



# **Best Seafood Practices Responsible Fishing Vessel Standard**


## **Vessel Group Program Policy and Control Document**

Issue 1.0


October 12, 2021

## Contents

<b>Section A – Overview</b> .....	4
1.0 – Definitions .....	4
2.0 – Introduction .....	4
2.1 GSA .....	4
2.2 BSP .....	5
2.3 RFVS .....	5
<b>Section B – Group Program Summary</b> .....	5
1.0 - Group Program Summary .....	5
2.0 - RFVS Group Formation .....	6
2.1 Introduction .....	6
2.2 Full Group Application Process (Option 1) .....	6
2.3 Subgroup Application Process (Option 2) .....	8
2.4 Addition of Vessels to a CERTIFIED Group .....	9
2.5 Removal of Vessels from a CERTIFIED Group .....	9
3.0 - Annual Surveillance Audit Procedure .....	9
<b>Section C – Group Participant Requirements</b> .....	11
1.0 - Group Structure and Eligibility Requirements .....	11
1.1 Overview .....	11
1.2 Structure and Authority .....	12
1.3 Contracts or Written Agreements: .....	12
1.4 Registry .....	13
1.5 Number of Member Vessel Per Group, and Their Proximity .....	13
1.6 Adding and Removing Member Vessel .....	14
1.7 Scope of Group Certification – (No Exemptions): .....	14
1.8 Organizational Chart/Document .....	14
1.9 Language Requirements (Non-English-Speaking Group Applicants) .....	15
2.0 - Group Central Management System (CMS), Related Components, and Effectiveness .....	15
2.1 CMS Development and Effective Implementation: .....	15
2.2 CMS Update and Review: .....	15
2.3 Management Commitment, Provision of Resources, and Management Review .....	15
2.4 Quality Manual .....	16

	Vessel Group Program Policy and Control Document	Issue Number 1.0	Effective Date 12-October-2021
Group Program Integrity	Status Active - External	Page 2 of 21	

<b>2.5 Personnel</b> .....	16
2.6 Document Control – General Documents Requirements.....	18
2.7 Document Control .....	18
2.8 Record Keeping .....	19
<b>2.9 Complaint Handling</b> .....	19
<b>3.0 - The Group’s Internal Audits</b> .....	19
<b>3.1 Internal Central Management System (CMS) and Related Systems Audits</b> .....	19
<b>3.2 Internal CMS and Related Systems Audits – Non-Conformities, Corrective Actions, and Suspension</b> .....	19
<b>3.3 Internal Member Vessel Audits</b> .....	20
<b>3.4 Group Sanctions or Suspensions Against Member Vessel</b> .....	20
<b>3.5 Internal Vessel Audits – Decision Making and Impartiality</b> .....	21
<b>3.6 Records of Internal Audits</b> .....	21

	Vessel Group Program Policy and Control Document	Issue Number 1.0	Effective Date 12-October-2021
Group Program Integrity	Status Active - External	Page 3 of 21	

# Section A – Overview

## 1.0 – Definitions

**Group** - A collection of commercial fishing vessels organized for the sake of a collective certification process, that have implemented a shared Central Management System (CMS) by way of legal contract, ownership, or written agreement and which appoints a Vessel Group Manager (VGM) to manage the certification process of the Group. A group may be comprised of vessels under a single ownership structure or may be comprised of multiple owners, as long as all member vessels adhere to the same legal contracts or written agreements. Groups are not limited by size, tonnage, target species, gear, flag state, or distance from each other (provided that the distances do not present a barrier to effective management and enforcement of the requirements of the program).

**Sponsor** - A legally recognized entity that is authorized to enter into agreements and make commitments on behalf of the associated vessels. Examples of sponsors include processing plants, importers or buyers, fishing cooperatives or associations, or fishing companies that own and manage their own fleet of fishing vessels. Sponsors must have sufficient resources and management commitment to manage all member vessels and are expected to take an active role in assuring that RFVS requirements for the certification process are applied to all vessels in the sponsored group.

**Central Management System (CMS)** - Centrally controlled and maintained document system, adopted and signed by senior members of Group management to ensure common and coordinated management of all member vessels. The CMS must maintain both clear communication with all member vessels, as well as a written and demonstrable ability to enforce necessary rules.

**Vessel Group Manager (VGM)** - An individual responsible for overseeing and executing the responsibilities of the CMS for all Group vessels. VGM will manage the certification process on behalf of the applicant Group and is responsible for enforcing rules and ensuring all member vessels are in compliance with the requirements of the RFVS.

**Group Internal Auditor** - Any individuals appointed by the VGM or Group’s senior management to conduct internal audits of the CMS and RFVS criteria against that of the Group and individual member vessels. Group Internal Auditors must be properly trained against all CMS policies and procedures and RFVS criteria. They must also be able to identify and assign non-conformities against the CMS and member vessels, as well as properly assess if assigned non-conformities are resolved prior to external audits.


**Certification Bodies (CBs)** - Organizations that provide auditing and certification services. Only BSP-authorized CBs may conduct audits for vessel groups seeking BSP certification.

**Auditors** - The person(s) appointed by the CB to perform the group audits. CBs may only use RFVS-approved auditors to perform RFVS audits.

## 2.0 – Introduction

### 2.1 GSA

Global Seafood Alliance (GSA) is an international, non-profit (501c 6) corporation registered in Delaware, USA with principal offices based in Portsmouth, New Hampshire. GSA seeks to provide comprehensive and credible seafood supply-chain assurances while addressing gaps in seafood certification. These assurances will flow from third-party certification programs to ensure seafood supply chains meet strict environmental, social and food safety standards.

