



Amanda Stern-Pirlot  
MRAG Americas, Inc (MRAG)  
10051 5th Street, Suit 105  
St Petersburg  
United States  
33702

**Sent by email**

Date: 29/08/2018

**Subject: Request for variation to the MSC Certification Requirement v2.0 FCR-7.4.14.2 for South Australia Sardine Fishery**

Dear Amanda Stern-Pirlot,

I write with reference to your submission on 11/06/2018 of a request for variation to the MSC Certification Requirement (CR) to allow:

This variation request is referred to allow entering IPI stocks in the MSC chain of custody, in accordance to FCR 7.4.14.2. if the current assessment of South Australia sardine results in a successful certification. The species proposed to include as IPI stocks are: maray (*Etrumeus jacksoniensis*), anchovy (*Engraulis australis*), blue mackerel (*Scomber australasicus*), sandy sprat (*Hyperlophus vittatus*), Degen's leatherjacket (*Thamnaconus degeni*), rough bullseye (*Pempheris klunzingeri*), soldierfish (Family Holocentridae), silver biddy (*Gerres subfasciatus*), blue sprat (*Spratelloides robustus*) and redbait (*Emmelichthys nitidus*).

As you are aware, the CR procedures relating to v2.0 FCR-7.4.14.2 state:

Allow fish or fish products considered as coming from IPI stocks to enter chains of custody, with an exemption to the additional assessment requirements for IPI stocks given in PA4.2

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:**

- IPI stocks are Maray (IPI stock variation request approved on 7 June 2018) and anchovy (*Engraulis australis*), blue mackerel (*Scomber australasicus*), sandy sprat (*Hyperlophus vittatus*), Degen's leatherjacket (*Thamnaconus degeni*), rough bullseye (*Pempheris klunzingeri*), soldierfish (Family Holocentridae), silver biddy (*Gerres subfasciatus*), blue sprat (*Spratelloides robustus*) and redbait (*Emmelichthys nitidus*).
- The catch proportion of the IPI stocks is less than 2% of total abundance in catch.
- IPI stocks are practically indistinguishable from sardine and it is not practical or feasible to separate them from sardine catch. (FCR-7.4.13.1a and b are met)
- The probability of sardine fishery encountering IPI stocks is rare.
- IPI stocks are not an ETP species. (FCR-7.4.13.1d is met)
- IPI stocks are not certified elsewhere. (FCR-7.4.13.1e is met)
- CAB states that sardine fishery does not have a significant impact on the IPI stocks, and catch of IPI stocks are less than 1% of total sardine catch (FCR-7.4.14.2ai is met and FCR-7.4.13.1c is met - far less than 15% of total catch)
- Based on the above MRAG Americas considers that IPI stocks, in addition to 7.4.13.1, also fulfil requirement 7.4.14.2 (i) and (ii).

**Given the rationale provided, the MSC is willing to grant a variation to the CR.**



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