



Henry Ernst
Control Union UK
56 High Street
Lymington
United Kingdom
SO41 9AH

Sent by email

Date: 08/04/2022

Subject: Request for variation to the MSC Certification Requirement v2.2 FCP-7.30.1 for Compagnie des Pêches Saint Malo and Euronor cod and haddock

Dear Henry Ernst,

I write with reference to your submission on 30/03/2022 of a request for variation to the MSC Certification Requirement (CR) to allow:

According to FCP 7.30.1, the reassessment of this fishery must be announced no later than the 15th July 2022. CU UK requests to extend this deadline by 30 days, to the 14th August 2022. Our original timeline to achieve this deadline is shown below.

- Team member inputs expected ACDR: Mid May
- Submission of ACDR to client (allowing 3/4 weeks for client review – extra time allocated here for french client representatives to have more time with the English report): Mid June
- Team to review client comments: Complete by 10th July
- CU to review (2 days): Complete by 12th July 2022
- CU to approve (allow 2 days): the ACDR Complete by 14th July 2022
- Announcement: 15th July 2022

However, we are concerned about meeting this deadline and we are requesting a 30-day extension on uploading the ACDR. The current ACDR deadline is 15th July 2022. CU UK will submit the ACDR report sooner than the requested revised deadline, if this is possible.

As you are aware, the CR procedures relating to v2.2 FCP-7.30.1 state:

The CAB shall announce the reassessment of a certified fishery no later than 90 days after the 4th anniversary of the existing certificate

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:

- The re-assessment cycle has been delayed due to discussions of potentially merging certificates between the client groups covered in these certificates and other MSC client groups of another certificate targeting the same stocks. The discussions did not reach an agreement due to discrepancies in timelines between the two assessments, resulting in a slight delay in this fishery re-assessment process.
- The delay in the process also affected assessor availability to work on the assessment.
- Given the above, Control Union (UK) Limited is concerned about meeting the original timeline set up for 15 July 2022 and requests a 30-day extension on submitting ACDR.

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 shall inform the client that a delay to the reassessment announcement may result in the certificate



expiring before the reassessment is complete and that the CAB and client cannot request a certificate extension unless there are extenuating circumstances that are outside the control of the client and CAB.

- Extended deadline is 14 August 2022.
- A stakeholder announcement shall be uploaded to Ecert for publication on the MSC website to inform stakeholders of the delay to the announcement of the reassessment.

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: Assurance Services International