



IFFO RS Standard Version Change

TERMS OF REFERENCE (ToR) Process Development Requirements

Purpose

This document highlights the areas that will need to be conducted each time a new version of the IFFO RS standard is developed. The following section document describes the steps that were conducted when developing and agreeing the new Terms of Reference for Version 2 of the IFFO RS standard.

IFFO RS Version 2 Terms of Reference

Background Information

The IFFO RS standard has been in existence since 2009 and is now on Version 1 Issue 6. The original objectives of this standard as set by the Version 1 Technical Advisory Committee in 2008 were to:

- Eradicate Illegal, Unregulated and Unrecorded (IUU) Fishery Products being used as Raw Material for IFFO RS Compliant Fishmeal and Fish Oil
- Ensure that Whole Fish used in the production for Fishmeal and Fish Oil are sourced from responsibly managed fisheries.
- Ensure the safe manufacture of Fishmeal and Fish Oil.
- Have effective traceability systems in place to ensure that the IFFO RS Compliant Fishmeal and Fish Oil can be traced back to the approved IFFO RS Raw Material Fishery.

In subsequent amends of Version 1 of the IFFO RS standard additional requirements have been approved to include the following objectives:

- Fish By-products or Trimmings used in IFFO RS Compliant Marine Ingredients must not come from fish species that are classified as endangered on the International Union for Conservation of Nature (IUCN) list and must be derived from fish intended for direct human consumption.
- Certified factories must commit to having Environmental and Social Policies in place.

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The IFFO RS programme has also developed a separate IFFO RS Chain of Custody standard designed to protect the integrity and providence of all labeled IFFO RS Compliant Fishmeal and Fish Oil as it passes through the global Supply Chain.

The current IFFO RS standard has 111 certified factories utilising 18 approved whole fish fisheries and around 100 approved by-product fish fisheries. In addition, the Chain of Custody Standard has 51 certified sites from 23 applicant companies. The IFFO RS programme has a global reach and has certified applicants in 18 countries around the world.

To ensure that the IFFO RS programme remains at the forefront of Marine Ingredients (Fishmeal and Fish Oil) sourcing and production, the IFFO RS Governance Board, at a meeting on 25th November 2014, ratified a proposal to review and enhance the standard to meet with the expectations of the Marine Ingredient Manufacturing Sector and the global Supply Chain by the development of new Version 2 of the IFFO RS standard with enhanced strategic objectives.

The Proposed Terms of Reference for Version 2 of the IFFO RS standard are as follows:

Enhanced Key Objectives for Version 2:

- To continue to meet the objectives set in the development of Version 1.6 of the IFFO RS standard
- To enhance the IFFO RS Approval Criteria for whole fish used as a raw material for IFFO RS compliant production to promote more responsible fishery management.
- To promote more efficient Marine Ingredients production practices to reduce the environmental impact of the Fishmeal and Fish Oil Manufacturing Process.
- To promote and create improved social and welfare benefits for all workers employed within the Marine Ingredients Manufacturing Sector.
- To develop this Version 2.0 of the standard to be in compliance with the ISEAL Code of Practice for Setting Social and Environmental Standard V5.0.

Version 2 Key Development Activities:

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- To re-develop the IFFO RS Approval Criteria for raw material fisheries to incorporate key elements of the FAO Code of Conduct for Responsible Fisheries 1995 and the 2014 Asia-Pacific Fishery Commission (APFIC) publication “Regional guidelines for the management of tropical trawl fisheries in Asia” to enhance the robustness of the current single fishery approval methodology.
- To develop an additional set of IFFO RS Approval Criteria for raw material fisheries defined as mixed fisheries to determine how they can be reviewed and assessed for use as Raw Materials for Fishmeal and Fish Oil Production.
- To re-develop IFFO RS Factory Conformance Criteria to assess Good Manufacturing Practice to ensure safe practices are exhibited and to reduce the environmental risk of the production processes.
- To develop a new set of IFFO RS Factory Conformance Criteria to take into account the International Labour Organisation ILO convention to assess the Social and Welfare Rights of Employees within the Marine Ingredient Producing Factories.

Rationale and Risk Analysis for the Implementation of Version 2

1-Raw Material Assessment Methodology

The IFFO RS standard already accepts fisheries that are certified to the MSC standard as an approved Raw Material without the requirement of any further assessment assurance. However, as the Unit of Certification for the IFFO RS standard is a factory, the standard does not insist upon this level of certification (MSC standard), but does require Applicant Fisheries to be able to exhibit a high level of compliance to the key clauses of the FAO Code of Conduct for Responsible Fisheries 1995 in the form of a set of IFFO RS Approval Criteria.

The current methodology was developed using the key clauses of the FAO Code of Conduct for Responsible Fisheries 1995 to assess the responsible management credentials of a whole fish fishery used to product IFFO RS compliant marine ingredient. The fishery assessment methodology has been found to be effective on fisheries that are predominantly, single species and already have an abundance of scientific research in place to support the long management of the fishery.

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A number of Fisheries used in Fishmeal and Fish Oil Production, which are from this type of fishery category, have been assessed and successfully approved, however, the Raw Material Assessment Teams have found that for Fisheries that are defined as mixed and have little scientific data this current methodology alone, has been found to be less effective and could lead to some inconsistencies between Fishery Assessments.

To rectify this issue the IFFO RS programme conducted a feasibility study on the use of the Asia-Pacific Fishery Commission (APFIC is an FAO Article XIV body with 21 contracting governments to the Commission) guidelines that were developed for their mixed trawl fisheries and concluded that components of these APFIC guidelines could be used in a broader manner to adapt the existing IFFO RS Fishery Assessment Process, especially for Fisheries that may wish to join the IFFO RS programme. Specifically, the incorporation of a Risk Assessment Matrix and Productivity-Susceptibility Analysis could improve the ability of the IFFO RS programme to assess Fisheries which have limited information (Data Deficient) and those managed as Multi-Species Fisheries. Additionally, such measures could **potentially reduce the level of subjectivity** present in the scoring system by helping to provide more clearly-defined clause ratings.

