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# MRAG Americas, Inc.

## Great Salt Lake Brine Shrimp Fishery

### MSC Variation Request

**Table 1 – Variation request**

1	Date submitted to the MSC
	19 April 2022 (updated 22 April 2022)
2	CAB
	MRAG Americas, Inc.
3	Fishery name and certificate number
	Great Salt Lake brine shrimp fishery
4	Lead auditor or program manager
	Amanda Stern-Pirlot
5	Request prepared by
	Michealene Corlett
6	Scheme requirement(s) for which variation requested
	FCP 7.16.1
7	How many times has a variation for this requirement been accepted for the same assessment of the same fishery?

Zero

**Table 2 – Variation justification**

1	Proposed variation	
	MRAG Americas proposes to allow the assessment team to conduct the initial assessment audit remotely because fishery operations do not begin until October and the client would like to begin the certification process as soon as possible.	
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 Great Salt Lake brine shrimp fishery is open between October and February each year, and the client would like to begin the assessment process as soon as possible so as to potentially gain certification for use in the 2022-2023 season. With the fishery not in operation, the assessment team does not need to be onsite—in fact, most of the people involved in the fishery are also not in the area during the off season. Meetings with client representatives, management and interested stakeholders can easily occur over Zoom, and relevant evidence can also be provisioned remotely. If the certification is successful, the following year's surveillance audit will be done onsite with the full assessment team, while the fishery is open, and the facilities can be visited, and fishing operations observed.</p>	
4	Implications for assessment	
	<p>The implication for this assessment is that the team members will not be in-person during site-visit meetings for the initial assessment. We have determined that risks associated with not being onsite for the initial audit, particularly when the fishery is closed, are negligible. The advantage of a remote site visit is it will allow a more flexible meeting schedule for the stakeholders, fishery scientists and managers who require interviewing to be involved in the assessment, many of whom will also not be at a site near the fishery in the off season, and will enable the assessment process to progress, potentially allowing the fishery to use the certification (if successful) for the 2022-2023 season.</p>	
5	Mitigation of the implications for assessment	
	The ability to verify information remotely is high (low risk). Refer to the attached risk assessment.	
6	How many conditions does the fishery have and will their progress be affected (positive or negative)?	
	Zero	
7	What is the status of the current assessment or audit?	
	Preparing for announcement	
8	Further comments	

9	If applicable, additional information added after the MSC's request

Risk areas	Key risks	Ability to verify remotely
Sufficient information to enable an effective and robust fishery assessment process and comprehensive assessment against the MSC Fisheries Standard	Ability to verify information remotely	Fishery reports, government documents, stock assessment reports and other relevant reports can be easily and transparently checked remotely due to such information being publicly available on websites or are widely distributed and made publicly available to several stakeholders. These reports can be transmitted electronically, and veracity easily confirmed.
	Ability to engage with stakeholders, deliver a robust stakeholder consultation process and conduct interviews with stakeholders.	There are ample opportunities and mechanisms to engage with stakeholders including electronic forms of communication, such as videoconferencing, phone conferencing, email and phone. These mechanisms are effective in the particular circumstances of the fishery.
	Ability to gather information and carry out stakeholder consultations if the Risk Based Framework is being used to assess data-deficient Pis.	The Risk Based Framework is not being used to assess any Pis in this fishery.
	Availability of information	Fishery reports, government documents, stock assessment reports and other relevant reports that can be used to assess performance against the MSC Fisheries Standard are easily and transparently checked remotely, due to such information being available publicly, on websites or are widely distributed and made publicly available to several stakeholders. The reports can be transmitted electronically, and veracity easily confirmed.
	Ability to understand the context, scale, and intensity of the fishery operations.	Verification mechanisms such as videos and photos that are available on the client's website along with a description of the operation provided by the State of Utah, Division of Wildlife Resources website are available to be transmitted electronically to auditors in a form that can be easily interpreted. This is a very simple operation taking place on a

		lake were there is no other commercial fishing.
Sufficient communication capability to effectively plan, conduct interviews and facility information sharing as per IAF ID 4:2018.	Competency of assessment teams, auditees, and stakeholders in using ICT.	A 'Remote Assessment Form' is sent to all audit participants of a planned remote assessment to facilitate planning and to verify the competency of attendees' ability in using all available ICT. The assessment team is able to use multiple forms of communication to accommodate clients, fishery scientists, managers and interested stakeholders.
	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.	A 'Remote Assessment Form' is sent to all audit participants of a planned remote assessment to determine if a translator will be used. The form also denotes that the official language of the MSC is English. In this instance, the common language shared by all participants and documentation is English.
	Ability to schedule remote site visit activities at reasonable mutually convenient times when parties are located across different time zones.	A 'Remote Assessment Form' is sent to all audit participants of a planned remote assessment to verify the respective time zones of each participant. This will aid in planning a mutually convenient time for audit attendees. In this particular instance, attendees are local and there will be very little time difference, if any, from their respective locations.
<b>Risk areas</b>		<b>Ability to verify remotely</b>
Client and stakeholder input		There are ample opportunities and mechanisms to engage with clients and stakeholders including electronic forms of communication, such as videoconferencing, phone conferencing, email and phone. These mechanisms are effective in the particular circumstances of the fishery. There are already established relationships between the client group and the active environmental NGOs in the area, as well as fishery managers, processors and others.
Fishery reports, government documents, stock assessment reports and/or other relevant reports		Fishery reports and other documented evidence that can be used to assess performance against the MSC Fisheries Standard are easily and transparently checked remotely, due to such information being available publicly, on websites or are widely distributed and made publicly available to several stakeholders. The reports can be transmitted electronically, and veracity easily confirmed.
Information appropriate to determination of Principle 1 and Principle 2 information requirements		Verification mechanisms such as videos and photos that are available on the client's website along with a description of the operation provided by the State of Utah, Division of Wildlife

	Resources website are available to be transmitted electronically to auditors in a form that can be easily interpreted. This is a very simple operation taking place on a lake where there is no other commercial fishing.
Transparency of the management system	There is a high level of transparency in management, where information on a fishery is widely and publicly available or known to the wider group of stakeholders. Information provided can be easily verified.
Vessels, gear or other physical aspects of the fishery	The assessment does not require investigation of the physical aspects of the fishery, though if the assessment is successful, this will occur with the full team during the first surveillance audit when the fishery is open.