



Seafood Program Assurance Manual

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Fair Trade USA



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1. Scope

1.1. This Manual describes requirements for all assurance procedures related to compliance assessment and certification under the Fair Trade USA Seafood Program.



1.2. Organization-wide requirements for standard setting, assurance and certification systems, and impact assessment are described in the Fair Trade USA Quality Manual. The manner in which each Fair Trade USA program meets the requirements for assurance listed in the Quality Manual is described in individual program assurance manuals, such as this one.

2. Normative Documents Under the Seafood Program

2.1. The Fair Trade USA Seafood Program certifies wild-capture seafood products under one standard, the Capture Fisheries Standard (CFS). The CFS sets the requirements for all wild-capture seafood producers, or groups of producers, and is the central wild-capture seafood standard in the Seafood Program, covering wild-capture seafood production systems worldwide. It should also be noted that the Fair Trade USA Seafood Program certifies fish farms under its Aquaculture program (which is covered by the Agriculture Production Standard (APS)).

2.2. The CFS is enabled and operationalized through other related normative documents, primarily policies, procedures, and guidance documents that describe requirements and activities related to compliance with CFS criteria. Where these documents are necessary for effective compliance at the producer or trader level, they are made available on the Fair Trade USA website. Some documents are specific to auditor roles or assurance providers and access is limited to those parties.

3. Eligibility Requirements under the Seafood Program

3.1. Eligibility Criteria for Applicants under the CFS

3.1.1. Fair Trade USA determines the requirements for clients and their products, sites, and activities included under the scope of certificate for all entities to be certified against the CFS.

3.1.2. Eligibility for certification is based upon applicants meeting the requirements as outlined in *Requirements for Certificate Scope Under the CFS*.

3.2. Eligibility Criteria for Conformity Assessment Bodies under the CFS

3.2.1. The following program requirements must be met, in addition to the general eligibility requirements, listed under Section 10.2 of the Fair Trade USA Quality Manual.

3.2.2. Any bodies carrying out assessments against the CFS must have an agreement or contract to use national accreditation bodies which are ISO 17065 accredited for the scope of a relevant standard. Relevant Standards include but are not limited to: national organic Standards, the production Standards of Social Accountability International, Global GAP, the Sustainable Agriculture Network, and UTZ Certified. The Conformity Assessment Body (CAB) may also be directly accredited to ISO 17065 for Fair Trade USA Standards, but this is not required.

3.2.3. The CAB must use the accredited ISO 17065 decision-making process when evaluating performance and making certification decisions regarding Fair Trade USA certificates.

3.3. Assurance Personnel Competency Requirements under the CFS

3.3.1. There are no additional program-specific assurance personnel requirements beyond those listed under Section 10.2.8 of the Fair Trade USA Quality Manual.



4. Assurance Model Under the Seafood Program

4.1. Structure and Decision Making

4.1.1. Under the Seafood Program, Fair Trade USA contracts with 3rd party CABs who review applications, scope audits, conduct audits, write reports, make certification decisions, manage Corrective Action Plans (CAPs), and issue certificates. These activities are conducted on behalf of Fair Trade USA and according to the requirements and process laid out in this Manual.

4.1.2. Fair Trade USA makes decisions in the following instances:

4.1.2.1. When issuing a Temporary Authorization to Trade as outlined in 7.2

4.1.2.2. When suspending or terminating a certificate as outlined in 11.1

4.2. Exceptions

4.2.1. Requests for exceptions to the assurance model, certification system, and standard requirements under the Seafood Program are considered and granted in accordance with the process described in the *Fair Trade USA Policy on Exceptions*.

4.2.2. The Seafood Program will consider exceptions of all types listed in section four (4) of the Exceptions Policy.



5. Compliance Assessment Process

5.1. Certification Process

5.1.1. Fair Trade USA enables certification against the CFS by requiring CABs to follow a standardized assessment process, consisting of:

- a) Submission of an application for certification and recertification (5.3);
- b) Coordination and agreement on service fees and audit scheduling with the audit body (5.3);
- c) An initial onsite evaluation (5.4);
- d) Preparation of an audit report, detailing Non-Compliances (NCs) against the standard requirements (5.5);
- e) Preparation of a CAP to address the NCs identified during the audit (5.6);
- f) Based on the evidence presented, the CAB makes a certification decision (5.7);
- g) If certification is awarded, the CAB will issue a Certificate, documenting compliance against the CFS (7.1);
- h) The Certificate Holder commits to ongoing surveillance audits to ensure continued compliance with subsequent annual Compliance Criteria in the CFS (8.1).

5.1.2. The requirements and details of the steps in the process are described in the relevant numbered sections in this Manual. Together, these steps comprise the initial evaluation of compliance against the CFS, which is described as audit Year 0. The diagram *CFS Compliance Assessment Process* provides a visual sequence of the steps of the Year 0 evaluation.

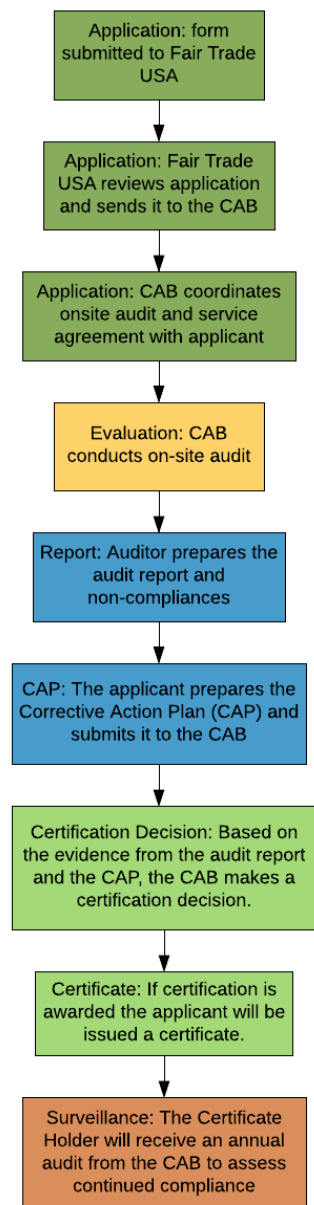


Diagram 1. CFS Compliance Assessment Process



5.2. Certification Cycle

5.2.1. The assessment process (described in 5.1.1. and in Diagram 1) is based on a three-year certification cycle, with the initial certification decision made at audit Year 0 and subsequent certification decisions made in audit Years 3 and 6.

