

Requirements for Certification Bodies Offering Certification Against the Criteria of the Global Seafood Alliance Best Aquaculture Practices Standards

Issue 14.12

20-November-2024

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1.0 Standards Background and Program Overview

1.1 The Global Seafood Alliance (GSA) (Standards Owners)

The Global Seafood Alliance (GSA) is an international, non-profit trade association. The corporation is registered in Delaware, USA with principle offices based in Portsmouth, New Hampshire. It is dedicated to advancing environmentally and socially responsible aquaculture. The Alliance was founded in 1997 with 59 members in the Americas, Europe, and Asia. It now comprises over 3000+ members in 55 countries and has become the most prominent industry organization representing the global aquaculture business (www.globalseafood.org).

Through the development of the Best Aquaculture Practices (BAP) program, GSA has become the leading standards – setting organization for farmed seafood.

1.2 Best Aquaculture Practices – Program Manager

BAP is a division of the GSA, with headquarters office located in Portsmouth, New Hampshire, USA. BAP manages the GSA Program on behalf of the GSA.

1.3 Objective of the GSA Standards

The objectives of the GSA standards for farms, hatcheries, feed mills and processing plants is to specify food safety, quality, environmental and social responsibility, verification testing and traceability criteria required to be in place within the type of operation each standard applies to. The Seafood Processing Plant Standard's food safety component is Global Food Safety Initiative (GFSI) recognized. The format and content of each Standard are designed to allow an assessment of a company's premises and operational systems and procedures by a competent third-party ISO/IEC 17065 accredited Certification Body against the requirements of that individual Standard.


To ensure the integrity of the GSA Standards and the associated certification it was imperative for BAP to establish structures with defined responsibilities, procedures, and terms of reference.

As changes are made to this document, the Certification Bodies will be given 30 days to make necessary changes and adaptations. The time allocated to CBs in developing countries will be 60 days and with due consideration to capacity building by the BAP Management.

1.4 Standards Development and Ownership

The GSA Standards have been developed by the GSA Standards Technical Committees. Since January 2008, the GSA Standards Oversight Committee has overseen the standards development process and committee selection process. The Standards Oversight Committee membership is drawn from representatives of Industry, NGO's and Academia. The BAP Technical Committees manage the continued operational issues in relation to Standards. Each committee has their own Terms of Reference under which they conduct business.

The Standards remain the property of the Global Seafood Alliance.

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1.5 BAP Program Management

Once Standards are approved, the administration of the BAP Program rests with the Best Aquaculture Practices who act as Program Managers for the GSA. Best Aquaculture Practices approves and contracts Certification Bodies (CB) to carry out certification of the Applicants to the Program Standards. CBs are categorized as either Restricted Approved or fully Approved (See 3.3).

Best Aquaculture Practices is responsible for the official training of auditors and maintains a list of approved auditors from all CBs for the GSA Standards.

Best Aquaculture Practices conducts regular reviews of the operation of the scheme to protect program integrity and ensure compliance with the requirements of global standards including, as applicable, examples such as ISO/IEC 17065, ISO 17011, GFSI, etc. These reviews are conducted in multiple ways including internal audits, CB and auditor performance monitoring, consult with the GSA and SOC in Standards review and revision, and so forth.

1.6 Certification and Audit Scope

Certification of applicants wishing to be assessed against the GSA Standards is carried out by approved CBs. CBs assess the Applicant's facility and determine if the said facility meets all the requirements of the applicable Certification Standard.

The certification and audit scope of a facility for SPS audits would be 'Processing of Perishable Animal Products' which is per GFSI CI scope of industry sector as SPS is benchmarked to CI scope. This is the food safety pillar of the GSA-BAP Program. In addition, SPS has requirements from other pillars of the GSA-BAP Program – social, environmental, and animal welfare. These would also be audited within the scope selected.

Within the certification scope, the GSA Standards do not allow for exclusions in conducting audits of any facilities against any of the standards. All facilities seeking certification against any of the GSA Standards, and CBs performing assessments, must conduct a full audit against all parts of the facility and eligible species and product forms that the facility produces. All applicable requirements of the standards must be audited as well.

The Seafood Processing Standard (SPS) does allow for a selection of scope for certification to farm raised product, wild caught, or both (see section 4.5); however, if a seafood processing facility is processing both and has opted for only one category (e.g. farm raised) as their scope of certification, they cannot restrict the auditor to enter the frozen storage for the other category (e.g. wild caught). The facility must allow access to such frozen storage areas, and it is for the auditor to determine whether the storage units can be excluded from the audit upon verification that the facility has stored only products from wild caught species and may in fact be excluded from the audit and certification.

The CBs who wish to gain approval to audit against the GSA Standards must fully understand their responsibility and role to provide assurances that required Standards are monitored and maintained.

These Terms of Reference will include CB performance review and, where necessary, Best Aquaculture Practices will draw to the attention of the CB and their Accreditation Body any matters requiring investigation or action.


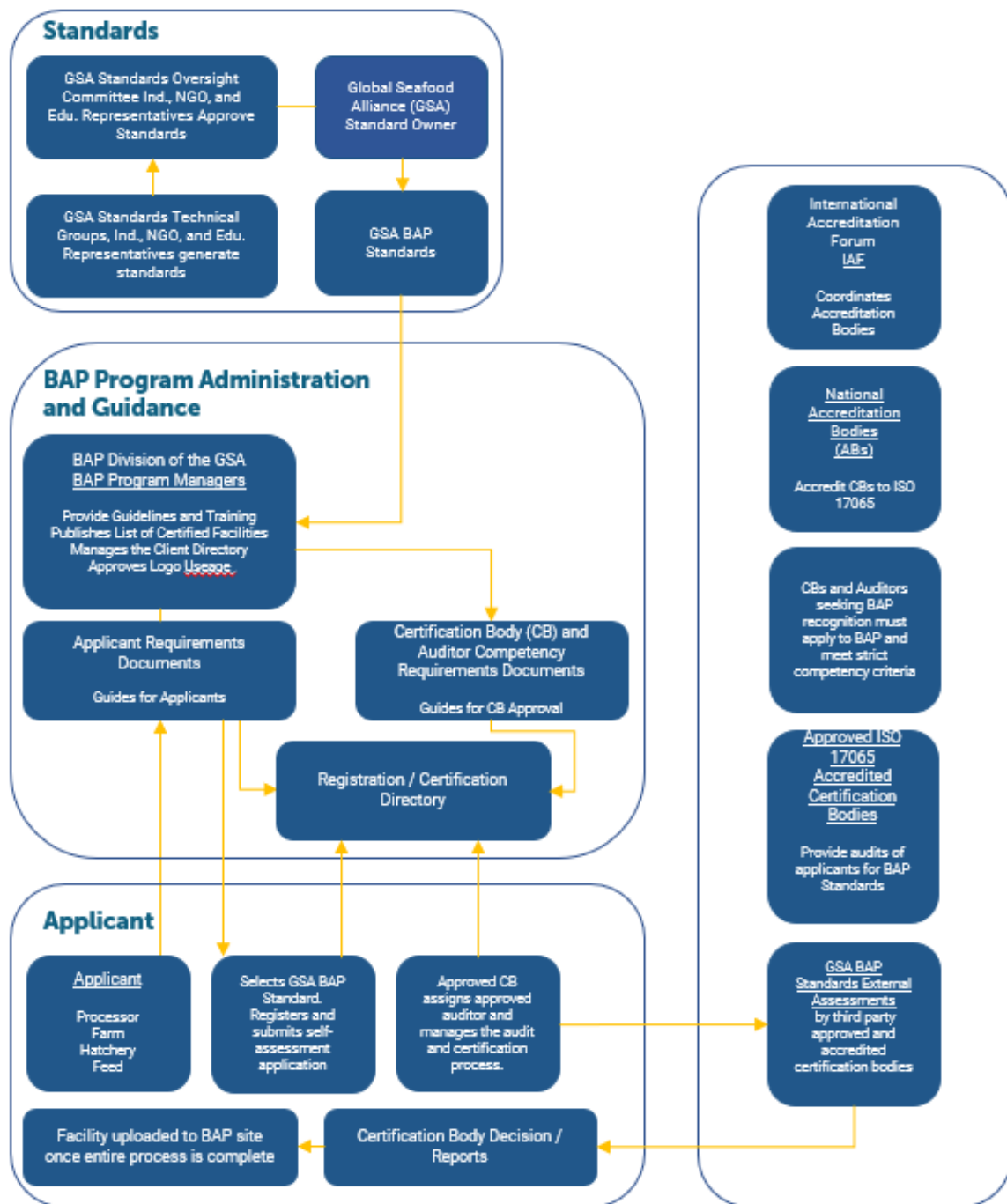
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Diagram 1 – Summary of the Structures Associated with the Certification Program



2.0 Standards Background and Program Overview

2.1 Purpose

This document has been prepared by the BAP division of the GSA, the designated BAP Program Managers.

The purpose of the document is to ensure that CBs and Accreditation Bodies are fully aware of:

- The role of the Best Aquaculture Practices
- The importance of the GSA Standards
- Their responsibility with respect to legal liability
- The procedures supporting the GSA Standards and the obligation to comply with all requirements toward protection of the integrity of the scheme.

Significant efforts have been made to promote openness and transparency in the development and implementation process and to work closely with all stakeholders to ensure the integrity and robustness of the system.

It is of the utmost importance that those involved with certification and accreditation are included in the continued development and implementation of the GSA Standards. This document will assist with the understanding of the aims of the GSA Standards and their significance.

2.2 Update to Standards, Protocols and Procedures

Best Aquaculture Practices will periodically issue new or revised requirements to this document, the GSA Standards, and/or the various other documents supporting the Standards. Best Aquaculture Practices shall make the CBs aware of these changes and the CB shall ensure these are communicated to applicants and the appropriate staff, auditors, and subcontract auditors within their organization. The latest Issue of each Standard will be on the BAP website.

Standards will be identified by an Issue Number. When minor changes (housekeeping) are made to a Standard this may result in a subsequent Revision Number e.g., Issue 1 Rev. 1. CBs are expected to be accredited to the most recent Issue Number.


When a significant change is made to a Standard the Issue Number will change. Applicants and CBs will be given adequate time to make necessary changes and adaptations.

2.3 Communications

With Certification Bodies: See 3.4.2.

With Applicants and Certified Sites: Best Aquaculture Practices may contact applicants or certified sites in order to request feedback with regard to the audit and certification process as part of the CB performance monitoring.

With Accreditation Bodies: Best Aquaculture Practices will expect to have open channels of communication with Accreditation Bodies and may share some data with Accreditation Bodies responsible for the accreditation of Best Aquaculture Practices approved CBs. CBs will be expected to facilitate open communication channels with Accreditation Bodies. This may include such items as complaints submitted to Best Aquaculture Practices that are considered to be

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justified, or information resulting in suspension or withdrawal of CB approval by Best Aquaculture Practices. Accreditation

Bodies are also required to share information with Best Aquaculture Practices related to CB Compliance and / or notifications of suspension or withdrawal of a CB's accreditation.

3.0 Certification Body (CB) Requirements

3.1 CB Recognition by Best Aquaculture Practices

Certification Bodies wishing to apply for approval and recognition to audit against one or more of the GSA standards must first, as a pre-requisite, be accredited to the current version of the ISO/IEC 17065 standard with an Accreditation Body per 3.3.1 BEFORE applying to GSA. CBs must also be a recognized Member Firm with the Association of Professional Social Compliance Auditors (APSCA). Only independent third-party Certification Bodies not associated with government regulatory bodies will be accepted as CBs to audit conformity of facilities against the GSA standards. CBs wishing to seek recognition must formally request Best Aquaculture Practices confirming their intention and submit a registration form. The CBs shall state which of the Standards they are requesting approval for. If the registration meets the BAP Requirements, the CB will be sent additional materials to initiate the application process.

