



Best Aquaculture Practices Farm and Hatchery Group Program Policy and Control Document

Issue 1.0
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Section A – Introductions and Definitions

1.0 Definitions

Group - A collection of facilities organized for the sake of a collective certification process, that have implemented a shared Quality Management System (QMS), and which share a common sponsor (or common owner/legal entity), who appoints a Facility Group Manager (FGM) to manage the certification process of the Group. Groups are not limited by size, tonnage, or distance from each other (provided that the distances do not present a barrier to effective management and enforcement of the requirements of the program). All Groups must share similar production methods (marine cages, raceways etc.), and Hatcheries and Farms are not allowed to be included in the same Group. Groups must be composed of at least six, but not more than fifty member facilities

2.0 Introduction to GSA Standards

The GSA standards are achievable, science-based, and continuously improved global performance standards for the aquaculture supply chain that assure healthful foods produced through environmentally and socially responsible means. They are designed to assist program applicants in performing self-assessments of the environmental and social impacts, and food safety controls of their facilities, and to lead to third-party certification of compliance, thereby eliminating the most significant negative impacts.

For more information, please visit www.bapcertification.org.


Section B – Group Program Summary

1.0 Group Program Summary

The BAP Group Program is designed to accommodate all types of Farms/Hatcheries, regardless of size, species or culture methods, that can meet the eligibility and operational requirements for Group certification. The requirements for Group (as outlined in this document) entail establishment of an effective Group entity and strict operational and managerial controls at both the Group and individual member-site level. When facilities can demonstrate compliance with Group requirements, it allows BAP to accept a reduction in the number of onsite audits while preserving the integrity of the BAP scheme.

The Group management controls must be robust enough to instill a high degree of confidence during each phase of the audit, that compliance to all BAP requirements has been well established. Significant shortcomings during the certification audit, whether at Group management or member-site level in any phase of the audit will raise non-conformities against the entire Group entity/management. This is likely to result in suspension of the entire Group and ineligibility for certification unless all issues are corrected in accordance with the rules of the program.

Throughout this document, Farms/Hatcheries will be referred to as “facilities”, “sites” or Group “members”. Also, references to the “GSA Standard,” refer to the applicable Farm/Hatchery standard whose scope covers all of the member sites.

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The objective of the BAP Group Program is to specify the eligibility requirements, certification procedures and audit criteria to achieve certification to the applicable GSA Farm/Hatchery standard, as conducted by a BAP approved, ISO accredited, independent Certification Body (CB). The GSA Standards against which each facility must comply does not change with Group certification. They are the same standards against which individual Farms/Hatcheries must comply. The difference is that facilities under the Group Program outlined in this document must comply with additional requirements to be a legitimate, properly-functioning "Group."

Essential to the Group Program is the requirement for a centralized, Group Management System with strong controls and oversight over the member sites. The system of controls is commonly referred to as the internal Quality Management System (QMS). Compliance is ensured through rigorous application of the QMS and related BAP Group requirements throughout all member sites of the Group. Because of this common QMS system, the Group scheme assumes that not all member sites of the Group need to be audited by an external CB auditor annually. It cannot be overstated the importance of the QMS and its role in maintaining consistent adherence to the BAP requirements within the Group. Likewise, there needs to be recognition of the management resources required for develop, implement, and maintain the QMS and all related components, including the internal audit requirement.

The Group approach requires audits at various levels, summarized in the table below:

Group Audit Steps

Note: For the BAP Group Program there are a total of 5 audit steps. These 5 audit steps are common to all Group schemes

1. The Group's Own Internal Audits:

a. Internal Group QMS and related systems audit

b. Internal member site audits

2. External (CB) Audits of the Group:

a. Phase I: CB QMS audit (remote desk audit)

b. Phase II: CB on site audit of Facility Group Manager office

c. Phase III: CB on site audit of selected member facilities

Some advantages of the Group Program are:

- Provides for the effective self-governance of the Group with limited external oversight through third party audits.
- Where compliance is demonstrated, it reduces the number of individual facilities that must be 3rd party inspected annually for certification, and thereby reduces audit time and costs.
- Allows multiple sites to be certified at once, provided that the entire Group is in compliance.

There are however significant pre-requisite requirements and considerations for an effective Group Program and for Group applicants:

- Substantial applicant administrative effort to develop, implement and effectively manage the Group (if such systems are not already in place).
- Knowledge of the relevant GSA standard and Group requirements by all member sites.
- Training of the Facility Group Manager (FGM) and the Group's internal facility auditors to properly enforce and oversee 100% member-site compliance.
- All members of the Group shall remain in compliance to achieve initial certification and to avoid suspension of certification during subsequent re-certification audits.
- Group entity shall provide sufficient resources to comply with the GSA standards.
- The FGM shall properly enforce and oversee member compliance, overall operation of the QMS system and proper conduct of internal site audits for 100% of the member-sites.

Section C – Certification Body Requirements

1.0 Purpose and Procedure

This section describes the requirements that must be adhered to for Certification Bodies (CBs) to:

- accept a Group audit assignment from the BAP.
- conduct a Group audit from beginning to end for all new/renewal applications using the following documents:
- Farm and Hatchery Group Program


Plus, the appropriate GSA Standard for the facilities applying:

- Farm Standard
- Mollusk Farms
- Salmon Farms
- Finfish, Crustacean and Mollusk Hatcheries & Nurseries

Scope: The Group Program covers any facilities which qualify for BAP Certification through one of the above-mentioned GSA Standards. The Certification Body must be approved by BAP and must be in the accreditation as a minimum in the accreditation extension process with their Accreditation Board.

Aside from qualifying under a GSA Standard, any applicant who wishes to certify multiple facilities under the Group Standard must comply with the additional clauses covered under the Group Standard itself to be eligible for certification.

Method: Upon receipt of an opportunity to audit against the Group Standard from the BAP, CBs must assess whether they have the capabilities to undertake this audit type. All BAP CB's must meet eligibility requirements defined in BAP's CB Requirements Document. CB-assigned auditors must also meet BAP's

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Group auditor qualifications to be eligible to audit against the Group Standard. These additional qualities require the auditor to meet the following criteria (in addition to being a certified BAP auditor):

- Be an active “senior” auditor in the Standard Type the Group will be audited against. The requirements for a BAP Senior auditor can be found in the CB Requirements Document.
- Must participate in, and pass, an official BAP Auditor Training Course for Category 7 – Group and hold a valid certificate from the BAP program.

If the CB does not have auditors that meet the minimum qualifications to conduct the Group Audit, the audit must officially be rejected by the Certification Body, and this decision must be communicated to the BAP Operations Manager.

If the CB determines they meet the minimum requirements to conduct this type of audit they shall review the application for completeness, accuracy and that the facilities applying for Group fall within the scope of the Group Document and the applicable GSA Farm and/or Hatchery standard type.


- All Group Applications are initially vetted by BAP Management to determine their eligibility for the Group Program before being assigned to a CB. This proposal for audit is put forward by BAP to the Certification Body, but it shall be the Certification Bodies’ responsibility to validate the Group Application. Any proposed Groups that do not meet approval by the Certification Body shall be rejected and applications returned to BAP for reconsideration.

Arranging Audits: The CB shall select an eligible auditor from their list of approved auditors that meet the requirements to conduct a Group audit as detailed above. The CB shall be responsible for conducting any pre-audit checks by contacting the applicant directly to determine the readiness for audit and agree upon a mutually agreeable date for the audit. The audit date shall be confirmed along with a site audit schedule as outlined in the Group Standard Document. Written confirmation of the audit schedule shall be sent to the applicant. The CB shall forward an authorization to audit and a site audit schedule, to the Facility Group Manager listed in the application.

If the CB determines that the results of the pre-audit check is not satisfactory the CB shall contact the BAP CB Manager for further instructions and shall not continue with scheduling the audit until BAP determines that the facility is ready.

Audit Procedures: Audits shall be conducted using the criteria set out in the following documents:

- Farm and Hatchery Group Program – This document is the Standard to which the auditor assesses the farm or hatchery Group’s compliance with the BAP Group Program. The auditor shall ensure that the applicant complies with these clauses to gain a certificate of approval. The Group Audit shall be:
- Conducted in three distinct phases as outlined in the BAP Farm and Hatchery Group Program Document.
- The applicable GSA farm or hatchery standard for the facility types. – When conducting the sampling of on-site facility audits (as mandated by the Farm and Hatchery Group Program) the auditor shall use the appropriate Group checklist, provided by BAP, for the facility type being audited.
- BAP CB Requirements – This document covers all requirements of the CB for audit procedures as outlined under the section entitled “The Evaluation Process.”
- Certification Bodies BAP Process Document -The CB shall ensure that their own internal process document complies with BAP requirements and have records to demonstrate this.

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In the case of Group, the length of the audit shall be proposed by the BAP Operations Manager and agreed by the CB in accordance with Farm and Hatchery Group document guidelines and the minimum requirements for on-site facility audit durations as noted in the CB Requirements Document.

The auditor shall use only the Group Checklist supplied by BAP to the CB to complete their audit report for the applicable facility types.

Audit Frequency: The Group Program shall be an annual audit in all cases except for the Salmon Standard which shall have a two-year certificate with a surveillance audit as described in the Salmon Surveillance Audit Annex for the Group Program.

Preparation for Certification: Before a certificate of compliance is awarded the CB shall carry out a review of the audit reports to ensure that all requirements in the Group Program have been met and that all site audits conducted against one of the GSA Standards are complete. All non-conformities must be closed according to BAP and CB guidance documents before a certificate can be awarded.

Once complete, CBs shall send to the BAP Program a complete Audit package that includes the following items:


- Complete Audit Report.
- Non-conformity summary and corrective action sheet.
- Any applicable tests that were conducted as mandated by the Group Program Document or a GSA Standard itself.
- A signed and completed certificate that complies with the Certificate Content section of the CB Requirements Document.

