Polly Burns
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EH12 9DQ

Sent by email

Date: 13/02/2019

Dear Polly Burns,

I write with reference to your submission on 11/12/2018 of a request for variation to the MSC Certification Requirement (CR) to allow:

For fisheries scored against v1.3
- All tuna fisheries currently on v1.3 will be upgraded to v2.0 at the next surveillance audit
- CABs shall follow the process requirements in Appendix B that have been prepared specifically for P1 upgrades
- If the stock has already been fully assessed against FCR v2.0 at the time of rescoring, a reduced upgrade process applies that does not require peer review and additional reporting requirements; fisheries for which this is applicable are identified in Appendix A
- No suspension action will be undertaken for fisheries that are behind target on P1 conditions raised against v1.3
- Any new conditions raised as a result of the Principle 1 rescoring will be harmonised with other tuna fisheries and aligned with the stock-specific condition deadlines set out in Appendix A

For fisheries already scored against v2.0
- Principle 1 conditions and timelines will be harmonised for all tuna fisheries on the same stock
- A shared deadline for achievement of conditions, based on the most recent RFMO workplan, will be set as per the calendar years specified in Appendix A

For all fisheries
- To facilitate harmonisation efforts between CABs, surveillance schedules of the relevant tuna fisheries will be aligned (to the extent that is practical) so that annual progress can be assessed collectively by CABs

This may vary against one or more of the following requirements, depending on the fishery circumstances:

1. Fisheries scored against v1.3:

Implementation timeframes: Existing fisheries (in assessment or certified) shall apply the new standard requirements (…) at their first reassessment commencing after 1st October 2017. (FCR V2.0 p. 9)

FCR V.2.0 7.23.13.1.b.i. If the progress against the measurable outcomes, expected results or (interim) milestones specified when setting the condition is judged to be behind target, the CAB shall specify the remedial action, and any revised milestones, that are required to bring process back on track within 12 months to achieve the original condition by the original deadline.

FCRv2.0 7.23.13.2: In the event that the CAB determines that progress against a condition is not back 'on target' within 12 months of falling 'behind target', the CAB shall:
a. Consider progress as inadequate.

b. Apply the requirements of GCR 7.4 (suspension or withdrawal).

For fisheries with conditions under Principle 1 subject to harmonization:

FCRv2.0 7.11.1.3 (and subclauses): The CAB shall draft conditions to result in improved performance to at least the 80 level within a period set by the CAB but no longer than the term of the certification unless: a. There are exceptional circumstances, and the CAB determines that achieving a performance level of 80 may take longer than the period of certification. The CAB shall interpret exceptional circumstances in 7.11.1.3.a to refer to situations in which, even with perfect implementation, achieving the 80 level of performance may take longer than the certification period.

FCRv2.0 7.24.2 (and subclauses): When conducting a re-assessment of a certified fishery, the CAB shall (…) evaluate progress against certification conditions. Unless exceptional circumstances apply (7.11.1.3) or paragraph (b) applies, the fishery shall have met all conditions and milestones. (…) In the event that there are unmet conditions, the CAB shall apply 7.23.13.1 and 7.23.13.2 (except 7.23.13.2.b.) in determining the adequacy of progress against those conditions and milestones. If the CAB concludes that the client has made inadequate progress, it shall not grant a new fishery certificate.

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:

- This variation will contribute to an alignment of P1 condition timelines between certified HMS fisheries.
- This will in theory incentivise all parties fishing on a particular HMS stock to work towards a common deadline for meeting shared P1 conditions.
- Fisheries currently scored against v1.3 will be rescored against v2.0 for Principle 1 at the next available opportunity
- Conditions on PI 1.2.2 (HCRs) and PI 1.2.1 (harvest strategy), and their associated timelines, will be harmonized between all UoAs that share the same P1 stock
- Timelines for achieving the conditions will be set in line with RFMO workplans for developing HCRs and harvest strategies (ranging between 2021 and 2023)
- This variation request covers only certified and harmonised fisheries; for new or in assessment fisheries, CABs instead propose to use existing mechanisms to achieve harmonization

