



*Wild, Natural & Sustainable®*

Alaska Seafood Marketing Institute  
Responsible Fisheries Management (RFM) Committee Meeting  
October 23, 2016 at 11:00 am at the APICDA Office  
717 K Street, Anchorage, AK 99501  
DRAFT MINUTES

Committee Members Present

Larry Cotter  
Dave Benton  
Glenn Reed  
Stefanie Moreland  
Jim Gilmore  
Ron Rogness  
Tomi Marsh

Absent: Duncan Fields

Others

Susan Marks / ASMI Sustainability Director  
Jeff Regnart / RFM Consultant  
Peter Marshall / RFM Consultant  
Mike Platt / RFM Consultant  
Michael Kohan / ASMI Technical Director  
Merle Knapp- Glacier Fish  
Julie Decker / AFDF

**Opening Items**

- a. Meeting was called to order at 11 am
- b. Cotter amended the agenda to move executive session to after new business
- c. Agenda approved
- d. Minutes from September 12 meeting

**A motion was made by Reed to approve the draft minutes from the September 12, 2016 meeting as written; seconded by Benton; the motion passed unanimously.**

- e. Cotter informed everyone that Jason and Mark have resigned from the RFM Committee.

**Public Comment** / no public comment

## Old Business

### a. Review of RFM projects over last quarter

Marks gave an update on the focus for the last quarter which included finalizing V 2.0 of the fisheries standard, completing the review of the public comments and preparing them to be posted on website.

Cotter asked about many public comments. Marks said comments were received by WWF & Monterey Bay Aquarium- a little over 100 comments that the FSC reviewed and responded to.

Question if there was any common themes. Regnart explained approach, wording, separate guidance structure, most did not result in changes to actual standard. Comments seemed positive and helped strengthen the standard. He explained that it helped that the FSC meeting was in Monterey as it gave the opportunity for the FSC to interact with the people who submitted the comments.

Regnart also explained that the field trip we co-hosted with PSPA to the hatcheries in Prince William Sound helped as there were attendees from Monterey Bay.

Susan distributed a media release that hit the press today from HighLiner stating their support for RFM and GSSI and that they would add RFM to their procurement policy.

### b. Strategic Plan

It was agreed that the Strategic Plan does need to be reviewed and updated and this discussion would be moved forward to a later date.

Moreland asked about the industry outreach and tool kit and Marks referred people to their packets where the RFM FAQs, Quick Reference Cheat Sheet & GSSI Fact Sheet were included. She said there is also the new RFM 101 Brochure. She said she feels there is a comprehensive amount of materials for RFM, but if people think there needs to be something additional, she would like to know.

Cotter suggested putting the GSSI and FAQ sheet on the web.

### c. QMS Procedure 9 – Appeals & Complaints Process

Marks explained there are currently three types of complaints- type 3 complaints are what committee members indicated they had concerns with at last year's All Hand's meeting.

Moreland feels committee needs to review procedure 9 in light of the new process for stakeholder registration and 30 day public consultation on new fisheries and full re-certifications.

There was a discussion about the stakeholder registration and the 30 day public comment on new fisheries and full re-cert assessment reports. Marks explained that there is no 30 day window to register; rather, once the Certification Body (CB) sends out notice of the Assessment team, there will be a call for stakeholders to register.

Moreland asked if someone could submit an appeal if they have never registered? Marks and Marshall explained that ultimately the CB must take on board any comments that are relevant to the assessment, but ideally a stakeholder should have been active in the public comment process in order to register a formal complaint.

Marks explained that accreditation would be difficult to deal with if a complaint or comment were ignored. If it is a legitimate comment, it needs to be heard and responded to.

Marks explained that when a fishery goes through recertification, ASMI will do an e-blast to explain that all interested stakeholders must register at the CB's website – There will be no '30 day registration period'. All registered stakeholders will be sent a copy of the draft report.

Marks also confirmed that complaints are registered and sent to the CB directly, and they have their own internal process. If it cannot be resolved, it would come back to the RFM program and Procedure 9 would be applicable.

Marks asked Gilmore how MSC process works. Gilmore said this is not how it works with MSC. He said he would be concerned if a complaint was made by someone who had not registered or provided any comments during the 30 day public comment period. He feels the program and CB need to have some point where they cut off new information. Gilmore recommend that complaints only be open to registered stakeholders.

