IFFO RS CoC V2 (DRAFT1)
Global Standard for Responsible Supply

General Guidance

Compliance ratings

Each of the requirements of the IFFO RS CoC V2 Standard must be awarded one of the following conformance levels as defined by the Auditor Guidance:

Full compliance – The Applicant meets the intent of all IFFO RS CoC V2 Standard requirements.

At the initial certification audit **all Non compliances will need to be addressed** in an effective action plan and closed off or downgraded prior to certification.

Minor Non-conformance Definition – 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.

A Minor Non Compliance identified at the initial certification the CB shall not issue a certificate until these have all been addressed in an effective action plan that as been agreed by the CB .

Definition of an Effective Action Plan

For an action plan to be deemed to effective it shall address the following key areas:

- An appropriate time frame to address and resolve the noncompliance shall be given
- A root cause analysis of why the noncompliance was identified
- What actions shall need to be incorporated into the policy and procedures to ensure that future non compliances shall not occur
- An appropriate person to oversee that the noncompliance has been resolved shall be identified

At an annual surveillance a raised Minor Non-Conformity does not prevent the Applicant from maintaining its certification to the IFFO RS CoC V2 Standard, but an action plan is presented and this shall be a focus of the subsequent surveillance audit. If subsequently the organisation is deemed to still fall short of Full Compliance, the auditor will upgrade the non-compliance and award a Major Non-Conformity and corrective action will be required before certification can be maintained.

Note- The only exception to this rule is under circumstances where a Minor Non-Conformity is raised due to records not being maintained for a sufficiently long duration. In these circumstances, the Minor Non-Conformity will remain Minor as long as records continue to be built up. This is to reflect the impossibility of creating 3 years of records in 1 year.

Major Non-conformance Definition– Any non-conformity other than critical, which may result in failure for health or safety and which cannot be 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.

All Major Non-Conformity must be closed off or downgraded before the Applicant can be certified to the IFFO RS CoC V2 Standard.

If the CB cannot close off or down grade a major noncompliance in a period of 3 calendar months for new application and 1 calendar month for an annual surveillance from the point at which it is raised the CB will need to instigate a full re-audit.

At this point in the process if it is an existing client's their IFFO RS CoC certificate shall be suspended until this re-audit has been conducted. If this re-audit determines that no non compliances were found then the client's certificate shall be re-instated.

Downgrade definition – the applicant can provide evidence which challenges the auditor's original decision on the grading of the original non-compliance sufficiently to allow a lower grading on the non-compliance to be issued

Critical Non-conformance Definition – 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 or By-product for the IFFO RS programme, or the auditor has been deliberating mislead on the credibility of the information provided by the applicant, the Applicant shall not gain certification.

It could also mean more generally that the Applicant has broken any legal obligation which puts food safety, employee safety, or worker welfare at risk. This does not necessarily need to relate to a specific requirement in the IFFO RS CoC V2 Standard, but the details of the critical non-conformity must be detailed by the auditor.

In the event of a Critical Non-Conformity, the auditor will end the on-site assessment immediately if the safety of the auditor is compromised. The CB must not grant certification to the Applicant, and any future applications to the programme by the Applicant must include documented evidence of the policies and/or systems put in place to ensure the Critical Non-Conformity does not re-occur. It is

proposed that a period of 6(six) months should be given before an applicant can be reapply for the certification to the standard to ensure that the systems to prevent this critical noncompliance re-occurring have been fully embedded into the applicant's quality management systems and culture

If a critical noncompliance is raised for an existing client, the CB shall immediately suspend the IFFO RS CoC certificate pending a full investigation by the CB and if the noncompliance is up held the client shall have its certificate withdrawn and it shall not be allowed to re-apply for the standard for a period of 6(six)months.

TRANSISTION Process oF Current Certificate Holders to New CoC Standard

The new V2 IFFO RS V2 standard shall be approved by the GBC and released on the IFFO RS website. The new V2 IFFO RS CoC shall become effective after a period of no longer than 6 months after this release date.

A transition process for existing CoC Holders to adopt this new standard will be approved by the IFFO RS GBC. The plan will be that all valid certificates to the IFFO RS CoC V1 shall be honoured by the IFFO RS approved CBs for 1(one) year only after the new standard becomes effective.

No re-certifications or new certifications to version 1 of the CoC shall be issued by the approved CBs after the date the new standard Version 2 is **released**. This will effectively mean that no re-certification or new application audits shall take place up to a period 2 (two) months prior to the IFFO RS CoC Version 2 release date to allow the CB enough time to conduct the ensure certification process to Version 1 in a timely manner. If the process is not completed to time, then a IFFO RS CoC Version 1 certificate will not be issued.

Any new applications are certifications within this time period of no auditing to IFFO RS CoC Version 1 until Version 2 comes into effect will be placed in a holding position until the Version 2 is ready to be certified against. For the case of recertifications the CBs will be asked to extend a client'scertificate to take into account this time period when they cannot be audited and certified

Note- rationale for this 6-month time period will allow IFFO RS to undertake auditor training with the approved CBs and allow new and current CoC applicants or clients to become familiar with the new requirements within V2 IFFO RS CoC Standard.

Clause-by-Clause Guidance

SECTION 1 – General Principles of Traceability

1.1 The applicant shall have a documented and signed policy that states that they are committed to achieving and adhering to the requirements of the IFFO RS Chain of Custody Standard.

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance
N/A	The applicant has not documented its commitment to the IFFO RS Chain of Custody Standard.	The applicant has a document that states that they are committed to the IFFO RS Chain of Custody Standard, but the document/policy has **not been approved** or ratified by the site's CEO or an equivalent senior manager.	The applicant site has a written commitment to the IFFO RS Chain of Custody Standard. This document has been approved and signed by the site's CEO or an equivalent senior manager.

Additional Notes

Policy must be signed by the person with overall responsibility for the site. The rationale for this clause is to ensure that there is senior management commitment to the implementations of this standard within the applicant's QMS and to support the staff whose role it is to enforce compliance.

1.1.1 The applicant shall have a process to ensure that this policy is communicated to all staff within the site.

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance
N/A	No attempts to communicate policy made to all staff.	The applicant can demonstrate that the policy has been communicated but has not included all relevant staff.	The applicant can demonstrate that this policy has been fully communicated to **all** staff. For example, during new staff inductions, staff training etc

Additional Notes

The rationale of this clause is to re-enforce that all staff in the applicant's organisation are aware of this commitment to this standard to drive positive behaviour to ensure they continuously meet the requirements of the standard. This policy could be communicated through various channels such as training workshops, new staff inductions, posters etc.

1.2 The applicant shall have a documented and **effective supplier approval and monitoring system** to ensure that incoming marine ingredients intended to be identified as compliant, are sourced from an approved fishery, or a certified supplier that holds a valid IFFO RS or IFFO RS CoC certification.