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

- Where applicable, rescoring against v2.0 is to be undertaken at the next surveillance audit and shall follow the process requirements set out in Appendix B
- Relevant P1 conditions shall be closed by the proposed dates given in Appendix A as per FCP v2.1 7.28.16.1.b.i and 7.28.16.2 and GCR v2.2 7.4.2.b
- All new or in assessment fisheries for which harmonisation is required must be aligned with the applicable timelines given in Appendix A, as per the guidance in the FCP v2.1
- CABs shall make efforts to ensure the language of the conditions and milestones is consistent between harmonised fisheries
- CABs should make good faith efforts to coordinate surveillance with overlapping fisheries
- Reassessments shall be undertaken on usual timelines

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

Appendix A

List of relevant tuna fisheries and associated actions

February 2019

Fishery name	Stock	P1 upgrade required?	P1 upgrade type	CAB proposal condition deadline	Part of variation request?	Action required
North West Atlantic Canada Harpoon swordfish	AO-SWO-N	Yes	Full	n/a	Yes	P1 rescored against v2.0 at first opportunity (no alignment of condition timelines required)
North West Atlantic Canada Longline swordfish	AO-SWO-N	Yes	Full	n/a	Yes	P1 rescored against v2.0 at first opportunity (no alignment of condition timelines required)
US North Atlantic swordfish, yellowfin and albacore	AO-SWO-N	Yes	Full	n/a	Yes	P1 rescored against v2.0 at first opportunity (no alignment of condition timelines required)
US North Atlantic swordfish, yellowfin and albacore	AO-YFT	Yes	Full*	2022	Yes	P1 rescored against v2.0 at first opportunity (no alignment of condition timelines required)
Northeastern Tropical Pacific Purse Seine SKJ and YFT	EPO-SKJ	Yes	Full*	n/a	Yes	P1 rescored against v2.0 at first opportunity (no alignment of condition timelines required)

Fishery name	Stock	P1 upgrade required?	P1 upgrade type	CAB proposal condition deadline	Part of variation request?	Action required
French Polynesia albacore and yellowfin longline fishery	EPO-YFT	No	n/a	n/a	Yes	No P1 upgrade or alignment of condition timelines required
Echebastar Indian Ocean Purse Seine Skipjack Tuna	IO-SKJ	No	n/a	n/a	Yes	No P1 upgrade or alignment of condition timelines required
Maldives Pole and Line Tuna Skipjack	IO-SKJ	No	n/a	n/a	Yes	No P1 upgrade or alignment of condition timelines required
AAFA and WFOA North Pacific albacore tuna	PO-ALB-N	No	n/a	2023	Yes	Condition timelines to be aligned with relevant proposed deadline at next surveillance audit
American Samoa EEZ Albacore and Yellowfin Longline Fishery	PO-ALB-S	No	n/a	2021	Yes	Condition timelines to be aligned with relevant proposed deadline at next surveillance audit
Fiji albacore and yellowfin longline	PO-ALB-S	No	n/a	2021	Yes	Condition timelines to be aligned with relevant proposed deadline at next surveillance audit
French Polynesia albacore and yellowfin longline fishery	PO-ALB-S	No	n/a	2021	Yes	Condition timelines to be aligned with relevant proposed deadline at next surveillance audit
New Zealand Albacore Troll Fishery	PO-ALB-S	No	n/a	2021	Yes	No P1 upgrade or alignment of condition timelines required
New Zealand Talley's skipjack	WPO-SKJ	No	n/a	2021	Yes	No P1 upgrade or alignment of condition timelines required
PNA skipjack and yellowfin tuna	WPO-SKJ	No	n/a	2021	Yes	Condition timelines to be aligned with relevant proposed deadline at next surveillance audit