Marshall said it is highly unlikely that there would be new information submitted as part of a complaint. But, the CB would have a difficult time ignoring new information and getting that by their accreditation board. Recommended the best way to deal with it is write the policy to state that complaints can only be considered by registered stakeholders, but recognize that there may be a stakeholder or interested member that won't register, and may come in with late information.

Moreland said this leaves a lot of room between the two sides- not wanting to write a blank check on the 9th hour.

Marshall talked about ISO 17065 lack of specificity, so the interpretation is left to the accreditation boards and that can vary from EU or US based. We know that the EU has demonstrated they are very strict. We know less about ANSI in the US. To date our communication with INAB accreditation board has solely been through Global Trust; however, we are trying to change this so we can have a direct line of communication.

Rogness said it is hard to find justification in ISO 17065 for something as specific as this topic, and Marshall agreed with this statement.

Gilmore asked since we know DNV is working with the US accreditation board ANSI, could we look for harmonization between INAB and ANSI?

Marshall said we are trying to achieve accreditation boards coming together so that there is a mutual understanding. ANSI is more open-minded. We are in a difficult position, because these accreditation boards are not easily influenced and are risk adverse. The goal is to be able to talk directly to accreditation boards, but we have been slow in achieving this.

Reed said the component that seems to be missing is having to start over with new information- you want to consider new information, but not be at a whim of a grenade that comes in at the last minute. We need to have a caveat, during the next review, next audit we can discuss this. We need to have a structure.

Cotter said Gilmore, Moreland and Reed are obvious committee members to work on this.

Benton asked the rationale for having an open-ended process? We need to have a clear explanation.

## CB and Fishery Client Updates

There was a discussion of DNV as the new CB for RFM. Marks said the first fishery they will assess is pollock for full recertification. Before they can start this work they have to extend their ISO 17065 scope accreditation. They have told us they are using ANSI as their accreditation board and they have submitted their application for scope extensions.

Cotter said this is good to hear. Do they have interest in more than pollock? Marks confirmed they were awarded the RFP for cod and flatfish and they will conduct these surveillance audits in 2017.

Cotter asked if RFM and MSC certifications for these 3 fisheries are aligned. Gilmore explained they are not quite as far along as we want to be. Getting the 3 client groups together within RFM like MSC is the first step. Need alignment and it will probably be several years.

Julie Decker with AFDF spoke. They are the client for cod and salmon. She explained they initially tried to do an RFP for cod and salmon, but determined it would not work and they joined the RFP for cod, Pollock and flatfish. Cod needed to complete a surveillance audit so they hired GT. She wants to have alignment for the future. She said certification costs are coming down with competitive RFP process between 2 CBs.

Marks added that there was no on-site surveillance audit for cod and this was a direct result of changes the RFM Team made to the QMS Procedure that directed CBs to do a “summary review”, which at times can negate the need for an on-site. This resulted in direct cost savings.

### d. Fishery Clients

Regnart thanked the committee – specifically Gilmore for their assistance in adding an addendum to Procedure 2.

Marks reminded the committee that the first draft assessment reports will be posted for 30 day public comment. Sablefish is up first halibut is next and then salmon.

There was a question about how many registered stakeholders there have been. Marks said this is managed by GT and she wasn't sure, but thought less than 10.

## New Business

### a. Version 2 Review

Regnart talked about the Fisheries Standard V 2.0 implementation timeline. Go live January 1, which will be followed by the official notification to CBs & training. This will also have to go through full accreditation.

There was a discussion about GSSI impact. Marks explained we will need to take Section D of the GSSI application and indicate what has changed from Version 1.3. Then the Independent Experts will look to see the differences between 1.3 and 2.0. It will be labor intensive, need to go through 60 areas and map the differences.

Regnart said salmon was the only fishery using 1.3, and this was an area of focus for our GSSI recognition. We are required to keep GSSI updated on the implementation of 1.3 (as it relates to the salmon assessment) and we are constantly providing updates on the timeline.

Moreland asked why GSSI is involved with salmon? Regnart explained because salmon is being assessed against V 1.3, but GSSI isn't evaluating anything to do with the actual assessment; rather, they just need verification the standard is being used and there is evidence of having a fishery measured against the standard.

Benton asked how does this intersect with 2.0? Marks explained our recognition will continue to be applicable to V 1.3 and will be until a fishery goes against 2.0 (Pollock will likely be the first). The RFM team does not have any concerns over the transition. When we bring version 2.0 to implementation then we go to GSSI.

Cotter brought up the committee's review of Version 2.0 and that they felt they didn't have adequate time to comment on this and the QMS.

