CSI Procedure 4 Application to Certification Procedures for the CSI Unified Chain of Custody Standard

Certified Seafood International (CSI) Certification Program

Fully Aligned to ISO 17065

CSI Procedure 4 Version 5.3: Application to Certification Procedures for the CSI Unified Chain of Custody Standard, November 2025

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1. Purpose and Scope

This document defines the procedures required for all Applicants wishing to apply for certification approval to the Certified Seafood International (CSI) Unified Chain of Custody Standard. These procedures ensure that all applications and recertifications of existing certificate holders are processed in a consistent, professional and equitable manner. These procedures offer Certification Bodies a format that can be used independently or incorporated into existing procedures.

The Scope of the Chain of Custody is defined in the Unified Standard (Page 6) and includes:

a) Processing Vessel / Processing Vessel Group;

b) Primary Processor;

c) Secondary Processor (may include packing and repacking of product);

d) Subcontractor and Service Provider (carrying out contract processing, packing or labeling activities);

e) Trader; and

f) Market / Retailer / Restaurant / Distributor.

This procedure defines the method for the three options for certification by which initial, recertification and surveillance audits for certification to the CSI Unified Chain of Custody Standard are evaluated and processed.

There are three options for certification:

a. Single-site certification;

b. Multi-site certification; and

c. Unpackaged at point of sale (UPOS) certification.

2. Inquiries and Requests for Application

Any inquiries to the Certification Body concerning CSI Unified Chain of Custody assessments will be directed to the Certification Body Program Manager, who must be must be fully trained in the CSI Unified Chain of Custody (CoC) Program. The Certification Body will discuss with the potential applicant the full details of the assessment application process including the Standard's requirements, scope of assessment, time frames, and assessment fees. Following the initial contact, the potential applicant will be sent an information packet containing an official CoC program application form and a comprehensive list of all the CSI Unified CoC program requirements.

3. Application Processing

Applicants must submit a completed CSI Unified CoC Program application form received from the Certification Body to apply for CoC certification under the CSI Program.

A submitted application will serve as a temporary contract between the potential applicant and the Certification Body, thereby confirming the applicant's commitment to abide by the Certification Body certification process protocols as set forth in the informational packet.

On receipt of an application, the Certification Body will record the date of receipt and review the application to

establish an appropriate assessment plan, including the timeframe for the assessment, based on the nature, size, complexity, and technical resources of the applicant's operations and the associated risks. The Certification Body may contact the applicant to obtain additional information needed for the assessment plan.

The Certification Body will provide the assessment plan to the potential applicant along with a cost estimate for the assessment.

Applicant CoC Numbering

The Certification Body shall assign a CSI CoC Number to the applicant file and this number should be the key reference for the Certificate and all enquiries from new applicants . The CoC number shall be based on the following numeric model:

For Single unit sites: CSI - S - Four digit code
For Multi Unit sites: CSI - M - Four digit code
For Unpackaged at Point of Sale (UPOS) sites: CSI - U - Four digit code

Note: For fishery certificates, the model registration code uses an "F" in place of S/M/U (e.g., CSI – F – ####).

CSI New CoC Number Examples

Single unit site: CSI-S-1234

Multi unit: CSI-M-1235

UPOS unit: CSI-U-1236

- CSI: Name of the Program
- S: Single site
- M: Multisite
- U: UPOS
- 1234 is the Unit of Registration (each CB is allocated a number range)

The CSI management team will allocate a unique sequence of numbers for the unit of registration to each Certification Body to avoid duplication of numbers by other Certification Bodies, e.g 0001-2000.

This CoC number will be communicated to the CSI management team and listed on the CoC Certificate and used in association with logo usage on packaging.

All information submitted by the potential applicant to the Certification Body shall be available to CSI upon request.

4. Assessment Personnel and Scheduling

All assessments are arranged by the Certification Body and must be conducted by an approved CSI assessor (see CSI Procedure 8 – Appointment and Control of CSI Assessors).

If a sub-contracted assessor is used, written authorization confirming the subcontractor's qualifications to conduct the assessment must be sent to the potential applicant, and the subcontractor's name must be entered

in the potential applicant's file. The subcontractor's full assessment plan schedule must be attached to the written authorization, highlighting the dates and sites to be assessed. When the assessment is scheduled, the subcontractor must bring the written authorization and all associated assessment information to the potential applicant's site.

