



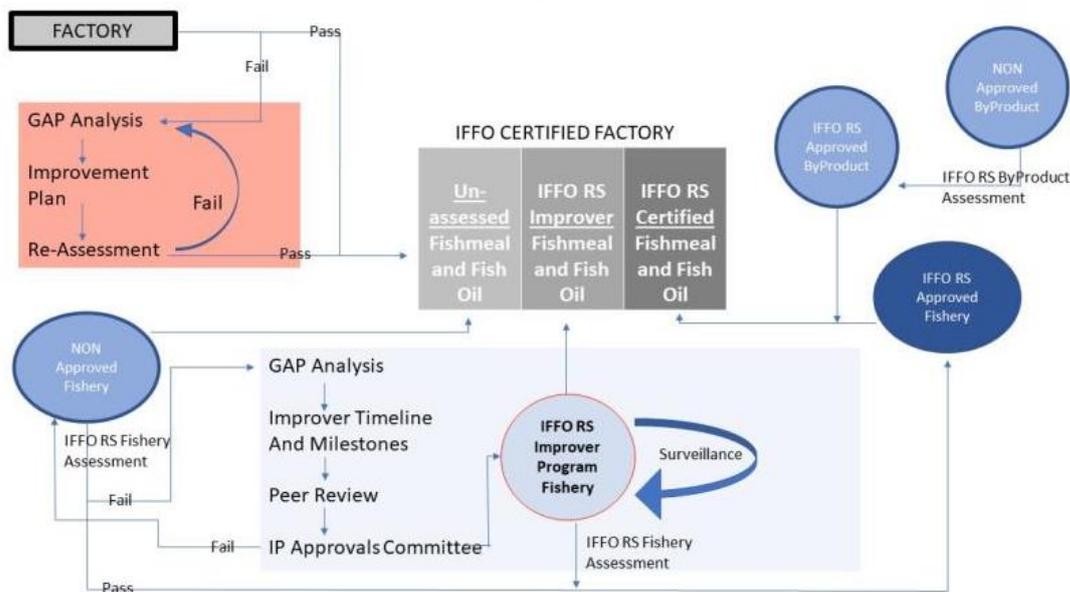
The IFFO RS Fisheries Improver Programme: Application Process & Surveillance Procedures

This document sets out the process by which the fishery component of the IFFO RS Improver Program (IP) is operated. The IP provides a mechanism by which fisheries which do not currently meet the IFFO RS requirements can work towards approval for certification along a structured pathway and in alignment with the IFFO RS Quality Control Manual, to provide guidance on good practices. The programme also enables such fisheries to obtain recognition for consistent progress made towards achieving IFFO RS approval. Fisheries approval in IFFO RS is based on meeting the requirements laid out in the FAO’s Code of Conduct for Responsible Fisheries (CCRF, <http://www.fao.org/3/a-v9878e.pdf>).

The following IFFO RS IP stages make up the core of the process by which fisheries obtain and maintain membership of the IFFO RS IP:

1. IFFO RS IP Assessment and GAP Analysis
2. Development of a Stakeholder led Fishery Action Plan (FAP)
3. Signed Agreement between Stakeholders
4. Peer Review and Application Committee
5. Fishery Action Plan Tracker & Surveillance Assessments
6. Progress towards Fishery Approval

The main body of this document details the procedures associated with each of these key steps. The light blue area in the diagram below demonstrates the position of the fishery improver processes within the broader IFFO RS work programme:





1. IFFO RS IP Assessment & Gap Analysis

The objective of the IP assessment and gap analysis of an applicant fishery is to determine the areas in which the fishery does not currently align with the FAO's CCRF objectives and principles, and hence does not meet the IFFO RS requirements. The IP assessment is essentially a full assessment using the usual IFFO RS fishery assessment criteria, with the key exception that the results are designed to highlight information, management and status gaps. These gaps are summarised via the gap analysis. The IP assessment report also contains additional information on the background of the fishery (as described below).

IFFO RS IP Assessment

The IFFO RS IP assessment is carried out by independent parties with expertise in benchmarking seafood certification schemes, and where deemed trained, competent and relevant to the IFFO RS standards by the IFFO RS Secretariat. The purpose of the evaluation is to establish the nature of the gaps and deviation from full IFFO RS certification, as well as the feasibility of the unit of assessment being requested to close those gaps within a specified time period.

The primary objective of the IFFO RS IP assessment is to gather information to support the production of the GAP analysis and, in Stage 2, the Fishery Action Plan.

IFFO RS IP Assessment Method

IFFO RS IP assessment is led and arranged by an IFFO RS approved assessment team. Such a team will possess relevant knowledge and expertise for the fishery assessment scope.

The assessment team shall inform the applicant of the purpose and objectives of the IFFO RS IP assessment process. The objectives of this process are as follows:

1. To understand the status of the fishery in the context of the IFFO RS standard;
2. To inform the applicant of any areas of fisheries management that need to be addressed by the applicant in achieving approval of their fishery;
3. To act as a foundation for the formulation and execution of a Fishery Action Plan.

