

~~RE~~ *Attn: Bill Stoltze*
10/30/07

**The Commercial Alaska Salmon Fisheries
Managed by the Alaska Department of Fish and Game
A 5-Year Re-Assessment Based on the
Marine Stewardship Council Program**

Contract Number: IHP-05-069

Version: SCS_Final Draft Assessment Report for Posting

Date: 30 October 2007

Client: Alaska Department of Fish and Game (ADF&G)

MSC reference standards:

MSC Accreditation Manual Issue 4,

MSC Fisheries Certification Methodology (FCM) Version 5,

MSC TAB Directives (All)

MSC Chain of Custody Certification Methodology (CoC CM) Version 6.

Accredited Certification Body:

Scientific Certification Systems, Inc.

Marine Fisheries Conservation Program

2200 Powell Street, Suite 725

Emeryville, CA 94608, United States

Assessment Team

Dr. Chet Chaffee, Project Manager, SCS

Dr. Greg Ruggeron (Natural Resources Consultants, Seattle, Washington, USA)

Mr. Ray Beamesderfer (Cramer Fish Sciences, Gresham, Oregon, USA)

Dr. Louis W. Botsford (University of California, Davis, California, USA)

*This is the body
that confirms the
sustainability of
Alaska salmon
w/o their stamp
of approval, Alaska
salmon cannot be
sold as sustainable
which is key to
marketing in Europe
and other markets...*

8.1.8 Upper Cook Inlet Gillnet

All five species of Pacific salmon are subject to commercial harvest in upper Cook Inlet set net and drift net fisheries (Fox and Shields 2005). Sockeye are the primary target species. Recent 10-year harvests have averaged 3.1 million sockeye, 221,000 coho, 194,000 pink, 168,000 chum, and 15,700 chinook (Fox 2005). Chinook, sockeye, and coho are also subject to significant sport and personal use fisheries (Pappas and Marsh 2004).

Management of directed sockeye fisheries is based on production from the five largest sockeye salmon producing drainages (Kenai, Kasilof, Susitna, and Crescent rivers and Fish Creek) (ADFG 2005). Chinook return to a number of large rivers and streams with the largest runs into the Kenai, Deshka, and Kasilof rivers (ADFG 2005). Coho are found in approximately 1,100 streams and rivers in UCI (Lafferty et al. 2005). Chum return to rivers and streams throughout the inlet. Pink salmon return in even years to rivers and streams throughout the Inlet. Escapement goals have been identified for 8 sockeye, 21 chinook, 3 coho, 1 chum, and 0 pink stocks (Hasbrouck and Edmundson 2005).

Commercial fisheries are regulated in two districts and 8 subdistricts encompassing about 3,400 square miles (Fox and Shields 2005). A series of species and area management plans provide detailed guidance on goals, allocations, and fishery implementation in upper Cook Inlet. Enhancement activities include limited releases of sockeye in the Kenai River, chinook in the Kasilof River and Ship Creek, and coho in Ship Creek (Eggertsen-Goff 2004, White 2005). Enhancement of Kasilof and Fish Creek sockeye has been discontinued.

Summary Assessment

The upper Cook Inlet commercial fishery passes Principle I criteria based on a weighted average score exceeding 80. However, scores for several specific indicators fell between 60 and 80.

