



Trial Quality Assurance Review

On behalf of the Commission for the Conservation of Southern Bluefin Tuna



Final Report on the Overall 2014 QAR Programme

Undertaken by Global Trust Certification Ltd.

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**Prepared for:
Commission for the Conservation of Southern
Bluefin Tuna (CCSBT)
81A Denison Street
Deakin
ACT
Australia
Tel: 612 6282 8396
Fax 612 6282 8407**

**Address:
Global Trust Certification
SAI Global Assurances
Marine Office
Quayside Business Park
Dundalk
Ireland
Tel: 00 353 42 9320912
Fax: 00 353 42 9386864**

Executive Summary

- The 2014 Quality Assurance Reviews were commissioned by the Commission for the Conservation of Southern Bluefin Tuna (CCSBT), with the objective of developing and testing an on-site audit application (Phase 2) to complement the existing desk review procedures undertaken in 2013 for measuring compliance against the Minimum Performance Requirements (MPR's) set out by CCSBT.
- This Report provides a summary and discussion of the feasibility of Phase 2 and also the outcomes of QAR's for Australia (Phase 2), Taiwan (Phase 1) and Indonesia (Phase 1 and 2). Individual QAR reports are also available for each Member which provide the full details of the performance of each Member management system against the MPRs.
- 2014 QARs were conducted according to the procedure developed in 2013 for Phase 1 reviews. 2014 QARs also extended this procedure to include on site audits (Phase 2) of the Member SBT management systems intended to provide thorough verification of the findings from QAR Phase 1.
- While individual Member reports provide more specific information on the outcomes of the QAR, this report deals with the overall outcome of the feasibility, including benefits of using this type of third party assessment, limitations of the procedure and recommendations for future QAR development activity.
- The Trial QAR methodology was developed using standard third-party audit processes to ensure reliability and consistency, consistent with applications commonly found in commercial/industry applications of ISO based certification systems. A description of the procedure is provided in Section 3.
- The third-party, ISO-based review approach increases the credibility and improves the reputation of the CCSBT. It can provide confidence to stakeholders, reliably identifies and aids the correction of any issues, and permits the tracking and publication of improvements to Member processes. These and other issues relating to the value of the QAR process to the CCSBT and Members are discussed in Section 5.
- Strengths and weaknesses of the Trial QAR procedure is discussed in more detail in Section 4 and a synopsis provided below.

Summary:

- The objective of designing a third-party, ISO-based review system is to create consistency and robustness in the review process. Both desk top and on-site procedures were developed with this purpose and to a large extent, proved effective at delivering objective based outcomes substantiated through on-site witnessing of systems and documentation.
- The process flow charts used to 'capture' the management processes for each Member were again very useful for developing understanding, structuring discussion and describing the components within each of the management systems used.
- The remote, desktop-based approach, combined with an on-site audit effective method of achieving a high level understanding of the level of compliance to CCSBT MPR's achieved by each member.
- Phase 1 and 2 QAR's should be considered two part steps in the audit process rather than 2 separate audits although, in the case of Australia, Phase 1 had been conducted the previous year. Whilst Taiwan was only a Phase 1 review, the review team did meet face to face with the management agencies, simply due to proximity to the agencies offices and supported by Taiwan's generous offer to accommodate the team.
- In the case of Indonesia, Phase 1 and 2 stages became merged due to delays in completing Phase 1 as a separate outcome. A gap analysis that compared outcomes of Phase 1 with Phase 2 was therefore not possible due to the open-endedness of Phase 1 section where in the case of Australia, a more direct comparison of Phase 1 and 2 could be made. Overall, both approaches can be acceptable, as the ultimate objective is performance of the Member systems overall and not a Phase 1 and Phase 2 comparison. However, for feasibility purposes the comparison would have been interesting. In the case of Australia, the gap analysis was undertaken.
- QAR's Member effectiveness can only be achieved with substantial documentary information. Where information is either not available or not accessible to the review team, management system effectiveness cannot be confirmed. Phase 2 was designed to support both the acquisition of documentary evidence and allow more direct audit of management processes, information collection, data review and

storage mechanisms. On site audits also allowed direct witnessing of operations such as SBT weighing and counting systems.

- CCSBT readers should note that statements in Phase 1 Reports are not substantiated to the same level as statements made in Phase 1 and 2 combined reports. Therefore, care should be taken if making direct comparisons with Phase 1 and Phase 1+2 combined reviews.
- Site visits allowed a wider consultation with components of the management system and also the fishery itself, which proved highly valuable in terms of providing physical verification of the operations supporting the implementation of management procedures designed to deliver MPR's.
- The fact that Taiwan (Phase 1) moved from a conference call to a physical meeting helped to avoid challenges with remote communication.
- All QAR's were conducted in the local language which was felt a strength in facilitating information exchange. Conversely, provisioning sufficient time for translation to English and challenges with interpretation should not be underestimated.
- Site audits require considerable planning and in turn substantial communication with management agencies for scheduling meetings and on-site visits. This can place constraints on management resources, particularly where management is relatively flat and relies on a limited number or even one member of the management system to coordinate meetings.
- Phase 1 and Phase 2 components of the audit can be undertaken separately or in combination. The reporting style may vary depending on the approach. The combined approach for Indonesia meant that evidence and outcomes for both Phase 1 and 2 were documented collectively for each MPR. In the case of Australia, Phase 2 was used as a verification of Phase 1 information as documented in the 2013 report and hence Phase 2 is an extension to the report.
- Further to the previous bullet point, both separate and combined approaches are viable although as a general recommendation, a combined phase 1 and 2 approach may be more cost effective in the long-term and provide timely and more final outcomes for Member reviews.

Acknowledgement

Global Trust/SAI Global Assurances would like to acknowledge and thank the Members that participated in the QAR for their support, contributions and provision of information that was necessary to undertake the review process. Also, we would like to thank the CCSBT for choosing Global Trust services.

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ABBREVIATIONS

AC	Allocated Catch (Individual Member quota)
ASBTC	Attributable Southern Bluefin Tuna Catch
CCSBT	Commission for the Conservation of Southern Bluefin Tuna
MPR	Minimum Performance Requirement
QAR	Quality Assurance Review
SBT	Southern Bluefin Tuna
TAC	Total Allowable Catch

1 Introduction

Between February and August 2014, Global Trust Certification Ltd conducted Quality Assurance Reviews (QAR) of three Member states of the Commission for the Conservation of Southern Bluefin Tuna (CCSBT). The three Members participating in the review were Australia, Taiwan and Indonesia.