Section D – Group Participant Requirements

1.0 Group Structure and Eligibility Requirements

1.1 Overview

- 1.1.1. There shall be a designated Group entity authorized to apply for certification on behalf of the Group and its members. The entity shall also have the authority to represent and oversee the Group. This entity can be a company, association, co-op etc., as long as it has the authority to exercise control over the Group members and ensure compliance with all elements of the BAP program.
- 1.1.2. The entity applying for Group certification shall, at first, conduct a self-assessment of the Group management system and potential Group members to ensure all elements of the applicable GSA standard and all details of the BAP Group Program requirements described through this document can be met.
- 1.1.3. The proposed Group entity shall demonstrate an understanding of Group scheme requirements through their application, such that it is likely that they will be able to qualify for certification.
- 1.1.4. The entity, Facility Group Manager, and individual sites shall first develop and implement any missing component of the Group program described above PRIOR to applying for Group certification. (BAP may provide assistance to understand the requirements).
- 1.1.5. The Group entity, Facility Group Manager and individual member sites shall correct any deficiencies prior to applying for certification and ensure continuing compliance with all certification requirements throughout the duration of the certificate, and all subsequent recertifications.

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1.2 Structure and Authority

- 1.2.1 Participating sites shall be members of a registered entity (Group)
- 1.2.2 The Group may be comprised of independently owned Farms/Hatcheries, or it can be made up of facilities that are owned or leased by a common entity(s). In either case the Group shall have in place all of the elements described throughout this document.
 - 1.2.2.1 Extensive, unfed aquaculture Farm production of less than 1 MT/hectare/year may be allowed at BAP's sole discretion, following a review of facility locations, production tonnages, and documented organization structure by combining individual farms into sub-groups/societies/cooperatives, which will be treated as the **unit of certification**. Any such combination of farms must receive initial approval in advance by BAP, and maps and GPS locations for all farms, showing the proposed combinations of farms into units of certification must be provided to BAP. Certification Bodies must review the details of such sub-groupings and advise BAP of any concerns.
 - 1.2.2.2 Farms forming sub-groups/societies/cooperatives must be located in close proximity to one another, sharing the same incoming water source and outgoing water receiving body, and may have not more than 15 minutes travel time (by land or water) between the most distant farms that will form the **unit of certification**.
 - 1.2.2.3 Sub-groups/societies/cooperatives must show evidence of having a formalized system of collaboration, which could include for example coordinated stocking and harvesting, agreed farm management practices, and a formal Quality Management System.
- 1.2.3 All sites shall use the same written language that is understood by all member sites. Or, if translations are provided, there shall be document control procedures that explain methods to ensure all versions are current.
- 1.2.4 The Group entity shall have authority over every member site as a condition of their membership, to form legal contracts or written agreements with each of them, to represent the Group, enforce rules and impose sanctions against Group members.
- 1.2.5 The Group entity shall appoint a Facility Group Manager (FGM) and provide the FGM with adequate resources and staff to assist in all aspects of the management and compliance of the BAP Group members and documentary systems.
- 1.2.6 The FGM shall have the authority to enforce all GSA Standard and Group Program requirements on behalf of the Group and over each member.

1.3 Contracts or Written Agreements:

The Group entity shall have in place the following contracts or written agreements:

- 1.3.1 Between the Group entity and BAP, whereby the Group entity shall be the holder of the BAP Certification.
- 1.3.2 Between the Group entity and the BAP approved independent ISO Accredited Certification Body.
- 1.3.3 Between the Group entity and every member of the Group. Contracts or written agreements (especially for sites not owned by the Group entity) shall stipulate, at minimum, the following points:

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- a. Name of the Group
- b. Member Farm/Hatchery name
- c. Farm/Hatchery owner, contact information, postal address, telephone and fax number, email address, and relationship to processing facility, if any
- d. Facility physical location, including GPS coordinates of the legal boundaries
- e. Facility business address
- f. Facility government registration number
- g. Agreement between the member facility/site and the Group entity to include but not limited to: adhere to all elements of the GSA Standard and the Group Program elements including documentary, testing and record keeping requirements; cooperation with the FGM and Internal Auditor; the resolution of all non-conformities uncovered by the Group Internal Auditor or the BAP CB according to time limits; and complying with all sanctions, suspensions or removal from the Group imposed by the Group entity or FGM.
- h. The contract or written agreement between the member sites and the Group entity shall be signed and dated by both parties.

This information shall also be supplied at the time of the BAP Group application for each member facility.

- 1.3.4 All member sites shall agree to the following provisions, which shall also be contained in the contract or written agreement between the Group entity and the individual member sites:
 - a. All sites shall agree to be listed
 - b. All sites shall agree to provide access for audits by the Group's Internal Auditors, BAP management, the CB, and the CB's auditor.
 - c. Allow the CB's auditor and BAP to make unannounced audits.
 - d. Agreement between the Group entity and Group members that the CB and BAP will be immediately informed in the case of any additions of members to the Group, or suspensions or removals of members.

1.4 Registry

- 1.4.1 A registry shall be maintained of all member sites of the Group, including details concerning any Sub-Groups involving multiple farm units. The registry shall be maintained and kept up-to-date and shall be supplied to the BAP during application for certification or recertification (the Auditor is to include with the audit report a copy of the current list of members and the structure of the Group at the time of the audit).
- 1.4.2 The registry shall include, for each member site, the following information at minimum:
 - a. Facility name
 - b. Facility owner, contact information, postal address, telephone/fax number, email address and relationship to processing facility, if any
 - c. Products produced

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- d. Volume of product for most recent calendar year. For farms this means **whole animal weight** in MT. For hatcheries this means **quantity of live aquatic products** shipped from the hatchery to either the facility's own grow-out farms or to outside hatchery/nursery/grow-out farm clients. Products shipped internally to the company's own intermediate hatchery/nursery phases need not be included.
- e. Facility physical location, including GPS coordinates of the legal boundaries
- f. Facility business address
- g. Facility government registration number
- h. Number of ponds, tanks, raceways or cages/net pens at the facility

1.5 Size and Production Methods of Member Facilities

- 1.5.1 There is no size limitation for member facilities based on either the tonnage produced or the physical size of the facility or individual production units. However, member facilities are required to use similar production practices as described in the GSA Farm/Hatchery Standards (land-based extensive/semi-intensive/intensive flow-through systems, land-based intensive water-reuse systems, cages in various types of water bodies, etc.). For example, a Farm/Hatchery Group could not consist of a mixture of land-based pond operations and marine farm cages. An exception to this rule may be made, at BAP's sole discretion, for "multi-phase" hatchery operations that operate multiple styles of facilities as part of their breeding process – e.g., cages for juvenile and adult animals for broodstock production, land-based raceways or tanks for broodstock maturation and spawning, egg hatching, and nursing of juvenile stages.

1.6 Number of Member Sites Per Group, and Their Proximity

- 1.6.1 The minimum number of members in a single Group is 6 unless otherwise approved in writing by BAP. Special consideration concerning these limits in size may be allowed on a case-by-case basis by the BAP when arrangements have been made by a sponsoring organization for simultaneous certification of multiple Groups of facilities of different types (Farms and Hatcheries), or of multiple Groups of facilities of the same type within different regions of the same country. *See Section 4.8 for specific instructions concerning number of Phase III site audits to be done in such cases.*
- 1.6.2 The maximum number of members in a single Group is 50, but in exceptional cases may be higher, assuming that a careful risk assessment has been completed and has been approved in writing by BAP.
- 1.6.3 The Group's members shall be in the same geographical region. In cases where more remote sites have been included in a Group, a risk assessment / justification must be presented to BAP for approval in writing at the time of application. A Group must normally be limited to the same region, bay system, etc. as applicable.
- 1.6.4 The Group entity shall carefully consider the number of member sites, their locations and how spread-out they are, and the impact of these factors on the Group's ability to manage and enforce requirements over all members when forming the Group. The Group entity shall have a documented risk assessment/justification that explains how these factors were considered in forming the Group, and how proper control and oversight at each site is ensured.


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Notes - on the importance of determining the Group size and member locations:

- a. Every member site shall be able to be readily accessed and be fully and properly managed for the Group scheme to work. If the Group is so large that proper management, communication, and coordination are not possible, the Group risks suspension of their certification.
- b. The distance between members of the Group shall be carefully considered when forming the Group. Facilities that are too far away for the Group entity and FGM and their designees to visit, conduct the internal audits, manage, and ensure compliance will jeopardize the certification for the entire Group. The risk of suspension of the entire Group is significant where Groups are too large or too distant from one another to be effectively managed so that compliance is assured.
- c. Too many member sites that are too far away from each other also increases the time and costs and reduces the efficiency for both the FGM and internal audits/auditors, and the external (CB) auditors. The added costs of long distances should be carefully considered.
- d. A large, vertically integrated Group, or a Group entity with facilities in many parts of a large country, may wish to consider Grouping by region or defining feature (such as a bay). In such an instance, each region or bay with several sites would be its own Group, with a separate QMS, FGM, etc. Multiple, smaller Groups, each with members that are reasonably close to each other managed by a separate FGM may be more manageable compared to one very large, spread-out Group. This may allow for less administrative time/cost, and reduced burden in executing the internal audits at every site every year. It also may reduce the risk of suspension of the entire Group due to too many sites spread across too many regions within a single Group.

1.7 Adding and Removing Member Sites

- 1.7.1 The Group FGM or Group entity shall be authorized to manage the process of adding and removing members from the Group, or adding and deleting facilities from the Group Registry.
- 1.7.2 **Adding:** Initial Certification: additional members shall not be added to the Group once the Group application has been submitted to BAP.
- 1.7.3 **Adding:** Recertification: for certified Groups, additional members shall only be added at the time of the recertification/surveillance application. (Changes/additions to the Group members shall be received by the BAP office no later than two months prior to the external audit date.
- 1.7.4 The Group entity shall ensure that all new member Farm/Hatchery applicants have had an internal audit against the requirements of the applicable GSA Farm/Hatchery standard and the BAP Group requirements in this document and all non-conformities have been properly corrected/closed before they are accepted as new members by the Group.
- 1.7.5 There shall be clear and unambiguous, documented rules and procedures for the addition of new members to the Group.
- 1.7.6 **Removing:** Member facilities can, and shall, be removed at any time if they show themselves unable or unwilling to comply with the Group and GSA Farm/Hatchery Standard requirements, and the contractual (or written agreement) provisions of the Group. The Certification Body and BAP shall be informed immediately by sending an updated registry, details of removed facilities, and the reason for the removal. (See "Sanctions and Suspensions" later in this document for further details).

