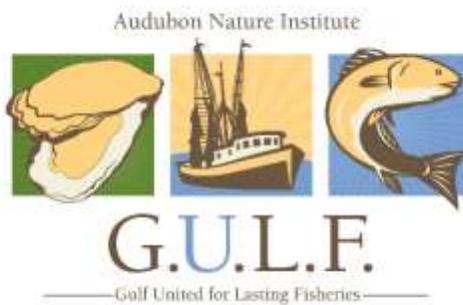


AUDUBON NATURE INSTITUTE
Gulf United for Lasting Fisheries
(G.U.L.F.)

Responsible Fisheries Management (RFM)
Chain of Custody
Standard



to verify products originating from a G.U.L.F.
RFM Certified Fishery

April 23rd, 2018
Issue 1.1

Based on the United Nations Food and Agriculture Organization's
Guidelines for the Ecolabelling of Fish and Fishery Products from
Marine Capture Fisheries and relevant articles of the 1995 UN FAO
Code of Conduct for Responsible Fisheries

Document Control, Approval and Issue

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Audubon G.U.L.F. RFM Chain of Custody Standard				
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FOREWORD

This Chain of Custody (CoC) Standard is an integral part of the Gulf United from Lasting Fisheries (G.U.L.F.) Responsible Fisheries Management (RFM) Certification Scheme. The G.U.L.F. RFM Certification Scheme is based on the substantive criteria contained within the Food and Agriculture Organization's Guidelines for the Ecolabelling of Fish and Fishery Products from Marine Capture Fisheries; and Inland Fisheries (originally published in 2005 and revised in 2009; and 2011, respectively) and clauses from the relevant Articles of the 1995 United Nations FAO Code of Conduct for Responsible Fisheries, as well as relevant documents from the International Organization of Standardization (ISO) and other sources. A full description of the standard-setting arrangements, normative references and processes can be obtained from Audubon Nature Institute (hereafter Audubon).

Audubon Nature Institute (Audubon)

Audubon Nature Institute's G.U.L.F. program was founded in 2012 from the need for a home-grown champion who understands and can advocate on behalf of U.S. Gulf of Mexico fisheries and industry. Our mission is to secure a vibrant future for Gulf of Mexico seafood through the use of science-based programs, education and outreach, to create a more stable and confident seafood industry.

For generations, our fisheries have prospered through judicious use, and the unique life cycle of our aquatic resources means that Gulf fisheries are very resilient. G.U.L.F. is dedicated to promoting and conserving the seafood resources in the Gulf of Mexico; we work to keep our industry relevant in the changing landscape of sustainability.

The purpose of the G.U.L.F. Responsible Fisheries Management (RFM) Certification Scheme is to provide U.S. Gulf of Mexico fisheries with a "Certification of Responsible Fisheries Management" to an internationally recognized standard. Certification to requirements under this scheme will demonstrate that fisheries are managed in accordance with internationally established practices provided by the UN FAO.

The Scheme has two complementary elements:

- The G.U.L.F. Responsible Fisheries Management Standard (G.U.L.F. RFM)
- The G.U.L.F. Chain of Custody Standard (G.U.L.F. CoC)

The G.U.L.F. CoC Standard is intended to verify products originating from a G.U.L.F. RFM certified fishery. This Standard is the direct result of proactive discussions and interactions with fishermen, packers, processors, markets, academics, regulators, standards and certification experts.

The certification and accreditation are based on ISO/IEC 17065:2012 standards, which ensure consistent, competent, and credible certification practices.

INTRODUCTION

The G.U.L.F. RFM Chain of Custody Standard sets out the requirements for Chain of Custody certification. Certification to the requirements defined in this Standard will demonstrate a commitment to customers and consumers that product originates from a certified U.S. Gulf of Mexico fishery.

The G.U.L.F. CoC Standard will be subject to continual review and improvement under the auspices of the G.U.L.F. CoC Technical Advisory Committee (TAC) to ensure that it continues to serve stakeholder and consumer needs.

DEFINITIONS

CoC (FAO definition): The set of measures which is designated to guarantee that the seafood product put on the market and bearing the ecolabel seal is really a product of designated origin and coming from the certified fishery concerned. These measures thus cover both the tracking/traceability of the product all along the processing, distribution, and marketing chain, as well as the proper tracking of the documentation and control of the quantity concerned. (FAO Guidelines for the Ecolabelling of Fish and Fishery Products from marine Capture Fisheries, Rome 2005 + 2009)

Applicant: A recognized entity in the supply chain that has applied to meet the G.U.L.F. Chain of Custody Standard through formal application process.

Certified Fishery: A fishery that has been independently certified as meeting the G.U.L.F. RFM Standard.

Certified Claim: A statement made by a certified entity approved and licensed for use by the standard owner.

Certification Mark: An approved logo or statement(s), which a certified entity may use to identify certified product.

CoC Registration Code: A G.U.L.F. Chain of Custody certificate registration code issued to each certified entity.

Subcontractor: A separate legal entity that is appointed to carry out work for the Applicant, which includes processors, packers, labelling, or other product transformation activities.

