



Quality Management System (QMS)

Responsible Fisheries Management (RFM) Certification Program
17065



Quality Management System, RFM Version 5

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1. INTRODUCTION

1.1 This manual details the Quality Management System (QMS) for the Responsible Fisheries Management (RFM) Certification Program. This manual outlines the Policies and Controls for the auditing, evaluating, certifying, and accrediting processes of the RFM Certification Program.

1.2 This RFM Certification Program is owned and managed by the Certified Seafood Collaborative (CSC) Foundation. The structure of the operating, certification, and control procedures is described herein.

1.3 RFM Standards

The RFM Certification Program maintains the following two standards (RFM Standards):

- a) RFM Fishery Standard, which defines the process and fishery management requirements of responsible fishery management of the RFM Certification Program and;
- b) RFM Chain of Custody Standard, which defines the process and traceability requirements for certified products throughout the market chain.

The current RFM Standards and the Quality Management System (QMS) procedures are available on the RFM website.¹

1.4 The CSC makes information about the Program's governance structure, ownership, standards and standard-setting procedures, and the composition, operating procedures, and responsibilities of its governance bodies, freely and publicly available. This information may be found on the RFM website at www.alaskaseafood.org/rfm-certification/.

2. RFM POLICY STATEMENTS

2.1 General RFM Policy Statement

The purpose of the RFM Program is to provide the seafood supply chain fishing industry with a Certification of Responsible Fisheries Management at the highest level of market acceptance. Certification to requirements under the RFM Program will demonstrate to customers and consumer's fisheries management is conducted in accordance with internationally agreed standards and guidance of the United Nations Food & Agriculture Organization.

¹ <http://www.alaskaseafood.org/rfm-certification/about-rfm/quality-management/>

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The RFM Program is founded on a commitment by seafood stakeholders in Alaska to support responsible fisheries management and certification for Alaska seafood that meets customer and market expectations and ISO accreditation standards.

2.2 Key Performance Indicators for RFM

The RFM Certification Program is committed to provide and facilitate cost effective, practical, and responsible certification standards and services, by which both large and small businesses can supply the marketplace with certified products.

The RFM Certification Program is committed to the following objectives:

- a) To be recognized as a leader in Responsible Fisheries Management certification;
- b) To facilitate and maintain the RFM Standards Program under ISO 17065 accreditation;
- c) To facilitate and maintain GSSI benchmark approval for the RFM Certification Program;
- d) To provide open, effective communication with seafood customers, interested parties, and committees;
- e) To provide systematic validation and control of RFM quality processes; and
- f) To provide a system for assessing fisheries that voluntarily submit to certification, through positive engagement with the key bodies responsible for fisheries management, research, trade and industry, and the environment.

2.4 Management and Control

The RFM Certification Program has established, and will maintain, an independent effective certification assessment system based on ISO 17065, to ensure that the Certification Bodies operate in a consistent and controlled manner and so that participants manage their businesses and market their products in full conformity with the criteria defined in the RFM Standards.

In support of its policies and through this Quality Management System and supporting procedures, the RFM Program has established and will maintain a system of documentation and control procedures, coupled with regular reviews, to ensure that it facilitates an efficient and cost effective certification service to the industry it serves.

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3. PROGRAM STATUS, STRUCTURE AND FINANCES

3.1 History

In 2010, The Alaska Seafood Marketing Institute (ASMI) created the Alaska RFM Program in response to market requests for a high integrity, ISO model for the certification of Responsible Fisheries Management (RFM) based on UN FAO Fisheries Management models and guidance documents.

The RFM Program is an independent, third party certification of 'Responsible Fisheries Management' according to the UN FAO Code of Conduct for Responsible Fisheries 1995 and the UN FAO Eco-labelling Guidelines 2005 and 2009. These FAO documents are available from the FAO website.²

The RFM Certification Program uses two RFM Program Standards:

1. RFM Fishery Standard and;
2. RFM Chain of Custody Standard.

On July 1, 2020, the Certified Seafood Collaborative (CSC), a 501c3 non-profit foundation led by a diverse board of seafood and sustainability industry experts, became the owner of the Responsible Fisheries Management (RFM) Certification program, a third-party sustainable seafood certification program for wild capture fisheries. The Alaska Seafood Marketing Institute officially handed over ownership after a six-month period of transition following over ten years of dedication to developing the robust and independent certification for the industry. The transfer of RFM to the CSC presents new opportunity for cost savings, increased efficiencies and growth outside of Alaska fisheries.

The CSC relies on the Alaska Fisheries Standard Committee (formerly the Conformance Criteria Committee) to develop and maintain the RFM Fishery Standard and the RFM Technical Committee to develop and maintain the RFM Chain of Custody Standard. Current and historical members of these committees are identified on the ASMI website.³

The latest RFM Fishery Standard V2 was recommended by the Fisheries Standard Committee in 2016 and approved by the ASMI Board in early 2017, and is directly derived from the FAO documents referenced.

As part of the FAO-based concept of the RFM Standard, the Alaska RFM Fishery Standard V2 will be reviewed every 5 years and, where relevant and appropriate; the standard will be updated, in consideration of changes to FAO key reference documents.

The latest RFM Chain of Custody Standard V 2.4 was recommended by the Technical Committee in October 2015 and approved by the ASMI Board in November 2015, and has been developed from the FAO Based RFM Chain of Custody Standard V 2.3.

2<http://www.fao.org/docrep/005/v9878e/v9878e00.HTM>.

3 <http://www.alaskaseafood.org/rfm-certification/about-rfm/advisory-committees/>

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3.2 Program Development

In June 2015, ASMI formally reviewed the RFM Program as part of its commitment to continuous program improvement, and as a result, ASMI published a Program Improvement Plan (Procedure 5, RFM Program of Work).

ASMI opened a formal 60-day Public Comment Period for the RFM Standards and Scoring Guidance commencing in July-August 2016. Comments were submitted by interested parties for review and consideration by the RFM Fisheries Standard Committee.

The CSC keeps on file for a period of at least one full standards revision the following records related to each standard development or revision process:

- a) Policies and procedures guiding the standard-setting activity;
- b) Lists of stakeholders contacted;
- c) Interested parties participating in each stage of the process;
- d) Comments received and a synopsis of responses to those comments;
and
- e) All draft and final versions of the standard.

3.3 Program Governance Structure and Involved Parties

The FAO Guidance requires the governance structure of certification schemes to be transparent, credible and robust, and to have clear written rules and procedures for decision-making processes and scheme oversight.

