

Marine Stewardship Council (MSC) Year 3 Surveillance Report

**Fishery for toothfish (*Dissostichus eleginoides*) -
Kerguelen component**

MEC-F-018

On behalf of SARPC

Prepared by ME Certification Ltd

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1. General Information

Fishery name	SARPC toothfish fishery				
Unit(s) of assessment	Species: Toothfish (<i>Dissostichus eleginoides</i>) Geographical range: TAAF EEZ Kerguelen Method of capture: Bottom-set longline Stock: Kerguelen toothfish stock Client group: Syndicat des Armements Réunionnais de Palangriers Congélateurs (SARPC) Other eligible fishers: none				
Date certified	3 rd September 2013	Date of expiry	2 nd September 2018		
Surveillance level and type	Surveillance level 6, on-site assessment				
Date of surveillance audit	7 th and 8 th November 2016				
Surveillance stage (tick one)	1st Surveillance				
	2nd Surveillance				
	3rd Surveillance	X			
	4th Surveillance				
	Other (expedited etc.)				
Surveillance team	Lead assessor: Chrissie Sieben Assessor(s): Sophie des Clers				
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2. Background

This report outlines the process and outcome of the third annual surveillance audit for the SARPC toothfish fishery. Note that at the time of the surveillance audit, an expedited assessment was ongoing for the addition of the Crozet stock to the certification scope (see <https://fisheries.msc.org/en/fisheries/sarpc-toothfish/@@assessments>). The Crozet stock was certified in December 2016. This surveillance is therefore for the Kerguelen component only.

The fishery is conducted by member vessels of the Syndicat des Armements Réunionnais de Palangriers Congélateurs (SARPC), a group of fishing companies based in La Réunion (see has replaced the SAPMER "Croix du Sud" through a leasing agreement (TAAF Décision 2016-80) for the fishing season 2016-17 (TAAF Décisions 2016-180, 2016-192)

Table 1 for a list of vessels). The certified fishery takes place in the EEZ of the Terres Australes et Antarctiques Françaises (TAAF - French southern and Antarctic lands) around the island of Kerguelen in the Southern Ocean. Fishing is by baited bottom set-longlines. Fishing is forbidden in territorial waters (12nm), waters shallower than 500m and in protected areas. Lines are set from 500 m down to ~2000 m depth and are deployed at night to mitigate bird mortality.

The SARPC fleet counts seven (7) longliner vessels. In March 2016, the Cap Bourbon Company newly built vessel "Cap Kersaint" replaced the "Cap Horn I" (TAAF Décisions 2016-82, 2016-111). During the 2015-2016 season, the COMATA fishing vessel experienced mechanical problems and 200 tonnes of its quota were transferred from the "Île de la Réunion" to "Cap Kersaint" and "Mascareignes III" (TAAF Arrêtés 2016-24, 2016-31) The "Cap Horn I" has replaced the SAPMER "Croix du Sud" through a leasing agreement (TAAF Décision 2016-80) for the fishing season 2016-17 (TAAF Décisions 2016-180, 2016-192)

Table 1. List of SARPC vessels from March 2016

	Vessel	Company	Type	IMO Number	Call Sign
1	Albius	SAPMER	Longliner	9245433	FPXK
2	Île de la Réunion	Comata	Longliner	9246970	FQBU
3	Cap Horn I	Cap Bourbon (chartered by SAPMER)	Longliner	9246968	FQBI
4	Cap Kersaint	Cap Bourbon (replacing Cap Horn I)	Longliner	9747601	FISH
5	Île Bourbon	Armements Réunionnais	Longliner	9245421	FOSP
6	Mascareignes III	Armas Pêche	Longliner	9245407	FOVB
7	Saint-André	Pêche Avenir	Longliner	9511181	FNTD

This fishery was certified by MEP on the 3rd September 2013 with 4 conditions. The conditions, as well as their status prior to the year-3 surveillance audit, are summarised in Table 2. A number of recommendations were also made as shown in Table 3. Progress against the conditions and recommendations is further discussed in Sections 4.1 and 0.

Table 2. Summary of Assessment Conditions and scoring and status prior to this audit.

Condition number	Performance indicator (PI)	Status	PI original score	PI revised score
1	1.2.4	On target	70	Not revised
2	2.1.1, 2.1.2, 2.1.3	On target	60, 70, 70	Not revised
3	2.3.1	On target	75	Not revised
4	1.2.2, 3.2.1, 3.2.2	On target	70, 75, 70	Not revised

Table 3. Summary of Assessment Recommendations and status prior to this audit.

Recom. number	Description	Status
1	PI 1.2.3: It is recommended that SARPC investigate the utility of equipping all the vessels with tag detectors, as is reported standard in the HIMI zone.	Closed at year 2 surveillance
2	PI 2.1.2: The team recommends that further information is sought, either from a desktop review or from field studies, on the survivorship of rays at Kerguelen after being cut off the line, to elucidate the apparent differences between Kerguelen and South Georgia, which could relate to the species mix, the ecosystem or fishing practices, or a mixture. On the basis of this information, the conservation strategy for rays could be reviewed.	Open
3	PI 2.3.2: It would be useful to evaluate the effectiveness of the measures to limit seabird mortality, and of individual vessels, in relation to grey petrels specifically, and if necessary refocus on those measures which reduce mortality of grey petrels in particular.	Open
4	PI 2.4.2: It is recommended that research be continued into the mapping of benthic habitats and the identification of VMEs at Kerguelen.	Closed at year 2 surveillance
5	PI 2.5.1: It is recommended that research into the Kerguelen ecosystem and the role of toothfish within it should continue.	Closed at year 2 surveillance
6	PI 2.3.1 It is recommended that SARPC compiles a summary table per fishing season indicating the quantities of bait used, by species and FAO stocks/ areas of origin, per year	Closed at year 2 surveillance
7	PI 3.2.2 It is recommended that TAAF/SARPC compiles a summary table per fishing season indicating the total number of hooks and the length of leaded lines (per fishing trip/campaign) lost during fishing operations	Closed at year 2 surveillance

Recom. number	Description	Status
8	PI 3.2.2 Effective decision making processes: It is recommended that TAC changes should apply to the season following CCAMLR meetings at the earliest.	Raised during year 2 surveillance - Open

2.1. Principle 1

2.1.1. Catch and TAC data

TAC and catch data for the most recent fishing season are given in Table 4. The 2015-2016 catch allocated to the fleet was 5,250 tonnes for Kerguelen (TAAF Arrêté 2015-100), with an additional 50 tonnes kept for discretionary allocation by the TAAF and eventually allocated between the fleet's 7 vessels (Arrêté 2015-124), corresponding therefore to a TAC of 5,300 tonnes. The TAAF notes (TAAF, 2016b) that catches of smaller juvenile fish, which are assessed through a test line and obligate a move-on rule, have decreased on the previous year.

