a timely manner**. And clause 3.2.5.1; Management plans shall be **developed and implemented in a timely fashion** for avoiding, minimizing or mitigating any ecosystem issues properly identified. These shall be based on risk analysis and scientific advice, consistent with the precautionary approach, as being of serious concern in the fishery in question.

Clause 1.2.5. In the course of research and stock assessment, relevant traditional, fisher and/or community information and/or knowledge shall be sought by the researchers through appropriate means/fora.

The IRFM Standard v2.1 assesses the management system by requiring a fisheries management plan to be implemented with several specific requirements that refer to D.102 (convenes regularly) since Clause 1.1.10.5

## D1.02

Provisions for considerations and consultation with the fishing industry and relevant authorities in order that the fishery management plan (clause 1.1.7) establishes the provisions contained in clauses 1.1.8 (1 to 4) and 1.1.9 (1 to 4) and 1.1.10 (1 to 7). And clause 1.1.10.6 The means of implementing the management approach, including main provisions for monitoring, control, surveillance and enforcement. Also clause 1.4.1 requires regular reviews to be convened at appropriate, regular intervals as well as when substantive changes are made in harvesting policy by an appropriate international scientific body or committee. These provisions contained in the cited clauses ensure that an evaluation of the fishery management organization or arrangement regarding to what extent it 'convenes regularly, as needed, to manage the integrated process of information collection, stock assessment, planning, formulation of the management objectives and targets, establishing management measures and enforcement of fishery rules and regulations'.

- page 98 of 328 Iceland is member of ICES, which is a key forum for scientific and management activities and cooperation. Iceland actively cooperates with several international organisations, in particular NEAFC and NAFO. Furthermore, the Icelandic government has cooperation agreements with Norway, Russia, Greenland, EU and The Faroe Islands.
- Page 167 of 328 The timely and correct recording of catches in fishing logbooks is monitored by comparing the recorded catch amounts with the catch stored aboard the vessel at time of inspection. Inspections involve at-sea boardings by the Coast Guard and on fishing trips accompanied by Fisheries Directorate inspectors.
- Page 97 of 328 There is close communication between scientists and the fishing industry, both in formal meetings and through informal contact. There are specific consultation groups between fishermen and the MRFI that meet annually in December allowing fishermen (captains) to describe the fishing experience of the year and make comparisons with those previously. Logbooks are compulsory. Their information is not used directly in the stock assessment but is important fishing information for both managers and scientists.

# D.1 EVIDENCE OF ALIGNMENT

D1.02

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# D.1 EVIDENCE OF ALIGNMENT

D1.03	
GSSI Component	Guidance
<p>The standard requires that the fishery management organization or arrangement receives and responds to in a timely manner the best scientific evidence available regarding the status of the stock under consideration and the likelihood and magnitude of adverse impacts of the unit of certification on the stock under consideration and the ecosystem.</p>	<p>This essential component is about the taking into account of the best scientific evidence available by the Fishery Management Organization in a timely manner. This relates to both stock status and fishery impacts, hence all are mentioned in the component language. Best scientific evidence available is described in the Glossary. For the stock under consideration it can derive from assessments of stock status outside of what is regarded as a traditional “stock assessment”, accommodating techniques for data limited fisheries and including traditional knowledge, providing its validity can be objectively verified. The actions of the fishery management organization or arrangement in both receiving and responding to the best scientific evidence available must be in accordance with the Precautionary Approach (D.1.06). This Essential Component is also linked to those in D.3 that cover the collection and handling of data and information.</p>
Conclusion	References
<p>The IRFM Standard v2.1 is in alignment because:</p> <p>Clause 1.5.1 A competent scientific body, research institute, designated advisory body or arrangement <b>shall provide</b> the competent fisheries management authority with fisheries advice on the harvesting of the stock under consideration, <b>in a timely manner</b>.</p> <p>Clause 1.2.6 There shall <b>be active collaboration</b> with international scientific organisations, with the aim of ensuring that the focus is on internationally acknowledged research and assessment <b>methods that provide the best available information</b> on the condition of the stock under consideration <b>at any time</b>.</p> <p>Clause 1.2.7 In cases where the stock under consideration is a shared stock or a straddling stock or a highly migratory stock, <b>there shall be scientific cooperation</b> at the relevant bilateral, regional or international level for <b>obtaining data</b> and/or conducting stock assessments <b>and/or providing advice, as appropriate</b>.</p>	<ul style="list-style-type: none"> <li>• <a href="#"><u>3rd Surveillance report Cod</u></a></li> <li>• <a href="#"><u>IRFM Standard revision 2.1</u></a></li> </ul>

# D.1 EVIDENCE OF ALIGNMENT

## D1.03

Collectively, these clauses assess the management system and organisations to ascertain to what extent the system receives and responds to in a timely manner the best scientific evidence available regarding the status of the stock under consideration.

Further to this; Clause 3.1.1 Adverse impacts **of the fishery on the ecosystem** shall be considered and **appropriately assessed and effectively addressed**, consistent with the precautionary approach and Clause 3.1.2 Those impacts that are likely to have serious consequences shall be addressed. This **may take the form of an immediate management response** or further analysis of the identified risk.

These clauses of the IRFM Standard v.2.1 clearly demonstrate that the Standard assesses the management system of the Unit of Certification to ascertain ‘the likelihood and magnitude of adverse impacts of the unit of certification on the stock under consideration and the ecosystem’.

## D1.04

GSSI Component	Guidance
The standard requires that management objectives take into account the best	<p>This Essential Component applies to all management objectives referred to in Essential Components under Performance Area D.2.</p> <p>Best scientific evidence available is described in the Glossary. It can come from assessments of stock status outside of the typical “stock assessment”, accommodating techniques for data limited fisheries and including traditional knowledge,</p>

# D.1 EVIDENCE OF ALIGNMENT

## D1.04

scientific evidence available.

providing its validity can be objectively verified (i.e. the knowledge has been collected and analyzed through a systematic process, and is not simply hearsay).

Note that the requirement for the management system to take into account the best scientific evidence available is not inconsistent with the Precautionary Approach (see Essential Component D.1.06), which requires inter alia that the absence of adequate scientific information should not be used as a reason for postponing or failing to take conservation and management measures. Both of these requirements apply.

### Conclusion

IRFM Standard v2.1 is in alignment because clause 1.2.6 There shall be active collaboration with international **scientific organisations**, with the aim of ensuring that the focus is **on internationally acknowledged research** and assessment methods that provide **the best available information** on the condition of the stock under consideration at any time. The information is from scientific organisations, is based on acknowledged research and assessment methods and these clauses assess the management system to evaluate if information is ‘best scientific information available’. GSSI Guidance refers to ‘and including traditional knowledge, providing its validity can be objectively verified’. The IRFM Standard v2.1 addresses this aspect of the benchmark within clause 1.2.1 A competent research institute or arrangement shall collect and/or compile the necessary data and carry out scientific research and assessment of the state of fish stocks and the condition of the ecosystem. Research results shall be made public in a timely and readily understood fashion. In the course of research and stock assessment, **relevant traditional, fisher and/or community information and/or knowledge shall be sought by the researchers through appropriate means/fora.**

### References

- [IRFM Standard revision 2.1](#)

# D.1 EVIDENCE OF ALIGNMENT

D1.05	
GSSI Component	Guidance
<p>The standard requires that management measures implemented through the management system to achieve the management objectives are based on the best scientific evidence available.</p>	<p>This Essential Component applies to all management measures referred to in Essential Components under Performance Area D.5.</p> <p>Best scientific evidence available is described in the Glossary. Note that it includes traditional knowledge and can come from assessments of stock status outside of a typical stock assessment, accommodating techniques for data limited fisheries, providing their validity can be objectively verified (i.e. the knowledge has been collected and analyzed through a systematic process, and is not simply hearsay).</p> <p>Note also that the requirement for the management system to take into account the best scientific evidence available is not inconsistent with the Precautionary Approach (see Essential Component D.1.06), which requires inter alia that the absence of adequate scientific information should not be used as a reason for postponing or failing to take conservation and management measures. Both of these requirements apply.</p>
Conclusion	References
<p>The IRFM Standard v2.1 is in alignment because</p> <p>1.2.4 For the stock under consideration, the determination of suitable conservation and management measures shall include or take account of total fishing mortality from all sources in assessing the state of the stock under consideration, including:</p> <p>1.2.4.1 Estimates of discards;</p> <p>1.2.4.2 Unobserved and incidental mortality,</p> <p>1.2.4.3 Unreported catches and catches in other fisheries.</p> <p>1.2.6 There shall be <i>active collaboration with international scientific organisations</i>, with the aim of ensuring that the focus is on <i>internationally acknowledged research and assessment</i></p>	<p><a href="#"><u>IRFM Haddock 2nd Surveillance Report 2021</u></a></p>



# D.1 EVIDENCE OF ALIGNMENT

## D1.05

**methods** that provide the best available information on the condition of the stock under consideration at any time.

1.3.2.3.1 Information on the **biology, life-cycle and structure of the stock** shall be **taken into account** when designing management measures to promote optimal utilisation of the stock with respect to resilience to natural variability and fishing.

2.2.2 Monitoring, surveillance and **information feed-back shall be used** to collate information on actual catch. Corrective management measures and/or appropriate adjustments in management decisions shall be implemented when the need is indicated by the relevant information.

3.2.3.2 Management measures must take into account significant continuous stony coral areas, **identified through scientific and formal methods**.

2.3.3.5 Information on each vessels catch quota and quota use shall be **updated regularly and made public and accessible** to all on the official web-site, thus ensuring transparency.

2.3.5.1 **Analysis shall be carried out** with the aim of detecting any deviations that may occur of the actual total catch from the Total Allowable Catch (TAC). Measures are available and are adopted when indicated.

2.3.5.2 Anyone purchasing and/or selling catches shall be obligated to present reports to the appropriate authorities, containing information on the purchase, sale and other disposition of fish catches. **If analysis reveals discrepancy** between the information stated in the reports and the information received from the harbour weighing, corrective measures shall be taken when this is deemed appropriate.

3.2.1.1 Information **shall be** available on fishing gear used in the fishery, including the fishing gears' selectivity and its potential impact on the ecosystem. Stocks of non-target species commonly caught in the fisheries for the stock under consideration **may be monitored** and their state assessed, as appropriate

# D.1 EVIDENCE OF ALIGNMENT

## D1.05

3.2.1.2 Information *shall be available on the potential effect* of fishing on endangered, threatened and protected species, as appropriate and relevant in the context of the unit of certification.

Collectively, these clauses of the IRFM Standard v2.1 assess to what extent the Icelandic management system incorporates the best scientific evidence in the formulation of management measures.

# D.1 EVIDENCE OF ALIGNMENT

D1.06	
GSSI Component	Guidance
<p>The standard requires that the precautionary approach is applied widely through the management system to the conservation, management and exploitation of living aquatic resources in order to protect them and preserve the aquatic environment.</p>	<p>The General Principles and Article 6.5 of the CCRF prescribe a precautionary approach to all fisheries, in all aquatic systems, regardless of their jurisdictional nature, recognizing that most problems affecting the fishing sector result from insufficiency of precaution in management regimes when faced with high levels of uncertainty.</p> <p>The precautionary approach referred to in this Essential Component is that elaborated in the FAO Document: Precautionary approach to capture fisheries and species introductions, FAO Technical Guidelines for Responsible Fisheries. No. 2. Rome, FAO. 1996.</p> <p>To meet this Essential Component, the standard must require inter alia that the management system uses a suitable method of risk management to take into account relevant uncertainties in the status of the stock under consideration and the impacts of the unit of certification on that stock and the ecosystem, including those associated with the use of introduced or translocated species. Where the application of less quantitative and data demanding approaches results in greater uncertainty, the management system should apply more precaution, which may necessitate lower levels of utilization of the resource.</p> <p>The FAO Guidelines (Paragraph 29.6) state that the absence of adequate scientific information should not be used as a reason for postponing or failing to take conservation and management measures.</p> <p>The FAO Guidelines (Paragraph 31) note that much greater scientific uncertainty is to be expected in assessing possible adverse ecosystem impacts of fisheries than in assessing the state of target stocks. This issue can be addressed by taking a risk assessment/risk management approach (see also D.4.07).</p> <p>The FAO Guidelines (Paragraph 32) also note that a past record of good management performance could be considered as supporting evidence of the adequacy of the management measures and the management system. The suitability of the method of risk management applied should be assessed by the technical team undertaking the assessment for certification.</p>
Conclusion	References

# D.1 EVIDENCE OF ALIGNMENT

## D1.06

The IRFM Standard is in alignment with this component, as its precautionary approach to the conservation, management and exploitation of living resources is stated on Page 13 of the IRFM Standard in relation to section 1.3 Stock under Consideration, Harvesting Policy and Precautionary Approach. There are six conditions around PA, mainly 1.3.1.1, which states that it shall be implemented. Clause 1.4.1 "For the stock under consideration the harvesting policy (including its consistency with the precautionary approach), stock assessments and advice shall be reviewed, by request from the fisheries management authorities at appropriate, regular intervals as well as when substantive changes are made in harvesting policy by an appropriate international scientific body or committee." Clause 3.1.1 states that: "Adverse impacts of the fishery on the ecosystem shall be considered and appropriately assessed and effectively addressed, consistent with the precautionary approach". Clause 3.2.5.1 states "that management plans shall be developed and implemented in a timely fashion for avoiding, minimizing or mitigating any ecosystem issues properly identified, based on risk analysis and scientific advice, consistent with the precautionary approach, as being of serious concern in the fishery in question".

- [IRFM Standard revision 2.1](#)

# D.1 EVIDENCE OF ALIGNMENT

D1.07	
GSSI Component	Guidance
<p>Where the stock under consideration is a transboundary fish stock, straddling fish stock, highly migratory fish stock or high seas fish stock, the standard requires the existence of a bilateral, subregional or regional fisheries organization or arrangement, as appropriate that is concerned with the management of the whole stock unit over its entire area of distribution.</p>	<p>This Essential Component is intended to build on D.1.01 to provide greater specificity in the event that the stock under consideration is a transboundary fish stock, straddling fish stock, highly migratory fish stock or high seas fish stock. In this case, as well as the national authority with the legal and generally recognized mandate for establishing fisheries management measures and taking management decisions, there is expected to be an international institution or arrangement established (usually between two or more States) to be responsible for coordination of activities related to fisheries management over the entire area of distribution of the stock. This is to make sure that management of these stocks and fleets that fish on them is coordinated at the international level. Activities of the international institution or arrangement may include consultation between parties to the agreement or arrangement, formulation of fishery regulations and their implementation, allocation of resources, collection of information, stock assessment, as well as monitoring, control and surveillance (MCS). (e.g. a Regional Fisheries Management Organization – RFMO). See also CCRF Article 7.1.3 et seq. See also D.1.11, D.1.12 and D.1.13.</p>
Conclusion	References
<p>The IRFM Standard is in alignment with this component, as Clause 1.5.3 refers specifically to the "entire distribution range of the stock under consideration", which covers any transboundary fish stock, straddling fish stock, highly migratory fish stock or high seas fish stock. The IRFM Standard v2.1 is in alignment because :</p> <p>1.5.9 The competent fisheries management authorities shall cooperate and actively participate in competent Regional Fisheries Management Organisation(s) (RFMOs) or arrangement(s), relevant to the stock under consideration and management agreements reached shall be implemented by fisheries authority and effectively and uniformly executed.</p>	<p><a href="#"><u>Cod reassessment report 2020</u></a>  <a href="#"><u>Icelandic Tusk Commercial Fishery 2nd Surveillance Report 2021</u></a>  <a href="#"><u>IRFM Standard revision 2.1</u></a></p> <ul style="list-style-type: none"> <li>▪ Clause 1.5.3</li> </ul> <p><a href="#"><u>Iceland Redfish report July 2019</u></a></p>

# D.1 EVIDENCE OF ALIGNMENT

## D1.07

Summary of evidence referenced in the golden redfish 2019 report states 'Iceland participates in other fisheries and non-fisheries organisations/arrangements in the North Atlantic region.

For golden redfish, the scientific work is organized in ICES, and Iceland and Greenland have agreed on sharing the quota derived from the harvest rule'. A further extract from the report states that 'Iceland participates in other fisheries and non-fisheries organisations/arrangements in the North Atlantic region such as:

- The North East Atlantic Fisheries Commission (NEAFC137)
- The Northwest Atlantic Fisheries Organisation (NAFO138)
- The International Council for the Exploration of the Sea (ICES139)
- The North Atlantic Marine Mammal Commission (NAMMCO140)

Some of Iceland's commercially important fish stocks, including golden redfish, extend beyond its 200 nm EEZ and as a result are shared between countries/states; these shared stocks have necessitated the development of international cooperation. For golden redfish, the scientific work is organized in ICES, and Iceland and Greenland has agreed on sharing the quota derived from the harvest rule.

- P125 of 345 - auditor evaluation summary and details regarding the certification of Icelandic redfish.

# D.1 EVIDENCE OF ALIGNMENT

D1.08	
GSSI Component	Guidance
<p>The standard requires the governance and fisheries management system under which the unit of certification is managed to be both participatory and transparent, to the extent permitted by national laws and regulations.</p>	<p>Participatory is described in the Glossary. Principle 2.4 (2.5) of the FAO Guidelines requires ecolabelling schemes to be transparent, including balanced and fair participation by all interested parties. Requiring the standard also to require that the governance and management system being assessed is participatory and transparent (i.e. not just the scheme/ standard itself) is consistent with paragraph 6.13 of the CCRF, which states that: States should, to the extent permitted by national laws and regulations, ensure that decision making processes are transparent and achieve timely solutions to urgent matters. States, in accordance with appropriate procedures, should facilitate consultation and the effective participation of industry, fishworkers, environmental and other interested organizations in decision-making with respect to the development of laws and policies related to fisheries management, development, international lending and aid.</p> <p>To meet this Essential Component, the standard must require the fisheries management organization or arrangement to make information and advice used in its decision-making publicly available, to the extent allowed by national laws and regulations. While it is possible for an organization to be separately participatory or transparent, being one without the other is regarded as of much less value, hence both are needed to meet this Essential Component. A participatory approach to fisheries management requires there to be an opportunity for all interested and affected parties to be involved in the management process. This does not mean that stakeholders are necessarily required to have specific decision rights in the fishery, or that participatory mechanisms must be included in National laws, but there should be a consultation process that regularly seeks and accepts relevant information, including traditional, fisher or community knowledge and there should be a transparent mechanism by which the management system demonstrates consideration of the information obtained.</p>
Conclusion	References
<p>The IRFM Standard v2.1 is in alignment because it requires that the fisheries management system is evaluated regarding transparent participatory processes at fisher, national stakeholder and national and international research levels.</p> <p><b>1.1.5 Transparency</b> in the fisheries management and related decision-making process shall be ensured.</p>	<ul style="list-style-type: none"> <li>▪ <a href="#"><u>IRFM Standard revision 2.1</u></a> <ul style="list-style-type: none"> <li>• SECTION 2: COMPLIANCE AND MONITORING</li> </ul> </li> </ul>

# D.1 EVIDENCE OF ALIGNMENT

## D1.08

1.1.10 The Fisheries Management Plan shall also consider the following:

1.1.10.5 Provisions for considerations and consultation with the fishing industry and relevant authorities.

1.2.1 A competent research institute or arrangement shall collect and/or compile the necessary data and carry out scientific research and assessment of the state of fish stocks and the condition of the ecosystem. Research results shall be made public in a timely and readily understood fashion. In the course of research and stock assessment, *relevant traditional, fisher and/or community information and/or knowledge* shall be sought by the researchers through appropriate means/fora.

1.2.6 There shall be active collaboration with international scientific organisations, with the aim of ensuring that the focus is on internationally acknowledged research and assessment methods that provide the best available information on the condition of the stock under consideration at any time.

Iceland is member of ICES, which is a key forum for scientific and management activities and cooperation. Iceland cooperates with several international organisations, in particular NEAFC and NAFO. Furthermore, the Icelandic government has cooperation agreements with Norway, Russia, Greenland, EU and the Faroe Islands.

The FMP also explains that quotas are derived by applying the harvest rule to the outcome of the yearly stock assessment, performed with approved methodology by the ICES NWWG (Clause 1.2.1), and finally decided by the Ministry taking advice from MFRI and industry stakeholders (see Clause 1.1.5 for further details).

1.2.7 In cases where the stock under consideration is a shared stock or a straddling stock or a highly migratory stock, there shall be scientific cooperation at the relevant bilateral, regional or international level for obtaining data and/or conducting stock assessments and/or providing advice, as appropriate.

Whilst, the example in references to Icelandic cod, managed as a separate stock by Iceland, there is still an evaluation of the extent to which the management system transparently participates in external scientific and fish stock management processes:

- 2.1 Implementation, Compliance, Monitoring, Surveillance and Control:
- Clause 1.1.5
- Clause 1.1.6.

[Cod re-assessment report Feb 2020](#)

p68 of 342 of the Icelandic of Re-assessment Report Clause 1.1.5.

P76 of the same report:

Referring to clause 1.1.10.5

P76 of 342 of the same report

Referring to clause 1.2.1

And p96 referring to clause 1.2.6:

And p.97 referring to clause 1.2.7.

And p185 referring to clause 2.3.3.5



# D.1 EVIDENCE OF ALIGNMENT

## D1.08

'The cod in ICES Division 5a (Icelandic waters) is regarded as a separate stock and managed as such by Iceland. Stock assessment and evaluation of the management plan is done in cooperation between interested nations within the NWWG in ICES'.

Iceland operates a transferable quota system which is continually monitored, updated using a central database where fishers interact with the system on a daily basis. All catch data is reported and is publically available.

2.3.3.5 Information on each vessels catch quota and quota use shall be updated regularly and made public and accessible to all on the official web-site, thus ensuring transparency.

Information on each vessels' catch quota and quota use is updated in near real-time and is made public and accessible to all on the Fisheries Directorates web-site, thus ensuring transparency. The system is also evaluated to consider to what extent it is transparent an open to scrutiny with external scientific review processes.

1.4.1 For the stock under consideration the harvesting policy (including its consistency with the precautionary approach), stock assessments and advice shall be reviewed, by request from the fisheries management authorities at appropriate, regular intervals as well as when substantive changes are made in harvesting policy by an appropriate international scientific body or committee.

## D1.08.01

GSSI Component

Guidance

# D.1 EVIDENCE OF ALIGNMENT

## D1.08.01

The Standard requires the management system to encourage the participation of fishers in policy development, implementation and self-policing in order to promote greater voluntary compliance and improved enforcement of bycatch management measures.

In addition to the governance and fisheries management system being participatory and transparent, this Supplementary Component is seeking the inclusion in the standard of a requirement for the participation of fishers in policy development, implementation and self-policing.

### Conclusion

The IRFM Standard v2.1 is in alignment because it requires that the fisheries management system is evaluated to consider if it encourages the participation of fishers in policy development, implementation and self-policing in order to promote greater voluntary compliance and improved enforcement- for example, of bycatch management measures.

1.1.5 **Transparency** in the fisheries management and related decision-making process shall be ensured.

1.1.10 The Fisheries Management Plan shall also consider the following:

1.1.10.5 Provisions for considerations and consultation with the fishing industry and relevant authorities.

2.3.1.3 The catch quota of each vessel or vessel group for each fish species and fishing year *shall be* recorded in the official central data base in a transparent manner.

2.3.2.7 Discarding of catch from stock under consideration shall be prohibited. Discarding that may occur shall be monitored, e.g. by estimating amount of catch discarded due to size based high grading by species, season, gear type and area as feasible. The method for the monitoring of discards *shall be* specified.

2.3.2.11 In cases of mixed species catches, all commercial species shall be landed.

2.3.3.5 Information on each vessels catch quota and quota use shall be updated regularly and made public and accessible to all on the official web-site, thus ensuring transparency.

### References

- [3rd Surveillance Report Haddock](#)
- [IRFM Standard revision 2.1](#)
  - clause 2.1.1
- [Cod reassessment report feb 2020](#)
- Referring to p. 168 of 342 clause 2.3.2.9
- Referring to p. 168 of 342 clause 2.3.2.9
- [Tusk 2<sup>nd</sup> surveillance report dec 2021](#)
- Referring to p71 of 96 - clause 2.3.2.4
- Referring to p71 of 96 - clause 2.3.2.4

# D.1 EVIDENCE OF ALIGNMENT

## D1.08.01

2.3.2.9 Monitoring and control measures shall be in place and shall be conducted in a manner to encourage and demonstrate compliance (and deter unreported landings).  
 In summary, the system is assessed to consider fisher involvement in management processes that consider setting of TAC's and their allocation. The system is also assessed to consider to what extent all catches are landed and recorded in a publically accessible database, subtracted from vessel or vessel group quotas, discards are banned and all transfers of quota are available to all fishers. The system is evaluated under the clauses cited and considering 2.3.2.9 regarding self-policing in order to promote greater voluntary compliance and improved enforcement of bycatch management measures. Therefore, there is substantive evidence to demonstrate that IRFM Standard V2.1 is in alignment with GSSI Supplementary Component D1.08.01.

## D1.08.02

GSSI Component	Guidance
The Standard requires that bycatch and discard data are publicly available to promote transparency in bycatch management.	In addition to the governance and fisheries management system being participatory and transparent, this Supplementary Component is seeking the inclusion in the standard of a requirement for bycatch and discard data to be publicly available.
Conclusion	References
The IRFM Standard v2.1 is in alignment because 2.3.2.4 Catch amounts by species and fishing area shall be estimated and continually recorded in fishing logbooks on-board the fishing vessels. Discarding is banned and	<a href="#"><u>3rd Surveillance Report Haddock</u></a> <a href="#"><u>IRFM Standard revision 2.1</u></a>

# D.1 EVIDENCE OF ALIGNMENT

## D1.08.02

all catches must be recorded, landed and reported in the management system transferable quota database, which is publicly accessible.

3.2.2.1 Discarding, including discarding of catches from non-target commercial stocks, is prohibited.

2.3.2.7 Discarding of catch from stock under consideration shall be prohibited. Discarding that may occur shall be monitored, e.g. by estimating amount of catch discarded due to size based high grading by species, season, gear type and area as feasible. The method for the monitoring of discards **shall be** specified.

2.3.2.10 Catches **shall be** landed in authorised fishing ports. Authorised fishing ports provide the necessary facilities for handling and weighing of the catch.

2.3.2.11 In cases of mixed species catches, all commercial species shall be landed.

2.3.2.13 Catch shall be weighed by species at landing.

2.3.2.14 The weight (whole weight or gutted weight) by species of all catches of stock under consideration and by-catch species **shall be** measured by authorised harbour officials at landing and recorded in the official central data base (date, vessel, gear type, location, species, quantity).

2.3.3.5 Information on each vessels catch quota and quota use shall be updated regularly and made public and accessible to all on the official web-site, thus ensuring transparency.

clause 2.1.1.

- [2nd Surveillance Assessment Report Icelandic Ling Commercial Fisheries](#)
- [Full Assessment Report and Determination For The Icelandic Tusk Commercial Fisheries, Aug 2019.](#)

Referring to p91

# D.1 EVIDENCE OF ALIGNMENT

D1.08.05		
GSSI Component	Guidance	
<p>The standard requires, where applicable, that for a fisheries co-management system under which the unit of certification operates, the roles and responsibilities of concerned parties and stakeholders are clarified and agreed through a participatory and legally supported process. All parties shall be responsible for assuming the management roles agreed to. All endeavors should be made so that small-scale fisheries are represented in relevant local and national professional associations and fisheries bodies and actively take part in relevant decision-making and fisheries policy-making processes.</p>	<p>In addition to the governance and fisheries management system being participatory and transparent, this Supplemental Component is seeking the inclusion in the standard of a requirement for a co-management system within which, inter alia, the roles and responsibilities of concerned parties and stakeholders are clarified and agreed and all endeavors are made for small-scale fisheries to be represented in relevant local and national professional associations and fisheries bodies.</p> <p>Although an enabling legal system for co-management is often necessary, a legal framework is not a pre-requisite for an effective co-management arrangement. The roles and responsibilities of concerned parties and stakeholders may therefore be clarified and agreed through a participatory and customarily supported process.</p>	
Conclusion	References	
<p>The IRFM Standard is in alignment, as the fisheries co-management system is in place through all Icelandic fisheries and includes all fisheries, including small scale. Clause 1.1.10.5 provides for a participatory and legally supportive process, where it states "Provisions for considerations and consultation with the fishing industry and relevant authorities" (p. 11). The management roles and responsibilities of the co-management system are the instruments that form the FMP. See also information provided for D10104.</p> <p>IRFM Standard v2.1 is in alignment because an evaluation of the roles and responsibilities of concerned parties and stakeholders within the co-mangement system (a system that includes; a management authority, mandated research, monitoring and enforcement, fisher and stakeholder participation within a legal structure)</p>	<ul style="list-style-type: none"> <li>• <a href="#"><u>IRFM Standard revision 2.1</u></a></li> <li>• <a href="#"><u>3rd Surveillance Report Haddock feb 2020</u></a></li> <li>• P26-23</li> <li>• P59 provides evidence of the evaluation for Clause 1.1.1.</li> </ul>	

# D.1 EVIDENCE OF ALIGNMENT

## D1.08.05

are clarified and agreed through a participatory and legally supported process (documented in a fishery management plan) that described how All parties shall be responsible for assuming the management roles agreed to. The evaluation comprises several clauses that demonstrate that IRFM Standard v2.1 is in alignment with GSSI D108.05.