The CSC Foundation Board is the RFM Program owner and the approving body for all standards, strategy and policy related to the RFM Program. Three advisory committees make policy and work product recommendations to the ASMI Board for approval:

- 1) The CSC Foundation Board, which makes RFM Program policy and strategy decisions.
- 2) The Fisheries Standard Committee which oversees the development and ongoing review of the RFM Fishery Standard
- 3) The CSC Technical Committee, which oversees the ongoing review and development of the RFM Chain of Custody Standard.

The TOR of the Board relevant to the RFM Certification Program are available on the RFM website, as well as the below is a summary of the Governance for RFM.

Quality Management System CSC Foundation Board

The CSC is a 501c3 non-profit foundation with a diverse board of seafood and sustainability experts. As owner of the RFM Certification program, the CSC Foundation Board is the approving body for all RFM Certification standards, strategy, and policies related to the RFM Program. The RFM Certification program is a voluntary and internationally accredited assessment of whether a fishery meets strict criteria to be certified as meeting “Responsible Fisheries Management”. It is a comprehensive program founded on the strongest and most widely acknowledged international standards and practices.

The CSC Board established two key advisory bodies for the RFM program.

3.3.1 RFM Standards Committees

The RFM Standards Committees (Fisheries Standard Committee and Technical Committee) and their chairs are appointed by the CSC Foundation Board and may be nominated by the CSC Board, other members of the respective committee, or any member of the public. Each RFM Standards Committee can have up to nine members. Members represent a broad range of interests and may include experts from state and federal management agencies, scientific and academic institutions, NGOs, and the seafood industry

The RFM Standards Committees provide technical expertise, advice, recommendations, and guidance on the RFM Program Standards, structure, criteria, and operation, as charged by the Foundation Board. The RFM Standards Committees are responsible for the development of RFM Standards as follows:

- It is the principal role of the Fisheries Standard Committee to make recommendations to the Foundation Board to revise/update the RFM Fishery Standard as necessary, based on expertise, external comments, and new legislation and guidance, to maintain consistency of the RFM Fishery Standard with the applicable FAO fishery management model and guidance documents.
- It is the principal role of the Technical Committee to make recommendations to the Foundation Board to revise/update the RFM Chain of Custody Standard as necessary, based on expertise, external comments, and new legislation and guidance, to maintain consistency of the RFM Chain of Custody Standard with the applicable FAO chain of custody model and guidance documents.

The RFM Standards Committees review and respond to all relevant comments received during open comment periods on the RFM Standards as defined by their TOR and the Standards Revision Process. RFM Standards Committees strive for decisions by consensus

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but operate by a two-thirds vote when consensus is not attainable.

The RFM Standards Committees can create subcommittees to manage the review and suggested edits of the RFM Standards.

Decisions of the Committees are advisory and are submitted to the Foundation Board for approval.

RFM Standards are maintained in an auditable and practical format. RFM Standards are subject to the Foundation Board's approval, after open public comment and recommendation of the Fisheries Standard Committee. Once approved by the Foundation Board, RFM Standards are delivered to relevant accreditation boards for accreditation conformance review.

3.3.2 ASMI RFM Team

The RFM Team, which is made up of ASMI staff and contracted experts, provide administrative support to the RFM Program and facilitates:

- Implementation of the policies, procedures and controls of the RFM Program as approved by the Foundation Board, and
- Meetings of the Foundation Board, Fisheries Standard Committee, and the Technical Committee, and the communication of the recommendations of these committees to the Foundation Board for consideration.

CSC engages experts in certification, accreditation, and fisheries management to assist with RFM Program management. These contract experts report to the Program Manager. The RFM Team is responsible for maintenance of the Quality Management System and for facilitating the technical and operational requests of the Foundation Board and RFM Committees and facilitating the technical and training needs of Certification Bodies, Accreditation Bodies, Applicants and Clients.

ASMI RFM Team will notify Certification Bodies, Accreditation Boards, Applicants, and Clients of any change in management procedures, which affects program rules and procedures for accreditation or certification.

The ASMI RFM Team facilitates the RFM Procedures and Controls, which Certification Bodies must follow:

- Liaises with Certification Bodies on any operational queries;

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- Coordinates the required reviews under the program, including the annual internal review and reviews of the RFM Standards, and publishes the proposed 'RFM Program of Work.'
- Oversees the initial and continuing approval of Certification Bodies seeking to operate within the RFM Program;
- Oversees periodic surveillance and monitoring of fisheries and chains of custody certified under the RFM Program;
- Oversees Assessor training and competence assessments (see Chapter 6 below);
- Maintains a list of certified enterprises for chain of custody that is made publicly available via RFM website; and
- Ensures the performance of Certification Body requirements defined in Chapter 6 below.

Further details of key roles are available on the RFM Website at www.alaskaseafood.org/rfm-certification.

3.3.3 Certification Bodies

Certification Bodies are approved, independent entities engaged in assessing and certifying that RFM Fishery and Chain of Custody Applicants satisfy the applicable RFM Standards. The RFM Program is open to ISO accredited Certification Bodies that wish to seek formal approval to become active in the RFM Program. The CSC facilitates training to educate Certification Bodies in the details of the Program. The CSC stipulates the procedure and requirements for Certification Bodies to receive initial approval and the ongoing requirements for review and maintaining that approval. The Certification Bodies approved by ASMI must be expert in seafood certification and, accredited to ISO 17065. Certification Bodies may be approved for the RFM Fishery Standard, RFM Chain of Custody Standard, or both.

A Certification Body will appoint Assessors, meeting the qualifications specified in RFM Procedures, to perform assessments and surveillance audits required for certification under the RFM Program. The procedure for Certification Body approval and details of the assessment and certification procedures are defined by RFM Procedures, which are available on the RFM website.

Contracts for assessment and certification are between the Applicant and the Certification Body and specify levels of service that Certification Bodies will provide to their clients.

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3.3.4 Accreditation Bodies

Accreditation Bodies are formal, recognized accreditation entities that are members of the International Accreditation Forum engaged in assessing and accrediting Certification Bodies to the ISO 17065 criteria.

The RFM Team liaises with the Accreditation Bodies to ensure consistent interpretation and training on the RFM Standards and process.

The contracts for accreditation are between the Certification Body and the Accreditation Board.

3.3.5 Fishery Applicants and Clients

Fishery Applicants are organizations representing all the relevant parties in a fishery applying for RFM assessment and certification to the RFM Fishery Management Standard.

The Fishery Applicant acts as a facilitator for all parties during the application and assessment. The Fishery Applicant engages directly with approved Certification Bodies.

Upon approval of a fishery for certification, the applicable Fishery Applicant becomes a Fishery Client.

