

INTERNATIONAL DOLPHIN CONSERVATION PROGRAM

**WORKING GROUP TO PROMOTE AND PUBLICIZE THE AIDCP
DOLPHIN SAFE TUNA CERTIFICATION SYSTEM**

20th MEETING

LIMA, PERU
07 JULY 2014

DOCUMENT DSP-20-04

ACTIONS TO PROMOTE AIDCP DOLPHIN-SAFE TUNA

At its 14th meeting in October 2009, the Working Group reviewed Document [DSP-14-04](#) regarding a plan to promote AIDCP dolphin-safe tuna, summarized in ten elements formulated by the Chair of the group.

The Meeting of the Parties endorsed the plan as a vehicle for making progress on promotion of the AIDCP dolphin-safe label. Element 1 of the plan contemplates the preparation of informational material and educational campaigns for the general public, and instructs the Secretariat to evaluate and carry out these tasks. This document reports progress on three projects: a promotional video to highlight the conservation achievements of the AIDCP and the benefits of the AIDCP dolphin-safe label, an educational module to be shared through other appropriate organizations, and a promotional pamphlet.

Regarding the promotional video, a preliminary version was presented was reported at the meeting in October 2013. On the basis of the comments made at that meeting and received in writing afterwards, a new version was prepared, available (with password) on the [IATTC website](#).

Since the contract with the company that made the video has expired, and unless this or another company is hired again, this version should be considered definitive, and be published on the IATTC website and made available to any Party that wishes to use it.

As regards the promotional leaflet, which was also reviewed at the meeting in October 2013, attached ([Appendix 1](#)) is the version that reflects the comments made at the meeting and subsequently. As with the video, the plan is to make it available on the IATTC website.

Regarding the education module on the AIDCP and its achievements, to be posted on the websites of the IATTC, AIDCP Parties, other international fisheries bodies, and participating non-governmental organizations, the attached version ([Appendix 2](#)) that reflects the comments received from the Parties. Unlike the promotional leaflet, the working group still needs to finish editing the module, on the basis of the alternatives identified in the draft and the comments made in writing by some Parties.

AIDCP protects



Established in 1950, the Inter-American Tropical Tuna Commission (IATTC) is one of the most successful regional fisheries management organizations. The IATTC carries out research on the tuna stocks targeted by the fisheries in the eastern Pacific Ocean (EPO), and establishes management rules to ensure the conservation and sustainable use of those stocks. The IATTC staff serves as the Secretariat for the AIDCP.



**APICD
Dolphin
Safe
Label**



**For further information
Please contact IATTC
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(858) 546 7100
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The AIDCP dolphin safe label signifies:

-  Tuna caught in fishing operations monitored by an observer on board.
-  A guarantee to the consumer that tuna was caught in sets in which no dolphins were killed or seriously injured.
-  Tuna caught consistent with a conservation and management program supported by the best scientific information available.
-  A labeling standard supported by a binding international agreement that incorporates strict operational fishing measures, close supervision, and sanctions for violations all under a transparent, participative, and verifiable scheme.
-  A system for tracking and verification of tuna's dolphin safe status, from the sea to the consumer.
-  Compliance with certification standards and guidelines adopted under an awarded multinational agreement which received the Margarita Lizarraga medal presented by the UN FAO in 2005 for the AIDCP's contributions to responsible fisheries.



The AIDCP dolphin safe label

-  The AIDCP dolphin safe label was created by the Parties to the AIDCP, which is administered by the IATTC.

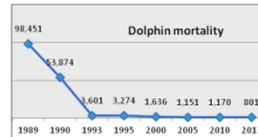


-  The Parties to the AIDCP are Belize, Colombia, Costa Rica, Ecuador, El Salvador, European Union, Guatemala, Honduras, Mexico, Nicaragua, Panama, Peru, United States, and Venezuela. Bolivia and Vanuatu apply it provisionally.

-  This program was developed for application in the Eastern Pacific Ocean. Among its achievements are substantial reductions in the incidental mortality of dolphins in the tuna fishery, promotion of the capture large yellowfin tunas and ensuring the long-term sustainability of yellowfin tuna stocks and the other living marine resources impacted by the fishery.



