

## **Proposed changes to the main body of the Certification and Accreditation Requirements (CAR v.2)**

**ADD the following to 17.1 Unit of Certification (after the proposed section on multi-site):**

17.1.4 A group in which each member operates either a single site or more than one site.

17.1.4.1 For a group to qualify as a unit of certification it shall conform to the ***“ASC Requirements for the Certification of Producer Groups”***.

17.1.4.2 Audits of groups shall conform to Annex F.

## **Annex F – Requirements for CABs Providing Certification Services for Producer Groups**

### **F1. Scope**

F1.1. This document contains the requirements to apply for, obtain and maintain certification for a group under the control of a Group Management Body. Responsibilities for the Group Management, individual members and CABs are identified.

### **F2. Normative Documents**

F2.1. The requirements of this Annex are additional to those in the *ASC Farm Certification and Accreditation Requirements*, and in the application of this Annex CABs shall conform to the requirements of the following:

F2.1.1. ISO 17021: 2015, General Requirements for Bodies Operating Assessment and Certification/Registration of Quality Systems

F2.2. ASC Requirements for the Certification of Producer Groups (Group Certification).

### **F3. Requirements for CABs**

F3.1. Third-party audits and certification of the Group shall be undertaken by accredited CABs with scope for group certification.

F3.2. CAB audit team members shall conform to the requirements of Annex B

F3.3. A Document Review shall be completed prior to the Initial Audit and whenever major changes occur in the Group's structure and / or documented management system.

F3.4. All non-conformities raised by the CAB shall be raised against the Group Management Body.

F3.4.1. In addition to the Group Management Body, the CAB may raise a non-conformity against a Group Member or a site.

## **F4. Risk Weighted Sampling Procedure**

F4.1. The CAB procedures shall describe its risk-weighted sampling procedure for the audit of Group Management Bodies that will conform to Annex F. This procedure shall include:

F4.1.1. Audit planning procedures including:

F4.1.1.1. Initial audits

F4.1.1.2. Surveillance audits

F4.1.1.3. Re-certification audits

F4.1.2. Risk assessment procedures including:

F4.1.2.1. Threat identification

F4.1.2.2. Risk assessment

F4.1.2.3. Assignment of risk categories

F4.1.3. Sample selection procedures including:

F4.1.3.1. Sample size

F4.1.3.2. Sample selection

F4.1.4. Reporting procedures:

F4.1.4.1. Reporting on audit planning, risk assessment and sample selection

F4.2. Audit Planning

F4.2.1. Planning for Group Management Body audits shall be undertaken based on the results of the risk-weighted sampling process described below.

F4.3. Risk Assessment

F4.3.1. Risk weighted sampling shall be used in audit planning for all audits of Group Management Bodies.

F4.3.2. Threat identification and risk classification

F4.3.2.1. Threat Identification

- F4.3.2.1.1. The CAB shall review the threats listed in Table F2 and identify all those that are relevant to the operation of the client.
- A. For each threat in Table F2 that is determined not to be relevant, the CAB shall document its rationale and include it in the audit report.
- F4.3.2.1.2. The CAB shall evaluate the operations of the client against the ASC standard to be audited and identify any environmental, operational, social or economic threats to its conformity to ASC requirements that are not included in Table F2.
- A. The CAB shall add the identified threats to Table F2.
- B. These additional threats and associated risk assessment shall be included in the audit report.
- F4.3.2.1.3. The CAB shall develop thresholds for determining whether the threat is a low, medium or high risk and shall include this information in Table F2 in the audit report.
- A. This determination shall be based on the likelihood of the occurrence and the level of impact if each threat occurs during the term of certification as shown in Table F1.

**Table F1 - Table of Risk Classification**

		Likelihood		
		Unlikely	Possible	Likely
	Major	Medium Risk	High Risk	High Risk
	Moderate	Low Risk	Medium Risk	High Risk
	Minor	Low Risk	Low Risk	Medium Risk

F4.4. All threats assessed and their risk classification shall be described and justified in the audit report.

