GUIDELINES FOR CERTIFICATION BODIES (CBs) MANAGING APPLICATIONS TO CERTIFICATION FOR THE IFFO RESPONSIBLE SUPPLY CERTIFICATION PROGRAMME (IFFO RS)

Introduction

This document is provided for guidance to all registered and prospective CBs to ensure that all Applicants and existing Certificate Holders of the IFFO RS Certification Programme are liaised with and handled in a professional and consistent manner.

1.0 Enquiries and Requests for Applications

All enquiries and requests for IFFO RS Certification to the CB shall initially be directed to an appropriate and trained Administrator.

Full details of the Audit including the Standard Requirements, Current Status, and Scope of Audit, Time Frame and Audit Charges, shall be discussed and agreed upon with the Applicant by an appropriately trained Staff Member who has full knowledge of the IFFO RS Certification Programme. An information pack shall be forwarded to the Potential Applicant by the CB containing:

- Application Form
- Estimated Cost
- Programme Requirements
- CB competency statement

2.0 On Receipt of an Application

Only Applications received on the current Application Form for the IFFO RS Programme shall be processed.

On receipt of an Initial Application, the Applicant's details shall be entered in a relevant database or document to show when it was received and what the planned Time Frames will be for the progression of their certification. This information can be shared with IFFO RS Board at their request.

The submission of a completed application may act as a contract between the Applicant and CB confirming the Applicant's commitment to abide by the CBs Certification Process Protocols that have been set out as part of their Accreditation Requirements to certify against the IFFO RS standard.

On receipt of a completed application form the CB's Staff shall conduct a review of the application to establish the most appropriate Audit Plan for the Applicant. Where necessary, the CB may contact the Applicant or liaise with an appropriate member of the CBs Audit Team to clarify information to assist in the preparation of the Audit Plan.

The CB shall issue this Audit Plan to the Applicant along with the invoice for the proposed audit work that will be required for Certification to the IFFO RS Certification Programme.

3.0 Arranging Audit

All Initial Audits shall be conducted at a mutually convenient date following discussion with the Applicant, taking into account the requirements of the IFFO RS Programme regarding Surveillance, Re-certification Audits, details of the Applicant, their Customers and the product in question.

All Surveillance Audits for existing Certificate Holders of the Programme should be carried out within a specific period of time after their Initial Audit, which will usually be within a 12 month time period. Any Audit that does not take place in accordance with this Surveillance Window shall be recorded and reported to IFFO RS Board with the reasons why this Audit did not occur according to the Programme's Requirements.

All Audits shall be arranged by the CB. The Audit shall be allocated to an experienced, registered Auditor for the CB who has relevant industry knowledge and expertise for the given scope of the Applicant.

Letters of confirmation shall be sent to the Applicant detailing the Audit date; time and Audit Agenda together with a controlled copy of the CB's own Certification Protocols for the IFFO RS Programme.

When Subcontracted Auditors are used, an authorisation letter/email to conduct an Audit shall be forwarded to the nominated Auditor and the Auditor's name entered in the Applicant's file. Along with this authorisation letter/email the applicant's full Audit Plan Schedule will be attached, which will highlight the date(s) and site(s) that will need to be audited by the Subcontracted Auditor.

The Subcontracted Auditor shall bring the above authorisation, where applicable, the Audit Plan and relevant Audit Report Form to the Audit Site at the agreed time and date of the Audit.

Overseas travel arrangements including flights, hotels and car hire, as required, shall be organised and agreed by the CB in consultation with the Applicant and the Auditor prior to the allotted Audit Date.

4.0 Audit Standards and Scope

Audits are to be carried out using the requirements of the IFFO RS Programme and the relevant Audit Report Checklist issued by the CB. *It is the responsibility of both the Applicant and the CB to ensure they have the most up-to-date copy of the standard as published on the IFFO RS website.*

Note: In all cases, legal requirements will take precedence over any requirements of the standard.

In the event where Additional Audit Requirements are identified e.g. checking compliance with product specifications, complaints investigation etc., the scope of the Applicant's Audit Plan can be modified. Any modification to the scope shall be subject to the agreement by IFFO RS Board but at no stage can relevant elements of the IFFO RS standard be omitted. It shall be noted that if these Additional Audit Requirements are outside the scope of CB's Accredited Inspection Activities the Audit Process of the Applicant **cannot** continue without liaison between the CB, the Accreditation Body and with IFFO RS Board.

