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Lloyd's Register

Denmark, Estonia, Germany & Sweden herring & sprat fishery Stakeholder Announcement: Changes that Impact Traceability 15th September 2021

1 Introduction

On the 16th July 2021 Lloyd's Register ("LR") announced the intention to suspend the Central Baltic herring Units of Certification (UoCs 1-6) for this certified fishery. These UoCs will be suspended on the **15th September 2021**.

The other UoCs (for Baltic Sprat and for Gulf of Bothnia herring) will remain certified following the suspension of the Central Baltic herring UoCs.

The change to the status of the Central Baltic herring UoCs creates a risk that herring from this stock may be caught and landed by fishing vessels at the same time as fish from the stocks that remain certified. This presents a risk to the integrity of the MSC supply chain. To address and mitigate this risk LR have reviewed the traceability arrangements that are in place for the UoCs that will remain certified.

The results of this review are presented here. The conclusions are that:-

- 1) **Before 15th September 2021:** Central Baltic herring, Gulf of Bothnia herring, and Baltic sprat caught by UoC vessels **are eligible** to enter MSC Chain of Custody.
- 2) **On 15th September 2021 and until further notice:-**
 - a. Central Baltic herring (from ICES Subdivisions ("SD") 25-27, 28.2, 29, 32) **are not eligible** to enter MSC CoC
 - b. Gulf of Bothnia herring (from SD 30-31) **are eligible** to enter MSC CoC;
 - c. Baltic sprat (from SD 22-32)
 - i. **Are eligible** to enter MSC CoC if caught in the Gulf of Bothnia (SD30-31);
 - ii. **Are not eligible** to enter MSC CoC if caught in the Central Baltic herring area (SD25-27, 28.2, 29 & 32) **unless** the buyer can confirm that the fish being purchased are all sprat.

2 Marine Stewardship Council announcement

Table 1 – Fishery details

| | | | | | | | |
|---|---|----------------|---|--|----------------|--|-------|
| 1 | Date submitted to the MSC | | | | | | |
| | 14 th September 2021 (revised on the 15 th of October 2021) | | | | | | |
| 2 | CAB | | | | | | |
| | Acoura Marine (t/a Lloyd's Register) | | | | | | |
| 3 | Fishery name and certificate number | | | | | | |
| | Finland Baltic herring & sprat (MSC-F-31377) Denmark, Estonia, Germany, Sweden Baltic herring and sprat (MSC-F-31479) | | | | | | |
| | Units of Certification affected | | | | | | |
| | There are a total of 14 Units of Certification for this fishery, summarised in the table below. UoCs 1-6 (for Central Baltic herring) are due to be suspended on the 15 th September 2021. These are shown in strikethrough text in the table below. | | | | | | |
| | UoC | Species | Stock / Area | Metier | Country | Client group | |
| | 4 | Herring | Central Baltic (Subdivisions 25-29 & 32 (excl Gulf of Riga 28.1)) | Pelagic trawl | Denmark | DPPO & DFPO | |
| | 2 | | | | Germany | Erzeugergemeinschaft der Nord- und Ostseefischer GmbH, | |
| | 3 | | | | Estonia | Eesti Kalapüügiühistu, Eesti Kutselite Kalurite Ühistu, Eesti Traalpüügi Ühistu | |
| | 4 | | | | Sweden | SPFPO | |
| | 5 | | | Purse seine | Denmark | DPPO & DFPO | |
| | 6 | | | Sweden | SPFPO | | |
| | 7 | | | Gulf of Bothnia (Subdivisions 30-31) | Pelagic trawl | Sweden | SPFPO |
| | 8 | | | | Purse seine | Sweden | SPFPO |

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| | | | | | | |
|---|--|-------|-----------------------|---------------|---------|---|
| | 9 | Sprat | Subdivisions 25-32 | Pelagic trawl | Denmark | DPPO & DFPO |
| | 10 | | | | Germany | Erzeugergemeinschaft der Nord- und Ostseefischer GmbH, |
| | 11 | | | | Estonia | Eesti Kalapüügiühistu, Eesti Kutselite Kalurite Ühistu, Eesti Traalpüügi Ühistu |
| | 12 | | | | Sweden | SPFPO |
| | 13 | | | Purse seine | Denmark | DPPO & DFPO |
| | 14 | | | | Sweden | SPFPO |
| 4 | Lead auditor or program manager | | | | | |
| | Lead auditor – Jim Andrews LR HO Program manager – Gillian Irvine | | | | | |
| 5 | Announcement prepared by | | | | | |
| | Lead auditor – Jim Andrews LR HO Program manager – Gillian | | | | | |
| 6 | Relevant scheme requirements | | | | | |
| | <p>The suspension of the Central Baltic herring UoCs triggers the need to evaluate that risk of non-MSC certified Central Baltic herring becoming mixed with MSC-certified Baltic sprat or Gulf of Bothnia herring. There are two issues to consider here: firstly whether or not the Central Baltic herring are eligible to be considered as an “Inseparably or practicably inseparable catch” (“IPI”) that would allow it to enter supply chains under the existing certificates; and secondly whether the suspension of the Central Baltic herring UoCs has any other impacts on the evaluation of traceability.</p> <p>Each of these issues is considered in turn below.</p> <p>A. Central Baltic herring as an Inseparable or practicably inseparable (“IPI”) catch</p> <p>The catch from a fishery that meets “IPI” criteria to be sold with the target catch under the MSC ecolabel. The IPI species are permitted to make up as much as 15% by weight of the total combined catch. The criteria that must be met in order to allow this to happen are:-</p> | | | | | |

