

Bureau Veritas Certification Holding SAS

MUSSEL RAFT CULTURE IN GALICIA (MEJILLÓN DE GALICIA PDO) FISHERY

MSC Variation Request

Table 1 – Variation request

1	Date submitted to the MSC
	2 nd February 2021
2	CAB
	BUREAU VERITAS CERTIFICATION HOLDING SAS
3	Fishery name and certificate number or CoC certificate number
	Mussel raft culture in Galicia (Mejillón de Galicia PDO) fishery
4	Lead auditor or program manager
	Macarena García Silva: Macarena.garcia@bureauveritas.com
5	Request prepared by
	Macarena García Silva
6	Scheme requirement(s) for which variation requested
	MSC-FCP-v2.1: 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	How many times has a variation for this requirement been accepted for the same assessment of the same fishery?
	None

Table 2 – Variation justification

1	Proposed variation	
	The CAB requests that the trace back be to the combined UoCs rather than the individual UoCs.	
2	Additional time requested	
	Original deadline date	N/A
	Modified deadline date requested	N/A
	Length of additional time requested	N/A
3	Justification	
	<p>This fishery is an enhanced fishery where two types of spat collection were defined per UoA:</p> <ul style="list-style-type: none">- UoA 1: Collection of spat from intertidal rocks (Catch) using hand tools (scrapers) and on-growing on rafts (Grow).- UoA 2: Collection of spat on ropes at the rafts (Catch) and on-growing on rafts (Grow). <p>The summary of the mussel production cycle explained in the ACDR facilitates the understanding of the traceability at every stage. However, the following additional explanation and a new Table (see below) analyzing the traceability risk of the combined UoCs is going to be included in the PCDR:</p> <ol style="list-style-type: none">1. Seed collection. The seeds can be obtained either from rafts using collecting ropes (UoA2), or from intertidal rocks along the coast (UoA1) by using scrapers. The legislation clearly defines the season where the mussel is allowed to be collected from the natural beds for the UoA1 (Order 26 of October), i.e., from the 1st of December until the 30th of April. As well as the settlement of spat for the UoA2 (Decree 174/2002), that can be done from the 1st of April with possibilities of prolonging it until June or exceptionally July.2. String binders. Mussel seeds of a size of 1-2 cm are carried to the raft or the boat and then placed on the seed ropes for the UoA1. These strings have a maximum length of 12 m and they are crossed by “<i>palillos</i>” every 40-50 cm. <p>In the case of the collecting ropes used to fix the seed of UoA2, they cannot have more than 5 m length counted from the sea level, and must be differentiated from the rest of the strings (seed ropes and growing ropes) by a strong red coloured <i>rabiza</i> with a maximum length of 30 cm. The final size of the mussel from the collector is between 2-4 cm due to the series of settled breeding over already settled breeding while the ropes are in the sea.</p> <p>The seeds’ strings in UoA2 are elaborated and hang out from the raft at least 2 months before the seeds in UoA1.</p> <ol style="list-style-type: none">3. Seed wraps over the rope with the help of a thin biodegradable rayon net, giving the mussel enough time to be on the rope embryo.4. The Unfolding: after 4 to 6 months at sea, when the mussel reaches 4.5 or 5.5 cm, it proceeds to the hoisting mussel ropes. Due to the considerable weight gain of mussels, the splitting of the ropes is necessary, that is, the preparation of new ropes of lower density. This operation, which consists of hoisting mussel ropes, separates juveniles to make new ropes of a lower	

intensity with more homogeneous individuals, in terms of size. At the time of splitting the ropes, the mussel has an average size of 4.5 cm.

As the mussel belonging to the UoA2 has a larger size, the splitting is performed from the end of May until July, in contrast with the one belonging to the UoA1 whose splitting takes place between August and October.