Service Provider: A separate legal entity that is appointed to carry out work for the Applicant, such as buyers, agents, transport services, distribution, and storage facilities that do not transform or relabel certified product.

OUTLINE OF THE PROCESS

Certification to the G.U.L.F. CoC Standard requires that independent on-site assessment (s) are conducted by an approved certification body. The Certification Body shall be approved by Audubon G.U.L.F. and shall be accredited to ISO/IEC: 17065 by an Accreditation Body who is a member of the International Accreditation Forum.

The applicant must demonstrate that they can trace certified product(s) back to a G.U.L.F. RFM certified source; either from a G.U.L.F. RFM certified fishery directly, or as part of a supply chain of organizations that hold a valid G.U.L.F. CoC certification.

Certification Options

Applicants can be either entities with a single facility or entities that wish to register multiple facilities which form part of the certification. Entities with multiple facilities are required to register each site within the application process.

Certification Stages

The certification process has a number of distinct stages described below.

Stage 1: Information Request

Entities within the supply chain of a certified fishery may request information from a Certification Body or Standards owner regarding the certification process.

Applicants may be:

- Processing vessel/Processing vessel group
- Primary Processor/Secondary Processor
- Trader (Dealer/Dock/Fish house)
- Sales/Marketing company
- Foodservice/Retailer/Restaurant

Service providers that do not take ownership of product and/or their responsibilities are defined by contract with a CoC certified entity may not require CoC certification themselves once their activities are included within the review of the contracting applicant entity.

Applicants are advised to carry out a self-assessment against the Standard in order to determine their readiness to apply for third-party certification.

Stage 2: Application Form

Applicants will be requested to fill out an application form describing their operations, fishery species handled and their supply chain and submit this to the Certification Body. The Applicant

is responsible for ensuring that all information provided in the Application is factual and accurate.

The Certification Body will provide information on the rules and regulations of the G.U.L.F. CoC Scheme and confidentiality associated with the applicant's information.

When a completed application form is submitted to the Certification Body, a unique CoC Registration Number is assigned to the Applicant.

Stage 3: Audit Plan

The Certification Body is responsible for creating the Audit Plan.

Each Applicant and its supply chain is unique; therefore, the Certification Body will develop a relevant audit plan to verify the Chain of Custody for the Applicant's specific product(s) and supply chain based on the information provided in the application form.

The Certification Body will provide the Applicant with an audit plan and cost estimate based on the information provided.

For applicants with multiple locations under a single entity, the initial and recertification audits will require audit at each physical location. For surveillance audits, the Certification Body, based on risk, shall determine the number of locations required for physical audit.

Stage 4: Audit

The audit of the Applicant's facility(ies) is carried out by an independent assessor approved and acting on behalf of the Certification Body.

The audit shall be communicated in advance and take place on a mutually agreed date. The key components of the CoC audit include:

- a physical inspection of premises, processes, products, packaging and labels
- an audit of the traceability related records and documentation that demonstrate that identification, separation and segregation processes of certified product are effective;
- an audit report that documents the above and identifies conformity/non-conformity and close out actions taken by the Applicant.

Stage 5: Audit Report

The audit report will be prepared during the audit documenting the Applicant's conformance to the G.U.L.F. CoC Standard. The audit report will identify any areas of both conformity and non-conformity and will be presented to the applicant at the end of the audit. Applicants will be required to provide evidence of corrective actions for identified non-conformances to the auditor within 28 calendar days from the close of the audit.

Stage 6: Certification Decision

The Applicant's audit report and, if required, a corrective action plan, will be submitted to a certification committee for a final certification decision.

The certification committee is appointed by the Certification Body and is composed of persons with equal competence to the auditor and expertise in certification.

Stage 7: Certification

The applicant will be awarded certification for its facility(ies) if it meets the criteria of the G.U.L.F. CoC Standard.

When certification has been approved, the Applicant shall be notified by email within five (5) days of the certification decision. Following this notification, a Certificate will be issued to the Applicant.

The Certificate remains the property of the Certification Body. Certificates are valid for three years with annual surveillance audits to confirm that the entity remains in conformance to the Standard.

The Applicant has the right to request an appeal of the certification decision of the Certification Body in writing within seven days of the notification of certification decision.

Stage 8: Access to Certification Mark/Claim

Certified entities can apply to Audubon G.U.L.F. for the use of a certification mark/claim. Only certification marks/claims approved by Audubon G.U.L.F. are eligible to signify certified products under the G.U.L.F. RFM Scheme.

Applicants may only apply for use of a Certification Mark/Claim once they have gained G.U.L.F. CoC certification.

G.U.L.F. RFM CHAIN OF CUSTODY STANDARD

For the certification of products coming from an RFM certified fishery, commencing post-capture and ending prior to consumption.

This Standard sets out the requirements for identification, tracing and tracking of certified product within the aforementioned scope for the purposes of marking a valid certification claim.

Structure of the G.U.L.F. RFM Chain of Custody Standard

The G.U.L.F. RFM Standard is divided into 4 sections:

- 1. General Requirements**
- 2. Traceability Requirements and Records**
- 3. Traceability Testing and Maintenance**
- 4. Labelling of RFM Certified Products**

These sections are in turn divided into clauses with specific assessment criteria.

