

IFFO RS Chain of Custody Requirements for the use of subcontractor Fish Meal and Fish Oil Manufacturers

Introduction

The IFFO RS Certification programme is a third party, independent and accredited certification programme owned by the IFFO RS Governance Board. The programme certifies that fishmeal and fish oil is both manufactured responsibly and produced from fishery material supplied from responsibly managed fisheries.

The programme consists of a set of Standards applicable for fishmeal and fish oil producers and for the chain of custody of certified material through the supply chain.

There are two main components of the IFFO RS Chain of Custody (CoC) Standard:

- The verification and certification of fishmeal and fish oil factories that source their raw material from approved fisheries and by-product fisheries, or by product aquaculture material
- The verification and certification of the chain of custody for fishmeal and fish oil products that come from these IFFO RS certified factories along the value supply chain to the customer.

The key purpose of the IFFO RS CoC Standard is to provide the industry with a clear statement of requirements of how an applicant/client can gain the IFFO RS Chain of Custody Certification. Certification to the requirements under this standard will allow a successful applicant/client to use the certification mark “IFFO RS CoC Assured” to signify compliance to the IFFO RS CoC Standard as part of the IFFO RS programme. Commitment to these requirements will communicate to the applicant/client’s customers the provenance and authenticity of IFFO RS certified fishmeal and fish oil they supply.

IFFO RS CoC Certification Model for Subcontractor Fishmeal and Fish Oil Manufacturing Sites- Identity Preserved (IP)

Definition

The Identity Preserved (IP) supply chain model assures that the IFFO RS certified fish meal and fish oil and its derivatives delivered to the end user is uniquely identifiable to the fish meal factory and its raw material and is kept physically isolated from all other fish meal and fish oil sources throughout the supply chain.

Explanation

The IP supply chain model requires that the mill, refiner/feed manufacturer, and **all legal owners** of the IFFO RS material throughout the supply chain maintains full separation and full traceability through to the delivery point at the end user. The end user will be assured that all of the physical fish

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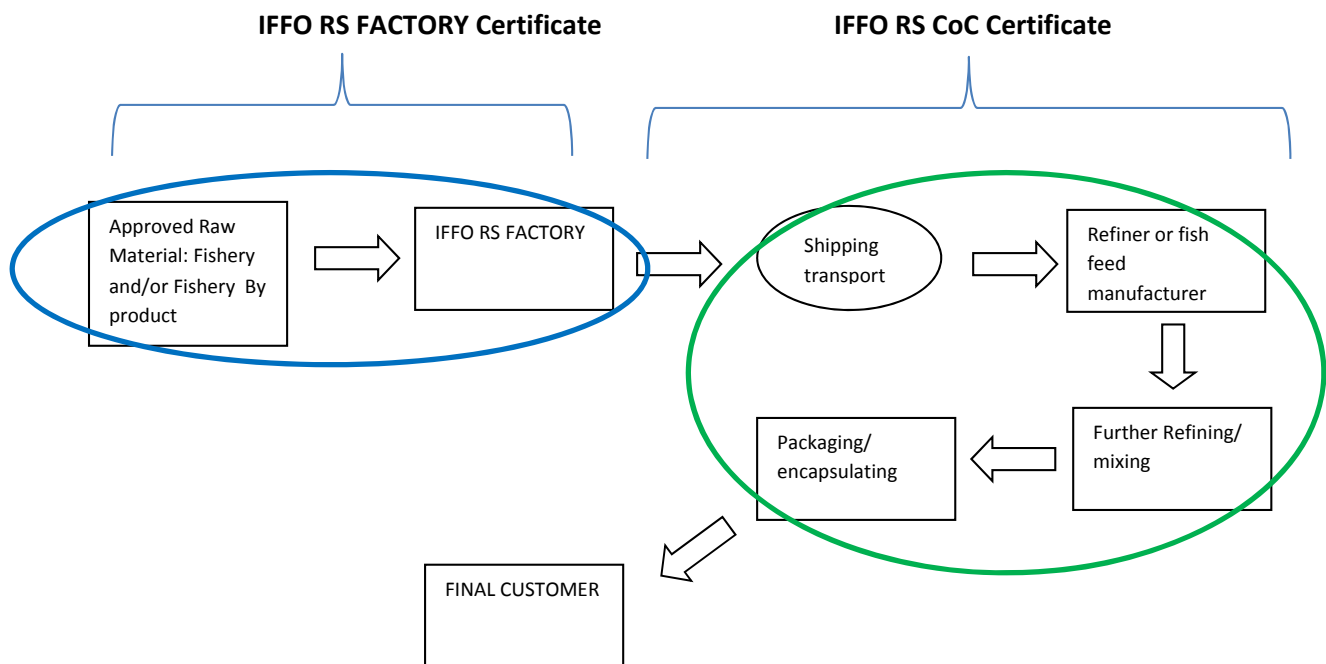
meal and oil received has come from a uniquely identifiable IFFO RS certified factory and meets all of the required elements of the certification program

