



2020 RFM Program Internal Annual Program Review Report December 2020

Review Window: Jan 2020 – Dec 2020

Management Review Team

- Jeff Regnart – Consultant
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- Mike Platt – Consultant

The comments and findings from the review are intended to be used to inform RFM Management and advisory committees, ASMI Executive Director and ASMI Board members on what areas of the Program are functioning well and what areas of opportunity there may be for Program and/or policy and procedural improvements.

Below are the GSSI Essential Components related to the requirement of an Annual Internal Program Review:

SCHEME INTEGRITY MONITORING PROGRAM A.1.11 INTERNAL REVIEW

GSSI ESSENTIAL COMPONENT

The Scheme Owner undertakes a fully documented annual management review of scheme performance, including its assurance program, and the performance of certification and accreditation bodies. The results of the review are used to revise its operating procedures and practices, where necessary.

System exists for an annual documented management review that covers scheme performance, assurance program, accreditation bodies and certification bodies as applicable. A documented system to use the results of the review to revise operating procedures and systems is available.

FAO REFERENCE

[61] Requires institutions involved in establishing and implementing a certification scheme should be transparent, credible and robust with good governance.

In 77 [99] and 120 [141] FAO requires internal reviews for both certification bodies and accreditation bodies in order to be considered credible and robust. Therefore, this is considered a specification of [61] to ensure credibility, robustness and good governance of a Scheme Owner. This Essential Component is in line with ISO 17067 6.4.5.

Key Sections of the RFM Internal Program Review:

I. Overall Program Headlines

The RFM transitioned to new ownership in 2020, as of July 1, the ownership of the RFM Program transitioned from ASMI to the Certified Seafood Collaborative (CSC). The CSC is the approving body for all standards, strategy, and policy related to the RFM Program. The CSC Foundation Board Members can be found in section VIII.

No of Fisheries Certified – 8

No of Chain of Custody Units Certified - 58

No of New Fisheries in Application – Atka Mackerel and Rockfish certified February 2020

The RFM intends to expand the program to fisheries in North America (US and Canadian EEZs), and continue work with fellow global RFM partners, including alignment of RFM and MSC CoC processes to allow for an equivalency audit.

2020 has been a challenging year for all certification programs due to the emergence of the Covid-19 pandemic in early-2020. As such, third-party certification programs have had to respond quickly to provide risk assessment, procedures and guidance on conducting audits remotely when country wide and local lockdowns have prevented site audits. In this regard, the RFM management drafted a letter of variance that was distributed to the CB's and AB's¹.

All Certification Bodies in the RFM Program have been audited remotely. Accreditation Bodies were engaged with in 2020 to communication and remote audit changes relative to the COVID Pandemic.

RFM Audits have moved to remote auditing due to the extraordinary circumstances and according to guidance given by the Program Management Team. Direction on policies were derived from GSSI and IAF guidance documents.

As of Jan 1 2020, the RFM committee was dissolved and the CSC board started to meet and eventually took over the ownership of the program on July 1, 2020. The press release is on the website.

Version 2.1 of the RFM standard was issued in September 2020 reflecting that the scope is changing from Alaska only fisheries to North American fisheries operating within the U.S. and Canadian 200 nm EEZ.

¹ See <https://uploads.seafood.org/2020/03/Letter-of-Variance-Coronavirus-CoC-and-Fishery-Audits.pdf>

Work has started in 2020 on reviewing the Data Deficient Framework (DDF), a revision of the DDF will be made in Q1 2021.

The RFM Program has received no external complaints during 2020.

II. Review of RFM Objectives set for 2020

The following RFM objectives were suggested in the 2019 Internal Review for the year 2020:

1. Verify that CBs are properly reviewed/audited

All CB office audits were undertaken remotely, with JR and PM attending on behalf of the RFM. A summary of these office audits is shown in section VII.

2. Maintenance of GSSI Benchmarking Approval and participate in the GSSI standard review

GSSI benchmarking status has been maintained. The GSSI V2 review identified two changes that might affect subsequent MOCAs; **A3.15** RFM would need to demonstrate that it implements a mechanism to ensure that disadvantaged and vulnerable stakeholders are able to participate. **D.5.11**, “The standard does not preclude small scale fisheries from possible certification for Ecolabelling due to the use of less elaborate methods of stock assessment”. The latter has been resolved by a revision of the RFM Data Deficient Framework.

