

Global Trust Certification

ISF Iceland greater silver smelt

MSC Variation Request

1 Introduction

This form details the information Global Trust 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
	9 March 2022
2	CAB
	Global Trust Certification Limited
3	Fishery name and certificate number or CoC certificate number
	ISF Iceland greater silver smelt. No certificate number as initial assessment.
4	Lead auditor or program manager
	Conor Donnelly
5	Request prepared by
	Conor Donnelly
6	Scheme requirement(s) for which variation requested
	7.8.1 The CAB shall nominate a date from which product from a certified fishery is eligible to be sold as MSC certified or bear the MSC ecolabel (the eligibility date).
	7.8.1.1 The date shall be any nominated date on or between the publication date of the first Public Comment Draft Report and the certification date.
	(MSC FCP v2.2)
7	How many times has a variation for this requirement been accepted for the same assessment of the same fishery?
	None

Table 2. Variation justification.

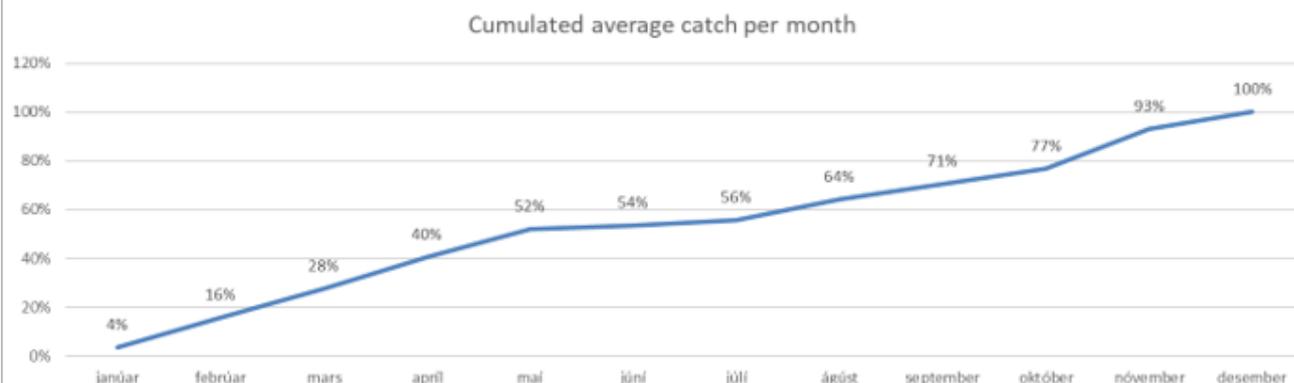
1	Proposed variation
	The FCP v2.2, in section 7.8.1.1, specifies that the earliest eligibility date is from the publication date of the first Public Comment Draft Report (PCDR). This variation is to seek an earlier eligibility date, namely the announcement of the fishery on 4 th February 2022.
2	Additional time requested

Table 2. Variation justification.

Original deadline date	Not applicable
Modified deadline date requested	Not applicable
Length of additional time requested	Not applicable

3 Justification

The variation is requested because a significant proportion of the catches occur in the first half of the year, i.e. prior to the estimated date for the publication of the PCDR, in mid-July 2022. Over the last three years 2019-2021, on average 56% of catches are taken up to and including July. As such, an eligibility date starting in July or later will mean the bulk of the catches in 2022 will not be eligible should the UoAs be successfully certified.



Also, there are well established traceability mechanisms in place in the UoAs that mean there are not significant additional risks from selecting an earlier eligibility date.

4 Implications for assessment

No significant impacts on the assessment are anticipated should this request be accepted.

The main issues that might arise from setting an eligibility date earlier than the PCDR relate to potential changes to the Unit(s) of Assessment following consultation on the assessment reports or significant traceability issues arising.

Changes in the UoA are not considered likely given that the UoA has been designed to be as inclusive as possible – covering the whole fleet and all greater silver smelt caught by the main gears used to catch the stock (bottom trawl and pelagic trawl – together representing 99.9% of total catches of the stock). The Icelandic traceability system is a mature and robust system that has been assessed in 11 existing certificates, the earliest of which have been in place since 2012. This fishery involves vessels that are catching within these existing certified fisheries (e.g. golden redfish within UoA 1 which is part of the multi-species demersal certificate and Icelandic summer spawning herring in UoA 2). As such significant traceability issues are not expected. In addition, it is a pre-requisite of ISF membership that all members be MSC Chain of Custody certified.

