**Quotes Regarding the Sustainability of the U.S. Wild Alaska Pollock Fisheries**

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Management System

* The Bering Sea-Aleutian Islands fisheries for Alaska pollock are exceptionally well managed and are characterized by state-of-the-art stock assessments and harvest strategies. - *(MSC Public Certification Report for Alaska Pollock-Bering Sea-Aleutian Islands, MRAG Americas (2016))*
* The federal groundfish fishery is a well-managed fishery. The North Pacific Fishery Management Council’s (NPFMC) operating procedures and management processes are thorough and supported by national law. The decision-making process and the overall roles and responsibilities are transparent, and both long-term and short-term objectives for management of this fishery are evident. - *(MSC Bering Sea and Aleutian Islands and Gulf of Alaska Pollock Public Certification Report, MRAG Americas (2020))*
* The power of the harvest strategy to manage BSAI pollock harvests successfully in a variable environment was established during assessments in the mid-2000s, when 5 of the 7 year-classes from 1999-2006 were below average to poor and the other two year-classes in that period were barely average. The cause of below average to poor recruitments was documented to be in large part due to environmental conditions that began to reverse in the second half of the 2000s (Stabeno et al. 2013, Heintz et al. 2013, Siddon et al. 2013). Nevertheless, the harvest strategy successfully managed to reduce exploitation during this period such that the stock never reached a level where recruitment would likely be impaired due to limited spawning biomass. Thus, it performed in practice in a precautionary manner when challenged; under present conditions there is high confidence that the harvest strategy functions in a precautionary manner*. - (MSC Bering Sea and Aleutian Islands and Gulf of Alaska Pollock Public Certification Report, MRAG Americas (2020))*
* Full at-sea monitoring of the offshore fleet is conducted by the observer program and dockside monitoring. Hence the catch documentation is considered very reliable. Discards are managed and included in the reporting scheme for the fisheries. - *(MSC Bering Sea and Aleutian Islands and Gulf of Alaska Pollock Public Certification Report, MRAG Americas (2020))*
* Well-defined harvest control rules are in place that ensure exploitation rate reduction as necessary and expected to keep the stock fluctuating at or above a target level consistent with Bmsy most of the time. - *(MSC Bering Sea and Aleutian Islands and Gulf of Alaska Pollock Public Certification Report, MRAG Americas (2020))*
* Hence evidence is available and does indicate fairly strongly that not only is the quota setting process effective in setting harvest levels that should reduce exploitation, the fishery compliance with the management plan is high enough that the intended reductions are realized. - *(MSC Bering Sea and Aleutian Islands and Gulf of Alaska Pollock Public Certification Report, MRAG Americas (2020))*
* It is concluded that the management system incorporates or is subject by law to a transparent mechanism for the resolution of legal disputes that is appropriate to the context of the fishery and has been tested and proven to be effective. - *(MSC Bering Sea and Aleutian Islands and Gulf of Alaska Pollock Public Certification Report, MRAG Americas (2020))*
* The CDQ Program was created by the Council in 1992 to provide western Alaska communities an opportunity to participate in the BSAI fisheries that had been foreclosed to them because of the high capital investment needed to enter the fishery. The CDQ Program allocates a percentage of all Bering Sea and Aleutian Islands quotas for groundfish, prohibited species, halibut, and crab to eligible communities. The purpose of the CDQ Program is to (i) to provide eligible western Alaska villages with the opportunity to participate and invest in fisheries in the Bering Sea and Aleutian Islands Management Area; (ii) to support economic development in western Alaska; (iii) to alleviate poverty and provide economic and social benefits for residents of western Alaska; and (iv) to achieve sustainable and diversified local economies in western Alaska. There are approximately 65 communities within a fifty-mile radius of the BS coastline who participate in the program. - *(MSC Bering Sea and Aleutian Islands and Gulf of Alaska Pollock Public Certification Report, MRAG Americas (2020))*
