



RFM Quality Management System (QMS)

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

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1. INTRODUCTION

1.1

This manual details the Quality Management System (QMS) for the Alaska Responsible Fisheries Management (RFM) Certification Program. Supporting the 'RFM Standards' and 'Scoring Documents,' and further supported by a 'Standard Forms' manual, this manual outlines the Policies and Controls for the auditing, evaluating, certifying, and accrediting processes of the RFM Program.

1.2

This RFM Program is owned and managed by the Alaska Seafood Marketing Institute (ASMI). The structure of the operating, certification and control procedures is described herein.

1.3

The RFM Program and Standards management review, may consider and follow the general best practice criteria and guidance outlined in the following documents:

- a) World Trade Organization, Technical Barrier to Trade Agreement, Annex 3 – Code of Good Practice for the Preparation, Adoption and Application of Standards;
- b) ISO Guide 59:1994 Code of Good Practice for Standardization;
- c) ISO 17067:2013 Conformity Assessment — Fundamentals of Product Certification and Guidelines for Product Certification Programs;
- d) ISEAL Code of Good Practice for Setting Social and Environmental Standards v5.0,2010;
- e) ISEAL Code of Good Practice for Assuring Conformance with Social and Environmental Standards, 2012;
- f) ISEAL Code of Good Practice for Assessing the Impacts of Social and Environmental Standards, 2013;
- g) FAO Guidelines on Bycatch Management and Reduction of Discards (2011);
- h) FAO Guidelines for the Ecolabelling of Fish and Fishery Products from Inland Capture Fisheries (2011);
- i) FAO Guidelines on the Management of Deep Sea Fisheries on the High Seas (2008);
- j) FAO Voluntary Guidelines for Securing Sustainable Small Scale Fisheries in the Context of Food Security and Poverty Eradication (2014);
- k) ISO 17065 the Standard for Certification Bodies Operating Certification;
- l) The FAO Code of Conduct for Responsible Fisheries 1995;
- m) The FAO Guidelines for the Eco-labelling of Fish and Fishery Products from Marine captured Fisheries; and
- n) The GSSI Benchmark Tool for Seafood Certification Programs (Version September 2015);
 - o) ISO 17030- Conformity assessment- General requirements for third-party marks of conformity 2003

1.4 The principal objectives of the RFM Program are as follows:

- a) To provide, through the operation of the RFM Certification Program, the means by which a range of 'Certified RFM' Alaskan fisheries products can be supplied to buyers and, through them, to consumers;

- b) To demonstrate by a Certificate of Approval, or a Certified Seal, or a Certified Statement of Conformity, assurance that the products have been harvested, produced, or prepared for marketing by clients who comply with RFM standards, procedures, and practices approved by ASMI;
- c) To provide the means by which fisheries organizations may demonstrate independent assurance that the management system under which they operate conforms to specified Best Practices Fishery Management requirements;
- d) To provide cost effective services by which both large and small businesses can supply the marketplace with 'RFM Chain of Custody' certified products; and
- e) To promote the principles of responsible fisheries management.

1.5 There are two RFM Standards:

- a) Alaska Responsible Fisheries Management Standard and
 - b) RFM Chain of Custody Standard
- The current standard versions are available on the ASMI website (add link)

All certifications will be to the latest version of the standard and follow the procedure in document 2. If a fishery or supply chain organization is certified to an earlier version of these standards their current certificates will still be valid until they expire. At this stage the fishery or supply chain organization will be asked to re-apply for certification to the latest approved version of the relevant RFM standard

To maintain certification under these standards both the fishery and supply chain organization will be subject to on-going surveillance assessments.

1.6 This manual will be accessible online via the ASMI website. The content of this manual will be subject to annual review as part of the Program's Internal Quality System Review.

1.7 ASMI makes information about the Program's governance structure, ownership, standards and standard-setting procedures, and the composition, operating procedures, and responsibilities of its governance bodies, freely and publicly available. This information may be found on the ASMI website at www.alaskaseafood.org.

2. RFM POLICY STATEMENTS

2.1 General RFM Policy Statement

The purpose of the RFM Program is to provide the fishing industry with a Certification of Responsible Fisheries Management at the highest level of market acceptance. Certification to requirements under the RFM Program will demonstrate a commitment that will communicate to customers and consumers the responsibility of fisheries and fisheries management authorities in accordance with internationally agreed standards and guidance provided by the United Nations Food & Agriculture Organization.

The RFM Program policy is founded on a commitment by seafood stakeholders in Alaska to provide and support a responsible fisheries management standard and certification framework for Alaska seafood that meets customer and market expectations and meets ISO accreditation standards. ASMI is committed to provide, through the facilitation of the RFM Standards and Certification Program, the

means by which Alaska seafood can be validated as having been harvested under 'Responsible Management,' from the fishery to the customer.

The RFM standard is applicable to governance and management systems for small scale and/or data limited fisheries, where appropriate, provided their performance can be objectively verified, with due consideration to the availability of data and the fact that management systems can differ substantially for different types and scales of fisheries.

2.2 Key Performance Indicators for RFM

ASMI is committed to provide and facilitate cost effective, practical, and responsible certification standards and services, by which both large and small businesses can supply the marketplace with assured and certified products.

There are no mandatory requirements that require a fishery operation to be certified in order to access any markets.

ASMI is committed to providing the direction and means to implement the RFM Quality Policy through the following objectives:

- a) To be recognized as a leader in Responsible Fisheries Management certification;
- b) To facilitate and maintain ISO 17065 accreditation for the RFM Standards Program;
- c) To facilitate and maintain GSSI benchmark approval requirements for the RFM Standards Program;
- d) To provide open, effective communication with seafood customers, interested parties, and committees;
- e) To provide systematic validation and control of RFM quality processes; and
- f) To provide a system for assessing fisheries that voluntarily submit to certification, through positive engagement with the key bodies responsible for Fisheries management, research, trade and industry, environment, consumer etc.

2.3 Program Review

The RFM Standard Program policy and procedures are reviewed on an annual basis to ensure their relevance and to verify that they continue to meet the demands of the global marketplace. The review will include; findings, cause analysis, preventive and corrective actions with deadlines and responsibilities, as applicable. The resulting corrective actions could instigate a revision of the relevant operating policies and procedures, as applicable, with specified time frames.

ASMI ensures that this management review is fully documented, is carried out with the involvement of interested parties and directly affected stakeholders, and addresses any relevant issues of concern raised by stakeholders (See Procedure 7). These could be raised via comments submitted directly to ASMI through the available comments submission tool in ASMI's website or during the open public comment periods.

2.4 Management and Control

The RFM Program has established, and will maintain, an independent effective certification assessment system based on ISO 17065, to ensure that the certification bodies operate in a consistent and

controlled manner and so that participants manage their businesses and market their products in full conformity with the criteria defined in the RFM Program standards.

In support of its policies and through this Quality Management System and supporting procedures, the RFM Program has established and will maintain a system of documentation and control procedures, coupled with regular reviews, to ensure that it facilitates an efficient and cost effective certification service to the industry it serves.

This manual also serves as a management control manual and a training manual. It's policy that RFM staff and relevant parties are made aware of the QMS and procedures and controls, and adhere to the systems defined to ensure their effective operation.

ASMI is fully committed to the above policies and performance targets.

Signed:

Date:

ASMI Sustainability Director

Signed:

Date:

ASMI Board Chairperson

3. PROGRAM STATUS, STRUCTURE AND FINANCES

3.1 History

The RFM Program was developed and adopted in 2010 as a result of market requests. The aim of the initial project was to deliver a high integrity, ISO model for the certification of Responsible Fisheries Management (RFM) based on existing and widely accepted UN FAO Fisheries Management models and guidance documents.

