

MSC Inseparable or Practicably Inseparable (IPI) Announcement

*Annette Islands Reserve salmon
 April 25, 2022*

Marine Stewardship Council IPI announcement

Table 1 – Inseparable or practicably inseparable (IPI) catches

1	Description of the stock(s) identified as Inseparable or Practicably Inseparable (IPI)
	<p>The assessment team has assessed IPI harvest within the UoA based on FCRV2.01 Annex SC6.1.</p> <p>All potential IPI stocks are non-local stocks of the same species as the P1 target (SC6.1.1b), including Chinook, Coho, Sockeye, Pink, and Chum salmon species.</p> <p>Based on catch data from the most recent five years (SC6.1.2), the assessment team has determined that the potential harvest of non-UoA stocks that are not already certified (Annex SC6.1.1) is <5% of total UoA harvest (Annex SC6.1.1.2a).</p> <p>For IPI stocks outside of biologically based limits, the assessment team has found that the UoA does not catch a significant portion of the total catch of the IPI stock, and it is highly likely not to significantly hinder its recovery, and practical measures have been implemented to reduce impacts on the stock (SC6.1.1.2b).</p> <p>This includes any potential harvest of ETP salmon (excluded from requirement 7.4.13.1.d based on SC6.1.1.2b).</p>
2a	Justification to indicate fish and fish products from IPI stocks may enter further chains of custody
	<p>In the case of salmon fisheries in the MSC system (MSC FCRV2.0 SC6.1), there are distinct IPI requirements. According to Annex SC6.1, IPI stocks in salmon fisheries are only IPI if not certified separately and either:</p> <ul style="list-style-type: none"> SC 6.1.1.a: Non-target species (scored in P2, not P1), OR SC 6.1.1 b: Non-local stocks of species targeted in the fishery (i.e., stocks that are caught in the fishery but do not breed within the UoA and are not therefore normally scored as part of the SMU) <p>No salmon caught in Southeast Alaska (SEAK) fisheries, including those on the Annette Islands Reserve (AIR), are certified separately. SEAK salmon fisheries catch British Columbia (BC) salmon which were previously certified, but the BC salmon fishery certification was self-suspended in 2019. The Alaska state commercial salmon fisheries in Southeast Alaska are subject to a separate certification (recertified in 2019), but both the Alaska State and AIR fisheries harvest the same stock management units.</p> <p>In the case of the Annette Islands Reserve salmon fishery, there is no commercial retention of any non-target species considered inseparable (option a), and therefore only (b) may apply in the case of target species catch from</p>

non-Southeast Alaskan populations. Accordingly, the team has followed requirements for SC6.1.1.2, rather than SC6.1.1.1. According to SC6.1.1.2a, the total catches from the IPI stock(s) shall not exceed 5% by weight of the total combined catches of target and IPI stock(s) within the UoA (SC6.1.1.2a).

The assessment team has evaluated IPI stocks on a species-specific basis. Each species section below identifies potential IPI stocks, defined here as catches of the target species originating outside of Southeast Alaska that are not otherwise MSC certified. The SMU of the UoA (Southeast Alaska populations) overlaps with the Southeast Alaska UoA of the Alaska State Salmon MSC Fishery. Metlakatla fisheries harvested approximately 6% of the total salmon catch in combined Annette Island and state fisheries of Southeast Alaska for 2016-2021 (MIC 2021b; Conrad and Thynes 2021). Given that the AIR UoA resides within SEAK, it is also useful to consider IPI calculations reported in the Alaska Salmon MSC assessment (MRAG Americas 2019). The assessment team has therefore referenced the Alaska State certificate where relevant.

Based on a review of relevant catch composition information from the Metlakatla Indian Community, ADF&G, Pacific Salmon Commission, and overlapping and nearby MSC-certified fisheries (Alaska Salmon and BC Salmon), IPI catches do not exceed 5% of total UoA harvest. The lack of IPI harvest is primarily due to two key factors: 1) that most of the interception harvest of non-SMU salmon is comprised of MSC-certified salmon (under the Alaska Salmon certificate), and 2) the terminal focus of the MIC fishery and its geographic restraint to AIR waters. There are no IPI stocks for Pink Salmon, which comprise the majority of the UoA harvest. IPI harvest of other species is extremely low. Although the %IPI for Sockeye is estimated to be around 40%, as described below, impacts on IPI stocks are expected to be minimal due to the small quantities of sockeye harvested in AIR. Overall, considering data from the last 5 years, it is estimated that the IPI harvest comprises less than 2% of the total UoA harvest.

