



GLOBAL BENCHMARK TOOL

GSSI Benchmark Report

Scheme: Certified Seafood Collaborative - Responsible Fisheries Management

Scope: Responsible Fisheries Management Standard (version 2.1, 2020)

Date: 30 June 2023

STATEMENT OF RECOGNITION

Scheme	Responsible Fisheries Management
Scope	Responsible Fisheries Management Standard (version 2.1, 2020)
Date	30 June 2023

The Global Sustainable Seafood Initiative (GSSI) Steering Board recognizes the Responsible Fisheries Management (RFM) Standard to be in alignment with all applicable essential components of:

A	Section A. Governance of Seafood Certification Schemes
B	Section B. Operational Management of Seafood Certification Schemes
D	Section D. Fisheries Certification Standards

Thereby, GSSI considers the above seafood certification scheme to be in alignment with the FAO Guidelines for the Ecolabelling of Fish and Fishery Products from Marine/Inland Capture Fisheries.

This Report lists evidence of alignment with applicable GSSI Essential Components and GSSI Supplementary Components, where implemented.








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SCHEME OVERVIEW

Scheme name	Certified Seafood Collaborative – Responsible Fisheries Management
About	<p>Buying seafood from RFM Certified fisheries provides documented third-party assurance of responsible seafood sourcing practices and proof of origin, all without paying logo fees.</p> <p>On July 1, 2020, the Certified Seafood Collaborative (CSC), a 501(c)(3) 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. 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 geographic scope of the program has been expanded to include fisheries operating within the U.S. and Canadian 200 NM EEZ.</p> <p>Visit https://rfmcertification.org/about-rfm for more information.</p>
Headquarter location	Juneau, United States of America
Scope	Responsible Fisheries Management Standard (version 2.1, 2020)

FROM APPLICATION TO RECOGNITION

	1 ↓	Application Received	The Benchmark Process begins once a Scheme Owner decides to apply for recognition and contacts the Secretariat, who provides an overview of the process.
	2 ↓	Desktop Review	This step helps to assess the Scheme Owner's capability to proceed and successfully complete the Benchmark Process within the expected timeframe.
	3 ↓	Office Visit	The Office Visit may be conducted by the Process IE or both IEs, depending on the outstanding issues of the Desktop Review.
	4 ↓	Benchmark Committee Meeting	The Benchmark Committee acts as the 'Quality Assurance' for the work undertaken by the IE team in the Desktop Review and Office Visit.
	5 ↓	Public Consultation	If recognition is recommended by the Benchmark Committee, the Scheme Owner's approval is required to publish the Benchmark Report for a four-week Public Consultation.
	6 ↓	Recognition Decision by Steering Board	The Steering Board is briefed by the Steering Board Liaison on the Benchmark Report and the Benchmark Committee's recommendation for recognition.
	7	Monitoring of Continued Alignment	GSSI ensures continued alignment of recognized schemes with GSSI Essential Components through an annual reporting process of relevant changes.

Read more about the steps to recognition [here](#).

WHO WAS INVOLVED



Scheme Representative

Responsible Fisheries Management



Independent Expert (Process)

Aimee Russillo



Independent Expert (Technical)

Jose Peiro Crespo



Steering Board Liaison

Flavio Corsin



GSSI Secretariat Representative

Meghan Haupt



Steering Board Members

Adriana Sanchez
Angel Matamoro Irago
Annika Mackensen
Flavio Corsin
Han Han
Ingrid Kelling
Jennifer Dianto Kemmerly
Judy Panayos
Laurent Develle
Marcelo Hidalgo
Nianjun Shen
Sonia Cordera
Trent Hartill



Benchmark Committee Members

Anil Sasidharan
Carlos Sonderblohm
Josanna Busby

EVIDENCE OF ALIGNMENT

A	Section A. Governance of Seafood Certification Schemes
B	Section B. Operational Management of Seafood Certification Schemes
D	Section D. Fisheries Certification Standards

**SECTION A.
GOVERNANCE OF
SEAFOOD
CERTIFICATION
SCHEMES**



A.1 SCHEME GOVERNANCE

A.1.01 Legal Status		
GSSI Component	Guidance	
The Scheme Owner is a legal entity, or an organization that is a partnership of legal entities, or a government or inter-governmental agency.	<p>Scheme Owner is an entity which could be held legally responsible for its operations.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> - an official document showing registration with legal authorities and current legal status of organization. Examples include incorporation papers, statutes, business licenses and registration with tax authorities. <p>For government Scheme Owners, clear lines of responsibility and authority on decision making should be identified.</p> <p>Pre-application to require scheme to identify legal registered entity or lead government agency/department.</p>	
Conclusion	References	
<p>The Responsible Fisheries Management (RFM) Program is in alignment because the scheme owner, the Certified Seafood Collaborative (CSC), is a 501(c)(3) non-profit foundation organization and was initially developed by the Alaska Seafood Marketing Institute (ASMI), which is a public-private partnership between the State of Alaska and the Alaskan seafood industry established to foster economic development of Alaskan fishery resources. In 2020, the CSC became the owner of the Responsible Fisheries Management (RFM) Certification program. The Alaska Seafood Marketing Institute officially handed over ownership after a six-month period of transition.</p> <p>The legal entity is registered with the Department of Commerce and the Incorporation Certificate is attached. CSC was officially registered with the US tax authority IRS 02/01/2022 as a 501 c3 public charity</p>	<ul style="list-style-type: none"> • Chapter 16.51. Alaska Seafood Marketing Institute 2004 • CSC Certificate of Incorporation • CSC IRS determination letter 	

A . 1 S C H E M E G O V E R N A N C E

A.1.02 Impartiality

GSSI Component	Guidance	
The Scheme Owner is not directly engaged in the operational affairs (auditing or certification) of the certification or accreditation program.	<p>Scheme Owner is not directly engaged in auditing, certification or accreditation activities in order to ensure freedom of commercial or financial pressure of assurance processes and decision making.</p> <p>This does not include complaint resolution or performance reviews.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> - impartiality policy, impartiality clauses in certification body and accreditation body contracts, management control procedures 	
Conclusion		References
<p>The Responsible Fisheries Management (RFM) Program is in alignment because CSC is not directly engaged in auditing, certification or accreditation activities in order to ensure freedom of commercial or financial pressure of assurance processes and decision making.</p> <p>Section 3.3.3 QMS: The Certification Bodies approved by CSC Board must be accredited to ISO 17065 which requires this financial and governance independence.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> - CB Contracts - QMS manual 3.3.3 		<ul style="list-style-type: none"> • CB contract (example showing CBs are required to provide auditing and certification services) • RFM Governance Schematic <ul style="list-style-type: none"> • https://rfmcertification.org/about-rfm/governance/ • RFM Quality Management System <ul style="list-style-type: none"> • Sections 3.3, 3.3.2, 3.3.3, 3.3.4, 3.4 • https://rfmcertification.org/wp-content/uploads/2022/08/QMS-Chapters-1-7_Final.pdf

A . 1 S C H E M E G O V E R N A N C E

A.1.03 Operating Procedures		
GSSI Component	Guidance	
<p>The Scheme Owner operates to a documented set of governance policies and procedures specifying at least the following:</p> <ul style="list-style-type: none"> - Board or governance body election or appointment process, - Process to facilitate participation of stakeholders - Board or governance body representation and Terms of Reference, - Member categories (where applicable), - Income generation or funding processes, - An organizational structure, - The decision-making processes of each governance body, - Key personnel roles (responsibility and authority), - Managing conflict of interest, and - quality assurance program. 	<p>The Scheme Owner has policies/procedures available covering all aspects in this Essential Component except Member categories if not applicable.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> - statutes and by-laws, organizational chart, internal procedures, job descriptions, conflict of interest statements, quality assurance procedures or manual. - online process document for submission of input, governance body selection process and stakeholder composition, review of previous stakeholder inputs and verify if/how this reached top governance. 	
Conclusion	References	
<p>The RFM Program is in alignment because the policies and procedures for the RFM scheme are detailed in the RFM QMS and related procedures 1 to 10.</p> <p>A list of the appointed Board of Governance Members and Standard Committees are publicly available. Committee members are described in a biographies document.</p> <p>Decision making process, rules of procedure, conflict of interest and appointment are described in the Terms of Reference. The key personnel that manage the day to day scheme operations are listed.</p> <p>Job descriptions are available for the CSC team.</p>	<ul style="list-style-type: none"> • Committee members biographies • https://rfmcertification.org/wp-content/uploads/2021/06/FSC-Master-Bio-List_July2018.pdf • Committee Terms of Reference • https://cdn.rfmcertification.org/wp-content/uploads/2021/06/FSC-TOR_June2016.pdf • Committee ToRs - Fisheries • https://rfmcertification.org/wp-content/uploads/2022/09/FSC-TOR_Sept-2022_Final.pdf • CSC job descriptions 	

A . 1 S C H E M E G O V E R N A N C E

A.1.03 Operating Procedures

The RFM webpage on governance provides clarification around the governance groups, including the Board of Directors, CSC Management Board, and two advisory committees (Fisheries Standards and Unified CoC).

The Board of Directors is a subset of the CSC Management Board. It has responsibility for the legal operation of the CSC and financial management only. A set of by-laws cover the requirements for the Board of Directors. The roles within the BoD include: President, Vice President, Treasurer, Secretary.

The founding members of the Board of Directors was established by the Alaska Seafood Marketing Institute (ASMI) in 2020. Responsibility for the strategy and operations of the RFM program has been devolved to the CSC Management Board.

The CSC Management Board - The CSC Management Board provides oversight and strategic direction for the management of the RFM Program and specifically: Generate and maintain a Strategic Management Plan and Communications strategy for the RFM Program.

Provide advice, direction and guidance to the RFM Management Team and to Standards Committees, by way of meeting proceedings, strategic decisions and recommendations.

Provide an oversight to the Certification Body and Accreditation Board management and performance

Approve the RFM Quality Management System key changes and the appointment of Certification Bodies or Committees

ToR for the CSC Management Board are available.

Stakeholders are engaged throughout the development process.

- <https://rfmcertification.org/wp-content/uploads/2022/08/CSC-RFM-Job-Descriptions-2022-Final.pdf>
- CsC Management Board ToR
- https://rfmcertification.org/wp-content/uploads/2022/11/RFM-CSC-Board-ToR-versionNov22_Final.pdf
- CSC Management Board biographies
- https://rfmcertification.org/wp-content/uploads/2022/08/Certified-Seafood-Collaborative-Board-Bios_8_2022.pdf
- Fisheries committee - biographies
- https://rfmcertification.org/wp-content/uploads/2022/08/FSC-Master-Bio-List_Aug-2022.pdf
- QMS
 - Section 3.3
 - https://rfmcertification.org/wp-content/uploads/2022/11/QMS-V5.1-Nov-2022_2.pdf
- RFM Governance
 - <https://rfmcertification.org/about-rfm/governance/>
- RFM Quality Management System
 - Section 3.3
 - https://rfmcertification.org/wp-content/uploads/2022/08/QMS-Chapters-1-7_Final.pdf

A . 1 S C H E M E G O V E R N A N C E

A.1.03 Operating Procedures

The revised diagram shows the role of the main groups in the standards development process.

The QMS has been revised in line with revisions to the webpage.

- Stakeholder engagement webpage
 - <https://rfmcertification.org/stakeholder-involvement/consultations/>
- ToR – Unified Technical Advisory Committee (TAC)
 - <https://www.responsiblefisheries.is/certification/the-programme/technical-comittee>

A.1.04 Transparency

GSSI Component	Guidance
The Scheme Owner makes information freely available about the scheme's ownership, governance structure, the composition, operating procedures and responsibilities of its governance bodies, standard-setting procedures and standards.	<p>All applicable listed governance documents are easily accessible online, free or at cost of any printing and handling costs.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> - applicable documents posted on website, easy to find and free to download.
Conclusion	References
<p>All applicable listed governance documents are easily accessible online, free or at cost of any printing and handling costs.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> - the RFM website which is open access - all applicable documents posted on website, easy to find and free to download. If printed copies are offered – charges are reasonable to cover printing and handling. 	<ul style="list-style-type: none"> • Governance webpage <ul style="list-style-type: none"> • https://rfmcertification.org/about-rfm/governance/ • Procedure 10 – Standards development process <ul style="list-style-type: none"> • https://rfmcertification.org/wp-content/uploads/2022/11/Procedure-10-V1.1-CSC-Final-Nov-2022.pdf

A . 1 S C H E M E G O V E R N A N C E

A.1.04 Transparency

The RFM webpage on governance provides clarification around the governance groups, including the Board of Directors, CSC Management Board, and two advisory committees (Fisheries Standards and Unified CoC).

The Board of Directors is a subset of the CSC Management Board. It has responsibility for the legal operation of the CSC and financial management only. A set of by-laws cover the requirements for the Board of Directors. The roles within the BoD include: President, Vice President, Treasurer, Secretary.

The founding members of the Board of Directors was established by the Alaska Seafood Marketing Institute (ASMI) in 2020. Responsibility for the strategy and operations of the RFM program has been devolved to the CSC Management Board.

The CSC Management Board - The CSC Management Board provides oversight and strategic direction for the management of the RFM Program and specifically:

Generate and maintain a Strategic Management Plan and Communications strategy for the RFM Program.

Provide advice, direction and guidance to the RFM Management Team and to Standards Committees, by way of meeting proceedings, strategic decisions and recommendations.

Provide an oversight to the Certification Body and Accreditation Board management and performance

Approve the RFM Quality Management System key changes and the appointment of Certification Bodies or Committees

ToR for the CSC Management Board are available.

Stakeholders are engaged throughout the development process.

The revised diagram shows the role of the main groups in the standards development process.

The QMS has been revised in line with revisions to the webpage.

- RFM Governance and Quality Management System
 - <https://rfmcertification.org/about-rfm/quality-management/>
- RFM Procedure 5
 - https://rfmcertification.org/wp-content/uploads/2022/08/Procedure-5-CSC_Final.pdf
- RFM Quality Management System
 - Section 3
 - https://rfmcertification.org/wp-content/uploads/2022/08/QMS-Chapters-1-7_Final.pdf
- RFM website
 - <https://rfmcertification.org/>

A . 1 S C H E M E G O V E R N A N C E

A.1.04 Transparency

In terms of the development of standards, Procedure 10 provides details for this. Section 6 states

The stages in the preparation of new or updated CSC RFM standard or revision is listed below. The CSC RFM Program Manager facilitates the flow of information throughout the development process.

1. Preliminary draft
2. Committee draft or drafts
3. Public comment draft
4. Final committee draft
5. Committee review
6. CSC Management Board approval

A.1.05 Scheme Scope

GSSI Component	Guidance
The Scheme Owner has a defined scope for certification under its standard.	<p>The Scheme Owner clearly defines the scope that the standard covers, for example which species, production systems/gear type, geographical locations, company structures (single units, groupings of sites/boats, smallholder groups/small-scale fisheries, subcontractors, product categories, certifiable units in the chain of custody etc.).</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> - explicit scope definition in standards, certification methodology/requirements, objectives. - contracts with accreditation bodies, certification bodies and/or certified operations
Conclusion	References
The RFM Program is in alignment because the remit and scope of the Standard specifically includes the following;	<ul style="list-style-type: none"> • RFM Fisheries Standard landing page • https://rfmcertification.org/fisheries-standard/version-2-1/

A . 1 S C H E M E G O V E R N A N C E

A.1.05 Scheme Scope

“To establish and maintain a program that provides for independent third-party certification of Responsible Fisheries Management, including enhancement practices (but excluding full cycle aquaculture), up to the point of landing, with the main objective being the biological sustainability of the “stock under consideration”, with consideration for conservation, biodiversity and ecosystem integrity; and due regard to social responsibility and the economic viability of the fishery.”

This information is provided in the RFM QMS, which is available on the RFM website.

The RFM Fisheries Standard Version 2.1 (Issued Sept 2020) is a Reissue of Version 2.0 Reflecting That the Scope is Changing from Alaska Only Fisheries to North American Fisheries Operating Within the U.S. and Canadian 200 NM EEZ. A period of 3 years has been identified for fisheries to adopt V2.1.

Every organization that takes ownership of the certified seafood, from the point of first handling after the seafood has been landed, until it is processed into the final consumer product, will need to be certified to the Chain of Custody Standard. The types of companies that will be required to apply are:

Vessel Groups

Primary Processor/Packers

Secondary Processors/Canners/Manufacturers

Distributors/Wholesalers

Retailers/Food Service Operations

- RFM Program CoC landing page
 - <https://rfmcertification.org/chain-of-custody/why-coc/>
- RFM Quality Management System
 - https://rfmcertification.org/wp-content/uploads/2022/08/QMS-Chapters-1-7_Final.pdf
- The RFM Fisheries Standard V 2.1
- Unified Responsible Fisheries Management (RFM) Chain of Custody Standard

A.1.06 Scheme Objectives

GSSI Component	Guidance
The Scheme Owner has defined objectives for its	Objectives for the scheme are defined and documented. The defined objectives cover all environmental resources covered in

A . 1 S C H E M E G O V E R N A N C E

A.1.06 Scheme Objectives

scheme that aim for responsible use of the resource and has publicly available performance indicators related to scheme objectives.	<p>the standards; this would normally be for example fish populations, habitats and ecosystems, water, possibly energy, endangered species and biodiversity within the impact zone. Indirect use of resources for e.g. feed production may also be addressed. For each objective and associated resources, performance indicators are defined, documented and publicly available.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> - standard document with objectives and thresholds.
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Conclusion	References
<p>Section 2.2 of the QMS includes the key performance indicators for the RFM program.</p> <p>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.</p> <p>The RFM Certification Program is committed to the following objectives:</p> <ul style="list-style-type: none"> - To be recognized as a leader in Responsible Fisheries Management certification. - To facilitate and maintain the RFM Standards Program under ISO 17065 accreditation. - To facilitate and maintain GSSI benchmark approval for the RFM Certification Program. - To provide open, effective communication with seafood customers, interested parties, and committees. - To provide systematic validation and control of RFM quality processes; and - Certified clients are to meet the criteria including objectives detailed in the publicly available RFM standards that aim for responsible use of the resource; and - 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, and. 	<ul style="list-style-type: none"> • QMS, RFM Certification Program, Version 5, • https://rfmcertification.org/wp-content/uploads/2022/08/QMS-Chapters-1-7_Final.pdf • Quality Management System, RFM Version 5.1 • Section 2.2 • https://rfmcertification.org/wp-content/uploads/2022/11/QMS-V5.1-Nov-2022_2.pdf • RFM Remit, Policy, Objectives on webpage • https://rfmcertification.org/

A . 1 S C H E M E G O V E R N A N C E

A.1.06 Scheme Objectives

- To provide a system for assessing the supply chain traceability and product integrity that voluntary submit to a Chain of Custody Audit in advance of any claim being made on the origin of seafood product that is traceable back to an RFM certificated fishery.

A.1.07 Non-discrimination

GSSI Component	Guidance
The Scheme Owner ensures that all types of fishery/aquaculture operations within the scope of its scheme can apply for certification, regardless of their scale, size or management arrangements, and has not set an upper limit on the number of operations that can be certified.	<p>The Scheme Owner application process ensures equal access within the defined standard scope whether directly, sub-contractors or outsourcing (i.e. to certification body).</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> - application process selection criteria do not discriminate on factors such as size, scale, management, minimum number of operators. - review declined applications are due to other non-discriminatory issues (i.e. incomplete, out of scope)
Conclusion	References
<p>The RFM Program is in alignment because application is open to all fisheries and companies within the scope of the scheme.</p> <p>The CSC Program is open to application for all types of fisheries.</p> <p>The application processes are included respectively in Procedure 2 (fisheries)</p>	<ul style="list-style-type: none"> • Application form - DNV • Application procedure- CB (NSF/GT) • Certification bodies <ul style="list-style-type: none"> • https://rfmcertification.org/fisheries-standard/auditor-contact-list/ • How it works webpage <ul style="list-style-type: none"> • https://rfmcertification.org/about-rfm/how-it-works/ • OP C5 RFM Manual • QMS, RFM Certification Program, Version 5, <ul style="list-style-type: none"> • https://rfmcertification.org/wp-content/uploads/2022/08/QMS-Chapters-1-7_Final.pdf • Resources

A . 1 S C H E M E G O V E R N A N C E

A.1.07 Non-discrimination

and Procedure 4 (Unified CoC), both of which are online.

Certification bodies provide application forms for applicants to complete and use procedures for handling applications. Examples of an application form and application procedure are provided from a CB (DNV)

- <https://rfmcertification.org/rfm-news/>
- RFM Procedure 2, Version 6.1: Application to Certification Procedures for the RFM Fishery Standard,
- https://rfmcertification.org/wp-content/uploads/2022/11/Procedure-2-CSC_Final-Nov-2022.pdf
- RFM Procedure 4 Version 5.1: Application to Certification Procedures for the RFM Unified Chain of Custody Standard
- https://rfmcertification.org/wp-content/uploads/2022/11/Procedure-4-CSC_Final-Nov-2022.pdf

A.1.08 Non-discrimination

GSSI Component	Guidance
The Scheme Owner does not have mandatory requirements that require a fishery / aquaculture operation to be certified in order to access any markets.	Application selection process and certification methodology/ requirements do not include mandatory requirements for access to markets. Absence of such requirements indicates alignment.
Conclusion	References
<p>The RFM Program is in alignment because it is voluntary and there are no requirements for any fishery to be certified in order to access markets.</p> <p>The Program operates in accordance with best practice including among others; WTO Technical Barrier to Trade Agreement, Annex 3 Code of Practice; ISO Guide 59 Code of Good Practice for Standardization; ISEAL Code of Good Practice for Social and Environmental Standards; FAO Eco-labeling Guidelines of Fish and Fishery Products (Marine/Inland) and this GSSI benchmarking tool.</p>	<ul style="list-style-type: none"> • CB application procedure (DNV) • CB application procedure (NSF-GT) • RFM Procedure 2, Version 6.1: Application to Certification Procedures for the RFM Fishery Standard

A . 1 S C H E M E G O V E R N A N C E

A.1.08 Non-discrimination

Further clarification on application procedures

The CSC Program is open to application for all types of fisheries.

The application processes are included respectively in QP2 (fisheries) and QP4 (Unified CoC), both of which are online.

Certification bodies provide application forms for applicants to complete and use procedures for handling applications. Examples of an application form and application procedure are provided from one CB (DNV)

- https://rfmcertification.org/wp-content/uploads/2022/11/Procedure-2-CSC_Final-Nov-2022.pdf
- RFM Procedure 4 Version 5.1: Application to Certification Procedures for the RFM Unified Chain of Custody Standard
- https://rfmcertification.org/wp-content/uploads/2022/11/Procedure-4-CSC_Final-Nov-2022.pdf
- RFM QMS V5 Sept 2020
- https://rfmcertification.org/wp-content/uploads/2022/08/QMS-Chapters-1-7_Final.pdf

A.1.09 Internal Review

GSSI Component	Guidance
The Scheme Owner undertakes a fully documented annual management review of scheme performance, including its assurance program, and the performance of certification and accreditation bodies. The results of the review are used to revise its operating procedures and practices, where necessary.	System exists for an annual documented management review that covers scheme performance, assurance program, accreditation bodies and certification bodies as applicable. A documented system to use the results of the review to revise operating procedures and systems is available.
Conclusion	References
The RFM Program is in alignment because it is reviewed on an annual basis to ensure its relevance and to verify that it continues to meet the demands of the global market place.	<ul style="list-style-type: none"> • 2020 RFM Program Internal Annual Program Review Report December 2020

A . 1 S C H E M E G O V E R N A N C E

A.1.09 Internal Review

The review includes findings, cause analysis, preventive and corrective actions with deadlines and responsibilities as applicable. The actions could result in revision of relevant operating procedures.

Annual reviews are also undertaken of the CBs performance.

Procedure 5 provides details for the management of certification bodies.

Section 4 states:

The CSC Program Manager, shall ensure that a master file of all documents is maintained, and document control will be verified through an annual review.

Key Records include:

Certification Body Management

- a) CB Approval Agreements
- b) CB Quality Management Systems
- c) CB Templates
- d) CB Review Reports
- e) CB Assessors

- https://cdn.rfmcertification.org/wp-content/uploads/2021/07/2020-Internal-Review-RFM-Program-Dec2020_FINAL-21.12.2020.pdf
- 2021 Responsible Fisheries Management (RFM) Program Internal Annual Program Review Report December 2021
- <https://cdn.rfmcertification.org/wp-content/uploads/2021/12/2021-Internal-Review-Alaska-RFM-Program-FINAL-Dec-2021-121421.pdf>
- RFM Governance
- <https://rfmcertification.org/about-rfm/governance/>
- RFM Procedure 5 Version 5.1: Program Administration
- Section 4
- https://rfmcertification.org/wp-content/uploads/2022/11/Procedure-5-V5.1-Nov-2022_2.pdf

A . 2 S C H E M E M A N A G E M E N T

A.2 SCHEME MANAGEMENT

A.2.01 Logo Use and Claims		
GSSI Component	Guidance	
<p>The Scheme Owner has a publicly available policy governing use of symbols, logos and claims. This policy includes the provision of written authorizations or licenses to use the scheme's mark/claim/logo only when the facility and products have been certified to the relevant standard.</p> <p>Any misleading use or statement by the certified entity regarding the status or scope of its certification, shall be prohibited.</p>	<p>Scheme Owner has a policy that covers use of symbols, logos and claims if applicable to its system. The policy is public, easily accessible and available in languages appropriate to geographic scope.</p> <p>Contracts or formal agreements with the certified entity specify legal responsibility for the use of the scheme's mark/claim/logo only when the facility and/or product are certified.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> - publicly available Logo Use and Claim statement which is explicitly referenced in formal arrangement with certified entity. - other examples include direct logo agreements, licensing or membership agreements with the Scheme Owner or its commercial partner or indirect contracts/agreements through the certification body. - in the latter case the requirements to include this in contracts/ agreements should be outlined in certification requirements/ methodologies or similar contract/agreement between the Scheme Owner and the certification body. 	
Conclusion	References	
<p>The RFM Program is in alignment because publicly available information is available for seal managing and monitoring procedure is in place.</p> <p>The Certified Sustainable Seafood Collaborative RFM Logo is available for those who satisfy the Chain of Custody requirements and would like to</p>	<ul style="list-style-type: none"> • Brand Identify Guidelines • https://cdn.rfmcertification.org/wp-content/uploads/2021/07/RFM-BrandGuidelines_11-2020-3.pdf • Logo use webpage • https://rfmcertification.org/chain-of-custody/logo/ 	

A . 2 S C H E M E M A N A G E M E N T

A.2.01 Logo Use and Claims

demonstrate traceability and make a certification claim. There is no logo licensing fee for using the RFM logo.

Policy, Application and Rules, submission process are available on the CSC website.

- RFM Procedure 6 Certified Sustainable RFM Logo Management and Market Surveillance,
- https://rfmcertification.org/wp-content/uploads/2022/08/Procedure-6-CSC_Final.pdf
- Terms and Conditions for Use of the Certified Sustainable Alaska RFM Logo and Claims
- Clause 1, 10
- https://cdn.rfmcertification.org/wp-content/uploads/2021/06/AK-RFM-Logo-Terms-and-Conditions_July2020.pdf

A.2.02 Logo Use and Claims

GSSI Component	Guidance	References
Through the claims policy, the Scheme Owner ensures copyright is protected and that symbols, logos and claims are only applied to activities that are within the scope of certification, do not overstate or mislead users relative to the defined scope, and are relevant to that scope.	<p>Claims policy (see A.2.01), contracts and MoUs ensure that logo use and claims are copyright protected and are restricted to activities within the scope of certification. This includes symbols, logos and claims on and off product, such as marketing materials, consumer brochures and the internet.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> - legal registration of logos and seals with applicable agents. - claims policy covers clear scope for on and off product use, claims and statements including policy for misuse. - contractual relationships specify explicitly adherence to claims policy. - records of applications for use of claims, records of complaints or violations. 	
Conclusion	The RFM Program is in alignment because a seal managing, and monitoring procedure is in place and available from the CSC website.	<ul style="list-style-type: none"> • RFM Procedure 6 Certified Sustainable RFM Logo Management and Market Surveillance,

A . 2 S C H E M E M A N A G E M E N T

A.2.02 Logo Use and Claims

All uses of the Certified Responsible Fisheries Seal and/or claim on packaging and marketing materials (such as advertisements, packaging, web pages, collateral materials, POS materials, and video footage) must be reviewed and approved by CSC/ASMI in advance of printing and/ or publishing. These are regularly monitored to ensure scope relevance.

As per Procedure 6 Section 2.2.2 On a quarterly basis, through contracted market surveillance assessors or OMRs, the CSC Board Chair, or designee, will check retail establishments in market areas where the CSC RFM logo is being used to ensure that the use is compliant with the T&Cs. The OMRs or assessor will randomly check products in relevant retail stores and make a report on the correct or incorrect use of the RFM logo to the CSC Program Manager

Market assessors or OMRs routinely check use of marks in markets.

Example can be given of recent OMR checking communication.

Use of marks are discussed annually at All Hands Meeting, November each year.

ASMI runs programs in 9 regions, covering 40 countries, these are staffed with individuals trained on the RFM including use of RFM logo including abuse, fraud, etc – review internal Market Surveillance report. When a company has received their initial RFM CoC certificate, they are sent info on the opportunities, guidelines, contract review, internal emails and communications

- Section 2.2.2
- https://rfmcertification.org/wp-content/uploads/2022/11/Procedure-6-V5.1-Nov-2022_2.pdf
- Terms and Conditions for Use of the Certified Sustainable Alaska RFM Logo and Claims
- https://cdn.rfmcertification.org/wp-content/uploads/2021/06/AK-RFM-Logo-Terms-and-Conditions_July2020.pdf

A.2.03 Logo Use and Claims

GSSI Component	Guidance
<p>The Scheme Owner requires certificates to include, at a minimum:</p> <ul style="list-style-type: none"> - the identification of the Scheme Owner; - identification of the accreditation body; 	<p>The issuer of the certificate ensures that minimum information enables identification and contact information of assurance process parties (accreditation body, Scheme Owner and certification body), unique name and address of certified entity, date and validity, scope and signature of issuing officer.</p>

A . 2 S C H E M E M A N A G E M E N T

A.2.03 Logo Use and Claims

- the name and address of the certification body;
- the name and address of the certification holder;
- the effective date of issue of the certificate;
- scope of certification
- the term for which the certification is valid;
- signature of the issuing officer.

Examples of evidence for scheme alignment:

- mandatory normative documents such as certification requirements/methodologies with certification bodies that cover all points listed.
- mandatory certificate template includes all points listed.
- review examples of certificates.

Conclusion

The RFM Program is in alignment because Procedures 2 and 4 ensure that the Certificate content criteria are consistent and in alignment with the GSSI requirements. On review the certificates were not out of alignment with GSSI criteria. However, the revision of the procedures will help maintain future consistency

Procedure 2 section 3.25 states

The certificate shall specify the following:

Name and Address of Certification Body.

Name of Accreditation Body (when applicable).

Name of Standard Holder.

Applicant's name and address.

Unit of certification.

Management authorities.

Species, Geographic region and Gear types.

Issue date (the certification decision date).

Surveillance date (annual).

Expiration date (five years less a day from the issue date);

Any corrective action plans and timescales for resolution where applicable (annexed to the certificate); and

References

- QMS, RFM Certification Program, Version 5,
 - Section 4.4.3
 - https://rfmcertification.org/wp-content/uploads/2022/11/QMS-V5.1-Nov-2022_2.pdf
- Responsible Fisheries Management Certificate
 - Alaska Atka Mackerel and Rockfish Fishery example certificate
 - https://cdn.rfmcertification.org/wp-content/uploads/2021/06/RFM-Certificate_Mackerel_Rockfish_2021_03_10.pdf
- RFM Fishery Certificate Example
 - US Alaska Salmon Commercial Fisheries
 - <https://cdn.rfmcertification.org/wp-content/uploads/2021/06/Form-17-RFM-Alaska-salmon-Certificate-08-March-2021.pdf>
- RFM Procedure 2, Version 6.1: Application to Certification Procedures for the RFM Fishery Standard,

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A.2.03 Logo Use and Claims

List of fishery participants within the client group.

Signature of Certificate issuing Officer

Procedure 4, section 13 states: The certificate will be in the standard's approved format and include following:

Certification Body's name, address and accreditation.

Accreditation Body's name (when applicable);

Standard Holder's name.

Applicant name.

Applicant mailing address.

Chain of Custody certification standard and scope.

Seafood product categories covered by the certificate, stating the fish species.

Assessment date.

Certification Issue date.

Certification Expiry date.

Chain of Custody Certificate Number (Eg: COCALAXX date); and

Authorizing signature.

- Section 3.25
- https://rfmcertification.org/wp-content/uploads/2022/11/Procedure-2-CSC_Final-Nov-2022.pdf
- RFM Procedure 4 Version 5.1: Application to Certification Procedures for the RFM Unified Chain of Custody Standard,
 - Section 13
 - https://rfmcertification.org/wp-content/uploads/2022/11/Procedure-4-CSC_Final-Nov-2022.pdf

A.2.04 Logo Use and Claims

GSSI Component	Guidance
Where a seafood ingredient can be certified, the Scheme Owner requires that at least 95% of the total seafood ingredient within a product is of certified origin in order for the	<p>The Scheme Owner specifies minimum percentages for use of logo and claims in mixed products. This states that at least 95% of the total seafood ingredient that can be certified, for unqualified claims and for lower percentages, a qualifying statement of the percentage must be used in conjunction with the logo or claim.</p> <p>Examples of evidence for scheme alignment:</p>

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A.2.04 Logo Use and Claims

scheme's logo or certification mark to be used. Where there is less than 95%, the scheme requires that the percentage must be stated and the logo or certification mark cannot be used.

- normative documents such as scope definition, certification requirements/ methodologies or other agreements between the Scheme Owner and certification body that define these percentage claims.
- logo use and claims policy which is explicitly referenced in formal contracts and agreements with certification bodies and/or certified entities.
- review examples of issued certificates where these are public or product information in online databases of certified products where these are available.
- if the Scheme Owner does not allow mixed product, then this Essential Component is aligned.

Conclusion

The RFM Program is in alignment because the Coc Standard states in Clause 2.3:
Where certified and non-certified seafood is mixed the final product is not eligible to carry the RFM certification mark unless: compound products, including ready meals, may contain non-certified seafood ingredients within the final product where the non – certified seafood ingredients shall be 5% or less by weight of the total seafood ingredient in the final product.

The CB checks the client records for types of products including compound products at the time of the CoC audit. The scope of the audit will be tailored to the products under assessment.

Procedure 4,

Section 5 states - In the event that additional assessment requirements arise, such as checking compliance with product specifications, a complaint or appeal investigation, the scope of the applicant's assessment plan can be modified to meet these additional requirements.

The logo Terms and Conditions state in point 4:

Licensee shall not use the Certified Sustainable Alaska RFM logo or approved Alaska RFM claims in connection with combined or prepared food products unless each kind of fish or seafood in such products is from a certified Alaska fishery and is from a fully certified supply chain.

References

- Logo Terms and Conditions
 - Point 4
 - https://rfmcertification.org/wp-content/uploads/2021/06/AK-RFM-Logo-Terms-and-Conditions_July2020.pdf
- RFM Procedure 4 Version 5.1: Application to Certification Procedures for the RFM Unified Chain of Custody Standard,
 - Section 5
 - https://rfmcertification.org/wp-content/uploads/2022/11/Procedure-4-CSC_Final-Nov-2022.pdf
- Unified Responsible Fisheries Management (RFM) Chain of Custody Standard Issue 2.5 Dec 2021
 - Clause 2.3

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A.2.04 Logo Use and Claims

- https://rfmcertification.org/wp-content/uploads/2022/02/Unified-RFM-CoC-V2.5_Final_Website-Posting.pdf

A . 3 S T A N D A R D S E T T I N G A N D M A I N T E N A N C E

A.3 STANDARD SETTING AND MAINTENANCE

A.3.01 Standard Setting Body		
GSSI Component	Guidance	
<p>The Scheme Owner shall have a process and governance structure in place for standard setting, reviewing, revising, assessing, verifying and approving.</p> <p>The process shall be carried out with the participation of technically competent persons (e.g. independent experts, and open to suitably qualified representatives of all key stakeholders).</p> <p>The information about the process and organization for standard development and revision shall be made publicly available. It is the Scheme Owners responsibility to ensure a balanced participation by stakeholders.</p>	<p>The Scheme Owner clearly identifies the responsible person for assigning the management of the standard setting process. In addition, the procedure, organizational chart or related TORs/contracts with external bodies identifies where each of the tasks (setting, reviewing, revising, assessing, verifying and approving standards) are assigned to. This documentation clearly indicates where the overall responsibility for the standard setting process lies. Procedures defining the process of standard development and revision are easily available for the public, such as online, in appropriate languages.</p>	
Conclusion	References	
<p>The RFM Program is in alignment because the RFM website and QMS provides the ToR, Constitution, and Rules of Procedure for Standard setting.</p> <p>CSC Management Board appoints and maintains a Fisheries Standard Committee for the implementation and review of the Standards and the Scoring Guidance for the RFM Program</p> <p>The Committee is an objective based group, representative of fishery science, management and environment. Representation is sought from both, fishery specific and wider fishery management and stakeholder interests. Committee members, biographies are available at</p>	<ul style="list-style-type: none"> • Governance • https://rfmcertification.org/about-rfm/governance/ • QMS, RFM Certification Program, Version 5.1, N • Section 3.3 • https://rfmcertification.org/wp-content/uploads/2022/11/QMS-V5.1-Nov-2022_2.pdf 	

A . 3 S T A N D A R D S E T T I N G A N D M A I N T E N A N C E

A.3.01 Standard Setting Body

CSC website and Terms of Reference for constitution, procedures, confidentiality and conflict of interest review procedures, complaints and attestation by members.

The RFM webpage on governance provides clarification around the governance groups, including the Board of Directors, CSC Management Board, and two advisory committees (Fisheries Standards and Unified CoC).

The Board of Directors is a subset of the CSC Management Board. It has responsibility for the legal operation of the CSC and financial management only. A set of by-laws cover the requirements for the Board of Directors. The roles within the BoD include: President, Vice President, Treasurer, Secretary.

The founding members of the Board of Directors was established by the Alaska Marketing Institute (ASMI) in 2020. Responsibility for the strategy and operations of the RFM program has been devolved to the CSC Management Board.

The CSC Management Board - The CSC Management Board provides oversight and strategic direction for the management of the RFM Program and specifically:

Generate and maintain a Strategic Management Plan and Communications strategy for the RFM Program;

Provide advice, direction and guidance to the RFM Management Team and to Standards Committees, by way of meeting proceedings, strategic decisions and recommendations.

Provide an oversight to the Certification Body and Accreditation Board management and performance

Approve the RFM Quality Management System key changes and the appointment of Certification Bodies or Committees

ToR for the CSC Management Board are available.

- RFM Procedure 10, Version 1.1: CSC RFM Standard Development Procedure
- <https://rfmcertification.org/wp-content/uploads/2022/11/Procedure-10-V1.1-CSC-Final-Nov-2022.pdf>
- Stakeholder engagement webpage
- <https://rfmcertification.org/stakeholder-involvement/>
- Terms of Reference for Fisheries Standard Committee (FSC)
- https://rfmcertification.org/wp-content/uploads/2022/09/FSC-TOR_Sept-2022_Final.pdf

A . 3 S T A N D A R D S E T T I N G A N D M A I N T E N A N C E

A.3.01 Standard Setting Body

Stakeholders are engaged throughout the development process.
The revised diagram shows the role of the main groups in the standards development process.
The QMS has been revised in line with revisions to the webpage.

A.3.02 Standard Setting Body

GSSI Component	Guidance
The Scheme Owner identifies a central point of contact for standards-related enquiries and for submission of comments. The Scheme Owner makes contact information for this contact point readily available on its website.	<p>Contact details for standard related enquiries and comments are easily available for the public, including online. This can be the same as a general contact point, but should explicitly identify standard related scope.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> - review website and verify that point of contact responds to enquiries. - review past enquiries and submitted comments
Conclusion	References
<p>The RFM Program is in alignment because the CSC Program manager is identified as central point of contact for standards-related enquiries: https://rfmcertification.org/about-rfm/governance/</p> <p>There are two pages online which refer to how people can contact the RFM team; The main comments page includes a comments form and states "Contact the RFM team with any comments or questions about the program, using the comment form below".</p> <p>In addition, the Governance page has a new title "OVERVIEW OF OWNERSHIP, MANAGEMENT, STANDARD DEVELOPMENT PROCESS, AND BOARD & COMMITTEES"</p> <p>At the top of this page is a section about the scheme owner and a list of the RFM team members, including names and contact details. This states:</p>	<ul style="list-style-type: none"> • Comments, Appeals and Complaints landing page • https://rfmcertification.org/stakeholder-involvement/appeals-and-complaints/ • Consultation Process for Stakeholders • https://rfmcertification.org/stakeholder-involvement/consultations/ • Resources page • https://rfmcertification.org/rfm-news/ • RFM Procedure 7 Version 5: RFM Complaints and Appeals Process

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A.3.02 Standard Setting Body

"Since 2020, the RFM program owner is the Certified Seafood Collaborative (CSC), which is a non-profit organization registered in Alaska. The day to day running of the Program is undertaken by the RFM Team and expert consultants who manage the operations of the program and work with the various governance committees and the CSC Board on RFM matters.

RFM Team members are:

Jeff Regnart, RFM Program Manager. Jeff spearheads the RFM team. Please contact him at jrregnart@gmail.com

Susan Marks, RFM, Chain of Custody, and Sustainability Advisor. Please contact her at smarks@alaskaseafood.org

Tricia Sanguinetti, RFM and Sustainability Marketing Consultant. Please contact her at triciasanguinetti@gmail.com"

There is also a separate clearly identifiable (Stakeholder Process) link with comments, appeals and complaints process and submission form by stakeholders and a consultation process used during the Standards review procedure.

- https://rfmcertification.org/wp-content/uploads/2022/08/Procedure-7-CSC_Final.pdf

A.3.03 Decision Making Process

GSSI Component	Guidance
<p>The Scheme Owner strives for consensus decisions on the content of the standard.</p> <p>Where consensus cannot be achieved, the Scheme Owner defines criteria in advance to determine when alternative decision-making</p>	<p>A mechanism is in place to assure a consensus decision is found where possible. In addition, the mechanism describes how decisions shall be made when a consensus is not possible. The mechanism assures that stakeholders are informed about this mechanism.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> - internal procedures and/or quality handbook for standard setting and maintenance outlines decision making.

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A.3.03 Decision Making Process

procedures should come into effect and what the decision-making thresholds will be.	- meeting minutes/email correspondence. Standard setting archives and draft standards and meeting minutes could verify that this mechanism was implemented during previous decision-making.
Conclusion	References
<p>The RFM Program is in alignment because Terms of Reference describe decision making For key decisions on Standards and interpretation, the Committee shall strive for consensus. In the event of a vote motions will carry with a two-thirds majority. Each member shall have one vote. Each member shall have one vote. In the event of a tied vote the Chairperson or person presiding shall instruct that all voting members not present be notified of the issue and requested to advise their decision. Should this fail to result in a clear majority either for or against the proposal, the proposal shall be withdrawn and status quo prevails</p> <p>The outcome of the Standard Review will be registered in the minutes and where changes to the Standards are recommended and agreed by the FSC / CCC, CSC Program Manager will ensure that the re-edited Standards Document is changed in accordance with the recommendations.</p> <p>Agreement by the FSC CCC will be by a consensus vote. The re-drafted Standard will be presented to the RFM Board for approval. If there is not an approval from the Board the Standard will go back to the Committee for further consideration.</p>	<ul style="list-style-type: none"> • Procedure 10 Standard Development Procedure • https://rfmcertification.org/wp-content/uploads/2022/08/Procedure-10-CSC_Final.pdf • Terms of Reference for Fisheries Standard Committee (FSC) • https://cdn.rfmcertification.org/wp-content/uploads/2021/06/FSC-TOR_June2016.pdf

A.3.04 Complaints

GSSI Component	Guidance
The Scheme Owner has a transparent process to assess and handle complaints based	Complaints procedure is documented and clearly outlines steps, timelines and responsibilities to address and resolve complaints.

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A.3.04 Complaints

on a publicly available procedure for resolving complaints related to governance, scheme management, executive functions and standard setting. Decisions taken on complaints are disclosed at least to the affected parties.

The process for submitting a complaint – how and to whom – is public and easily understood. A process is in place to identify when and if the complaint is addressed and resolved.

Examples of evidence for scheme alignment:

- easily found complaint process and submission form online.
- documentation of existing complaints and their resolution.
- possibly request accreditation and certification bodies for previous submissions of complaints and resolution.
- request and cross check with any complaints from stakeholders.

