

Proactive Environmental Management of Commercial Fisheries: Closing gaps in Supply Chain Management



Professor Paul McShane



SEAFOOD SERVICES
AUSTRALIA

Australian
Southern
Rocklobster



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commercial fisheries: closing gaps in
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TABLE OF CONTENTS

NON-TECHNICAL SUMMARY	4
Outcomes Achieved to Date	4
ACKNOWLEDGMENTS	6
BACKGROUND	7
NEED	7
OBJECTIVES	7
METHODS	7
RESULTS/DISCUSSION.....	9
Food safety in the supply chain.....	9
Gap analysis leading to adoption of food safety elements in the Clean Green strategy	9
The Clean Green strategy.....	10
Recommendation on Good Practice.....	11
The Clean Green standards relationship with other Standards.....	11
Certification Bodies	11
Details of the food safety standards applicable to the supply chain	12
Alignment to an Environmental Management System	18
Plan	18
Do.....	18
Check	19
Act.....	20
BENEFITS AND ADOPTION.....	20
FURTHER DEVELOPMENT.....	21
PLANNED OUTCOMES	21
CONCLUSIONS.....	21
REFERENCE.....	21
INTELLECTUAL PROPERTY	21
APPENDIX “CLEAN GREEN AUDIT PROTOTOLS”	22

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OBJECTIVES:


1. To identify and fill gaps in food safety protocols applicable to the supply chain management system developed for South Australian rock lobster
2. To develop a template of supply chain management protocols applicable to food safety in other sectors of the Australian Seafood Industry.

NON TECHNICAL SUMMARY:

OUTCOMES ACHIEVED TO DATE

A recognition of existing best practice applicable to food safety protocols in the South Australian rock lobster industry has been achieved by engaging “grass roots” practitioners in developing practical standards (Clean Green standards). The Clean Green standards reflect gaps between Australian (and International) seafood safety standards and previously existing work practices aboard fishing vessels and in processing facilities (identified from vessel and site visits, and extensive consultation with operators). The Clean Green standards so developed describe procedures that exceed compliance to existing food safety legislation and to the recently introduced Seafood Standards (Australian Seafood Standard Version 9 2003). The standards have been presented in plain language and in concise graphically informative ‘flip cards’ to be accessible to industry participants. They align to audit protocols amenable to independent certification under the guidance of the Joint Accreditation System Australia and New Zealand (JAS-ANZ). This links to a broader integrated environment and product management strategy applicable to the rocklobster supply chain (the Clean Green Strategy). Training resources to develop awareness, understanding, and compliance to the food safety standards have been developed and applied in the real world environment (fishing boats, processing sheds). More than 200 fishermen have now been trained in the food safety standards embedded in the Clean Green Strategy. The Clean Green Strategy has now been extended to other sectors including the Tasmanian and Victorian rock lobster industries to create the brand ‘Australian Southern Rock Lobster’.

New food safety standards applicable to the Seafood Industry align to new food safety legislation. However, ensuring compliance to new standards can be problematic because the standards are impenetrable to most grass roots participants in the Seafood Industry. A gap analysis comparing work practices aboard fishing vessels and in processing sheds was used to develop practical standards aligned to the new food safety standards. In a world of increasing rules and regulations industry participants need to engage proactively in ensuring that Australian seafood product continues to be valued on domestic and export markets. This project is part of a larger integrated



environment and product management strategy (the Clean Green strategy). The strategy realises a vision for excellence in environmental management, fisheries sustainability, product quality, workplace safety, animal welfare and, through this project, food safety.

The project presents best practice in the South Australian rocklobster industry applicable to food safety. Standards relating to on board product handling and processing of rock lobsters have been developed and described in plain language practical terms. These standards have been presented in an accreditation system under the guidance of JAS-ANZ to provide for audit of food safety protocols. The accreditation system is similar to other Environmental Management Systems developed for Australian Seafood Sectors in that it provides for continual improvement. However, this project supports the world's first fully integrated supply chain management system applicable to a commercial fishery.

Importantly, this project reflects pride in performance of the participants in the rocklobster industry: a proactive response to environmental management of commercial fisheries. It has now been extended to the other Southern rock lobster producing states of Tasmania and Victoria to create the premium brand Australian Southern Rocklobster.

KEYWORDS: Australian Southern Rocklobster, food safety, standards, supply chain management, audit protocols.

ACKNOWLEDGMENTS

This project forms part of a much larger program “the Clean Green Australian Southern Rocklobster Integrated “Pot to Plate” Environment and Product Management System”. The “Clean Green” project has been supported financially by the South Australian Rocklobster industry and more recently by the Department of Agriculture Fisheries and Forestry.

The rocklobster fishermen who possessed the foresight and drove development of the “Clean Green” concept from the mid-late 1990s: Steve Hinge, Daryl Spencer, Terry Moran, Lionel Carrison, Kym Redman, Brian Lawry, Roger Cutting, Andrew Ferguson and Mark Denton.

The fishermen and processors in Robe and Port MacDonnell including Sky Seafood and Stanke Oceania participated in the trial audits and assisted with recognition and development of food safety standards.

A special thanks to Roger Edwards who believed in the vision, drove the Industry to adopt the concept and convinced the rocklobster fishermen to support the project. Roger also managed the South Australian industry engagement including feedback on draft standards and training resources.

Matt Muggleton of Seafood Council SA did most of the practical liaison with the fishermen and processors leading to the description and presentation of food safety standards and development of audit protocols.

Tony Craven of JAS-ANZ enthusiastically embraced the supply chain management concept. Kylie Sheehan of JAS-ANZ provided constructive feedback on draft standards and assisted in developing the audit protocols applicable to food safety standards.

David Milne (AMC) provided technical input in drafting seafood safety standards aligned to rocklobster industry needs and undertook practical assessment aboard rocklobster vessels and in processing sheds.

Jayne Gallagher and Alan Snow of Seafood Services Australia provided constructive comments on previous versions of the seafood safety protocols and on initial drafts of the final report.

This project was funded by the Seafood Industry Development Fund administered by Seafood Services Australia on behalf of the Fisheries Research and Development Corporation.



BACKGROUND

For the past five years, the South Australian rocklobster industry has been developing a vision for proactive environmental management. To date, it has contributed more than \$150000 in cash and considerably more in kind to develop an auditable framework applicable to the entire supply chain “from pot to plate”. Working with JAS-ANZ the industry has developed a fully integrated environment and product management strategy ‘the Clean Green strategy’. Gaps in present work practices applicable to new food safety standards existed and are addressed in this project by developing standards applicable to desired work practices.

Work practices embrace the catching and processing sectors. Accordingly, the present study provides for a robust accreditation of food safety standards aboard fishing vessels and in processing facilities against an internationally recognised framework of audit and certification. The study also addresses supply chain issues such as the transfer of seafood product from vessel to shore to processor.

The Industry consultation undertaken so far has demonstrated enthusiastic grass roots support for the strategy particularly as it is industry driven and focused. A measure of this support is the direct financial support of the Clean Green strategy by the rocklobster industry. This project supports the world’s first supply chain management system applicable to a commercial fishery paving the way for other Australian fisheries to become similarly responsive to premium international market demands.

NEED


There is a need for the Australian seafood industry to capture benefits from internationally recognised standards relating to environmental management and food safety among other product attributes. This is consistent with the challenge of optimising market development, maximising seafood value and securing equitable financial returns. Allied to this is the need for greater consumer awareness of seafood quality reflecting seafood safety and environmental stewardship. With a demonstrable commitment to these goals from the catching sector, the rocklobster industry presents a role model for supply chain management to other food sectors.

OBJECTIVES

1. To identify and fill gaps in food safety protocols applicable to the supply chain management system developed for South Australian rocklobster
2. To develop a template of supply chain management protocols applicable to food safety in other sectors of the Australian Seafood Industry.

METHODS

A draft suite of standards developed in the preliminary stages of the “Clean Green” program was used as a basis for comparison with the new Australian Seafood Standards Version 9 2003. These standards reflected the then existing best practice in application to catching and processing rocklobsters. Observation of best practice (aboard vessels and in processing facilities), knowledge of existing or proposed regulations or legislation applicable to food safety were the principal inputs to the development of standards. The draft standards were then submitted to JAS-ANZ to align to audit protocols in JAS-ANZ’s capacity as an accreditation agency. The audit protocol was developed as part of a parallel project developing a supply chain management strategy applicable to rocklobster. The final audit protocol is appended.



A draft audit protocol prepared by JAS-ANZ was modified following a gap analysis of the current and proposed standards. The gap analysis focused on:

- current Food Safety Australia and New Zealand (FSANZ) standards;
- current Australian Quarantine and Inspection Service (AQIS) standards applicable to seafood exports;
- the redrafted Australian Seafood Standards prepared by Seafood Services Australia;
- International food safety programs particularly Codex.

The draft standards prepared following the gap analysis reflect existing best food safety practice in the industry (as described above) in a risk-based Hazard Analysis and Critical Control Point (HACCP) framework. Existing best practice was described in terms amenable to audit (following input from JAS-ANZ) and in terms accessible to industry practitioners (primarily fishermen and processors). Where existing best practice was demonstrably not compliant with the formal standards noted above, desired practices were presented as standards within the Clean Green strategy. All standards developed for food safety applications in catching and processing rocklobsters are hereafter referred to as Clean Green standards.

Descriptions of standards were presented to industry participants in graphically informative “flip cards” similar to the format of airline safety briefing cards. The “flip cards” were modified (content and graphical presentation) following industry comment. This feedback was considered important in the context of encouraging industry proactivity in responding favourably to the Clean Green standards by modifying (where necessary) their work practices. The Clean Green standards were then checked for practical application by direct observation of participants in rocklobster fishing (product handling) and processing (product storage and handling).

After checking for practical application, industry relevance, and alignment to the Australian Seafood Safety Standards, a final suite of Clean Green standards was developed. Finally, the Clean Green standards applicable to South Australian rocklobster were modified in a template applicable to the wider rock lobster industry (Tasmania and Victoria) providing for a new brand: Australian Southern Rocklobster™.

RESULTS/DISCUSSION

Food safety in the supply chain context

Historically the seafood industry has been segmented and action within segments has been at the individual or business level. In particular, given the export focus of live rocklobster, reliance has been placed in meeting Australian Quarantine and Inspection Service (AQIS) requirements. However meeting AQIS requirements solely will not ensure compliance with the range of legal, market and community imperatives of the industry. Indeed, in recent times Governments have moved to implement assessment, inspection and audit procedures in Food Safety e.g. Victoria's Primesafe and European Union export requirements.

In some cases responsibility for food safety in the seafood industry is now spreading to all participants in the supply chain. It is likely that formal arrangements for food safety will apply, for example between licence holders and processors.

The development of integrated supply chain product standards and management systems, accompanied by third party independent certification, has emerged as a compelling and logical industry response, to cost effectively and explicitly deliver on the industry's responsibilities. The following addresses the first objective of this project i.e. to identify and fill gaps in food safety protocols applicable to the supply chain management system developed for South Australian rocklobster.

Gap analysis leading to adoption of food safety elements in the Clean Green strategy

The gap analysis of current national and international food safety standards and current workplace practices in the South Australian rocklobster industry revealed the need for the following:

- a food safety induction program for the catching and processing sectors;
- a vessel cleaning program;
- guidelines for conduct of operation of rocklobster vessels.

