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Public Consultation Comment Responses

IFFO RS Fishery Improver Programme Application Mechanism

On the **19th September 2017** IFFO RS put forward the full draft of the proposed IFFO RS Fisheries Improver Programme (IP) Application Mechanism for a 30 day public consultation.

All comments from Stakeholders and interested parties were greatly appreciated and taken into consideration in the development of the IFFO RS IP Application Mechanism. Below is a breakdown of the comments received and the response from IFFO RS.

Comments and responses:

Stakeholder Comment	IFFO RS Response
1. Language confusion – pre assessment and full assessment. Its kind of unclear what is actually being asked for. To me the IFFO system is already a detuned MSC and detuning it further to create an IFFO PA would miss a lot of useful information. I think it may be better to ditch the term pre-assessment and stick with gap analysis.	Pre-assessment and GAP analysis are two different things according to the proposed procedures. The first is the assessment (data collection and analysis) and the GAP analysis is the summary of the gaps encountered from the pre-assessment.
2. Having fishery assessors write FAPs and then evaluate them – this is too much of a conflict of interest. An assessor can write FAPs for another fishery but not for the same one.	According to your comment, we do agree that it will be a conflict of interest, however, the evaluation of the FAP will be peer reviewed by an accredited certification body which will ensure credibility is maintained and will avoid any conflicts of interest as this accredited body will be independent from the assessors and the applicants. We will clarify this by outlining the relative role of the 'assessment team' and their separation from the actual decision-making process in the document.
3. Requirement to undergo another full assessment prior to being IFFO RS approved – I think that this will get a lot of push back especially from fisheries that have a small number of jobs to do or undertake works which are successfully signed off at surveillance audit. There should be an option for the CAB to make the call that conducting another full assessment adds very little. Now that we have moved to a pass/fail system there will be fisheries that miss out on being approved in a minor way and asking them to fork out again when	We do see your point on assessing some of the latest improvements again in a short period of time. However, the objective of IP is to get ready for application to IFFO RS. This is not the actual certification process. In addition, there will be some improvements that have been done at the very beginning that may have been updated at the time when the FIP is ending, therefore, a full assessment will be necessary. This is to follow the process according to the IFFO RS Standard certification procedures. We





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they may have fixed problems in a relatively short period of time will not win friends.	will discuss potential solutions for this issue in the future.
4. Provision to voluntarily withdraw – a fishery should be able to put things on hold if they wish. Dealing with unco-operative government agencies is the stuff of real world fisheries and being suspended will carry a tarnish which may have nothing to do with the willingness or abilities of the fishery participants. Lack of funding may also slow things down.	This is something we can implement, however, we need to be careful that the system it is not misused. If this happened, then the FIP will need to prove to the Application Committee that the reasons of stopping are due to consequences that are out of their control. In cases where the FIP stops, then recognition will also stop after a period of time maybe. The point here is that we cannot keep the recognition of that FIP for a long period of time, it must have an end.
Regarding the sentence - "The FAP and its associated deadlines must be made publicly available via the FisheryProgress.org website, and the IFFO RS website once accepted into the programme." Too limiting. The applicant should be able to put it on their own site as well. Specifying FP.org is risky if the rules change.	The applicant is more than welcome to upload all the FIP information into their respective websites. However, we mention fisheryprogress and IFFO RS because these are the main websites where the buyers of IP material will look for approved/credible FIPs. In addition, these are the websites that are recognised by the aquaculture standards.
"Overseas travel arrangements , including flights, hotels, and car rental, as required, will normally be organized by the assessment team in discussion with the applicant." Assumes that this is necessary or will all assessments be done by the existing provider? This seems unnecessary to have this in a document like this.	Agree - removed
"In either case, the score 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." Is there a score? Or a determination?	This is a determination, wording has been amended.
"The FAP and its associated deadlines must be made publicly available via the FisheryProgress.org website, and the IFFO RS website once accepted into the programme." Too limiting. The applicant should be able to put it on their own site as well. Specifying FP.org is risky if the rules change.	Agree, changed to "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.org website or equivalent, as approved by IFFO RS."
We would anticipate and hope that IFFO RS FIPs are instantly recognized by FisheryProgress.org, but this is not likely to be automatic. So this sentence on page 6 should perhaps be changed from 'and' to 'or': "The FAP and its associated deadlines must be made publicly available via the FisheryProgress.org	Agree, changed to "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



