



# Responsible Fishing Ports Scheme (RFPS)

## **User Guide**

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## 1 – Introduction to the User Guide

This document is a User Guide for the Responsible Fishing Ports Scheme (RFPS). It is designed to explain the most important parts of the RFPS in an easy-to-understand way.

The User Guide contains four main sections:

- 1. An introduction to the RFPS, including what the scheme is for and where it comes from
- 2. An explanation of the application process, from first contact to certification
- 3. An explanation of the most important stage of the application process: the on-site audit
- 4. An explanation of the way the RFPS modules work, and how to decide which requirements apply to your port

The User Guide also includes a long Appendix which looks at every clause in detail and explains what the auditor will be looking for.

The aim of the guide is to make sure that you understand what the RFPS is, how to apply, and what you need to do to make sure your application is successful.

This User Guide is based on the official RFPS documentation. The official documents are the result of a complicated system of review, revision and approval, and are used by Seafish to run the RFPS programme.

The User Guide never contradicts the information in the official documents, but to make sure it's easy to understand it does leave out some of the detail. Throughout the User Guide there are notes to tell you which official document you should look at if you need more information on a topic.

The official RFPS documents can be obtained from Seafish and include:

- The RFPS Standard available on the Seafish website
- The RFPS Code of Practice available on request
- The RFPS Control Manual available on request

Further information can be found on the Seafish website.

## 2 – What is the RFPS?

The Responsible Fishing Ports Scheme (RFPS) is a voluntary programme that lets fishing ports and harbours in the UK show that they follow industry best practice. It was developed by the UK seafood industry to raise standards across the fishing ports sector.

The key objective of the RFPS is as follows:

"The Responsible Fishing Ports Scheme shall promote and encourage responsible operating practices within UK fishing ports and harbours to give greater assurance and transparency to buyers and users of seafood sold through UK fishing ports"

The most important part of the RFPS is the RFPS Standard. The standard lists all of the things a port needs to do before it can be certified.

The RFPS uses third party certification. This means that the decision about whether a port meets the requirements listed in the standard is made by an independent third party called a Certification Body (CB). There is a well-defined application process which the CB uses to reach its decision.

#### 2.1 – How the RFPS was created

The RFPS was started because of a growing demand within the UK seafood to better understand the way fish is handled and processed by fishing ports in the UK.

In 2015, Seafish and the British Ports Association Fishing Ports Group (BPAFPG) consulted a range of fishing ports and other organisations within the seafood supply chain. This started the discussion on how best to develop a process by which this assurance and transparency could be provided.

After continuing discussions, public consultations, and trial audits, a version of the RFPS standard was launched in 2018 which was applicable only to ports with fish markets. However, in the background, work continued to make sure the RFPS could be used by any UK fishing port.

In 2020, a final version of the standard was created which is suitable for all UK fishing ports. This new RFPS standard includes all of the same requirements that the 2018 standard did, but uses modules to make sure ports are assessed only in areas that are relevant to the way they operate.

More information about the background of the RFPS and how it was created can be found on the <u>Seafish website</u>.

## 2.2 – The RFPS Standard

The RFPS Standard contains nearly 200 requirements. The requirements, or clauses, are divided into the following five Core Principles:

- Food Safety and Structural Integrity
- Working Environment
- Care for the Environment
- Care of the Catch
- Seafood Traceability

The Core Principles apply to varying degrees across all types of fishing port. Ports vary in scale, in the facilities they possess, and in the activities they carry out. The RFPS standard recognises this variability and the auditor will take account of the size and type of port, and the activities carried out, when they decide whether a requirement is met.

Some of the clauses in each Core Principle apply to all fishing ports. These clauses are called 'Universal Clauses'. However, other clauses apply only to ports with certain characteristics. Clauses that are not 'Universal' are grouped into five modules:

- Internal Catch Area
- Market / Sales Area
- Staff
- Vehicles
- Catch Handling Area

Every port needs to meet the 'Universal' clauses. It is important to decide which other modules apply to your port so that you can prepare the evidence you need to show that you meet the clauses in those modules.

Section 5 of this User Guide looks at the modules more closely and explains how to decide which apply to you.

The RFPS recognises that UK fishing ports vary greatly. To reflect this, the RFPS requirements are designed to be as flexible as possible while still requiring genuine action. Rather than assuming risks are identical at every port, the standard asks applicants to <u>identify</u> the potential risks posed by their own specific circumstances and <u>mitigate</u> these potential risks through their own specific set of actions.

This means that rather than having to apply defined measures under all circumstances, you are encouraged to conduct internal assessments and audits and use the results to develop actions and procedures that work for your own situation. The results of this are explained in detail in Appendix 1 of this User Guide, where each clause of the RFPS Standard is considered individually.

## 2.3 – The Assessment Process

Ports applying to the RFPS are assessed by an independent Certification Body (CB). The CB uses a two-step process to decide whether the port meets all the relevant requirements listed in the standard. These two steps are:

- 1. A review of the port documentation, carried out remotely.
- 2. An on-site audit carried out by a qualified auditor.

After both assessment steps have been carried out, the CB uses rules set by the standard holder (Seafish) to decide whether the port meets the requirements in the RFPS Standard. If the port meets the requirements, it is awarded an RFPS certificate.

A more detailed explanation of the assessment and certification process is provided in Section 3 of this guide.

## **3 – The Application Process**

There are six steps in the application process for certification to the RFPS. These are:

- 1. Make sure your port is eligible it needs to be a UK port at which fish is landed.
- 2. Contact the Certification Body to get all the RFPS documentation and start planning the application process.
- 3. Prepare your application, particularly all of your risk assessment and procedural documents.
- 4. The pre-assessment, which the CB will carry out using the information you sent them.
- 5. The on-site audit, which the CB will carry out on a date you agree with them.
- 6. The certification decision, which is made by the CB based on all the other stages of the process.

## 3.1 – Eligibility

The current version of the RFPS applies to all UK fishing ports. This includes any port where fish is landed. If, for any reason, you are not sure whether your port is eligible for certification against the RFPS, you should contact the Certification Body for clarification.

#### 3.2 – Contact the Certification Body

Applicant ports first contact the RFPS Certification Body (CB), which is currently Lloyd's Register. The CB will provide you with all the information and paperwork you need to complete your application, including a copy of this guide.

The CB is responsible for carrying out all other stages of the application and certification process, according to the rules and procedures put in place by the standard holder (Seafish)

The CB will also provide you with a draft Assessment Plan. This plan explains the timeline of the assessment process and includes details of the auditor who will be responsible for carrying out your on-site audit. You will be able to work with the CB to finalise the details of the plan, including the date of the site visit.

One other important thing that will be estimated at this stage is the cost. The CB will charge a fixed price for the application as a whole, plus an additional fee per day of the on-site audit. For this reason, it is in your interest to provide the auditor with accurate and comprehensive information during the remote documentation review, as this may reduce the overall cost.

Although the final total fee depends on the duration of the site visit, rates are listed on the Applying for Responsible Fishing Scheme certification page on the <u>Seafish website</u>.

Although the CB must follow the RFPS rules and procedures, they are operationally independent of Seafish. Seafish does not play a role in deciding whether a port has met the RFPS requirements, or whether it should be certified.

Seafish will usually not be directly involved in your application unless you believe the CB has acted unfairly or has not followed the RFPS rules. If this happens, there is a complaints procedure which you can follow.

Acoura can be contacted via:

- Tel: 0131 335 6613
- Email: rfps-ca@lr.org

## 3.3 – Prepare the Application

To complete the remote document review (known as a 'pre-assessment'), the CB needs a wide range of information. The more of this information you are able to provide the better. If you can provide all the information listed below, it could mean your on-site audit is quicker.

Most of the information needed for the pre-assessment is one of two types of document:

- 1. Evidence of risk assessments you have carried out
- 2. Evidence that you have put policies and procedures in place to reflect the outcomes of the risk assessments.

Each document relates to one or more requirements from the RFPS Standard. If you don't provide a document in advance you will usually still be expected to show it to the auditor during the on-site audit.

The main documents which every port should aim to send to the CB are listed below. Each document also indicates the part of the RFPS standard it is linked to.

The documents are:

- Your HACCP or HACCP-style plan (relevant throughout the standard).
- Your cleaning schedule and cleaning policy (1.5.19)
- Your policy on eating, drinking, smoking and spitting (1.6.4)
- Your pest control policy and procedure, and pest control manual (1.7.1; 1.7.2; 1.7.4)
- Your food protection policy statement and plan (1.8.1)
- Documentation to demonstrate compliance with ports legislation (2.1)
- Your Health and Safety documentation (2.3)
- Documentation evidencing the legality of all employment relationships, including those with external contractors (2.6.4-2.6.15)
- Documented environmental risk assessment and an associated Waste Management Plan (WMP) (3.1.1; 3.1.2)
- Your policy on environmental emissions (3.4.1)
- Your policy on undersized fish and adherence to the landings obligation (4.7)
- Your documented traceability procedure (5.1.1 5.1.6.)

All the documents listed above are needed by every RFPS port applying to be certified. However, the RFPS uses a modular approach to make sure that ports need to meet only requirements that are relevant to them. This means that there might be other documents that you need to provide, depending on what activities are carried out at your port.

If the Internal Catch Areas module applies to your port, you will need to provide:

- Your personal hygiene checking procedure (1.6.9)
- Your requirements relating to the personal health of visitors and rules for their personal hygiene prior to entering the fish selling area (1.6.7)

If the Staff module applies to your port, you will need to provide:

- Your employee training and performance policies (2.2)
- An outline of your induction training procedure (2.2.6)
- Your Worker Welfare Self Declaration (2.6.1)
- Your grievance procedure (2.6.13)

If the Vehicles module applies to your port, you will need to provide:

• Your procedures for the maintenance of any port-owned vehicles (2.5.3)

If the Catch-Handling Areas module applies to your port, you will need to provide:

- Your size grading specifications (4.3.1)
- Your weighing procedures, including calibration of scales (4.5.1)

The modular approach is explained in more detail later in Section 5 of this User Guide, including how to decide which modules apply to your port.

In addition to everything listed above, there is one final document you might also need to provide. This document is the 'Memorandum of Understanding (MoU)', and is slightly more complicated.

The RFPS defines the port authority as the 'core applicant'. Depending on the specific circumstances at the port, the port authority might choose to remain the sole applicant by taking direct responsibility for making sure all of the clauses of the standard are met.

The alternative approach is to make a group application along with other organisations (such as fish merchants) at the port. One potential advantage of this is that it involves the organisations directly responsible for meeting some of the RFPS requirements.

The decision is entirely yours, and depends on the way you manage your port and the activities that occur there.

As part of the application process, you will be asked to declare which of the two options you have chosen. If the port authority takes responsibility for all of the requirements, it will be the sole applicant. This doesn't mean that the port authority has to be directly responsible for every requirement in the standard, but they do need to apply rules and regulations to ensure that other organisations operating at the port meet the requirements.

If you decide that one or more other organisations will be responsible for ensuring some sections of the RFPS are met, those organisations will be co-applicants. All co-applicants must sign an MoU which sets out who is responsible for each section of the RFPS Standard. A draft MoU that you can use for this purpose is available to download from the <u>Seafish</u> website.

If you have decided to proceed with co-applicants, the MoU is mandatory and must be provided to the CB before the pre-assessment can take place.

## 3.4 - Pre-Assessment

The CB will use the information you provide to carry out a pre-assessment. The auditor uses the pre-assessment to gain an understanding of the way your port operates, and to get an idea of the types of activity and risks present at the port.

This allows the auditor to finish planning the on-site audit, and reduces the chance they'll need additional time (at your expense) during that stage of the application process.

The auditor uses the pre-assessment to decide which areas to focus on during the on-site audit. This will include any areas where they have concerns that the RFPS standard might not be being met, plus any areas where you did not send all of the information listed in section 3.3 above.

One final thing to note about the pre-assessment is that it remains valid for 12 months. This means that you can delay the on-site audit if you need to, but if it is delayed for more than a year, you will need to re-start the application. This means repeating everything from the start, including paying the application fee again.

## 3.5 – On-site Audit

After the pre-assessment, the CB will arrange a date with you to carry out the on-site audit. This is the most important stage of the application, and is described in detail in section 4.

If the *Internal Catch Areas* module applies to your port, you should make sure to implement your visitor procedures with regards to the auditor during the on-site audit! Specifically, the procedures referenced by clauses 1.6.1, 1.6.7, and 1.6.9 of the RFPS Standard.

## 3.6 – Certification Decision

After the on-site audit, the auditor will write up an assessment report. The CB will use the report to decide whether to certify the port. The decision will be based on the policies and rules set by Seafish, but Seafish does not have a direct say in the decision.

