



# **ASC Question for Interpretation (QA) Procedure**

**Version 2.0**

**1 Sept 2024**

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# 1. Amendment History

Date	Version	Summary of Amendment
1 Sept 2024	2.0	<ul style="list-style-type: none"> <li>• Formatting and branding</li> <li>• General language and phrasing for clarity</li> <li>• General processing timelines and use of calendar days in all timelines</li> </ul> <p><b>New Sections</b></p> <ul style="list-style-type: none"> <li>• Section 15: Requests for Further Clarification</li> <li>• Section 16: Archiving of QAs</li> <li>• Section 17: Withdrawal of QAs</li> <li>• Appendix B: Acronyms</li> </ul> <p><b>Amended Sections</b></p> <ul style="list-style-type: none"> <li>• Section 10: Submission and Formulation Requirements</li> <li>• Section 11: Administrative Review</li> <li>• Section 12: Technical Review</li> <li>• Section 13: QA Committee</li> <li>• Section 14: QA Publication</li> <li>• Appendix A: Process Flowcharts</li> </ul>
25 Oct 2021	1.0	New document

# 2. Contact Information

## Aquaculture Stewardship Council (ASC)

Daalseplein 101,  
 3511 SX Utrecht, the Netherlands  
 Phone: +31 30 239 31 10

## Variance Request Team

Email: [VR@asc-aqua.org](mailto:VR@asc-aqua.org)

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### 3. Introduction

Aquaculture Stewardship Council (ASC) is an independent, not-for-profit organisation that operates a voluntary, independent third-party certification and labelling programme based on a scientifically robust set of standards. ASC standards define criteria designed to help transform the aquaculture sector towards environmental sustainability and social responsibility, as per the ASC Mission.

#### ASC Vision

A world where aquaculture plays a major role in supplying food and social benefits for humanity whilst minimising negative impacts on the environment.

#### ASC Mission

To transform seafood farming towards environmental sustainability and social responsibility using market mechanisms, improvement incentives and value-add services from farm to fork.

#### Question for Interpretation

Certificate holders, Conformity Assessment Bodies (CAB), the ASC appointed accreditation body Assurance Services International (ASI), and stakeholders may encounter a situation where an interpretation of the language or the intent of an indicator or a requirement is needed. To address this need, ASC has developed the Question for Interpretation (QA) process.

The QA process is connected to the ASC Programme Development and Revision Procedure. In contrast to Variance Requests (VRs), QAs provide temporary additional guidance and information between revisions to programme documents. VRs are an adaptation of ASC Requirements to a local context whilst adhering to the original intent and are managed through the ASC VR Procedure. All QAs will be evaluated for inclusion during the development of new programme documents. To ensure transparency, all QAs and VRs are publicly available on the ASC [VR/QA Platform](#).

### 4. Purpose

This procedure outlines the steps for submission, processing, and publishing of QAs. The procedure ensures that all QAs are processed in a consistent manner and that the outcomes are clear and replicable.

### 5. Scope

This procedure applies to QAs regarding ASC standards, ASC Certification and Accreditation Requirements (CAR) and Requirements for the Unit of Certification (RUoC) (CAR) documents applicable to certificate holders or CABs.

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## 6. Effective Date

This procedure will be effective from 1 December 2024.

## 7. Supporting Documents

Supporting documents are available through the [ASC Controlled Document Master List](#).

- ASC Certification and Accreditation Requirements (CAR)
- ASC GDPR Data Protection Policy
- ASC Privacy Policy
- ASC Programme Development and Revision Procedure
- ASC QA Committee Terms of Reference
- ASC Requirements for Unit of Certification (RUoC)
- ASC Standards

## 8. Terms and Definitions

- The definitions applicable to this document are also available through the [ASC Vocabulary Portal](#).
- All timelines listed in this procedure are expressed as calendar days.

Term	Definition
<b>Question for Interpretation (QA)</b>	An interpretation of the language or the intent of an indicator or a requirement.
<b>Stakeholder</b>	A person, group, or organisation that has a direct or indirect stake in an organisation because it can affect or be affected by the organisation's actions, objectives, and policies.

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## 9. Roles and Responsibilities

Role	Responsibility
<b>Aquaculture Stewardship Council (ASC)</b>	Responsible for following and updating this procedure.
<b>QA Requester (Requester)</b>	CAB or ASI submitting a Question for Interpretation using this Procedure.
<b>QA Committee</b>	Responsible for reviewing and approving QA responses prior to publication.
<b>Administrative Reviewer</b>	Assigned reviewer responsible for determining if QA submissions meet the Submission and Formulation Requirements.
<b>Technical Reviewer (Reviewer)</b>	Assigned reviewer responsible for drafting an interpretation to present to the QA Committee.

## 10. Submission and Formulation Requirements

**10.1** QAs shall be submitted by:

- CABs and ASI via the MyASC Variance Request and Interpretation Platform (the [VR/QA Platform](#)).
- Stakeholders via [VR@asc-aqua.org](mailto:VR@asc-aqua.org)
- Certificate holders via contacting their CAB to submit a QA on their behalf or via [VR@asc-aqua.org](mailto:VR@asc-aqua.org).

