



UCSL United Certification Systems Limited
1 Anastasi Shoukri Street, Pamelva Court,
Office 003, 3035 Limassol, Cyprus
Mobile phone: +35797649035
Email: a.khoruzhiy@ucsl.eu
Website: <https://ucsl.eu>

UCSL United Certification Systems Limited

Barents Sea cod, haddock and saithe

MSC Variation Request

Marine Stewardship Council variation request

Table 1 – Variation request

1	Date submitted to the MSC
	29.08.2024
2	CAB
	UCSL United Certification Systems Limited
3	Fishery name and certificate number
	Barents Sea cod, haddock and saithe
4	Lead auditor or program manager
	Alexey Khoruzhiy
5	Request prepared by
	Alexey Khoruzhiy
6	Scheme requirement(s) for which variation requested
	<p>MSC Fisheries Certification Process v2.3:</p> <p>7.5.11 The CAB shall determine whether there are catches of non-target (Principle 2) stock(s) that are inseparable or practicably inseparable (IPI) from target (Principle 1) stock(s).</p> <p>7.5.11.1 The CAB shall only recognise stock(s) as being an IPI stock where the inseparability arises because either:</p> <p>a) The non-target catch is practicably indistinguishable during normal fishing operations (i.e. the catch is from a stock of the same species or a closely related species), or</p> <p>b) When distinguishable, it is not commercially feasible to separate due to the practical operation of the UoA that would require significant modification to existing harvesting and processing methods.</p> <p>And:</p> <p>c) The total combined proportion of catches from the IPI stock(s) does not exceed 15% by weight of the total combined catches of target and IPI stock(s) for the UoA.</p> <p>d) The IPI stock(s) are not endangered, threatened or protected (ETP) species.</p> <p>e) The IPI stock(s) are not certified separately</p> <p>7.5.12 If the CAB identifies IPI stock(s) as per 7.5.11.1, the CAB shall:</p> <p>a. Apply Annex PA.</p> <p>b. Upload an announcement to the MSC database for publication on the MSC website, using the 'MSC IPI Announcement Template', to inform stakeholders and the MSC of the identification of IPI stock(s).</p> <p>7.5.13 In the 'MSC IPI Announcement Template', the CAB shall follow either 7.5.13.1 or 7.5.13.2</p>
7	How many times has a variation for this requirement been accepted for the same assessment of the same fishery?
	NA

Table 2 – Variation justification

1	Proposed variation														
	<ul style="list-style-type: none">- Please describe how the CAB proposes to vary from the requirement including, where required, any original deadline date, the length of additional time requested and the exact modified deadline date.														
	<p>UCSL proposes a variation from the requirement which prevents separately certified stocks from being treated as “Inseparable or practicably inseparable” (“IPI”) catches.</p> <p>Northern Norwegian coastal cod (NNCC) is currently certified under the MSC Standard across several overlapping fisheries (see further details in Justification section below). However, due to the overall P1 score falling below 80, this NNCC stock is set to be suspended. Since NNCC and Northeast Arctic cod (NEAC) cannot be practically separated onboard UoA vessels, suspending NNCC would also lead to the suspension of NEAC.</p> <p>To avoid this outcome, UCSL requests a variation from the requirement of 7.5.11.1.e allowing a small quantity of NNCC (up to 5% of the total catch) to be included as an IPI catch in the MSC-certified NEAC landed by vessels in this fishery.</p> <p>The results of the expedited audit will be incorporated into the 2nd SA report.</p>														
2	Additional time requested														
	Original deadline date	June 7, 2024													
	Modified deadline date requested	1 st October 2024 (extended upon VR accepted)													
	Length of additional time requested	NA													
3	Justification														
	<ul style="list-style-type: none">- Please explain in detail why the variation is requested and why the change is necessary. This helps the MSC decide whether the variation request should be granted.														
	<p>In mid-January, during the harmonisation discussion on the Northern Norwegian Coastal Cod (NNCC) stock status, new information emerged regarding for FISF Faroe Islands East Arctic cod, haddock and saithe in relation to PI 1.1.1-1.2.4. This overlapping fishery rescored both PIs as SG 60, which would bring the average Principle 1 score below 80. Consequently, the entire UoA would fail the scoring and be subject to suspension or withdrawal.</p> <p>There are 13 fisheries with NEAC as a P1 species, and with the new stock definition, twelve of these fisheries would be affected. However, only four currently have NNCC as a P1 species (either as a P1 element or a separate UoA, see green rows in Table 3).</p> <p>Following the latest harmonization meeting held on 3rd July, the CABs agreed on a unified approach for the Barents Sea NEA cod fisheries. This approach will involve revising the NNCC current stock status across all overlapping fisheries, considering it as an IPI stock within the bycatch primary species, and calculating its share of the total catch over the last five years. As a result, Annex PA will be applied accordingly.</p> <p>Table 3. Overlapping Units of Assessment for NEA and NNC cod</p> <table><tr><th>Fishery</th><th>CAB</th><th>Status</th><th>NNCC designation as of June 2024</th></tr><tr><td>AGARBA Spain Barents Sea cod</td><td>Bureau Veritas</td><td>Recertified March 2024</td><td>Element within UoA</td></tr><tr><td>North-West Fishing Consortium Norwegian & Barents Seas cod, haddock & saithe</td><td>UCSL</td><td>Recertified November 2020</td><td>Not designated yet</td></tr></table>			Fishery	CAB	Status	NNCC designation as of June 2024	AGARBA Spain Barents Sea cod	Bureau Veritas	Recertified March 2024	Element within UoA	North-West Fishing Consortium Norwegian & Barents Seas cod, haddock & saithe	UCSL	Recertified November 2020	Not designated yet
Fishery	CAB	Status	NNCC designation as of June 2024												
AGARBA Spain Barents Sea cod	Bureau Veritas	Recertified March 2024	Element within UoA												
North-West Fishing Consortium Norwegian & Barents Seas cod, haddock & saithe	UCSL	Recertified November 2020	Not designated yet												

