



RFM Procedure 2: Application to Certification

Procedures: Fishery Standard

*Alaska Responsible Fisheries Management (RFM)
Certification Program
17065*

Table of Contents

1. Purpose	4
2. Scope	4
3. Application to Certification: Outline Procedure	4
3.1 Inquiries and Applications	4
3.2 Application Review	5
3.3 Application Validation	6
3.3.1 Application Validation (continued)	8
3.4 Validation Assessor(s)	9
3.5 Assessment Validation Report	9
3.6 Initial Full Assessment	10
3.7 Assessment Team Verification	11
3.8 Assessment Team training, briefing, coordination and defining specific roles	11
3.9 Assessment Plan	12
3.10 On-Site Assessment and Engagement	14
3.11 Desktop review and analysis of information	14
3.11.1 Desktop review and analysis of information (continued)	15
3.12 On-site Fishery Assessment	15
3.13 Assessment Method	16
3.14 Confidence Ratings and Assignment of Non Conformances	17
3.15 Requests for Clarification	20
3.16 Corrective Actions	20
3.17 Peer Review	21
3.18 Assessment Report Contents	22
3.19 Public Comment Period	23
3.20 The Certification Committee Stage	23
3.21 Certification Decision	23
3.22 Notification of Certification Decision	24
3.23 Complaints and Appeals	24

Procedure 2: Application to Certification Procedures for the Alaska RFM Fishery Standard

3.24 Certificate Issue.....	24
4. Fishery Surveillance Audits.....	25
4.1 Arranging Surveillance Audits	25
4.2 Surveillance Audit Focus	26
4.3 Desktop Review	26
4.4 On-site Audit.....	26
4.5 Surveillance Assessment Report	27
4.6 Assessing progress against corrective action plans and observations.....	28
4.7 Suspension or withdrawal of Certificate.....	29
4.8 Certification files	30
5. Transfer of Certification Bodies.....	31

1. Purpose

This document defines the procedures required by all fishery applicants wishing to apply for certification to the Alaska RFM Fishery Standard. These procedures ensure that all applicants are handled in a consistent, professional, and equitable manner. These procedures offer Certification Bodies a format that can be used wholly or incorporated into existing Certification Body procedures.

2. Scope

This document sets out the procedures for fishery assessments and awarding certificates against the Alaska RFM Program. It covers applications for certification under the Alaska RFM Program, commissioning of initial audits, notification of results to relevant parties, and surveillance activity.

The current RFM Fishery Standard is available on the ASMI website:

Hereinafter referenced as “RFM Fishery Standard.”

A ‘Guidance To Scoring’ has also been created which shall be used by Certification Bodies to ensure consistency.

The current RFM Scoring Guidance is available on the ASMI website.

3. Application to Certification: Outline Procedure

3.1 Inquiries and Applications

Upon receipt of an inquiry to an accredited and ‘ASMI approved’ Certification Body for certification of an eligible fishery to the Alaska RFM Program, the Certification Body Program Manager or Administrator will contact the applicant directly to discuss full details of the application including:

- a) The applicant group details;
- b) Unit of certification;
- c) Target species;
- d) Geographic regions covered;
- e) Catch methods/gear type;
- f) Principal management authority; and
- g) Certification timeframe.

Procedure 2: Application to Certification Procedures for the Alaska RFM Fishery Standard

These details will be recorded and agreed upon by the applicant and the Certification Body Program Manager or Administrator.

The RFM Program is built on the principle of ‘One Fishery, One Certificate’, if a client wishes to split a fishery into multiple certificates then this must be agreed by the ASMI Board before the Certification Body can agree with this request.

The Certification Body Program Manager or Administrator will then forward an information pack, which will include the following documents:

- a) An Alaska RFM Program Application Form;
- b) Certification Body Regulations;
- c) A copy of the relevant Alaska RFM Program documentation;
- d) Quotation for audit and estimated travel costs.

Upon receipt of an initial fishery application to an accredited and approved Certification Body in the RFM program, the application is allocated the next sequential membership number and the applicant’s details entered in the relevant Certification Body database.

Only signed applications received on the official CB application with the appropriate application and agreed payment schedule will be processed.

The signed application acts as a contract between the applicant and a Certification Body confirming the applicant’s commitment to abide by the relevant rules, regulations, and standards.

An individual file is established for each applicant showing the applicant’s name, address, and membership number. The application form is maintained in the applicant’s file.

3.2 Application Review

The Certification Body shall review the application of an applicant fishery to ensure that the Certification Body has the capacity and resources to carry out the assessment of the subject fishery and that the applicant has been fully briefed on the expected or anticipated timeframe of evaluation. This review shall be documented.

3.2.1 Certificate Sharing

The RFM program requires the certification body to incorporate the following into the CB/Client contract.

Certificate sharing is required in order to:

- (1) prevent redundant assessments and associated burden on fishery participants and managers;
- (2) encourage use of the program by allowing all eligible fishery participants to opt into the certification process and access fishery certificates; and
- (3) ensure that the program reduces barriers to free trade and fosters market access.

Certificate sharing mechanisms are established and made publicly available by the client group and shall include cost sharing provisions which shall be applied fairly and equitably across all participants. Cost sharing shall be limited to costs associated with obtaining and maintaining certification, including

- direct costs paid by the client group to a certification body,
- direct costs incurred by the client in managing or facilitating the assessment, and
- cost of the client's time spent managing or facilitating the assessment, reassessment, and/or annual audit process.

Upon application by a fishery participant to a client group to access certificate sharing pursuant to the cost sharing measures specified by the client group, the client group shall have 10 working days to provide the applicant access to the certificate subject to the applicable cost sharing arrangements. Failure by the client group to provide timely access to the certificate shall result in withdrawal of the certificate by the Certification Body. Failure by the applicant to meet cost sharing requirements shall void their application and relieve the client group of the requirement to share certificate with the applicant for a period of two years. If a participant in the current certificate does not meet its cost sharing obligations, the client group may inform the CB to remove the non-paying participant from the certification.

