ICELAND RESPONSIBLE FISHERIES FOUNDATION



Responsible Fisheries Management Chain of Custody Standard

A Tool for Voluntary Use in Markets for Certified Products of Marine Capture Fisheries

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Foreword

This standard forms part of the Iceland Responsible Fisheries Management Certification Programme which is based on the 1995 FAO Code of Conduct for Responsible Fisheries and on the FAO Guidelines for the Eco-labelling of Fish and Fishery Products from Marine Capture Fisheries adopted in 2005 and amended/extended in 2009. These in turn are based on the current suite of agreed international instruments addressing fisheries, in particular the 1982 UN Convention on the Law of the Sea, the 1995 UN Fish Stocks Agreement, as well as related documentation including the 2001 Reykjavik Declaration on Responsible Fisheries in the Marine Ecosystem, as well as various other relevant documents from ISO and other sources.¹

The standard is owned by Iceland Responsible Fisheries Foundation.

The Programme has two complementary elements:

- Responsible Fisheries Management Standard.
- Chain of Custody Standard.

The programme is the direct result of pro-active discussions and interaction with fishermen, packers, processors, markets, regulators, standards and certification experts.

The certification and accreditation programme is based on internationally accredited ISO/IEC 17065:2012 standards, which assure consistent, competent and independent certification practices.

ISO/IEC 17065:2012 accreditation by an IAF (International Accreditation Forum) accreditation body, gives the programme recognition and a credibility position in the international marketplace and ensures that products certified under the programme are identified at a recognized level of assurance. Demonstration of compliance will be through a rigorous verification and audit by a competent, third party certification body.

¹ The development of the first version of this standard was facilitaded by the Fisheries Association of Iceland (FAI). The FAI was founded in 1911. The following (non-governmental) organizations are members of FAI: Fisheries Iceland (SFS), National Association of Small Boat Owners (NASBO), The Icelandic Seamen's Federation (SSI), The Federation of General and Special Workers in Iceland (SGS), The Icelandic Union of Marine Engineers and Metal Technicians (VM), The Icelandic Ships Officers Association (FFSÍ).

The purpose of the standard is to provide the fishing industry with a clear statement of the requirements which require to be achieved by Applicants to gain "Certification of Chain of Custody". Certification to the requirements under the standard will demonstrate a commitment that through licensed use of the certification mark will communicate to customers and consumers the provenance of Icelandic fish.

A unique certification mark has been developed which can be used to signify compliance of a certified product to the chain of custody standard as part of the Iceland Responsible Fisheries Management Certification Programme.

Through the programme framework, the requirements for chain of custody certification will be subject to continual review and improvement to ensure that it continues to serve stakeholder and consumer needs.

Principles of the Process

To become certified as meeting the Iceland Responsible Fisheries Management (IRFM) Chain of Custody Standard applicants must be able to demonstrate compliance with this standard, through an independent audit by an approved certification body.

The certification body must be approved and be accredited to ISO/IEC 17065:2012 (Conformity assessment - Requirements for bodies certifying products, processes and services) by an accreditation body who is a member of the International Accreditation Forum (IAF).

The chosen certification body will formulate a contract between the company and the certification body detailing the requirements and commitments needed from the company.

The objective of IRFM chain of custody certification is to provide an assurance to a labelled 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 logo really is 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

Applicant: A company or group of companies in the supply chain that has **formally** applied to meet the IRFM Chain of Custody Standard through the formal Application Form.

Certified Fishery: A fishery that has been independently certified as meeting the "Iceland Responsible Fishery Management (IRFM) Standard".

Certified seafood and certified seafood products: Seafood and seafood products originating in a certified fishery.

² FAO 2005/2009 Guidelines for the Ecolabelling of Fish and Fishery Products from Marine Capture Fisheries.

Chain of Custody Standard: The list of requirements that the company must meet to claim certification to the IRFM Chain of Custody Standard and /or use the certified claim.

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

Certification Mark: A distinctive logo, mark or statement which has been approved by the standard owner and verifies that the fish has been sourced from and is traceable back to a certified fishery.

Chain of Custody Registration Number: An IRFM Chain of Custody Standard certificate registration number issued by the certification body to each company certified to the IRFM Chain of Custody Standard.

Stage: A handling / transfer point in the supply chain e.g. vessel, packing, processing, distribution and sales.

Multi-site Organization: An organisation that has more than one site under its direct control and applies for certification for these sites.

Single-site Organization: A company that has one site that applies for certification under this standard.

Subcontractor: A third party or affiliate that is appointed to carry out work for the company (includes contract processors, packers, labelling and any other product processing facilities).

