Harmonisation

Impact assessment report for the Fisheries Certification Process review

November 2021

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FCP IMPACT ASSESSMENT - HARMONISATION

1. IMPACT ASSESSMENT FRAMEWORK

The aim of impact assessment is to provide clear information on the impacts of the options developed to sort out the policy issues identified in the project inception. It serves as a basis for comparing options against one another and against the business-as-usual scenario, and identify a preferred option if possible. It does not replace decision-making but is used as a tool to support the decision-making process and underpin evidenced based decision-making; increasing transparency, making trade-offs visible and reducing bias.

Impact assessment should help to:
- Specify how proposed options will tackle the identified issues and meet objectives
- Identify direct and indirect impacts, and how they occur
- Assess impacts in both qualitative and quantitative terms.
- Help find perverse or unintended consequences before they occur.
- Where possible, make risks and uncertainties known.

This is achieved by following MSC's Impact Assessment Framework that outlines when and how to undertake Impact Assessment. This ensures an efficient, systematic and consistent approach to policy development to underpin a responsive, robust and credible program. In particular, the Impact Assessment Framework defines the different types of impact (see below) and a suite of methodologies best suited to assessing each type.

The impact types used in the Impact Assessment are defined as follows:

Effectiveness: The extent to which the change is deemed likely to be successful in producing the desired results and resolving the issue(s) originally identified.

Acceptability: The extent that the change is considered tolerable or allowable, such that the MSC program is perceived as credible and legitimate by stakeholders.

Feasibility: The practicality of a proposed change and the extent to which a change is likely to be successfully implemented by fisheries within a given setting and time period.

Accessibility & Retention: The extent to which the change affects the ability of fisheries (both currently certified and those potentially entering assessment in the future) to achieve and maintain certification (i.e. changes in scores, conditions and pass rates).

Simplification: The extent to which the change simplifies and does not further complicate the Standard such that it can be easily and consistently understood and applied.

Auditability: The extent to which the change can objectively be assessed by Conformity Assessment Bodies (CABs) and Accreditation Services International (ASI) to determine whether the specified requirements are fulfilled, and CABs can provide scores.

The Impact Assessment report presents the results of this process, whereby each of the options for proposed changes to the Fisheries Standard are tested to understand their potential effects across the six defined impact types.

2. PROBLEM STATEMENT

Under the current Fisheries Certification Process (V2.2), harmonisation activities for different assessments have brought to light several issues with the harmonisation requirements. Additionally, different issues have been raised by Conformity Assessment Bodies and Association of Sustainable Fisheries members.

These identified problems have one overarching theme in that harmonisation causes uncertainty with respect to the outcome of assessments and the duration of harmonisation activities.

When there are multiple overlapping fisheries at different stages in the certification cycle (certified or in-assessment), harmonisation discussions are required every time scoring or rescoring occurs. The requirements are currently unclear when these harmonisation discussions need to be finalised (e.g., at Announcement Comment Draft Report stage, at Client and Peer Review Draft Report stage, or Public Comment Draft Report). This, consequently, leads to unclarity for assessment teams of already certified fisheries about when to integrate changes to the scores of their fisheries as it would either be at the next surveillance audit or an expedited audit needs to be triggered. Triggering an expedited audit before the harmonisation discussions are finalised can lead to unnecessary audit activities if the final scores do not actually require an expedited audit. The additional ambiguity on which assessment team should take the lead in coordinating harmonisation activities results in different approaches by different CABs. Time spent on assessments is further increased by the lack of efficient access to information about scoring elements per fishery assessment making it difficult for assessment teams to identify overlap and consideration of harmonisation. Overall, the ambiguity in the harmonisation requirements, therefore, leads in some cases to uncertainty with respect to the outcome of assessments.

The cause for many of these issues seem to be associated with ambiguity in the harmonisation requirements. This ambiguity has been added intentionally in the past so CABs were less restricted in their movements to address harmonisation activities. However, this ambiguity is now causing problems related to:

- Timing of harmonisation activities, e.g. continuous cycles of harmonisation needed during different assessments and surveillance audits, and the integration of harmonisation outcomes at a later stage in the assessment or after certification.

- Coordination of harmonisation activities, e.g. the level of alignment needed for assessment products or for responding to new information, and the certification status of harmonised fisheries.

The main stakeholders affected by the problem are CABs and fishery clients, although the unexpected nature of harmonisation activities can also affect organisations that deliver information to the assessment teams and stakeholders interested in the outcome of the assessment.

The first Impact Assessment highlighted that the preferred option is to consider annual harmonisation options for addressing the issues around timing and coordination. When introducing annual harmonisation activities, the question arises whether external input should be included during the process. External input can be classified as:

- Stakeholder comments
- Fishery client review comments
- Peer reviewer's comments
- MSC's Technical Oversight
- Findings from ASI

In the current harmonisation process, the content of harmonisation is not always clear to the stakeholders and results of harmonisation activities are only visible in the following report after completion of harmonisation. Moreover, the process for external input is more elaborate for full assessments and not surveillance or expedited audits.

With the current status quo, the growth of the MSC program and increase in fisheries with overlapping elements (e.g., target stocks, primary species, and habitats), harmonisation activities will become more complex and time consuming. There will be a substantial risk that with different assessments at different stages, and the chance for new information at any moment, assessment teams will have to convene for harmonisation on the same element of the involved fisheries at multiple times during the year increasing the unpredictability of certification status.' Complexity and time spent on assessment is further increased by the absence of a database providing a clear overview of fisheries with overlapping elements that require harmonisation.

3. OBJECTIVES

3.1. Overall

The objective of this project is to improve the harmonisation process by decreasing the ambiguity, while at the same time ensuring the process remains efficient, effective and credible. In doing that, the certainty of the harmonisation process with respect to the assessment outcome is improved. The overall intent of harmonisation does not change with this project: "The outcomes of any given UoA's assessment are consistent between overlapping UoAs, in particular, the overall results that are achieved and the setting of conditions".

The objectives are further divided between the timing and coordination harmonisation activities.

3.1.1. Timing of harmonisation activities

The objectives to review the timing of harmonisation activities are:

- Clarify intent on when harmonisation activities need to take place.
- Consider if there should be a maximum duration of the activities and/or one moment per year for the activities.

3.1.2. Coordination of harmonisation activities

The objectives to review the coordination of harmonisation activities are:

- Clarify intent on alignment of assessment products and how to respond to new information because of harmonisation during assessment or after certification.

- Improve achieving similar certification outcomes when assessments are harmonised.

- Clarify intent on how versions of the Standard, and the assessment tree need to be harmonised.

