

# MSC Variation Request

## *Tri Marine Atlantic Albacore longline fishery*

### Marine Stewardship Council variation request

**Table 1 – Variation request**

1	Date submitted to the MSC
	July 2, 2021
2	CAB
	SCS Global Services
3	Fishery name and certificate number
	Tri Marine Atlantic Albacore longline fishery
4	Lead auditor or program manager
	Brian Ahlers, Lead Assessor Gabriela Anhalzer, Program Manager
5	Request prepared by
	Brian Ahlers
6	Scheme requirement(s) for which variation requested
	Derogation 3: Covid-19 Fishery and Chain of Custody Remote Auditing
7	How many times has a variation for this requirement been accepted for the same assessment of the same fishery?
	n/a – first attempt

**Table 2 – Variation justification**

1	Proposed variation	
	As permitted through and required by Section 1.3 of Derogation 3: Covid-19 Fishery and Chain of Custody Remote Auditing, SCS wishes to conduct an initial assessment of Tri Marine Atlantic Albacore longline fishery remotely.	
2	Additional time requested	
	Original deadline date	n/a
	Modified deadline date requested	n/a
	Length of additional time requested	n/a
3	Justification	
	The variation is requested to accommodate for travel risks related to Covid-19 and travel restrictions in the countries where part of the assessment team members and based (Australia) and where the site visit would need to take place (Taiwan). The CAB is confident in the capacity and ability for the client, government scientist and management personnel, and RFMO personnel will be able to support a robust assessment remotely.	
4	Implications for assessment	
	The request to conduct the site visit for this assessment remotely presents a few challenges to gather information from relevant site visit participants.  See table 3 below.	
5	Mitigation of the implications for assessment	
	The assessment team has conducted several assessments remotely and with this client on other similar fisheries previously during COVID-19 prior to Derogation 3. Nevertheless, the assessment team will need to conduct additional interviews with relevant scientists and managers, as well as fishing crew to ensure as much evidence is gathered as well.  See table 3 below.	
6	How many conditions does the fishery have and will their progress be affected (positive or negative)?	
	At the moment, the fishery does not have any conditions but we anticipate several conditions with respect to Principal 2 and Principal 3 in particular. Whether this assessment was conduct in-person or remotely, however, the CAB is confident the conditions would be consistent in either scenario. Progress will not be affected.	
7	What is the status of the current assessment or audit?	

	ACDR was announced and ACDR public consultation period is closed.
8	Further comments
	The CAB intended to submit this VR earlier in the process. Thank you for your patience and consideration. No further comments
9	If applicable, additional information added after the MSC's request

**Table 3. Risk Areas, Justification, and Mitigation if applicable.**

Risk Area	Level of Risk	Justification	Mitigation (if high)
Client and stakeholder input	Low	<p>Assessment team has worked diligently to reach out to and accommodate stakeholders, and set aside time to meet with stakeholders as needed.</p> <p>There are ample opportunities and mechanisms to engage with clients and stakeholders including electronic forms of communication, such as videoconferencing phone conferencing, email and phone. The mechanisms are effective in the particular circumstances of the fishery.</p>	n/a
Fishery reports, government documents, stock assessment reports and/or other relevant reports	Low	<p>Fishery reports and other documented evidence that can be used to assess performance against the MSC Fisheries Standard can be easily and transparently checked remotely, due to such information being available publicly, such as being available on the ICCAT website or having been widely distributed and made publicly available to several stakeholders. The reports can be transmitted electronically, and veracity easily confirmed.</p>	n/a

Risk Area	Level of Risk	Justification	Mitigation (if high)
Information appropriate to determination of Principle 1 and Principle 2 information requirements (see Guidance to the MSC Fisheries Standard)	High	Observer reports and port inspections reports will be critical to demonstrate supporting quantitative evidence demonstrating evidence of management measures implemented with respect to shark finning, ETP species interactions, and other concerns and gaps in information identified by the assessment team in the ACDR.	<p>In addition to observer data and logbook data, assessment team will request copies of observer forms (blank copies and populated copies) required for submission as part of the regional observer program, copies of port inspection forms required under Taiwan regulations, copies of Port Inspection Standard Operation Procedures (SOPs) administered by TFA, metrics on personnel and assets deployed for Port Inspections in key landing sites for the UoA, and other supporting documents that are not publicly available with the purpose of gathering as much information as possible to evaluate fishery performance and scoring against the MSC Standard. All information will be submitted electronically via email.</p> <p>In addition, to ensure robust mitigation efforts, the CAB has hired its own interpreter to help facilitate semi-structured interviews with randomly selected fishing masters within the UoA, and randomly selected land-based dock managers where prospective eligible product will be landed to gather additional testimony regarding evidence of implementation of management measures, training of captains and crew, etc. This qualitative information will be triangulated with testimony from TFA, ICCAT, NGO stakeholders, and quantitative evidence submitted to inform scoring, which will be summarized in aggregate in the appendix of the next iteration of the report.</p>
Transparency of management system	High	Though TFA recently launched a new website in English posting non-compliant vessels within the UoA, unlike the WCPFC and other RFMOs, ICCAT lacks some transparency with respect to Monitoring, Control, and Surveillance outcomes and determinations by fishery management, including evidence of sanctions and/or infractions, including response to non-compliance. In addition, little evidence of consultations with industry and other stakeholders is publicly available.	<p>With respect to the Taiwan management regime, assessment team will request documents including copies of internal compliance report determinations within TFA for the Atlantic TW longline fleet. The assessment team will request email records and meeting notes to demonstrate consultation as needed. We are confident that TFA will be forth coming with this information to demonstrate fishery performance accuracy against the MSC Standard.</p> <p>Furthermore, assessment team will conduct interviews with TFA, ICCAT, and other NGOs stakeholders in order to triangulate perceptions and attitudes regarding transparency within the Taiwan/ICCAT management system, and to ensure adequate questions and evidence is</p>

Risk Area	Level of Risk	Justification	Mitigation (if high)
			gathered where information gaps have been identified.
Vessels, gear, and other physical aspect of the fishery	Low	In addition to publicly available description of the UoA, assessment team will gather full description of gear specifications, including ETP species mitigation gear deployed from client directly, which will be cross-referenced through interviews with TFA and ICCAT to ensure adequate confidence in gear and vessel information is gathered to inform the assessment.	n/a

## Template information and copyright

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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](https://www.msc.org) (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](mailto:standards@msc.org)