

# New CAR Consultation Overview

Consultation 2024

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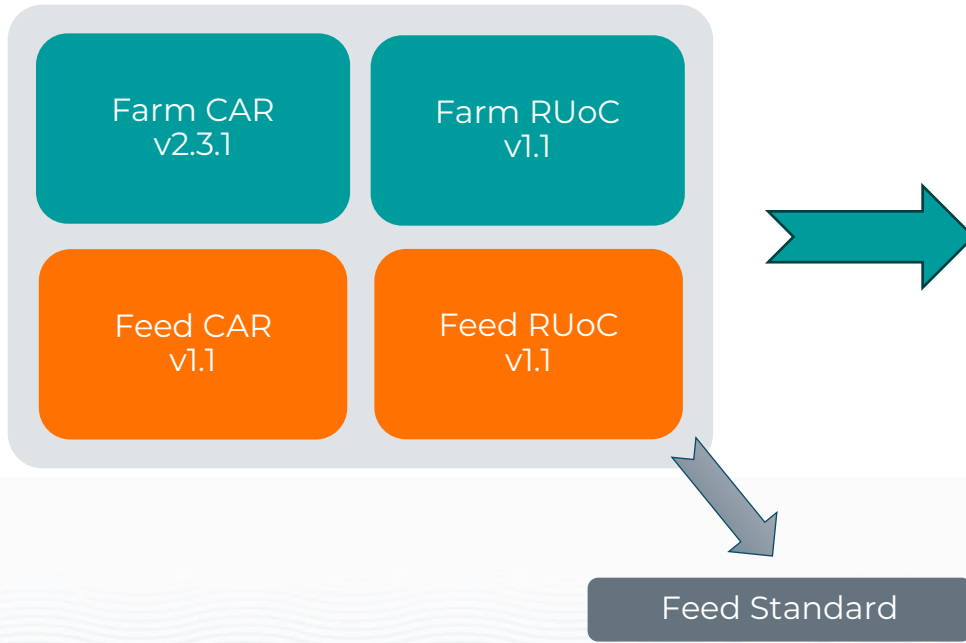


**Setting The  
Standard for  
Seafood**

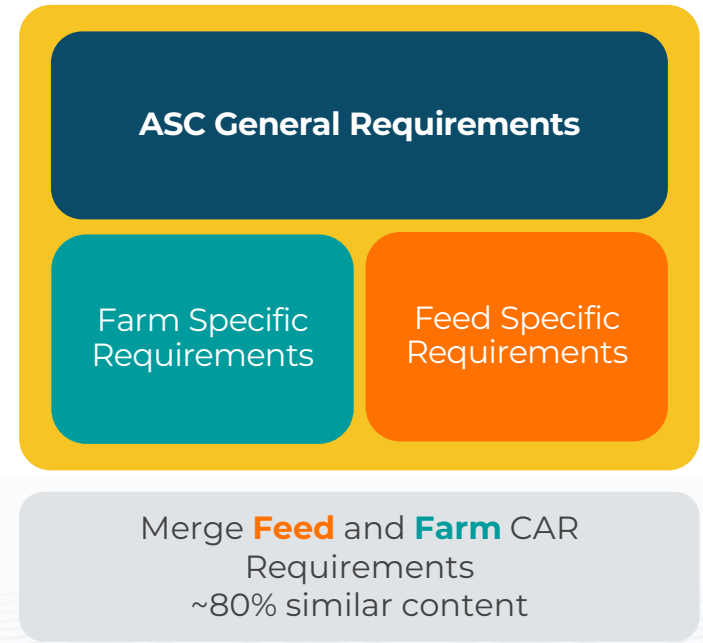


# Simplifying assurance documents

Current Structure: four documents



New Structure: ONE document



# New CAR Structure

## FOUR CAR Requirement Categories



### Common/Core

*Applicable to all farms, feed mills and certification types*



### Farm Specific

*Applicable to all farms under all certification types*



### Feed Specific

*Applicable to all feed mills under all certification types*



### Group Certification Specific

*Applicable to group entities*

# CAR structure

- New CAR merges Farm and Feed Certification requirements
- Structure still being developed, improvement on flow and order for normative references
- Same structure will be used in online interactive documents

## General

## Farm

## Feed

### Audit Timing

**3.25** The exact timing of the CAB routine audits shall be the responsibility of the CAB, in consultation with the Client<sup>1</sup>. **For initial audits**, the site under the UoC shall have been in operation for a minimum period of 6 months, with records consistent with ASC requirements.

**3.25.1** ■ For **Initial audits**, the site shall have completed the previous harvest cycle, with this previous cycle having similar operational conditions to the current cycle.

**3.25.2** ■ For **Initial audits** of long cycle species, the audit may be conducted before the completion of the site initial harvest cycle, providing that the required ASC farm data will be available for CAB evaluation within the prescribed certification decision timelines.

