Guidelines on Eco-Labeling for the Canned Tuna Industry

Southeast Asian Fisheries Development Center

Department of Fisheries, Thailand

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Guidelines
on Eco-Labeling for the Canned Tuna Industry

by

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Preface

An important commodity in the Southeast Asian Region, tuna is an indigenous marine fish species and is one of the most important fishes that contribute to the region’s national economies. Based on the FAO statistics, the world’s production of tunas (including bonitos and billfishes) in 2006 was 6.5 million mt. Of this total, Asia accounted for 66.2% while the Southeast Asian countries contributed about 26.2% (1.7 million mt). Also in 2006, the FAO and SEAFDEC statistics indicated that the Southeast Asian countries exported about 679,830 mt of tunas (fresh, chilled, frozen and processed) valued at USD 1,720,337,000. Considering the significant contribution from the region in terms of tuna exports to the world market, it is necessary that the region complies with the international trade requirements to be able to sustain and enhance the region’s trading opportunities in the international tuna market arena.

Through the Resolution on Sustainable Fisheries for Food Security for the ASEAN Region adopted in November 2001, the ASEAN countries “recognize the need to strengthen joint ASEAN approaches and priorities on international trade in fish and fishery products indigenous to the region by harmonizing standards, criteria and guidelines.” Considering also that major exporting countries are now concerned about the environmental information of food products with less impacts, SEAFDEC has been assisting the ASEAN countries to harmonize food safety and standards based on the requirements of the exporting countries in accordance with the 2001 resolution.

Recently, many exporting countries have called for the use of eco-labeling to allow consumers to select products that are environment friendly. In compliance, many exporting countries especially in Asia have tried to develop a procedure of labeling their products based on the eco-labeling requirements including product traceability in order to increase their export opportunities.

This guideline on Eco-Labeling for the Canned Tuna Industry have been developed through the initiative of SEAFDEC/TD, to serve as guide for interested ASEAN member countries in developing the more specific code for their products/country interests. Along this vein, the Chain of Custody Certification or Processing and Distribution Certification is also elaborated in this document for reference by interested ASEAN member countries. Nonetheless, SEAFDEC envisaged that these two initiatives can be beneficial to the ASEAN and SEAFDEC member countries as well as to other interested countries, for the further development of their respective fisheries and aquaculture industries.

(Mr. Siri Ekmaharaj, Ph.D.)
SEAFDEC Secretary General and
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Guidelines for Fishing Vessels

Section 1: Fishing vessels documentation

Compliance with Laws and Regulations
Fishing vessels and crews shall comply with the local and National laws as well as with the International Convention for the Safety of Life at Sea and on the Standards of Training, Certification and Watch Keeping for Fishing Vessels Personnel.

Reasons
To ensure that there is no breaking of the laws, rules, conventions and regulations concerning ships and crews.
To ensure that the conditions of vessels are safe at all times both at sea and on shore.
To present to authorized officers at any time especially during ship’s inspection.

Implementation
1. Fishing vessels’ owners and crews shall have the responsibility to obtain and carry onboard all the necessary documents. The necessary permits, licenses and certificates could include:
   - Fishing vessel license
   - Fishing vessel safety certificate as necessary
   - Captain’s certificate
   - Chief engineer’s certificate
   - Navigator’s certificate
   - Engineering crew certificate
   - Helmsman’s certificate
   - Seaman books
   - Crew list
   - Others

2. The authorized officer of the ship should always check the expiration date of all documents to ensure that all documents on board have not expired. In case there are documents that are going to expire soon, the skipper should report these to the company for new endorsement.

3. The company should always have an official document checklist in place and the authorized crew should have this checklist document in hand and to check item by item including the time intervals, such as departure or arrival of the ship, in a monthly basis and annual basis too. These records and check lists should be kept properly. The
provisions from the IMO, SOLAS, STCW-F, MARPOL, etc. should be the reference for the preparation of the check lists.

4. Fishing vessels shall always comply with the requirements stipulated in the document. In case government agency(ies) waive one or more permits, letters granting the waiver or other proof of such waiver should be made available.

5. The vessel representative shall present all necessary documents to the certifier during the course of the vessel inspection.

Section 2: Hull, machinery and electrical system

The ship’s hull, both under and above the water including superstructure, should always be in good condition. All machineries including electrical and piping systems in the open and closed areas should be in good and functioning condition with the necessary spare parts as required by theory and for practicality. The skipper should always remind the crew to do maintenance of the machineries and equipment as often as possible.

Reason

To ensure the seaworthiness of the ship. The ship should be able to stay at sea in different sea conditions according to the capability of the ship. After the ship has gone out of port, she should be able to successfully complete the task and returns back. There should be no cases of untoward accidents/fires arising from the construction of the ship or machinery and its electrical systems should not have any forms of malfunctioning.

Implementation

Official checking should be done at intervals of once every month. Results of the checking procedures should be recorded in the check list format and properly kept in the ship. If certain spare parts are not onboard, the skipper should inform the company for providing and supplying such spare parts. SOLAS should used as the reference of the check list provisions.

Section 3: Navigation communication and safety equipments

All navigation and communication equipments onboard the ships should be working satisfactorily.

Reasons

- To make sure that navigation of the ship will be safe either at near shore, in traffic route, high seas and during the fishing operations.
- To investigate other ships and dangers around the ship.
- To follow the provisions in the laws and regulations.
- To ensure that the ship has enough spare parts for maintenance on board.
- To show to the authorized officer the seaworthiness of the ship.

**Implementation**

Official checking should be done at intervals of once every month. Results of the checking procedures should be recorded in the check list format and properly kept in the ship.

- Navigation and communication equipments should be upgraded following the International Maritime Organization (IMO) regulations.
- The number of navigation and communication equipments installed onboard should be at least on the level of the Safety of Life at Sea (SOLAS) regulations.
- There should be sufficient number of navigation equipment and communication equipment spare parts available onboard.
- All safety equipments and fire fighting appliances should be in satisfactory working conditions and sufficient for all persons onboard.
- All safety equipments and fire fighting appliances should be within the prescribed validity period and must not have expired.
- In case of insufficient number of spare parts, the skipper should inform the company for providing the requirements immediately.

**Section 4: Environmental and social**

Mitigation of environmental effects from the ship and activities of the ship.

