



Global Sustainable Seafood Initiative

Outcomes of GSSI Global Benchmark Tool Pilot Testing Program

March – August 2015

GSSI

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Introduction

This report summarizes the outcomes of the Pilot Testing Program that was carried out between March and August 2015 to test the updated GSSI Global Benchmark Tool published in April 2015. The GSSI Global Benchmark Tool outlines the process by which seafood certification schemes can be assessed against the *GSSI Requirements* and *GSSI Indicators*. This process is designed to ensure consistency between assessments and is carried out in an impartial and transparent manner by Independent Experts.

The objectives of the GSSI Pilot Testing Program were to:

- I. Validate the *GSSI Requirements* and *GSSI Indicators*
- II. Validate the proposed Benchmark Process
- III. Validate the time and costs of the Benchmark Process
- IV. Train Benchmark Committee members and contracted Independent Experts

The report focuses on these objectives and the feedback provided by the participating certification schemes and Independent Experts on the practicality and applicability of the GSSI Global Benchmark Tool. It also provides an overview of how the outcomes of the Pilot Testing Program have informed the process of updating the GSSI Global Benchmark Tool. This report does not include results of the individual certification schemes that collaborated with GSSI in the Pilot Testing Program.

In support of this summary report, an excel document is published which includes the detailed feedback collected during the Pilot Testing Program on the individual *GSSI Requirements* and *GSSI Indicators*.

The Pilot Testing Program was conducted in close collaboration with 8 seafood certification schemes from across the globe and 10 Independent Experts. GSSI wishes to thank all of them for making this possible, but in particular the certification schemes without whom's commitment, expertise and collaborative spirit it would not have been possible to collect the required feedback to improve and finalize the GSSI Global Benchmark Tool.

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1. Participants of the Pilot Testing Program

1.1 Participating Certification Schemes

Eight seafood certification schemes volunteered to participate in the GSSI Pilot Testing Program, following a public call for participation in the GSSI newsletter.

- Alaska Seafood Marketing Institute (ASMI)
- Aquaculture Stewardship Council (ASC)
- Global Aquaculture Alliance (GAA-BAP)
- Iceland Responsible Fisheries Foundation (IRFF)
- Indonesia Good Aquaculture Practices (IndoGAP)
- Marine Stewardship Council (MSC)
- Thai Agricultural Standard : TAS 7401-2014
- Vietnam Good Aquaculture Practices (VietGAP)

1.2 Independent Experts(IE)

To carry out the Pilot Test 10 Independent Experts have been selected on their technical expertise to best match the different Sections of the GSSI Global Benchmark Tool. Prior to being assigned to any certification schemes, all Independent Experts have declared their potential conflicts of interest, signed a confidentiality agreement and participated in a training on the GSSI Benchmarking Tool.

Process IE, Section A&B

Aimee Russillo has over twenty five years of experience in international sustainable development. She works with supply chain actors, NGOs and government actors to integrate sustainability into operations, strategic decision making and more effectively managing for impact under real world conditions. She is an expert on social and environmental standards and eco-labelling programs. She actively participates in several global benchmarking initiatives. With a joint MBA and JD, she is based in the US, having lived and worked in Europe, Latin America and Africa.

Sally Ananya Surangpimol (Haig-Brown), MSc, LFSA, LQA, SSA is a pioneer in standards-setting and conformity assessments for food exports and imports, with special focus on integrated management systems. Originally from the Philippines, she trained as a food scientist in Japan but for the past 30 years has made Thailand her base, assisting stakeholders within the global food supply chain. This has allowed enterprises and governments within Asia-Pacific, North America, Africa and EU, especially those in the high-risk fisheries and seafood sectors, to meet and/or develop industry and government requirements for visibility in international markets. Through The Food School and Food Partners programs, which she founded and runs as Director within her wholly-owned Thai company and a second base in Canada, she supports retailers, buyers, producers, associations, NGOs, UN agencies, by consultation or auditing or training, to develop or enhance food safety, quality, environmental and social systems initiatives, covering over 500 locations in 5 continents around the world.

Josie Foster is very well known to many as both a BRC Approved Training Provider and as an auditor. Having spent many years with Tesco she is well grounded in both aspects and has travelled the world training for the BRC. In addition to her many achievements she is also an assessor for UKAS, specialising in ISO 17065, primarily for the BRC Global Standard for Consumer Products. She also has her own business as a consultant, coach and mentor. The summary of Qualifications includes: ISO 9000 Lead Assessor qualification, ISO 22000 Lead Assessor qualification, RIPHH Advanced HACCP Certificate, CIEH Advanced Food Hygiene Certificate, BRC Food and Consumer

Products Auditor, Chartered Chemist and Member of the Royal Society of Chemistry, Chartered Scientist, Graduate of the Royal Society of Chemistry.