The Scope of the RFM Program Standard includes:

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

In 2010 ASMI created an open tender call, and from that tender process engaged a Standards and Certification Company (Global Trust Certification) to develop a standards framework and certification system.

The task was to create the Alaska RFM Program as an independent, third party certification of 'Responsible Fisheries Management' according to the UN FAO Code of Conduct for Responsible Fisheries 1995 and the UN FAO Eco-labelling Guidelines 2005 and 2009. The FAO documents are available from the FAO website: <http://www.fao.org/docrep/005/v9878e/v9878e00.HTM>.

The emerging RFM Standards were created by an independent group of experts composing the Alaska RFM Committee. <http://certification.alaskaseafood.org/conformance-criteria>

There were two standards developed:

1. Alaska Responsible Fishery Management Conformance Criteria and;
2. RFM Chain of Custody Standard.

The scope of the standards includes any Alaska fishery, any fish species, all production systems/gear types, geographical locations, company structures (single units, groupings of sites/boats, small-scale fisheries, subcontractors, product categories, packers, processors, storage and distribution).

The historic and present Conformance Criteria Committee (CCC) members are listed on the ASMI Website. Members are volunteers and are not paid for their time or effort in developing the RFM Standards.

The latest Alaska RFM Standard V1.3 was recommended by the Conformance Criteria Committee in August 2015 and approved by the ASMI Board in Oct 2015, and is directly derived from the FAO documents referenced.

As part of the FAO-based concept of the RFM Standard, it is understood that, upon changes to FAO key reference documents, the Alaska RFM Standard V1.3 will be reviewed annually and, where relevant and appropriate, a new version of the standard will be developed accordingly.

The latest Alaska Chain of Custody standard V 2.4 was recommended by the Technical Committee in XX(month) 2015 and approved by the ASMI Board in Oct 2015, and has been developed from the FAO Based RFM Chain of Custody Standard V 2.3.

3.2 The Certification Process

The certification process was developed to conform with ISO 17065 accreditation requirements. Initially one Certification Body was approved by ASMI, and it gained accreditation in 2012 with the Irish National Accreditation Board (INAB). Currently (2015), there are more approved Certification Bodies, which have followed the Alaska RFM Program Approval Process for Certification Bodies and are seeking accreditation through their relevant Accreditation Board.

Certification Bodies accredited to ISO 17065 or in application for accreditation:

- a) Global Trust Certification / SAI Global (Ireland)
- b) SCS Global (USA)

The Program is open to further ISO accredited Certification Bodies that wish to seek formal approval to become active in the RFM Program and ASMI facilitates training, to educate Certification Bodies in the details of the Program.

3.3 Program Development

In June 2014, ASMI formally reviewed the RFM Program as part of its commitment to continuous program improvement, and as a result, ASMI published a Program of Improvement Plan (Procedure 3, RFM Program of Work).

ASMI opened a formal 60-day Public Comment Period for the RFM Standards and Scoring Guidance commencing in Dec 2014. Comments were submitted by interested parties for review and consideration by the RFM Conformance Criteria Committee.

ASMI keeps on file for a period of at least one full standards revision the following records related to each standard development or revision process:

- a) Policies and procedures guiding the standard-setting activity;
- b) Lists of stakeholders contacted;
- c) Interested parties involved at each stage of the process;
- d) Comments received and a synopsis of how those comments were taken into account; and
- e) All draft and final versions of the standard.

3.4 Program Governance Structure

The FAO Guidance references require the governance structure of scheme owners to be transparent, credible and robust, and to have clear written rules and procedures for decision-making processes and scheme oversight.

ASMI utilizes the skills of four key Committees for RFM Management and Governance:

- 1. The ASMI Board of Directors**
- 2. The ASMI Conformance Criteria Committee**
- 3. The ASMI RFM Committee**
- 4. The ASMI Technical Committee**

ASMI also uses a Public Comment exercise to gain wider stakeholder and public viewpoints.

The Terms of Reference (TORs) for each of these are detailed in separate TORs and these should be referred to for specifics of experience and affiliations. The Bios of the ASMI Board, Conformance Criteria Committee and RFM Committee are available on the ASMI Website. Below is a summary of the Governance for RFM.

3.4.1 ASMI Board of Directors

ASMI Board is the overall governance body for the RFM Program with ultimate decision making authority. ASMI is established by, and operates under, State of Alaska law and regulation. ASMI is thus bound by State conflict of interest, open meeting and other regulations.

The TOR for ASMI are set by State Statute. The TOR relevant to the RFM program have been created and are available on the ASMI website.

The ASMI Board is established by State of Alaska statute. State statute and regulation establishes the mission, appointments process, criteria for board members selection, voting structure, etc. As a result, the ASMI board is independently chosen and operates in accordance with criteria established by law.

The Board members are appointed by the Governor of Alaska, after an open and transparent recruitment process. The recruitment process is conducted by the Governor's office in accordance with established State procedures. There is wide stakeholder consultation and opportunity to participate in this process.

The current list of ASMI Board members and their affiliation and summary membership categories are as follows:

Board Members

- Barry Collier, Chair, Peter Pan Seafoods, Inc. – **Seafood Processor**
- Tomi Marsh, Vice-Chair, Harvester - **Fisher**
- Vacancy, Large Processor – **Seafood Processor**
- Kevin Adams, Harvester, **Fisher**
- Mark Palmer, Ocean Beauty Seafoods – **Fisher/ Seafood Processor**
- Allen Kimball, Trident Seafoods – **Fisher / Seafood Processor**
- Jack Schultheis, Kwik' Pak Fisheries – **Fisher / Seafood Processor**

ASMI Board meetings are conducted in accordance with State of Alaska law and regulation ([AS 44.62.310](#)). Meetings are announced through official public notice procedures and are open to the public.

ASMI Funding is provided through legislative appropriations by the Alaska State Legislature. Funding comes from a tax assessed by the State of Alaska on Alaska seafood products. This ensures that funding is independent of Board membership or RFM Program decision-making.

The ASMI Board ensures that the RFM Program and the program management remain relevant to governance Policies and Procedures and stay consistent with UN FAO key reference documents as part of the necessary annual program review.

The ASMI Board established two key advisory bodies for the RFM program.

3.4.2 The RFM Committee –

This Committee has a specific Terms of Reference which is available on the ASMI website. Members are appointed by the ASMI Board. The RFM Committee constitutes the Oversight and Management Committee for the RFM Program. The Committee devises recommendations for RFM policy, strategy and targets to present to the ASMI Board for approval.

RFM Committee meetings are conducted in accordance with Alaska State law and are open to the public and transparent. The Committee meetings are open and accessible to all interested parties, and stakeholders can make suggestions directly to the Committee and participate in or provide direct input to the committee agenda during these public meetings. Meeting minutes are publicly available.

The ASMI Board of Directors appoints the RFM Committee members and determines the number of voting members. The Committee shall be chaired by an 'ASMI Board appointed' Chairperson. ASMI Staff will attend meetings and the Sustainability Director will act as secretariat. ASMI staff holds no voting rights. One ASMI Board Member will serve on the RFM Committee.

The RFM Committee representation will be adapted from time to time to ensure it continues to represent the interests of the fishery regions, sectors and fisheries.

Members of the RFM Committee include persons knowledgeable and experienced in Alaska fisheries. Representation includes individuals from all of the major fisheries in Alaska, fishery communities, and individuals independent of specific fisheries who have knowledge and experience in areas of fishery management, science, or other desirable disciplines. There is broad representation on the committee, and no particular interest group, fishery sector or region has a majority voice.

