



AUSTRALIAN  
**Prawn  
Farmers**  
ASSOCIATION



# **Sustainably Farmed Barramundi** **Sustainably Farmed Prawns** **Certification Program**

## **Management Program and Policy Manual**

**Certification Procedures**

**Policies and Processes**

**Auditing and Integrity**

**Logo Control and Use**

**Continual Improvement**



## Sustainably Farmed Barramundi and Prawn Certification Management Program and Policy Manual



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1. ABFA engaged EcoSustainAbility to help develop the Australian Sustainably Farmed Barramundi Certification Programme including to develop the Certification Criteria and Certification Manual and associated documentation for this programme, which has and will continue to be revised and updated from time to time.
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4. ABFA will cooperate and assist EcoSustainAbility and the Australian Prawn Farmers Association (APFA) to develop a complementary certification programme for Australian farmed prawns and is so doing is prepared to consider the two certifications programmes having a shared and combined manual, management committee and certification panel.
5. Potential exists to extend this or a similar arrangement to other species or geographic region in future but EcoSustainAbility undertakes not seek to do so without the prior agreement and cooperation of ABFA.

Once completed, EcoSustainAbility will provide ABFA and APFA a licence to use this report for the purposes of their joint certification program. Other uses prohibited without permission.

Work undertaken by EcoSustainAbility for the development of the Australian Sustainably Farmed Prawns Certification Program for the Australian Prawn Farmers Association has been funded by the Fisheries Research and Development Corporation. Use of the new intellectual property developed for this project is subject to the APFA-FRDC Agreement and the Terms and Conditions of EcoSustainAbility's engagement.



ABFA owns the registered trademark of the Sustainable Barramundi logo.



Once Finalised APFA will own and register the trademark of the Sustainable Prawn logo (once the draft is finalised)



# Sustainably Farmed Barramundi and Prawn Certification Management Program and Policy Manual



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*The sustainably farmed certification program for prawns has been developed following the successful launching of the Barramundi certification program. The two programs each have specific criteria but will be managed together as one overall program.*

# 1. Introduction

## 1.1. Background

### 1.1.1. Sustainably Farmed Barramundi Certification Program

The Australian Barramundi Farmers Association has developed a certification program addressing economic, social and environmental aspects of sustainability including hygiene and quality aspects of production. The system includes an approach which is applicable at the various scales of the industry and one that sets minimum standards whilst recognising best practice.

### 1.1.2. Barramundi and Prawn Partnership

The development of this certification program and criteria for sustainably farmed prawns is fundamentally based on existing intellectual property developed by EcoSustainAbility to establish the Australian Sustainably Farmed Barramundi Certification Program for the Australian Barramundi Farmers Association. ABFA and APFA have a partnership approach to the ongoing management of the certification program. The two programs each have specific criteria but will be managed together as one overall program.

### 1.1.3. Integrated Program Management and Policy Manual

This Manual is the integrated manual for the management of the Australian Sustainably Farmed Barramundi Certification Program and the Australian Sustainably Farmed Prawn Certification Program

### 1.1.4. Beyond Compliance

Aquaculture is an Environmentally Relevant Activity in Queensland and requires environmental and/or fisheries licences in other states. The Prawn and Barramundi farming industry has had over 30 for prawns of the discipline of complying with and reporting on performance of the required standards. The proposed approach now builds on compliance and statutory reporting requirements to address much wider aspects of sustainability that are not just compliance based. It is proposed to take holistic approach to environmental responsibility (due diligence) beyond what is required by strict compliance.

## 1.2. This Manual

This Manual provides an overview of the integrated management program and policies for the Australian Sustainably Farmed Barramundi and Australian Sustainably Farmed Prawns certification programs.

## 1.3. Status

The Management Program and Policy Manual set out the policy and procedures approved by the ABFA and APFA Boards on **XXX Month 2016** for the Australian Sustainably Farmed Barramundi and Prawns Certification Programs.

**NOTE This version has yet to be approved by the ABFA and APFA Boards.**



## 1.4. Sustainability Vision

The vision is:

*The farming of Barramundi and Prawns in Australia is ecologically sustainable, ecoefficient and produces a quality product that is internationally competitive.*





## 2. Program Overview

### 2.1. Key Components

The key components of the certification program are:

- Annual Ecoefficiency Benchmarking
- Certification Application, including the:
  - Sustainability Checklist; and
  - Risk Assessment;
- Certification offsite audit and onsite audit; and
- Annual return

### 2.2. Key Steps

There are 6 major steps in the certification process:

- Submission of the **Ecoefficiency Benchmarking, Sustainability Checklist and Risk Assessment** along with other **supporting evidence** to support with the application for Sustainability Certification to the ABFA Sustainability Auditor.
- An initial **offsite or onsite audit** is undertaken by the approved ABFA Sustainability Auditor on the basis of the **Ecoefficiency Benchmarking, Sustainability Checklist and Risk Assessment** and supporting evidence.
- The Certification Panel considers the Auditors recommendation and confirms **Certification, Certification Subject to Corrective Actions** or declines Certification.
- If an initial **offsite audit** was undertaken, an **onsite audit** will then be required within two years of the initial certification.
- An **Annual Return** and annual **Ecoefficiency Benchmarking** is required each year along with a recertification process including an annual offsite audit. **Re-completion** of the whole checklist is required every 2 years.
- Further **onsite audits** are required every 2–3 years.

