

Marine Stewardship Council - Variation Request

Date submitted to MSC	October 17, 2017
Name of CAB	SCS Global Services
Fishery Name/CoC Certificate Number	US Atlantic Surfclam and Ocean Quahog
Lead Auditor/Programme Manager	Joe DeAlteris/Sian Morgan
Scheme requirement(s) for which variation requested	FCRV2.0 7.23.3.1 & 7.23.11.1
Is this variation sought in order to fulfil IPI requirements (FCR 7.4.14)?	No

1. Proposed variation

SCS proposes a variation to the combined requirements of 7.23.3.1 and 7.23.11.1, where an on-site “audit involves face to face engagement with the client” and in the initial certification cycle 2 or more auditors shall be appointed to conduct the ‘surveillance audit,’ based on the understanding that the MSC intends for CABs to interpret these requirements such that the on-site meeting must involve face to face engagement by both auditors in order for it to be considered that the “surveillance audit” has been conducted by 2 auditors.

SCS is proposing an audit plan for a level 6 surveillance audit that features face to face engagement by both auditors with key stakeholders, where the auditors conduct the face to face meetings in separate locations. SCS considers that this audit plan meets the MSC intent that both auditors have face-to-face engagement, and notes that there is nothing in the wording that stipulates that all activities must be conducted by both auditors. SCS considers that this audit plan provides cost and time efficiency without sacrificing effectiveness. If both auditors met in a single location then they may meet with some key management staff via teleconference, which would result in overall less face-to-face engagement.

2. Rationale/Justification

At this first annual surveillance the two-person assessment team will be assessing progress on conditions pertaining to two different principles (one condition on Principle 3 and the remaining on Principle 2). The assessment team has determined that the assessment of progress on conditions is best achieved through meetings with management agency staff. However, the management agency staff best suited to speak to progress on conditions are located in two different locations (one location for the Principle 3 condition and another for Principle 2 conditions). Significant information on general updates to the fishery per 7.23.12.4 are available online. Rather than impose significant additional professional fees and travel expense to the client by having both auditors travel to multiple locations for a surveillance audit, the assessment team and CAB propose to have the two assessment team members visit two separate locations for the surveillance audit.

Dr. Joe DeAlteris proposes to meet with Mid-Atlantic Fishery Management Council (MAFMC) staff and the client representative in the Mid-Atlantic while Mr. Richard Allen proposes to meet with NOAA Office of Law Enforcement Staff and management staff at the Greater Atlantic Regional Fisheries Office in the Northeast. All meetings would take place within the same week.

3. Implications for assessment (required for fisheries assessment variations only)	
None.	
4. Have the stakeholders of this fishery assessment been informed of this request? (required for fisheries assessment variations only)	<i>Stakeholders would be informed via the Surveillance Audit Announcement</i>
5. Further Comments	