This document describes the requirements necessary for an IFFO RS CoC applicant/client to comply with and become successfully certified to this standard; to be able to offer the same level of assurance and credibility to their customers, if one or more of their supplying fish meal and fish oil manufacturing plants is **not wishing to gain certification** in their own right to the IFFO RS Factory Standard. The most important point to note is that irrespective of the certification state of the supplying fish meal and fish oil manufacturing site is that, it must meet the same exacting standard of the IFFO RS factory standard prior to any claim being able to be made by the IFFO RS CoC applicant/client.

Scope

This documented procedure only covers those IFFO RS Chain of Custody certifications where the fishmeal and fish oil manufacturing plant is deemed to be a subcontractor to the applicant/ client and describes in detail the steps that the applicant/client’s certification body will need to undertake to ensure that the integrity and robustness of the third party certification requirements of the IFFO RS programme are maintained and adhered to.

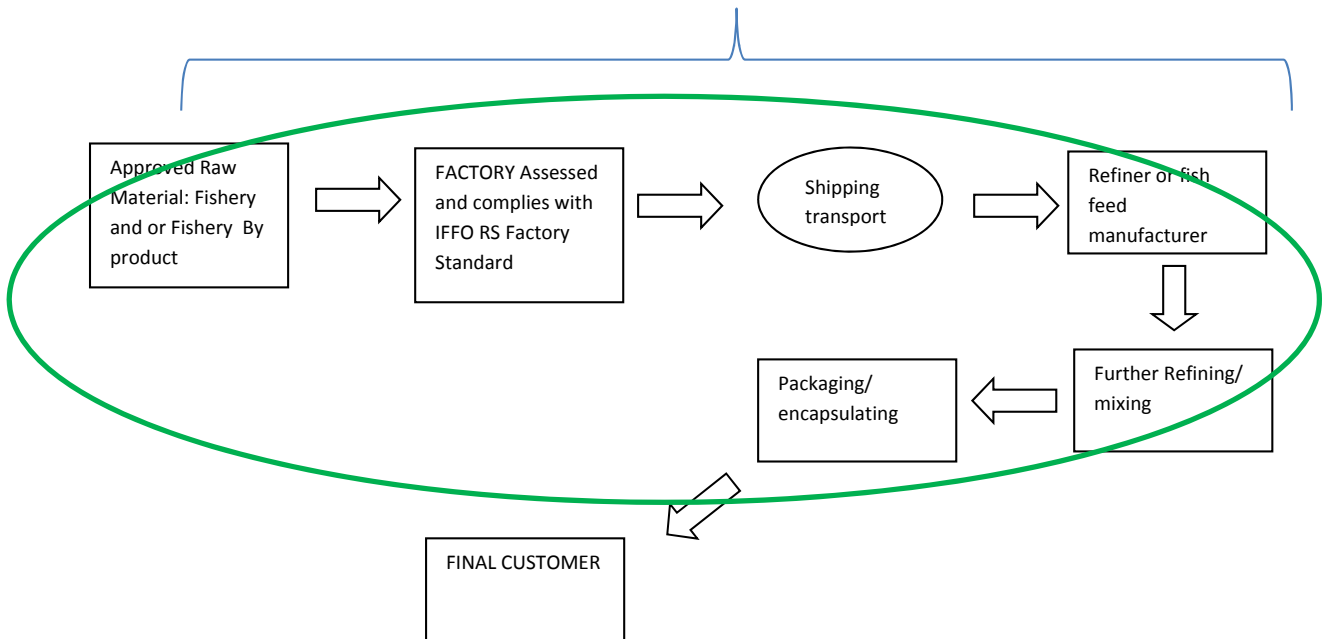
Standard Fish Meal and Fish Oil Supply Chain IFFO RS Certification Model



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Subcontractor Fish Meal and Fish Oil manufacturer Supply Chain IFFO RS Certification Model

IFFO RS CoC Certificate



Definitions

Chain of Custody (FAO derived Definition):

The set of measures which is designed to guarantee that the fishmeal and fish oil product put on the market and bearing the IFFO RS logo is really a product of designated origin and coming from the certified factory concerned. These measures thus cover both the tracking/traceability of the product all along the processing, distribution and marketing chain, as well as the proper tracking of the documentation and control of the quantity concerned.¹

Applicant: A company or group of companies in the supply chain that has **formally** applied to meet the Chain of Custody Standard through the formal Application Form.

