

SAI Global

ISF Norwegian & Icelandic herring trawl and seine

MSC Variation Request

1 Introduction

This form details the information SAI Global is required to submit to the MSC to enable the MSC to consider an application to vary from a clause or requirement in any of the MSC program documents.

Once a Variation Request has been submitted the MSC will consider that request and will usually respond within 14 days.

2 Marine Stewardship Council variation request

Table 1. Variation request.

1	Date submitted to MSC
	29 th July 2019
2	CAB
	SAI Global
3	Fishery name and certificate number or CoC certificate number
	ISF Norwegian & Icelandic herring trawl and seine – MSC-F-30021
4	Lead auditor or program manager
	Virginia Polonio (lead auditor)
5	Request prepared by
	Géraldine Criquet
6	Scheme requirement(s) for which variation requested
	FCR v.2.0 7.9.1 <i>The team shall carry out on-site visit assessment as planned.</i>
7	How many times has a variation for this requirement been accepted for the same assessment of the same fishery?
	0

Table 2. Variation justification.

1	Proposed variation	
	SAI Global proposes to conduct an additional site visit with two auditors on site (Virginia Polonio, lead auditor responsible for Traceability and P2; and Conor Donnelly, auditor responsible for Principle 3) and one auditor (Maciej Tomczak, auditor responsible for Principle 1) working off-site by supporting the auditor on-site via conference calls.	
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 fishery certificate has been transferred from Lloyd’s Register to SAI Global on 12th July 2019 at the early stage of the re-assessment process (i.e. after the initial site visit and before the client review of the Client Draft Report).</p> <p>SAI Global’s team is different from the initial assessment team with the exception of Maciej Tomczak who was part of Lloyd’s Register’s assessment as assessor responsible for Principle 1.</p> <p>MSC’s interpretation regarding Team members on-site for initial assessment audit in v.2.0 (FCR V.2.0 7.9.1) (please refer to section 3 of this VR) allows some members of the team to participate remotely in the audit via other means in the case that it would not affect the effectiveness and credibility of the audit.</p> <p>Justification for SAI Global’s request to conduct an additional site visit with the auditor responsible for Principle 1 participating remotely (via conference calls) is as follows:</p> <ol style="list-style-type: none">1) The auditor responsible for Principle 1 was part of the initial assessment team and has participated in the initial site visit. Therefore, he already conducted face-to-face stakeholders interviews to make sure that the team was aware of any concerns or information that stakeholders may have regarding Principle 1;2) SAI Global used its expert judgement and knowledge of Icelandic fisheries including small pelagic fisheries to determine that the fishery’s ability to provide information regarding Principle 1 remotely is high (G.7.23.4 Table G13)<ol style="list-style-type: none">a) There are ample opportunities and mechanisms to engage with client and stakeholders via conference calls and the mechanism are effective in the particular circumstances of the fishery. Therefore the ability to verify information from client and stakeholders ‘input remotely is high.b) Fishery reports and other documented evidences relevant for Principle 1 can be easily and transparently checked remotely due to such information being available publically. Therefore ability to verify information from fishery reports, government documents, stock assessment reports and or other relevant reports remotely is high.c) Information appropriate to determination of Principle 1 requirements is available to be transmitted electronically to auditors in a form that can be easily interpreted. Therefore, ability to verify information appropriate to determination of Principle 1 requirements remotely is high.d) There is a high level of transparency in management such that information on the fishery is widely and publically available or known to the wider group of stakeholders. Therefore ability to verify information provided on the fishery remotely is high.	

Table 2. Variation justification.

4	If a fishery assessment, implications for assessment
	If granted, this VR will allow SAI Global to conduct an additional site visit with the auditor responsible for Principle 1 supporting remotely (via conference calls) the lead auditor responsible for traceability and Principle 2 and the auditor responsibility for Principle 3 on-site. This does not affect the effectiveness and credibility of the re-assessment.
5	If a fishery assessment, mitigation of the implication for assessment
	As stated and demonstrated above, SAI Global did not identified any risk that would impact the effectiveness and credibility of the re-assessment.
6	If a fishery assessment, how many conditions does the fishery have and will their progress be affected (positive or negative)?
	SAI Global's assessment team will determine whether conditions should be raised following the team's formal scoring of the fishery.
7	What is the status of the current assessment?
	The fishery is currently under re-assessment. The Client Draft Report is expected to be sent to the client by end of September 2019.
8	Further comments
	N/A
9	If applicable, additional information added after MSC's request
	N/A