5.2.2. Annual surveillance audits are conducted between evaluation and recertification audits (Years 1, 2, 4 and 5) to assess ongoing compliance with the CFS Compliance Criteria, along with full implementation of CAPs developed as a result of NCs issued during previous audits. For details on surveillance audits, please see Section 8.

Recertification audits are conducted every three years (Years 3 and 6) to assess continuous improvement. Recertification audits follow the same auditing and reporting process as the initial initial audit, including issuance of a new three-year certificate. For details on recertification audits, see Section 9.

5.3. Application for Certification

5.3.1. All parties interested in Fair Trade certification must fully and accurately complete a Fair Trade USA application in order to be considered for certification. All approved CABs direct applicants to Fair Trade USA for this first step towards certification.

5.3.2. Applicants may receive an application form for certification under the CFS from a contact at Fair Trade USA or may download the application form themselves from the Fair Trade USA website.

5.3.3. A complete application is necessary to:

- Confirm correct evaluation scope;
- Confirm sites (defined in 5.4.5.4) to be included in the scope of the evaluation; and,
- Obtain information on certification readiness.

5.3.4. Applications are reviewed by Fair Trade USA to ensure eligibility and that the applicant can potentially comply with the Fair Trade USA standard. If more information is needed, Fair Trade USA works with the applicant to ensure the application includes all the information needed to determine the initial initial audit scope.

5.3.5. Fair Trade USA sends completed applications to the CAB to initiate the assessment process. The CAB uses the application to scope and schedule the initial onsite audit. Applicants are updated during this process and work with the CAB to ensure the audit schedule works for all parties.

5.3.6. Applications for initial certification are reviewed by the CAB to ensure:

- That the CAB has the capability to perform the assessment services with respect to the scope of certification requested, the location of the operation, and any special requirements such as language used by the applicant;
- That the CAB has the capacity and technical expertise to conduct the assessment;
- That the applicant is eligible to receive the services of the CAB;

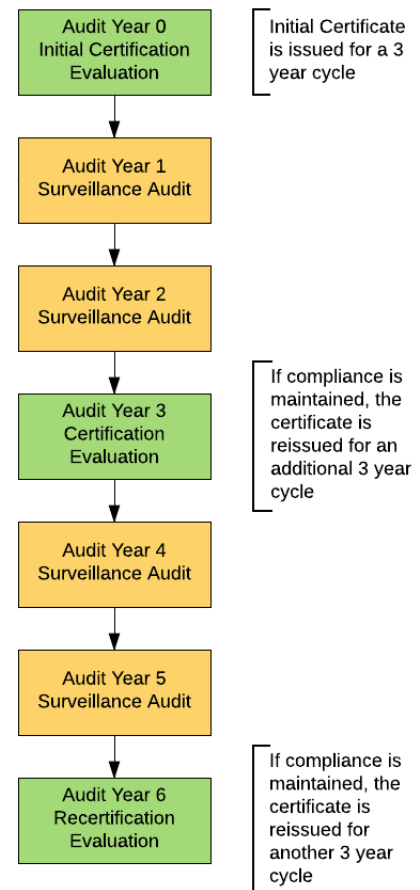


Diagram 2. CFS Certification Cycle



- d) That the requirements for certification have been clearly defined, documented, and understood by the applicant; and,
- e) That any difference(s) in understanding between the CAB and the applicant is resolved prior to the scheduling of the initial evaluation.

5.3.7. The CAB may request additional necessary information from the applicant in order to clarify the evaluation scope or logistics for the evaluation.

5.3.8. The CAB then provides the applicant with:

- a) A current, detailed description of the evaluation and assessment process;
- b) Documents containing the requirements for certification, i.e. the applicable Fair Trade USA standard and Compliance Criteria;
- c) Any relevant policies, procedures, guidance documents, and forms; and,
- d) A quote for evaluation services based on the application information.

5.3.9. The applicant must review and approve the audit quote and agreed upon schedule for the assessment process to move forward.

5.3.10. The CAB shall explain to applicants that the payment of service fees does not guarantee that the certificate will be issued. Each CAB has the right to determine its own detailed fee structure, audit timelines, and payment schedule, which it may explain to its prospective clients when providing an audit quote. The fee structure should be adequate to support accurate and truthful assessments commensurate with the scale, size and complexity of the fishery or chain of custody and should be non-discriminatory and consider the special circumstances and requirements of developing countries and countries in transition.

5.3.11. Upon the applicant's approval of the quoted service fees and schedule and the CAB's receipt of any necessary signed documents and payments the CAB initiates the audit planning process and sends the applicant an audit plan, which details the scope of the evaluation, contact information for the auditor/audit team assigned to complete the work, the daily agenda for the audit, and any documentation that should be sent in advance of or prepared by the time of the audit. The applicant should confirm agreement with the audit plan in writing.

5.3.12. The CAB identifies an appropriate auditor or audit team with the necessary competencies, geographical location, and language to conduct the evaluation according to the scope of the evaluation and confirms there is no potential conflict of interest.

5.3.13. Audit teams are comprised of at least one Lead Auditor. It is common practice for CABs to deploy a single Lead Auditor to conduct audits against the CFS, particularly if there are no circumstances or a specific need identified that would require a larger team.

