A Report On The Possible Development And Implementation Of A Live Reef Food Fish Trade Certification & Accreditation Program.

Author: Peter Scott

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Table of Contents

1 Executive Summary

The live reef food fish trade (LRFFT) has been identified as a serious threat to coral reef ecosystems and biodiversity in the region through impacts arising from the use of destructive fishing practices and overfishing, including targeting of juveniles for growout and within the aquaculture sector, widespread use of inferior husbandry practices along the custody chain.

Despite a concerted effort over the past decade to reduce the social, economic and biological impacts of the LRFFT, it continues to pose major challenges for the future sustainable use of this marine resource. While non-government organisations and regional agencies maintain ongoing LRFFT related programs and continue to make important and effective efforts to address trade concerns, there remains a need for a whole chain-of-custody approach and for innovative programs that support both responsible fisheries capture and the development of sustainable aquaculture through trade and market mechanisms such as codes of conduct, eco-labelling and best-practice certification schemes.

In 2004 following a multi-stakeholder consultation the *International Standard for the Trade in Live Reef Food Fish* was produced setting out principles of best-practice needed to enhance industry sustainability for the LRFFT. The relevance of this work has not diminished since the completion of this project and an opportunity to fully test the Standard 'through to a prototype certification scheme' in a few select locations in the Asia-Pacific would be of great interest and value to many parties. Of particular note would be the financial viability and sustainability of third-party conformity assessment certification schemes as market solutions to the sustainable harvesting of marine resources in Artisinal fisheries such as the LRFFT.

As part of the WWF Coral Triangle Initiative (CTI), a two-year initiative to generate significant reform of the LRFFT has been developed. Within this initiative, a strategic focus will be promoting the development and adoption of "measurable" standards of best-practice through a multi-stakeholder participative process. The assumption has not been made that certification is the final solution for sustainable harvesting of LRF. The deliverables from this contract should include a commentary on the feasibility of strengthening existing 'voluntary' standards further through establishing a prototype certification scheme, tagging into international certification programs such as ISO14001 or making use of existing systems such as the MSC.

Consideration must also be given to the efficacy of a certification program separately for the LRFFT. Points for consideration include; the potential and viability of integrating a certification program for the LRFFT into existing appropriate fisheries certification programs such as the MSC and if so, when and how. For example, a certification program for the LRFFT could operate separately for a time before being migrated into the MSC

where the program would be run under the MSC's own governance. The rationale for this being that the MSC has not yet gained experience of running a certification program that addresses the unique aspects of artisanal/subsistance fishing, aquaculture or the transportation of live fish products

Lessons have also been learned from the Marine Aquarium Council (MAC) certification programme for the marine aquarium trade. Collection and fishing for marine aquarium organisms is very similar to that of the LRFFT and has similar issues such as the use of sodium cyanide and clove oil.

In 2008 the MAC Certification Programme was put one hold due to poor performance of the Partners and financial irregularities. Recently additional funding has been given to MAC by the Packard Foundation to resurrect the programme.

This report discusses the above issues and draws conclusions as to the way 'certification' may be used to maintain the sustainability of the LRFFT.

Benchmarking the LRFFT

As stated before there are 2 main programmes (at this time) that offer certification programmes within the marine fisheries sector these being the Marine Stewardship Council (MSC) and the Marine Aquarium Council (MAC). The MSC has been established for over ten years and MAC for eight and both have still to achieve financial sustainability.

Recently the Packard Foundation has agreed to pour in another $250,000 US for 2009 to see if it can put together a survival plan. Both the MSC and MAC have been 'cash sponges' and sucked up millions of US dollars in funding. More recently the institutional buyers such as Walmart have also funded the MSC.

Due to the decline of MAC, of the many organisations that achieved certification under the MAC Programme only 2 importers remain certified.

The MSC has had its problems too and, although far more professionally run than MAC. A recent report *(Katrina Nakamura, Jim Cannon for the Sustainable Fisheries Partnership 19 September 2008)* on the progress in MSC assessments concluded that:

> *Results of this review provide a snapshot of current progress through the stages of MSC*
> *full assessment over time and in relation to the MSC's commitments on stakeholder*

involvement and transparency in assessment. They reveal issues still outstanding that need to be addressed such as long "dormant" periods in fisheries under full assessment, and especially issues that impact stakeholder consultation: 34% of the assessments currently underway did not report the nomination of assessment teams; 56% did not announce the period of time wherein members of the public are eligible to contribute; and 12% did not post the final scoring tree for public review. This poor compliance leaves these assessments open to criticism in the future.

MSC and MAC differ in several distinct ways in their interaction with fisheries certification. The MSC does not offer any direct capacity building for certification for the fisheries (other than office based technical support) that finally become MSC Certified. Initiallly MAC undertook its own capacity building role but after a few years went into partnership to undertake a major capacity building programme in the Philippines and Indonesia with two partners Reef Check and CCIF. This turned into a mitigating disaster and was unsuccessful in achieving its remit.

MSC's certification program is based upon ISO Guide 65 Accredited Certification to the MSC Principles and Criteria. It is recognised as being a mixture of second and third party certification as the MSC is involved with the certification process at several stages. This interaction is contrary to the requirements of the FAO's Guidelines for Ecolabelling of Fish and Fishery Products from Marine Capture Fisheries.

MAC's certification is based upon ISO 17021 Accredited Certification to the MAC EFM, CFH, HHT and MAM Certification Standards. MAC does not interact with the certification process at all and the original certification process was very sound.

Both MAC and the MSC chose not to undertake fisheries certification directly but to be certifier accreditation and standards writing bodies. In hindsight this decision was probably an error. There is no reason why a specific body (e.g. Live Reef Food Fish Certification Council) cannot be established to perform accredited certification of the LRFFT Chain of Custody if properly regulated to ISO17021 by an accreditation agency such as UKAS from the UK or ANSI from the USA.

The benefit of this approach is that such certification would comply with the FAO Eco-labelling Guidelines and be financially self sustaining as certification is a commercial activity.

There are examples of this type of certification body e.g. The British Approvals Service for Cables (BASEC). BASEC is a recognised sign of assurance of independent cable testing and approval. A non-profit making Government-nominated body, BASEC has for more than 30 years been a mark of reassurance to those specifying electric cables. The leader in product certification services for electrical cables, data and signal cables and ancillary products, BASEC has a reputation for quality, clarity and ensuring safety in cables.

All products are rigorously tested to meet necessary and appropriate British, European and international standards through detailed examination of manufacturers' production processes and controls.

BASEC also provides management system assessment and certification for Quality (ISO 9001), Environmental (ISO 14001) and Health and Safety Management Systems (OHSAS 18001).

There is no reason why the LRFFT could not be serviced by a certification body such as BASEC.

Conclusion

There is no doubt that the involvement of NGO's over the last ten years with certification programmes such as the Forest Stewardship Council (FSC), MSC and MAC has helped to produce good international certification standards through inclusive stakeholder consultation. This NGO involvement though has done little to improve the credibility of certification offered by these programmes and has become more like stakeholder interference at the certification level.

It is time to try a more meaningful meld between NGO interests and conventional 'ISO Type' certification programmes by adopting the 'BASEC type' of certification approach.

The move for the fishing industry globally to embrace international quality management and environmental management such as ISO9001 and ISO14001 was very slow around the year 2000 when the MSC and MAC were formed. This is slowly changing and one 'MAC Importer' already has ISO9001 certification with another planning to achieve ISO9001 and ISO14001 certification by June 2009.

Papua New Guinea is also undertaking trial fisheries for its new marine aquarium trade and has made certification to ISO9001, ISO14001 and OHSAS18001 part of that trial.

The 'new MAC' is also revising its approach to certification and looking at using ISO9001 and ISO14001 as the main certification standards with the old MAC Standards being the criteria by which performance is measured to those standards.

Basically certification practise has moved on over the last few years. ISO certification has become more established with over 1 million organisations now being certified to ISO9001.

It is proposed that any certification programme for the LRFFT follow this trend and that the certification of the members of the chain of custody for the LRFFT be to ISO9001 with the existing International LRFFT Standard being used as the criteria by which performance is measured to that standard.

The role out of such a programme will take time and it is suggested that a BASEC type approach is adopted over a five year period as Figures 1 and 2 below.

Figure 1 - Suggested Progression Of A LRFFT Certification Programme
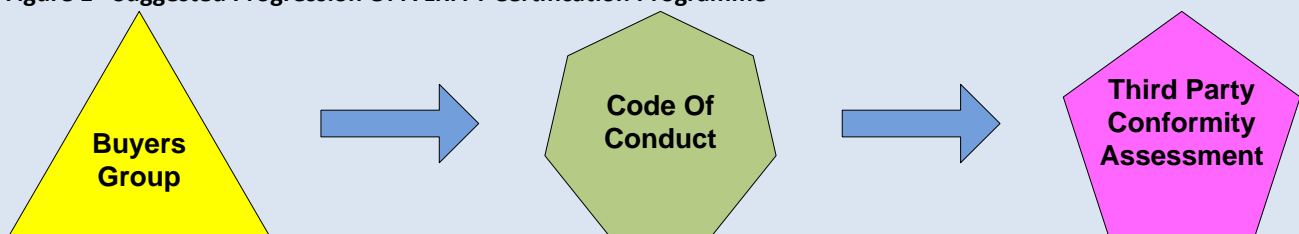
Figure 2-Role Of The LRFFT Certification Over Time

Phase	Role of LRFFTCC	Year 1		Year 2		Year 3	Year 4	Year 5 Onwards
1	Enabling Body							
2	Code Of Conduct Auditing Body							
3	Accredited Certification Body							

Two significant aspect of this approach is that certification will be much cheaper as it can be delivered locally in most cases and not require 'western' certifiers to be used. The proposed LRFFTCC will be self-financing which has not been achieved by MAC or the MSC to date and looks as though will not be in the future.