3.4.2.1 The RFM Committee –

The current RFM Committee, summary affiliations and membership categories are listed below:

- **Larry Cotter**, Chair, APICDA – Community Development Quota Organization / Community Representative with investments in Harvesting, processing and other business interests – **Community**
- **Glenn Reed**, Pacific Seafood Processors Association - multi-fishery/species processor trade: **Onshore and Floating Seafood Processors**
- **Duncan Fields**, - current NPFMC rep small GOA processor and community interests **Independent Consultant**
- **Stefanie Moreland**, Trident Seafoods Corp, Former ADFG Deputy Commissioner now representing Trident multi species/multi region harvester and processor – **Fisher / Seafood Processor**
- **Jim Gilmore**, At-Sea Processors Association - Bering Sea Pollock fishery trade Association - **Fisher / Seafood Processor**
- **Ron Rogness**, American Seafoods Group LLC – representing Large Vertically Integrated catcher and processor – Pollock, cod and yellowfin sole - **Fisher / Seafood Processor**
- **Mark Gleason**, Alaska Bering Sea Crabbers – multi species crab - **Fisher / Seafood Processor**
- **Jason Anderson**, Alaska Seafood Cooperation, Groundfish Complex — **Fisher / Seafood Processor**
- **Tomi Marsh**, ASMI Board Member, Harvester – **Fisher**
- **Dave Benton**, Member U.S. Arctic Research Commission, Former Deputy Commissioner ADF&G - **Consultant**

Profiles for each of the RFM Committee members are available on the ASMI Website.

RFM Committee meetings are conducted in accordance with State of Alaska law and regulation ([AS 44.62.310](#)). Meetings are announced through official public notice procedures and are open to the public.

3.4.3 RFM Conformance Criteria Committee

This Committee has a specific Terms of Reference which is available on the ASMI website. Members are appointed by the ASMI Board, and there can be up to nine members to include national and international experts in fishery science, management, and sustainability.

Membership includes a broad range of interests and experts from state and federal management agencies, science institutions, NGOs, etc.

The current CCC membership, summary affiliations and member categories include:

- **Dr. William Smoker, Chairman**, Independent **Consultant** (USA)
Emeritus Professor at University of Alaska Fairbanks, Director of Prince William Sound Aquaculture Association, Member of the American Fisheries Society, Fellow of the American Institute of Fishery Biologists
- **R.J. (Bob) Allain**, Independent **Consultant** (Canada)
Ex Regional Director with Canada DFO
- **Dr. Norman Graham**, Marine Institute, **Research** (Ireland)
Chair European Commission Scientific, Technical and Economic Committee for Fisheries (STECF)
- **Meredith Mendelson**, Maine Department of Marine Resources, **Government**
Deputy Commissioner for Maine DMR
- **Dr. Tom Pickerell**, SeaFish UK, **Semi-Government** (UK)
Technical Director of Seafish. Ex Seafood Science Manager for Seafood Watch, MBAY Aquarium
- **Suzanne Iudicello**, Independent **Consultant** (USA)
Ex ADF&G, Alaska Legislature
- **Eric Schwaab**, National Fish & Wildlife Foundation, **Environmental** (USA) VP Conservation Programs. Ex NOAA Director
- **Wendy Norden**, Monterey Bay Aquarium, **Environmental** (USA) Science Director, Seafood Watch Program

Full profiles for each of the CCC members are on the ASMI Website.

Proposals for new CCC members have been raised and are in the process of consideration.

The CCC provides technical expertise, advice, recommendation and guidance on the RFM Program Standards, structure, criteria, and operation, as charged by the ASMI Board. The Committee is responsible for the re-editing of RFM Standards and it strives for decisions by consensus, but operates by 2/3 vote when consensus is not attainable.

The CCC reviews and creates responses to Comments received during Open Comment Periods. There is a specific TOR for the Open Comment Management available on the ASMI Website. All relevant comments received will be considered in the CCC's review of the RFM Standards during the revision process according to the TOR and Standards Revision Process.

The CCC meetings are conducted in accordance with State of Alaska law and regulation (AS 44.62.310). Meetings are announced through official public notice procedures and are open to the public.

Decisions of the CCC are advisory to the ASMI Board.

3.4.4 ASMI Executive Team

This is the Senior Management Team within ASMI.

The ASMI Executive Team and staff are not directly engaged in the operational affairs (auditing, evaluation, and certification of applicants) within the RFM Program.

The Executive Team is managed by the Executive Director. The Sustainability Director is responsible for the budgets and resource management for the RFM Program and reports to the Executive Director and to the ASMI Board.

3.4.5 The Sustainability Director

The Sustainability Director manages the RFM Program and the RFM Team. The Program derives support from contracted experts and administrative staff.

The Sustainability Director is the central point of contact for RFM standards-related inquiries and communications.

3.4.6 The ASMI Marketing Team and Overseas Marketing Representatives:

ASMI has an International Marketing Team with translation ability. This team provides resource for translating RFM materials and website content, and for checking accuracy of translations.

3.4.7 ASMI Contract Experts/RFM Team

ASMI engages experts (Certification, Accreditation, Fisheries Management) to assist with RFM Program management. These contract experts report to the Sustainability Director and together they form the RFM Team. This team is responsible for maintenance of the Quality Management System and for facilitating the technical and operational requests of the Committees and facilitating the technical and training needs of Certification Bodies, Accreditation Bodies, Applicants and Clients.

Further details of key roles are available on the ASMI Website.

3.4.8 Approved Certification Bodies

These are approved and independent Certification Bodies engaged in assessing and certifying RFM Fishery and Chain of Custody Applicants. The Certification Bodies are initially approved by ASMI on the basis that they are experts in Seafood certification; accredited to ISO 17065 and are seeking accreditation extension for RFM Standards.

The procedure for Certification Body approval and details of the assessment and certification procedure that all Certification Bodies must follow are available on the ASMI website. ASMI stipulates the conditions under which the Certification Body will be reviewed and continuously approved.

The contracts for actual assessment and certification are between the applicant and the Certification Body. Certification Bodies may be approved for Alaska RFM Standard, RFM Chain of Custody or both. Insurance coverage (field and volume) for liability is included in the Certification Body requirements documents.

3.4.9 Accreditation Bodies

These are formal and nationally recognized accreditation entities that are members of the International Accreditation Forum. They are engaged in assessing and accrediting Certification Bodies to the ISO 17065 criteria.

The RFM Team liaises with the Accreditation Boards to ensure consistency of approach and training on the RFM Standards and Process interpretation.

The contracts for accreditation are between the Certification Body and the Accreditation Board.

3.4.10 Fishery Applicants

These are organizations representing all the relevant parties in the Fishery applying for RFM assessment and certification to the RFM Fishery Management Standard

No one party can represent all the functions of fisheries management. The Fishery Applicant will not be expected to be responsible for all the activities but will act as a facilitator for all parties as part of the application and assessment.

The Fishery Applicant engages directly with approved Certification Bodies.

3.4.11 Chain of Custody Applicants

These are organizations applying for RFM assessment and certification to the Chain of Custody Standard.

The Chain of Custody applicant engages directly with the Certification Body.

Certified applicants can apply to ASMI for use of the Alaska RFM Certified Seal.

Terms of Use agreements with ASMI clearly define the use of the Alaska RFM Certified Seal.

