Seafood Processing Standard

Issue 6.0 – Public Comment Draft

DD-MONTH-YEAR (Effective Date)

Global Seafood Alliance Certification Standard

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Contents

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A Summary Key Changes from Issue 5.1 to 6.0

- The structure of the standard has been reformatted to include a core requirement for all processing plants. Separate modules have been created to accommodate production processes that extend beyond the core requirements. Any modules within a facility's scope will be assessed as part of the SPS audit. (All Sections)
- Edited the text of the clauses for clarity of language (All Sections)
- Removed duplicate clauses (All Sections where applicable)
- Structured clauses to improve auditability (All Clauses where applicable)
- Added additional regulatory requirements to section C1
- Added clause requirements to include elements of food safety culture to section C2
- Updated standard to include new GFSI V2020.1 requirements
- New guidance has been written for 6.0
- Traceability requirements have been revised to improve efficiency of the audit (section 8.0)
- Environmental verification parameters have been revised C3
- The water testing requirements have been modified (Section 3.11)
- The social accountability and employee health requirements have been augmented to reflect the most recent best practices. (Sections 5 and 6)
- Added clarification and guidance on laboratory testing (Section 4.5)
- Employee training requirements have been consolidated (Section 6.5.1)
- Effluent Values required for facilities discharging into natural bodies of water have been revised
- Dissolved Oxygen values for Effluent samples have been changed from an optional data point to a required monitoring point.
- Requirements on finished product testing have been revised to be based on risk
- Development of Vanguard Enhanced Social Standards as an add-on module to allow facilities to achieve an exceptional Social and Ethical rating through certification recognition.

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B Introduction

Founded in 1997, the Global Seafood Alliance (GSA) is an international non-governmental organization dedicated to advocacy, education, and leadership in responsible aquaculture. GSA engages stakeholders worldwide who are dedicated to advancing environmentally and socially responsible aquaculture practices.

Through the development of the Best Aquaculture Practices (BAP) and Best Seafood Practices (BSP)certification standards, GSA has become the leading standards-setting organization for seafood (www.globalseafood.org, www.bapcertification.org: and https://bspcertification.org

Background to the Standard and Standard Scope

This document is the Seafood Processing Standard (SPS) Core – Issue 6.0 and is to be audited jointly with various SPS Modules based on the scope of processing facilities applying for certification. The Standard and its modules replace the Best Aquaculture Practices (BAP) Seafood Processing Standard – Issue 5.1. The full scope of the Seafood Processing Standard 6.0 includes:

- Food Safety Management and Related Requirements (Core C1-C4)
- Effluent Management Requirements, No Discharge (Core C1),
- Water Quality Testing Requirements (Core C3)
- Social Responsibility Requirements (Core C5-C6)
- Environmental Management Requirements (Core C7)
- Traceability Requirements (Core C8)
- Glossary
- Animal Welfare Module
- Effluent Discharge Module
- Finished Product Testing Module
- Outsourcing Module
- Program Identity Preservation (Logo Use) Module
- Remote Wild Caught Environmental Module
- Enhanced Social Standard (voluntary Vanguard Standard add-on)

Facilities shall be assessed to all SPS Core clauses, plus all SPS modules that fall within the scope of the seafood processing production that is undertaken at that facility. Compliance with all elements (full scope) is required for certification, unless preauthorized by GSA. Facilities may also elect to be assessed and certified to the ESS when, or after, applying for SPS Issue 6.0 Certification. Please see the Enhanced Social Standard for additional information.

The objective of the Food Safety Management and Related Requirements of the Seafood Processing Standard is to specify the food safety and quality criteria required to be in place within a seafood manufacturing or processing organization to achieve certification to the SPS. The format and content of the Standard is designed to allow an assessment of a Company's premises and operational systems and procedures by a competent third-party Certification Body.

The Seafood Processing Standard covers nearly all aquaculture and wild-caught species as follows:

- Finfish
- Crustaceans
- Mollusks
- Echinoderms
- Medusozoans
- Frogs
- Seaweed

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The scope of operations covered under this standard includes only those processes that are performed in land-based facilities and operated by the facility.

Acknowledgements

An expert group (Processing Technical Standards Committee) developed and endorsed the Standard, with representatives throughout the supply chain and interested parties including industry associations, processors, producers, regulators, non-governmental organizations and conformity assessment and standards experts.

GSA is grateful to the members of the Processing Technical Standards Committee who created the original Seafood Processing Standard and to the other specialists that provided valuable input during the review process:

Francisco Aldon, Marin Trust
Ashley Apel, Conservation International
Syamsul Arifin, Global Seafood Alliance
Dr. B.Q. Viviana Cachicas, Sección Microbiología de Alimentos, Instituto de Salud Pública de Chile
Kim Gaudett, Cooke Aquaculture Inc.
Joe Hebert, Trident Seafoods
Birgitte Krogh-Poulson, Independent Social Accountability and Labor Rights Expert
Margaret Malkoski, National Fisheries Institute
Rachel Matheson, Independent Gender and Labor Rights Expert
Benjamin Plesic, US Foods
Hart Schwarzenbach, Peter Pan Seafoods
Pamela Wharton, Independent Labor Rights Consultant
Jennifer Wiper, Cooke Aquaculture Inc.
Scott E. Zimmerman, Safe Quality Seafood Associates (SQSA), LLC
Guy Ewing, Independent GSA Consultant
Ken Corpron, GSA Program Integrity Analyst
Michael Platt, GSA SPS 6.0 Committee Chair
Allison Roderick, GSA Program Integrity Specialist
Chris Weeks, GSA Director of Program Integrity

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Normative Documents

This Standard will be regularly reviewed to ensure its relevance with legislation and market requirements. The normative documents from which the initial standard (or subsequent versions as noted) were drawn upon were/are:

- Abolition of Forced Labour Convention, 1957 (No. 105)
- Acidified Foods 21 CFR 114
- ADFO Cured, Salted, and Smoked Fish Establishments Good Manufacturing Practices
- Best Available Techniques in fish processing Industry, Nordic Perspective
- Best Available Techniques (BAT) Reference Document for the Food, Drink, and Milk Industry: Industrial Emissions Directive 2010/75/EU Integrated Pollution Prevention and Control (2019)
- BRCGS Ethical Trade and Responsible Sourcing Issue 2
- Code of Hygienic Practice for Aseptically Processed and Low Acid Foods CAC/RCP 40-1993
- Discrimination (Employment and Occupation) Convention, 1958 (No. 111)
- Eight fundamental ILO conventions on which the Social Component of the SPS Standard is based.
- Equal Remuneration Convention, 1951 (No. 100)
- ESSA – European Guide to Good Practice for smoked and /or Salted and or Marinated Fish
- Ethical Trading Initiative 01 April 2014
- FDA Seafood HACCP Regulation, 21CFR 123 and GMP's 117
- Forced Labour Convention, 1930 (No. 29)
- Freedom of Association and Protection of the Right to Organize Convention, 1948 (No. 87)
- Global Food Safety Initiative Guidance Document – V2020
- ISO 9001:2015
- ISO 19011:2018
- ISO 17021-1:2015
- ISO/IEC 17065:2012
- Minimum Age Convention, 1973 (No. 138)
- NSSP Model Shellfish Codes for molluscan products.
- PAS 1550:2017 Exercising due diligence in establishing the legal origin of seafood products and marine ingredients- Importing and processing – Code of practice
- Ready-To-Eat Seafood Pathogen Control Guidance Manual (*Listeria monocytogenes and Salmonella spp.)* Ready to Eat Working Group of the National Fisheries Institute-March 2019
- Right to Organize and Collective Bargaining Convention, 1949 (No. 98)
- Sedex Members Ethical Trade Audit (SMETA) Measurement Criteria Version 2.0 April 2017
- SSCI Benchmarking Requirements Version 1.1 A1: Part II Processing Manufacturing scope
- SSCI Benchmarking Requirements Version 1.0 Part I
- Thermally processed low-acid foods packaged in hermetically sealed containers 21 CFR 113.
- USFDA Fish and Fishery Products Hazards and Controls Guidance Fourth Edition – March 2020
- Worst Forms of Child Labour Convention, 1999 (No. 182)

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Program Management

The Global Seafood Alliance is the Program Manager for the Seafood Processing Standard (SPS). Companies who wish to be certified against the Seafood Processing Standard must apply online via the Certification Portal available at www.bapcertification.org, (select "Certification Portal" and follow the on screen directions to create an account and apply).

Currently certified facilities must re-apply to renew their certification annually through the certification portal.