Chinook

Salmon fisheries in the Southeast Alaska, including Metlakatla and state fisheries, harvest a mixture of Chinook stocks originating in Southeast Alaska, Canada, and the US Pacific Northwest (states of Oregon-Washington-Idaho). Chinook stock composition in Alaska commercial fisheries is estimated based on coded micro-wire tag data (CWT) (PSC 2021-JCTC) and genetic stock identification (Shedd et al. 2021). Non-SEAK Chinook harvested in Southeast Alaska fisheries, including the AIR fishery, are not MSC certified and must therefore be considered in IPI requirements.

The large majority of the total Chinook catch in Southeast Alaska commercial fisheries occurs in the state troll fishery (71% in 2016-2020: Conrad and Thynes 2021). Over 90% of Chinook taken in the Southeast Alaska Troll fishery originate from outside of Alaska (PSC 2021; Shedd et al. 2021). The troll fisheries typically operate in "outside" waters and are more likely to intercept migrating stocks. The major contributors to the SEAK troll fisheries ordered from north to south were the Southeast Alaska/Transboundary River, North/Central British Columbia, West Vancouver, South Thompson, Washington Coast, Interior Columbia River Summer/Fall (Su/F), and Oregon Coast reporting groups (Shedd et al. 2021). State troll fisheries in inside SEAK waters, including those operating in southern SEAK adjacent to the AIR, catch predominately Chinook originating from Southeast Alaska rivers and adjacent transboundary rivers with Canada (approximately 65% in 2017 according to Shedd et al. 2021). Local stocks comprise an even greater percentage of the catch in SEAK net fisheries operating in more terminal fishing areas.

Coho

Salmon fisheries in Southeast Alaska, including Metlakatla and state fisheries, primarily harvest Coho Salmon produced in SEAK streams. Fisheries also intercept some Coho originating in British Columbia. BC Coho are not MSC certified and must therefore be considered in IPI requirements. Assessments of Alaska State salmon fisheries identified Coho originating from north and central British Columbia coastal systems and relatively small quantities of Coho taken from transboundary Taku, Stikine, Nass and Skeena runs as IPI (IMM 2013; MRAG Americas 2019).

Coho stock composition in Alaska commercial fisheries is estimated based on coded micro-wire tag data (CWT). Approximately 70-80% of the Coho caught in the AIR are of Tamgas Hatchery origin, based on a 2015 analysis of tag recoveries, run timing and harvest area by the MICDFW (MIC Department of Fish and Wildlife). Approximately 10%

of the harvest is hatchery fish originating from Southern Southeast and Northern Southeast Regional Aquaculture Associations (SSRAA and NSRAA) programs – these are primarily harvested during early season fisheries. Tagged wild Coho have been recovered in AIR fisheries from SEAK sources including Unuk River, Hugh Smith Lake and Whitman Lake populations. The remaining 10% of the harvest is from other wild populations in the region. In AIR waters, only 0.3% of tagged catch originate from hatcheries outside of SEAK (MIC 2016).

Sockeye

Salmon fisheries in the Southeast Alaska, including Metlakatla and state fisheries, harvest Sockeye Salmon produced in SEAK streams and also intercept some originating in British Columbia. BC Sockeye are not MSC certified and must therefore be considered in IPI requirements. The Alaska State MSC certificate identifies four Canadian Sockeye runs as potential IPI runs in SEAK (IMM 2013; MRAG Americas 2019). These include the Taku, Stikine, Nass and Skeena rivers. Only Nass and Skeena Sockeye are harvested in significant numbers in northern boundary area fisheries, which include the AIR and state fisheries of District 1.