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance
No monitoring of suppliers and input material for IFFO RS compliant marine ingredients that leads to non-compliant products including that from possible IUU sources being labelled as IFFO RS compliant.	System not operational or is not effective at being able to differentiate between different suppliers. Certification status of each supplier is not clear.	N/A	The applicant will have an up-to-date system of IFFO RS certified suppliers and be able to demonstrate that they hold a valid IFFO RS or IFFO RS CoC certification.

Additional Notes

An Auditor confirms suppliers are certified against the IFFO RS Factory or CoC Standard with the correct species in scope associated with the information found in the certificate code.

The applicant shall ensure that only marine ingredients that has been produced in an IFFO RS certified site from an approved IFFO RS fishery or recognised IFFO RS -MSC fishery are used to produce these compliant marine ingredients.

1.2.1 IFFO RS compliant marine ingredients that are purchased from a third-party agent, or broker that does not physically handle or own the certified product. The **applicant shall have documents/evidence provided from these suppliers** in place, to prove the identity of the marine ingredient back to an approved fishery or by product.

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance

There is clear evidence that the marine ingredient is sourced from non-certified or approved fishery and is labelled as IFFO RS compliant	No list of these type of suppliers provided by third-party, or documents provided show that the supplier is not certified/ certification status of suppliers is not clear.	Documents are occasionally incomplete meaning a traceback cannot be completed.	If the third-party is not certified to the IFFO RS CoC Standard they can provide full documentation to allow complete traceback of marine ingredient to approved fishery, or a supplier that holds a valid IFFO RS or IFFO RS CoC certificate for factory marine ingredients. or from a fishery in the IFFO RS Improver Programme.

Additional Notes

An Auditor confirms suppliers are certified against the IFFO RS Factory or CoC Standard with the correct species in scope associated with the information found in the certificate code.

The applicant shall ensure that only marine ingredients that has been produced in an IFFO RS certified site from an approved IFFO RS fishery or recognised MSC fishery are used to produce these compliant marine ingredients.

Auditor note: the applicant will be exempt from this clause if the third-party agent, trader or broker is certificated to the IFFO RS CoC Standard. If so, then clause 1.2 will need to be satisfied.
If an agent or broker does own the product then they will be treated as any other supplier and need an IFFO RS CoC certificate, if they do not wish to be certified then they will be treated as a subcontractor to the applicant and follow the requirements in Section 3

1.2.1.1 IFFO RS compliant marine ingredients that are purchased from a third-party agent, or broker that does not physically handle or own the certified product. The **applicant shall ensure that they have been trained/made aware/informed on the requirements to maintain the product integrity status of these certified materials and shall sign a form stating their commitment to the IFFO RS CoC standard**.

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance
	No training of any kind has been conducted by the applicant with the agent/broker on the need to maintain the product integrity	Training is in evidence but there is no signed commitment in place with the Agent or Broker	If the third-party agent of broker is used to source supplies of the IFFO RS compliant marine ingredients there shall be documented evidence that training has been undertaken by

	of the certificated IFFO RS Marine ingredients.		the applicant to this entity to ensure that they fully understand and commit to comply with the requirements to the IFFO RS CoC standard to maintain the product integrity of the IFFO RS compliant marine ingredients. After this training has been completed the agent/broker should sign a declaration that they understand the requirements and will comply with them .

Additional Notes

An Auditor confirms this training has been conducted and there is a signed agreement between the applicant and agent/broker

1.3 A current batch/lot record of all IFFO RS compliant marine ingredients **received by the applicant shall** be maintained.

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance
Records are false and/or show that non-compliant material is used as IFFO RS.	No batch/lot record, or Records appear to be often incomplete/ erroneous.	Information appears to be occasionally missing.	Batch/lot record of all IFFO RS compliant marine ingredients is fully maintained.

Additional Notes

A batch/lot record is required for the traceability verification test (see clause 2.5 requirements) and volume reconciliation and will support in fraud mitigation from duplication or substitution.

1.3.1 The batch/lot record shall contain the following information;

- Supplier name
- Supplier unique IFFO RS certificate number
- Volume of IFFO RS compliant marine ingredients received from each supplier.
- Key Data Element (KDE) information on the source fishery for whole fish to include, fishing vessel(s), species, catch area and date of landing
- Key Data Element (KDE) information on source processing a factory for by-product trimmings to include factory name, species and date of processing

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance
Basic information (e.g. supplier names) and volumes of IFFO RS compliant marine ingredients received is falsified. This would **compromise the basic traceability requirements of this standard.**	Basic information (e.g. supplier names) and volumes of IFFO RS compliant marine ingredients received is missing. This would **compromise the basic traceability requirements of this standard.**	For several records, information is incomplete/ has been entered incorrectly. Information appears to be occasionally missing.	Supplier details, volumes of product, and KDE information is comprehensive and appears to have been entered correctly.

Additional Notes

It is important to record this data as it can be used to document where and how much material the applicant is using to a) ensure that a credible statement and assurance can be given to their customer and b) can be used to mitigate potential acts of fraudulent behaviour through duplication or substitution

If a KDE system is adopted, then a lot of this standard could be streamlined into a verification of data input into a third-party digital platform.

1.4 The applicant shall have a **documented product management system** in place to demonstrate how IFFO RS compliant marine ingredients are **segregated and labelled** from non-certified product during all the processes within the Applicants organisation.

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance
There is found to be **deliberate mis-labelling of products, or gross negligence**. On review by the auditor there is clear evidence that non IFFO RS compliant material is being mixed with IFFO RS compliant material and the subsequent marine ingredients have still been labelled as IFFO RS compliant.	The applicant **does not** have a documented product management system appropriate for the activities of the organisation. Or the applicant has some processes in place but there is evidence of some non-segregation leading to potential mis-identification of products.	The documented processes that are in place could be improved to reduce the risk of mixing of IFFO RS certified with non-certified materials.	The applicant has a demonstrably effective product management system in place to keep labelled IFFO RS product **separated** from marine ingredients that is produced from non-approved material or from a fishery in the IFFO RS Improver Programme.

Additional Notes

Also see requirements for clauses 2.1 and 2.2. The product management system will be appropriate to the context of the organisation. If for example the organisation only ever deals with IFFO RS compliant products then this could be a specific document/ statement.

If the organisation deals with multiple product lines of similar non-compliant product the organisation will have to document in their product management system how IFFO RS compliant marine ingredients are kept segregated and labelled from non-compliant products, paying particular attention to key handing points (see subclauses for 2.1 and 2.2) where risk of mis-identification / substitution could occur.