-  This program has achieved great success in reducing the incidental mortality of dolphins by 99%.



-  The AIDCP not only promotes dolphin conservation, but also the conservation of other marine species, such as turtles, seabirds and sharks-, some of which are considered threatened.

-  The AIDCP includes unique aspects such as training and qualification of fishing captains, strict operating requirements for vessels such as performance of a backdown maneuver and the use of divers to ensure the safe release of all dolphins, 100% coverage by independent on-board observers, full transparency, and enforcement.



-  Another critically important aspect unique to EPO fisheries, is the AIDCP and IATTC system for reporting and dealing with non-compliance. In other regions, it is a rare event when such violations come to light.

Appendix 2

DSP Module USA EU comments June 2014 ENG

INTERNATIONAL DOLPHIN CONSERVATION PROGRAM

WORKING GROUP TO PROMOTE AND PUBLICIZE THE AIDCP DOLPHIN SAFE TUNA CERTIFICATION SYSTEM

At the request of the Working Group, the Secretariat compiled the comments and suggested edits received since this document was last reviewed at the 28th Meeting of the Parties in October 2013.

THE AGREEMENT ON THE INTERNATIONAL DOLPHIN CONSERVATION PROGRAM (AIDCP) AND THE AIDCP DOLPHIN SAFE LABEL: LEADERSHIP THROUGH RESPONSIBLE FISHING PRACTICES



WHAT IS THE AIDCP?

The Agreement for the International Dolphin Conservation Program (APICD) is a multilateral agreement for the protection of dolphins in the tuna fisheries in the eastern Pacific Ocean (EPO), ~~is one of the most successful agreements in the world on the conservation and management of living marine resources.~~ Adopted in 1998, the Agreement was the culmination of years of work to address concerns regarding dolphin mortality in the purse-seine fisheries for tunas in the EPO.

The objectives of the AIDCP are:

- ~~1. To progressively reduce incidental dolphin mortalities in the tuna purse-seine fishery in the Agreement Area to levels approaching zero, through the setting of annual limits;~~
- ~~2. With the goal of eliminating dolphin mortality in this fishery, to seek ecologically sound means of capturing large yellowfin tunas not in association with dolphins; and~~
- ~~3.~~

~~To ensure the long-term sustainability of the tuna stocks in the Agreement Area, as well as that of the marine resources related to this fishery, taking into consideration the interrelationship among species in the ecosystem, with special emphasis on, inter alia, avoiding, reducing and minimizing bycatch and discards of juvenile tunas and non-target species. To progressively reduce and eliminate dolphin mortalities in the tuna purse-seine fishery in the EPO;~~

- ~~1. To seek ecologically sound means of capturing large yellowfin tunas not in association with dolphins; and~~
- ~~2. To ensure the long-term sustainability of EPO tuna stocks, and other living marine resources impacted by tuna fisheries, with emphasis on avoiding, reducing and minimizing bycatches and discards of juvenile tunas and non-target species.~~

Under this program and its predecessor, the 1992 La Jolla Agreement, dolphin mortality in the

Comment [EUR1]: What is the basis for this statement?. What are the other agreements in the world we are comparing to? What are the criteria used in the comparison?

Comment [USA2]: This is a somewhat subjective statement without any underlying scientific basis in terms of qualifying or quantifying a degree of success. In a document issued by the Secretariat of an international organization (IATTC) or on behalf of the Parties (AIDCP) we'd prefer to allow the actual data on the AIDCP's performance to illustrate its level of success.

Comment [USA3]: The objectives of the agreement are listed in Article II. We believe that it is appropriate to include them verbatim. The paraphrasing in the draft could be mis-read to be subjective or include elements which the AIDCP did not express.

fishery has decreased 99% from previous levels.

WHO PARTICIPATES IN THE AIDCP?

