STATE OF THE SALMON
KNOWLEDGE ACROSS BORDERS ЗНАНИЕ СКВОЗЬ ГРАНИЦЫ 国境を超えた知識

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Dr. Rob Blyth-Skyrme
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Sent via email

Dear Rob:

State of the Salmon (SoS) appreciates the opportunity to comment on the proposed modified default assessment tree for the Alaska Salmon Fisheries. It is certainly appropriate to modify MSC's default performance indicators and scoring guideposts (PISGs) to reflect the unique population structure of salmon and the artificial production aspects of a number of Alaskan salmon fishery units of certification. These are features that are shared with salmon fisheries across the entire North Pacific.

Intertek Moody Marine (Moody)'s recent announcement indicates that the proposed tree is based upon the assessment tree used for the Northeast Sakhalin Island and Aniva Bay trap net pink salmon fishery (NSIAB) developed by MRAG Americas as amended to reflect a number of changes consistent with the consultation draft of MSC's default assessment tree for salmon (Sam Fam). The announcement further notes that "*the Alaska salmon assessment team intends to use the MSC's proposed new guidance for assessing salmon fisheries where appropriate during the assessment*."

We commend Moody's intention to strive for consistency with recent salmon fishery assessments and to adopt language and guidance from the proposed Sam Fam currently under consultation. It is essential that salmon fisheries competing in the worldwide sustainability market be evaluated under consistent performance criteria. However, it is important to recognize that, while draft Sam Fam requirements and the associated guidance has been informed by limited NGO, government and industry input, these proposals are under public consultation and could change substantially before final adoption. Further, blending NSIAB with selected Sam Fam tree components makes it difficult to track changes to the tree and understand how Sam Fam guidance will be applied. For example, because Moody states they plan to use proposed Sam Fam guidance "*where appropriate*" it is unclear when the guidance will be applied and when it will not. In addition, citing the guidance without referring to specific sections that apply requires the stakeholder to review the draft Annex GCM in order to provide meaningful comments on the proposed Alaska salmon assessment tree, which is not reasonable under the timeline provided.

Our specific comments and recommendations provided below highlight aspects for Moody to modify the proposed tree and clarify the guidance to be used. This approach provides the Alaska client with the greatest future certainty, i.e., by minimizing existing gaps between the proposed assessment tree and the current Russian trees as well as potential future changes to MSC's fishery assessment requirements and guidance for salmon. This would help avoid the possibility

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for creating unexpected and potentially unfavorable outcomes to the durability of the fishery's certification status (if/once recertified). Because of the limited time allowed to review the proposed Alaska salmon assessment tree, we were unable to provide a thorough review of proposed Sam Fam guidance for which unspecified sections will be applied by the assessment team.

General

We presume that Moody is planning to use the same certification units for this second reassessment as with the first, recognizing that certification units with mixed species will evaluate and score management performance for individual species separately. If there are any intended changes to the certification units, we presume that Moody would announce these and provide an opportunity for public review before the site visit and evidence review begins.

Performance Indicator 1.1.1

The proposed language is taken directly from the NSIAB tree but similar to that in Sam Fam. In this case, is Moody proposing to use Sam Fam guidance in relation to performance against the recruitment benchmark (i.e. Lower Evaluation Benchmark) and escapement goals? MSC proposed guidance for PI 1.1.1 [GCM 2.2.5 b] for the SG 80 and 100 states the stock management unit must have met the target reference point in ≥50% of the 10 most recent years. However, Figure GCM2 in Draft Annex GCM suggests that when the escapement goal is defined as a range (as are most Alaska escapement goals, see Munro and Volk 2012), up to 50% of the escapements can be below the lower end of the escapement goal range and meet this threshold. Escapement goal ranges are typically bounded around S_{MSY} (e.g. Eggers 1993, Der Hovanisian et al. 2011). In this case, escapements within the range are already fluctuating around S_{MSY}. Therefore, if 50% of the escapements are below the lower end of the range, the stock is fluctuating below S_{MSY}. This is inconsistent with the stated intent in GCM2.1.4, to maintain the stock "at a level consistent with maximum productivity (B_{MSY} or Proxy)". We suggest the guidance to be modified when the escapement goal is expressed as a range as follows: "fluctuating around" its target reference point means that the stock is meeting its point estimate of S_{MSY} if known, or the mid-point of the escapement goal range if S_{MSY} has not been estimated, ≥50% of the 10 most recent years.

Performance Indicator 1.1.2

We would like to clarify that Moody does not plan to use proposed Sam Fam guidance (GCM 2.3.4.1) to assess whether reference points are consistent with maintaining diversity and productivity of the component populations (scoring issue E in the proposed Alaska assessment tree). Draft guidance described in GCM 2.3.4.1 defines what acceptable proportions of populations/subcomponents are above their reference points. However, in many cases the populations/subcomponents do not have defined reference points, so the issue is really whether reference points reflect the diversity and productivity of the component populations which do not have reference points and may not be monitored annually. Because of this we do not support the guidance proposed in GCM 2.3.4.1 and recommend using other information (e.g. spatial distribution, migration timing, alternate life-histories, etc.) to evaluate whether the reference points maintain the diversity and productivity of the component populations. We believe this is

Moody's intent as the language in the proposed Alaska tree for this PI is taken directly from the NSIAB tree, not Sam Fam.

