



US Farm-Raised Catfish Environmental Sustainability Certification Program

Quality Manual and Operating Procedures

Document Title	Quality Manual and Operating Procedures
Revision Number	Version 2.1
Technical Committee Approval Date	January 21, 2025

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List of Abbreviations

Abbreviation	Definition
AB	Accreditation Body
ASQC	American Society for Quality Control
Catfish Sustainability Program	US Farm-Raised Catfish Environmental Sustainability Certification Program
CB	Certification Body
CFA	Catfish Farmers of America
CFR	Code of Federal Regulations
CIP	Continuous Improvement Point
GAA-BAP	Global Aquaculture Alliance-Best Aquaculture Practices
QMS	Quality Management System
RAB	Registrar Accreditation Board of the American Society for Quality Control
US	United States of America
USDA	United States Department of Agriculture
USDA-FSIS	United States Department of Agriculture-Food Safety and Inspection Service
USDA-PVP	United States Department of Agriculture-Process Verified Program
USDA-QAD	United States Department of Agriculture-Quality Assessment Division

INTRODUCTION

General Information

Standard Name: US Farm-Raised Catfish Environmental Sustainability Certification Program (US Catfish Sustainability Program)

Standard: US Farm-Raised Catfish Environmental Sustainability Certification Standard

Founding Date: 2022

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Mission of the US Farm-Raised Catfish Environmental Sustainability Certification Program (US Catfish Sustainability Program)

The mission of the US Farm-Raised Catfish Environmental Sustainability Certification Program (Catfish Sustainability Program) is to provide clear and auditable definitions of management practices that reduce environmental impacts from catfish production while improving husbandry practices and health of the catfish raised. The program provides clear definitions for responsible environmental stewardship for catfish producers who choose to further reduce environmental impacts, improve management practices, and provide greater accountability to their buyers and the public.

The program requires that individual farms participate in the quality management system (QMS) for environmental sustainability, which is third-party audited for compliance. The Process Verified Points included in the US Catfish Sustainability Program are those for which no regulations or QMS criteria are currently in place. These process verified points conform to Items 6.3.b (“production and/or handling practice that provides specific information to consumers to enable them to make informed decisions on the products that they buy”) and 6.3.e (“characteristic, practice, or requirement that is specifically requested by a customer or consumer”) of the USDA-Quality Assessment Division (QAD) 1001 Procedure of the USDA Process Verified Procedure (USDA-QAD-1000, 2023).

Objectives

1. To provide greater accountability of the environmental sustainability of US Farm-Raised Catfish to buyers and the public.
2. To develop and encourage participation by US catfish processors, farmers, hatcheries, and feed mills in a quality management system for environmental sustainability.
3. To provide clear definitions for those aspects of environmental sustainability not covered and enforced by US law.
4. To provide the rigor of 3rd-party verification of environmentally responsible practices through the rigor of professional US Department of Agriculture (USDA) auditors for scrutiny of farm, hatchery, and feed mill practices.

5. To provide clear information to consumers through the use of the USDA shield¹ that is widely trusted among US consumers who are increasingly confused by the hundreds of eco-labels in the marketplace.
6. To make available the US Catfish Sustainability Program to all applicants who process and grow channel (*Ictalurus punctatus*) and hybrid (♀ *Ictalurus punctatus* x ♂ *Ictalurus furcatus*) in the US regardless of size, scale, management, business structure, or number of farm sites.

Scope

The scope of the US Catfish Sustainability Program is the US farmed catfish industry that includes US processing plants, farms, and hatcheries that grow, process, and sell channel (*Ictalurus punctatus*) and hybrid (♀ *Ictalurus punctatus* x ♂ *Ictalurus furcatus*) catfish and the feed mills that supply feed to farms and hatcheries. The seafood ingredient to be certified is U.S.-farmed catfish. The U.S. Sustainability Program is applicable only to U.S. farmed catfish. Use of the certification logo requires that all (100%) certified product be U.S. farmed catfish. All production systems used to raise channel and hybrid catfish in the US are included in the scope.

The US Catfish Sustainability Program is a voluntary program of the Catfish Farmers of America that does not, and cannot, require all US catfish companies to participate. CFA is a trade association for which membership is voluntary and does not control or influence access to markets.

Geographic scope. The geographic scope of the standard is US catfish farms, hatcheries, feed mills, and processing plants. The US Catfish Sustainability Program is open to all US catfish industry applicants located within the US regardless of size, scale, or business structure through membership in the Catfish Farmers of America. The majority of US catfish businesses are located in the four-state area of Mississippi, Alabama, Arkansas, and Louisiana (USDA-NASS, 2024; Hegde et al., 2022).

Summary Description of the Standard

The US catfish industry is committed to producing the highest-quality products in an environmentally responsible manner. US farmed catfish has been a Best Choice in terms of environmental sustainability by Seafood Watch for a long time. However, the more than 500 eco-labels in the marketplace have created confusion among US consumers. We have chosen to welcome the rigor of 3rd-party USDA auditors onto our farms, hatcheries, feed mills, and processing plants for additional scrutiny of our practices. In addition, research has continued to show that US consumers trust the USDA label more than other labels. At the end of the day, consumer choices are the driving force in sustaining our vital ecosystems across the planet.

History of Development

The efforts by the Catfish Farmers of America (CFA) to identify a rigorous and applicable environmental sustainability certification program that provides the desired accountability to buyers and end consumers began 16 years ago, in 2009 (Figure 1). Following discussions

¹ Use of the USDA Shield must be approved by USDA-PVP prior to its use. As US government property, use of the USDA Shield without permission is illegal and subject to criminal penalties.

internally and with retailers, CFA initiated discussions with the Global Aquaculture Advocate (now the Global Seafood Alliance) Best Aquaculture Practices (GAA-BAP) program in late 2015. A committee of catfish growout and hatchery producers, processors, and feed mill representatives was formed and a series of meetings held with GAA-BAP staff and consultants from late 2015 into early 2017. However, it became clear that the GAA-BAP standards were developed primarily for aquaculture businesses in other countries, and evidence began to mount of continued negative environmental effects in other countries despite certification. Additional concerns emerged related to potential conflicts of interest stemming from board members representing companies that were certified and that farms and other audited businesses paid auditors directly for travel and other fees. As a result, CFA began to search for a more rigorous and credible 3rd-party certification program that inherently avoided such conflicts of interest. A survey of US catfish processors conducted in 2019 showed substantial interest in a 3rd-party audited environmental sustainability program.

CFA became aware of the USDA-Processed Verified Program (USDA-PVP) in early 2021 and initiated an effort to assess whether it would provide the rigorous, 3rd-party verification of environmental sustainability that it sought. Efforts included a series of meetings with USDA officials and CFA members to develop the standard for the US Farm-Raised Catfish Environmental Sustainability Certification Program. The standard underwent four reviews by USDA with final approval for inclusion of the US Sustainability Standard in the USDA-PVP Program in May, 2022.

The first approval of a company to participate in the US Catfish Sustainability Program was announced in June, 2024. The approval was granted based on successful outcomes of a desk audit that was followed by a series of on-site audits of the processor, farms, hatcheries, and feed mills that participate in that processor's supply chain.

Size and Diversity of the US Catfish Sustainability Program

The US Catfish Sustainability Program focuses on the US catfish industry which is, by far, the largest sector of US aquaculture. According to the 2022 USDA Census of Agriculture (USDA-NASS, 2024), there were 646 farms raising catfish in the US, with sales of \$428.75 million. US catfish sales increased by 6% from the value reported in the 2017 USDA Census of Agriculture. The US Catfish Sustainability program was structured so that processing companies would manage the required quality management system (QMS). This structure was chosen because the rigor of the management and oversight required by USDA auditors would preclude participation of smaller farms that often do not have sufficient personnel to manage such a program. Management of the QMS by processors provides a mechanism for all scales of farms and supply chain partners to participate and also provides a foundation for continuous improvement. Approval by USDA for inclusion in the PVP program includes audited approval of the supply chain partners that are integrated into the overall QMS of each processor. The required audits by USDA, both desk top and on-site audits, include supply chain partners, but it is the responsibility of the processing company to ensure that all required training, procedures, record-keeping, and document control are fulfilled. The first processor to be approved by the program, Consolidated Catfish Company LLC, is one of the larger catfish processing companies and purchases much of their catfish from farms of varying sizes across several states.

Catfish Farmers of America (Scheme Owner)

Mission

Catfish Farmers of America (CFA) is a non-profit trade association that was formed in 1968. It is an association of US farm-raised catfish producers, suppliers, processors, and marketers. The purpose is to develop, stimulate and encourage harmony, goodwill and understanding among catfish farmers and to promote the general welfare of the US catfish industry.

Membership & member categories

The membership of the Catfish Farmers of America consists of those actively producing farm-raised catfish commercially and supply chain partners who provide supplies and services to catfish farmers, including processing, financing, transportation, merchandising, marketing, and advertising of farm-raised catfish and those involved in educational research, regulatory, or consulting work for members.

Specific membership categories are: Regular, Sustaining, Associate, and Academic/Technical Members. Regular members are individual and corporate producers actively producing farm-raised catfish. The Sustaining Membership category includes processors and feed mill representatives of companies actively processing and manufacturing feed for catfish farmers. Businesses and individuals that supply inputs and financial services to the catfish farming industry join as Associate Members, and individuals from academia, research, regulatory, and technical consulting entities join as Academic/Technical Members.

Organizational structure

The Catfish Farmers of America is governed by its Board of Directors (Figure 2). Directors must be actively farming catfish in the US for commercial purposes, maintain current status of dues payments, and participate in the feed mill checkoff program. Directors are not compensated for their service. Twenty-four of the 29 Directors are elected by state associations affiliated with the Catfish Farmers of America with the number of director slots per state determined by each state's proportion of the total paid acreage of catfish farms. The remaining five slots are elected by residents of states in regional time zones who may not otherwise be eligible to vote. Directors are elected at their state association meetings or at the annual meeting of the Catfish Farmers of America and serve until new directors are elected, up to a maximum of nine years.

Key personnel positions and roles

The Catfish Farmers of America Board of Directors employs an Executive Vice President to carry out the charges of the Board. The Executive Vice President oversees the office and staff of the organization, plans and organizes the annual meeting, and develops and leads initiatives as specified by the Board.

The leadership of the Board consists of the members of the Executive Committee that includes the Chairman of the Board (the immediate past president), the President, Vice-President,

Secretary, Treasurer, and four additional Board members. All members of the Executive Committee are elected from among the membership of the Board. The Chairman presides over all meetings of the Board, with the President assuming responsibilities in the absence of the Chairman. The President presides over meetings of the Executive Committee and performs additional duties as specified by the Board. The Vice-President chairs the Membership Committee and succeeds to the Presidency if the President is absent or disabled. The Secretary maintains records of all meetings of the association and of the Board and supervises books and record-keeping generally, including a general membership roster. The Treasurer maintains financial records and provides oversight and reporting of receipts, disbursements, and other financial transactions.

Decisions are made through votes of Board members. A series of committees appointed by the Board are charged with various matters of interest to the Board. Committees include: Membership, Catfish Journal Publication, Annual Convention, Industrial Relations, State Associations & Affiliates, Research, and State & Federal Legislation/Regulations.

PROCEDURES OF THE US FARM-RAISED CATFISH ENVIRONMENTAL SUSTAINABILITY CERTIFICATION PROGRAM (US CATFISH SUSTAINABILITY PROGRAM)

Fee structure

The Catfish Farmers of America does not charge a fee for participation in the Catfish Sustainability Program. The only fees paid are those to the Certification Body (USDA-Processed Verified Program/USDA-PVP) to cover the expenses of the audits and the administration of the 3rd-party auditing services. The fees are set by the USDA-PVP Program. The USDA-PVP fees are paid by the processing companies, not individual farmers, hatcheries, or feed mills.

