



## **2021 Responsible Fisheries Management (RFM) Program Internal Annual Program Review Report December 2021**

**Review Window: Jan 2021 – Dec 2021**

### **Management Review Team**

- Jeff Regnart (JR) – RFM Program Manager
- Mike Platt (MP) – Consultant

The comments and findings from the review are intended to be used to inform RFM Management and advisory committees, Certified Seafood Collaborative (CSC) 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 Program 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, strategies, and policies related to the RFM Program. The CSC Foundation Board Members can be found in section VIII.

#### **Fishery Standard**

No of Fisheries Certified – 8

No of Fisheries Certified to V2.1 – Salmon 9<sup>th</sup> March 2021 CB GTC

No of Fisheries in Recertification to V2.1- Crab Commenced June 2021 CB GTC

No of Fisheries due for Recertification in 2022 – 4 - Halibut CB GTC; Pollock CB DNV; Pacific Sablefish CB GTC; Cod CB DNV

No of New Fisheries in Application – 1 - US west coast fishery has applied

#### **Chain of Custody (CoC) Standard**

No of Chain of Custody Units Certified – 62

The RFM Program has expanded to fisheries in North America (US and Canadian EEZs) and continues to work with fellow global RFM partners, notably Iceland, and has now aligned the RFM CoC standards for both RFM Programs so as to allow for an equivalency audit.

2021 has been another challenging year for all certification programs due to the continuation of the Covid-19 pandemic since 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's<sup>1</sup> stating that all initial, annual surveillance and recertification assessments can be assessed remotely during this pandemic.

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

All Certification Bodies in the RFM Program have been audited remotely in 2021. Along with the audits, the RFM Program sent email updates/correspondence to the AB and CB on the Letter of Variance for Covid and several changes in the procedures that govern their work.

RFM Audits have moved to remote auditing due to the extraordinary circumstances and according to the guidance given by the Program Management Team. Direction on policies was derived from GSSI and IAF guidance documents plus the program also aligned with remote assessment processes being operated by other fishery certification programs e.g. MSC and MSC CoC, to ensure that the applicants all had a similar experience during these extraordinary times if they were applying for dual certification status.

The CSC Board meets every three months since they took over the ownership of the program on July 1, 2020.

Version 2.1 of the RFM Standard 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.

Work has now been completed following an extensive review of the Data Deficient Framework (DDF), a new revision of the DDF was completed by the end of Q2 2021 and will be piloted when an appropriate fishery is located at some point in 2022.

The RFM Program has received no external complaints during 2020.

## **II. Review of RFM Objectives set for 2021**

The following RFM objectives were suggested in the 2020 Internal Review for the year 2021:

### **1. Verify that CBs are properly reviewed/audited**

All CB office audits were undertaken remotely, with JR and MP attending on behalf of the RFM Program. 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 has now been launched and it will be a key priority within 2022 to maintain this alignment and recognition status. The new areas of interest are the following A3.15 RFM would need to demonstrate that it implements a mechanism to ensure that disadvantaged and vulnerable stakeholders are able to participate, work on how best to reach out to these stakeholders during the next standard reviews will be a priority during the stakeholder engagement process. **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 now been resolved by a revision of the RFM Data Deficient Framework.

### **3. Assist CBs with Implementation of RFM Fishery Standard Version 2.0 as/if required**

Alaska salmon was successfully recertified against the RFM Fishery Standard V2 in June 2020. Alaska Crab has now commenced this certification process starting in June 2021. Four other certified fisheries will be assessed to the new version in 2022

#### **4. Expansion of the program to other fisheries in North America (Including Canadian EEZ)**

The Responsible Fisheries Management (RFM) certification program is pleased to announce that the Pacific Whiting (Hake) Mid-Water Trawl fishery, covering US federal EEZ waters off Washington, Oregon, and California, is being [assessed to the RFM Fishery Standard on behalf of the Pacific Whiting Conservation Cooperative \(PWCC\) in collaboration with all sectors of the US whiting fishery](#). MRAG Americas, Inc. is conducting the independent assessment for PWCC in partnership with the entire US whiting fishery. Site visits, assessment team, and timelines are available at the link above.

#### **Continued work with our fellow global RFM partners**

There is now a unified CoC with Iceland which has been finalized. The biggest change has been the multi-site CoC procedures and making sure it is compliant with EU multi-site sampling protocols.

All CBs and ABs were made aware of the new CoC standard.

In addition, the RFM Program has been supporting the Norway RFM initiative over the past 12 months to develop a fishery certification program that will be in alignment with the RFM Program

The RFM Program has begun 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 before they can become accredited by ANAB within the USA.