	Vessel Group Program Policy and Control Document	Issue Number 1.0	Effective Date 12-October-2021
Group Program Integrity	Status Active - External	Page 4 of 21	

## 2.2 BSP

The GSA Best Seafood Practices program provides assurances to the marketplace that wild seafood has been harvested and processed in an ethical manner with respect for the wellbeing and security of all employees across the supply chain.

## 2.3 RFVS

The Responsible Fishing Vessel Standard (RFVS) is a voluntary, vessel-based program certifying high standards of operational practices relating to crew safety and welfare on board fishing vessels. The RFVS is an assurance tool to help fishing vessel owners and operators showcase industry-agreed best practices through independent, third-party auditing. The RFVS is applicable to all types of commercially licensed fishing vessels and shall be applicable globally, subject to them meeting the scope and eligibility criteria detailed in the standard.

# Section B – Group Program Summary


## 1.0 - Group Program Summary

The BSP group program is designed to accommodate fleets or self-organized groups of commercial fishing vessels, regardless of size, fishing methods, target species, and fishing location, that can meet the eligibility and operational requirements for Group certification. The requirements for Groups (as outlined in this document) entail establishment of an effective Group entity and strict operational and managerial controls at both the group and individual vessel level.

The Group management controls must be robust enough to instill a high degree of confidence during each phase of the audit so that compliance to all BSP requirements has been well established. Significant shortcomings during the certification audit, whether at Group management or member vessel level in any phase of the audit will raise non-conformities against the entire Group applicant. This shall result in the Group applicant being withheld from certification, and possibly suspended, unless all issues are corrected in accordance with the rules of the program.

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

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

	Vessel Group Program Policy and Control Document	Issue Number 1.0	Effective Date 12-October-2021
Group Program Integrity	Status Active - External	Page 5 of 21	

## 2.0 - RFVS Group Formation

### 2.1 Introduction

The group certification model allows for multiple vessels operating under a single Central Management System (CMS) to be certified to the RFVS program based on a subsample assessment approach without the need for all vessels to have external third-party audits by an approved Certification Body (CB).

There are two pathway options to reach an RFVS Group certification:

- Option 1- Full Group Application Process (2.2)
- Option 2- Subgroup Application Process (2.3)

### 2.2 Full Group Application Process (Option 1)

All vessels within a Group Application under a CMS have been internally assessed to the RFVS criteria and any non-conformances closed off, **prior** to any external assessment by an approved RFVS CB.

On acceptance by BSP, the application will be submitted to an approved CB who will contact the applicant to ascertain how many external assessments will be required to complete the certification.

To conduct a group certification, the CB will be required to undertake an assessment of the CMS to assess the detail and quality of all the internal controls of how the applicant manages the vessels allowed to participate within the group and to conduct quality assurance checks of all the internal vessels assessments conducted against the RFVS Criteria. In addition, the CB shall be required to undertake a sample of on-vessel assessments to the RFVS criteria.


**The vessel sample size shall be based on the Square Root of the number of vessels in the Group rounded up to the nearest number. The minimum sample size is 2 vessels.** Additional vessels can be added (or subtracted) to this sample by the CB depending on the nature of the group and its composition based on risk (see sections 2.4 and 2.5).

#### 2.2.1 Vessel Sample Size Risk Assessment

The addition or subtraction of external audits (Risk Loading) conducted by the CB shall be determined based on criteria in Table 1.

*Table 1. Risk assessment for the addition or subtraction of external audits. Risk Loading refers to the number of vessels to be added or subtracted to the Square Root sample size as described in section 2.0*

Ownership Status	Diversity of Operations	Countries of Registration	Risk Rating	Risk Loading
No vessels in multiple ownership	Single Sector	Single Nationality	Low Risk	-1
Some vessels in multiple ownership	Single Sector	Single Nationality	Medium Risk	0
No vessels in multiple ownership	Multiple Sectors	Single Nationality	Medium Risk	0
No vessels in multiple ownership	Multiple Sectors	Multiple Nations	High Risk	+1
Some vessels in multiple ownership	Multiple Sectors	Multiple Nations	Very High Risk	+2

	Vessel Group Program Policy and Control Document	Issue Number 1.0	Effective Date 12-October-2021
Group Program Integrity	Status Active - External	Page 6 of 21	

The on-vessel assessment calculation, CMS assessment to be completed, plus all associated audit costs to conduct this work will form part of the Application’s audit plan and quotation. Once compiled this audit plan and associated costings will be submitted by the CB to BSP, who shall confirm with the Applicant in advance of any audits taking place.

The maximum number of vessels within a group under this option **shall not exceed 50 vessels**.

**2.2.2 Vessel Sample Selection Expansion**

To ensure that the CB has confidence that the applicant’s CMS and internal auditing process are working correctly the CB may expand the number of vessels audited within the group based on the following risk factors:

- The rate of the number of non-conformities in the external audit sample
- The rate that non-conformances relating to the same Core Principle occur across the external audit sample, suggesting systemic failure of the CMS.

Criteria for the addition of vessels for external audits under 2.2 are provided in Table 2.

Table 1. Criteria for addition of vessels to external audit sample based on rate of non-conformities and systemic QMS failures observed in initial sample.