Clause 1.1.1. A structured fisheries management system shall be adopted and implemented.

1.1.7 Fishing for the “stock under consideration” shall be **managed by the competent authorities** in accordance with a documented and publicly available Fisheries Management Plan.

1.1.8 The Fisheries Management Plan **developed and adopted by the competent authorities** shall be formulated with due consideration to the following:

1.1.8.3 **Jurisdiction areas and the respective competent authorities** for the entire range of component stock(s) of “stock under consideration”;

1.1.10 The Fisheries Management Plan shall also consider the following:

1.1.10.1 The specific management method/approach or measures, **according to fleet or jurisdiction** or other relevant variables as appropriate;

1.1.10.3 **The institution(s) or arrangement(s) responsible** for providing stock assessment and advice;

1.1.10.5 Provisions for considerations and **consultation with the fishing industry and relevant authorities**.

1.2.1 **A competent research institute or arrangement shall collect and/or compile the necessary data** and carry out scientific research and assessment of the state of fish stocks and the condition of the ecosystem. Research results shall be made public in a timely and readily understood fashion. In the course of research and stock assessment, relevant traditional, fisher and/or community information and/or knowledge shall be sought by the researchers through appropriate means/fora.

1.2.7 In cases where the stock under consideration is a shared stock or a straddling stock or a highly migratory stock, **there shall be scientific cooperation at the relevant bilateral, regional or international level** for obtaining data and/or conducting stock assessments and/or providing advice, as appropriate.

1.5.6 Management measures for conservation and sustainable use of the stock under consideration shall be **specified in laws and regulations**.

# D.1 EVIDENCE OF ALIGNMENT

## D1.08.05

1.5.7 Practical implementation shall be the task of (a) **designated competent institution(s)**.

1.5.9 **The competent fisheries management authorities** shall cooperate **and actively participate in competent Regional Fisheries Management Organisation(s) (RFMOs) or arrangement(s)**, relevant to the stock under consideration and management agreements reached shall be **implemented by fisheries authority** and effectively and uniformly executed.

2.1.1 An effective legal and administrative framework at the local, national or regional level, as appropriate, **shall be established** for the fishery and **compliance shall be ensured** through effective mechanisms for monitoring, surveillance, control and enforcement.

2.1.2 Laws and regulations concerning conservation and management measures shall be publicly available and effectively disseminated.

2.3.2.1 A program for the monitoring and control of fishing vessel activities shall be operated and enforcement shall be in place to prevent fishing by unauthorised vessels.

# D.1 EVIDENCE OF ALIGNMENT

D1.09	
GSSI Component	Guidance
<p>The standard is applicable to governance and management systems for small scale and/or data limited fisheries, with due consideration to the availability of data and the fact that management systems can differ substantially for different types and scales of fisheries.</p>	<p>Being data limited is not necessarily synonymous with being small scale (hence the and/or in the Essential Component text), but the issues for fishery management may be similar.</p> <p>The scheme and standard should be applicable to any fishery that falls within the scheme's geographic scope, i.e. different types and scales of fisheries, including potentially small scale and/or data limited fisheries. If a scheme has a part of its standard that applies only to a subset of fisheries, such as small scale and/or data limited fisheries, then it needs to explain under what circumstances that part of the standard would be invoked. This same logic would apply to other potential subsets of fisheries such as deep sea, low trophic level, salmon etc. This should not mean, however, the standard for these subsets of fisheries is fundamentally different (e.g. lowered) compared to the standard applicable to other fisheries. Being applicable to small scale and/or data limited fisheries relates to being able to take into consideration different kinds of information and utilize different fishery management approaches in a risk management context. In order to be applicable to governance and management systems for small scale and data limited fisheries, the standard should also be applicable to relevant traditional, fisher or community approaches used by the fisheries management organization or arrangement to manage the unit of certification, provided their performance can be objectively verified. Evidence to verify the performance of the relevant traditional, fisher or community approaches would need to be established by the certification body implementing the standard and could be derived, for example, from the assessment of conformance with other GSSI Essential Components, in particular those covering the Stock and Ecosystem Status and Outcomes (D.6).</p> <p>If the scheme is generally applicable to all types of fisheries, (i.e. including small scale and/or data limited fisheries), then there is no need to explain the specific applicability, but in this case it may be harder for the scheme to demonstrate that the standard is indeed applicable to governance and management systems for small scale and/or data limited fisheries. In this context, it is important to recognize the great diversity of small-scale and/or data limited fisheries, as well as the</p>



# D.1 EVIDENCE OF ALIGNMENT

D1.09	
	<p>fact that there is no single, agreed definition of these terms (see the Glossary). Small-scale fisheries represent a diverse and dynamic subsector, often characterized by seasonal migration. The precise characteristics of the subsector vary depending on the location. Accordingly, GSSI does not prescribe a specific definition of small-scale fisheries or data limited fisheries.</p>
Conclusion	References
<p>The IRFM Standard v2.1 is in alignment because:</p> <p>Referring to the Unit of Certification (p9) of the IRFM Standard v2.1,</p> <p>The unit of certification is a Specific Icelandic Fishery (e.g. Cod, Haddock etc) for which certification is sought, as specified by the stakeholders (Applicant) who are seeking certification. Certification will normally refer to a National Fishery where the geographic distribution of the stock occurs within the jurisdiction of Icelandic fisheries management.</p> <p>The certification could encompass the whole fishery, where a fishery refers to the activity of one or more particular gear-type(s) or method leading to the harvest of one or more species; however, in certain cases, the unit of certification could also include a sub-component of a fishery, for example a national fleet fishing a shared stock; or several fisheries operating on the same resources.</p> <p>And referring to the 'Stocks under Consideration'</p> <p>The stock under consideration exploited by this fishery (unit of certification) may be one or more biological stocks as specified by the stakeholders for certification. In assessing compliance with this Standard, the impacts on the stock under consideration of all the fisheries utilizing that stock under consideration over its entire area of distribution are to be considered.</p> <p>A definition of small scale fisheries is not specified in the Standard since, a definition of small scale fisheries is not applicable, in the context of Iceland fisheries management situation. Fisheries are managed under species-stock specific management plans and arrangements that include all fleet segments within it, regardless of scale. Fleet segments include gear type, which are specified in the Units of Certification.</p>	<p><u><a href="#">Cod Re assessment Report feb 2020</a></u></p> <ul style="list-style-type: none"> <li>• <u><a href="#">IRFM Standard revision 2.1</a></u></li> </ul>

**D1.09**

For example; p15 of the Re-assessment Report For The Icelandic Cod (*Gadus morhua*) Commercial Fisheries (feb 2020) states:

The assessment team recommends that the management system of the applicant fishery, the Icelandic cod (*Gadus morhua*) commercial fisheries under state management by the Icelandic Ministry of Industries and Innovation, fished directly by **demersal trawl, long-line, gill net, Danish seine net, (and hook and line by small vessel gear)** and indirectly by **Nephrops trawls, shrimp trawls, pelagic trawls and purse seines** within Iceland's 200 nautical miles Exclusive Economic Zone (EEZ), be granted re-certification to the Icelandic Responsible Fisheries Certification Programme.

All fleet gear segments are included in the assessment for both directed and non directed bycatches and also the hook and line by small vessel gear, associated with coastal fishers.

Therefore, addressing the GSSI clause: D1.09: The standard is applicable to governance and management systems that exist in the Iceland context for small scale and/or data limited fisheries, that exist in the Iceland context, with due consideration to the availability of data and the fact that management systems can differ substantially for different types and scales of fisheries, considering the context of this clause within the fishery management system of Iceland.

Also note that, the The National Association of Small Boat Owners, Iceland (NASBO), whilst arguably is not defined as a small scale fishery, for the purposes of fulfilling the requirements as prescribed by this GSSI clause is an applicant in all of the current certified fisheries assessed by the IRFM Standard.

# D.1 EVIDENCE OF ALIGNMENT

D1.09.01	
GSSI Component	Guidance
The standard recognizes that the knowledge, culture and practices of small scale fisheries communities may inform responsible governance and sustainable development processes including co-management.	This Supplementary Component expands on the concept in the parent Essential Component requiring specific recognition of the contribution of the knowledge, culture and practices of small scale fishing communities to responsible governance and sustainable development processes. Co-management is mentioned specifically.
Conclusion	References
<p>All type of fisheries are covered under the IRFM Standard. Small-scale fisheries are part of the entire process as their data is used by Marine Research Fisheries Iceland (MRFI) in formulating the quotas and in collaboration with Fisheries Iceland is a collaboration with all stakeholders.</p> <p>The development of the first version of this standard was facilitated by the Fisheries Association of Iceland (FAI). The FAI was founded in 1911. The following (non-governmental) organizations are members of FAI: Fisheries Iceland (SFS), National Association of Small Boat Owners (NASBO), The Icelandic Seamen’s Federation (SSI), The Federation of General and Special Workers in Iceland (SGS), The Icelandic Union of Marine Engineers and Metal Technicians (VM), The Icelandic Ships Officers Association (FFSÍ). These represent all Icelandic fishery stakeholders. The Standard is inclusive. There are no small, scale artisanal fisheries in Iceland within the definition of GSSI. Hence, it makes no sense to include a statement that they are not eligible, when they do not exist.</p>	<ul style="list-style-type: none"> <li>• <a href="#"><u>IRFM Standard revision 2.1</u></a></li> <li>• <a href="#"><u>Cod re assessment report feb 2020</u></a></li> <li>• <a href="#"><u>Spawning Herring assessment report aug 2019</u></a></li> </ul>

## D1.09.01

There is no distinction made between small-scale fisheries and other fisheries in the IRFMS, then exclusion of SSF is not implied as potential "no alignment". Consequently, it may not be necessary to evidence this through specific clauses to meet GSSI component requirements.

Relevant clauses include:

2.3.1.3 The catch quota of each vessel or vessel group for each fish species and fishing year *shall be* recorded in the official central data base in a transparent manner.

1.1.6 Fisheries shall be regulated in such a way as **to avoid the risk of conflict among fishers using different vessels, gear and fishing methods**. Where conflict arises appropriate venues and means shall be available for conflict resolution.

1.1.10.5 Provisions for considerations and consultation with the fishing industry and relevant authorities.

1.2.1 A competent research institute or arrangement shall collect and/or compile the necessary data and carry out scientific research and assessment of the state of fish stocks and the condition of the ecosystem. Research results shall be made public in a timely and readily understood fashion. In the course of research and stock assessment, **relevant traditional, fisher and/or community information and/or knowledge shall be sought** by the researchers through appropriate means/fora.

In the February 2020 Cod re assessment report, clause 1.1.6 (p. 70) states that ITQ system gives fishermen the option and flexibility to target specific species and fishing grounds across the fishing year, and includes a small boat quota allocation. Clause 1.1.10.5 refers to provisions for considerations and consultation with the fishing industry and relevant authorities.

In the Spawning Herring assessment report, p. 50 states that *the Ministry makes the ultimate decisions on management. It has the authority to deviate from the advice but will only do so if there are strong reasons for that. Both the Ministry and MFRI have regular consultations with the industry which are further described in supporting rationales for Clauses 1.2.5, 1.5.5 and 3.1.1. In brief there are regular formal*

# D.1 EVIDENCE OF ALIGNMENT

## D1.09.01

*and informal communications between scientists, managers and industry as well as specific consultation groups that allow industry to describe their experiences of the fishing year in the context of past seasons. MFRI also publishes short newsletters regularly providing up-dates on stock analysis and related research outcomes.*

# D.1 EVIDENCE OF ALIGNMENT

## D1.09.02

### GSSI Component

The standard requires that the Management System, in accordance with national legislation, recognizes and respects all legitimate tenure right holders and their rights, particularly in small scale fishing communities, and takes reasonable measures to identify and record legitimate tenure right holders and their rights, whether formally recorded or not.

### Guidance

This Supplementary Component expands on its parent Essential Component by focusing specifically on the need to recognize and protect legitimate tenure rights in small scale fisheries, including the taking of reasonable steps to identify those tenure rights in small scale fishing communities where they may not already be formally recorded.

### Conclusion

All fishermen are covered under the IRFM Standard, and therefore by default all legitimate tenure right holders and their rights, particularly in small-scale fishing communities are respected.

The development of the first version of this standard was facilitated by the Fisheries Association of Iceland (FAI). The FAI was founded in 1911. The following (non-governmental) organizations are members of FAI: Fisheries Iceland (SFS), National Association of Small Boat Owners (NASBO), The Icelandic Seamen’s Federation (SSI), The Federation of General and Special Workers in Iceland (SGS), The Icelandic Union of Marine Engineers and Metal Technicians (VM), The Icelandic Ships Officers Association (FFSÍ).

These represent all Icelandic fishery stakeholders. The Standard is inclusive. There are no small, scale artisanal fisheries in Iceland within the definition of GSSI. Hence, it makes no sense to include a statement that they are not eligible, when they do not exist.

There is no distinction made between small-scale fisheries and other fisheries in the IRFMS, then exclusion of SSF is not implied as potential "no alignment". Consequently, it may not be necessary to evidence this through specific clauses to meet GSSI component requirements.

The IRFM Standard v2.1 is in alignment because:

### References

- [IRFM Standard revision 2.1](#)  
[Icelandic Tusk assessment report aug 2019](#)
- p40
  - P41; the Directorate can close certain areas for specific gears, if necessary.
  - p47
  - pages 72-74. Regarding the site visit of the assessment team; a description of the application of the quota system is provided.

## D1.09.02

1.1.5 **Transparency** in the fisheries management and related decision-making process shall be ensured.

Provides for an evaluation of to what extent decisions making process can be accessed.

1.1.6 Fisheries shall be regulated in such a way as to avoid the risk of conflict among fishers using different vessels, gear and fishing methods. Where conflict arises appropriate venues and means shall be available for conflict resolution.

Provides for an evaluation of to what extent the management system works to avoid conflict among fishers, such as those that could arise between different fleet segments, including smaller scale and coastal fishers.

1.1.10 The Fisheries Management Plan shall also consider the following:

1.1.10.1 The specific management method/approach or measures, according to fleet or jurisdiction or other relevant variables as appropriate;

Provides for an evaluation of to what extent the fisheries management system considers fleet structure and related dynamics within its formulation of management methods and rules.

1.1.10.5 Provisions for considerations and consultation with the fishing industry and relevant authorities.

Provides for an evaluation of to what extent consultation with the fishing industry, including those in the smaller scale vessel fleet is included.

2.3.1.1 Allocated catch quotas by species are assigned in such a way that the combined quotas conform with the currently effective decision on TAC.

Provides for an evaluation of to what extent that all segments of the fleet have are afforded access to fishing rights, including smaller scale vessels.

2.3.1.2 Commercial fishing *shall be* solely conducted with registered vessels authorised to participate in the fishery by the competent authorities.

Provides for an evaluation of to what extent the management system allocates authorisations to participate in the fishery, for all fleet components, including smaller scale vessels.

2.3.1.3 The catch quota of each vessel or vessel group for each fish species and fishing year *shall be* recorded in the official central data base in a transparent manner.

## D1.09.02

Provides for an evaluation of to what extent the management system ensures that all catch quotas, regardless of segment or vessel size, including smaller scale fishers is transparently recorded in the official database, which is transparently (publicly) accessible.

2.3.1.4 Information on the size and composition of the fleet of fishing vessels *shall be* available, documented and include the following provisions:

- 1) An officially maintained fishing vessel registry;
- 2) Participation in the fishery must be subject to licence;
- 3) Only vessels on the fishing vessel registry shall be authorised to participate in the fishery;
- 4) For the stock under consideration, the allowed catch by species for each vessel or vessel group *shall be* specified.

These clauses provide for an evaluation of to what extent all fleet segments of the fishery are afforded authorisation to fish and their entitlements (allowable catch) are specified.

2.3.3.4 Transfer of quota between vessels shall take effect only after it has been authorised and recorded to the official central data base.

Provides for an evaluation of to what extent access to fishing opportunities can be obtained or transferred, regardless of fleet segment, including smaller scale fishing vessels.

2.3.3.5 Information on each vessels catch quota and quota use shall be updated regularly and made public and accessible to all on the official web-site, thus ensuring transparency.

Provides for an evaluation of to what extent all fleet classifications must report catches, making them publically available which provides for a transparent system where all fishers, stakeholders have access to the same information.



# D.1 EVIDENCE OF ALIGNMENT

D1.10		
GSSI Component	Guidance	
<p>The standard requires that the fisheries management system under which the unit of certification is managed operates in compliance with local, national and international laws and regulations, including the requirements of any regional fisheries management organization that exercises internationally recognized management jurisdiction over the fisheries on the stock under consideration.</p>	<p>Under this Essential Component the standard requires that the fisheries management system must operate legally (locally, nationally and internationally); the legality of the fishery (i.e. compliance with applicable fishing regulations) is covered under other requirements in this Performance Area. The term "fisheries management system" is distinct from the "fishery management organization or arrangement" Both of these terms are defined in the glossary.</p> <p>For the purposes of clarity, this Essential Component includes compliance with the rules and regulations of any RFMO/A that exercises internationally recognized management jurisdiction over fisheries on the stock under consideration in the high seas and implementation of the United Nations General Assembly (UNGA) Resolution 61/105, paragraphs 76–95 concerning responsible fisheries in the marine ecosystem.</p>	
Conclusion	References	
<p>The IRFM Standard clause 2.1.1 stipulates that "An effective legal and administrative framework at the local, national or regional level, as appropriate, shall be established for the fishery and compliance shall be ensured through effective mechanisms for monitoring, surveillance, control and enforcement." With regard to international, clause 1.5.9 states that "The competent fisheries management authorities shall cooperate and actively participate in competent Regional Fisheries Management Organization(s) or arrangement(s), relevant to the stock under consideration and management agreements reached shall be implemented by fisheries authority and effectively and uniformly executed". Compliance with local, national and international laws and regulations is through enforcement by the Directorate of Fisheries as it monitors compliance with laws and regulations which apply to fishing, handling of commercial stocks and treatment catch and also enforcement by The Icelandic Coast guard who monitors commercial fishing vessels in Iceland's EEZ on a continuous basis.</p>	<p><a href="#"><u>IRFM Standard revision 2.1</u></a></p>	

# D.1 EVIDENCE OF ALIGNMENT

# D.1 EVIDENCE OF ALIGNMENT

D1.10.01	
GSSI Component	Guidance
<p>The standard requires the management system to include national policies, legal and institutional frameworks for the effective management of bycatch and the reduction of discards, including those measures agreed at an international level, for example by RFMOs in which they are members or participate as cooperating non-members.</p>	<p>This Supplemental Component puts a greater emphasis on the legal and institutional treatment within the management system of bycatch and reduction of discards. Specifically there is a need to see explicit policies and frameworks for their effective management, and incorporation within domestic legislation of bycatch and discard measures agreed internationally.</p>
Conclusion	References
<p>For clarification, the following definitions are used Annex 1 Glossary of the Standard p22-24</p> <p><b>Bycatch</b> - Discarded catch plus incidental catch.</p> <p><b>Discarded Catch</b> - That portion of the catch returned to the sea as a result of economic, legal, or personal considerations.</p> <p><b>Incidental Catch</b> - Retained catch of non-targeted species.</p> <p>The IRFM Standard v2.1 is in alignment because discards of catch from stocks under consideration is prohibited, as per clauses:</p> <p>3.2.2.1 Discarding, including discarding of catches from non-target commercial stocks, is prohibited.</p> <p>2.3.2.7 Discarding of catch from stock under consideration shall be prohibited. Discarding that may occur shall be monitored, e.g. by estimating amount of catch discarded due to size based high grading by species, season, gear type and area as feasible. The method for the monitoring of discards <i>shall be</i> specified.</p> <p>2.3.3.2 Limited allowance may be made for the use of quota for one species to count against landings of another species, with the objective of providing the necessary minimum flexibility and discouraging discards.</p> <p>2.3.5.1 Analysis shall be carried out with the aim of detecting any deviations that may occur of the actual total catch from the Total Allowable Catch (TAC). Measures are available and are adopted when indicated.</p>	<p><a href="#"><u>IRFM Standard revision 2.1</u></a></p> <p><a href="#"><u>Icelandic Tusk assessment report aug 2019</u></a></p>

# D.1 EVIDENCE OF ALIGNMENT

## D1.10.01

With regards to measurements implement at an international level, clause 1.5.9 states that "The competent fisheries management authorities shall cooperate and actively participate in competent Regional Fisheries Management Organization(s) or arrangement(s), relevant to the stock under consideration and management agreements reached shall be implemented by fisheries authority and effectively and uniformly executed".

Application of this can be seen in the Iceland Tusk Full Assessment Report and Determination For The Icelandic Tusk Commercial Fisheries on p.136 Referring to 3.2.2.1, where it states that Icelandic fishery law prohibits the discarding of all commercial stocks. Commercial species are listed yearly in documents such as the annual MFRI advice. Catches of these species are subjected to a discard ban (Regulation No. 57/1996) with inbuilt flexibility measures as previously discussed in Section 3.1. Monitoring for compliance is a responsibility of the at sea inspectors and the Coast Guard.

## D1.11

GSSI Component	Guidance
The standard requires that the fishery of which the Unit of Certification is a part is managed under an effective legal framework at the local,	Legal framework is described in the Glossary. An effective legal framework is one that is shown to be fit for purpose, such that the fishery seeking certification proceeds in an orderly and well controlled manner. An effective legal framework should enable the fisheries management organization or arrangement to perform its functions without hindrance from systemic and repeated illegal activity. An effective legal framework can be one that incorporates traditional, fisher or community approaches (e.g. co-management under community approaches) provided their performance can be objectively verified. With respect to fisheries in the high seas, the legal obligations of UNCLOS and

# D.1 EVIDENCE OF ALIGNMENT

D1.11	
national or regional (international) level as appropriate.	<p>UNFSA have particular relevance. See also Essential Component D.1.12 regarding the need for effective and suitable monitoring, surveillance, control and enforcement of the fishery of which the unit of certification is a part.</p> <p>Evidence of the performance of the legal framework can be derived from the assessment of conformance with other Essential Components, in particular D.1.12 and D.1.13 covering compliance and enforcement.</p>
Conclusion	References
<p>The IRFM Standard is in alignment with this component, as Clause 2.1.1 states that an effective legal and administrative framework at the local, national or regional level, as appropriate, shall be established for the fishery and compliance shall be ensured through effective mechanisms for monitoring, surveillance, control and enforcement. Examples of this can be found on p133-138 of the Re-assessment Report For The Icelandic Haddock Commercial Fisheries Feb 2020, an effective legal and administrative framework has been established through various fisheries management acts. Compliance is ensured through strict monitoring, control and enforcement carried out by the Directorate of Fisheries and the Icelandic Coast Guard. Laws and regulations concerning conservation and management measures are publicly available.</p>	<ul style="list-style-type: none"> <li>• <a href="#"><u>IRFM Standard revision 2.1</u></a></li> <li>• <a href="#"><u>Icelandic Haddock Assessment Report feb 2020</u></a></li> </ul>

# D.1 EVIDENCE OF ALIGNMENT

D1.12	
GSSI Component	Guidance
<p>The standard requires effective and suitable monitoring, surveillance, control and enforcement of the fishery of which the unit of certification is a part.</p>	<p>Effective and suitable monitoring, surveillance, control and enforcement is described in the Glossary. Evidence of high levels of compliance in the fishery of which the Unit of Certification is a part with all applicable local, national and international laws and regulations (as appropriate, per Essential Component D.1.10) would be indicative of effective monitoring, surveillance, control and enforcement. The suitability of monitoring, surveillance, control and enforcement for the fishery of which the Unit of Certification is a part should be assessed by the technical team undertaking the assessment for certification relative to the standard.</p> <p>Both this Essential Component and Essential Component D.1.11 (effective legal framework) derive from Paragraph 29.5 (36.6) of the Ecolabelling Guidelines which refers to “the fishery”. It is, therefore, the effective and suitable monitoring, surveillance, control and enforcement of the “fishery” (see Glossary) that is the subject of this Essential Component, and this may extend beyond the unit of certification (as per paragraph 25 of the Guidelines, the unit of certification could encompass: the whole fishery, where a fishery refers to the activity of one particular gear-type or method leading to the harvest of one or more species; a sub-component of a fishery, for example a national fleet fishing a shared stock; or several fisheries operating on the same resources). If the stock under consideration is not transboundary, then the Standard need only be concerned with the effectiveness and suitability of the monitoring, surveillance, control and enforcement activities at the national level for the fishery of which the Unit of Certification is a part. For transboundary stocks, however, there are several Essential Components that apply such that the Standard must be concerned with fishery management and compliance at the international level and the status of the whole stock across its entire range. Essential Component D.1.11 covers the need for an effective legal framework at the local, national or regional (international) level as appropriate and Essential Component D.1.13 covers the need for the Unit of Certification to be operating in compliance with the requirements of local, national and international law and regulations. Under Essential Component D.1.07, where the stock under consideration is a transboundary fish stock, straddling fish stock, highly migratory fish stock or high seas fish stock, the standard must require the existence of a bilateral, subregional or regional fisheries organization or arrangement (e.g. an RFMO), as appropriate, covering the stock</p>

# D.1 EVIDENCE OF ALIGNMENT

## D1.12

under consideration over its entire area of distribution. This is to make sure that management of these stocks and fleets that fish on them is coordinated at the international level. RFMOs are not generally responsible directly for monitoring, surveillance, control and enforcement; this is done by national authorities (i.e. of vessels operating within their waters of national jurisdiction and also of vessels flying their flag when they are fishing outside of those waters). If the Unit of Certification is part of a national fleet fishing on a transboundary stock, then it is still likely to be the effectiveness and suitability of the monitoring, surveillance, control and enforcement activities at the national level which is of prime importance for certification. If the Unit of Certification covers all the fishing on the stock under consideration, then the monitoring, surveillance, control and enforcement all of the national fleets is of concern. Note also that under Essential Component D.4.02 (assessment of the stock under consideration), the Standard must require assessment of the current status and trends of the stock under consideration to consider total fishing mortality on that stock from all sources, and under Essential Component D.6.01, the stock under consideration must not be overfished. Hence any deficiencies in the monitoring, surveillance, control and enforcement of fleets fishing on a stock under consideration that is a transboundary fish stock, straddling fish stock, highly migratory fish stock or high seas fish stock that compromise the effective assessment of the status of that stock would need to be of concern for certification.

Article 7.7.2 of the CCRF requires states to ensure that laws and regulations provide for sanctions applicable in respect of violations which are adequate in severity to be effective.

Article 7.7.3 of the CCRF requires states, in conformity with their national laws, to implement effective fisheries monitoring, control, surveillance and law enforcement measures including, where appropriate, observer programs, inspection schemes and vessel monitoring systems. Standards may refer to these mechanisms as appropriate.

### Conclusion

The IRFM Standard requires under clause 2.1.1 "An effective legal and administrative framework at the local, national or regional level, as appropriate, shall be established for the fishery and compliance shall be ensured through effective mechanisms for monitoring, surveillance, control and enforcement". Clause 2.3.2.9 "Monitoring and control measures shall be in place and shall be conducted in a manner to encourage and demonstrate compliance (and deter unreported landings)". Clause 2.3.4.1 " Rules shall be enforced. There

### References

[IRFM Standard revision 2.1](#)  
[Saithe 2<sup>nd</sup> Surveillance report dec 2021](#)

# D . 1 E V I D E N C E O F A L I G N M E N T

## D1.12

shall be penalties for serious infractions." Page 76-77 documents the enforcement of rules in the Icelandic Saithe Commercial Fishery 2nd Surveillance Assessment report December 2021.



# D.1 EVIDENCE OF ALIGNMENT

D1.12.01	
GSSI Component	Guidance
The standard requires effective and suitable monitoring, surveillance, control and enforcement of the unit of certification for management of bycatch and reduction of discards.	Effective and suitable monitoring, surveillance, control and enforcement of the unit of certification for management of bycatch and reduction of discards may be implicit within the parent Essential Component, but this Supplementary Component is seeking specific reference to the management of bycatch and reduction of discards in this context within the Standard.
Conclusion	References
<p>NB. The definition of 'bycatch' is described in Annex 1. Glossary of Terms, to mean 'Discarded catch plus incidental catch' (p. 22 - IRFM Standard v.2).</p> <p>The IRFM Standard is in alignment with this component, as Clause 2.3.2.7 (p. 17) prescribes that "Discarding of catch from stock under consideration shall be prohibited. Discarding that may occur shall be monitored, e.g. by estimating amount of catch discarded due to size based high grading by species, season, gear type and area as feasible. The method for the monitoring of discards shall be specified."</p> <p>Discards are further discouraged through means of clause 2.3.3.2 " Limited allowance may be made for the use of quota f or one species to count against landings of another species, with the objective of providing the necessary minimum flexibility and discouraging discards" and in Clause 3.1.1. – "Adverse impacts of the fishery on the ecosystem shall be considered and</p>	<p><a href="#"><u>3rd Surveillance report Cod</u></a></p> <p><a href="#"><u>Saithe Re assessment report feb 2020</u></a></p> <p><a href="#"><u>IRFM Standard revision 2.1</u></a></p> <ul style="list-style-type: none"> <li>▪ 2.1.1.</li> <li>▪ 2.3.2.4</li> <li>▪ 2.3.2.5</li> <li>▪ 2.3.2.6</li> </ul>

# D . 1 E V I D E N C E O F A L I G N M E N T

## D1.12.01

appropriately assessed and effectively addressed, consistent with the precautionary approach”

The method of monitoring of bycatch and discards is amply described in the 2nd Surveillance Assessment Report for Icelandic Cod Commercial Fishery, for example on page 24 under 'Discards' on how they are accounted for in the assessment, page 78 under 'Associated species catch and bycatch to the fishery' on how this is inspected and monitored, and in relation to enforcement the penalties for violations are described on page 84 as part of 'Context and updates'.

