

ANNEX BC

Extracted from the MSC Certification Requirements version 1.2

This document is an extract from the MSC Certification Requirements and is provided for the distribution to any individual or organisation interested in MSC Group Certification.

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ANNEX BC: Checklist for Group Chain of Custody – Normative

Checklist of Requirements for Group Chain of Custody Certification

Introduction

This document sets out requirements for organisations operating over multiple sites that seek certification (“group certification”). It has been developed for use by CABs and in order to assist both groups of individual enterprises and multiple site companies (“organisations”) achieve certification in an effective and cost efficient manner while providing stakeholders with an appropriate level of assurance of conformance.

An organisation’s compliance with this document will be audited by a CAB as part of the mandatory requirements to be followed by CABs when performing chain of custody certification audits of organisations.

Table BC 1: Checklist for of Requirements for Group Chain of Custody Certification

Reference	Requirement	Evidence of Conformity
BC1	Management Responsibility – The group entity shall establish, implement and maintain management systems that provide the group entity with an assurance that there are effective internal controls in place over all activities which are required for conformity with the MSC Chain of Custody Standard and all certification requirements.	
BC1.1	Policy Manual	
BC1.1.1	The group entity shall document how it will comply with MSC requirements in a manual containing the following:	
BC1.1.1.1	The group entity’s stated commitment to conformity with MSC requirements and with internal rules relating to the operation of the group certification program.	
BC1.1.1.2	A description of the relationship (i.e. wholly owned, franchised, bound by contract) between the group entity and each of the sites.	
BC1.1.1.3	A description of how responsibilities to comply with MSC requirements will be divided between the group entity and individual sites.	
BC1.1.1.4	A description of how MSC and CAB requirements are communicated to sites and how changes in requirements are implemented at group entity and site level.	

Reference	Requirement	Evidence of Conformity
BC1.1.1.5	A commitment to provide the necessary resources (qualified personnel, financial, legal and physical resources) to undertake the group entity's duties and a description of how those resources will be provided and funded.	
BC1.1.1.6	An organisational chart or similar of the group entity's organisation showing relevant positions, and their interrelationship.	
BC1.1.1.7	For each relevant position shown in the organisational chart a short description of their key responsibilities and authorities with regard to ensuring conformity with MSC requirements.	
BC1.1.1.8	A description of how personnel at all levels undertaking activities related to the MSC program will be trained about the MSC's objectives and requirements.	
BC1.2	MSC Representative	
BC1.2.1	The group entity shall appoint one person who, irrespective of other duties, has the responsibility to ensure the group's conformity with all MSC requirements.	
BC1.3	Agreement between group entity and each site	
BC1.3.1	The group entity shall enter into implement an written agreement with each site, which will set out as a minimum the following MSC requirement ⁵²	
BC1.3.1.1	A commitment by the site's manager to comply with MSC requirements and with all group procedures, policies and other requirements regarding conformity with MSC requirements, including those relating to use of the MSC ecolabel.	
BC1.3.1.2	The authority, responsibilities and obligations of each site and of the site's manager with respect to MSC requirements.	
BC1.3.1.3	That the site agrees to:	
a.	Being listed as a site in the group's application for MSC CoC certification.	
b.	Conform to the terms of the contract between the group entity and its CAB, including the release of certain information into the public domain, for example through the MSC's website.	
c.	Allow the group entity, CAB, ASI and the MSC access for purposes of conformity audits to the site's premises, records and approval to speak to personnel.	
d.	Allow the CAB to make irregularly timed short notice audits.	
BC1.3.1.4	The site accepts the sanctions that will be applied to the site by the group entity in cases of non-conformity.	