3.3 Application Validation

Application Validation evaluations are only conducted before Initial Assessments and are managed under the direction of the Certification Body Program Manager.

The purpose of the evaluation is to validate the application and to establish the feasibility of the unit of certification requested through desktop and on-site

Procedure 2: Application to Certification Procedures for the Alaska RFM Fishery Standard

assessment. The output is a confidential Assessment Validation Report that documents the history and current status of the fishery and the applicant's details, and reviews the general consistency of the fishery management against the Alaska RFM Fishery Standard's fundamental clauses **(1-13, or for enhanced fisheries clauses 1 -14)**. The Validation Report is an optional choice and the client may decide to skip it and go directly into full assessment.

Objective:

The primary objective of the Application Validation evaluation is to gather information that supports the initial appraisal of the fishery. The Assessment Validation Report is not intended to capture and assess all information required to carry out a full evaluation, but it is meant to provide confidence that sufficient evidence is available to allow a full assessment to take place. There are several outcome-based objectives of the initial site visit plan:

- a) Confirm and document the organizational structure of the fisheries management entities involved in the fishery;
- b) Confirm and document the proposed Unit of Certification, management bodies, species, and geographic location of fisheries, gear types, and seasons. This information is used to assess and confirm the practicalities and feasibility of the assessment;
- c) Provide an opportunity to explain and clarify the main parts of the assessment process, the broad assessment timelines, and the Certification Body's contact point for information transfer to management organizations and fishery participants.
- d) Gather information on, and confirm broad management functions and activities, with respect to the RFM Fishery Standard fundamental clauses **(1-13 or, for enhanced fisheries, 1-14)**.

Validation Method:

Assessment Validation evaluations are led and arranged by the Certification Body Program Manager and, where relevant, are allocated an experienced team of approved assessors with relevant knowledge and expertise for the given scope.

An on-site visit to the fishery may be required during Assessment Validation where direct discussion with the applicant and fishery management organizations is necessary to validate information. Site visit dates and schedules are organized by an approved assessor with agreement with the applicant and fishery management organizations. Confirmation of the site visit plan and agenda is provided to each entity involved.

Procedure 2: Application to Certification Procedures for the Alaska RFM Fishery Standard

Overseas travel arrangements, including flights, hotels, and car rental, as required, will normally be organized by the Certification Body Program Manager/Administrator in discussion with the Assessor/s and applicant.

3.3.1 Application Validation

Validation Method:

The Certification Body shall inform the applicant of the purpose and objectives of the Assessment Validation process. The objectives of the Assessment Validation process are as follows:

- a) To understand the fishery in the context of the RFM Fishery Standard;
- b) To focus the Certification Body's planning for the full assessment; and
- c) To inform the applicant of any areas of fisheries management that will be challenging for the applicant in achieving certification of their fishery.

The validation activity will identify the fisheries management organizations responsible for the fishery. The applicant shall disclose all possible information to facilitate a full Assessment Validation of the application. The Assessment Validation evaluation shall be based on, but not restricted to, reviewing documentation. The need for site visits to a fishery is dependent upon the complexity of the fishery and the level of information available.

The Certification Body's assessor shall determine what documentation and data are included in the review, but the following issues shall be addressed, documented, and retained by the Certification Body:

- a) General historical background information on the area of the fishery;
- b) Principal management authority governance, including policy objectives and/or relevant regulations;
- c) Fishery sector landings and the general economic situation of the fishery;
- d) Overview of the fishery to be certified, including management practices, scientific assessment of the stocks, and a clear definition of the unit of certification being proposed;
- e) Other relevant fisheries in the vicinity not subject to certification but that may interact with the fishery being assessed;
- f) External factors (such as environmental issues) that may affect the fishery and its management;
- g) A list of key stakeholders in the fishery and their special interests, where relevant; and
- h) If relevant, information for any subsequent product Chain of Custody certification.

Procedure 2: Application to Certification Procedures for the Alaska RFM Fishery Standard

The Assessment Validation Report shall include the following:

- a) A review of the applicant's ability to represent the fishery to be included in the certification;
- b) An overview of the fishery management framework with an organizational plan of the principal management organizations, their roles and responsibilities;
- c) A pre-assessment of the extent to which the fishery is consistent with the RFM Fishery Standard's fundamental clauses (note that supporting clauses are assessed only during full assessment);
- d) A review of the availability of data in the various categories to be included;
- e) A determination of the overall scope of the full certification assessment;
- f) A description of potential obstacles or problems that may be barriers to certification;
- g) Identification of organizations and entities that will be important for review and engagement in the event of a full assessment; and
- h) Approval of the report by the Certification Body Program Manager is forwarded to the applicant for consideration for proceeding to full assessment. This report is Confidential.

3.4 Validation Assessor(s)

If decision is made to carry out the Validation Assessment, Assessment Validation must be conducted by suitably qualified Assessor(s). The Assessor(s) must possess the following competencies directly, or through sufficient information review, prior to undertaking the site visit:

- a) Literate in the local language of the fishery; and
- b) Understand the key features of the fishery in application - biology, fishing gears used, geographic range, and key management agencies

The decision to utilize more than one Assessor shall be based on the size, technical complexity and competency profile of individuals. Normally, large-scale fisheries that exist over trans-boundaries and multiple states shall require at least two Assessors. Where the Applicant is a smaller scale, national or regional fishery, one Assessor may be appropriate for use, assuming the assessor has experience in the all key areas reviewed in the Validation Report.

3.5 Assessment Validation Report

The Assessment Validation report shall be completed and submitted to the Certification Body Program Manager. The Certification Body Program Manager shall review the report and shall seek any points of clarification from the assessors.

Procedure 2: Application to Certification Procedures for the Alaska RFM Fishery Standard

The Certification Body Program Manager must be satisfied that the Application is feasible to take forward to formal and full assessment. Should the Certification Body Program Manager have concerns with any aspect of the application, these concerns shall be discussed with the applicant and assessors prior to confirming the fishery is fit to undergo full assessment.