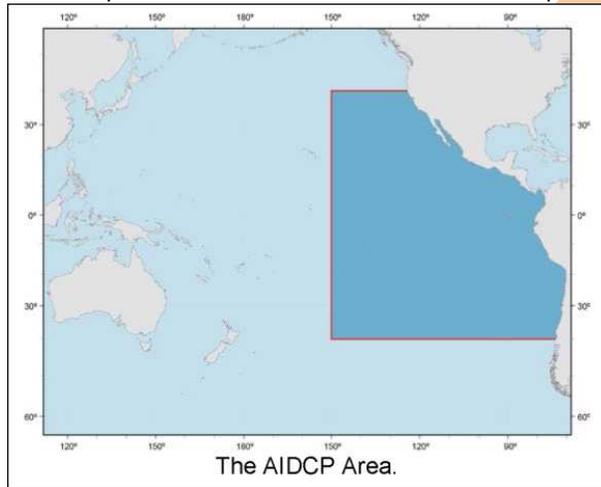
Currently, the Parties to the Agreement are Belize, Colombia, Costa Rica, Ecuador, El Salvador, European Union, Guatemala, Honduras, Mexico, Nicaragua, Panama, Peru, United States, Vanuatu, and Venezuela. Also, Bolivia applies the AIDCP, although it is not a Party.

The work of the AIDCP is transparent, and the participation of interested stakeholders is encouraged.

Accordingly, the Agreement provides for the participation of representatives from environmental non-governmental organizations (NGOs) and the tuna industry in the work of the AIDCP's compliance body, the International Review Panel (IRP).

WHY WAS THE AIDCP CREATED?

In the 1950s, [purse-seine](#) fishermen discovered a unique association, found almost exclusively in the tropical eastern Pacific Ocean, between dolphins and yellowfin tuna. Often, schools of large adult yellowfin tuna are found swimming under herds of dolphins on the surface. Since that time, the predominant method for catching adult yellowfin tuna in the region has been to locate dolphin herds at the surface and, using this valuable visual cue, encircle the schools of tuna under the dolphins with purse-seine fishing nets. Frequently, in the course of this operation, dolphins are also encircled in the net. In the early years of the fishery, little effort was made to release encircled dolphins, which became entangled in the nets and drowned. No exact figures are available, but it is estimated that the resulting mortality at times exceeded 150,000 dolphins per year, which led to dramatic declines in some of the dolphin stocks. The international community recognized that this was not desirable or sustainable, and fishermen and researchers began developing equipment and practices that allowed encircled dolphins to be released from the nets unharmed, while retaining the valuable tuna catches below.



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Comment [EUR4]: On what basis is it understood that it is the “predominant” method for yellowfin tuna?. Is it more important than FADs or free-schools in terms of catches?

Comment [EUR5]: Catches are not only adult yellow but also non-adult. The 2012 document refers to catches individuals of sizes from 60 cm

150,000 dolphins per year, which led to dramatic declines in some of the dolphin stocks. The international community recognized that this was not desirable or sustainable, and fishermen and researchers began developing equipment and practices that allowed encircled dolphins to be released from the nets unharmed, while retaining the valuable tuna catches below.

The gear and techniques that were developed reduced dolphin mortality in fishing operations substantially, and in 1992 the countries involved in the fishery signed the La Jolla Agreement, which established a groundbreaking voluntary program to strictly limit the allowable mortality and regulate fishing for tunas associated with dolphins. Many of the hallmarks of that agreement were incorporated in the binding AIDCP, which followed in 1998.

Comment [EUR6]: Explain the term

HOW DOES AIDCP ACHIEVE ITS OBJECTIVES?

The functioning of the AIDCP is guided by the Agreement and its annexes, as well as by the decisions taken by the Parties, which are reflected in the [resolutions](#), [procedures and guidelines](#) that have been adopted. The five most important elements of the AIDCP are:



Top: a purse-seine net is deployed on a school of yellowfin tuna, also encircling a herd of dolphins.
Bottom: dolphins swim unharmed over the float line of the purse- seine net during the backdown maneuver.