- Review the adequacy of table GPB1 in FCP v2.2 and the definition of 'overlapping fisheries' in the vocabulary.

3.1.3. Accessibility of information on potential overlapping scoring elements

The objectives for accessibility of information on potential overlapping scoring elements are:

- Consider a database that provides a clear overview of scoring elements in certified, suspended and in-assessment fisheries.
- Review the adequacy of the harmonisation section in the Reporting Template and Surveillance Reporting Template with respect to accessibility and transparency.

4. OPTIONS

4.1. Part 1: Annual harmonisation activities options

Following IA0, annual harmonisation was taken forward as the proposed option (see Section 6). After a consultation workshop with Conformity Assessment Bodies, the policy development process that followed involved finessing 'annual harmonisation' into a number of options focused on annual harmonisation.

4.1.1. Option 0: Business as Usual

Under this option nothing will change in the process as currently written in Annex PB of the FCP v2.2. Assessment teams continue to convene harmonisation discussions with other assessment teams when overlapping scoring elements need to be harmonised. This may mean that harmonisation discussions are held at multiple times throughout one assessment each time another fishery starts their assessment or surveillance audit.

4.1.2. Option 1: Annual harmonisation activities for P1

In this option annual harmonisation activities would only be organised for overlapping P1 stocks.

Annual harmonisation
- Only for overlapping P1 stocks
- Time period defined based on one of the following criteria: publication stock advice/management advice/regional/1st site visit
- Event is announced on Track a Fishery
- Event outcomes include condition and timelines (year)
- Trigger expedited audit when new information becomes available that changes certification status (info could get known at site visit of an assessment/audit)
  - If new info changes score that does not change certification status, info can be dealt with at next annual harmonisation event

During full assessment/surveillance audit:
- P2 and P3 harmonisation with current process
- Write Client Action Plan for conditions set at annual harmonisation, milestones are set by year instead of surveillance audits

4.1.3. Option 2: Annual harmonisation activities for set list of stocks and RFMOs

In this option, annual harmonisation activities would only be organised for a set list of stocks and RFMOs defined by MSC and CABs.
Annual harmonisation
- Only for set list of stocks and RFMOs

- Time period defined based on one of the following criteria: publication stock advice/management advice/1st site visit

- Event is announced on Track a Fishery

- Event outcomes include condition and timelines (year)

- Trigger expedited audit when new information becomes available that changes certification status (info could get known at site visit of an assessment/audit)

  o If new info changes score that does not change certification status, info can be dealt with at next annual harmonisation event

During full assessment/surveillance audit:
- Other P1, P2 and P3 harmonisation follows current process

- Write Client Action Plan for conditions set at annual harmonisation, milestones are set by year instead of surveillance audits

4.1.4. Option 3: P1 and P3 annual harmonisation when >3 different fisheries and >1 CAB

In this option, annual harmonisation activities would only be organised for overlapping P1 stocks and P3 when there are more than 3 different fisheries and more than 1 CAB involved.

Annual harmonisation
- Only for P1 and P3, when for >3 different fisheries and >1 different CAB

- CABs to set harmonisation events before 1st audit/assessment of the year

- Time period defined based on one of the following criteria: publication stock advice/management advice/regional/1st site visit

- Event is announced on Track a Fishery

- Event outcomes include condition and timelines (year)

- Trigger expedited audit when new information becomes available that changes certification status (info could get known at site visit of an assessment/audit)

  o If new info changes score that does not change certification status, info can be dealt with at next annual harmonisation event.

- If more than 3 fisheries happen after the 1st audit of overlapping element, annual harmonisation will be following year

During full assessment/surveillance audit:
- P2 harmonisation following current process

- P1 and P3 with current process if <3 different fisheries or 1 CAB

- Write Client Action Plan for conditions set at annual harmonisation, milestones are set by year instead of surveillance audits

4.1.5. Option 4: annual harmonisation possible but not required

In this option, changes are made to the current harmonisation process and conflicting requirements in the FCP that support the option of annual harmonisation activities when CABs want to choose this option.

- CABs are flexible in choosing for annual harmonisation activities – if no new information becomes available, one harmonisation activity will suffice.

- Time period defined based on one of the following criteria: publication stock advice/management advice/regional/1st site visit

- Event is announced on Track a Fishery

- Event outcomes include condition and timelines (year)

- Trigger expedited audit when new information becomes available that changes certification status (info could get known at site visit of an assessment/audit)

  o If new info changes score that does not change certification status, info can be dealt with at next annual harmonisation event.

During full assessment/surveillance audit:

- If annual is not chosen, harmonisation with current process

- Write Client Action Plan for conditions set at annual harmonisation, milestones are set by year instead of surveillance audits

4.2. External input together with annual harmonisation activities process

External input includes stakeholders, fishery client, peer reviewers, MSC, and ASI.

4.2.1. Option 0: Business as usual

- External input during ACDR, site visit, Client and Peer Review Draft Report and PCDR
- CAB response to input is immediate and visible in next report
- Harmonisation is done immediately when needed as a result of external inputs

4.2.2. Option 1: External input during annual harmonisation activities

- External input periods build around annual harmonisation activities, for example stakeholder comment period before harmonisation, and peer review of harmonised scores.
- CAB response is built in around harmonisation activities.

4.2.3. Option 2: External input during normal assessment/surveillance audits, CABs to consider input at next harmonisation activity

- External input period during normal periods - ACDR, site visit, Client and Peer Review Draft Report and PCDR

- CABs consider the input at the annual next harmonisation activity – delayed response

4.3. Accessibility of information on potential overlapping scoring elements

There are some additional changes relating to the production of a harmonisation database that should be considered irrespective of the above options as they can be applied to all. For these changes, the options are:

4.3.1. Option 0: Business as Usual

Under this option nothing will change until the assessment platform is developed. Plans for the assessment platform (Fisheries Assessment Digital Platform) includes accessibility of information on potential overlapping scoring elements and harmonisation activities.

4.3.2. Option 1: Harmonisation Database

A database is developed to provide an overview of Principle 1, Principle 2 and Principle 3 scoring elements of all UoAs in the program making it easier for assessment teams and stakeholders to consider the need for harmonisation activities. This database should not be too technically advanced and expensive as it is intended as an interim solution until such time as the fisheries assessment platform is fully developed and operational. However, as the assessment platform will not be fully operational at the time when the new FCP is published, a simple solution can increase accessibility in the meantime.

