



2024 RFM Program Internal Annual Program Review Report

**Date Review Dates: Nov 2024- Jan 2025
Report Issue Date: Feb 2025**

Management Review Team

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

This review was carried out over 3 months and included a structured review of RFM procedures, policies, website and reviews of CB operations and records. 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 and those that are working well and what areas of opportunity there may be for Program and/or policy and procedural improvements.

This review helps the RFM Program to meet its commitments to the GSSI standard and review process – re Scheme Integrity

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

The review was conducted over 3 months by the RFM support team / external consultants.

I. Overall Program Headlines

Program Scope: The geographic scope of the Fishery Standard has been extended. The governance committees of the RFM Program agreed in 2024 to extend the scope of the Program and the Fishery Standard to beyond North America and to international adaptation. This decision resulted in the RFM Fishery Standard version being updated to extend geographic scope but as no standard clauses were changed this did not constitute a full new issue of the standard.

The scoring guidance documents have been revised to make terminologies and references more applicable for fisheries outside North America. No fisheries outside North America have applied for certification at the time of this review.

GSSI were informed of the scope decision before this was publicly announced in 2024.

Certifications Review: All four certification bodies have been audited by the RFM Team in 2024 and were found to be in compliance with the RFM guidance and expectations.

All CBs have also been audited by their IAF accreditation bodies.

One new certification body (Control Union) is in application for accreditation extension to the RFM Standard.

One new fishery was certified in 2024. The Gulf of Mexico Shrimp fishery was certified by NSF/Global Trust. The Client is the American Shrimp Producers Association.

There has been no significant increase or decrease in the number of Chain of Custody certifications in 2024.

Complaints - The Program has received no external complaints.

II. Review of RFM Objectives set for 2024

The RFM Program has met its stated 2023-24 objectives:

- QMS implementation for full GSSI Recognition.
 - **In-Place – GSSI MOCA Reevaluation in 2024-25**
- Outreach and Consultations to gain advocacy and greater market recognition
 - **Completed -MOU with Global Seafood Alliance / MarinTrust**
- Unify Chain of Custody Standard & process
 - **Completed – Unified Chain of Custody Standard**
- Training and on-boarding of any new Certification Bodies / Auditors
 - **In Process – Control Union approved and seeking accreditation**
- Training and updating Accreditation Boards
 - **Completed – ANAB / INAB**
- Certification cost reduction for Fishery Client Certification
 - **In Process**

III. Review of Key RFM Components

Considerations

- Program Governance Structure
- Approval of Controls and Policies
- Management System and Procedures
- Annual Review and Updates
- Committee Management
 - Standards
 - Oversight

- **Governance Management**

The structure described on the RFM Website is accurate.

- RFM Board of Directors
- RFM Steering Committee (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 continually updated in 2024 and all the relevant links were checked and found to be correct.

The Quality Management System (QMS) has not changed in 2024 and 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.

IV. **RFM Governance and Transparency**

As part of the RFM QMS, the Program describes and presents the RFM Program Governance structure. Procedure 5 related to document governance and this procedure has not been changed since 2022.

GSSI externally reviewed the RFM Governance structure in late 2024 as part of the MOCA process and in Feb 2025 found this to be in alignment. This included the following:

- Incorporation

- Licenses
- Registrations
- Impartiality policy
- Impartiality clauses in the CB and AB contracts
- Organisation 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

V. Operations - RFM Team

The resource for the team is appropriate for Fishery and CoC numbers
Susan Marks has left the RFM team and replaced by Tricia Sanguinetti.

- a. Jeff Regnart – Client liaison/ V2 Fishery Standard / RFM Committee /GSSI/ FSC
- b. Tricia Sanguinetti – Communications / Chain Of Custody management
- c. RS Standards – Certification/Accreditation/Integrity /GSSI/QMS support

VI. 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

VII. Quality Management System Review

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

QMS – The QMS Manual is available on the RFM website. There have had minor changes in 2024 to account for the widening of geographic scope and Standard Version update. A website Document register, and document control sheet has been created in 2024.

<https://rfmcertification.org/wp-content/uploads/2025/02/QMS-V5.2-Oct-2024-Final-with-CA.pdf>

Procedures

The latest versions of RFM Procedures are available on the RFM website. Some procedures were updated in 2024 and some remained unchanged. All were reviewed in 2024.

