



RFM

Procedure 4:

Application to Certification

Procedures: Chain of Custody

*Alaska Responsible Fisheries Management (RFM)*

*Certification Program*

*17065*

# Procedure 4: Application to Certification Procedures for the Alaska RFM Chain of Custody Standard

## 1.0 Purpose and Scope

This document defines the procedures required for all Applicants wishing to apply for certification approval to the Alaska Responsible Fisheries Management (RFM) Chain of Custody 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 procedures.

The Scope of the Chain of Custody is defined in the Standard (Page 6) and includes:

- a) Processing Vessel / Processing Vessel Group;
- b) Primary Processor;
- c) Secondary Processor;
- d) Subcontractor (carrying out contract processing, packing or labeling activities);
- e) Trader; and
- f) Market / Retailer / Restaurant.

## 2.0 Inquiries and Requests for Application

Upon receipt, the Certification Body will direct all inquiries and requests for Alaska RFM Chain of Custody assessment to the appropriate Certification Body program manager/administrator.

This staff member must be fully trained in the Alaska RFM Chain of Custody(CoC) Program and will provide the applicant with full details of the assessment application process including the Standard's requirements, scope of assessment, time frames, and assessment fees. Additionally, the staff member will address any questions the potential applicant may have regarding the program. Following the initial contact, the potential applicant will be sent an information packet containing an official Alaska CoC program application form and a comprehensive list of all the Alaska RFM CoC program requirements.

## 3.0 Application Processing

Only potential applicants that have used the official Alaska RFM CoC Program application form designated by the Certification Body will be considered. No other forms of application will be accepted by the Certification Body.

A submitted application will serve as a temporary contract between the potential applicant and the Certification Body, thereby confirming the potential applicant's commitment to abide by the Certification Body certification process protocols that have been set forth as part of the accreditation requirements to certify against the Alaska RFM CoC Program.

Once an application is received, the date of receipt and the time frame outlining the certification processing is entered into the Certification Body's program database or

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documented in hard-copy format. Further, the potential applicant information becomes the property of the Certification Body and will be available to the Alaska Seafood Marketing Institute (ASMI), upon their request.

Next, the Certification Body will conduct a review of the application to establish an appropriate Assessment Plan for the potential applicant. During this process, the Certification Body may contact the potential applicant to clarify any additional information needed in preparation of their assessment plan.

Once completed, the Certification Body will send the assessment plan to the potential applicant along with a cost estimate for the assessment work required for certification to the Alaska RFM CoC Standard.

### 4.0 Assessment Personnel and Scheduling

All assessments are arranged by the Certification Body and must be conducted by an approved assessor, thus ensuring that the assessor has the requisite industry knowledge and expertise for the given scope of the potential applicant.

If a sub-contracted assessor is used, written authorization confirming the subcontractor's qualifications to conduct the assessment must be sent to the potential applicant, and the subcontractor's name must be entered in the potential applicant's file. Additionally, the subcontractor's full assessment plan schedule must be attached to the written authorization, highlighting the dates and sites to be assessed. When the assessment is scheduled, the subcontractor must bring the written authorization and all associated assessment information to the potential applicant's site.

Once an assessment is scheduled, the potential applicants is notified of the date by letter of confirmation. This letter will state the inspection date and time, the inspection agenda, plus provides a time-stamped copy of the Certification Body's own certification protocols for the Alaska RFM CoC Program. The potential applicant will now become an applicant to the Alaska RFM CoC program.

**The Pre-assessment Phase of the Audit:** The Pre-assessment will be scheduled at a date that is mutually convenient with the applicant and the Certification Body. The assessment will include a discussion on the requirements of the Alaska RFM Chain of Custody Standard regarding applicant details: applicant customers, and product(s) to be assessed.

**Audits:** Within a 12-month time period from the Pre-assessment, an audit must be conducted at the applicant site. If the audit does not take place in accordance with the 12-month

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requirement, the Certification Body must submit a full report to ASMI clearly stating the reasons for having failed to meet the audit time frame requirements of the program.