7.5.9 The CAB shall determine whether there are catches of non-target (Principle 2) stock(s) that are inseparable or practicably inseparable (IPI) from target (Principle 1) stock(s).

7.5.9.1 The CAB shall only recognise stock(s) as being an IPI stock where the inseparability arises because either:

- a. The non-target catch is practicably indistinguishable during normal fishing operations (i.e. the catch is from a stock of the same species or a closely related species), or*
- b. When distinguishable, it is not commercially feasible to separate due to the practical operation of the fishery that would require significant modification to existing harvesting and processing methods.*

And:

- c. The total combined proportion of catches from the IPI stock(s) do not exceed 15% by weight of the total combined catches of target and IPI stock(s) for the UoA.*
- d. The IPI stock(s) are not endangered, threatened or protected (ETP) species.*
- e. The IPI stock(s) are not certified separately.*

In the Baltic sprat fishery for some vessels at some times of year the catch may contain a mixture of both sprat and herring. For vessels which land fish for human consumption, the mixed catch is likely to be sorted prior to sale; however for vessels landing fish for use as fishmeal, there is no need to sort the catch and both sprat and herring are likely to be landed together.

The use of the MSC's allowance of up to 15% of the weight of the catch being composed of the IPI species (7.5.9.1.c) is contingent about the IPI stock concerned being neither an "endangered, threatened or protected" species nor being certified separately.

In the case of Central Baltic herring, the species and stock does not meet the MSC's ETP requirements; however it is certified separately (even though certification is presently suspended), so 7.5.9.1.e prevents the Central Baltic herring stock from being classified as an IPI species in the sprat fishery.

This conclusion also applies to the limit of 2% permitted by the MSC under 7.5.12.2.a.ii. This limit is only available to stocks that are not certified separately.

The consequences of this are that

- i) Any Central Baltic herring that are caught in the sprat UoC are not eligible to be sold as MSC-certified using the "IPI" designation; and
- ii) Any sprat that are to be sold or traded under the MSC ecolabel must be separated from any Central Baltic herring that they are caught with, and the traceability system for these sprat must be re-evaluated (see below).

B. Evaluation of traceability systems

The criteria for evaluating traceability systems are set out in MSC Fisheries Certification Process v2.2 at §7.9. These require, *inter alia*, that the CAB should evaluate whether the fishery has adequate systems for

7.9 Determination of the traceability systems and point(s) at which fish and fish products enter further certified Chains of Custody

7.9.1 The CAB shall determine whether the fishery client has sufficient systems of tracking and tracing to ensure all fish and fish products identified and sold as certified by the fishery client originate from an appropriate UoC.

7.9.1.1 The CAB shall confirm that systems allow the fishery client to trace back to the UoC any fish or fish products sold as MSC certified.

7.9.1.2 The CAB shall confirm that the fishery client maintains appropriate records to demonstrate the traceability back to their UoCs of certified fish or fish products.

7.9.1.3 The CAB shall document any of the risk factors outlined in the Announcement Comment Draft Report, identifying any areas of risk for the integrity of certified products and how they are managed and mitigated.

7.9.1.4 For each risk factor identified in 7.9.1.3, the CAB shall describe the risk present and details of the mitigation or management of risk.

7.9.1.5 The CAB shall identify and document in the Announcement Comment Draft Report:

- a. The UoC.*
- b. The point of intended change of ownership of product.*
- c. The point from which subsequent Chain of Custody certification is required.*

7.9.1.6 Where there are IPI stock(s) within the scope of certification, teams shall follow Annex PA and report on the verification of the traceability systems including:

- a. An evaluation of the species, stock, proportion and weight of the catch of IPI stock(s) and their eligibility to enter further certified chains of custody, as per Annex PA.*

7.9.2 If the CAB makes a positive determination under 7.9.1, fish and fish products from the UoC may enter into certified chains of custody and be eligible to be sold as MSC certified or carry the MSC ecolabel.

