

Date: 4 January 2011

Ref: 82018/82019

Andrew Mallison
Marine Stewardship Council
Mountbarrow House
6-20 Elizabeth Street
London SW1W 9RB
United Kingdom

**VARIATION REQUEST: TAB DIRECTIVE 030
BSAI AND GOA ALASKA POLLOCK FISHERIES
REQUEST FOR INSEPARABLE OR PRACTICALLY INSEPARABLE CATCH TO CARRY THE MSC
ECOLABEL.**

Dear Andrew

Onshore and at-sea Alaska pollock processors produce fish meal and fish oil products as ancillary products. Portions of Alaska pollock that remain after primary products such as fillet blocks and *surimi* are produced are cooked in the fish meal facility. Fish oil is separated in the fish meal production process. The fish oil is used either on site as a clean alternative energy source, or it can be stored and sold for use in products for human consumption.

This letter sets out a request for approval for the inseparable or practically inseparable (IPI) catch from the certified Bering Sea / Aleutian Islands (BSAI) Alaska pollock and Gulf of Alaska (GOA) Alaska pollock fisheries to carry the MSC eco-label. The request is specific to fishmeal and fish oil products that are derived after primary products from the At-sea Processors' Association Alaska pollock fisheries (fillets, surimi and roes) are obtained.

This letter follows the approach described in TAB Directive 030 v.1. Noting Paragraph 4 d of the TAB Directive, we explain in this letter how the fishery products meet the requirements of Paragraphs 4 a-c. We also seek an exemption to paragraphs 6 - 14 of the TAB Directive, as permitted through meeting the requirements set out in Paragraph 5. This request has previously been discussed with the MSC (please see correspondence, Annex 1).

As background, it is noted that the At-sea Processors' Association (APA) entered into a memorandum of agreement (MOA) with the Alaska Fisheries Development Foundation to allow certified Pacific cod bycaught in the BSAI and GOA Alaska pollock fisheries to be eligible to carry the MSC eco-label (Annex 2). APA also entered into an MOA with the Best Use Coalition to also allow certified Alaska flatfish bycaught in the BSAI and GOA Alaska pollock fisheries to be eligible to carry the MSC eco-label (Annex 3). These MOAs were subject to the parties complying with relevant chain of custody and other requirements of the MSC programme. As all of these stocks have been assessed under Principle 1, they are considered 'target stocks' for the purposes of the calculations below.

Moody Marine Ltd
Merlin House
Stanier Way
Wyvern Business Park
Derby DE21 6BF
UK

Tel: +44 (0) 1332 544663
Fax: +44 (0) 1332 675020
Email: enquiries@moodymarine.com
Web Site: www.moodyint.com

Practically Inseparable Catch

This request for approval for IPI catch from the Alaska pollock fisheries to carry the MSC eco-label is undertaken on the basis that the small quantities of non-certified bycatch that may proceed to the fishmeal and fish oil production stages are practically inseparable from target stocks, due to:

- the small proportion of these in the large total quantities involved
- the nature of the process makes separation of catches impractical and wasteful of resources

All bycatches excepting skate and jellyfish (and specific exclusions for salmon, herring, halibut and crab) are processed.

Bering Sea /Aleutian Islands

Table 1: Target and IPI species catch in the BSAI pollock fishery, 2005-2009.

Species	2005	2006	2007	2008	2009
Total pollock catch	1,484,907	1,488,180	1,356,616	991,843	809,467
Pacific cod	7,413	7,285	5,627	6,761	7,876
Yellowfin sole	63	256	86	405	269
Flathead sole	2,352	2,861	4,228	4,209	4,652
Arrowtooth flounder	651	1,088	2,794	1,364	2,143
Alaska plaice	45	11	3	30	176
Rock sole	1,125	1,361	510	1,964	7,534
Total target species (t)	1,496,556	1,501,042	1,369,864	1,006,576	832,117
Pacific Ocean perch	652	737	624	336	114
Atka mackerel	677	789	315	15	25
Sablefish	11	9	12	2	2
Greenland turbot	31	65	107	82	44
All other target species	125	152	188	39	25
Jellyfish	5,084	2,657	2,156	3,722	3,731
Skates	693	1,258	1,182	2,301	1,635
Squid	699	893	962	374	119
Sharks	163	506	214	114	92
Sculpins	140	171	161	254	153
Eulachon	9	87	101	2	2
Eelpouts	1	21	119	7	2
Sea stars	10	11	5	7	5
Grenadier	9	9	11	4	1
Other osmerids	3	5	37	2	0
Octopus	1	2	4	3	4