3.6 Initial Full Assessment

Assuming the Validation Assessment and resulting report is requested by the client, and the work is conducted accordingly, the Certification Body Program Manager shall appoint an Assessment Team with expertise in appropriate disciplines, sufficient experience, and recognized standing, to assess the fishery against the RFM Fishery Standard.

The Assessment Team shall include a Certification Body Lead Assessor who shall be responsible for the completion of the assessment in accordance with Certification Body procedures.

The Lead Assessor needs to meet the minimum competency and training Criteria.

Candidates for the Assessment Team must meet the appropriate requirements, including the following additions: the collective Assessment Team shall have appropriate demonstrated technical expertise in the following areas, although any one team member may be an expert in more than one area:

- a) Fish stock assessment—a team member must have at least 5 years experience in the production or review of stock assessment methods relevant for the fishery (or fisheries) under assessment;
- b) Fish stock biology and ecology—a team member must have at least five years of experience in the biology and ecology of the target, or similar, species;
- c) Fishing impacts on aquatic ecosystems—a team member must have at least five years of experience in research policy analysis, or management of fisheries impacts on aquatic ecosystems and marine conservation biology;
- d) Fishery management and operations—a team member must have at least ten years of experience as a practicing fishery or aquatic natural resource manager, or as a fishery or aquatic natural resource management analyst. A team member must also have a good understanding of the management systems used in the fishery under assessment;
- e) Current knowledge—a team member must have an up-to-date understanding of the country, language, and local fishery context sufficient to support meaningful assessment of the fishery;

Procedure 2: Application to Certification Procedures for the Alaska RFM Fishery Standard

- f) Third-party product and management system conformity assessment auditing techniques—a team member must have experience and relevant qualifications as lead auditor, and must have a good understanding of the FAO RFM Program.

The Certification Body Program Manager shall ensure that the combined expertise of the appointed team shall cover all the required areas for full assessment. The fishery client shall have the right to object regarding the chosen Assessment team members, before appointment and contracting. Assessors shall be required to enter a Contract with the Certification Body.

3.7 Assessment Team Verification

The designated Assessment Team members shall be reviewed by the Certification Body Program Manager to ensure that they achieve the minimum acceptable assessor criteria.

The appointment of the Assessment Team shall be confirmed to the Applicant and communicated to the ASMI RFM Team so that it can be noticed on the ASMI website, for the information of registered stakeholders and the public.

3.8 Assessment Team training, briefing, coordination and defining specific roles

The assessors will be appointed through the application of Assessor Appointment/Competency. Assessors shall possess the competency profile as described (under 3.6) and will be appointed on the basis of the following broad criteria:

- a) A Certification Body Lead Assessor (primarily familiar with the Assessment Procedures, and with verifiable experience in one or more areas of fisheries science and or management, as listed below);
- b) Local Expertise (thorough knowledge of the fishery management organizations, fishery activities and conversant in local language); and
- c) Specific expertise (either in fishery stock assessment, fishery ecosystem interactions, socio-economic interactions, or fishery resource management practices, depending on the fishery) which complement the expertise of other assessors forming the team.

Assessors will be briefed on the basis of their specific role in the Assessment Plan. Training and confirmation will be required for all appointed Assessors in the RFM Responsible Fisheries Management Certification Procedures, including the following:

- a) Overview of the Alaska Responsible Fisheries Program;

Procedure 2: Application to Certification Procedures for the Alaska RFM Fishery Standard

- b) Understanding of RFM Code of Conduct for Responsible Fisheries and RFM Guidelines for the Eco-labelling of Fish and Fishery Products from Marine Capture Fisheries;
- c) Understanding of the RFM Fishery Standard;
- d) Familiarization and confirmation of the RFM Fishery Standard checklists used for assessment purposes through review of previous reports; and
- e) Overview and understanding of roles and responsibilities for carrying out the assessment.

Normally the Certification Body Lead Assessor shall conduct the necessary training and briefing of Assessors; otherwise, this will be carried out by the Certification Body Program Manager.

The Assessment Team will receive copies of the following documents:

- a) FAO Code of Conduct for Responsible Fisheries;
- b) FAO Guidelines for the Eco-labelling of Fish and Fishery Products from Marine Capture Fisheries;
- c) Other relevant FAO based reference documents
- d) The Assessment Validation Report of the applicant fishery (if available);
- e) RFM Fishery Standard;
- f) RFM Fishery Standard Assessment template/checklist;
- g) RFM Scoring Guidance; and
- h) Training materials (PowerPoint presentation).

3.9 Assessment Plan

The Fishery Assessment Plan shall be prepared by the Certification Body Lead Assessor with discussion with the appointed Assessment Team. The primary objective of the Assessment Plan is for the parties to agree on the approach and activities of assessment of a fishery for full appraisal against the requirements of the RFM Fishery Standard. Key objectives of the Assessment Plan include:

- a) Identification of stakeholders for engagement
- b) Scoping of the requirements for on-site verification activities;
- c) Agreeing on and planning the desktop review requirements;
- d) Agreeing on and planning the roles and activities of individual assessors;
- e) Agreeing on and planning the timelines and schedule for assessment.

The Assessment Plan is based on the Assessment Validation Report (if available), or on general information about the state of the fishery and its management. There are three main components of the Assessment Plan:

- a) Assessment Team briefing, coordination and defining specific assessment roles;

Procedure 2: Application to Certification Procedures for the Alaska RFM Fishery Standard

- b) On-site visits; and
- c) Desktop review of available information

The Assessment Plan must define the following:

- a) Unit of Certification and Assessment Units;
- b) The specific roles of each member of the Assessment Team with respect to the review and assessment of information against the RFM Fishery Standard;
- c) A list of fishery participants that will form part of the site visit (N.B site visits may be extended depending upon information available throughout the assessment);
- d) Potential dates for on-site visits; and
- e) Draft timelines for each part of the assessment.

