

Lloyd's Register

ISF Norwegian & Icelandic Herring trawl and seine

MSC Variation Request

1 Marine Stewardship Council variation request

Table 1 – Variation request

1	Date submitted to 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.
2	CAB
	Lloyd's Register
3	Fishery name and certificate number or CoC certificate number
	Icelandic & Norwegian Herring trawl and seine
4	Lead auditor or program manager
	Polly Burns
5	Request prepared by
	Polly Burns
6	Scheme requirement(s) for which variation requested
	FCR V2.0 7.11.1.2 The CAB shall draft conditions to follow the narrative or metric form of the PISGs used in the final tree. FCR V2.0 7.11.1.3 The CAB shall draft conditions to result in improved performance to at least the 80 level within a period set by the CAB but no longer than the term of the certification unless: etc... FCR V2.0 SA2.3.1 Teams shall only score this PI (<i>PI 1.1.2</i>) when Stock Status PI 1.1.1 does not achieve an 80 score.
7	How many times has a variation for this requirement been accepted for the same assessment of the same fishery?
	- e.g. Fill in 2 nd if a previous extension request on the 60 days requirement for surveillance reports has been accepted, and this request is for an additional time extension on top of that.
	2nd – previously applied for a variation under the equivalent requirements under FCR V1.3 for the surveillance audit scoring, which was accepted – this current variation request is for the reassessment (scored against FCR 2.0).

Table 1 – Variation justification

1	Proposed variation	
	<ul style="list-style-type: none"> Please describe how the CAB proposes to vary from the requirement including, where required, any original deadline date, the length of additional time requested and the exact modified deadline date. 	
	<p>When PI 1.1.1 is scored less than 80 during the certification cycle, and there is no rebuilding plan in place for the stock, following SA2.3.2 according to the MSC's interpretation:</p> <ul style="list-style-type: none"> The assessment team may choose to apply CR V2.0 SA2.3.1; The assessment team shall put a condition on PI 1.1.1 to have a rebuilding plan and monitoring in place, this condition timeline shall not be longer than 1 year breaching FCR V2.0 7.11.1.2; The assessment team shall not score PI Stock Rebuilding during the current audit, breaching FCR V2.0 SA2.3.1; Stock Rebuilding PI shall be scored within 1 year, during an expedited audit. The condition raised on PI 1.1.1 shall be closed within 1 years, beyond the current certification period and not reaching SG 80 for PI1.1.1b breaching FCR V2.0 7.11.1.2. 	
2	Additional time requested	
	Original deadline date	N/A
	Modified deadline date requested	N/A
	Length of additional time requested	N/A
3	Justification	
	<ul style="list-style-type: none"> Please explain in detail why the variation is requested and why the change is necessary. This helps the MSC decide whether the variation request should be granted. 	
	<p>During the recent surveillance audit for the ISF Icelandic and Norwegian herring trawl and seine fishery, PI 1.1.1 was rescored at less than 80. In March 2019, the MSC released an interpretation which confirmed how they expected scoring to occur when PI 1.1.1 was rescored at <80, normally triggering the rebuilding PI (PI 1.1.3 FCR1.3/PI 1.1.2 FCR2.0), but the fishery had a year to implement a rebuilding plan as per clause: FCR V1.3: CB2.4.2:</p> <p><i>In cases where stocks were not depleted at the time of assessment, but become depleted during a certification cycle, the CAB shall raise a condition that rebuilding strategies and monitoring are put in place within one year of becoming aware of the depleted status.</i></p> <p>FCR V2.0: SA2.3.2: In cases where stocks score 80 or above on PI 1.1.1 at the time of assessment, but scores are then reduced during a certification cycle, the team shall ensure that rebuilding strategies and monitoring are put in place within one year of becoming aware of the reduced status, (or as early as practicable in stocks that are not assessed on an annual basis).</p> <p>A variation request for V1.3 clauses was accepted given the CR has conflicting requirements to ensure the process could be followed in conformance.</p> <p>This fishery is currently in reassessment against V2.0 of the MSC CR. Given this fishery (and the overlapping Norway Spring Spawning herring fishery) are both due to have PCDRs published as part of the reassessment against FCRV2.0 before the rebuilding PI is scored, the MSC have released an addendum to the interpretation describing the process for this situation.</p> <p>As such, there are a number of clauses we are requesting to variate from:</p>	

	<p>1. The rebuilding PI which must be scored when 1.1.1b <SG80 (FCR V2.0 SA2.3.1) will not be scored for one year and will not be scored in the PCDR for the reassessment.</p> <p>2. The condition associated with SA2.3.2 will be applied to PI 1.1.1 but cannot follow the requirements of FCR V2.0 7.11.1.2 as the condition does not relate to the PISG of PI 1.1.1b.</p> <p>3. FCR V2.0 7.11.1.3 cannot be applied as:</p> <p>a) The condition will require that rebuilding strategies and monitoring are put in place within one year of being aware that the fishery is depleted. This condition will not result in 1.1.1b being ≥SG80 for 1.1.1b in one year;</p> <p>b) The condition will not be closed before the fishery is recertified</p>
4	If a fishery assessment, implications for assessment
	<ul style="list-style-type: none"> - Please include any impacts on the assessment/certificate if the request is accepted referencing any other requirements which may be affected, and the risks these implications could have. - e.g. Timeline delays, stakeholder input
	The fishery will require an expedited audit in January 2020 in order to score rebuilding and check status of condition on PI 1.1.1b.
5	If a fishery assessment, mitigation of the implication for assessment
	Please include information how risks of the implications for the assessment that have been identified under the previous question are proposed to be mitigated by the CAB.
	No mitigation required. An explanation of the process will be included in the PCDR and subsequent reports.
6	If a fishery assessment, how many conditions does the fishery have and will their progress be affected (positive or negative)?
	No implications for current conditions.
7	What is the status of the current assessment?
	<ul style="list-style-type: none"> - Please include the latest version and timing of the report that has been prepared, and an indication when the next report is expected (e.g. the Client and Peer Review Draft Report has been sent to the client and the peer reviewers on 7 June 2018. The Public Comment Draft Report is expected to be ready on 1 September 2018).
	The report has not currently been issued to the client. We expect a PCDR publication in June 201 (see Track a Fishery page for up-to-date timeline).
8	Further comments
	<ul style="list-style-type: none"> - Please include any further relevant information.
	None, thank you.
9	If applicable, additional information added after MSC's request

Template information and copyright

This document was drafted using the 'MSC Variation Request Form v3.0'.

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Template version control

Version	Date of publication	Description of amendment
1.0	1 January 2011	Date of application
1.1	24 October 2011	Updated to include a confidential information section
1.2	10 January 2012	Updated to include more detailed instructions on confidential information section
1.3	14 January 2013	Updated in line with requirements in MSC Certification Requirements v1.3, including P2 to P1 'expedited audit'
2.0	08 October 2014	Updates in line with release of Fisheries Certification Requirements v2.0
2.1	04 October 2016	Updated contact information
3.0	17 December 2018	Release alongside Fisheries Certification Process v2.1

A controlled document list of MSC program documents is available on the [MSC website](http://msc.org) (msc.org)

Senior Policy Manager
Marine Stewardship Council
Marine House
1 Snow Hill
London EC1A 2DH
United Kingdom

Phone: + 44 (0) 20 7246 8900
Fax: + 44 (0) 20 7246 8901
Email: standards@msc.org