**10.2** ASC may issue QAs when clarifications are required.

**10.3** All new and updated QAs shall be communicated to CABs.

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**10.4** Requesters shall check the [VR/QA Platform](#) to determine if a similar QA has been processed prior to submitting a new request.

**10.4.1** Requesters may reference previously closed QAs if:

- A) The QA is not archived.
- B) The clause or indicator and requirement wording remains the same in the most recent document version that is under the scope of the QA, regardless of if the clause or indicator number has changed.

**10.5** All requests received shall:

- A) Be written in clear and concise English.
- B) Be related to Indicator(s) from a single Criterion of a Principle, if the QA is related to an ASC standard, or a single requirement if the QA is related to the CAR.
- C) Not request that ASC decide conformity of a Unit of Certification (UoC), or how to demonstrate conformity.
- D) Not request approval of a corrective action to close a non-conformity raised by a CAB.
- E) Not request ASC to adapt standards or CAR content.
- F) Include only necessary supporting evidence that shall:
  - Be in English or have a summary written in English
  - Be clear, concise with a defined link to the QA
  - Be made public with the QA by ASC
  - i. Exceptions may be made for personal or proprietary information as defined in the ASC Privacy Policy and GDPR Data Protection Policy.
  - ii. A summary of the confidential information shall be included in the submission and made public with the QA for transparency.

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**10.6** All requests received via the [VR/QA Platform](#) shall:

- A) Indicate if the QA is related to an audit
  - i. If related to an audit, indicate at least one of the following:
    - Unit of Certification (UoC)
    - Country
    - Region
- B) Indicate the type of request:
  - Question for Interpretation
  - Question about accreditation process
- C) Indicate whether the QA is related to an ASI finding.

**10.7** QAs may be submitted at any time.

**10.8** For initial or re-certification audits, CABs should consider our QA processing timelines and aim to submit Standard QAs within 28 days after the completion of the audit.

**10.9** CABs shall continue to adhere to all non-conformity and certification decision timelines as outlined in the ASC CAR.

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# 11. Administrative Review

- 11.1** Within five days of receipt of the submission, ASC will conclude an Administrative Review of the QA.
- 11.2** The Administrative Review will evaluate compliance of the QA submission as per Section 10.
- 11.3** If a QA fails to comply with Section 10, ASC will notify the Requester of the reasons for the failure.
  - 11.3.1** The Requester may revise the submission and re-submit.
  - 11.3.2** The revised QA shall be re-submitted within 14 days, or the QA will be closed as declined.
  - 11.3.3** ASC will complete another Administrative Review within five days of receipt of the revised QA.
  - 11.3.4** If the revised QA does not comply with Section 10, ASC will close and decline the QA.
- 11.4** Within two days of successful completion of Administrative Review, ASC will:
  - A) Publish the QA on the ASC [VR/QA Platform](#)
  - B) Send a confirmation of publication to the Requester.
  - C) Begin Technical Review of the QA.

# 12. Technical Review

- 12.1** The Reviewer will provide ASC with a draft Interpretation within 21 days of its assignment.

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## 13. QA Committee

- 13.1 ASC will send the draft Interpretation to the QA Committee within two days of receipt.
- 13.2 Within 14 days of receipt, the draft Interpretation will be reviewed by the QA Committee.
  - 13.2.1 If a revision to the draft Interpretation is required by the QA Committee, ASC will send the rationale for revision to the Reviewer.
  - 13.2.2 The QA Committee will review the revised draft interpretation.
  - 13.2.3 All QA Committee steps will be completed within 21 days.

## 14. QA Publication

- 14.1 Within two days following receipt of a confirmed final Interpretation, ASC will:
  - A) Publish the final Interpretation on the [VR/QA Platform](#).
  - B) Categorise the QA as "Closed".
  - C) Send confirmation of the closing the QA to the Requester.

## 15. Requests for Further Clarification

- 15.1 Requesters may request further clarification on a published interpretation by emailing [VR@asc-aqua.org](mailto:VR@asc-aqua.org); a new QA submission is not required.
- 15.2 ASC will process the requests for further clarification following this procedure.

## 16. Archiving of QAs

- 16.1 When revised Standards or CAR become effective or following a periodic review, ASC will archive QAs that are no longer applicable.
- 16.2 ASC will notify all CABs when a QA is archived.

## 17. Withdrawal of QAs

- 17.1 The Requester may voluntarily withdraw a QA submission at any time before the QA is published.
- 17.2 Withdrawals shall be communicated to ASC via [VR@asc-aqua.org](mailto:VR@asc-aqua.org) as soon as possible.

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# Appendix B Acronyms

Acronym	Term
<b>ASC</b>	Aquaculture Stewardship Council
<b>CAB</b>	Conformity Assessment Body
<b>ASI</b>	Assurance Services International
<b>QA</b>	Question for Interpretation
<b>UoC</b>	Unit of Certification
<b>VR</b>	Variance Request
<b>CAR</b>	Certification and Accreditation Requirements
<b>RUoC</b>	Requirements for the Unit of Certification

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