PART A

2 - A general overview of certification and accreditation programs with respect to the live reef food fish trade:

The basis of any conformity assessment or a certification program is the criteria or standard that is used to demonstrate that an organisation has met the requirements of that programme. Standards have existed since the beginning of recorded history. Some were created by royal decree. For example, King Henry I of England standardized measurement in 1120 AD by instituting the ell, which was equivalent to the length of his arm. Some standards were an outgrowth of man's desire to harmonize his activities with important changes in the environment. Others were created in response to the needs of an increasingly complex society. Put at its simplest, a standard is an agreed, repeatable way of doing something. It is a published document that contains a technical specification or other precise criteria designed to be used consistently as a rule, guideline, or definition.

Standards are designed for voluntary use and do not impose any regulations. However, laws and regulations may refer to certain standards and make compliance with them compulsory. For example, the physical characteristics and format of credit cards is set out in standard number IEC 7810:1996. Adhering to this standard means that these cards can be used worldwide.

If certification is to be used as a mechanism for the live reef food fish trade, that certification program must be credible and based upon current conformity assessment techniques.

The criteria or standard used within a certification program is dependent upon the type of programme that verifies that an organisation is compliant with the requirements of that programme. Conformity assessment programs fall into one of three categories these being first, second or third party evaluations. The benefits of each type of conformity assessment programme are illustrated in the following table.

Table 1 - Conformity Assessment Types

Type of programme	Performed by	Credibility
First party (internal)	Carried out with in an organisation by its own personnel	The least credible of audit has undertaken by the organisation itself
Second party (customer)	Performed by or on the half of a customer	This can be credible but the criteria requirements are often compromised by the need to the product quickly
Third-party (external)	Performed by a certification body or regulatory authority	The most credible type of audit has undertaken by an independent body

The most common type of conformity assessment programme is the third party type as this is also the most credible. Third partyconformity assessment can be further broken down as illustrated in the following table. This table illustrates the type of third party evaluation body, the activity that they are involved in and the appropriate international standard that prescribes that manner in which that activity shall be performed.

Table 2 - Types of Third Party Evaluation Body

Type of Body	Activity - Examples	ISO Accreditation Standard
Management System Certification Body	Performing management system certification to standards such as ISO9001 and ISO14001	ISO/IEC 17021:2006 - Conformity assessment - Requirements for bodies providing audit and certification of management systems
Product Certification Body	Performing product certification for producst ranging from condoms to christmas tree lights to marine capture fishieries e.g. Marine Stewardship Council.	ISO/IEC Guide 65:1996 - General requirements for bodies operating product certification systems
Inspection Body	Performed by a certification body or regulatory authority	ISO/IEC 17020:1998 - General criteria for the operation of various types of bodies performing inspection
Test laboratory	Calibration of instruments and the performance of mechanical & electrical tests etc.	ISO/IEC 17025:2005 General requirements for the competence of testing and calibration laboratories
Personnel	Personnel competence organisations – e.g. The UK's Institution of Railway Signal Engineers	ISO/IEC 17024:2003 Conformity assessment - General requirements for bodies operating certification of persons

Having chosen the appropriate type of conformity assessment programme and the type of third-party evaluation body that will operate that programme, is that it is important to demonstrate that the programme is credible. This is achieved by submitting the evaluation body to independent assessment by what is called an accreditation agency.

Accredited Evaluation

Usually the reason for getting something independently evaluated is to confirm it meets specific requirements in order to reduce risks. Obvious examples are product failure, health risks, company reputation or to meet legal or customer requirements. Anything or anyone can be evaluated - products, equipment, people, management systems or organisations.

Accreditation by an independent agency such as the United Kingdom Accreditation Services in the UK or the American National Standards Institute in the USA means that evaluators i.e. testing and calibration laboratories, certification and inspection bodies have been assessed against internationally recognised standards to demonstrate their competence, impartiality and performance capability.

It is the ability to distinguish between a proven, competent evaluator that ensures that the selection of a laboratory, certification or inspection body is an informed choice and not a gamble. UKAS or ANSI accreditation means the evaluator can show to its customer and stakeholders that it has been successful at meeting the requirements of international accreditation standards.

This then means that the customer reduces the risk of selecting an incompetent evaluator and paying for, or more seriously, acting upon invalid results.

There follows three figures depicting the types of evaluator accreditation.

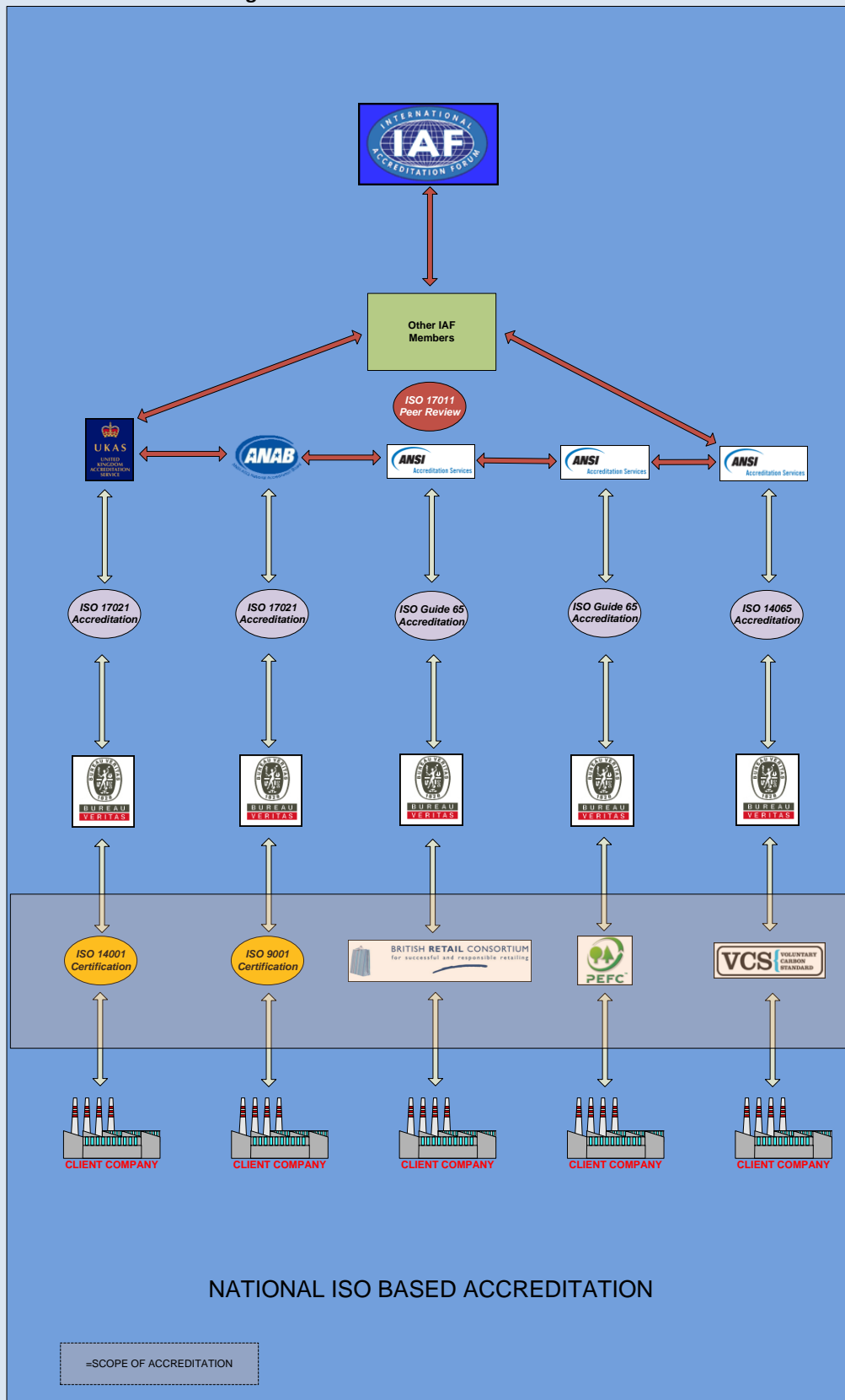**Figure 3 - National Based ISO Accreditation**