5.0 Pre-audit Requirements

The Applicant shall be requested to submit details of the Whole Fish Fishery and By-product Fishery that are used in the process to ensure that they have an Approved Raw Material for the production of Compliant IFFO RS Marine Ingredients such as Fishmeal and Fish Oil. In addition, all Factories wishing to apply must have a valid Good Manufacturing Standard Certificate in place which complies with the International Feed Ingredient standard such FEMAS or GMP+ or benchmarked equivalent. These will be used to enable a Pre-evaluation of the operation by the registered Assessor before the planned date of the Assessment. If any are found not to be compliant, the Applicant will be informed that these prerequisites will be required if they are to be certified to the IFFO RS standard. If the Applicant Factory does not hold a valid accredited Good Manufacturing Standard Certificate, such FEMAS or GMP+ or benchmarked equivalent, the Applicant Factory must instead comply with Section 3.2 of the IFFO RS Standard 'Factories without certification to GMP+ or to an approved equivalent Standard'.

All the requirements of the IFFO RS Programme shall be reviewed by the Applicant prior to each Audit with a view to identifying actual/potential Non-conformances and initiating the appropriate corrective action. These reviews shall be part of the Applicant's own document Internal Audit Review Plan of all its policies and procedures and shall be conducted at least every 12 months.

6.0 Audit Procedures

Audis of most types of operation shall be conducted in their own language, where possible, but all reports shall be written in English.

- Applicant Size and Technical Resource
    - Production Area
    - Employees
    - Product Lines
    - Turnover
- Prior Knowledge of the Applicant to the IFFO RS Certification Programme.

The duration of the single On-site Audit shall typically be 1 day for those with GMP+ certification with a significant proportion of the time spent on reviewing Traceability Based Systems and Assessment of its practical implementation, and 2 full days for those without GMP+ certification and therefore must comply with section 3.2 of the IFFO RS Standard..

The On-site Audit Schedule shall consist of seven elements:

- An Opening Meeting.
- A review of the documented Traceability Systems back to the Approved Raw Material.
- Production Facility Inspection – to review practical implementation of the Traceability Systems and interview of specific personnel used to control these systems.
- Review of the Production Facility Inspection- to verify and conduct further document checks to verify compliance with the reviewed systems.
- Final Review of Findings - preparation for the closing meeting.
- A Closing Meeting to discuss compliance with the IFFO RS standard.
- Completion and submission of the IFFO RS certification timeline tracker to applicant and the IFFO RS secretariat.

During the Audit, detailed notes shall be made of the Applicant's ability to comply with the IFFO RS standard. These shall be used as the basis for the Audit Report. Shall a clause of the standard not be met; the Auditor shall assess the nature and significance of any Non-conformance against the standard.

There are **three** levels of Non-conformance that an Auditor can raise during an Audit:

1. Critical Non-conformance – Any non-conformity which may result in hazardous or unsafe for individuals and animals. In addition, this could also be a regulatory violation or a complete marine ingredient safety failure to implement a requirement of the IFFO RS Standard. For example; the

Auditor could provide evidence to show that the Marine Ingredients intended to be labelled as compliant were found not to have originated from an Approved Fishery of By-product for the IFFO RS programme, the Applicant shall not gain certification.

2. Major Non-conformance – Any non-conformity other than critical, which may result in failure for health or safety and which cannot be completely eliminated by re-work or reduced to a minor non-conformity. In addition, this could also be when a requirement of the IFFO RS Standard has been addressed but there is insufficient evidence to demonstrate that it has been properly controlled or implemented. For example; the Traceability System is found to be flawed to meet the requirements of Statement of Intent or any clause of the standard.

3. Minor Non-conformance – Any non-conformity which does not adversely affect the health or safety of a product. Basically, where absolute compliance to the Statement of Intent has not been met but on the basis of objective evidence the conformity of the product is not in doubt.

