17. PROCESS REQUIREMENTS

17.1 Unit of Certification (UoC)

17.1.1 The UoC shall be limited to a single ASC (species) standard.

17.1.1.1 A client may hold multiple certificates, each for a different ASC species standard.

a) No farm or site may have more than one valid certificate at the same time for the same ASC standard.

17.1.1.2 The CAB may combine audits for more than one ASC species standard.

a) The CAB may combine initial certification audit(s) with surveillance or re-certification audits(s).

17.1.2 Organisations seeking certification shall have been in operation for no less than eighteen months (18) or one harvest cycle as defined in the standard(s), whichever is less.

17.1.2.1 All clients seeking certification shall have available records of performance data covering the periods of time specified in the standard(s) against which the audit(s) is to be conducted.

17.1.3 The CAB shall determine the unit of certification as either:

17.1.3.1 A single site operation that has all of the following elements:

a) The applicant is capable of signing a binding contract that is legally enforceable;

b) A single site may include multiple pens, cages, ponds, raceway systems or beds.

17.1.3.2 A multi-site client shall have all of the following elements:

a) The applicant is a legal entity.

b) The applicant has a central office that:

i. Is designated as the central office by the client;

ii. Is responsible for the management of and conformity to ASC requirements for the unit of certification;

iii. Is responsible for the oversight and implementation of the organisation's internal management system which shall include written procedures that ensure conformity to ASC requirements including:

A. Document control procedure;

B. Record keeping and retention procedure;

C. Procedure for managing changes to ASC requirements;

D. Procedure for conducting annual management reviews;

E. Procedure for managing complaints submitted to Management by stakeholders and staff members as per specified in the applicable (farm) standard;

F. Procedure for the evaluation and implementation of corrective and preventive actions;

G. Procedure for conducting root cause analyses for non-conformities, and for addressing identified root causes;

H. Procedures to ensure compliance with legal requirements;

I. Procedures for conducting an annual internal audit, covering ASC requirements;

J. Procedures for planning for and evaluation of the results of internal audits;

K. Procedures for the scheduled reporting of performance of management systems and sites;

L. Procedures for identifying and segregating all products within each site, among sites within the unit of certification, and products that are not included in the unit of certification.

1. The procedures shall describe how certified products are identified and segregated to prevent mixing with non-certified before the start of the MSC/ASC certified chain of custody.

2. The procedures shall describe the conditions under which products must be segregated, and measure to prevent mixing directly or indirectly.

3. The procedures and associate records shall allow products to be traced back from the start of the MSC/ASC certified chain of custody back to the production unit (i.e. cage/net/pen/pond/tank/ raceway).

4. If the unit of certification has a separate MSC/ASC Chain of Custody (CoC) certificate[2], these requirements (17.1.3.2.b.iii.L and 17.1.3.2.b.iii.L.2-3) shall not apply.

M. Procedures for traceability of inputs used for each site as specified in the standard being audited to.

iv. Is subject to an annual management review

v. Is subject to and included in an annual internal audit.

[2] Separate MSC/ASC CoC certificate for products within the unit of certification. This is different from the CoC certificate for the processing facility that may belong to the same legal entity and may process the raw materials coming from the unit of certification.

A. A full internal audit shall have been completed before an external ASC onsite audit may begin.

1. The internal audit shall include all relevant ASC requirements at all sites and the central office.
   1) Some social requirements may be excluded from internal audits to maintain worker confidentiality.
   2) The exclusions shall be accepted by the CAB and documented in the audit report.
2. Classification and treatment of internal audit findings may follow the rules for external audit findings (see 17.10).
3. Internal auditors shall be competent in ASC requirements as described in Annex B.

vi. Has the authority to require compliance of all sites and operations included in the unit of certification.

A. All sites shall have a legally binding link (i.e. direct ownership, or contract) with the multi-site certificate holder or multi-site applicant.

B. Subcontracted farms may be included in the unit of certification if all the following apply:

1. All of the operations of the farm are subject to the same procedures as the rest of the unit of certification;
2. The product produced by the subcontractor is owned by the certificate holder; and,
3. The central office has the same oversight and right to control over the operations of subcontractors as it has for the client's own operations.
4. All of the operations of the subcontracted farms shall be included in the multi-site certificate.
5. The contract shall be transparent, mutually accepted by both parties and include the above provisions (17.1.3.2.b.vi.B.1-4).
   1) Contract farming arrangements with subcontracted farms should follow the FAO "Guiding principles for responsible contract farming operations"[3].

