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**Sent by email**

Date: 15/06/2018

**Subject: Request for variation to the MSC Certification Requirement v2.0 FCR-7.4.13.1.e for Deris S.A. - Pesca Chile - Antarctic krill fishery**

Dear Macarena Garcia,

I write with reference to your submission on 06/06/2018 of a request for variation to the MSC Certification Requirement (CR) to allow:

This variation request is against FCR 7.4.13.1(e) so mackerel icefish from subarea 48.3 can be classified as IPI

As you are aware, the CR procedures relating to v2.0 FCR-7.4.13.1.e state:

7.4.13.1

The CAB shall only recognise stock(s) as being an IPI stock, where the inseparability arises because either:

AND

e. The stocks are not certified separately

These are integral to ensuring all MSC accredited Conformity Assessment Bodies operate in a consistent and transparent manner. The MSC intends that these requirements be met across all fisheries and CoC certificate holders, except in exceptional, well-justified circumstances, as part of the MSC programme.

**MSC notes the factors presented supporting your request, including:**

- The CAB concludes that 7.4.13.1.b is met - it is not commercially feasible to separate non-target catch from the target (P1) catch
- The CAB concludes that 7.4.13.1.c is met - the total combined proportion of catches from IPI stocks does not exceed 15% by weight of the total combined catches of P1 stock and IPI stocks for the UoA.
- The CAB concludes that 7.4.13.1 is met - the IPI stocks are not ETP species.
- The CAB concludes that 7.4.14.2.a.i is met - the catch proportion of IPI stocks is less than or equal to 2%, and the total catch of IPI stocks by the UoA does not create a significant impact on the IPI stocks as a whole.
- The amount of *C.gunnari* from subarea 48.3 contained in krill-based final products carrying the ecolabel is an undetectable trace.
- It is not operationally possible to avoid subarea 48.3 since this is the fishing ground used during winter, when the more southern grounds are covered by ice.
- The average duration of a fishing trip is around 60 days it is likely that, in the same trip, vessels move between different the fishing grounds searching for krill. It is not operationally possible to segregate catches from a particular subarea.
- All *C.gunnari* bycatches account for only 0.05-0.1% of total catches of the fishery. In this situation, the CAB considers that the promotion of this species for its P1 assessment is not appropriate.
- Certificate sharing with the existing certificated fishery targeting mackerel icefish in subarea 48.3 (the South Georgia icefish pelagic trawl) is not possible since the fishing gear is totally different.
- No concerns have been raised on the impact of the krill fishery on fish stocks by CCAMLR or any other



stakeholder.

**Given the rationale provided, the MSC is willing to grant a variation to the CR.**

If you have any questions regarding this response, please do not hesitate to contact the relevant Fisheries Assessment Manager for this fishery.

Marine Stewardship Council  
cc: Accreditation Services International