The IFFO RS IP assessment identifies the fishery stakeholders (those involved in the management of the fishery, in particular). The applicant shall facilitate the IP assessment by providing access to supporting information and evidence as required. The IFFO RS IP assessment shall be based on, but not restricted to, reviewing fishery documentation and direct communications with fishery stakeholders.



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In addition to completing a full fishery assessment using the standard IFFO RS fishery assessment template, the assessment team shall ensure the following issues are documented:

1. General background information on the history of the fishery, especially including data on landings, vessel numbers and type, gear and any details on harvest controls;
2. General information on the species in the fishery, and where possible their life history strategies within the geographical location of the fishery, and any history of stock population structures in those locations;
3. Current principal management authority governance, including policy objectives and/or relevant regulations;
4. Recent (less than 10 years) fishery landings and the general economic situation of the fishery;
5. Overview of the fishery including an organisation identified with responsibility for the fishery, detail on fishery management practices, scientific assessment of the stocks, and a clear definition of the unit of assessment being proposed;
6. Other relevant fisheries in the vicinity not subject to assessment but that may interact with the fishery being assessed;
7. External factors (any social, economic or environmental issues) that may affect the fishery and its management;
8. A list of key stakeholders in the fishery and their special interests, where relevant; and
9. If relevant, information for any subsequent product Chain of Custody certification.

The IP assessment report shall include the following:

1. An overview of the fishery management framework with an organisational plan of the principal management organisations, their roles and responsibilities;
2. A review of the availability of data in the various categories to be included;
3. A determination of the overall scope of the full assessment;
4. A description of potential obstacles or problems that may be barriers to approval within an agreed reasonable period of time;
5. Identification of organisations and entities that will be important for engagement in the event of a full assessment.

Site visits

Site visits are not a mandatory component of the IFFO RS IP application process, but they may be required or desired during an IFFO RS IP assessment, to enable direct discussion between the assessment team, the applicant, and other relevant fishery stakeholders, and where necessary to validate information.



The need for site visits to a fishery is dependent upon the complexity of the fishery and the level of information available. The final decision on whether a site visit is required will be made by the assessment team after an initial review of the fishery assessment complexity, but can also be requested by the applicant if desired. If a site visit is requested or deemed necessary, dates and schedules are organised by a member of the assessment team and with the agreement of the applicant and fishery stakeholders. Confirmation of the site visit plan and agenda is provided by the assessment team to each entity involved.

Assessment team training, briefing, coordination and defining specific roles

The size of the assessment team should be commensurate with the level of complexity and urgency of the IP application. A single assessor is permissible, as long as they possess the required skillset.

The decision to utilise more than one assessor shall be based on the technical complexity of the fishery and competency profile of individuals. Normally, large-scale fisheries that exist over a transboundary and/or multiple states shall require at least 2 assessors. Where the applicant is a smaller scale, national or regional fishery, one assessor may be appropriate for use, assuming the assessor has experience in all the key areas reviewed in the IFFO RS IP assessment report.

The proposed assessor(s) must be approved by IFFO RS to ensure they meet the required levels of competency. IFFO RS will ensure they meet the following criteria:

1. A lead assessor with verifiable experience in one or more areas of fisheries science and/or management, as listed below:
 - i. Local expertise (thorough knowledge of the fishery management organisations, fishery activities and other appropriate expertise); or
 - ii. Specific expertise, either in fishery stock assessment, fishery ecosystem interactions, socio-economic interactions, or fishery resource management practices, depending on the fishery.
2. Members of the assessment team must also be able to demonstrate appropriate knowledge of the IFFO RS IP application process by meeting the following requirements:
 - i. Completion of a full IFFO RS V2 fishery assessment training session
 - ii. Successfully passing the fishery training assessment exam
 - iii. Completion of a full IFFO RS Improver Programme training session

Once an assessor has been accepted by IFFO RS to support a fishery application to the IP, they will remain under probationary approval until such time as they complete a credible FAP, reviewed by IFFO RS. At this point the assessor shall become fully approved to provide further IP support and will not require IFFO RS approval on subsequent fisheries.



Assessors will be briefed on the basis of their specific role in the Assessment Plan. Training and confirmation will be required for all appointed assessors. Potential assessors should declare any potential conflict of interest, and any undeclared conflict may be used as grounds for rejection of the application by the Application Committee.

Desktop review and analysis of information

Desktop review and analysis of fishery and fishery-related information form a major component of the IP assessment.

Fishery information:

Information types and sources can range from legal instruments such as acts, regulations, and laws; official documentation published or required for collection by the management authorities or official organisations (permits, landing declarations, official catch records).

