Alaska Seafood Marketing Institute -

Standard for Traceability of Alaska Seafood

Version 2, December 2008

Section 1-Responsibility for the Standard

This standard is to be used by suppliers of Alaska Seafood worldwide and by third party auditors evaluating traceability of Alaska Seafood. This standard was developed by the Technical Committee of the Alaska Seafood Marketing Institute (ASMI) and will be reviewed and updated over time as appropriate.

Section 2-Preamble

The objective of this traceability standard is to assure seafood suppliers, distributors, vendors, and consumers that a claim of Alaska origin for a seafood product can be substantiated and documented. This guarantees origin from Alaska fisheries which are managed on the sustained yield principle pursuant to Alaska State Constitutional mandate (Article 8 Section 4), United States Magnuson Stevens Fishery Conservation Act, and in accordance with international norms such as the United Nations Food and Agricultural Organization (FAO) Code of Conduct for Responsible Fisheries (Code).

It is intended this standard provide a high level of assurance that products displaying the Alaska Seafood logo, or claiming Alaska origin, do originate from an Alaska fishery, and such origin can be substantiated, while not causing unnecessary hardship and expense.

All Alaska Seafood processors and their designated agents, suppliers, and distributors who make a claim of Alaska origin, or use the “Alaska Seafood” logo, must subscribe to the requirements of this Standard, and must guarantee traceability of their products to be eligible for use of Alaska origin identifiers. Criteria for use of the ASMI logo are established in the Policy and Procedures of the Alaska Seafood Marketing Institute, and include the requirement that if the ASMI logo is used on packaging, the product must originate in Alaska. Misuse of the Alaska Seafood logo or a false claim of Alaska origin is misbranding under the United States Fair Labeling and Packaging Act (FLPA) Title 15, Chapter 39, #1456. Further, the adoption and use of the corporate seal for Alaska Seafood is established in State of Alaska Statute 16.51.090, and the Alaska Seafood logo is trademarked.

In the United States, the Food and Drug Administration (FDA) regulates misbranding under Section 403, (21 USC 343), and Section 411 (b)(2). In the European Union (EU), geographic origin is protected under EC No. 510/2006. Similarly, Japan addresses misbranding under the Trademark Act, Article 25 and 37(i), and in China under Article 52 of the Trademark Law of the People’s Republic of China.
Section 3-Guaranteed Traceability and Control Systems

As stated in Section 2, all Alaska Seafood suppliers, processors, and distributors must guarantee traceability for Alaska origin. Any entity claiming Alaska origin must have a management system which addresses at a minimum the following elements of traceability:

- **incoming**—knowing (proving) where the incoming materials come from;
- **separation**—keeping Alaska product separate (in space and/or in time) from non-Alaska product at all times;
- **outgoing**—packaging Alaska origin product separately from other products; identifying it as originating from Alaska;
- **labels**—all incoming and outgoing products should bear requisite information;
- **records**—good record keeping of each step in the process (receiving, storing, manufacturing, & shipping).

Such traceability capacity is widely required around the world. The European Union requires food traceability under EU Regulation 178/2002 “Food Law”. Article 18 defines what traceability principles are, and the requirements. Article 19 lays down the general responsibilities for food business operators. In the United States, the requirement for records which are needed to determine the immediate previous sources and the immediate subsequent recipients of food are established in the 2002 Public Health Security and Bioterrorism Preparedness and Response Act, Section 306.

Section 4-Demonstration of Traceability System

Any vendor, purveyor, or buyer of Alaska Seafood at any point in the seafood distribution chain (Figure A), has the right to request demonstration of, and the responsibility to provide, proof of authenticity of a claim of Alaska origin. This proof may be achieved by several means, including affidavits, recall reports, or a customer or 3rd party audit (Figure B).

Signed affidavit. A signed statement from an authorized individual that has responsibility to commit the company may be adequate for some buyer’s assurance that the product they purchase from the company can be guaranteed of Alaska origin.

Customer audit. Many seafood buyers require their own audits for a variety of informational needs. Traceability of product can be one of the elements in customer audits already required by including traceability documentation (example in Table 1 diagram).

Third Party audit. Some seafood buyers require an outside, or 3rd party audit. In general, such audits will examine the same kinds of information as above and that required by law (Figure C).
Section 5 Examples of typical documentation of traceability

Included here are examples of the typical records kept by the Alaska Seafood industry that facilitate documentation of traceability. This section is not intended to be all-inclusive for all Alaska products, but several examples are given.