Stakeholders

The stakeholders of the US Catfish Sustainability program are the members of the Catfish Farmers of America. Membership includes those actively farming catfish on a commercial scale in the US along with supply chain partners. The categories of stakeholders include processors, feed manufacturers, those operating hatcheries that provide fry and fingerlings to growout farms, and others who provide financial, marketing, regulatory, and research/education assistance to the US catfish industry.

For businesses that include all sites as a single business cost center, the multiple sites are considered as one site when establishing which entities are audited each year whereas companies that have separate business cost centers for multiple sites are considered as separate sites for auditing purposes. For a processing company with more than one processing site, the site that houses the individual responsible for administering the Catfish Sustainability Program will be the one visited, but the audit records must include those of the various other sites. All farms that supply fish to any of the processing sites are included in the pool from which random samples of farms are drawn to be audited each year. Similarly, all feed mills and hatcheries that supply feed

and fingerlings to growout farm suppliers to any of the processing sites of the company will be included in the overall pool from which a sample will be audited in any given year.

Given that the stakeholders of the US Catfish Sustainability Program are US businesses, the language of the Standard is English, the national language of the US.

Organization of the US Farm-Raised Catfish Environmental Sustainability Certification Program (US Catfish Sustainability Program)

Figure 3 presents an overview of the organization of the US Catfish Sustainability Program. The Owner of the Standard (the Scheme) is the Catfish Farmers of America, who manages the review and revision of the standard and provides oversight for it through its Standards Committee. The Standard reflects the sustainability objectives of the Catfish Farmers of America.

The US has one of the most stringent and rigorous sets of environmental laws, rules, and active enforcement to effectively address environmental issues (Abate et al., 2016). The US Catfish Sustainability Standard acknowledges existing laws, rules, and active enforcement agencies and personnel, and focuses on those aspects of environmental sustainability that are not covered by US laws, regulation, and enforcement.

The Certification Body is the USDA-Processed Verified Program. The USDA-PVP is a governmental program authorized in the Code of Federal Regulations (CFR) Title 7, Part 62. USDA-PVP only accepts inclusion of standards that undergo review and approval through the review process of the USDA-PVP program (QAD 1115, 2019). The USDA-PVP program has full-time professionally trained auditors (USDA-QAD 1205, 2019; USDA-QAD1250, 2019) on staff who conduct the desk and annual on-site audits of catfish processors, growout farms, hatcheries, and feed mills. The audits conducted verify compliance or non-conformance of the participating catfish processors and their supply chain partners against the Standard. As a US federal government agency, USDA cannot audit regulations implemented and enforced by other federal agencies.

The Accreditation Body is the USDA-Quality Assessment Division (QAD). The USDA-QAD is a government entity that operates under ISO 19011 guidelines for quality and/or environmental management systems auditing and provides oversight of the USDA-PVP and other Quality Systems Verification Programs.

Standards Committee of the Catfish Farmers of America

Purpose

CFA has formed a Standards Committee to provide oversight to the US Farm-Raised Catfish Sustainability Standard. The specific charges of the Committee are to: 1) provide a mechanism for representation of the major types of stakeholders for the program; 2) ensure that the requirements are clear, specific, objective, and verifiable; 3) ensure that requirements do not favor any particular technology or service provider; and 4) proper attribution is made to original sources and relevant laws.

Composition and representation

The CFA Standards Committee includes representation of US catfish growout and hatchery farms, and US catfish processors. Research and/or Extension professionals familiar with US catfish farming are also included on the Standards Committee. The Standards Committee includes representation from multiple states.

Decision-making

The Standards Committee meets annually either in person or virtually. The standing agenda includes review of the annual report on the program and discussion of the Standard. Any comments received from stakeholders or the public are further discussed. Roberts Rules of Order are followed in all committee meetings. Decisional agenda items require a motion and second by committee members, followed by discussion and a vote. A majority vote is required for approval of motions.

The decision-making process ensures that those stakeholders who are affected directly by the standard have the opportunity to participate in the decision-making process through representation. While decision-making is limited to members of CFA, the membership criteria indicate that all those actively involved in US catfish production and affiliated supply chain partners, along with research, Extension, and technical consultants actively involved in the US catfish industry are eligible for membership. Membership categories and criteria are specified in the CFA Bylaws and all sizes of business and demographic categories of business ownership are eligible.

The Quality Manual and Operating Procedures describes the process used to document decisions made on the content of the standard and issues notices to its stakeholders of all decisions made with regard to the content of the Standard and the rationale for those decisions.

Standard-setting process

Initial Development. The Catfish Farmers of America began the search to develop a robust and rigorous US Catfish Sustainability Program in 2009. Discussion began with the committees and membership of CFA, and the Executive Vice-President was charged with seeking a framework for the program. Following initial meetings with producers, processors, and their customers, the potential to develop an effective program with GAA-BAP was explored. Meetings were held with the consultant brought on by CFA and representatives of the GAA-BAP program beginning in late 2015. By early 2017, it became apparent that the GAA-BAP program's primary focus was on environmental issues of farms in other countries that were not relevant to US catfish farms because of different management systems. A second challenge was that catfish farms in the US operate under one of the world's most rigorous environmental regulatory systems that is accompanied by strong enforcement mechanisms and staff (Abate et al., 2016). When evidence mounted of continued negative environmental effects in other countries despite certification, CFA began to search for a more rigorous and credible 3rd-party certification program. A standard that would contribute to on-going improvement in environmental sustainability for the US needs

to account for the regulatory system to which US producers must comply with to stay in business.

A survey was conducted of processors in 2019 to assess needs of US catfish processors with respect to a sustainability program. Results showed that there was clear need and substantial interest in alternatives to existing certification programs. The CFA Executive Vice President became aware of the USDA-PVP program in early 2021 that was based on professionally trained auditors and was backed by the integrity, policies, and procedures of the US federal government. The consultant was asked to work with USDA-PVP personnel to explore the potential to develop a US Catfish Sustainability Program within the structure of the USDA-PVP. The consultant subsequently worked with CFA members to develop and submit a first draft of the Standard in late 2021. Following four reviews within USDA, formal approval to include the US Farm-Raised Catfish Environmental Sustainability Program in the USDA-PVP program was received in May, 2022.

Following the approval in 2022, followup meetings were held with industry, USDA, and CFA to provide background information and details on the application process, but especially the Quality Management System required by USDA-PVP. The Quality Management System is the foundation of the USDA-PVP program. It is an intensive management system that requires processing companies and supply chain partners to adhere to rigorous management and oversight provisions.

The first US catfish company was approved for participation in the USDA-PVP program in June, 2024, following a desk audit and on-site audits of the processing company, farms, hatcheries, and feed mills.

The effort to develop a sustainability standard for US farmed catfish involved many consultations with USDA-PVP personnel, catfish farmers, feed mills, and processors, with constant communications among those groups, the consultant, and the CFA Executive Vice President.

Going forward. The initial development of this one-of-a-kind program involved many individuals. The Catfish Sustainability Program was the outcome of many years of catfish business stakeholders asking CFA to develop a sustainability program. Stakeholders have been engaged throughout the various efforts to develop a program that acknowledged and did not conflict in any way with the regulatory laws and enforcement systems in place in the US at local, state, and federal levels. Nearly all US catfish processors have been involved to some degree with the program development, although some more so than others. In several cases, multiple employees of various processors and farms have been engaged through committee service, participating in virtual meetings, in correspondence with the consultant working on the US Catfish Sustainability Program, through their service on the CFA Board of Directors, and attendance at the CFA annual conventions. On average, in any given year, approximately 10 US catfish processors (that process the majority of catfish processed in the US) have had on average 19 employees participate in at least one meeting each year, eight US catfish farmers per year, five hatchery farmers a year, and two feed mill representatives have participated in various meetings specific to the US Catfish Sustainability Program. In addition, reports on the

development of the US Catfish Sustainability Program have been presented at every CFA Board meeting, many Executive Committee meetings, and at meetings of The Catfish Institute Board of Directors each year since 2016. Presentations on the Sustainability Program have been made at annual conventions of the Catfish Farmers of Arkansas (approximately 75 attendees), at the triennial Research Symposium of the Catfish Farmers of America (several hundred attendees), and at the Catfish Farmer Leadership Conferences (approximately 20 attendees each year). In the interim between the various board and other meetings, there have been numerous email and telephone communications that have provided input and feedback into the development of the US Catfish Sustainability Program. In 2023, USDA-PVP officials organized a virtual meeting during which they reviewed the application processes and requirements of the auditing program and included opportunities for questions and answers and for stakeholders to provide input to USDA. All catfish processors in the Mississippi/Alabama/Arkansas/Louisiana region participated in the call.

Given that the first company has passed the audits and has been enrolled in the program, a formal Standards Committee has been formed within CFA. The CFA Standards Committee includes representatives of the major segments of the US catfish industry, with producers, processors, hatcheries, and technical experts (research and Extension specialists with experience in the US catfish industry). Reports are provided to the CFA Standards Committee on the progress of the program, and a link to submit questions and comments is provided at <https://uscatfish.com/sustainability>.

The Committee's charge is to oversee the US Catfish Sustainability Program. The Committee meets formally once a year. Key responsibilities include review of the annual management review and the annual report, make decisions on modifications or revisions to the Standard and to the Quality Manual and Operating Procedures, and oversee the 5-year review. In addition, as the US Catfish Sustainability Program expands, the Standards Committee, in cooperation with USDA-PVP personnel, will schedule virtual trainings for auditors on revisions of the Standard and for those companies seeking to apply for the program.

Participation and consultation

The Standards Committee issues notices to its stakeholders of all decisions made with regard to the content of the standard and the rationale for those decisions through email correspondence, annual reports to the CFA Board, and to the CFA membership at its annual membership meeting. When approved by the CFA Standards Committee and the USDA-PVP, the Standard is posted online at <https://uscatfish.com/sustainability>. In the event of changes to the program, including revision of the standard, all stakeholders are not only notified, but those participating directly in the US Catfish Sustainability Program are notified that they will have 1 year to come into compliance with the revised standard.

Public comment

The website (<https://uscatfish.com/sustainability>) includes a link that is available throughout the year for individuals to send comments or suggested improvements to the Catfish PVP Standard. Responses to comments received are included with responses in the Annual Reports of the

program. All public comments are logged, along with responses and summarized in the Annual Report, as part of the overall document control procedures. Comments received and responses are included in the Annual Management Review section of the Annual Report. The Annual Reports are made available to the public on the website.

At the outset of the process to revise the Standard, CFA will post information on the web about how to contribute to the process, including a link through which comments can be submitted on the proposed scope, objectives, and justification of the need for the standard, the steps involved, timeline, and the decision-making procedures set forth above. Opportunities to contribute will be clearly identified by the Standards Committee. A summary of the process will be easily available for the public online, and the members of the Standards Committee will be posted online.

The Standards Committee includes not only stakeholders (growout and hatchery farmers, processors, suppliers of inputs and services, including financial institutions), but also independent technical experts.

The revised Standard is released for a 60-day comment period. The announcement will encourage stakeholders to take advantage of the opportunity to review the draft of the revised Standard and submit comments to the email address posted with it. An email notification will be sent out to all stakeholders at the start of the 60-day public comment period to encourage participation. A second round of 30 additional days for comments will follow. All comments received will be recorded on the Public Comment and Response Log and summarized in the Annual Report. In doing so, confidentiality of those who submitted comments will be maintained. All stakeholders will be contacted repeatedly via email notices and announcements made at the annual meeting of the Catfish Farmers of America. At the same time, the Standard will be submitted for review by the USDA-PVP Program experts to ensure that the process points to be verified are verifiable, repeatable, auditable, feasible, and factual as required by USDA-QAD 1000 (USDA-QAD, 2023).

