PUBLIC SYSTEM REPORT – ASSURANCE CODE V.1

Updated July 2018

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Introduction

ASC was founded in 2010. In the same year it received standards developed by the Aquaculture Dialogues facilitated by the World Widelife Fund (WWF). However, to make the standards certifiable, a system was needed to qualify auditors who can offer certification services to farms. As the result of that, the first farm got certified in mid 2012.

A lot of feedback from stakeholders, especially the Conformity Assessment Bodies (CABs) on the system was received. The practical feedback together with the self-assessment (2014) and peer review (2015) against the ISEAL Assurance Code served as inputs for the system revision. At the end of 2015 the revised system was launched and it became mandatory from 2017 onwards.

A couple of important highlights of the ASC's assurance system since peer review in 2015:

- First time 2-full day session was held by the ASC together with the CABs and the accreditation body (ASI) whereby parties could update and share concerns with one another. This format of calibration was highly appreciated by participants and will likely take place again in 2017.
- The content-related check (QA L2) of 100% draft audit reports is implemented alongside with the completeness check (QA L1) that was started in July 2015. Initial positive feedback has been received from both parties, reviewers as well as reviewees'.
- There was the first time a CAB suspended due to poor performance.
- First time implementation of trace backs based on fraudulence reports from the supply chain.
- First time ASC joined an ASI's witness audit, whereby it can observe performance of both ASI's assessor and CAB's auditors.
- The ASC's work streams on Multi-site and Group certification are going well and it is likely that the approaches will be ready for launch later this year.

- ASC formed a new team called Programme Assurance team
- Areas of work of the PA were defined collaboratively
- Objectives of the team were created: 1. Establish and maintain a better ASC assurance system that is transparent, impartial, consistent, competent, rigorous and accessible maintained and continuously improved so the confidence and trust of standard users and stakeholders in Assurance programme is created and maintained
- The desired outputs of the team were stipulated also in the light of Compliance/ alignment with international guidelines/ best practices (ISEAL, GSSI, etc.) and the risk of not achieving an output was specified
- An internal risk assessment was carried out beginning of 2018 (evidence is submitted to ISEAL: 29_PAT risk assessment)
- A designated space for the work of the PA team on the website was created: https://www.asc-aqua.org/what-we-do/programme-assurance/

Assurance System Structure

As the scheme owner, the ASC develops and manages its standards (Table 1) as well as a framework for the standards to be materialised. This framework (the ACS Certification and Accreditation Requirements - CAR) includes audit manuals (each for every standard) for use by auditors and audit preparation checklists for use by clients seeking for ASC certification.

Table 1: Standards managed by the ASC

#	Standards	Status
	Abalone	Standard was developed by an Aquaculture Dialogue (AD). There are certified farms
	Bivalves (oysters, mussels, clams, scallops)	Standard was developed by an AD. There are certified farms
	Fresh water trout	Standard was developed by an AD. There are certified farms
	Pangasius	Standard was developed by an AD. There are certified but also cancelled farms
	Tilapia	Standard was developed by an AD. There are certified but also cancelled farms
	Salmon	Standard was developed by an AD. There are certified but also cancelled farms
	Shrimp	Standard was developed by an AD. There are certified farms but also cancelled farms
	Seriola/Cobia	Standard was developed by an AD. Standard is ready, audit manual is finalised There are certified farms
	Aquafeed	First standard being developed by the ASC – second public consultation is over, projected release is fourth quarter of 2018

The ASC works with an independent accreditation body and third-party conformity assessment bodies (CABs). It has appointed ASI (Accreditation Services International GmbH) to act as its exclusive accreditation body to administer the assurance component of the system.

ASI uses the CAR, including ISO 17065, to assess and accredit CABs that wish to be conducting audits to any of the ASC standards. All accreditation decisions are taken by ASI. ASI's accreditation services must comply with

ISO 17011 and relevant requirements of the ISEAL Assurance Code. ASI maintains an up-to-date list of accredited CABs with their respective scope of accreditation (per aquaculture species and geographical locations)[1].

Accredited CABs audit and certify aquaculture farms and processing facilities against ASC farm standards and MSC/ASC Chain of Custody (CoC) requirements. CABs are responsible for taking certification decisions.

Stakeholders are offered opportunities to engage in both ASC certification and accreditation processes. Prior to any actual audit and assessment at a farm or CAB, an announcement is published on ASC and ASI websites respectively. This allows for stakeholders to send their input and share their concerns about that particular farm or CAB. For farm audits, CABs must notify relevant stakeholders of the planned audit and invite them to participate in it. Farm draft audit reports are published on the ASC website for further comments and only after that public comment period, the certification decision will be taken.

Complaints and appeals are handled separately by the respective actors depending on the nature of the complaint. If it is about certification services and decisions, CABs take the lead; if it is about accreditation services and decisions, the process is with ASI, and so is with the ASC when it comes to ASC's activities. However, if a complaint to the CAB is not satisfactorily resolved, it will escalate to ASI and then to ASC if also not resolved at the ASI level.

At the ASC level, the Supervisor Board has the ultimate decision-making power, including final approval of the framework (CAR) and decisions on complaints and appeals based on recommendation of the respective Technical Advisory Group (TAG) and Complaints Panel.