The QAR aimed to demonstrate the feasibility of a combined desktop-based and on-site audit of the systems and supporting processes in place to ensure Members meet the obligations set out in CCSBT's Compliance Policy Guideline 1, "Minimum performance requirements to meet CCSBT obligations".

This Overall Trial Report aims to summarise the QAR process, analyse its effectiveness, (benefits and limitations) and provide recommendations for future QARs both of similar and broader scope. As per the original CCSBT specification requirements this report includes:

- A detailed description of the methodology developed for the QAR with sufficient detail to enable the QARs to be repeatable with other Members, or with the same Members but for different CCSBT obligations;
- A description of issues encountered during the trial (including benefits and limitations of the approach and methodology used in the trial) as a method for adoption by CCSBT and Members for future QARs
- Recommendations to CCSBT with respect to building on the credibility and international reputation of CCSBT as a responsible RFMO and for future QARs, including any improvements of the methodology with respect to building confidence among Members' with respect to their MCS systems(Section 6);
- Recommendations to CCSBT and Members on areas where improvement would be beneficial for improved consistency with the CCSBT minimum requirements reviewed (Appendix 1- also contained in detail in each review);
- A full developed procedure for Phase 2 QAR is presented (section 3) and Appendix 2 provides the Phase 1 procedure for completeness.

2 Phase 2 QAR methodology development

2.1 Feasibility and deviations from methodology

The QAR now includes two separate phases.

Phase 1 is an independent desk top review with remote consultation stages with Member authorities to gain further evidence, and seek clarification and verification. The review is evidence based, with the majority of information sourced directly from the governmental bodies responsible for SBT management. The 2013 feasibility project conducted for Phase 1 focused on Section 1.1 of the CCSBT Compliance Policy Guideline 1. For 2014 the QAR process was expanded to include additional MPRs. A detailed methodology for Phase 1 was described in the 2013 “Final Report on the Overall Trial”, but is also replicated in Annex (2) of this document for convenience.

Phase 2 of the QAR process is an on-site inspection of and consultation on the Member’s MCS systems and processes. The objective of Phase 2 is the independent verification of the existence and effectiveness of Members’ systems and processes, and to ensure the accuracy of the information collected during Phase 1. During Phase 2, the reviewer is expected to determine:

- Whether the documentation of systems and processes in Phase 1 is correct, and whether the documentation accurately reflects the systems and processes that are actually in place.
- Whether these systems and processes are effective to ensure that Members meet their obligations.
- Whether there is any possible further improvement of each Members compliance systems and processes, taking into account the results of the assessments listed above.

This section provides a detailed description of the methodology for Phase 2 reviews, with the objective of providing sufficient detail for any appointed independent review body to conduct QAR reviews to the same specification. Note that the methodology to be used for selecting a reviewing organisation and appointing review team members is covered in the Phase 1 methodology. However, an additional procedural item is added to Phase 2 designed to cover situations where Phase 1 and Phase 2 are conducted separately (temporally) and where different review teams are considered. Additional recommendations based on the experience gained during the 2014 QARs are identified and discussed in Section 5– “Recommendations for Future QARs”.

The methodology has been based upon standardized approaches used in third party conformity audit and certification programmes to international standards used for process and product assessment, such as *ISO 17065 ‘Conformity assessment - Requirements for bodies certifying products, processes and services’*.

CCSBT terms of reference provided the basis to the audit framework design. Key items that were considered:

- Ensuring that Phase 1 reviews (Taiwan and Indonesia) were conducted according to the Procedure developed in 2013; including consultation calls, process flow maps and requests for information. As noted, Taiwan Phase 1 also included a physical meeting as logistically, this was easy to undertake. A physical meeting is encouraged for Phase 1 reviews in place of or in combination of conference calls as this greatly facilitated the collection of information.
 - Up-dating Australia Phase 1 review with the additional MPR's and providing a framework for Phase 2 information to be documented and used to demonstrate if and to what extent it substantiated Phase 1 outcomes.
 - Designing a site visit plan for Phase 2 reviews based on the information collected in Phase 1
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- As per Phase 1 procedure, consultations (both conference call and physical meetings followed the following agenda;
 - Introductions and short PowerPoint presentation (outlining the project and the role of the review team)
 - Review of workflow diagram identifying associated questions as the consultation moved through the workflow diagram
 - Synopsis, action points, follow up and next steps, questions
 - Meeting close and thanks
 - Consultation summaries were circulated identifying the documents Members had agreed to provide.
 - Information obtained during the consultation was incorporated into the report.
 - Further contact was made with Members to request additional information where clarification was required.
 - Additional information received from the Member state was incorporated into the report.
 - A SWOT analysis was conducted based on the available information for each Member. The outcome of the analysis documented the strengths, weaknesses and risks identified by the review team in the management processes of each Member.
 - The SWOT analysis also produced recommendations for improvement, identifying areas through the review that may result in improved Member compliance (or improved reporting effectiveness for purposes of subsequent QAR activities).
 - Draft reports and Member Comment Templates were submitted to Members for review and comment.

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- However, in the case of Indonesia, delivery of a Phase 1 report was not undertaken as at that time, as insufficient information was available to make any firm conclusions on the outcome of Phase 1.
 - Instead, the Lead Reviewer consulted with the management agency on the main areas that were of most interest to establish greater understanding of the processes in place and highlight information that was required for review and collect during the Phase 2 site visit.
 - Reports and completed templates were returned to the review team by Taiwan and comments were considered and responded to, and where appropriate, very minor changes were made to the report in order to clarify key aspects and where the Review Team were in agreement with the change.