**Reasons**

- To ensure that the ship and its activities will not have significant negative environmental impacts to the nature of the sea as well as on the environment and ecosystems.
- To comply with the provisions of the International Convention of the Law of the Sea.
- To upgrade the standard of living of workers onboard in terms of their health, safety and living conditions.
- To show to the authorized officer the recorded documents.
Implementation

1. Official checking should be done at intervals of once every month or at the time of the fishing activity. Results of the checking should be recorded in the check list format and properly kept in the ship. The provisions under the IMO, SOLAS, MARPOL, etc. should be used as reference for the check list, to ensure that:
   1.1 Oily water separator pump and all valves operate satisfactorily.
   1.2 Discharge piping has no heavy corrosion holes on its outer casing.
   1.3 Oil pipes, oil tanks and any parts of ship are checked for cracks or oil leaks.
   1.4 Garbage is separated and discharged in a sanitary and environmental friendly manner. Garbage management plan and garbage discharge record book should be kept onboard and should be made ready for inspection by proper authorities.

2. Antifouling and anti-corrosive paints used at the bottom and boot top of the hull should be tin free in order that these do not alter the properties of the water.

3. Health and work period are properly scheduled; all persons who are assigned as duty watch or in the fishing operations will be provided a minimum of 10 hours of rest in a 24-hour work period. The hours of rest may be divided into not more than 2 periods, one of which shall be for at least 6 hours. All persons onboard shall have sufficient and safe living conditions, good health working conditions and medical care at sea, and sufficient rest and with the same social security protection as the rest of the workers.

Fig. 1  MV.SEAFDEC, Training and Research Vessel equipped with Tuna purse seiner
Guidelines for Fishing Operations

Section 1: Legal matters

Compliance with laws and regulation
The fishing operations shall comply with the local and national laws, and environmental regulations as well as with the regional fishery management organizations’ regulations of the fishing grounds.

Reasons
This is to ensure that the fishing operations are conducted legally and the Tuna stock is properly managed in accordance with the scientific findings and based on the principles of sustainable use.

Implementation
1. Fishing vessel owners have the responsibility to obtain and carry onboard all documents issued and certified by the competent authority of the concerned local, national and regional fishery management organizations for fishing in the particular fishing grounds including:
   - License, permit or authorization to fish as well as the terms and conditions attached to the license, permit or authorization
   - Other licenses required by local or national laws and environmental regulations
2. Fishing vessel owners shall verify the above documents on a regular basis and at least once every year
3. Fishing vessel owners shall present all the necessary documents to the certifier.

Section 2: Social concerns

2.1 Safety and health

Fishing vessel owner shall comply with the local and national labor laws to ensure the workers’ safety and health. The fishing vessel owners shall always have the intention to follow the “Convention and Recommendation Concerning Work in the Fishing Sector” of the International Labor Organization.

Reasons
Compared with other occupations, fishing is a hazardous occupation where the fishers have to work with fishing nets, various types of fishing deck machinery, and catching big and live fishes that can oftentimes cause accident. Moreover, some tuna fishing grounds are very far from shore, so that if an accident happens with the crew, it would take some time before reaching a nearest hospital. Therefore, adequate training on fishing skills as well as on the proper use of fishing equipment including safety and precautionary measures is necessary.

The distance to the fishing ground and the long period of fishing trips could also be a cause of mental depression among the fishers. Therefore, the fishing
vessel owners have the responsibility to provide the necessary resources and facilities for the skipper and the fishers.

**Implementation**

1. Migrant workers in participating fishing vessels should have the necessary licenses, permits or authorization from respective local and/or national labor departments.
2. Fishing vessel owners and/or the skipper shall provide onboard occupational safety and health awareness training.
3. Fishing vessel owners and/or skipper shall allow inspectors to evaluate whether the living conditions in the vessels comply with the national labor law and/or the “Convention and Recommendation Concerning Work in the Fishing Sector” of International Labor Organization.
4. Fishing vessel owners should make sure that fishers have their individual insurance coverage. This can contribute to the improvement of the safety onboard fishing vessels since the factors that could cause accidents could be highlighted.

**2.2 Compensation**

Fishing vessel owners shall provide a fair compensation for all its crew members and fishers.

**Reasons**

Again, fishing is a hazardous occupation compared to other occupations. Thus, the compensation of the crew members and fishers should not be lower than the minimum local or national compensation rates.

**Implementation**

1. Fishers should receive compensation not lower than the minimum national compensation rate
2. Fishing vessel owners and/or skipper shall allow inspectors to evaluate whether compensation provided by the owners complies with standard national compensation rate.

**Section 3: Fishing operation (Tuna purse seine fishery)**

**3.1 Tuna stock**

Fishing operations should be conducted in a manner that these do not lead to overfishing of the Tuna stock.

**Reasons**

All fishery resources are limited resources. It is recognized that sustainable and rational utilization of fisheries resources could be enhanced by good management of concerned organizations and coordination of stakeholders. It is a fact that tuna purse seine operated with FADs could also catch juvenile tuna, therefore proper management is necessary for maintain the tuna stock.
Implementation

1. Fishing operations shall be conducted based on catch quota levels limitation as prescribed by regional fishery management organizations such as the IOTC, WCPFC, etc.
2. Fishing operations shall not be operated during the closed seasons and in protected areas.
3. Fishing vessel owners shall also get involved in observation programs.
4. Fishing logbook shall be kept onboard for inspection at least every 12 months.
5. Daily or periodical submission of reports of vessel’s catch of species recorded to concerned organizations.

3.2 Incidental catch

Fishing operations shall be conducted in a manner that avoids or minimizes mortality of or injuries to endangered, threatened or protected species.

Reasons

It is recognized that some endangered, threatened or protected species such as marine mammals and sea turtles are incidental catch of purse seine tuna fishing operations. Therefore, fishermen should know the fishing technique that avoids the catching of endangered, threatened or protected species. In case such species are encircled or entangled, the fishermen should also know how to release such incidental catch that can avoids or minimizes mortality of or injuries to the species.

Implementation

1. Related organizations and/or Fishing vessel owners and/or skippers shall provide training on appropriate fish handling including resuscitation of by-catch or incidentally caught endangered, threatened or protected species.
2. Fishing vessels shall prepare onboard the necessary equipment for appropriate release of incidentally caught endangered, threatened or protected species.
3. Fish aggregating devices (FADs) shall be made of materials that avoid incidental catch from being entangled. Releasing of entangled endangered, threatened or protected species should also be periodically monitored, while FADs no longer used should be recovered.
4. Fishing operations shall adhere to and implement the guidelines for responsible tuna purse seine fisheries to avoid/reduce the incidental catch of marine mammals.
Section 4: Environmental Concerns

4.1 Energy saving fishing vessel

Fishing vessels shall always have an energy reduction program.