# D.1 EVIDENCE OF ALIGNMENT

D1.12.02	
GSSI Component	Guidance
<p>The standard requires that, in the case of small scale fisheries, monitoring, control, surveillance and enforcement systems are supported (resourced) and involve small scale fisheries actors as appropriate and promote participatory arrangements within the context of co-management. Small-scale fishers should support the monitoring, control, and surveillance and enforcement systems and provide to the State fisheries authorities the information required for the management of the activity.</p>	<p>In addition to the effective and suitable monitoring, surveillance, control and enforcement of the unit of certification in the parent Essential Component, this Supplementary Component requires the standard to include explicit promotion of participatory arrangements for these activities within the context of co-management.</p>
Conclusion	References
<p>The IRFM Standard v2.1 is in alignment because small scale fisheries, referred to as small scale vessel fishers, in the Icelandic content as with all fishing segments, are managed uniformly and consistently under the same fishery management system. All clauses referring to the management system performance specific to monitoring and control, are evaluated to determine to what extent the system is consistent with each fleet segment. The majority of smaller coastal vessels are grouped under The National Association of Small Boat Owners, Iceland (NASBO) who is an applicant and certified entity in all of the IRFM Certified fisheries.</p> <p>The topic of co-management and participatory arrangements are addressed in the Standard through clause 1.1.10.5 "Provisions for considerations and consultation with the fishing industry and relevant authorities" (p. 11) and 1.2.5 "In the course of research and stock assessment, relevant traditional, fisher and/or community information and/or knowledge shall be sought by the researchers through appropriate means/ fora" (p. 12).</p>	<p><a href="#"><u>IRFM Standard revision 2.1</u></a></p>

## D1.12.02

**An example of how the fishery management system is participatory regarding smaller coastal fishers is provided in the Icelandic Redfish Re-assessment Report.**

**<https://www.responsiblefisheries.is/media/1/form-9e-irf-icelandic-redfish-re-assessment-final-certification-report-july-2019.pdf>**

p 37. During the full assessment, the Fisheries Directorate, communicated to the Audit Team that the main reason for recently overshooting the redfish TAC is that there are considerable golden redfish bycatches in the targeted fisheries for cod/haddock in areas closer to the coast (as opposed to deep sea fisheries). Typically these are the small to medium sized vessels in the fleet with limited quota in golden redfish. As a result, they utilize the allowances for transfers between species to accommodate the accidental redfish catches in their quota portfolio. This is a relatively large part of the fishing fleet so small catches handled in this way eventually add up. Fiskistofa also highlighted that an attempt to incorporate these catches into the TAC (e.g. by increasing the catch quota) would mainly increase the catch quotas of the vessels that have high quota shares and are targeting golden redfish but would not help the vessels that are using the transferability option. On the other hand, stronger restrictions on transfer between species for the golden redfish may only increase the temptation for discarding – which at the moment is considered negligible<sup>36</sup>. Therefore, the flexibility measures within the Icelandic fishery management system impact the overall catches.

# D.1 EVIDENCE OF ALIGNMENT

D1.13	
GSSI Component	Guidance
<p>The standard requires that the Unit of Certification operates in compliance with the requirements of local, national and international law and regulations.</p>	<p>This requirement covers the compliance of the Unit of Certification with all applicable laws and regulations. Paragraph 28 (35) of the Ecolabelling Guidelines requires compliance both by the fishery and the management system. The requirement for the management system to be in compliance with applicable laws and regulations is addressed in Essential Component D.1.10.</p> <p>Conformance with this Essential Component should be considered alongside Essential Component D.1.12 – the requirement for effective and suitable monitoring, surveillance, control and enforcement. Conformance with this Essential Component requires there to be no evidence of systematic (methodical, regular, organized) or systemic (universal, throughout the system) non-compliance by fishers in the unit of certification with the requirements of local, national and international law and regulations. However, a lack of evidence of non-compliance by itself may not be sufficient if the monitoring, surveillance, control and enforcement is not effective and suitable for the fishery. Evidence of non-compliance may come from a variety of sources, including local and national monitoring, surveillance, control and enforcement programs, regional fisheries management organizations (RFMOs), and third party bodies such as industry organizations and non-governmental organizations. The Standard should require all of these sources to be consulted and taken into consideration.</p>
Conclusion	References
<p>The IRFM Standard v2.1 is in alignment because: Referring to the Unit of Certification (p9) of the IRFM Standard v2.1, The unit of certification is a Specific Icelandic Fishery (e.g. Cod, Haddock etc) for which certification is sought, as specified by the stakeholders (Applicant) who are seeking certification. Certification will normally refer to a National Fishery where the geographic distribution of the stock occurs within the jurisdiction of Icelandic fisheries management.</p>	<ul style="list-style-type: none"> <li>• <a href="#"><u>IRFM Standard revision 2.1</u></a></li> <li>• <a href="#"><u>Icelandic cod re assessment report feb 2020</u></a></li> </ul>

## D1.13

The certification could encompass the whole fishery, where a fishery refers to the activity of one or more particular gear-type(s) or method leading to the harvest of one or more species; however, in certain cases, the unit of certification could also include a sub-component of a fishery, for example a national fleet fishing a shared stock; or several fisheries operating on the same resources.

And referring to the 'Stocks under Consideration'

The stock under consideration exploited by this fishery (unit of certification) may be one or more biological stocks as specified by the stakeholders for certification.....In assessing compliance with this Standard, the impacts on the stock under consideration of all the fisheries utilizing that stock under consideration over its entire area of distribution are to be considered.

A definition of small scale fisheries is not specified in the Standard since, a definition of small scale fisheries is not applicable, in the context of Iceland fisheries management situation. Fisheries are managed under species-stock specific management plans and arrangements that include all fleet segments within it, regardless of scale. Fleet segments include gear type, which are specified in the Units of Certification.

For example; on p15 of the Re-assessment Report For The Icelandic Cod (*Gadus morhua*) Commercial Fisheries states:

The assessment team recommends that the management system of the applicant fishery, the Icelandic cod (*Gadus morhua*) commercial fisheries under state management by the Icelandic Ministry of Industries and Innovation, fished directly by demersal trawl, long-line, gill net, Danish seine net, (and hook and line by small vessel gear) and indirectly by Nephrops trawls, shrimp trawls, pelagic trawls and purse seines within Iceland's 200 nautical miles Exclusive Economic Zone (EEZ), be granted re-certification to the Icelandic Responsible Fisheries Certification Programme.

All fleet gear segments are included in the assessment for both directed and non directed bycatches and also the hook and line by small vessel gear, associated with coastal fishers.

# D . 1 E V I D E N C E O F A L I G N M E N T

## D1.13

Therefore, addressing the GSSI clause: D1.09: The standard is applicable to governance and management systems that exist in the Iceland context for small scale and/or data limited fisheries, that exist in the Iceland context, with due consideration to the availability of data and the fact that management systems can differ substantially for different types and scales of fisheries, considering the context of this clause within the fishery management system of Iceland.

Also note that, the The National Association of Small Boat Owners, Iceland (NASBO), whilst arguably is not defined as a small scale fishery, for the purposes of fulfilling the requirements as prescribed by this GSSI clause is an applicant in all of the current certified fisheries assessed by the IRFM Standard.

# D.1 EVIDENCE OF ALIGNMENT

D1.14	
GSSI Component	Guidance
<p>The standard requires the existence of documented management approaches or other management framework covering the unit of certification and the stock under consideration, including management measures consistent with achieving management objectives for the stock under consideration.</p>	<p>A documented management approach or other management framework is an important component of the Management System. It provides clarity and transparency with respect to how the system is intended to function. The establishment of management approaches for the stock under consideration may not be entirely within the purview of the fishery management organization or arrangement that manages the fishery of which the Unit of Certification is a part. The stock's distribution may extend beyond its area of jurisdiction and there may be other fisheries targeting the stock under consideration that fall under a separate administrative jurisdiction (potentially in another country). Nevertheless the management measures that apply to the unit of certification should be consistent with achieving management objectives for the stock under consideration.</p> <p>There is no uniform way that management approaches need to be documented (for example they do not have to be all within one overarching Fishery Management Plan), but the standard must require the various elements of the management system to be present and identifiable and in use by the fishery management organization or arrangement (D.1.01) , including the constitution and rules and procedures of the Fisheries Management Organization or Arrangement and the compliance regime (D.1.01–D.1.03; D.1.07); the legal framework (D.1.11); the management objectives (D.2); methodologies (D.4) although not necessarily all within one overarching Fishery Management Plan. It should be expected that the documentation would be current. The frequency of updates should be consistent with the requirements of meeting the management objectives and implementing management measures.</p>
Conclusion	References
<p>The IRFM Standard is in alignment with this component, as this element is covered in the IRFM Standard under Section 1.1, specifically in relation to requirement of having a documented management approach 1.1.7 "Fishing for the "stock under consideration" shall be managed by the competent authorities in accordance with a documented and publicly available Fisheries Management Plan." (p. 10).</p>	<p><a href="#"><u>IRFM Standard revision 2.1</u></a></p>



# D.1 EVIDENCE OF ALIGNMENT

## D1.14

Section 1.1 outlines the requirements of the fisheries management system and fisheries management plan on pages 10 and 11, like:

1.1.1 "A structured fisheries management system shall be adopted and implemented";

1.1.2 "The fisheries management objective shall be to limit the TAC from the fish stocks so that catches are in conformity with amounts allowed by the competent authorities";

1.1.3 "Appropriate measures for the stock under consideration shall be adopted and implemented";

1.1.8 and its related sub clauses, "The FMP shall be developed and adopted by the competent authorities and formulated with due consideration to the management unit, specification of stock or component stocks of "stock under consideration"; jurisdiction areas and the respective competent authorities for the entire range of component stock(s) of "stock under consideration" and the long-term harvesting policy, consistent with achieving optimum utilization, including the means for assurance of its consistency with the precautionary approach to fisheries management";

1.1.9 and its related sub clauses, "The FMP shall also specify: the long term objective(s) of the fisheries management, including target(s) for stock biomass and target value(s) or range(s) for fishing mortality or its proxy; limits with respect to precautionary management, including the limit reference point for stock size or its proxy and the limit reference point for fishing mortality or its proxy (e.g. harvest as a proportion of stock size, etc.), as well as remedial action to be taken if limits are approached or exceeded; the Standard of the applicable harvest control framework or harvest control rule, as appropriate; the primary approach applied to managing the fisheries (e.g. input controls, output controls, etc.).

### D1.14.01

GSSI Component

Guidance

# D.1 EVIDENCE OF ALIGNMENT

## D1.14.01

The standard requires that the documented management approaches or other management framework covering the unit of certification and the stock under consideration includes the provision of advice that contributes to the attainment of objectives for the management of bycatch and reduction of discards in the fishery of which the Unit of Certification is a part.

This Supplementary Component is seeking to ensure that the documented management approach or other management framework for the fishery of which the Unit of Certification is a part specifically includes management of bycatch and reduction of discards.

### Conclusion

NB. The IRFM Standard defines bycatch as "Discarded catch plus incidental catch" (p 22) and requires in clause 1.1.10.7 in relation to the fisheries management plan that " the objectives and management measures relevant to ecosystem effects of the fishery, and clause 3.2.2.1 states "Discarding, including discarding of catches from non target commercial stocks, is prohibited".

The IRFM Standard is in alignment with this component, as Discarding procedures are monitored through clause 2.3.2.7 "Discarding from stock under consideration shall be prohibited. Discarding that may occur shall be monitored, e.g., by estimating amount of catch discarded due to size based high grading by species, season, gear type and area as feasible. The method for monitoring of discards shall be specified" (p. 17), and 2.3.2.9 "Monitoring and control measures shall be in place and shall be conducted in a manner to encourage and demonstrate compliance (and deter unreported landings)" (p. 18)

Examples of this can be seen the Icelandic Redfish Re-Assessment Report in the References;

From p162 summary of evidence provided by the assessment team:

Discarding of golden redfish is prohibited. Discarding is monitored, by comparing the catches of vessels fishing in the vicinity of each other and, where unusual activity is detected, implementing closer surveillance of the vessel/s involved. Discarding of undersized golden redfish is considered highly unlikely because there are very few undersized fish in Icelandic waters since 2009 due to an absence of recruitment.

Further to this, evidence demonstrates the legal framework and monitoring in place:

### References

[IRFM Standard revision 2.1](#)  
[Redfish Reassessment report July 2019](#)

# D.1 EVIDENCE OF ALIGNMENT

## D1.14.01

Discarding of commercial species is prohibited by law in Iceland (Article 2 of the Act Concerning the Treatment of Commercial Marine Fish, No. 57/1996) and this includes golden redfish. This means that if vessels do not have sufficient quota to cover the species they have caught they are required to attain quota through the quota transfer system. Consequently, if vessels do not have sufficient catch quotas for their probable catches they must suspend all fishing activities. Discarding is subject to penalty<sup>193</sup> (400,000 to 8,000,000 ISK or about 3,000 to 60,000 EUR). As noted in previous clauses, catches are monitored and should the composition of the catch (species, size) or its quality differ from other vessels fishing in the vicinity, the Fisheries Directorate has powers to place the vessel under closer surveillance by placing an inspector on board for one day or fishing trip. The vessel must pay the Directorate's costs (e.g. inspector wages) if this occurs more than once in a fishing year (Article 13 of Act No. 57/1996).

Clause 2.3.2.11. In cases of mixed species catches, all commercial species shall be landed.

Evidence provided at p167 'Discarding of commercial species is prohibited by law and all commercial species must be landed. All commercial species are separated and declared by logbook and landed weight. This is monitored by Fisheries Directorate inspectors and penalties are in place for non-compliance'.

In addition to formal quota species, there are a suite of other commercial species which are landed. The Directorate's website has a public search function which lists 65 of these species<sup>201</sup>. Some of these are species for which there is a ban on direct fishing (e.g. Atlantic halibut, certain sharks, etc...) but that are landed as part of the discarding prohibition. Others do not have a formal National TAC but are landed and sold commercially. During the site visits, the Assessment Team witnessed one Atlantic halibut landed at the Reykjavik Fish Market.

# D.1 EVIDENCE OF ALIGNMENT

D1.14.02		
GSSI Component	Guidance	
The standard requires the incorporation of bycatch management planning into broader fisheries management plans, providing the fishery of which the unit of certification is part requires bycatch management action. This planning should include objectives, strategies, standards and measures directed at managing bycatch and reducing discards.	This Supplementary Component is looking for an integration of bycatch management planning within broader fisheries management plans.	
Conclusion	References	
<p>NB. The IRFM Standard defines bycatch as "Discarded catch plus incidental catch" (p 22) and requires in 1.1.10.7 in relation to the fisheries management plan that "The objectives and management measures relevant to ecosystem effects of the fishery", which includes bycatch and discards.</p> <p>The IRFM Standard is in alignment, as its management in relation to bycatch and discards are further covered through 3.2.5.1 "Management plans shall be developed and implemented in a timely fashion for avoiding, minimizing or mitigating any ecosystem issues properly identified. These shall be based on risk analysis and scientific advice, consistent with the precautionary approach, as being of serious concern in the fishery in question" (p. 21). 3.2.2.2 "Where relevant, appropriate steps shall be taken to avoid, minimize or mitigate encounters with seabirds and marine mammals"; 3.2.2.3 "Non-target catches, including discards, of stocks other than the "stock under consideration" should not threaten these non-target stocks with serious risk of extinction; if serious risks of extinction arise, effective remedial action should be taken".</p> <p>In relation to monitoring discards: 2.3.2.9 "Monitoring and control measures shall be in place and shall be conducted in a manner to encourage and demonstrate compliance (and deter unreported landings) (p. 18) 2.3.3.1 "All landed catches must be subtracted from that species relevant quotas (allowable catch) of the vessel or vessel group" and 2.3.3.2 to discourage discarding "Limited allowance may be made for the use of quota for one species to count against landings of another species, with the objective of providing the necessary minimum flexibility and discouraging discards" (p. 18).</p>	<p><a href="#"><u>IRFM Standard revision 2.1</u></a></p>	

# D.1 EVIDENCE OF ALIGNMENT

D1.14.03	
GSSI Component	Guidance
<p>The standard for the management system requires the existence of a current and regularly updated Fishery Management Plan (FMP), incorporating management objectives and management measures to achieve those objectives, for the stock under consideration and pertinent aspects of the ecosystem effects of fishing.</p>	<p>A Fishery Management Plan is required. This Supplementary Component relates to the process by which that plan is maintained.</p>
Conclusion	References
<p>The IRFM Standard is in alignment with this component, as a Fisheries Management Plan is required through 1.1.7 "Fishing for the "stock under consideration" shall be managed by the competent authorities in accordance with a documented and publicly available Fisheries Management Plan" (p. 10).</p> <p>In relation to the process by which the fisheries management plan is maintained, 1.4.1 states "For the stock under consideration the harvesting policy (including its consistency with the precautionary approach), stock assessments and advice shall be reviewed, by request from the fisheries management authorities at appropriate, regular intervals as well as when substantive changes are made in harvesting policy by and appropriate international scientific body or committee" (p. 14) and 1.4.2 "Following external scientific review, the competent fisheries management authority shall review and/or revise the harvesting policy, taking into consideration the external review, as appropriate" (p. 14).</p> <p>Fisheries Management Plans are available on government websites, as seen in reference list</p>	<ul style="list-style-type: none"> <li>• FAO Code of Conduct</li> <li>• <a href="#">FAO Code of Conduct, art. 7.3.3.</a></li> <li>▪ <a href="#">IRFM Standard revision 2.1</a></li> <li>• 3.1, 3.1.1, 3.1.2, 3.2.4, 3.2.4.1, 3.2.5.1</li> <li>• <a href="https://www.government.is/news/article/2018/05/15/Haddock/">https://www.government.is/news/article/2018/05/15/Haddock/</a></li> <li>• <a href="https://www.hafogvatn.is/en/about/news-announcements/mfris-advise-for-the-fishing-year-20242025-f">https://www.hafogvatn.is/en/about/news-announcements/mfris-advise-for-the-fishing-year-20242025-f</a></li> <li>• <a href="https://www.hafogvatn.is/en/harvesting-advice">https://www.hafogvatn.is/en/harvesting-advice</a></li> </ul>

# D.1 EVIDENCE OF ALIGNMENT

**D1.14.03**

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# D.1 EVIDENCE OF ALIGNMENT

D1.15	
GSSI Component	Guidance
<p>The Standard requires that the methodology and results of assessments of the current status and trends of the stock under consideration are made publicly available in a timely manner, respecting confidentiality where appropriate.</p>	<p>This Essential Component is included under the Element of Management Documentation, but is essentially about transparency. It is linked with Essential Component D.1.08 that addressed Participatory Management. To meet that Essential Component, the standard must require the fisheries management organization or arrangement to make information and advice used in its decision-making publicly available. The methodology and results of assessments of the current status and trends of the stock under consideration is part of the information and advice used in this decision-making. The publication of this information may be constrained by legitimate rules governing confidentiality .</p>
Conclusion	References
<p>The IRFM Standard is in alignment with this component, as the public availability and transparency of information are prescribed in the following clauses of the Standard:</p> <p>1.1.5 "Transparency in the fisheries management and related decision-making process shall be ensured" (p. 10);</p> <p>1.1.7 "Fishing for the "stock under consideration" shall be managed by the competent authorities in accordance with a documented and publicly available Fisheries Management Plan" (p. 10);</p> <p>1.2.1, "A competent research institute or arrangement shall collect and/or compile the necessary data and carry out scientific research and assessment of the state of fish stocks and the condition of the ecosystem. Research results shall be made public in a timely and readily understood fashion" (p. 12);</p> <p>2.3.3.5 "Information on each vessels catch quota and quota use shall be updated regularly and made public and accessible to all on the official web-site, thus ensuring transparency" (p 19).</p>	<ul style="list-style-type: none"> <li>• <a href="#"><u>IRFM Standard revision 2.1</u></a></li> <li>• <a href="#"><u>2nd Surveillance Assessment Report Icelandic Tusk Commercial Fishery</u></a></li> <li>• <a href="#"><u>Workshop on Stock Identification and Allocation of Catches of Herring to Stocks (WKSIDAC)</u></a></li> <li>• <a href="#"><u>ICES Advice on fishing opportunities, catch, and effort Arctic Ocean, Greenland Sea, Icelandic Waters, Norwegian Sea, and Oceanic</u></a></li> </ul>

# D . 1 E V I D E N C E O F A L I G N M E N T

## D1.15

The 2nd Surveillance Report for Icelandic Tusk Commercial Fishery references to publicly available ICES reports on stock assessment and management plans (links found in reference list )

[Northeast Atlantic ecoregions](#)  
[June 2024](#)



# D.1 EVIDENCE OF ALIGNMENT

D1.16	
GSSI Component	Guidance
<p>The Standard requires that the methodology and results of the analysis of the most probable adverse impacts of the unit of certification and any associated culture and enhancement activity on the ecosystem are made publicly available in a timely manner, respecting confidentiality where appropriate.</p>	<p>This Essential Component is included under the Element of Management Documentation, but is essentially about transparency. It is linked with Essential Component D.1.08 that addressed Participatory Management. To meet that Essential Component, the standard must require the fisheries management organization or arrangement to make information and advice used in its decision-making publicly available. The methodology and results of the analysis of the most probable adverse impacts of the unit of certification and any associated culture and enhancement activity on the ecosystem is part of the information and advice used in this decision-making. The publication of this information may be constrained by legitimate rules governing confidentiality.</p>
Conclusion	References
<p>The IRFM Standard is in alignment with this component, as there are two main provisions in the Standard that address this element:</p> <p>Clause 1.1.7 that requires "Fishing for the "stock under consideration" shall be managed by the competent authorities in accordance with a documented and publicly available Fisheries Management Plan" (p. 10) providing transparency; and clause 1.1.10.7 "The objectives and management measures relevant to ecosystem effects of the fishery" (p. 11) and addressing ecosystems impacts by the fishery.</p> <p>Both transparency on methodology and ecosystem impact substantiated by:</p> <p>1.1.5 "Transparency in the fisheries management and related decision-making process shall be ensured" (p. 10);</p>	<p><a href="#"><u>IRFM Standard revision 2.1</u></a></p>

# D.1 EVIDENCE OF ALIGNMENT

## D1.16

1.2.1 "A competent research institute or arrangement shall collect and/or compile the necessary data and carry out scientific research and assessment of the state of fish stocks and the condition of the ecosystem. Research results shall be made public in a timely and readily understood fashion" (p.12);

3.1.1 "Adverse Impacts of the fishery on the ecosystem shall be considered and appropriately assessed and effectively address, consistent the precautionary approach" (p. 20); and

3.2.1.1 "Information shall be available on fishing gear used in the fishery, including the fishing gears' selectivity and its potential impact on the ecosystem (...)". (p. 20)

In relation to culture enhancement activity, enhanced fisheries are not covered under the scope of the IRFM Standard (p. 4, footnote 2).

# D.1 EVIDENCE OF ALIGNMENT

D1.17	
GSSI Component	Guidance
<p>The standard requires that the efficacy of management measures and their possible interactions is kept under continuous review, taking into account the multipurpose nature of the use patterns in inland and marine waters.</p>	<p>The purpose of consultation and review regarding the efficacy of conservation and management measures and their possible interactions is to ensure that there is a well based expectation that management will be successful, taking into account uncertainty and imprecision. "Management measures" in this Requirement are the measures referred to in the other Essential Components in this Performance Area. They are regarded as being synonymous with the "conservation and management measures" referred to in CCRF Article 7.6.8.</p> <p>The expression "taking into account the multipurpose nature of the use patterns in inland and marine waters" refers to the uncertainty arising from other (non-fishery) impacts on the fishery. For example, if there are other users from other sectors, fishery management, although not being able to control those sectors, should take their impacts into account when devising the strategy for achieving management objectives. This is akin to taking into account all sources of mortality on the fish stock, from fishing and non-fishing sources. For example, if water is abstracted from rivers at certain times of the year and this has an adverse impact on the fish stock, management of the fishery should address that fact (perhaps by reducing fishing or having a closed season at this time), although not being able to influence when and to what extent the water is abstracted. In a coastal context, the fishery management should be integrated with coastal zone management to the extent necessary to account for non-fishing impacts.</p>
Conclusion	References
<p>The IRFM Standard is in alignment with this component, as continuous review of management measures, their efficacy and possible interactions is covered in the Standard under clause 1.4.1. It requires "For the stock under consideration the harvesting policy (including its consistency with the precautionary approach), stock assessments and advice shall be reviewed, by request from the fisheries management authorities at appropriate, regular intervals as well as when substantive changes are made in harvesting policy by an appropriate international scientific body or committee" (p. 14).</p>	<p><a href="#"><u>IRFM Standard revision 2.1 Icelandic Redfish full assessment July 2019</u></a></p>

# D.1 EVIDENCE OF ALIGNMENT

## D1.17

In addition, clause 1.4.2 further states that "Following external scientific review, the competent fisheries management authority shall review and/or revise the harvesting policy, taking into consideration the external review, as appropriate".

In relation to impact of management measures on the wider ecosystem , this is covered under clause 3.2.5.1 "Management plans shall be developed and implemented in a timely fashion for avoiding, minimizing or mitigating any ecosystem issues properly identified. These shall be based on risk analysis and scientific advice, consistent with the precautionary approach, as being of serious concern in the fishery in question".

**Examples of this application can be seen in the Icelandic Redfish full assessment July 2019:**

p.76 The MFRI is the main research institute in marine science in Iceland. Data collection for assessment purposes, both from the fishery and surveys, is performed by the MFRI in cooperation with the Fisheries Directorate. MFRI issues advice on individual stocks on the web annually. The report from the underlying stock assessment and the ICES advice are readily accessible on the ICES website.

From pages 76–85. A detailed description of the stock assessment model used for Icelandic redfish is provided. The golden redfish stock is assessed using the Gadget tool, which is a forward projecting, age and length disaggregated population model fitted to catch and survey data.

Clause 1.2.3 p86–88 provides evidence of the evaluation of Stock assessments shall be based on systematic research of the size and/or productivity of the fish stock(s).

# D.1 EVIDENCE OF ALIGNMENT

D1.17.01	
GSSI Component	Guidance
<p>The standard requires a regular assessment through periodic review of plans and management measures addressing bycatch, reduction of discards and reduction of post-released mortality to ensure that they continue to meet goals and objectives and for adjustment, as appropriate.</p>	<p>To meet this Supplemental Component, the standard must require review of all plans relating to bycatch management and discard reduction measures.</p>
Conclusion	References
<p>The IRFM Standard is in alignment with this component, as the periodic reviews of plans and management measures are covered by the Standard through 1.4.1 that requires "For the stock under consideration the harvesting policy (including its consistency with the precautionary approach), stock assessments and advice shall be reviewed, by request from the fisheries management authorities at appropriate, regular intervals as well as when substantive changes are made in harvesting policy by an appropriate international scientific body or committee" (p. 14).</p> <p>Bycatch is defined as "Discarded catch plus incidental catch" (p 22) and 3.2.2.1 requires that "Discarding, including discarding of catches from non target commercial stocks, is prohibited". MFRI estimates discards annually as a check to ensure compliance with the discard ban.</p> <p>Periodic review relation to bycatch and discards is therefore monitored by monitoring catches and meeting TACs:</p> <p>2.3.2.11 "In cases of mixed species catches, all commercial species shall be landed" (p. 18);</p> <p>2.3.3.1 "Landed catches shall be subtracted from the relevant quotas (allowable catch) of the vessel or vessel group" (p.18);</p> <p>2.3.3.5 "Information on each vessels catch quota and quota use shall be updated regularly and made public and accessible to all on the official web-site, thus ensuring transparency" (p. 19);</p> <p>2.3.5.1 "Analysis shall be carried out with the aim of detecting any deviations that may occur of the actual total catch from the Total Allowable Catch (TAC). Measures are available and are adopted when indicated" (p.19);</p>	<p><a href="#"><u>IRFM Standard revision 2.1</u></a></p> <p><a href="#"><u>Vessel Quota information</u></a></p>

# D.1 EVIDENCE OF ALIGNMENT

## D1.17.01

2.3.5.2 "Anyone purchasing and/or selling catches shall be obligated to present reports to the appropriate authorities, containing information on the purchase, sale and other disposition of fish catches. If analysis reveals discrepancy between the information stated in the reports and the information received from the harbor weighing, corrective measures shall be taken when this is deemed appropriate" (p. 19).