This reflects the identified lack of awareness of basic food safety issues among Industry participants particularly in the catching sector.

Changes to existing work practices aimed at filling identified gaps have been addressed by:

- preparation of a food safety induction program with associated training materials and on-board graphically informative instructions for the information (and training) of new crew members;
- A vessel-cleaning program aimed at informing new crewmembers aboard rocklobster vessels such that they are compliant to new seafood safety regulations and procedures;
- Preparation of auditable standards applicable to day-to-day work practices aboard rocklobster vessels.

The above elements have been incorporated into the Clean Green strategy and aligned to the audit protocol (appended).

The Clean Green strategy

The “Clean Green” strategy provides:

- Pot to plate standards - environment and product standards developed with guidance by the JAS-ANZ. JAS-ANZ is an internationally recognised accreditation agency facilitating the alignment of standards to audit protocols and certification;
- Training materials aligned to the National Seafood Industry Training package;
- Industry training to meet the standards;
- Best practice manual;
- Audit protocol;
- Independent third party certification of the rocklobster supply chain from “pot” to “plate” and
- Branding materials for those achieving certification.

The current project addressed standards and work practices applicable to food safety within the supply chain (principally catching and processing). The Clean Green strategy is complemented with a training program including a focus on food safety issues. The program has been developed specifically to provide a career path and to assist participants in the supply chain to fulfil their legal obligations to food safety, through a consistent, informed and resourced basis for the certification of compliance with the standard.

Where possible, the standard captures best practice principles and, as a minimum, legal requirements in food safety. It is important to note that the existence of the standard is in no way intended to replace or avoid the obligations specified by any legislation. However, working to the standard presents an opportunity to ensure legislative requirements are met in practice – a requirement often not met by industry Codes of Practice.

The Clean Green strategy will be reviewed and updated on a regular basis with reference to appropriate legislative and other requirements.

The Clean Green standards applicable to food safety require individuals to demonstrate:

- the application of Good Manufacturing Practice (GMP) on catching vessel;
- a food safety induction program applicable to the catching and processing sectors;
- a vessel cleaning program;
- the sustainable and ethical catching and handling of product;
- the adoption and implementation of HACCP;
- a documented and effective quality management system;
- control of factory environment standards, products, processes and personnel;
- a throughout the supply chain approach to management;
- the adoption and implementation of workplace health and safety requirements.

Food safety protocols relate to the supply chain as shown below. Pot level relates to the catching of rocklobsters i.e. locating fishing grounds and setting pots to catch

rocklobsters. Deck level relates to on-board product handling systems and vessel cleaning programs. Deck–factory level relates to product handling systems in transferring product from vessel to factory (processor).

Supply Chain	Obligations
Pot	Sustainability
	Bycatch
	Environmental Interactions
	Animal welfare
Deck	Food Safety
	Food Quality
	Environmental Interactions
	Workplace Health and Safety
	Animal welfare
Deck – Factory	Food Safety
	Food Quality
	Animal welfare

Factory/retail level requires certification in the following areas:

Supply Chain	Obligations
Factory	Food Safety
	Food Quality
	Animal welfare
Factory – Retail	Food Safety
	Food Quality
	Animal welfare

Recommendations on Good Practice

These criteria are recommended to all participants as being industry best practice, to which they should aspire. Where any of these recommendations are not met, it is still a requirement of the Clean Green strategy that these areas of non-conformance are recorded within the auditor’s evaluation report.

The Clean Green Standard’s Relationship with Other Standards

The Clean Green strategy requires compliance with existing standards including Codex Alimentarius CAC/RCP 24-1979, Chapter 3 of the Australia New Zealand Food Standards Code and AQIS Export Control (Processed Food) Orders (2001).

Certification Bodies

For the evaluation process to have credibility, bodies that are both independent and competent shall undertake evaluations for certification. It will be a requirement that evaluation against the Clean Green standard shall be carried out by bodies formally accredited to the Australian standard AS/NZS 3843 (general requirements for bodies operating product certification systems). To comply with AS/NZS, Certification Bodies must be independent of the organizations and activities that they are evaluating, whilst evaluators must have technical competence, including appropriate qualification, training and experience, for specific product categories. In addition,

evaluations must be effectively supervised by competent staff following documented policies and procedures, and client confidentiality must be ensured.

Details of the food safety standards applicable to the supply chain

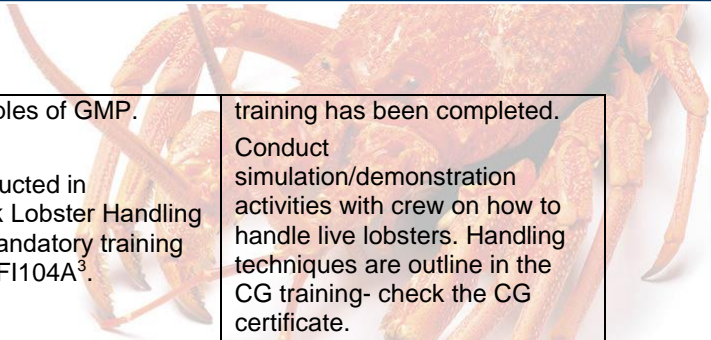
Set out below is a template of standards and audit guidelines applicable to food safety issues in the supply chain as part of the Clean Green strategy. This relates to the second objective of this project i.e. to develop a template of supply chain management protocols applicable to food safety in other sectors of the Australian seafood industry.

Standards developed in the current project have been extended to apply to Australian southern rocklobster more generally (i.e. supporting the industries of South Australia, Victoria and Tasmania). Thus, specific reference to state-based legislation has been amended to provide for more generic coverage across all southern rocklobster-producing states. As food safety requirements relate to national (FSANZ, AQIS) and international (Codex) protocols, development of template of food safety protocols beyond the South Australian industry was straightforward. The standards presented below provide a basis for the commercial application of work practices aligned to best practice food safety standards. The alignment of standards to training programs under the auspices of the National Seafood Industry Training Package is also noted in the template presented below. Reference to specific modules of the Package is provided.

OUTCOME	STANDARD	AUDITING GUIDELINES
<p>Maximise Product Quality</p>	<p>The vessel operator shall employ Good Management Practice (GMP)¹ when handling product on the vessel and comply with the Draft Primary Production and Processing Standard for Seafood, Division 2 General Seafood Safety Requirements Clause 6 Seafood Storage Practices shall include:</p> <ul style="list-style-type: none"> a. activities that don't induce chronic stress eg, prolonged holding on board the boat; b. limiting time on deck to less than 10 minutes; c. limiting trip by vessel carrying capacity (CC); d. CC & water flow factors modified in summer with temperature fluctuations; e. holding lobsters in a low light environment; f. no possible contamination with harmful substances; g. correct handling practices to maximise quality; and h. the vessel operator shall 	<p>Audit the vessel holding facilities against the requirements of the Draft Primary Production and Processing Standard for Seafood, Division 2 General Seafood Safety Requirements Clause 6 Seafood Storage. Unless there has been substantial change, the initial audit will include a check list for this standard, but future audits will not include this check.</p> <p>a-g: The auditor shall review the fish buyers receipt documents (Rocklobster Receipt Record SOP 2, the vessel food safety plan) to confirm conformance (target greater than 95% survival).</p> <p>h. Auditor to check the vessel whilst fishing (audits will occur at the start of the season)</p> <p>Review training records and signed crew induction record to establish mandatory induction</p>

¹ Good Management Practice (GMP) give guidance on how food safety and suitability management practices and procedures may be implemented by a Clean Green Category to achieve compliance with the Standard. GMP may be define good management practices relating to:

- (a) particular food safety and suitability outcomes required under the standard
- (b) the harvesting or handling of *Jasus Edwardsii*
- (c) other activities relevant to seafood safety or suitability.



	<p>comply with the principles of GMP.</p> <p>Training shall be conducted in accordance with 'Rock Lobster Handling Guide' contained in mandatory training Units SFI101A² and SFI104A³.</p>	<p>training has been completed.</p> <p>Conduct simulation/demonstration activities with crew on how to handle live lobsters. Handling techniques are outline in the CG training- check the CG certificate.</p>
Water Quality (vessel holding tanks)	<p>The vessel operator shall ensure that the water in holding tanks meets the following specifications:</p> <ol style="list-style-type: none"> correct water flow rate per given RL density; greater than 70% oxygen in holding tank; and temperature is maintained by drawing water from an adequate source. 	<p>a., b. & c.</p> <p>(a-b) Check pump flow rate against tank capacity eg. a 1 inch pump will supply adequate water flow for a 2m³ tank at full capacity. SRL will provide a table as a guide.</p> <p>(c) The auditor to ask where a vessel would draw water from. Eg, 5 NM to sea is good; in Robe harbour is not suitable. Check with the register fish buyer who purchases the product from the licence holder and ask if the licence holder supplies lobsters in good health.</p> <p>Observe operating system and review pump and venturi specifications regarding tank water flows.</p> <p>The auditor shall review the fish buyer's receival documents (Rocklobster Receival Record SOP 2 Target survival greater than 95%) to confirm conformance.</p>
On-board maintenance & cleaning schedule	<ol style="list-style-type: none"> The vessel operator shall document a vessel cleaning and maintenance plan⁴. The vessel operator shall ensure that the plan is implemented and is effective. 	<p>1 & .2</p> <p>Check the preseason checklist. Eg. activities undertaken to prepare the vessel for the season- cleaning, painting, repairing etc</p> <p>Check the vessels compliance by sighting cleaning plan, sighting cleaning chemicals, questioning crew regarding cleaning methods and frequency, undertake a vessel hygiene check (The check list will be provided to the auditor by SRL).</p> <p>Check cleaning and maintenance plan is available.</p>
Landed product	Landed animals shall be alive.	<p>The auditor should review the fish buyers mortality records (Rocklobster Receival Record SOP 2) to confirm conformance. This shouldn't be</p>