At the Closing Meeting, the Assessor shall present their findings and discuss and agree any Non-conformances that have been identified. The Assessor shall prepare a hand-written copy of the agreed Non-conformances, which is signed and left with the Applicant's Technical Representative. *No indication on if the Applicant has achieved Certification shall be communicated to the Applicant by the Auditor at this time.*

In the event that a Critical or Major Non-conformity is established at an existing Certificate Holder of the Programme, this Certificate Holder shall be instructed to immediately inform its customers to make them aware of the circumstances. Information on the corrective action to be taken to achieve Re-certification shall also be communicated by the Certificate Holder to its customers.

7.0 Notification of Serious Food Safety/Legality Issues

It is a requirement of many purchasers that a CB notify them immediately of serious Traceability and/or Legality issues arising out of a Supplier Inspection. In this unlikely event, the CB shall discuss with the Applicant what action is necessary to meet the wishes of the specific purchaser(s) involved.

In all cases, Reports are only distributed to Third Parties provided the owner of the Report (i.e. the Applicant) has consented in writing.

8.0 Audit Frequency

The Surveillance audits and Re-certification audits shall be conducted at the frequency defined by IFFO RS. The Audit frequency as outlined by IFFO RS shall consist of an initial factory audit (year 1) followed by 2 surveillance audits on an annual basis (years 2 and years 3).

In some cases, for example where the marine ingredient such us fishmeal or fish oil product is not produced continuously, the Re-assessment shall take place during the production of the product and verification of corrective actions in relation to Critical and Major Non-conformities shall take place within a period of time that the product is being manufactured.

The IFFO RS Certificate shall last for 3 years upon successful surveillance audit results after which period the Applicant shall re-apply for Certification to the IFFO RS Programme. Under normal circumstances Re-certification Assessments shall be arranged at least two months before the certificate anniversary or when the previous Assessment expires, and shall be carried out to allow the new certification to be completed before the current certificate date expires. *Where practicable, Re-certification of a Site shall be carried out by the same Assessor only up to a maximum of three Assessments.*

In some cases, where the marine ingredient is not produced continuously, the Re-certification audit shall take place while the factory is producing, and verification of corrective actions in relation to Critical and Major Non-conformities shall take place within a period of time that the product is being manufactured.

9.0 Initial Audit Reports

Following the audit a detailed, a typed list of non-conformances shall be issued to the applicant. After each audit a full written report shall be prepared in the correct format that has been approved by the CBs Accreditation Body and IFFO RS Board. The report shall contain an audit summary, an overview of performance, summary of non-conformances, actions taken and a detailed audit report with comprehensive details of how the applicant complies with the IFFO RS standard.

10.0 Non-conformance Follow-up

It shall be a requirement of the CB's Certification System that the Applicant writes to the CB to confirm that action has been taken with respect to all Critical, Major and Minor Non-conformances identified during the Audit. Depending upon the nature of the Non-conformance, either Documentary Evidence

or a Re-visit shall be required to fully assess compliance before a Certificate of Approval can be awarded.

The CB shall check the Applicant's file after 15 working days to evaluate the progress of the corrective actions and if necessary contact the Applicant to remind them of their obligation to provide evidence within 28 calendar days. All Non-conformances shall be closed out with 28 calendar days, unless a Request for Extension has been approved.

11.0 Distribution of Final Audi Report

The Auditor shall prepare the Final Report and submit it to the CB Programme Manager/Administrator for the IFFO RS Programme. The Final Report shall be reviewed and signed off by a technically competent and authorised Manager.

Following submission of all appropriate evidence by the Applicant, the Auditor shall review the evidence and approve its compliance before it is submitted to the Programme Manager/Administrator.

Before presentation of this Final Report to the Certification Committee, the Programme Manager/Administrator shall review the report, specifically:

- The Auditor's notes shall be reviewed to fully substantiate the Non-conformances raised in the Final Report and are to be retained and placed on the Applicant's file;
- The Auditor's Report of Non-conformance shall not be recorded as a statement of corrective action or direction;
- There shall be evidence of corrective action time frames agreed upon and authorised by the Applicant and the Auditor at the time of the inspection to close them out;
- All evidence of subsequent corrective action taken by the Applicant since the Audit shall be available, presentable and clearly identifiable.

The certification committee shall review the final report and evidence file to determine if the applicant complies with all the clauses as laid down in the IFFO RS standard.

The Certification Decision and Final Report shall be despatched to the Applicant within an agreed timescale. This shall be no longer than 3 working days after the Certification Meeting. A copy of the Audit Report and Certification Decision shall also be sent to the IFFO RS Standards Administrator and or IFFO RS secretariat with the same time period of no longer than 3 working days after the

Certification Meeting. The Head of Operations shall use these audit reports for standard consistency monitoring purposes also.