Once an assessment is scheduled, the potential applicant is notified of the date by letter of confirmation. This letter will state the inspection date and time, the inspection agenda, plus provides a time-stamped copy of the Certification Body's own certification protocols for the CSI CoC Program. The potential applicant will now become an applicant to the CSI CoC program.

The Pre-assessment Phase of the Audit:
The pre-assessment discussion will be scheduled on a date agreed to by the applicant and the Certification Body. The assessment will include a discussion on the requirements of the CSI Unified Chain of Custody Standard relative to the applicant's customers and products to be assessed to determine the most appropriate audit plan for the applicant.

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 the CSI Program Manager stating the reasons for such failure.

Travel Arrangements:
For all applicant assessments, all necessary travel arrangements (such as flights, hotels and ground transportation) must be made by agreement with the applicable Certification Body and the applicant.

5. Assessment Standards and Scope

Assessments shall follow the requirements of the CSI Unified CoC Standard and use the approved Assessment Report checklist provided by the Certification Body coordinating the assessment.

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.

6. Pre-assessment Process

As part of the pre-assessment process, applicants shall submit details of the traceability systems used on their site and the components and operation of their quality management systems to the Certification Body to support a pre-evaluation of the operation before the assessment to determine the most appropriate audit plan for the applicant to protect the integrity of the certificated CSI species.

7. Assessment Process

The Assessment incorporates multiple factors gathered from an applicant's application and from the on-site assessment. These include, but are not limited to the following:

a) Product risk considering the applicant's position within the supply chain;

b) Applicant size and technical resources, including the production area, product lines, employees, and employee turnover; and

c) The Applicant's knowledge of the CSI CoC Program and the consistency of the program's requirements with existing operations.

7.1 Onsite assessment Requirements

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:

a) An opening meeting to confirm the scope of the applicant's assessment;

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

c) An inspection of the production facility to verify implementation of the traceability systems;

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

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

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

g) A closing meeting to discuss compliance with the CSI CoC Standard.

7.2 Assessment of Subcontractors and Service Providers

The Certification Body shall approve all Subcontractors and Service Providers in accordance with the requirements set out below.

The Certification Body shall perform a desktop review and evaluation of each Subcontractor and Service Provider presented by the Applicant for inclusion under the Applicant's Chain of Custody certificate to reach one of the following determinations:

- The Subcontractor or Service Provider is approved to perform the requested activities under the Applicant's Chain of Custody certificate; OR
- Additional onsite assessment is required to determine whether the Subcontractor or Service Provider is approved to perform the requested activities under the Applicant's Chain of Custody certificate.

The Certification Body shall ensure it has sufficient information and documentation for each Subcontractor or Service Provider to facilitate a desktop review and evaluation utilizing the information and considerations in Table 1.

Review and Evaluation of Service Providers

- The primary objective of the review and evaluation of Service Providers is to verify that the Service Provider performs only transport, distribution and/or storage activities for the Applicant.
- If the Certification Body confirms this during the review and evaluation, the Certification Body shall approve the Service Provider to perform applicable activities under the Applicant's Chain of Custody certificate.
- Those Service Providers who are determined to perform activities outside of the defined Service Provider scope shall undergo the review and evaluation process for Subcontractors described below.

Review and Evaluation of Subcontractors

- The Certification Body shall reference Table 1 and other factors deemed relevant in the desktop review and evaluation of the Subcontractor.
- Where the desktop review and evaluation of a Subcontractor indicates an acceptably low level of risk for non-compliance with relevant Unified Chain of Custody Standard criteria, the Certification Body shall approve the Subcontractor to perform applicable activities under the Applicant's Chain of Custody certificate.
- Where the desktop review and evaluation of a Subcontractor indicates that additional assessment is required to approve the Subcontractor under the Applicant's Chain of Custody certificate, the Certification Body shall:
  - Inform the Applicant in writing that an onsite assessment of the Subcontractor is required before the Subcontractor can be approved to perform the requested activities under the Applicant's Chain of Custody certificate;
  - Coordinate with the Applicant and the Subcontractor on the scheduling of an onsite assessment;
  - Inform the Applicant and Subcontractor of the option for the Subcontractor to pursue its own Chain of Custody certificate;
  - Provide a cost estimate for the onsite assessment to the Applicant.

In preparing for and performing the onsite assessment, the Certification Body:

- Shall utilize information previously collected for the desktop review and evaluation and request any additional information required to perform the onsite assessment;
- May utilize all of part of the onsite assessment steps defined in section 7.1 in performing the onsite assessment (Note that while the onsite assessment is in accordance with the requirements of the Unified Chain of Custody Standard, this onsite assessment does not constitute a certification audit.);
- Shall assess conformance against relevant criteria using conformance levels and processes defined in section 7.3.