Although it is sometimes more complicated, the basic rule is that if the auditor thinks the port meets all of the requirements in the RFPS Standard, the port will be certified. You'll receive a

copy of your certificate, which will contain details including the issuance and expiry dates. Holding a certificate makes you a Member of the RFPS scheme.

The certificate is valid for three years, although you will need to pass annual surveillance assessments. Surveillance assessments are similar to the full application assessment, except that the pre-assessment becomes a simple matter of checking whether anything has changed. Additionally, if you aren't awarded any non-conformities<sup>1</sup> during your first assessment, the CB might decide that you don't need to have an on-site audit as part of the surveillance process.

There is a fee associated with the surveillance assessment, which is also listed on the Applying for Responsible Fishing Ports Scheme certification page on the <u>Seafish website</u>.

<sup>&</sup>lt;sup>1</sup> Section 4 explains what a non-conformity is, and what it means if you are awarded one.

## 4 – The On-Site Assessment

The on-site assessment is the most important part of the application process. During the onsite assessment, an auditor from the CB will look at all the areas of the port that are relevant to the RFPS Standard. This section explains exactly what to expect during the on-site audit.

One module in the RFPS standard is the *Market/Sales Area* module. The requirements in this module relate to the fish market, which means that if the module applies to your port the auditor will need to be able to see the market in operation for at least part of the on-site audit process. You should consider this factor when discussing with the CB when the audit will take place.

## 4.1 – The Audit Process

The RFPS audit process follows the rules set out in ISO 17065 ("Conformity Assessment – Requirements for bodies certifying products, processes and services"). If you have been involved in an audit that follows the ISO 17065 rules in the past, you will be familiar with the RFPS on-site assessment process.

The on-site assessment includes the following steps:

- 1. An opening meeting, during which the auditor will explain what they're going to do.
- 2. A review of your documentation. The auditor might ask questions about the documents you sent them as part of the pre-assessment, or they might ask to see any documents you weren't able to send them.
- 3. An inspection of your port. The auditor will look at all the areas relevant to the standard, but might not cover them in the same order that the standard does.
- 4. The auditor will conduct a final review of their findings and prepare for the closing meeting.
- 5. A closing meeting, during which the auditor will explain their findings and tell you whether there are any RFPS clauses they think you don't meet<sup>2</sup>.

Stages 2 and 3 could happen in either order, and the auditor might ask to see documents as a result of something they see during the inspection stage or vice versa.

During stage 5, the auditor will explain the outcomes of the assessment and you will have an opportunity to provide more information if you think they've missed anything. However, the auditor will not be able to tell you whether or not you will be certified – you will have to wait until the formal certification decision has been made by the CB.

Appendix 1 of this User Guide provides an explanation of what the auditor will be looking for when they assess each clause. It's a lot of information and you don't need to read it all – it's better to use it as a reference guide to get more detail about any specific clauses you're not clear on.

<sup>&</sup>lt;sup>2</sup> Note: Just because the auditor has decided that there are one or more RFPS requirements that the port doesn't meet does not mean the port can't be certified. Section 4.2 explains how this in more detail.

You will need to make someone available throughout the on-site assessment process to show the auditor documents, guide them around the facility, and answer any questions they have.

## 4.2 – Compliance ratings

During the on-site assessment, the auditor will consider every clause in each applicable module. They will then assign one of the following conformance levels to each clause:

- **Full Compliance** The port meets this RFPS Standard requirement.
- **Minor Non-Conformity** The port fails to meet this requirement, but not substantially. A Minor Non-Conformity does not prevent you from being certified, but it will be a focus of your next audit.
- **Major Non-Conformity** The port fails to meet this requirement in a substantial way. A Major Non-Conformity must be resolved before you can be certified.
- **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 port is observed to have broken any legal obligation which puts food safety, employee safety, or worker welfare at risk.

A Minor Non-Conformity does not prevent you from being certified. However, at the time of the next audit (whether that audit is a surveillance audit or a full re-assessment), any areas that were previously awarded a Minor Non-Conformity will be looked at more closely by the auditor. If the auditor decides the port still falls short of Full Compliance, they will change it to a Major Non-Conformity. This would mean you would need to fix the problem immediately if you want to remain certified.

Critical Non-Conformities are very rare. If the auditor decides there is a Critical Non-Conformity, they will end the on-site assessment immediately. The CB will not certify a port that is awarded a critical non-conformity, and any future applications to the programme must include evidence of the policies and/or systems which have been put in place to make sure the Critical Non-Conformity doesn't happen again.

## 5 – The RFPS Modules

The RFPS Standard includes a set of six Clause Groupings, which can be thought of as modules. The first module, "Universal", contains clauses which every RFPS port must meet. The other five modules contain clauses which ports may or may not need to meet, depending on the type of activities that happen at the port.

The RFPS Standard states clearly which module each clause belongs to. This means that once you know which modules are applicable to your port, it should be clear which clauses you need to meet. The CB has the final say about which modules apply to a port, but you can also decide for yourself by using the following table.

Clause Grouping	Characteristics under which Clause Grouping applies
Universal	These clauses apply to all ports.
Internal catch area	This module applies to ports with any sized indoor area where catch is handled or stored. This includes refrigerated storage areas. Characteristics of internal storage areas, such as their size, will be taken into account by the auditor.
Market / sales area	This module applies to ports with a designated selling or auction facility that supplies the UK seafood market. This includes facilities where sales are conducted directly or via auction.
Staff	This module applies to ports that employ any staff to conduct operations at the port. This includes part-time staff members and harbourmasters, full or part time. At a minimum, the clauses in Module 4 will apply to at least one individual at every port. Staff members employed remotely by a central organisation (such as a local council) are not included. Also excluded are contractors or employees of other organisations who work at the port, and whose welfare is covered by a 'Universal' clause.
Vehicles	This module applies to ports that utilise vehicles, including fork lift trucks. It does not include vehicles not utilised in port operations (such as personal transport) or that are owned and operated by personnel who are not employees of the port, with the exception of fork-lifts which are always included. It also excludes vehicles used only to transport catch to and from the port, such as boats or articulated lorries.
Catch handling area	This module applies to ports where catch handling activities occur, such as weighing and grading, but only if they are carried out by port employees.

In all circumstances, the auditor will take into account the scale and nature of activities carried out at the port when they decide whether a clause has been met. The way this affects each individual clause is explained in more detail in Appendix 1, but in general it means that smaller and less complicated ports might not need to produce the same level of detail in their evidence as larger, more complicated ports.

## Responsible Fishing Ports User Guide: Appendix 1 Clause-by-Clause Guidance

This appendix provides guidance for each clause within the RFPS Standard. You are not expected to memorise, or even necessarily read, all of the guidance in this section. It is intended to be used as a reference appendix which you can turn to if the requirements of a specific clause are not obvious, or if you need clarification on a particular point.

## Core Module 1: Food Safety/Structural Integrity

## 1.1 – Port Food Safety Management

1.1.1 The port shall have conducted a HACCP-style assessment which is applicable to the current operations of the port, to ensure that the catch is handled and stored in a safe manner.

As part of a food safety management system to ensure safe food, you **must** have in place a Hazard Analysis and Critical Control Point (HACCP)-style food safety management plan. Details on the nature of HACCP plans and analysis are provided in the RFPS Code of practice (CoP), and also by the UK Government on the <u>Food Standards Agency website</u>.

Your HACCP-style plan should be approved by the local Environmental Health Authority or equivalent organisation.

The HACCP-style assessment is central to the scoring of many clauses in the RFPS Standard, and it is important that it is sufficiently extensive. The purpose of the HACCP-style assessment is to identify hazards throughout the activities conducted on your site, and to identify and implement controls to mitigate the potential risks of these hazards. The auditor will review the assessment and decide whether it covers all the relevant areas, taking into account the scale and nature of activities at the port. At some ports, the HACCP-style assessment might be relatively brief; or your HACCP-style plan may go beyond the base HACCP requirements, depending on the specific circumstances at your port.

In addition to the link provided above, more information on HACCP-style assessments as they apply specifically to fishing ports can be found in the RFPS Code of Practice.

1.1.2 The HACCP-style assessment shall be specific to the premises and be appropriate to the nature, scope and volume of the catch handled.

See the notes under clause 1.1.1. The auditor will be looking for a HACCP-style assessment which you have carried out specifically for your port – but it might be relatively brief depending on the types of activities carried out.

1.1.3 The HACCP-style assessment shall follow HACCP principles and all 7 HACCP requirements, and shall cover all aspects of the port from its operating processes to the personnel that use them.

See the notes under clause 1.1.1. The auditor will be looking to make sure your HACCPstyle assessment follows all seven principles, as follows:

Principle 1: Conduct a hazard analysis.

Principle 2: Determine the critical control points (CCPs).

Principle 3: Establish critical limits.

Principle 4: Establish monitoring procedures.

Principle 5: Establish corrective actions.

Principle 6: Establish verification procedures.

Principle 7: Establish record-keeping and documentation procedures.

As noted elsewhere in this section, it is important to recognise that at some ports the amount of content under each of these headings could be relatively brief.

1.1.4 A documented review of the HACCP-style assessment shall be conducted annually to ensure that it remains fit-for-purpose or if a change has occurred in the operations of the facility or after a complaint, prosecution or change to food safety legislation.

The auditor will request the reports resulting from annual reviews of the HACCP-style process and any material relating to changes implemented. In particular, they will be looking for evidence that you conduct these reviews annually.

If your HACCP-style assessment is relatively brief, your annual review is likely to also be quite quick. The most important thing is to document that a review was conducted – even if it did not result in any changes to the HACCP.

1.1.5 The key aspects of the HACCP-style assessment shall be communicated to all employees and users of the facility by verbal communication, training or through the use of display material in public areas.

In assessing this clause, the auditor will ask how you make sure that everybody who needs to follow the HACCP plan understands what they have to do. You can pass this clause by making people aware verbally, or by covering relevant information during employee training. The auditor won't conduct interviews when assessing this clause, although they may ask your representative how this information is disseminated if it's not clear from your documentation.

## 1.2 – Port External Landing Areas

1.2.1 A risk assessment must be carried out and the findings implemented to ensure that any risks arising from public access to catch-handling or landing areas during operations are mitigated.

The purpose of this clause is to ensure that you have assessed and mitigated potential risks to members of the public posed by port operations. If you can entirely prevent the public from accessing catch-handling or landing areas, you will automatically pass this clause; however, the auditor will recognise that at many ports this is not possible. If you can't stop public access, you will need to be able to show what mechanisms you have in place to mitigate risks. These could include:

- Limited public access, or public access only with a port representative as a guide.
- A designated port representative observing catch-handling or landing activities to ensure the public is kept safe.
- Signage and other 'soft' barriers to interaction between the public and catch-handling activities.

The auditor will want to see evidence that you have conducted a risk assessment and implemented the outcomes, so when you conduct this risk assessment you should make a note of the outcomes and keep them on file.

1.2.2 Catch-landing and handling area shall be free from objectionable odours, smoke, dust and other contaminants (e.g. pesticides), infestation by pests, and not be subject to contamination by flooding.

The auditor will assess this clause by observing the status of the catch landing and handling areas at the time of the audit. To pass this clause, the areas must be free from contamination, and also free from potential sources of contamination. The auditor will recognise that some potential sources of contamination are outside your control (for example, if a neighbour is having a bonfire on the day of the audit), but wherever possible you should be able to show how you respond to potential contaminants.

1.2.3 Catch-landing and handling activities should be carried out to encourage a flowthrough of the catch to minimise risk of cross-contamination and loss of quality from excessive exposure to the elements or air borne contaminants.

The auditor will ask you for an explanation of the process by which catch is moved from vessels (or road transport), into the sales and/or storage areas, and ultimately off the port premises. For activities which are carried out either by port employees or under their oversight, you should make sure that the catch is not exposed to contaminants at any time. The catch may be left exposed to the elements for a short period of time but there should be rules in place to ensure this does not exceed 30 minutes.

The auditor will recognise that at some ports landing activities occur at times when no port staff are present. If this happens at your port, you must be able to demonstrate how you encourage fishers to follow the rules, and also that you ensure there are no barriers to prevent them from doing so.

Contamination by seagulls is of particular concern, and the auditor might ask you what measures you have in place to minimise risk of contamination by them.

1.2.4 Vessel fuelling, maintenance, waste storage or other potentially contaminating activities shall be conducted in a manner, and at a time and place, which minimises the risk of contamination of catch.

The auditor will expect you to have an understanding of the potential risks of contamination at your port, and to have put measures in place to mitigate those risks wherever you can. These measures might include:

- Spatial separation of landing and other activities (e.g. no refuelling or maintenance at the landing quay).
- Temporal separation of landing and other activities (e.g. no refuelling or maintenance while landing is occurring).
- Other measures to ensure that if landing takes place at the same time and location as refuelling, maintenance, or waste management activities, the catch is not contaminated.