Practically all Sockeye harvest in the AIR fishery consists of wild-origin fish originating in waters outside the reserve. Stock composition of wild Sockeye is not estimated within AIR but is likely similar to that estimated for state fisheries in nearby waters of District 1. ADF&G uses genetic stock identification in portions of District 1 to facilitate run reconstructions in collaboration with the Pacific Salmon Commission (Gilk-Baumer et al. 2013). Approximately 60% of the Sockeye purse seine catch for 2010-2015 originated from southeast Alaska waters. Hugh Smith and McDonald Lake Sockeye comprise a substantial proportion of the AIR Sockeye harvest, although the overall majority of the harvests of these two populations occur in state fisheries. Approximately 38% of the average Sockeye catch in District 1 is from the Nass and Skeena Rivers in British Columbia, and about 2% was estimated to come from other Canadian runs (mainly Alsek, Taku, Stikine, Barclay Sound and Fraser).

Pink

Harvest of pink salmon in the Southeast Alaska, including Metlakatla and state fisheries, is almost entirely comprised of fish originating in the Southeast Alaska Pink Salmon stock management unit. Harvests can include small numbers of British Columbia (BC) Pink Salmon. Non-SEAK Pink Salmon harvested Southeast Alaska fisheries, including those of the AIR, are not MSC certified and must therefore be considered in IPI requirements.

Chum

Salmon fisheries in the Southeast Alaska, including Metlakatla and state fisheries, primarily harvest Chum Salmon produced in SEAK streams. Fisheries also intercept some Chum originating in British Columbia. BC Chum harvested in Southeast Alaska fisheries, including those of the AIR, are not MSC certified and must therefore be considered in IPI requirements. Canadian Chum runs harvested in Southeast Alaska include the Taku, Stikine, Nass and Skeena rivers. Only Nass and Skeena Chum are likely harvested in significant numbers in northern boundary area fisheries which include the AIR and state fisheries of District 1.

Both summer and fall Chum are harvested in AIR fisheries. The majority of Chum harvest in the UoA is hatchery-origin. There is no wild Summer Chum originating in the Reserve and few wild Summer Chum in adjacent waters. Wild summer Chum are found primarily in large mainstem systems where they spawn in the upper areas. The large majority of summer Chum in Southeast Alaska are hatchery origin. Harvest of fall Chum in the AIR includes local and non-local, wild and hatchery stocks. Catch composition of Chum Salmon in the AIR commercial fishery was estimated for 2017 by the MIC based on otolith sampling. This data indicates that the majority of the Chum harvest is hatchery fish produced locally by Tamgas Hatchery (~50%), with the rest split between SSRAA release sites of Neets Bay, Kendrick Bay, and Nakat Inlet (MIC 2016b).

2b	Justification to indicate fish and fish products from IPI stocks may enter further chains of custody with an exemption to additional assessment requirements
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Species-specific explanations included below demonstrate that the UoA is not likely to hinder IPI stock recovery, and practical measures have been implemented to reduce impacts on the stock (SC6.1.1.2b).

Salmon IPI stocks may be Endangered, Threatened, or Protected (ETP) (exemption from FCRV2.0 7.4.13.1d) so long as, if the IPI stock is outside of biologically based limits, the team can demonstrate that the catch of the IPI species does not comprise a significant portion of the total catch of the IPI stock, and the UoA is not likely to hinder IPI stock recovery and practical measures have been implemented to reduce impacts on the stock (SC6.1.1.2b). ETP IPI stocks (permitted under SC6.1.1.2b) applicable to this UoA are those listed under the US Endangered Species Act (ESA) and Canada's Species at Risk Act (SARA). As detailed below, the only ETP salmon species with potential for interception by the UoA include select runs of ESA-listed Chinook Salmon. However, there have been no recorded landings of ETP Chinook by the UoA, and as explained further below, potential interception is so low that impact would be negligible and compliant with SC6.1.1.2b. Other ESA-listed salmon runs have been considered, and interception was deemed unlikely (IMM 2013; MRAG Americas 2019).