Table 4. TAC and Catch data for SARPC Kerguelen toothfish fishery

	Fishing season	Volume (tonnes)
TAC	2015/16	5,300
UoC share of TAC	2015/16	100%
Total green weight catch	2015/16	5,323*
	2014/15	5,158*

* Catches are corrected by depredation from whales for the 2015-2016 season for the first time

The CASAL stock assessment model parameters have been updated following additional information from tag returns and from the age determination (ageing) studies undertaken both in the UK (Cefas) and in Australia. Analyses, using Kerguelen data where the fishery samples a wider depth range than the Australian fishery, have given a higher growth for juveniles, which increases the sustainability of the fishery. Tagging results have also showed that movements of tagged fish across the Kerguelen Plateau are smaller than originally assumed and could be considered negligible (Sinègre and Duhamel, 2016).

In accordance with the 60% B_0 target biomass set in the TAAF Management Plan, scientific advice recommended that the TAC be 5,050 tonnes for the 2016-2017 season in Kerguelen waters, which is consistent with the CCAMLR decision rules (FSA-WG preliminary version¹), and has been used by TAAF accordingly (TAAF Arrêté 2016-61).

The CASAL model is now developed enough to be used in simulations regarding TAC decisions (MSY and 60% B_0), therefore the stock assessment model is becoming an integral part of the

¹ <https://www.ccamlr.org/en/system/files/e-wg-fsa-16-v2.pdf>

scientific advice and of the management system. Furthermore, for the first time the TAC integrates explicit estimates of depredation (between 2% and 7% Gasco, pers. com. forthcoming CCAMLR paper). The Condition is therefore on course, and is expected to be closed by the next Surveillance audit, on the basis of CCAMLR 2016 documents that will be published in their final version in the Spring 2017.

2.2. Principle 2

The extension of the French TAAF National Protected Area by a 550,000 km² marine area (equivalent to the surface area of France TAAF, 2016a) was initiated from 2015. It has prompted a number of new projects to characterise the marine ecosystems around Kerguelen (Koubbi et al., 2016).

A large amount of work is also on going within the fishery regarding Kerguelen's marine ecosystem study and management, in particular:

- Mapping of sensitive habitats and benthos is an on-going collaboration between the MNHN and the University of Bourgogne from information collected by the COPEC on-board scientific observers (Alexis Martin).
- From Spring 2015, and throughout 2016, a new protocol for the COPEC (scientific observers) to describe and collect benthic samples on board the longliners on 25% of the line (also observed for all species and habitat interactions) has been implemented. In excess of 4,000 observations of benthos in Kerguelen waters have been collected and are currently being processed through photographic records and specimens brought back to the MNHN. The publication of results regarding habitat connectivity, including genetic analyses and underwater video description including of nursery areas, are expected in 2018 (with MNHN Concarneau). A move-on rule has been added to protect "bubble gum" corals.
- A photo-identification catalogue of tail flukes from sperm whales encountered in Crozet and Kerguelen established in 2014 is now routinely used by the COPEC during fishing operations in order to better quantify interactions between the fishery; especially depredation. Toothfish mortality from depredation was included in the stock assessment for the first time for the 2015/2016 season (Nicolas Gasco).
- A long-term (2005-2016) review of seabird incidental mortality in CCAMLR longline fisheries shows a dramatic decrease in bird mortality from the Kerguelen fishery with fewer than 50 birds (0.005 birds/thousand hooks) in 2015 from 340 in 2010 (CCAMLR, 2016). Efforts are kept up to decrease this further, although the persistent lack of effective cooperation between TAAF and fishing captains, for example through the C3P (TAAF, 2016b) probably slows the sharing of best practice.
- The IUCN and MNHN have published a Red list for vertebrate species for the TAAF and Nature Reserve (IUCN et MNHN, 2015), which gives the French protection status of all species of marine mammals and birds that interact with the Kerguelen fishery.
- A dedicated data server for TAAF fisheries-related and marine environment information (CCAMLR and SIOF waters) is expected at the MNHN in 2017.

- A second symposium on joint FR-AUS research on the Kerguelen Plateau is programmed to take place in Hobart, Tasmania (Australia) 13-15 November 2017.
- The next MNHN-led research cruise, POKER 4, is planned for August 2017.

Retained and discarded species

- A guide destined to the COPEC and fishing captains, of the main species caught incidentally by the toothfish fishery around Kerguelen (and Crozet) now complements the Best practice Guide of 2011, with 2013 sampling guidelines and 2014 detailed maps of grounds (depth, mat-long) of the “hot spots” with the largest catches of non-target species (Gasco et al., 2014).
- The observer-controllers bring a copy of the Guide with them on board and give a copy to the skipper, but in its present form (256 pages, e-copy 35 MB available from the TAAF offices) the Guide may need to be adapted for an easier access to the considerable information it contains.
- The TAAF did not present a summary table of catches in the minutes of their annual C3P meeting with the vessel skippers but note that catches are stable (TAAF, 2016b). Figures in Table 5 correspond to the catch statistics submitted to CCAMLR (2016a). They show that the tonnage caught has decreased since 2010 and that an increasing number of skates are released through the cut-off policy.
- The TAAF notes that overall catch rates for skates have remained constant over the years and that catch avoidance varies markedly between vessels. Further work is proposed to establish a strategy to decrease overall catches of rays in the coming fishing season. At the C3P and during the site visit, fishing company representatives suggested that the new strategy to be elaborated by TAAF is developed in collaboration through an open discussion with all fishing vessel captains. Transparency and collective action of the fleet would help share best practice between vessels and help obtain further overall improvements. Currently, vessel catch rates of non-target species estimated by the COPEC are kept secret by TAAF and only communicated to vessel owners to explain penalties and vessel quota reductions. The importance of transparency is examined with Condition 4 and Principle 3 – Management System.