Service Provider: A third party or affiliate that is appointed to carry out work for the company (includes contract transportation companies, distribution companies and any other storage facilities).

Certification Options

Single-site Certification: This certification is applicable to any single-site organization handling or trading certified products that complies with section 1 to 4 of this IRFM chain of custody standard.

Multi-site Certification: This certification is applicable to any multi-site organization handling or trading certified products where the organisation does not have a designated central office function. In this case every site under the scope of certification complies with section 1 to 4 of this IRFM chain of custody standard.

The certification body individually audits every site. A single CoC code and certificate is issued defining all the sites under the scope of certification.

Outline of the Chain of Custody Certification Process

The IRFM chain of custody certification process is managed by the ISO accredited independent certification body listed on the IRFM website www.responsiblefisheries.is.

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

Stage 1. Information Request

Information may be requested from an applicant within the Supply Chain. An applicant could be a:

- Processing Vessel or Processing Vessel Group;
- Primary Processor;
- Secondary Processor;
- Sales-and Marketing Company;
- Market: Food Service, Retailer, Restaurant.

Applicants may request information from the standard owner 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 to ascertain their readiness for external audit.

Applicants are advised that all information given to the certification body will remain confidential.

It is not a requirement for the transport or storage / distribution companies to hold certification to the IRFM Chain of Custody Standard, as these companies are classified as entities within supply chain which do not take physical control or only handle storage and distribution in packaging or containers that prevent tampering with certified seafood.

Stage 2. Completion of Application Form

If the company wishes to progress to application it will be requested to formally provide information on its product handling details and the previous product supply chain to the certification body, using the IRFM 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 chain of custody registration number.

Stage 3. Certification Body prepares an Audit Plan

Each Company and its supply chain is different and therefore the certification body will create a relevant audit plan to validate the chain of custody for the applicant's relevant product and supply chain which was detailed in their application form.

The company shall demonstrate its potential to trace product to an IRFM certified source, certified to the fishery or chain of custody standard.

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

Stage 4. Audit

Audit at the company's facility/facilities is carried out by an independent auditor approved and acting for the certification body. The audit is against the IRFM chain of custody standard.

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

The certification body's auditor will carry out the audit in an independent, professional and courteous manner.

Key components of the chain of custody standard include requirements for:

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

Stage 5. Audit Report

During the audit the auditor will compile an audit report on how the company does/does not meet the IRFM chain of custody standard.

The IRFM chain of custody standard will require specific interpretations of the clauses by the auditor to ensure they relate accurately to different sectors including packing, processing, distribution and selling of seafood products and materials.

The audit report will identify any non-conformities against the IRFM chain of custody standard. The company will be required to provide corrective action evidence to the auditor for identified non-conformities within 28 calendar days from close of audit.

Stage 6. Certification Decision

The company's audit 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 auditor and an expertise in certification.

Stage 7. Certification

When certification has been approved, the company shall be notified within 10 working days of the certification decision. Following this notification, a certificate of approval will be issued to the company.

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 audits with the exceptions of sales- and marketing companies (traders) which will have 18 monthly surveillance audits.

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

The company will be awarded certification for its facility/facilities if it meets the IRFM chain of custody standard.

Stage 8. Access to Certification Mark/Statement

Companies who have a valid IRFM chain of custody certificate can apply to the standard owner for a permit to use the IRFM certification mark.

Appeals

The company has the right to appeal the certification decision of the certification body. Appeals should be made in writing within seven days of the certification decision.

A full response will be given by a certification body representative independent of the auditor and certification committee.

Further Information

Further Information regarding application, rules and regulations can be obtained from the standard owner or the certification body:

Iceland Responsible Fisheries Foundation Borgartún 35, 105 Reykjavík, Iceland

www.responsiblefisheries.is

SAI Global/Global Trust Certification Ltd.
Quay Street Business Park,
Dundalk,
Ireland

Chain of Custody Standard Requirements

This standard details the set of requirements that must be certified as being in place to ensure that the seafood product put on the market and bearing the ecolabel logo really is 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.³

1.0 General Principles of Traceability for Chain of Custody

- 1.1 The company shall have a documented policy to state that it is committed to the IRFM chain of custody standard. This must be:
 - Signed by the person with overall responsibility for the site;
 - Communicated to all staff.
- 1.2 Only seafood products that originate from an IRFM certified responsibly managed fishery may carry the IRFM certification mark.
- 1.3 IRFM certified seafood products shall be kept readily identifiable and where necessary kept clearly separated from non-certified seafood products.
- 1.4 The company shall have traceability system that has the ability to identify the certified seafood products and trace those products back to the certified fishery.
- 1.5 Certified product must be labelled or otherwise be identified in a manner that ensures traceability is maintained from receipt, during intake, processing, storage, dispatch, handling and delivery to a customer.
- 1.6 The company shall comply with the applicable national/federal and/or regional/state regulations on labelling and traceability for its stage within the supply chain.
- 1.7 The company shall have a system in place to ensure that purchased seafood carrying the IRFM certification mark is not mixed with non-certified seafood during transportation to and from the site and in third party storage if applicable.

