

Paul Knapman

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Sent by email

Date: 17th November 2011



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Subject: Request for variation to the MSC scheme requirement FCM 6.8.2 (now CR 27.22.13)

Dear Paul Knapman,

I write with reference to your submission on the 8th November 2011 of a request for variation to the MSC scheme requirements to allow the surveillance report for the Pacific hake mid-water trawl fishery to be submitted late.

As you are aware, the FCM (now CR) procedures relating to surveillance audits are integral to ensuring all MSC accredited certification bodies operate in a consistent and transparent manner. The MSC intends that these requirements be met across all fisheries and CoC certificate holders, except in exceptional, well-justified circumstances, as part of the MSC scheme.

MSC notes that this is the second variation request for FCM 6.8.2 (now CR 27.22.13) received for this fishery relating to this surveillance reporting period. The MSC accepted a request made on 24th October 2011 to delay by 20 days (that is, until the 14th of November 2011) the deadline for submitting the report. This was to account for the late receipt of information and allow time for client review.

In this case the MSC is willing to grant a further variation to the scheme requirements. We wish to make clear however, that to ensure the credibility of the MSC programme we do not intend to grant such revisions of extended timelines in the future, without good cause.

The assessment of time needed to complete the reporting should thus have been made prior to the audit. The nature of the fishery has not changed since certification and the complexity of the fishery should have been factored into the audit planning and the first variation request. MSC's acceptance of this revised variation request is based on the understanding that IMMs review of their reporting procedures will prevent such rescheduling recurring in the future. MSC thus expects that realistic timeframes will be allowed for any such future requests.

If you have any questions regarding this response, please do not hesitate to contact me.

Best regards,

A handwritten signature in black ink, appearing to read 'David Hoggan', written in a cursive style.

Marine Stewardship Council

cc: ASI, Steve Devitt