



MINSA Mackerel Fact Sheet

On behalf of Mackerel Industry Northern Sustainability Alliance (MINSA) members:

- Scotland and N. Ireland: Scottish Pelagic Sustainability Group
- Norway: Norges Sildesalgslag
- Netherlands, Germany, France, England, Poland, Lithuania: Pelagic Freezer-trawler Association
- Denmark: Danish Pelagic Producers Organisation
- Ireland: Irish Pelagic Sustainability Association
- Ireland: Irish Pelagic Sustainability Group
- Sweden: Swedish Pelagic Federation Producer Organization

This fact sheet sets out the events leading to the MINSA Marine Stewardship Council (MSC) suspension, and outlines the process that has ensued to date, which has led to the mackerel suspension being retained. MINSA is aware that there are rumours/stories being circulated in the market that may not be factually correct. This is an attempt by MINSA to document what has actually occurred during that last year.

MINSA remains committed to the sustainability of the mackerel stock with members actively working on a range of issues, including science initiatives and engagement in the mackerel coastal states discussions.

The headline fact is that the mackerel stock is in a healthy state, as documented in the May ICES (International Council for the Exploration of the Sea) advice. MINSA is very confident that this will be further confirmed when the ICES 2020 mackerel advice is released on the 1st October.

Timeline

September 28 2018 – ICES releases the 2019 mackerel advice stating that catches should be no more than 318,413 tonnes. The biomass estimate is assessed to be 2.35m tonnes, below the MSY Btrigger point of 2.57m tonnes. ICES highlights issues with the quality of the assessment relating to RFID (radio-frequency identification) mackerel tagging data, which is one of five data sources underlying the assessment.

October 2018 – Coastal States meet to discuss mackerel management measures for 2019. ICES provides a presentation on the mackerel advice and informs Coastal States that they are convening an inter-benchmark exercise in particular aimed to resolve the significant issues relating to the tagging data.

November 2018 – Given the large uncertainty with the mackerel advice Coastal States decide to reduce the 2019 mackerel

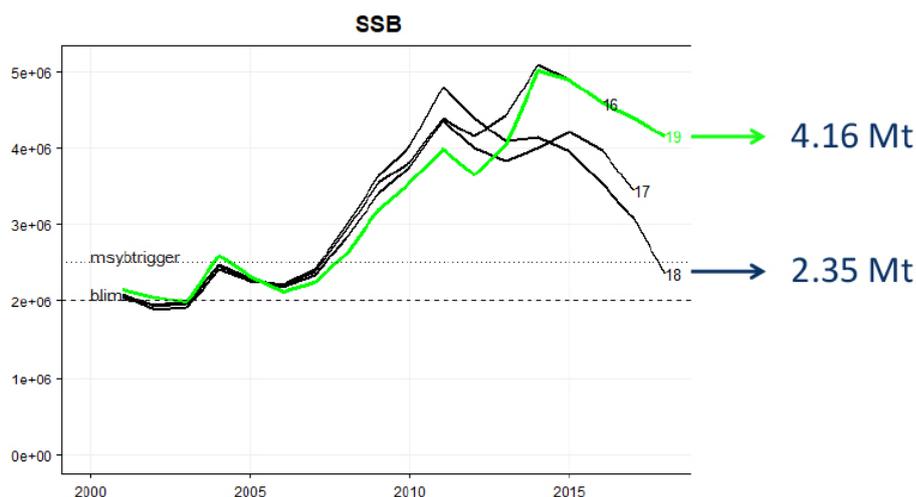
TAC by 20% at 653,438 tonnes. Coastal States agree to meet again once ICES has produced their inter-benchmark report in spring 2019.

November 2018 – The MINSA certifying body Lloyd’s Register (LR) contacts MINSA to state their intention of triggering an expedited audit on the fishery on the back of the ICES advice. MINSA argues that the expedited audit should be delayed until after the ICES inter-benchmark report is issued when there will be new information. This is not accepted by LR and they state they will move to re-score the MINSA fishery and harmonise with the other mackerel certifying bodies (CABs) DNV and SAI as is required by MSC process.