You will pass this clause if the auditor believes that the measures you have in place mitigate any risks present under the specific circumstances at your port.

The auditor will recognise that at some ports these types of activities can occur at times when no port staff are present. If this happens at your port, you must be able to demonstrate how you encourage fishers to follow the rules, and also that you ensure there are no barriers to prevent them from doing so.

## **1.3 – Port External Structural Condition**

1.3.1 All catch-landing and handling areas shall be maintained in a hygienic condition and minimise risk of personal injury.

The auditor will score this clause by inspecting the state of the catch-landing and handling areas. You will pass this clause if all of your catch-handling and landing areas look clean and safe.

Auditors are instructed to recognise that the level of hygiene expected of working ports is lower than that demanded in many food-processing facilities, so they will not be expecting sterile conditions. However, they will compare the appearance of the areas to the contents of your cleaning plan, to make sure it is being implemented.

1.3.2 Working area floor surfaces shall be constructed out of a hard wearing, impervious and non-slip material.

The auditor will score this clause by inspecting the catch-handling areas of the port. As this clause is in the "External structural condition" section, the auditor will not consider internal floors when scoring it. You may receive a non-conformity against this clause if you have floors made from wood, brick, or bare ground in working areas, unless you have a

good reason why these floors must remain in place (for example they are in a listed building). If you have these types of flooring in working areas and cannot change them, you should make sure that you have taken steps to reduce the chances anyone will injure themselves or that catch will be contaminated.

1.3.3 Drainage systems in place shall have been approved by the Environmental Health Officer (EHO).

The auditor will ask for documentary evidence that your drainage system has been approved by the EHO – or, if an EHO is present at the time of the audit, the auditor may ask them. You will not be penalised if you can show that you have asked the EHO to review the drainage systems but they have not yet done so.

## 1.4 – Port Internal Structural Condition

1.4.1 Internal selling area(s) shall be fully enclosed, within a structure(s) that provides a protected and hygienic environment.

This clause is in the "Market and Sales Area" grouping. This means that your port will only have to meet it if you operate a market or sales area. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will inspect the market or sales area and make sure it has four walls and a roof. You will not be penalised for having doors which are left open while the market is in operation, but if you do so then you need to include this in your risk assessments (particularly in relation to pest control and temperature management).

1.4.2 The auction/selling area shall be designed logically to prevent cross contamination.

This clause is in the "Market and Sales Area" grouping. This means that your port will only have to meet it if you operate a market or sales area. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will inspect the market or sales area while it is in operation and determine whether activities are being carried out in a way which poses a risk of contamination to the catch. If there are elements of the design of your facilities which mean that cross-contamination is a risk, you should be able to pass this clause if you have put measures in place to mitigate that risk – for example, in your cleaning schedule.

1.4.3 The auction/selling area shall provide sufficient working space and storage capacity to enable all market/selling operations to be carried out effectively to maintain good hygienic and safe working conditions.

This clause is in the "Market and Sales Area" grouping. This means that your port will only have to meet it if you operate a market or sales area. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will inspect the market while it is in operation and make a decision about whether there is enough space for the volume of product and type of activity being carried out. They will also take into account any mitigation measures you have put in place, such as:

- Limits on the amount of fish permitted in the auction area at one time
- Limits on the number of boxes in the auction area
- Any other mechanisms in place to ensure the auction area remains safe and hygienic

1.4.4 The floors shall be in good structural condition to facilitate cleaning and to minimise any potential risk of personal injury.

This clause is in the "Internal Catch Areas" grouping. This means that your port will only have to meet it if your port includes indoor areas where catch is handled or stored. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will score this clause by inspecting the catch-handling areas of the port. The auditor will not consider external floors for this clause. The auditor will inspect the state of the floors at the time of the audit, and will expect them to be clean and in good structural condition. If you have some areas of floor which are not in good structural condition, the auditor will take into account any measures you have put in place to keep the areas clean and safe – such as through your cleaning plan.

1.4.5 Drainage systems shall be maintained to prevent: pooling of water in the sales area; ingress of pests; and the generation of foul odours.

This clause is in the "Internal Catch Areas" grouping. This means that your port will only have to meet it if your port includes indoor areas where catch is handled or stored. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will score this clause by inspecting the state of the internal areas of the port during the on-site assessment. You should pass the clause as long as the auditor does not observe significant pools of water, pests, or foul odours. Small pools of water, especially those which can be explained by recent activity, should not result in a non-conformity.

1.4.6 Walls, including floor/wall junctions and associated pipework, shall be kept clean according to the formal cleaning schedule.

This clause is in the "Internal Catch Areas" grouping. This means that your port will only have to meet it if your port includes indoor areas where catch is handled or stored. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will examine the cleaning schedule to make sure these areas are included, and will also inspect the areas themselves to check whether the cleaning schedule has been applied.

1.4.7 All internal wall surfaces shall be constructed of a smooth, durable, and impervious material.

This clause is in the "Internal Catch Areas" grouping. This means that your port will only have to meet it if your port includes indoor areas where catch is handled or stored. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

This clause applies only to internal walls in the catch-handling and storage areas (including refrigerated areas). Walls in, for example, office areas are not covered by this clause.

Examples of appropriate wall material include plastic or painted concrete, resin coatings, food-grade steel, painted bricks

Examples of inappropriate wall material include wood, unprotected chipboard and composite materials.

1.4.8 A light-coloured finish to all internal walls should be applied to highlight any dirt and debris.

This clause is in the "Internal Catch Areas" grouping. This means that your port will only have to meet it if your port includes indoor areas where catch is handled or stored. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

This clause applies only to internal walls in the catch-handling and storage areas. Walls elsewhere, for example, in office areas are not covered by this clause. The auditor will inspect the internal walls and may raise a non-conformity, if any are observed not to have a light-coloured finish.

1.4.9 Vulnerable doorways, pillars, and corners shall be protected or reinforced against potential physical damage by fork lifts and other traffic.

This clause is in the "Vehicles" grouping. This means that you will only have to meet this clause if vehicles operate at the port. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will score this clause by inspecting the catch-handling and storage areas. They will first decide which areas are 'vulnerable' by considering the types of activity in the area and the extent to which vehicles such as fork lifts are used at the port. The auditor will expect to see protection such as barriers, bollards, or corner protectors in vulnerable areas. If you have conducted a risk assessment and determined areas to be low risk the auditor will also take this into account.

1.4.10 Any pipework in fish-handling areas should be chased into the wall, boxed in, or bracketed sufficiently clear of the walls to enable thorough cleaning.

This clause is in the "Internal Catch Areas" grouping. This means that you will only have to meet this clause if your port includes indoor areas where catch is handled or stored. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will inspect both the design and location of the pipework, and the extent to which it is kept clean.

1.4.11 Any glass present in fish-handling areas (such as windows or lightbulbs) shall be protected to minimise the chances of contamination in the event of breakage.

This clause is in the "Internal Catch Areas" grouping. This means that you will only have to meet this clause if your port includes indoor areas where catch is handled or stored. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will check to make sure that glass in the catch-handling and storage areas is protected. 'Protection' might be physical, or it could be a glass management procedure to be implemented in the case of breakage. In the case that there is exposed glass in the catch handling areas the auditor should ensure that the glass management procedure is extensive and robust.

1.4.12 Window sills must not be used for long-term storage and should be cleaned regularly according to the formal cleaning schedule.

This clause is in the "Internal Catch Areas" grouping. This means that you will only have to meet this clause if your port includes indoor areas where catch is handled or stored. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

Auditors will review the cleaning schedule to make sure windowsills are included, and will also inspect the state of windowsills at the time of the on-site assessment. You should make sure that windowsills used for temporary storage (for example of sales tickets) are cleared at the end of each shift, wherever possible.

1.4.13 All doors enclosing the fish-handling area shall be food-safe and adequate for fire safety and security needs, and must be kept clean and well-maintained according to the formal cleaning schedule.

This clause is in the "Internal Catch Areas" grouping. This means that you will only have to meet this clause if your port includes indoor areas where catch is handled or stored. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

Auditors will review the cleaning schedule to make sure doors are included, and will also inspect the state of doors at the time of the on-site assessment.

1.4.14 Entrances to the loading bay, reception areas and catch storage areas shall be designed to minimise the risk of contamination from those areas.

This clause is in the "Internal Catch Areas" grouping. This means that you will only have to meet this clause if your port includes indoor areas where catch is handled or stored. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will be looking for evidence that you are aware of any risks of contamination and have mitigated them wherever you have identified them. Examples of measures to minimise the risk of contamination include:

- Automatically closing doors
- Signage and policies to require personnel to close doors
- No direct access from reception and office areas to catch-handling areas
- Footbaths and hand washing stations.

1.4.15 All ceilings and roof linings shall be kept well-maintained and cleaned according to the formal cleaning schedule.

This clause is in the "Internal Catch Areas" grouping. This means that you will only have to meet this clause if your port includes indoor areas where catch is handled or stored. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

Auditors will review the cleaning schedule to make sure ceilings are included, and will also inspect the state of ceiling at the time of the on-site assessment.

1.4.16 Lighting in internal fish-handling and storage areas shall be designed and maintained to ensure a safe and hygienic working environment, and to enable inspection of the catch.

This clause is in the "Internal Catch Areas" grouping. This means that you will only have to meet this clause if your port includes indoor areas where catch is handled or stored. For

more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will inspect the level of lighting during the market while it is in operation during the on-site assessment. Prior to the site visit, you should make sure all the bulbs in the market area are working and are bright enough.

1.4.17 All water used in the washing of the catch and equipment cleaning must be potable and free from harmful contaminants and chemicals.

The auditor will be looking for evidence that only potable water is used in the washing of catch and equipment. If your water comes from the public supply, this will be sufficient evidence. Water used on board fishing vessels is not within the scope of the RFPS Standard and the auditor will not check it.

1.4.18 Ice used to maintain catch temperature must be food safe and free from harmful contaminants or additives.

This clause only applies to ice, which is manufactured on-site, or which is provided by the port to port users. Ice which fishers bring from elsewhere is outside the scope of the RFPS Standard, although you may be asked for evidence that ice has originated elsewhere.

If you manufacture or provide ice, you should include it in your HACCP-style risk assessment. If you do not manufacture the ice yourself, you should have an agreement with the manufacturer that the ice is food-safe.

If you do manufacture it yourself, you will be asked to provide evidence of the cleaning and maintenance schedule and other documentation for your ice plant. You should also have a testing regime in place to monitor the ice quality.

1.4.19 All equipment used fish-handling areas shall be fit for purpose, and kept clean according to the formal cleaning plan.

This clause is in the "Internal Catch Areas" grouping. This means that you will only have to meet this clause if your port includes indoor areas where catch is handled or stored. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

Auditors will review the cleaning schedule to make sure equipment is included, and will also inspect the state of equipment at the time of the on-site assessment.

"Equipment" includes, but is not limited to, grading machines, pallets, pallet trucks, hooks, and fish boxes.

1.4.20 All equipment used in fish-handling areas shall be maintained according to a documented maintenance programme.

This clause is in the "Internal Catch Areas" grouping. This means that you will only have to meet this clause if your port includes indoor areas where catch is handled or stored. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

Auditors will review the maintenance schedule to make sure all equipment is included, and will also inspect the state of equipment at the time of the on-site assessment.

1.4.21 There shall be an adequate number of staff toilets, washrooms, changing rooms and break facilities in accordance with Workplace (Health Safety and Welfare) Regulations and Food Safety Legislation.

This clause is in the "Staff" grouping. This means that you will only have to meet this clause if you have one or more employees present at the port. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

You can check the minimum legal requirements for toilets, washbasins and other employee facilities in the <u>HSE guidelines (link downloads a pdf)</u>.

The auditor will consider the number of personnel usually present at the port in total, but will also take into account staff facilities provided by other organisations.

1.4.22 Staff facilities shall be designed, positioned, maintained, and cleaned so as to minimise the contamination risk posed.

This clause is in the "Staff" grouping. This means that you will only have to meet this clause if you have one or more employees present at the port. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will inspect staff facilities during the on-site assessment and check whether they pose a risk of contamination. You should conduct your own risk assessment (although this may be brief and informal) and put in place measures to mitigate any contamination risks you identify.

1.4.23 Additional wash basins shall be located within the work areas associated with direct handling of the catch.

This clause is in the "Internal Catch Areas" grouping. This means that you will only have to meet this clause if your port includes indoor areas where catch is handled or stored. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

Your HACCP-style assessment should include an indication of the number of wash basins which are appropriate. The auditor will be looking to make sure these have been installed.

1.4.24 Hand washing facilities shall be equipped hot and cold water, a suitable handcleaning preparation, and a hygienic means of drying hands.