Complaints

The Standards Committee maintains a file of complaints or disputes with regard to the US Catfish Sustainability Program in the CFA Home Office. Each complaint filed is first reviewed by the Chair of the Standards Committee for the US Catfish Sustainability Program, who then notifies the members of the Standards Committee, with a recommendation as to whether the complaint is a short-term issue that requires attention by the Standards Committee, or if it is a longer-term issue that is best discussed by a full meeting of the Standards Committee. If resolved by the Chair, the complainant and the Standards Committee are notified of the action taken and the outcome. If the complaint is short term but requires attention of the Standards Committee, then a meeting is convened by the Standards Committee to select the most appropriate plan of action. If a long-term issue, the complaint is added to the agenda of the next regularly scheduled meeting of the Standards Committee.

Assessment of feasibility and auditability

In the US Catfish Sustainability Program, the assessment of feasibility and auditability was made by experts of the USDA-PVP program. The USDA-PVP program requires that standards be “verifiable, repeatable, auditable, feasible, and factual” (USDA-QAD, 2023) for approval for inclusion.

Review period, process, and revision

The Standards Committee of the Catfish Farmers of America will conduct a formal review of the US Catfish Sustainability Program every 5 years. Given the official start of the program in June, 2024, with approval of the first catfish processor, the first 5-year review is scheduled for 2029. The process that will be used to further develop and revise the Standard is illustrated in Figure 4.

The review process will include the following steps:

1. The Chair of the Standards Committee will develop a preliminary draft of a revised Standard based on a review of annual reports that include public comments and complaints received over time as well as suggestions received following notification to stakeholders that a review is being initiated. Suggestions for improvement will also be requested from USDA-PVP. Relevant scientific information will further be reviewed by the Chair and referenced in the draft revised Standard. The Chair will further assess the scope, objectives, justification for the need for the program, its principles and terms of reference, and the decision-making processes used in developing the preliminary draft. The preliminary draft of the Standard will be accompanied by a revised Quality Manual and Operating Procedures document.
2. The review will include opportunities for public comment. This will include notification of all program stakeholders (CFA members regardless of business size or location) to provide information and contact information on how to contribute comments and participate in the review. A 60-day comment period will be announced in The Catfish Journal and on the web, along with a second-round, 30-day, opportunity to submit comments.
3. All information received, including public comments and responses, will be incorporated into the annual report that includes recommendations for any revisions to the standard. The report will explain and reference appropriate documents and public comments received to justify recommendations for revisions. A synopsis of the revisions will be provided to those who submitted comments.
4. The report will be presented by the Chair to the Standards Committee. Any further revisions from the Standards Committee will then be incorporated and the Committee Draft will be made available for a 60-day public comment period followed by a second, 30-day comment period.
5. The draft that results from any further revisions following public comment will be submitted to the Executive Committee and then to the CFA Board for CFA approval.
6. The CFA-approved draft will be submitted for review and approval by USDA. Once approved by USDA, the revision is dated and all program stakeholders are notified

through email correspondence and an article in The Catfish Journal, including the 1-year transition period to come into compliance.

Oversight

The US Catfish Sustainability Program is designed with multiple layers of oversight. As described above, the Chair of the Standards Committee submits recommendations on revisions to the Standard as well as revisions to the Quality Manual and Operating Procedures to the Standards Committee for review and reporting to the CFA Executive Vice President, then to the CFA Executive Committee, and on to the full CFA Board of Directors for approval.

In the US Catfish Sustainability Program, there is an additional layer of oversight by USDA-PVP that ensures that the process points of the Standard are verifiable, repeatable, auditable, feasible, and factual. The membership structure and representation on the CFA Board of Directors also ensures representation across the major US catfish-producing states, across various supply chain levels of the US catfish industry, and is inclusive of all production scales and systems of US catfish. Non-conformances are defined explicitly in the USDA-QAD 1000 Procedure (USDA-QAD 1000, 2023).

Section 11 of the QAD 1000 Procedure, “Quality Systems Verification Programs General Policies and Procedures”, covers audit findings and the audit report. Audit findings along with any non-conformances identified, continuous improvement points, and recommendations are discussed with the applicant when the on-site audit has been completed. Non-conformances are defined as either major or minor, with a major non-conformance one that compromises the integrity of the program or the product, such as the absence of or complete breakdown of a program requirement. Follow-up audits are required for major non-conformances to ensure and verify that corrective actions have been taken. A minor non-conformance does not compromise the integrity of the program or product, and consists of isolated incidences of non-conformance. Minor non-conformances are expected to be addressed in a timely manner to avoid being upgraded to a major non-conformance. Continuous improvement points are observations of opportunities for improvement. Continuous improvement over time is expected and continuous improvement points can become non-conformances over time if not addressed.

USDA-PVP Programs operate under ethical conduct standards that explicitly include conflicts of interest as per USDA-QAD 1220, 5CFR Part 2635, and 5 CFR Part 8301 for USDA employees.

Document Control

CFA maintains control of documents on the program that includes a log of complaints and responses (Complaint Log and Response Form) as well as a list of all public comments with responses (Public Comment Log and Response Form). The online form for comments includes a section for requesting program records.

The CFA Home Office maintains the records and controls the documents of the Catfish Sustainability Program. These include:

- Quality Manual and Operating Procedures of the US Catfish Sustainability Program.

- Complaint Log and Response Form
- Public Comment Log and Response Form
- List of communications with stakeholders, including those contacted.
- Drafts, final versions, and revisions of the Standard
- Online requests for additional information on the program

Each document is numbered in a format that identifies the type of document and the date when approved by the Standards Committee. For all documents other than the Standard, the documents used are effective as of the date approved by the Standards Committee. For the Standard, the date is not added until the Standard is approved following review by USDA; the date of USDA approval is the effective date.

Certification Body (USDA Process Verified Program)

Independence of the Certification Body (USDA Process Verified Program) and the US Catfish Sustainability Program

The Certification Body (CB) for the US Catfish Sustainability Program is the USDA Processed Verified Program (USDA-PVP). This is the only Certification Body approved for the CFA program. The choice of Certification Body for this program was made because the USDA-PVP is a US federal agency program that is entirely independent and separated from trade associations such as the Catfish Farmers of America. This high degree of separation between CFA and the federal government USDA-PVP program makes it independent of CFA, thereby infusing a high degree of integrity and rigor into the auditing program selected for the CFA scheme. Since USDA-PVP is a federal government agency program, CFA has no influence over the auditors or the auditing program.

For CFA to access the USDA-PVP auditing program, CFA was required to apply to USDA-PVP to request that their scheme be audited by USDA-PVP. The draft standard went through four separate reviews and revisions (See timeline of approval; Figure 1). The review of the draft standard by USDA-PVP was based on its assessment as to whether the claims made were verifiable, repeatable, auditable, feasible, and factual, as required for participation in the PVP program (USDA-QAD 1000, 2023).

Once the Standard was approved, catfish processing companies were then able to apply to USDA-PVP to request inclusion into their auditing program. It is the USDA-PVP that makes the determination as to whether processing companies can claim to be certified under the US Catfish Sustainability Program. That determination depends entirely and exclusively on the outcome of the USDA-PVP audits. USDA-PVP auditors are professional, trained auditors who are totally independent of CFA.

In the US Catfish Sustainability Program, it is the USDA-PVP auditors, not CFA, who identify non-conformances, specify corrective action, and verify that the required corrective actions have been completed satisfactorily. Reliance on the professionally trained USDA-PVP auditors for these critical elements of the program adds distance between CFA and its certifying body that

reduces the potential for conflicts of interest and enhances the rigor and integrity of the US Catfish Sustainability Program.

Description of the Certification Body (USDA Process Verified Program)

The Process Verified Program (PVP) is a governmental program authorized in the Code of Federal Regulations (CFR) Title 7, Part 62. The USDA-PVP program only accepts inclusion of standards that undergo review and approval through the review process of the PVP program (QAD 1115 Procedure). The USDA-PVP program has full-time professionally trained auditors (QAD 1205; 1250) on staff who conduct the desk and annual on-site audits of catfish processors, growout farms, hatcheries, and feed mills. The audits conducted verify compliance or non-conformance of the participating catfish processors and their supply chain partners against the Standard. The USDA-PVP program operates under the international ISO 19011 guidelines for quality and/or environmental management systems auditing.

Guidance for interpretation of the standard

The report developed by the USDA-PVP auditors following each annual on-site audit includes all audit findings and includes specification of any non-conformances (major and minor), continuous improvement points, and recommendations, as per the QAD 1000 procedure. All findings are discussed with the entity being audited at the conclusion of the on-site audit.

Non-conformances are classified as either major or minor. A major non-conformance is the absence of a requirement of the standard or a complete breakdown of the required quality management system. A minor non-conformance is a finding that does not compromise the integrity of the program and generally consists of isolated incidences. If not corrected or addressed in a timely fashion, a minor non-conformance can be upgraded to a major non-conformance.

Continuous improvement points (CIPs) are developed from observations of specific areas for which opportunities for improvement have been identified by the auditors. CIPs are not non-conformances, but if not corrected or addressed in the spirit of continuous improvement, can become non-conformances.

Non-compliance is determined by careful review of the business's Quality Management System Manual and examination of the USDA-PVP records. The records of the USDA-PVP program must demonstrate that the Quality Management System is being adhered to. If there is no evidence in the records of adherence to specific Quality Management System provisions, the result is a decision of non-conformance. If there are only a few isolated incidences of records not providing evidence of adherence to the Quality Management System, the result is a decision of minor non-conformance. The corrective actions specified in the audit report are specific to the non-conformances identified and explicitly explain the steps that must be taken to correct those non-conformances.

Internal assessments and methodologies used within the US Catfish Sustainability Program

The Standards Committee is responsible for oversight of the US Catfish Sustainability Program, including internal assessments. The CFA internal assessment consists primarily of its annual report to the CFA Board of Directors. The annual report includes: the number of businesses approved by USDA-PVP to participate in the program, the number of desk audits of new applicants to USDA-PVP, the number of on-site audits disaggregated between initial and annual renewal audits, list of non-conformances identified disaggregated into major and minor categories, the continuous improvement points identified by auditors, and the recommendations made. The Standards Committee reviews the report and makes recommendations as to the need to consider modifications or revisions in the future.

The Standards Committee is also the conduit for input from stakeholders to USDA-PVP during the certification process. The Standards Committee has mechanisms in place to receive input and responses from stakeholders and communicates that input to the USDA-PVP Program Manager. If the need arises, the Standards Committee will convene a virtual conference call of stakeholder representatives with USDA-PVP program staff.

The methodology to assess compliance with the standard is established by the USDA-PVP program, not CFA, in accord with the independence and separation of CFA from USDA-PVP. The only certification body used for the PVP program is the USDA-PVP auditing system because of the clear, consistent methodology and training of its professional auditors. Thus, there is no possibility of inconsistency between or among certification bodies.

Program suspensions

Failure to address any program requirement, audit finding of major non-conformance, provide corrective actions in the timeframe specified by the auditors, persistent failure to abide by the USDA-QAD policies and procedures, or failure to pay required fees will result in suspension of the program for that company. Details are available in Section 15, “Program Suspension”, of the QAD 1000 Procedure (USDA-QAD 1000, 2023). The USDA-PVP program staff will notify the CFA Standards Committee of any program suspensions.

Audits, frequency, and sampling methodology

The USDA-PVP Program requires an initial on-site audit (following a desk audit) by the USDA-PVP, then annual audits unless non-conformances are uncovered that would trigger more frequent audits. USDA-PVP Procedure, Section 7, specifies the Audit Frequency and details. GU 5186 CCA (USDA-QAD, 2019), QAD General Requirements for QAD Auditors, USDA-Quality Assessment Division specifies that audits be scheduled two weeks in advance (to ensure that the individual in charge of the program is available). Audits are typically scheduled within a window of 15 to 30 days. All participating businesses are subject to unannounced audits as per Section 20.2 of the QAD 1000 Procedure (USDA-QAD 1000, 2023). The length of time for the audit depends upon the complexity of the business (i.e., the number of farms, hatcheries, feed mills included in the processor’s supply chain) and the distance between these entities. Most on-site audits take from 4 to 6 hours to check everything that is required to be checked, but audits of

greater numbers of sites located at greater distances require more time. USDA-PVP auditors spend the time necessary to thoroughly review performance.