5.3.14. In instances where there is no auditor with fluency in the language of the applicant or Certificate Holder, the services of a translator will be used. Ideally, the translator will have a relevant technical background. The translator shall be independent from the audited partner where possible to avoid any conflict of interest.

5.4. Evaluation

5.4.1. Applicable Compliance Criteria

5.4.1.1. The CFS contains six Sections covering the following topics: Structural Requirements, Empowerment & Community Development, Fundamental Human Rights, Wages, Working



Conditions & Access to Services, Resource Management, and Traceability and Transparency.

- 5.4.1.2. Each section is divided into sub-sections, which are composed of objectives. Each objective has one or more associated requirements specified in the Compliance Criteria.
- 5.4.1.3. Compliance Criteria define the requirements that must be met for certification, meaning they are binding. Many Compliance Criteria are accompanied with an explanation in the Intent and Clarification column to help the reader better understand the criteria. Information in the Intent and Clarification column is divided into clarifications, which are binding, and guidance, which is best practice, or optional. The guidance also includes examples and suggestions for how to achieve compliance with the requirements.
- 5.4.1.4. The six Sections of the CFS, their respective sub-sections, and associated Compliance Criteria make up the minimum set of issues that need to be checked in a full-scope audit. Initial, annual surveillance, and recertification audits are always full scope. Follow-up audits (8.2) may be full scope or partial scope as per the need identified by the CAB. Fair Trade USA may also provide input to the CAB regarding the scope for follow-up audits.
- 5.4.1.5. The CAB is provided with a standardized audit template that includes the full set of criteria that need to be checked during an audit. In the case of a follow-up audit, the scope may be limited to certain issues that are identified by the CAB with input from Fair Trade USA, based on the needs identified.
- 5.4.1.6. The Fair Trade USA CFS takes a continuous improvement approach for development. Entry criteria, or Year 0 requirements, are assessed during the initial certification audit and represent minimum requirements regarding social empowerment, economic development, and environmental responsibility. These criteria must be met prior to initial certification.
- 5.4.1.7. Progress criteria are fulfilled after the first, third, or sixth year of audits as detailed in the *Year* column. By Year 6, all criteria must be met. Progress criteria represent continuous development towards increased social empowerment and economic development as well as improved practices in environmental stewardship.
- 5.4.1.8. Some Compliance Criteria have a qualifying statement at the beginning of the sub-sections that clarifies the scope and timing of applicability. For example, some of the Year 0 requirements cannot be fully implemented until the time of the first sale of Fair Trade Certified products or the first Premium expenditure. In these cases, the requirements must be met as soon as they become applicable, which may be some time between the Year 0 and the Year 1 audits.
- 5.4.1.9. Some Compliance Criteria also apply based on different aspects of the fishery, which include, for example, vessel length, days at sea, distance from shore and where there are a “significant number of workers” (more than five permanent employees). In other instances, Compliance Criteria will only apply to certain types of workers. For instance, some Compliance Criteria covering occupational health and safety and resource management will only apply to Registered Fishermen. In other examples they will relate more to Premium Participants, workers, and crew members. Some Compliance Criteria may cover all types of workers. For a full definition of Premium Participants, Registered Fishermen, and crew members and workers refer to page 9 of the Capture Fisheries Standard.
- 5.4.1.10. At the time of the Year 0 audit, the auditor will determine whether the fishery will be prepared to meet these requirements when they become applicable. The auditor may ask for preliminary evidence to support that determination. Conformity Assessment Bodies may



conduct follow-up audits or request supporting documentation before the next full audit to ensure the Compliance Criteria have been met.

5.4.2. Assessment Methods

- 5.4.2.1. CABs must conduct audits based upon ISO 19011 auditing methodologies.
- 5.4.2.2. The CAB's auditor or audit team conducts the assessment of the partner's operations to assess compliance with the applicable Fair Trade USA standard Compliance Criteria.
- 5.4.2.3. The audit will begin with an opening meeting to address the audit scope, audit methodology, and any questions.
- 5.4.2.4. The auditor will then inspect the site(s) to collect and verify information by observing the operation(s), interviewing workers, management, and producers, and reviewing applicable documents.
- 5.4.2.5. After compiling the information and initial findings, the auditor will convene a closing meeting to provide a general explanation of the initial audit findings and address any questions. The applicant or Certificate Holder must have provided sufficient information during the entire audit and closing meeting in order to gain a clear understanding of the findings and receive a preliminary report of the audit findings. It is best practice to meet with the applicant or Certificate Holder throughout the course of conducting the audit during or at the end of each day to inform them about potential non-compliances, in order to avoid surprises during the closing meeting.

5.4.3. Provision of Information to the Applicant During the Audit

- 5.4.3.1. During the course of the audit, the auditor may provide information to the applicant about Fair Trade Standards and the Fair Trade assurance program. This may include information about interpretation of Standards, approved guidance issued by Fair Trade USA, and any publicly available policies and procedures of Fair Trade USA. The auditor must ensure that all information provided to the client is consistent with the most current and up to date information about the Fair Trade USA program.
- 5.4.3.2. Auditors may not provide information to applicants that is of a confidential nature (e.g. complaints and allegations) or that poses a real, perceived, or potential conflict of interest. This includes any consulting or advice on how to achieve the standard beyond what is provided by Fair Trade USA in approved guidance documents, which are available to all producers, as well as strategies to circumvent or undermine the intent of the standard.

5.4.4. Information Collection Methods

- 5.4.4.1. Evidence is collected during an audit using three primary methods: document review, interviews, and field observation.
- 5.4.4.2. Document review begins before the onsite audit with the partner application, and the previous Corrective Action Plan form, when applicable (see also 5.6). The auditor must review both documents (e.g. policies, objectives, plans, procedures, work instructions, licenses/permits) and records (e.g. pay slips, timecards, field logs, employee contracts, training records, purchasing records, employee complaints). It is important to note that where



the CFS Compliance Criteria specifically require documentation, the partner must provide sufficient and relevant documentation to be compliant.