Table 5 Reported catches (tonnes) of by-catch species taken in the toothfish fishery in the French EEZ in Division 58.5.1 (from CCAMLR 2016a unpublished)

Season	Macrourids	Rajids		<i>Antimora rostrata</i>
	Reported catch (t)	Reported catch (t)	Nb released alive	Reported catch (t)
2010	887	456	2	58
2011	860	437	535	52
2012	690	433	15878	26
2013	728	308	12455	67
2014	750	68	39727	75

- The impacts of the Kerguelen fishery on skates have been analysed in detail over the period 1997-2014 in collaboration with Australian colleagues for the HIMI fishery. The study concludes that, although survival rates from the cut-off policy are unknown, there appears to be little change in the abundance of the Kerguelen skate species as indicated by their catch rates in the toothfish fishery. Therefore, the CCAMLR fisheries conservation measures and marine reserves in the area “appear to provide effective protection for the skates ...” at least in the shallower waters where the trawl fisheries operate” (Nowara et al., 2017). Careful monitoring in the Kerguelen fishery is ongoing, together with the cut-off and move-on rule (Thibault Thellier). Efforts are kept up, to decrease catches further with a specific bycatch reduction plan to be devised in 2017, but the persistent lack of effective cooperation between TAAF and fishing captains, for example through the C3P (TAAF, 2016b) probably slows the sharing of best practice and identification of collective solutions.
- In order to have a Strategy and complete management measures of the fishery’s impacts on non-target species, the results of Nowara et al. (2017) in-depth analysis will need to be presented separately for the Kerguelen fishery, a baseline will need to be identified and the effect of separate management measures (cut-off, move on etc.) will need to be evaluated, probably in conjunction with other impacts (birds, marine mammals, habitats).

ETP species

The total number of birds observed to be dead or wounded during fishing operations was 18 (12 white-chinned and 6 grey petrels) for the 2015-16 season from 25% of all lines hauled by the fleet (TAAF, 2016b). Using a simple interpolation, this would amount to 72 birds in total for all lines set. These figures differ from those reported to CCAMLR in Table 6 because of the difference in season start dates. TAAF noted large remaining differences between vessels (from 2 to 6 birds) and a strong possibility that the crew under-reported observations on the 75% lines not observed, and therefore that improvements are possible. A preliminary analysis of interaction rates shows a peak in January, with some synchronicity with full moon, which may help further management (TAAF, 2016b).

Table 6. Number of birds killed and injured in the Kerguelen longline fishery (French EEZ Division 58.5.1, CCAMLR, 2016a)

Bird	Species	2014	2015
White-chinned petrel	<i>Procellaria aequinoctialis</i>	4	8
Grey petrel	<i>Procellaria cinerea</i>	0	0
Giant petrel	<i>Macronectes</i> spp.	2	4

Bait species

The SARPC monitors the species used as bait for their sustainability. The mackerel (*Scomber scombrus*) from FAO fishing area 21 (Northwest Atlantic), a stock in decline according to NOAA (2015), has not been used after 2014/2015.

2.3. Principle 3

The TAAF Management Plan for the fishery published in the Official Journal in August 2015 (TAAF, 2015) has been officially in force since 1st September 2015 (Arrêté 2015-102). The total number of longliners fishing in Kerguelen waters was fixed at seven (7) in January 2016 (Arrêté 2016-01), but an important modification was introduced in August 2016 (Arrêté N°2016-60) to change the number of vessels to “a maximum of seven vessels present in the zone at any given time” and on 15th September 2016, with the possibility to authorise an eighth vessel to fish, provided “it does not threaten the state of the stocks and respects the TAC from scientific advice” (Arrêté 2016-97). The possibility of a new entrant, unconnected to the SARPC, has dominated discussions between the SARPC, TAAF and the three Ministries involved in the management of the fishery (Environment, Foreign Affairs and Overseas Territories). A possible entrant (see submission from COPECMAP), who took part in an exploratory icefish fishery in 2016, was not retained. Then another vessel, the Corynthian Bay of the newly formed fishing company Réunion Pêche Australe, was awarded a quota of 80 tonnes in Kerguelen waters (TAAF arrêté 2016-99 16 September 2016) and started fishing at end of December 2016). The fishing companies currently in the fishery are determined to challenge the decision to authorise another entrant in the French Administrative Court.

This new development is worrying, in the sense that it could weaken the management system and specifically the legal framework (PI3.1.1) and the fishery's decision making system (PI3.2.2). There is already a condition regarding 3.2.2, with a specific Action Plan, against which great progress has been made, and which was assessed to be on target. Regarding 3.1.1, the TAAF-specific regulatory powers come with a transparent mechanism for the resolution of legal disputes, which is still considered to be effective. It is currently tested through a number of challenges from the fishing companies in the SARPC and another (see Annex 1 Stakeholders submission), and it is expected that TAAF will comply in a timely fashion with any judicial decision made. Therefore it was not deemed necessary at this time to re-score PI3.1.1. However, the quota allocation to a new entrant, although very small (80 out of 5 350 tonnes), may be in contravention with the published Management Plan and subsequent regulations (“arrêtés”). Therefore the situation will have to be monitored.

It would seem, however, that the TAAF are still fully committed to the provisions of the Management Plan to fix a TAC corresponding to a precautionary target biomass at 60% of the initial biomass (B_0) for the French EEZ. In addition, the TAAF confirmed that TAC changes would now systematically be made after CCAMLR meetings. Therefore, the TAC, fixed at 5,300 tonnes per year, will remain the same for the seasons 2016-17 and 2017-18.

The CROSS-RU is still in charge of fisheries surveillance, using two navy frigates and the old fishing vessel OSIRIS due to be replaced in 2017, together with satellite radar capacity, which is currently being upgraded. A previous agreement with the Australian Fisheries Management Agency ensured a full coordination of radar surveillance across the Kerguelen Plateau. This has recently stopped due to systems changes on both sides, the French system upgrading to a more powerful satellite-radar combination. A wider fishery surveillance initiative is currently discussed within CCAMLR. The risk of IUU fishing remains important with up to 30 sightings of foreign vessels active in the High Seas areas (CROSS Director, pers. Comm.), and there is still a very close cooperation with the SARPC vessel captains who signal any suspicious sightings or gear

in the French EEZ. The enforcement of Port State Measures is becoming increasingly efficient, with a recent seizure of toothfish landings by a Russian-flagged vessel in a Chinese port. There are no compliance concerns. The CROSS-RU also works with the TAAF-COPEC who are in charge of enforcement of the TAAF regulations.

TAAF provided the audit team with a copy of the C3P presentation this year, although the vessel owners didn't have one. The C3P meeting minutes have also been published (TAAF, 2016b). At the C3P TAAF present detailed information on individual vessel performances with respect to tag returns, catches of juvenile toothfish, skates, birds and the hook/line loss criteria etc. It is felt that more transparent and open discussions are needed with TAAF and MNHN scientists and vessel captains collectively, to develop best practice and help improve further individual and collective environmental performances of the fleet.

