

## **Control Union (UK) Limited**

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

## **MSC Variation Request**

Control Union (UK) Limited

56 High Street, Lymington, Hampshire,  
SO41 9AH, United Kingdom

Tel: 01590 613007 Fax: 01590 671573

Email: [infofishuk@controlunion.com](mailto:infofishuk@controlunion.com)

Website: [uk.controlunion.com](http://uk.controlunion.com)

# 1 Marine Stewardship Council variation request

**Table 1 – Variation request**

<b>1</b>	<b>Date submitted to MSC</b>
	18/09/2020
<b>2</b>	<b>CAB</b>
	Control Union (UK) Limited
<b>3</b>	<b>Fishery name and certificate number or CoC certificate number</b>
	Micronesia Skipjack, Yellowfin and Bigeye Tuna Purse Seine Fishery
<b>4</b>	<b>Lead auditor or program manager</b>
	Beverley O’Kane
<b>5</b>	<b>Request prepared by</b>
	Beverley O’Kane
<b>6</b>	<b>Scheme requirement(s) for which variation requested</b>
	FCP v2.1 or v2.2 - 7.16 / G7.16 Site Visit: Team Attendance and September 2020 Covid-19 Pandemic Derogation – Requirements and Guidance - 1.3.2 – Submit a variation Request (as per GCR 4.12) to the MSC to conduct initial assessments remotely.
<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 1 – Variation justification

<b>1</b>	<b>Proposed variation</b>	
	The CAB proposes that the site visit for this fishery be conducted remotely, opposed to conducting an on-site visit in the Federated States of Micronesia.	
<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 assessment team proposes that the site visit for the initial assessment be conducted remotely.</p> <p>As per Covid-19, the MSC instated a derogation to ensure that site visits planned between the 27th March to 27th September 2020, could be held remotely. Following discussions with the MSC, the fishery was announced on 14<sup>th</sup> August, which stated that the site visit would be conducted remotely.</p> <p>The updated MSC Covid-19 Pandemic Derogation (effective 28<sup>th</sup> September 2020) states that “initial assessments and audits that are to be completed without an on-site visit will require CABs to submit a variation request and risk assessment for approval” and that “if national or local Covid-19 restrictions prevent Conformity Assessment Bodies (CABs), assessors or certificate holders from carrying out on-site audits and assessments of already certified businesses, these may be undertaken remotely.”</p> <p>Considering the above information, the justification for conducting a remote site visit as part of this assessment are as follows:</p> <p><u>Travel Restrictions:</u> This fishery is based in and around the Federated States of Micronesia (FSM). Because of the threat of Covid-19, the FSM Government state: “No passengers are allowed to disembark any air or sea vessel originating outside of Federated States of Micronesia, with the exception of individuals granted an exception from the National Government or those working on commercial sea vessels abiding precautionary measures and protocols”. Ultimately, if assessors were to travel to FSM at the moment, they would not be allowed into the country. In addition, one of our assessors resides in the Philippines where there remain significant and unpredictable <a href="#">travel restrictions regarding travel to Micronesia</a>.</p> <p><u>Safety:</u> The <a href="#">Centers for Disease Control and Prevention (CDC)</a> “recommends travellers avoid all non-essential international travel to Micronesia” and the current travel advice from the <a href="#">UK Foreign and Commonwealth Office (FCO)</a> states that “The Foreign and Commonwealth Office (FCO) advise against all but essential travel to Micronesia” (all dated 3<sup>rd</sup> September 2020).</p> <p><u>Attendance:</u> FSM have restrictions on <a href="#">interstate travel</a>, which would limit the attendance of the site visit even for those who live within FSM and limit opportunities for site visit activities, such as visiting ports/processors. In addition, the initial MSC derogation already enabled planning for a remote site visit to take place and several of the site visit attendees who are FSM nationals are currently not able to re-enter FSM</p>	

