

Stakeholder Announcement – Change to wording of Units of Assessment/Certification

Canada 0AB 2+3KLMNO Greenland Halibut Bottom Trawl and Gillnet (MSC-F-31450; MSC-F-31454, MSC-F-31455)

14/01/2020

The Canada 0AB 2+3KLMNO Greenland Halibut Bottom Trawl and Gillnet fishery has recently been certified as of the 5th December 2019. At present, the UoAs for the fishery are as follows:

UoA 1

Species:	Greenland halibut (<i>Reinhardtius hippoglossoides</i>)
Stock:	Northwest Atlantic Greenland halibut
Geographical area:	NAFO Division 0A, Canada
Harvest method:	Bottom trawl
Client Group:	AGC & NFA
Other Eligible Fishers:	There are no other eligible fishers.

UoA 2

Species:	Greenland halibut (<i>Reinhardtius hippoglossoides</i>)
Stock:	Northwest Atlantic Greenland halibut
Geographical area:	NAFO Division 0A, Canada
Harvest method:	Gillnet
Client Group:	AGC & NFA
Other Eligible Fishers:	There are no other eligible fishers.

UoA 3

Species:	Greenland halibut (<i>Reinhardtius hippoglossoides</i>)
Stock:	Northwest Atlantic Greenland halibut
Geographical area:	NAFO Division 0B, Canada
Harvest method:	Bottom trawl
Client Group:	AGC, NFA, NC
Other Eligible Fishers:	There are no other eligible fishers



UoA 4

Species:	Greenland halibut (<i>Reinhardtius hippoglossoides</i>)
Stock:	Northwest Atlantic Greenland halibut
Geographical area:	NAFO Division 0B, Canada
Harvest method:	Gillnet
Client Group:	AGC, NFA, NC
Other Eligible Fishers:	There are no other eligible fishers

UoA 5

Species:	Greenland halibut (<i>Reinhardtius hippoglossoides</i>)
Stock:	Northwest Atlantic Greenland halibut
Geographical area:	NAFO Subarea 2 + Divisions 3 KLMNO, Canada
Harvest method:	Bottom trawl
Client Group:	AGC, ASP, NFA, NC
Other Eligible Fishers:	<p>In addition to the harvesting companies who are members of one of the four associations within the client group, there are five companies with fixed gear allocations of Greenland halibut but no fishing capability of their own. They utilize their allocations by entering into sharing arrangements with members of the client group. Three of these companies have joined the client group without being members of any of the four associations.</p> <p>If, at any point in the future, the two remaining companies had catching potential they would be considered to be "other eligible fishers" and, as such could be eligible to join the client group under agreed certificate sharing arrangements.</p> <p>If/when the fishery is certified, the fish they trade will be considered to be MSC certified fish as long as it is caught by a member of the client group.</p>

UoA 6

Species:	Greenland halibut (<i>Reinhardtius hippoglossoides</i>)
Stock:	Northwest Atlantic Greenland halibut
Geographical area:	NAFO Subarea 2 + Divisions 3 KLMNO, Canada
Harvest method:	Gillnet
Client Group:	AGC, ASP, NFA, NC
Other Eligible Fishers:	<p>In addition to the harvesting companies who are members of one of the four associations within the client group, there are five companies with fixed gear allocations of Greenland halibut but no fishing capability of their own. They utilize their allocations by entering into sharing arrangements with members of the client group. Three of these companies have joined the client group without being members of any of the four associations.</p> <p>If, at any point in the future, the two remaining companies had catching potential they would be considered to be "other eligible fishers" and, as such could be eligible to join the client group under agreed certificate sharing arrangements.</p>



	If/when the fishery is certified, the fish they trade will be considered to be MSC certified fish as long as it is caught by a member of the client group.
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When the draft certificate was sent to the client group for review, they highlighted that as it stood at the moment, there were discrepancies between what they had expected to be on the certificate and what was listed as eligible on the certificate.

The following challenges were identified:

- The fishery certificate should cover the selling of product to other members within the client group fishery but not necessarily the ones listed per UoA. For example Quinlan Brothers, who are members of ASP (currently listed in UoAs 5 & 6) could buy product directly from a vessel with allocation in UoA 1 and be eligible to sell on as MSC certified without MSC CoC certification.
- All client groups should be listed as eligible fishers for all UoAs. At the moment this is restricted to specific companies with Association membership as per the UoA descriptions. However quotas may be sold or temporarily transferred with other permit holders/ vessels outside of a specific Association membership where licensing allows it, and if this is the case then those vessels should be allowed to produce MSC eligible product.
- There are two companies which have been assessed, but aren't listed as other eligible fishers. They have chosen not contributed to the cost of the assessment so are not to be certified at this stage but can access to the certificate in the future under an appropriate certificate sharing agreement so should be listed as Other Eligible fishers.

