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## MRAG Americas, Inc. PSPA Alaska Salmon MSC Variation Request

**Table 1 – Variation request**

1	Date submitted to MSC
	- Please note the MSC will usually respond within 14 days, but for complex variations, longer may be necessary. The MSC will keep you informed if it will take longer than 14 days.
	March 16, 2019
2	CAB
	MRAG Americas, Inc.
3	Fishery name and certificate number or CoC certificate number
	Alaska salmon, MRAG-F-0046, MRAG-F-0064
4	Lead auditor or program manager
	Amanda Stern-Pirlot
5	Request prepared by
	MRAG Americas, Inc.
6	Scheme requirement(s) for which variation requested
	In accordance with FCR v2.0 SC6, if IPI stocks are identified and are below the level of 5%, the CAB shall submit a variation request to allow fish or fish products to be considered as coming from IPI stocks to enter further chains of custody.
7	How many times has a variation for this requirement been accepted for the same assessment of the same fishery?
	- e.g. Fill in 2 <sup>nd</sup> if a previous extension request on the 60 days requirement for surveillance reports has been accepted, and this request is for an additional time extension on top of that.
	<b>0</b>

<b>Table 2 – Variation justification</b>	
1	Proposed variation
	<ul style="list-style-type: none"> <li>Please describe how the CAB proposes to vary from the requirement including, where required, any original deadline date, the length of additional time requested and the exact modified deadline date.</li> </ul>
	In accordance with FCR v2.0 SC6, if IPI stocks are identified and are below the level of 5%, the CAB shall submit a variation request to allow fish or fish products to be considered as coming from IPI stocks to enter further chains of custody.
2	Additional time requested
	Original deadline date
	Modified deadline date requested
	Length of additional time requested
3	Justification
	<ul style="list-style-type: none"> <li>Please explain in detail why the variation is requested and why the change is necessary. This helps the MSC decide whether the variation request should be granted.</li> </ul>
	According to MSC FCR v2.0 Section SC6 on IPI catches in salmon fisheries, salmon catches within a UoA shall only be considered IPI if they are not certified separately and are either a) non-target species (scored in P2, not P1) or b) non-local stocks of species targeted in the fishery but do not breed within the UoA and are not therefore normally scored as part of the SMU. The total combined proportion of any catches from IPI stocks do not exceed 15% of the total combined catches in the Unit of Certification (UoC). The IPI requirements apply in this case, such that the IPI stocks may be assessed under the retained species. Please see below for additional justification.
4	If a fishery assessment, implications for assessment
	<ul style="list-style-type: none"> <li>Please include any impacts on the assessment/certificate referencing any other requirements which may be affected.</li> <li>e.g. Timeline delays, stakeholder input.</li> </ul>
	N/A
5	If a fishery assessment, mitigation of the implication for assessment
	<ul style="list-style-type: none"> <li>Please include information on how the CAB proposes to mitigate any risks of the implications the change will have to the assessment.</li> </ul>
	N/A
6	If a fishery assessment, how many conditions does the fishery have and will their progress be affected (positive or negative)?
	N/A
7	What is the status of the current assessment?
	<ul style="list-style-type: none"> <li>Please include the latest version and timing of the report that has been prepared, and an indication when the next report is expected (e.g. the Client and Peer Review Draft Report has been sent to the</li> </ul>