5. SUMMARY OF IMPACTS

5.1. Annual harmonisation activities options

5.1.1. Option 0: Business as usual

The main advantage of continuing with the current requirements is that assessment teams are familiar with the harmonisation process as it is. Additionally, requirements whereby assessment team adopt the lowest score where agreement is not reached and some clarifications were added to the FCP v2.1. Continuing with the current requirements will give the MSC Executive time to review the effectiveness of these changes.

The main challenge of business as usual is that the issues and ambiguity remain and could become more persistent with growing number of overlapping fisheries. The growth of the program and increase in the number of fisheries with overlapping scoring elements (e.g. target stocks, primary species, and habitats) may mean that harmonisation activities become more complex and time consuming. There is a risk that with multiple assessments and surveillance audits at different stages in the year, assessment teams may need to convene multiple harmonisation discussions on the same scoring element of the overlapping fisheries at multiple times increasing the uncertainty with respect to the outcome of assessments and duration of harmonisation activities. It may be necessary to publish additional interpretations with respect to the harmonisation process as queries have been received about requirements where MSC's intent is not clear and these need to be clarified for consistent and correct application of the requirements.

5.1.2. Option 1: Annual harmonisation activities for P1

There would be a predictable harmonisation activity in relation to Principle 1 reducing ambiguity, but P2 and P3 harmonisation would be using the current process, which could cause challenges with two concurrent processes as well as limited improvements to the process. Simplification if unlikely to be a result of this change. There would still be associated costs with P2 and P3 harmonisation activities being triggered, as well as expedited audits so benefits to client costs my be restricted. Whilst clarity on the outcomes of P1 harmonisation will improve retention of current fisheries, there is no evidence of benefits for fisheries accessing the programme. Auditability of requirements will improve given specific requirements over the harmonisation of P1, but auditability issues with other principles will remain.

5.1.3. Option 2: Annual harmonisation activities for P1

Maintaining a list of stocks and RFMOs to be harmonised would resolve uncertainty for the list and ensure a predictable harmonisation stage. Stocks and RFMOs that have previously not been considered difficult to harmonise, so are not included in the set list for annual harmonisation may become challenging and would need to be added – which could be resource intensive for the MSC. As with option 1, there would still need to be two different harmonisation processes running concurrently, which could create confusion and limit the acceptability. Uncertainty would be reduced for those PIs on the list, and improve budgeting. Expedited audits would still be an unaccounted cost, and the system itself

would impact how predictable harmonisation would be. Regardless, harmonisation of other principles must still occur. The set list harmonisation would give clarity to clients on the outcomes of their assessment but is unlikely to impact accessibility positively. Simplification impacts are likely to be neutral, and auditability issues will be partly resolved with the clarity surrounding the list.

5.1.4. Option 3: threshold annual harmonisation

Improvements to effectiveness would be limited to when thresholds were met for triggering harmonisation. The use of concurrent harmonisation processes could create confusion and limit the acceptability of the solution. Issues with the current process would persist for when thresholds are not reached. The process would be more predictable but only for when thresholds are met; predicting when those thresholds would be met is harder. A threshold for harmonisation would limit the amount of harmonisation that would take place in a year which would be favoured by clients, but it depends on the system and expedited audits would still be a required additional cost. The solution is likely to improve clarity for fisheries already in the programme but won't impact the accessibility to new fisheries. The FCP may become more complex, with annual harmonisation varying each year depending on the thresholds, and in conjunction with another process for when thresholds are not met. For the same reasons, auditability may be negatively impacted.

5.1.5. Option 4: flexible annual harmonisation

Though the uncertainty over when harmonisation would remain, the limit on the circumstances which would trigger harmonisation will improve the situation, and offer the benefit of a reduction in unexpected harmonisation activities, reducing costs for fisheries clients. This may improve retention but there is no impact on accessibility. The flexibility in the requirements for CABs to organise in a way that works for them will prevent the MSC from being prescriptive but may create some ambiguity in how situations are handled. The improvements to the requirements and clarification of the intent will ensure harmonisation is successful even with different approaches. There will be predictability for those PIs which are harmonised annually. As with every other option, expedited audits remain an unknown entity. This option does not introduce new complex requirements and has the intent of simplifying the process. Auditabilty issues have been reduced through clarification of when harmonisation occurs, but the flexibility may lead to some interpretation.

5.2. External input together with annual harmonisation activities process options

5.2.1. Option 0: business-as-usual:

The current process includes external input at set times and immediate responses and actions from CABs. Stakeholders are not necessarily aware of harmonisation specifics until finalised, which may impact the acceptability of the current process, though complaints about engagement in the process are few. There would not be new expectations around incorporating external input at annual harmonisation which would increase costs and complexity. It is currently clear and auditable at which points external input is considered.

5.2.2. Option 1: External input during annual activities

There would be an increase in the external input which would likely improve acceptability to stakeholders but would increase costs to CABs and fisheries clients. Full external processes would be triggered even if all UoAs were under surveillance. It may increase stakeholder fatigue with multiple requests to provide feedback. There could be confusion over external input processes for annual harmonisation versus normal surveillances or full assessments. There would need to be consideration of who had responsibility for addressing comments when multiple CABs are involved in annual harmonisation.

5.2.3. Option 2: Delayed response

As with business as usual, stakeholders' would not know how their feedback has impacted a harmonisation process. The process would be familiar with the only difference the points at which external input is sought. There may be a level of frustration that time spent feeding into a process does not receive any immediate feedback (unless it triggers an expedited audit), and the situation may have moved on in between submission of information and consideration by the team. Resource and cost savings may occur given that input is predictable, and dealt with collectively once a year. There would need to be revisions made to the FCP to make this feasible and auditable for CABs.

5.3. Accessibility of information on potential overlapping scoring elements

5.3.1. Option 0: Business as usual

The main advantage of business as usual is that it will not require additional resources from the MSC to set up and maintain a database. The MSC is developing an assessment platform that in the future should increase the accessibility of information on potential overlapping scoring elements. On the other hand, business as usual means that limited accessibility of information on potential overlapping scoring elements will remain. Consequently, there is a risk that assessments are inconsistent in their harmonisation activities because CABs have not identified all overlapping scoring elements for harmonisation.

5.3.2. Option 1: Database

This option would be an interim solution until the assessment platform is developed and launched. The main advantage is that a harmonisation database provides assessment teams with a more efficient way to identify overlapping scoring elements that require harmonisation. Additionally, the data in the database can be transferred to the assessment platform once the latter is released.
The main disadvantage of this option is that creating a database means additional costs and time investment for the MSC, while the assessment platform will perform the same function. Thus, the database will be superseded in the future by the assessment platform that is currently being developed.

6. IMPACTS

6.1. Topic 1: Timing of harmonisation activities

6.1.1. Impact assessment analysis

Table 1: Impact assessment for timing of harmonisation.