* Therefore, it is concluded that the management system includes consultation processes that regularly seek and accept relevant information, including local knowledge. The management system demonstrates consideration of the information and explains how it is used or not used. - *(MSC Bering Sea and Aleutian Islands and Gulf of Alaska Pollock Public Certification Report, MRAG Americas (2020))*
* Therefore, it is concluded that the consultation process provides opportunity and encouragement for all interested and affected parties to be involved, and facilitates their effective engagement. *- (MSC Bering Sea and Aleutian Islands and Gulf of Alaska Pollock Public Certification Report, MRAG Americas (2020))*
* It is concluded that decision-making processes respond to serious and other important issues identified in relevant research, monitoring, evaluation and consultation, in a transparent, timely and adaptive manner and take account of the wider implications of decisions*. - (MSC Bering Sea and Aleutian Islands and Gulf of Alaska Pollock Public Certification Report, MRAG Americas (2020))*
* A manager needs to know how many fish are caught and, if any, how many are discarded (or thrown overboard). In this fishery there are two observers of catch and discards on board each large vessel, which means that fishing operations are watched around the clock. There is a close to 80% observer coverage of the catcher boat fleet*. - (Overfishing, What Everyone Needs to Know” Hilborn, Ray and Ulrike)*
* Ever since it became an American fishery through the 200-mile economic zone, there has been a total catch cap of 2 million metric tons for all species from the Eastern Bering Sea and Aleutian Islands. This has meant in most years, the actual allowed catch of each species has been less than what scientists said biologically acceptable*.” - (Overfishing, What Everyone Needs to Know” Hilborn, Ray and Ulrike)*
* The pollock fishery stands out because the data are excellent, the harvest control rules are conservative, and there is an ecosystem-wide cap on total catch. Few fisheries in the world have this level of observer coverage and frequency of surveys. The harvest control rule allows for a relatively small fraction of the total stock to be harvested. Finally, the ecosystem-wide maximum catch of 2 million tons provides some security that the entire ecosystem will not be nearly as heavily impacted as is common elsewhere*.” - (Overfishing, What Everyone Needs to Know” Hilborn, Ray and Ulrike)*
* U.S. wild-caught Alaska pollock is a smart seafood choice because it is sustainably managed and responsibly harvested under U.S. regulations. *- (NOAA FishWatch)*
* The Alaska Pollock fishery is a great example of how science-based management and monitoring can help ensure the long-term sustainability of the resource. - *(NOAA FIshWatch)*
* The Bering Sea fishery is one of the first U.S. fisheries to be managed with catch shares and is often considered one of the best-managed fisheries in the world. *- (NOAA FishWatch)*
* The Wild Alaska Pollock fishery has been a leader in sustainable fisheries management for decades. *- (MSC Ocean Champion Press Release 1/20/22)*
* The MSC US Ocean Champion Award is an annual award that was established in 2017 to reward fisheries and companies engaged in the MSC program who demonstrate continued leadership on sustainability. Wild Alaska Pollock is recognized not only for its results but the transparency provided by the industry: independent observers actively participate in the fishing process and publicly monitored flow scales are used to verify the accuracy of the harvests of Wild Alaska Pollock and the low amounts of incidental catches of other species. Observers also collect critical information that enables fishery scientists to ascertain the overall and ongoing health of the fishery.  *- (MSC Ocean Champion Press Release 1/20/21)*
* Where decades of precautionary, science-based limits have allowed Alaska to distinguish itself as a worldwide leader in responsible and sustainable fisheries management, Russian fisheries have suffered from boom and bust cycles due to overfishing and illegal fishing. Alaska has also established marine protection areas, bycatch mitigation plans, and 100% observer coverage on pollock vessels – additional measures that set the domestic Alaskan pollock industry apart. ­ *- (FishWise: “Alaskan Pollock: A Fish True to Its Name)*
