

Bureau Veritas Certification Holding SAS

CHILE SQUAT LOBSTERS AND NYLON SHRIMP MODIFIED TRAWL

MSC Variation Request

Table 1 – Variation request

1	Date submitted to the MSC
	13 th September 2021
2	CAB
	BUREAU VERITAS CERTIFICATION HOLDING SAS
3	Fishery name and certificate number or CoC certificate number
	MSC-F-31264 : Chile squat lobsters and nylon shrimp modified trawl
4	Lead auditor or program manager
	Gemma Quílez: gemma.quilez@bureauveritas.com
5	Request prepared by
	Carmen Morant Sánchez
6	Scheme requirement(s) for which variation requested
	As stated in Derogation 3: Covid-19 Fishery and Chain of Custody Remote Auditing (Available at: https://www.msc.org/docs/default-source/default-document-library/for-business/program-documents/chain-of-custody-supporting-documents/msc-derogation-3-covid-19-fishery-and-chain-of-custody-remote-auditing.pdf), clause 1.3b. mentions that the CAB shall "Submit a variation request (as per GCR 4.12) to the MSC to conduct initial assessments remotely". The variation request that the team is requesting is against FCP 2.2 7.16.
7	How many times has a variation for this requirement been accepted for the same assessment of the same fishery?
	None

Table 2 – Variation justification

1	Proposed variation	
	The CAB is requesting to perform the site visit for the recertification of the fishery remotely.	
2	Additional time requested	
	Original deadline date	NA
	Modified deadline date requested	NA
	Length of additional time requested	NA
3	Justification	
	<p>Due to the coronavirus outbreak and in line with the MSC Updated Derogation effective since 28 September 2020 (click here), the CAB can change to a remote audit in response to travel restrictions and/or health risks issues. If this happens, the CAB will launch a Variation Request to the MSC and inform to the stakeholders as appropriate.</p> <p>Currently, Chile maintains strict sanitary restrictions to enter the country (10 quarantine days are required), therefore, an off-site site visit is requested due to the complications and related costs of having 2 foreign auditors in quarantine during 10 days in Chile.</p>	
4	If a fishery assessment, implications for assessment	
	The assessment team considers that there are no implications for the assessment.	
5	If a fishery assessment, mitigation of the implications for assessment	
	<p>There are no implications (or risks) for the assessment. During this remote audit relevant information will be collected and assessed, and meetings with different stakeholders (fisher's representatives, managers, scientists, and NGOs) will be held. Written information can be provided to the assessment team as an alternative, or in addition, to an onsite meeting or remote conference call.</p>	
	Risk areas	
	Sufficient information to enable an effective and robust fishery assessment process and comprehensive assessment against the MSC Fisheries Standard	<p>Since this is an initial site visit for a second cycle of certification (re-assessment) and remote audits have been conducting for over a year due to the COVID-19 pandemic situation, the team considers that there is ability to verify information remotely, ability to engage with stakeholders, deliver a robust stakeholder consultation process and conduct interviews with stakeholder. All team members have a long experience working with this fishery (they all have been involved in the previous 4 surveillance audits, the last one carried out last June). So, they all have interviewed several times all relevant stakeholders. Also, all stakeholders involved have always shown a high degree of cooperation and have shown enough technical capability to perform remote meetings during the last surveillance audit performed in June 2021.</p>

	<p>All technical reports prepared by Subpesca (competent management authority) and IFOP (competent research body in charge of stock assessment and research programs on discards and others) are publicly available at specific websites. All regulations issued by competent authorities (Subpesca and Sernapesca) can be downloaded at the website. All minutes and technical reports prepared by the fishery-specific technical committee are available at specific website, and that is also the case for all minutes of the fishery-specific management committee. Other relevant information related to compliance can be requested online to Sernapesca and it shall be delivered within 15 days, in compliance with the a national transparency Law. There is sufficient information on all relevant issues (P1, P2 and P3) that can be easily and transparently checked remotely.</p> <p>So BV considers that there is:</p> <ul style="list-style-type: none"> - Ability to verify information remotely - -Ability to engage with stakeholders, deliver a robust stakeholder consultation process and conduct interviews with stakeholders. - -Ability to gather information and carry out stakeholder consultations related to the RBF on 3 main secondary species (as identified in the ACDR) - Availability of information for each PI. The CAB identified several information gaps in the ACDR, but they are all very specific issues which were highlighted with the intention of providing a good guidance during the meetings with the stakeholders. They are all issues which can be easily address remotely with the right stakeholders - Ability to understand 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 MD 4: 20181.</p>	<p>The communication technology planned to be used have been checked and all the team members and stakeholders have effectively used it in the past. Also, language is not a barrier in this process as the team leader is fluent in both English and Spanish. The team leader has also plenty of experience scheduling and conducting remote site visits across different time zones. One team member is located in Chile, another one in Newfoundland and the team leader is based in Spain. There is ability to schedule remote visit activities at reasonable mutually convenient times between these three places, as demonstrated during the 4th surveillance audit performed in June. There is only 90 minutes difference between Chile and Newfoundland, so that is not an issue. At this moment of the year, there are 5 hours difference between Chile and Spain, so meetings scheduled during morning time in Chile will correspond to</p>

		early afternoon in Spain (9am in Chile is 2pm in Spain).
6	If a fishery assessment, how many conditions does the fishery have and will their progress be affected (positive or negative)?	
	There are two conditions open at reassessment, one condition on PI 1.2.3 and another one on PI 1.2.4. The expected deadlines are 2024 for the condition on PI 1.2.3, and 2023 for the condition on PI 1.2.4 (since the 1-year Covid-19 derogation does not affect conditions on PI 1.2.4). Since all the necessary information to assess progress on these conditions is available on line and can be verified through remote consultation with the stakeholders, these conditions will not be affected by this variation request.	
7	What is the status of the current assessment or audit?	
	The ACDR for the re-assessment has been published and now 30-day consultation period is opened for stakeholders.	
8	Further comments	
	The same Variation request will be prepared for the overlapping fishery named Chile squat lobsters Camanchaca demersal trawl fishery.	
9	If applicable, additional information added after the MSC's request	
	N/A	