Upper Cook Inlet	Criteria @ 100							Criteria @ 80							Criteria @ 60					Score	Weight	
	1	2	3	4	5	6	7	1	2	3	4	5	6	7	8	1	2	3	4			5
PRINCIPLE 1 - Fishery Management for Target Populations																						
Criterion 1.1 - Maintain high productivity of target population & associated ecological community																						
Subcriterion 1.1.1 - Stock units																						0.8
Indicator 1.1.1.1 Stock management units defined	1	0.5						1	1									1	1		95	0.4
Indicator 1.1.1.2 Scientific agreement on units	1	0.5	na					1	1									1	1		95	0.317
Indicator 1.1.1.3 Geographic distribution known								1	0.5	na								1	1		75	0.194
Indicator 1.1.1.4 Indicator Stocks	0.5	1	0.5	0.5				1	1									1	1		93	0.108
Indicator 1.1.1.5 Enhanced Stocks		0.5	1					1	1									1	1		93	0.064
Subcriterion 1.1.2 - Monitoring and assessment																						0.317
Indicator 1.1.2.1 Reliable estimates of renewals	0.5	1	1	1				1	1	1	1							1	1	1	98	0.4
Indicator 1.1.2.2 Reliable estimates of escapement								0.5	na	1	1							1	1	1	77	0.274
Indicator 1.1.2.3 Information on fish age and size	0.5							1	1									1	1		90	0.369
Indicator 1.1.2.4 Productivity estimates	0.5	0.5						1	na	na								1	1		90	0.112
Subcriterion 1.1.3 - Management goals																						0.246
Indicator 1.1.3.1 Limit reference points								1	1									1	1		80	0.2
Indicator 1.1.3.2 Target reference points	1	0.5	0.5					1	1									1	1	1	93	0.667
Criterion 1.2 - Fishery allows for the recovery of depleted stocks (Target Stocks)																						0.333
Indicator 1.2.1 Well-defined and effective strategy																		1	1		60	0.136
Indicator 1.2.2 Stocks not depleted and harvest rates are sustainable																		1	1		60	0.5
Criterion 1.3 - Fishing does not impair reproductive capacity																						0.5
Indicator 1.3.1 Age, sex and genetic structure are monitored								0.5	0.5	1								1	1	1	74	0.07

1.1 Productivity / 1.1.1 Stock Units.

1.1.1.1: Stock units defined. - There is a description of each stock unit, including: its geographic location, run timing, details on all the component stocks, and rationale for its definition. The rationale for sockeye and chinook stock units is generally clear with regard to conservation, fisheries management and stock assessment requirements. Coho, pink, and chum stock units combine component stocks for management purposes. The conservation and stock assessment rationale for this aggregate species approach is sometimes unclear. These species are generally harvested at a significantly lower rate than sockeye and chinook.

1.1.1.2: Scientific agreement on units. - Review of stock units has been primarily limited to within the management system. The stock units have been reviewed and found to be scientifically defensible by ADFG. The degree of review by other management authorities such as NMFS and the USFW is unclear although we are not aware of any significant objections from those quarters. A focused review of stock units by regional fisheries scientists outside the management system might not produce a consensus on aggregate stock units for coho, pink, and chum, particularly in the face of evidence for significant genetic differences among many populations (Seeb et al. 2000, Spearman 2000). There are no non-target species of salmon in upper Cook Inlet by our working definition as species that are actively avoided by management.

1.1.1.3: Geographic distribution known. - Harvest of Upper Cook Inlet salmon occurs within a known geographic range which is primarily upper Cook Inlet with limited interception of some species in Peninsula and Kodiak fisheries. Current information appears generally adequate to ensure that escapement goals for all stocks are met in most but not all years. In-season assessments of stock composition in mixed stock commercial fisheries of Cook Inlet are generally based on assumed time and area patterns inferred from post-season analysis of scale patterns for sockeye and historical tag recovery data for selected chinook and coho populations. In-river escapement estimates also provide some indication of relative run size and stock contribution. Time and area patterns may or may not be accurate in any given year. Previous attempts to infer sockeye stock composition in-season from scale patterns have been discontinued. Questions have been raised within the management system regarding the accuracy of historical stock composition data and an extensive sockeye GSI program is being implemented in 2006 for the Upper Cook Inlet commercial fisheries. The lack of accurate in-season information on sockeye stock composition can confound attempts to manage mixed stock commercial sockeye fisheries for stock-specific escapement goals, particularly in years of disparate returns of different stocks.

In-season information is not available on chinook and or stock composition although stock structure of Chinook in particular is less complex than that of sockeye during periods of intensive commercial salmon fisheries. ADFG believes that the need for improved stock composition data for Chinook salmon is minor in comparison with sockeye. UCI chinook salmon stocks are well known based on geographic and temporal proximity of fishing to spawning aggregates. The early run stocks (Susitna, early-run Kenai and a few relatively smaller stocks e.g. Anchor, Kasilof) have not been subjected to significant commercial fishing since the 1970s when the early run period was closed by regulation in face of low Chinook runs. Because of the lack of early run sockeye, ADFG notes that the early run period commercial fisheries have and will likely continue to be restricted for allocative reasons. The Kenai stock is the primary late-run stock and the UCI fishery management plan has many provisions to protect this stock, and expressly limits the interceptions of late run Kenai Chinook in face of strong Kenai late run