Conclusion

The RFM Program is in alignment because a complaint resolution mechanism is described in the RFM QMS.

If a Client, or Applicant or external party, wishes to complain against any decision of a CB under these Rules, they shall, within 14 days of being officially informed of the decision, give notice to the relevant Certification Body and the CSC Technical Program Director (in writing) of their wish to appeal against the decision and give the grounds for doing so.

The Certification Body will instigate its own Complaints Review Process and inform the Complainant. If the Complainant is still not satisfied with the outcome they have the right to raise the issue with the Program Appeals Committee.

decisions taken on complaints are publicly available on the CSC Website.

A complaint register is maintained by the RFM team. Complaints and resolution actions are included on the log.

To date only one complaint has been received. A copy of the complaint log and details of the complaint received are provided in the evidence

References

- Complaints log
- RFM Procedure 7: RFM Complaints and Appeals Process
- https://rfmcertification.org/wp-content/uploads/2022/11/Procedure-7-V5.1-Nov-2022_2.pdf
- Submission Form
- <https://rfmcertification.org/stakeholder-involvement/appeals-and-complaints/>

A . 3 S T A N D A R D S E T T I N G A N D M A I N T E N A N C E

A.3.05 Standards Review and Revision

GSSI Component	Guidance
The Scheme Owner reviews standards at least every five years for continued relevance and for effectiveness in meeting their stated objectives and, if necessary, revises them in a timely manner.	<p>The Scheme Owner has a process in place for reviewing all standards to ensure continued relevance and meeting stated objectives. Relevance can include market uptake, stakeholder scope and support. Outcome and assessment reports can identify progress towards objectives. Review should be at least every five years after the publication of the current version.</p> <p>Example of evidence of alignment:</p> <ul style="list-style-type: none"> - internal procedure, quality handbook, public work program. - monitoring and evaluation system. - public comments and consideration of reports for standard revisions.
Conclusion	References
<p>The RFM Program is in alignment because all Program Standards will be subject to a formal review by the appointed Technical Committee:</p> <p>RFM QMS Section 3.1: As part of the FAO-based concept of the RFM Standard, the 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.</p> <p>There have been no complaints to date.</p>	<ul style="list-style-type: none"> • QMS, RFM Certification Program, Version 5, September 2020 • Section 3.1 • https://rfmcertification.org/wp-content/uploads/2022/08/QMS-Chapters-1-7_Final.pdf • RFM Fisheries Standard Committee Terms of Reference • https://cdn.rfmcertification.org/wp-content/uploads/2021/06/FSC-TOR_June2016.pdf

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A.3.06 Standards Review and Revision

GSSI Component	Guidance
The Scheme Owner allows for comments on the standard to be submitted by any interested party at any time and considers them during the subsequent standards revision process.	<p>The Scheme Owner has a permanent publicly available point of contact defined online for the submission of comments on the standard. This is not just during the development or revision process.</p> <p>A general point of contact online is acceptable for small schemes, as long as it explicitly states that all stakeholders can submit comments on the standard at any time. All comments on standards are considered in subsequent revision process.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> - scheme's website with form for submitting comments on standards. - internal procedure, quality handbook describing the receiving, filing and incorporation of submissions during the subsequent revision process. <p>Review ongoing submissions by interested parties on file.</p>
Conclusion	References
<p>The RFM Program is in alignment because the central point of contact for standards-related comments is the CSC Program Manager, supported by the RFM website, where a contact form is provided.</p> <p>The form can be completed and submitted online or downloaded for completion in hard copy. Comments on the RFM standard may be submitted by any interested party at any time and are considered during the subsequent standards revision process by the CCC.</p> <p>Stakeholder Input Applicable to the Standard Owner/CSC</p> <p>Comments related to RFM Standards or RFM Program Management go to the Standard owner, the Certified Seafood Collaborative, by submitting online in the Comments, Appeals and Complaints section. CSC has planned Official Public Comment Periods for the Standards;</p>	<ul style="list-style-type: none"> • Governance webpage • https://rfmcertification.org/about-rfm/governance/ • QMS, RFM Certification Program, Version 5, September 2020 • Clause 1.4 • https://rfmcertification.org/wp-content/uploads/2022/11/QMS-V5.1-Nov-2022_2.pdf • Stakeholder Input Applicable to the Standard Owner/CSC

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A.3.06 Standards Review and Revision

however, Stakeholders are welcome to submit information to CSC at any time about the Standard or Program

Management. The information will be reviewed for eligibility and forwarded to relevant parties.

The CSC Program Manager is responsible for collating the comments received and presenting these comments to the next CCC for discussion and resolution.

The CSC Program Manager is also responsible for responding to the parties who made submissions in the Open Comment Period either on the progress and/or the response to their submissions. The Sustainability Director will hold all comments on file as well as a record of the CCC Findings.

Comments were seen to be held on file and considered at the Standard Review.

The webpage content has been updated and includes;

COMMENTS, APPEALS AND COMPLAINTS

Contact the RFM team with any comments or questions about the program, using the comment form below.

If you wish to appeal a decision or make a complaint, please read the RFM Appeals and Complaints Procedure before contacting us using the comment form.

In addition, the Governance page has a new title "OVERVIEW OF OWNERSHIP, MANAGEMENT, STANDARD DEVELOPMENT PROCESS, AND BOARD & COMMITTEES"

At the top of this page is a section about the scheme owner and a list of the RFM team members, including names and contact details. This states:

"Since 2020, the RFM program owner is the Certified Seafood Collaborative (CSC), which is a non-profit organization registered in Alaska. The day to day running of the Program is undertaken by

- <https://rfmcertification.org/stakeholder-involvement/>
- Stakeholder process - Consultations
- <https://rfmcertification.org/stakeholder-involvement/consultations/>

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A.3.06 Standards Review and Revision

the RFM Team and expert consultants who manage the operations of the program and work with the various governance committees and the CSC Board on RFM matters.

RFM Team members are:

Jeff Regnart, RFM Program Manager. Jeff spearheads the RFM team. Please contact him at jrregnart@gmail.com

Susan Marks, RFM, Chain of Custody, and Sustainability Advisor. Please contact her at smarks@alaskaseafood.org

Tricia Sanguinetti, RFM and Sustainability Marketing Consultant. Please contact her at triciasanguinetti@gmail.com"

A.3.07 Record Keeping

GSSI Component

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

- policies and procedures guiding the standard setting activity;
- lists of stakeholders contacted;
- interested parties involved at each stage of the process;
- comments received and a synopsis of how those comments were taken into account; and
- all drafts and final versions of the standard.

Guidance

The Scheme Owner has a mechanism in place to assure all records outlined remain on file for at least one full standards revision period.

Examples of evidence for scheme alignment:

- internal procedure, quality handbook describing records to be kept, document and retention policy.

Review the full range of records for the most previous standard development and revision process.

Conclusion

The RFM Program is in alignment because all records remain on file.

References

- Consultation Archives and RDM Comments Review Process

A . 3 S T A N D A R D S E T T I N G A N D M A I N T E N A N C E

A.3.07 Record Keeping

Records for the RFM Standard V1.2, V1.3, V.2.0 and V2.1 Development and the CoC Standard V2.3 and V2.4 and the Unified RFM Chain of Custody Version 2.5 (effective Jan 2022) are retained in the Seattle office and in previous audits were available for verification.

Section 3.2 QMS:

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:

Policies and procedures guiding the standard-setting activity;

Lists of stakeholders contacted;

Interested parties participating in each stage of the process;

Comments received and a synopsis of responses to those comments; and

All draft and final versions of the standard.

Also from the QMS

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

- <https://rfmcertification.org/stakeholder-involvement/consultation-archives/>
- QMS, RFM Certification Program, Version 5.1,
- Clause 5.6.4 Issue and Control of Documents
- https://rfmcertification.org/wp-content/uploads/2022/11/QMS-V5.1-Nov-2022_2.pdf
- RFM Procedure 10, Version 1.1: CSC RFM Standard Development Procedure
- <https://rfmcertification.org/wp-content/uploads/2022/11/Procedure-10-V1.1-CSC-Final-Nov-2022.pdf>
- RFM Procedure 5 Version 5.1 : Program Administration,
- https://rfmcertification.org/wp-content/uploads/2022/11/Procedure-5-V5.1-Nov-2022_2.pdf
- ToR for Fishery Standard V2
- WSC consultation

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A.3.07 Record Keeping

CSC 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 noncompliances 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.

Evidence of extensive stakeholder consultation for key standard revision is available and supplied, which was not publicly available. This included attendance and consultations at the World Seafood Congress 2015 and all comments received at that time of standards development.

Procedure 10: CSC RFM Standard Development Procedure includes the development process and stakeholder input

The stakeholder webpage includes the consultations page, including previous/archived consultations. This includes copies of comments received, that are made publicly available

A.3.08 Participation and Consultation

GSSI Component	Guidance
At the outset of a standard development or revision process, the Scheme Owner makes publicly available a summary of the process that includes:	The Scheme Owner has a mechanism in place assuring that a summary of the process is made easily available for the public

A . 3 S T A N D A R D S E T T I N G A N D M A I N T E N A N C E

A.3.08 Participation and Consultation

- contact information and information on how to contribute to the consultation;
- summary of the terms of reference for the standard, including the proposed scope, objectives and justification of the need for the standard;
- steps in the standard-setting process, including timelines and clearly identified opportunities for contributing; and
- decision-making procedures, including how decisions are made and who makes them.

online at the outset of the process. This includes Who and How to contribute, timeline, summary ToR and decision making (who and how).

Examples of evidence for scheme alignment:

- internal procedure/quality handbook describing elements and process of public summary.
- examples of availability of past or current information.

Conclusion

The RFM Program is in alignment because the Standards Review phase and Standards Development phase includes publicized stakeholder engagement in the format of an Open Comment Period.

The CSC Program Manager is responsible for publicizing the commencement of a formal Open Comment Period in the national seafood media. This will state the Standard and the window for comment. Stakeholders can submit via the official form on the RFM website. A summary of the process is posted on how to make a submission,

All other relevant standard information is also available from the RFM website

A Program of Work is posted every 6 month providing interested parties with updates on standards setting and other activities.

RFM Procedure 10: CSC RFM Standard Development Procedure

Provides an overview of the development process, including the role of governance groups. Section 6.1 shows the stages in the preparation of new or updated CSC RFM standard or revision (listed below)

References

- Program of work July-Dec 2022
- https://rfmcertification.org/wp-content/uploads/2022/08/RFM-Program-of-Work_July2022_Dec2022-Final-Web.pdf
- Program of Work Updates
- https://rfmcertification.org/wp-content/uploads/2022/05/RFM-Program-of-Work_Jan2022_June2022-Web.pdf
- RFM Procedure 10, Version 1.1: CSC RFM Standard Development Procedure
- Section 6.1
- <https://rfmcertification.org/wp-content/uploads/2022/11/Procedure-10-V1.1-CSC-Final-Nov-2022.pdf>

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A.3.08 Participation and Consultation

1. Preliminary draft
2. Committee draft or drafts
3. Public comment draft
4. Final committee draft
5. Committee review
6. CSC Board approval

Section 6 states that "the committee and the CSC Program Manager ensure that the overall process, including procedures and public input opportunities, are made transparent to the public through the CSC website".

Consultation information is added to the RFM website – copies of previous consultations are retained online (link provided)

ToR for RFM V2 was established at the outset – copy provided

- RFM Procedure 5: Program Administration Version 5, September 2020
- 3.6 Program of Work
- https://rfmcertification.org/wp-content/uploads/2022/11/Procedure-5-V5.1-Nov-2022_2.pdf
- Stakeholder Involvement Process in the RFM Certification Program
- <https://rfmcertification.org/stakeholder-involvement/>
- ToR Fishery Standard V2

A.3.09 Participation and Consultation

GSSI Component	Guidance
The Scheme Owner or delegated authority ensures participation by independent technical experts and enables balanced participation by stakeholders in the	<p>The Scheme Owner, or delegated authority, has mechanism to ensure participation of necessary technical experts and balance of different stakeholder perspectives in standard development and maintenance. A balanced participation of stakeholders would include: fisheries/aquaculture management authorities, the fishing/aquaculture industry, fish workers organizations, fishing/ aquaculture communities, the scientific community, environmental interest groups, fish processors/traders/retailers, aquaculture input providers such as feed providers, hatcheries/nurseries and possibly treatment providers, as well as consumer associations.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> - internal procedure/quality handbook for standard development

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A.3.09 Participation and Consultation

<p>standard development, revision and approval process.</p>	<p>- revision and approval processes that describe how balance is achieved, such as through stakeholder mapping, announcements and invitation.</p> <p>Draft documents and meeting minutes/email correspondence indicate that during standard development, revision and approval processes of the past, independent technical experts participated, and a balanced participation by stakeholders was encouraged.</p>
Conclusion	References
<p>The RFM Program is in alignment because there is an appointed RFM Fishery Standard Committee and Chain of Custody Technical Committee. ToR are in place and ensure the membership of the Committees have sufficient representation of the broad policy/management; fishery and environmental science and fishery operational aspects of fisheries is available, as well as an appreciation of the certification of responsible fisheries management.</p> <p>The Committee representation will be adapted from time to time to ensure it continues to represent the interests of the fishery regions and areas of broader certification interest.</p> <p>Procedure 10 sets out the standard development process; Section 6 states "As part of this effort, the committee and the CSC Program Manager ensure that the overall process, including procedures and public input opportunities, are made transparent to the public through the CSC website."</p> <p>Terms of Reference are published at the outset of the process and stakeholders are invited to make comments and feedback. These are shared widely with the certified companies as well.</p> <p>Drafts of the standard are published online and stakeholders invited to make feedback. This is online through the RFM website. The webpage relating to 'consultations' shows the details for the (now closed) consultation for CoC. This states:</p>	<ul style="list-style-type: none"> • Consultations • https://rfmcertification.org/stakeholder-involvement/consultations/ • QMS, RFM Certification Program, Version 5.1 • https://rfmcertification.org/wp-content/uploads/2022/11/QMS-V5.1-Nov-2022_2.pdf • RFM Procedure 10, Version 1.1: CSC RFM Standard Development Procedure • Section 6.1 • https://rfmcertification.org/wp-content/uploads/2022/11/Procedure-10-V1.1-CSC-Final-Nov-2022.pdf • Terms of Reference for Fisheries Standard Committee (FSC) • https://rfmcertification.org/wp-content/uploads/2022/09/FSC-TOR_Sept-2022_Final.pdf

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A.3.09 Participation and Consultation

"RFM Joint Chain of Custody Standard Public Comment Period Open – October 14, 2021 – November 12, 2021 – NOW CLOSED.

Iceland Responsible Fisheries Foundation (IRFF) and the Certified Seafood Collaborative (CSC, Alaska) on behalf of their members and their respective fishing communities, are pleased to announce that the RFM Chain of Custody Standard is now available for 30-day public and stakeholder comment period.

The present Chain of Custody Standard was drafted in the beginning of 2021. The Standard has been revised and approved by the IRFF technical committee and the CSC technical committee. It is intended for application in RFM certification programs, including those currently under development.

Instructions for the Submission of Comments

The CSC and IRFF value all stakeholder input and will take into consideration all relevant comments before releasing the final version of the RFM Chain of Custody Standard. We invite any interested party, who may wish to make a constructive and specific comment on the Standard, to do so within the period of October 14, 2021 – November 12, 2021 and in accordance with the following format and instructions.

Access the draft RFM Chain of Custody Standard here (link was available)

Unattributed comments (without name, address and contact e-mail) will not be considered.

Only one submission per organization should be made and must be attributable to a principal contact person that represents that organization.

Comments cannot represent the views of more than a single organization. Comments received pertaining to the views of more than one organization will not be considered.

Comments must specifically state the Section and clause(s) of the Joint Chain of Custody Standard of interest in order to be eligible for consideration.

- Fisheries Standard Committee and Biographies
- <https://rfmcertification.org/about-rfm/governance/>
- WSC consultations summary

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A.3.09 Participation and Consultation

All comments can be emailed to rfm@rfmcertification.org "

Drafts are also discussed at workshops, for example CoC was discussed at a World Seafood Congress meeting in 2015. Detailed feedback was received from 8 stakeholders. A note from the meeting shows 57 people were contacted to discuss the RFM.

A.3.10 Participation and Consultation

GSSI Component	Guidance
The Scheme Owner allows a period of at least 60 days for the submission of comments on the draft standard.	<p>The Scheme Owner has a mechanism in place to assure a minimum of 60 days for comments on major changes of the draft standard. A Standard is considered to be a set of documents that provide rules and guidelines to achieve results and that include all normative documents used for the certification process. The Scheme owner shall define which documents are part of the standard. This may include standard governance and setting procedures, requirements for certification bodies and certified entities</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> - internal procedure/quality handbook defining public comment period, what are considered major changes and what constitutes the standard - ToR <p>Review previous comments and dates for submission on draft standards.</p>
Conclusion	References
<p>The RFM Program is in alignment because Open Public Comment Periods are set at a duration of 60 days. This is set in the standard development procedure p3, 6.1</p> <p>There was a formal 60-day Open Public Comment Period for the RFM Standards and Scoring Guidance V2.0/2.1. Comments were submitted by interested parties, which are subject to review</p>	<ul style="list-style-type: none"> • Procedure 10 Standard development procedure

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A.3.10 Participation and Consultation

and consideration by the Technical Committee. Recent Public Consultation for the CoC Standard of 30 days since this was a structural change (minor changes to criteria) allowing more mutual use of the same CoC Standard between RFM Programs in North America and in Iceland. Previous to this On June 6, 2016 the Alaska Seafood Marketing Institute (ASMI) opened a 60-Day. This is archived on the RFM website,

- https://rfmcertification.org/wp-content/uploads/2022/08/Procedure-10-CSC_Final.pdf
- Version 2.0 Consultation
- <https://rfmcertification.org/stakeholder-involvement/consultation-archives/>

A.3.11 Participation and Consultation

GSSI Component	Guidance
No later than the start of the comment period, the Scheme Owner publishes a notice announcing the period for commenting in a national or, as may be, regional or international publication of standardization activities and/or on the internet.	<p>Timely announcements are made regarding the public comment period in appropriate channels so that they are easily available to relevant stakeholders. This can be online and/or in an appropriate publication. Dates should be clearly stated.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> - internal procedure defining process. - previous announcements are dated and were published before the beginning of the comment period. - newsletters - record of publication on SO's website
Conclusion	References
<p>The RFM Program is in alignment because Open Comment Periods are announced on the RFM Website and in the national seafood media. This will state the Standard and the window for comment.</p> <p>Examples are archived on the RFM website at https://rfmcertification.org/stakeholder-involvement/consultations/ including recent RFM Joint Chain of Custody Standard Public Comment Period Open – October 14, 2021 – November 12, 2021 – NOW CLOSED.</p>	<ul style="list-style-type: none"> • Consultations page • https://rfmcertification.org/stakeholder-involvement/consultations/ • RFM Procedure 10, Version 1.1: CSC RFM Standard Development Procedure,

A.3 STANDARD SETTING AND MAINTENANCE

A.3.11 Participation and Consultation

Stakeholders can submit via the official form on the RFM website, either electronically, via the web based portal or by mailing the official form directly to the RFM team.

RFM Procedure 10: CSC RFM Standard Development Procedure

Provides an overview of the development process, including the role of governance groups.

Section 6.1 shows the stages in the preparation of new or updated CSC RFM standard or revision (listed below)

1. Preliminary draft
2. Committee draft or drafts
3. Public comment draft
4. Final committee draft
5. Committee review
6. CSC Board approval

Section 6 states "As part of this effort, the committee and the CSC Program Manager ensure that the overall process, including procedures and public input opportunities, are made transparent to the public through the CSC website."

- <https://rfmcertification.org/wp-content/uploads/2022/11/Procedure-10-V1.1-CSC-Final-Nov-2022.pdf>
- ToR Fishery Standard V2

A.3.12 Participation and Consultation

GSSI Component	Guidance
The Scheme Owner identifies all impacted stakeholders and ensures proactively that all can participate in the standard-setting process through a consultation forum or are made aware of alternative	<p>The Scheme Owner has a mechanism is in place to identify all impacted stakeholders. It makes sure that, when needed, alternative tools are in place to leverage potential barriers to participate.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> - Stakeholder mapping including past participation - internal procedure/quality handbook defining public consultation process. - ToR. Review participation, communication and mechanisms/tools of past or current consultation.

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A.3.12 Participation and Consultation

mechanisms by which they can participate. This includes stakeholders that are not well represented in consultations and disadvantaged stakeholders (small-scale operations and vulnerable groups).	- meeting minutes, announcements, publications and or email communication indicate that the Scheme Owner is proactively seeking the input of specific stakeholder groups.
Conclusion	References
<p>The RFM Program is in alignment because Standards Review Meetings are open to the public and transparent. Therefore, the Committee is open and accessible to all interested parties, and stakeholders can make suggestions directly to the Committee, as well as participating in or providing direct input to the committee agenda during these public meetings.</p> <p>Minutes of meetings are publicly available.</p> <p>Participation in the Committee meetings is open to all stakeholders.</p> <p>The RFM Program is in alignment because the Scheme has a Revision Plan to engage with stakeholders at a number of conferences and expos, including attendance at Boston, Brussels (Barcelona) and the World Seafood Congress. These will be attended by a wide spectrum of stakeholders.</p> <p>Contributions from stakeholders at the World Seafood Congress were recorded and considered in the development of RFM Version 2.1.</p> <p>RFM Newsletters are posted to provide updates to the standards setting schedule and key contacts, and an e-mail sign up for updates.</p> <p>Procedure 10 sets out the standard development process; Section 6 states "As part of this effort, the committee and the CSC Program Manager ensure that the overall process, including</p>	<ul style="list-style-type: none"> Alaska RFM Video/ Eblasts https://rfmcertification.org/rfm-news/ RFM Newsletter example https://cdn.rfmcertification.org/wp-content/uploads/2021/06/RFM-Newsletter-March-2020_digital-004.pdf RFM Procedure 10, Version 1.1: CSC RFM Standard Development Procedure Standard development procedure Section 6 https://rfmcertification.org/wp-content/uploads/2022/11/Procedure-10-V1.1-CSC-Final-Nov-2022.pdf RFM Procedure 5 Version 5.1: Program Administration, 4. Record Management https://rfmcertification.org/wp-content/uploads/2022/11/Procedure-5-V5.1-Nov-2022_2.pdf

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procedures and public input opportunities, are made transparent to the public through the CSC website."

Terms of Reference are published at the outset of the process and stakeholders are invited to make comments and feedback. These are shared widely with the certified companies as well.

Drafts of the standard are published online and stakeholders invited to make feedback. This is online through the RFM website. The webpage relating to 'consultations' shows the details for the (now closed) consultation for CoC. This states:

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The present Chain of Custody Standard was drafted in the beginning of 2021. The Standard has been revised and approved by the IRFF technical committee and the CSC technical committee. It is intended for application in RFM certification programs, including those currently under development.

Instructions for the Submission of Comments

The CSC and IRFF value all stakeholder input and will take into consideration all relevant comments before releasing the final version of the RFM Chain of Custody Standard. We invite any interested party, who may wish to make a constructive and specific comment on the Standard, to do so within the period of October 14, 2021 – November 12, 2021 and in accordance with the following format and instructions.

- Stakeholder webpage - consultations
- <https://rfmcertification.org/stakeholder-involvement/consultations/>
- ToR Fishery Standard V2

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A.3.12 Participation and Consultation

Access the draft RFM Chain of Custody Standard here ([LINK](#))

Unattributed comments (without name, address and contact e-mail) will not be considered.

Only one submission per organization should be made and must be attributable to a principal contact person that represents that organization.

Comments cannot represent the views of more than a single organization. Comments received pertaining to the views of more than one organization will not be considered.

Comments must specifically state the Section and clause(s) of the Joint Chain of Custody Standard of interest in order to be eligible for consideration.

All comments can be emailed to rfm@rfmcertification.org "

Drafts are also discussed at workshops, for example CoC was discussed at a World Seafood Congress meeting in 2015. Detailed feedback was received from 8 stakeholders. A note from the meeting shows 57 people were contacted to discuss the RFM as part of broader consultation.

A.3.13 Participation and Consultation

GSSI Component	Guidance
The Scheme Owner makes publicly available all comments received in the consultation respecting personal data protection.	<p>All comments received during the public comment period are made publicly available without attribution or identifier.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> - internal procedure/quality handbook describing policy, current or past public comment comments posted online.
Conclusion	References
The RFM Program is in alignment because all comments will be made publicly available on the RFM website.	<ul style="list-style-type: none"> • Consultation Archives • https://rfmcertification.org/stakeholder-involvement/consultation-archives/

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A.3.14 Participation and Consultation

GSSI Component	Guidance
The Scheme Owner takes into account in further processing of the standard, comments received during the period for commenting.	<p>The Scheme Owner has a process for considering all comments received during the public consultation on the standard. Comments which are integrated into the standard should be clearly identified.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> - some sort of system (e.g. excel) for organizing, categorizing and responding to comments. - review past consultation system, comments and response taken.
Conclusion	References
<p>The RFM Program is in alignment because responses to all submitted comments will be made publicly available alongside the comments on the RFM website.</p> <p>Each public comment submitted is assessed and reviewed by the RFM Fisheries Standard Committee (FSC). Each public comment along with the FSC responses and recommended actions/decisions are incorporated into an Excel spreadsheet which identifies and tracks how each comment is handled. This is publicly available on the RFM website.</p> <p>The RFM Team keeps on file for a period of at least one full Standards Revision the following records related to each Standard Development or Revision Process:</p> <ul style="list-style-type: none"> - Policies and procedures guiding the standard-setting activity. - Lists of stakeholders contacted. - Interested parties involved at each stage of the process. - Comments received and a synopsis of how those comments were taken into account; and - All draft and final versions of the Standard. 	<ul style="list-style-type: none"> • Consultation Archives • https://rfmcertification.org/stakeholder-involvement/consultation-archives/ • QMS, RFM Certification Program, Version 5.1 • Section 3.2 • https://rfmcertification.org/wp-content/uploads/2022/11/QMS-V5.1-Nov-2022_2.pdf • RFM Procedure 10, Version 1.1: CSC RFM Standard Development Procedure, • Section 6.1 • https://rfmcertification.org/wp-content/uploads/2022/11/Procedure-10-V1.1-CSC-Final-Nov-2022.pdf • WSC consultation summary

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A.3.14 Participation and Consultation

Drafts of the standard are published online and stakeholders invited to make feedback. This is online through the RFM website. The webpage relating to 'consultations' shows the details for the (now closed) consultation for CoC. This states:

"RFM Joint Chain of Custody Standard Public Comment Period Open – October 14, 2021 – November 12, 2021 – NOW CLOSED.

Iceland Responsible Fisheries Foundation (IRFF) and the Certified Seafood Collaborative (CSC, Alaska) on behalf of their members and their respective fishing communities, are pleased to announce that the RFM Chain of Custody Standard is now available for 30-day public and stakeholder comment period.

The present Chain of Custody Standard was drafted in the beginning of 2021. The Standard has been revised and approved by the IRFF technical committee and the CSC technical committee. It is intended for application in RFM certification programs, including those currently under development.

Instructions for the Submission of Comments

The CSC and IRFF value all stakeholder input and will take into consideration all relevant comments before releasing the final version of the RFM Chain of Custody Standard. We invite any interested party, who may wish to make a constructive and specific comment on the Standard, to do so within the period of October 14, 2021 – November 12, 2021 and in accordance with the following format and instructions.

Access the draft RFM Chain of Custody Standard here ([LINK](#))

Unattributed comments (without name, address and contact e-mail) will not be considered.

Only one submission per organization should be made and must be attributable to a principal contact person that represents that organization.

A . 3 S T A N D A R D S E T T I N G A N D M A I N T E N A N C E

A.3.14 Participation and Consultation

Comments cannot represent the views of more than a single organization. Comments received pertaining to the views of more than one organization will not be considered.

Comments must specifically state the Section and clause(s) of the Joint Chain of Custody Standard of interest in order to be eligible for consideration.

All comments can be emailed to rfm@rfmcertification.org "

Drafts are also discussed at workshops, for example CoC was discussed at a World Seafood Congress meeting in 2015 where a broad number of stakeholders were invited to attend.

Detailed feedback was received from 8 stakeholders. A note from the meeting shows 57 people were contacted to discuss the RFM as part of broader consultation.

A.3.15 Standards Content

GSSI Component	Guidance
<p>The Scheme Owner ensures that the standard is consistent with the following requirements:</p> <ul style="list-style-type: none"> – only includes language that is clear, specific, objective and verifiable. – is expressed in terms of process, management and / or performance criteria, rather than design or descriptive characteristics; (ISO 59) – does not favor a particular technology, patented item or service provider; and (ISO 59) – attributes or cites all original intellectual sources of content. 	<p>The Scheme Owner has a mechanism in place to review standards in respect to the listed requirements.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> – internal procedure/quality handbook defining all list requirements. Some standards state these in their preamble as principles or references. – review that this list was checked for the current standards – review standards and if available mandatory checklists/audit manuals in respect to the listed requirements. – review any available complaints relating to this requirement.

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A.3.15 Standards Content

Conclusion	References
<p>The RFM Program is in alignment because of the evidence found in the contents of the Standards and associated documents.</p> <p>From the QMS Manual, Appendix</p> <p>The RFM Certification Program is committed to the following objectives:</p> <p>The principal objectives of the CSC RFM Program are:</p> <ul style="list-style-type: none"> 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 CSC 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 CSC RFM Certification Program; d) To provide both large and small businesses with cost effective means to supply the marketplace with ‘CSC RFM Chain of Custody’ certified products; and e) To provide a range of North American fishery products certified to the CSC RFM Standards to buyers and consumers. <p>Also from the Appendix,</p> <p>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:</p> <ul style="list-style-type: none"> 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; 	<ul style="list-style-type: none"> • Chain of Custody V2.5 • QMS, RFM Certification Program, Version 5.1 <ul style="list-style-type: none"> • 2.2 Key Performance Indicators for RFM and Appendix • https://rfmcertification.org/wp-content/uploads/2022/11/QMS-V5.1-Nov-2022_2.pdf • RFM Procedure 10, Version 1.1: CSC RFM Standard Development Procedure <ul style="list-style-type: none"> • Section 6.1 • https://rfmcertification.org/wp-content/uploads/2022/11/Procedure-10-V1.1-CSC-Final-Nov-2022.pdf

A . 3 S T A N D A R D S E T T I N G A N D M A I N T E N A N C E

A.3.15 Standards Content

- 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 v6.0, 2014;
- e) ISEAL Code of Good Practice for Assuring Conformance with Social and Environmental Standards, v2.0 2018;
- f) ISEAL Code of Good Practice for Assessing the Impacts of Social and Environmental Standards, v2.0 2014;
- g) FAO Guidelines on Bycatch Management and Reduction of Discards (2011);
- 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;
- n) The GSSI Benchmark Tool for Seafood Certification Programs (Version 2 2021);
- 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

Extensive feasibility testing, consultation with fishery applicants, stakeholders, supply chain users has been performed during the initial Program and Standards development.

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A.3.15 Standards Content

Procedure 10, Section 6.1 states

2-Committee draft. The committee examine and approve the preliminary draft. To gain approval the decision must reflect consensus among the committee members. The committee can suggest changes through the CSC Program Manager to review with the expert consultants and with the program's Certification Bodies to check their auditability. If there are many contentious points or points requiring further investigation or testing, there may be several committee drafts. Completed/Approved committee draft pass to the CSC Program Manager in preparation for public comment.

A.3.16 Standards Content

GSSI Component	Guidance
As part of the standard development process, the Scheme Owner assesses the feasibility and auditability of requirements in the draft standard.	<p>The Scheme Owner has a mechanism in place to test the feasibility (cost, time) and auditability (interpretation, consistency) of requirements prior to finalization of the standards.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> - internal procedure, quality handbook, standard setting work plan. - review assessment outcomes of past processes including revisions based on findings.
Conclusion	References
The RFM Program is in alignment because of testing of the standards has been carried out by accredited Certification Bodies on the contents of the Standards, and associated documents as well as the Accreditation reviews. Extensive feasibility tests, and consultation was conducted during the initial RFM Program development. Review procedures are in place to ensure it continues to develop in accordance with user and market needs and responds to stakeholder inputs and comments.	<ul style="list-style-type: none"> • Audit reports (by species) • https://rfmcertification.org/certified-fishery-species/ • RFM Procedure 10, Version 1.1: CSC RFM Standard Development Procedure • Section 6.1 part 2

A . 3 S T A N D A R D S E T T I N G A N D M A I N T E N A N C E

A.3.16 Standards Content

The new unified RFM Chain of Custody Standard Version 2.5 with mutual use by RFM Programs is an example of this.

Audit reports are available following testing of both the RFM and CoC Standards. Records of comments and actions are also available.

Procedure 10, Section 6.1 states 2-Committee draft. The committee examine and approve the preliminary draft. To gain approval the decision must reflect consensus among the committee members. The committee can suggest changes through the CSC Program Manager to review with the expert consultants and with the program's Certification Bodies to check their auditability. If there are many contentious points or points requiring further investigation or testing, there may be several committee drafts. Completed/Approved committee draft pass to the CSC Program Manager in preparation for public comment.

- <https://rfmcertification.org/wp-content/uploads/2022/11/Procedure-10-V1.1-CSC-Final-Nov-2022.pdf>
- RFM Procedure 5: Program Administration Version 5, September 2020
- <https://cdn.rfmcertification.org/wp-content/uploads/2021/06/Procedure-5-CSC-Updated-Version-5.0-Final-Posting-Program-Administration.pdf>
- Unified Responsible Fisheries Management (RFM) Chain of Custody Standard
- See stages 3 to 7
- https://cdn.rfmcertification.org/wp-content/uploads/2022/02/Unified-RFM-CoC-V2.5_Final_Website-Posting.pdf

A.3.17 Standards Content

GSSI Component	Guidance
The Scheme Owner demonstrates that all criteria in the standard contribute to the standard's defined objectives.	<p>Criteria are related to how the Scheme Owner's objectives are met by identifying the acceptable performance. Often they are logically grouped around principles and objectives.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> - comparison of the Scheme Owner performance indicators with the standard's criteria. - monitoring and evaluation system of the performance indicators. - criteria that are not monitored and not evaluated may be surplus to the objective of the standards.

A . 3 S T A N D A R D S E T T I N G A N D M A I N T E N A N C E

A.3.17 Standards Content

Conclusion	References
<p>The RFM Program is in alignment because all RFM Conformance Criteria are developed from the FAO reference documents and as such form the basis for achieving the defined objectives. This is evidenced throughout the standard.</p> <p>The RFM Certification Program is committed to the following objectives: (QMS, Section 2.2)</p> <ul style="list-style-type: none"> 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. g) To provide a system for assessing the supply chain traceability and product integrity that voluntarily submit to a Chain of Custody Audit in advance of any claim being made on the origin of seafood product that is traceable back to an RFM certificated fishery <p>Success has been determined by ISO 17065 Accredited Certification, Client and Market Satisfaction and the absence of Complaints.</p> <p>It is the objective of RFM to maintain GSSI approval which also ensures the Program s Standards remain in line with FAO Criteria.</p> <p>Annual performance reviews are conducted to support the evaluation of performance and alignment with the Program Objectives.</p>	<ul style="list-style-type: none"> • 2021 Responsible Fisheries Management (RFM) Program Internal Annual Program Review Report December 2021 • https://cdn.rfmcertification.org/wp-content/uploads/2021/12/2021-Internal-Review-Alaska-RFM-Program-FINAL-Dec-2021-121421.pdf • QMS, RFM Certification Program, Version 5, • Section 2.2, key objectives of RFM • https://rfmcertification.org/wp-content/uploads/2022/08/QMS-Chapters-1-7_Final.pdf

A . 3 S T A N D A R D S E T T I N G A N D M A I N T E N A N C E

A.3.18 Standards Content		
GSSI Component	Guidance	
The Scheme Owner ensures that the standard is locally applicable. Where the Scheme Owner adapts the standard for direct application at the national or regional level, the Scheme Owner develops interpretive guidance or related policies and procedures for how to take into account local environmental and regulatory conditions.	<p>The Scheme Owner has mechanisms in place to ensure local applicability and relevance. For national or regional standards, the Scheme Owner has a process to take into account local environmental and regulatory conditions through guidance and policies.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> - policies, internal procedures and quality handbook documenting process to consider environmental and regulatory aspects. - compare geographical scope of standard and implementation (certificates) with available documented interpretation guidance. - assessment or monitoring reporting indicating where locally specific guidance is required. 	
Conclusion	References	
<p>The RFM Program is in alignment. RFM has moved from an Alaska specific scheme to a North American Scheme, including Canadian EEZ.</p> <p>RFM Fisheries Standard Version 2.1 is a change in scope only.</p> <p>Version 2.1 is a reissue of Version 2.0 reflecting that the scope is changing from Alaska only fisheries to North American fisheries operating within the U.S and Canadian 200nm EEZ.</p> <p>The Pacific Whiting (Hake) Mid-Water Trawl fishery, covering US federal EEZ waters off Washington, Oregon, and California has been certified to the RFM Fishery Standard on behalf of the Pacific Whiting Conservation Cooperative (PWCC) in collaboration with all sectors of the US whiting fishery. MRAG Americas, Inc. conducted the independent assessment for PWCC in partnership with the entire US whiting fishery. Site visits, assessment team, and timelines are available at the RFM website.</p>	<ul style="list-style-type: none"> • Guidance to Performance Evaluation for the Certification of Wild Capture and Enhanced Fisheries in North America V2.1 • https://rfmcertification.org/wp-content/uploads/2021/06/AK-RFM-V2.1-GuidanceDraft-Jan-2021_Final.pdf • Hake fishery assessment webpage • https://rfmcertification.org/certified-fishery-species/pacific-whiting-hake/ • RFM Certification Fisheries Standard V 2.1 Sept 2020 	

A . 3 S T A N D A R D S E T T I N G A N D M A I N T E N A N C E

A.3.18 Standards Content

When the scope of the standard changed, all the associated guidance also changed to reflect any changes in requirements

- https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC-RFM-V2.1-StandardFINAL-Sept-2020_Final-1.pdf

A.3.19 Standards Accessibility

GSSI Component	Guidance
The Scheme Owner promptly publishes adopted standards, and makes them available for free on its website, and on request, to anyone expressing interest.	Standards are published in a timely fashion and are freely available online and on request. Validity dates coincide with publication dates of standards (taking transition periods into account) and the public work program on standard setting and maintenance.
Conclusion	References
The RFM Program is in alignment because its Standards are publicly and freely available on the RFM website.	<ul style="list-style-type: none"> • Fisheries Standard Version 2.1 For the assessment of North America fisheries • https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC-RFM-V2.1-StandardFINAL-Sept-2020_Final-1.pdf • Unified RFM Chain of Custody V2.5 • https://cdn.rfmcertification.org/wp-content/uploads/2022/02/Unified-RFM-CoC-V2.5_Final_Website-Posting.pdf

A . 3 S T A N D A R D S E T T I N G A N D M A I N T E N A N C E

A.3.20 Standards Accessibility

GSSI Component	Guidance
The Scheme Owner shall makes translations of the standard into English and in the most relevant/appropriate languages, to ensure access and transparency, freely available and authorizes translations into other languages where necessary for credible implementation of the standard.	<p>The Scheme Owner has a mechanism in place to identify the applicability and need for translations based on geographical scope of certification, as well as the geographical range of certified entities and products. The process includes an assessment in order to ensure accurate translation.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> - internal procedure, quality handbook, current language availability, work plan of translations, process for ensuring accuracy of translations.
Conclusion	References
<p>RFM Fishery Standard has North American scope, which is predominantly American-English.</p> <p>Translations are available for information sheets and programme guidance sheets. There has never been a request for the translation of the CoC Standard, but it could easily be translated if required.</p>	<ul style="list-style-type: none"> • QMS, RFM Certification Program, Version 5, • https://rfmcertification.org/wp-content/uploads/2022/08/QMS-Chapters-1-7_Final.pdf

A . 3 S T A N D A R D S E T T I N G A N D M A I N T E N A N C E

A.3.21 Transition Period

GSSI Component	Guidance	
The Scheme Owner ensures that certified entities are informed of the revised standard and transition period, either directly or through their certification bodies.	<p>The Scheme Owner has a mechanism in place assuring that certified entities are informed of standard revision and transition periods. This can be done directly or through other assurance bodies.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> - internal procedures, quality handbook, contracts/agreements or formal arrangements with certification bodies. - review process of previous revisions if applicable. 	
Conclusion	References	
<p>The RFM Program is in alignment because the RFM Team will issue the new Standard and inform all relevant parties of the change of revision and adoption once the redrafted Standard is approved by the RFM Board.</p> <p>The RFM Management will record in the Standard the date of a revision or reaffirmation of the Standard along with a transition period after which the revised Standard will come into effect.</p> <p>The new/revised standard will be posted on the RFM website and CB's and Applicants will be informed as part of the continuous engagement process.</p>	<ul style="list-style-type: none"> • QMS, RFM Certification Program, Version 5, September 2020 • Clause 5.6.4 Issue and Control of Documents • https://rfmcertification.org/wp-content/uploads/2022/08/QMS-Chapters-1-7_Final.pdf • Terms of Reference for Fisheries Standard Committee (FSC) • https://cdn.rfmcertification.org/wp-content/uploads/2021/06/FSC-TOR_June2016.pdf 	

A . 3 S T A N D A R D S E T T I N G A N D M A I N T E N A N C E

A.3.22 Transition Period

GSSI Component	Guidance	
The Scheme Owner requires that the certified entities are given a period of at least three years to come into compliance with revised fishery standards and at least one year for revised aquaculture standards	<p>Certified entities are given sufficient time to come into compliance with revised standards, for fisheries – minimum three years and at least one year for revised aquaculture standards.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> - standards, certification requirements/methodologies which state minimum transition period for revised standards 	
Conclusion		References
<p>The RFM Program is in alignment because Current Fishery clients of the Program will be allowed up to 36 months to implement changes to meet new clauses in the Standard.</p> <p>Chain of Custody Applicants will be allowed 12 months to meet new clauses.</p> <p>Standard V2.1 page 4 "Current fisheries certified under V1.3 are allowed a minimum of three years from the V2.0 effective date of 8/1/2019."</p>		<ul style="list-style-type: none"> • TERMS OF REFERENCE FOR FISHERIES STANDARD COMMITTEE (FSC) • https://cdn.rfmcertification.org/wp-content/uploads/2021/06/FSC-TOR_June2016.pdf

A.3.23 Transition Period

GSSI Component	Guidance
The Scheme Owner notes in the standard the date of a revision or reaffirmation of the standard along with a transition period after which the revised standard will come into effect.	Standards include date of version and any transition period for the certified entity to come into compliance. If there are normative documents other than the standard and certification requirements/methodologies which affect compliance of fisheries/aquaculture, these similarly should contain the described validity dates.

A . 3 S T A N D A R D S E T T I N G A N D M A I N T E N A N C E

A.3.23 Transition Period

Conclusion	References
<p>The RFM Program is in alignment because the RFM manager will record in the Standard the date of a revision or reaffirmation of the Standard along with a transition period, after which, the revised Standard will come into effect.</p> <p>The new/revised Standard is posted on the RFM website after completion. The latest version is 2.1</p> <p>The website was updated to clarify the development of standards. It states the following to reflect the changes in the fishery standard V2 to V2.1</p> <p>RFM Fisheries Standard Version 2.1 is A Reissue of Version 2.0 Reflecting That the Scope is Changing From Alaska Only Fisheries to North American Fisheries Operating Within the U.S. and Canadian 200 NM EEZ</p> <p>The RFM Standard has been in existence since 2010 and is now on Fishery Standard Version 2.1. Version 2.0 went through substantial changes and Version 2.1 is simply a reissue of Version 2.0, reflecting that the scope changed from Alaska only fisheries to North American fisheries operating within the U.S. NM EEZ</p> <p>The details on the webpage have been revised to explain that it was V2 that had substantive changes:</p> <p>The RFM Fisheries Standard V 2.0 included many substantial changes, adding depth and robustness to the RFM Certification Program. Revisions are based on needs for improvements and required components of Global Sustainable Seafood Initiative (GSSI) global benchmark tool.</p> <p>The transition period is also explained;</p> <p>Certified Fisheries can choose to use the new V2.1 Standard immediately but will be given a period of at least three years to come into compliance with revised fishery standard V2.1. Surveillance audits for existing certified fisheries will continue to be against RFM V1.3 (the outgoing standard)</p>	<ul style="list-style-type: none"> • CoC standard webpage • https://rfmcertification.org/chain-of-custody/standard/ • Fisheries standard webpage • https://rfmcertification.org/fisheries-standard/ • RFM Fisheries Standard Version 2.1 • https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC-RFM-V2.1-StandardFINAL-Sept-2020_Final-1.pdf • RFM Procedure 5: Program Administration: Annual Review, Document Control/ Management, and Program of Work • https://rfmcertification.org/wp-content/uploads/2022/08/Procedure-5-CSC_Final.pdf

A . 3 S T A N D A R D S E T T I N G A N D M A I N T E N A N C E

A.3.23 Transition Period

until May 2021 unless the Fishery specifically requests an assessment against the new RFM V2.1 Standard.