Certification Bodies will be given "Restricted Approval" status for each Standard until they achieve full accreditation status for each specific Standard Issue. During this time the CB will be given a restricted number of audits to allow them to gain accreditation.

Note: In addition, once a CB has been approved by BAP, that CB must also seek an extension to scope of their ISO/IEC 17065 accreditation to include the GSA Seafood Processing Standard and other relevant GSA Standard(s). The CB will remain on a Restricted CB Approval List for each Standard until the CB has become accredited for that Standard scope. Once accreditation has been achieved the CB will move to a "Fully Approved" listing. See 3.3 and 3.4 for more details.


CB Applicants must meet all requirements of this and other relevant BAP documents, including but not limited to the competency and training requirements of Certification Body personnel and individual Auditors related to the specific seafood categories covered under GSA.

Only Certification Bodies that are registered and formally recognized by Best Aquaculture Practices are authorized to conduct audits against any of the GSA Standards. Any and all offices that offer and make certification decisions, and/or issue certification to GSA Standards shall be duly registered with Best Aquaculture Practices.

Approval of a Certification Body will only take place if their Accreditation Body is recognized by Best Aquaculture Practices. See 3.3.

The CB will have a named representative responsible for dealing with all aspects of GSA Standards, Certification and Accreditation and these persons shall be named on the registration form. In the event that a named representative leaves the employment of the CB, Best Aquaculture Practices shall be informed accordingly and provided with the name and details of the replacement.

Best Aquaculture Practices recognizes the importance of accreditation and during the development of all the Standards and Certification Process it has consulted with (IAF) national accreditation bodies and experienced CBs to ensure that all the requirements of product/process certification are met.

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3.1.1 BAP Office Audits

During the initial application process, all CBs are subject to and required to participate in a BAP office audit of the CBs critical office(s) from where the CB will manage the BAP Program. BAP will conduct an office audit on the CB, at a minimum, once every 3 years, thereafter. The CB may be subject to more frequent office audits by BAP as determined by risk. The CBs will be subject to the same KPIs set by BAP for conducting facility audits.

Task	KPI
BAP will send the CB the NC Summary	No more than 10 calendar days from the date of the audit completion
BAP is to receive all Corrective Actions from the CB	No more than 35 calendar days from the date of the audit completion
BAP is to close out the NCs	No more than 7 calendar days from the date the Corrective Action was submitted
BAP is to send the final audit report to the CB	No more than 60 calendar days from the date of the audit completion

3.1.2 CB Quality Management System

The CBs will provide evidence to show that it has a fully documented and implemented Quality Management System, under the responsibility of a designated individual within a defined management structure, such that regular system reviews are conducted to ensure the continuous improvement in the quality of the CB services provided.

- The CB Quality Management System must be documented in a quality manual and associated quality procedures, made available to all staff, implemented, maintained, and continually improved.
- The CB must have an appropriate Quality Manual that must include a Quality Policy Statement outlining management commitment to quality objectives.
- As part of the Quality Manual, the CB must document a clear organizational structure, which unambiguously defines ownership and documents job functions, responsibilities and reporting relationships of all staff engaged in delivering certification services.
- The CB must clearly identify the staff member accountable for the maintenance of the Quality Management System.
- The CB must have a list of everyone employed with the organization and maintain personnel records for all staff and auditors covering their qualifications, training, experience, affiliations, professional status, and any relevant consultancy to identify possible conflict of interest or risk to impartiality.

- The CB's senior management must demonstrate its commitment to the implementation of the Quality Management System and to review its continuing suitability, adequacy and effectiveness.
- A description of the management of the certification process including the CB criteria, terms of reference and procedures.
- The CB will provide an updated list of all individuals responsible for the technical review of BAP audit reports that include qualifications and practical experience.
- Details of management review policy and procedures, including frequency and documented results of such reviews. Reviews shall be conducted, at a minimum, annually.
- Document control procedures.
- Recruitment procedures, i.e., selection, initial training, ongoing training, and performance assessment for all relevant Certification Body personnel.
- A list of all subcontractors and a detailed procedure for their appointment, assessments, and their ongoing management.
- Procedures for actions in response to non-conformities and the effectiveness of agreed objective evidence presented, corrective and preventative actions taken.
- Procedures in relation to the use of the certificate, rules for granting, suspending or withdrawing a certificate, and the actions taken by the Certification Body should a suspension or withdrawal take place.
- Policies and procedures relating to appeals, complaints, and disputes.
- Procedures for conducting and documenting internal audits and for correction actions arising from internal audits.

CBs will be subject to a performance review according to the BAP CB Review procedure. CBs failing to meet the expectations of the BAP Program will be suspended from approval lists.


3.2 Contractual Agreements

With Best Aquaculture Practices: A contract is required between the CB and Best Aquaculture Practices. The contract will provide the basis by which a CB can undertake evaluations against the Standards for which they are approved.

With Applicant/Facility: The CB must ensure that an agreement with the Applicant/Facility is in place for the authorization of the provision of the audit report and any associated information to Best Aquaculture Practices.

The CBs agreement with the facilities shall include a provision to ensure that the CB is informed of any food safety prosecution, significant regulatory/food safety nonconformity or any product recall relating to food safety. CBs shall have procedures in place to ensure the integrity of certification after notification. The CB shall inform Best Aquaculture Practices of any such notifications.

With CB Personnel and Auditors: The Certification Body shall have in place agreements with all staff involved in the certification process that obligates them, at a minimum, to the requirements listed under 3.8.5 and 3.8.6. The CB shall further have agreements in place with all auditors, including subcontract auditors that include the items listed under 3.8.5 and 3.8.6.

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3.3 CB Accreditation Body Requirements, and Accreditation Scope Extension to BAP

There are two levels of CB approval for each Standard:

- 1) Restricted CB Approval Listing - for CBs seeking accreditation extensions of scope for specific Standards. This “Restricted” level allows the CB enough assessments to gain accreditation.
- 2) Full Approval Listing – for CBs which have gained accreditations for the specific standards.

The BAP Team will maintain an up-to-date list of CB Approval listings for each category.

3.3.1 CB’s Accreditation Body

The CBs Accreditation Body shall be a member of the IAF (International Accreditation Forum) and a signatory to the IAF Multilateral Recognition Arrangement (MLA). CBs registering/applying for BAP recognition shall disclose at that time whether or not they are aware of any circumstances that would reasonably or may reasonably lead to the withdrawal or suspension of their Accreditation. GSA shall have an open communication channel with the Accreditation Body as part of the arrangement with the CB.

3.3.2 Accreditation Extension to Scope against the GSA-BAP Standard(s)


As stated under 3.1, accreditation by a recognized AB to ISO/IEC 17065 is a pre-requisite for any CB to apply for recognition to BAP. Once a CB has been approved for listing by BAP, that CB must also seek an extension to scope of their ISO/IEC 17065 accreditation to include the GSA Seafood Processing Standard and the relevant GSA Standard(s). The CB will be put on a “Restricted CB Approval List” until each specific extension of accreditation scope has been achieved.

Best Aquaculture Practices recognizes that to achieve an extension to their scope of accreditation, CBs must be able to carry out evaluations against the Standard(s) they are seeking approval for. Therefore, a CB shall be allowed to carry out BAP audits, on a restricted number basis, prior to achieving accreditation extension, where they can demonstrate the following.

- An active application for an extension to scope against ISO/IEC 17065 accreditation to include the GSA Standard(s).
- Accreditation scope extension must be expected within a target of 12 months of the date of application to the Accreditation Body. An Accreditation plan shall be submitted to the BAP Team.
- Compliance with scheme and competency requirements.

Should accreditation to the scope of the GSA Seafood Processing Standard and/or other Standards not be granted within the time frame specified above, the CB’s approval shall be reviewed based on a formal risk assessment, and the CB shall resubmit a plan to the GSA for approval to achieve accreditation. GSA will decide on of the following after consultation with the relevant Accreditation Board:

- Allowance of a further set amount of time to gain accreditation.
- Termination of contract.

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A CB which has accreditation extension for a given standard will remain in Full Approval for 12 months after the publication of a new issue of the standard. After that period the approval rating of the CB will move from Full to Restricted and the CB's contract will be reviewed.

3.4 Accreditation and Membership Status

CBs seeking Full Approval Listing to assess against any GSA Standard must supply a copy of their ISO/IEC 17065 accreditation certificate to BAP. The CB shall only be placed on the Restricted CB List when it has applied for a new scope extension to a specific Standard(s).

A CB shall only be placed on the Full Approval List for a new Standard when it has gained accreditation for that specific standard. A copy of the accreditation certificate shall be provided to Best Aquaculture Practices, with reference to the version number or date of the Standard(s) made.

The CB shall make Best Aquaculture Practices immediately aware of any change of accreditation status or changes to ownership, management structure, of staff involved in the BAP certification process.

CBs will maintain membership for itself and any of its auditors performing services hereunder with the Association of Professional Social Compliance Auditors (APSCA), and any other organization as reasonably required by GSA at GSA's discretion.

The Certification Body shall have a publicly available and clear listing on their website of the range of accredited BAP certification services and what BAP certification services are not.

3.4.1 Scope of Expertise

CBs shall only work within the specific fields of expertise relating to the BAP seafood categories for which they are approved. CBs must demonstrate that their staff has the knowledge and expertise to work within these fields. CBs must also demonstrate appropriate training for auditors has been undertaken before requesting an extension to scope of an auditor's approval categories.

Note: Categories/fields of expertise under the BAP pertain to the scope of the Standards, i.e., seafood experience in categories: farms, hatcheries, feed mills, and seafood processing plants. Refer to the "BAP Auditor Competency and Course Approval Requirements" document where the specific BAP competency categories are defined.


The importance of fields of evaluation and auditor competence cannot be over emphasized and for Best Aquaculture Practices, their members, and other users, these are critical criteria, which are essential to support a legal due diligence defense.

3.4.2 Communication

Best Aquaculture Practices welcomes CB communications and information exchange. Best Aquaculture Practices will, from time to time, seek CB input into the GSA Standards, related documents, and audit process.

The CB must warrant and communicate to Best Aquaculture Practices that:

- Any and all offices that offer and make certification decisions, and/or issue certification to GSA shall be duly registered with Best Aquaculture Practices.
- Each auditor is qualified to perform the audit services he/she performs on behalf of the company in accordance with the criteria set out herein and other related BAP documents and has complied with all training and competency requirements.

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- It maintains an accurate record of the qualifications of each auditor and the training undertaken by such auditors.
- All factual information supplied to Best Aquaculture Practices and/or the Accreditation Body by the company is, or was when given, true, accurate and not misleading.
- The CB has the power and all necessary consents, licenses, and registrations to conduct their business and to enter into and perform the contract; and;
- The CB has read, understood, and shall comply with their obligations and requirements as laid out in this document and other BAP documents.

The Certification Body (CB) must demonstrate that it will carry out audits:

- With all due diligence, skill, and care.
- In accordance with the relevant Standard(s).
- In accordance with any conditions attached to their Accreditation and only in respect of the BAP Categories for which they are approved.
- Using only auditors who are trained and registered with Best Aquaculture Practices and meet the competencies of each of the relevant Standard(s) for undertaking such audits.

3.5 Extensions to Scope of BAP Recognition of Certification Bodies

Where a BAP recognized/approved Certification Body wishes to extend their scope to include a new GSA Standard, the request for an extension to the scope or recognition will need to be submitted to Best Aquaculture Practices. BAP will acknowledge and hold written notification from the CB of such a circumstance. The process for extending the scope of CB assessment is the same as for initial registration.

3.6 Management of Certification

3.6.1 Transfer of Certifications when facilities switch between GFSI-recognized Certification Programs.


Facilities certified to other GFSI benchmarked programs¹ may request to switch their certification to the GSA-Program. Since other GFSI benchmarked programs do not address the full scope of all GSA standard pillars, a scope evaluation is required. Criteria within this section describes how this may be achieved.