Fishery name	Stock	P1 upgrade required?	P1 upgrade type	CAB proposal condition deadline	Part of variation request?	Action required
WPSTA purse seine free school yellowfin and skipjack	WPO-SKJ	No	n/a	2021	Yes	Condition timelines to be aligned with relevant proposed deadline at next surveillance audit
American Samoa EEZ Albacore and Yellowfin Longline Fishery	WPO-YFT	No	n/a	2021	Yes	Condition timelines to be aligned with relevant proposed deadline at next surveillance audit
Fiji albacore and yellowfin longline	WPO-YFT	No	n/a	2021	Yes	Condition timelines to be aligned with relevant proposed deadline at next surveillance audit
French Polynesia albacore and yellowfin longline fishery	WPO-YFT	No	n/a	2021	Yes	Condition timelines to be aligned with relevant proposed deadline at next surveillance audit
PNA skipjack and yellowfin tuna	WPO-YFT	No	n/a	2021	Yes	Condition timelines to be aligned with relevant proposed deadline at next surveillance audit
WPSTA purse seine free school yellowfin and skipjack	WPO-YFT	No	n/a	2021	Yes	Condition timelines to be aligned with relevant proposed deadline at next surveillance audit
North Atlantic albacore artisanal fishery	AO-ALB-N	Yes	Reduced	n/a	Yes	P1 rescored against v2.0 at first opportunity (no alignment of condition timelines required)
US North Atlantic swordfish, yellowfin and albacore	AO-ALB-N	Yes	Reduced	n/a	Yes	P1 rescored against v2.0 at first opportunity (no alignment of condition timelines required)
Northeastern Tropical Pacific Purse Seine SKJ and YFT	EPO-YFT	Yes	Reduced	n/a	Yes	P1 rescored against v2.0 at first opportunity (no alignment of condition timelines required)
CHMSF British Columbia albacore tuna North Pacific	PO-ALB-N	Yes	Reduced	2023	Yes	P1 rescored against v2.0 at first opportunity AND condition timelines to be aligned with relevant proposed deadline

Fishery name	Stock	P1 upgrade required?	P1 upgrade type	CAB proposal condition deadline	Part of variation request?	Action required
Japanese skipjack and albacore pole and line	PO-ALB-N	Yes	Reduced	2023	Yes	P1 rescored against v2.0 at first opportunity AND condition timelines to be aligned with relevant proposed deadline
SZLC, CSFC & FZLC Cook Islands EEZ South Pacific albacore & yellowfin longline	PO-ALB-S	Yes	Reduced	2021	Yes	P1 rescored against v2.0 at first opportunity AND condition timelines to be aligned with relevant proposed deadline
Walker Seafood Australian albacore, yellowfin tuna, and swordfish longline	PO-ALB-S	Yes	Reduced	2021	Yes	P1 rescored against v2.0 at first opportunity AND condition timelines to be aligned with relevant proposed deadline
Japanese skipjack and albacore pole and line	WPO-SKJ	Yes	Reduced	2021	Yes	P1 rescored against v2.0 at first opportunity AND condition timelines to be aligned with relevant proposed deadline
Solomon Islands skipjack and yellowfin tuna	WPO-SKJ	Yes	Reduced	2021	Yes	P1 rescored against v2.0 at first opportunity AND condition timelines to be aligned with relevant proposed deadline
TriMarine Western and Central Pacific Skipjack and Yellowfin Tuna	WPO-SKJ	Yes	Reduced	2021	Yes	P1 rescored against v2.0 at first opportunity AND condition timelines to be aligned with relevant proposed deadline
Solomon Islands skipjack and yellowfin tuna	WPO-YFT	Yes	Reduced	2021	Yes	P1 rescored against v2.0 at first opportunity AND condition timelines to be aligned with relevant proposed deadline
SZLC, CSFC & FZLC Cook Islands EEZ South Pacific albacore & yellowfin longline	WPO-YFT	Yes	Reduced	2021	Yes	P1 rescored against v2.0 at first opportunity AND condition timelines to be aligned with relevant proposed deadline
TriMarine Western and Central Pacific Skipjack and Yellowfin Tuna	WPO-YFT	Yes	Reduced	2021	Yes	P1 rescored against v2.0 at first opportunity AND condition timelines to be aligned with relevant proposed deadline
Walker Seafood Australian albacore, yellowfin tuna, and swordfish longline	WPO-YFT	Yes	Reduced	2021	Yes	P1 rescored against v2.0 at first opportunity AND condition timelines to be aligned with relevant proposed deadline