2.4. Traceability

There has been no change to the traceability system for SARPC products and all vessels in the client group have separate chain of custody certification (CoC). CoC recertification audits were on-going in November 2016, at the time of writing.

3. Assessment Process

The SARPC toothfish fishery (Kerguelen only) was certified on the 3rd September 2013. The initial assessment team consisted of Dr Jo Gascoigne (Team Leader, Principle 1), Terry Holt (Principle 2) and Sophie des Clers (Principle 3). The site visit for the assessment took place in Paris, France in February 2010.

Based on the relatively high risk level of this fishery, as well the number and nature of conditions to which the certification is subject, a surveillance level of 6 was awarded in accordance with the MSC FCR v2.0 (7.23.2). Level 6 is the maximum level of surveillance, requiring 4 on-site visits annually.

The year 1 surveillance audit consisted of an on-site audit held in La Reunion, France in August 2014 and was carried out by Sophie des Clers (Team leader) and Chrissie Sieben. Jo Gascoigne, team leader during the initial assessment, also contributed to the surveillance report. Overall, the fishery was considered on target although progress against condition 4 (Management plan) was behind target. The team raised two new recommendations.

The second surveillance audit equally took place in La Réunion, in September 2015, with team leader Sophie des Clers on site. Kat Collinson and Jean Claude Brêthes participated remotely. The fishery was considered on target overall and five recommendations were closed. One new recommendation was, however, raised.

The third surveillance audit took place in La Reunion on the 7th and 8th November 2016 with team member Sophie des Clers on site, supported off site by team leader Chrissie Sieben. Stakeholders were informed of the scheduled site visit, its time and location and the proposed audit team on the 4th October 2016. The audit was attended in person by the participants listed in Table 7 and meetings were organised through conference call or by telephone.

Table 7. Stakeholders met or interviewed by telephone and teleconference

Name	Role / organisation
Laurent Nicolle	SAPMER – SARPC contact person
Eric Cousin	SAPMER (QHSE)
Michel Beilloeil	SAPMER (skipper Ile Bourbon)
Jean-Pierre Kinoo	Cap Bourbon
Graziella Jan	Cap Bourbon
Tugdual Poirier	Cap Bourbon
Laurent Virapouillé	Pêche-Avenir SA
Laurent Pinault	Pêche-Avenir SA
Dominique Person	DMSOI CROSS Réunion, Directeur
Cédric Marteau	TAAF (DE), Direction de l'Environnement, Directeur
Vincent Kerzerho	TAAF (DPQM), Direction des Pêches et des Questions Maritimes,

Name	Role / organisation
	Directeur Adjoint
Anne-Gaëlle Verdier	TAAF (DE), Direction de l'Environnement, Directeur Adjoint
Thibaut Thellier	TAAF (DE)
Eléonore Guilbault	TAAF, Service Pêches
Clément Larrauri	TAAF (SA)
Prof. Guy Duhamel	Museum National d'Histoire Naturelle (MNHN, Team Director)
Romain Sinègre	Museum National d'Histoire Naturelle (MNHN – models)
Charlotte Chazeau	Museum National d'Histoire Naturelle (MNHN – data)
Nicolas Gascot	Museum National d'Histoire Naturelle (MNHN – data)
Alexis Martin	Museum National d'Histoire Naturelle (MNHN – VME)
Yannick Lauri	Président, COPECMA SAS

Harmonisation

At the initiative of the audit team in charge of the Australian Heard Island and MacDonald island toothfish fishery re-certification, a conference call was held on 11 Novembre 2016, before they finalised the 4th surveillance audit.

Sabine Daume Team Leader, Sandy Morison leading principle 1 and Sascha Brand-Gardener for principle 3 for the HIMI fishery and Sophie des Clers, for the SARPC fishery, participated.

Regarding Principle 1, only draft documents were available prior to CCAMLR's meetings, but it was felt that close collaboration between Australian and French fisheries scientists over the last five years had brought about a common fisheries assessment methodology. It was also noted that accumulating evidence from tagging studies pointed to very low mixing rates between the HIMI and Kerguelen stock components. Therefore HIMI Conditions on P1.2.1 and P1.2.2 would be closed, which brings the scoring in line with that of the SARPC fishery.

The Condition for P1.2.4 was also close for the HIMI fishery, while it remains open for the SARPC fishery. We discussed and agreed with the rational used by SCS for the HIMI fishery, which is as follows: "MSC Interpretation of harmonisation requirements for fisheries (16 December 2015) states that "P1 always considers the impacts of all fisheries on a stock, so any fisheries which have the same P1 species (stocks) should be harmonised." Nevertheless, we consider that the HIMI and SARPC fisheries are also harmonised for this PI to the extent that the impacts on the whole stock have been taken into account. The differences that remain are justified as they pertain to the fishery-specific aspects of their harvest strategies and these differences do not threaten the achievement of P1 outcomes. Therefore, as required by CI3.1, having differences in the conditions between the Australian and French fisheries would not "undermine the integrity of MSC fishery assessments". Separate scoring of these fishery-specific aspects of the harvest strategies is also consistent with the approach for fishery-specific management arrangements under P3."

The HIMI 4th surveillance audit report was published on 13 December 2016 (<https://fisheries.msc.org/en/fisheries/heard-island-and-mcdonald-islands-himi-toothfish/@@assessments>).

4. Results

4.1. Conditions

Progress against the conditions raised during the initial assessment are shown below. No new conditions were raised during this surveillance audit.

