

CSI Fishery Assessment Methodology

Version 1.0

Public Comment Draft

October 15, 2026



Responsibility for these Requirements

The Board of Certified Seafood International (CSI) is responsible for the *Fishery Assessment Methodology*. The CSI Board will review the contents of this document on an ongoing basis.

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Purpose

To set out the methodology for use by independent Certification Bodies (CBs) when assessing the conformity of fisheries with the CSI Fishery Management Standard.

Background

Certified Seafood International (CSI) delivers a competitive third-party certification program with global reach, and chain of custody with the ability to identify harvest origin on the eco-label. In 2025, the North American RFM Program transitioned to Certified Seafood International (CSI). Benchmarked by the Global Sustainable Seafood Initiative (GSSI), CSI audits fisheries management against a clear and rigorous Fishery Management Standard grounded in the globally recognized guidance of the United Nations Food and Agriculture Organization (FAO).

Credibility: CSI is a rigorous program benchmarked by GSSI. Our fisheries are certified against a standard grounded in the internationally recognized principles of the UN FAO. These FAO criteria were developed in partnership with the world's leading fishery biologists, environmental organizations, and fishery managers from 70 countries.

Affordability: Credible certification should not impose steep cost burdens on the seafood sector. The clarity of our standard, together with a commitment to minimizing program overhead, is delivering value for money and removing cost burdens from seafood supply chains. Information regarding the fees associated with utilizing the CSI Ecolabel and Claim can be found on the CSI [website](#). Affordability will remain an overriding objective of CSI.

Transparency: CSI believes deeply in the fishing communities that harvest wild-capture seafood, and we want to share their stories with the world. Our program provides more than a generic stamp of approval. We offer a choice to identify harvest origin on the CSI label; and we provide an online platform to communicate a wider range of information about certified fisheries.

Improvement: By recognizing fisheries that meet a clear set of established management requirements, CSI encourages more fisheries to engage and improve. We believe that a stable standard, focused on fisheries management and based on internationally recognized UN principles, provides clarity and consistency that is vital for fisheries striving for certification.

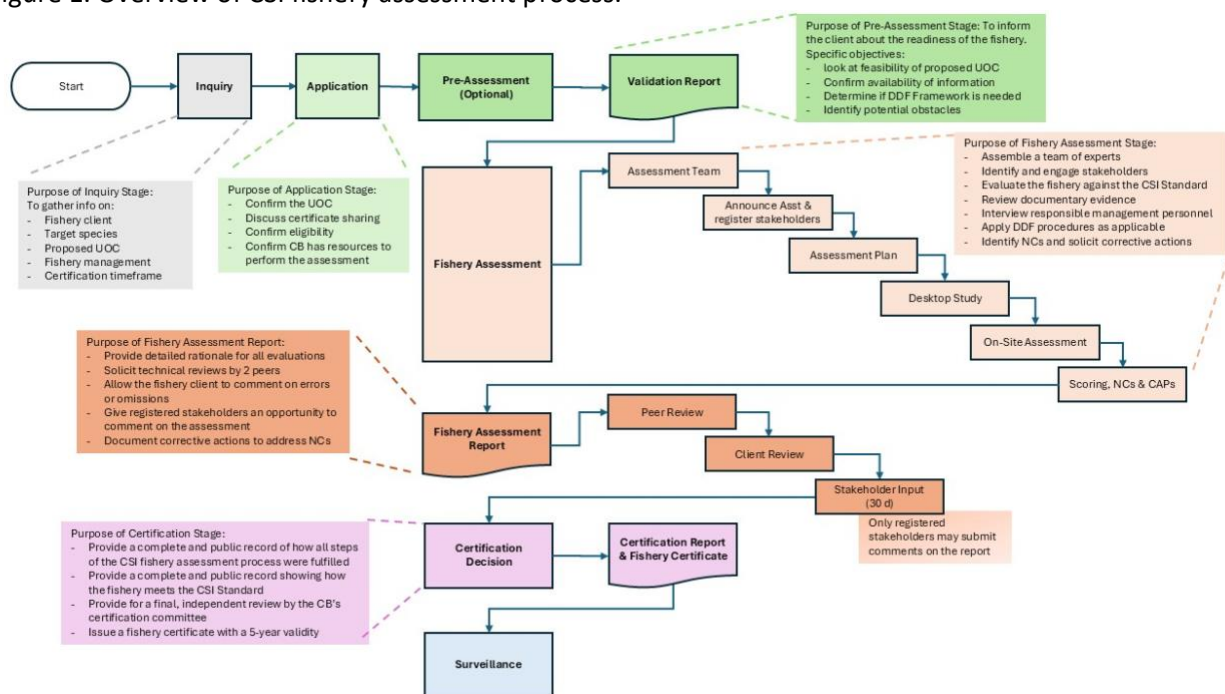
More information about CSI is available on our website: www.CSI.Fisheries.org

Contact CSI at: info@csicertified.org

Introduction

Development of this fishery assessment methodology drew heavily from the work of the Certified Seafood Collaborative and Iceland Responsible Fisheries, notably [RFM Procedure 2](#)¹ and the [IRF Standard](#). An overview of the CSI Fishery Assessment Methodology (FAM) is shown in Figure 1.

Figure 1. Overview of CSI fishery assessment process.



In addition to fishery assessment, the FAM addresses a host of related activities that are essential for a robust and credible fishery certification program. These topics include pre-assessment, surveillance, certification file review, certificate transfer, certificate sharing, complaints and appeals, certificate suspension and withdrawal, certificate extension, unit of certification (UOC) amendment, and competency requirements for fishery assessors.

Scope

This *Fishery Assessment Methodology* sets out requirements for CBs to follow when assessing the conformity of a fishery with the requirements of the CSI Fishery Management Standard. The scope of

¹ RFM Procedure 2: Application to Certification Procedures for the RFM Fishery Standard Version 2.2. Responsible Fisheries Management (RFM) Certification Program. October 2024. Certified Seafood Collaborative (CSC). <https://rfmcertification.org/wp-content/uploads/2024/10/Procedure-2-Oct-2024-Final.pdf>

the methodology extends to all the major processes required for certification of wild-capture fisheries including: inquiry; application; pre-assessment; fishery assessment; fishery assessment reporting; certification decision-making; certificate issue; surveillance; re-assessment; and re-certification. Additional processes for managing fishery certificates are described as well. The processes described herein apply to CSI-approved CBs as well as applicant CBs.

Independent Accreditation Bodies (ABs) may use the requirements of the *Fishery Assessment Methodology* to verify that the methods used by a CB to assess whether fisheries are in conformity with the requirements of the CSI Certification Program.

Normative References

Normative Documents

CSI Fishery Management Standard, Version 3.0. Certified Seafood International. Draft, October 15, 2026.

CSI Glossary of Terms, Version 1.0. Certified Seafood International. Draft, October 15, 2026.

Unified Chain of Custody Standard, Version 2.6. Certified Seafood International and Iceland RFM, September 2025. <https://csicertified.org/chain-of-custody/standard/>

ISO/IEC 17065:2012 Conformity assessment -- Requirements for bodies certifying products, processes and services. <https://www.iso.org/standard/46568.html>

Guidance Documents

This *CSI Fishery Assessment Methodology* presents guidance for CBs (shown in gray text boxes) alongside mandatory certification requirements. Although CBs should consider guidance to be non-mandatory recommendations from the Scheme Owner, it is generally expected that CBs will apply guidance by default unless there is a reasonable justification for not doing so. In such cases, the CB shall retain written justification for deviating from applicable guidance.

Other guidance materials which are incorporated by reference include:

CSI Guidance and Evaluation Parameters for Fishery Conformity Assessment. Version 3.0. Certified Seafood International. Draft, October 15, 2026.

ISO 19011:2011(E) Guidelines for auditing management systems.
<https://www.iso.org/standard/50675.html>

FAO. 2009. Guidelines for the Ecolabelling of Fish and Fishery Products from Marine Capture Fisheries. Revision 1. Rome, FAO. 2009. 97p. <https://www.fao.org/3/i1119t/i1119t.pdf>

Supporting Documents

The *Fishery Assessment Methodology* also refers to supporting documents (e.g., forms, templates). Supporting documents are intended to facilitate consistent application of the methodology by CBs. Where indicated, their use is mandatory. The list of supporting documents includes the following:

- Application Form
- CSI Pre-Assessment Report Template
- CSI Fishery Assessment Report Template
- Peer Review Report Template
- CSI Surveillance Report Template

Terms and Definitions

All terms are defined in the *CSI Glossary of Terms*. A list of acronyms is provided in Appendix 1.

Methodology

1 Inquiry

Purpose of Inquiry

The purpose of the inquiry stage is for the CB to meet and become familiar with a prospective fishery client, to gather basic information on the target species and proposed UOC, and to get a broad overview of the fishery management system. It is also a chance for the fishery client to ask questions about the CSI fishery management certification process and to discuss costs and expectations for certification timeframe.

- 1.1 Upon receiving an inquiry about CSI fishery management certification, the CB shall provide the inquiring party with an overview of the CSI fishery assessment process.
- 1.2 The CB shall ask the inquiring party to provide details relevant to a fishery assessment such as:
 - a) An overview of the fishery client group and its relation to the fishery;
 - b) The main components of a UOC (target stock(s), fishing methods/gear types, geographic region, and principal management authority); and
 - c) A general description of the fishery management system.
- 1.3 The CB shall inform the inquiring party about the anticipated lead time to initiate an assessment and the probable timeframe for completing a CSI fishery assessment.
- 1.4 If the party expresses continued interest in pursuing certification, the CB shall provide the party with an application package which, at a minimum, shall include:
 - a) An Application Form;
 - b) A copy of the CSI Fishery Management Standard;
 - c) An estimate of assessment costs; and
 - d) A copy of the CB's rules and regulations including, as may be applicable, a description of contractual arrangements.

Guidance on Contractual Arrangements for Applicants

In later stages of the fishery assessment process (e.g., at the point where a full fishery assessment is initiated), CSI requires the CB to have in place a formal agreement with the fishery client for the provision of certification services (see Section 4.1). However, in earlier stages (e.g., at application), CSI allows the CB discretion over how to structure its contractual arrangements to cover the application review process and, if applicable, pre-assessment.

- 1.5 The CB shall inform the inquiring party about the primary terms of application as set out in the Application Form.

2 Application

Purpose of Application

The purpose of the application stage is to ensure that prospective fishery clients are informed about salient aspects of the certification process (e.g., eligibility requirements, certificate sharing) and to secure their consent to observe these processes by signing an application form.

During the application stage, the CB performs an internal review to ensure it has sufficient resources and personnel to conduct the fishery assessment. The CB also ensures that sufficient information has been collected to define the UOC and to determine whether the fishery is based on an introduced species or utilizes fishery enhancement.

- 2.1 Upon receipt of a completed Application Form, the CB shall review the submission to ensure the prospective fishery client has provided the following:
- a) All information requested in the Application Form;
 - b) Acknowledgement of CSI eligibility requirements per clause 2.3 below; and
 - c) A signature indicating the fishery client's consent to abide by requirements for certificate sharing (Appendix 4).
- 2.2 Prior to accepting an application, the CB shall review its internal resources to ensure it has the capacity to carry out an assessment of the subject fishery.
- 2.3 The CB shall request evidence or attestations from the applicant to show the UOC does not engage in disqualifying activities that would make the fishery ineligible for certification. Disqualifying activities are:
- a) the use of explosives, poisons, or comparable destructive fishing practices;
 - b) forced labor or other abusive labor practices;
 - c) knowing or willful engagement in illegal, unreported, and unregulated (IUU) fishing; or
 - d) illegal shark finning.
- 2.4 The CB shall collect sufficient information during the application stage to confirm the scope of certification being sought and to clearly define the UOC. The UOC shall be defined by:
- a) The target stock of the fishery;
 - b) The gear type(s) used in the fishery;

- c) The geographical area over which the fishery harvests the target stock(s); and
- d) Those organizations involved in management of the fishery for the target stock(s).

NOTE: Appendix 5 gives guidelines for UOC structure.

- 2.5 The CB shall ask the applicant to identify the fisheries management organizations with responsibility for the fishery.
- 2.6 The CB shall check whether the applicant is eligible to join an existing CSI fishery certificate via a certificate sharing arrangement. If so, the CB shall notify the applicant and CSI of this fact.
- 2.7 The CB shall solicit information to determine if enhancement activities are relevant to the fishery under consideration.
- 2.8 If fishery enhancement is involved, the CB shall verify that the applicant fishery meets CSI scoping criteria for enhanced fisheries (Table 1).

Table 1. Scoping criteria for enhanced fisheries.

No.	Enhanced Fisheries Scoping Criteria
1	The species shall be native to the fishery's geographic area or if an historically introduced species, it shall also meet eligibility requirements for introduced species.
2	There shall be a natural reproductive component of the target stock.
3	Growth during the post-release phase shall be based upon food supply from the natural environment.
4	<p>The production system shall operate without substantial² supplemental feeding.</p> <ul style="list-style-type: none"> a) For stocks held before adulthood: supplemental feeding is "substantial" if food is provided to the animals after they attain 10% or more of average adult body size. b) For stocks held as adults: feeding is "substantial" if food is provided during a period when the animals show appreciable growth (i.e., > 5% increase relative to size at capture).

