



Dear Sam Dignan

Sent by email

Date: 02/03/2020

**Subject: Request for variation to the MSC Certification Process Requirement (v2.1) FCP-7.8.1.1 and FCP-7.16 for ISF Iceland lumpfish.**

Dear Sam,

I write with reference to your submission on 19/02/2020 of a request for variation from clause FCP-7.16 ("Part A" - to allow remote participation for site visit of P1 team member) and clause FCP-7.8.1.1 ("Part B" - to allow an product eligibility date earlier than the date of Public Comment Draft Report) for the ISF Iceland Lumpfish fishery certification process.

As you are aware, the CR procedures relating to these clauses are integral to ensuring all MSC accredited Conformity Assessment Bodies operate in a consistent and transparent manner. The MSC intends that these requirements be met across all fisheries and CoC certificate holders, except in exceptional, well-justified circumstances, as part of the MSC programme.

MSC notes the factors presented in your letter supporting your request. These factors are summarized against two relevant clauses below:

**FCP-7.16 (Part A)**

- The team will be in attendance in person during the site visit;
- The P1 assessment team member will be available for the site visit remotely; including for any remote stakeholder meetings;
- All of the P1 information is public can be accessed remotely (e.g. online);
- This proposal would represent a cost saving for the client.

**FCP-7.8.1.1 (Part B)**

- The fishery is highly seasonal (March to July). A eligibility date linked to this period would allow the client to sell product from this season (2020);
- The elibility date proposal is contingent on new bycatch related legislation to be fully implemented (this legislation was developed in response to the fishery's certification being suspended previously). This proposal would mitigate product being sold under a different management regime which is subject to current assessment. If the fishery is not ultimately certified, then no product can be sold as MSC-certified.
- Systems to handle traceability risks (e.g. date-based product segregation) if the eligibility date were to be mid-season are in place. All client group members are MSC Chain of Custody (CoC) certified.



Given the rationale provided, the MSC is willing to grant a variation to the CR in this case subject to the following conditions:

- Stakeholders are informed of the exact eligibility date once determined.
- Stakeholders are informed of the P1 team member "remote" availability prior to the site visit.

If you have any questions regarding this response, please do not hesitate to contact the Fisheries Assessment Manager for this fishery either by email or phone.

Best regards,

Marine Stewardship Council

CC: Accreditation Services International, Lead Auditor