#### 2.2.1. Awards Program

As a further aspect of the program an annual awards system is being establish to encourage and recognise best practice sustainability and ecoefficiency in Australian barramundi and prawn farming.



## 2.3. Administration

The Australian Sustainable Farmed Barramundi and Australian Sustainable Farmed Prawn certification programs are administered jointly ABFA and APFA. ABFA and APFA have appointed:

- A four member independent Certification Panel to confer Certification, suggest administrative policy and interpretation to the ABFA/APFA boards and advise the ABFA/APFA boards on annual awards.
- A Sustainability Auditor to compile ecoefficiency benchmarking results, undertake an initial and then biennial offsite assessments, and as required on-site assessments.

## 2.4. Integrity

The establishment of a sustainability certification program needs to have solid integrity in its processes and policies. There are a variety of global standards and guides which may apply. The Prawn and Barramundi certification program is relatively small, given the limited number of Prawn and Barramundi farms in Australia and as such complete application of these international norms for multi sector conformity assessment bodies would be beyond the resources of APFA and ABFA. This Certification program has been developed with reference to ISO 14024 *Environmental labels and declarations Type 1 environmental labelling Principles and Procedures* and ISO 17065 *Conformity Assessment – Requirements for Bodies certifying products, processes and services*.

### 2.4.1. Independence

One key aspect of the integrity of the Sustainability Certification system is to have an independent assessment (the audit) and a separate independent Certification Panel. This model allows ABFA/APFA to own and administer its Sustainability Certification System whilst maintaining independence and integrity.

### 2.4.2. Appeals

A formal appeals process allows an independent review in the event of any dispute.



## 3. Program Integrity

### 3.1. Certification Policy and Protocol

This chapter forms the basis of the Australian Barramundi Farmers Association (ABFA) and Australian Prawn Farmers Association (APFA) certification and audit policy and protocol. It establishes a framework for auditing and certifying Barramundi and Prawn Farms against the relevant certification criteria. The processes include an approach based on farmer self assessment, off-site audit prior to certification and then regular onsite auditing.

### 3.2. Key Components

The key components of the certification program are:

- Annual Ecoefficiency Benchmarking
- Certification Application, including the:
  - Sustainability Checklist; and
  - Risk Assessment
- Certification offsite audit and/or onsite audit
- Evaluation by the Certification Panel for certification
- Annual return

#### Awards Program Program

As a further aspect of the program an annual awards system is being established to encourage and recognise best practice sustainability and ecoefficiency in Australian Prawn and Barramundi Farming.

#### 3.2.2. Independence

One key aspect of the integrity of the Sustainably Farmed Barramundi/Prawn Certification system is to have an independent assessment (the audit) and a separate independent Certification Panel. This model allows ABFA/APFA to own and administer its Sustainability Certification System whilst maintaining independence and integrity.

#### 3.2.3. Appeals

A formal appeals process allows for review should there be a dispute.





### **3.3. Appointing Auditors**

#### **3.3.1. Auditor Qualifications**

In accordance with the ABFA/APFA's Certification Audit Policy, the following requirements are considered essential:

- A thorough understanding of the principles of sustainability and ecoefficiency as it applies to finfish aquaculture, and the intent of the Australian Sustainable Barramundi and Prawn Farming Certification criteria.
- Experience with aquaculture and specifically practical experience in achieving sustainability and ecoefficiency.
- Experience in undertaking environmental audits.
- A graduate or post graduate degree in ecology, environmental science or similar.

#### **3.3.2. Appointment of Auditors**

Auditor(s) will be appointed collaboratively by the Presidents of ABFA and APFA in consultation with the Chair of the Certification Panel.

NOTE: It is envisaged that one auditor will be appointed initially.

### **3.4. Certification Panel**

A certification panel of four independent experts will be appointed by ABFA and APFA.

The experts should have experience in aquaculture, ecoefficiency and primary production sustainability. The Panel should have a variety of expertise and backgrounds from working in industry, research or government policy/development roles. The panel will need to offer their support in an honorary, volunteer role.

It is intended that the Panel can include:

- A person with substantial experience in aquaculture (most likely not a barramundi/prawn farmer owing to potential conflict of interest, but perhaps a Queensland farmer not currently engaged in barramundi/prawn farming).
- A person from the seafood retail industry.
- A person with aquaculture technical knowledge and or research experience.
- Other member(s) with an understanding of practical best practice sustainability for primary industries and /or an understanding of government policy.

The ABFA/APFA Presidents are ex-officio but NON VOTING members of the Panel.



The commitment required from each panel member should not exceed 20 hours per year. This assumes a maximum of a monthly one hour teleconference meeting and other time for review of emails, commenting on issues, approving minutes etc.

ABFA/APFA intends to offer complimentary registration at their annual conference in recognition of the role of panel members.

The Certification Panel shall have a chairperson. The chair shall be decided by consensus by the four members of the Panel.

The Chair shall have a deliberative and if required, a casting vote. A quorum of the four member Panel should be two.

The Auditor may facilitate Panel meetings. Meeting may be by teleconference or similar web based audio/video conferencing.

### 3.5. Annual Ecoefficiency Benchmarking

The annual ecoefficiency benchmarking will be undertaken by all farms annually around October each year for the previous financial year. This allows an overall industry benchmarking and comparison for each farm against their previous years and within the industry.