- 2.9 For an enhanced fishery, in addition to assessment of all "default" requirements of the CSI Fishery Management Standard, the CB shall expand assessment scope to encompass all

² Supplemental feeding means the provision of food beyond that which is freely available to the animal in the natural environment. Substantial supplemental feeding will cause most aquaculture operations and many ocean ranching operations to be ineligible for CSI certification.

applicable CSI Requirements for fishery enhancement as set out in the Enhanced Fishery Module (EFM).

- 2.10 Use of the EFM should follow from a consideration of relevant issues as illustrated in the decision tree in Figure 2.

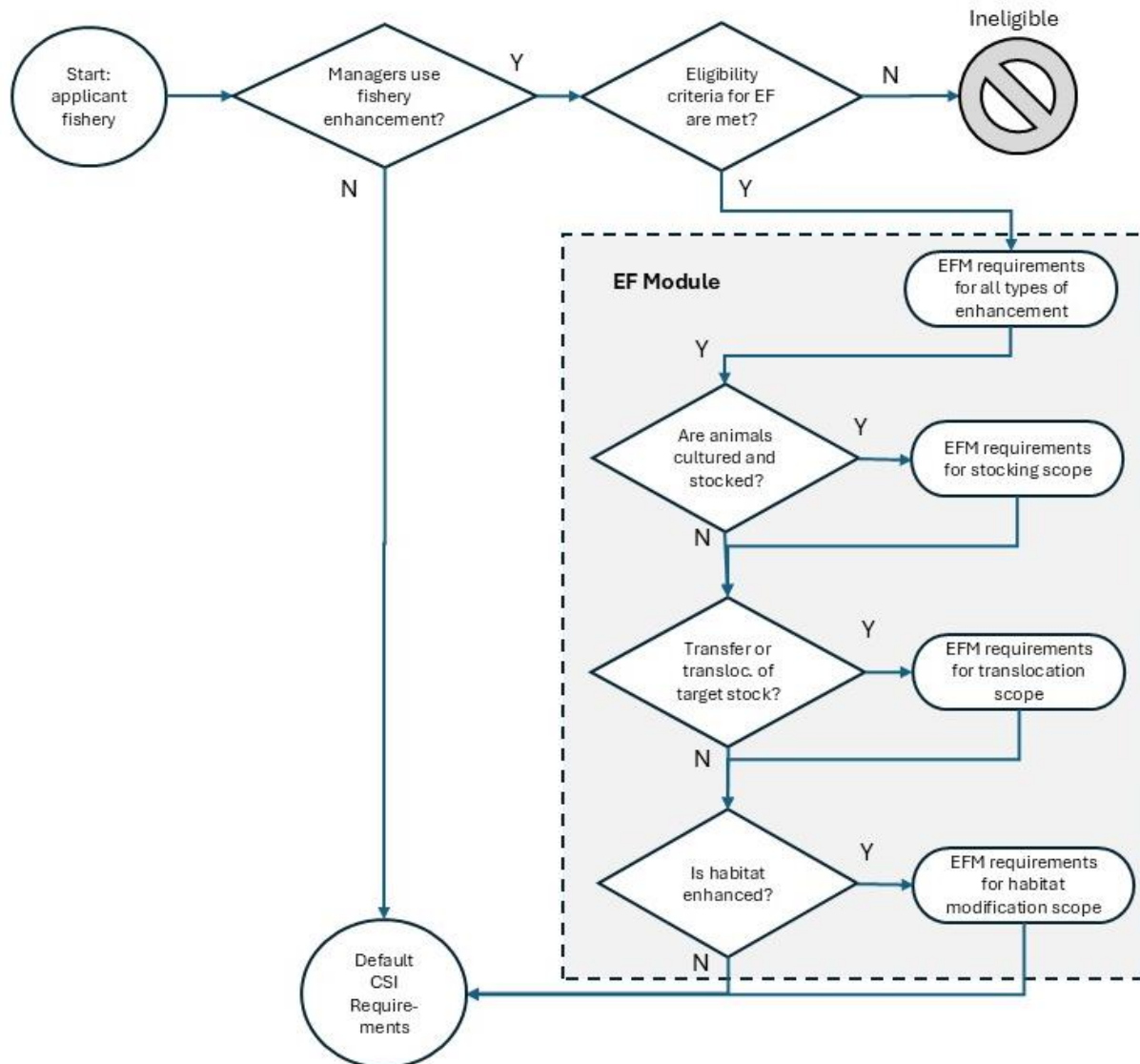


Figure 2. Decision tree for enhanced fisheries and the use of the EFM.

- 2.11 The CB shall solicit information to determine if the species is native to the fishery’s geographic area or, if an introduced species, whether it has subsequently become established as a self-sustaining part of the natural ecosystem.

2.12 To determine whether a fishery targeting an introduced species is eligible for CSI certification, the CB shall confirm the following criteria are met for the introduced species:

- a) Historic: The introduction occurred before 1995³;
- b) Self-sustaining: There is no ongoing translocation of the introduced species; and
- c) Non-reversible: The introduction is effectively no longer reversible because:
 - i. The introduced species now has a large population size in the new area; and
 - ii. Eradication would entail significant ecological or socioeconomic impacts.

³ Year the FAO Code of Conduct for Responsible Fisheries was published.

3 Pre-Assessment

Purpose of Pre-Assessment

The purpose of the pre-assessment stage is to inform a prospective client about the fishery's state of preparedness to undergo a fishery assessment. The specific objectives of pre-assessment are to evaluate the feasibility of the proposed UOC, to confirm the availability of information to support a fishery assessment, to determine if data limitations will trigger use of the Data-Limited Fishery (DLF) Tool, and to identify potential obstacles to attaining certification (i.e., critical non-conformities NCs).

In most cases⁴, undergoing pre-assessment is optional. Nonetheless, the Scheme Owner strongly recommends that applicants undergo a pre-assessment because it will give them a clearer picture of their fishery's state of readiness for a fishery assessment, and it may bring to light important issues that the applicant is unaware of.

The outcome of pre-assessment is documented in a Pre-Assessment Report. The Pre-Assessment Report is not intended to capture or analyze all the information needed for a fishery assessment. Rather, it is meant to validate the supposition that sufficient information is available to undertake and complete a fishery assessment. In addition, information collected during a Pre-Assessment may certainly be utilized in a fishery assessment (see Section 4.2).

Although the pre-assessment process is intended to identify potential obstacles to attaining certification (e.g., critical NCs), it is possible for significant gaps to go undetected during a pre-assessment. For this reason, the assessment team has discretion to raise a critical NC at any stage of a fishery assessment.

3.1 General

3.1.1 The CB shall give the applicant an overview of the pre-assessment process, specifically:

- a) Purpose – to inform a prospective client about the fishery's state of preparedness to undergo a fishery assessment against the CSI Fishery Management Standard.
- b) Specific objectives – to evaluate the feasibility of the proposed UOC, to confirm the availability of information to support a fishery assessment, to determine if data limitations will necessitate the use of the DLF Tool, and to identify potential obstacles to attaining certification (i.e., critical NCs);
- c) Scope – review documentation relating to the fishery and, if necessary, meet with key representatives and managers of the fishery; and
- d) Confidentiality – results of pre-assessment are confidential between CB and fishery client.

⁴ The exception is data-limited fisheries (DLFs) which require use of the DLF Tool. For such fisheries, pre-assessment is a mandatory step.

- 3.1.2 The CB shall inform the applicant that pre-assessment is an optional stage (except for data-limited fisheries which require the use of the DLF Tool; see Appendix 2) and that the fishery client may opt to proceed directly to a fishery assessment.
- 3.1.3 The CB shall ensure that any guidance given to a fishery client during pre-assessment is in conformity with ISO 17065.

3.2 Assessors for Pre-Assessment

- 3.2.1 The CB shall appoint an assessor to carry out pre-assessment of the fishery. The assessor shall have the following competencies:
 - a) Training and experience in the CSI Certification Program;
 - b) An understanding of the key features of the applicant fishery in terms of the biology of the target stock, fishing gears used, geographic range, and key management agencies; and
 - c) Proficiency in English.
- 3.2.2 The CB shall appoint additional assessors to a pre-assessment ‘team’ as necessary to ensure that there is sufficient technical expertise for the scale and complexity of the fishery under consideration.

Guidance on the Size of the Pre-Assessment Team

CBs may choose to appoint multiple assessors to carry out the pre-assessment (i.e., a pre-assessment team). The size of the team should be proportionate to the scale and complexity of the fishery under consideration and its fishery management system (FMS). Competency profiles of assessors should reflect the aforementioned considerations as well. Typically, a pre-assessment of a large-scale fishery harvesting a shared (i.e., transboundary) target stock would require a team of at least two assessors. On the other hand, a relatively small-scale fishery operating exclusively within national waters might be pre-assessed by a one-person team provided the assessor has the relevant technical knowledge and experience for the assignment.

- 3.2.3 In line with 3.1.3, the CB shall take steps to ensure the impartiality of the assessors assigned to undertake pre-assessments. This may involve requiring appointees to reveal any situation known to them that may present them or the CB with a conflict of interest.

3.3 Pre-Assessment Method

- 3.3.1 A pre-assessment shall include, but is not limited to, a substantive review of relevant documentation for the subject fishery.
- 3.3.2 The assessor(s) shall decide which topics to evaluate during the pre-assessment. At a minimum, a pre-assessment shall cover the following areas:

- a) General and historical background information on the fishery;
 - b) Principal management authority, governance, policy objectives and relevant regulations;
 - c) Information on the target stock(s) including recent landings, previous stock assessments, and current stock status;
 - d) Information on enforcement, compliance, and sanctions;
 - e) Overview of the FMS including its research capacity and relevant CMMs;
 - f) Management of adverse effects of the fishery on NT species, ETP species, habitats and ecosystems;
 - g) Proposed UOC structure(see Appendix 5 for guidelines);
 - h) Other fisheries in the region which are not part of the UOC but may interact with the fishery under consideration;
 - i) External factors (such as environmental issues) that may affect the fishery and its management;
 - j) A list of key stakeholders and their interest in or relationship with the fishery; and
 - k) Information about traceability, risks and the entry of certified fishery products into supply chains.
- 3.3.3 Pre-assessments shall be conducted on-site if doing so is essential to fulfilling the objectives of the pre-assessment, or the assessor determines that a site visit is necessary based on the scale and intensity (S&I) of the fishery.
- 3.3.4 In addition to 3.3.3, an on-site pre-assessment may be justified if the assessor deems it necessary to:
- a) Evaluate the feasibility of the proposed UOC structure;
 - b) Confirm the availability of information to support a fishery assessment;
 - c) Determine if data limitations will trigger use of the DLF Tool; and/or
 - d) Identify potential obstacles to attaining certification.
- 3.3.5 In advance of an on-site pre-assessment, the assessor(s) shall consult with the fishery client and relevant fishery management representatives to develop a site visit plan with a schedule of meetings. The plan shall be circulated to participants at least 10 days before the on-site visit.

- 3.3.6 The assessor may use on-site meetings as an opportunity to inform the fishery client and stakeholders about the CSI fishery assessment process, assessment timelines, and CB point of contact.

3.4 Pre-Assessment Report

- 3.4.1 The assessor(s) shall prepare a Pre-Assessment Report summarizing the findings from the pre-assessment, which addresses all subject areas listed in clause 3.3.2 above. In addition, the Pre-Assessment Report shall explicitly state the assessor's recommendations regarding:
- a) The feasibility of the proposed structure of the UOC;
 - b) The sufficiency of available data to support a fishery assessment;
 - c) The use of the DLF Tool (Appendix 2) in the case of data limitations;
 - d) Potential obstacles to the fishery attaining certification (if any were identified) including areas of deficiency that may trigger a critical NC (see Section 4.9); and
 - e) The ability of the applicant to represent the fishery being proposed for certification.
- 3.4.2 The report in 3.4.1 shall be prepared using the CSI Pre-Assessment Report Template.
- 3.4.3 The Pre-Assessment Report shall contain a confidentiality statement indicating that the contents of the report are confidential and will not be disclosed by the CB without written consent of the fishery client.
- 3.4.4 The CB's Program Manager shall review the Pre-Assessment Report and, if necessary, seek clarification from the assessor(s) before accepting the report as final. Once finalized, the CB shall send the Pre-Assessment Report to the fishery client.
- 3.4.5 If after reviewing the Pre-Assessment Report the fishery client has outstanding questions or concerns about the feasibility of a fishery assessment, the CB shall attempt to clarify these matters before proceeding.
- 3.4.6 Notwithstanding the outcome of the dialog envisioned in clause 3.4.4, the CB shall not proceed with a fishery assessment unless and until the CB is satisfied that it is feasible to do so.

4 Fishery Assessment

Purpose of Fishery Assessment

The purpose of the fishery assessment stage is to assemble a team of suitably qualified experts to assess the fishery against requirements of the CSI Fishery Management Standard in accordance with a detailed assessment plan. A fishery assessment includes a desktop review of relevant literature as well as on-site meetings between the assessment team and fishery representatives, fishery managers, scientists, and

other stakeholders. During this stage, relevant stakeholders are identified and, if they choose, register to have an opportunity to input during the assessment process. If applicable, a special procedure for data-limited fisheries - the DLF Tool - may also be applied during this stage. Near the conclusion of the fishery assessment, the assessment team identifies areas where the fishery does not conform with the Standard and solicits corrective action plans from the fishery client. Results of the fishery assessment are compiled in a Fishery Assessment Report, which is then reviewed by independent technical experts before being published for stakeholder comment.