- 5.4.4.3. Interviews should be conducted with a variety of employees and relevant individuals. This should include at minimum interviews with a sample of Fair Trade Committee members and management, workers' association representatives (when applicable), members of permanent, temporary, and migrant worker groups, and representatives from different types of job categories. Sampling requirements are described further under Section 6.2.
- 5.4.4.4. Auditors should ensure they can directly observe a sufficient variety of producers and workers in their daily activities.

5.4.5. Determining Non-Compliance

- 5.4.5.1. Auditors evaluate applicants and Certificate Holders against the applicable Compliance Criteria for the scope of operations, and the audit year. Operations of all sizes are audited against the same criteria; however, the size may determine eligibility of an operation. The evidence collected using the aforementioned assessment and information collections methods enable the auditor to determine compliance.
- 5.4.5.2. Eligibility for certification is based on the size of an operation, which are defined in the CFS as small and mid-scale fisheries. Eligibility for certification is contingent on vessel size, time at sea, crew size, and other factors.
- 5.4.5.3. The vessels used to catch and transport Fair Trade Certified wild-capture seafood and sites where Fair Trade Certified seafood is landed are always included in the scope of the CFS Certificate. This includes the fishing vessels, transfer vessels, tender vessels, and fishing grounds (habitat and associated species) where Registered Fishermen fish.
- 5.4.5.4. A site is a natural grouping of one or more landing areas, or processing facility buildings with a common workforce which might work at different places on different tasks, or where fishermen and workers might cross paths during the day even if they do not work together. For example, this would include a complex of buildings with a common entrance. Any worker housing provided by the Certificate Holder, Fishing Association, or Registered Fishermen is considered part of a site, even if it is located elsewhere, and is included in the scope of the Certificate and CFS audit.
- 5.4.5.5. A non-compliance(NC) is identified where audit findings indicate that an applicant or Certificate Holder does not meet a requirement related to the applicable Compliance Criteria. NCs may be recorded as either Major or Minor with both categories being subjected to the Corrective Action Plan process by the CAB.



5.5. Audit Report

5.5.1. Report Requirements

- 5.5.1.1. Following the audit, the lead auditor is responsible for preparing a timely, complete, and accurate audit report detailing the findings and any non-compliances identified. All information provided in the audit report is based on evidence collected through the audit.
- 5.5.1.2. Audit findings are recorded in the current version of the audit report template provided by Fair Trade USA for all applicable Compliance Criteria and performance indicators.
- 5.5.1.3. Confidential audit notes, a component of the audit report template, are shared between the auditor, CAB, and Fair Trade USA; not with the applicant or Certificate Holder. These notes may include, but are not limited to, general observations, systemic issues, high risk areas, and rationale for sample selections.
- 5.5.1.4. Evidence for both compliant and non-compliant results are documented for all applicable Compliance Criteria evaluated.
- 5.5.1.5. Auditors submit complete audit reports to the CAB for technical review prior to reports going to the applicant or Certificate Holder.

5.5.2. Technical Report Review

- 5.5.2.1. Only qualified personnel are authorized to conduct reviews of audit reports and assess the efficacy of any corrective actions taken to address Non-Conformities (NCs). Qualification must include training in program specific technical requirements, the relevant standard Compliance Criteria, and review of program specific reporting and documentation requirements.
- 5.5.2.2. During the technical review the CAB may contact Fair Trade USA for guidance or input if needed on any issues such as Standards interpretation.
- 5.5.2.3. After technical review the audit report is forwarded to the applicant or Certificate Holder with a Corrective Action Plan (CAP) form if any NCs were identified, within 28 calendar days from the date of the closing meeting. The Non-Conformity Report and CAP are templates created by Fair Trade USA and used by the CAB.
- 5.5.2.4. If due to unforeseen circumstances or factors outside the control of the CAB the report cannot be provided to the applicant or Certificate Holder within 28 calendar days, the client is informed of a revised timeline along with an explanation of the reasons.
- 5.5.2.5. At this time the CAB also provides the partner with the opportunity to comment on the audit process and the auditor's performance.
- 5.5.2.6. The CAB transfers all applicable documents relating to the audit to Fair Trade USA in accordance with the timelines specified in the *Guidance on Conformity Assessment Bodies Sharing Audit Documentation*.



5.6. Corrective Action Plan

5.6.1. Preparing the CAP

- 5.6.1.1. The Corrective Action Plan (CAP) form provides a template that the applicant or Certificate Holder uses to describe the preventive and corrective actions to be taken within an expected timeline to address the NCs identified during the audit.
- 5.6.1.2. The applicant or Certificate Holder must complete the CAP form and provide supporting objective evidence that sufficiently addresses the NCs identified in the audit report. They then must submit this to the CAB within 30 calendar days of receiving the audit report. Depending on the nature of NCs, the CAB may request the CAP be submitted within a shorter timeframe.
- 5.6.1.3. The completed CAP form must at minimum address all identified non compliances in the applicable certification year for each section.

