SAI Global

MSC Poland flatfish trawl, gillnet and longline

MSC Variation Request

1 Introduction

This form details the information SAI Global is required to submit to the MSC to enable the MSC to consider an application to vary from a clause or requirement in any of the MSC program documents.

Once a Variation Request has been submitted the MSC will consider that request and will usually respond within 14 days.

2 Marine Stewardship Council variation request

Table 1. Variation request.	
1	Date submitted to MSC
	23 September 2020
2	CAB
	SAI Global
3	Fishery name and certificate number or CoC certificate number
	Poland flatfish trawl, gillnet and longline There is no certificate number as this fishery is not certified but under assessment.
4	Lead auditor or program manager
	Lead Auditor: Vito Romito
5	Request prepared by
	Vito Romito
6	Scheme requirement(s) for which variation requested
	MSC FCP v.2.1, §7.5.5 The CAB shall not change the UoA and UoC during the assessment unless the UoA is announced provisionally in the initial announcement and confirmed later in conformity with 7.17.3
7	How many times has a variation for this requirement been accepted for the same assessment of the same fishery?
	Zero times.

Table 2. Variation justification.

1	Proposed variation

SAI Global proposes to change the UoA and UoC despite not having announced them as provisional. The current assessment assesses 5 gear types: bottom and pelagic trawl, gillnet, trapnet and longline. The client would like to remove trapnet and longline gears from the gears under assessment and retain the other 3 gear types, bottom and pelagic trawl, and gillnet.

Current UoAs (as per ACDR)

Table 1. Unit(s) of Assessment (UoA).

UoAs 1 – 5: European (Baltic) flounder stock complex in ICES sub-division 26.		
Common to all UoAs		
Species		*Platichthys flesus and Platichtys solemdali*
Stock		Flounder stocks in ICES subdivision (SD) 26 and 28.
Geographical area		FAO 27 Atlantic Northeast, Baltic Sea, ICES subdivision 26.
Client group		Licensed vessels and processor entities part of the Client Group*
Other eligible fishers		Licensed vessels that are not member of the Client Group but are entitled to fish E flounder in ICES subdivision 26.
Unique to each UoA (harvest method)		
Fishing Gear	UoA 1	Demersal trawl
	UoA 2	Midwater trawl
	UoA 3	Gillnet
	UoA 4	Trapnet
	UoA 5	Longline
UoAs 6 – 10: European (Baltic) flounder stock complex in ICES sub-divisions 24 and 25		
Common to all UoAs		
Species		*Platichthys flesus and Platichtys solemdali*
Stock		Flounder stocks in ICES subdivisions 24 and 25 (west of Bornholm and southwestern Baltic)
Geographical area		FAO 27 Atlantic Northeast, Baltic Sea, ICES subdivisions 24 and 25 (west of Bornh southwestern central Baltic)
Client group		Licensed vessels and processor entities part of the Client Group*
Other eligible fishers		Licensed vessels that are not member of the Client Group but are entitled to fish E flounder in ICES subdivisions 24 and 25
Unique to each UoA (harvest method)		
Fishing Gear	UoA 6	Demersal trawl
	UoA 7	Midwater trawl
	UoA 8	Gillnet
	UoA 9	Trapnet
	UoA 10	Longline
UoAs 11 – 15: Turbot in ICES sub-divisions 22 – 32		
Common to all UoAs		
Species		*Scophthalmus maximus*
Stock		Turbot in ICES subdivisions 22-32 (Baltic Sea)
Geographical area		FAO 27 Atlantic Northeast, Baltic Sea, ICES subdivisions 22-32 (Baltic Sea)
Client group		Licensed vessels and processor entities part of the Client Group*
Other eligible fishers		Licensed vessels that are not member of the Client Group but are entitled to fish t ICES subdivisions 22-32
Unique to each UoA (harvest method)		
Fishing Gear	UoA 11	Demersal trawl
	UoA 12	Midwater trawl

Table 2. Variation justification.

