

**FAO-BASED
RESPONSIBLE FISHERIES MANAGEMENT
(RFM)**

Chain of Custody Standard

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Principles of the Process

To become certified as meeting the requirements of the Chain of Custody Standard, applicants shall be able to demonstrate compliance with this Standard, through an independent assessment by an approved Certification Body.

The Certification Body shall be approved and be accredited to ISO 17065 (Conformity assessment- Requirements for bodies certifying products, process and services) by an Accreditation Body who is a member of the International Accreditation Forum. EN45011 / ISO/IEC Guide 65:1996 (General Requirements for Bodies Operating Product Certification Systems) shall be utilised until the transition period for ISO 17065 has expired.

The chosen Certification Body will formulate a contract between the applicant and the Certification Body detailing the requirements and commitments needed from the applicant.

The objective of Chain of Custody certification is to provide an assurance to a labeled certified claim on a seafood product that the product originates from a certified 'Responsibly Managed Fishery'.

Where required within the supply chain there will be specific interpretations of the requirements in the Chain of Custody Standard to relate them to specific industry sectors, for example, packing, processing, distribution and selling of seafood products and materials.

Definitions

Chain of Custody (FAO Definition):

The set of measures which is designed to guarantee that the seafood product put on the market and bearing the ecolabel seal is really a product of designated origin and coming from the certified fishery concerned. These measures thus cover both the tracking/traceability of the product all along the processing, distribution and marketing chain, as well as the proper tracking of the documentation and control of the quantity concerned.¹

Applicant: A company or multi-site organisation in the supply chain that has applied to meet the Chain of Custody Standard through the formal application form.

Certified Applicant: An applicant company or multi-site organisation in the supply chain that has been formally certified by the Certification Body as meeting the Chain of Custody Standard.

Certified Fishery: A fishery that has been independently certified as meeting the “FAO-Based Responsible Fisheries Management Standard”.

Chain of Custody Standard: The list of requirements that the applicant shall meet to become certified to the Chain of Custody Standard and /or use the certified claim.

Certified Chain: An applicant company or group of companies in the supply chain that can demonstrate all certified stages back to the Certified Fishery.

Certified Statement: A statement made by a certified applicant approved and licensed for use by the certified fishery representative body.

Ecolabel/Certified Seal: A distinctive logo or statement which certifies that the fish has been sourced from and traceable back to a Certified Fishery.

Identification Number: A Chain of Custody Standard certificate number issued to each certified applicant.

Multi-site Organisation: An organisation that has more than one site under its direct control and applies for certification for these sites. The main processes at each site within the organisation will be substantially the same and will be operating to similar methods and procedures. For example all primary processors/packers in same geographic location, conducting the same operations and sourcing certified seafood from the same fishery.

¹ FAO Guidelines for the Ecolabelling of Fish and Fishery Products from Marine Capture Fisheries, Rome 2005 + 2009

A Multi-site Organization may be considered as such only if it complies with the following criteria. All sites within the organisation:

- Shall have a legal or contractual link with a Central Office of the named and designated co-ordinating organization;
- Shall be subject to a common management system that oversees the traceability operations, which is laid down in a centrally controlled documentation system;
- Shall be subject to continuous surveillance and internal audits by the Central Office of the designated co-ordinating organization.

Single Site: An organisation that has one site that applies for certification under this standard.

Stage: A handling / transfer point in the supply chain e.g. Vessel, Packing, Processing, Distribution, Sales.

Subcontractor: An organisation that is contracted to carry out work under contract for a third party or affiliate (includes contract processors, transportation companies, distribution companies and any other storage or processing facilities).

Outline of the Certification Process

The Chain of Custody Certification Process is managed by the Independent Certification Body

- *Global Trust Certification Ltd.*

The certification process has a number of distinct stages which are described below.

Stage 1. Information Request

Information may be requested by an applicant within the Supply Chain. A potential applicant could be a:

- Vessel Group
- Primary Packer
- Secondary Processor
- Distributor
- Market / Retailer / Restaurant

Applicants may request information from the representative organization or the Certification Body about the certification process, the Standard requirements, the outline costs or timeframes to gain certification.