4.1 General

- 4.1.1 The objective of the fishery assessment shall be to evaluate and confirm that the fishery under consideration meets the requirements of the CSI Fishery Management Standard across the entire proposed scope of certification.
- 4.1.2 The CB's procedures for conducting CSI fishery assessments should generally align with guidelines presented in ISO 19011:2018(E) for the auditing of management systems.
- 4.1.3 In line with ISO/IEC 17065:2012, the CB shall have in place a legally enforceable agreement for the provision of certification services to the fishery client (see Section 5.4).

4.2 Assessment Team

- 4.2.1 The CB shall appoint an assessment team to assess the fishery against the CSI Fishery Management Standard.
- 4.2.2 A lead assessor shall be appointed to the team. The lead assessor shall oversee completion of the fishery assessment in accordance with the requirements of the CSI Fishery Assessment Methodology.
- 4.2.3 The lead assessor shall:
 - a) Fulfill the competency requirements for a fishery lead assessor as set out in Appendix 3;
 - b) Demonstrate a good understanding of the CSI Fishery Assessment Methodology; and
 - c) Possess the relevant technical expertise in one or more of the areas in clause 4.2.4.
- 4.2.4 The CB shall assemble a team of assessors who, collectively, demonstrate technical expertise across each of the following areas:
 - a) **Fish stock assessment** — at least five (5) years of experience in the production or review of stock assessment methods relevant for the fishery under assessment;
 - b) **Biology and ecology of the target stock** — at least five (5) years of experience in the biology and ecology of the target stock or a similar species;

- c) **Fishing impacts on aquatic ecosystems** — at least five (5) years of experience in research, policy analysis, or management of fisheries impacts on aquatic ecosystems and marine conservation biology;
 - d) **Fishery management and operations** — at least ten (10) years of experience as a practicing fishery or aquatic natural resource manager, or as a fishery or aquatic natural resource management analyst.
 - e) **Fishery-specific management system** — a good understanding of the type of management system currently used to manage the fishery under consideration;
 - f) **Local context** — a current understanding of the country, language, and local fishery context sufficient to support meaningful assessment of the fishery; and
 - g) **Auditing principles and scheme knowledge** — prior auditing experience, general knowledge of the CSI Certification Program, an understanding of seafood traceability and chain of custody (CoC) issues, and familiarity with the Unified CoC Standard.
- 4.2.5 The CB shall review the expertise of the assessment team to confirm that, collectively, the team meets the requirements set out in clause 4.2.4.
- 4.2.6 In line with ISO/IEC 17065, the CB shall take steps to ensure the impartiality of its assessors. This may involve requiring assessors to reveal any situation known to them that can present them or the CB with a conflict of interest.
- 4.2.7 The CB shall secure a contract with each assessor for their role in the fishery assessment.
- 4.2.8 The lead assessor shall ensure that each assessment team member is briefed on his or her specific role in the fishery assessment.
- 4.2.9 The CB shall ensure that each assessor receives training in relevant aspects of the CSI Certification Program, including:
- a) The aims and objectives of the CSI Certification Program;
 - b) The CSI Fishery Management Standard and supporting guidance; and
 - c) The CSI Fishery Assessment Methodology.
- 4.2.10 The CB shall ensure that each assessor is familiar with, and provided access to, the FAO instruments which are central to the CSI Certification Program, including:
- a) The FAO Code of Conduct for Responsible Fisheries;
 - b) The FAO Guidelines for the Eco-labelling of Fish and Fishery Products from Marine Capture Fisheries; and

- c) Other FAO instruments as the CB may deem relevant to the fishery under assessment.

4.2.11 In addition to 4.2.10, the CB shall provide each assessor with the following documents:

- a) CSI Fishery Management Standard;
- b) CSI Guidance and Evaluation Parameters for Fishery Conformity Assessment;
- c) Relevant training materials (e.g., CSI PowerPoint training deck);
- d) Pre-Assessment Report for the fishery under assessment (if available); and
- e) Checklists, report templates, and other documents to support the fishery assessment.

4.2.12 The CB shall prepare an announcement identifying all members of the assessment team, indicating their role in the fishery assessment, and giving a brief account of their relevant expertise.

4.2.13 Before publicly announcing the team, the CB shall give the fishery client an opportunity to review the composition of the assessment team and, if applicable, to contest the individuals appointed.

4.2.14 The CB shall submit to CSI the announcement described in clause 4.2.12 for publication on the CSI website.

NOTE: The CB may combine the announcement of the assessment team (4.2.12) with the announcement of the fishery assessment (4.3.1).

4.3 Announcement of Fishery Assessment and Registration of Stakeholders

4.3.1 Within ten (10) days of confirming the assessment team, the CB shall announce the commencement of the fishery assessment.

4.3.2 The announcement in 4.3.1 shall specify the proposed UOC or UOCs for the fishery assessment.

4.3.3 The CB shall include in the announcement a request to register interested parties as stakeholders for the fishery assessment.

4.3.4 The CB shall keep a list of registered stakeholders to include the following information:

- a) Name of organization, main contact person, and contact details;
- b) Relationship to the fishery; and
- c) Areas of interest or issues of special concern.

- 4.3.5 The CB shall communicate with registered stakeholders during the fishery assessment to include:
- a) Sending registered stakeholders announcements about the progress of the fishery assessment and opportunities to share information with the assessment team (e.g., during on-site meetings); and
 - b) Notifying registered stakeholders when the Fishery Assessment Report has been made available for stakeholder review and comment (see clause 4.14.1).
- 4.3.6 The CB shall solicit input from registered stakeholders throughout the fishery assessment and also during subsequent surveillance audits or re-assessments (Section 6).

4.4 Assessment Plan

- 4.4.1 At commencement of the fishery assessment, the lead assessor shall prepare an assessment plan. The assessment plan shall be developed in consultation with the assessment team.
- 4.4.2 The assessment plan shall identify the main processes by which the team will assess the fishery against requirements of the CSI Fishery Management Standard, including:
- a) Desktop review (conducted off-site);
 - b) On-site assessment; and
 - c) Solicitation of input from registered stakeholders and other parties.
- 4.4.3 In developing the assessment plan, the team shall conduct an initial review of information from the fishery client or otherwise available to the team (e.g., Pre-Assessment Report) about the current state of the fishery and its history, science, management and oversight.
- 4.4.4 The team shall use the initial review of information in clause 4.4.3 to apportion time in the assessment plan between on-site assessment activities and off-site desktop reviews.
- 4.4.5 The assessment plan shall specify:
- a) The proposed UOC;
 - b) The role(s) of each assessor on the assessment team;
 - c) The proposed timeline and schedule for the fishery assessment including all on-site visits; and
 - d) The minimum audit duration (estimated number of assessor-days) giving due consideration to all required elements of the Fishery Assessment Methodology.

4.4.6 The assessment plan shall list all proposed meetings between the team and registered stakeholders and other parties identified for consultation, which may include:

- a) The fishery client;
- b) Relevant management authorities and/or regulatory agencies;
- c) Scientific institutions, environmental monitoring bodies, and/or fisheries scientists;
- d) Port agents and/or enforcement officers;
- e) Fishery associations, vessel owners or other industry representatives;
- f) Seafood processors or other actors within the supply chain; and
- g) Interested non-governmental or environmental organizations.

4.4.7 In the case of a data-limited fishery, the assessment plan shall provide details of workshops as required by the DLF Tool (Appendix 2).

Guidance on DLF Workshops

The assessment team should plan to hold the DLF workshop in person during the on-site visit. This will improve the team's access to stakeholders and should boost attendance at workshops. The team should aim to maximize their productivity while on site. The lead assessor should make every effort to gather complete information during the workshop itself. However, if additional information is required after completion of the workshop, then additional meetings should be scheduled. Follow-up meetings may entail the use of remote tools (e.g., videoconferencing) if appropriate to effectively communicate with stakeholders.

4.5 Desktop Review

Purpose of Desktop Review

The purpose of the desktop review stage is for the assessment team to assemble, review, and analyze documentary information about the fishery. Desktop review is a major component of a fishery assessment. Typically, the review is conducted off-site and it is completed before on-site activities are initiated. Desktop review provides a foundation for subsequent on-site assessment activities where the team will seek to verify the accuracy and completeness of documentary information that they have assembled.

4.5.1 The assessment team shall conduct a desktop review of the fishery according to the assessment plan. The lead assessor shall assign topics for desktop review to assessors according to their specific areas of responsibility as set out in the assessment plan.

4.5.2 Each assessor shall identify and compile literature relevant to their specific area of responsibility. Relevant literature shall be cited in the Fishery Assessment Report.

- 4.5.3 To facilitate a consistent and complete desktop review, the lead assessor shall give each team member a copy of the CSI Fishery Assessment Report Template.

Guidance on Types and Sources of Relevant Fishery Information

Examples of relevant literature (4.5.2) relevant to the fishery under assessment include:

- a) Legislation, regulations, laws, rules, CMMs;
- b) Governance documents or procedures from relevant management agencies;
- c) Government reports, symposia, consultations, meeting minutes, agendas, etc;
- d) Summary statistics for fishery compliance or records from monitoring and enforcement;
- e) Stock assessments, scientific publications, expert advice, guidance, etc;
- f) International instruments, agreements, conventions, advice, and codes of conduct;
- g) Information from non-governmental organizations; and
- h) Local and traditional fishery knowledge (LTFK).

The types of fishery information to be identified and compiled should encompass the materials listed in above (items a-h), although other sources may be consulted as well including information received directly or indirectly from the fishery client, management organizations, fishery participants, and associated entities. A Pre-Assessment Report, if available for the fishery under consideration, may also provide a useful compilation of relevant literature and valuable background information about the fishery.

In addition to document reviews, the assessment team may engage in other review activities, including evaluation of scientific and statistical information concerning the status of the fishery resource. Such information may derive from agency reports, stock assessments, and supporting research from management authorities or recognized scientific sources and organizations, including published scientific research or objective information from independent research produced by recognized institutions or otherwise credible sources.

As a general approach, the assessment team should seek to identify the Best Available Scientific Information (BASI) for the fishery. Information from different sources may be conflicting or even stand in contradiction. In such cases, the assessment team may place greater weight on the validity of peer-reviewed and published information sources. Nonetheless, traditional and local sources of knowledge may also be relevant to the fishery under consideration. The assessment team should consider local and traditional fishery knowledge (LTFK) in their evaluation, provided this information can be independently verified. Ultimately, the assessment team must judge the validity and importance of different information sources to the fishery assessment.

During subsequent stages of fishery assessment, the team will have an opportunity to conduct interviews with relevant personnel and to observe management processes. Such meetings provide a valuable opportunity to cross-check the validity of information that was considered during the desktop review.

4.6 On-site Assessment

- 4.6.1 The assessment team shall conduct an on-site assessment of the fishery according to the assessment plan. Major deviations from the plan should be approved by the CB's Program Manager.
- 4.6.2 The lead assessor shall notify the fishery client, registered stakeholders, and other participants in advance of on-site meetings. Notice should be given 30 days in advance if possible.
- 4.6.3 The assessment team shall, among other things, use the on-site assessment as an opportunity to verify information considered during the desktop review.
- 4.6.4 During on-site meetings, the assessment team may interview fishery managers, the fishery client, fishery participants, and other relevant stakeholder groups to cross-check the accuracy of information from document reviews.

Guidance on Stakeholder Engagement

The assessment team should try to effectively engage with stakeholders. The on-site assessment stage is a key opportunity for the assessment team to interview stakeholders and discuss the fishery under assessment. The team may interact with stakeholders via in person meetings, correspondence, telephone calls, or videoconferencing.

- 4.6.5 At the conclusion of on-site assessment work, the assessment team shall hold a closing meeting with the fishery client to present the team's findings and to discuss next steps. Any diverging opinions expressed by the fishery client about the team's findings should be discussed and, if possible, resolved. If not resolved, this should be recorded.

NOTE: Section 5.3 sets out scheme requirements for CB complaints and appeals processes.

- 4.6.6 A concise summary of each on-site meeting shall be included in the Fishery Assessment Report.
- 4.6.7 If the assessment team decides to modify the proposed UOC structure from what was publicly announced at the initiation of fishery assessment (see 4.3.2), the CB shall prepare a notice of UOC modification.

NOTE: Section 7.5 addresses the amendment of a UOC in a certified fishery.

- 4.6.8 The notice of UOC modification shall:
 - a) Provide a rationale for modification of the proposed UOC structure; and
 - b) Solicit input from registered stakeholders on UOC modification.
- 4.6.9 The CB shall submit the notice of UOC modification to CSI for posting on the CSI website.
- 4.6.10 As applicable, a summary of the UOC modification process, including stakeholder input received and the assessment team's responses, shall be recorded in the Fishery Assessment Report.

4.7 Assessing Conformity with CSI Requirements

- 4.7.1 The assessment team shall compile and review relevant objective evidence obtained during desktop review and on-site activities to assess conformity of the fishery with the CSI Fishery Management Standard.
- 4.7.2 For each CSI requirement, the assessment team shall determine if the fishery is in conformity (i.e., the requirement is fulfilled) or not in conformity (i.e., the requirement is not fulfilled).
- 4.7.3 The team's determination of conformity or non-conformity shall be based on Evaluation Parameters (EPs) as set out in the *CSI Guidance and Evaluation Parameters for Fishery Conformity Assessment* and briefly summarized below (Table 2).