Chinook

Southeast Alaska (SEAK) fisheries harvest of Chinook stocks from Washington, Oregon and Idaho listed under the Endangered Species Act. This triggers the SC6.1.1.2b requirement to demonstrate that the UoA does not catch a significant portion of the total catch of the stock, and is highly likely not to significantly hinder stock recovery, with practical measures implemented to reduce impacts on the stock. Impacts on ESA-listed Chinook by the AIR commercial salmon fishery are considered negligible and compliant with FCRV2.0 6.1.1.2b.

Impacts on US ESA Chinook stocks are managed under National Marine Fisheries Service (NMFS) consultations consistent with the Pacific Salmon Treaty. The Pacific Salmon Treaty (PST) was renegotiated in 2018, resulting in a new 10-year agreement covering years 2019 to 2028 (Fowler et al. 2021). The 2019 - 2028 PST Agreement includes reductions in harvest impacts for all Chinook fisheries within its scope. This comes on top of the reductions of 15 and 30 percent for those same fisheries that occurred as a result of the prior 10-year agreement (2009 through 2018).

Annual exploitation rates on ESA-listed Chinook stocks in SEAK gillnet fisheries have averaged 1% or less over the last 10 years (PSC-JCTC 2021). No tags have been recovered from ESA-listed salmon in AIR, but potential impacts on ESA-listed stocks are included here. Due to their terminal area focus on local hatchery-origin Chinook, AIR fisheries likely account for a small subset of the total SEAK gillnet fishery impact on ESA-listed Chinook stocks.

Biological Opinions issued by the NMFS for the fisheries establish regional take limits. NMFS has determined, under 2018 Pacific Salmon Treaty agreements, that current exploitation rates in combined fisheries, including those in Alaskan waters, are not likely to jeopardize the continued existence of listed units of Chinook Salmon (NMFS 2019). This conclusion was based on a review of the current status, the environmental baseline for the action area, the effects of the proposed fisheries, and the cumulative effects. These Biological Opinions require regulatory actions to stay within the limits.

Coho

BC Coho Salmon are not listed under the Canadian Species at Risk Act, hence, there are no related requirements under SC6.1.1.2b. The catches of BC origin salmon in Southeast Alaska are governed under terms of the Pacific Salmon Treaty (PST). PST based conservation and harvest sharing agreements were renewed in 2009. The Treaty does not establish specific harvest sharing arrangements for Canadian-origin Coho Salmon caught in Alaska. However, the treaty does require that neither Party may redirect its fisheries in a manner that would be designed to intentionally increase interceptions of the other Party fish. English et al. (2012) estimated exploitation rates in Alaska fisheries of 14-37% for Coho originating from northern BC coastal areas and 3-8% from central BC coastal areas, during 2006-2010. Rates would be much lower for AIR based on its terminal focus and low harvest volumes.

The Treaty also includes conservation and harvest sharing arrangements for salmon including Coho that return to the Transboundary Taku and Stikine rivers that originate in Canada's Yukon Territory and are harvested, in part, in Southeast Alaska fisheries. In general, the treaty requires the Parties to manage their fisheries to achieve escapement goals, share available surplus production in specific ways, and participate in joint enhancement programs. Salmon runs in transboundary rivers are actively managed with programs to provide in-season estimates

of catch and escapement, and parties share this information as it becomes available. Overall, the Treaty's provisions to meet escapement goals and share the harvest have generally been met (PSC-JTTC 2020). The Joint Transboundary Technical Committee provides estimates of the catch, by species of transboundary river stocks in the Southeast fisheries (PSC-JTTC 2017). The Alaska State fishery assessment (MRAG Americas 2019) reported that the total weight of transboundary Sockeye and Coho Salmon caught in 2011 – 2015 represented just 0.2% of the overall catch.

The available data on catch composition in the UoA, geographic restraint to AIR waters, and relatively small magnitude of the AIR fishery suggests exploitation rates by the UoA on BC Coho stocks are much lower than those of the broader SEAK State fishery, and that the UoA does not catch a significant proportion of the total catch of those stocks.