Dolphin mortality limits: The Agreement imposes strict dolphin mortality limits for the purse- seine fishery in the Agreement Area. It restricts the total incidental [observed](#) dolphin mortality to no more than five thousand individuals annually. This global limit is then divided among the vessels that are authorized to fish for tunas associated with dolphins. If the limit is reached, then all fishing for tunas associated with dolphins must cease for the rest of the year. However, in practice, the total annual dolphin mortality recorded by observers in the fishery has never exceeded 1,600 individuals since the AIDCP entered into force, [and in 2012 was 870 individuals.](#) Similarly, any vessel that reaches its individual annual Dolphin Mortality Limit (DML) must stop fishing for tunas associated with dolphins for the rest of the year. Finally, annual mortality limits, based on the best available science, are set for the various individual dolphin stocks impacted by the fishery. If any one of these limits is reached, fishing for tunas associated with that stock by the entire fleet must cease for the remainder of the year. Again, in practice, none of these limits has ever been reached. [The individual dolphin](#)

[stock limits should be revised in the near future in order to take account of possible changes in the related dolphin populations.](#)

On-Board Observer Program: Only purse- seine vessels with a carrying capacity greater than 363 metric tons [are permitted to apply for a DML and fish for tunas associated with dolphins,](#) and the Agreement mandates that all such vessels must carry an independent observer aboard at all times, whether or not they fish for tunas associated with dolphins. The observers, who have received extensive training in order to ensure that they can perform all the necessary duties and functions, record the vessels' activities in detail, and send regular reports on [observed](#) dolphin mortality; in this way, compliance with the DML system and other operational requirements of the AIDCP is closely monitored and strictly enforced through reports to, and action by, the IRP. Among their other duties, the observers also record bycatches of non-target species taken during fishing operations.

Operating requirements: The AIDCP also requires the use of specific fishing gear, equipment, techniques and procedures that have proven effective in minimizing harm to dolphins. All vessels with a DML must have a dolphin safety panel installed in their nets, and are required to perform a maneuver known as "backdown" (illustrated in the photo) whenever dolphins are encircled in the net. Used in combination, these two factors allow encircled dolphins to escape

Comment [EUR7]: This figure might be quite high for a non-specialized reader. If we want to mention a specific figure don't we prefer to highlight that mortality per year has been constantly decreasing and that in 2012 the figure was 870 dolphins?

Comment [USA8]: We might want to include a footnote with the conversion to carrying capacity since that is the standard that we now use

Comment [SEC9]: The AIDCP uses only carrying capacity in tons; well volume is used by the IATTC only for capacity management

safely over a portion of the purse-seine net float line that becomes submerged. The vessel must also carry speedboats, a raft, snorkeling gear, and other equipment that allow the vessel crew to make sure that all dolphins are released before the net is retrieved and the tuna catches brought on board. Also, divers are used to release dolphins from the [encirclement net](#).

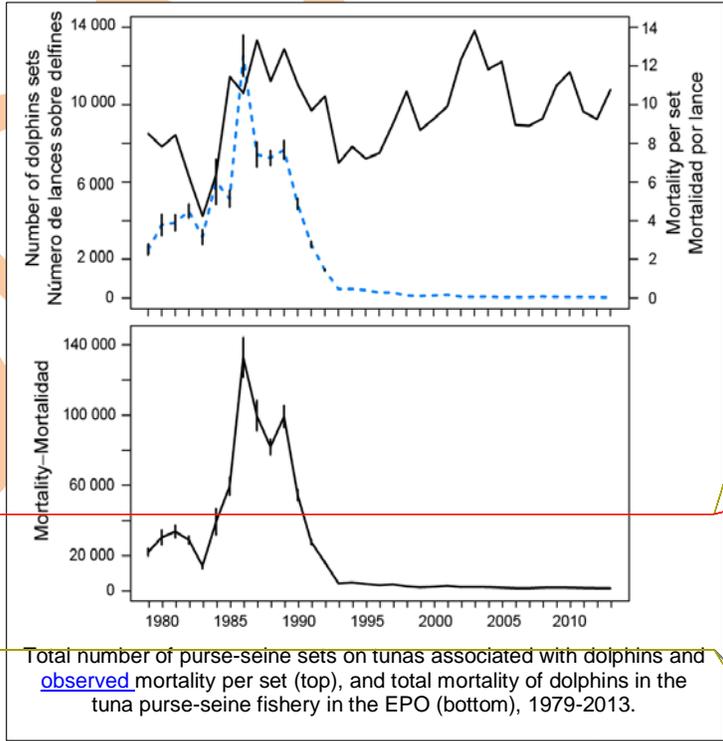
Training and qualification of fishing captains: Under the AIDCP, fishing captains must be trained and authorized before they can direct fishing operations on vessels with DMLs. Authorized captains must be familiar with the requirements of the AIDCP, and trained in how to apply them in order to avoid all possible harm to dolphins. The performance of individual captains is monitored through the on-board observer program and reviewed by the IRP: captains with poor performance records, or who repeatedly commit infractions, are removed from the list of authorized captains and can no longer work on vessels with DMLs.