Julie Dearman has a background in manufacturing in both production and quality roles. She has worked in quality management systems auditing and certification roles for a number of UK retailers including Tesco. She has also undertaken sustainability, traceability and social systems audits. She has worked as an independent consultant and, as a lead auditor, has undertaken auditor training and trialled new audit standards for 3 major certification bodies. She has developed global supply chain standards and is currently carrying out a supply chain compliance review for Home Retail Group.

Technical IE, Section C-Aquaculture

Francis Murray (FM: UoS) is a member of the Sustainable Aquaculture Group with 25 years' experience in aquaculture related fields encompassing industry, academic research, rural development and consultancy. This has given him a broad inter-disciplinary perspective on the aquaculture sector and a detailed understanding of the interaction of market, technology, management, and the physical, social and economic environment. He has commercial experience in salmon production and a research background on integrated small-holder aquaculture systems in Asia and Africa, working with CARE International and the World Fish Centre. He was a co-ordinator of a highly inter-disciplinary EU-FP7 large-scale collaborative research-project 'Sustaining Ethical Aquaculture Trade' (SEAT: www.seatglobal.eu). This project assessed the sustainability of major export seafood commodity groups farmed in Asia acknowledging values and perspectives of stakeholders along entire value chains. He currently specialises in global value chain analysis and is in a Horizon2020 research consortium (PRIMEFISH) researching competitiveness of European aquaculture and fisheries. He also coordinates various research projects exploring novel approaches to reducing aquacultures dependency on marine feed ingredients.

John Hargreaves is an aquaculture expert with 35 years of experience in research, teaching and development. For the last 10 years, he has been a freelance consultant on commercial aquaculture and development projects, with expertise in water quality management, engineering design assessments and Best Management Practices. He has broad international experience in Latin America, Africa and the Middle East. He has worked with commercially important finfish, shellfish and crustaceans in a wide range of freshwater and marine production systems. He is also Editor-in-Chief of World Aquaculture magazine, a quarterly publication of the World Aquaculture Society.

Nigel Peacock has over 40 years experience working on most aspects of aquaculture and fisheries, including a wide range of seafood sector activities, many of which had a sustainability focus. This has included directing major fisheries management projects (eg management of the Peruvian anchoveta fishery – one of the world's largest) and involvement in numerous aquaculture schemes (salmon, shrimp, seabass & seabream, tilapia, pangasius). Experience of the broad spectrum of fisheries and aquaculture including feasibility assessment, market research, investors due diligence, trade analysis and the regulatory environment. Wide geographic range: Has worked in 95 countries globally in the Americas, Europe & Former Soviet Union, Africa, Middle East, Asia and Oceania.

Stephen Newman has a doctorate in marine microbiology and developed, licensed and marketed some of the first commercially available vaccines for salmonids. He operates a company providing a range of consulting services and select products to the international aquaculture community and has travelled and worked extensively with fish and shrimp farmers at all levels of the production process throughout Central and South America and SE Asia. He routinely conducts technical, operational, biosecurity and sustainability audits and works with a wide variety of companies interested in gaining access to the international aquaculture markets.

Technical IE, Section D-Fisheries

Joseph DeAlteris retired from the University of Rhode Island (URI) in May of 2012, and was awarded Professor Emeritus status. In 30 of service to URI he is taught course work, conducted research, and developed outreach programs in fisheries conservation engineering, fish population dynamics and quantitative ecology, and shellfish aquaculture. He mentored more than 40 graduate students completing MS and PhD degrees. He served on numerous government committees including the National Research Council. He authored more than 35 publications in peer-reviewed journals, and also authored and co-authored numerous books, manuals, non-referred articles, and technical reports in the fields of fisheries biology, stock assessment and fishing gear technology.