Table 2. Evaluation Parameters.

Evaluation Parameter (EP) ⁵		
EP1	EP2	EP3
Management Process	Adequate Information	Status/Outcome
Evaluation of conformity is based on consideration of evidence for the implementation of appropriate processes or systems by management authorities.	Evaluation of conformity is based on consideration of evidence for the availability of information that is of sufficient quality and scope for its intended purpose.	Evaluation of conformity is based on consideration of evidence for the current state of the component in question falling within acceptable limits (i.e., status). Alternatively, evaluation of conformity may be based on evidence that the management approach is known or likely to have the intended effect on the component (i.e., outcome).

- 4.7.4 The assessment team shall provide a concise rationale in support of each determination of conformity or non-conformity for each CSI requirement. Rationales shall be responsive to the details specified in each of the applicable EPs and shall cite objective evidence.

NOTE: Rationales may refer to rather than repeat information already presented in the background section (4.11.2c) or elsewhere in the Fishery Assessment Report

Guidance on Evaluation Parameters

The assessment team determines whether a fishery is in conformity with the CSI Fishery Management Standard using EPs. An EP is a part of an CSI requirement that represents the finest level of evaluation considered during conformity assessment. EPs are intended to give assessors a systematic and objective way to consider the most salient technical aspects of each CSI requirement.

There are three types of EPs:

- Management Process;
- Adequate Information; and
- Outcome/Status.

⁵ Most CSI requirements have three EPs. A small number of requirements have only two EPs.

The degree of non-conformity or “grading” of the NC is based upon the number of EPs that are unmet as detailed in Section 4.8. Consequently, within a given requirement, the three types of EP carry equal weight. Note, however, that some CSI requirements consist of only two EPs and therefore their grading is based on the evaluation of two EP types.

- 4.7.5 In assessing EPs, the team may request clarification from the fishery client or solicit additional information. Such clarification requests may take place after the on-site assessment, but they shall be completed before the team meeting on conformity determination (see 4.7.7).
- 4.7.6 The lead assessor shall assemble the team’s proposed determinations of conformity and their supporting rationales for each CSI requirement. The lead assessor may wish to consolidate these results in a working draft of the Fishery Assessment Report.
- 4.7.7 The lead assessor shall convene a meeting of the assessment team to consider the proposed determinations of conformity and supporting rationales. The meeting may be held in person or via phone or video-conference call.
- 4.7.8 If disagreement arises about a conformity determination, the lead assessor shall strive to reach consensus among team members. However, if assessors cannot agree, then the final determination shall be decided by simple majority.

4.8 Non-Conformities (NCs)

- 4.8.1 If the assessment team determines that the fishery is not in conformity with a specific CSI requirement, the team shall raise an NC against that requirement.
- 4.8.2 Each NC shall be graded into one of the following categories:
 - a) Minor NC – The fishery does not meet any one (1) of the EPs within a given CSI requirement;
 - b) Major NC – The fishery does not meet any two (2) of the EPs within a given CSI requirement; or
 - c) Critical NC – The fishery does not meet three (3) EPs within a given CSI requirement.
- 4.8.3 The process of grading shall be iterated across requirements until the assessment team has graded all instances of non-conformity.
- 4.8.4 The team may, at their discretion, raise an “observation” to the attention of the fishery client. An observation is an area or issue of concern in an assessment that currently conforms with the Standard but could be improved upon. Observations are not binding upon fishery clients.
- 4.8.5 The assessment team shall review the performance level of the fishery relative to prescribed thresholds for conformity (Table3).

Table 3. Minimum fishery performance level is defined by the number and grade of NCs.

Core Tenet	Max. Number of NCs by Grade (not to be exceeded)				Max. Number of NCs by Grade (not to be exceeded)		
	Minor	Major	Critical		Minor	Major	Critical
1	3	0	0	Or	0	1	0
2	3	0	0	Or	0	1	0
3	3	0	0	Or	0	1	0
4	3	0	0	Or	0	1	0
EFM	3	0	0	Or	0	1	0

Note: Within a Core Tenet, the thresholds for minor and major NCs are not additive. In other words, the fishery may have either 1 major NC or up to 3 minor NCs but not both.

- 4.8.6 If the observed number of NCs exceeds prescribed threshold within a Core Tenet, then the assessment team shall pause the fishery assessment pending further review by the CB's Program Manager.

4.9 Critical NCs

Guidance on Critical NCs

Detection of a critical NC during a fishery assessment requires the immediate attention of the assessment team because it may bring the fishery assessment to a halt or possibly cause termination of the assessment altogether.

- 4.9.1 Upon raising a critical NC, the team shall stop the assessment and inform the CB's Program Manager and the fishery client.
- 4.9.2 The assessment team may ask the fishery client for additional information or clarification in relation to the critical NC. However, if the critical NC is not satisfactorily addressed by the submission of additional information, then the fishery assessment shall be stopped pending further review by the CB.
- 4.9.3 CB follow-up on critical NCs shall be as follows:
- Detection of a critical NC during the initial fishery assessment shall preclude certification until a successful verification audit of the fishery has been completed.
 - Detection of a critical NC during a surveillance audit or during a re-assessment shall be cause for immediate suspension of certification until a successful verification audit of the fishery has been completed.

4.10 Corrective Actions

- 4.10.1 The CB shall send a notice to the fishery client detailing all NCs raised in the fishery assessment.
- 4.10.2 Following receipt of an NC notice (per 4.10.1), the fishery client shall have 28 days to respond with evidence that the NC has been resolved or to submit a corrective action plan (CAP) to resolve the NC raised.

Guidance on Corrective Actions

A fishery client's corrective action may consist of taking an action or submitting information that directly addresses the NC raised. In some cases, the fishery client may be able to show the CB evidence that a corrective action has been effectively implemented. If the assessment team concludes that the client's submission provides evidence of NC resolution, then the CB may close-out the NC without further action. However, some corrective actions may constitute a set of ongoing activities (e.g., data collection efforts) that extend into the future. In such cases, a CAP should be prepared to describe the activities that will be implemented and to define the specific timeframe for resolving the NC. The assessment team may set interim milestones against which the team will judge progress in implementing the CAP during surveillance audits.

- 4.10.3 The lead assessor shall arrange for the assessment team to review the CAPs and/or evidence submitted by the fishery client to resolve NCs. The team's review shall seek to verify:
- a) The actions proposed are sufficient to fully resolve the basis for the NC; and
 - b) The proposed timeframe and milestones are appropriate given the complexity and scale of the issue(s) raised and the actions required to resolve them.
- 4.10.4 The assessment team shall decide whether to accept or reject submissions or to request further clarification from the fishery client. The lead assessor shall strive to find consensus among team members. However, if assessors do not agree, then the final decision shall be made by simple majority.
- 4.10.5 CAPs shall be formulated to resolve the NC within 12 months unless the complexity and/or scale of the issue identified dictates a longer timeline. When the timeline for a CAP exceeds 12 months, the assessment team shall specify annual milestones and targets to be evaluated during annual surveillance audits.
- 4.10.6 Except in extraordinary circumstances, NCs shall be closed within the period of validity of the fishery certificate (i.e., within 5 years).
- 4.10.7 If the CAP specifies activities or tasks that would require the cooperation and support of an external entity such as a fisheries management organization, the lead assessor shall verify that the entity has committed to undertake such actions. A formal written statement from the fisheries management organizations or other external entity should suffice.

- 4.10.8 The CB shall verify that the fishery client formally signs off on the CAP, including a commitment from the fishery client to provide the lead assessor with evidence of implementation according to prescribed timelines.

4.11 Fishery Assessment Report

Purpose of Fishery Assessment Report

The Fishery Assessment Report provides a comprehensive account of the fishery's conformity with CSI the CSI Fishery Management Standard. For each requirement of the Standard, the assessment team provides a detailed rationale to explain the basis for their determination. Where the team identifies an NC, corrective action by the fishery client and/or a CAP to address NCs are documented in the report. The Fishery Assessment Report receives a technical review from two independent peer reviewers who are experts in the subject matter. Peer reviewer comments, as well as assessment team responses to those comments, are documented in the report. The fishery client is also given the opportunity to comment on any errors or omissions. The Fishery Assessment Report is then published for 30 days to allow registered stakeholders to review and comment on the fishery assessment. Comments from registered stakeholders, as well as assessment team responses to those comments, are subsequently documented in the Certification Report.

- 4.11.1 The lead assessor shall oversee the preparation of a Fishery Assessment Report.

- 4.11.2 The Fishery Assessment Report shall contain the following:

- a) A description of the UOC;
- b) The assessment team's recommendation regarding certification of the fishery;
- c) A section providing background on the fishery (history, status, management, target stock biology, stock assessment method, ecosystem considerations, etc.);
- d) A description of existing traceability systems, risks, and the entry point of certified fishery products into CoC;
- e) An overview of conformity of the fishery with the CSI Fishery Management Standard;
- f) Details of the assessment findings, including any NCs raised and CAPs; and
- g) Comments from peer reviewers and responses from the assessment team.

- 4.11.3 The assessment team shall document in the Fishery Assessment Report their determination of conformity for each applicable CSI requirement⁶. Per clause 4.7.4, a concise rationale shall be provided which cites objective evidence.

NOTE: Appendix 6 gives guidance on assessments involving fisheries with multiple UOCs.

- 4.11.4 The lead assessor shall ensure that assessors have completed their duties in accordance with CB requirements and confirm that the assessment objectives have been fulfilled.
- 4.11.5 Upon request, the CB shall make the Fishery Assessment Report available to the Scheme Owner for the purpose of periodic review of consistency in reporting among CBs.
- 4.11.6 The Fishery Assessment Report shall be completed no later than six (6) months after the closing meeting with the fishery client at the end of the on-site assessment.

4.12 Review by Fishery Client

- 4.12.1 The CB shall provide the fishery client with a copy of the Fishery Assessment Report and allow the fishery client to review and respond to the assessment team's findings including identifying any errors or omissions.
- 4.12.2 As applicable, the assessment team may reconsider its findings in light of input from the fishery client.
- 4.12.3 The CB shall keep records of comments made by the fishery client and responses from the assessment team.

4.13 Peer Review

Purpose of Peer Review

The purpose of the peer review stage is to provide for an independent, technical review of the material presented in the Fishery Assessment Report. The technical review is done by two or more competent people who were not involved in the fishery assessment. The CB shall provide peer reviewers with a briefing on the CSI Certification Program (see 4.13.2), which is relevant to their assignment, but peer reviewers are not required to complete the CSI training described in Appendix 3.

- 4.13.1 The CB shall arrange for the Fishery Assessment Report to be reviewed by a minimum of two (2) peer reviewers who are independent of the fishery under consideration. The CB shall notify the fishery client of the appointed peer reviewers.

⁶ Conformity determinations shall be presented in all subsequent versions of the Fishery Assessment Report, including those versions used for fishery client review, peer review, public comment, and Certification Committee review, as well as the Certification Report.

- 4.13.2 Peer reviewers shall have sufficient knowledge and experience in fisheries management-related areas to provide a robust, technical evaluation of the Fishery Assessment Report. Peer reviewers shall be briefed on CSI requirements for peer review and given a Peer Review Report Template to use for submitting their comments.
- 4.13.3 The CB shall work with peer reviewers to ensure timely completion of peer review of the Fishery Assessment Report, preferably within 60 days.
- 4.13.4 Peer Review Reports shall be circulated within the assessment team. The team shall consider issues raised by peer reviewers and respond in writing, incorporating changes into the Fishery Assessment Report where the team deems it is necessary and appropriate to do so.
- 4.13.5 Peer Review Reports and assessment team responses to those reports shall be documented in the Fishery Assessment Report, which is published for stakeholder review (Section 4.14), and in all subsequent versions of the report.

4.14 Stakeholder Review

- 4.14.1 The CB shall submit the Fishery Assessment Report to CSI for publication on the CSI website for stakeholder review for a period of 30 days.
- 4.14.2 The CB shall notify all registered stakeholders that the Fishery Assessment Report is available for their review. The CB shall make clear that written comments from registered stakeholders must be received by the CB within 30 days to be considered by the assessment team.
- 4.14.3 After the close of the stakeholder review period, the assessment team shall consider each issue raised by registered stakeholders and respond in writing, incorporating changes into the Fishery Assessment Report where it is deemed necessary and appropriate to do so.
- 4.14.4 Comments from registered stakeholders and responses from the assessment team to those comments shall be documented in the updated version of Fishery Assessment Report for Certification Committee review (Section 5.1) and all subsequent versions of the report. The assessment team shall include their final recommendation regarding certification of the fishery in the report.

5 Certification

5.1 Certification Committee Review and Certification Decision

Purpose of Certification Committee Review

One of the last steps in the assessment process is a final, independent review of the fishery assessment by the CB's Certification Committee. If the Certification Committee makes a positive recommendation to certify, then the CB prepares a Certification Report for publication. The Certification Report provides a detailed account of the assessment team's evaluation of fishery conformity with the CSI Fishery

Management Standard. The report also provides a complete and public record showing fulfillment of all stages in the fishery assessment process up to and including review by the Certification Committee. In parallel with publication of the Certification Report, the CB issues a fishery certificate with a validity of five (5) years.

