QP2A: APPLICATION AND AUDIT REQUIREMENT FOR THE BIM CQA PROCESSING STANDARD

Introduction

The BIM Certified Quality Aquaculture (CQA) Programme is a third party, independent and accredited Certification Programme owned by BIM and operated by the BIM Aquaculture Development unit.

The Programme main central document is the BIM CQA Processing Standard, separated into different modules, each one covering different areas of manufacturing process activity of a farmed fish processing plant. These modules are grouped as follows:

Scope:
Certified Quality Aquaculture Processing Standard

PART 1- Certified Quality Aquaculture; General Requirements.
This section of the Standard covers the manufacturing process from raw material intake through to final product dispatch and covers the assessment of the company, premises, operational systems and procedures. Part 1 covers the food safety, operational and quality criteria that are required to be in place and also the specific product criteria for both Finfish and Mussels.

Sub-Scopes:

Organic Processing

PART 1 A- Certified Quality Aquaculture; Additional Organic Requirements. This section of the Standard covers the organic manufacturing process from raw material intake through to final product dispatch and covers the assessment of the company's additional organic procedures and systems. Part 1A covers the additional organic requirements that are to be in place together with the general requirements in Part 1 in order to achieve organic certification.

Eco Processing

PART 1 B- Certified Quality Aquaculture; Additional Eco Requirements. This section of the Standard is aiming to assist the company to demonstrate and prove their commitment to environmental sustainable development during the manufacturing process. Part 1B covers the additional eco requirements that are to be in place together with the general requirements in Part 1 in order to achieve eco certification.

Certified Standard Scopes

Certified Quality Aquaculture Processing Standard. The company must be able to demonstrate compliance to the Part 1 of the Standard.

Certified Quality Aquaculture Processing Standard: Sub-Scope; Organic Processing. The company must be able to demonstrate compliance to the Part 1 and Part 1 A of the Standard.

Certified Quality Aquaculture Processing Standard: Sub-scope; Eco Processing The company must be able to demonstrate compliance to the Part 1 and Part 1 B of the Standard.

1. PURPOSE

This document describes the requirements necessary for Certification Bodies (CBs) to apply for and audit and certify Applicants to the BIM CQA Processing Standard components of the Programme. This document defines the method by which new / renewal applications for certification to the BIM CQA Programmes are carried out using the following Standard:

- Certified Quality Aquaculture (CQA) Processing Standard - Issue 1, June 2016.
  Sub-scopes:
- Organic Production
- Eco Production

2. SCOPE

This procedure covers applications and methodology for certification to the CQA Processing Standard as listed, including of audit, certification and notification of results to relevant parties.

3. METHOD

3.1 Enquiries and Applications

On receipt of an enquiry for certification to an approved certification body (CB), the CB Manager /Administrator will contact the Applicant directly to discuss full details of the audit including:

- The species part of the audit: Atlantic Salmon, Freshwater Salmonids and Mussels
- Scope: Quality, Sub-scopes: Organic and Eco
  The type of site:
- Processing, Packing, Distributor.
- Fees and audit time-frame.
- Audit Frequency.

The CB shall forward an Information Pack to the Applicant containing:

- Application form (that may be specific to Quality, Organic and/or Eco Sub-scopes)
- CB Regulations and Procedure about the BIM CQA Programme
- Up to date CQA Processing Standard.

Only applications received on the application form for the appropriate Scope and/or Sub-scope and accompanied with the appropriate application fee will be processed.

On receipt of an initial application, the CB will apply the next sequential membership number and the Applicant's details will be entered in the relevant database.

<u>Certified Quality Aquaculture Programme – Audit Requirements</u>

Those Applicants who wish to become a member of one of the Certified Quality Aquaculture Programmes are required to have an audit relevant to the Certified Quality Aquaculture Processing Standard.

<u>Certified Quality Aquaculture Organic Programme – Audit Requirements</u>

Those Applicants who wish to become a member of the Certified Quality Organic Programme are required to have an audit to both the relevant Certified Quality

Aquaculture Processing Standard and the relevant Certified Organic Processing Standard sub-scope.

Certified Quality Aquaculture Eco Programme – Audit Requirements

Those Applicants who wish to become a member of the Certified Quality Eco Programme are required to have an audit to both the relevant Certified Quality Aquaculture Processing Standard and the relevant Certified Eco Processing Standard sub-scope.

Audit Frequency:

Applicants applying for farm certification are required to have an **annual** inspection.

3.2 Arranging Audits

The CB will be responsible for conducting the pre-audit check by contacting the Applicant directly to determine readiness for initial audit and agreeing a mutually convenient date for the audit. The audit date shall be confirmed along with a Site Audit Schedule.

All audits arranged by the CB's Programme Manager/Administrator shall have been allocated to an experienced approved Assessor with relevant industry knowledge and expertise for the given scope and subscope of the CQA Processing Standard. The CB shall select the Assessor from its Approved Assessor List.