1.5 A **documented non-conforming product procedure** shall be in place and **implemented effectively** by the Applicant to deal with any non-conformances detected as a result of a failure of the Marine ingredients product management system stated in 1.4 which may result in IFFO RS compliant Marine ingredients being mixed with non-compliant material.

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance
The applicant does not have a process and on review by the auditor there is **clear evidence** that non IFFO RS compliant material is being mixed with IFFO RS compliant material and the subsequent marine ingredients have still been **labelled as IFFO RS compliant.**	The applicant's system when reviewed by the auditor **highlighted significant flaws** in the system they used, which if not reviewed and amended **could cause** the compliant IFFO RS material to be mixed with non IFFO RS material and mislabelled.	The applicant has a documented non-conforming product procedure, but parts of the process are not being complied with and **improvements could be made to ensure it is implemented effectively**.	The applicant will have a **procedure in their product management system on how** to deal with the case where a loss of traceability or eligibility of IFFO RS compliant material has occurred.

Additional Notes

The applicants CB (see clause 1.6.3) and customer (see clause 1.6.4) will be notified in the event of a non-conforming product procedure being activated. This will usually entail the requirement to have an effective quarantine system in place for any product that was found to be outside the scope of this standard or is suspected to be due to a loss of identification and traceability.

If a non-conforming product procedure has been activated the applicant can demonstrate that this was implemented effectively.

The non-conforming product procedure would ideally be captured in the **applicant's product management system.**

If a non-conforming product procedure has been activated previously the applicant can show that they have implemented this effectively (though see subclauses 1.6.1 – 1.6.4).

1.6 Any Corrective actions resulting from a non-conforming products procedure shall be accurately documented;

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance
N/A	Non-conforming products procedure activated but no corrective actions documented.	Corrective actions not sufficiently documented and could be made clearer.	Corrective actions have been accurately documented. OR No non-conforming product procedure activated.

Additional Notes

Some of sub-clauses 1.6.1 – 1.6.4 may not be relevant if the applicant has not been required to instigate a non-conforming products procedure.

Any previous non-conformances that the applicant has raised should not be flagged as an NC for the purpose of this audit if the applicant can demonstrate how these NCs were acted on, and safeguards put in place to reduce the risk of a similar NC occurring in the future.

1.6.1 These actions shall identify authorised responsible personnel to handle the remedial actions required based on their severity or risk.

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance
N/A	Authorised responsible personnel not identified.	N/A	Authorised responsible personnel identified based on the risk level of the non-compliance identified. OR No non-conforming product procedure activated.

Additional Notes

Responsible personnel need to be identified so somebody has ownership of the corrective action.

1.6.2 All remedial actions shall be part of a corrective action plan to mitigate these incidents happening again in future and shall be time specified.

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance
N/A	No remedial actions stated.	Remedial actions stated though not time specified. No plan in place to suggest that similar incidents will be effectively mitigated against.	Remedial actions are clearly stated and time bound. They are shown to be part of a plan to ensure these incidents are mitigated against in future. OR No non-conforming product procedure activated.

Additional Notes

Any remedial actions will inform improvements made to the **product management system (clause 1.4)** and/ or **non-conforming product procedure (clause 1.5)** to ensure similar incidents are mitigated in future.

1.6.3 The applicant's certification body shall be notified in the event of product recall being actioned as result of this non-conforming product procedure being activated.

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance
N/A	The applicant does not have a documented product recall procedure and maintains no list of who should be informed in the event that IFFO RS material is recalled. OR In the event of a non-conforming product procedure being activated that resulted in a product recall and the CB wasn't informed.	The applicant does have a recall procedure, but it has not indicated that it will inform the certification body that issued them with the IFFO RS certificate.	The applicant will have a procedure in their management system on the product recall requirements for IFFO RS certified marine ingredients. In this procedure, there will be a list of contacts that should be informed and one of these will need to be the certification body that awards them their IFFO RS certificate. The time frame for informing the certification body (i.e. **within 48 hours**) shall be stated within this procedure.

Additional Notes

It is essential that the CB is made aware of any non-conformances against the standard between audits.

1.6.4 Any customer that may be affected by a non-conforming IFFO RS product shall be informed **immediately and no later than 48 hours** of detecting this issue by the applicant.

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance
Customer not informed	Customer informed, though not within 48 hours (or this cannot be adequately evidenced at the audit). .	n/a	Customer has been informed within 48 hours of an issue being detected. OR No non-conforming product procedure activated.

Additional Notes

Ideally the customer should be notified as soon as possible so they do not inadvertently claim that the product is IFFO-RS certified.

1.7 All records relating to the execution of this non-conforming product procedure shall be retained for a **period of at least 3 years**.

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance
N/A	The applicant does not have a system in place to maintain the records for this period of time and on inspection by the auditor there are significant records which are now not available.	The applicant does have a system in place to maintain the records for this period of time and on inspection by the auditor there are up to two significant records which are now not available.	The applicant will have a procedure that requires all records for non-conforming products to be kept for three years in their management system. The records can either be in a hard or soft format. The auditor should take a sample of records to confirm that this procedure is being adhered to.

Additional Notes

This is standard good practice. Where a Minor Non-Conformity is raised due to records not being maintained for a sufficiently long duration. In these circumstances, the Minor Non-Conformity will remain Minor as long as records continue to be built up. This is to reflect the impossibility of creating 3 years of records in 1 year.

1.8 The applicant has a HACCP system in place to protect the integrity of products being produced within their operation.

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance
No HACCP systems are in place which can lead to food safety issues and fraudulent activity	The HACCP **system is not appropriate** to the specific circumstances at the facilities under assessment. OR The applicant has no such system in place in operations where it is required.	The HACCP system **is largely appropriate** to the specific circumstances at the facilities under assessment though improvements could be made.	The HACCP system is appropriate to the specific circumstances at the facilities under assessment ((i.e. is the manufactured product for human / animal consumption?).

Additional Notes

Note that the requirements of this clause may not be required for organisations that are not undertaking any processing (e.g. traders).

Hazard Analysis Critical Control Point (HACCP) evaluates the entire production process step by step from delivery intake to packaging and transport of the completed product. During the HACCP any stages where the product could be subject to **physical, microbiological or chemical contamination** are identified. Measures are put in place for those deemed critical (i.e. temperature controls, cleaning etc.) and these are regularly monitored to ensure that the end product is safe for human consumption.

If a applicant has a GFSI certification the auditor shall check to see what areas are covered within these certification requirements to help prove compliance with this standard clause

1.8.1 The applicant has a TACCP/VACCP system in place to protect the integrity of products being produced within their operation if it is producing products that are intended direct human consumption.

