Standard Setting Public System Outline Report

30th April 2019 – Independent Evaluation

Scope

IFFO RS is a business-to-business certification programme for the production of marine ingredients consisting of 3 standards; The IFFO RS Global Standard for Responsible Supply (IFFO RS), the IFFO RS Chain of Custody for Responsible Supply (IFFO RS CoC), and the IFFO RS Improvers Programme (IFFO RS IP) that assures the animal feed, food and nutraceutical value chains that marine ingredients are both responsibly sourced and responsibly produced and enables a compliant marine ingredient factory (the unit of certification) to globally to demonstrate this.

Sustainability outcomes

**Responsible Sourcing:** Sourcing raw material from responsible managed fisheries

- Whole fish used must come from fisheries that have been independently scientifically assessed and meet the key principles of the United Nations Food and Agriculture Organisation (FAO) Code of Conduct for Responsible Fisheries 1995 – the only internationally recognised measure of good fisheries management.
- Assessors will be looking for science-based requirements to protect stocks, habitats and the wider environment, such as: stock assessments; precautionary approach with formal reference points; overall management, legislation and enforcement of the fishery.
- Any fish by-products must come from fish that were intended for human consumption and must not have originated from a fishery or species that is considered endangered by the International Union for Conservation of Nature (IUCN) as published in their Red List (www.iucn.org)
- Illegal, unreported and unregulated (IUU) fish and any resulting by-products are excluded in accordance with EU Regulation and the International Plan of Action to eliminate IUU.

**Responsible Production:** Good manufacturing practice for safe and traceable product

- The factory must have implemented must have either attained Certification to the International Feed Safety Alliance (IFSA) or equivalent, as proof of responsible or have a robust (HACCP based) GMP (Good Manufacturing Practices) in place as proof of responsible manufacturing.
- The applicant shall be in possession of all the relevant permits and licenses for the production and sale of fishmeal and fish oil products.
- Applicants must comply with the social and environmental criteria in order to make these more evidence based when demonstrating social and environmental responsibility.

**Responsible Traceability:** Of marine ingredients back to fisheries that are compliant with this Standard.
The factory must have the ability to identify the source of all raw material and to segregate material from compliant and non-compliant fisheries thereby ensuring that only compliant raw material is used in the production of IFFO RS marine ingredients.

Why is it needed (justification)

The continued development of the global marine ingredients markets has resulted in the need for the industry to demonstrate its commitment to the responsible sourcing of raw materials and the safe production of ingredients for aquaculture, agriculture and directly in the production of consumer products.

With concerns over the sustainability of global fisheries and the fight against Illegal, Unreported and Unregulated Fishing (IUU) a key issue, the IFFO RS Governance Board has provided a platform to allow stakeholders to be able to better demonstrate their commitment to responsible sourcing and production of raw materials in the form of a Global Standard and Certification Programme for the Responsible Supply of Marine ingredients. The IFFO RS certification provides the means by which compliant IFFO RS certified factories may attain independent assurance that they have policies and procedures in place which conform to internationally recognised raw material sourcing and processing Best Practice. IFFO RS certificate holders can signify their compliance with the IFFO RS standard, procedures and practices with our unique Certification Logo – “IFFO RS Assured”.

After much development, the initial Standard was finalised and the programme opened for applications in October 2009 with the first factory becoming IFFO RS certified in February 2010. Later in 2012, IFFO RS achieved the International Organisation for Standardisation ISO Guide 65:1996 (EN45011), (now ISO/IEC 17065:2012) accreditation through its independent Certification Body. The third party certification bodies that have been approved by IFFO RS ensure the credibility, transparency and integrity of the IFFO RS standard.

Since its launch, the standard continued to grow from strength to strength and is now the leading standard in the certification of marine ingredient producing factories. The requirements for Certification of Responsible Supply are subject to regular review and improvement to ensure that it continues to serve IFFO RS stakeholders needs in the provision of safe, responsibly sourced marine ingredients for the International market. After 5 years since the launch of its factory standard, the IFFO RS Governing Body Committee via its Technical Advisory Committee undertook a revision of the IFFO RS standard launching Version 2.0 in July 2017 in order to maintain, not only relevance but creditability and accessibility for all.

The IFFO RS Version 2.0 standard includes clauses on Good Manufacturing Practices, relevant to the production of marine ingredients, together with revised and new clauses in the social and environmental sections. There is also a new community engagement section. There have been a number of changes to the fisheries assessment part of the standard, to reflect the latest thinking in fisheries management, including the assessment of mixed fisheries within a single report. A transition period was put in place and all IFFO RS Certified factories and IFFO RS approved whole fish and by-products will be certified/approved under V2.0 by the close of 2019.

