



ALASKA

RESPONSIBLE FISHERIES MANAGEMENT

(RFM)

Chain of Custody Standard

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Principles of the Process

To become certified as meeting the requirements of the Alaska Responsible Fisheries Management (RFM) Chain of Custody Standard, Applicants shall be able to demonstrate compliance with this Standard, through an independent assessment by an approved Certification Body.

The Certification Body shall be approved and be accredited to ISO 17065 (Conformity assessment-Requirements for bodies certifying products, process and services) by an Accreditation Body who is a member of the International Accreditation Forum. EN45011 / ISO/IEC Guide 65:1996 (General Requirements for Bodies Operating Product Certification Systems) shall be utilized until the transition period for ISO 17065 has expired.

The chosen Certification Body will formulate a contract between the Applicant and the Certification Body detailing the requirements and commitments needed from the Applicant.

The objective of RFM Chain of Custody certification is to provide an assurance to a labeled certified claim on a seafood product that the product originates from a certified 'Responsibly Managed Fishery'.

Where required within the supply chain there will be specific interpretations of the requirements in the RFM Chain of Custody Standard to relate them to specific industry sectors, for example, packing, processing, distribution and selling of seafood products and materials.

Definitions

Chain of Custody (FAO Definition):

*The set of measures which is designed to guarantee that the seafood product put on the market and bearing the ecolabel seal is really a product of designated origin and coming from the certified fishery concerned. These measures thus cover both the tracking/traceability of the product all along the processing, distribution and marketing chain, as well as the proper tracking of the documentation and control of the quantity concerned.*¹

Applicant: A company or multi-site organization in the supply chain that has applied to meet the Alaska RFM Chain of Custody Standard through the formal application form.

Certified Member: An Applicant company or multi-site organization in the supply chain that has been formally certified by the Certification Body as meeting the Alaska RFM Chain of Custody Standard.

Certified Fishery: A fishery that has been independently certified as meeting the “Alaska Responsible Fisheries Management (RFM) Standard”.

Chain of Custody Standard: The list of requirements that the Applicant shall meet to become certified to the Alaska RFM Chain of Custody Standard and /or use the certified claim.

Certified Chain: An Applicant company or group of companies in the supply chain that can demonstrate all certified stages back to the Certified Fishery.

Certified Statement: A statement made by a certified Member approved and licensed for use by the certified fishery representative body.

Ecolabel Seal/Certified Seal: A distinctive logo or statement which certifies that the fish has been sourced from and traceable back to a Certified Fishery.

Chain of Custody Registration Number: An Alaska RFM Chain of Custody Standard certificate registration number issued to each certified Applicant.

Multi-site Organization: An organization that has more than one site under its direct control and applies for certification for these sites. The main processes at each site within the organization will be substantially the same and will be operating to similar methods and procedures.

A Multi-site Organization may be considered as such only if it complies with the following criteria. All sites within the organization:

¹ FAO Guidelines for the Ecolabelling of Fish and Fishery Products from Marine Capture Fisheries, Rome 2005 + 2009

- Shall have a legal or contractual link with a Central Office of the named and designated coordinating organization;
- Shall be subject to a common management system that oversees the traceability operations, which is laid down in a centrally controlled documentation system;
- Shall be subject to continuous surveillance and internal audits by the Central Office of the designated co-ordinating organization.

Single Site: An organization that has one site that applies for certification under this standard.

Stage: A handling / transfer point in the supply chain e.g. Vessel, Packing, Processing, Distribution, Sales.

Subcontractor: A third party or affiliate that is appointed to carry out work for the Applicant (includes contract processors, packers, labeling and any other product processing facilities).

Service provider: A third party or affiliate that is appointed to carry out work for the Applicant (includes contract transportation companies, distribution companies and any other storage facilities).

Outline of the Certification Process

The Alaska RFM Chain of Custody Certification Process is managed by the approved Independent Certification Bodies listed on the ASMI website www.alaskaseafood.org. Applicants are encouraged to contact the Certification Bodies to request information and quotations.

The certification process has a number of distinct stages which are described below.

Stage 1: Information Request

Information may be requested by an Applicant or an affiliated sub-contractor within the Supply Chain. A potential Applicant could be a:

- Processing Vessel / Processing Vessel Group;
- Primary Processor;
- Secondary Processor;
- Trader;
- Market / Retailer / Restaurant.

Applicants may request information from the representative organization or the Certification Body about the certification process, the Standard requirements, the outline costs or timeframes to gain certification.

Applicants are advised to carry out a self-assessment against the standard in order to ascertain their readiness for external assessment.