Personnel Competence

For auditors to be approved for ASC audits, they must participate in ASC training and successfully pass a final examination. Qualifications and competencies requirements[2] for auditors are very comprehensive. They are divided into three major groups:

- for all auditors (lead, social, and auditor) as well as technical experts;
- for lead auditors only; and
- for social auditors.

The ASC requires that CABs must have documented procedures in place to make sure that their auditors are always competent for ASC audits. Those cover, inter alia, regular calibrations and annual review/evaluation of competence of key personnel. On top of that, the ASI accreditation procedures include witness and compliance assessments to verify competence of CABs.

ASC has also come to the conclusion and consequently decision that yearly tripartite calibration workshop must be held with participation of CABs and ASI is necessary as a means to improve audit quality and consistency. First such a meeting held in February 2015, which lasted only a couple of hours. However, the one held in February 2016 was 2-full day, in 2017 as well as in February 2018 calibration meetings were held.

At the same time, ASC started to revived the regular (every three months) calls/webinars with CABs aiming at updating and clarifying concerns/questions that each party has. This regular call seems to be very much appreciated by all sides.

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[1] List of CABs for ASC: http://www.accreditation-services.com/archives/standards/asc

[2] CAR v.2.0 – Annex B: http://www.asc-aqua.org/upload/ASC%20Certification%20and%20Accreditation%20Requirements%20V.%202_clean_08122015_17.6.9.pdf

Another way to achieve that objective is to make ASC requirements (in terms of both standards and CAR) clearer allowing for less diverse interpretation.

There are currently ten CABs accredited for ASC farm certification with around 23 approved auditors (lead, social and technical experts). These modest numbers of auditors and CABs may pose a challenge to coping with the rapid growth of certified farms, especially in new origins (e.g. Madagascar recently).

Assessment

Farm audits include both desk and on-site visits. On-site audit applies to all stages of the certification cycle, initial, surveillance and re-certification. If deemed necessary, on-site audit may take place for closeout of major non-conformities, change of certification scope, or for certificate transfer.

Surveillance audits are annual and there must be at least two surveillance audits within the 3-year certificate validity. While stakeholder consultation is a must for initial and re-certification audits, it may take place during surveillance one when social aspects are to be checked.

To maintain impartiality, ASC requires CABs to comply with ISO 17065, particularly in terms of separating different functions (auditing vs. consulting) and does not encourage auditors share knowledge with farmers during the audit process. However, as mentioned in the ISO 17065 (4.2.6 Note 1), "this does not preclude the possibility of exchange of information" between the CABs and their clients.

An audit may be carried out by one lead auditor or by a team of auditors as long as the required qualifications and competencies are present for the audit. An audit team must have an ASC lead auditor. Certification decisions are taken by the CABs' decision-making entity that is not involved in the audits. No certificate is granted if there are outstanding major (e.g. breakdown/failure of the system and/or repeated minor non-conformities, etc.). During the surveillance audit, if a major non-conformity is found and not closed within maximum six months, the certificate will be suspended.

Minor non-conformity is raised when an ASC requirement is not met but it does not jeopardise the integrity of the certified product. It does affect the certification decision and has to be closed out within three months.

Multi-site (mainly for larger companies with multiple sites) and Group certification (mainly for smaller producers organised in a group) approaches are in the making. Both have gone through public consultation process. There were 7 groups piloting the Group certification approach in various countries. Feedback from the pilots is nearly complete and the next version is being revised at the moment. It is expected that both approaches will be ready for launch by the end of this year.

Oversight

The ASC works with ASI as its exclusive accreditation body. ASC requires that ASI must comply with ISO 17011. ASI is also an ISEAL member; it complies with ISEAL credibility principles and relevant requirements of the ISEAL Assurance Code in addition to ISO 17011. ASC and ASI agreed to use ASI's accreditation procedures to oversee CABs' compliance with the ASC's CAR and ISO 17065.

The initial assessment phase includes (head) office assessment, assessment of all or a sample (depending on a number of factors) of CABs branches, and one witness assessment per technical scope.

Surveillance assessments are annual, which includes four primary assessment activities: office assessment, witness, compliance and document review/desk studies. The first surveillance office assessment must take place within six months from the moment when accreditation was granted. ASI applies a sampling rate to define the sample number, sample selection as well as sample duration for each surveillance assessment.

At the moment ASI has its risk score up for public consultation. Once that is finalised, the risk score will be used for determining the sample size and selecting samples for their assessments.

Re-accreditation assessment takes place every five years and covers office assessment as well as assessment of branches that have not been visited within the 5-year period of accreditation cycle.

On-going Scrutiny

The ASC's Chain of Custody (CoC) and logo licencing are fully administered by the MSC, who runs DNA testing and tracebacks as part of its supply chain integrity.

Recently, based on feedback from the supply chain, ASC/MSC has carried out a tracebacks investigation for some of the ASC certified products. The tracebacks results have been shared with the respective CAB for their actions.

Tips or complaints about misuse of the ASC logo are to be reported to the MSC for consideration and investigation as needed.