**SECTION B.
OPERATIONAL
MANAGEMENT OF
SEAFOOD
CERTIFICATION
SCHEMES**



B.1 ACCREDITATION

B.1.01 ISO-17011 Compliance

GSSI Component	Guidance	
The Scheme Owner has a contractual, enforceable arrangement or formal understanding that requires accreditation bodies to be compliant with the requirements of ISO/IEC 17011 in its applicable version.	<p>The Scheme Owner has a contract, memorandum of understanding or enforceable arrangement with a certification body or accreditation body that require the accreditation bodies to be compliant to ISO/ IEC 17011.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> - contracts, - memorandums of understanding and/or memorandum of agreements between scheme and accreditation bodies or certification bodies that specify accreditation bodies to be compliant with ISO/IEC 17011. - accreditation bodies' certificate of accreditation (on website). - rules for accreditation bodies in standard. 	
Conclusion	References	
<p>The RFM Program is in alignment because the Memorandum of Understanding (MoU) between CSC and ANAB, and CSC and INAB sets them as ABs for the RFM, includes the following clause:</p> <p>4.1 CSC expects that its certification bodies be accredited by an accreditation body that operates in accordance with ISO/IEC 17011 and offers accreditation services to ISO/IEC 17065/2012 and the RFM certification program requirements</p> <p>Outside North America, accreditation is carried out by INAB an accreditation body that is a member of the IAF and has an MLA. INAB is the AB that accredits NSF in Ireland.</p>	<ul style="list-style-type: none"> • Contract between CSC and ANAB • See clause 4.1 • IAF recognition of INAB • https://iaf.nu/en/member-details/?member_id=52 • INAB MLA Certificate Scope • https://www.inab.ie/about-us/international-context-for-accreditation/iaf-mla.pdf • QMS • Section 6 - Accreditation 	

B . 1 A C C R E D I T A T I O N

B.1.01 ISO-17011 Compliance

The two ABs (ANAB and INAB) are members of the IAF and as such are peer reviewed (next due 2022) and confirm compliance with ISO/IEC 17011 and are admitted to the IAF MLA.

- https://rfmcertification.org/wp-content/uploads/2022/08/QMS-Chapters-1-7_Final.pdf

B.1.02 Non-discrimination

GSSI Component	Guidance	References
The Scheme Owner ensures that accreditation services are available to certifying bodies irrespective of their country of residence, size, and of the existing number of already accredited bodies, within the scope of the scheme.	<p>The Scheme Owner ensures that access to accreditation is open to qualified certification bodies without consideration of size, country or number of existing accredited certification bodies. This could be through contracts/agreements, in referenced policies or certification requirements/methodologies.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> - application process/forms, - review list of accredited certification bodies 	
<p>Conclusion</p> <p>The RFM Program is in alignment because any CB wishing to carry out assessments against the RFM Fishery and CoC Standard must be accredited or in the process of application to ISO 17065 by a recognized Accreditation Body that is a member of IAF (International Accreditation Forum) and a signatory to the IAF Multilateral Recognition Arrangement (MLA).</p> <p>Accreditation Bodies have publicly available statements of Impartiality stating they offer Accreditation Services to any entity that meet the applicable criteria.</p> <p>Furthermore, there is an application process and MoU agreement for any interested CB.</p> <p>ANAB operate to a Code of Practice that states under Article 2. To maintain a process that is open, honest, and fair to all participants. The ANAB Bye-Laws also refer to same:</p>		<ul style="list-style-type: none"> • ANAB Bye Laws 2020 • Section 5.01 Conflict of Interest Policy, Section 5.02 Code of Conduct. • https://share.ansi.org/Shared%20Documents/About%20ANSI/Current_Versions_Proc_Docs_f or_Website/ANSI-By-Laws-current.pdf • ANAB Code of Conduct • https://www.ansi.org/resource-center/code-conduct • INAB Impartiality Statement

B . 1 A C C R E D I T A T I O N

B.1.02 Non-discrimination

Section 5.01 Conflict of Interest Policy. All members and leadership officers of the Committees of ANAB and key staff shall abide by, and act in accordance, with ANAB's Conflict of Interest Policy, as amended from time to time.

Section 5.02 Code of Conduct. All members and leadership officers of the Committees of ANAB and key staff shall abide by, and act in accordance with, ANAB's Code of Conduct, as amended from time to time.

- <https://www.inab.ie/inab-documents/mandatory-policy/inab-policy-on-impartiality.pdf>
- QMS, RFM Certification Program, Version 5, September 2020
- Section 6 - Accreditation
- https://rfmcertification.org/wp-content/uploads/2022/08/QMS-Chapters-1-7_Final.pdf

B.1.03 Specified Requirements

GSSI Component	Guidance	
The Scheme Owner specifies the requirements for certification bodies that the accreditation body is required to verify, including the respect of the scope of the scheme	<p>The Scheme Owner defines requirements for certification bodies to ensure accurate and consistent implementation. These are verified as part of the accreditation process by the accreditation body.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> - requirements are specified in certification requirements/ methodologies or a separate certification body and/or accreditation manual. - reference to requirements in contracts or formal agreements with certification bodies or accreditation bodies. 	
Conclusion		References
<p>The RFM Program is in alignment because CB requirements are set out in RFM QMS Procedure (Sections 4 and 6), and further stated in the contractual agreements between CSC and the CB.</p> <p>Overall, these are in line with the accreditation requirements of ISO 17065 which the Accreditation Body must verify as part of their MLA and service agreement with CB applicants.</p>		<ul style="list-style-type: none"> • CB Contractual agreement • Quality Management System (QMS) • Section 4 Certification and Section 6 Accreditation management

B . 1 A C C R E D I T A T I O N

B.1.03 Specified Requirements

These requirements include a documented management system, quality manual, detailed management review process, documented recruitment procedure, policies and procedures in response to appeals and complaints, and many others. The program offers training to AB to give them a full background on the RFM-ANAB webinar evidence.

Also, most AB's will bring in specialist Independent Experts to help them to assess a CB Compliance to a Standard prior to accreditation and during any subsequent annual assessment audits. There is evidence through review that CB's are meeting expectation. AB has its own review.

- https://rfmcertification.org/wp-content/uploads/2022/08/QMS-Chapters-1-7_Final.pdf

B.1.04 Transition Period

GSSI Component	Guidance	
Subsequent to any changes in the requirements for assessing certification bodies, the Scheme Owner ensures certification bodies are given a defined time period within which to conform to the changes. Special considerations should be given to certification bodies in developing countries and countries in transition.	The Scheme Owner specifies transition periods for any changes to certification requirements (B.1.03) for certification bodies to come into compliance with changes. For certification bodies in developing countries consideration is given that may include a longer transition period, capacity building or other measures. Examples of evidence for scheme alignment: – see B.1.03 reference to transition period and/or special consideration for developing country certification bodies.	
Conclusion		References
The RFM Program is in alignment because Clause 6.1.5 of the RFM QMS states; 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.		<ul style="list-style-type: none"> • Quality Management System (QMS) • Clause 6.1.5

B . 1 A C C R E D I T A T I O N

B.1.04 Transition Period

Official notification by CSC is given with a time when the new version is to come into force to all CBs, ABs and Clients.

- https://rfmcertification.org/wp-content/uploads/2022/08/QMS-Chapters-1-7_Final.pdf

B.1.05 Competencies

GSSI Component	Guidance	
The Scheme Owner only works with accreditation bodies that have personnel with the necessary education, training, technical knowledge and experience for performing accreditation functions in fisheries and aquaculture operations.	<p>The Scheme Owner ensures personnel competency through contracts or enforceable arrangements with accreditation bodies. Personnel competency includes education, training on the standard, technical knowledge and experience and can be defined by the Scheme Owner.</p> <p>Examples of objective evidence:</p> <ul style="list-style-type: none"> - Agreement/contract between the Scheme Owner and certification body to use national accreditation bodies which are IAF members and signatories to the Multilateral Recognition Arrangement for ISO 17065. - Contract/agreement between the Scheme Owner and the accreditation body if applicable, certification/accreditation manuals. - Requirements for Accreditation Bodies and personnel mentioned in the standard 	
Conclusion		References
<p>The RFM Program is in alignment because the Memorandum of Understanding between CSC and ANAB, which sets ANAB as the AB which will assess the competence of certification bodies seeking to participate in the RFM program, includes the following clause:</p> <p>"ANAB will employ a sufficient number of assessors competent to perform assessments of CBs with CSCs RFM Program requirements." The two ABs (ANAB and INAB) are both members of the IAF.</p> <p>Section 6.1.6 point 1) of the QMS stipulates requirements for personnel</p>		<ul style="list-style-type: none"> • MoU • QMS, RFM Certification Program, Version 5.1 • Section 6.1.6

B . 1 A C C R E D I T A T I O N

B.1.05 Competencies

Covered by ISO accreditation requirements. Agreement/contract between CSC and certification body to use national accreditation bodies which are IAF members and signatories to the Multilateral Recognition Arrangement for ISO 17065.

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.

- https://rfmcertification.org/wp-content/uploads/2022/11/QMS-V5.1-Nov-2022_2.pdf

B.1.06 External Review

GSSI Component	Guidance
The Scheme Owner ensures that external audits are carried out on the accreditation body to assess performance.	<p>The Scheme Owner ensures accreditation bodies undergo external/ independent performance assessments.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> - assessment process and requirements of IAF, ISEAL or other membership organization. - Scheme Owner accreditation manual or requirements, contracts or agreements, assessment reports.
Conclusion	References
<p>The RFM Program is in alignment because external/independent performance assessment is a standard component of IAF membership. IAF members undergo peer review by other IAF members to ensure quality and consistency of approach across their whole membership.</p> <p>Annual meetings are held with the ABs to review changes, such as to the program. Also to check that the ABs are auditing the CBs accredited to the program.</p>	<ul style="list-style-type: none"> • Annual review 2021 • Section VII • IAF MLA Document • The IAF MLA stipulates (pg 5) • https://iaf.nu/iaf_system/uploads/documents/IAF_MLA_0112-Secretariat-Comments-13102019.pdf

B . 1 A C C R E D I T A T I O N

B.1.07 Transparency

GSSI Component	Guidance	
The Scheme Owner ensures that the accreditation body is transparent about its organizational structure and the financial and other kinds of support it receives from public or private entities.	<p>Scheme owner ensures accreditation body transparency regarding organizational structure and financial support. The Scheme Owner requires disclosure of this information directly from the accreditation body.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> - accreditation body website with information, certification/ accreditation manuals, contracts and/or agreements. - agreement/contract between the Scheme Owner and certification body to use national accreditation bodies which are IAF members and signatories to the Multilateral Recognition Arrangement for ISO 17065; - annual or periodic reports. 	
Conclusion		References
<p>The RFM Program is in alignment because the QMS states is Section 6.1.6 part 2)</p> <p>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.</p> <p>CSC requires CBs to use an Accreditation Body that is a member of IAF (International Accreditation Forum) and a signatory to the IAF Multilateral Recognition Arrangement (MLA) for ISO-17065.</p>		<ul style="list-style-type: none"> • MoU • QMS, RFM Certification Program, Version 5.1, • Section 6.1.6 • https://rfmcertification.org/wp-content/uploads/2022/11/QMS-V5.1-Nov-2022_2.pdf

B.1.08 Office Audit

GSSI Component	Guidance
The Scheme Owner ensures that the accreditation	<p>The Scheme Owner specifies that accreditation includes an on-site audit of the certification body.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> - accreditation/certification requirements/methodologies, accreditation body office audit reports, audit schedule.

B . 1 A C C R E D I T A T I O N

B.1.08 Office Audit

process includes an on-site audit of the certification body.	<ul style="list-style-type: none"> - specified in accreditation body or certification body contracts/ agreements. - agreement/contract between the Scheme Owner and certification body to use national accreditation bodies which are IAF members and signatories to the Multilateral Recognition Arrangement for ISO 17065.
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Conclusion	References
<p>The RFM Program is in alignment because as a member of the IAF, the inclusion of an Office Audit is part of the standard approach for the ANAB accreditation process.</p> <p>The QMS Section 6.1.6 part 3) requires: The accreditation process includes an office/remote assessment audit of the Certification Body.</p> <p>Remote audit was allowed due to Covid extraordinary procedure</p> <p>Procedures 1 and 3 refer to requirements for CBs and the issuance of certificates whilst the CBs are seeking extension of their accreditation for RFM.</p> <p>Procedure 1, section 3.2 states: Until full accreditation is achieved the Certification Body's certificates under the RFM Program must not contain the accreditation logo. Certification Bodies will be allowed an agreed amount of certification activity to allow for accreditation to be facilitated. Certification Bodies in the accreditation evaluation process can issue non-accredited certificates.</p> <p>Procedure 3, Section 8 states: Until full accreditation is achieved the Certification Body's certificates under the RFM Program must not contain the accreditation logo. The Certification Body will be allowed an agreed amount of certification activity to allow for accreditation to be facilitated. A Certification Body in the accreditation evaluation process can issue non-accredited certificates.</p>	<ul style="list-style-type: none"> • CB annual audit – SCS • CB annual audit- NSF/GT • QMS, RFM Certification Program, Version 5.1 <ul style="list-style-type: none"> • Section 6.1.6 • https://rfmcertification.org/wp-content/uploads/2022/11/QMS-V5.1-Nov-2022_2.pdf • RFM Procedure 1 Version 5.1: Certification Body Approval for the RFM Fishery Standard, <ul style="list-style-type: none"> • Section 3.2 • https://rfmcertification.org/wp-content/uploads/2022/11/Procedure-1-V5.1-Nov-2022_2.pdf • RFM Procedure 3 Version 5.1: Certification Body Approval for Chain of Custody Standard, <ul style="list-style-type: none"> • Section 8

B . 1 A C C R E D I T A T I O N

B.1.08 Office Audit

The Program undertakes annual audits of CBs to review policies, procedures, evidence, records etc. This includes checks on audits by Accreditation Bodies. The annual audits for 2 CBs are provided and show the following

SCS report 1st Sept 2022 – page 4

GSSI ref B1.08 The Scheme Owner ensures that the accreditation process includes an on-site audit of the certification body. [B108]

The Scheme Owner ensures that the accreditation process includes an on-site audit of the certification body.

"Due to Covid ANAB are still conducting virtual office audits every year on SCS, plus a virtual review of witness audit. The last witness audit were done at Aquamar 31 August 2022 on SCS auditor Emma Goldstein by ANAB's Susan Rank. These audits are specifically for the CSC program. One observation was found by ANAB at the office audit that a SCS client that was no longer certified was still on the CSC website. SCS had informed CSC, see summary for feedback and action from CSC. No observations were noted by ANAB at the witness audit".

NSF Global Trust annual audit – 12th Sept 2-22 (page 9)

GSSI ref B1.08 The Scheme Owner ensures that the accreditation process includes an on-site audit of the certification body. [B108]

The Scheme Owner ensures that the accreditation process includes an on-site audit of the certification body. This did happen in Aug 22 and was the first onsite since 2019 due to the Global COVID 19 Pandemic. The CB shared the relevant findings of the Audit. No RFM issues were raised. However INAB did not complete a full technical audit and are due to come back to GTC in Nov 2022- Plan is to look at the changes in the COC V 2.5 as well to allow an extension of the GTC accreditation to cover this new standard

- https://rfmcertification.org/wp-content/uploads/2022/11/Procedure-3-V5.1-Nov-2022_2.pdf
- RFM Procedure 9, Version 1.1 CSC RFM Extraordinary Event and Remote Assessment or Audit Procedure,
- https://rfmcertification.org/wp-content/uploads/2022/11/Procedure-9-V5.1-Nov-2022_2.pdf

B . 1 A C C R E D I T A T I O N

B.1.09 Field Audit		
GSSI Component	Guidance	
The Scheme Owner ensures that the accreditation process includes a review of the performance of certification bodies and auditors, using witness audits.	<p>The Scheme Owner specifies that accreditation includes a performance review of certification bodies and auditors, that may include desktop reviews, office visits, witness audits.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> - accreditation/certification requirements/methodologies, accreditation body audit reports, audit schedule, specified in accreditation body or certification body contracts/agreements. - agreement/contract between the Scheme Owner and certification body to use national accreditation bodies which are IAF members and signatories to the Multilateral Recognition Arrangement for ISO 17065. 	
Conclusion	References	
<p>The RFM Program is in alignment because as a member of the IAF, the inclusion of a review of CB performance in the field is part of the standard approach for the ANAB.</p> <p>The QMS 6.1.6, part 4) requires; 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</p> <p>The Memorandum of Understanding between CSC and ANAB, which sets ANAB as the AB which will assess the competence of certification bodies seeking to participate in the RFM program, includes the following clause: "ANAB will provide ongoing monitoring of CBs activities and assurance of compliance via regular surveillance and witness assessments, consistent with ANAB accreditation program and IAF and ILAC guidance. If specified by the CSC, ANAB will also undertake additional surveillance activities related to CBs providing certification in accordance with the RFM Program requirements."</p> <p>In annual audits, this is checked with CBs.</p> <p>SCS annual audit – 1st Sept 22 (page 5)</p>	<ul style="list-style-type: none"> • Annual audit – SCS • CB annual audit – NSF/GT • MoU – CSC and ANSI • MRAG – application letter • MRAG Initial assessment – request for approval • MRAG welcome letter from RFM • QMS, RFM Certification Program, Version 5.1, • Section 6.1.6 • https://rfmcertification.org/wp-content/uploads/2022/11/QMS-V5.1-Nov-2022_2.pdf 	

B . 1 A C C R E D I T A T I O N

B.1.09 Field Audit

Due to Covid ANAB now conducts virtual witness audits on SCS . These audits are specifically for the CSC program. No NC were identified at the last witness audit on 31 Aug 2022

NSF-GT annual audit (12th sept 22)

A witness audit has been arranged by the AB INAB in Oct but only for CoC . GTC informed that INAB has not done one for any Fishery work for a number of years

B . 2 C E R T I F I C A T I O N

B.2 CERTIFICATION

B.2.01 ISO-17065 Compliance

GSSI Component	Guidance
The Scheme Owner requires that certification bodies operating in the scheme are accredited to conduct certifications for the scope of their respective standards in conformance with ISO/IEC 17065 in its applicable version.	<p>The Scheme Owner has a contract, memorandum of understanding or enforceable arrangement with certification body that require to follow the principles of ISO/ IEC 17065 for the scope of the respective standard of the scheme.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none">- contracts, memorandums of understanding and/or memorandum of agreements between Scheme and accreditation bodies or certification bodies that specify certification bodies be accredited with ISO 17065- accreditation manual or certification requirements/methodologies; certification bodies certificate of accreditation.
Conclusion	References
<p>The RFM Program is in alignment because CBs wishing to apply to assess against the RFM CC Standard must first, as a pre-requisite, be accredited to ISO 17065 “General requirements for bodies operating certification systems” or have a recognized credibility as a certification body operating in Fishery Management Certification.</p> <p>Certification Bodies without formal ISO 17065 accreditation must confirm that they are in an application process to attain this accreditation through a recognized Accreditation Board and that they are committed to attaining the accreditation within the agreed timelines.</p> <p>Additionally, the contract between CSC and CBs conducting assessments includes the following paragraph: "The signed CB represents that it will maintain accreditation to the General Requirements for Bodies Operating Product Certification Systems that are established in</p>	<ul style="list-style-type: none">• CB annual audit – NSF-GT• CB annual audit – SCS• MRAG 2021 initial assessment – request for approval• MRAG request for application• MRAG welcome letter from CS• QMS, RFM Certification Program, Version 5.1, N• Section 6.1.6

B . 2 C E R T I F I C A T I O N

B.2.01 ISO-17065 Compliance

International Organization for Standardization/ International Electro-Technical Commission ISO 17065 and other International Accreditation Forum (IAF) regulatory documents including Guide 5."

Further information on the accreditation status for MRAG

MRAG submitted letter (provided) addressing clauses 3.2 and 3.3 of Procedure 1.

A copy of MRAG correspondence with ANAB indicating MRAG application has been accepted by ANAB (copy provided)

Copy of welcome letter from CSC to MRAG (provided)

Copies of annual office audits for two CBs are also provided

- https://rfmcertification.org/wp-content/uploads/2022/11/QMS-V5.1-Nov-2022_2.pdf
- RFM Procedure 1 Version 5.1: Certification Body Approval for the RFM Fishery Standard,
 - Section 3.1
 - https://rfmcertification.org/wp-content/uploads/2022/11/Procedure-1-V5.1-Nov-2022_2.pdf

B.2.02 Fee Structure

GSSI Component	Guidance
The Scheme Owner requires certification bodies 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, fish farm or chain of custody. The fee structure is non-discriminatory and takes into account the special circumstances and requirements of developing countries and countries in transition.	<p>The Scheme Owner defines this requirement in the contract, memorandum of understanding or enforceable agreement with the accreditation body and/or certification body.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> - accreditation manual/certification requirements/methodologies. - possibly also review accreditation body audit reports that this requirement is verified, and for compliance of certification bodies on this requirement. - policy or procedure which outlines how fee structures of certification bodies could address special requirements of developing and in transition countries in a non-discriminatory manner; certification body fee structure and policy (online or request).

B . 2 C E R T I F I C A T I O N

B.2.02 Fee Structure

Conclusion

The RFM Program is in alignment because the QMS in Section 4.1.1 requires:

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.

Clause 4 of the Contract between the CB and CSC shows that CSC "Upon written request and after receipt of an applicant complaint, the CSC reserves the right to challenge the signed CB if they deem the fee structure to be unacceptable and not in keeping with current market values".

As the scheme is based in the USA, the prices are in \$US.

CSC verifies compliance at annual CB office audit.

Annual audits of CBs checks the existence of fee structures. This is shown (onscreen for remote audits) to evidence they exist and that they are standard for applicants.

SCS audit (page 5)

Fee Structure adequate to support accurate and truthful assessments commensurate with the scale, size and complexity of the applicant, or surveillance activities.

SCS communicated that the fee structure is the same as the MSC standard. They employ a flat rate for the day audit required to assess applicants against CoC requirements. All SCS RFM CoC audits are completed in conjunction with MSC audits. However, Jason Swecker stated that geographic daily rates would be applicable to ensure that the assessment rates charged by SCS were competitive.

NSF-GT (see clause 2.02)

A GTC fee structure for audits and assessments is in place.

References

- Annual audit of CB - NSF-GT
- Annual audit of CB - SCS
- Contract between CSC and CB
- QMS, RFM Certification Program, Version 5.1
 - Section 4.1.1
 - https://rfmcertification.org/wp-content/uploads/2022/11/QMS-V5.1-Nov-2022_2.pdf

B . 2 C E R T I F I C A T I O N

B.2.02 Fee Structure

Fees are calculated based on a set daily rate, which is the same for all clients. The total estimated cost is based on the estimated number of days required to complete the certification process. A master control form was observed and there are different daily rates applied by GTC based on the geographical location of the client

B.2.03 Certification Cycle

GSSI Component	Guidance
The Scheme Owner defines that the validity of a certification cycle does not exceed 5 years in the case of fishery or 3 years in the case of aquaculture certification and 3 years in the case of chain of custody certification.	<p>The Scheme Owner defines this requirement in the contract, memorandum of understanding or enforceable agreement with the accreditation body and/or certification body.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> - accreditation manual/certification requirements/methodologies. Issued certificates with validity (online database or on request)
Conclusion	References
<p>The RFM Program is in alignment because the QMS includes the following Clause 4.1.2</p> <p>The validity of a fishery certification shall not exceed five years unless an extension is granted for cause. The Chain of Custody certificate has a duration of 3 years.</p> <p>CSC verifies compliance at annual CB office audit</p> <p>Annual office audits are undertaken for each CB. The issuance of certificates is checked as part of that audit.</p> <p>SCS office audit (pg 5) - covered CoC only. The Certification cycle for Chain of Custody is 3 years. This was verified.</p>	<ul style="list-style-type: none"> • Annual audit of CB - NSF-GT • Annual audit of CB - SCS • QMS, RFM Certification Program, Version 5.1 <ul style="list-style-type: none"> • Clause 4.1.2 • https://rfmcertification.org/wp-content/uploads/2022/11/QMS-V5.1-Nov-2022_2.pdf

B . 2 C E R T I F I C A T I O N

B.2.03 Certification Cycle

NSF-GT (covered both fishery and CoC)

The Certification cycle for fisheries is 5 years and CoC is 3 years plus 8 weeks to allow for recertification. This was verified and is still the case. No issues with CoC certifications and their duration were identified this year, however on reviewing the CSC website 9 GTC certs for CoC had expired.

CSC had been informed by GTC to remove or update these certificates

B.2.04 Surveillance

GSSI Component

The Scheme Owner requires that certification bodies carry out periodic surveillance and monitoring at sufficiently close intervals to verify that certified operations continue to comply with the certification requirements. For aquaculture operations, this shall be on an annual basis.

Guidance

The Scheme Owner defines this requirement in the contract, memorandum of understanding or enforceable agreement with accreditation body and/or certification body. Scheme owner risk assessment system should identify “sufficient close intervals”.

Examples of evidence for scheme alignment:

- accreditation manual/certification requirements/methodologies.
- Scheme Owner internal risk assessment system with assessment reports.
- Audit reports, schedules and issued certificates.

Conclusion

The RFM Program is in alignment because the RFM QMS includes the following in Section 4.1.3: Certification Bodies are required to carry out periodic surveillance and monitoring at sufficiently close intervals to verify that certified fisheries and CoC certificate holders continue to comply with the certification requirements.

The surveillance process is also laid out in RFM Procedure 2, Section 4

References

- File note – sablefish
- Explains the circumstances regarding the sablefish certification variance
- QMS, RFM Certification Program, Version 5.1

B . 2 C E R T I F I C A T I O N

B.2.04 Surveillance

To ensure that a certified fishery remains in compliance with the requirements of certification, surveillance audits will take place at least annually and more frequently, if deemed necessary by the Certification Body. Audits may be undertaken on short notice (i.e. unscheduled audits), if deemed necessary by the Certification Body.

and Procedure 4, Section 9: Surveillance audits (except for traders) are scheduled within 4 months of the end of the 12-month intervals following the initial audit, with no audits occurring within 6 months of the previous audit. Surveillance audits for traders is are scheduled within 4 months of the end of 18- month intervals from the initial audit and is conducted by the certification body using an approved remote assessment methodology, based on documentation submitted by the trader for review. In all cases, the Certification Body ultimately reserves the right to determine Surveillance Audit frequency based upon the inherent product/process risk as well as the results of an Applicant's prior assessments and audits. Audits may be undertaken on short notice (i.e. unscheduled audits), if deemed necessary by the Certification Body.

Additional clarification is provided regarding sablefish. The variation to the certification and surveillance cycle was due to specific circumstances.

The file note provided shows the events that occurred between April 2022 to October 2022, and provides explanations for the variations to the normal audit cycle. In summary, following a change in certificate holder, certification was temporarily withdrawn, then re-established following a surveillance audit . This surveillance audit resulted in the withdrawal being terminated, and a new Certificate was issued. The new certification date was set as the 3rd June 2022 (date of the 5th surveillance announcement) and the expiry date was set as 9th April 2023, to take account of the time required to complete a full re-assessment of the fishery.

A new application for the re-assessment of the fishery has been received in October 2022 and the re-assessment will be announced in due course on the CSC RFM website.

- Section 4.1.3
- https://rfmcertification.org/wp-content/uploads/2022/11/QMS-V5.1-Nov-2022_2.pdf
- RFM Procedure 2, Version 6.1: Application to Certification Procedures for the RFM Fishery Standard,
 - See section 4
 - https://rfmcertification.org/wp-content/uploads/2022/11/Procedure-2-CSC_Final-Nov-2022.pdf
- RFM Procedure 4 Version 5.1: Application to Certification Procedures for the RFM Unified Chain of Custody Standard,
 - Section 9
 - https://rfmcertification.org/wp-content/uploads/2022/11/Procedure-4-CSC_Final-Nov-2022.pdf

B . 2 C E R T I F I C A T I O N

B.2.05 Assessment Methodology

GSSI Component	Guidance
The Scheme Owner ensures that certification bodies apply a consistent methodology to assess compliance with the standard.	<p>The Scheme Owner defines the methodology to assess compliance with the standard. An internal assessment (updated regularly) with clear outcomes, identifies if the methodology is consistent between certification bodies or if the methodology needs revising.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> - certification requirements/methodologies, - contracts and agreements with the certification body, - guidance interpretation documents, - Scheme Owner internal assessment system with assessment reports, - training and calibration records.
Conclusion	References
<p>The RFM Program is in alignment because the methodology to be used to assess compliance with the Standard is described in RFM Procedures 2 and 4.</p> <p>This includes assigning personnel, pre-assessment, assessment (including on-site assessment, desktop assessment, and the production of an assessment report), and surveillance assessments.</p> <p>Furthermore, annual reviews have been carried out on both CBs. These have a consistent approach in line with ISO 17065 requirements. The reviewers are the same for both CBs.</p> <p>Samples of evidence are available for CoC 3 multi site reports, one single site report. Fishery reports/assessment are all published online</p>	<ul style="list-style-type: none"> • CB annual audit – NSF–GT • CB annual audit – SCS • CoC audit reports – 4 examples provided • QMS, RFM Certification Program, Version 5.1, N <ul style="list-style-type: none"> • Section 4.1.4 • https://rfmcertification.org/wp-content/uploads/2022/11/QMS-V5.1-Nov-2022_2.pdf • RFM Procedure 2, Version 6.1: Application to Certification Procedures for the RFM Fishery Standard,

B . 2 C E R T I F I C A T I O N

B.2.05 Assessment Methodology

In addition there are 2 annual CB reports which include reviewing evidence around undertaking the program. These are typically covered in CB procedures / manuals;

SCS annual audit report – pg 6 states: The CSC P 4 on Chain of Custody Application procedures has been reviewed against the SCS main Qualitymanual_V6 May 2022. The procedures were reviewed and have been found to be consistent with one another with respect to auditing and certification methodology application.

NSF-GT states: All processes were reviewed and were in alignment with the current RFM QMS Procedures 2 and 4. GTC have now started back to doing on site audits following Covid and these started again in April 2022. The unified CoC standard 2.5 will be used on clients in 2023 and will be technically reviewed by INAB in Oct 2022 to allow GTC to extend their scope of accreditation to include this new version

- https://rfmcertification.org/wp-content/uploads/2022/11/Procedure-2-CSC_Final-Nov-2022.pdf
- RFM Procedure 4 Version 5.1: Application to Certification Procedures for the RFM Unified Chain of Custody Standard,
- https://rfmcertification.org/wp-content/uploads/2022/11/Procedure-4-CSC_Final-Nov-2022.pdf

B.2.06 Termination, Suspension, Withdrawal

GSSI Component	Guidance
The Scheme Owner ensures that certification bodies have consistent documented procedure(s) 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.	<p>For accurate and consistent implementation of the standard, the Scheme Owner ensures that certification bodies have 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.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none">- contract, memorandum of understanding or enforceable agreement between the Scheme Owner and the certification body; accreditation manual, certification requirements/methodologies,- audit reports,- guidance documents specifying the conditions under which certification may be suspended or withdrawn.

B . 2 C E R T I F I C A T I O N

B.2.06 Termination, Suspension, Withdrawal

Conclusion	References
<p>The RFM Program is in alignment because Clause 4.1.5 of the RFM QMS states: 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.</p> <p>The outcome of the Certification Committee review may result in additional requirements including: A revision in action plans and timelines; A requirement for new corrective actions to be implemented; Immediate close out of non-conformances and; Suspension of the Certificate until such time as the specified requirements are fulfilled.</p> <p>Where continued failure to progress action plans for the closure of non-conformances ensues the certificate shall be placed in suspension pending a full review by a CB with respect to continued certification or certificate withdrawal.</p> <p>Where the Certification Committee determines that the fishery no longer meets the requirements for certification suspension or withdrawal shall be initiated. A CB shall inform the client in writing of its intention to suspend or withdraw the certificate with a written rationale for its decision.</p> <p>Where a Client refuses to undertake additional re-assessment or fails to provide sufficient access for re-assessment purposes, the Client certificate will be suspended pending potential withdrawal based on the outcome of a review by the CB Program Manager.</p> <p>The Client shall be given 28 days to provide further evidence in respect of the decision of suspension. Such evidence shall be reviewed by the CB Program Manager who may convene a Certification Committee as part of this review.</p> <p>If on the outcome of the review, a CB determines that the fishery or part of the fishery is failing to meet the requirements of certification it shall provide the Client 28 days notice of its intention to withdraw the certificate in advance of the intended withdrawal.</p>	<ul style="list-style-type: none">• CB audit reports<ul style="list-style-type: none">• One report for NSF-GT• One report for SCS• CoC audit reports – 4 examples provided• QMS, RFM Certification Program, Version 5.1,<ul style="list-style-type: none">• Section 4.1.5• https://rfmcertification.org/wp-content/uploads/2022/11/QMS-V5.1-Nov-2022_2.pdf

B . 2 C E R T I F I C A T I O N

B.2.06 Termination, Suspension, Withdrawal

There have been no suspensions or withdrawals as yet.

Samples of evidence are available for CoC

3 multi site reports, one single site report.

Fishery reports/assessment are all published online

In addition there are 2 annual CB reports which include reviewing evidence around undertaking the program. These are typically covered in CB procedures / manuals;

SCS annual audit report – pg 7 states

SCS Program Quality Manual V6 May 2022 Section 16 deals with certification suspension and termination

a) documented procedure(s) 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.

b) records for suspensions or terminations of certificates

NSF-GT states

Procedure and records for suspensions or terminations of certificates? Any withdrawn certificates?

Checked. None withdrawn or suspended in the past 12 month period and GTC still have the same processes in place to action these requirements when appropriate.

B.2.07 Multi-site Certification

GSSI Component	Guidance
The Scheme Owner requires that certification bodies follow procedures and guidance for multi-site	If the Scheme Owner explicitly does not allow multi-site certification (prohibits, not that it is not yet developed or exists) requirement is “Not applicable”. Otherwise, the Scheme Owner requires certification body to follow have documented procedures and guidance for multi-site certification, detailed in the agreement or in the standards

B . 2 C E R T I F I C A T I O N

B.2.07 Multi-site Certification

certifications as written in the standard or other scheme documents, if allowed under the scheme.	<p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> - memorandum of understanding or enforceable agreement between the Scheme Owner and the certification body; - requirements and guidance for multi-site certification - audit reports.
Conclusion	References
<p>This GSSI Component is not applicable to the fishery standard of the RFM Program because multi-site certification is not applicable to fishery certification.</p> <p>However multi-site certification is allowed within chain of custody</p> <p>Procedure 4 refers to multi-site application procedures and requirements</p>	<ul style="list-style-type: none"> • Procedure 4: Application to Certification Procedures for the RFM Chain of Custody Standard • https://rfmcertification.org/wp-content/uploads/2022/08/Procedure-4-CSC_Final.pdf

B.2.08 Audit Reports

GSSI Component	Guidance	
The Scheme Owner requires certification bodies to ensure consistency in audit report formats and in how the reports are completed.	<p>The Scheme Owner defines this requirement for certification bodies and has some system for quality control.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> - contract/agreement between the Scheme Owner and the certification body, certification requirements/methodologies; - guidance specifying formats for audit reports and reporting, mandatory audit templates; - review online audit reports for consistency of report format and reporting, Scheme Owner quality management system for review of audit reports. 	
Conclusion	References	
The RFM Program is in alignment because CSC QMS requires in Section 4.1.7: Certification Bodies shall use consistent formats for assessment and audit reports and reporting.	<ul style="list-style-type: none"> • Annual internal review 2021 • CB Audit reports x2 	

B . 2 C E R T I F I C A T I O N

B.2.08 Audit Reports

Annual audits of CBs will ensure that the reports cover the requirements stipulated in the QMS.

This is checked at the annual audit for CBs

Samples of evidence are available for CoC

3 multi site reports, one single site report.

Fishery reports/assessment are all published online

In addition there are 2 annual CB reports which include reviewing evidence around undertaking the program. These are typically covered in CB procedures / manuals;

SCS annual audit report – pg 7 states

Audit reports are consistent with one another.

AS confirmed that their audit reports are consistent with one another since they are internally reviewed, and because the number of auditors and certificates is quite limited. All their audit reports are available. AS described the technical review process and stated they have checklist for the MSC CoC which now includes details for the RFM.

ASr described the calibration notes that he circulates to the auditors after he conducts spots checks on reports . Mainly done for MSC COC as they conduct more assessments, but RFM CoC is included

NSF-GT states

Fishery Audit reports were available to review online.

COC Audit reports are available on request. NSF/ GTC has a process that audit reports could be made available upon request.

CoC and Fishery Technical review and certification process are now fully aligned to RFM requirements

- 1. NSF=GT
- 2. SCS
- CoC reports x4
- QMS, RFM Certification Program, Version 5.1,
- Section 4.1.7
- https://rfmcertification.org/wp-content/uploads/2022/11/QMS-V5.1-Nov-2022_2.pdf

B . 2 C E R T I F I C A T I O N

B.2.09 Participation and Consultation

GSSI Component	Guidance
The Scheme Owner requires that certification bodies have in place consistent procedures for stakeholders to provide input during the certification process.	<p>The Scheme Owner defines this requirement for certification bodies to have a documented procedure to enable input from all stakeholders during the certification process.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> - contract/agreement between the Scheme Owner and the certification body, certification requirements/methodologies specifying requirements for mechanism for stakeholder input during certification process. - guidance specifying procedures. - review certification body process for input: - publicly available information for stakeholder input, public announcements, audit work plans, requests for input. - audit reports with stakeholder input.
Conclusion	References
<p>The RFM Program is in alignment because Clause 4.1.8 RFM QMS states:</p> <p>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.</p> <p>All comments will be made to the CB.</p> <p>"This is about stakeholder input and requiring evidence of how long stakeholders have to respond</p>	<ul style="list-style-type: none"> • CB annual audit – NSF • File note – sablefish <ul style="list-style-type: none"> • Explains the circumstances around the sablefish certification 2021-22 • QMS, RFM Certification Program, Version 5.1, <ul style="list-style-type: none"> • Clause 4.1.8 • https://rfmcertification.org/wp-content/uploads/2022/11/QMS-V5.1-Nov-2022_2.pdf

B . 2 C E R T I F I C A T I O N

B.2.09 Participation and Consultation

Stakeholder input is sought as part of the fishery assessment process. This is covered in CB procedures which are checked at the annual CB audit.

NSF-GT audit report states

Stakeholder input during Fishery certification process – tThere were no issues with Stakeholder input and a process exists for engagement.

In respect of the sablefish fishery, and the 5th surveillance audit, this was an exceptional circumstance that necessitated a different approach, agreed with the CB and CSC. The file note explains the timescales around this and how this varied from typical procedures."

Training deck covers this aspect as well

reviewed in annual meeting with CBs to ensure producer is working

B.2.10 Non-compliances

GSSI Component	Guidance
The Scheme Owner requires that certification bodies follow its requirements for determining non-compliances, verifying corrective actions arising from non-compliances and	<p>For accurate and consistent implementation of the standard, the Scheme Owner ensures that certification bodies follow non-compliances, verifying corrective actions arising from non-compliances, and allowing for appeals of non-compliances.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> - contract, memorandum of understanding or enforceable agreement between the Scheme Owner and the certification body. - accreditation manual, certification requirements/methodologies. - guidance documents, determining non-compliances, verifying corrective actions arising from non-compliances and allowing for appeals of non-compliances, in order to support consistency between certification bodies. - audit reports.

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B.2.10 Non-compliances

allowing for appeals of non-compliances. – standards.

Conclusion

The RFM Program is in alignment because the procedure for determining non-compliances is described in RFM QMS Section 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.

Also see

RFM Procedure 2 (for fisheries) and Procedure 4 (for CoC).

The same documents also describes the process for Appeals and Corrective Actions.

Procedures for identifying and addressing NCs are checked as part of the CB annual audits.

DNV annual audit report (pg 7-8)

AB Audit. An AB Office and Witness audit have been carried out remotely since the last RFM Audit. One observation from the office audit was identified and no NC were highlighted during the auditor witness assessment

Internal audit. The last internal audit was conducted by VN Oct 2021 and this raised 4 NCs on the need to sign the agreement before certificates are sent a new process has been adopted to ensure that this will not

References

- CB office audits – x 2
 - 1. NSF-GT
 - 2. SCS
- Crab fishery report 2022
 - Section 10
 - https://rfmcertification.org/wp-content/uploads/2022/03/AK-RFM-BSAI-Crab-Form-9d-RFM-CSC-2nd-reassessment-Certification-Report-3_12_2022-002.pdf
- Halibut fishery report – 2021
 - pg 73
 - https://rfmcertification.org/wp-content/uploads/2021/07/Form-9g-AK-RFM-Pacific-Halibut-surveillance-4-report_FINAL.pdf
- Halibut fishery report 2017
 - pg 263
 - <https://rfmcertification.org/wp-content/uploads/2021/06/Alaska-RFM-Final-Full-Assessment-Halibut-Report-Jan-2017-final.pdf>
- Halibut fishery report 2019
 - pg 95
 - https://rfmcertification.org/wp-content/uploads/2021/06/Form-9g-AKRFM-Halibut-3rd-Surveillance-Report-9_19_2019.pdf

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B.2.10 Non-compliances

occur in future and came into place in April 2022 . The next internal audit to ensure changes have become effective will be Oct 2022.

NSF-GT audit report states
No issues raised.

In relation to NCs raised in fishery assessments, RFM is compliant as the additional evidence shows a series of fishery reports including NCs, action plans and subsequent closing of any NCs.

Halibut reports show an NC being brought forward and then resolved. In 2017 the report identified NC's and an Action Plan was constructed. 2019 one NC was resolved with the second and last NC being cleared in 2021.

Crab had NC's which were resolved in the same year. See Section 10 of the fishery report

Salmon which has not had all (NC's) been closed off due to the duration of the agreed Action Plan. Salmon had NC's ID'd in 2016/17 and have been part of each assessment with significant progress to closing out the NC's. The 2021 has a summary.

- QMS, RFM Certification Program, Version 5.1,
 - Section 4.1.10
 - https://rfmcertification.org/wp-content/uploads/2022/11/QMS-V5.1-Nov-2022_2.pdf
- RFM Procedure 2, Version 6.1: Application to Certification Procedures for the RFM Fishery Standard,
 - https://rfmcertification.org/wp-content/uploads/2022/11/Procedure-2-CSC_Final-Nov-2022.pdf
- RFM Procedure 4 Version 5.1: Application to Certification Procedures for the RFM Unified Chain of Custody Standard,
 - https://rfmcertification.org/wp-content/uploads/2022/11/Procedure-4-CSC_Final-Nov-2022.pdf
- Salmon fishery report 2021
 - pg 298
 - https://rfmcertification.org/wp-content/uploads/2021/06/AK_SAL-Alaska-salmon-2nd-Reassessment-Report-Final-1

B.2.11 Site Audit

GSSI Component	Guidance
The Scheme Owner requires that the scope of the (re-)	The Scheme Owner requires that the scope of the audit (initial, annual or re-assessment) includes on-site assessment of premises covered by the scope of the standards and within which one or more key activities are performed.

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B.2.11 Site Audit

certification audit includes a visit to locations pertinent to the scope of the certification.

Examples of evidence for scheme alignment:

- contract, memorandum of understanding or enforceable agreement between the Scheme Owner and the certification body,
- accreditation manual, certification requirements/methodologies,
- guidance documents specifying procedures for determining site visits including sampling,
- review audit reports.

Conclusion

The RFM Program is in alignment because the requirement for site visits is included within the QMS Section 4.1.11: The scope of the full assessment or reassessment shall include, when necessary, a site visit or site visits, as appropriate.

Also in RFM Procedure 2 (for fisheries) and 4 (for CoC).

The RFM QMS Procedure 2 states:

3.1.13 The site fishery assessment shall be conducted in accordance with the agreed plan; any required deviations from the plan shall be approved by the Certification Body Program Manager.

The site assessment shall take further opportunity, as necessary, to verify particular aspects of the assessment directly, through local consultation with fishery managers, the Client group, fishery participants, and relevant stakeholders. On-site meetings with management organizations also provide an opportunity for additional information to be gathered and verified.

The on-site portion of the investigation shall be communicated to all those identified in the plan as requiring an on-site meeting, preferably 30 days prior to the date requested. This period may be shortened with the consent of affected parties. The applicants shall be advised of all on-site activities.

