Marine Stewardship Council - Variation Request

Date submitted to MSC	May 14, 2018
Name of CAB	MRAG Americas
Fishery Name/CoC	South Australia Sardine Fishery
Certificate Number	
Lead Auditor/Programme	Richard Banks/Amanda Stern-Pirlot
Manager	
Scheme requirement(s) for	FCR 7.4.14.2 - Allow fish or fish products considered as coming from
which variation requested	IPI stocks to enter chains of custody, with an exemption to the
	additional assessment requirements for IPI stocks given in PA4.2.
Is this variation sought in	Yes.
order to fulfil IPI	
requirements (FCR	
7.4.14)?	

1. Proposed variation

This variation request is referred to allow entering IPI stocks in the MSC chain of custody, in accordance to FCR 7.4.14.2. if the current assessment of South Australia sardine results in a successful certification.

2. Rationale/Justification

The assessment team identified that Maray (*Etrumeus jacksoniensis*), which is similar looking and from the same Family (Clupeidae) as the target species Australian sardine (*Sardinops sagax*), was occasionally harvested along with the target species during purse seine fishing. The two species can only be distinguished visually by a trained eye, and the volumes of catch being harvested and processed at once precludes separation of these species. Unpublished, fishery-independent data from catch samples taken from 2009 to 2015, provided by the scientific agency South Australian Research and Developed Institute (SARDI), indicate that maray comprise around 1.0% of total catches for the fishery. In accordance with FCR 7.4.14.2, MRAG Americas is requesting to allow these fish to be considered as coming from IPI stocks to enter into chains of custody, with an exemption to the additional assessment requirements for IPI stocks, a detailed and substantiated rationale is provided in Section 6. This variation request does not alter the conformity of the applicant in relation to the relevant MSC standard.

3. Implications for assessment (required for fisheries assessment variations only) No implications for this assessment other than those pertaining to the inclusion of the IPI species, maray.

4. Have the stakeholders of this fishery assessment been informed of this request? (required for fisheries assessment variations only)	Yes
5. Further Comments	
The Client, Management authority and science pro	vider have been consulted on this through direct
communication by telephone. The CAB has also with	ritten to the eNGOs with concern in this fishery. No
complaints have been forthcoming.	

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6. Inseparable or practicably inseparable (IPI) catches		
Is this request to allow fish or fish products from IPI stocks to enter into	Yes	
chains of custody?		
The South Australian Sardine Fishery (SASF) operates primarily in coastal waters at the entrance to		

Spencer Gulf, South Australia (Ward et al 2017). Sardine is the dominant small pelagic species in the region. The vast majority of the fishery's catch is fed to bluefin tuna in nearby aquaculture pens. Data from catch samples collected by fishery-independent observers from 575 hauls between 2009 and 2015 demonstrated that maray comprised 1.0% of total abundance (Table 1, 7.4.13.1c). Because maray and sardine (which comprised 98% of total abundance) are the same body shape and school in the same size classes, abundance reflects total weight. Maray were only observed on 22 of the 575 totals hauls. On 6 of these 22 occasions maray comprised >50% of the abundance for that haul and on the other 16 occasions only a few maray were caught. In 3 of 7 years no maray were caught.

Table 1. Descriptive statistics from catch samples collected by observers showing the abundance of maray caught between 2009 and 2015.

Year	Hauls sampled	total fish count	sardine count	maray count	%abundance of maray
2009	140	5644	5523	184	3.3%
2010	183	9855	9788	34	0.3%
2011	48	2456	2445	0	0.0%
2012	51	2987	2984	41	1.4%
2013	41	1612	1607	0	0.0%
2014	43	1928	1925	0	0.0%
2015	69	4257	4208	26	0.6%
Totals	575	28739	28480	285	1.0%

Maray are not a desirable species to catch because they have an inferior oil content to sardines, however because they are difficult to separate from the catch they are one of only five permitted species for the fishery (the others are Sardines, Anchovy, Sandy Sprat and Blue Sprat). Again, because of an inability to separate them from sardines, maray catches are included as a part of the overall sardine TACC. There are two reasons why these species are difficult to separate. Firstly, they are practically indistinguishable as they have the same body shape and size as the target sardines. Only a trained eye can distinguish them when first caught, (Figure 1, 7.4.13.1a) particularly when the total catch is very high volume. Secondly, the nature of the fishery as a high volume, primarily fish food product means that it is not practical or feasible to separate them from the sardine catch (7.4.13.1b).



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Maray are broadly distributed throughout Australian waters from Bundaberg in Queensland through all southern Australian waters to Carnavon in Western Australia¹. Their primary habitat is deeper offshore waters where they form dense shoals and they are only occasionally found in coastal or estuarine waters ¹ (i.e. where the sardine fishery operates). As such, the probability of the sardine fishery encountering maray is relatively rare and this is confirmed by the catch data in Table 1. Further, like most clupeids maray are highly productive and recruitment success is likely to be strongly influenced by the environment. There are no commercial fisheries for maray in Australia. On this basis, it is considered highly likely that the maray stock is above biologically based limits.

Maray is not an ETP species (7.4.13.1d).

Therefore, in accordance to FCR 7.4.13.1(a,b,c,d), maray *Etrumeus jacksoniensis* is considered an IPI stock. Relative to FCR 7.4.13.1(e), we confirm that maray is also not a stock that is currently separately MSC certified.

Is this request to allow an exemption to detailed requirements for IPI	Yes
stocks?	

As described above, maray are only occasionally caught by the SASF and maray comprised only 1.0% of the total abundance observed from 575 hauls conducted over a seven-year period. Because maray and sardines have the same body shape and school in the same size classes, the assumption that abundance is representative of total weight of the catch is robust. Sardine comprise 98% of the total abundance of the catch and the remaining 1% of catch that is not sardine or maray comprises up to 9 different species that are all considered as minor species. Given the high productivity of maray, their predominately offshore distribution, and the low likelihood of the sardine fishery encountering this species, it is considered highly likely that the sardine fishery does not create a significant impact on the IPI stock as a whole. Based on the above MRAG Americas considers that IPI stocks, in addition to 7.4.13.1, also fulfil requirement 7.4.14.2 (i) and (ii). Thus, a request is being addressed to MSC in order to allow those IPI stocks to enter chain of custody with an exemption to the additional assessment requirements for IPI stocks given in PA4.2.

References:

Ward T. M., Smart J. and Ivey, A.R. (2017). Stock Assessment of Australian Sardine (*Sardinops sagax*) off South Australia 2017. Report to PIRSA Fisheries and Aquaculture. South Australian Research and Development Institute (Aquatic Sciences), Adelaide. SARDI Publication No. F2007/000765-6. SARDI Research Report Series No. 971. 107pp.

¹ Dianne J. Bray, *Etrumeus jacksoniensis* in Fishes of Australia, accessed 12 May 2018, http://fishesofaustralia.net.au/home/species/2052

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