Kevin Stokes is a fisheries science, management, and policy consultant with extensive international and Pacific experience. He has worked at senior management levels in both the public and private sectors as a fisheries scientist, manager, and advisor. Kevin worked for the Ministry of Agriculture, Fisheries and Food (MAFF) and the Centre for Environment, Fisheries and Aquaculture Science (CEFAS) in the UK for 15 years. He was responsible for all finfish monitoring, assessment and advice and worked extensively in Europe, serving as chair of the EC Scientific, Technical and Economic Committee for Fisheries (STECF) and as UK representative on the International Council for the Exploration of the Sea (ICES) Advisory Committee for Fisheries Management (ACFM), as well as chairing working groups and committees. He served on multiple UK research councils, led the UK scientific delegation to the International Whaling Commission (IWC) and served as UK Alternate IWC Commissioner for many years. He served for many years as an *ad hominem* member of the UK Special Committee on Seals. Kevin worked as Chief Scientist for the New Zealand Seafood Industry Council (SeafIC) for 9 years, responsible for science policy and process as well as leading a consulting group drawing on diverse international expertise. He has worked on a wide range of marine shellfish and finfish, and environmental issues and has provided advice nationally and internationally at senior governmental and ministerial levels, as well as to fishing, processing and retail industries, and to NGOs. For nine years he chaired the New Zealand National Rock Lobster Management Group (NRLMG). Kevin was for many years a member of the New Zealand Institute of Directors and has worked on governance and strategy development projects, particularly in New Zealand. For the past 6 years, Kevin has worked as a private consultant in the general area of fisheries but extending to governance and wider advisory matters. He has worked extensively across the globe as well as in New Zealand, doing technical reviews; certification programme review and design work as well as certification assessment; governance review and design; and sustainability advice to retailers and processors. He has worked on Ecological Risk Assessment (ERA) design and implementation. In 2007 Kevin participated in the MSC Quality and Consistency work, reviewing advice on development of the new P1 standard, and as part of the group that led development of the new P2 and P3 standards. He has undertaken more than 60 MSC pre-assessments as well as acting as an assessor, auditor, and peer reviewer for multiple certification assessments, ranging from prawns to tunas. He has carried out work for a number of Certification Assessment Bodies (CABs). From late 2013 for one year, Kevin worked exclusively to Conservation International, leading development work on the Global Tuna Initiative, with a focus on the Western Central Pacific.

1.3 Benchmark Trainers

Kevin Swoffer (Food Safety Consultant) has over 40 years experience within the food manufacture and retail sectors, holding executive positions within Nestlé UK, Safeway Stores plc., the British Retail Consortium and NSF International. Kevin has been involved with the development of food safety standards since 1993, notably the British Retail Consortium (BRC) series of standards and the Safe and Local Supplier Approval scheme (SALSA). In 2009 he was appointed as an expert on food quality and safety private standards for United Nations Industrial Development Organization (UNIDO) and has worked with UNIDO and the World Bank's International Finance Corporation (IFC) on a number of projects relating to the development of food safety systems. The work with the GFSI, UNIDO and IFC has taken Kevin to a number of countries in recent years including US, Canada, Australia, China, India, Russia, Ukraine, Egypt, Sri Lanka, Lebanon, South Africa, Laos, Zambia, Tanzania, Kazakhstan and Malaysia. Kevin Swoffer, 59 years old, is a graduate in Food Science and is a Fellow of the Institute of Food Science and Technology.

Michèle Stark is an executive advisor at Seafood Advisory Ltd., a consultancy company providing support for sustainable seafood production, traceability along the supply chain, sustainable sourcing and certification. Before setting up the company Michèle Stark was a technical expert and lead auditor in aquaculture and fisheries at IMOSwiss AG (IMO) in Switzerland, as a result of which she acquired over 8 years of auditing, training and assessment experience worldwide. She formed the Department of Aquaculture and Fisheries at IMO and was its head for almost 10 years. In this position, she was also responsible for all accreditations relating to seafood standards, notably MSC fishery, MSC COC, GlobalG.A.P, AquaGAP, Naturland, Bio Suisse, EU organic, WFM (Whole Foods Market), ASC farm (tilapia, pangasius, salmon, shrimp), Friends of the Sea and others, in South East Asia, South America, USA/Canada and Europe. Michèle Stark is a marine biologist who has specialized in Estuarine and Coastal Science and Management. After working in biochemical analysis, wetland ecology, and risk assessment for some years, she joined IMO in 2006, then started up her own company Seafood Advisory Ltd. in 2015.

2. The Pilot Testing Program

2.1 Activities

The Pilot Testing Program was set up to follow the first 4 steps of the GSSI Benchmark Process. Benchmark Committee Meetings, Stakeholder Consultation and formal recognition by GSSI were not part of the Pilot Testing Program. A call for Benchmark Committee members was launched during the Seafood Show in Brussels and highly competent individuals across different stakeholder groups have been approved by the Steering Board. Training for the Benchmark Committee members will be conducted after the Tool has been finalized and is expected for October 2015.

The Pilot covers the first 4 Steps of the **Benchmark process**

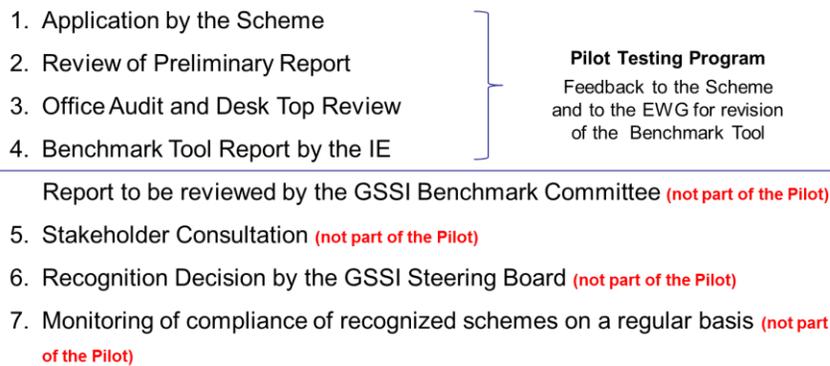


Fig. 1: GSSI Benchmark Process and steps followed in the Pilot Testing Program.