3. Assist CBs with Implementation of standard Version 2.0 as/if required

salmon was successfully recertified against the RFM standard V2 in June 2020.

4. Implement the new joint CoC standard between AK and Iceland

There is now a unified CoC with Iceland, with a meeting in January 2021 to finalize. The biggest change has been the multi-site CoC procedures and making sure it is compliant with EU multi-site sampling protocols.

When finalized, ABs will be made aware of the new CoC standard, and the RFM is looking at onboarding MRAG-North America to undertake CoC audits. As they are a new CB to the RFM program they will need to run witness audits to become accredited.

5. Enhanced RFM Seal policing within CoC standard. Review and edit the standard by seeking implementation comment from CBs

New brand guidelines and Terms and Conditions for Use of the RFM Certified Seal and Claims were uploaded to the website August 2019.

6. Update website with timely data and CoC system that is searchable

The website has been updated with the latest information for all CoC certificates and holders. [See here.](#)

7. Continue to engage with the FSC Committee for relevant updates

As of Jan 1 2020, the RFM committee was dissolved and the CSC board started to meet and eventually took over the ownership of the program on July 1, 2020.

III. Key RFM / CSC Components

Considerations

- Program Governance Structure
- Policies, Management System and Procedures
- Annual Review and Updates
- CBs and ABs review
- Committee Management
 - Standards
 - Oversight
- Program Team Management
 - Roles and functions

IV. Program Governance Structure

The new program governance structure for the CSC is shown at <https://www.seafood.org/rfm-certification/about-rfm/governance/> . Members of the new governance structure are shown in section VIII, essentially this largely mirrors the previous AK-RFM governance structure with a few new members to the CSC Board.

V. Policies, management system and procedures

A significant fisheries assessment procedural change over 2020 has been a review of the Data Deficient Framework (DDF), a revision of the DDF will be undertaken Q1 2021 to ensure alignment with GSSI V2.

The RFM Quality Management System (QMS) is available on the ASMI website and includes the RFM:

- Controls and Policies
- Roles and Responsibilities
- Key Operating Procedures
- Terms of Reference
- RFM Reports and Certificates for Fisheries
- Lists of Chain of Custody Certified Organizations ([found here](#))

The QMS continues to offer the RFM Program a comprehensive, transparent and structured management system which serves two key purposes:

- Maintains RFM program consistency and credibility which can be externally reviewed and tested.
- Provides a training and legacy tool for new staff and stakeholders to the RFM Program.

VI. Annual Review and Updates

This annual review includes all of the key updates for 2020 regarding the RFM program, including summary results of audit activities.

One key update is the creation of the Certified Seafood Collaborative (CSC) which now owns the RFM program. This organization will first be funded through ASMI means with a view to become a self-sustaining organization under the oversight of the ASMI Board.

The new revision V2.1 standard will be used for all new fisheries that wish to be certified and for fisheries seeking re-certification to the RFM program starting October 1, 2020.

VII. CBs and ABs review

DNV GL Audit

DNV GL is an organization that started in 1864, currently established in 187 countries, and employing 13,000 employees. They have a customer base of around 80,000 customers. The DNV GL Group headquarters is located in Høvik, Norway and is composed of a Maritime Section with Headquarter in Hamburg, Germany, an Oil and Gas Section with Headquarters in Høvik, Norway, an Energy Section with Headquarters in Arnhem, Netherlands, A Business Assurance Section with Headquarters in London, UK, and a Digital Solutions Section with Headquarters in Høvik, Norway.

DNV certifies clients for a number of standards that include BRC (Packaging, Food, Consumer Products, Storage and Distribution), IFS, SQF, SA 8000, Sedex, Rainforest Alliance, ASC and MSC, Global G.A.P, and several ISO Standards.

Accreditation for the RFM Fisheries standard V1.3 (Nov. 2015) was formally granted on the 29th March 2018 by the American National Standards Institute (ANSI) for DNV GL Business Assurance USA, Inc, 1400 Ravello Drive, Katy, TX 77493, USA. Accreditation ID #0848.