NATIONAL ISO BASED ACCREDITATION

=SCOPE OF ACCREDITATION

Figure 4 - International Based ISO Accreditation

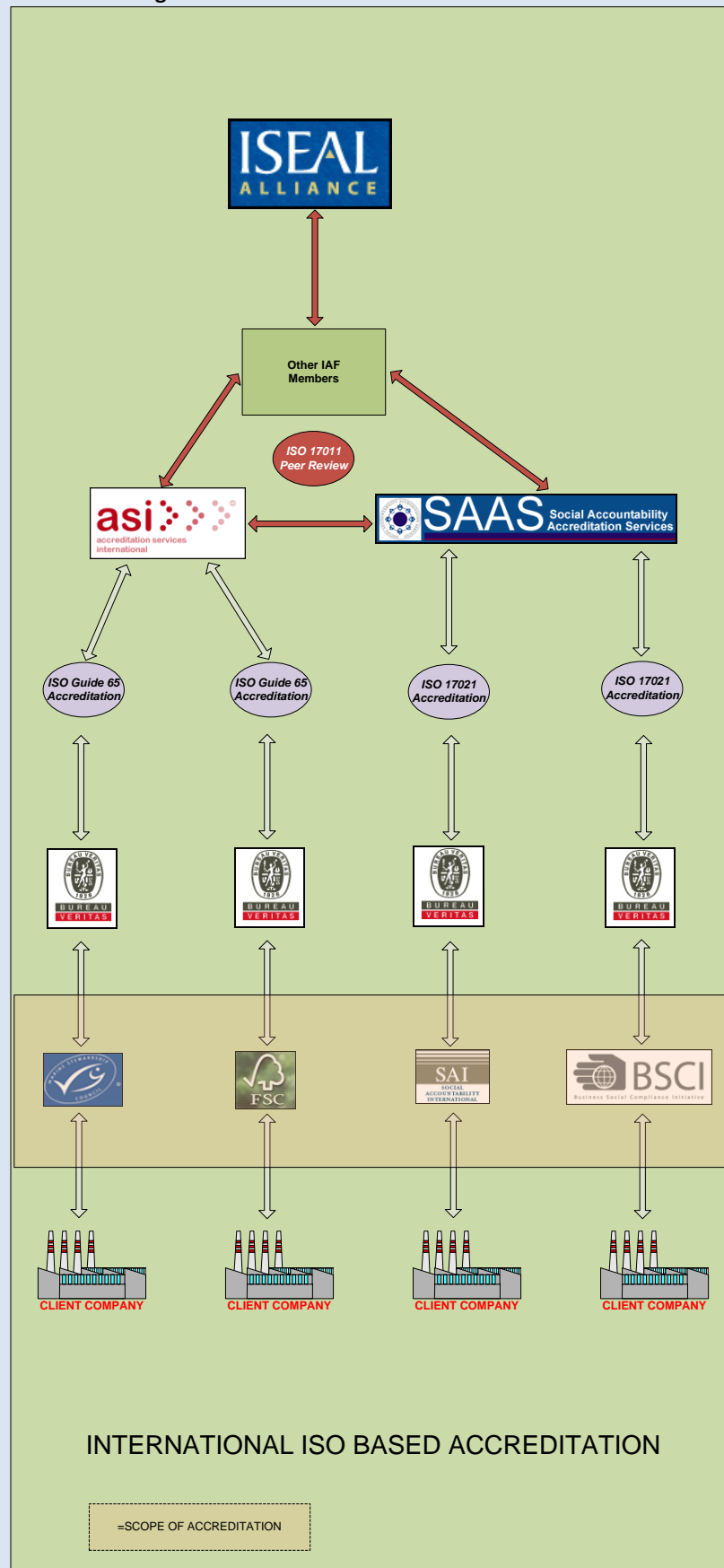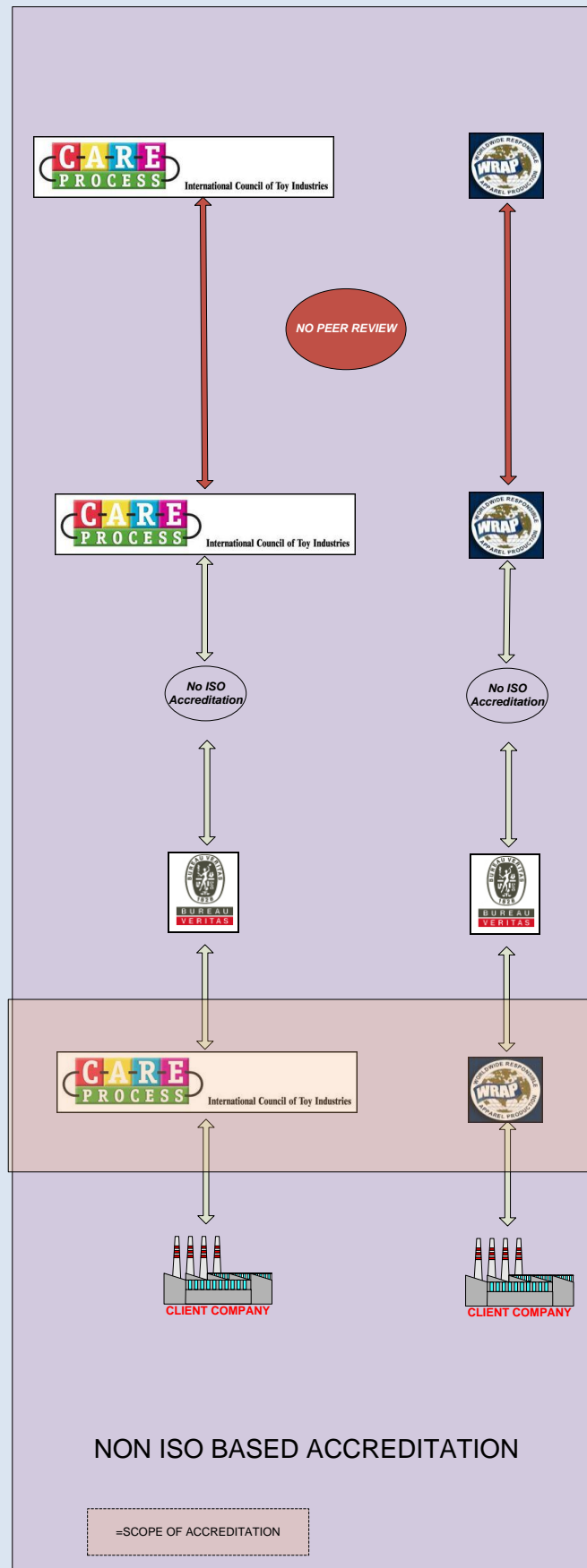**Figure 5 - Non-ISO Based Accreditation**

NON ISO BASED ACCREDITATION

=SCOPE OF ACCREDITATION

3 Current relevant first, second and third party conformity assessment program standards, codes of conduct, principles and criteria to ascertain the best method of presenting the compliance criteria of the LRFFT.

Conformity assessment criteria

Main stream management system certification programs such as those that deliver ISO 9001 certification are based upon internationally agreed standards produced by the International Organisation for Standardisation (ISO). These standards take many years to produce and tend to be of a generic nature that can be applied to any sector.

In recent years other certification programs have appeared that are issues based (e.g.sustainable fisheries, sustainable forestry). These programs use requirements documented such as Principles and Criteria, Codes of Conduct, Inspection Procedures and Product Standards.

These programs are also based around an on product logo scheme that demonstrates to end consumers that the e.g. wood, fish or toys purchased by them meet the appropriate certification/inspection criteria. This enables consumers to base their choice of purchase in favour of producers that comply with these standards or codes of practice in preference to those that do not. A well-known example of an on product logo scheme such as this is the Earth Island Institute's Dolphin Friendly Tuna Programme.

Examples of similar schemes are illustrated in the following table.   This table also shows an approximation as to whether the programme is considered as a second or third party programme and the type of criteria used for the programme.

Table 3 - Certification Programs Comparison

Organisation	Mission	Second or Third Party Program & Criteria
	The MSC is an independent, global, non-profit organisation whose role is to recognise, via a certification programme, well-managed fisheries and to harness consumer preference for seafood products bearing the MSC label of approval.	The involvement of the MSC in this programme makes it sit between a second and third party accredited certification programme. *MSC Principles and Criteria*
Organisation	Mission	Second or Third Party Program & Criteria

	MAC's mission is to conserve coral reefs and other marine ecosystems by creating standards and certification for those engaged in the collection and care of ornamental marine life from reef to aquarium.	Third Party *Initially the MAC EFM, CFH, HHT & MAM Standards. Now looking towards ISO9001 with additional criteria.*
	FSC Forest Management (FM) certification is a voluntary process for verifying responsible forest practices in all type of forests and plantations. FSC FM certification is based on internationally accepted FSC Principles and Criteria.	Third Party *FSC Principles and Criteria*
	WRAP is an independent, non-profit organization dedicated to the certification of lawful, humane and ethical manufacturing throughout the world.	Second Party *Code of Conduct*
	The CFP is an independent voluntary organization that has identified the essential components of a nationally recognized Food Protection Manager Certification Program. The CFP has established a mechanism to determine if certification organizations meet these standards.	Second Party *Standards*
	CATG is approved by United Kingdom Assessment Service and the United Kingdom Timber Grading Committee as a certification body for the examination and certification of all timber grading schemes.	Third Party *Standards*
	Earth Island Institute monitors tuna companies around the world to ensure the tuna is caught by methods that do not harm dolphins and protect the marine ecosystem. Our standards prevent harm to dolphins and are adhered to by more than 90% of the world's tuna companies.	Second Party *Code of Conduct*

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Scope, unit of certification and certification claim

The certification program most relevant and perhaps similar to that required by the LRFFT is that of the Marine Stewardship Council. The MSC certifies fisheries around the world as being environmentally sustainable. This though is a very narrow focus or certification claim.