sockeye returns. There have been numerous radio telemetry studies of the Kenai (to verify sonar counts, etc), and the components of the early and late run Kenai Chinook are well known. However, significant questions remain regarding the status of late run Chinook in the Kasilof River and ADFG has initiated an assessment of that stock. With the advent in recent years of intensive fisheries for large returns of Kasilof sockeye, the relative contribution of late run Kasilof and Kenai Chinook stocks in Kasilof area fisheries has come into question. The fishery did not meet the 80 scoring guidepost for monitoring of the geographic range of all target stocks during the fishing season sufficient to prevent over harvest. Significant questions are remain for sockeye and to a lesser extent Kasilof Chinook.

Condition 35. Complete evaluations of sockeye and assess Kasilof chinook stock composition in fisheries to ensure accuracy of post-season analyses and clarify effectiveness of in-season time and area management. [Upper Cook Inlet]

1.1.1.4: Indicator stocks. - The status of the indicator stocks is somewhat but not entirely correlated with the stocks that are most at risk from a conservation point of view. The stocks used have been reviewed by ADFG although it is unclear how much outside review has been made. Formal analyses of the relationships between stocks and stocks of interest are not assessed every three to five years for all species. Management decisions in Upper Cook Inlet are heavily influenced by a subset of stocks, particularly the large productive Kenai and Kasilof sockeye runs. It is unclear to what degree current indicator stocks are representative of other unrepresented stocks for all species. Some information is available on the relationships among stocks of sockeye and chinook. Information is lacking on how representative the index stocks are of the larger groups of stocks in the region for coho, pink, and chum although fishery risks are somewhat ameliorated by reduced fishery interest in those species.

1.1.1.5: Enhanced stocks. - Enhancement activities are limited in upper Cook Inlet relative to Southeast Alaska and Prince William Sound. The scale of salmon enhancement of Upper Cook Inlet stocks is minor particularly since the elimination of the Tustumena Lake (Kasilof) sockeye program, which produced the majority of enhanced returns to UCI. Small Chinook and coho enhancement projects directed primarily at providing additional sport harvest opportunities for urban anglers while deflecting fishing effort from small wild stocks. Contribution estimates of UCI hatchery coho projects to commercial and sport harvests and stocked stream escapements during 1999-2001 have been evaluated by Bosch and Evans (2006). Sockeye salmon enhancement in UCI is now limited to fry plants into Hidden Lake (Kenai) and Big Lake (Fish Creek). Simpson and Edmundson (1999) have evaluated potential impacts of the Hidden Lake program. Litchfield and Willette (2002) provide a technical review of Fish Creek sockeye production. All enhancement programs are reviewed annually by ADF&G through the hatchery annual management plan process for the respective facilities, and must comply with department policies, including the genetics policy. The Cook Inlet Regional Salmon Enhancement Plan is currently being updated to provide direction for future salmon enhancement throughout the Cook Inlet area. Fisheries harvest both enhanced and wild (un-enhanced) stocks at the same time but harvest guidelines are generally based on the goals and objectives established for the wild (un-enhanced) stocks. No obvious hatchery problems have been reported. Given the limited scale of hatchery releases in this area, data and analyses appear to be adequate for evaluating the effects of enhanced fish in the management units on the wild (un-enhanced) fish stocks. Mark and recovery programs are operated for specific systems where enhanced: wild interactions are a potential concern.

1.1 Productivity / 1.1.2 Monitoring and Assessment.

1.1.2.1: Reliable estimates of removals. – Accurate and timely catch estimates are available for commercial fisheries based on daily in-season reporting. Catch estimates of sport and personal use fisheries that also affect escapement rely on in-season indices and post season estimates. Salmon are not released or discarded by the commercial fishery. Significant harvests of upper Cook Inlet salmon do not occur outside U.S. waters. Catch estimates are available for enhanced (e.g., hatchery) fish.