It is not a requirement for the transport or storage/distribution companies to hold certification to the Alaska RFM Chain of Custody Standard, as these companies are classified as entities within supply chain which do not take physical control or only handle storage and distribution in packaging or containers that prevent tampering with the certified seafood.

Stage 2: Completion of Application Form

Applicants will be requested to formally provide information on their product handling details and their product supply chain to the Certification Body, using the Alaska RFM Chain of Custody application form.

Single units or Multi-site organizations may apply.

When the completed application form is received by the Certification Body the Applicant is allocated a unique Chain of Custody Registration Number.

Stage 3: Certification Body prepares an Assessment Plan

Each Applicant company and its supply chain is different and therefore the Certification Body will create a relevant assessment plan to validate the Chain of Custody for the Applicant's specific product(s) and supply chain.

The Applicant will be required to ensure that they can source product traceable back to the Alaska RFM certified Fishery, from an organization(s) that hold valid Alaska RFM Chain of Custody Certification.

The Certification Body will provide the Applicant with an assessment plan and assessment cost based on the information provided in the application form.

Assessment Plan for Multi-site Organization Applicants**Site Sampling Plan**

The Certification Body shall decide on the site sample plan to be used. For initial or re-certification audits this shall be based on the square root of the total number of sites within scope of the multi-site organization's application. A representative sample of sites will be chosen from the different site activates detailed in the application.

The Certification Body shall perform the initial audit following the initial audit-sampling plan.

The sample size may be increased at any time by the Certification Body. If the sample size is increased a record of the justification for this shall be maintained and communicated to the Applicant.

Following the completion of the initial audit the Certification Body shall make a decision on whether increased or reduced sampling plans are appropriate.

It should be noted that the use of the reduced site sampling plan for subsequent surveillance audits will be justified by performance in the previous audit.

Stage 4: The Assessment

The assessment of the Applicant's facility/facilities is carried out by an independent assessor approved and acting for the Certification Body. The assessment is against the Chain of Custody Standard and in line with the assessment plan.

It is the Applicant's responsibility to ensure that the information supplied in the application form is factual and accurate so that the assessment plan remains relevant.

The Certification Body's assessor will carry out the assessment in an independent, professional and courteous manner.

The key components of the Chain of Custody standard include the requirements for:

- A Product Identity System;
- A Traceability System;
- A Segregation System.

The Alaska RFM Chain of Custody Standard will require specific interpretations of the clauses by the assessor to ensure they relate accurately to different sectors including packing, processing, distribution and selling of seafood products and materials.

Stage 5: The Assessment Report

During the assessment the assessor will compile an assessment report describing how the Applicant does/does not meet the Chain of Custody Standard.

The assessment report will identify any non-conformities against the Chain of Custody Standard. Applicants will be required to close out non-conformities through corrective actions. Full details as to what constitutes a non-conformance can be located in QP4 section 7.2 (<http://certification.alaskaseafood.org/certification>)

Stage 6: The Certification Decision

The Applicant's assessment report and any necessary corrective actions will be submitted to a certification committee for a certification decision.

The certification committee is composed of persons with equal competence to the assessor and with expertise in certification.

Stage 7: Certification

Where certification is the outcome, Applicants shall be notified within 10 days of the certification decision. Following this notification a Certificate of Approval will be issued to the Applicant.

The certificate remains the property of the Certification Body and the control and management of the status of a Certificate shall be in place.

Certificates are valid for three years with annual surveillance. On-going certification is maintained where there is substantive and demonstrable evidence that the Applicant remains in compliance with the criteria of the Standard. Any non-conformity raised shall be verified as closed, with objective evidence within defined timescales. Full details of required time scales are located in QP4 section 9 (<http://certification.alaskaseafood.org/certification>)

The Applicant will be awarded certification for its facility if it meets the Chain of Custody Standard.

Stage 8: Access to Certified Seal/Statement

Certified Members can apply to certified fishery representative body for the use of the certified seal/statement.

Only when Applicants gain certification to the Alaska RFM Chain of Custody Standard can they then apply to the certified fishery representative body to use the certification seal / statement.

Appeals

The Applicant has the right to appeal the certification decision of the Certification Body. Appeals shall be made in writing within seven days of the certification decision.

A full response will be given by a Certification Body manager independent of the assessor and certification committee.