7.9.2.1 The CAB shall determine and document the scope of the fishery certificate, including the parties and categories of

parties eligible to use the certificate and the point(s) at which Chain of Custody is needed, as follows:

a. Chain of Custody certification shall always be required following first change of ownership to any party not covered by the fishery certificate.

b. Chain of Custody certification may be required at an earlier stage than change of ownership if the team determines that the systems within the fishery are not sufficient to make sure all fish and fish products identified as such by the fishery originate from the UoC.

7.9.3 If the CAB makes a negative determination under 7.9.1, the CAB shall state in its reports that fish and fish products from the UoC are not eligible to be sold as MSC certified or carry the MSC ecolabel.

7.9.3.1 This determination shall remain in force until revised by the CAB in a subsequent assessment.

7.9.4 The CAB shall inform the UoC that if they sell or label non-eligible (non-conforming) product as MSC certified, they must:

a. Inform any affected customers and the CAB of the issue within 4 days of detection.

b. Immediately cease to sell any non-conforming products in stock as MSC certified until their certified status has been verified by the CAB.

c. Cooperate with the CAB to determine the cause of the issue and to implement any corrective actions required.

An evaluation of the traceability arrangements is provided in section 3 of this notice.

7 Summary

The conclusions of this review of changes which may affect traceability are summarised in the table below.

| Units of Certification | Determination |
|--------------------------------|--|
| 1-6: Central Baltic herring | Fish from these UoCs are not eligible to enter MSC Chains of Custody, because the stock no longer meets MSC certification requirements. |
| 7 & 8: Gulf of Bothnia herring | Fish from these UoCs are eligible to enter MSC Chains of Custody. This is because:- a) The Gulf of Bothnia stock currently meets MSC certification requirements; and |

| | |
|---------------------------|---|
| | <p>b) Vessels are not permitted to fish in more than one stock area on a single fishing trip¹.</p> |
| <p>9-14: Baltic sprat</p> | <p>Sprat from these UoCs are not eligible to enter MSC Chains of Custody, unless it can be verified by the buyer that:-</p> <p>a) The sprat were caught in the Gulf of Bothnia (ICES Sub-Divisions 30&31), where the herring stock currently meets MSC certification requirements so that a mixed catch of sprat and herring would be eligible to enter the Chain of Custody; or</p> <p>b) For sprat caught in SD25-27, 28.2, 29 & 32 (the Central Baltic herring stock area) the fish being purchased are all sprat.</p> |

¹ This applies to Swedish vessels only – see section 3.1.4 of this report.

3 Evaluation of developments or changes within the fishery which impact traceability or the ability to segregate between fish from the Unit of Certification (UoC) and fish from outside the UoC (non-certified fish)

3.1 Traceability within the Fishery

All of the client fisheries are based in EU Member States and are therefore subject to all of the CFP control regulations, including Council Regulations 1224/2009, 1139/2016 and 1241/2019.

Each client group operates under slightly different EU Member State implementation of the EU management regime and also national control measures.

An evaluation of traceability risks for each client group is presented in the following tables.

3.1.1 Traceability in Danish UoAs

An assessment of traceability risks is presented in the table below.

Table 1: Traceability Factors within the Danish UoAs for Baltic Sprats (UoAs 9 & 13).

| Traceability Factor | Description of risk factor if present. Where applicable, a description of relevant mitigation measures or traceability systems (this can include the role of existing regulatory or fishery management controls) |
|--|---|
| Potential for non-certified gear/s to be used within the fishery | <p>None – DPPO and DFPO vessels only fish with pelagic trawl and purse seine.</p> <p>Vessels are inspected both in port and at sea (see section 6.4.7 of the PCR). Inspectors check that the correct fishing gear is in use. Catch and landings declarations also have to specify the type of fishing gear used. The level of monitoring and reporting required minimises the risk of non-certified gear being used in the fishery.</p> |
| Potential for vessels from the UoC to fish outside the UoC or in different geographical areas (on the same trips or different trips) | <p>The only adjacent waters where herring or sprat may be caught are the Russian EEZ (where UoC vessels are not permitted to fish); the Gulf of Riga (none of the Danish UoA vessels are permitted to fish here); and the Western Baltic (ICES sub-divisions SD22-24, where UoA vessels are permitted to fish).</p> <p>The EU CFP and its daughter regulations require that all movements of vessels >12m LOA are monitored using VMS (see Figure 24 of the PCR) which allows for independent and continuous monitoring of activity. All vessel catches are recorded in e-logbooks, and all landings are recorded in a statutory landing declaration, each of which identify the location of fishing activity. Sales notes for batches of fish can be reconciled with landing declarations and logbooks, so all fish can be traced back to the area where they were caught.</p> <p>The CAB considers that although some of the vessels may fish outside the UoC from time to time, the statutory monitoring arrangements in place ensure that the risk of fish from outside the UoC being mixed with certified fish is low.</p> |

