

**Marine Stewardship Council**

---

---

## **MSC Chain of Custody Certification Requirements**



**Version 2.0, 20<sup>th</sup> February, 2015**

## About the Marine Stewardship Council

The Marine Stewardship Council (MSC) is an international non-profit organisation that sets standards for sustainable fisheries and supply chain traceability (Chain of Custody).

### Vision

The MSC's vision is of the world's oceans teeming with life, and seafood supplies safeguarded for this and future generations.

### Mission

The MSC's mission is to use our ecolabel and fishery certification program to contribute to the health of the world's oceans by recognising and rewarding sustainable fishing practices, influencing the choices people make when buying seafood, and working with our partners to transform the seafood market to a sustainable basis.

## Copyright Notice

The Marine Stewardship Council "MSC Chain of Custody Certification Requirements" and its content are copyright of "Marine Stewardship Council" - © "Marine Stewardship Council" 2015. All rights reserved.

The official language of this standard is English. The definitive version is maintained on the MSC's website [www.msc.org](http://www.msc.org). Any discrepancy between copies, versions or translations shall be resolved by reference to the definitive English version.

The MSC prohibits any modification of part or all of the contents in any form.

Marine Stewardship Council  
Marine House  
1 Snow Hill  
London EC1A 2DH  
United Kingdom

Phone: + 44 (0) 20 7246 8900  
Fax: + 44 (0) 20 7246 8901  
Email: [standards@msc.org](mailto:standards@msc.org)

## Table of Contents

Introduction.....	5
A. Responsibility for these requirements .....	5
B. About this document .....	5
C. General introduction .....	7
D. Effective date .....	7
E. Review date .....	8
MSC Chain of Custody Certification Requirements .....	9
1 Scope .....	9
2 Normative Documents .....	9
3 Terms and Definitions .....	10
4 Structural Requirements .....	10
5 Resource Requirements .....	10
5.1 Personnel.....	10
6 Process Requirements .....	16
6.1 Need for CoC certification .....	16
6.2 Certification options .....	18
6.3 Application.....	23
6.4 Contract .....	26
6.5 Use of trademarks .....	27
7 Audit Planning .....	27
7.1 Requirements for all CoC clients .....	27
7.2 Additional audit planning for CFO clients .....	29
8 Evaluation .....	35
8.1 Requirements for all CoC audits.....	35
8.2 Evaluation for single, multi-site and group CoC audits .....	35
8.3 Evaluation for CFO audits .....	40
8.4 Evaluation of subcontractors .....	45
9 Audit Findings .....	46
9.1 Audit findings at all CoC audits.....	46
9.2 Audit findings at single, multi-site and CFO audits .....	46
9.3 Additional requirements for major non-conformities at CFO audits .....	48
9.4 Audit findings at Group CoC audits .....	49
10 Additional Certification Requirements For Group CoC .....	52

<b>10.1</b>	CAB eligibility to perform group certification.....	52
<b>10.2</b>	Scope of audits.....	53
<b>10.3</b>	Sample stratification .....	53
<b>10.4</b>	CAB decides sample plan to be used .....	53
<b>10.5</b>	Site sample plan.....	55
<b>10.6</b>	Sample selection.....	56
<b>10.7</b>	Adding new sites to the group .....	57
<b>11</b>	<b>Certificate Management For All CoC Clients .....</b>	<b>62</b>
<b>11.1</b>	Certification decision.....	62
<b>11.2</b>	Changes to the certificate .....	64
<b>11.3</b>	Surveillance frequency and additional audits .....	65
<b>11.4</b>	Recertification.....	68

## List of Tables

Table 1: CoC auditor qualification and competency criteria.....	11
Table 2: CAB lead auditor qualification and competency criteria .....	14
Table 3: Group CoC central office auditor .....	14
Table 4: Options for certification.....	19
Table 5: Activity scope definitions .....	24
Table 6: Risk assessment scoring for CFOs .....	30
Table 7: Risk scoring.....	31
Table 8: Risk-based audit activities for CFOs .....	31
Table 9: Site sampling for Consumer-Facing Organisations.....	33
Table 10: Reject number of sites following major non-conformities .....	48
Table 11: Reject number of sites – Group CoC .....	50
Table 12: Sample plan allocation .....	54
Table 13: Allocation to sample table.....	55
Table 14: Sample selection hierarchy.....	56
Table 15: Sample plan for Group CoC – High Risk.....	58
Table 16: Sample Plan for Group CoC – Medium Risk .....	59
Table 17: Sample plan for Group CoC – Low Risk.....	60
Table 18: Sample Plan for Group CoC – Very Low Risk .....	61

## Introduction

### A. Responsibility for these requirements

Responsibility for these requirements is held by the Marine Stewardship Council. Readers should verify that they are using the latest copy of this (and other related documents). The definitive version of the requirements is maintained on the MSC's website at [www.msc.org](http://www.msc.org).

#### Versions issued

Version No.	Date	Description Of Amendment
Consultation Draft	17 January 2011	First publication of consolidated MSC scheme requirements, released for consultation.
0.0	7 March 2011	First draft of revisions following MSC and conformity assessment body consultations.
0.8	19 May 2011	Draft issued to the MSC Technical Advisory Board for final review and sign-off.
1.0	15 August 2011	First version issued for application by conformity assessment bodies.
1.1	24 October 2011	Version issued incorporating revised Group CoC requirements and correcting typos, page numbering, wrong and missing referencing and unreadable flowcharts.
1.2	10 January 2012	Version issued incorporating TAB 20 agreed changes regarding reassessment, objections procedure, modifications to the default assessment tree to assess bivalves, implementation timeframes and ASC requirements. Minor edits, wrong and missing referencing, typos and unreadable Figures were corrected.
1.3	14 January 2013	Version issued incorporating TAB 21 and BoT agreed changes. Minor edits and clarifications were also incorporated.
1.4	31 January 2014	Version issued incorporating TAB 22 and BoT agreed changes. Parts A and B only released in v1.4
2.0	20 February 2015	Version issued as a result of the Chain of Custody program review, including changes agreed by TAB 24 and the BoT.

### B. About this document

The Chain of Custody Certification Requirements (CoC CR) contains mandatory requirements for all Conformity Assessment Bodies (CABs) that carry out audits of fisheries or supply chain organisations who wish to make a claim that product(s) they are selling are from a well-managed and sustainable source(s).

#### Requirements

The purposes of the CoC CR are:

- To establish consistent certification requirements that enable all CABs to operate in a consistent and controlled manner;
- To provide the transparency that is required of an international certification scheme for it to have credibility with potential stakeholders, including governments, international governmental bodies (e.g., regulatory bodies, fishery managers), CABs, suppliers of fish and fish products, non-governmental organisations and consumers;
- To provide documentation designed to assure long-term continuity and consistency in the delivery of MSC certification.

## Guidance

Guidance has been produced to:

- Help CABs interpret this document;
- Provide clarification on questions asked by CABs;
- Address areas of concern to the MSC;
- Act as a training aid for both MSC and CAB staff;
- Detail process that should be followed in special cases.

Guidance that relates to a section, or relates to the content of a specific clause, appears in a box at the beginning of the section or end of the clause.

## Auditability

The guidance is not directly auditable. It is, however, expected that the guidance included in this document will be applied by CABs, where applicable, unless there is a justification for not doing so.

## Derogations

A derogation indicates a measure which allows for all or part of the requirement to be applied differently, or not at all, to certain applicants or certificate holders.