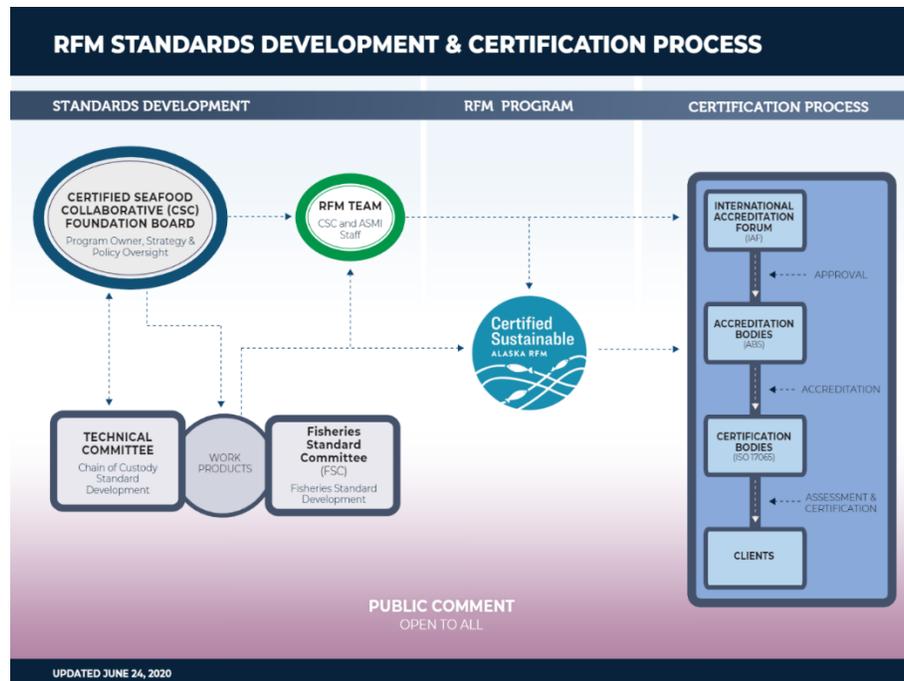
3.3.6 Chain of Custody Applicants

Chain of Custody Applicants are companies applying for RFM assessment and certification to the Chain of Custody Standard used to verify that fish are sourced from a fishery meeting the RFM Fishery Standard. The Chain of Custody Applicant engages directly with the Certification Body.

Chain of Custody Applicants are permitted to represent products from an RFM Certified Fishery and handled in compliance with the requirements of the Chain of Custody certification as RFM Certified Products.

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3.4 Transparency of Financial Relationships between RFM Bodies



3.4.1 Certification Bodies

Certification Bodies are separate legal entities from the CSC, Fishery Applicants, and Chain of Custody Applicants and derive income from the assessment of fisheries and supply chain organizations.

3.4.2 Accreditation Bodies

Accreditation Bodies are separate legal entities from the CSC and all other RFM parties and derive income from the accreditation of Certification Bodies.

3.4.3 RFM Fisheries Standard and Technical Committees

RFM Fisheries Standard Committee and Technical Committee members are individuals with no legal employment or financial ties to the CSC.

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or to fisheries participating in the RFM program, but are entitled to per diem and travel expenses incurred for Committee obligations.

3.4.4 Fishery and Chain of Custody Applicants

Fishery and Chain of Custody Applicants and Clients are separate legal entities independent from the CSC, Certification Bodies, and Accreditation Bodies and pay for the costs of assessment directly to Certification Bodies.

4. ORGANIZATION OF 'ASSESSMENT' AND 'CERTIFICATION' ACTIVITIES

4.1 Certification

4.1.1 Certification Bodies are required to maintain a written fee structure that is available on request and is adequate to support accurate and truthful assessments commensurate with the scale, size, and complexity of the fishery or chain of custody.

4.1.2 The validity of a fishery certification shall not exceed five years unless an extension is granted for cause.

4.1.3 Certification Bodies are required to carry out periodic surveillance and monitoring at sufficiently close intervals to verify that certified fisheries continue to comply with the certification requirements.

4.1.4 Certification Bodies shall apply a consistent methodology to assess compliance with the standard.

4.1.5 Certification Bodies shall have consistent, documented procedures that specify the conditions under which certification may be suspended or withdrawn, partially or in total, for all or part of the scope of certification.

4.1.6 Certification Bodies shall have certification procedures and guidance for multi-site certifications.

4.1.7 Certification Bodies shall use consistent formats for assessment and audit reports and reporting.

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4.1.8 Certification Bodies shall have in place consistent procedures to solicit stakeholder's input during fishery assessments, reassessments, and surveillance audits. Under a full assessment only, once the Assessment Team is in place, the Certification Bodies will announce the commencement of the process and request all interested parties register as stakeholders. Certification Bodies will request the following information when registering stakeholders - name and contact details; association with the fishery; and issues stakeholders would like to discuss. Registered stakeholders will be consulted during the assessment within a target 30-day period.

4.1.9 Certification Bodies shall make a draft of the full assessment report (excluding commercially sensitive information) publicly available for comment, prior to the certification decision. Following a draft report publication, there will be a 30-day comment period open to registered stakeholders and the public. Certification Bodies shall provide a complete and comprehensive response to comments.

4.1.10 Certification Bodies shall use a consistent procedure for determining non-conformances, verifying corrective actions arising from non-conformances, and appeal of non-conformances.

4.1.11 The scope of the full assessment or reassessment shall include, when necessary, a site visit or site visits, as appropriate.

4.1.12 Certification Bodies shall make summary fishery management audit reports (excluding commercially sensitive information) available on the ASMI website and on request after certification has been granted.

4.1.13 Certification Bodies shall have a continuing professional development program in current best practices for fishery management for Assessors, if applicable.

4.1.14 A fishery may be certified only if any non-conformances are minor and pertain to non-critical issues. For any certification of a fishery with non-conformances, Certification Bodies must specify:

- a) A timeline for closing out corrective actions; and
- b) A system to verify that corrective actions have been satisfied.

4.1.15 If a fishery or supply chain organization is certified to an earlier version of these standards their current certificates will be valid until they are fully re-assessed. At this full reassessment stage, the fishery or supply chain organization is treated like a new application and will be asked to re-apply for certification to the latest approved version of the relevant RFM standard.

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4.2 Assessor

4.2.1 Certification Body Assessors are required to have successfully completed training in the RFM Program.

4.2.2 Certification Bodies shall include the following, where applicable, in their competence assessment of auditors:

- a) An assessment of knowledge and skills for each fundamental area of each assessor's expected work;
- b) An assessment of knowledge of the pertinent fishery and the ability to assess compliance with relevant laws and regulations;
- c) An assessment of knowledge of pertinent supply chain traceability and verification systems
- d) An assessment of each assessor's ability to perform all necessary aspects of the complete the assessment

All Fishery Assessors will undergo a period of supervised training on the RFM Program as set out in Procedure 2, which shall be documented by the attestation of the satisfactory completion of the training program by the appointed competent supervisor.