Mailing Address: 85 New Hampshire Avenue, Suite 200, Portsmouth, New Hampshire 03801 USA
Main Office Telephone: +1-603-317-5000
For questions regarding applications: certification@globalseafood.org
Website: www.globalseafood.org/
www.bapcertification.org
www.bspcertification.org

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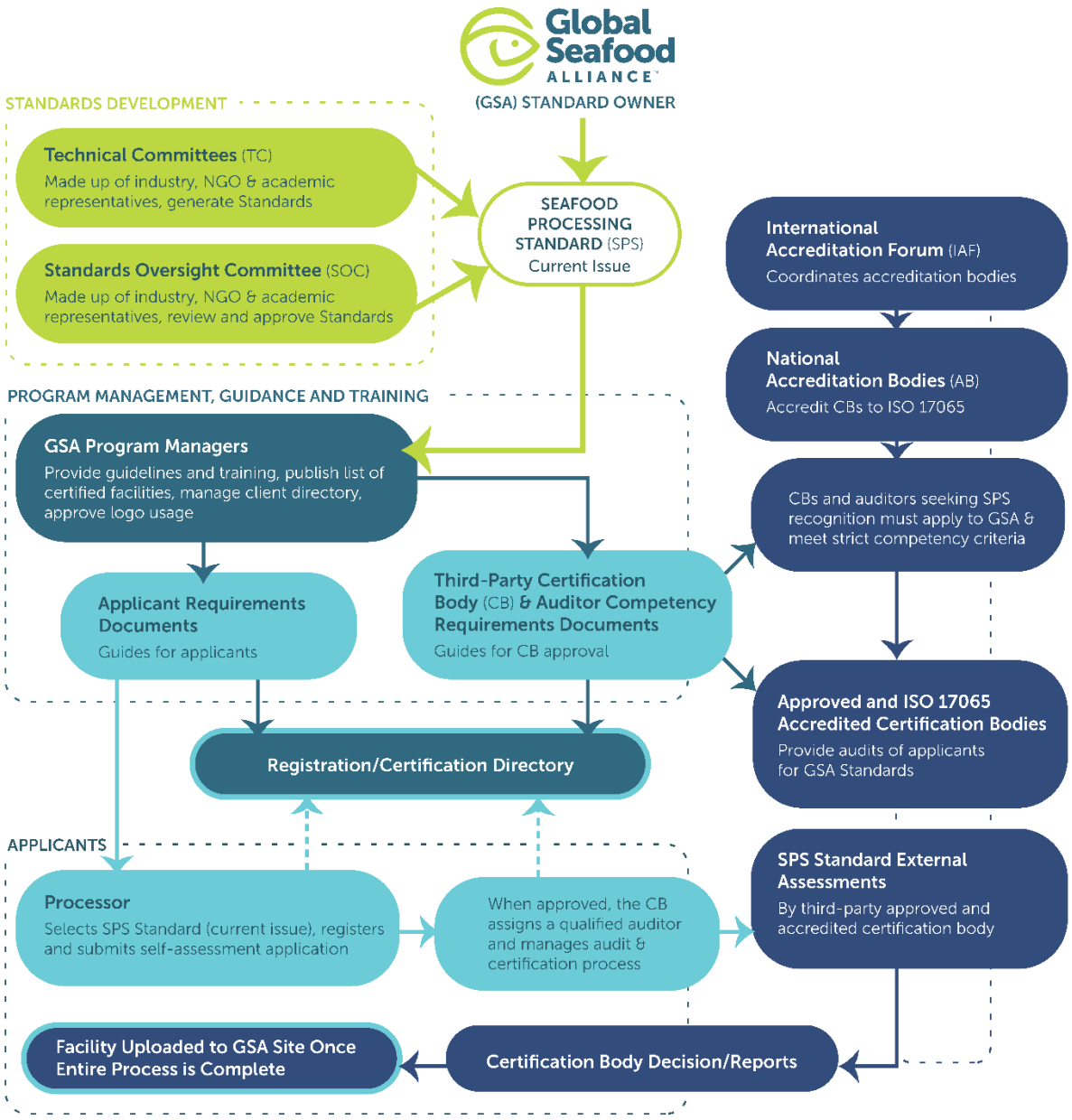
SPS Development and Certification Process



Assessments

New applicants are advised to carry out a self-assessment against the standard to ascertain their readiness for a third-party Certification Body (CB) audit. Applicants are to rectify any deficiencies identified as part of their self-assessment, prior to the third-party CB audit.

Once an applicant's self-assessment has been carried out and is satisfied that all deficiencies identified have been corrected, the company can proceed to Certification.

To become certified, Applicants must be able to demonstrate compliance with this Standard, through an independent third-party on-site assessment by a GSA Approved CB.

The CB must be approved by GSA and be accredited to ISO/IEC 17065:2012 (Conformity assessment — Requirements for bodies certifying products, processes, and services) by an Accreditation Body who is a Member of the International Accreditation Forum and a signatory to the Multilateral Recognition Agreement.

The chosen Certification Body will formulate an agreement between the Applicant and the Certification Body detailing the requirements and commitments needed from the Applicant.

The GSA will maintain a list of approved Certification Bodies.

Facilities that are newly built or pre-existing facilities that an entity is moving the production operation into must ensure that the requirements of the Standard are well implemented before they proceed to an initial assessment by the third-party Certification Body. Such facilities must be in operation for at least 3 months from commencing production to ensure that they can provide documentation and records to include all annual and semi-annual requirements to demonstrate full compliance to the Core and applicable modules Standard during the assessment. Examples of annual and semiannual records and documentation that shall be available for the initial audit Include:

- Water testing results
- Ice testing results
- Effluent testing if applicable
- Environmental testing
- Mock recall
- Finished product testing (if applicable)

Assessment Frequency

Audits to the Seafood Processing Standard are conducted at a frequency of once per annum. However, re-audits, short notice, or unannounced audits shall also be conducted at GSA and Certification Body discretion where facility compliance concerns arise.

Scope of Audit

Duration of Assessments, and Non-Conformities

The duration of an assessment is dependent on several factors such as the size of the operation, number of workers, process lines, HACCP plans, and/or number of species processed. In most cases the duration would be a minimum of two days (all on site or combined desktop review in advance, then on site). In all cases it shall be sufficient to ensure that a full assessment against the full scope of the SPS Standard, including the Annexes, is achieved.

The GSA will insist upon accurate assessments by the Certification Body with a duration sufficient to ensure integrity of the audit and achieve the audit objectives.

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The Certification Body shall be mindful that the assessment format is one of systems review and physical inspection of the site and manufacturing process. Time allocation during the assessment shall be such to provide sufficient and proportionate time for each activity to be carried out in full and where appropriate, additional time given when the Auditor is required to carry out further investigation.

All requirements in the Standard shall be addressed. As with other GSA-BAP standards, the audit against the SPS will consist of the elements cited in Figure 1 in accordance with ISO19011.

- Opening meeting
- Site assessment (including dormitory and canteen, if applicable)
- Collection of any necessary samples (product and effluent)
- Worker interviews
- Review of management systems / records and procedures
- Closing meeting
- Provision of non-conformance summary to the facility

Any Non-Conformity raised during the assessment will be recorded by the auditor as either:

Severity Level	Definition	Required Action
Critical	Where there is a critical failure to comply with a food safety, social compliance or legal issue or a risk to the integrity of the scheme.	The auditor will immediately inform the Certification Body, who will inform the GSA. Immediate temporary suspension may ensue pending clarifications and a re-audit may be necessary.
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	Objective evidence verifying the proper implementation of corrective action and closing of non-conformities shall be submitted to the Certification Body in accordance with GSA 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 GSA certification management rules.

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At the closing meeting, the Auditor shall present his/her findings and discuss all non-conformities that have been identified during the assessment but shall not make any comment on the likely outcome of the Assessment. A written summary of the non-conformities discussed at the closing meeting shall be agreed upon and signatures from the facility representative obtained. A copy of the non-conformity report must be left with the facility prior to the auditor departing the facility.

The facility shall provide the CB, in accordance with GSA-BAP/BSP certification management rules, suitable and adequate objective evidence that corrective action has been implemented to rectify the non-conformity. This evidence shall also address root cause and future prevention. The evidence will be reviewed, and the CB will respond either confirming closure of the non-conformity or requesting further evidence.

The facility must submit evidence to the CB to close out all non-conformities within 35 calendar days. Failure to close out non-conformities in the given timeframe will result in certification not being granted or continued, and facilities will be required to re-apply for a full assessment for certification (refer current issue of GSA-BAP/BSP Policy on Supplementary Audits of Facilities).