Compliance monitoring and transparency: Cases of potential infractions recorded by observers are reviewed by the IRP and, if an infraction is identified, the vessel's flag Party is notified. The Party is required to investigate such cases and, if appropriate, apply meaningful sanctions, and then report back to the IRP on the outcomes and disposition of all investigations.

HAS THE AIDCP BEEN A SUCCESS?

The results of the AIDCP have been ~~remarkable by any standards~~ significant. During the last 20 years, since the operational methods now enshrined in the AIDCP began to be commonly used, dolphin mortality in the Agreement Area has declined by over 99% from the levels estimated for the early years of the dolphin fishery. This remarkable achievement has to be seen in the

context of a fishery in which over 10,000 sets on tunas associated with dolphins are made each year, and each set may involve interactions with tens or even hundreds of dolphins. Of course, such success is not possible without the cooperation of the fishermen. In 2011, only 16 possible infractions were presented to the IRP for review, from a total of 11,870 dolphin sets made that year, an average of only 1.4 possible infractions for every 1,000 sets made. ~~Such a compliance record sets the standard to which other international fisheries management organizations should aspire.~~



The graphs show the enormous strides that have been made under the AIDCP. ~~Not only has d~~olphin mortality been drastically reduced under the AIDCP, ~~the EPO~~

- Comment [USA10]:** In a document such as this we very much prefer to avoid highly subjective statements and prefer to use language that is a bit more moderated
- Comment [EUR11]:** If this paper is addressed to the general public they could have some difficulties in understanding that a remarkable success by any standard still implied a mortality of more than 800 dolphins in 2012. We might want to soften the approach as the standard of the reader might be zero-mortality...
- Comment [USA12]:** This statement only refers to possible infractions referred to the IRP. The practice of the AIDCP Parties and the Secretariat is to automatically refer some types of possible infractions to the responsible Party. This statement should be revised to take those other possible infractions into account
- Comment [SEC13]:** 16 is the total number of possible infractions identified by the IRP and referred to the Parties. 7 cases were discussed by the IRP in 2011 and of those, 4 were referred as possible infractions. An additional 12 possible infractions were presented to the IRP in the meeting report, but were not discussed. The IRP was considered to have recommended those as possible infractions as well. No possible infractions are referred to the Parties before being presented to the IRP
- Comment [EU14]:** The first graph is hard to read
- Comment [USA15]:** This seems subjective and unnecessary

~~fishery for yellowfin tuna associated with dolphins has one of the lowest bycatch rates of any commercial tuna fishery in the world. By catching only large, mature yellowfin tuna, the fishery maximizes the sustainable yield from the tuna stocks while minimizing bycatches of other, non-target species and the associated ecosystem impacts. The other two modes of purse-seine fishing used in the EPO, which catch tunas associated with floating objects or in unassociated schools, typically catch juvenile tunas, and are thus not only less efficient in terms of maximizing tuna yield, but also have far greater bycatches of other species: for example, on aggregate, these other methods capture an average of about five times as many manta rays, seven times as many sea turtles, ten times as many sharks and, for some species of fish, several hundred times as many.~~

WHO SUPPORTS THE AIDCP?