The RFM Audit was carried out remotely on the 26th May 2020, key findings below:

OBSERVATION 1: There was no accreditation management representative at the review and as a result the DNV team were not clear on the exact replacement person for SB and on the future clarity of organisation change pertaining to RFM Program management. Recommended that an accreditation representative is at the future reviews. DNV updated the review team that RFM Program management team is transitioning to a US based team and the details will be forwarded to the RFM Program Team once finalized.

OBSERVATION 2: The DNV Certificate on the ASMI RFM Certification website for P. Cod is an uncontrolled Draft and should be removed by the RFM Team

Review Determination: The CB was found to be in compliance with the requirements of the RFM program with no non-conformities. Two observations were noted as a result of the audit and are listed in the 'Findings' section above.

SCS Global Audit

Scientific Certification Systems, Inc., now trading as SCS Global Services, is an established supplier of third-party environmental, sustainability and food quality certification, auditing, testing and standards development. Back in 1984 SCS first began providing third-party certification services. In January 2012, SCS was officially reorganized and recognized as one of California's first Benefit Corporations, a new class of corporation that voluntarily meets different standards of purpose, accountability, and transparency.

SCS has 34 company directors and managers heading the various divisions. To service the RFM CoC program there are currently 5 qualified auditors, 2 of which are contractors, plus additional Quality Assurance staff.

SCS Certifies against several fisheries and aquaculture standards including the MSC, ASC, FairTrade USA. Furthermore, they certify against the Forest Stewardship Council (FSC), Responsible Wood, and Programme for the Endorsement of Forest Certification (PEFC) Chain of Custody certificates. They also certify against BRC, Global GAP and other established standards.

The audit was carried out remotely on the 28th May 2020:

Scope: The CB review was carried out against the RFM CB Requirements, general pillars of ISO 17065 and the new GSSI Benchmark requirements.

Findings: One non-conformance raised re Certificate Format. Previous non-conformances were confirmed to have been corrected.

SAIG (GTC) Audit

SAI Global still operating as Global Trust Certification (GTC), is an established supplier of third-party environmental, sustainability and Chain of Custody (CoC) certification, auditing, testing and standards development. GTC has been a key CB within the RFM program since its inception back in 2010 and provides both fishery assessments to 4 key fisheries within and 55 CoC certified establishments (to both the single and group certification models).

GTC Certifies against several fisheries and aquaculture standards including the MSC, ASC, BAP, IFFO RS, Global Gap and other established standards.

The audit was carried out remotely on the 8th July 2020.

Findings: Non-conformances for document control and record maintenance were encountered.

NC1 - CoC Responsibility: The Scheme Manager for RFM Chain of Custody is not clearly identified or listed in the official organisational chart. It was confirmed that this is not Sam Dignan. SAI GT explained that this was now Juan Aguirre, since Jan 2020. There was evidence of a lack of consistency and evidence of contradictions in CoC audit reports by different auditors and this needs to be addressed. Evidence of formal Technical reviews were made available for review after the audit. Evidence of calibration meetings between CoC auditors should be available. Jacinta McIvor was identified as a Technical Reviewer for some Chain of Custody reports. Evidence of her competency to act as a technical reviewer should be provided.

OB1 : There was no agreed date for an Impartiality Committee meeting in 2020.

OB2: A job outline for Head of Quality Ireland should be made available

OB3: QP3B should have reviewed for accuracy and improvement eg to reference remote auditing where this is permitted and should refer to general or specific remote auditing protocols to ensure consistency. RFM has allowed remoted audits as part of its letter of variance however the methodology used by SAI Global should be detailed for consistency between auditors and decisions.

OB4: A CoC certificate COCALA147 reviewed had the incorrect audit date on the certificate which had not been corrected despite being identified in August 2019.

Accreditation Body (AB) reviews

There was no formal review of either of the two AB's (ANSI and INAB) involved in the program. However, ABs were engaged with in 2020 to communication and remote audit changes relative to the COVID Pandemic. The CB review will remain an annual one while the AB will likely be a 2-year review cycle unless something of significance comes to our attention.

VIII. Committees Management – CSC/ RFM Governance and Transparency

As of July 1, 2020 the ownership of the RFM Program transitioned from ASMI to the Certified Seafood Collaborative (CSC). The CSC is the approving body for all standards, strategy, and policy related to the RFM Program. The CSC/ RFM Governance Structure depicts the following:

- the levels of governance and control;
- the communication channels and exchange between the different bodies highlighted below.