**3.25.3** ■ The CAB shall schedule site audits when the sites are in production of the species under the scope of the UoC.

**3.25.4** ■ In exceptional cases, the CAB may conduct surveillance or recertification site audits without product on site if:

A) ■ The audit is not an unannounced audit, **and**

B) ■ The site grows a long cycle species, **and**

C) ■ The site is fallowing, **and**

D) ■ The previous audit was conducted with product on site.

**3.25.5** ■ For **initial audits**: the site shall have a functioning Ingredient Accounting System (IAS); and

**3.25.6** ■ For **initial audits**: at least one documented successful IAS balancing exercise shall have been completed. This also applies where a shared IAS is in operation.

**3.25.7** ■ For **recertification audits**: the CAB should conduct the audit at least 6 months before the expiry date of the existing certificate to minimise the risk of a lapse of certification.

# Key Consultation Questions



Setting The  
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# Change Certification Type Names

## Proposed change

Under the current the CAR (2.3.1), there are the following certification types:

- **Single Site**
- **Multi-site Option 1**
- **Multi-site Option 2**
- **Group**

To facilitate the merging of previous Multi-site Option 2 and Group Requirements and to maintain consistency in terminology, ASC is proposing changing the Certification Types to:

- Single Site
- Multi-site (Previously Multi-site Option 1)
- Group – Option 1 (Previously Multi-site Option 2)
- Group – Option 2 (Previously Group)

**New CAR Reference: Part B** Table 1, Table 2

# Scope of Certification – Processing

## Proposed change

Under the current CAR (2.3.1), a separate chain of custody certification is required if processing or packing activities were within the scope of the certification, unless some conditions exist allowing the inclusion of these activities in the scope of farm certification.

ASC is proposing that processing and packing are no longer included in the scope of Farm Standard certification and separate Chain of Custody certification will be required for these activities.

CAR 2.3.1 Reference: Clause 6.2

**New CAR Reference:** Part B, Requirement 1.3

# Scope of Certification – Slaughter

## Proposed change

Under the current CAR (2.3.1), the CAB shall define the scope of certification taking into account: activities undertaken at the UoC or subcontractors before the product changes ownership or is handled by any further certified chain of custody Certificate Holders. This includes but is not limited to: harvest, **slaughtering**, product storage, transport, **processing** and packing, if undertaken in the UoC.

ASC is proposing that **slaughter** that occurs **outside of the UoC** shall not be included in the scope of certification.

CAR 2.3.1 Reference: Clause 6.1

**New CAR Reference:** Part B, Requirement 1.3 (H)



# Unannounced Audits – Risk based approach

## Proposed change

Under the current CAR (2.3.1), ASC has a matrix (Table 1) to evaluate the risks for selecting the sites to undergo unannounced audits.

ASC is proposing replacing this table with a risk-based approach which considers the following risk factors to determine the risk level:

- a) Non-conformity findings raised at most recent CAB site audit
- b) The length of time the site has been certified under the UoC
- c) Site's annual production volume
- d) Site's relationship with the Client, i.e. owned by the

Client, subcontracted, under contract farming agreement

You will be asked to choose your preferred process:

1. A CAB develops their own risk assessment and thresholds based on these risk factors
2. ASC develops a risk assessment and thresholds based on these risk factors

CAR 2.3.1 Reference: Clause 25.4 and Table 1

**New CAR Reference:** Requirement 10.6

# Unannounced Audit: no product on site

## Proposed change

Under the current CAR (2.3.1), CABs can conduct surveillance and re-certification audits when there is no product under specified conditions.

ASC proposes to amend this requirement to specify that a surveillance or re-certification audit without product on site **cannot** be an unannounced audit.

CAR 2.3.1 Reference: Requirement 8.4

**New CAR Reference:** Requirement 3.25.4 (A)

- 3.25.4** ■ In exceptional cases, the CAB may conduct surveillance or recertification site audits without product on site if:
- A) ■ The audit is **not** an unannounced audit, **and**
  - B) ■ The site grows a long cycle species, **and**
  - C) ■ The site is following, **and**
  - D) ■ The previous audit was conducted with product on site.

# Unannounced Audits: minimum number of clients

## Proposed change

Under the current CAR (2.3.1), there is no minimum number of clients before a CAB is required to conduct unannounced audits.

ASC is proposing no requirement for CABs to conduct unannounced audits if they have ten or fewer certified sites per programme (Farm and Feed).

*CAR 2.3.1 Reference: Req. 25.4*

**New CAR Reference:** Requirement 10.2

# Auditor Competencies: minimum number of ASC audits

## Proposed change

Under the current CAR (2.3.1), ASC does not require auditors to complete a minimum number of ASC audits per CAB each year to maintain auditor competency.

ASC is proposing a minimum number of ASC audits to be completed each year.

