

Certified Seafood Collaborative (CSC)
Notice of Temporary Variance associated with RFM Chain of Custody
Certification Audit Processes

Variance Notification to Certification Bodies



To: CSC CoC Approved Certification Bodies

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A decision has been taken by the CSC Executive Committee to allow a temporary standard variance for specific subcontractor clauses, under specific circumstances, until a new formal permanent standard change is issued.

The reason for the variance is to allow simple subcontractor processes to be risk assessed before determining the need for full certification for the subcontractor.

The CSC team will offer online training to CBs on request on these variances and to interested relevant parties.

Variance to Standard/Clauses:

Unified Responsible Fisheries Management (RFM) Chain of Custody Standard. Issue 2.5 December 2021.

Ref: 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.

Ref: 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.

Effective Date: The effective date shall be one week from the date of publication of this notice.

Expiration Date: This Variance will be kept under continuous review and will be incorporated into the next version of the General Certification Requirements, and will expire on the effective date of that version.

The Variation -amendment to clauses:

- 1.7 Where the Applicant utilizes the services of a subcontractor (carrying out contract processing, packaging, or labelling activities), certification of the Subcontractor to the RFM Chain of Custody Standard may not be required under certain circumstances.
- 5.8 Where a Multi-site Organization utilizes the services of a subcontractor (carrying out contract processing, packing or labelling activities), certification of the subcontractor to the RFM Chain of Custody Standard may not be required under certain circumstances.

In all circumstances the Certification Body shall require the client to provide details of how the client will retain full control of each subcontractor.

The Circumstances that DO NOT require subcontractor to be certified to the RFM Chain of Custody Standard include:

In circumstances where:

- The subcontractor does not take legal ownership of the intended certified seafood.

And
- The subcontractor is a storage/transporter/distributor of product in its final packaging prior to consumer sale.

Or
- A remote assessment of the subcontractor has been carried out to determine that there are adequate controls in place to ensure that non-certified product cannot be misrepresented as certified product.

Applicant Requirements:

- The Applicant requiring RFM CoC certification shall maintain an accurate and up-to-date list of details of all subcontractors that it uses for handling certified product and provide this to the Certification Body including:
 - Subcontractor entity legal name and address
 - The address of the site(s) (if different from the above) where subcontracting activity(ies) occur.
 - A description of the activity(ies) carried out at the site(s) on certified or intended to be certified product (refer to Table 1 for a list of descriptions).
- The Applicant shall provide the Certification Body sufficient documentation concerning the subcontractor to allow a remote risk assessment to be conducted including the information as per Table 1.
- The Certification Body shall ensure that there is sufficient documentation to confirm that the Applicant meets the requirement of certification in accordance with Sections 1- 4 of the RFM CoC Standard.

Multi-site CoC Applicants:

- the additional requirements of sections 5, 6 and 7 concerning the sub-contractor(s) that handle certified product.

For all Applicants:

- New subcontractors and changes to the circumstances of existing subcontractors (scope of activities, new sites, change of site) shall be provided by the Applicant in advance to the Certification Body prior to handling of certified product by that subcontractor.
- Where the outcome of the remote assessment conducted by the Certification Body is above an acceptable risk threshold (as determined by the Certification Body, the Certification Body shall perform an on-site audit* of the sub-contractor, in accordance with the requirements of the RFM CoC Standard.
- In the cases, where an on-site audit of the sub-contractor is determined, the Applicant shall be informed in advance of the Subcontractor activity (ies) taking place.
- An audit date shall be determined and provided to both the Applicant and the Subcontractor representative.
- An audit does not require a separate Application from the subcontractor unless the subcontractor requests separate RFM CoC certification.
- Where findings are raised at the onsite audit at the subcontractor, corrective action evidence shall be provided in advance of the Applicant utilising the subcontractor for the handling of certified product.
- Where the remote assessment conducted by the Certification Body is below the maximum risk threshold, the Applicant may proceed to use the services of the subcontractor for handling certified product without an onsite audit.
- The Certification Body shall provide written confirmation to the Applicant of the outcome of remote assessments on subcontractors and maintain a record of all subcontractors used by Applicants including the outcome of each subcontractor remote assessments.
- The Applicant shall be responsible for the Certification Body costs associated with the subcontractor audit unless a separate RFM CoC certification audit is requested by the subcontractor. In this event, costs shall be decided between the Applicant and subcontractor and the CB shall confirm the entity responsible for cost and the certificate holder, on eventual certification.

*an onsite audit of a subcontractor does not constitute a certification audit.

Table 1: Remote Risk Assessment Template for CB Risk Evaluation of Subcontractors

Risk area	Evidence of risk management
Geography	Legislative Control
Activity (ies) Refer to table	Primary (Handling with no change to product form/Heading Gutting) Secondary (Portioning /bulk Packing/not final consumer packing) Final packing for consumer Repacking/no change to consumer ready packing Repacking for final consumer Labelling (final consumer) Incl. RFM logo Branding Storage & Distribution (excluding transshipment) Processing at sea Trader
Quantity of Certified Product Handled/to be Handled	Greater volumes may be associated with increased risk depending on process controls in place
Organisation Size / Type / No.	Number of Subcontractor Sites
Other certification held	MSC/ASC CoC, GFSI recognised standard
Any certification suspended	MSC, ASC, GFSI, Social
Other non-certified species and processes	Only RFM certified species Other not intended to be certified species are handled but are uniquely different or processed differently (e.g. crustacea not finfish; fresh not frozen). Other not intended to be certified species are handled and are similar (e.g. whitefish fillets but different species). Other not intended to be certified species are handled and are the same species as the certified species.

	Mixing of certified/non certified seafood where the latter is <5% by weight.
% volume of other noncertified similar products	Potential for error or substitution
Legal Ownership declarations	Has the Applicant provided proof that the subcontractor does not take title of the certified product.
Details of signed Subcontractor agreement	Has the Applicant provided proof of a signed agreement with the subcontractor as per clause 1.8 or 5.9.
Details of Management System Internal audit by subcontractor Applicant audit of subcontractor	Has the Applicant provided evidence that the subcontractor meets the requirements of clause 1.8/5.9 (as applicable) and all other requirements applicable to RFM CoC certification of the Applicant and it's products.

- Certification Bodies at their discretion, shall update remote assessments based on new evidence that may come to light and changes to the scope of activities of Applicant subcontractors.