The appointed Certification Body Assessment Team shall review the Validation Report or other relevant information prior to formulation of the Assessment Plan and designation of assessment units.

The Assessment plan shall incorporate all the required elements to conduct a full assessment against the RFM Fishery Standard.

The Assessment plan shall be based on a mixture of desktop assessment and on-site meetings. The balance of on-site activities and desktop assessment shall be agreed by the assessment team and will be derived from:

- a) Application Validation Report or other relevant fishery information;
- b) Local knowledge;
- c) History of the fishery;
- d) Appropriate authority/ies, management, and controls; and
- e) Current scientific advice.

The assessment plan shall include consultations with the registered stakeholders and may include:

- a) The applicant;
- b) Appropriate management authorities, institutions and agencies;
- c) Fishery associations or representative groups;
- d) Fishing vessel owners;
- e) Seafood processors; and
- f) Non-governmental Organizations.

3.10 On-Site Assessment and Engagement

The on-site visit plan shall be produced by the Certification Body Lead Assessor and communicated to, and agreed upon, with the Assessment Team. The site visit plan shall be made public and normally take place as a single visit, but additional visits may be planned when further information is required. The requirements for information will be based on the outcome of the Validation Assessment Report or other background information and through contributions from the Assessment Team members.

Engagement with the stakeholders can take place throughout the assessment period, by direct meeting, by e-mail correspondence, and by telephone. A record log of all engagement meetings with the applicant, fishery participants, and stakeholders must be maintained as part the procedures of assessment.

In the context of this program, the term “on-site” refers to activities that the Assessment team conducts in the geographic region of the applicant fishery (e.g. Site Visits).

3.11 Desktop review and analysis of information

Desktop review and analysis of fishery and fishery related information form a major component of the assessment. The review will specifically confirm the documentary evidence that fulfils the requirements of the RFM Fishery Standard. The review will take place against the RFM Fishery Standard Checklist and Scoring Guidance.

Each member of the Certification Body Assessment Team will be assigned responsibility through assessment planning, specific fundamental and associated supporting clauses for evaluation. The RFM Full Assessment /template will be provided to each assessor in order to document the review in a consistent manner, in line with the standard.

Fishery Information:

Information types and sources can range from legal instruments such as acts, regulations, and laws; official documentation published or required for collection by the management authorities or official organizations (permits, landing declarations, official catch records).

Review activities may include scientific and statistical information concerning the status of the fishery resource, such as agency reports, stock assessments, and supporting research from state or official scientific sources organizations, including published science or objective information from independent research produced by recognized institutions or otherwise credible sources.

3.11.1 Desktop review and analysis of information

Fishery Information: (continued)

Where possible, independent information should be peer-reviewed and published, although the Assessment Team must review the validity and importance of information on the outcome of the assessment. ‘Softer’ unofficial information, either in printed format or contributed verbally at meetings, may also be used in supporting the general body of documented information and for verification of the conformance of the fishery to the RFM Fishery Standard.

Information Sources:

The assessment is based on information that constitutes demonstrable evidence that the fishery complies with the RFM Fishery Standard. Fishery-based information can come from a number of areas, both directly and indirectly from the client fishery, management organizations, fishery participants and associated entities, and through on-site interviews and witnessing of management processes.

The Assessment Team shall conduct desktop reviews of all available relevant literature, which shall be referenced within the appendix of the report produced. Desktop assessment shall include the following:

- a) Competent management authority establishment legislation;
- b) Competent management authority governance procedure;
- c) Competent management authority reporting activities;
- d) Competent management authority surveillance and enforcing activities;
- e) Scientific stock assessment advice;
- f) International fishery stock assessment guidance (where applicable);
- g) Published stock assessments conducted by third party organizations (where available); and
- h) Information from non-governmental organizations.

Members of the Assessment Team are responsible for their own specific areas of assessment. This includes identification and sourcing of information and referencing of information used in the review and analysis. The Validation Report, if available, provides a list of fishery references and will be made available to each member of the Assessment Team.

3.12 On-site Fishery Assessment

Procedure 2: Application to Certification Procedures for the Alaska RFM Fishery Standard

The fishery assessment shall be conducted in accordance with the agreed plan; any required deviations from the plan shall be approved by the Certification Body Program Manager.

The assessment shall take further opportunity, as necessary, to verify particular aspects of the assessment directly, through 'witnessed assessment'. A witnessed assessment is a site visit for local consultation with fishery managers, industry and relevant stakeholders. On-site meetings with management organizations also provide an opportunity for additional information to be gathered and verified.

The on-site portion of the investigation shall be communicated to all those identified in the plan as requiring an on-site meeting, preferably 30 days prior to the date requested. This period may be shortened with the consent of both parties. The applicants shall be advised of all on-site activities.

A summary from each on-site meeting shall be documented in the Assessment Report, from both the validation and the full assessment site visits, as appropriate.

3.13 Assessment Method

The Assessment Team will document the available evidence that addresses each of the RFM Fishery Standard Clause.

The available evidence from each section is assigned a confidence rating (high, medium or low), which signifies the confidence of the Assessment Team in the quality of information that demonstrates conformity of the fishery at meeting a particular clause. In each case, the Assessment Team members work individually in reviewing the evidence and compiling the rationales for each assigned clause.

A preliminary rating is assigned in each case, but the Assessment Team must reach consensus on the final confidence ratings and score for each clause.

The draft rationales and preliminary confidence ratings produced by individual Assessors are compiled in the master copy of the Full Assessment Report by the Lead Assessor and circulated to all Assessment Team members.

Each team member will individually review and collectively discuss the evidence-based rationales and preliminary ratings in order to reach agreement on the final rationales and confidence ratings.

Assessment Team collective review sessions shall be convened and chaired by the Certification Body Lead Assessor. Where an Assessor is not available for a session, the

Procedure 2: Application to Certification Procedures for the Alaska RFM Fishery Standard

Assessor must at a later opportunity review and confirm whether he or she agrees with the outcome of the Assessment Team scoring session/s. All Assessors must ultimately agree upon the final rationales, ratings, and Assessment Report findings.