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1.7.7 **Escalation Process for Member Sites:** There shall be clear and unambiguous, documented rules and procedures for disciplining and/or removing members from the Group. These rules shall include an escalation process for actions taken, and at what point the member is to be removed from the Group where the member is repeatedly not complying with requirements. This shall take into consideration, situations such as but not limited to, the member:

- Is not responding to, or cooperating with, the Group entity, FGM or his/her designee, or the Internal Auditor(s) on any issue.
- Is not providing the information requested in a timely fashion.
- Is not cooperating with the need to have an internal audit, and/or continually delaying the process.
- Is not providing corrective action evidence and closing non-conformities in a timely fashion.
- Has a pattern of excessive non-conformities at either the internal or external (CB audit) level.

1.8 Scope of Group Certification – (No Exemptions)

1.8.1 BAP Group Certification shall cover all products produced by the Group and its members and no portion of the Groups production or its facilities are exempt from inspection.


1.9 Organizational Chart/Document

1.9.1 The Applicant shall have in place an organizational chart or document that defines:

1.9.1.1 The relationship between the Group entity and each of the sites (wholly owned, partially owned, leased, contracted, etc.).

1.9.1.2 The organizational structure that reflects current Group management and the QMS control hierarchy. At minimum, the organizational structure shall specify the following:

- a. Overall management of the Group, including the Group entity, Group members, size and structure, FGM(s) and his or her designees/assistants.
- b. A description of how the responsibilities for compliance with the BAP Group Program requirements and applicable GSA Farm/Hatchery Standard will be divided between the Group entity and individual member sites.
- c. The above and any other key personnel responsible for elements of compliance with the Group Program, applicable GSA Farm/Hatchery Standard, and all related QMS and documentary components.
- d. Who is responsible for the development and modification of the QMS and its components.
- e. Who is responsible for conducting internal audits of the content, implementation, and effectiveness of the QMS, and compliance with it, as in 3.1. (Note– See 2.5.1.3.2. This cannot be the same person as “d” above).

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- f. Who is responsible for conducting internal audits of the member sites against the applicable GSA Farm/Hatchery standard (as in 3.3), and who the Internal Auditor(s) report to.
- 1.9.2 There shall be a brief description of the key responsibilities and authorities of the positions described above in ensuring compliance with all BAP Group and GSA Standard requirements.
- 1.9.3 There shall be designated and properly trained back-up staff to cover for the absence of key personnel (such as the FGM, Internal Auditor(s), etc.).

1.10 Language Requirements (Non-English-Speaking Group Applicants)

- 1.10.1 The Group entity shall have at least one person on staff with the ability to translate the documents required at Phase I into English and send them in a timely fashion to the CB auditor, in the event that auditor is English-speaking only. See 4.3.1 for the documents required to be sent in English at Phase I (This person shall also be available to translate any additional documents into English if requested by BAP or the CB).
- 1.10.2 The Group entity shall have at least one person on staff capable of communicating in English (verbally or in writing) with BAP or the CB on behalf of the FGM, in the event the FGM does not speak English (in order to enable the FGM to ask or answer questions on behalf of the Group with BAP or with English speaking CB's or auditors).

2.0 Group Quality Management System (QMS), Related Components, and Effectiveness


2.1 QMS Development and Effective Implementation

- 2.1.1 The Group entity shall properly develop and effectively implement a Quality Management System at both the Group management/oversight level and at the individual sites that include and ensure compliance with the requirements of the BAP Group Program (this document) and of the applicable GSA Farm/Hatchery Standard. (See 2.5.1 regarding the responsibilities of the FGM, the development of the QMS, and the conducting of internal audits for Group compliance with the QMS).

2.2 QMS Update and Review

- 2.1.2 The Group entity shall ensure all components of the QMS are reviewed and updated as often as necessary. This shall take place at a minimum, annually.

Notes - QMS Definition: The Group shall have in place, and effectively manage, implement, and update, all documentary systems, records, procedures, and rules necessary to comply with BAP and manage the Group. These include all elements of the BAP Group Program (this document), and the applicable GSA Farm/Hatchery Standard. This system of documents, procedures, records, etc. and related components, is referred to as the Group's Quality Management System (QMS). The QMS shall be developed and effectively implemented by the Group entity for the Group management overall and at the individual site level. All Group members shall agree to the

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conditions of the Quality Management System and provide the logistical and administrative support necessary for its implementation.

Notes - Summary of QMS Components: The QMS and its related components consists of:

- The documents, records, test results, etc., described in the applicable GSA Farm/Hatchery Standard.
- The documents and records described in section 1, such as contracts or written agreements, registry of member sites, the organizational chart, and so on.
- The documents, records, procedures and policies described in this entire section (section 2). Such as but not limited to – a QA Manual, Documentary Control procedures, Training Records, Complaints Handling, Management Reviews, etc.
- The documents, records, procedures and policies described in section 3 related to the Group's Internal Audits. Which include but are not limited to – Internal Audit Reports, records of non-conformities, corrective actions and evidence used to close, follow up actions in the case of continued non-conformities, sanctions or suspensions imposed by the Group on any of its members, records of Group and individual site responses to Certification Body findings, etc.
- The documents and records associated with demonstrating FGM and Internal Auditor competency and training, as described in the "Personnel" section below.

2.3 Management Commitment, Provision of Resources, and Management Review

- 2.3.1 Senior management from the Group entity and Group members shall take the responsibility to ensure the establishment, implementation, and maintenance of the management systems that provide effective internal controls for all activities required for conformity and continuous improvement with all elements of the BAP Group Program requirements, and the applicable GSA Farm/Hatchery Standard.
- 2.3.2 Management commitment shall also be demonstrated through the timely provision of all resources needed to effectively implement, comply with and improve upon all elements of the Group's policies, QMS, BAP Group Program and applicable GSA Farm/Hatchery Standard requirements. This includes ensuring adequate personnel and their training.
- 2.3.3 The Applicant's senior management shall review all components of the QMS, such as but not limited to the Group contracts or written agreements, procedures, Quality Manual, Documentary Control and records, Group QMS and individual member site internal audit reports, corrective actions, policies for adding, removing and sanctions, etc., to ensure its continuing effectiveness in complying with all elements of the Group rules, Group Program requirements and applicable GSA Farm/Hatchery Standard. This review shall take place at a minimum, annually.
- 2.3.4 Minutes of the management review shall be maintained. Deficiencies in any systems or Group member compliance, revisions to procedures or records, corrective actions, time frames and follow up actions, shall be clearly documented.


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2.4 Quality Manual

- 2.4.1 The Applicant shall have an appropriate Quality Manual which incorporates policies and procedures that address all sections of both the applicable GSA Farm/Hatchery Standard and the BAP Group Program. The Quality Manual may include all components or may reference separate, related documents within it. The Quality Manual shall be readily available to those personnel who will need to refer to its contents.
- 2.4.2 Within the Quality Manual, there shall be a clearly documented Quality Policy Statement that commits the organization to compliance with all elements of the GSA Standard and Group Program requirements.
- 2.4.3 The Quality Manual shall describe how the BAP, and BAP Certification Body requirements, are communicated to member sites, and how changes in requirements are implemented at the Group entity and member site levels.
- 2.4.4 The Quality Manual shall be available in the predominant language of the member site's staff and workers.

2.5 Personnel

- 2.5.1 Facility Group Manager (FGM) Qualifications, Training, and Functions (See also 4.1.3)
 - 2.5.1.1 The FGM shall meet the qualifications and training requirements described below:
 - 2.5.1.1.1 Have a post-high school degree or diploma in a subject related to aquaculture, and, 2 years of practical experience on Farms/Hatcheries. Where there is no relevant degree, experience is acceptable in lieu of a degree providing it is a minimum of 3 years at a supervisory level.
 - 2.5.1.1.2 Shall demonstrate in-depth knowledge of both the applicable GSA Farm/Hatchery Standard AND the BAP Group requirements.
 - 2.5.1.1.3 Have the ability to manage, oversee, enforce, and train Group members and Internal Auditors regarding the requirements.
 - 2.5.1.1.4 Have completed an external training course on the principals of, and management of, internal audits of at least 8 hours duration and be able to demonstrate proficiency in the conducting and management of audits and the Group's Internal Auditors.
 - 2.5.1.1.5 Complete continuing education or professional development of at least 2 days every 2 years (Some examples: additional auditing course, food safety or GMP seminar or workshop, disease management, an aquaculture seminar, regulatory update seminar, etc.). This may include, at BAP's discretion, the taking of an online exam regarding BAP requirements.
 - 2.5.1.1.6 Have good communication and organizational skills.
 - 2.5.1.2 The FGM shall have sufficient staff appointed, as necessary, to carry out all aspects of the proper management and compliance of the Group. This includes the appointment of enough, properly qualified Internal Auditors to conduct the internal audits properly and timely, as described later in this document. (Note – per 1.9.3, there shall be 2 persons minimum, qualified to fulfill the FGM functions – the FGM and his or her back-up person.

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Similarly, there shall be a minimum of 2 Internal Auditors qualified to fulfill the internal audit functions per 1.9.3).

2.5.1.3 The FGM, or his/her designee(s), shall have the support, authority and resources to manage all aspects including, but not limited to the below elements, described in detail later in this document:

2.5.1.3.1 Ensure proper development and implementation all components of the Quality Management Systems (QMS), at every site.

2.5.1.3.2 If the FGM is responsible for developing or modifying any, or all, of the documentary components of the QMS system, the Group entity shall appoint another qualified person other than the FGM to conduct the internal audits of the QMS required under 3.1. Conversely, where the FGM conducts the QMS internal audits, the Group entity shall appoint another qualified person(s) to develop and modify the QMS, including all of its components.

2.5.1.3.3 Manage and have the authority over additions and removals of Group member sites, and of imposing sanctions or suspensions of its members. Shall communicate and coordinate with, (or appoint a qualified designee), the BAP approved Certification Body and with the BAP.

2.5.2 The Group's Internal Member Site Auditor(s) (Qualification and Training) (See also 4.1.3)

2.5.2.1 The Group shall clearly name the person or persons who, irrespective of other duties, will perform the function of the Group's Internal Site Auditor(s).

2.5.2.2 The Internal Auditor(s) shall meet the qualifications and training requirements described below:

2.5.2.2.1 Shall have a high school diploma, or above

2.5.2.2.2 Have a minimum of 2 years of in-depth experience in aquaculture Farm/Hatchery operations


2.5.2.2.3 Have good communication and writing skills and the ability to write an internal audit report.

2.5.2.2.4 Have studied the applicable GSA Farm/Hatchery Standard and BAP Group Program. After study, shall have undergone sufficient training by the FGM to ensure proper knowledge is demonstrated. Training in these BAP requirements by the FGM shall be at least 16 hours in duration, and refresher training in these requirements shall be conducted every 3 years for all Internal Auditors.