Chain of Custody Standard Requirements

This Standard details the set of requirements that shall be certified as being in place to ensure that the seafood product put on the market and bearing the ecolabel seal is really a product of designated origin and coming from the certified fishery concerned. These measures thus cover both the tracking/traceability of the product all along the processing, distribution and marketing chain, as well as the proper tracking of the documentation and control of the quantity concerned.²

1.0 General Principles of Traceability for Chain of Custody

- 1.1 The Applicant shall have a documented policy to state that it is committed to the Chain of Custody Standard.
- 1.2 Only Seafood products that originate from a certified responsibly managed fishery shall carry the official certified seal/statement.
- 1.3 All Seafood products carrying the official certified seal/statement shall be readily identifiable and where necessary kept clearly separated from products sourced from non-certified fisheries at all times.
- 1.4 Traceability systems shall be in operation that can identify and trace certified labeled seafood products back to the certified incoming product and to the certified fishery.
- 1.5 Identification coding shall be in place in the Applicant's facility to enable effective identification of certified product throughout the process from receipt to dispatch.
- 1.6 The Applicant shall demonstrate compliance with the applicable national/federal and/or regional/state regulations on labeling and traceability.
- 1.7 Where certified labeled product and non-certified product are either,
 - a) transported together to and from the site or;
 - b) in third party storage.the Applicant shall have a system in operation to ensure appropriate segregation is provided.
- 1.8 Where an Applicant utilizes the services of a subcontractor (carrying out contract processing, packing or labelling activities), the subcontractor shall be certified to the RFM Chain of Custody Standard.
- 1.9 Where an Applicant utilizes the services of third party service providers shall a contract or equivalent documentary evidence shall be in place demonstrating that product traceability and tamper proofing are ensured during storage, distribution or transportation.

² FAO Guidelines for the Ecolabelling of Fish and Fishery Products from Marine Capture Fisheries, Rome 2005 +2009

2.0 Traceability within the Supply Chain

2.1 Each seafood consignment shall be traceable back to the certified fishery and should have the following minimum information available:

- Species name;
- Catch area.

2.2 Certified incoming products shall be kept separate from non-certified incoming products throughout seafood processing, distribution and marketing if they are to carry the official certified seal/statement. This may be achieved by:

- Physical separation;
- Temporal separation.

2.3 Where certified and non-certified seafood is mixed the final product is not eligible for carrying the official certified seal/statement with the following exception:

For compound products including ready meals, these may contain non-certified seafood ingredients within the final product where the non-certified seafood ingredients shall be 5% or less by weight of the total seafood ingredients in the final product.

2.4 When an Applicant sells/markets any product or batch of products as originating from a certified fishery the Applicant shall operate a system that verifies through documentation the traceability of the product.

2.5 The Applicant shall have a documented product retrieval/recall procedure in operation which includes the requirement that the Certification Body that shall be notified in the event of a certified product being retrieved.

2.6 The product retrieval system shall be:

- activated if non-conforming product is released into the supply chain;
- tested annually with documented results retained for inspection.

3.0 Traceability and Labelling

- 3.1 The Applicant shall test the traceability system across the range of RFM Chain of Custody certified products to ensure traceability can be determined from incoming product to finished product and vice versa. This shall:
- be carried out at least annually;
 - include a quantity check/mass balance;
 - traceability challenge (backwards and forwards);
 - be documented and the results shall be retained for inspection.
- 3.2 Documentation shall be available that verifies the identity of the certified seafood as originating from a certified fishery.
- 3.3 Certified seafood products shall be labeled or otherwise be identified in a manner that ensures traceability is maintained from receipt, during intake, rework, work in progress packaging, storage, dispatch, handling and delivery.
- 3.4 The Applicant shall be able to track and trace the certified product one step forward and back to the certified fishery.
- 3.5 Each certified product shall be labeled with all necessary information which is appropriate for the Applicant's stage in the supply chain. As a guide, this may include the following, although this is not an exhaustive list:
- Commercial species name;
 - Country of origin;
 - Fishing/catch area;
 - Product description;
 - Product code or production code number.
- 3.6 Each outgoing batch/lot of certified seafood product shall be identified as Alaska RFM certified on product packaging or associated documentation (e.g sales invoice, dispatch documentation).
- 3.7 The Applicant shall operate a secure system for the production, storage and application of product labels bearing the certified seal/statement, to ensure only certified product is labeled as such.
- 3.8 A record of all certified incoming product shall be maintained, showing the name of the supplier, the suppliers unique Chain of Custody or Fishery registration number, evidence of the supplier's Alaska RFM Chain of Custody certificate validity, and sufficient other details to allow the tracing of the incoming product back to the supplier and the certified fishery.
- 3.9 All traceability records shall be kept for a reasonable period to correspond with the shelf life of the product, with a minimum of 3 years. Traceability records shall be accurate, legible and unadulterated.