Any such transfer request will be communicated and agreed upon by the facility, the CB, and BAP.

Certification Bodies shall conduct an evaluation before accepting the facilities into BAP Program. The evaluation must include, but is not limited to the following:

- The facility's audit history
- Validity and terms of the certification being transferred
- Details of previous announced and unannounced audits of the certification being transferred

¹ <https://mygfsi.com/how-to-implement/recognition/>

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- Ensuring the CB is accredited to the facility's scope of certification and product category
- Ensuring CB auditors are approved to the scope of the GSA standard for which the certification is being transferred
- Complaints and/or grievances made against the facility during the current certification cycle
- Whether the facility has had food safety issues in its current certification cycle such as failed product testing or listing on international Import Alerts/ Refusals (e.g. US FDA Import Refusal)
- Whether product sampling and testing under the current certificate meets GSA-testing requirements
- Ensuring that, either through certification transfer or follow up audit, that the facility is in full compliance to the entire scope of the GSA standard for which it being transferred to, and how and when this can be verified.

The CB shall obtain and review, under consent by the facility, the following documents:

- Full audit report of the current certification
- Non-conformities and the associated corrective action documentation
- Current GFSI benchmarked program certificate
- Product and effluent test reports, if available.

Upon completion of the evaluation, the CB shall determine whether the request for certificate transfer is to be accepted, denied, or whether a supplemental audit is necessary for further assessment. This shall be communicated to BAP.

If a supplemental audit is required, the audit process, including disposition of NCs if applicable, shall be conducted per the Supplementary Audit Policy²

Once the certificate transfer has been accepted by the CB, the current certificate issued by the existing CB will be valid until the expiration stated on the certificate.


3.6.2 Transfer of GSA-BAP Certifications between CBs

There may be circumstances where a certificate needs to be transferred from one GSA-approved CB to another CB prior to start of a certification cycle, or a facility may make a request to the CB and GSA for such transfer.

Under this scenario:

- All non-conformities from a previous audit and/or investigations under the current certificate must be closed.
- The certification must be in good standing without any current or pending suspensions/withdrawals.
- Any ongoing Program Integrity investigation initiated by GSA must be completed before any such transfer can be made.

² PI - Policy - GSA BAP Policy on Supplementary Audits of Facilities (current version)

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The CB to which the certificate transfer will be allocated shall conduct an evaluation before accepting a facility's certificate. Evaluations and the certification process in such a case shall follow the requirements stated per 3.6.1 above as applicable.

3.7 CB Auditor Competence

Each auditor undertaking certification evaluations must have the appropriate qualification, training, experience and skills to perform an evaluation against the relevant GSA Standard(s).

The CB shall ensure that all auditors undertake such training as may be required in accordance with their accreditation and the GSA Standard(s). The CB shall ensure that any of its auditors performing services hereunder maintain competency/membership/certification with the Association of Professional Social Compliance Auditors, the Global Food Safety Initiative, and any other organization as required by BAP at BAP's discretion.

The qualification, training and experience will differ relevant to the product and technology covered by the scope of the individual GSA Standard; however, the auditing skills will not differ and shall be monitored to maintain a high standard.

Certification Bodies and their auditors are required to read, understand, and comply with the detailed requirements regarding competency described in the "BAP Auditor Competency and Course Approval Requirements."

3.7.1 Auditor Registration and Training

Best Aquaculture Practices will require the CB to register all auditors with Best Aquaculture Practices and provide details of the fields of evaluation to BAP for categories in which they are qualified to evaluate. The initial registration and updating of information is the responsibility of the CB.

The CB will hold a detailed and complete skills matrix or files for all auditors undertaking BAP evaluations. The Certification Body shall maintain records demonstrating how auditors comply with the requirements for qualifications, training and experience required under the GSA Standard(s). These records shall be kept up-to-date and provided to Best Aquaculture Practices upon initial auditor approval and thereafter upon request.

CBs shall promptly notify BAP when a BAP and CB approved auditor is no longer being used or has had their approval to conduct BAP audits suspended or revoked by the CB for any reason.


3.7.2 Auditor Qualifications, Training, Experience, and Competencies

The Certification Body must have systems and procedures in place to ensure that auditors conducting assessment meet the requirements, at a minimum, described below and elsewhere in this document. Additionally, the CB must ensure compliance regarding auditor qualifications as detailed in the "BAP Auditor Competency and Course Requirements" document or where a Certification Body, through documented procedures, can demonstrate through practical experience and supervised audits that the auditor has competence for the assigned audits.

BAP reserves the right to make the final decision regarding admittance of candidates to BAP Auditor Training courses.

3.7.3 Qualifications/Education

Language Skills: Demonstrate good written and verbal English capabilities

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Education: A degree in a relevant scientific field and/or other relevant education (as described below under “other education”).

- Some examples of relevant degrees include: Food Science, Microbiology, Veterinary Medicine, Aquaculture, Biology, or Chemistry.

Other Education: Other education combined with experience can be substituted in place of a degree requirement provided that education is deemed sufficient and can be verified through certificates. The other education must be directly applicable.

- Examples of other education include training or courses in: HACCP, GMP's, Sanitation, Hygiene, Quality Assurance, Microbiology and additional audit courses beyond that already required under item 3.7.5.

3.7.4 Total Work Experience

Processing Plants:

- – Auditors must have at least 2 years direct and full-time experience in a Seafood Processing Plant in a quality assurance or food safety function.

Farms:


- Auditors must have at least 3 years of experience for farms and hatcheries.
- Experience may take the form of 2 years of direct relevant industry experience and 1 year of continuous auditing experience.
- Continuous auditing experience for this purpose, is defined as no fewer than 6 seafood farms, and / or hatchery audits being conducted in a 12-month period.

Feed Mills:

- For feed mills, auditors must have at least 3 years of experience in animal and/or aquaculture feed mills (see “BAP Auditor Competency and Course Requirements” document for the specific BAP competency categories).
- Experience can take the form of positions held, previous experience in performing audits of facilities for the relevant BAP categories a candidate is seeking approval for, or both (Examples of positions held: quality assurance, production, food safety, product inspection, plant manager, farm manager, etc.). The auditor shall be able to demonstrate an understanding and knowledge of specific product categories for which they are approved.

Enhanced Social Accountability and Employee Health and Safety auditors shall have the following:

- Association of Professional Social Compliance Auditors (APSCA) Registered or CSCA status as defined by the APSCA Code & Standards of Professional Conduct and the APSCA Competency Framework.

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3.7.5 Formal Auditor Training

Recognized auditor course: Candidates shall have successfully completed recognized course(s) in audit techniques based on Quality Management Systems (QMS) or (Food Safety Management Systems (FSMS)).

- Examples of recognized courses include: ISO 9001, ISO 22000, BRC, FSSC 22000, SQF, IFS, ASQ, Certified Quality Auditor, ASQ Certified HACCP Auditor, or similar.
 - o The BAP Auditor Course is not a suitable replacement for an “audit techniques” course

HACCP training: Seafood processing plant auditor candidates must have previously successfully completed a training course in seafood-specific HACCP requirements based on Codex and the International Seafood HACCP Alliance curriculum. Feed mill auditor candidates must have previously successfully completed a HACCP training course.

BAP auditor training course: Candidates shall have successfully completed a Best Aquaculture Practices official auditor training course in the relevant GSA Standard(s).

The examination content shall as a minimum cover:

- General knowledge of the scheme
- Knowledge and understanding of specific seafood plant, farm, feed or hatchery processes, as applicable for the auditor’s established area of competency
- Understanding of quality management, pre-requisite programs such as hygiene and sanitation requirements, and food safety including (for processing plants) seafood HACCP.

3.7.6 Initial Training


A Certification Body training program for each auditor shall incorporate, at a minimum:

- An assessment of knowledge and skills for each field and sub field and assignment of fields evaluation
- An assessment of knowledge of food safety, HACCP, Pre-Requisite Programs, and traceability assessments, and have access to, and be able to apply relevant laws and regulations. In the case of farms, hatcheries and feed mills, similar relevant knowledge to also include sector-specific knowledge such as aquaculture systems, disease management, medicated feeds, and feed ingredient controls and, etc.
- A period of supervised training to cover the assessment of quality management systems and HACCP, specific audit techniques and specific category knowledge.
- A documented sign off, of the satisfactory completion of the training program by the appointed supervisor.

See 3.7 herein and the “BAP Auditor Competency and Course Requirements” document for more details.

3.7.7 Auditor Extension of Competency

For a currently approved BAP auditor to extend the scope of the standards they are approved to audit against, all the requirements must be met as described above and in the “BAP Auditor

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Competency and Course Requirements” document. That is, the CB must first verify that the above competency requirements have been met for the new category. This includes the experience and training requirements, attending, and passing a BAP course, and undergoing of the required training/shadow and witness audits described below in 3.8.1.

3.8 CB Auditor Experience

3.8.1 Initial Audit Experience – Shadow and Witness Audit Requirements

Note: See 3.10 for the competency requirements of the assessor conducting the shadow and witness audits.


Once an auditor has met the competency requirements and passed the BAP auditor course, they are not fully approved to audit on their own until they have successfully completed a series of supervised shadow and a final sign off (witness) audits against the relevant GSA Standard/competency category to the CB’s satisfaction. The number of shadow and witness audits per BAP category are as noted below.

CBs shall conduct more than the minimum number where the auditor performance during shadow and/or witness assessment indicates the auditor is not ready for approval and needs additional training and supervision. This is particularly relevant for auditor candidates that qualified almost entirely on industry/practical experience with no auditing experience.

“Shadow” audits are audits where training, discussion and direction can be provided to the auditor in training. In these audits the auditor-in-training passively observes (without interference to the audit process and/or the outcome of the audit) the already approved BAP auditor (Lead Auditor) conducting the audit. Based on the auditing experience of the auditor-in-training, the BAP approved auditor may assign some auditing tasks to the auditor-in-training (these are sometimes called observation audits by the CBs – this varies from CB to CB). However, the responsibility of the audit entirely rests with the Lead Auditor, including audit reporting, verification of CA evidence and closure of NCs.

“Witness” audits are audits where the final sign-off of the auditor-in-training occurs so he/she can audit independently. Therefore, the auditor-in-training must conduct the entire audit by himself/herself with no direction or commentary from the witness assessor. The witness assessor only observes and documents the witness audit outcome. Based on the report with all of the information and the witness assessor’s recommendation, the CB makes the decision, if the auditor is to be signed off and given final approval to audit on his/her own as Lead Auditor (independently) or undergo more shadow audits and another sign off (witness audit).

For Seafood Processing Plants: After passing the BAP course, newly approved auditors must successfully complete a series of supervised training (shadow audits) and a final “sign off” (witness audit) conducted on site at a number of different plants against the GSA Seafood Processing Standard. The total number and duration of these audits shall be a minimum of 10 audit days and 5 audits. Every shadow/witness audit shall be conducted by an assessor that meets the competencies defined in 3.10. BAP will accept up to two GFSI “C1” (Processing of Animal Perishable Products, which presently includes us, FSSC 22000, GRMS, SQF, IFS, and BRC) benchmarked scheme shadow/witness audits as equivalent to BAP shadow witness audits. *Shadow audits conducted to the standards of other GFSI recognized schemes for category C1 Processing of Animal Perishable Products and conducted at a processing plant for animal perishable products can also count toward the shadow audit requirements but not the final “sign*

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off” (witness audit). If BAP accepts two GFSI C1 audits, the auditor will be required to complete two BAP shadow audit and one BAP final sign off witness audit.