The proposal is completion of one to two audits per year, per CAB depending on the auditor role.

### For example:

A Farm Environmental Auditor will need to complete at least two ASC Farm audits annually.

A Feed Technical Auditor will need to complete at least one ASC Feed audit annually.

CAR 2.3.1 Reference: N/A

**New CAR Reference:** Appendix E

# Auditor Competencies: Qualification & Training

## Proposed change

Under the current CAR (2.3.1), ASC Farm environmental auditors are not required to meet the lead auditor competency requirements.

In the new CAR, ASC is proposing that all Farm environmental auditors meet the lead auditor competency requirements. At least 90% of environmental auditors already have this qualification.

CAR 2.3.1 Reference: Annex B table C

**New CAR Reference:** Appendix E, Table E2

# Certificate Withdrawal: withdrawal period for certificate holders

## Proposed change

Under the current CAR (2.3.1), certificate holders that had their certificates withdrawn are not permitted to re-apply for ASC certification under multiple timelines.

ASC is proposing to streamline these deadlines to just two timelines based on the below text.

The following situations trigger a **24-month** withdrawal period (from new CAR requirement 13.16):

- The Client presents forged documents as evidence
- The Client is successfully prosecuted for fraudulent activities, child labour, slavery, human trafficking or forced labour
- The Client has attempted to bribe or threaten any member of the audit team
- The Client is suspended, withdrawn, or cancelled and does not follow the prescribed product

requirements to not use the ASC logo or notify their customers

The following situations trigger a **12-month** withdrawal period (from new CAR requirement 13.18):

- The Client does not close critical NCs within set timeframes
- The Client does not complete the actions to lift suspensions within set timeframes
- The Client does not conform to an ASC Standard indicator where a critical non-conformity is prescribed

CAR 2.3.1 Reference: Clause 30.6.1

**New CAR Reference:** Requirement 13.16, 13.17, 13.18

# Certificate Withdrawal: failure to notify

## Proposed change

Under the current CAR (2.3.1), clients are responsible for notifying the CAB of incidents such as escapes or legal violations. However, if a client fails to notify the CAB of such events and site harvests occur before their next audit, there is a possibility that ASC certified product entered the marketplace without penalty.

Therefore, ASC is considering an assurance consequence for clients **who fail to notify their CAB as an additional penalty.**

You will be asked if you support a consequence for Clients who do not notify their CAB of major incidents that could have affected their certification status, and

what an appropriate sanction and timeframe would be.

- a) No Sanction
- b) Certificate withdrawal 12 months
- c) Certificate withdrawal 24 months

CAR 2.3.1 Reference: 7.5.12 and 7.5.13

**New CAR Reference: N/A**

# Certificate Withdrawal: immediate withdrawal

## Proposed change

ASC is proposing amending the assurance process in the event of a critical non-conformity as prescribed in the Standard. For example, under Farm Standard Appendix 6 for Alien Species, Table 5. In this case, the client certificate is not subject to a period of suspension and the certificate is **immediately withdrawn**.

This will result in a 2 potential actions in the event of a critical NC.

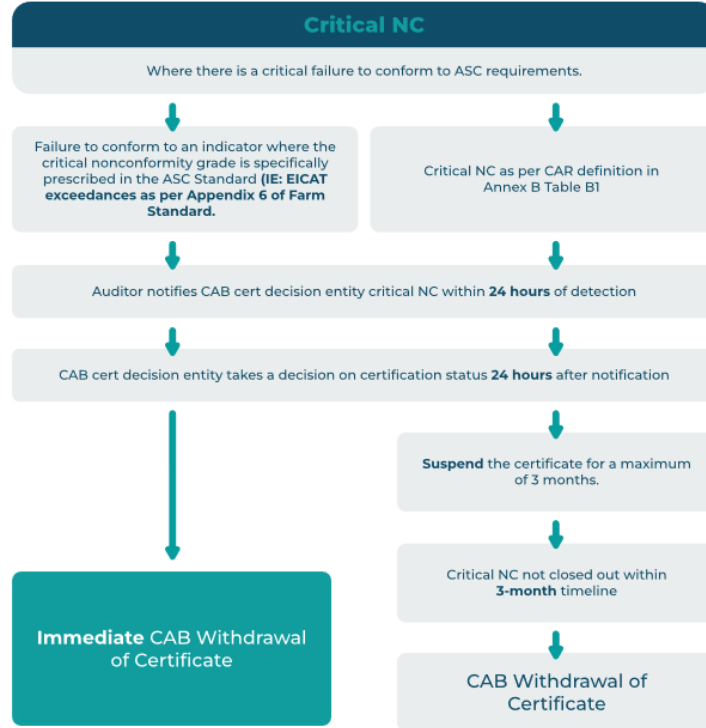
See visual on the next slide.