The following figure shows most of the general issues surrounding a fishery. As can be seen from that table the MSC Principles and Criteria and MSC Chain of Custody Criteria only cover about 25% of the issues that consumers are concerned with in respect to fishing. So the claim that can be made by an MSC certified fishery does not cover quality or environmental management issues, food safety, social accountability, social equity or ethical fishing.

This means that fishermen and fishing companies certified by the MSC to their Principles and Criteria can also participate in activities such as the Canadian seal hunt as there are no ethical requirements placed upon these fishermen or fishing companies with respect to other activities that they are involved with.

Figure 6 – MSC Certification Scope

Certification Aspect		Sustainable Harvesting	Product Traceability	Quality Management	Environmental Management	Food Safety	Social Accountability	Social Equity	Ethical Fishing
Certification Program		*MSC Principles & Criteria*	*MSC Chain of Custody*	*ISO9001*	*ISO14001*	*ISO22000*	*SA8000*	*Fair Trade*	*ESP*
Unit of Certification	Fish Stocks	green	red	red	orange	red	red	red	red
	Fishing Vessel	green	orange	red	green	red	red	red	red
	Fisher	green	orange	red	red	red	red	red	red
	Wholesaler	red	green	red	red	red	red	red	red
	Processing Plant	red	green	red	red	red	red	red	red
	Retailer e.g. Supermarket	red	green	red	red	red	red	red	red

KEY:		
green	=covers in detail	
orange	=covers partially	
red	=Does not cover	

LRFFT 'Certification Criteria'

It is suggested that the role of a Live Reef Food Fish Certification Programmme (LRFFTCP) is to provide consumers with a mechanism for demonstrating that the fish that they buy as well as coming from a sustainable resource also come from members of the trade that embrace quality, environmental management issues, food safety, social accountability, social equity and ethical fishing.

Rather than trying to name and shame those fishing companies or fishermen that are involved in bad practises such as the use of cyanide in the capture of LRFF, it is suggested those fishing companies and

fishermen that use good practises are positively rewarded to indicate such. This reward it is intended would be by the use of a certification logo.

Rather than re-inventing the wheel the existing International LRFFT Standard should first be used as the basis for Code Of Conduct Criteria and then as a basis for assessment criteria for ISO9001 certification.

PART B

4 Comparing The Certifiability & Rigor Of LRFFT Related Certification Standards

The following standards were reviewed for their:

Interrelation among consumers and/ or institutions

Comparison against international guidance for standards production (ISO Guide 72, ISO/ IEC Part 2, ISEAL Code Of Conduct)

Comparison to the FAOs Guidelines for Ecolabelling of Fish and Fishery Products from Marine Capture Fisheries

- The International Standard for the Trade in Live Reef Food Fish (TLRFF)

- Marine Steward Council (MSC) Principles and Criteria and the MSC's Risk-based approach to certification of data-limited fisheries

- Marine Aquarium Council (MAC) Standards

- The Global Aquaculture Alliance Scheme (GAAS)

- ISO 9001: 2008 – Quality Management System (QMS)

- ISO14001: 2004 – Environmental Management System (EMS)

- Friends of the Sea Farmed Products Certification Criteria

The International Standard for the Trade in Live Reef Food Fish (TLRFF)

Interrelation among consumers and/ or institutions

The Standard does not specifically indicate the responsible stakeholder specific for the provision (see 1.2.4 on stakeholder involvement). It is general and vague in terms who will specifically seek cooperation of stakeholders.

It provides for specific provisions on development on new fisheries and management requirements. It is however seventy-five (75%) substantial on part of the Supply Side and the remaining on the Demand Side.

The provisions contained in the demand side are not as comprehensive as that of the MAC Standard which is composed of three separate parts

Salient aspects stated in the Demand Side covers provisions on holding time, drug and use, handling techniques, declaration of fish health and traceability.

A provision is contained on the encouragement of consumers to purchase and consume fish in accordance to the TLRFF Standard. It does not however contain provision on education of consumers how will they will be able to identify if the good purchased is conforming to the Standard, e.g. guarantee seal or logo.

There is no provision on the action to be taken in cases of nonconformity e.g. corrective action in cases of cyanide detection, spoilage, etc.

Comparison With ISO Guide 72, ISO/ IEC Part 2, ISEAL Code Of Conduct

ISEAL - The TLRFF provisions on compliance with existing authorities (1.2.2, 2.2.3, 3.1.3) are complementary on ISEAL's account of regulatory and market needs (6.2)

The TLRFF is also strong in its aspects on stakeholders involvement (1.2.3, 1.2.4 and 1.2.5) with ISEALs elements on interested parties' opportunity to comment on terms of reference (5.2), and public review of development of standard of at least two (2) rounds of comment submissions (5.4) and comments received from thereof (5.5). It also stresses on pursuit for consensus among balance of interested parties (5.6)

Socioeconomic, gender and poverty issues in TLRFF (1.2.5) are also reflected in ISEAL's social, environmental and/ or economic objectives (6.1).

TLRFF also contains provisions on periodic resource assessments (2.2.5) in parallel with ISEAL's provision on review of standard on periodic basis to ensure continuing effectiveness.

A definition of terms is appended at the TLRFF for further clarity (ISEAL Part 5)

Management and operational requirements are also contained in the TLRFF

FAO's Guidelines for Ecolabelling of Fish and Fishery Products from Marine Capture Fisheries

TLRFF objectives set forth in 1.2 are complementary with that of GEFFP principles specifically on consistency on UN Convention on the Law of the Sea, etc and recognition of sovereign rights of States to comply with all relevant laws and regulations (2.1, 2.4)

The TLRFF is also reflective of GEFFPs provision on transparency, balance and fair presentation of all interested parties (2.4)

The TLRFF does not specify provision that it is market driven and voluntary in nature (GEFFP 2.3). It is also not explicit on non-creation of unnecessary obstacles to trade and allow for fair trade and competition and opportunity to international markets (GEFFP 2.5, 2.6)

Although the TLRFF contains operational and management requirements, it does not specify the incorporation of reliable, independent auditing and verification procedures.

Likewise the GEFFP is more comprehensive on its guidelines for setting standards pf sustainable fisheries, accreditation and certification.

Corollary to this, the TLRFF does not specify requirements for use and control of a certification claim, symbol or logo (GEFFP 141-146)

Marine Steward Council (MSC) Principles and Criteria and the MSC's new risk-based approach to certification of data-limited fisheries

Interrelation among consumers and/ or institutions

The MSC Principles are used as a standard for third party, independent and voluntary certification programme. The Standard is geared towards the goals of conservation and sustainable use of marine resources taking into account full cooperation of fisheries stakeholders including those dependent on fishing for food and livelihood.

Major benefactor of this Standard will be the consumers who will have to select marine products with the confidence that they come from sustainable and well-managed sources. Likewise fish processors, traders and retailers will be encouraged to make public commitments to purchase fish products only from certified sources that will eventually benefit from the assurance of continuity of future supply.

It will also benefit the fishers and fishing industry that depends on the abundance of fish stocks, by providing market incentives to work towards sustainable practices.

Comparison With ISO Guide 72, ISO/ IEC Part 2, ISEAL Code Of Conduct

ISEAL - As to stakeholders involvement in the ISEAL (5.2, 5.4, 5.5, 5.6 and 7.1), the MSC Principles are emphatic on the major stakeholder – the consumers in general and those involved in the fishery. The MSC Principles are very particular on sustainability fisheries in account with compliance on applicable local and national laws and standards.

The Management System Criteria in MSC Principle 3 also underscore the cultural as well as customary rights and socio-economic aspects of those dependent on fishing for food and livelihood (ISEAL 6.1)

ISO Guide 72 - As to Guide 72's General Principles on market relevance, the MSC Principles are very particular on its market clientele – consumers of fishery products obtained from sustainable sources.

The Design Application in Guide 72 which purports to ensure that the intention of the Standard is maintained is also contained in the MSC Principles especially in the identification of users and the scope of field of application. The MSC Principles apply to wild capture fisheries. Its exclusions are properly identified as well (aquaculture and harvest of other species).

Common elements in ISO Guide 72 are policy, planning, implementation and operation, performance assessment, improvement and management review. The MSC Principles are strong on policy and principles and on the implementation and operation. It also incorporates planning and control strategies on the degree of exploitation of the resource. It has established mechanisms on the rebuilding and recovery of depleted fish populations. It is however weak on performance assessment like the conduct of analysis and handling nonconformities and system or operational audits. The criteria of the MSC Principles will also be revised as appropriate in light with relevant new information and technologies and consultation.