² SFI101A- Apply basic food handling and safety practices

³ SFI104A- Meet workplace health and safety requirements

⁴ Cleaning and maintenance plan can be verified by complying with the vessel hygiene certificate

		a problem, but a lobster may die in transit.
Transferring live lobster product	<p>1 Live transport vehicles shall comply with the Draft Primary Production and Processing Standard for Seafood , Division 2 General Seafood Safety Requirements Clause 7 Seafood Transportation and Export Control (Processed Food) Orders Schedule 12, Part 7, 21.1 Live Fish Transport.</p> <p>2 Live lobster shall be transported in closed, dust proof trucks. Transport conditions shall meet the following specifications:</p> <ol style="list-style-type: none"> lobsters shall be packed comfortably in suitable bins; the storage temperature during transporting shall remain between 7°C and 12°C where transport exceed 1 hour from the vessel holding tank; transportation time shall not exceed 12 hours; and a moist environment must be maintained. <p>3 The refrigerated transportation vehicle must maintain a temperature record.</p>	<p>Inspect vehicle for: thermometer/temperature recording devices, records of transport time or pick up locations and cooling system.</p> <p>Check that the transport vehicle is Compliant with Standard 3.2.3 Division 5 Section/Clause 17 or Export Control (Processed Food) Orders Schedule 12, Part 7 Requirements for vehicles, 21.1 Live fish transport</p> <p>a) Check packing eg, a 72L bin will have between 27-34 kg and bin. The auditor will understand suitable packing techniques.</p> <p>18.3 The auditor to check the refrigerated transportation temperature records.</p>
Reception & grading	<p>1 All animals shall be tested on receipt to ensure that they are alive, where animals are not alive they will be discarded. Records of mortalities shall be kept.</p> <p>2 The factory shall have a procedure for the inspection of animals on receipt. The procedure shall include corrective actions required where specifications are not met. The receipt documents shall be kept.</p>	<p>1 Check lobster grading sheets.</p> <p>2 View the fish processor Rocklobster Receipt Record SOP 2 to verify product quality provided by the fisher. (greater than 95% survival target)</p>
Water quality standards (Factory)	<p>1 Where product is held at the factory the water in holding tanks shall meet the following specifications:</p> <ol style="list-style-type: none"> oxygen concentration greater than 70%; ammonia concentration less than 0.5 mg/L; nitrite concentration less than 1 mg/L; nitrate concentration between 100 and 140 mg/L; alkalinity concentration between 100mg/L and 200 mg/l; pH between 7.8 and 8.4; and salinity between 30 and 38 ppt. <p>2 Where these specifications have not</p>	<p>1 The auditor to observe water testing to check water quality parameters conform to the standard.</p> <p>2 Records shall be kept to provide evidence of ongoing compliance and remedial actions. a, b, c, f & g to be tested daily and d & e to be tested fortnightly.</p>

	<p>been met there shall be documented procedures for remedial action or re-direction of product to another holding tank.</p>	
<p>Processing</p>	<ol style="list-style-type: none"> 1 All Factory operators shall have a licence to process fish in accordance with the State Fisheries Act and Regulations. 2 The factory shall use safe handling practices, in accordance with Food Safety Standard 3.2.2, under chapter 3 of the Australian New Zealand Food Standards Code 3 The factory shall undertake all processing in certified premises, in accordance with; <ol style="list-style-type: none"> a. Export Control (Processed Food) orders 1985 and Prescribe foods (general) orders, under the Export control Act 1982; and/or b. Draft Primary Production and Processing Standard for Seafood 4 Where a standard(s) is not conformed to an exemption may be given when there is adequate scientific evidence that proves that the quality and safety of the product is equivalent or above the applicable standard. 	<ol style="list-style-type: none"> 1 Check if the Factory Food Safety plan complies with the following; Export Control (Processed Food) Orders 1985; and/or Draft Primary Production and Processing Standard for Seafood This can be done by checking if the factory has AQIS certification or State Health certification in accordance with the scope of the processes carried out. However if this evidence is not available the auditor will need to assess against these requirements. This sort of evidence may be used for all of these requirements. A checklist will be made available if this case arises.
<p>Product Identification, traceability and recall</p>	<ol style="list-style-type: none"> 1 Packaged seafood shall be labelled in accordance with the requirements of Standard 3.2.3 of the Food Standards Code and include: <ol style="list-style-type: none"> a. the name of the food, its lot identification and supplier details in accordance with Standard 1.2.2 of the Food Standards Code; b. statement of ingredients in accordance with 1.2.4 of the Food Standards Code; c. use by date in accordance with 1.2.5 of the Food Standards Code; directions for use and storage in accordance with 1.2.6 of the Food Standards Code; 2 Seafood must also comply with other applicable labelling laws. 3 Packaged seafood must be true to weight as listed on the package and provide information about the weight of the product in accordance with relevant Commonwealth and State legislation, including the relevant Trade Practices legislation. 	<ol style="list-style-type: none"> 1 – 3 Check that labelled food products comply with the Food Standards Code (Reference-Guide to the labelling of packaged food) 3 Check AQIS certification, as this checks this information.

<p>Cleaning & maintenance schedule</p>	<p>1 The factory shall document a factory cleaning and maintenance plan in accordance with Export Control (Processed Food) Orders 1985.</p> <p>2 The factory manager shall ensure that the plan is implemented and is effective.</p> <p>3 The maintenance program shall include the calibration of equipment, where necessary.</p>	<p>1-3 Check AQIS or food health accreditation</p> <p>The auditor to view cleaning/sanitisation and maintenance plan; and</p> <p>Preform the cleaning and maintenance pre-operational/prerequisite check list (this check list will be provided to the auditor).</p>
<p>Slaughter procedures</p>	<p>The factory shall have a documented lobster killing procedure in accordance to the industry best practice for humane killing of lobster.</p>	<p>Check that the factory has a documented humane killing procedure; this will be incorporated in the food safety plan.</p>
<p>Cooking, chilling and draining procedures</p>	<p>The factory shall have a documented procedure for the cooking, chilling and draining of product to ensure that the following specifications are met:</p> <ul style="list-style-type: none"> a. product is cooked to a core temperature of 75°C for a minimum of 2 minutes. (eg. approximately 1 minute cooking per 100 grams for up to 2kg and slightly less for animals over 2 kg); b. product is to be cooled to 20°C within 30 mins, and to between -1°C and 4°C within 2 hours; c. all products (live, green, and cooked) is to be drained for a minimum of 5 minutes before packing. 	<p>a,b, c. Check that the factory has documented cooking (Cook until all flesh turns from translucent to white), chilling and draining procedure; this will be incorporated in the food safety plan.</p> <p>The auditor to check the temperature of cooking and chilling of lobsters with a thermometer.</p>
<p>Freezing</p>	<p>Where product is frozen the chamber temperature must be maintained at -18°C or less before packing.</p>	<p>Check freezer temperature and temperature log.</p>
<p>Packing for Export-Live Chilled and Frozen Cooked Chilled or Frozen</p>	<p>The Factory shall comply with Export Control (Processed Food) Orders Schedule 4, Part 6, Live Fish, which shall include;</p> <ul style="list-style-type: none"> a) Live animals shall be tested prior to exporting to ensure conformance with the tail strength test (1 prompt tail curl or spreading of appendages within 10 seconds). Where animals do not meet this specification the product shall be processed. b) Live product shall be chilled to 5 °C -7°C and maintained at this 	<p>1 Check records and audit against Export Control (Processed Food) Orders Schedule 4, Part 6, Live Fish</p> <p>* Check factories food quality specifications and quality records (this should detail a tail strength testing procedure); this will be incorporated in the food safety plan.</p> <p>* Check the products date of receipt (purchase document) and best before date (sales</p>

	<p>temperature for a minimum of 40 minutes prior to being packed into export containers. Animals shall be packed comfortably using food grade packaging material.</p> <p>2 The Factory shall comply with Export Control (Processed Food) Orders Schedule 4, Part 7, Uncooked Fish.</p> <p>3 The Factory shall comply with Export Control (Processed Food) Orders Schedule 4, Part 8, Cooked Fish, which shall;</p> <p>a) Frozen or chilled tails shall be individually wrapped and packed into food grade packaging material.</p> <p>4 The transportation and/or storage time in export containers of frozen product shall not exceed 3 months.</p>	<p>document).</p> <p>2 Check records and audit against Export Control (Processed Food) Orders Schedule 4, Part 7, Uncooked Fish</p> <p>3 The Factory shall comply with Export Control (Processed Food) Orders Schedule 4, Part 8, Cooked Fish</p> <p>4 Check the packaging material and observe a pack-out. The factory should have a packing Standard Operating Procedure; this will be incorporated into the food safety plan.</p> <p>* Check the shipping agents documentation. This will give information on departure and arrival times and dates.</p> <p>* Check freight transportation documents</p>
<p>Time management in distribution to the wholesaler and retailer</p>	<p>1 The time and temperature of product storage and transportation to the wholesaler shall be controlled and recorded, and shall not exceed the following specifications:</p> <p>a) frozen⁵: < 6 months @ <-18°C;</p> <p>b) fresh green⁶: < 24 hours @ between 1°C & 4°C;</p> <p>c) fresh cooked⁷: < 3 days @ between 1°C & 4°C; and</p> <p>d) live⁸: < 36 hours @ between 7°C & 9°C</p> <p>2 Live lobsters shall be held in a holding tank for a minimum of 24 hours prior to being transported live.</p>	<p>1 & 2 Check the products date of receipt (purchase document) and best before date (sales document).</p> <p>Check tank record sheets eg. monitor lobster minimum time in the tank.</p> <p>Check the temperatures log record to confirm conformance of storage temperature.</p>

Alignment to an Environmental Management System

An important part of any Environmental Management System (EMS) is the ability for the system to encourage people to continuously improve over time. This means that actions that are being implemented as part of the program are also monitored to make sure that they are achieving the outcomes industry wants. If the program is not getting the required results, then corrective action is needed.

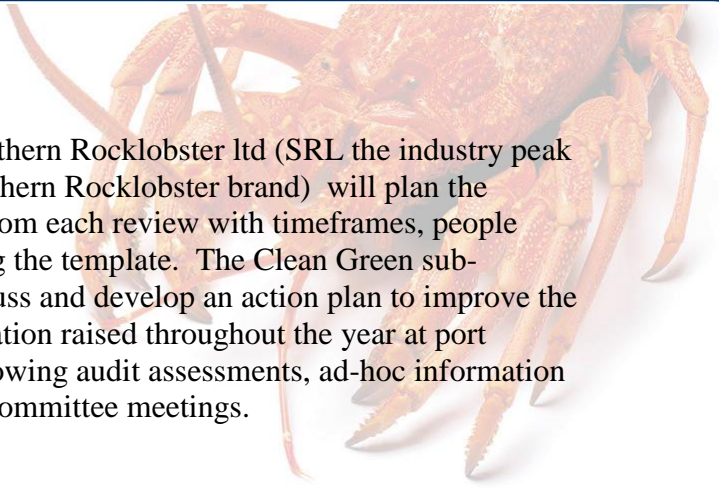
Below is the methodology that will be used to ensure that continual improvement of the standard is achieved;

⁵ Frozen means preserved by the freezing process.

⁶ Green means that the lobster is dead (not undertaking normal functions), but not cooked.

⁷ Cooked means that the lobster is dead (not undertaking normal functions), but has been cooked.

⁸ Live means that the lobster is living (undertaking all normal functions)



Plan

The Clean Green Sub-committee of Southern Rocklobster Ltd (SRL the industry peak body responsible for the Australian Southern Rocklobster brand) will plan the activities that need to be implemented from each review with timeframes, people responsible and associated budgets using the template. The Clean Green sub-committee will meet once a year to discuss and develop an action plan to improve the program. They will consider all information raised throughout the year at port meetings, at meetings with auditors following audit assessments, ad-hoc information raised by industry, and at management committee meetings.

Do

The SRL Executive Officer will ensure that actions are implemented and the outcomes are reflected in the documentation for the Clean Green Strategy⁹ (McShane 2004) which includes:

- Standards;
- Auditing Guidelines;
- Audit Protocol;
- Reference / Training materials (video, 'flip cards');
- Background literature on the Program;
- Trainer's materials (presentations and handouts).

The Executive Officer will communicate with industry and JAS-ANZ on the changes made. Notification will be given to the different categories within the Program (fishery, fishers, transporters, wholesalers, processors and retailers).

