Terms of Reference for the formation of the Technical Working Group on ASC Certification requirements for remote auditing

1. Background

The ASC
The Aquaculture Stewardship Council (ASC) is an independent not for profit organisation founded in 2010 by World Wildlife Fund (WWF) and the Dutch Sustainable Trade Initiative (IDH) It aims to be the world’s leading certification and labelling programme for responsibly farmed seafood.

For more information please visit https://www.asc-aqua.org/about-us/about-the-asc/

2. CAR Review

As a full ISEAL Alliance member, ASC is required to review, and revise its standards every 5 years. The last revision of the CAR was issued in December 2015 with version 2.0. Subsequent additions to the CAR were the requirements for multi-site certification (v2.1 in August 2017) and group certification (v2.2 in April 2019).

During the implementation of the ASC certification program, there were detected some areas not currently addressed in the ASC certification and Accreditation Requirements (CAR) or ASC standards, showing the need to include requirements covering these areas to increase the rigour of the certification program.

The next CAR review is intended to go to public consultation in August-September 2020 to be issued in 2021 first quarter.

3. Remote auditing at ASC audits

Document review is a key element to collect evidence of compliance from applicants and certificate holders. The time is limited during on-site audits and the most common practice from CABs is to try to review this documentation on-site. This may bring deficiencies in the quality of evaluation, key evidence for compliance may be missed and on-site audit time may be unnecessarily extended. In remote locations, some farms are not able to maintain the audit team for those long periods of time because of logistics limitations such as accommodation and transport.

There are also some activities that are difficult for the audit team to observe during audits because of the timing of such activities, an example is long cycle species harvesting. ASC has published an interpretation for CABs allowing them to use remote audit techniques as real-time video recording to observe the execution of harvest activities with some conditions. (https://asc-portal.force.com/interpret/s/article/Q-A-94-CAR-v-2-1-17-4-2 Option 2.)

Finally, the availability of farm key staff (i.e external veterinarians) or stakeholders during the audit sometimes is limited. Interviews with this key people can be conducted remotely if they won’t be available during the onsite audit.
4. **Scope and objectives Technical Working Group (TWG) for remote auditing**

The main objective of the TWG is to develop aligned requirements for CABs and Units of Certification for remote auditing as an audit technique to evaluate compliance during audits.

The development of such requirements will require the input from external professionals with expertise in food/aquaculture industry and certification processes which need sampling and testing as tool to demonstrate compliance.

These requirements should cover at least the following:

- Frequency based on risk
- Number of samples
- Sample preservation and chain of custody
- Testing methodologies
- Laboratories accreditations
- Results confidentiality

5. **TWG members**

The TWG needs to collect expertise among their members to provide practical, realistic and auditable requirements which bring robustness to the certification program.

The technical working group should be formed by 6-8 members having together the following expertise

- 4 years in Feed industry implementing quality management systems
- 4 years in product certification/inspection which involves sampling.
- 4 years implementing certification schemes managing credits systems.
- 1 SaS member
- 1 PAT member

6. **TWG plan**

The following table escribe the expected timelines for the TWG and deliverables

<table>
<thead>
<tr>
<th>Activity</th>
<th>November</th>
<th>December</th>
<th>January</th>
<th>February</th>
</tr>
</thead>
<tbody>
<tr>
<td>Invitation to TWG potential members</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Draft requirements structure</td>
<td>x</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>TWG first meeting</td>
<td>x</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Requirements first draft</td>
<td></td>
<td>x</td>
<td></td>
<td></td>
</tr>
<tr>
<td>TWG second meeting</td>
<td></td>
<td></td>
<td>x</td>
<td></td>
</tr>
<tr>
<td>Final draft for TAG</td>
<td></td>
<td></td>
<td>x</td>
<td>x</td>
</tr>
</tbody>
</table>
7. **Meetings:**
   - Meetings will be conducted via teleconferences (skype or gotomeeting).
   - Meetings schedules will be consulted with the TWG members in advance.
   - Meetings will be conducted with at least ¾ of members

8. **Assessment of Risk**

   At this stage the ASC can only identify generic risks in terms of changes to the current standards in case of revision. These risks will be further elaborated once it becomes clearer regarding the direction of proposed changes. This TOR will again be updated accordingly.

   **No 1: Intended Identified risk**
   Auditors will need to be retrained to safeguard consistent implementation of any changes. It may prove difficult to have all auditors (re)trained in time, especially if an in-person training is required.

   **Strategy for managing risk No 1:** Development of training materials and planning of training will be planned as far in advance as reasonably expected and may involve on-line delivery.

   **No 2: Unidentified risk**
   Resistance by audited farms (certified and in assessment) leading to the possibility that certified farms would leave the programme due to the changes, or some farms would be willing to join the programme. Farms would have to adjust their practices to meet changes to the standards, and possibly additional resources used to meet future compliance (e.g. training for workers, efforts to find new inputs suppliers, and lower productivity and practices).

   **Strategies for managing risk No 2:**
   To avoid risk No 2, the ASC engages various stakeholders in its standard setting, review and revision processes to make sure that the standards or changes are applicable and accessible. Besides, the ASC is also committed through other policy developments (e.g. group certification, harmonization and quality and assurance processes) that will be launched soon will also contribute to reducing implementation and certification costs for farmers, especially the small holder. The ASC is also willing to offer training for farms to raise their awareness of sustainable and responsible farming and reduce impacts of the sector as a whole, providing that funds are available to implement this strategy.

9. **Contact information**

   o Key contact person: Marcelo Hidalgo – Standards Coordinator
   o Email: standards@asc-aqua.org
   o Address: HNK, Weg der Verenigde Naties 1, 3527 KT Utrecht, Netherlands

10. **Annex**

    Annex 1 - Scope of review content