

FIA PNG Lobster Group MSC CoC MANUAL



Port Moresby, Republic of Papua New Guinea

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First revision by FIA PNG MSC CoC team



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FIA PNG office has developed an MSC CoC (Chain of Custody) management system described in this FIA PNG MSC Group CoC manual, and the associated procedures and work instructions, to be compliant with MSC CoC Group requirements, FIA PNGO intends to follow a path of continuous and dynamic improvements and to guide the efforts of the Marine Stewardship Council towards the development of sustainable fisheries on a global basis. All FIA PNGO employees, fishing companies, and people involved in the MSC Group CoC process are required to follow the procedures referenced in PNA MSC CoC system documentation.

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ABREVIATIONS

CB	Certification Body
CoC	Chain of Custody
EEZ	Economic Exclusive Zone
EMTU	Enhanced Mobile Transmitting Units
FAME	Fisheries, Aquaculture and Marine Ecosystems
FAO	Food and Agriculture Organization
FIMS	Fisheries Information Management System
FIA	Fishing Industry Association
MSC	Marine Stewardship Council
MoU	Memorandum of Understanding
MTU	Mobile Transmitting Unit
NFA	National Fishery Agency
PNG	Republic of Papua New Guinea
SPC	Secretariat of the Pacific Countries
VMS	Vessel Monitoring System
WCPFC	Western and Central Pacific Fisheries Commission
TSA	Torres Strait Agreement





1 PNA MSC CoC Manual Maintenance and Control

1.1 Introduction

The primary objective of the FIA PNG MSC Group CoC manual is to document the agreement forms, policies, and procedures that support the chain of custody of the PNG Lobster processors and traders that depend of the FIA PNG MSC TS Lobster fishery. The Management Team Members will review this manual at least once per year. The review committee is comprised of:

- Stephanie Pokajam – MSC Group CoC Coordinator (Traceability and VMS), FIA PNG
- Nialingis Posanau – Sustainability and MSC Coordinator, FIA PNG
- Donald Papaol – CEO, FIA PNG
- Joseph Posy – Fisheries Manager – NFA
- Marcelo Hidalgo – Chief Operating Coordinator, FIA PNG

This is a living document and is reviewed on an ongoing basis.

The MSC Group CoC coordinator will ensure proper document control of the revised Manual of the FIA PNG.

1.2 FIA PNG MSC Group CoC Manual Distribution:

The FIA PNG MSC Group CoC Representative (Traceability and VMS coordinator) will maintain the MSC Group CoC Manual of FIA PNG approved master copy. A soft copy will be accessible as a "Read Only" online document on a shared drive or controlled copies are under distribution control and available to other team members.

Copies of the FIA PNG MSC Group CoC Manual given to customers and other interested parties are stamped listed and controlled by the FIA PNG office.

Any change or update done in the FIA PNG MSC Group CoC management system documents, forms, and worksheets will be immediately informed via email to all FIA PNG Lobster MSC Group CoC scheme members involved in such changes or updates.

The FIA PNG Traceability and VMS coordinator, the Sustainability & CSR director, and the Sustainability and MSC Coordinator will be always in copy.

2.0 BACKGROUND

The FIA PNG MSC Group CoC Manual conforms to fulfill ISO 9001:2008 standards.

In keeping with the philosophy that the chain of custody of the FIA PNGO is an integral part of our policy plan and structure, we adopted this ISO standard to confirm our commitment to the development and improvement of our FIA PNG MSC Group CoC system. We shall fulfill with the MSC chain of custody standards, following the ISO9001:2008 guidelines. The MSC Group CoC Representative of the FIA PNGO is responsible for ensuring that the chain of custody management system is established, implemented, and maintained.