Derogations are indicated by a footnote including:

- The authority who made the decision on the derogation;
- The date or meeting number of the decision;
- The date on which the derogation came into force or expires; and
- A short description of the derogation.

## C. General introduction

### Chain of Custody certification

Chain of Custody (CoC) certification provides credible assurance that products sold with the MSC trademarks originated from a certified fishery and can be traced throughout the supply chain to a certified source.

Companies certified against the MSC CoC Standard are audited by a third-party accredited certification body and are subject to periodic surveillance audits over the three year period of a CoC certificate.

### Use of MSC's Chain of Custody by other standard setting organisations

The MSC CoC Standard is made available for use by selected organisations that operate certification schemes. At the time these requirements were issued, the Aquaculture Stewardship Council (ASC) has elected to use the MSC CoC Standard for all certified seafood products originating from ASC-certified farms. This allows supply chain companies to handle both MSC-certified and ASC-certified seafood with a single CoC audit, although separate CoC certificates are issued and each standard has distinct trademarks. If other certification schemes choose to also use the MSC CoC Standard in the future, this information will be published on the MSC website.

### CoC Standard

The MSC has one Default Chain of Custody Standard and two variants: one version for Group organisations and one version for Consumer-Facing Organisations (CFOs). Further information on eligibility for each version of the CoC Standard can be found in the CoC CR section 6.2 and in the introduction to each document.

Five core principles form the MSC Chain of Custody Standard:

**Principle 1: Certified products are purchased from certified suppliers**

**Principle 2: Certified products are identifiable**

**Principle 3: Certified products are segregated**

**Principle 4: Certified products are traceable and volumes are recorded**

**Principle 5: The organisation has a management system**

## D. Effective date

The effective date for version 2.0 of the CoC CR is 1<sup>st</sup> September 2015. All CoC audits carried out on or after this date must use this version of the requirements.

## **E. Review date**

Changes may be made to this document periodically following the MSC Policy Development cycle.

More information about the MSC policy development process and MSC Standard Setting Procedure can be found on the [MSC Policy website](#) and [MSC website](#).



# MSC Chain of Custody Certification Requirements

## 1 Scope

The scope of the MSC's Chain of Custody Certification Requirements (CoC CR) includes activities that all CAs shall undertake in carrying out Chain of Custody (CoC) certification and audit activities for organisations in the supply chain. CoC certification is required for all organisations trading in certified products that wish to make a claim that the seafood they are buying or selling comes from a well-managed and sustainable source that has been certified to the MSC's Fisheries Standard, or to other standards as recognised by the MSC.

Once a certified product is placed into consumer-ready tamper-proof packaging, CoC certification is no longer required for organisations trading or handling these products.

Where the MSC has a formal agreement with other certification schemes (such as the Aquaculture Stewardship Council, or ASC) to share the MSC's CoC Standards, products from sources certified against these standards can also utilise the MSC CoC system, provided each organisation has the appropriate products in their CoC scope.

## 2 Normative Documents

The following documents contain provisions which, through reference in this text, become part of the CoC CR.

- a. Single and Multi-site CoC Audit Checklist and Reporting Template;
- b. Group CoC Audit Checklist and Reporting Template;
- c. Consumer-Facing Organisation Audit Checklist and Reporting Template;
- d. MSC eCert database user manual for CAs: Chain of Custody;
- e. MSC Seafood Sampling Procedure;
- f. MSC Certified Ingredient Percentage Rules.

For documents that specify a date or version number, earlier amendments or revisions of that document do not apply as a normative requirement. Where more recent versions are available, CAs are encouraged to review the most recent editions and any guidance documents available to gain further insight into how the document has changed, and to consider whether or not to implement the latest changes.

For documents without dates or version numbers, the latest published edition of the document referred to applies unless otherwise stated in this document.

In addition, the normative documents listed in the [MSC General Certification Requirements \(GCR\)](#) Section 2 apply to the implementation of the CoC CR.

### 3 Terms and Definitions

Concepts, terms and phrases used are defined in the [MSC & MSCI Vocabulary](#).

Concepts, terms or phrases used in the CoC CR that have more than one definition are defined within the text where such terms or phrases appear.

### 4 Structural Requirements

No requirements additional to ISO 17065 and [GCR](#).

### 5 Resource Requirements

No requirements additional to ISO 17065 and [GCR](#).

#### 5.1 Personnel

##### Guidance 5.1

This section details the additional competency and qualification criteria for CoC auditors, Group CoC auditors and CAB lead CoC auditors as referred to in [GCR section 6.1](#).

5.1.1 CABs shall ensure that:

- 5.1.1.1 At least one of their CoC auditors is designated as the CAB lead auditor;
- 5.1.1.2 The CAB lead auditor has the qualifications and competencies detailed in [Table 2](#) in addition to those listed in [Table 1](#);
- 5.1.1.3 The CAB lead auditor mentors and/or trains all other CoC auditors at the CAB to ensure they are familiar with third party management system conformity assessment auditing techniques;
- 5.1.1.4 All CoC auditors comply with [Table 1](#);
- 5.1.1.5 Auditors undertaking Consumer-Facing Organisation (CFO) audits are not new auditors as described in [Table 1](#), criteria 4b;
- 5.1.1.6 CoC auditors audit an individual client for a maximum of 6 consecutive years and appoint an alternative auditor in the seventh year.

##### Guidance 5.1.1.6

After the 6th consecutive year of auditing a client, the auditor must wait at least one year before auditing the same client again.

5.1.2 Group CoC auditors who audit the central office's operations shall, in addition to [5.1.1.4](#), comply with:

- 5.1.2.1 Group CoC central office auditor qualification and competency criteria as detailed in [Table 3](#);
- 5.1.2.2 Where there is more than one auditor conducting a group central office CoC audit, at least one auditor shall meet each of the requirements in [Row s 1, 2 and 3 in Table 3](#).

**Table 1: CoC auditor qualification and competency criteria**

<b>1. General</b>	
Qualifications	<ul style="list-style-type: none"> <li>a. 5 years' work experience, including 2 years in of any of the following: food industry; supply chain management; science; traceability; policy development; or</li> <li>b. Degree or equivalent in business, economics, science or technical programme and 3 years' work experience including 2 years food-related in supply chain management, science, traceability or policy development. Examples of technical qualifications include: supply chain and logistics management, food/seafood science and fisheries science.</li> </ul>
Competencies	<ul style="list-style-type: none"> <li>c. To demonstrate knowledge of food safety or quality systems management, product or supply chain risk assessment, traceability systems and relevant national and international laws relating to product labelling and traceability;</li> <li>d. An understanding of fish and fish products and their supply chains, and the type of supply chain operation to be audited;</li> <li>e. The ability to manage relationships with colleagues and clients.</li> </ul>
Verification Mechanisms	<ul style="list-style-type: none"> <li>f. CV;</li> <li>g. Previous employer's reference letter;</li> <li>h. CAB appraisal;</li> <li>i. Diploma or certificate;</li> <li>j. Confirmation of previous work experience.</li> </ul>
<b>2. Third-Party Product and Management System Conformity Assessment Auditing Techniques</b>	
Qualifications	None applicable.
Competencies	<ul style="list-style-type: none"> <li>a. The ability to apply appropriate audit principles, procedures and techniques to the planning and execution of different audits so that audits are conducted in a consistent and systematic manner;</li> <li>b. Be able to verify the accuracy of collected information and be aware of the significance and appropriateness of audit evidence to support audit findings and conclusions;</li> <li>c. Understand and assess those factors that can affect the reliability of the audit findings and conclusions.</li> </ul>
Verification Mechanisms	<ul style="list-style-type: none"> <li>d. CAB training records;</li> <li>e. Previous audit reports;</li> <li>f. Accreditation body witness or office audits;</li> <li>g. CAB on-site observations, review of audit reports and feedback from clients.</li> </ul> <p><b>Guidance</b></p> <p>As per ISO 17021, the documented monitoring procedures for auditors shall include a combination of on-site observation, review of audit reports and feedback from clients. This monitoring shall be designed in such a way as to minimise disturbance to the normal processes of certification.</p>
<b>3. Understanding of MSC CoC Standard and MSC CoC Certification Requirements (CoC CR)</b>	
Qualifications	<ul style="list-style-type: none"> <li>a. Prior to conducting MSC CoC audits, pass the MSC's CoC online training and re-take this course at least once every 3 years;</li> </ul>