The Auditor will send out the Ecoefficiency Benchmarking surveys and compile the results. NOTE: The auditor must keep the individual farm results confidential and reporting must report indices without identifying farms. Records must be kept to allow reporting back to each farm of comparison from their most recent years' and previous year's results.

To avoid any doubt, the Ecoefficiency Benchmarking should normally happen in July/August each year, regardless of the anniversary of a farm's certification process.

### 3.6. Certification Application Process

#### 3.6.1. Compliance

To gain Sustainable Barramundi/Prawn Farming Certification a farm must meet all criteria unless the criteria is irrelevant and could not be applied to the farms type or situation. In the event that a farm considers it not practical or financially viable to meet or partially meet a criteria it may seek an exemption, but in such circumstance must still show how it achieves the relevant principle for that aspect.

The claim for any exemption must be noted on the audit report and specifically considered (and accepted or rejected) by the Certification Panel.

#### 3.6.2. Application by Farmer

The application process involves submission to the ABFA/APFA Sustainability Certification Auditor of the **Ecoefficiency Benchmarking**, **Sustainability Checklist** and **Risk Assessment** along with other **supporting evidence** to support with the application for Sustainability Certification to the ABFA/APFA Sustainability Auditor.



### 3.6.3. Supporting Evidence

The Farm must also submit supporting evidence with the Certification Application assessment checklist. Such evidence may include (but is not limited to):

- The Farm's signed Sustainability Policy;
- Available evidence of ecoefficiency benchmarking records and calculations of benchmarking data;
- Any environmental program, action plan or environmental management system;
- Evidence of staff awareness and training (for all but micro-businesses with few staff, where awareness will be confirmed at audit);
- Evidence of compliance (e.g. copies of permits licences and any required records, monitoring or reporting to authorities);
- In addition to documentation, photographs/maps/plans are highly desirable.

Photographs of the sites (also any plans of the site, ponds and buildings);

- Photographs of Chemical/fuel storage(s);
- Photographs of solid waste storage and disposal (if on site);
- Photographs of settlement ponds and discharge points.
- Photographs supporting claims made in the checklist (e.g. energy efficiency measures etc.).

### 3.7. Initial Offsite Audit

An initial offsite audit is undertaken by the approved ABFA/APFA Sustainability Certification Auditor on the basis of the Ecoefficiency Benchmarking, Sustainability Checklist and Risk Assessment and supporting evidence.

The Auditor firstly ensures the application is complete and adequate supporting evidence is provided, if not, the Auditor sends a request by email to the farm for further information.

The initial offsite audit involves thorough review of the application and supporting evidence and an interview with the farm manger and at least one key staff. Wherever practical the Auditor should seek other verification of the compliance with the Sustainable Barramundi/Prawn Farming Certification criteria.

The Auditor makes a recommendation to the Certification Panel.



### 3.8. Certification Panel

The Certification Panel considers the Auditors recommendation and confirms Certification, Certification Subject to Corrective Actions or declines Certification. The Certification Panel does not undertake any primary investigation but relies on the Auditors Report, in exceptional circumstances the panel may review the application and relevant supporting evidence.

### 3.9. Onsite Audit

An **onsite audit** will then be required within two years of the initial certification. After this initial audit a further **onsite audit** is required every 2–3 years. The Auditor makes a report which is considered by the Certification Panel and continued certification is offered (which may be conditional on corrective actions).

#### 3.9.1. Annual Return

An Annual Return and annual Ecoefficiency Benchmarking is required each year. Re-completion of the whole checklist is required every 2 years, along with a recertification process including an offsite assessment.

### 3.10. Certification and Audit Policy

The ABFA and APFA Boards adopt the following policy:

1. Auditing is considered an essential component of the Australian Sustainable Barramundi/Prawn Farming Certification programs.
2. Recognising the significant cost of audits, the ABFA/APFA will endeavour to implement as comprehensive and cost effective audit program as ABFA/APFA resources allow.
3. Audits may take a number of forms:
  - Site Audits: inspecting farms, site conditions and their management practices, reviewing document and records, interviewing key staff.
  - Offsite Audits: mainly involving interviews with key staff and review of documents.
4. A formal interview with senior management (e.g. the owner or farm manager) addressing all claims made against the criteria is a fundamental aspect of onsite and offsite Audits.
5. Interviews with farm staff that undertake farm management activities should be included in all audits, to ascertain staff awareness of ecoefficiency and sustainability best practices for the farm and risk and compliance management procedures.



6. Auditor(s) will be appointed by the Presidents of ABFA/APFA in consultation with the Certification Panel chair. The following requirements are considered essential:
  - A thorough understanding of the principles of sustainability and ecoefficiency as it applies to finfish aquaculture, and the intent of the Australian Sustainable Barramundi/Prawn Farming Certification criteria.
  - Experience with aquaculture and specifically practical experience in achieving sustainability and ecoefficiency.
  - Experience in undertaking environmental audits.
  - An degree in environmental studies or similar.

Further to the above, auditors must be available to travel to sites and undertake audits at times convenient to farms and then promptly provide reports to both the farms and Certification Panel.

