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MRAG Americas, Inc.

Alaska Salmon Fishery and Annette Island Reserve Salmon Fishery

MSC Variation Request

Table 1 – Variation request

1	Date submitted to the MSC
	12 June 2019
2	CAB
	MRAG Americas Inc and SCS Global Services
3	Fishery name and certificate number or CoC certificate number
	Annette Islands Reserve Salmon Fishery (F-SCS-0103) & Alaska Salmon Fishery (MSC-F-30027)
4	Lead auditor or program manager
	Gabriela Anhalzer—Program Manager of Fisheries, SCS Global Services Amanda Stern-Pirlot—Director of Fisheries Certification, MRAG
5	Request prepared by
	Shelby Oliver (SCS) and Amanda Stern-Pirlot (MRAG Americas)
6	Scheme requirement(s) for which variation requested
	FCP V2.1 7.9.1.1 The variation request is sought against the requirement in 7.9.1.1 that ‘the fishery client to trace back to the UoC any fish or fish products sold as MSC certified.’
7	How many times has a variation for this requirement been accepted for the same assessment of the same fishery?

	No variation for this requirement has ever been sought for either the AIR or Alaska fishery certificate.
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Table 2 – Variation justification

1	Proposed variation	<p>Given that all salmon caught commercially in Alaska are certified, this variation requests asks that traceability is only required back to the AK region, and not to the UoC specifically. A joint variation request to cover both certificates is requested.</p> <p>As described below, salmon from the UoC may be transported within the same tender well as salmon caught from the AK State certified fishery. A method for chain of custody volume verification is described below in the Justification section.</p> <p>The timeline for this variation request is from the date that is accepted through to November 16, 2019. This will cover both certificates for the duration of the 2019 salmon fishing season, with some additional time for any delayed sales/fishing activity.</p>
2	Additional time requested	
	Original deadline date	NA—variation request not for time requirement
	Modified deadline date requested	NA—variation request not for time requirement
	Length of additional time requested	NA—variation request not for time requirement
3	Justification	<p>Chain of Custody in the PCR (section 5.3, pg. 98) states that salmon landed by fishermen within the UoC ‘are eligible to enter further chains of custody via landing at Silver Bay Seafoods in Metlakatla, or on <i>an associated tender within AIR waters.</i>’</p> <p>For the UoC to sell product as certified for the 2019 year, a variation request is needed. There has been a change in the processing plant located on Annette Island (effective in 2019), and the plant will not be operating for the 2019 salmon season.</p> <p>Instead, fish tenders will collect, and transport salmon caught within the UoC to processing facilities located in Ketchikan, AK or in nearby areas. These tenders will include those contracted to operate in the AIR (i.e. already covered under the AIR fishery certificate) and other tenders that are owned by processing companies in possession of a valid CoC certificate that will be coming from outside the UoC waters to collect salmon. The fishermen will be paid by the company receiving the salmon, and tenders will issue fish tickets to the fishermen directly, and the original fish and game copies will be given to the AIR office or the ADF&G office for fishery management purposes. If an MSC traceability test is conducted, relevant CoC companies will be able to access the fish tickets from the AIR UoC or the ADF&G office (depending on the traceback/within which UoC the fish was caught).</p> <p>The variation request is sought to address the following issue: When these tenders are coming from outside waters from the UoC, they may be collecting salmon from the MSC certified State of Alaska fishery. There is no method on-board the vessels to segregate salmon caught in the AIR UoC from salmon caught in the State of Alaska fishery.</p> <p>However, as both AIR and the State are certified for all the same salmon species (i.e. chum, pink, sockeye, coho, and king salmon), and all commercial gear types are certified, there is an extremely minimal to virtually no risk that non-certified salmon will enter the supply chain and mistakenly be sold as MSC salmon.</p>

	<p>While it is not possible to separate State from AIR certified salmon when it is mixed in the tender's hold, fish tickets can be used to validate volumes. If a tender accepted salmon from both the State and AIR UoC in the same hold, the fish tickets will allow the sum of volumes across all the different fish tickets to be calculated, which can then be used to validate the quantity received by the tenders.</p> <p>This variation request is contingent on the entire AK state salmon fishery, and the AIR fishery, being certified. If this changes, then the variation request is considered to be invalid.</p> <p>In the instance of one of the UoC's listed in either certificate becoming suspended prior to the expiration of this variation request (November 16, 2019), then the following would apply:</p> <ul style="list-style-type: none"> • The three tenders contracted/operating within the AIR would be allowed to continue to operate/delivery fish to the mainland. These tenders do not/will not take salmon from outside the AIR UoC (even with the VR in place). <p>For the tenders that are contracted by companies from the mainland, this is the only risk in mixing of the UoC's which the variation request seeks to cover. As these tenders are contracted by the CoC companies, it falls under the purview of the CoC companies that are contracting the tenders (i.e. there has been a change in ownership upon delivery to the tender). They would then be responsible for controlling/ensuring that mixing of state of Alaska/AIR would not occur if a UoC becomes suspended. As stated in the Alaska State PCR in the traceability section (pg. 124), 'Processors control the transport of their products from landing locations to processing facilities.' Therefore, it would fall on processors eligible to receive certified MSC salmon to ensure that no mixing of non-certified with certified salmon would occur on the tender vessels.</p>
4	If a fishery assessment, implications for assessment
	None—there will be no impact on timelines and since all salmon caught commercially in AK is certified, there is no expected concern from stakeholders. As stated, if this situation changes, the variation request would be considered mute and tenders that are accepting fish from both certificates would not be able to mix salmon caught on different certificates during the same trip. This information would be validated through fish tickets that are issued to fishermen by the tenders and reported to the relevant agencies (i.e. Metlakatla Fish & Wildlife and ADF&G)
5	If a fishery assessment, mitigation of the implications for assessment
	Please include information how risks of the implications for the assessment that have been identified under the previous question are proposed to be mitigated by the CAB.
6	If a fishery assessment, how many conditions does the fishery have and will their progress be affected (positive or negative)?
	This is not a fisheries assessment. Both fisheries are currently certified and fish tickets can be used to validate volumes caught. There will be no impact on timelines and since all salmon caught commercially in AK is certified, there is no expected concern from stakeholders. As stated, if this situation changes, the variation request would be considered mute and valid processing companies using tenders would need to ensure that no mixing between certified/non-certified salmon and between UoC's occurs.
7	What is the status of the current assessment or audit?
	<p>AIR salmon fishery: The fishery has 5 conditions. No conditions are related to traceability, and there is no expected impact (positive or negative) on the fishery assessment.</p> <p>Alaska salmon fishery: The fishery has 8 conditions. No conditions are related to traceability, and there is no expected impact (positive or negative) on the fishery assessment.</p>
8	Further comments
	NA
9	If applicable, additional information added after the MSC's request

Additional information was added into this variation request (the initial was submitted May 13, 2019) regarding:

- Timeline: timeline has been specified, ranging from when the VR is accepted until November 16, 2019
- Specification on measures if a UoC is suspended: See Justification section, final paragraphs. In summary, the responsibility falls on the tenders that are contracted by valid CoC processors to ensure that mixing of state of Alaska/AIR would not occur if a UoC becomes suspended
- Anticipated proportion of trips that will be impacted from the AIR certificate: though unknown, it is estimated that 25% of tender trips may come from those tenders located on the mainland. Some unknown proportion of these may involve mixing of salmon between UoC's

Joint variation request: Initially, the VR was only submitted by SCS, however this version is a joint variation request with MRAG and SCS.