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## MRAG Americas, Inc.

# VA-Delta Kamchatka salmon fisheries (scope extension to include Pymta River salmon)

## MSC Variation Request

Table 1 – Variation request

1	Date submitted to the 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.
	August 12, 2019
2	CAB
	MRAG Americas
3	Fishery name and certificate number or CoC certificate number
	VA-Delta Kamchatka salmon fisheries (scope extension to include Pymta River salmon)
4	Lead auditor or program manager
	Amanda Stern-Pirlot
5	Request prepared by
	Amanda Stern-Pirlot
6	Scheme requirement(s) for which variation requested
	7.8.1.1. The [product] eligibility date shall be any nominated date on or between the publication date of the first Public Comment Draft Report and the certification date.

7	How many times has a variation for this requirement been accepted for the same assessment of the same fishery?
	0

**Table 2 – Variation justification**

1	Proposed variation	
	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.	
2	Additional time requested	
	Original <u>eligibility</u> date	Original eligibility date is July 30th
	Modified <u>eligibility</u> date requested	Requested eligibility date is July 11
	Length of additional time requested	19 more days of eligibility (to the beginning of the season)
3	Justification	
	<p>There is currently a scope extension underway to add Pymta River salmon to the existing valid certificate for VA-Delta Kamchatka salmon. The 2019 fishing season began on July 11 in the Pymta River, but the PCDR for this fishery was not published until July 30<sup>th</sup>. According to clause 7.8.1.1 the earliest eligibility date for product from the Pymta River would be July 30<sup>th</sup> and this is what is stated in the PCDR. However, there is no sustainability reason why fish from this fishery should not be eligible for the entire 2019 season, and it is very difficult for Pymta and Kamber companies to fill orders for salmon from 2019 with a small amount of product from the first three weeks of the season not eligible to be sold as MSC and everything else eligible. In addition, the “parent fishery” to which Pymta River is being added via scope extension, includes several other rivers in Western Kamchatka whose fish is already certified and which are managed collectively with the Pymta River. The chain of custody onsite visit to Pymta and Kamber plants took place before the start of the 2019 season on 1 and 2 July.</p>	
4	If a fishery assessment, implications for assessment	
	The implication is, if this VR is accepted, if/when the Pymta River salmon are certified via scope extension, Pymta and Kamber companies will be able to sell all of their 2019 season catch as MSC certified, and not have to somehow keep product from between 11 and 29 July separated.	
5	If a fishery assessment, mitigation of the implications for assessment	
	Mitigation is not really applicable in this situation.	
6	If a fishery assessment, how many conditions does the fishery have and will their progress be affected (positive or negative)?	
	This is not applicable; the variation pertains to product eligibility date.	
7	What is the status of the current assessment or audit?	
	The scope extension assessment is in PCDR stage with the current recommendation being to certify the Pymta River pink and chum salmon UoCs.	
8	Further comments	

	Please include any further relevant information.
9	If applicable, additional information added after the MSC's request