| Traceability Factor | Description of risk factor if present. Where applicable, a description of relevant mitigation measures or traceability systems (this can include the role of existing regulatory or fishery management controls) |
|--|---|
| <p>Potential for vessels outside of the UoC or client group fishing the same stock</p> | <p>A list of UoC vessels is provided in Table 51 & 52 of the PCR.</p> <p>Vessels outside the UoC fish on the same stocks. Latvian, Lithuanian, Polish and Finnish fishery all have quota shares of the central herring and sprat. Finland and Sweden share the fishery in subarea 30-31. The Finnish fishery have MSC certificate -also by Acoura – for both Herring and Sprat in the Baltic Sea. The Latvian fishermen’s PO hold a MSC certificate for the sprat in the Baltic. These vessels could land herring or sprat at Danish ports.</p> <p>All landings are reported and recorded, and quantities of fish landed are reconciled with logbook catch records. This ensures that the processing factory is able to identify the vessel which caught a particular consignment of fish.</p> <p>The statutory controls and checks in place ensure that fish caught by non-UoC vessels can be distinguished from certified fish prior to the start of any processing operations. The risk of fish caught by non-UoC vessels becoming mixed with fish from UoC vessels prior to processing starting is therefore considered to be low.</p> |
| <p>Risks of mixing between certified and non-certified catch during storage, transport, or handling activities (including transport at sea and on land, points of landing, and sales at auction)</p> | <p>Fish can only be landed at designated ports (see the list in Table 37 of the PCR). When fish are landed they are weighed by an independent third party and delivered to the facilities of the buyer. The Danish PO’s do not own processing facilities.</p> <p>The fish landed for industrial purposes are landed unsorted. When the fish are landed details on where they are caught are provided by the vessel to the buyer.</p> <p>Although the herring in the Central Baltic area are MSC-certified, the certificate has been suspended. There is therefore a risk that MSC-certified sprat could become mixed with the Central Baltic herring which are not eligible to bear the MSC ecolabel.</p> <p>Because of this risk, sprat caught from ICES Subdivisions SD25-27, 28.2, 29 & 32 are only eligible to enter chain of custody if it can be verified that the consignment of fish is 100% sprat.</p> |

| Traceability Factor | Description of risk factor if present. Where applicable, a description of relevant mitigation measures or traceability systems (this can include the role of existing regulatory or fishery management controls) |
|--|--|
| | |
| Risks of mixing between certified and non-certified catch during processing activities (at-sea and/or before subsequent Chain of Custody) | No at-sea processing takes place in this fishery; all of the sprat and herring are landed chilled as whole fish. There is therefore no risk of mixing of fish during processing at sea. The risks of mixing of certified and non-certified fish during processing after landing has not been assessed. Processing facilities would require their own MSC Chain of Custody certification. |
| Risks of mixing between certified and non-certified catch during transshipment | Transshipment of fish at sea is prohibited, so there is also no risk of fish from a non-UoC vessel being transferred to a UoC vessel. |
| Any other risks of substitution between fish from the UoC (certified catch) and fish from outside this unit (non-certified catch) before subsequent Chain of Custody is required | The CAB did not identify any other risks related to traceability for this UOA. |

3.1.2 Traceability in Estonian UoAs

An assessment of traceability risks is presented in the table below.

Table 2: Traceability Factors within the Estonian UoAs for Baltic Sprats (UoA 11)

| Traceability Factor | Description of risk factor if present. Where applicable, a description of relevant mitigation measures or traceability systems (this can include the role of existing regulatory or fishery management controls) |
|--|--|
| Potential for non-certified gear/s to be used within the fishery | <p>None. The UoC vessels are all permitted to use pelagic / mid-water trawls only. Vessels are restricted to a single gear type per trip.</p> <p>Vessels are inspected both in port and at sea (see section 6.4.7 of the PCR). Inspectors check that the correct fishing gear is in use. Catch and landings declarations also have to specify the type of fishing gear used. The level of monitoring and reporting required minimises the risk of non-certified gear being used in the fishery.</p> |
| Potential for vessels from the UoC to fish outside the UoC or in different geographical areas (on the same trips or different trips) | <p>The only adjacent waters where herring or sprat may be caught are the Russian EEZ (where UoC vessels are not permitted to fish); the Gulf of Riga (where some of the smaller UoA vessels are permitted to fish); and the Western Baltic (ICES sub-divisions SD22-24, where UoA vessels are permitted to fish).</p> <p>Only vessels with engines smaller than 221kW and quota for the area are permitted to fish in the Gulf of Riga. All trawls used in the Gulf of Riga must have a maximum opening of 12m, which is much smaller than used in the Central Baltic; hence vessels do not fish in both areas on a single trip.</p> <p>The EU CFP and its daughter regulations require that all movements of vessels >12m LOA are monitored using VMS (see Error! Reference source not found.) which allows for independent and continuous monitoring of activity. All vessel catches are recorded in e-logbooks, and all landings are recorded in a statutory landing declaration, each of which identify the location of fishing activity. Sales notes for batches of fish can be reconciled with landing declarations and logbooks, so all fish can be traced back to the area where they were caught.</p> |