ASMI Board (as of September 2019)

Jack Schultheis, Chair, Kwik' Pak Fisheries

Allen Kimball, Vice-Chair, Trident Seafoods

Mark Palmer, Ocean Beauty Seafoods

Tomi Marsh, Harvester

Tom Enlow, Unisea

Michael Erickson, Glacier Seafoods

Alf "Gus" Skaflestad, Harvester

CSC Foundation Board Members (as of July 2020):

Chair

Mark Fina

United States Seafoods, LLC

Members

Allen Kimball, Trident Seafoods & Current ASMI Board Member

Chris Barrows, Pacific Seafoods Processors Association (PSPA)

Tomi Marsh, Harvester & Current ASMI Board Member

Matt Tinning, At-Sea Processors Association (APA)

Scott Goodman/Jamie Goen Bering Sea Fisheries Research Foundation (BSFRF), Bering Sea Crabbers (ABSC)

Stephanie Quinn-Davidson, Tanana Chiefs Conference

Julie Decker, Fisheries Development Foundation (AFDF)

Tom Sunderland, Trident Seafood (Vice-Chair)

Fisheries Standard Committee:

Chair

Dr. William Smoker

Scientist, Professor Emeritus UAF

Members

R.J. (Bob) Allain

President

Ocean IQ Management Services

Dr. Tom Pickerell

Executive Director, Global Tuna Alliance

Suzanne Ludicello

Eric Schwaab

Vice President, Conservation Programs

National Fish and Wildlife Foundation

Wendy Norden

Science Director, Monterey Bay Aquarium

IX. Program Team Management - Operations RFM Team

The program has been managed by the RFM Team composed of:

- a. Jeff Regnart – Overall RFM program management

Part Time Contractors:

- b. Susan Marks - Sustainability and Certification Advisor
- c. Mike Platt, Alex Caveen & Sam Peacock - V2 Fishery Standard/FSC/GSSI maintenance
- d. Dave Gaudet – Fishery Standard, Glossary, CB training
- e. Wes Toller – Governance

X. Operation - Applicants

RFM Certified Fishery and CoC Organizations are listed on the ASMI website at the following:

CoC: <https://www.seafood.org/rfm-certification/certified-companies/>

Fisheries: <https://www.seafood.org/rfm-certification/certified-fisheries/>

XI. Quality Management System Review

The RFM Program management system is composed of a QMS Document and Procedures Documents. These procedures have been modified in 2020 to reflect the new change in program ownership.

Current RFM Governance & Quality Management System

RFM Quality Management System Manual

- [Responsible Fisheries Management \(RFM\) Quality Management System Manual \(PDF\)](#)

RFM QMS Procedures

- [Procedure 1: CB Approval for RFM Fishery Standard](#)
- [Procedure 2: Application to Certification Procedures for the RFM Fishery Standard Version 2.0](#)
- [Procedure 2 for Version 1.3 of AK RFM Fisheries Standard](#)
- [Procedure 3: CB Approval for Chain of Custody Standard](#)
- [Procedure 4: Application to Certification Procedures for the RFM Chain of Custody Standard](#)
- [Procedure 5: Program Administration – Annual Review, Document Control/Management, and Program of Work](#)
- [Procedure 6: RFM Certified Seal Management and Market Surveillance](#)
- [Procedure 7: RFM Complaints and Appeals Process](#)
- [Procedure 8: Appointment and Control of RFM Assessors](#)

XII. Committees function within the RFM Program

- **Three** committees have formal Terms of Reference established to provide transparency and allow for program oversight:

CSC Foundation Board

- The industry led *CSC Foundation Board* is the RFM program owner, direction on strategy and policy oversight. The CSC devises recommendations for RFM policy, strategy and targets to present to the ASMI Board for approval.

FSC Committee

- The *RFM Fishery Standards Committee* is an international multidisciplinary group of experts who formally and periodically review the Fishery Standard and Scoring Guidance document.

ASMI Technical Committee

- The *RFM Technical Committee* oversees the review and update to the Chain of Custody Standard.

