

**Control Union (UK) Limited**

**Micronesia Skipjack, Yellowfin and Bigeye Tuna Purse  
Seine Fishery**

**MSC Variation Request**

# 1 Marine Stewardship Council variation request

Table 1 – Variation request

<b>1</b>	<b>Date submitted to MSC</b>
	22 <sup>nd</sup> February 2021
<b>2</b>	<b>CAB</b>
	Control Union (UK) Limited
<b>3</b>	<b>Fishery name and certificate number</b>
	Micronesia Skipjack, Yellowfin and Bigeye Tuna Purse Seine Fishery (no certificate number)
<b>4</b>	<b>Lead auditor or program manager</b>
	Chrissie Sieben (Team Leader); Beverley O’Kane (Project Manager)
<b>5</b>	<b>Request prepared by</b>
	Chrissie Sieben, Beverley O’Kane
<b>6</b>	<b>Scheme requirement(s) for which variation requested</b>
	FCP v2.1: <ul style="list-style-type: none"> <li>7.9.1.1 The CAB shall confirm that systems allow the fishery client to trace back to the UoC any fish or fish products sold as MSC certified;</li> <li>7.9.1.2 The CAB shall confirm that the fishery client maintains appropriate records to demonstrate the traceability back to their UoCs of certified fish or fish products.</li> </ul>
<b>7</b>	<b>How many times has a variation for this requirement been accepted for the same assessment of the same fishery?</b>
	None