		NON-CONFORMANCE OCCURRENCE RATE (Percentage of reported non-conformances across each audit in sample group)			
		No NCs in sample audit group	Less than 50% of audit sample group have more than 3 NC’s	51>74% of audit sample group have more than 3 NC’s	More than 75% of audit sample group have more than 3 NC’s
RATE OF SYSTEMIC FAILURE (Percentage of non-conformances relating to the same Core Principle across sample audit group)	80%-100%	NO ADDITIONAL AUDITS	50% ADDITIONAL AUDITS (AUDITOR DISCRETION TO DOWNGRADE)	50% ADDITIONAL AUDITS	75% ADDITIONAL AUDITS
	60%-79%	NO ADDITIONAL AUDITS	25% ADDITIONAL AUDITS	50% ADDITIONAL AUDITS (AUDITOR DISCRETION TO DOWNGRADE)	50% ADDITIONAL AUDITS
	40%-59%	NO ADDITIONAL AUDITS	25% ADDITIONAL AUDITS (AUDITOR DISCRETION TO DOWNGRADE)	25% ENHANCEMENT RATE	50% ADDITIONAL AUDITS (AUDITOR DISCRETION TO DOWNGRADE)
	20%-39%	NO ADDITIONAL AUDITS	NO ADDITIONAL AUDITS	25% ENHANCEMENT RATE (AUDITOR DISCRETION TO DOWNGRADE)	25% ADDITIONAL AUDITS
	<20%	NO ADDITIONAL AUDITS	NO ADDITIONAL AUDITS	NO ADDITIONAL AUDITS	25% ADDITIONAL AUDITS (AUDITOR DISCRETION TO DOWNGRADE)

## 2.3 Subgroup Application Process (Option 2)

The RFVS Subgroup model approach allows for the addition of Subgroups to a Group over the initial 3-year period of certification. This approach is intended to be suited for large groups in excess of 50 vessels that may take up to 2-3 years to prepare in stages for RFVS certification. The sub-group methodology is also intended to ensure strict adherence to the CMS procedures and RFVS criteria even when managing large numbers of vessels under a single Group entity.

### 2.3.1 Initial Subgroup Certification

An initial group of vessels shall apply and be assessed to the RFVS program under an overarching group CMS as described in section 2.0. This group of vessels will be known as the **first subgroup group** (Subgroup 1) on this applicant's certificate. The CB will conduct the CMS audit and use the square root sampling plus the risk assessment to audit a selection of the vessels, as they would for a group applicant under the Option 1 approach (section 2.2). Once certified, the initial applicant can then start work with another group of vessels within their fleet to get them up to the required RFVS requirements under the same overarching CMS and VGM structure that was used for Subgroup 1.


### 2.3.2 Additional Subgroup Certification

Once a second (additional) subgroup is prepared to apply into the Group certification, the CB will **not be required to conduct a full CMS audit** but **shall assess internal audits** for this second sub-group of vessels. Additionally, the CB shall conduct external audits on a 10% sample selection of vessels comprising of the second subgroup (Table 3). Upon successful assessments, Subgroup 2 shall be added to applicant's certificate. This step-by-step onboarding of the fleet into the RFVS program will continue with more subgroups of vessels being added until the entire fleet is certified to the RFVS program.

This subgroup onboarding mechanism **must be completed within the initial 3-year certification cycle of the Applicant's RFVS certificate. The maximum number of vessels** within each subgroup **shall not exceed 50 vessels**

Table 2: Example Subgroup Application process to RFVS certification.

External Sampling audits = 10% of all new additions				
Total Fleet Vessels= 214				
Sub-Group Number	Sub-Group Vessel Total	Cumulative Total	Sample Selection Total	Calculated Number of Required On-Vessel Audits
1	45	45	Square Root Plus Risk Assessment	7 Plus 0 (If Group is Medium Risk)
2	50	95	10%	5
3	30	125	10%	3
4	50	175	10%	5
5	39	214	10%	4

	Vessel Group Program Policy and Control Document	Issue Number 1.0	Effective Date 12-October-2021
Group Program Integrity	Status Active - External	Page 8 of 21	



## 2.4 Addition of Vessels to a CERTIFIED Group

Once an entire group has been certified using either Option 1 or 2, additional individual vessels can be added to the certificate provided under the following conditions:

- a) All internal RFVS criteria assessments/inspections for these new vessels shall need to be completed.
- b) Any non-conformances assessed during internal assessments must be closed off prior to them being added to the group.
- c) All new vessels shall need to complete the self-declaration form to show compliance with the RFVS Eligibility Criteria.
- d) The CB certificating the original group shall be informed within 10 working days of submission to allow the CB to review the new vessels internal assessments and approve them before their names are added to the Applicant's Certificate
- e) The CB shall inform BSP to add details to the BSP website.
- f) The CB at the Applicant's annual surveillance shall be onsite regardless or risk rating of initial certification and prioritise these new vessels for sampling and shall conduct a detailed review of their internal assessments as part of the CMS annual audit.
- g) The number of new vessels added to a group certification **shall in any one year of the Applicant's certificate be limited to 10% of the total group size by number.**

## 2.5 Removal of Vessels from a CERTIFIED Group

Once an entire group has been certified using either Option 1 or 2, individual member vessels can be removed from the certificate under the following conditions:

- a) If a vessel fails to comply with the RFVS criteria or Eligibility Criteria following either an internal assessment/inspection or following an external CB assessment, the vessel in question shall be given a period of 90 calendar days to close out these non-compliances. If the vessel fails to comply the Applicant will remove them from their group and inform their CB within 10 working days.
- b) The CB shall remove the vessel name from the Applicant's certificate.
- c) The CB shall inform BSP to amend the details on the BSP website.