January 2019 – The mackerel CABs harmonised decision is that the mackerel fisheries now score less than 60 in the performance indicator P1 1.2.2c (relating to an agreed Harvest Control Rules being in place). This means that all mackerel fisheries are suspended on 2nd of March, 2019. MINSA drafts a corrective action plan which is accepted by LR and the MSC.

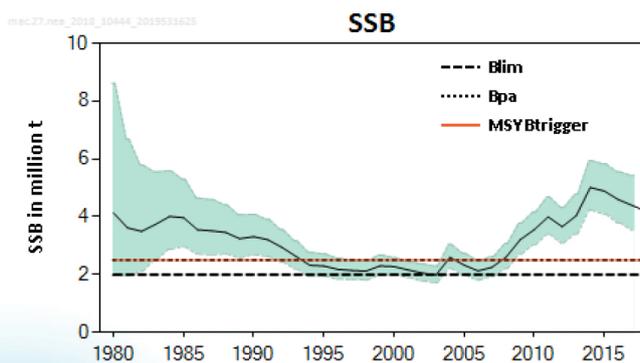
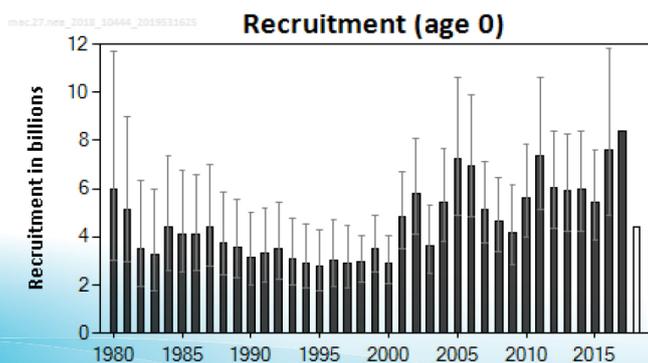
January to March 2019 – ICES undertakes a series of meetings as part of the inter-benchmark culminating with a physical meeting held 4-7 March. The inter-benchmark report is published at the end of March, showing that many of the issues relating to the tagging data have been resolved. But most importantly the new perception of the stock shows the spawning stock biomass (SSB) to be 4.16m tonnes, well above the new MSY Btrigger point of 2.5m tonnes. The stock had never fallen to the 2.35m tonnes as set out in the September 2018 ICES advice. In addition, the stock recruitment looks very positive with the 2016 and 2017 values estimated to be the highest in the time-series.

New perception in SSB: substantial upward revision



April 2019 - Following the release of the ICES advice, MINSA asks LR to review the new stock status and request a re-scoring of the fishery. After a harmonisation meeting between the three CABs, MINSA is informed there is no basis to undertake a re-scoring. This may be reconsidered if ICES publishes a revised TAC advice based on the outcome of the inter-benchmark.

15 May 2019 – ICES publishes a revised 2019 mackerel TAC advice of 770,358 tonnes, which replaces the September 2018 advice, and confirms the revised SSB value of 4.16m tonnes. In addition, the stock recruitment is confirmed to be very positive with the 2016 and 2017 values estimated to be the highest in the time-series.





16 May 2019 – MINSAs again contacts LR to re-submit a request to re-score the fishery. Following a further harmonisation meeting, CABs state that while the stock status is now positive there is no agreed Harvest Control Rule, therefore re-scoring of the fishery is again ruled out.

May 20 and June 12 – Coastal States meet in London to discuss the ICES inter-benchmark report and the revised TAC advice. As new stock reference points have been defined by ICES, a Coastal States request is drafted seeking advice on new Harvest Control Rule options. The request seeks advice on a “shortcut” and “full feedback” option. EU, Norway (MINSAs Coastal States) and Faroe Islands agree to not increase their 2019 quota allocation.

June 13 – MINSAs contacts LR to ask for the annual audit surveillance to be triggered as soon as possible. LR confirms 5 July date for the audit.

July 5 – MINSAs representatives set out a strong case for the fishery to be re-scored positively. This is based on the revised stock biomass status and progress made in requesting advice on harvest control rule options.