⁵² Standards Director, 24 October 2011, date of application 14 November 2011

Reference	Requirement	Evidence of Conformity
BC1.3.1.5	An agreement regarding sharing of all costs, unless costs are all to be paid by the group entity.	
BC1.3.1.6	In the case of sites, which are not part of the same legal entity as the group entity, the agreement shall contain the name and / or legal identity of each party, contact name and addresses and be legally binding on the group entity and the site's owner.	
BC1.3.2	The group entity shall demonstrate the implementation of this agreement in one of the following three ways:	
BC1.3.2.1	The sites are fully owned by the group,	
BC1.3.2.2	The group entity has a contract with each of the site's requiring their compliance with its decisions, or	
BC1.3.2.3	The group entity has evidence of a commitment from each of the site's managers as outlined in requirements BC1.3.1.1 - BC1.3.1.6.⁵³	
BC1.4	Register of Sites	
BC1.4.1	The group entity shall maintain a register of sites, which are part of the group. The register shall be in a form that is simple to search, and shall contain, at minimum, the following information:	
BC1.4.1.1	The postal and physical address of each site.	
BC1.4.1.2	The name of each site's key contact person.	
BC1.4.1.3	The telephone, facsimile and email contacts for each site.	
BC1.4.1.4	The scope for each site, if these differ from the Group entity.	
BC1.4.1.5	The current site status within the group (current, suspended or withdrawn).	
BC1.4.1.6	The date on which any sites joined the group, and if applicable left the group, with an explanation of the reasons for their leaving.	
BC1.4.2	The Register of Sites shall be kept up to date, no more than 10 days in arrears.	
BC1.4.3	The provisions of Section BC5 below and Section BB8 of Annex BB apply to the addition of new sites to the group.	
BC1.4.4	The use of subcontractors by sites shall not be allowed unless they hold their own CoC Certificate, or are part of the group.	
BC2	Internal Control System Requirements	
BC2.1	Internal control system	

⁵³ Standards Director, 24 October 2011, date of application 14 November 2011

Reference	Requirement	Evidence of Conformity
BC2.1.1	The group entity shall ensure that an internal control system complying with section BC2 is documented and maintained, such that all sites and the group entity comply with all MSC requirements. Responsibilities for action shall be clearly divided between the group entity and each site, as required in BC1.1.1.3.	
BC2.1.2	In addition to meeting the MSC CoC standard requirements the internal control system shall include the elements identified in Sections BC2.2 – BC2.9.	
BC2.2	Purchasing, receiving and storage	
BC2.2.1	Processes for purchasing and receiving delivery of MSC-certified product shall be documented, implemented and maintained, including:	
BC2.2.1.1	The division of responsibility between the group entity and the sites.	
BC2.2.1.2	The purchasing procedures to be used centrally and / or at each site, noting requirement to verify the supplier is MSC-certified for correct fish species, activity and product, if any.	
BC2.2.1.3	How product delivered will be verified as meeting the requirements of the MSC CoC Standard.	
BC2.2.1.4	How product will be quarantined or otherwise managed to prevent its use as MSC-certified product if the MSC status is not known at time of delivery.	
BC2.3	Traceability	
BC2.3.1	Processes by which MSC-certified inputs and outputs are traced back to the immediate supplier, and forwarded to the immediate customer shall be documented, implemented and maintained.	
BC2.3.1.1	If the site is a retail or foodservice site dealing with final consumers forward traceability to each consumer is not required, however total volumes of certified products sold must be recorded to enable an input and output reconciliation (see BC3.6).	
BC2.3.1.2	Where product is transformed or repacked, in-process traceability shall be established so that all MSC-certified product will be identified and segregated during all handling and storage operations.	
BC2.4	Personnel Management	
BC2.4.1	Processes for personnel management shall be documented, implemented and maintained, including:	
BC2.4.1.1	How staff will be trained about MSC's requirements.	
BC2.4.1.2	How conformity with minimum qualification criteria set in clause BC3.4 for internal auditors will be achieved.	
BC2.4.1.3	How staff will be informed about ecolabel licensing procedures.	
BC2.5	Document Control	