**Table F2 - Risk Evaluation Matrix**

<b>Risk evaluation matrix</b>			
<b>Threat</b>	<b>Low Risk</b>	<b>Medium Risk</b>	<b>High Risk</b>
Multiple sites operating in the same receiving water body(ies).	No other sites are operating in the receiving water body(ies).	All other sites operating in the receiving water body(ies) are certified.	Uncertified sites are operating in the same receiving water body(ies).
<b>GROUP MANAGEMENT BODY</b>			
Management system weakness	The Group Management Body is certified to a recognized management system standard such as ISO 9001 or 14001.	The Group Management Body is not certified to a recognized management system standard such as ISO 9001 or 14001.	The Group Management Body is not certified to a recognized management system standard such as ISO 9001 or 14001 the CAB has raised open NCs (major or minor) against the Group Management Body.
Use of resources	Central buying, complete records	All purchasing for certified operations is centralized but subject to local decision.	Supplies are purchased as needed and approved by more than one individual.
<b>COUNTRY OF OPERATION</b>			
ASC certification in country of operation			The client's operations are the first to be considered for ASC certification in the country, or other certified operations in the country have not been certified for at least one certification cycle.

<b>Risk evaluation matrix</b>			
<b>Threat</b>	<b>Low Risk</b>	<b>Medium Risk</b>	<b>High Risk</b>
Country risk assessment score found on Transparency International's latest corruption perception index on the latest year's CPI for the country in which the operations are sited. (For the latest scores see <a href="http://cpi.transparency.org">http://cpi.transparency.org</a> ).	Above 62	Between 32 and 62 inclusive	31 or less
<b>PREVIOUS AUDITS AND RECORDS OF COMPLAINTS</b>			
Record of NCs and response	No open NC	Open minor NC	Open Major NC
Record of complaints	No complaints	Complaints are addressed in a timely fashion and resolved.	Open complaints on file; evidence that resolution is delayed or not achieved.

#### F4.4.1. Sampling Level

F4.4.1.1. Using the highest risk category assigned to any identified threat in F2 the CAB shall use the formula below to determine the appropriate level of sampling.

F4.4.1.2. Sample sizes shall be calculated using the formula identified in F4.4.1.3 for sites, records and worker interviews.

F4.4.1.3. Sample sizes shall be determined as follows:

F4.4.1.3.1. Low Risk: no fewer than the square root of total number, divided by two, rounded up.

F4.4.1.3.2. Medium Risk: no fewer than the square root of total number, rounded up.

F4.4.1.3.3. High Risk: no fewer than the square root of total number, multiplied by three, rounded up.

A. Where there are ten or fewer sites, records or workers to sample, the audit team shall sample 100%.

- B. Where there are eleven or more sites, records or workers to sample the audit team shall sample no fewer than the square root of total number, multiplied by three, rounded up.

F4.4.2. Sample selection

- F4.4.2.1. A minimum of 10% of all member sites inspected by the CAB in an audit shall be unannounced, to both the member and the Group Management Body.

- F4.4.2.2. The allocation of the sample size determined in F4.4.1.3 shall include:

- F4.4.2.2.1. No less than 20% shall be selected randomly

- F4.4.2.2.2. No less than 50% shall be selected by the audit team based on medium and high risk threats identified in section F4.3 above.

- A. For samples selected where there are only low or no risks identified F4.4.2.1. shall not apply.

F4.4.3. Audit plan based on risk categories and sampling levels

- F4.4.3.1. The audit plan shall:

- F4.4.3.1.1. Apply the sampling level as determined,

- F4.4.3.1.2. Ensure that the audit plan adequately covers all requirements for certification as stated in the *ASC Requirements for the Certification of Producer Groups* and in the *ASC Certification and Accreditation Requirements* (this document),

- A. The CAB may include witness audits of internal inspectors in the audit plan.