4.3 Chain of Custody

4.3.1 For a product to be sold as certified or to be destined for retail sale as a certified, labelled product the product must be identified and segregated from non-certified products at all stages of the supply chain under the procedures and to the extent specified by the RFM Chain of Custody Standard

All enterprises that physically handle certified products must be certified and undergo a Chain of Custody audit by an accredited Certification Body, except that no audit is required for storage and distribution of tamper-proof, packaged products.

4.3.2 A Certification Body will verify that a certified enterprise in the chain of custody maintains accurate and accessible records that allow any certified product or batch of products handled by that enterprise to be traceable from point of sale to the buyer.

4.3.3 Any certified enterprise must demonstrate that all Chain of Custody requirements are met by the enterprise's subcontractors.

4.3.4 Certification Bodies shall document procedures for methods and frequency of audits that meet the following requirements:

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Chain of Custody Certificate validity does not exceed three years;

- a) Periodicity of recertification and audits shall be prescribed based on risk factors; and
- b) Changes to an enterprise's traceability system that are deemed to affect the integrity of the Chain of Custody result in an onsite re-audit.

4.3.5 Certification Bodies shall record all identified breaches of the chain of custody, including:

- a) An explanation of the factors that allowed the breach to occur;
- b) An explanation of the corrective actions required to ensure that a similar breach does not re-occur;
- c) The time frames for the corrective actions to be completed; and
- d) On completion of corrective actions, the date of closing out of those corrective actions and the means by which problems were solved.

4.3.6 A Certification Body's Assessment and Audit reports shall include:

- a) The date of the inspection/audit;
- b) The names of all persons responsible for the audit and report;
- c) The names and addresses of the sites inspected/audited;
- d) The scope of the inspection/audit;
- e) Any non-conformities identified;
- f) The results of at least one mass balance assessment for each product covered by the Chain of Custody audit; and
- g) A conclusion on the conformity of the Client with the Chain of Custody requirements.

4.3.7 Certification Bodies shall deliver assessment and audit reports to ASMI, which will then be made available to the public and interested stakeholders upon request.

4.3.8 A certified enterprise shall keep records that demonstrate conformity with the Chain of Custody requirements for a period that:

- a) Exceeds the shelf life of the certified product; and
- b) Exceeds the period between audits.

4.3.9 For Chain of Custody certification of multiple sites managed under the control of a single entity, specific procedures to verify compliance with Chain of Custody requirements will be used to establish that all sites comply with the Chain of Custody certification requirements. Control can include direct ownership, franchises, or sites managed under agreement or contract.

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4.3.10 The Program is open to new Certification Bodies meeting the requirements specified in Procedure 1 for Fishery Certification Bodies or Procedure 3 for Chain of Custody Certification Bodies. Certification Bodies are approved after a successful formal application to the Executive Director, or designee. A Certification Body's role is to assess and audit fisheries based on the relevant RFM Standard to determine the issuance, maintenance or withdrawal of Certificates of Approval under that RFM Standard.

4.3.11 Certification Bodies shall be approved by ASMI on the basis of experience in the categories of:

- a) Practical (Working) Knowledge;
- b) Standards Knowledge;
- c) Auditing Knowledge; and
- d) ISO 17065 accreditation.

4.3.12 The service provided by each Certification Body employed is subject to an agreement that sets out the arrangements for the provision of the service and includes requirements for the information and data arising from the provision of the service to be retained in confidence. The ASMI RFM Team maintains a copy of the agreement with each Certification Body, which are available for examination, upon request

4.3.13 To issue certificates under the RFM Program, a Certification Body must be accredited to ISO 17065 and agree to conform to RFM Procedures and Regulations.

4.3.14 The Certification Body must be capable of complying with RFM Program Regulations, which clearly set out:

- a) The procedure for progressing applications to certification decision;
- b) The assessment procedure and frequency of assessments;
- c) The certification procedures; and
- d) The Rules Governing Certification.

4.3.15 ASMI has defined the qualifications and competence criteria required for Assessors and Assessment Teams employed by Certification Bodies in Procedures 2 and 4. Only Assessors selected, appointed, and controlled by approved Certification Bodies may carry out assessment and auditing activities.

4.3.16 All Assessors are required to follow the assessment and audit procedures and will be subject to regular performance reviews while carrying out work under the Alaska RFM Program.

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4.4 Assessment/Pre-Assessment

4.4.1 The pre-assessment process is voluntary. The process provides for an opening discussion or correspondence during which the assessment procedure is explained, any queries about the criteria defined in the RFM Standards are answered, and arrangements are made for the appropriate Applicant staff to be available during assessment.

The purpose of this pre -assessment process is to determine by telephone discussion, correspondence, or in-person meeting whether the Applicant has the capability and resources to operate in conformity with the criteria defined in the relevant RFM Program Standard, and to identify any shortcomings that may have to be corrected before the application can be progressed and, where appropriate, to provide the Certification Body with sufficient information to provide a quote for the cost of assessment and certification.

The Certification Body will maintain a record of the pre-assessment. For initial Fishery Applicants there may be a more detailed Application Validation Phase.

4.4.2 Certification Body Assessments (Overview)

The assessment program provides for the following:

- a) In the case of a Fishery Assessment, a scientific assessment of the operational management of the fishery;
- b) In the case of a Chain of Custody Assessment, a detailed assessment of the traceability capability, product handling, identification, product identity preservation and segregation (where necessary) and control of use of the Certified Sustainable Alaska RFM logo on certified fishery products entering the supply chain; and
- c) An examination of relevant records and the system for maintaining them.

Details of the full procedure for both fishery and chain of custody assessments can be found in the procedures section.

The Certification Body will identify any observed non-compliance with the criteria defined in the relevant Program Standards and record the non-compliance on a report form.

On completion of an assessment, the Certification Body will present its findings to the client and discuss any non-compliance and indicate timescales for submission of a corrective action program.

The Certification Body will complete a report on the assessment. For initial Fishery Assessments this report will undergo a peer review and a

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public review. The Certification Body's Program Administrator will submit any final report for consideration by the appropriate Certification Committee.

If the application is approved by the Certification Body Certification Committee:

- a) The Applicant will be informed in writing;
- b) The Applicant's details and certified products will be entered in the relevant Certification Body Register of Clients and a Certification Body Certificate of Approval will be issued;
- c) Any Certification Body fishery assessment report will be made publicly available. All Chain of Custody reports and all the relevant correspondences will be filed for future reference.

If certification is not granted by a Certification Body, that Certification Body will:

- a) Communicate to the Applicant, in writing, the reason for withholding that certification, which will identify areas of non-compliance, request corrective actions, and specify the timeline for addressing the non-compliance.
- b) Verify corrective actions before the Application is given further consideration; and
- c) File its assessment report and all relevant correspondence with the CSC.