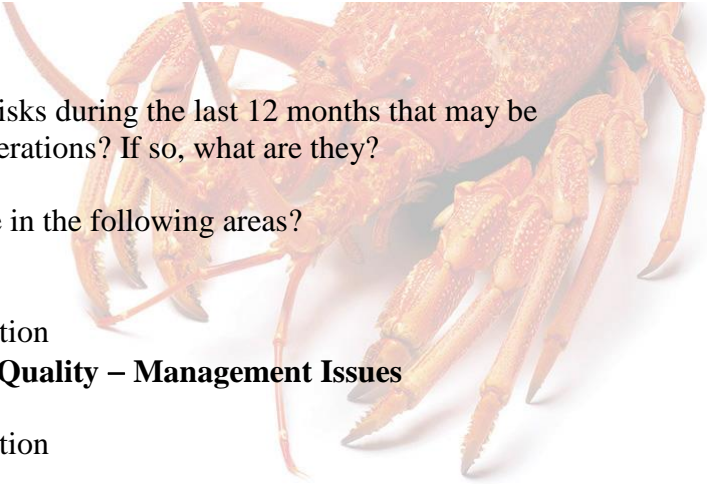
Check

A review of the EMS Program will be managed through SRL on an annual basis. This will be conducted by the Clean Green sub-committee.

The sub-committee will write to every certified member in the program at a different time of the year to the 'Plan step' discussed above, and ask the following questions:

1. What are your general comments regarding the Clean Green Australian Southern Rocklobster Program?
2. Do you have any concerns about any of the standards in the Program, and if so, what are they?
3. Do you have any concerns about any of the outcomes in the Program, and if so, what are they?
4. Do you have any concerns about the auditing guidelines in the Program, and if so, what are they?
5. Have you encountered any near-miss accidents during the last 12 months in your rocklobster operations? If so, what happened?

⁹ These supporting resources have been produced as part of the wider Clean Green Strategy.

- 
6. Have you realised any potential risks during the last 12 months that may be occurring in your rock lobster operations? If so, what are they?
 7. What improvements can be made in the following areas?

POT	Sustainability Bycatch Ecological Interaction Food Safety and Quality – Management Issues
DECK	Ecological Interaction Workplace safety Food Safety and Quality – Management Issues
FACTORY	Food Safety and Quality – Management Issues Food Safety and Quality – Processing

Act

The Clean Green Sub-committee of SRL will manage and facilitate the Clean Green strategy and its continual improvement process on an ongoing basis. The Executive Officer of SRL will follow up on actions raised by the Sub-committee to ensure that they are undertaken within the specified timeframes according to the budgets set.

Then the planning takes place again in the following year.

BENEFITS AND ADOPTION

There are a number of benefits arising from the implementation of the Clean Green strategy (see also McShane 2004).

- a single standard and protocol, allowing evaluation to be carried out by Certification Bodies, who are accredited against the Australian Standard (AS/NZS 3843) General Requirements for Bodies Operating Product Certification Systems;
- harmonisation of existing domestic and export standards;
- the strategy is comprehensive in scope covering the main areas of product safety and legality;
- the strategy creates capacity for purchasers to ensure supply quality and safety aspects;
- the strategy is industry driven and cost effective.

The template of supply chain protocols could be extended to other sectors of the Australian seafood industry by following the pathway successfully taken in the present study. That is:

- assess current work practices in the particular seafood industry sector of concern;
- identify gaps in existing best practice compared with current (or proposed) national and international regulations and legislation;
- draft standards in plain accessible language descriptive of desired best practice align to current requirements (regulations, market, legislation);
- work closely at all times with an appropriate internationally-recognised accreditation agency (JAS-ANZ) and with industry participants;
- obtain and act on -feed back from end users;
- finalise standards and audit protocols;

- 
- develop training programs reflecting standards and audit protocols aligned to modules of the National Seafood Industry Training Package;
 - deliver training;
 - audit participants;
 - aim for and implement continuous improvement.

FURTHER DEVELOPMENT

The Clean Green strategy will be extended throughout the supply chains of rock lobster industries supporting the Australian Southern rocklobster brand through a comprehensive and Industry focused training program (see McShane 2004). Supported by accessible and relevant training materials, the Clean Green strategy will proceed to audit of participants later in 2004 with the aim of having at least the Southern Zone of the South Australian rocklobster industry fully certified by end 2005. To date, more than 200 industry participants have been trained in the Clean Green strategy (in the ports of Port MacDonnell, Beachport, Southend, Robe). Further training is planned for South Australian, Victorian and Tasmanian industry participants.

Further programs are planned to reinforce the traceability elements of the supply chain with indestructible informative electronic tags. This will ensure brand protection and development of greater consumer awareness of the value proposition of the Australian Southern Rocklobster brand.

PLANNED OUTCOMES

A robust template including seafood safety standards has been produced supported by a parallel project which has produced training resources and information kits (McShane 2004). This template is now applicable to other rocklobster industries in Victoria and Tasmania and supports the Australian Southern Rocklobster brand. Importantly, the template has the enthusiastic support of industry participants providing the necessary momentum to achieve a high level, if not unanimous, level of compliance to the Clean Green strategy.

CONCLUSIONS

This project has demonstrated how a commercial fishery through a proactive response to food safety embedded within a wider integrated supply chain management strategy can exceed any comparable system of management applicable to the global seafood industry. By engaging at the grass roots and extending a vision based on the belief of the participants a premium brand Australian Southern Rocklobster is reinforced by demonstrable best practice in food safety at all stages of the supply chain from “pot to plate”. Supported by industry driven training and audit protocols governed by a certification agency (JAS-ANZ), the Clean Green strategy has built pride in performance and extends a premium brand to global seafood markets.

REFERENCE

McShane, P. E. (2004). Proactive environmental management of commercial fisheries – supply chain management of the South Australian rocklobster industry. Final report to the Department of Agriculture, Fisheries and Forestry. Project AAA305.

INTELLECTUAL PROPERTY

The Clean Green strategy and associated concepts underpinning the Integrated Environmental and Product Management system are the property of Southern Rocklobster Ltd. Requests for further information on the Clean Green strategy including rights, and details of audit protocols, should be addressed to the Executive Officer Southern Rocklobster Ltd, Level 1, 16 Unley Rd, Unley SA 5061. For further information contact Southern Rocklobster Ltd on 1300 853880 or visit the website www.southernrocklobster.com.

The Clean Green Australian Southern Rocklobster Audit Protocol



This is the property of Southern Rocklobster Limited



Contents

Definitions	24
INTRODUCTION	25
CONFORMITY ASSESSMENT BODY SELECTION	26
ORGANIZATION/ CAB CONTRACTUAL ARRANGEMENTS	27
AUDIT PROCEDURES	28
Initial Audit	28
Pre-Audit Requirements.....	28
Scope of Audit.....	28
Audit Duration	28
Audit Methodology	29
Corrective Action Requests	30
Closing Meeting	31
Audit Reporting	31
Certification Decision	31
SURVEILLANCE.....	32
Notification of Change.....	33
AUDITOR COMPETENCIES	34
USE OF THE CLEAN GREEN AUSTRALIAN SOUTHERN ROCKLOBSTER CERTIFICATION MARK	35
INTERPRETATIONS OF STANDARDS AND/OR PROTOCOL	35
APPENDIX 1- Corrective Action Request or Non Conformity Report	36
APPENDIX 2-CONTINUAL IMPROVEMENT (PLAN, DO, CHECK, ACT).....	37
APPENDIX 3- Certification Mark Licence Terms and Participation Agreement	40

Definitions

CAB- Conformity Assessment Body

CARs- Corrective Action Requests

CG- Clean Green

CGSRLS- Clean Green Southern Rocklobster Standard

GMP- Good Manufacturing Practice

JAS-ANZ- Joint Accreditation System of Australia and New Zealand

Organization- means company, organization, entity or person applying for certification by a CAB

Rocklobster Fishery- A discrete fishing zone for the purpose of management

RPL- Recognition of Prior Learning

RCC- Recognition of Current Competencies

SRL- Southern Rocklobster Limited



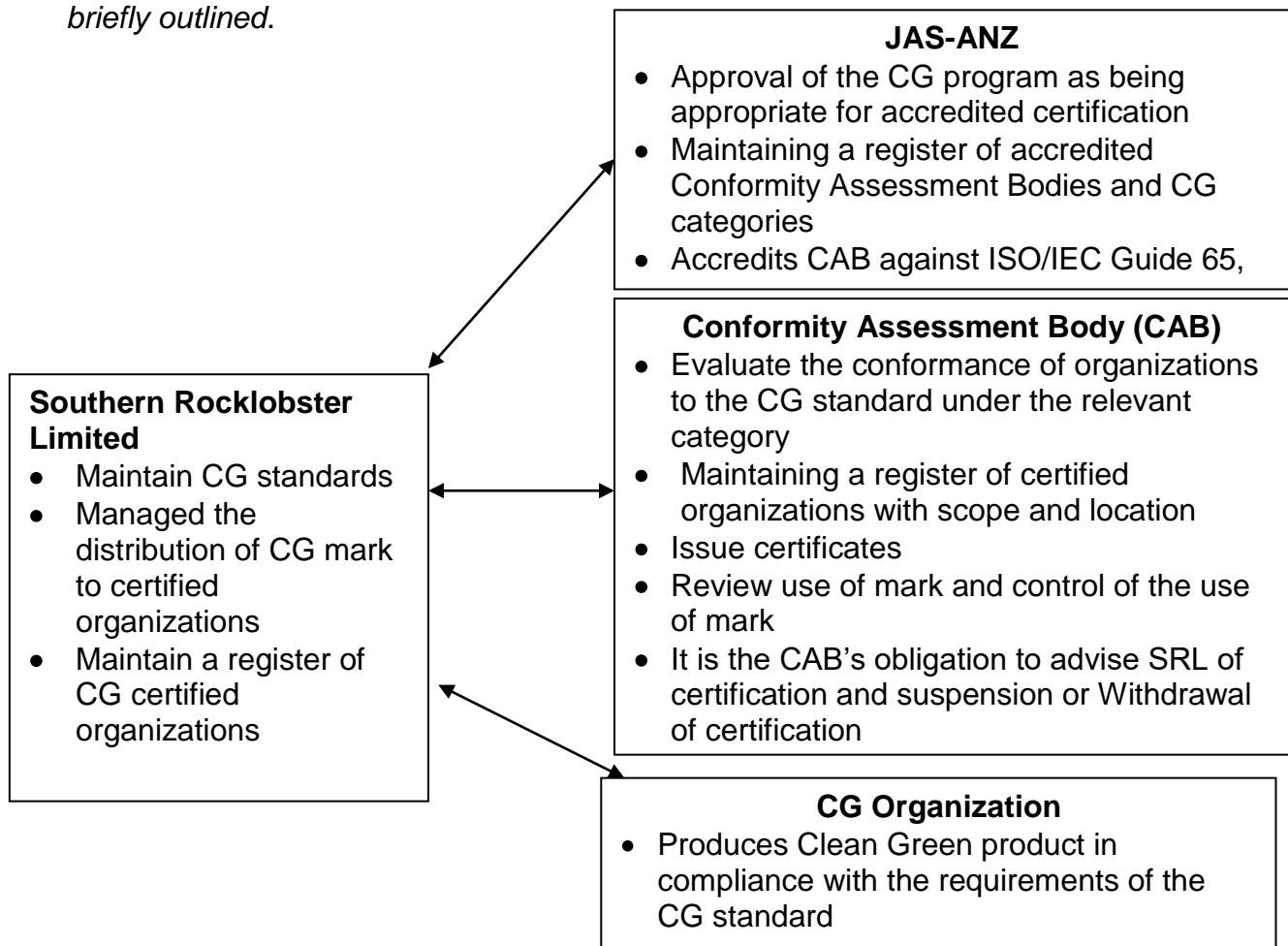


INTRODUCTION

The Clean Green product certification scheme covers entities within the Southern Rocklobster supply chain. Entities within the supply chain are certified for conformance by 3rd party auditing. Such entities would include catching vessels, transport vehicles, processing facilities and retailers.