Table 8. Condition 1: Sustainable stock assessment process

Performance Indicator & Score	PI number	Scoring issue/scoring guidepost	Score
	1.2.4 – Stock assessment	a. The assessment is appropriate for the stock and for the harvest control rule.	70
Condition	By the end of the five-year certification period, the fishery must have in place a sustainable stock assessment process which i) evaluates the fishery with reasonable regularity; ii) is used to inform decisions about the level of the TAC by TAAF and other stakeholders and iii) is presented for regular review by CCAMLR WG-FSA.		
Milestones	<p>Year 1: Implement WG-FSA work plan. Start to put in place resources (financial and human) to ensure that the stock assessment process is sustainable.</p> <p>Year 2: Finalise the establishment of a sustainable, long-term stock assessment process, which will i) evaluate the resource on a regular basis; ii) provide the main input into scientific advice on management, notably the level of the TAC; and iii) work with CCAMLR WG-FSA and other bodies as appropriate.</p> <p>Year 3 and on going: Continue stock assessment process as integral part of fisheries management system</p>		
Client action plan	<ol style="list-style-type: none"> 1. Implement WG-FSA work plan (2012) and submit a report to WG-FSA 2013 and if necessary to WG-FSA 2014 in order to finalise the establishment of a sustainable, long term stock assessment model. By the end of Year 2 of certification. 2. Get the stock assessment model fully approved by CCAMLR scientific committee. By the end of Year 4 of certification. 3. Resources (financial and human) will be put in place to ensure that the stock assessment process is sustainable. By the end of Year 4 of certification. 4. Continue stock assessment process as integrate part of fisheries management system (including data from Poker 3). On-going basis - Poker 3 at the end of 2013. 		
Progress on Condition Year 1	<p>Since the fishery's certification, the MNHN has appointed a stock assessment specialist, on a full-time contract. No updated stock assessment was presented for toothfish in Kerguelen at the CCAMLR WG-FSA in October 2013. It was explained that the third POKER campaign (POKER 3) had only just terminated at that stage and that its biomass estimates would be incorporated into the stock evaluation for the following year.</p> <p>Some provisional results were presented at CCAMLR-FSA in 2013, however, following adjustments in the analysis in collaboration with Australian Heard Island fisheries scientists, in terms of the number of fisheries and seasons used, weighting of data according to the method of Francis and incorporation of biomass and length- frequency estimates following the POKER 3 campaign. The revised stock assessment model is to be presented at CCAMLR-FSA in 2014. Results were also presented and discussed by the MNHN with TAAF and with SARPC. This demonstrates that progress has been made against the CCAMLR WG-FSA work plan for a more robust stock assessment.</p>		

	<p>A regular collaboration between the MNHN and the Australian modellers through annual meetings since 2014 has led to significant progress in model development. The improved model presented at CCAMLR WG-FSA in October 2014, which incorporates data from the Poker3 research cruise. The FSA commended the work progress so far and found that the model could be used to provide short-term management advice. Points 1 and 4 of the Client action plan above are therefore met.</p> <p>The stock-assessment specialist at the MNHN has been recruited on a long-term contract, with a clear commitment from the French Ministry (DPMA) that the post is made permanent. Point 3 of the Action Plan is therefore met ahead of schedule.</p> <p>New model developments are to be presented at the CCAMLR meetings in October 2015, which include new Kerguelen-specific ageing data and simulations to evaluate harvesting scenarios. Point 2 is on schedule.</p> <p>To remain on target with the client action plan, the stock assessment process should be approved by WG-FSA as the basis for on-going (rather than just short term) scientific advice by audit Year 4 (i.e. CCAMLR meeting 2016, assuming audit timing remains the same).</p> <p>In relation to the milestones set by the MSC assessment team, Year 2 required '...the establishment of a sustainable, long-term stock assessment process, which will i) evaluate the resource on a regular basis; ii) provide the main input into scientific advice on management, notably the level of the TAC; and iii) work with CCAMLR WG-FSA and other bodies as appropriate'. This is essentially met, as noted above. However, the audit team were concerned about how the scientific advice feeds into the TAC-setting process (point ii) – notably the lack of transparency around how TAAF sets the TAC and allocates individual quotas. It appears to the team that the MNHN analysis is mainly used as a post-hoc process to check that the TAC set by TAAF is within sustainable limits, rather than as an upfront basis for deciding what the TAC should be. This has not, for the moment, impacted on the sustainability of the fishery, however (although it is not ideal), and hence is more a question related to Condition 4 (harvest control rules and tools, decision-making process) and is discussed further in that context.</p>
Progress on Condition Year 3	Progress has been steady, the condition is on target with the client action plan. The new stock assessment model and process in general is increasingly similar to that used by the Australian scientists to provide scientific advice for the HIMI toothfish fishery. It has been approved by WG-FSA as the basis for ongoing scientific advice (CCAMLR meeting 2016 unpubl.). The condition should therefore be closed once the documents are published on the CCAMLR website by audit Year 4.
Status of condition	On target

Table 9. Condition 2: Systematic monitoring of grenadiers, rays and bycatch code of conduct

Performance Indicators & Scores	PI numbers	Scoring issue/ scoring guidepost	Score
	2.1.1	a. Main retained species are highly likely to be within biologically based limits c. If main retained species are outside the limits there is a partial strategy of demonstrably effective management measures in place such that the fishery does not hinder recovery and rebuilding.	60
	2.1.2	a. There is some objective basis for confidence that the partial strategy will work, based on some information directly about the fishery and/or species involved.	70

		c. There is some evidence that the partial strategy is being implemented successfully.	
	2.1.3	b. Information is sufficient to estimate outcome status with respect to biologically based limits. d. Sufficient data continue to be collected to detect any increase in risk level (e.g. due to changes in the outcome indicator score or the operation of the fishery or the effectiveness of the strategy)	70
Condition	<p>A monitoring system needs to be put in place for grenadiers and rays, appropriate to the scale of the fishery, which will provide indication of possible risks to the stock. This may be by analysis of trends in CPUE or by some other suitable method.</p> <p>The assessment team needs to see evidence of the systematic implementation of the code of conduct.</p> <p>A process of review and revision of the code of conduct in the light of trends in the fishery is required. Future iterations of the code of conduct should be more specific about management requirements, and circumstances under which vessels should move on, and these should be formalised in management regulations as required. The fishery should provide data on catch of rays and grenadiers at each annual audit.</p>		
Milestones	<ol style="list-style-type: none"> 1. Monitoring of grenadiers and rays: Year 1: Consult with MNHN on a monitoring systems for grenadiers and rays, including resource requirements. Year 2: Finalise and implement the monitoring system for grenadiers. Year 3 and on: Continue implementation. Review management as required in the light of monitoring results. 2. Implementation of code of conduct Year 1 and on: Provide evidence that the code of conduct is being implemented systematically by all SARPC members (e.g. examples of decisions taken, data on bycatch). 3. Review and revision of code of conduct Year 3: After two years of data, work with MNHN to review the results of the code of conduct in terms of reduction in bycatch rates. Year 4: Revise code of conduct as required in the light of monitoring and review results. 		
Client action plan	<ol style="list-style-type: none"> 1. Finalise the implementation of the monitoring system for grenadiers and skates by-catch - MNHN with data provided by TAAF observer collected on SARPC Fishing Vessels - Fully operational by start of Year 2 of certification. 2. Vessels moving on when high catches of bycatch species are obtained, avoiding hotspot areas - DPMA / TAAF observers - Fully operational by start of Year 2 of certification. 3. Assessment of the code of good practice in terms of reduction in by-catch rates. – MNHN - Fully operational by start of Year 3 of certification. 4. Revision of the code of good practise and issuance of conservative measures if necessary - MNHN, TAAF, DPMA, SARPC - Fully operational by start of Year 2 of certification. 		
Progress on Condition Year 1	<p>Monitoring system for bycatch is fully functional for grenadiers, rays and any other fish species, checked by observers (COPEC) on board each vessel. Code of conduct for rays/skate supplemented with CCAMLR picture identification of wounds signs and health state of rays to guide cut off decisions. Catch figures show a decrease of the two main species of ray caught by the fishery over the past three seasons. From season 2014/15, the cut off and move on rules are mandatory.</p>		
Progress on	<p>Monitoring systems are in place for all species groups, based on the detailed</p>		