Audit Reporting and the Certification Decision

The Auditor will provide a full report of the assessment, including the details of any non-conformities issued. The Auditor will submit the report to the Certification Body. The report shall include brief statements of objective evidence of both conformity, and non-conformity.

The report shall follow the format specified by the GSA. The report shall be issued in accordance with the GSA Report Guidelines. Within the Assessment Report there shall be a record of the duration of the assessment (expressed as hours) and any reason for the lengthening or shortening of the duration from that which is typical.

The audit report along with the corrective actions submitted by the facility will be evaluated by a Certification Committee of the CB, who will make the final certification decision post closure of all non-conformities. The timelines for audit, closure of non-conformities, technical review and certification decision are as specified in the GSA-BAP/BSP CB Requirements Document. To achieve certification to the Seafood Processing Standard, the applicant facility must meet all of the requirements of the Standard.

The Applicant who commissioned the Assessment owns the Assessment Report. However, a written agreement shall be in place between the GSA-approved Certification Body and the auditee for the authorization of the provision of a Report to the GSA.

When audit reports are sent to the Applicant, they shall be in a secure (PDF) format to prevent modification.

The Assessment report will be considered by a Certification Committee of the Certification Body, who will make the final certification decision.

Appeals

The Applicant has the right to appeal the certification decision of the Certification Body. Appeals should be made in writing within seven days of the Certification decision.

A full response will be given by a Certification Body Manager independent of the auditor and Certification Committee.

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GSA Certification

To achieve Certification to the Seafood Processing Standard, the Applicant must meet the applicable requirements of all components of the Seafood Processing Standard Core and any applicable modules .

The Standard and the Four Pillars of Responsible Aquaculture and Fisheries Management.

The Four Pillars:

- Food Safety
- Social Responsibility
- Environmental
- Animal Health and Welfare

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C. SPS Core Standard Requirements

C1 Regulatory Management

1.1 License to Operate

1.1.1 The facility shall demonstrate that they are entitled to process and produce seafood at the site applied for. This includes documents to verify the following:

1.1.1.1 Legal land and water use by the facility.

1.1.1.2 Current business and operating licenses.

1.1.1.3 Compliance to applicable environmental regulations for construction and operation.

1.1.3.4 No Discharge into Natural Water Bodies: Facilities that do not discharge any effluents directly or indirectly into naturally occurring water bodies and comply with all other SPS requirements are eligible for GSA certification.

1.1.1.5 Discharge to Municipal or Private Treatment Plants: Facilities that have a valid contract with a municipality or industrial park facility that assumes the responsibility to treat and dispose of effluents in compliance with government, regional and local regulations are eligible for GSA certification if all other GSA requirements are met.

1.1.1.6 That the facility is aware of, and complies with, all current relevant legislation of both the country they produce seafood in, the countries they export to.

1.1.1.7 Products shall be properly labeled with all information, including allergens, as required by local legislation and legislation of the country of destination, including documentation to support any substantiated claims. Products shall also supply information to ensure safe handling, storage, preparation and use of the product along the supply chain or by the consumer.

1.1.1.8 Live seafood, including but not limited to finfish and molluscan shellfish, shall be purchased only from commercial sources that are licensed according to applicable laws and regulations, and harvested legally.

C2 Quality Management System (QMS)

2.1 General Requirements

2.1.1 The facility shall have a QMS that is documented, authorized by senior management, effectively implemented, maintained, and designed to continually improve the food safety management system. The elements of the QMS shall include elements of a food safety culture which shall include at a minimum:

- Communication
- Training
- Mechanism for feedback from employees
- Performance of food safety related processes

2.1.2 The QMS shall be reviewed and updated after a food safety incident or product recall, with a minimum frequency of annually.

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2.1.3 The facility shall define, document, and ensure that quality and food safety objectives/Key Performance Indicators are monitored with measurable outcomes. Monitoring results shall be presented to management during system reviews. Management shall implement the policies and procedures to support the development, implementation, and enhancement of a food safety culture. The food safety culture shall be initiated by the senior management and shall be integrated throughout the organization. The facility shall define, document, and ensure that quality, food safety and food safety culture objectives/Key Performance Indicators are monitored with measurable outcomes. Monitoring results shall be presented to management during annual system reviews.

2.1.4 Facilities shall have a copy of the current version of the SPS on site that the facility is being audited against.

2.2 Quality Manual

2.2.1 The facility shall have a Quality Manual which incorporates Food Safety that is readily available to all personnel involved in quality management and shall:

2.2.1.1 Include controls that address all requirements of the SPS, including all applicable modules.

2.2.1.2 Include the products to be processed and shall also include documented procedures or specific reference to them.

2.2.1.3 Clearly define all the quality and food safety attributes for all raw material received, and finished products produced, that shall be monitored and controlled to ensure conformance to legal requirements and customer and facility specifications.

2.2.1.4 Include at a minimum: definition of sampling size, testing frequency, procedures, maximum or minimum tolerance levels, corrective action, responsible personnel, and record-keeping requirements associated with all of the quality management procedures.

2.3 Quality Management System Policy Statement

2.3.1 As part of the Quality Manual, the facility shall have a clearly defined and documented food safety and Quality Management System Policy statement, authorized by senior management, that reflects its commitment to the entire scope of the SPS Standard, including food safety culture and the relevant modules.

2.4 Management Responsibility and Organizational Structure

2.4.1 The facility shall have an organizational chart that reflects the current plant management and members of the HACCP team, and at a minimum, those workers and their back-up personnel responsible for compliance with quality assurance, legality, and food safety requirements.

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2.4.2 The facility shall also define and document job functions, responsibilities, and reporting relationships of at least those workers whose activities affect product quality, legality, and food safety.

2.4.3 The facility shall identify the membership and Competency of the HACCP team. Competency shall be demonstrated through documented evidence of HACCP training and training effectiveness.

2.5 Management Commitment and Review

2.5.1 The facility's senior management shall demonstrate their commitment to the development, and continuous improvement to the QMS, and provide all the resources needed for implementation and maintenance.

2.5.2 Management reviews shall include senior management and occur at planned intervals - at a minimum annually to ensure the plans, procedures and systems are up-to date and continue to be effective and comply with the full scope of SPS including relevant modules.

2.5.3 Minutes of the management review meeting shall be maintained and available for review.

2.6 Purchasing & Specifications – Items

2.6.1 The facility shall have written specifications and document all items purchased that impact food safety, regulatory requirements, and quality. The purchasing process shall be controlled by designated personnel to ensure these items conform to requirements.

2.6.1.1 The facility shall demonstrate control through, at a minimum: the appointment of designated purchasing personnel and written purchasing procedures. (See also 2.7 – "Supplier Approval and Performance Monitoring").

2.6.2 Specifications shall be kept up-to-date and periodically reviewed, which shall occur at a minimum annually and be readily available for designated workers.

2.7 Supplier Approval and Performance Monitoring

2.7.1 The facility shall exercise control over any products (e.g., raw material, packaging, additives, and ingredients) and service providers that may have an impact on food safety, legality, quality, environmental impact, animal welfare, traceability, and social responsibility.

2.7.2 The facility shall have a supplier approval program which includes a list of approved suppliers and service providers. This list shall be kept up-to-date and reviewed, at a minimum, annually.

2.7.3 The supplier of products and services approval programs shall include all suppliers described in 2.7.1. The program shall also include criteria for approval, and the facility's policy and/or procedure for temporary use of unapproved suppliers.

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2.7.4 The facility shall have in place a procedure for regularly monitoring the performance of suppliers of products and services. This monitoring shall be conducted at a frequency that is based on the risk level of the products or services supplied. Performance criteria shall be defined as well as actions to be taken where performance does not meet criteria. The results of the supplier performance assessments and follow-up actions shall be recorded.

2.7.5 The primary facility shall not purchase the peeling and de-heading of shrimp from 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 OSP1. Such establishments are either:

- owned by the applicant facility or;
- completely controlled by the applicant facility with valid agreements in place or;
- are located onsite of the primary facility or located within a 90 minute or less commute to the primary facility and included as part of the scope of the annual SPS audit

2.8 General Documents Requirements

2.8.1 The facility shall have a written document control procedure that ensures all documents and procedures necessary for compliance with the full scope of the Seafood Processing Standard including modules, are in Implemented and controlled.