Applicants are advised to carry out a self-assessment against the standard in order to ascertain their readiness for external assessment.

Stage 2. Completion of Application Form

Applicants will be requested to formally provide information on their product handling details and their product supply chain to the Certification Body, using the Chain of Custody application form.

Single units or Multi site organizations may apply.

When the completed application form is received by the Certification Body the applicant is allocated a unique identification number.

Stage 3. Certification Body prepares an Assessment Plan

Each applicant company and its supply chain is different and therefore the Certification Body will create a relevant assessment plan to validate the Chain of Custody for the applicant's specific product(s) and supply chain.

The applicant will be required to ensure that all relevant companies listed and involved in the handling stages prior to the applicant's stage are encouraged to apply for certification also.

The Certification Body will provide the applicant with an assessment plan and assessment cost based on the information provided in the application form.

When the applicant agrees to the assessment plan, the Certification Body standard conditions, and forwards the relevant payments for associated assessments costs, the application will then move forward for assessment.

Stage 4. The Assessment

The assessment of the applicant's facility is carried out by an independent assessor approved and acting for the Certification Body. The assessment is against the Chain of Custody Standard and in line with the assessment plan.

It is the applicant's responsibility to ensure that the information supplied in the application form is factual and accurate so that the assessment plan remains relevant.

The Certification Body's assessor will carry out the assessment in an independent, professional and courteous manner.

The key components of the Chain of Custody standard include the requirements for:

- A Product Identity System;
- A Traceability System;
- A Segregation System.

The Chain of Custody Standard will require specific interpretations of the clauses by the assessor to ensure they relate accurately to different sectors including packing, processing, distribution and selling of seafood products and materials.

Stage 5. The Assessment Report

During the assessment the assessor will compile an assessment report describing how the applicant does/does not meet the Chain of Custody Standard.

The assessment report will identify any non-conformities against the Chain of Custody Standard. Applicants will be required to close out non-conformities through corrective actions.

Stage 6. The Certification Decision

The applicant's assessment report and any necessary corrective actions will be submitted to a certification committee for a certification decision.

The certification committee is composed of persons with equal competence to the assessor and with expertise in certification.

Stage 7. Certification

Where certification is the outcome, applicants shall be notified within 10 days of the certification decision. Following this notification a Certificate of Approval will be issued to the applicant.

The certificate remains the property of the Certification Body and the control and management of the status of a Certificate shall be in place.

Certificates are valid for three years with annual surveillance.

On-going certification is maintained where there is substantive and demonstrable evidence that the applicant remains in compliance with the criteria of the Standard. Any non-conformity raised shall be verified as closed, with objective evidence within defined timescales.

The applicant will be awarded certification for its facility if it meets the Chain of Custody Standard.

Each of the applicant's relevant products at their facility and each prior handling stage in the supply chain identified in the applicant's application form will be required to be assessed against the Chain of Custody Standard by the Certification Body before full Chain of Custody Certification is awarded.

Stage 8. Access to Certified Seal/Statement

Certified applicants can apply to certified fishery representative body the for use of the certified seal/statement.

Only certified applicants who can demonstrate full Chain of Custody certification back to the fishery can apply to the certified fishery representative body to use the certification seal / statement.

Appeals

The applicant has the right to appeal the certification decision of the Certification Body. Appeals shall be made in writing within seven days of the certification decision.

A full response will be given by a Certification Body manager independent of the assessor and certification committee.