Reasons
The reasons for having an energy saving program are: to reduce the releasing of green house gases and to save on energy or operational costs for the benefit of the society and fishing vessel owner itself.

Implementation
1. Energy saving plan shall be established to promote environmental protection.
2. Crew members shall be educated on the efficient use and saving of energy.

4.2 Environmental friendly fishing operation

Purse seine fishery shall be operated in a responsible manner in order that this does not affect the other marine species and the environment.

Reasons
Every life on earth prefers a good environmental condition. It is therefore a duty of all humans to take care of the environment. Thus, every fishing operation shall adopt the appropriate way to reduce environmental deterioration and possible decline of the marine resources.

Implementation
1. The fishery shall minimize operational wastes from lose of fishing gear by regularly checking and adopting appropriate maintenance practices to prevent ghost fishing by abandoned or lost gears.
2. The fishery shall not release oil and other harmful elements that would cause pollution of the waters.
3. The fishing vessels shall have an appropriate maintenance policy to avoid any oil leak or release of other harmful and polluting elements into the environment.
4. The fishery shall minimize onboard spoilage of catch by adopting appropriate onboard handling procedures.
5. The fishery shall avoid fishing operations that produce an estimated catch which is over and above the vessel’s storage capacity.
6. Skipper and fishermen shall be trained to understand the importance of caring the environment. Appropriate ways to reduce environmental deterioration and decline of the marine resources should be emphasized.
Section 5: Traceability

Record

To establish the traceability of catch from fishing vessels, the following information shall be recorded in the logbook.

- For Each fishing trip
  Departure
    - Port
    - Date
    - Hour
    - Loch
  Arrival
    - Port
    - Date
    - Hour
    - Loch

- For each fishing operation
  - Date
  - Position
  - Result of operation (successful or nil)
  - Beginning time of operation
  - Storage capacity
  - Estimated catch for three main species (Yellow fin, skipjack and bigeye) by size
  - Record of other species (Name, size and weight)
  - Record of discards (Name, size and weight)
  - Record of association

Moreover, the fishing vessel owners shall allow the national or regional fishery management organizations to monitor their fishing activities through an observer and vessel monitoring system program.

Reasons

Traceability is a crucial component of the certification program. Therefore, recording of fishing operations starting with the tuna industry is important. The record will allow customers to track back any tuna product from the fishing vessel, catching area, etc., to make sure that these comply with the environmental, social and responsible fisheries standards.

Implementation

1. Participating fishing vessels shall record the required data in the fishing logbooks. The fishing logbook shall be kept onboard for inspection at least once in 12 months
2. Participating fishing vessels shall also record fishing data in the movement document form or fishing traceability form for each lot of catch, to be sent along with the catch to the ports or processing plants.
3. Participating fishing vessels shall follow the resolution concerning the observer program of national or regional fishery management organizations.

4. Participating fishing vessels shall install a vessel monitoring system on their fishing vessels and shall follow the resolution concerning a vessel monitoring system program of national or regional fishery management organizations.

Fig. 2 above: Tuna purse seine operation on board M.V.SEAFDEC. below: Fish Aggregating Device (FADs) of M.V.SEAFDEC.
Guidelines for Responsible Tuna Canning

Section 1: Legal matters

Compliance with laws and regulations
Processing plants shall comply with local and national laws and environmental regulations, as well as with international food safety and eco-friendly regulations. They shall provide current documentation that demonstrates legal rights for land use, construction permits, business licenses, and water use permits.

Reasons
Certified processing plants shall comply with applicable Industrial Plant Laws, environmental laws and business related laws to assure that their locations, layout, infrastructure, construction and operations do not result in being a nuisance to the community, do not reduce the well-being of the community, or pose hazards to the community and workers. Processing should not adversely affect the environment but can be a source of employment and tax revenue for the local and national governments.

Implementation
Participating plants have the responsibility to obtain all the necessary documentation, such as for plants’ siting, constructing, and operating their facilities. The necessary permits and licenses include:
- Business license
- Processing plant license
- Construction permit
- Underground water use permit

The plant representative shall present all necessary documents to the certifier during the course of inspection. All documents shall be current and the processing plant shall comply with the requirements stipulated by the documents. In case the governmental agency (ies) waived one or more permits, letters granting such waiver or other proof of waiver shall be made available.

Section 2: Social concerns

2.1 Workers’ safety
Processing plants shall comply with local and national labor laws to ensure safety of the workers and adequate or fair compensation.

Reasons
Tuna canning work is hazardous because of the types of equipment used that include such items as sharp knives, retort and the use of potentially hazardous materials especially coolants. Workers would invariably require proper and adequate training in safety precautions, clear instructions on safety measures,
adequate gear to safeguard their health, proper conditions and a wholesome environment for work.

**Implementation**

1) Cannery shall provide legal wages and benefits, and safe drinking water and working environment. However, every effort should be made to exceed these minimum requirements.

2) Machines should be well maintained to avoid risks at work. Maintenance plans should be established, monitored and verified.

3) Workers should be given adequate training upon hiring, as well as regular refresher training on administering first aid for electrical shock, profuse bleeding and other possible medical emergencies.

4) Eating and leisure facilities should be provided for workers during work breaks.

5) Protective devices and appropriate training should be provided to workers who are at risk on safety and adverse health effects.

6) Basic rights of workers should be granted, in accordance with National laws.

7) During facility inspection, the inspector shall evaluate whether the conditions comply with the labor laws. The inspector will also interview a random sample of workers to obtain their opinions on wages, safety and working conditions.

2.2 Community

The Cannery shall undertake social responsibilities to the local communities by, among others, boosting local incomes, supporting educational opportunities, supporting religious activities, and enhancing local infrastructure and public services.

**Reasons**

Most tuna canning plants are large operations, and some local residents might benefit from employment in terms of service provision or infrastructure improvements by the tuna canning plants. Others, however, may not be benefited and in fact, may even be negatively impacted by the operations of the plant. The community should therefore invariably expect to benefit as well as receive assistance from the plants.

**Implementation**

1) Cannery should give priority to local residents in terms of employment

2) A plan is in place for loading and unloading of raw materials and products from vehicles that avoids blocking or causing any traffic problem to the local people.

3) Plan for supporting education, sports, and religious activities in the community is established and implemented.
4) During facility inspection, the inspector may verify the plant’s compliance with the standards through examination of documents and interview with the local people.

Section 3: Incoming raw materials

Certified Tuna cannery shall promote responsible and sustainable fishing practices as well as responsible production of other raw materials.