The hard work and achievements realized under the AIDCP have been recognized by the international community and environmental NGOs. In recognition of its success, in 2005 the Agreement was awarded the prestigious Margarita Lizarraga Medal, awarded every two years by the UN Food and Agriculture Organization (FAO) for exemplary implementation of international rules for responsible fisheries and marine resource management. In presenting the award, Jacques Diouf, the Director-General of the FAO, commended the Agreement for having diligently applied the relevant principles set forth in the FAO Code of Conduct for Responsible Fisheries, and for the utilization of fishing gear and techniques which have produced the enormous reduction in dolphin mortalities in the fishery. According to the Director- General, the AIDCP was selected for the award *"in recognition of its comprehensive, sustainable and catalytic initiatives in support of the Code of Conduct for Responsible Fisheries, in particular those aspects relating to the precautionary approach and to the utilization of fishing gear and techniques which minimize the catch of non-target species."*

Similarly, the AIDCP has been singled out for praise by a number of major environmental NGOs that have observed the AIDCP in action and, in some instances, participated directly in the work of the IRP:

"Greenpeace and WWF credit the Program with the dramatic decrease in dolphin deaths from approximately 100,000 in 1989 to only 1,500 in 2002. In our view, the International Dolphin Protection Program provides the best approach available not only for continuing to reduce dolphin mortality and improve the chances of recovery of the depleted dolphin populations, but to reduce the impacts of the fishery on the marine ecosystem as a whole." and *"The Agreement addresses the real and growing impact of tuna fishing on the ecosystems of the eastern tropical Pacific and on other species of marine life, and establishes a program for assessing, monitoring and minimizing bycatch of juvenile tuna and non-target species."*

GREENPEACE and WORLD WILDLIFE FUND Joint statement. 26 May 2003

"The AIDCP provides protection for each individual dolphin stock or species to ensure its continued growth and recovery; requires that measures be adopted to avoid and reduce the discard of other marine species caught by the fishery such as sea turtles, sharks and billfish; and mandates actions that will guarantee the sustained health of the tuna fishery and the marine ecosystem of the eastern tropical Pacific."

CENTER FOR MARINE CONSERVATION International Association for Aquatic Animal Medicine website, 2002

WHAT IS THE "AIDCP DOLPHIN SAFE" LABEL?

In June 2001, the Parties to the AIDCP created the voluntary "AIDCP Dolphin Safe" label for tuna products from the EPO. The label gives-conveys to consumers a-guarantee that the tuna

Comment [EU16]: The by-catch of that fishery is precisely dolphins... how can it be said that it has any of the lowest bycatch rates?

Comment [EU17]: In general the text leaves the impression that Dolphin safe is only related with fishery associated with Dolphins when in fact the label is valid for any type of fisheries in the EPO.

Comment [EU18]: As indicated above catches are not only adult yellow but also non-adult. The 2012 document refers to catches individuals of sizes from 60 cm

Comment [USA19]: This is potentially misleading to a reader without intimate knowledge of the AIDCP and the tuna fisheries of the EPO. Bycatch occurs in the EPO, and in the yellowfin purse seine fishery that occurs in the form of dolphins because they are part of the fishing technique. Also, the characterization of the purse seine fishery relative to other tuna fisheries is not substantiated in the document and is not an achievement of the AIDCP but rather an element related to the nature of the different gears/fisheries

Comment [EU20]: It would be necessary here to have a more in-depth discussion about what gear minimizes better the non-target species and the associated ecosystem impacts. In that case pole-and-line and long-liners would probably perform better

Comment [EUR21]: This statement should be clarified. According to ISSF research practically all tuna fishing gears catch juveniles, some more than others. FAD and Pole-and-line fishing captures more juveniles, and longlining catches fewer juveniles, in general. In the EPO, sets on tuna-dolphin associations tend to catch larger yellowfin (about 62% of the yellowfin - in numbers - in these sets are below 100 cm in size).

Comment [USA22]: This is not relevant to achievements of the AIDCP.

Comment [EU23]: It is necessary also to clarify what is intended with this paragraph. In fact, although the statement might be relatively accurate, it is a fact that FAD fishing has a very reduced number of dolphin mortality, which is almost nonexistent in long-liners and zero in pole and line. If dolphin mortality is what we want to address then other fishing methods are more appropriate. The text seems to indicate that dolphin bycatch is preferable to manta, sea-turtles and shark by catches. Is it?