Impact Types	Description	Option 0 (business-as-usual)	Option 1 (P1 annual harmonisation)	Option 2 (set list annual harmonisation)	Option 3 (threshold annual harmonisation)	Option 4 (flexible annual harmonisation)
Effectiveness	*Is the change effective at meeting the MSC's intent?*	Without a change to the process, the issues of uncertainty on the outcome of and ambiguity within the harmonisation process are not resolved. The current process is not always effective at meeting the core intent of harmonisation: consistency between overlapping fisheries.	The issues would be resolved for uncertainty around the outcome of Principle 1 scoring - the moment of harmonisation is predictable. It would reduce ambiguity around timing of P1 harmonisation. However, not for P2 and P3 harmonisation as these would still use the current harmonisation process. The core intent would be met.	The issues would be resolved for uncertainty around the outcome of the set list harmonised PIs - the moment of harmonisation is predictable. As the set list would include the most problematic harmonisation PIs, it will reduce ambiguity around timing harmonisation for the ones causing the current issues. However, new issues can appear if these are not included on the list since these would still use the current harmonisation	The issues would be resolved for uncertainty around the outcome of threshold harmonised PIs - the moment of harmonisation is predictable. It would reduce ambiguity around timing of harmonisation of these PIs. However, some PIs will still use the current harmonisation process and current issues might persist. The core intent would be met.	For those PIs where CABs choose to harmonise on an annual basis, the uncertainty around the outcome will be decreased. By leaving it open for the CABs to decide, but also that new information still need harmonisation, it could be unpredictable when harmonisation will occur. Thus, ambiguity and uncertainty will remain. However, the requirements that without new information, additional

			process. The core intent would be met.		harmonisation doesn't have to happen until the next year, do clarify the situation. Additionally, there is not necessarily need for a parallel process, it would all fall under the same process. The core intent would be met.
Please state whether you agree/disagree with the following statement: *The option seems effective at resolving the issue(s) consistently and reliably.*	*2 = Disagree*	*3 = Neither agree nor disagree*	*4 = Agree*	*4 = Agree*	*4 = Agree*

| Acceptability | *Is the change acceptable to stakeholders?* | The current process is unclear about when harmonisation is finished, and harmonisation can take place multiple times a year with possible scores and rationales changes. This is confusing for stakeholders. However, the current process is one clear approach. | Having one moment in the year makes it predictable when harmonisation for these PIs take place. However, there will be two different harmonisation processes taking place parallel to each other and this will be seen as confusing. | Having one moment in the year makes it predictable when harmonisation for these PIs take place. However, there will be two different harmonisation processes taking place parallel to each other and this will be seen as confusing. | Having one moment in the year makes it predictable when harmonisation for these PIs take place. However, there will be two different harmonisation processes taking place parallel to each other and this will be seen as confusing. | Without a clear approach to which PIs will be harmonised annually as this depends on the decision by CABs and whether new information becomes available, the process could be seen as confusing and inconsistent. However, CABs will still respond immediately to comments if this includes new information. Additionally, the changes do not require a full change of the process or two parallel processes. |

	Please state whether you agree/disagree with the following statement: *The option seems acceptable to stakeholders*	*3 = Neither agree nor disagree*	*4 = Agree*	*4 = Agree*	*4 = Agree*	*4 = Agree*

| Feasibility | Is the change feasible to fishery partners? | The current process creates uncertainty on the outcome of assessments, and the certification status as harmonisation can take place multiple times per year. This also means that the fishery clients has to pay for harmonisation multiple times a year. | Having one moment of harmonisation for P1 will reduce the uncertainty of the outcome to these PIs which will be welcomed by fishery clients. Not having to harmonise multiple times a year might also mean a reduction in costs. However, this will depend on the system that is set up and how often expedited audits will need to be triggered. Additionally, other harmonisation still needs to take place during the year and might not take away all uncertainty. | Having one moment of harmonisation for a set list of stocks and RFMOs will reduce the uncertainty of the outcome to these PIs which will be welcomed by fishery clients. Not having to harmonise multiple times a year might also mean a reduction in costs. However, this will depend on the system that is set up and how often expedited audits will need to be triggered. Additionally, other harmonisation still needs to take place during the year and might not take away all uncertainty. | Having one moment of harmonisation for threshold PIs will reduce the uncertainty of the outcome to these PIs which will be welcomed by fishery clients. Not having to harmonise multiple times a year might also mean a reduction in costs. However, this will depend on the system that is set up and how often expedited audits will need to be triggered. Additionally, other harmonisation still needs to take place during the year and might not take away all uncertainty. | Not having a predictable system for fishery clients to know which PIs are covered by annual harmonisation can cause confusion and still uncertainty from year to year. However for those PIs that the CAB chooses to harmonise annually, the fishery client will have the certainty on the outcome during that year. Not having to harmonise multiple times a year might also mean a reduction in costs. However, this will depend on the system that is set up and how often expedited audits will need to be triggered. Additionally, other harmonisation still needs to take place during the year and might not take away all uncertainty. |

Please state whether you agree/disagree with the following statement: *The option seems technically feasible for fishery partners*	*2 = Disagree*	*4 = Agree*	*4 = Agree*	*4 = Agree*	*4 = Agree*
Please state whether you agree/disagree with the following statement: *The option seems affordable for fishery partners*	*3 = Neither agree nor disagree*	*4 = Agree*	*4 = Agree*	*4 = Agree*	*4 = Agree*

	Please state whether you agree/disagree with the following statement: *The option seems possible given the management contexts of fishery partners*	4 = Agree	4 = Agree	4 = Agree	4 = Agree	4 = Agree

	Please state whether you agree/disagree with the following statement: *The option seems doable within 5 years for fishery partners*	5 = Completely *agree*	5 = Completely *agree*	5 = Completely *agree*	5 = Completely *agree*	5 = Completely *agree*

Accessibility and retention	*Does the change affect the accessibility and retention of fisheries in the MSC program?*	Due to the current uncertainty for fishery clients over the results of harmonisation, some have mentioned that it could be a reason to not stay with MSC. The current requirements do not seem to form an accessibility barrier.	With clarity for currently fishery clients about the outcome of harmonisation on P1 PIs, it is possible that it positively affects the retention. The changes would not necessarily make the program more accessible.	With clarity for currently fishery clients about the outcome of harmonisation on the set list of PIs, it is possible that it positively affects the retention. The changes would not necessarily make the program more accessible.	With clarity for currently fishery clients about the outcome of harmonisation on threshold PIs, it is possible that it positively affects the retention. The changes would not necessarily make the program more accessible.	Not having a predictable system of annual harmonisation for current and future fishery clients will not positively affect the accessibility and retention, since there is no certainty about the outcome or when harmonisation takes place. But this option will ensure there won't be continuously triggered harmonisation which increases the costs to fishery clients.