## 3.0 - Annual Surveillance Audit Procedure

In addition to the requirements for Group formation, addition, and subtraction, certified Groups will also be subject to annual surveillance audits per the requirements of the RFVS. Annual surveillance audits are intended to measure compliance with requirements that may not be attainable at the time of certification (the supplementary clauses), RFVS criteria deemed critical to crew safety and welfare, and any non-conformances assessed at the time of the initial audit.

Surveillance audits are conducted annually and shall be scheduled so as to align as closely as possible with the date of initial certification. Similar to the initial audit structure, a sub-set of member vessels will be selected annually for surveillance audits. This is determined based on a two-part risk assessment calculation, which also provides guidance on the acceptability of remote vs. onsite audits for surveillance. The surveillance audit sample size will not exceed the Square Root of the total Group size, rounded up, unless the assigned CB determines additional audits are necessary to ensure Group compliance. Criteria for surveillance audit vessel selection is presented below in Tables 4-7:


	Vessel Group Program Policy and Control Document	Issue Number 1.0	Effective Date 12-October-2021
Group Program Integrity	Status Active - External	Page 9 of 21	

Table 4: Country/Region-Based Surveillance Risk Assessment

Risk Criteria	Risk Score Calculation			
US State Department Trafficking in Persons (TIP)	Tier 3 = +20 points	Tier 2 Watchlist = +15 points	Tier 2 = +10 points	Tier 3 = +0 points
Country is on Department of Labor List of goods made with significant incidences of know labor violations for the following categories (fish, tilapia, shellfish, shrimp and Nile Perch)	Yes = +20		No = +0	
Country is ranked on the Corruption Perception Index (CPI) below a score of 41	Yes = +15		No = +0	
3 in 1000 or more of the country population (within which the vessel is registered to operate) are in modern slavery (Global Slavery Index)	Yes = +15		No = +0	
<b>Overall Risk Category</b>	<b>Low: Sum ≤ 20</b>	<b>Medium: 20 &lt; Sum &lt; 45</b>	<b>High: Sum ≥ 45</b>	

Table 5: Initial Audit-Based Surveillance Risk Assessment

Risk Level	Number of Non-Conformances Assessed at Initial Audit		
High	3 or more majors	10 or more minors	2 majors and 7-9 minors
Medium	1-2 majors	5-9 minors	1 major and 7-9 minors
Low	0 majors	<5 minors	N/A

Table 6: Final Determination for Annual Surveillance Assessment Category

Country/Region-Based Risk Rating	Initial Audit-Based Risk Rating	Final Surveillance Risk Rating
Low	Low	Low
Low	Medium	Low
Low	High	Medium
Medium	Low	Low
Medium	Medium	Medium
Medium	High	High
High	Low	Medium
High	Medium	High
High	High	High

Table 7: Group Surveillance Audit Action Plan Summary

Surveillance Risk Rating	Surveillance Sample Size	Remote Surveillance Audit Allowance <sup>1</sup>
Low	60% of Square Root Calculation	Always
Medium	75% of Square Root Calculation	Every other year
High	100% of Square Root Calculation	Never

<sup>1</sup>Member vessels or the Group VGM may request onsite surveillance audits in lieu of remote at any point if that is their preference. When onsite surveillance audits are required, there is no option to require remote auditing.

## Section C – Group Participant Requirements

### 1.0 - Group Structure and Eligibility Requirements

#### 1.1 Overview

- 1.1.1 There shall be a designated Group entity authorized to apply for certification on behalf of the Group and its members. The sponsor as a legal entity shall also have the authority to represent and oversee the Group. This entity can be a company, association, co-op etc., as long as it has the authority to exercise control over the Group members and ensure compliance with all elements of the RFVS criteria.


## 1.2 Structure and Authority

- 1.2.1 Participating Vessel shall be members of a registered entity (Group)
- 1.2.2 The Group may be comprised of independently owned, directly owned, or sub-contracted vessels and include one or more vessels operated by a group member company. The Group as a whole shall have in place all of the elements described throughout this document.
- 1.2.3 All Vessels shall use a common written language that is understood by the vessel operators, OR, if translations are required, such documents and communications must accurately reflect the content of those of the written language. The approval, issue and control of translated documents is the responsibility of group entity management, including the VGM.
- 1.2.4 The Group entity shall have authority over every vessel as a condition of their membership and by way of legal contract, ownership or written agreement. Such agreements must allow group management to audit vessels, enforce rules and impose sanctions that may be required to protect the operational integrity of the group against the requirements of the RFVS criteria.
- 1.2.5 The Group entity shall appoint a Vessel Group Manager (VGM) and provide the VGM with adequate authority and resources (e.g., internal auditors) to assist in all aspects of the management and compliance of the RFVS Group members and documentary systems.
- 1.2.6 The VGM shall have the authority to enforce all RFVS criteria and Group Program requirements on behalf of the Group and over each member. This includes the power to add or remove vessels from the group through the procedures of the RFVS.