XIII. RFM External Program Assessment Review

ASMI has been active in the GSSI (Global Seafood Sustainability Initiative) and became the first recognized program in July 2016 after an external expert review and public comment process.

The RFM Quality Management System (QMS) has been tested via the GSSI audit review and was found to be robust and fit for the purpose of meeting the GSSI Essential Requirements (Compulsory), and a number of GSSI Supplementary Indicators (Voluntary).

The RFM provided a response to the GSSI in Q2 2020 on the implications of the proposed GSSI V2 (which will be likely launching in Q2 2021), two key things to note:

- The content of supplementary components A.3.15.01 and A.3.15.02 will be merged into A.3.15, meaning that the RFM would need to demonstrate that it implements a mechanism to ensure that disadvantaged and vulnerable stakeholders are able to participate.
- New essential component D.5.11, “The standard does not preclude small scale fisheries from possible certification for Ecolabelling due to the use of less elaborate methods of stock assessment”. This has implications for the DDF framework which will be revised Q1 2021.

XI. RFM Outreach and Communication

RFM continues ongoing outreach and improved communications with specific sectors; including NGOs, Industry and corporate social responsibility and procurement officers in foodservice and retail sectors.

- Attendance and/or speaking at the following events:
None outside of ASMI’s annual meeting for 2020 due to Covid-19 constraints

RFM Communication Tools in use:

- RFM FAQ
- GSSI Fact Sheet

XII. RFM Standard Management

Considerations

- Availability of the V2.1 Standard

XIII. Fishery Standard V 1.2 /V 1.3/ V 2.0 / V2.1

Issue V1.2 is the old version.

Issue V1.3 is the outgoing version.

The V2.0 standard is the incoming standard and will be used for all new fisheries that wish to be certified and for fisheries seeking re-certification to the RFM program starting May 1, 2018.

RFM Fisheries Standard Version 2.1 is a reissue of Version 2.0 reflecting that the scope is changing from only Alaska fisheries to North American fisheries operating within the U.S. and Canadian 200 nm EEZ. Version 2.1 is effective from October 1, 2020.

XIV. RFM Chain of Custody (CoC) Standard

- Issue V2.3: This is the old standard.
- The [RFM CHAIN OF CUSTODY STANDARD VERSION 2.4](#) BECAME EFFECTIVE ON JANUARY 1, 2016. The RFM Chain of Custody Version 2.4 was approved by the ASMI Board in November 2015 for use beginning January 2016. The V2.4 is used for all new applications that wish to be certified to the RFM Chain of Custody Standard program.
- The CoC Standard should be reviewed in the near future to enhance RFM Seal policing.
- Organizations that have been certified are listed on the ASMI Website.
- A joint RFM – Iceland CoC standard will be finalized Q1 2021.

XV. RFM Applicant Client Management

Fishery

- Salmon & Pacific Cod: Fisheries Development Foundation, Inc.
Client Rep: Julie Decker
- Halibut & Black Cod: Fishing Vessels Owners Association
Client Rep: Bob Alverson
- Crab: Bering Sea Crab Client Group LLC
Client Rep: Scott Goodman
- Flatfish: Seafood Cooperative
Client Rep: Mark Fina

- Pollock: Pollock Fishery Client Group, Pacific Seafood Processors Association, At-sea Processors Association, Groundfish Data Bank
Client Rep: Matt Tinning/ Chris Barrows

RFM Chain of Custody / Traceability and Seal Management

- The COC certified organizations are listed on the ASMI Website

XVI. Complaints

There have been no complaints made to ASMI/CSC about the RFM Program during 2020.

Future Considerations and Objectives for 2021

The RFM Management should suggest Program Objectives for 2020 and these should be discussed and agreed between the CSC Committee/Foundation Board & ASMI Board

The following RFM objectives have been suggested for 2020:

- Verify that CBs / ABs are properly reviewed/audited;
- Maintenance of GSSI Benchmarking Approval and participate in the GSSI standard review.
- Assist CBs with Implementation of standard Version 2.0 as/if required;
- Expansion of the program to other fisheries in North America (including Canadian EEZ)
- Continued work with our fellow global RFM partners,
- Alignment of RFM and MSC CoC processes so as to allow for an equivalency audit.
- Update website with timely data and CoC system that is searchable.