Review activities may include scientific and statistical information concerning the status of the fishery resource, such as agency reports, stock assessments, and supporting research from state or official scientific sources organisations, including published science or objective information from independent research produced by recognised institutions or otherwise credible sources.

Where possible, independent information should be peer-reviewed and published, although the assessment team must review the validity and importance of information on the outcome of the assessment. 'Softer' unofficial information, either in printed format or contributed verbally at meetings, may also be used in supporting the general body of documented information. The assessment team will be sure to make clear the source of all evidence and remain aware of the source when considering its relevance and reliability. Any concerns, including if information contains conflicting facts with other sources, shall be highlighted to the peer reviewer and Application Committee.

Fishery-based information can come from a number of areas, both directly and indirectly from the client fishery, management organisations, fishery participants and associated entities, and (if required) through on-site interviews and witnessing of management processes.

The IP assessment should proceed according to the procedures set out for the full IFFO RS fishery assessment. This includes the use of the fishery assessment template, guidance, and associated documentation as outlined in the IFFO RS Quality Control Manual and on the IFFO RS [website](#).

IFFO RS GAP Analysis

There are two main components to the GAP Analysis: information gaps, and status gaps. Information gaps are those areas in which there is currently insufficient information to enable



scoring of the relevant section of the IFFO RS fishery assessment. Status gaps are those where there is sufficient evidence to enable the assessment team to reliably determine that the fishery does not currently meet the requirements of the relevant section.

The assessment team will utilise the results of the IP assessment to assign a Gap Rating (Pass, Status Gap or Information Gap) to each section of the IFFO RS fishery assessment. The Gap Rating signifies the confidence of the assessment team in the quality of information that demonstrates conformity of the fishery at meeting a particular clause.

Where there are multiple members of the assessment team, the members should work individually in reviewing the evidence and compiling the rationales for each assigned clause. A preliminary rating is assigned in each case and recorded in the report, and the assessment team should strive to reach consensus on the Gap Rating for each clause.

The definition of Gap Ratings assigned by assessors shall be as follows:

Information Gap Rating

Information/evidence is inadequate or contradictory to determining whether an element of the fishery complies with the requirements of this section of the IFFO RS fishery assessment. In these cases an Information Gap rating is assigned. These are areas in which additional information is needed before the assessment team can reliably determine whether the fishery meets the IFFO RS requirements, therefore the assessment will be temporarily paused until the Information Gap is closed. These gaps may be solved via discussion with the fishery stakeholders to obtain further information. Alternatively, the generation of additional data (via, for example, a new fishery data collection regime) may form part of the Fishery Action Plan. In either case, the determination in this section will need to be reviewed once sufficient information is available to determine whether the fishery is awarded a Status Gap or a Pass rating.

Status Gap Rating

Information/evidence is sufficient to reliably demonstrate that the fishery is not in compliance with the requirements of this section of the IFFO RS fishery assessment. In these cases a Status Gap rating is assigned. These are areas in which the status of the fishery is well understood, but does not meet the IFFO RS requirement(s). These gaps will generally be solved via the development and application of the Fishery Action Plan.

Pass Rating

Pass ratings represent sections of the IFFO RS fishery assessment which have been passed by the fishery during the IP assessment. There is adequate information to reliably determine that



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the requirements have been met. These sections will generally not appear in the Fishery Action Plan.

2. Development of a Stakeholder-led Fishery Action Plan

The Applicant must develop and implement a Fishery Action Plan (FAP), with an associated and appropriate budget and deadlines, designed to address the deficiencies in the fishery necessary to achieve the project's objectives. The assessment team, which has expertise in both the fishery and the IFFO RS fishery assessment process, may be used to assist in the development of the FAP. The assessment team will have no say regarding the acceptance, or not, of the fishery onto the IFFO RS Improver Programme. After Peer Review by an approved and independent accredited Certification Body, the final decision will be made by the Improver Programme Application Committee (IPAC), who will make this recommendation to the IFFO RS Governance Board for the final confirmation.

Once accepted into the programme, the FAP, its associated deadlines and all other pertinent information must be made publicly available via the IFFO RS website and/or other recognised tools such as the FisheryProgress.org¹ website or equivalent, as approved by IFFO RS.

The budget does not need to be made publicly available, but evidence of an adequate budget for the project must be made available to the peer reviewer. A confidentiality agreement can be put in place if needed.

The Fishery Action Plan must include:

- A set of improvement objectives, based on the Gaps identified during the Gap analysis.
- Actions aligned with achieving the improvement objectives.
- Specific tasks under each action (if appropriate).
- Organisations or people responsible for completing each action/task.
- A month/year deadline for completing each action.