3 Relevant MSC Interpretations and clauses

MSC Interpretation

Relevant Interpretation 1	
Title:	Team members on-site for initial assessment audit in v.2.0 (FCR V.2.0 7.9.1)
Date:	Last published date is 30 th August 2018
Weblink:	https://mscportal.force.com/interpret/s/article/Team-members-on-site-for-initial-assessment-audit-in-v2-0-7-9-1-1527262011106
Question:	In the Version 2.0 fishery certification requirements for an initial assessment we are required to select a minimum team of two as per the requirements in 7.5. What remain unclear is whether the whole team is then required to be present in person at the site visit or not? The only reference to this is 7.9.1 "The team shall carry out the site visit as planned". You state in the Guidance G7.9.1 that other site visits can be completed without the full team. So does this mean that the whole team must complete one site visit but if you have more than this can they then be completed by some of the team?
Answer:	<p>It is the MSC's intent that all of the team would attend all of the meetings at the initial assessment site visit (see separate processes for determining who attends surveillance and re-assessment site visits in 7.23.4 and 7.24.8 respectively), but we have received and variation requests in the past for some team members to participate remotely in meetings. We accept or decline these on a case-by-case basis; based on whether having all team members go on site would cause unreasonable cost or inconvenience and whether allowing some members to participate in the audit via other means would affect the effectiveness and credibility of the audit.</p> <p>This latter point is often tied to the ability to verify information remotely –see Guidance G7.23.4 and Table G13 for surveillance audits. For example, if there are ample opportunities and mechanisms for communication with all stakeholders (e.g. videoconferencing, Skype) then the ability for the team members not present to participate and verify information remotely is high. If, however, means to communicate with the clients and stakeholders are absent, limited or inefficient and ineffective in providing information required for the assessment (e.g. carrying out a SICA with a stakeholder group with no means for some team members to participate actively in the discussion), then the ability to verify information is low and the MSC would be unlikely to grant a variation request for team members to participate remotely.</p> <p>In the case where multiple on-site visits are held, the Guidance G7.9.1 indicates that one or more team members could attend these. It would make sense for the expert(s) to attend these that are most relevant for the nature of the discussion (e.g. if on harvest control rules, you'd want to have the P1 expert attend). One example of an accepted variation was the Falkland Island toothfish assessment (Note: carried out on v1.3 so some of the language and references would be different), where getting all three team members to the Falkland Islands would be a significant cost to the client (you can see the actual variation request and the MSC's response under Stage 3 on this webpage). The variation request detailed how the assessment would not be adversely affected by some team members participating remotely, and it was granted with the following condition:</p> <p><i>The CAB's stakeholder notice should make clear that all members of the team are available to meet with stakeholders by virtual or other means, including at mutually convenient physical locations where it is shown that this would be necessary to effectively communicate key issues.</i></p>

Guidance to certification requirements

G7.23.4	Verification of information
Table G13	To assess fisheries against the verification of information criteria, CABs can create a list of information, information resources and aspects of the fishery that need to be reviewed. In each item, CABs can use Table G13 to determine the likelihood that they will be able to access the required information remotely and that they can confirm veracity of the information.

4 Template information and copyright

This document was drafted using the 'MSC Variation Request Form v3.1'. While amendments have been made to formatting in order to comply with SAI Global's corporate identity, SAI Global has ensured that content and structure follow that of the original template.

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Table 3. Template version control.

Version	Date of publication	Description of amendment
1.0	1 January 2011	Date of application
1.1	24 October 2011	Updated to include a confidential information section
1.2	10 January 2012	Updated to include more detailed instructions on confidential information section
1.3	14 January 2013	Updated in line with requirements in MSC Certification Requirements v1.3, including P2 to P1 'expedited audit'
2.0	08 October 2014	Updates in line with release of Fisheries Certification Requirements v2.0
2.1	04 October 2016	Updated contact information
3.0	17 December 2018	Release alongside Fisheries Certification Process v2.1
3.1	28 March 2019	Non-substantive changes to improve clarity and usability

A controlled document list of MSC program documents is available on the [MSC website](http://msc.org) (msc.org).

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