1.1.2.2: Reliable estimates of escapement. – Estimates are available for the annual escapement of most significant sockeye and chinook stocks harvested in the fishery. However, the reliability of sockeye sonar escapement estimates, particularly in the Susitna, has been called into question and is subject to an evaluation by the management system. Chinook escapement data is lacking for the Kasilof. In-season escapement data is collected for key sockeye and chinook stocks and used to regulate the fishery. Escapement estimates, particularly fishery independent in-season estimators, are lacking or limited for other species including coho, pink and chum although these species are not currently subject to intensive target fisheries. Estimates are available for the annual escapement and natural spawning of enhanced (e.g., hatchery) sockeye in the Kenai but not the Kasilof although the latter program has been discontinued. The fishery did not meet the 80 scoring guidepost for estimates of annual escapement of each target stock harvested in the fishery. New Susitna sockeye and Kasilof Chinook escapement assessment programs are in the process of being implemented.

Condition 36. Develop appropriately reliable estimates or indices of escapement for Susitna sockeye and Kasilof Chinook and incorporate into fishery management practices. [Upper Cook Inlet]

1.1.2.3: Information on age and size. - Annual monitoring programs collect data on the age and size of the catch and escapement for some but not all species and stocks. Extensive age, size, and length (ASL) data is collected from the commercial fishery catch. Annual ASL data is also collected from the escapement of most key sockeye and chinook stocks. This data used to reconstruct stock-recruitment relationships and to forecast future run sizes. Periodic monitoring programs have collected ASL data from the escapement of additional stocks although the scientific basis for sampling frequency of non-driver stocks is unclear.

1.1.2.4: Productivity estimates. – Scientifically defensible productivity estimates have been derived for some but not all target stocks. Stock-recruitment data based on run reconstructions is adequate to identify biological or sustainable escapement goals for most sockeye and chinook stocks. However, information is incomplete or lacking on the productivity of some key stocks including Susitna sockeye, Kasilof chinook, and coho. Risk assessments have considered uncertainty in productivity but formal assessments have concentrated on key fishery stocks. For instance, management considerations in recent years have included a substantial focus on productivity concerns associated with exceeding the upper end of Kenai and Kasilof sockeye escapement goals.

1.1 Productivity / 1.1.3 Management Goals.


1.1.3.1: Limit Reference Points. – For the purposes of this evaluation, sustainable and biological escapement goals (SEGs and BEGs) established for indicator stocks are treated as the operational equivalent of limit reference points. These goals are defined in Alaska's policy for the management of sustainable salmon fisheries (5 AAC 39.222). LRP's are defined as a state of the fishery that is not considered desirable where management action should severely curtail or stop

the fishery if it is reached. The LRP definition would appear to more closely fit the sustainable escapement threshold definition in Alaska's Sustainable Salmon Policy but no technical basis for establishing an SET has been established by ADFG and no SETs have been adopted. ADFG has recently defined a sustainable escapement goal threshold (SEGT) which is analogous to the lower end of an SEG range rather than an SET. The lack of SETs has been driven by the lack of an empirical basis for application of this theoretical concept as well as a belief system within the management agency that conservation risks of overfishing are practically nil for salmon stocks where the habitat is intact. Conditioned on this operational definition, there is some scientific basis for the LRP's for target stocks, these LRP's are defined to protect the stocks harvested by the fisheries, and there is no significant scientific disagreement regarding the LRP's used by the management system to formulate management decision for the fishery. Use of this operational definition will have implications for interpretation of other indicators that reference the LRP.

1.1.3.2: Target Reference Points. – Escapement goal ranges (SEGs and BEGs) established for indicator stocks clearly fit the definition of a Target Reference Point (TRP) as the desirable fishery level that management action should aim at maintaining. Escapement goals provide TRP's for the dominant fishery stocks and a subset of the other stocks in upper Cook Inlet. These goals have undergone extensive review and found to be scientifically defensible by ADFG. The extent of review and agreement among regional fisheries scientist outside the management system is unclear.

1.2 Recovery of Depleted Stocks

1.2.1: Recovery strategy and plan. – Under the operational definition of an LRP used in the evaluation; this evaluation identified depleted stocks based on a consistent failure to meet the lower end of the prescribed escapement goal range. This is equivalent to the definition of a “stock of concern” in Alaska's sustainable fisheries policy (SSFP) where yield, management, or conservation concerns are identified based on a chronic inability to meet escapement thresholds over a four to five year period. The SSP defines a “depleted salmon stock” based on identification of a conservation concern which is a chronic inability, despite the use of specific management measures, to maintain escapements for a stock above a sustained escapement threshold (SET). However, SETs have not been established for any Alaska stock and so conservation concerns have never been formally recognized by the management system. Lacking definition of specific SETs, application of sustainability criterion relative to LRPs and identification of depleted stocks was based on designated SEGs and BEGs.