A copyright protection in the countries of activity, and or an active market surveillance program, is in place for the RFM Certified Seal. ASMI has a written policy and procedures for permissible use and sanctions for misuse. Implemented sanctions are kept on file.

3.5 Transparency of Financial Relationships between RFM Bodies

3.5.1 ASMI

ASMI is a legal entity of the State of Alaska; it is separate from the Certification Bodies and Accreditation bodies that operate the RFM assessment and certification process. Board members receive no salary, but are entitled to per diem and travel expenses

3.5.2 Certification Bodies

Certification Bodies are separate legal entities from ASMI and Fishery Applicants and derive their finances directly from the assessment of fisheries and supply chain organizations.

3.5.3 Accreditation Bodies

Accreditation Boards are separate legal entities from ASMI and all other RFM parties and derive their finances from the assessment and accreditation of Certification Bodies.

3.5.4 Conformance Criteria Committee

Conformance Criteria Committee members are individuals with no legal employment or financial ties to ASMI or the Fishery Applicants. They derive their finances from employment with other organizations or through declared and non-conflicting consulting services. Committee members receive no salary for their role in Committee, but are entitled to per diem and travel expenses.

3.5.5 RFM Committee

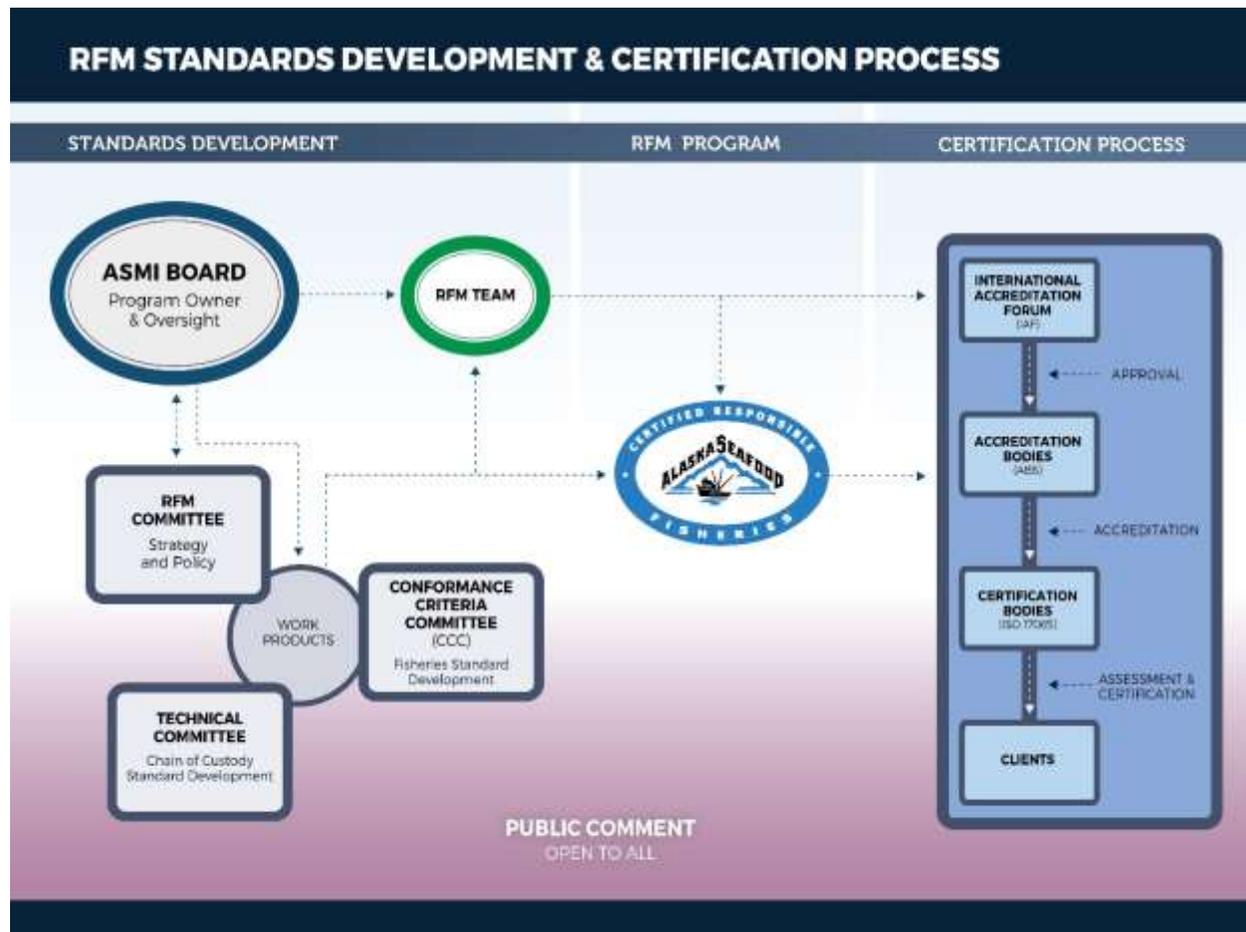
RFM Committee members are individuals with no legal employment or financial ties to ASMI. They derive their finances from employment with other organizations or through declared and non-conflicting consulting services.

Committee members receive no salary for their role in Committee, but are entitled to per diem and travel expenses.

3.5.6 Applicant Bodies

Applicant bodies are separate legal entities from ASMI, Certification Bodies and Accreditation Bodies and pay for the costs of assessment directly to Certification Bodies.

4.0 GOVERNANCE ORGANIZATIONAL STRUCTURE



The Alaska Seafood Marketing Institute (ASMI) Board of Directors is the RFM Program owner and the approving body for all standards, strategy and policy related to the RFM Program.

Three advisory committees work with the RFM Team and have input into the RFM program. These committees make policy and work product recommendations to the ASMI Board for approval.

The RFM Team is made up of ASMI staff and expert consultants who manage the operations of the program and work with all three committees and the Board on RFM matters, including Standards Development.

The RFM seal in this diagram represents the RFM Program.

Advisory Committees:

The **RFM Committee** is appointed by the AMSI Board and makes Program strategy and policy recommendations to the Board. The RFM Committee receives work products from the Technical and

Conformance Criteria Committees and reviews recommendations made by each, which are then forwarded to the ASMI Board for final approval.

The **Technical Committee** is appointed by the Board and oversees the ongoing review and development of the Chain of Custody Standard.

The **Conformance Criteria Committee** is appointed by the Board and oversees the ongoing review and development of the Fisheries Standard.

Certification Process:

Accreditation Bodies are approved by the International Accreditation Forum. Accreditation Bodies extend accreditation to Certification Bodies. Certification Bodies assess and certify the client fisheries and chain of custody clients of the RFM program.

Public:

All ASMI Board Meetings and Committee Meetings are open to the public and are made public record. The RFM staff members are available to the public. There are additional opportunities for the public to provide comments or ask questions about the RFM Program and/or participate in the fishery certification process both through formal public comment periods and via the ASMI website.

5. RFM STANDARDS ADMINISTRATIVE STRUCTURE

Under the structure of the RFM Program, the RFM Committee drafts the vision, strategy and timeline targets for Standards Development. These are approved by the ASMI Board. The administrative structure for the RFM Standards management is as follows:

5.1 ASMI RFM Program Team

5.1.1 The ASMI RFM Program Team is led by the ASMI Sustainability Director, who reports to the ASMI Executive Director, who in turn reports to the ASMI Board of Directors. The ASMI Sustainability Director is responsible for facilitating:

- the RFM Committee and implementing the policies, procedures and controls recommended by this Committee and approved by the ASMI Board.
- the RFM Conformance Criteria Committee, which is responsible for the RFM Fisheries Standard development process and recommending changes to the RFM Standards for final approval by the ASMI Board
- the ASMI Technical Committee, which is responsible for the RFM Chain of Custody Standard development process and recommending changes to the RFM Standards for final approval by the ASMI Board

5.1.2 The ASMI RFM Team is composed of the following personnel:

- a) ASMI Sustainability Director;
- b) ASMI contracted experts; and
- c) ASMI RFM Program Administrators (deputized by the Sustainability Director).

