



Sian Morgan
SCS Global Services

Sent by email

Date: 23 May 2016

Subject: Request for variation to the MSC Certification Requirement CR v2.0 Annex PB2.2 for the Annette Islands Reserve salmon fishery

Dear Sabine,

I write with reference to your submission on 23 May 2016 of a request for variation to the MSC Certification Requirement (CR) to allow variation to the harmonization requirement of Annex PB2.2 to use the same assessment tree as an overlapping fishery certified in the last 5 years, in this case the Alaska State salmon fishery, which was assessed under a modified assessment tree under CRV1.3 (prior to release of V2.0 Annex SC).

As you are aware, the CR procedures relating to defining the Unit of Certification and the Unit of Assessment to the harmonization of assessment trees for overlapping fisheries 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 program.

MSC notes the factors presented in your letter supporting your request, including:

- FCR V2.0 GPB2: “MSC requires fisheries to implement the latest version of the certification requirements on reassessment, subject to the timelines defined by the Board. Fisheries using default trees do not therefore have to harmonise their trees with those used in earlier fisheries, even those that are overlapping.”
- MSC released guidance on harmonization via the online interpretation log, which states, “When a new default tree is released for the species group, these should also be adopted instead of any old pre-default version. “
- SCS considers that Annex SC represents best practice in enhanced salmon fishery assessment, collectively developed over years of custom-modified enhanced salmon assessment trees.
- The British Columbia salmon fishery is currently undergoing re-assessment under the V2.0 Annex SC default enhanced salmon fishery tree



- Use of the default enhanced salmon assessment tree is not expected to have a material outcome on the assessment process. Use of Annex SC as a default tree does not require additional stakeholder consultation as would use of a modified default tree. Harmonization considerations will still be undertaken to meet the intent of Annex PB 3.1 that “CABs assessing overlapping fisheries shall ensure consistency of outcomes so as not to undermine the integrity of MSC fishery assessments” and associated guidance “to avoid the perversity that two essentially similar fisheries receive materially different scores (FCR V2.0 GPB3).” Such considerations and harmonization outcomes will be clearly documented in the re-assessment report.

Given the rationale provided, the MSC is willing to grant a variation to the CR in this case subject to the following condition:

- Stakeholders are informed.

If you have any questions regarding this response, please do not hesitate to contact Maylynn Nunn, the Fisheries Assessment Manager for this fishery either by email at maylynn.nunn@msc.org or phone on +61 (0)2 9527 6883.

Best regards,

A handwritten signature in black ink, appearing to read 'Stephanie Good'.

Stephanie Good
Senior Fisheries Certification Manager

Marine Stewardship Council
CC: ASI, lead auditor