2- Factory Assessment Methodology

To reduce increasing audit duplication the IFFO RS standard required that all Factories be assessed and certified to an International Feed Ingredient Standard (IFIS) Good Manufacturing Standard e.g GMP+ or FEMAS or to another standard that has been benchmarked as being equivalent.

Version 2 of the IFFO RS standard still proposes to accept these standards but will review their requirements and develop a set of GMP (and/or equivalent) conformance criteria that will still promote safe production of marine ingredients but will also look how these may reduce the environmental impact of the factory.

Factories that currently hold an IFIS standard certificate will only be required to be assessed on those identified unique IFFO RS GMP factory conformance criteria that are not currently covered within an IFIS standard. Factories that have no IFIS standard will not be required to get the IFIS standard now as a pre-requisite, but will be assessed to all the new IFFO RS GMP factory conformance criteria.

IFFO RS has conducted a risk assessment and this has provided evidence that not all the requirements of the IFIS are completely relevant for the fishmeal manufacturing factory and do not think that the development of this standard is as up to date on environmental issues that will be required by this industry in the forthcoming years.

From a SWOT analysis conducted by the IFFO RS secretariat it was concluded that some of the weaknesses encountered by only recognising the IFIS standard and equivalent is that the accessibility to the standard is reduced, there is a reduction of control by IFFO RS secretariat (full responsibility of IFFO RS governing body for defining the normative reference for responsible marine ingredients), IFIS and equivalent are not recognised in the value chain of fish oil for human consumption and that there is a risk of losing opportunity

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for ISEAL compliance. Due to the results of this SWOT analysis it was decided to consider the development of GMP clauses into the next version of the IFFO RS standard.

The removal of the IFIS standard as a pre-requisite requirement will also remove a potential barrier for marine ingredients producer factories from entering into the programme, as they will now not be dependent on another standard programme to certify them before they can be considered for IFFO RS certification.

3- Certification Assurance and Standard development

The plan for Version 2 will be to have this standard certified by fully accredited ISO 17065 certification bodies, which is consistent with Version 1. In addition, this standard will be developed to allow the IFFO RS programme to be consistent with recognition by the ISEAL Alliance.

Proposed Version 2 Standard development Process

- Draft ToR agreed by IFFO RS Governance Board(GB)
- ToR placed in Public Consultation for 30 days to seek stakeholder input from those directly and indirectly affected by this proposed new version
- Final ToR approval by IFFO RS Governance Board
- Bespoke Technical Advisory Committee (TAC) Selected to develop the IFFO RS Version 2
- Draft of Standard part 1 (fisheries criteria) developed and agreed by TAC
- Draft part 1 (fisheries criteria) placed in Public Consultation for 30 days to seek stakeholder input and engagement
- Draft of Standard part 2 (factory criteria) developed and agreed by TAC
- Draft of full Standard agreed by IFFO RS GB
- Agreed Standard placed in Public Consultation for 60 days to seek stakeholder input and engagement
- Final approval of Version 2 IFFO RS by IFFO RS GB

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The development of Version 2 of the standard will plan to take no longer than 12 calendar months from the point where the ToR is approved by the IFFO RS GB. However, more time may be needed in case extra rounds of public consultation are required.

Proposed Technical Competencies for the Version 2 Technical Advisory Committee (V2 TAC)

On agreement of the Version 2 ToR, the IFFO RS secretariat will seek and consult with key individuals which can offer the correct level of competency and expertise to form the V2 TAC and be able to create a set of credible, conformance criteria for the development of the new version of the IFFO RS standard.

The proposed expertise for the V2 TAC will need to be able to demonstrate expertise and competency in covering the following key areas:

- Fishery assessment methodologies
- Fishmeal and fish oil good manufacturing practices
- Environmental Assessment Impacts
- Social and Welfare Assessment Criteria
- Standard setting requirements to meet ISO 17065 and ISEAL criteria

Once formed, the V2 TAC will be governed by a bespoke set of Terms of Reference for the role they will be required to perform and this body will be overseen by the IFFO RS Governance Board to ensure that the approved ToR for the new version of the standard is being adhered to.

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AMENDMENT LOG

DATE	ISSUE	AMENDMENT	AUTHORISED BY
13/05/2015	1.0	Introduction of IFFO RS Ltd	Francisco Aldon
12/04/2016	1.1	Editing of title from ' <i>IFFO RS Standard Version 2</i> ' to ' <i>IFFO RS Standard Version Change</i> '.	Francisco Aldon
12/04/2016	1.1	Addition of 'Purpose' in paragraph one ' <i>This document highlights the areas that will need to be conducted each time a new version of the IFFO RS standard is developed. The following section document describes the steps that were conducted when developing and agreeing the new Terms of Reference for Version 2 of the IFFO RS standard.</i> '	Francisco Aldon
12/04/2016	1.1	Updating of amount of factories, fisheries and by-products in 'Background information, paragraph 4 ' <i>The current IFFO RS standard has 111 certified factories utilising 18 approved whole fish fisheries and around 100 approved by-product fisheries. In addition, the Chain of Custody standard has 51 certified sites from 23 applicant companies.</i> '	Francisco Aldon
12/04/2016	1.1	Addition of the wording ' <i>GMP (and/or equivalent)</i> ' in 2 – Factory Assessment Methodology, second paragraph	Francisco Aldon

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