¹ To help fisheries to demonstrate continual progress, IFFO RS is working with recognised online fishery improvement project (FIP) data and information repositories that offer transparency and visibility for fisheries that are making demonstrable progress. One platform we're working with is FisheryProgress, a recently developed resource that provides information on FIP progress. FIPs provide updated data every six months which is used to track progress against a FIP's work plan, and is available for all FIPs including those seeking acknowledgement by third-party certification schemes such as the IFFO RS scheme. FisheryProgress is the first resource to meet this need, though other platforms with similar aims and objectives may be developed in the future. Collaboration between IFFO RS and FisheryProgress is useful because data around responsible environmental and social practices at the fishery level may facilitate the tracking of the fisheries' performance and, therefore, improvement against the relevant IFFO RS criteria. Those data may be used for IP Peer Review as part of the IP Application Mechanism.



The fishery assessment team must assist the applicant with the confirmation of the following for the Peer Reviewer:

- Actions/tasks align with improvement objectives.
- Timeframes are plausible.
- There are no major red flags or risks to achieving the Fishery Action Plan given the information provided, or any other information that may be available to the team.

3. Signed Agreement between Stakeholders

Participants must commit to financially and/or operationally invest in, and make improvements to, the fishery. Commitments should be formalised and may take the form of a signed memorandum of understanding detailing those commitments made by each participant (fishery stakeholders) involved in the FAP. At this point, the improvement effort involving multi-stakeholders, a credible FAP with a plan for regular reporting on improvements within a specified time frame will be termed a Fishery Improvement Project (FIP).

The agreement must include active participation by at least one company from each section of the supply chain. Participation means contributing financial or in-kind support to the project and/or a commitment to working on activities in the Fishery Action Plan.

Considered as a whole, the participant organisation(s) are referred to as the Applicant. The Applicant is responsible for submitting the IP application to IFFO RS. In addition to the IP assessment, the GAP analysis, and the Fishery Action Plan, the application must include the following details:

Applicant Name	<p>Accurately reflects the scope of the applicant fishery, being as specific as possible about location, species, and gear.</p> <ul style="list-style-type: none"> • If the applicant does not represent the whole fishery, the name should specify what portion is covered. • If multiple improvement projects exist in the fishery, names should distinguish between them.
IFFO RS IP Stage	<ul style="list-style-type: none"> • An indication of whether a Fishery Improvement Project (FIP) is already underway, and if so for how long it has been active, and how much progress has been made
Objective(s)	<ul style="list-style-type: none"> • One or more objectives that define the scope of the FAP.



	<ul style="list-style-type: none"> Objectives must be time bound (include end date), and measurable (e.g., by X date, the FAP will accomplish Y). Scope of objectives is appropriate for the fishery type
Description	<ul style="list-style-type: none"> 3 to 4 sentences providing additional detail on the FAP’s scope and objectives entered.
Primary Applicant Contact	<ul style="list-style-type: none"> Contact info for at least one public applicant contact entered.
Project Dates	<ul style="list-style-type: none"> Expected start date is based on whether there is an existing FIP in place; end date is based on the Fishery Action Plan. Month/year entered for both.
Species	<ul style="list-style-type: none"> At least one primary species selected.
Gear Type(s)	<ul style="list-style-type: none"> At least one gear type selected.
Location(s)	<ul style="list-style-type: none"> FAO Major Fishing Area completed. Information on EEZ and RFMOs entered if relevant. Information on the regulator of the fishery.

IFFO RS has produced standard Improver Programme application forms (Form 3A and Form 3B) which can be filled out to provide all of the required information.

Collaboration within a Fishery Improvement Project FIP

In some circumstances it may be appropriate for competing applicant organisations to cooperate to form a single robust and stakeholder approved FIP. If multiple industry organisations wish to develop a single FIP within the same fish stock and/or geographical region, the following principles must be adhered to:

- Mutual cooperation to promote FIP development.
- An MOU between all participants/ stakeholders in the FIP to allow collaboration and sharing of pertinent information should be produced.
- A lead Coordinator should be nominated and agreed to by all participants, to facilitate collaboration and communicate application and amendments to IFFO RS.



- Under normal circumstances, new FIP participants should be approved by a consensus, however it may be more appropriate in certain situations for a majority vote. The Application Committee may decide the most appropriate course of action on a case-by-case basis and this process must be fair to all parties involved.
- Duties relating to the FIP, including financial obligations, will be distributed fairly and agreed to by all parties.

Should an additional applicant join after the FIP has been accepted onto the IFFO RS Improver Programme, the nominated FIP Coordinator should re-submit the IFFO RS IP Application Form 3B to include the details of the new participants.

The IFFO RS IP allows multiple IP projects to be in place on a single biological stock; however, all FIPs will be reviewed by the IP Application Committee to ensure that the stakeholders required to achieve the changes set out in the FAP are engaged and committed to the process and evidence submitted is credible. Any applicant group which has not secured the engagement of all necessary stakeholders (e.g. national or regional governments, scientific organisations, industry groups, etc) will not be accepted into the Improver Programme. For this reason, during the formulation of the FAP, the applicant should actively seek to include other fishery stakeholders and, where necessary, collaboration between multiple FIPs should take place.