Regnart said the team was under a confined time period, driven by the desire to get these documents to the Board during the All Hands Board Meeting. He said based on this there was limited time and we understand the committee would like more time and we can improve this for next time.

Marks reminded the committee that the standard has been out there available to look when it was posted for 60 days and open for comment. She added that the RFM Team was receptive at any time to answer questions and hear comments.

Moreland said procedurally if the RFM committee could have a role in comments, there needs to be a procedure for RFM to have a way to comment.

Cotter talked about the committee's role and their need to review documents as the final stop before the board. The committee needs to comment to the board on RFM.

Regnart talked about the need for separation of powers. The FSC was formed, which creates a transparency for the standard that is separate from of the RFM committee. If the RFM Committee wants to comment there needs to be a feedback loop with this back to the FSC after the committee reviews.

Benton agreed with this statement and Cotter asked what the process needs to be?

Marks stated the primary reason Jeff is on the team is his expertise in fisheries in Alaska. He is looking at the standard with that lens.

Reed said they recognize Jeff's expertise. But, thinks the question is 'what is the relevancy of the committee'?

Cotter stated that the FSC needs to be an independent entity.

Moreland agrees with that. The role of the committee would be that the board would look to the RFM committee and we would have a review.

Benton confirmed - FSC → RFM → FSC correct? Yes. Also, stated he is comfortable with the expertise Jeff brings.

Marshall noted that it was agreed at last year's committee meeting in terms of the QMS the committee does not have a sign off. Would need to go back to the QMS Procedure 8 (document control) and revise.

Marks said we can modify Procedure 8 to allow for a formal window for the RFM Committee to review documents and we can take it off the agenda for the board to review 2.0 until the committee feels comfortable.

Cotter confirmed the 2.0 scenario.... Committee reviews 2.0 and if there are areas of concern or suggestions this goes back to FSC, and FSC says 1) thanks, those are great, we will adopt and forward onto ASMI board noted with RFM comments or 2) you are wrong, we are moving onto the board, not adopting comments from RFM committee.

Cotter asked if there should be an RFM member present at FSC meetings like we did before when Moreland joined the FSC meeting in Portland, Maine. Regnart thinks this would be valuable and Marks agreed.

#### b. Internal Program Review

Marks referred to the summary document in the packets and explained this review is based on a GSSI essential component. It is an internal document that will go to ASMI ED, committee and ASMI Board. It identifies areas that are working well and what areas we need to improve. The report has been started but not completed yet. Once it is done it will be circulated to the committee for comments/questions.

Moreland asked what the last year's objectives were. Marks referred people to the Sustainability Program report. She noted 7 in total and that the Program met all of these milestones.

Moreland asked if the review will look at the QMS, and noted if there are specific barriers to new CBs.

Marks stated the focus of the review is the sections described and that it relates mostly to GSSI requirements.

Marshall said technically, there are no barriers to CBs entering the program and the primary barrier is that it won't make a good business case.

Moreland noted 2 requirements in the QMS under CB requirements. One was a period of supervisor training and that lead auditors participate annually to maintain knowledge- is it reasonable that a lead auditor will be able to check that box?

Marshall noted part of the internal review is to conduct a review of the CBs. We have carried this out and this issue didn't come up for them. CBs are not raising any concerns.

He also noted this section of the QMS is based specifically on a GSSI essential requirement and this language cannot be removed or we would be out of compliance with GSSI.

Cotter noted the program only has two CBs and thinks Moreland's point has merit. Could it be a problem tomorrow and then we only have 1 CB? We should look at it from a more broad view for the future.

Marshall noted the program has three CBs, two for Fisheries audits and two for CoC. GT does both. SCS is the 2<sup>nd</sup> for CoC. In the past we have talked with other CBs and they noted the business case as their reasons for not participating.

Marks noted the RFM team is not against making changes to the QMS. We would take changes to the QMS on board if you feel like this would work better.

Cotter suggested the committee see a draft of the internal review before sign off.

Marks asked about key objectives for the next year. Referred the committee to the Sustainability Program Report to review what has already been listed.

Moreland suggested adding 'Review for cost efficiencies'.

Cotter said outreach and awareness needs a stronger goal. Suggested adding the need for Alaska industry buy-in. We want industry to be fully supportive of RFM.

Moreland suggested an objective 'A focus of outreach and communication with Alaska fishery stakeholders.'

