Harmonisation

Impact Assessment Report

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1. Purpose

This report presents a summary of the impact assessment undertaken for alternative policy options developed for the project Harmonisation, which is part of the MSC's Fisheries Certification Process (FCP) Review, running alongside the MSC Fisheries Standard Review (FSR).

This report provides a description of the options under consideration at the time of the impact assessment (October 2020-January 2021) and a summary of the likely impacts for each of the different options.

The results of the impact assessment were used to inform the choice of recommended options, which were presented to the MSC's governance bodies in March 2021. This report was also presented as supporting background material.

2. 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.

3. Problem statement

The harmonisation activities of a few key stocks in the last year have brought to light some serious issues with the application of the harmonisation process. The cause for many of these issues seem to be associated with ambiguity in the harmonisation requirements around the timing and coordination 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.

4. Objectives

4.1. 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 objectives are further divided between the timing and coordination harmonisation activities, and the accessibility of information on potential overlapping scoring elements.

4.1.1. Timing and coordination 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.
- 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.

4.1.2. 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 overlapping elements in certified, suspended and in-assessment fisheries.
- Review the adequacy of the harmonisation section in the Reporting Template and Surveillance Reporting Template

5. Options

5.1. Topic 1: Timing and coordination of harmonisation activities

Under Topic 1, both the timing and coordination of harmonisation activities are considered together within the different options because they are interrelated.

5.1.1. 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.

5.1.2. Option 1: Annual harmonisation activities

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).

5.2. Topic 2: Accessibility of information on potential overlapping scoring elements

Topic 2 considers a harmonisation database to support the harmonisation process by increasing the efficiency of identifying overlapping scoring elements and planning harmonisation activities.

5.2.1. Option 0: Business as usual

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

5.2.2. 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.

6. Summary of impacts

6.1. Topic 1: Timing and coordination of harmonisation activities

6.1.1. 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.

6.1.2. Option 1: Annual harmonisation activities

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.

6.2. Topic 2: Accessibility of information on potential overlapping scoring elements

6.2.1. 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.

6.2.2. 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.

7. Impacts

7.1. Topic 1: Timing and coordination of harmonisation activities

7.1.1. Impact assessment analysis

Table 1 shows the impact assessment analysis for option 0 and option 1, together with the two additional options that are currently not being considered (see section 8: Additional options and impacts).

Table 1: Impact assessment for option 0 and option 1 (preferred). 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?* *Please explain your answer and rationale – following the guidelines in Step 4*	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 remain.	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	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. However, with every new assessment harmonisation activities has	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

			aligned at a different time (e.g. after the assessment).	to be initiated meaning that there is still a continuous process, and certification status could change at any moment.	following the activities.
	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?* Please explain your answer and rationale – following the guidelines in Step 4	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, which could reduce the	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 fishery clients.

| | | | | 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. | | 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 following statement: *The option seems acceptable to stakeholders*	*1 = Completely disagree*	*4 = Agree*	*2 = Disagree*	*4 = Agree*
Feasibility	*Is the change feasible to fishery partners?* Please explain your answer and rationale – following the guidelines in Step 4	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	*3 = Neither agree nor disagree*	*4 = Agree*	*3 = Neither agree nor disagree*	*4 = Agree*

	following statement: *The option seems affordable for fishery partners*				
	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	Annual harmonisation activities with published outcomes will increase the certainty for incoming fisheries with overlapping UoAs on the	If fishery clients do not think this is enough change, they might still think that the uncertainty around the certification status is too	Harmonisation activities with published outcomes will increase the certainty for incoming fisheries with overlapping UoAs on the score they will