Moody Marine Ltd
Merlin House
Stanier Way
Wyvern Business Park
Derby DE21 6BF
UK

Tel: +44 (0) 1332 544663
Fax: +44 (0) 1332 675020
Email: enquiries@moodymarine.com
Web Site: www.moodyint.com

Lanternfish	0	10	6	1	0
Sea pens, whips	2	2	4	1	2
Capelin	0	2	1	0	0
Other fish	147	140	198	102	59
Other invertebrates	11	5	6	7	2
Total of potential IPI species (t)	8,468	7,531	6,413	7,375	6,017
Potential IPI species as % of total	0.56	0.50	0.47	0.73	0.72
IPI species (-jellyfish & skate) as % of total	0.18	0.24	0.22	0.13	0.08

Bycatch of IPI species in the BSAI Alaska pollock fishery

The BSAI Alaska pollock fishery has been assessed and certified as being a clean fishery with low levels of bycatch being recorded. Table 1, above, shows the quantities of target and IPI species taken in the fishery for the period 2005-2009. Only provisional data for were available for 2010, so these were not included in this analysis. It should be noted that any catch of salmon, crab, halibut or other prohibited species has not been included in this analysis; these species cannot be landed and so would not be included in the IPI catch that went forward for processing into fishmeal and fish oil.

The figures show the total potential IPI catch in the BSAI pollock fishery varied between 0.47 % and 0.73 % of the total catch from the fishery. Jellyfish and skate are sorted from the catch, however, and do not proceed to processing. Without jellyfish and skate, potential IPI species varied between 0.08 % and 0.24 % of the total catch of target and IPI species.

Stock status of IPI species taken in the BSAI Alaska pollock fishery

Bycatch data for the BSAI Alaska pollock fishery are considered very reliable as nearly all vessels carry observers on all fishing trips. Across the BSAI, at least 86-87 % of all groundfish catches are observed. The stock status of bycatch species taken in the BSAI Alaska pollock fishery is covered in detail in the recent MSC recertification document for the fishery. That assessment relied on the 2009 BSAI stock assessment and fishery evaluation (SAFE) report (North Pacific Fishery Management Council, 2009) for much of the information used. The analysis presented in this letter has relied on the updated BSAI SAFE report for 2010 (NPFMC, 2010).

Table 2: 2010 status of IPI species taken in the BSAI pollock fishery.

Species	Status	Source
Pacific Ocean perch	Not overfished or approaching an overfished condition	BSAI SAFE
Atka mackerel	Not overfished or approaching an overfished condition	BSAI SAFE
Sablefish	Not overfished or approaching an overfished condition	BSAI SAFE
Greenland turbot	Not overfished or approaching an overfished condition	BSAI SAFE

Moody Marine Ltd
Merlin House
Stanier Way
Wyvern Business Park
Derby DE21 6BF
UK

Tel: +44 (0) 1332 544663
Fax: +44 (0) 1332 675020
Email: enquiries@moodymarine.com
Web Site: www.moodyint.com