5.2 The Conformance Criteria Committee

5.2.1 The ASMI Board of Directors appoints the members and chairperson of the Conformance Criteria Committee.

5.2.2 Further Conformance Criteria Committee members can be suggested by other Committee members, or other parties, for approval by the ASMI Board of Directors.

5.2.3 All Conformance Criteria Committee meetings are open to the public and transparent. Members of the public have the opportunity to speak at all open meetings and address the Conformance Criteria Committee.

5.2.4 ASMI acts as the secretariat for the Conformance Criteria Committee but is not a voting member. ASMI will maintain the records of the Committee and development activity.

5.2.5 It is the principal role of the Conformance Criteria Committee to make recommendations to the ASMI Board to revise/update the RFM Program Standards as necessary, based on expertise, external comments, and new legislations and guidance, to keep the RFM Standards relevant and in line with the FAO key Reference documents.

5.2.6 It is also vital that the RFM Standards are maintained in an auditable and practical format. Once the Standards have had an open comment period and have been recommended for approval by the Conformance Criteria Committee, the Standards are approved by the ASMI Board of Directors and passed along to relevant accreditation boards for accreditation conformance review.

5.2.7 The Conformance Criteria Committee can create or use an existing sub-committee (ASMI Technical Committee) to manage the review and suggested edits of the Chain of Custody Standard.

5.2.8 The Conformance Criteria Committee is composed of members with a range of technical expertise in fisheries, and environmental management.

5.2.9 The constitution of the Conformance Criteria Committee, its terms of reference, rules of procedures, and a list of members together with their professional affiliations, are given in the CCC Terms of Reference available on the ASMI Website.

6.0 ORGANIZATION OF ‘ASSESSMENT’ AND ‘CERTIFICATION’ ACTIVITIES

6.1 The ASMI Executive and RFM Team

The RFM Team is led by the Sustainability Director.

6.1.1 The ASMI RFM Team is responsible for facilitating the RFM Procedures and Controls, which Certification Bodies must follow. These protocols are endorsed by the RFM Committee for approval by the ASMI Board

6.1.2 The ASMI Executive Director or Sustainability Director is responsible for the initiating approval and continuing management of Certification Bodies seeking to operate within the RFM Program. Certification Bodies are expected to meet levels of service to their clients.

6.1.3 The ASMI RFM Team is responsible for acting as the liaison with Certification Bodies on any operational queries.

6.1.4 The ASMI RFM Team is responsible for coordinating the annual review of the RFM Fishery certification Program and publishing the proposed 'RFM Conformance Criteria Committee Program of Work.'

CERTIFICATION

6.1.5 The ASMI RFM Team requires Certification Bodies to maintain a written fee structure that is available on request and is adequate to support accurate and truthful assessments commensurate with the scale, size, and complexity of the fishery or chain of custody.

6.1.10 ASMI RFM Team requires that accredited Certification Bodies have certification procedures and guidance for multi-site certifications.

6.1.11 ASMI RFM Team requires Certification Bodies to use consistent formats for audit reports and reporting.

6.1.12 ASMI RFM Program requires that Certification Bodies have in place consistent procedures for stakeholders to provide input during the certification process.

6.1.13 ASMI RFM Program requires that Certification Bodies solicit stakeholder input during the full fishery assessment or reassessment and surveillance audit process. Under a full assessment or reassessment only, the Certification Bodies will announce the commencement of the process and provide a 30 day time period for stakeholders to register. Registered stakeholders will be consulted during the assessment within a target 30 day period.

6.1.14 ASMI RFM Program will require Certification Bodies to make publicly available for comment a draft of the full assessment or reassessment audit report, prior to the certification decision, (excluding commercially sensitive information). Following a draft report publication, there will be a 30 day comment period open only to registered stakeholders who were registered during the previous consultation process. ASMI RFM Program will require Certification Bodies to respond to all comments received by registered stakeholders.

6.1.15 ASMI RFM Program requires that Certification Bodies use a consistent procedure for determining non-compliances, for verifying corrective actions arising from non-compliances, and for allowing for appeals of non-compliances.

6.1.16 ASMI RFM Program requires that the scope of the full assessment or reassessment include a visit to locations pertinent to the scope of the certification.

6.1.17 ASMI RFM Team maintains and ensures a list of certified enterprises for chain of custody is made publicly available via ASMI website.

6.1.18 ASMI RFM Program requires Certification Bodies to make summary fishery management audit reports available on request after certification has been granted, while excluding commercially sensitive information.

6.1.19 ASMI RFM Team makes fishery audit reports public available via ASMI website (excluding commercially sensitive material) after certification has been granted.

6.1.20 ASMI RFM Team notifies Certification Bodies, Accreditation Boards, and certified enterprises of any change in management procedures, which affects program rules and procedures for accreditation or certification.

6.1.21 Where there is certification of an entity with non-conformances, ASMI requires from Certification Bodies that:

- a) A timeline for closing out corrective actions must be defined;
- b) Only non-conformities on minor, non-critical issues are allowed; and
- c) A system to verify that corrective actions have been closed out is in place.

AUDITORS

6.1.22 ASMI RFM Team requires Certification Body auditors to have successfully completed training in the RFM Program.

6.1.23 ASMI RFM Team requires that Certification Bodies include the following, where applicable, in their competence assessment of auditors:

- a) An assessment of knowledge and skills for each fundamental area the auditor will be expected to be working;
- b) An assessment of knowledge of pertinent fishery and the ability to access and be able to apply relevant laws and regulations;
- c) An assessment of knowledge of pertinent supply chain traceability and verification systems
- d) An assessment of the personal attributes of the auditor, to ensure they conduct themselves in a professional manner;
- e) A period of supervised training to cover the assessment fishery and specific audit techniques and specific category knowledge; and
- f) A documented sign off of the satisfactory completion of the training program by the appointed competent supervisor.

6.1.24 ASMI RFM Team requires that a Certification Body's lead auditors participate annually in at least one audit against the Program standard to maintain category and Program knowledge.

6.1.25 ASMI RFM Team requires that Certification Bodies have a continuing professional development program in place that provides auditors with current best practice for fishery management.

CHAIN OF CUSTODY

6.1.26 The Alaska RFM Program requires that all certified products are identified and segregated from non-certified products at all stages of the supply chain.

6.1.27 ASMI requires all certified enterprises that are physically handling the certified product to undergo a Chain of Custody audit by an accredited Certification Body if the product can be destined for retail sale as a certified, labelled product. No audit is required for storage and distribution of tamper-proof, packaged products.

6.1.28 ASMI requires Certification Bodies to verify that all enterprises in the chain maintain accurate and accessible records that allow any certified product or batch of products to be traceable from point of sale to the buyer.

6.1.29 ASMI requires that enterprises are able to demonstrate that these Chain of Custody requirements are met by the enterprise's subcontractors.

6.1.30 ASMI requires Certification Bodies to have documented procedures for auditing methods and frequency of audits that meet the following requirements:

- a) Certificate validity does not exceed three years;
- b) Periodicity depends on risk factors; and
- c) Changes to an enterprise's traceability system that are deemed to affect the integrity of the Chain of Custody result in an onsite re-audit.