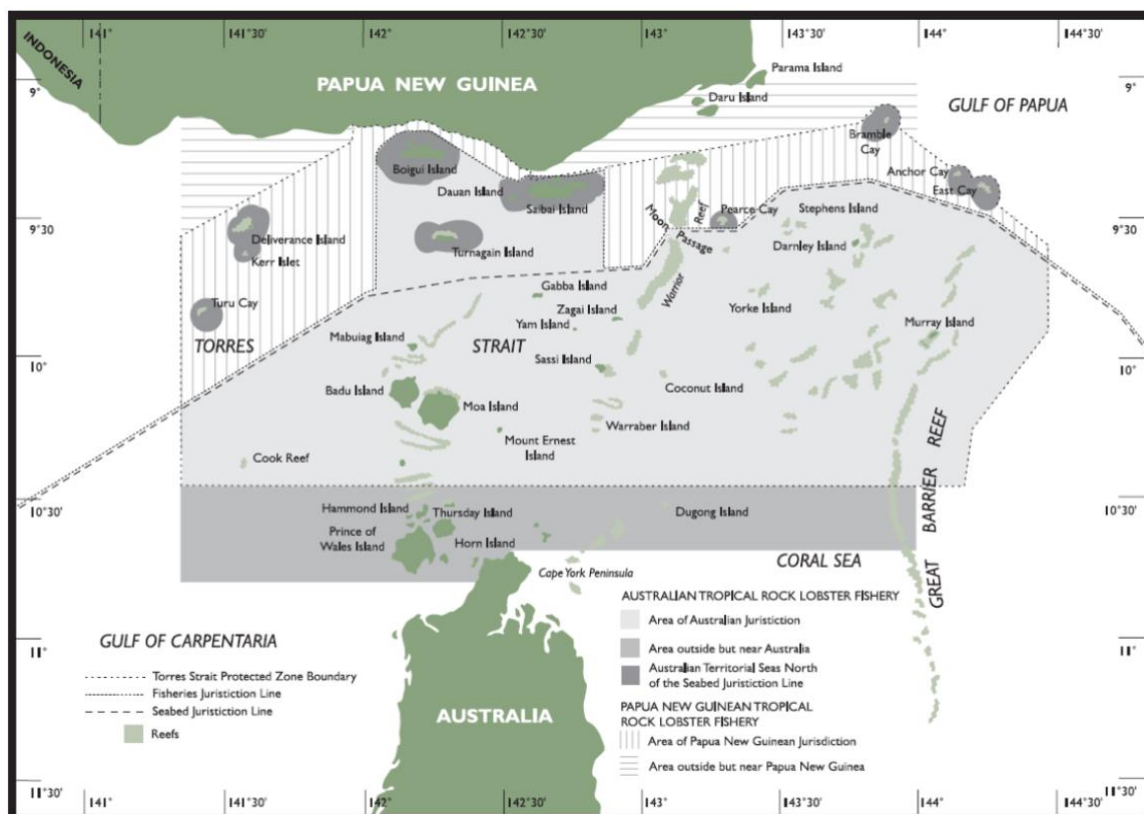
It is essential that we remain focused on assuring all the time and during all chains of the receiving and processing to keep separating MSC-certified Lobsters from non-MSC fish and avoid the risk of mixing them.

2.1 Scope

This FIA PNG MSC Group CoC manual is applicable to all the lobster operators – processing and trading which are registered at the FIA PNG office, located in Daru and in Port Moresby.

It also includes all Lobster-related facilities such as storage, transport – and traceability information for the buyers/retailers or final clients in Europe, the United States, Australia, and other important tuna markets.

Graph # 1: Map showing area of the PNG Torres Strait tropical rock lobster fishery (from the PZJA Annual Report)





3.0 References

ISO 9000:2008	Quality Management Systems – Fundamentals and Vocabulary
ISO 9001:2008	Quality Management Systems Requirements
ISO 9001:2008	Quality Management Systems: Guidelines for Performance Improvements
MSC	MSC Fishery Standard; Principles and Criteria for Sustainable Fishing.
MSC	MSC Group Chain of Custody Standard
FIA PNG	The FIA PNG MSC Group Chain of Custody – a need for our Lobster processors and exporters Desk review / Field data collection – First stage

4.0 FIA PNG MSC Group CoC management system surveillance

What is the MSC Chain of Custody?

Please watch this video <https://www.youtube.com/watch?v=YvwND3FLn-k&t=32s>

4.1 General Requirements

FIAO has established documented, implemented, and will maintain an MSC Group CoC management system and continually improve its effectiveness with the requirements of MSC environmental standards for sustainable fishing.

4.1.1 The FIA PNG MSC Group CoC management system is based upon the MSC principles and criteria for sustainable fishing (5 principles).

FIAO has developed this manual and procedures as a generic document to be implemented case by case to each site (processor or trader) that joins the FIA PNG Lobster Group MSC CoC certification.

Each site shall follow, adapt, implement, and monitor each of the 5 principles. Depending on the complexity of the site (processor or trader), the site should adapt it accordingly to the following principles:

PRINCIPLE 1 - Certified products are purchased from certified suppliers

1.1 The site shall have a process in place to ensure that all certified products are purchased from certified suppliers, fisheries, or farms.