Reasons

The shared tuna stocks are very important source of food in the Southeast Asian region. Tuna is also traded in and outside the region. Illegal fishing has contributed to the serious depletion of the region’s tuna stocks. Therefore, the promotion of responsible fishing practices and prevention, deterrence and elimination of illegal fishing are essential to ensure food security, poverty alleviation and sustainability of the entire fishing industry chains.

Implementation

1. Fish shall be derived from legal harvests. Fish are caught by fishing vessels in accordance with the regulations of the regional fishery management organizations, e.g. IOTC, WCPFC, SPC, etc., where appropriate.

2. Fish used in canning shall come from a source where fishing operations are certified for ecosystem preservation and environmental friendliness. Every lot of incoming fish is accompanied by relevant documents to prove its original fishing vessel, carrier, species and quantity, trip date, gear type, flag of fishing vessel and certification of fishing vessel.

3. Yellow fin tuna caught by purse seine or gill net in the Eastern Pacific Ocean shall not be used.

4. Fish and other ingredients shall be of good quality, fresh and fit for consumption. Raw materials containing known hazards, e.g. toxic substances and other chemicals that can cause adverse health effect shall not be used. Fish and other ingredients are clean and suitable for processing into food. Fish are immediately examined on receipt at the plant to determine its organoleptic qualities. Records are maintained. Fish shall be segregated or rejected if it is known to be in decomposition state or to contain harmful or extraneous substances. Incoming fish are handled in a sanitary manner and the unacceptable or unsuitable ones are segregated.

5. GMO ingredients and products from or by GMOs shall not be used in the manufacture of canned tuna. Statements from suppliers that declare the use of none-GMOs are required.

6. In a cannery where both ordinary and eco-friendly fish are processed in the same premises, physical separation of such processes shall be performed to prevent mixing of products from fish coming from different sources. Cannery shall have a system in place to prevent the mixing of
ordinary and eco-friendly products during processing and storage. A physical separation is required.

Section 4: Processing controls and finished products

Canning operation shall comply with the national requirements for Good Manufacturing Practices (GMPs) of low acid can food and Hazard Analysis and Critical Control Point (HACCP).

Reasons

To comply with the European Commission Health and Consumer Protection Directorate General (EC/DG), United States Food and Drug Administration (USFDA) and Canadian Food Inspection Agency (CFIA) regulation, in 1999, food processors are legally mandated to implement HACCP system to assure consumers that the food is produced under sanitary conditions, pure, wholesome, and safe to consume.

Good Manufacturing Practices (GMPs) are considered non-process environmental controls that prevent adulteration of products during processing though rigorous cleaning, sanitizing, plant maintenance, exclusion of pests, control of wastes, and employees’ hygiene.

HACCP focuses primarily on risk-prevention measures implemented through the control of processes. In and of itself, HACCP implementation is inadequate to guarantee food safety without the complementary GMPs.

Finished products shall be of good quality, free from substances and microorganisms that could cause adverse health effect to consumers.

Implementation

A GMPs manual which specifies how the processor cleans, sanitizes, maintains the facility and verifies conditions required to ensure food safety, shall be made available.

A HACCP plan shall identify the critical control points, prevention measures, monitoring and verification procedures, corrective actions and product recall procedures.

Evidences to prove compliance with canning operations in accordance with the national requirements either by list of approved plants, certificates of compliance, or other applicable means are demonstrated.

Random sample of finished products shall be analyzed by an accredited laboratory to verify that control processes (GMPs and HACCP system) of certified tuna canning plant are effective, and the finished products are safe and wholesome, in compliance with the food safety standards for physical, chemical and microbiological contamination.

Record keeping is the basic tool that a certifier uses to inspect a facility. Hence, complete and accurate documentation in the plant’s GMPs, HACCP and finished product control, monitoring, verification, and corrective action taken, should be updated and shall be made available to the certifier. During inspection, finished products are inspected and shall be of a good quality that is in compliance with the respective standards, and free from harmful substances and microorganisms.
Required test and limit for canned tuna

<table>
<thead>
<tr>
<th>Component</th>
<th>Limit</th>
<th>Acceptable/Test method</th>
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Section 5: Environment

5.1 Effluent management

Cannery shall dispose of processed water in a responsible manner that does not create pollution and produce excessive odor. The plant shall monitor its effluents at the frequency specified to confirm that the water quality complies with the government effluent standards.

Reasons

Tuna processing plants discharge effluents not only from cleaning and sanitizing but also from thawing, gutting, and stream cooking. Thawing contributes the largest quantity of effluents but in terms of quality, might be the best compared with the effluents from gutting and steam cooking which are rich in organic wastes. Steam cooking effluent is a good source of soluble protein for animals or humans. Effluents from cleaning and sanitizing are high in organic matters, residual levels of chlorine, phosphorus, detergents and other nutrients. These substances can contribute to the eutrophication, increased oxygen demand and pollution in the receiving waters, as well as generate an odor which can be unpleasant for the neighboring communities. Therefore, establishment of appropriate management and disposal system for different types of effluents can reduce environmental impacts, enable compliance, as well as gain positive economic returns.

Implementation

Plants should use a water recycling system to thaw frozen fish in order to minimize water use and effluent water. Plants should establish a processing method for production of soluble protein or attractants from steam cooking water or sell this water to other related processing plants. Plant should screen out solids and hold effluents in settling and/or oxidation pond for treatment before discharging into the sewer systems, canals or other waterways. Discharged materials shall not cause deterioration of the ambient conditions. Steps shall be taken to control odor that originates from the facility. Plants shall verify that the quality of its discharged water complies with all standards.

Proper collection, testing and record keeping of effluent samples are essential for effective effluent management. Samples should be taken during periods of processing, rather than during the inactive periods of the plants.
5.2 Storage and disposal of plant supplies

Fuels, lubricants, chemicals and potentially toxic or dangerous compounds shall be properly labeled, stored, used and disposed of in a safe and responsible manner.

Reasons

Processing plants regularly use a variety of chemicals and toxic substances that can cause damage to products, workers or the environment.

Gaseous ammonia and refrigerants can be dangerous to workers and contaminate the environment, while chemicals like sodium metabisulfite and chlorine, if not used at safe levels, are potential hazards to the health of workers and the safety of the plant’s products. Fuel and oil spills, ammonia leaks and the improper use of pesticides and other chemicals can result in water pollution and could be toxic to aquatic organisms and the wildlife.

