

## Change to use of Risk Based Framework (RBF) on the Pan Pacific yellowfin, bigeye and albacore longline fishery

Control Union Pesca (CU Pesca) would like to inform stakeholders that the RBF will now be triggered for PI 2.2.1 (Secondary Species Outcome).

Following the site visit, more information on the bait species and their respective quantities were provided by the client to the assessment team. For one species, amberstripe scad (*Decapterus muroadsi*), the volume of bait used by the fishery is sufficient to meet the definition of a main secondary species. Given there are no analytically determined or empirical reference points for *D. muroadsi*, the RBF has been triggered and a Productivity Susceptibility Analysis (PSA) is therefore required.

The CU Pesca team intends to complete the PSA remotely. This is contrary to the associated guidance of GPF2.1 of the MSC FCRs: “The announcement of the use of the RBF should be done when the fishery assessment is first announced. The CAB may decide to trigger the RBF for a scoring element after the fishery announcement; however, this will require additional communication to stakeholders prior to the site visit. **Moreover, if the RBF is triggered during or after the site visit this will require an additional site visit to be scheduled**”.

Under ‘Auditability’ in the MSC Fisheries Certification Requirements (FCRs), guidance is not directly auditable. “It is, however, expected that the critical guidance identified in this document (FCRs v2.0) will be followed by CABs where applicable unless there is a justification for not doing so”.

Therefore CU Pesca’s rationale for the remote completion of the RBF for PI 2.2.1 and not following guidance is thus: given the MSC interpretation on use of the RBF for bait species from a data-poor fishery (extract from <https://mscportal.force.com/interpret/s/article/Assigning-bait-category-in-FCR-v2-0-plus-RBF-and-cumulative-considerations-FCR-v2-0-SA-3-1-7-SA-3-4-2-GSA-3-4-2-1527262006141>):

“If the bait fishery supplying the UoA is a data-poor fishery and the RBF needs to be applied, the team may need to somehow estimate the susceptibility attributes for the PSA without the normal contributions of local stakeholders at the on-site visit. Reasonable precaution should be applied by the team in this situation. Remote approaches may be possible to gain information from stakeholders (e.g. by phone conference etc.), but any extra uncertainties generated in such process should be allowed for in scoring. Teams should clearly state the approaches they intend to use for such RBF assessments in these situations, and document the results fully in the assessment reports.”

Given the fact that bait (*D. muroadsi*) is supplied by the Indonesian fishery, any on-site visit with RBF-workshop would likely need to be held in Indonesia. Considering the logistical difficulties and time delays associated with organising a new site visit in Indonesia, and as the RBF is for one species only, the team considered it more appropriate to conduct the susceptibility component of the RBF remotely. Relevant stakeholders would be contacted to gather the required information, in line with

PF 2.1 and PF2.2. Stakeholders would also still be given the opportunity to meet the assessment team in person should they wish.

Further information on this fishery can be seen on the MSC's website here: <https://fisheries.msc.org/en/fisheries/pan-pacific-yellowfin-bigeye-and-albacore-longline-fishery/@assessments>

CU Pesca is happy to receive comments from stakeholders on this change or on the assessment of this fishery. All interested stakeholders are encouraged to contact Kat Collinson ([kcollinson@controlunion.com](mailto:kcollinson@controlunion.com)) or Charlotte Gwyther ([cgwyther@controlunion.com](mailto:cgwyther@controlunion.com)) at CU Pesca by email, telephone or post at the below number and address:

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Please note that comments should be factual and should be supported by data or other evidence. Comments may remain unattributed. Furthermore, information that cannot be shared with any other stakeholder will not be referenced in the assessment and cannot be used in determining the outcome of the fishery's assessment nor used as a basis for an objection. Information can be kept confidential if it is restricted to financial transactions about certification, the financial affairs of individual companies or information that may lead to this information being known, or information that is the subject of relevant national privacy or data protection legislation in the assessed fishery's country.

Submitted by: Charlotte Gwyther

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**Deadline for stakeholder comment: 25<sup>th</sup> October 2018 at 17:00 GMT**