<p>website, and OR the IFFO RS website once accepted into the programme."</p>	<p>FisheryProgress.org website or equivalent, as approved by IFFO RS."</p>
<p>"In general I agreed with the document but the improvement process seems to me a bit too much ""interventionist"". For example, if something needs to be changed at the FAP, I don't think that should trigger too much movement by IFFO RS. Just an adequate justification at Fisheryprogress.org should be enough. Transparency and evidences are the ""secrets"" of a real improvement process, and that would be the main requirement along the workplan, whose advances, at the end of the day, will be audited each year, so lying would be a very bad business for applicants."</p>	<p>Agree, we have updated the FAP changes part with the following wording: "Any changes must be highlighted in the next scheduled surveillance report and subsequently approved....." Any changes will be reviewed at the next surveillance report and will not be at the point when the change was made.</p>
<p>(1) Regarding the objective of the pre-assessment and gap analysis, this should not only refer to the gap analysis of information and status, but mainly to the implementation of the "Responsible sourcing practices" section 1 of the IFFO RS, which are derived from articles 7 and 8 of the FAO Code of Conduct of Responsible Fisheries.</p>	<p>The pre-assessment and GAP analysis are to identify the deficiencies of the fishery in respect to the IFFO RS Standard. Then, the implementation of the actions to drive responsible sourcing practices will form part of the Fishery Action Plan (FAP) which constitute the full Fishery Improvement Project (FIP).</p>
<p>(2) On page 5, after the third paragraph, we suggest that a scoring procedure be established, as to determine the results of the pre-evaluation. In this scenario, the resulting scores could be compared to a standard that defines passing scores and thus more easily determine the gaps of the fishery, which will orientate the development of a Plan of Action of IP.</p>	<p>The aim of the pre-assessment is to gather information to carry out a GAP analysis. Therefore formal scoring procedures are not necessary at this stage, rather the resulting GAP analysis to compare the fishery against the IFFO RS fishery requirements is then defined a rating or score and identifies where improvements need to be made.</p>
<p>(3) In the box on page 7, reference is made to the possible existence of multiple projects in the fishery. We consider that only one IP should exist, and that this should be comprehensive, so as to leading to the IFFO RS certification once it is fully implemented.</p>	<p>Due to the differences and complexities of fisheries around the globe, in addition to the different steps required for the implementation of credible FIPs, it will be difficult and sometimes impractical to limit the number of FIPs in a given fishery. However, collaboration between these different FIPs will be a must in order for progress to take place. This will be reviewed every year during the progress tracking of the FIPs. We are developing a Collaboration Policy that will address this issue. We will also ensure that whatever is put in place has the robustness of the FIP at front and centre i.e. the main reason we want to encourage cooperation is the fact that it</p>