2.5.2.2.5 Have undergone training by the FGM in how to conduct an internal audit of at least 8 hours.

2.5.2.2.6 Have done at least 2 site internal audits under the supervision of the FGM before being approved as an Internal Auditor. Approval is contingent upon proper performance of the audits. Additional audits for training shall be conducted beyond 2 where proficiency is not demonstrated.

2.5.2.3 A list of the Group's Internal Auditors shall be maintained and kept up to date. Both the CBs and BAP shall be provided with an updated list of Internal Auditors whenever there is a change.

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- 2.5.2.4 There shall be a policy, that is enforced, that prohibits an Internal Auditor from auditing a Farm/Hatchery that he or she works for, or has, or his or her family has, any ownership share in. Additionally, where an Internal Auditor assists any Farm/Hatchery or Farms/Hatcheries in implementing the Group or GSA Farm/Hatchery Standard requirements, or in correcting deficiencies, that Internal Auditor shall be prohibited from performing the internal audit of that Farm/Hatchery or Farms/Hatcheries. (Per 1.9.3 another Internal Auditor shall be used).
- 2.5.3 The FGM and Internal Auditors shall have received proper training as outlined under “Personnel” above. This training shall be documented. Site member staff responsible for implementation of the Group Program requirements and QMS shall have received adequate training from the FGM, FGM’s staff or Group entity in the GSA Standard and Group requirements. Training records for all persons involved with the administration of the QMS shall be available for the CB external audit.

2.6 Document Control – General Documents Requirements


- 2.6.1 The Applicant shall ensure that all documents, records and data critical to all of the elements of the Group requirements and GSA Standard are in place and effectively controlled.

2.7 Document Control

- 2.7.1 Written document control procedures shall be in place either within the Quality Manual or referenced within the Quality Manual. A designated person or persons shall be appointed by management to maintain Document Control.
- 2.7.2 All controlled documents and all documents relating to the administration of the QMS shall have a unique identifier which includes issue number and date with appropriate page sequence numbers.
- 2.7.3 Documents (i.e. procedures, manuals, policies) shall be retained for a minimum of the crop cycle + 2 years.
- 2.7.4 Document Control Procedures will include control of all Policies, Procedures, Manuals, Records and data critical to the management of the QMS, and Quality Manual.
- 2.7.5 A current version of the applicable GSA Farm/Hatchery Standard shall be kept at all member facilities and be always available for reference purposes.

2.8 Record Keeping

- 2.8.1 The Applicant shall maintain records, documents and procedures to demonstrate the effective control of the QMS as well as performance against both the applicable GSA Farm/Hatchery Standard and the BAP Group Program.
- 2.8.2 Records (i.e. forms, checklists, monitoring and training records, etc.) shall be retained for a minimum of the crop cycle + 2 years.
- 2.8.3 All records and other documentation shall not show evidence of falsification.

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- 2.8.4 All QMS records shall be reviewed by a QMS-trained individual. Internal audit reports shall be reviewed by a trained management individual not involved in the actual audit, such as the FGM or his/or designee.

2.9 Complaint Handling

- 2.9.1 The Applicant shall prepare and implement an effective system for the management of complaints received from customers of any of the Group's members. Complaints shall be documented.
- 2.9.2 The Complaint Handling procedure shall state how complaints are investigated and what follow-up was performed. Including recording of any corrective actions taken to resolve the complaint.


3.0 The Group's Internal Audits

3.1 Internal Quality Management System (QMS) and Related Systems Audits

- 3.1.1 The Quality Management System and related components shall be audited by the FGM (or his/her designated Internal Auditors or Group entity appointee if the QMS was developed or modified by the FGM) at least once annually. The purpose is to test the overall effectiveness and implementation of the QMS system and related components as required by the BAP Group Program and applicable GSA Farm/Hatchery Standard. The audit results shall be provided to all of the management personnel associated with the Group in order to ensure all non-conformities are corrected in a timely fashion, and in all cases prior to the external CB audit.
- 3.1.2 The Internal QMS audit shall be conducted using the BAP Group Audit Checklist. (The relevant sections being what is referred to for the CB external audit purposes as Phase I and Phase II.
- Note:** This is the same checklist used by the CB, except for the tables at the end (tally/3 tables). These tables are used to tally non-conformities issued by the CB auditor at each phase. The numbers are then used to determine the overall effectiveness of the Group's management and compliance with the requirements. As described in that section of the checklist and in Section 4 of this document, where there are too many non-conformities it results in additional non-conformities raised against the Group, which may result in Group suspension. While this is applied at the External CB audit level, the Group should take such criteria into consideration during its internal audits as well in determining the need for improvements.
- 3.1.3 The above annual audit shall be completed, along with the management review, **PRIOR TO** the CB External audit, and this information made available to the CB auditor and BAP upon request.

3.2 Internal QMS and Related Systems Audits – Non-Conformities, Corrective Actions, and Suspensions

- 3.2.1 Where any non-conformity is assessed during the internal audit of the Group's QMS and related systems, the FGM and Group entity shall ensure proper and immediate corrective action is implemented.
- 3.2.1.1 **Major and Minor** – non-conformities shall be corrected, with the root cause identified and addressed to prevent future reoccurrence, prior to the CB external audit.

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3.2.1.2 **Critical** – where a critical failure has been detected regarding the proper development, implementation and effectiveness of the QMS and related components, such that compliance with the BAP Group Program and applicable GSA Farm/Hatchery Standard is significantly lacking, the FGM or his/her designee shall:

3.2.1.2.1 IMMEDIATELY inform the Group entity and ALL Group members.

3.2.1.2.2 New applicants not yet certified – the Group shall undertake to immediately correct the problem(s).

3.2.1.2.3 Certified Groups - The Group shall IMMEDIATELY suspend all member sites and instruct them that none of the product is to be considered BAP certified and to STOP claiming BAP certification for any crops they are producing.

3.2.1.2.4 Certified Groups – the Group FGM or Group entity shall IMMEDIATELY inform BAP Management.

3.2.1.2.5 Certified Groups and their member sites shall remain suspended until evidence is submitted demonstrating proper corrective action has been taken. Including identification of the root cause of the systems failure and how reoccurrence will be prevented.

3.3 Internal Member Site Audits

3.3.1 There shall be an annual plan and schedule for internal audits of all member sites in the Group. The scope of the site internal audit shall include site conformity to the applicable GSA Farm/Hatchery Standard. Groups shall maintain a register of member sites that summarizes each member's relevant registration data and shows dates and results of the current year's internal and, if applicable, external audits.

3.3.2 The internal member site audits shall be scheduled in such a way as to ensure their completion, and any resolution of deficiencies, in advance of the facility applying for certification, or recertification, and in all cases, **PRIOR** to the recertification date expiration.


3.3.3 The Internal Auditor shall use the authorized BAP audit checklist for the internal audits of the member sites. This is the checklist for the applicable Farm/Hatchery standard, and is the same checklist used for the CB External audit.

3.3.4 A written summary of the non-conformities found at each site during the internal audit shall be prepared and left with the member Farm/Hatchery at the time of the audit completion, or no more than 2 business days following the internal site audit. The auditor who performed the audit shall be stated.

3.3.5 A copy of the Internal Auditor's summary of non-conformities shall be forwarded to the FGM and/or his or her representatives promptly upon completion of each audit.

3.3.6 A formal audit report shall be prepared and submitted within ten days of the audit completion to the FGM and member site.

3.3.7 Internal audits should be performed only by the Internal Auditors, not the FGM, due to the involvement of the FGM in the disciplinary and decision-making processes outlined in Sections 3.4 and 3.5 of this document. In case any internal audits are conducted by the FGM, the Group must

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provide justification in writing and ensure that the FGM adheres to the requirements concerning Impartiality and Conflict of Interest described under 3.5.2.

3.4 Internal Member Site Audits – Group’s Self-Imposed Sanctions

3.4.1 **Non-Conformity Definitions:** Non-conformities raised during the internal audits shall fall into one of the following three categories:

3.4.1.1 **Critical** – Where there is a Critical failure to comply with a legal, environmental, and social or food safety issue. Or a critical failure to comply with one or more fundamental requirements of the GSA Standard or BAP Group Program to the extent that it results in a risk to the integrity of the Scheme. This would also include situations where there is a fundamental breakdown in the site’s programs and systems to the extent that there is a critical overall failure to comply with the applicable GSA Farm/Hatchery Standard or BAP Group Program requirements.

3.4.1.2 **Major** Where there is a substantial failure to meet the requirements of the intent of any clause of the applicable GSA Farm/Hatchery Standard or BAP Group Program. But there is no Food Safety risk, issue of legality (including social responsibility requirements), fundamental systems failure, or immediate risk to the Integrity of the Scheme.

3.4.1.3 **Minor** Where absolute compliance to the clause or intent of the applicable GSA Farm/Hatchery Standard or Group Program requirements has not been demonstrated. Typically, minors would be technical deficiencies, small missing elements, small record-keeping errors, or similar minor matters.


3.4.2 **Non-Conformities, Corrective Actions, and Group Sanctions or Suspensions** Against Member Sites:

3.4.2.1 **Closure of Non-conformities:** All non-conformities (critical, major, and minor) shall be satisfactorily resolved before the CB external audit.

3.4.2.2 **Corrective Actions, and Closure of Non-Conformities:** Proper closure of non-conformities is accomplished through the sites submitting to the FGM or his/or designees, sufficient objective evidence that each non-conformity was properly resolved within the proper time frames. Proper objective evidence includes records, revised documents or procedures, test results, training, pictures, and so on. The evidence shall clearly show that the matter was corrected AND that the root cause was also properly identified and corrected to prevent future re-occurrence. (*Root cause = why did the problem happen in the first place, and how will the Group ensure it won’t happen again in the future?*).