# Certificate Withdrawal: immediate withdrawal

## Proposed change

### Critical NC



# Group Requirements: certification type requirements

## Proposed change

ASC is proposing changing the permitted site-client relationships and product ownership for all certification types to strengthen assurance and to clarify the ownership of the legal entity.

This proposal will now restrict **contract farming** to the certification type- Group Option-2.

The Client will retain ownership of the certified product for all certification types with the exclusion of certification type Group Option-2.

With certification type Group Option-2, the contract farmer owns the ASC product and **must sell this product to the Client before the Client can sell this ASC certified product outside the UoC.**

CAR 2.3.1 Reference: 6.4.1, 6.4.2, 6.4.3

**New CAR Reference: Part B Table 1, Table 2**

# Change Certification Type Requirements

## Proposed structure

### Overview

Current CAR certification type	CAR 3.0	Sites ownership	Site audits
Single Site	Single Site	Owned by the certificate holder	Single site audited
Multi-site without IMS(option 1)	Multi-site	All sites owned by the certificate holder	All the sites audited
Multi-site with IMS (option 2)	Group 1	All the sites owned by the certificate holder	Sample of sites audited
Group	Group 2	Sites are owned by farmers represented by the certificate holder. Mainly for small producers	Sample of sites audited

# Group Requirements: internal management system audit and site audits

## Proposed change

Under the current CAR (2.3.1), there is no prescribed sequence of events for the IMS audit in relation to the on-site audits.

ASC is evaluating options for the sequence of events of Group audits.

The following choices are being proposed for your consideration:

- A. The CAB conducts the group's IMS audit and then subsequent sample of site audits (concurrently) in the same audit event
- B. The CAB conducts the group's IMS audit and then subsequent site audits in 2 separate points in time. (i.e. conduct the audit of the Group's IMS against the ASC

Group Requirements and leave a longer period of time between this IMS audit and sample of site audits)

- C. The CAB can choose a) or b) at their discretion.
- D. Specify another option [free text]

You are also being asked to consider the logistical challenges should there be a need to increase the site sample size as part of the audit process.

(Note: the number of sites audited may need to be increased depending on discoveries during the IMS audit.)

CAR 2.3.1 Reference: Requirement E1.2

**New CAR Reference: N/A**

# Group Requirements: non-conformity grading

## Proposed change

Under CAR 2.3.1 for group certification, there are details of when a CAB can raise a Critical NC (Group Management Body (GMB) Critical) against a Client's Internal Management System (IMS).

ASC is proposing to amend this grading to Group Critical non-conformity and Group Major non-conformity **but not permit the raising of Group Minor NCs.**

The rationale for excluding Group Minor NC's is to limit the length of time Group NC's can remain open to align with the current timelines associated with Critical and Major NC grades.

CAR 2.3.1 Reference: F1.10.2

**New CAR Reference:** Appendix C Table C2

# Group Requirements: site sample Selection Based on Risk

## Proposed change

Under current CAR (2.3.1), Table F1 contains the risk assessment for group audits which was also used to categorise the risk levels of each site within the Group UoC.

ASC is proposing to not reference risk assessment Table F1 in the new CAR. ASC is proposing to replace this reference with the following:

### Site Sample Selection for Group Audits

- 3.20 The CAB's sample size allocation shall consist of 50% of sites with a medium or high-risk rating and 50% of sites selected at random.
- 3.21 The 50% of sites selected with a medium or high-risk rating shall be based on the following factors:
  - A) Non-conformity findings raised at most recent internal site audit.
  - B) Non-conformity findings raised at most recent CAB site audit.
  - C) The length of time the site has been certified under the UoC.
  - D) Site's annual production volume.
  - E) Site's relationship with the Client, i.e., owned by the Client, subcontracted, under contract farming agreement.

CAR 2.3.1 Reference: Clause F4.5.3

**New CAR Reference:** Requirement 3.20 and 3.21

# Group Requirements: harvest witnessing

## Proposed change

Under the current CAR (2.3.1), harvest must be witnessed at least once during the certification cycle (i.e. once every three years) for long cycle species.

ASC is proposing the following for Group clients:

During every CAB routine audit of the selected sample of sites, harvesting shall be witnessed at least once.

*CAR 2.3.1 Reference: Req. 8.5*

**New CAR Reference:** Requirement 3.28

# Translations

## Proposed change

Under the current CAR (2.3.1), audit reports may require translation into other languages for stakeholders.

Under the new CAR, ASC is proposing to eliminate the requirement to translate audit reports to other languages.

CAR 2.3.1 Reference: Anne C, CI

**New CAR Reference: N/A**



# Helpful links:

**ASC Vocab Portal:** <https://data.asc-aqua.org/asc-vocabulary/>

**Controlled Document master List:** <https://data.asc-aqua.org/asc-controlled-document-master-list/>

# Thank you



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