Should the applicant wish to appeal against the withholding of a Certificate of Approval, the appeal will be heard in the manner described in Procedure 7.

4.4.3 Certificate of Approval

A Certification Body Certificate of Approval granted to a client is valid from the date of issue, subject to continuing satisfactory performance as assessed at the frequency specified by the Certification Body in accordance with the Fishery Management or Chain of Custody Standard requirements, as applicable.

The Certification Body Certificate will state as a minimum:

- a) The Certificate number applicable to the production establishment;
- b) The name of the key organization and any associated organizations;
- c) Certification Standard details; and
- d) The date of issue of the Certificate.

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4.4.4 Surveillance Audits

It is a condition of granting a Certificate of Approval (either for the Fishery Standard or the Chain of Custody Standard) that a surveillance audit shall be carried out at least annually to ensure that the criteria defined in the relevant RFM Standard are being met and maintained.

The program for surveillance audits provides for:

- a) In the case of COC audits, an assessment of the traceability capability, product handling, identification, product identity preservation and segregation (where necessary) as prescribed within the relevant Chain of Custody Standard.
- b) In the case of fishery audits, an assessment of the of the fishery with the RFM Fishery Standard and progress with non-conformances and agreed action plans, changes in the management regime and processes that may affect the outcome of certification, changes to the organizational responsibility of the main management agencies that form part of the fishery management framework, new information on the status of stocks from recent surveys and assessments, significant changes in the ecosystem effects of the fishery (e.g., bycatch, discards, ETP species interactions, gear habitat interactions), violations and enforcement information, and other information that may affect the outcome of certification.
- c) In all cases an examination of relevant records and the system for maintaining them.

During the course of a surveillance audit the Certification Bodies will check that corrective actions have been taken on all non-compliance reports as specified by a Corrective Action Plan. The Certification Body will also identify any other observed non-compliance and record them on a report form and include on a Corrective Action Plan, if they remain outstanding. The Certification Bodies will sign this form and obtain the signature of the Applicant or its representative. If the Client has requested an extension of scope of certification, the Certification Bodies will include an assessment of the new scope within the surveillance audit visit.

On completion of the surveillance audit, Certification Bodies will discuss their findings with the Client or its representative and agree upon each non-compliance and the corrective action.

The Assessor will complete a report on the surveillance audit. A copy of the report will be forwarded to the Certification Bodies and Clients. The report will be reviewed, following which:

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- a) The Client will be notified in writing of the outcome of the review with reference made to any matters requiring corrective action; and
- b) The report, together with all relevant correspondence, will be filed for reference.

The procedure for the review of audit reports is detailed in the Procedures section of this manual, specifically in Procedure 2 (Application to Certification for RFM Fishery Management Standard) and Procedure 4 (Application to Certification for RFM Chain of Custody)

4.4.5 Certified Sustainable RFM Logo Management

Clients and associated organizations listed on valid RFM Certificate of Approval may be authorized to use a Certified Sustainable RFM logo (shown below) by the RFM Team following the signing of a 'Certified Logo Agreement', which clearly defines permitted use of the logo. The Certified Sustainable RFM logo is the mark of conformity to the requirements of the RFM Program and its use is regulated through the Chain of Custody and Logo Management Procedures.



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only in association with the business names shown on the Certificate of Approval or the brand mark of those businesses.

4.4.6 Sanctions for misuse

A copyright protection in the countries of activity, and/or an active market surveillance program, is in place for the Certified Sustainable Alaska RFM logo. The CSC has a written policy and procedures for permissible use and sanctions for misuse. Implemented sanctions are kept on file.

Incorrect or unauthorized use of the approved Certified Sustainable RFM logo or misleading references or claims to certificates in advertisements, catalogues, statements or other representations shall require immediate withdrawal of the offending material. The CSC may initiate appropriate legal action for any failure to immediately withdraw or correct the unauthorized misrepresentation.

4.5 Certification Governance

4.5.1 The Certification Body is the sole authority by which Certificates of Approval may be granted or withdrawn. The Certification Body operates under this Quality Management System (and the approved Certification Program defined by this System).

4.5.2 Applicants who satisfy the Certification Bodies that they are capable of compliance with the requirements of a particular RFM Standard and who give such undertakings as may be required to comply with the terms of this Quality Management System as amended from time to time shall be entitled to a Certificate of Approval, which shall nevertheless remain the property of the Certification Bodies.

4.5.3 Certificates are valid from the date of issue for the term specified on the certificate, subject to the terms of this Quality Management System and the accompanying RFM Procedures as amended from time to time, unless otherwise revoked under the terms of this Quality Management System and the accompanying RFM Procedures.

This is **client obligations** or something like that

4.5.4 Chain of Custody Clients shall:

- a) Give representatives of Certification Bodies access during normal working hours to production establishments in which production or storage of products, subject to the Certificate of Approval, is being carried out for the purpose of examination of products, the application of rules of production, the production environment, the

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- production processes, product handling and storage, transportation of the product, staff training, the control of product, and records and details of internal audits; or
- b) Give representatives of Certification Bodies access during normal working hours to production establishments in which production or storage of products, subject to the Certificate of Approval, is being carried out for the purpose of establishing that the procedures following the withdrawal of the Certificate of Approval as described herein have been carried out as necessary;
 - c) Give representatives of Certification Bodies access during normal working hours to establishments whose management systems are subject to the Certificate of Approval, for the purpose of examination of the management system procedures to establish they are in conformity with the Program Standard;
 - d) Nominate a management representative (and one or more deputies authorized to act in the main nominee's absence and replacement nominees as may be necessary) who shall be responsible for all matters in connection with the requirements of the Certificate of Approval;
 - e) Correct any deficiencies identified during surveillance audits;
 - f) Use a Certified Sustainable RFM logo or make a claim of RFM certification only in strict accordance with the conditions for its use of that logo or such claims;
 - g) Discontinue any use of Certified Sustainable RFM logo and any claim of compliance with this Certification Program which is outside the scope of the conditions for use of the Certified Sustainable RFM Certification logo or such claims, or which is unacceptable to the Certification Bodies or which in the opinion of the RFM Team might be misleading;
 - h) Upon withdrawal of the Certificate of Approval (however determined), forthwith discontinue use of any Certified Sustainable RFM logo for which a license has been issued and all claims or advertising matter that contains any reference thereto or makes any representation of compliance with the terms of the RFM Certification Program; and
 - i) Not conduct operations in a manner that may affect the confidence of buyers and consumers in the reliability of RFM Certification Program or bring themselves or the RFM Program into disrepute.

