

MSC Variation Request

*Tri Marine Pacific Ocean longline tuna fishery
November 10, 2022 (revised November 28, 2022)*

Marine Stewardship Council variation request

Table 1 – Variation request

1	Date submitted to the MSC
	November 28, 2022
2	CAB
	SCS Global Services
3	Fishery name and certificate number
	Tri Marine Pacific Ocean longline tuna fishery
4	Lead auditor or program manager
	Gabriela Anhalzer, Program Manager
5	Request prepared by
	Andrew Bystrom
6	Scheme requirement(s) for which variation requested
	A variation is requested against FCP v2.2. 7.16.1 following Derogation 3: Covid-19 Fishery and Chain of Custody Remote Auditing
7	How many times has a variation for this requirement been accepted for the same assessment of the same fishery?
	n/a – first request

Table 2 – Variation justification

1	Proposed variation	
	As permitted through and required by Section 1.3 of Derogation 3: Covid-19 Fishery and Chain of Custody Remote Auditing, SCS wishes to conduct portions of an initial assessment of the Tri Marine Pacific Ocean longline tuna fishery remotely. The variation is limited to the initial site visit.	
2	Additional time requested	
	Original deadline date	n/a
	Modified deadline date requested	n/a
	Length of additional time requested	n/a
3	Justification	
	The variation is requested to, in part, accommodate for travel risks related to Covid-19 and travel restrictions in the countries where part of the assessment team members are based (USA) and where the site visit would need to take place (Taiwan, Vanuatu, Singapore). The CAB is confident in the capacity and ability of the client, government scientists, and management personnel to support a remote assessment. The CAB will attempt to hold some on-site meetings if it identifies these activities as being essential to the audit (see section 9 for additional justification).	
4	Implications for assessment	
	The request to conduct the site visit for this assessment remotely with select meeting being held in-person presents a few challenges to gather information from relevant site visit participants. See table 3 below.	
5	Mitigation of the implications for assessment	
	The assessment team has conducted several assessments and surveillance audits remotely on other similar fisheries previously during COVID-19 prior to Derogation 3. Nevertheless, the assessment team will need to conduct additional interviews with relevant scientists and managers to ensure evidence is gathered as effectively as with an on-site visit. See table 3 below.	
6	How many conditions does the fishery have and will their progress be affected (positive or negative)?	
	Currently, the fishery does not have any conditions.	
7	What is the status of the current assessment or audit?	
	ACDR will be announced by November 14, 2022 and ACDR public consultation period is open until January 14, 2023.	
8	Further comments	
	n/a	
9	If applicable, additional information added after the MSC's request	

	<p>Additional information requested by the MSC:</p> <p>Regarding the justification of this variation, it is not logistically feasible for the assessment team to hold in-person meetings with all the entities that it will solicit additional information from (client representatives, fishing authority personnel from multiple flag states, researchers, onboard observers, transshipment observers, vessel owners, captains/crew, customs officials, stakeholder groups) because of the quantity of meetings that the team anticipates needing to stage. For this reason, we will conduct remote meetings with the entire assessment team participating via video calls. At the conclusion of these meetings, we will assess the audit's information gaps and conduct in-person meetings accordingly. We provide more information regarding specific meetings and attendees in section 9 (below).</p> <ul style="list-style-type: none"> - The variation is limited to the initial site visit. - Remote portions of the site visit include: <ul style="list-style-type: none"> • Client opening and closing meetings (all assessment team members to join via video calls) • Stakeholder meetings (all assessment team members to join via video calls) • Principle 1, 2, and 3 discussions/meetings with management and research entities (all assessment team members to join via video calls) - In-person (lead auditor) portions of the site visit include: <ul style="list-style-type: none"> • Additional information discussions, specific to Principle 2, with management entities, observers, customs/inspection officials, fishing authority personnel, captains, crew, and company representatives (P1, P2, and P3 auditors to attend via video calls) • Traceability meetings with vessel owners, company owners (P1, P2, and P3 auditors to attend via video calls)
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Table 3. Risk Areas, Justification, and Mitigation if applicable.

Risk Area	Level of Risk	Justification	Mitigation (if high)
Client and stakeholder input	Low	There are ample opportunities and mechanisms to engage with clients and stakeholders including electronic forms of communication, such as videoconferencing, phone conferencing, email and phone. The mechanisms are effective given the nature of the fishery/UoAs.	To facilitate stakeholder input and site visit meetings, SCS is investing time in preparing for onsite, proving written questions to stakeholders ahead of time.
Fishery reports, government documents, stock assessment reports and/or other relevant reports	Low	Fishery reports and other documented evidence that can be used to assess performance against the MSC Fisheries Standard can be reviewed remotely, due to such information being available publicly. Reports can be transmitted electronically, and veracity easily confirmed.	n/a
Information appropriate to determination of Principle 1 and Principle 2 information requirements (see Guidance to the MSC Fisheries Standard)	High	<p>P1- all information is publicly available</p> <p>Principle 2- Information to assess P2 was provided to the assessment team electronically at ACDR preparation.</p> <p>There are information Gaps on P2 RBF species, traceability, observer data, ETP outcome and</p>	Additional data requests are being made to the client to be submitted electronically via email or to be discussed in-person.

Risk Area	Level of Risk	Justification	Mitigation (if high)
		management, shark finning, and other concerns and gaps in information identified by the assessment team in the ACDR.	
Transparency of management system	Low	Information that would be obtained in person will be obtained remotely via meetings with stakeholders in management system	n/a
Vessels, gear, and other physical aspect of the fishery	Low	Physical inspection of the fishery would not be feasible in an in-person site visit due to the nature of the operations of the fishery.	n/a

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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](https://www.msc.org) (msc.org)

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