Realtime vessel quota information for Icelandic fishing vessels can be found here:

<https://island.is/v/gagnasidur-fiskistofu/gagnasidur?pageName=ReportSection4ce086cbd6149a60bd90&491ab5c400475b175b9b=%7B%22filters%22%3A%5B%5D%2C%22targets%22%3A%5B%7B%22table%22%3A%22Skipaskra%22%2C%22column%22%3A%22Skip%22%7D%5D%7D&nr=7>

# D.1 EVIDENCE OF ALIGNMENT

D1.17.02	
GSSI Component	Guidance
<p>The standard requires a review of the systems for the regular monitoring of the effectiveness of management measures for bycatch management and reduction of discards, assessed against the management objectives.</p>	<p>To meet this Supplementary Component, the standard must require review of the systems for the regular monitoring of the effectiveness of management measures for bycatch management and reduction of discards. This review must be relative to the management objectives for bycatch management and reduction of discards.</p>
Conclusion	References
<p>The IRFM Standard is in alignment with this component, as . vessel catches are monitored by the MRFI through e.g. fishery observers. The IRFM Standard requires through 2.3.5.1 and 2.3.5.2 (p. 19) that "Analysis shall be carried out with the aim of detecting any deviations that may occur of the actual total catch from the Total Allowable Catch (TAC). Measures are available and are adopted when indicated"; and "Anyone purchasing and/or selling catches shall be obligated to present reports to the appropriate authorities, containing information on the purchase, sale and other disposition of fish catches. If analysis reveals discrepancy between the information stated in the reports and the information received from the harbor weighing, corrective measures shall be taken when this is deemed appropriate" (p. 19).</p> <p>This can be found in Clause 2.3.5.1 "Analysis shall be carried out with the aim of detecting any deviations that may occur of the actual total catch</p>	<ul style="list-style-type: none"> <li>▪ <a href="#"><u>IRFM Standard revision 2.1</u></a></li> <li>▪ Clause 2.3.5.1</li> <li>▪ Clause 2.3.5.2</li> </ul>

# D . 1 E V I D E N C E O F A L I G N M E N T

## D1.17.02

from the Total Allowable Catch (TAC). Measures are available and are adopted when indicated.

2.3.5.2 Anyone purchasing and/or selling catches shall be obligated to present reports to the appropriate authorities, containing information on the purchase, sale and other disposition of fish catches. If analysis reveals discrepancy between the information stated in the reports and the information received from the harbour weighing, corrective measures shall be taken when this is deemed appropriate.



## D.2 EVIDENCE OF ALIGNMENT

D2.01	
GSSI Component	Guidance
<p>The standard requires the existence of management objectives that are applicable to the unit of certification and the stock under consideration and seek outcomes consistent with the long term sustainable use of the fisheries resources under management.</p>	<p>The Standard must show evidence of requiring the existence of clearly stated management objectives that meet the description in the Glossary. The appropriateness of those objectives is tested through the assessment of conformance with Essential Components in other Performance Areas, including, the actions (management measures, monitoring etc.) taken to meet them and the outcomes for the stock under consideration and the ecosystem.</p> <p>The "fishery" referred to in Paragraph 28 of the Guidelines encompasses both the unit of certification and the stock under consideration (as per paragraph 28.1), as do the management objectives referred to in this Essential Component.</p>
Conclusion	References
<p>The IRFM Standard is in alignment with this component, as seen through its definition of a Fisheries Management Plan (FMP). The definition is: "A fisheries management plan is an administrative instrument for long-term strategic management of fishery resources. The fisheries management plan identifies the partners in the fishery and their respective roles, the objectives for the fishery and specifies the management rules" (p. 9).</p> <p>The requirement of existence of management objectives applicable to the unit of certification are further substantiated in the sub clauses of 1.1.9 'the Fisheries Management Plan shall specify' (p. 11):</p> <p>1.1.9.1 "The long term objective(s) of the fisheries management, including target(s) for stock biomass and target value(s) or range(s) for fishing mortality or its proxy";</p>	<p><a href="#"><u>IRFM Standard revision 2.1</u></a></p>

## D . 2 E V I D E N C E O F A L I G N M E N T

### D2.01

1.1.9.2 "Limits with respect to precautionary management, including the limit reference point for stock size or its proxy and the limit reference point for fishing mortality or its proxy (e.g. harvest as a proportion of stock size, etc.), as well as remedial action to be taken if limits are approached or exceeded"; 1.1.9.3 "The Specification of the applicable harvest control framework or harvest control rule, as appropriate" and 1.1.9.4 "The primary approach applied to managing the fisheries (e.g. input controls, output controls, etc.)".

# D.2 EVIDENCE OF ALIGNMENT

D2.02	
GSSI Component	Guidance
<p>The standard requires that the management objectives clearly define target and limit reference points, or proxies for the stock under consideration on the basis of the best scientific evidence available and in accordance with the Precautionary Approach. Target reference points must be consistent with achieving Maximum Sustainable Yield, MSY (or a suitable proxy) on average and limit reference points (or proxies) must be consistent with avoiding recruitment overfishing or other impacts that are likely to be irreversible or very slowly reversible.</p>	<p>The Glossary provides descriptions of target and limit reference points. Reference points must be set at levels consistent with achieving maximum sustainable yield (MSY) (or a suitable proxy) on average, or a lesser fishing mortality if that is optimal in the circumstances of the fishery (e.g. multispecies fisheries) or to avoid severe adverse impacts on dependent predators. To be effective, reference points must be incorporated within a framework of decision rules (See D.5.02) to ensure that the stock does not fall below a limit, Blim, at which recruitment could be significantly impaired, or lead to average recruitment that is significantly lower than it would be with a higher stock biomass. The level of Blim should be set on the basis of historical information, applying an appropriate level of precaution according to the reliability of that information. In addition, an upper limit should be set on fishing mortality, Flim, which is the fishing mortality rate that, if sustained, would drive biomass down to the Blim level.</p> <p>A proxy is a surrogate or substitute approach that results in acceptable outcomes consistent with the primary approach. In the context of reference points, when data are insufficient to estimate reference points directly other measures of productive capacity can serve as reasonable substitutes or “proxies”. Suitable proxies may be, for example, standardized cpue as a proxy for biomass or specific levels of fishing mortality and biomass which have proven useful in other fisheries and can be used with a reasonable degree of confidence in the absence of better defined levels. It is important to note that the use of a proxy may involve additional uncertainty, and if so, should trigger the use of extra precaution in the setting of biological reference points. The words “or proxies” are a consideration for small scale and/or data limited fisheries, This should not be interpreted to mean that small scale and/or data limited fisheries do not require target and limit reference points, but that the methods used to develop them and monitor the stock status in relation to them may be less data intensive than for large scale fisheries. See also Essential Components D.1.09 and D.3.07.</p>
Conclusion	References

## D . 2 E V I D E N C E O F A L I G N M E N T

### D2.02

The IRFM Standard is in alignment with this component, as the Limit Reference Point is referred to in clause 1.3.2.1.1 (p. 13) of the Standard where it states that: "The management target for fishing mortality (or its proxy) and the associated limit reference point, as well as the management action to be taken when the limit reference point is exceeded, shall be stated in the Fisheries Management Plan", stipulating under footnote 11 "Flim can be explicit, or implicit in cases where harvest rate is set annually to a precautionary Ftarget (or its proxy)".

This is further specified under:

1.3.2.2.1 "The long term management target for stock size (biomass), either explicit or implicit depending on management approach, consistent with the objective of promoting optimum utilization, shall be specified" (p. 13); and  
1.3.2.2.2 "Limits or directions for stock size (or its proxy) with respect to precautionary management, consistent with recruitment overfishing, shall be specified" (p. 14).

In Iceland, the limit reference is taken as the MSY and examples of this can be found under 'Assessment performance' and 'Reference points and Harvest rules' in the 2nd Surveillance Assessment Reports for golden redfish (p.26-27), cod (p. 27-28), haddock (p. 24,27), saithe (p. 23-30), and tusk (p. 24-27).

*IRFM Standard*  
*revision 2.1*

# D . 2 E V I D E N C E O F A L I G N M E N T

D2.03	
GSSI Component	Guidance
<p>The standard requires, in the case of enhanced fisheries, the existence of management objectives consistent with avoiding significant negative impacts of enhancement activities on the natural reproductive stock component of the stock under consideration and any other wild stocks from which the organisms for stocking are being removed..</p>	<p>All Essential Components that address Enhanced Fisheries can be "not applicable" to schemes that do not cover these fisheries. However, it is incumbent on the scheme to explicitly exclude enhanced fisheries (rather than explicitly include them) in order for these requirements to be not applicable. If the scheme remains silent on the issue of enhanced fisheries, then the standard could potentially be applied to fisheries that include enhanced components, but if these are not properly dealt with by the standard (i.e. as per GSSI Essential Components) then the scheme would be deficient when being used to certify such fisheries. In essence, the default position is that a scheme/standard can be applied to enhanced fisheries unless it excludes them explicitly.</p> <p>The term "significant negative impacts" is used in the FAO Inland Guidelines. This was not intended to be equivalent to "severe adverse impacts" (on dependent predators). The FAO consultation that resulted in the drafting of the Inland Guidelines considered that avoidance of "severe adverse impacts" only would not be consistent with a management obligation to manage enhancement in ways that would not impact the productivity and abundance of the natural reproductive stock component of the stock under consideration.</p> <p>Any displacement of the naturally reproductive stock components of enhanced stocks must not reduce the natural reproductive stock components below abundance-based Target Reference Points or their proxies. Note that the Target Reference Points are for the natural reproductive stock component. For example, in the case of salmon fisheries, if the spawning stock is comprised of fish both from enhanced and natural origins, the escapement goal considers only the natural origin component. An example Target Reference Point would be an escapement target based on the natural reproductive stock component.</p>
Conclusion	References
<p>This component is not applicable, as enhanced fisheries are not covered</p>	<p><a href="#"><u>IRFM Standard revision 2.1</u></a></p>

## D . 2 E V I D E N C E O F A L I G N M E N T

### D2.03

under the scope of the IRFM Standard (p. 4, footnote 2).

## D . 2 E V I D E N C E O F A L I G N M E N T

D2.04	
GSSI Component	Guidance
<p>The standard requires management objectives that seek to ensure that catches and discards by the unit of certification of stocks other than the stock under consideration and any associated culture and enhancement activity do not threaten those stocks with recruitment overfishing or other impacts that are likely to be irreversible or very slowly reversible.</p>	<p>This Essential Component covers "non-certified catches" which is everything other than the stock under consideration.</p> <p>This Essential Component is explicitly and deliberately confined to the effects of non-certified catches and discards by the unit of certification on those non-certified species/stocks. Cumulative effects on non-certified species/stocks are not included in the Ecolabelling Guidelines. They are not part of the Essential Components, but they are covered in the Supplemental Components. The part of the component relating to enhancement activity may be "not applicable" to schemes that explicitly do not cover enhanced fisheries.</p> <p>Examples of irreversible or very slowly reversible effects on bycatch species include excessive depletion of very long-lived organisms (see Glossary). To mitigate effects that are likely to be irreversible or very slowly reversible requires those effects to be made less severe such that they are no longer likely to be irreversible or very slowly reversible.</p>
Conclusion	References
<p>The IRFM Standard is in alignment with this component, as it states in clauses 3.2.2.1 "Discarding, including discarding of catches from non-target commercial stocks, is prohibited; and 3.2.2.3 "Non-target catches, including discards, of stocks other than the "stock under consideration" should not threaten these non-target stocks with serious risk of extinction; if serious risks of extinction arise, effective remedial action should be taken".</p> <p>Regarding enhancement activities, enhanced fisheries are not covered under the scope of the IRFM Standard (p. 4, footnote 2).</p>	<ul style="list-style-type: none"> <li>• <a href="#"><i>IRFM Standard revision 2.1</i></a></li> <li>• <a href="#"><i>Saithe 2<sup>nd</sup> surveillance assessment report dec 2021</i></a></li> </ul>

## D . 2 E V I D E N C E O F A L I G N M E N T

### D2.04

Implementation of the requirement is evident in the 2nd Surveillance Assessment report for saithe in Table 10 in section 7.5 Bycatch, habitat, and ecosystem update > Associated species catch and bycatch to the fishery, page 43 to 53.



## D . 2 E V I D E N C E O F A L I G N M E N T

D2.04.01	
GSSI Component	Guidance
The standard requires the existence of management objectives for the use and management of that portion of the full catch of which bycatch and discards are subsets, and that such plans are consistent with the CCRF.	Management objectives required by the standard should include, inter alia, reduction of post-harvest losses and waste, and encouragement for those involved in fish processing, distribution and marketing to improve the use of by-catch, to the extent that this is consistent with responsible fisheries management practices. The over-riding aim should be to minimize waste including, where appropriate, loss of productivity to the marine ecosystem.
Conclusion	References
<p>The IRFM Standard is in alignment as it requires with 1.1.10.7 in relation to the fisheries management plans shall consider "The objective and management measures relevant to ecosystem effects of the fishery" (p. 12).</p> <p>The use of discards is covered by the fact that the IRFM Standards prohibits discarding (2.3.2.7, p. 17, 2.3.2.11 p. 18, and 3.2.2.1 p. 20) and all catches are landed. The Standard discourages the practice of discards through measures like a transferable quota system (2.3.3.2, p. 18), aims to minimize loss of productivity through setting management objectives aimed to achieve optimum utilization (1.3.2.2.1, p. 13).</p>	<p><a href="#"><u>IRFM Standard revision 2.1</u></a></p>

# D . 2 E V I D E N C E O F A L I G N M E N T

D2.04.02	
GSSI Component	Guidance
<p>The standard requires the existence of management objectives, including reference points, that seek to ensure non-certified catches (i.e. stocks/species in the catch that are other than the stock under consideration) are not threatened with recruitment overfishing or other impacts that are likely to be irreversible or very slowly reversible.</p>	<p>This Supplementary Component requires that management objectives for non-certified catches (i.e. stocks/species in the catch that are other than the stock under consideration) that consider their overall status, similar to the objectives for the stock under consideration. This takes into account the impacts of all fishing on those stocks that might give rise to recruitment overfishing or other impacts that are likely to be irreversible or very slowly reversible . This Supplementary Component has a cumulative element similar to that for stock(s) under consideration in Essential Component D.2.03. To meet this Supplementary Component the standard would require the specification of reference points for non-certified stocks.</p>
Conclusion	References
<p>The IRFM Standard is in alignment with this component, as it requires management objectives to ensure non-certified catches are not threatened with recruitment overfishing or other impacts that are irreversible or very slowly reversible through the following clauses:</p> <p>3.2.1.1 "Information shall be available on fishing gear used in the fishery, including the fishing gears' selectivity and its potential impact on the ecosystem. Stocks of non-target species commonly caught in the fisheries for the stock under consideration may be monitored and their state assessed as appropriate"; and</p> <p>3.2.2.3 "Non-target catches, including discards, of stocks other than the "stock under consideration" should not threaten these non-target stocks with serious risk of extinction; if serious risks of extinction arise, effective remedial action should be taken".</p>	<ul style="list-style-type: none"> <li>• <a href="#"><u>IRFM Standard revision 2.1</u></a></li> <li>• <a href="#"><u>Second Surveillance Assessment Icelandic Ling Commercial Fishery</u></a></li> <li>• Examples: Pages 17-18, Table 11 on pages 41 to 50, Pages 73 - 75</li> </ul>

## D . 2 E V I D E N C E O F A L I G N M E N T

### D2.04.02

Furthermore, under clause 3.2.2.1 discarding of non-target commercial stocks is prohibited (p. 20). Vessels need to have a quota place for each commercial stock they are expected to catch as part of their fishing license. Icelandic Fisheries are multispecies in nature and the most commercially fished species in Iceland are part of the ITQ system. Clause 2.3.3.2 stipulates that "Limited allowance may be made for the use of quota for one species to count against landings of another species, with the objective of providing the necessary minimum flexibility and discouraging discards" (p. 18) and clause 2.3.3.3 requires that "When a vessel's quota is used up, additional quota must be transferred to the vessel from other vessels or the vessel stops fishing (p. 19)"

The TAC and ITQ system is explained in the certification assessment reports, for example Second Surveillance Assessment Icelandic Ling Commercial Fishery on page 17-18, Table 11 on pages 41 to 50, and pages 73 - 75 etc.

# D . 2 E V I D E N C E O F A L I G N M E N T

D2.05	
GSSI Component	Guidance
<p>The standard requires the existence of management objectives that seek to ensure that endangered species are protected from adverse impacts resulting from interactions with the unit of certification and any associated culture or enhancement activity, including recruitment overfishing or other impacts that are likely to be irreversible or very slowly reversible.</p>	<p>The context of this Essential Component is Endangered Species. Endangered species are defined in the Glossary. These species are already adversely impacted at the population level, by definition, and are susceptible to further adverse impacts at this level from which they need to be protected. Where "adverse impacts" is used in the FAO Guidelines ("adverse impacts of the fishery on the ecosystem") there is no further qualification provided (i.e. no "significant" or "severe"). Elsewhere in the Guidelines, the term "adverse impacts" is qualified, but in each case this is in a very specific context. For example, the term "significant negative impacts" is used in the FAO Ecolabelling Guidelines only in relation to enhanced fisheries and "severe adverse impacts" is used only in relation to dependent predators. The term "significant adverse impacts" occurs only in the Deep Sea Guidelines with respect to VMEs.</p> <p>The FAO Guidelines acknowledge that much greater scientific uncertainty is to be expected in assessing possible adverse ecosystem impacts of fisheries than in assessing the state of target stocks (paragraph 31 (41)), hence the management objectives to protect endangered species should take into account risk and uncertainty.</p>
Conclusion	References
<p>The IRFM Standard is in alignment with this component, as it requires that management objectives ensure protection of endangered species from adverse impacts as a result from interactions with the unit of certification through the following clauses:</p> <p>3.1.1 "Adverse impacts of the fishery on the ecosystem shall be considered and appropriately assessed and effectively addressed, consistent with the precautionary approach";</p> <p>3.1.2, "Those impacts that are likely to have serious consequences shall be addressed. This may take the form of an immediate management response or further analysis of the identified risk";</p>	<ul style="list-style-type: none"> <li>• <a href="#"><u>2nd Surveillance Assessment Report Icelandic Summer Spawning Herring (2021)</u></a></li> <li>• Section Endangered, Threatened and Protected (ETP) and vulnerable species interactions on pages 40 -45.</li> </ul>

## D . 2 E V I D E N C E O F A L I G N M E N T

### D2.05

3.2.1.2, "Information shall be available on the potential effect of fishing on endangered, threatened and protected species, as appropriate and relevant in the context of the unit of certification";

3.2.2.4, "Suitable steps shall be considered to avoid, minimize or mitigate encounters with endangered, threatened and protected species, as appropriate and relevant in the context of the unit of certification";

3.2.2.3 "Non-target catches, including discards, of stocks other than the "stock under consideration" should not threaten these non-target stocks with serious risk of extinction; if serious risks of extinction arise, effective remedial action should be taken".

Regarding enhancement activities, enhanced fisheries are not covered under the scope of the IRFM Standard (p. 4, footnote 2).

An example of implementation can be found in 2nd Surveillance Assessment Report Icelandic Summer Spawning Herring (2021) in section Endangered, Threatened and Protected (ETP) and vulnerable species interactions on pages 40 -45.

# D . 2 E V I D E N C E O F A L I G N M E N T

D2.05.01		
GSSI Component	Guidance	
The standard requires the existence of management objectives that seek to reduce interactions with particularly vulnerable bycatch (e.g. juveniles and rare, endangered, threatened or protected species).	Under this Supplemental Component the standard must require objectives for the reduction of interactions with a range of particularly vulnerable bycatch, including juveniles and rare, endangered, threatened or protected species. This is in addition to objectives to ensure that endangered species are protected from adverse impacts as in the parent Essential Component. Endangered and threatened are described in the Glossary. "Protected" refers generally to any plant or animal that a government declares by law to warrant protection; most protected species are considered either threatened or endangered; also a species that is recognized by national legislation, affording it legal protection due to its population decline in the wild. The decline could be as a result of human or other causes.	
Conclusion	References	
<p>The IRFM Standard is in alignment with this component, as the existence of management objectives that seek to reduce interactions with particularly vulnerable bycatch are covered by the Standard in several clauses.</p> <p>Broadly through:</p> <p>1.1.10.7 that stipulates that the Fishery Management plan shall consider "The objectives and management measures relevant to ecosystem effects of the fishery" (p. 12)</p> <p>3.1.1 "Adverse impacts of the fishery on the ecosystem shall be considered and appropriately assessed and effectively addressed, consistent with the precautionary approach" (p. 20);</p> <p>3.1.2 "Those impacts that are likely to have serious consequences shall be addressed (...)" (p. 20);</p>	<ul style="list-style-type: none"> <li>• <a href="#"><u>2nd Surveillance Assessment Report Icelandic Ling Commercial Fisheries</u></a></li> <li>• Endangered, Threatened and Protected (ETP) and vulnerable species interactions – Pages 50 – 54</li> <li>• Fishing area closure due to high juvenile abundance and gear type. Page 36-37 and page 68.</li> </ul>	

## D . 2 E V I D E N C E O F A L I G N M E N T

### D2.05.01

3.2.2.3 "Non-target catches, inc. discards, of stocks other than the stock under consideration should not threaten these non-target stocks with serious risk of extinction; if serious risks of extinction arise, effective remedial action should be taken" (p. 20);

More specific requirements in relation to juveniles interactions:

1.3.2.3.2 "Consideration shall be given to measures designed to avoid excessive exploitation of spawning components at spawning time, as appropriate, especially at times when biomass (SSB) may approach the level of the limit reference point (Blim)" (p. 14);

1.3.2.3.3 "Consideration shall be given to relevant measures designed to limit fishing mortality of juvenile fish, with the objective to protect juveniles, to reduce the likelihood of growth overfishing and increasing the contribution of year classes to the spawning stock of the stock under consideration" (p. 14); and

3.2.3.1 "If studies show that the spawning or nursery areas or other essential habitats in the fishing area are at risk and highly vulnerable to negative impacts of particular fishing gear, such impacts shall be limited in range relative to the full spatial range of the habitat or else action is taken to avoid, minimize or mitigate such impacts" (p. 21)

In relation to rare, endangered, threatened and protected species interactions:

3.2.2.2 "Where relevant, appropriate steps shall be taken to avoid, minimize or mitigate encounters with seabirds and marine mammals" (p. 20);

3.2.2.4 Suitable steps shall be considered to avoid, minimize or mitigate encounters with endangered, threatened and protected species, as appropriate and relevant in the context of the unit of certification" (p. 21);

3.2.3.2 "Management measures must take into account significant continuous stony coral areas, identified through scientific and formal methods" (p.21);

## D . 2 E V I D E N C E O F A L I G N M E N T

### D2.05.01

3.2.3.3 "Such areas shall be documented and protected through their closure to fishing, where appropriate, with gear that has significant bottom impact (established through 3.2.4.2)" (p. 21);

3.2.3.4. "Known thermal vents structures shall be protected through area closure to fishing activities with gear that has significant bottom impact during normal operation" (p. 21).

In the 2nd Surveillance Assessment Report Icelandic Ling Commercial Fisheries, pages 50 - 54 discusses Endangered, Threatened and Protected (ETP) and vulnerable species interactions. And page 36-37 and page 68 e.g. describe short term closure due to high juvenile abundance and gear type closures.



## D.2 EVIDENCE OF ALIGNMENT

D2.06	
GSSI Component	Guidance
The standard requires the existence of management objectives seeking to avoid, minimize or mitigate impacts of the unit of certification on essential habitats for the stock under consideration and on habitats that are highly vulnerable to damage by the fishing gear of the unit of certification.	Essential habitats are described in the Glossary. The CCRF (Article 6.8) refers to "critical fisheries habitats in marine and fresh water ecosystems" which can be regarded as substantively the same as essential habitats for the purposes of the practical application of this Essential Component. Critical fisheries habitats in marine and fresh water ecosystems include wetlands, mangroves, reefs, lagoons, nursery and spawning areas. Examples of impacts on habitat that should be avoided include those listed in the CCRF: destruction, degradation, pollution and other significant impacts. In accordance with Paragraph 28.2 of the Ecolabelling Guidelines, in assessing fishery impacts, the full spatial range of the relevant habitat should be considered, not just that part of the spatial range that is potentially affected by fishing. The purpose of this is to consider both the degree to which the habitat is rare, or common, and also that there may be impacts on the same habitat in other parts of its spatial range.
Conclusion	References
<p>The IRFM Standard is in alignment with this component, as Clause 3.2.3.1 of the Standard (p. 21) states "If studies show that the spawning or nursery areas or other essential habitats in the fishing area are at risk and highly vulnerable to negative impacts of particular fishing gear, such impacts shall be limited in range relative to the full spatial range of the habitat or else action is taken to avoid, minimise or mitigate such impacts".</p> <p>This is exemplified in the 2nd Surveillance Assessment Report for Icelandic Golden Redfish Commercial Fishery (2021) Section '7.5.1.1 Habitat' on pages 56 – 62.</p>	<ul style="list-style-type: none"> <li>• 2nd Surveillance Assessment Report Icelandic Golden Redfish Commercial Fishery (2021)</li> <li>• Section 7.5.1.1 – Habitat page 56–61</li> <li>• <a href="#"><u>Form 9h IRFM Golden redfish 2nd Surveillance Report</u></a></li> </ul>

D2.07	
GSSI Component	Guidance

# D . 2 E V I D E N C E O F A L I G N M E N T

## D2.07

The standard requires the existence of management objectives that seek to avoid severe adverse impacts on dependent predators resulting from fishing on a stock under consideration that is a key prey species.

This Essential Component is about objectives for fishing mortality on stocks under consideration that are key prey species, not about fishing mortality on Dependent Predators themselves. Where the stock under consideration is a key prey species, the standard must require that fishing mortality on that species/stock is managed so as not to result in severe adverse impacts on Dependent Predators. The FAO Guidelines require that all sources of fishing mortality on the stock under consideration are taken into account (whether or not it is a prey species) in assessing the state of the stock under consideration, including discards, unobserved mortality, incidental mortality, unreported catches and catches in other fisheries. Management measures to meet these objectives are required under D.5.08. Severe adverse impacts are mentioned in the Essential Components only in relation to dependent predators. This is in line with the Ecolabelling Guidelines. The severity of adverse impacts is related to their potential reversibility. Severe adverse impacts can be regarded as those that are likely to be irreversible or very slowly reversible, which is described in the Glossary.

### Conclusion

The IRFM Standard is in alignment with this component, as requirements related to existence of management objectives to avoid severe adverse impacts on dependent predators when the stock under consideration is a key prey species is addressed in the Standard under clause 1.1.10.7, that prescribes that the Fisheries Management Plan shall consider "The objectives and management measure relevant to ecosystem effects of the fishery" (p. 12).

This is further defined in the following clauses (both p. 21):

3.2.4.1 "Considerations should be given to the food web that is if the stock under consideration is a key prey species in the ecosystem, the harvesting policy and management measures shall be directed to avoid severe adverse impacts on dependent predators";

3.2.5.1 "Management plans shall be developed and implemented in a timely fashion for avoiding, minimizing or mitigating any ecosystem issues properly identified, based on risk analysis and scientific advice, consistent with the precautionary approach, as being of serious concern in the fishery in question".

### References

[2nd Surveillance Assessment Report Icelandic Summer Spawning Herring \(2021\)](#)

- Section 'Foodweb considerations', page 45.

## D . 2 E V I D E N C E O F A L I G N M E N T

### D2.07

The Icelandic Summer Spawning Herring is considered a key prey species, and the management objectives that cover the IRFM requirement and demonstrates alignment with the GSSI component can be found in the 2nd Surveillance Assessment Report Icelandic Summer Spawning Herring Commercial Fishery (2021), Section 'Foodweb considerations', page 45.

# D . 2 E V I D E N C E O F A L I G N M E N T

D2.08	
GSSI Component	Guidance
<p>The standard requires the existence of management objectives that seek to minimize adverse impacts of the unit of certification, including any associated enhancement activities if applicable, on the structure, processes and function of aquatic ecosystems that are likely to be irreversible or very slowly reversible.</p>	<p>This Essential Component covers adverse impacts on the structure, processes and function of aquatic ecosystems. Ecosystem structure, processes and function are described in the Glossary. The Guidelines do not extend consideration of these impacts to all fisheries operating in the ecosystem where the unit of certification is operating and therefore this is not included in this Essential Component. This language is in accordance with Section 4.1.4.1 of the FAO Ecosystem Approach to Fisheries, which suggests one of the broad management objectives for a fisheries could be to keep impact on the structure, processes and functions of the ecosystem at an acceptable level.</p> <p>An earlier version of the requirements included an Essential Component on the conservation of biodiversity. Conservation of biodiversity is not mentioned separately in the Guidelines, but it is included in the CCRF Article 7.2.2 (d), which requires that States and sub-regional or regional fisheries management organizations and arrangements should adopt appropriate measures, based on the best scientific evidence available to provide that inter alia biodiversity of aquatic habitats and ecosystems is conserved. The structure, processes and function of aquatic ecosystems includes biodiversity, hence this is considered to be included in this Essential Component.</p> <p>Examples of irreversible or very slowly reversible indirect effects on the ecosystem include genetic modification and changed ecological role.</p>
Conclusion	References
<p>The IRFM Standard is in alignment with this component, as the minimization of adverse impacts of the unit of certification on the structure, processes and function of aquatic ecosystems that are irreversible or very slowly reversible as part of management objectives is required by the Standard through several clauses.</p> <p>This is broadly covered under clause 1.1.10.7 and clause 3.2.5.1 that 1) requires a Fishery Management Plan (FMP) "includes the objectives and management measures relevant to ecosystem effects of the fishery" (p. 12) and 2) that</p>	<ul style="list-style-type: none"> <li>• <a href="#"><i>IRFM Standard revision 2.1</i></a></li> </ul>

## D . 2 E V I D E N C E O F A L I G N M E N T

### D2.08

the plans " (...) shall be developed and implemented in a timely fashion for avoiding, minimizing or mitigating any ecosystem issues properly identified, based on risk analysis and scientific advice, consistent with the precautionary approach, as being of serious concern in the fishery in question" (p. 21) .