Phase 2

- Phase 2 site visits were scoped, scheduled and confirmed by the lead reviewer in consultation with the project manager. Considerable contact with management and fishery participants was undertaken in the case of Australia in order to schedule audits of both the operational practices of SBT counting, weighing and transfer and audits of the central office management systems and staff.
- Phase 2 site visit scheduling for Indonesia was delayed due to availability of management staff although once scheduled a substantial meeting did proceed at the central management office where relevant staff were available to the review team. The consultation covered the full scope of the MPR's under review. However, more direct physical inspection of management practice was not undertaken. Several recommendations are made for improving the circumstances of the site visit audit in Section 6 'Recommendations'.
- Post the site audits, the information was used to up-date Phase 1 reports (additional MPR's) and provides the gap analysis of outcomes in the case of Australia. A full description of the site visit is also presented in the QAR.
- In the Indonesian case, a gap analysis was not undertaken and outcome summaries of each MPR criteria are a result of both Phase 1 and Phase 2 components of the audit combined.
- Interim reports for Member review were sent according to ToR and procedure in the case of Australia and Taiwan.
- However, in the case of Indonesia, a report of Phases 1 and 2 was not sent until the end of July since the site audit did not take place until June 11th. Indonesia facilitated an expedited response in early August which required further consultation and internal discussion and a draft report was available. That draft contained significant up-dates to the outcomes of the MPR and was completed in English. At this time (October 1st) the report was undergoing translation so that it could be submitted to Indonesia as the final QAR of Phase 1 and 2 combined.

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- Additionally to this, where Indonesia wishes to provide further evidence, SAI Global/Global Trust will incorporate this additional information into an up-dated version of the QAR prior to the end of 2014.
 - Final QAR reports for Australia and Taiwan were sent according to the terms of reference for Australia and Taiwan on August 31st 2014.

3 Phase 2 QAR Procedure (Version 1.0).

3.1 Scope

This methodology description sets out the detailed procedure that an independent Assessment Body shall follow in order to conduct a Phase 2 Quality Assurance Review (QAR) of a Member or Cooperating Non-Member (CNM) of the Commission for the Conservation of Southern Bluefin Tuna (CCSBT) against selected Minimum Performance Requirements (MPRs) set out under Obligations of the CCSBT Compliance Policy Guideline 1.

A Phase 2 QAR can be undertaken either after a Phase 1 QAR has been completed or in combination, where a Member/CNM is assessed to both a Phase 1 and 2 QAR, concurrently.

For the purposes of document control, this current procedure can be referred to as QAR Phase 2 Procedure Version 1.0. A separate procedure was developed during Phase 1 QAR's. This is referred to As QAR Phase 1 Procedure Version 1.0. (Refer to Appendix).

3.2 Review Team

Review team members shall be appointed under the same conditions as Phase 1. (Refer to QAR Phase 1 Procedure Version 1.0). Where members of the review team are different from Phase 1, the Assessment Body shall ensure that Phase 2 members are thoroughly briefed on the outcome of Phase 1 QAR's and shall perform checks to ensure that the lead reviewer has fully incorporated the outcomes of Phase 1 into the scope and application of the site visit audit in Phase 2.

In particular, scope of the Phase 2 QAR shall include audit applications that focus on the Member Status as identified by CCSBT Terms of Reference.

From the Terms of Reference:

'In assessing the suitability of systems QARs will take into account the particular circumstances and characteristics of each Member being reviewed. QARs will also take into account any issues identified by the Compliance Committee. All QARs will provide an overall review of the Members monitoring, control and surveillance (MCS) systems however some areas may need particular attention based on the Members involved, including:

- i) **Market States** – emphasis will be placed on the systems and processes in place to support requirements for the importation of SBT products;*
- ii) **Farm States** – emphasis will be placed on the systems and processes required for accurate reporting of catch, monitoring the introduction of SBT into farms including the effectiveness of the 100 fish sampling methodology and the harvesting of farmed SBT product;*
- iii) **Developing States** – emphasis will be placed on the systems and processes in place required to monitor, manage and accurately report artisanal and industrial catch including to address Indonesia's request for consideration of its allocation; and*

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- iv) ***Distant Water Fishing States*** – emphasis will be placed on the systems and processes in place for the accurate reporting of catch, recording/verifying of landing and/or transshipment and monitoring of direct exports of SBT.

Confirmation that the review team is sufficiently fluent in spoken and written language of both the Member and in English language. All correspondence with management agency staff and the site visit shall be conducted in the local language.

3.3 Phase 2 Review Process

Phase 2 of the QAR review process follows this series of steps:

- Review of the outcomes of Phase 1 (or QAR to date) and identification of essential and important areas to include in the site visit audit.
- Full briefing of the Review Team and appointment of the Lead Reviewer and support Reviewer.
- Development of a site visit, interview and testing plan based on the outcomes of Phase 1.
- A visit to the principal site(s) where the Member's main systems and processes are located, during which reviewers will:
 - Interview the key people involved in the operation of these systems and processes, and
 - review documentation including official records, reports and associated evidence
 - examine and witness key operations either related to data management systems or operational practices (at sea or shore) that demonstrates the level of operational effectiveness of systems and processes designed to deliver the requirements of the CCSBT MPR's.
 - Ensuring sufficient recording of the meeting by way of comprehensive notes are taken.

After the site visit, the evidence obtained will be used as appropriate for:

- Confirmation of MPR performance outcomes and where necessary, modification of the process map and SWOT analysis obtained from Phase 1 (where Phase 1 and 2 were undertaken at separate times).
- Production of a gap analysis between Phase 1 and Phase 2 findings (where Phase 1 and 2 were undertaken at separate times).
- Development of recommendations for the overall Member QAR and preparation of a complete report according to the report template.

In addition to the specific actions listed above, the Project Lead Reviewer will provide support and guidance to all Reviewers throughout the review process as necessary. The Assessment Body QAR manager shall also ensure QAR reports meet the requirements laid

out in the Review Plan, and to ensure Reviewers complete their duties in accordance with the requirements of this procedure and within the timeframe allocated.

3.4 Review Plan and Audit Schedules

The Review Plan shall be prepared by the Project Lead Reviewer alongside discussion with the appointed Review Team and where appropriate confirm details of the plan with CCSBT.

The site visit review plan shall identify the entities and key personnel within the management system that are to be included in the site audit. The scope should be broad enough to provide sufficient confidence to the review team of it succeeding in terms of evidence collection for QAR verification. Scope shall consider the specific status of the Member State and ensure that specific areas of management unique to this status are included in the audit.

