

Seafish Responsible Fishing Ports Scheme

Application to Certification – Process
[DRAFT]

1 – Introduction and Purpose

The Responsible Fishing Port Scheme (RFPS) is a voluntary programme that demonstrates responsible food safety and good operational practices within fishing ports and fishing harbours. Certification to the RFPS includes an independent audit to demonstrate that a port or harbour and those organisations that operate within it are following best practice in five (5) core areas: Food Safety and Structural Integrity, Working Environment, Care for the Environment, Care of the Catch, and Seafood Traceability.

This document defines the procedures to be followed during the application of a port to the RFPS. The purpose of these procedures is to ensure that all applicant ports are treated in a consistent, fair and professional manner, and to inform all organisations involved in the process of their roles and responsibilities. The procedures also allow Certification Bodies to determine the best way to incorporate the RFPS process into their existing operational frameworks.

2 – RFPS Scope

The RFPS defines four categories of fishing port, based on the facilities available on the site. Application to certification is limited to any commercially registered Category 3 or Category 4 fishing port or fishing harbour with a designated selling or auction facility that supplies the UK seafood market. The broad definitions for these categories of fishing port are as follows:

- Category level 3 Port – Fishing ports that are registered with their local authority, have a quay to allow fishers to land their catch, have facilities to store the catch, and conduct sales directly to the supply chain.
- Category level 4 Port – Fishing ports that are registered with their local authority, have a quay to allow fishers to land their catch, have facilities to store the catch, and conduct sales directly or by auction to the supply chain.

Category 1 and Category 2 ports, which are all those fishing ports that do not conduct sales directly to the supply chain, are outside of the scope of RFPS and are not permitted to apply for certification. It has been agreed to develop a separate standard for small ports (category 1 and 2) during next Seafish corporate Plan.

All applicants to the RFPS must use official RFPS documentation and follow the RFPS procedures as described here and in other official RFPS documentation. Applicants must meet the requirements of the RFPS Standard as assessed by a recognised and approved CB. In the event of a legal requirement that is in opposition to an RFPS requirement or procedure, the legal requirement must take precedence.

3 – Enquiries and Requests to Application

All Certification Bodies (CBs) must designate a staff member as the CB Programme Manager or Administrator. This staff member must be fully trained in the processes and procedures of the RFPS, particularly the application process, and also the requirements of the RFPS Standard. The CB Programme Manager/Administrator will be the first point of contact for applicants to the RFPS

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programme, and all enquiries and requests to application must be directed to them in the first instance.

The CB Programme Manager/Administrator will provide requested information on the RFPS to the enquirer/applicant, including but not limited to the details of the application and assessment process, the requirements of the Standard, the scope of the assessment, time frames, and costs. The CB PM/A will also answer any questions potential applicants may have in relation to the scheme. If the applicant wishes to proceed with an application, the CBPM/A will provide them with an information bundle which includes the official RFPS application form, details of the application process including the pre-assessment documentation list, and a comprehensive list of the RFPS Standard requirements. The CB PM/A will continue to support the applicant with the provision of information as required, but no formal initiation of the application process will occur until the CB receives a completed official RFPS application form. No other forms of application will be accepted by the CB.

4 – Application Processing

On receipt of the official RFPS application form, the date of receipt and an outline of the timeline along which the application and certification procedure will progress must be entered into the CB's database. The CB will conduct an initial review of the completed application form to inform the creation of an appropriate assessment plan for the applicant. If necessary, the CB will continue to communicate with the applicant to obtain any additional information required to complete the plan. A key component of the plan is an estimate of the total cost to the applicant of all stages, including the pre-assessment, site visit, and post-visit analysis and certification decision. The assessment plan should also outline the intended timings and process of each of the key stages of the application procedure as described in this document. Once completed, the assessment plan will be sent to the applicant in order for them to make a final decision to apply to the scheme.

The details of the assessment plan are subject to change as deemed necessary by circumstances arising during the application and assessment process. However, all applications and assessments must always meet the requirements of the RFPS policies and procedures.