For Auditors Meeting the Combined Competency Requirements for Farms and Hatcheries:

As described above, for a total of 2 (1 shadow, 1 witness), conducted on site at a number of different facilities (e.g. 2 farms, or 2 hatcheries, or 1 farm and 1 hatchery) against a relevant GSA farm or hatchery standard. (The similarity in farm and related hatchery competencies are recognized and therefore allowed to overlap / replace one another for the purposes of Shadow / Witness). The relevant BAP standard shall be in compliance with the auditor competency categories as described in “BAP Auditor Competency and Course Approval Requirements” document. The auditor shall then be signed off, where competency has been demonstrated. Every shadow / witness audit shall be conducted by an assessor that meets the competencies defined in 3.10.

3.8.2 Submittal to BAP of Documented Proof of Final Auditor Sign off by the CB

The CB shall document the dates, duration, and location of the supervised shadow and witness audits described above along with their outcome. The CB shall submit to BAP this document or spreadsheet showing the status and progress of shadow and witness audit activities at BAP Request.

In any case, the CB shall submit to BAP, in writing, the notice of final approval of the auditor and the complete shadow and witness history upon final CB approval. This is required with or without BAP request. This information is necessary for BAP to maintain verification records of the auditor competency and in order to update the BAP auditor status records from “pending shadow and witness” to “approved.” The shadow and witness assessments must include specific comments by the witness auditor assessing the trainees attributes and competencies as described in Section 3.8.5 of this document regarding their professional conduct during the audit. Refer to section 3.8.5 for specific examples of expected auditor attributes.

3.8.3 Maintain Audit Experience

The CB shall have in place an annual program to maintain experience in the relevant GSA standard(s).


Seafood Processing Plants: To include at least 5 on site audits annually at a number of different organizations, against the GSA Seafood Processing Standard. In specific situations where this requirement cannot be met, the CB shall ensure that auditors complete at least 5 on site audits against a GFSI approved standard, and at least one on site audit against the GSA Seafood Processing Standard annually.

Farm/Hatcheries: At least 2 farm audits annually for each of the GSA farm/hatchery competency categories the auditor is approved for. As described in the “BAP Auditor Competency and Course Requirements” document.

Feed Mills: At least 1 per year to the GSA Feed Mill Standard and/or any credible International Feed Standard/Scheme.

3.8.4 Continuing Training, Refresher Training, and Competency Monitoring

BAP approved auditors shall attend a BAP auditor course for refresher training in the categories they are approved for at a minimum, every 3 years. The auditor will need to attend the refresher training course by either June 30th or December 31st of the respective 3rd year.

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If an auditor attends initial BAP auditor training course from January-June in year one, they must attend the 3-year refresher training course by June 30th of year three. If they do not attend the refresher training course, they will become inactive and suspended effective July 1st.

If an auditor attends initial BAP auditor training course from July-December in year one, they must attend the 3-year refresher training course by December 31st of year three. If they do not attend the refresher training course, they will become inactive and suspended effective January 1st.

If an auditor does not attend the refresher training course by the respective deadline, they will become inactive and suspended immediately according to the dates mentioned above and will remain inactive and suspended until attending and passing the next training course. If an auditor's credentials do lapse, they will have to register for the next training course as a 'new' auditor and be subject to the new auditor pricing. They will not need to complete the respective shadow/witness training though.

Auditors shall attend refresher training more often where the CB determines, during performance monitoring and calibration, that the auditor needs refresher training sooner. CBs shall promptly notify BAP where an auditor is unable to attend the required refresher training by the 3-year date. In such cases the auditor may be suspended until such time as the refresher training is successfully completed, depending on circumstances.

The auditor must be kept up to date with category best practice, and have access to and be able to, apply relevant laws and regulations.

Auditors shall undergo additional training by the CB whenever a new version of the GSA Standard(s), checklist, policies, guidance documents, etc. are issued. The CB shall maintain written records of all relevant training undertaken. It is the responsibility of the CB to ensure any auditor they are using undergoes proper and effective training in between attending full BAP auditor refresher courses.


Training and monitoring shall also include calibration across auditors and to the Standard(s), report reviews and comparisons, and so on.

Auditors shall be subjected to periodic testing by Best Aquaculture Practices against the relevant BAP Standard in addition to course attendance, at BAP discretion.

3.8.5 Attributes and Competencies

The Certification Body must have a system in place to ensure auditors conduct themselves in a professional manner. The following provide examples of required behavior.

- Ethical, i.e. fair, truthful, sincere, honest, and discreet
- Open minded, i.e. willing to consider alternative ideas or points of view
- Diplomatic, i.e. tactful in dealing with people
- Observant, i.e. actually aware of physical surroundings and activities
- Perceptive i.e. instinctive, aware of and able to understand situations
- Versatile, i.e. adjust readily to different situations
- Tenacious, i.e. persistent, focused on achieving objectives
- Decisive, i.e. timely conclusions based on logical reasoning
- Self-Reliant, i.e. acts independently whilst interacting effectively with others

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- Integrity, i.e. aware of need for confidentiality and observing professional code of conduct

3.8.6 Conflict of Interest, Confidentiality, and Code of Conduct

The Certification Body and the Auditors they employ, must avoid any conflict of interest, or breach of confidentiality or ethics. CBs are bound by a contractual agreement with Best Aquaculture Practices to abide by these requirements. Certification Bodies shall also have signed agreements in place with all auditors approved to assess against the GSA Standard(s). This agreement shall include, at a minimum, the following types of topics:

- Prohibitions against conflict of interest
- The requirement to divulge to the CB any potential conflict of interest (such as prior consulting, prior employment, and the like) before undertaking an audit, or that may arise during an audit
- A policy for the CB to investigate notifications of, or incidences or potential, conflict of interest and to exclude the auditor for a specific period (at least 2 years) where appropriate
- Prohibitions against consulting for, or soliciting consultancy or other types of work with a BAP applicant prior to or during an audit, and during the certification process
- Prohibitions against conduct or remarks that may, in the view of GSA Management, disparage the scheme, scheme management or owner and related staff, certified facilities, or associated organizations such as the Certification Bodies, Accreditation Bodies, GFSI, SOC, or similar.
- Prohibitions against using or sharing confidential information of facilities, Best Aquaculture Practices, the GSA, or other associated organizations


The Certification Body shall include in the auditor agreement at a minimum the above points, including specific codes of ethics / conduct obligations as outlined herein and under point 3.8.5. Copies of these agreements shall be provided to Best Aquaculture Practices upon request.

Any potential breaches of these requirements that come to the attention of the Best Aquaculture Practices by the Certification Body or its auditors will be brought to the attention of the CB. Conversely, the CB is required to also notify Best Aquaculture Practices of such matters that may come to their attention. At the discretion of Best Aquaculture Practices, such instances may result in sanctions, suspension, or withdrawal of approval of the CB, auditor, or both.

3.9 Subcontracted Auditors

Where Best Aquaculture Practices and CB approved auditors are independent subcontractors to the CB, all of the requirements detailed throughout this document relating to auditors, and CB responsibilities concerning oversight, training, and competency of auditors, etc., shall apply.

The CB shall not, at any time, use any subcontract auditor that has not been approved by Best Aquaculture Practices.

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3.10 Certification Body Personnel and Competency

Note: This section discusses CB administrative/management personnel involved in BAP program management, the assignment of auditors, technical reviews, etc. Auditors are discussed separately above).

Certification Body personnel involved in any aspect of the BAP certification process shall be impartial and competent for the functions they perform, including making required technical judgments, framing policies and implementing them. Clearly documented instructions shall be available to the personnel describing their duties and responsibilities. These instructions shall be maintained and kept up to date.

In order to ensure the evaluation and certification are carried out effectively and uniformly, the minimum relevant criteria for the competence of personnel in relation to BAP certification shall be defined by the Certification Body and combined should be equal to that of the auditor.

CB's must ensure that a sufficient level of understanding of the GSA Standard(s) exists within their organization at all times. All staff with a key role in the BAP certification process, regardless of their specific function or name of the group (technical committee, review committee, certification committee, etc.) shall have demonstrated experience and knowledge regarding seafood audit processes, corrective action evidence review, and the applicable GSA Standard(s). This includes, for example, functions such as the review of audit reports, nonconformities and corrective action evidence and making decisions regarding certification and other related activities.

At least 1 member of the Certification Body involved in the BAP program management or administration shall attend a Best Aquaculture Practices auditor training course.

Information on the relevant qualifications, training, and experience of each member of the personnel involved in the BAP certification process shall be maintained by the CB. Records of training and experience shall be kept up to date. These records shall include at a minimum:

- Name and address
- Organization affiliation and position held
- Educational qualifications
- Experience and training related to seafood, audit processes, assessment of audit reports and corrective action evidence, and the relevant BAP Standard(s) 5 Records including dates, related to training and education


Personnel utilized by the CB to conduct auditor training, calibration and competency reviews shall also demonstrate proper experience, training and competencies as described above.

Records of CB personnel training, experience and competency shall be provided to Best Aquaculture Practices upon request.

CBs shall provide to BAP, an organizational chart that defines the personnel involved in the BAP scheme and their functions related to BAP. This chart shall be kept up-to-date, and BAP shall be notified promptly, in writing, of any changes to such personnel.

3.11 Limitations to the Use of the Same Auditor for the Same Facility

- The same auditor shall not be used to audit the same facility more than 3 times in a row and less if the CB policy is more restrictive and also if the CB or BAP have any concerns about the accuracy or bias of any auditor.

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- After the limit is reached the CB is to rotate auditors for at least 1 audit and longer if CB policy is stricter.
- BAP endeavors to inform CBs if an auditor has been used three times in a row in cases where they performed the audits with another CB. CBs are also required to track this themselves.

Note: It is STRONGLY advised that CBs use a non-local (out of country) auditor every third time, or whenever auditor performance may be questionable, to prevent potential local bias from affecting the integrity of the audit outcome. (Combining audits to save cost when flying someone in should be done where possible).


3.12 Competency Requirements for Assessors Used by CBs to Conduct BAP Training/Shadow and Witness Audits

For BAP related training/shadow and witness auditing: the training/shadow and witness audits performed against the BAP scheme by the CB are crucial in protecting the integrity of the scheme by ensuring the competency and proper interpretation of the Standard(s) by the auditor under assessment. For that reason, CBs are required to ensure that personnel they use to conduct such training/shadow and witness audits under BAP have a high level of experience and proper training in order to ensure the robustness of these assessments.

3.12.1 Training/Shadow and Witness Assessor Training and Reporting

The CB shall ensure the personnel conducting assessment audits of other BAP auditors have been properly trained in conducting such assessments. The CB shall further ensure that a report format, checklist or template is provided for documenting the assessment outcomes for all relevant categories. The report shall include, but is not necessarily limited to:

- The facility where the assessment is taking place and the type of facility (farm, plant, etc.)
- Whether or not the audit is a training/shadow/observation audit, or a witness audit.
- Whether or not the assessment audit is the first, second, third or sign off/approval audit or surveillance audit etc.
- The name of the shadow and/or witness assessor, and of the auditor under assessment
- Anyone else that is part of the audit team (technical expert, CB management observer etc.)
- Any areas of improvement needed
- Audit preparation
- The opening meeting
- Accuracy of interpretation of the BAP Standard clauses and intent
- Accuracy and clarity of statements of conformity and non-conformity
- Whether or not proper objective evidence was obtained and cited for both conformity and non-conformity
- Proper assignment of non-conformance levels

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- Proper control over the audit process and time management (e.g. allowed facility delay and disorganization to compromise the audit and audit duration. Waited for each item during delays instead of moving on to another clause. Failed to remember to go back to “pending” items. Spent too long on some sections and too short on others. Excessive delays created by auditor disorganization).
- Time allocation: proper amount of time spent on site versus document review
- Audit duration: proper amount of time spent to conduct a proper audit (not too long, not too short)
- Professionalism
- Appropriate questioning techniques (open-minded, not leading, not threatening, not confusing)
- The closing meeting
- Provision of a non-conformance summary to the facility before leaving
- Clarity of the overall report writing
 - Where the minimum required shadow/witness audits have occurred as defined by competency category previously, whether or not the auditor is recommended to proceed to witness auditing, or if more shadow/training audits are required
 - Where the final witness audit has occurred, whether or not the auditor is recommended for full approval, or needs more supervised audits first
- Other items as deemed appropriate by the CB


3.12.2 Training/Shadow and Witness Assessor Experience Requirements

The qualifications for the person conducting the BAP training/shadow and witness audit/assessments are one of the following options:

A. A Senior BAP auditor

1. This is a currently approved BAP auditor for the category being assessed. (At the time of this writing there are 7 separate competencies. See “BAP Auditor and Competency and Course Approval Requirements” document for details).
2. May be either an employee of the CB or an independent subcontractor
3. Has properly conducted in their own, a minimum number of BAP audits in the relevant category, as follows (NOTE – shadow and witness audits DO NOT COUNT toward the below):
 - i. Seafood Processing Plants = 20 Audits
 - ii. Farm/Hatchery Combined Qualification = 15 audits where the auditor is approved for farm/hatcheries, a combination of farms/hatcheries in related categories that add up to 15 (i.e. some salmon farms and some salmon hatcheries = 15 total).

