CONDUCTING IFFO RS FACTORY/SITE AUDITS BY APPROVED CERTIFICATION BODIES (CBs)

PURPOSE

The contents of this document are to ensure that all IFFO RS Factory/Site Audits are conducted and reported in a consistent manner.

SCOPE

This document states the procedure to be applied to all IFFO RS Factory/Site Audits carried out by all approved CBs

1. METHOD

1.1 Pre-audit Process

The CBs Programme Manager/Administrator will be responsible for conducting the Pre-audit Check by contacting the Applicant directly. The Programme Manager/Administrator will contact the Applicant by telephone/email and confirm that they are in a position to proceed to Initial Audit by ensuring that they are:

- In possession of all the relevant Standard Documentation;
- Aware of and understand the Standard Requirements;
- Aware that the signed Application Form acts as a contract between the CB and the Applicant;
- Able to demonstrate compliance with the requirements of the IFFO RS standard during the Audit Visit;
- Able to provide the allocated Auditor the necessary access to all areas required to be reviewed on the agreed Audit Date.

The Programme Manager/Administrator may take the opportunity during this Pre-audit Check to explain and agree additional interpretation requirements of the standard with the Applicant.

If deemed necessary, the relevant Programme Manager/Administrator may request the allocated Auditor to carry out this Pre-audit Check.

If the Pre-audit Check is successful, the Audit Date along with a Site Audit Schedule, (developed in conjunction with the Auditor if applicable), will be confirmed in writing to the Applicant. IFFO RS secretariat/Standards Administrator from each IFFO RS approved Certification Body will receive a monthly Certification Tracker indicating the audit schedule.

If the outcome of the Pre-audit Check is unsatisfactory this information will be entered in the Applicant's file by the Programme Manager/Administrator and the Programme Manager will re-contact the Applicant at an agreed time to reset the date of the Audit.

The pre-audit process for audits subsequent to the initial audit - termed here as "Re-audits" - does not include a Pre-Audit Check. The Programme Manager /Administrator will be responsible for scheduling Audits and notifying the registered Auditor. Where relevant, this Schedule may be amended as necessary to take into account changes in the Audit Frequency required by any amendments to the IFFO RS standard. The Auditor will be responsible for the carrying out of the Audit on the agreed date. Where an Audit cannot be conducted on the agreed date the Programme Manager/Administrator shall ensure that the Audit is not re-scheduled outside its Re-evaluation Due Date as stated on the Certificate of Compliance.

For all Audits the Programme Manager/Administrator will confirm in writing to the Applicant the agreed audit date and location, including the Site Audit Schedule for the Audit, a copy of which will be sent to the Auditor along with authorisation, in the form of a letter, to conduct an. A copy of this information shall be held on the Applicant's Individual File.

All Auditors, whether for Initial Audit or Re-audits, are required to declare to the CB any situation, which may give rise to a conflict of interest with respect to locations, they have been requested to assess. Each Auditor must confirm that they will notify the CB should such a situation arise through a signed Conflict and Confidentiality Declaration Form.

1.2 The Audit

CBs own Registered Auditors

The Auditor will bring with them to the On-site Audit the agreed Site Audit Schedule, which they must endeavour to follow as closely as possible.

CBs Sub-contracted Registered Auditors

The Sub-contracted Auditor will bring with them the confirmation letter sent to them from the Programme Manager/Administrator, advising of the Audit date, time, facility address and contact, along with the authorisation to conduct an Audit to the IFFO RS standard. This will serve as identification and validation of the Auditor, to carry out the Audit.

The Audit will be conducted against the current issue of the IFFO RS standard and will use an Approved Audit Report Format.

All Audit Evidence will be recorded as *Yes*, *No, or Non-applicable (N/A)* and substantiated with both positive and/or negative evidence to each clause of the IFFO RS standard. All areas, covering only those Marine Ingredients (Fishmeal and Fish Oil) products and processes that are from Approved Sources stated within their application to the IFFO RS standard, must be assessed. If not, reasoning must be noted in the Final Report. If the Auditor is unsure how to

score the evidence collated during an Audit to a specific clause within the IFFO RS standard, they must consult with the CBs for further guidance before the clause can be rated.