All other target species	Rockfish- Not overfished or approaching an overfished condition	BSAI SAFE
Jellyfish	Stock estimated at 400,000 t. Unlikely to be at risk	Aydin et al. (2007)
Skates	Not overfished or approaching an overfished condition	BSAI SAFE
Squid	Not being subjected to overfishing	BSAI SAFE
Sharks	No evidence to suggest that overfishing is occurring	BSAI SAFE
Sculpins	Not being subjected to overfishing	BSAI SAFE
Eulachon	Forage fish bycatch species unlikely to be a risk	Aydin et al. (2007)
Eelpouts	Max bycatch < 0.009 % of total	N/A
Sea stars	Max bycatch < 0.0008 % of total	N/A
Grenadier	No applicable catch limits	BSAI SAFE
Other osmerids	No applicable catch limits	BSAI SAFE
Octopus	Max bycatch < 0.0003 % of total	N/A
Lanternfish	Max bycatch < 0.0007 % of total	N/A
Sea pens, whips	Max bycatch < 0.0003 % of total	N/A
Capelin	Forage fish bycatch species unlikely to be a risk	Aydin et al. (2007)
Other fish	Max bycatch < 0.02 % of total	N/A
Other invertebrates	Max bycatch < 0.0008 % of total	N/A

Table 2, above, shows that where bycatch species are directly assessed, the SAFE report concluded that none were being subjected to overfishing. For species managed at Tier 5 or less, the assessments were also able to confirm that those species are not approaching an overfished condition. Other bycatch species that are not assessed are taken in very limited quantities, such that it is highly unlikely that the fishery would constitute a risk to the health of those stocks.

ETP Species in the BSAI Alaska pollock fishery

There are no ETP fish in the BSAI other than some Chinook salmon from threatened stocks; these are already a prohibited species that cannot be retained. No other ETP species (for example, Steller sea lions), that, on an annual basis, might be taken in the fishery in very small quantities, would be included in the IPI catch.

BSAI Conclusion

On the basis of the analyses above, our opinion is that:

- a) The requirements of TAB-D-30 para 4 a)-c) have been met
- b) The requirements of TAB-D-30 para 5 have been met.

Moody Marine Ltd
Merlin House
Stanier Way
Wyvern Business Park
Derby DE21 6BF
UK

Tel: +44 (0) 1332 544663
Fax: +44 (0) 1332 675020
Email: enquiries@moodymarine.com
Web Site: www.moodyint.com

We therefore request approval to allow IPI catches to be included within the scope of this certificate, and an exemption from paragraphs 6-14 of TAB-D-30.

Gulf of Alaska

Bycatch of IPI species in the GOA Alaska pollock fishery

In common with the BSAI Alaska pollock fishery, the GOA Alaska pollock fishery has been certified as being a clean fishery, with low levels of bycatch being recorded. Table 3, below, shows the quantities of target and IPI species taken in the fishery for the five-year period 2005-2009. Data for 2010 were available, but were not included in this analysis as they were provisional only. It should be noted that any catch of salmon, crab, herring or other prohibited species has not been included in this analysis as these species cannot be landed and so would not be included in the IPI catch that went forward for processing into fishmeal and fish oil.

The figures show the total potential IPI catch in the GOA pollock fishery varied between 3.03 % and 6.27 % of the total catch of target and IPI species over the period. Jellyfish and skate are sorted from the catch, however, and do not proceed to processing. Without jellyfish and skate, potential IPI species catch varied between 2.83 % and 6.09 % of the total catch of target and IPI species from 2005-2009.

Moody Marine Ltd
Merlin House
Stanier Way
Wyvern Business Park
Derby DE21 6BF
UK

Tel: +44 (0) 1332 544663
Fax: +44 (0) 1332 675020
Email: enquiries@moodymarine.com
Web Site: www.moodyint.com

Table 3: Target and IPI species catch in the GoA pollock fishery, 2005-2009.