The audit protocol provides the specific requirements for those Conformity Assessment Bodies (CAB) involved with audit against the Clean Green Southern Rocklobster Standard (CGSRLS) (Figure 1).

Figure 1. A systematic flow chart outlining the relationship between all parties involved in the Clean Green Certification program. The duties of each body are briefly outlined.



There will be five categories of certification under the CGSRLS from ‘pot-to-plate’, these include;

<i>Categories</i>	<i>Applicable section of the standard</i>
Clean Green Fishery	Pot (1.1- 1.4)
Clean Green Fisher	Pot – Deck (2.1-16.1)
Clean Green Transport	Deck-Factory (17.1-17.3) Factory-Retail (27.1-27.2)
Clean Green Wholesaler & Processor	Factory (18.1- 26.3)
Clean Green Retail	Plate (28.1- 30.1)

Organizations applying for certification will need to meet the requirements identified in the applicable standards under the Clean Green program, which are outlined above. If an organization has multiple sites each site needs to be certified.


Only those CABs that have been accredited by JAS-ANZ to ISO/IEC Guide 65, JAS-ANZ Procedure 15, the requirements of this document, and having the appropriate scope, shall carry out audits against the CGSRLS, and issue certificates.

CONFORMITY ASSESSMENT BODY SELECTION

The organization shall appoint an accredited CAB to evaluate their conformance to the CGSRLS. The CAB shall evaluate the organization against the relevant sections of the CGSRLS, relative to the scope (category) of certification sought.

However, Southern Rocklobster Limited (SRL) recognises that to achieve accreditation, Conformity Assessment Bodies seeking accreditation must demonstrate their ability to carry out audits against the CGSRLS. Therefore a CAB shall be allowed to carry out audits prior to achieving accreditation status, where they can demonstrate the following:

- An active application for accreditation with JAS-ANZ for this product certification scheme;
- Accreditation is achieved within 6 months of the date of application; and
- Individual evaluator qualification and experience for specific product categories is consistent with the standards given in this document.



The acceptability of audit reports generated by CABs awaiting accreditation but meeting the above criteria is at the discretion of SRL.

It is the responsibility of the organization seeking certification to verify the status of the CAB, by either requesting a copy of their accreditation certificate (or acknowledgement of application) and scope, or by contacting JAS-ANZ, who holds details of all accredited CABs, or by searching the JAS-ANZ Register, which is available on-line at www.jas-anz.com.au.

ORGANIZATION/ CAB CONTRACTUAL ARRANGEMENTS

A contract shall exist between the organization and the CAB as required by ISO/IEC Guide 65 and including; the scope of certification, reporting requirements, and requirements for control of the use of the Clean Green mark.

AUDIT PROCEDURES

Initial Audit

Following the organization's decision to use a CAB, the first audit will be conducted on a mutually convenient date, with due consideration given to the amount of work to meet the requirements of the Standard and the time required to conduct an effective audit.

Pre-Audit Requirements

Before the initial audit, the organization is required to review the CGSRLS, and make any necessary amendments or improvements to its operation and systems. The CAB shall require the organization to provide, through an application form, the necessary information regarding the scope of the organization's activities to facilitate audit planning. This information shall include:

- Name and legal standing of organization applying for certification;
- Addresses of sites where activities are undertaken;
- Scope of activities undertaken at each site;
- Number of employees employed at each site

Scope of Audit

The scope of the audit shall be defined between the organization and the CAB. The scope shall be identified in the audit report and the certification documents. The organization may contract the CAB to evaluate matters beyond the scope of the CGSRLS, but no relevant elements of the CGSRLS shall be omitted. Assessment additional to the scope of the audit does not form any part of this product certification program.

Audit Duration

Duration of audits will be dependant upon a number of factors, but due regard must be given to:

- size of site;
- the types of processes to catch, handle, process, pack or store product;
- number of product types/lines;
- the number of employees involved with handling, safety control, production and storage; and
- if applicable, the number of nonconformities recorded in the previous audit.

The CAB shall provide the organization with an indication as to the anticipated duration of the audit, prior to carrying out the visit, which will take into account the factors specified above. However, this shall be regarded as being an estimated time scale as the auditor may require additional time to carry out the audit if issues arise during the site visit on the day. CABs shall keep adequate records to be able to justify audit durations allocated.



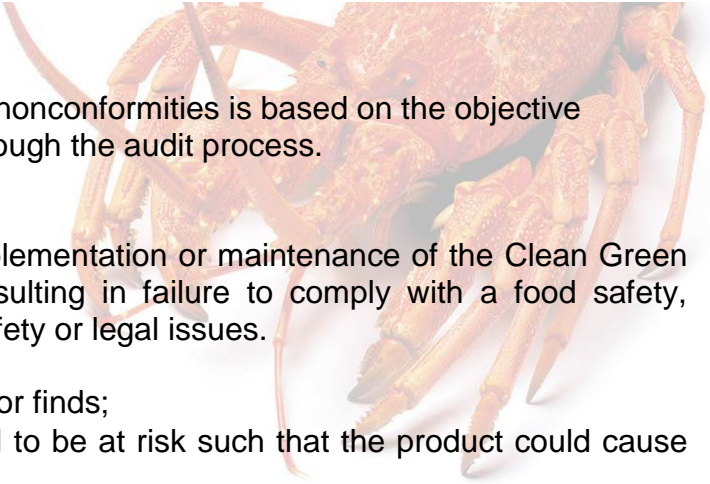
Audit Methodology

All audits shall meet the requirements of AS/NZS ISO 19011:2003- *Guidelines for quality and/or environmental management systems auditing*. The auditor shall allocate sufficient time to ensure there is appropriate attention given to the systems review and the physical inspection of the site and associated processes.

Audits shall be conducted whilst the category is or has been in operation (e.g. the fishing season is open and fishing operations have started for the season and processing activities have been underway), so the applicant/certified organization can accumulate sufficient audit evidence to demonstrate compliance with the standards. There is no need for an auditor to accompany a vessel on fishing operations.

During the audit detailed notes shall be made of the organization's ability to comply with the CGSRLS and will be the basis for the audit report and the decision on certification.

In order to determine whether compliance with a clause in the CGSRLS has been met, the auditor shall assess the nature and significance of any nonconformity. There are two levels of nonconformity:



The classification of critical or minor nonconformities is based on the objective evidence that has been collected through the audit process.

Critical

There is complete breakdown in implementation or maintenance of the Clean Green Southern Rocklobster Standard, resulting in failure to comply with a food safety, quality, environmental, workplace safety or legal issues.

These may be raised where the auditor finds;

- Safety of the product is found to be at risk such that the product could cause serious risk to health
- Where product quality specifications are not being met leading to sub standard product
- Where the product or processes are found to contravene regulatory requirements

Minor

This is where absolute compliance to a clause of the standard has not been demonstrated, but on the basis of objective evidence the conformity of the product's safety and legality is not in doubt.

The auditor may classify audit findings as Minor nonconformities where;

- Observed practices do not conform to the standards but are not affecting product safety and quality or environmental and workplace safety issues.
- Where improvements or modifications addressing requirements of the CGSRLS may be required

Corrective Action Requests

All nonconformities shall be reported on a Corrective Action Request (CAR) as per Appendix 1. The content of Appendix 1 is mandatory, but the CAB has the flexibility in terms of layout e.g. reports are encouraged to be electronic in nature.

Critical

The auditor will raise a CAR and notify the organization's owner and management and SRL, requiring corrective action to be taken immediately. The auditor in conjunction with the organization shall ensure that all critical nonconformities are closed out within 7 days of the audit date unless otherwise agreed in writing by SRL.

If a critical non conformity raised at surveillance is not close-out it will result in a loss of certification.



Minor

A corrective action request (CAR) is to be raised by the auditor and followed up again at the next surveillance audit if not already closed out at a re-visit.

Where minor nonconformities are raised at surveillance audits corrective action shall be submitted and verified within an agreed timeframe. If the CAR is not closed out by the agreed date, the audit or will action as though the nonconformity is classified as critical. Suspension or Withdrawal of certification shall follow if the organization continues to be non-compliant.

Closing Meeting

A closing meeting shall be conducted in accordance with ISO 19011 Clause 6.5.7. At the closing meeting, the auditor shall present the findings, and discuss all nonconformities that have been identified. The organization's representative shall be asked to acknowledge the nonconformity by signing the CAR. The auditor will discuss the process to be followed in the event that CARs have been raised and the recommendations to be made in the audit report once the nonconformities have been closed to the auditor's satisfaction. The auditor shall make it clear that the decision to award certification will be made independently by the CAB, following a detailed technical review of the audit report.

The CAB shall make available a copy of the report to the organization within 10 working days of the completion of the audit. The organization will have to complete Section 2 of the CAR and return to the CAB for consideration.

Audit Reporting

Following each audit a written report shall be prepared as per ISO 19011 Clause 6.6.1, and also include the following:

- audit summary (electronic version of the auditors checklist) – overview of performance; and
- details of nonconformity(ies) and corrective action plan (Appendix 1).

The audit summary report shall include comment where criteria have been met, particularly where improvement or enhancement is evident. The CAB shall make available a copy of the report to the organization within 10 working days of the completion of the assessment. All copies of audit reports will also be forwarded to Southern Rocklobster Limited in accordance with the certification mark licensing agreement.

Certification Decision

The CAB can issue a certificate to the applicant organization once:

- all critical nonconformities have been closed (corrected and the corrective action verified by the CAB), and
- the CAB accepts the evidence or action plan provided by the organization in response to a minor nonconformity(s) being raised.



The certificate shall include:

- Name, Vessel(s) name & licence number (if applicable) and address of the organization certified,
- Scope of certification, including category of CGRLS assessed against, and the products produced by the organization,
- CG Certification mark,
- CAB Certification mark
- JAS-ANZ mark,
- SRL logo
- Date of certification & certification number,
- The certificate is valid for 3 years from the date of certification decision.

Where an organization has certification suspended or withdrawn, the organization must inform their customers of this change in status. Where suspension or withdrawal of certification occurs, the CAB shall:

- Ensure that the organization notify their customers of the change in status,
- Ensure that the organization ceases to use the certification mark on product, marketing material or stationary,
- Amend the JAS-ANZ Register, and
- Notify SRL.