A unanimous decision, wherever possible, shall be reached by the Assessment Team to score each of the clauses making up the assessment. In the event that the Assessors support different views on what the score should be, majority opinion shall rule.

This outcome shall be clearly documented in the report for Peer Review, Public Comment, and Certification Committee consideration. Assessment Team sessions may be convened in person or, where distance and timing makes physical meetings difficult, sessions may be convened through formal conference call arrangements.

There is no limit to the number of sessions that can be convened in order to collectively review all rationales and form consensus on ratings, and the number of sessions needed will depend on the complexity of the fishery under assessment and the available information.

A typical assessment may include two or three sessions each of two to three hours duration. Assessors are expected to review rationales prior to attending collective review sessions and form questions, opinions, and responses. Documentation reviewed by one Assessor for a particular RFM Fishery Standard may contain information that will support the outcome of rationales for other RFM Fishery Standard.

3.14 Confidence Ratings and Assignment of Non Conformances

The definition of Confidence Ratings assigned by Assessors shall be as follows:

Low Confidence Rating (Critical Non-Conformance level)

Information/evidence is completely absent or contradictory to whether an element of the fishery complies with the given requirements of a supporting clause. In these cases, a **low confidence rating, equivalent to a critical non-conformance**, is assigned.

Alternatively, any non-conformance assigned to any Section A to F, above the designated maximum permitted, one major non-conformance or three minor non-conformances, will also result in the assignment of a critical non-conformance (at Section level).

A critical non-conformance will essentially stop the assessment (not allowing for certification), unless the applicant is able to provide information or evidence that demonstrates a better state of the fishery than previously assessed.

Procedure 2: Application to Certification Procedures for the Alaska RFM Fishery Standard

The Validation Report activities are designed to determine if critical non-conformances within the Applicant Management System are likely before proceeding with the assessment. Notwithstanding this, the option of assigning critical non-conformances remains available to the Assessment Team if there is merit for this decision to be taken.

Medium Confidence Rating (at Major Non-Conformance level)

Information or evidence is limited that demonstrates compliance of an element of the fishery with the given requirements of a supporting clause. In these cases a **major improvement is needed to achieve high conformance** and for a **medium confidence rating at this level, a “major non-conformance”** is assigned. This will prompt the Assessment Team to make decisions on undertaking further requests for clarification with the applicant and management organizations, which may result in the assignment of a higher level of confidence against a particular clause.

Medium Confidence Rating (at Minor Non-Conformance level)

Information or evidence is broadly available that demonstrates conformity to a clause, although there may be some gaps in information that, if available, would clarify aspects of conformity and allow the Assessment Team to assign a higher level of confidence. In these cases a **minor improvement is needed to achieve high conformance** and for a **medium confidence rating at this level, a “minor non-conformance”** is assigned. Again, the Assessment Team may request further clarification with the Applicant and management organizations which may result in the assignment of a higher level of confidence against a particular clause.

High Level of Confidence

Where the Assessment Team agrees that sufficient information or evidence is available to demonstrate conformance to a given supporting clause, **a high level of confidence** can be assigned. Sufficient evidence is that which, through the expert opinion of the collective team, substantiates the full compliance of a given element of a fishery with the RFM Fishery Standard.

A critical non-conformance means failure of the fishery to meet the standard for certification. This will be applied whenever:

- a) Information or evidence is completely absent or contradictory to demonstrate compliance of an element of a fishery with the given requirements of a supporting clause, or when
- b) **The maximum permitted non-conformances** (one major non-conformance or three minor non-conformances) assigned to any of the six key components of Responsible Fisheries Management (A-F) are **exceeded**.

Procedure 2: Application to Certification Procedures for the Alaska RFM Fishery Standard

Confidence Ratings and Assignment of Non Conformances (continued)

For both conventional and enhanced fisheries, the following table shows the maximum level of non-conformance permitted throughout Sections A-F.

**Maximum permitted
before issuing a critical
non-conformance**

Section	MAJOR NC OR	MINOR NCs
A	1	3
B	1	3
C	1	3
D	1	3
E	1	3
F	1	3

Taking into consideration that one major non-conformance equates to three minor non-conformances, and that each Section A to F can carry one major or three minor non-conformances, the following table shows the combination of major/minor non-conformances throughout a given Alaska RFM assessment that can be assigned before the fishery enters a failed status.

Major non-conformance(s)	Minor non-conformance(s)
0	18
1	15
2	12
3	9
4	6
5	3
6	0

3.15 Requests for Clarification

During the review process, individual Assessors may propose requests for clarification which constitute areas within the assessment where the current level of available information/evidence is insufficient to demonstrate a given level of compliance. Requests for clarification may also form the basis of on-site engagement.

3.16 Corrective Actions

The Applicant has 28 working days to submit evidence to close out any non-conformances identified in the Unit of Certification report. The evidence submitted to the Certification Body shall be provided to the Assessment Team's Certification Body Lead Assessor for review for either acceptance, rejection or to seek further clarification. The outcome of this review shall be reviewed by the Assessment Team for consensus agreement. Where consensus is not achieved, further requests for corrective action will be initiated, the responses to which will be reviewed in the same manner.

Corrective action may consist of information that directly closes out the area of non-conformity with no further action required. Additionally, corrective action may constitute a plan of activities that the applicant confirms will be implemented within a specific timeframe in order for the non-conformity to be closed out.

The Assessment Team's Certification Body Lead Assessor shall review the Corrective Action Plan and determine its adequacy at meeting the requirements of the particular clause and the appropriateness of the timeframe to achieve close out based on the complexity of the non-conformity and the requirements for close out. Depending on the nature of the non-conformance issues, corrective action may be planned over a longer period, but where corrective action takes longer than 12 months, milestones and targets must be included and progress toward close out reviewed during each annual surveillance audit. Ideally, unless in extraordinary circumstances, non-conformances shall be closed within the lifetime of a certificate.