Condition Year 2	<p>COPEC observation of 25% of the lines hauled. The 2011 MNHN Code of conduct has been supplemented by CCAMLR guidelines to cut off rays that may survive, and management measures have been adapted (TAAF, 2014). Observer data suggest that mandatory cut off and move on rules from 2014/15 may have reduced ray catches substantially (from 3.9 to 2.9 /1000 hooks), but a detailed analysis has not yet been done by MNHN.</p> <p>In terms of the client action plan, points 1 and 2 are met and progress against points 3 and 4 is on target. In terms of the milestones, the monitoring system is in place (point 1 – all milestones met); evidence of implementation of the code of conduct is provided by observer reports (point 2 milestone met).</p> <p>For the next surveillance audit, TAAF and MNHN will need to analyse all available information in terms of bycatch rate reduction, in order to evaluate the effectiveness of the code of conduct prior to any revision following on from Gasco and Duhamel (2011) (milestones point 3, client action plan, point 3).</p>
Progress on Condition Year 3	<p>Monitoring systems are in place for all species groups, based on the detailed COPEC observation of 25% of the lines hauled. The 2011 Code of Conduct has been complemented by compilations of catch rates of the main species on maps showing depth and area-specific hotspots in 2013 and 2014 (Gasco et al., 2014).</p> <p>For the next surveillance audit, a routine reporting format will be needed to monitor the impact of the fishery.</p> <p>An evaluation of the Code of Conduct and Guide has mostly been done but not presented as such and not yet published with the in-depth analysis of annual catch rates in collaboration with the HIMI fishery (Nowara et al., 2017). The data and analyses available suggest that, at its current level, the impact of the Kerguelen toothfish longline fishery on skates may be sustainable.</p> <p>In terms of the client action plan, points 1 and 2 are met and progress against points 3 and 4 is on target. In terms of the milestones, the monitoring system is in place (point 1 – all milestones met); evidence of implementation of the code of conduct is provided by observer reports (point 2 milestone met). The effectiveness of the Code of Conduct and Guide has been evaluated in part (point 3 milestone), and a Strategy to further implement the Code of Conduct is planned for 2017 (Year 4, point 4 milestone).</p> <p>On the basis of information soon to be published, the first two PIs could be rescored. Provided the TAAF can communicate information more transparently and develops more collaboration with the fishing vessel captains as a group, this condition is expected to be closed at the next audit.</p>
Status of condition	The condition is 'on target'.

Table 10. Condition 3: Targets and best practice for grey petrels

Performance Indicator & Score	PI number	Scoring issue/ scoring guidepost	Score
	2.3.1	b. The effects of the fishery are known and are highly likely to be within limits of national and international requirements for protection of ETP species - for grey petrels	75
Condition	Declines in bird mortality need to continue until all vessels are performing at the best possible level. There should be an improvement (decline) in bird mortality each		

	<p>year of certification, with a target at the end of Year 4 of certification of not more than 25 birds for each vessel, and/or an overall average of 20 birds/vessel at Kerguelen (all species combined). (Note: it is not possible to set quantitative targets for grey petrels specifically because the bycatch numbers are too small to make this realistic – this is explained in detail in the response to stakeholder comments, PCR Annex 6.)</p> <p>In addition, a monitoring system is required to identify the level of risk posed by the fishery to the Kerguelen grey petrel population, including specific bycatch targets for grey petrels.</p> <p>Figures for estimated bird bycatch by species and by vessel should be provided at each annual audit.</p>
Milestones	<p>Year 1: Continued implementation of bird action plan by all vessels. Establish system within SARPC to lower performing vessels to learn from best performers. Start discussion with TAAF and bird experts on requirements for monitoring and bycatch targets for the Kerguelen grey petrel population.</p> <p>Year 2: Implementation of bird action plan by all vessels. Finalise plan for grey petrel monitoring, and bycatch targets for grey petrels.</p> <p>Year 3: Implement monitoring programme, and evaluate population status and bycatch impacts. Revise bycatch targets as required.</p> <p>Year 4: If bycatch targets are not met, develop a second action plan, which identifies the main causes of on going bycatch and how to address them. Year 5 and on: Implement second action plan if required.</p>
Client action plan	<ol style="list-style-type: none"> 1. Continue implementation of bird action plan by all vessels. TAAF- SARPC On going process already started. 2. Establish system within SARPC with agreement of TAAF to allow lower performing vessels to learn from best performers. SARPC-TAAF In place by Year 2. 3. Continuation of the Assessment of the Kerguelen grey petrel population. Results will be presented to ACAP 2013 by Year 2 of certification and on going (TAAF). 4. Bycatch figures compiled and analysed by species and by vessel TAAF Year 1 and on going.
Progress on Condition Year 1	<p>On going implementation of the Action Plan by all vessels and detailed monitoring is in place and has shown a dramatic decrease of numbers of birds caught in the fishery during Year 1 of certification. Some sharing of best practice through C3P and between vessels takes place through SARPC.</p>
Progress on Condition Year 2	<p>In terms of measures, implementation by the vessels and reporting of results, the condition is way ahead of target, with continued low number of birds caught, below the quantitative targets set by the MSC team (at the insistence of stakeholders). The bird action plan is fully implemented according to observer reports, and is a mandatory requirement.</p> <p>In terms of grey petrels, DCPN monitor and report bird deaths and injuries by species, with no impacts on grey petrels amounting to 3 dead animals (reported) in the 2013-14 season. Quantitative targets have not been set, but the team accepted the argument that this level of mortality would be below any likely target (or maximum) levels.</p> <p>On this basis, the Year 1 and 2 milestones and action plan requirements have been met.</p>