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| Traceability Factor | Description of risk factor if present. Where applicable, a description of relevant mitigation measures or traceability systems (this can include the role of existing regulatory or fishery management controls) |
|--|--|
| | <p>The CAB considers that although some of the vessels may fish outside the UoC from time to time, the statutory monitoring arrangements in place ensure that the risk of fish from outside the UoC being mixed with certified fish is low.</p> |
| <p>Potential for vessels outside of the UoC or client group fishing the same stock</p> | <p>A list of UoC vessels is provided in Table 54 of the PCR.</p> <p>Both the Central Baltic Herring and Baltic Sprat stocks are fished by non-certified vessels, and these could land at Estonian ports.</p> <p>All landings are reported and recorded, and quantities of fish landed are reconciled with logbook catch records. This ensures that the processing factory is able to identify the vessel which caught a particular consignment of fish.</p> <p>The statutory controls and checks in place ensure that fish caught by non-UoC vessels can be distinguished from certified fish prior to the start of any processing operations. The risk of fish caught by non-UoC vessels becoming mixed with fish from UoC vessels prior to processing starting is therefore considered to be low.</p> |
| <p>Risks of mixing between certified and non-certified catch during storage, transport, or handling activities (including transport at sea and on land, points of landing, and sales at auction)</p> | <p>Fish can only be landed at designated ports (see the list in Table 39 of the PCR). The herring and sprat are caught and landed as unsorted catch and are not processed or handled in any way before being landed.</p> <p>When fish are landed they are stored in tubs. These tubs are transported to the grading and processing facilities owned by the buyer or the PO. Our companies and PO's buy the fish only from the member vessels. That means that we do not buy from open market, but all our fish comes from our own members. We own our own transport as well, so we control the entire chain from loading in the port to the processing facility.</p> <p>All the fish consignments are accompanied by bill of delivery. This includes the following information: vessel name, landing date, quantity by species, fishing license details etc. This document is signed both by captain</p> |

| Traceability Factor | Description of risk factor if present. Where applicable, a description of relevant mitigation measures or traceability systems (this can include the role of existing regulatory or fishery management controls) |
|--|---|
| | <p>and the driver. There is therefore no risk of certified and non-certified catch being mixed prior to arrival at the processing facilities.</p> <p>Although the herring in the Central Baltic area are MSC-certified, the certificate has been suspended for this UoA. There is therefore a risk that MSC-certified sprat could become mixed with the Central Baltic herring which are not eligible to bear the MSC ecolabel.</p> <p>Because of this risk, sprat caught from ICES Subdivisions SD25-27, 28.2, 29 & 32 are only eligible to enter chain of custody if it can be verified that the consignment of fish is 100% sprat.</p> <p>The risks of mixing of certified and non-certified fish during processing after landing has not been assessed. Processing facilities would require their own MSC Chain of Custody certification.</p> |
| Risks of mixing between certified and non-certified catch during processing activities (at-sea and/or before subsequent Chain of Custody) | <p>No at-sea processing takes place in this fishery; all of the sprat and herring are landed chilled as whole fish. There is therefore no risk of mixing of fish during processing at sea.</p> <p>The risks of mixing of certified and non-certified fish during processing after landing has not been assessed. Processing facilities would require their own MSC Chain of Custody certification.</p> |
| Risks of mixing between certified and non-certified catch during transhipment | <p>Transhipment of fish at sea is prohibited, so there is also no risk of fish from a non-UoC vessel being transferred to a UoC vessel.</p> |
| Any other risks of substitution between fish from the UoC (certified catch) and fish from outside this unit (non-certified catch) before subsequent Chain of Custody is required | <p>The CAB did not identify any other risks related to traceability for this UOA.</p> |

3.1.3 Traceability in German UoAs

An assessment of traceability risks is presented in the table below.

