

Lloyd's Register

Muslingeriet Rope Grown Mussel Fishery

MSC Variation Request

1 Marine Stewardship Council variation request

Table 1 – Variation request

1	Date submitted to the MSC
	24/08/2021
2	CAB
	Acoura Marine (t/a Lloyd's Register)
3	Fishery name and certificate number
	Muslingieriet Rope Grown Mussel Fishery (initial assessment)
4	Lead auditor or program manager
	Jim Andrews
5	Request prepared by
	Ylva Longva
6	Scheme requirement(s) for which variation requested
	Variation request to conduct the initial audit site visit remotely as per MSC Derogation 3: Covid-19 Fishery and Chain of Custody Remote Auditing V3. (MSC FCP 2.2, 7.16.1 – location = remote)
7	How many times has a variation for this requirement been accepted for the same assessment of the same fishery?
	0

Table 2 – Variation justification

1	Proposed variation	
	To carry out the initial site visit for the Muslingeriet Rope Grown Mussel Fishery <u>remotely</u> . Under clause 1.1 of the MSC February 26 th 2021 Covid-19 derogation (derogation 3), certain Covid-19 factors prevent an initial onsite assessment for this fishery	
2	Additional time requested	
	Original deadline date	NA
	Modified deadline date requested	NA
	Length of additional time requested	NA
3	Justification	
	<p>The assessment of the Muslingeriet Rope Grown Mussel Fishery would have been conducted in Denmark under normal circumstances. The Team Leader and P3 assessor would have been traveling from the UK to Denmark and within Denmark. The P2 assessor would have been traveling within Denmark.</p> <p>In view of the risks associated with these travel plans during the pandemic and the travel restrictions currently in place, LR are proposing to hold the initial site visit remotely (i.e. the client group, stakeholders and all team members attend the initial assessment remotely).</p> <p>The factors preventing an onsite assessment are:</p> <ol style="list-style-type: none"> 1. CAB company policies: LR have suspended all non-critical business travel. This assessment is considered non-critical in terms of the need to be conducted on site and in person. 2. Travel restrictions: Currently, travel from the UK to Denmark is not subject to restrictions for fully vaccinated individuals, <u>but the rules could change at very short notice</u>. Upon return to the UK, there is a requirement for negative Covid-19 tests taken within 72 hours of departure and again a test on Day 2 after arrival in the UK, which could be impractical to the assessor. 3. Health risks of conducting an in-person audit/assessment to anyone involved in the audit process: None of the audit team members are considered “vulnerable” as per the UK NHS definition. 	
4	Implications for assessment	
	The planning phase of the audit will be conducted in the same manner as an onsite audit. During the time since the Covid-19 derogation was introduced, LR have conducted many remote site visits for both surveillance audits, expedited audits, and new assessments. The opportunity for stakeholder engagement will not be compromised by the use of off-site auditing methods. LR’s auditors are very familiar with the fisheries in this area, having assessed other mussel fisheries in the area, and are extremely familiar with the relevant stakeholders. For these reasons, LR do not consider that conducting this assessment off-site will compromise the integrity or robustness of the assessment or the extent and effectiveness of stakeholder engagement in the assessment process.	