5.6.2. Corrective Action Plan Review

- 5.6.2.1. When the completed CAP form is received by the CAB, it is reviewed by a CAB staff member qualified for Technical Report Review. As standard practice, this review should be completed within 15 calendar days of receiving the CAP form. However, if there is a specific reason requiring additional time to complete the review (e.g. complex or large number of NCs), then the CAB must inform the applicant or Certificate Holder of the date by which the review will be completed.
- 5.6.2.2. If a CAP is sufficient to bring the applicant or Certificate Holder into compliance with the specific requirement that triggered the NC, and sufficient evidence is submitted to verify implementation of the CAP, then the NC will be closed.
- 5.6.2.3. If a CAP is sufficient to bring the applicant or Certificate Holder into compliance with the specific requirement that triggered the NC, but an onsite assessment is needed to verify implementation of the CAP, then the NC will be closed with contingencies.
- 5.6.2.4. If the CAP is not sufficient, the CAB will send the applicant or Certificate Holder a new CAP form with indication of new information requested.
- 5.6.2.5. Responses to the revised CAP form (5.6.2.4) must be received within 15 calendar days or within the timeframe specified by the CAB. If the deadline to submit a response passes without the applicant or Certificate Holder notifying or receiving an extension from the CAB, then the CAB has the right to start a new round of CAP review.
- 5.6.2.6. The process described above may be repeated for up to five rounds of CAPs. If the response provided by the applicant or Certificate Holder is still not sufficient to close the NCs after five rounds, then in the case of an applicant the certification is denied (see 5.8.2) and in the case of an existing Certificate Holder the certification is suspended (see 11.1.2).
- 5.6.2.7. Once all NCs have been closed, the technical reviewer records the CAP review and NC closure.



5.7. Certification Decision

5.7.1. Issuing Certification

- 5.7.1.1. When any and all NCs have been closed, the completed CAP will be presented to a qualified technical staff member of the CAB who is responsible for final review and issuance of a certification decision.
- 5.7.1.2. All audit reports are reviewed to confirm the adequate collection of compliance evidence to make a certification decision.
- 5.7.1.3. Certification decisions include the decision to grant, renew, expand the scope of, reduce the scope of, suspend, reinstate, or withdraw certification.
- 5.7.1.4. Certification decisions (initial certification and renewal of certification) are made by qualified CAB personnel who did not participate in the audit process or, where possible, in the review of CAPs. This separation of responsibilities ensures impartiality and objectivity in the certification decision process.
- 5.7.1.5. In certain instances, depending on the nature of the NCs and the proposed CAPs, the CAB may need to conduct a follow-up audit to confirm implementation and efficacy of the CAPs prior to making a certification decision. The auditor reserves the right to expand the scope of the follow-up audit to include additional Compliance Criteria as deemed necessary based upon previous audit findings.
- 5.7.1.6. If the audit report review confirms that all certification requirements have been met, the certification decision is recorded, and a certificate may be issued by the CAB.

5.7.2. Certification Denial

- 5.7.2.1. The CAB may deny certification if any NCs identified during the audit have not been adequately addressed. The following circumstances may lead to a denial of certification:
 - a) Failure to present CAPs and sufficient supporting evidence to close the NC(s) within the time frame specified in the NCR or within five rounds of CAPs.
 - b) Identification of NCs against one or more Major criteria, depending on the nature of the NC(s) and the CAP(s) submitted. Examples include, but are not limited to, requirements related to the Core Conventions of the International Labour Organization (ILO), corruption, or fraud.
- 5.7.2.2. If certification is denied, the CAB will send a formal notification letter to the applicant explaining the reasons for the decision to deny certification.
- 5.7.2.3. An applicant or Certificate Holder may voluntarily elect to reapply to the program and begin the assessment process anew. In such cases the CAB may require that the client submit a new application for certification, along with evidence of CAP implementation to address the relevant NC(s). Accordingly, a new initial audit would then be conducted to confirm effectiveness of corrective actions.

5.7.3. Certification Decision on Complaints and Appeals

- 5.7.3.1. Applicants or Certificate Holders that are not satisfied with the performance of their CAB shall issue a complaint directly to the CAB, which must have procedures to deal with complaints.
- 5.7.3.2. Applicants or Certificate Holders that disagree with a certification decision may appeal that decision to the CAB, which shall have an appeal procedure. Appeals may only be made on



the grounds of either the CAB not following the process established by the Fair Trade USA assurance program and/or the CAB making an error in fact.

5.8. Audit Cadence

5.8.1. Audit Duration

5.8.1.1. Onsite audit duration and sampling requirements are determined by the CAB based upon the size and scope of operations, following the Requirements for Calculating Sample Size and Audit Duration. The audit duration is calculated to account for sufficient time for meetings, document review, field observations, interviews, and preparation of findings. The exact amount of time required for interviews and site visits may be adjusted according to factors such as the distance between sites, reviewing sites with worker housing, or the context of the audit (e.g. high-risk situations).

5.8.2. Audit Frequency and Intensity

5.8.2.1. Certificate Holders under the CFS receive an onsite audit every year as part of regular compliance surveillance. For details on the surveillance schedule, see Section 8 of this Manual.

5.8.2.2. Audit intensity (the range of Compliance Criteria assessed, and the number of sites visited) is dictated by the year in the six-year audit cycle and the sampling method used if auditing a group or Certificate Holder with multiple sites. The Compliance Criteria associated with each audit year in the cycle is described under Section 5.5.1 of this Manual.

6. Assessment of Groups

6.1. Defining Groups Under the CFS

6.1.1. The CFS covers diverse groups of facilities and labor arrangements. The scope of a Certificate can thus cover a single entity, or a group of entities, which could be of different sizes and/or owned and controlled by multiple parties, such as a cooperative collectively owned by multiple small producers, or an exporter buying from independent facilities.

6.1.2. Groups encompass all harvesting activities and any sites managed by the Certificate Holder, or intermediate buying and selling operations between the fishermen(s) and the Certificate Holder, where Fair Trade Certified product is being processed, packed, sorted for quality, or transformed.

6.1.3. There may be instances when there are different groups of facilities (i.e. multiple processors) and there can also be different groups of fishermen (where the different groups supply to the same processor but are in different certification years).

6.1.4. Sites under the scope of the Certificate are categorized as small and mid-scale fisheries.

6.1.5. The compliance assessment process, as described in Section 5, applies to both single entities and groups of entities.

6.2. Sampling Requirements for Groups

6.2.1. Fair Trade USA defines the sampling procedure by which the auditor can determine the total number of sites to visit and interviews of registered producers or workers to conduct during the course of the audit in the *Requirements for Calculating Sample Size and Audit Duration*.



