



Sam Dignan
Global Trust Certification Ltd.

Sent by email

Date: 05/05/2021

Subject: Request for variation to the MSC Certification Requirement v2.2 FCP-7.28.16.1.b, 7.28.16.2, 7.28.16.4, 7.28.23.1 for ISF Greenland halibut, ISF Iceland anglerfish, ISF Iceland cod, Iceland haddock, ISF Iceland multi-species demersal fishery

Dear Sam Dignan,

I write with reference to your submission on 16/04/2021 of a request for variation to the MSC Certification Requirement (CR) to allow:

1. Global Trust proposes to apply the MSC Derogation 6 to a Performance Indicator (PI 2.3.1) not listed as eligible in Table 1 of that Derogation; this will extend existing condition deadlines for PI 2.3.1 conditions in the relevant fisheries by 12 months and add 12 months to the associated interim milestones.
2. Global Trust proposes to upload the relevant Surveillance Reports including revised Client Action Plans to the MSC database for publication on the MSC website within 120 days of completing the audit (i.e. an additional 30 days over and above the relevant requirement).

As you are aware, the CR procedures relating to v2.2 FCP-7.28.16.1.b, 7.28.16.2, 7.28.16.4, 7.28.23.1 state:

7.28.16.1.b: The CAB shall document whether progress is 'on target', 'ahead of target' or 'behind target', as well as its justification for such a judgement.

7.28.16.2: If the CAB determines that progress against a condition is not back 'on target' within 12 months of falling 'behind target', the CAB shall:

- a. Consider progress as inadequate.
- b. Apply the requirements of GCR Section 7.4 (suspension or withdrawal).
- c. Inform the fishery client that they cannot enter the same Unit of Certification(s), or any entity in the Unit(s) of Certification, until full assessment under either the same or an alternative name unless the cause for suspension has been addressed.

7.28.16.4: If a condition is not closed by its deadline, the CAB shall:

- a. Consider progress as inadequate.
- b. Apply the requirements of GCR Section 7.4 (suspension or withdrawal).
- c. Inform the fishery client that they cannot enter the same Unit(s) of Certification, or any entity in the Unit of Certification(s), into full assessment under either the same or an alternative name unless the cause for suspension has been addressed.

7.28.23.1: If the client has revised the Client Action Plan following surveillance, the CAB shall upload the Surveillance Report to the MSC database within 90 days of completing the audit for publication on the MSC website.

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 client has faced exceptional difficulties in making progress on conditions due to Icelandic fisheries management entities being unable to deploy inspectors/observers onboard vessels in 2020 to gather the data required to address these conditions.
- To avoid the mismatch that will arise when management (PI 2.3.2) and information (PI 2.3.3) conditions are extended it is necessary to also extend the associated outcome conditions which rely on both better management and better information for closure.
- The level of harmonisation required to fully align all ISF demersal fisheries has been extensive and has required substantial additional time to complete.

Given the rationale provided, the MSC is willing to grant a variation to the CR in this case subject to the following conditions:

Stakeholders are informed of the deadline extension for PI 2.3.1 conditions and new date of Surveillance Report publication.

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