2.9 Procedures

2.9.1 The facility shall prepare and implement standard operating procedures, quality procedures, food safety management procedures, social accountability procedures, animal welfare procedures and work instructions for all processes and operations having an effect on product safety, legality and quality.

2.10 Record Keeping

2.10.1 The facility shall maintain records that demonstrate compliance to the full scope of the SPS and relevant modules. Records, including electronic records, shall be complete, securely stored, and available as needed by workers and auditors.

2.10.2 Records shall be retained for a time period required to meet customer, regulatory, and legal requirements. At a minimum this shall be for 4 years.

2.10.3 All monitoring and corrective action records shall be reviewed by a qualified individual other than the person completing the records.

2.10.4 All records and other documentation shall be accurate and not show evidence or indication of falsification or adulteration.

2.10.5 Where local, national, or international government auditing or inspection programs exist, these records shall be made available for review.

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2.10.6 HACCP Records shall be reviewed by a HACCP-trained individual.

2.11 Corrective and Preventive Action

2.11.1 The facility shall ensure that procedures for the determination and implementation of corrective action, in the event of any non-conformity, are prepared and documented. These shall cover the full scope of the SPS and relevant modules and shall address how future reoccurrences shall be prevented.

2.11.2 All Non-conformities shall be recorded, and the cause(s) of the problem investigated to ensure that a documented response is taken by facility personnel.

2.11.3 The effectiveness of corrective and preventative actions shall be included in a regular review of activities and systems. If time scales for actions are not met, it is required that the reason for this is recorded.

2.12 Control of Non-Conformity

2.12.1 The facility shall have a documented procedure to ensure that any product which does not conform to requirements is clearly identified and controlled to prevent unintended use or delivery. This shall include all products that do not conform to food safety, quality, legality, or customer requirements. The disposition of non-conforming product shall be determined by authorized personnel and documented.

2.13 Serious Incident Management

2.13.1 The facility shall have a documented business continuity procedure that describes how product safety and quality shall be maintained in the event of a serious incident.

2.13.2 Serious incidents that occur at the facility shall be documented. Records of product handling and status during and after the incident shall be maintained. This shall cover at a minimum how product integrity, worker safety and key facility operations will be maintained.

2.14 Product Recall and Withdrawal Plan

2.14.1 There shall be a written Recall and Withdrawal Plan that addresses how product that has been shipped shall be identified, located, and recalled or withdrawn in the event of rejection or non-conformity related to food safety, legality, or quality. This plan shall also ensure that non-conforming or recalled products are not mixed with conforming products or released without proper authorization.

2.14.2 The Recall Plan shall list all personnel that are part of the recall team. Including the recall teams out of office contact numbers and responsibilities. The plan shall include a list of all key external regulatory agencies that require notification in the event of product recall. The facility shall notify the certification body and SPS Program owner (GSA) directly within 24hrs of a recall related to food safety.

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2.14.3 The Recall and Withdrawal Plan shall be tested at a minimum annually through a "mock recall" test. Documented results shall identify, at a minimum: the "mock" incident, identification of all products affected and where it was shipped, how customers that received it were (or would have been) notified, and what percentage of product was successfully identified to be "recalled/withdrawn." The time taken for the mock test shall be recorded.

2.14.4 The "mock recall" tests shall successfully identify 100% of the product. Corrective action(s) shall be documented and implemented for any deficiencies identified in the mock recall/withdrawal system. These corrective actions shall be used to review and revise the Recall and Withdrawal Plan.

2.14.5 There shall be a designated management person for determining the status or disposal of recalled or withdrawn product.

2.15 Customer Complaint Procedure

2.15.1 The facility shall prepare and implement a system for the management of customer complaints to control and correct shortcomings in food safety, quality, legality, and customer satisfaction.

2.15.2 All customer complaints shall be documented. Records shall include: the nature of the complaint, investigation, product affected, root cause analysis, corrective and preventive action, product status where appropriate, and final complaint resolution.

C3 Food Safety Management

3.1 Food Safety – Hazard Analysis and Critical Control Point (HACCP) Compliance For all Species

3.1.1 The HACCP plan and hazard analysis shall include, at minimum, those hazards identified by Codex Alimentarius, or the USFDA's "Fish and Fishery Products Hazards and Controls Guidance" (aka "FDA Hazards and Controls Guide"), to current editions. Where either the requirements for the country of product origin or country of export apply, the stricter shall prevail. In the absence of specific legislation or guidance for country of origin or product export countries, the hazards defined in the current issue of "FDA Hazards and Controls Guide" (for facilities processing fish of the order Siluriformes, Mandatory Inspection of Fish of the Order Siluriformes and Products Derived From Such Fish).

3.1.2 The scope of the HACCP system shall be defined per product, per process line/or process-location. It shall include verified process flow diagram(s) including those that are outsourced, the description of the product and its presentation(s), intended use, and method of distribution. The accuracy of the process flow diagram shall be verified, at a minimum, annually by all members of the HACCP team.

3.1.3 All Critical Control Points (CCPs) shall be properly identified, and procedures accurately followed in order to control or prevent hazards.

3.1.4 The HACCP plan and hazard analysis shall include a list of all allergens present at the facility, including the various species of seafood handled. Each species shall be identified by their scientific name. All allergens shall be effectively controlled throughout the entire operation of the facility including receipt, storage, handling, and use.

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3.1.5 The facility shall demonstrate that they have labeled the presence of allergens in the finished product.

3.1.6 All critical limits set at each CCP shall be based on validated processes, industry standards or scientific and regulatory guidance.

3.1.7 Monitoring procedures shall be in place to control each hazard at each CCP and documented in the HACCP plan. These procedures shall include the monitoring frequency, methods, responsible personnel, and associated records.

3.1.8 The facility shall identify in the HACCP plan, corrective actions that shall be taken any time a critical limit is not met at any CCP. The corrective actions taken shall be documented. The corrective actions shall include product disposition, as well as root cause and future prevention.

3.1.9 A properly functioning metal detector or an X-ray machine shall be in place to check all finished product, unless the facility can demonstrate, through hazard analysis in its HACCP plan, that it is not reasonably likely to expect metal fragments could enter the food.

3.1.10 Facilities shall include in the hazard analysis potential hazards from environmental contaminants at the farm or harvest sites they source from. This includes chemicals, pesticides or heavy metals that may originate from industrial or agricultural operations near the producing farm or harvest site.

3.2 Food Safety – Hazard Analysis and Critical Control Point (HACCP) Compliance for Farm Raised Species

3.2.1 The HACCP plan shall include monitoring at reception (i.e., receiving) for residues of unapproved aquaculture drugs appropriate for the species. The facility shall base sampling plans on risk assessment and supplier agreements, and historical analysis. The facility shall have a well-documented verification program in place covering all drugs per SPS prohibited chemical residues.

3.2.2 The facility shall include in their HACCP plan, testing for other approved and unapproved and/or banned drugs at reception, beyond those listed in the **Finished Product Testing Module** (FPT Table 1) where compliance with country of origin or country of export laws or buyer specifications require it.

3.3 Food Safety - HACCP Procedures Assessment

3.3.1 The HACCP Team shall meet regularly to review HACCP compliance and assess the need for plan revisions. The team shall consist of appropriately qualified multi-disciplinary personnel with a designated team leader identified. Such reviews shall be conducted to assess effectiveness and shall be conducted in advance of any change in the product, processes or ingredients that may have an impact on food safety. Records of these meetings shall be kept. Where there have not been any changes, such meetings and plan assessments shall occur at minimum annually.

3.3.2 Usage of chemicals shall also be reviewed to ensure that such usage conforms to the regulations of both the country where the production occurs, and the country to which products will be exported.

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3.4 Food Fraud

3.4.1 The facility shall have a documented food fraud vulnerability assessment procedure (VACCP Vulnerability Assessment Critical Control Points) in place to identify potential vulnerability and prioritize food fraud mitigation measures. The VACCP shall follow the format of the Food Fraud Vulnerability Assessment tool or similar www.ssafe-food.org.

3.4.2 The food fraud plan and risk assessment shall be reviewed anytime a new vulnerability is exposed, but at a minimum, annually.

3.4.3 The facility shall have a documented plan in place that specifies the measures the organization has implemented to mitigate the public health risks from the identified food fraud vulnerabilities.

3.4.4 The facility's food fraud mitigation plan shall be supported by the organization's Food Safety Management System.

3.5 Food Safety – Food Defense

3.5.1 The facility shall have a documented risk assessment system and procedure (Food Defense Plan) in place to identify and address food defense risks. This shall be established, implemented, and maintained to prevent, reduce, or eliminate these risks, and shall be included in the facility's Food Safety Management System. The Food Defense plan and risk assessment shall be reviewed at a minimum annually.

