

Intent to Undertake an Expedited Assessment

MEC would like to announce the intent to conduct the expedited audit for an extension of scope to the SARPC Toothfish fishery, fishing off Kerguelen Island by demersal longline (MEP-F-018), to include an additional UoA; the SARPC Crozet toothfish fishery.

To support MEC's proposal for an expedited audit of the SARPC Crozet toothfish fishery, a gap analysis was carried out (see appendix 1), assessing the degree of overlap between the Kerguelen toothfish and Crozet toothfish fisheries. Note that the vessels and companies are exactly the same for both UoAs. The gap analysis revealed that the expedited assessment would involve a full assessment of Principle 1 Performance Indicators (PIs) for the Crozet UoA. Considerable overlap is expected for Principle 2 and Principle 3 PIs, so a review of up to date information and data will be conducted for both principles. Where required, the appropriate PIs will be rescored for the Crozet UoA.

The two fisheries use the same fishing gear. In addition, the habitat types and ecosystem system are anticipated to be extremely similar. It is also likely that the retained and discarded and ETP species will be very similar. Principle 3 is considered to be in common with the two fisheries. The legal framework and local management are governed by the same process/organisations (TAAF and CCAMLR).

The expedited assessment will be conducted against the v1.3 assessment tree, as per FCR 7.22.3, as the original assessment was completed against this version. According to the outcome of the gap analysis, a full assessment of Principle 1 Performance Indicators will need to be completed. Principle 2 and 3 will be reviewed and updated as appropriate. The only implications anticipated, relate to the condition that was stipulated as per variation request that was granted for the expedited audit to take place (see appendix 2). This requires that the team selects the main bycatch/retained species and ETP species on the basis of the data available in the Crozet fishery (not just assuming they will be the same as the Kerguelen toothfish fishery).

Appendix 1: Full Gap Analysis

Gap Analysis for the New Proposed Unit of Assessment for SARPC Toothfish

To support MEC's proposal for an expedited audit of the SARPC Crozet toothfish fishery, a gap analysis was carried out, assessing the degree of overlap between the Kerguelen toothfish and Crozet toothfish fisheries. Note that the vessels and companies are exactly the same for both UoAs. The gap analysis revealed that the expedited assessment would involve a full assessment of Principle 1 performance indicators for the Crozet UoA. Considerable overlap is expected for Principle 2 PIs and up to date information and data will therefore be reviewed. Where required, the appropriate PIs will be rescored for the Crozet UoA. For Principle 3, most of its elements will be held in common between both UoAs and this will therefore only require a review/update of the available information.

Component	UoA Fishery 1 - Toothfish, Kerguelen	UoA Fishery 2 – Toothfish Crozet
P1 Outcome	Toothfish, Kerguelen (CCAMLR area 58.5.1)	Toothfish, Crozet (CCAMLR area 58.6) These are different stocks and a full evaluation of the P1 outcome component will be carried out.
P1 Harvest strategy	Management by TAAF under CCAMLR framework	Management by TAAF under CCAMLR framework There will be considerable overlap between the harvest strategies and harvest control rules for both UoAs. The harvest strategy PI (1.2.1) will therefore only need a review/update. The other PIs under this component will require a full evaluation.
P2 Retained species	Main retained species identified were grenadiers (<i>Macrourus carinatus</i> mainly) and rays (<i>Bathyraja irrada</i> , <i>B. eatonii</i>)	It is likely that main retained species and associated management and information will be the same. This component will therefore involve a review of up to date logbook and observer data.
P2 Bycatch species	Main bycatch species identified was <i>Antimora rostrata</i>	It is likely that main bycatch species and associated management and information will be the same. This component will therefore involve a review of up to date logbook and observer data.
P2 ETP species	Fishery interacts with grey petrels, white-chinned petrels and orcas	It is likely that interactions with ETP species and associated management and information will be the same. This component will therefore involve a review of up to date observer data.
P2 Habitat	Gear – demersal longlines and a few experimental pots; habitats various Antarctic hard- and soft-bottom substrates	The gear and habitat types will be the same. This component will therefore involve a review of the available information on habitats. This component will therefore involve a review of up to date information on habitats.
P2 Ecosystem	Broader ecosystem – Southern	Ecosystem in which the fishery

	Indian Ocean / Southern Ocean	operates is the same. This component will therefore involve a review of up to date information on the ecosystem.
P3 Governance and policy	Legal framework by TAAF/CCAMLR.	Principle 3 is considered to be in common between Crozet and Kerguelen and therefore does not need additional review, although the PIs for P3 will be reviewed in relation to Crozet to address minor differences (an example might be in the frequency of marine patrols in relation to 3.2.3, and the extent to which cooperation with other fisheries (such as the HIMI Australian fishery) is applicable. The review will ensure that conclusions are up to date.

Annex 2: MSC Response to the Request for Variation from the MSC Certification Requirement 7.22.1.1

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Sent by email

Date: 9 April 2015

Subject: Request for variation to the MSC Certification Requirement FCR 7.22.1.1 for SARPC Toothfish

Dear Vicki,

I write with reference to your submission on 8 April 2015 of a request for variation to the MSC Fisheries Certification Requirement (FCR) to allow for a scope extension audit to take place for the addition of the Crozet toothfish stock to the existing SARPC toothfish certificate, despite this stock not previously having been assessed as under Principle 1 or 2 in the initial assessment process.

As you are aware, the CR procedures relating to scope extensions 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 in your letter supporting your request, including:

- The two toothfish stocks are considered distinct from one another with no geographical overlap or mixing, but that there will be considerable overlap for Principles 2 and 3.
- Considering the overlap in both Principle 2 and Principle 3 for both Kerguelen and Crozet UoAs, the integrity of the MSCs principles and criteria will be maintained.
- A full gap analysis has been undertaken and will be posted as part of the statement to the MSC announcing its intent to undertake an expedited audit for scope extension.

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- During this gap analysis, it was identified that a full reassessment of Principle 1 performance indicators for Crozet UoA is needed, alongside a review of up to date information and data for both Principle 2 and Principle 3. Any appropriate PIs be rescored for the additional Crozet UoA.

Given the rationale provided, the MSC is willing to grant a variation to the CR in this case subject to the following conditions:

- *That the team selects the main bycatch/retained species and ETP species on the basis of the data available in the Crozet fishery (not just assuming they will be the same).*

If you have any questions regarding this response, please do not hesitate to contact Stephanie Good, the Fisheries Assessment Manager for this fishery either by email stephanie.good@msc.org or phone +44(0)20 7246 8926.

Best regards,



Dan Hoggarth
Fishery Oversight Director

Marine Stewardship Council
cc: ASI, lead auditor