* Ever enjoyed frozen fish sticks or a fast food fish fillet sandwich? You’ve likely eaten Alaska Pollock. Not only is this [U.S.] fishery one of the largest in the world, it is also considered one of the best managed fisheries. *- (Smithsonian: “Ocean, Find your Blue”)*
* The considerations above do not deny that some well-managed fisheries exist, notably in Alaska, USA, such as on Alaska pollock and salmon. These well-managed fisheries exist because the core underlying US legal instrument, the Magnuson-Stevens Fishery Conservation and Management Reauthorization Act, and Its execution are clear and harsh with regards to overfishing and legally binding actions. *- (“Viewpoint: Back to the Future for Fisheries, Where Will We Choose to Go?,” Dirk Zeller and Daniel Pauly, Cambridge University Press)*

Bycatch/Discards

* Primary and secondary species represent a small percentage of the removals from the pollock fishery. Relatively few seabirds and marine mammals are directly impacted by the fishery. Thus, the overall bycatch of the fishery is small and is highly unlikely to negatively impact individual species or broader ecosystem elements. Management measures are in place to support an overall strategy to limit negative effects of the fishery on primary, secondary, and ETP [Endangered, Threatened and Protected] species (including those considered prohibited species). Observer coverage is essentially 100% providing high quality quantitative information on removals. Regular sampling of habitat and ecosystem features coupled with ecosystem modelling provide a sound basis for evaluating fishery impacts*. - (MSC Bering Sea and Aleutian Islands and Gulf of Alaska Pollock Public Certification Report, MRAG Americas (2020))*
* There is no unwanted catch of pollock in the pollock fishery. All pollock is retained and landed. Discarding of pollock, juvenile or other, does not occur and if it does, it is reflected on e-reporting or observer reports*. - (MSC Bering Sea and Aleutian Islands and Gulf of Alaska Pollock Public Certification Report, MRAG Americas (2020))*
* The species composition and amount of retained species and bycatch in the pollock fishery under certification, including marine mammals and seabirds, is collected by the North Pacific Observer Program operated by NMFS. The pelagic trawl pollock fisheries in the BSAI had 100% observer coverage in 2018 with two observers per vessel (Alaska Fisheries Science Center and Alaska Regional Office 2019). *- (MSC Bering Sea and Aleutian Islands and Gulf of Alaska Pollock Public Certification Report, MRAG Americas (2020))*
* Since the pollock fishery is primarily pelagic in nature, the bycatch of non-target species is small (<2%). *- (MSC Bering Sea and Aleutian Islands and Gulf of Alaska Pollock Public Certification Report, MRAG Americas (2020))*
* Few seabirds are taken in the pelagic trawl fishery in the BSAI. *- (MSC Bering Sea and Aleutian Islands and Gulf of Alaska Pollock Public Certification Report, MRAG Americas (2020))*
* Given the small number of Chinook estimated to have been taken in the Pollock fishery, the BSAI pollock fishery is highly unlikely to pose a threat to ESA-listed salmon ESUs in the Pacific Northwest. *- (MSC Bering Sea and Aleutian Islands and Gulf of Alaska Pollock Public Certification Report, MRAG Americas (2020))*
* The recent bycatches of Chinook are well below the allowable limits established by Amendment 91 and the lower catch limit established in Amendment 110 of 45,000 fish (Balsiger 2018). *- (MSC Bering Sea and Aleutian Islands and Gulf of Alaska Pollock Public Certification Report, MRAG Americas (2020))*
* Estimates of Overfishing Levels and Acceptable Biological Catch levels are reviewed regularly, mostly annually. These measures are expected to maintain retained species at levels which are highly likely to be within biologically based limits*. - (MSC Bering Sea and Aleutian Islands and Gulf of Alaska Pollock Public Certification Report, MRAG Americas (2020))*
* The Observer Program verifies catch composition and quantity, including catch discarded at sea, and collects biological information on marine resources. Used in conjunction with reporting and weighing requirements, the information collected by observers or electronic monitoring systems provides the foundation for in-season management and for tracking species-specific catch and bycatch amounts. The UoAs [Unit of Assessment] review annually alternative measures to minimize unwanted catch of primary species. *- (MSC Bering Sea and Aleutian Islands and Gulf of Alaska Pollock Public Certification Report, MRAG Americas (2020))*