Certified Applicant: An Applicant company or group of companies in the supply chain that have been formally Certified by the Certification Body as meeting the Chain of Custody Specification.

IFFO RS Subcontractor: A supply chain actor contracted by the certificate holder to carry out specific tasks. The Subcontractor is an entity that is contracted by the IFFO RS applicant/client to carry out work for them and includes all stages in the supply chain from manufacturer, distribution companies and any other storage facilities used for the certified IFFO RS Fish Meal and Fish Oil.

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Supply Chain Actor: a supply chain actor is an entity that operates within the supply chain and, generally, takes ownership of the product. All supply chain actors need to be registered and the scope of their activities will determine if they need to be assessed against the IFFO RS Standard requirements

Legal ownership: The right to possession and the power to convey those rights over the IFFO RS certified material. Ownership can be in the form of a signed contract or other binding agreement that establishes the relationship between the fishmeal and/ fish oil and the supply chain actor. Ownership thus begins with such a binding agreement and does not necessarily require physical arrival of shipment.

Procedure Applicability

Requirements in this procedure that apply to IFFO RS CoC applicants/clients that use subcontractor fishmeal and fish oil manufacturing sites to ensure that these plants are approved and meet the requirements of the IFFO RS Factory Standard in its entirety prior to being certified to the IFFO RS CoC Standard.

Sub-Contractor Manufacturer IFFO RS Factory Approval Requirements Procedure

1.1 The IFFO RS CoC applicant/client shall apply to their certification body prior to use of a new subcontractor fishmeal and fish oil manufacturing site.

1.2 If an applicant/client uses fish meal and fish oil manufacturing subcontractors the applicant/client shall have a signed contract with all those subcontractors that require the subcontractor to:

1.2.1 Comply with all requirements of the IFFO RS Factory Standard.

1.2.2 Allow the certification body and if required the certification body’s accreditation body access to the subcontractor’s manufacturing site to undertake a full IFFO RS Factory audit to ensure full compliance with the IFFO RS Factory Standard.

1.2.3 Ensure that all non-compliances raised during an IFFO RS Factory audit of the manufacturing site are closed off correctly to be in full compliance with the requirements of the IFFO RS Standard

1.2.4 All raw fish materials used in the production of IFFO RS compliant fishmeal and fish oil shall only be sourced from fisheries or by product fisheries that have been approved to the IFFO RS Standard.

1.2.5 The sub-contractor shall inform the IFFO RS CoC applicant/client immediately once an issue have incurred that has resulted in **non IFFO RS compliant material being supplied** to the client this will include, but is not limited, to the following:

- No approved IFFO RS raw fish material available for manufacture.

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- Approved IFFO RS raw fish material is mixed with non-approved raw fish material during the manufacturing process of the fish meal and fish oil.
- The compliant IFFO RS fishmeal and/or fish oil is mixed with non-compliant fishmeal and/or fish oil during the storage and despatch operations to the IFFO RS CoC applicant/client.
- The manufacturing site is not certified to a standard that is recognised by the IFFO RS standard for Good Manufacturing Process.
- The manufacturing site has its legal licence to operate removed by its national regulatory authority.

1.3 The IFFO RS CoC applicant/client will maintain up to date records of all the sub-contractor manufacturing sites used, including their name and address, the nature and conditions of the contract and all relevant records of all approved IFFO RS raw fish materials associated with the subcontractor.

1.4 The IFFO RS CoC applicant/client shall inform the subcontracted fishmeal and fish oil manufacturer that it will be audited onsite by the IFFO RS CoC applicant/client’s certification body **prior to** it being allowed to be used as an approved site for the production of the IFFO RS compliant fishmeal and fish oil.

1.4.1 The frequency of audit for the sub-contracted fishmeal manufacturing site will be in compliance with the most up to date version of the IFFO RS Standard.

1.5 The IFFO RS CoC applicant/client shall conduct a mass balance evaluation for each non-certified IFFO RS contracted fishmeal and fish oil manufacturer to establish how much compliant material is sourced from each subcontractor manufacturing site.

1.5.1 In addition, the contracted IFFO RS manufacturer will be required to keep records of all the approved raw material it processes and non-approved raw material it processes, if applicable, to allow the certification body to cross check and confirm with the IFFO RS applicant/client’s own records.