	<ul style="list-style-type: none"> <li>b. Pass the MSC's auditor training on updates to the CoC CR within 90 days of the effective date of new requirements and prior to undertaking audits against the new requirements.</li> </ul>
Competencies	<p>The ability to:</p> <ul style="list-style-type: none"> <li>c. Describe the eligibility, intent, and requirements of the different versions of the CoC Standard;</li> <li>d. Determine who needs Chain of Custody and demonstrate this practically.</li> <li>e. Describe the main steps in an MSC CoC audit;</li> <li>f. Demonstrate an understanding of how the scheme's database can be used to extract relevant information and the information required for entry into this database;</li> <li>g. Identify and assess potential risks to traceability during food production, distribution, preparation, storage, trading and transportation throughout the chain;</li> <li>h. Demonstrate an understanding of the principles of the HACCP or other food management systems which are applicable to the MSC CoC Standard;</li> <li>i. Assess the effectiveness of traceability systems employed by organisations and their subcontractors, and describe where the latter is relevant;</li> <li>j. Assess the adequacy of records verified as part of the audit;</li> <li>k. Recognize the risks of compromising traceability associated with different seafood species and activities;</li> <li>l. Describe how to: <ul style="list-style-type: none"> <li>i. Conduct an audit when certified product is not on-site;</li> <li>ii. Conduct a remote audit.</li> </ul> </li> <li>m. Demonstrate an understanding of how to grade non-conformities and the causes of a certificate suspension and withdrawal;</li> <li>n. Describe: <ul style="list-style-type: none"> <li>i. The main steps in the fisheries assessment process;</li> <li>ii. Where to find sources of information about which fish can enter chains of custody, fishery certificate sharing agreements and how this impacts the eligibility of certified products and which parties are eligible to handle under-assessment product.</li> </ul> </li> </ul>
Verification Mechanisms	<ul style="list-style-type: none"> <li>o. Examination pass;</li> <li>p. Accreditation body witness or office audits;</li> <li>q. CAB on-site observations, review of audit reports and feedback from clients.</li> </ul> <p><b>Guidance</b> See guidance on Verification Mechanism in row 2 <a href="#">Table 1</a>.</p>
<b>4. Audit Experience</b>	
Qualifications	<ul style="list-style-type: none"> <li>a. Have undertaken 4 initial or surveillance MSC CoC audits or audits for equivalent standards; or</li> <li>b. For new CoC auditors: <ul style="list-style-type: none"> <li>i. Witness or participate in 2 MSC CoC audits or audits for equivalent standards; and</li> <li>ii. Conduct at least 2 satisfactory MSC CoC audits or audits for equivalent standards under the direction and guidance of a lead auditor prior to undertaking solo audits.</li> </ul> </li> </ul> <p><b>Guidance</b> Equivalent standards are those which include a significant component of traceability including: GFSI-approved standards, GlobalGAP aquaculture standard and ISO 2200.</p>
Competencies	<p>The ability to:</p>

	<ul style="list-style-type: none"> <li>c. Identify and find the location of the information required for undertaking and completing each assessment / audit;</li> <li>d. Reconcile document discrepancies and investigate the causes of these;</li> <li>e. Detect commonly used methods of document manipulation, fraudulent actions and fraudulent practices;</li> </ul>
Verification Mechanisms	<ul style="list-style-type: none"> <li>f. CAB records;</li> <li>g. Previous employer's reference letter;</li> <li>h. Accreditation body witness or office audits;</li> <li>i. CAB on-site observations, review of audit reports and feedback from clients;</li> <li>j. Previous audit reports.</li> </ul> <p><b>Guidance</b> See guidance on Verification Mechanism in row 2 <a href="#">Table 1</a>.</p>
<b>5. On-Going Audit Participation</b>	
Qualifications	<ul style="list-style-type: none"> <li>a. Should participate in 3 MSC CoC audits every 18 months which can include the audits listed in <a href="#">section 4</a> above.</li> </ul>
Competencies	<p>The ability to:</p> <ul style="list-style-type: none"> <li>b. Identify the information required for undertaking and completing each assessment / audit;</li> <li>c. Reconcile document discrepancies and investigate the causes of these;</li> <li>d. Detect commonly used methods of document manipulation, fraudulent actions and fraudulent practices.</li> </ul>
Verification Mechanisms	<ul style="list-style-type: none"> <li>e. CAB records;</li> <li>f. Previous employer's reference letter;</li> <li>g. Accreditation body witness or office audits;</li> <li>h. CAB on-site observations, review of audit reports and feedback from clients;</li> <li>i. Previous audit reports.</li> </ul> <p><b>Guidance</b> See guidance on Verification Mechanism in row 2 <a href="#">Table 1</a>.</p>
<b>6. On-site observations</b>	
Qualifications	<ul style="list-style-type: none"> <li>a. Has been peer witnessed by a qualified CoC lead auditor during an MSC CoC audit or an audit for equivalent standards that include a significant component of traceability. This must be done at least once in each 3 year period where the peer witness may be part of the audit team.</li> </ul> <p><b>Guidance</b> Equivalent standards are those which include a significant component of traceability including: GFSI-approved standards, GlobalGAP aquaculture standard and ISO 2200.</p>
Competencies	None applicable.
Verification Mechanisms	<ul style="list-style-type: none"> <li>b. CAB training records;</li> <li>c. CAB on-site observations, review of audit reports and feedback from clients.</li> </ul> <p><b>Guidance</b> See guidance on Verification Mechanism in row 2 <a href="#">Table 1</a>.</p>
<b>7. Communication &amp; Stakeholder Facilitation Skills</b>	

Qualifications	a. Experience in applying different types of interviewing and facilitation techniques.
Competencies	b. The ability to effectively communicate with the client and other stakeholders.
Verification Mechanisms	c. CV; d. CAB records; e. Accreditation body witness or office audits; f. CAB on-site observations, review of audit reports and feedback from clients.  <b>Guidance</b> See guidance on Verification Mechanism in row 2 <a href="#">Table 1</a> .

Table 2: CAB lead auditor qualification and competency criteria

1. Third-Party Product and Management System Conformity Assessment Auditing Techniques	
Qualifications	a. Pass IRCA / RABQSA recognised EMS / QMS or GFSI-approved standards or HACCP lead assessor training course; or b. Registration as an EMS / QMS auditor with IRCA or RABQSA; or c. Pass a course on auditing based upon ISO 19011 with a minimum duration of 3 days.
Competencies	d. The ability to apply appropriate audit principles, procedures and techniques to the planning and execution of different audits so that audits are conducted in a consistent and systematic manner; e. Be able to verify the accuracy of collected information and be aware of the significance and appropriateness of audit evidence to support audit findings and conclusions; f. Understand and assess those factors that can affect the reliability of the audit findings and conclusions; g. Be able to manage a CoC audit team in accordance with MSC requirements.
Verification Mechanisms	h. Certificate of passing auditor training course recognised by a reputable auditor registration organisation e.g., IRCA, RABQSA; i. Previous audit reports; j. Accreditation body witness or office audits CAB on-site observations, review of audit reports and feedback from clients.  <b>Guidance</b> See guidance on Verification Mechanism in row 2 <a href="#">Table 1</a> .