B. A Senior Auditor in a Different but Relevant Scheme

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1. Is not an approved BAP auditor but has significant, senior auditing experience of at least 3 years in another scheme and has conducted at least the number of audits relevant to BAP as described under point 3 below.
2. Has studied, in advance of approval to do BAP assessments, the relevant BAP standard in depth to ensure understanding of the differences in the BAP standard versus the standard(s) the auditor is experienced in. This length of study shall be a minimum of at least 24 hours. The CB shall document the hours of BAP related study and submit the records of the said study to Best Aquaculture Practices.
3. Relevant “Other Scheme” Experience
 - i. Seafood Processing Plants = 25 seafood plant audits to another processing plant standard currently recognized by GFSI (the auditor shall have been approved to audit to the other standards for seafood categories. Non-seafood category audits shall not count. For example, BRC or SQF audits conducted in poultry plants are not accepted. Similarly, auditors approved to or audits conducted against GFSI recognized Global Red Meat Standard shall not count).
 - ii. Farms/Hatcheries = 20 audits conducted against the ASC or Global GAP Aquaculture farm/hatchery standards for the relevant BAP category. Or a combination of ASC and Global GAP audits to the proper BAP category (see “BAP Auditor Competency and Course Approval Requirements”

C. Senior Auditor with Combined BAP and Other Relevant Scheme Experience

1. Has a combination of BAP and other relevant scheme experience in the proper BAP category being assessed
2. Combination experience requirements:
 - i. Seafood Processing Plants = 20 seafood plant audits to both the GSA seafood processing standard and one or more GFSI recognized processing plants schemes where that auditor is approved under that scheme for seafood processing plant categories. Only seafood processing plant audits will count (See “B 3 i above). Of these 20 audits, a minimum of 10 shall have been properly conducted against the GSA Seafood Processing Standard.
 - ii. Farms and hatcheries = 15 audits. A combination of BAP, ASC, and/or Global GAP in the relevant BAP category as described under “B 3 i” above. Of these 15 audits, at least 8 shall have been properly conducted against the relevant BAP farm and/or hatchery standard.

3.12.3 Audit Team Leader Competence and Experience Requirements

An audit team leader must have acquired additional audit experience to develop the competence described below. This additional experience must have been gained by working under the direction and guidance of a different audit team leader either as part of GFSI or GSSI benchmarked programs. If there is no option of gaining such experience, the CB must conduct training of the audit team leader in the below aspects.

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In order to facilitate the efficient and effective conduct of the audit an audit team leader must have the competence to:

- a) plan and assign audit tasks according to the specific competence of individual audit team members.
- b) manage the audit process, including:
 - making effective use of resources during the audit.
 - managing the uncertainty of achieving audit objectives.
 - protecting the health and safety of the audit team members during the audit, including ensuring compliance of the auditors with the relevant health and safety, and security arrangements.
 - directing the audit team members.
 - providing direction and guidance to auditors-in-training.
 - preventing and resolving conflicts and problems that can occur during the audit, including those within the audit team, as necessary.
- c) represent the audit team in communications (including the opening and closing meeting) with the facility, the CB and GSA.
- d) lead the audit team to reach audit conclusions.
- e) prepare and complete the audit report.

The above competence must be ascertained by the CB and keep documentation as to how the audit team leader gained this experience. The CB must provide this documentation to BAP upon request.

3.13 Use of the BAP Certification Mark

The BAP logo is the property of GSA and its authorization and rules for use are controlled via an agreement between Best Aquaculture Practices and certified facilities approved by the CBs.

3.14 Bribery and Fraud


This policy has been developed to establish controls defining ethical and acceptable auditor behavior before, during and after the auditing process of a facility. The ethics of BAP auditors and approved Certification Bodies is at the heart of program integrity.

This policy applies to all BAP approved auditors and Certification Bodies that conduct third party assessments for the Global Seafood Alliance BAP Certification Program.

All BAP approved auditors and Certification Bodies are expected to conduct themselves with the utmost ethical behavior. Auditors shall immediately report to their CB any attempts by a facility to offer gifts, money, or personal favors to garner favorable results in the certification process. Certification Bodies are to immediately inform the GSA Program Integrity Department of any reported fraudulent, or unethical behavior reported by their auditor.

Auditors shall not accept offers including, but not limited to:

- Money
- Personal favors

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- Tickets or access to events
- Items of material value
- Off-site meals: It is reasonable for a facility to provide an auditor lunch on site during the assessment, but inappropriate for an auditor to go out with representatives from the facility being audited off premises

Any claims by a facility regarding misconduct by an auditor, such as demanding a bribe for a favorable audit, shall be investigated by the Certification Body in conjunction with the GSA Program Integrity Department.

It shall be the responsibility of the Certification Body to investigate and ultimately decide on disciplinary actions for their employees, or contracted auditors who are accused and or determined to be guilty of fraud, bribery, or unethical behavior. The results of the Certification Bodies investigation shall be reported to the GSA Program Integrity Manager.

Facilities who are accused of bribery or providing false documentation to an auditor shall be investigated by the BAP Program Integrity Department with the full cooperation of the Certification Body. Ultimately, it shall be the responsibility of the BAP Program Integrity Manager to determine actions against facilities accused of and/or determined to be guilty of unethical behavior, up to and including termination from the BAP Certification Program.

Investigation results shall not be disclosed or discussed with anyone other than those with a legitimate need to know. This is to protect the reputation of those who may be accused, but ultimately found innocent of wrongdoing.


4.0 The Audit Process

4.1 Information to Applicants

The CB shall ensure the Applicant has or is provided with all relevant and up-to-date information related to the GSA standard(s) including the standard(s) themselves, any interpretation guidelines, and relevant audit policies.

The Certification Body shall also require that each applicant:

- Always complies with the relevant provisions of the certification program
- Makes all necessary arrangements for the conduct of the evaluation, including examination of documents, access to areas, records, personnel, etc.
- Make claims regarding certification only in respect of the scope for which certification has been granted (see 1.6 “Certification and Assessment Scope”).
- Does not use its certification in such a manner as to bring the CB, BAP Management or any other associated organizations into disrepute and does not make any statements regarding its certification that the CB may consider to be misleading or unauthorized
- Upon suspension or withdrawal of certification, discontinues use of all advertising material that contains any reference thereto and returns any certification documents as required by the CB and Best Aquaculture Practices

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4.2 Audit Frequency

It is the responsibility of the Applicant facility to maintain valid certification. Generally, the audit frequency for audits against all GSA Standards is once every 12 consecutive calendar months from the date of the initial audit and not the date of the issue of certificate by the CB or date of the BAP validation letter. (Also refer 4.13 – Certificate Validity for further explanation on audit frequency and certification cycle).

Recertification audits must occur per KPIs stated under 5.2. This provides for sufficient time for the submission of corrective actions and closure of nonconformities, if any, and does not affect continued certification. Audits must not occur beyond the abovementioned window as this would affect the certification cycle as well as other program related aspects.

Under extreme circumstances of “Force Majeure” like weather events, public safety situations, natural calamities, events that does not allow auditors to travel due to country cross-border close downs, etc., the CBs and/or facilities must formally request the BAP for a written approval to issue a temporary extension to the recertification audit timeframe stated above and the certificate expiration date. In situations that require a permanent change to the recertification audit date, a prior written approval by the BAP Management to the CB and the facility is a must and the facility’s new recertification date may be changed. In such a case the new recertification date will be the new initial certification audit date going forward. The timeframe of the temporary extension is to be agreed upon by the CB and BAP Management.

The only exception to the 12-month recertification audit rule is for GSA Salmon Farms Standard under the Group Program where audits occur on a biennial frequency starting from the initial audit date. In this case a surveillance audit is required at the end of 12 consecutive calendar months from the initial audit date.

In circumstances where the CB technical review committee or CB Certification Committee finds an additional nonconformity upon review of the audit documentation, and/or if the results of effluent and/or product test reports leads to the issue of an additional nonconformity, the CB must issue a temporary extension to the recertification audit timeframe (stated above) and the certificate expiration date. The timeframe of the temporary extension is to be agreed upon by the CB and BAP Management.


4.2.1 Audit Frequency for Seasonal Facilities

There are situations of seasonality where the certification cycle might be affected. Seasonal processing/production activities are those major production activities that facilities conduct during a short time period of not more than 4 to 5 consecutive calendar months in a 12-month period.

A facility that is open all 12 calendar months per year that processes or produces different products based on different seasonal product availability would not be considered a Seasonal Facility since they operate continuously year-round.

Initial certification and subsequent recertification audits for facilities that are involved in seasonal processing/production activities shall be completed within the operational window of the seasonal production. For example, a seafood processing plant processing product only during winter (some crabbing facilities/activities or lobster processing activities) would need to have its audit completed in the winter while processing under normal operations. CBs and facilities must carefully schedule audits so that certifications do not lapse.

In situations where there is a significant temporary change in seasonal facility processing/production operations that would affect the recertification audit timeframe, the

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Certification Body and the seasonal facility must formally request from BAP a written approval to issue a temporary extension to the recertification audit timeframe. The timeframe of the temporary extension is to be agreed upon by the CB and BAP Management. In situations that require a permanent change to the recertification audit timeframe, the Certification Body and the seasonal facility must formally request a prior written approval from BAP. In such a case the new recertification date will be the new initial certification audit date going forward. Non-conformities issued at the seasonal facilities must be closed out per policies stated in 4.7.

4.3 Unannounced Audits (under GFSI benchmark – SPS)

Per GFSI benchmark requirements, facilities certifying under the GSA Seafood Processing Standard (SPS) must undergo one unannounced audit every three years. These unannounced audits shall be planned and conducted by the CB. The criteria detailed below applies for all unannounced audits.

4.3.1 Timing of Unannounced Audits

Initial audits of new facilities shall not be unannounced. Initial unannounced audit years shall be confirmed during the recertification application process and requirements shall be agreed upon as stated herein. Once an initial unannounced year is determined, subsequent unannounced audits must be conducted at least once every three-year period. Dates of unannounced audits during corresponding audit cycles shall be determined by the assigned CB. During the unannounced audit cycle the CB shall give notice to the facility that an unannounced audit is pending. Said notification shall:

- be made by the CB more than ninety calendar days prior to the certificate expiration date.
- initiate finalization of any agreements and communications required between the CB and the facility to conduct the audit.
- specify a 60-day window in which the unannounced audit shall take place.
- communicate to the facility that adequate personnel must be available, during normal business operating hours, within the 60-day window stipulated for the audit.