References

- Procedure 2 Application to Certification Procedures for the RFM Fishery Standard
- https://rfmcertification.org/wp-content/uploads/2022/08/Procedure-2-CSC_Final.pdf
- Procedure 4: Application to Certification Procedures for the RFM Chain of Custody Standard
- https://rfmcertification.org/wp-content/uploads/2022/08/Procedure-4-CSC_Final.pdf
- Quality Management System
- Section 4.1.11
- https://rfmcertification.org/wp-content/uploads/2022/08/QMS-Chapters-1-7_Final.pdf

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B.2.11 Site Audit

A summary from each on-site meeting shall be documented in the Assessment Report, from both the Application Validation and the full assessment site visits, as appropriate.

The RFM QMS Procedure 4 states for CoC in Section 7.1

The Certification Body will determine the site assessment length based on the associated risks that were used to determine the applicant's assessment plan.

The onsite assessment shall include:

An open meeting; to confirm the scope of the applicant's assessment

A review the traceability and quality management systems and assessment of their implementation;

An inspection of the production facility to verify implementation of the traceability systems

Interviews of personnel responsible for oversight and operation of the traceability and quality management systems;

A review of the production facility inspection to verify compliance of the reviewed systems with the requirements of the RFM CoC Standard and to determine whether further documentation and verification is needed;

A final review of findings in preparation for the closing meeting; and

A closing meeting to discuss compliance with the RFM CoC Standard.

B.2.12 Transparency

GSSI Component	Guidance
The Scheme Owner requires that a list of	<p>The Scheme Owner makes publicly available a list of certified entities either directly or requires of certification bodies/accreditation bodies.</p> <p>Examples of evidence for scheme alignment:</p>

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B.2.12 Transparency

certified entities is made publicly available.	- system to show the certification status of entities is publicly available online (e.g. database or online certificate list). If this system is outsourced to the accreditation bodies or certification bodies, this is required and the system described in the contract/ agreement between the Scheme Owner and the accreditation body/certification body, in a separate accreditation manual or certification requirements/methodologies.
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Conclusion	References
The RFM Program is in alignment because a list of certified fisheries and organizations is published on the RFM website, along with all associated reports and other paperwork.	<ul style="list-style-type: none"> • Certified fishery species webpage • https://rfmcertification.org/certified-fishery-species/

B.2.13 Transparency

GSSI Component	Guidance
For fisheries, the Scheme Owner requires certification bodies to make full audit reports available on request after certification has been granted, while excluding commercially sensitive information.	<p>Applicable only to fisheries, for Aquaculture “Not Applicable”. The Scheme Owner defines this requirement for certification bodies to make full audit reports, after certification has been granted, available online or upon request. Commercially sensitive information is excluded. Contracts with certified entities should clearly give notice of this requirement.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> - contract/agreement between the Scheme Owner and the certification body, contract with certification body and certified entity with this requirement, - certification requirements/methodologies specifying requirement, - guidance specifying that making reports available to stakeholders happens in a timely manner, - review certification body website for posted reports or process for responding to requests.

Conclusion	References
The RFM Program is in alignment because Summary Fisheries Audit Reports are available from the RFM website alongside the full assessment reports.	<ul style="list-style-type: none"> • Certified fishery species webpage • https://rfmcertification.org/certified-fishery-species/

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B.2.13 Transparency

An Alaska salmon example is provided in the evidence

CSC can make CoC available only if the Applicant / Client provides permission that the report can be shared with a third party (in line with ISO 17065 requirements)

- Example of species information and reports
- <https://rfmcertification.org/certified-fishery-species/alaska-salmon/>

B.2.14 Transparency

GSSI Component	Guidance	
For aquaculture, the Scheme Owner requires certification bodies to make summary audit reports publicly available (excluding commercially sensitive material information) after certification has been granted.	<p>Applicable only to Aquaculture. For Fisheries “Not Applicable”. The Scheme Owner defines this requirement for certification bodies to make summary audit reports, after certification has been granted, publicly available. Commercially sensitive information is excluded. Contracts with certified entities should clearly give notice of this requirement.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> - contract/agreement between the Scheme Owner and the certification body, contract with certification body and certified entity with this requirement. - certification requirements/methodologies specifying requirement. - guidance specifying that making reports available to stakeholders happens in a timely manner. - certification body website for posted reports. 	
Conclusion		References
This GSSI Component is not applicable to the RFM Program because the RFM Program does not cover Aquaculture.		

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B.2.15 Notification of Changes

GSSI Component	Guidance
The Scheme Owner notifies accreditation bodies, certification bodies and certified entities of any change in management procedures which affects scheme rules and procedures for accreditation or certification.	<p>The Scheme Owner has a system to ensure that accreditation bodies, certification bodies and certified entities are notified in a timely manner of any substantive change in management procedures. This is defined as changes which affect scheme rules and procedures for accreditation and/or certification. Where the scheme outsources responsibility of notification to accreditation bodies or certification bodies, there is a requirement for certification bodies to have a procedure for this notification and guidance on how this should take place (timeframe, manner, channel, etc.).</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> - contracts/agreements with accreditation bodies and certification bodies regarding notification of changes, internal procedure/quality handbook for change management, ring information flow.
Conclusion	References
<p>The RFM Program is in alignment because the QMS Clause 3.3.2 states;</p> <p>CSC 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.</p> <p>Communication was sent to both ABs (INAB and ANAB) outlining the changes that have been made to the RFM standards and where to find this information. Examples include change of ownership.</p> <p>The information is freely available on the RFM website. CBs will also be informed of these changes.</p>	<ul style="list-style-type: none"> • Change of ownership • Letter to ANAB confirming changes in ownership, as an example of change management • Quality Management System • Section 3.3.2 • https://rfmcertification.org/wp-content/uploads/2022/08/QMS-Chapters-1-7_Final.pdf

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B.2.16 Corrective Action

GSSI Component	Guidance	
<p>The Scheme Owner clearly defines the criteria relating to the classification of non-conformities. Where the Scheme Owner allows for certification of an entity with non-compliances, the Scheme Owner requires that:</p> <ul style="list-style-type: none"> - only non-conformities on minor, non-critical issues are allowed; - a timeline for closing out corrective actions must be defined; - a system to verify that corrective actions have been closed out is in place. 	<p>The Scheme Owner defines the criteria related to rating the severity of non-conformities for certification bodies. If Scheme allows for certified entities with non-compliances, these can only be (All must be met): minor/non-critical, with a defined timeline for closing out and a mechanism defined to verify resolution.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> - contract/agreement between the Scheme Owner and the certification body, certification requirements/methodologies specifying classifications of non-conformities and conditions for allowing certification with non-compliances. - guidance specifying procedures and process for classifying nonconformities and conditions for issuing certification, audit reports. 	
Conclusion		References
<p>The RFM Program is in alignment because the process and rules regarding the certification of entities with non-compliances is defined in RFM QMS</p> <p>Section 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.</p> <p>Section 4.1.4: A fishery or supply chain organization may be certified only if any non-conformances are minor and pertain to non-critical issues. For any certification of a fishery or supply chain organization with non-conformances, Certification Bodies must specify: A timeline for closing out corrective actions at annual surveillance; and A system to verify that corrective actions have been satisfied.</p>		<ul style="list-style-type: none"> • Crab fishery report - 2022 <ul style="list-style-type: none"> • Section 10 • https://rfmcertification.org/wp-content/uploads/2022/03/AK-RFM-BSAI-Crab-Form-9d-RFM-CSC-2nd-reassessment-Certification-Report-3_12_2022-002.pdf • halibut fishery report - 2017 <ul style="list-style-type: none"> • pg 263 • https://rfmcertification.org/wp-content/uploads/2021/06/Alaska-

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B.2.16 Corrective Action

Procedure 2, Section 3.1.5 (for fisheries) provides levels of clause scoring

Section 3.17 provides the procedure for corrective actions

The Certification Body shall send a letter of notification to the applicant detailing any non-conformances identified during the assessment. The applicant has 28 working days after receipt of the notice to submit to the CB evidence and/or corrective action plans to address the non-conformance. The evidence shall be submitted to the Certification Body Lead Assessor for review for either acceptance, rejection or further clarification. The Certification Body Lead Assessor's conclusion shall be reviewed by the Assessment Team. If the Assessment Team does not reach consensus concerning the need for and scope of corrective actions, a majority of the Assessment Team shall define correction actions.

Procedure 4, Section 7.2 (for CoC). Provide clarification on non-conformities

Section 11 provides details for non-conformance follow up (CoC)

In accordance with requirements in the Certification Body's certification system, the applicant must notify the Certification Body, detailing the specific actions that have been taken to correct the critical, major and minor non-conformances that were identified during assessment. Depending on the nature of the non-conformance, the applicant will either supply documentary evidence to the Certification Body or schedule a re-assessment. All non-conformances must be addressed prior to awarding certification.

After fifteen (15) calendar days from the date of the assessment, the Certification Body shall evaluate the Applicant's progress in completing the corrective actions and confer with the Applicant concerning that progress and any actions needed for issuance of a certificate. All non-conformances must be addressed within twenty-eight calendar days of the issuance of the final Assessment Report, unless an applicant's request for extension has been submitted and approved.

RFM-Final-Full-Assessment-Halibut-Report-Jan-2017-final.pdf

- Halibut fishery report - 2019
 - pg 95
 - https://rfmcertification.org/wp-content/uploads/2021/06/Form-9g-AKRFM-Halibut-3rd-Surveillance-Report-9_19_2019.pdf
- Halibut fishery report - 2021
 - pg 73
 - https://rfmcertification.org/wp-content/uploads/2021/07/Form-9g-AK-RFM-Pacific-Halibut-surveillance-4-report_FINAL.pdf
- QMS, RFM Certification Program, Version 5.1
 - Section 4.14, 4.1.10
 - https://rfmcertification.org/wp-content/uploads/2022/11/QMS-V5.1-Nov-2022_2.pdf
- RFM Procedure 2, Version 6.1: Application to Certification Procedures for the RFM Fishery Standard,
 - Sections 3.1.5, 3.1.7

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B.2.16 Corrective Action

Any onsite verification of the corrective actions taken in response to critical and major non-conformances will be scheduled during the time when the relevant product is being manufactured.

RFM is compliant as the additional evidence shows a series of fishery reports including NCs, action plans and subsequent closing of any NCs.

Halibut reports show an NC being brought forward and then resolved. In 2017 the report identified NC's and an Action Plan was constructed. 2019 one NC was resolved with the second and last NC being cleared in 2021.

Crab had NC's which were resolved in the same year.

Salmon which has not had all (NC's) been closed off due to the duration of the agreed Action Plan. Salmon had NC's ID'd in 2016/17 and have been part of each assessment with significant progress to closing out the NC's. The 2021 has a summary."

- https://rfmcertification.org/wp-content/uploads/2022/11/Procedure-2-CSC_Final-Nov-2022.pdf
- RFM Procedure 4 Version 5.1: Application to Certification Procedures for the RFM Unified Chain of Custody Standard,
 - Sections 7.2, 11
 - https://rfmcertification.org/wp-content/uploads/2022/11/Procedure-4-CSC_Final-Nov-2022.pdf
- Salmon fishery report -
 - pg 298
 - https://rfmcertification.org/wp-content/uploads/2021/06/AK_SAL-Alaska-salmon-2nd-Reassessment-Report-Final-1

B.2.17 Auditor Competence

GSSI Component	Guidance
The Scheme Owner has defined the qualifications and competence criteria required by auditors and audit teams, employed by certification bodies, and it	<p>The Scheme Owner defines the requirement for certification body auditor and audit teams qualifications and competency and these requirements are publicly available. Competencies and qualifications include knowledge in the standard, education, experience and personal attributes.</p> <p>Examples of evidence for scheme alignment:</p>

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B.2.17 Auditor Competence

makes this information publicly available.

- contract/agreement between the Scheme Owner and the accreditation body/certification body, accreditation/certification requirements/methodologies specifying criteria for each function,
- auditor assessment and training records,
- auditor CVs.

Conclusion

The RFM Program is in alignment because Procedure 8 sets out the procedures for appointment and approval of RFM Fishery Assessors and Chain of Custody Auditors to ensure that they have the competency to carry out assessments required for the RFM Program.

This procedure applies to all personnel authorized to conduct assessments/audits under the RFM Fishery Standard or the RFM Chain of Custody Standard.

Only Assessors selected, appointed and controlled by approved Certification Bodies may carry out assessment activities.

Aor additional clarification

For additional clarification, annual audits of CBs include reviewing of auditors; competency, training records, qualifications, ongoing development.

Two audit reports are provided to show that these are checked. For remote audits records are shown online. This includes following the details for 1-2 auditors to demonstrate they have all the requirements for the program.

Each CB has a set of training information. The attached evidence provides examples NSF procedures, Appendices 9 and 10 provide details for fisheries training and ongoing development

References

- CB annual checks and auditor qualifications and competence
- CB reports x 2; one each for NSF-GT and SCS
- RFM Procedure 8 Version 5.1: Appointment and Control of RFM Assessors,
 - Section 5
 - https://rfmcertification.org/wp-content/uploads/2022/11/Procedure-8-V5.1-November-2022_2.pdf

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B.2.17 Auditor Competence

DNV procedures, Sections 5 and 7.3 refer to personnel, resource availability. These cross reference to training requirements and procedures (viewed during the annual audit).

B.2.18 Auditor Competence

GSSI Component	Guidance
The Scheme Owner requires certification body auditors to have successfully completed training in the scheme to the satisfaction of the Scheme Owner.	<p>The Scheme Owner defines the requirement for certification body auditor training in the standard including initial and ongoing development.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> - contract/agreement between the Scheme Owner and the accreditation body/certification body, accreditation/certification requirements/methodologies specifying criteria for each function. - auditor assessment and training records.
Conclusion	References
<p>The RFM Program is in alignment because 4.2.1 of the QMS states Certification Body Assessors/Auditors are required to have successfully completed training in the RFM Program.</p> <p>4.2.2 provides further details for fishery assessors</p> <p>All Fishery Assessors will undergo a period of supervised training on the RFM Program as set out in Procedure 8, which shall be documented by the attestation of the satisfactory completion of the training program by the appointed competent supervisor.</p> <p>Procedure 8, section 6.1 for CoC states</p> <p>Certification Bodies must demonstrate that appropriate training for each auditor and sub-contracted auditor has been undertaken to understand the RFM CoC Standard.</p>	<ul style="list-style-type: none"> • CB annual checks and auditor qualifications and competence • CB reports x 2; one each for NSF-GT and SCS • QMS, RFM Certification Program, Version 5.1, Nov • Section 4.2.1 • https://rfmcertification.org/wp-content/uploads/2022/11/QMS-V5.1-Nov-2022_2.pdf

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B.2.18 Auditor Competence

For additional clarification, annual audits of CBs include reviewing of auditors; competency, training records, qualifications, ongoing development.

Two audit reports are provided to show that these are checked. For remote audits records are shown online. This includes following the details for 1-2 auditors to demonstrate they have all the requirements for the program.

Each CB has a set of training information. The attached evidence provides examples NSF procedures, Appendices 9 and 10 provide details for fisheries training and ongoing development

DNV procedures, Sections 5 and 7.3 refer to personnel, resource availability. These cross reference to training requirements and procedures (viewed during the annual audit).

- RFM Procedure 8 Version 5.1: Appointment and Control of RFM Assessors,
- https://rfmcertification.org/wp-content/uploads/2022/11/Procedure-8-V5.1-November-2022_2.pdf

B.2.19 Auditor Competence

GSSI Component	Guidance
The Scheme Owner requires that certification body auditors successfully complete auditor training based on ISO 19011. This does not include technical experts	<p>The Scheme Owner defines the requirement for certification body auditors to have successfully completed (passed) training based on ISO 19011 Guidelines for auditing management systems) and that the audit team includes at least one auditor. Technical experts can supplement auditor expertise but are not formally auditors and do not count as an auditor.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> - contract/agreement between the Scheme Owner and the accreditation body/certification body, accreditation/certification requirements/methodologies specifying criteria for each function. - auditor assessment and training records. - auditor CVs. - audit Reports.

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B.2.19 Auditor Competence

seconded to audit teams.

Conclusion

The RFM Program is in alignment because the completion of auditor training based on ISO 19011 is a requirement for assessors.

Procedure 8 states: 5.2.1 a) For Lead Assessors only, successful completion of a Lead Assessor training course based on ISO 19011 principles that must have a minimum duration of 37 hours and must be externally recognized by the industry. The certificate must specify the course content and duration. Successful completion must be indicated on the certificate.

For additional clarification, annual audits of CBs include reviewing of auditors; competency, training records, qualifications, ongoing development.

Two audit reports are provided to show that these are checked. For remote audits records are shown online. This includes following the details for 1-2 auditors to demonstrate they have all the requirements for the program.

Each CB has a set of training information. The attached evidence provides examples NSF procedures, Appendices 9 and 10 provide details for fisheries training and ongoing development

DNV procedures, Sections 5 and 7.3 refer to personnel, resource availability. These cross reference to training requirements and procedures (viewed during the annual audit).

References

- CB annual checks and auditor qualifications and competence
- CB reports x 2; one each for NSF-GT and SCS
- RFM Procedure 8 Version 5.1: Appointment and Control of RFM Assessors,
- https://rfmcertification.org/wp-content/uploads/2022/11/Procedure-8-V5.1-November-2022_2.pdf

B . 2 C E R T I F I C A T I O N

B.2.20 Auditor Competence		
GSSI Component	Guidance	
<p>The Scheme Owner requires that certification bodies include the following in their competence assessment of auditors:</p> <ul style="list-style-type: none"> - an assessment of knowledge and skills for each fundamental area the auditor will be expected to be working, - an assessment of knowledge of pertinent fishery and /or aquaculture Programs and the ability to access and be able to apply relevant laws and regulations, - an assessment of the personal attributes of the auditor, to ensure they conduct themselves in a professional manner, - a period of supervision to cover the assessment fishery and/or aquaculture principles, specific audit techniques and specific category knowledge, - a documented sign off by the certification body of the satisfactory completion of assessment requirements. 	<p>The Scheme Owner defines the requirement for certification bodies to include all of the elements in the Essential Component in the management of personnel competence (ISO 17065 clause 6.1.2).</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> - contract/agreement between the Scheme Owner and the certification body, accreditation/certification requirements/ methodologies specifying requirement, - guidance outlining the system and criteria for competencies, training, etc. (see B.2.17- B2.19, 21-22), - auditor assessment and training records, - auditor CVs, - accreditation body reports. 	
Conclusion	References	
<p>The RFM Program is in alignment because Procedure 8 details the qualifications in Sections 5 (fishery) and 6 (CoC).</p> <p>Section 3.1 provides details of the competence assessment including:</p> <p>Assessor/Auditor competence will be determined through interview and professional experience review; such reviews will be documented and approved.</p> <p>Where applicable, this may be followed by a series of witnessed assessments (i.e. shadow audits at least 1 plus a sign off witness assessment) to verify Assessor / Auditor competence.</p>	<ul style="list-style-type: none"> • CB annual checks and auditor qualifications and competence • CB reports x 2; one each for NSF-GT and SCS • Quality Management System <ul style="list-style-type: none"> • Section 4.2.2 • https://rfmcertification.org/wp-content/uploads/2022/08/QMS-Chapters-1-7_Final.pdf 	

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B.2.20 Auditor Competence

Experienced Assessors/Auditors may demonstrate competence within a specific Program through interview and/or evidence of having completed an appropriate number of assessments/ audits against the standard in question.

The QMS, section 4.2.2. details that

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

An assessment of knowledge and skills for each fundamental area of each assessor's expected work;

An assessment of knowledge of the pertinent fishery and the ability to assess compliance with relevant laws and regulations;

An assessment of knowledge of pertinent supply chain traceability and verification systems

An assessment of each assessor's ability to perform all necessary aspects of the complete the assessment

For additional clarification, annual audits of CBs include reviewing of auditors; competency, training records, qualifications, ongoing development.

Two audit reports are provided to show that these are checked. For remote audits records are shown online. This includes following the details for 1-2 auditors to demonstrate they have all the requirements for the program.

Each CB has a set of training information. The attached evidence provides examples

NSF procedures, Appendices 9 and 10 provide details for fisheries training and ongoing development

DNV procedures, Sections 5 and 7.3 refer to personnel, resource availability. These cross reference to training requirements and procedures (viewed during the annual audit).

- RFM Procedure 8 Version 5.1: Appointment and Control of RFM Assessors,
- Sections 3.1, 5, 6
- https://rfmcertification.org/wp-content/uploads/2022/11/Procedure-8-V5.1-November-2022_2.pdf

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B.2.21 Auditor Competence		
GSSI Component	Guidance	
The Scheme Owner requires that certification body lead auditors maintain category and scheme knowledge.	<p>The Scheme Owner defines the requirement for certification body lead auditors to have and maintain the necessary training, technical knowledge and experience to ensure consistent and accurate audits.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> - contract/agreement between the Scheme Owner and the certification body, accreditation/certification requirements/ methodologies specifying requirement, - guidance outlining the system and criteria for lead auditors, - lead auditor assessment and training records, - lead auditor CVs, - accreditation body reports. 	
Conclusion		References
<p>The Program is in alignment because</p> <p>Procedure 8, Section 3.1 states</p> <p>An Assessor/Auditor that has not performed an assessment or audit for a period of more than 24 months must reapply for approval as an RFM Assessor/Auditor.</p> <p>For additional clarification, annual audits of CBs include reviewing of auditors; competency, training records, qualifications, ongoing development.</p> <p>Two audit reports are provided to show that these are checked. For remote audits records are shown online. This includes following the details for 1-2 auditors to demonstrate they have all the requirements for the program.</p> <p>Each CB has a set of training information. The attached evidence provides examples</p> <p>NSF procedures, Appendices 9 and 10 provide details for fisheries training and ongoing development</p>		<ul style="list-style-type: none"> • CB annual checks and auditor qualifications and competence • CB reports x 2; one each for NSF-GT and SCS • RFM Procedure 8 Version 5.1: Appointment and Control of RFM Assessors, • Section 3.1 • https://rfmcertification.org/wp-content/uploads/2022/11/Procedure-8-V5.1-November-2022_2.pdf

B . 2 C E R T I F I C A T I O N

B.2.21 Auditor Competence

DNV procedures, Sections 5 and 7.3 refer to personnel, resource availability. These cross reference to training requirements and procedures (viewed during the annual audit).

B.2.22 Auditor Competence

GSSI Component	Guidance	
The Scheme Owner requires that certification bodies have a continuing professional development program in place that provides auditors with current best practice for fishery and/or aquaculture.	<p>The Scheme Owner defines the requirement for certification body auditor ongoing professional development to maintain current best practice in sector.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> - contract/agreement between the Scheme Owner and the accreditation body/certification body, accreditation/certification requirements/methodologies specifying criteria for continuous professional development, - auditor training, assessment and training records. 	
Conclusion		References
<p>The RFM Program is in alignment because the Appointment and Control of RFM Assessors contains the following</p> <p>3.2 b) The Certification Body shall ensure that approved RFM Assessors/Auditors are afforded reasonable opportunity for ongoing professional development relating to best practice in the relevant sector (fishery or CoC). Records of professional development shall be maintained.</p> <p>Continuous professional development is managed through update training, annual review and witnessed assessments. The contract with the CB states that they must be accredited to ISO 17065 with the RFM scheme in the scope.</p> <p>This ensures that all the procedures are met. Independent review by CSC also verifies this.</p>		<ul style="list-style-type: none"> • CB annual checks and auditor qualifications and competence • CB reports x 2; one each for NSF-GT and SCS • RFM Procedure 8 Version 5.1: Appointment and Control of RFM Assessors, <ul style="list-style-type: none"> • Section 3.2 • https://rfmcertification.org/wp-content/uploads/2022/11/Procedure-8-V5.1-November-2022_2.pdf

B . 2 C E R T I F I C A T I O N

B.2.22 Auditor Competence

For additional clarification, annual audits of CBs include reviewing of auditors; competency, training records, qualifications, ongoing development.

Two audit reports are provided to show that these are checked. For remote audits records are shown online. This includes following the details for 1-2 auditors to demonstrate they have all the requirements for the program.

Each CB has a set of training information. The attached evidence provides examples NSF procedures, Appendices 9 and 10 provide details for fisheries training and ongoing development

DNV procedures, Sections 5 and 7.3 refer to personnel, resource availability. These cross reference to training requirements and procedures (viewed during the annual audit).

B.3 CHAIN OF CUSTODY

B.3.01 Segregation		
GSSI Component	Guidance	
The Scheme Owner requires that all certified products are identified and segregated from non-certified products at all stages of the supply chain.	<p>The Scheme Owner requires clear identification and separation of certified from non-certified product at all stages of the supply chain.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> - Chain of Custody standards, audit checklists, certification requirements/methodologies specifying requirement. - Chain of Custody audit reports. 	
Conclusion	References	
<p>The RFM Program is in alignment because the CoC standard includes the following relevant clauses:</p> <p>Clause 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."</p> <p>Clause 1.6: The company shall have a system in place to ensure that purchased seafood carrying the RFM certification mark is not mixed with non-certified seafood during transportation to and from the site and in third party storage if applicable.</p> <p>1.7: Where the Applicant utilizes the services of a subcontractor (carrying out contract processing, packaging, or labelling activities), the Subcontractor shall be certified to the RFM Chain of Custody Standard.</p>	<ul style="list-style-type: none"> • Unified Responsible Fisheries Management (RFM) Chain of Custody Standard V2.5 • 1.3, 1.6, 1.7 • https://rfmcertification.org/wp-content/uploads/2022/02/Unified-RFM-CoC-V2.5_Final_Website-Posting.pdf 	

B . 3 C H A I N O F C U S T O D Y

B.3.02 Entities To Be Audited

GSSI Component	Guidance	
<p>The Scheme Owner requires all entities that are physically handling the certified product to undergo a Chain of Custody audit by an accredited certification body if the product can be destined for retail sale as a certified, labelled product.</p> <p>Exceptions: No audit is required for storage and distribution of tamper-proof, packaged products.</p>	<p>The Scheme Owner requires all entities in a supply chain that physically handle the product and where there is the possibility of mixing undergo a Chain of Custody audit if the product will be claimed as certified or carry a label. Entities in the supply chain which do not take physical control or only handle storage and distribution in tamper proof packaging need to be identified, but do not require a Chain of Custody audit.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> - contract/agreement between the Scheme Owner and the accreditation body/certification body, certified entity, certification requirements/methodologies defining types of operations and activities that require auditing according to these requirements, - Chain of Custody reports. 	
Conclusion		References
<p>The RFM Program is in alignment because the CoC standard includes the following relevant clauses:</p> <p>1.7: Where the Applicant utilizes the services of a subcontractor (carrying out contract processing, packaging, or labelling activities), the Subcontractor shall be certified to the RFM Chain of Custody Standard.</p> <p>1.8: Where the Applicant utilizes 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.</p> <p>5.8: Where a Multi-site Organization utilizes the services of a subcontractor (carrying out contract processing, packing or labelling activities), the subcontractor shall be certified to the RFM Chain of Custody Standard.</p> <p>5.9: Where a Multi-site Organization utilizes the services of third-party service provider, a signed contract or equivalent documentary evidence shall be in place demonstrating that product traceability and tamper proofing is ensured during storage, distribution or transportation.</p>		<ul style="list-style-type: none"> • Unified Responsible Fisheries Management (RFM) Chain of Custody Standard V2.5 • Section titled Scope • 1.7, 1.8, 5.8, 5.9 • https://rfmcertification.org/wp-content/uploads/2022/02/Unified-RFM-CoC-V2.5_Final_Website-Posting.pdf

B . 3 C H A I N O F C U S T O D Y

B.3.02 Entities To Be Audited

CoC certification is a requirement for each organization in the supply chain taking legal ownership of certified RFM products that wish to make a claim on the certified source, up until the point where products are packed into consumer ready packaging

B.3.03 Records for Traceability

GSSI Component	Guidance	
The Scheme Owner requires certification bodies to verify that all entities within the chain maintain accurate and accessible records that allow any certified product or batch of products to be traceable from the point of sale to the buyer.	<p>The Scheme Owner defines the requirement for certification bodies that all entities within the supply chain, including those which may not undergo a Chain of Custody audit (see B.3.02), maintain up to date, complete and accessible records that allow for full traceability of the product along the entire supply chain.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> - Chain of Custody standard. - contract/agreement between the Scheme Owner and the certification body, accreditation/certification requirements/ methodologies specifying criteria for document control and maintenance. - auditor checklists. 	
Conclusion		References
<p>The RFM Program is in alignment because the CoC standard includes the following relevant clauses:</p> <p>Clause 1.4: The Applicant shall have a traceability system that can identify the certified seafood products enable tracking from receipt, during intake, processing, storage, dispatch handling and delivery to customer.</p> <p>1.8: Where the Applicant utilizes 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.</p>		<ul style="list-style-type: none"> • Unified Responsible Fisheries Management (RFM) Chain of Custody Standard V2.5 • Clauses 1.4, 1.8, 2.4, 3.2 • https://cdn.rfmcertification.org/wp-content/uploads/2022/02/Unified-RFM-CoC-V2.5_Final_Website-Posting.pdf

B . 3 C H A I N O F C U S T O D Y

B.3.03 Records for Traceability

Clause 2.4: The Applicant 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.

Clause 3.2: Documentation must be available that verifies the identity of the certified seafood as originating from an RFM certified fishery.

B.3.04 Sub-contractors

GSSI Component	Guidance	
The Scheme Owner requires that entities are able to demonstrate that these Chain of Custody requirements are met by the enterprise's subcontractors.	<p>The Scheme Owner ensures that certified entity takes full responsibility that all subcontractors fully meet Chain of Custody requirements and has a system to demonstrate this.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> - sub-contract agreements, internal audits. If the Scheme Owner does not allow sub-contracting then this is aligned (as opposed to Not Applicable) 	
Conclusion		References
<p>The RFM Program is in alignment because the CoC standard includes the following relevant clauses:</p> <p>1.7: Where the Applicant utilizes the services of a subcontractor (carrying out contract processing, packaging, or labelling activities), the Subcontractor shall be certified to the RFM Chain of Custody Standard.</p> <p>In the additional evidence provided, there is one company (BS) that uses 3 subcontractors. Each company has separate CoC certification.</p>		<ul style="list-style-type: none"> • CoC reports x 4 • Unified Responsible Fisheries Management (RFM) Chain of Custody Standard V2.5 • Section 1.7 • https://cdn.rfmcertification.org/wp-content/uploads/2022/02/Unified-RFM-CoC-V2.5_Final_Website-Posting.pdf

B . 3 C H A I N O F C U S T O D Y

B.3.05 Auditing Methods and Frequency

GSSI Component	Guidance
<p>The Scheme Owner has or requires certification bodies to have documented procedures for auditing methods and frequency of audits that meet the following requirements:</p> <ul style="list-style-type: none"> - certificate validity does not exceed 3 years; - periodicity depends on risk factors - changes to an entity's traceability system that are deemed to affect the integrity of the Chain of Custody result in a re-audit (onsite). 	<p>The Scheme Owner has or ensures certification bodies have documented Chain of Custody audit methodologies including: validity of certificate cannot exceed 3 years, frequency of audits takes into consideration risk factors and an onsite audit is required when substantive changes to the certified entities traceability system take place. These are instances where the integrity of the Chain of Custody could be affected such as company mergers, major new markets.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> - requirements in the contract/agreement between the Scheme Owner and the certification body, in a separate accreditation manual or for example in certification requirements/methodologies. - guidance interpretation specifying frequency, auditing methods and risk factors, in order to support consistency between certification bodies.
Conclusion	References
<p>The RFM Program is in alignment because the QMS states;</p> <p>3.3.4 : Certification Bodies shall document procedures for methods and frequency of audits that meet the following requirements:</p> <p>Chain of Custody Certificate validity does not exceed three years;</p> <p>Periodicity of recertification and audits shall be prescribed based on risk factors;</p> <p>To maintain certification a Chain of Custody Certificate holder shall be subjected to surveillance audits to maintain their certification status and</p> <p>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.</p> <p>The CoC auditing regime is defined in Procedure 4.</p> <p>Section 4</p>	<ul style="list-style-type: none"> • Procedure 4: Application to Certification Procedures for the RFM Chain of Custody Standard • Section 4, 9, 9.1 • https://rfmcertification.org/wp-content/uploads/2022/08/Procedure-4-CSC_Final.pdf • QMS • Section 4.3.4 • https://rfmcertification.org/wp-content/uploads/2022/08/QMS-Chapters-1-7_Final.pdf

B . 3 C H A I N O F C U S T O D Y

B.3.05 Auditing Methods and Frequency

Audits: Within a 12-month time period from the Pre-assessment, an audit must be conducted at the applicant's site. The Certification Body must report any failure to meet this 12-month requirement to CSC Program Manager stating the reasons for such failure.

Section 9 – Annual Surveillance Audit Scheduling

Surveillance audits (except for traders) are scheduled within 4 months of the end of the 12-month intervals following the initial audit, with no audits occurring within 6 months of the previous audit. Surveillance audits for traders are scheduled within 4 months of the end of 18-month intervals from the initial audit and is conducted by the certification body using an approved remote assessment methodology, based on documentation submitted by the trader for review.

In all cases, the Certification Body ultimately reserves the right to determine Surveillance Audit frequency based upon the inherent product/process risk as well as the results of an Applicant's prior assessments and audits.

Audits may be undertaken on short notice (i.e. unscheduled audits), if deemed necessary by the Certification Body.

9.1 Re-certification Audit Scheduling

The approved applicant must apply for the re-certification audit at least two months before the current certificate is due to expire, in order to allow sufficient time to complete the Audit and recertification prior to that expiration. The scope of the re-certification audit shall include, when necessary, a site visit or site visits, as appropriate.

- Unified Responsible Fisheries Management (RFM) Chain of Custody Standard
- Clauses 9, 9.1
- https://cdn.rfmcertification.org/wp-content/uploads/2022/02/Unified-RFM-CoC-V2.5_Final_Website-Posting.pdf

B . 3 C H A I N O F C U S T O D Y

B.3.06 Non-conformity / Corrective Actions

GSSI Component	Guidance
<p>The Scheme Owner requires the certification body to record all identified breaches of the chain of custody, including:</p> <ul style="list-style-type: none"> - an explanation of the factors that allowed the breach to occur; - an explanation of the corrective actions required to ensure that a similar breach does not re-occur; - the time frames for the corrective actions to be completed; and - the date of closing out of the corrective actions and how the problem was solved. 	<p>The Scheme Owner requires of certification bodies to document all breaches of Chain of Custody with explanation of contextual factors, corrective actions, and timeframes for corrective actions, date of closing and resolution.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> - certification requirements/methodologies defining requirements of reports, contract or agreement specifying requirements, mandatory template reports. - Chain of Custody audit report.
Conclusion	References
<p>The RFM Program is in alignment because the system by which CoC breaches are dealt with are detailed in QMS, Section 4.3.5</p> <p>Certification Bodies shall record all identified breaches of the chain of custody, e.g. a certified Chain of Custody holder has evoked their product recall system for certified RFM products, including:</p> <p>An explanation of the factors that allowed the breach to occur;</p> <p>An explanation of the corrective actions required to ensure that a similar breach does not re-occur;</p> <p>The time frames for the corrective actions to be completed; and</p> <p>On completion of corrective actions, the date of closing out of those corrective actions and the means by which problems were solved.</p> <p>Throughout the assessment, the assessor makes detailed notes of the applicant's compliance to the RFM COC Standard. These notes are used to generate the Final Assessment Report. If the applicant cannot meet a clause in one of the Standards, the assessor determines the nature and significance of the non-conformance against the Standard and enters this information in the report.</p>	<ul style="list-style-type: none"> • CoC audit reports x 4 <ul style="list-style-type: none"> • 3 x single site, 1 x multi site • QMS, RFM Certification Program, Version 5.1, <ul style="list-style-type: none"> • Section 4.3.5 • https://rfmcertification.org/wp-content/uploads/2022/11/QMS-V5.1-Nov-2022_2.pdf • RFM Procedure 4 Version 5.1: Application to Certification Procedures for the RFM Unified Chain of Custody Standard, <ul style="list-style-type: none"> • Sections 10, 11

B . 3 C H A I N O F C U S T O D Y

B.3.06 Non-conformity / Corrective Actions

Procedure 4, Sections 10 and 11 also cover requirements for non-conformance, corrective actions

Section 10 – Issuance of assessment reports

Written assessment report issued in the approved format will be sent to the applicant following an assessment. The report will contain a general summary, a performance overview, a summary of non-conformances and the subsequent corrective actions taken, and comprehensive details demonstrating the applicant's compliance with the RFM CoC Standard, including evidence that the applicant, if a primary processor, has met the cost sharing requirements of the client. Evidence may include a list held by either the Client or by the Standards Owner on a designated webpage

Section 11 – Non-conformance Follow-up

In accordance with requirements in the Certification Body's certification system, the applicant must notify the Certification Body, detailing the specific actions that have been taken to correct the critical, major and minor non-conformances that were identified during assessment. Depending on the nature of the non-conformance, the applicant will either supply documentary evidence to the Certification Body or schedule a re-assessment. All non-conformances must be addressed prior to awarding certification.

After fifteen (15) calendar days from the date of the assessment, the Certification Body shall evaluate the Applicant's progress in completing the corrective actions and confer with the Applicant concerning that progress and any actions needed for issuance of a certificate. All non-conformances must be addressed within twenty-eight calendar days of the issuance of the final Assessment Report, unless an applicant's request for extension has been submitted and approved. Any onsite verification of the corrective actions taken in response to critical and major non-conformances will be scheduled during the time when the relevant product is being manufactured.

Additional information/evidence is provided in the form of a audit reports. Three multi-site reports are provided and one single site report.

- https://rfmcertification.org/wp-content/uploads/2022/11/Procedure-4-CSC_Final-Nov-2022.pdf

B . 3 C H A I N O F C U S T O D Y

B.3.07 Audit Reports

GSSI Component	Guidance
<p>The Scheme Owner requires that certification body audit reports include:</p> <ul style="list-style-type: none"> - the date of the inspection/audit; - the name(s) of the person(s) responsible for the audit and report; - the names and addresses of the sites inspected/audited; - the scope of the inspection/audit; - the non-conformities identified; - the result of at least one mass balance assessment for each product covered by the Chain of Custody audit; and - a conclusion on the conformity of the client with the Chain of Custody requirements. 	<p>The Scheme Owner requires of certification bodies that all Chain of Custody audit reports include all of the elements in the Essential Component.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> - certification requirements/methodologies defining requirements of reports, mandatory template reports. - Chain of Custody audit report.
Conclusion	References
<p>The RFM Program is in alignment because the required contents of Audit Reports are listed in RFM QMS 4.3.6: A Certification Body's Assessment and Audit reports shall include:</p> <ul style="list-style-type: none"> - The date of the inspection/audit; - The names of all persons responsible for the audit and report; - The names and addresses of the sites inspected/audited; - The scope of the inspection/audit (include fisheries, sites etc); - Any non-conformities identified; - The results of at least one mass balance assessment for each product covered by the agreed certified fishery scope of the Chain of Custody audit; and - A conclusion on the conformity of the Client with the Chain of Custody requirements. <p>Additional information/evidence is provided in the form of a audit reports. Three multi-site reports are provided and one single site report.</p>	<ul style="list-style-type: none"> • CoC audit reports x4 <ul style="list-style-type: none"> • 3 x single site, 1 x multi site • QMS, RFM Certification Program, Version 5.1 <ul style="list-style-type: none"> • Section 4.3.6 • https://rfmcertification.org/wp-content/uploads/2022/11/QMS-V5.1-Nov-2022_2.pdf

B . 3 C H A I N O F C U S T O D Y

B.3.08 Audit Reports

GSSI Component	Guidance	
The Scheme Owner requires certification bodies to file reports at their office and to make these reports available to relevant parties upon request.	<p>Certification bodies are required to maintain files of Chain of Custody audit reports (paper or electronic) and make these available upon request to relevant parties, within contractual arrangements with certified entities.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> - contracts, agreements, certification requirements specify Chain of Custody reports are filed and process for making them available. 	
Conclusion	References	
<p>The RFM Program is in alignment. CBs retain copies at their offices.</p> <p>CSC can make CoC available only if the Applicant / Client provides permission that the report can be shared with a third party (in line with ISO 17065 requirements)</p> <p>Tested via the CB annual review, annual reviews have been carried out on both CBs. These have a consistent approach in line with ISO 17065 requirements. The reviewers are the same for both CBs.</p> <p>CoC reports were accessed during this review and a list of certificates issued is in the minutes for each review.</p>	<ul style="list-style-type: none"> • Annual review of CB – SCS • CB Annual review – NSF GTC 	

B . 3 C H A I N O F C U S T O D Y

B.3.09 Record Keeping

GSSI Component	Guidance	
<p>The Scheme Owner requires that an enterprise certified entity keeps records that demonstrate conformity with the Chain of Custody requirements for a period that:</p> <ul style="list-style-type: none"> - exceeds the shelf life of the certified product; and - exceeds the periodicity between audits 	<p>Certified entity must keep records documenting compliance with Chain of Custody standard requirements at a minimum time that is longer than a. the shelf life of the product and b. time between audits.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> - Chain of Custody standard, guidance interpretation and audit checklist that specify document retention policy. 	
Conclusion		References
<p>The RFM Program is in alignment because Clause 3.9 of the CoC standard states the requirement of: Traceability records shall be kept for a reasonable period to correspond with the shelf life of the product and/or a minimum of three years. Traceability records shall be accurate, legible and unadulterated.</p> <p>Additional information/evidence is provided in the form of a surveillance report. Two examples are provided demonstrating surveillance audits undertaken.</p>		<ul style="list-style-type: none"> • CoC - x2 surveillance reports • Unified Responsible Fisheries Management (RFM) Chain of Custody Standard v2.5 • Clause 3.9 • https://cdn.rfmcertification.org/wp-content/uploads/2022/02/Unified-RFM-CoC-V2.5_Final_Website-Posting.pdf

B . 3 C H A I N O F C U S T O D Y

B.3.10 Multi-site CoC

GSSI Component	Guidance
Where a scheme allows for Chain of Custody certification of multiple sites managed under the control of a single entity, the Scheme Owner defines specific audit procedures that ensure all sites comply with the Chain of Custody certification requirements. Control can include direct ownership, franchises, or where the entity has a signed agreement or contract with each site.	<p>If the Scheme Owner does not allow Chain of Custody of multi-sites (prohibits not that it is not yet developed or exists)- requirement is “Not applicable”. Otherwise, the Scheme Owner defines audit procedure for multi-sites (under control of one entity) and requirements for internal control management system.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> - Chain of Custody standard, guidance or checklist specifying procedure and internal control system.
Conclusion	References
<p>The RFM Program is in alignment because specific requirements which must be met by multi-site applicants are defined in the CoC standard in Sections 6, 7 and 8. These 3 sections are prefaced by the statement;</p> <p>Additional Multi – site Chain of Custody Standard Requirements</p> <p>This section details the set of requirements that shall be certified as being in place where the Applicant is a Multi-site Organization; these requirements apply to the designated central office.</p> <p>A Multi-site Organization may be considered as such only if it complies with the following criteria. All sites within the organization:</p> <ul style="list-style-type: none"> • shall have a legal or contractual link with a central office of the named and designated coordinating organization. • Shall perform operations and related activities; • 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 coordinating organization. 	<ul style="list-style-type: none"> • Unified Responsible Fisheries Management (RFM) Chain of Custody Standard v2.5 • Sections 6, 7, 8 • https://cdn.rfmcertification.org/wp-content/uploads/2022/02/Unified-RFM-CoC-V2.5_Final_Website-Posting.pdf

B . 3 C H A I N O F C U S T O D Y

B.3.11 Multi-site CoC

GSSI Component	Guidance	
Where the Scheme Owner allows for multisite certification, they require that all sites are assessed as part of the internal audit during the period of validity of the certificate.	<p>The Scheme Owner does not allow Chain of Custody of multi-siterequirement is “Not applicable”. Otherwise, the Chain of custody standard requires all sites are assessed as part of the internal audit during the validity period of the certificate.</p> <p>Examples of evidence for scheme alignment:</p> <ul style="list-style-type: none"> - standard, guidance interpretation and audit checklist. 	
Conclusion		References
<p>The RFM Program is in alignment because there are</p> <p>The full details of Audit Plan for multi-site Organizations can be found in the respective Application form.</p> <p>Clauses</p> <p>7.5 There shall be an internal audit plan, checklist, and schedule available to cover the central office and member sites.</p> <p>7.6 Internal audits of the member site and central office shall be carried out at least annually and prior to application for Multi-site certification.</p> <ul style="list-style-type: none"> • the central office shall have a clear system for reporting on these inspections to the site managers. <p>Additional information/evidence is provided in the form of a audit reports. Three multi-site reports are provided and one single site report.</p>		<ul style="list-style-type: none"> • CoC audit reports x 4 • 3 x single site reports, 1 x multi site report • Unified Responsible Fisheries Management (RFM) Chain of Custody Standard • 7.5, 7.6 • https://cdn.rfmcertification.org/wp-content/uploads/2022/02/Unified-RFM-CoC-V2.5_Final_Website-Posting.pdf

SECTION D.
FISHERIES
CERTIFICATION
STANDARDS



D.1 GOVERNANCE AND MANAGEMENT APPROACH

D.1 GOVERNANCE AND MANAGEMENT APPROACH

D.1.01 Designated Authority

GSSI Component	Guidance
The standard requires the existence of a fishery management organization or arrangement that manages the fishery of which the Unit of Certification is a part.	A "fisheries management organization or arrangement" is defined by FAO (see Glossary). This term is used throughout the benchmarking framework and is intended to represent the "designated authority" mentioned in paragraphs 29.2 (36.2) and 29.4 (36.5) of the FAO Ecolabelling Guidelines. In this context it is essentially an entity holding the legal and generally recognized mandate for establishing fisheries management measures and taking management decisions such that those measures and decisions are legally enforceable. Where the stock under consideration is a transboundary fish stock, straddling fish stock, highly migratory fish stock or high seas fish stock it might also encompass a Regional Fisheries Management Organization (RFMO) – see Essential Component D.1.07. The fisheries management organization or arrangement may also be part of relevant traditional, fisher or community approaches to the management of the stock under consideration, provided their performance can be objectively verified (i.e. the knowledge has been collected and analyzed through a systematic, objective and well-designed process, and is not just hearsay).
Conclusion	References
<p>The RFM Program is in alignment because the existence of a fisheries management organization with responsibility for the Unit of Certification is both an explicit requirement of the standard and also an implicit pre-requisite built into many clauses.</p> <p>Explicit consideration is primarily provided by Clause 1.1, which states "There shall be an effective legal and administrative framework established at a local and national level appropriate for fishery resource conservation and management", and by Clause 1.2 which states "Management measures shall</p>	<ul style="list-style-type: none"> Flatfish certification https://rfmcertification.org/certified-fishery-species/alaska-flatfish/ Guidance to Performance Evaluation for the Certification of Wild Capture and Enhanced Fisheries in North America V2.1 Clauses 1.1 and 1.2 https://rfmcertification.org/wp-content/uploads/2021/06/AK-RFM-V2.1-GuidanceDraft-Jan-2021_Final.pdf

D.1 GOVERNANCE AND MANAGEMENT APPROACH

D.1.01 Designated Authority

consider (1) stock status (i.e. overfished biomass) and genetic diversity (stock structure) over its entire area of distribution, and (2) other biological characteristics of the fish stock (stock) including age of maturity and reproductive potential." The RFM Guidance expands on this at Clauses 1.1 and 1.2 with clear guidance on evaluation criteria (evidential requirements) and how to score conformity ratings.