### **Travel Arrangements:**

For all applicant assessments, all necessary travel arrangements such as flights, hotels and car rental must be made by joint agreement with the consulting Certification Body, the applicant, and the assessor, prior to the scheduled assessment dates.

### **5.0 Assessment Standards and Scope**

All assessments must follow the requirements of the Alaska RFM CoC Standard and use the approved Assessment Report checklist provided by the Certification Body coordinating the assessment. At any time, an up-to-date copy of the Alaska RFM CoC Standard can be obtained on the ASMI website (<http://certification.alaskaseafood.org/standard>). It is the responsibility of the Certification Body and the applicant to ensure that they have the most current copy of the published standard.

In the event that a legal requirement may arise that differs from the Alaska RFM CoC Standard, the legal requirement will take precedence over any requirement in the Standard.

In the event that additional assessment requirements arise, such as checking compliance with product specifications, a complaint or appeal investigation, the scope of the applicant's assessment plan can be modified to meet these additional requirements. However, any modification to the assessment plan requires ASMI's approval, and at no time can any required element of the Alaska RFM CoC Standard be omitted.

### **6.0 Pre-assessment Process**

As part of the pre-assessment process, applicants are required to submit details of the traceability systems used on their site and the components and operation of their Quality Management Systems, to the auditing Certification Body. This information enables the approved assessor to conduct a pre-evaluation of the operation before the actual planned date of the assessment.

Prior to any scheduled on site assessment, the applicant will be asked to review all the requirements of the Alaska RFM CoC Standard. The purpose of this self assessment review is to identify potential non-conformances to the Alaska RFM CoC standard and to initiate the appropriate corrective action in advance of the on site assessment.

The applicant will be required to conduct and document annual self assessment to the Alaska RFM CoC standard as part of the applicant's internal audit review plan.

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## 7.0 On site Assessment Process

The typical duration of a single-site assessment is one day. However, it is up to the Certification Body to determine the needed length of a site assessment and the one-day norm may be adjusted, as needed. The Certification Body will base the site assessment length by the determination of the associated risks that were used to determine the applicant's assessment plan.

The Risk Assessment incorporates multiple factors gathered from an applicant's application form. These include, but are not limited to the following:

- a) Product risk which is dependent on the applicant's position within the supply chain;
- b) Applicant size and technical resources: production area, product lines, employees, and employee turnover; and
- c) Applicant's prior knowledge of the Alaska RFM CoC Program.

## 7.1 Onsite assessment Requirements

The agenda for onsite assessment will be as follows:

- a) Open meeting; to confirm the scope of the applicant's assessment
- b) Review the Traceability and Quality Management Systems and assessment of their practical implementations;
- c) Inspect production facility with the goals of reviewing the practical implementation of the traceability systems and interviewing the specific personnel used to operate these systems;
- d) Review the production facility inspection to verify compliance with the reviewed systems and determine if further document checks are needed;
- e) Conduct final review of findings in preparation of the closing meeting; and
- f) Closing meeting to discuss compliance with the Alaska RFM CoC Standard.

## 7.2 Conformance Levels

Level Type	Description	Certification Body Action
CRITICAL (Audit)	This level indicates that the non-conformance fails to comply with the principles of the Standard, and the assessor provides clear evidence to demonstrate the nonconformance.	Certification Body does not grant certification and sets up a re-evaluation to verify that non-conformance has been resolved and that the approved applicant has put in place systems that ensure that non-

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	For example, if the seafood intended to be labeled as <i>Certified</i> was found not to have originated from a fishery certified to the Alaska RFM Program, the non-conformance must be described in detail.	conformance does not recur in future.
CRITICAL (Surveillance Audit)	This level indicates that the non-conformance fails to comply with the principles of the Standard.	Certification Body immediately suspends certification (pending an investigation), informs ASMI of the suspension, and sets up a re-evaluation to verify non-conformance resolution and that the approved applicant has put in place systems that ensure that non-conformance does not reoccur.