ISO/ IEC Part 2 - The MSC Principles and Criteria for Sustainable Fishing are used as a standard in a third party, independent and voluntary certification programme.

On the word semantics, here are the comments:

On Principle 1:

A fishery must be conducted in a manner…

On Principle 2:

Fishing operations should allow for the maintenance…

On Principle 2:

The fishery is subject to an effective management…

According to ISO/ IEC Part 2
(Annex H – Normative) verbal forms for the expression of provisions – a requirement renders the statement with 'shall' or 'shall not'. Do not use 'must' as an alternative for 'shall'. This will avoid any confusion between the requirements of a document and external statutory obligation.

As such the Principles should be phrased as:

A fishery <u>shall</u> be conducted in a manner…

Fishing operations <u>shall</u> allow for the maintenance…

The fishery <u>shall be subjected</u> to an effective management…

FAO's Guidelines for Ecolabelling of Fish and Fishery Products from Marine Capture Fisheries - Both Principles and Guidelines exhibit commonalities on consistency on compliance to applicable laws and regulations and standards and pursuit for effective mechanisms in the fisheries trade. The GEFFP is however more emphatic on fair trade and competition and opportunity for entry in the international markets as well as clear accountability on owner of the schemes.

The MSC Principles contain provisions on specific fishery operations as to aspects of non depletion of exploited populations, diversity of the ecosystem and its habitat, and an effective management system incorporating the institutional and operational frameworks of sustainable fisheries.

The GEFFP however is more concentrated on the procedural and institutional aspects of setting standards of sustainable fisheries and its guidelines for accreditation and certification.

The structure of the MSC Certification Programme with the MSC requiring a hands on role in places is in conflict with the GEFFP.

Marine Aquarium Council (MAC) Standards

Interrelation among consumers and/ or institutions - The main consumers for the MAC Standard is the thousand of fishers in coastal communities around the world in which the marine aquarium trade represents a valuable source of income for exporting countries and the end hobbyist i.e. the complete chain from reef to retail.

The MAC Standards address the complete chain of custody from the collector, exporter, importer to the retailer.

The goal of MAC Certified operators is to achieve compliance with the mortality requirements of the Standard more consistently for a greater number of species batches more often through consistent and significant improvement.

The MAC Standards are international performance standards prepared under the direction of the MAC Standards Committee. They are subject to a broad and inclusive stakeholder review and consultation process within and outside the marine aquarium sector.

Comparison With ISO Guide 72, ISO/ IEC Part 2, ISEAL Code Of Conduct

ISEAL - The MAC Standards are complementary to the ISEAL's provisions on stakeholders involvement in the development of the Standard (5.2, 5.4, 5.5, 5.6 and 7.1).

MAC has worked with stakeholders to develop the Standards and in their implementation phases.

It is corollary as well on the ISEAL's provision on the prompt publication of approved standards (5.7). The Core Standard Interpretation document will come intro effect on the publication date indicated on this document and be in effect during the MAC Certification Development Phase determined by the MAC Board.

As per ISEAL, there should be harmonization of standards and contribution to its elaboration (6.7 and 7.2).

The MAC Standard is composed of three (3) Sections: Ecosystem and Fishery Management (EFM) Standard, Collection, Fishing and Holding (CFH) Standard; and Handling, Husbandry, and Transport (HHT) Standard.

The MAC Standard has some attachments also for its further elaboration e.g. Maintenance of Traceability Overview, Overview of Mortality Record Keeping Requirements, and Supplier Shipment Performance Record.

On ISO/ IEC Guide 72 - As per requirements of ISO/ IEC Guide 72 on Human Resources where composition of drafting groups shall be experts in subject field and standard writing, the MAC Standards were prepared by several rounds of review and revision by an international, multi-stakeholder Standard Advisory Group (SAG).

The draft Core Standards were then made available for public review and revised based on the feedback received, followed by a final review and revision by the SAG.

FAO's Guidelines for Ecolabelling of Fish and Fishery Products from Marine Capture Fisheries

Both Standard and Guidelines are to be used on a global basis for third party certification. GEFFP however refers to ecolabelling schemes that are designed to certify and promote labels for products from well-managed marine capture fisheries and focus on issues related to sustainable use of fisheries resources. The MAC Standards however refers to certification of the marine aquarium trade.

Both are also the same in principles of sustainable use. The MAC Standard is more emphatic on the controlled conditions of collection and fishing activities.

The GEFFP is more management system-driven on aspects of substantive requirements and criteria for ecolabels. The MAC Standard on the other hand is plainer in the components in the collection area management plan and is subject for periodic audit and review. Stakeholder communication is also demonstrated.

While the GEFFP lays provisions on guidelines for setting standard for sustainable fisheries, accreditation and certification, the MAC Standard has specific provisions on order instruction requirements, compliance with applicable laws, training and competence of personnel, control of collection, control of nonconformity and requirements for holding, handling and husbandry.

It also has provision on contract and order documentation, traceability, identification and acclimatization of certified marine aquarium organisms, mortality records.

The Global Aquaculture Alliance Scheme (GAAS)

Interrelation among consumers and/ or institutions

The Best Aquaculture Practices (BAP) under the auspices of Global Aquaculture Alliance (GAA) promote the responsible practices throughout the aquaculture industry for the quantitative evaluation of production and management practices throughout the aquaculture production and distribution process.

The BAP address environmental and social responsibility, animal welfare, food safety and traceability in a voluntary certification program.

BAP's objective is to drive continued industry wide improvements by setting high standards that deliver significant benefits while representing realistic objectives for the majority of aquaculture operators.

The BAP standards and certification procedures are in consonance with other relevant international guidelines for aquaculture certification programs, e.g. UN Food and Agriculture Organization Guidelines for Aquaculture Certification, and the International Social and Environmental Accreditation and Labeling Alliance (ISEAL) Code of Good Practice for Setting Social and Environmental Standards.

Comparison With ISO Guide 72, ISO/ IEC Part 2, ISEAL Code Of Conduct

ISEAL - BAP is complementary to the ISEAL's provisions on stakeholders involvement in the development of the Standard (5.2, 5.4, 5.5, 5.6 and 7.1).

In order to promote broad stakeholder involvement, consensus and transparency in the development of BAP, the GAA has delegated to a Standard Oversight Committee (SOC) the primary oversight for the process. Its members represent one-third industry, one-third nongovernmental conservation and social justice organizations and one-third academic and regulatory interests.

The diverse composition of the SOC and the BAP Technical Committees provides broad technical and stakeholder representation. GAA's BAP Standard Coordinator works with all committees in a coordinating role within the standards development process.

ISO Guide 72: 2001 - asserts that the success of any MSS project will depend to a large extent n the composition of drafting groups consists of both experts in subject field and standards writing. (7.2.3.2)

Compliance with BAP Standards is determined by evaluators accredited by the Aquaculture Certification Council, Inc. (ACC) who are equipped with relevant knowledge, experience and credentials.

Committee chairpersons are evaluated by the BAP Standards Coordinator and approved by the SOC based on their technical expertise, leadership experience, and communication skills.

Design specification by ISO Guide 72: 2001 states the compatibility within MSS families (7.2.2). The BAP standards process is consistent with relevant FAO and ISEAL guidelines.

Transparency of the MSS development process (ISO Guide 72: 2001 - 7.2.4) is ensured for the possibilities of participation in the process of developing standards. The BAP Standard is ensured that the overall process, including procedures and upcoming pubic input opportunities, is made transparent to the public through the GAA or BAP website. The SOC will also develop a formal public appeals process.

FAO's Guidelines for Ecolabelling of Fish and Fishery Products from Marine Capture Fisheries

The dichotomy between the GEEFP and BAP is that the former is concerned on labels for products from well-managed marine capture fisheries while the latter is on aquaculture production and distribution process.

The GEEFP is in minimum subscription as to its principles in the 1982 UN Convention on the Law of the Sea and FAO Code of Conduct for Responsible Fisheries and the World Trade Organization.

The BAP on one hand is in minimum subscription to UN Food and Agriculture Organization Guidelines for Aquaculture Certification, and the International Social and Environmental Accreditation and Labeling Alliance (ISEAL) Code of Good Practice for Setting Social and Environmental Standards.

GEFFP is a compendium of procedural guidelines presented in three parts: Guidelines for Setting Standards of Sustainable Fisheries, Guidelines for Accreditation and Guidelines for Certification.

BAP specifies provisions on Standards Development by providing quantitative metrics and auditing procedures. By defining acceptable materials, methods, processes and identifying appropriate performance metrics and targets, they directly address food safety, environmental and social concerns, animal welfare and product traceability.

ISO 9001: 2008 – Quality Management System (QMS)

Interrelation among consumers and/ or institutions

This International Standard which specifies generic requirements for any organization of any type or size which need to demonstrate its ability to consistently provide product that meet customer requirements and applicable regulatory requirements and aims to enhance customer satisfaction through the effective application of the system, including processes for continual improvement of the system and the assurance of the conformity to customer and applicable regulatory requirements.