Table 3: Traceability Factors within the German UoAs for Baltic Sprats (UoA 10)

| Traceability Factor | Description of risk factor if present. Where applicable, a description of relevant mitigation measures or traceability systems (this can include the role of existing regulatory or fishery management controls) |
|--|---|
| Potential for non-certified gear/s to be used within the fishery | <p>None. The UoC vessels are all permitted to use pelagic / mid-water trawls only. Vessels are restricted to a single gear type per trip.</p> <p>Vessels are inspected both in port and at sea (see section 6.4.7 of the PCR). Inspectors check that the correct fishing gear is in use. Catch and landings declarations also have to specify the type of fishing gear used. The level of monitoring and reporting required minimises the risk of non-certified gear being used in the fishery.</p> |
| Potential for vessels from the UoC to fish outside the UoC or in different geographical areas (on the same trips or different trips) | <p>The only adjacent waters where herring or sprat may be caught are the Russian EEZ (where UoA vessels are not permitted to fish); the Gulf of Riga (none of the German UoA vessels are permitted to fish here); and the Western Baltic (ICES sub-divisions SD22-24, where UoA vessels are permitted to fish).</p> <p>The EU CFP and its daughter regulations require that all movements of vessels >12m LOA are monitored using VMS (see Error! Reference source not found.) which allows for independent and continuous monitoring of activity. All vessel catches are recorded in e-logbooks, and all landings are recorded in a statutory landing declaration, each of which identify the location of fishing activity. Sales notes for batches of fish can be reconciled with landing declarations and logbooks, so all fish can be traced back to the area where they were caught.</p> |

| Traceability Factor | Description of risk factor if present. Where applicable, a description of relevant mitigation measures or traceability systems (this can include the role of existing regulatory or fishery management controls) |
|--|--|
| | <p>The CAB considers that although some of the vessels may fish outside the UoC from time to time, the statutory monitoring arrangements in place ensure that the risk of fish from outside the UoC being mixed with certified fish is low.</p> |
| <p>Potential for vessels outside of the UoC or client group fishing the same stock</p> | <p>A list of UoC vessels is provided in Table 53 of the PCR.</p> <p>Both the Central Baltic Herring and Baltic Sprat stocks are fished by non-certified vessels, and these could land at Danish ports.</p> <p>All landings are reported and recorded, and quantities of fish landed are reconciled with logbook catch records. This ensures that the processing factory is able to identify the vessel which caught a particular consignment of fish.</p> <p>The statutory controls and checks in place ensure that fish caught by non-UoC vessels can be distinguished from certified fish prior to the start of any processing operations. The risk of fish caught by non-UoC vessels becoming mixed with fish from UoC vessels prior to processing starting is therefore considered to be low.</p> |
| <p>Risks of mixing between certified and non-certified catch during storage, transport, or handling activities (including transport at sea and on land, points of landing, and sales at auction)</p> | <p>Fish can only be landed at designated ports (see the list in Table 38 of the PCR).</p> <p>Fish are landed directly from the UoA vessels to processing factories. The fish landed for industrial purposes are landed unsorted. The factories record the vessel name and landing details, which enables the landings to be traced back to fishing areas.</p> <p>Although the herring in the Central Baltic area are MSC-certified, the certificate has been suspended. There is therefore a risk that MSC-certified sprat could become mixed with the Central Baltic herring which are not eligible to bear the MSC ecolabel.</p> |

| Traceability Factor | Description of risk factor if present. Where applicable, a description of relevant mitigation measures or traceability systems (this can include the role of existing regulatory or fishery management controls) |
|---|---|
| | <p>The fishing companies organised in the Erzeugergemeinschaft der Nord- und Ostseefischer GmbH fish specifically for sprat in the central Baltic Sea. The central herring stock is not targeted directly, but landed as by-catch in the sprat fishery.</p> <p>The catch is pumped unsorted into tanks on board of the fishing vessel and landed for further industrial processing. In most cases, this takes place at Danish partner companies that have signed supply agreements with our fishing companies.</p> <p>During landing, several samples are taken by an independent inspector, who determines the catch composition and its settlement. Copies of these records have been provided as evidence to the CAB.</p> <p>Because of the risk that Central Baltic herring may part of the catch, sprat caught from ICES Subdivisions SD25-27, 28.2, 29 & 32 are only eligible to enter chain of custody if it can be verified that the consignment of fish is 100% sprat.</p> |
| Risks of mixing between certified and non-certified catch during processing activities (at-sea and/or before subsequent Chain of Custody) | <p>No at-sea processing takes place in this fishery; all of the sprat and herring are landed chilled as whole fish. There is therefore no risk of mixing of fish during processing at sea.</p> <p>The risks of mixing of certified and non-certified fish during processing after landing has not been assessed. Processing facilities would require their own MSC Chain of Custody certification.</p> |
| Risks of mixing between certified and non-certified catch during transhipment | <p>Transhipment of fish at sea is prohibited, so there is also no risk of fish from a non-UoC vessel being transferred to a UoC vessel.</p> |
| Any other risks of substitution between fish from the UoC (certified catch) and fish from | <p>The CAB did not identify any other risks related to traceability for this UOA.</p> |

| Traceability Factor | Description of risk factor if present. Where applicable, a description of relevant mitigation measures or traceability systems (this can include the role of existing regulatory or fishery management controls) |
|--|--|
| outside this unit (non-certified catch) before subsequent Chain of Custody is required | |

3.1.4 Traceability in Swedish UoAs

An assessment of traceability risks is presented in the table below.