3.5.6 Personnel responsible for the implementation of the food defense plan (the "food defense team") shall be clearly identified in the document. Members of the food defense team shall receive training and have knowledge in this area to ensure the effective implementation of the food defense plan. and shall ensure that the mitigation strategies are assessed to verify that the food defense plan is being effectively implemented.

3.6 Food Safety – Plant Sanitation – Pest Control

3.6.1 The facility shall have in place a pest control program/system that prevents and controls risk of pest infestation and harborage areas inside the facility and on facility grounds. Pest control shall be performed by either a licensed third-party or properly trained personnel within the facility. Chemicals used in food facilities shall meet at minimum US EPA standards or equivalent.

3.6.2 Litter/garbage and discarded equipment shall be properly disposed of or stored to avoid the creation of pest harborage areas.

3.6.3 Windows, doors, walls, and other openings to the outside of the facility shall be sealed, screened, or covered to exclude pests and shall ensure all proper steps are taken to prevent pest entry through effective building design, maintenance, operational procedures, and employee training.

3.6.4 All pest traps shall be located so as not to contaminate food-processing areas. Poison bait traps shall not be located inside food production.

3.6.5 The facility shall have a program for pest trap inspection that includes a map of trap locations, regular cleaning and records of pests caught to allow for a trend analysis to be conducted on an annual basis and all pest traps shall be fully operational.

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3.6.6 Processing and primary storage areas in the facility shall show no evidence of pests or pest activity.

3.7 Food Safety - Plant Sanitation - Facility Design and Construction

3.7.1 The facility's grounds and outside areas shall be maintained to prevent worker safety hazards, environmental hazards, and pest harborage risks.

3.7.2 All food contact areas and equipment shall be constructed of food grade materials, shall be designed, installed, constructed, and used to prevent product contamination.

3.7.3 Restrooms and other personal hygiene areas shall open directly into transition areas with proper sanitation controls and not directly into processing areas inside the facility.

3.7.4 Internal floors and walls shall be made of a smooth, impermeable material that can be readily cleaned and sanitized.

3.7.5 The floor wall junctions shall be properly sealed and maintained to prevent the accumulation of waste and contaminants.

3.7.6 Floors shall be designed to avoid pooling of water and accumulation of waste and contaminants.

3.7.7 The facility shall have a production flow that maintains separation between finished and unfinished products to prevent cross contamination.

3.8 Food Safety - Plant Sanitation - Maintenance

3.8.1 A comprehensive maintenance program, including preventative maintenance, shall be in place and documented. This program shall include walls, floors and all items of equipment and other food contact surfaces critical to product quality and safety. The program shall include at a minimum:

- An itemized list of items and areas to be maintained.
- A preventative maintenance schedule.
- Records of inspections and maintenance performed.

3.8.2 All overhead lights in food production and primary storage areas shall be shielded or made of shatterproof material to prevent glass contamination of product from broken bulbs.

3.8.3 The facility shall provide lightening fit for purpose in processing and product inspection areas.

3.8.4 The ceiling of food production, food packaging, ingredients and chemical storage areas shall be maintained. There shall be no evidence of leaks, mold, rust or flaking paint.

3.8.5 All floor surfaces in food production and primary storage areas shall be in good condition, and free of significant cracks or gouging. Where floor damage exists, the repairs shall be on the preventative maintenance schedule, the time period allowed for the repair shall be based on risk.

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3.9 Food Safety – Plant Sanitation – Cleaning and Sanitation

3.9.1 Work surfaces that come in contact with food products (tables, equipment, utensils, employee gloves and clothing) shall be in good condition and cleaned and sanitized before use. This includes walls in production and food storage areas which shall be kept clean.

3.9.2 Facilities shall maintain a written Standard Sanitation Operating Procedure (SSOP) that details cleaning frequency and designates implementation and verification responsibilities.

3.9.3 Sanitation verification shall include a risk based environmental monitoring program for assessing the effectiveness of cleaning and sanitizing activities. Planned and frequent microbial analyses (ATP or protein residue tests) of food contact areas shall be carried out after cleaning and sanitizing.

3.9.4 Records of environmental verification analyses shall include Listeria spp. (for drains only), and other process related indicator organisms such as Enterobacteriaceae, or standard plate count.

3.10 Food Safety- Plant Sanitation - Personnel

3.10.1 The facility shall have a documented personal hygiene standard and program that prevents product contamination and that, at a minimum, includes the below elements and other related elements of this standard - as well as additional measures as appropriate based on risk.

3.10.2 Medical screening procedures shall be in operation for employees, contractors, and visitors.

3.10.3 All employees shall be monitored for visual signs of contagious illnesses upon arrival and during work in food production and packing areas. Workers found to be ill shall be removed from the facility site and records shall be maintained.

3.10.4 The facility shall have a policy in place that requires employees to report immediately to their supervisor if, during the workday, they become injured or ill.

3.10.5 All workers in food production and packing areas shall not wear jewelry and shall not carry items in pockets unless approved by management. Medical bracelets, necklaces or wedding bands may be worn with proper protection to prevent food contamination with management approval. Such jewelry shall be smooth with no stones or recessed areas.

3.10.6 Workers shall be provided with and wear protective clothing for their assigned tasks.

3.10.7 Employees shall keep food and drink out of processing, packing and storage areas, and shall not smoke or chew tobacco or gum. This clause also includes e-cigarettes, hallucinogenic or recreational drugs and personal medication.

3.10.8 Employees shall keep personal items out of processing, packing and storage areas.

3.10.9 The facility shall have foot baths, antibacterial granules, foamers or sprayer systems, handwashing/hand dip and sanitation stations that are accessible throughout food production areas. These shall be maintained and not easily avoided to promote good sanitary practices.

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3.10.10 The facility shall monitor and enforce employee compliance with sanitary procedures as stated in facility GMP/ hygiene policies.

3.10.11 The facility shall provide sanitary supplies, (or where culturally applicable, washing facilities), disposable hand towels or other drying mechanisms, and soap in employee sanitary facilities. Mechanical air-drying devices shall be tested based on manufacturers recommendation or risk assessment for microbiological contamination.

3.10.12 There shall be a documented policy that instructs contractors and visitors on facility sanitation and hygiene policies, including hand washing, control of personal items, and the proper use of protective clothing. They shall be required by the facility to follow these policies.

3.11 Food Safety - Plant Sanitation - Ice, Water, Air, Gases and Steam

3.11.1 Water used in food production areas shall be checked at least every six months for microbiological parameters by an accredited 3rd party laboratory, additionally one of the semi-annual tests shall include heavy metals as stated in water & ice testing table 1.

3.11.2 Routine water quality checks during production days shall be carried out by the facility for residual disinfectant levels (such as chlorine or ozone). These checks shall occur at a minimum daily. The facility shall also test for the presence of coliforms monthly.

3.11.3 The facility shall prevent water contamination through backflow pressure valves and proper hose storage.

3.11.4 Ice used on product or food production areas in the facility that is purchased from outside sources shall be tested at least every six months by a third-party laboratory for microbiological parameters, additionally one of the semi-annual tests shall include heavy metals as stated in water & ice testing table 1.

3.11.5 Ice produced by the facility shall be tested at least every six months by a third-party laboratory ONLY for the microbial parameters listed in water testing tab.

3.11.6 Ice shall be stored in hygienic and well-maintained areas free of dripping condensation, rust, dirt and other contaminants. Ice shall not be re-used and shall be handled to avoid cross-contamination from any source, including utensils, employee garments, storage, and transport bins.

3.11.7 Routine ice quality checks, regardless of source, shall be carried be out by the facility for the presence of coliforms monthly.

3.11.8 Facilities shall have a procedure in place that ensures the safety of air, compressed air, steam, or other gases used in direct contact with food, food packaging or an ingredient in food. The facility shall monitor these items to verify that they do not pose a risk of contamination to food or food contact surfaces.

3.11.9 Non-potable water shall be kept separated from potable water sources during storage, conveying for use in the facility and during use. Piping and containers used for non-potable water shall be visibly marked.

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3.12 Food Safety-Chemical Products used for Plant Sanitation

3.12.1 All chemicals, including cleaners, sanitizers, chlorine, boiler chemicals, and any other chemicals utilized in the production areas shall be approved for use in food plants and used per manufacturer's instructions.