7. After the initial offsite audit for first certification, audits should be scheduled on an essentially random basis. However, audits may be scheduled opportunistically when an auditor is travelling in an area. Audits may also be scheduled where the ABFA Board or Certification Panel have reason to believe that there may be non-compliance (e.g. neighbour complaints).
8. Farms will receive a minimum of 14 days notice of a pending audit. Farms may suggest audit times that suit harvesting and processing operations and other farm imperatives, but must attempt to meet the Auditors travel itinerary. It is not intended that specific operations or arrangements be made for audits, however all relevant staff and machinery must be available for inspection/interview. If a mutually agreed time cannot be agreed within 30 days of receiving notice of a pending audit, certification may be withdrawn.
9. The Auditor must make findings that address compliance with criteria and the risk assessment. Auditors should identify areas of best practice and if there is any aspects worthy is a potential award or certificate of merit.



10. Where an auditor makes findings of non compliance with criteria there are three options:

- Where a principle of sustainable barramundi/prawn farming is not being addressed and/or there is a blatant disregard for particular criteria, which were claimed as being addressed, the Auditor may recommend not granting or the immediate withdrawal of certification.
- In the case of the above, major corrective actions will be documented and be required to be addressed prior to certification.
- Where a principle of sustainable barramundi/prawn farming is not being fully addressed as evidenced through non-compliance with particular criteria the Auditor may recommend a corrective action process by the certified farm (usually to achieve compliance within 3 months).

NOTE To avoid any doubt, if there is major non-compliances with more than one principle of sustainable Barramundi/Prawn farming not granting or withdrawal of certification should be recommended.

11. Where corrective action is required, the farm must agree in writing to the corrective action program within 14 days of receiving written notice by the Auditor.

### **3.10.1. Rejection or Withdrawal of Certification**

12. Rejection of certification or withdrawal of certification may only be made by a decision of the Certification Panel. The Panel must make such a decision in consultation with the auditor and may consult the President of ABFA/APFA (as relevant) on matters of policy and interpretation of criteria.

NOTE: Should any member of the Panel have a conflict of interest in the decision, an ABFA/APFA Board member (as relevant) without a conflict of interest conflict of interest may be co-opted to the Panel for the deliberations.

### **3.10.2. Review of Decision Not to Grant or Withdrawal of Certification**

13. A farm may request a review of a decision to not to confer or to withdraw their certification (or of the pre-assessment or post assessment certification processes) in writing to the President of the Australian Barramundi or Prawn Farmers Association (as relevant) within 28 days of receipt of the decision to withdraw certification. The (relevant) President will review the original Panel decision and then make a decision within 28 days of receiving the appeal. The President must consult with the Chair of the Certification Panel regarding the reasons for not conferring or withdrawal of certification and may consult with the Auditor.



NOTE: Should the relevant President have a conflict of interest in the decision. They shall delegate the decision to another office holder without a conflict of interest (the first of the Vice President, then Secretary, then Treasurer and the ordinary committee members of the ABFA/APFA without a conflict of interest must conduct the review and then make the decision).

### **3.10.3. Appeals**

If a farm or another member of ABFA/APFA is dissatisfied with a decision to confer, not confer or withdraw certification (or of the pre-assessment or post assessment certification processes) the dissatisfied member may request an appeal.

The Presidents of ABFA and/or APFA shall appoint an independent mediator who is a member of the Institute of Arbitrators & Mediators Australia to adjudicate.

All appeal costs borne by the appellant and ABFA/APFA shall be met by the appellant regardless of the outcome.

### **3.11. Re-audits**

Should there be a need for re-auditing to confirm compliance after a corrective action program, the Farm must meet all associated costs of the re-audit. Wherever possible the Auditor should seek offsite verification by the Farm (photographs, documents etc.) to verify corrective actions.

#### **3.11.1. Audit Policy Review**

This policy will be reviewed and reaffirmed at each Annual General Meetings of the Australian Barramundi Farmers Association and the Australian Prawn Farmers Association.

#### **3.11.2. Defining a Sustainable Farming On-Site Audit**

A Sustainable Barramundi/Prawn Farming Audit is an assessment of the level of compliance by a Farm with the criteria claimed as being met in an Farms certification application. Further, it involves an assessment of the product against current best practice barramundi/prawn farming. In essence, the purpose of an Sustainable Barramundi Farming audit is to accomplish the following:

- Assess the achievement of the principles of Sustainable Barramundi/Prawn farming.
- Verify compliance of the Farm's operations and practices with the certification criteria.
- Assess the risks of environmental harm and identify obvious adverse environmental, social, economic and cultural impacts from practices conducted by the Farm and therefore verify the adequacy of the risk assessment.
- Identify opportunities for continual improvement to achieve the principles of sustainable barramundi/prawn farming.
- Recognition of best practice.



NOTE: The Auditor's role is not to undertake a legal compliance assessment, however the auditor needs to be satisfied the Farm meets its statutory obligations and permit conditions. Attention is drawn to Environmental Duty and obligations to notify imposed by local legislation (such as those established by Queensland's *Environmental Protection Act 1994*) which may require an Auditor to formally notify a farm if they observe environmental harm, the potential for environmental harm or statutory non-compliance. Similarly, the auditor is not able to determine whether or not the farm has or has had any disease outbreaks, but should be satisfied that there is proper management to avoid or mitigate and report disease in accordance with statutory requirements.

### **3.11.3. Fundamental Basis of Audit – the Principles**

The fundamental test for the Audit is whether the principles of sustainable barramundi/prawn farming are being met by the farm. The framework to evaluate the compliance with the principles is the criteria as set out in the Certification manual, however where a criteria is not applicable and where a farm has an alternative approach, the assessment of fundamental compliance should be against the principles.

