



UCSL United Certification Systems Limited

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Russian Crab GC Sea of Okhotsk crab trap

MSC Variation Request

1 Marine Stewardship Council variation request

Table X – Variation request

1	Date submitted to the MSC
	07 th October 2021
2	CAB
	UCSL United Certification Systems Limited
3	Fishery name and certificate number
	Russian Crab GC Sea of Okhotsk crab trap – in assessment
4	Lead auditor or program manager
	Steven Nelson
5	Request prepared by
	Tatiana Pitieva, UCSL program manager
6	Scheme requirement(s) for which variation requested
	FCP v2.2 - 7.16 / G7.16 Site Visit: Team Attendance March 2021 Derogation 3: Covid-19 Fishery and Chain of Custody Remote Auditing – Normative Requirements - 1.3.b. – Submit a variation request (as per GCR 4.12) to the MSC to conduct initial assessments remotely.
7	How many times has a variation for this requirement been accepted for the same assessment of the same fishery?
	This is the first variation request submitted for this fishery.

Table X – Variation justification

1 Proposed variation	
The CAB proposes that the site visit for this fishery be conducted remotely for the assessment team, as opposed to conducting an fully onsite visit in the Russian Federation.	
2 Additional time requested	
Original deadline date	N/A
Modified deadline date requested	N/A
Length of additional time requested	N/A
3 Justification	
<p>The updated MSC Covid-19 Pandemic Derogation (effective 28th March 2021) states that “initial assessments and audits that are to be completed without an on-site visit will require CABs to submit a variation request and risk assessment for approval” and that “If national or local Covid-19 restrictions prevent Conformity Assessment Bodies (CABs), assessors or certificate holders from carrying out on-site audits and assessments of already certified businesses, these may be undertaken remotely.”</p> <p>The justification for conducting a remote site visit for this assessment is as follows:</p> <p>Travel Restrictions: The fishery takes place in Kamchatka, Russia. The site visit is planned to be held in Vladivostok, Russia. At the present moment there are significant restrictions between the place of residence of the assessor (USA, Europe) and Russia. Planning of logistics through other means of travelling and countries will lead to extra expenses to the fishery client.</p> <p>According to the current regulation (Regulation of the Governor of the Primorsky region of 18.03.2020 No. 21-pg, clause 6 https://www.primorsky.ru/events/kadry-dlya-economiki/%D1%81%D0%B0%D0%B9%D1%82/21%20%D0%BF%D0%B3%20%D0%BE%D1%82%2020%20%D0%BC%D0%B0%D1%80%D1%82%D0%B0.pdf), the heads of the organizations (individual entrepreneurs) are instructed not to hold any events with the participation of foreign citizens and not to participate in such events. This state regulation directly precludes the onsite visit at this assessment.</p> <p>All team members for this assessment is based abroad. They have been selected as meeting the relevant competence and qualification requirements substitution of whom will not be organized promptly due to no currently available Russian residents meeting the same requirements at the same level.</p>	
4 Implications for assessment	
Remote audit activities will not have any implications for the assessment, including its timeline. Taking into account our CAB's experience with remote fishery assessments within the derogation period during which the active participation of the stakeholders was provided, there is confidence that a high level of stakeholder interaction will be provided here as well and the team will be able to collect all required information.	
5 Mitigation of the implications for assessment	
See Table 1 Risk assessment	
6 How many conditions does the fishery have and will their progress be affected (positive or negative)?	
This is the initial full assessment for this assessment, no conditions raised at this stage.	

7	What is the status of the current assessment or audit?
	The Announcement Comment Draft Report was published on 18 August 2021. The site visit is planned for 18-22 November 2021.
8	Further comments
	N/A
9	If applicable, additional information added after the MSC's request
	N/A

Table 1 - Risk assessment

Risk areas	Key risks	Mitigation plan
Sufficient information to enable an effective and robust fishery assessment process and comprehensive assessment against the MSC Fisheries Standard	Ability to verify information remotely	Low risk - the team will use different mechanisms to engage with the clients and stakeholders, such as Skype/Zoom calls, email and phone (where appropriate). The mechanisms are determined to be sufficient and effective in the circumstances of this fishery. Fishery reports and other documents are fully available to the team as they have been requested during the ACDR preparation. Such information as logbooks and other hard copy documents in Russian is available to be promptly transmitted electronically (scanned copies) to the team: assistance with interpretation of this information will be provided by an independent interpreter. As it's a large-scale fishery, information about it, including the management system, is widely known to the stakeholders via its website and therefore can be easily verified. The physical aspects of the fishery will be verified through the photo and video files made by the client.
	Ability to engage with stakeholders, deliver a robust stakeholder consultation process and conduct interviews with stakeholder.	Low risk – UCSL will organize the consultation process according to FCP v.2.2 4.2 in a timely manner and allowing different means of communication with the team. UCSL also has an effective internal procedure of stakeholder consultations in place, used by the teams in all assessments
	Ability to gather information and carry out stakeholder consultations if the Risk Based Framework (annex PF) is being used to assess data-deficient PIs.	No risk – no RBF to be used
	Availability of information	Low risk – during the preparation of the ACDR the team didn't reveal a large number of information gaps. The client has done a lot to gather all possible information in advance, 6 PIs preliminarily scored as 60-79.

	Ability to understand the context, scale, and intensity of the fishery operations.	Low risk – the team has a good understanding of the specified aspects of the fishery under assessment. The team leader researched the ACDR preparation materials for this fishery client well.
Sufficient communication capability to effectively plan, conduct interviews and facilitate information sharing as per IAF ID 4: 2018 .	Availability of information and communication technology (ICT).	Low risk – the team has available a wide range of ICT such as their PCs with required software, teleconference facilities allowing audio, video and data sharing. Video and audio during the opening and closing meetings will be recorded if agreed by all parties, taking into account security and confidentiality issues.
	Competency of assessment teams, auditees, and stakeholders in using ICT.	Low risk – the team, representatives of the CAB and the client has used Skype, Zoom and other ICT during internal communication and during other events, including remote assessments. No problems with using them identified or declared before. The CAB and the assessors understand the risks and opportunities of ICT used and its possible impact on the assessment duration. For this purpose the meetings have been split into a number of shorter sessions to make communication more effective.
	Ability to clearly exchange information between the assessment team, prospective fishery client and stakeholders and to be understood by all parties when parties speak different languages.	Low risk – the basic language of communication with the client and stakeholders will be Russian. During the site visit communication will be maintained by an independent interpreter, for discussion with another team members (English-Russian).
	Ability to schedule remote site visit activities at reasonable mutually convenient times when parties are located across different time zones.	Low risk – taking into account the different time zones of the places of location of the parties of this assessment (USA, Europe, Russia), the assessment activities have been planned in such a way to make it possible for all parties to participate 3-4 hours each assessment day. All participants have confirmed their availability for these periods.