3 Guiding principles for responsible contract farming operations, Rural Infrastructure and Agro-Industries Division (AGS) Food and Agricultural Organisation of the United Nations (FAO), Rome, Italy, 2012

2) If the (farm) standard being audited to contains indicator(s) for contract farming, this requirement (17.1.3.2.b.vi.B.5) shall not apply.

vii. Can demonstrate its ability to collect and analyse data from all sites, operations and the central office included, in the unit of certification including:

A. Data required to demonstrate conformity with ASC requirements, and

B. Implementation of corrective and preventive actions.

viii. Can demonstrate its ability to implement organisational change if required.

ix. Monitors compliance to all relevant ASC requirements of all sites within the unit of certification.

x. Notifies the CAB of any non-conformities against applicable local regulations that are relevant to the ASC scope of certification within three (3) days of detection.

c) All sites in the unit of certification shall operate within the same jurisdiction or within neighbouring jurisdictions that share the same relevant regulations.

d) All sites shall:

i. Be subject to the same (farm) standard;

ii. Comply with the (farm) standard individually; and

iii. Have the same or similar production system[4].

A. If different production systems are used, each production system shall be evaluated separately using the sampling methods described in Annex E.

e) All conformity assessment services shall conform to the requirements in this document as specified in Annex E.

17.1.3.3 A multi-site client may opt to have all sites in the unit of certification audited in each initial, surveillance and re-certification audit.

a) This decision shall be documented in the audit report.

b) The following provisions under 17.1.3.2 shall not apply:

i. 17.1.3.2.b.iii.A-D
ii. 17.1.3.2.b.iii.F-K

4 See Funge-Smith, S. Phillips, M.J. 2001. Aquaculture systems and species. In R.P. Subasinghe, P. Bueno, M.J. Phillips, C. Hough, S.E. McGladdery & J.R. Arthur, eds. Aquaculture in the Third Millennium. Technical Proceedings of the Conference on Aquaculture in the Third Millennium, Bangkok, Thailand, 20-25 February 2000. pp. 129-135. NACA, Bangkok and FAO, Rome. http://www.fao.org/docrep/003/AB412E/ab412e07.htm

iii. 17.1.3.2.b.iv-v
iv. 17.1.3.2.b.vii-ix

17.1.3.4 The CAB shall determine UoC for processors according to the MSC/ASC Chain of Custody (CoC) standard and related certification requirements.

a) If the unit of certification is multi-site or group, it must be within the same jurisdiction.

17.2 Notice of audit

17.2.1 The CAB shall use FORM 3 to inform the ASC and the ASC appointed accreditation body of planned audit dates no less than thirty (30) days prior to the audit.

17.2.1.1 For unannounced audits FORM 3 may be submitted to the ASC fewer than thirty (30) days prior to the audit.

17.2.2 The CAB shall publish the information contained in FORM 3 on its website within three (3) days of submitting it to ASC.

17.2.2.1 ASC shall not publish FORM 3 prior to an unannounced audit.

17.2.3 The CAB shall provide updates to FORM 3 within 5 days of any changes to the information

17.2.3.1 If the changes are to occur before a planned audit, the changes shall be no less than 10 days before the audit is scheduled to begin

17.2.3.2 All changes will be clearly identified on the revised FORM 3.

17.2.3.3 The ASC should publish a public notice of the planned audit within three (3) days of receiving FORM 3.

17.2.3.4 This requirement shall apply for all on-site audits

17.2.4 The CAB shall notify potential stakeholders and interested parties of the planned audit and invite their participation.

17.2.4.1 The CAB may choose to notify none, some or all potential stakeholders and interested parties prior to an unannounced audit.

17.2.4.2 The notice shall be in the local language(s) and English.

17.3 Audit methodology

17.3.1 The ASC audit shall use the *ASC Audit Manual* as guidance for the standard(s) for which the client is being audited.

17.3.2 ASC reserves the right to develop, and implement and require CABs to use their own audit tools and methodology for the ASC aquaculture audits covering areas not specified in this document.

17.3.3 The CAB shall conduct a Desk Review (Annex F) based on information and documents provided by the client to inform its Social Audit Risk Assessment (Annex G) and audit planning prior to the on-site audit (see 7.2.0).

17.3.4 The CAB shall consider outcomes of the Desk Review and Social Audit Risk Assessment to determine audit effort for each type of UoC. This includes (but is not limited to):

17.3.4.1 Number of worker interviews, and types (individually or in group).

a) The number of interviews with management and staff functions shall come in addition to the number of worker interviews calculated in the Social Audit Risk Assessment tool.