More specific requirements in relation to minimizing impact are the following:

3.1.1 "Adverse impacts of the fishery on the ecosystem shall be considered and appropriately assessed and effectively addressed";

3.1.2 "Those impacts that are likely to have serious consequences shall be addressed. This may take the form of an immediate management response or further analysis of the identified risk";

3.2.3.1 "If studies show that the spawning or nursery areas or other essential habitats in the fishing area are at risk and highly vulnerable to negative impacts of particular fishing gear, such impacts shall be limited in range relative to the full spatial range of the habitat or else action is taken to avoid, minimize or mitigate such impacts";

3.2.3.2 "Management measures must take into account significant continuous stony coral areas, identified through scientific and formal methods";

3.2.3.3 "Such areas shall be documented and protected through their closure to fishing, where appropriate, with gear that has significant bottom impact";

3.2.3.4 "Known thermal vents structures shall be protected through area closure to fishing activities with gear that has significant bottom impact during normal operation".

Regarding enhancement activities, enhanced fisheries are not covered under the scope of the IRFM Standard (p. 4, footnote 2).

# D . 2 E V I D E N C E O F A L I G N M E N T

D2.08.02		
GSSI Component	Guidance	
The standard requires that the ecosystem issues associated with the fishery of which the unit of certification is part are prioritized through a risk assessment and that operational objectives, indicators and reference points are set for all those issues that are assessed as being most important and feasible to address.	<p>To meet this Supplementary Component, the Standard requires operational objectives, indicators and reference points to be developed from broad management objectives for the ecosystem issues that are most important and feasible to address. Prioritizing the ecosystem issues should involve three basic steps:</p> <ul style="list-style-type: none"> <li>• identify issues, at a practical level, relevant to the fishery under each of the broad objectives;</li> <li>• prioritize the issues based on the risk they pose; and</li> <li>• develop operational objectives for priority issues, and as necessary, a process for monitoring some lower priority issues.</li> </ul>	
Conclusion	References	
<p>The IRFM Standard is in alignment with this component, as the ecosystem issues associated with the fishery of which the unit of certification is part are prioritized by the Standard through the following clauses:</p> <p>3.1.1 "Adverse impacts of the fishery on the ecosystem shall be considered and appropriately assessed and effectively addressed, consistent with the precautionary approach" (p. 20);</p> <p>3.1.2 "Those impacts that are likely to have serious consequences shall be addressed. This may take the form of an immediate management response or further analysis of the identified risk" (p. 20);</p> <p>3.2.4.1 "Food web considerations – If the stock under consideration is a key prey species in the ecosystem, the harvesting policy and management measures shall be directed to avoid severe adverse impacts on dependent predators";</p> <p>3.2.5.1 "Management plans shall be developed and implemented in a timely fashion for avoiding, minimizing or mitigating any ecosystem issues properly identified, based on risk analysis and scientific advice, consistent with the precautionary approach, as being of serious concern in the fishery in question" (p. 21).</p>	<p><a href="#"><u>IRFM Standard revision 2.1</u></a></p>	

# D . 2 E V I D E N C E O F A L I G N M E N T

D2.08.03		
GSSI Component	Guidance	
<p>The standard recognizes that scientific uncertainty coupled with natural variability may make it difficult to set realistic reference points for some ecosystem properties. In such cases, indicators and associated reference points should be based on parameters that can be measured or estimated with acceptable certainty; and that the property is known to be modified or could be modified by the fishery and therefore that it can be influenced by controls on the fishery. If it is not appropriate to set a target reference point, then at least a limit reference point should be set.</p>	<p>This Supplementary Component is linked to D.2.08.02. The recognition that scientific uncertainty coupled with natural variability may make it difficult to set realistic reference points for some ecosystem properties is part of the prioritization described for that Supplementary Component. This Supplementary Component requires the standard to focus on parameters that can be measured or estimated with acceptable certainty and properties of the ecosystem that are known to be modified or could be modified by the fishery. Limit reference points must be required at a minimum.</p>	
Conclusion	References	
<p>The IRFM Standard is in alignment, as it covers and acknowledges scientific uncertainty and natural variability through the following clauses:</p> <p>3.1.1 "Adverse impacts of the fishery on the ecosystem shall be considered and appropriately assessed and effectively addressed, consistent with the precautionary approach" (p. 20), with accompanying footnote 21 that refers to: "In this context refer to 2009 FAO Guidelines for Ecolabelling of Fish and Fishery Products from Marine Capture Fisheries, Article 31: Adverse impacts of the fishery on the ecosystem should be appropriately addressed. Much greater scientific uncertainty is to be expected in assessing possible adverse ecosystem impacts of fisheries than in assessing the state of target stocks. This issue can be addressed by taking a "risk assessment/risk management approach". For the purpose of development of ecolabelling schemes, the most probable adverse impacts should be considered, taking into account available scientific information, and traditional, fisher or community knowledge provided that its validity can be objectively verified. Those impacts that are likely to have serious consequences should be addressed. (...)"</p>	<p><a href="#"><u>IRFM Standard revision 2.1</u></a></p>	

## D . 2 E V I D E N C E O F A L I G N M E N T

### D2.08.03

Linked to this footnote is clause 1.3.1.3 "Relevant uncertainties shall be taken into account through a suitable method of risk assessment" (p. 13); and

1.3.2.3. "Information on the biology, life-cycle and structure of the stock shall be taken into account when designing management measures to promote optimal utilization of the stock with respect to resilience to natural variability and fishing" (p. 14)

Furthermore, in relation to uncertain data, this is covered under section 1.5 'Advice and Decision on TAC', specifically clause 1.5.10 "In the absence of specific information on the stock under consideration, generic evidence based on similar stocks may be used for fisheries with low risk to that stock under consideration. However, the greater the risk the more specific evidence is necessary to ascertain the sustainability of intensive fisheries" (p. 15)

In relation to setting target/limit reference points, this is established through clause 1.3.2.1.1. "The management target for fishing mortality (or its proxy) and the associated limit reference point, as well as the management action to be taken when the limit reference point is exceeded, shall be stated in the Fisheries Management Plan" (p. 13); and

1.3.2.2.2 "Limits or directions for stock size (or its proxy) with respect to precautionary management, consistent with avoiding recruitment overfishing, shall be specified" (p. 14).

### D.2.09

GSSI Component

Guidance



# D . 2 E V I D E N C E O F A L I G N M E N T

## D.2.09

The standard requires that management objectives for the unit of certification and the stock under consideration take into account the interests of fishers engaged in subsistence, small-scale and artisanal fisheries, where applicable.

This Essential Component derives from paragraphs 7.2.1 and 7.2.2 of the CCRF. It cuts across the other components covering management objectives and looks for the requirement to take into account the interests of fishers engaged in small scale and artisanal fisheries in the development of these objectives.

Section 7.2 of the CCRF is titled "Management Objectives". Paragraph 7.2.1 of the CCRF calls for the adoption of appropriate measures (not objectives), based on the best scientific evidence available, which are designed to maintain or restore stocks at levels capable of producing maximum sustainable yield, as qualified by relevant environmental and economic factors, including the special requirements of developing countries. Paragraph 7.2.2 states that such measures should provide that the interests of fishers, including those engaged in subsistence, small-scale and artisanal fisheries, are taken into account. While this language refers specifically to "measures", the need for objectives for those measures is implied, particularly given the text is in section 7.2 which is titled "Management Objectives".

### Conclusion

All Icelandic fisheries covered under the scope of the IRFM Standard are commercial fisheries and do not entail fishermen engaged in subsistence, small-scale and artisanal fisheries. The development of the first version of this standard was facilitated by the Fisheries Association of Iceland (FAI). The FAI was founded in 1911. The following (non-governmental) organizations are members of FAI: Fisheries Iceland (SFS), National Association of Small Boat Owners (NASBO), The Icelandic Seamen's Federation (SSI), The Federation of General and Special Workers in Iceland (SGS), The Icelandic Union of Marine Engineers and Metal Technicians (VM), The Icelandic Ships Officers Association (FFSÍ). These represent all Icelandic fishery stakeholders. The Standard is inclusive. There are no small, scale artisanal fisheries in Iceland within the definition of GSSI. Hence, it makes no sense to include a statement that they are not eligible, when they do not exist.

### References

- [IRFM Standard revision 2.1](#)

## D . 2 E V I D E N C E O F A L I G N M E N T

## D.3 EVIDENCE OF ALIGNMENT

D.3.01	
GSSI Component	Guidance
<p>The standard requires the collection and maintenance of adequate, reliable and current data and/or other information about the state and trends of the stock under consideration in accordance with applicable international standards and practices.</p>	<p>Adequate, reliable and current data and/or other information are those which are commensurate with the development and delivery of the best scientific evidence available. In this case, the requirement for data collection is focused on the assessment of the status and trends of stock under consideration (see Essential Components D.4.01-D.4.03). Adequate, reliable and current data and/or other information can include relevant traditional, fisher or community knowledge, provided its validity can be objectively verified.</p> <p>Some fisheries and/or fish stock are hard to monitor for various reasons, including remoteness of operation/distribution and complexity of fishing operations, posing particular challenges with the collection and maintenance of adequate, reliable and current data and/or other information. To meet this Essential Component the standard must require the fishery to acknowledge and explain these challenges and data collection and maintenance to cover all stages of fishery development, in accordance with applicable international standards and practices.</p> <p>Applicable international standards and practices include the output of the Coordinating Working Party on Fishery Statistics (CWP) and the FAO Guidelines for the routine collection of capture fishery data (1998) FAO Fisheries Technical Paper. No. 382.</p>
Conclusion	References
<p>The IRFM Standard aligns with this essential component through the requirements described in the following clauses: 1.2.2, "The relevant data collected/compiled shall be appropriate to the chosen method of stock assessment for stock under consideration and sufficient for its execution";</p>	<ul style="list-style-type: none"> <li>• <a href="#"><u>IRFM Standard revision 2.1</u></a></li> </ul>

## D . 3 E V I D E N C E O F A L I G N M E N T

### D.3.01

1.2.5, "In the course of research and stock assessment, relevant traditional, fisher and/or community information and/or knowledge shall be sought by the researchers through appropriate means/ fora";

1.2.6, "There shall be active collaboration with international scientific organizations, with the aim of ensuring that the focus is on internationally acknowledged research and assessment methods that provide the best available information on the condition of the stock under consideration at any time"; and

1.2.7 "In cases where the stock under consideration is a shared stock or a straddling stock or a highly migratory stock, there shall be scientific cooperation at the relevant bilateral, regional or international level for obtaining data and/or conducting stock assessments and/or providing advice, as appropriate";

2.3.1.3 "The catch quota of each vessel or vessel group for each fish species and fishing gear shall be recorded in the official central database in a transparent manner.

The definition of the official central database is described on page 9, and refers to the Icelandic Official Central Database maintained by competent fisheries management authorities, in this case the Directorate of Fisheries.

# D . 3 E V I D E N C E O F A L I G N M E N T

D.3.02	
GSSI Component	Guidance
<p>The standard requires the collection and maintenance of adequate, reliable and current data and/or other information about the effects of the unit of certification, including any associated enhancement activities, on ecosystem structure, processes and function in accordance with applicable international standards and practices.</p>	<p>Adequate, reliable and current data and/or other information is described in the Glossary. In general these are data which are commensurate with the development and delivery of the best scientific evidence available. The requirements for data collection are focused on the effects of the unit of certification on the ecosystem, including direct and indirect effects. The adequacy of data relates primarily to the quantity and type of data collected (including sampling coverage) and depends crucially on the nature of the systems being monitored and purposes to which the data are being put. Some analysis of the precision resulting from sampling coverage would normally be part of an assessment of adequacy and reliability. The currency of data is important inter alia because its capacity for supporting reliable assessment of current status and trends declines as it gets older. Adequate, reliable and current data and/or other information can include relevant traditional, fisher or community knowledge, provided its validity can be objectively verified (i.e. the knowledge has been collected and analyzed through a systematic, objective and well-designed process, and is not just hearsay).</p> <p>The requirements for data collection are focused on the effects of the unit of certification on the ecosystem structure, processes and function. The component relating to enhancement activities may be "not applicable" to schemes that explicitly do not cover enhanced fisheries.</p> <p>Ecosystem structure, processes and function are described in the Glossary. This language is in accordance with Section 4.1.4.1 of the FAO Ecosystem Approach to Fisheries, which suggests one of the broad management objectives for a fisheries could be to keep impact on the structure, processes and functions of the ecosystem at an acceptable level.</p> <p>Applicable international standards and practices include the output of the Coordinating Working Party on Fishery Statistics (CWP) and the FAO Guidelines for the routine collection of capture fishery data (1998) FAO Fisheries Technical Paper. No. 382.</p>
Conclusion	References

## D . 3 E V I D E N C E O F A L I G N M E N T

### D.3.02

The collection and maintenance of adequate, reliable and current data and/or other information about the effects of the unit of certification on ecosystem structure, processes and function in accordance with applicable international standards and practices, are covered in the IRFM Standard in the clauses described below.

In relation to broader data collection:

1.2.1 "A competent research institute or arrangement shall collect and/or compile the necessary data and carry out scientific research and assessment of the state of fish stocks and the condition of the ecosystem. Research results shall be made public in a timely and readily understood fashion" (p. 12).

1.2.6 "There shall be active collaboration with international scientific organizations, with the aim of ensuring that the focus is on internationally acknowledged research and assessment methods that provide the best available information on the condition of the stock under consideration at any time" (p. 12).

Specifically in relation to ecosystem impacts:

3.2.1.1 "Information shall be available on fishing gear used in the fishery, including the fishing gears' selectivity and its potential impact on the ecosystem. Stocks of non-target species commonly caught in the fisheries for the stock under consideration may be monitored and their state assessed, as appropriate" (p. 20); and

3.2.1.2 "Information shall be available on the potential effect of fishing on endangered, threatened and protected species, as appropriate and relevant in the context of the unit of certification" (p. 20);

Regarding enhancement activities, enhanced fisheries are not covered under the scope of the IRFM Standard (p. 4, footnote 2).

- [2nd Surveillance Assessment Report \(2021\) Icelandic Cod Commercial Fishery](#)
- Section 7.5.1.2 'Habitat' and 7.5.1.3 'Foodweb considerations' (p. 55-62).
- Referring to clause 3.2.2.3 p259 an evaluation of the performance of the management system regarding discards is provided.

# D . 3 E V I D E N C E O F A L I G N M E N T

## D.3.02

Implementation of the IRFM requirement and alignment with GSSI component is exemplified in, e.g., the 2nd Surveillance Assessment Report (2021) for the Icelandic Cod Commercial Fishery under section 7.5.1.2 'Habitat' and 7.5.1.3 'Foodweb considerations' (p. 55-62).

## D.3.03

GSSI Component	Guidance
<p>The standard requires the collection and maintenance of adequate, reliable and current data and/or other information on non-certified catches and discards in the unit of certification.</p>	<p>Adequate, reliable and current data and/or other information is described in the Glossary. In general these are data which are commensurate with the development and delivery of the best scientific evidence available. The requirements for data collection are focused on the need to assess the effects of the unit of certification on non-target stocks. Non-certified catches and discards refers to species/stocks that are taken by the unit of certification other than the stock for which certification is being sought (see Glossary).</p> <p>The adequacy of data relates primarily to the quantity and type of data collected (including sampling coverage) and depends crucially on the nature of the systems being monitored and purposes to which the data are being put. Some analysis of the precision resulting from sampling coverage would normally be part of an assessment of adequacy and reliability. The currency of data is important inter alia because its capacity for supporting reliable assessment of current status and trends declines as it gets older. Adequate, reliable and current data and/or other information can include relevant traditional, fisher or community knowledge, provided its validity can be objectively verified (i.e. the knowledge has been collected and analyzed through a systematic, objective and well-designed process, and is not just hearsay).</p> <p>The requirements for data collection in this Essential Component are focused on the effects of the unit of certification on non-certified species/stocks. Non-certified catches/stocks are described in the Glossary. Catches of Endangered species are covered in Essential Component D.3.04.</p>

# D . 3 E V I D E N C E O F A L I G N M E N T

## D.3.03

Applicable international standards and practices include the output of the Coordinating Working Party on Fishery Statistics (CWP) and the FAO Guidelines for the routine collection of capture fishery data (1998) FAO Fisheries Technical Paper. No. 382.

### Conclusion

The IRMF Standard defines bycatch as "Discarded catch plus incidental catch" (p 22) and requires in in clause 3.2.2.1 "Discarding, including discarding of catches from non-target commercial stocks, is prohibited" meaning that all fish caught need to be landed.

Fish catches are monitored in the Official Central Database, as defined on page 9, that should be used for prompt recording and continual updating of the following minimum information, including "(...) the amounts of fish landed by each vessel at each landing by species, area, vessel and date". Recording of catches further prescribed by the following clauses:

- 2.3.1.3 "The catch quota of each vessel or vessel group for each fish species and fishing year shall be recorded in the official central data base in a transparent manner" (p. 17);
- 2.3.2.11 "In cases of mixed species catches, all commercial species shall be landed" (p. 18);
- 2.3.2.12 "Landings shall be monitored. Harbor officials and fisheries inspectors shall monitor the correct weighing and registration of the catch" (p. 18);
- 2.3.2.13 "Catch shall be weighed by species at landing" (p. 18);
- 2.3.2.14 "The weight (whole weight or gutted weight) by species of all catches of "stock under consideration" and by-catch species shall be measured by authorized harbor officials at landing and recorded in the official central database (date, vessel, gear type, location, species, quantity)" (p. 18);
- 2.3.2.15 "There is systematic monitoring of landing, weighing and registration of catches and discrepancies/deviations shall be recorded" (p. 18)

### References

[IRFM Standard revision 2.1](#)



# D . 3 E V I D E N C E O F A L I G N M E N T

D.3.03.02	
GSSI Component	Guidance
<p>The Standard requires that where information is insufficient to conduct a risk assessment to identify the specific nature and extent of bycatch and discard problems in the fishery of which the unit of certification is part (see D.4.06.01), additional research should be conducted on the biology of species taken as bycatch, the performance of fishing gears and mitigation measures and the social and economic consequences of measures and techniques to manage bycatch and reduce discard mortality.</p>	<p>This Supplementary Component lists a range of topics for additional research that should be conducted in the event that there is insufficient information to conduct a risk assessment to identify the nature and extent of bycatch and discard problems in the fishery. This is related to Supplementary Component D.5.04.02 which makes reference (in the Guidance to Auditors) to this same risk assessment. The risk assessment is required under D.4.06.01. To meet this Supplementary Component, the standard would need to require this research to be undertaken, or for there to be sufficient information already available for the risk assessment.</p>
Conclusion	References
<p>The IRF Standard is in alignment, as it requires that where information is insufficient to conduct a risk assessment to identify the specific nature and extent of bycatch and discard problems in the fishery of which the unit of certification is part (see D.4.06.01), additional research should be conducted on the biology of species taken as bycatch, the performance of fishing gears and mitigation measures and the social and economic consequences of measures and techniques to manage bycatch and reduce discard mortality.</p> <p>The Standard also requires an evaluation of the fishery management system against;                  2.3.2.2 The fishing gear shall be subject to inspection, as well as the composition of the catch and its handling onboard the fishing vessels.                  Clause 3.2.1.1. Information shall be available on fishing gear used in the fishery, including the fishing gears' selectivity and its potential impact on the ecosystem. Stocks of non-target species commonly caught in the fisheries for the stock under consideration may be monitored and their state assessed, as appropriate.</p>	<p><u><a href="#">IRFM Standard revision 2.1</a></u>  <u><a href="#">Redfish re assessment report July 2019</a></u></p> <ul style="list-style-type: none"> <li>▪ Referring to clause 2.3.2.2 p155 an evaluation of the performance of the fishery management system regarding fishing gear inspection is provided.</li> <li>▪ Referring to clause 3.2.1.1 9, the assessment team provides an evaluation of fishing gears.</li> <li>▪ Referring to clause 3.2.2.3 p259 an evaluation of the performance of the management system regarding discards is provided</li> </ul>

# D . 3 E V I D E N C E O F A L I G N M E N T

## D.3.03.02

3.2.2.3 Non-target catches, including discards, of stocks other than the “stock under consideration” should not threaten these non-target stocks with serious risk of extinction; if serious risks of extinction arise, effective remedial action should be taken.

## D.3.03.03

### GSSI Component

The Standard requires that the management system implements data collection procedures and protocols appropriate to the scale and type of fishery and taking into account the results of a risk assessment (see D.4.06.01), including the use of observers, standardized logbooks and vessel position monitoring systems to ensure effective monitoring of non-target catches and discards in the unit of certification, including catch handling on board the fishing vessel and landings at ports.

### Guidance

While D.3.03.02 requires research (where necessary) to enable the undertaking of a risk assessment to identify the nature and extent of bycatch and discard problems in the fishery, this Supplementary Component requires data collection to ensure effective monitoring of non-target catches and discards in the unit of certification taking into account the results of the risk assessment. The risk assessment is the same one as referred to in the Guidance to Auditors for Supplementary Component D.5.04.02 and required under D.4.06.01.

### Conclusion

The IRF Standard is in alignment, as whilst it does not specifically require fishery observers (see D30301), the monitoring requirements under Section 2. Compliance and Monitoring (p. 16 to 19), specifically under 2.3.2 “Fishing vessel monitoring and control systems”, do require that vessels and catch data (including non-target catches) is adequately recorded and monitored, appropriate to the needs of management and the fishery.

This can be seen in the following clauses:

### References

- [IRFM Standard revision 2.1](#)
  - Clauses in the Standard:
    - 2.3.2.4
    - 2.3.2.5
    - 2.3.2.6

## D . 3 E V I D E N C E O F A L I G N M E N T

### D.3.03.03

2.3.2.1 A program for the monitoring and control of fishing vessel activities shall be operated and enforcement shall be in place to prevent fishing by unauthorised vessels.

2.3.2.2 The fishing gear shall be subject to inspection, as well as the composition of the catch and its handling onboard the fishing vessels.

2.3.2.6 The timely and correct recording of catches in fishing logbooks *shall be* monitored by comparing the recorded catch amounts with the catch stored aboard the vessel at time of inspection.

2.3.2.9 Monitoring and control measures shall be in place and shall be conducted in a manner to encourage and demonstrate compliance (and deter unreported landings).

Referring to Icelandic Ling Commercial Fishery 2<sup>nd</sup> Surveillance Assessment Report Dec 2021, p33 provides a summary of enforcement and compliance data, including the use of VMS systems with an evaluation of the performance of the management system for ling on p67-69.

- [Link 2<sup>nd</sup> surveillance assessment report dec 2019](#)

### D.3.04

GSSI Component	Guidance
The standard requires the collection and maintenance of adequate, reliable and current data and/or other information about the effects of the unit of	Adequate, reliable and current data and/or other information is described in the Glossary. In general these are data which are commensurate with the development and delivery of the best scientific evidence available. The requirements for data collection are focused on the effects of the unit of certification on the ecosystem, including direct and indirect effects. The adequacy of data relates primarily to the quantity and type of data collected (including sampling coverage) and depends crucially on the nature of the systems being monitored and purposes to which the data are being put. Some analysis of the precision resulting from sampling coverage would normally be part of an assessment of adequacy and reliability. The currency of data is important inter alia because its capacity

# D . 3 E V I D E N C E O F A L I G N M E N T

## D.3.04

certification, including any associated enhancement activities, on endangered species in accordance with applicable international standards and practices.

for supporting reliable assessment of current status and trends declines as it gets older. Adequate, reliable and current data and/or other information can include relevant traditional, fisher or community knowledge, provided its validity can be objectively verified (i.e. the knowledge has been collected and analyzed through a systematic, objective and well-designed process, and is not just hearsay).

The requirements for data collection are focused on the effects of the unit of certification on endangered species. The component relating to enhancement activities may be "not applicable" to schemes that explicitly do not cover enhanced fisheries. Endangered species are described in the Glossary.

Applicable international standards and practices include the output of the Coordinating Working Party on Fishery Statistics (CWP) and the FAO Guidelines for the routine collection of capture fishery data (1998) FAO Fisheries Technical Paper. No. 382.

### Conclusion

The collection and maintenance of adequate, reliable and current data and/or other information about the effects of the unit of certification on endangered species, are covered in the IRFM Standard in the clauses described below.

In relation to broader data collection:

1.2.1 "A competent research institute or arrangement shall collect and/or compile the necessary data and carry out scientific research and assessment of the state of fish stocks and the condition of the ecosystem. Research results shall be made public in a timely and readily understood fashion" (p. 12).

1.2.6 "There shall be active collaboration with international scientific organizations, with the aim of ensuring that the focus is on internationally acknowledged research and assessment methods that provide the best available information on the condition of the stock under consideration at any time" (p. 12).

### References

- [IRFM Standard revision 2.1](#)

#### [2nd Surveillance Assessment Report Icelandic Ling Commercial Fisheries](#)

- Section 3 'Ecosystem considerations' (p. 78-80) and 'Endangered, Threatened and Protected (ETP) and vulnerable species interactions' (p. 50-54).

# D . 3 E V I D E N C E O F A L I G N M E N T

## D.3.04

In relation to endangered species:

3.2.1.2 "Information shall be available on the potential effect of fishing on endangered, threatened and protected species, as appropriate and relevant in the context of the unit of certification" (p. 20); and

3.2.2.4 "Suitable steps shall be considered to avoid, minimize or mitigate encounters with endangered, threatened and protected species, as appropriate and relevant in the context of the unit of certification" (p. 21).

Regarding enhancement activities, enhanced fisheries are not covered under the scope of the IRFM Standard (p. 4, footnote 2).

Example of this can be found in the 2nd Surveillance Assessment Report (2021) for Icelandic Ling Commercial Fishery, Section 3 'Ecosystem considerations' (p. 78-80) and 'Endangered, Threatened and Protected (ETP) and vulnerable species interactions' (p. 50-54).

## D.3.05

GSSI Component	Guidance
<p>The standard requires that there is knowledge within the fishery management system of the essential habitats for the stock under consideration and habitats that are highly vulnerable to damage by the fishing gear of the unit of certification. This includes knowledge of the full spatial range of the relevant habitat, not</p>	<p>The level of knowledge of the essential habitats for the stock under consideration and habitats that are highly vulnerable to damage by the fishing gear of the unit of certification should provide sufficient understanding to enable impacts of the unit of certification on those habitats to be avoided, minimized or mitigated; i.e. for the management objective with respect to habitat (D.2.06) to be achieved. The achievement of this Essential Component should be considered alongside D.4.08 and D.6.07. In particular, the FAO Ecolabelling Guidelines acknowledge the importance of a "risk assessment/risk management approach" to address the issue of greater scientific uncertainty associated with ecosystem impacts; also that the most probable adverse impacts should be considered, taking into account available scientific information, and traditional, fisher or community</p>

# D . 3 E V I D E N C E O F A L I G N M E N T

## D.3.05

just that part of the spatial range that is potentially affected by fishing.

knowledge provided that its validity can be objectively verified. The knowledge of the habitats in question can therefore include relevant traditional, fisher or community knowledge, provided its validity can be objectively verified (i.e. the knowledge has been collected and analyzed through a systematic, objective and well-designed process, and is not just hearsay).

### Conclusion

The Icelandic Marine Institute (MRI) provides maps both for spawning areas for key species, and those areas are closed to fishing at those times by Icelandic fishery management, as well as habitats that are vulnerable to the effects of fishing, therefore, those areas are also closed to particular fisheries by Icelandic fisheries management.

Knowledge on essential habitats, and their full spatial range, that are highly vulnerable to damage by fishing gear of the unit is required by IRFM Standard through the following clauses:

3.1.1 "Adverse impacts of the fishery on the ecosystem shall be considered and appropriately assessed and effectively addressed, consistent with the precautionary approach";

3.1.2 "Those impacts that are likely to have serious consequences shall be addressed. This may take the form of an immediate management response or further analysis of the identified risk";

3.2.1.1 "Information shall be collected, maintained and available on fishing gear used in the fishery, including the fishing gears' selectivity and its potential impact on the ecosystem. Stocks of non-target species commonly caught in the fisheries for the stock under consideration shall may be monitored and their state assessed, as appropriate";

3.2.3.1 "If studies show that the spawning or nursery areas or other essential habitats in the fishing area are at risk and highly vulnerable to negative impacts of particular fishing gear, such impacts shall be limited in range relative to the full spatial range of the habitat or else action is taken to avoid, minimize or mitigate such impacts".