Therefore, we are changing the wording of the UoAs to as follows:

UoA 1

Species:	Greenland halibut (<i>Reinhardtius hippoglossoides</i>)
Geographical area:	NAFO Division 0A, Canada
Method of capture:	Bottom trawl
Stock:	Northwest Atlantic Greenland halibut
Management System:	NAFO, DFO
Client Group:	AGC, NFA, NCC, ASP & Unattributed Fishery Client Companies (Eco Sound Fisheries Corp; Fishermen's Market International Inc.; Ueushuk Fisheries)
Other Eligible Fishers:	In addition to the harvesting companies who are members of one of the four associations within the client group, there are five companies with fixed gear allocations of Greenland halibut but no fishing capability of their own. They utilize their allocations by entering into sharing arrangements with members of the client group. Three of these companies have joined the client group without being members of any of the four associations. If, at any point in the future, the two remaining companies had catching potential they would be considered to be "other eligible fishers" and, as such could be eligible to join the client group under agreed certificate sharing arrangements. If/when the fishery is certified, the fish they trade will be considered to be MSC certified fish as long as it is caught by a member of the client group.

UoA 2

Species:	Greenland halibut (<i>Reinhardtius hippoglossoides</i>)
Geographical area:	NAFO Division 0A, Canada
Method of capture:	Gillnet
Stock:	Northwest Atlantic Greenland halibut
Management System:	NAFO, DFO
Client Group:	AGC, NFA, NCC, ASP & Unattributed Fishery Client Companies (Eco Sound Fisheries Corp; Fishermen's Market International Inc.; Ueushuk Fisheries)
Other Eligible Fishers:	<p>In addition to the harvesting companies who are members of one of the four associations within the client group, there are five companies with fixed gear allocations of Greenland halibut but no fishing capability of their own. They utilize their allocations by entering into sharing arrangements with members of the client group. Three of these companies have joined the client group without being members of any of the four associations.</p> <p>If, at any point in the future, the two remaining companies had catching potential they would be considered to be "other eligible fishers" and, as such could be eligible to join the client group under agreed certificate sharing arrangements.</p> <p>If/when the fishery is certified, the fish they trade will be considered to be MSC certified fish as long as it is caught by a member of the client group.</p>

UoA 3

Species:	Greenland halibut (<i>Reinhardtius hippoglossoides</i>)
Geographical area:	NAFO Division 0B, Canada
Method of capture:	Bottom trawl
Stock:	Northwest Atlantic Greenland halibut
Management System:	NAFO, DFO
Client Group:	AGC, NFA, NCC, ASP & Unattributed Fishery Client Companies (Eco Sound Fisheries Corp; Fishermen's Market International Inc.; Ueushuk Fisheries)
Other Eligible Fishers:	<p>In addition to the harvesting companies who are members of one of the four associations within the client group, there are five companies with fixed gear allocations of Greenland halibut but no fishing capability of their own. They utilize their allocations by entering into sharing arrangements with members of the client group. Three of these companies have joined the client group without being members of any of the four associations.</p> <p>If, at any point in the future, the two remaining companies had catching potential they would be considered to be "other eligible fishers" and, as such could be eligible to join the client group under agreed certificate sharing arrangements.</p> <p>If/when the fishery is certified, the fish they trade will be considered to be MSC certified fish as long as it is caught by a member of the client group.</p>

UoA 4

Species:	Greenland halibut (<i>Reinhardtius hippoglossoides</i>)
Geographical area:	NAFO Division 0B, Canada
Method of capture:	Gillnet
Stock:	Northwest Atlantic Greenland halibut
Management System:	NAFO, DFO
Client Group:	AGC, NFA, NCC, ASP & Unattributed Fishery Client Companies (Eco Sound Fisheries Corp; Fishermen's Market International Inc.; Ueushuk Fisheries)
Other Eligible Fishers:	<p>In addition to the harvesting companies who are members of one of the four associations within the client group, there are five companies with fixed gear allocations of Greenland halibut but no fishing capability of their own. They utilize their allocations by entering into sharing arrangements with members of the client group. Three of these companies have joined the client group without being members of any of the four associations.</p> <p>If, at any point in the future, the two remaining companies had catching potential they would be considered to be "other eligible fishers" and, as such could be eligible to join the client group under agreed certificate sharing arrangements.</p> <p>If/when the fishery is certified, the fish they trade will be considered to be MSC certified fish as long as it is caught by a member of the client group.</p>

UoA 5

Species:	Greenland halibut (<i>Reinhardtius hippoglossoides</i>)
Geographical area:	NAFO Subarea 2 + Divisions 3 KLMNO, Canada
Method of capture:	Bottom trawl
Stock:	Northwest Atlantic Greenland halibut
Management System:	NAFO, DFO
Client Group:	AGC, NFA, NCC, ASP & Unattributed Fishery Client Companies (Eco Sound Fisheries Corp; Fishermen's Market International Inc.; Ueushuk Fisheries)
Other Eligible Fishers:	<p>In addition to the harvesting companies who are members of one of the four associations within the client group, there are five companies with fixed gear allocations of Greenland halibut but no fishing capability of their own. They utilize their allocations by entering into sharing arrangements with members of the client group. Three of these companies have joined the client group without being members of any of the four associations.</p> <p>If, at any point in the future, the two remaining companies had catching potential they would be considered to be "other eligible fishers" and, as such could be eligible to join the client group under agreed certificate sharing arrangements.</p> <p>If/when the fishery is certified, the fish they trade will be considered to be MSC certified fish as long as it is caught by a member of the client group.</p>