6.1.31 The ASMI RFM Team requires the Certification Bodies to record all identified breaches of the chain of custody, including:

- a) An explanation of the factors that allowed the breach to occur;
- b) An explanation of the corrective actions required to ensure that a similar breach does not re-occur;
- c) The time frames for the corrective actions to be completed; and
- d) The date of closing out of the corrective actions and how the problem was solved.

6.1.32 ASMI RFM Team requires that a Certification Body's audit reports include:

- a) The date of the inspection/audit;
- b) The name(s) of the person(s) responsible for the audit and report;
- c) The names and addresses of the sites inspected/audited;
- d) The scope of the inspection/audit;
- e) The non-conformities identified;
- f) The result of at least one mass balance assessment for each product covered by the CoC audit; and
- g) A conclusion on the conformity of the client with the chain of custody requirements.

6.1.33 ASMI RFM Team requires the Certification Bodies to file reports at their offices and to make these reports available to interested stakeholders upon request.

6.1.34 ASMI RFM Team requires that an enterprise keeps records that demonstrate conformity with the Chain of Custody requirements for a period that:

- a) Exceeds the shelf life of the certified product; and
- b) Exceeds the period between audits.

6.1.35 For Chain of Custody certification of multiple sites managed under the control of a single entity, the ASMI RFM Team defines specific audit procedures that ensure all sites comply with the Chain of Custody certification requirements. Control can include direct ownership, franchises, or where the entity has a signed agreement or contract with each site.

6.1.36 The ASMI RFM Team requires assessment of all sites for multi-site certification as part of the single entity internal audit program, during the period of validity of the certificate.

6.2 Certification Bodies

6.2.1 Certification Bodies are approved after formal application to the ASMI Sustainability Director. The Program is open to new Certification Bodies. Their role is to assess applicants and examine reports on assessments, identifying any significant failure on the part of the Client to observe the Rules Governing Certification and decide on the issue, maintenance or withdrawal of Certificates of Approval for the relevant RFM Standard.

6.2.2 Certification Bodies shall be approved by ASMI on the basis of experience in the categories of:

- a) Practical (Working) Knowledge;
- b) Standards Knowledge;
- c) Auditing Knowledge; and
- d) ISO 17065 accreditation.

6.3.2 The service provided by each Certification Body employed is subject to an agreement that sets out the arrangements for the provision of the service and includes requirements for the information and data arising from the provision of the service to be retained in confidence. The ASMI RFM Team maintains a copy of the agreement with each Certification Body, and these are available for examination, upon request by authorized persons.

6.4 The Certification System

6.4.1 To qualify for approval, each Certification Body must be accredited to ISO 17065 or be in application for accreditation to ISO 17065 and agree to conform to RFM Procedures and Regulations.

6.4.2 The Certification Body must be capable of complying with RFM Program Regulations, which clearly set out:

- a) The procedure for progressing applications to certification decision;
- b) The assessment procedure and frequency of assessments;
- c) The certification procedures; and
- d) The Rules Governing Certification.

6.4.3 Both the Procedures and Program Standards will be subject to Documentation and Amendment Control and will be issued as appropriate, to applicants, clients, and relevant Certification Bodies and to members of committees.

6.5 Certification Program

6.5.1 The technical criteria, which the participants in the RFM Program must meet and maintain, are presented in the RFM Program Standards (Conformance Criteria for Responsible Fishery Management and Chain of Custody). These are controlled documents and are published on the ASMI website.

6.5.2 Participation in the RFM Program is open to all applicants who have demonstrated, by means of assessment, that they have the ability and resources to comply with the criteria for the relevant RFM Standard.

6.6 Operating Procedures Summary

6.6.1 Certification Body Pre-assessment Check on Applicant The purpose of a pre-assessment check is to determine by telephone discussion, correspondence or meeting whether the applicant has the capability and resources to operate in conformity with the criteria defined in the relevant RFM Program Standard, or to identify any shortcomings that may have to be

6.6.1 (continued) corrected before the application can be progressed and, where appropriate, to provide sufficient details for a quote to be given for assessment and certification.

The Program provides for this opening discussion or correspondence during which the assessment procedure is explained, any queries about the criteria defined in the Standards are answered, and arrangements are made for the appropriate staff to be available during assessment.

The responsible Certification Bodies staff member will maintain a report on the initial contact. For initial fishery applicants there will be a more detailed Application Validation Phase.

Where the pre-assessment check is carried out, in cases where it is clear that the Applicant should be able to comply with the criteria defined in the Standards, the Certification Body may proceed to carry out a full assessment as detailed below.

6.6.2 Certification Body Assessments (Overview)

The assessment program provides for the following:

- a) A scientific assessment of the operational management of the fishery;
- b) A detailed assessment of the traceability capability, product handling, identification, identity preservation and segregation (where necessary) and control of use of the RFM Seal on certified fishery products entering the supply chain; and
- c) An examination of relevant records and the system for maintaining them.

Details of the full procedure for both fishery and chain of custody assessments can be found in the procedures section.

The Certification Body will identify any observed non-compliance with the criteria defined in the relevant Program Standards and record the non-compliance on a report form.

On completion of the assessment, the Certification Bodies will present their findings, discuss any non-compliance and indicate timescales for submission of a corrective action program.

The Certification Bodies will complete a report on the assessment. For initial Fishery Assessments this report will undergo a peer review and a public review. The Certification Body's Program Administrator will submit any final report for consideration by the appropriate Certification Committee.

If the application is approved by the Certification Body Certification Committee:

- a) The applicant will be informed in writing;
- b) The applicant's details and certified products will be entered in the relevant Certification Body Register of Clients and a Certification Body Certificate of Approval will be issued;
- c) Any Certification Body fishery assessment report will be made publicly available. All Chain of Custody reports and all the relevant correspondences will be filed for future reference.

If a Certification Body's certification is withheld:

- a) The reasons will be communicated to the applicant, in writing, which will identify areas of non-compliance and requesting a corrective action.
- b) Corrective actions will be verified before the application can be given further consideration; and
- c) The Certification Body's assessment report and all the relevant correspondences will be filed for future reference.

Should the applicant wish to appeal against the withholding of a Certificate of Approval, the appeal will be heard in the manner described in the Appeals section of the CCC Terms of Reference.

6.6.3 Certificate of Approval

A Certification Body Certificate of Approval granted to a client is valid from the date of issue, subject to satisfactory performance. This will be assessed at a frequency determined by the Fishery Management and Chain of Custody Standard requirements.

The Certification Body Certificate will state as a minimum:

- a) The Certificate number applicable to the production establishment;
- b) The name of the key organization and any associated organizations;
- c) Certification Standard details; and
- d) The date of issue of the Certificate.

6.6.4 Continuing Assessments (Surveillance)

It is a condition of granting a Certificate of Approval that continuing assessments shall be carried out to ensure that the criteria defined in the relevant RFM Standard are being met and maintained.

The program for continuing assessments provides for:

- a) In the case of COC audits, an assessment of the traceability capability, product handling, identification, identity preservation and segregation (where necessary) as prescribed within the relevant Program Standard.
- b) In all cases an examination of relevant records and the system for maintaining them.

During the course of a continuing assessment the Certification Bodies will check that corrective actions have been taken on all non-compliance reports. The Certification will also identify any other observed non-compliance and record them on a report form. The Certification Bodies will sign this form and obtain the signature of the applicants or their representative. If the client has requested an extension of scope of certification, the Certification Bodies will include an assessment of the new scope within the assessment visit.