### References

- [IRFM Standard revision 2.1](#)
- [Form 9h IRFM Golden redfish 2nd Surveillance Report](#)
- Pages 56-62 and 81-84

# D . 3 E V I D E N C E O F A L I G N M E N T

## D.3.05

Pages 56–62 and 81–84 of 2nd Surveillance Assessment Report (2021) for Icelandic Golden Redfish Commercial Fishery demonstrate this particular component.

## D.3.06

GSSI Component	Guidance
<p>The standard requires that data and information are collected on the role of the stock under consideration in the food-web to enable determination of whether it is a key prey species in the ecosystem, and if so whether fishing on that stock might result in severe adverse impacts on dependent predators.</p>	<p>The data and information collected must be sufficient to provide adequate knowledge of the role of the stock under consideration in the food-web to determine whether it is a key prey species and, if so, whether fishing on that stock under consideration might result in severe adverse impacts on dependent predators. Where the stock under consideration is a key prey species, the standard must require that fishing mortality on that species/stock is managed so as not to result in severe adverse impacts on Dependent Predators. The FAO Guidelines require that all sources of fishing mortality on the stock under consideration are taken into account (whether or not it is a prey species) in assessing the state of the stock under consideration, including discards, unobserved mortality, incidental mortality, unreported catches and catches in other fisheries.</p> <p>Data and information on the role of the stock under consideration in the food-web can include relevant traditional, fisher or community knowledge, provided its validity can be objectively verified (i.e. the knowledge has been collected and analyzed through a systematic, objective and well-designed process, and is not just hearsay).</p>
Conclusion	References
<p>The collection of data and information on role of the stock under consideration in the food-web to determine whether it is a key prey species and dependent predator impact is required by the IRFM through the following two clauses.</p> <p>In the broader sense of data collection on the ecosystem:</p>	<ul style="list-style-type: none"> <li>• 2nd Surveillance Assessment Report (2021) Icelandic Summer Spawning Herring Commercial Fishery</li> </ul>

# D . 3 E V I D E N C E O F A L I G N M E N T

## D.3.06

1.2.1 "A competent research institute or arrangement shall collect and/or compile the necessary data and carry out scientific research and assessment of the state of fish stocks and the condition of the ecosystem. Research results shall be made public in a timely and readily understood fashion".

Specific to food-web interactions:

3.2.4.1 "Food web considerations - If the stock under consideration is a key prey species in the ecosystem, the harvesting policy and management measures shall be directed to avoid severe adverse impacts on dependent predators".

Icelandic Summer Spawning Herring is considered a prey-species and section 'Foodweb considerations' on page 45 of the 2nd Surveillance Assessment Report of the Icelandic Summer Spawning Herring Commercial Fishery demonstrates implementation of data collected to assess the impact of the commercial fishery on dependent predators.

- Section 'Foodweb considerations' page 45
- [2nd Surveillance Assessment Report Icelandic Summer Spawning Herring \(2021\)](#)

## D.3.07

GSSI Component	Guidance
<p>The standard requires that any traditional, fisher or community knowledge used within the management system can be objectively verified.</p>	<p>The methods by which traditional, fisher or community knowledge can be objectively verified will vary between fisheries, and will need to be assessed by the auditors. Elsewhere in the Benchmark there is the general suggestion that the knowledge should be collected and analyzed through a systematic, objective and well-designed process, and is not be just hearsay. Scientific uncertainty associated with the use of traditional, fisher or community knowledge can be assessed using a risk assessment/risk management approach, as specified in the Guidelines. In all cases, the management measures implemented by the management system must be based on the best scientific evidence available (Essential Components D.1.03 to D.1.04).</p>
<p>Conclusion</p>	<p>References</p>



## D . 3 E V I D E N C E O F A L I G N M E N T

### D.3.07

The IRFM Standard v2.1 is in alignment because:

1.2.1 A competent research institute or arrangement shall collect and/or compile the necessary data and carry out scientific research and assessment of the state of fish stocks and the condition of the ecosystem. Research results shall be made public in a timely and readily understood fashion. In the course of research and stock assessment, **relevant traditional, fisher and/or community information and/or knowledge shall be sought by the researchers** through appropriate means/fora.

3.1.1 Adverse impacts of the fishery on the ecosystem shall be considered and appropriately assessed and effectively addressed, consistent with the precautionary approach. The clause references 2009 FAO Guidelines for Ecolabelling of Fish and Fishery Products from Marine Capture Fisheries, Article 31: Adverse impacts of the fishery on the ecosystem should be appropriately addressed. Much greater scientific uncertainty is to be expected in assessing possible adverse ecosystem impacts of fisheries than in assessing the state of target stocks. This issue can be addressed by taking a “risk assessment/risk management approach”. For the purpose of development of ecolabelling schemes, the most probable adverse impacts should be considered, taking into account available scientific information, and traditional, fisher or community knowledge provided that its validity can be objectively verified. Those impacts that are likely to have serious consequences should be addressed. This may take the form of an immediate management response or further analysis of the identified risk.

Of relevance, all catch data from all vessels is recorded and reported in a central database, providing a fundamental basis to the validity of fisher information.

- [IRFM Standard revision 2.1](#)

# D . 3 E V I D E N C E O F A L I G N M E N T

D.3.08	
GSSI Component	Guidance
In the case of enhanced fisheries, the standard requires the collection and maintenance of adequate, reliable and current data and/or other information about enhanced components of the stock under consideration in accordance with applicable international standards and practices.	Collection and maintenance of adequate, reliable and current data and/or other information about enhanced components of the stock under consideration is necessary to assess whether Enhanced Fisheries meet the criteria specified in the Inland Guidelines (starting with paragraph 38) necessary for them to be within scope. Adequate, reliable and current data and/or other information are those which are commensurate with the development and delivery of the best scientific evidence available. In this case, the requirement for data collection is focused on any enhanced components of the stock under consideration. Adequate, reliable and current data and/or other information can include relevant traditional, fisher or community knowledge, provided its validity can be objectively verified. Applicable international standards and practices include the output of the Coordinating Working Party on Fishery Statistics (CWP) and the FAO Guidelines for the routine collection of capture fishery data (1998) FAO Fisheries Technical Paper. No. 382.
Conclusion	References
Enhanced fisheries are not covered under the scope of the IRFM Standard (p. 4, footnote 2).	<a href="#"><u>IRFM Standard revision 2.1</u></a>

## D.4 EVIDENCE OF ALIGNMENT

D.4.01	
GSSI Component	Guidance
<p>The standard requires management decisions by the Designated Authority (D.1.01) to be based on an assessment of the current status and trends of the stock under consideration, using adequate, reliable and current data and/or other information. Other information may include generic evidence based on similar stocks, when specific information on the stock under consideration is not available, providing there is low risk to the stock under consideration in</p>	<p>This is a partner Essential Component to D.3.01 which covers the collection and maintenance of the data to be used in the stock assessment referred to in this Essential Component. The purpose of the stock assessment is to contribute to the best scientific evidence available which is used by the fishery management organization or arrangement (D.1.03 - D.1.05) to establish management objectives for the stock under consideration (D.2), management measures (D.5) to meet those objectives and evidence regarding outcome status (D.6) - i.e. whether the objectives have been met.</p> <p>The Ecolabelling Guidelines provide additional guidance on the use of data in the stock assessment. Specifically, in the absence of specific information on the stock under consideration, generic evidence based on similar stocks can be used for fisheries with low risk to that stock under consideration. The language of the Essential Component aligns with this text, however, it raises a concern that this approach could be used inappropriately in cases where the risk to the stock under consideration is not "low". The greater the risk, the more specific evidence is necessary to assess sustainability. In principle, 'generic evidence based on similar stocks' should not suffice, but it may be adequate where there is low risk to the stock under consideration. In general, "Low risk to the stock under consideration" would suggest that there is very little chance of the stock becoming overfished, for example where the exploitation rate is very low and the resilience of the stock is high (see Essential Component D.4.03). However, the Standard should make it clear that the evidence for low risk and the justification for using surrogate data must come from the stock assessment itself.</p>

# D . 4 E V I D E N C E O F A L I G N M E N T

## D.4.01

accordance with the Precautionary Approach.

The aim of this Essential Component, in conjunction with Essential Component D.4.04, is to avoid the use of less elaborate methods of stock assessment automatically precluding fisheries from potential certification. Nevertheless, to the extent that the application of such methods results in greater uncertainty about the state of the stock under consideration, more precaution must be applied in managing fisheries on such stocks. This may, for example, necessitate lower levels of utilization of the resource than would be possible with lower levels of uncertainty, in accordance with the Essential Components covering the Precautionary Approach (D.1.06) and the Best Scientific Evidence Available (D.1.03 – D.1.05).

### Conclusion

The IRFM Standard prescribes in the following clauses:

1.3.1.1 "The precautionary approach shall be implemented to protect the stock under consideration" (p. 13);

1.5.1 "A competent scientific body, research institute, designated advisory body or arrangement shall provide the competent fisheries management authority with fishery advise on the harvesting of the stock under consideration, in a timely manner" (p. 15), connecting with clause 1.2.1 that requires "A competent research institute or arrangement shall collect and/or compile the necessary data and carry out scientific research and assessment of the state of the fish stocks and the condition of the ecosystem. (...)" (p.12).

1.5.10 "In the absence of specific information on the stock under consideration, generic evidence based on similar stocks may be used for fisheries with low risk to that stock under consideration. However, the greater the risk the more specific evidence is necessary to ascertain the sustainability of intensive fisheries" (p. 15).

1.1.10 The Fisheries Management Plan shall also consider the following:

And under 1.1.10.4 A description of the process for making decisions on Total Allowable Catch (TAC) – how and on what basis management decisions are made;

### References

[IRFM Standard revision 2.1 Fisheries Management Plan Golden Redfish](#)

# D . 4 E V I D E N C E O F A L I G N M E N T

# D . 4 E V I D E N C E O F A L I G N M E N T

D.4.02	
GSSI Component	Guidance
<p>The standard requires that the assessment of the current status and trends of the stock under consideration considers total fishing mortality on that stock from all sources including discards, unobserved mortality, incidental mortality, unreported catches and catches in all fisheries over its entire area of distribution.</p>	<p>This is a partner Essential Component to D.5.01. Management measures for the stock under consideration must be based on an assessment of that stock which takes account of all removals from the stock over its entire area of distribution, i.e. not just by the unit of certification but by all fisheries that utilize that stock, including bycatch, discards, unobserved mortality, incidental mortality, unreported catches, and catches taken outside of the unit of certification. Note that these terms are not defined here, or in the Glossary. They are used collectively in this context to cover all possible descriptions of fishery removals of the stock under consideration. See also Essential Component D.1.12 covering the effective and suitable monitoring, surveillance, control and enforcement of the fishery of which the unit of certification is a part.</p> <p>Area of Distribution is described in the Glossary based on a CITES reference for species, but in the context of fish and fisheries, this can be used for stocks.</p>
Conclusion	References
<p>In the definition of stock under consideration, the IRFM Standard states that "In assessing compliance with this Standard, the impacts on the stock under consideration of all the fisheries utilizing that stock under consideration over its entire area of distribution are to be considered" (p. 9).</p> <p>The IRFM Standard further requires through indicator 1.2.4 that "For the stock under consideration, the determination of suitable conservation and management measures shall include or take account of total fishing mortality from all sources in assessing the state of the stock under consideration, including: 1.2.4.1 Estimates of discards; 1.2.4.2 Unobserved and incidental mortality,</p>	<p><a href="#"><u>IRFM Standard revision 2.1</u></a></p>

# D . 4 E V I D E N C E O F A L I G N M E N T

## D.4.02

1.2.4.3 Unreported catches and catches in other fisheries" (p. 12)

# D . 4 E V I D E N C E O F A L I G N M E N T

D.4.03		
GSSI Component	Guidance	
The standard requires that the assessment of the current status and trends of the stock under consideration takes into account the structure and composition of that stock which contribute to its resilience.	Resilience is described in the Glossary. Understanding the resilience of a stock (i.e. it's ability to recover from a disturbance) is an important part of assessing that stock's status and trends and contributes to an assessment of the level of risk to that stock (see Essential Component D.4.01).	
Conclusion		References
Under the section 1.3.2.3 Stock Biology and life-cycle of the IRFM Standard, clause 1.3.2.3.1 requires that "Information on the biology, life-cycle and structure of the stock shall be taken into account when designing management measures to promote utilization of the stock with respect to resilience to natural variability and fishing"		<a href="#"><i>IRFM Standard revision 2.1</i></a>



# D . 4 E V I D E N C E O F A L I G N M E N T

D404	
GSSI Component	Guidance
In the case of enhanced fisheries, the standard requires that the assessment of current status and trends of the stock under consideration includes an evaluation of whether there are significant negative impacts of enhancement activities on the naturally reproductive component of the stock under consideration.	<p>This Essential Component addresses the need for standards to require an assessment to support the achievement of management objectives specified in Essential Component D.2.05. It refers to Enhanced Fisheries, hence it may be regarded as not applicable if the Scheme/Standard explicitly excludes enhanced fisheries (see also Guidance for D.2.05) The term natural reproductive stock components is explained in the Glossary. The term "significant negative impacts" is used in the Inland Guidelines. This was not intended to be equivalent to severe adverse impacts (on dependent predators). The consultation that resulted in the drafting of the Inland Guidelines considered that avoidance of "severe adverse impacts" only would not be consistent with a management obligation to manage enhancement in ways that would not impact the productivity and abundance of the natural reproductive stock component of the stock under consideration.</p> <p>The Guidelines specifically require that naturally reproductive components of enhanced stocks are not substantially displaced by stocked components. In particular, displacement must not result in a reduction of the natural reproductive stock component below abundance-based target reference points (or their proxies). With respect to aquaculture production of organisms for stocking, there should be an advance evaluation of the effects of aquaculture development on genetic diversity and ecosystem integrity, based on the best scientific information available.</p>
Conclusion	References
Enhanced fisheries are not covered under the scope of the IRFM Standard (p. 4, footnote 2).	<a href="#"><u>IRFM Standard revision 2.1</u></a>

# D . 4 E V I D E N C E O F A L I G N M E N T

D.4.05	
GSSI Component	Guidance
In the case of fisheries that are enhanced through aquaculture inputs, the standard requires that the stock assessment of the stock under consideration must consider the separate contributions from aquaculture and natural production.	<p>This is a technical requirement applicable to stock assessments of fisheries that are enhanced through aquaculture inputs. If fisheries that are enhanced through aquaculture inputs are explicitly out of scope for the scheme, then this Essential Component is not applicable.</p> <p>The glossary entry for Enhanced Fisheries explains that enhancement may entail stocking with material originating from aquaculture installations, translocations from the wild and habitat modification. Accordingly, aquaculture inputs refers to any stocking with material originating from aquaculture installations.</p>
Conclusion	References
Enhanced fisheries are not covered under the scope of the IRFM Standard (p. 4, footnote 2).	<a href="#"><u>IRFM Standard revision 2.1</u></a>

# D . 4 E V I D E N C E O F A L I G N M E N T

D.4.06		
GSSI Component	Guidance	
<p>The standard requires an assessment of the extent to which catches and discards by the unit of certification of stocks other than the stock under consideration and any associated culture and enhancement activities threaten those stocks with recruitment overfishing or other impacts that are likely to be irreversible or very slowly reversible.</p>	<p>This is the partner Essential Component of D.3.03 that requires the collection and maintenance of adequate, reliable and current data and/or other information on non-target catches and discards in the unit of certification. Non-target catches and discards refers to species/stocks that are taken by the unit of certification other than the stock for which certification is being sought (see Glossary).</p> <p>This Essential Component addresses the need for standards to require an assessment to support the achievement of management objectives specified in Essential Component D.2.06. This Essential Component is explicitly and deliberately confined to the effects of non-target catches and discards by the unit of certification on those non-target species/stocks. Cumulative effects on non-target species/stocks are not included in the Ecolabelling Guidelines. They are not part of the Essential Components, but they are covered in the Supplemental Components. The component relating to enhancement activity may be "not applicable" to schemes that explicitly do not cover enhanced fisheries. Non-target catches/stocks are described in the Glossary.</p> <p>Examples of irreversible or very slowly reversible effects on bycatch species include excessive depletion of very long-lived organisms (see Glossary).</p>	
Conclusion	References	
<p>The IRFM Standard covers this component through its clauses on ecosystem structure, process and function. More specifically:</p> <p>3.1.1 "Adverse impacts of the fishery on the ecosystem shall be considered and appropriately assessed and effectively addressed, consistent with the precautionary approach";</p>	<p><a href="#"><u>2nd Surveillance Assessment Report Icelandic Ling Commercial Fisheries</u></a></p> <ul style="list-style-type: none"> <li>• Pages 41-50</li> </ul>	

## D . 4 E V I D E N C E O F A L I G N M E N T

### D.4.06

3.1.2 "Those impacts that are likely to have serious consequences shall be addressed. This may take the form of an immediate management response or further analysis of the identified risk";

3.2.1.1 "Information shall be available on fishing gear used in the fishery, including the fishing gears' selectivity and its potential impact on the ecosystem. Stocks of non-target species commonly caught in the fisheries for the stock under consideration may be monitored and their state assessed as appropriate".

In relation to enhancement activities, enhanced fisheries are not covered under the scope of the IRFM Standard (p. 4, footnote 2).

An example of this can be found on pages 41-50 of the 2nd Surveillance Assessment Report (2021) Icelandic Ling Commercial Fishery, that details and assesses catches of non-target stock.

# D . 4 E V I D E N C E O F A L I G N M E N T

D.4.06.01		
GSSI Component	Guidance	
The standard requires a risk assessment to identify the specific nature and extent of bycatch and discard problems in the fishery of which the unit of certification is part as a basis for prioritization and planning.	The parent Essential Component requires an analysis of the effects of the unit of certification, including any enhancement activities, on ecosystem structure, processes and function. This Supplementary Component focuses on the requirement for a risk assessment to identify the specific nature and extent of bycatch and discard problems in the fishery. Several other Supplementary Components make reference to this risk assessment, and either require data collection activity based on its results (D.3.03.03), or additional research to make it possible (D.3.03.02).	
Conclusion	References	
<p>The IRFM Standard prohibits discarding (2.3.2.7, p. 17 and 3.2.2.1, p. 20 ) and has bycatch is defined as "Discard catch plus incidental catch" (p. 22)</p> <p>Therefore, all catches are accounted for by under fishery management plan and as a result, the Standard does not require a specific risk assessment in relation to discards as this is already taken in consideration.</p> <p>Regarding enhancement activities, enhanced fisheries are not covered under the scope of the IRFM Standard (p. 4, footnote 2).</p> <p>The Icelandic fisheries has reduced the risk of bycatch and discarding to minimum levels. This is evidenced in the certification reports. For example under heading Protective Measures on page 20 for the 2nd Surveillance Assessment Report Icelandic Tusk Commercial Fishery.</p>	<ul style="list-style-type: none"> <li>• <a href="#"><u>Icelandic Tusk Commercial Fishery 2nd Surveillance Report 2021</u></a> <ul style="list-style-type: none"> <li>▪ Heading Protective Measures on page 19</li> </ul> </li> </ul>	

D.4.06.02	
GSSI Component	Guidance

# D . 4 E V I D E N C E O F A L I G N M E N T

## D.4.06.02

The standard requires that the management system addresses in bycatch management planning all significant sources of fishing mortality in the fishery of which the unit of certification is part and that such planning is based on an ecosystem approach to fisheries.

The parent Essential Component requires an analysis of the effects of the unit of certification, including any enhancement activities, on ecosystem structure, processes and function. This Supplementary Component focuses on the requirement to address all significant sources of fishing mortality.

### Conclusion

The IRFM Standard requires the management system to address fishing mortality under the following clause:

1.2.4 "For the stock under consideration, the determination of suitable conservation and management measures shall include or take account of total fishing mortality from all sources in assessing the state of the stock under consideration, including:

1.2.4.1 Estimates of discards;

1.2.4.2 Unobserved and incidental mortality;

1.2.4.3 Unreported catches and catches in other fisheries" (p. 12)

In relation to an ecosystem approach to fisheries, this is implicitly covered through Section 3 "Ecosystem Consideration", specifically 3.1.1. Adverse impacts of the fishery on the ecosystem shall be considered and appropriately assessed and effectively addressed, consistent with the precautionary approach" (p. 20) as an overarching requirement that is in line with EAF.

In relation to enhancement activities, enhanced fisheries are not covered under the scope of the IRFM Standard (p. 4, footnote 2).

### References

- [Form 9h IRFM Golden redbfish 2nd Surveillance Report](#)
- Pages 26-30

# D . 4 E V I D E N C E O F A L I G N M E N T

## D.4.06.02

This is exemplified in the 2nd Surveillance Assessment Report for Icelandic Golden Redfish Commercial Fishery, on page 26-30 that deals with fishing mortality.

# D . 4 E V I D E N C E O F A L I G N M E N T

D.4.07	
GSSI Component	Guidance
<p>The standard requires an analysis of the effects of the unit of certification, including any associated enhancement activities where applicable, on ecosystem structure, processes and function to develop timely scientific advice on the likelihood and magnitude of impacts.</p>	<p>This is the partner Essential Component of D.3.02 that requires the collection and maintenance of adequate, reliable and current data and/or other information about the effects of the unit of certification, including any enhancement activities, on ecosystem structure, processes and function. The component relating to enhancement activity may be "not applicable" to schemes that explicitly do not cover enhanced fisheries. Ecosystem structure, processes and function are described in the Glossary. This language is in accordance with Section 4.1.4.1 of the FAO Ecosystem Approach to Fisheries, which suggests one of the broad management objectives for a fisheries could be to keep impact on the structure, processes and functions of the ecosystem at an acceptable level.</p>
	<p>This requirement is about the analysis of these data to develop the best scientific evidence available regarding the ecosystem effects of fishing, which is used by the fishery management organization or arrangement (D.1.03 - D.1.05) to establish management objectives (D.2) and management measures (D.5) to meet those objectives..</p>
	<p>The data and analysis may include local, traditional or indigenous knowledge and research, providing its validity can be objectively verified.</p>
	<p>As expressed in the Guidance relating to the Essential Component on the precautionary approach (D.1.06), much greater scientific uncertainty is to be expected in assessing possible adverse ecosystem impacts of fisheries than in assessing the state of target stocks. This issue can be addressed by taking a risk assessment/risk management approach. Note that some ecosystem impacts such as those on bycatch species are often more readily quantifiable than others, such as those on habitat. While a risk assessment approach may mitigate a lack of quantitative information, the management system must still ensure adequate mitigation of adverse impacts.</p>
Conclusion	References
<p>The IRFM Standard is in alignment, as it requires the following actions in relation to analyzing ecosystem structure, processes and function:</p>	<p><a href="#"><i>IRFM Standard revision 2.1</i></a></p>



## D . 4 E V I D E N C E O F A L I G N M E N T

### D.4.07

In a broader sense analyzing the ecosystem:

1.2.1 "A competent research institute or arrangement shall collect and/or compile the necessary data and carry out scientific research and assessment of the state of fish stocks and the condition of the ecosystem".

Specifically to analyzing of effects on ecosystem structure, processes and function:

3.1.1 "Adverse impacts of the fishery on the ecosystem shall be considered and appropriately assessed and effectively addressed, consistent with the precautionary approach";

3.1.2 "Those impacts that are likely to have serious consequences shall be addressed. This may take the form of an immediate management response or further analysis of the identified risk"; and

3.2.1.1 "Information shall be available on fishing gear used in the fishery, including the fishing gears' selectivity and its potential impact on the ecosystem. Stocks of non-target species commonly caught in the fisheries for the stock under consideration may be monitored and their state assessed as appropriate".

In relation to enhancement activities, enhanced fisheries are not covered under the scope of the IRFM Standard (p. 4, footnote 2).

For additional detail, refer to the Iceland Ling initial assessment report- p114 referring to clause 3.1.1 provides summary evidence relating to analysis of the effects of the unit of certification, including any associated enhancement activities where applicable, on ecosystem structure, processes and function to develop timely scientific advice on the likelihood and magnitude of impacts 'The available evidence indicates that the adverse impacts of the fishery on the ecosystem are considered, assessed and appropriately addressed in a manner consistent with the precautionary approach as required by the IRFF Standard. Further evidence of reliable data collection from the improved observer programme and the electronic logbook reporting system would increase confidence that there are no adverse impacts on vulnerable species, marine mammals and seabirds. By-catch rates of harbour porpoise should be kept under review and assessed in light of updated stock assessments as they

[Iceland Ling initial assessment report Aug 2019](#)

## D . 4 E V I D E N C E O F A L I G N M E N T

### D.4.07

come available. Further action may be required if rates remain high'. Pages 123-124 provides further details of the evaluation of this fishery.

# D . 4 E V I D E N C E O F A L I G N M E N T

D.4.08		
GSSI Component	Guidance	
<p>The standard requires an assessment of the impacts of the unit of certification, including any associated enhancement activities where applicable, on essential habitats for the stock under consideration and on habitats that are highly vulnerable to damage by the fishing gear of the unit of certification. The assessment should consider the full spatial range of the relevant habitat, not just that part of the spatial range that is potentially affected by fishing.</p>	<p>This is the partner Essential Component of D.3.05 that requires knowledge within the fishery management system of the essential habitats for the stock under consideration and habitats that are highly vulnerable to damage by the fishing gear of the unit of certification. Under this Essential Component the standard must require an assessment of the impacts of the unit of certification on these habitats. The component relating to enhancement activity may be "not applicable" to schemes that explicitly do not cover enhanced fisheries. The results of the assessment should provide sufficient understanding of the relevant habitats and fishery impacts on them to enable those impacts to be avoided, minimized or mitigated; i.e. for the management objective with respect to habitat (D.2.06) to be achieved. The achievement of this Essential Component should be considered alongside D.3.05 and D.6.07. In particular, the FAO Ecolabelling Guidelines acknowledge the importance of a "risk assessment/risk management approach" to address the issue of greater scientific uncertainty; also that the most probable adverse impacts should be considered, taking into account available scientific information, and traditional, fisher or community knowledge provided that its validity can be objectively verified.</p>	
Conclusion		References
<p>Essential habitat aspects are addressed in the IRFM Standard under clause 3.2.3.1 "If studies show that the spawning or nursery areas or other essential habitats in the fishing area are at risk and highly vulnerable to negative impacts of particular fishing gear, such impacts shall be limited in range relative to the full spatial range of the habitat or else action is taken to avoid, minimize or mitigate such impacts".</p> <p>In relation to enhancement activities, enhanced fisheries are not covered under the scope of the IRFM Standard (p. 4, footnote 2).</p>		<p><a href="#"><u>2nd Surveillance Assessment Report Icelandic Ling Commercial Fisheries</u></a></p> <ul style="list-style-type: none"> <li>• Pages 54-60 and 80-83.</li> </ul>

## D . 4 E V I D E N C E O F A L I G N M E N T

### D.4.08

The MRI and Icelandic fisheries management has analyzed habitats essential for spawning and vulnerable habitats, which have also been mapped. Icelandic fisheries management enacts regulation to protect that essential habitat (for spawning) and habitat highly vulnerable to the effects of fishing, like deep water corals and hydrothermal vents, through temporal or full time closures.

An example of this can be found in the 2nd Surveillance Assessment Report (2021) for the Icelandic Ling Commercial Fishery on pages 54-60 and 80-83.

