

Lloyd's Register

Antey Sever Barents Sea Crab fishery

MSC Variation Request

1 Marine Stewardship Council variation request

Table 1 – Variation request

1	Date submitted to the MSC
	18 th November 2020
2	CAB
	Acoura Marine (t/a Lloyd's Register)
3	Fishery name and certificate number
	Antey Sever Barents Sea Crab fishery - In assessment
4	Lead auditor or program manager
	Kate Morris – Project manager Geir Honneland – Team Lead
5	Request prepared by
	Kate Morris
6	Scheme requirement(s) for which variation requested
	Variation request to conduct the initial audit site visit remotely as per MSC Covid-19 Pandemic Derogation V2. (MSC FCP 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 Antey Sever Barents Sea Crab fishery <u>remotely</u> . Under clause 1.1 of the September 2020 Covid-19 derogation, certain Covid-19 factors prevent an initial onsite assessment for this fishery.
2	Additional time requested
	Original deadline date n.a
	Modified deadline date requested n.a
	Length of additional time requested n.a
3	Justification
	<p>The audit of Antey Sever Barents Sea Crab fishery under normal circumstances would have been held in Tromsø, Norway. LR audit team would be travelling from the UK, US and within Norway. The Client would be travelling from Russia. LR are proposing to hold the initial site visit remotely (i.e. the client group, stakeholders and all team members attend the initial audit remotely). Factors preventing an onsite audit are as follows:</p> <p>a. National or local travel restrictions that impact the assessment team or certificate holder. At the time of drafting this variation request, there is currently a 10 days quarantine requirement for entrants entering Norway from <i>any</i> foreign country. Holding an onsite audit in Russia is not an option either as Russia has a ban in place on any foreign nationals entering the country, with a few exceptions. UK nationals are permitted to enter Russia but must quarantine until a negative Covid-19 test produced, Norway and America are not permitted entry. The US also require entrants to quarantine on return from either Norway or Russia.</p> <p>b. Health risks of conducting an in-person audit/assessment to anyone involved in the audit process. Members of the client group and the audit team have expressed concerns of high infections rates in Norway (especially Oslo, Bergen and Tromsø), Russia and the UK (just to consider all three options for a site visit).</p> <p>c. Certificate holder or CAB company policies. There are a set of limits for personal meetings and outside visitors in the organisations LR would need to see if onsite, including PINRO and Federal Fisheries Agency local office in Murmansk. In PINRO, for example, all elder personal are not allowed in the office and work from home. Due to restrictions, it will be hard to agree travel for PINRO personnel for meetings outside Murmansk and abroad. Finally, LR have suspended all non-critical business travel.</p>
4	Implications for assessment
	The planning phase of the audit will be conducted in the same manner as an onsite audit. The Site visit may take longer than a traditional onsite audit because meetings will take place over more days to account for the time differences and interpretation. Interpretation support will be provided on the calls and additional time allowed for interpretation. LR have conducted a remote site visit for Russia Sea of Okhotsk (scope extension) recently where interpretation was needed, the site visit was organised by LR in partnership with Alexey Buglak (PCA Pollock President and consultant and primary LR contact for the Crab Catchers Association (c)). The opportunity for stakeholder engagement will be the same and LRs auditors are very

	familiar with the fishery having assessed the other two MSC Certified Opilio and Red King Crab Barents Sea fisheries.																						
5	Mitigation of the implications for assessment																						
	See Table 3 – Risk Assessment that is a requirement of the Sept 28 th MSC Covid-19 derogation v2.																						
6	How many conditions does the fishery have and will their progress be affected (positive or negative)?																						
	n.a – initial audit therefore no conditions in place as of yet																						
7	What is the status of the current assessment or audit?																						
	<p>The audit team are drafting the Announcement Comment Draft Report. Proposed timeline is below:</p> <table border="1"> <thead> <tr> <th></th> <th>Barents Sea Crab</th> </tr> </thead> <tbody> <tr> <td>Deadline for client document checklist</td> <td>Oct 12 2020</td> </tr> <tr> <td>Team prepares ACDR</td> <td>Oct - Nov 27th</td> </tr> <tr> <td>Client Reviews ACDR</td> <td>30th Nov -</td> </tr> <tr> <td>ACDR publication (60-day stakeholder engagement)</td> <td>7th Dec</td> </tr> <tr> <td>Site visit</td> <td>8th Feb -</td> </tr> <tr> <td>Scoring</td> <td>Feb 2021 -April</td> </tr> <tr> <td>CPRDR (60 day consultation)</td> <td>April - June</td> </tr> <tr> <td>Publish PCDR to MSC, peer reviewers + stakeholders (30 days)</td> <td>June -July</td> </tr> <tr> <td>Publish FDR + Objection template (15 day objection period)</td> <td>August - September</td> </tr> <tr> <td>Publish PCR + labor policies form within 60 days</td> <td>October 2021</td> </tr> </tbody> </table>		Barents Sea Crab	Deadline for client document checklist	Oct 12 2020	Team prepares ACDR	Oct - Nov 27th	Client Reviews ACDR	30th Nov -	ACDR publication (60-day stakeholder engagement)	7th Dec	Site visit	8th Feb -	Scoring	Feb 2021 -April	CPRDR (60 day consultation)	April - June	Publish PCDR to MSC, peer reviewers + stakeholders (30 days)	June -July	Publish FDR + Objection template (15 day objection period)	August - September	Publish PCR + labor policies form within 60 days	October 2021
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8	Further comments																						
	- Please include any further relevant information.																						
9	If applicable, additional information added after the MSC's request																						