UoA 6

Species:	Greenland halibut (<i>Reinhardtius hippoglossoides</i>)
Geographical area:	NAFO Subarea 2 + Divisions 3 KLMNO, Canada
Method of capture:	Gillnet
Stock:	Northwest Atlantic Greenland halibut
Management System:	NAFO, DFO
Client Group:	AGC, NFA, NCC, ASP & Unattributed Fishery Client Companies (Eco Sound Fisheries Corp; Fishermen's Market International Inc.; Ueushuk Fisheries)
Other Eligible Fishers:	<p>In addition to the harvesting companies who are members of one of the four associations within the client group, there are five companies with fixed gear allocations of Greenland halibut but no fishing capability of their own. They utilize their allocations by entering into sharing arrangements with members of the client group. Three of these companies have joined the client group without being members of any of the four associations.</p> <p>If, at any point in the future, the two remaining companies had catching potential they would be considered to be "other eligible fishers" and, as such could be eligible to join the client group under agreed certificate sharing arrangements.</p> <p>If/when the fishery is certified, the fish they trade will be considered to be MSC certified fish as long as it is caught by a member of the client group.</p>

Please note that LR does not consider this to be a change to the scope of assessment for the following reasons:

- The assessment LR undertook on this fishery covered the entire fishery, with every vessel and client group considered for all of the areas as per the Canadian/ NAFO fisheries management descriptions. All vessels with Atlantic wide fixed gear (gillnet) or trawl permits were evaluated against the standard. However not all vessels necessarily have Greenland halibut quota in any given year. Quotas are allocated to licenced harvesters, however, for all of the >100' licences and the vast majority of the >65' licenses; these are Atlantic wide. Most harvesters are either direct members of one or more of the 4 associations already listed on the certificates or have long standing affiliations with members companies within the four associations. However, there is nothing that prevents a quota holder from selling/ temporarily transferring quota to another permit holder, which happens annually. This becomes challenging management of the certificate if there is a specific vessel list (keeping in mind that there are >250 vessels eligible to fish in UoAs 5 & 6, for instance). Many of the association member companies are vertically integrated; they harvest fish, then upon landing, process and wholesale the product. In some cases a company may be hired to go fish someone else's quota in which case they land that fish to the receiving quota owning company who then sell on. This happens infrequently, and is not a problem as the quota owner in the NAFO area fished takes possession from a vessel whose fishing practices/ gear and management system were evaluated by the assessment and are the same as the one they took the quota from. More often, a company which owns quota in an area will sell (or temporarily transfer or trade quota for another species) to another company who will effectively go fish the quota, land to themselves and sell on. This is completely within the management system and is tracked fully by DFO. All transfers or quota sales must be reported and authorized prior to a vessel leaving the dock or else the permit holder can face charges. The Unit of Assessment is only different in written form not in what was actually assessed.
- The separate associations weren't assessed, what was assessed was the entire fishery for the UoA areas/ vessels/ gear on the basis of the legally permitted fishery management system. Associations do not own quota or conduct fishing, they are non-governmental organizations which represent their members in the management and scientific fora of the Canadian fisheries management system. Consideration of all the vessels'/client groups' impact was assessed – we are not adding in anyone new that may impact the sustainability of the fishery or scores of the fishery. The four associations have come to agreement that it would be easier for each of the member companies,



regardless of the relationship with the harvesters/ associations to be listed on the UoAs. It is noteworthy of the collaboration the MSC certificate has driven and maintaining the separation could potentially discourage that.

- There are two companies who own very minor allocations of quota who a) are not members of any association, b) chose to not 'participate' in the certification and c) do not fish those allocations on their own (i.e. a company does not fund a vessel to travel several hundred kms to harvest 1 – 5 tonnes of Gr halibut). However the fact these companies/ allocations exist, means that they need to be listed as 'other eligible fishers'. We therefore propose to include them as 'other eligible fishers' who could join the certificate down the line subject to a certificate sharing agreement.

- We have assessed the traceability systems used by all of the client group members. As described in the PCR, there are limited traceability risks. There are no differences in harvesting processes between associations.

- In the Public Certification Report, we have stated:

“The scope of this certification ends at the first point of sale (at point of landing). Downstream certification of the product will require appropriate certification of storage and handling facilities at these locations.” (Page 165).

This is accurate but what was not explained sufficiently here was that point of landing relates to the vessel offloading under verification of dockside monitor to the company taking possession of the fish (of the companies listed in the UoCs). Chain of Custody will be required beyond that first receiving company. We will make an amendment to the PCR to ensure clarity.

LR have consulted the MSC on this and they are in agreement with our approach. Any queries please contact fisheries-ca@lr.org.

Submitted by: Polly Burns

Fisheries and Aquaculture Operations Manager