



Henry Ernst
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Sent by email

Date: 11/11/2021

Subject: Request for variation to the MSC Certification Requirement v2.2 FCP-7.28.23.1 for Compagnie des Pêches Saint Malo and Euronor cod and haddock

Dear Henry Ernst,

I write with reference to your submission on 10/11/2021 of a request for variation to the MSC Certification Requirement (CR) to allow:

The CAB requests and extra 30 days for the submission of a Client Action Plans for the conditions raised at the surveillance audit.

As you are aware, the CR procedures relating to v2.2 FCP-7.28.23.1 state:

If the client has revised the Client Action Plan following surveillance, the CAB shall upload the Surveillance Report to the MSC database within 90 days of completing the audit for publication on the MSC website

These are integral to ensuring all MSC accredited Conformity Assessment Bodies operate in a consistent and transparent manner. The MSC intends that these requirements be met across all fisheries and CoC certificate holders, except in exceptional, well-justified circumstances, as part of the MSC programme.

MSC notes the factors presented supporting your request, including:

- This is the client's first request against this scheme requirement for the fishery.
- The request is for a 30-day extension for the submission of a Client Action Plans.
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- The request is for a 30-day extension for the submission of a Client Action Plans.
- The main justification for the extension relates to delay being caused by new conditions setting and the Client Action Plan.
- This Variation Request is mainly concerned with the conditions raised on PI 1.2.1 and 1.2.2 during the 3th surveillance audit.
- Meeting the conditions raised against PI 1.2.1 and PI 1.2.2 will require changes to the wider management of the target stock.
- External support will thus be required to achieve the milestones detailed in the Client Action Plans and close out the conditions.
- In accordance with clauses 7.19.8 and 1.19.9, the CAB requires evidence of this external support.
- The CAB believes that this support will be forthcoming. The client groups have already started reaching out to their Producer Organisations (POs) and to larger, more influential industry groups to gain their support for the action plans. However, the client groups and POs are currently involved in the end of year negotiations for fisheries agreements on key stocks, which have been complicated by Brexit, and which have resulted in a significant extra workload.
- The CAB thus believes that an extra 30 days will allow the client groups and POs to achieve the required consultation and obtain the support needed for the client action plans.

Given the rationale provided, the MSC is willing to grant a variation to the CR in this case subject to the following conditions:



- The report and client action plans shall be submitted no later than 15 December 2021.
- When requested by the MSC, the CAB can confirm that it is not aware at this time of any factor (related to either fishery status, or performance against conditions) that could result in the fishery no longer being in compliance with the MSC Fisheries Standard

If you have any questions regarding this response, please do not hesitate to contact the relevant Fisheries Assessment Manager for this fishery.

Marine Stewardship Council

cc: Assurance Services International