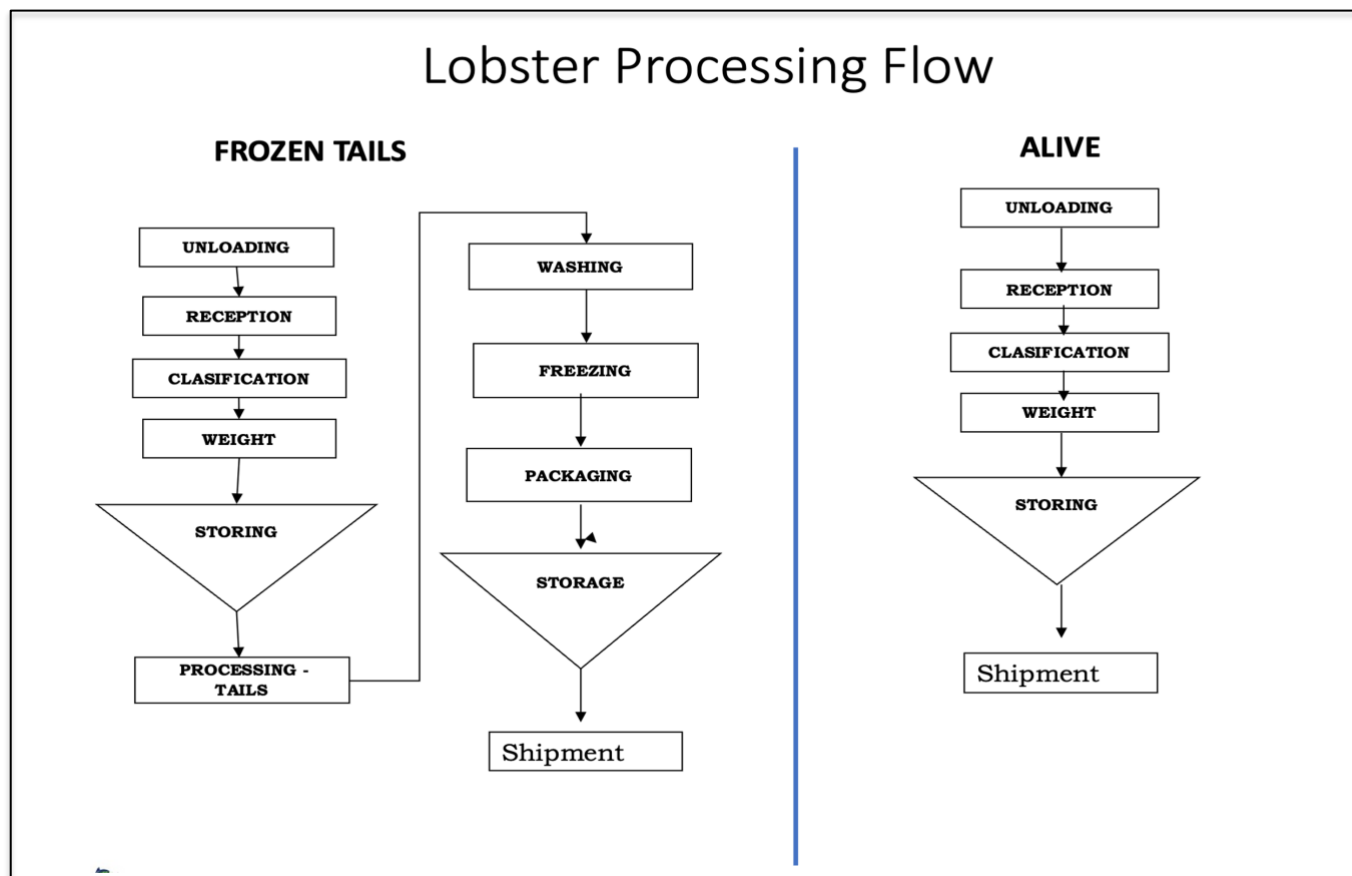
1.2 Each member shall verify that the fishery or farm has a valid fishery or farm certificate by asking the supplier (FIA PNG certified fishery), verifying that the fishery certificate code is valid, and

1.3 The fishery assessment or farm audit report on the MSC website is updated on a regular basis. Also, the site shall verify online that the species name is the same that is mentioned on the online report.