LR Risk assessment for initial assessments conducted remotely following the [MSC COVID-19 derogation, effective 28th September 2020](#). 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 3.

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 comprehensive information to LR, which has been shared with the audit team. While drafting the ACDR regular teams calls were held between the audit team and the client to discuss the information further. Both the client and audit team are familiar with conducting remote audits. The client is committed to arrange 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. LR carried out the other two Barents Sea Red King Crab (RKC) and Opilio MSC assessments, audit team and LR HO staff are familiar with the fishery and stakeholders involved. Broadband services are good allowing documents to be shared during meetings etc.</p> <p>Crab Catchers Association have a website where they post relevant fishery reports. Compliance statistics and observer reports have already been provided to LR in pdf format. Information gathering is ongoing to ensure a productive site visit. The management system has a high level of transparency and has been assessed under other MSC certified fisheries (harmonisation on P1, some P2 and P3 PIs).</p> <p>The physical aspects of the fishery do not need to be investigated because the audit team are very familiar with the fishery and the client has already provided documentation on gear and deployment methods.</p>
	<p>Ability to engage with stakeholders, deliver a robust stakeholder consultation process and conduct interviews with stakeholder.</p>	<p>LR, having assessed Opilio and RKC recently, are familiar with the fishery and have comprehensive stakeholder lists already. Stakeholders will be notified of the fishery entering into assessment and that the ACDR is available for comments. 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 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.</p>

		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.
	Ability to gather information and carry out stakeholder consultations if the Risk Based Framework (annex PF) is being used to assess data-deficient PIs.	The ACDR report has not identified any RBF triggers, therefore it is expected RBF will not be required.
	Availability of information -	The Client has already provided comprehensive information to LR, which has been shared with the audit team. The UoA under assessment here has also been assessed, in part, by LR under two other MSC certificates: the Russia Barents Sea Red King Crab fishery and the Russia Barents Sea Opilio Trap fishery. The in assessment UoA will be harmonised with the P1 and P3 aspects of the certified fisheries. Some P2 aspects will also require harmonisation. The ACDR draft scoring ranges suggest an assessment outcome similar to the other certified UoCs; i.e. no PI currently scoring <60 at the ACDR stage and with a potential for similar conditions as certified fisheries. In drafting the ACDR each PI was evaluated for information availability; some information gaps have been identified and the client is working on providing additional evidence at the site visit. The team are confident all aspects of the fishery can be investigated appropriately at a remote site visit.
	Ability to understand the context, scale, and intensity of the fishery operations.	Two members of the audit team (including the team leader) assessed the RKC and Opilio Crab fisheries and are familiar with fishery and information sources. Where reports are provided in Russian two members of the audit team are fluent in spoken and written Russian. Furthermore, the physical aspects of the fishery do not need to be investigated because the audit team are very familiar with the fishery and the client has already provided documentation on gear and deployment methods.
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).	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 all attendees will be asked to confirm if they need translation support prior to the site visit. Stakeholders do not need an account with these platforms to join the meeting. If stakeholders do not have an internet connection

		<p>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.
	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.	Meetings will be held in English but all attendees will be asked to confirm if they need translation support prior to the site visit. Two of the assessment team members are fluent in Russian, which will facilitate meetings. Additional time will be allocated to meetings to accommodate an interpreter when needed. LR have conducted many remote meetings that have required an interpreter since March 2020 and can use this experience to ensure a satisfactory remote audit.
	Ability to schedule remote site visit activities at reasonable mutually convenient times when parties are located across different time zones.	<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:</p> <p>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).

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