	Please explain your answer and rationale – following the guidelines in Step 4	MSC Program after suspension due to harmonisation. Additionally, new fishery clients might not want to start assessment if they feel that changes in certification status can be quick due to harmonisation.	score they will receive for particular PIs. Therefore, this option can positively affect accessibility and retention.	high to remain in the MSC Program or start assessment. However, from PCDR onwards, the fishery client knows the results of harmonisation.	receive for particular PIs. Therefore, this option can positively affect accessibility and retention.
	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*	No, as there will be no	Having annual activities	Clarifying current	Having a threshold will

	simplify the FCP? Please explain your answer and rationale – following the guidelines in Step 4	change. Additionally, more interpretation will need to be published to clarify some persistent issues.	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 same time. It does simplify the transparency of the process; all parties are aware of when harmonisation takes place and the results.	requirements and adding deadlines to harmonisation timelines will simplify the process for CABs to follow.	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 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*	*1 = Completely disagree*	*3 = Neither agree nor disagree*	*4 = Agree*	*2 = Disagree*

	simplify the FCP				
Auditability	*Is the change auditable by assessors?* Please explain your answer and rationale – following the guidelines in Step 4	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 to be auditable by CABs*	*2 = Disagree*	*4 = Agree*	*4 = Agree*	*4 = Agree*

7.1.2. Data Analysis of overlapping fisheries for Principle 1 and Principle 3

7.1.2.1. Methods

An overview was created for all UoAs that are certified, suspended or in assessment until 7 October 2020. The UoAs were grouped by fishery name and then by stock to verify harmonisation overlap for Principle 1. Separately, the UoAs were grouped by fishery name and management area to verify harmonisation overlap for Principle 3. Grouping UoAs within fishery assessments is different between Principle 1 and Principle 3. For example, one fishery can have six UoAs for three different stocks but within one management area. In this case, it means there are three grouped UoAs for Principle 1, and one grouped UoA for Principle 3.

By means of sampling of assessment reports of fisheries, every individual stock and management area were given a number to provide further information about the total number of stocks and management areas currently in the program.

7.1.2.2. Outputs overlapping Principle 1 stocks

When considering the UoAs on a target stock level, a total of 349 different target stocks can be distinguished among the certified, suspended or in assessment UoAs. Of these 349 stocks, there are 77 overlapping stocks (see left column in Figure 1). These are stocks that are being assessed in more than one grouped UoA, and therefore need consideration of harmonisation for Principle 1 Performance Indicators.

This means that for 251 grouped UoAs that can be distinguished based on Principle 1 stocks, harmonisation needs to be considered (see right column in Figure 1).
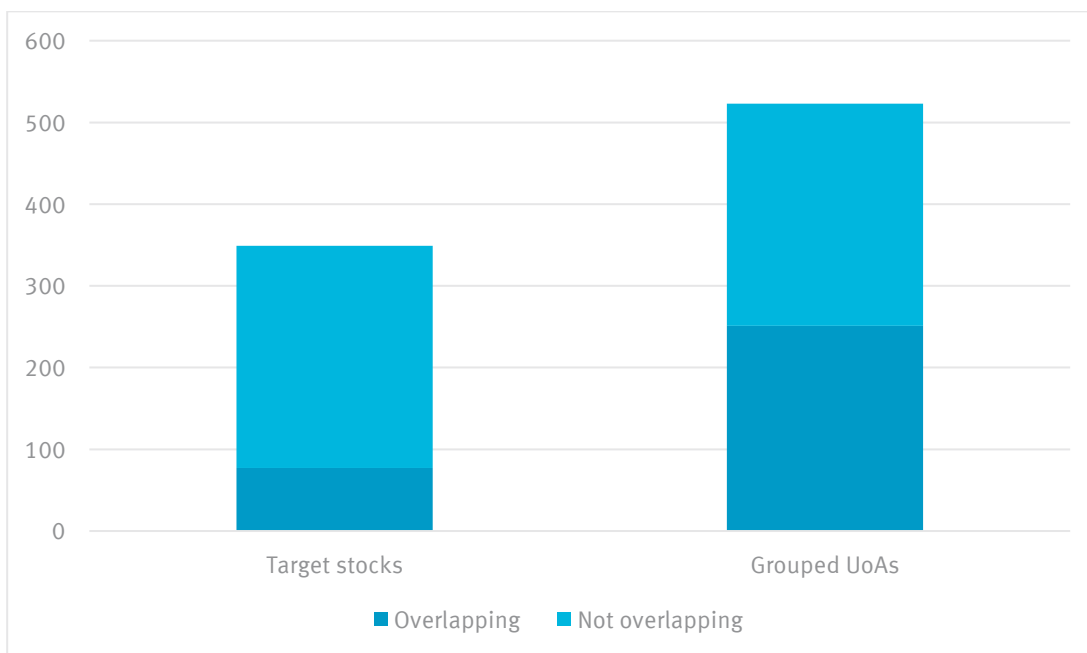
Figure 1: Number of overlapping target stocks against the total number of stocks identified, and separately number of overlapping grouped UoAs against analysed certified, suspended and in assessment UoAs.