Once the communication as cited above is made by the CB to the facility, the facility may elect to request a black-out period of two weeks (14 calendar days) within the 60-day window to accommodate shut-down periods, non-production days, or annual maintenance that the facility might have to undertake. Such request by the facility should be made within 10 calendar days of the notice by the CB described above. Such black-out period must be agreed upon by the CB and the facility.

All pre-audit communications shall cease within 80 calendar days prior to the certificate expiration date. If unforeseen circumstances require additional communications within this time frame, the ability to conduct the recertification audit before the certificate expiration date may be impacted, and all such communications shall be cc'd to GSA Program Integrity.

Unannounced audits must not take place on weekends (or holy/religious days) or official holidays in the region where the facility is located. For seasonal facilities, the 60-day window may be reduced at the discretion of the CB to accommodate seasonal variations.

4.3.2 Unannounced Audit Operational Criteria

All unannounced audits shall be conducted either on-site or as a blended audit. Remote audits do not qualify for unannounced audits. Unannounced audits shall be conducted to the standard version to which the facility applied to.

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If the facility denies the CB Auditor access to the site, the facility's certificate may be suspended/withdrawn at the discretion of the CB. The CB must immediately inform GSA. If, due to justifiable reasons (valid reasons beyond the control of the facility), the facility cannot accept the unannounced audit when the auditor arrives at the facility, the auditor shall notify the CB for a determination as to whether the audit may continue or be rescheduled. Rescheduling of the audit makes the unannounced audit invalid. The CB shall inform BAP of any such outcome.

Auditors shall be trained by CBs in unannounced audit protocols. All KPIs and timelines for report submission, NC closures, technical reviews and certification decisions are similar to that of announced audits. "Certification" and "No-certification" decision by the CB also shall be determined in a similar manner as that of announced audits.

4.3.3 Unannounced Audit Process

Duration and process of unannounced audits shall be similar to that of announced audits as specified in the CB Requirements document. Unannounced audits shall follow the process as outlined in the "Unannounced Audit Policy for SPS Audits" document.

4.3.4 Audit Reports and Certification

Audit reports and certificates issued by the CB following a successful unannounced audit must clearly identify that the audit was "Unannounced" in addition to specifications in the relevant sections of this document. Limited scope, supplemental, or re-audits necessitated based on results of unannounced audits shall be announced unless otherwise specified by GSA.


4.4 Audit Duration

Refer to the GSA Audit Duration Policy³.

4.5 Audit Format

The CB shall be mindful that the audit format consists of systems review, documentation and records review, and physical inspection of the site and production processes. Time allocation during the audit shall be such as to provide sufficient and proportionate time for each activity to be carried out in full. Where appropriate, additional time may be granted for investigations. Formal requests to extend allocated audit durations must be made by the CB to BAP in writing. Such requests shall not exceed 25% of the time initially allocated for the audit in question.

³ Currently in final draft under pilot testing.

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A. CB responsibilities prior to audit.

- Review of the facility application to ensure the scope, products, and processes are properly defined and to include resolution of any questions, unclear or missing information prior to assessment.
- Audit duration is accurate per the scope the facility applied for.
- Audit preparation, planning and scheduling, including assignment of a qualified auditor that is available within a reasonable time frame.
- Where possible, preliminary document assessment in advance.

B. Required auditing elements.

- Opening meeting
- Site assessment
- Collection of necessary Samples for Testing
- Review of Management systems, records, documents, and procedures
- Employee interviews
- Traceability exercises
- Review of non-conformities identified and prepare NC report
- Closing meeting
- Provision of a non-conformance summary to the facility and CB
- The auditor will complete a formal audit report

All sections of the standard shall be covered by reviewing the Applicant facility's documents, records, and related procedures, together with an inspection of production facilities.


C. Seafood Processing Plants

With publication of the Seafood Processing Standard Issue 5.0, facilities that produce both farm raised and wild caught species have an option to choose the scope of certification to be either: i) "only farm raised", ii) "only wild caught" or iii) "both farm raised and wild caught" species categories. The auditor shall witness products and processes listed below per scope of the applicant facility during the assessment.

The scope of certification is detailed below.

1. Only farm raised – must be processing at least one farm raised species.
2. Only wild caught – must be processing at least one wild caught.
3. Both farm raised and wild caught – must be processing at least one species from either of the categories (farm raised and/or wild caught).

In addition to the criteria stated for points 1-3 above, the auditor must witness, if available, production processes for RTE products and high-risk processes per the scope of certification elected by the facility. If the facility has such below stated RTE production processes within the scope of certification but does not have production during the initial audit, the auditor shall note

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this in the audit report and the CB shall inform the facility that a supplemental audit is necessary to review the production of such products and their HACCP/food safety and other related documentation before it can be included in the scope of current certification.

Examples of RTE products and high-risk processes (not an exhaustive list):

- Processes involving Scombrototoxin formation.
- Processes involving Clostridium botulinum toxin formation.
- Specific allergens with processes like breading, battering, marinating with spices – to verify both the allergen cross contamination and change over processes as well as Staphylococcus aureus toxin formation.
- Processes involving Staphylococcus aureus (S. aureus), Listeria monocytogenes (L. mono) and Clostridium botulinum (C. botulinum) pathogenic growth – e.g. drying, smoking, LACFs, Acidified Foods.
- Processes involving Natural Toxins – Molluscan Shellfish, Finfish (primarily reef fish), Dungeness crab or other finfish.
- Processes involving raw ready to eat products – e.g. Sushi.


Documents, records, and procedures for all species within the scope of certification and the associated processes and product forms that the facility produces are subject to assessment as part of the traceability and mass balance exercises, whether or not they were produced at the time of the audit.

CBs must understand that though seafood processing plants opting to achieve certification to SPS that produce both farm raised, and wild caught species have an option to choose the scope of certification to be either: i) “only farm raised”, ii) “only wild caught” or iii) “both farm raised and wild caught” species categories as stated above. However, within the selected scope of certification and considering exclusions, the CB will conduct an audit to cover all parts of the facility and product forms that the facility produces. Within the selected scope of certification and considering exclusions, Applicants cannot prohibit the CB auditor to particular rooms, process lines, cooked versus raw products and/or species during the assessment.

Example: A seafood processing facility producing both farm raised and wild caught species, and applying for SPS certification, may elect to certify only farm raised species as their scope of certification. The scope of the audit would therefore be limited to farm raised species and production processes only. However, the auditor must be allowed access to all rooms and production lines within the entire facility, including all storage units and production areas, to ensure that the full scope of certification is being met, regardless of facility designations for only farm raised and/or wild caught species production. This is to verify that there is no cross contamination between farm-raised and wild caught species and their production processes, including any incidental or inadvertent substitution where there are similar species of farm-raised and wild-caught being processed at the facility.

D. Farms, Hatcheries and Feed Mills

Applicants **must** be in operation at the time of the audit. Farms and hatcheries **must** be stocked and in production. Feed Mills must be producing aquaculture feed (in case they also produce feed for terrestrial animals and/or pet food) per the scope of the certification.

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4.6 Audit Teams

Audit Team Definition – More than one auditor conducting an audit. One auditor of the audit team is appointed as the audit team leader. NOTE: This section does not apply to Enhanced Social audits.

4.6.1 Audit Team Structure

The CB, where there is a necessity for an audit team, must select auditors and allocate them as an audit team including the appointment of an audit team leader per competence and experience stated under clause 3.12.3 above. The CB must consider the following when assigning an audit to an audit team.

- Audit duration.
- The overall competence of the audit team, taking into account audit scope and criteria.
- Type and complexity of the processes to be audited.
- The ability of the audit team members to work and interact effectively between themselves and with the audit team leader and with the representatives of the facility and other relevant interested parties.
- The relevant external/internal issues, such as the language of the audit, and the facility's social and cultural characteristics. These issues may be addressed either by the auditor's own skills or through the need for interpreters.
- Size and composition of the audit team.

Changes to the composition of the audit team may be necessary during the audit, e.g., if a conflict of interest or competence issue arises. If such a situation arises, the conditions for changes to the audit team must be resolved with the appropriate parties (e.g., audit team leader, the CB, audit client or facility, BAP) before any changes are made.


Shadow and witness audits could be part of the audits involving audit teams per criteria stated in section 3.8.1.

The Audit Team Leader and audit team members must be competent in the scope of the audit and must be approved by BAP for the said category. The assignments of the various audit tasks and/or portions of the standards to be audited is the responsibility of the audit team leader and the audit team members must abide by his/her decision.

Where matters of conflict or other ineffective interaction/communication arise within the audit team during the audit, the audit team leader must resolve them so as to not affect the audit process. The audit team leader's decision must be respected by the audit team and his/her decision would be final. In case these cannot be resolved the audit team leader must inform the CB who will inform BAP for further resolution of the issues of disagreement.

The audit team leader is the primary contact for the audit and hence must make arrangements for the audit to place in an effective manner to achieve the objectives of the audit including but not limited to the below.

- confirm communication channels with the facility.
- confirm the authority to conduct the audit.
- provide relevant information on the audit objectives, scope, criteria, methods.

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- request access to relevant information for planning purposes including information on the risks and opportunities the organization has identified and how they are addressed.
- determine applicable statutory and regulatory requirements and other requirements relevant to the activities, processes, products and services of the facility.
- confirm the agreement with the facility regarding the extent of the disclosure and the treatment of confidential information.
- make arrangements for the audit including the schedule/plan.
- determine any location-specific arrangements for access, health and safety, security, confidentiality or other.
- agree on the attendance of observers and the need for interpreters for the audit team.
- determine any areas of interest, concern or risks to the facility in relation to the specific audit.
- resolve issues regarding composition of the audit team with the facility or audit client.

4.6.2 Audit Planning


Audit planning must consider the risks of the audit activities on the facility's processes and provide the basis for the agreement among the audit client, audit team and the facility regarding the conduct of the audit. Planning shall facilitate the efficient scheduling and coordination of the audit activities in order to achieve the objectives effectively.

The amount of detail provided in the audit plan must reflect the scope and complexity of the audit. In planning the audit, the audit team leader shall consider the following:

- The composition of the audit team and its overall competence.
- The appropriate audit sampling techniques.
- Opportunities to improve the effectiveness and efficiency of the audit activities.
- The risks of not achieving the audit objectives due to ineffective audit planning.
- The risks to the facility due to the audit team approach (e.g., presence of the audit team members adversely influencing the facility's arrangements for health and safety, environment and quality, and its products, services, personnel or infrastructure).

Audit planning and preparation must address the need for the audit team to familiarize themselves with facility's facilities and processes. Audit plans must be presented to the facility ideally prior to the audit.

The audit team leader, in consultation with the audit team, shall assign to each team member responsibility for auditing specific processes, activities, functions or locations and, as appropriate, authority for decision-making. Such assignments must take into account the impartiality and objectivity and competence of auditors and the effective use of resources.

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4.6.3 Audit Process

During the opening meeting, which must be chaired by the audit team leader where he/she must make arrangements to introduce the audit team and their roles. The audit team leader must also confirm the audit plan and other relevant arrangements as below with the facility.

- The date and time for the closing meeting.
- Interim meetings between the audit team and the facility's management.
- Any changes needed to the audit plan.
- Keeping the facility informed of audit progress during the audit.
- Availability of resources needed by the audit team.
- Confidentiality and information security.
- Access to all areas of the facility.
- Health and safety, security, emergency, and other arrangements for the audit team.

Audit team meetings must be held, as appropriate, by the audit team leader in order to allocate work assignments and decide possible changes. Changes to the work assignments can be made as the audit progresses in order to ensure the achievement of the audit objectives. The audit team members must collect and review the information relevant to their audit assignments and prepare documented information for the audit, using any appropriate media. The documented information for the audit can include but is not limited to:


- physical or digital checklists.
- audit sampling details.
- audio visual information.