1.4 The site handling physical products shall have a process in place to maintain documentation related to the purchase transaction like invoices, FIA PNG certificates, NFA documents, records, etc.

The following principles are key principles to demonstrate that the site has implemented good strategies and tools for segregation, separation, and identification. Each site shall implement a practical clipboard, signs, and mark (e.g. blue) to identify MSC-certified Lobsters all the time in any process, transport, and storage stage. Hereby you will find a general description of the two (2) most common processes carried out in our Lobster Processors: Frozen tails and Alive Lobster.

Graph # 2: General flow of types of processing of Lobster final product



PRINCIPLE 2 - Certified products are identifiable

2.1 Certified products shall be identified as certified at all stages of purchasing, receiving, storing, processing, packing, labeling, selling, and delivering, except for sales invoices to final consumers.

Based on the current HACCP implemented system, Lobster processors shall implement a system to identify in each stage of the process the certified Lobster by signs, or clipboard in the processing line or tanks; by acronyms on the work orders, records, and delivery notes to clearly maintain consistency between records and processing signs.

2.2 If products are sold as certified, they shall be identifiable as certified on the line item of the related invoice, which means in the final invoice the site shall write and indicate next to the quantity of certified lobster that it is MSC certified product.



2.3 The site shall operate a system that ensures packaging material, labels, and other materials identifying products as certified can only be used for certified products.

A record to control quantities of packing material with the MSC logo shall be in place to demonstrate control of inputs and outputs of packing material, and labels; including damaged material.

2.4 Site operators and the responsible person shall verify the consistency of the MSC-certified lobster, with the species name, fishing area, and any related fishery certification information needed for transaction documents (e.i. invoices)

PRINCIPLE 3 - Certified products are segregated

3.1 Certified and non-certified products shall not be mixed if the site wishes to make a claim about these certified products, except If non-certified seafood is used as an ingredient in certified products, the organization shall follow the non-MSC/ASC certified seafood ingredients rules.

In the specific case of the FIA PNG MSC-certified lobster, sites (processors and traders) shall avoid mixing with non-certified Lobster, and have physically segregation devices like tanks, processing tables, and separated freezers where they can freeze, process, and store MSC-certified lobster from non-MSC lobster.

The risk and possibility that this happens in our MSC Group CoC certification is very low because we only source MSC-certified Lobster from one (1) certified fishery. However, our site members need to implement these measures in the reception, processing, and packing areas.

PRINCIPLE 4 - Certified products are traceable, and volumes are recorded

This requirement is very important and can be directly linked with the HACCP traceability procedure. Sites need to add, and implement the following:

4.1 The site shall have a traceability system that allows: a. Any product or batch sold as certified to be traced back from the sales invoice or point of serving to a certified supplier or export.

4.2 Traceability records shall be able to link certified products at every stage between purchase and sale, including receipt, processing, transport, packing, storage, dispatch and/or serving.

4.3 Records of certified products shall be accurate, complete, and unaltered. Where records are changed, these changes shall be clearly documented including the date and name or initials of the person making the changes.

4.4 The site shall maintain records that allow volume calculation of certified products. FIAO will assist sites in carrying out mass balance per batch, or in an annual basis. Mass balance is the control weight from reception minus the final weight at the moment of packing and/or export. The loss of part of the lobster shall be assessed and reported (conversion rates).

4.5 If processing or repacking occurs, records shall allow conversion rates for certified outputs from certified inputs over any given batch or time period to be calculated. Conversion rates for processing of certified products shall be justifiable and accurate.



4.6 The site shall maintain records that demonstrate conformity with this Standard for a minimum of 3 years, or for the full duration of the certified product's shelf life if longer than 3 years.

5.0 The FIA PNG MSC Group CoC Policy

The FIA PNG MSC Group CoC's policy (5 principles and MSC logo + FIA PNG logo) is displayed openly as a sign of our pride and commitment and as a clear reminder of our focus and direction.

FIA PNG MSC Group CoC policy is as follows:

"FIA PNG recognizes and engages in sourcing Lobster in a sustainable way; which means, fishing by hand from a fishery that is well-managed and according to the MSC fishery standard and the 3 principles.

To achieve this, FIAO has established and maintained a chain of custody system (document and electronic support) which is an integral part of the FIA PNG Lobster fishery certification and lobster processing and trader sector.