2.2 Timeline



Fig. 2: Timeline of the GSSI Pilot Testing Program.

3. Summary of Pilot Testing Program outcomes

3.1 Validation of the GSSI Requirements and GSSI Indicators

The first objective of the Pilot Testing Program was to validate the *GSSI Requirements* and *GSSI Indicators* for their usefulness and practical application. During the Pilot Test the IEs have conducted more than 1400 evaluations against individual *GSSI Requirements* and *GSSI Indicators* across all participating schemes and all sections of the Tool. The data from the individual evaluations has been used to validate the applicability, auditability and rigour of the *GSSI Requirements* and *GSSI Indicators*.

Applicability

Analysis of the Pilot Test Reports showed that in 80% of all cases the IE could take a decision in relation to alignment with the respective *GSSI Requirement* or *GSSI Indicator* without the need for further clarifications. This shows a high degree of applicability of the Tool, Figure 2 provides an overview of the ease of decision making per section of the Benchmark Framework.

Tab. 1: Applicability of *GSSI Requirements* and *GSSI Indicators* per Section of the Benchmark Framework.

Section	Decision taken	Clarification needed
Section A-Governance	84 %	16 %
Section B-Operational management	81 %	19 %
Section C-Aquaculture	79 %	21 %
Section D-Fisheries	78 %	22 %
Over all	81 %	19 %

Auditability

Auditability was used as a second indicator to validate the *GSSI Requirements* and *GSSI Indicators*. Auditability has been evaluated by looking at the “issues” raised on the *GSSI Requirements* and *Indicators* and/or their guidance by IEs and participating schemes throughout the Pilot Testing Program. Issues included, but are not limited to, unclear wording, difficulty to assess, unclear intention, open to diverse interpretation, multiple criteria, and unclear expected evidence.

The auditability of *GSSI Requirements* and *GSSI Indicators* varied widely between sections and between schemes. Table 2 displays the range of percentages of *GSSI Requirements* and *GSSI Indicators* that were evaluated without issues. The range in percentages reflects the variation between the schemes.

Tab. 2: Issues raised by the IEs across all schemes by sections

Section	Issues Raised
Section A-Governance	30 – 90 %
Section B-Operational management	16 – 21 %
Section C-Aquaculture	40 – 56 %
Section D-Fisheries	30 – 50 %

The high variation in Section A-Governance shows that some schemes were easier to assess against the *GSSI Requirements* and *GSSI Indicators* than others, calling for more general applicability of the Tool.

The relatively low percentages of *GSSI Requirements* and *GSSI Indicators* without issues reflect the high number of recommendations provided through the pilot test. Those comments have helped to improve the language of the *GSSI Requirements* and *GSSI Indicators* for a better auditability. The detailed comments provided to the individual *GSSI Requirements* and *GSSI Indicators* can be found in the separate excel document. These comments have informed the Expert Working Groups in their process of updating and finalizing the GSSI Global Benchmark Tool.

On a generic level, the Expert Working Groups have taken on board the recommendation from the Pilot Testing Program to include “non-applicability” as an acceptable outcome of the Benchmark Process in certain cases. In the updated version of the Benchmark Tool the EWGs will specifically identify where and how this approach could be used. This will further improve the overall auditability of the *GSSI Requirements* and *GSSI Indicators*. To regulate the use of this option the following rules should apply: in Section A&B there shall be no “Non Applicable” on the “*GSSI Requirements*” level. For section C&D the scope of the Scheme is integral part of the Benchmark Result and within the scope it needs to be laid down why certain *GSSI Requirements* are not applicable (e.g. if the scope of regional Fishery Scheme does not cover deep sea or enhanced fishery).

Rigour

As a third indicator to validate the *GSSI Requirements* and *GSSI Indicators* the overall rigour of the set of *GSSI Requirements* and *GSSI Indicators* was evaluated. To do so the total numbers of *GSSI Requirements* and *GSSI Indicators* respectively categorized as “in alignment” or “not in alignment” have been analysed.

Tab. 3: Judgement of the IE across all sections and schemes

Judgement	GSSI Requirement	GSSI Indicator
In Alignment	66 %	34 %
Not in Alignment	32 %	68 %

The analyses showed that across all sections and schemes about 2/3 of the *GSSI Requirements* and 1/3 of the *GSSI Indicators* have been judged as “in alignment”. None of the *GSSI Requirements* was judged as “non-alignment” across all of the participating schemes. This shows the *GSSI Requirements* are achievable in concept. The total number of “alignments” across all *GSSI Requirements* and all schemes provide a good indication of the rigour, confirming the set of *GSSI Requirements* is rigorous, yet achievable.

