

RFM Procedure 4 Application to Certification Procedures for the RFM Unified Chain of Custody Standard

Responsible Fisheries Management (RFM) Certification Program

Fully Aligned to ISO 17065



**RFM Procedure 4 Version 5.1: Application to
Certification Procedures for the RFM Unified Chain of Custody Standard,
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1. Purpose and Scope

This document defines the procedures required for all Applicants wishing to apply for certification approval to the Responsible Fisheries Management (RFM) Unified Chain of Custody Standard. These procedures ensure that all applications and recertifications of existing certificate holders are processed in a consistent, professional and equitable manner. These procedures offer Certification Bodies a format that can be used independently or incorporated into existing procedures.

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

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

This procedure defines the method (for multi-site (group) certification) by which initial recertification and surveillance audits for certification to the CSC RFM Unified Chain of Custody Standard are evaluated and processed.

2. Inquiries and Requests for Application

Any inquiries to the Certification Body concerning RFM Unified Chain of Custody assessments will be directed to the Certification Body Program Manager, who must be fully trained in the RFM Unified Chain of Custody (CoC) Program. The Certification Body will discuss with the potential applicant the full details of the assessment application process including the Standard's requirements, scope of assessment, time frames, and assessment fees. Following the initial contact, the potential applicant will be sent an information packet containing an official CoC program application form and a comprehensive list of all the RFM Unified CoC program requirements.

3. Application Processing

Applicants must submit a completed RFM Unified CoC Program application form received from the Certification Body to apply for CoC certification under the RFM Program.

A submitted application will serve as a temporary contract between the potential applicant and the Certification Body, thereby confirming the applicant's commitment to abide by the Certification Body certification process protocols as set forth in the informational packet.

On receipt of an application, the Certification Body will record the date of receipt and review the application to establish an appropriate assessment plan, including the timeframe for the assessment, based on the nature, size, complexity, and technical resources of the applicant's operations and the associated risks. The Certification Body may contact the applicant to obtain additional information needed for the assessment plan.

The Certification Body will provide the assessment plan to the potential applicant along with a cost estimate for the assessment.

All information submitted by the potential applicant shall become the property of the Certification Body and

will be available to the Certified Seafood Collaborative (CSC) upon request.

4. Assessment Personnel and Scheduling

All assessments are arranged by the Certification Body and must be conducted by an approved RFM assessor (see RFM Procedure 8 – Appointment and Control of RFM Assessors).

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

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

The Pre-assessment Phase of the Audit:

The pre-assessment discussion will be scheduled on a date agreed to by the applicant and the Certification Body. The assessment will include a discussion on the requirements of the RFM Unified Chain of Custody Standard relative to the applicant's customers, and products to be assessed to determine the most appropriate audit plan for the applicant.

Audits:

Within a 12-month time period from the Pre-assessment, an audit must be conducted at the applicant's site. The Certification Body must report any failure to meet this 12-month requirement to CSC RFM Program Manager stating the reasons for such failure.

Travel Arrangements:

For all applicant assessments, all necessary travel arrangements (such as flights, hotels and ground transportation) must be made by agreement with the consulting Certification Body and the applicant.

5. Assessment Standards and Scope

Assessments shall follow the requirements of the RFM Unified CoC Standard and use the approved Assessment Report checklist provided by the Certification Body coordinating the assessment.

In the event that additional assessment requirements arise, such as checking compliance with product specifications, a complaint or appeal investigation, the scope of the applicant's assessment plan can be modified to meet these additional requirements.

6. Pre-assessment Process

As part of the pre-assessment process, applicants shall submit details of the traceability systems used on their site and the components and operation of their quality management systems to the Certification Body to support a pre-evaluation of the operation before the assessment to determine the most appropriate audit plan for the applicant to protect the integrity of the certificated RFM species.

7. Assessment Process

The Assessment incorporates multiple factors gathered from an applicant's application and from the on-site assessment. These include, but are not limited to the following:

- a) Product risk considering the applicant's position within the supply chain;
- b) Applicant size and technical resources, including the production area, product lines, employees, and employee turnover; and
- c) The Applicant's knowledge of the RFM CoC Program and the consistency of the program's requirements with existing operations.