Sockeye

BC Sockeye Salmon are not listed under the Canadian Species at Risk Act, hence, there are no related requirements under SC6.1.1.2b. The catches of BC origin salmon in Southeast Alaska are governed under terms of the Pacific Salmon Treaty (PST). PST based conservation and harvest sharing agreements were renewed in 2009. Treaty agreements for Sockeye are "abundance based" where the allowable harvest is a percentage of the Annual Allowable Harvest (AAH) relative to total return of applicable stocks and escapement goals. Catches over, or under, the AAH each year are summed over the period of the agreement to allow for annual variation. In Alaska's District 104 purse seine fishery, the allowable catch is 2.45% of the AAH of Sockeye Salmon returning to the Nass and Skeena rivers prior to Alaska's Statistical Week 31, which signals the beginning of directed Pink Salmon management. In Alaska's District 101 drift gillnet fishery, the allowable catch is 13.8 percent of the AAH of Sockeye Salmon returning to the Nass River. The Joint Transboundary Technical Committee provides estimates of the catch by species of transboundary river stocks in the Southeast fisheries (PSC-JTTC 2020). Actual catches have generally varied around or below the agreed limits.

Estimated exploitation rates in Alaska for Sockeye Salmon originating from key North Coast/Central Coast statistical areas were 1% to 24% during 2006-2008 (English et al. 2012). Based on the relative Sockeye catches of state and AIR fisheries, the AIR fishery would account for less than 20% of the total exploitation in SEAK salmon fisheries.

The available data on catch composition in the UoA, geographic restraint to AIR waters, and relatively small magnitude of the AIR fishery suggests exploitation rates by the UoA on BC Sockeye stocks is much lower than the broader SEAK State fishery, and that the UoA does not catch a significant proportion of the total catch of those stocks.

Pink

BC Pink Salmon are not listed under the Canadian Species at Risk Act, hence, there are no related requirements under SC6.1.1.2b. The Pacific Salmon Treaty does not establish harvest sharing arrangements for BC-origin Pink Salmon caught in Alaska. Harvest rates of BC Pink Salmon in SEAK commercial salmon fisheries are low. English et al. (2012) estimated exploitation rates of 8-9% for Pink Salmon originating from British Columbia and caught in Southeast Alaska for the years 2006-2010. The AIR fishery accounted for just 5% of the total SEAK commercial salmon fishery harvest of Pink Salmon in 2016-2020 (MIC 2021; Conrad and Thynes 2021). Thus, AIR fishery impacts on BC Pink Salmon are relatively insignificant.

Chum

BC Chum Salmon are not listed under the Canadian Species at Risk Act, hence, there are no related requirements under SC6.1.1.2b. However, North Coast BC Chum stocks escapements have generally fallen below historical escapement targets in recent years (PSC-JNBTC 2020).

The only provision in the Pacific Salmon Treaty for Chum Salmon in the Northern Boundary Area is that neither Party shall conduct net fisheries in the Portland Canal, described as Alaskan Section 1A and Canadian sub-areas 3-15 and 3-16, nor conduct directed Chum fisheries in Alaskan Section 1B north and east of Akeku Point or in Canadian sub-areas 3-11 and 3-13, unless agreed otherwise by the Parties (MRAG Americas 2019). Such strategies have proven effective in decreasing exploitation of North Coast BC Chum, but it is considered that environmental

factors may also play a significant factor in the declined stock status (IMM 2013). North Coast BC Chum escapements have been improving with the added protection provided by management actions (PSC-JNBTC 2020).

Estimates of the average exploitation rates in Alaska were made by assuming exploitation rates similar to that of Sockeye Salmon from the Nass and Skeena Rivers, adjusted for run timing (English et al. 2012). Estimates of harvest rates for BC north coast statistical areas 3 (including Portland Canal), 4 and 5 for the period 2006 - 2010 were 24%, 10% and 10% respectively.

The available data on catch composition in the UoA, geographic restraint to AIR waters, and relatively small magnitude of the AIR fishery suggests exploitation rates by the UoA on North Coast BC Chum stocks is much lower than the broader SEAK State fishery, and that the UoA does not catch a significant proportion of the total catch of those stocks.

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A controlled document list of MSC program documents is available on the [MSC website](http://msc.org) (msc.org)

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