Example 1. Alaska Pollock with shore side processing from Alaska into the US market. (Table 1)
Example 2. Alaska Pollock with at-sea processing from Alaska into the US market. (Table 2)
Example 3. Alaska product from Alaska to China (secondary processing) and then to other markets. (Figure D)
Example 4. Alaska Salmon fillets processed in Alaska plants (Table 3)
Example 5. Alaska Canned salmon canned in Alaska plants (Table 4)
Product of Alaska origin can be traced from any point in the supply chain ...
How To Demonstrate The Traceability Of Alaska Seafood That You Are Selling

1. Tell the customers that the products originate in Alaska
   - (a) signed affidavit by an individual authorized to represent and commit the company that the products are Alaska-origin, and that the supply chain management conforms to the ASMI Traceability Standard
   - (b) an outline of your traceability protocol, including HACCP, Bio-Terrorism
   - (c) examples of the chain-of-custody of certain products (e.g.- sockeye fillets)
   - (d) the traceability documentation for products that you sell to that customer
   - (e) an internal report of a mock recall exercise
   - (f) an audit by the customer
   - (g) an audit by a 3rd party

2. Offer proof, at whatever level is necessary to reassure your customer; this might be --

3. Prominently feature the Alaska Seafood logo on the products you sell

4. Conform to all requirements of the Alaska Seafood traceability standard

5. Contact ASMI for support and answers
**Figure C Independent Verification is Straightforward**

- **Pre-audit practice:** internal self-review of records, mock recall, etc.
- **Initial review by auditor:** review of systems & operations
- **On-site audit:** detailed, in-person examination of systems, incoming materials, in-plant separation, outgoing products, labels, and records
- **Report of findings:** species, products, risks, systems, records, and monitoring
- **Third-party verification:** letter or other certification from auditor

* - Auditor can be any competent organization, such as an accounting firm, a quality auditor (ISO-9000, 6-Sigma, LEAN, etc.), or a private seafood inspection company

Use Alaska Seafood logo on products and materials
Table 1 Sample Alaska Pollock Shore-side Processing Traceability Process (example)

<table>
<thead>
<tr>
<th>Procedure</th>
<th>Documentary Component</th>
<th>Control Point Responsibility</th>
<th>Describe Chain of Custody Informational Link</th>
<th>Is Product Segregated at this step?</th>
<th>How is it segregated?</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Delivery/Offloading (Certified Input)</td>
<td>ADF&amp;G Fish Ticket</td>
<td>Facility Office Manager or Vessel Purser (as applicable)</td>
<td>ADF&amp;G Fish tickets indicate volume delivered by species and that vessel and fisherman are licensed to fish in Alaska</td>
<td>No</td>
<td>fish separated by species after receiving into facility</td>
</tr>
<tr>
<td>2. Production/Storage</td>
<td>Production Report</td>
<td>Plant Manager, Office Manager and/or Vessel Purser (as applicable)</td>
<td>Describes how much product was produced by species which can be traced back to Fish Ticket/Vessel Delivery Number</td>
<td>Yes</td>
<td>Non-Alaskan Pollock species discarded or run in separate line during production; cases labeled</td>
</tr>
<tr>
<td>3. Facility Shipping</td>
<td>Mate’s Receipt – or – Loading Talley</td>
<td>Plant Manager, Office Manager and/or Vessel Purser (as applicable)</td>
<td>References carrier (mode of transport), product type and volume loaded which can be traced back to Production Report</td>
<td>Yes</td>
<td>Products labeled by species and inventoried</td>
</tr>
<tr>
<td>4. Shipping to the Cold Storage</td>
<td>Bill of Lading/Shipping Manifest</td>
<td>Corporate Logistics/Sales Dept.</td>
<td>References description of product (species) and volume, carrier, port of loading and discharge which can be traced back to Mate’s Receipt or Loading Tally</td>
<td>Yes</td>
<td>Products tagged and stored separately as individual lot</td>
</tr>
<tr>
<td>5. Cold Storage Receiving</td>
<td>Warehouse Receipt/Instorage Note</td>
<td>Corporate Logistics/Sales Dept.</td>
<td>References Shipper, Lot #, description of product (species) which can be reconciled with Shipping Manifests/Bills of Lading</td>
<td>Yes</td>
<td>Products tagged and stored separately as individual lot</td>
</tr>
<tr>
<td>6. Shipping to the Customer</td>
<td>Bills of Lading/Outstorage Note</td>
<td>Corporate Logistics/Sales Dept.</td>
<td>References Lot # and description of product (species) which can be reconciled with Warehouse Receipt</td>
<td>Yes</td>
<td>Products tagged and stored separately as individual lot</td>
</tr>
<tr>
<td>7. Sales</td>
<td>Invoice</td>
<td>Corporate Logistics/Sales Dept.</td>
<td>References description of product (species) which can be reconciled with Warehouse Receipt</td>
<td>Yes</td>
<td>Pulled from previously assigned individual lots</td>
</tr>
</tbody>
</table>
# Table 2 Sample Alaska Pollock At-Sea Processing Traceability Process (example)