## 1.3 Contracts or Written Agreements:

The Group entity shall have in place the following contracts or written agreements between the Group entity and every member of the Group if the vessels are not directly owned by the Group entity. These contracts or written agreements shall meet the following provisions:

- 1.3.1 At minimum the agreements must provide:
  - a) The vessel's name
  - b) Name of the owner, contact information, postal address, telephone and fax number, email address
  - c) The vessel's home port
  - d) The vessel's government registration or identification number
  - e) A legal contract or written agreement to adhere to the requirement of the RFVS Program, including documentary and record keeping requirements
  - f) A legal contract or written agreement to cooperate with the VGM and group management
  - g) Permit access to vessels for the purpose of internal audits by the Group and external audits by an authorized CB
  - h) The timely provision of corrective action and acceptance that Group management have the right to impose sanctions if any vessels within the group are not meeting the requirements of the RFVS criteria
  - i) The contract or written agreement shall be signed and dated by both parties

	Vessel Group Program Policy and Control Document	Issue Number 1.0	Effective Date 12-October-2021
Group Program Integrity	Status Active - External	Page 12 of 21	

- 1.3.1.1 For vessels that are directly owned by the Group Entity, the requirement for a written contract or agreement shall not be required, if the Group Entity can provide evidence to meet the requirements of clause 1.3.1

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

- 1.3.2 All vessels shall agree to the following provisions, which shall also be contained in the contract or written agreement between the Group entity and the individual member Vessel:

- a) All Vessels shall agree to be listed
- b) All Vessels shall agree to provide access for audits by the Group’s Internal Auditors, RFVS management, the CB, and the CB’s auditor
- c) Allow the CB’s auditor and RFVS to make unannounced audits
- d) Agreement between the Group entity and Group members that the CB and BSP will be immediately informed in the case of any additions of members to the group, or suspensions or removals of members

- 1.3.2.1 For vessels that are directly owned by the Group Entity, the requirement for a written contract or agreement shall not be required, if the Group Entity can demonstrate it has control of these vessel operations to meet the requirements of clause 1.3.2.

#### 1.4 Registry


- 1.4.1 A registry shall be maintained of all member vessels of the Group, including all requisite details. The registry shall be maintained and kept up-to-date and shall be supplied to BSP during the application for certification or recertification. (The Auditor is to include with the audit report a copy of the current list of members and the structure of the Group at the time of the audit).

- 1.4.2 The registry shall include, for each member vessel, the following information at minimum:

- a) Vessel name
- b) Vessel owner, contact information, postal address, telephone/fax number, email address
- c) Species caught
- d) Home Port
- e) Vessel government registration or identification number
- f) Vessel size and fishing methods
- g) Average trip duration
- h) All related permits or licenses
- i) Crew Size (if it changes, the maximum number of crew onboard over previous 12 months)
- j) Crew contract format (share fisher, wage fisher, or combination)

#### 1.5 Number of Member Vessel Per Group, and Their Proximity

- 1.5.1 The minimum number of members in a single Group is 4.
- 1.5.2 The maximum number of members in a single group (Option 1) or subgroup (Option 2) is 50 at initial certification, but in exceptional cases may be higher, assuming that a careful risk assessment has been completed and has been approved in writing by BSP.

	Vessel Group Program Policy and Control Document	Issue Number 1.0	Effective Date 12-October-2021
Group Program Integrity	Status Active - External	Page 13 of 21	

## 1.6 Adding and Removing Member Vessel


- 1.6.1 The VGM shall be authorized to manage the process of adding and removing members from the Group and updating the Registry of approved vessels.
- 1.6.2 The Group's initial Certification Body shall be informed of any changes to the vessel membership of the group within 10 working days of the change.
- 1.6.3 Adding: Initial Certification: additional members shall not be added to the Group once the Group application has been submitted to BSP. After initial certification groups may add up to 10% of their size each year throughout the duration of the certificate.
- 1.6.4 The internal member vessel audits shall be scheduled in such a way as to ensure completion of at least one internal audit before allowing the vessel to be part of the group applying for certification. All deficiencies identified shall be resolved prior to the group's scheduled CB CMS audit (Phase II).
- 1.6.4.1 The internal audit must be sent to the CB for verification before the new member can be added to the certificate.
- 1.6.5 There shall be clearly documented procedures for the addition of new members to the group.
- 1.6.6 Member vessels can, and shall, be removed at any time if they show themselves unable or unwilling to comply with the CMS and RFVS requirements, and the contractual (or written agreement) provisions of the Group. The CB and BSP shall be informed immediately by sending an updated registry, details of removed vessels, and the reason for the removal (See "Sanctions and Suspensions" later in this document for further details).
- 1.6.7 Escalation Process for Member Vessels: There shall be clearly documented procedure for disciplining and/or removing members from the Group. This procedure must be published to vessel operators and shall clearly set out the escalation process and at what point the member may be removed from the Group. This shall take into consideration, situations such as but not limited to, the member:
- Not responding to, or cooperating with, the Group entity, VGM or his/her designee, or the internal Auditor(s) on any issue
  - Not providing the information requested in a timely fashion
  - Not cooperating with the need to have an internal or external audit, and/or continually delaying the process
  - Not providing corrective action evidence within the agreed timeframe.
  - Has a trend of excessive non-conformities at either the internal or external (CB audit)
  - Identification of critical human rights issues at sea

## 1.7 Scope of Group Certification – (No Exemptions):

- 1.7.1 RFVS Group Certification shall apply to all catch landed by the Group and its members, and no portion of the Group vessels are exempt from inspection.

## 1.8 Organizational Chart/Document

- 1.8.1 The Applicant shall have in place an organizational chart or document that defines:
- 1.8.1.1 The relationship between the Group entity and each of the vessels (wholly owned, partially owned, sub-contracted, independently owned, etc.).

