

Marine Stewardship Council - Variation Request

Date submitted to MSC	24/04/2018
Name of CAB	Bureau Veritas Certification Holding SAS
Fishery Name/CoC Certificate Number	DERIS S.A – Pesca Chile- Antarctic Krill Fishery / Fishery still under assessment
Lead Auditor/Programme Manager	Jose Rios
Scheme requirement(s) for which variation requested	FCR 7.4.14.2 - Allow fish or fish products considered as coming from 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 order to fulfil IPI requirements (FCR 7.4.14)?	Yes. See above.

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.	
2. Rationale/Justification	
<p>The assessment team identified that fingerlings and juveniles of several fish and non-fish taxa are caught and processed together with Antarctic krill to obtain full fat dried krill. Different sources of information agree in estimating that they only represent between 0.1-0.2% in volume of total catches of the fishery. In accordance with FCR 7.4.14.2, Bureau Veritas is requesting to allow those fish and non-fish taxa 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 given un PA4.2.</p> <p>As required by MSC in the case the variation request is referred to IPI stocks, a detailed and substantiated rationale is provided in Section 6.</p> <p>Current variation request does not alter the conformity of the applicant or certificate holder in relation to the relevant MSC standard. The fishery remains consistent with the standard.</p>	
3. Implications for assessment (required for fisheries assessment variations only)	
Not applicable	
4. Have the stakeholders of this fishery assessment been informed of this request? (required for fisheries assessment variations only)	No
5. Further Comments	
No further comments	

6. Inseparable or practicably inseparable (IPI) catches

Is this request to allow fish or fish products from IPI stocks to enter into chains of custody?

Yes

A small percentage of the catches from the midwater trawl fishery targeting Antarctic krill in CCAMLR subarea 48 is comprised by several fish and non-fish taxa which are caught together with the krill. Due to their small size (modal size class of <10cm, similar to the krill length-frequency distribution), low frequency of occurrence and minimal percentage in volume (between 0.1-0.2%), it is not commercially feasible to separate them from the krill catch. They can only be detected and identified through observer's sampling (within the CCAMLR area there is a Scheme for International Scientific Observation –SISO- which, among other tasks, is commissioned to perform bycatch samplings). Two comprehensive reviews on fish-bycatch occurrence and species composition have been recently performed by two CCAMLR Working Groups: the working group for Ecosystem Monitoring and Management (WG-EMM) and the Working Group on Fish Stock Assessment (WG-FSA).

The report WG-EMM-14/31 and subsequent WG-FSA-16/04 provided an update on the fish by-catch in the krill fishery using data from SISO and from the commercial fleet to examine the frequency of occurrence (FOO), proportion by mass, length-frequency distribution and geographic provenance of the key fish taxa reported. A total of 9,303 hauls collected on 60 cruise involving 18 different vessels over the period 2010-2014 were analysed to elaborate the report WG-EMM-14/31. While for the most recent WG-FSA-16/04 updated this study using 2014-2016 data on fish by-catch in the krill fishery from commercial catch data (95,513 hauls) and CCAMLR SISO data (11,875 hauls). Both studies show similar results, in terms of species composition and frequencies of occurrence. For instance WG-FSA-16/04 estimated that total annual mass of fish bycatch in a 300,000 tonnes krill fishery would be 370 tonnes (**meaning 0.12% of total catch in volume**), comprising 50% mackerel icefish (*C.gunnari*) and 30% the Nototheniid (*L.larseni*).

As part of the fishery assessment the assessment team analysed different sources information (WG-FSA16-04, WG-EMM-14/31, Hønneland et al 2014, Hønneland et al 2015, Arana and Rolleri 2017, and observer's data collected on board the assessed vessel) in order to compile the most comprehensive list of bycatch taxa. A total of 73 taxa (66 fish taxa, 2 mollusc taxa, 3 crustacean taxa, 1 salp taxa, and 1 jellyfish taxa) were identified and assessed under P2. Only the mackerel icefish (*C.gunnari*) was assessed as Minor Primary species, while all the others were assessed as Minor Secondary species. No ETP species were found.

Therefore, in accordance to FCR 7.4.13.1 (b, c, d, e) those catches shall be recognized as IPI stocks.

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

Yes

As explained above the catch proportion of IPI stocks is much lower than 2% (it is estimated to be around 0.1-0.2%) and the total catch of IPI stocks by the UoA does not create a significant impact on the IPI stocks as a whole (WG-FSA-16/04 estimated that total annual mass of fish bycatch in a 300,000 tonnes krill fishery would be 370 tonnes). All the bycatch taxa identified by the assessment team were assessed as Minor Primary species (*C.gunnari*) or Minor Secondary species (the remaining 72 fish and non-fish taxa) and outcome Performance Indicators achieved 80 (PI2.1.1.) and 100 (PI 2.2.1) respectively.

Based on the above the Bureau Veritas considers that IPI stocks, in addition to 7.4.13.1, also fulfill 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:

- Arana, P., Rolleri, R. 2017. Informe técnico: captura incidental de organismos marinos y mortalidad de aves y mamíferos marinos en la pesca de krill (*Euphausia superba*), en registros efectuados en el buque factoría “Betanzos” (2011 a 2016). Escuela de Ciencias del Mar. Pontificia Universidad Católica de Valparaíso. Valparaíso, septiembre 2017. Unpublished report.
- Hønneland, G. Revenga, L. and Payne, A. 2014. MSC Public Certification Report Aker Biomarine Antarctic Krill Fishery. Prepared by Food Certification International, Ltd. For Aker Biomarine Antarctic. Available at: <https://fisheries.msc.org/en/fisheries/aker-biomarine-antarctic-krill/@@view>
- Hønneland, G.; Payne, A.; Revenga, L.; Bekkevold, S. 2015. MSC Public Certification Report. Olympic Seafood Antarctic Krill Fishery. Available at: <https://fisheries.msc.org/en/fisheries/rimfrost-antarctic-krill/@@assessments>
- WG EMM-14/31. Update on the analysis of fish by-catch in the krill fishery using data from the CCAMLR Scheme of Scientific Observation. 8 July 2014. Preliminary version of the report prepared by the CCAMLR Secretariat
- WG FSA-16/04. Fish by-catch in the krill fishery:2016 update. 13 September 2016. Prepared by the CCAMLR Secretariat