



LRQA
Office 79 (Pure Offices)
4-5 Lochside Way
Edinburgh Park, EH12 9DT
United Kingdom

T +44 0800 092 0452
E fisheries-ca@lrqa.com

www.lrqa.com

LRQA

Finland Baltic herring & sprat
MSC Variation Request

1. Marine Stewardship Council variation request

Table 1: Variation request

1	Date submitted to the MSC
13 th January 2023 (amended 16 th January)	
2	CAB
LRQA	
3	Fishery name and certificate number
Finland Baltic herring & sprat (MSC-F-31377)	
4	Lead auditor or program manager
Gillian Irvine Jim Andrews	
5	Request prepared by
Gillian Irvine (LRQA) Conor Donnelly (GTC)	
6	Scheme requirement(s) for which variation requested
FCP v2.2, 7.28.23, “ <i>The CAB shall upload the Surveillance Report to the MSC database within 60 days of completing the audit for publication on the MSC website.</i> ”	
7	How many times has a variation against this requirement been accepted during this assessment or audit of this fishery?
0	

YOUR FUTURE. OUR FOCUS.

For more information on LRQA visit www.lrqa.com/entities

LRQA and any variants are trading names of LRQA Group Limited, its subsidiaries and affiliates.

Acoura Marine Limited trading as LRQA (Reg. no. SC313289).

Registered office: 50 Lothian Road, Festival Square, Edinburgh, EH3 9WJ. Registered in Scotland. A member of the LRQA group

Table 2 – Variation justification

1	Proposed variation	
<p>LRQA would like to seek a variation to the requirement to upload the surveillance report within 60 days of completing the audit. We would like extra time to enable us to complete harmonisation, finalise the report and upload it to the MSC database. This will also align us with the publish deadline of the Poland herring and sprat midwater trawl and gill net: Poland sprat midwater trawl component fishery. The original 60-day deadline is the 31st January 2023 and the proposed variation would extend the deadline by 44 days to the 16th March 2023.</p>		
2	Additional time requested	
Original deadline date		31 st January 2023
Modified deadline date requested		16 th March 2023
Number of additional days requested		44 days
3	Justification	
<p>The Variation Request (VR) is being made to allow additional time for harmonisation with overlapping fisheries to be completed. There are four overlapping fisheries targeting Baltic sprat; the fisheries, their CABs and the status of the certificates are set out below:</p> <ul style="list-style-type: none"> • This fishery – active. • Poland herring and sprat midwater trawl and gill net: Poland sprat midwater trawl component (GTC) – active. • Denmark Estonia Germany Sweden Baltic herring and sprat (LRQA) – active. • NZRO Gulf of Riga herring and sprat trawl fishery (Bureau Veritas, BV) – suspended. <p>We are in the process of undertaking the 4th surveillance audit of this fishery and have been undertaking harmonisation discussions (GTC, LRQA and BV) regarding the re-scoring of PI 1.1.1A for Baltic Sea sprat and whether the condition on this PI is met.</p> <p>If the score awarded for this PI remains below 80 or if this condition is not met at this surveillance audit, the fishery will be suspended (since there hasn't been "adequate progress" in terms of 7.4.2.b of the GCR). As a result of information received during this surveillance, we consider it is appropriate to re-score PI 1.1.1A and we have also re-scored PI 1.2.1, PI 1.2.2. We are still discussing the need for re-scoring PI 3.1.1 and 3.2.2. We have identified new conditions on the PIs 1.2.1 and 1.2.2.</p> <p>This harmonisation process has not concluded. There are a number of areas where we have different opinions, where we are seeking to build consensus and need more time to see if we can reach agreement. In particular, with regard to the re-scoring of PI 1.1.1A and, should re-scoring of PI 1.1.1A at 80 be agreed, to finalise drafting of conditions for the other PIs and to allow time for our clients to produce a CAP for the new binding conditions identified.</p> <p>We would note that time constraints have posed a particular challenge to completing harmonisation during this surveillance audit since we could not start harmonisation until the LRQA fisheries had completed the site visits for our fisheries in mid-December 2022 (a month after GTC's site visit had concluded) and then we also had office closures over the Christmas period when it was not possible to conduct harmonisation discussions. As such it has been challenging to complete harmonisation within the timelines required for surveillance report upload.</p> <p>There is another other procedural reason for this VR too. As a consequence of new conditions being identified which would require our client to produce a Client Action Plan (CAP) we were expecting to need to upload the surveillance report 90 days after the end of the site visit which would have been 2nd March 2023. However, although the harmonisation process has not yet concluded, it may be that we will not be able to agree re-scoring of PI 1.1.1A at</p>		

YOUR FUTURE. OUR FOCUS.

