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**Sent by email**

Date: 07/12/2018

**Subject: Request for variation to the MSC Certification Requirement v2.0 FCR-PE2.2.2 for VA-Delta Kamchatka salmon fisheries**

Dear Amanda Stern-Pirlot,

I write with reference to your submission on 04/12/2018 of a request for variation to the MSC Certification Requirement (CR) to allow:

To hold an off-site audit for the Pymta River scope extension to the VA-Delta salmon assessment.

As you are aware, the CR procedures relating to v2.0 FCR-PE2.2.2 state:

The CAB shall conduct the expedited assessment either during a special on-site expedited audit or during a regular on-site surveillance audit

These 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 supporting your request, including:**

- Vityza-Avto and Delta Co have joined with two new client fisheries who wish to add Pymta River salmon stocks to the VA-Delta MSC certified fishery.
- This river is directly between the certified VA-Delta and Narody-Severa Bolsheresk fisheries, and as with all of the Pacific Salmon fisheries, is only conducted in the summer (beginning mid-June).
- The Pymta River is an indicator river for KamchatNIRO and as such is heavily monitored for escapements and other indicators of stock health.
- The scope extension is expected only to cover P1 for the four targeted salmon species, as P2 and 3 are already covered (same gears, habitats, management system as the other certified rivers in W. Kamchatka).
- The assessment team for this fishery is very familiar with Kamchatka salmon fisheries information and management, having assessed and certified several. Information on this river and fishery is readily available remotely, and as the fishery is closed in winter, having an on-site visit would only add considerable time and expense to the assessment, and would take place in Petropavlovsk in a meeting room because there would be no fishery to visit.
- A remote audit would be conducted via teleconference with the clients, relevant authorities, and any interested stakeholders in late January. The assessment team would then visit the fishery in the summer of 2019 when it's open, and when the team is anyway going to visit other W. Kamchatka fisheries as part of the 2019 surveillance audit.
- The scope extension could begin right away, and with a remote audit in January, has a high likelihood of being completed before the 2019 fishing season.
- Allowing a remote audit would save the prospective clients a lot of money, and would also be environmentally responsible, as the assessment team would not have to travel from Portland, OR and St Petersburg RU for meetings which can just as effectively be held by telephone.
- As the actual fisheries will be visited in summer of 2019 when they are open (combined with surveillance



audits for other W. Kamchatka fisheries), there is no risk that information on the actual operations of the fishery will be overlooked. Note this risk is also even lower because the assessment team has visited these fisheries a number of times already under the existing W. Kamchatka certifications.

**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 changes to the process and are invited to engage in the off-site audit.

If you have any questions regarding this response, please do not hesitate to contact the relevant Fisheries Assessment Manager for this fishery.

Marine Stewardship Council

cc: Accreditation Services International