Table 4: Traceability Factors within the Swedish UoAs for Baltic Sprats (UoAs 12 & 14)

| Traceability Factor | Description of risk factor if present. Where applicable, a description of relevant mitigation measures or traceability systems (this can include the role of existing regulatory or fishery management controls) |
|--|--|
| Potential for non-certified gear/s to be used within the fishery | <p>None. The UoC vessels are all permitted to use pelagic / mid-water trawls only. Vessels are restricted to a single gear type per trip.</p> <p>Vessels are inspected both in port and at sea (see section 6.4.7 of the PCR). Inspectors check that the correct fishing gear is in use. Catch and landings declarations also have to specify the type of fishing gear used. The level of monitoring and reporting required minimises the risk of non-certified gear being used in the fishery.</p> |
| Potential for vessels from the UoC to fish outside the UoC or in different geographical areas (on the same trips or different trips) | <p>The only adjacent waters where herring or sprat may be caught are the Russian EEZ (where UoA vessels are not permitted to fish); the Gulf of Riga (none of the Swedish UoA vessels are permitted to fish here); and the Western Baltic (ICES sub-divisions SD22-24, where UoA vessels are permitted to fish).</p> <p>The EU CFP and its daughter regulations require that all movements of vessels >12m LOA are monitored using VMS (see Figure 28 & 29 of the PCR) which allows for independent and continuous monitoring of activity. All vessel catches are recorded in e-logbooks, and all landings are recorded in a statutory landing declaration, each of which identify the location of fishing activity. Sales notes for batches of fish can be reconciled with landing declarations and logbooks, so all fish can be traced back to the area where they were caught.</p> |

| Traceability Factor | Description of risk factor if present. Where applicable, a description of relevant mitigation measures or traceability systems (this can include the role of existing regulatory or fishery management controls) |
|--|--|
| | <p>The CAB considers that although some of the vessels may fish outside the UoC from time to time, the statutory monitoring arrangements in place ensure that the risk of fish from outside the UoC being mixed with certified fish is low.</p> |
| <p>Potential for vessels outside of the UoC or client group fishing the same stock</p> | <p>A list of UoC vessels is provided in Error! Reference source not found. of this report.</p> <p>Both the Central Baltic Herring and Baltic Sprat stocks are fished by non-certified vessels, and these could land alongside Swedish vessels at the Swedish, Danish and Finnish ports used by the SPFPO fleet (see Table 40 of the PCR).</p> <p>All landings are reported and recorded, and quantities of fish landed are reconciled with logbook catch records. This ensures that the processing factory is able to identify the vessel which caught a particular consignment of fish.</p> <p>The statutory controls and checks in place ensure that fish caught by non-UoC vessels can be distinguished from certified fish prior to the start of any processing operations. The risk of fish caught by non-UoC vessels becoming mixed with fish from UoC vessels prior to processing starting is therefore considered to be low.</p> |
| <p>Risks of mixing between certified and non-certified catch during storage, transport, or handling activities (including transport at sea and on land, points of landing, and sales at auction)</p> | <p>The SPFPO has adopted the DFPO Code of Conduct requires that vessels in this UoA must keep any MSC and non-MSC catches separated (see section 6.4.3 and 10.4 of the PCR).</p> <p>Fish can only be landed at designated ports (see the list in Table 40 of the PCR). When fish are landed they are documented and are processed separately from other consignments of fish. No mixing of certified and non-certified fish is therefore possible at the point of landing.</p> |

| Traceability Factor | Description of risk factor if present. Where applicable, a description of relevant mitigation measures or traceability systems (this can include the role of existing regulatory or fishery management controls) |
|--|--|
| Risks of mixing between certified and non-certified catch during processing activities (at-sea and/or before subsequent Chain of Custody) | <p>No at-sea processing takes place in this fishery; all of the sprat and herring are landed chilled as whole fish. There is therefore no risk of mixing of fish during processing at sea.</p> <p>The risks of mixing of certified and non-certified fish during processing after landing has not been assessed. Processing facilities would require their own MSC Chain of Custody certification.</p> |
| Risks of mixing between certified and non-certified catch during transshipment | Transshipment of fish at sea is prohibited, so there is also no risk of fish from a non-UoC vessel being transferred to a UoC vessel. |
| Any other risks of substitution between fish from the UoC (certified catch) and fish from outside this unit (non-certified catch) before subsequent Chain of Custody is required | The CAB did not identify any other risks related to traceability for this UOA. |

