



Bureau Veritas Certification Holding SAS
LFPO pelagic trawl sprat (*Sprattus sprattus*)
fishery
MSC Variation Request

Table 1 – Variation request

1	Date submitted to the MSC
	12 th of January 2021
2	CAB
	Bureau Veritas Certification Holding SAS
3	Fishery name and certificate number
	LFPO pelagic trawl sprat (<i>Sprattus sprattus</i>) fishery (MSC-F-31308)
4	Lead auditor or program manager
	Program manager – Macarena García
5	Request prepared by
	Lead auditor – Gemma Quílez This Variation Request has been prepared in consultation with the CABs for overlapping fisheries (LR and SAI Global) to ensure a harmonised approach in accordance with FCP v2.2 Annex PB.
6	Scheme requirement(s) for which variation requested
	MSC FCP v2.2 7.18.1.2 and 7.18.1.3 MSC Standard v2.01 SA2.3.1
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						
	<p>Bureau Veritas therefore seek the following variations from the MSC for their respective certified fisheries as required under this interpretation:</p> <ul style="list-style-type: none"> a) MSC Standard v2.01 SA2.3.1 – A variation is requested to derogate from the requirement to score PI1.1.2 when PI1.1.1A scores less than 80 [instead, PI1.1.2 will not be scored for a year, in line with SA2.3.2]. b) FCP v2.2 7.18.1.2 – A variation is requested to derogate from the requirement to draft a condition in the narrative and metric form of PI1.1.1A [the narrative and metric form will instead follow PI 1.1.2] c) FCP v2.2 7.18.1.3 – A variation is requested to derogate from the requirement for the condition to result in improved performance to the 80 level within a period set by the CAB [instead the condition will simply require that a rebuilding plan that specifies recovery within an measurable timeframe is in place within a year, which may or may not meet the SG80 requirements at this point]. 						
2	Additional time requested						
	<table border="1"> <tr> <td>Original deadline date</td><td>N/A</td></tr> <tr> <td>Modified deadline date requested</td><td>N/A</td></tr> <tr> <td>Length of additional time requested</td><td>N/A</td></tr> </table>	Original deadline date	N/A	Modified deadline date requested	N/A	Length of additional time requested	N/A
Original deadline date	N/A						
Modified deadline date requested	N/A						
Length of additional time requested	N/A						
3	Justification						
	<p>The status of the Baltic sprat stock has been rescored against PI1.1.1A in response to the most recent ICES advice. There have been lengthy and detailed harmonization discussions between CABs about the appropriate scoring in response to this advice. The conclusion is that the Baltic sprat stock now scores 70 against PI1.1.1A and that PI1.1.2 (stock rebuilding) should thus be scored.</p> <p>The Baltic Sea Multi Annual Plan (MAP) (EU Regulation 2016/1139 as amended) sets out a rebuilding plan in Article 5 (safeguards). The CABs have concluded that the rebuilding plan set out in Article 5 of the MAP contains most, but not all, of the key elements that would be required to meet the requirements of PI 1.1.2.</p> <p>The MAP does not specify a rebuilding timeframe although it states that measures to ensure rapid recovery should be put in place; and nor is it possible to infer a timeframe from simulations of stock recovery. This is because the most recent ICES advice only presents short-term projections for the stock (covering the next 2 years). However, in the absence of an estimate of B_0 it cannot be determined with certainty whether this level of recovery would meet the “SG80” requirements of PI 1.1.1A or if further recovery may be necessary.</p> <p>Overall, therefore, it is considered that the harvest strategy does not contain a rebuilding plan that specifies a timeframe for recovery.</p> <p>Because this fishery is already certified, the CAB is required to respond in accordance with SA2.3.2 with regard to scoring the stock rebuilding Performance Indicators (PI1.1.2) and the corresponding MSC Interpretation here: https://mscportal.force.com/interpret/s/article/Scoring-the-rebuilding-Performance-Indicator-during-the-certification-cycle. In accordance with this interpretation, it has been determined that in the absence of rebuilding timeframes it is not appropriate to score PI1.1.2 at present, and that a condition should be raised for PI1.1.1A which requires, <i>inter alia</i>, that a rebuilding plan is in place within a year.</p> <p>This outcome has been discussed and agreed with all of the CABs responsible for MSC-certified fisheries for this stock.</p> <p>Bureau Veritas therefore seek the following variations from the MSC for their respective certified fisheries as required under this interpretation:</p>						