The FIA PNG MSC Group CoC will allow us to reliably trace MSC products back through the supply chain to the Torres Strati and the PNG waters where it originated.

And we will use our ecolabel MSC and fishery certification program to contribute to the health of the PNG waters and Western Central Pacific Ocean by recognizing and rewarding sustainable fishing practices"

The FIA PNG MSC Group CoC representative/ coordinator is responsible for the training of the staff so that they are kept abreast of any changes to the standards and are fully conversant with the FIA PNG MSC Group CoC policy & procedures. He or she is also responsible for the maintenance of all records associated with the implementation of the CoC policy according to the requirements set down in this document.



5.1 The FIA PNG MSC Group CoC Policy and Procedures

The FIA PNG Office (FIAO) is ultimately responsible for managing the Group CoC and ensuring MSC conditions are met. The FIAO uses this policy and procedures manual as the group entity to manage the 'sites' that form the members of this CoC.

5.1.1 The link between the Lobster fishery and Lobster processors

When a site intends to transport and sell MSC Lobster then the trip must be identified as an 'MSC trip' to ensure that sufficient evidence is available to demonstrate that no non-MSC Lobster has been mixed with MSC certified Lobster. MSC-certified Lobsters must be kept separated and distinguished from non-MSC Lobster at all times.

The following chain of custody (CoC) procedures have been developed to achieve the MSC's group certification requirements and avoid the risk of mixing non-MSC with MSC Lobster. There will be demonstrable and continually verified traceability from MSC Lobster (fishery) to MSC lobster transport and the reception of the MSC-certified Lobster. The FIAO must comply with these procedures and maintain accurate records in order to demonstrate compliance. This policy should apply to operations (sites) before and after the trial and is subject to change.

6. FIAO MSC Group CoC Responsibilities

- 1) Overall responsibility for traceability within the fishery and Chain of Custody point of contact for the MSC and Certification Body. Maintaining the group policy and procedure document, ensuring its implementation and keeping records. Paying fees of the certification body, adhering to CB requirements and for all communications with the CB. The Director takes responsibility for this role.
- 2) Ensure that each location at which MSC-certified lobster is handled complies with all MSC's requirements, which are primarily contained in the MSC Chain of Custody Standard. This includes managing who is included and excluded in the scope of certification and what material can be considered as MSC-certified Lobster.
- 3) Conduct an annual audit of every site. The audit will cover the competency of the site to ensure compliance with MSC and FIAO requirements, their control systems and the physical handling of material.
- 4) Sample audit dinging catches per season (landings).
- 5) The FIAO must demonstrate impartiality in audit and decision-making regarding site compliance. This is achieved by formally assessing potential conflicts of interest and ensuring there are no actual conflicts. The audit and decision-making are maintained demonstrably independent of financial pressures.
- 6) Approving "MSC Lobster batch" certificates.
- 7) For holding and maintaining contracts with sites. Managing group fees and duties.
- 8) Document control in terms of MSC and CB requirements being stored and circulated to the necessary sites.



9) The FIAO is responsible for the verification of Group CoC sites (processors and traders) and must nominate individuals to undertake these tasks.

10) The FIAO is responsible for the training program of the FIA PNG MSC Group CoC, quality of training control, and trainer quality control.

11) In addition to Site approval the FIAO must be confident of the Authority's ability to monitor and control its CoC effectively. This could be demonstrated by the Authority's attainment of EU CA approval.

12) FIAO shall cooperate closely with the National Fishery Authority in both at the fishery and at land monitoring processing sites.

6.1 FIA PNG MSC Group CoC Management System Planning

It is the responsibility of the FIA PNG MSC Group CoC management team to ensure, during the management review, that the FIA PNG MSC Group CoC planning is executed at FIAO. FIAO planning is performed to ensure that the necessary resources are available to achieve FIAO MSC Group CoC objectives. The FIAO MSC Group CoC planning assesses the following:

- The planning of the FIAO MSC Group CoC System is carried out in order to meet the requirements given in the MSC CoC standard.
- The integrity of the FIA PNG MSC management system is maintained when changes to the FIA PNG MSC management system are planned and implemented.

6.2 Responsibility and Authority

The organization chart summarizes how the FIA PNG MSC Team is structured to ensure the responsibilities and authorities are defined and communicated within the organization.

Responsibilities:

The MSC Group CoC Representative (and auditor) oversees the FIA PNG MSC Group CoC certification and the MSC CoC of sites/companies at their spot and onboard when this is needed.

