



**2023 RFM Program
Internal Annual Program Review Report
Date 1 Nov 2023**

Review Window: Sept 2023 – Oct 2023

Management Review Team

- Jeff Regnart
- Peter Marshall
- Dave Garforth
- Michael Archer

The comments and findings from this review are intended to be used to inform the RFM Management and advisory committees, on what areas of the Program have been reviewed both internally and externally. It highlights those that are working well and what areas of opportunity there may be for Program and/or policy and procedural improvements. This review is also an essential component of the RFM Quality Management System and the GSSI standard – re scheme integrity management.

The review covers the areas of

- Scheme performance
- Performance of certification and accreditation bodies.
- Review Application to Certification Procedures
- Review of QMS and Governance
- Committee membership and meetings
- Programs of work
- Complaints and appeals
- Potential areas of Risk

The review was conducted over 2 months by the RFM support team.

I. Overall Program Headlines

GSSI External review: This has been a positive year of market development and review for the RFM program which has seen the RFM program gain the first full re-approval for GSSI Program recognition. GSSI is an extremely important initiative and will continue to provide, respected, third party verification of the RFM Program.

Standards: Standards remain unchanged. The Program has issued some standard variance guidance to the Certification Bodies for Chain of Custody. This relates to subcontractors. All CBs have been externally reviewed by their relevant ABs.

Certifications: All four certification bodies have been audited by both their ABs and the RFM team and found to be in compliance with the RFM guidance and expectations.

Complaints - The Program has received one external complaint from a CB regarding a contract that it failed to win. An investigation found that the CB had not utilized the most up to date Program guidance.

Risk Review: There have been some US media reports regarding forced labor in the seafood sector in regions of China. As a result the RFM team has reviewed the certification activity in China and notified CBs operating in the China area to be extra vigilant regarding audits and audit report reviews.

II. **Review of RFM Objectives set for 2023**

The RFM Program has met its stated 2022-23 objectives

- ☐ QMS implementation for full GSSI Recognition.
- **Completed – GSSI Re-Recognition in 2023**
- ☐ Outreach and Consultations to gain advocacy and greater market recognition
- **Completed -MOU with Global Seafood Alliance 2022**
- ☐ Unify Chain of Custody Standard & process
- **In Place – Unified Chain of Custody Standard**
- ☐ Training and on-boarding of any new Certification Bodies / Auditors
- **Completed – MRAG approved and accredited via ANSI**
- ☐ Training and updating Accreditation Boards
- **Completed via emails – ANSI / INAB**
- ☐ Certification cost reduction for Fishery Client Certification
- **WIP – DNV costs have been reduced**

III. **Key RFM Components**

Considerations

- Program Governance Structure
- Approval of Controls and Policies
- Management System and Procedures

IV. **Governance Management**

The Governance structure has been reviewed by GSSI during this period.

The structure described on the RFM Website is accurate.

- RFM Board of Directors
- RFM Steering Committee (Mgt Board)
- RFM Fishery Standards Committee (FSC)
- RFM Unified Chain of Custody Committee
- RFM Support Team

The RFM Quality Management System (QMS) is uploaded onto the CSC RFM 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

The RFM CSC website was updated in 2023 and all the relevant links were checked and found to be updated.

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.

V. **RFM Governance and Transparency**

As part of the RFM QMS, the Program describes and presents the RFM Program Governance structure. This is posted on the RFM website – this was reviewed and found to be largely accurate.

- Tom Pickerell to be removed from FSC due to change in job roles

Note to Tom Pickerell sent to thank him for his contributions.

The RFM Governance structure was reviewed by the GSSI Audit team and found to be in alignment. This included the following:

- Incorporation papers
- Licenses
- Registrations
- Impartiality policy
- Impartiality clauses in the CB and AB contracts
- Organization structure
- Statute and Bylaws
- Key personnel roles – (responsibility and authority) – job description

Key person / entity for Standards Mgt and the publicly available 'Standards

Key person / entity for Standards Mgt and the publicly available 'Standards Management Procedure' in appropriate languages to include:

- Setting
- Reviewing
- Revising
- Assessing
- Verifying
- Approving

- Decision making powers of each body
- Consensus Policy for each committee

- Managing conflict of interest procedure and statements
- QMS
- Governance Selection Process
- Stakeholder Composition
- Review of stakeholder inputs and how they have reached top governance
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VI. **Operations - RFM Team**

The resource for the team is appropriate for the size of the Program

No change to team

- a. Jeff Regnart – Client liaison/ V2 Fishery Standard / RFM Committee /GSSI/ FSC
- b. Susan marks - CoC Oversight
- c. RS Standards – Certification/Accreditation/Integrity /GSSI/QMS support

VII. **Operation - Applicants**

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

There have been no issues with Fishery or Chain of Custody Applicants

VIII. Quality Management System Review

The RFM Program management system is composed of a QMS Document and Procedures Documents