3.4.2.3 Procedures, Corrective Action Time frames, and Sanctions, Suspensions or Removal from the Group for Non-conformities:

3.4.2.3.1 **Critical** – Critical non-conformities found during internal audits of sites shall result in **IMMEDIATE** suspension by the FGM and Group entity, of the site from the Group. The FGM and/or his/her designees shall immediately undertake when a site critical is found, an investigation to determine if the incidence is isolated, or if it may also exist at one or more other member sites. Where it is found to affect other member sites, they too, shall be **IMMEDIATELY** suspended.

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The site(s) shall undertake corrective action as described above and submit proper evidence to the FGM or his/her designee within 28 calendar days of the non-conformity notification.

Where that time frame is not met, the site remains suspended. If the site has not undertaken proper corrective and preventive action within 6 months, the site shall be **REMOVED** from Group membership for a period of a minimum of 12 months. The site shall not be permitted to reapply to the Group after 12 months unless they can demonstrate, to the satisfaction of the Group and FGM that they are able and willing to comply with all Group, BAP Group Program, and applicable GSA Farm/Hatchery Standard requirements. The decisions to suspend or remove sites shall be undertaken by the decision-making panel as described below.

- 3.4.2.3.2 **Major** – Major non-conformities shall also be corrected within 28 calendar days, following the procedures described previously. Where this time frame is not met, the non-conformity shall be raised to a CRITICAL and the site suspended. The procedures under “critical” above, apply.
- 3.4.2.3.3 **Minor** – Minor non-conformities should be corrected within 28 calendar days as well. However, at the Group and FGM discretion, a longer period may be permitted.
- 3.4.2.3.4 **Closure Prior to CB External Audit** – All non-conformities for Group members shall be properly corrected prior to the CB External audit, as previously explained. For Criticals, where time frames are not met, including before the external audit, the site shall remain suspended or be removed from the Group as noted above. For Major and Minor, regardless of corrective action time frames, if the non-conformities are not resolved in time for the external CB audit, the site shall be suspended.

3.5 Internal Site (Member Farm/Hatchery) Audits – Decision Making and Impartiality

- 3.5.1 **Review Panel** - A review panel consisting of persons not involved in the audit of the particular site being reviewed shall be convened to make conformity decisions. This would ordinarily be the FGM and at least one other person (not the auditor of record). The panel shall review the audit report and the evidence submitted, for each non-conformity, for every member site internal audit. The review panel alone shall have the authority to accept or reject the evidence and issue or renew a sites membership status. The FGM shall have the authority to request a follow-up audit in the event that the evidence is lacking or incomplete or if the time limit for submission is exceeded.
- 3.5.2 **Impartiality and Conflict of Interest** - There shall be policies in place (and properly documented) that address potential conflict of interest for all persons involved in auditing or decision-making regarding Farm/Hatchery member compliance or sanctions. This would include prohibiting an Internal Auditor or decision maker from being involved in the audit or decision process for a site that they own or work on or have assisted in compliance issues. Where such conflict of interest

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may exist, the auditor(s) or decision maker(s) shall remove him or herself from the audit and/or decision-making process.

3.6 Records of Internal Audits - All of the following records shall be maintained as part of the records of the Group by the FGM, and shall be readily available to the CB auditor during external audits and BAP upon request:


- 3.6.1 Internal Auditor list and qualifications;
- 3.6.2 Audit reports for each site, including auditor name;
- 3.6.3 Non-conformance records;
- 3.6.4 Corrective action evidence that was submitted to resolve the non-conformities;
- 3.6.5 Each decision to accept evidence and close the non-conformity, or request further evidence;
- 3.6.6 Each decision to sanction or suspend member Farms/Hatcheries;
- 3.6.7 The panel members involved in the decisions for each audit;
- 3.6.8 Where any panel member was temporarily replaced due to conflict of interest, a record describing the issue.

External Certification Body (CB) Audits and CB Procedures

4.0 External (CB) Annual Audits (CB Guidance)

4.1 General Requirements (CB Guidance)

- 4.1.1 To become certified, Applicants shall be able to demonstrate compliance with the elements described herein as well as the applicable GSA Farm/Hatchery Standard. Additionally, members shall comply with the rules imposed by the Group upon itself and its members. Compliance is verified through an independent third-party assessment by an accredited and BAP-approved Certification Body (CB).
- 4.1.2 The chosen CB will formulate a contract or written agreement between the Applicant and the CB detailing the requirements and commitments needed from the Applicant.
- 4.1.3 FGM and/or Internal Auditor Presence at the Member Facility Site Audits: The FGM shall accompany the CB during the member site audits. HOWEVER, neither the FGM, nor any of the Internal Auditors, shall answer auditor questions on behalf of the member site, or otherwise interfere with the audit and discussion with member site staff. (The FGM shall only answer auditor questions during the member site audit as they specifically relate to areas that the FGM is directly responsible for).
- 4.1.4 All Group sites named in the application shall be in operation at the time of both the initial and annual recertification, CB site audits. This means ongoing cultivation of the species named in the Group application. An exception for this may be considered for sites that engage in regular cycles of fallowing as part of cultivation; however, the number of fallow sites may never exceed 20% of the total number of Farms/Hatcheries in the Group at the time of audit.

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- 4.1.5 All Farms forming sub-groups/societies/cooperatives named in the application, treated as the unit of certification under Section 1.2.2.1, shall be in operation at the time of both the initial and annual recertification, CB site audits. An exception for this may be considered within such units of certification that engage in cycles of low/off-season production as part of cultivation; however, the number of such sites may never exceed 20% of the total number of units of certification in the sub-groups/societies/cooperatives at the time of audit.
- 4.1.6 The CB shall confirm during Phase I (remote desk top audit) that the Group has developed a QMS that includes all components listed in this document and has conducted the Group internal systems audit and all individual site internal audits. Copies of these records shall be sent to the CB and BAP upon request via email or suitable alternative digital record for review. The CB shall further confirm that all nonconformities the Group issued during these internal audits were closed to the satisfaction of the Group and in a manner consistent with the processes outlined in this document, by obtaining their non-conformance closure records with a description of the evidence accepted to close. The CB shall complete Phase I prior to proceeding with an on-site visit (Phase II and III).

4.2 External (CB) Audit – 5 Elements (CB Guidance)


- 4.2.1 The external audit will consist of five elements:
- Remote (off-site) desk audit of the QMS and related components as described below (Phase I)
 - On-site audit of FGM office (Phase II), starting with an opening meeting, prior to commencement of the audit
 - On-site facility assessments (Phase III), starting with an opening meeting prior to the commencement of the audit
 - Collection of any necessary samples
 - Closing meeting. The auditor will prepare a list of all non-conformities to be signed and left with the facility during the closing meeting.

4.3 External (CB) Audit (CB Guidance)– Audit Timing, and the Three Phases: The CB Group audit process consists of three phases. (Audit frequency annually).

The Certification Body shall be mindful that the audit consists of systems review and physical inspection of the sites and site practices. Time allocation during the audit shall provide sufficient and proportionate time for each activity to be carried out properly and fully. Where appropriate, additional time shall be allowed when the Auditor is required to carry out further investigation.

The audit phases and typical duration are described below. Note that the durations may increase or decrease, depending upon how efficient the Group is in its organization and ability to demonstrate compliance at each phase

As described previously, the success of the Group concept is dependent on the proper management, documentation and controls on the part of the Group and its members.

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4.3.1 Phase I: Audit of Certain QMS Components. There shall be an initial audit of the QMS system and documentary components prior to proceeding with the other phases. Documents to be reviewed by the auditor at Phase I are:

- the registry of member sites in accordance with 1.4.2
- the QMS manual in accordance with 2.4.1-2.4.4
- the internal audit reports (the QMS internal audit and each member site internal audit) in accordance with all of Sections 3.1-3.3.
- The non-conformities for each internal audit, and the corrective action evidence and actions taken by the Group to correct them in accordance with all of Sections 3.4 - 3.6.

(See 1.10. for translation requirements, where applicable).

Typically, this is one day audit. It shall be performed remotely by the CB auditor upon timely sending of all of these components electronically to the CB. This phase is also often called a “remote, or off-site, desk audit”. This portion is performed remotely for two reasons:

- A. To save time and cost for the applicant
- B. To avoid proceeding with Phase II and III and incurring time and travel costs where the applicant has clearly demonstrated at Phase I, they are not ready to proceed and are not in compliance with the Group Program or applicable GSA Farm/Hatchery Standard requirements. Where this is the case, the process will stop and/or the Group may be sanctioned or suspended at this phase. (See 4.7).


4.3.2 Phase II: Facility Group Manager (FGM) and Internal Systems Audit. There shall be an audit of the systems, management, and responsibilities of the overall Group, the FGM, and of the records and procedures of the member Farms/Hatcheries, on site at the FGM office.

Typically, this phase of the audit takes one-half to one day to complete. It is intended to cover the documents that were not reviewed at Phase I, and to review documents that should be maintained centrally where they and the procedures and records are common to all member sites. This phase also includes additional assessment of the FGM’s overall effectiveness in managing the Group program.

Notes: For effective management of the support documents that will be reviewed during Phase II of the external audit, applicants are strongly encouraged to maintain all relevant documents in an easily accessible fashion, at a central location, for efficient review.

Examples of other Group and QMS procedures and supporting documents to be maintained, typically checked at Phase II:

- Facility permits, licenses, and other legal documents
- Community correspondence
- Payroll information
- Personnel and Site training procedures and records
- Effluent testing records (if applicable)
- Sediment/benthic monitoring data (if applicable)
- Water usage records

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- Raw material purchases and their sources. (Such as stocking material, health certificates, etc.)
- Feed purchases, sources, FCR and FIFO calculations for Farms/Hatcheries
- Complaint and resolution files.
- Contracts or written agreements with member sites (for those that are not owned by the Group entity)
- FGM qualifications
- List of Internal Auditors and their qualifications
- Management review minutes, results and follow up actions
- Documentary Control Procedures
- Group entity decision-making committee members
- Wildlife Interaction Plans
- Health Management Plans
- Escape prevention procedures and incidence records
- Biosecurity procedures
- All internal audit reports and corrective action evidence in the event that further examination of these, after Phase I, is requested by the CB auditor.

4.3.3 Phase III: Member Site Audits: A select number (see 4.8 below) of member sites shall be audited at the initial audit phase, and thereafter annually for recertification. Member site audits are expected to take one-half to one day per site location.

Notes: The above time frames are only a guide. There may be cases where due to distances involved, a large number of facilities in the Group, or the complexity of the audits and systems, the number of days may be increased. Likewise, the number of days may be shortened in some cases, particularly if Farms/Hatcheries are very small and near to one another.