### **3.11.4. Fundamental Approach**

A Sustainable Barramundi/Prawn Farming audit involves analysis, confirmation of procedures and practices by observation, inspection of the farm and infrastructure, review of documentation and obtaining oral confirmation and commitment by manager(s) and/or staff.

### **3.11.5. Auditor Discretion**

Auditing is a very sensitive process and must be undertaken on the basis of identifying opportunities for compliance with criteria implementing best practices rather than focussing on non-compliance. Having said that, the Auditor has limited discretion, auditors must apply the sustainable Barramundi/Prawn farming criteria in a consistent and equitable way. In this light the Auditor has discretion only to evaluate compliance with criteria, when there is any doubt, the criteria must be interpreted literally. There is likely to occasionally be doubt owing to the unique circumstances of a particular farm, in this instance the auditor may exercise discretion where it is not prudent or feasible for the product to meet the criteria. This discretion must be implemented to the extent that the product must still be achieving the principles of sustainable Barramundi/Prawn farming.

### **3.11.6. Continual Improvement Approach**

The identification of opportunities for improvement of a Farm toward achieving best practice in each of the principles sustainable Barramundi/Prawn farming is an important aspect to an audit. Further, the Auditor should identify where the audited farm is implementing best practices.

The Auditor should raise new or innovative best practices for the attention of Certification Panel.





### **3.11.7. Continual Improvement of Criteria**

A further and important aspect of auditing is feedback on the criteria. Often a criterion doesn't apply to a Farm, or the literal meaning of a criterion results in it being difficult or onerous to comply with for a type of farm or activity. Auditors should note these and they will be taken into account when the criteria are revised.

## **3.12. Audit Types**

One aspect of the Sustainable Barramundi/Prawn Farming Certification program is the ability to undertake two types of audits with a view to rigorous, yet cost effective audit methodologies being applied.

### **3.12.1. Site Audit**

The site audit involves actually experiencing the tourism product first hand.

The fundamental assumption with a site audit is that the auditor has personally experienced and observed the Farm to the extent necessary to enable conclusions to be drawn about compliance with the Sustainable Barramundi/Prawn Farming criteria.

The site audit involves an interview with Farm management and at least select staff.

This audit type is the most rigorous and most preferable, however is not always possible owing to the cost and logistical practicalities.

### **3.12.2. Offsite Audit**

The Offsite Audit is essentially an office-based review of the products compliance with certification criteria. It involves offsite review of documentation and systems to provide evidence of compliance with the criteria. The offsite audit relies heavily on management interview and secondary evidence of compliance (e.g. photographs of sites, documents such as plans and monitoring data etc).

## **3.13. ABFA/APFA Administration Responsibilities**

### **3.13.1. Ongoing Office Administration**

The administrative systems in the ABFA/APFA office need to include:

- Keeping complete files of certification applications, other supporting information and the results of certification (including requests for and verification of corrective actions) must be maintained in the ABFA's office. NOTE: Apart from Certification Panel use, these should be kept confidential.
- ABFA requesting and compiling Annual returns and followed up after 30 days.
- Once the audit is completed and the auditor has sent the audit findings to the Certification Panel, the ABFA office keeps records of the Panel's deliberations and sends the notice of Certification (subject to any corrective actions) or decline of certification to the Farm.



### 3.14. Auditors Responsibilities

The Auditor has a unique responsibility; they are often the first ABFA/APFA related person who has visited a site. The auditor must remember that they are essentially an ambassador of the Sustainably Farmed Barramundi/Prawn Certification Program and they should do their utmost to encourage ongoing support for the program.

The Auditors responsibilities for offsite and onsite audits are:

- Confirm that they do not have a conflict of interest in undertaking the audit.
- Make arrangements with the Farm to undertake the audit at a mutually acceptable time (by email/telephone).
- Advise the Farm by email of the confirmed date of the audit and the auditors understanding of any travel/logistical arrangements.
- Reconfirm the audit with the Farm not less than 24 hours of the audit (by phone/email).
- Ensure the package of copies of the original certification application, any supporting evidence supplied and details of the original assessment
- and/or results of previous audits have been received from the ABFA Office and are reviewed prior to the audit.
- Undertake the audit in accordance with this protocol and in a professional and courteous manner.
- Provide oral advice of the preliminary Audit Findings to management at completion of the audit.
- Report the Audit Findings in the agreed format within 7 days of undertaking the audit.
- Provide further advice (if requested) to the Certification Panel in the event of a recommendation for withdrawal of certification and/or an appeal against audit findings.

#### 3.14.1. Notice to Auditee (Farm)

Scheduling of each audit should be undertaken by the Auditor, initially by email or telephone, then confirmed with an email. When the audit notice exceeds two weeks, a confirmatory email/fax should be sent 24 hours before the audit.

The process of scheduling audits is time consuming, and auditors should ensure they allow sufficient time for this task in the period of the lead time prior to undertaking the audit.

Auditors should be as flexible as possible particularly when the Farm has limited capacity or is in peak periods.