The draft hake/whiting assessment report, currently out to public consultation, provides examples of these clauses in practice on pages 80–86.

The provided example from the flatfish complex shows clear use of the (then current) Guidance in reaching conclusions when rating against Version 1.3 of the Standard.

- Responsible Fisheries Management Fisheries Standard Version 2.1
- Clauses 1.1 and 1.2
- https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC-RFM-V2.1-StandardFINAL-Sept-2020_Final-1.pdf
- RFM US Pacific Hake/Whiting Fishery Full Assessment Report – Public Comment Report 20 June 2022
- <https://rfmcertification.org/wp-content/uploads/2022/06/hake-RFM-MASTER-REPORT-PCDR-FINAL.pdf>

D.1.02 Designated Authority

GSSI Component	Guidance
The standard requires that in order for the fishery management organization or arrangement to receive and respond to in a timely manner the best scientific evidence available (D.1.03–D.1.05) the fishery management organization or arrangement convenes regularly, as needed,	The focus of this Essential Component is the capacity of the fishery management organization or arrangement to receive and respond to in a timely manner the best scientific evidence available. The FAO Ecolabelling Guidelines do not specify a requirement for any specific frequency or type of meetings of the fishery management organization or arrangement. Paragraph 29.3 refers to the requirement for timely scientific advice on the likelihood and magnitude of identified impacts of the fishery on the ecosystem. Principle 2.10 of the Guidelines requires that schemes be based on the best scientific evidence available. Best scientific evidence available is defined in the Glossary as a process by which scientific advice is commissioned and solicited by the management system. The wording of this Essential Component is intended to ensure that the Standard requires that this is done in a timely and organized way that is properly documented.

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to manage the integrated process of information collection, stock assessment, planning, formulation of the management objectives and targets, establishing management measures and enforcement of fishery rules and regulations.

The CCRF also uses the word "timely" in many places in describing requirements for responsible fisheries management, e.g. Article 6.13 "timely solutions to urgent matters"; Article 7.4.4: "timely, complete and reliable statistics on catch and fishing effort are collected and maintained in accordance with applicable international standards and practices and in sufficient detail to allow sound statistical analysis. Such data should be updated regularly and verified through an appropriate system."; Article 12.3 requires that States should ensure that data generated by research are analyzed, that the results of such analyses are published, respecting confidentiality where appropriate, and distributed in a timely and readily understood fashion, in order that the best scientific evidence is made available as a contribution to fisheries conservation, management and development.

Conclusion

The RFM Program is in alignment because although "regular meetings" are not explicitly required by the Fishery Management Organization (FMO), delivery of timely information and best available scientific advice, etc. is required. Furthermore, the evidence cited, and checked in documentation and practices supports this conclusion.

Clause 1.7 of the Standard states: Within the fishery management system, procedures shall be in place to keep the efficacy of current conservation and management measures and their possible interactions under continuous review, and to revise or abolish them in the light of new information.

Meetings are intrinsic to fulfilling many of the requirements set out in the standard and guidance - for example, many clauses in the guidance recognize the records of meetings as evidence that the clause is met (e.g. 1.3, 3.2.3, 8.3). There are also many clauses which could not be met without regular meetings - for example, in Clause 1.1, a legal and administrative framework cannot be considered effective unless there is regular communication between the relevant authorities, industry and other stakeholders exchanging information and affecting decision making in a transparent way.

References

- Guidance to Performance Evaluation for the Certification of Wild Capture and Enhanced Fisheries in North America V2.1
 - Clauses 1.3, 3.2.3, 8.3, 4.1.1
 - https://rfmcertification.org/wp-content/uploads/2021/06/AK-RFM-V2.1-GuidanceDraft-Jan-2021_Final.pdf
- Responsible Fisheries Management Fisheries Standard Version 2.1
 - Clauses 1.1, 1.7, 1.3, 3.2.3, 8.3
 - https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC-RFM-V2.1-StandardFINAL-Sept-2020_Final-1.pdf

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A P P R O A C H

D.1.02 Designated Authority

In addition to this, there are clear requirements for these data to be collected, reviewed and distributed to enable the management system to operate and manage the fish resources under their jurisdiction.

Clause 4.1, All significant fishery removals and mortality of the target species (shall be considered by management. Specifically, reliable and accurate data required for assessing the status of fishery(ies) and ecosystems—including data on retained catch, bycatch, discards, and waste— shall be collected. Data can include relevant traditional, fisher, or community knowledge, provided their validity can be objectively verified. These data shall be collected, at an appropriate time and level of aggregation, by relevant management organizations connected with the fishery, and provided to relevant States regional, and international fisheries organizations.

Clause 4.1.1; Timely, complete and reliable statistics shall be compiled on catch and fishing effort and maintained in accordance with applicable international standards and practices and in sufficient detail to allow sound statistical analysis for stock assessment. Such data shall be updated regularly and verified through an appropriate system. The use of research results as a basis for the setting of management objectives, reference points and performance criteria, as well as for ensuring adequate linkage, between applied research and fisheries management (e.g. adoption of scientific advice) shall be promoted. Results of analysis shall be distributed accordingly as a contribution to fisheries conservation, management and development.

Clause 5.1.2; The fisheries management organization shall ensure that appropriate research is conducted into all aspects of fisheries including biology, ecology, technology, environmental science, economics, and fishery enhancement. Analysis results shall be distributed in a timely and readily understandable fashion in order that the best scientific evidence available contributes to fisheries conservation, management, and development. The fisheries management organization shall also ensure the availability of research facilities and provide appropriate training, staffing, and institution

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building to conduct the research. Furthermore, the following clause requires some of the information listed above to be available to ensure effective enforcement activities.

Clause 10.1; "Effective mechanisms shall be established for fisheries monitoring, surveillance, control and enforcement measures including, where appropriate, observer programs, inspection schemes and vessel monitoring systems, to ensure compliance with the conservation and management measures for the fishery in question. This could include relevant traditional, fisher or community approaches, provided their performance could be objectively verified."

D.1.03 Best Scientific Evidence Available

GSSI Component	Guidance	
The standard requires that the fishery management organization or arrangement receives and responds to in a timely manner the best scientific evidence available regarding the status of the stock under consideration and the likelihood and magnitude of adverse impacts of the unit of certification on the stock under consideration and the ecosystem.	This essential component is about the taking into account of the best scientific evidence available by the Fishery Management Organization in a timely manner. This relates to both stock status and fishery impacts, hence all are mentioned in the component language. Best scientific evidence available is described in the Glossary. For the stock under consideration it can derive from assessments of stock status outside of what is regarded as a traditional "stock assessment", accommodating techniques for data limited fisheries and including traditional knowledge, providing its validity can be objectively verified. The actions of the fishery management organization or arrangement in both receiving and responding to the best scientific evidence available must be in accordance with the Precautionary Approach (D.1.06). This Essential Component is also linked to those in D.3 that cover the collection and handling of data and information.	
Conclusion		References
The RFM Program is in alignment as Clause 5.1.2 states: The fisheries management organization shall ensure that appropriate research is conducted into all aspects of fisheries including biology, ecology, technology, environmental science, economics, and		<ul style="list-style-type: none"> Guidance to Performance Evaluation for the Certification of Wild Capture

D.1 GOVERNANCE AND MANAGEMENT APPROACH

D.1.03 Best Scientific Evidence Available

fishery enhancement. Analysis results shall be distributed in a timely and readily understandable fashion in order that the best scientific evidence available contributes to fisheries conservation, management, and development. The fisheries management organization shall also ensure the availability of research facilities and provide appropriate training, staffing, and institution building to conduct the research. Furthermore, the following clause requires some of the information listed above to be available to ensure effective enforcement activities.

The guidance document makes clear that this is a requirement both for the results of analyses to be made available to management organizations, and that these be provided in a timely fashion.

With respect to the application of the precautionary approach, Clause 7.1 states: "The precautionary approach shall be applied widely to conservation, management and exploitation of ecosystems to protect them and preserve the ecosystem. This should take due account of fishery enhancement procedures, where appropriate...." 7.1 also states, "Absence of adequate scientific information shall not be used as a reason for postponing or failing to take conservation and management measures. Relevant uncertainties shall be taken into account through a suitable method of risk management, including those associated with the use of introduced or translocated species". Taken together, they represent a clear requirement that fishery management organizations respond to scientific evidence in accordance with the precautionary approach.

With respect to the consideration of the ecosystem, Clause 12.1 states: "The fishery management organization shall assess the impacts of environmental factors on target stocks and associated or dependent species in the same ecosystem, and the relationship among the populations in the ecosystem".

Clause 12.2: The most probable adverse impacts from human activities, including fishery effects on the ecosystem/environment, shall be assessed and, where appropriate, addressed and or/corrected, taking into account available scientific information and local knowledge. This may take the form of

and Enhanced Fisheries in North America V2.1

- Clauses 5.1.2, 7.1, 12.1
- https://rfmcertification.org/wp-content/uploads/2021/06/AK-RFM-V2.1-GuidanceDraft-Jan-2021_Final.pdf
- Responsible Fisheries Management Fisheries Standard Version 2.1
- Clauses 5.1.2, 7.1
- https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC-RFM-V2.1-StandardFINAL-Sept-2020_Final-1.pdf

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D.1.03 Best Scientific Evidence Available

an immediate management response or a further analysis of the identified risk. In this context, full consideration should be given to the special circumstances and requirements in developing fisheries, including financial and technical assistance, technology transfer, training, and scientific cooperation. In the absence of specific information on the ecosystem impacts of fishing on the unit of certification, generic evidence based on similar fishery situations can be used for fisheries with low risk of severe adverse impact. However, the greater the risk, the more specific evidence shall be necessary to ascertain the adequacy of mitigation measures.

D.1.04 Best Scientific Evidence Available

GSSI Component	Guidance
The standard requires that management objectives take into account the best scientific evidence available.	<p>This Essential Component applies to all management objectives referred to in Essential Components under Performance Area D.2.</p> <p>Best scientific evidence available is described in the Glossary. It can come from assessments of stock status outside of the typical “stock assessment”, accommodating techniques for data limited fisheries and including traditional knowledge, providing its validity can be objectively verified (i.e. the knowledge has been collected and analyzed through a systematic process, and is not simply hearsay).</p> <p>Note that the requirement for the management system to take into account the best scientific evidence available is not inconsistent with the Precautionary Approach (see Essential Component D.1.06), which requires inter alia that the absence of adequate scientific information should not be used as a reason for postponing or failing to take conservation and management measures. Both of these requirements apply.</p>
Conclusion	References
The RFM Program is in alignment because this component is met by a combination of several clauses within the Standard.	<ul style="list-style-type: none"> Guidance to Performance Evaluation for the Certification of Wild Capture

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D.1.04 Best Scientific Evidence Available

The key clause is 8.1, which states: "Conservation and management measures shall be designed to ensure the long-term sustainability of fishery resources at levels which promote optimum utilization and are based on verifiable and objective scientific and/or traditional, fisher, or community sources." Clause 8.1.1 states "When evaluating alternative conservation and management measures, the fishery management organization shall consider their cost-effectiveness and social impact." The guidance makes clear that a high compliance rating can only be awarded when management measures are "based on objective, verifiable evidence".

Additional relevant clauses include Clause 4.1.1: "Timely, complete and reliable statistics shall be compiled on catch and fishing effort and maintained in accordance with applicable international standards and practices and in sufficient detail to allow sound statistical analysis for stock assessment. Such data shall be updated regularly and verified through an appropriate system. The use of research results as a basis for the setting of management objectives, reference points and performance criteria, as well as for ensuring adequate linkage, between applied research and fisheries management (e.g., adoption of scientific advice) shall be promoted. Results of analysis shall be distributed accordingly as a contribution to fisheries conservation, management, and development".

The guidance makes clear that a high compliance rating can only be awarded when there is "evidence ensuring a link between applied research and fisheries management" - i.e. that the results of the research are used to inform management decisions.

Clause 5.1.2; The fisheries management organization shall ensure that appropriate research is conducted into all aspects of fisheries including biology, ecology, technology, environmental science, economics, and fishery enhancement. Analysis results shall be distributed in a timely and readily understandable fashion in order that the best scientific evidence available contributes to fisheries conservation, management, and development. The fisheries management organization shall also

and Enhanced Fisheries in North America V2.1

- Clauses 8.1, 4.1.1, 5.1.2, Section 12
- https://rfmcertification.org/wp-content/uploads/2021/06/AK-RFM-V2.1-GuidanceDraft-Jan-2021_Final.pdf
- Responsible Fisheries Management Fisheries Standard Version 2.1
- Clause 8.1
- https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC-RFM-V2.1-StandardFINAL-Sept-2020_Final-1.pdf

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D.1.04 Best Scientific Evidence Available

ensure the availability of research facilities and provide appropriate training, staffing, and institution building to conduct the research. Furthermore, the following clause requires some of the information listed above to be available to ensure effective enforcement activities.

The over-arching requirement for Section 12, within which all of that section's clauses should be viewed, states; "Considerations of fishery interactions and effects on the ecosystem shall be based on best scientific evidence available, local knowledge where it can be objectively verified, and a risk assessment-based management approach for determining most probable adverse impacts. Adverse impacts on the fishery on the ecosystem shall be appropriately assessed and effectively addressed".

D.1.05 Best Scientific Evidence Available

GSSI Component	Guidance
The standard requires that management measures implemented through the management system to achieve the management objectives are based on the best scientific evidence available.	<p>This Essential Component applies to all management measures referred to in Essential Components under Performance Area D.5.</p> <p>Best scientific evidence available is described in the Glossary. Note that it includes traditional knowledge and can come from assessments of stock status outside of a typical stock assessment, accommodating techniques for data limited fisheries, providing their validity can be objectively verified (i.e. the knowledge has been collected and analyzed through a systematic process, and is not simply hearsay).</p> <p>Note also that the requirement for the management system to take into account the best scientific evidence available is not inconsistent with the Precautionary Approach (see Essential Component D.1.06), which requires inter alia that the absence of adequate scientific information should not be used as a reason for postponing or failing to take conservation and management measures. Both of these requirements apply.</p>

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D.1.05 Best Scientific Evidence Available

Conclusion	References
<p>The RFM Program is in alignment as Clause 5.1.2; "The fisheries management organization shall ensure that appropriate research is conducted into all aspects of fisheries including biology, ecology, technology, environmental science, economics, fishery enhancement. Analysis of results shall be distributed in a timely and readily understandable fashion in order that the best scientific evidence available contributes to fisheries conservation, management and development. The fisheries management organization shall also ensure the availability of research facilities and provide appropriate training, staffing and institution building to conduct the research."</p> <p>Clause 6.4 states, Management actions shall be agreed to in the eventuality that data sources and analyses indicate that these reference points have been exceeded. Accordingly, contingency plans shall be agreed in advance to allow an appropriate management response to serious threats to the resource as a result of overfishing, adverse environmental changes, or other phenomena that may have adverse e on impacts on the fishery resource (Appendix 1, Part 2). Such measures may be temporary and shall be based on best scientific evidence available.</p> <p>The overarching introduction of Section 12, Serious Impacts of the Fishery on the Ecosystem states, "Considerations of fishery interactions and effects on the ecosystem shall be based on best scientific evidence available, local knowledge where it can be objectively verified and using a risk assessment-based management approach for determining most probable adverse impacts. Adverse impacts on the fishery on the ecosystem shall be appropriately assessed and effectively addressed".</p>	<ul style="list-style-type: none"> • Responsible Fisheries Management Fisheries Standard Version 2.1 • Clause 5.1.2, 6.4, 7.2.3 • https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC-RFM-V2.1-StandardFINAL-Sept-2020_Final-1.pdf

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D.1.06 Precautionary Approach		
GSSI Component	Guidance	
The standard requires that the precautionary approach is applied widely through the management system to the conservation, management and exploitation of living aquatic resources in order to protect them and preserve the aquatic environment.	<p>The General Principles and Article 6.5 of the CCRF prescribe a precautionary approach to all fisheries, in all aquatic systems, regardless of their jurisdictional nature, recognizing that most problems affecting the fishing sector result from insufficiency of precaution in management regimes when faced with high levels of uncertainty.</p> <p>The precautionary approach referred to in this Essential Component is that elaborated in the FAO Document: Precautionary approach to capture fisheries and species introductions, FAO Technical Guidelines for Responsible Fisheries. No. 2. Rome, FAO. 1996.</p> <p>To meet this Essential Component, the standard must require inter alia that the management system uses a suitable method of risk management to take into account relevant uncertainties in the status of the stock under consideration and the impacts of the unit of certification on that stock and the ecosystem, including those associated with the use of introduced or translocated species. Where the application of less quantitative and data demanding approaches results in greater uncertainty, the management system should apply more precaution, which may necessitate lower levels of utilization of the resource.</p> <p>The FAO Guidelines (Paragraph 29.6) state that the absence of adequate scientific information should not be used as a reason for postponing or failing to take conservation and management measures.</p> <p>The FAO Guidelines (Paragraph 31) note that much greater scientific uncertainty is to be expected in assessing possible adverse ecosystem impacts of fisheries than in assessing the state of target stocks. This issue can be addressed by taking a risk assessment/risk management approach (see also D.4.07).</p> <p>The FAO Guidelines (Paragraph 32) also note that a past record of good management performance could be considered as supporting evidence of the adequacy of the management measures and the management system.</p> <p>The suitability of the method of risk management applied should be assessed by the technical team undertaking the assessment for certification.</p>	
Conclusion		References
The RFM Program is in alignment as Section 7 of the standard examines implementation of the precautionary approach. The overarching statement is: " Management actions and measures for		<ul style="list-style-type: none"> Guidance to Performance Evaluation for the Certification of Wild Capture

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D.1.06 Precautionary Approach

the conservation of stock and the ecosystem shall be based on the precautionary approach. Where information is deficient a suitable method using risk management shall be adopted to consider uncertainty."

Clause 7.1 states, "The precautionary approach shall be applied widely to conservation, management and exploitation ecosystems to protect them and preserve the ecosystem. This should take due account of fishery enhancement procedures, where appropriate. Absence of scientific information shall not be used as a reason for postponing or failing to take conservation and management measures. Relevant uncertainties shall be taken into account through a suitable method of risk assessment, including those associated with the use of introduced or translocated species."

The guidance for this clause clarifies that the precautionary approach must be demonstrably applied in regulation and laws, and also practically in the actions of management organizations and in technical measures. A risk-based approach where there is significant uncertainty is required by a number of other clauses throughout the Standard, including Clause 2.1: "Within the fisheries management organizations jurisdiction, an appropriate policy, legal and institutional framework shall be adopted in order to achieve sustainable and integrated use of living marine resources, (1) taking into account the fragility of coastal ecosystems and finite nature of their natural resources, (2) allowing for determination of the possible uses of coastal resources and governing access to them, (3) recognizing the rights and needs of coastal communities and their customary practices to the extent compatible with sustainable development. In setting policies for the management of coastal areas, States shall take due account of the risks and uncertainties involved."

The over-arching statement of Section 12, "Considerations of fishery interactions and effects on the ecosystem shall be based on best scientific evidence available, local knowledge where it can be objectively verified and using a risk assessment-based management approach for determining most probable adverse impacts. Adverse impacts on the fishery on the ecosystem shall be appropriately assessed and effectively addressed" both are relevant."

and Enhanced Fisheries in North America V2.1

- Clause 7.1
- https://rfmcertification.org/wp-content/uploads/2021/06/AK-RFM-V2.1-GuidanceDraft-Jan-2021_Final.pdf
- Responsible Fisheries Management Fisheries Standard Version 2.1
 - Clause 7.1, Section 7
 - https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC-RFM-V2.1-StandardFINAL-Sept-2020_Final-1.pdf
- RFM US Pacific Hake/Whiting Fishery Full Assessment Report – Public Comment Report 20 June 2022
 - <https://rfmcertification.org/wp-content/uploads/2022/06/hake-RFM-MASTER-REPORT-PCDR-FINAL.pdf>

D.1 GOVERNANCE AND MANAGEMENT APPROACH

D.1.06 Precautionary Approach

The draft hake/whiting assessment report, currently out to public consultation, provides examples of these clauses in practice on pages 225–233 (Section 7); 105–108 (Clause 2.1); and 240–261 (Section 12).

D.1.07 International Management

GSSI Component	Guidance
Where the stock under consideration is a transboundary fish stock, straddling fish stock, highly migratory fish stock or high seas fish stock, the standard requires the existence of a bilateral, subregional or regional fisheries organization or arrangement, as appropriate that is concerned with the management of the whole stock unit over its entire area of distribution.	This Essential Component is intended to build on D.1.01 to provide greater specificity in the event that the stock under consideration is a transboundary fish stock, straddling fish stock, highly migratory fish stock or high seas fish stock. In this case, as well as the national authority with the legal and generally recognized mandate for establishing fisheries management measures and taking management decisions, there is expected to be an international institution or arrangement established (usually between two or more States) to be responsible for coordination of activities related to fisheries management over the entire area of distribution of the stock. This is to make sure that management of these stocks and fleets that fish on them is coordinated at the international level. Activities of the international institution or arrangement may include consultation between parties to the agreement or arrangement, formulation of fishery regulations and their implementation, allocation of resources, collection of information, stock assessment, as well as monitoring, control and surveillance (MCS). (e.g. a Regional Fisheries Management Organization – RFMO). See also CCRF Article 7.1.3 et seq. See also D.1.11, D.1.12 and D.1.13.
Conclusion	References
The RFM Program is in alignment because Clause 1.3 of the Standard states: Where transboundary, shared, straddling, highly migratory, or high seas fish stocks are exploited by two or more States (neighboring or not), the applicant and appropriate management organizations concerned shall cooperate and take part	<ul style="list-style-type: none"> Guidance to Performance Evaluation for the Certification of Wild Capture and Enhanced Fisheries in North America V2.1 Clause 1.3

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D.1.07 International Management

in the formal fishery commission or arrangements appointed to ensure effective conservation and management of the stock(s) in question and their environment.

The guidance makes clear that as a bare minimum, there must be a formal regime in place for international cooperation, and furthermore that if this regime is not effective at ensuring the sustainable exploitation of the resource this represents a major non-conformance. Additionally, Clause 1.2 states:

"Management measures shall take into account the whole stock unit over its entire area of stock distribution". The guidance makes clear that in the case of biological stocks which are exploited by more than one country, this component extends to international management.

- https://rfmcertification.org/wp-content/uploads/2021/06/AK-RFM-V2.1-GuidanceDraft-Jan-2021_Final.pdf
- Responsible Fisheries Management Fisheries Standard Version 2.1
 - Clause 1.3
 - https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC-RFM-V2.1-StandardFINAL-Sept-2020_Final-1.pdf

D.1.08 Participatory Management

GSSI Component	Guidance
The standard requires the governance and fisheries management system under which the unit of certification is managed to be both participatory and transparent,	<p>Participatory is described in the Glossary. Principle 2.4 (2.5) of the FAO Guidelines requires ecolabelling schemes to be transparent, including balanced and fair participation by all interested parties. Requiring the standard also to require that the governance and management system being assessed is participatory and transparent (i.e. not just the scheme/standard itself) is consistent with paragraph 6.13 of the CCRF, which states that: States should, to the extent permitted by national laws and regulations, ensure that decision making processes are transparent and achieve timely solutions to urgent matters. States, in accordance with appropriate procedures, should facilitate consultation and the effective participation of industry, fishworkers, environmental and other interested organizations in decision-making with respect to the development of laws and policies related to fisheries management, development, international lending and aid.</p> <p>To meet this Essential Component, the standard must require the fisheries management organization or arrangement to make information and advice used in its decision-making publicly available, to the extent allowed by national laws and regulations. While it is possible for an organization to be separately participatory or transparent, being one without the other</p>

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D.1.08 Participatory Management

to the extent permitted by national laws and regulations.	is regarded as of much less value, hence both are needed to meet this Essential Component. A participatory approach to fisheries management requires there to be an opportunity for all interested and affected parties to be involved in the management process. This does not mean that stakeholders are necessarily required to have specific decision rights in the fishery, or that participatory mechanisms must be included in National laws, but there should be a consultation process that regularly seeks and accepts relevant information, including traditional, fisher or community knowledge and there should be a transparent mechanism by which the management system demonstrates consideration of the information obtained.
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Conclusion	References
<p>The RFM Program is in alignment because:</p> <p>PARTICIPATORY: Clause 8.3, The fishery management organization shall seek to identify domestic parties having a legitimate interest in the use and management of the fishery. When deciding on use, conservation, and management of the resource, due recognition shall be given, where relevant, in accordance with national laws and regulations, to the traditional practices, needs, and interests of indigenous people and local fishing communities which are highly dependent on these resources for their livelihood. Arrangements shall be made to consult all the interested parties and gain their collaboration in achieving responsible fisheries.</p> <p>Additionally, Clause 2.2 states: "Representatives of the fisheries sector and fishing communities shall be consulted in the decision-making processes involved in other activities related to coastal area management planning and development", thus ensuring that the coastal management process as a whole is participatory.</p> <p>TRANSPARENCY: Clause 1.8 states: "The management arrangements and decision-making processes for the fishery shall be organized in a transparent manner". The guidance document makes clear that a lack of transparency in both management arrangement and decision making would result in critical non-conformance. Additionally, Clause 2.4 states, in relation to coastal area management: States' fisheries management organizations and sub-regional or regional fisheries management organizations and arrangements shall give due publicity to conservation and management</p>	<ul style="list-style-type: none"> • Responsible Fisheries Management Fisheries Standard Version 2.1 • Clauses 8.3, 2.2, 1.8, 2.4 • https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC-RFM-V2.1-StandardFINAL-Sept-2020_Final-1.pdf

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D.1.08 Participatory Management

measures and ensure that laws, regulations, and other legal rules governing their implementation are effectively disseminated. The bases and purposes of such measures shall be explained to users of the resource in order to facilitate their application and thus gain increased support in the implementation of such measures.

D.1.09 Small Scale and/or Data Limited Fisheries

GSSI Component	Guidance
The standard is applicable to governance and management systems for small scale and/or data limited fisheries, with due consideration to the availability of data and the fact that management systems can differ substantially for different types	<p>Being data limited is not necessarily synonymous with being small scale (hence the and/or in the Essential Component text), but the issues for fishery management may be similar.</p> <p>The scheme and standard should be applicable to any fishery that falls within the scheme's geographic scope, i.e. different types and scales of fisheries, including potentially small scale and/or data limited fisheries. If a scheme has a part of its standard that applies only to a subset of fisheries, such as small scale and/or data limited fisheries, then it needs to explain under what circumstances that part of the standard would be invoked. This same logic would apply to other potential subsets of fisheries such as deep sea, low trophic level, salmon etc. This should not mean, however, the standard for these subsets of fisheries is fundamentally different (e.g. lowered) compared to the standard applicable to other fisheries. Being applicable to small scale and/or data limited fisheries relates to being able to take into consideration different kinds of information and utilize different fishery management approaches in a risk management context. In order to be applicable to governance and management systems for small scale and data limited fisheries, the standard should also be applicable to relevant traditional, fisher or community approaches used by the fisheries management organization or arrangement to manage the unit of certification, provided their performance can be objectively verified. Evidence to verify the performance of the relevant traditional, fisher or community approaches would need to be established by the certification body implementing the standard and could be derived, for example, from the assessment of conformance with other GSSI Essential Components, in particular those covering the Stock and Ecosystem Status and Outcomes (D.6).</p>

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D.1.09 Small Scale and/or Data Limited Fisheries

and scales of fisheries.	If the scheme is generally applicable to all types of fisheries, (i.e. including small scale and/or data limited fisheries), then there is no need to explain the specific applicability, but in this case it may be harder for the scheme to demonstrate that the standard is indeed applicable to governance and management systems for small scale and/or data limited fisheries. In this context, it is important to recognize the great diversity of small-scale and/or data limited fisheries, as well as the fact that there is no single, agreed definition of these terms (see the Glossary). Small-scale fisheries represent a diverse and dynamic subsector, often characterized by seasonal migration. The precise characteristics of the subsector vary depending on the location. Accordingly, GSSI does not prescribe a specific definition of small-scale fisheries or data limited fisheries.
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Conclusion

The RFM Program is in alignment because a Data Deficient Fisheries Framework (DDFF) is available

The DDF was trialed on US Alaska SE Dungeness Crab. Copy of report is available in the evidence. Section 2 states "The validation assessment of the US Alaska Southeast Dungeness Crab Commercial fishery also used the Alaska RFM Data Deficient Framework (DDF) for fundamental clause 6 (referring to stock assessment)".

Outcomes of the assessment are included in the report

References

- Data Deficient Scoring Guidance V2.0
- <https://cdn.rfmcertification.org/wp-content/uploads/2021/06/AK-RFM-V2.0-Data-Deficient-Fisheries-Framework-Addendum-to-Scoring-Guidance-FINAL-DRAFT-Oct2016.pdf>
- Dungeness crab report for validation of the DDF

D.1.10 Management System Compliance

GSSI Component	Guidance
The standard requires that the fisheries management system under which the unit of certification is managed operates in compliance with local, national and international laws and regulations, including the requirements of any	Under this Essential Component the standard requires that the fisheries management system must operate legally (locally, nationally and internationally); the legality of the fishery (i.e. compliance with applicable fishing regulations) is covered under other requirements in this Performance Area. The term "fisheries management system" is distinct from the "fishery management organization or arrangement" Both of these terms are defined in the glossary.

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D.1.10 Management System Compliance

regional fisheries management organization that exercises internationally recognized management jurisdiction over the fisheries on the stock under consideration.	For the purposes of clarity, this Essential Component includes compliance with the rules and regulations of any RFMO/A that exercises internationally recognized management jurisdiction over fisheries on the stock under consideration in the high seas and implementation of the United Nations General Assembly (UNGA) Resolution 61/105, paragraphs 76–95 concerning responsible fisheries in the marine ecosystem.
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Conclusion	References
<p>The RFM Program is in alignment because the over-arching requirement of Section 1 of the RFM Standard is: "There shall be a structured and legally mandated management system based upon and respecting International, National and Local fishery laws, for the responsible utilization of the stock under consideration and conservation of the marine environment".</p> <p>This requirement forms a component of several of the clauses within section 1; for example, Clause 1.1 states; "There shall be an effective legal and administrative framework established at local and national level appropriate for fishery resource conservation and management". The guidance document makes clear that one component of this clause is that the management framework should be "in compliance with legislative and regulatory requirements at the local and national level".</p> <p>With regards to compliance with RFMO decisions, Clause 1.3 states; Where transboundary, shared, straddling, highly migratory, or high seas fish stocks are exploited by two or more States (neighboring or not), the applicant and appropriate management organizations concerned shall cooperate and take part in the formal fishery commission or arrangements appointed to ensure effective conservation and management of the stock(s) in question and their environment.</p> <p>Other relevant clauses include 1.4.1, A fishery management organization seeking to take any action through a non-fishery organization which may affect the conservation and management measures</p>	<ul style="list-style-type: none"> Responsible Fisheries Management Fisheries Standard Version 2.1 Section 1, Clauses 1.1, 1.3, 1.4.1 https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC-RFM-V2.1-StandardFINAL-Sept-2020_Final-1.pdf

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D.1.10 Management System Compliance

taken by a competent sub-regional or regional fisheries management organization or arrangement shall consult with the latter, in advance to the extent practicable, and take its views into account.

and 11.3, Fisheries management organizations shall ensure that sanctions for IUU fishing by vessels and, to the greatest extent possible, nationals under its jurisdiction are of sufficient severity to effectively prevent, deter, and eliminate IUU fishing and to deprive offenders of the benefits accruing from such fishing. This may include the adoption of a civil sanction regime based on an administrative penalty scheme. Fisheries management organizations shall ensure the consistent and transparent application of sanctions.

D.1.11 Fishery Compliance

GSSI Component	Guidance
The standard requires that the fishery of which the Unit of Certification is a part is managed under an effective legal framework at the local, national or regional (international) level as appropriate.	<p>Legal framework is described in the Glossary. An effective legal framework is one that is shown to be fit for purpose, such that the fishery seeking certification proceeds in an orderly and well controlled manner. An effective legal framework should enable the fisheries management organization or arrangement to perform its functions without hindrance from systemic and repeated illegal activity. An effective legal framework can be one that incorporates traditional, fisher or community approaches (e.g. co-management under community approaches) provided their performance can be objectively verified. With respect to fisheries in the high seas, the legal obligations of UNCLOS and UNFSA have particular relevance. See also Essential Component D.1.12 regarding the need for effective and suitable monitoring, surveillance, control and enforcement of the fishery of which the unit of certification is a part.</p> <p>Evidence of the performance of the legal framework can be derived from the assessment of conformance with other Essential Components, in particular D.1.12 and D.1.13 covering compliance and enforcement.</p>
Conclusion	References
The RFM Program is in alignment because Clause 1.1 states "There shall be an effective	<ul style="list-style-type: none"> Guidance to Performance Evaluation for the Certification of Wild Capture and Enhanced Fisheries in North America V2.1

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D.1.11 Fishery Compliance

legal and administrative framework established at local and national level appropriate for fishery resource conservation and management". The guidance makes clear that the legal basis for fishery management at the local and national level is a key component for this clause.

- Clause 1.1
- https://rfmcertification.org/wp-content/uploads/2021/06/AK-RFM-V2.1-GuidanceDraft-Jan-2021_Final.pdf
- Responsible Fisheries Management Fisheries Standard Version 2.1
- Clause 1.1
- https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC-RFM-V2.1-StandardFINAL-Sept-2020_Final-1.pdf

D.1.12 Fishery Compliance

GSSI Component	Guidance
The standard requires effective and suitable monitoring, surveillance, control and enforcement of the fishery of which the unit of certification is a part.	<p>Effective and suitable monitoring, surveillance, control and enforcement is described in the Glossary. Evidence of high levels of compliance in the fishery of which the Unit of Certification is a part with all applicable local, national and international laws and regulations (as appropriate, per Essential Component D.1.10) would be indicative of effective monitoring, surveillance, control and enforcement. The suitability of monitoring, surveillance, control and enforcement for the fishery of which the Unit of Certification is a part should be assessed by the technical team undertaking the assessment for certification relative to the standard.</p> <p>Both this Essential Component and Essential Component D.1.11 (effective legal framework) derive from Paragraph 29.5 (36.6) of the Ecolabelling Guidelines which refers to "the fishery". It is, therefore, the effective and suitable monitoring, surveillance, control and enforcement of the "fishery" (see Glossary) that is the subject of this Essential Component, and this may extend beyond the unit of certification (as per paragraph 25 of the Guidelines, the unit of certification could encompass: the whole fishery, where a fishery refers to the activity of one particular gear-type or method leading to the harvest of one or more species; a sub-component of a fishery, for example a national fleet fishing a shared stock; or several fisheries operating on the same resources). If the stock under consideration is not transboundary, then the Standard need only be concerned with the effectiveness and suitability of the monitoring,</p>

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surveillance, control and enforcement activities at the national level for the fishery of which the Unit of Certification is a part. For transboundary stocks, however, there are several Essential Components that apply such that the Standard must be concerned with fishery management and compliance at the international level and the status of the whole stock across its entire range. Essential Component D.1.11 covers the need for an effective legal framework at the local, national or regional (international) level as appropriate and Essential Component D.1.13 covers the need for the Unit of Certification to be operating in compliance with the requirements of local, national and international law and regulations. Under Essential Component D.1.07, where the stock under consideration is a transboundary fish stock, straddling fish stock, highly migratory fish stock or high seas fish stock, the standard must require the existence of a bilateral, subregional or regional fisheries organization or arrangement (e.g. an RFMO), as appropriate, covering the stock under consideration over its entire area of distribution. This is to make sure that management of these stocks and fleets that fish on them is coordinated at the international level. RFMOs are not generally responsible directly for monitoring, surveillance, control and enforcement; this is done by national authorities (i.e. of vessels operating within their waters of national jurisdiction and also of vessels flying their flag when they are fishing outside of those waters). If the Unit of Certification is part of a national fleet fishing on a transboundary stock, then it is still likely to be the effectiveness and suitability of the monitoring, surveillance, control and enforcement activities at the national level which is of prime importance for certification. If the Unit of Certification covers all the fishing on the stock under consideration, then the monitoring, surveillance, control and enforcement all of the national fleets is of concern. Note also that under Essential Component D.4.02 (assessment of the stock under consideration), the Standard must require assessment of the current status and trends of the stock under consideration to consider total fishing mortality on that stock from all sources, and under Essential Component D.6.01, the stock under consideration must not be overfished. Hence any deficiencies in the monitoring, surveillance, control and enforcement of fleets fishing on a stock under consideration that is a transboundary fish stock, straddling fish stock, highly migratory fish stock or high seas fish stock that compromise the effective assessment of the status of that stock would need to be of concern for certification.

Article 7.7.2 of the CCRF requires states to ensure that laws and regulations provide for sanctions applicable in respect of violations which are adequate in severity to be effective.

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D.1.12 Fishery Compliance

Article 7.7.3 of the CCRF requires states, in conformity with their national laws, to implement effective fisheries monitoring, control, surveillance and law enforcement measures including, where appropriate, observer programs, inspection schemes and vessel monitoring systems. Standards may refer to these mechanisms as appropriate.

Conclusion

The RFM Program is in alignment because Clause 10.1 states: "Effective mechanisms shall be established for fisheries monitoring, surveillance, control and enforcement measures including, where appropriate, observer programmes, inspection schemes and vessel monitoring systems, to ensure compliance with the conservation and management measures for the fishery in question. This could include relevant traditional fisher or community approaches, provided their performance could be objectively verified".

The guidance clarifies that for a high compliance rating, a fishery must demonstrate effective observer, inspection and vessel monitoring schemes, and also that data should be provided to quantify boarding inspections and violations, etc. Clauses 10.3–10.4.1 include specific requirements for monitoring, control, surveillance and enforcement of fishing activities in international waters.

The GSSI glossary defines 'monitoring' as "The continuous requirement for the measurement of fishing effort characteristics and resource yields". To this end Clause 4.1, is relevant

All significant fishery removals and mortality of the target species (shall be considered by management. Specifically, reliable and accurate data required for assessing the status of fishery(ies) and ecosystems—including data on retained catch, bycatch, discards, and waste— shall be collected. Data can include relevant traditional, fisher, or community knowledge, provided their validity can be objectively verified. These data shall be collected, at an appropriate time and level of aggregation, by relevant management organizations connected with the fishery, and provided to relevant States regional, and international fisheries organizations.

References

- Guidance to Performance Evaluation for the Certification of Wild Capture and Enhanced Fisheries in North America V2.1
- Clauses 10.1, 1.3 to 10.4.1
- https://rfmcertification.org/wp-content/uploads/2021/06/AK-RFM-V2.1-GuidanceDraft-Jan-2021_Final.pdf
- Responsible Fisheries Management Fisheries Standard Version 2.1
- Clauses 10.1, 10.3, 10.4.1, 5.2
- Sanctions covered in Section 11 – There shall be a framework for sanctions for violations and illegal activities of adequate severity to support compliance and discourage violations.
- <https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC->

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Clause 10.2 is also relevant, as it states: "Fishing vessels shall not be allowed to operate on the resource in question without specific authorization". Clause 4.2 states: "An observer scheme designed to collect accurate data for research and support compliance with applicable fishery management measures shall be established". This relates to both monitoring and enforcement.

Sanctions are examined by Section 11, with Clause 11.1 stating: "National laws of adequate severity shall be in place that provide for effective sanctions". Clause 11.2 examines the effectiveness of such sanctions in more detail, stating: "Sanctions applicable in respect of violations and illegal activities shall be adequate in severity to be effective in securing compliance and discouraging violations wherever they occur". The guidance makes clear that the scoring for this clause depends upon the examination of evidence that sanctions are effective at deterring illegal activities.

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D.1.13 Fishery Compliance

GSSI Component	Guidance
The standard requires that the Unit of Certification operates in compliance with the requirements of local, national and	<p>This requirement covers the compliance of the Unit of Certification with all applicable laws and regulations. Paragraph 28 (35) of the Ecolabelling Guidelines requires compliance both by the fishery and the management system. The requirement for the management system to be in compliance with applicable laws and regulations is addressed in Essential Component D.1.10.</p> <p>Conformance with this Essential Component should be considered alongside Essential Component D.1.12 – the requirement for effective and suitable monitoring, surveillance, control and enforcement. Conformance with this Essential Component requires there to be no evidence of systematic (methodical, regular, organized) or systemic (universal, throughout the system) non-compliance by fishers in the unit of certification with the requirements of local, national and international law and regulations. However, a lack of evidence of non-compliance by itself may not be sufficient if the monitoring, surveillance, control and enforcement is not effective and suitable for the fishery. Evidence of non-compliance may come from a variety of sources, including local and national monitoring, surveillance, control and enforcement programs, regional fisheries</p>

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D.1.13 Fishery Compliance

international law and regulations.	management organizations (RFMOs), and third party bodies such as industry organizations and non-governmental organizations. The Standard should require all of these sources to be consulted and taken into consideration.
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Conclusion

The RFM Program is in alignment because the RFM standard includes clear requirements that monitoring, surveillance, control, enforcement and sanctions (to ensure fisheries regulation compliance) be effective at ensuring compliance and discouraging violations.

Clause 11 There shall be a framework for sanctions for violations and illegal activities of adequate severity to support compliance and discourage violations.

In particular, Clause 11.2 examines the effectiveness of sanctions in detail, stating; "Sanctions applicable in respect of violations and illegal activities shall be adequate in severity to be effective in securing compliance and discouraging violations wherever they occur". The guidance for the clause includes, under the second evaluation parameter, that "There is evidence that the fishery operates in compliance with laws and regulations".