Reference	Requirement	Evidence of Conformity
BC2.5.1	Processes for control of group scheme documentation shall be documented, implemented and maintained, including:	
BC2.5.1.1	How documents will be uniquely identified with a version number or date.	
BC2.5.1.2	How current copies of documents will be made available at all places where they are required, and how users will be prevented from using obsolete documents.	
BC2.5.1.3	How documents will be reviewed and approved by authorized personnel within the group prior to their issue.	
BC2.5.1.4	How documents will be updated following issue of new MSC, ASI or CAB requirements.	
BC2.5.1.5	How documents will be periodically reviewed, and if changed are re-approved by authorized personnel prior to their issue.	
BC2.5.1.6	How changes to documents will be identified to readers.	
BC2.5.1.7	how, in cases where languages used are different between sites, will translations be provided and how will document control procedures address the method of ensuring that all versions are kept synchronized and consistently implemented.	
BC2.6	Control of nonconforming product	
BC2.6.1	Processes for the control of nonconforming product, including processes for withdrawal and/or recall of product shall be documented, implemented and maintained as follows.	
BC2.6.1.1	Nonconforming product shall be identified, isolated and prevented from being shipped as soon as site management or the group entity becomes aware of its non-conformity.	
BC2.6.1.2	If the nonconforming product is first identified at a site, the MSC Representative (see BC1.2) shall be informed within four days and they shall undertake corrective action for all sites (as specified in clause BC2.7).	
BC2.6.1.3	A review of the cause and extent of non-conformity shall be undertaken by the group entity, and if there is a risk that non-MSC-certified product may have been shipped as MSC-certified product then:	
a.	A trade withdrawal or trade recall shall be instituted to recall non-conforming product from trade customers.	
b.	The CAB and MSC shall be notified within four days of the group entity becoming aware of the problem.	
BC2.6.1.4	As an alternative to recall, nonconforming product may be reworked or relabelled so it is not identified as MSC-certified. If this solution is proposed, the procedures that will be used to control nonconforming product must be submitted to the CAB for their review and approval before reworking or relabeling occurs.	

Reference	Requirement	Evidence of Conformity
BC2.6.1.5	The procedures in BC2.6.1.3 and BC2.6.1.4 above shall follow best practice, and shall be tested at least annually with a realistic exercise.	
BC2.6.1.6	Records shall be kept detailing the disposal, rework or relabeling performed on the nonconforming product.	
BC2.7	Corrective and Preventive action	
BC2.7.1	The processes by which corrective and preventive action occur shall be in place in advance of certification.	
BC2.7.1.1	Within two days of an actual or potential non-conformity being identified at any site, the group entity's MSC Representative shall be informed of the fact by that site's management or by the internal auditor. The group entity's staff shall review the non-conformity, and determine if this is a one off problem limited to that site, or if it is a potentially a systematic problem. If systematic, the group entity shall commence corrective action processes for all sites. If not systematic, the group entity shall commence corrective action processes for the site.	
BC2.7.1.2	Corrective and preventive action processes shall address all actual or identified potential non-conformity, whether identified at internal or external audit, from complaints or by other means. The process shall include the following steps:	
a.	Determine the root cause of the problem or potential problem.	
b.	Evaluate what changes are required to ensure that the problem cannot re-occur, and to correct all actual or potential non-conformities arising from the problem.	
c.	Evaluate if the root cause of the problem identified may have caused any problems at other sites that need to be addressed, and determine what should be done to correct those problems.	
d.	Identify and implement changes to policies, procedures, forms, or practices to ensure that the problem is prevented from re-occurring (corrective action) or occurring at all sites (preventive action), and that all other potential issues arising from the root cause are addressed.	
e.	Record all actions taken.	
f.	Verify that the corrective or preventive action has been effective in solving the problem identified.	
BC2.8	Records	
BC2.8.1	The group entity shall define what records shall be created for both group entity and site operations to demonstrate effective control of all processes (including for the group entity the processes for verification of site conformity) and conformity with all MSC requirements, and for each record shall define:	
BC2.8.1.1	The retention times shall be a minimum of three years.	