MAJOR	This level indicates that there is a substantial failure to meet the Standard.  For example, the traceability system is found to be flawed, or the applicant has failed to meet the requirements of the Statement of Intent or any clause of the Standard.	Certification Body does not issue certification until all non-conformances are corrected.
MAJOR (Surveillance Audit)	This level indicates that the non-conformance fails to	Certification Body will inform the approved applicant of this Major Non Compliance and will

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	<p>comply with the principles of the Standard.</p>	<p>ask for an action plan to rectify this area of Non Compliance. If no action plan is forthcoming or it is in the view of the Certification Body not going to rectify the issue, the approved applicant will have its certification suspended (pending an investigation), CB informs ASMI of the suspension, and will set up a re-evaluation to verify non-conformance resolution, to ensure that the approved applicant has put in place systems to prevent the recurrence of the non-conformance.</p>
<p>MINOR</p>	<p>This level indicates that actual compliance to the Statement of Intent has not been met, but objective evidence shows that the conformity of the product is sound.</p>	<p>Certification Body does not issue the certification until all non-conformances are resolved and closed out.</p>
<p>MINOR (Surveillance Audit)</p>	<p>This level indicates that the non-conformance fails to comply with the principles of the Standard.</p>	<p>Certification Body will inform the approved applicant of this Minor Non Compliance and will ask for an action plan to rectify this area of Non Compliance by the time of the next surveillance audit. If no action plan is completed at this next surveillance audit the Non compliance will be reclassified as a Major Non compliance and</p>

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		will follow that course of action to remedy the identified issue
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### 7.3 Closing Meeting

In the closing meeting, the assessor presents his or her findings to the applicant to seek concordance in regard to the identified non-conformances to the Alaska RFM CoC standard. As a result of this discussion, the assessor will prepare a written, signed copy of the agreed-upon non-conformances for the applicant’s technical representative. At this time, the assessor will not give confirmation as to whether the applicant has achieved certification.

If a critical non-conformance is established at the closing meeting, during an annual surveillance audit the approved member of the program will be instructed to immediately inform its customers of the situation. Additionally, the existing member will be required to provide its customers with information regarding the corrective action that will be taken to regain certification.

*Note: As necessary, operation assessments can be conducted in a foreign language; however, all notes resulting from the assessment must be translated into English and the Final Assessment Report must be written in English.*

### 8.0 Customer Notification of Traceability and Legality Issues

Many purchasers request that they be immediately notified by the Certification Body in the event of serious traceability or legality issues resulting from a supplier inspection (assessment). When this occurs, the Certification Body will determine, with the applicant, the best means for honoring the purchaser’s request.

In all cases, copies of the Assessment Report can only be sent to a third-party entity if the report owner, that is the applicant, has given written consent to do so.

### 9.0 Annual Surveillance Audit Scheduling

Surveillance audits are typically scheduled during the 12-month period occurring directly after the initial audit. An audit window either side of this date by up to 4 calendar months can be used to ensure that product is being processed/packed/handled. However there must a minimum of 6 months between audits.

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However, the Certification Body ultimately reserves the right to determine Surveillance Audit frequency based upon the inherent product/process risk as well as the results of an applicant's Pre-assessment.

Additionally, verification of the corrective actions taken in response to critical and major non-conformances will only be scheduled during the time when the relevant product is being manufactured.

### 9.1 Re-certification Audit Scheduling

The approved applicant must apply for the re-certification audit at least two months before the current certificate is due to expire, in order to allow sufficient time to complete the Audit and recertification before the expiration date arrives.

### 10.0 Issuance of Assessment Reports

A written assessment report issued in the approved format will be sent to the applicant following an assessment. The report will contain a general summary, a performance overview, a summary of non-conformances and the subsequent corrective actions taken, and comprehensive details demonstrating how the applicant is in compliance with the Alaska RFM CoC Standard.

### 11.0 Non-conformance Follow-up

In accordance with requirements in the Certification Body's certification system, the applicant must notify the Certification Body, detailing the specific actions that have been taken to correct the critical, major and minor non-conformances that were identified during assessment. Depending on the nature of the non-conformance, the applicant will either supply documentary evidence to the Certification Body or schedule a re-assessment. All this must be completed before a Certificate of Approval can be awarded.