The much lower rate of GSSI Indicators found to be in alignment compared to the 2/3 of GSSI Requirements shows the potential of the Tool to differentiate and to reflect diversity of approaches.

The detailed recommendations to the language of the *GSSI Requirements* and *Indicators* collected during the pilot testing program will help to fine-tune the Tool, ensuring it will be globally applicable, achievable and credible.

3.2 Validation of the Benchmark Process

The GSSI Benchmark Process includes 7 steps from application to monitoring of compliance of recognized Schemes. The pilot testing program evaluated the first steps and identified a number of improvements based on recommendation of the IE's and the participating schemes also for the following steps, which will be included in the final update of the Tool.

Step 1, Application

In order to improve the understanding of the Benchmark Process in particular with regards to the expectations towards the different steps of the benchmark process and the timelines the supporting guidance document (“Guidance for Application”) will be developed further. In addition to this document the application will be supported with a conference call between the GSSI Secretariat and the scheme owner.

Step 2, Preliminary Desk Top Review

The second step in the process (Preliminary Desk Top Review) was intended to review the completed application and prepare the office visit. The pilot testing process however indicated that this step would better work as a detailed desk-top review with the aim to clarify as many issues as possible prior to the office visit. Accordingly more time shall be dedicated to this step and furthermore it shall not be considered as “preliminary” anymore.

The updated step includes an exchange on the findings between IEs and the scheme owner in order to avoid and clarify potential misunderstandings and allow adding further evidence to the original application if required. The Desk Top Review is finalized by a Report with an executive summary prepared by the IEs. The IEs shall give a recommendation to conduct the office visit or to request the scheme owner to submit a revised application. This recommendation includes a recommendation for a joint office visit of both IE's or an office visit for section A&B only.

The Steering Board Liaison and the Scheme Owner will make a joint decision if and how to continue with the Office Visit based on the IE recommendation. Whether a joint office visit of both IEs is made depends on what will be considered the most efficient approach for further clarification of outstanding issues, this decision is ultimately made by the Steering Board Liaison.

Step 3, Office Visit

The Office Visit (Step 3) was found to be an excellent opportunity for in-depth exchange between IE and scheme owner not only for Sections A&B, but also for Section C and D. Accordingly the updated process includes the opportunity for a joint office visit of both IEs. The Pilot Test also showed that the Office Visits provide an opportunity to agree on “supplementary actions” of the scheme owner to address identified issues within appropriate timeframes.

Steps 4 – 6, Review of the Benchmark Report

GSSI's Benchmarking Process is characterized by transparency and multiple independent checks. This involves convening a Benchmark Committee for each applicant certification scheme to evaluate the IEs' Benchmark Report.

At this meeting the respective IEs present the Benchmark Report to the BC, after which the Scheme Owner will have the opportunity to discuss the Benchmark Report with the BC. The outcome of this BC Meeting is a recommendation for recognition based on consensus between the BC members and will be put out for Public Consultation. If no consensus can be reached the matter is referred to the GSSI Steering Board Liaison for resolution. This is followed by a final recommendation for recognition by the BC to the GSSI Steering Board for decision.

Benchmark Committees (BC) were not convened during the Pilot Tests but committee members have been selected and were approved by the GSSI Steering Board. Training for the Benchmark Committee members will be conducted

after finalizing the Tool in October 2015. The desired composition of the BC has been discussed during the Pilot and it was recommended that the BC should consist of:

1. The GSSI Steering Board Liaison
2. Independent Expert* for Scheme Governance and Operational Management
3. Independent Expert* for Fisheries and/or Aquaculture
4. 2-5 voluntary experts representing the seafood sector with competencies outlined under www.ourgssi.org

*Note: These Independent Experts shall be different from those conducting the Benchmark

Step 7, Monitoring of continued alignment

It was also discussed by the IE's and the Expert Working Groups how GSSI can monitor alignment after initial recognition of a certification scheme. It was concluded that it is not required to conduct an annual reassessment. The exact interval of full reassessment still needs to be determined, recommendations varied between 2 and 4 years. In the intermediate periods schemes should conduct self-assessments and inform the GSSI Secretariat of any changes to their governance, process or standards by sending relevant information to the GSSI Secretariat. Depending on the nature of such change a reassessment might be required.