On completion of the assessment, Certification Bodies will discuss their findings with the clients or their representative and agree upon each non-compliance.

The assessor will complete a report on the assessment. A copy of the report will be forwarded to the Certification Bodies and clients. The Assessment report will be reviewed, following which:

- a) The applicant will be notified in writing of the outcome of the review with reference made to any matters requiring corrective action; and
- b) Together with all relevant correspondence will be filed for reference.

The procedure for the review of assessment reports are detailed in the Procedures section of this manual. The titles are:

- a) Application to Certification for RFM Fishery Management Standard
- b) Application to Certification for RFM Chain of Custody

6.6.5 RFM Certified Seal Management

Clients and associated organizations listed on valid RFM Certificate of Approval may be authorized to use a RFM Certified Seal by the ASMI RFM Team following the signing of a 'Certified Seal Agreement'. The Seal is Certified Mark of Conformity and its use is regulated through the Chain of Custody and Seal Management Procedures. Below is a copy of the RFM Certified Seal.



The RFM Certified Seal should not be confused with the Alaska Seafood Logo. The Alaska Seafood logo is not part of the RFM program. Below is a copy of the Alaska Seafood Logo for reference.



The RFM Certified Seal may be used only in the form approved by the ASMI RFM Team and only in relation to products that are subject to the Certificate of Approval issued to the Client and organizations concerned. The RFM Certified Seal must be used only in association with the business names shown on the Certificate of Approval or the brand mark of the business.

6.6.6 Sanctions for misuse

Incorrect use of the approved RFM Certified Seal or misleading references to certificates found in advertisement, catalogues, etc., shall require immediate withdrawal of the offending material. Where no such corrective action is implemented, ASMI may initiate appropriate legal action.

6.7 Rules Governing Certification

6.7.1 These Rules apply to all Certification Bodies.

6.7.2 For the purpose of these rules, the definitions of the terms used are set out in the manual.

6.7.3 The Certification Body is the sole authority by which Certificates of Approval may be granted or withdrawn. The Certification Body operates under the administration and development of the Certification System, the approved Certification Program included within the System and under these rules.

6.7.4 Applicants who satisfy the Certification Bodies that they are capable of compliance with the requirements of a particular RFM Standard and who give such undertakings as may be required shall:

- a) Be subject to complying with these rules as amended from time to time and such undertakings;
- b) Be entitled to a Certificate of Approval, which shall nevertheless remain the property of the Certification Bodies.

6.7.5 Certificates are valid from the date of issue, subject to the terms of these Rules as amended from time to time.

6.7.6 Clients shall:

- a) At all times comply with these rules as amended from time to time.
- b) Comply with the requirements of the RFM Certification Program. Failure to comply with any of the specified requirements of the RFM Program Standards will be the cause of withdrawal of the Certificate of Approval.
- c) Give representatives of Certification Bodies access during normal working hours to production establishments in which production or storage of products, subject to the Certificate of Approval, is being carried out for the purpose of examination of products, and the application of rules of production, the production environment, the production processes, product handling and storage, transportation of the product, staff training, the control of product, records and details of internal audits, or establishing that the procedures following the withdrawal of the Certificate of Approval as described herein have been carried out as necessary;
- d) Give representatives of Certification Bodies access during normal working hours to establishments whose management systems, which are subject to the Certificate of Approval, for the purpose of examination of the said management system procedures to establish they are in conformity with the Program Standard;
- e) Nominate a management representative and one or more deputies authorized to act in the main nominee's absence (and replacement nominees as may be necessary) that shall be responsible for all matters in connection with the requirements of the Certificate of Approval;
- f) Correct any deficiencies identified during continuing assessments;
- g) Use a RFM Certified Seal only in respect of the Certificate of Approval, produced by the participating company within the client group on the Certificate, and strictly in accordance with the conditions for its use;
- h) Discontinue any use of a RFM Certified Seal which is outside the scope of the conditions for its use, or which is unacceptable to the Certification Bodies and any form of statement with reference to the authority of the producer to claim compliance with a Certification Program, and which in the opinion of the ASMI RFM Team might be misleading;
- i) Upon withdrawal of the Certificate of Approval (however determined), forthwith discontinue use of any RFM Certified Seal which a license has been issued and all advertising matter that contains any reference thereto. In addition, any other documents in the possession of the Producer which bear reference to the Certificate of Approval shall be so treated, if the Certification Body requires; and
- j) Not conduct operations in a manner that may affect the confidence of buyers and consumers in the reliability of RFM Certification Program or bring themselves or the RFM Program into disrepute.

6.7.7 Having regard for RFM administrative costs, clients and applicants shall pay as part of formal contract agreements:

- a) The relevant annual fee for assessment and certification;
- b) The cost of any additional assessment deemed to be necessary by the Certification Bodies;
- c) The cost of any additional sampling or testing deemed to be necessary by the Certification Bodies; and
- d) Any additional costs incurred by the Certification Bodies due to non-compliance with these rules.

6.7.8 The approved Certification Bodies shall:

- a) Undertake continuing assessments periodically at the establishments of clients for the purpose of verifying that the obligations defined by the Certificate of Approval are being observed;
- b) Notify clients of any changes to the Standard and give them such time as is reasonable, in the opinion of the Standards Committees, to allow adjustment of their processes and relevant procedures to meet the revised requirements;
- c) Not disclose any information concerning a client obtained during the course of its assessment and certification activities other than that which is in the public domain, unless otherwise required to do so by the law, or requested and permitted to do so by the client; and
- d) Notify clients of any complaints received relating to products or management systems that apply to the Certificate of Approval.

6.7.9 If a client is temporarily unable to comply with the requirements of these rules, as amended from time to time, the Certification Body may require the client to discontinue any claim of compliance with the relevant RFM Program Standard and use of the RFM Certified Seal, with immediate effect until it is satisfied that compliance is again achieved. The Certification Bodies must immediately inform the ASMI Sustainability Director.

6.7.10 If a client fails to comply with these Rules, as amended from time to time, the Certification Body on behalf of the ASMI may:

- a) Withdraw the Certificate of Approval or reduce its scope; or
- b) Refuse to grant a Certificate of Approval or extend its scope.

Such decisions, and the grounds for them, shall be communicated to the Client and ASMI Sustainability Director in writing.

6.7.11 The Certification Bodies may consider withdrawing or refusing to grant a Certificate of Approval if a Client's business is likely to be disbanded.

COMPLAINTS AND APPEALS

6.7.12 If a client, applicant or external party wishes to complain against any decision of a Certification Body under these Rules, the client or applicant or other party shall, within 14 days of being officially informed of the decision, give notice to the relevant Certification Body and the ASMI Sustainability Director (in writing) of their wish to appeal the decision and give the grounds for doing so.

The Certification Body will instigate its own Complaints Review Process and inform the Complainant and ASMI. If the Complainant is still not satisfied with the outcome they have the right to raise the issue with the CCC Appeals Panel.

The ASMI Sustainability Director will refer the matter to the Chairman of the Conformance Criteria Committee who shall appoint an Appeals Panel to hear the appeal. The Panel shall comprise of three members, none of whom shall have any commercial interest in the subject of appeal. A meeting (or teleconference) of the Panel shall be held within 30 days of the receipt of the notice of appeal. The Sustainability Director will assist with the facilitation of information.

The Appellant, the Certification Body, and their associated Accreditation Board will be informed in writing of the Appeals Panel decision. The Certification Body will be required to review its certification

decision if the Appeals Panel finds in favor of the Appellant and submit its findings to its Accreditation Board and to ASMI.