Table 3: Group CoC central office auditor

1. Group Audit Training	
Qualifications	a. Prior to conducting MSC CoC group audits, pass MSC's Group CoC auditor training course and re-take this course at least once every 3 years; b. Pass MSC's online training on updates to Group CoC requirements within 90 days of the effective date of new versions of the requirements and prior to undertaking group audits against the new requirements.
Competencies	Ability to: c. Demonstrate an understanding of the CoC Standard: Group version; d. Assess conformity against the Group requirements in <a href="#">section 10</a> of this document (Additional requirements for Group CoC Certification); e. Describe the key steps in an MSC Group CoC audit;

	f. Determine the appropriate sample size for group site audits at initial and surveillance audits.
Verification Mechanisms	<p>g. Examination pass; h. Accreditation body witness or office audits; i. CAB on-site observations, review of audit reports and feedback from clients; j. CAB training records.</p> <p><b>Guidance</b> See guidance on Verification Mechanism in row 2 <a href="#">Table 1</a>.</p>
<b>2. Management Systems and Reference Documents</b>	
Qualifications	<p>a. 50 days' auditing experience for MSC CoC audits or equivalent standards, of which at least 15 days are auditing experience as a team member for management system related standards, which may include MSC group CoC audits.</p> <p><b>Guidance</b> Management system related standards in this context means standards where there is a high degree of reliance on management systems to ensure product conformity. These standards include requirements for internal audits, a management review and self-corrective action to address any problems identified in the audit and review, such as ISO 9001 and 14001.  Equivalent standards are those which include a significant component of traceability including: GFSI-approved standards, GlobalGAP aquaculture standard and ISO 22000</p>
Competencies	<p>Ability to:</p> <p>b. Show a detailed knowledge of management system standards, applicable procedures or other management system documents used as audit criteria; c. Apply management system principles to different organisations and to understand the interaction between components of the management system; d. Understand and act upon differences between and the priority of reference documents and understand the need to apply specific reference documents to different audit situations; e. Demonstrate knowledge of information systems and technology for authorisation, security, distribution and control of documents, data and records.</p>
Verification Mechanisms	<p>f. CV; g. Previous employer's reference letter; h. Accreditation body witness or office audits; i. CAB on-site observations, review of audit reports and feedback from clients.</p> <p><b>Guidance</b> See guidance on Verification Mechanism in row 2 <a href="#">Table 1</a>.</p>
<b>3. Audit Experience</b>	
Qualifications	<p>Prior to undertaking solo group CoC audits either:</p> <p>a. Have led at least one group CoC audit for MSC or equivalent standards under the direction, guidance and supervision of an MSC group central office audit; or</p>



	b. Witness or participate in one MSC group CoC audit or group audit for equivalent standards under the direction and guidance of a group CoC central office auditor.
Competencies	c. None applicable;
Verification Mechanisms	d. Accreditation body witness or office audits; e. CAB on-site observations, review of audit reports and feedback from clients; f. CAB training records.  <b>Guidance</b> See guidance on Verification Mechanism in row 2 <a href="#">Table 1</a> .

## 6 Process Requirements

### 6.1 Need for CoC certification

6.1.1 The CAB shall evaluate each applicant to determine the need for CoC certification using the criteria below:

6.1.1.1 Certification is a requirement for all organisations that take legal ownership of certified products except in the following circumstances:

#### Guidance 6.1.1.1

Organisations are considered to be legal owners if they issue invoices related to the sale of certified products and collect payment for the sale of certified products, or are able to demonstrate their financial ownership of certified materials based on other documentation (such as internal transfer slips, contracts or deeds). Applicants that do not take ownership can choose to become certified if they wish.

Organisations that are trading or handling products from certified fisheries or farms but do not ever identify or sell these as products as 'certified' or with the certified claim will not require CoC certification.

- a. Organisations that only purchase, handle, and sell certified products in consumer-ready tamper-proof packaging (CRTPP).
  - i. CABs shall use the [decision tree in Figure 1](#) to verify whether products are in CRTPP.
- b. Organisations that receive certified product in CRTPP and open the package only for the purpose of heating or placing on a plate before serving to a final consumer.

#### Guidance 6.1.1.1.b

This might include airlines that receive individually portioned meals and only open the packaging for heating and serving to passengers.

If an organisation receives product in CRTPP, but opens the package for purposes other than in [6.1.1.1 b](#), CoC certification is required. This could happen for example where a restaurant buys CRTPP product



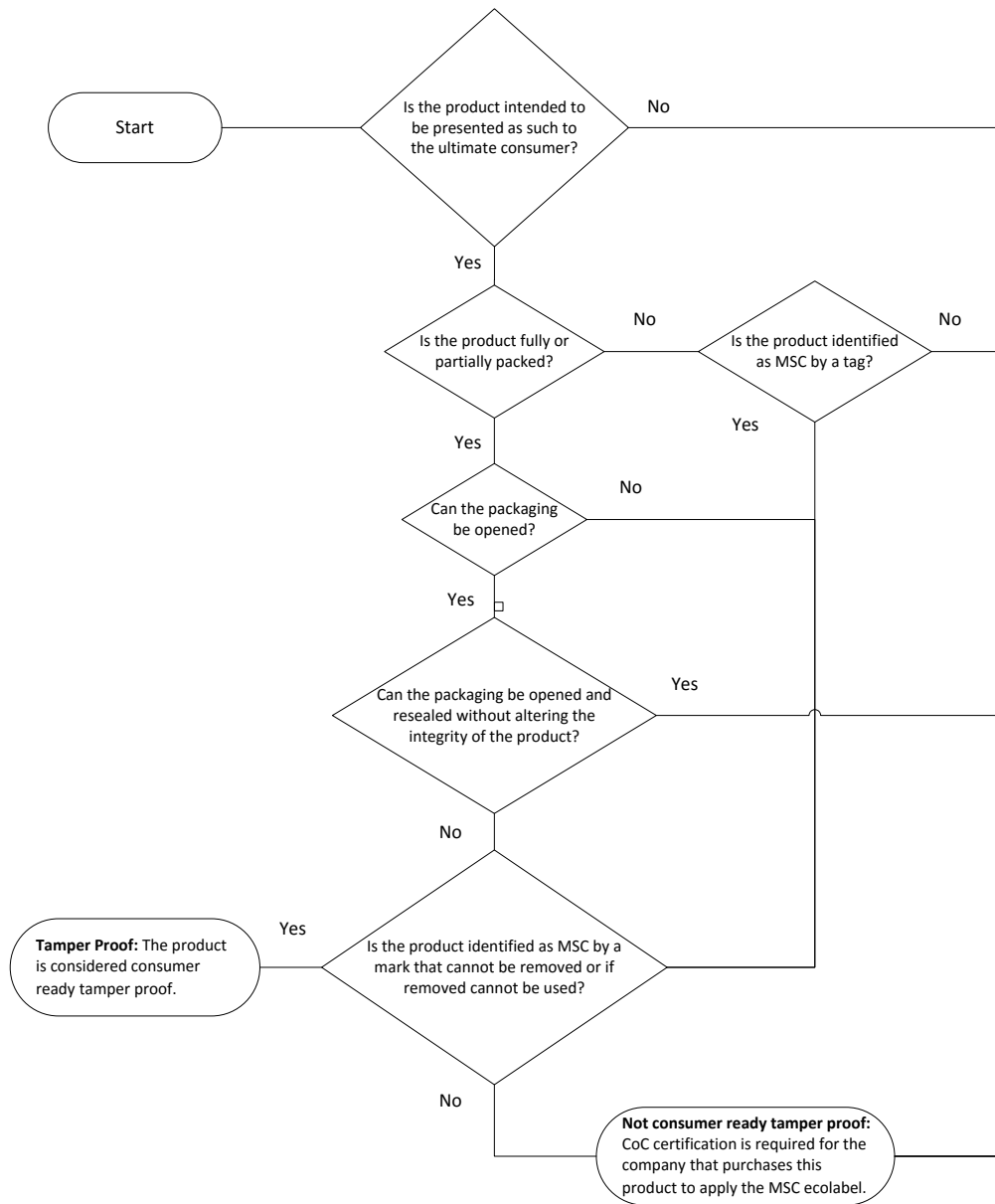
from a wholesale retailer and then opens the product for further preparation before serving.