Monitoring of customer satisfaction requires the evaluation of information relating to customer perception as to whether the organization has met customer requirements.

This Standard can be used by external and internal parties, including certification bodies, to asses the organization's ability to meet customer, regulatory and organization's own requirements.

Comparison With ISO Guide 72, ISO/ IEC Part 2, ISEAL Code Of Conduct

ISEAL - Unlike ISEAL which states the application of the Code in its entirety (ISEAL 4.1), an organization may claim for exclusion in ISO 9001: 2008 but is only limited to clause 7 (product realization) provided also that such exclusions do not affect the organization's ability or responsibility, to provide product that meets customer and applicable regulatory requirements.

The ISEAL is driven by stakeholders involvement in the development of the Standard while the ISO 9001: 2008 does not explicitly point any stakeholder involvement except that of supplier – organization – customer. Administrative aspects are also contained at the ISEAL (5.11) while the ISO 9001: 2008 do not contain provisions to such.

ISO Guide 72 - The General Principles of ISO Guide 72 state that a management system standard should be compatible between various MSSs. The ISO 9001: 2008 has been aligned with ISO 14001: 2004 in order to enhance the compatibility of the two standards for the benefit of the user community. It is possible for an organization to adapt its existing management system (s) in order to establish a quality management system that complies with the requirements of the ISO 9001: 2008.

Common elements of an MSS as per ISO Guide 72 include policy, planning, implementation and operation, performance assessment, improvement and management review. This is also enshrined in ISO 9001: 2008 in its Plan-Do-Check-Act (PDCA).

ISO/ IEC Directives, Part 2 - In comparison all provisions contained in ISO 9001: 2008 are in conformance to ISO/ IEC Directives, Part 2, i.e. on General Principles (objective, performance approach, homogeneity, consistency of documents, equivalence of official language versions etc.

When it comes to verbal forms for the expression of provisions (Annex H - ISO/ IEC Directives, Part 2), ISO 9001: 2008 is all encompassing to be in conformity with this, as in the case of the use of *shall* and *shall not* which is mandatory (requirement).

FAO's Guidelines for Ecolabelling of Fish and Fishery Products from Marine Capture Fisheries

The GEFFP is more particular on principles of the ecolabelling schemes than that of the ISO 9001: 2008 which is more management system concept.

ISO 9001: 2008 is also the Standard for third party certification of a QMS while GEFFP is a compendium of procedural guidelines presented in three parts: Guidelines for Setting Standards of Sustainable Fisheries, Guidelines for Accreditation and Guidelines for Certification.

Guidelines for Setting Standards of Sustainable Fisheries comprise quantitative and qualitative indicators of the governance system or management regime. Accreditation provides assurance that certification bodies responsible for conducting conformity assessment with sustainability standards and chain of custody requirements in fisheries. Certification is the procedure by which a third party gives written or equivalent assurance that t a fishery conforms with the relevant standard and that a proper chain of custody is in place.

ISO14001: 2004 – Environmental Management System (EMS)

Interrelation among consumers and/ or institutions

This Standard is user friendly and can be used by any organization to demonstrate its sound environmental performance. The Standard also accommodates diverse geographical, cultural and social conditions.

The market is driven customers who prefer goods and services manufactured with increased environmental concern.

One of the prime institutions involved in the Standard is the governing authority of the organization. The Standard is emphatic on legal requirements and other regulations. However the Standard does not intend to create non tariff trade barriers or to increase or change an organization's legal obligations.

Society in general especially those directly impacted by the organization's activities and processes, is the ultimate stakeholder for the Standard since the goal of the Standard is environmental protection and prevention of pollution in balance with socio-economic needs.

Comparison With ISO Guide 72, ISO/ IEC Part 2, ISEAL Code Of Conduct

ISEAL – code of conduct is applied on its entirety. The ISO 14001: 2004 Standard contains only those requirements that can be objectively audited and does not establish absolute requirements for environmental performance beyond the commitments in the environmental policy, to comply with applicable legal requirements, to prevention of pollution and continual improvement.

While the ISEAL is very emphatic on stakeholder involvement in the development of Standard, the ISO 14001: 2004 is very generic on its terms for its stakeholders – legal requirements do not necessarily mean for those laws but as well international protocol, national conventions and local and customary requirements.

ISO/ IEC Guide 72 - common elements of an MSS as per ISO Guide 72 include policy, planning, implementation and operation, performance assessment, improvement and management review. This is also enshrined in ISO 14001: 2004 in its Plan-Do-Check-Act (PDCA).

On ISO/ IEC Directives, Part 2 - in comparison all provisions contained in ISO 14001: 2004 are in conformance to ISO/ IEC Directives, Part 2, i.e. on General Principles (objective, performance approach, homogeneity, consistency of documents, equivalence of official language versions etc.

When it comes to verbal forms for the expression of provisions (Annex H - ISO/ IEC Directives, Part 2), ISO 14001: 2004 is all encompassing to be in conformity with this, as in the case of the use of *shall* and *shall not* which is mandatory (requirement).

FAO's Guidelines for Ecolabelling of Fish and Fishery Products from Marine Capture Fisheries

The GEFFP is guidelines for ecolabelling schemes that are designed to certify and promote labels for products from well-managed marine capture fisheries and focus on issues related to sustainable use of fisheries resources. The ISO 14001: 2004 is a Standard with the overall aim of environmental protection and prevention of pollution in balance with socio-economic needs. Users of this Standard are concern over interested parties' stake about environmental matters and sustainable development.

The GEFFP is more specific on its users – the fisheries industries while the ISO 14001: 2004 is environmental protection in general terms.

Friend of the Sea - Farmed Products Certification Criteria

Interrelation among consumers and/ or institutions

The major concern of the Friend of the Sea Approved Fisheries are target stocks which are not overexploited, use fishing methods which don't impact the seabed and generate less than average (8%) discards.

Friend of the Sea Approved Aquaculture Farms are not to impact critical habitats; use feeds from trimmings or from Friend of the Sea approved fisheries; don't use GMO, chemicals, antifouling paints; apply measures to eliminate escapes and other marine animals and seabirds bycatches; limit and properly manage emissions.

Consumers are assured that products are audited and certified by accredited third party certifiers, according to FAO GUIDELINES. A list of approved fisheries and certified products is available for retail chains, producers and consumers.

Comparison With ISO Guide 72, ISO/ IEC Part 2, ISEAL Code Of Conduct

ISEAL - is more concerned on stakeholders' involvement in the development process of the Standards while the Friend of the Sea is anchored on the thirteen (13) principles and are classified in three (3) levels of importance: essential, important and recommended.

ISO/ IEC Guide 72 - common elements of ISO/ IEC Guide 72 are anchored on policy, planning, implementation and operation, performance assessment, improvement and management review. The Friend of the Sea is more specific on implementation and operation as well as planning. There is not provision for performance assessment and improvement and management review.

FAO's Guidelines for Ecolabelling of Fish and Fishery Products from Marine Capture Fisheries

The GEFFP is guidelines for ecolabelling schemes that are designed to certify and promote labels for products from well-managed marine capture fisheries and focus on issues related to sustainable use of fisheries resources.

The Friend of the Sea on the other hand is anchored on 13 strict and specific criteria:

Summary

The following table attempts to summarize the above comparisons.

Table 4 - Summary Of Fishery Standard Comparisons

Standard	Easy to certify consistently to the standard	ISO Guide 72	ISO/IEC Part 2	ISEAL Code Of Conduct	FAO's Guidelines for Ecolabelling of Fish and Fishery Products from Marine Capture Fisheries
The International Standard for the Trade in Live Reef Food Fish (TLRFF)	Clear & Simple	(Good)	(Very Good)	(Excellent)	(Excellent)
Marine Steward Council (MSC) Principles and Criteria & MSC's Risk-based approach to	Complex system	(Basic)	(Very Good)	(Excellent)	Does NOT comply with full third party independence
Marine Aquarium Council (MAC) Standards	Clear & Simple	(Very Good)			
The Global Aquaculture Alliance Scheme (GAAS)	Simple	(Basic)			Does NOT comply with full third party independence
ISO 9001: 2008 – Quality Management System (QMS)	Clear & Simple	(Excellent)		ISEAL criteria is based on ISO	(Very Good)
ISO14001: 2004 – Environmental Management System (EMS)	Clear & Simple	(Excellent)		ISEAL criteria is based on ISO	(Very Good)
Friends of the Sea Farmed Products Certification Criteria	Simple	(Poor)	(Good)	(Basic)	Does NOT comply with full third party independence

KEY	
Excellent=	(green)
Very Good=	(purple)
Good=	(blue)
Basic=	(yellow)
Poor=	(red)

As can be seen a meld of the existing International LRFFT Standard and ISO9001 and ISO14001 appears to be the most credible basis for a LRFFT Certification Standard.