3.3 Validation of Time and Cost Involved in the Benchmark Process

The Pilot Testing Program showed that the Benchmark Process of one seafood certification scheme requires 10-15 Independent Expert days to which time and cost for travel need to be added. The number of days depends largely on the quality of the application. Well completed applications with accurate referencing and a well prepared dossier for the office visit shortens the required time significantly. It is therefore recommended from this pilot to reflect this variation in the fee structure for the Benchmark Process, rewarding applicant certification schemes for preparing high quality applications through reduced costs.

As an overall timeline for the GSSI Benchmark, from Application to the Steering Board's decision on recognition, a period of 6 month can be considered as reasonable. The Benchmark Process might take longer depending on the number and quality of non-alignments and the corresponding supplementary actions.

The split down of working days required by the scheme owner and the IEs to complete the different steps of the Benchmark Process, as well as the expected timeframe for completion is provided below:

Tab.1: Estimated demand of working days and overall timeline of the GSSI Benchmark Process:

Step	Scheme Owner	IE Governance and Process	IE Aquaculture/ Fisheries	Timeline
1. Application	3-5 days	-	-	week 1 to 4
2. Desk-Top Review	-	3-4 days	3-4 days	week 4 to 8
3. Office Visit	2-3 days	2-3 days	0-2 days	week 8 to 12
4. BC Meeting	0,5 days	0,5 days	0,5 days	week 12 to 16
5. Public Consultation	0,5 days	0,5 days	0,5 days	week 16 to 20
6. Decision by the SB	-	-	-	week 20-24
7. Monitoring	-	-	-	continuously
Total	6 - 9 days	6 - 8 days	3-7 days	6 month

*all figures are tentative and exclude travel time

3.4 Training of the Independent Experts and Benchmark Committee Members

By conducting an in-person training and facilitating exchange between the Independent Experts the understanding of the Tool and on how to conduct the benchmark was harmonized throughout the Pilot Testing. Today a pool of 10 Independent Experts for Governance/Operational Management, Fisheries and Aquaculture are ready for the launch of the Benchmark Tool and the first GSSI Benchmark.

A call for Benchmark Committee members was launched during the Seafood Show in Brussels and highly competent individuals across different stakeholder groups have been approved by the Steering Board. Training for the Benchmark Committee members will be conducted after the Tool has been updated based on the input from the Public Consultation and Feedback from the Pilot Testing (expected for October 2015).

3.5. Other Issues Raised as Part of the Pilot Testing Program

In addition to collecting feedback on the 4 objectives of the Pilot Testing Program a number of additional issues were raised in relation to the GSSI Global Benchmark Tool. Often these issues were of a more generic nature. The summary below provides an overview of the key issues that were discussed and how the feedback from the Pilot Testing Program has been addressed by the Expert Working Groups and GSSI Steering Board respectively.

Verification of Standard Implementation “on the ground”

The question how far the Benchmark Process can go to look into evidence of implementation of certification standards on the ground was intensively discussed between the IEs, scheme owners, and the EWGs.

It was concluded that verification of standard implementation requires a site visit. The scope of the GSSI Global Benchmark Tool does not include site visits, as this would duplicate the work of Certification and Accreditation bodies.

GSSI considers the implementation of standards on the ground as an important issue to ensure confidence in seafood certification. The GSSI Global Benchmark Tool will verify that scheme owners have put in place robust assurance systems, including accreditation and certification, to assess implementation of their standards in the field. Upon the question of how the GSSI Benchmark Tool addresses this issue the Process EWG stated:

The Process EWG determined that the best approach to determining whether a good audit process is likely is to have a set of core criteria focusing on consistent approaches by qualified individuals, and good checks and balances. So while the requirements are not prescriptive in terms of what an auditor or audit team is required to do on site (given the variability in audit methodologies between schemes) there should be some level of assurance that the audit will be carried out consistently. Additionally they discussed how there is a corollary between the quality and clarity of the scheme documentation as reviewed by the Independent Expert and the rigour and quality of the scheme – this is as good a proxy indicator as any of the potential rigour of the certification process.

The P-EWG provided an overview of the *GSSI Requirements* and *GSSI Indicators* in Sections A and B which are relevant to ensuring a robust and consistent certification system, outlined in the appendix to this document.

Benchmarking against Sections A and B verifies a certification scheme’s systems and procedures provide for a rigorous independent third party certification and audit process, while the benchmark against Section C (and D) ensures a scheme is addressing all the elements outlined by the GSSI Requirements and GSSI Indicators through its standard and guidance documents.

Objective Evidence

In the above mentioned context it was also discussed what documents should be considered as required evidence for IE's, in particular audit reports. It was concluded, that it is the scheme owners responsibility to provide evidence for alignment with the *GSSI Requirements* and *GSSI Indicators*. It was agreed that GSSI will consider all evidence provided, and that in first instance it is up to the scheme owner to decide what evidence serves this purpose best. The guidance found in the *GSSI Benchmark Framework* gives detailed suggestions on what kind of evidence is expected.