	Please state whether you agree/disagree with the following statement: *The option seems accessible to fisheries seeking certification in the future*	*4 = Agree*	*4 = Agree*	*4 = Agree*	*4 = Agree*	*4 = Agree*

	Please state whether you agree/disagree with the following statement: *The option seems accessible to currently certified fisheries*	*3 = Neither agree nor disagree*	*4 = Agree*	*4 = Agree*	*4 = Agree*	*4 = Agree*
Simplification	*Does the change simplify the FCP?*	Keeping the current process will not change anything to the FCP	Having two processes running parallel to each other does not necessarily simplify the FCP. However, to have predictability about when which process will be used is a positive, and might not make it more complex either.	Having two processes running parallel to each other does not necessarily simplify the FCP. However, to have predictability about when which process will be used is a positive, and might not make it more complex either.	Having two processes running parallel to each other does not necessarily simplify the FCP. Additionally, with a threshold, there is a possibility that annual harmonisation changes from year to year. This can make the FCP more complex instead of simplifying it.	This change would require some adaption to current requirements, and a clarification of what constitutes as new information but wouldn't need to have an additional process. This would overall not change a lot to the current process.

	Please state whether you agree/disagree with the following statement: *The option seems to simplify the FCP*	*3 = Neither agree nor disagree*	*3 = Neither agree nor disagree*	*3 = Neither agree nor disagree*	*2 = Disagree*	*4 = Agree*
Auditability	*Is the change auditable by assessors?*	The current process is auditable by assessors, but issues have been noted as to the level and coordination of harmonisation activities.	Having a clear and predictable moment for the harmonisation of some PIs will improve the auditability as it removes some of the issues mentioned by assessors.	Having a clear and predictable moment for the harmonisation of some PIs will improve the auditability as it removes some of the issues mentioned by assessors.	As the list of PIs that need annual harmonisation might change year on year, this change can become problematic and decrease auditability.	Making changes to the current process, and adding clarifications would improve the auditability as it currently is. It does leave it open for CABs to choose this approach, and requires them to coordinate where they think annual harmonisation is a possible option.

	Please state whether you agree/disagree with the following statement: *The option seems to be auditable by CABs*	2 = *Disagree*	4 = *Agree*	4 = *Agree*	2 = *Disagree*	4 = *Agree*

6.2. Part 2: External input together with annual harmonisation activities process options

6.2.1. Impact assessment analysis

Table 2: Analysis of options for external input together with annual harmonisation activities process options

Impact Types	Description	Option 0 (business-as-usual)	Option 1 (External input during annual activities)	Option 2 (Delayed response)
Effectiveness	*Is the change effective at meeting the MSC's intent?*	The current process includes external input at set times and immediate responses and actions from CABs. Stakeholders are not necessarily aware of harmonisation specifics until finalised.	External input would be increased to more moments: during surveillance audits/assessments and then during annual harmonisation. Additionally, all years would include full external input even when all fisheries involved are certified and only have surveillance audits scheduled. Moreover, Stakeholders will be more involved in harmonisation specifics.	External input would be at familiar moments in the process, set times and predictable. Stakeholders are not necessarily aware of harmonisation specifics until finalised.
	Please state whether you agree/disagree with the following statement: *The option seems effective at resolving the issue(s) consistently and reliably.*	*4 = Agree*	*4 = Agree*	*4 = Agree*
Acceptability	*Is the change acceptable to stakeholders?*	At the moment, there is little complaint from stakeholders that they are not directly participating towards harmonisation	This would give stakeholders an opportunity to submit input specifically to harmonisation points. However, it can increase stakeholder fatigue as it is another	To review a response at the moment of annual harmonisation, can make stakeholders frustrated that their comments are not

			point in the process to engage with MSC	immediately actioned, and there is a delay in the response and consequences for the fishery. If circumstances have changed at the time annual harmonisation takes place, it might feel that their previous input was not taken seriously.
	Please state whether you agree/disagree with the following statement: *The option seems acceptable to stakeholders*	*4 = Agree*	*4 = Agree*	*2 = Disagree*

Feasibility	Is the change feasible to fishery partners?	Fishery partners are already used to the current requirements and costs. This would not change. However, with an additional annual harmonisation activity, harmonisation can be triggered multiple times a year if the CAB has to respond to the external input during the assessment or audit. For example, if peer review comments require a score to change that was agreed during annual harmonisation, with the current process, the harmonisation would also be triggered after the peer review.	This will create another moment for fishery clients where they will have to actively engage, but also bear the costs of additional peer review and stakeholder input moments, and changes that are necessary as a result.	The process will remain consistent with the current situation, and therefore will be more predictable with respect to the work that is required from assessors. Moreover, all comments are reviewed and discussed in one harmonisation activity than multiple times during assessments and audits. This can save time and costs for the fishery client.
	Please state whether you agree/disagree with the following statement: *The option seems technically feasible for fishery partners*	*4 = Agree*	*4 = Agree*	*5 = Completely agree*

	Please state whether you agree/disagree with the following statement: *The option seems affordable for fishery partners*	*3 = Neither agree nor disagree*	*2 = Disagree*	*4 = Agree*
	Please state whether you agree/disagree with the following statement: *The option seems possible given the management contexts of fishery partners*	*5 = Completely agree*	*4 = Agree*	*5 = Completely agree*
	Please state whether you agree/disagree with the following statement: *The option seems doable within 5 years for fishery partners*	*5 = Completely agree*	*5 = Completely agree*	*5 = Completely agree*
Accessibility and retention	*Does the change affect the accessibility and retention of fisheries in the MSC program?*	No real change from the current situation	No real change from the current situation	No real change from the current situation

	Please state whether you agree/disagree with the following statement: *The option seems accessible to fisheries seeking certification in the future*	*4 = Agree*	*4 = Agree*	*4 = Agree*
	Please state whether you agree/disagree with the following statement: *The option seems accessible to currently certified fisheries*	*4 = Agree*	*4 = Agree*	*4 = Agree*
Simplification	*Does the change simplify the FCP?*	When annual harmonisation activities are also introduced, it would be possible that following external input during assessment or audits also require harmonisation. This would make the process more complex.	The process will be drawn out over different stages. The input is also in a different context for surveillance/assessment vs. annual harmonisation, and duplication of efforts by external input. It will be confusing for everyone involved.	There will be no additional moments for stakeholder input than in the current process. It will be predictable when comments can be made.
	Please state whether you agree/disagree with the following statement: *The option seems to simplify the FCP*	*2 = Disagree*	*1 = Completely disagree*	*4 = Agree*