7.1.2.3. Outputs overlapping Principle 3 management areas

An estimated total of 105 management areas can be distinguished when analysing the UoAs, of which 40 management areas are being assessed in more than one UoAs grouped by management area (see left column in Figure 2). So, for harmonisation for Principle 3 Performance Indicators needs to be considered for 40 management areas. In practice, this means a consideration of Principle 3 harmonisation for 186 grouped UoAs that can be distinguished based on management areas (see right column in Figure 2).
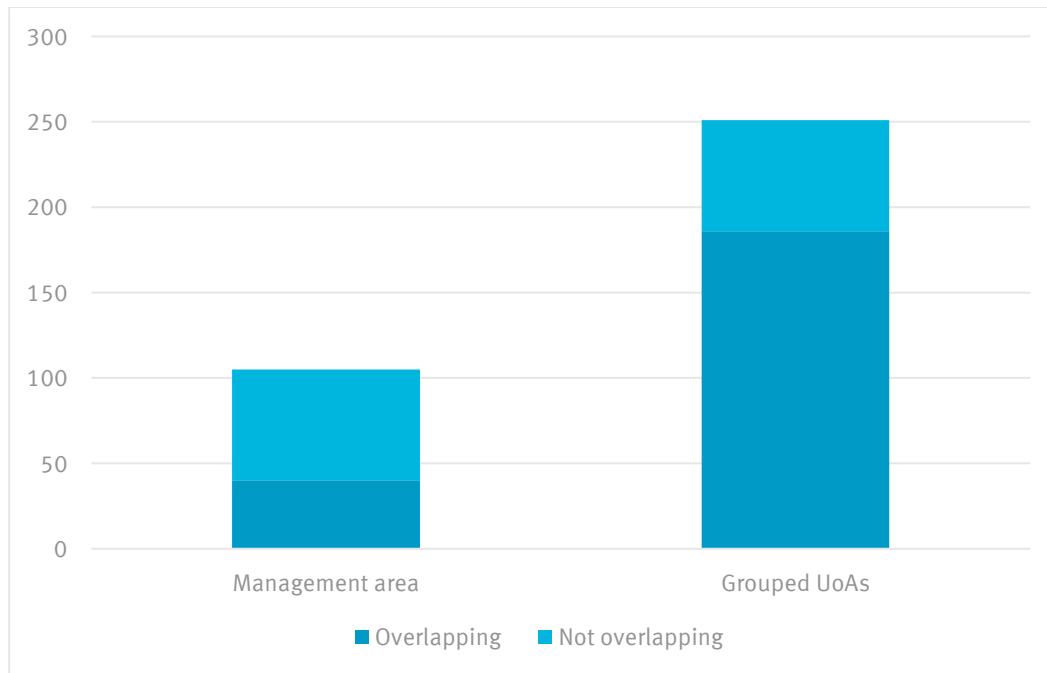
Figure 2: Number of overlapping management areas against the total management areas, and separately number of grouped UoAs against the analysed certified and in assessment UoAs.

7.2. Topic 2: Accessibility of information on potential overlapping scoring elements

7.2.1. Impact assessment analysis

Table 2 shows the impact assessment for option 0 and option 1 that are considered under this topic.