SURVEILLANCE

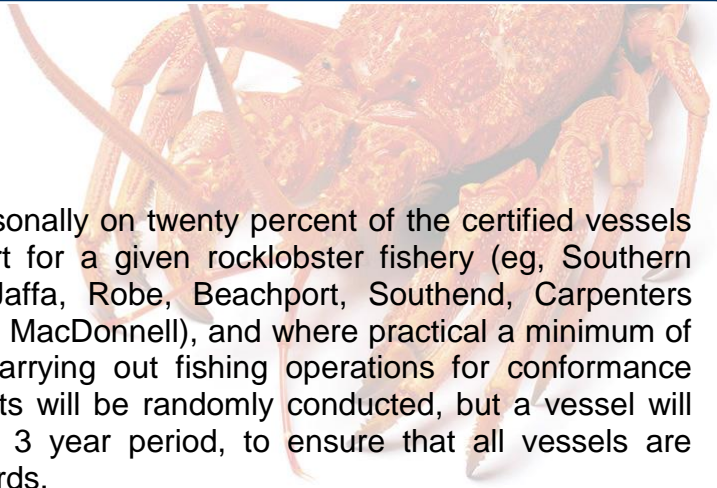
Audit Frequency

Category	Minimum Audit Frequency/type of audit
Fisheries	Annual CAB audit
Fisher/vessel	Annual CAB audit (percentage sampling plan)
Factory	Annual CAB audit, AQIS audit
Retailer	Annual CAB audit
Transport	Annual CAB audit

Before surveillance audits, the organization is recommended to review the CGSRLS, and to identify and rectify any changes to their organization's operations, which are deemed necessary to ensure that the Clean Green Southern Rocklobster Standard requirements continue to be met.

Clean Green Rocklobster Fishery (eg, Northern Zone Rocklobster Fishery and Southern Zone Rocklobster Fishery);

A document review will be conducted every 12 months by the CAB for conformance against standards 1.1-1.4.



Clean Green Rocklobster Fisher Rocklobster Vessel;

The CAB shall carry out audits seasonally on twenty percent of the certified vessels in each recognised rocklobster port for a given rocklobster fishery (eg, Southern Zone Rocklobster fishery- Cape Jaffa, Robe, Beachport, Southend, Carpenters Rocks, Blackfellows Caves and Port MacDonnell), and where practical a minimum of 1 vessel shall be audited whilst carrying out fishing operations for conformance against standard 2.1-16.1. All audits will be randomly conducted, but a vessel will not be audited more than twice over a 3 year period, to ensure that all vessels are continually conforming to the standards.

If vessels are not conforming to the standards more rigorous sampling may be required. SRL should be consulted.

Whilst the product certification program is about individual organisations applying to the CAB for certification, the surveillance audits involves a sampling system whereby two or more CABs may conduct audits within a rocklobster fishery. If this is the case SRL will facilitate in conjunction with the applicants & CABs a process for selection of vessels from the fishery for surveillance audits.

Bait storage:

Fishers and factories both store bait for rocklobster fishing. This section refers to the fishers storing their own bait and fisher's facilities should be audited in accordance to the rocklobster vessel sampling methodology.

If vessels are not conforming to the standards more rigorous sampling may be required and will be negotiated with SRL.

Clean Green wholesaler and processor

Factories:

The CAB shall carry out at least one scheduled audit per annum on each certified factory whilst in operation. Factory transportation vehicles may be covered under the factories approved supplier program. The audit will check for conformance against standard 18.1-26.3, with the focus being based around quality and GMP.

Clean Green Retail:

The CAB shall carry out one scheduled audit per annum for conformance against the standards 28.1-30.1.

Clean Green Transportation:

Transportation vehicles may be covered through the factory audit process, but if not the CAB shall carry out one scheduled audit per annum for conformance against standards 17.1-17.3 & 27.1-27.2.

Notification of Change

If there is a change in the organization such as change of ownership, premises or products produced, the organization shall inform the CAB who will take the appropriate action.

AUDITOR COMPETENCIES

The CAB has full responsibility with respect to the identification of competent personnel to conduct audits. The CAB will use auditors and lead auditors who meet the relevant RABQSA Inc. registration requirements in one of the nominated discipline areas. If a single auditor is to be used they must meet the RABQSA Inc. lead auditor registration requirements in one of the listed disciplines and can provide evidence of competencies in the other disciplines to be audited. Auditors under training must be accompanied by a lead auditor who is deemed competent by the CAB to undertake the audits.

Competency requirements;

REQUIREMENTS	DISCIPLINE		
	Food Safety (HACCP)	OH&S	Environment Management
Tertiary Qualifications or RPL/ RCC ¹⁰ in at least one of the 3 disciplines			
Auditing competencies (maybe RPL/RCC) in all of the 3 disciplines	Audit competencies and working knowledge of the standards Eg, Codex Alimentarius	Audit competencies and working knowledge of the standards Eg, AS 4801	Audit competencies and working knowledge of the standards Eg, ISO 14001
Lead Auditors and Auditors must meet RABQSA Inc. auditor registration in at least one of the 3 disciplines: Food Safety (HACCP), OH&S and Environmental Management systems			
Awareness of industry requirements	Understanding of the food processing in the seafood industry	Competent in OHS legislation and requirements	Understanding of environmental management in the Seafood industry

The criteria are considered the minimum competencies required by auditors who assess against the CGSRLS.

All auditors shall complete the following basic training prior to undertaking audits;

- Field visits covering the a Rocklobster vessel and factory; and
- Introduction videos, flip cards and Clean Green training supplied by SRL.

¹⁰ RPL- Recognition of Prior Learning
RCC- Recognition of Current Competencies



***USE OF THE CLEAN GREEN AUSTRALIAN SOUTHERN
ROCKLOBSTER CERTIFICATION MARK***

The Clean Green Southern Rocklobster Certification Mark is copyright and a trademark, owned by Southern Rocklobster Limited. The usage of the Clean Green Certification Mark is regulated and governed by Southern Rocklobster Limited and the use of this mark is only permissible with the formal licensing agreement of SRL (Appendix 3).

Use of the mark will be audited by the CAB.

INTERPRETATIONS OF STANDARDS AND/OR PROTOCOL

Southern Rocklobster Limited will be responsible for the formal annual review of the standards, protocol and any interpretations of the standards and/or protocol. All certified Clean Green (CG) Rocklobster fishers, transportation companies, wholesalers, processors, retailers and the CAB will be formally notified in writing of the alterations made to the CG standards upon completion of the annual review.

It is the organization's and CAB's responsibility to ensure that they are using the most up to date issue of the CGSRLS.

Appendix 2 is a guidance document for the continual improvement of the Clean Green Southern Rocklobster standard.

APPENDIX 1- Corrective Action Request or Non Conformity Report

Corrective Action Request or Non Conformity Report

File Ref:		Client:			
Std. and Clause No(s)					
Site Address/Vessel:					
Audit type:	Initial	Surveillance	CAR type:	Critical	Minor

Section 1: Details of Non Conformity(s):

--	--	--	--	--	--

Auditor:		Organization's acknowledgement:			
Date:					

Section 2: Organization's Proposed Action Plan:

Root cause analysis (how/why did this happen?):

--	--	--	--	--	--

Corrective Action (fix now) with completion dates:

--	--	--	--	--	--

Corrective Action (to prevent future recurrence) with completion dates:

--	--	--	--	--	--

Organization Representative name		Auditor acceptance:			
Date		Date			

Section 3: Verification of organization's implementation of action plan:

--	--	--	--	--	--

Auditor:	Closed and cleared?	Yes	No	Date	
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APPENDIX 2-CONTINUAL IMPROVEMENT (PLAN, DO, CHECK, ACT)

An important part of any management system is the ability for the system to encourage people to continuously improve over time. This means that actions that are being implemented as part of the program are also monitored to make sure that they are achieving the outcomes industry wants. If the program is not getting the required results, then corrective action is needed.

Below is the methodology that will be used to ensure that continual improvement of the standard is achieved.

PLAN

The Clean Green Sub-committee of SRL will plan the activities that need to be implemented from each review with timeframes, people responsible and associated budgets using the template. The Clean Green Sub-committee will meet once a year to discuss and develop an action plan to improve the program. They will consider all information raised throughout the year from the relevant stakeholders, including;

- Individual Clean Green organizations
- Port associations,
- Auditors and Conformity assessment Bodies,
- Regulators,
- ad-hoc information raised by industry at FMC meetings and by Environment Australia following the issuing of five year exemptions under Schedule 4 of the Wildlife protection Act (regulations of exports & imports) 1982.

DO

The SRL Executive Officer will ensure that actions are implemented and the outcomes are reflected in the documentation for the Program that includes:

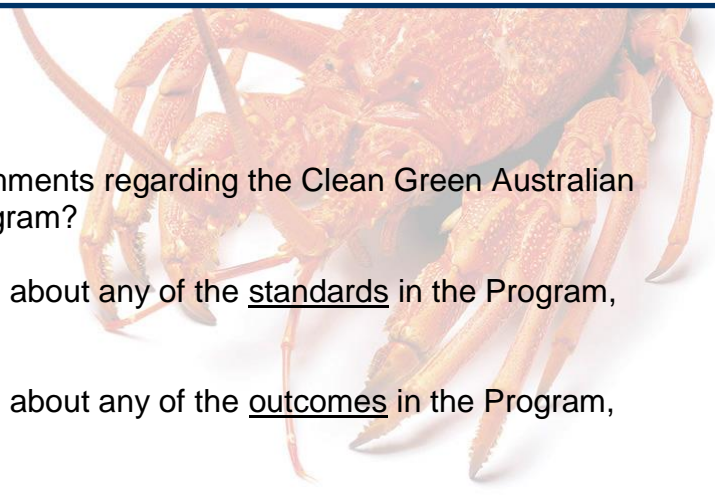
- Standards
- Auditing Guidelines
- Audit Protocol
- Reference / Training materials (video, 'flip cards')
- Background literature on the Program,
- Trainer's materials (presentations and handouts).

The Executive Officer will communicate with industry and JAS-ANZ on the changes made. Notification will be given to the different categories within the Program (fishery, fishers, transporters, wholesalers, processors and retailers).

CHECK

A review of the Program will be managed through SRL on an annual basis. This will be conducted by the Clean Green Sub-committee.

The Sub-committee will write to every certified member in the program at a different time of the year to the 'Plan step' discussed above, and ask the following questions:



8. What are your general comments regarding the Clean Green Australian Southern Rocklobster Program?
9. Do you have any concerns about any of the standards in the Program, and if so, what are they?
10. Do you have any concerns about any of the outcomes in the Program, and if so, what are they?
11. Have you encountered any near-miss accidents during the last 12 months in your rocklobster operations? If so, what happened?
12. Have you realised any potential risks during the last 12 months that may be occurring in your rocklobster operations? If so, what are they?
13. What improvements can be made in the following areas?

POT	Sustainability Bycatch Ecological Interaction
DECK	Ecological Interaction Workplace safety Food Safety and Quality – Management Issues
FACTORY	Food Safety and Quality – Management Issues Food Safety and Quality – Processing
PLATE	Food Safety and Quality - Processing

SRL will also write to every Clean Green Category and ask why they have not become involved in the program as this will highlight any issues that may need to be addressed.

