

Control Union (UK) Limited

UK Fisheries/DFFU/Doggerbank Group saithe fishery

MSC Variation Request

Marine Stewardship Council variation request

Table 1 – Variation request

1	Date submitted to MSC
	01/06/2021
2	CAB
	Control Union (UK) Limited
3	Fishery name and certificate number
	UK Fisheries/DFFU/Doggerbank Group saithe (MSC-F-31235; MSC-F-31236)
4	Lead auditor or program manager
	Henry Ernst
5	Request prepared by
	Henry Ernst
6	Scheme requirement(s) for which variation requested
	GCR 2.4.1. – 7.5.6 – The CAB shall issue fishery certificates with a maximum validity period of 5 years from the issue date.
7	How many times has a variation for this requirement been accepted for the same assessment of the same fishery?
	None, this is the first VR on GCR 2.4.1 for this assessment.

Table 2 – Variation justification

1	Proposed variation	
	The CAB is requesting a 60 day extension from the certificate anniversary in order to maintain certificate continuity for the client, allowing them to draft action plans for newly raised harmonised conditions.	
2	Additional time requested	
	Original deadline date	14/10/2021
	Modified deadline date requested	13/12/2021
	Length of additional time requested	60 days
3	Justification	
	<p>Due to the outcome of Brexit and the ensuing geopolitical changes in fisheries management in the Greater North Sea. Several conditions have been raised in the Client and Peer Review Draft Report (CPRDR) to address these changes. The information base on which the conditions were raised became publically available during the remote audit meetings, and as such, was taken into account in the CPRDR. These conditions have been raised in harmonisation with other North Sea fisheries currently undergoing assessment (the main one being the Joint Demersal Fisheries). Given the extended harmonisation discussions, the requirement to include this new information into the assessment (this fishery is the “first” chronologically to include current Brexit impacts on fisheries management in its scoring), and the internal review of the CPRDR, assessment timelines have been significantly compressed. Further, as mentioned above, given that this fishery is chronologically the first to score the impacts of Brexit on the North Sea saithe stock (and on various elements of P3), it is likely that the Peer Review, and later stakeholder comments will be significant.</p> <p>A 60 day extension to the certificate would allow the maintenance of certification while permitting the following: (1) the clients to draft Client Action Plans (CAPs) to these novel conditions (FCP v2.2 clause 7.19.6 requires and extra 30 days to be given to the clients to allow drafting of CAPs at CPRDR stage), (2) the team to respond to significant PR comment (which, in recent full assessments/reassessments has taken significantly longer than in the past), (3) the team to modify the report and scoring (as required) in the event of significant Peer Review or stakeholder comments, (4) if a new condition were to be raised following comments from the above mentioned stakeholders/PRs, this extension should cover the time required to draft and review new CAPs if and as required.</p>	
4	Implications for assessment	
	If the Variation Request is accepted, the client would benefit from an extra 60 days of certification, which would allow them to complete the client action plans. This extra 60 days would also allow the team to address any and all comment on the report, including the need to change scoring and raise new conditions if required. Other than an extension to the expiry date of the certificate, the CAB does not see any implications to the assessment, or other MSC requirements.	
5	Mitigation of the implication for assessment	
	This VR is in itself an attempt to mitigate risks of compressed timelines to the assessment and continuity of the certificate. The CAB welcomes any comment from the MSC on this matter, but the CAB does not believe any significant implications to the assessment will arise from this VR, and so mitigation is not required.	

6	How many conditions does the fishery have and will their progress be affected (positive or negative)?
	The fishery currently has nine conditions (all open, three raised at this reassessment, the others raised between surveillance audits 1 and 3 of the current certificate). Seven out of the nine conditions are management-related, and afforded a 12 month extension to their timelines (MSC COVID-19 Derogation 6), so a 60 day extension to the certificate will not have an impact on these. The other two conditions are outcome-related, and a 60 day extension to a certificate is not perceived to have an effect on either of these conditions.
7	What is the status of the current assessment?
	The Client and Peer Review Draft Report was sent to the clients and Peer Review College on 21/05/2021. The deadline for the submission of the Client Action Plans from the clients is 20/07/2021, at which point the team will determine whether the Action Plans are suitable to address the three new conditions raised.
8	Further comments
	NA
9	If applicable, additional information added after MSC's request