	improves the chances of the FIP being successful.
(4) In the same table on page 8, species are referred to. In the case of fisheries with several target species, as in the case of trawling, how is the pre-evaluation performed? Primary and secondary species are considered ?	At the moment fisheries with a small number of species can be assessed in the same way as those with one target species. In order to accommodate multispecies fisheries a targeted methodology is currently being development.
(5) For the PI approval committee mentioned on page 8, we suggest that terms of reference be developed specifying the competencies that its members should have.	The IFFO RS IP Application Committee Terms of Reference are under review and will be available on the IFFO RS website https://www.iffors.com/improver-programme-application-committee once finalised.
(6) On page 9 in "Approval Decision" it is mentioned that there are three possible results of approval: 1. Full Approval, 2. Conditional Approval, and 3. Reject. Taking into account that the Improvers Program is a commitment for the improvement of the fishery, as an interim opportunity to reach certification, we consider that the interim process of "Conditional Approval" should not exist, and that thus only two results be possible: 1. Approval and 2. Disapproval.	The inclusion of a conditional approval allows applicants to make minor changes that can be quickly, easily and effectively implemented without them needing to re-apply. This will encourage applicants to continue making improvements without incurring additional costs. A conditional approval will only be granted in certain situations as outlined in the document, will need to be met within a specific timeframe and a final decision about Approval will be made by the IPAC. The FIP with a conditional approval will not be recognised as an IFFO RS IP (will not be shown in the IFFO RS IP website) until the applicant has made all the necessary changes to obtain full approval. To make this clearer the wording has been changed to 'pending approval'.
(7) Similarly with the preceding comment, in the first paragraphs of page 12 in what corresponds to "Surveillance Determination", three results are mentioned: 1. Maintain IP Status; 2. Conditionally maintain IP Status, and 3. Suspended IP Status. We consider that the "Conditional Maintain Status" must be removed.	It is important for the credibility and robustness of the IFFO RS IP Programme to have strict rules in order to maintain recognition. However, it will be difficult to progress with the objective of this programme without some degree of flexibility given the specific and different circumstances of the applicant in this situation. The final decision will be made by the IPAC. A 'pending approval' is similar to a factory assessment - if minor nonconformities are found the factory is not automatically failed but rather given some time to correct them. This approach also gives the Application Committee more flexibility.
(8) Considering that the Improver Program is a new facility for plants, that should lead to IFFO RS certification, we consider that the longest period of	The factory should be able to improve in a relatively short time and in any case must be certified before it can produce IP material.



<p>a program should be 2 (two) years. If a fishery and plant require more than this period, then it should not be sourcing certified feed producers as part of its majoritarian proportion of marine ingredients.</p>	<p>Certain improvements in the fishery may take longer and it is assumed that more than 2 years will be necessary to implement sufficient and verifiable improvements as part of a robust and credible FIP that will be recognised in the IFFO RS IP. However, we will discuss further and investigate about the feasibility of a fair proposed improvement period.</p>
<p>we think it would be good to provide more information about this point: "The FAP and its associated deadlines must be made publicly available via the FisheryProgress.org website, and/or the IFFO RS website once accepted into the programme." We think it would be helpful to explain a little bit more about what it means to be on the FP website.</p>	<p>Given the global scope of the IFFO RS Programme and its interaction with other certification schemes we cannot be specific to a particular FIP repository. We do however see the benefit of explaining the importance of using an improvement tracker so we will expand our discussion within the document.</p>
<p>Has IFFO considered applying a maximum timeframe for fisheries to be in the IFFO RS Improvers Program? This would prevent fisheries remaining in the Improvers Program indefinitely.</p>	<p>We currently have a maximum time frame for those on the IP of 5 years. This perhaps was not made completely clear within the Application Document so a section has been added to clarify this. "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"</p>
<p>Section 2 of the document states that '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'. However, this would mean that the assessment team is providing advise to fishery, and taking on a consultant role. Furthermore, the assessment team is then included in confirmation/verification activities of the Fishery Action Plan. This could create a conflict of interest issue if the assessment team is assisting in the development of an action plan, then confirming that timeframes are plausible, actions/tasks align with objectives and there are no major red flags/risks to</p>	<p>We take the point that the terminology does make this confusing. The assessment team may be involved in the development of the FAP, however they will not be involved in any peer review or any decision of acceptance into the programme. The wording has been changed to make the distinction clearer. "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</p>