* The Council has adopted measures to minimize bycatch in groundfish fisheries, including pollock, in the BSAI and the GOA (NPFMC 2018, 2019). Observer Program data make it possible to enforce bycatch quotas for the non-groundfish species. There are regulations and measures to reduce and/or avoid seabird bycatch. The regulations cover recordkeeping and reporting requirements, gear limitation, and specifications of seabird-avoidance gear for vessels based on the season, gear, and the type of gear used. Requirements of vessels to report seabirds incidentally taken to the Observer Program are also outlined in the regulations*. - (MSC Bering Sea and Aleutian Islands and Gulf of Alaska Pollock Public Certification Report, MRAG Americas (2020))*
* Regularly updated stock assessments (NPFMC 2018), fishery catch records, and quantitative information on bycatch in the pollock fishery from the Observer Program are available on a mostly annual basis (AFSC 2018). Observer coverage is essentially 100%. Thus, accurate and verifiable information is available to assess the consequences of bycatch on main secondary species. *- (MSC Bering Sea and Aleutian Islands and Gulf of Alaska Pollock Public Certification Report, MRAG Americas (2020))*
* There is a strategy in place to manage the UoAs’ [Unit of Assessment] impacts on ETP [Endangered, Threatened or Protected] species. This strategy is designed to minimize ETP species mortality by the UoAs and is highly likely to achieve national and international requirements and to ensure the UoAs does not hinder recovery. The FMP outlines how it manages interactions with ETP species and works to limit such interactions, including measures that have established conservation zones and have implemented gear restrictions and time/area closures to reduce bycatch of ETP species. - *(MSC Bering Sea and Aleutian Islands and Gulf of Alaska Pollock Public Certification Report, MRAG Americas (2020))*
* The BSAI and GOA pollock fisheries do not interact with marine mammals, including northern fur seals and Steller sea lions, to a significant degree. *- (MSC Bering Sea and Aleutian Islands and Gulf of Alaska Pollock Public Certification Report, MRAG Americas (2020))*
* Quantitative information is routinely collected to estimate fishery-related mortality of all ETP [Endangered, Threatened or Protected] species. This information comes from annual or periodic stock assessments of marine mammals, seabirds, fish and crustaceans, take reduction team reports, and annual estimates of interactions derived from Observer Program data collected from the pollock fishery in the BSAI and the GOA. The catch data show that the UoAs’ [Unit of Assessment] impacts on these species are relatively low. The UoAs’ impact on the known ETP species is also relatively low. Mortalities of ETP seabirds is known to be within limits identified in recovery plans. Similarly, recorded mortalities of marine mammals are well below PBRs estimated in annual population assessments and conservation or recovery plans. Data indicate that few to no ESA-listed salmon are taken each year by the UoAs, and catches of PSC are within limits, with one exception – non-Chinook salmon in the BSAI fishery. Although the catch is large, there is no conservation concern. Therefore, along with independent estimates of population status, the Observer information is sufficient to quantitatively estimate outcome status with a high degree of certainly. *- (MSC Bering Sea and Aleutian Islands and Gulf of Alaska Pollock Public Certification Report, MRAG Americas (2020))*
* The Alaska Pollock fishery is one of the cleanest in terms of incidental catch of other species (less than 1 percent). - *(NOAA FishWatch)*
* Bycatch of Pacific salmon is a particular concern because of its importance to commercial and subsistence fisheries. The relative impact of the pollock fishery on critical salmon runs has been estimated to be relatively low, especially since 2007. *- (NOAA FishWatch)*