Table 5: Traceability Factors within the Swedish UoAs for Gulf of Bothnia Herring (UoAs 7 & 8)

| Traceability Factor | Description of risk factor if present. Where applicable, a description of relevant mitigation measures or traceability systems (this can include the role of existing regulatory or fishery management controls) |
|--|---|
| Potential for non-certified gear/s to be used within the fishery | <p>None. The UoC vessels are all permitted to use pelagic / mid-water trawls only. Vessels are restricted to a single gear type per trip.</p> <p>Vessels are inspected both in port and at sea (see section 6.4.7 of the PCR). Inspectors check that the correct fishing gear is in use. Catch and landings declarations also have to specify the type of fishing gear used. The level of monitoring and reporting required minimises the risk of non-certified gear being used in the fishery.</p> |
| Potential for vessels from the UoC to fish outside the UoC or in different geographical areas (on the same trips or different trips) | <p>The only adjacent waters where herring or sprat may be caught are the Russian EEZ (where UoA vessels are not permitted to fish); the Gulf of Riga (none of the Swedish UoA vessels are permitted to fish here); the Central Baltic (ICES Subdivisions 25-27, 28.2, 29 & 32); and the Western Baltic (ICES sub-divisions SD22-24, where UoA vessels are permitted to fish).</p> <p>All Swedish vessels are required by their fishing licences to remain within a single quota area:-</p> <p style="padding-left: 40px;"><i>3. Under en fiskeresa får fiske endast bedrivas i ett kvotområde. Fisk från andra kvotområden får inte behållas ombord under samma fiskeresa.</i></p> <p style="padding-left: 40px;">[3. During a fishing trip, fishing may only be conducted in one quota area. Fish from other quota areas may not be retained on board during the same fishing trip.]</p> <p>The EU CFP and its daughter regulations require that all movements of vessels >12m LOA are monitored using VMS (see Figure 28 & 29 of the PCR) which allows for independent and continuous monitoring of activity. All vessel catches are recorded in e-logbooks, and all landings are recorded in a statutory landing declaration, each of which identify the location of fishing activity. Sales notes for batches of fish can be reconciled with landing declarations and logbooks, so all fish can be traced back to the area where they were caught.</p> |

| Traceability Factor | Description of risk factor if present. Where applicable, a description of relevant mitigation measures or traceability systems (this can include the role of existing regulatory or fishery management controls) |
|--|---|
| | <p>The CAB considers that although some of the vessels may fish outside the UoC from time to time, the statutory controls set out in the fishing licence and the monitoring arrangements in place ensure that the risk of fish from outside the UoC being mixed with certified fish is low.</p> |
| <p>Potential for vessels outside of the UoC or client group fishing the same stock</p> | <p>A list of UoC vessels is provided in Table 55 of the PCR.</p> <p>Both the Central Baltic Herring and Baltic Sprat stocks are fished by non-certified vessels, and these could land alongside Swedish vessels at the Swedish, Danish and Finnish ports used by the SPFPO fleet (see Table 40 of the PCR).</p> <p>All landings are reported and recorded, and quantities of fish landed are reconciled with logbook catch records. This ensures that the processing factory is able to identify the vessel which caught a particular consignment of fish.</p> <p>The statutory controls and checks in place ensure that fish caught by non-UoC vessels can be distinguished from certified fish prior to the start of any processing operations. The risk of fish caught by non-UoC vessels becoming mixed with fish from UoC vessels prior to processing starting is therefore considered to be low.</p> |
| <p>Risks of mixing between certified and non-certified catch during storage, transport, or handling activities (including transport at sea and on land, points of landing, and sales at auction)</p> | <p>The SPFPO has adopted the DFPO Code of Conduct requires that vessels in this UoA must keep any MSC and non-MSC catches separated (see section 6.4.3 & 10.4 of the PCR).</p> <p>Fish can only be landed at designated ports (see the list in Table 40 of the PCR). When fish are landed they are documented and are processed separately from other consignments of fish. No mixing of certified and non-certified fish is therefore possible at the point of landing.</p> |

| Traceability Factor | Description of risk factor if present. Where applicable, a description of relevant mitigation measures or traceability systems (this can include the role of existing regulatory or fishery management controls) |
|--|--|
| Risks of mixing between certified and non-certified catch during processing activities (at-sea and/or before subsequent Chain of Custody) | <p>No at-sea processing takes place in this fishery; all of the sprat and herring are landed chilled as whole fish. There is therefore no risk of mixing of fish during processing at sea.</p> <p>The risks of mixing of certified and non-certified fish during processing after landing has not been assessed. Processing facilities would require their own MSC Chain of Custody certification.</p> |
| Risks of mixing between certified and non-certified catch during transshipment | Transshipment of fish at sea is prohibited, so there is also no risk of fish from a non-UoC vessel being transferred to a UoC vessel. |
| Any other risks of substitution between fish from the UoC (certified catch) and fish from outside this unit (non-certified catch) before subsequent Chain of Custody is required | The CAB did not identify any other risks related to traceability for this UOA. |



4 Template information and copyright

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