- c. Entities that are identified by reference to or on a valid fishery or farm certificate.

**Guidance 6.1.1.1c**

Entities identified by reference to or on a fishery certificate could consist of agents, auctions, unloaders or others that handle certified fish in the proximity of the point of landing or first sale. The Public Certification Report for the fishery will clearly state that these entities are included in the fishery certificate and either list the specific entities, the eligibility criteria or where to find this information. The Public Certification Report will also clearly state the point in the supply chain from which CoC is required; please refer to clause 7.19.4 and subclauses in the [FCR v2.0](#). Any similar entities not specifically referenced in the fishery certificate will require CoC certification.

Figure 1: Decision tree for consumer-ready tamper-proof packaging (CRTPP)



## 6.2 Certification options

6.2.1 There may be several certification options available to an applicant.

6.2.1.1 The CAB shall evaluate each applicant to determine which certification option(s) the applicant is eligible for and which option will be best suited to their needs.

Table 4: Options for certification

	Certification options	Applies to
1	Single	Organisations operating out of one site (a single location with one physical address).. This will typically opt for certification against the <a href="#">Default CoC Standard</a> unless eligible for the <a href="#">CFO CoC Standard</a> or included in a group CoC certificate.
2	Multi-site	Organisations handling or trading certified products at more than one location (physical address). All sites are individually audited against the <a href="#">Default CoC Standard</a> , although not all requirements would necessarily apply to all sites. One CoC code and certificate are shared across all sites. For example, a company with 2 processing sites and one trading office might be certified as a multi-site.
3	Group	Organisations with numerous locations – this could be a group of individual enterprises or one company with numerous sites. Under this option, the group designates a central office function that establishes internal controls and is responsible for site compliance. The CAB audits the central office and a sample of sites against the <a href="#">Group CoC Standard</a> , instead of every site receiving an audit as in a multi-site certificate. One CoC code and certificate are shared across all sites. Specific eligibility for Group CoC certification is included in section <a href="#">6.2.2</a> .
4	Consumer-facing Organisations	Organisations that serve or sell seafood exclusively or primarily to the final consumer (typically in a retail or foodservice environment). Consumer-Facing Organisations (CFOs) can be a single site operation or have numerous locations and can be audited against the <a href="#">CFO CoC Standard</a> . This might include restaurants, restaurant chains, fish counters and caterers. Specific eligibility for CFO CoC certification is included in section <a href="#">6.2.3</a> .

### Guidance 6.2.1

For some clients, multiple certification options will be applicable. For example, a small restaurant chain with 3 sites could be audited against the [Default CoC Standard](#) as a multi-site, the [Group CoC Standard](#) or the [CFO CoC Standard](#). It is up to the CAB and client to decide which CoC Standard and certificate option is the best fit for the organisation.

For both single and multi-site certificates, the client is certified against the [Default CoC Standard](#).

### Eligibility for Group CoC certification

6.2.2 The CAB shall determine that an applicant is eligible for certification against the [Group CoC Standard](#) if all the following criteria are met:

- 6.2.2.1 The proposed group's central office is a legal entity with whom a contract can be made.
- 6.2.2.2 All sites undertake substantially similar activities as defined by MSC Chain of Custody activities (see [Table 5](#)); or if they do not, the group can be stratified for sampling according to the requirements specified in [section 8.2](#).

- 6.2.2.3 The entire group operation is within one geographic region; or if they are not, the group can be stratified for sampling.
- 6.2.2.4 The same written language is used at all sites and can be read by all site managers or, if translations are provided, adequate document control procedures are in place to ensure version consistency across different languages.
- 6.2.2.5 The proposed group's central office is capable of objectivity in audit and decision making.
- 6.2.2.6 The proposed group's central office can demonstrate through their application an understanding of the [Group CoC Standard](#) such that it is likely that they will be able to qualify for certification.

### Eligibility for Consumer-Facing (CFO) certification

- 6.2.3 The CAB shall determine that an applicant is eligible for certification against the [CFO CoC Standard](#) if all the following applicable criteria are met:

- 6.2.3.1 The organisation sells and/or serves certified seafood exclusively or primarily to final consumers.

#### Guidance 6.2.3.1

In general, the [CFO CoC Standard](#) is designed for organisations selling to final consumers only. However, in some specific cases organisations that sell to both businesses and final consumers may be eligible to be certified against the [CFO CoC Standard](#) (this might include 'cash and carry' wholesalers or fish mongers that sell to a small number of restaurants as well as final consumers). In these cases, to be eligible the client needs to demonstrate that sales to final consumers (i.e., by volume or value) are greater than sales to other businesses.

- 6.2.3.2 Any sites that carry out processing or repacking of certified seafood do so exclusively on behalf of the applicant organisation.
- 6.2.3.3 If the organisation uses contract processors or repackers, these organisations have their own CoC certification.
- 6.2.3.4 If the applicant has more than one site handling certified seafood:
  - a. All sites are under the control of a common management system maintained by the organisation's central office;
  - b. The central office has an ownership or franchise relationship with each site, or a temporary right to manage all sites and staff where certified seafood is handled; and
  - c. Purchases of certified seafood are controlled by the central office, with controls to ensure that all sites can only order certified seafood from certified suppliers.

#### Guidance 6.2.3.4

Applicants for consumer-facing certification may have sites that carry out processing or repacking activities; however these sites must be dedicated to handling certified seafood on behalf of the applicant organisation only. Sites cannot process or repack certified seafood for other organisations or customers – otherwise they need to be certified against the [Default CoC Standard](#).

A temporary right to manage a site means the organisation has direct control over the staff working at site level. This is mainly applicable to catering operations.

### Eligibility for interim certification

- 6.2.4 The CAB shall determine if the applicant is seeking interim certification against any of the certification options.

#### Guidance 6.2.4

The interim certification option is available in cases where exceptional circumstances make it impossible or highly impractical to carry out an audit prior to allowing the applicant to sell certified products.

Permission for interim certification may be granted by the MSC (on the basis of a recommendation from the CAB) for up to 90 days providing that the risk is low and adequate controls are in place.

- 6.2.5 If interim certification is being sought, the CAB shall verify that:
- 6.2.5.1 There are exceptional circumstances making it impossible to carry out an on-site audit.
  - 6.2.5.2 A risk assessment has been completed considering all potential risks of substitution or mixing between certified and non-certified products and how these risks will be mitigated.