This clause is in the "Internal Catch Areas" grouping. This means that you will only have to meet this clause if your port includes indoor areas where catch is handled or stored. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will be checking to make sure all your wash basins are equipped hot and cold water, a suitable hand-cleaning preparation (i.e. any food-safe soap), and a hygienic means of drying hands (such as single-use towels and paper towels).

## 1.5 – Port Cleaning Requirements

1.5.1 External areas shall be hosed down using potable water after use, or in accordance with the formal cleaning schedule. Seawater must not be used as a cleaning agent.

Auditors will review the cleaning schedule to make sure external areas are included, and will also inspect the state of external areas at the time of the on-site assessment. The auditor will also look for evidence that potable water is available in external areas. Water taken from the public supply will be considered potable.

1.5.2 Provisions shall be applied for safe access to high level cleaning operations of external gutters, skylights, overhead lighting, canopy ceilings etc. by means of scaffolding or platform lifts or by hiring in services.

This clause is in the "Internal Catch Areas" grouping. This means that you will only have to meet this clause if your port includes indoor areas where catch is handled or stored. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will review your documented high-level cleaning policy and make sure it includes these provisions. If any high-level cleaning occurs during the on-site assessment, the auditor will also check to make sure the policy has been applied.

1.5.3 All surface water guttering and down-pipes shall be cleaned according to the formal cleaning schedule but at least annually.

This clause is in the "Internal Catch Areas" grouping. This means that you will only have to meet this clause if your port includes indoor areas where catch is handled or stored. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

Auditors will review the cleaning schedule to make sure gutters and pipes are included, and will also inspect the state of gutters and pipes at the time of the on-site assessment.

1.5.4 All fish waste storage areas shall be kept clean and tidy by hosing down thoroughly with potable water in accordance with the formal cleaning schedule.

Auditors will review the cleaning schedule to make sure fish waste storage areas are included, and will also inspect the state of waste storage areas at the time of the on-site assessment. Although the clause says areas should be hosed down, this is not necessarily mandatory if your HACCP-style assessment has determined that it is unnecessary.

1.5.5 The floor surfaces of the sales or catch handling/ storage areas shall be cleaned according to the formal cleaning schedule.

This clause is in the "Internal Catch Areas" grouping. This means that you will only have to meet this clause if your port includes indoor areas where catch is handled or stored. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

Auditors will review the cleaning schedule to make sure floors are included, and will also inspect the state of floors at the time of the on-site assessment.

1.5.6 All doors and lower surfaces of walls up to a height of 2 metres within the sales or catch handling/ storage areas shall be cleaned according to the formal cleaning schedule.

This clause is in the "Internal Catch Areas" grouping. This means that you will only have to meet this clause if your port includes indoor areas where catch is handled or stored. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

Auditors will review the cleaning schedule to make sure doors and lower surfaces are included, and will also inspect the state of doors and surfaces at the time of the on-site assessment.

1.5.7 The higher surfaces of walls, ceilings and overhead light fittings shall be cleaned according to the formal cleaning schedule.

This clause is in the "Internal Catch Areas" grouping. This means that you will only have to meet this clause if your port includes indoor areas where catch is handled or stored. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

Auditors will review the cleaning schedule to make sure higher surfaces are included, and will also inspect the state of higher surfaces at the time of the on-site assessment.

1.5.8 All internal drains and gullies shall be cleaned according to the formal cleaning schedule.

This clause is in the "Internal Catch Areas" grouping. This means that you will only have to meet this clause if your port includes indoor areas where catch is handled or stored. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

Auditors will review the cleaning schedule to make sure internal drains and gullies are included, and will also inspect the state of drains and gullies at the time of the on-site assessment.

1.5.9 All staff toilets, urinals and wash-hand basins shall be cleaned according to the formal cleaning schedule.

This clause is in the "Internal Catch Areas" grouping. This means that you will only have to meet this clause if your port includes indoor areas where catch is handled or stored. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

Auditors will review the cleaning schedule to make sure toilets, urinals and wash basins are included, and will also inspect the state of such facilities at the time of the on-site assessment.

1.5.10 Environmental swabbing shall be utilised at a frequency determined by the HACCP-style assessment to ensure the cleaning schedule is effective.

This clause is in the "Internal Catch Areas" grouping. This means that you will only have to meet this clause if your port includes indoor areas where catch is handled or stored. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will expect your HACCP-style assessment to define how frequently swabbing is required. This means that you may not need to conduct any swabbing if the HACCP-style assessment has determined that it is not necessary, but the auditor will ask for solid evidence that this is the case.

If you do conduct swabbing, the auditor will also check to make sure you have a complete set of swabbing records for at least the last three years.

1.5.11 Adverse swab results shall be investigated and appropriate action taken to amend the cleaning schedule or process.

This clause is in the "Internal Catch Areas" grouping. This means that you will only have to meet this clause if your port includes indoor areas where catch is handled or stored. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

If you conduct swabbing, the auditor will expect you to have established a definition for an 'adverse' swab result, which must have been reviewed and approved by the EHO. If you

have recorded any adverse results, the auditor will review the actions you took in response.

1.5.12 A record of remedial actions taken shall be maintained for a period of three years.

This clause is in the "Internal Catch Areas" grouping. This means that you will only have to meet this clause if your port includes indoor areas where catch is handled or stored. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

If you conduct swabbing and have recorded any adverse swab results, the auditor will expect you to maintain a record of the actions taken in response to the result for at least three years.

1.5.13 A cleaning schedule shall be in place for all equipment which comes into contact with the catch.

This clause is in the "Catch Handling Areas" grouping. This means that you will only have to meet this clause if catch is handled or graded by port employees. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

Auditors will review the cleaning schedule to make sure catch-handling equipment is included. The implementation of the schedule is considered under the next clause.

1.5.14 Equipment cleaning schedules must be implemented.

This clause is in the "Catch Handling Areas" grouping. This means that you will only have to meet this clause if catch is handled or graded by port employees. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

Auditors will inspect the state of catch-handling equipment at the time of the on-site assessment, and use this to determine whether the schedule has been implemented.

1.5.15 After cleaning, equipment shall be stored to minimise the risk of exposure to contamination by airborne particulates prior to re-use.

This clause is in the "Catch Handling Areas" grouping. This means that you will only have to meet this clause if catch is handled or graded by port employees. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will inspect the equipment storage areas. If possible, they will check to make sure they equipment is stored correctly once market activity has ended, although

depending on circumstances this may not be possible. They may ask to see a formal policy for the storage of equipment.

1.5.16 All cleaning chemicals shall be approved by the relevant regulatory authority.

Cleaning chemicals used at your port should be approved by an authority such as the EHO. The auditor will ask for a list of the chemicals you use on site and may ask to check the labels of chemical storage containers.

1.5.17 All cleaning equipment and chemicals shall be stored in a dedicated and secure area. Chemicals shall also be labelled, and secured in closed containers.

The auditor will ask to see your chemical storage area(s), and will check to make sure all chemicals are labelled. You will not be penalised for chemicals which are not in the storage area during the on-site assessment if these chemicals are in use.

1.5.18 Cleaning materials and equipment used for cleaning toilets shall be segregated from those used elsewhere.

The auditor will want to see some mechanism in place which makes sure that equipment and chemicals used in toilets is kept separate from those for other uses. You can still store the two types of chemicals and equipment in the same area as long as they can be distinguished.

1.5.19 There must be one or more formal cleaning schedules in place which meet the following requirements:

- The formal cleaning plan(s) must cover all internal and external fish-handling areas and staff facilities.
- The contents of the formal cleaning plan(s) must be based on a risk assessment to ensure they are appropriate and effective.
- The formal cleaning plan(s) must include an indication of the appropriate frequency with which each area should be cleaned.
- The formal cleaning plan(s) must describe the cleaning process to be applied to each area, including chemicals and equipment if required.
- The personnel responsible for organising and carrying out the cleaning schedules shall be defined.
- The cleaning schedules shall ensure the safety of the operative by detailing any protective equipment or special operation requirements (such as for cleaning at heights) revealed by the risk assessment.
- Cleaning methods, including chemical use, shall be risk-assessed to ensure they are appropriate to the task and utilised safely.

The auditor will review your cleaning schedule, most likely during the pre-assessment. In addition to the contents listed in the clause above, the auditor will also check the cleaning

schedule when scoring many of the other clauses – where this is the case, it is noted in the guidance under the individual clause.

The cleaning schedule should match the scale and type of activities carried out at the port. At simple ports where only small quantities of catch are landed, the cleaning schedule might be relatively brief.

1.5.20 Prior to any cleaning operation commencing, other port users shall be warned that cleaning is in progress; for example, by the erection of a sign or the use of Tannoy announcements etc.

The auditor will want to see evidence that you apply a policy like this, or alternatively you could provide evidence that such a policy is not needed.

1.5.21 Cleaning records of all cleaning activity within the facility shall be kept and retained for a period of 3 years.

This clause is in the "Internal Catch Areas" grouping. This means that you will only have to meet this clause if your port includes indoor areas where catch is handled or stored. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will review your cleaning records and expect you to have at least three years' worth. The amount of detail in the records should reflect the types of cleaning activity carried out, and therefore the cleaning schedule. At smaller ports these records could be relatively brief.

1.5.22 All protective cleaning equipment shall be maintained in a good state of repair and replaced whenever necessary.

The auditor will inspect any protective cleaning equipment in use during the on-site assessment, and may also ask to see stores of replacement equipment.

## 1.6 – Personal Hygiene Requirements

1.6.1 All personnel (including visitors and market users) entering catch handling and storage areas shall be required to wear clean, washable protective over-clothing, including coat, hat and boots.

This clause is in the "Internal Catch Areas" grouping. This means that you will only have to meet this clause if your port includes indoor areas where catch is handled or stored. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor may ask to see evidence of a policy, but the main way they assess this clause is likely to be by looking at the personnel in the catch-handling and storage areas during the on-site assessment.

1.6.2 Staff involved in 'wet' operations should wear waterproof aprons, leggings or waterproof trousers/tops and rubber boots.

This clause is in the "Internal Catch Areas" grouping. This means that you will only have to meet this clause if your port includes indoor areas where catch is handled or stored. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor may ask to see evidence of a policy, but the main way they assess this clause is likely to be by looking at the personnel in the catch-handling and storage areas during the on-site assessment.

1.6.3 Staff handling the catch shall be equipped with disposable or hardwearing rubber gloves which are replaced as frequently as required to maintain functionality.

This clause is in the "Internal Catch Areas" grouping. This means that you will only have to meet this clause if your port includes indoor areas where catch is handled or stored. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will assess this clause by observing personnel at work during the on-site assessment. They may ask to see where the supply of replacement gloves is stored.

1.6.4 There shall be a policy in place on eating, drinking, smoking and spitting. Eating, drinking and smoking shall be permitted only in designated areas, and not in catch handling or storage areas. Spitting shall be banned throughout port premises/environs.

The auditor may ask to see evidence of this policy, but will mainly assess this clause by observing personnel during the on-site assessment. The auditor will not penalise you if a member of the public is seen to be breaking rules, such as smoking in a non-smoking area, but they are likely to raise a non-conformity if they see a member of your staff breaking a rule.

1.6.5 All staff and visitors shall be reminded to wash their hands by the provision of signage at strategic locations within the facility.

This clause is in the "Internal Catch Areas" grouping. This means that you will only have to meet this clause if your port includes indoor areas where catch is handled or stored. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

You should make sure you have signs reminding people to wash their hands at key locations in the port – particularly at entrances to fish handling areas and in toilets.

1.6.6 All port staff shall be contractually obliged to adhere to the rules on personal health and personal hygiene.

This clause is in the "Staff" grouping. This means that you will only have to meet this clause if you have one or more employees present at the port. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will ask to see an example of a contract, and will check to make sure rules on health and hygiene are covered.

As with other clauses referring to 'port staff', this clause applies only to personnel you employ directly – it does not apply to other port users.

1.6.7 Visitors shall be informed of requirements relating to their own personal health and on the rules for personal hygiene prior to them being permitted access to the selling area.

This clause is in the "Internal Catch Areas" grouping. This means that you will only have to meet this clause if your port includes indoor areas where catch is handled or stored. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will want to see that you have a mechanism in place to inform visitors of their responsibilities. You should apply this mechanism to the auditor too. The auditor will not accept signage alone as evidence that visitors are informed. Visitors should be informed in person and, wherever possible, should be requested to complete a health and hygiene questionnaire.

1.6.8 Personal hygiene rules shall include a restriction on accessing port facilities if an individual has an infectious disease; a ban on jewellery in catch-handling areas (except a plain band or sleeper earrings); and a ban on excessive fragrance, make-up and nail varnish use.