Where the scope of the site visit extends beyond the agencies directly responsible for SBT management, the Lead Reviewer shall contact the principal management agency and inform them of the desire to extend the audit to include the additional areas. (Any provisions or discussions on reasons for the audit scope can be held prior to the visit).

Additional entities for inclusion in the site visit may include fishing associations, shore base operational activities, at sea operational activities, regional inspection or management agencies where their responsibilities are over segments of the fleet that encounter SBT.

A site visit plan shall be organized and used to schedule the various dates and site visit meetings. The schedule shall be the responsibility of the Lead Reviewer and confirmed in consultation with the Assessment Body manager.

The primary objective of the Review Plan is to finalise the following components of the review process:

- Agree the site visit requirements and plan the site visit, including:
 - Dates*, times and locations for site visits.
 - Management Organisations, key staff and any other associated agencies that are to be included in the audit.
 - Specific areas of audit and consultation based on the outcomes of Phase 1 or the review to-date.
- Agree and plan the roles and activities of individual Reviewers.
- Agree and plan the timelines and schedule for the review, including the submission of draft QAR reports for Member review, the submission of Member comments to the Assessment Body, and the submission of the completed QAR reports to the CCSBT. (N.B These dates may be pre-determined by the CCSBT).

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- *Dates for site visits should take into account requirements to witness certain activities associated with the scope of the audit that may be of a seasonal nature. Where site visits require time at sea, the Review Lead should consider factoring sufficient time to account for inclement weather.

3.5 Audit Testing Plan for each Entity included in the Site Visit

A testing plan shall be developed for each entity included in the site visit including a list of questions or key areas for auditing. At its simplest, it may be an agenda for each meeting or more elaborate planning for at sea observations, lists of documents to be collected and reviewed. An outline schedule for each meeting with key agenda items shall be provided to each of the entities at least one week in advance of each meeting/consultation.

3.6 Site Visit Review Team

The site visit shall be conducted by two members of the review team; including the Lead Reviewer. As stated, both members shall be sufficiently fluent in the local language and where this is not the case, the review team leader and Assessment Body manager shall consider and provision for any special requirements to ensure that the site visit is effective (e.g. use of a local support translator).

3.6.1 Interviews and Consultation

Interviews can be held with individuals or with groups and can take the form of a consultation meeting. Questions should be structured in a logical flow and shall be objective and open in nature (i.e. requiring more than simple yes/no responses).

At all opportunity, the review team shall seek objective, documentary evidence and witness activities that substantiate the existence and effective implementation of systems. Consultations shall commence with an introduction and short presentation of the aims of the QAR and expectations of the meeting.

The outcome or close of meetings shall summarize any evidence reviewed and also any evidence that the auditee has offered to provide electronically post the meeting. The support reviewer shall take detailed notes / minutes of the meeting and also record the names, titles and contact details of those present. The meeting notes/minutes shall serve an accurate presentation of the meeting.

3.7 Post Audit Reporting

Information collected from the site visit shall be incorporated into the QAR template.

Generally, this will include:

- A summary table of the site visit schedule and the entities, including names of representatives met.
- Up-dates to each MPR with information and verification of the extent to which the Member meets each MPR.
- Up-dates and confirmation of the accuracy and completeness of the Member management system flow chart.
- A list of all documentary evidence and specimen forms collected.
- Additional and miscellaneous evidence including photographs of site visits
- A summary of the audit findings, strengths, weaknesses/threats and recommendations

The report shall be developed in the local language, although the review team and Assessment Body manager may consider an alternative approach such as developing the report in English followed by translation or simultaneous development of the report.

The rationale to the language for report development shall be based on achieving timely communication with the Member and ensuring the report is accurate and consistent across both languages.

3.8.1 Gap Analysis

Where Phase 1 and Phase 2 reviews were undertaken at distinctly different times (i.e. 1 year apart), a gap analysis using Phase 2 evidence outcomes shall be undertaken to verify the information and outcomes already documented in the previous Phase 1 review. *(For the purposes of feasibility, this was conducted during the Australian Member Phase 2 review).*

3.9 Peer Review of QAR report

The Assessment Body shall arrange for each QAR Report to be reviewed by a Peer Reviewer considered to be competent in the relevant aspects of fishery management. As a minimum, the Peer Reviewer shall satisfy the key requirements of "Review Team Appointment" described in Phase 1 methodology as they relate to the Member under review. The same procedural requirements for appointment, declaration of no conflict of interest, and confidentiality shall be followed for Peer Reviewer appointment.

An individual Peer Reviewer may be used to review any number of QAR reports.

The Assessment Body shall agree the timeframe for delivery of Peer Reviewed QARs.

Upon receipt of the Peer Reviewer written comments the Review Team shall consider each and every comment raised and make amendments to the QAR as deemed necessary.

This may result in:

- Incorporation of changes into the QAR Report based on comments, new information or clarification provided during the Member review.
- No further changes to the Report based on the Review team's objective opinion.

(N.B The Review Team is not obliged to make amendments but are required to review all Peer Reviewer comments and decide on the course of action).

Peer Review reports shall be retained and made available to CCSBT and individual Members.

3.10 QAR Report Completion and Submission

The main outcome of the QAR shall be the production of a final QAR Report for each Member/CNM. The Report shall be based on the QAR Template, and shall be completed by the Country Lead Reviewer with the assistance of the Support Reviewer and Assessment Body manager. All sections of the report should be fully referenced whenever appropriate. As previously described, where English is not the first language of the Member, the QAR shall be written in both the local and English language. Final QAR Reports shall be submitted within the timeframe identified in the Terms of Reference of the CCSBT or as otherwise agreed.

4 Strengths and Weaknesses of the QAR Phase 2

The Phase 2 feasibility revealed both strengths and weaknesses or limitations in the current approach which are felt resolvable through procedural improvements to the QAR methodology.