	<p>Further progress may be limited by a lack of transparency regarding individual vessel results, which are only discussed with individual vessels by TAAF and not shared cooperative in discussions between vessel captains.</p> <p>The C3P does not currently allow for discussion and exchange of best practice between the best and least performing vessels. Results are briefly presented by TAAF, but SARPC would rather the discussion be more transparent and cooperative with TAAF DCPN and bird experts and openly between vessels. Furthermore, the basis by which TAAF 'rewards' good performing vessels with additional quota is unclear and un-transparent. In this respect, more analysis and a Task group process are needed to ensure that current results keep improving – as acknowledged by TAAF.</p>
Progress on Condition Year 3	<p>The bird action plan is fully implemented according to observer reports, and is a mandatory requirement. For grey petrels, TAAF through the COPEC systematically monitors and reports bird deaths and injuries by species. There was no mortality of grey petrels in the 2014-15 season, but 6 birds observed dead in 2015/2016, extrapolated to 80 for the all lines set.</p> <p>Vigilance will be strengthened in January and during full moon when most of the interactions with the grey petrels appear to take place.</p> <p>Further progress regarding all interactions with birds could be improved through more transparency regarding individual vessel performances, which are currently not openly shared by TAAF to elicit collective discussions with and between all vessel captains.</p>
Status of condition	The condition is 'on target'.

Table 11. Condition 4: Fishery management plan

Performance Indicators & Scores	PI numbers	Scoring issue/ scoring guidepost	Score
	1.2.2	Harvest control rules and tools	70
	3.2.1	Fishery-specific objectives	75
	3.2.2	Decision-making processes	70
Condition	Produce a management plan for this fishery, focusing on the management of the toothfish resource (i.e. Principle 1). The plan should set out for the short- term (~5-10 years), i) the objective of management; ii) how that objective will be achieved; i.e. the harvest control rules which control how decisions on the TAC will be taken, iii) what information will be used and how it will be used and iv) how the management plan will be evaluated, reviewed and revised on an on going basis. The management plan should be available to stakeholders on a transparent basis.		
Milestones	<p>Year 1: Consultation on management plan between SARPC, TAAF and MNHN. Methods and means for drafting plan agreed.</p> <p>Year 2: Draft plan and present for review to stakeholders.</p> <p>Year 3: Finalise plan.</p> <p>Year 4 and on: Implement plan.</p>		
Client action plan	1. Finalising and approving the plan of management of the fishery, which is based		

	<p>on the draft memo issued by TAAF. By the end of Year 2 of certification Draft management plan and Year 3 Final management plan.</p> <ol style="list-style-type: none"> 2. Assess the implementation of the Management plan as stated by the TAAF and approved by all stakeholders By the end of Year 4 of certification. 3. Review and improvement of the management plan by Year 5 of certification
Progress on Condition Year 1	<p>Significant progress has been made on developing the stock assessment model (condition 1) with the Australian scientists providing scientific management advice for the HIMI stock of the Kerguelen Plateau. Once this step is validated at the forthcoming CCAMLR 2014 meeting, a Fisheries Management Plan will be produced. It will bring together existing elements in a coherent and comprehensive manner.</p> <p>Progress against this condition is behind target. New sets of conservation measures to strengthen management have been introduced but consultation on the management plan has not been initiated. Information presented at the 2014 C3P meetings does not correspond to MNHN analyses on the state of stock.</p> <p>To stay on target, the following will need to be finalised before the next surveillance audit:</p> <ul style="list-style-type: none"> • Harvest control rules, which control how decisions on the TAC will be taken; • Communication of information used and the rules of the vessel quota allocation formula, publicly available summary data tables for toothfish, main retained, discarded and ETP species (indicating corrections for 25% observation rule); • Communication of the agenda and minutes of C3P meetings; • A process for the evaluation and revision of the Management Plan.
Progress on Condition Year 2	<p>A draft management was circulated among stakeholders, and published in August 2015 (TAAF, 2015c). The Management Plan evaluation is scheduled after three years (2018). Progress for this condition is therefore back on target in relation to the milestones and the client action plan, although some essential aspects are missing from the draft plan for the condition to be closed as yet:</p> <ul style="list-style-type: none"> • <u>Harvest control rules (HCRs) are not yet sufficiently clear and transparent.</u> The team accepted the argument that this is due to the fact that the process of full development of the stock assessment model is still ongoing. However, to remain on target, transparent harvest control rules will need to be incorporated into the management plan once the new model developments are validated by CCAMLR to provide a firm basis for TAC decision rules. <u>Progress on this point by next year's audit is essential;</u> • Some detailed information was presented by TAAF at the C3P meeting regarding vessel performance with respect to rays, birds and the hook/line loss criteria now part of the vessel quota allocation rules. Some changes in the rules for 2015/16 have not been openly communicated and have been part of an ongoing discussion between stakeholders. The criteria system will need to be published and explained (or incorporated into the management plan) in order to serve its purpose as a basis for transparent decision-making; • The C3P will need to convene as a more transparent task group to analyse information from the vessel captains and encourage open discussions between vessels and with TAAF and MNHN scientists to collaborate identifying further best practice rules.
Progress on Condition Year 3	<p>The management came into force in September 2015 (TAAF, 2015) with an evaluation scheduled in 2018.</p>

	<p>The stock assessment model has been updated (see Condition 1) and is now used to inform TAC decisions validated by CCAMLR in 2016. Once the new model developments are validated by CCAMLR to provide a firm basis for TAC decision rules, a set of HCR will need to be incorporated into the Management Plan. The TAAF has also pledged to propose changes to the TAC for the season starting <u>after</u> the CCAMLR reports are publically available (see Recommendation 8). Under the current precautionary management regime, the condition is therefore on target.</p> <p>Contrary to best practice, which postpones modifications to the Management Plan for the period set in the Plan (three years), an aspect of the Management Plan was modified in 2016, to make possible the introduction of a new entrant for the 2016/2017 season. So far, the number of vessels active in the zone at any given time has been modified to "7 at any one time", but the consequences on the sustainability of the fishery will have to be evaluated as a matter of urgency.</p> <p>This year, TAAF provided the audit team with a copy of the C3P presentation (although the vessel owners didn't have one), and the meeting minutes have been published (TAAF, 2016b). At the C3P TAAF present detailed information on individual vessel performances with respect to tag returns, catches of juvenile toothfish, skates, birds and the hook/line loss criteria etc. It is felt that more transparent and open discussion are needed with TAAF and MNHN scientists and vessel captains collectively, to develop best practice and help improve further individual and collective environmental performances of the fleet.</p> <p>The current secretive discussions of individual vessel results used in the vessel quota allocation appear to have divided the fleet and decreased their possibilities to collaborate among themselves. For improved governance, the quota allocation criteria system will need to be published and explained in the next version of the management plan.</p>
Status of condition	The condition is 'on target'.