Auditability	Is the change auditable by CABs?	When annual harmonisation activities are also introduced, it would be possible that following external input during assessment or audits also require harmonisation. This would make the process more complex.	It will be more complicated to also consider input at the same time as the harmonisation activities. Additionally, it can be unclear who is responsible for responding to comments that are submitted.	Other requirements will need to change to make it possible to not respond immediately to stakeholder comments. There is an additional risk that significant change needs to happen in response to a comment, but that this is delayed until annual harmonisation. However, the expedited audit process would provide a means when the input provides information that would change the certification status of the fisheries involved.
	Please state whether you agree/disagree with the following statement: *The option seems to be auditable by CABs*	*2 = Disagree*	*2 = Disagree*	*4 = Agree*

6.3. Accessibility of information on potential overlapping scoring elements

Table 3: Impact assessment for options relating to the production of a harmonisation database

Impact Types	Description	Option 0 (business-as-usual)	Option 1 (Harmonisation tool)
Effectiveness	*Is the change effective at meeting the MSC's intent?*	The current requirements meet MSC's intent that CABs will have to look for overlapping UoAs for harmonisation.	Introducing an harmonisation tool will increase transparency intent of the MSC, and the possibility for CABs to find overlapping elements of UoAs.
	Please state whether you agree/disagree with the following statement: *The option seems effective at resolving the issue(s) consistently and reliably.*	*3 = Neither agree nor disagree*	*4 = Agree*
Acceptability	*Is the change acceptable to stakeholders?*	BAU is not acceptable for CABs who are experiencing problems in identifying overlapping UoAs	The changes would be acceptable for all stakeholders as it increases transparency
	Please state whether you agree/disagree with the following statement: *The option seems acceptable to stakeholders*	*2 = Disagree*	*4 = Agree*
Feasibility	*Is the change feasible to fishery partners?*	Yes, as it will not change the current procedure	Yes, as it will not change the current procedure
	Please state whether you agree/disagree with the following statement: *The option seems technically feasible for fishery partners*	*4 = Agree*	*4 = Agree*
	Please state whether you agree/disagree with the following statement: *The option seems affordable for fishery partners*	*4 = Agree*	*4 = Agree*
	Please state whether you agree/disagree with the following statement:	*4 = Agree*	*4 = Agree*

	The option seems possible given the management contexts of fishery partners		
	Please state whether you agree/disagree with the following statement: *The option seems doable within 5 years for fishery partners*	*5 = Completely agree*	*5 = Completely agree*
Accessibility and retention	*Does the change affect the accessibility and retention of fisheries in the MSC program?*	No change with business as usual	With a more transparent overview of overlapping harmonisation elements, it could improve accessibility and retention as fisheries know where they stand when entering assessment.
	Please state whether you agree/disagree with the following statement: *The option seems accessible to fisheries seeking certification in the future*	*4 = Agree*	*4 = Agree*
	Please state whether you agree/disagree with the following statement: *The option seems accessible to currently certified fisheries*	*4 = Agree*	*4 = Agree*
Simplification	*Does the change simplify the FCP?*	No change so doesn't necessarily simplify the FCP.	The use of Lloyds tool will simplify the application of the FCP.
	Please state whether you agree/disagree with the following statement: *The option seems to simplify the FCP*	*2 = Disagree*	*4 = Agree*
Auditability	*Is the change auditable by assessors?*	Current requirements are auditable.	Adding the tool will increase the auditability as it increases the oversight of overlapping UoAs.
	Please state whether	*4 = Agree*	*4 = Agree*

	you agree/disagree with the following statement: *The option seems to be auditable by CABs*		

7. ADDITIONAL OPTIONS AND IMPACTS

7.1. Additional options for Topic 1 from IA0

For Topic 1 'timing and coordination of harmonisation activities', two additional options were developed and considered in the initial impact assessment analysis. From the impact assessment analysis, it became apparent that it is likely that these two additional options will not adequately address the issues at hand.

7.1.1. Additional option A: Upgrade of current process

This option will provide more structure and introduce deadlines to the current harmonisation process. It introduces clear requirements for the activities an assessment team will have to follow at each step of the assessment process (e.g., identifying the assessment teams and overlapping UoAs in the Announcement Comment Draft Report). Deadlines are introduced for harmonisation activities to finish before the Client and Peer Review Draft Report. The harmonisation activities only continue if Peer Review, Technical Oversight or ASI comments have been submitted for the harmonised scores and/or conditions. If harmonisation activities start after the Client and Peer Review Draft Report, due to a new assessment starting, the harmonisation results will be considered in either an expedited audit or the next surveillance audit. Surveillance audits and expedited audits will also have a timed amount of limit for harmonisation activities. For all assessments, the assessments teams will have to agree on scores before the end of the deadline or adopt the lowest score as per the current procedure. Requirements will be strengthened to align surveillance audits and site visits to occur around the same time in the year.

7.1.2. Additional option B: Activities triggered by threshold of publication of new information

This option is a variant of the option to have annual harmonisation activities but introducing a threshold to hold harmonisation activities. The harmonisation activities will only be held if new information or changes to the management warrant harmonisation activities. This means that a maximum of one moment for harmonisation activities per year is held, but it is possible that activities do not occur for two or three years until new information is available. The progress on harmonised conditions would not be discussed centrally but tracked per fishery. The current expedited audit requirements are a safeguard for when new information is published at another time than the activities or when the harmonisation activities result in lowering scores that changes the certification status of the UoA.

7.2. Initial Impact Assessment option

IA0 was limited to just two options, business as normal and annual harmonisation. The rationale of annual harmonisation is provided here, and was developed into the further options presented above in Section 3.

7.2.1. Annual harmonisation

This option proposes changes to the harmonisation process and requirements so that harmonisation activities can be conducted within a defined time period once a year, where CABs

coordinate the harmonisation activities per overlapping stock and/or management area. During the annual harmonisation activities, the scoring, conditions and/or progress of conditions are discussed and agreed. The results of these activities are valid until the next annual harmonisation activities, and are published online so that the outcome is clear for all stakeholders. Any assessment or surveillance audit that is held during the year uses the results of the annual harmonisation activities. The current expedited audit requirements are a safeguard for when new information is published at another time than the activities or when the annual harmonisation activities result in lowering scores that changes the certification status of a Unit of Assessment (UoA).

7.3. Impacts of additional options

The results of the impact assessment for the additional options can be found in grey in Table 4 so that it is possible to set them against the options that have been taken forward.