Non-conformances raised at the onsite assessment of a Subcontractor shall be included in the Applicant's audit report. The Applicant is responsible for working with the Subcontractor to develop, implement and provide evidence of corrective action to the Certification Body.

For all approved Subcontractors and Service Providers, the Certification Body shall:

- Provide written approval to the Applicant permitting the use of defined services of the Subcontractor or Service Provider under the Applicant's Chain of Custody for handling certified product;

- Keep record of its approval of the Subcontractor or Service Provider to perform defined activities under the Applicant's Chain of Custody certificate.

The Certification Body shall:

- Maintain a record of all approved Subcontractors and Service Providers used by Applicants including the outcome of all desktop reviews and onsite assessments.
- Update those desktop reviews/onsite assessments as needed based on new information, changes in scope or activities, or at the CB's discretion.

Table 1 Assessment of Subcontractors[1]

Evaluation Area	Factors
Operating Jurisdiction	Relevant regulatory requirements / oversight
Activity (ies) Performed	Ranked from high to low risk: - Primary processing (e.g. heading, gutting, loining) - Secondary processing (e.g. portioning, bulk packing) - Final processing / packaging to consumer-ready format - Repacking – no change to consumer-ready package - Trading
Scale of Operations	Number of Subcontractor sites performing activities for the Applicant
Volume of Product Handled / To be Handled	Higher risk is associated with higher volume
Composition of Product Handled / To be Handled	Mix of certified vs. non-certified product Species of similar appearance (certified and non-certified) Mix of processing method across species and certified and non-certified product Intentional mixing of non-certified product with certified product at less than 5% of total
Subcontractor Certification	Relevant certificates could include MSC/ASC CoC, GFSI recognized food safety, social audits. Prior or current suspensions of certificates No Certification
Applicant-Subcontractor Agreement & Relationship	Contract components addressing at a minimum the requirements of clause 1.8
Subcontractor Internal Controls	Relevant internal audit processes

[1] If the Subcontractor has a valid CSI Chain of Custody Certificate, no onsite audit is required.

7.3 Conformance Levels

Level Type	Description	Certification Body Action
CRITICAL (Assessment)	This level indicates a substantial non-conformance or failure to or gap in compliance with the Standard that is highly likely to result in mislabeling of fish or there is clear evidence deliberate mis-labeling has occurred. For example, seafood intended to be labeled as certified under the CSI Program was found to be intermingled with fish from a from a fishery that is not certified fish is likely to be mislabeled.	Assessment - Certification Body does not grant certification and sets up a re-evaluation to verify that non-conformance has been resolved and that the applicant has implemented systems that prevent the non- conformance from recurring. Surveillance Audit - Certification Body immediately suspends certification (pending an investigation), informs CSI of the suspension, and sets up a re-evaluation to verify non-conformance resolution and that the approved applicant has put in place systems that prevent the loss of chain of custody from reoccurring.
MAJOR	This level indicates that there is a substantial non- conformance or failure or gap in compliance with the Standard that has potential to result in mislabeling of fish. For example, the documentation of the traceability system is found to be flawed the system may present a significant risk of mislabeling of fish.	Assessment / Reassessment- Certification Body issues a certification once an adequate action plan has been submitted to correct the non-conformances. Surveillance Audit - Certification Body will inform the approved applicant of this Major non-compliance and will ask for an action plan to rectify the non- compliance. If no action plan is forthcoming or in the view of the Certification Body the action fails to rectify noncompliance, the approved applicant will have its certification suspended (pending an investigation). The Certification Body will inform CSI of any suspension, and will set up a re-evaluation to verify non- conformance resolution, to ensure that the approved applicant has put in place systems to prevent the recurrence of the non-conformance.

Level Type	Description	Certification Body Action
MINOR	This level indicates that non-compliance with the Standard that is unlikely to result in mislabeled fish.	Assessment and Audit - Certification Body will inform the approved applicant of this Minor Non- Compliance and will ask for an action plan to rectify the non-compliance on an agreed schedule prior to the next surveillance audit. If the action plan is not completed prior to the next surveillance audit, the non-compliance will be reclassified as a Major and will follow the course of action thereunder.
MINOR (Surveillance Audit)	This level indicates that the non-conformance fails to comply with the principles of the Standard.	Certification Body will inform the approved applicant of this Minor Non-Compliance and will ask for an action plan to rectify the non-compliance on an agreed schedule prior to the next audit. If the action plan is not completed prior to the next audit, the non-compliance will be reclassified as a Major and will follow the course of action thereunder.