The time frames for site audits anticipate that many of the common elements and data will have already been reviewed at Phase I and Phase II. (For example, there are many records for each site that would be expected to be maintained at or in a database at the FGM's office. Such as effluent data, permits, feeding records, traceability records, etc.). Therefore, at the site level the auditor is typically focused only on practices or issues that are unique to that site, and on verification at site level that what was observed at Phase I and Phase II accurately reflects site practices and data.

4.4 Audit Reporting by the CB's Auditor (CB Guidance)

4.4.1 The external (CB) auditor shall use the authorized BAP Group and applicable Farm/Hatchery standard audit checklists for each of the three phases of the audit. The checklists that shall be used for every audit are:

4.4.2 The BAP Group audit checklist for the applicable Farm/Hatchery standard – Phase III

4.4.3 The BAP Group Program audit checklist. – Phases I and II, tallies at all 3 phases, and resulting additional non-conformities against the Group, where applicable.

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- 4.4.4 A written summary of the non-conformities shall be prepared by the auditor for all 3 phases at the completion of the audit during the closing meeting. This shall be provided to the management personnel of the Group, including the FGM (where the Group fails the audit at Phase I so that the other Phases do not proceed timely, the results of Phase I are to be provided promptly).
- 4.4.5 The auditor's summary of non-conformities for all phases shall be provided to the CB within 48 hours of completion of all phases. (Or sooner, after completion of each phase, at CB discretion).
- 4.4.6 A formal audit report shall be prepared and submitted to the CB within ten days of completion of all phases (or, sooner after completion of each phase at CB discretion).

4.5 Group-Related Non-conformities - and Added Citations Against the Group (CB Guidance)

- 4.5.1 Non-Conformities at Phases I (CB remote desk audit of the Groups QMS), and Phase II (CB audit of the FGM office) are defined as follows:

Group Critical – Where there is a critical systems failure on the part of the Group entity to properly implement requirements and to manage and control the Group and its members. Such systems failures indicate the Group's responsibility to ensure all sites conform to BAP requirements have not been met and conformity at all member sites cannot be relied on. (*Examples:* Required elements of the QMS have not been developed or implemented; sites have not been trained in the requirements of the GSA Standard or BAP Group Program; internal audits were not conducted at all listed Group member sites as required, etc.

Where a Group critical is raised, it shall be raised against either the "Group's QMS and Related Components" section of the audit, or the "Group's Internal Site Audits" section, as appropriate.


Group Major – Where there is a major breakdown or failure to comply with a clause of the Group Program Requirements in either the "Group's QMS and Related Components" section or in the "Group's Internal Site Audits" section. (*Examples* would involve deficiencies such as described under "Critical" above that do not rise to the level of critical but are significant enough to be major.)

Group Minor – As defined under "Major", but that do not rise to that level. Such as small oversights or technical errors in documents or records, or clause intentions being mostly met but not completely.

- 4.5.2 Raising an Additional Critical Against the Group:

Where there are 5 or more Major's raised against the Group during Phase I AND Phase II combined (10, or more, total), there shall be an additional non-conformity = critical = raised against the Group.

(Presence of too many majors indicates systems failures on the part of the Group related to either the QMS development and implementation, the Group's internal audits of the QMS, or both. Therefore, compliance of the Group and member sites cannot be relied upon).

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4.6 Site-Related Non-Conformities – And Added Citations Against the Group (CB Guidance)


4.6.1 Non-Conformities at Phase III (site audits) are defined as follows:

- **Site Critical** – Where there is a critical failure to comply with a legal, social accountability or food safety issue. Or, a critical failure to comply with one or more fundamental requirements of the applicable GSA Standard or BAP Group Program to the extent that it results in a risk to the integrity of the Scheme. This would also include situations where there is a fundamental breakdown in the site's programs and systems to the extent that there is a critical overall failure to comply with the applicable GSA Farm/Hatchery Standard or BAP Group Program requirements.
- **Site Major** - Where there is a substantial failure to meet the requirements of the intent of any clause of the applicable GSA Standard or BAP Group Program. But there is no Food Safety risk, issue of legality, fundamental systems failure, or immediate risk to the Integrity of the Scheme.
- **Site Minor** - Where absolute compliance to the clause or intent of the applicable GSA Farm/Hatchery Standard or Group Program requirements has not been demonstrated. Typically, minors would be technical deficiencies, small missing elements, small recordkeeping errors, or similar minor matters.

4.6.2 Site Critical, Major, and Minor Non-Conformities, and Additional Citations Against the Group:

4.6.2.1 Critical non-conformities found at member sites can either be “site specific” or “systemic”. Each classification has a different ramification in terms of resulting nonconformities assessed against the Group.

- **“Site Specific”** - confined to the site only and not indicative of a loss of control at the Group management level
- **“Systemic”** – Indicates a likely failure at the Group management level.

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4.6.2.2 Site level major and critical non-conformities shall be assessed against the site and Group as follows:

4.6.2.2.1 Excessive major non-conformities at multiple sites = Critical against the Group. “Excessive” is according to the following table:

Site Level Non-Conformities		
# of Sites in the Group	Minimum # of Sites for CB External Audit	# of Sites with 2 or More Majors = Added Critical Against the Group
6	3	2
7-12	4	2
13-20	5	2
21-30	6	3
31-42	7	3
43-50	8	4

4.6.2.2.2 One Site-Specific Critical issued at Phase III = additional Major nonconformity against the Group.

4.6.2.2.3 Two or More Site-Specific Critical non-conformities issued at Phase III = an additional Critical non-conformity against the Group.

4.6.2.2.4 Critical “Systemic” Site non-conformities issued at Phase III = additional Critical non-conformities against the Group.

4.6.2.3 Site level minor non-conformities shall be assessed against the Group as follows:

4.6.2.3.1 Excessive minor non-conformities at multiple sites = additional Major non-conformities against the Group. "Excessive" is according to the following table:

Site Level Non-Conformities		
# of Sites in the Group	Minimum # of Sites for CB External Audit	# of Sites with 2 or More Majors = Added Critical Against the Group
6	3	2
7-12	4	2
13-20	5	3
21-30	6	3
31-42	7	4
43-50	8	4

4.7 Certification, Corrective Actions, Sanctions, and Suspension (CB Guidance)

- 4.7.1 **Certification and Closure of Non-conformities:** All non-conformities raised during the audit (critical, major, and minor) shall be satisfactorily resolved before the CB can issue the BAP Certificate.
- 4.7.2 **Corrective Actions and Closure of Non-Conformities:** Proper closure of nonconformities is accomplished through the Group submitting sufficient objective evidence to the Certification Body that each non-conformity was properly resolved. Objective evidence shall be submitted, in English, via email or equivalent digital means to the CB and BAP upon request. Proper objective evidence includes records, revised documents or procedures, test results, pictures, etc. The evidence shall clearly show that the matter was corrected AND that the root cause was also properly identified and corrected to prevent future re-occurrence. (Root cause = why did it happen in the first place and how will it be prevented from happening again in the future?)
- 4.7.3 **Non-Conformities Raised Against the Group, Corrective Action Time Frames, and Sanctions and Suspensions -** The entire Group can be suspended at any of the three audit phase steps mentioned previously. (Where the applicant's obligations under Group program have not been met and/or significant deficiencies are found which risks the integrity of the BAP scheme). When an entire Group has been suspended, the Group must immediately instruct its members that none of the product remaining in the member facilities is to be considered BAP certified and to STOP claiming BAP certification for any crops they are producing.

4.7.3.1 **Audit Phase I** - CB remote desk audit of components of the Group's QMS

4.7.3.1.1 Initial Group Certification (New Applicant)


- **Critical** – 1 or more Critical non-conformities shall result in halting the audit process. Phase II and III will not proceed until the non-conformities are corrected to the satisfaction of the CB
- **Major** – 7 or more Major non-conformities at Phase I shall result in halting the audit process as described above.
- **Less Than 7 Major non-conformities** - shall be corrected within 28 calendar days after the entire audit process (all 3 phases) is completed. The CB shall notify the Group regarding the 28 day deadline
- **Minor** – All Minor non-conformities shall be corrected within 28 calendar days after the entire audit process (all 3 phases) is completed. The CB shall notify the Group regarding the 28 day deadline

4.7.3.1.2 Recertification Group Audits

- **Critical** – 1 or more Critical non-conformities shall result in the immediate suspension of the entire Group. Phase II and III will not proceed until the non-conformities are corrected to the satisfaction of the CB. The CB shall notify BAP Management immediately that the Group has been suspended so the BAP can remove the Group from the website until the matter(s) is resolved.
- **Major** – 7 or more Major non-conformities at Phase I shall result in suspension as described above.
- **Less Than 7 Major non-conformities** - shall be corrected within 28 calendar days after the entire audit process (all 3 phases) is completed.
- The CB shall notify the Group regarding the 28 day deadline
- **Minor** – All Minor non-conformities shall be corrected within 28 calendar days after the entire audit process (all 3 phases) is completed. The CB shall notify the Group regarding the 28 day deadline.

4.7.3.2 **Audit Phase II** – FGM office audit of remaining QMS components and applicable GSA Farm/Hatchery Standard records, documents, test results, etc. common to the Group sites (as previously described).

- ##### 4.7.3.2.1 Initial Group Certification (New Applicant) – Phase II and Phase III shall proceed and be properly completed regardless of the number or nature of non-conformities assessed. The nonconformities shall all be satisfactorily closed prior to the applicant being issued certification. Where the number and nature of the nonconformities is too excessive to provide confidence that the facility understands and is able to comply with the BAP requirements, a re-audit will be required prior to initial certification.

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4.7.3.2.2 **Recertification Group Audits** – Phase II and Phase III shall proceed as described above under “initial certification” regardless of the outcome at Phase II. A re-audit may also be required as stated above. Corrective actions and/or suspension procedures shall apply as described under Phase I – section 4.7.3.1.2 above.


4.7.4 **Non-Conformities Raised at the Member Sites (Audit Phase III), Corrective Action Time Frames, and Sanctions and Suspensions** – At the site level audits (audit Phase III), corrective action and/or sanctions and suspensions shall proceed as follows:

4.7.4.1 Non-conformities at the site level that result in additional non-conformities raised against the Group (see 4.6.2) shall be addressed at the Group level as described under section 4.7.3 above.