Species	2005	2006	2007	2008	2009
Total pollock catch	80,846	71,976	53,062	52,500	44,003
Pacific cod	352.3	709.8	276.4	578.7	556.3
Flathead sole	180.2	594.4	329.6	414	213.9
Arrowtooth flounder	2313.4	2747.5	1630	1554.6	730.7
Rex sole	21.1	153.6	44.8	57.4	35.5
Total target species (t)	83,713	76,181	55,343	55,105	45,539
Other sharks, skates, squid, sculpin, octopus	924.7	1808.9	678.4	200.6	381.1
Shorthead and rougheye rockfish	32.6	96.5	81.4	101.5	29.7
Pacific Ocean perch	35.5	71.2	29.8	49.9	20.4
Miscellaneous flatfish	4.6	438.8	157	230.2	17
Atka mackerel	3.5	15.2	200.2	0.1	0
Sablefish	3.6	5.6	3.2	1.3	0.1
Dover sole and Greenland turbot	0.7	11.7	5.5	5.8	2.4
Pelagic shelf rockfish complex	2.1	9	6.4	4.1	1.5
Unidentified skate	1.2	5	9.4	5.9	2.5
Big and longnose skate	6.7	35.8	64.8	45.3	63.2
Northern rockfish	0.8	14.5	12	7.9	4.2
Other rockfish complex	1.3	2.5	2	4.5	0.1
Thornyheads	0.3	0.2	0.3	0.2	0.1
Squid	631.5	1517.8	405.2	77.9	313.6
Eulachon	826.8	392.3	219	756.1	216.8
Other osmerids	176.3	167.9	49.2	379.6	145.5
Pacific sleeper shark	199.3	153.5	58.9	47.2	30.2
Scyphozoan jellyfish	184.4	69	23.9	192.1	10.7
Grenadiers	53.9	73.1	4.7	249.3	29
Salmon shark	43.3	31.4	141.6	6.4	6.9
Spiny dogfish	15.8	50	47.6	59.6	17.6
Miscellaneous fish	16.5	38.4	24.1	35	37.9
Big skate	1.7	23	38.1	21.7	33.8
Other skates	36.4	45.9	23	10.2	13
Longnose skate	5	12.7	26.7	23.6	35.1
Large Sulpins	0	1.5	21.8	13.5	5
Sea star	1.1	2	4.7	6.5	0
Pandalid shrimp	7.4	3.1	1.9	0.8	0.1
Capelin	2.8	0.1	0	0	0

Moody Marine Ltd
Merlin House
Stanier Way
Wyvern Business Park
Derby DE21 6BF
UK

Tel: +44 (0) 1332 544663
Fax: +44 (0) 1332 675020
Email: enquiries@moodymarine.com
Web Site: www.moodyint.com

Sculpins	0	2.4	21.8	15.3	5
Sea anemone unidentified	0	0.2	0.7	0.3	0
Miscellaneous crabs	0	0	0.9	0.1	0
Stichaeidae	0	0.1	0.3	0	0
Snails	0	0	0	0.3	0
Sea pens whips	0.3	0	0	0	0
Eelpouts	0.1	0	0	0	0.1
Invertebrate unidentified	0	0	0.2	0	0
Total of potential IPI species (t)	3,220	5,099	2,365	2,553	1,423
Potential IPI species as % of total	3.70	6.27	4.10	4.43	3.03
IPI species (-jellyfish & skate) as % of total	3.44	6.09	3.90	4.00	2.83

Stock status of IPI species taken in the GOA Alaska pollock fishery

Bycatch data for the GOA Alaska pollock fishery are considered reliable. Vessels of 60' - 124'11" are required to carry observers for 30% of the time, while vessels > 125' are required to carry observers at all times. Across the GOA, approximately 25 % of all groundfish catches are observed.

Table 4: 2010 status of IPI species taken in the GOA pollock fishery

Species	Status	Source
Other sharks, skates, squid, sculpin, octopus	Insufficient data on octopus to assess status, but all other species complexes are not being subjected to overfishing	GOA SAFE
Shortraker and rougheye rockfish	Not overfished or approaching an overfished condition	GOA SAFE
Pacific Ocean perch	Not overfished or approaching an overfished condition	GOA SAFE
Miscellaneous flatfish	Deep water complex is not being subjected to overfishing, shallow water complex shows generally increasing trend	GOA SAFE
Atka mackerel	Not being subjected to overfishing	GOA SAFE
Sablefish	Not overfished or approaching an overfished condition	GOA SAFE
Dover sole and Greenland turbot	Limited data but catches much less than TAC	GOA SAFE
Pelagic shelf rockfish complex	Not being subjected to overfishing	GOA SAFE
Unidentified skate	Not being subjected to overfishing	GOA