### **3.14.2. Managerial Interview**

Management interviews are an essential component of all Audits. The most senior manager should be interviewed about the Farm's compliance with criteria. The process usually involves going through the criteria and asking management to explain how criteria are met:

- The primary management interview should be with the owner, chief executive officer, managing director or farm manager. In other words the highest level of management possible.
- Where another person completed the original application for certification, wherever possible they should be available.
- Where practical it is best to complete the management interview prior to undertaking a tour or site inspection.
- Where the audit is an offsite one, evidence of compliance with criteria needs to be requested as much as possible. This may include, pictures, data, reports etc.
- The auditor should insist on undivided attention in a quiet location for the interview.

In addition interviews with other staff often provide important inputs to the Audit. Such incidental interviews of staff should be fairly casual and relate to the individuals responsibilities. No staff member should be put into a position of incriminating the Farm in front of a manager/supervisor.

### **3.14.3. Site Inspections**

The site inspection is a very important component of on-site audits. For farms, the inspection enables review of the actual infrastructure establishing compliance with criteria. The day chosen for the site inspection would ideally be one in which all of the key site personnel that are to be interviewed are on site and normal activities are being undertaken.

### **3.14.4. Documentation**

The review of documentary evidence of compliance with criteria is a key aspect of the audit methodology. Auditors will often have to have the documents sent after the audit, however it is far preferable to just sight the documents rather than keep copies. Where copies are required, if possible just copy the table of contents or specific excerpts.

### **3.14.5. Offsite Audits**

The off-site audits essentially need rigorous managerial interviews, these types of audits are not preferable and should be augmented with on-site audits as soon as practicable.



### 3.14.6. Audit Findings

It is important that audit findings are recorded accurately, based on facts, not biased opinion and are repeatable. That is to say that should another auditor undertake an audit and find the same facts that the audit findings would be similar.

The following template should be used for audit findings. NOTE many paragraphs will not be relevant, use those that are.

#### **Example Audit Findings (Insert Farm Name)**

##### **Auditor: Name**

##### **Site/Desk Audit**

*On xxxdate a Sustainably Farmed Barramundi/Prawn Certification audit of XXXFarmname was undertaken by site inspection, and/or interviewing the XXXposition (XXXName ).*

*The audit was undertaken against the claims made by XXXFarmname in their application for certification dated XXXdate, with investigations based on reference to documents provided at the audit, observations and discussions.*

*XXXinsertgeneraldescription andcommentshere*

*The audited Farm XXXproductname was found to comply with all necessary criteria required for certification under the Sustainable Barramundi/Prawn Farming Certification Program.*

*OR*

*The audited Farm XXname was found to comply with most criteria required for certification under the Sustainable Barramundi/Prawn Farming Certification Program. However, identified non compliance with criteria includes:*

- *XXXdescribecriteria; and*
- *XXXfinalcriteria.*

*There are numerous areas where XXXcompanyname is exhibiting innovative best practice, these include:*

- *XXXdescribebestpractice; and*
- *XXXfinalcriteria.*

*In terms of ecoefficiency benchmarking ... XXXinsert results of Farm benchmarks against industry norms and against change from previous years for the farm's reporting.*

*It is recommended that the Sustainable Barramundi/Prawn Farming Certified status of XXfamname be granted/retained/ withdrawn/ subject to the following corrective actions:*

- *XXXcorrectiveaction and due date; and*
- *XXXcorrectiveaction and due date.*



*From the audit, there is an opportunity to improve the achievement of sustainable barramundi/prawn farming principles by:*

- *XXXimprovementsaction; and*
- *XXXfinalimprovementaction.*

### **3.14.7. Corrective Actions**

The Recommendation of the Auditor to the Certification Panel may be conditional upon corrective actions being remedied within certain timeframes. The farm may comment on the corrective actions or provide additional information, and must formally accept and undertake to remedy any corrective actions prior to certification being granted.

### **3.14.8. Audit Effort**

The actual time and effort undertaken by Auditors to undertake an audits varies widely depending upon location, types of audit and preparedness by the auditee. Some audits require almost a day's travel each way for the auditor, then a day to undertake the farm inspection, whereas other audits could be undertaken with minimal travel time and four hours for a thorough site inspection and management interview.

The write up of results takes about two to six hours after the audit. There is often some additional time required to chase then review additional documentation from auditees (where essential documentation isn't provided at audit) or to undertake staff interviews.

In summary, some audits take a total effort of less than one day, whereas others take two or more days! Unfortunately, the remoteness of some barramundi/prawn farms results in a need for travel, and it is often the remote sites, which are the most important for site inspections owing to the conservation values of such areas.

## **3.15. Withdrawal of Certification**

The Certification Panel has a unique responsibility for withdrawal of certification, this may only be made by a decision of the Panel in consultation with the relevant President of ABFA/APFA.

### **3.15.1. Appeals - ABFA/APFA President**

A certified farmer may appeal a decision to withdraw their certification in writing to the President of ABFA/APFA. The President has a responsibility to make a decision within 28 days of receiving the appeal. The President must consult with the Certification Panel regarding the reasons for withdrawal of certification and may consult with the Auditor regarding policy and interpretation of criteria. The President's decision is binding, and may not be appealed. The President must provide written advice of the decision to the appellant, the auditor.

NOTE: should the President have a conflict of interest in the decision, the Vice President, then Secretary then Treasurer of the ABFA/APFA, the first without a conflict of interest has the responsibility to make the decision.



