

# **Guidance for Seafood Processing Standard (SPS) Issue 5.1 – 16 – November – 2020**

## **Section 2.9 Outsourcing & Specifications – Processes and Services – **Clause 2.9.5****

## 1.0 Purpose

This document provides guidance for Facilities and Certification Body (CB) Auditors to the Global Seafood Alliance Seafood Processing Standard (SPS) 5.1., section 2.9 **Outsourcing & Specifications – Processes and Services** – clause 2.9.5. This guidance is specific for seafood processing facilities seeking SPS certification or recertification, herein referred to as the Primary Facility, that engage in outsourcing of shrimp pre-processing activities such as sorting, peeling and/or de-heading to external pre-processing entities to complete a portion of their production process.

**SPS 5.1 clause 2.9.5:** The facility shall not purchase or outsource the peeling and de-heading of shrimp to informal entities known as “peeling or de-heading sheds”. To be eligible for SPS certification, peeling and/or de-heading of shrimp shall only occur in establishments with valid government approvals and with legal, food safety, environmental and social criteria in place which shall be subject to audits as stated in 2.9.2. Such establishments are either,

i) owned by the applicant facility.

OR

ii) completely controlled by the applicant facility with valid agreements in place.

OR

iii) must be located onsite or in close proximity to the applicant facility and included as part of the scope of the annual SPS audit.

(Note: This prohibition cited above does not include processed shrimp that are sourced from a legally approved processing plant subject to controls in clause 2.10.1 or shrimp originating from fishing vessels in compliance with clause 2.8.1.3).


(Note: Peeling or de-heading sheds are defined as independent, third-party “satellite” seasonal operation that engage in peeling or heading of shrimp, often temporarily, during peak harvest times without formal government approval and lack controls on legal, food safety, environmental and social processes).

## 2.0 Guidance

After an extensive study of peeling / de-heading sheds, this Guidance to 2.9.5 has been issued to expand the definition and audit requirements under SPS 5.1 for “peeling or de-heading sheds” to include more broadly any kind of “pre-processing unit” to reflect the full range of activities that might occur:

(Note: Peeling or de-heading sheds, or preprocessing units are defined as independent, first, second, or third-party “satellite” seasonal operation that engage in peeling or heading of shrimp, often temporarily, during peak harvest times, with or without formal government approval and controls on legal, food safety, environmental and social processes).

GSA has concluded that any pre-processing units being used by the SPS certified or applicant facility MUST

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be audited either i) in conjunction with the applicant/SPS certified facility's annual third-party CB audit as part of SPS certification, or ii) by applying for SPS certification independently as a primary processing facility. Option ii) may be desired for RENTED/OUTSOURCED pre-processors utilized by multiple BAP certified facilities. Internal audits will not be accepted as the sole means of demonstrating compliance with the requirements of the SPS.


The information about any pre-processing units being utilized must be provided to GSA-BAP at the application stage, and will be forwarded to the assigned CB. If such information is not provided or is inaccurately represented, the applicant facility may not be allowed to participate in the GSA-BAP program, or if already certified the facility may be subject to suspension from the program. GSA-BAP does not allow any unregistered, illegal and unapproved pre-processing units to be used by the applicant/SPS certified facility.

During the application stage, facilities that utilize such pre-processing units per 2.9.5 i) or ii) must provide for **each** unit the following and submit documentation where applicable.

1. If the pre-processing unit is OWNED by the applicant (either located within the applicant/SPS certified facility, or within the same compound/premises, or at a separate location external to the applicant/SPS certified facility).
  - a. Valid government permits (e.g., MPEDA/EIA approvals in India) for the construction, operation and environmental approval (release of effluent and disposal of solid waste) of the pre-processing unit.
  - b. Layout drawing/map of the pre-processing unit.
  - c. Location map (including GPS coordinates) of the pre-processing unit and distance from the applicant/SPS certified facility.
  - d. Number of employees at the pre-processing unit, including documentation showing approval from the labor department for the number of employees to be employed at the pre-processing unit.
  - e. Description of the activities conducted at the pre-processing unit (e.g., peeling, sorting, grading, de-heading).
  - f. Mode and responsibility of transportation of product between supplying farms and the pre-processing unit and the applicant/SPS certified facility.
  - g. Ownership of product while at the pre-processing unit.
  
2. If the pre-processing unit is RENTED/OUTSOURCED per 2.9.5 ii) above.
  - a. Copies of contracts/agreements between the pre-processing unit and the applicant/SPS certified facility.
  - b. All of the above in point 1 (a-g).

During the audit, CB auditors must verify all the above information and audit the pre-processing unit to the full scope of SPS with due attention to legal, food safety environmental and social requirements of the SPS. The auditors must also pay attention to the raw material source & receipt, pre-processing activities and chain of custody of the raw material and the BAP star claims that the applicant/SPS certified facility is making. If the auditor discovers that information regarding pre-processing unit/activities was not provided or was inaccurately represented, the applicant facility may not be allowed to participate in the GSA-BAP program, or if already certified the facility may be subject to suspension from the program.

The detailed objective evidence collected by the CB auditors during the audit of the pre-processing units must be reported under clause 2.9.5 in the comments section.

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