	client and the peer reviewers on 7 June 2018. The Public Comment Draft Report is expected to be ready on 1 September 2018).												
	<b>FRD</b>												
8	Further comments												
	- Please include any further relevant information.												
9	If applicable, additional information added after MSC's request												
	<p><b>1. Southeast UoA</b></p> <table border="1"> <thead> <tr> <th>Unit of Assessment</th> <th>Sockeye</th> <th>Chinook</th> <th>Coho</th> <th>Pink</th> <th>Chum</th> </tr> </thead> <tbody> <tr> <td><b>Southeast</b></td> <td>Local P1, Some Non-Local IPI</td> <td>Local P1, Some Non-Local IPI</td> <td>Local P1, Some Non-Local IPI</td> <td>P1</td> <td>P1</td> </tr> </tbody> </table> <p>While some differences are evident in the contribution of specific stocks and regions, an average of the estimates is that 95% of the Chinook Salmon caught in the Southeast fisheries spawn outside the UoA. We have computed that for the years 2012 – 2016 the total catch was 1,413,245 Chinook Salmon weighing 19,684,787 pounds (whole weight) originated from outside the UoA. This represents 1.7% of the total salmon catch for these years. We note that IMM (2013) concluded that overall the catch of non-local salmon of all species in Southeast was about 1.2% of the total harvest and as such qualified for an exemption from the IPI requirements. However, such exemption does not exist in the current version of the salmon certification requirements. We treat the catch of Canadian, Washington and Oregon Chinook Salmon as non-local IPI. See Section 2.6 Principle 2 for more details on these stocks.</p> <p>The catch of Sockeye and Coho salmon in the Southeast U of A includes some fish that spawn in the Canadian portion of the transboundary Taku and Stikine Rivers. The Pacific Salmon Commission's Transboundary River Technical Committee provides estimates of the numbers of these fish caught in the Southeast U of A. Unfortunately, there is a significant time lag in publication of these estimates. We used the most recent 5 years of available data available (2011 to 2015) because the most recent 2 years data were not yet published. We think this is a reasonable approach because the catches are very small in relation to the total catch in the U of A. The average annual catch of 732,777 pounds for these years represents only 0.2 % of the annual catch in the U of A of which most (80% is Sockeye Salmon).</p> <p>The Treaty does not establish specific harvest sharing arrangements for Canadian origin Coho Salmon caught in Alaska. English et al. (2012) estimated exploitation rates in Alaska fisheries of 4%, 4%, 37%, 14%, 5%, 14%, 8%, 8%, 3%, and 3% for fish originating from B.C. areas 2E, 2W, 3, 4, 5, 6, 7, 8, 9, and 10, respectively, during 2006-2010. While no specific estimates of the number of Coho Salmon that spawn in B.C. harvested in the Southeast U of A were provided, we made a rough calculation based on estimated total run sizes and exploitation rates for the combined North-Central B.C. area. For these years, the estimated total run size was about 500,000 and the total exploitation rate was about 30%. Even if the Alaska fisheries were responsible for one third of the exploitation it would amount to only 50,000 fish or about 450,000 pounds which is less than 0.2 % of the annual catch in the Southeast U of A.</p>	Unit of Assessment	Sockeye	Chinook	Coho	Pink	Chum	<b>Southeast</b>	Local P1, Some Non-Local IPI	Local P1, Some Non-Local IPI	Local P1, Some Non-Local IPI	P1	P1
Unit of Assessment	Sockeye	Chinook	Coho	Pink	Chum								
<b>Southeast</b>	Local P1, Some Non-Local IPI	Local P1, Some Non-Local IPI	Local P1, Some Non-Local IPI	P1	P1								

**2. Yakutat UoA.**

Unit of Assessment	Sockeye	Chinook	Coho	Pink	Chum
Yakutat	Local P1, Some Non-Local IPI	Local P1, Some Non-Local IPI	Local P1, Some Non-Local IPI	P1	Non-target IPI

Sockeye, Chinook and Coho salmon caught in set net fisheries in the Yakutat UoA may originate from the Transboundary Alek River, Chinook Salmon caught in troll gear may originate from British Columbia, Oregon, Washington or the Columbia River. Chum Salmon are not targeted in the UoA. Chinook Salmon caught in the troll fishery were discussed in the Southeast UoA, however, some Chinook Salmon are caught in the Alek River set gill net fishery. The catch of Chinook and Coho salmon in the Alek set gillnet fishery for the period 2012 -2016 was 2,428 and 1,222 fish respectively (Zeiser and Hoffman 2017). Based on an average weight of 13.6 pounds for Chinook and 7.2 pounds for Coho, the total harvest was 33,021 lbs. and 8,798 lbs. The total harvest in Yakutat over this time period was 11,725,508 lbs. The catch of Chinook Salmon and Coho salmon in the Alek set net fishery comprised less than 0.3 and 0.1 percent respectively. We treat these catches as Non-local IPI. The catch of Sockeye Salmon in the Alek during this time period was 158,752 pounds and represents 1.4 % of the total catch in the U of A. The East River is the only consistent producer of Chum Salmon in the Yakutat area; however, Chum Salmon are not targeted because transportation costs are high and prices are low. Chum Salmon are also occasionally caught in Yakutat Bay. The total catch of Chum Salmon for the period 2012 -2016 was 42,767 lbs. and this represents 0.4% of the total catch. We treat these catches as non-target IPI.

**3. Copper – Bering UoA**

Unit of Assessment	Sockeye	Chinook	Coho	Pink	Chum
Copper - Bering	P1	P1	P1	Non Target IPI	Non Target IPI

In the previous assessment (IMM 2013) Pink and Chum salmon represented 2.1 % of the overall catch and were classified as IPI species. There is no escapement data for Pink and Chum in the Copper-Bering Uof A. The proximity of the Copper-Bering Fishery to an eastern entrance into Prince Willima Sound leads to a hypothesis that some of the fish may be of Prince William Sound origin. But no data we are aware of exists to test this hypothesis. For the years 2016 and 2017 the catch of 394, 900 pounds of Pink Salmon represented 2.2 % of the total catch in the U of A. In these same years the catch of 111,100 pounds of Chum Salmon represented 0.6% of the total catch in the U of A.

**4. Prince William Sound UoA**

Unit of Assessment	Sockeye	Chinook	Coho	Pink	Chum
Prince William Sound	P1	Non-Target IPI	Non-target IPI	P1	P1

In the PWS Scope Extension (MRAG 2017) Chinook and Coho salmon were classified as IPI species but were exempted from the IPI requirements. In recent years there have been significant hatchery releases of Coho Salmon (1.4 – 2.9 million) and small releases of Chinook Salmon (0.2 – 0.35 million). For the period 2012 – 2016 the commercial catch of both Chinook and Coho Salmon accounted for only 0.45% of the total catch. We treat these catches as Minor Primary Species.