### 3.15.2. Supporting Evidence

The Farm must also submit supporting evidence with the Certification Application assessment checklist. Such evidence may include (but is not limited to):

- The Farm's signed Sustainability Policy
- Available evidence of ecoefficiency benchmarking records and calculations of benchmarking data;
- Any environmental program, action plan or environmental management system;
- Evidence of staff awareness and training (for all but micro-businesses with few staff);
- Evidence of compliance (e.g. copies of permits licences and any required records, monitoring or reporting to authorities);

In addition to documentation, photographs/maps/plans are highly desirable:

Photographs of the sites (also any plans of the site, ponds and buildings);

- Photographs of Chemical/fuel storage(s);
- Photographs of solid waste storage and disposal (if on site);
- Photographs of settlement ponds and discharge points.
- Photographs supporting claims made in the checklist (e.g. energy efficiency measures etc.).

NOTE: Some farms may opt to pay for the optional on-site audit for initial certification. In this case the above documentation does not need to be submitted with the Certification Application, rather it must be available to be sighted and reviewed by the Auditor.

As part of the off site assessment and on site audit process the Assessor/Auditor may identify corrective actions and/or observations.

### 3.16. Verification

Verification of procedures and records should be undertaken by the ABFA CEO on a regular and ongoing basis.

### 3.17. Program Validation

To satisfy itself of the validity of the program undertaken by its Auditors and certification panel the ABFA/APFA board should have a separate open discussions with the Auditor and/or the Certification Panel at least annually.

When resources permit and the program is well established (say at least 20 farms certified). ABFA/APFA should seek a third party review of the administration and validity of the program.



## 4. Support and Training

### 4.1. Ongoing Support

Whilst it is acceptable for an Auditor to provide training, it is inappropriate for the Auditor to provide an advisory service to potential auditees. Given this, the ABFA/APFA CEOs and board members will need to provide any ongoing support to Farms.

### 4.2. Annual Training and Development Workshop

It is suggested that a half day session on the Barramundi/Prawn farming certification system be held annually concurrently with the annual conference or the regular research and development workshops.

The session should be attended by the Auditor, Certification Panel (at least the Chair), the ABFA/APFA CEO's and ABFA/APFA Boards (at least the Presidents). Performance of the current program, administration policies and criteria should be discussed. The Auditor should be asked to provide overall feedback on the Ecoefficiency benchmarking and observation for best practice innovation and potential criteria change after their experience auditing.





## 5. Promotion

### 5.1. Logo

The Logo forms the functional recognition for certified products and needs to clearly depict environmental/sustainability endorsement to the retail chain and end consumers.

NOTE: International practice is to include a date on logos to indicate when the product was last re-certified. We suggest that the use of the logo be restricted to products whilst they are certified (e.g. for placing stickers on consumer packaging) and for other material (e.g. boxes) the logo must not be used six months after certification ceases.

### 5.2. Promotion of Program

ABFA/APFA will need to undertake a wide range of media promotion to gain editorial level publicity of the program. It is suggested that a launch occur once at least four-five farms are certified. The publicity will also serve to encourage ABFA/APFA members to be certified and may even encourage other barramundi and prawn farmers into ABFA/APFA membership and certification.

Individual promotion of each farm as it gets certified can aid publicity in the early days whilst the program is still new and gains editorial support.

Should resources permit ABFA/APFA's promotion should focus on the seafood distribution and retail industry to encourage their preference for certified product owing to its quality and sustainability credentials. Seeking major retailers endorsement would be a major benefit but is unlikely until the program is established and has a modicum of recognition and a history of integrity.

The annual awards also provide a potential ability to gain editorial coverage of the programs and the sustainability of farmed barramundi/prawns.





## 6. Annual Awards

As a key part of the overall Sustainable Barramundi and Prawn Farming Certification Program there will be annual awards. The current awards given out are....

*Need to insert details from current ABFA awards*

From 2016 it is proposed to have two major annual awards:

- Barramundi Farming Sustainability Award
- Prawn Farming Sustainability Award
- Sustainability Certificates of Merit

The purpose of these awards to promote innovation with sustainability and ecoefficiency and the sharing of information between farms.

Farms that have achieved Sustainability Certification are eligible for the awards.

It is intended that this award is awarded to one farm every year.

A logo (similar to the Certification logo) with the words “Australian Barramundi/Prawn Farming 20xx Ecoefficiency Award” will be provided and may be used by the farm on its product the for two years immediately following the granting of the award. The farmer may use the award on farm and product promotion material and may (at their own cost) provide retailers with small stickers with the logo for consumer packaging. The logo may be in dark solid colour (blue or green, black etc.) on a plain background.

### 6.1.1. Prawn/Barramundi Farming Sustainability Awards

*NOTE: Farms do not specifically apply for this award, they are automatically assessed when they submit their ecoefficiency benchmarking data. This will add an incentive for farmers to lodge their ecoefficiency benchmarking data in a timely manner.*

Farms must have had a recent audit and completed their most recent ecoefficiency survey to ensure the overall sustainability of the farm and to avoid embarrassment of ABFA/APFA and bring the integrity of the awards system and/or the Sustainability Certification program into disrepute.

The key criteria is that:

*For the 20xx year the XXX farm exhibited innovative best practice sustainability (and/or) ecoefficiency in the framing of prawns/barramundi which provides a model for the Barramundi and Prawn Farming Industry in Australia.*

The Farm must also be certified, have been recently audited and provide adequate evidence of their claims of best practice and its success in achieving ecological sustainability and/or ecoefficiency.