* The North Pacific Fishery Management Council implemented measures in 2011 to increase incentives for fishermen to further reduce Chinook salmon bycatch. The pollock industry has developed several innovative approaches to meet these new requirements, including using NOAA Fisheries Observer program data to close salmon bycatch hotspots to fishing on a weekly basis and testing a new salmon excluder device for trawl nets. The Council improved the management of Chinook and chum salmon bycatch avoidance program in 2016 and continues to examine additional measures to minimize salmon bycatch. *- (NOAA FishWatch)*

Climate Change

* Climate change is affecting the BSAI and GOA strongly, and there are well-documented impacts of the changing environmental conditions on pollock productivity parameters. This is a weakness because it means that the relatively strong historical data on stock productivity, distribution and timing of events in the annual cycle may be becoming increasingly unreliable as a basis for estimating population benchmarks for conservation and management. The current management approach appears to be sufficiently precautionary to allow for these climate change effects, as well as the other things that the precautionary approach was adopted to account for. *- (MSC Bering Sea and Aleutian Islands and Gulf of Alaska Pollock Public Certification Report, MRAG Americas (2020))*

Ecosystem Effects/Habitat

* NMFS and the Council recognize that habitat is essential for maintaining productivity of fishery resources. Because fishing gear has the potential to disturb habitat, regulations have been implemented to protect areas that could be irreversibly damaged by fishing. Large areas of the North Pacific have been permanently closed to groundfish trawling to reduce potential adverse impacts on sensitive habitat and to protect benthic invertebrates. *- (MSC Bering Sea and Aleutian Islands and Gulf of Alaska Pollock Public Certification Report, MRAG Americas (2020))*
* The most recent five-year review of Essential Fish Habitat (EFH), which took place in 2016, estimated that the average impact of the Pollock fishery on pollock EFH was 2.6% in the Bering Sea. This low level of disturbance is not regarded as a threat to essential fish habitat. *- (MSC Bering Sea and Aleutian Islands and Gulf of Alaska Pollock Public Certification Report, MRAG Americas (2020))*
* The following Habitat Areas of Particular Concern (HAPCs) have been designated in the BSAI management area: 1) Bowers Ridge Habitat Conservation Zone (Bowers Ridge and Ulm Plateau; bottom contact gear prohibited), 2) Alaska Seamount Habitat Protection Area (Bowers Seamount, mobile bottom contact gear prohibited), 3) skate egg concentration areas, and 4) four areas designated as the Aleutian Islands Coral Habitat Protection Areas where no contact with the bottom is permitted. *- (MSC Bering Sea and Aleutian Islands and Gulf of Alaska Pollock Public Certification Report, MRAG Americas (2020))*
* The pollock fishery is highly unlikely to reduce the structure and function of commonly encountered habitats to the point of serious or irreversible harm*. - (MSC Bering Sea and Aleutian Islands and Gulf of Alaska Pollock Public Certification Report, MRAG Americas (2020))*
* Given that only a small fraction of the Pollock fishery occurs in the Pribilof canyons, and that the spatial footprint of the fishery relative to the size of the Bering Sea is very limited, data indicate that it is highly unlikely that the Pollock fishery would reduce corals to the point of serious harm. - *(MSC Bering Sea and Aleutian Islands and Gulf of Alaska Pollock Public Certification Report, MRAG Americas (2020))*
* It is highly unlikely that the Pollock fishery would reduce sponges to the point of serious harm. *- (MSC Bering Sea and Aleutian Islands and Gulf of Alaska Pollock Public Certification Report, MRAG Americas (2020))*
* NMFS and the Council recognize that habitat is essential for maintaining productivity of fishery resources. Because fishing gear has the potential to disturb habitat, regulations have been implemented to protect areas that could be irreversibly damaged by fishing. Large areas of the North Pacific have been permanently closed to groundfish trawling to reduce potential adverse impacts on vulnerable habitat and to protect benthic invertebrates. Fishery closures established in nearshore areas to reduce interactions with Steller sea lions may also have ancillary benefits of reducing habitat impacts. *- (MSC Bering Sea and Aleutian Islands and Gulf of Alaska Pollock Public Certification Report, MRAG Americas (2020))*