7.1 Onsite assessment Requirements

The Certification Body will determine the site assessment length based on the associated risks that were used to determine the applicant's assessment plan.

The onsite assessment shall include:

- a) An open meeting; to confirm the scope of the applicant's assessment
- b) A review the traceability and quality management systems and assessment of their implementation;
- c) An inspection of the production facility to verify implementation of the traceability systems
- d) Interviews of personnel responsible for oversight and operation of the traceability and quality management systems;
- e) A review of the production facility inspection to verify compliance of the reviewed systems with the requirements of the RFM CoC Standard and to determine whether further documentation and verification is needed;
- f) A final review of findings in preparation for the closing meeting; and
- g) A closing meeting to discuss compliance with the RFM CoC Standard.

Special Note- Covid 19 – An Extraordinary Event Declared

Letter of variance with regards to the Coronavirus-19 Pandemic (18th March 2020)

This letter of variance allows for all required certifications/audits/recertifications on-site requirements found in this procedure to be waived until further notice or as instructed by the CSC RFM Program Manager.

Clause 7.1 RFM CoC ONSITE assessment requirements and **clause 9.1 Re-certification Audit Scheduling**, should be followed using **REMOTE audits** when possible, in order to reflect all sort of activities and processes carried out by clients. Auditors should request photographs and videos as evidence to clarify points of risk in the identification and segregation of certified products to determine compliance with the CSC RFM CoC standard requirements and procedures.

7.2 Conformance Levels

Level Type	Description	Certification Body Action
<p>CRITICAL (Assessment)</p>	<p>This level indicates a substantial non-conformance or failure to or gap in compliance with the Standard that is highly likely to result in mislabeling of fish or there is clear evidence deliberate mis-labeling has occurred.</p> <p>For example, seafood intended to be labeled as certified under the RFM Program was found to be intermingled with fish from a fishery that is not certified fish is likely to be mislabeled.</p>	<p>Assessment - Certification Body does not grant certification and sets up a re-evaluation to verify that non-conformance has been resolved and that the applicant has implemented systems that prevent the non-conformance from recurring.</p> <p>Surveillance Audit - Certification Body immediately suspends certification (pending an investigation), informs the CSC of the suspension, and sets up a re-evaluation to verify non-conformance resolution and that the approved applicant has put in place systems that prevent the loss of chain of custody from reoccurring.</p>
<p>MAJOR</p>	<p>This level indicates that there is a substantial non-conformance or failure or gap in compliance with the Standard that has potential to result in mislabeling of fish.</p> <p>For example, the documentation of the traceability system is found to be flawed the system may present a significant risk of mislabeling of fish.</p>	<p>Assessment - Certification Body issues certification once an adequate action plan has been submitted to correct the non-conformances.</p> <p>Audit - Certification Body will inform the approved applicant of this Major non-compliance and will ask for an action plan to rectify the non-compliance. If no action plan is forthcoming or in the view of the Certification Body the action fails to rectify noncompliance, the approved applicant will have its certification suspended (pending an investigation).</p> <p>The Certification Body will inform the CSC of any suspension, and will set up a re-evaluation to verify non-conformance resolution, to ensure that the approved applicant has put in place systems to prevent the recurrence of the non-conformance.</p>

Level Type	Description	Certification Body Action
MINOR	This level indicates that non-compliance with the Standard that is unlikely to result in mislabeled fish.	Assessment and Audit - Certification Body will inform the approved applicant of this Minor Non- Compliance and will ask for an action plan to rectify the non-compliance on an agreed schedule prior to the next surveillance audit. If the action plan is not completed prior to the next surveillance audit, the non-compliance will be reclassified as a Major and will follow the course of action thereunder.
MINOR (Surveillance Audit)	This level indicates that the non-conformance fails to comply with the principles of the Standard.	

7.3 [Closing Meeting](#)

In the closing meeting, the assessor presents their findings to the applicant identifying non-conformances to the RFM Unified CoC standard. From this discussion, the assessor will prepare written findings including the identified non-conformances for use by the applicant's technical representative. These findings will not include any statement as to whether the Applicant has achieved certification.

If a critical non-conformance is established at the closing meeting of an annual surveillance audit, the approved member of the program will be instructed to immediately inform its customers of the suspension of its certificate. Additionally, the existing member will be required to provide its customers with information regarding the corrective action that will be taken to address the non-conformance and the status of its certificate on an ongoing basis.