Fishery name	Stock	P1 upgrade required?	P1 upgrade type	CAB proposal condition deadline	Part of variation request?	Action required
ACTEMSA-LEAL SANTOS pole and line West Atlantic skipjack fishery	AO-SKJ-W	n/a	n/a	2022	No	Condition timelines to be aligned with relevant proposed deadline, within assessment if possible or at 1st SA following FCP 2.1
Sant Yago TF Unassociated purse seine Atlantic yellowfin tuna fishery	AO-YFT	n/a	n/a	2022	No	Condition timelines to be aligned with relevant proposed deadline, within assessment if possible or at 1st SA following FCP 2.1
Pan Pacific yellowfin, bigeye and albacore longline fishery	EPO-BET	n/a	n/a	n/a	No	Condition timelines to be aligned with relevant proposed deadline, within assessment if possible or at 1st SA following FCP 2.1
Panama tropical Pacific yellowfin and skipjack purse seine tuna fishery	EPO-SKJ	n/a	n/a	n/a	No	Condition timelines to be harmonised with overlapping fishery (no RFMO workplan exists), either as part of assessment or at 1st SA following FCP 2.1
Pan Pacific yellowfin, bigeye and albacore longline fishery	EPO-YFT	n/a	n/a	n/a	No	No conditions expected therefore no action
Panama tropical Pacific yellowfin and skipjack purse seine tuna fishery	EPO-YFT	n/a	n/a	n/a	No	No conditions expected therefore no action
Ishihara Marine Products albacore and skipjack pole and line fishery	PO-ALB-N	n/a	n/a	2023	No	Condition timelines to be aligned with relevant proposed deadline, within assessment if possible or at 1st SA following FCP 2.1
Pan Pacific yellowfin, bigeye and albacore longline fishery	PO-ALB-N	n/a	n/a	2023	No	Condition timelines to be aligned with relevant proposed deadline, within assessment if possible or at 1st SA following FCP 2.1
AAFA and WFOA South Pacific albacore tuna	PO-ALB-S	n/a	n/a	2021	No	Condition timelines to be aligned with relevant proposed deadline, within assessment if possible or at 1st SA following FCP 2.1
Pan Pacific yellowfin, bigeye and albacore longline fishery	PO-ALB-S	n/a	n/a	2021	No	Condition timelines to be aligned with relevant proposed deadline, within assessment if possible or at 1st SA following FCP 2.1

Fishery name	Stock	P1 upgrade required?	P1 upgrade type	CAB proposal condition deadline	Part of variation request?	Action required
Pan Pacific yellowfin, bigeye and albacore longline fishery	WPO-BET	n/a	n/a	2021**	No	Condition timelines to be aligned with relevant proposed deadline, within assessment if possible or at 1st SA following FCP 2.1
SZLC CSFC & FZLC FSM EEZ Longline Yellowfin and Bigeye Tuna	WPO-BET	n/a	n/a	2021**	No	Condition timelines to be aligned with relevant proposed deadline, within assessment if possible or at 1st SA following FCP 2.1
Ishihara Marine Products albacore and skipjack pole and line fishery	WPO-SKJ	n/a	n/a	2021	No	Condition timelines to be aligned with relevant proposed deadline, within assessment if possible or at 1st SA following FCP 2.1
PT Citraraja Ampat, Sorong pole and line Skipjack and Yellowfin Tuna	WPO-SKJ	n/a	n/a	2021	No	Condition timelines to be aligned with relevant proposed deadline, within assessment if possible or at 1st SA following FCP 2.1
Tropical Pacific yellowfin and skipjack free-school purse seine fishery	WPO-SKJ	n/a	n/a	2021	No	Condition timelines to be aligned with relevant proposed deadline, within assessment if possible or at 1st SA following FCP 2.1
Pan Pacific yellowfin, bigeye and albacore longline fishery	WPO-YFT	n/a	n/a	2021	No	Condition timelines to be aligned with relevant proposed deadline, within assessment if possible or at 1st SA following FCP 2.1
PT Citraraja Ampat, Sorong pole and line Skipjack and Yellowfin Tuna	WPO-YFT	n/a	n/a	2021	No	Condition timelines to be aligned with relevant proposed deadline, within assessment if possible or at 1st SA following FCP 2.1
SZLC CSFC & FZLC FSM EEZ Longline Yellowfin and Bigeye Tuna	WPO-YFT	n/a	n/a	2021	No	Condition timelines to be aligned with relevant proposed deadline, within assessment if possible or at 1st SA following FCP 2.1
Tropical Pacific yellowfin and skipjack free-school purse seine fishery	WPO-YFT	n/a	n/a	2021	No	Condition timelines to be aligned with relevant proposed deadline, within assessment if possible or at 1st SA following FCP 2.1
Solomon Islands longline albacore and yellowfin tuna fishery	WPO-YFT	n/a	n/a	2021	No	Condition timelines to be aligned with relevant proposed deadline, within assessment if possible or at 1st SA following FCP 2.1