4.7.4.2 Non-conformities at the site level, WHETHER OR NOT they result in additional non-conformities raised against the Group, shall be handled at the site level as follows. The CB shall confirm the Group has taken the required steps or suspend the Group.

- **Critical** – The Group entity shall immediately suspend the member site from the Group. The Group shall follow the corrective action process and procedures described in 3.4. and 3.5. EXCEPT that time frames are different:
 - For Initial Certification (New Applicant Groups): the Group shall not be certified until either all member site non-conformities are closed to the satisfaction of the CB, or, the Group undertakes to remove the site from the Group where that site’s issues are holding up the certification of the entire Group.
 - For Recertifying Groups: The CB shall notify BAP as previously described, the name of the site that has been suspended in order that it can be removed from the BAP website. Corrective actions for the site shall be taken to the satisfaction of the CB BEFORE the Group’s certificate has expired. Where this does not happen in time, the Group shall notify the CB and BAP that the member site has been removed from the Group in order to proceed with recertification for the remaining Group members. If the Group does not undertake this action, the CB shall notify BAP of this and the need to suspend the Group.
- **Major and Minor** – Shall be properly addressed to the satisfaction of the CB prior to certification for new applicant Groups (initial cert). For recertifying Groups, all non-conformities shall either be corrected to the CBs satisfaction PRIOR to the recertification date of the Group.

OR, the Group shall undertake to suspend or remove the site(s) that have not corrected the non-conformities in time. The Group shall notify the CB of such action, and the details of the sites suspended or removed. The CB shall inform BAP management of the sites to be removed from their certificate and from the BAP website. Should the Group NOT undertake to suspend or remove member sites that have not closed minor or major nonconformities on time, the CB shall notify BAP of this and the need to suspend the Group.

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4.8 Number of Site Audits, Site Selection, and Advance Notice for CB External Audit: (CB Guidance)

4.8.1 Scope – the site audits shall be conducted by the CB auditor against the entire scope of the BAP Group Program and the applicable GSA Farm/Hatchery Standard

4.8.2 Minimum number of Sites – the minimum number of sites selected by the CB shall be the square root of the number of sites in the Group, rounded (up or down), to the nearest whole number, plus one. In cases where BAP has agreed to allow simultaneous certification of Groups as described in 1.6.1, a sum shall be made of the total number of individual Farm/Hatchery member sites. The minimum number of sites to be selected for Phase III audits from the total shall be the square root rounded up or down to the nearest whole number, plus one. Special attention must be given to ensure that a proportional number of each facility type shall be selected for Phase III site audits, considering the total number of each type of facility. The objective of this proportional representation is to ensure that over a 5 year period, 100% of all individual member sites are subjected to a Phase III external CB audit. However, not less than 1 site of each facility type must be audited during each annual certification audit.

Example 1 (rounding up): A Group has 15 sites (Farms or Hatcheries)

The square root of 15 = 3.87

Rounding up = 4

4 + 1 = 5

Example 2 (rounding down): A Group has 30 sites (Farms or Hatcheries)

The square root of 30 = 5.48

Rounding down = 5

5 + 1 = 6

Example 3 (rounding down): During simultaneous audits of multiple Groups, in which there is a Farm Group of 24 sites and a Hatchery Group of 6 sites,

The sum of 24 and 6 is 30 and the square root of 30 = 5.47

Rounding down = 5

5 + 1 = 6

In this example, with regards to a “proportional” selection of sites of each type, the auditor should select 5 farms and 1 hatcheries to audit.


Example 4 (rounding up): During simultaneous audits of multiple Groups, in which there is a Farm Group of 30 sites and a Hatchery Group of 15 sites (this could also be composed of one Farm Group in one part of a country and a second Farm

Group in a different part of the same country),

The sum of 30 and 15 is 45 and the square root of 45 = 6.71

Rounding up = 7

7 + 1 = 8

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In this example, with regards to a “proportional” selection of sites of each type, the auditor should select 5 farms and 3 hatcheries to audit.

Site Selection	
# of Sites in the Group	Minimum # of Sites for CB External Audit Selection
6	3
7-12	4
13-20	5
21-30	6
31-42	7
43-50	8

4.8.3 Site Selection

- The sites shall be selected at the CBs discretion, based on risk and other factors.

Other factors may include logistical concentration, size or production volume of the sites, or similar considerations.

Risk factors that would indicate the need to select a particular site for auditing include: deficiencies found during the Phase I or Phase II audits; results of the Group’s internal audits; inclusion of sites that have not been externally audited in the past; the inclusion of sites added since the last audit; the inclusion of one or more outlier sites (where distance from the rest may indicate challenges in proper oversight by the Group). Other factors not listed here as determined by the CB would also be part of the consideration.

- Due to the risk factors described above that shall go into site selection determination, the final sites selected shall NOT be determined by the CB until AFTER Phase I of the audit has been completed.

4.8.4 Increasing the Number of Sites Beyond the Minimum.

The number of sites selected for the CB audit shall be increased, due to higher risk, as follows:

Risk Factors - Each Applicable Factor = Increase # of Sites Selected by CB by a Minimum of 1

1 or more critical non-conformities were raised against 1 or more sites at the last external CB audit
4 or more major non-conformities were cited against the Group entity at the last external CB audit
The Group has been suspended, for any period of time within the last 12 months.
1 or more critical, or 4 or more major non-conformities found during the current Phase I or Phase II of the audit (against the Group's control systems).
1 or more critical, or 4 or more major non-conformities, found during the current CB auditor's individual site (Phase III) audit that indicates a potential system-wide failure. CB's shall have the discretion in such cases to add more sites to be sampled during Phase III of the audit process than were initially selected.
Other serious risk factors at the CBs discretion.

4.8.5 Selection and Risk Reporting - The CB shall ensure that the sample selection criteria used, including increasing for risk factors, is properly explained in the final audit report.

4.8.6 Site Selection Notice to the Group – the CB shall not inform the Group of the specific sites selected for Phase III of the audit process more than 10 business days prior to their commencement.

5.0 Rules for Initial Certification, and Annual Certification Renewal (CB Guidance)

5.1 Certification Requirements:

5.1.1 Initial Group Certification:


5.1.1.1 For initial Group BAP certification, the Group shall have completed the items listed in the bullet points below, prior to applying to BAP, or at least prior to the application being sent to the BAP CBs for audit scheduling. These items shall be implemented/completed by the Group in sufficient time prior to the application and audit scheduling to ensure that all elements required by the Group Program and applicable GSA Farm/Hatchery Standard are in compliance.

- Developed and implemented the QMS at all sites
- Have a complete registry of sites
- Shall have conducted an initial internal audit of all member sites

- Shall have all non-conformities identified at each member site, and the corrective actions taken for each with root cause analysis, available for review by the CB and BAP upon request
- 5.1.1.2 All Group sites named in the application shall be in operation at the time of the initial CB site audits. For Farms/Hatcheries this means ongoing cultivation of the species named in the Group application. An exception for this may be considered for sites such as farms that engage in regular cycles of fallowing as part of cultivation, biosecurity measures, or environmental regulatory requirements; however, the number of fallow sites may never exceed 20% of the total number of Farms/Hatcheries in the Group at the time of audit.
- 5.1.1.3 All Farms forming sub-groups/societies/cooperatives named in the application, treated as the unit of certification under Section 1.2.2.1, shall be in operation at the time of the initial CB site audits. An exception for this may be considered for units of certification that engage in cycles of low/off season production as part of cultivation, biosecurity measures, or environmental regulatory requirements; however, the number of such sites may never exceed 20% of the total number of units of certification in the sub- groups/societies/cooperatives at the time of audit.
- 5.1.1.4 All non-conformities cited in the Group initial internal audit shall have been closed and the evidence for their closure shall be available for the CB external audit.
- 5.1.1.5 All agreements and applications shall have been signed and all fees paid before the audit can be conducted. The Group shall not be certified by the CB or uploaded to the BAP website until all steps are satisfactorily completed.

5.2 Annual Group Certification Renewal (CB Guidance)

- 5.2.1 To recertify, four months prior to the renewal date posted on the BAP website, the BAP office will send the Group entity a new Facility Certification Agreement, the relevant Update Form and any other steps and requirements. If there are no changes in membership of the member sites in the Group, the Group entity shall complete all of the information and steps sent by BAP no later than two months prior to the recertification date. Any requests concerning changes in the membership composition of the Group shall be made by the Group entity at the time of re-application. Such requests shall be received no later than three months prior to the recertification date so that a revised application packet may be prepared. The updated Group Registry of Sites shall be sent at the time of application.
- 5.2.2 During the recertification application process described above, the Applicant shall ensure that the QMS is up-to-date, all required internal audits have been completed, all non-conformities were resolved, and the management review was conducted as outlined in this document, so that the Group is in compliance with the BAP Group Program and applicable GSA Farm/Hatchery Standard. The Group shall attest to these having been completed and the Group is in compliance at the time of the recertification application.
- 5.2.3 Where the Group is not ready for recertification and cannot attest to compliance as noted in 5.2.2, the Group shall so state, and shall inform BAP when they will be ready. If they will not be ready in time for the CB to complete the audit process within the required time frame, the Group will be suspended. If the Group attests to compliance, and the CB finds during Phase I that they are not, such that there are 1 or more critical non-conformities as previously outlined, the Group will be suspended.

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- 5.2.4 All Group sites named in the application shall be in operation at the time of the annual CB site audits. For Farms/Hatcheries this means ongoing cultivation of the species named in the Group application. An exception for this may be considered for sites that engage in regular cycles of fallowing as part of cultivation; however, the number of fallow sites may never exceed 20% of the total number of Farms/Hatcheries in the Group at the time of audit.
- 5.2.5 All Farms forming sub-groups/societies/cooperatives named in the application, treated as the unit of certification under Section 1.2.2.1, shall be in operation at the time of the annual CB site audits. An exception for this may be considered within such units of certification that engage in cycles of low/off season production as part of cultivation, biosecurity measures, or environmental regulatory requirements; however, the number of such sites may never exceed 20% of the total number of units of certification in the sub-groups/societies/cooperatives at the time of audit.
- 5.2.6 BAP reserves the right to send or appoint an auditor to conduct unannounced/limited notice audits of both the QMS and of individual member sites at its discretion. The scope of the unannounced/limited notice audits will be at the discretion of the BAP. Any non-conformities raised during an unannounced/limited notice audit shall be closed as per standard BAP rules or the Group risks suspension of its certification.