- 5.1.1 The CB shall have procedures for the review of fishery assessments and certifications decision-making which align with the requirements of ISO/IEC 17065.
- 5.1.2 The CB shall have its Certification Committee review the results and recommendations from the fishery assessment.
- 5.1.3 The CB's Certification Committee shall be comprised of a minimum of two persons who are competent to perform a technical review of the fishery assessment and who did not participate in the fishery assessment. The Certification Committee's membership shall collectively have knowledge or experience covering the following subject areas:
 - a) Fisheries science and fisheries management;
 - b) The CSI Certification Program and Fishery Assessment Methodology; and
 - c) Auditing and certification practices.
- 5.1.4 The Certification Committee shall review the Fishery Assessment Report and associated documentation – including NCs, proposed corrective actions, CAPs, and/or timeframes for completion – before making a recommendation on certification. If questions arise during review, the Certification Committee may request additional information from the lead assessor.
- 5.1.5 The Certification Committee shall recommend one of the following certification decisions:
 - a) Certify: The Certification Committee accepts the Fishery Assessment Report, the peer reviewer's comments, and evidence submitted by the fishery client concerning NCs and corrective actions.
 - b) Defer: The Certification Committee does not reach a unanimous recommendation because of substantial concerns with the assessment or the adequacy of corrective actions. The Committee may require the fishery client to submit additional information to address NCs. Subject to further data submissions or additional follow-up actions by the fishery client, the Certification Committee may review the file again.
 - c) Reject: The Certification Committee concludes that the fishery does not meet the CSI Fishery Management Standard and should not be certified based on the evidence submitted. Revised CAPs or further data submissions are insufficient to resolve the Committee's concerns.
- 5.1.6 The CB shall notify the fishery client of the certification decision within ten (10) days of receiving the Certification Committee's recommendation.

- 5.1.7 The notification in 5.1.6 shall include, as applicable, any specific recommendations from the Certification Committee regarding corrective action plans, CAPs or milestones.
- 5.1.8 The CB shall keep a record of the Certification Committee’s review and include a summary of that review in the Certification Report (see 5.2.1).
- 5.1.9 The CB shall inform CSI within five (5) days of making the certification decision.

5.2 Certification Report and Fishery Certificate

- 5.2.1 The CB shall prepare a Certification Report containing all aforementioned sections of the Fishery Assessment Report, including Peer Review Reports and assessment team responses (clause 4.13.5), stakeholder comments and assessment team responses (clause 4.14.4), and a summary of the review by the Certification Committee (clause 5.1.8).
- 5.2.2 The CB shall prepare a fishery certificate with a maximum period of validity of five (5) years.
- 5.2.3 The CB shall assign a unique certificate registration code to each fishery certificate using the format CSI-F-####, where “F” stands for fishery and #### is a unique string of digits.
- 5.2.4 The fishery certificate shall clearly identify the scope of certification and specify other relevant details including:
 - a) Name and address of fishery client;
 - b) UOC(s);
 - c) Relevant management authorities;
 - d) Target stock species;
 - e) Geographic region (to specify at a minimum the FAO Major Fishing Area);
 - f) Gear type(s);
 - g) Certificate issue date;
 - h) Certificate expiry date (five years less one day from the issue date); and
 - i) Information relevant to the entry of certified fishery products into certified supply chains.
- 5.2.5 Additional information that may be included in an Annex to the certificate include:
 - a) Fishery client group members (Appendix 4)

- b) List of participating fishers or vessel names in the fishery client group;
 - c) Corrective action plans and timeframes for resolution (as applicable); and
 - d) Approximate dates for annual surveillance audits.
- 5.2.6 The CB shall inform the fishery client that the certificate is the property of the CB and is subject to compliance with the CB's general rules and regulations, a copy of which shall be provided with the certificate.
- 5.2.7 The CB shall inform the fishery client about rules and regulations for use of the CSI logo and certification claim (see: <https://csicertified.org/chain-of-custody/ecolabel/>).
- 5.2.8 The CB shall send the Certification Report to the fishery client and to CSI for publication on the CSI website.

5.3 Appeal of a Certification Decision

- 5.3.1 Applicants or registered stakeholders may appeal a CB's certification decision using the CSI Complaints and Appeals Procedure (<https://csicertified.org/about/appeals-and-complaints/>).

Status of the Fishery Certificate during an Appeal Process

A CB's certification decision remains valid while an appeal is being processed, regardless of whether the CB's determination was positive or negative with respect to certification.

Example, positive determination: A registered stakeholder lodges a formal complaint with the CB about its decision to certify a fishery. The complaint investigation may cause the CB to reconsider its determination. However, the fishery would remain certified until such time as the CB revises its certification decision and formally withdraws the fishery certificate.

Example, negative determination: A certified fishery is suspended for failure to resolve an NC with the CSI Fishery Management Standard. The fishery client may appeal the CB's decision to suspend the fishery certificate. However, the suspension would remain in effect until the appeal process has been completed, the CB's decision has been revised, and the certificate has been formally reinstated.

- 5.3.2 Complaints shall be initiated with the CB following the CB's own procedure for handling complaints and appeals in accordance with ISO 17065. If the complainant is not satisfied with the decision of the CB, the complainant may submit its complaint directly to the CSI Appeals Board for further consideration.
- 5.3.3 Complaints that are substantiated by the CSI Appeals Board will be communicated to the CB and to their Accreditation Body (AB). Only the CB and their AB shall have the ability to reverse a certification decision.

5.4 Certification Agreement

- 5.4.1 The CB shall have a legally enforceable contract or “certification agreement” for the provision of certification services to its fishery clients.
- 5.4.2 The CB’s certification agreement shall comply with the requirements of ISO/IEC 17065:2012.
- 5.4.3 The CB shall incorporate requirements for certificate sharing (Appendix 4) into the certification agreement between CB and fishery client.

6 Surveillance

Purpose of Surveillance Audits

The purpose of surveillance is to monitor certified fisheries to ensure they remain in conformity with the Standard and, if applicable, to evaluate progress with corrective actions to address NCs. Surveillance audits are the mechanism by which CBs review evidence of continuing conformity on a regular (annual) basis.

6.1 General

- 6.1.1 The CB shall conduct surveillance audits of certified fisheries at least annually or more frequently if deemed necessary by the CB.
- 6.1.2 Surveillance audits may be undertaken with short notice (i.e., unscheduled audits) if deemed necessary by the CB.

6.2 Surveillance Audit Methodology

- 6.2.1 CBs shall schedule annual surveillance audits so that they are completed within 8 weeks of the anniversary of the date of certificate issue (i.e., the “target date”).
- 6.2.2 The surveillance audit may consist of two parts: a mandatory desktop review of documentary evidence (reports, published information, etc.) that has become available since the last fishery assessment or surveillance audit; and an optional on-site visit to meet with relevant personnel and stakeholders.

Guidance on Desktop Review vs. On-Site Visit

The preferred approach for conducting surveillance audits is to do most of the work off-site. A desktop review of documentary evidence should be the cornerstone of every surveillance plan. The desktop review may be augmented by off-site auditing tools such as web conferencing with the fishery client, fishery representatives, and/or stakeholders. Such telecommunication tools provide a valuable way to cross-check submissions of documentary evidence or to assess the performance of the fishery, the status of NCs, or progress against CAPs.

The CB may determine that the surveillance audit will need to have an on-site component. On-site visits are indicated when, for example, the CB becomes aware of a substantial change to the fishery or its

management system, or when on-site evaluation is needed to verify progress against CAPs. In all cases, however, the CB retains discretion to request an on-site visit if the desktop review is deemed insufficient to assess continued conformity of the fishery with the CSI Fishery Management Standard.

- 6.2.3 The CB shall appoint a lead assessor to the surveillance audit team.
- 6.2.4 The CB shall appoint one or more technical experts (assessors) to the audit team. The complement of assessors on the audit team shall reflect the breadth of expertise needed to review the subject areas that will form the main focus of the surveillance audit (Section 6.3).
- 6.2.5 The lead assessor shall develop a surveillance audit plan in consultation with the fishery client. The plan shall encompass a review of any items identified for surveillance in CAPs from the Certification Report or subsequent surveillance audit reports.
- 6.2.6 The lead assessor shall ask the fishery client for an update to include identifying:
 - a) Changes to the fishery or its management system; and
 - b) Issues arising that may impact conformity of the fishery with CSI requirements.
- 6.2.7 The default frequency for surveillance audits shall be annual.
- 6.2.8 The CB shall determine whether off-site surveillance methods are appropriate after taking into account *inter alia* the audit objectives, recommendations from previous surveillance audits, specific risks associated with the fishery, and the status of any open NCs as may be applicable.
- 6.2.9 If the CB determines that surveillance audit objectives can be fulfilled via desktop review, the CB shall schedule an off-site audit in consultation with the fishery client. The lead assessor shall ensure that sufficient time is allocated for off-site surveillance activities.
- 6.2.10 If the CB determines that an on-site visit is necessary, the CB shall schedule the surveillance audit in consultation with the fishery client. The lead assessor shall ensure that sufficient time is allocated for meetings with relevant management organizations.

NOTE: The on-site visit may be conducted by one or more assessors.

- 6.2.11 At least ten (10) days before undertaking the scheduled surveillance audit, the CB shall prepare a surveillance audit announcement and submit it to CSI for posting on the CSI website.
- 6.2.12 The announcement in 6.2.11 shall invite registered stakeholders to submit information relevant to the surveillance audit.

6.3 Focus of the Surveillance Audit

- 6.3.1 Surveillance audits shall focus on:

- a) The status of open NCs and fishery client progress against agreed CAPs;
- b) Changes in the management of the fishery;
- c) Changes within fishery management agencies or frameworks;
- d) New information about the status of the target stock (e.g., recent surveys or stock assessments);
- e) Impacts of ecosystem changes on the fishery or target stock;
- f) Changes in how the fishery impacts the ecosystem (e.g., change in bycatch of NT species, discard practices, ETP species interactions, gear-habitat interactions);
- g) Violations and enforcement information; and
- h) Other issues which may impact the conformity of the fishery with CSI requirements.

6.4 Surveillance Report

- 6.4.1 The CB shall prepare a surveillance report using the CSI Surveillance Report Template. Table 4 shows the main sections for reporting.

Table 4. Main sections of the Surveillance Report.

No.	Section Title	Content
1	Fishery Client Information	Review and confirm or update the point of contact and contact details of the fishery client.
2	UOC	Identify the UOC. Review and confirm that there have been no changes or updates to the UOC since the last audit.
3	Report Details	Specify the audit number (1, 2, 3 or 4) in the sequence of surveillance audits, the date(s) of the surveillance audit, the date of report completion, and members of the surveillance audit team.
4	On-Site Meetings	Identify on-site meetings with the fishery client, representatives of fishery management organizations, and/or other stakeholders. Include a brief summary of each meeting with the date and location and a list of attendees.
5	Fishery Information Update	Update general information about the certified fishery. Present updated fishery statistics (e.g., landings), summarize recent stock assessments, and describe any new fishery developments since certification.
6	Status of NCs and Progress against CAPs	List all NCs that remain unresolved and update their status. Close NCs that are resolved. Describe new NCs raised during surveillance if applicable. Review fishery client progress against CAPs since the previous fishery assessment or

		surveillance audit. Relate progress to interim milestones as applicable.
7	Summary and Recommendation	Provide a summary of findings from the surveillance audit and give the audit team's overall recommendations regarding continued certification, suspension, or withdrawal.
8	Conformity Statement	State the audit team's overarching conclusion regarding conformity of the fishery with the Core Tenets of the CSI Fishery Management Standard. In the statement, address any relevant changes in the fishery as may be applicable.
9	References	Provide a list of references and other supporting information that was reviewed in the surveillance audit. Include hyperlinks in citations where possible.
10	Next Surveillance	Proposed timing (default annual schedule or short notice) and format (on-site or off-site) of the next surveillance audit.

6.4.2 The Surveillance Report shall include a section on the status of NCs and progress against CAPs. This section shall, as applicable: describe any revisions to, or completion of, CAPs; provide an update on the status of all open NCs; identify and summarize progress towards resolution of NCs; and make recommendations for monitoring NCs in future surveillance audits.

6.4.3 The Surveillance Report shall include a section that provides an update on fishery information. Updates shall be based on fishery information that has become available since the last assessment or audit, and may include:

- a) Scientific advice and management actions related to the target stock; and
- b) Changes to the fishery management system, particularly those with potential to impact continued conformity of the fishery with CSI requirements.

6.5 Assessing Progress Against Corrective Action Plans

6.5.1 The surveillance audit team shall evaluate the progress and performance of the fishery in relation to agreed CAPs including specified timelines and interim milestones.

6.5.2 Evidence for progress against CAPs shall be documented in the Surveillance Report. Failure to attain interim milestones or meet specified timelines shall be documented as well.

6.5.3 The Certification Committee shall review the Surveillance Report. If the Certification Committee determines that progress against CAPs is inadequate, the committee may recommend suspension of the fishery certificate until such time as the specified requirements are fulfilled, or the Committee may require another action from the fishery client including:

- a) Revision of the CAP;
- b) Revision of interim milestones;

- c) Revision of the timeline to fully resolve the NC; or
- d) Other corrective actions as may be deemed necessary by the Committee.

6.6 Limited Re-Assessment

Purpose of Limited Re-Assessment

The purpose of limited re-assessment is to provide the CB with a mechanism for flexible and rapid response to credible concerns about the performance of a certified fishery. It is intended to function like a surveillance audit but it may be conducted on short notice and outside of a prescribed audit schedule. The CB has discretion to narrow the scope of a limited re-assessment to the issues of concern.