7.4 Closing Meeting

In the closing meeting, the assessor presents their findings to the applicant identifying non-conformances to the CSI Unified CoC standard. From this discussion, the assessor will prepare written findings including the identified non-conformances for use by the applicant's technical representative. These findings will not include any statement as to whether the Applicant has achieved certification.

If a critical non-conformance is established at the closing meeting of an annual surveillance audit, the approved member of the program will be instructed to immediately inform its customers of the suspension of its certificate. Additionally, the existing member will be required to provide its customers with information regarding the corrective action that will be taken to address the non-conformance and the status of its certificate on an ongoing basis.

Note: *As necessary, operation assessments can be conducted in a foreign language; however, all notes resulting from the assessment must be translated into English and the Final Assessment Report must be written in English.*

8. Customer Notification of Traceability and Legality Issues

Many purchasers request immediate notification by the Certification Body in the event of serious traceability or legality issues resulting from a supplier inspection (assessment). When this occurs, the Certification Body will determine, with the applicant, the best means for honoring the purchaser's request.

In all cases, copies of the Assessment Report can only be sent to a third-party entity with written consent of the Applicant.

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 they are 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.

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.

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.

If since the previous audit, the approved member has handled no products labeled as certified, an annual audit is not required to maintain their approval to the CSI Unified Chain of Custody Standard.

10. Issuance of Assessment Reports

A 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 CSI 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.

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.

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 within 15 calendar days from the date of the assessment. See Table 7.3 "Conformance Levels" for appropriate Certification Body actions.

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.

12. Final Assessment Report

After the onsite assessment, the assessor shall prepare a final Assessment Report for submission to the Certification Body Program Manager/Administrator for approval.

The Certification Body Program Manager/Administrator will verify the following:

a) That the assessor's notes fully substantiate any non-conformances raised in the final Assessment Report and that copies of the non-conformances have been placed in the applicant's file;

b) That the assessor's report of non-conformance was not recorded as a statement of corrective action or direction;

c) That the report specifies all time periods for corrective actions; and

d) That the report includes evidence of all corrective action taken by the applicant since the assessment.

The Certification Body Program Manager/Administrator shall submit the report with the file of documented evidence to the Certification Committee for review to determine if the applicant has complied with all clauses of the CSI Unified CoC Standard.

Within 3 working days of approval of the final Assessment Report, the Certification Body shall send the certification decision and a copy of the final Assessment Report to the applicant.

The certification decision shall be:

a) Certification Achieved,

b) Certification Not Achieved, or

c) Certification Not Granted

In the case of a ***Certification Not Achieved*** decision, the applicant will be required to provide additional information requested by the Certification Committee within seven (7) working days of the notification.

In the case of a ***Certification Not Granted*** decision, the applicant has failed to demonstrate that it meets the requirements of the CSI Unified CoC standard.

13. Issuance of Certificates

Certification Body Program Manager/Administrator who oversees the CSI Certification Program governs the issuance of the assessment certificate to an applicant. The certificate will be in the standard's approved format and include following:

a) Certification Body's name, address and accreditation;

b) Accreditation Body's name (when applicable);

c) Standard Holder's name;

d) Applicant name;

e) Applicant mailing address;

f) Chain of Custody certification standard and scope;

g) Seafood product categories covered by the certificate, stating the fish species;

h) Assessment date;

i) Certification Issue date;

j) Certification Expiry date;

k) Chain of Custody Certificate Number (e.g., CSI-S-####) and old number if superseded format; and

l) Authorizing signature.

The Certification Body shall retain possession of the certificate at all times.

If any substantial changes occur to the applicant's premises or products, the applicant must provide immediate written notification of these changes to the Certification Body. Changes to the premises or products could result in the suspension or withdrawal of the certification.

14. Applicant Records

Within thirty calendar days of the Certification Committee meeting, the Certification Body will review the applicant's file to verify that all required documents have been placed in the file.

For a period of five years, the Certification Body and Applicant will each retain copies of the following documents in either hard copy or electronic file format:

a) Application form;

b) Site-visit confirmation letter;

c) Site-visit schedule;

d) Assessor authorization to conduct assessment, as applicable;

e) Assessment report forms;

f) Letters detailing non-conformance, as applicable;

g) Applicant responses on corrective actions taken;

h) Assessor confirmation of resolution of non-conformances;

i) Minutes of certification meetings and reviewers comments;

j) Applicant notifications of certification decision;

k) Final Assessment Report; and

l) Certification and acknowledgement of receipt.