	UoA 13	Gillnet	
	UoA 14	Trapnet	
	UoA 15	Longline	
UoAs 16 – 20: Plaice in ICES sub-division 24 – 32			
Common to all UoAs			
Species		*Pleuronectes platessa*	
Stock		Plaice in ICES subdivisions 24-32 (Baltic Sea excluding the Sound and Belt Seas)	
Geographical area		FAO 27 Atlantic Northeast, Baltic Sea, ICES subdivisions 24-32 (Baltic Sea excluding the Sound and Belt Seas)	
Client group		Licensed vessels and processor entities part of the Client Group*	
Other eligible fishers		Licensed vessels that are not member of the Client Group but are entitled to fish Plaice in ICES subdivisions 24-32	
Unique to each UoA (harvest method)			
Fishing Gear	UoA 16	Demersal trawl	
	UoA 17	Midwater trawl	
	UoA 18	Gillnet	
	UoA 19	Trapnet	
	UoA 20	Longline	

***Entities making up the client group**

CG entity #	Client group entity (i.e. individual CG entity)	Group (i.e. grouping of CG entities)	Activity
1	Kolobrzeg Fish Producers Group	Kolobrzeg Fish Producers Group	Harvesting and Processing
2	National Chamber of Fish Producers - Ustka	National Chamber of Fish Producers - Ustka	Other
3	Fish Producers Organization - Baltic - Kolobrzeg	Fish Producers Organization - Baltic - Kolobrzeg	Harvesting and Processing
4	Fish Producers Organization - Wladyslawowo	Fish Producers Organization - Wladyslawowo	Harvesting and Processing
5	KOGA-MARIS Ltd.	Fish Producers Organization - Wladyslawowo	Harvesting and Processing
6	MACHRYB Chojka Mojsiewicz GP.	Fish Producers Organization - Baltic - Kolobrzeg	Harvesting and Processing
7	PIEMAR Ltd.	Fish Producers Organization - Baltic - Kolobrzeg	Harvester Only
8	SZKUNER Ltd.	Fish Producers Organization - Wladyslawowo	Harvesting and Processing

New proposed UoAs

Table 2. Unit(s) of Assessment (UoA).

UoAs 1 – 3: European (Baltic) flounder stock complex in ICES sub-division 26.	
Common to all UoAs	
Species	*Platichthys flesus and Platichtys solemdali*
Stock	Flounder stocks in ICES subdivision (SD) 26 and 28.
Geographical area	FAO 27 Atlantic Northeast, Baltic Sea, ICES subdivision 26.
Client group	Licensed vessels and processor entities part of the Client Group*
Other eligible fishers	Licensed vessels that are not member of the Client Group but are entitled to fish European flounder in ICES subdivision 26.

Table 2. Variation justification.

	Unique to each UoA (harvest method)		
	Fishing Gear	UoA 1	Demersal trawl
		UoA 2	Midwater trawl
		UoA 3	Gillnet
	UoAs 4 - 6: European (Baltic) flounder stock complex in ICES sub-divisions 24 and 25		
	Common to all UoAs		
	Species		*Platichthys flesus and Platichtys solemdali*
	Stock		Flounder stocks in ICES subdivisions 24 and 25 (west of Bornholm and southwestern central Baltic)
	Geographical area		FAO 27 Atlantic Northeast, Baltic Sea, ICES subdivisions 24 and 25 (west of Bornholm and southwestern central Baltic)
	Client group		Licensed vessels and processor entities part of the Client Group*
	Other eligible fishers		Licensed vessels that are not member of the Client Group but are entitled to fish European flounder in ICES subdivisions 24 and 25
	Unique to each UoA (harvest method)		
	Fishing Gear	UoA 4	Demersal trawl
		UoA 5	Midwater trawl
		UoA 6	Gillnet
	UoAs 7 – 9: Turbot in ICES sub-divisions 22 – 32		
	Common to all UoAs		
	Species		*Scophthalmus maximus*
	Stock		Turbot in ICES subdivisions 22-32 (Baltic Sea)
	Geographical area		FAO 27 Atlantic Northeast, Baltic Sea, ICES subdivisions 22-32 (Baltic Sea)
	Client group		Licensed vessels and processor entities part of the Client Group*
	Other eligible fishers		Licensed vessels that are not member of the Client Group but are entitled to fish turbot in ICES subdivisions 22-32
	Unique to each UoA (harvest method)		
	Fishing Gear	UoA 7	Demersal trawl
		UoA 8	Midwater trawl
		UoA 9	Gillnet
	UoAs 10 - 12: Plaice in ICES sub-division 24 – 32		
	Common to all UoAs		
	Species		*Pleuronectes platessa*
	Stock		Plaice in ICES subdivisions 24-32 (Baltic Sea excluding the Sound and Belt Seas)
	Geographical area		FAO 27 Atlantic Northeast, Baltic Sea, ICES subdivisions 24-32 (Baltic Sea excluding the Sound and Belt Seas)
	Client group		Licensed vessels and processor entities part of the Client Group*
	Other eligible fishers		Licensed vessels that are not member of the Client Group but are entitled to fish Plaice in ICES subdivisions 24-32
	Unique to each UoA (harvest method)		
	Fishing Gear	UoA 10	Demersal trawl
		UoA 11	Midwater trawl
		UoA 12	Gillnet
2	Additional time requested		
	Original deadline date	NA	
	Modified deadline date requested	NA	
	Length of additional time requested	NA	
3	Justification		

