



Department of Fish and Wildlife

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Sabine Daume,

The Oregon Department of Fish and Wildlife Marine Resources Program Crab Management Program (CMP) has worked closely with the Oregon Dungeness Crab Commission (ODCC) to pursue, achieve and maintain Marine Stewardship Council (MSC) certification for the Oregon Dungeness crab fishery over the past several years. In December 2011, the fishery passed its first annual surveillance audit, having made significant progress on several of the conditions that were placed on the fishery when it was initially certified.

We have committed to continuing to collaborate with ODCC to maintain certification and would like to express our support of ODCC's request to alter the timing of the annual audits. Beginning in early October each year we begin coast wide preseason testing to assess the quality of crabs, ensuring a high-quality product to consumers and avoiding wastage of the resource. During this time we work closely with the states of Washington and California through a Tri-State process to coordinate an organized season opening structure for the entire west coast Dungeness crab fishery. With current staff resources, having the additional workload of preparing for the annual audit in the middle of the most important management period for the fishery is not sustainable.

As the ODCC has proposed, an annual audit time of mid to late February would be a much more realistic time period for us to present our progress regarding the conditions and continue in earnest our partnership role in maintaining certification for the fishery.

Thank-you for your consideration and please contact either of us if you have any questions or require any additional information.

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