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance
No TACCP/VACCP systems are in place which can lead to food safety issues and fraudulent activity N/A	The TACCP/VACCP **system is not appropriate** to the specific circumstances at the facilities under assessment. OR The applicant has no such system in place in operations where it is required.	The TACCP/VACCP system **is largely appropriate** to the specific circumstances at the facilities under assessment though improvements could be made.	The TACCP/VACCP system is appropriate to the specific circumstances at the facilities under assessment ((i.e. is the manufactured product for human consumption?).

Additional Notes

Note that the requirements of this clause may not be required for organisations that are not undertaking any processing (e.g. traders).

Threat Assessment Critical Control Point (TACCP) is concerned with the **prevention of deliberate and intentional food fraud**. This can take the form of substitution of ingredients, passing off of one foodstuff for another, false or misleading statements for economic gain that could impact public health, product tampering, fake or incorrect labelling etc.

Vulnerability Assessment Critical Control Point (VACCP) identifies how vulnerable various points in the supply chain are to the threat of economically motivated adulteration.

If an applicant has a GFSI certification the auditor shall check to see what areas are covered within these certification requirements to help prove compliance with this standard clause

SECTION 2 – Traceability Verification and Labelling

2.1 IFFO RS compliant Marine ingredients or the finished product **shall** be labelled or otherwise be identified in a manner that ensures traceability is maintained during the following key traceability steps if an IFFO RS logo or certified claim is to be made on the applicant's finished product:

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance
There are **no processes in place** to enable traceability of IFFO RS Compliant materials and finished products. **AND** the **finished product is still identified/ claimed to be IFFO RS certified.**	There are **some processes in place** to enable the traceability of IFFO RS Compliant materials and finished products, but there is strong evidence that **they are often ineffective**. The traceability process is inadequate to ensure that information remains with the IFFO RS Compliant product at all stages outlined in clauses 2.1.1 – 2.1.8.	There are processes in place to enable the traceability of IFFO RS Compliant materials and finished products, but there is some evidence that they **may not always be effective/ improvements could be made**.	Applicant ensures that IFFO RS compliant materials and finished products are identifiable at all stages outlined in clauses 2.1.1 – 2.1.8 with required documentation in place.

Additional Notes

Documentation received with certified products needs to clearly identify the product as certified. This may include the following:

- delivery notes,
- invoices,
- bills of lading, or
- electronic information from the supplier.

Information captured upon receipt pertaining to the batch/lot record (clause 1.3.1) must not be lost during production to ensure that full traceability can be maintained (clause 2.3). If a supplier uses an internal system (such as barcodes or product codes) to uniquely identify certified products on documents, the applicant must understand the supplier's description in order to confirm the product is certified.

Additionally, it is recommended that certified products are identifiable as certified on the physical product as well as on the accompanying traceability records. This can be done by placing a sign or label on the package, container, or pallet. Organisations can use a variety of methods to identify certified products, including acronyms (e.g., 'IFFO RS'), the CoC certification code, or another internal system of identification.

Where it is impossible or impractical to label physical products, the applicant will need to demonstrate how the product can be linked with associated traceability or inventory records that specify the certified status.

The auditor should note that if associated records do not clearly identify products as certified**, it is not sufficient** to rely only on physical product labelling (e.g., an IFFO RS label on a container) to confirm the certified status.

2.1.1 from the point of receipt,

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance
N/A	No process in place and the effectiveness of the system is not credible No documentation arrives with product upon receipt.	Process to ensure traceability is in place but there are identifiable isolated cases where it is proven to be ineffective (e.g. documentation incomplete, not clear).	IFFO RS compliant materials arrive clearly labelled (where this is feasible) with appropriate documentation.

Additional Notes

2.1.2 during initial storage,

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance
N/A	No inventory in place identifying where IFFO RS compliant materials are stored and it deemed not to be an effective system.	Inventory incomplete/ IFFO RS compliant materials not located where the inventory states them to be isolated cases.	IFFO RS compliant materials are clearly labelled in storage, and there is an inventory showing where IFFO RS compliant materials are stored.

Additional Notes

2.1.3 during processing,

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance
N/A	Batch/lot number(s) not recorded for IFFO RS compliant materials that have gone to processing.	Improvements could be made to system to minimise risk of errors.	During processing the batch/lot number(s) of the IFFO RS compliant material is recorded.

Additional Notes

2.1.4 during work in progress storage,

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance
N/A	No inventory in place identifying where IFFO RS compliant materials are stored.	Inventory incomplete in isolated instances.	IFFO RS compliant materials are clearly labelled in storage, and there is an inventory showing where IFFO RS compliant materials are stored.

Additional Notes

As clause 2.1.2.

2.1.5 during packaging,

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance
N/A	Packaging is not correctly labelled. Documentation is not in place that would allow traceability of the packaged product back to supplier / source fishery.	Improvements could be made to ensure that associated documentation is accurate for the packaged product.	Packaging is correctly labelled/ claims are correct. Associated documentation is in place that would allow traceability of the packaged product back to supplier / source fishery.

Additional Notes

See Section 4 use of certification logo/ claim. If subcontractor also see Section 3 requirements.

2.1.6 during final storage, and third-party storage

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance
N/A	No inventory in place identifying where IFFO RS compliant materials are stored.	Inventory incomplete in isolated instances.	IFFO RS compliant materials are clearly labelled in storage, and there is an inventory showing where IFFO RS compliant materials are stored.

Additional Notes

As 2.1.2. If subcontractor also see Section 3 requirements.

2.1.7 during final dispatch, handling

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance
N/A	Invoice sent to buyer does not state batch/lot codes and any claim (e.g. “this product is IFFO RS compliant”) cannot be substantiated.	Invoice missing some details and could be improved.	Invoice for product contains batch/lot codes to allow buyer of the IFFO RS compliant product to traceback to source fishery if required.

Additional Notes

If subcontractor also see Section 3 requirements.

2.1.8 during delivery to their customer

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance
N/A	No delivery note / invoice received by buyer.	Delivery note / invoice missing some details and could be improved.	Upon delivery buyer receives copy of a delivery note (or invoice) stating batch/lot codes of IFFO RS compliant product.

Additional Notes

If subcontractor also see Section 3 requirements.

2.2 IFFO RS compliant Marine ingredients shall be segregated by the applicant from non-certified product by either:

- Physical separation or
- Temporal separation

And shall have documented evidence to prove this during the following key traceability stages if an **IFFO RS logo or certified claim is to be made on the finished product**:

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance
N/A	It **cannot be evidenced that IFFO RS approved finished products have been kept physically or temporally separated from non-certified fish products during production.** At the key traceability stages outlined in clauses 2.2.1 – 2.2.8 there is a risk that non-certified fish products could have been mixed with IFFO RS approved fish products.	Physical / temporal separation of IFFO RS approved products from non-certified products is apparent, though there are some key traceability stages where this could be improved.	Throughout the production process IFFO RS approved materials and the IFFO RS approved finished product(s) are kept physically or temporally separate from non-certified products, and the applicant can provide evidence of this.