This clause is in the "Internal Catch Areas" grouping. This means that you will only have to meet this clause if your port includes indoor areas where catch is handled or stored. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will assess this clause by reviewing your hygiene rules. Note that the extent to which these rules are enforced is assessed in other clauses – to pass this clause they just need to be included in your policy.

1.6.9 There shall be a procedure in place to check, on a regular basis, that all staff and visitors are in compliance with the personal hygiene policy. Actions to be taken if the personal hygiene requirements are not being maintained shall be defined.

This clause is in the "Internal Catch Areas" grouping. This means that you will only have to meet this clause if your port includes indoor areas where catch is handled or stored. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will assess this clause by reviewing your hygiene rules. Note that the extent to which these rules are enforced is assessed in other clauses – to pass this clause they just need to be included in your policy.

## 1.7 – Pest Control Requirements

1.7.1 There shall be a documented pest control policy and procedure which is based on risk and meets with the requirements of the port's current HACCP study.

The auditor will review your pest control policy and compare it to the outcomes of your HACCP-style assessment. The details of the policy are considered by other clauses and in general the existence of a pest control policy which is based on the HACCP outcomes will be sufficient to meet this requirement.

The auditor will expect the level of detail in the pest control policy to reflect the scale and type of activities carried out at the port. At smaller ports this policy might be relatively brief.

1.7.2 The pest control plan shall include the following:

- A risk assessment of the fabric of the building and the physical barriers/measures that are in place to protect the catch and to prevent access by pests shall have been conducted.
- The frequency of inspection, monitoring methods, location of pest control bait boxes, substances used, and a system in place for recording the results of inspection or any reported sightings, or evidence of infestation.
- The actions to be taken in the event of infestation.

The auditor will review your pest control plan and make sure it includes all the content listed in the clause.

1.7.3 All personnel working in or entering the catch-handling or storage areas shall be made aware of the importance of good housekeeping, the need to keep doors shut and to spot and report any signs of infestation by the placing of prominent signage and/or induction training.

This clause is in the "Internal Catch Areas" grouping. This means that you will only have to meet this clause if your port includes indoor areas where catch is handled or stored. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will be looking for evidence that you instruct personnel on basic pest prevention measures – this might include your induction training documents. The auditor will not interview personnel but may ask your representative how information is disseminated.

1.7.4 A pest control manual shall need to be maintained; to include, as a minimum, the following;

- The risk assessment process used to design the programme.
- Clearly defined responsibilities for site management and for the contractor.
- Detailed records of pest control inspections and recommendations, and of any pest activity.
- Detailed proof of recommendations being implemented.
- Details of pest control products used and instructions for their use.
- A site plan showing the location of pest control devices.
- Actions to be taken in the event of an infestation.

The auditor will review your pest control manual and make sure it contains all the components listed above. If your pest control is outsourced, the manual may be maintained by another organisation (such as a pest control company), but the auditor will still need to review it.

The auditor will expect the level of detail in the pest control manual to reflect the scale and type of activities carried out at the port. At smaller ports the manual might be relatively brief.

1.7.5 It shall be possible to fully close off fish storage and market areas when not in use to minimise pest access.

This clause is in the "Internal Catch Areas" grouping. This means that you will only have to meet this clause if your port includes indoor areas where catch is handled or stored. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

"Fully closed off" does not require the storage or market areas to be airtight, it just means that the storage and market areas must have doors which can be closed. In particular, make sure all of your doors are operable.

## **1.8 – Food Security Requirements**

1.8.1 There shall be a clearly defined and fully documented food protection (security management) policy statement and plan.

The auditor will review your food protection plan, and will expect it to have been reviewed and approved by the EHO. The details of the plan are considered by other clauses. The auditor will expect the level of detail in the food protection plan to reflect the scale and type of activities carried out at the port. At smaller ports the plan might be relatively brief.

1.8.2 The policy and plan shall be reviewed annually to ensure it remains fit-for-purpose.

The auditor will ask for evidence that the policy and plan have been reviewed. You do not need to have made any changes and the record does not need to be extensive, but you do need to provide records covering the last three years.

The auditor will expect the level of detail recorded in the review documents to reflect the level of detail in the original food protection plan. At smaller ports the review might be relatively brief.

1.8.3 The food protection policy and plan shall include, as a minimum, the following:

- A full risk assessment of the potential threat levels for the facility.
- The steps and measures to be implemented to mitigate any risks identified.

The auditor will review your food protection policy and ensure it contains the two required components.

1.8.4 The steps and measures identified by the food protection policy and plan shall be implemented, to ensure that the potential risks to the catch from the public or other associated risks such as dogs are kept to a minimum.

Your food protection policy should include consideration of risks to food safety which are specific to your port. For example, if the public is able to access the fish handling or storage areas while catch is present, your policy should recognise this risk and attempt to mitigate it. The auditor will take into account the circumstances they observe during the rest of the on-site assessment and make sure the policy matches what they have seen.

1.8.5 Port staff shall be trained in site security procedures according to the requirements identified by the food protection policy and plan, and encouraged to report or challenge unidentified or unknown visitors when it is safe to do so.

This clause is in the "Staff" grouping. This means that you will only have to meet this clause if you have one or more employees present at the port. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will review your training procedures and documents. For the purposes of this clause, 'port staff' includes all personnel working at the port; however only those personnel directly employed by the port need to be given training. Other personnel at the port can be instructed via signage.

1.8.6 All contractors involved in maintenance or repair shall agree to abide by port rules or as directed by port officials.

The auditor will ask to review an example of the documentation provided to contractors prior to their starting work, to make sure it includes such a commitment.

#### 1.9 – Internal Self-Assessment

1.9.1 An internal audit of their food safety operations shall be conducted and documented every 12 months (or after an incident) to ensure that all policies and procedures are still fit for purpose and are being complied with.

The auditor will ask to see the documentation summarising your audit process and recording the outcomes. They will expect to see that you have conducted the review at least once per year.

The auditor will expect the level of detail in the annual review to reflect the scale and type of activities carried out at the port. At smaller ports the review might be relatively brief.

1.9.2 All non-conforming actions that result from this internal audit shall be recorded, with an appropriate member of staff assigned to action and close them out.

The auditor will want to see that you have kept records for a minimum of three years.

# Core Module 2: Port and the Working Environment

#### 2.1 – Due Diligence and Compliance with Legislation

2.1.1 The port shall comply with all legislation relating to legally operating as a port within the UK.

Auditors will not go through all applicable legislation – this clause is primarily a catch-all for if illegality is detected during the assessment of other clauses. However, it should go without saying that if you are found at any point to be breaking the law, you will not be awarded certification to the RFPS Standard.

2.1.2 The port shall provide their annual performance targets as evidence that they operate in full alignment with the good practice guidance published by the Maritime and Coastguard Agency (MCGA).

You can download the <u>MCGA good practice guidance from the UK Government asset</u> <u>publishing service (link downloads a PDF)</u>. The auditor will ask you for evidence of the existence of annual performance targets.

2.1.3 The port shall provide documented evidence that they operate in full alignment with the Port Marine Safety Code (PMSC) which governs the running of ports and harbours.

You can download the <u>PMSC from the UK Government asset publishing service (link</u> downloads a PDF).

You will not be asked to provide evidence that you meet every individual clause of the PMSC. The auditor will focus on determining the extent to which the PMSC has been considered in your port management process; for example, in a formal commitment to adhere to its requirements.

2.1.4 Auction halls and wholesale markets operating on the port shall hold a valid EU Approval Number.

This clause is in the "Market and Sales Area" grouping. This means that your port will only have to meet it if you operate a market or sales area. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will ask to see the EU Approval Number of all auction halls and/or markets at the port.

2.1.5 In the event that the port has been served with an improvement notice, there shall be documented evidence of corrective actions instigated in response.

The auditor will review government records to make sure your port has not been served an improvement notice. If it has, you should make sure you can provide evidence of improvement actions taken in response.

2.1.6 All buyers and sellers operating on their market shall be registered as a fish buyer and/or fisher seller and shall have a designated number with the relevant authority.

This clause is in the "Market and Sales Area" grouping. This means that your port will only have to meet it if you operate a market or sales area. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will ask to see a full list of fish buyers and sellers who operate on the port, along with their designated number. They may also ask whether you have a formal policy to ensure this is the case.

2.1.7 The port shall commit to the implementation of the 'Ports State Measures Agreement' (PSMA) scheme to minimise entry of IUU fish into UK and the sharing of information with the competent authorities (MMO, Marine Scotland).

- **Major Non-Conformity:** The port is not committed to the PSMA. OR The measures the port has put in place to ensure it meets the commitment of the PSMA are inadequate.
- Full Compliance: The port is formally committed to the PSMA.

The auditor will ask to see a formal commitment to the PSMA, either through a document stating this outright or as implied by the measures put in place by the port.

More information on the PSMA is available from the FAO website.

### 2.2 – Improve Skills, Knowledge, and Training Provision

2.2.1 All port employees shall have defined job specifications and responsibilities which they have been made aware of.

This clause is in the "Staff" grouping. This means that you will only have to meet this clause if you have one or more employees present at the port. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will ask to see examples of employee contracts (or other employee-specific documentation where job specifications are detailed).

As with other clauses referring to 'port staff', this clause applies only to personnel you employ directly – it does not apply to other port users.

2.2.2 All port employees, including managers, shall be covered by a training and development programme to ensure that they are equipped with the necessary skills and knowledge to undertake their role correctly and safety.

This clause is in the "Staff" grouping. This means that you will only have to meet this clause if you have one or more employees present at the port. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will ask to see employee training records, and will expect all staff to have received training adequate to their role(s) at the port.

As with other clauses referring to 'port staff', this clause applies only to personnel you employ directly – it does not apply to other port users.

2.2.3 Up-to-date records shall be maintained of all port employees with the level of training each has received.

This clause is in the "Staff" grouping. This means that you will only have to meet this clause if you have one or more employees present at the port. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will ask to see employee training records, and will expect them to cover at least the last three years (unless training is delivered more frequently).

As with other clauses referring to 'port staff', this clause applies only to personnel you employ directly – it does not apply to other port users.

2.2.4 Port employees shall be subject to an employee performance appraisal system to ensure that their performance is evaluated and recorded.

- Major Non-Conformity: There is no employee performance appraisal system in place.
- **Minor Non-Conformity:** There is an employee performance appraisal system in place but it occurs less frequently than annually, or irregularly.
- Full Compliance: There is an annual employee performance appraisal system in place.

This clause is in the "Staff" grouping. This means that you will only have to meet this clause if you have one or more employees present at the port. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will ask to see records of the employee performance appraisal system.

As with other clauses referring to 'port staff', this clause applies only to personnel you employ directly – it does not apply to other port users.

2.2.5 Where specific training is required, especially on dangerous machinery (e.g. fork-lift trucks), port employees shall be suitability trained and monitored.

This clause is in the "Staff" grouping. This means that you will only have to meet this clause if you have one or more employees present at the port. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

When the auditor reviews training records, they will also compare these to job specifications to make sure employees are provided with any specific training required. Dangerous equipment includes the operation of fork-lifts, winches and cranes.

As with other clauses referring to 'port staff', this clause applies only to personnel you employ directly – it does not apply to other port users.

2.2.6 All new and "casual" port employees shall be placed through a full induction training that covers any of the following areas relevant to their role:

- Catch preservation.
- Food safety and personal protective equipment.
- Health and safety and personal protective equipment.
- Personal hygiene requirements.
- Staff welfare and employee rights.

This clause is in the "Staff" grouping. This means that you will only have to meet this clause if you have one or more employees present at the port. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will ask to see the documentation used to induct new members of staff, and will make sure it contains the details listed in the clause (according to its relevance to their role).

As with other clauses referring to 'port staff', this clause applies only to personnel you employ directly – it does not apply to other port users.

2.2.7 Coordination of training activities and record keeping shall be the responsibility of a designated person.

This clause is in the "Staff" grouping. This means that you will only have to meet this clause if you have one or more employees present at the port. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will ask who is responsible for coordinating training activities and maintaining training records – this should be a specific person, although they do not necessarily need to be present at the port.

# 2.3 – Health and Safety of Port Operatives

2.3.1 There shall be a full health and safety strategy and policy in place.

The auditor will ask to see your health and safety strategy and policy documentation. The level of detail in the health and safety strategy and plan should reflect the scale and nature of activities conducted at your port, and at smaller ports the plan might be relatively brief.

2.3.2 A full Health and Safety risk assessment shall have been conducted and implemented to protect all users of the market.

The auditor will ask to see your Health and Safety risk assessment report, including the outcomes and any mitigating measures you have implemented as a result. The auditor will

also check to make sure that the mitigating measures have been implemented during the on-site inspection.

The auditor will expect the level of detail covered by the risk assessment to reflect the scale and type of activities carried out at the port. At smaller ports the assessment might be relatively brief.