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

8. Customer Notification of Traceability and Legality Issues

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

In all cases, copies of the Assessment Report can only be sent to a third-party entity with written consent of the Applicant.

9. Annual Surveillance Audit Scheduling

Surveillance audits (except for traders) are scheduled within 4 months of the end of the 12-month intervals following the initial audit, with no audits occurring within 6 months of the previous audit

Surveillance audits for traders is are scheduled within 4 months of the end of 18- month intervals from the initial audit and is conducted by the certification body using an approved remote assessment methodology, based on documentation submitted by the trader for review.

In all cases, the Certification Body ultimately reserves the right to determine Surveillance Audit frequency based upon the inherent product/process risk as well as the results of an Applicant's prior assessments and audits.

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

Audits may be undertaken on short notice (i.e. unscheduled audits), if deemed necessary by the Certification Body.

9.1 [Re-certification Audit Scheduling](#)

The approved applicant must apply for the re-certification audit at least two months before the current certificate is due to expire, in order to allow sufficient time to complete the Audit and recertification prior to that expiration. The scope of the re- certification audit shall include, when necessary, a site visit or site visits, as appropriate.

If in the previous 12 months the approved member has had no products labeled as certified an annual audit is not required to maintain their approval to the RFM Unified Chain of Custody Standard.

10. Issuance of Assessment Reports

A written assessment report issued in the approved format will be sent to the applicant following an assessment. The report will contain a general summary, a performance overview, a summary of non-conformances and the subsequent corrective actions taken, and comprehensive details demonstrating the applicant's compliance with the RFM CoC Standard, including evidence that the applicant, if a primary processor, has met the cost sharing requirements of the client. Evidence may include a list held by either the Client or by the Standards Owner on a designated webpage

11. Non-conformance Follow-up

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

The Certification Body shall evaluate the Applicant's progress in completing the corrective actions and confer with the Applicant concerning that progress and any actions needed for issuance of a certificate within 15 calendar days from the date of the assessment. See Table 7.2 "Conformance Level" for appropriate Certification Body actions.

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

12. Final Assessment Report

After the onsite assessment, the assessor shall prepare a final Assessment Report for submission to the Certification Body Program Manager/Administrator approval.

The Certification Body Program Manager/Administrator will verify the following:

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

The Certification Body Program Manager/Administrator shall submit the report with the file of documented evidence to the Certification Committee for review to determine if the applicant has complied with all clauses of the RFM Unified CoC Standard.

Within 3 working days of approval of the final Assessment Report, the Certification Body shall send the certification decision and a copy of the final Assessment Report to the applicant.

The certification decision shall be:

- a) Certification Achieved,
- b) Certification Not Achieved, or
- c) Certification Not Granted

In the case of a ***Certification Not Achieved*** decision, the applicant will be required to provide additional information requested by the Certification Committee within seven (7) working days of the notification.

In the case of a ***Certification Not Granted*** decision, the applicant has failed to demonstrate that it meets the requirements of the RFM Unified CoC standard.

13. Issuance of Certificates

Certification Body Program Manager/Administrator who oversees the RFM Certification Program governs the issuance of the assessment certificate to an applicant. The certificate will be in the standard's approved format and include following:

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

The Certification Body shall retain possession of the certificate at all times.

If any substantial changes occur to the applicant's premises or products, the applicant must provide immediate written notification of these changes to the Certification Body. Changes to the premises or products could result in the suspension or withdrawal of the certification.

14. Applicant Records

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

For a period of five years, the Certification Body and Applicant will each retain copies of the following documents in either hard copy or electronic file format:

- a) Application form;
- b) Site-visit confirmation letter;
- c) Site-visit schedule;
- d) Assessor authorization to conduct assessment, as applicable;
- e) Assessment report forms;
- f) Letters detailing non-conformance, as applicable;
- g) Applicant responses on corrective actions taken;
- h) Assessor confirmation of resolution of non-conformances;
- i) Minutes of certification meetings and reviewers comments;
- j) Applicant notifications of certification decision;
- k) Final Assessment Report;
- l) Certification and acknowledgement of receipt.

As a part of annual audits, the assessors will schedule and conduct a review of the applicant's files.