A process has been implemented to allow easy reporting of risks and accidents by industry that will trigger an alert to review an aspect of the Program.

At the top of all information relating to the program, especially the 'flip cards' for use by rocklobster operators, the following information will be specified in writing:

For improvements or to report issues:
phone 1300 853 880
email info@southernrocklobster.com or
log onto www.southernrocklobster.com



ACT

The Clean Green Sub-committee of SRL will manage and facilitate the Australian Clean Green Rocklobster Program and its continual improvement process on an ongoing basis. The Executive Officer of SRL will follow up on actions raised by the Sub-committee to ensure that they are undertaken within the specified timeframes according to the budgets set.

Then the planning takes place again in the following year.

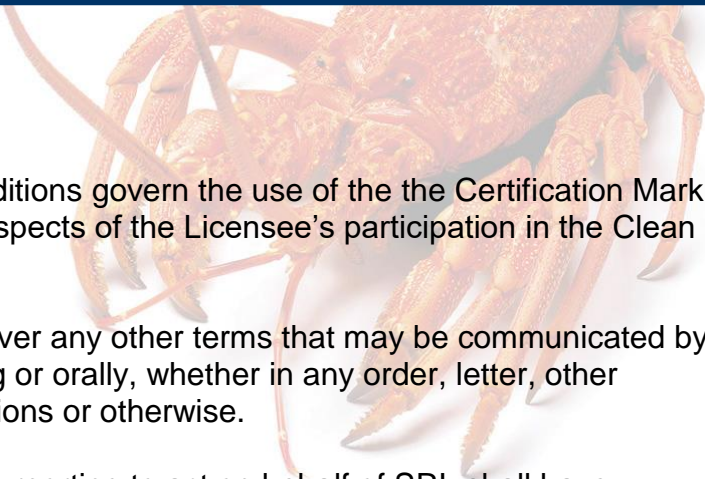
APPENDIX 3- Certification Mark Licence Terms and Participation Agreement

Southern Rocklobster Limited

Clean Green Program

**Certification Mark Licence and
Participation Agreement**

Terms and Conditions



1. APPLICABILITY

- 1.1 These terms and conditions govern the use of the the Certification Mark by the Licensee and some aspects of the Licensee's participation in the Clean Green Certification Scheme.
- 1.2 These terms prevail over any other terms that may be communicated by the Licensee in writing or orally, whether in any order, letter, other document, in negotiations or otherwise.
- 1.3 No person acting or purporting to act on behalf of SRL shall have authority to waive or change these terms orally. Waivers or changes shall have effect only if made in writing and signed by a duly authorised officer of SRL.
- 1.4 SRL may vary these terms at any time by notifying the Licensee in writing, including any variation necessary to satisfy any direction given.

2. INTERPRETATION

- 2.1 In these terms:

'CAB' means a conformity assessment body accredited to perform a Certification Audit;

'Certificate' means a certificate of registration issued by a CAB to the Licensee to record Certification;

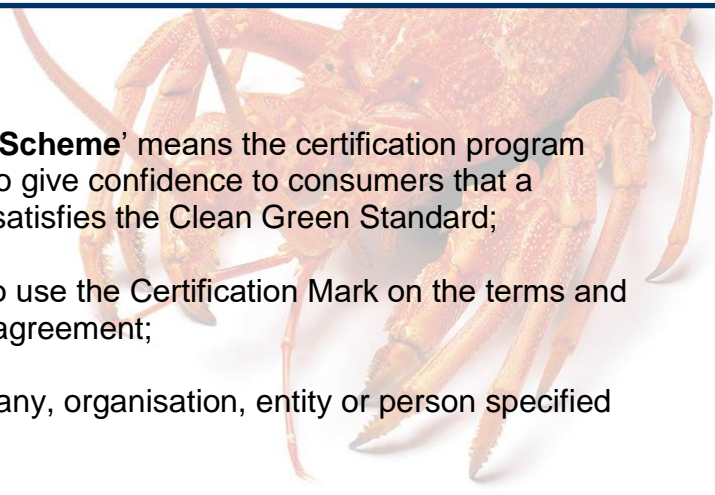
'Certification' means certification granted by a CAB under the Clean Green Certification Scheme subject to the Certification Terms;

'Certification Audit' means an audit conducted to assess a product, process or service for the purpose of grant or maintenance of Certification;

'Certification Terms' means the terms upon which a CAB has conducted a Certification Audit and granted Certification subject to the Clean Green Standard;

'Certification Mark' means the certification mark specified in a Certificate;

'Clean Green Standard' means the applicable set of standards used for the Clean Green Certification Scheme which sets the benchmark for Certification;



‘Clean Green Certification Scheme’ means the certification program operated by SRL designed to give confidence to consumers that a product, process or service satisfies the Clean Green Standard;

‘Licence’ means a licence to use the Certification Mark on the terms and conditions contained in this agreement;

‘Licensee’ means the company, organisation, entity or person specified in the Certificate;

‘Materials’ means products, and information and promotional material about the Licensee’s products, processes or services which use or refer to a Certification Mark;

‘Rules’ means the applicable rules and directions governing the use of a Certification Mark issued by SRL from time to time;

‘SRL’ means Southern Rocklobster Limited ACN 108 116 847.

3. LICENCE

3.1 The issue of a Certificate and Licence grants to the Licensee a non-exclusive licence to use the Certification Mark specified in the Certificate:

- (a) on the terms and conditions of this agreement;
- (b) commencing on the issue of the Certificate for the period specified in the Certificate (unless terminated earlier in accordance with this agreement); and
- (c) in relation to the processes, sites, standards or other specifications as set out in the Certificate.


3.2 The issue of the Licence does not restrict SRL’s right to use or license the use of the Certification Mark to any other person.

4. LICENSEE’S OBLIGATIONS

General

4.1 The Licensee must:

- (a) ensure that the Certification Mark is only used in accordance with the terms and conditions contained in this agreement;
- (b) not use the Certification Mark in any way which causes confusion or deception or would be likely to deceive or cause confusion;

- 
- (c) not make any representation to any party about the Licensee's rights to the Certification Mark which are misleading or deceptive;
 - (d) ensure that the Certification Mark is used in accordance with any guidelines or directions SRL may publish from time to time.

Additional Obligations for Manufactured Goods

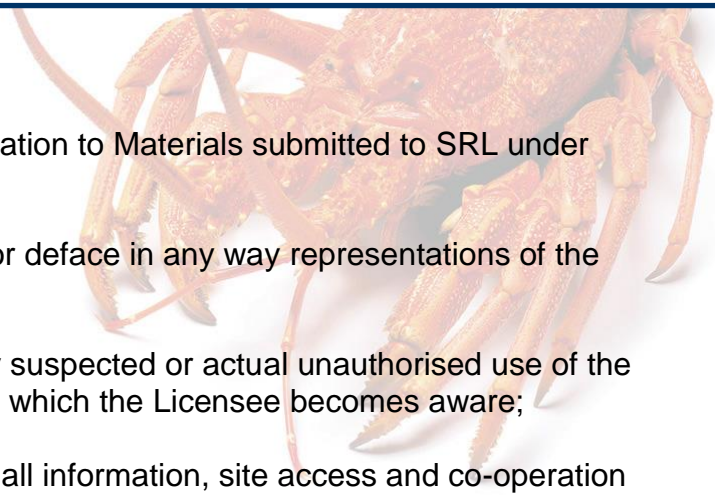
4.2 Where the Licence relates to a product that is a manufactured good, the Licensee must ensure that:

- (a) when physically applied to goods, the Certification Mark is:
 - (i) applied only to goods that comply with applicable food safety labeling requirements; and
 - (ii) applied to goods prior to their dispatch from a site covered by the Certification; and
 - (iii) applied only to goods that meet product specifications detailed in the Clean Green Standard;
- (b) when, after having obtained from SRL approval to do so, the Certification Mark is physically applied to components manufactured by a contractor or agent of the Licensee, prior to further processing or assembly the Licensee submits to the CAB which has granted Certification to the Licensee, for its prior approval, details of the contractor or agent, and makes arrangements to guarantee access of the CAB to the premises of the contractor or agent, unless otherwise approved in writing by a duly authorised officer of SRL.

Use of Certification Mark

4.3 The Licensee agrees with SRL:

- a) to use the Certification Mark in accordance with the terms and conditions set out in this agreement and any reasonable directions that may be issued by SRL from time to time including directions in relation to statements acknowledging that the Licensee does not own the Certification Mark, directions about the location, size and method of display of the Certification Mark and directions about what words may be used in association with the Certification Mark;
- b) on request by SRL, to provide SRL with samples of Materials;
- c) to promptly correct any failure to comply with paragraph (a), including by complying with any timely and reasonable directions



issued by SRL in relation to Materials submitted to SRL under paragraph (b);

- d) not to alter, modify or deface in any way representations of the Certification Mark;
- e) to report to SRL any suspected or actual unauthorised use of the Certification Mark of which the Licensee becomes aware;
- f) to provide SRL with all information, site access and co-operation reasonably requested by SRL to verify and ensure compliance with these terms;
- g) not to represent that it owns or has any rights in relation to the Certification Mark other than set out in this agreement;
- h) not to question or challenge the validity or SRL's ownership of the Certification Mark;
- i) not to apply for registration of any trade mark or business, company or domain name that incorporates any name or logo the same as, substantially identical with or deceptively similar to the Certification Mark, without the consent of SRL;
- j) to make and keep a record of all complaints relating to the use of the Certification Mark and, upon request by SRL, to make these records (and a copy thereof if requested by SRL) available to SRL.

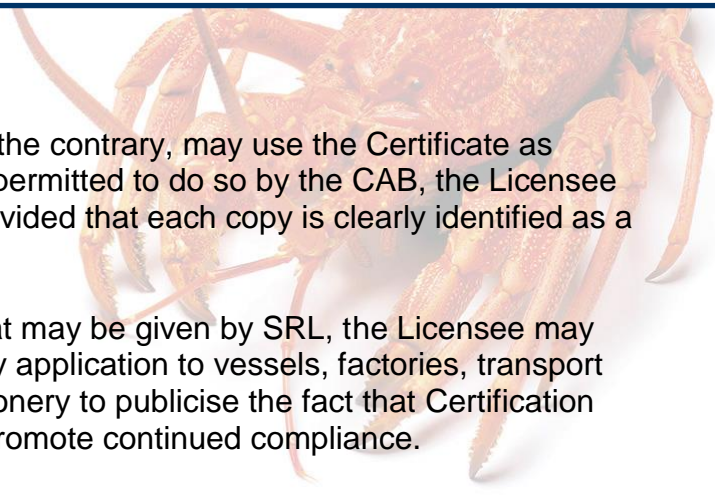
Application of Certification Mark

4.4 The Licensee agrees with SRL that:

- a) before applying the Certification Mark to any item, the Licensee must obtain from SRL an authorised electronic copy of the Certification Mark, and must in applying it to any item reproduce it in exactly the same proportions and colours as the authorised electronic version; and
- b) the original artwork and computer images of the Certification Mark remain the property of the SRL and must be returned immediately if requested by SRL. SRL is and remains the owner of the copyright in the Certification Mark.