7. Fair Trade USA Certificates

7.1. Issuance of Certificates

7.1.1. CABs take sole responsibility for their decisions related to the granting, maintaining, extending, limiting, suspending, and withdrawing of certification status under their assessment programs.

7.1.2. Fair Trade USA will create a unique Fair Trade USA identification number and provide this to the CAB. The CAB will then issue the applicant a certificate with that identification number as well as the applicable certification seal (generally an artwork file).

7.1.3. The Fair Trade USA certificate identifies the name and address of the entity whose processes are the subject of certification and the scope of certification granted, including, as appropriate:

- a) The product(s) and fishing gear covered under the scope;
- b) The Standards to which the Certificate Holder's operation is certified;
- c) The effective date of certification and the term of the certification; and
- d) The names of the sites under the scope.

7.1.4. Certificates are valid for a period of three years from the date of the certification decision.

7.1.5. Audits conducted, and certifications granted, to any Fair Trade USA standard during a pilot-testing phase will be considered valid for the duration of the three-year certificate even if the standard and Compliance Criteria therein are modified based on stakeholder review, unless otherwise specified by Fair Trade USA.

7.1.6. Only licensed partners of Fair Trade USA may use the Fair Trade Certified™ seal on approved finished products and must follow the *Fair Trade USA Seal and Language Use Guide*.

7.1.7. Certificate Holders may share or display their certificate as evidence of certification.

7.1.8. Certificate Holders are publicly listed on the website of the CAB.

7.1.9. Should the CAB withdraw certification status, as described under Section 11.2, the Fair Trade USA certificate is rendered null and void.

7.2. Temporary Authorization to Trade

7.2.1. Upon completion of an initial audit, an applicant may request Temporary Authorization to Trade (TAT) from Fair Trade USA. The applicant must submit a request following the *TAT Policy* (found on the FTUSA website) and if eligible and approved, Fair Trade USA will issue a TAT Certificate to the applicant.

8. Ongoing Surveillance

8.1. Annual Audits

8.1.1. Annual surveillance audits are conducted in the years between evaluation and recertification audits (Years 1, 2, 4, and 5) to assess ongoing compliance with the applicable Compliance Criteria, along with full implementation of CAPs developed as a result of NCs issued from previous audits.

8.1.2. The target timeframe for scheduling surveillance audits is generally between the date of the initial audit and the certification anniversary date and when at least 50% of the workforce is available. In some cases, depending on the timing of and nature of activities at the certified site(s) (i.e. harvest, presence of workforce), the target timeframe for a surveillance audit may fall outside of this window (earlier or later). In all cases, there will be a final date identified (no longer than three months after the annual audit) by which the surveillance audit should occur.

8.1.3. Surveillance audits follow the auditing, reporting and review process described in Section 5.



8.1.4. Surveillance audits are generally conducted as announced audits. However, in accordance with the Fair Trade USA Policy for Unannounced Audits, if the CAB, in consultation with Fair Trade USA, determines there is a need to conduct an unannounced audit which would take place within a similar time frame as the annual surveillance audit, then the CAB may conduct the surveillance audit as an unannounced audit.

8.1.5. All NCs identified during surveillance audits must be closed according to timelines specified by the CAB during the CAP process in order to maintain their certificate.

8.2. Follow-up Audits

8.2.1. In certain instances, the CAB may conduct follow-up audits outside of the regular certification cycle of evaluation, surveillance, and recertification audits.

8.2.2. Follow-up audits may occur for reasons that include, but are not limited to:

- a) Confirmation of the implementation and efficacy of CAPs prior to making a certification decision or prior to closing NCs following a surveillance audit;
- b) Changes to operations that impact the certification scope;
- c) Response to allegations of non-compliance; and
- d) Ongoing risk management.

8.2.3. The auditor may expand the scope of the audit to include additional Compliance Criteria as deemed necessary based on findings onsite.

8.2.4. Additional guidance for auditors and CABs on requirements for conducting and sampling within follow-up audits is found in the *Follow-up Audit Guidance* document.

8.2.5. These audits may be announced or unannounced. Facilitation of audits in any instance is a requirement under the CFS.

8.2.6. The *Fair Trade USA Policy for Unannounced Audits* outlines selection criteria, scope, and audit process.

9. Recertification

9.1. Application for Recertification

9.1.1. The CFS is based upon a certification cycle that requires an evaluation for recertification every three years.

9.1.2. New applications for recertification are reviewed by the CAB as described in Section 5.3.

9.1.3. The application may also reflect changes to the existing certificate scope or geographical area, if relevant, as described in Section 10.3.

9.1.4. An auditor or audit team is assigned as in Section 5.4.

9.2. Recertification Audit

9.2.1. Recertification audits are conducted every three years (Years 3 and 6) to assess continuous improvement against the applicable Fair Trade USA requirements.

9.2.2. Additional Compliance Criteria apply in recertification years as described in Section 5.5.1.

9.2.3. Recertification audits are scheduled to allow enough time to complete the audit process (i.e. any NCs must be closed) prior to the certificate expiration.

9.2.4. Recertification audits follow the auditing, reporting, and review process described in Section 5.



9.2.5. The decision-making process for certification is repeated (Section 5.8), culminating in the issuance of a new three-year certificate, provided that all NCs have been satisfactorily addressed.

10. Changes Affecting Certification

10.1. Changes to Normative Documents

10.1.1. CABs must make relevant resources available to Certificate Holders, in accordance with Fair Trade USA procedures, including:

- a) Fair Trade USA normative documents: Standards, Compliance Criteria, policies, procedures, etc.
- b) Publications, forms, templates, and guidance documents.
- c) Official communications and Certificate Holder notifications.

10.1.2. In the event of changes to any normative documents, guidance documents, or Certificate Holder-facing forms or templates, the CAB ensures that partners and individuals involved in or affected by the assurance system are promptly notified of the changes and provided with the new or updated materials.