3.12.2 Monitoring records for all chemicals shall be maintained at a frequency recommended by the chemical supplier. These shall include at minimum the name of the chemical, concentration level, and tests performed to verify the correct concentration.

3.13 Food Safety – Plant Sanitation – Ventilation

3.13.1 There shall be no condensation which has the potential to contaminate product, packaging materials, ingredients, or food contact surfaces.

3.14 Food Safety – Storage and Transportation

3.14.1 Procedures shall be in place to ensure raw materials, packaging, cleaners, sanitizers, and ingredients are used in the correct inventory/stock rotation order and within the allocated shelf life (where applicable).

3.14.2 All items in warehouse areas, products, ingredients, packaging, and other food contact items shall be stored off floors, away from walls and covered to protect from contamination.

3.14.3 The facility shall maintain temperature records for the effective monitoring of frozen storage areas at minus 18 °c or colder and coolers at 0-5°c refrigerated/chilled storage.

3.14.4 Raw material and finished product in frozen and refrigerated storage shall be off the floor on pallets. There shall be space maintained between pallets and space between pallets and freezer/refrigerated store walls to allow air flow.

3.14.5 All vehicles, including contracted out vehicles, used for the transportation of raw materials, ingredients, packaging, intermediate/semi processed product and finished product shall be suitable for the purpose, maintained in good repair, at the proper temperature, where applicable, and be cleaned to ensure contamination of the transported goods does not occur. Temperature controls, where applied, shall be continuously monitored and records shall be available.

3.14.6 There shall be a written inspection plan for all inbound and outbound goods that include, at minimum, the items listed in 3.16.5. Such checks shall ensure the items and delivery containers meet specifications for safety and quality.

3.15 Food Safety – Cross-Contamination

3.15.1 The facility premises, equipment, procedures, and flow shall be designed, constructed, and maintained to prevent the risk of contamination or allergen cross contact to food, food contact surfaces and ingredients.

3.15.2 Cleaning and sanitizing activities shall not occur where exposed product, packaging, ingredients, or utensils are nearby to prevent cross-contamination.

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3.15.3 All products in chilled and/or frozen storage shall be kept in protective sealed cartons or if this is not possible in storage system that shall prevent contamination or dehydration.

3.15.4 There shall be effective procedures in place to prevent cross-contamination and cross contact between allergen and non-allergen products, ingredients, utensils, and workers throughout receipt, storage, handling, and use. Such procedures shall also be in place to prevent cross-contamination between ingredients or products with different allergens.

3.15.5 There shall be a foreign materials prevention program (or series of separate programs), that prevents contamination from all forms of foreign material, including but not limited to paint, wood, glass, plastic, metal, hair, rust, etc.

3.16 Food Safety – Product and Process Testing

3.16.1 There shall be a written program for the use of food additives or chemicals such as sulfites, color additives, phosphates, phosphate blends or other moisture retention agents. The facility shall also verify that these items are food grade and used in compliance with legal, customer, and manufacturer's requirements.

3.16.2 The facility shall conduct microbiological testing on finished product lots as required by local and country of export legislations and customer specifications.

3.16.3 Product design and development procedure shall be established, implemented, and maintained for new products and changes to product or manufacturing processes to ensure safe and legal products are produced.

C4 Verification Management

4.1 Product Release

4.1.1 The facility shall document and implement appropriate Product Release Procedures that identify processes and testing procedures that shall be performed prior to release. These procedures shall identify the responsible personnel authorized to release of product and include food safety, quality and legal specifications that shall be verified as having been met prior to release into commerce.

4.2 Internal Audit

4.2.1 The facility shall have an internal audit system in place that requires assessment of the facility's performance against the full scope of the SPS including relevant modules .

4.2.2 The facility's internal auditors shall be trained and competent to conduct internal audits and shall not audit their own areas of operation.

4.2.3 Records of the Internal Audits shall be maintained. Records shall reflect results of the internal audit, including conformity and non-conformity. Where non-conformities are found, records shall document corrective actions and time frame for completion for each.

4.2.4 The internal audit frequency within the facility and its departments shall be determined by risk assessment and shall be carried out annually at a minimum.

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4.3 Instrument Calibration

4.3.1 Process-monitoring instruments critical to food safety, quality and legality shall be tested internally for accuracy.

4.3.2 The measuring and monitoring devices shall be labeled with tags that indicate instrument identification and calibration due dates. The facility shall maintain a documented accuracy check procedure and schedule that identifies all measuring and monitoring devices. The schedule shall identify:

- Each item to be checked;
- The date of the accuracy check;
- Scheduled frequency of the accuracy check;
- Recognized method, or standard used, of the accuracy check, and;
- Person conducting the accuracy check.

Instruments that cannot be adjusted to an accurate calibrated reference shall be repaired or replaced immediately.

4.3.3 The facility shall ensure that all measuring and monitoring devices critical to food safety are externally calibrated at least annually or to manufactures specifications by a qualified third party and are traceable to a national or international recognized standard.

4.4 Sampling and Inspection

4.4.1 The facility shall prepare a written sampling plan based on risk that details the frequency and type of product testing. This sampling plan shall also incorporate any testing that is required by current certifications, customers, or regulatory authorities.

4.5 Laboratory Testing

4.5.1 The facility shall prepare and implement a system to ensure that all product and ingredient testing and analysis critical to food safety are conducted to ISO 17025. If it is necessary to use a non-accredited laboratory, the laboratory must be operating under the principles of ISO/IEC17025, including participating in an accredited proficiency testing program. Pathogen testing must not be conducted in the same location as the processing facility.

4.5.2 Records of third-party laboratory testing, testing methods, and the accreditations or approvals they have, shall be reviewed, and maintained. Actions shall be conducted to address any out-of-range results.

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C5 Social Accountability Requirements

5.1 Ethical Trading Policy

5.1.1 The facility shall have an Ethical Trading Policy in place, approved by senior management, to demonstrate the facility's commitment to comply with all applicable national anti-bribery laws and prohibit any act of corruption, extortion, embezzlement, or any form of bribery – either directly or indirectly.

5.2 Wages and Benefits

5.2.1 The facility shall ensure that all workers are paid at least the legal minimum wage excluding overtime payments, or the wage rate established by an employment contract or collective bargaining agreement, whichever is higher.

5.2.2 The facility shall provide benefits that, at minimum, are required by local or national law or collective bargaining agreements. If not required by law the facility shall endeavor to provide these minimum benefits that provide decent working conditions for its workers to include holiday entitlements, sickness benefits, medical or health insurance and paid maternity/paternity leave.

5.2.3 The facility shall compensate workers for overtime hours worked beyond the nationally mandated regular work week, at a premium rate, or which should be at least the rate determined by an employment contract, collective bargaining agreement or as required by local law, whichever is higher.

5.2.4 The facility shall not make deductions from wages that are not permitted required by national law or a collective agreement or have been specified in the worker's written contact.

5.2.5 The facility shall not make deductions from wages as part of a disciplinary process.

5.2.6 Workers shall be informed about any deductions in writing and/ or in a language/format that is understandable by the worker.

5.2.7 The facility shall only have access to a worker's account to make deposits.

5.2.8 Payment of wages shall not be made to someone other than the worker or into an account not controlled by the worker.

5.2.9 All workers shall be paid in full, in legal tender or a bank account in his/her name and as minimum on a monthly basis on per the worker's contract of employment.

5.2.9.1 All wage payments shall be documented.

5.2.10 The facility shall not use contractors, subcontractors, temporary workers, homeworkers, apprentices, or other non-full-time employment schemes to avoid the payment of benefits, social security, etc. required by local or national law under a regular employment relationship.

5.2.11 The facility shall maintain all relevant documents, including complete and accurate work records and time sheets, that verify all workers, including contractors and piece workers, are paid in compliance with local or national law, including regulations regarding equivalence to or exceeding minimum requirements regarding wages, overtime, and holiday pay.

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5.3 Working Hours

5.3.1 The facility shall set working hours that shall not exceed 48 hours, excluding overtime, that complies with local or national laws, collective or contractual agreements, where applicable, or industry standards in the country, whichever affords greater welfare to the workers.

5.3.2 No worker shall work more than 12 hours overtime in any regular working week unless, it is voluntary, it has been granted under exceptional circumstances, is permitted by national law, has been demonstrated that safeguards exist to protect worker health and safety.

5.3.2.1 If applicable national laws permit working hours greater than 60 hours per week, the maximum total hours worked shall be verified as meeting national requirements and the worker's name, position and number of hours worked in a given week shall be recorded.