	Vessel Group Program Policy and Control Document	Issue Number 1.0	Effective Date 12-October-2021
Group Program Integrity	Status Active - External	Page 14 of 21	

1.8.1.2 The organizational, management and reporting structures within the Group, including CMS control hierarchy, shall be defined. At minimum, the organizational structure shall describe the following:

- a) Who is responsible for the overall management of the Group, including Group policies, the structure, content of the CMS, and procedures for appointing staff
- b) Who is responsible for the approval and issue of controlled documents
- c) Who is responsible for management review of the CMS
- d) Who is responsible for managing the internal inspection program, the review of inspection reports and vessel approval
- e) Who is appointed as the internal Auditor(s)
- f) Who has the authority to sanction or suspend vessels from the group
- g) Who has responsibility for communications with the membership, the Certification Body and BSP

1.8.2 There shall be a brief description of the key responsibilities and authorities of the positions described above in ensuring compliance with all Group and RFVS requirements.

**1.9 Language Requirements (Non-English-Speaking Group Applicants)**

1.9.1 The Group entity shall have at least one person on staff with the ability to translate the documents required at Phase I into English and send them in a timely fashion to the CB auditor, in the event that the auditor is English-speaking only. (This person shall also be available to translate any additional documents into English if requested by BSP or the CB).

1.9.2 In the event the VGM does not speak English, the Group shall have at least one person on staff capable of communicating in English (verbally or in writing) with BSP or the CB on their behalf. (In order to enable the VGM to ask or answer questions on behalf of the Group with BSP, or with English speaking CBs or auditors).

**2.0 - Group Central Management System (CMS), Related Components, and Effectiveness**

**2.1 CMS Development and Effective Implementation:**


The Group entity shall develop and implement a Central Management System (CMS) at the Group management that ensures each vessel within the group shall be in compliance with the requirements of the RFVS criteria.

**2.2 CMS Update and Review:**

The Applicant’s senior management shall review all components of the CMS, such as but not limited to the Group contracts or written agreements, procedures, Quality Manual, Documentary Control and records, Group CMS and individual member vessel internal audit reports, corrective actions, policies for adding, removing and sanctions, etc., to ensure its continuing effectiveness in complying with all elements of the Group rules, Group Program requirements and Standard. This review shall take place at a minimum, annually.

**2.3 Management Commitment, Provision of Resources, and Management Review**

2.3.1 Senior management from the Group entity and Group members shall take the responsibility to ensure the establishment, implementation, and maintenance of the management systems that provide effective internal controls for all activities required for conformity and continuous

	Vessel Group Program Policy and Control Document	Issue Number 1.0	Effective Date 12-October-2021
Group Program Integrity	Status Active - External	Page 15 of 21	

improvement with all elements of the RFVS. It is the senior management's responsibility to ensure that a VGM is in place at all times. If the VGM becomes unavailable at any time without notice, the group must appoint a new VGM within 90 days.


- 2.3.2 Management commitment shall also be demonstrated through the timely provision of all resources needed to effectively implement, comply with, and improve upon all elements of the Group's policies, CMS, and RFVS requirements. This includes ensuring adequate personnel and their training.
- 2.3.3 The Applicant's senior management shall review all components of the CMS, such as but not limited to the Group contracts or written agreements, procedures, Quality Manual, Documentary Control and records, Group CMS and individual member vessel internal audit reports, corrective actions, policies for adding, removing and sanctions, etc., to ensure its continuing effectiveness in complying with all elements of the Group rules, Group Program requirements and Standard. This review shall take place at a minimum, annually.
- 2.3.4 A detailed record of the management review shall be maintained. Deficiencies in any systems or Group member compliance, revisions to procedures or records, corrective actions, time frames and follow up actions, shall be clearly documented.

**2.4 Quality Manual**

- 2.4.1 The set of written policies and procedures that address the Group's adheres to all sections of the RFVS shall be referred to as the "Quality Manual." The Applicant shall have an appropriate Quality Manual which incorporates policies and procedures that address how to control compliance with the RFVS.
  - 2.4.1.1 The Quality Manual may include all components or may reference separate, related documents within it.
  - 2.4.1.2 The Quality Manual shall be readily available to those personnel who will need to refer to its contents.
- 2.4.2 Within the Quality Manual, there shall be a clearly documented Quality Policy Statement signed by the group entity's senior management lead that commits the group to compliance with all elements of the RFVS requirements.
- 2.4.3 The Quality Manual shall describe how the RFVS criteria, and certification process requirements, are communicated to the member vessel, and how changes in requirements are implemented at the Group entity and member vessel levels.
- 2.4.4 The Quality Manual shall be available in the predominant language of the member Vessel's crew.

**2.5 Personnel**


- 2.5.1 Vessel Group Manager (VGM) Qualifications, Training, and Functions:
  - 2.5.1.1 The VGM shall meet the qualifications and training requirements described below:
    - 2.5.1.1.1 Have a post-high school degree or diploma in a subject related to fisheries, and, 2 years of practical experience in Fishing Vessels. Where there is no relevant degree, experience is acceptable in lieu of a degree providing it is a minimum of 3 years at a supervisory level.