#### Guidance 6.2.5.2

The MSC intends that CABs use their own judgment to determine risk factors as they may vary significantly between cases where interim certification is requested.

- 6.2.5.3 Risks to the integrity of certified products have been determined to be minimal.
- 6.2.6 If the CAB is satisfied that interim certification is appropriate it shall:
- 6.2.6.1 Inform the applicant that the MSC is not responsible for any costs associated with lapsing of an interim certificate prior to a CoC certificate being obtained.
  - 6.2.6.2 Apply for interim certification on the scheme database, providing the following:
    - a. The proposed scope of certification;
    - b. A written justification of the exceptional circumstances and risk assessment as per [6.2.5](#); and

- c. A full timetable for further action, including timing of audit(s) to be held within 90 days.
- 6.2.7 Once the MSC has decided whether to allow the interim certificate, the CAB shall inform the client of this outcome.

### Ineligibility for certification

- 6.2.8 The CAB shall check if applicants for CoC certification:
  - 6.2.8.1 Have had their certificate withdrawn within the last 2 years.
    - a. The CAB shall not issue a new certificate until at least 2 years from the date that the certificate was withdrawn.
  - 6.2.8.2 Have had their certificate suspended within the last 6 months :
    - a. For intentional and/or systematic causes as determined by [GCR 7.4.10](#), the CAB shall not issue a new certificate until at least 6 months from the date of suspension.
    - b. Where the certificate holder has cancelled their certificate during suspension, the CAB shall not issue a new certificate until at least 6 months from the date of suspension.

#### Guidance 6.2.8

CoC certificates are withdrawn only after a second suspension during a 3 year CoC certificate, as determined by [GCR 7.4.11.3](#).

The certificate statuses of “withdrawn” and “suspended” are visible on the MSC website [Find a Supplier page](#). [GCR 4.11](#) details requirements to be followed for certificate transfers between CABs.

- 6.2.9 The CAB shall require the applicant to declare any association to entities that have been successfully prosecuted for a forced labour violation.

#### Guidance 6.2.9

Entities refers to companies, their sites and subcontracted parties.

- 6.2.9.1 If an entity belonging to or currently contracted by an applicant has been successfully prosecuted for violations of laws on forced labour in the last 2 years, this entity shall not be allowed to continue in the CoC certification process.
    - a. Where an applicant no longer holds a valid contract with a subcontractor that fulfils the criteria in [6.2.9.1](#), the applicant shall be allowed to continue in the CoC certification process.

**Guidance 6.2.9.1.a**

This requirement aims to ensure that the CoC applicant does not include an entity that has been successfully prosecuted for violations against forced labour laws. The International Labour Organisation definition of forced labour comprises two key elements:

- Work or service is exacted under the menace of a penalty, which can imply monetary sanctions, physical punishment or the loss of rights and privileges or restriction of movement (e.g., refusing to allow free access to identity documents);
- Work is not voluntary.

Other unethical practices considered by the ILO to fall under the category of forced labour include debt bondage, human trafficking and other forms of modern slavery.

In order to ensure that a certified entity does not fall out of scope on account of forced labour violations, companies, sites within companies and their subcontracted parties are advised to ensure compliance with national and international laws on forced labour and follow relevant guidance where available.

## 6.3 Application

6.3.1 Having established the recommended option for CoC certification and confirmed the applicant's eligibility to proceed with certification, the CAB shall request information from the applicant to determine:

- 6.3.1.1 The proposed scope of certification;
- 6.3.1.2 The names of certified suppliers, if known;
- 6.3.1.3 Names of subcontractors that would handle certified product;
- 6.3.1.4 The proposed list of sites to be covered by the certificate, if relevant.

### Scope of certification

6.3.2 The CAB shall define the proposed scope of the certification with the applicant by identifying:

- 6.3.2.1 The certified species that are to be purchased or handled;
- 6.3.2.2 The activities to be undertaken with respect to certified products, as per the definitions found in [Table 5](#);
- 6.3.2.3 Whether the applicant intends to handle products certified under other recognised certification schemes that share the MSC's Chain of Custody program.

**Guidance 6.3.2.3**

The specific certified fisheries/farms from which the applicant is sourcing do not need to be included in the scope of certification. Species and activities can be recorded without association to each other in the certification scheme database and the [CoC audit checklist](#).

Where applicants intend to handle products originating from fisheries or farms that are certified under schemes other than the MSC (but which share the CoC Standards) this will be treated as a scope extension. For example, if the applicant wants to handle ASC-certified products, the CAB will need to issue a separate ASC certificate for the client but can complete a single CoC audit.

**Table 5: Activity scope definitions**

	Activity	Definition
1	Trading fish (buying/selling)	This will likely be in nearly every company's scope, with the exception of subcontractors that do not take legal ownership of the product. In most instances, an additional activity will also be selected for this client, unless they are solely a 'trader'. If the client physically handles products, they will also need to have 'storage', 'wholesale' or 'distribution' selected.
2	Transportation	This shall be used if a client is responsible for the transport of certified product from their supplier, to their customer or between their sites. This is not used if the client subcontracts all transportation.  Transportation companies are not required to be certified for CoC, unless they also take legal ownership. In some cases, however, using a transport company could increase the risk to such a level that the CAB might require its client to request the transport company to become CoC certified (e.g., a vessel involved in transshipping).
3	Storage	This refers to product being held in a storage area by a company before processing, distributing or selling and after processing. This will also likely be included in many of the clients' scopes as they will be storing fish before processing/distributing/selling it and after processing it.
4	Distribution	Distribution shall be used for companies that receive sealed containers, pallets, etc., that may or may not be broken down into smaller sealed units, and DELIVER them to customers or other members of their group, i.e., they take possession, but not ownership.
5	Wholesale	Wholesale shall be used for companies that receive sealed containers, pallets, etc., that may or may not be broken down into smaller sealed units, and SELL them to customers or other members of their group, i.e., they take ownership and possession.
6	Harvest	This shall be used when fishing vessels are being certified. If they are processing on-board, 'processing' should also be selected.



7	Packing or repacking	This shall be used when packaging is changed but the product remains the same. It is assumed that companies processing will also be packing, so it is not necessary to select packing as well as processing. If a company receives product from a processing company for the sole reason of packing it into a specific type of pack, this scope category applies.
8	Processing	To include all examples of processing including primary processing, secondary processing, value-added processing, fish preparation or any other activity where the product is changed (excluding activities undertaken by '11' and '12' below).
		Primary processing – the first time seafood is changed from its original form as it was harvested. This includes heading and gutting, filleting, de-scaling, shelling, etc.
		Secondary processing – After primary processing, subsequent changes are made to the form of the seafood. This includes preparation of the seafood with other ingredients to manufacture products for foodservice or retail such as breading, adding sauces or breaking down the seafood into smaller components (e.g., loins, mince, oil, etc.)
		Preservation – the long term conservation of seafood. This includes smoking, drying, canning and freezing. This can be done at both primary and secondary processing.
		Other processing – please specify.
9	Contract processing	This refers to any certificate holder that carries out processing on behalf of the product owner (does not take legal ownership of the product).
10	Use of contract processor	This refers to any certificate holder that uses a contract processor to process, repack or transform certified product on their behalf.
11	Retail to consumer	This includes fresh fish counters at retailers, fish mongers, markets selling direct to consumers, where the product will be taken away and prepared before being eaten by a consumer, or when sold in a traditional 'retail' environment.
12	Restaurant / take away to consumer	This includes any foodservice situation such as fish and chip shops, standard restaurants, quick service restaurants, where the product is prepared on-site and sold directly to consumers as 'ready to eat', or eaten on-site.
13	Other	Must be clearly defined and explained how it does not fit into another category.
14	Aquaculture	Shall be used for any entity involved in the farming of aquatic organisms.