**Species**
Alaskan Pollock (*Theragra chalcogramma*)

**Originating Location** (Vessel)

**Product Form**
Fillet Block, Mince Block, Surimi Block, Roe Block, IQF Fillet + Ancillary Products

**Final Location:** Domestic and/or International

## Cold Storage Facility

<table>
<thead>
<tr>
<th>Procedure</th>
<th>Documentary Component</th>
<th>Control Point Responsibility</th>
<th>Describe Traceability Informational Link</th>
<th>Is Product Segregated at this step?</th>
<th>How is it segregated?</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Fishing (Certified Input)</td>
<td>Vessel Tow Log – or NMFS Weekly Report</td>
<td>Vessel Captain, Mate, Plant Manager and/or Purser</td>
<td>Vessel Tow Log/NMFS Weekly Report shows ADF&amp;G statistical area where fish was caught, tow #, overall catch volume and % of catch as Alaskan Pollock (species)</td>
<td>No</td>
<td>fish separated by species after receiving into facility</td>
</tr>
<tr>
<td>2. Production/Vessel Storage</td>
<td>Production Report</td>
<td>Plant Manager and/or Purser</td>
<td>Describes how much product was produced by species which can be traced back to Vessel Tow Log</td>
<td>Yes</td>
<td>Non-Alaskan Pollock species discarded or run in separate line during production; cases labeled</td>
</tr>
<tr>
<td>3. Vessel Offloading</td>
<td>Mate’s Receipt – or – Loading Tally</td>
<td>Vessel Purser</td>
<td>References carrier (mode of transport), product type and volume loaded which can be traced back to Production Report</td>
<td>Yes</td>
<td>Products labeled by species and inventoried</td>
</tr>
<tr>
<td>4. Shipping to the Cold Storage</td>
<td>Bill of Lading/Shipping Manifest</td>
<td>Corporate Logistics/Sales Dept.</td>
<td>References description of product (species) and volume, carrier, port of loading and discharge which can be traced back to Mate’s Receipt or Loading Tally</td>
<td>Yes</td>
<td>Products labeled by species and inventoried</td>
</tr>
<tr>
<td>5. Cold Storage Receiving</td>
<td>Warehouse Receipt/Instorage Note</td>
<td>Corporate Logistics/Sales Dept.</td>
<td>References Shipper, Lot #, description of product (species) which can be reconciled with Shipping Manifests/Bills of Lading</td>
<td>Yes</td>
<td>Products tagged and stored separately as individual lot</td>
</tr>
<tr>
<td>6. Shipping to the Customer</td>
<td>Bill of Lading/Outstorage Note</td>
<td>Corporate Logistics/Sales Dept.</td>
<td>References Lot # and description of product (species) which can be reconciled with Warehouse Receipt</td>
<td>Yes</td>
<td>Products tagged and stored separately as individual lot</td>
</tr>
<tr>
<td>7. Sales</td>
<td>Invoice</td>
<td>Corporate Logistics/Sales Dept.</td>
<td>References description of product (species) which can be reconciled with Warehouse Receipt</td>
<td>Yes</td>
<td>Pulled from previously assigned individual lots</td>
</tr>
</tbody>
</table>
Figure D
Schematic representation: Alaska Product to China for Secondary Processing then to other Markets: Documentation for Traceability

Fishing Vessel
Alaska Waters
FAO Unit 67

ADFG Fish Tickets,
Harvest Points

Alaska Processing Plant
Lot and Production Codes,
Dates

Qingdao, China
2nd Processing Plant
USDC Health
Certification,
Container Number

Plant No.; Lot No.;
Container No.; China
Order No.; (batches can be
increased with additional
Lot numbers)

Chinese Health
Certification No.;
Container No., Plant No.