17.3.4.2 Visit to relevant local stakeholders to corroborate evidence, if necessary.

17.3.4.3 Visit to workers' living quarter if provided to workers by the UoC and/or certificate holder.

17.4 Audit Timing

17.4.1 The CAB shall not conduct an on-site audit until the client has submitted all required information and documentation, and that the CAB has completed the Desk Review (See 7.2.0.1).

17.4.2 The CAB's initial audit should include harvesting activities of the principle product to be audited.

17.4.3 If other products are included but not harvested at the same time, the CAB shall collect evidence of compliance for all products to be added to the certificate.

17.4.4 If product handling or processing is included, the audit should be conducted to occur at the time that the handling or processing facilities are operating.

17.4.5 Audits shall not be conducted until sufficient records/evidence are available for all applicable standard requirements as the minimum.

17.4.6 If the CAB determines that it is not possible to conduct the initial audit as specified in 17.4.2, the CAB shall:

17.4.6.1 Record this determination in the audit report.

17.4.6.2 Provide a justification for the alternative timing.

17.4.7 An audit conducted during the harvesting of the principle product included for certification shall occur at least once during the validity of each certificate.

17.5 Audit duration

17.5.1 The CAB shall determine the minimum planned duration of the audit, taking into account, when applicable, evaluation of traceability risks and eligibility to enter further chain of custody.

17.5.2 The CAB shall record this determination and the justification for it in the audit report.

17.5.2.1 The following factors may be considered, as the minimum, for determining duration of an audit:

a) Desk Review time is accounted for in the total audit duration;

b) Initial audit preparation takes into account audit planning, stakeholder consultation and preliminary study (See 7.2.0.1.b);

c) The time spent by any team member that is not assigned as an auditor (i.e. technical experts, translators, interpreters) shall necessitate additional time;

d) The time spent for familiarisation with all required information under 16.1.2 for auditor(s) performing audits in countries they do not belong to;

e) The time spent for the activities during the on-site audit;

f) The time spent for other activities (e.g. reporting, traveling, closing non-conformities) as deemed necessary.

17.6 Determining the start of the chain of custody

17.6.1 For the following risk factors, the CAB shall document whether each risk is currently or potentially applicable. This shall include:

17.6.1.1 The possibility of mixing or substitution of certified and non-certified product, including product of the same or similar appearance or species, produced within the same operation.

17.6.1.2 The possibility of mixing or substitution of certified and non-certified product, including product of the same or similar appearance or species, present during production, harvest, transport, storage, or processing activities.

17.6.1.3 The possibility of subcontractors being used to handle, transport, store, or process certified products.

17.6.1.4 Any other opportunities where certified product could potentially be mixed, substituted, or mislabelled with non-certified product before the point where product enters the chain of custody.

17.6.2 For each applicable risk, the CAB shall:

17.6.2.1 Clearly document the risk, and

17.6.2.2 Describe any traceability, segregation, or other systems in place to manage the risk.

17.6.3 The CAB shall review and document, in detail, the flow of certified product within the operation and the associated traceability system which allows product to be traced from final sale back to the unit of certification.

17.6.4 This shall include the traceability documentation at each stage of handling certified product and how product can be linked from each document (e.g. through batch codes, lot codes, etc.).

17.6.5 This shall also include a detailed description of the systems used to segregate and identify certified product at each stage of handling.

17.6.6 Based on the results found from 17.6.1 -17.6.5 above, the CAB shall determine whether:

17.6.6.1 The traceability and segregation systems in the operation are sufficient to ensure all products identified and sold as certified by the operation originate from the unit of certification, or

17.6.6.2 The traceability and segregation systems are not sufficient and a separate chain of custody certification is required for the operation before products can be sold as ASC-certified or can be eligible to carry the ASC logo.

17.6.7 This determination shall remain in force until revised by the CAB in a subsequent audit or until a valid CoC certification is in place.

17.6.7.1 The CAB shall inform the client if any separate CoC certification for the operation required in 17.6.6.2, client shall be subject to an audit by the same CAB that carried out the farm certification.

17.6.8 If the CAB has determined that any risk factors in 17.6.1.1 or 17.6.1.2 or 17.6.1.4 are applicable, a separate chain of custody certification shall be required.

17.6.8.1 A separate chain of custody may be determined to be unnecessary if the CAB determines that the traceability and segregations systems in place are sufficient to address the risks, and

17.6.8.2 The reason for a determination that a separate chain of custody certification is unnecessary shall be clearly documented in the audit report.

17.6.9 The CAB shall clearly document in the Audit Report the determination under 17.6.6, including a statement confirming whether products are eligible to enter further chains of custody.