Fishery name	Stock	P1 upgrade required?	P1 upgrade type	CAB proposal condition deadline	Part of variation request?	Action required
Solomon Islands longline albacore and yellowfin tuna fishery	PO-ALB-S	n/a	n/a	2021	No	Condition timelines to be aligned with relevant proposed deadline, within assessment if possible or at 1st SA following FCP 2.1

* Reduced upgrade permitted if an assessment against v2.0 has been completed for another UoA on the same stock

** No date for WPO-BET included in CAB's proposal. This date is added following the logic of the variation request and in line with other WCPFC stock workplans

Appendix B

Principle 1 v2.0 assessment upgrade process

February 2019

Principle 1 v2.0 assessment upgrade process

Introduction

This document provides the process requirements CABs shall follow to upgrade Principle 1 assessments of tuna fisheries currently certified against v1.3 of the MSC Fisheries Standard.

This process is only applicable to the combined tuna fishery variation request, submitted 11 December 2018.

This process is adapted from FCP v2.1 7.27 and Annex PE - scope extensions. It is noted that the MSC has no expectation that CABs – if they choose to apply this process before the FCP v2.1 becomes effective - are obliged to adopt the FCP v2.1 more generally before such time that it is required to do so.

The MSC expects that Principle 1 assessment upgrades will be conducted at the next surveillance audit. These process requirements do not change the need for CABs to conform to surveillance audit requirements as per FCP v2.1 7.28.

1. Scope

1.1. The requirements of this annex shall apply only to Principle 1 assessment upgrade of tuna fisheries currently certified against v1.3 of the MSC Fisheries Standard (as per Appendix A of the MSC's variation response).

2. Assessment team

2.1. The team shall comprise of a team leader and a minimum of 1 additional team member, that meet the qualifications and competency requirements relevant to Principle 1, specifically that the team leader shall meet Table PC1; team members meet table PC2; and combined they meet sections 1 (Fish stock assessment), 2 (Fish stock biology / ecology) and 5 (Current knowledge of the country, language and local fishery context) of table PC3.

3. Announcement

3.1. The CAB shall use the 'MSC Surveillance Announcement Template', which shall be uploaded to the MSC database for publication on the MSC website, to notify stakeholders and the MSC of the CAB's intent to undertake a Principle 1 v2.0 assessment upgrade at the next surveillance audit.

3.2. The CAB shall include the following information in the announcement:

a. Reference to the variation request
b. Details of the on-site or off-site assessment (depending on the surveillance level of the fishery as per FCP 7.28), including the date and, where relevant, the location of the site visit.
c. Details of what will be assessed/reviewed during the audit

d. Details of reporting timelines with respect to audit timing and expected report publication
e. Details of the opportunities and input methods for stakeholders to participate during the on-site or off-site assessment.
    i. The details should make clear that the assessment team is available to meet with stakeholders in person or remotely.
f. Summaries of CVs of the team and team leader, including an explanation of how they meet the competency criteria in the GCR and Annex PC , as well as confirmation that the team has no conflicts of interest in relation to the fishery under assessment.

3.3. The CAB shall upload the Announcement to the MSC database for publication on the MSC website at least 30 days before the Principle 1 v2.0 assessment upgrade on site or offsite audit is carried out.

4. Assessment

4.1. The CAB shall conduct the Principle 1 v2.0 assessment upgrade at the next Surveillance Audit.

4.2. The CAB shall use one of the following assessment types:

a. On-site. The assessment involves face-to-face engagement with the client, conducting stakeholder interviews and a review of management and science in the fishery.
b. Off-site. The assessment involves engagement with the client, conducting stakeholder interviews and a review management and science in the fishery and is undertaken by the assessment team from a remote location.

