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MRAG Americas, Inc.

Kamchatka Russia Fisheries

MSC Variation Request

Table 1 – Variation request

1	Date submitted to the MSC
	- Please note the MSC will usually respond within 14 days, but for complex variations, longer may be necessary. The MSC will keep you informed if it will take longer than 14 days.
	06 July 2022 (revised 12 July 2022)
2	CAB
	MRAG Americas, Inc.
3	Fishery name and certificate number
	Multiple – see Table 3
4	Lead auditor or program manager
	Amanda Stern-Pirlot
5	Request prepared by
	Michealene Corlett
6	Scheme requirement(s) for which variation requested
	7.28.2 - <i>Surveillance audits shall take place according to the default surveillance level described in Table 5</i> G7.28.2 – Surveillance levels table 7.16.1 - <i>The team shall carry out the site visit as planned.</i>

	<i>G7.16 - The full assessment team should attend all the meetings at the site visit. Where this could cause unreasonable cost or inconvenience, and where the assessment would not be adversely affected by some team members participating remotely, the CAB may submit a variation request</i>
7	How many times has a variation for this requirement been accepted for the same assessment of the same fishery?
	Zero

Table 2 – Variation justification

1	Proposed variation	
	Per the original surveillance schedules for our various Kamchatka Russia fisheries, the surveillance audit and reassessment site visits are to be on-site with the full assessment team in attendance. MRAG Americas proposes to deviate from the original surveillance audit schedule to have one local auditor onsite while being supported remotely by the two remaining assessment team members.	
2	Additional time requested	
	Original deadline date	NA
	Modified deadline date requested	NA
	Length of additional time requested	NA
3	Justification	
	MRAG Americas has a number of fisheries in Kamchatka Russia that are due for surveillance audits or reassessment this summer, all of which were scheduled to have the entire assessment team onsite. Due to the current state of affairs, the United States Department of State has issued a 'Level 4: Do Not Travel' to Russia warning. https://travel.state.gov/content/travel/en/traveladvisories/traveladvisories/russia-travel-advisory.html it is impossible for the entire assessment team to travel to Kamchatka. In order to keep the fisheries certified and in the MSC program while ensuring a quality assessment, we propose a hybrid site visit with one local auditor onsite while being supported remotely by the remaining assessment team members.	
4	Implications for assessment	
	There are no negative implications for the assessment of these fisheries if a hybrid site visit is conducted. See Table 4: Risk matrix.	
5	Mitigation of the implications for assessment	
	NA	
6	How many conditions does the fishery have and will their progress be affected (positive or negative)?	
	See Table 3	
7	What is the status of the current assessment or audit?	
	The team is preparing for announcement of the various fisheries surveillance audits and reassessments. See Table 3	

8	Further comments
	Considering the current state of affairs, we feel this is a safe and reasonable solution which allows for a quality assessment despite any restrictions in place.
9	If applicable, additional information added after the MSC's request

Table 3. List of fisheries, certificate numbers and assessment

Fishery Name	Certificate Number	Assessment status	Conditions – Note: Progress on conditions will not be affected
Zarya-Kolpakovsky Sobolevo West Kamchatka salmon	MSC-F-31480	2 nd surveillance audit	5 open conditions
Tymlat Karaginsky Bay salmon	MSC-F-30023	3 rd surveillance audit	5 open conditions
Vostochny Bereg-Maksimovsky, Koryakmoreprodukt-Nachikinskoe & Severo-Vostochnaya Company Karaginsky Bay salmon	MSC-F-31483	2 nd surveillance audit	5 open conditions
Kolkhoz im. Bekereva-Ukinskiy Liman & Belorechensk-Vyvenskoe Karaginsky Bay salmon	MSC-F-31482	2 nd surveillance audit	6 open conditions
Kamchatka River salmon	MSC-F-31370	4 th surveillance audit and 1 st reassessment	4 open conditions
Narody Seveera Bolsheretsk salmon	MSC-F-31368	4 th surveillance audit and 1 st reassessment	4 open conditions
Ozernovsky RKZ No 55 West Kamchatka salmon	MSC-F-31477	2 nd surveillance audit	2 open conditions
Olyutorskiy Bay salmon	MSC-F-31369	4 th surveillance audit and 1 st reassessment	1 open condition
VA-Delta Kamchatka salmon	MSC-F-31265	1 st surveillance audit	1 open condition
Vityaz-Avto Danish seine walleye pollock	MSC-F-31503	1 st surveillance audit	5 open conditions