QMS – This is published on the RFM website and has had some minor adjustments over the past year to better align with GSSI requirements

Procedures

- Procedure Versions were updated and published on the website
- Changes were needed during the year to better align with GSSI requirements

Procedures

- Procedure 1: CB Approval for Fishery Standard – Reviewed
 - Procedure 2: Application to Certification Procedures for Fishery Standard – Reviewed
 - Procedure 3: CB Approval for Chain of Custody - Reviewed
 - Procedure 4: Application to Certification Procedures for Chain of Custody – Reviewed
 - Procedure 5: RFM Program Administration V5.1 Nov 2022– Reviewed
 - Procedure 6: RFM Certified Logo Management and Market Surveillance - Reviewed
 - Procedure 7: Complaints and Appeals- Reviewed
 - Procedure 8: Appointment and Control of Assessors V1.1 Nov 2022 V5.1 Nov 2022 – Reviewed
 - Procedure 9: Extraordinary Events and Remote Assessment V1.1 Nov 2022 - Reviewed
 - Procedure 10: Standard Development Procedure - Reviewed
- There is currently some development work on Data Limited Fishery Scoring Documents. An MRAG doc is in pilot testing. This document will be passed to FSC when tested

IX. Committees within the RFM Program

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

RFM Committee (Board)

- The industry led *RFM Committee* constitutes the oversight and management committee for the RFM Program. The Committee devises recommendations for RFM policy, strategy and targets

FSC Committee (Fishery)

- The *RFM Fishery Standards Committee* which is a change from the *Conformance Criteria Committee (CCC)*, an international multidisciplinary group of experts who formally and periodically review the Fishery Standard and Scoring Guidance document.
- Current members are listed on the RFM website.

Tom Pickerell has moved from Global Tuna Alliance to the Pew Foundation and is required to step down from the Committee.

The next proposed committee meeting is Spring 2024

Current Program of Work can be found on the website: There are no current standard development plans

Unified Chain of Custody Technical Advisory Committee (TAC)

- The *RFM Unified CoC Committee* oversees the review and update to the Chain of Custody Standard. This is a combination of persons from the Iceland RFM and sector and from North American RFM and sector.
- Current members are listed on the RFM website

The next proposed committee meeting is late 2024

Current Program of Work can be found on the website: There are no current standard development plans

X. RFM External Program Assessment Review

CSC has been active in the GSSI (Global Seafood Sustainability Initiative) review and became the first re-approved program in 2023 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

All RFM QMS Procedures were found to be aligned with GSSI and during the GSSI audit

The RFM Team are expected to keep GSSI up to date with key changes and also respond to requested for information.

XI. **RFM Outreach and Communication**

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

- Attendance and/or speaking at the following events:
 - Boston Seafood Show
 - European Seafood Show
 - Japan Seafood Show
 - Responsible Seafood Summit

RFM Communication Tools have been created and are on the CSC RFM website

XII. **RFM Standard Management**

Considerations

- Program of work

XIII. **Fishery Standard V 2.1 Oct 2020**

- Fisheries that have been certified are listed on the CSC Website
 - 8 Alaska Fisheries
 - Pacific Whiting
- Program of Work – FSC to review Fishery Standard

The Gulf of Mexico Shrimp fishery is currently in assessment. Client is the American Shrimp Producers Association.

XIV. **RFM Unified Chain of Custody (CoC) Standard 2.5 Jan 2023**

- No issues with this Standard
- Organizations that have been certified are listed on the RFM Website
- 73 Organizations are listed as certified. This includes both single site and multi-site operations

- Program of Work:

XV. **Certification Body (CB) Management**

- The CB MRAG has progressed to accreditation with ANSI
- This means four CBs are now active with the RFM Program.

Based on 2023 CB reviews (Aug-Sept) the CBs are performing to expectations and RFM Criteria. There would be some benefit gained from calibration of auditors and guidance via a standard CB CoC Audit report format would help. There is some disparity between CBs regarding the length of time between audit and CoC certification. RFM Program could review and advise on this.

Most CBs are still referring to the Program as Alaska RFM in documents rather than CSC RFM.

SCS are the CB with Non-Conformances during the performance period in 2023.

SCS had a number of NCs relating to Non-Conformances being raised as Observations and Certifications being awarded before Non-Conformance close out. This has been addressed and root cause was that the CB following MSC rules and not RFM rules. Calibration of auditors has commenced.

Global Trust /NSF – RFM Fishery and Chain of Custody

A 2023 review took place remotely on 14th Sept 2023. The accredited office is Dundalk, Ireland.

The CB is certifying three fisheries Salmon Recert / Golden King Crab, P.Cod and of Chain of Custody

The CB is active in Europe, China, USA

Overall – performance has improved and zero Non conformances were recorded. A small amount of observations (4) were made relating to editing improvements that could be made to procedures.

AB is INAB and have completed annual audits. Tom White has left the company and has been replaced by Fiona Dargie.