- 6.6.1 If at any point during the validity of a fishery certificate an issue arises with significant potential to negatively affect a fishery's continued conformity with the CSI Fishery Management Standard, the CB shall review the matter by initiating a limited re-assessment.
- 6.6.2 A limited re-assessment shall generally follow the methodology of a surveillance audit (Section 6.2) but with a scope that is narrowed to focus on the issue(s) of concern.
- 6.6.3 The CB shall notify the fishery client in writing of its intention to conduct a limited re-assessment and the rationale for doing so.
- 6.6.4 During limited re-assessment, assessors shall compile and review objective evidence relating to the issue(s) of concern and make a determination regarding the conformity of the fishery with the impacted CSI requirement(s). Assessment of conformity shall follow Section 4.7.
- 6.6.5 The assessment team shall prepare a Limited Re-assessment Report that presents the team's determination regarding conformity, and, as applicable, the fishery client's corrective actions, CAPs, and timeframes for resolution.
- 6.6.6 The Limited Re-assessment Report shall clearly state the assessment team's recommendation regarding continued certification of the fishery.
- 6.6.7 The Certification Committee shall review the Limited Re-assessment Report and recommend an action to the CB that may include suspension. If applicable, the CB shall initiate suspension of the fishery certificate in accordance with Section 6.7.
- 6.6.8 If the fishery client refuses to undergo limited re-assessment or fails to provide sufficient information for limited re-assessment, the CB shall suspend the fishery certificate pending potential withdrawal.

6.7 Certificate Suspension and Withdrawal

- 6.7.1 If at any time the CB determines that the fishery no longer meets the requirements for CSI fishery management certification, the CB shall initiate suspension of the fishery certificate.

- 6.7.2 The CB shall inform the fishery client in writing that the certificate has been suspended and provide a rationale for its decision to do so.
- 6.7.3 The CB shall inform the fishery client of the impact of certificate suspension on the chain of custody, use of the CSI certification claim or logo on product, or associated marketing activities.
- 6.7.4 In addition to 6.7.2-3, the CB shall instruct the fishery client to:
- a) Inform all members of the fishery client group about the certificate suspension within four (4) days;
 - b) Inform buyers/customers about the suspension within four (4) days and keep written records of having made such communications;
 - c) Cease making claims of CSI certification from the date of suspension; and
 - d) Cease selling fish as CSI-certified from the date of suspension.
- NOTE: The CB may allow the fishery client to sell fish caught prior to the suspension as CSI-certified seafood if such products can be reliably segregated based on capture date.
- 6.7.5 Within two (2) days of taking the decision, the CB shall inform CSI of the suspension and provide CSI with an announcement of the suspension for public dissemination.
- 6.7.6 The CB shall allow the fishery client up to 28 days to respond and provide additional information relevant to the suspension decision.
- 6.7.7 The Certification Committee shall review the additional information (submitted per 6.7.3) and consider whether the new evidence adequately addresses the issue of concern.
- 6.7.8 If submission of additional information adequately addresses the issue of concern and the Certification Committee determines there is no further evidence of non-conformity with the Standard, then the CB may reinstate the suspended certificate.
- 6.7.9 The CB shall not reinstate a suspended fishery certificate until it is satisfied that the issue of concern has been fully resolved and the fishery is in conformity with the Standard.
- 6.7.10 If, after the 28-day period, the fishery client has not provided additional information per 6.7.6 or the information provided does not adequately address the issue of concern per 6.7.9, the CB shall initiate withdrawal of the fishery certificate.
- 6.7.11 Within 14 days of the end of the abovementioned period (6.7.10), the CB shall notify the fishery client in writing of withdrawal of the fishery certificate. The notice shall specify the effective date of withdrawal.

- 6.7.12 The fishery client shall have up to 14 days to appeal the CB’s decision to withdraw the fishery certificate per Section 5.2 (Complaints and Appeals).
- 6.7.13 If no appeal is received from the fishery client within 14 days, the CB shall withdraw the fishery certificate and instruct the fishery client to discontinue all use of the withdrawn certificate.
- 6.7.14 The CB shall notify CSI within two (2) days of the suspension or withdrawal of any fishery certificate.

6.8 Re-Assessment and Re-Certification

Guidance on Scheduling Re-Assessment

A CSI fishery certificate is valid for a period of five (5) years, after which the fishery must be re-assessed before it can be re-certified. Ideally, re-assessment activities are concluded before the expiry of the existing fishery certificate so that the fishery maintains uninterrupted certification. In some cases, the CB may extend the length of the certificate with reasonable justification (see Section 7.3).

The fourth surveillance audit is usually the last scheduled audit to take place during the lifetime of a fishery certificate, occurring at or near the 4th anniversary of the date of certificate issuance. CBs should try to coordinate the timing of re-assessment activities with execution of the fourth (final) surveillance audit of the fishery client. Considerations are twofold:

- 1) the surveillance audit should occur within eight (8) weeks of the 4th anniversary of the date of certificate issue; and
- 2) the CB should ensure there is enough time to complete a fishery re-assessment and re-certification without creating a lapse in certificate validity at the 5th anniversary of the date of certificate issue (which corresponds to the date of certificate expiry).

Given that a fishery re-assessment may take nine (9) months or more to complete, it is anticipated that CBs will conduct the 4th surveillance audit as a desktop review (unless the CB determines an on-site surveillance audit is necessary). The on-site assessment activities would then occur during the 5th year of certification to support re-assessment of the fishery.

Example:

A. Certificate Issue Date	July 2, 2023	
B. Certificate Expiry Date	July 1, 2028	
C. 4 th Anniversary of A	July 1, 2027	
D. Eight weeks after C	Sep 1, 2027	Conduct surveillance audit via desktop
E. Nine months before B	Oct 1, 2027	Begin re-assessment process.

The advantage of this approach is that off-site surveillance work does not need to be duplicated and can serve as a foundation for the fishery re-assessment.

- 6.8.1 Re-certification shall be based on the CB performing a full re-assessment of the fishery in accordance with requirements set out in Section 4.

6.8.2 Fishery re-assessment shall include an on-site assessment that fulfills the requirements of Section 4.6.

6.8.3 To allow for continuity of certification, the CB shall initiate the fishery re-assessment with a sufficient lead time to enable its completion prior to expiry of the existing certificate.

Guidance on Re-assessment and Expiry Date of the Fishery Certificate

The CB should always aim to complete a re-certification well before the date of certificate expiry. Assuming the CB meets this deadline, then the period of validity stated on the new certificate should begin on the same day that the old certificate expires. When a re-assessment is completed early (e.g., several weeks ahead of the expiry date), the CB should nonetheless use the period of validity listed on the old certificate as a reference for setting dates of validity for the new certificate.

6.8.4 The CB shall inform CSI of re-certification within five (5) days of making the certification decision.

7 Additional Processes related to Fishery Management Certification

7.1 Certification File Review

7.1.1 Within 30 days of making a certification decision, the CB's Program Manager or appointee shall conduct an internal "Certification File Review" (CFR) with the objective to verify that the CB maintains on file a complete set of records from the fishery assessment.

7.1.2 The scope of CFR shall, at a minimum, encompass the following records:

- a) CFR checklist;
- b) Application Form completed and signed by the fishery client;
- c) CB contracts with the fishery client, assessors, and peer reviewers;
- d) Pre-Assessment Report (if applicable);
- e) Correspondence confirming the schedule of the on-site visit;
- f) Assessment plan;
- g) Fishery Assessment Report (versions for fishery client review, peer review, etc.);
- h) Written justification for deviation(s) from CSI guidance (as applicable);
- i) Peer Review Reports;
- j) Notification of the fishery client about NCs (if applicable);

- k) Correspondence about NCs and CAPs (if applicable);
- l) Notification of the fishery client about the certification decision;
- m) Stakeholder registrations and comments received from registered stakeholders;
- n) Records from Certification Committee meetings (Section 5.1); and
- o) Fishery certificate and Certification Report.

7.1.3 As part of CFR, the reviewer shall verify that all certification records are accessible and properly maintained either as hard copies or in electronic form.

7.2 Transfer of Certificates between CBs

Guidance on Transfer of a Fishery Certificate between CBs

CSI may authorize the transfer of a fishery certificate from one CB (the preceding CB) to another CB (the succeeding CB) provided the following conditions are met:

- the succeeding CB shall be a CSI-approved CB;
- the fishery client shall notify the preceding CB of intent to transfer certification at least three (3) months before the next scheduled surveillance audit; and
- the fishery client shall provide notice of intent to transfer at least 12 months before the expiry of the existing fishery certificate.

It is recognized that the certificate transfer process may take several months to complete. In order to ensure continuity of fishery certificates during this time period, the Scheme Owner intends for the preceding CB to honor its existing certificate until the succeeding CB has completed its audit of the fishery client.

7.2.1 Within five (5) days of receiving a request from a fishery client to transfer their fishery certificate to another CB, the current CB, hereafter referred to as the 'preceding CB', shall inform CSI of the request and seek authorization to proceed with the transfer.

NOTE: CSI will not authorize a transfer if the fishery certificate has less than 12 months of validity remaining.

7.2.2 Before initiating certificate transfer, the succeeding CB shall review the most recent Fishery Assessment Report or Surveillance Report for the fishery to satisfy itself that it has sufficient resources to take on the new fishery client.

7.2.3 The succeeding CB shall ask the preceding CB to provide relevant audit records and associated information about the fishery client. Relevant records shall include, at a minimum, the records listed in clause 7.1.2 (less the contracts identified in 7.1.2c).

- 7.2.4 The preceding CB shall comply with all reasonable requests from the succeeding CB for relevant audit records and other information about the fishery client.
 - 7.2.5 Certificate transfer shall not affect the timing of scheduled surveillance audits or fishery re-assessments except as permitted under a certificate extension (Section 7.3).
 - 7.2.6 The succeeding CB shall conduct a surveillance audit of the fishery client in accordance with surveillance audit requirements (Section 6). The audit shall be done as soon as practical after initiation of certificate transfer and in any event shall not cause scheduled surveillance activities to be delayed by more than three (3) months.
 - 7.2.7 Subject to a satisfactory surveillance audit, the succeeding CB shall issue a new fishery certificate to the fishery client and inform the preceding CB that the old fishery certificate may be withdrawn.
 - 7.2.8 In the event that surveillance results are unsatisfactory, the succeeding CB shall inform CSI and the preceding CB of a negative determination. Pursuant to its own review of evidence, the preceding CB may initiate suspension of the fishery certificate (Section 6.7).
- NOTE: Appeals against a negative determination made during certificate transfer shall be directed to the succeeding CB.
- 7.2.9 Upon receiving notice from the succeeding CB per 7.2.7, the preceding CB shall withdraw its fishery certificate.
 - 7.2.10 The succeeding CB shall notify CSI within five (5) days of completing certificate transfer.

7.3 Certificate Extension

Guidance on Certificate Extension

In situations where there is reasonable justification, the CB may grant an extension to the period of validity of a fishery certificate up to one (1) year beyond the expiry date. The following issues are considered reasonable justification: difficulties associated with transition to a new version of the CSI Fishery Management Standard; transfer to a new CB; and logistical challenges of implementing new data and information collections. All extension requests must be approved by the Scheme Owner before being granted by the CB.

- 7.3.1 The CB shall only accept a certificate extension request if it is submitted in writing by the fishery client and accompanied by a reasonable justification for certificate extension.
- 7.3.2 The CB shall initiate review of the technical merit of the extension request, including an appraisal of the fishery client's justification for requesting certificate extension.
- 7.3.3 The CB shall consider the following as reasonable justification for certificate extension:

- a) Difficulties associated with the transition to a new version of the CSI Fishery Management Standard;
- b) Complications associated with transfer of the certificate to a new CB; and
- c) Unforeseen impediments to the collection of fishery data or other information.

7.3.4 The CB shall inform CSI about the certificate extension request and provide a recommendation as to the appropriate response (approval or disapproval) based on the CB's review of the rationale and supporting evidence provided by the fishery client.

NOTE: During accreditation assessments, the AB may review certificate extension requests to verify that certificate extensions are done in conformity with CSI requirements.

7.3.5 Regardless of the status of a certificate extension request, the CB shall ensure that monitoring of the fishery via surveillance audits continues without interruption.

7.4 Changes to Scheme Requirements

Guidance on Changes to Scheme Requirements

As Scheme Owner, CSI conducts a full review and revision of the CSI Fishery Management Standard once every five (5) years. In addition to scheduled standard reviews, CSI may find it necessary to issue minor revisions to scheme requirements from time to time. For all such changes to scheme requirements, CSI will specify a mandatory transition period. The mandatory transition period will identify the timeframe for CBs to implement the changes as well as the timeframe for fishery clients to come into conformity with revised CSI requirements.

7.4.1 The CB shall have a procedure to notify fishery clients of changes to CSI scheme requirements. At a minimum, the CB's procedure shall address:

- a) The timeframe for notifying fishery clients of changes to requirements;
- b) The method of notification;
- c) How the CB will bring to the fishery client's attention changes that may affect ongoing conformity with the CSI Fishery Management Standard; and
- d) The mandatory transition period, as specified by the Scheme Owner, during which fisheries must attain full conformity with new or revised CSI scheme requirements.

7.4.2 The CB shall verify that its fishery clients implement changes to come into alignment with new scheme requirements including taking any actions that may be specified by the Scheme Owner.

