



Procedure for the Submission of Comments regarding IFFO RS Fisheries, Factories, Standard and Process

This procedure outlines the process through which stakeholders can submit comments about IFFO RS applicant or approved fisheries, applicant or certified factories, the IFFO RS Standard, and the IFFO RS process.

1.1 Who are Stakeholders?

Stakeholders include fishery participants (fishers), fish processors, fish traders, government fishery management organisations, non-government organisations and other parties or persons having information that may be important in the assessment of fisheries to the IFFO Responsible Supply (RS) Certification Program.

1.2 Stakeholder Input on fisheries and factories

The IFFO RS Assessment Process follows the requirements of ISO 17065 Accredited Certification and includes a comprehensive Stakeholder Engagement Procedure, as follows:

Fishery assessments are conducted remotely to ensure the raw material used by IFFO RS factories is responsibly sourced. Assessments, either full or surveillance, take place annually, and consider a range of aspects of fishery management as defined in the IFFO RS Standard. Factories are assessed via a site visit, which again occurs annually. A typical site visit includes a one-day inspection of the facilities and paperwork to ensure that all the requirements of the IFFO RS Standard are met.

Stakeholders may submit information relating to fisheries or factories at any time during the assessment process. Information is submitted to the relevant Certification Body and to the IFFO RS Sustainability Officer. The information will be reviewed by the certification body with respect to its eligibility and bearing on the conformance of an Applicant or existing approved fishery or certified factory. In the case of fisheries which have not previously been approved, or factories which have not been certified, submissions will be considered during the full initial assessment. In the case of approved fisheries or certified factories, submissions will generally be considered at the next surveillance assessment. An exception to this rule is that if information is deemed to be likely to render the fishery and/or factory no longer compliant with the IFFO RS Standard, the Certification Body may elect to open up an immediate investigation. For this reason, all information submitted by stakeholders should be reviewed by the Certification Body as rapidly as practicable.

1.3 How to make a Submission

Doc C3					
Issued By	IFFO RS Limited		Approved By		Andrew Jackson
Issue Date	April 2016	Issue	1	Revision	1
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Stakeholders should submit via the Official Comment Form via the website below or by mailing the official form directly to IFFO at:

www.iffo.net/iffo-rs-standard-development-version-20

IFFO RS Sustainability Officer, IFFO RS Ltd, Unit C, Printworks, 22 Amelia Street, London, SE17 3BZ, United Kingdom

1.4 Eligibility Criteria

Eligible submissions must meet the following requirements:

- Submissions must be non-confidential and available for reporting and referencing within the Assessment Process and Final Certification Reports.
- Submissions must contain the name and contact details of the Submitting Entity or Person and their relationship with the Fishery subject to the submission.
- Submission must be made via Official Comment Form on the website. Submitted material that is not accompanied with the Official Submission Form will not be eligible for assessment purposes.

1.5 Submission Form

Automated confirmation of receipt of submissions will be provided to the e-mail address.

1.6 Stakeholder Input on the IFFO RS Standard

IFFO RS Ltd allows for comments on the IFFO RS Standard and its procedures to be submitted by any interested party at any time and considers them during the subsequent Standards Revision Process by the Technical Advisory Committee (TAC). These comments may relate to the Standard itself, to the fishery or factory assessment processes, or to any other aspect of the IFFO RS programme.

IFFO also engages with the public during the Standards Review Phase and Standards Development Phase in the format of an Open Comment Period.

The Administration Assistant responsible for publicizing the commencement of a formal Open Comment Period in the national seafood media. This will state the Standard and the window for comment: e.g.

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On *Month XX, 20XX* IFFO RS Limited opens a Public Consultation on the IFFO Global Standard for Responsible Supply (IFFO RS) (Current Version). IFFO RS will accept comments from *Month XX, 20XX* through to the end of the day *Month XX, 20XX*.

Stakeholders can submit via the Official Comment Form on the IFFO website, either electronically, via the web based portal below or by mailing the Official Form directly to IFFO at:

IFFO RS Administration Assistant, IFFO RS Ltd, Unit C, Printworks, 22 Amelia Street, London, SE17 3BZ, United Kingdom.

The Administration Assistant is responsible for collating the comments received and presenting these comments to the next TAC Meeting for discussion and resolution.

The Administration Assistant is responsible for responding to the parties who made submissions in the Open Comment Period either on the progress and/or the response to their submissions.

The Administration Assistant will hold all comments on file and a record of the TAC Findings.

1.7 Records

The Administration Assistant keeps on file (electronically) for a period of at least one full Standards Revision the following records related to each Standard Development or Revision Process:

- Policies and Procedures guiding the Standard Setting Activity;
- Lists of Stakeholders contacted;
- Interested parties involved at each stage of the process;
- Comments received and a synopsis of how those comments were taken into account; and
- All draft and final versions of the Standard.

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AMENDMENT LOG

DATE	ISSUE	AMENDMENT	AUTHORISED BY
28/01/2016	1.1	Addition of IFFO RS logo heading, footer, water mark and page numbers.	Andrew Jackson
28/01/2016	1.1	Formatting of font across entire document.	Andrew Jackson
23/02/2016	1.1	Addition of text in first paragraph <i>“applicant or approved fisheries, applicant or certified factories, the IFFO RS Standard, and the IFFO RS process.”</i>	Andrew Jackson
23/02/2016	1.1	Amendments to the text in 1.2 from the first line of the second paragraph to the last line of the final paragraph in 1.2 <i>“Fishery assessments are conducted remotely to ensure the raw material used by IFFO RS factories is responsibly sourced. For this reason, all information submitted by stakeholders should be reviewed by the Certification Body as rapidly as practicable.”</i>	Andrew Jackson
04/05/2016	1.1	Change of responsibility in where previously stated as the responsibility of the Sustainability Officer, is now stated as the responsibility of the ‘Administration Assistant’	Andrew Jackson

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