Additional Notes

The IFFO RS logo should be used only in connection with marine ingredients from certified fishmeal plants expressly identified in the list of certified plants in the IFFO RS website www.iffors.com The IFFO RS Chain of Custody logo should be used only in connection with the marine ingredients from certified fishmeal plants expressly identified in the Chain of Custody Certificate issued to Licensee.

The statement **"this product is IFFO RS compliant"** can only be used if the marine ingredient factory and all the raw material meet the standard.

2.2.1 from the point of receipt,

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance
N/A	IFFO RS compliant materials are not kept physically separate from non-certified products in the same arrival.	N/A	IFFO RS compliant materials are delivered separately/ clearly segregated from non-certified materials.

Additional Notes

2.2.2 during initial storage,

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance
N/A	IFFO RS compliant materials are not kept separate from non-certified materials in storage.	N/A	IFFO RS compliant materials are kept separate from non-certified materials in storage.

Additional Notes

2.2.3 during processing,

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance

N/A	No system in place to ensure that IFFO RS compliant materials are kept physically or temporally separated from non-certified materials.	N/A	A separate processing line is used for IFFO RS compliant materials or processing of IFFO RS compliant materials from uncertified materials is temporally separated.

Additional Notes

2.2.4 during work in progress storage,

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance
N/A	IFFO RS compliant materials are not kept separate from non-certified materials in storage.	N/A	IFFO RS compliant materials are kept separate from non-certified materials in storage.

Additional Notes

2.2.5 during packaging,

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance
N/A	IFFO RS compliant products are not packed separately from non-certified products.	N/A	IFFO RS compliant products are packed separately from non-certified products.

Additional Notes

See Section 4 use of certification logo/ claim. If subcontractor also see Section 3 requirements.

2.2.6 during final storage and third-party storage,

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance
N/A	IFFO RS compliant materials are not kept separate from non-certified materials in storage.	N/A	IFFO RS compliant materials are kept separate from non-certified materials in storage.

Additional Notes

If subcontractor also see Section 3 requirements.

2.2.7 during final dispatch, handling

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance
N/A	IFFO RS compliant materials ready for final dispatch are not kept separate from non-certified materials also in the same shipping consignment.	N/A	IFFO RS compliant materials ready for final dispatch are kept separate from non-certified materials.

Additional Notes

If subcontractor also see Section 3 requirements.

2.2.8 during delivery to customer

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance
N/A	During delivery IFFO RS compliant materials are not kept separate from non-certified materials.	N/A	During delivery IFFO RS compliant materials are kept separate from non-certified materials.

Additional Notes

If subcontractor also see Section 3 requirements.

2.3 The applicant shall maintain accurate records that allow quantities / volumes of IFFO RS compliant Marine ingredients and the finished product bought and sold (or received and dispatched) to be calculated taking into account production practices that could affect the final quantity or volume using a MASS balance exercise.

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance
The records have been falsified and the applicant is duplicating or substituting the qualities/volumes of IFFO RS compliant marine ingredients N/A	No records of quantities/ volumes of products are kept. There is a clear discrepancy between calculated qualities/ volumes recorded and does not match those losses than can be justified by the applicant's product processing practices, if applicable	Records are kept though inaccurate or not comprehensive for full range of products.	The applicant maintains accurate up-to-date records of quantities/ volumes of fishmeal/ fish oil /finished product bought and sold across their entire product range.

Additional Notes

To obtain the percentage of IFFO RS certified material inputs used in the applicant's operation, calculate the annual sum of certified IFFO RS marine ingredients inputs divided by total Annual sum of all marine ingredient materials used. This shall need to be reported to IFFO RS so that % of certified IFFO RS compliant material sold in the final product cannot be exceeded, therefore mitigating against potential fraud through duplication or substitution.

If no records of quantities/ volumes have been kept, the applicant will have 3 calendar months if they are a new applicant and 1 calendar month if an existing client to ensure that they have a procedure in place to ensure that they start building up records prior to the next audit. If this is the case, this will be the focus of the subsequent surveillance audit.

The auditor shall conduct a mass balance on each source of compliant IFFO RS marine ingredient to cross reference with the information supplied by the applicant

Auditor note- some calculation of a loss of mass/volume may occur as a result of processing practices- these will need to be review on an individual applicant basis and shall be justified by the applicant through documented evidence

2.4 The applicant shall report on input quantities and finished product quantities used on a quarterly basis to IFFO RS

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance
N/A	No reporting to IFFO RS. Or the applicant reports on input quantities and finished product quantities to IFFO RS only very occasionally. There are significant errors in quantities being reported.	The applicant generally reports to IFFO RS on input quantities and finished product quantities. Minor improvements could be made to reporting.	The applicant reports on input quantities and finished product quantities to IFFO RS on a quarterly basis. These records can be obtained from IFFO RS.

Additional Notes

The intent of this is so that IFFO RS can continuously monitor applicants input and finished product quantities between audits to ensure that % of certified IFFO RS compliant material sold in the final product cannot be exceeded.

Suggest that these volumes are recorded in a website only open to members of the IFFO RS standard and these figures will identify what is being used and where. This must be confidential, and the data protected

2.5 The **applicant shall conduct a documented verification test** of their **product management system across the entire range of** IFFO RS compliant Marine ingredients or by the finished product by **batch/lot numbers or volume produced** to ensure **that full traceability can be determined** from the applicant's Marine ingredients supplier to final despatch of the finished product to their immediate customer and **vice versa**.

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance
No traceability of seafood ingredients can be demonstrated by the applicant AND finished product is still **claimed to be IFFO RS certified**.	The Traceability Test/ Volume Reconciliation exercise do not make sense or demonstrate that claims made on the finished product could be erroneous.	Improvements could be made to traceability documentation, or there are minor errors that the auditor flags up. The test could cover a more comprehensive range of the applicant's products.	Following the **Traceability Test**, complete traceability can be demonstrated following batch/lot numbers for the entire range of IFFO RS compliant marine ingredients, and finished products. If a **Volume Reconciliation** exercise is undertaken the volume/ weight of seafood in IFFO RS compliant finished products does not exceed the weight of IFFO RS compliant raw materials.

Additional Notes

The applicant should display the findings from the traceability test in the **Traceability Test** Template and if appropriate a **Volume Reconciliation** exercise should be undertaken (see tabs in supplementary spreadsheet entitled ***Traceability verification test – guidance and templates***).

The **Volume Reconciliation** exercise is particularly important if the factory is a processor that also processes non-certified fish products that are of similar nature to the certified fish products. This to provide assurance that the volume/ weight of seafood in IFFO RS compliant finished products does not exceed the volume/ weight of IFFO RS compliant input materials.