# D . 4 E V I D E N C E O F A L I G N M E N T

D.4.09		
GSSI Component	Guidance	
The standard requires that data and information on the role of the stock under consideration in the food-web are assessed to determine whether it is a key prey species in the ecosystem, and if so whether fishing on that stock might result in severe adverse impacts on dependent predators.	The purpose of assessing the data and information is to provide adequate knowledge of the role of the stock under consideration in the food-web. Adequate knowledge means there is enough understanding of the role of the stock under consideration in the food-web to determine whether it is a key prey species and, if so, whether fishing on that stock under consideration might result in severe adverse impacts on dependent predators.	
Conclusion	References	
<p>The IRFM Standard addresses this concern via clause 3.2.4.1 "Food web considerations - If the stock under consideration is a key prey species in the ecosystem, the harvesting policy and management measures shall be directed to avoid severe adverse impacts on dependent predators" (p.21).</p> <p>Although not explicitly requiring the data and information is assessed, it is implied by IRFM through clause 1.2.1 "A competent research institute or arrangement shall collect and/or compile the necessary data and carry out scientific research and assessment to the state of fish stocks and the condition of the ecosystem. (...)" (p. 12). on which harvesting policy and management measures are based. The 'condition of the ecosystem' covers food-web interactions and impacts.</p> <p>The 2nd Surveillance Assessment Report (2021) for the Icelandic Golden Redfish Commercial Fishery demonstrates this on pages 62-63 and 84-85</p>	<ul style="list-style-type: none"> <li>• <a href="#"><u>Form 9h IRFM Golden redfish 2nd Surveillance Report</u></a></li> <li>• 'Foodweb considerations' pages 62-63 and 84-85</li> </ul>	

# D . 4 E V I D E N C E O F A L I G N M E N T

D.4.10	
GSSI Component	Guidance
<p>The standard requires an assessment of the impacts of the unit of certification, including any associated enhancement activities where applicable, on endangered species.</p>	<p>This is the partner Essential Component of D.3.04 that requires the collection and maintenance of adequate, reliable and current data and/or other information about the effects of the unit of certification, including any enhancement activities, on endangered species. Under this Essential Component the standard must require an assessment of the impacts of the unit of certification on these species. The component relating to enhancement activity may be "not applicable" to schemes that explicitly do not cover enhanced fisheries. The results of the assessment should provide sufficient understanding of the relevant endangered species and fishery impacts on them to enable their protection from those impacts; i.e. for the management objective with respect to endangered species (D.2.05) to be achieved.</p> <p>The achievement of this Essential Component should be considered alongside D.3.04 and D.6.06. In particular, the FAO Guidelines acknowledge the importance of a "risk assessment/risk management approach" to address the issue of greater scientific uncertainty associated with ecosystem impacts; also that the most probable adverse impacts should be considered, taking into account available scientific information, and traditional, fisher or community knowledge provided that its validity can be objectively verified.</p>
Conclusion	References
<p>The IRFM Standard addresses requirement of assessing impact of the unit of certification on endangered species in clauses:</p> <p>3.1.1 "Adverse impacts of the fishery on the ecosystem shall be considered and appropriately assessed and effectively addressed, consistent with the precautionary approach" (p. 20);</p> <p>3.1.2, "Those impacts that are likely to have serious consequences shall be addressed. This may take the form of an immediate management response or further analysis of the identified risk" (p. 20);</p> <p>3.2.1.2 "Information shall be available on the potential effect of fishing on endangered, threatened and protected species, as appropriate and relevant in the context of the unit of certification" (p. 20);</p>	<ul style="list-style-type: none"> <li>• <a href="#"><u>Icelandic Tusk Commercial Fishery 2nd Surveillance Report 2021</u></a></li> <li>• Pages 44-48 and 73-75</li> </ul>

# D . 4 E V I D E N C E O F A L I G N M E N T

## D.4.10

3.2.2.4 "Suitable steps shall be considered to avoid, minimize or mitigate encounters with endangered, threatened and protected species, as appropriate and relevant in the context of the unit of certification" (p. 21).

In relation to enhancement activities, enhanced fisheries are not covered under the scope of the IRFM Standard (p. 4, footnote 2).

An example of assessing impacts on endangered species can be found in the 2nd Surveillance Assessment Report (2021) for the Icelandic Tusk Commercial Fishery on pages 44-48 and pages 73-75.

# D . 4 E V I D E N C E O F A L I G N M E N T

D.4.11	
GSSI Component	Guidance
The standard does not preclude small scale fisheries from possible certification for ecolabelling due to the use of less elaborate methods of stock assessment.	This Essential Component derives from paragraph 32 of the Marine Ecolabelling Guidelines. Specifically, that paragraph deals with the ways in which certification standards address the use of less elaborate methods of stock assessment in small scale fisheries, noting that with higher uncertainty more precautionary approaches to managing fisheries on such resources will be required which may necessitate lower levels of utilization of the resource.
Conclusion	References
<p>The method of stock assessment in Iceland includes all fisheries and catch data from small scale fisheries is also reported in the Official Central Database and is included in the data by the MRI and ICES to used to conduct stock assessments.</p> <p>There is no distinction in the IRFM Standard between small-scale fisheries and all other fisheries. The Fishery Management organization was first founded by the Small Boat Owners Association and Fisheries Iceland - previously known as Fisheries Association of Iceland and are part of the Fishery clients of all current Icelandic certified fisheries.</p> <p>In context, small scale vessels which form part of of Icelandic fisheries are included in certification for all current certified fisheries. For example p13 of the Icelandic ling Full Assessment Report identifies The National Association of Small Boat Owners, Iceland (NASBO) as one of the applicants.</p>	<p><a href="#"><u>IRFM Standard revision 2.1</u></a>  <a href="#"><u>2nd Surveillance Assessment Report Icelandic Ling</u></a>  <a href="#"><u>Commercial Fisheries</u></a></p>



## D.5 EVIDENCE OF ALIGNMENT

D.5.01	
GSSI Component	Guidance
<p>The standard requires that management measures for the stock under consideration consider the impacts on the stock under consideration of all the fisheries utilizing that stock under consideration over its entire area of distribution.</p>	<p>This Essential Component addresses cumulative impacts of fishing mortality from all sources on the stock under consideration as specified in the Ecolabelling Guidelines. Management measures for the stock under consideration must be based on an assessment of that stock which takes account of all removals from the stock over its entire area of distribution, i.e. not just by the unit of certification but by all fisheries that utilize that stock and all other sources of fishing mortality, including (but not limited to) bycatch, discards, unobserved mortality, incidental mortality, unreported catches, recreational fisheries, catches taken for research purposes and catches taken outside of the unit of certification. These terms are not defined here, or in the Glossary. They are used collectively in this context to cover all possible descriptions of fishery removals of the stock under consideration.</p> <p>Area of Distribution is described in the Glossary based on a CITES reference for species, but this can apply to stocks in a fisheries context.</p>
Conclusion	References
<p>The IRFM Standard defines under 'Stock under Consideration' that "In assessing compliance with this Standard, the impacts on the stock under consideration of all the fisheries utilizing that stock under consideration over its entire area of distribution are to be considered". (p. 9)</p> <p>It is further covered by the following clauses:                      1.2.4 "For the stock under consideration, the determination of suitable conservation and management measures shall include or take account of total fishing mortality from all sources in assessing the state of the stock under consideration, including:                      1.2.4.1 Estimates of discards.</p>	<p><a href="#"><u>IRFM Standard revision 2.1</u></a></p>

# D . 5 E V I D E N C E O F A L I G N M E N T

## D.5.01

1.2.4.2 Unobserved and incidental mortality,  
 1.2.4.3 Unreported catches and catches in other fisheries" (p. 12)  
 1.5.3 "Decisions on TAC shall be taken by the competent fisheries management authority taking into consideration the entire distribution range of the stock under consideration, as appropriate" (p. 15); and  
 1.5.4 "For Shared Stocks the setting of TAC shall take into consideration international agreements and scientific advice" (p.15)

## D.5.02

### GSSI Component

The standard requires that management measures specify the actions to be taken in the event that the status of the stock under consideration drops below levels consistent with achieving management objectives, that allow for the restoration of the stock to such levels within a reasonable time frame. This requirement also pertains to species introductions or translocations that have occurred historically and which have become established as part of the natural ecosystem.

### Guidance

This requires the specification in advance of decision rules that mandate remedial management actions to be taken if target reference points are exceeded and/or limit reference points are approached or exceeded or the desired directions in key indicators of stock status are not achieved. For example, decreasing fishing mortality (or its proxy) if the stock size approaches its limit reference point. This is a central component of the Precautionary Approach (see D.1.06).

### Conclusion

The IRFM Standard states under clause 1.1.9.2 in relation to the Fishery Management Plan that "Limits with respect to precautionary management, including the limit reference point for stock size or its proxy and the limit reference point for fishing mortality or its proxy (e.g. harvest as a proportion of stock size, etc.), as well as remedial action to be taken if limits are approached or exceeded" (p. 11).

### References

[IRFM Standard revision 2.1](#)

# D . 5 E V I D E N C E O F A L I G N M E N T

## D.5.02

In addition, 1.3.1.4 (p. 13) and 1.3.2.2.4 (p. 14) further stipulate respectively that "Appropriate reference points shall be determined and remedial actions to be taken if reference points are approached or exceeded shall be specified" and "Should the estimated stock size approach Blim (or its proxy), then appropriate management action shall be taken with the objective of restoring stock size to levels above Blim (or its proxy) with high probability within a reasonable time frame".

## D.5.03

GSSI Component	Guidance
The standard requires, in the case of enhanced fisheries, management measures designed to achieve management objectives (see D.2.05) seeking to avoid significant negative impacts of enhancement activities on the natural reproductive stock components of the stock under	<p>This Essential Component addresses the need for standards to require management measures to achieve the management objectives in Essential Component D.2.05. It refers to Enhanced Fisheries, hence it may be regarded as not applicable if the Scheme/Standard explicitly excludes enhanced fisheries (see also Guidance for D.2.05) The term natural reproductive stock components is explained in the Glossary. The term "significant negative impacts" is used in the Inland Guidelines. This was not intended to be equivalent to severe adverse impacts (on dependent predators). The consultation that resulted in the drafting of the Inland Guidelines considered that avoidance of "severe adverse impacts" only would not be consistent with a management obligation to manage enhancement in ways that would not impact the productivity and abundance of the natural reproductive stock component of the stock under consideration.</p> <p>In the case where organisms for stocking originate from wild stocks other than the stock under consideration, those stocks should be managed according to the provisions of Article 7 of the CCRF. In particular, those stocks should be within biologically based limits , or if outside those limits, the removal of organisms for stocking purposes does not hinder recovery and rebuilding of those stocks</p>

# D . 5 E V I D E N C E O F A L I G N M E N T

## D.5.03

consideration and any other wild stocks from which the organisms for stocking are being removed.

Standards that apply to enhanced components of the stock under consideration require that stocking of enhanced fisheries, whether sourced from aquaculture facilities or wild stocks, is undertaken in such a way as to maintain inter alia:

- i) The integrity of the environment;
- ii) The conservation of genetic diversity;
- iii) Disease control; and
- iv) Quality of stocking material
- v) The donor wild stocks

### Conclusion

Enhanced fisheries are not covered under the scope of the IRFM Standard (p. 4, footnote 2).

### References

[IRFM Standard revision 2.1](#)

# D . 5 E V I D E N C E O F A L I G N M E N T

D.5.04		
GSSI Component	Guidance	
The standard requires that management measures are designed to achieve management objectives (see D.2.04) seeking to ensure that catches and discards by the unit of certification of stocks other than the stock under consideration and any associated culture and enhancement activity do not threaten those stocks with recruitment overfishing or other impacts that are likely to be irreversible or very slowly reversible.	This is the partner Essential Component of D.2.04. Non-target catches and discards refers to species/stocks that are taken by the unit of certification other than the stock for which certification is being sought (see Glossary). Examples of irreversible or very slowly reversible effects on bycatch species include recruitment overfishing or excessive depletion of very long-lived organisms. Management measures should mitigate effects that are likely to be irreversible or very slowly reversible by making those effects less severe such that they are no longer likely to be irreversible or very slowly reversible.	
Conclusion	References	
<p>Clause 3.2.2.3 of the IRFM Standard requires that "Non-target catches, including discards, of stocks other than the "stock under consideration" should not threaten these non-target stocks with serious risk of extinction; if serious risks of extinction arise, effective remedial action should be taken".</p> <p>In relation to enhancement activities, enhanced fisheries are not covered under the scope of the IRFM Standard (p. 4, footnote 2).</p>	<p><a href="#"><u>IRFM Standard revision 2.1</u></a></p>	

D.5.04.01		
GSSI Component	Guidance	
Where species subject to bycatch and/or discarding in the Unit of Certification are taken in both areas under national jurisdiction and adjacent areas beyond national jurisdiction, the standard requires that states	This is addressing the specific case where bycatch and/or discarding in the Unit of Certification is occurring in both areas under national jurisdiction and adjacent areas beyond national jurisdiction. In this case, the standard must require that the relevant management authorities (i.e. the coastal state or states and RFMO/As) collaborate in	

# D . 5 E V I D E N C E O F A L I G N M E N T

## D.5.04.01

and RFMOs/As collaborate in assessing bycatch and discard issues throughout the entire range of the bycatch species of concern where applicable.

assessing bycatch and discard issues throughout the entire distribution range of the species of concern where applicable.

### Conclusion

The IRFM Standard requires collaboration under 1.5.9 that "The competent fisheries management authorities shall cooperate and actively participate in competent Regional Fisheries Management Organisation(s) (RFMOs) or arrangement(s), relevant to the stock under consideration and management agreements reached shall be implement by fisheries authority and effectively and uniformly executed" (p. 15). By-catch and discarding are addressed: 3.2.2.3 "Non-target catches, including discards, of stocks other than the "stock under consideration" should not threaten these non-target stocks with serious risk of extinction; if serious risks of extinction arise, effective remedial action should be taken" (p. 20)

### References

[IRFM Standard revision 2.1](#)

# D . 5 E V I D E N C E O F A L I G N M E N T

D.5.04.02	
GSSI Component	Guidance
<p>The Standard requires a review of the effectiveness of existing initiatives that address bycatch and discard problems in ensuring that non-target stocks (i.e. stocks/species in the catch that are other than the stock under consideration) are not threatened with recruitment overfishing or other impacts that are likely to be irreversible or very slowly reversible.</p>	<p>The bycatch and discard problems referred to in this Supplementary Component would be identified through a risk assessment to identify the specific nature and extent of bycatch and discard problems in the fishery as a basis for prioritization and planning. This could be undertaken, for example, as part of the analysis of the effects of the unit of certification, including any enhancement activities, on ecosystem structure, processes and function, as per Essential Component D.4.07. The existing initiatives that address the bycatch and discard problems would include the management measures designed to achieve management objectives (see D.2.04) referred to in the parent Essential Component D.5.04.</p>
Conclusion	References
<p>Under the IRFM Standard, discarding is prohibited (3.2.2.1, p. 20). Review of effectiveness of existing initiatives that address bycatch and discard problems as per the component requirement, in line with achieving management measures outlined under D504, are covered by the IRFM Standard in clause 2.3.2.7 that specifies that "Discarding of catch from stock under consideration shall be prohibited. Discarding that may occur shall be monitored, e.g. by estimating amount of catch discarded due to size based high grading by species, season, gear type and area as feasible. The method for the monitoring of discards shall be specified" (p. 17)</p> <p>The assessment report of Icelandic ling, 2019 provides evidence that describes how the management system responds to information gaps concerning by catch of non commercial species and marine mammals. P142-145 referring to clause 3.2.2.1 and 3.2.2.2: The evidence refers to the reliability of logbook data concerning the interactions and bycatch of marine mammals and seabirds.</p>	<p><u><a href="#">IRFM Standard revision 2.1 Icelandic Ling Assessment report 2019</a></u></p> <ul style="list-style-type: none"> <li>▪ P142-145 referring to clause 3.2.2.1 and 3.2.2.2</li> <li>▪ P145-146 referring to clause 3.2.2.1</li> <li>▪ And p146 referring to clause 3.2.2.3 and 3.1.1</li> <li>▪ Summary evidence: p113-121</li> </ul>

## D.5.04.02

Understanding of the by-catch of non-commercial species and marine mammals and seabirds is limited as there hasn't been systematic recording and there are concerns about the reliability of logbook and observer records. Measures have been put in place to improve recording by observers but there are still significant differences between logbook and observer records. This disparity has been observed in the lumpsucker gillnet fishery but it is not clear how representative this is of other Icelandic fisheries. Further work is being undertaken in this area particularly in relation to the higher risk gillnet fisheries through the Committee for Consultation on Responsible Management of Living Marine Resources. Vulnerable species that the fishery may interact with include grey skate, Atlantic halibut, spurdog, basking shark, Greenland shark and porbeagle. The stock status of these species is unknown or at low levels but Icelandic landings are also low. Measures are in place to reduce catches of the protected species Atlantic halibut, spurdog, porbeagle and basking shark as mentioned previously. P145-146 referring to clause 3.2.2.1

And p146 referring to clause 3.2.2.3:

**3.1.1 Adverse impacts of the fishery on the ecosystem shall be considered and appropriately assessed and effectively addressed,20 consistent with the precautionary approach.**

Summary evidence: p113-121

The available evidence indicates that the adverse impacts of the fishery on the ecosystem are considered, assessed and appropriately addressed in a manner consistent with the precautionary approach as required by the IRFF Standard. Further evidence of reliable data collection from the improved observer programme and the electronic logbook reporting system would increase confidence that there are no adverse impacts on vulnerable species, marine mammals and seabirds. By-catch rates of harbour porpoise should be kept under review and assessed in light of updated stock assessments as they come available. Further action may be required if rates remain high.



# D . 5 E V I D E N C E O F A L I G N M E N T

D.5.04.05		
GSSI Component	Guidance	
The standard requires that management measures are designed to achieve management objectives (see D.2.04.02) seeking to ensure that non-certified stocks (i.e. stocks/species in the catch that are other than the stock under consideration) are not threatened with recruitment overfishing or other impacts that are likely to be irreversible or very slowly reversible.	This Supplementary Component requires that management measures for non-target species (i.e. stocks/species in the catch that are other than the stock under consideration) consider the impacts of all fishing on those stocks/species of all activities that might give rise to recruitment overfishing or other impacts that are likely to be irreversible or very slowly reversible over their entire areas of distribution.	
Conclusion		References
<p>Following the information provided in D504 and D50402, in relation to management measures being designed to achieve management objectives, this is again addressed by the IRFM Standard by the following:</p> <p>3.2.2.3 "Non-target catches, including discards, of stocks other than the "stock under consideration" should not threaten these non-target stocks with serious risk of extinction; if serious risks of extinction arise, effective remedial action should be taken."</p> <p>This is further substantiated, in order to achieve the management objectives, through measures like:</p> <p>2.3.2.8 "Vessels must comply with relevant National Fishery Management measures, which may include; TAC and quota allocations, effort management measures (e.g. days at sea, access limitation, gear restrictions, maximum allowable proportion of undersized fish, closure of areas with a high proportion of fish recruiting to the fishery, etc.), and technical conservation measures (e.g. mesh size and other gear selectivity measures)" (p. 17);</p> <p>2.3.2.4 "Catch amounts by species and fishing area shall be estimated and continually recorded in fishing logbooks on-board the fishing vessels" (p. 17);</p> <p>2.3.2.5 "Fishing logbooks shall be subject to unannounced inspection" (p. 17);</p> <p>2.3.2.6 "The timely and correct recording of catches in fishing logbooks shall be monitored by comparing the recorded catch amounts with the catch stored aboard the vessel at time of inspection" (p. 17).</p>		<p><a href="#"><u>IRFM Standard revision 2.1</u></a></p>

# D . 5 E V I D E N C E O F A L I G N M E N T

## D.5.04.05

Through these broad measures, the IRFM Standard requires to achieve management objectives that minimize impacts on non-target stocks that would result in serious risk of extinction.

# D . 5 E V I D E N C E O F A L I G N M E N T

D.5.04.06	
GSSI Component	Guidance
<p>The standard requires the management system to consider, as part of a fisheries management plan, the establishment of no-discard regimes, wherever applicable, and individual and fleet-wide limits on bycatch in those fisheries where bycatch is unavoidable. When setting a quota for a species that can be taken both as a target as well as a bycatch in various fisheries, it is necessary to ensure that quotas for the species as targeted catch and as bycatch are accounted for within an overall limit. Where information on the bycatch populations is limited, bycatch limits and quotas should be set in accordance with the precautionary approach.</p>	<p>This Supplementary Component refers to several specific bycatch management and discard reduction measures that the standard would need the fishery to consider.</p>
Conclusion	References
<p>The IRFM Standard addressed this through several clauses under section 2.3.2 "Fishing vessel monitoring and control systems" that describe requirements, namely having discards prohibited, and methods of how this is monitored for Icelandic fisheries involved in certification.</p> <p>2.3.2.7 "Discarding of catch from stock under consideration shall be prohibited. Discarding that may occur shall be monitored, e.g. by estimating amount of catch discarded due to size based high grading by species, season, gear type and area as feasible. The method for the monitoring of discards shall be specified" (p. 17);</p> <p>2.3.2.8 "Vessels must comply with relevant National Fishery Management measures, which may include; TAC and quota allocations, effort management measures (e.g. days at sea, access limitation, gear restrictions, maximum allowable proportion of undersized fish, closure of areas with a high proportion of fish recruiting to the fishery, etc.), and technical conservation measures (e.g. mesh size and other gear selectivity measures) (p. 17);</p> <p>2.3.2.9 "Monitoring and control measures shall be in place and shall be conducted in a manner to encourage and demonstrate compliance (and deter unreported landings)" (p. 18);</p> <p>2.3.2.10 "Catches shall be landed in authorized fishing ports. Authorized fishing ports provide the necessary facilities for handling and weighing of the catch" (p. 18);</p>	<p><a href="#"><u>IRFM Standard revision 2.1</u></a></p>

# D . 5 E V I D E N C E O F A L I G N M E N T

## D.5.04.06

- 2.3.2.11 "In cases of mixed species catches, all commercial species shall be landed" (p. 18);
- 2.3.2.12 "Landings shall be monitored. Harbor officials and fisheries inspectors shall monitor the correct weighing and registration of the catch" (p. 18);
- 2.3.2.13 "Catch shall be weighed by species at landing" (p. 18);
- 2.3.2.14 "The weight (whole weight or gutted weight) by species of all catches of "stock under consideration" and by-catch species shall be measured by authorized harbor officials at landing and recorded in the official central database (date, vessel, gear type, location, species, quantity)" (p. 18);
- 2.3.2.15 "There is systematic monitoring of landing, weighing and registration of catches and discrepancies/deviations shall be recorded" (p. 18); and
- 2.3.2.16 "Reasons for deviations shall be analyzed and corrections made to reduce the likelihood of recurrence" (p. 18).

# D . 5 E V I D E N C E O F A L I G N M E N T

D.5.05	
GSSI Component	Guidance
The standard requires the existence of management measures that minimize unwanted catch and discards, where appropriate, and reduce post-released mortality where incidental catch is unavoidable.	<p>This Essential Component is related to D.5.04 in that minimizing unwanted catch and discards and reducing post-released mortality can help to reduce the impact of non-certified catches and discards by the unit of certification. Under the CCRF, users of aquatic ecosystems should minimize waste and catch of non-target species, both fish and non-fish species. Non-certified catches and discards refers to species/stocks that are taken by the unit of certification other than the stock for which certification is being sought (see Glossary).</p> <p>The words “where appropriate” give a scheme the flexibility not to require a fishery to have bycatch avoidance if there is no risk of bycatch in the fishery.</p>
Conclusion	References
<p>Under the IRFM Standard discarding is prohibited:</p> <p>2.3.2.7 " Discarding of catch from stock under consideration shall be prohibited. Discarding that may occur shall be monitored, e.g. by estimating amount of catch discarded due to size based high grading by species, season, gear type and area as feasible. The method for the monitoring of discards shall be specified" (p. 17); and</p> <p>3.2.2.1 "Discarding, including discarding of catchers from non-target commercial stocks, is prohibited" (p. 20).</p> <p>The IRFM Standard further discourages the practice of discarding through 2.3.3.2 "limited allowance may be made for the use of quota for one species to count against landings of another species, with the objective of providing the necessary minimum flexibility and discouraging discards" (p. 18).</p>	<p><a href="#"><u>IRFM Standard revision 2.1</u></a></p>

D.5.05.01	
GSSI Component	Guidance

# D . 5 E V I D E N C E O F A L I G N M E N T

## D.5.05.01

The standard requires that management measures incorporate best practices for bycatch management and reduction of discards.

The FAO International Guidelines on Bycatch Management and Reduction of Discards, paragraph 4.1.4 sets out best practices for bycatch management and reduction of discards. These best practices are required, where applicable, to meet this Supplementary Component.

See also Responsible fish utilization. FAO Technical Guidelines for Responsible Fisheries. No. 7. Rome, FAO. 1998. 33p 108, 112

### Conclusion

The IRFM Standard has been developed in line with best practice as described by FAO Eco-labeling Guidelines.

Clauses 2.3.2.7 and 2.3.2.2 of the IRFM Standard prescribe respectively "Discarding of catch from stock under consideration shall be prohibited as well as discarding of catches from non-targeted commercial stocks. Discarding that may occur shall be monitored, e.g. by estimating amount of catch discarded due to size based high grading by species, season, gear type and area as feasible. The method for the monitoring of discards shall be specified" and "The fishing gear shall be subject to inspection, as well as the composition of the catch and its handling onboard the fishing vessel" (both p. 17).

The species that can be discarded are reduced to a very small quantity of non- fishery species, damaged fish and non commercial species.

In practice, the amount of discards is very low, as evidenced in the certification reports. For example 2nd Surveillance Assessment Report Icelandic Ling Commercial Fishery, p. 20, indicating "Studies by MRI indicate that discards of ling (and of tusk) are very small (<1% by number, <0.5% by weight"

### References

[2nd Surveillance Assessment Report Icelandic Ling Commercial Fisheries](#)

- Page 20

# D . 5 E V I D E N C E O F A L I G N M E N T

## D.5.05.01

In relation to best practice, discards are discouraged through clauses like 2.3.3.2 "Limited allowance may be made for the use of quota for one species to count against landings of another species, with the objective of providing the necessary minimum flexibility and discouraging discards".

# D . 5 E V I D E N C E O F A L I G N M E N T

D.5.05.02	
GSSI Component	Guidance
The standard requires that regulatory measures do not provide incentives which may undermine bycatch management and discard reduction measures.	Regulatory measures that undermine bycatch management and discard reduction measures might be, for example, those that reduce the level of uptake, or otherwise create an incentive to discard.
Conclusion	References
<p>The IRFM Standard prohibits discarding (clauses 2.3.2.7 p.17 and 3.2.2.1 p. 20), and provides measures that discourage discarding and offer incentives to follow the prohibition. An example of this is the ability to transfer catch quota.</p> <p>IRFM clauses that relate to this are:</p> <p>2.2.1 "Concordance between the Total Allowable Catch (TAC) and actual total catch from stock under consideration shall be ensured through control, enforcement, documentation, correction and verification".</p> <p>Associated with this clause, is footnote 17 that specifies "For long-lived species, this can include flexibility provisions such as legal allowance and adjustment for limited transfer of vessel quotas between adjacent management periods (years) as well as provisions providing incentives against discards".</p> <p>Section 2.3.2 "Fishing vessel monitoring and control systems" which includes 2.3.2.8 "Vessels must comply with relevant national fishery management measures, which may include; TAC and quota allocations, effort management measures (e.g. days at sea, access limitation, gear restrictions, maximum allowable proportion of undersized fish, closure of areas with a high proportion of fish recruiting to the fishery, etc.), and technical conservation measures (e.g. mesh size and other gear selectivity measures)" (p. 17);</p>	<p><a href="#"><u>IRFM Standard revision 2.1</u></a></p>



# D . 5 E V I D E N C E O F A L I G N M E N T

## D.5.05.02

2.3.2.9 "Monitoring and control measures shall be in place and shall be conducted in a manner to encourage and demonstrate compliance (and deter unreported landings)" (p. 18)

And Section 2.3.3 "Catches are subtracted from relevant quotas", specifically, 2.3.3.2 "Limited allowance may be made for the use of quota for one species to count against landings of another species, with the objective of providing the necessary minimum flexibility and discouraging discards" (p. 18).

# D . 5 E V I D E N C E O F A L I G N M E N T

D.5.05.03		
GSSI Component	Guidance	
The standard requires the adoption of measures to minimize mortalities as a result of pre-catch losses and ghost fishing.	Examples of measures to minimize mortalities as a result of pre-catch losses and ghost fishing include gear modifications that enable undersized fish and/or non-target species to escape the fishing gear unharmed and measures to reduce gear loss, or ensure that lost gear does not continue to result in mortality.	
Conclusion	References	
<p>The IRFM Standard requires through the following clauses, measures to address pre-catch losses and ghost fishing:</p> <p>3.2.2.5 "Appropriate steps shall be taken to avoid the loss of fishing gear and ghost fishing effects of lost and abandoned gear" (p. 21);</p> <p>2.3.2.8 "Vessels must comply with relevant National Fishery Management measures, which may include; TAC and quota allocations, effort management measures (e.g. days at sea, access limitation, gear restrictions, maximum allowable proportion of undersized fish, closure of areas with a high proportion of fish recruiting to the fishery, etc.), and technical conservation measures (e.g. mesh size and other gear selectivity measures) (p. 17)" and;</p> <p>1.3.2.3.3 "Consideration shall be given to relevant measures designed to limit fishing mortality of juvenile fish, with the objective to protect juveniles, to reduce the likelihood of growth overfishing and increasing the contribution of year classes to the spawning stock of the stock under consideration (p. 14)";</p> <p>There is also a provision for passive gear to be identifiable.</p> <p>2.3.2.17 "In cases of passive fishing gear left unattended at sea, there shall be regulation that requires fishing gear to be marked so that the owner can be identified, where relevant" (p. 18).</p>	<p><a href="#"><u>IRFM Standard revision 2.1</u></a></p>	

# D . 5 E V I D E N C E O F A L I G N M E N T

D.5.06		
GSSI Component	Guidance	
<p>The standard requires the existence of management measures, as necessary, designed to achieve the management objectives (D.2.06) that seek to ensure that endangered species are protected from adverse impacts resulting from interactions with the unit of certification and any associated culture or enhancement activity, including recruitment overfishing or other impacts that are likely to be irreversible or very slowly reversible.</p>	<p>The context of this Essential Component is Endangered Species. Endangered species are defined in the Glossary. These species are already adversely impacted at the population level, by definition, and are susceptible to further adverse impacts at this level from which they need to be protected. Where "adverse impacts" is used in relation to Endangered Species in the FAO Guidelines there is no further qualification provided (i.e. no "significant" or "severe"). Elsewhere in the Guidelines, the term "adverse impacts" is qualified, but in each case this is in a very specific context. For example, the term "significant negative impacts" is used in the FAO Ecolabelling Guidelines only in relation to enhanced fisheries and "severe adverse impacts" is used only in relation to dependent predators. The term "significant adverse impacts" occurs only in the Deep Sea Guidelines with respect to VMEs.</p> <p>The FAO Guidelines acknowledge that much greater scientific uncertainty is to be expected in assessing possible adverse ecosystem impacts of fisheries than in assessing the state of target stocks (paragraph 31 (41)), hence the management measures to meet the objectives to protect endangered species should take into account risk and uncertainty.</p>	
Conclusion	References	
<p>The existence of management measures to ensure endangered species are protected are required by the IRFM Standard through the following clauses:</p> <p>3.1.1 "Adverse impacts of the fishery on the ecosystem shall be considered and appropriately assessed and effectively addressed, consistent with the precautionary approach" (p. 20);</p> <p>3.1.2 "Those impacts that are likely to have serious consequences shall be addressed. This may take the form of an immediate management response or further analysis of the identified risk" (p. 20);</p> <p>3.2.1.2 "Information shall be available on the potential effect of fishing on endangered, threatened and protected species, as appropriate and relevant in the context of the unit of certification" (p. 20);</p>	<ul style="list-style-type: none"> <li>• <a href="#"><u>2nd Surveillance Assessment Report (2021) Icelandic Cod Commercial Fishery</u></a></li> <li>• NC 2 clause 3.1.1: pages 46 - 48 and 94 -104</li> </ul>	

# D . 5 E V I D E N C E O F A L I G N M E N T

## D.5.06

3.2.2.4 "Suitable steps shall be considered to avoid, minimize or mitigate encounters with endangered, threatened and protected species, as appropriate and relevant in the context of the unit of certification" (p. 21); and

3.2.2.3 "Non-target catches, including discards, of stocks other than the "stock under consideration" should not threaten these non-target stocks with serious risk of extinction; if serious risks of extinction arise, effective remedial action should be taken" (p. 20).