Appendix 1.0 - Group Certification Process Overview for Initial BAP Group Certification

1. Group Formation:

- Establish Group entity
- Develop Group Site registry for all member sites: Site names, owners, area, GPS coordinates, etc.

2. Develop QMS:

- Name Facility Group Manager (FGM)
- Name Group Internal Auditors
- Establish Internal Audit Schedule
- Develop Organization Chart
- Develop Quality Manual
- Develop Documentary Control and Recordkeeping

3. Internal Audits:


- Begin Internal Audit of member facilities
- Issue non-conformities (NCs) where appropriate and follow NC resolution/Corrective Action process.
- Develop and maintain record-keeping procedures for all internal audits and NC resolution.
- All internal NCs must be resolved before external audit process can begin.

4. External (CB) Audits:

- The CB can begin to schedule the audit after the QMS has been properly implemented for a sufficient amount of time to ensure compliance, and all member sites have had the required internal audit, and have identified and corrected NC's.
- Follow BAP Group application procedure.
- CB will determine which member sites will be selected for initial audits.

5. BAP Certification:

- All non-conformities cited during CB audits must be resolved in the time frames specified.
- All fees must be paid.
- CB issues certification, naming Group and listing all sites
- BAP lists Group and member sites on BAP website

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Appendix 2.0 - Requirements for BAP Salmonid Marine Cage Farm Group Surveillance Audits

(To be used only during surveillance audits - **Not Applicable** during normal full Salmonid Marine Cage Farm Group audits. This section and audit approach is not applicable to any other BAP-eligible species.)

A2.0 Salmonid Marine Cage Farm Group Surveillance Audits

- A Surveillance Audit is defined as an interim, external BAP Audit conducted by an approved auditor assigned by a third-party Certification Body (CB).
- BAP will allow Surveillance Audits to be conducted on Salmonid Marine Cage Farms certified under the BAP Farm Group Program, provided that the conditions described in this Appendix are satisfied.
- For the sake of Salmonid Marine Cage Farm Groups, BAP defines an **active** site as a farm having fish stocked in cages, and in an active operating mode. Sites that remain **inactive** for more than three years must be removed from the Group Registry until such time as there is a decision taken to bring the site back into production.

A2.0 1 Surveillance Audit Scheduling & Auditor Assignments

- For salmon farms certifying under the BAP Farm Group Program, BAP has allowed a **2-year validity** on the salmon farm certificates, provided that the Salmon Farm Group successfully passes an interim surveillance audit near the 1-year anniversary date following the last successful full Farm Group audit.
- Such surveillance audits shall preferably be performed by the same auditor that did the initial Group audit to maintain continuity of the process. Any exceptions to this rule must be approved by BAP in writing.


A2.0 2 Remote Audit of Group Phase I Components

A2.0 1.1 Phase 1: An external (CB) remote desk-top review of the Group's annual internal audits of all qualified member sites and of the Group's Quality Management System (QMS) shall be performed as described in the Phase I portion of the BAP Farm and Hatchery Group Program.

A2.0 1.1.1 The auditor shall confirm that **all** member sites that meet any 2 out of 3 of the following site qualifications have had an internal audit (as described in Sections 3.3-3.6 of the Farm and Hatchery Group Program) accomplished not more than 365* days prior to the surveillance audit:

- The site has fish in the water at the time of the surveillance audit;
- The site has harvested or transferred out the last of its fish not more than 30 days prior to the surveillance audit;
- The site was most recently stocked more than 60 days prior to the surveillance audit.

** Timing of the internal audits shall ensure that all required internal audits, as defined by the above criteria, are conducted and completed, with all non-conformities resolved and a site's membership status confirmed prior to the surveillance audit. The internal audits, corrective action evidences, and records of*

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the Review Panel conformity decisions shall be available to the CB Auditor for remote auditing, and upon request to BAP.

A2.0 3 Phase II Surveillance Audit

- Phase II Surveillance Audits are to be conducted remotely between the external (CB) auditor, Facility Group Manager (FGM) and other key Group personnel, provided that the CB has determined that onsite Phase II or Phase III Audits are not required per A1.1 4 – A1.1 7.
- The Phase II external (CB) audit is a review of all pertinent documents not covered in Phase I, through a **remote** interview process that allows for online sharing of documents.
- The Auditor shall focus on interviews of the management personnel, on the performance of the internal audits, corrective actions, timely responses from the site crews, and other key performance parameters to evaluate the continued performance of the Group, including a review of non-conformities identified during the previous external Group audit.

A2.0 4 Changes in Farm Group Site Membership Occurring Prior to Surveillance Audits

- A2.0 4.1 To determine whether any onsite Phase II and III audits are warranted as part of a Surveillance Audit, the following evaluation must be made: if at the time of application for a Surveillance Audit the Group Registry of Sites has been **changed** relative to the registry communicated to the CB and to BAP during the last full Group audit, such that when the total change is summed (i.e. the sum of **both** additions and subtractions) and added to the original number of sites, then the square root (+1) shall be calculated and the previous audit's square root (+1) subtracted from it. (See below for an illustration of this calculation.) **If the end result of this calculation rounded up or down to the nearest whole integer is greater than 0 this will result in a requirement to carry out onsite Phase II and III audits, with the minimum number of Phase III site audits equal to the result.**

Formula for determination of the number of surveillance audits to perform:

N1 = original number of **active** sites in previous group certification


$SQRT1 = \sqrt{N1}$ *rounded up or down to the nearest whole integer*

N2 = (# of sites added) + (# sites removed)

$SQRT2 = \sqrt{N1 + N2}$ *rounded up or down to the nearest whole integer*

Number of Phase III audits = (SQRT2 + 1) – (SQRT1 + 1)

Which can also be expressed simply as = SQRT2 - SQRT1

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Example 1: 25 sites were initially certified, 10 sites were added and 5 were removed.
 $N1 = 25$; $SQRT1 = \sqrt{25} = 5$; $N2 = 10 + 5 = 15$; $SQRT2 = \sqrt{25 + 15} = 6$

In this example, the number of onsite Phase III audits would = $SQRT2 - SQRT1 = 6 - 5$ **i.e. = 1**

Example 2: 25 sites were initially certified, and 5 sites were added and none were removed.

$N1 = 25$; $SQRT1 = \sqrt{25} = 5$; $N2 = 5 + 0 = 5$; $SQRT2 = \sqrt{25 + 5} = 5$

In this example, the number of onsite Phase III audits would = $SQRT2 - SQRT1 = 5 - 5$ **i.e. = 0**

- BAP must be advised of any such member site additions at the time the Group applies for recertification and concerning any removals at the time the farms are actually removed.
- Sites chosen for Phase III surveillance audits (if any) are to be selected by the auditor from among all the “**active**” sites in the updated Group Registry. Farms selected for Phase III audits must be stocked and in operation at the time of the audit inspection.
- Fallow sites, assuming the Group has definitive plans to re-stock the sites, are to remain and be counted as “**inactive**” members of the Group and will not count as a “change” for the calculation of the square root formula for Surveillance Audits. Since Fallowing of leases is an integral part of production planning for environmental as well as biosecurity reasons for many regions, BAP will accept in Groups composed of Marine Salmonid Cage Farms, up to 40% Fallow sites at the time of audit. (As compared to the 20% limit otherwise normally imposed in the BAP Group Program.

A2.0 5 Review of the Salmon Farm Group production schedule by the external (CB) auditor


A2.0 5.1 Updated production schedule projections for the Group member sites shall be supplied to the auditor along with the internal audits. Copies of these projections shall also be submitted to the BAP.

A2.0 6 Determination of need for possible onsite Phase II and Phase III audits through risk assessment of the Group’s performance since the initial onsite external (CB) Group audit

- Based on results of Phase I and II remote audits, the auditor will determine if there exists a significant risk that the Group internal management is not performing effectively, and whether adherence to the BAP Farm/Hatchery Group Program and/or the Salmon Farm Standard is at risk. Possible risk factors to consider are described in the Farm/Hatchery Group Program Document section 4.8.4.
- If risk factors are identified and a decision is reached to **proceed to onsite Phase II and III audits**, prior to scheduling such audits, the CB must contact BAP and provide justification for any decision to move to onsite audits.
- **Such an outcome would trigger additional BAP invoicing since initial invoicing for Salmon Farm Group Surveillance audits assumes that no onsite auditing will be needed.**

A2.0 7 Supplementary Onsite Phase II and III Audits

- In cases where it is determined that Phase II and III Site audits must be performed to confirm Group conformance, the auditor shall select a number of sites to be audited based on applicable risk factors as outlined in the Farm/Hatchery Group Program

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document section 4.8.4 (i.e., the number of sites on which to perform Phase III audits is to be determined by using the normal SQRT +1 formula, plus adding additional sites beyond this minimum, NOT just a minimal number of surveillance site audits as described in Section 3 of this Appendix. When significant risk factors have been identified, a full audit, including a full set of onsite Phase II and Phase III Site audits, must be performed).

A2.0 8 Surveillance Audit Scenarios

Scenario 1 (Successful Audit Conclusion)

- All requirements **have been met** (and any Non-Conformities have been resolved within the specified time frames). The audit result demonstrates to both the auditor and the Certification Body that continuous compliance to the BAP Group Program and Salmon Farm Standard is being maintained. No onsite Phase II or Phase III audits were required.
- Annual program fees must be paid so the 2-year certificate is maintained.
- The original BAP Validation Letter, Certification Body's certificate and BAP website listing may have to be amended to reflect any additions/removals to the Group since initial certification.
- After successful completion of the Surveillance audit, the BAP Group Certificate shall be amended to reflect the updated site registry of the Group.

Scenario 2 (Unsuccessful Audit Conclusion)

- All requirements have **not been met**.
The audit result demonstrates to both the auditor and Certification Body that continuous compliance to the BAP Farm and Hatchery Group Program and the Salmon Farm Standard is **not being maintained**.
- Failure to close any Identified non-conformities against the Group in the specified time frames to the satisfaction of the Certification Body could lead to suspension of Group certificate. Suspension may be lifted following a complete re-audit of the Group.


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Figure 1 – Decision Tree for Salmon Marine Farm Surveillance Audits