As a part of annual audits, the assessors will schedule and conduct a review of the applicant's files.

Appendix 1. Procedural Requirements for UPOS Assessment

Key terms related to UPOS assessment are defined in the "Definitions" section of the CSI Unified CoC Standard.

The process for certification of UPOS organizations, including the eight stages of UPOS assessment, are described in detail in the UPOS Module.

In general, the procedural requirements for UPOS assessment are the same as the default procedural requirements set out in Sections 1-14 of Procedure 4. Exceptions for UPOS are noted here in Appendix 1. The main areas where UPOS diverges from default procedural requirements are in relation to:

- COC certificate registration number;
- Audit planning to accommodate site number and risk assessment;
- Classification and handling of non-conformities;
- Certificate content; and
- Certification records.

The requirements of Appendix 1 are mandatory for CBs performing UPOS assessments. If a conflict should arise between the procedural requirements of Appendix 1 and those of Sections 1-14 of Procedure 4, the CB shall conform with the requirements of Appendix 1.

For ease of identification, brackets and italics are used here to indicate text insertions while strikethroughs are used to indicate text deletions relative to the requirements of Procedure 4.

Section 1 – Purpose and Scope

(Unchanged)

Section 2 – Inquiries and Requests for Application

The original paragraph in section 2 is retained. A new paragraph is inserted below it which reads as follows.

[UPOS Organizations are also subject to additional application requirements: The central office will be required to have a contractual agreement with the CB to ensure that the CSI Unified Chain of Custody Standard and UPOS Module are fully implemented and enforced at all of the participating sites.]

Section 3 – Application Processing

The third sentence of Section 3 shall be modified as follows:

"On receipt of an application, the Certification Body ~~will~~ *shall* record the date of receipt and review the application to *[confirm which certification option is requested and to]* establish an appropriate assessment plan, including the timeframe for the assessment, based on the nature, size, complexity, and technical resources of the applicant's operations and the associated risks."

Section 4 – Assessment Personnel and Scheduling

(Unchanged)

Section 5 – Assessment Standards and Scope

Section 5 retains the two original paragraphs and the following text is inserted below them.

[Scope of certification of UPOS Organizations

- *the scope of certification applies only to those sites that have been notified to the CB, are included in the site register submitted to the CB by the Organization, and have been deemed eligible for inspection.*
- *sites identified on the site register may trade products with claims of being certified.*

Section 6 – Pre-assessment Process

The original paragraph of Section 6 is retained (as shown below) and the section is expanded to include additional text and tables as indicated.

"As part of the pre-assessment process, applicants shall submit details of the traceability systems used on their site and the components and operation of their quality management systems to the Certification Body to support a pre-evaluation of the operation before the assessment to determine the most appropriate audit plan for the applicant to protect the integrity of the certificated CSI species."

[begin inserted text and tables, Section 6]

Additional requirements for Unpackaged at Point-of-Sale Organizations

The audit plan considers the number of sites to be included within their scope of certification and their respective risk according to the activities conducted at each.

The CB shall inform the client that for applicants with multiple sites, the central office, operations sites (where relevant) and a sample of unpackaged at point-of-sale sites will be audited. The number of selected sites will be chosen based on Table 1. For Surveillance and Recertification Audits, the number of sites sampled may be lowered based on the risk assessment score (Table 2). Any client with at least three Yes/Low Risk responses in Table 2, is eligible for Low Risk sampling during Surveillance and Recertification audits.

Table 1: Number of sites to be audited for UPOS organizations according to audit type (initial, surveillance or recertification) and risk level (normal risk or low risk).

	Number of sites to be audited		
	Initial Audit	Surveillance or Recertification Audit	
Total number of sites	(risk unspec.)	Normal Risk	Low Risk
1 to 3	1	1	1

4 to 6	2	2	1
7 to 16	3	3	2
17 to 49	4	4	2
50 to 100	5	5	3
101 to 144	6	6	4
145 to 196	7	7	5
197 to 256	8	8	5
257 to 324	9	9	6
325 to 400	10	10	6
401 to 484	11	11	6
485 to 576	12	12	7
577 to 676	13	13	7
677 to 784	14	14	8
785 to 900	15	15	8
901 to 1024	16	16	8
Over 1024	Square Root multiplied by 0.5 rounded up	Square Root multiplied by 0.5 rounded up	Square Root multiplied by 0.25 rounded up

Additionally, operations sites that carry out processing, repacking or labeling activities of certified products shall be audited in addition to the sample size determined by Table 1. Where the UPOS has operations sites involved in only storage or distribution, at least one of them shall be audited in addition to the number of UPOS sites sampled during the initial audit and each subsequent recertification audit.