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<p>the FAP. The assessment team is then involved in the 6 month and annual surveillance assessments. The assessment team should be entirely independent from the fishery, and should not provide consultancy/advice to the fishery.</p>	<p>Governance Board for the final confirmation. "It is proposed that the 6 month and all annual surveillance assessments will also be Peer Reviewed and revised by the Application committee for the maintenance of the accepted status.</p>
<p>Section 2 states that the fishery assessment team must confirm: 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. It seems that this confirmation (verification) should be completed by the peer reviewer, especially if the assessment team have assisted in the development of the FAP.</p>	<p>As above, the recommendation for approval to the IP Application Committee will be made by the Peer Review. However, in order to clarify this, it has been proposed to change the wording "must confirm" with "must assist the applicant with the confirmation of:"</p>
<p>The document states that the application should include information on FIP Stage. FIP stages (1-5) are specifically defined by the Conservation Alliance for Seafood Solutions FIP Guidelines. Therefore, these should be used to determine the FIP stage - it is more than an indication of whether a FIP is underway and the length of FIP activity (as per IFFO's guidance). Suggest including the relevant Definitions as an Annex, or a hyperlink to Guidelines.</p>	<p>The stages we are referring to here are the IFFO RS IP Stages which have been develop following CASS guidelines.</p>
<p>Will IFFO RS IP be listed on FisheryProgress.org as Basic or Comprehensive FIPs (as per the CASS FIP Guidelines)?</p>	<p>The intention is for IFFO RS to be used as BASIC FIPs alongside MSC if the fishery is not for reduction.</p>
<p>Some of the text in the application information table (page 7) appears to have been lifted from the FisheryProgress.org guidelines (which is understandable given that IFFO RS IP seeks to align with the platform) but some of the text has been edited to fit with IFFO RS IP and as a result doesn't seem to make sense and/or doesn't seem to applicable. e.g. replacing FIP with FAP or fishery. Objectives of an IFFO RS IP would presumably be to become IFFO RS certified/approved. So the requirement for the scope of objectives to be appropriate for the fishery type doesn't make sense.</p>	<p>IFFO RS will review the wording to enhance interpretation.</p>
<p>In general the Acceptance Mechanism itself is a little unclear. For example, It would be useful to have more detail about what the Peer Review evaluation entails. Do they verify the pre-assessment, gap analysis and FAP? Does the Peer</p>	<p>A sentence has been added to clarify the process from the Peer Review to the Application Committee. "The decision made by the Peer Review will then be recommended to the IP Application Committee for a determination for</p>



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<p>Review make a recommendation to the Approvals Committee. The process is unclear. What criteria are being used by both the Peer Reviewer and Approvals Committee?</p>	<p>acceptance of the Fishery." However, Peer Review information will be included in the document to enhance transparency of the process. In addition, guidance and criteria to use for the Application Committee is under development.</p>
<p>Would fisheries only list on FisheryProgress.org should once the Applicant has received full approval?</p>	<p>IFFO RS IP and Fishery.Progress.org will have complete independence on what FIPs they recognise and list in their respective websites. Being listed in any relevant website will be a great advantage but it is not a requirement for IFFO RS IP approval. A FIP that is listed in Fisheryprogress.org may not be listed in IFFO RS IP and vice versa.</p>
<p>Is the approved assessment team (for pre-assessment, gap analysis and surveillance) associated with a CB?</p>	<p>No, the assessment team will be fully independent from the CB. The assessment team builds the file for application to IFFO RS IP. The approved CB will do the Peer Review of that file and will do the factory audit. Wording will be added to the document to make this independence more clear.</p>
<p>Clarification around possible conflict of interest with a CB being involved in peer review of IFFo RS IP and IFFO RS certification activities?</p>	<p>The CB involved in any peer review will ensure that the contents of an application to the IP are accurate, consistent, and support by evidence and will pass on their decision of acceptance into the programme to the Improver Programme Application Committee who will then pass on their recommendation of acceptance or not to the IFFO RS GB for final acceptance. The CB will have no say regarding final acceptance onto the programme. This process has been clarified in the document.</p>
<p>Suspended IP Fisheries (Page 12) "It is indicated that after the evaluation of the Action Plan, a fishery is poorly evaluated and therefore rejected, it must wait at least one year to request re-initiation." The reason for waiting 1 year is unclear, if there is new information before one year to continue the action plan, or failing, to start from scratch with a new action plan.</p>	<p>This point is regarding Fisheries that are failing to maintain approval via the lack of demonstrated consistent progress along the FAP timeline. Requiring a suspended fishery to wait 1 year before requesting re-initiation allows the applicant an appropriate amount of time to implement and demonstrate sufficient improvements.</p>
<p>I'm curious, what are the benefits of participating in the IFFO RS improvers program, other than being on the path to RS approval? Is there any potential for funding or technical capacity support? Is there a list on the IFFO RS website of FIPs that are in the IP Program? How long can a FIP be in the IP</p>	<p>We will communicate in a better way the benefits for participating in the IFFO RS IP in the document. What IFFO RS IP offers is a platform of recognised FIPs that will show their commitment to improvements in their activities for reduction which will lead to recognition in</p>