Reference	Requirement	Evidence of Conformity
BC2.8.1.2	How records are to be stored to ensure they remain in good condition, legible and accessible as required.	
BC2.8.1.3	How electronic records will be backed up.	
BC2.8.2	Secure and backed up electronic records are acceptable. If a signature is required, this can be a password or electronic signature providing it is unique to the person signing.	
BC2.9	Management review	
BC2.9.1	A review of the effectiveness of the internal control process and system in meeting MSC requirements on a minimum annual basis shall be documented, implemented and maintained and shall include:	
BC2.9.1.1	Who will be involved in the review.	
BC2.9.1.2	Results of all verification activities, both internal and external.	
BC2.9.1.3	Any internal or external non-conformities raised, and the corrective and preventive actions taken to address them.	
BC2.9.1.4	Any complaints relating to the operation of the MSC program.	
BC2.9.1.5	How actions will be recorded and followed up on.	
BC2.9.2	At least one management review shall be completed prior to the first certification audit.	
BC3	Verification Of Site And Internal Control Systems Compliance	
BC3.1	Verification system	
BC3.1.1	The group entity shall ensure that there is a system documented, implemented and maintained to verify that:	
BC3.1.2	All sites comply with MSC's and the group's internal requirements.	
BC3.1.3	That the group entity complies with MSC's and the group's internal requirements.	
BC3.2	Internal Audit planning and scheduling	
BC3.2.1	Internal audits of every site and of the group entity shall take place at minimum once per year (or more often as required by the status and nature of the activity performed on each site).	
BC3.2.2	Internal audits shall take a form that is appropriate to the size and nature of the group and its sites⁵⁴.	
BC3.2.3	There shall be an annual plan and schedule for internal audits which, where necessary, shall be adjusted to reflect the results of previous internal audits.	
BC3.2.4	The internal audit plan and schedule shall include information on each site covering:	

⁵⁴ Standards Director, 24 October 2011, date of application 14 November 2011

Reference	Requirement	Evidence of Conformity
BC3.2.4.1	The format used to carry out internal audits, if different from onsite audits⁵⁵.	
BC3.2.4.2	The proposed date of the next internal audit.	
BC3.2.4.3	The date and results of the last internal audit.	
BC3.2.4.4	The type of internal audit (initial, annual, follow-up, unannounced).	
BC3.2.4.5	The name of the internal auditor who performed the last internal audit.	
BC3.2.4.6	Any open non-conformities and the dates by which they must be closed.	
BC3.2.4.7	The site's current status (e.g. current, suspended or withdrawn).	
BC3.2.4.8	Any other details felt important.	
BC3.2.5	Internal audits to satisfy MSC requirements may take place at the same time as other internal audit or verification activities.	
BC3.3	Internal audits in advance of initial CAB audit	
BC3.3.1	Prior to the initial certification audit taking place, all sites in the group shall have been internally audited by the group entity, and shall have no outstanding critical or major non-conformities. There shall have been an internal audit of the group entity's systems, and there shall be no outstanding critical or major non-conformities.	
BC3.3.2	The internal audit may have been undertaken for other reasons. Any internal audit, which has been performed within the past 12 months that confirms site conformance with requirements set out, shall be acceptable.	
BC3.3.3	If the audits were not undertaken specifically for MSC:	
BC3.3.3.1	The internal audit plan and schedule shall include information on each site covering the proposed date of the internal audit.	
BC3.3.3.2	The group entity must be able to demonstrate through other audit records (e.g. food safety or quality audits) that all sites in the group can comply with requirements.	
BC3.3.3.3	The group entity must have evidence that each site has acknowledged receipt of information regarding MSC requirements specifically.	
BC3.3.3.4	The group entity must note that the sites may be audited by the CAB and that the group will be rejected if sites with non-conformances exceed the reject number.	
BC3.4	Internal auditor qualification criteria	
BC3.4.1	Internal auditors shall comply with qualification criteria as follows.	

