



Ashish Salvi <ashish_salvi@omegafishmeal.com>

Way forward on multispecies groups in small pelagics FIP

Duncan Leadbitter <dleadbitter@fishmatter.com.au>
To: Ashish Salvi <ashish_salvi@omegafishmeal.com>

24 September 2025 at 14:51

Hi Ashish

Here is the email trail with Marin trust that is part of our 6 month report

Can you add please?

Thanks

Duncan

From: Robert Lefebure <rlfebure@marin-trust.com>
Sent: Wednesday, August 06, 2025 6:58 PM
To: Duncan <dleadbitter@fishmatter.com.au>; Nicola Clark <nclark@marin-trust.com>
Subject: RE: Way forward on multispecies groups in small pelagics FIP

Hi Duncan

Hope all good

Just a quick reply here. Like Nicola said, we are open to some options here from your side like you suggested in the original email.

For example, if you want to make a proposal to manage lesser sardine as a complex, that could be at genus level, which also recognizes that this is a complex with all these listed species in it, but for practical reasons they cannot be segregated on landing and the management authority cannot manage them individually. And solution X is how they have solved it, which is credible for these reasons...

We were thinking about the Ecuador case, as they use an indicator species approach. So different species, not one complex like lesser sardine, but still one species to rule them all. There are some others as well, like in Mexico, which manages thread herring at genus level I believe. I can have a more detailed look at that one.

Pass does not mean BMSY btw, its Blim. The only true hard fail that transcends CAT A,B,C is being below Blim. As long as it is on that line, you are fine.

But pass can also mean meeting Cat D, which is the PSA analysis (i.e. there is no management or information at all). All depends on the volumes in the annual catch composition, which I can also see you making an argument for to shuffle around a bit if needed. Not for the target species, but if some by-catch is completely un-managed and there are no catch limits set and annual volume is say 7% and not 5% of the total catch, CAT D is the only way to assess them still.

You must also have an idea here on what you think might work well for these lesser sardines. Want to have a call about it? Maybe easier?

All the best and hope all good

Robert

From: dleadbitter@fishmatter.com.au <dleadbitter@fishmatter.com.au>

Sent: 29 July 2025 23:44

To: Nicola Clark <nclark@marin-trust.com>

Subject: RE: Way forward on multispecies groups in small pelagics FIP

Hi Nicola

Thanks for this.

I guess the nub of the question is as you say 'all species must be listed in the report and all must pass'. So, pass means that they all have to be above their individual Bmsy.

In the Ecuador report some species are not individually listed (they are listed at the genus level) and its not known whether each individual species passes. So, its unclear how this unit of assessment has been approved.

The MT system doesn't work well at all in species rich ecosystems.

Not sure where to go from here to be honest.

Cheers

Duncan

From: Nicola Clark <nclark@marin-trust.com>

Sent: 25 July 2025 23:33

To: dleadbitter@fishmatter.com.au

Cc: 'Kamlesh Parab' <kamlesh_parab@omegafishmeal.com>; 'Antony Joseph' <antonyjoseph1958@gmail.com>; 'Quality Control' <qc@omegafishmeal.com>; 'Manoj Kushe' <manoj_kushe@omegafishmeal.com>; 'Amol Patil' <amolnpatil@gmail.com>; 'MANOJ KUSHE' <mkkushe@gmail.com>; 'Ashish Salvi' <ashish_salvi@omegafishmeal.com>; 'Badruddin' <badruddin@tjmarine.in>; 'Arun' <arun@tjmarine.in>

Subject: RE: Way forward on multispecies groups in small pelagics FIP

Hi Duncan,

Thanks again for your email and apologies for the delay in getting back to you.

Me and Robert have had a good discussion regarding this and your proposed plan to make the case for a defined group to be considered as one for management and approval purposes makes sense. The current MT assessment requires all species to be listed in the report and pass (differing from the IPI approach in the MSC), however, how the fishery manages the species complex is up to the management authority and we are happy to consider new methodologies as long as they have a sound rationale.

If needed we would also be open to adapting the assessment (or guidance) should there be a need based on the findings of the work, and if it is applicable in a broader context (i.e. we would not make changes based a single fishery however if it has broader implications for other fisheries then it would be worth exploring further). An example fishery that have utilised differing methodologies for species assessments under the current assessment approach would be Ecuador (you can find the documents and most recent assessment on the [FIP profile here](#)) and we would welcome other ideas as well.

We look forward to receiving any proposed methodologies and are happy to arrange a follow up call to discuss these in more detail.

Many thanks,

Nicola Clark

Impacts Manager

 Marine Ingredients Certifications Ltd (09357209) operates the MarinTrust Programme, the leading independent business to business certification programme for the marine ingredient value chain.