Moody Marine Ltd
Merlin House
Stanier Way
Wyvern Business Park
Derby DE21 6BF
UK

Tel: +44 (0) 1332 544663
Fax: +44 (0) 1332 675020
Email: enquiries@moodymarine.com
Web Site: www.moodyint.com

		SAFE
Big and longnose skate	Not being subjected to overfishing	GOA SAFE
Northern rockfish	Not overfished or approaching an overfished condition	GOA SAFE
Other rockfish complex	Not being subjected to overfishing	GOA SAFE
Thornyheads	Not being subjected to overfishing	GOA SAFE
Squid	Not being subjected to overfishing	GOA SAFE
Eulachon	Increasing stock size, higher than long-term average	GOA SAFE
Other osmerids	Poorly sampled in surveys, no directed fishing allowed	GOA SAFE
Pacific sleeper shark	Not being subjected to overfishing	GOA SAFE
Scyphozoan jellyfish	Survey data suggests stock biomass is stable	Boldt, 2008
Grenadiers	Not being subjected to overfishing	GOA SAFE
Salmon shark	Not being subjected to overfishing	GOA SAFE
Spiny dogfish	Not being subjected to overfishing	GOA SAFE
Miscellaneous fish	Max bycatch < 0.05 % of total	N/A
Big skate	Not being subjected to overfishing	GOA SAFE
Other skates	Not being subjected to overfishing	GOA SAFE
Longnose skate	Not being subjected to overfishing	GOA SAFE
Large Sculpins	Not being subjected to overfishing	GOA SAFE
Sea star	Max bycatch < 0.05 % of total	N/A
Pandalid shrimp	Max bycatch < 0.05 % of total	N/A
Capelin	Poorly sampled in surveys, no directed fishing allowed	GOA SAFE
Sculpins	Not being subjected to overfishing	GOA SAFE
Sea anemone unidentified	Max bycatch < 0.002 % of total	N/A
Miscellaneous crabs	Max bycatch < 0.002 % of total	N/A

Moody Marine Ltd
Merlin House
Stanier Way
Wyvern Business Park
Derby DE21 6BF
UK

Tel: +44 (0) 1332 544663
Fax: +44 (0) 1332 675020
Email: enquiries@moodymarine.com
Web Site: www.moodyint.com

Stichaeidae	Max bycatch < 0.001 % of total	N/A
Snails	Max bycatch < 0.001 % of total	N/A
Sea pens whips	Max bycatch < 0.004 % of total	N/A
Eelpouts	Max bycatch < 0.0003 % of total	N/A
Invertebrate unidentified	Max bycatch < 0.0004 % of total	N/A

The stock status of bycatch species taken in the GOA Alaska pollock fishery is covered in detail in the recent MSC recertification document for the fishery. That assessment relied on the 2009 GOA stock assessment and fishery evaluation (SAFE) report (North Pacific Fishery Management Council, 2009) for much of the information used. In common with the BSAI data, the analyses presented in this letter has relied on the updated SAFE report for 2010 (NPFMC, 2010).

Table 4, above, shows that where bycatch species are directly assessed, the SAFE report concluded that none were being subjected to overfishing. Also, for species managed at Tier 5 or less, none of the relevant Tier 5 or lower stocks in the GOA are considered to be overfished. Forage fish species that are poorly sampled in survey trawls are not subject to directed fisheries in the GOA. Other bycatch species that are not assessed are taken in very limited quantities, such that it is highly unlikely that the fishery would constitute a risk to the health of those stocks.

ETP Species in the GOA Alaska pollock fishery

There are no ETP fish in the GOA other than some Chinook salmon from threatened stocks; these are already prohibited species that cannot be retained. No other ETP species (for example, Steller sea lions), that on an annual basis might be taken in the fishery in very small quantities, would be included in the IPI catch.

GOA Conclusion

On the basis of the analyses above, our opinion is that:

- a) The requirements of TAB-D-30 para 4 a)-c) have been met
- b) The requirements of TAB-D-30 para 5 are not met as the potential IPI catch was not less than 2 % of the total catch in the previous year. As such, the requirements of paragraphs 6-13 (we note that TAB-D030 refers to 14 paragraphs, but only 13 appear) apply. How the fishery meets or will meet these requirements is specified below.