EU

USA
# TABLE 3-SAMPLE TRACEABILITY DOCUMENTATION (example)

## SHOREPLANTS-MULTIPLE ALASKA LOCATIONS

### SALMON FILLET - ALL SPECIES

<table>
<thead>
<tr>
<th>Procedure</th>
<th>Documentary Component</th>
<th>Information Conveyed</th>
<th>Link to Previous Document</th>
<th>Personnel Responsible for Document Completion</th>
</tr>
</thead>
<tbody>
<tr>
<td>Certified Input</td>
<td>ADF&amp;G Fish Ticket</td>
<td>Date, Tender, Vessel, Fisher, ADF&amp;G Permit No., Area, Caught, Fish Ticket No., Company, Species, Quantity, Weight</td>
<td>Fisheries Certification Number</td>
<td>Company Designated Employee</td>
</tr>
<tr>
<td>Tender Tally for Salmon</td>
<td></td>
<td>Date, Tender, Vessel, Fisher, Statistical Area, Species, Quantity, Weight</td>
<td></td>
<td>Tender Captain</td>
</tr>
<tr>
<td>Production</td>
<td>Processing Weight Up</td>
<td>Date, Vessel, Species, Quantity, Weight</td>
<td>Date, Vessel, Species</td>
<td>Production Manager</td>
</tr>
<tr>
<td></td>
<td>Sheets/Product on Rate</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Dock Tally of H&amp;G destine to Fillet</td>
<td></td>
<td>Date, Species, Description, Area Stored, Est. Weight</td>
<td></td>
<td>Dock Supervisor</td>
</tr>
<tr>
<td>VA Product Tally Form</td>
<td></td>
<td>Date, Start Weight, Finished Weight, Prod./Trans. Order No., Species, Description, FP type, Finish Drag Weight</td>
<td></td>
<td>VA Manager</td>
</tr>
<tr>
<td>Shipping</td>
<td>Packing Manifest</td>
<td>Date, Description, Prod./Trans. Order No., Species, Description, Weight</td>
<td></td>
<td>Boxing Line Drag Freezer</td>
</tr>
<tr>
<td></td>
<td>Van Loading Manifest</td>
<td>Date, Van No, Date Code, Species, Description, Quantity, Weight, Carton Code</td>
<td>Date, Species, Quantity, Weight</td>
<td>Warehouse</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Packing List</td>
<td>Date, Item Code, Species, Description, Quantity, Weight</td>
<td></td>
<td>Warehouse</td>
</tr>
<tr>
<td></td>
<td>Bill of Lading</td>
<td>Date, BL No., Voyage, Barge, Point Of Loading, Point of Discharge, Carrier No., Consignee, Shipper, Transit No., Species, Description, Quantity, Weight</td>
<td></td>
<td>Traffic</td>
</tr>
<tr>
<td>Sales</td>
<td>Invoice</td>
<td></td>
<td></td>
<td>Sales</td>
</tr>
</tbody>
</table>
## TABLE 4

### SAMPLE TRACEABILITY DOCUMENTATION - *SHOREPLANTS ALASKA* (example)

#### CANNED SALMON (ALL SPECIES)

<table>
<thead>
<tr>
<th>Procedure</th>
<th>Documentary Component</th>
<th>Information Conveyed</th>
<th>Link to Previous Document</th>
<th>Personnel Responsible for Document Completion</th>
</tr>
</thead>
<tbody>
<tr>
<td>Certified Input</td>
<td>ADF&amp;GFish Ticket</td>
<td>Date, Tender, Vessel, Fisher, ADF&amp;G Permit No., Area Caught, Fish Ticket No., Company, Species, Quantity, Weight</td>
<td>Fisheries Certification Number</td>
<td>Tender Captain</td>
</tr>
<tr>
<td>Receiving</td>
<td>Tender Summary</td>
<td>Date, Tender/Dock, Vessel, Fish Ticket No., Species, Quantity, Weight, Location of Tender</td>
<td>Tender, Vessel, Fish Ticket No., Species, Quantity, Weight</td>
<td>Tender Captain</td>
</tr>
<tr>
<td></td>
<td>Tender Summary (Dock)</td>
<td></td>
<td></td>
<td>Beach Boss</td>
</tr>
<tr>
<td>Production</td>
<td>Can Line/ Case Up Count Record</td>
<td>Date, Plant Code, Line No., Time, Can Code, Species, Quantity, Weight, Lot No.</td>
<td>Date, Species, Quantity (implies raw material quantity)</td>
<td>QA</td>
</tr>
<tr>
<td>Shipping</td>
<td>Shipping Manifest</td>
<td>Ship Date, Container No./, Seal No., Ship To., Shipper Reference No., Product Code, Species, Description, Pallet No., Can Code, Quantity, Weight</td>
<td>Can Code, Species, Quantity, Weight</td>
<td>Warehouse Database</td>
</tr>
</tbody>
</table>