	Vessel Group Program Policy and Control Document	Issue Number 1.0	Effective Date 12-October-2021
Group Program Integrity	Status Active - External	Page 16 of 21	



- 2.5.1.1.2 Shall demonstrate in-depth knowledge and understanding of the RFVS requirements.
- 2.5.1.1.3 Have the ability to manage, oversee, enforce, and train Group members and internal Auditors/auditors regarding the RFVS requirements.
- 2.5.1.1.4 Should observe an RFVS Auditor training course or provide a signed document that they have read and fully understand the key documents to the RFVS program e.g., Compliance Guide, checklists standard document group policy.
- 2.5.1.1.5 Have good communication and organizational skills.
- 2.5.1.2 The VGM shall have sufficient staff appointed, as necessary, to carry out all aspects of the proper management and compliance of the Group. This includes the appointment of enough qualified Internal Auditors to conduct the internal audits properly and timely to the requirements of the RFVS.
- 2.5.1.3 The VGM, or their designees, shall have the support, authority and resources to manage all aspects including, but not limited to, the below elements, described in detail later in this document:
  - 2.5.1.3.1 Ensure proper development and implementation all components of the Group Central Management Systems (CMS).
  - 2.5.1.3.2 If the VGM is responsible for developing or modifying any, or all, of the documentary components of the CMS system, the Group entity shall appoint another qualified person other than the VGM to conduct the internal audits of the CMS required under 3.1. Conversely, where the VGM conducts the CMS internal audits, the Group entity shall appoint another qualified person(s) to develop and modify the CMS, including all of its components.
  - 2.5.1.3.3 Manage and have the authority over additions and removals of Group member vessels, and of imposing sanctions or suspensions of its members. Shall communicate and coordinate with, (or appoint a qualified designee), the BSP approved Certification Body and with BSP.
- 2.5.2 The Group's Internal Member Site Auditor(s) (Qualification and Training)
  - 2.5.2.1 The Group shall clearly name the person or persons who, irrespective of other duties, will perform the Group's Internal Vessel Audits.
  - 2.5.2.2 The Internal Auditor(s) shall meet the qualifications and training requirements described below:
    - 2.5.2.2.1 Evidence confirming the qualifications of Internal Auditors (employed or contracted) together with evidence that there is a plan or commitment in place to refresh or renew qualifications in accordance with awarding body requirements.

*Additional Note: Individuals successfully attaining qualifications as recognized by the International Register of Certificated Auditors (IRCA) will be suitable qualified to act as internal Auditors for RFVS group assessments*

	Vessel Group Program Policy and Control Document	Issue Number 1.0	Effective Date 12-October-2021
Group Program Integrity	Status Active - External	Page 17 of 21	

- 2.5.2.2.2 Have a minimum of 2 years of in-depth experience in fishing operations.
- 2.5.2.2.3 Have good communication and writing skills and the ability to write an internal audit report.
- 2.5.2.2.4 Have studied the applicable RFVS criteria and compliance guide requirements. After study, shall have undergone sufficient training by the VGM to ensure proper knowledge is demonstrated.
- 2.5.2.2.5 Have undergone assessment training on how to conduct an internal vessel audit to the RFVS standard by the VGM.
- 2.5.2.2.6 Have done at least 2 vessel internal audits under the supervision of the VGM before being approved as an Internal Auditor. Approval is contingent upon proper performance of the audits. Further supervised audits shall be conducted until proficiency is demonstrated.
- 2.5.2.3 A list of the Group’s internal auditors shall be maintained and kept up to date. Both the CBs and BSP shall be provided with an updated list of Internal Auditors whenever there is a change.
- 2.5.2.4 There shall be a strict policy that prohibits an Internal Auditor from auditing any vessel they have worked on within 2 years, they have a commercial interest in, or are operated by members of their immediate family.

2.5.3 Training


- 2.5.3.1 The VGM and Internal Auditors shall have received proper training as outlined under “Personnel” above. This training shall be documented. Vessel member staff responsible for implementation of the Group Program and RFVS requirements, shall have received adequate training from the VGM or VGM’s staff. Training records for all persons involved with the administration of the CMS shall be available for the CB external audit.

2.6 Document Control – General Documents Requirements

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

2.7 Document Control

- 2.7.1 Written document control procedures shall be in place either within the Quality Manual or referenced within the Quality Manual used to implement the CMS. A designated person or persons shall be appointed by the Group management to maintain Document Control.
- 2.7.2 All controlled documents and all documents relating to the administration of the CMS shall have a unique identifier which includes issue number and date with appropriate page sequence numbers.
- 2.7.3 Documents (i.e., procedures, manuals, policies) shall be retained for a minimum of 3 years.
- 2.7.4 Document Control Procedures will include control of all policies, procedures, manuals, R\records and data critical to the management of the CMS, and Quality Manual.

	Vessel Group Program Policy and Control Document	Issue Number 1.0	Effective Date 12-October-2021
Group Program Integrity	Status Active - External	Page 18 of 21	

2.7.5 A current version of the applicable RFVS Criteria shall be kept aboard all member vessels and be available for reference purposes at all times.

**2.8 Record Keeping**

2.8.1 The Applicant shall maintain records, documents and procedures to demonstrate the effective control of the CMS as well as performance against RFVS requirements.

2.8.2 Records (i.e., forms, checklists, monitoring and training records, etc.) shall be retained for a minimum of 3 years.

2.8.3 All records and other documentation shall not show evidence of falsification.

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

**2.9 Complaint Handling**

2.9.1 The Applicant shall prepare and implement an effective system for the management of complaints received from customers of any of the Group’s members. Complaints shall be documented.

2.9.2 The Complaint Handling Procedure shall state how complaints are investigated and what follow-up was performed, including records of any corrective actions taken to resolve the complaint.

**3.0 - The Group’s Internal Audits**

**3.1 Internal Central Management System (CMS) and Related Systems Audits**


3.1.1 The Central Management System and related components shall be audited by the VGM (or his/her designated Internal Auditors or Group entity appointee if the CMS was developed or modified by the VGM) at least once annually. The purpose is to test the overall effectiveness and implementation of the CMS system and related components as required by the RFVS Group Program and the RFVS. The audit results shall be provided to all of the management personnel associated with the Group in order to ensure all non-conformities are corrected in a timely fashion, and in all cases prior to the external CB audit.