Table 4. Risk matrix

Risk areas	Key risks	Ability to verify remotely
Sufficient information to enable an effective and robust fishery assessment process and comprehensive assessment against the MSC Fisheries Standard	Ability to verify information remotely	Fishery reports, government documents, stock assessment reports and other relevant reports can be easily and transparently checked remotely due to such information being widely distributed and made publicly available to several stakeholders. These reports can be transmitted electronically, and veracity easily confirmed. Additionally, one assessor is local and is able to access any websites that may be blocked to users outside of Russia.
	Ability to engage with stakeholders, deliver a robust stakeholder	In addition to one assessor being onsite, there are ample opportunities and mechanisms to

	consultation process and conduct interviews with stakeholders.	engage with stakeholders including electronic forms of communication, such as videoconferencing, phone conferencing, email and phone. These mechanisms are effective in the particular circumstances of the fishery.
	Ability to gather information and carry out stakeholder consultations if the Risk Based Framework is being used to assess data-deficient PIs. Of the fisheries in this list, the RBF was applied at initial assessment only to the VA pollock fishery for one P2 PI.	Fishery reports, government documents, stock assessment reports and other relevant reports can be easily and transparently checked remotely due to such information being widely distributed and made publicly available to several stakeholders. These reports can be transmitted electronically, and veracity easily confirmed allowing assessors to determine the appropriate RBF methodology to use in the assessment. In addition to one assessor being onsite, there are ample opportunities and mechanisms to engage with stakeholders including electronic forms of communication, such as videoconferencing, phone conferencing, email and phone. These mechanisms are effective in the particular circumstances of the fishery. MRAG Americas was able to successfully carry out an RBF assessment for a very similar fishery in 2020.
	Availability of information	Fishery reports, government documents, stock assessment reports and other relevant reports that can be used to assess performance against the MSC Fisheries Standard are easily and transparently checked remotely, due to such information being available publicly, on websites or are widely distributed and made publicly available to several stakeholders. The reports can be transmitted electronically, and veracity easily confirmed. Additionally, one assessor is local and is able to access any websites that may be blocked to users outside of Russia.
	Ability to understand the context, scale, and intensity of the fishery operations.	Verification mechanisms such as information from electronic monitoring of position, observer data, logbooks, fisher interviews, dockside monitoring are available to be transmitted electronically to auditors in a form that can be easily interpreted. Two members

		of the assessment team have worked on the listed fisheries previously and are very familiar with this context.
Sufficient communication capability to effectively plan, conduct interviews and facility information sharing as per IAF ID 4:2018.	Competency of assessment teams, auditees, and stakeholders in using ICT.	A 'Remote Assessment Form' is sent to all audit participants of a planned remote assessment to facilitate planning and to verify the competency of attendees' ability in using all available ICT. The assessment team is able to use multiple forms of communication to accommodate clients, fishery scientists, managers and interested stakeholders. All team members have experience with remote auditing.
	Ability to clearly exchange information between the assessment team, prospective fishery client and stakeholders and to be understood by all parties when parties speak different languages.	A 'Remote Assessment Form' is sent to all audit participants of a planned remote assessment to determine if a translator will be used. The form also denotes that the official language of the MSC is English. The on-site assessment team member speaks both Russian and English, as does the client representative. Electronic files can be translated using Google Translate if needed.
	Ability to schedule remote site visit activities at reasonable mutually convenient times when parties are located across different time zones.	A 'Remote Assessment Form' is sent to all audit participants of a planned remote assessment to verify the respective time zones of each participant. This will aid in planning a mutually convenient time for audit attendees. In this particular instance, attendees are local and there will be very little time difference, if any, from their respective locations. Time differences between audit attendees and remote assessment team members are manageable and understood.
Risk areas		Ability to verify remotely
Client and stakeholder input		There are ample opportunities and mechanisms to engage with clients and stakeholders including electronic forms of communication, such as videoconferencing, phone conferencing, email and phone. These mechanisms are effective in the particular circumstances of the fishery. Additionally, one assessment team member will be available onsite.
Fishery reports, government documents, stock assessment reports and/or other relevant reports		Fishery reports and other documented evidence that can be used to assess performance against the MSC Fisheries Standard are easily and transparently checked remotely, due to such information being available publicly, on websites or are widely distributed and made publicly available to several stakeholders. The reports can be transmitted electronically, and veracity easily confirmed. Additionally, one assessor is local and is able to access any websites that may be blocked to users outside of Russia.

Information appropriate to determination of Principle 1 and Principle 2 information requirements	Information from electronic monitoring of position, observer data, logbooks, fisher interviews, dockside monitoring etc. is required to verify performance against the MSC Fisheries standard, is available to be transmitted electronically to auditors in a form that can be easily interpreted. Additionally, one assessment team member will be onsite to verify as needed.
Transparency of the management system	While the transparency of the management system could be improved, the assessment team has experience working with and obtaining the necessary and relevant information from KamchatNIRO, VNIRO, and the fisheries enforcement agency in order to successfully conduct the assessment.
Vessels, gear or other physical aspects of the fishery	The assessment does not require investigation of the physical aspects of the fishery.