References

- Guidance to Performance Evaluation for the Certification of Wild Capture and Enhanced Fisheries in North America V2.1
- Clauses 11.2
- https://rfmcertification.org/wp-content/uploads/2021/06/AK-RFM-V2.1-GuidanceDraft-Jan-2021_Final.pdf
- Responsible Fisheries Management Fisheries Standard Version 2.1
- Clause 11.2
- https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC-RFM-V2.1-StandardFINAL-Sept-2020_Final-1.pdf

D.1.14 Management Documentation

GSSI Component	Guidance
The standard requires the existence of documented	A documented management approach or other management framework is an important component of the Management System. It provides clarity and transparency with respect to how the system is intended to function. The establishment of management approaches for the stock under consideration may not be entirely within the purview of

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D.1.14 Management Documentation

management approaches or other management framework covering the unit of certification and the stock under consideration, including management measures consistent with achieving management objectives for the stock under consideration.	<p>the fishery management organization or arrangement that manages the fishery of which the Unit of Certification is a part. The stock's distribution may extend beyond its area of jurisdiction and there may be other fisheries targeting the stock under consideration that fall under a separate administrative jurisdiction (potentially in another country). Nevertheless, the management measures that apply to the unit of certification should be consistent with achieving management objectives for the stock under consideration.</p> <p>There is no uniform way that management approaches need to be documented (for example they do not have to be all within one overarching Fishery Management Plan), but the standard must require the various elements of the management system to be present and identifiable and in use by the fishery management organization or arrangement (D.1.01), including the constitution and rules and procedures of the Fisheries Management Organization or Arrangement and the compliance regime (D.1.01-D.1.03; D.1.07); the legal framework (D.1.11); the management objectives (D.2); methodologies (D.4) although not necessarily all within one overarching Fishery Management Plan. It should be expected that the documentation would be current. The frequency of updates should be consistent with the requirements of meeting the management objectives and implementing management measures.</p>
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Conclusion	References
<p>The RFM Program is in alignment because the standard requires in Clause 1.1 that; "There shall be an effective legal and administrative framework established at local and national level appropriate for fishery resource conservation and management".</p> <p>And in Clause 3.1; "Long term management objectives shall be translated into a plan or other management document and be subscribed to by all interested parties"</p>	<ul style="list-style-type: none"> Responsible Fisheries Management Fisheries Standard Version 2.1 Clauses 1.1, 3.1 https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC-RFM-V2.1-StandardFINAL-Sept-2020_Final-1.pdf

D.1.15 Management Documentation

GSSI Component	Guidance
The Standard requires that the methodology and results of	This Essential Component is included under the Element of Management Documentation but is essentially about transparency. It is linked with Essential Component D.1.08 that addressed Participatory

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D.1.15 Management Documentation

assessments of the current status and trends of the stock under consideration are made publicly available in a timely manner, respecting confidentiality where appropriate.

Management. To meet that Essential Component, the standard must require the fisheries management organization or arrangement to make information and advice used in its decision-making publicly available. The methodology and results of assessments of the current status and trends of the stock under consideration is part of the information and advice used in this decision-making. The publication of this information may be constrained by legitimate rules governing confidentiality.

Conclusion

The RFM Program is in alignment because the standard includes the following relevant clauses: Clause 1.8, "The management arrangements and decision-making processes for the fishery shall be organized in a transparent manner".

Clause 2.2, "Representatives of the fisheries sector and fishing communities shall be consulted in the decision-making processes involved in other activities related to coastal area management planning and development. The public shall also be kept aware on the need for the protection and management of coastal resources and the participation in the management process by those affected."

Clause 5.1.2; The fisheries management organization shall ensure that appropriate research is conducted into all aspects of fisheries including biology, ecology, technology, environmental science, economics, and fishery enhancement. Analysis results shall be distributed in a timely and readily understandable fashion in order that the best scientific evidence available contributes to fisheries conservation, management, and development. The fisheries management organization shall also ensure the availability of research facilities and provide appropriate training, staffing, and institution building to conduct the research. Furthermore, the following clause requires some of the information listed above to be available to ensure effective enforcement activities.

Clause 5.5, "Data generated by research shall be analyzed and the results of such analyses published in a way that ensures confidentiality is respected, where appropriate".

References

- Responsible Fisheries Management Fisheries Standard Version 2.1
- Clauses 1.8, 2.2, 5.1.2, 5.5, 6.3
- https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC-RFM-V2.1-StandardFINAL-Sept-2020_Final-1.pdf

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Clause 6.3 states "Data and assessment procedures shall be installed measuring the position of the fishery in relation to the reference points. Accordingly, the stock under consideration shall not be overfished (i.e. above limit reference point or proxy) and the level of fishing permitted shall be commensurate with the current state of the fishery resources, maintaining its future availability, taking into account that long term changes in productivity can occur due to natural variability and/or impacts other than fishing." All these analyses are entirely available in the public domain.

D.1.16 Management Documentation

GSSI Component	Guidance
The Standard requires that the methodology and results of the analysis of the most probable adverse impacts of the unit of certification and any associated culture and enhancement activity on the ecosystem are made publicly available in a timely manner, respecting confidentiality where appropriate.	This Essential Component is included under the Element of Management Documentation, but is essentially about transparency. It is linked with Essential Component D.1.08 that addressed Participatory Management. To meet that Essential Component, the standard must require the fisheries management organization or arrangement to make information and advice used in its decision-making publicly available. The methodology and results of the analysis of the most probable adverse impacts of the unit of certification and any associated culture and enhancement activity on the ecosystem is part of the information and advice used in this decision-making. The publication of this information may be constrained by legitimate rules governing confidentiality.
Conclusion	References
<p>The RFM Program is in alignment because the standard includes the following relevant clauses: Clause 1.8, "The management arrangements and decision-making processes for the fishery shall be organized in a transparent manner".</p> <p>Clause 2.4 States' fisheries management organizations and sub-regional or regional fisheries management organizations and arrangements shall give due publicity to conservation and</p>	<ul style="list-style-type: none"> Responsible Fisheries Management Fisheries Standard Version 2.1 Clauses 1.8, 2.4, 5.1.2, 5.5, 12.2 https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC-

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management measures and ensure that laws, regulations, and other legal rules governing their implementation are effectively disseminated. The bases and purposes of such measures shall be explained to users of the resource in order to facilitate their application and thus gain increased support in the implementation of such measures.

Clause 5.1.2, "States shall ensure that appropriate research is conducted into all aspects of fisheries including biology, ecology, technology, environmental science, economics, social science, aquaculture and nutritional science. Results of analyses shall be distributed in a timely and readily understandable fashion in order that the best scientific evidence is made available as a contribution to fisheries conservation, management and development. States shall also ensure the availability of research facilities and provide appropriate training, staffing and institution building to conduct the research, taking into account the special needs of developing countries."

Clause 5.5, "Data generated by research shall be analyzed and the results of such analyses published in a way that ensures confidentiality is respected, where appropriate".

And Clause 12.2, The most probable adverse impacts from human activities, including fishery effects on the ecosystem/environment, shall be assessed and, where appropriate, addressed and or/corrected, taking into account available scientific information and local knowledge. This may take the form of an immediate management response or a further analysis of the identified risk. In this context, full consideration should be given to the special circumstances and requirements in developing fisheries, including financial and technical assistance, technology transfer, training, and scientific cooperation. In the absence of specific information on the ecosystem impacts of fishing on the unit of certification, generic evidence based on similar fishery situations can be used for fisheries with low risk of severe adverse impact. However, the greater the risk, the more specific evidence shall be necessary to ascertain the adequacy of mitigation measures.

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D.1.17 Consultation and Review

GSSI Component	Guidance
The standard requires that the efficacy of management measures and their possible interactions is kept under continuous review, taking into account the multipurpose nature of the use patterns in inland and marine waters.	<p>The purpose of consultation and review regarding the efficacy of conservation and management measures and their possible interactions is to ensure that there is a well based expectation that management will be successful, taking into account uncertainty and imprecision. "Management measures" in this Requirement are the measures referred to in the other Essential Components in this Performance Area. They are regarded as being synonymous with the "conservation and management measures" referred to in CCRF Article 7.6.8.</p> <p>The expression "taking into account the multipurpose nature of the use patterns in inland and marine waters" refers to the uncertainty arising from other (non-fishery) impacts on the fishery. For example, if there are other users from other sectors, fishery management, although not being able to control those sectors, should take their impacts into account when devising the strategy for achieving management objectives. This is akin to taking into account all sources of mortality on the fish stock, from fishing and non-fishing sources. For example, if water is abstracted from rivers at certain times of the year and this has an adverse impact on the fish stock, management of the fishery should address that fact (perhaps by reducing fishing or having a closed season at this time), although not being able to influence when and to what extent the water is abstracted. In a coastal context, the fishery management should be integrated with coastal zone management to the extent necessary to account for non-fishing impacts.</p>
Conclusion	References
<p>The RFM Program is in alignment because the standard includes the following relevant clause:</p> <p>Clause 1.7 of the Standard states: Within the fishery management system, procedures shall be in place to keep the efficacy of current conservation and management measures and their possible interactions under continuous review, and to revise or abolish them in the light of new information.</p> <p>Clause 2.6, "States shall cooperate at the sub-regional level in order to improve coastal area management, and in accordance with capacities, measures shall be taken to establish or promote systems for research and monitoring of the coastal environment, in order to improve coastal area</p>	<ul style="list-style-type: none"> • Responsible Fisheries Management Fisheries Standard Version 2.1 • Clauses 1.7, 2.6 • https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC-RFM-V2.1-StandardFINAL-Sept-2020_Final-1.pdf

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D.1.17 Consultation and Review

management, and promote multidisciplinary research in support and improvement of coastal area management using physical, chemical, biological, economic, social, legal and institutional aspects."

D.2 MANAGEMENT OBJECTIVES

D.2.01 Certified Stocks

GSSI Component	Guidance	
The standard requires the existence of management objectives that are applicable to the unit of certification and the stock under consideration and seek outcomes consistent with the long term sustainable use of the fisheries resources under management.	<p>The Standard must show evidence of requiring the existence of clearly stated management objectives that meet the description in the Glossary. The appropriateness of those objectives is tested through the assessment of conformance with Essential Components in other Performance Areas, including, the actions (management measures, monitoring etc.) taken to meet them and the outcomes for the stock under consideration and the ecosystem.</p> <p>The "fishery" referred to in Paragraph 28 of the Guidelines encompasses both the unit of certification and the stock under consideration (as per paragraph 28.1), as do the management objectives referred to in this Essential Component.</p>	
Conclusion		References
<p>The RFM Program is in alignment because Section 3 of the RFM Standard has the over-arching statement: "Management objectives shall be implemented through management rules and actions formulated in a plan or other framework".</p> <p>Clause 3.1 states: "Long term management objectives shall be translated into a plan or other management document and be subscribed to by all interested parties". The guidance clarifies that for a high compliance rating, there must be long-term management objectives, and that they must be "considered effective for long term management of the resource". Further clauses in Section 3 ensure the management measures 'seek outcomes consistent with the long-term sustainable use of the fisheries resources under management' as follows:</p> <p>3.2 Management measures shall provide, inter alia, that:</p>		<ul style="list-style-type: none"> Responsible Fisheries Management Fisheries Standard Version 2.1 Section 3, Clause 3.1, 3.2, 3.2.1, 3.2.2 https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC-RFM-V2.1-StandardFINAL-Sept-2020_Final-1.pdf

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D.2.01 Certified Stocks

3.2.1 Excess fishing capacity shall be avoided and exploitation of the stocks shall remain economically viable.

3.2.2 The economic conditions under which fishing industries operate shall promote responsible fisheries.

D.2.02 Certified Stocks

GSSI Component	Guidance
The standard requires that the management objectives clearly define target and limit reference points, or proxies for the stock under consideration on the basis of the best scientific evidence available and in accordance with the Precautionary Approach. Target reference points must be consistent with achieving Maximum Sustainable Yield, MSY (or a suitable proxy) on average and limit reference points (or proxies) must be consistent with avoiding recruitment overfishing or other impacts	<p>The Glossary provides descriptions of target and limit reference points. Reference points must be set at levels consistent with achieving maximum sustainable yield (MSY) (or a suitable proxy) on average, or a lesser fishing mortality if that is optimal in the circumstances of the fishery (e.g. multispecies fisheries) or to avoid severe adverse impacts on dependent predators. To be effective, reference points must be incorporated within a framework of decision rules (See D.5.02) to ensure that the stock does not fall below a limit, Blim, at which recruitment could be significantly impaired, or lead to average recruitment that is significantly lower than it would be with a higher stock biomass. The level of Blim should be set on the basis of historical information, applying an appropriate level of precaution according to the reliability of that information. In addition, an upper limit should be set on fishing mortality, Flim, which is the fishing mortality rate that, if sustained, would drive biomass down to the Blim level.</p> <p>A proxy is a surrogate or substitute approach that results in acceptable outcomes consistent with the primary approach. In the context of reference points, when data are insufficient to estimate reference points directly other measures of productive capacity can serve as reasonable substitutes or “proxies”. Suitable proxies may be, for example, standardized cpue as a proxy for biomass or specific levels of fishing mortality and biomass which have proven useful in other fisheries and can be used with a reasonable degree of confidence in the absence of better defined levels. It is important to note that the use of a proxy may involve additional uncertainty, and if so, should trigger the use of extra precaution in the setting of biological reference points. The words “or proxies” are a</p>

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that are likely to be irreversible or very slowly reversible.

consideration for small scale and/or data limited fisheries. This should not be interpreted to mean that small scale and/or data limited fisheries do not require target and limit reference points, but that the methods used to develop them and monitor the stock status in relation to them may be less data intensive than for large scale fisheries. See also Essential Components D.1.09 and D.3.07.

Conclusion

The RFM Program is in alignment because the RFM standard contains a number of relevant clauses:

Clauses 6.1 and 6.2 make clear that target and limit reference points be must established, stating:

The fishery management organization shall establish safe target reference point(s) for management. Management targets are consistent with achieving maximum sustainable yield (MSY), a suitable proxy, or a lesser fishing mortality—if that is optimal in the circumstances of the fishery (e.g., multispecies fisheries) or is needed to avoid severe adverse impacts on dependent predators.

The fishery management organization shall establish appropriate limit reference point(s) for exploitation (i.e. consistent with avoiding recruitment overfishing or other impacts that are likely to be irreversible or very slowly reversible; Appendix 1, Part 1). When a limit reference point is approached, measures shall be taken to ensure that it will not be exceeded. For instance, if fishing mortality (or its proxy) is above the associated limit reference point, actions should be taken to decrease the fishing mortality (or its proxy) below that limit reference point.

The guidance explains that for a high compliance rating, not only must these reference points be established, but they must also be considered "appropriate and safe". The limit reference point should be "consistent with avoiding recruitment overfishing, or other impacts that are likely to be irreversible, or very slowly reversible".

Clause 6.1 states that the official target reference point or proxy is consistent with achieving maximum sustainable yield (MSY) or a suitable proxy, and there is evidence that it has been used as

References

- Guidance to Performance Evaluation for the Certification of Wild Capture and Enhanced Fisheries in North America V2.1
- Clauses 6.1, 6.2
- https://rfmcertification.org/wp-content/uploads/2021/06/AK-RFM-V2.1-GuidanceDraft-Jan-2021_Final.pdf
- Responsible Fisheries Management Fisheries Standard Version 2.1
- Clauses 6.1 and 6.2
- https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC-RFM-V2.1-StandardFINAL-Sept-2020_Final-1.pdf

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an objective by the management process. If there are historical instances of the reference point being approached or exceeded, managers have taken remedial action as appropriate. In the context of reference points, when data are insufficient to estimate reference points directly other measures of productive capacity can serve as reasonable substitutes or “proxies”.

Suitable proxies may be, for example, standardized CPUE as a proxy for biomass or specific levels of fishing mortality and biomass which have proven useful in other fisheries and can be used with a reasonable degree of confidence in the absence of better defined levels. It is important to note that the use of a proxy may involve additional uncertainty, and if so, should trigger the use of extra precaution in the setting of biological reference points.

D.2.03 Enhanced Fisheries

GSSI Component	Guidance
The standard requires, in the case of enhanced fisheries, the existence of management objectives consistent with avoiding significant negative impacts of enhancement activities on the natural reproductive	<p>All Essential Components that address Enhanced Fisheries can be "not applicable" to schemes that do not cover these fisheries. However, it is incumbent on the scheme to explicitly exclude enhanced fisheries (rather than explicitly include them) in order for these requirements to be not applicable. If the scheme remains silent on the issue of enhanced fisheries, then the standard could potentially be applied to fisheries that include enhanced components, but if these are not properly dealt with by the standard (i.e. as per GSSI Essential Components) then the scheme would be deficient when being used to certify such fisheries. In essence, the default position is that a scheme/standard can be applied to enhanced fisheries unless it excludes them explicitly.</p> <p>The term "significant negative impacts" is used in the FAO Inland Guidelines. This was not intended to be equivalent to "severe adverse impacts" (on dependent predators). The FAO consultation that resulted in the drafting of the Inland Guidelines considered that avoidance of "severe adverse impacts" only would not be consistent with a management obligation to manage enhancement in ways that would not impact the productivity and abundance of the natural reproductive stock component of the stock under consideration.</p>

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stock component of the stock under consideration and any other wild stocks from which the organisms for stocking are being removed.

Any displacement of the naturally reproductive stock components of enhanced stocks must not reduce the natural reproductive stock components below abundance-based Target Reference Points or their proxies. Note that the Target Reference Points are for the natural reproductive stock component. For example, in the case of salmon fisheries, if the spawning stock is comprised of fish both from enhanced and natural origins, the escapement goal considers only the natural origin component. An example Target Reference Point would be an escapement target based on the natural reproductive stock component.

Conclusion

The RFM Program is in alignment because the standard requires in Clause 13.7.1: Efforts shall be undertaken to minimize the adverse impacts of introducing non-native species or genetically altered stocks used for aquaculture into waters.

and 13.7.2 states: Steps shall be taken to minimize adverse genetic, disease, and other effects of escaped farmed fish (aquaculture) on wild stocks.

Clause 13.1.1. In the case of enhanced fisheries, the fishery management organization should take into account natural production, and shall take appropriate actions for conserving genetic diversity and biodiversity, protecting ETP species, maintaining aquatic ecosystems, minimizing adverse impacts on ecosystem structure and function, controlling disease, and maintaining the quality of enhanced stock. Enhanced fisheries may be supported in part by stocking organisms produced in aquaculture facilities or removed from wild stocks other than the stock under consideration. Aquaculture production for stocking purposes shall be managed and developed according to the above provisions.

The guidance for 13.1.1 specifies that "there are also management objectives consistent with avoiding significant negative impacts of enhancement activities on the natural reproductive stock

References

- Guidance to Performance Evaluation for the Certification of Wild Capture and Enhanced Fisheries in North America V2.1
- Clause 13.1.1
- https://rfmcertification.org/wp-content/uploads/2021/06/AK-RFM-V2.1-GuidanceDraft-Jan-2021_Final.pdf
- Responsible Fisheries Management Fisheries Standard Version 2.1
- Clauses 13.1.1, 13.7.1, 13.7.2
- https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC-RFM-V2.1-StandardFINAL-Sept-2020_Final-1.pdf

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component of the stock under consideration and any other wild stocks from which the organisms for stocking are being removed".

D.2.04 Non-certified Catches

GSSI Component	Guidance	
The standard requires management objectives that seek to ensure that catches and discards by the unit of certification of stocks other than the stock under consideration and any associated culture and enhancement activity do not threaten those stocks with recruitment overfishing or other impacts that are likely to be irreversible or very slowly reversible.	<p>This Essential Component covers "non-certified catches" which is everything other than the stock under consideration.</p> <p>This Essential Component is explicitly and deliberately confined to the effects of non-certified catches and discards by the unit of certification on those non-certified species/stocks. Cumulative effects on non-certified species/stocks are not included in the Ecolabelling Guidelines. They are not part of the Essential Components, but they are covered in the Supplemental Components. The part of the component relating to enhancement activity may be "not applicable" to schemes that explicitly do not cover enhanced fisheries.</p> <p>Examples of irreversible or very slowly reversible effects on bycatch species include excessive depletion of very long-lived organisms (see Glossary). To mitigate effects that are likely to be irreversible or very slowly reversible requires those effects to be made less severe such that they are no longer likely to be irreversible or very slowly reversible.</p>	
Conclusion		References
The RFM Program is in alignment because the standard requires in Clause 8.5.1: Appropriate measures shall be applied to minimize catch, waste, and discards of non-target species (both fish and non-fish species), and impacts on associated, dependent, or endangered species.		<ul style="list-style-type: none"> Responsible Fisheries Management Fisheries Standard Version 2.1 Clauses 8.5.1, 12.2.3, Section 13 https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC-

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D.2.04 Non-certified Catches

The guidance for the clause clarifies that these measures must be "considered effective" for the fishery to score a high conformance rating.

Additionally, Clause 12.6 states "Non target catches, including discards, of stocks other than the 'stock under consideration' shall be monitored and shall not threaten these non-target stocks with serious risk of extinction; if serious risks of extinction arise, effective remedial action shall be taken". Finally, throughout Section 13 there are clauses which require the monitoring and minimization of the potential impacts of non-target catches and discards on non-target stocks via consideration of the ecosystem.

Also relevant is Clause 12.2.3 There shall be outcome indicator(s) consistent with achieving management objectives for non-target species (i.e., avoiding overfishing and other impacts that are likely to be irreversible or very slowly reversible).

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D.2.05 Endangered Species

GSSI Component	Guidance
The standard requires the existence of management objectives that seek to ensure that endangered species are protected from adverse impacts resulting from interactions with the unit of certification and any associated culture or	The context of this Essential Component is Endangered Species. Endangered species are defined in the Glossary. These species are already adversely impacted at the population level, by definition, and are susceptible to further adverse impacts at this level from which they need to be protected. Where "adverse impacts" is used in the FAO Guidelines ("adverse impacts of the fishery on the ecosystem") there is no further qualification provided (i.e. no "significant" or "severe"). Elsewhere in the Guidelines, the term "adverse impacts" is qualified, but in each case this is in a very specific context. For example. the term "significant negative impacts" is used in the FAO Ecolabelling Guidelines only in relation to enhanced fisheries and "severe adverse impacts" is used only in relation to dependent predators. The term "significant adverse impacts" occurs only in the Deep Sea Guidelines with respect to VMEs.

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enhancement activity, including recruitment overfishing or other impacts that are likely to be irreversible or very slowly reversible.

The FAO Guidelines acknowledge that much greater scientific uncertainty is to be expected in assessing possible adverse ecosystem impacts of fisheries than in assessing the state of target stocks (paragraph 31 (41)), hence the management objectives to protect endangered species should take into account risk and uncertainty.

Conclusion

The RFM Program is in alignment because the RFM standard has the clause:

Clause 3.2.4 Biodiversity of aquatic ecosystems shall be conserved and ETP species shall be protected. Where relevant, there shall be pertinent objectives, and as necessary, management measures.

References

- Responsible Fisheries Management Fisheries Standard Version 2.1
- Clause 12.5.1, 3.2.4
- https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC-RFM-V2.1-StandardFINAL-Sept-2020_Final-1.pdf

D.2.06 Habitat

GSSI Component

The standard requires the existence of management objectives seeking to avoid, minimize or mitigate impacts of the unit of certification on essential habitats for the stock under consideration and on habitats that are highly vulnerable to damage by the fishing gear of the unit of certification.

Guidance

Essential habitats are described in the Glossary. The CCRF (Article 6.8) refers to "critical fisheries habitats in marine and fresh water ecosystems" which can be regarded as substantively the same as essential habitats for the purposes of the practical application of this Essential Component. Critical fisheries habitats in marine and fresh water ecosystems include wetlands, mangroves, reefs, lagoons, nursery and spawning areas. Examples of impacts on habitat that should be avoided include those listed in the CCRF: destruction, degradation, pollution and other significant impacts. In accordance with Paragraph 28.2 of the Ecolabelling Guidelines, in assessing fishery impacts, the full spatial range of the relevant habitat should be considered, not just that part of the spatial range that is potentially affected by fishing. The purpose of this is to consider both the degree to which the habitat is rare, or common, and also that there may be impacts on the same habitat in other parts of its spatial range.

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D.2.06 Habitat

Conclusion

The RFM Program is in alignment because the standard requires in

12.2.6 The fishery management organization shall consider the most probable adverse impacts of the unit of certification on habitats (Appendix 1, Part 5 and 7), by assessing and, where appropriate, addressing and or/correcting them, taking into account the best scientific evidence available and local knowledge.

12.2.7 There shall be knowledge of the essential habitats for the stock under consideration and potential fishery impacts on them. Impacts on essential habitats, and on habitats that are highly vulnerable to damage by the fishing gear involved, shall be avoided, minimized, or mitigated. In assessing fishery impacts, the full spatial range of the relevant habitat shall be considered, not just the part of the spatial range that is potentially affected by fishing.

12.2.8 There shall be outcome indicator(s) consistent with achieving management objectives for avoiding, minimizing, or mitigating the impacts of the unit of certification on essential habitats for the stock under consideration and on habitats that are highly vulnerable to damage by the fishing gear of the unit of certification.

6.5 Measures shall be introduced to identify and protect depleted stocks and those stocks threatened with depletion, and to facilitate the sustained recovery/restoration of such stocks. Also, efforts shall be made to ensure that resources and habitats critical to the well-being of such stocks, which have received adverse impacts by fishing or other human activities, are restored. Alaska crab Certification Report provides evidence of this.

References

- Responsible Fisheries Management Fisheries Standard Version 2.1
- Clause 12.2.6, 12.2.7, 12.2.8, 6.5
- https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC-RFM-V2.1-StandardFINAL-Sept-2020_Final-1.pdf

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D.2.07 Dependent Predators

GSSI Component	Guidance
The standard requires the existence of management objectives that seek to avoid severe adverse impacts on dependent predators resulting from fishing on a stock under consideration that is a key prey species.	This Essential Component is about objectives for fishing mortality on stocks under consideration that are key prey species, not about fishing mortality on Dependent Predators themselves. Where the stock under consideration is a key prey species, the standard must require that fishing mortality on that species/stock is managed so as not to result in severe adverse impacts on Dependent Predators. The FAO Guidelines require that all sources of fishing mortality on the stock under consideration are taken into account (whether or not it is a prey species) in assessing the state of the stock under consideration, including discards, unobserved mortality, incidental mortality, unreported catches and catches in other fisheries. Management measures to meet these objectives are required under D.5.08. Severe adverse impacts are mentioned in the Essential Components only in relation to dependent predators. This is in line with the Ecolabelling Guidelines. The severity of adverse impacts is related to their potential reversibility. Severe adverse impacts can be regarded as those that are likely to be irreversible or very slowly reversible, which is described in the Glossary.
Conclusion	References
<p>The RFM Program is in alignment because the RFM Standard requires in</p> <p>Clause 12.3 The role of the stock under consideration in the food web shall be considered, and if it is a key prey species in the ecosystem, management objectives and measures shall be in place to avoid severe adverse impacts on dependent predators.</p> <p>The draft hake/whiting assessment report, currently out to public consultation, provides an example of this clause in practice on pages 259–260.</p>	<ul style="list-style-type: none"> Responsible Fisheries Management Fisheries Standard Version 2.1 Clause 12.3 https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC-RFM-V2.1-StandardFINAL-Sept-2020_Final-1.pdf RFM US Pacific Hake/Whiting Fishery Full Assessment Report – Public Comment Report 20 June 2022 https://rfmcertification.org/wp-content/uploads/2022/06/hake-RFM-MASTER-REPORT-PCDR-FINAL.pdf

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D.2.08 Ecosystem Structure, Processes and Function

GSSI Component	Guidance
The standard requires the existence of management objectives that seek to minimize adverse impacts of the unit of certification, including any associated enhancement activities if applicable, on the structure, processes and function of aquatic ecosystems that are likely to be irreversible or very slowly reversible.	<p>This Essential Component covers adverse impacts on the structure, processes and function of aquatic ecosystems. Ecosystem structure, processes and function are described in the Glossary. The Guidelines do not extend consideration of these impacts to all fisheries operating in the ecosystem where the unit of certification is operating and therefore this is not included in this Essential Component. This language is in accordance with Section 4.1.4.1 of the FAO Ecosystem Approach to Fisheries, which suggests one of the broad management objectives for fisheries could be to keep impact on the structure, processes and functions of the ecosystem at an acceptable level.</p> <p>An earlier version of the requirements included an Essential Component on the conservation of biodiversity. Conservation of biodiversity is not mentioned separately in the Guidelines, but it is included in the CCRF Article 7.2.2 (d), which requires that States and sub-regional or regional fisheries management organizations and arrangements should adopt appropriate measures, based on the best scientific evidence available to provide that inter alia biodiversity of aquatic habitats and ecosystems is conserved. The structure, processes and function of aquatic ecosystems includes biodiversity, hence this is considered to be included in this Essential Component.</p> <p>Examples of irreversible or very slowly reversible indirect effects on the ecosystem include genetic modification and changed ecological role.</p>
Conclusion	References
<p>The RFM Program is in alignment because Version 2.1 of the RFM includes Clause 3.2 and subclauses 3.2 Management measures shall provide, inter alia, that:</p> <p>3.2.1 Excess fishing capacity shall be avoided, and exploitation of the stocks shall remain economically viable.</p> <p>3.2.2 The economic conditions under which fishing industries operate shall promote responsible fisheries.</p>	<ul style="list-style-type: none"> Responsible Fisheries Management Fisheries Standard Version 2.1 Clause 3.2.2 and all subclauses https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC-RFM-V2.1-StandardFINAL-Sept-2020_Final-1.pdf

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3.2.3 The interests of fishers, including those engaged in subsistence, small-scale, and artisanal fisheries shall be taken into account.

3.2.4 Biodiversity of aquatic ecosystems shall be conserved and ETP species shall be protected. Where relevant, there shall be pertinent objectives, and as necessary, management measures.

D.2.09 Small Scale and/or Data Limited Fisheries

GSSI Component	Guidance
The standard requires that management objectives for the unit of certification and the stock under consideration take into account the interests of fishers engaged in subsistence, small-scale and artisanal fisheries, where applicable.	<p>This Essential Component derives from paragraphs 7.2.1 and 7.2.2 of the CCRF. It cuts across the other components covering management objectives and looks for the requirement to take into account the interests of fishers engaged in small scale and artisanal fisheries in the development of these objectives.</p> <p>Section 7.2 of the CCRF is titled "Management Objectives". Paragraph 7.2.1 of the CCRF calls for the adoption of appropriate measures (not objectives), based on the best scientific evidence available, which are designed to maintain or restore stocks at levels capable of producing maximum sustainable yield, as qualified by relevant environmental and economic factors, including the special requirements of developing countries. Paragraph 7.2.2 states that such measures should provide that the interests of fishers, including those engaged in subsistence, small-scale and artisanal fisheries, are taken into account. While this language refers specifically to "measures", the need for objectives for those measures is implied, particularly given the text is in section 7.2 which is titled "Management Objectives".</p>
Conclusion	References
The RFM Program is in alignment because the following requirement is introduced by Clause 3.2.3: "The interests of fishers, including those engaged in subsistence, small-scale, and artisanal fisheries shall be taken into account". Further evidence that this clause puts the RFM Program in alignment with this component can be found in the RFM assessment guidance for Clause 3.2.3, which states variously as follows:	<ul style="list-style-type: none"> RFM Program Guidance to Performance Evaluation for the Certification of Wild Capture and Enhanced Fisheries in North America Clause 3.2.3

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D.2.09 Small Scale and/or Data Limited Fisheries

"There is a system or process in place that identifies the interests of small-scale fishers, either through stakeholder engagement or social research, in away, which permits the utilization of the information during the management measure development process"

"There is evidence that the interests of small-scale fishers are effectively taken into account during the development of management measures, and there is no evidence that small-scale fisheries are adversely impacted by any management measures currently in place".

Although Clause 3.2.3 does not explicitly mention management objectives, this is because the requirement covers the entire management system and therefore includes management objectives implicitly.

- https://cdn.rfmcertification.org/wp-content/uploads/2021/06/AK-RFM-V2.1-GuidanceDraft-Jan-2021_Final.pdf
- RFM Standard Version 2.1
- Clause 3.2.3
- https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC-RFM-V2.1-StandardFINAL-Sept-2020_Final-1.pdf

D.3 DATA AND INFORMATION

D.3.01 Certified Stocks

GSSI Component	Guidance
The standard requires the collection and maintenance of adequate, reliable and current data and/or other information about the state and trends of the stock under consideration in accordance with applicable international standards and practices.	<p>Adequate, reliable and current data and/or other information are those which are commensurate with the development and delivery of the best scientific evidence available. In this case, the requirement for data collection is focused on the assessment of the status and trends of stock under consideration (see Essential Components D.4.01–D.4.03). Adequate, reliable and current data and/or other information can include relevant traditional, fisher or community knowledge, provided its validity can be objectively verified.</p> <p>Some fisheries and/or fish stock are hard to monitor for various reasons, including remoteness of operation/distribution and complexity of fishing operations, posing particular challenges with the collection and maintenance of adequate, reliable and current data and/or other information. To meet this Essential Component the standard must require the fishery to acknowledge and explain these challenges and data collection and maintenance to cover all stages of fishery development, in accordance with applicable international standards and practices.</p> <p>Applicable international standards and practices include the output of the Coordinating Working Party on Fishery Statistics (CWP) and the FAO Guidelines for the routine collection of capture fishery data (1998) FAO Fisheries Technical Paper. No. 382.</p>
Conclusion	References
<p>The RFM Program is in alignment because the standard includes the following relevant clauses:</p> <p>Clause 4.1, All significant fishery removals and mortality of the target species (shall be considered by management. Specifically, reliable and accurate data required for assessing the status of fishery(ies) and ecosystems—including data on retained catch, bycatch, discards, and waste— shall be collected. Data can include relevant traditional, fisher, or community knowledge, provided their</p>	<ul style="list-style-type: none"> Responsible Fisheries Management Fisheries Standard Version 2.1 Clauses 4.1, 4.1.1, 5.2, 5.4 https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC-

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validity can be objectively verified. These data shall be collected, at an appropriate time and level of aggregation, by relevant management organizations connected with the fishery, and provided to relevant States regional, and international fisheries organizations.

Clause 4.1.1, "Timely, complete and reliable statistics shall be compiled on catch and fishing effort and maintained in accordance with applicable international standards and practices and in sufficient detail to allow sound statistical analysis for stock assessment. Such data shall be updated regularly and verified through an appropriate system. The use of research results as a basis for the setting of management objectives, reference points and performance criteria, as well as for ensuring adequate linkage, between applied research and fisheries management (e.g. adoption of scientific advice) shall be promoted. Results of analysis shall be distributed accordingly as a contribution to fisheries conservation, management and development."

Clause 5.2, "There shall be established research capacity necessary to assess and monitor 1) the effects of climate or environment change on fish stocks and aquatic ecosystems, 2) the state of the stock under State jurisdiction, and for 3) the impacts of ecosystem changes resulting from fishing pressure, pollution or habitat alteration."

Clause 5.4,

The fishery management organizations shall directly, or in conjunction with other States, develop collaborative technical and research programs to improve understanding of the biology, environment, and status of transboundary shared, straddling, highly migratory and high seas stocks.

The draft hake/whiting assessment report, currently out to public consultation, provides examples of these clauses in practice on pages 180 (Clause 4.1); 184 (Clause 4.1.1); 208 (Clause 5.2); and 211 (Clause 5.4).

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- RFM US Pacific Hake/Whiting Fishery Full Assessment Report – Public Comment Report 20 June 2022
- <https://rfmcertification.org/wp-content/uploads/2022/06/hake-RFM-MASTER-REPORT-PCDR-FINAL.pdf>

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D.3.02 Ecosystem Structure, Processes and Function

GSSI Component	Guidance
The standard requires the collection and maintenance of adequate, reliable and current data and/or other information about the effects of the unit of certification, including any associated enhancement activities, on ecosystem structure, processes and function in accordance with applicable international standards and practices.	<p>Adequate, reliable and current data and/or other information is described in the Glossary. In general, these are data which are commensurate with the development and delivery of the best scientific evidence available. The requirements for data collection are focused on the effects of the unit of certification on the ecosystem, including direct and indirect effects. The adequacy of data relates primarily to the quantity and type of data collected (including sampling coverage) and depends crucially on the nature of the systems being monitored and purposes to which the data are being put. Some analysis of the precision resulting from sampling coverage would normally be part of an assessment of adequacy and reliability. The currency of data is important <i>inter alia</i> because its capacity for supporting reliable assessment of current status and trends declines as it gets older. Adequate, reliable and current data and/or other information can include relevant traditional, fisher or community knowledge, provided its validity can be objectively verified (i.e. the knowledge has been collected and analyzed through a systematic, objective and well-designed process, and is not just hearsay).</p> <p>The requirements for data collection are focused on the effects of the unit of certification on the ecosystem structure, processes, and function. The component relating to enhancement activities may be "not applicable" to schemes that explicitly do not cover enhanced fisheries.</p> <p>Ecosystem structure, processes and function are described in the Glossary. This language is in accordance with Section 4.1.4.1 of the FAO Ecosystem Approach to Fisheries, which suggests one of the broad management objectives for fisheries could be to keep impact on the structure, processes and functions of the ecosystem at an acceptable level.</p> <p>Applicable international standards and practices include the output of the Coordinating Working Party on Fishery Statistics (CWP) and the FAO Guidelines for the routine collection of capture fishery data (1998) FAO Fisheries Technical Paper. No. 382.</p>

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Conclusion	References
<p>The RFM Program is in alignment because the standard includes the following relevant clauses:</p> <p>Clause 4.1.1, "Timely, complete and reliable statistics shall be compiled on catch and fishing effort and maintained in accordance with applicable international standards and practices and in sufficient detail to allow sound statistical analysis for stock assessment. Such data shall be updated regularly and verified through an appropriate system. The use of research results as a basis for the setting of management objectives, reference points and performance criteria, as well as for ensuring adequate linkage, between applied research and fisheries management (e.g. adoption of scientific advice) shall be promoted. Results of analysis shall be distributed accordingly as a contribution to fisheries conservation, management and development."</p> <p>Clause 5.2, "There shall be established research capacity necessary to assess and monitor 1) the effects of climate or environment change on fish stocks and aquatic ecosystems, 2) the state of the stock under State jurisdiction, and for 3) the impacts of ecosystem changes resulting from fishing pressure, pollution or habitat alteration."</p> <p>Clause 12.1, The fishery management organization shall assess the impacts of environmental factors on target stocks and associated or dependent species in the same ecosystem, and the relationship among the populations in the ecosystem.</p> <p>Clause 12.2, The most probable adverse impacts from human activities, including fishery effects on the ecosystem/environment, shall be assessed and, where appropriate, addressed and or/corrected, taking into account available scientific information and local knowledge. This may take the form of an immediate management response or a further analysis of the identified risk. In this context, full consideration should be given to the special circumstances and requirements in developing fisheries, including financial and technical assistance, technology transfer, training, and scientific cooperation. In the absence of specific information on the ecosystem impacts of fishing on the unit</p>	<ul style="list-style-type: none"> • Responsible Fisheries Management Fisheries Standard Version 2.1 • Clauses 4.1, 5.2, 12.1, 12.2, 13.1 • https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC-RFM-V2.1-StandardFINAL-Sept-2020_Final-1.pdf

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D.3.02 Ecosystem Structure, Processes and Function

of certification, generic evidence based on similar fishery situations can be used for fisheries with low risk of severe adverse impact. However, the greater the risk, the more specific evidence shall be necessary to ascertain the adequacy of mitigation measures.

Clause 13.1, The fishery management organization shall promote responsible development and management of fisheries enhancement, including an advanced evaluation of the effects of fisheries enhancement on genetic diversity and ecosystem integrity, based on the best scientific evidence available and/or verifiable and objective traditional, fisher, or community knowledge. Significant uncertainty is to be expected in assessing possible adverse ecosystem impacts of fisheries, including culture and enhancement activities. This issue can be addressed by taking a risk assessment/risk management approach.

D.3.03 Non-certified Catches

GSSI Component	Guidance
The standard requires the collection and maintenance of adequate, reliable and current data and/or other information on non-certified catches and	<p>Adequate, reliable and current data and/or other information is described in the Glossary. In general these are data which are commensurate with the development and delivery of the best scientific evidence available. The requirements for data collection are focused on the need to assess the effects of the unit of certification on non-target stocks. Non-certified catches and discards refers to species/stocks that are taken by the unit of certification other than the stock for which certification is being sought (see Glossary).</p> <p>The adequacy of data relates primarily to the quantity and type of data collected (including sampling coverage) and depends crucially on the nature of the systems being monitored and purposes to which the data are being put. Some analysis of the precision resulting from sampling coverage would normally be part of an assessment of adequacy and reliability. The currency of data is important inter alia because its capacity for supporting reliable assessment of current status and trends declines as it gets older. Adequate, reliable and current data and/or other information can include relevant traditional, fisher</p>

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D.3.03 Non-certified Catches

discards in the unit of certification.	<p>or community knowledge, provided its validity can be objectively verified (i.e. the knowledge has been collected and analyzed through a systematic, objective and well-designed process, and is not just hearsay).</p> <p>The requirements for data collection in this Essential Component are focused on the effects of the unit of certification on non-certified species/stocks. Non-certified catches/stocks are described in the Glossary. Catches of Endangered species are covered in Essential Component D.3.04.</p> <p>Applicable international standards and practices include the output of the Coordinating Working Party on Fishery Statistics (CWP) and the FAO Guidelines for the routine collection of capture fishery data (1998) FAO Fisheries Technical Paper. No. 382.</p>
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Conclusion	References
<p>The RFM Program is in alignment because the standard includes the following relevant clauses:</p> <p>Clause 4.1, All significant fishery removals and mortality of the target species (shall be considered by management. Specifically, reliable and accurate data required for assessing the status of fishery(ies) and ecosystems—including data on retained catch, bycatch, discards, and waste— shall be collected. Data can include relevant traditional, fisher, or community knowledge, provided their validity can be objectively verified. These data shall be collected, at an appropriate time and level of aggregation, by relevant management organizations connected with the fishery, and provided to relevant States regional, and international fisheries organizations.</p> <p>Clause 12.6, "Non target catches, including discards, of stocks other than the 'stock under consideration' shall be monitored and shall not threaten these non-target stocks with serious risk of extinction; if serious risks of extinction arise, effective remedial action shall be taken".</p>	<ul style="list-style-type: none"> • Responsible Fisheries Management Fisheries Standard Version 2.1 • Clauses 4.1, 12.6 • https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC-RFM-V2.1-StandardFINAL-Sept-2020_Final-1.pdf

D . 3 D A T A A N D I N F O R M A T I O N

D.3.04 Endangered Species

GSSI Component	Guidance
The standard requires the collection and maintenance of adequate, reliable and current data and/or other information about the effects of the unit of certification, including any associated enhancement activities, on endangered species in accordance with applicable international standards and practices.	<p>Adequate, reliable and current data and/or other information is described in the Glossary. In general these are data which are commensurate with the development and delivery of the best scientific evidence available. The requirements for data collection are focused on the effects of the unit of certification on the ecosystem, including direct and indirect effects. The adequacy of data relates primarily to the quantity and type of data collected (including sampling coverage) and depends crucially on the nature of the systems being monitored and purposes to which the data are being put. Some analysis of the precision resulting from sampling coverage would normally be part of an assessment of adequacy and reliability. The currency of data is important inter alia because its capacity for supporting reliable assessment of current status and trends declines as it gets older. Adequate, reliable and current data and/or other information can include relevant traditional, fisher or community knowledge, provided its validity can be objectively verified (i.e. the knowledge has been collected and analyzed through a systematic, objective and well-designed process, and is not just hearsay).</p> <p>The requirements for data collection are focused on the effects of the unit of certification on endangered species. The component relating to enhancement activities may be "not applicable" to schemes that explicitly do not cover enhanced fisheries. Endangered species are described in the Glossary.</p> <p>Applicable international standards and practices include the output of the Coordinating Working Party on Fishery Statistics (CWP) and the FAO Guidelines for the routine collection of capture fishery data (1998) FAO Fisheries Technical Paper. No. 382.</p>
Conclusion	References
<p>The RFM Program is in alignment because the standard includes the following relevant clauses:</p> <p>Clause 4.1, All significant fishery removals and mortality of the target species (shall be considered by management. Specifically, reliable and accurate data required for assessing the status of fishery(ies) and ecosystems—including data on retained catch, bycatch, discards, and waste— shall be collected. Data can include relevant traditional, fisher, or community knowledge, provided their</p>	<ul style="list-style-type: none"> Responsible Fisheries Management Fisheries Standard Version 2.1 Clauses 4.1, 12.6, 12.12 https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC-

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D.3.04 Endangered Species

validity can be objectively verified. These data shall be collected, at an appropriate time and level of aggregation, by relevant management organizations connected with the fishery, and provided to relevant States regional, and international fisheries organizations.