The MSC representative will report directly to the FIA office and its directors. Authority for executing the requirements resides with the Chairman and President of FIAO.

6.2.1 FIA PNG MSC Representative or FIA PNG MSC Group CoC Coordinator

The FIA PNG MSC Group CoC Representative ensures that the FIA MSC CoC meets the requirements of MSC chain and custody, and controls the MSC Group CoC in all FIA PNG MSC members (sites), reports the MSC Group CoC performance to the management team and FIAO Director, and ensures the promotion of awareness of CoC requirements throughout the organization of audits, FIA PNG sites/member's meetings.



The FIA PNG MSC Group CoC Representative or Coordinator is also obligated to communicate and provide evidence of such communication to the FIAO, the importance of:

- Training and audits based on MSC CoC,
- Appropriate Training, monitoring and surveillance plans,
- Organize fishing companies' audits and processing audits
- Verify the MSC CoC in Factories, and traders (sites)
- Organize the FIA MSC Group CoC annual team meeting for evaluating the FIA PNG MSC Group Chain of custody and its system.

6.2.2 Internal Communication

Employees at the FIAO have sufficient authority and the organizational freedom to identify, document, and communicate any issues related to the processes of the FIA PNG MSC Group CoC management system and their effectiveness. Forms of communication shall be as follows:

- Meetings
- E-mails
- Periodic meetings with FIA MSC members, MSC managers (sites companies)
- Corrective action requests

6.3 Management review

6.3.1 General

A management review meeting shall be held at least once every 4 months.

The FIA PNG MSC representative shall chair all management review meetings. The Managers, who directly report to the FIA Director per the organizational chart or organigram, or their designee, shall attend all management reviews. At the management review meetings, the FIA PNG MSC Representative shall report on the performance of the FIA PNG MSC Group CoC management system, along with the opportunities for improvements and need for changes, to ensure the current suitability and effectiveness of the FIA PNG MSC CoC management system. The FIA PNG MSC CoC Representative or his/her designee shall maintain records of each review.

6.3.2 Review Input

- Data analysis of Fishing company's members
- Results of external audits/ inspections
- Status of corrective actions
- FIA MSC Group CoC plans for any non-routine project
- Data analysis on MSC CoC requirements applicable
- Planned changes that could affect the FIA MSC CoC management system
- Records for demonstrating FIA MSC CoC conformance with MSC CoC standard
- Follow-up actions from earlier management reviews
- Recommendations for improvement
- Training and evaluation effectiveness



- FIA PNG MSC Group CoC Policy

6.3.3 Review Output

The outputs from the management review shall include any decisions and actions related to:

- Improvement of the effectiveness of the FIA PNG MSC Group CoC management system and its processes,

7.0 Resource management

7.1 Human Resources

As part of the FIA PNG MSC Group CoC concept, human resources are very important for the PNA.

FIAO shall look after some of the interesting aspects of how the modern Coastal Small Scale industry system has evolved (and why), in terms of the working conditions, data collection and management of the fishery. The role of humans in the fishery has changed partly due to a better understanding of fishery and ocean factors, partly due to a better understanding of fishing and sustainable aspects that lead to better responsible management of the fishery.

The FIA MSC CoC system works through the integration of three components:

1. Physical processes (e.g. ports, fishing vessels, cold store, factories, traders).
2. Human resources policy (mechanisms and criteria for decision making, e.g. scheduling, auditing, control policies etc.). The FIA PNG MSC CoC will address and advise sites/companies to improve and implement the MSC CoC standard, and follow the guidelines for the sustainable management of the Lobster in the PNG waters.
3. Information technology (data/information stored about all aspects of the system and the supporting technology to maintain the data). The FIA PNG MSC on line system will record (Dingings, anchored platforms): FIAO authorized trip number, Company name, vessel's name, trip number, units caught (weight), storage in each well (Loading for carriers), and unloading data.

7.2 Awareness & Training

The management team has determined the necessary competence for personnel performing activities affecting the FIA PNG MSC Group COC system, and shall provide training for them. Throughout this training, personnel are made aware of the importance of their fishing/catching activities and how they contribute to the achievement of the total control of the Chain of custody of the Lobster caught or fish in the PNG waters

During the management review meeting the training shall be evaluated for its effectiveness of the actions taken to improve our training processes. Training records for each fishing company and its MSC Manager shall be recorded and maintained.