2.3.3 A procedure shall be in place for recording any health and safety related incidents and corrective actions.

The auditor will ask to see a record of Health and Safety incidents and corrective actions, and will also ask you explain the procedure by which the record is completed.

# 2.4 – Personal Protective Equipment

2.4.1 Robust, waterproof, non-slip and safety footwear shall be worn by all individuals when in the catch handling or selling areas.

This clause is in the "Internal Catch Areas" grouping. This means that you will only have to meet this clause if your port includes indoor areas where catch is handled or stored. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will assess this clause by observing the footwear worn by personnel in the catch-handling and selling areas during the on-site assessment. You might also be asked to describe your footwear policy.

2.4.2 A fully stocked first-aid kit that is equipped to meet current health and safety legislation shall be readily available to all staff and users of the facility.

- **Major Non-Conformity:** There is an inadequately stocked first aid kit available. OR There is a first aid kit which is not available at some periods during the port's operational hours.
- **Minor Non-Conformity:** There is the majority of a first aid kit available but it is not fully stocked.
- Full Compliance: A fully stocked first aid kit is readily available at all times the port is operational.

This clause is in the "Staff" grouping. This means that you will only have to meet this clause if you have one or more employees present at the port. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will ask to be shown the first aid kit. You will also be expected to know what your legal responsibilities are with regards to first aid provision. The legal requirements for

different sizes of businesses are outlined in <u>HSE First aid at work guidelines (link</u> <u>downloads a PDF)</u>.

2.4.3 The port should ensure that first aid provision, including equipment and personnel, meets the legal requirements appropriate to the size of the operation.

This clause is in the "Staff" grouping. This means that you will only have to meet this clause if you have one or more employees present at the port. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

You will be expected to know what your legal responsibilities are with regards to first aid provision, and the auditor will ask for evidence that they have been met. The legal requirements for different sizes of businesses are outlined in <u>HSE First aid at work</u> guidelines (link downloads a PDF).

2.4.4 Dock areas shall be equipped with life rings and adequate lighting.

The auditor will check lighting and life rings during the on-site assessment. The lighting does not need to be on all the time, but you might be asked to show that it works if the audit happens entirely during daylight hours.

### 2.5 – Vehicle Management (Port Owned)

2.5.1 Where vehicles employed by the port to move fish outdoors have a fully enclosed storage area, this area must be kept clean according to the formal cleaning plan and used only for the transport of food products.

This clause is in the "Vehicles" grouping. This means that you will only have to meet this clause if vehicles operate at the port. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will ask to see your formal cleaning plan for any vehicles owned and operated by the port.

This clause applies only to port-owned vehicles used to transport fish between parts of the port. Vehicles used to transport fish to or from other facilities, such as other ports, markets, or processors, are not covered by this clause.

2.5.2 Where vehicles without enclosed storage areas are used by the port to move fish outdoors, measures must be in place to ensure the catch is not exposed to the elements.

This clause is in the "Vehicles" grouping. This means that you will only have to meet this clause if vehicles operate at the port. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

If you operate vehicles at the port which are covered by this clause, the auditor will ask you to explain what measures are in place to protect the catch.

This clause applies only to port-owned vehicles used to transport fish between parts of the port. Vehicles used to transport fish to or from other facilities, such as other ports, markets, or processors, are not covered by this clause. This clause includes fork lifts.

2.5.3 There shall be procedures in place to ensure that road vehicles are maintained in a road-worthy condition.

This clause is in the "Vehicles" grouping. This means that you will only have to meet this clause if vehicles operate at the port. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

If you operate vehicles at the port which are covered by this clause, the auditor will ask you to explain what measures are in place to ensure these vehicles are maintained in road-worthy condition.

This clause applies only to port-owned vehicles used to transport fish between parts of the port. This clause includes fork lifts. Vehicles used to transport fish to or from other facilities, such as other ports, markets, or processors, are not covered by this clause.

2.5.4 Where legally required, vehicle operators shall be registered with the appropriate authority.

This clause is in the "Vehicles" grouping. This means that you will only have to meet this clause if vehicles operate at the port. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

If you operate vehicles at the port which are covered by this clause, the auditor will ask for evidence that vehicle operators are appropriately registered,

This clause applies only to port-owned vehicles used to transport fish between parts of the port. Vehicles used to transport fish to or from other facilities, such as other ports, markets, or processors, are not covered by this clause. This clause includes fork lifts.

2.5.5 There shall be procedures in place in case of vehicle breakdown or accident.

This clause is in the "Vehicles" grouping. This means that you will only have to meet this clause if vehicles operate at the port. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

If you operate vehicles at the port which are covered by this clause, the auditor will ask you to explain what procedures are in place in case of breakdown or accident. In particular, the auditor will be interested in the procedures applied to prevent contamination or deterioration of the catch.

This clause applies only to vehicles used to transport fish between parts of the port. Vehicles used to transport fish to or from other facilities, such as other ports, markets, or processors, are not covered by this clause. This clause includes fork lifts.

### 2.6 – Welfare of Employees

2.6.1 The port management shall sign and display (clearly) a self-declaration assuring good social practice and human rights of all employees, including a commitment to ensure no discrimination is practised and no harsh or inhumane treatment is allowed.

This clause is in the "Staff" grouping. This means that you will only have to meet this clause if you have one or more employees present at the port. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will ask to see the declaration during the on-site audit. The declaration must be in an area where port employees are able to see it.

Further information is provided in the RFPS Code of Practice.

2.6.2 Port employees shall have been informed about the self-declaration and it shall be revised at least every 3 years, or whenever necessary.

This clause is in the "Staff" grouping. This means that you will only have to meet this clause if you have one or more employees present at the port. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

If the self-declaration is positioned in a place where port employees can see it, the auditor will consider this evidence that employees have been informed.

As with other clauses referring to 'port staff', this clause applies only to personnel you employ directly – it does not apply to other port users.

2.6.3 A designated person shall have been given the knowledge and/or access to national regulations concerning: gross and minimum wages, working hours, union membership, anti-discrimination, child labour, labour contracts, holiday and maternity leave, medical care and pension/gratuity.

This clause is in the "Staff" grouping. This means that you will only have to meet this clause if you have one or more employees present at the port. For more information on

how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will ask for evidence that there is a designated person, for example a job description or operational handbook. The designated person does not need to be present at the port at the time of the on-site assessment, nor will the auditor conduct an interview to test the knowledge of the designated person.

2.6.4 Every port employee shall have a written contract or work agreement in a language that the employee understands fully.

- **Critical Non-Conformity:** Conclusive evidence of any breach of employment legislation.
- **Major Non-Conformity:** One or more port employees do not have a written contract or work agreement in a language they understand.
- **Full Compliance:** All port employees have a written contract or work agreement in a language they understand.

This clause is in the "Staff" grouping. This means that you will only have to meet this clause if you have one or more employees present at the port. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will ask to see a sample of employment contracts, for this and other clauses. Example employment contracts may be provided during the pre-audit stage. The auditor will not carry out interviews with employees.

As with other clauses referring to 'port staff', this clause applies only to personnel you employ directly – it does not apply to other port users.

2.6.5 Records of all employees and subcontractors shall be retained for at least 24 months.

This clause is in the "Staff" grouping. This means that you will only have to meet this clause if you have one or more employees present at the port. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will ask to see examples of employee and subcontractor records. They will expect to see employee records maintained while they are employed and for two years after their employment ends. Subcontractor records should be maintained for two years after the work is completed.

'Records of employees' applies only to personnel you employ directly – it does not apply to other port users. Additionally, only sub-contractors hired by you need to be recorded – sub-contractors hired by other port users are not covered by this clause.

2.6.6 There shall be a documented policy and records to demonstrate that each port employee has been paid for the work they have completed, including any approved overtime.

This clause is in the "Staff" grouping. This means that you will only have to meet this clause if you have one or more employees present at the port. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

Auditors will ask to see the documented policy, plus other payment records such as spreadsheets and payslips. These could be supplied during pre-audit.

As with other clauses referring to 'port employees', this clause applies only to personnel you employ directly – it does not apply to other port users.

2.6.7 If payment is calculated per unit, port employees shall be paid at least the legal minimum wage (on average) within regular working hours.

This clause is in the "Staff" grouping. This means that you will only have to meet this clause if you have one or more employees present at the port. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

Auditors will ask to see employee payment records, such as spreadsheets and payslips. These could be supplied during pre-assessment.

Information on minimum wage can be found on the UK Government website.

As with other clauses referring to 'port employees', this clause applies only to personnel you employ directly – it does not apply to other port users.

2.6.8 No port employee may be below the age of 16.

This clause is in the "Staff" grouping. This means that you will only have to meet this clause if you have one or more employees present at the port. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

Legal restrictions on child employment are described on the UK Government website.

The auditor will ask to see employee records.

As with other clauses referring to 'port employees', this clause applies only to personnel you employ directly – it does not apply to other port users.

2.6.9 Young persons (i.e. between the ages of 16-18) hired part-time shall not engage in work that has been risk assessed by the Health and Safety Risk assessment in clause

2.11 as being dangerous to their health and safety, jeopardizes their development or prevents them from finishing their compulsory school education.

This clause is in the "Staff" grouping. This means that you will only have to meet this clause if you have one or more employees present at the port. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

Legal restrictions on child employment are described on the UK Government website.

If you employ individuals under the age of 18, the auditor will ask to view the risk assessment which has been conducted for each, and the rules which are applied to restrict their role at the port to one which does not violate the requirements of the clause.

As with other clauses referring to 'port staff', this clause applies only to personnel you employ directly – it does not apply to other port users.

2.6.10 Any organisation employing personnel who interact with or work at the port shall be obliged, via their operational contract with the port, to ensure that they implement the minimum levels of worker welfare described in this section.

The "Worker welfare requirements listed in this section" include the requirements at clauses 2.2.1 - 2.2.6, 2.6.4 - 2.6.9, and 2.6.15.

The auditor will not inspect the employment records of non-applicant organisations operating at the port. They will ask to see evidence of the contractual relationship between the port and other organisations, and will expect these contracts to include requirements relating to the elements of worker welfare covered by the other clauses in this section.

Employment arrangements on fishing vessels using the port fall outside the scope of the RFPS programme and therefore they will not be considered during the assessment of this clause.

2.6.11 The port authority shall have a documented policy and records on fair operating practice, which is made available to all their managers and key personnel. As a minimum, this shall cover;

- Bribery
- Corruption
- Coercion
- Inappropriate political lobbying or contributions.

This clause is in the "Staff" grouping. This means that you will only have to meet this clause if you have one or more employees present at the port. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will ask to see your documented fair operating practice policy, which should contain the components listed in the clause.

2.6.12 Any port employees who are agency workers operating within the facility shall trigger additional risk assessment and due diligence enquiries when these workers are present.

This clause is in the "Staff" grouping. This means that you will only have to meet this clause if you have one or more employees present at the port. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will ask to review your policy relating to additional risk assessments conducted for agency workers, and the results of any risk assessments which have been conducted.

This clause applies only to agency workers who you employ directly – it does not apply to agency workers employed by other port users.

2.6.13 The port shall have a documented grievance procedure, which details the time frame within which grievances will be resolved and ensures grievances and their resolutions are documented and retained for at least 2 years.

This clause is in the "Staff" grouping. This means that you will only have to meet this clause if you have one or more employees present at the port. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will ask to see your grievance procedure along with any records of grievances reported and resolutions to those grievances. You should maintain records of grievances for at least 2 years, but of course if none have been reported then this record may be empty.

2.6.14 The port shall create and implement a policy detailing the response to serious or grievous concerns to worker welfare.

This clause is in the "Staff" grouping. This means that you will only have to meet this clause if you have one or more employees present at the port. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will ask to see your worker welfare policy.

2.6.15 All port employees shall have chosen employment freely, with no forced, bonded or involuntary labour.

This clause is in the "Staff" grouping. This means that you will only have to meet this clause if you have one or more employees present at the port. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will assess this clause by reviewing employee contracts and other records.

As with other clauses referring to 'port employees', this clause applies only to personnel you employ directly – it does not apply to other port users.

### 2.7 – Internal Self-Assessment

2.7.1 The port authority shall conduct and document an internal audit of their health and safety requirements every 3 years, and conduct an internal audit of the relevant section of their health and safety requirements after an incident, to ensure that all policies and procedures remain fit for purpose and are being complied with.

Auditors will ask to see documentation summarising the audit process and recording the outcomes. You will be expected to provide information on the process and outcomes of the most recent internal audit, which must have occurred within the last three years.

The auditor will expect the level of detail covered by the internal audit to reflect the scale and type of activities carried out at the port. At smaller ports the audit might be relatively brief.

2.7.2 All non-conforming actions that result from this internal audit shall be recorded, with an appropriate member of staff assigned to action and close them out.