Summary

- a) Where **Critical Non- Conformances** are raised, the assessment will not proceed to further steps in certification until evidence of reduced non-conformity is available and has been assessed.
- b) Where **more than one Major Non-Conformance** is assigned to either Section A, B, C, D, E or F, the assessment will not proceed to further steps in certification until evidence of reduced non-conformity is available and has been assessed.

Procedure 2: Application to Certification Procedures for the Alaska RFM Fishery Standard

- c) Where **more than three Minor Non-Conformances** are assigned to either Section A, B, C, D, E or F, the assessment will not proceed to further steps in certification until evidence of reduced non-conformity is available and has been assessed.

Where possible, corrective action plans must be based on activities that can be verified and measured with respect to close-out of a particular non-conformance. Where close-out requires the cooperation and support of fisheries management organizations, these must be identified with specific tasks and activities to be undertaken.

The Assessment Team's Certification Body Lead Assessor must confirm directly with management organizations that there is formal agreement to undertaking the tasks and activities identified under their responsibility within the corrective action plan.

The Applicant must formally sign off on the corrective action plan and commit to supplying information and evidence of progress towards its implementation, as requested by the Assessment Team's Certification Body Lead Assessor.

The Certification Body Program Manager shall review and agree to all corrective action plans submitted by the applicant before proceeding to the next steps in the certification process.

Assessment Report Review

The Assessment Team's Certification Body Lead Assessor shall prepare the Full Assessment Report. The Assessment Team's Certification Body Lead Assessor shall review all evidence submitted by the Assessment Team to ensure that the applicant meets the requirements laid out in the assessment plan and Assessors have completed their duties in accordance with Certification Body requirements.

The Full Assessment Report for the fishery shall be reviewed for formatting, grammar, and proper spelling.

3.17 Peer Review

The Certification Body shall arrange for the full Assessment Report to be reviewed by a minimum of two peer reviewers considered to be competent in relevant aspects of fishery resource research and management, to the extent of being able to technically evaluate with confidence the content of the full Assessment Report.

Procedure 2: Application to Certification Procedures for the Alaska RFM Fishery Standard

Peer reviewers shall be appointed according to Certification Body procedure. As a minimum (collectively), the peer reviewers shall satisfy the key requirements detailed previously under 3.6, particularly as they relate to the fishery under assessment.

The Certification Body shall notify the applicant and ASMI RFM Team of the designated proposed peer reviewers.

The Certification Body shall agree with the peer reviewers on a timeframe for the peer review process and submission of feedback from the peer reviewers.

Peer reviewers shall be briefed in the review process and provided with a Peer Review Template and Guidance document, where they will formally report their work.

Upon receipt of the Peer Reviewers Reports, the Assessment Team shall consider each comment and issue raised against each RFM Fishery Standard clause and make a formal written response. Accordingly, the Assessment Team may incorporate any appropriate changes into the full Assessment and Certification Report based on comments raised. The peer review reports and Assessment Team response to the peer review comments shall be formally documented in their entirety, in the final full Assessment and Certification Report.

3.18 Assessment Report Contents

The Assessment Report will be prepared for Public Comment. The public comment full Assessment Report shall contain the following major items:

- a) Identification of the Unit of Certification it considers;
- b) The recommendation for certification of the Assessment Team;
- c) The background, history, status, and management of the fishery;
- d) A summary of the conformance of the fishery to the RFM Fishery Standard;
- e) The detailed rationales and evidence ratings assigned by the Assessment Team against each clause;
- f) Non-conformances raised and corrective action plans; and
- g) Peer review reports and responses to peer review comments from the Assessment Team.

Where there is concern by the applicant of a decision made by the Assessment Team, the applicant shall be provided with an opportunity to question the Assessment Team and have the issue re-examined.

Any comments made by the applicant, and return comments from the Assessment Team, shall be documented and retained by the Certification Body.

3.19 Public Comment Period

Following the peer review, the full Assessment Report with peer review comments will be placed on the Certification Body website and on the ASMI website for a period of 30 days to allow for comments by registered stakeholders and relevant interested parties. All comments will be made to the Certification Body.

Within the following 30 Days, the Certification Body Assessment team will review and respond to all relevant comments, including appropriate revisions to the Assessment Report, as necessary.

A final Assessment Report will be compiled which will contain all the comments submitted and their outcome. If the Assessment Report continues to recommend certification, the final Assessment Report will be submitted to the Certification Body Certification Committee for its consideration.

3.20 The Certification Committee Stage

The Certification Body's Program Manager or Administrator shall convene a Certification Committee Meeting with members of appropriate competence. Such competence shall be recorded on the certification meeting minutes along with statements in respect to conflict of interest.

The Certification Committee shall have members who are competent in relevant aspects of fishery resource management, to the extent of being able to technically understand and evaluate the content of the full Assessment and Certification Report. The Certification Committee shall also have representation from members with competence in certification activities.

3.21 Certification Decision

There are three possible Certification outcomes:

Certify: The Certification Committee accepts the Unit of Certification report, the peer reviewer's comments, and evidence submitted by the client in respect of conditions or non-conformances. The Committee may set additional requirements on the fishery with respect to non-conformances raised and based on peer review comments.

Defer: The Certification Committee is unable to reach a unanimous decision due to substantial concerns raised by the committee or the setting of substantial corrective actions that require discussion with the Applicant. The Certification Committee may

Procedure 2: Application to Certification Procedures for the Alaska RFM Fishery Standard

agree to review the file again following submission of further evidence with respect to a certification decision.

Reject: The Certification Committee decides that the fishery cannot be certified based on the evidence submitted and their concerns cannot be resolved by setting conditions on the fishery.

3.22 Notification of Certification Decision

All decisions on certification status will be advised in writing to the respective applicants within ten working days of the Certification Committee meeting. The letter will include notification of any conditions or non-conformance requiring corrective action and time scale for completion. A copy of this correspondence will be held in the applicant's file. A summary of the certification meeting will be included at the end of the full Assessment and Certification Report.