1.6 The IFFO RS CoC applicant/client will provide details of all packaging that incorporates the IFFO RS CoC logo or makes any reference to the IFFO RS certified status of the fish meal or fish oil produced, received and/or sent to the subcontracted fishmeal and fish oil manufacturer

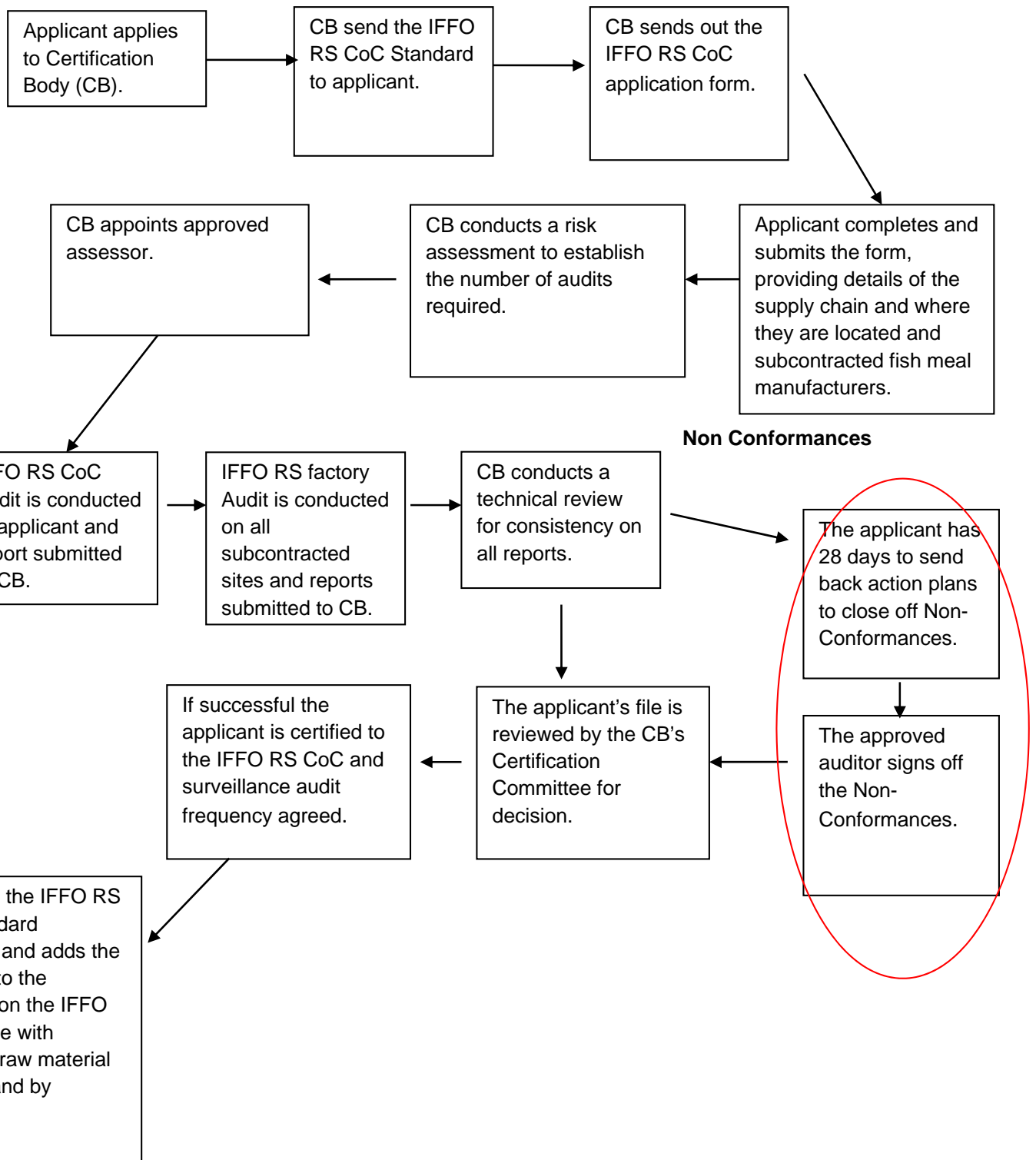
IFFO RS CoC Certification Requirements

The IFFO RS applicant/client will need to be audited to the full IFFO RS CoC Standard to ensure that all internal controls, to protect the providence of the IFFO RS certified fishmeal and fish oil are robust and are being maintained. Prior to any successful certification all non-compliances raised by the certification body’s auditor will need to be closed off before the applicant/client can be certified/recertified to the IFFO RS CoC Standard.

The following certification process is highlighted in the following diagrammatic representation

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How will an IFFO RS CoC Applicant/Client will be processed and certified?



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