The initial onsite audit occurs after a new program applicant receives a satisfactory desk audit. A surveillance audit, also conducted onsite, is conducted within 6 months of the initial on-site audit. The onsite annual renewal audit is conducted for all program participants. If an audit reveals a major non-conformance or if there are numerous minor non-conformances, more frequent audits may be conducted at the participant's expense. Auditors reserve the right to conduct unannounced audits if there is suspicion of wrongdoing, such as falsified records, mis-branded product, or other misdeeds. Unannounced audits, if necessary, are conducted according to specifications of Section 20.2 of the QAD 1000 Procedure.

All participating catfish processing companies, and random samples of feed mills, hatcheries that supply feed and fingerlings, and growout farmers that supply fish to that processing company, are included in all on-site audits.

On-site audits are conducted according to requirements and procedures specified in ISO 19011:2018 (formerly 19011:2011) Section 6: "Conducting an audit." The US Catfish Sustainability Program does not allow for non-certified products. All products handled by the catfish processors approved in the program must meet the standards of the US Catfish Sustainability Program.

Multi-site certification

Multi-site catfish businesses are eligible for participation in the US Catfish Sustainability Program. For businesses that include all sites as a single business cost center, the multiple sites are considered as one site when establishing which entities are audited each year whereas companies that have separate business cost centers for multiple sites are considered as separate sites for auditing purposes. For a processing company with more than one processing site, the site that houses the individual responsible for administering the Catfish Sustainability Program will be the one visited, but the audit records must include those of the various other sites. All farms that supply fish to any of the processing sites are included in the pool to potentially be audited each year. Similarly, all feed mills and hatcheries that supply feed and fingerlings to growout farm suppliers to any of the processing sites of the company will be included in the overall pool from which a random sample will be audited in any given year.

Quality control and consistency of audit reports

The USDA-PVP program uses standardized reporting formats for all audits of the CFA PVP program. The professional auditors hired in the USDA-PVP program undergo multi-year training in reporting practices and formats as defined in USDA-QAD 1255 documents. The USDA-PVP is the only Certification Body used in the CFA PVP program; thus, there is no opportunity for inconsistencies among or between certification bodies in the US Catfish Sustainability Program. The performance evaluation program in place for USDA-PVP auditors provides the oversight of consistency among auditors.

The majority of US catfish farmers, those eligible for participation in the Catfish Sustainability Program, are located in the 4-state area served by the same USDA-PVP auditors. Making use of

the same auditors across all participating businesses further reduces the risk of introduction of inconsistencies in auditing practices and reporting.

USDA-QAD rules, similar to all notices proposed and final rules promulgated by federal agencies, undergo public comment periods through the Federal Register with a CFR designation. Examples of current proposed rules open for public comment are available at: <https://www.federalregister.gov/>.

Auditor qualifications, training, continuous professional development

Auditors used in the US Catfish Sustainability Program must be those hired by the USDA-PVP program according to the qualifications and competence criteria as specified in the USDA-QAD 1205 and 1250 Procedures (USDA-QAD 1205; 1250, 2019), USDA Processed Verified Program Auditor Qualifications, and Auditor, Technical Expert, and Program Review Committee Member. These documents are publicly available (<https://www.ams.usda.gov/services/auditing/process-verified-programs>). The independence of the auditors that conduct the audits of the catfish businesses in the US Catfish Sustainability Program provides the rigor and integrity of the program. The 2-year training program includes an “auditor-in-training” phase that provides for a cadre of professional auditors. The USDA-QAD requires continuous professional development of auditors, including not only the USDA-QAD training but also the RAB-accredited ISO 9001:2000 Lead Auditor Training, and that auditors maintain American Society for Quality Control’s Certified Quality Auditor credentials as specified in USDA-QAD 1205, available at <https://www.ams.usda.gov/services/auditing/process-verified-programs>).

Required qualifications of auditors in the USDA-PVP program include two phases of qualification. The fundamental requirements that must be met include: personal attributes of importance in the performance of auditing responsibilities (ethical, open-minded, diplomatic, observant, perceptive, versatile, tenacious, decisive, self-reliant, acts with fortitude, open to improvement, culturally sensitive, and collaborative), high school diploma or equivalent plus 3 years of post-high school education or experience in an agricultural-related field (farm experience, commodity grading, agricultural marketing, food processing laboratory testing, quality assurance, process control application, process or systems auditing, ISO standards application), effective oral and writing communication skills, have successfully completed an approved course for ISO 19011:2018 Section 4 Principles of Auditing and Section 6 Conducting an Audit, and have successfully completed the training for the program as defined by USDA-QAD (USDA-QAD 1250 Procedure, 2019).

Upon successful completion of the phase-one training elements, the individual may move to the second phase of training, as an “Auditor-in-training.” To become qualified as an auditor, the auditor-in-training must complete the following requirements: demonstrate the ability to manage and coordinate audits and/or assessment, successfully complete an RAB-accredited ISO 9000:2000 Lead Auditor Training Course, participate in a minimum of three complete audits or assessments under the supervision of an evaluator (a “complete audit” consists of one which evaluates the entire program or system), and have a Form 1255A auditor evaluation form rating of at least “Marginally successful”, and be recommended by the evaluator as an Auditor.

Continuous professional development is required for each auditor and includes maintaining their credentials as a Certified Quality Auditor by the American Society for Quality Control. In addition, each auditor must participate in five complete audits or auditing for a combined total of 10 days and earning at least 1 acceptable annual evaluation (USDA-QAD 1205, 2019).

Traceability

Traceability is required for the US Catfish Sustainability Program. The application process for each entity that applies for inclusion to the USDA-PVP program includes the requirement that each entity develop a specific set of procedures for traceability and Chain of Custody. The USDA-PVP program details these requirements in the USDA-QAD 1000 Procedure (USDA-QAD 1000, 2023). The audits performed by the USDA-PVP auditors verify, through the annual on-site audits, that the participant has adhered to the procedures as outlined in their required Quality Management System Manual.

In addition, the US catfish industry, including all businesses within the scope of the US Catfish Sustainability Program, by law, must conform to the requirements of the USDA-Food Safety and Inspection Service (USDA-FSIS) requirements that include explicit and detailed requirements for traceability of all products produced in US catfish processing facilities as part of the mandatory Recall Plan (USDA-FSIS 2015; 2017). The traceability records to be maintained by every US catfish processing company are those necessary for a recall of unsafe product. These are delineated in the Recall Plan required for all US catfish processors. The same records required for meat and poultry products are required for US catfish products. The records required include invoices, bills of sale, shipping documents from each transaction in which product is purchased, sold, shipped, received, or handled. These include production records that include ingredients used, production logs, supplier lot identification, finished product lot and subplot identification, and any test results with raw materials or finished product, and distribution records that include names and addresses of consignees, shipment method, date of shipment, and the amount of product shipped to each consignee. Not only are US catfish processing facilities required to maintain detailed records on traceability, USDA-FSIS requires that a USDA-FSIS inspector be present at all times that the processing facility is processing catfish.

The Quality Management System Manual required for acceptance in the USDA-PVP Program requires specification of a Traceability Procedure in Section 9.5, along with required documentation and control of traceability documents. As a required component of the Quality Management System that underpins the USDA-PVP program, each audit conducted explicitly verifies adequate chain of custody performance and identification of any breaches of the chain of custody. Records must be retained for at least one year for refrigerated product and at least two years for shelf-stable products, consistent with requirements of the USDA Food Safety and Inspection Service.

The US Catfish Sustainability Program does not allow for non-certified products. All products handled by the catfish processors approved in the program must meet the standards of the Catfish Sustainability Program.

Transparency

The US Catfish Sustainability Program is designed to provide greater accountability to program stakeholders, buyers, and the public. Companies approved by USDA-PVP for participation in the program are listed on the USDA-PVP website (<https://www.ams.usda.gov/sites/default/files/media/Official%20ListingPVP.pdf>). The mechanism to apply for the program is described on the USDA-PVP website (<https://www.ams.usda.gov/services/auditing/process-verified-programs>).

Comments received by USDA-PVP are provided to the Chair of the Standards Committee to include in the Public Comment Log and Response Form or the Complaint Log and Response Form. Summaries are provided in the annual reports submitted to the CFA Standards Committee and are considered when reviewing and revising the Standard. Summaries of responses and specific revisions made to the Standard or to the Quality Manual and Operating Procedures document are included in the preamble to each revision of the Standard.

Fee Structure

The USDA-PVP Program is a user-fee program. The fees for service are the responsibility of the applicant requesting service. The USDA-PVP fees are paid by the processing companies, not individual farmers, hatcheries, or feed mills.

Fees are charged according to the approved hourly rate published on the AMS website at <https://www.ams.usda.gov/services/grading/fees>. Fees include: a) audit preparation time required to review the approved program documentation and records from previous audits, and to prepare checklists; b) time spent to conduct the audit itself, including reporting results of the audit, and the corrective action audit, if corrective actions were identified; c) travel time and expenses to and from the assigned auditor's official duty location and the audit sites. When traveling to provide services to multiple applicants, charges will be prorated among applicants; d) time spent reviewing promotional materials that use the USDA-PVP shield on labels, packaging, and other marketing materials; and e) other expenses related to services provided to US Catfish Sustainability Program participants.

Document Control

The USDA-PVP Program has explicit and detailed requirements related to the Control of Documents. The application process for each entity that applies for inclusion in the USDA-PVP program includes the requirement that each entity develop a specific set of procedures related to document control. The USDA-PVP program details these requirements in the USDA-QAD 1000 Procedure (USDA-QAD 1000, 2023). These requirements include specification of where reports are maintained and filed, the annual internal audit required, and policies and procedures for document retention. The audits performed by the USDA-PVP auditors verify, through the annual on-site audits, that the participant has adhered to the procedures as outlined in their required Quality Management System Manual.

Accreditation Body (USDA – Quality Assessment Division)

Independence of the Accreditation Body (USDA-Quality Assessment Division) and the US Catfish Sustainability Program

The Accreditation Body for the US Farm-Raised Catfish Environmental Sustainability Certification Program is the USDA-Quality Assessment Division (USDA-QAD) of the US federal government. The USDA-QAD was established by US law to ensure the rigor and integrity of auditing services provided by the US government, and, hence, operates under federal government rules and procedures. Thus, the role of the QAD in the Catfish Sustainability Program is to monitor and assess the competence of PVP as the 3rd-party certifier of the US Catfish Sustainability Program.

The USDA-QAD is the only Accreditation Body used in the US Catfish Sustainability Program because it is subject to the many federal laws, policies, and procedures that apply to the many layers of oversight within the USDA and beyond USDA by the Office of the Inspector General (that also provides protection for whistle-blowers), the Executive Branch of US government (Presidential level), and additional scrutiny and oversight by the US Congress (House and Senate Committees) as part of the checks and balances built into the US federal government through its founding constitution. Thus, the Accreditation Body for the US Catfish Sustainability Program is the USDA-QAD, but the oversight does not end with the USDA-QAD. The USDA-PVP (CB) and the USDA-QAD (AB) are assessed, evaluated, and scrutinized on an on-going basis up through divisions, services, departments, and inspectors general of the US federal government.