4. Peer Review & Application Committee

Peer Review

The IP assessment, GAP analysis outcome, FAP, and other application documentation shall form the application pack, which will be provided for Peer Review by an approved Certification Body Representative.

Peer Review sessions may be convened in person or, where distance and timing makes physical meetings difficult, sessions may be convened through formal conference call arrangements.

The IP assessment team shall arrange for the assessment and GAP Report. IFFO RS Ltd will then arrange for this to be reviewed by a peer reviewer from a Certification Body. The peer review team must be considered to be competent in all relevant aspects of fishery resource research and management, to the extent of being able to technically evaluate with confidence the content of the application pack.

Peer reviewers shall be briefed on the review process and be provided with a Peer Review Template and Guidance document (Annex 1), where they will formally report their work. The decision made by the Peer Review will then be recommended to the IP Application Committee



for a determination for acceptance of the Fishery. Final acceptance will be confirmed by the IFFO RS GB.

The following elements shall form the basis of the peer review and confirmation evaluation:

A Review of the full GAP analysis study conducted on the fishery raw material to confirm the gaps and challenges against the IFFO RS fishery approval criteria (as outlined in the Peer Review Guidance attached as Annex 1 in this document).

B Review of the applicant stakeholder committee, to ensure that it covers a balanced range of stakeholders including the industry value chain, fishery management and NGOs, in accordance with IFFO RS IP criteria. The peer reviewer shall also ensure that any organisation listed as being responsible for an Action in the Fishery Action Plan is part of the stakeholder committee.

C Review of the Fisheries Action Plan (FAP), to ensure it has been approved by the stakeholder committee and includes identification of key issues and stakeholders, prioritisation of actions and agreement on improvement milestones.

D Overall review of all application paperwork, including the application form, to ensure consistency and completeness.

Application Committee

The IFFO RS secretariat shall convene an Improver Application Committee Meeting with members of appropriate competence and independence as defined in the Application Committee Terms of References which can be found here ([click here](#)). Such competence shall be recorded in the IFFO RS secretariat documentation along with statements in respect to potential conflict of interest. The IP Application Committee will provide recommendations regarding approval or rejection of applicants for the IFFO RS Improver Programme to the IFFO RS Governance Board who will then make the have the final confirmation of this decision.

Approval decision

There are 3 possible Approval outcomes:

Full Approval: The IP Application Committee accepts the application pack, the peer reviewer's comments, and any other evidence submitted by the client. At this point the fishery is accepted into the Improver Program, where it will remain, subject to continuing to meet the progress and surveillance requirements as detailed below. This decision will be recorded in the IP Application Committee meeting Minutes.



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Pending Approval: The IP Application Committee is unable to reach a unanimous decision due to concerns raised by the committee or an inadequate Fishery Action Plan and whether these can realistically be corrected within a reasonable amount of time. The committee will provide an explanation of the reasons for the pending approval in order for the applicant to make the necessary adjustments, as described below.

Reject: The IP Application Committee or the IFFO RS Governance Board decides that the fishery improvement initiative cannot be Approved based on the evidence submitted and their concerns cannot be resolved by setting conditions on the fishery. The Applicant will be free to repeat the application process as desired. This will incur the cost of application each time and it will be at the discretion of the Application Committee to consider re-applications.

Pending Approvals

A Pending Approval may be awarded to a fishery where the Application Committee is unable to reach a unanimous decision, where there are concerns relating to the ability of the fishery to meet its commitments as outlined in the FAP, where there is deemed inadequate evidence to support the contents of the application, or where the FAP or any other component of the application is deemed inadequate. The purpose of a pending approval is to allow a fishery applicant an opportunity to correct relatively minor issues without having to re-enter the application process from the start.

A Pending Approval will be subject to one or more specific conditions placed on the fishery. These conditions will be time-limited, with deadlines which do not exceed 6 months from the time the Pending Approval is granted. The conditions will be based on ensuring the fishery corrects whatever issue(s) prevented the Application Committee from awarding a Full Approval, such that once the condition(s) are met Full Approval may be awarded.

A fishery with Pending Approval status will not be a member of the IFFO RS Improver Programme until the condition(s) are met. The fishery may re-submit the application for consideration by the Application Committee at any time that it considers the condition(s) to have been met, and does not have to wait until the deadline.

A conditional approval will only be awarded by the Application Committee and cannot be recommended by the initial assessment team. If the assessment team identifies any barriers to full approval prior to the initial application submission, these should be corrected before submission.



Notification of Approval Decision

All decisions on Approval status will be advised in writing to the respective applicants within 10 working days of the Application Committee meeting by the IFFO RS IP Secretariat. A copy of this correspondence will be held in the applicant's file.

These plans will be reviewed by and approved, in this order, by the assessment team, the peer reviewer, the IP Application Committee and subsequently the IFFO RS GB.

Complaints and appeals

Applicants or registered stakeholders that have been involved in the process can appeal against an approval decision using the IFFO RS Appeals and Complaints Procedure.