4.3. The CAB shall determine whether the Principle 1 v2.0 assessment upgrade is conducted on-site or off-site depending on the existing surveillance level assigned to the fishery and the ability of the CAB to remotely verify information.

4.3.1. Where an off-site assessment is conducted, the CAB shall provide a rationale in the announcement of how clause 4.3 is met.

4.4. The team shall:

a. Conduct interviews to make sure that the team is aware of any concerns or information that stakeholders may have.
b. Allow private interviews with the team for stakeholders who request one.
c. Use any information provided in private in conformity with confidentiality requirements, see FCP v2.1 Section 4.3.

4.5. The CAB shall evaluate the assessment components using all requirements in MSC Fisheries Standard Annex SA2 following the process as described in FCP Section 7.17 and Section 7.18.

4.6. The CAB shall complete the Principle 1 v2.0 upgrade assessment in compliance with timelines as set out in FCP 7.20.1 and 7.22.1.

5. Reporting

5.1. If the stock has been assessed against FCR v2.0 Annex SA, the CAB shall follow 5.1.1 – 5.1.4.

5.1.1. The CAB shall produce a single report using the ‘MSC Reporting Template’ and follow procedures outlined in FCP Sections 7.19.1, 7.19.2, 7.19.6 to 7.19.10, 7.24.3 and 7.24.4 (exclusive of references to the Peer Review Draft Report and the Peer Review College).

5.1.2. Reporting shall include:

a. Sections 1 to 5 of the ‘MSC Reporting Template’, limited to Principle 1
b. Section 7.1 (limited to Principle 1) and Section 7.2 of the ‘MSC Reporting Template’
c. Section 8 of the ‘MSC Reporting Template’

5.1.3. Where appropriate, the CAB shall populate sections of the 'MSC Reporting Template' from the existing Public Certification Report.

5.1.4. The report, completed in accordance with 5.1.2, will be published as an Annex to the Surveillance Audit.

5.1.4.1. If the Principle 1 v2.0 upgrade assessment is conducted outside of a Surveillance Audit, the CAB shall upload the report to the MSC database for publication on the MSC website.

5.2. If the stock has not been assessed against FCR v2.0 Annex SA, the CAB shall follow 5.2.1 – 5.2.5

5.2.1. The CAB shall produce the following reports using the 'MSC Reporting Template' and follow procedures outlined in FCP Sections 7.19 to 7.23 and 7.24.1 to 7.24.4:

a. Client and Peer Review Draft Report.
b. Public Comment Draft Report.
c. Final Draft Report.
d. Public Certification Report.

5.2.2. Reporting shall include:

a. Sections 1 to 5 of the 'MSC Reporting Template', limited to Principle 1
b. Section 7.1 (limited to Principle 1) and Section 7.2 of the 'MSC Reporting Template'
c. Section 8 of the 'MSC Reporting Template'

5.2.3. Where appropriate, the CAB shall populate sections of the 'MSC Reporting Template' from the existing Public Certification Report.

5.2.4. The minimum number of peer reviewers for Principle 1 v2.0 assessment upgrade shall be 1.

5.2.5. All other requirements for peer review outlined in FCP Sections 7.14, 7.19.3-7.19.5 and 7.20.9 shall apply.

6. Certification

6.1. The CAB shall make a determination regarding the Principle 1 assessment upgrade outcome and notify stakeholders in the Final Draft Report.

6.2. If it determined that the scores from the Principle 1 assessment upgrade meet the requirements for certification, the CAB shall update the Fishery Certificate Statement and fishery certificate(s) in accordance to FCP v2.1 Section 7.24.6.3 and 7.25.3.

6.3. If the determination is that the fishery has not met the requirements for certification, the CAB shall report this in the Final Draft Report and Public Certification Report and shall make no changes to the existing certificate, which shall remain valid.

6.4. If the Principle 1 assessment upgrade results in continued certification, the CAB shall conduct a full Principle 1 assessment at re-assessment.

Table 1: Principle 1 v2.0 assessment upgrade – indicative timelines

Principle 1 assessment upgrade announcement	30 days
On-site or off-site visit (i.e. surveillance audit)	
Client & Peer Review	60 days
Public Comment Draft Report	30 days
Final Draft Report	15 days
Public Certification Report	
Total	**135 days (4.5 months)**