Certificates will not be issued until the applicant has confirmed, in writing, acceptance of conditions and non-conformances and has provided an action plan to resolve these within an appropriate time. These plans will be reviewed by and approved, in this order, by the Assessment Team, the Peer Review Team and subsequently, the Certification Committee.

3.23 Complaints and Appeals

Applicants or registered stakeholders that have been involved in the process can Appeal against Certification Body decision using the RFM Appeals and Complaints Procedure.

The complaints will initially be made to the Certification Body. If the complaint is not satisfied, the complaint can be made to the RFM Fishery Standard Appeals Board.

Complaints that are upheld by the RFM Fishery Standard Appeals Board will be communicated to the Certification Body and to their Accreditation Board. Only the Certification Body and their Accreditation Board have the ability to reverse a certification decision.

3.24 Certificate Issue

On receipt of the agreed accepted certification decision, the formal certificate may be issued to the client by the Certification Body.

The certificate shall detail the following information:

- a) Applicant's name and address;
- b) Unit of certification;

Procedure 2: Application to Certification Procedures for the Alaska RFM Fishery Standard

- c) Management authorities;
- d) Species;
- e) Geographic region;
- f) Gear types;
- g) Issue date (the certification decision date);
- h) Surveillance date (annual);
- i) Expiration date (five years less a day from the issue date);
- j) Any corrective action plans and timescales for close-out where applicable (annexed to the certificate); and
- k) List of fishery participants within the client group.

Certificates shall be valid for a period of five years, after which period a full reassessment must be under taken, to be concluded within the period of validity of the Alaska RFM program certificate if the client wishes to maintain uninterrupted certification. The Certification Body may extend the length of the certificate for a short period for just cause.

The Certificate remains the property of the Certification Body and is issued subject to the Client complying with the Certification Body's general rules and regulations, a copy of which is provided with the certificate. The full Assessment and Certification Report shall be sent to the applicant and published on the RFM website.

4. Fishery Surveillance Audits

To ensure that a certified fishery remains in compliance with the requirements of certification, surveillance audits will take place, at least annually and more frequently if deemed necessary. Short notice audits may also be indicated and may be carried out by the Certification Body.

4.1 Arranging Surveillance Audits

Surveillance audits shall be planned to take place and be completed within a target eight weeks window from of the anniversary of the date of initial certification (as specified on the client certificate). The surveillance audit may consist of two parts: 1) an on-site visit for auditing the unit of certification fishery and 2) a desktop review of the documentary evidence in the form of reports and published information available since the initial certification or previous surveillance audit. An on-site visit may not be deemed necessary by the Certification Body based on the performance of the fishery, status of non-conformances and related corrective actions, as detailed in the previous assessment report (full assessment or surveillance).

4.2 Surveillance Audit Focus

Surveillance audits will focus on the following:

- a) Compliance and progress with non-conformances and agreed action plans;
- b) Changes in the management regime and processes that may affect the outcome of certification;
- c) Changes to the organizational responsibility of the main management agencies that form part of the fishery management framework;
- d) New information on and assessment of the status of stock/s under consideration from recent survey, significant changes in the ecosystem effects of the fishery (e.g., bycatch, discards, ETP species interactions, gear habitat interactions) violations and enforcement information, and other new evidence of a scientific basis that may affect the outcome of certification; and
- e) Continued compliance with the RFM Fishery Standard.

The Certification Body shall establish an agreed upon surveillance plan with the client for the certified fishery, incorporating the surveillance of any observations and corrective action activities identified in the initial certification report and subsequent surveillance audit reports.

4.3 Desktop Review

The desktop review shall be performed by one or more assessors and should include at least one member of the on-site audit team. Assessor approval shall be according to the RFM program criteria.

Desktop reviews shall include a request to the client, preferably prior to the site visit, for any known up-dates and changes in the management of the fishery and, where available, copies of reports that may form evidence for evaluation. Assessors shall, however, also undertake an independent investigation of any new evidence and changes to the management regime/performance through both the on-site audit and background desktop evaluation.

4.4 On-site Audit

If deemed necessary by the Certification Body, the on-site audit shall be organized in agreement with the client, to ensure that sufficient time is allocated to each visit and that all relevant management organizations are included in the visit. The surveillance site visit can be conducted by one or more assessors. Assessor approval shall be

Procedure 2: Application to Certification Procedures for the Alaska RFM Fishery Standard

according to the RFM program criteria with appropriate record of the approval and competence. Registered stakeholders may submit Information relevant to the audit.

4.5 Surveillance Assessment Report

Surveillance reports will be summary reports produced according to the 'RFM Surveillance Report' template:

- a) Client contact details, unit of certification, and confirmation that there are no changes or updates to the unit of certification;
- b) Surveillance report number (1, 2, 3 or 4) and date of report;
- c) Summary findings and recommendations for continued certification, suspension or certificate withdrawal;
- d) Any site visit dates and summary of audits made to the Client and management organizations;
- e) An update on the catches, key features of the fishery, and any new fishery developments (i.e., new stock assessment results or reports, new ecosystem considerations) during the period from certification to the present time; and
- f) An update on any changes and statement of consistency to the fundamental clauses of each section A-F of the RFM Fishery Standard. Updates shall be based on information collated from the period from certification.

Information collated since certification date or after 12 months from the previous surveillance activities will include an update on any changes and statement of consistency to the fundamental clauses of each section A-F of the RFM Fishery Standard. Updates shall be based on information collated since the latest assessment:

- a) Consideration of the scientific advice and management actions on the stock and other dynamic related areas specific to the RFM Fishery Standard;
- b) Any changes to the management regime, particularly where these are implemented through regulations or other means and significantly affect management of the resource in questions;
- c) A review of the performance of the client specific to agreed corrective action plans raised against non-conformances in the initial certification and subsequent surveillance reports;
- d) A list of non-conformances that remain unclosed and new non-conformances that have been raised through surveillance activity and non-conformances that

Procedure 2: Application to Certification Procedures for the Alaska RFM Fishery Standard

are now closed. Sufficient detail on progress and evidence of close out shall be presented in the report;

- e) Details of any revision or close-out of the corrective action plan, an update of remaining non-conformances and proposed surveillance activities where these are specified as less than annually;
- f) Client-signed acceptance of the action plan;
- g) Post-presentation of the surveillance report for certification, the decision of the outcome of the surveillance assessment shall be specified in a separate section; and
- h) A list of references and supporting information used in the audit reporting.

