



Jim Andrews
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Sent by email

Date: 19/11/2018

Subject: Request for variation to the MSC Certification Requirement v2.0 FCR-7.23.18 for PFA & SPSP North Sea Herring

Dear Jim Andrews,

I write with reference to your submission on 30/10/2018 of a request for variation to the MSC Certification Requirement (CR) to allow:

Lloyds Register proposes that the surveillance report (review of information) will be submitted by the 17th December 2018. This date is 90 days after the client organisations received the final condition and milestones.

As you are aware, the CR procedures relating to v2.0 FCR-7.23.18 state:

This Surveillance Report shall be forwarded to the MSC within 60 days of completing the audit, for publication on the MSC website

These are integral to ensuring all MSC accredited Conformity Assessment Bodies operate in a consistent and transparent manner. The MSC intends that these requirements be met across all fisheries and CoC certificate holders, except in exceptional, well-justified circumstances, as part of the MSC programme.

MSC notes the factors presented supporting your request, including:

- A Principle 1 harmonisation meeting between CABs (Lloyds Register, CU Pesca and DNV GL) took place on the 12th September 2018 it led to a condition being raised against Performance Indicator 1.2.2c (Harvest Control Rules).
- CABs harmonised the condition and milestones for the six MSC certified North Sea herring fisheries.
- One extension to the surveillance audit timescales have previously requested for this fishery to allow for these harmonisation discussions to take place.
- The additional time now requested is for fishery client to coordinate their response with those of other client fisheries and allow for harmonised CAB review of the CAP.
- This 3rd variation request results in a 114 day extension to the 60-day deadline to submit the surveillance report.

Given the rationale provided, the MSC is willing to grant a variation to the CR in this case subject to the following conditions:

- The CAB can confirm that it is not aware at this time of any factor (related to either fishery status, or performance against conditions) that could result in the fishery no longer being in compliance with the MSC Fisheries Standard.
- The surveillance report will be published on or before the 17 december 2018.
- Stakeholders are informed.



If you have any questions regarding this response, please do not hesitate to contact the relevant Fisheries Assessment Manager for this fishery.

Marine Stewardship Council

cc: Accreditation Services International