During the audit, it may be necessary to make formal arrangements for communication within the audit team, as well as with the facility. The audit team must confer periodically to exchange information, assess audit progress and reassign work between the audit team members, as needed. The audit team leader must periodically communicate the progress, any significant findings and any concerns to the facility, as appropriate.

All audit team members must submit their portion of the audit evidence to the audit team leader for him/her to collate compliance as well as non-compliance issues and prepare the final audit report per clause 4.8. The audit team leader must check with the audit team members from time to time as to the progress of the audit. The closing meeting is always chaired by the audit team leader.

The audit team leader may seek the assistance of the audit team members review of objective evidence obtained to close non-conformities identified, if any and it is obligatory for the audit team members to assist the audit team leader until the certification decision is made by the CB.

The CB must have a process in place to evaluate the outcome of the audits conducted by audit teams. The results of such evaluations must be documented and shared with BAP as and when requested. Also, the results must be used to effect improvements of the audit process.

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4.7 Non-Conformance Categories, Reporting, and Closure Time Frames

Any Non-Conformances identified during the audit must be recorded by the CB auditor as either:

NC Rating	Definition	Required Action
Critical	Where there is a serious failure to comply with a food safety, social compliance and/or legal issue and/or a risk to the integrity of the scheme.	The auditor will immediately inform the Certification Body, who will inform the BAP office. Immediate temporary suspension may ensue pending clarifications for certified facilities and a re-audit may result for new facilities.
Major	Where there is a substantial failure to meet the requirements and/or intent of any clause in the Standard but there is no food safety risk, social compliance, legal issue or immediate risk to the integrity of the scheme. (Generally, policy)	Objective evidence verifying the proper implementation of corrective action and closing of non-conformities shall be submitted to the Certification Body in accordance with BAP certification management rules.
Minor	Where absolute compliance with requirements and/or the intent of any clause in the Standard has not been demonstrated. The matter does not rise to the level of Major or Critical and tends to be lower risk issues or isolated instances rather than patterns. Not indicative of an overall breakdown in compliance and systems.	Objective evidence verifying the proper implementation of corrective actions and closure of non-conformities shall be submitted to the Certification Body in accordance with BAP certification management rules.

The CB auditor must record this in the audit report and communicate the details to the CB. Objective evidence which properly verifies corrective action implemented, including addressing of root cause, shall be submitted to the CB by the facility (all facilities – processing plants, farms-standalone, groups, clusters, hatcheries, feed mills) within 35 calendar days from the day following the end of the audit.

At the closing meeting, the auditor shall present his/her findings, and discuss all nonconformities that have been identified during the audit but shall not make comment on the likely outcome of the certification status. A written summary of the nonconformities discussed at the closing meeting shall be left with the facility upon completion of the audit.

A written non-conformance summary shall be provided to the CB by the auditor within 48 hours of the audit completion. This time frame may be extended by 1 or 2 days under extenuating circumstances.

The CB technical person or committee shall review the non-conformance summary promptly within the allocated timeframes stated under clause 5.2 below.

This review shall ensure the non-conformance statements are clear, the severity/rating of nonconformity assigned is appropriate to the non-conformance statement and intent of the clause, and the auditor has not cited multiple non-conformities for the same deviation at multiple clauses.


Once the non-conformance summary has been approved by the CB technical committee, it shall be immediately forwarded to Best Aquaculture Practices along with page 1 of the audit report. BAP shall receive this information no more than 10 calendar days from the date the audit was completed.

All nonconformities issued during the audits must be closed prior to granting the certification for all facility types. In circumstances where the corrective action involves structural changes, engineering modifications, and for seasonal facilities when nonconformities cannot be corrected within a 35-calendar day timeframe due to lead times for structural improvements and equipment installation, any extraordinary circumstances and/or due to seasonal production shutdown prior to the deadline for submitting corrective action evidence, the nonconformities shall be conditionally closed out pursuant to the below conditions:

- CB must notify the BAP.
- The nonconformity must be of a **Minor** rating.
- The nonconformity must not be for a deviation related to food safety and/or legal issues.
- Temporary action is taken by the facility to correct the deviation and a detailed plan with a definitive timeframe for closure must be sought by the CB from the facility.
- CB must approve the temporary corrections, the corrective action plan and timeframe.
- CB must periodically verify the actions taken by the facility per their CA plan.
- CB auditor and/or technical committee shall document all details of justification of the conditional closure, how the risk is being controlled, and the agreed completion date.
- Such nonconformities along with their corrective actions shall be verified during the subsequent recertification audit and for facilities under group scheme these shall be verified during the surveillance audits.
- Any nonconformities that are not closed out during the subsequent recertification audit shall be escalated to the next higher NC rating (e.g. a minor NC will be escalated to a Major NC).

Major NCs must be closed out within the timeframe of 42-calendar days and/or prior to the end of the season for seasonal facilities. These cannot be left open to achieve certification.

Repeat nonconformities from the previous audit are to be cited as repeats in the nonconformity summary report and audit report of the next audit. Repeat nonconformities where CA is not implemented adequately during the subsequent recertification audit shall be escalated to the next higher NC rating (e.g., a minor NC will be escalated to a Major NC). CBs and their auditors must exercise caution when assessing repeat nonconformities as they must be the exact same deviation to be assigned as repeat NCs. For example, a hose on the floor at room A during the previous audit was issued a minor NC and the auditor again found a hose on the floor during the current audit and was in room B. Hence, this cannot be considered as a repeat as the NC is not exactly the same. If many such similar deviations are noted, then the auditor may assess a nonconformity against the management commitment requirement of the standard. The nonconformity rating must be decided

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by the auditor and CB depending on the risk of such deviations to the products and the BAP scheme.

4.8 Audit Reporting

The auditor shall provide a full report of the audit. The auditor shall submit the report to the Technical Manager or committee of the CB.

The report **shall follow the format specified by Best Aquaculture Practices** and shall provide full details of the audit. The report shall be issued whether certification is granted or not, and in accordance with Best Aquaculture Practices guidelines. The applicant who commissioned the audit owns the Audit Report, however, an agreement shall be in place between the applicant and the CB for the authorization of the provision of a report to Best Aquaculture Practices.

The details/comments section of the Audit Report shall be in open text format and in English. Reports shall also include comments both where criteria have been met, and not met. Objective evidence to support both conformance and any non-conformances that have been identified shall be referenced within the report. Within the Audit Report there shall be a record of the duration of the audit and any reason for the lengthening or shortening of the duration from that of typical or expected audit duration.

Audit reports must clearly identify whether certification audits are unannounced.

The Audit Report must accurately reflect the findings of the auditor during the audit.

4.9 Corrective Action of Non-Conformities

All non-conformities for all facilities, standards and audit formats shall have facility corrective action responses and objective evidence submitted of effective correction and implementation. Such evidence is essential for the audit and Certification Body to verify that the applicant has properly closed out the non-conformance and that the Applicant meets the requirements of the Standard.

Verification may take the form of further on-site assessment or of objective evidence such as submitted paperwork including updated procedures, records, and photographs etc. The evidence must be assessed by a technically competent member or group within the Certification Body. Note, that statements of intent alone by the facility to correct a non-conformance do not qualify as objective evidence. For evidence to be acceptable, it must address the root cause of the non-conformity.


All evidence of corrective action must be returned, completed, and verified by the Certification Body within a timescale defined by BAP before certification can be awarded.

4.10 Technical Review of the Audit Results, and the Certification Decision Making Entity

The audit report, test result and corrective action evidence must be considered by a Certification Manager or Committee of the CB. Audit results must undergo a technical review prior to granting, suspending, withdrawing or renewing certification.

Certification decisions shall be made by a person, persons or committee that were not involved in the facility audit. The Certification Body and the decision-making process shall be impartial and free from any conflict of interest to include any commercial or financial pressures or gains.

The certification review/decision making group/team/committee shall be adequately staffed to ensure timely reviews and decision making. The committee make up shall be:

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- Minimum 2 persons;
- At least 1 at all times having experience and competence in the BAP scheme.

The review shall ensure:

- That reviewers are impartial and technically competent to understand the content of reports, corrective action evidence and test result. And that these data are accurately assessed to demonstrate satisfactory evidence of compliance with the scheme
- That all requirements of the standard have been fully covered, using any supporting notes made during the assessment by a suitably qualified auditor
- That the scope of the report covers the scope applied for by the client and that the report provides satisfactory evidence that all areas of the scope have been fully investigated
- That all areas of non-conformity have been identified, and effective corrective action has been taken to resolve these non-conformities including the addressing of root cause

The result of the certification decision will be either:

- Applicant meets the Standards
- Applicant fails to meet the Standards

4.11 Complaints, Appeals and Disputes


Complaints, appeals, and disputes brought before the Certification Body by facilities, Best Aquaculture Practices or other parties shall be addressed in accordance with the Certification Body procedure and in compliance with this section. The applicant has the right to appeal the certification decision of the Certification Body. The Certification Body shall have a documented appeals process in place that is publicly available, and ensure the facility has a copy of that policy upon request and/or in the event of a complaint. Appeals shall be made in writing within the time frame set by the CB. Actions taken and their effectiveness must be documented.

A full investigation shall be conducted, and a written response provided by Certification Body personnel and that are independent of the auditor and Certification decision maker(s). Appeals and complaints must be resolved within the time frame set by the CB. Actions taken and their effectiveness must be documented.

4.12 Certificate Content

The CB will issue certificates that shall conform to the following content requirements:

- Name and address of the facility
- Standard and version number to which the certificate applies
- Scope of certification, species and category (e.g., farm raised, wild caught or both for SPS)
- Audit dates
- Issuance date
- Certificate validity date (if different from issuance date)

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- Certificate expiration date
- Name of the Certification Body
- CB Certificate/certification number
- CB Logo
- Signatures of the authorized signatory
- GSA Program logos as applicable
- Facility Identification Number
- If the audit was “Announced” or “Unannounced” (as applicable)
- Enhanced Social Accountability audit (where applicable)
- Auditor APSCA number and the APSCA Firm number (as applicable)
- AB Logo and number (where applicable)
- Transfer of certification (where applicable)
- Any other information specified by GSA.

The Certificate is the property of the CB and the control and management of the status of a certificate shall be in place. Copies of certificates shall be provided to Best Aquaculture Practices for verification and consistency of content.

Certification shall not be awarded where any non-conformances requiring corrective action, remain outstanding.

Ongoing certification is maintained where there is substantive and demonstrable evidence that the Applicant remains in compliance with the criteria of the Standard in question.

When timescales, verification and/or corrective actions are not completed as required, suspension and/or withdrawal of facility certification may be implemented.

4.13 Certification Validity

For new facilities the certificate validity or expiration date shall be 12 consecutive calendar months from the date of the issue of certificate.


The recertification certificate validity or expiration date shall be 12 consecutive calendar months from the previous certificate validity or expiration date.

The CB acknowledges that the certification of a facility continues after a certificate is issued and during the period of time for which such certificate is in effect. Therefore, the CB is responsible for, including responding to, acting on or rectifying, any instances of non-conformity or non-compliance that may arise during such period of time.

4.14 Document Control and Document Registry

All records and documentation related to GSA Standard’s audits shall be retained by the CB for a minimum of **five** years. Internal documentation will also be included such as personnel and training records.

CBs shall ensure that their agreements with Applicants dictate that all documents in relation to the audit shall be made available to Best Aquaculture Practices upon request. The Certification Body shall have in place a document control procedure that ensure all documents and records related to the CBs BAP certification process and to the GSA Standards and procedures are up to date and

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that only current versions are in use and/or distributed to facilities, personnel, auditors, and Best Aquaculture Practices.

The CB shall maintain a document control registry that lists version numbers and/or issue dates. Making it clear which is the current, implemented version of all BAP scheme documents.

4.15 Changes in Certification Requirements

The CB shall give due notice of any changes it intends to make in its requirements for certification and that any time frames, where applicable, for adjustments to such changes are defined and reasonable.