Performance Level

IFFO RS secretariat is committed to providing and facilitating a cost effective and practical assessment and certification process through which all sizes of marine ingredient producers can demonstrate their commitment to responsible sourcing practices, and has an implemented Quality Management System (QMS) described in this document in order to achieve the following objectives:
To work in partnership with CBs and applicants to provide for their needs and enhance their expectations to enable them to meet the requirements of the IFFO RS programme;

To maintain a participatory work ethic, to properly apply the innate excellence of staff, and to provide a culture in which they excel;

To maintain a commitment for continuous improvement and apply this commitment improve assessment and certification processes and training-related services;

To facilitate and maintain ISO 17065 accreditation for the IFFO RS Programme;

To provide open, effective communication with customers, interested parties and committees;

To provide open, effective communication with all stakeholders directly and indirectly involved in the IFFO RS programme on any changes/revisions to the standard and certification process in an effective manner.

To provide systematic validation and control of quality processes.

The IFFO RS programme is not a mandatory scheme and there is no requirement for marine ingredient producers to be certified in order to access any markets.

The IFFO RS programme supports the enhancement of factory standards in order to continually improve their operations.

IFFO RS Standard V1.6 included some environmental and social aspects, however, Version 2.0 of IFFO RS V2.0 has further developed and expanded into this area with the following sections:

- **Section 5**: Social Accountability
- **Section 6**: Environmental Accountability
- **Section 7**: Community Engagement

Some of the key development activities for IFFO RS V2.0 included re-developing the IFFO RS Approval Criteria for raw material fisheries whilst continuing to incorporate the key elements of the FAO Code of Conduct for Responsible Fisheries 1995 and more recent FAO guidance document, as well as incorporating the 2014 Asia-Pacific Fishery Commission (APFIC) publication “Regional guidelines for the management of tropical trawl fisheries in Asia” to enhance the robustness of the single fishery approval methodology. In addition, Version 2.0 of the IFFO RS standard developed an additional set of IFFO RS Approval Criteria for raw material fisheries defined as mixed fisheries to determine how they can be reviewed and assessed for used as raw materials for fishmeal and fish oil production. Version 2.0 of the standard also includes relevant Good Manufacturing Practice clauses in order to increase the accessibility of the standard to those that do not have the IFIS or equivalent certification in place but can demonstrate Good Manufacturing Practices.

**Adaptations**
To promote the co-existence and mutual recognition of existing accredited National, and International programmes for the assurance of feed materials, the IFFO RS Standard will recognise certification programmes that have demonstrated credible accreditation credentials as long as they can provide equivalence to the IFFO RS requirements in the areas of raw material fishery certification and/or good manufacturing practice certifications.

For Good Manufacturing Practices applicants with valid third party certificates from an IFSA recognised member National or International GMP and Certification Program will gain recognition to the IFFO RS Requirements for Responsible Supply. The IFFO RS Standard also recognises FEMAS as an alternative equivalent to GMP+.

For approval of raw material the IFFO RS programme will promote the co-existence and mutual recognition of independent fishery certifications, and will recognise fisheries that are certified to the Marine Stewardship Council’s Principles and Criteria for Sustainable Fisheries only as compliant with the fishery section of the standard.

IFFO RS is in the process of finalising the Recognition Procedure for the formalisation of the recognition of GMP+, FEMAS and MSC Certification. Records of the assessment of the standards recognised as either fully or partially equivalent as well as records of stakeholder consultation and the process of approving the standard as equivalent as partially of fully equivalent will be made available to ISEAL and published on the IFFO RS Website.

Although the official language of the IFFO RS standard is English, to assist in promoting global recognition in the largest produces and users of raw marine ingredients the IFFO RS Standard will be available in Spanish and is currently undergoing language quality checks and most of the information in the IFFO RS website is available in Spanish and Chinese.

Finally the IFFO RS Certification Programme has also developed the IFFO RS Improvers Programme to support fisheries and factories that do not have the mechanism in place to achieve IFFO RS certification. IFFO RS will be used as a great tool that will develop a structured improvement journey that will enable them to comply in a specified period of time. Development of risk-based assessment components reflects adaptation towards small-scale/data-limited fisheries.

**Standard Setting and Revision Process**

In 2007, the IFFO Governing Body Committee decided to address the value chain’s need for reassurance on the origin and purity of the raw materials going into marine ingredients. In order to better demonstrate to all stakeholders the commitment of IFFO’s members to responsible practices in the areas of raw material procurement, feed/food safety and traceability, a multi-stakeholder Technical Advisory Committee (TAC) was convened to develop a Global Standard for the Responsible Supply (IFFO RS) of fishmeal and fish oil.

The TAC agreed that the standard should be a business-to-business standard that took fishmeal and fish oil factories as its unit of certification. It was also agreed that the new standard should be managed according to ISO guide 65 accreditation (Now ISO 17065) requirements for the consistent certification of a product, process or service, which required the appointment of a totally independent third party Certification Body which could undertake all raw material assessment and the auditing and awarding of IFFO RS conformance certificates to compliant factories.