5. USE OF CERTIFICATE AND PUBLICITY

- 5.1 The Licensee must not without SRL's prior written permission alter, modify, deface or destroy the Certificate,
- 5.2 Subject to any directions that may be given by SRL, the Licensee may publicise the fact that the Licence has been granted and, subject to any



requirements of the CAB to the contrary, may use the Certificate as evidence of the Licence. If permitted to do so by the CAB, the Licensee may copy the Certificate provided that each copy is clearly identified as a copy.

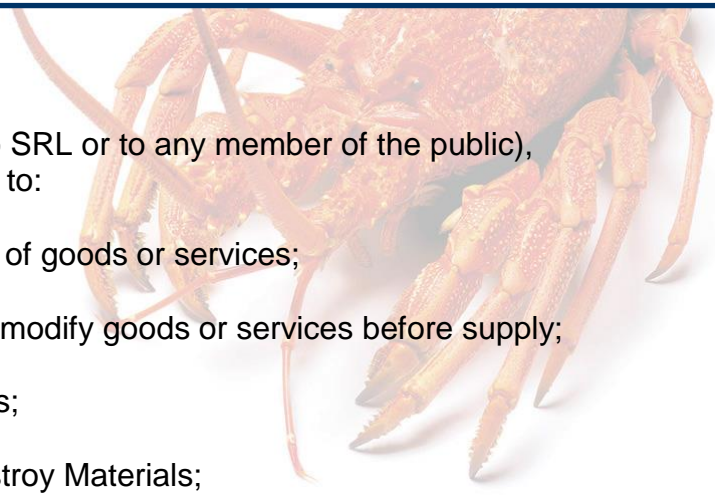
- 5.3 Subject to any directions that may be given by SRL, the Licensee may use the Certification Mark by application to vessels, factories, transport vans packaging and/or stationery to publicise the fact that Certification has been achieved and to promote continued compliance.
- 5.4 Subject to any directions that may be given by SRL the Licensee may use the Certification Mark by application to packaging and/or the product if the product specifications are complied with to publicise the fact that Certification has been achieved and to promote continued compliance.

6 LICENSEE'S WARRANTY AND INDEMNITY

- 6.1 The Licensee warrants to SRL that at all times the Licensee will use the Certification Mark only in accordance with the terms of the Licence, unless otherwise approved in writing by SRL.
- 6.2 The Licensee indemnifies SRL from and against all losses, damages, expenses and costs (on a solicitor and own client basis and whether incurred by or awarded against SRL) that SRL may sustain or incur as a result, whether directly or indirectly, of:
- (a) any breach of these terms by the Licensee (including, but not limited to, a breach in respect of which SRL exercises an express right to terminate this agreement); or
 - (b) any negligent act or omission or willful misconduct of the Licensee or its officer, employees and agents;
 - (c) any loss or damage to any property or injury to or death of any person resulting, wholly or partly, from any product, process or service in relation to which the Certification Mark has been used by the Licensee.

7. ADDITIONAL REMEDIES FOR BREACH OF WARRANTY

- 7.1 If the Licensee breaches any warranty in clause 6.1, or any other provision of these terms the Licensee must at its cost:
- (a) immediately notify SRL of the breach and provide any information reasonably requested by SRL;
 - (b) promptly comply with any directions that SRL may issue to prevent further breach or minimise the adverse consequences of



the breach (either to SRL or to any member of the public), including a direction to:

- (i) cease supply of goods or services;
 - (ii) take steps to modify goods or services before supply;
 - (iii) destroy goods;
 - (iv) modify or destroy Materials;
 - (v) provide information (including Materials) to the public; and
 - (vi) where the breach relates to goods already released for sale and which will or may cause injury to any person:
 - (a) undertake a recall of the goods; and
 - (b) take such other action as may be reasonably requested by SRL;
 - (vii) cease representing, either expressly or by implication, that they have any current Certification or License;
- (c) keep SRL informed, in writing, of action taken pursuant to any direction issued under paragraph (b).

8. FEES

If so requested by SRL, the Licensee must pay to SRL the fees specified in SRL's Schedule of Fees (or elsewhere) as amended from time to time.

9. SRL'S WARRANTY

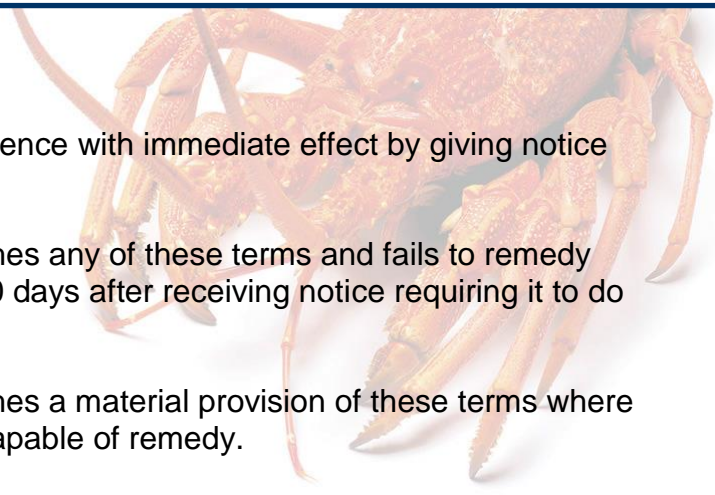
SRL warrants that it has the rights required to grant the Licence to the Licensee.

10. TERMINATION

10.1 The Licence terminates on the earlier of:

- (a) the expiry date specified in the Certificate;
- (b) the termination or cancellation of the Licensee's Certification; or
- (c) the termination of the Licence under this clause 10.

10.2 The Licensee may terminate the Licence upon giving written notice to SRL.



10.3 SRL may terminate the Licence with immediate effect by giving notice to the Licensee if:

- (a) the Licensee breaches any of these terms and fails to remedy the breach within 30 days after receiving notice requiring it to do so; or
- (b) the Licensee breaches a material provision of these terms where that breach is not capable of remedy.

10.4 If the Licensee's Certification is suspended, cancelled or expires, the Licensee must promptly:

- (a) notify SRL; and
- (b) furnish SRL with all information reasonably requested by SRL to ascertain the nature and extent of the suspension, cancellation or expiration.

10.5 If the Licensee's Certification is suspended in accordance with the Certification Terms, then this Licence is also suspended and the Licensee must, during the suspension period, comply with any reasonable written directions issued by SRL in relation to use of the Certification Mark.

11. AFTER TERMINATION

11.1 On termination of this Licence, the Licensee:

- (a) must, subject to clause 11.1(b), immediately cease using and has no further right to use, including on or in materials:
 - (i) the Certification Mark; or
 - (ii) any certification mark that is substantially identical with or deceptively similar to the Certification Mark
- (b) may continue to sell goods marked with the Certification Mark before the termination of the Licence unless SRL directs that the Certification Mark be erased or masked from the goods before their sale; and
- (c) subject to clause 11.1(b), must remove the Certification Mark from, or destroy all materials bearing the Certification Mark in the Licensee's custody, possession or control; and
- (d) must promptly return the Certificate (including all copies) to SRL.

11.2 Termination of the Licence will not affect any accrued rights of any party, including any rights of appeal available to the Licensee.



11.3 Clause 6 and this clause 11 continues after termination of the Licence.

12. AUDIT REPORTS

12.1 At the completion of any Certification Audit of the Licensee:

- (a) SRL may request directly from the CAB a copy of the audit report prepared by the CAB in respect of the Certification and the Licensee consents to the CAB providing a copy of such audit report; or
- (b) if SRL requests, the Licensee must provide SRL with a copy of the audit report prepared by the CAB in respect of the Certification.

12.2 A confidential copy of audit reports provided to SRL under clause 12.1 will be kept on file to maintain a backup file copy of the reports that can be requested at any time by a category.

12.3 The Licensee acknowledges and agrees that SRL is authorized to use any copy of an audit report obtained under this clause 12 for any purpose it reasonably requires in relation to the Licensee's Certification or this Licence, including without limitation:

- (a) issuing a licence agreement in relation to the Certification Mark;
- (b) assisting in closing out audits for cost control;
- (c) providing feedback to the CAB;
- (d) assisting with continual improvement of the Clean Green Certification Scheme.

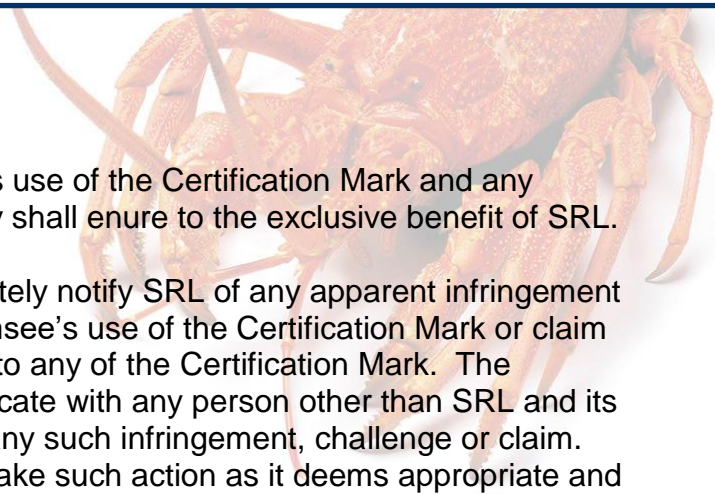
13. SUB-LICENSING AND ASSIGNMENT

13.1 The Licensee must not assign, otherwise transfer or sub-license the whole or part of the Licence or the rights granted under it without the prior written consent of SRL, which consent may be given or withheld at its absolute discretion and subject to any terms and conditions that SRL thinks fit.

13.2 SRL may assign its rights under the Licence at any time and in any manner it wishes.

14. RIGHTS IN CERTIFICATION MARK

14.1 The Licensee acknowledges that SRL owns all rights in the Certification Mark.



14.2 The Licensee agrees that its use of the Certification Mark and any goodwill established thereby shall enure to the exclusive benefit of SRL.

14.3 The Licensee shall immediately notify SRL of any apparent infringement of, or challenge to, the Licensee's use of the Certification Mark or claim by any person of any rights to any of the Certification Mark. The Licensee shall not communicate with any person other than SRL and its counsel in connection with any such infringement, challenge or claim. SRL shall have the right to take such action as it deems appropriate and the exclusive right to control any litigation or administrative proceeding arising out of any infringement of, or challenge or claim to, any of the Certification Mark or in any way related to the Certification Mark. Any damages or other benefits arising out of any such infringement, challenge or claim shall accrue exclusively to SRL.

15. GOVERNING LAW

15.1 This agreement is governed by the laws of South Australia.

15.2 The parties irrevocably submit to the non-exclusive jurisdiction of the courts of South Australia and the South Australian division of the Federal Court of Australia, and the courts of appeal from them.

15.3 No party may object to the jurisdiction of any of those courts on the ground that it is an inconvenient forum or that it does not have jurisdiction.

Schedule

Certification Mark

Australian
Southern Rocklobster



Southern RockLobster Limited

Terms and Conditions of Certification Mark Licence

Acknowledgement of acceptance

Organisation Name _____ Certification No

We acknowledge receipt of the above terms and conditions for the licence to use the Certification Mark. We agree to comply with, and accept a licence to use the Certification Mark in accordance with, these terms and conditions.

Name
(Authorised Company Representative)

Signature

Date