Table 2. Variation justification.	
	The current assessment assesses 5 gear types: bottom and pelagic trawl, gillnet, trapnet and longline. During the site visit held on the 7th-10th September 2020, information collected by the assessment team showed that only small amounts of flatfish are caught accidentally in longline and trapnet gears, which are instead used primarily to target and catch salmon and trout (i.e. longline) and other coastal fish such as perch, pike perch and roach (i.e. trapnets). The main gears used to target and catch flatfish in Poland are demersal trawl, demersal gillnet and pelagic trawl. As a consequence, the client group confirmed their wish to remove trapnet and longline from the scope of the full assessment.
4	If a fishery assessment, implications for assessment
	If the VR is granted, the main implication is that the assessment will be more applicable and specific to the actual flatfish fishing activities that occur in Polish waters. The Client and Peer Review Draft Report will be updated to reflect the change in UoAs. **Traceability Implications** All Polish vessels require a permit to fish for a given species which is related to the ICES sub-division they fish within, for example, ICES sub-division 24 or ICES subdivision 25, 26. Fishing permits issued by the fishery administration are vessels specific and indicate the species that can be caught, the areas that can be fished, the gear allowed, and quotas specifications. Catches must be precisely recorded and segregated by the area they are caught in. The use of more than one fishing gear during a fishing trip is not allowed and fishers are obliged to indicate the used gear in logbooks. Catch is recorded in logbooks; most of the fleet (80%) use electronic logbooks which transfers data electronically to the Fisheries Monitoring Centre (FMC) in Poland. Smaller vessels use paper logbooks and this data is also submitted to the FMC. Catches are kept segregated by area in the refrigerated seawater tanks onboard the vessel. Specification of species catches by gear type is sent to the FMC while at sea and then later validated at landing. All vessels have to report catches and related information at landing. Inspectors from the Fisheries Inspectorate are present during landing and check the correctness of the information reported in the logbooks and that no gears are kept on board other than the declared one. Transhipment is prohibited. A monitoring and compliance system exist. At landing, the catch is either sold or stored prior to sale. All client group members undertake the following activities themselves; unloading of the vessel, transport to storage or sale and storage. Permitting, recording, storage and inspection of catches is species, gear and area specific. There are no obvious risks in relation to segregation or mixing of catches between certified and of non-certified gears. Traceability systems can easily identify and separate catches by different gear types. This has been discussed at length and validated during the site visit meetings held on week commencing the 7th of September 2020.
5	If a fishery assessment, mitigation of the implication for assessment
	No risks have been identied that may be associated with the VR in question.
6	If a fishery assessment, how many conditions does the fishery have and will their progress be affected (positive or negative)?
	N/A. The fishery is not currently certified.
7	What is the status of the current assessment?

Table 2. Variation justification.	
	The lastest version of the report is the ACDR. The assessment team conducted the remote site visit on the week commencing the 7th September 2020. The Client and Peer Review Draft Report is expected to be ready by the 15th of October 2020.
8	Further comments
	If the VR is accepted, the name of the fishery will be changed to reflect the change in the UoAs and gear type reduction. The name will likely be changed to *Poland flatfish trawl and gillnet.*
9	If applicable, additional information added after MSC's request
	NA

3 Template information and copyright

This document was drafted using the 'MSC Variation Request Form v3.1'. While amendments have been made to formatting in order to comply with SAI Global's corporate identity, SAI Global has ensured that content and structure follow that of the original template.

Table 3. 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
3.1	28 March 2019	Non-substantive changes to improve clarity and usability

A controlled document list of MSC program documents is available on the MSC website (msc.org).

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