Performance Indicator 1.1.3

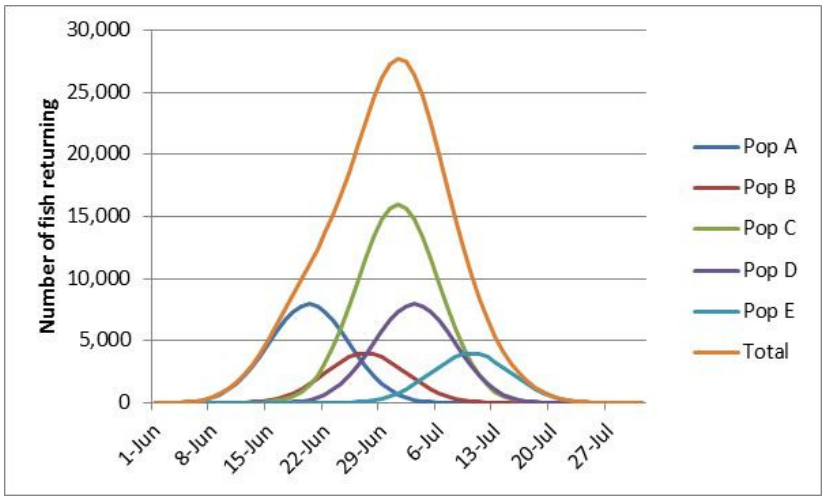
It is unclear how removing the scoring issue "The rebuilding strategy should prohibit targeting of depleted stocks" removes ambiguity and redundancy (as stated in the introductory section). This issue is not specifically identified in any other PI so it would not be redundant to state it here. We recommend that to remove any ambiguity about how this issue will be addressed, the intent be specifically stated as a scoring issue rather than implied. We recommend the scoring issue be modified and added to SG 60 as follows: "The rebuilding strategy should prohibit targeting of depleted stocks or stock components". The fact that management needs to actively protect depleted stock components as part of a robust and precautionary management strategy could also be reflected under 1.2.1 as a matter of maintaining stock status outcomes consistent with PIs 1.1.1 and 1.1.2.

Scoring issue A for SG100 has been changed from both the NSIAB and Sam Fam. We recommend adopting the following modification to make it consistent:

Where stocks are depleted, strategies are demonstrated to be rebuilding stocks continuously and there is strong evidence that rebuilding will be complete within the ~~specified time~~ shortest practicable timeframe which does not exceed one generation for the depleted stock.

Performance Indicator 1.2.3

We note that the language for this performance indicator appears to be taken directly from the NSIAB tree and is substantially different from the Sam Fam tree. We would like to know whether Moody intends to follow the proposed guidance for this performance indicator (GCM2.8). While we support the draft guidance for this PI, it does not provide sufficient guidance to evaluate scoring issue D (PI 1.2.3) in the proposed Alaska assessment tree regarding the significance of fishery harvests on stock components. Stock management units typically consist of a number of populations, each of which may be composed of population subcomponents. These populations may have many distinctive characteristics; for example, spatial distribution, migration timing, and alternate life-histories. One characteristic of diversity that actually can be managed at the level of the SMU is that of run-timing. It is generally understood that the distribution of return timing of an SMU is actually an amalgamate of many smaller distributions in the return timing of populations and subcomponent populations, as in the following example.



Thus, disproportionately high harvest rates on different segments of the migration run (e.g. harvest management practices that ensure a certain amount of escapement followed by heavy fishing) may significantly impact component populations while still achieving escapement goals. In order to ensure maintenance of the diversity of populations and subcomponent populations within stock management units it is important to strive to maintain relatively consistent harvest rates throughout the run. To assess Performance Indicator 1.2.3 scoring issue D we recommend the assessment team review whether the management system is collecting temporal information relevant to catch, escapement and spawning to assess exploitation rates over the fishing season. The scoring of this issue should depend on the resolution of the information and complexity of the stock composition in the stock management unit.

Performance Indicators 1.3.1, 1.3.2 and 1.3.3

Moody has adopted the language for these Performance Indicators directly out of the draft Sam Fam assessment tree (Draft Annex CM). Accordingly, we assume that Moody plans to apply the related draft guidance to these indicators from Draft Annex GCM. It would be helpful to state this under the rationale for these indicators; otherwise the assessment team's intent for interpreting such things as what constitutes the likelihood of "significant negative impacts on the local adaptation, reproductive performance and productivity or diversity of wild stocks" would be unclear. It is incumbent on the team, in the absent of direct evidence of hatchery program impacts on wild stocks under these indicators for Alaska salmon fisheries, to make use of existing literature and best practice regarding recommendations regarding allowable levels of hatchery fish in natural spawning areas (e.g., Paquet et al. 2011; Grant 1997; WDFW 1997; PWS RPT 1994). Both the draft guidance and many existing references recommended specific assessment criteria for hatchery programs that utilize a segregated production and harvest strategy, as is this case for enhanced Alaska salmon fisheries.

Performance Indicator 2.5.1

Moody appropriately chose not to use draft CM and GCM wording for this indicator, which proposes that only local scale be considered when evaluating SGs 60 and 80. There is no logical justification for narrowing the scope of evaluating this indicator as compared to recent MSC salmon fishery assessments.

Principle 3 Performance Indicators

Draft Annex GCM includes important interpretive guidance on scoring Principle 3 indicators for fisheries that utilize artificial production strategies. It would be useful for Moody to indicate in the assessment tree that intends to follow this guidance. For example draft GCM 4.8.2 has guidance regarding decision processes and precautionary management (PI 3.2.2) that appears to be particularly relevant to the Alaska salmon fishery assessment.

Thank you once again for the opportunity to provide input to Moody's proposed assessment tree for the second Alaska salmon fishery reassessment. We look forward to receiving Moody's response as to how our comments were incorporated in the final assessment tree and also to our continued engagement throughout the reassessment process.

Sincerely,

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