Strengths of the QAR Phase 2

The strengths of Phase 2 QAR are described:

- As stated in the Phase 1 Report Summary of 2013, a third party, independent audit approach to reviewing Member compliance to QAR's is considered a proficient and effective way that Members of CCSBT can demonstrate compliance to the MPR's.
- Additionally, a standardized approach and report creates impartial and readily comparable outcomes (for same Phase reviews). Using third parties also eliminates potential bias which may be introduced by internal reviews.
- Developing and adopting a defined procedure will ensure consistency and aid comparability both across reports (from Member to Member) and over time for the same Member. Since the QAR's are repeatable, CCSBT and its Members can readily chart progress and improvements in performance over time. This may be important for Developing status Members who may have a stronger desire to both measure and objectively, demonstrate performance improvements of the entire management system over time or Members which are actively improving key areas of their systems and wish to have specific MPR's assessed.
- 2014 QAR's were conducted and documented in the local language which demonstrates the feasibility of this approach. It is important to ensure consistency of translation where dual reports are created and hence, ensuring that the procedure defines the language capability of the Review Team will support this.
- On-site audit is an accepted and reliable practice used for third party verification of systems and processes across all commercial business. It is also becoming a growing feature in non-commercial, government applications. Using on-site audit as a tool to support the Members of CCSBT to demonstrate their performance against MPR's is considered a strength to the existing Phase 1 desk top review procedure. On-site audits provide a far greater level of confirmation of the operational capability and consistency of application of systems and processes. Ultimately, the addition of on-site audits as described by Phase 2 to complement Phase 1 QAR's can provide a far higher level of confidence to Members, CCSBT and their stakeholders.

Weaknesses (and Limitations/Risks Encountered)

There were a number of weaknesses and limitations encountered during the feasibility testing.

- The feasibility trial identified an anomaly in the original plan to undertake a gap analysis for all Members included in the review. However, as a Phase 1 was not formally completed for Indonesia due to the more open-ended nature of moving to Phase 2, it was not possible to directly compare Phase 1 outcomes with those of Phase 2. However, it was still possible to use Phase 2 to confirm or dispel the initial considerations on Phase 1 outcomes held by the team.
- The feasibility identified a possible weakness which may result from separate Phase 1 and Phase 2 QAR's. The Phase 1 Review Team members may not be available at the time that Phase 2 is conducted. This is not an exceptional situation in third party auditing and is handled by adopting sufficient procedures to manage the transfer and maintain consistency. This has been developed in the Procedure for Phase 2 in order to eliminate any risks of loss in information/knowledge where separate review teams are appointed. In the case of Australia, the Lead Reviewer was not the same as in Phase 1 but was a member of the overall review team for QAR's in Phase 1's of 2013. Additionally, the original Phase 1 reviewer became the Peer Reviewer for Phase 2 to again, reduce risks of loss of knowledge.
- The feasibility revealed that sufficient briefing to Members from the outset is essential to developing understanding on how 'on-site audits' are undertaken. It is important that Members fully grasp the need to respond to questions with ample documentary evidence. Future QAR's should predict this well in advance and provide further briefing to Members as required. (Refer to recommendations also).
- Under the current Terms of Reference, the scope of an audit is described (among other terms): *'The reviews will be focused on government systems and processes, and will not involve reviews of any industry systems **nor consultation with a Member's industry, except at the discretion of the Member.** Consultation is to take place with nominated government officials and if applicable **government-authorized third party service providers** involved in the management of SBT.* CCSBT may wish to consider extending the scope of entities to be included in the review as verification of the effectiveness of systems and processes may be improved with direct consultation with industry associations and other parties. In the case of Indonesia, there was a need to clarify to what extent the Tuna Associations are government-

authorised third party service providers and by the time this was more or less confirmed, the audit had been completed. There was another instance, where the extent of the activities of provincial government in the management process were not fully understood until late in the overall QAR development negated more direct contact.

- The feasibility revealed that sufficient time to translate reports, either from local language to English or vice versa cannot be underestimated. The language skill of the review team has been included in the procedure for Phase 2.

5 Recommendations for Future QAR Development

As noted, Phase 2 on-site audit procedure provided additional robustness to the QAR.

The following recommendations for future QARs are based on the outcomes of the QAR processes conducted in 2014

- There is consideration for combining Phase 1 and 2 into one seamless QAR Procedure which always includes an on-site audit/inspection component. The value of the on-site audit cannot be underestimated. It is a standard and expected practice in third party verification systems. If QAR up-dates were envisaged by CCSBT, an option could be to undertake a Phase 1 and 2 combined audit initially, followed by Phase 1 audits in subsequent years. Depending on outcomes of Member QAR's, a Phase 2 audit could be carried out every third or fourth year to verify performance of management systems, most particularly, for developing and newly established systems. Again, this approach can be found in existing audit applications, including those used in third party fishery certifications.
- The Phase 2 QAR Terms of Reference identifies a facilitator for each Member. This is important to have a conduit for channelling communication and allowing decisions to be made for site visit planning and for correspondence on documentary information and feedback form draft QAR's. It may be also worth considering further support to each Member on the how Phase 2 audits are conducted and on their purpose. Prior to each Phase 2 audit, Global Trust provided basic briefing information on the objectives and purpose of the on-site audit. Additional briefing from CCSBT may prove beneficial and this could include a copy of the QAR Procedure in order that the formality of the Phase 2 audit can be conveyed. Members can sufficiently prepare and understand the expectations of the on-site audit team, most particularly relating to documentary information and the need to 'witness' operations taking place wherever possible.
- Further to the above point and noted as a potential weakness. It may be necessary for the Review Team to extend the audit outside of the central and even supporting management agencies to include fishing associations, buyers/processors/exporters (to confirm tag traceability). The initial briefing could request that Members provide a list of potential areas outside of the main management system that should be considered by the Review Team. Additionally, where the Review Team deems it necessary to undertake additional audits or consultations with external entities, there is a pre-defined procedure that allows this to proceed in a timely manner.

- The outcome of performance of Members for each MPR is currently described in summary within the main body of each report. The Executive Summary describes the overall performance of the Member and the SWOT provides more details on the specifics relating to individual MPR's. This does provide individual Members are detailed report on performance and on the areas where review teams feel that improvements can be made. However, this approach may be limited with respect to tracking performance over time of each Member (if this is a consideration) and makes cross comparisons more difficult (again, if a consideration). A simple scoring or rating system for each MPR could be created and Global Trust feels that, based on the inclusion of Phase 2 in the QAR's, there is more certainty in the outcomes that would allow this to be developed. A straight-forward 'High', 'Medium' and 'Low' rating system could be developed. Alongside this, guidance for how these are assigned would be necessary and consideration of guidance specific to each MPR's. In this way, 'a picture' of what is expected for each MPR would be developed. These type of scoring systems are used in other verification systems and including for fisheries (e.g. Marine Stewardship Council Sustainable Fishing Standard, International Fishmeal and Oil Responsible Sourcing Standard).

