

Marine Stewardship Council - Variation Request

Date submitted to MSC	November 28, 2016
Name of CAB	SCS Global Services
Fishery Name/CoC Certificate Number	Annette Islands Reserve Salmon
Lead Auditor/Programme Manager	Ray Beamesderfer/Sian Morgan
Scheme requirement(s) for which variation requested	Annex SC
Is this variation sought in order to fulfil IPI requirements (FCR 7.4.14)?	Yes, to fulfil IPI requirements as they pertain to Salmon (Annex SC6.1)

1. Proposed variation

The assessment team has assessed IPI harvest within the UoA based on FCRV2.0 Annex SC6.1. All potential IPI stocks are of the same species as the P1 target (SC6.1.1b). 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). 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). This includes any potential harvest of ETP salmon (excluded from requirement 7.4.13.1.d based on SC6.1.1.2b).

Based on the above, **SCS requests that IPI catches be permitted to enter further chains of custody (Annex SC6.1.3)**. See below for species-specific rationales identifying IPI stocks, proportional contribution to UoA catch, and substantiated support to demonstrate that for IPI stocks outside of biologically based limits that the UoA is highly likely not to significantly hinder recovery and that practical measures have been implemented to reduce impacts.

This variance would permit the entry of IPI stocks of the P1 target species into chains of custody and IPI stocks will be evaluated in accordance with Annex PA.

2. Rationale/Justification

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:

- a) SC 6.1.1.a: Non-target species (scored in P2, not P1), OR
- b) 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)

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 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).

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).

If the above criteria are satisfied based on catch data from the most recent two or more years then a variation request must be submitted to MSC to allow fish or fish products to be considered as coming from IPI stocks to enter further into chains of custody (SC6.1.2-3)

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 (either under the Alaska Salmon certificate or British Columbia Salmon certificates), 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. Overall, considering data from the last 5 years, it is estimated that the IPI harvest comprises less than 2% of the total UoA harvest.

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 (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).

Harmonization for IPI Considerations:

The SMU of the UoA (Southeast Alaska populations) overlaps with the Southeast Alaska UoA of the Alaska State Salmon MSC Fishery (Certified in November 2013). SEAK salmon (including AIR-origin) harvested by the Metlakatla fishers comprises approximately 3% of the SEAK total catch as encompassed in the SEAK UoA in the Alaska State salmon fishery (Conrad and Gray 2016). Given that the AIR UoA resides within SEAK, it is useful to consider IPI calculations per the Alaska Salmon MSC assessment (IMM 2013). The assessment team has therefore referenced the Alaska State certificate where relevant, using Table 6 of the Public Certification Report dated November 2013 and found online: <https://fisheries.msc.org/en/fisheries/alaska-salmon/@assessments>.

Species-specific IPI Evaluations:

The assessment team has evaluated IPI stocks on a species-specific basis. Each species section below identifies potential IPI stocks: catch of the target species originating outside of Southeast Alaska that is not otherwise MSC certified. In addition, where relevant, there is further justification

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).

Chinook

IPI Stocks and Catch

The MSC Alaska State salmon fishery assessment states that 96.2% of Chinook taken in Southeast Alaska originate from outside of Alaska, which accounted for 0.6% of the total salmon harvest in the Southeast Alaska UoA. Non-SEAK Chinook harvest is most likely comprised of transboundary Canada-origin or US (WA-OR-CA) origin Chinook, none of which are MSC-certified. Therefore, non-SEAK Chinook harvested in the AIR UoA must be considered for IPI requirements.

The majority of current Chinook harvest in SEAK occurs in troll (69%) and sport (18%) fisheries - net fisheries account for just 13% of the total (McPherson et al. 2008). Troll fisheries tend to operate outside of terminal fishing areas and are more likely to intercept migrating stocks.

Unlike the State Chinook fishery, the troll fishery in AIR waters represents a minor gear component, contributing <1% of the total Chinook harvested by MIC fishers. In total, Annette fisheries account for just 0.3% of the average annual Chinook Salmon harvest in SEAK waters. According to the 2015 MIC Catch and Escapement Report, tagged king salmon were retrieved from primarily Southeast Alaska hatcheries. It is estimated that this tagged Chinook comprise a very small percentage of the total harvest by MIC-permitted fishers, which focuses on terminal harvest of hatchery Chinook. Based on data from tagged salmon landed, local hatchery production and focused terminal harvest, and lack of use of troll gear in AIR, IPI harvest of Chinook in AIR is considered extremely low relative total Chinook harvest. And, total Chinook harvest comprises less than 0.1% of the UoA salmon harvest on average.

UoA Impacts on IPI Stocks

Most IPI Chinook stocks are considered healthy (IMM 2013), but IPI SMUs may include Endangered Species Act (ESA)-listed populations, triggering 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. No tags have been recovered from ESA-listed salmon in AIR, but potential impacts on ESA-listed stocks are included here, based on findings of the Alaska Salmon MSC assessment.

