

## OPEN PUBLIC COMMENT

The Highly Migratory Species Advisory Subpanel (HMSAS) discussed potential fisheries certification systems through the US government agencies such as National Oceanic and Atmospheric Administration (NOAA)/National Marine Fisheries Service as alternatives to third party certifications such as Marine Stewardship Council (MSC) and others.

Certifications such as MSC have origins in Europe as a result of mismanagement of European fisheries. These are used to certify fisheries in the U.S. at considerable expense to U.S. fishermen, amounting to over \$100,000 initial fees per fishery with annual costs of up to \$20,000 and additional chain of custody costs.

Third party certification bodies generally based in Europe certify U.S. fisheries that already are deemed sustainable and well-managed under existing U.S. laws.

The HMSAS would like the Council to include this issue on a future agenda and have the Council direct advisory bodies to identify present certification systems and costs affecting U.S. west coast fisheries.

The HMSAS is concerned about the U.S. government creating a new layer of regulatory requirements on fishermen. However, the HMSAS believes the present NOAA “FishWatch” program is an excellent example of support of U.S. fisheries and domestic management. This should possibly be expanded as a way to promote U.S. domestic fisheries to the consuming public.

The HMSAS believes that federally-directed U.S. fisheries are sustainable and well-managed through the Magnuson Stevens Act and U.S. laws. The NOAA “FishWatch” program gives the U.S. government an opportunity to promote sustainable U.S. harvested seafood for both domestic and international markets.

PFMC  
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