5. **Harvest, selection and transport to the port:** After about a year, the mussel unfold reaches commercial size. The ropes are removed from the water with the help of the ship crane and hoisted. **Is at this point that the separation between mussels it is not commercially feasible due to the practical operation of the fishery that would require significant modification to the existing harvesting and processing methods.** For instance, the mussel harvested for processing (cooking and canning) is around 20.000kg, the mussel has to be separated from the ropes, cleaned and transport to the port in bulk. In addition, the space onboard is limited and the mussels can drop from the ropes. Finally, the producers do the segregation on-board upon client's request, and therefore they could mix between different lots (products from both UoAs) to increase the yield and efficiency of the production.

The analysis of the risk factors of the combined UoCs is described in the following Table:

Factor	Description
<p>Will the fishery use gears that are not part of the Unit of Certification (UoC)? If Yes, please describe:</p> <p>If this may occur on the same trip, on the same vessels, or during the same season; How any risks are mitigated.</p>	<p>The main regulations of the mussel activity: Law 11/2008, Decree 406/1996 (with their modifications) and Order of 26, 2000 sets out the specifications of both spat collection (Catch) and on-growing on rafts (Growth) stages. Further, It is also established in the PDO (Protected Designation of Origin) Product Specification.</p> <p>There are only two authorised ways in Galicia for collecting spat from the environment: using scrappers for the collection of spat from the rocks and/or using collectors placed in the rafts. Both activities are regulated and subjected to regular inspections performed by the <i>Guardacostas</i> Service from the <i>Xunta de Galicia</i> and also by the <i>Guardapescas marítimos</i> hired by the fisher's guilds spread throughout the coast.</p> <p>In terms of traceability records, the Origin Guide and PDO delivery note includes all the relevant information to trace back to the combined UoC such as batch number, mussel production area and the mussel raft, the producer, the quantity to be harvested, the port and the date of unloading. Finally, since 2015 producers have been forced to be included in the REGA (<i>Registro General de Explotaciones Ganaderas</i>). This forces them to keep a diary named "<i>libro de rexistro de explotación de acuicultura en batea</i>" where they must include everything that goes in and out of their rafts.</p> <p>As a conclusion, there is no risk associated to this factor for the combined UoCs.</p>
<p>Will vessels in the UoC also fish outside the UoC geographic area? If Yes, please describe:</p> <p>If this may occur on the same trip; How any risks are mitigated.</p>	<p>The production areas of these <i>Rías</i> will be the maritime space inside the traditional imaginary lines between points, the following production areas being delimited and included in the Order October 26, 2000 (See Section 7.4.1.1).</p> <p>In turn, the following authorized sub-areas or polygons are established in the Orders approved by the <i>Xunta de Galicia</i>, with their corresponding identifications and cartographic references. The information is public and can be found on the web: https://servicio.pesca.mapama.es/acuivisor/</p> <p>An ordering of the cultivation areas was carried out in application of Decree 197/1986, of June 12, establishing 44 production polygons</p>