Benton suggested adding review and update the strategic plan (outdated) into the objectives in the next year.

c. Data Deficient Fishery framework (DDF)

Regnart provided update on the DDF – it's purpose, the workshop that was held in September, and that Golden King Crab will be the first fishery to utilize the framework.

Cotter noted processors were not invited and thinks this was a mistake. No survey data, except recently. We (processors) are willing to do surveys in the future.

Regnart said they have agreed to throw their hat into the Bering Sea Crab group and so we will work with them for RFM. Explained that DDF is not a lower grade certificate, it is a certificate to look at those 3 key clauses.

Moreland stated interest in this fishery being certified. What is the timeline on achieving? Regnart thinks by spring- I don't see a reason why they wouldn't be certified.

Rogness asked if RFM has sought any NGO feedback on DDF? Regnart said they understand why we need an approach that is different than the standard and doesn't think they have an issue with it. Needs a really low expectation- small footprint- quiets the NGO world.

e. CoC- Mike Platt

Platt gave an update on 2 projects he has been working on to reduce the audit burden within the supply chain & help small, low risk operations.

## Remote Assessment:

Platt explained the purpose was to look at low risk operations – typically the first point in the supply chain that are doing minimal processing and selling direct to market. He explained he took some of the key criteria of 2.4 and developed a low-risk assessment and remote assessment standard checklist. This would be a standard that would sit on its own and would not be accredited.

He received input from SCS and GT, and worked in collaboration with Allison Corcoran from Trident (ASMI Technical Committee). He explained the outcomes will be presented to the ASMI Technical Committee during All Hands.

A committee discussion ensued with many questions and a concern about how this came up as a priority? Marks explained there has been an increase in calls from small processors/direct harvesters, CoC was not affordable or accessible to them. And, an onsite audit was not necessary due to their low risk.

Marks mentioned this has been discussed in previous committee meetings, and the Technical Committee gave the approval to look into this area and propose a solution.

Reed felt a solution might not be at the same scale- can we look at solving this problem with the existing standard?

Platt explained it is a separate module within the CoC standard and is a critical part of the supply chain.

Reed expressed concern about the volume of people and volume of product- 90/10 rule, 10% of the smallest clients take 90% of the time. Cotter asked if there is enough volume to make this economically viable to set it up and maintain it. Is this problem big enough?

Marks asked what the alternatives are. Tell this sector we have no solution for them?

Moreland noted this is small volume and we have a backlog on large volume items. It will require a tremendous amount of time from ASMI staff.

The committee asked for this to be tabled for now and to focus instead on the MSC/RFM Comparison for further CoC harmonization. Marks noted this will need to be the decision of the Technical committee as they have purview of CoC.

## RFM/CoC harmonization

Platt explained he and Corcoran have been comparing the MSC/RFM CoC Standards to determine synergies that can streamline the audit process for cost savings.

This can only work if a company is using the same CB for the MSC and RFM CoC audit.

Rogness asked if RFM is going to have a pre-audit checklist? Variability from CB to CB.

Platt said we don't have one right now, but a CB will use the clauses and that forms the checklist. Accreditation body will witness the CB giving the audit to try to reduce variability. Bottom line is we can develop a generic template that all CBs can sign up to use.

Moreland asked about a timeline? Platt noted he will take feedback to the Technical Committee and discuss.

**Reed made a motion to move in to executive session to discuss the Transition Plan; Moreland seconded the motion, the motion passed unanimously.**

## **Executive Session**

Benton made a motion to move back to regular session; Reed seconded the motion; the motion passed unanimously.

The following Motions were made:

**Benton made a motion that**

- **The ASMI Board adopts Option 1 as described in the RFM Committee report, including next steps. This includes developing a slate of members for the foundation interim Board of Directors. The ASMI Board will make a final determination for transfer of RFM to the new foundation at its spring meeting.**
- **The ASMI Board defer action on RFM V 2.0 and QMS 4.0 pending a decision on the transfer of RFM to the foundation**
- **Authorize the ASMI Executive Director to make minor administrative housekeeping changes to the RFM QMS.**
- **The ASMI Board continue to stand up the RFM Committee and update membership of the RFM Committee to reflect most recent client fishery representation and needs for expertise.**

**the motion was seconded by Moreland, the motion passed unanimously.**

**Benton made a motion to**

- **Reaffirm the position of RFM committee regarding the application of the RFM Seal on non-human fishery marine products.**

**the motion was seconded by Reed; the motion passed unanimously.**

**Motion** made to adjourn the meeting by Reed / seconded by Rogness.

Meeting adjourned at 5:35 pm