

FIA PNG RSP Internal Audit Procedure V2.0 | February 2024





Procedure Information

This procedure has been prepared with the support of the Fishing Industry Association members (FIA) of Papua New Guinea (PNG).

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1. Introduction

The FIA Office (FIAO) is fully responsible for managing and ensuring that FAI PNG meets RSP requirements. When a site or member joins the FIA PNG MSC group, it will be audited on regular bases in announced and unannounced audits (on-board, unloading and documentation-based).

FIAO and all the members of the FIA PNG RSP will allow the certification body (CB) of the MSC fishery standard, MSC CoC standard, FISH certification for Crew, NFA officers, and any third-party audit team aligned with the FIA PNG RSP to audit at any time the implementation of the FIA PNG RSP pillars on-board against the specific standard and scope, also allow the accreditation body, access to audit (witness or compliance audits).

The following internal audit process describes the FIA PNG RSP controls for assessing and ensuring the FIA PNG Group certification/ members, comply with FIA PNG RSP pillars requirements. The FIAO must comply with these procedures and maintain accurate records in order to demonstrate compliance.

2. Purpose

This procedure delineates the system for planning, conducting, and reporting Internal audits to ensure that the documented FIA PNG RSP Management System of Fishing Industry Association Inc. of Papua New Guinea complies with FIA PNG requirements RSP pillars Requirements and Standards. This procedure is set forth to verify that the documented FIA PNG RSP is effectively implemented and maintained.

3. Scope

This procedure applies to all FIA PNG RSP pillars and the management system.

1. Sustainability – MSC fishery standard
2. Marine litter and Fishing gear – Internal requirements
3. Traceability – iFIMS / Internal requirements
4. Fishers and Crew welfare - FISH certification, RFVS, and internal requirements

4. References:

- 4.1 Responsible Sourcing Policy v6.0
- 4.2 Social Responsibility and Human Rights onboard v3.0
- 4.3 Marine litter and fishing gear v4.0
- 4.4 Traceability transshipment v4.0
- 4.5 MSC fishery standard v2.2
- 4.6 FISH certification for Crew v1.1



5. Definitions

- 5.1. "Findings" – a statement of fact made during an audit and substantiated by objective evidence.
- 5.2. "Observation" - a finding which does not fail to meet any requirements of the RSP pillar or a Standard. However, if unattended, may lead to a potential minor or major non-conformance in the future.
- 5.3. "Non-Conformance" - the non-fulfillment of a requirement or failure to comply with a requirement of a standard; in the case of FIA PNG, it is a failure to comply with the requirement of the FIA PNG RSP pillars and any of the group certifications mentioned in the point # 4.
- 5.4. "Critical Non-conformance" - Total non-conformity to the delineated general requirements of the standards. This finding is an indication of serious failure to comply with the FIA PNG RSP and standards requirements.
- 5.5. "Major Non-Conformance" - relates to the absence or breakdown of the system to meet the requirements of a clause of FIA PNG RSP and references (point 4), or the site has not reached the sufficient level to be approved by FIA to join the FIA PNG members group (FIA PNG RSP point 9)
- 5.6. "Minor Non-Conformance" - are raised when deficiencies have been identified in a process in the operation of the organization's group standards and FIA PNG RSP pillars but which are less severe than warrants a major NC.

6. Authorities and Responsibilities:

- 6.1. The FIA PNG RSP Sustainability Director shall ensure that the procedures for the conduct of an internal audit of all FIA PNG sites or members are effectively implemented and continually reviewed for suitability. He/she shall ensure that the appointed FIA PNG Auditors possess the necessary competencies to carry out the task delineated herein.
- 6.2. The FIA PNG Auditors shall be responsible for the conduct of audit according to planned intervals to all FIA PNG RSP, MSC fishery standards, Traceability, FISH certification for Crew, Marine litter & Fishing gear, and any regulation applicable for the FIA PNG members or sites.
- 6.3. The FIA PNG Office headed by the FIA Chairman/Board shall ensure that all findings noted during the internal audit are acted upon within a reasonable time frame.
- 6.4. The Auditee shall be responsible for assisting the FIA PNG Office (FIA PNGO) Auditors during the audit, determining the necessary corrective/preventive actions in case nonconformity is found during the audit, and ensuring the implementation and effectiveness of the corrective/preventive actions.
- 6.5. FIA PNG office will assign qualified and competent auditors to carry out the internal audits of our members. Currently, we have one (1) qualified auditor and one (1) auditor under training. In addition, our FIA PNG members also have competent internal auditors to carry out their own internal audits and report to the FIA PNG office.