	<p>a) MSC Standard v2.01 SA2.3.1 – A variation is requested to derogate from the requirement to score PI1.1.2 when PI1.1.1A scores less than 80 [instead, PI1.1.2 will not be scored for a year, in line with SA2.3.2].</p> <p>b) FCP v2.2 7.18.1.2 – A variation is requested to derogate from the requirement to draft a condition in the narrative and metric form of PI1.1.1A [the narrative and metric form will instead follow PI 1.1.2]</p> <p>c) FCP v2.2 7.18.1.3 – A variation is requested to derogate from the requirement for the condition to result in improved performance to the 80 level within a period set by the CAB [instead the condition will simply require that a rebuilding plan that specifies recovery within an measurable timeframe is in place within a year, which may or may not meet the SG80 requirements at this point].</p>																		
4	Implications for assessment																		
	Condition timelines will need to be harmonised across CABs (see section 5 below).																		
5	Mitigation of the implications for assessment																		
	<p>Timelines for all fisheries affected have been evaluated and condition timelines have been harmonised. Please see below table.</p> <table><tr><th></th><th>NZRO Gulf of Riga Herring Sprat (BV)</th><th>LFPO pelagic trawl Sprat (BV)</th><th>DDES Herring Sprat (LR)</th><th>Finland Baltic Herring Sprat (LR)</th><th>Polish Herring Sprat (SAI Global)</th></tr><tr><td>Condition raised</td><td>SA 1 (June 2021)</td><td>SA 4 (June 2021)</td><td>SA 1 (June 2021)</td><td>SA 2 (concluded Feb 2021)</td><td>FA (concluded June 2021)</td></tr><tr><td>Condition to be closed by</td><td>SA 2 (June 2022)</td><td>RA (June 2022)</td><td>SA 2 (June 2022)</td><td>SA 4 (June 2022)*</td><td>SA 1 (June 2022)</td></tr></table>		NZRO Gulf of Riga Herring Sprat (BV)	LFPO pelagic trawl Sprat (BV)	DDES Herring Sprat (LR)	Finland Baltic Herring Sprat (LR)	Polish Herring Sprat (SAI Global)	Condition raised	SA 1 (June 2021)	SA 4 (June 2021)	SA 1 (June 2021)	SA 2 (concluded Feb 2021)	FA (concluded June 2021)	Condition to be closed by	SA 2 (June 2022)	RA (June 2022)	SA 2 (June 2022)	SA 4 (June 2022)*	SA 1 (June 2022)
	NZRO Gulf of Riga Herring Sprat (BV)	LFPO pelagic trawl Sprat (BV)	DDES Herring Sprat (LR)	Finland Baltic Herring Sprat (LR)	Polish Herring Sprat (SAI Global)														
Condition raised	SA 1 (June 2021)	SA 4 (June 2021)	SA 1 (June 2021)	SA 2 (concluded Feb 2021)	FA (concluded June 2021)														
Condition to be closed by	SA 2 (June 2022)	RA (June 2022)	SA 2 (June 2022)	SA 4 (June 2022)*	SA 1 (June 2022)														
6	How many conditions does the fishery have and will their progress be affected (positive or negative)?																		
	2 conditions in total, including the new one raised on PI 1.1.1A. Progress against existing condition will not be affected.																		
7	What is the status of the current assessment or audit?																		
	Due to the MSC COVID19 derogation, the certificate of the fishery was extended 6 months, therefore, the current fishery anniversary is the 21 st of November 2021. Considering that the client is same as the NZRO Gulf of Riga Herring Sprat fishery both site visits will be coordinated to be carried out at the same time. Following the FCP V2.2 7.28.8.1, the fourth Surveillance audit will take place in June 2021.																		
8	Further comments																		
9	If applicable, additional information added after the MSC's request																		