2.5.1 This verification test shall be carried out at **least once per year with a gap no greater than 12 months between tests** and shall include a traceability challenge both **from receipt to despatch and from despatch back to receipt**

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance
N/A	The applicant has not conducted a traceability test during the preceding 12 months.	The applicant has carried out a test within the 12 months since the last audit, but aspects of the test are missing (e.g. no trace forward / trace back).	The applicant can demonstrate that the verification test has been carried out at least once per year, and that a **trace forward** (receipt to dispatch) and **trace backwards** (dispatch to receipt) traceability test has been carried out for the full range of IFFO RS compliant products.

Additional Notes

IFFO RS compliant materials from suppliers c**an be traced forward to final dispatch** of the finished product.

IFFO RS compliant materials in finished products **must also be able to be traced back to supplier and source fishery**. Note that production may use a range of different sources of IFFO RS compliant materials, as such several suppliers and source fisheries may be identified.

2.6 Any corrective actions resulting from non-conformities raised during this verification test of the product management system shall be accurately documented;

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance

N/A	Non-conformities have been raised though corrective actions have not been specified.	Non-conformities have been in captured in a template along with corrective actions. Detail may be lacking (e.g. no timeline/ authorised personnel specified for corrective action to be undertaken).	Non-conformities and corrective actions are fully documented by the applicant in the template in the **Non-Compliance tab** in the supplementary spreadsheet entitled ***Traceability verification test – guidance and templates.*** OR No non-conformities were raised during the applicant's verification test.

Additional Notes

It will be responsibility of the applicant to ensure that non-conformities from the verification test will be corrected. The intent here is to enable the applicant to routinely test their product management system and make improvements if necessary. This is considered to be industry good practice.

Note that the applicant will not receive any NC from the auditor for identifying non-conformities during the verification test as long as they can demonstrate that NCs raised during the verification test have been corrected. This will encourage the applicant to be transparent.

If no non-conformities were raised by the applicant and the auditor is happy that a comprehensive verification test has been carried out, this clause and sub-clauses 2.6.1 – 2.6.2 will not be relevant.

2.6.1 These actions shall identify authorised responsible personnel to handle the remedial actions required

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance
N/A	Authorised responsible personnel have **not been** identified to handle any remedial actions.	N/A	Authorised responsible personnel are identified to handle any remedial actions. OR No non-conformities were raised during the applicant's verification test.

Additional Notes

Responsible personnel need to be identified so somebody has ownership of the corrective action.

2.6.2 All remedial actions shall be part of plan to mitigate these incidents happening again in future and shall be time specified.

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance
N/A	Remedial actions are not stated.	Remedial actions are stated, though not time specified/ or part of a plan to ensure these incidents are mitigated against in future.	Remedial actions are clearly stated, time bound and part of a plan to mitigate these incidents happening again in the future. OR No non-conformities were raised during the applicant's verification test.

Additional Notes

This should also inform improvements to the non-conforming products procedure (see clauses 1.5 and 1.6) to mitigate the risk of similar non-conformities being raised in the future.

2.7 If processing or packing / repacking occurs, records shall allow conversion rates for the finished product outputs from IFFO RS compliant Marine ingredients inputs over any given batch or time period to be calculated.

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance
N/A	No records of quantities/ volumes of products are kept to allow any conversion rates to be calculated.	Records are kept though inaccurate or not comprehensive for full range of products. Conversion rates can only be calculated accurately for a few products.	Records of quantities/ volumes of input materials and processed or packaged products are comprehensive to allow conversion rates for the finished product outputs to be calculated. The % of certified IFFO RS compliant material in the final product cannot exceed that of the input materials.

Additional Notes

For guidance on calculating conversion rates please refer to the **Volume Reconciliation** tab in supplementary spreadsheet entitled ***Traceability verification test – guidance and templates.***

If no records of quantities/ volumes have been kept, the applicant will have 3 calendar months if they are a new applicant and 1 calendar month if an existing client to ensure that they have a procedure in place to ensure that they start building up records prior to the next audit. If this is the case, this will be the focus of the subsequent surveillance audit.

2.7.1 Conversion rates for processing of the finished product that has used IFFO RS compliant marine ingredients shall be justifiable, verifiable and Accurate

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance
Conversions rates suggest that records may have falsified and/ or product adulterated.	Conversion rates have not been calculated.	There are inaccuracies in how the conversion rate has been calculated/ conversion rate is not verifiable in records kept by the applicant.	Conversion rates have been properly calculated and are verifiable.

Additional Notes

2.8 The Applicant shall conduct an annual **internal monitoring audit and complete a documented product recall test or after traceability-based complaint or incident** to ensure that their documented non-conforming product procedures as stated in 1.7 is functioning correctly and is effective.

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance
N/A	No internal monitoring audit and product recall test carried out.	The internal test reveals failings with the product recall test, and improvements to the procedure (see requirements for clauses 1.4 and 1.5) have not been carried out.	The Applicant can evidence that an internal monitoring audit and documented product recall test has been carried out. They should be able to demonstrate that the procedure is functioning correctly and would be effective should it have to be used. Any failings have been identified and rectified.

Additional Notes

This test should be carried out at least annually or after an incident.

2.9 All traceability and identification records **shall** be kept for a period of time **to correspond with the shelf life of the product, with a minimum of 3 years.**

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance
N/A	Traceability and identification records have not been kept.	Traceability and identification records have not been kept for the 3-year period. There are gaps in records.	All traceability and identification records have been kept for a minimum of 3 years.

Additional Notes

If a minor Non-Conformity is raised due to records not being maintained for a sufficiently long duration. In these circumstances, the Minor Non-Conformity will remain Minor as long as records continue to be built up. This is to reflect the impossibility of creating 3 years of records in 1 year.

If no traceability and identification records have been kept, the applicant will have 3 calendar months if they are a new applicant and 1 calendar month if an existing client to ensure that they have a procedure in place to ensure that they start building up records prior to the next audit. If this is the case, this will be the focus of the subsequent surveillance audit.

2.9.1 All records used to provide evidence of compliance to this IFFO RS CoC Standard shall be accurate, legible and unadulterated.

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance
N/A	A number of records are inaccurate/ not legible.	Occasional inaccuracies found.	All records are accurate, legible and unadulterated.

Additional Notes

2.10 The applicant shall co-operate with the Certification body and/or IFFO RS CoC Standard holder if they are asked to participate in an IFFO RS product integrity investigation by the supplying of documentary evidence within in a period of 5 days from the receipt of a request for information.

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance

N/A	The applicant refuses to co-operate and does not respond to any request for information	The applicant co-operates though is slow to respond to any request for information.	The applicant fully co-operates with the Certification Body and/ or IFFO RS should the need arise for a product integrity investigation. Documentary evidence is supplied within a period of 5 days from the receipt of a request for information.