No stocks of concern have been formally designated by the board of Fisheries for Upper Cook Inlet. Fish Creek sockeye were previously designated as a species of management concern but this designation has been removed based on new information and the response to management actions. However, Yentna sockeye met our operational definition of a depleted stock based on failure to meet escapement goals in 4 of last 5 years. Failure to meet the minimum escapement goal for this stock is particularly concerning because goals have been reduced on two previous occasions. 

According to ADFG, escapement goals and stock status of Cook Inlet sockeye stocks were reviewed during the 2004 Board of Fisheries cycle. At that time, the Yentna stock had not met the Sustainable Escapement Goal for the stock for 3 of the previous 5 years. It was not considered by ADF&G or the BOF as a SOC. The escapement goal for the Yentna was again not reached in 2005. An agenda change request for designation of Yentna sockeye as a stock of concern was rejected by the BOF at its fall work session. Comments submitted to the BOF on the ACR stated that ADF&G did not believe the sustainability of this stock, as defined by the SSFP

is jeopardized despite failure to reach escapement goals. ADF&G has expressed concerns with regard to Susitna River sockeye (for which the Yentna has served as an index). Time and area management actions were taken in Northern and Central Districts to limit harvest of Susitna sockeye based on low in-season returns in 2005. ADF&G has also implemented major stock assessment research including a genetic stock identification program that will provide information of where, when and in what numbers Susitna sockeye (and other Cook Inlet stocks) are harvested in Upper Cook Inlet, and a large mark-recapture program to estimate escapement to the Susitna River.

Our qualitative assessment of the management response to stock depletion suggests that planned time and area restrictions under existing management plans adopted by the Board of Fisheries and intensive stock assessments that have been implemented, provide a reasonable expectation for significant improvements in Yentna sockeye escapements within the scale and time period prescribed at the 60 scoring guidepost. However, recovery plans do not rise to the standard of the 80 scoring guidepost due to the lack of a formal stock of concern designation contrary to the SSFP definition based on chronic inability to meet escapement thresholds over a four or five year period, lack of a written action or recovery plan, absence of specific targets consistent with recovery within 3 reproductive cycles, and absence of specific fishery closure triggers consistent with the intent of a true limit reference point.

Yentna sockeye have failed to meet minimum escapement goals in 4 of the last 5 years and are a depleted stock based on our operational definition of limit reference points. ADF&G reviews stock status relative to identification of stocks of concern for consideration by the Board of Fisheries. Final content of action plans is determined in an open public process by ADF&G and the Board. However, the BOF did not elect to designate Yentna sockeye as a stock of concern at the 2005 meeting. The management response to depletion of Yentna sockeye does not meet the requirements of the 80 scoring guidepost with respect development and implementation of a specific plan for recovery within 3 reproductive cycles and or limitations of the fishery which allow the stock to recover to more than 150% of the LRP for abundance before any fisheries are permitted that target these stocks.

Condition 37. Review stock status of Susitna sockeye and develop an action plan intended to ensure achievement of Susitna sockeye escapement goals. Action plan should provide specific goals and an anticipated timeline for achieving the goals (see condition under Principle 3 for Indicator 3.4.1.2 [Upper Cook Inlet])

1.2.2: Stocks not depleted. - There is general agreement among regional fisheries scientist inside the management system that the methods of estimating escapements and exploitation rates for the majority of target stocks are scientifically defensible. Management actions have reduced fishing as the target stocks approach the LRP (i.e. escapement goals) and fisheries have only resulted in escapements that approach or are below the LRP escapement goal in no more than two years in a period of the most recent 5 consecutive years, for the majority of the target stocks. This fishery fails the 80 scoring guidepost for this indicator which is based on any rather than most target stocks. Yentna sockeye have failed to reach escapement goals in 4 of 5 recent years and significant questions exist regarding the accuracy of methods for estimating escapement and exploitation rates of this stock. The fishery did not meet the 80 scoring guidepost for this indicator due to failure of Yentna sockeye to reach escapement goals in 4 of 5 recent years and significant questions exist regarding the accuracy of methods for estimating escapement and exploitation rates of this stock. ADF&G is improving its assessment program for Yentna/Susitna sockeye salmon, and is taking management actions to limit commercial harvests of these fish in