⁵⁵ Standards Director, 24 October 2011, date of application 14 November 2011

Reference	Requirement	Evidence of Conformity
BC3.4.1.1	All internal auditors shall be able to demonstrate knowledge of the MSC requirements for CoC, and of the requirements for group certification.	
BC3.4.1.2	Internal auditors of activities performed at site level shall have a minimum of two years of experience in fishing industry supply chain activity at the point in the supply chain that the group activities occur (or can justify to their CAB why other experience is relevant) and	
BC3.4.1.3	Internal auditors shall be able to demonstrate that they understand audit processes, and undertake internal audits in accordance with Section BC3.5.1.2.	
BC3.4.2	Where more than one auditor is used to conduct internal audits of sites, there shall be at least one internal audit each year where each auditor is “shadowed” by another auditor to provide feedback aimed at ensuring consistency of interpretation of requirements and of decisions.	
BC3.4.2.1	Records of shadow audits shall be kept.	
BC3.5	Internal audit process	
BC3.5.1	The internal audit process shall be defined by way of procedures, checklists, report formats or similar tools, and shall include:	
BC3.5.1.1	Direction on what elements of the internal control system shall be audited at each site.	
BC3.5.1.2	What processes the internal audit itself will follow which shall be in general agreement with the guidance provided by ISO 19011’s guidelines for auditing, that is; audit preparation, an informal opening meeting, collection of information on how evidence of conformity and non-conformity will be collected, a closing meeting where audit findings are reported to and accepted by site representatives and a written report ⁵⁶ .	
BC3.5.1.3	How the internal audit will be reported, with emphasis on reporting of actual non-conformities or areas for system improvement.	
BC3.5.1.4	How non-conformities will be verified as being addressed following corrective action by the site or group entity.	
BC3.5.1.5	Records of verification shall include evidence of actions taken, and of the effectiveness of those actions in addressing the root cause of the non-conformity.	
BC3.6	Input and output reconciliation	
BC3.6.1	The group entity shall assess each site’s system for batch reconciliation by collecting and reviewing records of reconciliations of inputs and outputs on an annual basis. The group entity shall be confident that the system used for traceability is effective for all the products listed in the certification scope.	

⁵⁶ Standards Director, 24 October 2011, date of application 14 November 2011

Reference	Requirement	Evidence of Conformity
BC3.7	Decision on site conformity	
BC3.7.1	The decision on whether a site is in conformity with all MSC and group requirements shall be made by a person or a committee who has not been involved in the site audit (a “decision maker”), and shall be based on the objective evidence provided by the site audit and all other evidence that may be available to the decision maker.	
BC3.7.1.1	If the group entity does not have a person that was not involved in the site audit, a committee of some of the site managers may make the decision for each site, extracting themselves from the decision regarding their site as per BC3.8 below.	
BC3.8	Impartiality	
BC3.8.1	Impartiality shall be maintained at all stages of verification processes, including a check to ensure that site auditors and decision makers have no significant conflicts of interest. Where a possible significant conflict of interest is identified, the individual or committee member concerned shall recuse herself or himself from the verification activity or decision-making.	
BC4	Sanctions	
BC4.1	Grading of non-conformities	
BC4.1.1	The internal auditor who raises non-conformities shall analyse and grade them into one of three categories:	
BC4.1.1.1	Critical – where product is found which is labelled as MSC-certified but is shown not to be MSC-certified.	
BC4.1.1.2	Major – where there is a breakdown which could result in non-MSC-certified being sold as MSC-certified products.	
BC4.1.1.3	Minor – where there is a breakdown which is unlikely to result in non-MSC-certified product being sold as MSC-certified product and all other non-conformities.	
BC4.2	Timing and corrective actions for site non-conformities	
BC4.2.1	Non-conformities found in individual sites shall be addressed as follows.	
BC4.2.1.1	Site Critical non-conformities shall result in immediate suspension of the site from the group. In addition, the group entity shall, within 20 days, undertake corrective and preventive action as specified in BC2.7.1.2 to verify that the non-conformity does not pose a risk to operations at other sites.	
BC4.2.1.2	Site Major non-conformities shall be corrected (following corrective action as specified in BC2.7.1.2) within two months of their identification. If not corrected within this time frame, the non-conformity shall be reclassified as critical and the site shall be immediately suspended from the group.	