5.0 Certification Body (CB) Performance Monitoring

5.1 CB Internal Monitoring

Certification Bodies shall have an internal audit program which includes internal audits of its Quality Management System (see 3.1.2) as well other systems, records, processes, staff and auditor competency programs, and all other aspects of the certification system to ensure compliance and consistency in the application of the GSA Standard(s). This internal monitoring program shall also include on site assessments, shadow and/or witness assessments of auditors in accordance with the scope of every type or category of assessment for which the CB is approved/accredited under the GSA Standard(s).

The internal audit frequency of the CB's systems shall be defined and shall occur, at minimum, annually. The CB shall also conduct internal monitoring of the effectiveness of auditor training and competency requirements and assessments as described under "auditor competency" and other parts of this document. Auditor assessments shall be conducted on an ongoing basis to include monitoring of the type and number of nonconformities, competence in evaluating objective evidence, the audit process, the proper application of the GSA Standard(s), auditor calibration, training, and knowledge, and so on. These reviews shall include review of documents, interviews, meetings, etc.


5.2 Best Aquaculture Practices Performance Monitoring

The credibility of the GSA Standard(s) is directly related to the competence, integrity and performance of the approved Certification Bodies and their auditors.

Therefore, Best Aquaculture Practices will monitor the performance of Certification Bodies (as per the CB Review Procedure) and their auditors to ensure that the Standards are being applied consistently, auditor and CB personnel competence are properly ensured, and that reports, and certification decisions are completed accurately and timely.

Performance monitoring shall include such key performance indicators for CB and auditor competency assessments and related steps as follows:

- The review of audit reports, test results and certificates for quality and consistency
- Review, upon request, of corrective action evidence accepted by the auditor and CB to close non-conformities
- The review of auditor competency records, training and onsite shadow and witness audit records
- Review of CB personnel competency and qualifications


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- Review of CB certification procedures and policies
- Accreditation Body findings
- Reports of suspensions of CBs under other accredited schemes
- Appearance of any certified facilities on a government detention list
- Observance of the number or nature of non-conformities issued
- Audit of the CB office and witness auditing of their auditors
- Other auditor competency assessments beyond document reviews and witness auditing described above, such as requirements for additional examinations (tests).
- Monitoring compliance with audit duration requirements
- Unannounced or short notice audits of facilities by Best Aquaculture Practices or their designees
- Traceability tests of BAP certified products in the marketplace
- Complaint's investigation
- Supplier feedback

The amount or frequency of the above actions, including CB office audits, auditor witness assessments, other listed CB and auditor competency assessments, and facility audits are applied by the BAP scheme based upon risk assessments. Risk assessments shall include criteria such as:

- The number of Certifications a CB issues
- The number of audits an auditor is conducting as well as the size and complexity of the assessments
- The results of findings from monitoring activities
- Unusual patterns in the number or nature of non-conformities issued
- Changes in personnel, Management or Ownership
- Changes in GSA Standards, Regulatory or global standard requirements.

Where, at the discretion of Best Aquaculture Practices, a Certification Body or their auditor performance does not comply with BAP requirements, the Certification Body or its auditor(s) may be sanctioned, suspended, or removed from the scheme.

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BEST AQUACULTURE PRACTICES CERTIFICATION BODY KPIS

Certification Body KPIS – New Facilities	
TASK	KPI (Calendar Days)
Decline facility audit assignment.	No more than 7 days from receipt of application from BAP.
Contact the facility to schedule the audit.	No more than 14 days from acceptance of assignment from BAP.
On the ground audit completed.	Within 90 days (3 months) from acceptance of assignment from BAP.
Date Metric Ton and NC Summary submitted to BAP via PORTal.	No more than 10 days from the day following the end of the audit.
Date all CARs are received from the facility.	No more than 35 days from the day following the end of the audit.
Date all NCs were closed out by auditor and CB.	No more than 7 days from date facility submitted CARs.
Date of Technical Review complete, final audit report submitted via PORTal, corrective action evidence and test results submitted, and certificate issued by CB.	No more than 60 days from the day following the end of the audit. If due to extenuating circumstances this may not be achieved (e.g. testing results have not been received) this may be extending upon BAP approval.

****All KPI data fields must be updated in PORTal prior to sending final audit report and certificate to BAP**

Certification Body KPIs – Recert Facilities	
TASK	KPI (Calendar Days)
Decline facility audit assignment.	No more than 7 days from receipt of initial allocation from BAP.
Contact the facility to schedule the audit.	No less than 120 days (4 months) from facility expiration date.
On the ground audit date scheduled with facility and date submitted to BAP via PORTal or Excel weekly report.*	No less than 90 days (3 months) from facility expiration date.
On the ground audit completed.	No less than 60 days from facility expiration date.
Date Metric Ton and NC Summary submitted to BAP via PORTal.	No more than 10 days from the day following the end of the audit.
Date all CARs are received from the facility.	No more than 35 days from the day following the end of the audit.
Date all NCs were closed out by auditor and CB.	No more than 7 days from date facility submitted CARs.
Date of Technical Review complete, final audit report submitted via PORTal, corrective action evidence and test results submitted, and certificate issued by CB	No more than 60 days from the day following the end of the audit. If due to extenuating circumstances this may not be achieved (e.g. testing results have not been received) this may be extending upon BAP approval.

*In the event the CB has not confirmed the audit date with the facility upon receiving the application from BAP, the CB will have 14 days to schedule and confirm the on the ground audit with the facility from the date of receiving the application from BAP.

**All KPI data fields must be updated in PORTal prior to sending final audit report and certificate to BAP

5.2.1 Complaints Investigation

In the event that Best Aquaculture Practices is made aware of any failure or potential failure by the CB to apply the principles and criteria of any of the GSA Standards during the conduct of an audit or otherwise, Best Aquaculture Practices will request a documented report of the reasons for the complaint. This report will be referred to the CB conducting the Certification.

Best Aquaculture Practices will require a full investigation of the report by the CB and, where applicable, the certified site and a response shall be submitted to Best Aquaculture Practices for consideration within 28 days. If the issues raised in the complaints are not addressed to the satisfaction of Best Aquaculture Practices, the CB will be sanctioned.

Best Aquaculture Practices may, at their discretion, suspend or revoke CB approval if in Best Aquaculture Practices' opinion, the CB fails to properly address matters raised or if the CB's actions may bring the Certification Scheme into disrepute.

For the avoidance of doubt the CB may not undertake any audits while the contract is suspended or following any termination.

Where a complaint is considered, at the discretion of Best Aquaculture Practices, to have been justified, the information relating to the complaint may be made available to the Certification Bodies Accreditation Body.

Best Aquaculture Practices will notify the person referring the issue of the outcome of the investigation.


5.2.2 Review of Audit Reports

Audit report formats are determined by Best Aquaculture Practices and only authorized versions are to be used. A sampling of reports will be monitored by Best Aquaculture Practices for completeness as part of the Best Aquaculture Practices' performance monitoring procedures. Best Aquaculture Practices takes no responsibility for the accuracy of the content and information, or omissions contained in each audit report, which are the responsibility of the Certification Body.

Where audit reports do not conform to the agreed standard, this will be discussed with the Certification Body responsible. Where BAP requests further information related to the content of a report, such as notes, records or evidence observed, this information shall be provided within 15 working days. If extra time is needed the CB is to notify Best Aquaculture Practices immediately as to the reason and time frame for completion. Approval of delay is at Best Aquaculture Practices discretion.

The CB shall at a minimum provide the below to BAP Office after Certification Decision as part of the audit pack as applicable to facility types

- NC Summary Report
- Final Audit Report
- Product Test Reports
- Effluent Test Reports
- Corrective Action Evidence and NC Closure Reports
- Certificate

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5.2.3 Sanctioning, Suspension, and Withdrawal

Certification Body performance monitoring by Best Aquaculture Practices is intended to help Certification Bodies ensure compliance with the requirements of the Standard(s) in order to protect the integrity of the scheme.

Wherever a Certification Body's performance at the discretion of Best Aquaculture Practices, falls short of a requirement this will be brought to their attention and may lead to suspension. Monitoring of CBs for compliance may result in shortfalls in, for example, areas such as adherence to time frames, auditor competency, confidentiality, or code of ethics breaches, CB personnel competency, improperly closed nonconformities, improperly trained auditors, and so forth.

The Certification Body shall submit a response to the deficiencies along with a corrective action plan to Best Aquaculture Practices describing steps taken or to be taken, and the time frames. The response and plan shall be provided within 15 working days of receipt of notification of Best Aquaculture Practices of the deficiency. Objective evidence of proper correction may be requested by Best Aquaculture Practices and must be provided promptly.

Repeated failures, a failure to co-operate in the investigation of an issue, failure to address an issue satisfactorily, potential breaches of ethics, confidentiality, or the terms of agreement between Best Aquaculture Practice sand the CB, or the occurrence of a significant failure which could bring the scheme into disrepute or other serious incidences as determined by Best Aquaculture Practices will result in the sanction, suspension, or withdrawal of a Certification Body.

For the avoidance of doubt the CB may not undertake any audits while the contract is suspended. The Certification Body's Accreditation Body will be notified of the suspension or withdrawal and the reasons.

6.0 Information Management and Security

6.1 Information Management


The CB must undertake to immediately notify Best Aquaculture Practices in writing:

- Of any breach of the Contract by the company; or
- Of any claim or threatened claim against the Company by any Applicant to which the Company has provided or is in the course of providing audit services;
- To maintain true and accurate records of each audit completed during the term of the Contract for a period of not less than 5 years from the date of such audit

To supply Best Aquaculture Practices with a copy of:

- Their Accreditation certificate or written evidence of their Accreditation;
- Any report
- Their records of all relevant training completed by the Auditors and their respective qualifications to undertake Audits; and
- The insurance policy taken and maintained in accordance with Clause 7.2 below;

The CB must agree to immediately notify Best Aquaculture Practices and, where applicable, to supply a copy of the relevant report when:

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- A certificate of an applicant is revoked;
- A certificate of an applicant is suspended;
- An applicant who has previously gained Certification to a Standard, fails to regain certified status after an audit and certification review;
- There are any changes that could affect the safety of products;
- There are significant changes in the management or ownership of the certified facility;
- There is a change in the management or ownership of the CB

6.2 Confidentiality of Information

During the period of CB approval and for a period of 3 years after termination of approval for any reason, each party shall:

- Keep all confidential information confidential;
- Not disclose the confidential information to any other person without the prior written consent of the other; and
- Not use the confidential information for any purpose except the performance of their obligations under the contract

7.0 Legal and Liability Management

7.1 Legal Challenge

In the event that the applicant becomes aware of the notification of an impending prosecution with respect to product safety or legality, they shall immediately make the CB aware of the situation.


The CB in turn shall take steps to assess the implications of the situation and take appropriate actions. If there is likelihood that the legal proceedings will lead to adverse publicity or government intervention, the CB will immediately inform Best Aquaculture Practices of the incident.

7.2 Liability Insurance

The CB shall ensure that appropriate liability insurance is in place. This insurance shall incorporate employer's liability, public and product liability and professional indemnity, errors and omissions. A copy of the relevant insurance certification must be submitted to Best Aquaculture Practices upon request.

It is the responsibility of the approved CB to ensure that the referenced insurance covers all activities, regardless of where performed, or whether carried out directly or subcontracted. Where CB's require subcontract auditors to carry their own insurance, it is the responsibility of the CB to inform them.

The CB must agree to indemnify and keep indemnified the GSA and Best Aquaculture Practices from and against any costs, claims, demands, liabilities, expenses, damages, or losses (including without limitation consequential losses and loss of profit, and all interest, penalties and reasonable legal and other professional costs and expenses) arising out of or in connection with BAP certification activities, including CB and/or auditor negligence, default or breach of the contract.

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