

U.S. Gulf of Mexico menhaden purse seine & Omega Protein Corporation U.S. Atlantic menhaden purse seine

Stakeholder Advisory regarding Global Trust Certification's intention to conduct the Surveillance Audit outside of the allowed 6 month window

Global Trust Certification wishes to notify stakeholders that we intend to carry out the (combined) 2nd surveillance audit of the above fisheries outside the 6-month window allowed under the MSC FCP v2.2 §7.28.8.1.

The MSC GCR v2.4.1 § 4.12.2.d prevents CABs from submitting a retrospective Variation Request. Because it is too late to submit a Variation Request, Global Trust Certification is required to create an advisory to stakeholders regarding our proposed actions, including an explanation for why the deviation occurred and how it is being addressed (in accordance with MSC GCR v.2.4.1 Guidance 4.12.2.d). This document represents that advisory.

Why the deviation occurred

The 2nd surveillance eve for the Gulf of Mexico menhaden fishery was the 21st April 2022, while that for the Atlantic menhaden fishery was the 02nd March 2022. According to the 6-month flexibility allowance the 2nd surveillance audit should have been undertaken no later than the 21st October 2022 (Gulf of Mexico fishery) and the 02nd September 2022 (Atlantic menhaden fishery).

However, this did not take place for administrative reasons outside of our control, as follows:

1. The P1 assessor originally assigned to the project became unavailable to take part in the audit, a new one was assigned subsequently but also became unavailable. Finally, a new P1 assessor was eventually assigned. This has delayed the surveillance announcement.
2. A contract agreement was not in place for carrying out the surveillance audit within the allowed timeframe which delayed the surveillance announcement.

How the deviation is being addressed

In order to return the fishery to conformity with the prescribed timeframes and requirements as outlined in the MSC FCP v2.2, the following will take place:

- Global Trust Certification will conduct the combined 2nd surveillance audit of the fishery albeit outside the allowed window.
- The 3rd surveillance audit will take place within 6 months of the 3rd anniversary of the certificate (i.e. no later than the 21st October 2023 (Gulf of Mexico fishery) and the 02nd September 2023 (Atlantic menhaden fishery).
- A total of 4th surveillance audits will still be held during the lifetime of the fishery certificate.

Consequence of the deviation

The deviation will result in the 2nd surveillance being conducted outside of the allowed 6-month window. The level of risk posed by the proposed action is deemed negligible to none as Global Trust Certification can confirm that it is not aware at this time of any factor that could result in the fishery no longer being in compliance with the MSC Fishery Standard. Furthermore, as the fishing season for these fisheries ends on November 1st this will allow the team to collect the latest fishing season information.

Submitted by: Client Services

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