- Procedure 1: CB Approval for Fishery Standard – Reviewed
<https://rfmcertification.org/wp-content/uploads/2024/10/Procedure-1-V5.2-Oct-2024-Final.pdf>
- Procedure 2: Application to Certification Procedures for Fishery Standard – Reviewed
<https://rfmcertification.org/wp-content/uploads/2024/10/Procedure-2-Oct-2024-Final.pdf>
- Procedure 3: CB Approval for Chain of Custody – Reviewed
<https://rfmcertification.org/wp-content/uploads/2024/10/Procedure-3-V5.2-Oct-2024-Final.pdf>
- Procedure 4: Application to Certification Procedures for Chain of Custody – Reviewed
https://rfmcertification.org/wp-content/uploads/2022/11/Procedure-4-CSC_Final-Nov-2022.pdf
- Procedure 5: RFM Program Administration V5.1 Nov 2022– Reviewed
https://rfmcertification.org/wp-content/uploads/2022/11/Procedure-5-V5.1-Nov-2022_2.pdf
- Procedure 6: RFM Certified Logo Management and Market Surveillance – Reviewed
<https://rfmcertification.org/wp-content/uploads/2024/10/Procedure-6-V5.2-Oct-2024-Final.pdf>
- Procedure 7: Complaints and Appeals- Reviewed
https://rfmcertification.org/wp-content/uploads/2022/11/Procedure-7-V5.1-Nov-2022_2.pdf
- Procedure 8: Appointment and Control of Assessors V1.1 Nov 2022 V5.1 Nov 2022 – Reviewed
https://rfmcertification.org/wp-content/uploads/2022/11/Procedure-8-V5.1-November-2022_2.pdf
- Procedure 9: Extraordinary Events and Remote Assessment V1.1 Nov 2022 – Reviewed
https://rfmcertification.org/wp-content/uploads/2022/11/Procedure-9-V5.1-Nov-2022_2.pdf
- Procedure 10: Standard Development Procedure - Reviewed

- Fishery Scoring Documents
Updated to adjust terminologies for Global Scope
<https://rfmcertification.org/wp-content/uploads/2024/10/RFM-V2.2-Global-Scope-Guidance-FINAL-.pdf>

VIII. Committees within the RFM Program

The Committee Management is facilitated by the RFM Program Manager. Details are maintained as part of this role.

- **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.

Website: Need to change names where people have left a Committee

Eg Tom Pickerel has moved from Global Tuna Alliance to the Pew Foundation

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

IX. 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) is currently being reviewed via the GSSI MOCA audit review. This will be concluded in Q1 2025 and current findings (Feb 2025) show the Program to be in alignment

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 requests 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

- The Management should publish an updated Program of Work for 2025 when this is decided upon.

XIII. Fishery Standard V 2.1

- Fisheries that have been certified are listed on the CSC Website
 - 8 Alaska Fisheries
 - Pacific Whiting
 - Guld of Mexico Shrimp
- Program of Work – FSC to review Fishery Standard
- Certifications are carried out by three CBs
 - GTC/NSF
 - MRAG
 - DNV

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
- Certified Organizations are listed as certified. This includes both single site and multi-site operations

- Certifications are carried out by three CBs
 - GTC/NSF
 - MRAG
 - SCS

XV. Certification Body (CB) Management

Based on 2024 CB reviews the CBs are performing to expectations and RFM Criteria.

Global Trust /NSF – RFM Fishery and Chain of Custody

A 2024 review took place remotely on 28th Nov 2024. The accredited office is Dundalk, Ireland. The CB has certified four fisheries Salmon Recert / Golden King Crab, P.Cod, US Gulf of Mexico Shrimp and of Chain of Custody certifications internationally.

Overall –Zero Non conformances were recorded.
AB is INAB and have completed annual audits.

SCS Global – RFM CoC Only

The SCS accredited office is in Emeryville, California.

The 2024 CBreview took place remotely on 17th October 2024 SCS carry out approximately 22 CoC audits. Most audits are joint MSC/RFM Audits

A number of minor Non-Conformances were raised. The issue behind most NCs was that the CB 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.

Overall – All NCs are closed out. Performance could be improved.
AB is ANSI.

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 2024 review was conducted August 14th 2024.

No Non conformances were raised and the procedures and controls were well maintained
The CB is certifying three fisheries against RFM Standard - Pollock, Sablefish, Halibut

Overall – performance is good
AB is ANSI.

MRAG Americas

The accredited office is St Petersburg, Florida.

MRAGs review was conducted on 24th September 2024. Zero non conformances raised.

The CB has received accreditation via ANSI for Fishery and CoC. Non-conformances raised by the AB have been closed

The CB certifies three fisheries and only a small number of CoCs have been issued.

They hope to expand their activities.

Overall - Quality of documentation was good

XVI. Accreditation Body (AB) Management

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

- Communications
 - INAB – GTC
 - ANSI / ANAB – SCS, MRAG and DNV
- Competency and Training
 - ANAB and INAB updates from RFM via emails
- Review
 - Review is Based on IAF membership

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, Inc.
- 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 2029

- 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 / NSF
- Exp: July 2029

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 no complaints made to RFM about the RFM Program during this period

Future Considerations and Objectives for 2025

The RFM Review team suggest the following Program activities and potential Objectives for 2025

- Maintenance of GSSI Benchmarking Approval
- Review of the CoC report format for CBs to assist with consistency
- Review of procedures given proposed changes to the international structure