Implementation

Potentially toxic compounds and chemicals shall be properly labeled, stored and used according to the instructions provided in the labels. Government regulations relating to the use or handling of such materials shall also be followed. Disposal of unwanted lubricants and outdated chemicals shall be carried out in a safe and responsible manner to prevent environmental contamination.

Oil leaks and spills from equipment should be prevented through good maintenance. Used oil and contaminated refrigerants should be removed and disposed of properly. Outdated chemicals and wastes collected after spills should be properly contained, labeled and disposed in a safe place to avoid environmental damage or risk to animals and people.

Hazardous chemicals such as insecticides, chlorides and sodium metabisulfite should be stored in locked, well-ventilated, water-tight building. The building’s concrete floors should slope to a center basin for containing spills. Warning signs shall be posted. Oxidants shall be stored in a safe area where these could not come into contact with diesel, petrol or other oils to avoid combustion or explosion. Secondary containment for fuel storage is required, and “flammable materials” and “no smoking” signs shall be installed at the fuel storage areas.

Procedures should be developed for managing spills or leaks of oil, fuel, gas, chemicals and other substances. The equipment and supplies required to manage and clean up the spills shall be readily available and accessible. Workers should be trained to properly use the equipment and handle the contained wastes. In particular, ammonia shall be properly stored and workers using it should be trained on how to deal with the gas if it leaks into the atmosphere.
5.3 Conservation of natural resources

Tuna canning plants shall have an energy reduction program in place.

Reasons
The reasons for energy saving are to reduce the release of green house gases, and save energy or money for the good of the society and the company itself.

Implementation
1. Canning operations shall be conducted in such a way that they can preserve the natural resources through the efficient use of energy, water and other materials. The use of renewable energy sources, for instance, biogas generated from waste water, shall be promoted. Activities that lead to energy waste shall be avoided.
   - Communications among workers are established to educate them on the efficient use and saving of energy.
   - Water piping and machinery are well maintained to prevent losses of water and electricity due to leakage.
   - Renewable energy is applied, for instance, biogas generated from waste water, as well as reusing/recycling of water.
   - Energy saving plan is established to promote environmental protection.

2. Materials for product packaging shall be reusable or recyclable to minimize environmental impact.

3. If bored water is used, permission shall be granted from relevant authorities.
   - Cannery should have proper documents to demonstrate the legal permit for use of bored water. Water wells are also sufficient for this purpose.

Section 6: Traceability

Records – Keeping requirements
To establish product traceability, the following information shall be recorded for each lot of fish and entered in the certified body’s online database (if available)
   - Name of fishing boat and certified fishing boat identification
   - IOTC or WCPFC, identification number
   - Carrier vessel name and certified carrier vessel identification
   - Period of catching
   - Catching area
   - Catching method
- Type of fish and quantity
- Date and time of receipt of products at plant
- Processing condition
- Plant lot number
- Finished lot weight
- Product form and count
- Product quality and analytical laboratory
- Buyer’s name
- Lot quantity shipped
- Shipping date
- Invoice / transfer number
- Etc.

Reasons

Product traceability is a crucial component of the certification program. It interconnects the links in the canned tuna production chain and allows every processed lot to be traced back to the fishing vessel, catching area and input’s origin. Results of food quality and safety analyses by accredited laboratories can also be included. Traceability ultimately assures the purchaser that all steps in the production chain comply with the environmental, social and food safety standards. The external traceability will enable the producer, seller to recall the products and solve any problem immediately. The internal traceability will provide information for improving the production efficiency.

Implementation

Participating tuna canning plants can maintain proper records of the required data in notebooks or files using the sample tuna processing plant product traceability form provided below. If possible, the information should also be transferred to computer database files, with the original files kept to allow verification of the electronic data. The record keeping process requires timely, organized, accurate entries ideally performed by a single clerk responsible for collecting the data and transferring them to the database.

Adequate record keeping is only meaningful when combined with procedures that maintain lot separation. Incoming lots of tuna from certified fishing vessels shall be accurately labeled and shall not be stored, mixed or processed with lots from non-certified fishing vessels.

When the online database becomes fully active, this information shall be added via the internet to the database. Canned tuna buyer will then have access to the information for the chain of custody traceability.
**Sample Tuna Canning Plant Product Traceability Form**

<table>
<thead>
<tr>
<th>Processing plant name</th>
<th>Lot number</th>
</tr>
</thead>
<tbody>
<tr>
<td>Certified plant number</td>
<td>Lot number</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Lot weight</th>
<th>Species</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Received from: Carrier boat name</th>
<th>Boat lot number</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fishing boat name</td>
<td>Reception time / date</td>
</tr>
<tr>
<td>Flag of catching boat</td>
<td></td>
</tr>
<tr>
<td>Catching area</td>
<td></td>
</tr>
<tr>
<td>Period of catching</td>
<td></td>
</tr>
<tr>
<td>Catching method</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Process and product information</th>
</tr>
</thead>
<tbody>
<tr>
<td>?</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Sold to: Buyer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Buyer name and certified number</td>
</tr>
<tr>
<td>Shipping date</td>
</tr>
<tr>
<td>Lot quantity shipped</td>
</tr>
<tr>
<td>Invoice number</td>
</tr>
<tr>
<td>Container company / number</td>
</tr>
<tr>
<td>Destination</td>
</tr>
</tbody>
</table>
Guidelines for Chain of Custody Certification

What is the objective of chain of custody certification?
- To provide assurance for suppliers, to demonstrate and claim that products originate from certified fishery, and to minimize the risk of public confusion between fish and fish products that have not been certified.

How to ensure that the product originate from the certified fishery?
- Systems and procedures should be in place to ensure that certified fish are labeled and kept separated from non-certified fish starting from goods in, storage, processing, packaging, product labeling and goods out.
- A full product traceability system for the whole supply chain should be in place that could be rapidly and effectively traced.
- Detailed records should be adequately kept to include information on where the certified fish come from, who supplied the fish, quantities, conversion rate of raw materials to products, quantity of final products, with whom the products are sold.

Why does the chain of custody (CoC) certification exist?
- Chain of custody certification is a prerequisite for using the Type I eco-label.
- Fisheries certification is a prerequisite for chain of custody certification.
- To provide additional benefits to certified fisheries.
- For communication on the added value of certified seafood.
- To ensure that the products bought by consumers are produced from fish caught by certified responsible fisheries.
- Allow consumers to support suppliers who show responsibility to the fish stocks and the environment.
- To support the mitigation efforts of global climate change.
- To support responsible and sustainable fisheries.

Who should be involved in the chain of custody certification?
- Anyone who takes ownership of certified fish and wants to be certified for chain of custody for using the eco-label logo such as processors, distributors, retailers, restaurant operators or restaurateurs, food service operators, fishmongers.