Table 2: Impact Assessment Analysis for option 0 and option 1 within topic 2: Accessibility of information on potential overlapping scoring elements.

Impact Types	Description	Option 0 (business-as-usual)	Option 1 (Harmonisation tool)
Effectiveness	*Is the change effective at meeting the MSC's intent?* Please explain your answer and rationale – following the guidelines in Step 4	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?* Please explain your answer and rationale – following the guidelines in Step 4	Business-as-usual is not acceptable for CABs who are experiencing problems in identifying overlapping UoAs.	The changes would be acceptable to all stakeholders as it increases transparency.
	Please state whether you agree/disagree with the following statement:	*2 = Disagree*	*4 = Agree*

Impact Types	Description	Option 0 (business-as-usual)	Option 1 (Harmonisation tool)
	The option seems acceptable to stakeholders		
Feasibility	*Is the change feasible to fishery partners?* Please explain your answer and rationale – following the guidelines in Step 4	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: *The option seems possible given the management contexts of fishery partners*	*4 = Agree*	*4 = Agree*
	Please state whether you agree/disagree with the following statement:	*5 = Completely agree*	*5 = Completely agree*

Impact Types	Description	Option 0 (business-as-usual)	Option 1 (Harmonisation tool)
	The option seems doable within 5 years for fishery partners		
Accessibility and retention	*Does the change affect the accessibility and retention of fisheries in the MSC program?* Please explain your answer and rationale – following the guidelines in Step 4	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?* Please explain your answer and rationale – following the guidelines in Step 4	No change so does not 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:	*2 = Disagree*	*4 = Agree*

Impact Types	Description	Option 0 (business-as-usual)	Option 1 (Harmonisation tool)
	*The option seems to simplify the FC*P		
Auditability	*Is the change auditable by assessors?* Please explain your answer and rationale – following the guidelines in Step 4	Current requirements are auditable.	Adding the tool will increase the auditability as it increases the oversight of overlapping UoAs.
	Please state whether you agree/disagree with the following statement: *The option seems to be auditable by CABs*	*4 = Agree*	*4 = Agree*

8. Additional options and impacts

8.1. Additional options for Topic 1

For Topic 1 'timing and coordination of harmonisation activities', two additional options were developed and considered in the 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.

8.1.1. 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.

8.1.2. 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.

8.2. Impacts of additional options

The results of the impact assessment for the additional options can be found in grey in Table 1 so that it is possible to set them against the options that have been taken forward.

8.2.1. 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.

8.2.2. 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.

9. Discussion and conclusion

9.1. Topic 1: Timing and coordination of harmonisation activities

9.1.1. Comparison of options

Option 1 revises the harmonisation process to introduce annual harmonisation activities. Although this could change the current process substantially, it has the potential to decrease the uncertainty with respect to the outcome of assessments and duration of harmonisation activities, which have been identified as the current main problem. With CABs collectively organising one moment forannual activities for every overlapping stock and/or overlapping management area, the number of harmonisation activities can be reduced. The option business as usual effectively does not change anything with respect to the existing problems that have been identified.

9.1.2. Next steps

The next step is to hold a targeted CAB workshop to explore how annual harmonisation activities can be operationalised, which could involve a substantial change to the current requirements or the removal of barriers currently blocking CABs from organising these activities. Furthermore, outstanding issues, like stakeholder engagement and peer review, will also be discussed.

As stakeholders have not been informed of the policy proposals yet, the targeted workshop will also serve to gauge the overall support for the option of annual harmonisation activities. With the feedback received at the workshop, requirements will be drafted for the harmonisation process.

9.2. Topic 2: Accessibility of information on potential overlapping scoring elements

9.2.1. Comparison of options

Option 1 develops a harmonisation database, that provides the assessment teams access to a better overview of overlapping scoring elements of assessments. 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.

9.2.2. Next steps

To develop the database, the MSC Executive will internally look at the development, housing and maintenance of such a database. This will be in close coordination with the project team for the assessment platform to ensure that the data in the database can be easily migrated to the platform once this is released.