1.0 General Requirements

1.1 The Applicant shall be able to track and trace certified product one step forward and one step back to an RFM certified source.

1.2 A documented policy stating the Applicant's commitment to the G.U.L.F. RFM Chain of Custody Standard shall be provided by the Applicant.

1.3 Certified product shall be kept separate from non-certified product for a certification claim to be made.

1.4 The applicant shall use a coding system to enable the identification and separation of batches of certified products throughout each stage of the process from delivery to dispatch and identification of products distributed in the supply chain intended for further chains of custody and for making a certification claim.

1.5 Contract processing, packing or labelling activities utilized by the Applicant shall be separately audited to the G.U.L.F. CoC Standard.

1.6 For all contract services that do not take ownership of product, a written contract or other documentation of equivalence shall be provided that demonstrates a commitment to maintaining certified products separate and identifiable.

2.0 Traceability Requirements and Records

2.1 The following minimum information (from records and documentation) shall be available for each product included in the scope of the G.U.L.F. CoC certification and shall be traceable from intake to dispatch and back to the certified fishery:

- Accepted market name
- Name and address of supplier
- Supplier G.U.L.F. CoC registration number (or G.U.L.F. RFM Fishery certificate number)
- Production records

2.2 Throughout handling, processing, distribution and marketing, certified products that intend to carry the official certification mark/claim shall be kept identifiable and segregated from non-certified products. This may be achieved by:

- Physical separation;
- Temporal separation;
- A system that clearly prevents loss in identification and traceability such as mixing with non-certified products.

2.3 Products are not eligible to carry the official certification mark/claim if certified and non-certified seafood of the same species is mixed.

2.4 Compound products (e.g. ready meals with multiple seafood products): These may contain non-certified seafood ingredients where the certified seafood ingredients shall be 95% or more by weight of the total seafood ingredients in the final product.

2.5 The applicant shall ensure that traceability records are accurate, legible and unadulterated and be kept for a period to correspond with the shelf life of the product and a minimum of three years.

3.0 Traceability Testing and Maintenance

3.1 The applicant shall have a documented product withdrawal and retrieval procedure or corrective action procedure for notification of nonconforming product in the supply chain.

3.2 The system shall be tested by the Applicant to ensure traceability can be determined from incoming product to finished product, and vice versa, for each G.U.L.F. CoC certified product handled. This testing shall:

- be carried out at least annually;
- include a quantity check/mass balance;
- traceability challenge (backwards and forwards);
- be documented and the results shall be retained for inspection

3.3 In the event of a non-conforming product being released into the supply chain, the product withdrawal system or corrective action procedure shall be activated, the event fully documented, and the Certification Body notified.

3.4 A documented procedure shall be implemented for handling non-conformities raised during audits (external and internal) to this Standard. Records of non-conformities shall include:

- Clearly documented details of the non-conformity;
- Identification of the person responsible for addressing non-conformity;
- Clearly documented corrective action;
- Documented time-scale for correction;
- Documented verification that the corrective action(s) have been implemented and the non-conformity(ies) closed.

3.5 A documented record of customer enquiries and their handling concerning certified product shall be maintained by the Applicant.

3.6 Relevant personnel shall be competent by training or job experience in the operation of the traceability systems and knowledgeable in the requirements of this Standard.

4.0 Labelling of RFM Certified Products

4.1 Only an official Audubon G.U.L.F. RFM Mark/Claim can be used on certified products to represent G.U.L.F. RFM certification.

4.2 The Applicant must only use a certification mark/claim when it has documented evidence demonstrating that it has been granted approval to do so by the standard owner.

4.3 Packaging that carries a G.U.L.F. RFM Mark/Claim shall be controlled and accounted for such that a mass balance reconciliation can be performed to demonstrate certified product packed.

4.4 A secure system for the production, storage and application of product labels bearing a certification mark/claim, to ensure only certified product is labelled as such shall be operated by the Applicant.

APPENDIX 1

Minor clarification updates to Chain of Custody Standard, v. 1.1 October 9,2017, approved and published as Chain of Custody Standard, v 1.1, April 23, 2018.

SECTION/CLAUSE	CHANGES	PAGE
Intro, Stage 5	CHANGED requirement to respond to non-conformances from 'a specified timeline' to '28 calendar days'	9
Intro, Stage 6	Wording adjusted for clarification, removed 'if necessary', and added 'if required'.	9
Intro, Stage 7, 3 rd paragraph	ADDED 'Annual' in front of surveillance audit	9
Clause 1.5	DELETED Labeling of products shall be in compliance with applicable national/federal and/or regional/state regulations. Adjusted numbering for 1.6 and 1.7 to 1.5 and 1.6 accordingly	10
Clause 2.3	Original clause 2.3 broken into clauses 2.3 and 2.4 to distinguish between single species seafood products and mixed seafood products. Adjusted numbering for 2.4 to 2.5 accordingly.	11
Clause 2.4 (now 2.5)	ADDED- three-year minimum requirement to maintain records	11