#### **5. Alignment of RFM and MSC CoC processes, allowing for an equivalency audit.**

New guidelines and checklists were reviewed to determine the equivalency between the two programs, which will allow the CB to conduct one audit for each applicant that will cover the requirements of both standards. This approach has now been adopted by the CBs within the program. An exercise was completed that concluded no changes were required for the program documents in light of this alignment piece of work.

### **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://rfmcertification.org/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 2021 has been to finalize the review of the Data Deficient Framework (DDF), to ensure alignment with GSSI V2.

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

- 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 (<https://rfmcertification.org/certified-companies/>)

The QMS continues to offer the RFM Program a comprehensive, transparent, and structured management system that 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 2021 regarding the RFM Program, including summary results of audit activities.

Key updates include the creation of the Unified CoC Program with Iceland RFM, the finalization of the newly revised Data Deficient Framework, and the expansion of the RFM Program to allow certification of fisheries in North America outside of the state of Alaska.

## **VII. CBs and ABs review**

### **DNV GL Audit 28<sup>th</sup> May 2021**

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. The RFM Program is overseen by the Business Assurance Division and all operations for the RFM Program are based in their USA offices.

The accredited office for the RFM Program is Katy, Texas. This address details and accreditation number are accurate on the ANAB accreditation certificate.

The Accreditation Body (ANAB) audit entails reviews of a number of general quality management programs and some specifics of RFM Program last audit 14<sup>th</sup> May 2020 next one scheduled 9<sup>th</sup> Sept 2021

#### **Findings:**

**Review Determination:** The CB was found to be in compliance with the requirements of the RFM Program with no non-conformities. The two observations noted during the last review meeting have now been rectified.

#### **New**

**Observation 1** – If JB is the lead auditor for the fishery assessment team she should complete and pass a Lead Auditor qualification course for the reasons discussed during the review.

**Observation 2-** DNV will need to ensure that all RFM assessors are fully trained in the requirements of RFM Fishery Standard V2.1 in advance of the recertification assessments.

**Question raised** - DNV wished to gain clarity on whether or not remote/virtual assessments can be done for recertification, and the CSC team have confirmed this now with DNV

### **SCS Global Audit 22 July 2021**

Scientific Certification Systems, Inc., operating 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. Benefit Corporations are required to consider the impact of their decisions and to describe their environmental and social performance each year in an [annual report](#) made available to the public.

SCS has approximately 34 company directors and managers managing the various divisions. There are approximately 230 personnel employed by SCS. To service the RFM Program there are currently 6 qualified auditors, 3 of which are contractors, plus additional Quality Assurance staff 3 in total who conduct the technical reviews and certification processes.

Key RFM contacts in the company. Adam Spiegler (RFM CoC Lead auditor and Program Manager) and Victoria Norman (Quality Assurance Director)

Key RFM Auditor: Hugh Bertmaring (completes 70% of audits)

Accreditation is via ANAB – the accreditation certificate was reviewed and found to be correct. On NC was found at the office audit on the signing of the contract in advance of audit- Corrective action plan in place and accepted by ANAB

Other certification activities: 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.

**Findings:** One non-conformance raised on the close off of Major NC is not in alignment with the current Procedure 4. This was discussed with SCS in detail and the outcome is that CSC team will amend this requirement and report back to SCS on the new.

## **NSF (GTC) Audit 16<sup>th</sup> July 2021**

Global Trust Certification (GTC) Ltd is an Irish-registered company now wholly owned by NSF. GTC will retain in autonomy as a CB within the NSF organization. Some of its Policies and Controls are agreed as part of the larger NSF Global Company and some are regional controls and policies. Part of the GTC Quality Management System is being integrated into the NSF Global Quality Management System. Some parts remain Global Trust referenced.

A few key GTC/NSF persons have left the Ireland organization since the 2020 CB review, the Technical Manager Niall O’Rahelly and Jaun Aguirre the CoC Scheme Manager

The new organization charts presented to RFM showed the General Manager Ireland (Aquaculture and Fisheries) reporting to the Global MD Supply Chain and Agri Sarah Krol. Ruth Gallo is now just in position to look after all CoC schemes and RG is based in Spain

GTC/NSF is an experienced CB and is also an MSC, GSA/BAP, Marin Trust (IFFO RS), Iceland RFM, Louisiana RFM and ASC Certification Body. These are the other key lines of revenue for GTC.

GTC/NSF is accredited by the Irish National Accreditation Body (INAB) for ISO 17065. NSF has wider scopes of accreditation via several other accreditation bodies 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 Alaska 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.

