

Control Union (UK) Limited

**Fukuichi Western and Central Pacific Ocean longline
bigeye, yellowfin and albacore tuna fishery
MSC Variation Request**

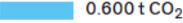
Marine Stewardship Council variation request

Table 1 – Variation request

1	Date submitted to MSC
	28/04/2022
2	CAB
	Control Union (UK) Limited
3	Fishery name and certificate number
	Fukuichi Western and Central Pacific Ocean longline bigeye, yellowfin and albacore tuna fishery – in assessment
4	Lead auditor or program manager
	Henry Ernst
5	Request prepared by
	Henry Ernst
6	Scheme requirement(s) for which variation requested
	FCP v2.2 -7.16 / G7.16 Site Visit: Team Attendance and Derogation 3: Covid-19 Fishery and Chain of Custody Remote Auditing – Requirements and Guidance -1.3b –Submit a variation Request (as per GCR 4.12) to the MSC to conduct initial assessments remotely
7	How many times has a variation for this requirement been accepted for the same assessment of the same fishery?
	No previous VR on this issue for this fishery

Table 2 – Variation justification

1	Proposed variation	
	CU UK proposes to hold the site visit remotely for the initial assessment of this fishery.	
2	Additional time requested	
	Original deadline date	NA
	Modified deadline date requested	NA
	Length of additional time requested	NA
3	Justification	
	<p>CU (UK) shall conduct assessments according to requirements in the Fisheries Certification Process. Where factors listed in 1.1 of Derogation 3 prevent an on-site initial assessment there is a provision to submit a Variation Request to hold the site visit remotely.</p> <p>The travel restrictions into Japan at the time of announcement (and drafting of this VR) require mandatory 3-day quarantine upon entry into the country (https://www.mofa.go.jp/ca/fna/page4e_001053.html - Accessed on 11/04/2022). This represents a significant expense for the client, and a significant time investment for the four team members who would, under normal circumstances, travel for the site visit. As such, there is an unreasonable cost and inconvenience associated with the assessment team travelling to conduct this assessment in the current circumstances.</p> <p>Further to this, some of the team members and their vulnerable family members are considered to be at risk if they were to contract COVID-19. For this reason, it would be desirable to hold the initial audit meetings remotely, to avoid putting team members and their families at risk with travel that could, should this VR be accepted, be avoided.</p>	
4	Implications for assessment	
	<p>The assessment is not likely to be adversely affected by team members participating remotely, as much of the information sought from the team can be obtained via videoconferencing meetings and interviews to cross-check the documentation which has already been reviewed by the team.</p> <p>A potential implication for the assessment is that, without travel, the team is not able to visit the auctions to experience the processes in place when the catch is landed.</p> <p>The assessment timeline will not be affected in any way.</p>	
5	Mitigation of the implication for assessment	
	<p>The Team Leader will ensure that a detailed list of questions is prepared by each team member, and is sent to the client group ahead of time in order to ensure that the remote meetings are prepared for as much as possible, and to ensure targeted thorough initial audit meetings.</p> <p>The Team Leader will also request a flow-of-goods presentation to be prepared by the client representatives in order to understand in great detail the process in place when the catch is landed.</p>	

6	How many conditions does the fishery have and will their progress be affected (positive or negative)?
	This is the first full assessment of this fishery.
7	What is the status of the current assessment?
	Publication of the Announcement Comment Draft Report
8	Further comments
	<p>It is worthwhile noting that by keeping the team offsite, the carbon footprint of this assessment would be significantly reduced. Below is the result of a carbon footprint calculation for a single Economy class return flight from London to Tokyo (https://co2.myclimate.org/en/portfolios?calculation_id=4719134). With team members based in Spain, France, Australia, and French Polynesia, the team’s flights’ carbon footprint would be significantly greater than the average EU citizen’s annual CO2 emissions.</p> <h3>My carbon footprint</h3> <p>My flight</p>  <p>In order to stop climate change, this is the maximum amount of CO₂ that can be generated by a single person in a year</p>  <p>This is the average annual amount of CO₂ generated by a single person in the EU.</p> 
9	If applicable, additional information added after MSC’s request