The Alaska Salmon MSC assessment considered potential harvest of ESA-listed salmon in Southeast Alaska in its most recent full assessment using the 2008 Biological Opinion. The Alaska Salmon MSC assessment team notes that Chinook from Snake River fall-run (0.1% of SEAK Chinook harvest), Puget Sound (~0.28% of SEAK Chinook harvest), Lower Columbia River (~1.88% of SEAK Chinook harvest), and Upper Willamette River (2.22% of Chinook harvest) may be taken in the SEAK fishery (https://www.msc.org/track-a-fishery/fisheries-in-the-program/certified/pacific/alaska-salmon/new-client-2nd-re-assessment-download-documents/20130731_VAR_REQ_SAL2.pdf). The variation request notes that the SEAK fishery accounted for a maximum of 18% of annual catch of any ESA listed ESU, that the incidental take of the ESA-listed species are managed via the Pacific Salmon Treaty, and that the factors other than fishing are considered limiting factors to population growth. Annual exploitation rates on ESA-listed Chinook stocks in SEAK net fisheries typically average 2% or less (PSC 2009). Considering that catch in AIR fisheries would be a small subset of this harvest volume, there is likely proportionally less IPI harvest of Chinook in AIR due to use of net rather than

troll gear in terminal fishing areas, and that no code-wired tags from ESA-listed Chinook runs have been identified in landings from the UoA, impacts on ESA-listed Chinook are considered negligible and compliant with FCRV2.0 6.1.1.2b. Impacts on ESA listed Chinook Salmon are not considered further.

Coho

IPI Stocks and Catch

The Statewide assessment identified Coho originating from British Columbia systems and relatively small quantities of Coho taken from transboundary Taku, Stikine, Nass and Skeena runs as IPI (IMM 2013). None of these are MSC certified, and therefore all are subject to IPI consideration.

In AIR waters, it is estimated that over 90% of the Coho harvest are of SEAK hatchery origin (pers. comm, MIC Fish & Wildlife), with 70-80% of tagged catch originating from Tamgas Creek Hatchery and only 0.3% of tagged catch from hatcheries outside of SEAK (MIC 2016a). Less than 10% of the remaining harvest, then, is comprised of wild Coho populations. Tagged wild Coho have been recovered in AIR fisheries from SEAK sources including Unuk River, Hugh Smith Lake and Whitman Lake populations; and wild Coho also originate from AIR streams. Based on this available evidence, IPI Coho in AIR is considered to be extremely low relative to the total UoA Coho harvest, and Coho comprise <3% of the total UoA salmon harvest on average.

UoA Impacts on IPI Stocks

The Pacific Salmon Treaty includes requirements for US managers to provide for upriver escapement of transboundary stocks. Escapement to the Taku is actively monitored by ADF&G and has been consistently met. Exploitation rates in Alaska fisheries were estimated to be 4%, 4%, 37%, 14%, 5%, 14%, 8%, 8%, 3%, and 3% for Coho originating from BC areas 2E, 2W, 3, 4, 5, 6, 7, 8, 9, and 10, respectively, during 2006-2010. (IMM 2013) Rates would be much lower for AIR based on its terminal focus and low harvest volumes. This information from the State fishery in addition to the extremely low expected volume of harvest of IPI stocks from the UoA is sufficient to conclude that the UoA does not catch a significant proportion of the total catch of IPI Coho stocks.

Sockeye

IPI Stocks and Catch

The Alaska State MSC certificate identifies four transboundary sockeye runs as potential IPI runs in SEAK (IMM 2013). These are fish from the Nass and Skeena rivers that are taken in SEAK District 104 and District 101 fisheries, the Stikine run that is taken in Districts 106 and 108, and the Taku run that is taken in District 111. Sockeye originating in British Columbia rivers south of Alaska (Nass, Skeena, Barclay Sound and Fraser) are MSC-certified (IMM 2010). Stikine and Taku Sockeye are not harvested in significant numbers in District 101 fisheries where the AIR is located.

Approximately 40% of the Sockeye catch in state waters adjacent to Annette Island originates from outside of Alaska based on tissue analysis of ADF&G District 1 Sockeye purse seine harvest (Gilk-Baumer et al 2013). Less than 2% of the Sockeye catch comes from non-certified populations in British Columbia inland from southeast Alaska (Alsek, Taku, Stikine). AIR resides within District 1, so the assessment team has assumed catch composition will be similar to harvest in AIR waters. With IPI stocks estimated at 2% of total UoA Sockeye harvest, IPI sockeye contribution to the total UoA salmon harvest is approximately 0.02%.

UoA Impacts on IPI Stocks

The last ten years of data (2002 – 2011) show that catches of Nass and Skeena fish in these fisheries have consistently been below the annual allowable harvest, while U.S. catches of Stikine and Taku fish have been around or sometimes over the TAC for the years 2007-2009 (PSC 2010, PSC 2013a, PSC 2013b). Escapement for the Stikine and Taku Sockeye have been met in virtually all years. Estimated exploitation rates (ER) in Alaska for Sockeye Salmon originating from key North Coast/Central Coast statistical areas for 1980-2008 were 1% to 24%, during 2006-2008 (IMM 2013). Absolute numbers of fish represented by 2% of AIR Sockeye harvest are extremely low, and this is considered sufficient evidence that the harvest of IPI Sockeye by the UoA will not create a significant impact on the IPI stock(s) as a whole.