Barents Sea cod, haddock and saithe	UCSL	Recertified April 2022	Not designated yet
Estonia North East Arctic cold water prawn and cod	DNV	Recertified May 2024	Not designated yet
FISF Faroe Islands and Iceland North East Arctic cod, haddock and saithe	DNV	Recertified May 2023	Not designated yet
FIUN Barents & Norwegian Seas cod and haddock	UCSL	Re-assessment ongoing	Not designated yet
Greenland cod, haddock and saithe trawl	LRQA	Recertified April 2019	IPI with publication of SA report July 2023
Murmanseld 2 Barents Sea cod and haddock	UCSL	Certified March 2020	Not designated yet
Norway North East Arctic cod offshore (>12nm)	DNV	certified November 2023	separate UoA
Oceanprom Barents Sea cod and haddock	UCSL	Suspended April 2024	NA
UK Fisheries/DFFU/Doggerbank Northeast Arctic cod, haddock, saithe	Control Union	Recertified September 2022	Element within UoA
«GELA» Ltd North East Arctic cod, haddock and saithe	UCSL	Certified August 2022	Not designated yet
Compagnie des Pêches de St Malo and Euronor Northeast Arctic cod and haddock fishery	Control Union	Recertified September 2022	Element within UoA

However, since the harmonisation activities are still ongoing, UCSL cannot provide the final report results at the time. The harmonisation outcomes will be incorporated into an expedited and surveillance audit report. This report will include the revised NNCC scores along with the rationales and calculations of NNCC share as an IPI stock.

4 Implications for assessment

- Please include any impacts on the assessment/certificate if the request is accepted referencing any other requirements which may be affected, and the risks these implications could have.
- e.g. Timeline delays, stakeholder input.

If the VR is accepted, UCSL, in cooperation with all involved CABs and Principle 1 & 2 experts, will adopt a unified approach regarding the catches of the NNCC stock in the North East Atlantic cod fishery. Based on preliminary results of calculations, NNCC's share as an IPI stock may constitute up to 5% of the total catch per fishing season.

Allowing the NNCC stock to be designated as an IPI would result in the following:

1. NEAC maintaining its certification.
2. Up to 5% of the NNCC stock being sold under the new UoC definition.
3. NNCC being scored under Principle 2 as a Primary minor species.
4. A relevant condition being opened for all fisheries with NNCC as a Primary minor species, subject to harmonisation with other overlapping fisheries.

5 Mitigation of the implications for assessment

- Please include information how risks of the implications for the assessment that have been identified under the previous question are proposed to be mitigated by the CAB.

N/a

6 How many conditions does the fishery have and will their progress be affected (positive or negative)?

	The fishery currently has no conditions.
7	What is the status of the current assessment or audit?
	<ul style="list-style-type: none"> - Please include the latest version and timing of the report that has been prepared, and an indication when the next report is expected (e.g. the Client and Peer Review Draft Report has been sent to the client and the peer reviewers on 7 June 2018. The Public Comment Draft Report is expected to be ready on 1 September 2018).
	The 2 nd Surveillance & expedited audit finished on Apr 10, 2024, but the report is still in preparation.
8	Further comments
	<ul style="list-style-type: none"> - Please include any further relevant information.
	N/a
9	If applicable, additional information added after the MSC's request
	N/a

1 Template information and copyright

This document was drafted using the 'MSC Variation Request Form – Fisheries v1.0'.

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Template version control

Version	Date of publication	Description of amendment
1.0	25 March 2020	Release alongside Fisheries Certification Process v2.2

A controlled document list of MSC program documents is available on the MSC website (msc.org).

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