7.4.3 The CB shall notify their AB of changes to scheme requirements and the associated mandatory transition periods.

7.5 UOC Amendment

- 7.5.1 The CB shall only accept a request to amend the UOC of a certified fishery if the fishery client submits the request in writing and provides reasonable justification for UOC amendment.
- 7.5.2 In response to such a request, the CB shall initiate an evaluation of the feasibility of amending the original UOC. The CB's evaluation shall consider whether the proposed UOC amendment can be made without adverse impacts to:
- a) Conformity of the fishery with the Standard; and
 - b) The reputation of the CSI Certification Program.
- 7.5.3 The CB shall document its evaluation of feasibility in a UOC Amendment Report.
- 7.5.4 The Certification Committee shall review the UOC Amendment Report to verify that the considerations identified in clause 7.5.3 are satisfied.
- 7.5.5 The CB shall share the UOC Amendment Report with the fishery client and CSI.
- 7.5.6 If UOC amendment is not deemed to be feasible, the CB shall notify the fishery client and take no further action with the fishery certificate.
- 7.5.7 If UOC amendment is deemed to be feasible, the CB shall prepare a notice of UOC amendment. The notice shall:
- a) Provide a rationale for the proposed amendment of the UOC; and
 - b) Solicit input from registered stakeholders on the proposed UOC amendment.
- 7.5.8 The CB shall submit the notice of proposed UOC amendment to CSI for posting on the CSI website for 30 days.

Stakeholder Review and Comment on Proposed UOC Amendment

The intent behind publishing a notice of UOC amendment is to provide registered stakeholders with an opportunity to review and comment on the proposed changes to the UOC of the certified fishery. If no comments are received from stakeholders, the CB should record this fact in the final version of the UOC Amendment Report and proceed with the amendment process.

- 7.5.9 After the close of the notification period in 7.5.8, the CB shall consider input received from stakeholders and evaluate whether those concerns have a material impact on the determination in 7.5.2.
- 7.5.10 The CB shall update the UOC Amendment Report to reflect input received from stakeholders and CB responses, and submit the final version of the report to CSI for posting on the CSI website.

NOTE: The UOC Amendment Report and UOC amendment notice will be published on the CSI website and remain there until expiry of the amended fishery certificate.

- 7.5.11 The CB shall amend the original fishery certificate with details of the new UOC but without altering the original date of certificate expiry.
- 7.5.12 The CB shall send the amended fishery certificate to the fishery client and instruct the client to immediately discontinue use of the original fishery certificate.
- 7.5.13 The fishery client shall be informed of its obligation to advise affected parties of the UOC amendment, specifically in relation to the potential for the revised UOC to impact the chain of custody, use of the CSI certification claim or logo on product, or associated marketing activities.
- 7.5.14 The CB shall inform CSI about the UOC amendment within five (5) days of issuing the amended fishery certificate.
- 7.5.15 Future surveillance audits of the fishery shall follow the original surveillance schedule but with a scope reflecting the amended UOC.

7.6 Fishery Assessors: Appointment, Training, and Management of Competence

- 7.6.1 The CB shall have an assessor approval process to ensure that every assessor appointed by the CB to a fishery assessment team meets the requirements of this CSI Fishery Assessment Methodology, including applicable competency requirements (Appendix 3).
 - 7.6.1.1 The approval process shall extend to the appointment of lead assessors.
- 7.6.2 In addition to 7.6.1, the CB shall ensure that its fishery assessors meet applicable requirements of its own internal procedures.
- 7.6.3 As part of the assessor approval process, the CB shall:
 - a) Obtain a Curriculum Vitae (CV) from the candidate that details relevant professional qualifications, training, and experience;
 - b) Confirm that the candidate meets applicable CSI assessor requirements;
 - c) Conduct an interview with the candidate; and
 - d) Confirm the candidate can communicate adequately in CSI's working language.

CSI's Working Language

Currently, CSI's policy is that the working language of the CSI Certification Program is English. English will remain CSI's official working language until the CSI Board of Directors specifies otherwise. Consequently, CSI requires that all reports (e.g., fishery assessment reports, surveillance reports) and announcements

are prepared in English. However, CSI's language policy does not and should not prevent CBs from translating documents into a local language if it is appropriate to do so.

- 7.6.4 Upon approval, the CB shall provide the assessor with an orientation session covering:
- a) The CB's quality management system and relevant internal procedures;
 - b) The assessor's role and responsibilities; and
 - c) An overview of CSI fishery assessment requirements.
- 7.6.5 The CB shall maintain a master list of approved assessors and share it with CSI upon request.
- 7.6.6 Assessors who have not performed a fishery assessment within the prior 24 months must repeat the CB approval process before being appointed to a fishery assessment team.
- 7.6.7 The CB shall have in place a formal agreement (i.e., a contract) with each of its subcontracted assessors and the agreement shall be signed by both parties.
- 7.6.8 The CB shall ensure that its fishery assessors sign a confidentiality agreement and a conflict-of-interest declaration for each new fishery assessment undertaken.
- 7.6.9 The CB shall periodically review the performance of its approved assessors, including a review of contributions made by assessors to fishery assessment reports and/or surveillance reports.
- 7.6.10 The CB shall provide its approved assessors with reasonable opportunities for continuing professional development in fields related to fishery management.
- 7.6.12 The CB shall maintain the following records for each of its approved fishery assessors:
- a) Date of assessor approval;
 - b) CV per 7.6.3a;
 - c) Log of assessments completed;
 - d) External training certificates;
 - e) Records of training in the CSI Certification Program;
 - f) Records of internal training;
 - g) Assessor performance reviews per 7.6.9;
 - h) Continuing professional development activities per 7.6.10;
 - i) A copy of the signed CB-assessor agreement per 7.6.7;

- j) Signed conflict-of-interest declaration per 7.6.8;
- k) Signed confidentiality agreement per 7.6.8.

Appendices

Appendix 1. List of Acronyms

AB	Accreditation Body
ABNJ	Area Beyond National Jurisdiction
BASI	Best Available Scientific Information
CAP	Corrective Action Plan
CB	Certification Body
CFR	Certification File Review
CMM	Conservation and Management Measure
CoC	Chain of Custody
CSC	Certified Seafood Collaborative
CSI	Certified Seafood International
CV	Curriculum Vitae
DLF	Data-limited fishery
EFM	Enhanced Fishery Module
EP	Evaluation Parameter
ETP	Endangered, Threatened, or Protected
FAO	Food and Agriculture Organization
FAM	Fishery Assessment Methodology
FMOA	Fisheries Management Organization or Arrangement
FMS	Fishery Management System
GSSI	Global Sustainable Seafood Initiative
IEC	International Electrotechnical Commission
IRCA	International Register of Certificated Auditors
ISO	International Organization for Standardization
IUU	illegal, unreported and unregulated
LTFK	Local and Traditional Fishery Knowledge
NC	Non-conformity
NT	Non-target
RFM	Responsible Fishery Management
RFMO	Regional Fisheries Management Organization
S&I	Scale and Intensity
UCoC	Unified Chain of Custody (UCoC Standard)
UN	United Nations
UOC	Unit of Certification

Appendix 2. Data-Limited Fishery (DLF) Tool

The RFM program developed a risk-based approach for data-limited fisheries, known as the Data Deficient Framework (DDF). It can be accessed [here](#). CSI is expanding upon this work with an updated version called the data-limited fishery tool (DLF Tool). The scope of application of the DLF Tool will include target stocks, non-target (NT) species, and ETP species. CSI may extend the scope of the DLF Tool to encompass habitats (CSI Management Theme 4.3) as well.

Appendix 3. Competency Requirements for Fishery Assessors.

1. Assessor (Team Member), Fishery Assessment Team
<p>1A. Qualifications</p> <ul style="list-style-type: none"> i. Ability to prepare reports in English. ii. Formal education in biology or a field related to fisheries (minimally, a high school diploma or its equivalent). iii. Formal CB approval from the CB as an assessor on the fishery assessment team.
<p>1B. Training</p> <ul style="list-style-type: none"> i. Completion of a CSI-recognized training course in fishery assessment techniques which covers: <ul style="list-style-type: none"> a) General knowledge of the CSI Certification Program; b) the CSI Fishery Management Standard and guidance; c) the CSI Fishery Assessment Methodology; and d) relevant FAO instruments including the Code of Conduct⁷ and Ecolabelling Guideline⁸. ii. Training in relevant audit techniques including formal training for conducting fishery assessments under the CSI Fishery Management Standard. iii. Training shall be updated at least once every two (2) years.
<p>1C. Experience/Skills</p> <ul style="list-style-type: none"> i. Knowledge and skills in the specific area(s) assigned for the fishery assessment.
2. Lead Assessor, Fishery Assessment Team
<p>2A. Qualification</p> <p>Same as 1A (above) plus:</p>

⁷ FAO. 1995. Code of Conduct for Responsible Fisheries. Rome, FAO. 1995. 41 p. <https://www.fao.org/responsible-fishing/resources/detail/en/c/1316854/>

⁸ FAO. 2009. Guidelines for the Ecolabelling of Fish and Fishery Products from Marine Capture Fisheries. Revision 1. Rome, FAO. 2009. 97p. <https://www.fao.org/3/i1119t/i1119t.pdf>

<ul style="list-style-type: none"> i. ISO lead assessor qualification based on ISO 9001⁹, ISO 14011¹⁰ or ISO 19011¹¹ administered through an IRCA-registered training body. ii. Formal approval from the CB for the role of lead assessor on the fishery assessment team.
<p>2B. Training</p> <p>Same as 1B (above)</p>
<p>2C. Experience/Skills</p> <p>Same as 1C (above) plus:</p> <ul style="list-style-type: none"> i. Previous experience as an assessment team member on at least three (3) fishery assessments.

⁹ ISO 9001:2015 Quality management systems — Requirements. <https://www.iso.org/standard/62085.html>

¹⁰ ISO 14011 ISO 14001:2015 Environmental management systems — Requirements with guidance for use. <https://www.iso.org/standard/60857.html>

ISO 19011:2018 Guidelines for auditing management systems. <https://www.iso.org/standard/70017.html>

Appendix 4. Certificate Sharing Requirements.

Purpose of Certificate Sharing

CSI promotes and strives for “one fishery, one certificate” in fishery certification structures as the benefits of certificate sharing include:

- 1) Minimizing or eliminating redundancies in fishery assessments, thereby reducing the audit burden placed on fishers, managers, stakeholders and other audit participants;
- 2) Facilitating equitable access to fishery certificates; and
- 3) Ensuring that the CSI Certification Program does not create a barrier to free trade and serves to improve market access.

A4.1 The CB shall incorporate requirements A4.1.1 - A4.1.8 into the certification agreement between CB and fishery client.

A4.1.1 The fishery client shall publicly announce its commitment to sharing the fishery certificate under a reasonable arrangement.

A4.1.2 The fishery client shall make available to members and prospective members of the fishery client group a certificate sharing arrangement that may include the following components:

- a) Member application and admission process;
- b) Cost sharing agreement;
- c) Any other conditions for sharing of the certificate; and
- d) Member removal process.

A4.1.3 The fishery client may choose to require cost sharing as a condition for certificate sharing for fishery client group members. Where cost sharing is required by the fishery client, a certificate cost sharing agreement shall be established that applies costs equitably across fishery client group members.

A4.1.4 The costs covered in any certificate cost sharing agreement shall be limited to costs associated with preparing for, obtaining, and maintaining certification. Such costs may include:

- a) Direct costs paid by the fishery client to a CB;
- b) Direct costs incurred by the fishery client in managing or facilitating fishery assessment, re-assessment, or surveillance audits;
- c) Direct costs previously incurred by the fishery client in preparing the fishery for certification (e.g., Fishery Improvement Program management and support);

- d) Cost of the fishery client's time spent managing or facilitating fishery assessment, re-assessment, or annual surveillance audits which may include but are not limited to, costs associated with developing corrective action plans and/or implementing corrective actions to address non-conformances; and
 - e) Cost of the fishery client's time spent on administration and support activities required to effectively manage the fishery client group and its membership.
- A4.1.5 The fishery client, at the request of CSI, shall share information on calculations behind the cost sharing agreement so that CSI may review the equitability of certificate cost sharing.
- A4.1.6 In response to a good faith request for certificate sharing from a prospective fishery client group member, the fishery client shall allow the member to access the fishery certificate within 30 days of fulfillment of applicable conditions of the certificate sharing arrangement consistent with A4.1.2.
- A4.1.7 The fishery client shall maintain and provide the CB and CSI with an updated list of fishery client group members in good standing within five (5) working days of any change in composition.
- A4.1.8 The fishery client has the right to remove from the certificate any fishery client group member that fails to fulfill obligations under the certificate sharing arrangement.
- A4.2 Section 6.7 of the CSI Fishery Assessment Methodology provides directions on CSI fishery certificate suspension and withdrawal. Failure of the fishery client to adhere to certificate sharing requirements delineated in Appendix 4 may result in certificate suspension and/or withdrawal.
- A4.3 If CSI determines, or the CB becomes aware of, any of the following actions/inactions by the fishery client with respect to certificate sharing, the CB shall initiate the suspension/withdrawal process:
- a) Fishery client failed to provide timely access to the certificate in accordance with the certificate sharing arrangement;
 - b) Fishery client failed to adhere to the cost sharing agreement;
 - c) Fishery client failed to maintain and provide an accurate list of members of the fishery client group;
 - d) Fishery client failed to provide certificate sharing information to the CB or CSI upon request; or
 - e) Fishery client failed to meet obligations in Appendix 4 on certificate sharing.