5. Fishery Action Plan Tracker & Surveillance Assessments

To ensure that an approved IP fishery remains in compliance with the requirements of the IP Programme, surveillance assessments will take place after 6 months, 12 months, and subsequently at least annually. More frequent surveillance assessments may be conducted if deemed necessary by the peer reviewer or Application Committee. Surveillance assessments will be conducted by an assessment team which meets the requirements described earlier in this document for assessment teams conducting the initial application assessment.

All surveillance assessments will proceed according to the following process:

Surveillance assessment team

The initial surveillance assessment of an IFFO RS IP fishery will occur 6 months after the fishery is accepted into the programme. Subsequent surveillances will occur 12 months after acceptance, 2 years after acceptance, and so on annually.

The surveillance assessment team will:

1. Familiarise themselves with the IP fishery by reviewing the application documentation, particularly the Fishery Action Plan, and any previous surveillance assessments.
2. Contact the IP fishery a minimum of 1 month before the surveillance assessment is due as a reminder to provide the information required to conduct the surveillance assessment.
3. Conduct a review of the status of the fishery against the tasks and actions which were identified in the Fishery Action Plan.



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4. Complete an IFFO RS IP surveillance report, culminating in a recommendation on whether or not the fishery should remain in the Improver Programme according to the surveillance determination approach described below.
5. Submit the surveillance report for peer review and review by the Application Committee, as described in Section 4 above.

The surveillance assessment team will focus on areas where actions have been defined by the Fishery Action Plan as being due, but will also consider any other evidence provided by the fishery and revise areas of the surveillance report accordingly. In areas where there were no defined tasks due and the fishery does not provide any evidence, the surveillance assessment team will conduct a brief review of publically available information to ensure no inappropriate actions have been taken.

The surveillance assessment team will communicate directly with the IFFO RS IP fishery to offer an opportunity to address any missing or unclear information as needed. Any enquiries and replies between the reviewer and IP fishery should occur within a reasonable timeframe (5 business days when possible). If a lack of information provision prevents the completion of the surveillance assessment within 1 month of the date it is due, the IP fishery will be suspended from the Improver Programme until such information is provided and the assessment report is completed.

Evidence

The fishery must submit the evidence to the surveillance assessment team demonstrating that the fishery has completed the tasks which are defined by the Fishery Action Plan as due to be completed by the relevant surveillance date.

The ultimate decision of whether evidence can be considered reliable will be made by the surveillance assessment team, who will generally require that evidence which is not publically available be documented in writing, dated, and have a defined source (whether an organisation or individual).

Evidence adequate to demonstrate that a Fishery Action Plan task has been completed will vary depending on the action. The following are potentially valuable sources of evidence:

- Scientific papers or drafts thereof, reports, conference presentations and papers;
- Meeting agendas and minutes;
- Letters sent to or from fishery stakeholders;
- Media articles;
- Fishery legislation or regulation.



Surveillance determination

An assessment determination is advised by the surveillance assessment team via the IP surveillance report, reviewed by the peer reviewer, and finally confirmed by the Application Committee. The determination is based on the extent to which the IP fishery has achieved the goals and completed the tasks outlined in the FAP. There are 3 potential surveillance determination outcomes:

- **Maintain IP status.** Where the fishery is able to demonstrate that it has completed the tasks defined by the FAP, the surveillance assessment team should recommend the IP status of the fishery be maintained.
- **Conditionally maintain IP status.** Where the fishery is not able to demonstrate that it has completed the tasks defined by the FAP, one or more conditions will be raised, against which its continuing IP membership will be contingent.
- **Suspend IP status.** Where a fishery has failed to provide sufficient evidence to demonstrate that it has met the requirements set by a Condition placed on it via a previous surveillance assessment, the fishery will be suspended from the IFFO RS Improver Programme.

Conditionally maintain IP Status

A fishery which is found to have fallen behind the timeline defined by the FAP, as described above, will have one or more conditions raised against its membership of the Improver Programme. The precise nature and timeline of these conditions shall be determined through the usual IP review process (i.e. recommended by the surveillance assessment team, reviewed by the peer reviewer, and finalised by the Application Committee), but will adhere to the following guidelines:

1. Where a fishery has failed to meet a defined milestone or complete a specific task, a Condition will be raised requiring that milestone to be met or task completed.
2. Any Condition raised will be subject to a time constraint in the form of a date by which the Condition must be met. The duration of the period given to meet the Condition shall take into account the individual fishery circumstances and the reason for the Condition being set, but shall not be more than 1 year (or 6 months if arising from the first surveillance assessment).
3. Any Condition with a deadline which does not match an existing surveillance date will be individually assessed by the surveillance assessment team via the surveillance assessment mechanism at the relevant time.



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- Any fishery which has not met a Condition by the assigned deadline will be suspended from the IFFO RS Improver Programme and awarded Suspended IP status, as described above and below.