10.2. Changes in Certification Requirements

10.2.1. Fair Trade USA maintains defined protocols for implementation of changes in certification requirements, including timelines by which changes come into effect.

10.2.2. Fair Trade USA ensures that partners and individuals involved in or affected by the assurance system are promptly notified of changes in requirements.

10.2.3. Fair Trade USA ensures that CABs have all the necessary, up-to-date documents to ensure professional auditing and certification procedures.

10.2.4. In the event of new or revised Fair Trade USA certification requirements, CABs are responsible for conducting certification work according to any transition policies applicable during the transition period as defined by Fair Trade USA.

10.2.5. In the event of new or revised Fair Trade USA certification requirements, the CAB communicates these changes to all affected Certificate Holders.

10.2.6. The CAB verifies the implementation of the changes through the normal audit process, or otherwise if necessary.

10.3. Changes Affecting Scope

10.3.1. CABs require that Certificate Holders report to them any changes in operations that impact the certification scope.

10.3.2. In the case that such a change in operations is reported to the CAB, or in response to an application for amendment to the scope of a certificate already granted, the CAB reviews the reported change or request for amendment to determine whether an additional onsite surveillance audit is required.

10.3.3. The expansion or reduction of an CFS certificate, which may include adding or removing sites, members or products covered under a certificate follows the *Changes to Certificate Scope Procedure*.

10.3.4. The Certificate Holder must report any changes in ownership or management of a Certificate Holder to the CAB, who will then determine if the consequences of the change require an audit outside of the typical audit cycle.

10.4. Change of CAB

10.4.1. In the event that a Certificate Holder chooses to transfer a current certificate to another Fair Trade USA approved CAB, the Certificate Holder must follow the *Change of Conformity Assessment Body Policy*.



The policy includes the conditions, steps to request a change of CAB, and terms that must be met by the Certificate Holder.

10.4.2. The audit and certification cycle will be based on the Certificate Holder's standing within the Fair Trade USA system, e.g. if the Certificate Holder is at Year 2 with the current CAB, they are expected to have an audit against Year 3 criteria.

11. Certification Suspension and Decertification

11.1. Suspension

11.1.1. Fair Trade USA retains the right to suspend or terminate a certificate, and to update the terms of trade during suspension and/or the conditions of reinstatement, upon finding grievous non-compliances with the Fair Trade USA assurance program and/or any of their standard requirements that represent a serious risk to producers, workers, traders, consumers, and/or the goodwill of Fair Trade USA or the CAB as determined by those parties.

11.1.2. Fair Trade USA immediately informs the CAB and the Certificate Holder of the certification decision and the nonconforming product in the market and steps taken to reduce, eliminate, or recall nonconforming product bearing the Fair Trade Certified seal.

11.1.3. A CAB has the right to suspend or withdraw certificates.

11.1.4. A certificate may be suspended at any time, generally for a maximum period of 6 months, due to circumstances including the following:

- a) A substantiated lapse in compliance with one or more Compliance Criteria during the interim period between annual audits, which is not closed (with or without contingencies) through the regular CAP process.
- b) Failure to fully address NCs through CAPs within the timeframe specified by the CAB during the surveillance audit cycle.
- c) Identification of NCs during a surveillance or follow-up audit, depending on the nature of the NC(s) and/or the Certificate Holder's response to the NC(s) through the CAP process. Examples include, but are not limited to, requirements related to the Core Conventions of the International Labor Organization (ILO), corruption or fraud.
- d) Failure to implement CAPs from a previous audit effectively.
- e) Allegation by a third party (e.g., a worker, worker organization, producer organization, or union) of non-compliance with one or more Compliance Criteria (including NC(s) which were not identified during an audit), which is substantiated through an investigation process.
- f) NCs identified during an unannounced audit against Compliance Criteria to which the Certificate Holder had previously been found in compliance.
- g) Failure on the part of the Certificate Holder to facilitate an unannounced or announced audit, or obstruction of the audit process by the Certificate Holder or the Certificate Holder's representatives.
- h) Failure to schedule a required surveillance, follow-up, or recertification audit within the timeframe specified by the CAB.
- i) Failure to meet contractual obligations (e.g. non-payment of fees).

11.1.5. If a suspension is issued within a timeframe when a certificate is due to expire, the certificate will be extended in line with the duration of the suspension period.

11.1.6. Suspension notifications including conditions of suspension are sent to the Certificate Holder, and copied to Fair Trade USA, by CAB staff who are trained in handling suspended certifications. The notification is sent by email with an attached letter and may or may not include conditions for certification reinstatement.



11.1.7. Conditions for reinstatement will typically be provided to allow the Certificate Holder recourse and an opportunity to respond with CAPs to the NCs identified.

11.1.8. The CAB may require a follow-up audit to confirm the implementation and effectiveness of CAPs, after which certification may be reinstated if all NCs are closed.

11.1.9. The follow-up audit should take place during the peak production period, where timing permits, and ideally within two months of the date of the suspension notice and no more than four months after the date of the suspension notice. Time periods of suspension may be extended, in rare instances, if necessary, to accommodate the audit process.

11.1.10. Conditions for reinstatement will generally not be provided in the following situations:

- a) An intentional lapse in compliance with the Compliance Criteria is observed;
- b) Falsified or misleading information is presented to auditors or to other compliance assessment personnel; and/or
- c) An auditor is treated in a hostile manner.

11.1.11. Both the CAB and Fair Trade USA update their records and publicly-available lists of Certificate Holders to ensure they reflect current certification status.

11.1.12. If a decision to reduce the scope of certification is made as a condition of reinstatement, the reduced scope of certification is clearly communicated to Fair Trade USA and the Certificate Holder and specified in certification documentation and public information.