Reference	Requirement	Evidence of Conformity
BC4.2.1.3	Site Minor non-conformities shall be corrected (following corrective action as specified in BC2.7.1.2) within twelve months of their identification. If not corrected within this time frame, the non-conformity shall be reclassified as major and there shall be two months given to correct it.	
BC4.2.1.4	Timeframes given in BC4.2.1.2 and BC4.2.1.3 above may only be varied if the site at which the non-conformity was raised is not handling MSC-certified fish during the extended period.	
BC4.3	Timing and corrective actions for group entity non-conformities	
BC4.3.1	Non-conformities found in the group entity as identified by an internal audit shall be addressed as follows.	
BC4.3.1.1	Critical non-conformities shall result in the group entity immediately instructing all sites to immediately stop packaging and cease making any claim about MSC certification for affected product(s). The group entity shall inform its CAB within 24 hours of finding the non-conformity. The CAB may prescribe further actions.	
BC4.3.1.2	Major non-conformities shall be corrected within two months of their identification. If not corrected within this time frame, the non-conformity shall be immediately re-graded as Critical.	
BC4.3.1.3	Minor non-conformities shall be corrected within twelve months of their identification. If not corrected within this time frame, the non-conformity shall be immediately re-graded as Major.	
BC4.3.1.4	Timeframes given above may only be varied if the entire group concerned is not handling MSC-certified fish during the extended period.	
BC4.4	Suspension of individual sites	
BC4.4.1	Suspension of individual sites shall be for a period of either:	
BC4.4.1.1	A minimum of six months if the integrity of the certified supply chain has intentionally and/or systematically been compromised.	
BC4.4.1.2	For a period of time sufficient to ensure that the non-conformity and its causes have been satisfactorily addressed if the integrity of the certified supply chain has not systematically and/or intentionally been compromised.	
BC4.4.2	Following these time periods, if the non-conformity has been satisfactorily addressed, suspension may be lifted. During suspension no claim relating to MSC-certified product shall be made. The group's CAB shall be notified of all suspensions within 10 days.	
BC4.5	Withdrawal	

Reference	Requirement	Evidence of Conformity
BC4.5.1	If the reasons for suspension are not addressed within the timeframe allowed in clause BC4.4, the site shall be removed from the group, and cannot reapply for entry for a minimum period of 24 months.	
BC5	Sites Joining and Leaving the Group After Initial Certification	
BC5.1	Internal audit required prior to entry of new sites after certification	
BC5.1.1	Prior to new sites being added to the group, applicant sites shall be internally audited by the group entity, and shall have no outstanding critical or major non-conformities with the requirements of the group and this document.	
BC5.2	Approval of the CAB	
BC5.2.1	The CAB shall be advised of the intention to add new sites to the group, provided with a copy of audit records for that site, and be notified of all site details as required for the Register of Sites (Clause BC1.4).	
BC5.2.1.1	If the number of sites added to the group since the last CAB audit is less than or equal to 10% of the number of sites at the time of that audit, and if the additional sites do not add new activities to the scope of the certificate, sites may be added with no CAB activity required, but the group entity shall note that the CAB may decide to perform an additional audit.	
BC5.2.1.2	If the number of sites added to the group since the last CAB audit is in excess of 10% of the number of sites at the time of that audit, or if the additional sites add new activities to the scope of the certificate, sites shall not be added to the group without the written consent of the CAB, who may be required to perform additional audits prior to granting consent.	
BC5.3	New sites added to Register	
BC5.3.1	Once approval to add new sites to the group has been granted by the decision maker or the CAB as appropriate, the new sites shall be added to the group, and their details included in the Register of Sites.	
BC5.4	Sites withdrawing for any reason	
BC5.4.1	Sites who withdraw from the group for whatever reason shall:	
BC5.4.1.1	Be removed from the register of sites.	
BC5.4.1.2	Be required to sign an acknowledgement that they are no longer part of the group, and may not continue to use the MSC ecolabel or trade name.	
BC5.4.1.3	Have their names advised to the CAB within 10 days of withdrawal.	
BC6	Ecolabel Licensing Requirements	
BC6.1	Responsibility	