For more information on LRQA visit www.lrqa.com/entities

LRQA and any variants are trading names of LRQA Group Limited, its subsidiaries and affiliates.

Acoura Marine Limited trading as LRQA (Reg. no. SC313289).

Registered office: 50 Lothian Road, Festival Square, Edinburgh, EH3 9WJ. Registered in Scotland. A member of the LRQA group

80 which, as noted above, would result in the suspension of the active certificates and would mean all conditions become non-binding. As conditions are non-binding, there is no requirement for the client to produce a CAP and the 90-day deadline for upload of the report would no longer apply and the surveillance report should be uploaded by the 60-day deadline. This variation request would also address this potential risk.

4	Implications for assessment
<p>Acceptance of this VR would enable harmonisation discussions on the re-scoring of PI 1.1.1A (following new information received during our surveillance audit) to be completed. This is very important as it affects whether the active certificates will be suspended or can remain certified. As noted above there are a number of areas where we have different opinions, where we are seeking to build consensus and need more time to do that.</p> <p>Should we reach agreement on re-scoring at 80 then we could close the condition on PI 1.1.1A and this VR would also enable time for our client to produce a CAP for the new conditions identified and to enable us to verify with any other entities involved in delivering the CAP that it is achievable by the client and realistic within the proposed time frame.</p>	
5	Mitigation of the implications for assessment
<p>No mitigation is required if the variation request is granted. The VR will have a positive impact in ensuring there is sufficient time for careful consideration to be given to re-scoring of PI 1.1.1A. No significant negative impacts are identified from the relatively short delay in the publication of the report and, should re-scoring of PI 1.1.1A not be agreed, the suspension of the fisheries.</p>	
6	How many conditions does the fishery have?
24	
7	What is the status of the current assessment or audit?
Currently undergoing its 4 th surveillance	
8	Other relevant information
N/A	
9	If applicable, additional information added after the MSC's request

2. Template information and copyright

The Marine Stewardship Council's 'MSC Variation Request Form – Fisheries v1.1' and its content is copyright of "Marine Stewardship Council" - © "Marine Stewardship Council" 2022. All rights reserved.

The CAB shall delete Table 3.

YOUR FUTURE. OUR FOCUS.

For more information on LRQA visit www.lrqa.com/entities

LRQA and any variants are trading names of LRQA Group Limited, its subsidiaries and affiliates.

Acoura Marine Limited trading as LRQA (Reg. no. SC313289).

Registered office: 50 Lothian Road, Festival Square, Edinburgh, EH3 9WJ. Registered in Scotland. A member of the LRQA group

Table 3: Template version control

Version	Date of publication	Description of amendment
1.0	25 March 2020	Release alongside Fisheries Certification Process v2.2
1.1	26 October 2022	Release alongside Fisheries Certification Process v2.3 and v3.0

A controlled document list of MSC program documents is available on the MSC website (<https://www.msc.org/for-business/certification-bodies/supporting-documents>).

Marine Stewardship Council

Marine House

1 Snow Hill

London EC1A 2DH

United Kingdom

Phone: + 44 (0) 20 7246 8900

Fax: + 44 (0) 20 7246 8901

Email: standards@msc.org

YOUR FUTURE. OUR FOCUS.

For more information on LRQA visit www.lrqa.com/entities

LRQA and any variants are trading names of LRQA Group Limited, its subsidiaries and affiliates.

Acoura Marine Limited trading as LRQA (Reg. no. SC313289).

Registered office: 50 Lothian Road, Festival Square, Edinburgh, EH3 9WJ. Registered in Scotland. A member of the LRQA group