Appendix 5. Guidelines for UOC Structure

A5.1 Purpose

The CSI Fishery Assessment Methodology (FAM) provides a method to assess the fishery management system (FMS) of wild-capture fisheries. This methodology requires that the fishery being put forward for certification is delineated into one or more Units of Certification (UOCs). CSI sets out four criteria that CBs shall consider when structuring the UOC(s) for a fishery:

Criterion 1. The target stock of the fishery;

Criterion 2. The gear type(s) used in the fishery;

Criterion 3. The geographical area over which the fishery harvests the target stock(s); and

Criterion 4. The organizations involved in management of the fishery and target stock(s).

The purpose of Appendix 5 is to provide CBs and assessors with guidelines on how to apply UOC criteria to ensure that they are used consistently across CSI assessments of wild-capture fisheries.

A5.2 Delineation of the Fishery

A5.2.1 Overarching Goal of UOC Guidelines

Guideline 1: Goal => one fishery, one certificate

CSI strives to have each fishery assessment encompass an entire fishery. Expressed another way, CSI's goal is that there should be "one fishery, certificate." This approach aims to maximize the inclusion of fishery participants while avoiding duplication of fishery assessments and reducing parallel/overlapping fishery certifications. However, for reasons explained below, it is unrealistic to expect that a single UOC will always adequately represent an entire fishery. In practice, the UOC will represent a subset of the larger fishery, potentially excluding certain fleet segments and/or types of fishing activities.

A5.2.2 CSI Definition of Fishery and Delineation of the UOC

Guideline 2: $UOC \leq Fishery$

As a first step in structuring a UOC, the CB should consider the breadth of the fishery being put forward for certification. To the extent practical, the CB should delineate the boundaries of the fishery in a way that aligns with the CSI definition¹² of a fishery. Two specific aims are emphasized. First, the UOC should

¹² CSI defines 'fishery' broadly so that it has potential to encompass all of the people and activities associated with harvesting, ideally in a way that corresponds to the unit recognized by fishery managers.

be “practical” insofar as it should broadly align with how the fishery unit is recognized by its principal management authorities. Second, the UOC should be “inclusive” such that the UOC will circumscribe most, if not all, fishery participants.

A5.2.3 Limits to UOC Scope

Guideline 3: *Limit condition: separate nations have independent FMSs => separate certifications*

Despite CSI’s goal of single fishery certifications, there are limits to what can be included within the scope of one fishery assessment. CSI defines this outer limit condition as the point where, for a given fishery resource, the jurisdiction of one nation ends and the jurisdiction of another nation begins. This point is meant to reflect the independence of sovereign nations over their fishery management systems (FMSs). Consequently, the limit condition is the point where CSI guidelines for UOC structure cease to apply, and where the fishery of an adjoining sovereign nation should be assessed separately.

Notwithstanding the default position described above, it remains a formal possibility that two or more nations that co-manage a single fishery might seek certification as one unit. When presented with such a case, rather than assume a single assessment will suffice, the CB should satisfy itself that there is no bona fide differences in the way the two national authorities manage the fishery (also see caveats noted under Guideline 11 and 12).

A5.2.4 Fishery Client Input on the UOC Structure

Guideline 4: *Fishery client has input on UOC structure*

The CSI scheme allows fishery clients to have input on UOC structure. A fishery client may put forward an entire fishery or just a part of it. For example, a fishery client who represents a sub-sector defined by a specific gear type (e.g., a fleet of bottom trawlers) may elect to put forward for certification only that segment of the fishery. Similarly, fishery clients have discretion over the nomination of the target stock or stocks. The CB should try to fulfil client preferences for UOC structure as long as doing so is consistent with CSI requirements and guidelines. In the event that UOC may exclude some fishery participants, the CB should inform the fishery client about the obligation to share the fishery certificate (Appendix 4) with fishers outside the fishery client group.

A5.3 Criterion 1: The Target Stock

A5.3.1 Target Stock and UOC

Guideline 5: *Species-level identification of target stocks*

The main purpose of Criterion 1 is to ensure that seafood from any stock that may one day be eligible to bear the CSI ecolabel is clearly identified as a target stock during all stages of the fishery assessment process. Specification of the target stocks in the UOC ensures that they will be accurately identified to the species level (at least) upon entry into certified supply chains.

A5.3.2 Multiple Target Stocks and UOC Structure

Guideline 6: Different target stocks are placed into separate UOCs

Criterion 1 is meant to provide clarity on seafood from stocks which may bear the CSI ecolabel. It is not meant to create a barrier to the certification of multi-species fisheries.

When a multi-species fisheries undergoes assessment, the fishery client is given discretion to decide which stocks are nominated as target stocks¹³. By default, CBs should assign each target stock to a separate UOC. This separation is meant to ensure that all CSI requirements pertaining to target stocks – in particular the requirements of Core Tenet 2 – are fully and transparently assessed.

Guideline 7: Under certain conditions, different target stocks may be combined into one UOC

Under certain conditions, it may be appropriate for CBs to combine two or more target stocks together into a single UOC. Such combining of target stocks may be justified when:

- The species involved are commercially and/or operationally inseparable (e.g., when closely related species or members of a species complex are harvested together but they cannot be reliably distinguished in the field);
- Combining them will not undermine the chain of custody of certified products from the fishery;
- A combined UOC better reflects the unit recognized by/managed by the FMOA; and
- Combining them into one UOC will not compromise the assessment team's ability to evaluate whether the stocks involved meet all applicable CSI requirements.

A5.3.3 Shared Target Stocks

Guideline 8: Identify shared target stocks

Shared target stocks (i.e. transboundary stocks) affect the scope of a fishery assessment by, among other things, prompting evaluation of CSI Criteria 1.1.6, 1.4.2, and 2.1.7. During the process of establishing

¹³ Per Guideline 4, the fishery client is allowed to decide which components of the harvest are put forwards as a target stock (and hence may one day be eligible to bear the CSI ecolabel) and which components are not.

UOC structure, the CB should determine whether any of the stocks put forward for certification are shared target stocks.

A5.4 Criterion 2: Gear Types

A5.4.1 The effects of Gear Types are Evaluated Independently

Guideline 9: Different gear types are placed into separate UOCs by default

The main purpose of Criterion 2 is to ensure that the fishery assessment process entails a thorough evaluation of the effects of gears on species, habitats, and ecosystem. By default, CBs should apply Criterion 2 such that the different gear types¹⁴ used to harvest a target stock(s) are placed into separate UOCs. This is meant to ensure that the assessment team will look at the effects of different gear types independently of one another. In applying Criterion 2, the assessment team may also need to consider whether fishing method alters how the gear interacts with species, habitats, and ecosystem.

Guideline 10: Under certain conditions, different gear types may be combined into one UOC

Under certain conditions, it may be appropriate for CBs to combine gear types into a single UOC. Such combining of gear types may be justified when:

- Combining gear types is consistent with how the FMOA manages this segment of the fishery;
- The fishing method is similar across gear types in terms of spatial and temporal patterns; and
- The gears involved have comparable environmental effects with respect to Core Tenet 4.

A5.5 Criterion 3: Geographic Area

Guideline 11: Geographic area => jurisdiction

The main purpose of Criterion 3 is to clearly define where fishing occurs. This knowledge enables identification of the relevant fishery jurisdiction(s). When taken together with Criterion 4, the specification of geographic area should make it possible to unambiguously identify the principal management authorities charged with oversight of the fishery.

Each UOC should specify a geographic area according to the FAO Major Fishing Areas¹⁵ system. The UOC may further refine geographic area according to regional or national jurisdictions/boundaries, and, as

¹⁴ For a listing of relevant gear types and definitions, see: He, P., Chopin, F., Suuronen, P., Ferro, R.S.T and Lansley, J. 2021. Classification and illustrated definition of fishing gears. FAO Fisheries and Aquaculture Technical Paper No. 672. Rome, FAO. <https://doi.org/10.4060/cb4966en>.

¹⁵ <https://www.fao.org/fishery/area/search/en>

applicable, other areas of relevance to fishery management (e.g., stock divisions, statistical areas, RFMOs). Note: as discussed in Guideline 2, the waters of two adjacent nations should usually not be assigned to one UOC; they should be evaluated through separate assessment and certification processes.

Guideline 12: *Sub-national geographic areas are combined into one UOC by default*

The relevant scale of a geographic area is, by default, assumed to be at the national level. Sub-national divisions of geographic area (e.g., local, county, state, provincial) should generally be avoided as the basis for separating UOCs. This assumption is subject to the caveat that fine-scale divisions may reflect a bona fide difference in the way a fishery is managed. If there are two management systems governing a single fishery and they clearly operate with a substantial degree of independence from one another, then they should be assigned to separate UOCs for assessment purposes regardless of geographic scale.

Guideline 13: *Geographic area => spatial extent of biological information*

A clear delineation of geographic area also serves to support a rigorous fishery assessment process by bounding the spatial extent of biological information that will need to be reviewed. For example, the assessment team will need to verify which stock or stocks are being harvested by the fishery. Similarly, the spatial extent of fishing operations will be key to understanding overlap of the fishery with habitats and ecosystems (Management Themes 4.3 and 4.4, respectively).

Guideline 14: *The supply chain relies on accurate information about harvest area*

In addition to the foregoing, information about geographic area will also support the integrity of the certified supply chain. The Unified Chain of Custody Standard utilized by CSI relies on clear documentation of harvest area. This ensures that downstream claims about product origin are accurate. If having a single UOC would introduce uncertainty about tracing products back to the area of harvest, then the CB should consider alternate approaches. This may involve splitting-up a UOC to reflect the underlying supply chain.

A5.6 Criterion 4: Principal Management Authorities

A5.6.1 Identification of Principal Management Authorities

Guideline 15: *Principal management authorities are specified in the UOC*

The main purpose of Criterion 4 is to clearly establish which entities comprise the Fishery Management Organization or Arrangement (FMOA). As such, the CB should clearly specify the principal management authorities in the UOC. Per Guideline 11, these authorities ought to be readily identifiable by jurisdiction.

A5.6.2 Sub-national and National Levels

Guideline 16: National and sub-national authorities may be combined into one UOC

Fishery management typically involves the activities of national and sub-national authorities working together in some type of cooperative arrangement. In such cases, the CB's default assumption should be that both national and subnational management authorities may be combined into one UOC.

At a sub-national level, the CB should also assume that two or more sub-national management authorities may be placed in the same UOC. This mirrors the approach taken with geographic area (Guideline 12) and a similar caveat applies: if there is a bona fide difference in the way two sub-national authorities manage a single fishery, then they should be placed in separate UOCs.

A5.6.3 International Level

Guideline 17: International cooperation can usually be assessed without affecting UOC structure

For widely distributed or highly migratory stocks, effective fishery management may entail varying degrees of interaction between national authorities and relevant international partners or bodies¹⁶. For example, a national fishery agency may participate in or cooperate with international commissions, multi-lateral treaties, regional management bodies, or international scientific fora. Such activities are usually assessed as part of the normal course of a fishery assessment (e.g., see CSI Requirements 1.1.6, 1.4.2, and 2.1.7) and so they should usually not affect decisions about UOC structure.

Guideline 18: The UOC of a high seas fishery specifies a national management authority

Fisheries on the high seas present unique challenges for certification. The geographical area (Guideline 11) of a high seas fishery will correspond to an area beyond national jurisdiction (ABNJ), and authority over such a fishery may rest with a regional fishery management organization (RFMO) or a comparable international body. In such cases, the relevant national and international management authorities should be combined into one UOC. Note, however, that the UOC should always specify a national management authority, even if that body already participates directly in the RMO/international arrangement.

¹⁶ When an international body plays a significant role in management of the target stock, it should be identified as a principal management authority in the UOC.

Appendix 6. Guidance on the Assessment of Fisheries with Multiple UOCs

When a fishery is comprised of multiple UOCs, the structure is likely to create redundancy in the assessment process because the UOCs share common elements. Of particular concern, repetition of information about a shared UOC element has the potential to greatly expand the length of a fishery assessment report without adding much value to the process. To address this concern, CSI allows the assessment team to consolidate a selection of recurring UOC elements (Guidelines in Table A6.1) for reporting purposes. This provision is intended to increase assessment and reporting efficiency without sacrificing accuracy, completeness, or rigor. It does not undermine the obligation of the assessment team to verify that each UOC is in full conformity with all applicable CSI requirements.

Table A6.1. Guidelines for consolidation of multiple UOCs relative to Core Tenets of the CSI Standard.

	Multiple UOCs for...		
	Target Stock (Criterion 1)	Gear Type (Criterion 2)	Geographic Areas (Criterion 3) and/or Principal Management Authority (C4)
FMS (Core Tenet 1)	UOCs may be combined for assessment	UOCs may be combined for assessment	Assess each UOC separately
Stock Status (Core Tenet 2)	Assess each UOC separately	UOCs may be combined for assessment	UOCs may be combined for assessment
M&E (Core Tenet 3)	UOCs may be combined for assessment	UOCs may be combined for assessment	Assess each UOC separately
Environment (Core Tenet 4)	UOCs may be combined for assessment	Assess each UOC separately	UOCs may be combined for assessment

If a conflict should arise between a provision of Appendix 6 and another CSI scheme requirement, the CB should apply the latter.