The CFA, as an industry trade association, has no influence over the policies and procedures used by a federal entity, such as the USDA-QAD. The policies and procedures of the USDA-QAD are established and implemented based on the oversight and approval of higher levels within the US federal government and adhere to provisions of US federal laws and rules. Thus, the USDA-QAD is totally independent from the CFA and other industry groups and associations. CFA established the process points to be verified that were subsequently determined to be “verifiable, repeatable, auditable, feasible, and factual” as required by USDA-QAD (USDA-QAD, 2023).

Description of the Accreditation Body (USDA-Quality Assessment Division)

The USDA-QAD establishes and codifies the guidance and operating procedures of the various PVP and other auditing service programs at the federal level (USDA-QAD 1000, 2023). The USDA-QAD requires that the USDA-PVP programs (Certification Body for the Catfish Sustainability Program) adhere to the policies and procedures by the USDA-QAD.

The methodologies for the USDA-PVP established by the USDA-QAD are formal, approved, codified policies and procedures that must be followed, thus establishing a consistent methodology for auditing assessment of compliance for the US Catfish Sustainability Program.

Audits, frequency, consistency, and sampling methodology

The minimum audit duration is one year. For those businesses with no non-conformances, an annual renewal audit is required. The USDA-QAD 1000 Procedure, “Quality Systems Verification Programs General Policies and Procedures” Section 20, “Surveillance”, specifies that an annual, on-site is required for the Catfish Sustainability Program (USDA-QAD 1000, 2023).

The USDA-QAD establishes the necessary education, technical knowledge, and experience of the auditors based on the official, US government documents for ISO/IEX 17065 and the Quality Systems Verification Programs.

The CFA US Catfish Sustainability Program requires an initial on-site audit (following a desk audit) by the USDA-PVP, then annual audits unless non-conformances are uncovered that would trigger more frequent audits. USDA- PVP Procedure, Section 7, specifies Audit Frequency and details.

The initial onsite audit occurs after a new program applicant receives a satisfactory desk audit. A surveillance audit, also conducted onsite, is conducted within 6 months of the initial on-site audit. The onsite annual renewal audit is conducted for all program participants. If an audit reveals a major non-conformance or if there are numerous minor non-conformances, more frequent audits may be conducted at the participant’s expense.

All participating catfish processing companies, a random sample of feed mills and hatcheries that supply feed and fingerlings, respectively, to growout farm suppliers of the processor, and a random sample of growout farmers are included in all on-site audits.

The methodology to assess compliance with the standard is established by the USDA-QAD (Accreditation Body) that specifies requirements for compliance of the USDA-PVP program (USDA-QAD 1000, 2023). CFA is entirely independent of the USDA-QAD and USDA-PVP programs that are programs of the US federal government. The only certification body used for the PVP program is the USDA-PVP auditing system because of the clear, consistent methodology and training of its professional auditors specified and required by the USDA-QAD. This rigid structure based on US federal laws, rules, policies, and procedures ensures that consistent practices are followed.

Similarly, training and calibration of auditors is done by the professional auditors of the USDA-PVP, as per USDA-QAD 1205 and USDA-QAD 1250 so that audits are done in a consistent manner among auditors.

The USDA-PVP program uses standardized reporting formats for all audits of the CFA PVP program. The professional auditors hired in the USDA-PVP program undergo multi-year training in reporting practices and formats as defined in USDA-QAD 1255 documents. The USDA-PVP is the only Certification Body used in the CFA PVP program; thus, there is no opportunity for inconsistencies among or between certification bodies in the US Catfish Sustainability Program. The performance evaluation program in place for USDA-PVP auditors provides the oversight of consistency among auditors.

The majority of US catfish farmers, those eligible for participation in the US Catfish Sustainability Program, are located in the 4-state area served by the same USDA-PVP auditors. Making use of the same auditors across all participating businesses further reduces the risk of introduction of inconsistencies in auditing practices and reporting.

Auditor qualifications, training, and continuous professional development

The competency standards of the professional auditors of the USDA-PVP program are defined by the USDA-QAD (USDA-QAD 1205; 1250, 2019), not CFA, based on professional standards that include the Certified Quality Auditor credentials of the American Society for Quality Control. In addition, the USDA-QAD requires continuous professional development of auditors, including not only the USDA-QAD training but also the RAB-accredited ISO 9001:2000 Lead Auditor Training, and maintain the American Society for Quality Control's Certified Quality Auditor credentials as in USDA-QAD 1205, available at <https://www.ams.usda.gov/services/auditing/process-verified-programs>).

Required qualifications of auditors in the USDA-PVP program include two phases of qualification. The fundamental requirements that must be met first include: personal attributes of importance in the performance of auditing responsibilities (ethical, open-minded, diplomatic, observant, perceptive, versatile, tenacious, decisive, self-reliant, acts with fortitude, open to improvement, culturally sensitive, and collaborative), high school diploma or equivalent plus 3 years of post-high school education or experience in an agricultural related field (farm experience, commodity grading, agricultural marketing, food processing laboratory testing, quality assurance, process control application, process or systems auditing, ISO standards application), effective oral and writing communication skills, have successfully completed an approved course for ISO 19011:2018 Section 4 Principles of Auditing and Section 6 Conducting an Audit, and have successfully completed the training for the program as defined by USDA-QAD (USDA-QAD 1250, 2019).

Upon completion of the approved phase-one training elements, the individual may move to the second phase of training, as an "Auditor-in-training." To become qualified as an auditor, the auditor-in-training must complete the following requirements: demonstrate the ability to manage and coordinate audits and/or assessment, successfully complete an RAB-accredited ISO 9000:2000 Lead Auditor Training Course, participate in a minimum of three complete audits or assessments under the supervision of an evaluator (a "complete audit" consists of one which evaluates the entire program or system), and have Form 1255A auditor evaluation form rating of at least "Marginally successful" and be recommended by the evaluator as an Auditor.

Continuous professional development is required for each auditor and includes maintaining their credentials as a Certified Quality Auditor by the American Society for Quality Control. In addition, each auditor must participate in five complete audits or auditing for a combined total of 10 days and earning at least 1 acceptable annual evaluation (USDA-QAD 1205, 2019). In addition, each auditor must participate in five complete audits or auditing for a combined total of 10 days and earning at least 1 acceptable annual evaluation (USDA-QAD 1205, 2019).

On-site audits are conducted according to requirements and procedures specified in ISO 19011:2018 (formerly 19011:2011) Section 6: “Conducting an audit.” The length of each audit varies with the complexity of each facility being audited. In addition, the US Catfish Sustainability Program requires audits not just of the processing facility, but also of the growout farms that supply catfish to the processor, the hatchery farms that supply fingerlings to growout farms, and the feed mills that supply feed to growout and hatchery farms. Companies that purchase catfish from other states and farms located at greater distances from the processing facility will incur greater fees from the increased time and travel expense of the auditors. Thus, there is no minimum audit duration that might result in discriminatory un-necessary fees for smaller-scale facilities for which the audit may not be as time-consuming as for a much larger and more complex facility.

Program suspension

Failure to address any program requirement, audit finding of major non-conformance, provide corrective actions in the timeframe specified by the auditors, or persistent failure to abide by the USDA-QAD policies and procedures, or failure to pay required fees will result in suspension of the program. Details are available in Section 15, Program Suspension, of the QAD 1000 Procedure (USDA-QAD 1000, 2023).

Multi-site certification

The Quality Manual and Operating Procedures of the US Catfish Sustainability Program specifies that multi-site catfish businesses are eligible for participation in the US Catfish Sustainability Program. For businesses that include all sites as a single business cost center, the multiple sites are considered as one site when establishing which entities are audited each year. For a processing company with more than one processing site, the site that houses the individual responsible for administering the US Catfish Sustainability Program will be the one visited, but the audit records must include those of the various other sites. All farms that supply fish to any of the processing sites are included in the pool to potentially be audited each year. Similarly, all feed mills and hatcheries that supply feed and fingerlings to growout farm suppliers to any of the processing sites of the company will be included in the overall pool from which a random sample will be audited in any one year.

Public input and notifications

The program is available to all members of the Catfish Farmers of America who receive all communications from the association with their membership. Such communications include The Catfish Journal and email messages and notifications from the CFA office to the membership. Reports to the membership are also made at the annual Business Meeting of the Catfish Farmers of America in addition to reports provided to the Board of Directors of CFA. The Board includes representatives of the state-affiliated associations that further amplify communications through their newsletters and email correspondence network for their specific state. In the event of changes to the program, including revision of standards, all stakeholders are not only notified, but those participating directly in the Catfish Sustainability Program are notified that they will have 1 year to come into compliance with the revised standard.

Comments received by USDA-QAD are provided to the Chair of the Standards Committee to include in the Public Comment Log and Response Form or the Complaint Log and Response Form. Summaries are provided in the annual reports submitted to the CFA Standards Committee and are considered when reviewing and revising the Standard. Summaries of responses and specific revisions made to the Standard or to the Quality Manual and Operating Procedures document are included in the preamble to each revision of the Standard.

Traceability

The Quality Management System Manual required for acceptance in the USDA-PVP Program requires specification of a Traceability Procedure in Section 9.5, along with required documentation and control of traceability documents. As a required component of the Quality Management System that underpins the USDA-PVP program, each audit conducted explicitly verifies adequate chain of custody performance and includes notification of any breaches of the chain of custody. Records must be retained for at least one year for refrigerated product and at least two years for shelf-stable products, consistent with requirements of the USDA Food Safety and Inspection Service.

The US Catfish Sustainability Program does not allow for non-certified products. All products handled by the catfish processors approved in the program must meet the standards of the US Catfish Sustainability Program.

Transparency

The USDA-PVP (Certification Body) for the US Catfish Sustainability Program must approve any revisions of the standard. The USDA-QAD will be informed of revisions to the Standard. Since participants in the USDA-PVP Program have up to 1 year from the date of approval to come into compliance with changes in the standard, the USDA-PVP program similarly will have up to 1 year to train auditors with respect to the revisions. Since the scope of the USDA-PVP Program is the US and acknowledges and accounts for the regulatory laws and enforcement structures related to environmental sustainability, the Certification Body (USDA-PVP) and the Accreditation Body (USDA-QAD) are restricted to federal governmental agencies that are well versed in US laws and rules.

As a federal agency, the majority of the funding for the USDA-QAD that serves as the Accreditation Body is public funding from the US government. No private funding is used to support the Accreditation Body for the US Catfish Sustainability Program. The Certification Body, the USDA-PVP, is a fee-for service program with the fee structure delineated under the section on the role of the USDA-PVP as the Certification Body. The USDA-PVP fees are paid by the processing companies, not individual farmers, hatcheries, or feed mills.

The USDA-QAD (Accreditation Body) discloses information on its website of its structure and policy and procedures manuals as part of its transparency related to the oversight provided to the USDA-PVP Program. Detailed policies and procedures are available to the public on the USDA-QAD website that are available to the public at <https://www.ams.usda.gov/services/auditing>. A key to the oversight provided is the Program Review Committee that functions based on the

policies delineated in QAD 1115 Procedure for the ISO/IEC 17065 and Quality Systems Verification Programs.

The US Catfish Sustainability Program is designed to provide greater accountability to the program stakeholders, buyers, and the public. Companies approved by USDA-PVP for participation in the program are listed on the USDA-PVP website (<https://www.ams.usda.gov/sites/default/files/media/Official%20ListingPVP.pdf>).

Performance review

The USDA-QAD specifies the requirements for the USDA-PVP Program (Certification Body) through a series of formal policy and procedures documents (USDA-QAD 1000, 2023). The USDA-QAD guidance includes a Program Review Committee that has final authority over ISO/IEC17065 and Process Verified Programs (Figure 4: Chain of command above the USDA-QAD).