If, during a surveillance audit, the Certification Body identifies issues that warrant further investigation, then a limited re-assessment may be instigated. The client shall be notified in writing of its intention and rationale to the limited re-assessment. The Certification Body may elect to suspend the certificate until such time as the outcome of re-assessment and certification is confirmed. Re-assessment shall only be conducted on confirmation by the client.

Surveillance Assessment Report (continued)

The re-assessment shall be conducted according to assessment and surveillance procedures, as necessary to fully investigate and gather evidence to support the level of confidence associated with the issue of non-conformity. The re-assessment report shall be specific to the criteria and shall fully establish the conditions, level of conformity and subsequent non-conformances, action plans and outcomes with respect to certification status recommendation.

4.6 Assessing progress against corrective action plans and observations

Assessors shall audit compliance progress and performance with respect to the agreed corrective action plan. Compliance with the plan shall be assessed and reported within the surveillance report. Where progress is evaluated as behind target, this will be reported in the surveillance report for presentation to the Certification Committee.

The outcome of the Certification Committee's review may result in additional requirements including:

- a) A revision in action plans and timelines;
- b) A requirement for new corrective actions to be implemented;

Procedure 2: Application to Certification Procedures for the Alaska RFM Fishery Standard

- c) Immediate close out of non-conformances; and
- d) Suspension of the certificate until such time as the specified requirements are fulfilled.

Where continued failure to progress within action plans for the closure of non-conformances ensues, the certificate shall be placed in suspension pending a full review by a Certification Body with respect to continued certification or certificate withdrawal.

4.7 Suspension or withdrawal of Certificate

Where the Certification Committee determines that the fishery no longer meets the requirements for certification, suspension or withdrawal shall be initiated. A Certification Body shall inform the client in writing of its intention to suspend or withdraw the certificate, with a written rationale for its decision.

Where a client refuses to undertake additional re-assessment or fails to provide sufficient access for re-assessment purposes, the client certificate will be suspended pending potential withdrawal, based on the outcome of a review by the Certification Body Program Manager.

The client shall be given 28 days to provide further evidence in respect to the decision of suspension. Such evidence shall be reviewed by the Certification Body Program Manager who may convene a Certification Committee as part of this review.

If, as an outcome of the review, a Certification Body determines that the fishery or part of the fishery is failing to meet the requirements of certification, the Certification Body shall provide the client 28 days advance notification of its intention to withdraw the certificate.

If, after the 28-day period, further evidence is not provided to resolve the failure of certification requirements, the fishery shall be considered to have failed certification requirements and the certificate shall be withdrawn and any unreturned certificates shall be invalidated.

Certificate Alteration

In the event that there is a significant change proposed to this program, the Certification Body shall be notified, who then must inform the Accreditation Body.

Upon receipt of the findings of the Certification Committee, the client may formally request an assessment of the feasibility of amending the Unit of Certification.

Procedure 2: Application to Certification Procedures for the Alaska RFM Fishery Standard

The Certification Body will undertake this feasibility assessment. The outcome and risk assessment of implications will be validated by the Certification Committee. The feasibility report and validation determinations will be copied to the applicant.

If the unit of certification can be amended without affecting the integrity of the standard or program, the applicant will be informed. If in agreement, the Certification Body will ask the applicant to return the original certificate, and the applicant will be issued with an amended certificate stating the specifics of inclusion and exclusion of the amended unit. There is no alteration to the date of expiration on the certificate.

The applicant is required to inform all relevant parties that the unit of certification has been amended and to ensure that companies certified to the Chain of Custody Standard are informed and directed as to the proper and approved use of certification claims and seals on the product and associated marketing.

The next surveillance audit will be against the amended unit of certification.

Where a client appeals the decision to withdraw a certificate, the RFM Appeals procedure will be followed.

4.8 Certification files

The Certification Body Program Manager or Administrator will review the applicant's file 30 days after the relevant Certification Committee meeting to ensure that all record files, forms, minutes and certificates are in place. The following records, relative to audits and certification decisions, will be maintained, either as hard copy or on electronic file:

- a) File checklist;
- b) Application form;
- c) Assessor and peer review contracts;
- d) Assessment validation report, if appropriate;
- e) Site visit schedule confirmation letter;
- f) Assessment plan;
- g) Audit report forms / peer review template;
- h) Letter detailing non-conformances, where applicable;
- i) Response from applicant on corrective actions;
- j) Letter notifying applicant of certification decisions by Certification Committee;
- k) Relevant certificate or acknowledgement Letter; and
- l) Minutes of certification meetings.

Procedure 2: Application to Certification Procedures for the Alaska RFM Fishery Standard

The applicant's file will be reviewed according to an internal review program scheduled and conducted by the Certification Body's internal auditor.

5. Transfer of Certification Bodies

Clients can choose to change to an alternative 'ASMI approved' Certification Body.

Clients must inform their current Certification Body and ASMI, in writing, of a decision to change Certification Body three months before a scheduled surveillance audit to ensure that there is adequate time for this transition.

The new Certification Body must liaise with the existing Certification Body and the client to ensure a transfer of all relevant information and the formation of a suitable assessment team. Both Certification Bodies shall fully co-operate.

Relevant information may include any outstanding financial considerations and any outstanding non-conformances. The new Certification Body will conduct the surveillance audit as per procedures and will issue a new certificate if the surveillance audit is successful. The outgoing Certification Body will then recall the original RFM Certificate.

www.alaskaseafood.org

rfm@alaskaseafood.org