4.5.5 Clients and Applicants shall pay as part of formal contract agreements with Certification Bodies:

- a) The relevant annual fee for assessments, reassessments, audits, and certification;

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- b) The cost of any additional assessment, sampling, or testing audit required for the Certification Body to carry out its obligations under this RFM QMS and the RFM Procedures.

4.5.6 The Chain of Custody Certification Bodies shall:

- a) Undertake surveillance audits periodically at the establishments of Clients for the purpose of verifying that the obligations defined by the Certificate of Approval are being observed;
- b) Notify clients of any changes to the Standard and give them such time as is reasonable, in the opinion of the Standards Committees, to allow adjustment of their processes and relevant procedures to meet the revised requirements;
- c) Not disclose any information concerning an Applicant or Client obtained during the course of its assessment and certification activities other than that which is in the public domain, unless otherwise required to do so by the law, or requested and permitted to do so by the Applicant or Client; and
- d) Notify Applicants or Clients of any complaints received relating to products or management systems that apply to the Certificate of Approval.

4.5.7 If a Client is temporarily unable to comply with the requirements of these rules, as amended from time to time, the Certification Body may require the Client to discontinue any claim of compliance with the relevant RFM Program Standard and use of the Certified Sustainable Alaska RFM logo, with immediate effect until it is satisfied that compliance is again achieved. The Certification Bodies must immediately inform the Program Manager.

4.5.8 If a Client fails to comply with the rules and procedures of the RFM Program, as amended from time to time, the Certification Body on behalf of the ASMI may:

- a) Withdraw the Certificate of Approval or reduce its scope; or
- b) Refuse to grant a Certificate of Approval or extend its scope.

Such decisions, and the grounds for them, shall be communicated to the Client and Program Manager in writing.

4.5.9 The Certification Bodies may consider withdrawing or refusing to grant a Certificate of Approval if an Applicant or Client's business is no longer solvent or recognized as such by the United States of America or Canada

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4.6 Complaints and Appeals

This section covers the handling of all complaints and appeals received by the CSC in relation to the operation of the RFM Certification Program including concerns related to standard setting, scheme governance, quality assurance and misuse of the Certified Sustainable RFM logo. It describes the actions to be taken by the CSC for effective follow-up, monitoring and review of complaints and appeals. The procedure is accessible to certification clients, applicants and interested members of the public.

4.6.1 Confirm Submission is Within Scope

The CSC will review every written expression of dissatisfaction it receives regarding the RFM Certification Program. The Program Manager will evaluate each submission to determine if it falls within program scope. Complaints about RFM certified or applicant organizations, whether Chain of Custody (CoC) clients or fishery clients, will be deemed out of scope if the issues raised in the submission are primarily about:

- Product integrity or quality; or
- Business practices of the organization that are unrelated to RFM certification; or
- Issues that are otherwise not materially related to compliance with RFM Certification Standards.

Complaints, which are found to be out of scope, will be referred to the respective client for appropriate action and will not be recorded in the RFM Complaint Register.

4.6.2 The rules and procedures of the RFM Program may, from time to time, be altered by the CSC. No alterations shall affect the right of Clients to claim compliance with the RFM Certification Program, use an associated Certified Sustainable RFM logo, or issue a Statement of Conformity unless the Program Manager has given them notice in writing of such alterations. A date by which the altered rules come into force shall be issued by ASMI and shall not be less than six months from the date of notification of the alteration.

4.6.3 Each Certification Body shall keep a register of Certified Clients, which shall be available upon request to the public. The CSC will maintain a published master list of all Clients, which will be available to the public.

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4.7 Issue and Maintenance of Certificates of Approval

4.7.1 The Certification Body will issue Certificates and Certificates of Approval only in accordance with the terms of this QMS and the RFM Procedures. In considering whether to issue or maintain a Certificate or Certificate of Approval the Certification Body must scrutinize all reports arising from assessments and surveillance audits of the Applicant or Client.

4.7.2 RFM Fishery Certificates can be extended for cause by a Certification Body after approval of the RFM Team. Extension requests will be accepted or rejected after a formal written request has been made to Program Manager.

The Certification Body will initiate the request for extension to the Program Manager after appraising its technical merit. The RFM Team will review the request and respond to the Certification Body in writing. The Accreditation Board's review of the Certification Body's compliance with the scheme shall include a review of extension requests.

4.7.3 RFM Fishery Certificates and Chain of Custody Certificates can be transferred from one approved Certification Body to another approved Certification Body as permitted by the applicable RFM Procedures. (Full details of the process is available in Procedure 4)

4.7.4 In cases where a Client fails to continue to meet the requirements for Certification of the RFM Program, the Certificate of Approval may be suspended or withdrawn in accordance with the applicable RFM Procedure.

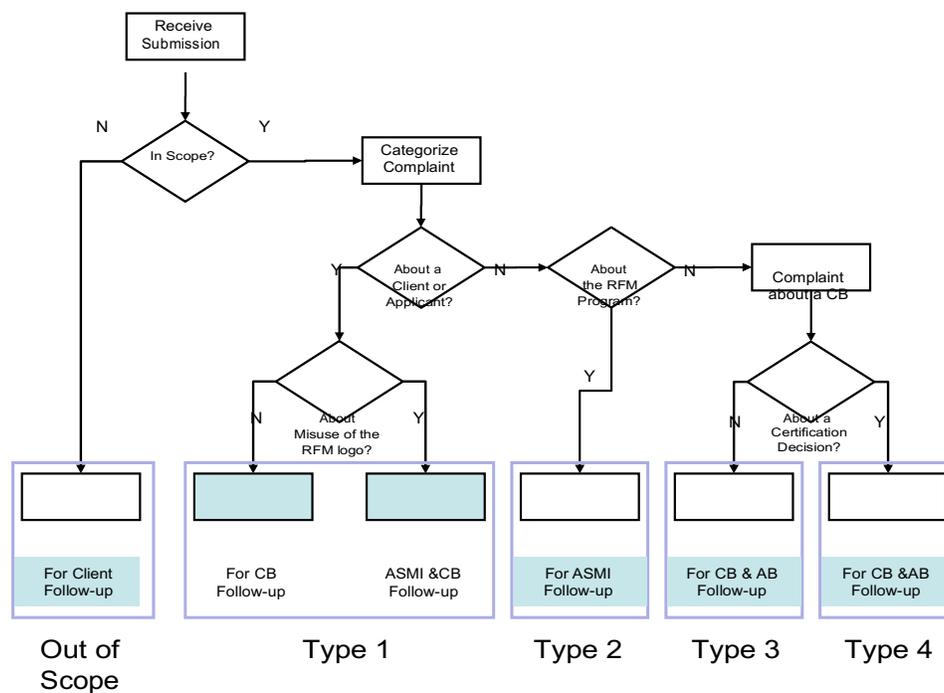
4.8 Complaints about Certified Products or Program Operation

4.8.1 Categorization

Complaints which are confirmed as falling within the scope of this procedure will be categorized and managed according to four types and an appeal process:

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- Type 1 - Complaint about an applicant or RFM certified organization⁴;
- Type 2 - Complaint about the RFM standard setting process or RFM operations;
- Type 3 - Complaint about a CSC-approved Certification Body; and
- Type 4 - Complaint of a certification decision.
- Appeal of a certification decision by a Certification Body (see 5.5)



5. Handling Complaints and Appeals

5.1 Complaint about an RFM Certified Organization (Type 1)

⁴ Type 1 complaints include allegations of misuse of the Certified Sustainable RFM Logo or RFM Claim.