**5. Lower Cook Inlet UoA**

Unit of Assessment	Sockeye	Chinook	Coho	Pink	Chum
Lower Cook Inlet	P1	Non-Target IPI	Non-target IPI	P1	P1

In the previous assessment (IMM 2013) Chinook and Coho salmon made up less than 0.1% of the total catch and were exempted from the IPI requirements. Historically, there were essentially no catches of either species in Lower Cook Inlet (Byerly et al. 1999). In recent years, there have been modest hatchery releases of Chinook Salmon (0.53 – 0.89 million) and modest releases of Coho Salmon (0.67 - 0.95 million). These

releases primarily benefit recreational fisheries. For the period 2012 - 2016 Chinook and Coho salmon made up 0.4 of the total catch. We treat these catches as Minor Primary Species.

#### 6. Upper Cook Inlet UoA

Unit of Assessment	Sockeye	Chinook	Coho	Pink	Chum
Upper Cook Inlet	P1	P1	P1	P1	P1

There are no IPI species in Upper Cook Inlet.

#### 7. Bristol Bay UoA

Unit of Assessment	Sockeye	Chinook	Coho	Pink	Chum
Bristol Bay	P1	P1	P1	P1	P1

In the previous assessment Coho Salmon were considered IPI species (IMM 2013) but were exempted from the IPI requirements because the catch averaged only 0.2% of the total harvest. However, a review of Bristol Bay Annual Management reports (for example Elison et al. 2015) shows that directed fishing is allowed in the Nushagak District when escapement data warrants, as such we treat Coho Salmon under P1 and there are therefore no IPI stocks in Bristol Bay.

#### 8. Yukon River UoA

Unit of Assessment	Sockeye	Chinook	Coho	Pink	Chum
Yukon River	No Catch	P1	P1	No Catch	P1

In the previous assessment, Sockeye and Pink Salmon were classified as IPI species (IMM 2003), but because catches were <0.1%, they were exempt from the IPI requirements. For the period 2012 -2016 there was no reported catch of either species in the Yukon therefore no IPI stocks in the Yukon River UoA

#### 9. Kuskokwim UoA

Unit of Assessment	Sockeye	Chinook	Coho	Pink	Chum
Kuskokwim	P1	P1	P1	P1	P1

In the previous assessment Pink Salmon were classified as an IPI species, but exempted from IPI requirements because catches averaged 0.155 (IMM 2013). For the period 2012 - 2016 there was no reported catch of Pink, Chinook, Sockeye or Chum Salmon. Therefore there is no IPI in the Kuskokwim UoA

#### 10. Kotzebue UoA

Unit of Assessment	Sockeye	Chinook	Coho	Pink	Chum
Kotzebue	No Catch	No Catch	No Catch	No Catch	P1

In the previous assessment, the catches of Sockeye, Chinook, Coho and Pink salmon were classified as IPI species but exempted for the IPI requirements because catches were 0.1 % of the catch. For the period 2012 -2016 the only reported catch was for Chum Salmon. Thus there is no IPI in the Kotzebue UoA

#### 11. Norton Sound UoA

Unit of Assessment	Sockeye	Chinook	Coho	Pink	Chum
Norton Sound	Non -Target IPI	No Catch	P1	P1	P1

In the previous assessment there were no IPI species identified in Norton Sound (IMM 2013). During the period 2012 - 2016 significant catches occurred for Pink, Chum, and Coho Salmon and these species are

therefore treated under P1. There was no reported catch of Chinook Salmon. The catch of Sockeye Salmon was 0.5% of the total harvest. We treat these as Minor Primary Species.

#### 12. Kodiak UoA

Unit of Assessment	Sockeye	Chinook	Coho	Pink	Chum
Kodiak	P1	Non-target IPI	P1	P1	P1

In the previous assessment, there were no IPI species identified in the Kodiak Area. During the last several years there have been extensive regulations in place to avoid the harvest of Chinook Salmon for conservation reasons. As such during this period Chinook Salmon can be classified as non-target IPI species. The catch of Chinook Salmon for the period 2012 -2016 was 0.1% of the total harvest. We treat these catches as Minor Primary Species.

#### 13. Chignik UoA

Unit of Assessment	Sockeye	Chinook	Coho	Pink	Chum
Chignik	P1	P1	Non target IPI	P1	P1

There were no IPI Species in Chignik in the last assessment (IMM 2013). Coho are identified as an IPI species in the Chignik Area during this reassessment period as catches average only 3% of the annual total. The commercial fishery in this area targets Sockeye, Chinook, Chum and Pink salmon.

#### 14. Alaska Peninsula and Aleutian Is UoA

Unit of Assessment	Sockeye	Chinook	Coho	Pink	Chum
Alaska Peninsula and Aleutians	P1	P1	P1	P1	P1

There were no IPI Species in Alaska Peninsula or Aleutians Area (IMM 2013) or in this reassessment period.