Initial Audits. The Auditor shall ensure that all areas of the IFFO RS standard are assessed.

Surveillance Re-assessment Audits. The Auditor will take into account Non-conformances and results from previous Audits and may focus more attention on areas of concern ensuring always that all areas of the IFFO RS standard have been assessed.

An Opening Meeting shall always be with the Applicant to confirm, as necessary, the scope of the Audit Visit to determine the availability of relevant Personnel, access to required areas, confidentiality of information, and Reporting Process.

The Auditor shall always complete the Approved Audit Report Form for the IFFO RS standard to ensure all aspects of the standard are addressed.

Sufficient notes will be taken during the Audit to demonstrate an identifiable Audit Trail against each clause assessed. These notes will include as appropriate reference to location, product identification, equipment or documents used, compliance with and availability of the Applicant's own documented Policies and Procedures where these form part of the IFFO RS standard Requirements. All notes taken during the Audit will be submitted along with the Audit Report to the Programme Manager/Administrator.

Any Non-conformance observed will be noted and agreed with the Applicant's Representative at the time of the Audit and will form part of the Final Closing Meeting.

The levels of Non-conformity are specific to the IFFO RS 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.

Where Non-conformances are noted, the Auditor will refrain from instructing the Applicant to take any particular course of corrective action.

On completion of the Audit, a Closing Meeting shall be held with the Applicant. The Auditor will discuss any Non-compliances raised, agreeing a corrective action and completion date for each. The corrective action and completion date will be recorded on the IFFO RS standard Non-Conformance Report (NCR) form which will be signed by both the Auditor and Applicant. The Applicant will be given a copy of the completed NCR form and will also be required to provide written confirmation and any agreed objective evidence, e.g. where appropriate photos, invoices and/or receipts, to the CBs Programme Manager/Administrator when corrective actions have been completed.

Where there is more than one Auditor used, e.g. in an integrated facility, a thorough and precise hand-over meeting must be held. This will serve to equip the Secondary Auditor fully with information regarding previous findings or missing components.

The Auditor on the Final Audit Report shall record where the Auditor is unable to agree a Non-conformance with the Applicant. The Non-conformance will still stand and the Applicant can appeal the decision to the CBs and to the Standard Holder IFFO RS Board (Please refer to the Appeals and Complaint Document).

All Audit will be conducted in a professional manner, as expeditiously as possible and with **the minimum disruption to the day to day activities of the applicant being assessed. The CBs** Auditor shall ensure they comply with In-house Policies whilst at the location being assessed.

1.3 The Reporting

The NRC form shall be sent by the Auditor to the CBs within 24 hours at the end of the Audit. The Programme Manager/Administrator will check the form has been completed correctly and will despatch it to the Applicant informing them by letter/email that they now have 21 days to close out the Non-compliances raised.

The Auditor shall submit the Final Report on the correct IFFO RS standard Audit Report Forms.

The Report will be a factual record of the results of the Audit and inspections carried out. It will clearly document any Non-conformance against the current IFFO RS standard Requirements and where appropriate corrective actions. Objective evidence is required and the agreed time scales for completion.

The Auditor shall sign the Final Report and forward to the Programme Manager/Administrator within 10 working days of the Audit. A copy of this Report will be submitted to Applicant once the final certification decision has been taken.

The Programme Manager/Administrator will notify the Auditor of the need for his/her presence at any meeting at which the Report will be reviewed in preparation for the Certification Decision.

1.4 Records

A copy of the Final Audit Report, NCR form and correspondence conveying the Certification Committees decision will be held in the Applicant's file for a period of 5 years or the duration of Certification Period if this is longer.

The Final Audit Report shall also be sent to the IFFO RS Head of Operations for record keeping and research purposes, but its contents shall be treated as strictly confidential and shall not be place in the public arena

Appendix 1

Code of Conduct for All CBs Staff/Auditors

Objective

To define the code of conduct, which shall be adhered to when operating the CBs certification services.

Responsibilities

Everyone in the CB, both office and home based has the responsibility to ensure their conduct does not compromise the independence, integrity and impartiality of the CB.

All managers are responsible for ensuring that staff is aware of the need to maintain independence, integrity and impartiality and operate in accordance with this procedure.