17.6.10 If the CAB has determined under 17.6.6.1 that the traceability systems are sufficient to allow products to enter chain of custody, the CAB shall document:

17.6.10.1 The intended point of first sale.

17.6.10.2 The point from which chain of custody is required to begin.

17.7 Setting the Eligibility Date for under-assessment product

17.7.1 During the farm audit the CAB shall determine the specific date (Eligibility Date) from which product from the operation is eligible to be sold as ASC-certified or with the ASC logo.

17.7.2 The Eligibility Date can be set as either:

17.7.2.1 The date from which all major non-conformities have been verified as closed and a corrective action plan to address all minor non-conformities has been approved, or

17.7.2.2 The date of farm certification as specified on the certificate.

17.7.3 The Eligibility Date shall be set as the date of farm certification for applicants where under 17.6.6.2 a determination has been made that the operation requires a separate Chain of Custody certification. The CAB shall:

17.7.3.1 Record this Eligibility Date clearly in the audit report.

17.7.3.2 Communicate this date to the client and the ASC within five (5) days.

17.7.4 If the Eligibility Date is set before the certification date, the CAB shall inform the applicant that:

17.7.4.1 All under-assessment product harvested after the Eligibility Date must be fully traceable back to the unit of certification and harvest date.

17.7.4.2 All under-assessment product(s) must be clearly identified and segregated from certified and non-certified product.

17.7.4.3 The certificate holder shall not sell or apply the logo to under-assessment product as certified or with ASC trademarks until:

a) The farm has been certified and the certificate issued by the CAB, and

b) There is a signed logo licence agreement between the client and ASC if the ASC logo is to be used.

17.8 Stakeholder engagement

17.8.1 The CAB shall maintain an up-to-date list of all stakeholders that are relevant to be contacted for their input per species.

17.8.1.1 The CAB shall contact all stakeholders that are relevant for the scope and objectives of the audit.

17.8.1.2 Independent initial stakeholder consultation shall be performed at the initial planning stage, between Desk Review and on-site audit.

a) This stakeholder consultation may be carried out remotely.

17.8.1.3 In cases where the identified stakeholders are single entities or persons, the CAB shall maintain on records contact details and date of consultation with the stakeholder.

17.8.2 The CAB shall keep a list of all stakeholders and interested parties who indicate an interest in making a submission to the audit team.

17.8.3 The CAB shall acknowledge receipt of all written submissions.

17.8.3.1 Verbal submissions and how they have been addressed shall be clearly explained in the audit reports.

17.8.4 Prior to the publication of the draft audit report, the CAB shall respond in writing to each stakeholder and interested party to explain how their comments were addressed by the audit team.

17.8.5 The CAB shall have a mechanism that allows comments to be submitted at any time during the validity of the certificate, and that specifies how those comments are to be taken into consideration for the next coming audit.

17.8.5.1 The CAB shall make sure that the mechanism is known to the public.

17.8.5.2 The CAB shall retain all records related to stakeholder engagement of each audit for the entire time when the UoC is the CAB's client; and for 3 years, as a minimum, after the CAB stops providing certification services to the client.

17.9 Audit Evidence

17.9.1 Audit evidence relevant to the audit objectives, scope and criteria, including information relating to interfaces between functions, activities and processes shall be collected by appropriate sampling and shall be verified.

17.9.2 Only information that is verifiable may be audit evidence.

17.9.2.1 Audit evidence may be in the form of pictures, multimedia, notes, and other means.

17.9.3 The CAB shall record all audit evidence in the audit report.

17.10 Audit Findings

17.10.1 CABs shall classify non-conformities as minor, major or critical as follows:

17.10.1.1 **A minor non-conformity**

a) For initial certification, the CAB may recommend the applicant for certification once an action plan to address minor non-conformity(ies)

i. Has been agreed to by both the client and the CAB.

A. The action plan shall include a brief description of:

1. The root cause(s) of the non-conformity

2. The corrective action(s) to be taken is intended to satisfactorily address the non-conformity

ii. Has been implemented.

iii. Within (3) three months the CAB shall:

A. Confirm receipt of objective evidence that demonstrates that a satisfactory corrective action plan has been finalized.

B. Confirm receipt of objective evidence that demonstrates that the corrective action plan has been implemented.

C. Close the minor non-conformity once it can confirm receipt of objective evidence that demonstrates conformity.

1. Minor non-conformities may be extended once for a maximum period of one (1) year if on-site verification is necessary to confirm conformity.

2. If an extension is granted, the CAB shall have confirmed receipt of sufficient objective evidence that demonstrates conformity such that it is satisfied that all efforts have been made or are being made by the client to demonstrate conformity.