6.7.13 These rules may, from time to time, be altered by ASMI. No alterations shall affect the right of Clients to claim compliance with the RFM Certification Program, use an associated RFM Certified Seal, or issue a Statement of Conformity unless the ASMI Sustainability Director has given them notice in writing of such alterations. A date by which the altered rules come into force shall be issued by ASMI and shall not be less than six months from the date of notification of the alteration.

6.7.14 Each Certification Body shall keep a register of Certified Clients and it shall be available upon request. ASMI will maintain a published master list.

6.8 Certification Administrative Procedures (Overview)

Further details for the operation of each of the procedures listed in this section are contained in the relevant RFM Procedures.

ISSUE AND MAINTENANCE OF A CERTIFICATE OF APPROVAL

6.8.1 A designated Certification Body Technical staff member must scrutinize all reports arising from initial or continuing assessment visits.

6.8.2 The reports, or a summary produced by the Certification Body Assessors, are considered by the relevant Certification Body Certification Committees.

6.8.3 Each applicant or client will be notified in writing of the results of the Certification Body Committee's findings including any non-compliance, which will require to be addressed prior to issue or to ensure maintenance of a Certificate of Approval.

6.8.4 Appeals against a decision to withhold the issue or to withdraw a Certificate of Approval will be heard in the manner described in 6.7.12.

6.9 Withdrawal of a Certificate of Approval

6.9.1 In cases where the client concerned has, within the period of time defined, provided satisfactory evidence that the required corrective action has been implemented, no further action will be taken.

In cases where the client has, within the period of time defined, failed to implement the required corrective action, the Certificate of Approval will be withdrawn. The Client will be notified in writing and required to return or destroy the Certificate.

6.9.2 Appeals against a decision to withdraw a Certificate of Approval will be heard in the manner described.

6.10 Complaints about Certified Products or Program Operation

Complaints about the RFM Program will be categorized and managed according to Type:

6.10.1 Type 1) Complaints about Products with a Certified RFM Seal

Complaints about the general integrity of products packaged by seafood businesses with a RFM Certified Seal will be dealt with by the relevant businesses.

The responsibility for complying with the requirements of a Certification Program, as defined in the Standards for the RFM Program, and for complying with statutory requirements, rests absolutely with Chain of Custody (CoC) Clients. Therefore, any complaint about a product or possible infringements of the law shall be dealt with by the CoC Client. Complaints of this nature, coming directly to the Certification Body or ASMI, will be referred to the CoC client concerned for appropriate action to be taken.

Complaints of this nature are not logged by ASMI or the Certification Body.

6.10.2 Type 2) Complaints about misuse of the RFM Certified Seal

Complaints concerning the misuse of the RFM Certified Seal will be managed by the Sustainability Director. Details of the complaint and products will be recorded including the product, the species, the associated organization, the region. The ASMI RFM Team will complete a trace-back to the relevant organization and certification body and direct the certification body to conduct an investigation and report on the extent of the issue. A breach in the terms of the use of the RFM Certified Seal may lead to a product recall. The ASMI RFM Team will inform the ASMI Sustainability Director when the complaint has been closed out and the corrective actions that arise as a result of the complaint.

6.10.3 Type 3) Complaints about Certification Program Operations and Certification Body Decisions

Complaints concerning the operation of the RFM Program and/or Certification Body decisions will be facilitated by the ASMI Sustainability Director, who will be responsible for acknowledgement and investigation of the complaint. The ASMI Sustainability Director will also be responsible for seeking and managing resolution of the complaint.

RFM Complaint Records

Type 2 and Type 3 Complaints will be flagged to the ASMI Sustainability Director and the Executive Director and these managers will be kept informed of any corrective actions until the complaint has been resolved

A complaints register will be maintained and will be made available for internal and third party system audits.

6.11 Maintenance of Records

6.11.1 Records shall be maintained by the Certification Bodies as defined within their documented Quality Systems to demonstrate compliance with the system and appropriate regulatory requirements. The records include reports arising from assessments.

6.11.2 The Certification Body records shall be readily accessible and safely stored for a period of five years unless otherwise specified.

6.11.3 The information contained in the Certification Body records, other than that which is in the public domain, will be held in confidence unless otherwise required by the law, or requested/permited to do so by the Client.

6.12 Control of Documentation

6.12.1 Issue and Control of Documents

The following documents are maintained and issued on a controlled basis through the ASMI website:

- a) The Quality Management System (QMS) for the RFM Program.
- b) Standards for the RFM Certification Program.

6.12.2 Amendment Control

Amendments to previously issued controlled documents will be reviewed and approved by the authorized signatory for that document before issue.

6.12.3 Master Lists of Clients and Certified Products

ASMI will maintain a master list of certified clients and this will be available on their website. Certification Bodies will maintain a list of their own clients and ensure that ASMI is informed of changes and additions of new clients.

6.13 Internal Review

6.13.1 The operation of the RFM Program's activities and performance will be subject to annual and planned formal review to ensure continued compliance with the procedures defined within this Control Manual.

An internal review program will be maintained ensuring all aspects of the documented systems are reviewed at least annually. The review will assess the implementation and adequacy of the systems defined in the RFM QMS, Control Manual, Procedures and the Standards.

The ASMI RFM Team will conduct the review and record any non-compliances with documented procedures, recommend corrective actions, and where appropriate, make recommendations for systems improvements. Follow-up reviews will be conducted where necessary to verify corrective actions.

6.13.2 On-going review of Certification Body assessment performance is achieved by a combination of monitoring of assessment reports, continuous contact with assessment staff, and witness of assessments conducted by individual assessors and assessments of head office to ensure compliance with assessment procedures and consistency of interpretation of Program requirements.

6.14 Management Review

The ASMI RFM Team or contracted expert will make a report on the findings of the internal review at least annually to the Sustainability Director.

7. ACCREDITATION MANAGEMENT

7.1 Accreditation Bodies

7.1.1 Accreditation Bodies (ABs) are chosen by the Certification Bodies (CBs) and must be members of the International Accreditation Forum.

7.1.2 ASMI will endeavor to have a contractual or enforceable arrangement with AB that offer accreditation to their Program. The arrangement requires the ABs to be compliant with the requirements of ISO/IEC 17011:2004.

7.1.3 ASMI does not restrict choice of ABs and ensures that accreditation services are available to CBs irrespective of their country of residence, size and of the existing number of already ABs, within the scope of the Program.

7.1.4 ASMI specifies the requirements for CBs that the AB is required to verify.

7.1.5 Subsequent to any changes in the certification and procedures requirements, ASMI ensures CBs are given a defined time period to conform to the changes. The time period is relative to the significance of the change.

7.1.6 ASMI requires (through the engagement of IAF AB's) that the AB employs personnel that have the necessary education, training, technical knowledge, and experience for performing accreditation functions in fisheries and supply chain operations. This includes knowledge of the RFM standards and their intent.

7.1.7 ASMI requires (through the engagement of IAF AB's) that external audits be carried out on the AB to assess performance.

7.1.8 ASMI requires (through the engagement of IAF AB's) that the AB makes information available on request about its organizational structure and the financial and other kinds of support it receives from public or private entities.

7.1.9 ASMI (through the engagement of IAF AB's) ensures that the accreditation process includes an office audit of the certification body.

7.1.10 ASMI ensures (through the engagement of IAF AB's) that the accreditation process includes a review of the performance of CBs and auditors in the field by witness assessments.

7.1.11 ASMI requires (through the engagement of IAF AB's) that CBs operating in the Program be accredited to ISO/IEC 17065:2012 for the scope of the respective standard of the Program.