- F4.4.3.1.3. Identified areas of high risk shall be evaluated in each audit conducted by the CAB, and

- F4.4.3.1.4. The sampling level for all sites, records and worker interviews shall be dictated by the highest level of risk identified and be applied to the entire audit.

F4.4.4. Surveillance planning based on risk categories and sampling levels

- F4.4.4.1. For surveillance audits the CAB shall revise its risk analysis of the client using the same risk based method described in Annex F to determine the rate of sampling as has been used for the initial audit.
- F4.4.4.2. Threats may be added or removed based on audit evidence and other information gathered in previous audits and stakeholder input received by the CAB.
- F4.4.4.3. Risk classifications and sampling levels may change from audit to audit based on the information gathered in previous audits and new information gathered.
- F4.4.4.4. All ASC certification requirements relevant to threats that are determined to be high and medium risks shall be audited in every surveillance audit.
- F4.4.5. Re-certification
  - F4.4.5.1. For re-certification audits of Group Management Bodies the CAB shall revise its risk analysis of the client using the same risk based method described in Annex F to determine the rate of sampling for the re-certification audit.
  - F4.4.5.2. The revision of the risk analysis for re-certification audits shall take into account all risk information gathered in previous audits.

## **F5. Risk and Sampling level determination**

- F5.1. Based on the procedures described in F4.3 above, the CAB shall make the following determinations and communicate them to the Group Management Body at the closing meeting:
  - F5.1.1. The sampling rate for records and worker interviews to be used in all internal audits for next years' internal inspections of each group member, each registered site and the internal audit of the Group Management Body and,
  - F5.1.2. Risk areas that shall be evaluated in all internal inspections and internal audits of the Group Management Body.
- F5.2. In the next scheduled audit, the CAB shall verify that:
  - F5.2.1. The sampling levels as determined by the CAB have been implemented in all internal inspections of group members and internal audits of the Group Management Body and,



F5.2.2. The risk areas identified by the CAB have been included in all internal inspections of group members and internal audits of the Group Management Body.

F6. The Group Management Certificate shall include:

F6.1. An appendix listing all individual sites participating in the group certification

F6.2. The authoritative list of member sites shall be the Register of Sites.

F7. All non-conformities, regardless of whether they are raised against the Group Management Body or an individual site, shall be considered as non-conformities of the Group Management Body.

F8. The Certificate shall be suspended or withdrawn in its entirety if the Group Management Body does not conform to the requirements for certification or maintaining certification within the timelines specified by the CAB.

## Definitions to be added to CAR Annex A – ASC Vocabulary

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<b>Group Certification</b>	Collective certification against one ASC standard by a group of two or more producers, regardless the size of their site(s), whereby the Group Management body has the responsibility and authority to implement and maintain all relevant ASC requirements for the group’s compliance.
<b>Group Management Body</b>	The person or group of people who manages and is responsible for the actions of the group.
<b>Group Management Body Representative</b>	Individual appointed by Group Management Body who is the contact point for the certification certification-related issues.
<b>Group Member</b>	Aquaculture or feed producer operating one or several production sites and participating formally in a group for the purpose of applying for, obtaining and maintaining ASC certification as part of a Group.
<b>Site</b>	Production facility owned or operated by an individual, company or partnership that is included in the unit of certification.
<b>Internal Inspection</b>	A review of the compliance of a Group Member with ASC Standard and Group requirements.
<b>Internal Inspector</b>	A person appointed by Group Management Body to undertake an internal inspection of individual Group Members.
<b>Internal Audit</b>	An independent and objective review of compliance of the management system of the Group Management Body that includes ASC requirements.
<b>Internal Auditor</b>	A person appointed by the company or Group Management Body to undertake internal audits.

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## **Report template for groups**

See excel spreadsheet *ASC Audit report template - Group DRAFT v2* sheets d(b) & d(c)