MarinTrust | Unit C, Printworks | 22 Amelia Street | London | SE17 3BZ | United Kingdom
T: +44 (0) 2039 780 819 | M: +44(0) 7538 653640 | nclark@marin-trust.com | www.marin-trust.com

Please consider the environment before printing this e-mail.

From: Nicola Clark

Sent: 08 July 2025 13:39

To: dleadbitter@fishmatter.com.au

Cc: 'Kamlesh Parab' <kamlesh_parab@omegafishmeal.com>; 'Antony Joseph' <antonyjoseph1958@gmail.com>; 'Quality Control' <qc@omegafishmeal.com>; 'Manoj Kushe' <manoj_kushe@omegafishmeal.com>; 'Amol Patil' <amolnpatil@gmail.com>; 'MANOJ KUSHE' <mkkushe@gmail.com>; 'Ashish Salvi' <ashish_salvi@omegafishmeal.com>; 'Badruddin' <badruddin@tjmarine.in>; 'Arun' <arun@tjmarine.in>

Subject: RE: Way forward on multispecies groups in small pelagics FIP

Dear Duncan,

Thank you for your email outlining this situation. I have forwarded this onto Robert to get his thoughts and I will follow up to discuss how we may proceed with this in the context of the fishery assessment requirements.

Kind regards,

Nicola Clark

Impacts Manager

 Marine Ingredients Certifications Ltd (09357209) operates the MarinTrust Programme, the leading independent business to business certification programme for the marine ingredient value chain.

MarinTrust | Unit C, Printworks | 22 Amelia Street | London | SE17 3BZ | United Kingdom
T: +44 (0) 2039 780 819 | M: +44(0) 7538 653640 | nclark@marin-trust.com | www.marin-trust.com

Please consider the environment before printing this e-mail.

From: dleadbitter@fishmatter.com.au <dleadbitter@fishmatter.com.au>

Sent: 27 June 2025 05:07

To: Nicola Clark <nclark@marin-trust.com>

Cc: 'Kamlesh Parab' <kamlesh_parab@omegafishmeal.com>; 'Antony Joseph' <antonyjoseph1958@gmail.com>; 'Quality Control' <qc@omegafishmeal.com>; 'Manoj Kushe' <manoj_kushe@omegafishmeal.com>; 'Amol Patil' <amolnpatil@gmail.com>; 'MANOJ KUSHE' <mkkushe@gmail.com>; 'Ashish Salvi' <ashish_salvi@omegafishmeal.com>; 'Badruddin'

<badruddin@tjmarine.in>; 'Arun' <arun@tjmarine.in>

Subject: Way forward on multispecies groups in small pelagics FIP

Dear Nicola

As part of our FAP for the recently approved extension of our FIP covering small pelagics (IOS, IM) in Maharashtra and Goa we have an action item to seek guidance from Marin Trust on a way forward on species complexes. In our case the circumstance relates to the lesser sardines – a group of sardine species which are common throughout India but the relative abundance varies from place to place and from year to year. As part of our first fishery assessment in 2018 it was found that this group was dominated by the fimbriated sardine (*Sardinella fimbriata*) but having collected further information and workshopped the question with senior scientists (attached) we now know that this group as a whole may vary enormously from year to year (thus triggering MT requirements in one year but not the next) and, within the group, any individual species may be responsible for the annual change.

There are identification issues for such species, which is why they are commonly lumped together as 'lesser sardines'. In the MSC system species which are similar are termed IPI (Indistinguishable or Practically Indistinguishable). In some Marin Trust fisheries there are species groups approved (e.g. thread herrings and bullet tunas). However, there is no guidance on how to handle such species.

This issue is of growing importance for several reasons. The MT system is focused on encouraging good fisheries management and, as you know, our FIP has a clear objective of seeking fishery management plans for small pelagic fisheries in the states of Goa and Maharashtra. Having workable management rules is important and seeking to manage every individual species at its own MSY is unworkable. At the practical level of evaluating landings and then inputs to a fishmeal factory the challenges of separating species make for significant difficulties.

Having discussed this issue with scientists in India (but not to the extent of having reached any conclusions) the challenges of trying to manage all the lesser sardines individually is generally agreed. The government monitoring program recognises this in that species are lumped. Its true that that multispecies stock assessments are not yet produced but this is possible and could be an outcome driven by the proposed fishery management plans.

There are a number of ways of dealing with this type of situation. Setting strict cutoffs will always be problematic. One way forward that would seem to fit the MT model would be for the applicant FIP to make the case to MT for a defined group to be considered as one for management and approval purposes. We would be happy to put some ideas to you that may be helpful. There is some urgency in this in that the scientific arm of government is committed to producing scientific advice to governments on fisheries management in October of this year. Whilst its true that scientific advice is one thing and a final sign-off is another the FIP is in a great position to advance good fisheries management by making well thought through recommendations that make sense from both a fisheries management perspective and an industry perspective.

Marin Trusts engagement and guidance on this issue is sought.

Kind regards

Duncan