With regard to audit reports it became apparent that there is a systemic difference between certification reports for fisheries and aquaculture. While a fishery certification report usually is very comprehensive, most of the aquaculture reports reviewed were much leaner, reflecting the different size, complexity, and nature between fishery and aquaculture operations.

In the GSSI Benchmark Process the audit report is part of a set of evidence like scheme rules and procedures. These include but are not limited to training of auditors, internal quality assurance systems, certification methodologies and so forth. As such it might be found that a lean report can be a highly efficient and appropriate approach, if the supporting system provides corresponding assurance.

With regard to the implementation of standards on the ground and the corresponding evidence it was concluded that the current set of Requirements in Sections A and B cover the necessary components to assess the quality of a schemes' accreditation and certification systems. The Benchmark Tool is asking a scheme to specify auditor competencies and training as well as consistency and completeness of audit reports. It is suggested to make a sample of audit reports a mandatory piece of evidence for the Benchmark Process. If confidentiality issues are related to the review of audit reports it is proposed to conduct the review during the office visit.

There are 2 issues to be taken up by GSSI to further improve the process:

1. Collaboration between the IEs assessing A&B and Section C or D needs to be strengthened to ensure appropriate judgement on the overall quality of a scheme. As an example for a point of exchange between the IE the review of auditor competence requirements was mentioned.
2. Robust assurance systems, including accreditation and certification, which ensure standard implementation 'on the ground' are critical to maintain confidence in certified seafood. This was identified as an area on which GSSI and the schemes should work together for future development.

GSSI Requirements for accreditation

Though the intent and foundation for the *GSSI Requirements* on accreditation (ISO-17011 resp.) were well understood, the actual language and application of the *GSSI Requirements* did lead to some confusion in the Pilot Testing program. In particular issues were raised whether the *GSSI Requirements* would unintentionally exclude the use of national accreditation bodies as an appropriate accreditation system for GSSI Recognition.

This feedback was discussed within the GSSI Expert Working Group with the conclusion that the use of national accreditation bodies which are a member of the International Accreditation Forum (IAF) and signed the Multi-Lateral Agreement (MLA) on ISO-17065 should be considered in alignment with the *GSSI Requirements* on accreditation. The IAF membership and signing of the MLA will serve as an assurance of implementation of ISO-17011 and an appropriate review system. This is in line with the criteria in the FAO Evaluation Framework for assessing conformance with the Technical Guidelines on Aquaculture Certification.

The above description will be included in the guidance of the relevant *GSSI Requirements*. In line with the FAO principles of non-discrimination the *GSSI Requirements* for accreditation remain generic and do not prescribe one specific system of accreditation to be used.

How will GSSI deal with different “scoring methodologies”?

GSSI will need to deal with different systems and scoring methodologies that schemes apply to assess conformity to their standards. The Pilot Testing Program showed a significant diversity of approaches in this regard.

This issue will be discussed by the Steering Board on 15 September 2015. A proposal will be drafted and discussed with the Independent Experts that conducted the Pilot Test before it is submitted to the Board.

How will GSSI present and communicate the Benchmark Results?

Based on the feedback from the Pilot Testing Program and Public Consultation, a sub-group with representatives of all EWGs, and a cross section of GSSI stakeholders, discussed how the benchmark results of a recognized scheme should be communicated. Such communication needs to take into account that all information on *GSSI Requirements* and *GSSI Indicators* needs to be transparent and easily accessible without creating the perception that GSSI is ranking certification schemes.

The group agreed unanimously that the current design of the Global Benchmark Tool would provide an excellent format to communicate the benchmark results with the following adaptations:

- An executive summary describing the scope and characteristics of the benchmarked scheme should be included;
- The “Guidance for Auditors” information should be replaced with the conclusion of the Independent Expert to recognize a scheme as “in alignment” with a specific Requirement or Indicator
- Only the GSSI Indicators that a scheme has implemented should be included in the overview graphics of the different sections providing a unique graphical “fingerprint” for each GSSI recognized scheme. Allowing comparability between schemes without ranking (see page 18, 54, 79 and 145 of the benchmark tool for examples of the overview graphics <http://www.ourgssi.org/assets/GSSI-Benchmarking-Tool/GlobalBenchmarkTool-18Apr15-2.pdf>).

This recommendation was endorsed by the Steering Board on July 16, a mock-up of the design of the Benchmark Report will be available online at the launch of the Tool.

What will be the timeline and process for Review and Update of the Global Benchmark Tool?

The GSSI Charter currently states the Tool will be reviewed and updated every 3 years. A small subset of the EWGs discussed some suggestions for a process to update the Tool which will be discussed at the next GSSI Steering Board meeting in September 2015.