7. Principle/ Guidelines:

7.1. Internal Auditor Qualification Criteria

7.1.1. Internal auditors shall comply with qualification criteria as follows:

7.1.1.1. Be appointed by the FIA PNG office Management team;

7.1.1.2. All auditors shall be able to demonstrate knowledge of the FIA PNG RSP pillars, MSC fisheries standard, FISH certification for Crew, and the requirements for group certification;

7.1.1.3. Internal auditors of activities performed at the site level shall have a minimum of five (5) year's experience in fishing industry supply chain activity at the point in the supply chain that the group activities occur and shall be able to demonstrate that they understand audit processes, and undertake internal audits;

7.1.1.3.1. *For Internal Audit Head - at least a college graduate, with more than 5 years of work experience in the fishing and/or manufacturing industry, shall be able to demonstrate knowledge of the MSC fishery requirement, SA8000 training, be familiar with NFA fisheries regulations, and the requirements of the group certification, attended and passed an audit training for internal audit (ISO19011:2018)*

7.1.1.3.2. *For Audit Member – the education requirement shall be at least a college graduate with 3 years of work experience in the fishing and/or manufacturing industry and shall be able to demonstrate knowledge of the MSC fishery standard, FISH certification for crew, and FIA PNG RSP pillars.*

7.1.1.4. Where more than one auditor is used to conduct internal audits of sites, there shall be at least one internal audit each year where each auditor is "shadowed" by another auditor to provide feedback aimed at ensuring consistency of interpretation of requirements and decisions. Records of shadow audit shall be kept.

7.1.1.5. Auditors shall have an approved ISO 19011:2018 training course; if not, the FIA PNGO immediately will provide for it.

7.2. The FIA PNG internal auditing process helps the FIA PNGO accomplish its objectives by bringing a systematic, transparent, disciplined approach to evaluating and improving the effectiveness of risk management, control, and governance processes of the following:

- Responsible Sourcing Policy v6.0
- Social Responsibility and Human Rights onboard v3.0
- Marine litter and fishing gear v4.0
- Traceability transshipment v4.0
- MSC fishery standard v2.2
- FISH certification for Crew v1.1



7.3. The audit process is generally a ten-step procedure as outlined below, FIA has included 3 more steps in this internal audit process. These steps are followed and implemented in each FIA PNG office RSP internal audit.

7.3.1. Notification

7.3.1.1. First, the FIA office through the FIA MSC RSP Representative/ Coordinator will send an email/ letter to inform the site or member of an upcoming audit. The auditor will send to the site or member a preliminary agenda and references. This is a list of documents (e.g. procedures, records) that will help the auditor learn about the site before planning the audit.

7.3.1.2. There will be an unannounced audit that will skip this step.

7.3.2. Planning

7.3.2.1. After reviewing the information, the auditor will plan the review, conduct a risk workshop primarily to identify key risks, raise risk awareness, draft an audit plan, and schedule an opening meeting at the FIA PNG site or member.

7.3.2.2. Full systems audit shall be conducted at least once every year.

7.3.3. Opening Meeting

7.3.3.1. The opening meeting should include site or member Document Controller, Chaplain, QC person, Master fishermen, crew, and any staff that may be involved in the audit. During this meeting, the scope and objective of the audit will be discussed. The site or member is free to ask the auditors to review areas that the site or member is concerned about.