Reference	Requirement	Evidence of Conformity
BC6.1.1	The group entity is responsible for ensuring all matters relating to licensing of the use of the MSC ecolabel within the group are managed or coordinated as set out in this section.	
BC6.1.1.1	If the group entity and all sites are part of the same legal entity and MSC's trademarks are to be used, the group entity shall sign the ecolabel licence on behalf of the group.	
BC6.1.1.2	If the group entity and sites are not all part of the same legal entity and MSC's trademarks are to be used by individual sites then each site shall sign an ecolabel licence. The group entity shall coordinate their required applications for approval, sales returns and fee payments.	
BC6.2	Ecolabel use Procedure	
BC6.2.1	There shall be a documented procedure setting out how the group as a whole and / or how individual sites may use the ecolabel, including processes for:	
BC6.2.1.1	Communicating the rules for the use of the MSC trademarks to all sites.	
BC6.2.1.2	Applying to Marine Stewardship Council International Ltd (MSCI) for approval to use the ecolabel.	
BC6.2.1.3	Providing required information on sales returns.	
BC6.2.1.4	Collection of funds owing to MSCI for royalty payments.	
BC6.3	Application for approval to use the ecolabel on products	
BC6.3.1	All requests from sites and / or the group entity for use of the MSC ecolabel for consumer facing, non-consumer facing or menu use (as required by the ecolabel licensing agreement) shall be presented to MSCI by the group entity, who shall also communicate MSCI's decisions to the relevant individual site(s).	
BC6.4	Ecolabel license fees	
BC6.4.1	The group entity is ultimately responsible for collating data covering sales of MSC-labelled products made by each site and providing this information to MSCI.	
BC6.4.1.1	If the group is compliant with BC6.1.1.1 and the group entity and all sites are part of the same legal entity, the group entity will be invoiced for the royalties owed by each site within the group. It is liable for payment of all fees to MSCI.	

Reference	Requirement	Evidence of Conformity
BC6.4.1.2	If the group is compliant with BC6.1.1.2 and the group entity and sites are not all part of the same legal entity, each site will be invoiced separately for the royalties owed by the site. The site is liable for payment of all fees to MSCl, and lack of compliance shall lead to notification of the group entity to audit the site and if necessary, issue a non-conformity.	
BC6.5	Certificate number code⁵⁷	
BC6.5.1	In accordance with ecolabel licensing rules, each site shall use the certificate number code⁵⁸ allocated to the group, and the sub-code allocated to it when referring to its certified status.	
BC7	Responsibility to the CAB	
BC7.1	Relationship with the CAB	
BC7.1.1	The group entity shall sign the certification contract with the CAB, and shall be responsible to the CAB for the group's conformity with all MSC requirements, and fulfilment of any conditions raised by the CAB. It is responsible to the CAB for all payments for certification costs.	
BC7.2	Communication	
BC7.2.1	The group entity shall be responsible for all communications between the group and the CAB other than those related to any unannounced CAB audit of individual sites.	

----- End of Annex BC -----

⁵⁷ Standards Director, 10 January 2012, date of application immediate, reference changed

⁵⁸ Standards Director, 10 January 2012, date of application immediate, reference changed