

# Marine Stewardship Council - Variation Request

<b>Date submitted to MSC</b>	July 21, 2018
<b>Name of CAB</b>	SCS Global Services
<b>Fishery Name/CoC Certificate Number</b>	F-SCS-0104
<b>Lead Auditor/Programme Manager</b>	Dr Sabine Daume
<b>Scheme requirement(s) for which variation requested</b>	FCR 7.23.18 This Surveillance Report shall be forwarded to the MSC within 60 days of completing the audit, for publication on the MSC website.
<b>Is this variation sought in order to fulfil IPI requirements (FCR 7.4.14)?</b>	No

## 1. Proposed variation

SCS requests a one-month extension to the due date for an MSC surveillance audit report (within 90 days instead of within 60 days) to the 21<sup>st</sup> August 2018.

## 2. Rationale/Justification

The Western Australian rock lobster fishery is on a reduced surveillance cycle. This year's surveillance audit was a "review of information". Two conditions were raised during the recertification of the fishery in 2017, both related to bait use in the fishery which is covered under indicator 2.1.1. These conditions are not due to be closed out until the third annual surveillance audit in 2019.

Staff of the management agency, DPIRD, submitted a discussion paper to establish if guidance to score the related PI 2.1.1 in FCR v 2.0, could be utilised to close out the conditions. The argument was made that when the fishery will go through re-assessment again in 2020 FCR v 2.0 will be used and the fishery would meet the SG 80 guidepost, therefore no condition would be imposed. This discussion paper was submitted to the MSC for procedural consideration, but no formal reply has been received. The client initiated the discussion ahead of the surveillance audit.

The relevant research and management agency (DPIRD) has undergone significant restructuring recently, with the loss of several key DPIRD staff members. This has significantly impacted upon time allocations and priorities to respond and renegotiate a revised client action plan with all stakeholders. In order, to negotiate with stakeholders and for the auditor to evaluate the revised CAP relative to the open conditions if necessary based on MSC responses to the discussion paper, we are proposing a 1-month extension to the surveillance audit 60-day reporting timeframe.

Given that the client and DPIRD initiated discussions on this matter with the CAB and submitted the discussion paper to the MSC ahead of the audit and are still waiting for a formal response, we believe it is reasonable to request a one-month extension. Such a time-frame will enable the Client and DPIRD staff to provide a revised CAP and give the Auditor sufficient time to review it.

<b>3. Implications for assessment (required for fisheries assessment variations only)</b>	
None. The surveillance report will be submitted within 90 days instead of within 60 days. The surveillance was conducted nearly 1 month prior to the certificate anniversary date, so this delay will not affect the ability of the fishery to continue conducting surveillance audits near the anniversary date.	
<b>4. Have the stakeholders of this fishery assessment been informed of this request? (required for fisheries assessment variations only)</b>	No. Stakeholders will be informed via this variation request.
<b>5. Further Comments</b>	
None	