LR contacts MINSAs to relay that the assessment had undertaken a re-scoring exercise, marking performance indicator P1 1.2.2c above the 60 pass mark, which would lead to lifting the suspension. However, LR could not take this decision themselves as it would require a harmonised decision agreed by all mackerel CABs. LR hoped this process could be concluded quite quickly.

July 12 – LR contact MINSAs to say that agreeing a date for the harmonisation meeting is proving challenging for DNV and SAI due to securing assessors to undertake the work. A date is finally agreed for 20 August.

August 20 – DNV and SAI field the same P1 assessor for the harmonisation meeting. MSC participates in the meeting. LR makes the case for re-scoring P1 1.2.2c above 60 given the progress made in the last months. The P1 DNV/SAI assessor believes the mackerel fishery should never have been certified and states that inadequate progress has been made on conditions. LR reminds DNV/SAI that the harmonisation meeting is being held to discuss the suspension based on P1 1.2.2c, and whether it can be lifted. DNV/SAI disagree with LR’s position that the suspension can be lifted. DNV/SAI are asked to set out their views in writing to be discussed again at a meeting on 26 August.

26 August – CABs meet again to finalise a harmonised position. DNV/SAI remain of the view the fishery should continue to be suspended, LR disagrees with this position. In the event of no agreement MSC process dictates that the lowest score prevails, therefore suspension remains.

2 September – LR submit a variation request to MSC to disregard the harmonisation outcome and lift the suspension for the MINSAs fishery. MSC states this is not a decision for the body to take and should be referred to the CABs overseeing body, Assurance Services International (ASI). This is a process that is still ongoing, with the harmonisation outcome yet to be finalised.

2 September – CABs publish the formal suspension retention notification on the MSC website.

Our opinion

MINSAs believes there are a number of flaws in the MSC standard which has led to this outcome that could have been avoided. In our view the expedited audit of January 2019 should never have taken place given there was new information about the stock status due in April. It's clear the lack of flexibility to hold back triggering expedited audits is completely unworkable for pelagic fisheries. If the revised May 2019 advice had been available in October 2018 an expedited audit would not have been triggered.

It's also clear that the harmonisation process is deeply flawed. In this case, one assessor has a complete veto in terms of the decision by the MINSAs CAB to lift the suspension, the MINSAs fishery is by far the largest with over 60% of the catches. This is not a fair way to proceed and should be re-visited by the MSC. In the event of non-agreement, it would be far better to resolve the situation using an independent adjudicator to make a judgement.

MINSAs remains committed to the sustainable harvesting of the mackerel stock. In 2013 MINSAs members ended up taking a reduction of 23% in their quota allocation to accommodate the Faroe Islands into the mackerel agreement and to reserve a joint quota share for Iceland, Russia and Greenland who are not part of the mackerel agreement. Since the 2014 three-party agreement, MINSAs Coastal States (EU and Norway) have retained their reduced quota share throughout the period to date.

MINSAs members are involved in a range of scientific measures relating to data collection to help improve the knowledge of the mackerel stock. Industry scientists are working closely with ICES in the provision of data and the stock assessment. Vessels are participating in surveys such as the mackerel egg survey and the IESSNS summer survey. Processing factories are collecting data from the mackerel tagging programme.

MINSAs clients are actively engaged with EU Member States, the European Commission and the Norwegian government to highlight the importance of securing an international fishery agreement. But this takes willing from all sides and to date there has been little practical sign of this from Iceland, Greenland and Russia during negotiations.

The bottom line is the stock is in good healthy state and MINSAs is very confident that the new ICES advice due to be released on the 1st October will further confirm this. It's clear that the MSC standard is constantly changing and this evolution is marginalising MINSAs's ability to retain the fishery in the programme, despite all the good work we are undertaking. At one point the programme could endorse the actions of those undertaking best practice, this is now not possible through processes such as expedited audits and harmonisation. The lines are so blurred now that the market can't distinguish between clients undertaking sustainable practices and those who are not.

