



Gabriela Anhalzer
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Sent by email

Date: 13/09/2019

Dear Gabriela Anhalzer,

I write with reference to your submission on 04/09/2019 of a request for variation to the MSC Certification Requirement (CR) to allow:

SCS is seeking this variation request per FCP 7.12.5a where the CAB shall 'Apply for and obtain a variation from the MSC to 7.10.3 before preparing the Announcement Comment Draft Report.'

The Yalu Estuary Manila Clam fishery is an enhanced HAC bivalve fishery that includes translocation.

The UoA for the enhanced hatch-and-catch (HAC) bivalve fishery consists of the following processes:

- Broodstock are selected from the commercial fishery targeting the wild Manila clam population in Fujian Province, eastern China.
- Broodstock are then induced to spawn in ponds where the Manila clam larvae settle out. The larvae remain in the ponds for a period of approximately four months¹, and once the Manila clam spat reaches a size of ≤ 2 mm, they are moved to nearby mudflats until they are reared to juvenile size.
- Juvenile Manila clams (4-10 mm) are harvested from the mudflats using hand sieves or towed nets and then bagged, ready for transport to Donggang, China.
- Juvenile Manila clams harvested from mudflats in Fujian Province are transported via truck (i.e. translocated) to Donggang, China.
- The juvenile Manila clams are placed into leased, subtidal grow-out areas that have been prepared for the clams.
- The Manila clams remain in these beds for 24-30 months until they are ready for market.
- At this point, all Manila clams from the leased areas are harvested using a clam dredge.

SCS proposes to vary from the requirement laid out in Annex SB for enhanced HAC bivalve fisheries by modifying the assessment tree to include the PI's related to translocation for Principle 2 (i.e., PI's 2.6.1, 2.6.2, 2.6.3) because of the translocation of the Manila clam seed (i.e. Manila clam seed is moved from Putian to Donggang). Manila clam is native to both Putian and Donggang.

As you are aware, the CR procedures relating to v2.1 FCP-7.10.3 state:

The team shall use the structure and the default set of Performance Indicator Scoring Guideposts in the default assessment tree as set out in the MSC Fisheries Standard (Annex SA) in all assessments, with the following exceptions

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:

- This modification to the SB assessment tree will ensure that the HAC assessment adequately



addresses/considers the potential genetic and other impacts that need to be assessed as a result of translocation.

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

- Follow the remaining requirements in FCP 7.12.5 for using a modified assessment tree.

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