Clause 12.6, "Non target catches, including discards, of stocks other than the "stock under consideration" shall be monitored and shall not threaten these non-target stocks with serious risk of extinction, recruitment overfishing or other impacts that are likely to be irreversible or very slowly reversible; if such impacts arise, effective remedial action shall be taken."

Clause 12.12, "There shall be outcome indicator(s) consistent with achieving management objectives that seek to ensure that endangered species are protected from adverse impacts resulting from interactions with the unit of certification and any associated culture or enhancement activity, including recruitment overfishing or other impacts that are likely to be irreversible or very slowly reversible."

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D.3.05 Habitat

GSSI Component	Guidance
The standard requires that there is knowledge within the fishery management system of the essential habitats for the stock under consideration and habitats that are highly vulnerable to damage by the fishing gear of the unit of certification. This includes knowledge of the full spatial range	The level of knowledge of the essential habitats for the stock under consideration and habitats that are highly vulnerable to damage by the fishing gear of the unit of certification should provide sufficient understanding to enable impacts of the unit of certification on those habitats to be avoided, minimized or mitigated, i.e. for the management objective with respect to habitat (D.2.06) to be achieved. The achievement of this Essential Component should be considered alongside D.4.08 and D.6.07. In particular, the FAO Ecolabelling Guidelines acknowledge the importance of a "risk assessment/risk management approach" to address the issue of greater scientific uncertainty associated with ecosystem impacts; also that the most probable adverse impacts should be considered, taking into account available scientific information, and traditional, fisher or community knowledge provided that its validity can be objectively

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D.3.05 Habitat

of the relevant habitat, not just that part of the spatial range that is potentially affected by fishing.	verified. The knowledge of the habitats in question can therefore include relevant traditional, fisher or community knowledge, provided its validity can be objectively verified (i.e. the knowledge has been collected and analyzed through a systematic, objective and well-designed process, and is not just hearsay).
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Conclusion	References
<p>The RFM Program is in alignment because the standard includes the following relevant clauses:</p> <p>Clause 5.2, "There shall be established research capacity necessary to assess and monitor 1) the effects of climate or environment change on fish stocks and aquatic ecosystems, 2) the state of the stock under State jurisdiction, and for 3) the impacts of ecosystem changes resulting from fishing pressure, pollution or habitat alteration."</p> <p>Clause 12.2.7, "There shall be knowledge of the essential habitats for the 'stock under consideration' and potential fishery impacts on them. Impacts on essential habitats and on habitats that are highly vulnerable to damage by the fishing gear involved shall be avoided, minimized or mitigated. In assessing fishery impacts, the full spatial range of the relevant habitat shall be considered, not just that part of the spatial range that is potentially affected by fishing".</p> <p>Clause 12.6, "Research shall be promoted on the environmental and social impacts of fishing gear and, in particular, on the impact of such gear on biodiversity and coastal fishing communities."</p> <p>The draft hake/whiting assessment report, currently out to public consultation, provides examples of these clauses in practice on pages 208-209 (Clause 5.2); 252 (Clause 12.2.7); and 258 (Clause 12.6).</p>	<ul style="list-style-type: none"> Responsible Fisheries Management Fisheries Standard Version 2.1 Clauses 5.2, 12.9, 12.10 https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC-RFM-V2.1-StandardFINAL-Sept-2020_Final-1.pdf RFM US Pacific Hake/Whiting Fishery Full Assessment Report – Public Comment Report 20 June 2022 https://rfmcertification.org/wp-content/uploads/2022/06/hake-RFM-MASTER-REPORT-PCDR-FINAL.pdf

D.3.06 Dependent Predators

GSSI Component	Guidance
The standard requires that data and information are	The data and information collected must be sufficient to provide adequate knowledge of the role of the stock under consideration in the food-web to determine whether it is a key prey species and, if so, whether fishing on

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D.3.06 Dependent Predators

collected on the role of the stock under consideration in the food-web to enable determination of whether it is a key prey species in the ecosystem, and if so whether fishing on that stock might result in severe adverse impacts on dependent predators.

that stock under consideration might result in severe adverse impacts on dependent predators. Where the stock under consideration is a key prey species, the standard must require that fishing mortality on that species/stock is managed so as not to result in severe adverse impacts on Dependent Predators. The FAO Guidelines require that all sources of fishing mortality on the stock under consideration are taken into account (whether or not it is a prey species) in assessing the state of the stock under consideration, including discards, unobserved mortality, incidental mortality, unreported catches and catches in other fisheries.

Data and information on the role of the stock under consideration in the food-web can include relevant traditional, fisher or community knowledge, provided its validity can be objectively verified (i.e. the knowledge has been collected and analyzed through a systematic, objective and well-designed process, and is not just hearsay).

Conclusion

The RFM Program is in alignment because the standard includes the following relevant clauses:

Clause 4.1, All significant fishery removals and mortality of the target species (shall be considered by management. Specifically, reliable and accurate data required for assessing the status of fishery(ies) and ecosystems—including data on retained catch, bycatch, discards, and waste— shall be collected. Data can include relevant traditional, fisher, or community knowledge, provided their validity can be objectively verified. These data shall be collected, at an appropriate time and level of aggregation, by relevant management organizations connected with the fishery, and provided to relevant States regional, and international fisheries organizations.

Clause 4.6, The fisheries management organization shall investigate and document traditional fisheries knowledge and technologies—in particular those applied to small-scale fisheries—in order to assess their application to sustainable fisheries conservation, management, and development.

References

- Responsible Fisheries Management Fisheries Standard Version 2.1
- Clauses 4.1, 4.6, 12.1, 12.7
- https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC-RFM-V2.1-StandardFINAL-Sept-2020_Final-1.pdf
- RFM Guidance
- See Appendix 1, pg 150
- AK-RFM-V2.0-GuidanceFINAL-May-2018-New-Seal-Oct2019.pdf

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D.3.06 Dependent Predators

Clause 12.1, The fishery management organization shall assess the impacts of environmental factors on target stocks and associated or dependent species in the same ecosystem, and the relationship among the populations in the ecosystem.

12.3 The role of the stock under consideration in the food web shall be considered, and if it is a key prey species⁽²⁾ in the ecosystem, management objectives and measures shall be in place to avoid severe adverse impacts on dependent predators. ⁽²⁾See Appendix 1 page 150 of the RFM Guidance Document.

clause 12.4 There shall be outcome indicator consistent with achieving management objectives seeking to avoid severe impacts on dependent predators resulting from the unit of certification fishing on the stock under consideration that is a key prey species

D.3.07 Small Scale and/or Data Limited Fisheries

GSSI Component	Guidance
The standard requires that any traditional, fisher or community knowledge used within the management system can be objectively verified.	The methods by which traditional, fisher or community knowledge can be objectively verified will vary between fisheries, and will need to be assessed by the auditors. Elsewhere in the Benchmark there is the general suggestion that the knowledge should be collected and analyzed through a systematic, objective and well-designed process, and is not be just hearsay. Scientific uncertainty associated with the use of traditional, fisher or community knowledge can be assessed using a risk assessment/risk management approach, as specified in the Guidelines. In all cases, the management measures implemented by the management system must be based on the best scientific evidence available (Essential Components D.1.03 to D.1.04).

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D.3.07 Small Scale and/or Data Limited Fisheries

Conclusion	References
<p>The RFM Program is in alignment because the standard includes the following relevant clauses:</p> <p>Clause 4.6, The fisheries management organization shall investigate and document traditional fisheries knowledge and technologies—in particular those applied to small-scale fisheries—in order to assess their application to sustainable fisheries conservation, management, and development.</p> <p>Clause 8.1 provides that: Conservation and management measures shall be designed to ensure the long-term sustainability of fishery resources at levels which promote optimum utilization, and are based on verifiable and objective scientific and/or traditional, fisher, or community sources.</p> <p>Clause 8.1.1 When evaluating alternative conservation and management measures, the fishery management organization shall consider their cost-effectiveness and social impact.</p> <p>Over-arching Section 12 also states: "Considerations of fishery interactions and effects on the ecosystem shall be based on best available science, local knowledge where it can be objectively verified and using a risk based management approach for determining most probable adverse impacts. Adverse impacts on the fishery on the ecosystem shall be appropriately assessed and effectively addressed".</p>	<ul style="list-style-type: none"> • Responsible Fisheries Management Fisheries Standard Version 2.1 • Clauses 4.6, 8.1, Section 12 • https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC-RFM-V2.1-StandardFINAL-Sept-2020_Final-1.pdf

D.3.08 Enhanced Fisheries

GSSI Component	Guidance
In the case of enhanced fisheries, the standard requires the collection and maintenance of adequate, reliable and	Collection and maintenance of adequate, reliable and current data and/or other information about enhanced components of the stock under consideration is necessary to assess whether Enhanced Fisheries meet the criteria specified in the Inland Guidelines (starting with paragraph 38) necessary for them to be within scope. Adequate, reliable and current data and/or other information are those which are commensurate with the

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D.3.08 Enhanced Fisheries

current data and/or other information about enhanced components of the stock under consideration in accordance with applicable international standards and practices.

development and delivery of the best scientific evidence available. In this case, the requirement for data collection is focused on any enhanced components of the stock under consideration. Adequate, reliable and current data and/or other information can include relevant traditional, fisher or community knowledge, provided its validity can be objectively verified. Applicable international standards and practices include the output of the Coordinating Working Party on Fishery Statistics (CWP) and the FAO Guidelines for the routine collection of capture fishery data (1998) FAO Fisheries Technical Paper. No. 382.

Conclusion

The RFM Program is in alignment because the collection and maintenance of information about the enhanced components of the stock is a core consideration evidence throughout Section 13 of the RFM Standard, which has an over-arching requirement that "Where fisheries enhancement is utilized, environmental assessment and monitoring shall consider genetic diversity and ecosystem integrity". Clauses which are particularly relevant to this essential component are as follows:

Clause 13.1, The fishery management organization shall promote responsible development and management of fisheries enhancement, including an advanced evaluation of the effects of fisheries enhancement on genetic diversity and ecosystem integrity, based on the best scientific evidence available and/or verifiable and objective traditional, fisher, or community knowledge. Significant uncertainty is to be expected in assessing possible adverse ecosystem impacts of fisheries, including culture and enhancement activities. This issue can be addressed by taking a risk assessment/risk management approach.

Clause 13.3, "Effective procedures specific to fisheries enhancement activities shall be established to undertake appropriate environmental assessment and monitor (with the aim of minimizing) adverse ecological changes caused by inputs (e.g., pollution, disease) and their related economic and social consequences".

References

- RFM Standard V2.1
- Clauses 13.1 & 13.3; Sections 4, 5 & 13
- https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC-RFM-V2.1-StandardFINAL-Sept-2020_Final-1.pdf

D.3.08 Enhanced Fisheries

Additionally, the collection of data specific to enhanced components of the stock also falls within the requirements of the RFM Standard relating to achieving a robust scientific understanding of the entire fishery; for example those in Section 4, where the over-arching requirement is that "There shall be effective fishery data (dependent and independent) collection and analysis systems for stock management purposes"; and in Section 5, where the over-arching requirement is that "There shall be regular stock assessment activities appropriate for the fishery, its range, the species biology, and the ecosystem, undertaken in accordance with acknowledged scientific standards to support its optimum utilization."

D.4 ASSESSMENT METHODOLOGIES

D.4.01 Certified Stocks

GSSI Component	Guidance
The standard requires management decisions by the Designated Authority (D.1.01) to be based on an assessment of the current status and trends of the stock under consideration, using adequate, reliable and current data and/or other information. Other information may include generic evidence based on similar stocks, when specific information on the stock under consideration is not available, providing there is low risk to the stock under consideration in	<p>This is a partner Essential Component to D.3.01 which covers the collection and maintenance of the data to be used in the stock assessment referred to in this Essential Component. The purpose of the stock assessment is to contribute to the best scientific evidence available which is used by the fishery management organization or arrangement (D.1.03 – D.1.05) to establish management objectives for the stock under consideration (D.2), management measures (D.5) to meet those objectives and evidence regarding outcome status (D.6) – i.e. whether the objectives have been met.</p> <p>The Ecolabelling Guidelines provide additional guidance on the use of data in the stock assessment. Specifically, in the absence of specific information on the stock under consideration, generic evidence based on similar stocks can be used for fisheries with low risk to that stock under consideration. The language of the Essential Component aligns with this text, however, it raises a concern that this approach could be used inappropriately in cases where the risk to the stock under consideration is not "low". The greater the risk, the more specific evidence is necessary to assess sustainability. In principle, 'generic evidence based on similar stocks' should not suffice, but it may be adequate where there is low risk to the stock under consideration. In general, "Low risk to the stock under consideration" would suggest that there is very little chance of the stock becoming overfished, for example where the exploitation rate is very low and the resilience of the stock is high (see Essential Component D.4.03). However, the Standard should make it clear that the evidence for low risk and the justification for using surrogate data must come from the stock assessment itself.</p> <p>The aim of this Essential Component, in conjunction with Essential Component D.4.04, is to avoid the use of less elaborate methods of stock assessment automatically precluding fisheries from potential certification. Nevertheless, to the extent that the application of such methods results in greater uncertainty about the state of the stock under consideration, more precaution must be applied in managing fisheries on such stocks. This may, for example,</p>

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D.4.01 Certified Stocks

accordance with the Precautionary Approach.	necessitate lower levels of utilization of the resource than would be possible with lower levels of uncertainty, in accordance with the Essential Components covering the Precautionary Approach (D.1.06) and the Best Scientific Evidence Available (D.1.03 – D.1.05).
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Conclusion

The RFM Program is in alignment because the requirement for management decisions to be based on stock assessments and reliable and current data is incorporated throughout the RFM Standard. Clauses which are particularly relevant include:

Clause 1.2, "Management measures shall consider (1) stock status (i.e., overfished, biomass) and genetic diversity (stock structure) over its entire area of distribution, and (2) other biological characteristics of the fish stock (stock) including age of maturity and reproductive potential".

Clause 4.1.2, "In the absence of specific information on the stock under consideration, generic evidence based on similar stocks can be used. However, the greater the risk of overfishing, the more specific evidence is necessary to ascertain the sustainability of intensive fisheries".

Clause 5.1.2, "The fisheries management organization shall ensure that appropriate research is conducted into all aspects of fisheries including biology, ecology, technology, environmental science, economics, and fishery enhancement. Analysis results shall be distributed in a timely and readily understandable fashion in order that the best scientific evidence available contributes to fisheries conservation, management, and development. The fisheries management organization shall also ensure the availability of research facilities and provide appropriate training, staffing, and institution building to conduct the research".

Clause 8.1, "Conservation and management measures shall be designed to ensure the long-term sustainability of fishery resources at levels which promote optimum utilization, and are based on verifiable and objective scientific and/or traditional, fisher, or community sources".

References

- RFM Standard V2.1
- Clauses 1.2, 4.1.2, 5.1.2 & 8.1
- https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC-RFM-V2.1-StandardFINAL-Sept-2020_Final-1.pdf

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D.4.02 Certified Stocks

GSSI Component	Guidance
The standard requires that the assessment of the current status and trends of the stock under consideration considers total fishing mortality on that stock from all sources including discards, unobserved mortality, incidental mortality, unreported catches and catches in all fisheries over its entire area of distribution.	<p>This is a partner Essential Component to D.5.01. Management measures for the stock under consideration must be based on an assessment of that stock which takes account of all removals from the stock over its entire area of distribution, i.e. not just by the unit of certification but by all fisheries that utilize that stock, including bycatch, discards, unobserved mortality, incidental mortality, unreported catches, and catches taken outside of the unit of certification. Note that these terms are not defined here, or in the Glossary. They are used collectively in this context to cover all possible descriptions of fishery removals of the stock under consideration. See also Essential Component D.1.12 covering the effective and suitable monitoring, surveillance, control and enforcement of the fishery of which the unit of certification is a part.</p> <p>Area of Distribution is described in the Glossary based on a CITES reference for species, but in the context of fish and fisheries, this can be used for stocks.</p>
Conclusion	References
<p>The RFM Program is in alignment because the standard includes the following relevant clauses:</p> <p>Clause 1.2, "Management measures shall consider 1) the whole stock biological unit (i.e. structure and composition contributing to its resilience) over its entire area of distribution 2) the area through which the species migrates during its life cycle and 3) other biological characteristics of the stock."</p> <p>Clause 4.1, All significant fishery removals and mortality of the target species (shall be considered by management. Specifically, reliable and accurate data required for assessing the status of fishery(ies) and ecosystems—including data on retained catch, bycatch, discards, and waste— shall be collected. Data can include relevant traditional, fisher, or community knowledge, provided their validity can be objectively verified. These data shall be collected, at an appropriate time and level of aggregation, by relevant management organizations connected with the fishery, and provided to relevant States regional, and international fisheries organizations.</p>	<ul style="list-style-type: none"> • Responsible Fisheries Management Fisheries Standard Version 2.1 • Clauses 1.2, 4.1, 5.4 • https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC-RFM-V2.1-StandardFINAL-Sept-2020_Final-1.pdf

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D.4.02 Certified Stocks

Clause 5.4, The fishery management organizations shall directly, or in conjunction with other States, develop collaborative technical and research programs to improve understanding of the biology, environment, and status of transboundary shared, straddling, highly migratory and high seas stocks.

D.4.03 Certified Stocks

GSSI Component	Guidance
The standard requires that the assessment of the current status and trends of the stock under consideration takes into account the structure and composition of that stock which contribute to its resilience.	Resilience is described in the Glossary. Understanding the resilience of a stock (i.e. it's ability to recover from a disturbance) is an important part of assessing that stock's status and trends and contributes to an assessment of the level of risk to that stock (see Essential Component D.4.01).
Conclusion	References
<p>The RFM Program is in alignment because the standard includes the following relevant clauses:</p> <p>Clause 1.2, "Management measures shall consider 1) the whole stock biological unit (i.e. structure and composition contributing to its resilience) over its entire area of distribution 2) the area through which the species migrates during its life cycle and 3) other biological characteristics of the stock."</p> <p>Clause 5.1.2; The fisheries management organization shall ensure that appropriate research is conducted into all aspects of fisheries including biology, ecology, technology, environmental science, economics, and fishery enhancement. Analysis results shall be distributed in a timely and readily understandable fashion in order that the best scientific evidence available contributes to fisheries conservation, management, and development. The fisheries management organization shall also ensure the availability of research facilities and provide appropriate training, staffing, and institution building to conduct the research. Furthermore, the following clause requires some of the information listed above to be available to ensure effective enforcement activities.</p>	<ul style="list-style-type: none"> • Responsible Fisheries Management Fisheries Standard Version 2.1 • Clauses 1.2, 5.1.2, 5.2 • https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC-RFM-V2.1-StandardFINAL-Sept-2020_Final-1.pdf

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D.4.03 Certified Stocks

And Clause 5.2, "There shall be established research capacity necessary to assess and monitor 1) the effects of climate or environment change on fish stocks and aquatic ecosystems, 2) the state of the stock under State jurisdiction, and for 3) the impacts of ecosystem changes resulting from fishing pressure, pollution or habitat alteration."

D.4.04 Enhanced Fisheries

GSSI Component	Guidance
In the case of enhanced fisheries, the standard requires that the assessment of current status and trends of the stock under consideration includes an evaluation of whether there are significant negative impacts of enhancement activities on the naturally reproductive component of the stock under consideration.	<p>This Essential Component addresses the need for standards to require an assessment to support the achievement of management objectives specified in Essential Component D.2.05. It refers to Enhanced Fisheries, hence it may be regarded as not applicable if the Scheme/Standard explicitly excludes enhanced fisheries (see also Guidance for D.2.05) The term natural reproductive stock components is explained in the Glossary. The term "significant negative impacts" is used in the Inland Guidelines. This was not intended to be equivalent to severe adverse impacts (on dependent predators). The consultation that resulted in the drafting of the Inland Guidelines considered that avoidance of "severe adverse impacts" only would not be consistent with a management obligation to manage enhancement in ways that would not impact the productivity and abundance of the natural reproductive stock component of the stock under consideration.</p> <p>The Guidelines specifically require that naturally reproductive components of enhanced stocks are not substantially displaced by stocked components. In particular, displacement must not result in a reduction of the natural reproductive stock component below abundance-based target reference points (or their proxies). With respect to aquaculture production of organisms for stocking, there should be an advance evaluation of the effects of aquaculture development on genetic diversity and ecosystem integrity, based on the best scientific information available.</p>

D . 4 A S S E S S M E N T M E T H O D O L O G I E S

D.4.04 Enhanced Fisheries

Conclusion	References
<p>The RFM Program is in alignment because the standard includes the following relevant clauses:</p> <p>Clause 13.3, "Effective procedures specific to aquaculture of fisheries enhancement shall be established to undertake appropriate environmental assessment and monitoring with the aim of minimizing adverse ecological changes such as those caused by inputs (e.g. pollution, disease) from enhancement activities and related economic and social consequences".</p> <p>Clause 13.1.1 In the case of enhanced fisheries, the fishery management organization should take into account natural production, and shall take appropriate actions for conserving genetic diversity and biodiversity, protecting ETP species, maintaining aquatic ecosystems, minimizing adverse impacts on ecosystem structure and function, controlling disease, and maintaining the quality of enhanced stock. Enhanced fisheries may be supported in part by stocking organisms produced in aquaculture facilities or removed from wild stocks other than the stock under consideration. Aquaculture production for stocking purposes shall be managed and developed according to the above provisions.</p> <p>Clause 13.4, "With due regard to the assessment approach employed, stock assessment of fisheries that are enhanced through aquaculture inputs shall consider the separate contributions from aquaculture and natural production."</p> <p>Clause 13.7.1, "Efforts shall be undertaken to minimize the harmful effects of introducing non-native species or genetically altered stocks used for aquaculture including culture based fisheries into waters".</p> <p>Clause 13.7.2, "Steps shall be taken to minimize adverse genetic disease and other effects of escaped farmed fish on wild stocks".</p>	<ul style="list-style-type: none"> • Responsible Fisheries Management Fisheries Standard Version 2.1 • Clauses 13.3, 13.1.1, 13.4, 13.5.1, 13.5.2 • https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC-RFM-V2.1-StandardFINAL-Sept-2020_Final-1.pdf

D . 4 A S S E S S M E N T M E T H O D O L O G I E S

D.4.05 Enhanced Fisheries

GSSI Component	Guidance
In the case of fisheries that are enhanced through aquaculture inputs, the standard requires that the stock assessment of the stock under consideration must consider the separate contributions from aquaculture and natural production.	<p>This is a technical requirement applicable to stock assessments of fisheries that are enhanced through aquaculture inputs. If fisheries that are enhanced through aquaculture inputs are explicitly out of scope for the scheme, then this Essential Component is not applicable.</p> <p>The glossary entry for Enhanced Fisheries explains that enhancement may entail stocking with material originating from aquaculture installations, translocations from the wild and habitat modification. Accordingly, aquaculture inputs refers to any stocking with material originating from aquaculture installations.</p>
Conclusion	References
<p>The RFM Program is in alignment because the standard includes the following relevant clauses:</p> <p>Clause 13.3, "Effective procedures specific to aquaculture of fisheries enhancement shall be established to undertake appropriate environmental assessment and monitoring with the aim of minimizing adverse ecological changes such as those caused by inputs (e.g. pollution, disease) from enhancement activities and related economic and social consequences"</p> <p>Clause 13.4 With due regard to the assessment approach employed, stock assessment of fisheries that are enhanced through aquaculture inputs shall consider the separate contributions from aquaculture and natural production.</p> <p>Clause 13.1.1 In the case of enhanced fisheries, the fishery management organization should take into account natural production, and shall take appropriate actions for conserving genetic diversity and biodiversity, protecting ETP species, maintaining aquatic ecosystems, minimizing adverse impacts on ecosystem structure and function, controlling disease, and maintaining the quality of enhanced stock. Enhanced fisheries may be supported in part by stocking organisms produced in aquaculture facilities or removed from wild stocks other than the stock under consideration. Aquaculture production for stocking purposes shall be managed and</p>	<ul style="list-style-type: none"> • Responsible Fisheries Management Fisheries Standard Version 2.1 • Clauses 13.3, 13.4, 13.1.1, 13.7.1, 13.7.2 • https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC-RFM-V2.1-StandardFINAL-Sept-2020_Final-1.pdf

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developed according to the above provisions.

Clause 13.7.1, Efforts shall be undertaken to minimize the adverse impacts of introducing non-native species or genetically altered stocks used for aquaculture into waters.

Clause 13.7.2, Steps shall be taken to minimize adverse genetic, disease, and other effects of escaped farmed fish (aquaculture) on wild stocks.

D.4.06 Non-certified Catches

GSSI Component	Guidance
The standard requires an assessment of the extent to which catches and discards by the unit of certification of stocks other than the stock under consideration and any associated culture and enhancement activities threaten those stocks with recruitment overfishing or other impacts that are likely to be irreversible or very slowly reversible.	<p>This is the partner Essential Component of D.3.03 that requires the collection and maintenance of adequate, reliable and current data and/or other information on non-target catches and discards in the unit of certification. Non-target catches and discards refers to species/stocks that are taken by the unit of certification other than the stock for which certification is being sought (see Glossary).</p> <p>This Essential Component addresses the need for standards to require an assessment to support the achievement of management objectives specified in Essential Component D.2.06. This Essential Component is explicitly and deliberately confined to the effects of non-target catches and discards by the unit of certification on those non-target species/stocks. Cumulative effects on non-target species/stocks are not included in the Ecolabelling Guidelines. They are not part of the Essential Components, but they are covered in the Supplemental Components. The component relating to enhancement activity may be "not applicable" to schemes that explicitly do not cover enhanced fisheries. Non-target catches/stocks are described in the Glossary.</p> <p>Examples of irreversible or very slowly reversible effects on bycatch species include excessive depletion of very long-lived organisms (see Glossary).</p>

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D.4.06 Non-certified Catches

Conclusion	References
<p>The RFM Program is in alignment because the standard includes the following relevant clause:</p> <p>Clause 12.6, "Non target catches, including discards, of stocks other than the 'stock under consideration' shall be monitored and shall not threaten these non-target stocks with serious risk of extinction, recruitment overfishing or other impacts that are likely to be irreversible or very slowly reversible; if such impacts arise, effective remedial action shall be taken."</p>	<ul style="list-style-type: none"> • Responsible Fisheries Management Fisheries Standard Version 2.1 • Clause 12.6 • https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC-RFM-V2.1-StandardFINAL-Sept-2020_Final-1.pdf

D.4.07 Ecosystem Structure, Processes and Function

GSSI Component	Guidance
<p>The standard requires an analysis of the effects of the unit of certification, including any associated enhancement activities where applicable, on ecosystem structure, processes and function to</p>	<p>This is the partner Essential Component of D.3.02 that requires the collection and maintenance of adequate, reliable and current data and/or other information about the effects of the unit of certification, including any enhancement activities, on ecosystem structure, processes and function. The component relating to enhancement activity may be "not applicable" to schemes that explicitly do not cover enhanced fisheries. Ecosystem structure, processes and function are described in the Glossary. This language is in accordance with Section 4.1.4.1 of the FAO Ecosystem Approach to Fisheries, which suggests one of the broad management objectives for fisheries could be to keep impact on the structure, processes and functions of the ecosystem at an acceptable level.</p> <p>This requirement is about the analysis of these data to develop the best scientific evidence available regarding the ecosystem effects of fishing, which is used by the fishery management organization or arrangement (D.1.03 – D.1.05) to establish management objectives (D.2) and management measures (D.5) to meet those objectives.</p> <p>The data and analysis may include local, traditional or indigenous knowledge and research, providing its validity can be objectively verified.</p>

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D.4.07 Ecosystem Structure, Processes and Function

develop timely scientific advice on the likelihood and magnitude of impacts.

As expressed in the Guidance relating to the Essential Component on the precautionary approach (D.1.06), much greater scientific uncertainty is to be expected in assessing possible adverse ecosystem impacts of fisheries than in assessing the state of target stocks. This issue can be addressed by taking a risk assessment/risk management approach. Note that some ecosystem impacts such as those on bycatch species are often more readily quantifiable than others, such as those on habitat. While a risk assessment approach may mitigate a lack of quantitative information, the management system must still ensure adequate mitigation of adverse impacts.

Conclusion

The RFM Program is in alignment because the standard includes the following relevant clauses:

3.2 Management measures shall provide, inter alia, that:

3.2.1 Excess fishing capacity shall be avoided and exploitation of the stocks shall remain economically viable.

3.2.2 The economic conditions under which fishing industries operate shall promote responsible fisheries.

3.2.3 The interests of fishers, including those engaged in subsistence, small-scale, and artisanal fisheries shall be taken into account.

3.2.4 Biodiversity of aquatic ecosystems shall be conserved and ETP species shall be protected.

Where relevant, there shall be pertinent objectives, and as necessary, management measures.

Clause 4.1, All significant fishery removals and mortality of the target species (shall be considered by management. Specifically, reliable and accurate data required for assessing the status of fishery(ies) and ecosystems—including data on retained catch, bycatch, discards, and waste— shall be collected. Data can include relevant traditional, fisher, or community knowledge, provided their validity can be objectively verified. These data shall be collected, at an appropriate time and level of aggregation, by relevant management organizations connected with the fishery, and provided to relevant States regional, and international fisheries organizations.

References

- Responsible Fisheries Management Fisheries Standard Version 2.1
- Clauses 3.2.2 and all subclauses,
- 4.1, 4.1.1, 12.2, 13.1
- https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC-RFM-V2.1-StandardFINAL-Sept-2020_Final-1.pdf

D.4.07 Ecosystem Structure, Processes and Function

Clause 4.1.1, “Timely, complete and reliable statistics shall be compiled on catch and fishing effort and maintained in accordance with applicable international standards and practices and in sufficient detail to allow sound statistical analysis for stock assessment. Such data shall be updated regularly and verified through an appropriate system. The use of research results as a basis for the setting of management objectives, reference points and performance criteria, as well as for ensuring adequate linkage, between applied research and fisheries management (e.g. adoption of scientific advice) shall be promoted. Results of analysis shall be distributed accordingly as a contribution to fisheries conservation, management and development.”

12.2, The most probable adverse impacts from human activities, including fishery effects on the ecosystem/environment, shall be assessed and, where appropriate, addressed and or/corrected, taking into account available scientific information and local knowledge. This may take the form of an immediate management response or a further analysis of the identified risk. In this context, full consideration should be given to the special circumstances and requirements in developing fisheries, including financial and technical assistance, technology transfer, training, and scientific cooperation. In the absence of specific information on the ecosystem impacts of fishing on the unit of certification, generic evidence based on similar fishery situations can be used for fisheries with low risk of severe adverse impact. However, the greater the risk, the more specific evidence shall be necessary to ascertain the adequacy of mitigation measures.

Clause 13.1, The fishery management organization shall promote responsible development and management of fisheries enhancement, including an advanced evaluation of the effects of fisheries enhancement on genetic diversity and ecosystem integrity, based on the best scientific evidence available and/or verifiable and objective traditional, fisher, or community knowledge. Significant uncertainty is to be expected in assessing possible adverse ecosystem impacts of fisheries, including culture and enhancement activities. This issue can be addressed by taking a risk assessment/risk management approach.

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D.4.08 Habitat		
GSSI Component	Guidance	
<p>The standard requires an assessment of the impacts of the unit of certification, including any associated enhancement activities where applicable, on essential habitats for the stock under consideration and on habitats that are highly vulnerable to damage by the fishing gear of the unit of certification. The assessment should consider the full spatial range of the relevant habitat, not just that part of the spatial range that is potentially affected by fishing.</p>	<p>This is the partner Essential Component of D.3.05 that requires knowledge within the fishery management system of the essential habitats for the stock under consideration and habitats that are highly vulnerable to damage by the fishing gear of the unit of certification. Under this Essential Component the standard must require an assessment of the impacts of the unit of certification on these habitats. The component relating to enhancement activity may be "not applicable" to schemes that explicitly do not cover enhanced fisheries. The results of the assessment should provide sufficient understanding of the relevant habitats and fishery impacts on them to enable those impacts to be avoided, minimized or mitigated; i.e. for the management objective with respect to habitat (D.2.06) to be achieved. The achievement of this Essential Component should be considered alongside D.3.05 and D.6.07. In particular, the FAO Ecolabelling Guidelines acknowledge the importance of a "risk assessment/risk management approach" to address the issue of greater scientific uncertainty; also that the most probable adverse impacts should be considered, taking into account available scientific information, and traditional, fisher or community knowledge provided that its validity can be objectively verified.</p>	
Conclusion	References	
<p>The RFM Program is in alignment because the standard includes the following relevant clauses: Clause 5.2, "There shall be established research capacity necessary to assess and monitor 1) the effects of climate or environment change on fish stocks and aquatic ecosystems, 2) the state of the stock under State jurisdiction, and for 3) the impacts of ecosystem changes resulting from fishing pressure, pollution or habitat alteration."</p> <p>Clause 6.5 Measures shall be introduced to identify and protect depleted stocks and those stocks threatened with depletion, and to facilitate the sustained recovery/restoration of such stocks. Also, efforts shall be made to ensure that resources and habitats critical to the well-being of such stocks, which have received adverse impacts by fishing or other human activities, are restored.</p>	<ul style="list-style-type: none"> • Responsible Fisheries Management Fisheries Standard Version 2.1 • Clauses 5.2, 6.5, 12.2.7 • https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC-RFM-V2.1-StandardFINAL-Sept-2020_Final-1.pdf 	

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D.4.08 Habitat

Clause 12.2.7 There shall be knowledge of the essential habitats for the stock under consideration and potential fishery impacts on them. Impacts on essential habitats, and on habitats that are highly vulnerable to damage by the fishing gear involved, shall be avoided, minimized, or mitigated. In assessing fishery impacts, the full spatial range of the relevant habitat shall be considered, not just the part of the spatial range that is potentially affected by fishing.

D.4.09 Dependent Predators

GSSI Component	Guidance
The standard requires that data and information on the role of the stock under consideration in the food-web are assessed to determine whether it is a key prey species in the ecosystem, and if so whether fishing on that stock might result in severe adverse impacts on dependent predators.	The purpose of assessing the data and information is to provide adequate knowledge of the role of the stock under consideration in the food-web. Adequate knowledge means there is enough understanding of the role of the stock under consideration in the food-web to determine whether it is a key prey species and, if so, whether fishing on that stock under consideration might result in severe adverse impacts on dependent predators.
Conclusion	References
<p>The RFM Program is in alignment because the standard includes the following relevant clauses:</p> <p>Clause 4.1, All significant fishery removals and mortality of the target species (shall be considered by management. Specifically, reliable and accurate data required for assessing the status of fishery(ies) and ecosystems—including data on retained catch, bycatch, discards, and waste— shall be collected. Data can include relevant traditional, fisher, or community knowledge, provided their validity can be objectively verified. These data shall be collected, at an appropriate time and level of aggregation, by relevant management organizations connected with the fishery, and provided to relevant States regional, and international fisheries organizations.</p>	<ul style="list-style-type: none"> • Guidance for V2 and v2.1 • https://rfmcertification.org/wp-content/uploads/2021/06/AK-RFM-V2.0-GuidanceFINAL-May-2018-New-Seal-Oct2019.pdf • Responsible Fisheries Management Fisheries Standard Version 2.1 • Clauses 4.1, 4.1.1, 5.2, 12.7 • https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC-

D.4.09 Dependent Predators

Clause 4.1.1, "Timely, complete and reliable statistics shall be compiled on catch and fishing effort and maintained in accordance with applicable international standards and practices and in sufficient detail to allow sound statistical analysis for stock assessment. Such data shall be updated regularly and verified through an appropriate system. The use of research results as a basis for the setting of management objectives, reference points and performance criteria, as well as for ensuring adequate linkage, between applied research and fisheries management (e.g. adoption of scientific advice) shall be promoted. Results of analysis shall be distributed accordingly as a contribution to fisheries conservation, management and development."

Clause 5.2, "There shall be established research capacity necessary to assess and monitor 1) the effects of climate or environment change on fish stocks and aquatic ecosystems, 2) the state of the stock under State jurisdiction, and for 3) the impacts of ecosystem changes resulting from fishing pressure, pollution or habitat alteration."

12.3 The role of the stock under consideration in the food web shall be considered, and if it is a key prey species(2) in the ecosystem, management objectives and measures shall be in place to avoid severe adverse impacts on dependent predators.

12.4 There shall be outcome indicator(s) consistent with achieving management objectives seeking to avoid severe adverse impacts on dependent predators resulting from the unit of certification fishing on a stock under consideration that is a key prey species.

V2. Guidance (clause 12.3) now clause Process: There is a mechanism in place by which the role of the stock under consideration in the food web is assessed and monitored, and its relative importance as a prey species is determined. If the species is considered by the fisheries management organization to be an important prey species, there shall be specific management objectives relating to minimizing the impacts of the fishery on dependent predators. The FAO Guidelines require that all sources of fishing mortality on the stock under consideration are taken into

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D.4.09 Dependent Predators

account (whether or not it is a prey species) in assessing the state of the stock under consideration, including discards, unobserved mortality, incidental mortality, unreported catches, and catches in other fisheries.

13.2 The fishery management organization shall produce and regularly update fishery enhancement development strategies and plans, as required, to ensure that fishery enhancement development is ecologically sustainable and to allow the rational use of resources shared by enhancement and other activities.

D.4.10 Endangered Species

GSSI Component	Guidance
The standard requires an assessment of the impacts of the unit of certification, including any associated enhancement activities where applicable, on endangered species.	<p>This is the partner Essential Component of D.3.04 that requires the collection and maintenance of adequate, reliable and current data and/or other information about the effects of the unit of certification, including any enhancement activities, on endangered species. Under this Essential Component the standard must require an assessment of the impacts of the unit of certification on these species. The component relating to enhancement activity may be "not applicable" to schemes that explicitly do not cover enhanced fisheries. The results of the assessment should provide sufficient understanding of the relevant endangered species and fishery impacts on them to enable their protection from those impacts, i.e., for the management objective with respect to endangered species (D.2.05) to be achieved.</p> <p>The achievement of this Essential Component should be considered alongside D.3.04 and D.6.06. In particular, the FAO Guidelines acknowledge the importance of a "risk assessment/risk management approach" to address the issue of greater scientific uncertainty associated with ecosystem impacts; also that the most probable adverse impacts should be considered, taking into account available scientific information, and traditional, fisher or community knowledge provided that its validity can be objectively verified.</p>

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D.4.10 Endangered Species

Conclusion	References
<p>The RFM Program is in alignment because the standard includes the following relevant clauses:</p> <p>3.2.4 Biodiversity of aquatic ecosystems shall be conserved and ETP species shall be protected. Where relevant, there shall be pertinent objectives, and as necessary, management measures.</p> <p>Clause 8.5.1: Appropriate measures shall be applied to minimize catch, waste, and discards of non-target species (both fish and non-fish species), and impacts on associated, dependent, or endangered species.</p> <p>Clause 12.6 “shall not threaten these non-target stocks with serious risk of extinction, recruitment overfishing or other impacts that are likely to be irreversible or very slowly reversible; if such impacts arise, effective remedial action shall be taken.”</p> <p>12.2.10 There shall be outcome indicator(s) consistent with achieving management objectives seeking to minimize adverse impacts of the unit of certification (including any fishery enhanced activities) on the structure, processes, and function of aquatic ecosystems that are likely to be irreversible or very slowly reversible. Any modifications to the habitat for enhancing the stock under consideration must be reversible and not cause serious or irreversible harm to the natural ecosystem’s structure, processes, and function. FAO Eco (2011) 36.9, 41</p> <p>13.1 The fishery management organization shall promote responsible development and management of fisheries enhancement, including an advanced evaluation of the effects of fisheries enhancement on genetic diversity and ecosystem integrity, based on the best scientific evidence available and/or verifiable and objective traditional, fisher, or community knowledge. Significant uncertainty is to be expected in assessing possible adverse ecosystem impacts of fisheries, including culture and enhancement activities. This issue can be addressed by taking a risk assessment/risk management approach.</p>	<ul style="list-style-type: none"> • Alaska salmon reassessment • Responsible Fisheries Management Fisheries Standard Version 2.1 <ul style="list-style-type: none"> • Clauses 3.2.4, 8.5.1, 12.6 • https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC-RFM-V2.1-StandardFINAL-Sept-2020_Final-1.pdf

D.4.10 Endangered Species

FAO CCRF (1995) 9.1.2, FAO Eco (2011) 41

13.1.1 In the case of enhanced fisheries, the fishery management organization should take into account natural production, and shall take appropriate actions for conserving genetic diversity and biodiversity, protecting ETP species, maintaining aquatic ecosystems, minimizing adverse impacts on ecosystem structure and function, controlling disease, and maintaining the quality of enhanced stock. Enhanced fisheries may be supported in part by stocking organisms produced in aquaculture facilities or removed from wild stocks other than the stock under consideration. Aquaculture production for stocking purposes shall be managed and developed according to the above provisions.

13.2 The fishery management organization shall produce and regularly update fishery enhancement development strategies and plans, as required, to ensure that fishery enhancement development is ecologically sustainable and to allow the rational use of resources shared by enhancement and other activities.

13.2.1 The fishery management organization shall ensure that the livelihoods of local communities, and their access to fishing grounds, are not negatively affected by enhanced fisheries developments.

13.3. 3 Effective procedures specific to fisheries enhancement activities shall be established to undertake appropriate environmental assessment and monitor (with the aim of minimizing) adverse ecological changes caused by inputs (e.g., pollution, disease) and their related economic and social consequences.

Alaska Salmon Fishery Certification Report provided as an example

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D.4.1I Small Scale and/or Data Limited Fisheries

GSSI Component	Guidance
The standard does not preclude small scale fisheries from possible certification for ecolabelling due to the use of less elaborate methods of stock assessment.	This Essential Component derives from paragraph 32 of the Marine Ecolabelling Guidelines. Specifically, that paragraph deals with the ways in which certification standards address the use of less elaborate methods of stock assessment in small scale fisheries, noting that with higher uncertainty more precautionary approaches to managing fisheries on such resources will be required which may necessitate lower levels of utilization of the resource.
Conclusion	References
The RFM Program is in alignment because it recognizes the frequency with which less elaborate methods of stock assessment are used by small-scale fisheries and does not preclude fisheries which use such methods from certification. This is exemplified by Clause 5.1.1 of the RFM Standard which states, "Less elaborate stock assessment methods are frequently used for small-scale or low-value capture fisheries resulting in greater uncertainty about the status of the stock under consideration. A more precautionary approach to managing fisheries on such resources shall be required, including, where appropriate, a lower level of resource utilization. A record of good management performance may be considered as supporting evidence of the adequacy of the management system"	<ul style="list-style-type: none"> • RFM Standard V2.1 • Clause 5.1.1 • https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC-RFM-V2.1-StandardFINAL-Sept-2020_Final-1.pdf

D.5 MANAGEMENT MEASURES

D.5.01 Certified Stocks		
GSSI Component	Guidance	
The standard requires that management measures for the stock under consideration consider the impacts on the stock under consideration of all the fisheries utilizing that stock under consideration over its entire area of distribution.	<p>This Essential Component addresses cumulative impacts of fishing mortality from all sources on the stock under consideration as specified in the Ecolabelling Guidelines. Management measures for the stock under consideration must be based on an assessment of that stock which takes account of all removals from the stock over its entire area of distribution, i.e. not just by the unit of certification but by all fisheries that utilize that stock and all other sources of fishing mortality, including (but not limited to) bycatch, discards, unobserved mortality, incidental mortality, unreported catches, recreational fisheries, catches taken for research purposes and catches taken outside of the unit of certification. These terms are not defined here, or in the Glossary. They are used collectively in this context to cover all possible descriptions of fishery removals of the stock under consideration.</p> <p>Area of Distribution is described in the Glossary based on a CITES reference for species, but this can apply to stocks in a fisheries context.</p>	
Conclusion	References	
<p>The RFM Program is in alignment because this component is met by a combination of Clause 1.2, which states: "Management measures shall consider 1) the whole stock biological unit (i.e. structure and composition contributing to its resilience) over its entire area of distribution 2) the area through which the species migrates during its life cycle and 3) other biological characteristics of the stock.", and</p> <p>Clause 4.1, All significant fishery removals and mortality of the target species (shall be considered by management. Specifically, reliable and accurate data required for assessing the status of fishery(ies) and ecosystems—including data on retained catch, bycatch, discards, and waste— shall be collected. Data can include relevant traditional, fisher, or community knowledge, provided their</p>	<ul style="list-style-type: none"> • Responsible Fisheries Management Fisheries Standard Version 2.1 • Clauses 1.2, 4.1 • https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC-RFM-V2.1-StandardFINAL-Sept-2020_Final-1.pdf 	

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D.5.01 Certified Stocks

validity can be objectively verified. These data shall be collected, at an appropriate time and level of aggregation, by relevant management organizations connected with the fishery, and provided to relevant States regional, and international fisheries organizations.

