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Sent by email

Date: 11/04/2019

Subject: Request for variation to the MSC Certification Requirement v2.0 FCR-7.4.10 for Russian and Estonian Lake Peipus perch and pike-perch

Dear Julia Nebolsina,

I write with reference to your submission on 05/04/2019 of a request for variation to the MSC Certification Requirement (CR) to allow:

To modify the UoA to:

- a) include all licensed fishers in Russia and Estonian waters of Lake Peipus as 'other eligible fishers'
- b) separate Russian and Estonian jurisdictions as separate UoAs – effectively doubling the number of UoAs from 4 to 8

This would not require any changes from original timeline.

As you are aware, the CR procedures relating to v2.0 FCR-7.4.10 state:

7.4.10 The CAB shall not change the UoA and UoC during the assessment unless:

7.4.10.1 The UoA is announced provisionally in the initial announcement and confirmed later in conformance with 7.10.2

These are integral to ensuring all MSC accredited Conformity Assessment 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 programme.

MSC notes the factors presented supporting your request, including:

- At the recent site visit it was clear that the information to be used for the assessment (notably catch data) is that collected at a national level (rather than a UoC sub-section). Accordingly, the assessment will necessarily involve all fishers in both Estonia and Russia.
- The client expressed a willingness to extend access to the certificate to all other fishers, in both Estonia and Russia, which may supply fish to the client group. This is seen as a positive outcome for certification of fisheries in Lake Peipus.
- Consideration of harmonisation with other fisheries, a harmonisation discussion with overlapping assessment teams, and discussion with scientists and managers, indicated distinctions between Russian and Estonian management that would be most clearly dealt with by scoring the two systems separately. Hence it is proposed to increase the number of Units of Assessment to include Russian and Estonian fisheries separately.
- Without prejudice, no stakeholders expressed any concerns with this potential modification to the UoAs.
- The 'other eligible fishers' use exactly the same gear in the same way.
- This inclusion of 'other eligible fishers' would mirror the situation already in place for the Estonian 'Lake Peipus Perch and Pikeperch Fishery' (certified) and 'Russian Lake Peipus Perch and Pikeperch Fishery'.
- The other eligible fishers were considered at the site visit.
- Consultations with stakeholders were carried out on the basis of the effects of each of the Estonian and Russian fisheries in toto – so the effects of both fisheries were considered with stakeholders (re 7.9.1.1) . Preliminary scoring has also been carried out on this basis (re 7.10.1) – all fishers in both Estonian and



Russian waters.

- This will also simplify harmonisation with existing fisheries in both jurisdictions.

Given the rationale provided, the MSC is willing to grant a variation to the CR in this case subject to the following conditions:

- All stakeholders are informed of changes to the UoAs/UoCs; and,
- Ecert is updated to reflect changes in UoC.
- The notification report is updated to reflect changes to the UoAs / UoCs

If you have any questions regarding this response, please do not hesitate to contact the relevant Fisheries Assessment Manager for this fishery.

Marine Stewardship Council

cc: Accreditation Services International