Written confirmation of the audit schedule shall be sent to the Applicant.

If the outcome of the pre-audit check is un-satisfactory the CB shall enter the information in the Applicant's file and the Applicant shall be contacted at an agreed time.

The CB shall forward an authorisation to conduct an audit to the nominated Assessor accompanied by the Applicant's Site Audit Schedule together with a copy of the Applicant's (renewal Applicants only) non-conformances from their last audit.

The CB's Assessor shall bring said authorisation (where applicable), Site Audit Schedule, copy of previous non-conformances (where applicable) and relevant Audit Report Form to the audit site.

3.3 Programme Standard

Each section of the Standard begins with a section title in bold text, followed by the specific clauses. The CB's Assessor shall ensure that the Applicant complies with these clauses in order to gain a Certificate of Approval.

Note: In all cases, legal requirements take precedence over any requirements of the Standard.

3.4 Audit Procedures

Audit of most types of operation are conducted in English and typically take 1 day. The length of the audit will have been determined by the CB's Programme Manager/ Administrator based on factors examined in the Application stage and resulting from input from both the Applicant and the selected Assessor. These factors will include:

- Product/Process
- Scope and subscope to be audited against (e.g. an Organic and Eco audit may require more time than a regular Quality audit)
- Company Size
- Production Area
- Employees
- Turnover
- Prior Company Knowledge

The CB shall ensure that the Audit covers the following areas:

- an opening meeting.
- a review of the documented and Quality/Organic/Environmental Management Systems.
- production facility inspection – to review practical implementation of the systems and interview personnel.
- review of production facility inspection- to verify and conduct further document checks.
- final review of findings - preparation for the closing meeting.
- a closing meeting.

The CB's Assessor shall:

- conduct the audit on the agreed date.
- verify that appropriate corrective action is taken to close off all non-conformances raised during the previous audit (where applicable).
- during the audit, record detailed notes of the Applicant's ability to comply with the Processing Standard, and should a clause not be met, the nature and significance of the non-conformance against the Standard.

There are **three** levels of non-conformity:

Critical *–Where there is a Critical failure to comply with a clause of the assessment to the degree of there being a risk to the integrity of the CQA Processing Programme.*

In this event the critical non-conformance shall be recorded and the Assessor shall inform the Quality Systems Manager and/or Chairperson of the relevant Committees/Boards. Immediate temporary suspension may ensue pending clarifications.

Major *- Where there is a substantial failure to meet the requirements of a statement of intent and any mandatory clause of the CQA Processing Standard but there is no immediate risk to the Integrity of the CQA Programme.*

Also, if a subsequent audit discloses that a specific minor non-conformance has not been closed out, this will be classified as a ***Majo****r non-conformance.*

The CB's Assessor will record the non-conformance and communicate the details to the relevant Programme Manager.

Minor*- Where absolute compliance to the CQA Processing Standard statement of intent and a mandatory clause is not fully met. As in the other cases, t*he CB's Assessor shall record the non-conformance.

At the closing meeting, the CB's Assessor shall present their findings and discuss any non-conformances that have been identified with the Client. The Applicant shall be asked to acknowledge the non-conformances and will be informed by the Assessor that they have 28 days to close out all non-conformances. A copy of the non-conformances shall be left with the Applicant's technical representative.

The CB's Programme Manager/Administrator shall send a follow-up letter to the Applicant detailing the non-conformances raised during the audit.

3.5 Non-conformance Follow-up

The Applicant is required to write to the CB's Programme Manager/Administrator to confirm that action has been taken with respect to all critical, major and minor non-conformances identified during the Audit date, within 28 days from the date of the audit closing meeting. Depending upon the nature of the non-conformance, either documentary evidence or a re-visit may be required to fully assess compliance, before a Certificate of Approval can be awarded by the certifying body.

The CB's Programme Manager/Administrator shall check the Applicant's file after 20 days from the Audit to evaluate the progress of the corrective actions and if necessary contact the Applicant to remind them of their obligation.

The CB's Programme Manager/Administrator is responsible for ensuring that the Assessor has received and reviewed the corrective actions from the Applicant before the Certification Committee Meeting.

Failure to respond with corrective actions within the specified 28 day period shall result in the Applicant being deferred from the programme. If the Applicant requests longer than 28 days to address corrective actions they should apply in writing. This request shall be presented to the Quality Systems Manager for approval. Approval or deferral is dependent on the quality of the request.

3.6 Preparation for Certification

Before presentation of the report for Certification, the CB's Programme Manager/Administrator shall carry out a review of the report ensuring that:

- The Assessor's notes are reviewed to fully substantiate the non-conformances raised in the final report and (if held in a separate note-book) are submitted to be kept on the Applicant's file;
- The Assessor's report of non-conformance is not recorded as a statement of corrective action or direction;
- There is evidence of corrective action timescales being agreed and authorised by Applicant and Assessor at the time of the inspection;
- All evidence of subsequent corrective action by the Applicant since the inspection is available, presentable and clearly identifiable.