5.3.3 All workers shall have the right to rest breaks during work shifts.

5.3.4 Workers shall have the right to at least one full rest day (24 consecutive hours) after 6 consecutive days worked, or two full rest days in a 14-day period.

5.3.5 The facility shall not terminate an employee's contract or deploy any other detriment for refusal to work overtime that the worker has voluntarily agreed to.

5.4 Forced, Bonded, Indentured, Trafficked and Prison Labor

5.4.1 All work including overtime shall be voluntary. Workers shall have the right to terminate their employment contract, or voluntary overtime agreement without the threat of, penalty, or sanction, and can leave their employment after they serve an agreed period of notice.

5.4.2 A facility shall only use voluntary prisoner labor if this is part of rehabilitation program operated by national regulators and each prisoner shall be given a contract/work agreement stating their rights as a minimum to cover occupational health and safety requirements and remunerated to be paid at least the minimum wage.

5.4.3 No worker shall be required to pay any deposits, bonds or collateral guarantees or recruitment fees or related costs to secure employment with the facility.

5.4.4 All workers shall have the right to move freely in the facility where necessary for health and safety and food safety reasons and to leave the premises after their work shift.

5.4.5 The facility shall prominently display information, in local languages or format understandable by the workers, regarding complaints and grievances, hot-lines, competent authorities, and other resources for victims of labor rights for ease of access to workers and jobseekers.

5.4.6 If advances and loans to workers are provided, the facility shall have a written policy stating terms and conditions and this shall be communicated to workers in an understandable manner before they accept the loan or advance. These terms shall not be used to bind workers to employment.

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5.5 Child Labor and Young Workers

5.5.1 Does the facility employ young workers under 18 years of age?

5.5.2 The facility shall not engage in or support the use of child labor. The facility shall comply with local child labor laws regarding minimum working age, or the age of compulsory education, or, the ILO Minimum Age Convention 138, whichever is higher. The facility shall collect, verify, and retain age-related records of workers to confirm that the age requirements are met.

5.5.3 Young workers shall not be subjected to conditions which compromise their health, safety, or moral integrity, or which harms their physical, mental, spiritual, moral or social development. This includes restricting working hours and prohibiting night work and hazardous work.

5.5.4 The facility shall have in place remediation policies and procedures for support to anyone identified as a child laborer in the facility. Depending on the age of the child, support must include at a minimum removal and reintegration into education.

5.5.4.1 If the remediation procedure is activated the facility shall keep a record of all the actions taken and put in place to avoid any recurrence.

5.6 Hiring and Terms of Employment

5.6.1 Workers shall have a legal right to work in the country they are employed in. Work performed and terms of employment shall be in compliance with local, national or international labor standards, whichever is stricter.

5.6.2 All workers, including temporary and those employed through recruitment agencies, shall enter into work under a signed agreement, available in a format/language they understand, describing terms and condition of employment.

5.6.3 Facilities shall have policies that encourage hiring of workers directly, and when recruitment agencies are used they are compliant to this standard and are:

- Licensed (if applicable)
- Compliant to applicable national regulations
- Operate in an ethical manner

5.6.4 Facilities shall have procedures to verify the above

5.7 Discrimination, Harassment, Complaints, and Discipline

5.7.1 The facility shall have an equal opportunity policy in place and shall not engage in, or permit, discrimination in all aspects of recruitment, employment, and compensation based on legally protected personal characteristics. Terms and conditions of employment shall be based upon the ability to do the job, not on personal characteristics or beliefs.

5.7.2 The facility shall have a workplace policy to cover violence and harassment in the workplace to treat all workers with dignity and respect and not engage in or permit actual or threats of psychological, physical, verbal, or sexual abuse, bullying or harassment.

5.7.3 The facility shall not terminate employees for pregnancy, force the use of contraception, or reduce wages or discriminate in any way after maternity/paternity leave for returning

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workers. Jobseekers and workers shall not be subjected to pregnancy or virginity or HIV or STI testing.

5.7.4 The facility shall have in place a written procedure to address grievances, complaints, and concerns by all workers and external parties without fear of retaliation.

5.7.5 The facility shall have in place an established complaints and remediation system to handle cases and allegations, including sexual abuse/harassment, bullying or discriminatory practices for both the jobseekers and workers. This shall, at a minimum, include a confidential reporting mechanism, information on any hotlines or other outside services available, and the possibility of initiating an independent assessment/arbitration.

5.7.6 A record of actions taken to address grievances, complaints, and concerns shall be retained for up to 3 years in a secure and confidential manner and shall state what the specified time frames were to close off each issue identified in the investigation.

5.7.7 Cases of forced, bonded or child labor within a facility's operation or associated supply chain, whether perceived or proven, shall be reported to GSA and the facility's certification body immediately, or at least within 48 hours of such issue being identified by the facility.

5.7.8 The facility shall have a remediation procedure to be implemented when cases of forced, bonded or child labor are identified within its operation or associated supply chain, that shall create a remediation plan to support the rehabilitation of the affected worker and where necessary ensure that different actions are taken dependent on the age of the worker.

5.7.9 The facility shall have a written disciplinary procedure made available in the language of the workers.

5.7.9.1 Records of investigations with documented outcomes including disciplinary actions shall be retained in a confidential manner for a minimum of three years after which time the records shall be destroyed.

5.7.9.2 The facility shall ensure that disciplinary actions do not include fines, or the threat or mention thereof, or other deductions not permissible by national legislation.

5.8 Freedom of Association and Collective Bargaining

5.8.1 All workers shall have the right to associate, organize, and bargain collectively (or refrain from doing so) without the need of prior authorization from management. Facilities shall not retaliate against workers exercising their right to representation in accordance with international labor standards.

5.8.2 Where the right to freedom of association and collective bargaining is prohibited or restricted under local or national law, the facility shall strive to engage alternative means to facilitate worker representation and negotiation (for example, the election of one or more workers by other workers to represent them to management).

5.8.3 The facility shall grant worker representatives access to the workplace in order to carry out their representative functions.

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C6 Employee Health and Safety

6.1 Employee Facilities and Housing

6.1.1a Does the facility provide temporary or permanent accommodations (housing)?

6.1.1b If yes can the worker "opt out" of using this temporary or permanent accommodation provision

6.1.2 If accommodations are provided, they shall be located in a separate building from operational and storage areas.

6.1.3 If provided or mandated by the facility or employment agency/labor agency, worker housing shall meet local and/or national standards including but not limited to safe, watertight structures, adequate space as per occupational load for the facility, heating/ventilation/cooling, pest control, sink, shower, and toilet provisions.

6.1.4 The facility shall provide safe, healthy, and clean conditions in all designated work, rest, dining, and housing areas as applicable. This includes, but is not limited to, provision of potable water, sanitary toilet facilities, and clean kitchen and food production storage areas.

6.1.4.1 Workers shall have access to free potable water close to their place of work.

6.1.5 The facility shall have enough private and safe toilets and hand wash stations in compliance with local and national laws which are managed to accommodate the demand during worker breaks. These shall be accessible to employees and kept in good repair.

6.1.6 All workers shall be provided with private changing facilities free of charge that are safe, hygienic, fully accessible and secure to store all their personal documentation and belongings.

6.1.7 If meals are provided, they shall be safe, wholesome, or nutritious and commensurate with local eating customs of the workforce.

6.1.7a Are meals provided free to workers?

6.1.7b Are meals provided at a cost to workers?

6.2 Worker Health and Safety

6.2.1 How many health and safety accidents and incidents were reported over the past 12-months at the facility?

6.2.2 The facility shall appoint a management person responsible for ensuring worker health, safety, and training.

6.2.3 The facility shall identify, prevent, eliminate, or minimize any workplace health and safety hazards through risk assessment analysis conducted as a minimum on an annual basis or after an incident or accident or near miss by a competent individual.

6.2.4 Health and safety incidents, investigations of accidents, and their cause and corrective actions shall be documented. Appropriate corrective actions shall be taken and results shall be communicated to the facility management and at risk workers.

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6.2.5 The facility shall have a fire and emergency protection and prevention plan in place covering all parts of the facility including the and housing areas, where applicable. This shall include, but is not limited to, applicable local and national regulations relating to:

- Number of smoke detectors and/or fire alarms and their location
- Number of functioning fire extinguishers/hydrants
- Identification and sufficient number of emergency exits (including provision of appropriately designed emergency stairwells on multi-story buildings to support evacuation of personnel)
- Identification of evacuation routes that are clearly marked, have proper lighting, and kept clear and unlocked while employees are present. Provision of training and enforcement for handling of flammable liquids and chemicals
- Procedures to prevent fires during "hot" or intense heat working activities e.g., welding
- What to do in the event of a natural disaster
- What to do if a worker is seriously injured or taken ill

6.2.9 Select workers shall be trained in the details of the Emergency Response Plan and in first aid of electrical shock, profuse bleeding, drowning and other possible medical emergencies. A list of the trained workers shall be available. At least one of the trained workers shall be present at the facility while it is in operation or maintenance.