2006. Improved management tools and performance are expected from improved assessment programs.

Application of this criterion recognizes that salmon management agencies cannot ensure ALL target stock escapements will meet goals four out of every five consecutive years given the variable nature of salmon returns. For instance, short-term declines in productivity as a result of environmental conditions can result in escapement goals not being met even when a management agency has closed fisheries in response to low returns. This is not the case for Yentna sockeye. Significant sockeye fisheries have been prosecuted in Cook Inlet despite a chronic failure to meet the Yentna escapement goal. Continuing strong returns of other sockeye stocks in Cook Inlet and other portions of Alaska indicate favorable environmental conditions for ocean rearing and maturation. The fact that Yentna sockeye have apparently declined during a period of favorable ocean productivity could be indicative of changes in local productivity in the Susitna system, problems with the assessment methods, a fishery effect. Any of these causes could be construed as a basis for significant concern from the standpoint of stock sustainability.

Condition 38. Develop a method for specifically setting an LRP that is comparable to the SET (Sustainable Escapement Threshold) outlined in the Sustainable Escapement Goal Policy (see Condition under Principle 3, Indicator 3.1.1) [Upper Cook Inlet]

1.3 Reproductive capacity

1.3.1: Age, size, sex and genetic considerations. – Extensive information on biological characteristics such as the age, size, sex and component stocks provides a reasonable basis for detection of fishing threats to the reproductive capacity of the target stocks. The management system includes provisions to minimize any adverse impacts to the genetic structure of wild (un-enhanced) stocks that may be due to the enhancement of other stocks. The significance of these considerations is specifically identified in the SSFP. Fishery management plans include specific actions aimed at protecting diversity and reproductive capacity.

ADFG believes its existing management and assessment programs are adequate to assure the long-term biological characteristics and reproductive capacity of UCI salmon stocks. Important elements include distributing escapements temporally across runs through use of time and area fishery restrictions, establishing and managing for escapement goals, and extensive age, sex and size sampling of runs. ADFG is unaware of no demonstrated detrimental effects of selective fishing that have occurred in salmon populations managed to maintain escapements, including several sockeye stocks from different areas of Alaska that have been harvested extensively with size selective gillnets for over a century “without measurable effects”.

However, given the intensive nature of UCI fisheries, it is unclear whether management actions are adequate for the health of all target stocks relative to biological characteristics such as age, size, sex and genetic structure. Fishery assessments have considered potential selective fishery impacts on some species such as early run Kenai chinook which is primarily a sport fishery species. It is unclear whether similar assessments have been completed for other species and stocks, particularly in large systems like the Kenai, Susitna, and Kasilof where genetic data has identified significant genetic substock structure. The fishery did not completely meet the 80 scoring guidepost for this indicator with respect to the consistency of management actions with maintaining healthy biological characteristics such as age, size, sex, and genetic structure of all target stocks.

Harvest rates in many of these fisheries are high. High harvest rates have the potential for differential harvest of stock components. Genetic studies using ever-advancing techniques are

documenting high diversity among and within subcomponents of a stock. Salmon conservationists have increasingly recognized the close relationship between diversity and productivity. All of this adds up to a real, albeit theoretical risk that intensive fisheries could exert a directional selective pressure which, over a period of time, could alter the genetic composition and performance of a stock. Of particular concern to the reviewers has been a prevailing belief in the management system that fisheries cannot pose a significant risk to salmon sustainability where habitats are intact. Until this belief has been thoroughly vetted, documented, and published in the scientific literature, this review must continue to treat this view as an untested hypothesis. Further, precautionary management requires that the burden of proof fall on demonstration that selective fisheries do not jeopardize diversity.