5	Mitigation of the implications for assessment																														
	See Table 1 – Risk Assessment that is a requirement of the Sept 28 th MSC Covid-19 derogation v3.																														
6	How many conditions does the fishery have and will their progress be affected (positive or negative)?																														
	This fishery is currently under assessment and has no conditions as yet. Conditions will be harmonised where necessary.																														
7	What is the status of the current assessment or audit?																														
	<p>The fishery entered assessment on the 23rd August 2021 under version 2.2 of the MSC FCP. Stakeholders now have a 60 day consultation period and the site visit is scheduled on the week commencing 1st November 2021.</p> <table border="1"> <thead> <tr> <th>Stage</th> <th>Processing Time</th> <th>Approximate timeframe</th> </tr> </thead> <tbody> <tr> <td>ACDR publication (60-day stakeholder engagement)</td> <td>60 days</td> <td>Published 23rd August 2021</td> </tr> <tr> <td>Site visit</td> <td>1 week</td> <td>Week commencing 1st November 2021</td> </tr> <tr> <td>Scoring</td> <td>30 days</td> <td>8th November 2021 – 7th December 2021</td> </tr> <tr> <td>CPRDR (60-day consultation)</td> <td>60 days</td> <td>7th December 2021 – 5th February 2022</td> </tr> <tr> <td>Publish PCDR to MSC, peer reviewers + stakeholders (30 days)</td> <td>30 days</td> <td>9th February 2022 – 11th March 2022</td> </tr> <tr> <td>Publish FDR + Objection template (15-working day objection period)</td> <td>15 working days</td> <td>14th March 2022 – 4th April 2022</td> </tr> <tr> <td>Publish PCR + labor policies form within 60 days</td> <td></td> <td>5th April 2022</td> </tr> <tr> <td>Certification (within 10 days of PCR)</td> <td></td> <td>5th April 2022</td> </tr> <tr> <td>Certificate awarded</td> <td></td> <td>5th April 2022</td> </tr> </tbody> </table>	Stage	Processing Time	Approximate timeframe	ACDR publication (60-day stakeholder engagement)	60 days	Published 23 rd August 2021	Site visit	1 week	Week commencing 1 st November 2021	Scoring	30 days	8 th November 2021 – 7 th December 2021	CPRDR (60-day consultation)	60 days	7 th December 2021 – 5 th February 2022	Publish PCDR to MSC, peer reviewers + stakeholders (30 days)	30 days	9 th February 2022 – 11 th March 2022	Publish FDR + Objection template (15-working day objection period)	15 working days	14 th March 2022 – 4 th April 2022	Publish PCR + labor policies form within 60 days		5 th April 2022	Certification (within 10 days of PCR)		5 th April 2022	Certificate awarded		5th April 2022
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8	Further comments
	As required by the derogation (at 1.4.1), LR will request an additional Peer Reviewer when implementing FCP 7.14.
9	If applicable, additional information added after the MSC's request

LR Risk assessment for initial assessments conducted remotely following the [MSC Derogation 3: Covid-19 Fishery and Chain of Custody Remote Auditing published 26 February 2021](#). This risk assessment shall be completed as part of VRs for initial assessments announced after the 28th September 2020 requesting a switch to a remote initial assessment.

Table 1.

Risk areas	Key risks	LR Mitigation plan
<p>Sufficient information to enable an effective and robust fishery assessment process and comprehensive assessment against the MSC Fisheries Standard</p>	<p>Ability to verify information remotely</p>	<p>The Client has already provided information to LR, which has been shared with the audit team. While drafting the ACDR, two conference calls were held between the audit team and the client to discuss the information further. The client is committed to arranging all necessary documentation, reports, evidence and discussion with the team remotely. LR use online platforms to communicate with stakeholders and are available to all enquires via phone and email.</p> <p>The nature of this fishery (rope grown mussels) simplifies the site visit and information requirements significantly, for the following reasons:-</p> <ol style="list-style-type: none"> 1. A reduced assessment tree is being used, with no need to assess Principle 1 or the Primary and Secondary species components of Principle 2. 2. Fishery operations are conducted entirely within Danish internal waters, with no other coastal states involved. 3. The UoA boundary (four mussel farming areas) is entirely under the purview of the client and the Danish Government – there are no other fishery removals from the UoA. 4. The spatial extent of the UoA and fishing areas is fixed by law, so there is no prospect of the extent of the fishery altering.

	<p>Ability to engage with stakeholders, deliver a robust stakeholder consultation process and conduct interviews with stakeholder.</p>	<p>LR have an extensive list of potential stakeholders, identified through engagement with other similar fisheries in the region as well as with client input.</p> <p>Stakeholders will be notified of the fishery entering into assessment and that the ACDR is available for comments via MailChimp email notification. All stakeholder enquiries come into the LR fisheries shared email inbox and is responded to within 10 days of receipt. Submissions received in the MSC stakeholder input template will be acknowledged via email and uploaded to the MSC website as required by the process.</p> <p>Private meetings will be offered to interested stakeholders as part of the audit planning. The full assessment team will be available for meetings during the site visit and questions can be prepared ahead of time to help direct the conversation. Due to the remote nature of the site visit, additional meetings can be scheduled if needed. Test calls will be offered to all stakeholders prior to the official audit calls, in case some people are not familiar with the platform used. The various features of interaction on the chosen platform will be explained to stakeholders. Permission to record the calls will be requested and recordings will be provided to those stakeholders who joined the call upon request. A follow-up call will be offered to the stakeholder if the initial allocation of time is too short to complete the discussion.</p>
	<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.</p>	<p>Not applicable.</p>
	<p>Availability of information</p>	<p>The Client has already provided information to LR, which has been shared with the audit team. Current information gaps</p>