Scope of the CoC certification
- Covers all the link in the supply chain starting from harvest or point of first landing to retailers or consumers.
Section 1: General management and control system

The organization shall have a control and management system for the flow of certified fish throughout the business operation.

**Reason**
To ensure that certified products sold to customers come from certified fish, not mixed with non-certified fish.

**Implementation**

1. An organization chart with names, photos, positions and responsibilities should be prepared and posted at the entrance where everybody can see so that the auditor can also tell whether the company has appropriate and well organized structure or not, and the staff would also know their duties and responsibilities.

2. Make a diagram identifying each step in the processing line, where a certain step is taking place and who is responsible for doing such step.

3. Organize training course periodically to educate and refresh the staff and workers on how to identify certified fish and certified products from non-certified ones, and on how to separate them during storage, processing and distribution; and also what and how to record the goods in, storing, processing, final product and calculating the mass balance to ensure that products with eco-label are made from certified fish, certified processing methods and sold to certified distributors.
1. Example of Organization Chart
2. Example of diagram identifying each step in the processing line

The organization should have a diagram showing the flow of certified fish through the business operation.

**Reason**: To highlight the importance of having a control system for the separation of certified fish and non-certified fish in the processing plant and during distribution.

**Implementation**: Clearly identify steps in the processing line, where and how the fish is received, stored and processed, and who is responsible or looks after the certified fish, non-certified fish and products.

The details of each step are discussed in the next section.
Section 2: Goods in

The organization shall have a procedure of receiving certified fish or certified product from your suppliers in place.

Reasons
It is important to know exactly where and how much certified fish you have received into your business as this will determine how much certified product you can sell. It is also important to remove the risk that non-certified fish can somehow end up being identified as certified fish or the other way around.

Implementation
1. What should you do to order certified fish?
   - Check the list of certified suppliers of the fish that you are aiming at.
   - Make the necessary order to the certified suppliers. Specify your requirements for certified fish when ordering and keep copy of such order.
2. What to do when certified fish arrives at goods in?
   - Check the invoice or delivery note for certified identification and certified label on arriving fish.
   - Get the certified goods in record sheet (Table 1) and record information according to the record sheet or can also keep records electronically if a system is in place to do so.
   - Every batch of certified fish received shall be given a unique batch code and a secure and clear certified label should be placed on the fish or container or each pallet so everyone in the company would know that it is a certified product.
   - For a distributor or someone who sells directly to consumers, may choose to simply use the batch codes received from supplier.
   - Stored certified fish in a designated room or area which is clearly marked and clear to everyone internally that it is a certified fish room or area which separates from the non-certified fish and that only responsible persons can have access to the room. Record information for fish stored according to fish record sheet for certified fish in the storage room (Table 2)
Section 3: Processing and packaging

The organization shall have system in place to separate certified fish and non-certified fish throughout processing and manufacturing.

Reasons
To ensure that products that bear the certified label do not become mixed with non-certified products at any point during processing and manufacturing.

Implementation
1. Separation
   1.1 Separation for transfer of raw material
       - Move the certified fish from the certified storage location or area or room to the certified processing line, if there is no separate line then the process should be separated by time of operation.
       - Make sure that any container and pallet used to move certified raw materials are clearly and securely labeled or are in different colors.
   1.2 Separation in processing
       - Processing should be in separate line or time
       - All containers used are identified by different colors or clearly labeled.
   1.3 Separation for certified products
       - Make sure to have certified product name, certified batch number or certified logo, weight, production date and expiration date on the product label or package.
   1.4 Separation for storage of products
       - Use a separate storage room or area or location for certified products. If necessary to store alongside with non-certified products, the certified or MSC products shall be securely over-wrapped marked with large visible label with the certified logo or letters on it and indicate the quantity.

2. Record the raw materials used in processing and the products obtained for each production batch.
   2.1 Record the weight of certified fish taken out from the storage area and the remaining weight in the storage record sheet (Table 2).
   2.2 Record processing date, species, batch number and the weight of certified raw materials used to make a batch of products (Table 3).
   2.3 Record processed name (fillet, canning etc.) and processing location (i.e. Production line / unit / work station), batch number and weight or units of products produced (Table 3).
Section 4: Goods out

The organization shall have an identification, separation and documentation system for sending certified products to customers.

Reasons
- To ensure that the certified products bought by customers are made from certified fish.
- Allow full tracking and tracing from the consumer product to the producer.
- To prevent risk of mixing certified products with non-certified products.

Implementation
1. Identification and separation of certified outputs.
   - All certified products sent or sold to customers shall be clearly labeled so that the customers would know that it is a certified product when they receive it.
   - Certified product should be transported in separate container or truck if applicable or practical.
   - Certified and non-certified product may be transported in the same consignment, only if the certified product is separately packaged and labeled.
   - Include a reference to the “Certification agency” in the delivery note.
   - Sales invoice should clearly identify the certified product. This can be done by simply adding the “abbreviation of the certification agency” on the regular delivery note and invoice including the product name, fish species, batch number and total weight. This way, the customers can trace from the invoice.

2. Records keeping.
   - Keep a record of every certified products shipment including the customer’s name, product name, batch number, quantity, dispatch by and date (Table 4).
   - Keep copy of invoice in the files.
Section 5: Records keeping and control system

The organization shall operate an appropriate system to record and maintain information of all inputs, processing and outputs of certified fish and fish products.

Reasons
- To ensure that the certified and eco-labeled products are produced from certified fish which could be confirmed by matching the certified supplier’s record with goods in record, goods out record, certified customer record which take into account the process conversion rate of outputs from the inputs.
- Records are evidence to be shown to the auditor who could ensure that the company meets the chain of custody standards since the auditor could not be available onsite all the time and can only see the products that is actually onsite at the time of inspection, so everything else is relived based on the records keeping.
- To be able to trace from any point of the product chain.