### **Findings:**

The Non-Conformance and Observations raised during the last review have now been or being actioned and verified by the Review Team

**One new Non-Conformity-** CoCALA 112 and 201 on the CSC website have certificates that were extended beyond the 3 years which is not allowed by the RFM Program. The certificates have 6 months added even though only a 3-month extension is allowed to their previous certificate before the new certificate is issued. This is nonconformity to the RFM processes. The reason is the possible lack of CoC oversight in the past. RG is now in place, and she is looking at all certificates to ensure that this will not occur in future

**Observation** -The Non-Conformity raised in last year's review was discussed and the new manager RG shall be conducting all technical reviews with the support of Jim Daly. RG is still very new in the post so a more formal review of these technical review processes will be conducted at the next CSC RFM review.

**Question for RFM Program** Will discuss with INAB on looking at the possibility of whether or not their audits can be done in person and when they intend to complete their next witnessed assessment. Meeting on 4<sup>th</sup> Oct with INAB confirmed that due to COVID, this would still be remote.

### **Accreditation Body (AB) reviews**

There was no formal review of either of the two ABs (ANSI and INAB) involved in the program. However, ABs were engaged within 2021 to communicate the remote audit changes relative to the COVID Pandemic plus gave a program update. Hopefully, in 2022 the program can meet with the ABs in person for the annual review.

## **VIII. Committees Management – CSC/ RFM Governance and Transparency**

The CSC is the approving body for all standards, strategies, and policies 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.

### **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), Alaska Bering Sea Crabbers (ABSC)

Stephanie Quinn-Davidson, Tanana Chiefs Conference

Julie Decker, Alaska Fisheries Development Foundation (AFDF)

Hannah Lindoff , ASMI Ex-officio board member

Tom Sunderland, Trident Seafood (Vice-Chair)

## **Alaska 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, on outreach, CoC, programs collateral
- c. Tricia Sanguinetti, RFM website, media, eblast, collateral
- d. Mike Platt, Alex Caveen (In part for 2021) & Sam Peacock - V2 Fishery Standard/CoC/FSC/GSSI maintenance
- e. Dave Gaudet – Fishery Standard, Glossary, CB training
- f. Wes Toller – Governance

## **X. Operation - Applicants**

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

CoC: <https://rfmcertification.org/certified-companies/>

Fisheries: <https://rfmcertification.org/certified-fishery-species/>

## **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**

*All the RFM policies and procedures can be located on the CSC website*

<https://rfmcertification.org/about-rfm/quality-management/>

*RFM Quality Management System Manual*

- Responsible Fisheries Management (RFM) Quality Management System Manual (PDF)

#### *Alaska 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 Alaska 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.

### **Technical Committee**

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

## **XIII. RFM External Program Assessment Review**

The RFM Program 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 Program provided a response to the GSSI in Q2 2020 on the implications of the proposed GSSI V2 which has now been launched in Q4 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 Alaska 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, Alaska 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 2021 due to ongoing Covid-19 constraints

RFM Communication Tools in use:

- RFM FAQ
- GSSI Fact Sheet
- E Mail – E Blasts
- RFM 101 Brochure
- RFM Video

## **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 and all new certifications and re-certifications will move from this to V2.1.

The V2.1 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 the latest release of the new V2.0 standard and is a reissue of this standard reflecting that the scope is changing from Alaska-only fisheries to North American fisheries operating within the U.S. and Canadian 200 nm EEZ. Version 2.1 became effective from October 1, 2020. No other changes were made to the Standard.

#### **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 has now become fully aligned with the Icelandic CoC to enhance RFM logo policing and to allow joint assessments.
- Organizations that have been certified are listed on the RFM Website.

#### **XV. RFM Applicant Client Management**

##### **Fishery**

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

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

### **RFM Chain of Custody / Traceability and Logo Management**

- The COC certified organizations are listed on the RFM Website

### **XVI. Complaints**

There have been no complaints made to ASMI/CSC about the RFM Program during 2021.

### **Future Considerations and Objectives for 2022**

**The RFM Management should suggest Program Objectives for should this be 2022 and these should be discussed and agreed between the CSC Committee/Foundation Board**

The following RFM objectives have been suggested for 2022:

- Verify that CBs / ABs are properly reviewed/audited
- Maintenance and attain GSSI Benchmarking Approval for V2
- Assist CBs with Implementation of standard Version 2.1 as/if required as number of fisheries will be getting recertified in this year
- Continued expansion of the program to other fisheries in North America (including Canadian EEZ)
- Continued work with our fellow global RFM partners
- Review CoC processes at first point of landing to simplify this process for the supply chain
- Test the new DDF on a fishery to ensure the latest review is an improvement on the last version
- Update website with timely data and CoC system that is searchable