The initial IFFO RS Standard was finalised in September 2009, the programme opened for applications in October 2009, and the first factory was certified in February 2010.
Stakeholder Categorisation and Geography

The IFFO RS Standard is a Global Standard of which the stakeholder group is comprised of marine ingredient producers, traders, fish feed producers, fish farmers, fish processors, fish oil processors, retailers, Marine conservation NGOs, other standard setters and experts in certification together with independent fishery scientists, all these stakeholders are from different parts around the world such as South America, Europe and Asia.

The companies and their respective sectors that participated in the development of the IFFO RS Standard are:

Governance Body Committee Members:

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<tr>
<th>Directors</th>
<th>Representation</th>
<th>Country</th>
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<tr>
<td>Andrew Jackson (AJ)</td>
<td>RS Board chairperson</td>
<td>UK</td>
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<tr>
<td>Neil Auctherlonie</td>
<td>IFFO Representative</td>
<td>UK</td>
</tr>
<tr>
<td>Humberto Speziani (HS)</td>
<td>Fishmeal producer</td>
<td>Peru</td>
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<tr>
<td>Frank Tearty (FT)</td>
<td>Fishmeal Producer</td>
<td>Ireland</td>
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<tr>
<td>Daniel Lee (DL)</td>
<td>Standard Holder</td>
<td>UK</td>
</tr>
<tr>
<td>Eduardo Goycoolea</td>
<td>IFFO Board Representative</td>
<td>Chile</td>
</tr>
<tr>
<td>Estelle Brennan</td>
<td>Fish Processor</td>
<td>UK / Southeast Asia</td>
</tr>
<tr>
<td>Michael Lutz (ML)</td>
<td>Trader</td>
<td>Germany</td>
</tr>
<tr>
<td>David Parker (DPa)</td>
<td>Fish Processor</td>
<td>UK</td>
</tr>
<tr>
<td>Niels Alsted (NA)</td>
<td>Feed producer</td>
<td>Denmark</td>
</tr>
<tr>
<td>Ally Dingwall (AD)</td>
<td>Retailer</td>
<td>UK</td>
</tr>
<tr>
<td>Duncan Leadbitter (DLb)</td>
<td>Fisheries expert</td>
<td>Australia</td>
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<tr>
<td>Piers Hart (PH)</td>
<td>ENGO</td>
<td>UK</td>
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<tr>
<td>Ernesto Godelman</td>
<td>ENGO</td>
<td>Argentina</td>
</tr>
<tr>
<td>Michiel Fransen</td>
<td>Standard Holder</td>
<td>Netherlands</td>
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Technical Advisory Committee (TAC) Members:

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### Summary of the Revision Process

The IFFO RS programme, including the standard and certification process, is subject to an annual review process and a full revision process of the IFFO RS standard every 5 years to ensure it remains relevant, accurate and optimised. The review/revision outcomes include a list of findings, cause analysis, and preventive and corrective actions with deadlines and responsibilities, as applicable. The preventative and corrective actions can result in the review/revision of operating procedures or the standard itself.

The management review is fully documented and carried out with the involvement of directly affected stakeholders and other interested parties, and addresses any issues of concern raised by such. There are opportunities for stakeholders to engage via comments submitted directly to IFFO RS or CBs, or during open public comment periods.

This review/revision is discussed at all IFFO RS Governance Board meetings to determine if any actions relating to the standard content or certification requirements are required in any subsequent issues and versions of the IFFO RS standard.

The IFFO RS Secretariat attends various trade conferences around the world and actively participates in different meetings with stakeholder groups ranging from governmental to non-governmental entities in order to ensure an effective identification of key stakeholders that can be consulted for further improvements and to give information on what the IFFO RS certification programme does and does not aim to improve.
Governance

The multi-stakeholder Governance Board which sets and develops the standard comprises marine ingredient producers (IFFO member producers), traders, fish feed producers, fish farmers, fish processors, retailers, Marine conservation NGOs, other standard setters and experts in certification and standards.

Please find below and illustrative diagram of the governance structure of FFO RS.
Decision-making Process

The SSC is appointed by the IFFO RS secretariat on behalf of the (Technical Advisory Committee (TAC). Membership will be based on advice, consultation and nominations put forward from the Marine Ingredient Industry, Governance Board, and identified stakeholders associated directly or indirectly with the IFFO RS Certification Programme.

The SSC will be composed of at least 4 members plus a Chair. The membership of the SSC will be comprised of sufficient competency of broad policy/management and shall include; Marine Ingredient Producer, Marine Ingredient Processor, Standard Holder, and representatives from the Supply Chain for Marine Ingredient Products such as; Retailers, Traders, Fish Feed Producer, Fish Farmers and other related standards. It is not a requirement to appoint all members of the SSC from the outset.