3. If an extension is approved by the CAB, it shall be justified in the next audit report.

b) The CAB should raise a major non-conformity where minor non-conformities are repeatedly raised against a particular requirement.

c) The CAB shall raise the minor non-conformity to a major non-conformity if any of the above deadlines are not met.

17.10.1.2 **Major non-conformities**

a) The CAB shall require that major non-conformities shall be satisfactorily addressed by an applicant:

   i. Prior to certification being granted.

   ii. Within three months of the date of the audit or a full re-audit shall be required.

   iii. That the root cause of the non-conformity is identified and addressed.

b) The CAB shall determine whether or not an on-site visit is needed to close the major non-conformity.

c) The decision, justification and conclusion shall be made clear in the final audit report.

d) In the case of a major non-conformity raised during the period of validity of a certificate, the CAB shall require:

   i. That the certificate holder satisfactorily addresses the non-conformity within a maximum of three (3) months

   ii. Major non-conformities may be extended once for a maximum period of three months if the CAB has confirmed receipt of sufficient objective evidence that demonstrates conformity was not possible due to circumstances beyond the control of the client.

      A. Extensions of major non-conformities shall be clearly documented along with a clear justification in the audit report.

   iii. That objective evidence is confirmed by the CAB that:

      A. The root cause of the non-conformity is identified,

      B. An action plan is agreed with the CAB,

      C. That the action plan is implemented and

      D. That conformity can be demonstrated.

e) The CAB shall decide if an on-site audit is required to close out the major non-conformity(ies).

f) The CAB shall suspend the certificate if a major non-conformity remains open after six (6) months and follow requirement in Section 7.6 of this document.

17.10.1.3 Critical social non-conformity

a) The CAB shall issue a critical non-conformity when either
   i. Workers' lives are evidently at risk, or
   ii. A critical indicator specified in the ASC standard is not met.

b) The CAB shall require that critical non-conformities shall be satisfactorily addressed by an applicant:
   i. Prior to certification being granted;
   ii. Within one month of the detection date or a full re-audit shall be required;
   iii. That the root cause of the non-conformity is identified and addressed.

c) The CAB shall conduct an on-site visit to close the critical non-conformity.

d) The decision, justification and conclusion shall be made clear in the audit reports.

e) In the case of a critical non-conformity raised during the period of validity of a certificate, the CAB shall:
   i. Suspend the certificate at the end of the audit;
   ii. Close the critical non-conformity within a maximum of one (1) month of the detection date. This shall include:
      A. Acceptance of root cause analysis (RCA) and corrective actions based on the RCA submitted by the unit of certification;
      B. Verification of corrective actions implemented by the UoC:
         1. On-site verification as deemed necessary;
         2. Conformity can be demonstrated.
   iii. Withdraw the certificate if the critical non-conformity is not closed on completion of the one (1) month period.
      A. An extension of 15 calendar days shall be granted to close out the critical non-conformity in exceptional cases;
      B. Extension of time and justification to close critical non-conformities shall be documented in the audit report.

17.10.2 All non-conformities shall reference the relevant section of the ASC standard or other ASC requirement as relevant to the audit.

17.10.3 The CAB shall not include evidence of more than one non-conformity into a single documented non-conformity report unless they apply to the same ASC requirement.

17.10.4 Non-conformities shall not be downgraded (from critical to major, or from major to minor non-conformities).

17.10.5 The CAB shall assess the effectiveness of the corrective and/or preventive actions in addressing the root cause of the non-conformity taken before closing out a major or minor non-conformity.

17.11 Certification Decisions

17.11.1 The CAB shall only make certification decisions based on the evaluation of the audit evidence as to whether or not the applicant is in conformity with the requirements of the applicable ASC Standard(s) and these Certification Requirements.

17.11.1.1 Audit evidence shall be no more than six (6) months old.

17.11.2 The CAB shall consider all audit evidence when taking certification decisions.

17.11.2.1 This shall include audit evidence gathered prior to, during and after an on-site audit.

17.11.2.2 This shall include audit evidence gathered as the result of information submitted by stakeholders and interested parties.

17.11.3 The CAB shall post all certification decisions, including changes in scope, suspensions, cancellation and withdrawals on the ASC database.

17.11.4 If the ASC database is offline, the CAB shall inform the ASC within ten (10) days of the decision.

17.11.5 The CAB shall issue certificates with a maximum validity period of three (3) years from the date of issue.

17.12 Audit Report Requirements

17.12.1 ASC audit reports shall follow the format and requirements presented in Annex C

17.13 Content of Certificates

17.13.1 The CAB shall issue an English language certificate, which as well as the requirements in ISO 17065 7.7 shall contain:

17.13.1.1 The ASC logo, which shall be no smaller than the logo of the CAB.

17.13.1.2 A unique certificate number

a. An issue number (for re-issued or renewed certificates)

17.13.1.3 The point at which certified products may enter a Chain of Custody

a) This can be skipped for a certificate only covering the social scope of a CoC Unit of Certification.