11.1.13. Suspended parties are permitted to produce and trade Fair Trade Certified products under the following conditions:

- a) All existing Fair Trade USA contracts, created prior to the suspension date, should be fulfilled as stipulated in the contract.
- b) Any new Fair Trade USA contracts, created during the suspension period, are only permitted with other Fair Trade USA operators with whom the suspended parties have an 'existing relationship'. An 'existing relationship' is defined as any Fair Trade USA operator with whom the suspended parties did Fair Trade USA business in the twelve months prior to the suspension date.

11.1.14. Certificate Holders shall not enter in new trading relationships for Fair Trade Certified products while suspended.

11.2. Decertification

11.2.1. Fair Trade USA has the right to withdraw certificates, and in so doing decertify the Certificate Holder, at any time, regardless of audit timelines.

11.2.2. Certificate Holders may opt to voluntarily withdraw from certification at any time in the certification cycle.

11.2.3. A Certificate Holder's certification may be rescinded in situations where the outstanding issues leading to a suspension have not been addressed satisfactorily within the specified time period.

11.2.4. When a suspension process has not resulted in the reinstatement of the certification, decertification is the final step to render the Fair Trade USA certificate null and void.

11.2.5. A lack of responsiveness by the partner to repeat communications related to scheduling audits or closing NCs will also be considered a voluntary withdrawal from the program.

11.2.6. Decertification notifications, including conditions of decertification, are sent to the Certificate Holder by the CAB, in the form of an email with an attached letter, copying Fair Trade USA.

11.2.7. The CAB and Fair Trade USA update all records and public lists of Certificate Holders to reflect the decertified status.



11.2.8. A decertified Certificate Holder may voluntarily elect to reapply to a CAB and begin the certification process anew.

11.2.9. Certificate Holders that disagree with a certification decision may appeal that decision to the CAB as established in Section 5.7.3 of this document.

12. Record Keeping

12.1. CABs must retain records to demonstrate that all certification process requirements have been effectively fulfilled.

12.2. Records are kept confidential.

12.3. The following electronic records are kept for at least seven years by the CAB and are readily available for evaluation by Fair Trade USA:

- a) Compliance assessment personnel (staff and auditors) records including contracts, CVs, qualifications, confidentiality agreements, training records, declarations of potential conflicts of interest, and performance reviews;
- b) Certification applications;
- c) Assessment services agreements;
- d) Audit reports and associated records;
- e) Records of certification decisions and notification of such decisions;
- f) Certification complaints, appeals or disputes, including records of review and follow-up on such complaints, appeals or disputes.

13. Oversight of Conformity Assessment Bodies under the Seafood Program

13.1. Oversight Program Structure

13.1.1. Oversight in the Seafood Program includes regular assessments of all components described in the *Conformity Assessment Body Oversight Program*.

13.1.2. Oversight activities are carried out by Fair Trade USA Certification Team staff. The annual oversight schedule is determined by the team and implemented according to the cycle described in the *Conformity Assessment Body Oversight Program*.

13.1.3. As part of the Oversight Program planning process, the following criteria are identified:

- a) Annual review period to account for the audit season;
- b) Timelines for submission of inputs for the oversight program, the activities and outputs; and
- c) Identification of the specific steps in the audit process that will be included in the assessment and the sampling methods.

13.2. Oversight of CAB Audit Processes

13.2.1. The Seafood Program assesses CAB compliance with the audit process as described in section 7.1 of the *Conformity Assessment Body Oversight Program*. The audit process requirements for which compliance is assessed are described in this Manual and its related policies, procedures, and guidance materials, and summarized in the following table.



Audit Process	Normative Reference
Application for Certification and Audit Planning	Seafood Program Assurance Manual Section 5.3
Evaluation	Seafood Program Assurance Manual Section 5.4
Sampling	Requirements for Calculating Sample Size and Audit Duration
Audit Report	Seafood Program Assurance Manual Section 5.5
Corrective Action Plan	Seafood Program Assurance Manual Section 5.6
Reporting	Guidance on Conformity Assessment Bodies Sharing Audit Documentation
Certification Decision	Seafood Program Assurance Manual Section 5.7
Audit Cadence	Seafood Program Assurance Manual Section 5.8
Issuance of Certificate	Seafood Program Assurance Manual Section 7.1
Changes Affecting Scope	Changes to Certificate Scope Procedure
Change of CAB	Change of Conformity Assessment Body Policy
Certificate Suspension and Decertification	Seafood Program Assurance Manual Section 11
Record Keeping	Seafood Program Assurance Manual Section 12

13.2.2. For each CAB, fifteen percent (15%) of the audits conducted since the last review period are sampled for process compliance. This sample includes any audits for which a witness audit was conducted.

13.2.3. The sample is stratified by operation size, and includes all audits conducted of operations with complex business structures, with the remainder of the sample divided between audits of mixed size and large operations, and medium and small operations.

13.3. Sanctions for CABs

13.3.1. While suspended, CABs are not permitted to take on new work, but may continue to service existing clients. New work is defined for the Seafood Program as any new applicants that have not yet signed a service agreement, and any upcoming audits that have not yet been scheduled. Audits that have already been scheduled (including initial, surveillance, recertification, follow-up and announced / unannounced audits) by the CAB with the client are not considered new business and may proceed as planned. Issuance of audit reports, CAP processes, and certificates are considered part of existing business that the CAB is responsible to continue through to completion.



ABOUT FAIR TRADE USA

Fair Trade USA is a nonprofit organization that promotes sustainable livelihoods for farmers and workers, protects fragile ecosystems, and builds strong, transparent supply chains through independent, third-party certification. Its trusted Fair Trade Certified™ seal signifies that rigorous Standards have been met in the production, trade and promotion of Fair Trade products from around the world. Recognized as a leading social venture by the Clinton Global Initiative, the Skoll Foundation and Ashoka, Fair Trade USA also provides critical capacity-building programs at origin and educates consumers about the power of their purchase. Visit www.FairTradeCertified.org for more information.

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