PART C

6 A proposed framework for how to move forward with a certification and labelling of LRFF fisheries:

Confidence in the Program

The overall aim of a LRFFTCP must be to give confidence to all parties that its program fulfils the specified requirements. The value of a LRFFTCP program is the degree of public confidence and trust that is established by its impartial operations and competentence. Parties that have an interest in LRFFTCP program include, but are not limited to

a)   Non Governmental Organisations

b)   Fishermans Organisations

c)   Government Agencies

d)   Academia

e)   Trade Associations

f)   Retailers & Restaurants

g)   Consumer Organisations

The principles that will inspire confidence in LRFFTCP program include:

a)   impartiality,

b)   competence,

c)   responsibility,

d)   openness,

e)   confidentiality, and

f)   responsiveness to complaints.

To ensure that these principles are assured it is essential to have a simple but effective organisation to deliver them. The following figure demonstrates the type of organisational structure needed to achieve this.

Figure 7 - LRFFTCC Organisation Chart
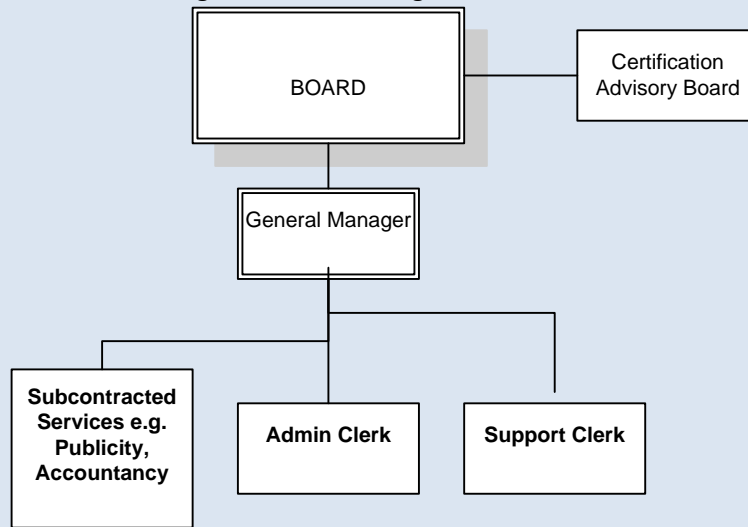
Impartiality

Being impartial, and being perceived to be impartial, is necessary for LRFFT to deliver its program in a manner that gives confidence to its interested parties. It is recognized the source of revenue for LRFFT could offer a potential threat to its impartiality. Therefore to achieve and maintain confidence, it is essential that LRFFT's decisions be based on objective evidence obtained from credible sources, that it validates the authenticity of that information, and that its decisions are not influenced by other interests or by other parties.

Threats to impartiality for LRFFT include the following:

a) Self-interest threats: threats that arise from a person or body acting in their own interest. A concern related to the program of LRFFT and as a threat to impartiality, is financial self-interest.

b) Self-review threats: threats that arise from a person reviewing the work done by themselves.

c) Familiarity (or trust) threats: threats that arise from a person being too familiar with or trusting of another person instead of seeking objective evidence.

d) Intimidation threats: threats that arise from a person or organization having a perception of being coerced openly or secretively.

Structure for safeguarding impartiality

A structure is needed for LRFFT to safeguard the impartiality of its activities. To that end LRFFT should constitute a committee (Certification Advisory Board) that has the following role:

a) to assist in developing the policies relating to impartiality of its activities,

b) to counteract any tendency on the part of LRFFT to allow commercial or other considerations to prevent the consistent objective provision of activities,

c) to advise on matters affecting confidence in its activities, including openness and public perception, and

d) to conduct a review, as least once annually, of the impartiality of its activities and decision making processes.

Other tasks or duties may be assigned to the committee provided these additional tasks or duties do not compromise its essential role of ensuring impartiality.

The composition, terms of reference, duties, authorities, competence of members and responsibilities of this committee shall be formally documented and authorized by the top management of LRFFTCC to ensure:

a) representation of a balance of interests such that no single interest predominates (internal or external personnel of LRFFTCC are considered to be a single interest, and shall not predominate),

b) access to all the information necessary to enable it to fulfil its functions,

Although this committee cannot represent every interest, LRFFTCC should identify and invite key interests. An example of a proposed Certification Advisory Board Membership appears as the following figure.

Figure 8 - Suggested LRFFTCC Advisory Board Membership

	Sector
1	Non Governmental Organisations
2	Non Governmental Organisations
3	Non Governmental Organisations
4	Fishermans Organisations
5	Fishermans Organisations
6	Fishermans Organisations
7	Government Agencies
8	Government Agencies
9	Government Agencies
10	Academia
11	Academia
12	Academia
13	Trade Associations
14	Trade Associations
15	Trade Associations
16	Retailers
17	Retailers
18	Retailers
19	Consumer Organisations
20	Consumer Organisations
21	Consumer Organisations
22	LRFFT General Manager

NOTE:

The important that no-one organisation or sector 'controls' the Certification Advisory Board. This is particularily important for credibility and success of the proposed program. The Certification Advisory Board will have no credibility whatsoever if perceived to be stacked with NGO's each with its own mission and agenda.

<u>Cost Of Certification</u>

The cost of certification is also very important to the potential clients of a LRFFT Certification Programme. As can be seen from the Figure below. The cost of certification is a function of the credibility of that certification.

MSC certification ranges from $US25K to over $US100K and MAC Certification from $US1k to $US3k per client.

_____

Cost Of Certification

HIGH

LOW

Credibility Of Certification

LOW

HIGH

Total Cost Of
Certification

Perceived Range
Of MSC Certification

CredibilityTarget Level
Of LRFFT Certification

Minimum Cost Of
Certification

Optimal Level Of
Certification Credibility

Cost Of Scientific Rigor
Of Certification

Risk Of Stakeholder
Criticism
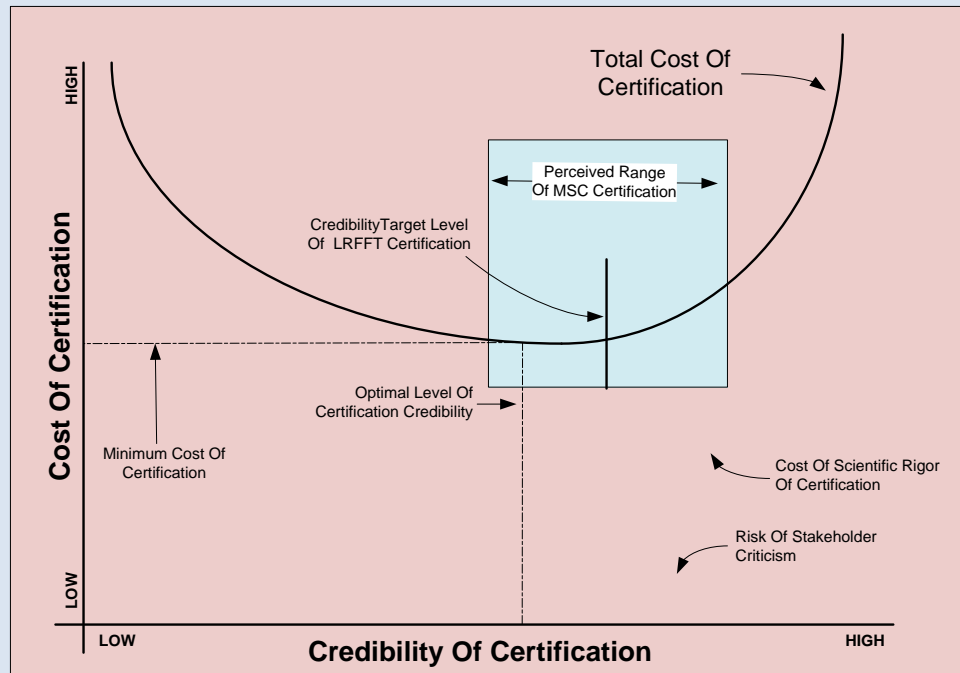
5 Costs projections for managing and running a LRFFTCP program.

To ensure that fishermen engage and participate in aLRFFTCP programme, there is no doubt the the program must be delivered at no cost to them. Funding will therefore have to be secured initially from foundations, NGO's, institutional buyers and other members of the fishing sector and financial sustainability is achieved.

The Marine Stewardship Council has had millions of dollars pumped into it to make it sustainable as an organisation. Similarily the Marine Aquarium Council. These types of programmes are akin to 'owning a boat'. They are bottomless pits for money.

Independent certification programs such as ISO9001 certification are self sustained by the fees paid by the clients of those programmes.

It is therefore essential that the costs of running a LRFFTCC are minimalised to as greater extent as possible whilst still manitaining quality and credibility. There are possibly two alternatives as to where to place LRFFTCC programme office. These are either in the west e.g. USA or (as a BPO activity) within an English-speaking Asian country. As a comparison, estimates have been made as to what it would cost to run LRFFTCC from the USA or the Philippines as follows.