Suspended fisheries

Fisheries which fail to demonstrate consistent progress along the FAP timeline will be suspended from the IP as described above, and following the procedures in the IFFO RS Quality Control Manual. A suspended fishery may be re-instated to the Improver Programme if it meets the requirements of the Condition(s) which resulted in its suspension within 6 months of the suspension (dependent upon continuing to meet any other requirements, such as surveillance assessments). Re-instated fisheries must adhere to the original improvement timeline.

Any fishery which is unable to meet the Conditions within 6 months of suspension will be fully removed from the Improver Programme. A suspended fishery not able to make the appropriate changes in the 6 month probation period due to extenuating factors (i.e. factors beyond the control of the applicants such as natural phenomenon) may apply to the Application Committee for a time extension to make these improvements. The Application Committee will have the final say on whether to grant this extension or not. Such a fishery will be eligible to re-apply via the standard IP application process not less than 1 year after the initial suspension. Such fisheries will be subjected to additional scrutiny by the initial assessment team, peer reviewer, and Application Committee, and may be required to demonstrate that they are able to meet the Conditions of their previous accepted status before they are re-admitted. Upon re-acceptance, fisheries may not receive additional time on top of the original FAP timeline.

FAP changes

Changes to the FAP may be necessary while the fishery is in the IFFO RS Improver Programme. Changes may be required to reflect new information (e.g. an improved understanding of the catch composition, new information on discarding, the results of an ecosystem analysis, or an updated understanding of stock structure); changes may also be needed to reflect components of the FAP progressing faster or more slowly than anticipated. In some cases these changes may form a planned component of the FAP, particularly in fisheries which enter the Improver Programme as data-limited fisheries.

Changes to the FAP should be made through a process of collaboration between the surveillance assessment team and the IP fishery similar to that described earlier in this document for the initial drafting of the FAP. Any changes must be highlighted in the next scheduled surveillance report and subsequently approved by both the peer reviewer and the IFFO RS IP Application Committee.



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Completed FAPs

Eventually, Improver Programme fisheries should reach the stage where they believe themselves able to meet the full IFFO RS requirements and achieve IFFO RS approval. Fisheries may determine this for themselves, from the outcomes of the surveillance reports, or obtain expert advice from the surveillance assessment team or elsewhere. Fisheries which believe themselves to meet the IFFO RS requirements must apply to the scheme via the standard application process. It is important to note that completing the FAP and IFFO RS IP process does not lead to automatic IFFO RS approval, as a full fishery assessment must be conducted by an approved Certification Body (CB). IFFO RS is an accredited certification programme, and a full fishery assessment conducted by the CB is the only route via which fishery material can enter the full scheme. A fishery successfully completing its FAP is unlikely to have been subjected to a full assessment (by any party) for a number of years, and so this final confirmation by the CB that the fishery has met the IFFO RS requirements is essential.

The maximum time that an accepted fishery may remain on the Improver Programme is 5 years. Should a fishery feel that they are unable to make sufficient improvement within the 5 years, they may appeal for an extension when this becomes apparent. In such cases, a determination will be made by the IFFO RS Improver Programme Application Committee regarding a possible extension to the timeframe and will only be granted if the fishery can demonstrate that continuous improvement has been made over the course of the FAP.

If a fishery applies for full IFFO RS approval earlier than planned but is not approved, it may re-enter the Improver Programme, either by continuing with an existing FAP or by creating a new one but may not exceed the overall timeframe of a FIP (5 years) unless this is approved by the IP Application Committee.

Quality control and appeals process

IFFO RS is committed to consistent, accurate reviews of IP fishery progress, results, and impact. The Peer Review and Application Committee processes serve as additional mechanisms to ensure the accuracy of IP fishery acceptance and surveillance decisions.

If the application/surveillance process described above is completed and the fishery or other stakeholder wishes to appeal against the approval or surveillance decision, the fishery or other stakeholder can enter into a formal appeals process to challenge the decision:

- Appeal filed with IFFO RS Secretariat. The IP fishery or other stakeholder files a notice of appeal within 30 calendar days of the IP process outcome.
- Initial review: a majority of the IFFO IP Application Committee reviews the appeal and makes a recommendation within 30 calendar days of receiving the appeal.



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- If the IFFO IP Application Committee does not agree with the appeal, the IFFO RS Governance Board will convene. Both the raiser of the appeal and a representative of the Application Committee will attend the GB meeting to present information.
- The decision of the IFFO RS Governance Board will be final.
- Decision communicated: the reviewer communicates the final decision back to the party requesting appeal. The communication will not be public, though the outcomes of the appeal decision will be made public if they affect the IP status of the fishery.



6. Glossary

GAP Analysis

A Gap analysis identifies the differences between the fishery as it is at present and the ideal end point that the fishery wishes to reach (i.e. IFFO RS approval). This then allows a Fishery Action Plan (FAP) to be produced.

