

## Form 1 – Request for Interpretation or Variance

*This form is for the submission of requests by CABs to ASC to request interpretations of ASC normative requirements and/or requests for variance from specific normative requirements.*

### I CAB Request

1.1 NAME OF CAB	1.2 DATE OF SUBMISSION	1.3 CAB CONTACT PERSON	1.4 EMAIL ADDRESS OF CAB CONTACT PERSON
IMO	16.9.12  Unofficial submissions in Aug/Sept	Michèle Stark	mis@imo.ch
<b>1.5 ASC DOCUMENT REFERENCE</b>			
ASC Farm Certification and Accreditation Requirements_version 1.0_20120314_DEF.PDF			
<b>1.6 BACKGROUND (PROVIDE FULL EXPLANATION OF THE ISSUE)</b>			
<p>For the first determinations/certifications for new standards more time is required by all parties involved (IMO, ASI, ASC) as procedures need to be adapted and interpreted by all as we go along. Therefore, using the date of certification as the first date after which harvested products will be able to enter the ASC COC, may be an unnecessary disadvantage and unfair delay to the compliant company. Usually, certification will be carried out within around 30d of the audit except if the company has outstanding major NCs. In this instance, however, there was delay as all parties involved were going through the first accreditations/certification for pangasius. This is a normal process when a new program starts but is not related to the company's compliance. All non-conformities (NCs) affecting products were closed directly after the audit, two major non-conformities were closed 1<sup>st</sup> July and 30<sup>th</sup> July. Neither NC was affecting the product directly. And both were closed satisfactory, as agreed..</p>			
<b>1.7 RECOMMENDED ACTION/DECISION</b>			
IMO recommends the company should not be penalised for this delay which was not due to any of their own handling and therefore, as an exception, requests the ASC to grant backdating approval of all products harvested after the on-site audit from 30th June 2012.			

### II ASC Determination

<b>2.1 STATUS</b>	<b>2.2 DATE OF ASC DETERMINATION</b>
X <input type="checkbox"/> Closed	18 September 2012
<b>2.3 ASC DETERMINATION ON VARIANCE</b>	
The ASC approves this request for the following farm, owned by Vinh Hoan: Tan Hoa (single site)	
<b>2.3 ASC INTERPRETATION</b>	
Fish as harvested from 30 June 2012 onwards is eligible as ASC certified product and can be claimed as such, provided the traceability was safeguarded by valid Chain of Custody certification by companies which sourced these products and all relevant logo licensing requirements were correctly met.	