Chain of Custody Standard Requirements

This Standard details the set of requirements that shall be certified as being in place to ensure that the seafood product put on the market and bearing the ecolabel seal is really a product of designated origin and coming from the certified fishery concerned. These measures thus cover both the tracking/traceability of the product all along the processing, distribution and marketing chain, as well as the proper tracking of the documentation and control of the quantity concerned.²

1.0 General Principles of Traceability for Chain of Custody

- 1.1 The applicant shall have a documented policy to state that it is committed to the Chain of Custody Standard.
- 1.2 Only Seafood products that originate from a certified responsibly managed fishery shall carry the official certified seal/statement.
- 1.3 All Seafood products carrying the official certified seal/statement shall be readily identifiable and where necessary kept clearly separated from products sourced from non-certified fisheries at all times.
- 1.4 Traceability systems shall be in operation that can identify and trace certified labeled seafood products back to the certified incoming product and to the certified fishery.
- 1.5 Approved and authorized identification coding shall be in place in the applicant's facility to enable effective product identification.
- 1.6 The applicant shall demonstrate compliance with the applicable national/federal and/or regional/state regulations on labeling and traceability.
- 1.7 Where certified labeled product and non-certified product are either,
 - a) transported together to and from the site or
 - b) in third party storagethe applicant shall have a system in operation to ensure appropriate segregation is provided.
- 1.8 Where an applicant utilises the services of a subcontractor, the subcontractor shall be;
 - certified to this Chain of Custody Standard,
 - have a signed contractual agreement in force.
- 1.9 Where an applicant utilises the services of a third party transport companies a contact shall be in place, however it is not necessary for the transport companies to hold certification to this Chain of Custody Standard

² FAO Guidelines for the Ecolabelling of Fish and Fishery Products from Marine Capture Fisheries, Rome 2005 +2009

2.0 Traceability within the Supply Chain

- 2.1 Each seafood consignment shall be traceable back to the certified fishery and should have the following minimum information available:
- Species name
 - Catch area
- 2.2 Certified incoming products shall be kept separate from non-certified incoming products throughout seafood processing, distribution and marketing if they are to carry the official certified seal/statement. This may be achieved by:
- Physical separation;
 - Temporal separation.
- 2.3 Where certified and non-certified seafood inputs are mixed they are not eligible for carrying the official certified seal/statement.
- 2.4 When an applicant sells/markets any product or batch of products as originating from a certified fishery the applicant shall operate a system that verifies through documentation the traceability of the product.
- 2.5 The applicant shall have a documented product retrieval/recall procedure in operation which includes the requirement that the Certification Body that shall be notified in the event of a certified product being retrieved.
- 2.6 The product retrieval system shall be:
- activated if non-conforming product is released into the supply chain;
 - tested annually with documented results retained for inspection.

3.0 Traceability and Labelling

- 3.1 The applicant shall test the traceability system across the range of FAO Chain of Custody certified products to ensure traceability can be determined from incoming product to finished product and vice versa. This shall:
- be carried out at least annually;
 - include a quantity check/mass balance;
 - be documented and the results shall be retained for inspection.
- 3.2 Documentation shall be available that verifies the identity of the certified seafood as originating from a certified fishery.
- 3.3 Certified seafood products shall be labeled or otherwise be identified in a manner that ensures traceability is maintained during packaging, storage, handling and delivery.
- 3.4 The applicant shall be able to track and trace the certified product one step forward and back to the certified fishery.
- 3.5 Each certified product shall be labeled with all necessary information which is appropriate for the applicant's stage in the supply chain. As a guide, this may include the following, although this is not an exhaustive list:
- Commercial species name;
 - Country of origin;
 - Fishing/catch area;
 - Product description;
 - Product code or production code number.
- 3.6 During storage and transportation of certified seafood product each unit shall have its identification number indicated on the attached label or documentation.
- 3.7 The applicant shall operate a secure system for the production, storage and application of product labels bearing the certified seal/statement, to ensure only certified product is labeled as such.
- 3.8 A record of all certified incoming product shall be maintained, showing the name of the supplier, the suppliers unique identification number, evidence of the supplier's Chain of Custody certificate validity, and sufficient other details to allow the tracing of the incoming product back to the supplier and the certified fishery.
- 3.9 All traceability records shall be kept for a reasonable period to correspond with the shelf life of the product, with a minimum of 3 years. Traceability records shall be accurate, legible and unadulterated.