Table 5 - Estimated USA Office Costs

Category	Item	Month 1	Total 1st Year In $US	Total Per Year Subsequent Years In $US
STAFF				
	One General Manager	3,750.00	$44,149.08	$44,149.08
	One Part Time Admin Clerk (20 hours per week)	1,200.00	$14,127.71	$14,127.71
	One Part Time Support Clerk (20 hours per week)	1,200.00	$14,127.71	$14,127.71
	Staff Travel Costs International)	-	$11,773.09	$11,773.09
	Program Promotion Costs	800.00	$9,418.47	$9,418.47
			$0.00	$0.00
ACCOMODATION			$0.00	$0.00
	Office Rent For 100 square feet	2,000.00	$23,546.18	$23,546.18
	Heating & Lighting	100.00	$1,177.31	$1,177.31
	Telephone line rental	40.00	$470.92	$470.92
	Telephone call costs within Canada	40.00	$470.92	$470.92
	Internet Costs DSL etc	100.00	$1,177.31	$1,177.31
	Website Costs	15.00	$176.60	$176.60
	URL Cost	3.00	$35.32	$35.32
	Stationery	50.00	$588.65	$588.65
	Postage	20.00	$235.46	$235.46
	Printing	750.00	$8,829.82	$8,829.82
EQUIPMENT				
	2 Tables	400.00	$392.44	
	4 Chairs	400.00	$392.44	
	1 Filing Cabinet	300.00	$294.33	
	1 desk top PC with LCD Monitor	1,000.00	$981.09	
	Scanner, Fax, Printer	300.00	$294.33	
OTHER COSTS				
	Insurance-fire and theft	70.00	$824.12	$824.12
	Professional Indemnity say for 2 million CAN$	300.00	$3,531.93	$3,531.93
	Company formation fees - (non-profit)	1,000.00	$981.09	
	Accountant fees (annual audit)	2,000.00	$1,962.18	$1,962.18
	Legal Fees	2,000.00	$1,962.18	$1,962.18
	TOTAL SET UP & FIRST YEARS COSTS		$141,920.65	$138,584.94

Table 6 - Estimated Philippines Office Costs

Category	Item	Month 1	Total Per Year In PhP	Total 1st Year In $US	Total Per Year Subsequent Years In $US
STAFF					
	One General Manager	50,000.00	600,000.00	$14,217.90	$14,217.90
	One Part Time Admin Clerk (20 hours pei	5,000.00	60,000.00	$1,421.79	$1,421.79
	One Part Time Support Clerk (20 hours p	5,000.00	60,000.00	$1,421.79	$1,421.79
	Staff Travel Costs International)	-	360,000.00	$8,530.74	$8,530.74
	Program Promotion Costs	25,000.00	300,000.00	$7,108.95	$7,108.95
					$0.00
ACCOMODATION					$0.00
	Office Rent For 100 square feet	20,000.00	240,000.00	$5,687.16	$5,687.16
	Airconditioning	3,000.00	36,000.00	$853.07	$853.07
	Lighting	500.00	6,000.00	$142.18	$142.18
	Water	250.00	3,000.00	$71.09	$71.09
	Telephone line rental	1,000.00	12,000.00	$284.36	$284.36
	Telephone call costs to Canada (estimated at 10 calls per week) (4 x (10 calls x 10 mins/call x 40 php per min))	16,000.00	192,000.00	$4,549.73	$4,549.73
	Internet Costs DSL etc	3,000.00	36,000.00	$853.07	$853.07
	Website Costs	600.00	7,200.00	$170.61	$170.61
	URL Cost	100.00	1,200.00	$28.44	$28.44
	Stationery	900.00	10,800.00	$255.92	$255.92
	Postage	1,000.00	12,000.00	$284.36	$284.36
	Printing	20,000.00	240,000.00	$5,687.16	$5,687.16
EQUIPMENT					
	Airconditioner	18,000.00	18,000.00	$426.54	
	2 Tables	11,000.00	11,000.00	$260.66	
	4 Chairs	8,000.00	8,000.00	$189.57	
	1 Filing Cabinet	7,500.00	7,500.00	$177.72	
	1 desk top PC with LCD Monitor	30,000.00	30,000.00	$710.90	
	Scanner, Fax, Printer	15,000.00	15,000.00	$355.45	
	Water Machine	8,000.00	8,000.00	$189.57	
OTHER COSTS					
	Insurance-fire and theft	2,500.00	30,000.00	$710.90	$710.90
	Professional Indemnity say for 2 million	2,500.00	30,000.00	$710.90	$710.90
	Company formation fees - (non-profit)	25,000.00	25,000.00	$592.41	
	Accountant fees (annual audit)	15,000.00	15,000.00	$355.45	$355.45
	Legal Fees	30,000.00	30,000.00	$710.90	$710.90
	TOTAL SET UP & FIRST YEARS COSTS		2,403,700.00	$56,959.28	$54,056.46

As can be see from the above estimates it is significantly cheaper to operate from the Philippines than from USA. The Philippines is an ever popular location for business process outsourcing and with its access to excellent internet bandwidths and an English speaking skilled labourforce it makes an ideal venue for LRFFTCC Program Office. It is also one of the largest suppliers of LRFF.

In addition to LRFFTCC Office costs there are also the intial and annual accreditation costs. Estimates of these costs were obtained from ANSI as follows.

Table 7 - ANSI ISO 17021 Accreditation Costs

QMS Accreditation (ISO 17021) For Delivery Of ISO9001 Certification		
Application Fee		$5000.00
Document Review	1 day x 1 assessor	$1,100.00
Planning Visit	1 day x 1 assessor	$1,100.00
Initial Accreditation Assessment	2 Days x 2 assessors	$4,400.00
Initial Accreditation Assessment Report Review		$1,100.00
Annual Scope Maintenance		$2,500.00
Total (Excluding Expenses):		**US $15,200.00**

6 Roll-out Of A Proposed LRFFT Certification Programme.

The roll-out of the LRFFTCC programme is designed to take five years. At the end of that period it is hoped that the programme will be self sustaining and offering ANSI or UKAS Accredited ISO9001 Certification for the LRFFT. The LRFFTCP programme could be rolled out in line with the following Gantt Chart.

Figure 9 – Gantt Chart - LRFFT Certification Program Roll-out

Step	Phase	Activity	1	2	3	4	5	6	7	8	9	10	11	12	Year 2	Year 3	Year 4	Year 5
1	1	Secured 5 year funding secured																
2	1	Appoint General Manager																
3	1	Establish LRFFTCC																
4	1	Establish Certification Advisory Board																
5	1	Launch LRFFT Certification Program																
6	1	Website established																
7	1	Website content produced																
8	1	Launch LRFFT Buyers Group																
9	1	Produce LRFFTCP Supporters Kit																
10	1	Sign-up LRFFTCP Supporters																
11	1	Write LRFFTCC Documented Management System																
12	1	Initial Program Certification Applicants indentified																
13	2	Produce LRFFTCP Code Of Conduct																
14	2	Undertake Trial Code Of Conduct Audits																
15	2	Logo licensing agreements produced																
16	2	Intial Code Of Conduct Successfully Audited Organisations Publicised																
17	2	Initial Use of LRFFT Code Of Conduct Logo																
18	2	Ongoing Code Of Conduct Audits																
19	3	Produce ISO9001:2008 Certification Criteria																
20	3	Accreditation Application & Document Review																
21	3	Undertake Trial Certification Assessments																
22	3	Initial LRFFTCC Accreditation Assessment To ISO17021																
23	3	Accreditation Granted																
24	3	First Batch Of Accredited Certifications Granted																
25	3	Initial Use Of LRFFT Certification Logo																
26	3	Ongoing Accredited Certifications																

The above Gantt Chart shows the gradual roll-out of the LRFFT Certification Program over a period of five years based upon a three phase approach of Buyers Group, Code Of Conduct and finally Third party Certification.

The main steps of this roll-out process are as illustrated in the following Figure:

Figure 10-Main Steps To Evolve A LRFFT Certification Programme
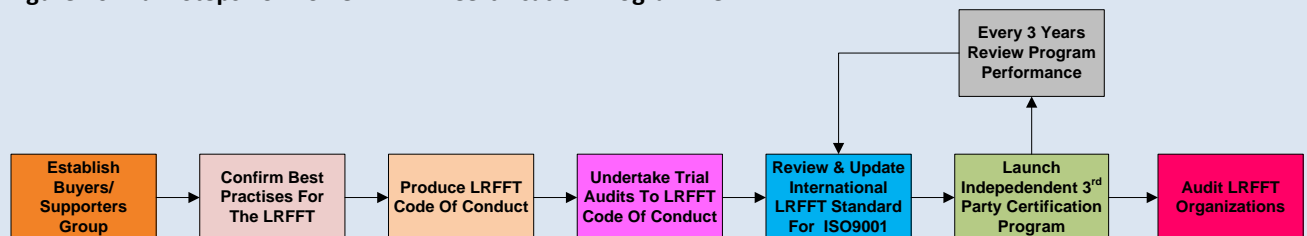
It is planned that the initial Code Of Conduct Certificates will be presented to fishermen and fishing companies within eighteen months of the programme being launched and that accredited ISO9001:2008 certification certificates in Year Four. All certificated entities will be shown on the LRFFTCC Website.

Certified LRFF will be tagged with the logo of the LRFFTCC programme thus giving consumers the choice of buying fish that are certified to meet the criteria of that programme.