

SAI Global

ISF Iceland lumpfish

MSC Variation Request

1 Introduction

This form details the information SAI Global is required to submit to the MSC to enable the MSC to consider an application to vary from a clause or requirement in any of the MSC program documents.

Once a Variation Request has been submitted the MSC will consider that request and will usually respond within 14 days.

2 Marine Stewardship Council variation request

Table 1. Variation request.

1	Date submitted to MSC
	Originally submitted: 04 March 2020 1 st revised version submitted: 11 March 2020 2 nd revised version submitted: 18 March 2020
2	CAB
	SAI Global
3	Fishery name and certificate number or CoC certificate number
	ISF Iceland lumpfish There is no fishery certificate number as this is not a certified fishery.
4	Lead auditor or program manager
	Sam Dignan (Lead Auditor)
5	Request prepared by
	Sam Dignan (Lead Auditor)
6	Scheme requirement(s) for which variation requested
	MSC FCP v2.1 §7.15 Stakeholder input on the Announcement Comment Draft Report 7.15.1 The CAB shall publish the Announcement Comment Draft Report for stakeholder input. 7.15.1.1 If an initial assessment, the CAB shall allow 60 days for stakeholder input.
7	How many times has a variation for this requirement been accepted for the same assessment of the same fishery?
	None. A variation to this requirement has not previously been accepted for this assessment of this fishery.

Table 2. Variation justification.

1	Proposed variation	
	To allow <60 days for stakeholder input on the Announcement Comment Draft Report (ACDR) and instead allow 39 days with the balance of 21 days to be added to the comment period on the Public Comment Draft Report (PCDR).	
2	Additional time requested	
	Original deadline date	Not applicable.
	Modified deadline date requested	Not applicable.
	Length of additional time requested	Not applicable.
3	Justification	
	<p>It had been SAI Global's intention to fully comply with this requirement by announcing this fishery on 27 February 2020 and holding the on-site visit in the week commencing 27 April 2020. Additionally, the Principle 3 (P3) assessor had indicated his availability for a site visit occurring on that week. Unfortunately, a slight delay due to circumstances outside of SAI Global's control related to a previous Variation Request, meant that this was not possible.</p> <p>Based on announcing on 19 March 2020, the earliest a site visit can take place is 18 May 2020. Due to commitments to other MSC projects the P3 assessor is not available until the week commencing 25 May 2020. Ultimately, a delay of one month from the originally proposed site visit dates is highly undesirable from the client's point of view and SAI Global does not want to have to change P3 assessors at this point due to the current P3 assessor's already having extensive knowledge of the fishery through his involvement in drafting the ACDR for this fishery. SAI Global therefore requests that we be allowed to reduce the stakeholder comment period on the ACDR from 60 to 39 days.</p> <p>Firstly, while ostensibly a new assessment, the applicant fishery was in fact previously MSC-certified under the name 'Icelandic Gillnet lumpfish' but withdrew from the MSC process in April 2019; documents related to that previous incarnation of this fishery are available on the MSC website at: https://fisheries.msc.org/en/fisheries/icelandic-gillnet-lumpfish/@@view</p> <p>As this is not an entirely new fishery stakeholders are already aware of the major issues involved (i.e. as they would be with a reassessment) such that any period equal to or in excess of the 30 days required for a re-assessment should be entirely sufficient for them to effectively provide input on the ACDR. Despite this, SAI Global intends to adhere as closely as possible to the 60-day requirement and put in place significant measures to mitigate the impact of any deviations from this requirement.</p> <p>According to the MSC Fisheries Certification Process and Guidance, one of the major purposes of the FCP is to provide transparency to maintain credibility with stakeholders. Furthermore, according to §G4.2 Consultation requirements, stakeholder engagement is a critical component of the MSC fisheries assessment process, is fundamental to conducting a high-quality assessment, provides important information to assessment team members and CABs and contributes significantly to the credibility and outcome of the assessment process. All of these objectives will still be achieved with a 39-day comment period on the ACDR.</p> <p>On a positive note, reducing the comment period in this instance (to 39 days) would allow a site visit to take place in late-April whereas with a 60-day comment period, and considering the P3 assessor's availability constraints, a site visit would not be possible until late-May. Allowing the site visit to take place a month earlier is obviously much preferable to the fishery client and would have the added benefit of avoiding the height of the tourist season in Iceland.</p>	

Table 2. Variation justification.