6.2.10 Emergency evacuation drills (in case of fire, chemical leak or similar) shall be conducted, at a minimum, annually, to include all shifts and floors, and conducted jointly with other occupants in the building. Drills shall be conducted similarly in housing facilities. The frequency of fire and evacuation drills shall be documented and verified.

6.2.11 The facility shall limit worker exposure to sound in excess of 85 dB to less than eight hours a day or as per apply a stricter national standard or provide hearing protection devices to reduce below 85dB.

6.3 Personal Protective Equipment (PPE) and Clothing

6.3.1 The facility shall maintain a list of PPE and a controlled issuance procedure that monitors the proper use of protective equipment and clothing provided to employees, contractors, and visitors.

6.3.2 PPE and hygienic clothing shall be provided free of charge and be properly maintained and replaced as necessary.

6.4 Medical Care

6.4.1 The facility shall provide access to medical care facilities for all workers, including access to or communication with medical authorities in case of emergencies or accidents.

6.4.2 Facilities shall maintain records of medical care provided to individuals at the facility. Records shall remain confidential and be retained for a minimum period of 3-years.

6.4.3 First aid kits shall be clearly marked and be readily available to employees close to work and rest areas and sealed to prevent contamination.

6.4.3.1 The facility shall maintain a list of first aid items kept on hand and, where appropriate, their expiration date and any expired content shall be replaced.

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6.4.4 Facilities shall have in place remediation procedures for individuals injured as a direct result of a workplace accident and who are now not medically capable of conducting their contracted work function.

6.5 Employee Training

6.5.1 The facility shall have documented training for workers, based on their specific roles within the company, in areas that include but are not limited to those identified below. All training shall be overseen by a trained competent authority(s).

6.5.1.1 Machine operator and other dangerous equipment

6.5.1.2 Dangerous chemicals, toxic substances and use and disposal of dangerous materials and clean-up of spills.

6.5.1.3 New employee orientation training in general health, safety, product quality and the prevention of product contamination

6.5.1.4 Fire and electrical emergency prevention and safety

6.5.1.5 Personal hygiene

6.5.1.6 Food safety and Good Manufacturing Processes

6.5.1.7 Refresher training programs

6.5.1.8 Any other area that deemed potentially hazardous or a threat to employee safety

6.5.1.9 Workers have be given training on the facility's grievance mechanism and how to use the complaints process

6.5.2 Training programs shall include specific requirements that monitor, verify, and document the effectiveness of the training, and that training programs are being effectively transferred to the workplace.

6.5.2.1 Records that verify proper training for all elements described above shall be maintained and retained for 3 years.

6.5.3 All training shall be conducted within normal working hours for a worker and at no financial cost to the worker. Where training has to be conducted outside of normal working hours the worker shall be compensated for their time and paid at a premium rate of pay as stated in clause 5.2.3.

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C7 Environmental

7.1 Storage and Disposal of Facility Chemical Supplies

7.1.1 Chemical products, fuels, lubricants, and other non-food grade and/or toxic compounds shall be correctly labeled.

7.1.2 Chemical containers shall only be used to store their designated chemical and shall not be reused.

7.1.3 All chemical products- including fuels, lubricates and other non-food grade and toxic substances shall be securely and safely stored in designated locked containers, or locked storage areas. The containers shall be located in areas that would prevent contamination risks to any other parts of the facility. These areas shall be under control of designated, trained personnel.

7.1.4 All Chemicals shall be stored to prevent mixing that would result in noxious gases, explosions or other worker or food safety hazards. The storage area shall be water-tight and well ventilated.

7.1.5 Fuel, oil and lubricant storage shall include secondary containment areas to contain possible spills and shall be equal to or greater than 110% of the capacity of the storage container used at the facility.

7.1.6 Fuel, lubricant, chemical storage, and maintenance areas shall be marked with warning signs.

7.1.7 The facility shall have in place procedures to prevent and handle any chemical spillages. Equipment and materials for managing and cleaning up spills shall be readily available. Clean up spill kits shall be labeled and periodically inspected for contents and expired products.

7.2 Environmental Waste Management

7.2.1 Sewage from the facility shall be controlled to avoid contamination of the environment, food production areas, employee rest and housing areas, and water supply. It shall be properly treated through a municipal or plant sewer system.

7.2.2 Solid waste in facility production areas and on the facility, grounds shall be properly stored and disposed of according to local and national laws and regulations. Such waste shall be disposed of to avoid, mitigate and/or compensate for negative impacts on the local community.

7.2.2.1 If solid waste by-products will be used as pet food it shall be handled in accordance to pet food regulations.

7.2.3 Used chemical and fuel containers, waste oil, lubricants, and expired chemicals and other waste materials shall either be disposed of in accordance with manufacturer's instructions and local government environmental regulations or be recycled. The facility shall maintain copies of relevant and up to date government regulations.

7.2.4 Where the local government requires a license or permit for the waste storage and disposal activities, the facility shall have a current copy of the plant's or their service provider's permit or license.

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C8 Traceability

8.1 General Requirements

8.1.1 The facility shall operate a traceability record-keeping process that provides timely, organized, accurate entries, performed and overseen be designated trained personnel responsible for collecting data, ensuring it is complete and accurate, and that traceability requirements are met.

8.1.2 Where a facility's traceability system uses an online system or computer database, the facility shall keep copies of the documents or records that were used to transfer the data to the electronic system in order to allow verification of the information in the electronic system.

8.2 Traceability Key Data Elements

8.2.1 The facility shall maintain and provide to the auditor documented records for all production lots/batch that contain the Key Data Elements (KDE) as applicable for each Critical Tracking Event (CTE), for farm raised and for wild-caught species:

General KDE's for both wild and farmed that shall be required are:

- Location Description- where species processed
- Lot/batch number (Traceability Lot Code) TLC
- Storage location
- Shipping
- Receiving
- Unique shipping identifiers – container or seal number, bill of lading
- Receiving customer information – name, address, invoice, or order number
- Breakdown of all species (Transformation) (separately for farm-raised and wild caught)
- Product description- product name, packaging size, and packaging style, scientific species name
- Quantities
- Weight/ sizes
- Input tonnage and total net weight for mass balance calculation

8.2.2 The facility shall maintain production records for all lots or batches that enable the facility to demonstrate lot traceability of all stages of the production process, including rework and outsourced processes. Records shall include the:

- Source and description of the raw material;
- Lot number and quantity of raw material;
- Lot numbers of ingredients and packaging materials used;
- Receiving customer information and;
- Quantity of finished product shipped listed by species.

The results of the trace-forward and trace back exercises must account for 100% of the product and results must be achieved within 4 hours once the SPS auditor selects and assigns the lot.

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8.3 Labeling Controls

8.3.1 Products shall be properly labeled with all information, including allergens, as required by local legislation and legislation of the country of destination. Products shall also supply information to ensure safe handling, storage, preparation, and use of the product along the supply chain or by the consumer.

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Table 1.0 Water Quality Testing Requirements

Test Items	Acceptable Test Methods	GSA-SPS Action Levels **	Units
Heavy Metals/Chemicals	Modified APHA or other internationally recognized and approved methods for water testing		
Aluminum (AL)		0.2	mg/L
Antimony (Sb)		0.005	mg/L
Arsenic (As)		0.01	mg/L
Cadmium (Cd)		0.005	mg/L
Chromium (Cr)		0.05	mg/L
Copper (Cu)		2	mg/L
Lead (Pb)		0.01	mg/L
Manganese (Mn)		0.05	mg/L
Mercury (Hg)		0.001	mg/L
Nickel (Ni)		0.02	mg/L
Selenium (Se)		0.01	mg/L
Microorganisms	Modified APHA cited below or other internationally recognized and approved methods for water testing.		
Coliform	APHA 22nd ed 2012 9222B	0	Per 100mL
E.Coli	APHA 22nd ed 2012 9222G/9222H or 9222I	0	Per 100mL
Total Plate Count	APHA 22nd ed 2012 9215B or 9215C	100	cfu/ml at 22°C

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