- 3.10 The applicant shall have a documented procedure for handling non-conformities to this standard. Records of non-conformities shall include:
- Clearly documented details of the non-conformity;
 - Identification of the person responsible for addressing non-conformity;
 - Clearly documented corrective action;
 - Documented time-scale for correction;
 - Documented verification that the corrective action has been implemented and the non-conformity closed.
- 3.11 Corrective actions plans shall be accurately documented; identifying authorized responsible personnel and with specified time limits to complete the plan.
- 3.12 The applicant should keep a documented record of customer complaints or feedback concerning the labeled certified product.

Multi-Site Chain of Custody Standard Requirements

This section details the set of requirements that shall be certified as being in place where the applicant is a multi-site organisation; these requirements apply to the designated central office.

Organisational Integrity

- 1.0 The multi-site organisation shall either be:
 - a legal entity with direct control over the sites and that takes ownership of the certified product or
 - have a signed contractual agreement between the central office and each member site that is included in the application.
- 2.0 There shall be a documented a company policy stating the organisation's commitment to the Chain of Custody Standard.
- 2.1 There shall be documented evidence to demonstrate that this policy has been communicated to all the Chain of Custody member sites within the multi-site organisation.
- 3.0 There shall be a documented organisational structure showing relevant positions, and their interrelationship/ responsibilities with respect to the Chain of Custody standard.
- 3.1 There shall be a designated appropriately trained person within the organisation who is accountable and responsible for co-ordinating multi-site chain of custody activities to ensure they meet the requirements of the Chain of Custody standard.
- 4.0 Where a multi-site organisation utilises the services of a third party subcontractor, the subcontractor shall be;
 - certified to this Chain of Custody Standard,
 - have a signed contractual agreement in force.
- 4.1 Where a multi-site organisation utilises the services of a third party transport companies a contact shall be in place, however it is not necessary for the transport companies to hold certification to this Chain of Custody Standard.

Management of Members

- 5.0 The multi-site organisation shall have a register of all sites included under its control/contractual agreement which details:
- Name of Each Site;
 - Full Address (physical and postal);
 - Contact details (phone/email);
 - Product Handled;
 - Date of last Internal Audit and Result.
- 5.1 The Certification Body shall be formally informed of the addition of any new sites to the multi-site organisation within 10 working days of registration.
- 5.1.1 The new additional site shall have received an internal audit to the Chain of Custody standard and there shall be no outstanding non-conformances before the site is added to the member site register.
- 5.2 The Certification Body shall be formally notified of the removal of any site from the member site register within 10 working days of withdrawal.

Central Office Control

- 6.0 The central office shall demonstrate its ability to collect and analyze data from all member sites including itself. There shall be a documented annual management review meeting covering:
- System documentation and system changes;
 - Review of multi-site organisations compliance to the standard
 - Complaints;
 - Evaluation of corrective actions;
 - Internal audit planning and evaluation of the results;
 - Different legal requirements.
- 7.0 The applicant shall have a documented procedure for handling non-conformities to this standard. Records of non-conformances shall include:
- Clearly documented details of the non-conformity;
 - Identification of the responsible person assessing non-conformity;
 - Clearly documented corrective action;
 - Documented time-scale for correction;
 - Documented verification that the corrective action has been implemented and the non-conformity closed.
- 7.1 Corrective actions plans shall be accurately documented; identifying authorized responsible personnel and with specified time limits to complete the plan.
- 8.0 There shall be an internal audit plan, checklist and schedule available to cover the central office and member sites.
- 8.1 Internal audits of the member site and central office shall be carried out at least annually and prior to application for multi-site certification.

- 8.2 Internal auditors shall be suitably trained and independent of the area being audited.
- 8.3 All records of the internal audit plan, audit findings and follow up of corrective actions resulting from an internal audit shall be maintained and available.
- 9.0 There shall be a documented procedure for the identification of certified products and to enable traceability of all certified product to the applicable sites.
- 9.1 There shall be evidence that a documented mass balance exercise across the multi-site organisation has been carried out by the central office at least annually and prior to application.
- 10.0 Records relevant to the Chain of Custody standard shall be retained for a minimum period of 3 years.