Corrective action audits

The USDA-PVP (Certification Body) requires a followup on-site audit if non-conformances are identified and corrective actions specified. Such a follow-up on-site audit would occur well before the annual renewal audit. Specifically, Section 12 of QAD 1000 Policies and Procedures states that, “Applicants must address all non-conformances and respond to all requests for corrective actions and corrections, as applicable, within the time frame specified in the audit report. Written corrective action responses must be submitted in hard copy or electronic form that identify the cause(s) of the non-conformance, determine the necessary corrective action, and implement the corrective actions. If the non-conformance resulted in the use or delivery of non-conforming product, the applicant must identify the non-conforming product and make correction appropriate to the non-conformance.

USDA-PVP auditors then perform a corrective action audit according to the policies and procedures specified in Section 13 of QAD 1000 Policies and Procedures to determine whether the responses by the catfish company were sufficient to have addressed the non-conformance. If not sufficient, additional action is required.

USDA-QAD has a formal, written Appeals Process (Section 25 of QAD 1000 Procedure; USDA-QAD 1000, 2023) in the event that the catfish business disagrees with either an initial audit finding or a finding from a correction action audit.

Monitoring & evaluation system

The Monitoring and Evaluation System used by the Catfish Farmers of America for the US Catfish Sustainability Program includes a set of performance indicators that are tabulated annually as part of an Annual Management Review of the Catfish Sustainability Program by the CFA Standards Committee. Results are summarized in the Annual Report presented to the CFA Board of Directors each year. The process points specified in the Standard are the measures of compliance with the objectives of the Standard. The performance indicators used to evaluate the effectiveness of the Catfish Sustainability Program focus on the number of businesses that have

been approved to participate in the program, the numbers of businesses found to be in compliance, and the number of non-conformances identified in the audits.

Notification of management changes by CFA to USDA-PVP (Certification Body) and USDA-QAD (Accreditation Body) and stakeholders

Changes in management of the US Catfish Sustainability Program are communicated promptly (within 30 days) to all stakeholders (processors participating in the CFA PVP for further notification of their supply chain partners), to the Certification Body (USDA-PVP), and to the Accreditation Body (USDA-QAD).

Performance indicators

The performance indicators used as the basis for monitoring and evaluation by CFA of the CFA-PVP program are listed in Table 1. Tracking the number of businesses approved by USDA-PVP to participate in the program will demonstrate utilization of the program by stakeholders. Tracking the number of desk audits of new applicants to USDA-PVP and surveillance (6-month) audits will provide verification for the listings of participation on the USDA-PVP website with the required approval process. Tracking the numbers of annual renewal audits will verify that the auditing process of businesses continuing in the business is being performed as specified. It is important for the Standards Committee to be informed of non-conformances identified in the audits, both major and minor, to identify whether training programs or other assistance is necessary to stakeholders participating in the program. The tracking of continuous improvement points and recommendations from the audits will provide a useful basis for decisions made on whether revisions are needed to the Standard and what types of revisions might be needed in the future. Continuous improvement points and recommendations from the audits will be compared with the objectives of the Standard to ensure that criteria contribute to the defined objectives of the program.

The US Catfish Sustainability Program embeds compliance with local, state, and federal regulations within the standard. Moreover, the oversight of the US Catfish Sustainability Program by the CFA Board of Directors through its Standards Committee, ensures that local conditions are considered. This is because the Standards Committee includes stakeholders that represent various states and supply chain partner categories and the CFA Board includes explicit representation from the states where the majority of US catfish farming businesses are located as well as representatives of multiple supply chain levels.

Annual management review

The U.S. Catfish Sustainability Program Standards Committee conducts an annual management review, based on the performance indicators listed above and in Tables 1 and 2. The scheme performance is measured by the number of businesses (processors, growout farms, hatcheries, and feed mills) that actively participate and are audited each year, along with the numbers of major and minor non-conformances. These indicators primarily assess the performance of the US Catfish Sustainability Program. The Certification Body (USDA-PVP) undergoes continuous review of its management as dictated by federal policies. Similarly, the Accreditation Body

(USDA-QAD), also a federal government entity, is reviewed on an on-going, continuing basis as dictated by federal policies and procedures. Results of the annual management review are summarized in the annual report submitted to the CFA Board of Directors.

Annual report to the CFA Board of Directors

The Standards Committee prepares an annual report on the U.S. Catfish Sustainability Program that is submitted to the Executive Vice President, to the Executive Committee, and then to the CFA Board of Directors. The annual report includes a brief description of the development of the program, recent activities, outcomes, and impacts.

A summary of the annual management review of the U.S. Catfish Sustainability Program is included in the annual report. The overall performance of the U.S. Catfish Sustainability Program is summarized in the performance indicators listed in Table 1 that include the number of businesses approved by USDA-PVP to participate in the program, the number of desk audits of new applicants to USDA-PVP, and the number of on-site audits disaggregated between initial and annual audits. The performance analysis includes lists of non-conformances identified by auditors. The non-conformances are disaggregated into the categories of major and minor non-conformances. Any continuous improvement points identified by auditors, and recommendations made by auditors are also listed in Table 2. Any comments submitted by stakeholders or others as part of a public comment period or at other times are summarized in the annual management review. The report includes any recommendations from the Standards Committee that may need to be considered for future modifications or revisions of the Standard and to the program. The report is made available to parties that have submitted comments.

Transparency

The U.S. Catfish Sustainability Program is designed to provide greater accountability to the program stakeholders, buyers, and the public. Companies approved by USDA-PVP for participation in the program are listed on the USDA-PVP website (<https://www.ams.usda.gov/sites/default/files/media/Official%20ListingPVP.pdf>). The mechanism to apply for the program is described on the USDA-PVP website (<https://www.ams.usda.gov/services/auditing/process-verified-programs>). Given the geographic scope of the U.S. Catfish Sustainability Program to the US, all materials are provided in English, the national language of the US.

The program is available to all members of the Catfish Farmers of America who receive communications from the association as part of their membership. Such communications include The Catfish Journal and email messages and notifications from the CFA office to the membership. Reports to the membership are also made at the annual Business Meeting of the Catfish Farmers of America in addition to reports provided to the Board of Directors of CFA. The Board includes representatives of the state-affiliated associations that further amplify communications through their newsletters and email correspondence network for their specific state. In the event of changes to the program, including revision of standards, all stakeholders are not only notified, but those participating directly in the Catfish Sustainability Program are notified that they will have 1 year to come into compliance with the revised standard.

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Tables

Table 1. Performance Indicators for the Catfish PVP Program reported in each annual report.

Performance indicator	Number
Number of businesses approved by USDA-PVP to participate in the program	
Processors (no.)	
Farms (no.)	
Feed mills (no.)	
Hatcheries (no.)	
Number of desk audits, new applicants to USDA-PVP, in last year (no.)	
Number of on-site audits	
Initial audits (no.)	
Surveillance audit (no.)	
Renewal annual audits (no.)	

Table 2. Non-conformances, continuous improvement points identified, and recommendations made by auditors reported in annual report.

Non-conformances		Continuous improvement points	Recommendations made
Major	Minor		

Figures

Figure 1. Timeline of development of the U.S. Farm-Raised Catfish Environmental Sustainability Program

Timeline of Development of the U.S. Farm-Raised Catfish Environmental Sustainability Certification Program

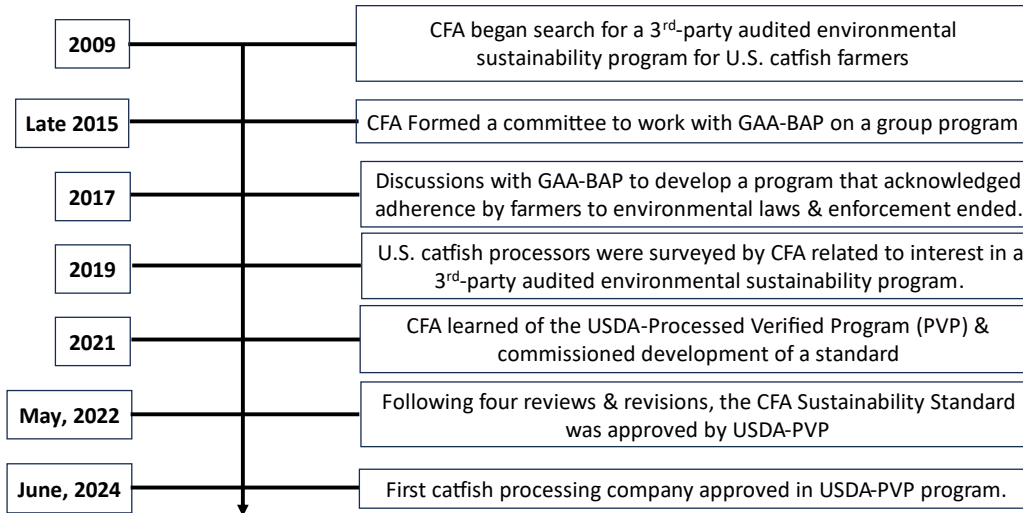


Figure 2. Organizational Chart of the Catfish Farmers of America

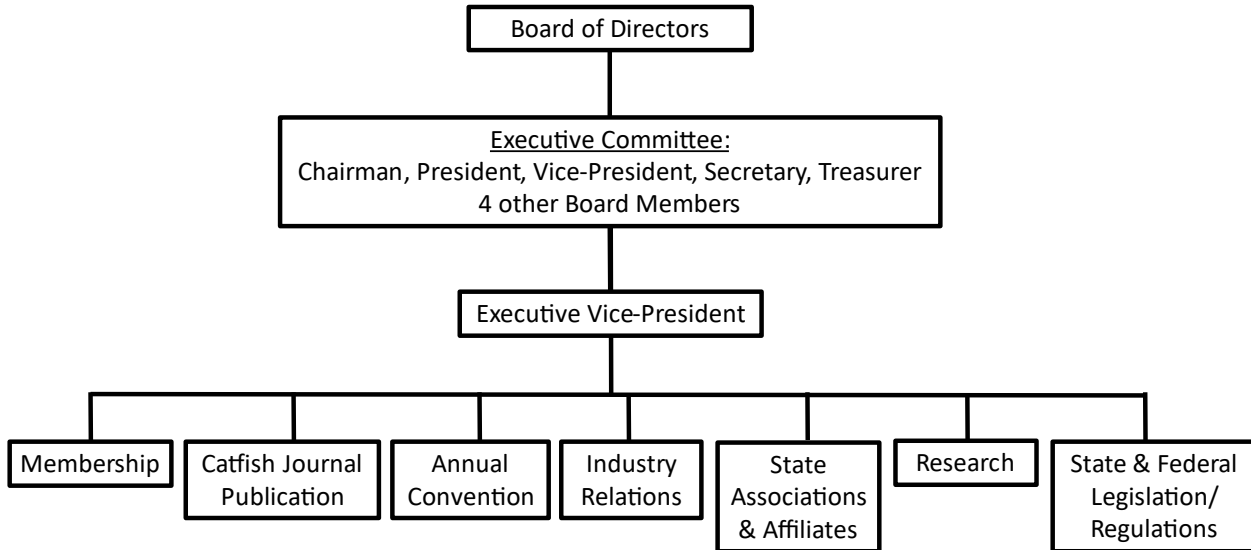


Figure 3. Organization of the U.S. Farm-Raised Catfish Environmental Sustainability Certification Program (US Catfish Sustainability Program)

