

MRAG Americas Review of the WWF/Coles FIP Scoping Document and Action Plan for the Commonwealth Trawl Sector (CTS) Fishery Improvement Project (FIP)

Overarching comments:

Assuming that the Scoping Document has captured the main issues, it sets out the main potential impediments to certification well. The Action Plan sets out measures that appear appropriately targeted at addressing the deficiencies. Notwithstanding that, we've pointed out below a few areas in the Scoping Document where more information addressing the SG80 guidelines might be helpful. Given any potential full certification of the fishery is likely to commence post 1st April 2015, an important consideration is making sure the actions align with the new MSC Certification Requirements (CR2.0). We have pointed out a few areas in the Action Plan where some revisions might be needed, either now or in conjunction with a review against MSC CR2.0.

We also note there are some multi-step actions in the plan that start with obtaining better information and end with "if there's still a high risk" or "if the impact is still deemed unacceptable". For these, we assume the Action Plan would be reviewed after the initial information gathering exercise is complete.

Comments on the Scoping Document:

For MSC criteria 2.1.2, is there evidence able to be presented consistent with SG80 against scoring issues b and c – i.e. that the ERM measures for these 3 species are working? If these are rated as precautionary high risk – and are therefore presumably highly vulnerable (?) - it would perhaps be helpful to have some discussion in PI 2.1.1 about why they weren't considered main retained species based on vulnerability? In the NPF full assessment, the various ERAEF levels were used to inform scoring – including the use of ABCs to justify why main retained species were likely to be within biologically based limits.

For MSC criteria 2.2.2, the ERA process scored Bight Skate at Extreme High risk, rather than Precautionary Extreme High Risk – presumably this means that there is some evidence from the fishery to suggest there are problems with this species? Unless further evidence is presented its not clear why the current arrangements can demonstrate an objective basis for confidence that they will manage the species at levels which highly likely to be within biologically based limits, or doesn't hinder recovery? Acknowledge that an ID guide was produced, but this is not necessarily a partial strategy.

For MSC criteria 2.3.3, given the discrepancy between observer reports and logbook reports of ETP interactions – is the observer coverage of sufficient scale to meet SG80 irrespective of the weaknesses in logbook reporting?

For MSC criteria 2.4.1, is there evidence (e.g. VMS, or data on the proportion of these habitats closed in MPAs) which shows minimal overlap between trawling activity and high risk habitats? Currently the doc talks about high risk habitats, but not why the fishery meets SG80.

For MSC criteria 2.4.2, it would be useful to provide some indication of trawling activity in habitats rated high risk – the fact that 95% of trawlable area is not fished is useful obviously, however if the

5% trawled was a large proportion of a high risk habitat, this may still cause problems. If there is evidence to cover off easily, best to present it.

For MSC criteria 2.5.1, the fishery has resulted in some stocks – e.g. eastern gemfish –being reduced to very low levels – did the ERA examine the ecosystem impacts of this? If so, would be good to present evidence consistent with SG80.

Comments on the Action Plan:

Section 3.1: This isn't true of the RBF process in CR v2.0. It is also possible to address a medium risk outcome from the CA/PSA by taking measures to lower the RBF risk score (by getting a more accurate, thus potentially less conservative score, idea about the stock productivity; or by reducing the susceptibility risk through changes in fishing behaviour or locations, etc., rather than jump immediately to a stock assessment. I'm not sure if that influences the action plan here, but it's something to consider.

Section 4: New nomenclature in MSC CR2.0 is "primary" or "secondary" species. In this case, both blue warehou and Eastern gemfish would be considered "primary" species.

Section 5: Under the new 2.0 requirements, I think USD might also be considered primary species, because they have "management tools and measures in place intended to achieve stock management objectives reflected in either limit or target reference points". They are rightly classified as "main" here, even under the new requirements, because they are vulnerable. Do they comprise more than 2% of the total catch of the UoA or is the UoA catch more than 10% of the total catch of this species complex?

Action 5.1.4: Do the observers already have this ID training down to the species level for USDs and others? Just as an aside, if they do, this could possibly be drawn upon in designing the e-learning modules for fishermen.