Para 6: The client acknowledges the requirements laid out in this paragraph, and that the request for approval of GOA Alaska pollock IPI catch to use the MSC eco-label is therefore limited to the initial five-year validity of the most recent fishery certificate (i.e. as commenced 30th September 2010). The measures as listed in Para 6 i, ii or iii shall be addressed as required prior to any future recertification.

Para 7: The status of the stocks of retained species were assessed in the latest GOA Alaska pollock assessment prior to its recent recertification. The conclusions of the latest Stock Assessment and Fishery Evaluation report are also listed in Table 4, above. For all species where an assessment is made, the stocks were assessed as not being overfished, and the few species for which data are too limited to allow an assessment are taken in very limited

Moody Marine Ltd
Merlin House
Stanier Way
Wyvern Business Park
Derby DE21 6BF
UK

Tel: +44 (0) 1332 544663
Fax: +44 (0) 1332 675020
Email: enquiries@moodymarine.com
Web Site: www.moodyint.com

quantities (< 0.05 % of the total catch, and in many cases much less). Also, no directed fisheries for forage fish species (e.g. Euchalon and capelin) are permitted in the GOA, which would meet the Annex A requirements for these species. We therefore consider that the requirements of Paragraph 7 a) and b) (and Annex A) are met for the species concerned. Ongoing assessments according to Paragraph 7 c) will be made during future surveillance audits.

In essence, Moody believes the requirements of all elements of Para 7 are fully met, and have been demonstrated, where relevant, through the high scores provided during the recent assessment.

Para 8: This information is noted.

Para 9: The relevant GOA Alaska pollock fishery is already certified. Potential IPI catches are noted in the relevant, retained species sections of the recent GOA assessment report. This IPI catch has no effect on the target stock(s) entering further Chain of Custody.

Para 10: The data required to satisfy Sections 10a and 10b are provided in Tables 3 and 4 of this letter. Moody Marine Ltd will provide an addendum to the GOA Alaska pollock Public Certification Report on receiving confirmation from the MSC that the IPI catch may carry the MSC eco-label.

Para 11: The certificate will be updated as required.

Para 12: This guidance is noted and will be addressed as stated in reference to Para. 6.

Para 13: This requirement for the annual surveillance audits is noted.

We would therefore request approval to allow IPI catches to be included within the scope of this certificate, having met (or be willing to meet) the requirements of Paragraphs 6-13.

If I can be of any further assistance, please do not hesitate to contact me.

Yours sincerely



Dr Andrew Hough
For Moody Marine Ltd

Moody Marine Ltd
Merlin House
Stanier Way
Wyvern Business Park
Derby DE21 6BF
UK

Tel: +44 (0) 1332 544663
Fax: +44 (0) 1332 675020
Email: enquiries@moodymarine.com
Web Site: www.moodyint.com

Annex 1: E-mail correspondence between Moody Marine and the MSC concerning IPI stocks

From: Amanda Stern-Pirlot [<mailto:Amanda.Stern-Pirlot@msc.org>]
Sent: Wednesday, September 01, 2010 9:14 AM
To: Andrew Hough; Jim Gilmore; Paul Knapman; Rob Blyth-Skyrme; Harmon, Christine
Cc: Richard Draves; John Van Amerongen; Pat Shanahan; stephanie madsen; Edward J. Richardson
Subject: RE: fish meal and oil--inseparable stocks

Dear All,
Andy, to answer your question: Yes, those stocks certified and able to be sold as such under the extension of scope mechanisms would not need to be counted as IPI. However, I recommend, for the sake of tidiness, that you move to finish sorting that out before applying for the exemption in D-30. Happy to help as needed.
Cheers,
Amanda

<.>>< ><(((-> <.>>>< <.>>><

Amanda Stern-Pirlot
Acting Governance Director

Marine Stewardship Council

Mountbarrow House | 6-20 Elizabeth Street | London | SW1W 9RB | United Kingdom
Direct: + 44 (0) 20 7811 3327 | Office: + 44 (0) 20 7811 3300 | Fax: + 44 (0) 20 7811 3301 | <http://www.msc.org/>