**Table 2 – Variation justification**

<b>1</b>	<b>Proposed variation</b>											
	<p>This variation request relates to the following clauses from FCP v2.1:</p> <ul style="list-style-type: none"> <li>7.9.1.1 The CAB shall confirm that systems allow the fishery client to trace back to the UoC any fish or fish products sold as MSC certified;</li> <li>7.9.1.2 The CAB shall confirm that the fishery client maintains appropriate records to demonstrate the traceability back to their UoCs of certified fish or fish products.</li> </ul> <p>CU (UK) proposes that for the Micronesia Skipjack, Yellowfin and Bigeye Tuna Purse Seine Fishery, the systems allow the fishery client to trace product back to the certified fishery, rather than individual UoCs.</p>											
<b>2</b>	<b>Additional time requested</b>											
	<b>Original deadline date</b>	N/A										
	<b>Modified deadline date requested</b>	N/A										
	<b>Length of additional time requested</b>	N/A										
<b>3</b>	<b>Justification</b>											
	<p>The Micronesia Skipjack, Yellowfin and Bigeye Tuna Purse Seine fishery is currently undergoing initial assessment, in accordance with FCP v2.1. Under FCP v.2.1, fishery clients are required to ensure traceability back to the UoC, based on the following clauses:</p> <ul style="list-style-type: none"> <li>FCP v2.1 Clause 7.9.1.1: The CAB shall confirm that systems allow the fishery client to trace back to the UoC any fish or fish products sold as MSC certified;</li> <li>FCP v2.1 Clause 7.9.1.2: The CAB shall confirm that the fishery client maintains appropriate records to demonstrate the traceability back to their UoCs of certified fish or fish products.</li> </ul> <p>The Unit of Assessment is as follows:</p> <table border="1"> <tr> <td><b>Species and stock</b></td> <td>UoAs 1, 2: Western Central Pacific skipjack UoAs 3, 4: Western Central Pacific yellowfin UoAs 5, 6: Western Central Pacific bigeye</td> </tr> <tr> <td><b>Geographical range of fishery</b></td> <td>FAO Area 71/77: Exclusive Economic Zone of the Federated States of Micronesia (FSM) and WCPFC High Seas</td> </tr> <tr> <td><b>Harvest method / gear</b></td> <td>UoAs 1, 3, 5: Purse seine unassociated sets (also referred to as sets on free-swimming schools – FSC)  UoAs 2, 4, 6: Purse seine sets associated with drifting floating objects, including natural floating objects and drifting fish aggregating devices</td> </tr> <tr> <td><b>Client group</b></td> <td>Vessels owned and/or managed by Liancheng Overseas Fishery (FSM) Co. Ltd. (FZLC), Caroline Fisheries Corporation (CFC) and Da Yang Seafood (DYS), fishing for Western Central Pacific skipjack, yellowfin and bigeye with purse seine (on free-school and FAD sets) in the FSM EEZ and WCPFC High Seas.</td> </tr> <tr> <td><b>Other eligible fishers</b></td> <td>The client group is willing to share the MSC fisheries certificate with other eligible companies. To be eligible, a company must own and manage tuna</td> </tr> </table>		<b>Species and stock</b>	UoAs 1, 2: Western Central Pacific skipjack UoAs 3, 4: Western Central Pacific yellowfin UoAs 5, 6: Western Central Pacific bigeye	<b>Geographical range of fishery</b>	FAO Area 71/77: Exclusive Economic Zone of the Federated States of Micronesia (FSM) and WCPFC High Seas	<b>Harvest method / gear</b>	UoAs 1, 3, 5: Purse seine unassociated sets (also referred to as sets on free-swimming schools – FSC)  UoAs 2, 4, 6: Purse seine sets associated with drifting floating objects, including natural floating objects and drifting fish aggregating devices	<b>Client group</b>	Vessels owned and/or managed by Liancheng Overseas Fishery (FSM) Co. Ltd. (FZLC), Caroline Fisheries Corporation (CFC) and Da Yang Seafood (DYS), fishing for Western Central Pacific skipjack, yellowfin and bigeye with purse seine (on free-school and FAD sets) in the FSM EEZ and WCPFC High Seas.	<b>Other eligible fishers</b>	The client group is willing to share the MSC fisheries certificate with other eligible companies. To be eligible, a company must own and manage tuna
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		<p>purse seine vessels that are licensed to fish in the FSM EEZ and are authorized to fish on the high seas of the WCPFC Convention Area; employ fishing practices, gear designs and traceability procedures commensurate with those of the vessels covered by the certificate; and conform to the target species and stocks, geographical range of the fishery and harvest method as described by the Units of Assessment</p>	
	<p>Applying these traceability clauses to this fishery would therefore require separation of catches according to set type (associated vs unassociated) aboard the vessels and would present significant implications for the client's operations. Currently, a vessel fish tank may contain fish from both associated and unassociated sets, thus containing fish from different UoAs/UoCs. Assuming that all UoCs within this fishery become certified (pending a successful outcome of this assessment) and remain in conformity with the MSC standard, CU (UK) proposes that the clients for this fishery trace catch back to the certified fishery level, rather than the UoC level.</p>		
<b>4</b>	<b>Implications for assessment</b>		
	<p>The variation requested is unlikely to present implications for the current assessment, as all UoAs are currently under assessment and the traceability assessment aims to determine the risk of mixing certified and non-certified product. Implications arise upon certification of the fishery: if one or multiple UoCs fail, or become suspended, the eligibility of the whole fishery to enter the supply chain as MSC certified product would be impacted and the client's traceability systems would have to be re-assessed to ensure no mixing can occur between certified and non-certified catch. If mixing could not be prevented, none of the fish would be able to access supply chains using MSC certification.</p>		
<b>5</b>	<b>Mitigation of the implication for assessment</b>		
	<ul style="list-style-type: none"> <li>Where a UoC becomes suspended or fails, there is a risk of mixing between certified and non-certified catch. Therefore, CU (UK) will ensure that the client is prepared and well-versed for this scenario and ensure that the client understands that a) client's traceability systems would have to be re-assessed and b) if mixing cannot be prevented, the product will not be able to enter the supply chain as MSC certified. If CU (UK) becomes aware of incidents related to mixing and substitution, the CAB will report any concerns directly to ASI (in the form of an incident).</li> </ul>		
<b>6</b>	<b>How many conditions does the fishery have and will their progress be affected (positive or negative)?</b>		
	<p>Fishery is undergoing initial assessment therefore, the conditions have not yet been finalised.</p>		
<b>7</b>	<b>What is the status of the current assessment?</b>		
	<p>Initial assessment; approaching Client &amp; Peer Review Report submission, expected in early March.</p>		
<b>8</b>	<b>Further comments</b>		
	<p>This VR has been prepared following advice from the MSC, between Chrissie Sieben and Hannah Norbury, from the email dated February 19<sup>th</sup> 2021.</p>		
<b>9</b>	<b>If applicable, additional information added after MSC's request</b>		
	<p>N/A</p>		