7.3.4. Fieldwork (Purse seiner, crew, officers involved, carrier, unloading, overlapping point)

7.3.4.1. After the opening meeting, the auditor will finalize the audit plan and begin the fieldwork. Fieldwork typically consists of talking with the staff, reviewing procedure manuals, inspecting the FIA PNG RSP pillars, site policy and procedures, testing for compliance with applicable policies and procedures and regulations, and assessing the adequacy of internal controls against the specified scope (standard or FIA PNG pillar) of the internal audit. The site or member's staff is aware that the auditor will be scheduling meetings with them.

7.3.5. Communication

7.3.5.1. The auditor will keep the site/member informed, and she/he will have an opportunity to discuss issues noted and the possible solutions.

7.3.6. Report Drafting

7.3.6.1. After the fieldwork is completed, the auditor will draft a report. The report consists of several sections and includes the distribution list, list of attendances, list of interviews, type of audit, the follow-up date, a general overview of the site or process, the scope of the audit, any major



audit concerns, the overall conclusion, and detailed commentary describing the findings and recommended solutions.

7.3.7. Management Response

7.3.7.1. Once the report is finalized, FIAO will request the FIA PNG member (fishing company) site for their responses. The response consists of 4 components: whether the site agrees or disagrees with the problem; the development of a Root Cause Analysis RCA: the action plan to correct the problem and; the expected completion date will be coordinated with the FIA PNG RSP Social Responsibility Coordinator and FIA PNGO Sustainability Director.

7.3.8. Closing Meeting

7.3.8.1. A closing meeting will be held so that everyone can discuss the audit report and review the FIA PNG fishing company/site or member and management responses. This is an opportunity to discuss how the audit went and any remaining issues.

7.3.9. Report Distribution

7.3.9.1. The report is then distributed to the FIA PNG Office and site/member audited.

7.3.9.2. An audit feedback form is also distributed to the audited site to request feedback about the audit. Feedback is important to the FIA Office since it will help to improve the audit process.

7.3.9.3. The FIA PNG internal audit reports will be available for any third-party or second-party audit review and also be part of the annual management reviews.

7.3.10. Nonconformances

NCs raises during FIA PNG RSP internal audit shall be graded as major or minor.

An NC may be graded major if one or more of the following apply:

7.3.10.1. An NC that persists over time (i.e. that is not a one-off occurrence but is nonconforming on multiple occasions).

7.3.10.2. An NC that is Repeated.

7.3.10.3. A minor NC is not adequately addressed by the FIA PNG member or fleet or fishing vessel within the established timelines.

7.3.10.4. Absence, or Systemic failure, of one or more element/s of the FIA PNG RSP's Management System.

7.3.10.5. Where an FIA PNG RSP procedure requirement has not been fulfilled because one or more major/critical NCs, found at FIA PNG member (fishing vessel) level, have demonstrably not been correctly identified, graded or addressed by the FIA PNG Office.

Any NC that does not meet the criteria of a Major NC shall be considered minor. Minor NCs are usually isolated or non-systemic failures of FIA PNG RSP procedure requirements that do not significantly compromise the validity of membership of the FIA PNG member

In case during FIA PNG internal audit (second party) majors are found in a fishing vessel or a fleet, FIA PNG Office will ask the member to provide: 1) a Root Cause Analysis (RCA): An analysis tool used



to determine the root cause of a problem including an evaluation of the extent and scale of the problem identified to determine if it has occurred elsewhere. 2) a preventive plan to avoid the recurrence of this NC, and 3) corrective action plans to fix the major nonconformity within a period of 3 months. At the third month; for initial verification on the desk, FIA PNG Office shall receive the proof and evidence that the major NC has been closed. A later verification on-board, or at the Port will be carried out on the next possible audit on-site, but not later than 12 months.

For minors a period of 12 months is applicable.

Opportunities for improvement, an FIA PNG finding where the evidence observed indicates that a FIA PNG RSP Procedure requirement has been met but based on FIA PNG assessment team's professional experience and knowledge, improved performance and/or implementation may be possible.