Implementation
The organization shall operate and record the following information for “Goods in”, processing and “Goods out”

Goods in
- The process of receiving certified fish from your suppliers is known as “Goods in”
  - Make order to certified suppliers and specify the requirements for certified fish when ordering and keep the purchase order in file.
  - Check invoice against label, species and weight of arriving fish and keep the invoice in file.
  - Keep records of all certified fish delivered including the date, supplier’s CoC or fisheries certification number, species, batch number, invoice number, weight, brought to which storage room and the person responsible for such certified fish (Table 1)

Processing
- Every time certified fish is taken from the storage room and allocated to production line, the date, process undertaken, species, raw material batch code number and weight should be recorded, and after processing, the product name, product code number, quantity and storage room or area should also be recorded as well as the by product or wastage weight and where it would go if still applicable (Table 2)
  - Do mass balance calculation for verification by
    \[
    \text{Conversion rate} = \frac{\text{Product weight}}{\text{Raw material weight}}
    \]
    \[
    \text{Product sold} = \text{Certified fish received} \times \text{conversion rate} \leq \text{Certified fish purchased or received}
    \]
Goods out
The process of sending certified products to customers is known as “Goods out”.
- Every time the certified fish product is distributed or shipped to customers, the date, customer’s name and CoC number, sales invoice number, specification of product (species, product name, batch number), quantity and from which storage room the product was drawn, distributed by, and delivery number should be recorded (Table 4).
- Fresh fish retailers or service food operators should record the customer order and copy of sales received for each specified certified fish.

Inventory
- Record every time each batch of certified fish is deposited in and taken out from the storage room and the remaining stock (Table 2).
- Record every time each batch of certified product is deposited in and taken out from the product storage room or area and the remaining stock (Table 5).

Record control
- All records of certified products should be kept in separate files for easy access, tracking and tracing.
- All records shall be kept in record sheet document files or may be recorded electronically in the company instead.
- Records shall be maintained for a minimum of three years.
Table 1: Goods in record sheet

<table>
<thead>
<tr>
<th>DATE</th>
<th>SUPPLIER/CERTIFIED No.</th>
<th>PRODUCT/SPECIES</th>
<th>BATCH NUMBER</th>
<th>INVOICE NUMBER</th>
<th>QUANTITY</th>
<th>RECEIVED BY</th>
<th>STORAGE LOCATION</th>
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</tbody>
</table>
Table 2: Inventory for certified fish in storage room

<table>
<thead>
<tr>
<th>DATE</th>
<th>FISH STORE IN</th>
<th>FISH TAKEN OUT</th>
<th>BALANCE</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>PRODUCT /SPECIES</td>
<td>BATCH No.</td>
<td>QUANTITY</td>
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<td>01</td>
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</table>
Table 3: Processing and packaging record sheet

<table>
<thead>
<tr>
<th>Date</th>
<th>Description of Certified Fish Used</th>
<th>Description of Certified Product Manufacturer</th>
<th>Storage Location</th>
<th>Certified by Product Quantity</th>
<th>Responsible by</th>
</tr>
</thead>
<tbody>
<tr>
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<tr>
<td>GOODS OUT RECORD SHEET</td>
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</table>

### Table 4: Goods out record sheet

<table>
<thead>
<tr>
<th>DATE SHIPPED</th>
<th>CUSTOMER/CoC CERTIFIED No.</th>
<th>PRODUCT/SPECIES</th>
<th>BATCH NUMBER</th>
<th>INVOICE NUMBER</th>
<th>QUANTITY</th>
<th>SENT BY</th>
<th>DELIVERY NUMBER</th>
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<tbody>
<tr>
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</table>
Table 5: Inventory for certified product in storage area

<table>
<thead>
<tr>
<th>DATE</th>
<th>PRODUCT STORE</th>
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<th>PRODUCT SALE</th>
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<tbody>
<tr>
<td></td>
<td>PRODUCT NAME</td>
<td>BATCH No.</td>
<td>QUANTITY</td>
<td>STORAGE LOCATION</td>
<td>PRODUCT NAME</td>
<td>BATCH No.</td>
<td>QUANTITY</td>
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Overview and quick start guide for chain of custody certification

Quickly find out where you are and what your next step should be

**Reason**: For getting ready (plan and adjust) and to ensure a smooth certification process.

**Implementation**: Follow the flowchart to see what stage you are at and what your next step should be, then plan, adjust and implement the necessary adjustments.

![Flowchart](image-url)
Pre-audit guide

- Perform a brief informal check (by yourself) of your management system and performance of your business (processing or distribution and traceability system) for compliance with the CoC standard.
- Decide whether to progress to the formal auditing or not.

Reason: To save on time and money for auditing and decision making.

Implementation: Use the following pre-audit check list to check the situation of the actual practice.

Pre-audit check list guide

Records keeping and control system
- Who has the overall responsibility for implementing and maintaining the Chain of Custody certification in your business?
- Do you have a system in place for managing ‘Goods in’?
- Do you have a system in place for storage and processing of certified fish in your premises?
- Do you have a system in place for controlling ‘Goods out’?
- Do you have a system in place for keeping records of ‘Goods in’, ‘Processing and packaging’ and ‘Goods out’?

Goods in
- Do you check whether your supplier is certified for responsible fisheries and/or Chain of Custody before ordering?
- When ordering, do you specify your requirements for certified fish?
- Do you have records of all your suppliers’ Fisheries certification number and/or Chain of Custody certificate numbers and the products they deal with?
- Can your staff identify when a certified fish is coming into the business?
- What steps do you take to identify and check the certified fish on arrival?
- What steps do you take to label and clearly identify certified fish once it is in your business?
- Can you present accurate and clear records of every batch of certified fish received during a certain period? Do these records show dates, quantities, species and suppliers?
- Can you present orders for each delivery of certified fish, clearly showing the product’s name and the requirement for certification?
**Processing/packing/storage**

- What systems do you have in place to ensure that certified fish does not become mixed with non-certified fish?
- Walk through your premises – are all containers clearly and securely labeled?
- Can you find the ‘goods in’ record for any batch of certified fish in storage?
- Can you present records showing how each batch of certified fish received was used in your business (including, where appropriate, processing location and final product)?
- Where there are similar fish species, or products, are they clearly labeled and segregated? Is there any risk of picking the wrong product?

**Goods out**

- What systems do you have in place to make sure that every time certified fish is sold to your customers it is clearly labeled, and they can tell it is certified?
- Do you separately identify the certified products, including the product name, fish species and total weight on your sales invoices?
- Can you present records for all the certified fish you have sold to customers, including the product name, weight and customer? If you are a fresh fish retailer or foodservice operator, can you show to the auditor how much certified fish you have sold?
- How do you ensure that when your customer orders certified fish, they are supplied with certified fish? What happens in an ‘out of stock’ event?

**Note:** Not all of your fish needs to be from certified sources; you just need to be able to separate and identify those that are certified.
Checklist for Chain of Custody Certification

1. Who has the overall responsibility for implementing and maintaining the Chain of Custody certification in your business?