From: Andrew Hough [<mailto:a.hough@moodyint.com>]
Sent: 01 September 2010 14:08
To: Jim Gilmore; 'Paul Knapman'; 'Rob Blyth-Skyrme'; Amanda Stern-Pirlot; 'Harmon, Christine'
Cc: 'Richard Draves'; 'John Van Amerongen'; 'Pat Shanahan'; 'stephanie madsen'; 'Edward J. Richardson'
Subject: Re: fish meal and oil--inseparable stocks

Dear Jim, colleagues

I assume that you would prefer to apply for an exemption (to Paragraphs 6-14) on the basis that total IPI catches (multi species) comprise <2% of total catch - so avoiding the requirement to certify these on expiry of current certificate?

Amanda - I assume that cod and flatfish, allowed to be marketed as MSC certified in the pollock fishery under the 'extension to scope' exercise (P1 spp in other fishery) would be exempt from this IPI analysis?

In this case, we would require:

- a) information on those species/stocks you wish to be considered as IPI
- b) We would need a statement as to why these are Practicably Inseperable - the processing methods used
- c) Information on extent of catches, the specific stock status (as far as is known) and any analysis of the risk posed by the by-catch to the stocks affected. (Note that species may not have been specifically considered in the re-assessment as they would not necessarily comprise 'main' spp as defined in FAM v2).

Moody Marine Ltd
Merlin House
Stanier Way
Wyvern Business Park
Derby DE21 6BF
UK

Tel: +44 (0) 1332 544663
Fax: +44 (0) 1332 675020
Email: enquiries@moodymarine.com
Web Site: www.moodyint.com



We are happy to discuss, of course.

Best regards

Andy

Moody Marine Ltd
Merlin House
Stanier Way
Wyvern Business Park
Derby DE21 6BF
UK

Tel: +44 (0) 1332 544663
Fax: +44 (0) 1332 675020
Email: enquiries@moodymarine.com
Web Site: www.moodyint.com



Annex 2: MOA between APA and AFSF

Moody Marine Ltd
Merlin House
Stanier Way
Wyvern Business Park
Derby DE21 6BF
UK

Tel: +44 (0) 1332 544663
Fax: +44 (0) 1332 675020
Email: enquiries@moodymarine.com
Web Site: www.moodyint.com

Memorandum of Agreement

**At-sea Processors Association
And the
Alaska Fisheries Development Foundation**

This document serves as a Memorandum of Agreement (MOA) between the At-sea Processors Association (APA) and the Alaska Fisheries Development Foundation (AFDF) to permit participants in the Marine Stewardship Council (MSC) Alaska pollock and Pacific cod certifications to market incidental harvests of Alaska pollock in the Pacific cod fishery and incidental harvests of Pacific cod in the pollock fishery as eligible to carry the MSC logo, subject to participants complying with relevant chain of custody and other requirements of the MSC program.

This MOA is developed pursuant to guidance received from the MSC and the MSC-accredited certification body, Moody Marine, that incidental harvests of one MSC certified species taken in another MSC certified fishery can be marketed as eligible to carry the MSC logo. Under the MSC program, however, the designated client for a fishery controls the list of eligible participants in a certification. As such, APA and AFDF must submit an authorization to the appropriate certification body, in this case Moody Marine, for that body to include the names of all eligible program participants on the relevant certificates.

In this matter, APA is acting as the designated client for the Bering Sea/Aleutian Islands (BSAI) and Gulf of Alaska (GOA) Alaska pollock certifications. Once this MOA is signed by both fishery clients, APA will direct Moody Marine to include on the BSAI and GOA Alaska pollock certificates all participants in the BSAI and GOA Pacific cod certifications. AFDF, acting as the designated client for the BSAI and GOA Pacific cod certifications, will similarly direct Moody Marine to add all participants listed on the Alaska pollock certificates to the BSAI and GOA Pacific cod certificates.