Procedure Independence, Impartiality and Integrity

It is essential that Audits and related activities are demonstrable independent of pressure from the inspected Applicant or any other parties. The CB must take steps to ensure that commercial activities, which have the potential to conflict with the inspection process, are avoided at all times.

The CB must not provide consultancy, advice or bespoke training. It is essential that the CB's staff, including the Auditors, do not offer advice, or provide information either at the time of the Audit or at any time that may compromise the independence, integrity, or impartiality of CB.

The following are examples of activities, but not limited to, that are prohibited:

- Providing specific recommendations to an Applicant on how requirements of the IFFO RS standard could be met.
- Providing documentation other than IFFO RS standard, CB certification protocols or Auditor inspection guidance notes.
- Providing advice in response to specific queries that could be interpreted as how an Applicant can comply with the correct IFFO RS standard.
- Providing advice on the design/ development of facilities or processes.
- Participating in the decision making process on Applicant's Management System matters.

Where unsolicited requests for such services are received the CB's staff is required to politely decline such requests and inform the applicant of the CB's policy.

Audit Process

Auditors shall be aware that Applicants require Audits which fully 'test' their systems against an agreed Standard such as the correct IFFO RS standard and which identify deficiencies that require appropriate preventative or corrective action. In addition, the judgment of the auditors must be based upon objective evidence and must be independent of any outside pressure or influence.

It is particularly important that the Audit is seen to be 'testing' by the Applicant because of the thoroughness of the Audit method and not because of the way in which the Auditor relates to the employees of the inspected applicant.

It is the 'questions asked' and 'not the way in which they are asked' which should determine this issue.

Audits shall therefore:

- Be thorough and be undertaken diligently.
- Auditors must be courteous at all times and avoid being influenced by their own emotions.
- Be aimed at gathering objective evidence to either support compliance to standards or to identify deficiencies.
- Conform to the CBs documented structure.
- Results in reports, which contain only those deficiencies discussed and agreed at the closing meeting.

Hospitality and Gifts

At all times the CBs staff and Auditors shall remain above reproach and their integrity and credibility maintained.

Whilst staff/Auditors may be provided with lunch or may be invited to dinner by Applicant's staff, it is clear that there is a 'fine line' between normally accepted Standards of Hospitality and possible bribery and corruption. The CB's staff therefore needs to act with caution and if in doubt refuse such hospitality.

Similarly, in relation to gifts, it is advisable to refuse such offers but again common sense needs to prevail. Factors to consider in such situations are as follows:

- Is the hospitality or gift within the normal bounds of commercial practice?
- What are the company's intentions?
- What is the stage of the audit – is the offer made after the closing meeting?

- Would public knowledge of the gift undermine the Auditor's or the CBs integrity and credibility?
- Would a legal defence in court be undermined by the offer?
- Is the gift an example of product produced on-site or has it been specifically purchased for the Auditor.

Where there is a clear attempt to bribe the Auditor, then the Audit Process should be ended and the CB's Senior Manager or Programme Manager/Administrator informed immediately.

Disciplinary Action

Any CB staff/ Auditors found to contravene this code of conduct guideline would be judged to have contravened their contract of employment and will be subject to disciplinary proceedings.

AMENDMENT LOG

DATE	ISSUE	AMENDMENT	AUTHORISED BY
08/05/2015	1.3	Introduction of IFFO RS Logos, IFFO RS Ltd and the wording Marine ingredients	Francisco Aldon
26/01/2016	1.4	Edit of title in 1.1 '*Pre-audit Process'*	Francisco Aldon
26/01/2016	1.4	Addition of wording in 1.1, fourth paragraph "*will be confirmed in writing to the applicant and the IFFO RS Secretariat from the Programme Manager/Administrator*."	Francisco Aldon
21/01/2016	1.4	Edit of section title, 1.1, paragraph 6 '*The pre-audit process for audits subsequent to the initial audit - termed here as "Re-audits - does not include a Pre-Audit Check."* '	Francisco Aldon
21/01/2016	1.4	Wording edit in 1.1, paragraph 6 "*to take into account changes in the Audit Frequency*"	Francisco Aldon
12/09/2017	1.5	Amendments to paragraph 4, page 1 "*If the Pre-audit Check is successful, the*	Francisco Aldon

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