17.13.1.4 The date of issue of the certificate

a) The date of issue shall be the date the certificate was registered on the ASC database.

b) Registration shall not be complete until all information specified on the ASC database has been posted on the ASC database.

17.13.1.5. The date of expiry

17.13.1.6. The name and address of the CAB

17.13.1.7. The legal name and registered address of the certificate holder plus

17.13.1.8. Any trade names and other addresses that will be used for sales invoices

17.13.1.9. The name and physical address of any additional sites included in the unit of certification

17.13.1.10. A description of the scope of the certificate, including a general description of the type of products covered by the certificate, a reference to the specific standard(s) against which the certificate holder has been evaluated, and confirmation of full or partial certification.

17.13.1.11. A reference to the ASC database of registered certificates (specific URL to be announced) for the full list of product groups covered by the certificate

17.13.1.12. A clear statement to the effect that the certificate shall remain the property of the CAB that issued it, and that the certificate and all copies or reproductions of the certificate shall be returned or destroyed if requested by the CAB

17.13.1.13. The date of expiry of the certificate together with the disclaimer “The validity of this certificate shall be verified on [specific URL to be announced]”.

17.13.1.14. The signature of the individual(s) that the CAB assigned this responsibility.

17.13.1.15. A disclaimer stating: "This certificate itself does not constitute evidence that a particular product supplied by the certificate holder is ASC-certified. Products offered, shipped or sold by the certificate holder can only be considered covered by the scope of this certificate when the required ASC claim is clearly stated on invoices and shipping documents".

17.13.2. The CAB may issue certificates in other languages as well as the English version providing they bear a disclaimer in at least 10 point font that the certificate is an unverified translation of the English certificate, and in case of differences the English version shall take precedence.

17.14 Information for Certificate Holders

17.14.1. The CAB shall inform the certificate holder that it has the right to claim that, subject to the scope of its certificate, its operation is certified in accordance with the specific ASC standard covered.

17.14.2. The CAB shall inform the certificate holder that:

17.14.2.1. It may claim that its aquaculture products are the result of “Responsible Aquaculture Farming” or “Responsibly Produced”.

17.14.2.2. It is eligible to apply for an ASC logo licensing agreement.

17.14.2.3. It shall not make any claim about ASC certification on consumer facing products without a valid ASC logo licence.

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17.15 Surveillance

17.15.1. The CAB shall carry out a surveillance audit to monitor the certificate holder's continued conformity with applicable ASC standards and other certification requirements at least annually.

17.15.2. Public notice of surveillance audits shall use Form 3.

17.15.3. Surveillance reports shall conform to Annex C.

17.15.4. During the three-year term of the certificate the CAB shall plan and conduct surveillance audits in such a way that all aspects of the production cycle are audited

17.15.4.1. Unless the life-history of the cultured species does not allow for this.

17.15.4.2. For social aspects, the CABs shall follow instructions included in the Social Audit Risk Assessment for surveillance audits (Annex G).

17.15.5. Stakeholder consultation may be undertaken during surveillance audits.

17.15.6. The CAB shall conduct no fewer than 2 surveillance audits for any valid certificate.

17.15.7 The CAB shall appoint an audit team with expertise that is comparable to the original audit team when conducting surveillance audits.

17.15.7.1 If team members are different to the original team, the selection of individuals to conduct audits shall be justified in writing in the surveillance audit report and their relevant skills and/or expertise documented.

17.15.8 The CAB shall document and implement clear procedures for the conduct of surveillance audits that conforms to these requirements.

17.15.9 The CAB shall assess:

17.15.9.1 Progress and performance against outstanding non-conformities.

17.15.9.2 The CAB shall document conformity with, and progress and performance against, outstanding non-conformities using the form of the original non-conformity.

17.15.9.3 In the event that an outstanding non-conformity is changed, the CAB shall provide written justification for the change in the surveillance report.

17.15.10 The management system including:

17.15.10.1 Changes to the management system.

17.15.10.2 The capacity of the management system to manage any change in scope, size or complexity within the certified unit.

17.15.10.3 Legal and regulatory compliance.

17.15.10.4 This shall include any changes that have occurred in legislation or regulations.

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17.15.10.5 Any complaints or allegations of non-conformity with ASC requirements.