Improver Programme Application Committee (IPAC)

The IPAC are a group of experts from across the fishery value chain convened by the IFFO RS Secretariat to make decisions regarding acceptance into, and retention on, the IFFO RS Improver Programme.

Fishery Action Plan (FAP)

A FAP is a schedule of improvements based on individual aspects of the fishery that require improvements and take place within a specified timeframe.

Fishery Improvement Project (FIP)

A FIP is a multi-stakeholder effort to improve the sustainability of a fishery and may vary in scope and nature. To be a credible FIP it must meet a number of requirements pertaining to participation, funding, transparency, and scientific rigor.

Peer Review

The Peer Review is an evaluation of the FIP including all necessary documentation and will be carried out by an approved Certification Body representative in accordance with specified Guidance documents.

Improver Programme (IP) Assessment

An IP assessment is a preliminary evaluation of a fishery against all performance indicators to provide a picture of the fishery's baseline environmental performance and challenges. This allows a fishery to identify any areas that need to be improved to reach a final end goal.



Annex 1

IFFO RS Fishery Improver Programme Peer Review Guidance

The purpose of the Peer Review is to ensure that the contents of an application to the IP are accurate, consistent, and supported by the evidence provided by the applicant. The Peer Review is conducted by an approved Certification Body Representative with expertise covering the IFFO RS fishery assessment process, the Improver Programme, and fisheries management in general.

The following elements shall form the basis of the IP Peer Review evaluation:

- A Review of the full GAP analysis study conducted on the fishery raw material to confirm the gaps and challenges against the IFFO RS fishery approval criteria, including the following areas:
- Ensure the fishery under assessment has been accurately characterised using the best available scientific understanding of the biological stock(s) and the catch composition.
 - Ensure the species characterisation underpinning the structure of the report is accurate and defensible, including making sure that all relevant species have been included in the assessment.
 - Confirm that throughout the report all significant statements and pass/GAP ratings are supported by adequate evidence, including references.
 - Confirm that the report as a whole has been fully completed according to the process described in the IFFO RS fishery assessment guidance.
- B Review of the applicant stakeholder committee, to ensure that it covers a balanced range of stakeholders including the industry value chain, fishery management and NGOs, in accordance with IFFO RS IP criteria. The peer reviewer shall also ensure that any organisation listed as being responsible for an Action in the Fishery Action Plan is part of the stakeholder committee.
- C Review of the Fisheries Action Plan (FAP), to ensure it has been approved by the stakeholder committee and also includes:
- An accurate representation of the GAPS identified during the GAP analysis.
 - A clear set of action(s) which could reasonably be considered to resolve these GAPS, and the timescale over which these actions are planned to occur.
 - Clear identification of the key stakeholder(s) responsible for carrying out each action. The peer reviewer should also confirm that any identified stakeholder is empowered and capable of implementing their action(s) under the circumstances of the specific fishery.



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- An outline of the timeline along which improvements will occur, including milestones indicating the expected status of the fishery after 6 months, 12 months, and then annually.
- D Overall review of all application paperwork, including the application form, to ensure consistency and completeness.



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Annex 2

IFFO RS Fishery Improver Programme Application Committee Guidelines

The purpose of the IFFO RS IP Application Committee (IPAC) is to utilise their expertise and knowledge of fisheries management and science to determine whether fisheries applying to the IFFO RS Improver Programme meet the minimum standards demanded by the IFFO RS Improver Programme. The IPAC considers the application after the peer reviewer has confirmed that the contents of all the documents are reliable, accurate and complete.

A fishery may only be accepted into the Improver Programme if the Application Committee determines that the following requirements have been met:

- 1 – Fisheries must be subject to an active Fishery Action Plan (FAP) which meets the other requirements detailed below.
- 2 – The FAP must include measurable objectives and must outline the deadlines by which the objectives will be achieved. These deadlines must be appropriate for the duration required to achieve the objectives, according to the expert opinion of the members of the IPAC.
- 3 – FAP Objectives must be based on a GAP assessment of the performance of the fishery against the IFFO RS V2 fishery assessment.
- 4 – The areas described in (3) must be covered by a full improvement timeline with long-term objectives corresponding to a status which will enable the fishery to meet the full V2 IFFO RS assessment requirements.
- 5 – The GAP assessment, FAP, and other application paperwork should, when taken together, represent evidence that the fishery is highly likely to be able to meet the requirements of a full IFFO RS fishery assessment within the timeline defined.



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Amendments Log

2017/18 *Extensive revisions for Version 2, including:*

Revision of the Pre-Assessment and Gap Analysis procedures (Section 1)

Revision of the Fishery Action Plan Development and Stakeholder agreement requirements (Sections 2 and 3)

Addition of Peer Review and IP Application Committee Process (Section 4)

Revision of surveillance and progress towards fishery approval procedures (Sections 5 and 6)