When the auditor reviews your internal audit documentation, they will expect to see a record of any non-conformances and actions taken in response. You should maintain these records for at least three years.

# Core Module 3: Care of Environment

#### 3.1 - Waste management and waste disposal

3.1.1 A risk assessment shall have been conducted and documented that identifies relevant environmental issues and the provisions made to address the associated risks.

The auditor will ask to see documentation detailing the environmental risk assessment. The risk assessment should cover, as a minimum:

• Waste management:, including fishing gear waste and liquid waste, fish waste, food waste, fishing vessel waste.

- Emissions: diesel fuel and oil, steam.
- Noise pollution: box washers, refrigeration equipment, machinery, vehicles.

The auditor will expect the level of detail covered by the risk assessment to reflect the scale and type of activities carried out at the port. At smaller ports the assessment might be relatively brief.

3.1.2 The port shall operate under a Waste Management Plan (WMP) which meets the requirements of the relevant authority.

Your WMP should be approved by the Maritime and Coastguard Agency (MCA) or an equivalent authority. The auditor will ask to see the waste management plan documentation.

The auditor will expect the level of detail in the WMP to reflect the scale and type of activities carried out at the port. At smaller ports the WMP might be relatively brief.

3.1.3 Records shall be maintained of any non-compliance to the WMP, alongside processes to action in future plans and address these areas of non-compliance.

The auditor will ask to see the records of any WMP non-compliances. You should maintain these records for at least two years.

3.1.4 All waste (food and non-food) shall be categorised and separated according to legislation and the requirements of the waste collection organisation(s).

The auditor will inspect your waste categorisation & storage facilities during the on-site assessment, and check whether it is categorised according to legislation. You may be asked to describe the requirements of your waste collection organisation.

The auditor will recognise that at some ports waste disposal activities can occur at times when no port staff are present. If this happens at your port, you must be able to demonstrate how you encourage fishers to follow the rules, and also that you ensure there are no barriers to prevent them from doing so.

3.1.5 Only waste carriers licensed by the UK Environmental agency (or equivalent organisation) shall be used for the removal of waste material.

The auditor will ask for information about the waste carrier(s) who remove waste material from the port, including evidence that they are licensed by the EA (or equivalent).

The auditor may ask to see evidence of 'waste transfer notes' as specified by relevant authorities for example EA, SEPA, and DAERA in Northern Ireland.

3.1.6 There shall be a policy of recycling non-food waste wherever possible.

Your recycling policy does not necessarily need to be documented – the auditor will look for evidence that recycling occurs in practice.

3.1.7 Covered receptacle(s) shall be provided for the disposal of solid waste materials.

During the on-site assessment, the auditor will ask to see the covered receptacles you provide for solid waste.

3.1.8 All port-generated waste waters, including those generated from cleaning operations where cleaning chemicals are used, ice melt-water, live shellfish (vivier) transport and staff facilities, shall be discharged to a public sewer or disposed of by other approved means.

The auditor will check to make sure that drainage systems lead into the public sewer or other approved disposal system.

3.1.9 There shall be a process in place to store and dispose of liquid material (e.g. engine oil) that cannot be discarded into the public sewage, and to ensure it does not pose a risk of contamination to the catch.

Auditors will ask you to explain the process in place for the disposal of liquids, and any mechanisms you use (including sanctions) to prevent disposal of liquids such as engine oil into the harbour or public sewer.

Liquids covered by this clause include engine oil, antifreeze, concentrated cleaning chemicals, and fuel.

# 3.2 - Carbon Footprint requirements

3.2.1 Energy consumption at the port shall be reviewed on an annual basis.

The auditor will ask to see your energy consumption review documentation. As a minimum, this documentation should include the total energy usage, a comparison of this usage with previous years, and the date of the review. You should be able to demonstrate that you conduct the review every year.

### 3.3 - Local Community Engagement

3.3.1 There shall be a proactive policy in place to engage and evaluate the potential impacts of operations on the local community.

The auditor will ask you to explain the ways in which you engage with the local community and evaluate the potential impacts of the port. This does not need to be a substantial document and could be a relatively informal process, especially at smaller ports.

### 3.4 – Environmental Emissions

3.4.1 The port shall have in place a policy and records of permits for environmental emissions regulations as stated in current legislation to cover the following:

- Emissions to air tolerances,
- Discharge into the sewage systems,
- Release of toxic or hazardous substances,
- Noise, smell and dust pollution,
- Ground pollution.

The auditor will ask to review the policies and permits you have in relation to the listed emissions. The auditor will recognise that at many ports, particularly smaller ports, most or all of the listed permits may not be required.

# Core Module 4: Care of the catch - Fish as Food

#### 4.1 – Catch Handing Requirements

4.1.1 Training and supervisory initiatives to ensure that the catch is treated as food by all staff, to minimise the risk of the catch being crushed, stood upon, dropped, thrown or otherwise roughly handled.

This clause is in the "Staff" grouping. This means that you will only have to meet this clause if you have one or more employees present at the port. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will ask to see details of the training and/or supervisory initiatives which you have in place in relation to catch handling. They will also observe the way that catch is handled during the component of the on-site assessment which takes place while the market is operational. They may raise a non-conformity if they see personnel throwing, dropping, or stepping on the catch, or otherwise handling it roughly.

4.1.2 All catch-handling equipment shall be operated to minimise the risk of physical damage to the catch.

The auditor will observe the way catch-handling equipment is used during the component of the on-site assessment which takes place while the market is operational. They may raise a non-conformity if they see equipment being used in a way which could damage the catch.

4.1.3 The level of ice and catch shall not exceed the rim of each box, to prevent catch from being crushed when boxes are stacked.

The auditor will observe the amount of ice used in each box during the component of the on-site assessment which takes place while the market is operational. They may raise a non-conformity if they see boxes being overfilled.

4.1.4 A maximum stacking height shall be enforced and based on a risk assessment of the specific circumstances at the port.

This clause is in the "Internal Catch Areas" grouping. This means that you will only have to meet this clause if your port includes indoor areas where catch is handled or stored. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will ask you what the maximum stack height is, and how you arrived at that value.

The auditor will observe stacking heights during the component of the on-site assessment which takes place while the market is operational. They may raise a non-conformity if they see stack heights which exceed the established maximum.

### 4.2 – Hygienic handling and use of facilities

4.2.1 A risk assessment shall have been conducted and implemented to ensure the catch is not exposed to risks of contamination at any point while on port premises.

The auditor will ask to see your contamination risk assessment documentation, which may be incorporated into the HACCP-style assessment. They will expect the assessment to cover the catch at all stages of its journey through the port, although it does not need to cover activities on board fishing vessels or in the vehicles which transport catch to or from the port.

The auditor will also ask for evidence that any mitigation measures identified as necessary by the assessment have been implemented.

The auditor will expect the level of detail covered by the risk assessment to reflect the scale and type of activities carried out at the port. At smaller ports the assessment might be relatively brief.

4.2.2 Any catch that is held in areas exposed to the elements shall be kept covered.

The auditor will consider the catch-handling procedures and any policy in place to ensure that catch is not left exposed to the elements for more than 5 minutes at any stage in the catch-handling process. They will also observe the way catch is handled during the component of the on-site assessment which takes place while the market is operational. They may raise a non-conformity if they see catch left exposed to the elements for longer than 5 minutes.

4.2.3 Prior to any work-break, any catch remaining on the quay, conveyor belts or grading tables etc. shall be cleared.

This clause is in the "Catch Handling Areas" grouping. This means that you will only have to meet this clause if catch is handled or graded by port employees. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

Auditors will ask for details of your policy and an explanation of how it is enforced. The main objective of the policy should be to ensure that catch is not exposed to contaminants or inappropriate temperatures.

4.2.4 Fish must not be allowed to make direct contact with the market floor.

This clause is in the "Internal Catch Areas" grouping. This means that you will only have to meet this clause if your port includes indoor areas where catch is handled or stored. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

Auditors will ask for details of the policy for fish that accidentally makes direct contact with the market floor. If the auditor observes fish making contact with the market floor during the on-site assessment, and it is not subsequently treated as animal by-product, they may raise a non-conformity.

4.2.5 A risk assessment shall have been conducted and implemented to ensure that other port users and operations do not pose a risk of contamination to catch being landed.

The auditor will ask to see details of this risk assessment, which may form part of the risk assessment conducted in relation to clause 4.2.1, or the HACCP-style assessment. The risk assessment should include consideration of the actions of fishers and transport personnel where these occur on port premises, but auditors will consider the extent to which you are able to control the actions of fishers and transport personnel when determining whether the results of the assessment are implemented.

4.2.6 Where mechanised equipment is used to unload, handle, grade and weigh etc. the catch, there shall be procedures in place to ensure that the manufacturer's instructions are complied with.

The auditor will ask you to explain the policy which ensures equipment is used according to the manufacturer's instructions. They will also look for evidence of whether the policy is applied in practice when they are inspecting your facilities.

4.2.7 Operators of mechanised equipment shall be trained in its correct use, and records of this training shall be retained.

This clause is in the "Market and Sales Area" grouping. This means that your port will only have to meet it if you operate a market or sales area. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will ask for evidence that relevant personnel have received training. You should maintain records of this training for at least two years, or longer if the training is delivered less frequently.

4.2.8 With the exception of disposable one-use containers, distribution boxes and pallets intended for transporting/displaying the catch shall be constructed of an impervious material and be of good structural condition.

This clause is in the "Market and Sales Area" grouping. This means that your port will only have to meet it if you operate a market or sales area. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will observe the fish boxes used during the component of the on-site assessment which takes place while the market is operational. They may raise a nonconformity if they see boxes in use which are in poor condition, or evidence that disposable boxes are re-used.

4.2.9 All distribution boxes/containers and pallets shall be cleaned after use.

This clause is in the "Market and Sales Area" grouping. This means that your port will only have to meet it if you operate a market or sales area. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will ask for evidence that boxes and containers are washed at least once per use cycle. You should have a policy in place to ensure this occurs, but it does not need to be documented if there is evidence that it is applied.

4.2.10 The cleanliness of boxes shall be ensured by the implementation of periodic bacterial swab sampling.

This clause relates to the swabbing requirements in 1.5.10 & 1.5.11, and therefore may not be necessary if there is good reason described in the HACCP-style assessment. However, in most cases swabbing of fish boxes should occur, and if so swabbing of fish boxes should be carried out at least annually.

Fish box swabbing will be subjected to the same requirements as swabbing in other areas – for example, there should be an established definition for 'adverse' results, and records of these should be maintained for at least three years.

# 4.3 – Size and quality grading (marketing standards)

4.3.1 All size grading of the catch that occurs at the port shall be executed consistently and meet with the port's specifications.

This clause is in the "Catch Handling Areas" grouping. This means that you will only have to meet this clause if catch is handled or graded by port employees. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

Auditors will ask to see your size grading specifications and the mechanism by which they are implemented. The auditor will not measure sample fish to ensure the mechanism is effective, and any grading which occurs on board vessels is outside the scope of this clause.

4.3.2 The size grading specifications of the port shall be made publically available.

This clause is in the "Catch Handling Areas" grouping. This means that you will only have to meet this clause if catch is handled or graded by port employees. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will ask you to show them where your grading specifications are listed. You may receive a non-conformity if these specifications are only available on request, or are only published at the port itself.

4.3.3 All 'lots' of catch products shall be labelled on the market at the point of sale to meet with current legislation.

This clause is in the "Market and Sales Area" grouping. This means that your port will only have to meet it if you operate a market or sales area. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

Auditors will ask you to explain the process by which catch is labelled, but will also check the labelling in the market hall during the on-site assessment.

The auditor will expect each lot to be labelled as follows:

- The size category **must** be clearly and indelibly marked in characters which are at least 5 cm high on labels affixed to each lot.
- The freshness category **must** be clearly and indelibly marked in characters which are at least 5 cm high on labels affixed to each lot.

### 4.4 – Quality Grades

4.4.1 There shall be a procedure in place to check and monitor the catch quality to ensure all fish placed on the market is of merchantable quality.

This clause is in the "Market and Sales Area" grouping. This means that your port will only have to meet it if you operate a market or sales area. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will ask you to describe the process by which catch quality is monitored. Fish that is not of merchantable quality should be withdrawn from sale and sent for disposal as animal by product, using a process which meets the requirements of clauses 4.7.3 - 4.7.6.

The auditor will not check individual boxes of fish specifically to ensure the policy is effective, although they may ask you for an explanation if fish appearing to be of low quality is observed in the market area.

# 4.5 – Weighing (fisheries control)

4.5.1 Catch weighing at the port shall be carried out following a procedure that is compliant with the RFPS CoP, including the maintenance of weighing records for a minimum of 3 years.