Condition 39. Evaluate appropriate existing age-sex-size information to determine if fisheries are exerting significant selectivity; continue ASL sampling in fisheries and several spawning stocks to continue a database for long-term evaluation of potential fishery selectivity. [Upper Cook Inlet]

Norton Sound	80.56	82.12	92.73
Kodiak	82.48	82.12	92.73
Chignik	87.55	82.12	92.73
Peninsula	80.13	82.12	92.73

12 Requirements for Continued Certification

To be awarded an MSC certificate for a fishery, the applicants or client must agree in written contract to develop an action plan for meeting the required 'Conditions'; a plan that must provide specific information on what actions will be taken, who will take the actions, and when the actions will be completed. An Action Plan has been submitted by ADF&G and approved by SCS (see Appendix 6).

As the applicant, ADF&G must also provide proof to SCS that a written contract is in place that obligates ADF&G to be both financially and technically responsible for annual surveillance visits by an MSC accredited certification body. The contract must also specify that ADF&G will endeavor to meet all specific "Conditions" and that evidence of not meeting the "Conditions" specified in the original assessment report is cause for the revocation of the MSC certificate.

The MSC allows fishery clients to switch Certification Bodies from the original CB and its assessment team to one with little background in the fisheries that have been assessed, and with no requirement to use any of the original assessment team members to ensure consistency of quality with the original assessment and original Conditions. Stakeholders in this process have identified to SCS some concern that switching CBs may, at a minimum, provide the potential for unintentional gaps in performance against the original assessment team's intent in the Conditions placed on each fishery. To ensure this is not a problem, any future review of the Conditions in this report requires that the CB of record for all future surveillance audits contact the team leader and team members of the original assessment team and provide the opportunity for both to comment on the management of the fisheries, as well as the opportunity to review and comment on the level of performance identified by Moody Marine and ADF&G in answering each Condition.

The contract for future annual surveillance audits is in place prior to certification being awarded.

12.1.1 General Requirements for Continued Certification

Surveillance audits will be comprised in general of (1) checking on compliance with the agreed action plan for meeting pre-specified 'Conditions', and (2) sets of selected questions that allow the certifier to determine whether the fishery is being maintained at a level of performance similar to or better than the performance recognized during the initial assessment.

The general 'Conditions' set for the Alaska salmon fisheries are:

- ADF&G must recognize that MSC standards require regular monitoring inspections at least once a year, focusing on compliance with the 'Conditions' set forth in this report (as outlined below) and continued conformity with the standards of certification.
- ADF&G must agree by contract to be responsible financially and technically for compliance with required surveillance audits by an accredited MSC certification body, and a contract must be signed and verified by SCS prior to certification being awarded.
- ADF&G must recognize that MSC standards require a full re-evaluation for certification (as opposed to yearly monitoring for update purposes) every five years.
- Prior to receiving final certification, ADF&G shall develop an 'Action Plan for Meeting the Condition for Continued Certification' and have it approved by SCS.

12.1.2 Specific Requirements (Conditions) for Continued Certification

ADF&G must agree in a written contract with an accredited MSC certification body to meet the specific conditions as described in Section 8 of this report (within the agreed timelines that will be agreed in the ' Action Plan for Meeting the Condition for Continued Certification' to be approved by SCS).

An Action Plan has been submitted by ADF&G and reviewed by SCS. A contract for future surveillance audits has been signed between Alaska Department of Fish and Game and Moody Marine for surveillance audits beginning in 2008.

As stated above, the MSC allows fishery clients to switch Certification Bodies from the original CB and its assessment team to one with little background in the fisheries that have been assessed, and with no requirement to use any of the original assessment team members to ensure consistency of quality with the original assessment and original Conditions. Stakeholders in this process have identified to SCS some concern that switching CBs may, at a minimum, provide the potential for unintentional gaps in performance against the original assessment team's intent in the Conditions placed on each fishery. To ensure this is not a problem, any future review of the Conditions in this report requires that the CB of record for all future surveillance audits (Moody Marine) contact the team leader and team members of the original SCS assessment team and provide the opportunity for all to comment on the management of the fisheries, as well as on any information provided or summary reports on the level of performance identified by Moody Marine and ADF&G in answering each Condition.

13 MSC Logo Licensing Responsibilities

As the "applicant" for certification of the Alaska salmon fisheries, ADF&G is the only entity that has the right to apply for a license to use the MSC logo. It is also the case that ADF&G has the right to approve the use of the logo for others associated with the fishery at its discretion.