

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 Assessment including the Standard Requirements, Current Status, and Scope of Assessment, Time Frame and Assessment 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.

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

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

3.0 Arranging Assessments

All Initial Assessments 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-assessments, details of the Applicant, their Customers and the product in question.

All Re-assessments for existing Certificate Holders of the Programme should be assessed within a specific period of time after their Initial Assessment, which will usually be within a 12 month time period. Any Assessment 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 Assessment did not occur according to the Programme's Requirements.

All Assessments shall be arranged by the CB. The Assessment shall be allocated to an experienced, registered Assessor 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 Inspection date; time and Inspection 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 Assessment 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 Assessment Plan Schedule will be attached, which will highlight the date(s) and site(s) that will need to be assessed by the Subcontracted Auditor.

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

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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 Assessor prior to the allotted Assessment Date.

4.0 Assessment Standards and Scope

Inspections are to be carried out using the requirements of the IFFO RS Programme and the relevant Assessment 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 Inspection Requirements are identified e.g. checking compliance with product specifications, complaints investigation etc., the scope of the Applicant’s Assessment 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 Inspection Requirements are outside the scope of CB’s Accredited Inspection Activities the Assessment Process of the Applicant **cannot** continue without liaison between the CB, the Accreditation Body and with IFFO RS Board.

5.0 Pre-assessment 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.

All the requirements of the IFFO RS Programme shall be reviewed by the Applicant prior to each Assessment 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 Assessment Procedures

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Assessments of most types of operation shall be conducted in their own language, where possible, but all reports shall be written in English. The length of the On-site Assessment shall be determined by the CB from a detailed Risk Assessment that will incorporate a number of factors gathered from the Applicant’s application form.

- 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 Assessment shall typically be 1 day with a significant proportion of the time spent on reviewing Traceability Based Systems and Assessment of its practical implementation.

The On-site assessment Schedule shall consist of six 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.

During the Assessment, 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 Assessment Report. Shall a clause of the standard not be met; the Assessor 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 Assessment:

1. Critical Non-conformance– Where a Critical Non-conformity against the principals of the IFFO RS standard has been established at an Initial Assessment e.g. the Auditor could provide clear evidence to show that the marine ingredient like fishmeal and/or fish oil intended to be labelled as

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assured was found not to have originated from an Approved Fishery or By-product to the IFFO RS Programme, the Applicant shall not gain Certification.

Where a Critical Non-conformity is found at a Re-assessment of an existing Certificate Holders of the Programme, certification shall be immediately suspended. In both instances there shall be the need for a Full Re-evaluation to demonstrate compliance to the IFFO RS standard.

2. Major Non-conformance– Where there is a substantial failure e.g. the Traceability System is found to be flawed, to meet the requirements of statement of intent or any clause of the standard. Certification shall not be issued until the Non-conformances are actioned.

3. Minor Non-conformance – 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. Certification shall not be issued until the Minor Non-conformances are closed out.

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 Risk Assessment and Assessment Frequency

The Surveillance Re-assessments shall be conducted at the frequency defined by IFFO RS. The Assessment frequency is based upon the inherent Product/Process Risk and the result of the Initial Assessment.

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In some cases, for example where the marine ingredient such as 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 lasts for 3 years and after that period the Applicant will need to 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.*

9.0 Initial Assessment Reports

Following the assessment a detailed, typed list of non-conformances shall be issued to the applicant. After each assessment 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 assessment summary, an overview of performance, summary of non-conformances, actions taken and a detailed assessment 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 Assessment. 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 21 working days. All Non-conformances shall be closed out with 21 working days, unless a Request for Extension has been approved.

11.0 Distribution of Final Assessment Report

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The Assessor 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 Assessor 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 Assessor’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 Assessor’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 Assessor at the time of the inspection to close them out;
- All evidence of subsequent corrective action taken by the Applicant since the Assessment 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 Assessment Report and Certification Decision shall also be sent to the IFFO RS Head of Operations for standard consistency monitoring purposes with the same time period of no longer than 3 working days after the Certification Meeting.

The result of an Assessment 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 Applicant paying for the Assessment shall be regarded as the Applicant. As such, it is this party that receives the Final Report, where applicable.

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12.0 Assessment Certificates

The issuance of an Assessment 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 1working 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 Assessments 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:

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

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