		have been identified in the ACDR available on the MSC website. Having worked with stakeholders in Denmark on many previous occasions, the team are confident that these information gaps can be addressed via a remote assessment.
	Ability to understand the context, scale, and intensity of the fishery operations.	<p>The assessment team have assessed similar fisheries (rope grown mussels) in the region (same fjord) and have made several visits there. One member of the team is Danish and knows the Limfjord particularly well.</p> <p>Therefore, the team have an excellent understanding of the context, scale and intensity of the fishery operations.</p>
Sufficient communication capability to effectively plan, conduct interviews and facilitate information sharing as per IAF ID 4: 2018 .	Availability of information and communication technology (ICT).	<p>The client and audit team members all have experience using LR chosen conferencing platforms and familiar with share screen, and recording function. Meetings are organised by LR HO staff who will confirm the attendees are comfortable using the chosen platform, test calls will be set up if not. Meetings will be held in English but relevant LR HO staff and one team member can both communicate with the client in Danish and provide translations if necessary.</p> <p>Stakeholders do not need an account with these platforms to join the meeting. If stakeholders do not have an internet connection attendees can join a Skype for Business call from a landline or mobile number.</p> <p>The use of ICT for this assessment will be done in accordance with the IAF Mandatory Document for the use of Information and Communication Technology (ICT) for Auditing/Assessment Purposes</p>
	Competency of assessment teams, auditees, and stakeholders in using ICT.	As above.

	<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>English is widely spoken in Denmark and meetings will be held in English.</p> <p>Relevant LR HO staff and one team member can both communicate in Danish and provide translations if necessary.</p>
	<p>Ability to schedule remote site visit activities at reasonable mutually convenient times when parties are located across different time zones.</p>	<p>Attendees to remote calls will be asked to confirm their timezones in advance of the site visit, where possible meetings will be organised at mutually convenient times. LR use the following website for scheduling meetings across time zones: https://www.timeanddate.com/worldclock/meeting.html</p> <p>This website allows you to see which times are best for all attendees. If needed the audit team are prepared to work outside of normal working hours to accommodate client and stakeholders. This will be kept to an absolute minimum.</p>

Annex 1. LR review of call platforms. MS Teams is the default platform choice by LR unless inaccessible by stakeholders.

Call platform	Risk	Reward
MS Teams – LR default platform to use unless inaccessible by stakeholders	<ul style="list-style-type: none"> • New platform, not everyone is familiar • Simultaneous translation feature new and not adequate for MSC audit conversations 	<ul style="list-style-type: none"> • Can access calls online without downloading desktop app • Chat log remains open after call • Ability to share screen • Invites automatically add to outlook calendar • Approved by LR for use and LR team can control invites and test calls • Can record sessions for sharing with stakeholders later • Can download participant list directly, including their sign in / sign out time • Can adjust settings allowing participants to bypass lobby if needed
Skype for Business	<ul style="list-style-type: none"> • Chat log not saved after call ends • Online app support ending 31st July 2021 • Call ends after 1.5 hours. 	<ul style="list-style-type: none"> • Can access calls online without downloading desktop app • Invite sender does not need to be present • Ability to share screen • Invites automatically add to outlook calendar • Approved by LR for use and LR team can control invites and test calls
Zoom	<ul style="list-style-type: none"> • Not secure • New platform, not everyone is familiar • No LR subscription and no plan to use it so can not set up meeting • Not approved by overall LR policy for LR staff to initiate calls 	<ul style="list-style-type: none"> • Can access calls online without downloading desktop app • Ability to share screen

2 Template information and copyright

This document was drafted using the 'MSC Variation Request Form – Fisheries v1.0'.

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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 (msc.org).

Marine Stewardship Council
Marine House
1 Snow Hill
London EC1A 2DH
United Kingdom

Phone: + 44 (0) 20 7246 8900
Fax: + 44 (0) 20 7246 8901
Email: standards@msc.org