Additional Notes

Ideally there should be a written agreement in place between the applicant and certification body as part of the certification contract.

Note- IFFO RS to add this requirement to the CoC application form

SECTION 3 – Subcontractors

3.1 Where the applicant utilises the services of a subcontractor (carrying out contract storage, processing, packing, labelling), the subcontractor shall be audited by the applicant's certification body and **shall be compliant to the requirements of the IFFO RS CoC Standard.**

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance
N/A	The subcontractor has not applied to be audited against the IFFO RS CoC Standard. Or subcontractor facilities have been audited though have failed to meet the requirements of the IFFO RS CoC Standard and any corrective actions have yet to be implemented.	The sub-contractor has been audited with only a few minor NCs raised and are being addressed with an approved action plan.	The applicant can demonstrate that subcontractor(s) facilities have been audited as part of the applicant's certification to the IFFO RS CoC Standard, and the subcontractor's facilities are in compliance with the standard.

Additional Notes:

Clauses in Section 3 will not be applicable if the applicant does not use subcontractors or the services of third-party transport companies.

If subcontractors are used, they will be part of the applicant's certification to this standard. Prior to the audit of the applicant's facilities the applicant should have requested any subcontractor(s) to will be part of the audit plan and will need to assessed for compliance against the IFFO RS CoC Standard. CoC audits for subcontractor facilities would be co-ordinated by the CB, this to ensure that the subcontracting facility has been audited and found to be compliant with the standard prior to the audit of the applicant's facilities.

Certification Requirements

In the case of a trader that buys fishmeal from an IFFO RS certified factory, a) the purchased fishmeal is kept at the storage facility of the certified plant or at a storage that has IFFO RS CoC. only paperwork is required to prove that the volume reconciliation of compliant IFFO RS material is accurate

b) the purchased fishmeal is kept in another storage facility that is not IFFO RS this will need to be audited to ensure that the IFFO RS compliant material is not being mixed with non IFFO RS material.

3.2 The applicant shall maintain an up-to-date record of the names and addresses of all approved subcontractors handling the IFFO RS compliant marine ingredients and the identity of the certified finished products.

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance
No record of subcontractors.	Some Records exist though these haven't been kept up-to-date.	All records are in place but some elements are not filled in accurately	The applicant maintains an up-to-date record of the names and address of all approved subcontractors handling IFFO RS compliant marine ingredients and the identity of the finished products.

Additional Notes

This is good practice; a record will help the applicant manage their subcontractors and keep on top of where IFFO RS compliant products are going.

3.3 If third party storage facilities are used, the applicant shall have the ability to request the IFFO RS compliant marine ingredients and the certified finished products records from subcontractor storage facilities to allow for verification at any point in time.

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance
N/A	Subcontractor won't agree to this.	This is not formally documented anywhere.	The applicant can provide evidence (such as that stated in a contract/ MOU) that the subcontractor will provide records of IFFO RS compliant materials and certified finished products should the applicant require.

Additional Notes

This would be a consideration for the applicant's product management system to take into account. So as to ensure any potential risks around using subcontractors are fully taken into account in case of a non-conforming product procedure.

3.4 The applicant shall have a signed agreement with all subcontractors that handles the IFFO RS compliant marine ingredients and the certified finished products:

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance
N/A	There is no signed agreement in place.	N/A	The applicant has a signed agreement in place with all subcontractors that handle IFFO RS compliant marine ingredients.

Additional Notes

The purpose of this agreement is to ensure that the subcontractor is clear that their operations must be in compliance with the IFFO RS CoC standard when they are handling IFFO RS products.

3.4.1 This agreement shall ensure that the subcontractor has documented systems in place to ensure full traceability, segregation, and identification of the IFFO RS compliant marine ingredients and the certified finished products at every stage of handling are to be in compliance with this IFFO RS COC Standard.

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance
N/A	This is not stated anywhere in the agreement.	N/A	The agreement specifies that the subcontractor has documented systems in place to ensure full traceability, segregation, and identification of the IFFO RS compliant marine ingredients and the certified finished products. Every stage of handling is stated to be in compliance with the IFFO RS CoC Standard.

Additional Notes

3.5 Where an applicant utilises the services of third-party transport companies an agreement or equivalent documentary evidence shall be in place demonstrating that IFFO RS certified product integrity is ensured during transportation.

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance

N/A	An agreement is not in place with the third-party transport company.	The agreement could be clearer in certain aspects to ensure integrity of the certified product is maintained.	An agreement (or equivalent documentary evidence) is in place that specifies that the transport company keeps IFFO RS certified product separated and clearly identifiable from non-certified materials. The agreement also states that the transport container is kept clean and is free from any contaminants/ materials that may affect the quality/ safety of the product being transported.
Additional Notes			

3.5.1 For bulk transported material, internal procedures and contractual agreements shall also include provisions that preclude the use of transport that may adversely affect the safety and/or integrity of any IFFO RS compliant marine ingredients materials due to the composition of a previous cargo.

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance
N/A	This is not stated in the agreement between the applicant and third-party transport company.	N/A	In the agreement it is specified that the applicant has the right to refuse transportation should this adversely affect the safety and/ or integrity of the IFFO RS compliant marine ingredients. The third-party contractor will also agree to keep the condition of transport containers clean and free from contaminants.
Additional Notes			

SECTION 4 – Use of the Certification Logo or Claim

4.1 The applicant shall only use the IFFO RS CoC certification logo or claim if it has valid certification to this IFFO RS CoC Standard.

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance
The IFFO RS logo is used/ claim made on products before the applicant's facilities have been certified.	The applicant uses the IFFO RS CoC certification logo or claim without having a valid (e.g. out of date) IFFO RS CoC certificate.	N/A	The applicant has received certification and is now eligible to use the IFFO RS logo/ make claim after receiving permission from IFFO RS to do so. If this is the initial audit the applicant has not used the IFFO RS logo/ claim on any products, and they are aware they cannot do so until they are formally certified and received permission from IFFO RS to use the logo (see requirements for clause 4.1.1).

Additional Notes

If this is first time that the applicant has applied for IFFO RS CoC certification, the IFFO RS CoC certification logo or claim can only be used on IFFO RS compliant products following the applicant receiving a valid certificate to this IFFO RS CoC Standard, **and receiving permission from IFFO-RS to do so (clause 4.1.1).**

If this is a surveillance audit and the applicant already has a valid certificate the applicant can continue to use the IFFO RS CoC logo and make claims as long as any NCs are dealt within the time limit agreed by the CB.3 calendar months if they are a new applicant and 1 calendar month if an existing client

Should a factory cease to be approved/ suspended, whether through a failure to renew the certification or a failure to meet the requirements of the IFFO RS CoC Standard, the factory and the resulting products must no longer use the logo or claim to be IFFO RS certified.