Table 4: Impact assessment for option 0 and option 1 (preferred) taken from IA0. The two additional options discussed in Section 6 are greyed out as they are currently not being considered.

Impact types	Description	Option 0 (business-as-usual)	Option 1 (Annual activities)	Additional option A (Upgrade current process)	Additional option B (Triggered activities)
Effectiveness	*Is the change effective at meeting the MSC's intent?*	Yes, business-as-usual will mean there is a procedure that makes sure that consistent outcomes between overlapping UoAs are being reached. However, harmonisation is possible at all times, whenever a new assessment or surveillance audit starts. So, uncertainty about the certification status and duration of harmonisation	Yes, consistent outcomes between overlapping UoAs will still be reached albeit at one moment a year. This means that for fisheries there is certainty about the duration of harmonisation activities and their certification status following the activities. Progress of harmonised conditions will be discussed every year. However, the outcomes might be aligned at a different	Yes, large part of the current procedure means that consistent outcomes between overlapping UoAs will still be reached. Harmonisation during the assessment process will follow clear guidance and deadlines resulting in a decreased uncertainty about the certification status and duration of harmonisation.	Yes, consistent outcomes between overlapping UoAs will still be reached, but only at times when CABs respond to new information. The progress of conditions will not be discussed in annual harmonisation activities. This means that for fisheries there is certainty about the duration of harmonisation activities and their certification status following the activities.

		remain.	time (e.g. after the assessment).	However, with every new assessment harmonisation activities has to be initiated meaning that there is still a continuous process, and certification status could change at any moment.	
	Please state whether you agree/disagree with the following statement: *The option seems effective at resolving the issue(s) consistently and reliably.*	*1 = Completely disagree*	*4 = Agree*	*2 = Disagree*	*4 = Agree*
Acceptability	*Is the change acceptable to stakeholders?*	No, both CABs and fishery clients have raised issues with business-as-usual. The uncertainty about certification status also affects the reliability for the supply chain on MSC product.	Yes, an option to have only one annual harmonisation activity per year will be acceptable to CABs and fishery clients of overlapping UoAs, as this has been suggested in the past. However, CABs will have to coordinate between themselves, and this might add a complexity, whic	Clearer requirements and deadlines will be accepted by CABs and the fishery clients, but it will not be seen as resolving all the issues. With the chance to have harmonisation discussions at every moment during the year, it also does not resolve the reliability for the supply chain on MSC product.	Yes, to not have harmonisation activities every assessment and year will be welcomed by CABs and fishery clients. This option also increases the reliability for supply chain on MSC product. For NGOs, it probably will not be acceptable that the progress on conditions is not aligned between

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			h could reduce the acceptability to this group. This option also increases the reliability for supply chain on MSC product. NGOs might raise issue with not adequately responding to new information, but this is mitigated by keeping the expedited audit requirements as they are. Knowing when harmonisation activities will occur can increase the preparation for stakeholder to prepare their input. However, peer review and fishery client comments on harmonised scores made during assessments cannot be taken into consideration until the next activities.		fishery clients. NGOs might raise issue with not adequately responding to new information, but this is mitigated by keeping the expedited audit requirements as they are. Knowing when harmonisation activities will occur, can increase the preparation for stakeholder to prepare their input. However, peer review and fishery client comments on harmonised scores made during assessments cannot be taken into consideration until the next activities.
	Please state whether you agree/disagree with the	*1 = Completely disagree*	*4 = Agree*	*2 = Disagree*	*4 = Agree*

	following statement: *The option seems acceptable to stakeholders*				
Feasibility	*Is the change feasible to fishery partners?*	Yes, as it will not change the current procedure.	Yes, it will change the moment of harmonisation to once a year. Fishery clients can forward plan their surveillance audits and reassessments around the date the information will be assessed.	Yes, as it will not add a lot of change to the current procedure.	Yes, it will change the moment of harmonisation to at least once a year. Fishery clients can forward plan their surveillance audits and reassessments around the date the information will be assessed.
	Please state whether you agree/disagree with the following statement: *The option seems technically feasible for fishery partners*	*4 = Agree*	*4 = Agree*	*4 = Agree*	*4 = Agree*
	Please state whether you agree/disagree with the following statement: *The option seems affordable for fishery partners*	*3 = Neither agree nor disagree*	*4 = Agree*	*3 = Neither agree nor disagree*	*4 = Agree*

	Please state whether you agree/disagree with the following statement: *The option seems possible given the management contexts of fishery partners*	*4 = Agree*	*4 = Agree*	*4 = Agree*	*4 = Agree*
	Please state whether you agree/disagree with the following statement: *The option seems doable within 5 years for fishery partners*	*5 = Completely agree*	*5 = Completely agree*	*5 = Completely agree*	*5 = Completely agree*
Accessibility and retention	*Does the change affect the accessibility and retention of fisheries in the MSC program?*	Yes. The uncertainty of the certification status with business-as-usual can reduce the amount of fishery clients that stay in the MSC Program after suspension due to harmonisation. Additionally, new fishery clients might not want to start assessment	Annual harmonisation activities with published outcomes will increase the certainty for incoming fisheries with overlapping UoAs on the score they will receive for particular PIs. Therefore, this option can positively affect accessibility and retention.	If fishery clients do not think this is enough change, they might still think that the uncertainty around the certification status is too high to remain in the MSC Program or start assessment. However, from PCDR onwards, the fishery client knows the results of	Harmonisation activities with published outcomes will increase the certainty for incoming fisheries with overlapping UoAs on the score they will receive for particular PIs. Therefore, this option can positively affect accessibility and retention.