Appendix 1: Procedure for Phase 1 Quality Assurance Reviews

(The following Phase 1 methodology is taken directly from 2013 “Final Report on the Overall Trial”).

1. Summary

The QAR is an independent desk top review with remote consultation stages with Member authorities to gain further evidence, and seek clarification and verification. The review can examine the performance of Member and Cooperating Non-Member (CNM) fishery management processes and procedures against the CCSBT Minimum Performance Requirements. In this feasibility project, the review focused on Section 1.1 of the CCSBT Compliance Policy Guideline 1, but the following methodology is readily adaptable for any and all Sections of the Compliance Policy Guideline as required. The review is evidence based, with the majority of information sourced directly from the governmental bodies responsible for SBT management.

This section provides a detailed description of the methodology, based on the QAR trial undertaken, which could be adopted by any appointed independent review body conducting QAR reviews to the same specification as the trial. Additional recommendations based on the experience gained during the trial are identified and discussed in Section 5 – Recommendations.

The methodology has been written using the standardized terminology used in third party conformity audit and certification programmes to international standards used for process and product assessment, such as ISO 17065 ‘Conformity assessment - Requirements for bodies certifying products, processes and services’.

A flow diagram summarising the final QAR methodology is provided at Figure 1.

2. Purpose and Scope

This methodology description sets out the detailed procedure that an independent review body shall follow in order to review a Member or Cooperating Non-Member (CNM) of the Commission for the Conservation of Southern Bluefin Tuna (CCSBT) against the Minimum Performance Requirements (MPRs) set out under Obligations of the CCSBT Compliance Policy Guideline 1.

The review process is also referred to as the CCSBT Quality Assurance Review (QAR). For the purposes of document control, this current procedure can be referred to as QAR Methodology Version 1.0.

3. Qualification Criteria for Reviewing Organizations

The current CCSBT QAR is not a registered third party accredited programme but utilizes third party assessment procedures such that it is consistent with the norms and practices of third party, independent certification. For this reason, the reviewing organization must be a formally recognized Assessment Body having achieved ISO 17065 accreditation of its operating systems for third party assessment of products, processes and services. As such, all third party review organizations must be able to demonstrate that:

- They carry formal ISO 17065 accreditation for programmes third party certification services they offer
- They are able to demonstrate that they operate sufficient levels of governance and oversight within their Board and Management structure that allows for independence, impartiality and credibility in the field of assessment application
- They are able to demonstrate that they possess sufficient knowledge and competence to undertake evaluation of fisheries to the required standards of CCSBT.
 - In fulfilling the final requirement, a track record in third party fishery assessment, audit and certification to an ISO 17065 accredited standard will form the basis of demonstration of competence.

4. Templates and References

The following CCSBT document provides the basis of the scope of Member review by specifying the nature and extent of the MPRs agreed upon for each Member and CNM:

- Minimum Performance Requirements to meet CCSBT Obligations – Compliance Policy Guideline 1

To facilitate an effective assessment process the following templates are available (further templates would be developed as the review extends to include additional Minimum Performance Requirements within the CCSBT Member Obligations):

- CCSBT QAR template, Version 1.2, August 2013 (hereafter referred to as the QAR template).
- CCSBT QAR Member Review Template Version 1.0, August 2013.

5. Appointment of Reviewers

Identification of Members and CNMs

The Assessment Body shall be directed by CCSBT on the specific Members and CNMs to be subject to the review process. The Assessment Body shall also liaise with CCSBT to determine any additional requirements, such as the language(s) of consultation meetings, written communications and final QAR reports.

Appointment of Review Team by the Review Organization

The Review Organization shall appoint a Review Team with expertise in appropriate disciplines and with sufficient collective experience to review the fishery against the QAR template and in accordance with this QAR Methodology.

The Review Team shall include a Project Lead Reviewer who shall be responsible for the completion of the review in accordance with this procedure, report specifications and any additional requirements agreed with CCSBT

Candidates for the Review Team must meet have demonstrated technical expertise in one or more of the following fields:

- Fishery management and operations - must have experience as a practicing fishery/aquatic natural resource manager and/or fishery/aquatic natural resource management analyst or professional in some other related capacity.
- Current knowledge of the Member or CNM country, language and local fishery context that is sufficient to support meaningful assessment of the fishery.
- Third-party product and management system conformity assessment auditing techniques – must have experience and relevant qualifications as lead auditor. At least one member of the review team must be an ISO lead auditor (International Register of Certificated Auditors).

The Assessment Body shall ensure that the combined expertise of the appointed team is sufficient to enable a full and accurate review of each applicant Member and CNM to be conducted.

Independence, Impartiality and Confidential Arrangements of Reviewers

Individual reviewers must be independent from the management system and associated fishery. There must be a minimum of 2 years since any prior direct involvement in a work related capacity (working for or consulting for) with the Member CNM taking part in the review. Chosen reviewers must declare any potential conflict of interest and must agree to the confidential arrangement of the QAR through a signed declaration.

Review Team Verification

It is the responsibility of the Reviewing Organization to ensure the designated Review Team members achieve the minimum acceptable criteria as laid out in section 4.1 of this document.

The appointment of the Review Team shall be confirmed to the CCSBT.

Reviewers will be appointed on the basis of the following broad criteria:

- Project Lead Reviewer (familiar with the Review Procedures)
- One Country Lead Reviewer per Member or CNM
- One Support Reviewer per Member or CNM

(Recommendation) Where any component of the review (e.g. consultation meetings, final report) is to be conducted in a language other than English, both the Lead and Support reviewers should be sufficiently fluent in that language to carry out the review.

Individual reviewers may hold more than one Country Lead or Support position, but it is the responsibility of the Review Organization and Lead Reviewer to ensure these individuals can complete the required amount of work within agreed timescales.