5 – Assessment Resource and Scheduling

All port assessments, including the pre-assessment and site visit, must be conducted by an approved Assessor. This Assessor must have knowledge of the RFPS and the associated policies and procedures, and must also be trained or have experience of similar assessments including on-site audits. Subcontractors may be used, but the same requirements apply in relation to their knowledge and expertise. Details of the Assessor, including their name and a summary of their qualifications, must be provided to the applicant as part of the assessment plan.

The assessment plan must also contain the assessment timeline, completed with as much specificity as possible. In particular, a period of time during which the on-site audit will occur should be highlighted, to allow discussions between the CB and the applicant to finalise a specific date(s). The applicant will review the assessment plan and, if they wish to continue with the application, will return to the CB with confirmation of such.

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On receipt of this confirmation, the CB will issue a letter to the applicant confirming the specific date of the site visit, an assessment agenda, and a copy of the CB's certification protocols. Confirmation of the date(s) of the site visit should also include a discussion on the logistics of the visit, ensuring that there is agreement between the applicant and the CB in relation to flights, car rental, hotels, and meals as applicable. Once confirmation and agreement of the assessment plan is obtained, the applicant will be recognised by the CB and by the Standard Holder as a formal Applicant to the RFPS.

6 – Pre-Assessment Process

Prior to the on-site audit, the CB must complete a remote pre-assessment. The timing and procedure of the pre-assessment should be included in the assessment plan drafted at the outset of the application process. The majority of the information required for completing the pre-assessment will be provided by the Applicant as part of the application form; however, the CB should continue to communicate with the Applicant as and when necessary should further information be required.

Site visits must be scheduled to occur within 12 months of the pre-assessment being completed. If there is a delay in the site visit, the new date must also be within 12 months of the pre-assessment being completed. If the site visit has not occurred within 12 months of the completion of the pre-assessment, the pre-assessment must be repeated before the site visit can be conducted, which may cause the Applicant to incur additional costs.

The main purpose of the pre-assessment is to minimise the duration of the site visit by enabling the Assessor to review remotely the Applicant's documentation in advance of the site visit. This allows the Assessor to ensure the Applicant meets many of the RFPS Standard requirements, and may also be used by the Assessor to highlight any areas for particular attention during the site visit.

The documentation provided by the Applicant port must be compared by the Assessor to the pre-assessment requirements. These are formulated using the RFPS Standard and represent requirements that can be met remotely through the provision of information and documentation. It is not necessary to meet all of the pre-assessment requirements prior to the site visit taking place, but any pre-assessment requirements which are not met must form a key focus of the site visit process. If the Assessor believes that the evidence provided to complete the pre-assessment is inadequate to indicate that the Applicant is likely to be able to meet the full RFPS Standard requirements, the Assessor should, in the first instance, contact the Applicant for further information and clarification, as appropriate. If, after further discussion, the Assessor concludes that the Applicant will not be able to meet the full set of RFPS Standard requirements, the site visit may be postponed or cancelled, at the Assessor's discretion.

Whether using evidence obtained during the pre-assessment or the site visit, no Applicant shall be awarded RFPS certification until the Assessor has concluded that all RFPS Standard requirements have been met to a level defined as adequate according to the process described later in this document.

Documentation to be provided during the initial application process and used as evidence for conducting the pre-assessment (and the associated RFPS Standard clause(s)) includes:

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- A Memorandum of Understanding (MoU) between the associated member organisations of the Applicant group. Details of the required contents of this MoU are provided in the RFPS Standard and the pre-assessment requirements.
- The Applicant's HACCP or HACCP-style plan.
- The Applicant's policy on environmental emissions
- The Applicant's Food Safety Management Plan (FSMP) (1.1)
- The Applicant's cleaning schedule and cleaning policy (1.4.1; 1.4.5; 1.4.6)
- The Applicant's policy on eating, drinking, smoking and spitting (1.5.7) and, if separate, the personal hygiene checking policy (1.5.10)
- The health questionnaire required to be completed by staff and visitors (1.5.9)
- The Applicant's pest control policy and procedure, and pest control manual (1.6.1; 1.6.4)
- The Applicant's food protection policy statement and plan (1.7.1)
- The Applicant's loading/unloading management plan (1.7.7)
- Documentation to demonstrate compliance with ports legislation (2.1)
- The Applicant's employee training and performance policies (2.5; 2.6)
- An outline of the Applicant's induction training procedure (2.8)
- The Applicant's Health and Safety documentation (2.12)
- The Applicant's complaints procedure (2.13)
- Procedures for the maintenance of any port-owned vehicles (2.17; 2.18)
- Documentation evidencing the legality of all employment relationships, including those with external contractors (2.19-2.27)
- Documented environmental risk assessment and an associated Waste Management Plan (WMP) (3.1; 3.2)
- Applicant's weighing procedures (4.4)
- The Applicant's policy on undersized fish and adherence to the landings obligation (4.6)
- The Applicant's documented traceability procedure (5.1.1.1 – 5.1.1.5)

With the exception of the MoU, where any of these documents are available only in hard copy, if there are confidentiality issues, or if for any other reason the Applicant is unable to provide them to the Assessor prior to the completion of the pre-assessment, the relevant documentation must form a focus of the on-site assessment visit. It is in the interests of the Applicant to provide as much of this documentation as possible in order to minimise the duration of the site visit.

The MoU forms a mandatory component of the pre-assessment process and must be submitted before the application process can continue.

The results of the pre-assessment must be used to further refine the on-site assessment plan. The on-site assessment should focus on any requirements which have not been demonstrated to be met by the documentation provided during the pre-assessment. This includes any pre-assessment requirements not met, and also the remainder of the RFPS Standard requirements.

7 – On-Site Assessment Process

The duration of the on-site assessment will be dependent on the amount of information provided during the pre-assessment, and the number of requirements deemed to have been met during the

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same. A typical on-site audit could be expected to last between 1 and 2 days. The Assessor must use the results of the pre-assessment to provide the Applicant with an estimate of the on-site assessment duration prior to the event; however, the final duration of the on-site assessment is at the discretion of the Assessor. If the pre-assessment or on-site visit reveals unique or unusual risks or circumstances, this may result in a longer on-site assessment. During the on-site visit the Assessor must comply with any visitor procedures put in place by the Applicant.

The fundamental structure of the on-site assessment is as follows:

1. Hold opening meeting to confirm the scope of the assessment and explain the procedure of the assessment.
2. Review the Applicant's documentation. This must include all documents listed above, but should focus in particular on any documentation not received as part of the pre-assessment process.
3. Inspect the Applicant facilities. This must include all parts of the Applicant port necessary to allow the Assessor to come to a conclusion in relation to all RFPS Standard requirements.
4. Conduct final review of findings in preparation of the closing meeting.
5. Closing meeting to discuss findings and the extent to which the Applicant meets the RFPS Standard requirements.

These five key stages are mandatory, but the Assessor may choose to conduct additional stages deemed necessary in order to reach a firm conclusion in relation to the RFPS Standard requirements (for example, the documentation may be re-examined after stage 3).

The Assessor shall use stages 2-4 to determine the extent to which the Applicant meets the RFPS Standard requirements, using the official RFPS assessment template. The Applicant must provide a representative who will provide access to documentation and guide the Assessor around the facility as required. Each of the requirements in the assessment template, which are derived directly from the RFPS Standard, must be awarded one of the following conformance levels:

Pass – The Applicant meets this RFPS Standard requirement.

Minor Non-Conformity – The Applicant fails to meet this requirement, but not substantially. A Minor Non-Conformity does not prevent the Applicant from being certified to the RFPS Standard, but will be a focus of the subsequent surveillance audit.

Major Non-Conformity – The Applicant fails to meet this requirement in a substantial way. A Major Non-Conformity must be resolved before the Applicant can be certified to the RFPS Standard.