After fifteen (15) calendar days from the date of the assessment, the Certification Body shall check the applicant's file and evaluate the progress of the corrective actions. As needed, the Certification Body will contact applicants and remind them of their obligation to provide evidence of corrective action taken within the requisite twenty-eight (28) working-day time frame. All non-conformances must be closed out within the twenty-eight day period, unless an applicant's request for extension has been submitted and approved.

### 12.0 Final Assessment Report

The assessor will review all evidence submitted by an applicant and evaluate its compliance to the Standard. Then, the assessor prepares a Final Assessment Report and submits it to the

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Certification Body program manager/administrator for the Alaska RFM CoC Program for sign-off.

In the report, the program manager/administrator will verify the following:

- a) That the assessor's notes fully substantiate any non-conformances raised in the final Assessment Report and that a copy of the non-conformances have been placed in the applicant's file;
- b) That the assessor's report of non-conformance was not recorded as a statement of corrective action or direction;
- c) That the report includes all agreed-upon and authorized time frames of corrective action by applicant and assessor and their dates for closure; and
- d) That the evidence of all corrective action taken by the applicant since the assessment is identified and included in the report.

The Certification Body program manager/administrator then submits the report with the file of documented evidence to the Certification Committee / Officer for review to determine if the applicant has complied with all clauses as laid down in the Alaska RFM CoC Standard.

Once final approval is given, the Certification and a copy of the final Assessment Report are sent to the applicant within three (3) working days of the Certification meeting. The applicant recipient is defined as the party paying for the assessment.

Applicants can be awarded one of the following certification types:

- a) *Certification Achieved*
- b) *Certification Not Achieved*
- c) *Certification Not Granted*

In the case of *Certification Not Achieved*, the applicant will be required to provide some additional information requested by the Certification Committee / Officer and will have a maximum of seven (7) working days from notification to submit the information.

In the case of *Certification Not Granted*, the applicant has failed to produce enough evidence to provide assurance to the Certification Body's certification committee that it has all the systems in place to meet the requirements of the Alaska RFM CoC standard.

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### 13.0 Issuance of Certificates

The issuance of the assessment certificate to an applicant is governed by Certification Body's Senior Manager who oversees all accredited certification programs. The certificate will be in the Standard's approved format and include following:

- a) Certification Body's name, address and accreditation;
- b) Applicant name;
- c) Applicant mailing address;
- d) Chain of Custody certification standard and scope;
- e) Seafood product categories covered by the certificate, stating the fish species;
- f) Assessment date;
- g) Certification Issue date;
- h) Certification Expiry date;
- i) Chain of Custody Official Code Number (Eg: COCALAXX date); and
- j) Authorizing signature.

Once issued, the Certification Body remains in possession of the certificate at all times.

Further, if any substantial changes occur to the applicant's premises or products, the applicant must provide immediate written notification of these changes to the Certification Body. Further, it is understood by the applicant that changes to the premises or products could result in the revocation of the present certification status.

### 14.0 Applicant Records

Thirty calendar days after the Certification Committee meeting, the Certification Body will review the applicant's file to verify that all required documents have been placed in the file.

For a period of five years, the file will maintain the following documents in either hard copy or electronic file format. The applicant is also expected to maintain an identical file for the same period of time:

- a) Application form;
- b) Site-visit confirmation letter;
- c) Site-visit schedule;
- d) Assessor authorization to conduct assessment, as applicable;
- e) Assessment report forms;
- f) Letters detailing non-conformance, as applicable;
- g) Applicant responses on corrective actions take;
- h) Assessor confirmation of non-conformance close-outs;

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- i) Minutes of certification meetings and reviewers comments;
- j) Applicant notifications of certification decision;
- k) Final Assessment Report;
- l) Certification and acknowledgement of receipt.

Per the program's internal review process, the Certification Body's Internal Assessor will schedule and conduct a review of the applicant's completed file.

[www.alaskaseafood.org](http://www.alaskaseafood.org)

[rfm@alaskaseafood.org](mailto:rfm@alaskaseafood.org)