4.1.1 The applicant shall only use the certification logo or claim if it has documented evidence demonstrating that it has been granted approval to do so by IFFO RS - the standard owner.

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance

The applicant isn't yet certified though is making claims / using the IFFO RS CoC certification logo.	The applicant currently has a valid IFFO RS CoC certificate though hasn't received formal permission from IFFO RS to use the certification logo or claim.	N/A	The applicant can provide documented evidence that they have received approved from IFFO RS to use the certification logo or claim. If this is the first time the applicant has applied for IFFO RS CoC certification the applicant has not used the IFFO RS logo/ claim on any products, and they are aware they cannot do so until they have received approval from IFFO RS.

Additional Notes

The certificate holder shall provide its IFFO RS certificate number with the completed Terms and Conditions of Use. The certificate holder must allow IFFO a reasonable time to review and approve in advance all of the IFFO RS logo on print and digital materials and packing (such as advertisements, packaging, web pages, collateral materials, POS materials, and video footage).

4.2 The applicant shall follow the current IFFO RS logo guidelines for any logo used on their products.

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance
The applicant uses the logo on proven non IFFO RS products.	The applicant is not fully compliant with the terms of use for the IFFO RS logo.	The applicant is using an out of date IFFO RS logo or claim	The applicant is fully compliant with the IFFO RS logo rules.

Additional Notes

According to the IFFO RS Programmes Logo Rules and Guidelines, the certificate holder must allow IFFO RS a reasonable time to review and approve in advance all of the IFFO RS logo on print and digital materials and packing (such as advertisements, packaging, web pages, collateral materials, POS materials, and video footage).

Samples of designs and where they are intended to be placed on products before should be sent to IFFO RS for approval via email to **standards@iffors.com**. This should take no longer than 5-10 working days provided the logo rules and guidance has been followed accurately. To find out more about the logo rules and guidelines, please download the document from the downloads section.

Information on the IFFO RS logo rules can be found at www.iffors.com/iffo-rs-logo-rules.

4.3 The applicant shall operate a secure system for the production, storage and application of product labels bearing the IFFO RS CoC logo/claim to ensure that only compliant finished product are labelled as such.

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance
The IFFO RS CoC logo/ claim is found to be on non-compliant finished products.	**If the applicant is already certified and this is a surveillance audit.** There are NCs raised against clauses 1.4 – 1.6 and Section 2 that bring into question the credibility of the applicant's product management system. The production, storage, and application of product labels is not secure.	N/A	The applicant will have a documented product management system (see clauses 1.4 – 1.6) and effective traceability (see Section 2) to ensure that the IFFO RS CoC logo/ claim is only used on compliant finished products. The production, storage, and application of product labels is secure and clearly managed.

Additional Notes

This is to mitigate any risk of labelling of products by unauthorised personnel.

SECTION 5 – Staff Training and Key Representative Responsibilities

5.1 The applicant shall put in place documented programmes covering the training needs of all staff that have been identified as critical to the successful adoption of this IFFO RS CoC Standard.

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance
N/A	No training programme in place.	There is a training programme though it misses key aspects of the IFFO RS CoC standard.	There is a documented training programme and the applicant is able to demonstrate how this covers the training needs of all staff who are critical to the successful adoption of the IFFO RS CoC standard.

Additional Notes

Key staff that are critical to the successful adoption of this IFFO RS CoC Standard should be identified well in advance of the application, so as to ensure that adequate training can be provided to increase the likelihood of a successful audit.

5.1.1 These documented training programmes shall include as a minimum Identifying the staff training needs and the provision of training to ensure that the staff have the necessary competencies to meet the requirements of this standard.

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance
N/A	No training has been provided for key staff/ no plans to provide training for staff.	Some training has been provided though this could be made more comprehensive to form the basis of a training programme.	A training programme is fully documented, all key staff have been identified along with training needs. The provision of training to staff has also been documented to demonstrate that staff are competent to meet the requirements of the IFFO RS CoC Standard.

Additional Notes

5.1.2 The applicant shall review the effectiveness of all training provision on an annual basis.

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance
N/A	N/A	The applicant has not conducted an annual review of their training provision.	The applicant can demonstrate that they review the training programme on an annual basis and make improvements if necessary.

Additional Notes

This will be particularly important if there is a high turnover of staff in the organisation.

5.2 The applicant shall identify and appoint an individual (IFFO RS contact person) who shall be responsible for all contact with their certification body and for responding to any requests for documentation or information related to CoC conformity.

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance
N/A	N/A	An individual has not been formally appointed who shall be responsible for all contact with the CB.	The applicant has identified and appointed an individual who shall be responsible for all contact with the CB.

Additional Notes

Could be the person in charge of the HACCP team , but it will be up to the applicant so long as the person in charge has the authority to make changes to the processes and procedures and can give assurance that this standard is implemented effectively through all parts of the applicant's operations

5.3 The applicant's CoC key representative shall oversee the training provision review of the competencies of its staff, at least annually or after an incident.

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance
N/A	No training provision review takes place.	Training provision could be improved.	The applicant's CoC key representative can demonstrate that they oversee the training provision review of the

			competencies of key staff at least annually or after an incident.

Additional Notes

Training may be in the form of formal workshops, refresher training or coaching, mentoring or on-the-job experience.

5.3.1 Where additional training provision is required the applicant shall provide and conduct the relevant training in a time specified manner.

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance
N/A	N/A	Applicant has not provided additional training when required.	Additional training is provided in a timely manner.

Additional Notes

This is to ensure that the applicant has a plan with a timeframe to ensure it is completed before the next audit.

5.4 Record documents of all training provision completed and planned shall be maintained and be accessible.

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance
N/A	No documents detailing training provision are kept.	Documents are not adequately maintained.	Documents recording training provision completed and planned are maintained and accessible.

Additional Notes

5.4.1 An employee training record shall include as a minimum:

- The name of the trainee and signed confirmation of attendance;
- The date of the training;
- The title or course contents, as appropriate;

- The training provider.

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance
N/A	No documents detailing training provision are kept.	Training records are provided though some details are missing.	Training records provide the necessary details.

Additional Notes

5.5 The applicant shall inform their certification body within a period of 10 working days if they change their key representative member of staff and how they plan to induct a new member of staff to take over this role.

Critical Non-Conformity	Major Non-Conformity	Minor Non-Conformity	Full Compliance
N/A	There has been a staff change though the applicant has not informed the CB.	There has been a staff change, the applicant has informed the CB but not within 10 working days.	If there has been a staff change, the applicant informed the CB within 10 working days.

Additional Notes