³FAO 2005/2009 Guidelines for the Ecolabelling of Fish and Fishery Products from Marine Capture Fisheries.

- 1.8 Where the company utilises the services of a subcontractor (carrying out contract processing, packing or labelling activities), the subcontractor shall be certified to the IRFM chain of custody standard.
- 1.9 Where the company utilises the services of third party service providers, a contract or equivalent documentary evidence shall be in place demonstrating that product traceability and tamper proofing are ensured during storage, distribution or transportation.

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 seafood products shall be kept separate from non-certified seafood products throughout all stages such as receipt, storage, processing, packing, labelling, sales and delivery if they are to carry the official certification mark. This may be achieved by:
 - Physical separation;
 - Temporal separation.
- 2.3 Where certified and non-certified seafood is mixed the final product is not eligible for carrying the IRFM certification mark with the following exception:
 - For compound products including ready meals, these may contain noncertified seafood ingredients within the final product where the non-certified seafood ingredients shall be 5% or less by weight of the total seafood ingredients in the final product.
- 2.4 The company shall operate a system that allows any product or batch of products sold/marketed by the organization as originating from a certified fishery to be verified through documentation.
- 2.5 Procedures shall be established by the company to deal with any non-conformities in the traceability system.
- 2.6 The company shall operate a product recall system that will be activated if certified seafood is mixed with non-certified seafood. The relevant certification body shall be notified within 3 working days in the event of a certified product being recalled. The

product recall system shall be tested annually with documented results retained for inspection.

3.0 Traceability and Labelling

- 3.1 The company shall test the efficacy of their batch control and traceability system through a thorough documented internal audit conducted no less than once per year and the results shall be retained for inspection. The test shall include a traceability challenge (backwards and forwards) and a quantity check/mass balance.
- 3.2 Documentation must be available that verifies the identity of the certified seafood as originating from an IRFM certified fishery.
- 3.3 Certified seafood products shall be labelled or otherwise be identified in a manner that ensures traceability is maintained during packaging, storage, handling and delivery.
- 3.4 The company shall be required to be able to track and trace the certified product one step forward and one step back to the certified fishery.
- 3.5 Each certified product shall be labelled with necessary information which is appropriate for the company's stage in the supply chain. The information should at minimum include the following:
 - Commercial species name;
 - Country of origin;
 - Fishing/catch area;
 - Product description;
 - Product code or production code number.
- 3.6 Each outgoing batch/lot of certified seafood product shall be identified as IRFM certified on product packaging or associated documentation (e.g. sales invoice, dispatch documentation).
- 3.7 The company shall operate a secure system for the production, storage and application of product labels bearing the IRFM certification mark and will ensure that only certified seafood product is labelled as such.
- 3.8 A record of all certified incoming products shall be maintained, showing the name of the supplier, their unique chain of custody certificate number, evidence of IRFM Chain of Custody certificate validity, and sufficient other

- details to allow the tracing of those inputs back to their suppliers and the certified fishery.
- 3.9 Traceability records shall be kept for a reasonable period to correspond with the shelf life of the product with a minimum of three years. Traceability records shall be accurate, legible and unadulterated.
- 3.10 The company shall have a documented procedure for handling nonconformities 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 Non-conformity procedures shall include documented corrections and corrective actions, normally within 28 days.
- 3.12 The company shall keep a documented record of customer complaints or feedback concerning the labelled certified seafood and take appropriate action with respect to such complaints.
- 3.13 The company must only use the IRFM certification mark if it has valid certification to the IRFM chain of custody standard.
- 3.14 The company must only use the IRFM certification mark if it has documented evidence demonstrating that it has been granted approval to do so by the standard owner.

4.0 Training

The company shall put in place documented programmes covering the training needs of all relevant personnel.

- 4.1 Records of all training must be available. This must include as a minimum:
 - The name of the trainee and signed confirmation of attendance;
 - The date of the training;
 - The title or course contents, as appropriate;
 - The training provider.

4.2 The company shall routinely review the competencies of its staff, at least annually. As appropriate, it must provide relevant training. This may be in the form of training, refresher training or coaching, mentoring or on-the-job experience.