17.15.10.6 A sample of sites and records to verify that the management systems are effective and consistent such as high-risk areas or personnel changes.

17.15.10.7 Operational plans.

17.15.11 Any changes affecting the operation's traceability, chain of custody, or the ability to trace certified products back to the unit of certification.

17.15.12 If the CAB identifies an issue requiring further investigation it shall:

17.15.12.1 Record the existence of the issue and document any evidence found.

17.15.12.2 Raise a non-conformity if one is found.

17.15.13 The CAB may conduct additional surveillance audits of certificate holders for one or more of the following reasons:

17.15.13.1 The number and nature of non-conformities.

17.15.13.2 The number and nature of complaints from the ASC, another CAB, a stakeholder or an interested party.

17.15.13.3 The number and nature of other issues that the CAB determines must be investigated.

17.15.14 The CAB shall specify criteria and conditions for unannounced surveillance audits in their documented procedures.

17.16 Recertification Audits

17.16.1 The CAB shall start the recertification audit before the expiry of the existing certificate.

17.16.2 Exact timing and planning of the audit shall remain the responsibility of the CAB, in consultation with the client.

17.16.3 The CAB, when conducting an audit of a certified operation, shall:

17.16.3.1 Apply all of the steps of the ASC Certification Requirements in force at the time of the audit.

17.16.3.2 Apply interpretations of the relevant standard that are current at the time of the audit.

17.16.3.3 Take into account all surveillance reports, outcomes, progress on non-conformities, and inputs from stakeholders and interested parties.

17.16.3.4 The CAB shall verify that corrective and preventive actions taken allows for the closure of open major non-conformities.

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a) If progress has not been adequate to close the open major non-conformities the CAB shall not re-issue the certificate.

17.16.3.5 Consider the relevance of the original unit of certification and if necessary, shall create modified or a new unit of certification.

17.16.3.6 Maintain records of its consideration of the issues above, as well as any rationale for decisions made relating to these issues.

17.16.3.7 Follow the instructions included in the Social Audit Risk Assessment for re-certification audit (Annex G).

17.17 Extension of Certificate Validity

17.17.1 The CAB may extend the validity of a certificate by up to three (3) months in cases where:

17.17.1.1 The certificate holder has applied to the CAB for recertification and the application has been accepted by the CAB at or before the end of the period of validity of the certificate.

17.17.1.2 There is no product present at the time when the recertification audit is due.

17.17.1.3 The CAB issued the previous certificate.

17.17.1.4 CAB extends the certificate validity in the ASC database before the expiry of the existing certificate.

a) If the ASC database is offline, the CAB shall inform the ASC within ten (10) days of the decision.

17.18 Execution of an audit of social requirements

17.18.1 The CAB's auditors shall follow processes as described in the latest version of ISO 17021-1 related to conducting audits (section 9.4 in ISO 17021-1: 2015).

17.18.2 In addition to 17.18.1, the following shall be implemented by the audit team:

17.18.2.1 Opening meeting:

a) The auditors shall invite senior management of the organisation and key relevant personnel, including workers and/or trade union representatives to attend the opening meeting;
b) Attendance shall be documented for all those present at the opening meeting;
c) The auditors shall state that:
i Worker interviews shall be conducted in a private place, individually and/or in groups.
ii The place shall be determined by the auditor(s) during the course of the audit.

iii Interviewed workers shall not be discriminated against or be put in an unfavourable position for taking part in interviews irrespective of the nature of their job.

iv The auditor may consider additional worker interviews, if necessary, after review of records;

v To provide additional confidence and a method of communication, workers shall be provided with contact information of the CAB and the ASC, and this contact information shall not be taken back from workers by the organisation/UoC after the audit;

vi Management, supervisory and clerical staff may not attend those workers' interviews.

d) The auditors shall inform that audit evidence by way of documents, records, pictures and other multimedia means will be taken during the audit and that these will relate solely to requirements of the applicable standard and other relevant requirements;

e) The auditors shall confirm if there are any changes to information, list of documents submitted by the client for Desk Review and scope of the audit, and reconfirm all documents that will be verified during the audit;

f) The auditors shall determine if there are sub-contractor workers at the site(s) within the scope of the audit or certification, and if so: the number of such workers and the work being performed on the day of the audit.