* Research and management actions demonstrate that identifying EFH [Essential Fish Habitat] and HAPCs [Habitat Areas of Particular Concern] and implementing measures to protect them will succeed. The measures implemented to protect vulnerable habitats (e.g., closed areas for seamounts and corals; gear restrictions to minimize impacts; and research to improve knowledge) are likely to work and there is an objective basis for confidence that the Council’s strategy will work*. - (MSC Bering Sea and Aleutian Islands and Gulf of Alaska Pollock Public Certification Report, MRAG Americas (2020))*
* VMS [Vessel Monitoring System] data on the distribution of the fishery with respect to closed areas and HAPC along with Observer Program data provide clear quantitative evidence that the strategy for minimizing the effects of the fishery on habitat is being implemented successfully and is achieving its objective. *- (MSC Bering Sea and Aleutian Islands and Gulf of Alaska Pollock Public Certification Report, MRAG Americas (2020))*
* Based on the composition and small quantities of primary and secondary species caught, the limited interactions with ETP [Endangered, Threatened or Protected] species, and habitat (e.g., Simpson et al. 2017) and ecosystem analyses (e.g., Aydin et al. 2007), the fishery is highly unlikely to disrupt the key elements underlying ecosystem structure and function to a point where there would be serious or irreversible harm. Pollock is a key component of the BS and AI ecosystems. The long-term record of managing the fishery above the target reference point, and the small footprint of the fishery on the habitat, provides evidence that the fishery is highly unlikely to disrupt key elements of the underlying ecosystem structure and function to a point where there would be a serious or irreversible harm. - *(MSC Bering Sea and Aleutian Islands and Gulf of Alaska Pollock Public Certification Report, MRAG Americas (2020))*
* The FMP ecosystem objectives, actions of the Council’s Ecosystem Committee, and other ongoing initiatives, it can be said that there is a strategy in place that consists of plans for both BSAI and GOA that address the UoAs’ [Unit of Assessment] main impacts on the ecosystem and some of these measures are demonstrably in place. - *(MSC Bering Sea and Aleutian Islands and Gulf of Alaska Pollock Public Certification Report, MRAG Americas (2020))*
* Moreover, there is also a large-scale research program on the status of the ecosystem of the Eastern Bering Sea that are not commercially important with the goal of understanding the big picture of the ecosystem. *- (Overfishing, What Everyone Needs to Know,” Hilborn, Ray and Ulrike)*
* The Alaska Pollock fishery uses midwater trawl nets that, although sometimes making contact with the bottom, have minimal impact on habitat*. - (NOAA FishWatch)*

Status of the Stock/Stock Assessment

* Major strengths of the assessment is that multiple primary data sets are used in the assessment, so the outcomes are not determined by only a small number of indices. The data on catches and survey data are both collected with highly standardized and validated methods, so reliability is high, and magnitude of uncertainties are well quantified. The uncertainties are considered in the assessment models, and the assessment model itself is flexible, integrative of the available information, and well tested. In addition, the management benchmarks for biomass and fishing mortality are explicit, biologically based, and have been tested. *- (MSC Bering Sea and Aleutian Islands and Gulf of Alaska Pollock Public Certification Report, MRAG Americas (2020))*
* The general performance of the harvest is evaluated as part of the annual assessment process and in the consultations that follow the assessment. As an exceptionally high-profile fishery both ecologically and economically, the option to discuss the need for another independent review of the harvest strategy is always part of the consultations that follow the assessment. Concerns about P2 [MSC Principle 2] aspects of the harvest strategy (See P2 criteria in this document) are raised much more often than concerns about the harvest strategy to ensure the pollock stock itself is harvested sustainably, particular at a time of high stock abundance, and the overall catch cap for EBS is resulting in much less than the single-stock ABC being taken. *- (MSC Bering Sea and Aleutian Islands and Gulf of Alaska Pollock Public Certification Report, MRAG Americas (2020))*