In relation to enhancement activities, enhanced fisheries are not covered under the scope of the IRFM Standard (p. 4, footnote 2).

In the 2nd Surveillance Assessment Report (2021) for the Icelandic Cod Commercial Fishery, for example a non-conformance was raised and continues to be monitored in to relation to IRFM Standard clause 3.1.1. "There is insufficient evidence that adverse impacts of the cod fishery on the following ecosystem components: 1) Spotted wolffish, and; 2) Common loon, are being considered and appropriately assessed and affectively addressed, consistent with the precautionary approach" (p. 46 - 48 and p. 94 -104) demonstrating effective alignment with the GSSI Essential Component.

# D . 5 E V I D E N C E O F A L I G N M E N T

D.5.06.01		
GSSI Component	Guidance	
The standard requires the existence of management measures, where appropriate, to reduce interactions with particularly vulnerable bycatch (e.g. juveniles and rare, endangered, threatened or protected species) through identifying and establishing areas where the use of all or certain gears is limited or prohibited, based on the best scientific evidence available and consistent with international law.	To meet this Supplementary Component, the standard must require management measures, where necessary, to reduce interactions with particularly vulnerable bycatch. The Supplementary Component provides examples of categories of bycatch that are particularly vulnerable. The measures envisaged are areas where use of certain gears is limited or prohibited. Endangered and threatened are described in the Glossary. "Protected" refers generally to any plant or animal that a government declares by law to warrant protection; most protected species are considered either threatened or endangered. A species that is recognized by national legislation, affording it legal protection due to its population decline in the wild. The decline could be as a result of human or other causes.	
Conclusion	References	
<p>The IRFM Standard covers management measure for reducing interactions with vulnerable bycatch through the following clause:</p> <p>3.2.3.1 "If studies show that the spawning or nursery areas or other essential habitats in the fishing area are at risk and highly vulnerable to negative impacts of particular fishing gear, such impacts shall be limited in range relative to the full spatial range of the habitat or else action is taken to avoid, minimize or mitigate such impacts" (p. 20)</p>	<p><a href="#"><u>IRFM Standard revision 2.1</u></a></p>	

D.5.07		
GSSI Component	Guidance	

# D . 5 E V I D E N C E O F A L I G N M E N T

## D.5.07

The standard requires the existence of management measures, as necessary, designed to achieve the management objectives (D.2.06) seeking to avoid, minimize or mitigate impacts of the unit of certification on essential habitats for the “stock under consideration” and on habitats that are highly vulnerable to damage by the fishing gear of the unit of certification. In assessing fishery impacts, the Standard requires consideration of the full spatial range of the relevant habitat, not just that part of the spatial range that is potentially affected by fishing.

Essential habitats are described in the Glossary. There is no reason to regard them as being significantly different from the “critical fisheries habitats in marine and fresh water ecosystems” referred to in the CCRF (Article 6.8), which include wetlands, mangroves, reefs, lagoons, nursery and spawning areas. Examples of impacts on habitat that should be avoided include those listed in this paragraph: destruction, degradation, pollution and other significant impacts. The purpose of the requirement to consider the full spatial range of the relevant habitat in assessing fishery impacts may be to consider both the degree to which the habitat is rare, or common, and also that there may be impacts on the same habitat in other parts of its spatial range.

### Conclusion

The IRFM Standard prescribes in 3.2.3.1 “If studies show that the spawning or nursery areas or other essential habitats in the fishing area are at risk and highly vulnerable to negative impacts of particular fishing gear, such impacts shall be limited in range relative to the full spatial range of the habitat or else action is taken to avoid, minimize or mitigate such impacts” (p. 21).

Examples of management measures being implemented can be found in the certification reports under the Habitat sections. For example: 2nd Surveillance Assessment Report (2021) Icelandic Ling Commercial Fishery, pages 54–60 and 80–83

### References

[2nd Surveillance Assessment Report Icelandic Ling Commercial Fisheries](#)

- Habitat sections: pages 54–60 and 80–83

# D . 5 E V I D E N C E O F A L I G N M E N T

D.5.08	
GSSI Component	Guidance
<p>The standard requires the existence of management measures, as necessary, designed to meet the objectives (D.2.07) that seek to avoid severe adverse impacts on dependent predators resulting from fishing on a stock under consideration that is a key prey species.</p>	<p>This is the partner Essential Component of D.2.07. Where the stock under consideration is a key prey species, the standard must require that fishing mortality on that species/stock is managed so as not to result in severe adverse impacts on Dependent Predators. The FAO Guidelines require that all sources of fishing mortality on the stock under consideration are taken into account (whether or not it is a prey species) in assessing the state of the stock under consideration, including discards, unobserved mortality, incidental mortality, unreported catches and catches in other fisheries. Severe adverse impacts are mentioned in the Essential Components only in relation to dependent predators. This is in line with the Ecolabelling Guidelines. The severity of adverse impacts is related to their potential reversibility. Severe adverse impacts can be regarded as those that are likely to be irreversible or very slowly reversible, which is described in the Glossary.</p>
Conclusion	References
<p>The existence of management measures in relation to food web and prey-predator interactions are required by the IRFM through the following clauses:</p> <p>3.2.4.1 "Food web considerations – If the stock under consideration is a key prey species in the ecosystem, the harvesting policy and management measures shall be directed to avoid severe adverse impacts on dependent predators" (p. 21); and</p> <p>3.2.5.1 "Management plans shall be developed and implemented in a timely fashion for avoiding, minimizing or mitigating any ecosystem issues properly identified, based on risk analysis and scientific advice, consistent with the precautionary approach, as being of serious concern in the fishery in question. There is a growing international focus on food web considerations in fisheries management" (p. 21).</p>	<p><u><a href="#">2nd Surveillance Assessment Report Icelandic Summer Spawning Herring (2021)</a></u></p> <ul style="list-style-type: none"> <li>• Foodweb considerations: page 45 and page 68</li> </ul>

# D . 5 E V I D E N C E O F A L I G N M E N T

## D.5.08

Summer spawning herring is considered a prey species, and food-web interaction are detailed on page 45 and page 68 of the 2nd Surveillance Assessment Report (2021) Icelandic Summer Spawning Herring Commercial Fishery.



# D . 5 E V I D E N C E O F A L I G N M E N T

D.5.09	
GSSI Component	Guidance
<p>The standard requires the existence of management measures, as necessary, designed to achieve the management objectives (D.2.08) that seek to minimize adverse impacts of the unit of certification, including any associated enhancement activities, on the structure, processes and functions of aquatic ecosystems that are likely to be irreversible or very slowly reversible.</p>	<p>Ecosystem structure, processes and function are described in the Glossary. This language is in accordance with Section 4.1.4.1 of the FAO Ecosystem Approach to Fisheries, which suggests one of the broad management objectives for a fisheries could be to keep impact on the structure, processes and functions of the ecosystem at an acceptable level.</p> <p>Adverse impacts that are likely to be irreversible or very slowly reversible are discussed in the Glossary. These may include genetic modification and changed ecological role.</p> <p>An earlier version of the requirements included an Essential Component on the conservation of biodiversity. Conservation of biodiversity is not mentioned separately in the Guidelines, but it is included in the CCRF Article 7.2.2 (d), which requires that States and sub-regional or regional fisheries management organizations and arrangements should adopt appropriate measures, based on the best scientific evidence available to provide that inter alia biodiversity of aquatic habitats and ecosystems is conserved. The structure, processes and function of aquatic ecosystems includes biodiversity, hence this is considered to be included in this Essential Component.</p>
Conclusion	References
<p>The existence of management measures to minimize adverse impacts on ecosystem processes and functions are required through the following clauses of the IRFM Standard:</p> <p>1.3.2.3.1 "Information on the biology, life-cycle and structure of the stock shall be taken into account when designing management measures to promote optimal utilization of the stock with respect to resilience to natural variability and fishing" (p.14); and</p>	<p><a href="#"><u>IRFM Standard revision 2.1</u></a></p>

# D . 5 E V I D E N C E O F A L I G N M E N T

## D.5.09

3.2.5.1 "Management plans shall be developed and implemented in a timely fashion for avoiding, minimizing or mitigating any ecosystem issues properly identified, based on risk analysis and scientific advice, consistent with the precautionary approach, as being of serious concern in the fishery in question" (p.21).

In relation to enhancement activities, enhanced fisheries are not covered under the scope of the IRFM Standard (p. 4, footnote 2).

# D . 5 E V I D E N C E O F A L I G N M E N T

D.5.10	
GSSI Component	Guidance
<p>The standard recognizes management measures commonly used in small scale fisheries can achieve adequate levels of protection for stocks in the face of uncertainty about the state of the resource and that a past record of good management performance could be considered as supporting evidence of the adequacy of the management measures and the management system.</p>	<p>This Essential Component derives from paragraph 32 of the Marine Ecolabelling Guidelines. It cuts across the other components covering management measures and seeks recognition within the certification scheme that less sophisticated management measures commonly used in small scale fisheries can still achieve adequate protection of stocks, providing uncertainty is properly addressed. The scheme could, for example, accept a past record of good outcomes under such management measures as evidence of their adequacy.</p>
Conclusion	References
<p>Considering the context, that Iceland fishery management system operates uniformly across all fisheries in Iceland, regardless of scale; however, the Standard does accommodate for gaps in information within the management system that may include information gaps associated with smaller scale vessels. An example of this is the Non Conformance raised against clause 2.3.2.4 as described in the 2<sup>nd</sup> surveillance audit for Icelandic ling Dec 2021. In this case, there were gaps in knowledge due to underreporting of seabirds and marine mammals bycatch, particularly noted in the smaller scale vessels. 2.3.2.4. Catch amounts by species and fishing area shall be estimated and continually recorded in fishing logbooks on-board the fishing vessels</p>	<ul style="list-style-type: none"> <li>• <a href="#"><u>IRFM Standard revision 2.1</u></a></li> <li>• <a href="#"><u>Icelandic Ling 2<sup>nd</sup> surveillance report dec 2021</u></a> <ul style="list-style-type: none"> <li>▪ Page 87</li> <li>▪ Page 91</li> </ul> </li> </ul>

# D . 5 E V I D E N C E O F A L I G N M E N T

# D . 5 E V I D E N C E O F A L I G N M E N T

D.6.01	
GSSI Component	Guidance
The standard requires that the stock under consideration is not overfished.	The stock under consideration is considered to be overfished if its stock size is below its limit reference point (or its proxy). Decision rules should avoid stocks falling below Blim but sometimes they do not for reasons that may or may not be wholly or partly due to the fishery and/or the management of the fishery. Nevertheless, the language in the Guidelines states that "the stock under consideration is not overfished, and is maintained at a level which promotes the objective of optimal utilization and maintains its availability for present and future generations." If the stock under consideration of a certified fishery becomes overfished, the scheme should cause the certification of this fishery to be suspended or revoked.
Conclusion	References
<p>The IRFM Standard requires in 1.3.1.2 that "The stock under consideration shall not be over-fished to a level causing recruitment overfishing" (p. 13).</p> <p>Evidence of this is demonstrated in the Icelandic Haddock Commercial Fishery Reassessment Report (2019) on page 102</p>	<ul style="list-style-type: none"> <li>• <a href="#"><u>Haddock Commercial Fishery Reassessment Report (2019)</u></a></li> <li>• Clause 1.3.1.2 page 102</li> </ul>

# D . 5 E V I D E N C E O F A L I G N M E N T

D.6.02	
GSSI Component	Guidance
The standard requires the existence of outcome indicator(s) consistent with achieving management objectives for the stock under consideration (D.2.01, - D.2.03).	The relevant management objectives are those referred to in Performance Area 2 and are for the whole of the stock under consideration. The outcome indicators should be consistent with demonstrating that the management objectives have been effectively achieved. Outcome indicators are required for all management objectives for the stock under consideration, which may include, for example, target reference points that take into account the requirements of dependent predators, where appropriate (D.2.07).
Conclusion	References
<p>The outcome indicators for the stock under consideration in the IRFM Standard are optimizing utilization (MSY proxy) and prevent recruitment overfishing (clauses 1.3.2.1 and 1.3.2.2; p. 13-14), through concordance of the Total Allowable Catch (TAC) with actual catch (2.2.1; p. 16) and which are ministered consistently within the management system (ITQ) (clause 1.5.8; p. 15).</p> <p>These objectives are developed based on the best available, peer reviewed, scientific information, documented in FMPs and implemented (clauses 1.1.8.4, 1.1.9.1 and 1.1.9.2; p. 11).</p>	<p><a href="#"><u>IRFM Standard revision 2.1</u></a></p>

# D . 5 E V I D E N C E O F A L I G N M E N T

D.6.03	
GSSI Component	Guidance
<p>The standard requires that the natural reproductive stock components of enhanced stocks are not overfished.</p>	<p>All Essential Components that address Enhanced Fisheries can be "not applicable" to schemes that explicitly do not cover these fisheries. In the case of enhanced fisheries, the stock under consideration may comprise naturally reproductive components and components maintained by stocking. The natural reproductive stock component of enhanced stocks is described in the Glossary.</p> <p>In the context of avoiding significant negative impacts of enhancement activities on the natural reproductive components of the stock under consideration, the Inland Ecolabelling Guidelines state that displacement [of the naturally reproductive components of enhanced stocks by stocked components] must not result in a reduction of the natural reproductive stock component below abundance-based target reference points (or their proxies).</p> <p>Decision rules (D.5.03) should avoid stocks falling below Blim but sometimes they do not for reasons that may or may not be wholly or partly due to the fishery and/or the management of the fishery. Nevertheless, the language in the Guidelines states that both the stock under consideration and the naturally reproductive components of enhanced stocks are not overfished. In addition, naturally reproductive components of enhanced stocks are not substantially displaced by stocked components. If the stock under consideration of a certified fishery becomes overfished, the scheme should cause the certification of this fishery to be suspended or revoked.</p>
Conclusion	References
<p>Enhanced fisheries are not covered under the scope of the IRFM Standard (p. 4, footnote 2).</p>	<p><a href="#"><i>IRFM Standard revision 2.1</i></a></p>

# D . 5 E V I D E N C E O F A L I G N M E N T

D.6.04	
GSSI Component	Guidance
In the case of enhanced fisheries, the standard requires that the natural reproductive stock component of enhanced stocks is not substantially displaced by stocked components.	<p>All Essential Components that address Enhanced Fisheries can be "not applicable" to schemes that explicitly do not cover these fisheries. In the case of enhanced fisheries, the stock under consideration may comprise naturally reproductive components and components maintained by stocking. The natural reproductive stock component of enhanced stocks is described in the Glossary.</p> <p>With respect to "substantially displaced", in particular, displacement must not result in a reduction of the natural reproductive stock component below abundance-based target reference points (or their proxies).</p>
Conclusion	References
Enhanced fisheries are not covered under the scope of the IRFM Standard (p. 4, footnote 2).	<a href="#"><u>IRFM Standard revision 2.1</u></a>



# D . 5 E V I D E N C E O F A L I G N M E N T

D.6.05	
GSSI Component	Guidance
<p>The standard requires the existence of outcome indicator(s) consistent with achieving management objectives for non-certified stocks (i.e. stocks/species in the catch that are other than the stock under consideration) (D.2.04).</p>	<p>The relevant management objectives are those referred to in Performance Area 2 and are for non-certified species/stocks. The outcome indicators should be consistent with demonstrating that the management objectives (D.2.04) have been effectively achieved. Non-certified catches refers to species/stocks that are taken by the unit of certification other than the stock for which certification is being sought (see Glossary).</p> <p>Examples of irreversible or very slowly reversible effects on bycatch species include excessive depletion of very long-lived organisms (see Glossary). To mitigate effects that are likely to be irreversible or very slowly reversible requires those effects to be made less severe such that they are no longer likely to be irreversible or very slowly reversible.</p>
Conclusion	References
<p>IRFM Standard addresses non-target catches in the following clauses:</p> <p>2.3.2.11 "In cases of mixed species catches all commercial species shall be landed" (p. 18)</p> <p>2.3.3.1 "Landed catches shall be subtracted form relevant quotas (allowable catch) of the vessel or vessel group" (p.18)</p> <p>3.2.2.1 "Discarding, including discarding of non-target commercial stocks is prohibited" (p. 20) ;</p> <p>Icelandic Fisheries are mixed species fisheries. As discarding is prohibited and all catches need to be landed, the management objectives for non-certified stocks are part of the stock under consideration with management objectives and outcomes.</p> <p>The IRFM Standard requires that management objectives are developed on the best available, peer reviewed scientific information, documented in the FMPs and implemented (1.1.8.4, 1.1.9.1 and 1.1.9.2; p. 11).</p>	<p><a href="#"><u>IRFM Standard revision 2.1</u></a></p>

# D . 5 E V I D E N C E O F A L I G N M E N T

## D.6.05

The harvesting policy is provided by a competent body (1.5.1 - p. 15) and includes consistency with the precautionary approach (1.4.1 - p. 14) and is reviewed periodically. TAC's are administered consistently using the ITQ system. Vessels are monitored, landings are recorded and recording systems are in place to ensure accountability for catches and landing verification - including stock not under consideration.

Annual scientific survey by MRI and ICES on stock status and stock assessment updates determine whether objectives have been met and measures are appropriate.

# D . 5 E V I D E N C E O F A L I G N M E N T

D.6.06	
GSSI Component	Guidance
<p>The standard requires the existence of outcome indicator(s) consistent with achieving management objectives (D.2.05) that seek to ensure that Endangered species are protected from adverse impacts resulting from interactions with the unit of certification and any associated culture or enhancement activity, including recruitment overfishing or other impacts that are likely to be irreversible or very slowly reversible.</p>	<p>The context of this Essential Component is Endangered Species. Endangered species are defined in the Glossary. These species are already adversely impacted at the population level, by definition, and are susceptible to further adverse impacts at this level from which they need to be protected. Where "adverse impacts" is used in relation to Endangered Species in the FAO Guidelines there is no further qualification provided (i.e. no "significant" or "severe"). Elsewhere in the Guidelines, the term "adverse impacts" is qualified, but in each case this is in a very specific context. For example. The term "significant negative impacts" is used in the FAO Ecolabelling Guidelines only in relation to enhanced fisheries and "severe adverse impacts" is used only in relation to dependent predators. The term "significant adverse impacts" occurs only in the Deep Sea Guidelines with respect to VMEs.</p> <p>The outcome indicators required by the standard should be consistent with demonstrating that the management objectives for Endangered Species (D.2.05) have been effectively achieved. The actual outcome would be measured by an assessment required under D.4.10.</p> <p>The FAO Ecolabelling Guidelines acknowledge that much greater scientific uncertainty is to be expected in assessing possible adverse ecosystem impacts of fisheries than in assessing the state of target stocks (paragraph 31 (41)), hence the outcome indicators necessary to meet this Essential Component should take into account risk and uncertainty.</p>
Conclusion	References
<p>The IRFM Standard requires this through: 3.1.1 "Adverse impacts of the fishery on the ecosystem shall be considered and appropriately assessed and effectively addressed, consistent with the precautionary approach" (p. 20);</p>	<p><a href="#"><i>2nd Surveillance Assessment Report Icelandic Ling Commercial Fisheries</i></a></p> <ul style="list-style-type: none"> <li>• Endangered Threatened and Protected (ETP) and vulnerable</li> </ul>

# D . 5 E V I D E N C E O F A L I G N M E N T

## D.6.06

3.1.2 "Those impacts that are likely to have serious consequences shall be addressed. This may take the form of an immediate management response or further analysis of the identified risk" (p. 20);  
3.2.1.2 "Information shall be available on the potential effect of fishing on endangered, threatened and protected species, as appropriate and relevant in the context of the unit of certification" (p. 20);  
3.2.2.4 "Suitable steps shall be considered to avoid, minimize or mitigate encounters with endangered, threatened and protected species, as appropriate and relevant in the context of the unit of certification" (p. 21).

In relation to enhancement activities, enhanced fisheries are not covered under the scope of the IRFM Standard (p. 4, footnote 2).

Examples of interactions with endangered and vulnerable species and how these are dealt with from a management objective can found in the assessment reports. Example 2nd Surveillance Assessment Report (2021) for Icelandic Ling Commercial Fishery (p. 50 - 54 and p 78 - 103)

species interactions; p. 50 - 54 and p 78 - 103

# D . 5 E V I D E N C E O F A L I G N M E N T

## D.6.07

GSSI Component	Guidance	
<p>The standard requires the existence of outcome indicator(s) consistent with achieving management objectives (D.2.06) for avoiding, minimizing or mitigating the impacts of the unit of certification on essential habitats for the “stock under consideration” and on habitats that are highly vulnerable to damage by the fishing gear of the unit of certification.</p>	<p>The outcome indicators should be consistent with demonstrating that the management objectives have been effectively achieved for habitat (D.2.06).</p> <p>Essential habitats are described in the Glossary. Examples of impacts on habitat that should be avoided include the destruction or severe modification of rare and/or vulnerable habitats. In assessing fishery impacts, the full spatial range of the relevant habitat should be considered, not just that part of the spatial range that is potentially affected by fishing.</p> <p>The FAO Guidelines acknowledge that much greater scientific uncertainty is to be expected in assessing possible adverse ecosystem impacts of fisheries than in assessing the state of target stocks (paragraph 31 (41)), hence the outcome indicators necessary to meet this Essential Component should take into consideration risk and uncertainty.</p>	
Conclusion	References	
<p>The IRFM covers this component through the following clauses:</p> <p>3.1.1 "Adverse impacts of the fishery on the ecosystem shall be considered and appropriately assessed and effectively addressed, consistent with the precautionary approach" (p. 20);</p> <p>3.1.2 "Those impacts that are likely to have serious consequences shall be addressed. This may take the form of an immediate management response or further analysis of the identified risk" (p. 20);</p> <p>3.2.3.1 "If studies show that the spawning or nursery areas or other essential habitats in the fishing area are at risk and highly vulnerable to negative impacts of particular fishing gear, such impacts shall be limited in range relative to the full spatial range of the habitat or else action is taken to avoid, minimize or mitigate such impacts" (p. 21).</p>	<ul style="list-style-type: none"> <li>• <a href="#"><u>2nd Surveillance Assessment Report (2021) Icelandic Haddock Commercial Fishery</u></a></li> <li>• Habitat (p. 53-60 and 80-84)</li> </ul>	

# D . 5 E V I D E N C E O F A L I G N M E N T

## D.6.07

In practice for Icelandic certified fisheries, the outcome indicators consists of mapping essential and highly vulnerable habitats to the impact of fishing gear used by the unit of certification, and actions taken to protect these, e.g. area closure for certain gear types, or temporal closures of spawning grounds. This is exemplified in the 2nd Surveillance Assessment Report (2021) for Icelandic Haddock Commercial Fishery under the sections Habitat (p. 53-60 and 80-84)

# D . 5 E V I D E N C E O F A L I G N M E N T

D.6.08	
GSSI Component	Guidance
<p>The standard includes outcome indicator(s) consistent with achieving management objectives (D.2.07) that seek to avoid severe adverse impacts on dependent predators resulting from fishing on a stock under consideration that is a key prey species.</p>	<p>The outcome indicators should be consistent with demonstrating that the management objectives have been effectively achieved for dependent predators (D.2.07). Dependent predators are described in the Glossary.</p> <p>The FAO Guidelines acknowledge that much greater scientific uncertainty is to be expected in assessing possible adverse ecosystem impacts of fisheries than in assessing the state of target stocks (paragraph 31 (41)), hence the outcome indicators should take into account risk and uncertainty.</p>
Conclusion	References
<p>The IRFM Standard covers this component through the clauses:</p> <p>3.2.4.1 "Food web considerations - If the stock under consideration is a key prey species in the ecosystem, the harvesting policy and management measures shall be directed to avoid severe adverse impacts on dependent predators" (p. 21)</p> <p>The objective GSSI component is to avoid severe adverse impacts on dependent predators resulting from fishing on a stock under consideration being a key prey species. Determining whether a species is a key prey species is the first outcome, implementing management measures to avoid severe adverse impact by the harvesting policy the second.</p> <p>Of the certified Icelandic fisheries, Icelandic summer spawning herring is determined to be a prey species. However, in the assessment reports it has been determined that the Icelandic marine ecosystem is not considered wasp-waisted due to the presence of several</p>	<p><a href="#"><u>2nd Surveillance Assessment Report Icelandic Summer Spawning Herring (2021)</u></a></p> <ul style="list-style-type: none"> <li>• Foodweb considerations: page 45 and page 70</li> </ul>

## D . 5 E V I D E N C E O F A L I G N M E N T

### D.6.08

abundant, high biomass, low level fish stocks (capelin, mackerel and blue whiting) that provides other pathways for energy transference to higher trophic levels. It is determined that the current management regime and based on harvest strategy assumptions, there is little risk of Icelandic fisheries reducing herring stocks to the point where populations of dependent predators would be adversely affected. (2nd Surveillance Assessment Report (2021) Icelandic Summer Spawning Herring Commercial Fishery page 45 and page 70)



# D . 5 E V I D E N C E O F A L I G N M E N T

D.6.09	
GSSI Component	Guidance
<p>The standard requires the existence of outcome indicator(s) consistent with achieving management objectives (D.2.08) that seek to minimize adverse impacts of the unit of certification, including any enhancement activities, on the structure, processes and function of aquatic ecosystems that are likely to be irreversible or very slowly reversible. Any modifications to the habitat for enhancing the stock under consideration must be reversible and not cause serious or irreversible harm to the natural ecosystem’s structure, processes and function.</p>	<p>The outcome indicators should be consistent with demonstrating that the management objectives for impacts on the structure, processes and function of aquatic ecosystems (D.2.08) have been effectively achieved. The component relating to enhancement activity may be "not applicable" to schemes that explicitly do not cover enhanced fisheries.</p> <p>Ecosystem structure, processes and function are described in the Glossary. This language is in accordance with Section 4.1.4.1 of the FAO Ecosystem Approach to Fisheries, which suggests one of the broad management objectives for a fisheries could be to keep impact on the structure, processes and functions of the ecosystem at an acceptable level.</p> <p>The FAO Guidelines acknowledge that much greater scientific uncertainty is to be expected in assessing possible adverse ecosystem impacts of fisheries than in assessing the state of target stocks (paragraph 31 (41)), hence the outcome indicators necessary to meet this Essential Component should take into account risk and uncertainty.</p>
Conclusion	References
<p>The IRFM requires this through 3.2.5.1 "Management plans shall be developed and implemented in a timely fashion for avoiding, minimizing or mitigating any ecosystem issues properly identified, based on risk analysis and scientific advice, consistent with the precautionary approach, as being of serious concern in the fishery in question" (p. 21).</p>	<p><a href="#"><u>IRFM Standard revision 2.1</u></a></p>

## D . 5 E V I D E N C E O F A L I G N M E N T

### D.6.09

The outcome indicator that is associated with this IRFM requirement is the Fishery Management Plan that lays out management measures in relation to adverse impacts on ecosystem structure, processes and function by the unit of certification.

In practice, this entails e.g. protection spawning habitat of many key species through temporal and permanent closures, prohibiting of certain gear types, closure of habitats that are vulnerable to fishing gear impacts, etc.

In relation to enhancement activities, enhanced fisheries are not covered under the scope of the IRFM Standard (p. 4, footnote 2).