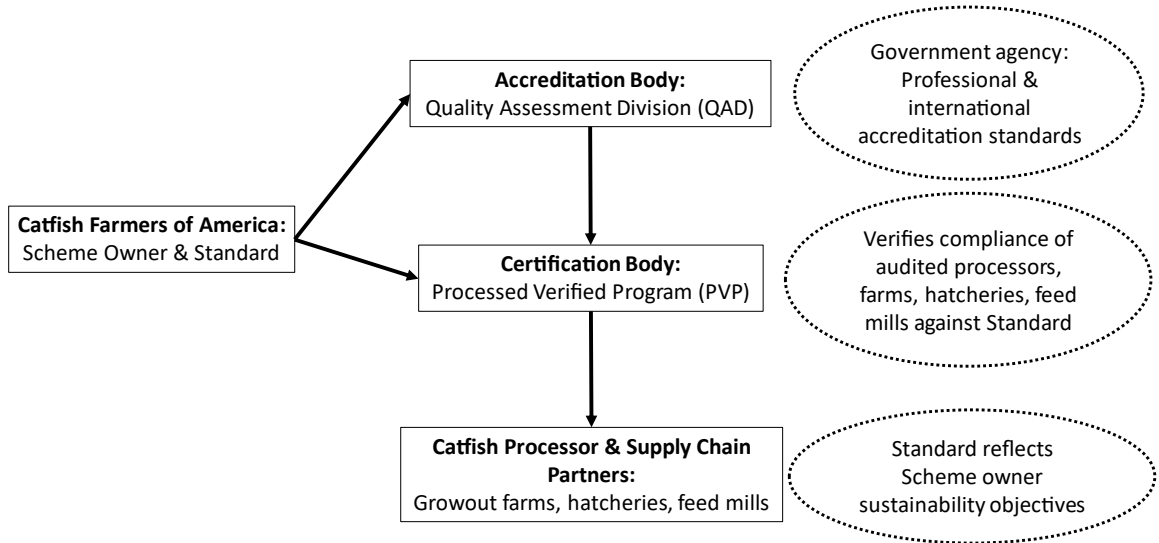
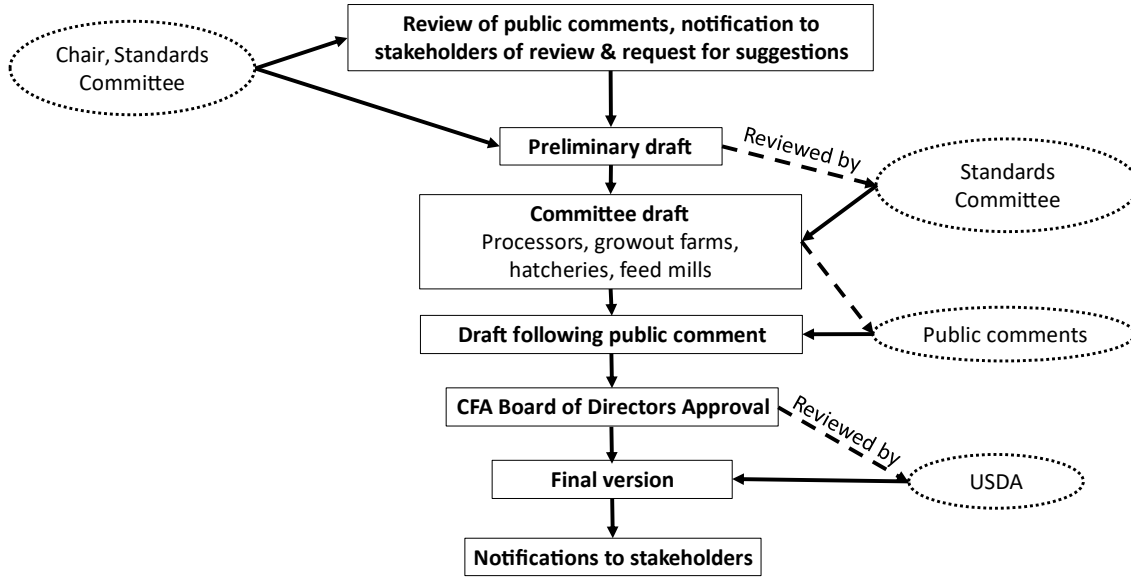


Figure 4. Standard-setting process for development and revision of the U.S. Farm-Raised Catfish Environmental Sustainability Certification Program Standard



Appendices

- A. Standard: US Farm-Raised Catfish Environmental Sustainability Certification Program
- B. Templates for document control
 - a. Outline of Annual Report
 - b. Complaint Log and Response form
 - c. Public Comment Log and Response Form
 - d. Request for Additional Information on US Catfish Sustainability Program
- C. Additional resources

APPENDIX A

US Farm-Raised Catfish Environmental Sustainability Certification Program Standard



Document Title	US Farm-Raised Catfish Environmental Sustainability Certification Program Standard
Revision Number	Version 3.1
Technical Committee Approval Date	January 21, 2025

U.S. Farm-Raised Catfish Environmental Sustainability Certification Program

The U.S. catfish industry is committed to producing the highest-quality products in an environmentally responsible manner. However, there is no existing quality management system for environmental sustainability for U.S. catfish farms. In the United States, some components of environmental sustainability as related to catfish farming are regulated, but others are not. Yet customers of catfish farms and processors increasingly are asking for verification that U.S. catfish is raised in an environmentally sustainable manner.

The U.S. Farm-Raised Catfish Environmental Sustainability Certification Program will result in the development of a quality management system for U.S. catfish production that is being specifically requested by customers and that will convey specific information to consumers regarding the environmental sustainability of U.S. catfish. The specific process points to be verified are those components of environmental sustainability that are not regulated. These include:

1. Fishmeal and fish oil conservation
2. Protection of wild fish stocks by using only domesticated, farm-raised fry and fingerlings.

The U.S. Farm-Raised Catfish Environmental Sustainability Certification Program acknowledges that U.S. laws and regulations provide assurance that U.S. catfish farmers conform to the following:

1. Adherence to the USEPA Effluent Limitation Guidelines (USEPA 2004a, b, c, d; 2006);
2. Adherence to EPA spill prevention and control as related to farm supplies and wastes (USEPA 2020a);
3. Adherence to EPA laws and regulations as related to chemical handling (USEPA 2020b).
4. Management of fish-eating birds according to the U.S. Fish and Wildlife Service permitting requirements (USDA-APHIS-Wildlife Service 2020).
5. Critical habitat under the Endangered Species Act (U.S. Fish and Wildlife Service 2020).

The U.S. Farm-Raised Catfish Environmental Sustainability Certification Program standard for catfish production provides clear definitions for responsible environmental stewardship for catfish producers who choose to further reduce environmental impacts, improve management practices, and provide greater accountability to their buyers and the public. The program will require that

individual farms develop a quality management system for environmental sustainability.

The Process Verified Points included in the U.S. Farm-Raised Catfish Environmental Sustainability Certification Program are those for which no regulations or quality management system criteria are currently in place for U.S. catfish. The process verified points conform to Items 6.3.b (“production and/or handling practice that provides specific information to consumers to enable them to make informed decisions on the products that they buy”) and 6.3.e (“characteristic, practice, or requirement that is specifically requested by a customer or consumer”) of the QAD 1001 Procedure of the USDA Process Verified Procedure.

U.S. Farm-Raised Catfish Environmental Sustainability Certification Program

Standard for Catfish Production

Overview

Responsible environmental management of farms has become increasingly important to consumers, farmers, and the general public. The U.S. Farm-Raised Catfish Environmental Sustainability Standard for Catfish Production provides clear and auditable definitions of management practices that reduce environmental impacts from catfish production while improving husbandry practices and health of the catfish raised.

Scope

Conformance to the provisions described below (summarized in Table 1) certifies the production and processing of U.S. catfish.

Definition of Terms

Catfish. All fish of the family Ictaluridae, 9 CFR 541.7(d)(2).

Fingerling. A size category including young fish, larger than a fry but not an adult (definition from USDA NASS, 2019).

Broodstock. These are fish or other stock kept for reproduction, including males. Female broodfish produce the fertilized eggs which go to hatcheries (definition from USDA NASS, 2019).

Foodsize. A size category including grown aquaculture products ready for market, also known as market size (definition from USDA NASS, 2019).

Fry. A size category including very young post-larval fish (definition from USDA NASS, 2019).

Ponds. The most common type of water facility for raising fish. Most ponds are man-made and fish usually have access to the entire pond (definition from USDA NASS, 2019).

Processors. Companies that convert live fish to a product ready to cook, such as fish fillets. Usually, the purchasing plant has no ties to the producer. However, in some cases, the plant may be a cooperative that is jointly owned by the producer and other producers. Also included in this category are the sales of aquaculture products by vertically integrated operations through their own processing and marketing operations (definition from USDA NASS, 2019).

Static, closed production system. Static production systems are those for which there is no continuous flow through of water and discharge from the production unit. In static ponds, the water is maintained with only infrequent additions or discharges (USEPA 2004c; pp. 4-18;5-2).

Stockers. A size category including young aquaculture species that are large enough to be placed in the final grow out to foodsize (definition from USDA NASS, 2019).

Catfish Processor Standard: Process Verified Points

Fishmeal and Fish Oil Conservation

Processors will require that farmers provide copies of the signed statement from feed mill(s) specifying the percent of wild fishmeal and fish oil used in the feeds for the past year prior to purchase of fish.

Use of Fry or Fingerlings from the Wild

Processors will require that farmers provide copies of signed statements from vendors who supply fry and fingerlings to growout farms that the fish sold were raised on farms and not captured from the wild.

Catfish Farm Standard: Process Verified Points

Fishmeal and Fish Oil Conservation

Background: Excessive use of fishmeal and fish oil in fish feeds can contribute to over-fishing, often of marine forage fish that contribute to marine food chains.

Standard: The feed fed contains less than 5% wild fish meal and fish oil.

For compliance: The farm will obtain annually a signed statement from the feed mill(s) that specifies the percent of wild fish meal and fish oil used in the feeds for the past year.

Relevant information: Global overview on the use of fish meal and fish oil in industrially compounded aquafeeds: Trends and future prospects (Tacon and Metian. 2008); Composition and formulation of channel catfish feeds (Robinson and Li 2012).

Use of Fry or Fingerlings from the Wild

Background: Use of wild fry, or fingerlings that can result in depletion of natural populations of wild fish.

Standard: All fish used for growout on the farm were obtained from domestic stocks raised on farms and hatcheries. All fry and fingerlings grown have been raised on farm or on a hatchery that supplies the farm with fingerlings for stocking.

For compliance: A letter will be provided by the vendor certifying the origin of fry or fingerlings from the vendor. The certification letter will be updated each year as part of the quality management system.

Relevant information: Sadovy de Mitcheson, Y and M. Liu. 2008. Environmental and biodiversity impacts of capture-based aquaculture. In A. Lovatelli and P.F. Holthus (eds). Capture-based aquaculture. Global overview. *FAO Fisheries Technical Paper*. No. 508. Rome, FAO. pp. 5–39.

Requirements for Participation in the U.S. Farm-Raised Catfish Environmental Sustainability Certification Program

Quality Management System

Participation in the program requires the development and maintenance of a Quality Management System. The company applying for participation in the USDA-AMS-PVP U.S. Farm-Raised Catfish Environmental Sustainability Certification Program must develop a Manual that describes and establishes the details of the Quality Management System. The Manual developed will be based on the QAD 1001 Procedure of the USDA Process Verified Program.

The Quality Management System Manual will specify the supply chain partners involved in the program and will include the agreements signed for participation in the USDA-AMS-PVP U.S. Farm-Raised Catfish Environmental Sustainability Certification Management System.

Agreements Among Supply Chain Partners

Application for participation in the USDA-AMS-PVP U.S. Farm-Raised Catfish Environmental Sustainability Certification Program will include agreements established between the applicant and their supply chain partners. Agreements to be signed will include:

1. Modification of purchasing agreements with farms to include:
 - a. Commitment to comply with the Standards of the U.S. Farm-Raised Catfish

- Environmental Sustainability Certification Program.
- b. Agreement to be audited by USDA-AMS.
2. Signed agreement (Attachment A to this Standard) with all hatcheries that supply fish to participating farmers that specifies:
 - a. Commitment to comply with the Standards of the U.S. Farm-Raised Catfish Environmental Sustainability Certification Program.
 - b. Agreement to be audited by USDA-AMS.
 3. Signed agreement (Attachment B to this Standard) with all feed mills that supply feed to participating farmers that specifies:
 - a. Commitment to comply with the Standards of the U.S. Farm-Raised Catfish Environmental Sustainability Certification Program.
 - b. Agreement to be audited by USDA-AMS.