D.5.02 Certified Stocks

GSSI Component	Guidance
The standard requires that management measures specify the actions to be taken in the event that the status of the stock under consideration drops below levels consistent with achieving management objectives, that allow for the restoration of the stock to such levels within a reasonable time frame. This requirement also pertains to species introductions or translocations that have occurred historically and which have become established as part of the natural ecosystem.	This requires the specification in advance of decision rules that mandate remedial management actions to be taken if target reference points are exceeded and/or limit reference points are approached or exceeded or the desired directions in key indicators of stock status are not achieved. For example, decreasing fishing mortality (or its proxy) if the stock size approaches its limit reference point. This is a central component of the Precautionary Approach (see D.1.06).
Conclusion	References
<p>The RFM Program is in alignment because the advance formulation of measures to be taken in the event of the stock dropping below sustainable levels is made an explicit requirement by Clause 6.4 which states:</p> <p>Management actions shall be agreed to in the eventuality that data sources and analyses indicate that these reference points have been exceeded. Accordingly, contingency plans shall be agreed in advance to allow an appropriate management response to serious threats to the resource as a result of overfishing, adverse environmental changes, or other phenomena that may have adverse e on impacts on the fishery resource (Appendix 1, Part 2). Such measures may be temporary and shall be based on best scientific evidence available.</p>	<ul style="list-style-type: none"> Responsible Fisheries Management Fisheries Standard Version 2.1 Clause 6.4 https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC-RFM-V2.1-StandardFINAL-Sept-2020_Final-1.pdf

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D.5.02 Certified Stocks

The guidance for Clause 6.4 makes clear that the standard not only requires the existence of pre-agreed processes or management measures, but also evidence that they have been applied if the stock has fallen outside acceptable levels.

D.5.03 Enhanced Fisheries

GSSI Component	Guidance
The standard requires, in the case of enhanced fisheries, management measures designed to achieve management objectives (see D.2.05) seeking to avoid significant negative impacts of enhancement activities on the natural reproductive stock components of the stock under consideration and any other wild stocks from which the organisms	<p>This Essential Component addresses the need for standards to require management measures to achieve the management objectives in Essential Component D.2.05. It refers to Enhanced Fisheries, hence it may be regarded as not applicable if the Scheme/Standard explicitly excludes enhanced fisheries (see also Guidance for D.2.05). The term natural reproductive stock components is explained in the Glossary. The term "significant negative impacts" is used in the Inland Guidelines. This was not intended to be equivalent to severe adverse impacts (on dependent predators). The consultation that resulted in the drafting of the Inland Guidelines considered that avoidance of "severe adverse impacts" only would not be consistent with a management obligation to manage enhancement in ways that would not impact the productivity and abundance of the natural reproductive stock component of the stock under consideration.</p> <p>In the case where organisms for stocking originate from wild stocks other than the stock under consideration, those stocks should be managed according to the provisions of Article 7 of the CCRF. In particular, those stocks should be within biologically based limits, or if outside those limits, the removal of organisms for stocking purposes does not hinder recovery and rebuilding of those stocks</p> <p>Standards that apply to enhanced components of the stock under consideration require that stocking of enhanced fisheries, whether sourced from aquaculture facilities or wild stocks, is undertaken in such a way as to maintain inter alia:</p> <ul style="list-style-type: none"> i) The integrity of the environment; ii) The conservation of genetic diversity; iii) Disease control; and

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D.5.03 Enhanced Fisheries

for stocking are being removed.

- iv) Quality of stocking material
- v) The donor wild stocks

Conclusion

The RFM Program is in alignment because the standard requires in Clauses 13.5 and 13.6

Clause 13.5 Regarding the enhanced components of the stock under consideration, when a natural reproductive stock component is maintained and fishery production is based primarily on natural biological production within the ecosystem of which the stock under consideration forms a part, enhanced fisheries shall meet the following criteria: (1) the species shall be native to the fishery's geographic area or introduced historically and have subsequently become established as part of the natural ecosystem, (2) there shall be natural reproductive components of the stock under consideration, and (3) the growth during the post-release phase shall be based upon food supply from the natural environment and the production system shall operate without supplemental feeding.

Clause 13.6 specifies "In the case of enhanced fisheries, the stock under consideration may comprise naturally reproductive components and components maintained by released from an enhancement facility. To avoid significant negative impacts of fishery enhancement activities on the natural reproductive components of the stock under consideration, the following shall apply: (1) naturally reproductive components of enhanced stocks shall not be overfished, and (2) naturally reproductive components of the stock under consideration shall not be displaced by enhanced components, and (3) in particular, displacement shall not result in a reduction of the stock under consideration below abundance-based target reference points (or their proxies) defined for the regulation of harvest."

References

- Responsible Fisheries Management Fisheries Standard Version 2.1
- Clauses 13.5, 13.6,
- https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC-RFM-V2.1-StandardFINAL-Sept-2020_Final-1.pdf

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D.5.04 Non-certified Catches

GSSI Component	Guidance
The standard requires that management measures are designed to achieve management objectives (see D.2.04) seeking to ensure that catches and discards by the unit of certification of stocks other than the stock under consideration and any associated culture and enhancement activity do not threaten those stocks with recruitment overfishing or other impacts that are likely to be irreversible or very slowly reversible.	This is the partner Essential Component of D.2.04. Non-target catches and discards refers to species/stocks that are taken by the unit of certification other than the stock for which certification is being sought (see Glossary). Examples of irreversible or very slowly reversible effects on bycatch species include recruitment overfishing or excessive depletion of very long-lived organisms. Management measures should mitigate effects that are likely to be irreversible or very slowly reversible by making those effects less severe such that they are no longer likely to be irreversible or very slowly reversible.
Conclusion	References
<p>The RFM Program is in alignment because the standard requires in</p> <p>Clause 8.5.1: Appropriate measures shall be applied to minimize catch, waste, and discards of non-target species (both fish and non-fish species), and impacts on associated, dependent, or endangered species.</p> <p>The guidance for the clause clarifies that these measures must be "considered effective" for the fishery to score a high conformance rating. Additionally, Clause 12.6 states "Non target catches, including discards, of stocks other than the 'stock under consideration' shall be monitored and shall not threaten these non-target stocks with serious risk of extinction; if serious risks of extinction arise, effective remedial action shall be taken".</p> <p>Also relevant is Clause 12.2.3 There shall be outcome indicator(s) consistent with achieving management objectives for non-target species (i.e., avoiding overfishing and other impacts that are likely to be irreversible or very slowly reversible).</p>	<ul style="list-style-type: none"> • Guidance to Performance Evaluation for the Certification of Wild Capture and Enhanced Fisheries in North America V2.1 • Clauses 12.5, 12.11 • https://rfmcertification.org/wp-content/uploads/2021/06/AK-RFM-V2.1-GuidanceDraft-Jan-2021_Final.pdf • Responsible Fisheries Management Fisheries Standard Version 2.1 • Clauses 8.5.1, 12.6, 12.2.3, Section 12 • https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC-RFM-V2.1-StandardFINAL-Sept-2020_Final-1.pdf

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D.5.05 Non-certified Catches

GSSI Component	Guidance	
The standard requires the existence of management measures that minimize unwanted catch and discards, where appropriate, and reduce post-released mortality where incidental catch is unavoidable.	<p>This Essential Component is related to D.5.04 in that minimizing unwanted catch and discards and reducing post-released mortality can help to reduce the impact of non-certified catches and discards by the unit of certification. Under the CCRF, users of aquatic ecosystems should minimize waste and catch of non-target species, both fish and non-fish species. Non-certified catches and discards refers to species/stocks that are taken by the unit of certification other than the stock for which certification is being sought (see Glossary).</p> <p>The words “where appropriate” give a scheme the flexibility not to require a fishery to have bycatch avoidance if there is no risk of bycatch in the fishery.</p>	
Conclusion	References	
<p>The RFM Program is in alignment because, although measures relating to the monitoring and minimization of discarding are present throughout the standard, the key relevant Clause is</p> <p>Clause 8.5.1: Appropriate measures shall be applied to minimize catch, waste, and discards of non-target species (both fish and non-fish species), and impacts on associated, dependent, or endangered species.</p> <p>The guidance expands upon this, noting that such measures must be considered effective for the fishery to be awarded a high conformance rating.</p> <p>Other relevant clauses include</p> <p>Clause 4.1, All significant fishery removals and mortality of the target species (shall be considered by management. Specifically, reliable and accurate data required for assessing the status of fishery(ies) and ecosystems—including data on retained catch, bycatch, discards, and waste— shall be collected. Data can include relevant traditional, fisher, or community knowledge, provided their</p>	<ul style="list-style-type: none"> Guidance to Performance Evaluation for the Certification of Wild Capture and Enhanced Fisheries in North America V2.1 Clause 8.5.1 https://rfmcertification.org/wp-content/uploads/2021/06/AK-RFM-V2.1-GuidanceDraft-Jan-2021_Final.pdf Responsible Fisheries Management Fisheries Standard Version 2.1 Clauses 8.5.1, 4.1, 8.8 https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC- 	

D . 5 M A N A G E M E N T M E A S U R E S

D.5.05 Non-certified Catches

validity can be objectively verified. These data shall be collected, at an appropriate time and level of aggregation, by relevant management organizations connected with the fishery, and provided to relevant States regional, and international fisheries organizations.

Clause 8.8, "States and relevant groups from the fishing industry shall measure performance and encourage the development, implementation and use of selective, environmentally safe and cost effective gear, technologies and techniques that sufficiently selective as to minimize catch, waste and discards of non-target species – both fish and non-fish species and impacts on associated or dependent species. The use of fishing gear and practices that lead to the discarding of catch shall be discouraged and the use of fishing gear and practices that increase survival rates of escaping fish shall be promoted. Inconsistent methods, practices and gears shall be phased out accordingly."

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D.5.06 Endangered Species

GSSI Component	Guidance
The standard requires the existence of management measures, as necessary, designed to achieve the management objectives (D.2.06) that seek to ensure that endangered species are protected from adverse impacts resulting from interactions with the unit of certification and any associated culture or enhancement activity, including recruitment overfishing or other	The context of this Essential Component is Endangered Species. Endangered species are defined in the Glossary. These species are already adversely impacted at the population level, by definition, and are susceptible to further adverse impacts at this level from which they need to be protected. Where "adverse impacts" is used in relation to Endangered Species in the FAO Guidelines there is no further qualification provided (i.e. no "significant" or "severe"). Elsewhere in the Guidelines, the term "adverse impacts" is qualified, but in each case this is in a very specific context. For example. the term "significant negative impacts" is used in the FAO Ecolabelling Guidelines only in relation to enhanced fisheries and "severe adverse impacts" is used only in relation to dependent predators. The term "significant adverse impacts" occurs only in the Deep Sea Guidelines with respect to VMEs.

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D.5.06 Endangered Species

impacts that are likely to be irreversible or very slowly reversible.

The FAO Guidelines acknowledge that much greater scientific uncertainty is to be expected in assessing possible adverse ecosystem impacts of fisheries than in assessing the state of target stocks (paragraph 31 (41)), hence the management measures to meet the objectives to protect endangered species should take into account risk and uncertainty.

Conclusion

The RFM Program is in alignment because the standard requires in

Clause 3.2.4 Biodiversity of aquatic ecosystems shall be conserved and ETP species shall be protected. Where relevant, there shall be pertinent objectives, and as necessary, management measures.

Clause 8.5.1: Appropriate measures shall be applied to minimize catch, waste, and discards of non-target species (both fish and non-fish species), and impacts on associated, dependent, or endangered species.

Clause 12.12: "There shall be outcome indicator(s) consistent with achieving management objectives that seek to ensure that endangered species are protected from adverse impacts resulting from interactions with the unit of certification and any associated culture or enhancement activity, including recruitment overfishing or other impacts that are likely to be irreversible or very slowly reversible."

Clause 13.5.3: "Research shall be promoted to develop culture techniques for endangered species to protect, rehabilitate and enhance their stocks, taking into account the critical need to conserve genetic diversity of endangered species".

References

- Responsible Fisheries Management Fisheries Standard Version 2.1
- Clauses 3.2.4, 8.5.1, 12.12, 13.5.3
- https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC-RFM-V2.1-StandardFINAL-Sept-2020_Final-1.pdf

D . 5 M A N A G E M E N T M E A S U R E S

D.5.07 Habitat

GSSI Component	Guidance
<p>The standard requires the existence of management measures, as necessary, designed to achieve the management objectives (D.2.06) seeking to avoid, minimize or mitigate impacts of the unit of certification on essential habitats for the “stock under consideration” and on habitats that are highly vulnerable to damage by the fishing gear of the unit of certification. In assessing fishery impacts, the Standard requires consideration of the full spatial range of the relevant habitat, not just that part of the spatial range that is potentially affected by fishing.</p>	<p>Essential habitats are described in the Glossary. There is no reason to regard them as being significantly different from the “critical fisheries habitats in marine and fresh water ecosystems” referred to in the CCRF (Article 6.8), which include wetlands, mangroves, reefs, lagoons, nursery and spawning areas. Examples of impacts on habitat that should be avoided include those listed in this paragraph: destruction, degradation, pollution and other significant impacts. The purpose of the requirement to consider the full spatial range of the relevant habitat in assessing fishery impacts may be to consider both the degree to which the habitat is rare, or common, and also that there may be impacts on the same habitat in other parts of its spatial range.</p>
Conclusion	References
<p>The RFM Program is in alignment because the standard includes the following relevant clauses:</p> <p>Clause 8.1 provides that:</p> <p>Conservation and management measures shall be designed to ensure the long-term sustainability of fishery resources at levels which promote optimum utilization and are based on verifiable and objective scientific and/or traditional, fisher, or community sources.</p> <p>Clause 8.5; Technical measures regarding the stock under consideration shall be taken into account, where appropriate, in relation to fish size, mesh size, gear, closed seasons or areas, areas reserved for particular (e.g., artisanal fisheries), and protection of juveniles or spawners.</p> <p>Clause 12.2.7; There shall be knowledge of the essential habitats for the stock under consideration and potential fishery impacts on them. Impacts on essential habitats, and on habitats that are highly vulnerable to damage by the fishing gear involved, shall be avoided, minimized, or mitigated. In assessing fishery impacts, the full spatial range of the relevant habitat shall be considered, not just the part of the spatial range that is potentially affected by fishing.</p>	<ul style="list-style-type: none"> • Responsible Fisheries Management Fisheries Standard Version 2.1 • Clauses 8.1, 8.5, 12.2.7 • https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC-RFM-V2.1-StandardFINAL-Sept-2020_Final-1.pdf

D . 5 M A N A G E M E N T M E A S U R E S

D.5.08 Dependent Predators

GSSI Component	Guidance
The standard requires the existence of management measures, as necessary, designed to meet the objectives (D.2.07) that seek to avoid severe adverse impacts on dependent predators resulting from fishing on a stock under consideration that is a key prey species.	This is the partner Essential Component of D.2.07. Where the stock under consideration is a key prey species, the standard must require that fishing mortality on that species/stock is managed so as not to result in severe adverse impacts on Dependent Predators. The FAO Guidelines require that all sources of fishing mortality on the stock under consideration are taken into account (whether or not it is a prey species) in assessing the state of the stock under consideration, including discards, unobserved mortality, incidental mortality, unreported catches and catches in other fisheries. Severe adverse impacts are mentioned in the Essential Components only in relation to dependent predators. This is in line with the Ecolabelling Guidelines. The severity of adverse impacts is related to their potential reversibility. Severe adverse impacts can be regarded as those that are likely to be irreversible or very slowly reversible, which is described in the Glossary.
Conclusion	References
<p>The RFM Program is in alignment because the indirect impacts of fishery removals on dependent species is considered throughout Section 12 of the Standard.</p> <p>Also relevant is Clause 12.2</p> <p>The most probable adverse impacts from human activities, including fishery effects on the ecosystem/environment, shall be assessed and, where appropriate, addressed and or/corrected, taking into account available scientific information and local knowledge. This may take the form of an immediate management response or a further analysis of the identified risk. In this context, full consideration should be given to the special circumstances and requirements in developing fisheries, including financial and technical assistance,</p>	<ul style="list-style-type: none"> • Alaska rockfish report • Guidance to Performance Evaluation for the Certification of Wild Capture and Enhanced Fisheries in North America V2.1 • Clause 12.7 • https://rfmcertification.org/wp-content/uploads/2021/06/AK-RFM-V2.1-GuidanceDraft-Jan-2021_Final.pdf • Responsible Fisheries Management Fisheries Standard Version 2.1

D . 5 M A N A G E M E N T M E A S U R E S

D.5.08 Dependent Predators

technology transfer, training, and scientific cooperation. In the absence of specific information on the ecosystem impacts of fishing on the unit of certification, generic evidence based on similar fishery situations can be used for fisheries with low risk of severe adverse impact.

However, the greater the risk, the more specific evidence shall be necessary to ascertain the adequacy of mitigation measures.

Supplementary clauses which require the existence of management measures to protect dependent species include

Clause 12.1, The fishery management organization shall assess the impacts of environmental factors on target stocks and associated or dependent species in the same ecosystem, and the relationship among the populations in the ecosystem.

7.1.1 In implementing the PA, the fishery management organization shall take into account, inter alia, uncertainties relating to the size and productivity of the stocks, reference points, stock condition in relation to such reference points, levels and distribution of fishing mortality, the impact of fishing activities (including discards) on non-target and associated or dependent predators, and environmental and socioeconomic conditions.

12.4 There shall be outcome indicator(s) consistent with achieving management objectives seeking to avoid severe adverse impacts on dependent predators resulting from the unit of certification fishing on a stock under consideration that is a key prey species.

Refer to page 148-150 which gives specific guidance to assessors on the evaluation of key prey species.

An example is Atka mackerel

- Section 12, Clauses 12.7, 12.2, 12.1,
- https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC-RFM-V2.1-StandardFINAL-Sept-2020_Final-1.pdf

D . 5 M A N A G E M E N T M E A S U R E S

D.5.09 Ecosystem Structure, Processes and Function

GSSI Component	Guidance
The standard requires the existence of management measures, as necessary, designed to achieve the management objectives (D.2.08) that seek to minimize adverse impacts of the unit of certification, including any associated enhancement activities, on the structure, processes and functions of aquatic ecosystems that are likely to be irreversible or very slowly reversible.	<p>Ecosystem structure, processes and function are described in the Glossary. This language is in accordance with Section 4.1.4.1 of the FAO Ecosystem Approach to Fisheries, which suggests one of the broad management objectives for fisheries could be to keep impact on the structure, processes and functions of the ecosystem at an acceptable level.</p> <p>Adverse impacts that are likely to be irreversible or very slowly reversible are discussed in the Glossary. These may include genetic modification and changed ecological role.</p> <p>An earlier version of the requirements included an Essential Component on the conservation of biodiversity. Conservation of biodiversity is not mentioned separately in the Guidelines, but it is included in the CCRF Article 7.2.2 (d), which requires that States and sub-regional or regional fisheries management organizations and arrangements should adopt appropriate measures, based on the best scientific evidence available to provide that inter alia biodiversity of aquatic habitats and ecosystems is conserved. The structure, processes and function of aquatic ecosystems includes biodiversity, hence this is considered to be included in this Essential Component.</p>
Conclusion	References
<p>The RFM Program is in alignment because the potential impacts of the fishery on the ecosystem are considered throughout Section 12 of the Standard.</p> <p>Of particular relevance are clauses 12.2.10, There shall be outcome indicator(s) consistent with achieving management objectives seeking to minimize adverse impacts of the unit of certification (including any fishery enhanced activities) on the structure, processes, and function of aquatic ecosystems that are likely to be irreversible or very slowly reversible. Any modifications to the habitat for enhancing the stock under consideration must be reversible and not cause serious or irreversible harm to the natural ecosystem's structure, processes, and function.</p>	<ul style="list-style-type: none"> Responsible Fisheries Management Fisheries Standard Version 2.1 Section 12, Clauses 12.2.10, 12.1, 12.2, 3.2.4 https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC-RFM-V2.1-StandardFINAL-Sept-2020_Final-1.pdf

D . 5 M A N A G E M E N T M E A S U R E S

D.5.09 Ecosystem Structure, Processes and Function

Clause 12.1, The fishery management organization shall assess the impacts of environmental factors on target stocks and associated or dependent species in the same ecosystem, and the relationship among the populations in the ecosystem.

and Clause 12.2, The most probable adverse impacts from human activities, including fishery effects on the ecosystem/environment, shall be assessed and, where appropriate, addressed and or/corrected, taking into account available scientific information and local knowledge. This may take the form of an immediate management response or a further analysis of the identified risk. In this context, full consideration should be given to the special circumstances and requirements in developing fisheries, including financial and technical assistance, technology transfer, training, and scientific cooperation. In the absence of specific information on the ecosystem impacts of fishing on the unit of certification, generic evidence based on similar fishery situations can be used for fisheries with low risk of severe adverse impact. However, the greater the risk, the more specific evidence shall be necessary to ascertain the adequacy of mitigation measures.

Finally, Clause 3.2.4 states that "[Management measures shall provide...that] Biodiversity of aquatic ecosystems shall be conserved and ETP species shall be protected. Where relevant, there shall be pertinent objectives, and as necessary, management measures.

Taken together these clauses represent a clear requirement that the impacts of the fishery on the ecosystem be minimized.

D.5.10 Small Scale and/or Data Limited Fisheries

GSSI Component	Guidance
The standard recognizes management measures commonly used in small scale fisheries can achieve	This Essential Component derives from paragraph 32 of the Marine Ecolabelling Guidelines. It cuts across the other components covering management measures

D . 5 M A N A G E M E N T M E A S U R E S

D.5.10 Small Scale and/or Data Limited Fisheries

adequate levels of protection for stocks in the face of uncertainty about the state of the resource and that a past record of good management performance could be considered as supporting evidence of the adequacy of the management measures and the management system.

and seeks recognition within the certification scheme that less sophisticated management measures commonly used in small scale fisheries can still achieve adequate protection of stocks, providing uncertainty is properly addressed. The scheme could, for example, accept a past record of good outcomes under such management measures as evidence of their adequacy.

Conclusion

The RFM Program is in alignment with this component because the requirement is explicitly covered within Clause 5.1.1 of the RFM Standard, which states, "Less elaborate stock assessment methods are frequently used for small-scale or low-value capture fisheries resulting in greater uncertainty about the status of the stock under consideration. A more precautionary approach to managing fisheries on such resources shall be required, including, where appropriate, a lower level of resource utilization. A record of good management performance may be considered as supporting evidence of the adequacy of the management system".

The RFM assessment guidance also states in the introduction (page 5) that "The Fisheries Standard and related guidance is applicable to governance and management systems for small-scale and/or data limited fisheries, where appropriate, provided their performance can be objectively verified, with due consideration to the availability of data and the fact that management systems can differ substantially for different types and scales of fisheries".

References

- Guidance to Performance Evaluation for the Certification of Wild Capture and Enhanced Fisheries in North America V2.1
 - Pg 5 within Introduction
 - https://rfmcertification.org/wp-content/uploads/2021/06/AK-RFM-V2.1-GuidanceDraft-Jan-2021_Final.pdf
- RFM Program Guidance to Performance Evaluation for the Certification of Wild Capture and Enhanced Fisheries in North America
 - Page 5
 - https://cdn.rfmcertification.org/wp-content/uploads/2021/06/AK-RFM-V2.1-GuidanceDraft-Jan-2021_Final.pdf
- RFM Standard V2.1
 - Clause 5.1.1
 - https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC-RFM-V2.1-StandardFINAL-Sept-2020_Final-1.pdf

D.6 STOCK AND ECOSYSTEM STATUS AND OUTCOMES

D.6 STOCK AND ECOSYSTEM STATUS AND OUTCOMES

D.6.01 Certified Stocks

GSSI Component	Guidance
The standard requires that the stock under consideration is not overfished.	The stock under consideration is considered to be overfished if its stock size is below its limit reference point (or its proxy). Decision rules should avoid stocks falling below Blim but sometimes they do not for reasons that may or may not be wholly or partly due to the fishery and/or the management of the fishery. Nevertheless, the language in the Guidelines states that "the stock under consideration is not overfished, and is maintained at a level which promotes the objective of optimal utilization and maintains its availability for present and future generations." If the stock under consideration of a certified fishery becomes overfished, the scheme should cause the certification of this fishery to be suspended or revoked.
Conclusion	References
<p>The RFM Program is in alignment because the standard includes the following relevant clauses:</p> <p>Clause 6.1, The fishery management organization shall establish safe target reference point(s) for management. Management targets are consistent with achieving maximum sustainable yield (MSY), a suitable proxy, or a lesser fishing mortality—if that is optimal in the circumstances of the fishery (e.g., multispecies fisheries) or is needed to avoid severe adverse impacts on dependent predators.</p> <p>Clause 6.2, The fishery management organization shall establish appropriate limit reference point(s) for exploitation (i.e., consistent with avoiding recruitment overfishing or other impacts that are likely to be irreversible or very slowly reversible; Appendix 1, Part 1). When a limit reference point is approached, measures shall be taken to ensure that it will not be exceeded. For instance, if fishing mortality (or its proxy) is above the associated limit reference point, actions should be taken to decrease the fishing mortality (or its proxy) below that limit reference point.</p>	<ul style="list-style-type: none"> Responsible Fisheries Management Fisheries Standard Version 2.1 Clauses 6.1, 6.2, 6.3, https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC-RFM-V2.1-StandardFINAL-Sept-2020_Final-1.pdf

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D.6.01 Certified Stocks

Clause 6.3, "Data and assessment procedures shall be installed measuring the position of the fishery in relation to the reference points. Accordingly, the stock under consideration shall not be overfished (i.e. above limit reference point or proxy) and the level of fishing permitted shall be commensurate with the current state of the fishery resources, maintaining its future availability, taking into account that long term changes in productivity can occur due to natural variability and/or impacts other than fishing."

D.6.02 Certified Stocks

GSSI Component	Guidance
The standard requires the existence of outcome indicator(s) consistent with achieving management objectives for the stock under consideration (D.2.01, – D.2.03).	The relevant management objectives are those referred to in Performance Area 2 and are for the whole of the stock under consideration. The outcome indicators should be consistent with demonstrating that the management objectives have been effectively achieved. Outcome indicators are required for all management objectives for the stock under consideration, which may include, for example, target reference points that take into account the requirements of dependent predators, where appropriate (D.2.07).
Conclusion	References
<p>The RFM Program is in alignment because the standard includes the following relevant clauses:</p> <p>Clause 1.7 of the Standard states: Within the fishery management system, procedures shall be in place to keep the efficacy of current conservation and management measures and their possible interactions under continuous review, and to revise or abolish them in the light of new information.</p> <p>The fishery management organization shall establish safe target reference point(s) for management. Management targets are consistent with achieving maximum sustainable yield (MSY),</p>	<ul style="list-style-type: none"> Responsible Fisheries Management Fisheries Standard Version 2.1 Clauses 1.7, 6.1, 6.2, 6.3, https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC-RFM-V2.1-StandardFINAL-Sept-2020_Final-1.pdf

D.6 STOCK AND ECOSYSTEM STATUS AND OUTCOMES

D.6.02 Certified Stocks

a suitable proxy, or a lesser fishing mortality—if that is optimal in the circumstances of the fishery (e.g., multispecies fisheries) or is needed to avoid severe adverse impacts on dependent predators.

Clause 6.2, "The fishery management organization shall establish appropriate limit reference point(s) for exploitation (i.e., consistent with avoiding recruitment overfishing or other impacts that are likely to be irreversible or very slowly reversible; Appendix 1, Part 1). When a limit reference point is approached, measures shall be taken to ensure that it will not be exceeded. For instance, if fishing mortality (or its proxy) is above the associated limit reference point, actions should be taken to decrease the fishing mortality (or its proxy) below that limit reference point."

Clause 6.3, "Data and assessment procedures that measure the position of the fishery in relation to the reference points shall be established. Accordingly, the stock under consideration shall not be overfished (i.e., above limit reference point or proxy) and the level of fishing permitted shall be commensurate with the current state of the fishery resources, maintaining its future availability, and taking into account that long-term changes in productivity can occur due to natural variability and/or impacts other than fishing".

The draft hake/whiting assessment report, currently out to public consultation, provides examples of these clauses in practice on pages 99 (Clause 1.7); 213 (Clause 6.1); 215 (Clause 6.2); and 218 (Clause 6.3).

- RFM US Pacific Hake/Whiting Fishery Full Assessment Report – Public Comment Report 20 June 2022
- <https://rfmcertification.org/wp-content/uploads/2022/06/hake-RFM-MASTER-REPORT-PCDR-FINAL.pdf>

D.6.03 Enhanced Fisheries

GSSI Component	Guidance
The standard requires that the natural	All Essential Components that address Enhanced Fisheries can be "not applicable" to schemes that explicitly do not cover these fisheries. In the case of enhanced fisheries, the stock under consideration may comprise naturally reproductive

D.6 STOCK AND ECOSYSTEM STATUS AND OUTCOMES

D.6.03 Enhanced Fisheries

reproductive stock components of enhanced stocks are not overfished.	<p>components and components maintained by stocking. The natural reproductive stock component of enhanced stocks is described in the Glossary.</p> <p>In the context of avoiding significant negative impacts of enhancement activities on the natural reproductive components of the stock under consideration, the Inland Ecolabelling Guidelines state that displacement [of the naturally reproductive components of enhanced stocks by stocked components] must not result in a reduction of the natural reproductive stock component below abundance-based target reference points (or their proxies).</p> <p>Decision rules (D.5.03) should avoid stocks falling below Blim but sometimes they do not for reasons that may or may not be wholly or partly due to the fishery and/or the management of the fishery. Nevertheless, the language in the Guidelines states that both the stock under consideration and the naturally reproductive components of enhanced stocks are not overfished. In addition, naturally reproductive components of enhanced stocks are not substantially displaced by stocked components. If the stock under consideration of a certified fishery becomes overfished, the scheme should cause the certification of this fishery to be suspended or revoked.</p>
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Conclusion	References
<p>The RFM Program is in alignment because the standard includes the following relevant clauses:</p> <p>Clause 13.6 specifies "In the case of enhanced fisheries, the stock under consideration may comprise naturally reproductive components and components maintained by released from an enhancement facility. To avoid significant negative impacts of fishery enhancement activities on the natural reproductive components of the stock under consideration, the following shall apply: (1) naturally reproductive components of enhanced stocks shall not be overfished, and (2) naturally reproductive components of the stock under consideration shall not be displaced by enhanced components, and (3) in particular, displacement shall not result in a reduction of the stock under consideration below abundance-based target reference points (or their proxies) defined for the regulation of harvest."</p> <p>Also relevant is</p>	<ul style="list-style-type: none"> Responsible Fisheries Management Fisheries Standard Version 2.1 Clauses 13.14, 6.1, 6.2, 6.3, 13.1.1 https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC-RFM-V2.1-StandardFINAL-Sept-2020_Final-1.pdf

D . 6 S T O C K A N D E C O S Y S T E M S T A T U S A N D O U T C O M E S

D.6.03 Enhanced Fisheries

Clause 6.1: The fishery management organization shall establish safe target reference point(s) for management. Management targets are consistent with achieving maximum sustainable yield (MSY), a suitable proxy, or a lesser fishing mortality—if that is optimal in the circumstances of the fishery (e.g., multispecies fisheries) or is needed to avoid severe adverse impacts on dependent predators.

Clause 6.2, "The fishery management organization shall establish safe limit reference point(s) for exploitation (i.e. consistent with avoiding recruitment overfishing or other impacts that are likely to be irreversible or very slowly reversible). When a limit reference point is approached, measures shall be taken to ensure that it will not be exceeded. For instance, if fishing mortality (or its proxy) is above the associated limit reference point, actions should be taken to decrease the fishing mortality (or its proxy) below that limit reference point."

Clause 6.3, "Data and assessment procedures shall be installed measuring the position of the fishery in relation to the reference points. Accordingly, the stock under consideration shall not be overfished (i.e. above limit reference point or proxy) and the level of fishing permitted shall be commensurate with the current state of the fishery resources, maintaining its future availability, taking into account that long term changes in productivity can occur due to natural variability and/or impacts other than fishing."

Clause 13.1.1, In the case of enhanced fisheries, the fishery management organization should take into account natural production, and shall take appropriate actions for conserving genetic diversity and biodiversity, protecting ETP species, maintaining aquatic ecosystems, minimizing adverse impacts on ecosystem structure and function, controlling disease, and maintaining the quality of enhanced stock. Enhanced fisheries may be supported in part by stocking organisms produced in aquaculture facilities or removed from wild stocks other than the stock under consideration. Aquaculture production for stocking purposes shall be managed and developed according to the above provisions.

D.6 STOCK AND ECOSYSTEM STATUS AND OUTCOMES

D.6.04 Enhanced Fisheries

GSSI Component	Guidance
In the case of enhanced fisheries, the standard requires that the natural reproductive stock component of enhanced stocks is not substantially displaced by stocked components.	<p>All Essential Components that address Enhanced Fisheries can be "not applicable" to schemes that explicitly do not cover these fisheries. In the case of enhanced fisheries, the stock under consideration may comprise naturally reproductive components and components maintained by stocking. The natural reproductive stock component of enhanced stocks is described in the Glossary.</p> <p>With respect to "substantially displaced", in particular, displacement must not result in a reduction of the natural reproductive stock component below abundance-based target reference points (or their proxies).</p>
Conclusion	References
<p>The RFM Program is in alignment because the standard includes the following relevant clauses:</p> <p>Clause 13.1, The fishery management organization shall promote responsible development and management of fisheries enhancement, including an advanced evaluation of the effects of fisheries enhancement on genetic diversity and ecosystem integrity, based on the best scientific evidence available and/or verifiable and objective traditional, fisher, or community knowledge. Significant uncertainty is to be expected in assessing possible adverse ecosystem impacts of fisheries, including culture and enhancement activities. This issue can be addressed by taking a risk assessment/risk management approach.</p> <p>In addition, Clause 13.1.1 In the case of enhanced fisheries, the fishery management organization should take into account natural production, and shall take appropriate actions for conserving genetic diversity and biodiversity, protecting ETP species, maintaining aquatic ecosystems, minimizing adverse impacts on ecosystem structure and function, controlling disease, and maintaining the quality of enhanced stock. Enhanced fisheries may be supported in part by stocking organisms produced in aquaculture facilities or removed from wild stocks other than the stock under consideration. Aquaculture production for stocking purposes shall be managed and developed according to the above provisions.</p>	<ul style="list-style-type: none"> Responsible Fisheries Management Fisheries Standard Version 2.1 Clauses 13.1, 13.1.1, 13.14, https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC-RFM-V2.1-StandardFINAL-Sept-2020_Final-1.pdf

D.6 STOCK AND ECOSYSTEM STATUS AND OUTCOMES

D.6.04 Enhanced Fisheries

Clause 13.6 specifies "In the case of enhanced fisheries, the stock under consideration may comprise naturally reproductive components and components maintained by released from an enhancement facility. To avoid significant negative impacts of fishery enhancement activities on the natural reproductive components of the stock under consideration, the following shall apply: (1) naturally reproductive components of enhanced stocks shall not be overfished, and (2) naturally reproductive components of the stock under consideration shall not be displaced by enhanced components, and (3) in particular, displacement shall not result in a reduction of the stock under consideration below abundance-based target reference points (or their proxies) defined for the regulation of harvest."

D.6.05 Non-certified Catches

GSSI Component	Guidance
The standard requires the existence of outcome indicator(s) consistent with achieving management objectives for non-certified stocks (i.e. stocks/species in the catch that are other than the stock under consideration) (D.2.04).	<p>The relevant management objectives are those referred to in Performance Area 2 and are for non-certified species/stocks. The outcome indicators should be consistent with demonstrating that the management objectives (D.2.04) have been effectively achieved. Non-certified catches refers to species/stocks that are taken by the unit of certification other than the stock for which certification is being sought (see Glossary).</p> <p>Examples of irreversible or very slowly reversible effects on bycatch species include excessive depletion of very long-lived organisms (see Glossary). To mitigate effects that are likely to be irreversible or very slowly reversible requires those effects to be made less severe such that they are no longer likely to be irreversible or very slowly reversible.</p>
Conclusion	References
The RFM Program is in alignment because clause 12.2.3 There shall be outcome indicator(s) consistent with achieving management objectives for	<ul style="list-style-type: none"> Responsible Fisheries Management Fisheries Standard Version 2.1 Clause 12.2.3

D.6 STOCK AND ECOSYSTEM STATUS AND OUTCOMES

D.6.05 Non-certified Catches

non-target species (i.e., avoiding overfishing and other impacts that are likely to be irreversible or very slowly reversible).

- https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC-RFM-V2.1-StandardFINAL-Sept-2020_Final-1.pdf

D606 Endangered Species

GSSI Component	Guidance
The standard requires the existence of outcome indicator(s) consistent with achieving management objectives (D.2.05) that seek to ensure that Endangered species are protected from adverse impacts resulting from interactions with the unit of certification and any associated culture or enhancement activity, including recruitment overfishing or other impacts that are likely to be irreversible or very slowly reversible.	<p>The context of this Essential Component is Endangered Species. Endangered species are defined in the Glossary. These species are already adversely impacted at the population level, by definition, and are susceptible to further adverse impacts at this level from which they need to be protected. Where "adverse impacts" is used in relation to Endangered Species in the FAO Guidelines there is no further qualification provided (i.e. no "significant" or "severe"). Elsewhere in the Guidelines, the term "adverse impacts" is qualified, but in each case this is in a very specific context. For example. The term "significant negative impacts" is used in the FAO Ecolabelling Guidelines only in relation to enhanced fisheries and "severe adverse impacts" is used only in relation to dependent predators. The term "significant adverse impacts" occurs only in the Deep Sea Guidelines with respect to VMEs.</p> <p>The outcome indicators required by the standard should be consistent with demonstrating that the management objectives for Endangered Species (D.2.05) have been effectively achieved. The actual outcome would be measured by an assessment required under D.4.10.</p> <p>The FAO Ecolabelling Guidelines acknowledge that much greater scientific uncertainty is to be expected in assessing possible adverse ecosystem impacts of fisheries than in assessing the state of target stocks (paragraph 31 (41)), hence the outcome indicators necessary to meet this Essential Component should take into account risk and uncertainty.</p>

D.6 STOCK AND ECOSYSTEM STATUS AND OUTCOMES

D606 Endangered Species

Conclusion	References
<p>The RFM Program is in alignment because the standard includes the following relevant clause:</p> <p>Clause 12.2.3 There shall be outcome indicator(s) consistent with achieving management objectives for non-target species(i.e., avoiding overfishing and other impacts that are likely to be irreversible or very slowly reversible).</p> <p>Clause 12.12 outlines outcome indicators associated with endangered species: "There shall be outcome indicator(s) consistent with achieving management objectives that seek to ensure that endangered species are protected from adverse impacts resulting from interactions with the unit of certification and any associated culture or enhancement activity, including recruitment overfishing or other impacts that are likely to be irreversible or very slowly reversible."</p>	<ul style="list-style-type: none"> • Responsible Fisheries Management Fisheries Standard Version 2.1 • Clauses 12.2.3, 12.12 • https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC-RFM-V2.1-StandardFINAL-Sept-2020_Final-1.pdf

D.6.07 Habitat

GSSI Component	Guidance
<p>The standard requires the existence of outcome indicator(s) consistent with achieving management objectives (D.2.06) for avoiding, minimizing or mitigating the impacts of the unit of certification on essential habitats for the "stock under consideration" and on habitats that are highly vulnerable to damage by the</p>	<p>The outcome indicators should be consistent with demonstrating that the management objectives have been effectively achieved for habitat (D.2.06).</p> <p>Essential habitats are described in the Glossary. Examples of impacts on habitat that should be avoided include the destruction or severe modification of rare and/or vulnerable habitats. In assessing fishery impacts, the full spatial range of the relevant habitat should be considered, not just that part of the spatial range that is potentially affected by fishing.</p> <p>The FAO Guidelines acknowledge that much greater scientific uncertainty is to be expected in assessing possible adverse ecosystem impacts of fisheries than in assessing the state of target stocks (paragraph 31 (41)), hence the outcome indicators necessary to meet this Essential Component should take into consideration risk and uncertainty.</p>

D.6 STOCK AND ECOSYSTEM STATUS AND OUTCOMES

D.6.07 Habitat

fishing gear of the unit of certification.

Conclusion

The RFM Program is in alignment because the standard includes the following relevant clauses:

Most importantly for this Essential Component, Clause 12.2.8, There shall be outcome indicator(s) consistent with achieving management objectives for avoiding, minimizing, or mitigating the impacts of the unit of certification on essential habitats for the stock under consideration and on habitats that are highly vulnerable to damage by the fishing gear of the unit of certification.

References

- Responsible Fisheries Management Fisheries Standard Version 2.1
- Clauses 12.2.3, 12.2.8
- https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC-RFM-V2.1-StandardFINAL-Sept-2020_Final-1.pdf

D.6.08 Dependent Predators

GSSI Component

The standard includes outcome indicator(s) consistent with achieving management objectives (D.2.07) that seek to avoid severe adverse impacts on dependent predators resulting from fishing on a stock under consideration that is a key prey species.

Guidance

The outcome indicators should be consistent with demonstrating that the management objectives have been effectively achieved for dependent predators (D.2.07). Dependent predators are described in the Glossary.

The FAO Guidelines acknowledge that much greater scientific uncertainty is to be expected in assessing possible adverse ecosystem impacts of fisheries than in assessing the state of target stocks (paragraph 31 (41)), hence the outcome indicators should take into account risk and uncertainty.

Conclusion

The RFM Program is in alignment because the standard includes the following relevant clause:

References

- Responsible Fisheries Management Fisheries Standard Version 2.1
- Clauses 12.2.3, 12.4

D.6 STOCK AND ECOSYSTEM STATUS AND OUTCOMES

D.6.08 Dependent Predators

Clause 12.2.3 There shall be outcome indicator(s) consistent with achieving management objectives for non-target species(i.e., avoiding overfishing and other impacts that are likely to be irreversible or very slowly reversible)."

Most importantly, Clause 12.4 clearly outlines outcome indicators associated with dependent predators; There shall be outcome indicator(s) consistent with achieving management objectives seeking to avoid severe adverse impacts on dependent predators resulting from the unit of certification fishing on a stock under consideration that is a key prey species.

- https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC-RFM-V2.1-StandardFINAL-Sept-2020_Final-1.pdf

D.6.09 Ecosystem Structure, Processes and Function

GSSI Component	Guidance
The standard requires the existence of outcome indicator(s) consistent with achieving management objectives (D.2.08) that seek to minimize adverse impacts of the unit of certification, including any enhancement activities, on the structure, processes and function of aquatic ecosystems that are likely to be irreversible or very slowly reversible. Any modifications to the habitat for enhancing the stock under consideration must be reversible and not cause serious or irreversible harm to	<p>The outcome indicators should be consistent with demonstrating that the management objectives for impacts on the structure, processes and function of aquatic ecosystems (D.2.08) have been effectively achieved. The component relating to enhancement activity may be "not applicable" to schemes that explicitly do not cover enhanced fisheries.</p> <p>Ecosystem structure, processes and function are described in the Glossary. This language is in accordance with Section 4.1.4.1 of the FAO Ecosystem Approach to Fisheries, which suggests one of the broad management objectives for fisheries could be to keep impact on the structure, processes and functions of the ecosystem at an acceptable level.</p> <p>The FAO Guidelines acknowledge that much greater scientific uncertainty is to be expected in assessing possible adverse ecosystem impacts of fisheries than in assessing the state of target stocks (paragraph 31 (41)), hence the outcome indicators necessary to meet this Essential Component should take into account risk and uncertainty.</p>

D . 6 S T O C K A N D E C O S Y S T E M S T A T U S A N D O U T C O M E S

D.6.09 Ecosystem Structure, Processes and Function

the natural ecosystem's structure, processes and function.

Conclusion

The RFM Program is in alignment because the standard includes the following relevant clauses:

Also relevant is Clause 12.2.3 There shall be outcome indicator(s) consistent with achieving management objectives for non-target species (i.e., avoiding overfishing and other impacts that are likely to be irreversible or very slowly reversible).

Most importantly, Clause 12.2.10, There shall be outcome indicator(s) consistent with achieving management objectives seeking to minimize adverse impacts of the unit of certification (including any fishery enhanced activities) on the structure, processes, and function of aquatic ecosystems that are likely to be irreversible or very slowly reversible. Any modifications to the habitat for enhancing the stock under consideration must be reversible and not cause serious or irreversible harm to the natural ecosystem's structure, processes, and function.

References

- Responsible Fisheries Management Fisheries Standard Version 2.1
- Clauses 12.2.3, 12.2.10
- https://cdn.rfmcertification.org/wp-content/uploads/2021/06/CSC-RFM-V2.1-StandardFINAL-Sept-2020_Final-1.pdf