This clause is in the "Catch Handling Areas" grouping. This means that you will only have to meet this clause if catch is handled or graded by port employees. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

You can refer to the RFPS Code of Practice (section 4.4) for details on the required weighing procedures. All fish must be weighed using an approved and certified weighing system on landing before fish are sold or transported for sale or storage. The auditor will check the certification of weighing equipment, and may ask for evidence of compliance records for the last three years.

4.5.2 All catch weights shall be accessible by the time of first sale.

This clause is in the "Market and Sales Area" grouping. This means that your port will only have to meet it if you operate a market or sales area. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will ask you how catch weights are provided. It is acceptable for catch weights to be provided verbally to buyers.

4.5.3 All records of any calibration tests of weighing equipment shall be retained along with actions taken when adverse readings are recorded.

This clause is in the "Catch Handling Areas" grouping. This means that you will only have to meet this clause if catch is handled or graded by port employees. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will ask to see your records of weighing tests and corrective actions for the last three years.

### 4.6 – Temperature control (food safety)

4.6.1 The HACCP-style plan for the port shall include temperature considerations to ensure that from the point of landing to the point of removal from the port, the catch is maintained close to zero degrees centigrade / at a temperature approaching that of melting ice (0oC to +4oC), or at the appropriate temperature in the case of live catch.

The auditor will check to make sure your HACCP-style assessment includes consideration of the temperature of the catch at all stages of its journey through the port. The auditor will accept any mechanism which keeps the catch at an appropriate temperature, including mechanical refrigeration and ice.

You should also make sure that the plan meets the requirements of clause 4.6.3, and the other clauses in this section.

Catch temperatures on board vessels or in vehicles transporting the catch to or from the port are outside the scope of this clause and the auditor will not ask anything in relation to them.

4.6.2 Where used, mechanical refrigeration shall have the capability of achieving an operating temperature approaching that of melting ice (0oC to +4oC).

This clause is in the "Internal Catch Areas" grouping. This means that you will only have to meet this clause if your port includes indoor areas where catch is handled or stored. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will ask for evidence that any mechanical refrigeration used at the port is able to keep the catch between 0 and 4°C. You may receive a non-conformity if your refrigeration equipment is broken during the on-site assessment.

4.6.3 During any break in the grading/handling process, the catch shall be stored at suitably chilled temperatures.

This clause is in the "Internal Catch Areas" grouping. This means that you will only have to meet this clause if your port includes indoor areas where catch is handled or stored. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will make sure that the plan identified in clause 4.6.1 is applied to catch, specifically at breaks in the handling process, to ensure the catch is not exposed to excessive temperatures.

4.6.4 There shall be a procedure in place to ensure the catch temperatures described in 4.6.1 are maintained.

This clause is in the "Internal Catch Areas" grouping. This means that you will only have to meet this clause if your port includes indoor areas where catch is handled or stored. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will ask you to describe the procedure, which may involve periodic temperature checks of catch and mechanical refrigeration, either manually or via an automated system. The auditor will also ask you for any temperature check records, or service contracts for refrigeration maintenance.

4.6.5 A record of these temperature checks shall be maintained along with any actions taken when adverse readings were observed.

This clause is in the "Internal Catch Areas" grouping. This means that you will only have to meet this clause if your port includes indoor areas where catch is handled or stored. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

Auditors will ask to see your temperature check records, which must cover at least the last year.

Temperature check records should, as a minimum, include checks on the temperature of the catch itself, but can also include mechanical refrigeration checks.

### 4.7 – Undersized fish (landing obligation)

4.7.1 To comply with the EU landing obligation, there shall be policies and procedures in place to ensure the following:

This clause is in the "Internal Catch Areas" grouping. This means that you will only have to meet this clause if your port includes indoor areas where catch is handled or stored. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

This is not a clause per se, and will not be assessed.

4.7.2 There shall be policies and procedures in place to ensure that no undersized fish are used for direct human consumption.

This clause is in the "Internal Catch Areas" grouping. This means that you will only have to meet this clause if your port includes indoor areas where catch is handled or stored. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will ask you explain the procedures you apply to identify and deal with undersized fish. Wherever relevant they will also check to make sure the policy is applied while they observe the market in operation.

4.7.3 There shall be policies and procedures in place to ensure that undersized fish intended for non-direct human consumption markets shall be handled/stored/transported according to ABP rules.

This clause is in the "Internal Catch Areas" grouping. This means that you will only have to meet this clause if your port includes indoor areas where catch is handled or stored. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will ask you for an explanation of the procedures you apply to identify and deal with undersized fish, including those related to bait.

4.7.4 There shall be policies and procedures in place to ensure that facilities that are Animal By-Product (ABP) approved are also registered with the relevant animal health agency.

This clause is in the "Internal Catch Areas" grouping. This means that you will only have to meet this clause if your port includes indoor areas where catch is handled or stored. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will check government records to make sure that any of your facilities which are ABP-approved are also registered with the Animal and Plant Health Agency (APHA).

4.7.5 There shall be policies and procedures in place to ensure that ABP storage and handling facilities, including those used to store and handle bait, have sufficient separation between ABP fish and fish for human consumption during handling, storage and transportation.

This clause is in the "Internal Catch Areas" grouping. This means that you will only have to meet this clause if your port includes indoor areas where catch is handled or stored. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will assess this clause when they review your ABP policies and procedures.

4.7.6 There shall be policies and procedures in place to ensure that container(s) used to store ABP fish, including bait, shall be leak-proof and labelled as 'CATEGORY 3: not for human consumption'.

This clause is in the "Internal Catch Areas" grouping. This means that you will only have to meet this clause if your port includes indoor areas where catch is handled or stored. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will assess this clause when they review your ABP policies and procedures, and will also look to make sure you have such containers available.

### 4.8 – Toxins Harmful to Human Health

4.8.1 The following families of fish must be specifically excluded from being placed onto the market: *Tetraodontidae* (pufferfish); *Molidae* (sunfish); *Diodontdae* (porcupinefish) and *Canthigasteridae* (toby / sharpnose puffer).

This clause is in the "Market and Sales Area" grouping. This means that your port will only have to meet it if you operate a market or sales area. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will ask you whether these families are explicitly excluded from sale on your market.

4.8.2 Food Business Operators (FBOs) who operate auction markets shall have policies and procedures that address the sale of bivalve molluscs which may or may not contain biotoxins above regulatory limits for biotoxins. Consideration should be given to known testing results as published on the Cefas website and shared industry results.

This clause is in the "Market and Sales Area" grouping. This means that your port will only have to meet it if you operate a market or sales area. For more information on how to

decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will ask you to explain your policies and procedures in relation to bivalve biotoxins.

### 4.9 – Continuous Improvement

4.9.1 Any enquiries, complaints and any incidents associated with the port's activities, practices, and seafood products that are landed must be recorded, along with any action taken in response.

The auditor will ask to see your records of enquiries, complaints and incidents. You should maintain these records for at least three years. If you have not received any enquiries or complaints these records might be empty.

# Core Module 5: Traceability

#### 5.1 – Traceability

5.1.1 There shall be processes in place that enable the traceability of a catch to its originating vessel.

The auditor will ask you to explain how traceability records are maintained at your port. The aim of this clause is to ensure that identification of catch back to the vessel or group of vessels is possible. Where catch from multiple vessels is aggregated, a record of the group of vessels from which the catch originated is adequate.

This clause applies to catch landed at your port. Where catch arrives at your port from other locations, traceability back to the vessel may have been lost prior to arrival; however where traceability back the vessel is provided at the point of arrival at your port, it should be maintained throughout the port handling process.

Some traceability processes may not be applied by you directly; however, traceability processes applied by organisations that are not formally part of the applicant group are acceptable as evidence that this clause is met.

Auditors will also check whether traceability processes include a mechanism by which accuracy of catch information is ensured; for example, by spot checks or CCTV.

5.1.2 Those organisations responsible for the sale of fish on the fish-market shall provide catch information no later than the point of "first sale", including fish imported from non-EU countries.

This clause is in the "Market and Sales Area" grouping. This means that your port will only have to meet it if you operate a market or sales area. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will ask you to explain how and when catch information is provided to buyers. Information can be provided verbally.

5.1.3 Fish at the port shall be subject to a traceability process that is documented and has the ability to trace the catch through all stages of handling, processing, and distribution while within the facility.

The auditor will investigate whether the traceability process covers all stages of the catchhandling process, from the point of arrival at your port (either at landing or unloading) to the point where it is loaded into the transport which will remove it from your port.

The auditor will ask to see the documented traceability procedure which ensures that catch is traceable throughout your port's handling process. Note that you may receive a non-conformity if your procedure is not documented.

5.1.4 Records shall be kept of who has put fish onto the market and to whom it was subsequently supplied.

This clause is in the "Market and Sales Area" grouping. This means that your port will only have to meet it if you operate a market or sales area. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor will ask to see sales records and will conduct a basic review to see whether they are comprehensive.

5.1.5 There shall be a documented procedure to identify a particular catch, lot or batch, its product description, quantity and date of dispatch.

The auditor will ask to review your documented procedure. This procedure might include physical presentation of information (for example labelling) and verbal communication of information.

5.1.6 All records used to determine the traceability of the catch shall be maintained for a period of 3 years or more.

'Traceability records' includes the information described in clauses 5.1.2, 5.1.4 and 5.1.5. The auditor will ask for evidence that the records are kept for at least three years. You might not maintain these records yourself – evidence that another organisation or organisations at the port maintain them is sufficient.

# 5.2 – Registration of Buyers and Sellers

5.2.1 All registered buyers or sellers of fish shall complete and submit to Fisheries Departments a sales note for each transaction.

This clause is in the "Market and Sales Area" grouping. This means that your port will only have to meet it if you operate a market or sales area. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

If your port sells fish itself, the auditor will ask to see examples of sales notes you submit to fishery departments.

If a Fish Agent (seller) who is part of the applicant group sells the fish, the auditor will either request the fish agent(s) to provide examples of sales notes, or ask to see the 'contractual agreement' between the port and fish agent, which will stipulate that the fish agent agrees to abide by all legislation which includes the 'buyers and sellers' legislation.

Where fish agents are not part of the applicant group, you must arrange for evidence of the submission of sales notes to be available at the time of the audit.

# 5.3 – Catch information requirements

5.3.1 All catches shall be put into 'lots' before first sale, based upon species and size for each fishing vessel, or group of fishing vessels.

This clause is in the "Market and Sales Area" grouping. This means that your port will only have to meet it if you operate a market or sales area. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

The auditor may ask you to explain the process by which catches are places into lots, but will primarily assess this clause by observing the operation of the market during the onsite assessment.

# 5.4 – Information required for each lot of fish or shellfish (prior to first sale)

5.4.1 The following information shall be available prior to first sale for catch landed at the port:

- Reference to 'lot' or 'batch' through information describing vessel, species, date and geographical catching area.
- Name and address of supplier.
- Name of fishing vessel and port identification number (PLNs).

- Date of catch or trip; this can include several calendar days or a single period of time corresponding to several dates of catches.
- Box weight or number of individual fish or shellfish.
- Predominant FAO sub area or division where caught.
- Category of fishing gear used.
- Commercial designation and scientific name of species caught.
- FAO alpha-3 species code.

This clause is in the "Market and Sales Area" grouping. This means that your port will only have to meet it if you operate a market or sales area. For more information on how to decide which clauses are applicable to your port, please refer to the main part of the RFPS User Guide.

This clause applies only to fish landed at your port. The auditor will check to make sure this information is recorded, but the specific way in which it should be recorded is not defined by the RFPS Standard.

Further information on traceability can be found on the <u>Seafish website</u> or <u>UK Government</u> <u>website</u>, or by contacting the local Fisheries Office.

#### 5.5 – Catches sourced from a third country

5.5.1 The following information shall be available for third country imports of fisheries products:

- FAO catch area.
- Category of fishing gear used.
- Commercial designation and scientific name.

The auditor will check to make sure this information is recorded at ports where catch from third countries is imported. In particular, note that species name and catch areas are legal requirements.

5.5.2 The catch certificate for all marine caught fish shall be available on entry for fish imported into the EU from non-EU countries.

This clause applies only to catch which is imported at the port under assessment. Catch imported at another location and moved through the UK to the port under assessment is not covered by this clause.

The auditor will ask for evidence that catch certificates are available, such as example certificates or confirmation from the Port Health Authority stating due process is followed for imports into your port.

### 5.6 – Food authenticity – Third Party Chain of Custody Requirements

5.6.1 There shall be specific procedures in place to verify that certified seafood is handled in the appropriate way in order to provide reassurance to the supply chain.

The auditor will ask you to describe the procedures in place for certified products (such as MSC fish). A Chain of Custody certification for the relevant standard will be considered adequate evidence that procedures are in place.