Reviewers will be briefed on the basis of their specific role in the review plan. There will be a requirement for training and confirmation of all appointed Reviewers in the CCSBT QAR procedure, including the following:

- Overview of the CCSBT QAR procedure
- Understanding of the CCSBT MPRs, and the specific MPRs relevant to the QAR process.
- Familiarization with the QAR template used for review purposes including examination of previous reports
- Overview and understanding of roles and responsibilities for carrying out the assessment

Normally the Project Lead Reviewer shall conduct the necessary training and briefing of Reviewers, otherwise this will be carried out by a member of the Review Organization.

The Review Team will receive copies of the following documents:

- Minimum Performance Requirements to meet CCSBT Obligations – Compliance Policy Guideline 1
- QAR template (the current Version)
- Examples of previous QAR reports, including any conducted on the Member or CNM under review
- Recent, relevant CCSBT documentation produced by the Member or CNM, including the Compliance Action Plan and Annual Review of SBT fisheries.
- Training materials (PowerPoint presentation)

6. Review Plan

The Review Plan shall be prepared by the Project Lead Reviewer alongside discussion with the appointed Review Team and confirm details of the plan with CCSBT. The primary objective of the Review Plan is to finalise the following components of the review process:

- Agree and plan the desktop review requirements
- Agree and plan the Member consultation personnel for correspondence purposes
- Agree and plan the roles and activities of individual Reviewers

- Agree and plan the timelines and schedule for the review, including; Member information exchange, conference calls, deadlines for the responses of Members to information requests, the submission of draft QAR reports for Member review, the submission of Member comments to the Assessment Body, and the submission of the completed QAR reports to the CCSBT.

7. Review Process

The main body of the review process follows this series of steps:

- Initial contact with Member or CNM fishery management bodies, identification of key individuals and collection of core information sources
- Desktop review of core information sources against MPRs
- Consultation conference call(s) with fishery management bodies
- Further communication with fishery management bodies on an ad hoc basis
- Final QAR report, including SWOT analysis
- Submission to Member for review
- (Recommendation) Submission for peer review
- Final adjustments and submission of final QAR Report

In addition to the specific actions listed below, the Project Lead Reviewer will provide support and guidance to all Country Lead Reviewers and Support Reviewers throughout the review process as necessary. The Project Lead Reviewer shall also ensure QAR reports meet the requirements laid out in the Review Plan, and to ensure Reviewers complete their duties in accordance with the requirements of this procedure.

8. Initial contact with Member or CNM fishery management bodies, identification of key individuals and collection of core information sources

The Project Lead Reviewer shall identify, with direction from CCSBT, the key governmental management bodies and personnel within the Member or CNM state and make initial contact. The objectives of this initial contact are as follows:

- Outline the purpose and process of the QAR review
- Identify the full range of key personnel relevant to conducting the QAR, particularly those who should be present during the consultation conference call(s)
- Obtain any general information on the SBT fishery not already provided by the CCSBT
- Agree upon the timing of the consultation conference call(s)
- Discuss any other aspects of the QAR process as required

The Project Lead Reviewer and Member/CNM may also find it useful to agree an individual to use as a 'point of contact' throughout the review process.

9. Desktop review of core information sources against MPRs

The initial desktop review and analysis of fishery and fishery related information shall be conducted by the Country Lead Reviewer. The Support Reviewer shall offer support as necessary, and specifically with reviewing initial drafts and supporting potential lines of enquiry for consultation. The review will take place against the specific CCSBT MPRs defined by the CCSBT prior to the outset of the QAR. The objectives of the initial desktop review are as follows:

- Obtain a foundation understanding of the management processes and procedures in place in the SBT fishery under review
- Identify key additional information to be requested before or during the consultation conference call(s)
- Identify key areas requiring additional explanation during the consultation conference call(s)
- Identify key evidence to be requested before or during the consultation conference call(s), including catch reporting forms, observer data collection forms, licencing and auditing forms and any other relevant paperwork
- Produce an initial draft of the QAR Report using the QAR template, including fishery background, systems flow chart and summary of the currently available evidence

Key objectives required by the CCSBT in QAR reviews should also be addressed during the desktop review:

- The extent that Member supporting systems and processes are in place and are fit for purpose for ensuring compliance with national allocations of the SBT TAC
- To what extent the systems meet CCSBT MPR obligations under review
- The extent of any proposed improvements expressed by the Member are planned, underway or completed
- The extent that corrective actions or preventative measures have been taken in response to compliance monitoring

A copy of the QAR Template will be provided to each Reviewer in order to document the initial review in a consistent manner. The contents of the template are described in more detail below. At the initial desktop review stage, the template should be completed as thoroughly as possible given the initially available information.

The initial desktop review shall be primarily based on information provided by the CCSBT and the Member or CNM. Reviewers may also conduct additional research to uncover publicly available information sources where required.

10. Consultation conference call(s) with fishery management bodies

The additional information requirements, key areas requiring further explanation, and key additional evidence required, as identified above, shall be used to produce a series of points for discussion during the consultation conference call(s).

This list shall be provided to the Member or CNM governmental organisations in advance of the consultation conference call, along with a copy of the draft flow chart. The Country Lead Reviewer shall also produce an agenda and circulate in advance of the call. This information shall be provided to the Member sufficiently in advance of the consultation conference call to enable time to prepare (not less than 1 week prior to the call).

The consultation conference call(s) shall be conducted by the Country Lead Reviewer. The Support Reviewer shall act as secretariat for the call, taking minutes and recording outcomes as appropriate. The call shall be structured in whatever way the Country Lead Reviewer feels appropriate to best obtain the required information and achieve the objectives listed below.

The Member should ensure attendance of key personnel based on the outcomes of the initial contact discussion, and the list of key discussion points provided before the call.

The key objectives of the consultation conference call(s) are as follows:

- Discuss information gaps and areas requiring additional information as identified during the initial desktop review or during the call itself
- Ensure the accuracy of the Review Team's current understanding of the fishery management processes and procedures, including the draft flow chart and any other information provided to the Member in advance of the call
- Request additional information sources or evidence as identified during the initial desktop review or during the call itself

Where these objectives cannot be completed during a single call, where not all relevant personnel can be present during a single call, or where additional time is needed for any other reason, additional conference calls may be scheduled at the discretion of the Review Team and Member/CNM organisations.