The result of an Audit shall be categorised as follows:

- Certification Achieved
- Certification not Achieved*
- Certification not Granted

* In such instances, further information shall be requested from the Applicant with a maximum of 7 days permitted for submission of the required additional evidence.

The main contact indicated in the IFFO RS application form shall be regarded as the Applicant. As such, it is this party that receives the Final Report, where applicable.

12.0 Audit Certificates

The issuance of an Audit Certificate shall be subject to the approval of the CB Senior Manager who oversees all Accredited Certification Programmes. The certificate shall be in the standard's agreed format and must detail:

- The CB name, address and accreditation details.
- A Certificate Number.
- Applicant name and site name.
- Applicant's site mailing address.
- IFFO RS standard, scope.
- Approved Raw Product categories, specific exclusions.
- Assessment date.
- Certification issue date.
- Surveillance Re-assessment required date.
- Assessment code/number.
- Applicable certification expiration date.
- Authorising signature.

The certificate shall remain the property of the CB and shall be issued subject to the Applicant complying with the CB Certification Protocols, a copy of which is provided with the Application Documentation.

The certificate should only be sent to the Applicant once all payment to IFFO RS with regards to RS standard fees has been cleared. The certificate should be sent electronically to the Applicant and IFFO RS (in order to publish it in the official website) within 1 working day of the issue of the certificate and an original copy should be arranged to be sent by post to the Applicant within 2 working days of the issue of the certificate.

In the event there are substantial changes to the premises or products, these shall be notified in writing to CB. The certificate may be withdrawn in the event changes occur, which shall affect the company's certification status.

13. Records

The CB shall review the Applicant's file 30 days after the relevant Certification Committee Meeting to ensure that all records, minutes and certificates are in place. The following records relative to Audits and Certification Decisions shall be maintained, either as hard copy or on electronic file, for a period of five years. The Applicant shall be expected to keep the following records for the same time period:

- Application form.
- Site visit confirmation letter and site visit schedule.
- Authorisation to the auditor to conduct the audit, where applicable.
- Audit report forms.
- Letter detailing non-conformance, where applicable.
- Response from applicant on corrective actions.
- Confirmation from auditor of close out of non-conformances.
- Minutes of certification meetings / reviewers comments.
- Letter notifying applicant of certification decisions.
- Typed audit report.
- Certificate and acknowledgement.

The Applicant's file shall be reviewed according to an Internal Review Programme scheduled and conducted by the CBs Internal Assessor.

AMENDMENT LOG

DATE	ISSUE	AMENDMENT	AUTHORISED BY
13/11/2015	1.1	IFFO RS logo heading, footer.	Francisco Aldon
27/11/2017	1.7	Update of wording throughout the document from "*assessment*" to "*audit*".	Francisco Aldon
27/11/2017	1.7	Deletion of "*Length of the On-site*" has been deleted from point 6.0, second paragraph	Francisco Aldon
27/11/2017	1.7	Update of all of the levels of non-conformity in section 6.0, Audit procedures	Francisco Aldon
27/11/2017	1.7	Updating of section 8.0 Audit Frequency to ensure that it is clear the frequency and length of an audit is not on a risk based term.	Francisco Aldon
27/11/2017	1.7	Rewording of "*21 working days*" to "*28 calendar days*" I section 10.0 Non-conformance follow up.	Francisco Aldon
27/11/2017	1.7	Section 11.0, fifth paragraph, rewording of paragraph to "*shall also be sent to the IFFO RS Standards Administrator and or IFFO RS secretariat with the same time period of no longer than 3 working days after the Certification Meeting. The Head of Operations shall use these audit reports for standard consistency monitoring purposes also.*"	Francisco Aldon
27/11/2017	1.7	Section 11.0, final paragraph, change from "*The applicant paying for the assessment shall be regard as the applicant*" to 'The main contact as indicated in the IFFO RS application form	Francisco Aldon

27/11/2017	1.7	Rewording of final paragraph in section 8.0 to "*In some cases, where the marine ingredient is not produced continuously, the Re-certification audit shall take place while the factory is producing*"	Francisco Aldon