	<p>distributed among the five Rias. 3,386 rafts are established within the five Rias.</p> <p>The <i>Consejo Regulador Mejillón de Galicia</i> will carry out the necessary periodic checks on board the rafts in order to verify the maintenance of the conditions that gave rise to their registration in the Raft Register and will carry out checks on the cultivation processes that guarantee their subjection to the precepts established in this Specification, taking written record of all this in the corresponding documentation.</p> <p>There is no risk associated to this factor for the combined UoCs.</p>
<p>Do the fishery client members ever handle certified and non-certified products during any of the activities covered by the fishery certificate? This refers to both at-sea activities and on-land activities.</p> <p>Transport Storage Processing Landing Auction</p> <p>If Yes, please describe how any risks are mitigated.</p>	<p>The mussel grown in a raft, taken to port, and immediately transported to the depuration / dispatch center or transformation, accompanied by the document that is part of the traceability system and identifies the batch, so that it reaches the fresh consumer market under the protection of the <i>Mejillón de Galicia</i> PDO, must be in accordance with the standards established in Regulation 853/2004 cited above.</p> <p>The MSC-fisheries certificate will cover the activities performed at sea (catch and grow, harvesting, storage on board) until landing. Change of ownership takes place when the trucks are loaded for transporting the mussels to the processing plants. MSC-CoC is required after landing and before transportation to the processing plants takes place.</p> <p>All mussels harvested by members of the client group would be MSC certified product, so they do not handle non-certified products. Further, all landings are inspected by the <i>Consejo Regulador Mejillón de Galicia</i> to check the quality of the mussels landed and whether they meet the criteria to get the PDO label or not. Producers transport only mussel from one raft of origin in the vessel so this is not mixed in the harbour neither.</p> <p>The depuration / dispatch area is limited to the coastal provinces of A Coruña and Pontevedra in the case of the <i>Mejillón de Galicia</i> PDO.</p> <p>There is no risk associated to this factor for the combined UoC.</p>
<p>Does transshipment occur within the fishery?</p> <p>If Yes, please describe:</p> <p>If transshipment takes place at-sea, in port, or both;</p> <p>If the transshipment vessel may handle product from outside the UoC;</p> <p>How any risks are mitigated.</p>	<p>No transshipment occur within the fishery. Mussel is directly transported from the raft to the harbour where is directly unloaded in the truck of the client (in bags in case of depuration centers or in bulk in case of preserves industry).</p> <p>There is no risk associated to this factor for the combined UoC.</p>
<p>Are there any other risks of mixing or substitution between certified and non-certified fish?</p> <p>If Yes, please describe how any risks are mitigated.</p>	<p>No other risks of mixing or substitution between certified and non-certified mussels for the combined UoC were identified by the team.</p>
<p>The following should also be noted:</p> <ul style="list-style-type: none"> Producers estimate that there is a difference in development of about two months between one seed and the other, so that for the same age the collector mussel is always larger than the rock mussel. UoA1 and UoA2 are clearly different products that producers handle separately and are traceable by the producer himself. In addition, there is a legal requirement to record all movements in the exploitation book since in 2015 all rafts were registered in the REGA, through the Resolution of October 27, 2015. The book must be kept by the raft owner and must be 	

	<p>updated on a regular basis. The technical staff of the <i>Consellería do Mar</i> as well as the National or Community Inspectors can request it to the raft owner.</p> <ul style="list-style-type: none"> As can be seen in the traceability section, before harvesting, producers must notify the administration. This notification is done on-line through the official portal of the <i>Consellería do Mar</i> http://www.pescadegalicia.com, which results in the first pre-harvest traceability document, the Document of Origin, which, in addition to a code, contains information on the mussel production area and the mussel raft, the producer, the quantity to be harvested, the port and the date of unloading. The unloading process is also audited to verify the proper operation, detect failures and establish corrective measures in the PDO self-monitoring system, in data recording and in the issuing of documents. The rafts included in the UoC shall be registered at the <i>Consejo Regulador Mejillón de Galicia</i> and certified for the <i>Mejillón de Galicia</i> PDO. <p>With all the above arguments, the CAB concludes that:</p> <ul style="list-style-type: none"> Traceability at the documentary level is guaranteed since the origin of the seed and its destination is required according to the regulations in force. The traceability is guaranteed from the landing point back to the combined UoC. We are not talking about an ordinary fishery but an aquaculture activity with variable fattening and therefore the seed catches (around 0-20 mm size) cannot be calculated on the basis of mussel landings (around 7-9 cm commercial size). The separation between mussels at the time of harvest and transfer of the mussels to the vessel is not commercially feasible due to the practical operation of the fishery that would require significant modification to the existing harvesting and processing methods.
4	If a fishery assessment, implications for assessment
	Considering that around 77% of the mussel producers use spat collected from rocks, the client assumes that they will stop the assessment of the fishery if the UoA1 (Collection of spat from intertidal rocks) fails. They are not interested on certifying only the UoA2.
5	If a fishery assessment, mitigation of the implications for assessment
	The implication described above is purely an economic one. The client has assessed the option of maintaining UoA2 and it is not interested.
6	If a fishery assessment, how many conditions does the fishery have and will their progress be affected (positive or negative)?
	None.
7	What is the status of the current assessment or audit?
	Preparation of the Public Certification Draft Report.
8	Further comments
9	If applicable, additional information added after the MSC's request

