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President: Andrew A. Rosenberg, Ph.D.

21 July 2014

Dr Annika Mackensen, WWF Smart Fishing Initiative
Mr. Peter Hardstaff, WWF New Zealand

Dear Dr. Mackensen and Mr. Hardstaff:

Thank you for your letter suggesting changes to the default assessment tree and recommendation for using the risk-based framework (RBF) for the orange roughy assessment.

The assessment team has considered your proposals. With respect to the assessment tree we believe that we can accommodate your concerns regarding the application of P1 and P2 (habitat) to orange roughy within the existing performance indicators. With respect to the RBF, we still do not believe it is necessary for habitat and ecosystem effects. Therefore, we have concluded that changes to the assessment tree or use of the RBF will not improve the results of the assessment. We came to this conclusion for these reasons:

Revising the Assessment Tree

PI 1.1.1. The suggestion for a new scoring issue relates to whether the point at which recruitment would be impaired is known with accuracy. The ability to estimate this parameter is relevant only in the relative rather than an absolute sense, i.e., as a proportion of unfished biomass, which is also a key output of any assessment method. In addition, the need to estimate this parameter accurately (rather than fairly imprecisely) itself depends on stock status. If the stock is close to the target level, the biomass will be above this point of impairment. However, the lower the relative biomass, the greater attention the team will place on the quality of the data on which the point at which recruitment is argued to be impaired. The issue of the ability to estimate limit reference points and their relationship to the point at which recruitment may be impaired is also covered in P1.1.2.

PI 1.1.2. The team is aware of the multiple reference point issue. The pre-assessment report made explicit reference to the hard and soft limits, noting that the hard limit is less than MSC default limit reference point of 20% of B_0 or half of B_{MSY} . We also note in that report that the justification of the target reference point range is missing. The default assessment tree requires us to address the appropriateness of the reference points, to evaluate the limit reference point relative to the point of recruitment impairment, and to evaluate the target reference point relative to B_{MSY} .

We note that the West Coast (US) Groundfish Fishery, which contains long-lived, slow growing rockfish with life histories similar to orange roughy, has received MSC certification using the default assessment tree.

PI 2.4.1. The default tree already requires consideration of impacts to structure AND function of the habitat. The assessment team acknowledges WWF's concern and we understand that we need to be explicit on these two points in our rationales for these fisheries. The tree does not need to be changed to accommodate this.

Risk-based Framework

PI 2.2.1. The assessment team pointed out the lack of information for several bycatch species in the pre-assessment. The client has assured us that New Zealand scientists have conducted analyses sufficient to assess all bycatch species with the default assessment tree. We will evaluate these

analyses and draw conclusions as warranted. The Deep Water Group will post the New Zealand analyses on its website.

PI 2.4.1 and 2.5.1. The SICA is the only RBF tool available for these two PIs, and the scoring issues and guideposts contained in the default tree are already essentially risk questions (i.e. the fishery is unlikely to reduce habitat structure and function. CB3.14.6.1 and CB3.17.5.1, for habitats and ecosystems, respectively, explain that it is acceptable for the team to use qualitative analysis and/or expert judgments in scoring a fishery at the SG60 and SG80 levels for these PIs, so long as there's a justification for how the results of the qualitative analysis and/or expert judgments relate back to the quantitative thresholds required. These sections go on to explain that the SICA may be used as a means of obtaining the range of viewpoints and constructing the probability interpretation of the scoring guideposts. The assessment team considers that there is virtually no difference between use of the RBF for these PIs and using the default assessment tree, because in reality, in most cases, there will be a qualitative interpretation leading to judgments about probabilities of serious or irreversible harm. The SICA provides a structured framework for obtaining qualitative information that we may or may not elect to use. Explicitly specifying the use of the RBF for these PIs actually restricts our ability to make use of all available information and construct an appropriate scoring rationale.

Best regards,



Robert J. Trumble, PhD
President-Fisheries

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