Accreditation Certificate needs updated to reflect new versions.

Coverage: USA, Canada, Chile, China, Ecuador, France, Germany, Iceland, Ireland, Mexico, Morocco, Poland, Portugal, Thailand, Vietnam, Spain

SCS Global – RFM CoC Only

The SCS accredited office is in Emeryville, California.

The 2023 review took place remotely on 21st Sept. SCS carry out approximately 22 CoC audits. Most audits are joint MSC/RFM Audits

A number of Non-Conformances were raised (3). The issue behind most NCs was that they were following MSC certification requirements and directives rather than RFM. Observations had been incorporated into SCS procedures and they are not part of the RFM Program.

Accreditation Certificate needs updated to reflect new versions.

Overall – performance could be improved. This will be addressed through correspondence and CB Review
AB is ANSI.

Coverage: North America, Germany, Mexico, Portugal, Spain

DNV Global – RFM Fishery Only

The accredited DNV 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 /ANSI) audit entailed reviews of a number of general quality management programs and some specifics of RFM Program.

A 2023 review was conducted in August 2023.

No Non conformances were raised and the procedures and control was well maintained

The CB is certifying three fisheries against RFM Standard - Pollock, Sablefish, Halibut

Accreditation Certificate needs updated to reflect new versions.

Overall – CB Performance is good.

MRAG Americas - RFM Fishery and CoC

The accredited office is St Petersburg, Florida.

MRAGs first review was conducted on 15th September 2023. Zero non conformances raised.

The CB has received accreditation via ANSI for Fishery and CoC. The CB certifies three fisheries and only a small number of CoCs have been issued (5).

Accreditation Certificate needs updated to reflect new versions.

They hope to expand their activities.

Overall - Quality of documentation was good and only 4 observations relating to improvement clarifications in the fishery reports were raised.

Coverage: Worldwide with the exception of Russia and China

XVI. Accreditation Body (AB) Management

The RFM program incorporates two AB's. The ISO accreditation is derived from INAB and ANSI.

- Communications
 - INAB – GTC – Contact: Jennifer Quinn
 - ANSI – SCS, MRAG and DNV Contact : Reinaldo Figueiredo

- Competency and Training
 - ANSI and INAB updates from RFM via emails

- Review
 - Review is Based on IAF membership
 - AB's are not willing to have a formal RFM program review

XVII. RFM Applicant Client Management

Fishery

- **Alaska Salmon & Pacific Cod:** Alaska Fisheries Development Foundation, Inc.
 - CB: GTC
 - Exp. March 2026

- **Alaska Halibut & Black Cod:** Alaska Fisheries Development Foundation, In
- CB: GTC
- Exp. May 2028

- **Alaska Crab:** Bering Sea Crab Client Group LLC
- CB: GTC
- Exp: Apr 2027

Alaska Flatfish: Alaska Seafood Cooperative

- CB: MRAG
- Exp: Dec 2024

● **Alaska Pollock:** Alaska Pollock Fishery Client Group, Pacific Seafood Processors Association, At-sea Processors Association, Alaska Groundfish Data Bank

- CB: DNV
- Exp: Feb 2028

● **Alaska Cod:** Alaska Fisheries Development Foundation

- CB: DNV
- Exp: Feb 2028

● **Alaska Atka Mackerel and Rockfish:** Alaska Seafood Cooperative

- CB: MRAG
- Exp: Feb 2025

● Pacific Whiting : Pacific whiting Conservation Co-Operative

- CB: MRAG
- Exp: July 2027

● Gulf of Mexico Shrimp; American Shrimp producers Association

- CB: GTC
- In application/ assessment: April 2023

Information re Reports and Assessments are on the RFM website which is up to date and correct

RFM Chain of Custody / Traceability and Seal Management

- The COC certified organization Listings is on the RFM Website

XVIII. **Complaints**

There has been one complaints made to RFM about the RFM Program during this period

Summary – complaint about RFM Management Consistency. SCS complained that they had lost a potential tender because they quoted a higher fee than another CB based on auditing guidance given. It was subsequently discovered that SCS were using outdated guidance. This resolved the matter

Risk review and Future Considerations and Objectives for 2024-25

The RFM Review team suggest the following Program activities and potential Objectives for 2024

- Maintenance of GSSI Benchmarking Approval
- Review of the CoC report format for CBs to assist with consistency

Risk Review

- Fishery

None registered.

- Chain of Custody

In 2023 the New Yorker magazine detailed the use of forced labor in China to produce seafood that ultimately ends up on store shelves at Kroger, Albertsons Companies, Walmart and major European retailers is causing major concerns.

RFM Chain of Custody certifications are in place in China. The standard does not review scope outside traceability but it would be negative if a company associated with Chain of Custody certification was implicated in forced labor practices.

To mitigate against the risk all chinese certifications will be identified and plotted regarding location and all relevant CBs will be alerted to the news stores and issues. Extra vigilance will be recommended.