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In general, a complaint about an RFM certified or applicant organization (Type 1) will be referred to the Certification Body of record in the first instance. The complaint will be logged in the RFM Complaint Register and the Certification Body will be instructed to investigate the complaint in line with RFM requirements for Fishery Certification (Procedure 2) and/or Chain of Custody Certification (Procedure 4) as applicable. The CSC will request the Certification Body to report back on the outcome of its investigation within 30 days.

In addition to the foregoing, if the complainant has alleged a misuse of the Certified Sustainable RFM logo by the organization, The CSC will initiate its own investigation of the complaint. At the direction of the Program Manager, the RFM Team will gather evidence to establish a record of the products involved, including all product forms, species, regions of harvest, associated organizations, and sales. The RFM Team may also conduct a trace- back study if doing so is warranted based on results from the investigation. NOTE: A breach of the Terms of Conditions for Use of the Certified Sustainable RFM logo may lead to a product recall. Sanctions may apply as described in RFM Procedure 6. The RFM Team will notify the Certification Body about potential misuse of the Certified Sustainable RFM logo by the client, direct the Certification Body to perform its own investigation of the complaint, and instruct the Certification Body to report back on the extent of the issue. The RFM Team will inform the Program Manager or designee, when the complaint has been closed-out, identifying any corrective actions that were taken as a result of the complaint investigation. The Executive Director, or designee, will inform the complainant of the outcome.

5.2 Complaint about the RFM Program (Type 2)

Complaints about the RFM Certification Program itself (Type 2 complaints) are within the scope of this procedure. Type 2 complaints may extend to issues concerning standard setting/revision processes, scheme governance, or administrative functions. Type 2 complaints are a priority and as such will be communicated to the Program Manager or designee, for immediate attention. The Program Manager or designee, will acknowledge receipt and inform the complainant of how the CSC will investigate the complaint and the likely timeframe for a formal response. If the Program Manager or designee, appoints a lead person from within

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the RFM Team to investigate the complaint, that appointee shall be, to the extent practical, independent of those activities that were highlighted in the complaint. Results of the investigation will be documented. When the investigation is concluded, the Program Manager will inform the complainant of the outcome, including any corrective actions taken.

5.3 Complaint about a Certification Body (Type 3)

Complaints about the activities of an CSC-approved Certification Body in relation to the RFM Certification Program (Type 3 Complaint) will be managed by the Program Manager or designee. Receipt of the complaint will be acknowledged and an investigation will be initiated as appropriate to the nature and extent of the allegations made in the complaint. At a minimum, ASMI will:

- Inform the Certification Body of the details of the complaint;
- Inform the Accreditation Body of record of the details of the complaint; and
- Request a formal response from the Certification Body to the concerns raised;

The Program Manager will be responsible for seeking and managing resolution of all Type 3 complaints. This will include follow-up communications with the complainant to assess whether the Certification Body's response to the complaint, as well as any associated corrective actions taken, was satisfactory to resolve the complaint. In the event of an unresolved complaint, Program Manager, will inform the complainant of the option to resubmit their complaint directly to the Accreditation Body of record for further consideration.

5.4 Complaint Concerning Certification Decision (Type 4)

If a client or applicant or external party wishes to challenge the certification decision⁵ taken by an CSC-approved Certification Body, the party shall within 14 days of official notification of the decision,

⁵A certification decision may be positive or negative and it may entail granting or refusing certification, extending or reducing certification scope, or suspending or withdrawing a certificate.

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submit a written complaint to the Certification Body with the Program Manager in copy. The submission must clearly state the basis for the complaint, identifying the relationship of the complainant to the certification client or applicant and describing any participation by the complainant in the assessment process. The Certification Body will initiate its own process in line with its own procedures and in accordance with ISO 17065 for responding to the complaint. Upon completion, the Certification Body will inform the complainant, client or applicant, and the CSC of the outcome.

5.5 Appeal of Certification Decision

If a complainant is dissatisfied with the outcome of the Certification Body's complaints process, the party may, within 14 days of notification of the Certification Body's decision, lodge an appeal with the CSC.

Upon receipt of an appeal, the Program Manager will review the submission to confirm that the technical matters raised therein have merit and that the appellant is of sufficient standing (only registered stakeholders and clients/applicants have standing to lodge an appeal). After such preliminary matters are confirmed, upon the payment of US \$7,500 appeal fee, the Program Manager will accept the appeal and will confer with the Chairman of the RFM Fisheries Standard Committee (FSC) for the purpose of identifying suitably qualified people to serve on an Appeals Panel. The panel shall be comprised of one to three persons with relevant expertise in the subject matter under appeal, familiarity with certification processes, and knowledge of the RFM Standards. Panel members will be appointed on an *ad hoc* basis and may be drawn from the FSC or other qualified individuals⁶, however no person with a commercial interest or known bias in the subject of the appeal will be appointed to serve on an Appeals Panel.

⁶ The RFM Team may keep a list of suitably qualified individuals who are interested in serving on an Appeals Panel.

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The Appeals Panel will hold a meeting (or teleconference) within 30 days of acceptance of the appeal. The Appeals Panel will follow the procedures and the standard of review as outlined in the Appeals Panel Terms of Reference. The objective of the appeal review is to determine whether the certification decision that was taken by the Certification Body was materially affected by: 1) a procedural error arising during the assessment; or 2) an error of fact whether through misinterpretation, omission or otherwise. Panel members will not substitute their own views or opinions for those of the Certification Body. At its discretion, the panel may request additional information or clarification from the Certification Body, client, appellant and/or other parties as the panel deems necessary to conduct the review. The RFM team will appoint a secretary to assist the panel with the collection of information.