## Proposed suppliers

6.3.3 The CAB shall identify whether the applicant's proposed suppliers are certified.

6.3.3.1 If the applicant has listed suppliers that are not certified, the CAB shall inform the client that suppliers need to be certified before the applicant can identify or label any products from the supplier as 'certified' or with trademarks.

## Use of subcontractors

- 6.3.4 The CAB shall document the names of any proposed subcontractors (excluding transportation) that would be handling certified product and whether each subcontractor is certified.
- 6.3.5 If the applicant intends to use certified subcontractors, the CAB shall check that the proposed subcontractor's scope includes the relevant activities.

## Site lists

- 6.3.6 For all certificates that are to cover more than one site, the CAB shall ask the applicant for a current site list that provides both physical and postal addresses.
- 6.3.7 For CFO certificates the list shall classify sites as consumer-facing sites, operations sites or sites that do both and provide contact details for each site.

### Guidance 6.3.7

A consumer-facing site is a discrete physical location that sells or serves certified seafood directly to a final consumer (such as a restaurant or catering site).

An operations site is a discrete physical location that is involved in processing, storage, distribution, packing or repacking of certified products (such as a central warehouse).

A site can be both consumer-facing and operations; for example, a retail site with a fresh fish counter and a warehouse function.

- 6.3.8 For group certificates the list shall include a name or position, and email or phone for a designated contact at each site who is responsible for ensuring the site conforms to Group CoC requirements.

### Guidance 6.3.8

The CAB can begin to populate the CoC audit checklist with information on proposed scope, suppliers, subcontractors and site list at this stage.

## 6.4 Contract

- 6.4.1 The CAB shall provide the applicant with a contract as specified in [GCR 4.8](#).
- 6.4.2 The CAB shall, within 10 days of receiving a signed contract for certification, record the applicant on the scheme database.

### Guidance 6.4.2

The CAB may give the applicant their assigned MSC CoC certification code at this stage or later in the certification process.

## 6.5 Use of trademarks

- 6.5.1 Once entered as an applicant on the database, the CAB shall inform the client that it can use the ecolabel, logo, or other trademarks:
  - 6.5.1.1 Once a license agreement has been signed; and
  - 6.5.1.2 Providing the client complies with the licensing agreement.
- 6.5.2 The CAB shall direct the client to MSCl ([ecolabel@msc.org](mailto:ecolabel@msc.org)) for all enquiries regarding use of the ecolabel or trademarks.

### Guidance 6.5.2

Trademarks include the MSC ecolabel or ASC logo and other trademarks. The CAB may inform the client that packaging can be printed ahead of certification with the trademarks, but that packaging must be approved by MSCl and product cannot be sold as certified or with the trademarks until certification is complete and the certificate status is shown as valid on the [MSC website](http://MSC website).

## 7 Audit Planning

### Guidance 7

These requirements are in addition to those in the [GCR](#) section 7.2. They are relevant to all CoC certificate types and for the planning of every audit (initial, surveillance and recertification).

## 7.1 Requirements for all CoC clients

- 7.1.1 The CAB shall plan on-site and off-site audit activities and duration taking account of:
  - 7.1.1.1 The proposed or actual scope;
  - 7.1.1.2 The management system used by the client;
  - 7.1.1.3 The CoC Standard the client will be audited against;
  - 7.1.1.4 The need to allow sufficient time to verify the effectiveness of the client's management system for the proposed scope;
  - 7.1.1.5 Visits to non-certified subcontractors as required in [section 8.4](#);
  - 7.1.1.6 Any other certifications held;
  - 7.1.1.7 Opportunities to synchronise and combine CoC audits with other audits where possible and appropriate.
- 7.1.2 The CAB shall determine the number and type of sites to be audited as follows:
  - 7.1.2.1 For single and multi-site certificates, every site shall be audited.
  - 7.1.2.2 For CFO CoC certificates, sites shall be audited according to [section 7.2](#).

- 7.1.2.3 For Group CoC certificates, sites shall be audited according to section [10.4](#).
- 7.1.3 CABs shall plan an audit duration of at least 1.5 days on-site for single and multi-site clients that:
  - 7.1.3.1 Include processing or contract processing in their scope as per [Table 5](#); and
  - 7.1.3.2 Are located in a country with a score below 41 in Transparency International's latest Corruption Perception Index (<http://cpi.transparency.org>); and
  - 7.1.3.3 Handle both certified and non-certified seafood; and
  - 7.1.3.4 Purchase in excess of 5,000 MT of seafood or more than 20 seafood batches annually.

#### **Guidance 7.1.3.4**

1.5 days equates to 12 working hours for one auditor and does not include time taken to visit non-certified subcontractors or completing the audit checklist off-site. Clause 7.1.3.4 still applies if a company handles only 100MT annually in 21 batches; or if the company handles 6,000MT in one batch. This total includes all seafood, not only certified products.

- 7.1.4 In exceptional circumstances, the planned audit duration for a company meeting the criteria in [7.1.3](#) may be less than 1.5 days.
  - 7.1.4.1 In these cases, the CAB shall document a justification for the reduced audit time in the audit checklist.
- 7.1.5 The CAB shall ensure that audits are carried out on-site, except for cases described in [7.1.5.1](#) (initial audits) and [11.3.3](#) (surveillance audits).
  - 7.1.5.1 Clients are eligible to become certified through a remote certification audit, provided they meet both the following criteria:
    - a. Do not carry out any activities with respect to certified products other than trading (buying and selling) as defined in [Table 5](#); and
    - b. Do not use any subcontractors to handle certified products, except for transport and/or storage subcontractors, as defined in [Table 5](#).

#### **Guidance 7.1.5.1**

A trading operation or site within a multi-site certificate which meets this criteria could also be audited remotely.

- 7.1.6 The CAB shall verify if the client holds other accredited certifications issued by an accredited CAB to a relevant nationally or internationally-recognised standard.
  - 7.1.6.1 If the client does hold accredited certifications, the CAB may use this as a substantive indication of conformity with relevant elements of the [MSC CoC Standard](#) by:
    - a. Requesting the most recent audit report from the client;
    - b. Undertaking a gap analysis of the differences between the [MSC CoC Standard](#) and the other standard;
    - c. Using knowledge of conformity demonstrated by the other certification to support the CAB's audit and certification decision.

#### Guidance 7.1.6.1

This allows CABs to use the results of assessments conducted for other certification schemes and/or to combine the MSC audit with another audit when elements of the [MSC CoC Standard](#) are covered in other standards / certification requirements.