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		if they feel that changes in certification status can be quick due to harmonisation.		harmonisation.	
	Please state whether you agree/disagree with the following statement: *The option seems accessible to fisheries seeking certification in the future*	3 = Neither agree nor disagree	4 = Agree	3 = Neither agree nor disagree	4 = Agree
	Please state whether you agree/disagree with the following statement: *The option seems accessible to currently certified fisheries*	3 = Neither agree nor disagree	4 = Agree	3 = Neither agree nor disagree	4 = Agree
Simplification	*Does the change simplify the FCP?*	No, as there will be no change. Additionally, more interpretation will need to be published to clarify some persistent issues.	Having annual activities might not be simplifying the process with respect to the coordination and organisation of them. Overall, all elements of harmonisation for assessments, P1, P2 and P3 need to be discussed at the	Clarifying current requirements and adding deadlines to harmonisation timelines will simplify the process for CABs to follow.	Having a threshold will complicate the process as somebody will need to be the decision maker on the threshold and then organise the activities. Having these activities might not be simplifying the process with

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		same time. It does simplify the transparency of the process; all parties are aware of when harmonisation takes place and the results.			respect to the coordination and organisation of them. Overall, all elements of harmonisation for assessments, P1, P2 and P3 need to be discussed at the same time. It does simplify the transparency of the process; all parties are aware of when harmonisation takes place and the results.
	Please state whether you agree/disagree with the following statement: *The option seems to simplify the FCP*	*1 = Completely disagree*	*3 = Neither agree nor disagree*	*4 = Agree*	*2 = Disagree*
Auditability	*Is the change auditable by assessors?*	There are a few requirements that have been difficult to audit by ASI.	Having CABs organise annual activities for harmonisation will be auditable by ASI.	Clarifying the ambiguous requirements will increase the auditability. Additionally, deadlines are also auditable by ASI.	Having CABs organise activities for harmonisation will be auditable by ASI.
	Please state whether you agree/disagree with the following statement: *The option seems*	*2 = Disagree*	*4 = Agree*	*4 = Agree*	*4 = Agree*

	to be auditab le by CABs				

7.3.1. Summary of impacts for option A: Upgrade of current process

Clarifying requirements in the harmonisation process and adding deadlines will resolve the immediate issues raised in the MSC Issue Log without introducing rigorous untested changes to the process. The clarifications will increase consistency of the effort that different assessment teams put towards harmonisation, but also the application of the requirements and alignment of audits. By aligning audits, the number of harmonisation activities for overlapping fisheries should also decrease. Adding a deadline for when the harmonisation activities will have to take place and be finished has the advantage for fishery clients and stakeholders that there is a level of certainty at one point in the assessment on whether the fishery fails or becomes certified.

The main disadvantage of this option is that harmonisation is still needed with every assessment, and if initial assessments do start at different times, multiple harmonisation activities are necessary. Therefore, costs or uncertainty for fishery clients would not necessarily be reduced. It is likely that this option will not solve all the issues with the harmonisation process. An additional disadvantage is that with the introduction of a deadline during an assessment, CABs can push to publish the report that would conclude the harmonisation activities if they are aware that an overlapping fishery will start their assessment soon, so that they do not have to engage in a new discussion applicable to the same assessment.

7.3.2. Summary of impacts for option B: Activities triggered by threshold of publication of new information

The main advantage of centralised harmonisation activities is that the score is known for any fishery entering assessment or starting their surveillance audit after the harmonisation activities. This increases the certainty of the certification status. Additionally, the length of assessments of harmonised fisheries will reduce as scores and progress on conditions are already known and do not need to be discussed anymore, which in turn also reduces cost to the fishery. Moreover, costs will be reduced for those overlapping fisheries that will have centralised harmonisation activities more than one year apart.

The main disadvantage of this option is that it is a complete change to the current process, but also that it needs a deciding body who determines if the threshold is met, and this will be difficult to establish. Centralised harmonisation activities that do not necessarily take place annually will make it more complicated to include stakeholder and peer review comments per assessment since any comments related to harmonised scores cannot be taken into consideration until the next harmonisation activities. The annual harmonisation activities will have to combine both Principle 1 as Principle 3 during the same activities to make sure that further activities are not necessary. Furthermore, there will be an imbalance between fisheries that have annual activities as opposed to fisheries that only need harmonisation activities every few years. Additionally, with this option, progress of conditions will not necessarily be harmonised creating a potential inconsistency between assessments.

7.4. Summary of impacts for Annual harmonisation option (in IA0)

The main advantage of annual harmonisation activities is that the score is agreed for any fishery entering assessment or starting their surveillance audit after the harmonisation activities. This increases the certainty with respect to the outcome of assessments and the duration of harmonisation activities. Annual harmonisation activities give the CABs flexibility to align them with meetings of management authorities or publication of stock assessments. Moreover, surveillance audits and full assessments can be aligned to take place after the harmonisation activities. Overall, this can reduce the need for expedited audits. Additionally, the delays within assessments because of harmonisation discussions will reduce as scores and progress on harmonised conditions have already been reviewed, discussed and agreed.

The main challenge of this option is that it may require a significant change to the current process. Additionally, annual harmonisation activities may make it more complicated to include stakeholder and peer review comments per assessment since any comments related to harmonised scores cannot be taken into consideration until the next harmonisation activities. Furthermore, the annual harmonisation activities will have to combine Principle 1, Principle 2 and Principle 3 at the same time to make sure that further harmonisation activities are not necessary. As the CABs will have to coordinate the annual activities, there is a potential for increased complexity to collectively organise the harmonisation activities. All these issues will be explored during the development of this option.

8. DISCUSSION AND CONCLUSION

Option 2 in External Input is the less favourable option, because of the additional burden this would place on CABs and stakeholders to partake in two separate harmonisation activities. Additionally, options 2, 3 & 4 in Process require Option 2 in External Input being in place. There is not an outstanding 'better' option in Process, and whilst Option 3 in External Process is slightly better, the cumulative benefits of Option 5 in Process and Option 1 (business as usual in External Input) together are more advantageous.

Creating a new process for dealing with external input (as required by options 2 & 3), as well as creating the process and list for annual harmonisation options is time consuming; time pressures mean a combination of these options are unfavourable The downside of adopting option 3 in External Input will require further development of requirements, and there are no current issues with the way in which stakeholders engage with harmonisation.

Option 5 in Process is considered the most favourable as strengthening the requirements to ensure new harmonisation cannot be triggered every time a new assessment starts will remove one of the main issues of the current process, whilst retaining flexibility for CABs to run harmonisation in a way that works for them. The definition of 'new information' is appropriate to trigger expedited audits when needed, following a review to ensure it will be appropriate for this new process.

Maintaining business as usual (Option 1) for external input will allow stakeholders to feed into assessments and harmonisation activities as they currently do. In the case that a stakeholder provides comments on harmonisation, guidance has been strengthened on what would constitute further harmonisation discussions between CABs. The flexibility would remain that a CAB could consider stakeholder comments at the next harmonisation discussion, unless expedited audit trigger levels would be met. This combination of options 5 in Process and 1 in External Input will reduce complexity and the two options fit well with each other.

Multiple improvements highlighted by the policy development process have meant the majority of the objectives for the project have been met. The exceptions to this are the revision of Table GBP 1 (PIs to harmonise) and the definition of 'Overlapping UoAs' which will be reviewed in future policy development cycles.

In line with CAB's requests, we are progressing with the development of a harmonisation database as a short term solution ahead of the Fisheries Assessment Digital Platform. This will go through further governance cycles.