Within a week of the final consultation conference call the Country Lead Reviewer and Support Reviewer shall produce a summary of the outcomes of the call(s), including any actions agreed to be carried out by the Member/CNM. These may include provision of further information or evidence, and answering of questions which could not be answered during the call for any reason.

11. Further communication with fishery management bodies on an ad hoc basis

Email communication between the Country Lead Reviewer and Member/CNM government organisations shall continue as necessary to ensure the following:

- Any actions agreed upon during the consultation conference call are completed
- Any additional questions, requests for clarification and requests for evidence are answered to the extent possible given review timescales

12. Consultation outside of the Member Management bodies

The terms of reference for the QAR process do NOT allow for consultation with non-governmental SBT fishery stakeholders . There shall be no consultation with fishery participants, their associations or other stakeholders or interested bodies or persons. Where there is uncertainty as to the role of a body and the prospect of consultation, the Review Team must refer to CCSBT for direction.

13. Final QAR report SWOT analysis

The QAR report shall be continually updated, expanded and corrected as new information is obtained by the Review Team. The SWOT analysis requires a full and accurate understanding of the fishery management processes and procedures, and shall only be conducted once all relevant information has been obtained or at a point where further information is not available.

The Country Lead Reviewer shall draft the final QAR report and conduct the SWOT analysis in consultation with the rest of the Review Team.

The SWOT – Strengths, Weaknesses, Opportunities and Threats – shall be undertaken on the basis of information presented and analysed during the review. Undocumented information provided during the consultation can be considered by the Review Team and used in support of documented evidence. The extent to which undocumented information is used shall be at the discretion of the Lead Reviewer and, where necessary, the report should indicate the outcome of its use with respect to the SWOT analysis.

Definitions and Guidance for SWOT analysis:

Strengths – areas where the Review Team determine there is strong substantiated and documented evidence suggesting a high probability of conformity to an MPR clause.

Weaknesses – areas where the Review Team determine that the evidence presented some risk of non-conformity to an MPR clause.

Opportunities – determined as Recommendations by QAR procedure. Areas of potential improvement to the Member/CNM Management System which could reduce the risk of non-compliance against a specific or a number of MPR clauses.

Threats – areas that may present a risk to non-compliance of the Member System to their CCSBT obligations under Compliance Policy Guideline 1 and MPR included in the QAR. N.B Threats are considered a risk outcome or consequence of areas that are identified as weaknesses during the SWOT analysis.

14. Member Report Review

The Project Lead Reviewer shall submit a draft of the QAR Report in PDF format to the Member/CNM for review and comment within the timeline agreed.

The Project Lead Reviewer shall also provide the Member Review Template to formalise the format of the Member/CNM comments along with any additional instructions and, importantly, the deadline for returning comments to the Lead Reviewer by the Member/CNM.

Where Templates and additional written comments are not returned by the Member/CNM within the timeframe, the Lead Reviewer shall notify the Member/CNM of the consequences with regards to the final reporting deadline to the CCSBT. Under such circumstances, additional time for Member responses may be agreed with CCSBT.

Upon receipt of the Member/CNM's written comments the Review Team shall consider each and every comment and issue raised and make a formal response within the Report Template.

This may result in:

- Incorporation of changes into the QAR Report based on comments, new information or clarification provided during the Member review. The Peer Review Reports and Review Team response to the Peer Review comments shall be documented in the final QAR Report.
- (Recommendation) No further changes to the Report based on the Review team's objective opinion. Where no changes are made to the Report, the Review Team shall substantiate the basis that this decision is taken within the Report such as other parties (Member and CCSBT) can clearly identify the basis of this outcome.

15. (Recommendation) Peer Review of Member QAR

The Assessment Body shall arrange for each QAR Report to be reviewed by a Peer Reviewer considered to be competent in relevant aspects of fishery resource research and management. As a minimum, the Peer Reviewer shall satisfy the key requirements of "Review Team Appointment" above, particularly as they relate to the Member under

review. The same procedural requirements for appointment, declaration of no conflict of interest, and confidentiality shall be followed for Peer Reviewer appointment.

An individual Peer Reviewer may be used to review any number of QAR reports.

The Assessment Body shall notify the CCSBT of the proposed Peer Reviewer(s).

The Assessment Body shall agree with the Peer Reviewers a timeframe for the peer review process and submission of feedback from the Peer Reviewers.

Upon receipt of the Peer Reviewer written comments the Review Team shall consider each and every comment and issue raised and make a formal response within the Report Template.

This may result in:

- Incorporation of changes into the QAR Report based on comments, new information or clarification provided during the Member review. The Peer Review Reports and Review Team response to the Peer Review comments shall be documented in the final QAR Report.
- No further changes to the Report based on the Review team's objective opinion. Where no changes are made to the Report, the Review Team shall substantiate the basis that this decision is taken within the Report such as other parties (Member and CCSBT) can clearly identify the basis of this outcome.

Peer Review reports shall be retained and made available to CCSBT and individual Members.

16. QAR Report Completion

The main outcome of the review process shall be the production of a final QAR Report for each Member/CNM. The Report shall be based on the QAR Template, and shall be completed by the Country Lead Reviewer with the assistance of the Support Reviewer and Project Lead Reviewer as necessary, and as described elsewhere in this procedure. All sections of the report should be fully referenced whenever appropriate.

17. Report Contents

Each final QAR Report shall contain the following major items, as laid out in the QAR Template:

- Identification of the Member or CNM it considers
- The background, history and management of the fishery
- A detailed description of all evidence collected by the Review Team, including during the desktop review, consultation conference calls, any other communications with the

Member under review, and the final Member comments, organised by MPR as per the QAR Review template

- A process flow chart, providing a graphical illustration of the processes in place to ensure the fishery complies with the MPRs. This should include, but is not limited to, pre-season administration, catch and bycatch monitoring, control and enforcement
- A SWOT analysis of the collected evidence against the MPRs, which should include discussion of major identified strengths, weaknesses and risks of the management processes, and any recommendations for improvement
- Peer review report and responses to peer review comments from the Assessment Team
- An annex providing examples of any supporting paperwork, including catch reporting forms, observer data collection forms, licencing and auditing forms, and so on

Figure 1 - Final QAR Phase 1 methodology flow chart

