



Marine House
1 Snow Hill
London
EC1A 2DH
United Kingdom
Tel: +44 (0)207 246 9800
Fax: +44 (0)207 246 9801

Tim Anderton-Tyers

Accreditation & IT Coordinator

Food Certification International Ltd

Findhorn House, Dochfour Business Centre

Dochgarroch, Inverness, Scotland, UK IV3 8GY

Sent by email

Date: 29 November 2012

Subject: Request for variation to the MSC Certification Requirement CR 27.4.2 for the Samherji Norwegian & Icelandic herring trawl and seine fishery

Dear Tim

I write with reference to your submission on 28th November 2012 of a request for variation to the MSC Certification Requirement (CR 27.4.2) to allow for an additional herring stock (Icelandic summer spawning herring) to be specified within the Units of Certification (UoC) for this assessment. Furthermore, that the existing purse seine UoC to be modified to only include the Icelandic summer spawning herring.

As you are aware, the CR procedures relating to UoC's in CR 27.4.2 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 programme.

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

- That significant landings of Atlantic herring from the Icelandic summer spawning herring stock are made by the client fleet using pure seine as well as pelagic trawl, with a significant mixing of stocks in catches of the pelagic trawl.
- That there was no indication to the CAB prior to the site-visit, that the fishery in fact captured smaller volumes of a second herring stock. The client did not make detailed (broken down by species or stock) catch data available, as they did not realise that this could be relevant as they were seeking certification of a single stock of herring only.
- That although current catches of Icelandic summer spawning herring are low enough to potentially be considered under the IPI methodology (10-12 % of total herring catch), catches will most likely increase in the near future. Therefore it is more appropriate to add Icelandic summer spawning herring to the assessment as early in the process as possible, to enable full transparency from the outset.
- We also note that purse seine is currently not used by the fleet under assessment for pursuing the Icelandic Norwegian spring spawning herring stock and was only included as a 2nd UoC in the certification, in case any member vessels in the future wished to fish in some parts of the Norwegian EEZ
- There was, however, insufficient evidence of usage patterns, catch profiles and impacts to support an assessment.

MSC notes that the inclusion of Icelandic summer spawning herring stock at this stage, prior to scoring, can be regarded as a clarification of the understanding of the stock structure following the site visit. Therefore, this will only serve to increase the resolution of the fishery and its future scoring.

Given the rationale provided and the above comments, the MSC is willing to grant a variation to the CR in this case subject to the following conditions:

- That all previously identified stakeholders are contacted and notified of these changes
- That an additional period of **30 days** is given for stakeholder comment and consultation prior to scoring of the additional Units of Certification
- That an additional site visit is conducted, if stakeholder submissions received indicate that this is necessary.

If you have any questions regarding this response, please do not hesitate to contact Robert Lefébure, the Fisheries Assessment Manager for this fishery either by email, Robert.lefebure@msc.org or phone +44 (0)20 7246 8935.

Best regards,

A handwritten signature in black ink that reads "Dan Hoggarth". The signature is written in a cursive, slightly slanted style.

Dan Hoggarth

Fisheries Oversight director

Marine Stewardship Council

cc: ASI, lead auditor