Comment [USA24]: The Greenpeace/WWF quote is 10 years old and CMC no longer exists - it's successor is Oceana. These groups' positions on the AIDCP may have changed, so it is very important for these groups to be made aware that their views will be used in this document on behalf of the governments that are Party to the AIDCP, in part to avoid any possibility that they may react negatively and possibly denounce the document or make similar negative public statements- such an outcome might provide an opening for other NGOs who do not share their views, and would be counter-productive to the objectives of the WG and the Parties. Request that the Secretariat notify and seek concurrence from

products were caught exclusively in purse-seine sets in which there were no observed mortalities or serious injuries of dolphins when the tuna was caught, a claim backed by 100% observer coverage of participating vessels. AIDCP Dolphin Safe tuna certification is supported by a transparent monitoring, tracking, and verification system established under the auspices of the binding international agreement that includes wide participation by the coastal and fishing nations of the EPO.

The "AIDCP Dolphin Safe" status of tuna from the EPO is verified and tracked from the moment of capture all the way through to the point of retail sale. Tuna catches classified as AIDCP dolphin safe are kept separate aboard the fishing vessels from other catches, and are identified by means of unique tuna tracking forms (TTFs). TTF numbers accompany catches through unloading, storage, and processing, to ensure that tuna products receiving the AIDCP label are truly "dolphin safe", thus providing consumers with an absolute guarantee.

In summary, the hallmarks of the "AIDCP Dolphin Safe" label are:

- It guarantees Assurance that no dolphins were observed killed or seriously injured in process of catching the tuna that bears the label.
- It is supported by 100% observer coverage of all fishing trips made by purse-seine vessels of capacity greater than 363 metric tons, including those that fish for tunas associated with dolphins.
- It is based on a system that requires strict compliance with the mandatory requirements of the AIDCP.
- Compliance with these requirements is verified, and the tuna receiving the label are tracked continuously from capture to market.
- The work of the AIDCP and the AIDCP Dolphin Safe certification system are transparent and are monitored by the IRP, which includes governments and representatives from both the tuna industry and environmental NGOs.
- The tuna was harvested in compliance with all applicable conservation and management measures.
- It is fully consistent with the guidelines for the certification of fishery products approved by FAO.
- It is fully consistent with the best scientific information available on the status of the dolphin stocks in the EPO.
- The certification program is conducted under the auspices of a binding international agreement.
- Conscientious consumers concerned about the conservation and protection of dolphins can rest assured that this is the only label in the world that guarantees that no dolphins were killed or seriously injured in the process of catching the tuna, and can back up that claim with 100% observer coverage and a comprehensive tracking and verification system.

Comment [USA25]: Please see our comments on the issue of a guarantee from our input to the video script, a follows: "This phrase, and the repetition of it or a similar assertion elsewhere in the script text, is misleading. First, the certification is one that certifies no dolphins were killed or seriously injured when the tuna was caught. Other harms to dolphins may result from the chase and encirclement of dolphins, including those that occur outside of the nets where observers can document them. Accordingly, this text and the repetition of it or similar assertions elsewhere in the script text should be refined to read, for example, "that certified tuna were caught in sets in which no dolphins were observed killed or seriously injured." Second, the certified tuna does not provide a "guarantee" to consumers. The certification system includes a procedure for verification that the dolphin-safe certification was issued in conformity with the procedures established by the Parties to the AIDCP, but that must be followed in order for a consumer or market actor to check to ensure the dolphin safe status of the tuna. Given that dolphin-safe certificates have been and possibly could be issued in error under the system, any tuna products labeled with the AIDCP Dolphin-Safe label could only be considered valid if the procedure was utilized; if it was not, the label may be used on tuna that was not properly certified. The language in the script text should thus be modified to avoid suggesting that the label provides a "guarantee" to consumers

Comment [USA26]: Since this phrase relates to the Agreement, it should include not only the coastal states but others as well

Comment [USA27]: Has this been verified by either the FAO or the AIDCP Parties?

Comment [USA28]: This seems subjective and does not reflect questions about the rate of recovery of some stocks

Comment [USA29]: This is potentially misleading as the certification program itself, including use of the label, is voluntary.

Comment [USA30]: This appears to be an over-generalization and may not be true in all cases, including some examples in the United States. It also is highly subjective and the language is a departure into contentious territory that strays from a factual characterization of the achievements of the AIDCP.