4.2. Recommendations

Recommendations 1, 4, 5, 6 and 7 were closed during the year 2 surveillance – they are therefore not repeated here. Progress against recommendations 2, 3 and 8 is shown in the tables below.

Table 12. Recommendation 2: Evaluation of ray discard mortality

Performance Indicator	PI number	
	2.1.2	There is some objective basis for confidence that the partial strategy will work, based on some information directly about the fishery and/or species involved.
Recommendation		In addition to the condition, the team recommends that further information is sought, either from a desktop review or from field studies, on the survivorship of rays at Kerguelen after being cut off the line, to elucidate the apparent differences between Kerguelen and South Georgia, which could relate to the species mix, the ecosystem or fishing practices, or a mixture. On the basis of this information, the conservation strategy for rays could be reviewed.
Progress on Recommendation Year 1		No specific progress on this aspect.

Progress on Recommendation Year 2	A first analysis by TAAF DCPN of the numbers of rays processed, discarded and cut off was presented to the vessel captains, showing that most rays are presently cut off irrespective of their survival prospects. A study is planned.
Progress on Recommendation Year 3	<p>Table 5 shows a marked decrease in the volume of rays caught (from 456t in 2010 to 68t in 2014) while the number of individuals released alive has increased significantly: from 2 in 2010 to just under 40,000 in 2014.</p> <p>The impacts of the Kerguelen fishery on skates have been analysed in detail over the period 1997-2014 in collaboration with Australian colleagues for the HIMI fishery. The study concludes that, although survival rates from the cut-off policy are unknown, there appears to be little change in the abundance of the Kerguelen skate species as indicated by their catch rates in the toothfish fishery. Therefore, the CCAMLR fisheries conservation measures and marine reserves in the area “appear to provide effective protection for the skates ...” at least in the shallower waters where the trawl fisheries operate” (Nowara et al., 2017). Careful monitoring in the Kerguelen fishery is ongoing, together with the cut-off and move-on rule (Thibault Thellier). However, TAAF noted large remaining differences between vessels.</p> <p>On this basis, this recommendation remains open.</p>

Table 13. Recommendation 3: Focus bird objectives on grey petrels specifically

Performance Indicator	PI number	
	2.3.2	There is evidence that the strategy is being implemented successfully for grey petrels
Recommendation		It would be useful to evaluate the effectiveness of the above measures, and of individual vessels, in relation to grey petrels specifically, and if necessary re-focus on those measures which reduce mortality of grey petrels in particular. We note that further to the PCDR stage of this report, TAAF have started this process (draft note on conservation objectives in relation to grey petrels provided to assessment team, July 2013).
Progress on Recommendation Year 1		TAFF and SARPC are actively working on reducing interactions with grey petrels. Only 8 grey petrels were reported caught (dead) for 2013/2014. With the extrapolation from only 25% of the lines fully observed, this correspond to about 1 bird for each for two of the SARPC seven vessels. The current process of bird mortalities is discussed by TAAF with each vessel concerned individually after each fishing trip and best practice guidelines that have emerged are proving very effective. However, figures are not shared or discussed by TAAF openly with all vessels captains present, which limits shared understanding within the fleet.
Progress on Recommendation Year 2		Three grey petrels were reported caught (dead) for 2014/15 on the 25% lines observed. The TAAF DCPN is monitoring progress and urging for further decrease. A possible cooperative TAAF-SARPC task group, to identify and openly discuss further improvements constraints and opportunities between vessels is considered.
Progress on Recommendation Year 3		The total number of birds observed to be dead or wounded during fishing operations was 18 (12 white-chinned and 6 grey petrels) for the 2015-16 season from 25% of all lines hauled by the fleet (TAAF, 2016b). TAAF noted large remaining differences between vessels (from 2 to 6 birds) and a strong possibility

	<p>that the crew under-reported observations on the 75% lines not observed, and therefore that improvements are possible.</p> <p>This recommendation remains open.</p>
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Table 14. Recommendation 8: Effective decision making processes (raised during year 2 surveillance)

Performance Indicator	PI number	
	3.2.2	Effective decision making processes
Recommendation		The team recommends that TAC changes should apply to the season following CCAMLR meetings at the earliest.
Progress on Recommendation Year 1		N/a
Progress on Recommendation Year 2		N/a
Progress on Recommendation Year 3		<p>TAAF representatives present at the site visit confirmed that, effective from the 2016/2017 season, TAC changes would be presented at CCAMLR and validated before the beginning of the following season for changes to be introduced. Therefore, a TAC of 5,300 tonnes is to be kept for 2017/2018. If this is confirmed at the next audit, the recommendation will be closed.</p> <p>This recommendation remains open.</p>

5. Conclusion

The audit team confirms that this fishery continues to conform to the MSC Principles and Criteria for sustainable fishing. The Client Group is generally on target with addressing the conditions, although the persistent lack of effective cooperation between TAAF and fishing captains, for example through the C3P, is probably slowing the sharing of best practice in this fishery.

No new conditions or recommendations were raised as a result of this surveillance audit. No Performance Indicators have been rescored. The surveillance level remains at 6.

The audit team recommends that this fishery should remain certified and that product remains eligible to enter further chains of custody.

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Appendices

Appendix 1. Stakeholder submissions

M Yannick Lauri, President COPECMA, a fishing company based in La Réunion, wanted to alert the audit team to on-going problems linked to a possible new entrant in the Kerguelen (and Crozet) Toothfish fishery. The COPECMA had leased a demersal trawler to undertake an exploratory survey of the icefish resources in 2016-2017 on the understanding that the company would be well placed to obtain some toothfish quota.

Allegedly, the COPECMA was told that the TAAF were not authorising a new entrant, which was seemingly overturned at Ministerial level with the authorisation of a new entrant into the fishery for the 2016-2017 season (effectively, the Corynthian Bay of the Company Réunion Pêche Australe, was awarded a quota of 80 tonnes in Kerguelen waters; arrêté 2016-99 16 September 2016 and started fishing at the end of December 2016). The COPECMA, and SARPC members are challenging the TAAF in the Administrative Courts.