- 3.10 The Applicant shall have a documented procedure for handling non-conformities to this standard. Records of non-conformities shall include:
- Clearly documented details of the non-conformity;
 - Identification of the person responsible for addressing non-conformity;
 - Clearly documented corrective action;
 - Documented time-scale for correction;
 - Documented verification that the corrective action has been implemented and the non-conformity closed.
- 3.11 Corrective actions plans shall be accurately documented; identifying authorized responsible personnel and with specified time limits to complete the plan.
- 3.12 The Applicant should keep a documented record of customer complaints or feedback concerning the labeled certified product.

Multi-Site Chain of Custody Standard Requirements

This section details the set of requirements that shall be certified as being in place where the Applicant is a multi-site organization; these requirements apply to the designated central office.

Organizational Integrity

- 1.0 The multi-site organization shall either be:
 - a legal entity with direct control over the sites and that takes ownership of the certified product or;
 - have a signed contractual agreement between the central office and each member site that is included in the application.
- 2.0 There shall be a documented company policy stating the organization's commitment to the RFM Chain of Custody Standard.
- 2.1 There shall be documented evidence to demonstrate that this policy has been communicated to all the Chain of Custody member sites within the multi-site organization.
- 3.0 There shall be a documented organizational structure showing relevant positions, and their interrelationship/ responsibilities with respect to the Alaska RFM Chain of Custody Standard.
- 3.1 There shall be a designated appropriately trained person within the organization who is accountable and responsible for co-ordinating multi-site chain of custody activities to ensure they meet the requirements of the Alaska RFM Chain of Custody Standard.
- 4.0 Where a multi-site organization utilizes the services of a subcontractor (carrying out contract processing, packing or labelling activities), the subcontractor shall be certified to the RFM Chain of Custody Standard.
- 4.1 Where a multi-site organization utilizes the services of third party service providers shall a contract or equivalent documentary evidence shall be in place demonstrating that product traceability and tamper proofing are ensured during storage, distribution or transportation.
- 4.2 Each outgoing batch/lot of certified seafood product sold outside the multi-site organization shall be identified as Alaska RFM certified on product packaging or associated documentation (e.g sales invoice, dispatch documentation).

Management of Members

- 5.0 The multi-site organization shall have a register of all sites included under its control/contractual agreement which details:
- Name of Each Site;
 - Full Address (physical and postal);
 - Contact details (phone/email);
 - Product Handled;
 - Date of last Internal Audit and Result.
- 5.1 The Certification Body shall be formally informed of the addition of any new sites to the multi-site organization within 10 working days of registration.
- 5.1.1 The new additional site shall have received an internal audit to the Alaska RFM Chain of Custody Standard and there shall be no outstanding non-conformances before the site is added to the member site register.
- 5.2 The Certification Body shall be formally notified of the removal of any site from the member site register within 10 working days of withdrawal.

Central Office Control

- 6.0 The central office shall demonstrate its ability to collect and analyze data from all member sites including itself. There shall be a documented annual management review meeting covering:
- System documentation and system changes;
 - Review of multi-site organizations compliance to the standard
 - Complaints;
 - Evaluation of corrective actions;
 - Internal audit planning and evaluation of the results;
 - Different legal requirements.
- 7.0 The Applicant shall have a documented procedure for handling non-conformities to this standard. Records of non-conformances shall include:
- Clearly documented details of the non-conformity;
 - Identification of the responsible person assessing non-conformity;
 - Clearly documented corrective action;
 - Documented time-scale for correction;
 - Documented verification that the corrective action has been implemented and the non-conformity closed.
- 7.1 Corrective actions plans shall be accurately documented; identifying authorized responsible personnel and with specified time limits to complete the plan.
- 8.0 There shall be an internal audit plan, checklist and schedule available to cover the central office and member sites.
- 8.1 Internal audits of the member site and central office shall be carried out at least annually and prior to application for multi-site certification.

- 8.2 Internal auditors shall be suitably trained and independent of the area being audited.
- 8.3 All records of the internal audit plan, audit findings and follow up of corrective actions resulting from an internal audit shall be maintained and available.
- 9.0 There shall be a documented procedure for the identification of certified products to enable traceability of all certified product to the applicable sites.
- 9.1 There shall be evidence that central office tests the traceability system across the multi-site organization for the range of Alaska RFM Chain of Custody certified products to ensure traceability can be determined from incoming product to finished product and vice versa. This shall:
- be carried out at least annually;
 - include a quantity check/mass balance;
 - traceability challenge (backwards and forwards);
 - be documented and the results shall be retained for inspection.
- 10.0 All traceability records shall be kept for a reasonable period to correspond with the shelf life of the product, with a minimum of 3 years. Traceability records shall be accurate, legible and unadulterated.