One additional non-requirement-specific conformance level is possible:

Critical Non-Conformity – There is evidence of a severe deviation from the specific or general requirements of the Standard, such that there is a direct and adverse effect on food safety or health and safety; or if the Applicant is observed to have broken any other legal obligation. This does not necessarily need to relate to a specific requirement in the Standard, but the details of the critical non-conformity must be detailed by the Assessor. In the event of a Critical Non-Conformity, the assessor will end the on-site assessment immediately. The CB must not grant certification to the

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Applicant, and any future applications to the programme by the Applicant must include evidence of the policies and/or systems put in place to ensure the Critical Non-Conformity does not re-occur.

Prior to the end of Stage 4 of the on-site assessment process listed above, the Assessor must prepare their findings in relation to the potential conformance levels described. The purpose of the closing meeting is for the Assessor to present these findings and seek concordance in regard to any identified non-conformities. As a result of this concordance, the Assessor will prepare a written, signed copy of the non-conformities and provide this to the Applicant's representative. The Assessor will not provide an indication of whether the applicant will be awarded certification at the time of the closing meeting, or at any other point during the on-site assessment.

8 – Surveillance Assessments

Once an applicant is certified against the RFPS Standard, they will become a Member of the scheme. Membership is dependent on continuing to meet the RFPS Standard requirements, as evidenced by the completion of a successful surveillance assessment at least once every 3 years. The majority of the surveillance process proceeds according to the application procedure, with the exception that the full application form does not need to be completed.

9 – Assessment Reporting

Where major non-conformities were identified during the on-site assessment, these will have been highlighted to the Applicant during the closing meeting, and further details can be provided by the CB on Applicant request. The Applicant must provide evidence to the CB to demonstrate that these major non-conformities have been dealt with prior to the production of a final assessment report. Depending on the nature of the non-conformity, this evidence may take the form of documentation provided to the CB after the site visit, or it may be necessary to schedule a follow-up site visit. Applicants must provide such evidence to the satisfaction of the Assessor within 28 days of the on-site assessment.

After the completion of the pre-assessment and on-site assessment, the CB will produce an assessment report, using the formal RFPS template. If no major non-conformities are identified, this report can be completed immediately. If major non-conformities are identified, the report can be completed once these are closed off as described in the previous paragraph, or 28 days after the site visit, whichever is the earliest.

The assessment report will include a general summary, a summary of the scores achieved by the Applicant against each RFPS Standard requirement, a summary of any non-conformities and any follow-up actions taken, and an assessment determination explaining whether the Applicant has been successful in seeking RFPS certification. This assessment report is submitted by the Assessor to the CB's RFPS Programme Manager/Administrator. The PM/A will confirm that the report has been completed according to the procedures described in this document, and also according to the CB's own internal procedures. The PM/A will also review the conformance findings and final assessment determination.

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If the PM/A agrees with the contents of the report, the final assessment determination shall be as defined in the report. A copy of the report and the clear certification decision will be provided to the Applicant within 3 working days of this final decision being reached.

10 – Issuance of Certificates

Successful Applicants will be issued with an RFPS certificate by the CB. The certificate must follow the RFPS Standard's approved format and will include, as a minimum, the following information:

- Certification Body's name and address
- Applicant name and mailing address
- Applicant location, if different to mailing address
- On-site assessment date
- Certification Issue date
- Certification Expiry date
- Authorising signature

The certificate will remain in the possession of the CB. Any substantial changes to the facilities or procedures of the Applicant, which might affect the certification, must be reported to the CB and may require further investigation or assessment before the certification can be maintained.

11 – Maintenance of Records

The CB must review the Applicant's file 30 days after the completion of the application process in order to ensure that all necessary documentation is present. If there are any documents missing, the CB must follow this up with the Applicant or other relevant organisation to ensure the file is completed. The file must contain the following documentation, maintained for a minimum of 5 years:

- Application form and associated documentation
- Assessment plan
- Site visit confirmation correspondence
- On-site assessment schedule
- Assessment report
- Correspondence on non-conformities, including rectifying actions
- Certificate(s)