<p>program? It might make sense to flesh this kind of thing out a bit more in the intro.</p>	<p>the markets and will also provide guidelines of good practice. This may also enhance the chances for the recognised IFFO RS IP applicant to secure external investment. All of those accepted onto the Improver Programme are listed on the IFFO RS website www.iffors.com. Information regarding timescales are discussed later in the document.</p>
<p>I'd suggest that either here (Page 1, Paragraph 3) - or in a new section that follows this one - that says that in order to be eligible for the IFFO RS Improvers Program that a fishery is required to make all of these documents public, using FisheryProgress or another system (though we'd like to think that there would not be another system created that is duplicative of FisheryProgress). And that a fishery must report on it's progress regularly, or that it will be ineligible for the Improvers Program (which is consistent with the FisheryProgress guidelines).</p>	<p>IFFO RS will upload in the IFFO RS website the reports, action plans, stakeholder agreements and any other key documentation on the fishery's progress and improvements throughout the programme. Should the Fishery be using Fisheryprogress.org as an online repository for their FIP then of course they will have to comply with the progress guidelines, however our system is designed to assess all progress throughout the year in one annual assessment except in the first year where a 6 month assessment takes place.</p>
<p>Calling out FisheryProgress here (Section 2. Development of a Stakeholder-led Fishery Action Plan, Paragraph 2) feels out of place - FP requires ALL of the documentation that is mentioned in this document to be included in a FIP profile, not just the action plan. As per previous suggestion - FP should be included in the introduction or in a section about eligibility for the IFFO RS IP.</p>	<p>IFFO RS will upload in the IFFO RS website the reports, action plans, stakeholder agreements and any other key documentation on the fishery's progress and improvements throughout the programme. The number of documents considered relevant to be placed in the website will be decided by the IFFO RS IP Application Committee. In order to demonstrate our collaboration with Fisheryprogress.org we have added mutually accepted wording as a footnote in this document.</p>
<p>6. Fishery Action Plan Tracker & Surveillance Assessments: This section is a little unclear to me. From our experience with FP, I'd making it very clear who is responsible for doing what and on what timeline. For instance, who is the Surveillance Assessment team? Is that a group within IFFO RS - or if not, who participates on that team? What is the FIP required to actually do as a part of surveillance?</p>	<p>More clarity on the responsibilities of the different groups that are involved in this process and at what stage they are involved will be provided within the document.</p>
<p>If a FIP is reporting on FisheryProgress, we require 6mo action plan updates and annual indicator/action plant updates. How can we make sure that these reporting requirements are not duplicative with your surveillance? Perhaps there is some additional language that could be inserted</p>	<p>Our system is designed to assess all progress throughout the year in one annual assessment except in the first year where a 6 month assessment takes place. The information obtained from Fishery progress.org will be beneficial and will be considered for the</p>



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<p>here that states: "If a fishery is reporting in accordance with FisheryProgress.org requirements, IFFO RS will defer to that approach" or something similar.</p>	<p>applicant's FIP file for acceptance into the programme and for surveillance.</p>
<p>I also think it would be good for us to talk about reporting/surveillance. As the document reads (to me at least) right now, is that FIP implementers would have two different sets of reporting requirements if they report on FisheryProgress and are in the IP program. That seems like a lot of duplicated effort. I'd love to see us (FP and the IP) coordinate about reporting so that it's easier on the FIP implementer and more efficient for our organizations.</p>	<p>This is a good point and we are currently discussing possible ways in which we can coordinate on this.</p>