* In the annual assessment process an elaborate set of performance criteria are used to guide final decisions about stock status, before the control rule is applied to the results…Hence the design of the harvest control rule does take account of a wide range of uncertainties *- (MSC Bering Sea and Aleutian Islands and Gulf of Alaska Pollock Public Certification Report, MRAG Americas (2020))*
* These models [for BS pollock] are considered state-of-the-art for stock assessment, and account for uncertainties in almost all input data series and model parameters or vectors estimated. They are being used internationally in a project to set, among other things, best practice guidance for stock assessment practices globally. *- (MSC Bering Sea and Aleutian Islands and Gulf of Alaska Pollock Public Certification Report, MRAG Americas (2020))*
* The assessments receive peer review at three levels. The first is internal, in that the NMFS Plan Team meets with the assessment staff before, during, and after the assessment is prepared. The first meeting is to scope the options and scenarios that should be explored in the annual assessment, based on the assessment of the previous year(s) and feedback about how the previous year’s fishery has unfolded. Meetings between the assessment staff and the Plan Team occur in a somewhat ad hoc manner during the development of the assessment, depending on what issues may arise during preparation of the assessment. As the assessment nears completion a meeting with the Plan Team is held to review results and presentation material, to be sure that the assessment is ready for presentation to the North Pacific Fisheries Management Council Scientific and Statistical Committee (NPFMC – SSC). In a narrow sense only the final meeting of the Plan Team and assessment staff might be considered “peer review” of the assessment, but in fact just as “assessment” is both a process and a product, in a slightly broader sense all the meetings between the Plan Team and the assessment staff can be considered part of an internal peer review process, since all of the meetings have the coverage and quality of the assessment as their primary concern. *- (MSC Bering Sea and Aleutian Islands and Gulf of Alaska Pollock Public Certification Report, MRAG Americas (2020))*
* The available pollock data are the envy of most fisheries managers because in order to manage a fishery well you want to know trends in abundance from scientifically designed surveys. For pollock there are two surveys a year. *- (Overfishing, What Everyone Needs to Know,” Hilborn, Ray and Ulrike)*

Traceability/Illegal Fishing

* All product is packed on board with harvest location and other traceability information recorded and displayed on labelling. Vessels are subject to 100% observer coverage at all times. *- (MSC Bering Sea and Aleutian Islands and Gulf of Alaska Pollock Public Certification Report, MRAG Americas (2020))*
* Traceability of product to the point of offload and sale is excellent. - *(MSC Bering Sea and Aleutian Islands and Gulf of Alaska Pollock Public Certification Report, MRAG Americas (2020))*
* As all landings must be recorded, observer coverage is high, and all licensed fishing vessels may participate in the fishery, the likelihood of vessels fishing outside the unit of certification or the opportunity for substitution of certified fish with non-certified fish is negligible. Risk of substitution in the fishery is very low given that vessels fish only in UoC [ Unit of Certification] where VMS [Vessel Monitoring System] and observer coverage is required. Risk of substitution at point of landing is controlled by the government required Product Transfer Report, which can be reconciled against the eLandings report described above. Risk of mixing at point of landing is controlled by the government-required product transfer report, which must be reconciled during CoC [Chain of Custody] audits given that CoC starts at the offload from the catcher-processor or mothership. At-sea processed product is frozen in boxes that are not opened at landing, and unprocessed onshore landings are sorted and recorded at processing facilities that require CoC [Chain of Custody]. *- (MSC Bering Sea and Aleutian Islands and Gulf of Alaska Pollock Public Certification Report, MRAG Americas (2020))*