An award does not need to be made every year, and should the Certification Panel decide that no applicant or nominee meets the key criteria no award should be issued. Similarly, if in any one year two or more farms have exceptional applications/nominations the Certification Panel may chose to award two (or more) Sustainability Awards in any one year, however this should be only in exceptional circumstances.

The Certification Panel must make a specific citation for each award and recommend this to the ABFA/APFA boards (whichever is relevant) for endorsement prior to issuing the award. The chair of the Certification Panel shall communicate directly with non-affected board members in the event that a board member is a potential recipient or in any other way has an overt conflict of interest in the recommended award.

A logo (similar to the Certification logo) with the words “Australian Prawn/ Barramundi/Prawn 20xx Sustainability Award” will be provided and may be used by the farm on its product the for two years immediately following the granting of the award. The farmer may use the award on farm and product promotion material and may (at their own cost) provide retailers with small stickers with the logo for consumer packaging. The logo may be in any colour including gold embossed where appropriate.

### **6.1.3. Certificates of Merit**

The Certification Panel may nominate "certificates of merit" to Farms which are considered for the sustainability award and/or from the outcomes of the Ecoefficiency award process. The criteria should be as above with a lower level threshold and issues for encouragement/recognition rather than full attainment.

Farmers may also nominate key staff for their role in suggesting or implementing sustainability and/or ecoefficiency initiatives. The Certification Panel will consider these and may interview the nominee.

There are no limits to the number of "certificates of merit" that may be issued in any one year.

The Certification Panel must make a specific citation to go with each certificate.

No logo or seal is applicable and farms may only list in promotional material that the farm was awarded a certificate of merit and the citation for the award.



## 7. Continual Improvement

### 7.1.1. Initial Tweaking

It is usual for that the initial Audits and certification procedures raise many aspects requiring clarification. As such it is suggested that there be a planned review of the criteria once at least ten farms have been audited and certified, with at least five on-site audits undertaken.

This should be primarily about clarification, rather than any strengthening of criteria.

### 7.1.2. Phase In

It is suggested that any new criteria involving additional or more onerous aspects have a lead in time of two years. This timeframe has proven to be the minimum acceptable with other similar programs. By allowing an adequate lead in time, the criteria can be steadily strengthened to ensure that the criteria always represent best practice without causing undue hardship on the industry.

By committing to this longer lead time now, for any future program criteria change, participants can have confidence and business certainty in their investments etc.

### 7.1.3. Independent Review

It is suggested that after three or more years of operation, ABFA/APFA seek funding for and commission an independent review of the program and its effectiveness for achieving beyond compliance best practice sustainability and ecoefficiency Barramundi and Prawn farming.



## 8. Trade Mark Rules

### 8.1. Introduction

This section sets out the rules for the use and administration of the Sustainable Barramundi/Prawn logos.

### 8.2. Use of the Logo

Once a Farm is approved as certified by the Certification Panel the Farm will be provided with a licence to use the “Sustainable Barramundi” or “Sustainable Prawns” Logo. The key aspects of the license are:

- The “Sustainable Barramundi” or “Sustainable Prawns” Logo may only be used for the farm and product from the farm that has been the subject of the Audit and certification.
- The “Sustainable Barramundi” or “Sustainable Prawns” Logo may only be used on the colour and mono forms as provided by ABFA.
- “Sustainable Barramundi” or “Sustainable Prawns” Logo may be used on printed material, documents, digital media and on the internet for the farm provided it is clearly only relating to the activities of that Farm.
- “Sustainable Barramundi” or “Sustainable Prawns” Logo may be used by the farm on product packaging (boxes, consumer/retail labels etc.).
- The Farm must keep an original copy of each form of material the logo is used on (is. Box, label, document templates).
- In the event the Farm has its certification withdrawn by ABFA/APFA, the Logo must be immediately withdrawn from all digital and internet media, not used on any documents or promotional material. Existing stock of product packaging with the logo may only be used until the stock runs out of for six months, whichever is earlier.

### 8.3. Standards to Gain Certification

#### 8.3.1. Criteria

The criteria for certification are set out in the Sustainably Farmed Barramundi Certification Program Manual, version 2.0 or as revised and approved by the ABFA Board or the Sustainably Farmed Prawn Certification Program Manual, version X.x or as revised and approved by the APFA Board.

A Farm which is already certified will have two years to comply with any new or amended criteria.



### **8.3.2. Process to Gain Certification**

The process to gain certification is:

- 1) An application for certification is made by the Farmer as per section 3.6.
- 2) Annual certification ecoefficiency benchmarking survey has been completed as per section 3.5.
- 3) An initial onsite or offsite audits are undertaken by an ABFA/APFA approved auditor in accordance with sections 3.7, 3.9 and in compliance with the ABFA/APFA Audit Policy as per section 3.10 and responsibilities as per section 3.14.
- 4) The certification Panel considers the Audit report and confers certification (which may be subject to corrective actions) in accordance with section 3.8 and 3.10.1

### **8.3.3. Withdrawal of Certification**

Certification may be withdrawn as per section 3.10.1.

### **8.3.4. Annual Ecoefficiency Survey and Annual Return**

The ongoing certification requires the completion of the ecoefficiency survey and the annual return each year in accordance with sections 3.5 and 3.9.1.

### **8.3.5. Review of Decisions and Appeals**

The processes for a request for a review of decision and appeals are set out in sections 3.10.3, 3.10.2, 3.15.1 and 3.15.2.