If Majors NC are no addressed appropriately and within the timelines provided by the FIA PNG office, the fleet or member or fishing vessel shall be removed from the group to maintain the rigorous, robustness, and credibility of the FIA PNG RSP.

FIA PNG board members will assess the re-join process of the member that did not follow the FIA PNG RSP Procedures and requirements. A full FIA PNG board consensus will be needed for including back the fleet or fishing vessel to the FIA PNG group

7.3.11. Decision on-site conformity

7.3.11.1. The final decision on whether a site is in conformity with all FIA PNG RSP (pillars), certifications, and group requirements are made by a member of the FIA PNG Office team who did not do the site's audit or was not involved in the site's audit report.

7.3.11.2. The final decision will be communicated to the FIA PNG member/ site team. Then the site or member name and basic date will be included on the FIA PNG office database, iFIMS, and website and its status (public access place).

7.3.12. Follow-Up

7.3.12.1. The FIA PNG team or specific Coordinator is responsible for the follow-up reviews. These are performed on an issue-by-issue basis and typically occur shortly after the expected completion date, so that agreed-upon corrective actions can be implemented. The purpose of the follow-up is to verify that the site/member has implemented the agreed-upon corrective actions. The auditor will interview staff, perform tests, or review new procedures to perform the verification. The site/member will then receive a letter/email from the FIA PNG Office indicating whether site has satisfactorily corrected all problems or whether further actions are necessary.

7.3.13. Audit sampling and surveillance time

7.3.13.1. Prior to the beginning of each calendar year, the FIA PNG office team shall perform an annual review of all internal audits and assessments obtained for each Fishing/carrier record/form pertaining to the FIA PNG office from the previous year.



- 7.3.13.2. This annual review shall include a synthesis of results from office, documentation and integrated audits reports (from fishing to reception at the factory – weighing).
- 7.3.13.3. The FIA PNG RSP/office Representative/Coordinator shall inform the FIA Office about her/his findings and where the results from sampling were found to be inadequate or insufficient. The FIAO PNG RSP Representative/Coordinator shall make recommendations to improve the site conditions in order to address risks. An improvement plan shall be incorporated into the annual plan for the coming years.
- 7.3.14. Members or sites to be audited:
- 7.3.14.1. Fishing Vessel (Purse seiner)
 - 7.3.14.2. Crew, staff, and Officers
 - 7.3.14.3. Fishing company documentation
 - 7.3.14.4. Carriers’ operation
 - 7.3.14.5. Carriers’ company documentation
 - 7.3.14.6. Tuna processors (Until the overlapping point – unloading/sorting/ weighing)
 - 7.3.14.7. Quality and content of training session and Quality of the trainer.

8. Planning and frequency of internal audits

#	Area/Standard/Regulation/ Policy	Audit frequency/plan
1	Responsible Sourcing Policy v6.0	Annual
2	Social Responsibility and Human Rights onboard v3.0	Annual per fleet
3	Marine litter and fishing gear v4.0	Annual per fleet
4	Traceability transshipment v4.0	Monthly
5	MSC fishery standard v2.2	Annual
6	FISH certification for Crew v1.1 8.6.1 Second party (FIA PNG office): Per fleet and using FISH audit sampling risk tool V1.0 8.6.2 Internal audits (Fleet members): One fishing vessel per fleet. Based on sampling of the fleet 8.6.3 Associated fleet (Linked to PNG processor and the same management of a sister fleet): One fishing vessel per fleet	Annual



	Reports and non-conformities shall be sent to FIA PNG office every year (8.6.2 and 8.6.3)	
7	Others	As needed

9. Audit Records

9.1. FIA PNG RSP Audit Checklist, Audit report, NCs and procedures



10. History of Revision

Revision No.	Date	Reasons/ Details
01	April 2022	Initial Release / M. Hidalgo
02	February 2024	After FISH third party 7.3.10.5