Table 2. Risk assessment of UPOS organizations for surveillance and recertification audits.

Risk Criteria	Mitigating Factor	Low Risk	Normal Risk
A. Centralized oversight	Does the central office conduct internal audits against the Unified UPOS certification scheme at every site and maintain records of those audits?	Yes	No
B. Performance consistency across sites	Did the client demonstrate reasonable conformity with the standard at the previous audit (i.e., no Major nonconformities were raised)?	Yes	No
C. Site Level Training	Does the organization have a documented method for measuring the effectiveness of site level training?	Yes	No
D. Internal Traceability Control	Does the Applicant test the efficacy of their batch control and traceability system through a thorough documented	Yes	No

	traceability challenge (backwards and forwards) and a quantity check/ mass balance?		
E. Ability to address problems with internal processes	Does the Applicant have a documented procedure for handling non-conformities to this standard?	Yes	No

[end inserted text and tables, Section 6]

Section 7 – Assessment Process

The original table in Subsection 7.3 is retained (not shown) and the subsection is expanded to include additional text as indicated below.

[Begin inserted text, Subsection 7.3]

Non-conformity Classification

Minor non-conformities: raised during surveillance or re-certification audits (or any other time after initial certification) shall be closed within 28 days of detection.

If the minor non-conformity is not corrected within 28-day maximum timeframe, the non-conformity shall be re-graded as a major non-conformity; and resultant conditions apply.

Major non-conformities: raised during surveillance or re-certification audits (or any other time after initial certification) shall be closed or downgraded within 28 days of detection.

If the major non-conformity is not addressed within the 28-day maximum timeframe, suspension or withdrawal of the certificate and a full re-audit may be initiated.

Suspension: raised during surveillance or re-certification audits (or any other time after initial certification). Cause for suspension includes, among other things, the selling of non-certified product as certified.

Non-conformities at UPOS Organizations

For UPOS clients, all nonconformities shall be raised against the central office, even if detected at site level.

For UPOS certified clients, if noncertified product is found to be identified as certified at the point-of-sale or serving to the final consumer nonconformances shall be considered:

- *As a major non-conformity if the auditor determines that the cause of the mislabeling was due to an individual not following established internal procedures.*
- *As a cause for suspension in all other cases.*

For UPOS clients, where major non-conformities are detected at a surveillance or re-certification audit, and the certificate is not suspended, the CB shall carry out remote follow-up site audits within 90 days of the original audit.

- *Follow-up site audits shall include at a minimum a review of the non-conformity, a traceability test, and personnel interviews, but do not need to cover the full Unified Chain of Custody Standard and UPOS Module.*
- *The audited sites shall include at least each site where a major non-conformity was detected, and:*
    - *For clients with 6 or more sites, 1 additional site should be audited.*
    - *More sites may be audited where the CB deems it necessary.*
- *Where an additional major non-conformity is raised against the same clause during the follow-up audits, the CB shall suspend the certificate.*

[End inserted text, Subsection 7.3]

Section 8 – Customer Notification of Traceability and Legality Issues

(Unchanged)

Section 9 – Annual Surveillance Audit Scheduling

(Unchanged)

Section 10 – Issuance of Assessment Reports

(Unchanged)

Section 11 – Non-conformance Follow-up

The three original paragraphs of Section 11 are retained. A new provision for UPOS organizations is inserted below the original text which reads as follows.

*[**Additional conditions for UPOS Organizations***

If any site has a non-conformity during an initial audit, certification shall be denied to all sites included under the scope of certification by the Applicant pending satisfactory corrective action.]

Section 12 – Final Assessment Report

(Unchanged)

Section 13 – Issuance of Certificates

For UPOS organizations, the list of information that shall be included on COC certificates (items 'a' to 'l' in Section 13) is expanded to include item "m" as shown below.

[m. a register of all sites that may trade products with claims of being certified.]

Section 14 – Applicant Records

The list of audit records to be maintained by the CB (items 'a' through 'l' in Section 14) shall be expanded for UPOS assessments to include two additional types of records:

[m. risk assessments of UPOS organizations; and

n. calculation of the number of sites to be audited for UPOS organizations.]