17.18.2.2 Walkthrough and visit to working areas and facilities within the UoC

a) Auditors shall follow the guidance in the latest version of ISO 19011 regarding visiting the client's location.

b) Auditors shall review travel arrangements and make necessary adjustments to the audit plan on the basis of availability of transport to ensure full audit coverage within the assigned audit time.

c) The visit and walkthrough shall include all work areas irrespective of the presence of workers in the area on the day of the audit, living quarters, on-site hospital/clinic, kitchens, dining areas (if provided), the perimeters of production and processing units, common toilets, common areas like on-site grocery stores, prayer halls and any other areas as appropriate.

d) During the visit and walkthrough, auditors shall:

i. Identify potential workers that they will speak to later;

ii. Identify all hazards and potentially dangerous areas of work;

iii. If possible, collect information (e.g. pictures of notices) to later corroborate information provided prior and/or during the audit;

iv. Distribute the CAB, ASI and ASC contact information to workers that they speak to so that workers may communicate with those organisations at any time.

e) The visit and walkthrough shall be implemented for every on-site audit.

17.18.2.3 Document and records review

a) When drawing samples for records review, the auditor shall consider:

i. Different types of workers (full time, contractual, seasonal, migrants);

ii. Different types of payment methods (hourly rate, piece rate, monthly rate) as appropriate.

b) Auditing of personal records (e.g. time sheet and pay records) shall be based on risk and the sampling plan as outlined in the Social Audit Risk Assessment **Annex G.**

c) For each interviewed worker, his/her personal records and related documents shall be reviewed.

d) Personal information and records shall only be reviewed on-site, unless allowed by legislation of countries of parties involved – the client and the CAB.

e) Other documents as deemed necessary at auditor's discretion.

17.18.2.4 Conducting interviews

a) The CAB shall follow the guidance in the latest version of ISO 19011 as regards to conducting interviews

b) The CAB shall have and implement procedures for deciding how much time to allocate for interviews, depending on types of UoC, issues being audited, types of interview (group/individual) and place(s) where the interviews are to take place.

i. It is a common practice to allocate 15 minutes for individual interviews and 30 minutes for group interviews.

c) Auditors shall interview as a minimum the following functions:

i. Senior management of the UoC

ii. Worker and/or trade union representative(s)

iii. Workers:

A. Number of worker interviews is calculated using the Social Audit Risk Assessment calculator (Annex G)

B. Auditors shall stratify worker interviews based on their tasks and background (gender, type of work – permanent/temporary, type of labour – migrant, and the likes)

C. Number of worker interviews, justification for stratification shall be documented in the audit report.

iv. Other relevant personnel playing a role in implementing ASC social requirements in the standard (e.g. in the area of health & safety human resources, finance, etc.).

d) Auditors shall develop a list of relevant topics for interviewing each function based on results of Desk Review.

e) Auditors shall use professional judgement, common sense knowledge and experience to take the decision, which may be taken on the spot, regarding approach to conducting interviews (individual or group).

f) Auditors shall use appropriate skills to ensure confidentiality while speaking to workers during the visit and walkthrough and at workplaces.

g) The CAB shall maintain records of all interviews during an audit as part of audit evidence.

h) All personal worker interviews shall usually take place on-site; however

i. Off-site interviews shall take place if or when there is a perceived threat or pressure to workers by any party for providing information or there is a lack of a location at the audit site that allows workers to speak confidentially.

i) All worker interviews shall take place in a quiet, private area away from management offices and without the presence of management representatives or those in supervisory roles.

j) Casual interviews shall also take place during the physical tour of the workplace, during meal and rest breaks

k) Interviews may be conducted in the presence of a trade union member, with the permission of the worker, and if the CAB auditor feels worker/s is/are comfortable with this arrangement.

17.18.2.5 Closing meeting

a) A pre-closing meeting with the management may be held for the purpose of:
   i. Discussing audit findings and clarifying any divergent views or opinions;
   ii. Reviewing any information the organisation may provide to demonstrate conformance with the ASC Standard;
   iii. Avoiding differences of opinion that may lead to the organisation contesting audit findings at the closing meeting;
   iv. Saving time at the closing meeting where only key findings, opportunities for improvement, best practices and other matters are discussed.

b) The closing meeting shall be attended by senior management of the UoC and personnel responsible for time and pay records, those responsible for meeting health safety and environment requirements, human resources and administration, those responsible for key functions and workers and/or trade union representatives.
   i. If senior management is not available for the closing meeting this shall be documented in the audit report.
   ii. Attendance shall be recorded for all those present at the closing meeting.

c) The result of the audit shall be communicated in a language understood by those present and, if necessary, translated into a language spoken by workers representatives / trade union members.

d) Depending on the result of the audit and the type of non-conformities raised (if any), auditors shall inform the organisation/UoC of follow up activities as appropriate.

e) Auditors shall remind the organisation/UoC of timelines they need to meet for providing and implementing root cause analysis and corrective actions

f) A copy of non-conformities that were raised shall be provided to the UoC.