The SSC’s representation will be adapted from time to time to ensure it continues to represent the interests of the marine ingredient regions and areas of broader certification interest. This review will be conducted every 12 months by the Secretariat in consultation with the existing SSC members.

The SSC’s Chair will be elected by the SSC and will be non-voting. The Chair will only cast a deciding vote in the event that a tied vote is cast by the members of the SSC. The Chair shall have a term of 12 months. After this term the SSC will have the opportunity to re-elect or choose another Chair. As standard owner, IFFO RS will act as the Secretariat to this SSC.

The Technical Advisory Committee (TAC) is appointed by the IFFO RS secretariat on behalf of the IFFO RS Governing Body Committee (GBC). Participation will be based on advice, consultation and nominations put forward from the Marine Ingredient Industry, Governance Board, and identified stakeholders associated directly or indirectly with the IFFO RS Certification Programme.

The Committee is to be composed of up to 10 voting members plus a Chair. It is not a requirement to appoint all members of the committee from the outset. The Committee’s Chair will be elected by the appointed members of the Committee and will be non-voting. The Chair will only cast a deciding vote in the event that a tied vote is cast by the members of the committee. The Chair shall have a term of 12 months. After this term the Committee will have the opportunity to re-elect or choose another Chair. As standard owner, IFFO RS will act as the Secretariat to this Technical Advisory Committee.

The membership of the Committee will include sufficient representation and competency of broad policy/management: fishery, ethical and social, environmental science and operational aspects of marine ingredient industry.

The Committee’s representation will be adapted from time to time to ensure it continues to represent the interests of the marine ingredient regions and areas of broader certification interest. This review will be conducted every 12 months by the Secretariat in consultation with the existing Committee members.

A Quorum at such meetings shall consist of not less than five (5) of the voting members of the Committee and shall be representative of the value chain.
Each member shall have one (1) vote. The Chair or person presiding shall in the event of an equal division have a second casting vote.

The IFFO RS Ltd Board of Directors establishes a committee known as the Appointments Committee to be responsible for certain appointments and nominations to the Governing Body Committee and other committees, including the selection and appointment of the chair of the Governing Body Committee.

The Governing Body Committee is to be composed of up to (15) members in total and a Chair. The committee chair will be elected by the Governing Body Committee and will be non-voting. The Chair will only cast a deciding vote in the event that a tied vote is cast by the members of the committee. The Chair of the Governing Body Committee shall be appointed for a period of three (3) years, he/she may be dismissed with three (3) months’ notice from the GBC by resolution of the GBC.

The membership of the Governing Body Committee will include sufficient representation and competency of broad policy/management: fishery, ethical and social, environmental science and operational aspects of marine ingredient industry.

A quorum at such meetings shall consist of no less than eight (7) members and must always include at least one (1) NGO representative.

Each member shall have one (1) vote, observers of the GBC may not have a vote. The Chair of the GB does not vote on normal resolutions. In the case of a tied vote the Chairman shall be entitled to a Casting Vote.

Review and Revision Process

Complaints about the general Integrity of Compliant IFFO RS Products

The responsibility for complying with the requirements of a Certification Programme as defined in the IFFO RS Standard, and for complying with statutory requirements, rests absolutely with Clients. Therefore, any complaint about a product, or possible infringements of the law, shall be dealt with by the Client. Complaints of this nature coming directly to the CB or IFFO RS Secretariat will be referred to the CB concerned for appropriate action to be taken. Clients are required to maintain a record of all such complaints and the subsequent action taken, and to make these records available for examination when continuing assessment visits are carried out.

Complaints about misuse of the IFFO RS Logo

Written complaints concerning the misuse of the IFFO RS logo will be managed by the IFFO RS Secretariat on behalf of the IFFO RS GB. Details of the complaint and products will be recorded including the product, the species, the associated organisation and the region. The IFFO RS Secretariat will complete a trace back to the relevant organisation and Certification Body and direct the Certification Body to conduct an investigation and report on the extent of the issue. A breach in the terms of the Use of the IFFO RS Logo may lead to a product recall. The Certification Body also conducts check of the use of the IFFO RS Logo as a matter of practice as indicated under the ISO17065 guide.

Complaints about Certification Programme Operation
Written complaints concerning the operation of the IFFO RS Programme will be dealt by the IFFO RS Director, who will be responsible for acknowledgement and investigation of the complaint. The Director will also be responsible for seeking and managing resolution of the complaint.

Any Complaint will be flagged to the IFFO RS Director and the IFFO RS GB will be kept informed of any corrective actions until the complaint has been resolved.

A complaints register will be maintained and will be made available for internal and third party system audits.