Each party to this agreement shall retain a unilateral option to withdraw from this MOA and/or from its participation in the MSC certification program. If either party elects to exercise one or both of such withdrawal options, it shall provide written notice to the other party 180 days prior to the effective date of such withdrawal. Once such an option is exercised, this MOA shall become null and void and neither party will have any continuing obligations hereunder.

Each party to this MOA shall be responsible for paying all costs associated with the ongoing maintenance of its respective certification under the MSC program.

Moody Marine Ltd
Merlin House
Stanier Way
ern Business Park
Derby DE21 6BF
UK

Tel: +44 (0) 1332 544663
Fax: +44 (0) 1332 675020
Email: enquiries@moodymarine.com
Web Site: www.moodyint.com

The representatives of APA and AFDF listed below are authorized to enter into this agreement which becomes effective immediately upon both parties signing the MOA.

Stephanie D. Madsen

Stephanie Madsen
Executive Director
At-sea Processors Association

James Browning

James Browning
Executive Director
Alaska Fisheries Development Foundation

Dated: June 9, 2010

cc: Moody Marine Ltd.
Marine Stewardship Council
Surefish



Annex 3: MOA between APA and the Best Use Coalition

Moody Marine Ltd
Merlin House
Stanier Way
Wyvern Business Park
Derby DE21 6BF
UK

Tel: +44 (0) 1332 544663
Fax: +44 (0) 1332 675020
Email: enquiries@moodymarine.com
Web Site: www.moodyint.com

Memorandum of Agreement

Between the At-sea Processors Association and the Best Use Cooperative

This document serves as a Memorandum of Agreement (MOA) between the At-sea Processors Association (APA) and the Best Use Coalition (BUC) to permit participants in the Marine Stewardship Council (MSC) Alaska pollock and Alaska flatfish certifications to market harvests of Alaska pollock in the flatfish certifications and incidental and directed harvests of flatfish by participants in the Alaska pollock certifications as eligible to carry the MSC logo, subject to participants complying with chain of custody and other relevant MSC program requirements.

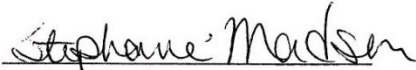
This MOA is developed pursuant to guidance received from the MSC and the MSC-accredited certification body, Moody Marine Ltd., that incidental harvests of one MSC certified species taken in another MSC certified fishery can be marketed as eligible to carry the MSC logo. In the matter of any flatfish taken in a directed fishery by a participant in the Alaska pollock fishery, the MSC program grants the fishery client the right—and, in fact, encourages client fisheries—to permit participation by others in the fishery. This MOA authorizes the appropriate certification body (or bodies), which is currently Moody Marine Ltd., to include the names of all eligible program participants on the relevant certificates.

In this matter, APA is acting as the designated client for the Bering Sea/Aleutian Islands (BSAI) and Gulf of Alaska (GOA) Alaska pollock certifications. Once this MOA is signed by both fishery clients, APA will direct Moody Marine Ltd. to include on the BSAI and GOA pollock certificates all participants in the BSAI and GOA flatfish certifications. BUC, acting as the client for the BSAI and GOA flatfish certifications, will similarly direct Moody Marine Ltd. to add all participants on the BSAI and GOA pollock certificates to the BSAI and GOA flatfish certificates.

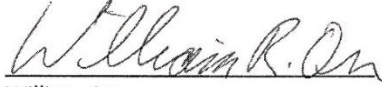
Each party to this agreement shall retain a unilateral option to withdraw from this MOA and/or from participation in the MSC certification program. If either party elects to exercise one or both withdrawal options, it shall provide written notice to the other party 180 days prior to the effective date of such withdrawal. Once such an option is exercised, this MOA shall become null and void and neither party will have any continuing obligations hereunder.

Each party to this MOA shall be responsible for paying all costs associated with the ongoing maintenance of its respective certification under the MSC program.

The representatives of APA and BUC listed below are authorized to enter into this agreement, which becomes effective immediately upon both parties signing the MOA.



Stephanie Madsen
Executive Director
At-sea Processors Association



William Orr
President
Best Use Coalition

Dated: July 1, 2010

cc: Moody Marine Ltd.
Marine Stewardship Council
Surefish