Table 1. U.S. Farm-Raised Catfish Environmental Sustainability Standard – Summary

Process Verified Points	Standard	Compliance record-keeping
<i>Catfish Processor</i>		
1. Fishmeal and fish oil conservation	The feed fed contains less than 5% wild fish meal and fish oil.	Processors maintains copies provided by farmers of the signed statement from feed mill(s) specifying the percent of wild fishmeal and fish oil used in the feeds for the past year prior to purchase of fish.
2. Use of fry or fingerlings from the wild	All fish used for growout on the farm are from captive, domestic stocks raised on farms and hatcheries.	Processor maintains copies provided by farmers of the signed statements from fry and fingerling suppliers of the origin of the fish sold.
<i>Catfish Farm</i>		
1. Fishmeal and fish oil conservation	The feed fed contains less than 5% wild fish meal and fish oil.	The farm will obtain annually a signed statement from the feed mill(s) that specifies the percent of wild fish meal and fish oil used in the feeds for the past year.
2. Use of fry or fingerlings from the wild	All fish used for growout on the farm are from domestic stocks raised on farms and hatcheries. All fry and fingerlings grown have been raised on farm or on a hatchery that supplies the farm with fingerlings for stocking.	A letter will be provided by the vendor certifying the origin of fry or fingerlings from the vendor. The certification letter will be updated each year as part of the quality management system.

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Agreement A

Agreement with Hatcheries for Participation in the USDA-AMS-PVP U.S. Farm-Raised Catfish Environmental Sustainability Certification Program

THIS AGREEMENT (the “Agreement”) made and entered into this _____ day of _____, _____ (“the Execution Date”).

BETWEEN: _____ (“Hatchery”) and

BACKGROUND:

- A. The partners wish to associate themselves for purposes of participating in the USDA-AMS-PVP U.S. Farm-Raised Catfish Environmental Sustainability Certification Program.
- B. This agreement sets out the terms and conditions of participation in the USDA-AMS-PVP U.S. Farm-Raised Catfish Environmental Sustainability Certification Program

TERMS AND CONDITIONS:

- A. Hatchery agrees to take necessary steps to conform to the standards of the USDA-AMS-PVP U.S. Farm-Raised Catfish Environmental Sustainability Certification Program, including:
 - 1. Provide a signed statement annually to each farm participating in the USDA-AMS-PVP U.S. Farm-Raised Catfish Environmental Sustainability Certification Program specifying that the fingerlings/fry sold farms participating in the USDA-AMS-PVP U.S. Farm-Raised Catfish Environmental Sustainability Certification Program were farm-raised and not caught from the wild.
- B. Hatchery agrees to be audited by the USDA-AMS for purposes of the U.S. Farm-Raised Catfish Environmental Sustainability Certification Program.

IN WITNESS WHEREOF, the parties have duly affixed their signatures under hand and seal this _____ day of _____.

_____	_____	_____	_____
Title	Date	Title	Date
Printed name: _____	_____	_____	_____

Agreement B
Agreement with Hatcheries for Participation in the USDA-AMS-PVP U.S. Farm-Raised Catfish Environmental Sustainability Certification Program

THIS AGREEMENT (the “Agreement”) made and entered into this _____ day of _____, _____ (“the Execution Date”).

BETWEEN: _____ (“Feed Mill”) and

BACKGROUND:

- A. The signatories wish to associate themselves for purposes of participating in the USDA-AMS-PVP U.S. Farm-Raised Catfish Environmental Sustainability Certification Program.
- B. This agreement sets out the terms and conditions of participation in the USDA-AMS-PVP U.S. Farm-Raised Catfish Environmental Sustainability Certification Program

TERMS AND CONDITIONS:

- A. Feed Mill agrees to take necessary steps to conform to the standards of the USDA-AMS-PVP U.S. Farm-Raised Catfish Environmental Sustainability Certification Program, including:
 - 1. Provide a signed statement annually to each farm participating in the USDA-AMS-PVP U.S. Farm-Raised Catfish Environmental Sustainability Certification Program specifying the percent of wild fishmeal and fish oil used in the feeds for the past year prior to purchase of fish.
- B. Feed mill agrees to be audited by the USDA-AMS for purposes of the U.S. Farm-Raised Catfish Environmental Sustainability Certification Program.

IN WITNESS WHEREOF, the parties have duly affixed their signatures under hand and seal this _____ day of _____.

Title _____	Title _____
Date _____	Date _____
Printed name: _____	Printed name: _____

Appendix to Standard: List of Required Documents

List of Required Documents – Growout Farms

Aquatic Animal Health

- Aquatic Animal Health Management Plan with dates of review and revision, and includes biosecurity measures (including a list of likely diseases), record of response protocols to disease outbreaks and containment measures (including those of any invasive diseases), a procedure for handling mortalities that safeguards against the human health risk from puncture wounds and bacterial infections from handling dead catfish, twice a year visual inspection of overflow drain pipes from pond facilities to minimize the risk of escapes, and appropriate personnel training
- Record of visits with fish health professional (to farm and farmer to fish health laboratory), notifications of disease outbreaks maintained either by farm or the relevant diagnostic laboratory
- Disease testing reports, diagnosis, prescriptions, treatment regime prescribed
- Record of application of medicated feed or other therapeutant
- Receipts of medicated feed purchased
- Auditor will do visual inspection of office, chemical storage area to ensure no prohibited antimicrobials in use
- Records of water quality monitoring (i.e., dissolved oxygen, chloride levels to prevent brown blood disease, alkalinity, etc.). Records can include inspection of automated dissolved oxygen monitoring systems and receipts of relevant maintenance services, records from on-farm testing, and/or water quality testing reports from diagnostic laboratories
- Record, or farm log of attendance by farmers and staff at Extension and other workshops, seminars, meetings, including the annual training conducted by the processor that manages the Quality Management System
- Record of mortalities, reason for mortalities, and handling of mortalities in accord with the procedure specified in the Aquatic Animal Health Management Plan

Chemical Use

- Record of use, rationale, and application methods of all chemicals, including disinfectants, herbicides, anaesthetics
- Record of inspection of storage of chemicals, fuel, and feed to verify safety
- Record of inspection of waste management system and disposal methods used for non-biological waste disposal
- Receipts from waste management services, including recovery of waste oil or other materials or equipment for recycling or removal from premises

Energy use

- Annual documentation of energy use through records of electric and fuel bills for comparison across years

Production records

- Yield (lb of fish sold/acre in growout production)
- FCR (lb of feed purchased/lb of fish sold)
- Record of seed purchases, including date, vaccination status, health status
- Receipt from source (s) of fry and fingerlings
- Broodstock management plan, where applicable

Predator control records

- Report to USFWS (that includes species) on take of avian predators

Examples of business records that can be used to demonstrate compliance with laws

- Business registration/license with appropriate authorities
- Deed to property or rental agreement
- Tax forms, federal, state, local
- Hatchery records show proof of conformance with stocking regulations, that fish stocked have not been harvested from the wild
- USFWS permit for avian predator control
- Well permits or well registration, as required by state law
- Prescriptions for medicated feed from veterinarians
- Pesticide Applicator License
- MSDS (Material Safety Data Sheets) data sheets on each chemical stored on farm
- Records of insurance

Annual letter from hatchery specifies:

- That all fry and fingerlings purchased were raised on the hatchery farm and not harvested from the wild
- Whether fry or fingerlings purchased have been vaccinated

Annual letter from feed mill specifies:

- Percent of fishmeal and percent of fishoil used in catfish growout feed for the year
- That fishmeal and fishoil is not from endangered species
- That fishmeal and fishoil is not from illegal, unreported, and unregulated fishing (I.U.U.)
- That feed mill has a written policy of its commitment to source feed ingredients from responsibly managed sources and to seek continued improvement

List of Required Documents – Hatcheries

Aquatic Animal Health

- Aquatic Animal Health Management Plan with dates of review and revision, and includes biosecurity measures (including a list of likely diseases), record of response protocols to disease outbreaks and containment measures (including those of any invasive diseases), and a procedure for handling mortalities that safeguards against the human health risk from puncture wounds and bacterial infections from handling dead catfish, twice a year visual inspection of overflow drain pipes from pond facilities to minimize the risk of escapes, and appropriate personnel training.
- Record of visits with fish health professional (to farm and farmer to fish health laboratory), and notifications of disease outbreaks. Records include a log maintained either by farm or the relevant fish health laboratory.
- Disease testing reports, diagnosis, prescriptions, treatment regime prescribed.
- Record of application of medicated feed.
- Receipts of medicated feed purchased.
- Auditor will do visual inspection of office, chemical storage area to ensure no prohibited antimicrobials in use.
- Records of water quality monitoring (i.e., dissolved oxygen, chloride levels to prevent brown blood disease, alkalinity, etc.). Records can include inspection of automated dissolved oxygen monitoring systems and receipts of relevant maintenance services, records from on-farm testing, and/or water quality testing reports from diagnostic laboratories.
- Record, or farm log of attendance by farmers and staff at Extension and other workshops, seminars, meetings, including the annual training conducted by the processor that manages the Quality Management System.
- Record of mortalities and reason for mortalities, and handling of mortalities in accord with the procedure specified in the Aquatic Animal Health Management Plan.

Chemical Use

- Record of use and application methods of all chemicals, including disinfectants, herbicides, anaesthetics.
- Record of inspection of storage of chemicals, fuel, and feed to verify safety
- Receipts from waste management services, including recovery of waste oil or other materials or equipment for recycling or removal from premises.

Energy use

- Annual documentation of energy use through records of electric and fuel bills for comparison across years.

Production records

- Yield from fingerling ponds
- FCR
- Record of any purchases of fry or fingerlings, including date, vaccination status, health status

- Record of harvest during which screen on drain is checked as harvest net is moved around drainpipe to prevent escapes.
- Broodstock management plan

Predator control records

- Report to USFWS (that includes species) on take of avian predators

Business records that can be used to demonstrate compliance with laws

Business registration/license with appropriate authorities

- Deed to property or rental agreement
- Tax forms, federal, state, local
- Hatchery records show proof of conformance with stocking regulations, that fish stocked have not been harvested from the wild.
- USFWS permit for avian predator control
- Well permits or well registration, as required by state law
- Prescriptions for medicated feed from veterinarians
- Pesticide Applicator License
- MSDS (Material Safety Data Sheets) on each chemical stored on farm
- Records of insurance

Hatchery-specific Records

- Record of invoices from vaccine provider
- Records of application of vaccine
- Invoices of fry and fingerling sales to farms

List of Required Documents – Feed mills

- Receipts from purchases of fishmeal & fishoil, specifying species and fishery
- Written policy statement that specifies that ingredients are sourced from responsibly managed sources.
- Documentation that terrestrial feed ingredients sourced do not have significant environmental impacts.
- Copy of prescriptions for therapeutants from veterinarian for medicated feed

APPENDIX B

TEMPLATES FOR DOCUMENT CONTROL

CFA Sustainability-1. Outline of Annual Report. 10/17/2024

Activities

Outcomes

Impacts

Annual Management Review

Overall performance in [year]

USDA-PVP audits and auditors

Stakeholder comments for future version s of the Standard

Notification to stakeholders

Comments received from stakeholders, responses, changes to Standard

Transparency

Document Control

Table 1. Performance indicators for the US Catfish Sustainability Program of the Standard

Table 2. Non-conformances continuous improvement points identified, and recommendations

CFA Sustainability – 4. Request for Additional Information on Catfish Sustainability Program. 10/17/2024

Date	Contact information	Information request	Response (with date)

APPENDIX C

Additional Resources

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