	(and temporarily residing in areas such as Guam). Changing the site visit to a on-site location would likely prohibit a large proportion of attendees from physically attending any meetings.
<b>4</b>	<b>If a fishery assessment, implications for assessment</b>
	The ACDR highlights multiple information gaps that need to be fulfilled at the site visit. These largely relate to the fishing methods and gear, with respect to FADs, logbook data, observer coverage, ETP interactions, PNA management and traceability, all of which can be addressed remotely via video conferencing or in some cases email. Any verification of information obtained can also be carried out by the team in this manner. We add that all stakeholders who are due to attend the site visit have indicated availability of remote conferencing equipment.
<b>5</b>	<b>If a fishery assessment, mitigation of the implication for assessment</b>
	Dedicated CU UK audit planning procedures were established following the Covid-19 derogation. The planning calls for an increased level of communication and coordination with the client and stakeholders to ensure remote meetings can run as smoothly and efficiently as possible. Additional time has been set aside so that meetings can be broken down into more manageable three-hour slots. The CAB's procedures have already been tested in this regard with the initial site visit of the CFTO Indian Ocean skipjack purse seine fishery which also took place remotely. As for any site visit, the CAB and team will ensure that MSC and ISO 19011 and ISO 17065 auditing procedures are followed at all times.
	The assessment team have previously conducted MSC full assessments for various tuna fisheries in this region, including another fishery assessment within the same country, and including multiple assessments for one member of the client group (Liancheng), whom are well versed and experienced in the MSC process and requirements.
<b>6</b>	<b>If a fishery assessment, how many conditions does the fishery have and will their progress be affected (positive or negative)?</b>
	This fishery is undergoing its initial assessment. There are no conditions at this stage. Conditions to be drafted in the Client and Peer Review Draft Report.
<b>7</b>	<b>What is the status of the current assessment?</b>
	The ACDR has been produced and the fishery has been announced, the team are preparing for a site visit.
<b>8</b>	<b>Further comments</b>
	The MSC require a risk assessment to be attached to this VR (which has been provided in Table 1).
<b>9</b>	<b>If applicable, additional information added after MSC's request</b>
	N/A

## 2 Appendix 1 – Risk assessment

Table 1 Key risks and mitigation explained. Key risks are identified by using the MSC’s September 2020 Covid-19 Pandemic Derogation – Requirements and guidance (Table 1).

Key Risks	Risks and mitigation explained
Ability to verify information remotely	<p>As per Table G1:</p> <ul style="list-style-type: none"> <li>- Client and stakeholder input: the ability to verify information remotely is low-risk as there will be multiple opportunities to engage with the client and stakeholders via videoconferencing, phone conferencing, email and telephone. This has been trialled with the same clients, some of the same stakeholders already and all of these facilities have been reliable.</li> <li>- Fishery reports, government documents, stock assessment reports and/or other relevant reports: The majority of the data required is publicly available e.g. via websites. Remote access is available to documents. Whilst there has been difficulty in accessing some documents e.g. PNA meeting minutes during the ACDR collection process, and these data are not publicly available, therefore, the ‘owners’ of these information gaps have been invited to the site visit and the assessment team acknowledge that these are priority information gaps to be fulfilled. Therefore, this is low-risk.</li> <li>- All information related to determine P1 and P2 (including VMS data, observer data, logbooks, fisher interviews, dockside monitoring) can be transferred electronically and easily interpreted. Therefore, this is low risk.</li> <li>- 3.1.1 in the ACDR considers there to be a good level of transparency in management, whereby information on the fishery is widely and publicly available or known to the wider group of stakeholders. There are some information gaps related to management, especially regarding FAD management, observer enforcement activities, and therefore, National Oceanic Resource Management Authority (NORMA), who are responsible for the development and management of the marine resources within FSM are identified as a key stakeholder in the site visit to gather data on these issues. Low risk</li> <li>- Information is being supplied on the vessels, gear and ports, and is to be discussed at the site visit. Verification will take place through interviewing a range of stakeholders. Low risk.</li> </ul>
Ability to engage with stakeholders, deliver a robust stakeholder consultation process and conduct interviews with stakeholders. Please refer to FCP 4.2, GFCP 4.2, and 7.16.	<p>A comprehensive stakeholder list has been drafted based on team expertise as well as client feedback and the CAB’s experience with other, similar fisheries. As per FCP requirements, the assessment will provide multiple opportunities in the assessment process for stakeholder to be consulted and to speak with the assessment team independently and confidentially, as desired.</p> <p>Dedicated CU UK audit planning procedures were established following the Covid-19 derogation. The planning calls for an increased level of communication and coordination with the client and stakeholders to ensure remote meetings can run as smoothly and efficiently as possible. Additional time has been set aside so that meetings can be broken down into more manageable three-hour slots. The CAB’s procedures have already been tested in this regard with the initial site visit of the CFTO Indian Ocean skipjack purse seine fishery which also took place remotely. As for any site visit, the CAB and team will ensure that MSC and ISO 19011 and and ISO 17065 auditing procedures are followed at all times and IAF MD 4:2018 is implemented as appropriate (as discussed below).</p>
Ability to gather information and carry out stakeholder consultations if the Risk Based Framework (annex PF) is being used to assess data-deficient Pis.	N/A – RBF is unlikely to be used based on findings in the ACDR.
Availability of information - FCP 7.10.2.h requires CABs to indicate the availability of	The nature of the assessment and scoring – there are multiple areas within the ACDR that identify where further information is required to be sought in the site visit. These largely relate to the fishing methods and gear, with respect to FADs, logbook data, observer coverage, ETP interactions, PNA management and traceability procedures. The team is confident that all of these matters can be resolved remotely, with additional data and documents submitted electronically. The precautionary