After completing its review of relevant material evidence, the Appeals Panel will prepare a written decision summarizing their findings. The panel's written decision will include a clear statement as to whether the certification decision should be upheld or not, the basis for that decision, and any recommended actions arising from their review. The decision by the Appeals Panel is final and is not subject to further appeal. The CSC will inform the appellant, client or applicant, Certification Body, and the Accreditation Body of record of the decision of the Appeals Panel. If the Appeals Panel finds in favor of the appellant, the Certification Body will be required to review its certification decision and submit its findings to its Accreditation Body and to the CSC.

5.6 RFM Complaint Records

A complaints register will be maintained by the RFM Team and will be made available for internal and third party system audits.

5.6.1 Records shall be maintained by the Certification Bodies as defined within their documented Quality Systems to demonstrate compliance with the system and appropriate regulatory requirements. The records include reports arising from assessments and audits.

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5.6.2 The Certification Body records shall be safely stored for a period of five years unless otherwise specified.

5.6.3 The information contained in the Certification Body records, other than that which is in the public domain, will be held in confidence unless release is required by the law, requested/permitted by the Client, or agreed to by the Client under the terms of the Program.

5.6.4 Issue and Control of Documents

The following documents are maintained and issued on a controlled basis by the CSC announced through the RFM website:

- a) The Quality Management System (QMS) and Procedures 1-8 for the RFM Program⁴
- b) RFM Program Standards

5.6.5 Amendments

Amendments to this QMS, its Procedures and the RFM Program Standards will be developed in accordance with the procedures defined in this QMS and must be reviewed and approved by the CSC Foundation Board before issue.

5.6.6 Master Lists of Clients and Certified Products

ASMI will maintain a master list of certified Clients and fisheries that will be available on its website. Certification Bodies will maintain a list of their own Clients and ensure that the CSC is informed of changes and additions of new Clients.

5.6.7 The operation of the RFM Program's activities and performance will be subject to an annual internal review to assess the implementation and adequacy of the systems defined in the RFM QMS, Procedures and Standards and ensures continued compliance with the RFM Program QMS and Procedures.

The RFM Team will conduct the review and record any non-compliances with documented procedures, recommend corrective actions, and identified issues with implementation and adequacy of the program and its systems. Where appropriate, the RFM Team will make recommendations for systems improvements.

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Follow-up reviews will be conducted where necessary to verify corrective actions.

5.6.8 On-going review of Certification Body assessment performance is achieved by a combination of monitoring of assessment reports, continuous contact with assessment staff, and witness of assessments conducted by individual Assessors and assessments to ensure compliance with and consistent interpretation of RFM Program Procedures and Standards.

5.6.9 The RFM Team will make a report on the findings of this review that is presented to the CSC Foundation Board.

6. ACCREDITATION MANAGEMENT

6.1.1 Certification Bodies may seek accreditation to perform certification activities under the RFM Program through an Accreditation Body belonging to the International Accreditation Forum.

6.1.2 Any Accreditation Bodies that offer accreditation to the RFM Program will be required to commit to the CSC that accreditation services provided to any RFM participating Certification Body will be compliant with the RFM Program and the requirements of ISO/IEC 17011.

6.1.3 The CSC does not restrict choice or use of Accreditation Bodies. Accreditation Bodies must meet the requirements of the RFM program, ISO 17011 and will be required to enter an MOU with scheme owner.

6.1.4 The CSC specifies the requirements for Certification Bodies that the Accreditation Body is required to verify.

6.1.5 Subsequent to any changes in the certification and procedures requirements, the CSC ensures Certification Bodies are given a defined time period to conform to the changes. The time period is relative to the significance of the change.

6.1.6 The CSC requires (through the engagement of only Accreditation Bodies approved by the International Accreditation Forum Accreditation Bodies) that:

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- 1) The Accreditation Body employs personnel that have the necessary education, training, technical knowledge, and experience for performing accreditation functions in fisheries and supply chain operations. This includes knowledge of the RFM standards and their purposes.
- 2) The Accreditation Body makes information available on request about its organizational structure and the financial and other kinds of support it receives from public or private entities.
- 3) The accreditation process includes an office audit of the Certification Body.
- 4) The accreditation process includes a review of the performance of Certification Body and Assessors in the field by witness assessments, as needed or required by the Program Manager
- 5) Any Certification Bodies operating in the RFM Program are accredited to ISO/IEC 17065 for the scope of the applicable RFM Standard.

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Appendix:

The principal objectives of the RFM Certification Program are:

- a) To promote the principles of responsible fisheries management.
- b) To provide independent third-party verification that qualifying management systems conform to specified Best Practices Fishery Management requirements established by the RFM Certification Program;
- c) To demonstrate by a Certificate of Approval, Certified Logo, or Certified Statement of Conformity that products have been harvested, produced, or prepared in compliance with standards of the RFM Certification Program;
- d) To provide both large and small businesses with cost effective means to supply the marketplace with 'RFM Chain of Custody' certified products; and
- e) To provide a range of Alaskan fisheries products certified to the RFM Standards to buyers and consumers.

The RFM Program and Standards management review, in general will consider and follow the general best practice criteria and guidance outlined in the following documents (referenced in 2.1):

- a) World Trade Organization, Technical Barrier to Trade Agreement, Annex 3 - Code of Good Practice for the Preparation, Adoption and Application of Standards;
- b) ISO Guide 59:1994 Code of Good Practice for Standardization;
- c) ISO 17067:2013 Conformity Assessment – Fundamentals of Product Certification and Guidelines for Product Certification Programs;
- d) ISEAL Code of Good Practice for Setting Social and Environmental Standards v5.0, 2010;
- e) ISEAL Code of Good Practice for Assuring Conformance with Social and Environmental Standards, 2012;
- f) ISEAL Code of Good Practice for Assessing the Impacts of Social and Environmental Standards, 2013;
- g) FAO Guidelines on Bycatch Management and Reduction of Discards (2011);

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- h) FAO Guidelines for the Ecolabelling of Fish and Fishery Products from Inland Capture Fisheries (2011);
- i) FAO Guidelines on the Management of Deep Sea Fisheries on the High Seas (2008);
- j) FAO Voluntary Guidelines for Securing Sustainable Small Scale Fisheries in the Context of Food Security and Poverty Eradication (2014);
- k) ISO/IEC 17065:2012 Conformity assessment – Requirements for bodies certifying products, processes and services;
- l) The FAO Code of Conduct for Responsible Fisheries 1995;
- m) The FAO Guidelines for the Eco-labelling of Fish and Fishery Products from Marine Captured Fisheries; and
- n) The GSSI Benchmark Tool for Seafood Certification Programs (Version September 2015);
- o) ISO 17030- Conformity assessment- General requirements for third-party marks of conformity 2003
- p) ISO/IEC 17011:2004 Conformity assessment – General requirements for accreditation bodies accrediting conformity assessment bodies



Certified Seafood Collaborative