Pink

IPI Stocks and Catch

All State of Alaska and British Columbia Pink Salmon, with the exception of Prince William Sound, are MSC-certified. Prince William Sound Pink Salmon are not harvested in southern Southeast Alaska fisheries due to their northern distribution. Therefore, IPI considerations are not relevant to Pink Salmon.

Chum

IPI Stocks and Catch

Total Chum Salmon harvest in Southeast Alaska has averaged 10 million per year since 2000 with hatchery fish comprising approximately three-quarters of the total (Eggers and Heintz 2008; Conrad and Gray 2016). Chum runs in the State of Alaska are MSC-certified, as are the majority of Canadian Chum runs, with the exception of the BC North and Central Coast Chum. For the purposes of the Alaska State MSC certificate, IPI catches of Chum were considered negligible, except for some low level harvest of BC salmon from North Coast statistical area 3, 4 and 5 (IMM 2013).

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. Tagging 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). Considering the substantial contribution of AIR hatchery production to UoA Chum harvest and terminal focus of the fishery, harvest of IPI Chum by the UoA is considered extremely low.

UoA Impacts on IPI Stocks

North Coast wild Chum stocks are considered depressed (DFO 2016). The 2013 Alaska Salmon assessment states the average exploitation rate by Alaska fishers for Chum Salmon from British Columbia north coast statistical areas 3 (including Portland Canal), 4 and 5 for the period 2006 - 2010 was 24%, 10% and 10% respectively. The Pacific Salmon Treaty states prohibits net fisheries in Alaska Section 1A and Canada sub-area 3-15 and 3-16 as well as directed chum fisheries in Alaska section 1B north and east of Akeku Point or Canada sub-area 3-11 and 3-13, unless agreed otherwise. 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).

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. Therefore, the AIR UoA can be considered unlikely to hinder IPI stock recovery. Mark and sampling programs, in addition to the geographic restraint of the fishery, are considered practical measures have been implemented to reduce impacts on the stock.

3. Implications for assessment (required for fisheries assessment variations only)

The assessment process would not be affected. The small volume of IPI harvest would be allowed to enter chains of custody (as defined under FCRV2.0 SC6.1). IPI stocks will be evaluated in accordance with Annex PA, including consideration as a scoring element under Principle 2. The report would include a description of the IPI evaluation, including the content of this variation request and rationale.

4. Have the stakeholders of this fishery assessment been informed of this request? (required for fisheries assessment variations only)

No, Stakeholders will be informed via the MSC website and report if the variation is granted.

5. Further Comments

References:

Conrad, S., and D. Gray. 2016. Overview of the 2016 Southeast Alaska and Yakutat commercial, personal use, and subsistence salmon fisheries. Alaska Department of Fish and Game Fishery Management Report 16-09.

[DFO] Department of Fisheries and Oceans Canada. 2016. Northern Pacific Salmon Integrated Fisheries Management Plan Summary as of 2016. Accessed from: <http://www.pac.dfo-mpo.gc.ca/fm-gp/mplans/2016/smon/smon-nc-cn-2016-sm-eng.html>

Eggers, D.M., C. Tide, A. M. Carrol. 2013. Run Forecasts and Harvest Projections for 2013 Alaska Salmon Fisheries and Review of the 2012 season. Alaska Department of Fish and Game Special Publication 13-03.

Gilk-Baumer, S., S. M. Turner, C. Habicht, and S. C. Heinl. 2013. Genetic stock identification of McDonald Lake Sockeye Salmon in selected Southeast Alaska fisheries, 2007-2009. Alaska Department of Fish and Game Report, Fishery Manuscript Series 13-04.

IMM (Intertek Moody Marine). 2010. British Columbia commercial Sockeye Salmon fisheries. Marine Stewardship Council. London UK.

IMM (Intertek Moody Marine). 2013. Alaska Salmon Fishery Final Determination Report. October 2013. Stewardship Council. London UK. Available at: http://www.msc.org/track-a-fishery/fisheries-in-the-program/in-assessment/pacific/alaska-salmon/new-client-2nd-re-assessment/20131007_FR_SAL002.pdf.

MIC (Metlakatla Indian Community). 2016b. Salmon Enhancement Plan for the Annette Islands Reserve. Metlakatla Indian Community.

6. Inseparable or practicably inseparable (IPI) catches [DELETE IF NOT APPLICABLE]

Is this request to allow fish or fish products from IPI stocks to enter into chains of custody?

Yes

See Section 2: Rationale/Justification above, which includes an IPI evaluation on a per SMU basis, to support how the catches under consideration fulfil the requirements of SC 6.1 and its subclauses. The IPI stocks will be evaluated in accordance with Annex PA.

Is this request to allow an exemption to detailed requirements for IPI stocks?

No

Not applicable for salmon fisheries in accordance with Annex SC6.1.