The report shall be presented for consideration at the next Certification Committee Meeting which the Assessor may be required to attend to present the findings or to answer any questions in relation the audits. However, they will not form part of the certification decision-making process in relation to any of the audit reports.

Authority to conduct future audits will be by means of a schedule of audits approved by the CB's Programme Manager.

3.7 Sub-scope: Organic - Review of the CQA Audit Reports

The CB Certification Committee shall review the Applicant's audit report to determine the level of non-compliance against the CQA Farm Standard based on the catalogue of non-compliances, infringements and irregularities applying to the Organic Sector in Ireland, based on the provisions of the various EU regulations as well as national legislation.

Levels of non-compliances, infringements and irregularities and definitions:

Level 1 - Minor non-compliance: Does not directly compromise the integrity of the product but needs correcting

Level 2 - Intermediate non-compliance: May compromise the integrity of the product if not corrected, or may result from not correcting a previous minor non-compliance.

Level 3 - Irregularity or critical non-compliance: The integrity of the operation, product/batch or lot has been directly compromised or lost but can be recovered – Examples: By accidental use/substitution/contamination with prohibited materials.

- Non-compliant labelling
- Excessive number of non-compliances
- Contamination of GMOs

Level 4 – Manifest infringement (Severe infringements and infringements with prolonged effect: A serious and chronic failure of the system where the integrity of the organic production has been lost.
Examples:

- Deliberate fraudulent activities such as substitution of non-organic ingredients, marketing non organic produce as organic.
- Contamination by prohibited materials through systems failure
- The repeated failure to correct previously identified non-compliances
- Livestock health & welfare seriously compromised
- Deliberate use of GMOs

Actions, Sanctions and Timescales

The Certification Body shall also be compliant with the Actions, Sanctions and Timescales detailed in the DAFM Catalogue of Infringements, Republic of Ireland (Version 6B July 2018)[1].

3.8 Certification Outcome

The outcome of the review of audit reports shall result in one of the following outcomes:

- The issue of a notice of Certification of Approval and confirmation of future audit frequency.

- Deferral of Certification pending verification of outstanding corrective actions to be taken by the Applicant.

- Suspension. Refusal to issue or withdrawal of a Certificate of Approval until a full re-audit has been carried out following completion of an agreed corrective action programme by the Applicant.

Issue of Certificate

[1] See http://www.irishorganicassociation.ie/wp-content/uploads/Catalogue-of-Infringements-Version-6B-July-2018.pdf

The Certificate remains the property of Certification Body and is issued subject to the Applicant complying with the CB's Programme Regulations and the requirements of the relevant Standard.

In the event that there are substantial changes to the premises, products or personnel, these must be notified in writing to the CB. The documented submission will then be reviewed at the next relevant Certification Meeting. The Certificate of Approval may be withdrawn in the event that changes occur which will affect the Applicant's ability to meet the relevant Standard.

Surveillance Audits

Certified Applicants are required to re-apply each year to the Programme and are then treated as new Applicants. Certified Applicants who do not re-apply shall have their Certificates withdrawn on the basis of Voluntary Withdrawal and will be required to desist from making any claims or statements with reference to their status under Certification by the CB.

The review of continuing audit reports by the CB will result in the maintenance or withdrawal of certification with notification of non-compliances, proposed corrective actions and changes to audit frequency advised to the Applicant. Records/Minutes of the Certification meetings shall clearly record the Certification Decision following consideration of each report submitted.

3.9 Notification of Results

All decisions on certification status will be advised in writing by the CB's Programme Manager/Administrator to the respective Applicants within ten working days of the Certification Decision. In the case of deferral the communication will include notification of any non-compliance requiring additional evidence of corrective action. A copy of this correspondence will be held in the Client's file.

3.10 EU Organic Farming Logo

Certified Applicants wishing to use the EU Organic Logo which is associated with these programmes must direct all enquiries to the relevant CB Programme Manager/ Administrator. The Control of Marks procedure shall be followed, accordingly.

Certified Applicants using the EU Organic Logo who withdraw from the Organic Programme will be required to desist from making any claims or statements with reference to their Organic status under Certification by the CB.

4. Records

The CB Programme Manager/Administrator shall review the Applicant's file 30 days after the relevant Certification Committee meeting to ensure that all records, minutes and Certificates are in place.

The Client's file will be reviewed according to an internal review programme scheduled and conducted by the CB's Internal Auditor.

AMENDMENT LOG

DATE	ISSUE	AMENDMENT	AMENDED BY
July 2020	1.2	Update of Organic Catalogue of Infringements	Vera Flynn