Communication challenges around “GSSI Indicators”

The feedback from the Pilot Testing did identify some issues around the communication of the *GSSI Indicators*. A number of recommendations have been made and accepted in order to address the existing communication challenge and confusion. The following key issues identified during the pilot have been discussed:

- The concept of *GSSI Indicators* and what they should achieve is not very well understood outside of GSSI without additional explanation. A more descriptive definition and clear purpose statement are required.

- Clear communication on what it actually means to be in alignment *with GSSI Indicators* is necessary. GSSI will need to develop clear communication guidelines on how the Indicators are intended to be used.
- The name “Indicator” is misleading as it already has a very specific meaning in the context of some schemes.

Based on the feedback received from the Pilot Testing Program the EWGs made the following recommendations, which have subsequently been accepted by the GSSI Steering Board:

1. Include better description

A short description should be included in the Benchmark Tool to provide further context for the *GSSI Indicators*. The description of the context should include, at a minimum, a clear statement that the current set of *GSSI Indicators* is not exhaustive, a work in progress and that *GSSI Indicators* can serve different purposes and rationale for the selected reference documents in each section.

2. Changing the name

Rename *GSSI Requirements* and *GSSI Indicators* to “*GSSI Essential Components*” and “*GSSI Supplementary Components*”. This proposal was considered a significant improvement by the majority of the EWG members (12 out of 17 still present) as it better reflects what the *GSSI Indicators* are.

4. Conclusions

The Pilot Testing Program has been a positive and highly constructive cooperation between the participating schemes and GSSI. Piloting did, in particular, tease out key practical issues that demonstrated need for pragmatic modifications. The ability for direct interaction between IEs and the EWGs during the final EWG meetings held at the FAO in Rome (7-10 July, 2015) benefitted the update process greatly. The knowledge gained from the Pilot Testing Program is a sound basis for the final update of the GSSI Global Benchmark Tool, the corresponding Benchmark Process and the preparation of further GSSI Guidance documents.

Appendix: GSSI Process clauses relevant to ensuring robust and consistent certification assessment

GSSI Process clauses relevant to ensuring robust and consistent certification assessment (Numbering to be checked if correct after final revision):

Accreditation

B.1.05 The scheme owner only works with accreditation bodies that have personnel with the necessary education, training, technical knowledge and experience for performing accreditation functions in fisheries and aquaculture operations.

B.1.05.1 The scheme owner only works with accreditation bodies that have personnel with training on the content of the standard and its intent.

B.1.08 The scheme owner ensures that the accreditation process includes an on-site audit of the certification body.

B.1.09 The scheme owner ensures that the accreditation process includes a review of the performance of certification bodies and auditors in the field.

Certification methodology

B.2.05 The scheme owner ensures that CBs apply a consistent methodology to assess compliance with the standard

B.2.05.01 The scheme owner has a publicly available methodology for calculating minimum audit duration

B.2.05.02 The scheme owner has defined requirements for sampling methodology and frequency that CBs are required to follow during the audit

B.2.08 The scheme owner requires CBs to use consistent formats for audit reports and their content / how the reports are filled in

B.2.09 The scheme owner requires that CBs have in place consistent procedures for stakeholders to provide input during the certification process.

B.2.11 The scheme owner requires that the scope of the (re-) certification audit includes a visit to locations pertinent to the scope of the certification.

B.2.15 The scheme owner clearly defines the criteria relating to the classification of non-conformities. Where the scheme owner allows for certification of an entity with non-compliances, the scheme owner requires that:

- only non-conformities on minor, non-critical issues are allowed;
- a timeline for closing out corrective actions must be defined;
- a system to verify that corrective actions have been closed out is in place

Personnel Competence

B.2.16 The scheme owner has defined the qualifications and competence criteria required by auditors and audit teams employed by Certification Bodies, and makes this information publicly available.

B.2.17 The scheme owner requires CB auditors to have successfully completed training in the scheme to the satisfaction of the scheme owner.

B.2.18 The scheme owner requires that CB auditors successfully complete auditor training based on ISO 19011. This does not include technical experts seconded to audit teams.

B.2.19 The scheme owner requires that Certification Bodies include the following in their competence assessment of auditors:

- an assessment of knowledge and skills for each fundamental area the auditor will be expected to be working,
- an assessment of knowledge of pertinent fishery and / or aquaculture Programs and the ability to access and be able to apply relevant laws and regulations,
- an assessment of the personal attributes of the auditor, to ensure they conduct themselves in a professional manner,
- a period of supervision to cover the assessment fishery and / or aquaculture principles, specific audit techniques and specific category knowledge,
- a documented sign off by the CB of the satisfactory completion of assessment requirements.

B.2.20 The scheme owner requires that CB lead auditors maintain category and scheme knowledge.

B.2.21 The scheme owner has or requires that CBs have a continuing professional development program in place that provides auditors with current best practice for fishery and / or aquaculture.