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
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</thead>
<tbody>
<tr>
<td>1.1</td>
<td>Do you have an organization chart with photos, names and responsibilities</td>
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<tr>
<td>1.2</td>
<td>Do you have the working steps</td>
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<td>1.3</td>
<td>Do you have a record and information of training staff</td>
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</table>

2. Does your plant comply and is certified for

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
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<tbody>
<tr>
<td>GMP</td>
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<td>ISO 9000 series</td>
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<td>ISO 14000 series</td>
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<td>Other; Please specify</td>
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3. Do you have a system in place for managing “Goods in”

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
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</thead>
<tbody>
<tr>
<td>3.1 When ordering, do you specify your requirement for certified fish</td>
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<tr>
<td>3.2 Do you check whether your supplier is certified for fisheries or chain of custody</td>
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<td></td>
<td>Briefly list the name and fisheries certification number or CoC number of your suppliers and the products they are dealing with</td>
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<tr>
<td>3.3 Does your certified fish come with catch information</td>
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<tr>
<td>3.4 Does your certified fish come with landing information and landing port certification?</td>
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<tr>
<td>3.5 Can your staff identify when the certified fish is coming into the business</td>
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</tbody>
</table>

- What steps do you take to identify and check certified fish on arrival
  - Check invoice for indication of certified fish and certification No.
  - Look for certified label on arriving fish or on container or package
  - Identify and weigh the fish
  - Record information of received fish according to the “Goods in” record sheet (Table 1)
  - Others: please specify

- Cross check or confirm with actual practice, and interview the workers and responsible persons.
### 3.6 What steps do you take to label and clearly identify certified fish once it is in your business?

| 3.6.1 Give a unique batch code number followed by abbreviation of certification agency | Yes | No |
| 3.6.2 Secure a clear, big, visible, diverse color label the fish or container or pallet |   |   |
| 3.6.3 Use container with diverse color for certified fish |   |   |
| 3.6.4 Cross check with the actual practice |   |   |
| 3.6.5 Others, please specify:…………………………………….. |   |   |

### 3.7 Can you present accurate and clear records for every batch of certified fish received during the period?

**What does the record show?**
- Date
- Supplier’s name and fisheries certification number
- Fish species or product name
- Batch number
- Quantities
- Where it goes
- Confirm □ Satisfied
  □ Not satisfied and corrective action needed
- Others, specify…………………………………….. | Yes | No |

### 3.8 Can you present orders for each delivery of certified fish which clearly show the product name and the requirement for certified fish? | Yes | No |

### 4. Do you have a system in place for tracing certified fish through processing and packaging?

- □ Yes
- □ No

#### 4.1 What system do you have in place to ensure that certified fish does not become mixed with non-certified fish
- □ There are designated storage rooms or a location specific for certified fish only.
- □ There is special label, container and pallet for certified fish.
- □ All containers used are clearly and securely labeled or have different colors from containers for non-certified fish.
- □ There is withdrawal note from processing manager to store manager specifying the date, species, batch number and quantity of certified fish required.
- □ There is movement document or delivery note of certified fish to processing manager which includes the date, species, batch number, and quantity from store manager.
- □ Verifying by double checking with the label on the fish and/or on the container and/or on pallet before moving the fish.
### 4.2 Can you find the “Goods in” record for any batch of certified fish in storage

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<th>Yes</th>
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### 4.3 Can you present records showing how each batch of certified fish received into your business was used? (Include, where appropriate, how much was used, into what product it was made, processing location, quantity produced and mass balance as in Table 3)

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### 4.4 Where there are similar fish species

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#### 4.4.1 Are they clearly labeled and separate?

#### 4.4.2 Is there any risk of picking the wrong fish?

- Workshop and training of staff on identification and separation systems used.
- Clear, certified label are put on certified fish and containers with different colors are used for certified fish.
- Having a clear separate storage area for certified fish.
- Only responsible person with a withdrawal slip can access to the certified fish.
- Confirmation is made by the handling man or distributor and processor.
- On site monitoring by responsible persons.
- Verifying by mass balance.
- Others, please specify.

### 5. Do you have a system in place for sending certified product to your customers?

- Yes
- No

#### 5.1 What system do you have in place to make sure that every time certified fish or product is sold, your customer can tell it is certified product?

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#### 5.1.1 Do you separately identify the certified product including the product name, product batch number, weight with reference to certification agency’s name, e.g. TMEL\(^1\) canned Tuna, batch number 112345TMEL, 4 oz.?

#### 5.1.2 Do you put a certification logo on the product label?

#### 5.1.3 Do you separately identify product name, product batch number with reference to certification agency’s name on the delivery note?

---

\(^1\) Thailand Marine Ecolabel (TMEL)
| 5.1.4 | Do you separately identify product name, product batch number with reference to certification agency's name on the sales invoice? |  
| 5.1.5 | Do you include a reference to certification agency's name on the receipt or bill when sold directly to consumers? |  
| 5.1.6 | Other system, please specify |  

| 5.2 | Do you have a system in place to make sure that certified product is not mixed with non-certified product at the process of sending or distribution? | Yes | No |

| What distribution system do you have? |
| - Separate truck |
| - Separate container |
| - Same truck or in same container, but separately packed and labeled |

| 5.3 | Can you present records for all the certified fish you have sold to customers? | Yes | No |

| - Confirm by goods out records (Table 4) |

| 5.4 | How do you ensure that when your customer orders certified fish they are supplied with certified fish? | Yes | No |

| 5.4.1 | By checking the certified goods in, processing, packaging and goods out management systems and records. |  
| 5.4.2 | By calculating the mass balance |  

| 5.5 | What happens when an “out of stock” event occur? | Yes | No |

| 5.5.1 | Do you inform the customer that you regret for running out of certified fish or fish product on a particular day or do you put a note on the menu or information board of food service shop, whatever and wherever would be appropriate |  
| 5.5.2 | Do you allocate funds to support more fishermen to fish responsibly and get certified so that there will be enough supply to meet the demand |  
| 5.5.3 | Others, please specify |  

| 6 | Do you have a system in place for keeping records of “Goods in”, storage, processing and “goods out” of certified fish and products? | Yes | No |

| 6.1 | What method do you use to keep record of goods in, processing and goods out? |
| - By record sheet |
| - By electronic means |
6.2  Can you present records for Goods in, processing and goods out

6.3  How long are you going to keep the records…………………………………years

6.4  Can you trace back from certified products batch number to processor and certified fisheries? Please confirm.  

6.5  Can you trace from each certified fish receive to the customer your sale and quantity? Please confirm

   Can you trace back from invoice to processor and certified fisheries? Please confirm

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