4	<p>If a fishery assessment, implications for assessment</p> <p>No negative implications from reducing the comment period. As discussed previously, all of the major purposes of the 60-day comment period would still be achieved with a 39-day comment period.</p> <p>Not allowing SAI Global to shorten the comment period to 39 days leaves SAI Global with two choices, both of which have negative implications; 1) delay the assessment for a month or 2) change the already involved P3 assessor.</p> <p>Therefore, granting this variation would have positive implications it that it would allow the audit to take place in late-April rather than late-May and would allow SAI Global to continue using the P3 assessor that drafted the ACDR.</p>
5	<p>If a fishery assessment, mitigation of the implication for assessment</p> <p>SAI Global will:</p> <ol style="list-style-type: none"> 1. Publish any written comments on the ACDR submitted by stakeholders during the 39-day comment period before the site visit in accordance with MSC FCP v2.1 §7.15.5. Comments submitted up until 60 days after announcement will still be uploaded in accordance with MSC FCP v2.1 §7.15.5 but this will occur during/after the site visit. 2. Allow stakeholders who wish to do so to consult remotely (i.e. as part of the site visit) with the assessment team up until 65 days after announcement. 3. Add the time lost from this round of stakeholder to the later comment period on the PCDR by extend the required period for stakeholder consultation on the PCDR from the required 30 days to 51 days. The overall effect will be that there will still be a total of 90 days of stakeholder comment period spread between the ACDR and PCDR comment periods. 4. Immediately upon announcement directly contact the main stakeholders likely to be involved in this assessment (i.e. those who were previously involved in the withdrawn iteration of this fishery) advising them of the site visit.
6	<p>If a fishery assessment, how many conditions does the fishery have and will their progress be affected (positive or negative)?</p> <p>None. The fishery is not currently certified.</p>
7	<p>What is the status of the current assessment?</p> <p>The fishery is entering assessment.</p>
8	<p>Further comments</p>
9	<p>If applicable, additional information added after MSC's request</p> <p>The following additional information was added on 18 March 2020 at MSC's request.</p> <p>For the purposes of transparency and accuracy we would like to point out that there are a number of other MSC requirements that are linked to this Variation Request. How SAI Global intends to address these linked requirements is specifically addressed below.</p> <ul style="list-style-type: none"> ▪ <i>7.12.3.1. The CAB shall organise the site visit to commence after the stakeholder input on the Announcement Comment Draft Report, as detailed in 7.15.</i> <ul style="list-style-type: none"> – The site visit will commence after the 39-day stakeholder input period. In addition, stakeholder submissions will be accepted up until 60 days post-announcement (i.e. 18 May 2020).

Table 2. Variation justification.

	<ul style="list-style-type: none">▪ <i>7.15.5. The CAB shall upload all written stakeholder input received from the stakeholder consultation on the Announcement Comment Draft Report to the MSC database for publication on the MSC website before the commencement of the site visit and inform registered stakeholders that this has been completed.</i><ul style="list-style-type: none">– SAI Global will upload all written stakeholder input relating to the Announcement Comment Draft Report received within 60 days of announcement (i.e. by 18 May 2020) to the MSC webpage for this fishery.
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3 Template information and copyright

This document was drafted using the 'MSC Variation Request Form v3.1'. While amendments have been made to formatting in order to comply with SAI Global's corporate identity, SAI Global has ensured that content and structure follow that of the original template.

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Table 3. Template version control.

Version	Date of publication	Description of amendment
1.0	1 January 2011	Date of application
1.1	24 October 2011	Updated to include a confidential information section
1.2	10 January 2012	Updated to include more detailed instructions on confidential information section
1.3	14 January 2013	Updated in line with requirements in MSC Certification Requirements v1.3, including P2 to P1 'expedited audit'
2.0	08 October 2014	Updates in line with release of Fisheries Certification Requirements v2.0
2.1	04 October 2016	Updated contact information
3.0	17 December 2018	Release alongside Fisheries Certification Process v2.1
3.1	28 March 2019	Non-substantive changes to improve clarity and usability

A controlled document list of MSC program documents is available on the [MSC website](http://msc.org) (msc.org).

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