**Recommendation from the Mark Committee Work Group**

**on the Marking Variance Form**

**Work Group Task:** Review and possibly clarify the language describing when the RCMT “Request for Marking Variances” form is required.

**Background:** A decision to change the RCMT *Mass Marking* form to a *Request for Marking Variance* form was agreed to at the 2001 Mark Meeting.For the past several Mark Meetings the issue of Variance Requests is one of the last items on the agenda. We generally receive a few official requests or announcements for the use of agency wire or the use of an adipose clip. This item often raises the question about what type of marking or/tagging requires this Request, but a clear and comprehensive definition seems to be lacking. The RCMT Agreements on marking and tagging clearly state that this Variance form is required for use of blank or agency-only wire, but does not specifically address ad-marking of chum & sockeye:

[Section III.3](https://www.rmpc.org/wp-content/uploads/2022/09/2011_Regional_Agreements.pdf):

*Blank wire or agency only tag use requires a proposal (Request for a Marking Variance) to the Mark Committee. The proposal will be reviewed for its impact on the regional CWT recovery programs.*

At the 2022 meeting Ron Olson volunteered to look at editing the language in our Regional Agreements to clarify when a Variance Request is required. A workgroup was formed with the following volunteers: Ron Olson, Jim Longwill, Dion Oxman, Eric Keller, Jillian Cady, and Kathy Fraser.

In reviewing the Minutes from the past 21 mark meetings (2001-2022), Variance Requests were submitted, or announced, for all years except for the 2017-2019 years. These requests included the following types of marking:

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| **Type of Mark included in the Variance Requests** | **Approx. # of Requests** | **Notes on past and current usage** |
| Agency or blank wire | 21+ | Still common; although expected to decline as price difference with CWT is negligible |
| Body tagging | 2 | Some body tagging occurring, with most fish also receiving a snout tag or other tag |
| Adipose clips on Chinook, Coho or Steelhead: | 3 | IDFG & USFWS Mass Marking on Snake River Spring Chinook until 2004, then sent to PSC SFEC  w/other adipose Mass Marking programs |
| Adipose clips on Chum or Sockeye | 9 | CDFO |
| Non-adipose clips on CWT Chinook | 2 | CDFW |

Miscellaneous Historical Notes Considered in Developing the Recommendation:

* The number of requests is approximate because the process is rather informal. Some requests are sent in before the meeting and some are just announced at the meeting. Additionally, these requests have not been actively solicited, it has just been a standing agenda item.
* All of the documented requests were approved by the Mark Committee.
* There were no requests received for the 2017-2019 meeting. However, this doesn’t mean than no agency/blank wire tagging is occurring as some programs are not reported and some requests were approved for multiple years.
* There used to be large programs in the Columbia Basin for blank wire tagging of Chinook by ODFW (i.e. Umatilla, McKenzie, and Young’s Bay) and WDFW (Upriver Brights). ODFW switched to CWT wire in 2011. WDFW no longer use any agency-only wire.
* CDFW announced the possible MM of Chinook (i.e. 2009 for Feather R. Hatchery), and stated that they were told to send requests to this forum. CDFW is not a party of the PSC Treaty. They have also announced non adipose-clip CWT projects for Coho restoration (2013).
* NMT stopped selling blank wire in 2005. Beginning in 2023 agency-only wire is now sold as the same price as standard CWT wire.

**Recommendation:**

1. RCMT Meeting Agenda Item
   1. Keep the standing agenda item ‘Special Marking Requests & Announcements’
2. Proposed Edits to RCMT Language on the use of the Marking Variance form

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| --- | --- |
| **Document** | **Current Language & Proposed Edits in Track Changes and Italicized** |
| *[Request for Marking Variance](https://www.rmpc.org/request_for_marking_variances-2022september/)* [(v. 2022)](https://www.rmpc.org/request_for_marking_variances-2022september/) | Please provide the following information when requesting marking variances from the standard tagging and marking established in the "Regional Coordination and Agreements on Marking and Tagging Pacific Coast Salmonids." *This is primarily intended for proposals for non-snout CWT tagging, including agency-only wire, blank wire, or body tagging with wire. This form is intended to be used to report on tagging that would impact other agencies’ CWT sampling program. This form is not to be used for fish that have a CWT snout tag along with another wire tag.* |
| Section III.3 of the [2011 Regional Coordination and Agreements on Marking and Tagging Pacific Coast Salmonids](https://www.rmpc.org/wp-content/uploads/2022/09/2011_Regional_Agreements.pdf) | Page 6:  3. Use of Blank Wire and Agency Only Wire  Blank wire or agency only tag use requires a proposal (Request for a Marking Variance) to the RCMT. The proposal will be reviewed for its impact on the regional CWT recovery programs.  Page 6 & 7:  IV. Current Status of Non-CWT Related Marking  1. No Regional Recovery Effort  Recovery agencies no longer sample the ocean fisheries for fin marks other than the adipose clip. As a result, single and multiple fin marks are primarily used for stock identification in terminal fisheries, on the spawning grounds, and at the hatchery.  2. Duplication of Marks Possible  Duplication of fin marks (single or multiple) for a given species is acceptable since there is no regional fin mark recovery effort. However, all marks must be coordinated with other potentially impacted agencies to ensure the integrity of their respective marking programs.  3. Coordination of New Mark Requests  Agency fin mark coordinators are no longer required to submit fin mark requests to the RCMT. However, mark coordinators still have the responsibility to work with other agencies *in their region* to ensure the integrity of all fin marking programs*, and to announce any major changes in their marking or tag recovery programs that would affect other parties.* |
| Request Marking Variance [Webpage](https://www.rmpc.org/coordination/request-variance/) | Form to be completed when requesting marking variances from the standard tagging and marking established in the "Regional Coordination and Agreements on Marking and Tagging Pacific Coast Salmonids." *This is primarily intended for proposals for non-snout CWT tagging, including agency-only wire, blank wire, or body tagging with wire. This form is intended to be used to report on tagging that would impact other agencies’ CWT sampling program. This form is not to be used for fish that have a CWT snout tag along with another wire tag.* (2022 webpage text version). |

**Possible discussion questions for the Workgroup**:

1. Is there any need for future Variance Requests for anything other than agency-only wire and body tagging, i.e. eliminate any requests involving adipose fin clipping? We could continue to ask for announcements of new marking programs of interest to the group.
2. Are ad-clip requests resulting from the table in our Regional Agreements: *Required Use of the Adipose Fin Clip with a CWT* ?
3. What about California’s requests for MMing or CWTs w/out ad clipping? They are part of the PSC process..
4. What is the future for body tagging or other marks that could interfere with electronic tag detection?
5. Are there any other marks that we need to consider?
6. How can we clarity the language requiring Variance Requests?
7. Should we change the name from *Requests for Marking Variances* to *Requests for Using non-CWT wire or agency-only wire?*
8. Is it beneficial to continue the use of the agenda item title: S***pecial Marking Requests & Announcements?***
9. If agency-only wire is now the same price as CWT wire, is this process even necessary anymore?