3.1.2 The Internal CMS audit shall be conducted using the RFVS Group CMS Audit Checklist or Self-Assessment. (The relevant sections being what is referred to for the CB external audit purposes as Phase I and Phase II.)

3.1.3 The above annual CMS audit shall be completed, along with the management review, PRIOR TO the CB External audit, and this information made available to the CB auditor and BSP upon request.

**3.2 Internal CMS and Related Systems Audits – Non-Conformities, Corrective Actions, and Suspension**

3.2.1 Where any non-conformity is assessed during the internal CMS audit of the Group’s CMS and related systems, the VGM and Group entity shall ensure proper and immediate corrective action is implemented.

	Vessel Group Program Policy and Control Document	Issue Number 1.0	Effective Date 12-October-2021
Group Program Integrity	Status Active - External	Page 19 of 21	


- 3.2.1.1 Corrective actions on all non-conformities assessed during the internal CMS audit must be corrected, with the root caused identified and addressed to prevent future recurrence, before the authorized CB is able to schedule the external audit with the VGM.
- 3.2.1.2 Proper evidence or documentation is required to be submitted as part of corrective actions related to the internal CMS audit.

**3.3 Internal Member Vessel Audits**

- 3.3.1 There shall be an annual plan and schedule for the internal audits of all member Vessels in the Group to cover all the requirements of the RFVS.
  - 3.3.1.1 The annual plan shall document the current status of each vessel to meeting the requirements of the RFVS and shall highlight any remedial action plans in place to close off any detected non conformances.
  - 3.3.1.2 The annual plan shall incorporate dates as to when each internal vessel audit is completed or is scheduled.
  - 3.3.1.3 A copy of all internal vessel audit reports shall be retained for a minimum period of 3 years.
- 3.3.2 All vessels within the group shall be internally audited and any non-conformities to the RFVS criteria closed off before the scheduling of the CB’s initial certification audits.
- 3.3.3 The Internal Auditor shall use the authorized audit RFVS checklist for the internal audits of the member Vessels. (This is the same checklist used for the CB External audit).
- 3.3.4 A written summary of non-conformities found during the internal audit will be left with the vessel and sent to the VGM. Non-conformities from the internal audit report will be reviewed to determine root causes of issues on vessels and what action plans shall be required for a vessel where non-conformances to the RFVS criteria are identified.
  - 3.3.4.1 The VGM or Internal Auditor shall, no later than 10 days after the internal audit, liaise directly with the vessel owner/ or skipper/captain to agree on the required action plan to close out the non-conformities. When non-conformities arise from an internal audit after Group certification, vessels shall have 90 days to close out all non-conformities from when the internal audit takes place or shall be suspended for up to 1-year from the Group.

**3.4 Group Sanctions or Suspensions Against Member Vessel**

- 3.4.1 Any Critical non-conformities found during an internal audit of a vessel shall result in IMMEDIATE suspension by the VGM of the vessel from the Fishing Fleet.
  - 3.4.1.1 When a critical non-conformity is found, the VGM shall immediately undertake an investigation to determine if the incidence is isolated, or if it may also exist at one or more other member vessels. Where it is found to affect other member vessels, they too, shall be IMMEDIATELY suspended.
  - 3.4.1.2 The vessel(s) shall undertake corrective action as described in an action plan to close off the non-conformity within 90 calendar days of the vessel suspension notification.

	Vessel Group Program Policy and Control Document	Issue Number 1.0	Effective Date 12-October-2021
Group Program Integrity	Status Active - External	Page 20 of 21	

- 3.4.1.3 If the non-conformity is not closed off with the 90 calendar days the vessel shall be removed from the group and shall not be allowed to regain membership back into the group for a minimum period of 12 months.
- 3.4.1.4 Any vessel suspended or returning to the group shall be subject to a further internal audit to the criteria of the RFVS and have no outstanding non-conformities before it is accepted back.
- 3.4.2 All other non-conformities identified as non-critical within the internal audit report shall need to be closed off to time scales agreed with the vessel's action plan. For Groups that have already received initial certification, this action plan must require non-conformities to be closed off in less than 90 days or shall be suspended from the Group for up to 1 year.
  - 3.4.2.1 Any vessel that does not close off these non-conformities within the specified time period shall be suspended from the group and given a further 30 days to comply.
  - 3.4.2.2 After this 30-day period, if the non-conformity is still outstanding the VGM will remove the vessel from the group and inform the CB and BSP.


**3.5 Internal Vessel Audits – Decision Making and Impartiality**

- 3.5.1 There shall be a documented policy in place prohibiting an internal auditor from auditing a vessel they have worked on as a fisher within 2 years, they have a commercial interest in or are operated by members of their immediate family.

**3.6 Records of Internal Audits**

All of the following records shall be maintained as part of the records of the Group by the VGM, for review by the CB or BSP upon request:

- 3.6.1 Internal Auditor name, experience and qualifications list;
- 3.6.2 Internal Audit reports for each vessel, including the internal auditor name;
- 3.6.3 Records maintained for Vessel Action Plans, closeouts of any non-conformance, including evidence, and vessel suspensions

	Vessel Group Program Policy and Control Document	Issue Number 1.0	Effective Date 12-October-2021
Group Program Integrity	Status Active - External	Page 21 of 21	