<p>information used to score each PI and to highlight potential information gaps. If the CAB identifies a large number of information gaps in the ACDR the CAB should consider if a remote site visit will be sufficient to obtain the necessary information.</p>	<p>scoring on ETP species is related to a lack of information on observer coverage which is why ETP species scoring was delayed until after the site visit. Again, this matter can be resolved remotely.</p>
<p>Ability to understand the context, scale, and intensity of the fishery operations</p>	<p>The assessment team have previously conducted MSC full assessments for various tuna fisheries in this region, including another fishery assessment within the same country, and including multiple assessments for one member of the client group (Liancheng). All of the assessment team have visited the region and have visited FSM port facilities. As per standard procedure, where information cannot be obtained by the team in situ, documentary evidence will be requested.</p>
<p>Availability of information and communication technology (ICT). Competency of assessment teams, auditees, and stakeholders in using ICT. Please refer to IAF MD 4:2018</p>	<p>The CAB ensures that its assessors have access to and are trained in Office 365 facilities, this includes Microsoft Teams as the teleconference software. The assessment team have already used Microsoft Teams to contact stakeholders and the client. Stakeholders will not need any licences/ software to access Microsoft Teams for any phone calls. A link will be provided to them in good time to be able to access any calls. Should any stakeholders be unable to use the software, Skype and other teleconference call facilities are also available and CU (UK) use multiple software in cases where Teams is not suitable e.g. when callers need to call in via landline. The assessment team are used to using Office 365 facilities and/or Dropbox with remote stakeholders in the region and have done for many years.</p> <p>As per IAF MD 4:2018, the assessment teams can record calls, will record attendance based on permission provided by those on the call. Confidentiality will be discussed at every call as per ISO 19011 and ISO 17065 requirements. Notes will also be recorded by assessment team members. Documents can be sent real-time via Microsoft Teams. This has been tested and is reliable. Assessment team members will arrive early for calls should any users want to test sound/ video quality and solve any technical issues.</p>
<p>Ability to clearly exchange information between the assessment team, prospective fishery client and stakeholders and to be understood by all parties when parties speak different languages.</p>	<p>The official language of the FSM is English, as is the language of most other stakeholders participating in the site visit. Although one of the client group members is based in Taiwan, all communication with regard to this project are in English. Stakeholders will all be given the opportunity in the site visit to contact the assessment team for a separate meeting should they wish.</p> <p>The assessment team have worked on fisheries projects together for many years and are in frequent contact. They are used to working together remotely and have shared documents with the clients and between each other for these years. As per FCP, the assessment team will ensure that stakeholders are involved throughout the process, and all of the team have tried to ensure that the stakeholder list is up-to-date as possible.</p>
<p>Ability to schedule remote site visit activities at reasonable mutually convenient times when parties are located across different time zones.</p>	<p>Whilst the assessment team and stakeholders cover multiple time zones, the assessment team are familiar with conducting assessments across these timezones and have proven that they are able to ensure that meetings are conducted at suitable times for these parties.</p>