



Lucia Revenga
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Sent by email

Date: 30/11/2021

Subject: Request for variation to the MSC Certification Requirement v2.2 FCP-7.16.1 for Norway Greenland halibut

Dear Lucia Revenga,

I write with reference to your submission on 22/11/2021 of a request for variation to the MSC Certification Requirement (CR) to allow:

To conduct initial audit as an off-site initial audit.

The CAB proposes that the site visit for this fishery be conducted remotely for the assessment team, as opposed to conducting a fully onsite visit to Norway. Note that Principle experts for P2 and P3 have already participated in the assessment of several other Norwegian MSC certified fisheries for the same client (NFA), including on-site meetings in the past with relevant stakeholders. P1 expert has participated in the full assessment of the same stock in the same fishing grounds for a different client.

As you are aware, the CR procedures relating to v2.2 FCP-7.16.1 state:

The team shall carry out the site visit as planned

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:

In response to COVID-19, the MSC instated Derogation 3 (effective 28 March 2021 to 28 March 2022) which allows on-site audits to be conducted remotely when travel restrictions are in place, or when the health and welfare of those involved in the audit are at risk.

The initial derogation published 2 September 2020 stated that “initial assessments and audits that are to be completed without an on-site visit will require CABs to submit a variation request and risk assessment for approval” and that “if national or local Covid-19 restrictions prevent Conformity Assessment Bodies (CABs), assessors or certificate holders from carrying out on-site audits and assessments of already certified businesses, these may be undertaken remotely.”

Derogation 3 (published 26 February 2021) provided an extension of application to the initial derogation, and stated that it is the responsibility of the CAB to determine whether the following Covid-19 related factors prevent an on-site audit:

- International, national, or local travel restrictions that impact the assessment team or auditor or certificate holder.
- Health risks of conducting an in-person audit/assessment to anyone involved in the audit process.

DNV Business Assurance therefore submit a variation request (as per GCR 4.12) to the MSC to conduct initial assessments remotely (Derogation 3: 1.3b). The following justifications are in place for conducting a remote



site visit as part of the initial assessment:

- Travel restrictions: The fishery is carried out by Norwegian vessels in the Norwegian and Barents Sea. Site visits would require a trip to Norway. Restrictions travel to Norway depend on the country from which assessors travel and on that country's situation over time in relation to the pandemic. Several European countries are at present entering lockdown and it is uncertain what the situation will be at the planned visit date (February 2023).

DNV Business Assurance indicates that a remote activity should not have any implications for the assessment, including its timeline. Notes that the assessment team has previous experience with the fisheries client as well as with the fishery stock. DNV Business Assurance also points out their experience with remote fishery assessments within the derogation period during which the active participation of the stakeholders was provided.

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

- To inform stakeholders of the remote site visit and its scheduled date.
- To document in the assessment announcement and the assessment/audit report the information on the restrictions that have prevented the on-site audit.

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