Requirements in place in the FCP (i.e. section 7.8.2) mean any issues identified later in the process do not risk the integrity of any subsequent certificate but the above should give confidence that these issues are not more likely to arise because the eligibility is set to an earlier date.

5 Mitigation of the implication for assessment

The mitigation to address the risks identified in the previous section is covered to a greater extent by the existing Fishery Process Requirements set out in section 7.8.2. This requires that any fish harvested after the eligibility date must be sold or stored as under-assessment fish and:

- Clearly identified and segregated from certified and non-certified products.
- The client shall maintain full traceability records for all under-assessment product, demonstrating traceability back to the UoC and including the date of harvest.
- Under-assessment products shall not be sold as certified or labelled with the MSC ecolabel, logo, or trademarks until fishery certification and product eligibility are confirmed.

Table 2. Variation justification.

	<p>Traceability risks are considered low. Existing tracking, tracing and traceability systems within Iceland are well able to ensure product is fully traceable back to the point and date of harvest by the UoC and to the point where it enters further certified chains of custody.</p> <p>In summary, catches and landings in Iceland are monitored and recorded in a number of complementary ways. Landings are recorded 'at sea' via vessel logbooks which are verified and standardised through physical weighing at accredited weigh stations in landings ports throughout Iceland. The vessel log book system requires that the operator of a vessel reports information for each haul of the fishing gear to the Directorate including; haul number, date, time, latitude, longitude, catch by species, zone, water depth, seafloor, wind direction, wind speed, gear used, as well as other information.</p> <p>All landing harbours around the coast of Iceland, are equipped with calibrated weighing scales operated by official weighers. To ensure correct catch reporting, it is mandatory to land catches of all species in authorized ports, where they are weighed by officially licensed weighers using certified scales. As required by Icelandic law, each landing generates a weighing receipt recording, <i>inter alia</i>, the vessel name, registration number and district number; the landing port and date of landing; name of seller, buyer and recipient of the catch; official weight by species of the catch; the number, type and weight of tubs/boxes/barrels; the fishing gear used; the total number of pallets. This ensures fish remain segregated by vessel, species and gear following landing.</p> <p>The weight registration document for each vessel is transmitted to the Fisheries Directorate who record it on their Catch Registration System, compare it with the corresponding e-logbook information and make the appropriate reductions to the vessels' quota. Data on catches and landings are therefore available in near real-time via a shared database accessible by both the Directorate (for management/enforcement purposes) and the MFRI (for scientific purposes).</p> <p>Where it occurs, the involvement of contractors in Icelandic fisheries is limited to providing services such as the transportation of the catch, typically in large tubs, from first point of landing to a processing facility, without actually take ownership of the fish. Client group companies may also sometimes use sub-contracted cold storage facilities but where this is the case all catches are identified and traceable to vessel, catch dates, gear and fishing area.</p> <p>It is a pre-requisite of ISF membership that all members be MSC Chain of Custody certified.</p> <p>Consequently, the traceability risks associated with an earlier eligibility date are considered to be low.</p>
6	<p>How many conditions does the fishery have and will their progress be affected (positive or negative)?</p> <p>None (initial assessment)</p>
7	<p>What is the status of the current assessment or audit?</p> <p>Fishery was announced and ACDR published on 4th February 2022. Site visit scheduled for 11th – 14th April 2022. Next report is Client and Peer Review Draft Report, which is expected to be ready by 16th May 2022.</p>
8	<p>Further comments</p> <p>No further comments.</p>
9	<p>If applicable, additional information added after MSC's request</p>

3 Template information and copyright

This document was drafted using the 'MSC Variation Request Form – Fisheries v1.0'. While amendments have been made to formatting in order to comply with Global Trust Certification's corporate identity, Global Trust has ensured that content and structure follow that of the original template.

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Table 3. Template version control.

Version	Date of publication	Description of amendment
1.0	25 March 2020	Release alongside Fisheries Certification Process v2.2

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

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