## 7.2 Additional audit planning for CFO clients

- 7.2.1 The CAB shall complete a risk assessment prior to each audit against the [CFO CoC Standard](#), to determine the audit activities to be carried out.
- 7.2.1.1 Where the client handles exclusively certified seafood at all sites, the CAB shall score the client as Low Risk and plan audit activities in accordance with [Table 8](#).
- 7.2.1.2 In all other cases the CAB shall:
- Score every risk factor using [Table 6](#) and sum the total;
  - Use the total score from Table 6 to determine in [Table 7](#) whether the client is Low Risk or Standard Risk;
  - Plan audit activities in accordance with [Table 8](#), taking into account all the activities listed in [Table 8](#).
- 7.2.2 The CAB shall inform the client that for organisations with multiple sites, the central office and a sample of sites will be audited.
- 7.2.3 Prior to each audit, the CAB shall use [Table 9](#) and the site list provided by the client to determine the number of sites to be visited.
- 7.2.4 The CAB shall select the sites based on the factors below, in decreasing order of importance:
- 7.2.4.1 Site determined for sample by the accreditation body or MSC;
  - 7.2.4.2 Likelihood that certified seafood will be handled on-site;
  - 7.2.4.3 Same site not to be selected for consecutive visits where possible;
  - 7.2.4.4 Logistical considerations: combination of trips, availability of auditors, geographic proximity;
  - 7.2.4.5 Any additional criteria or constraints that would prevent sites from having short notice audits.
- 7.2.5 All operations sites that carry out processing or repacking activities of certified products shall be visited in addition to the sample size determined by [Table 9](#).

#### Guidance 7.2.5

The sample size for site visits can include both operations sites, where relevant, and consumer-facing sites. However, all operations sites that carry out processing or repacking activities need to be visited in addition to the sample size from [Table 9](#). If a site carries out both operations and consumer-facing activities, this counts as one site for sampling.

Table 6: Risk assessment scoring for CFOs

Number	Question	Points	Score
1	How many certified species could be displayed, sold or served at any one site at the same time?		
	More than 1	3	
	1	1	
2	Is there a possibility that certified and non-certified products of the same species, or similar-looking species, could be handled at any site at the same time?		
	Yes	4	
	No	1	
3	Will the label or identifier for certified products be applied by staff at each consumer-facing site (rather than at a central office or centralised operations site)?		
	Yes	3	
	No	1	
4	Have there been one or more major non-conformities issued during the most recent audit?		
	Yes	5	
	No	1	
5	How many sites will be handling certified seafood?		
	3 or more	3	
	1 – 2	1	
6	Does the organisation carry out annual (or more frequent) internal audits at all consumer-facing sites, which include testing the traceability of certified seafood?		
	No	0	
	Yes	-3	
7	Does the organisation have an electronic system that allows all volumes of certified seafood sold/served to final consumers to be reconciled against the volume of certified seafood purchased?		
	No	0	
	Yes	-3	
	Total		

**Guidance Table 6**

Fulfilling the Risk Factors in questions 6 and 7 are not mandatory for CFO clients but will affect their risk scoring and the audit activities that will be carried out.

Table 7: Risk scoring

Total Score from Table 6	Risk level
1 – 12	Low Risk
13 – 18	Standard Risk

Table 8: Risk-based audit activities for CFOs

Audit factor	Low Risk	Standard Risk
Collection of seafood samples at consumer-facing sites (for purposes of product authentication testing)	Not required	Required at surveillance and recertification audits where possible, based on availability of certified species (refer to the <a href="#">MSC Seafood Sampling Procedure</a> for details) Minimum of 1 and maximum of 10 seafood samples in total (across all sites) where sample collection is possible <sup>1</sup>
Traceability test completed to trace certified products on-site from the point of sale/serving back to point of receipt	One traceability test per consumer-facing site visited (where certified products are available)	2 traceability tests per consumer-facing site visited (depending on availability of certified products). Traceability tests must be completed for any product where a product sample is also collected (these count towards the total number carried out)
Percentage of total site visits to be carried out at short notice	10% or at minimum one site if the sample is less than 10	100% (unless short notice access is impossible)

**Guidance Table 8**

The MSC has developed a specific [MSC Seafood Sampling Procedure](#), available for download from the MSC website. This document establishes how auditors need to collect and send product samples for product authentication testing, and identifies the Priority and Optional species that can be tested.

7.2.6 For clients falling into the Standard Risk category, the CAB shall:

- 7.2.6.1 Ensure all auditors can demonstrate knowledge of the latest version of the [MSC Seafood Sampling Procedure](#).
- 7.2.6.2 Compare the species handled by the client with the 'Priority' and 'Optional' species specified in the [MSC Seafood Sampling Procedure](#) to determine if sample collection will be applicable.

<sup>1</sup> Derogation, TAB 24

For clients already certified to the MSC CoC standard as of 20 February 2015, who intend to transition to the CFO CoC standard, this clause will become effective at their second audit against the CFO standard (whether recertification or surveillance). For new applicants looking to be certified against the CFO CoC standard after the 20<sup>th</sup> February 2015, this clause becomes effective at their first surveillance audit.

#### **Guidance 7.2.6.2**

If the client is not handling any of the Priority or Optional species identified in the [MSC Seafood Sampling Procedure](#), samples do not need to be collected, however this needs to be clearly documented in the CoC audit checklist.

- 7.2.7 Where site visits are carried out at short notice as dictated by [Table 8](#), the CAB shall notify the client not more than 48 hours in advance of the specific sites to be visited.

#### **Guidance 7.2.7**

The CAB can inform the client of the day or day(s) when the short notice visits will take place, but can only communicate the names or addresses of the specific sites within 48 hours of the start of the site visits.

The 48 hours refers to 2 working days; this means that over a weekend the CAB should notify the client on a Thursday at the latest for sites to be visited on a Monday.

If short-notice visits are not practicable at some sites (e.g., closed catering sites without public access), then the CAB can select sites for short-notice visits from the remaining sites if possible.

- 7.2.7.1 If there are exceptional circumstances preventing sites being visited at short notice, such as access constraints, the CAB may reduce the number of short-notice site visits but shall provide a full justification in the audit checklist.



**Table 9: Site sampling for Consumer-Facing Organisations**

Total number of sites	Number of sites to be visited during an audit	
	Initial audit	Surveillance/ recertification audit
1 to 6	1	1
7 to 9	2	2
10 to 16	2	2
17 to 25	3	2
26 to 36	3	2
37 to 49	4	2
50 to 64	4	2
65 to 84	5	2
85 to 100	5	2
101 to 121	6	2
122 to 144	6	2
145 to 169	7	3
170 to 196	7	3
197 to 225	8	3
226 to 256	8	3
257 to 289	9	3
290 to 324	9	3
325 to 361	10	3
362 to 400	10	3
401 to 441	11	4
442 to 484	11	4
485 to 529	12	4
530 to 576	12	4
577 to 625	13	4
626 to 676	13	4
677 to 729	14	5
730 to 784	14	5
785 to 841	15	5
842 to 900	15	5
901 to 961	16	5
962 to 1024	16	5
Over 1024	Square root multiplied by 0.2, rounded up	Square root multiplied by 0.15, rounded up

**Guidance Table 9**

These site numbers are in addition to the central office audit. Large organisations with over 1024 sites, falling in the last category, have a relatively lower number sample size using the indicated calculation. This is due to the fact very large organisations generally have advanced control and monitoring systems already in place, which can justify a lower number of site visits.

## 8 Evaluation

### 8.1 Requirements for all CoC audits

8.1.1 The auditor shall use the relevant CoC audit checklist to evaluate the client at initial, surveillance and recertification audits.

8.1.1.1 Auditors shall evaluate the client against the same requirements for initial, surveillance and recertification audits.

**Guidance 8.1.1**

All CoC audit checklists can be found on the MSC website.

In general, one CoC audit checklist can be prepared for audits of companies that seek both MSC-certified and ASC-certified products within their scope. There is no need to complete a separate checklist.

### 8.2 Evaluation for single, multi-site and group CoC audits

**Guidance 8.2**

One CoC audit checklist can be completed for a multi-site certificate by verifying only the relevant requirements at each site. For example, the auditor can assess segregation of certified and non-certified seafood at sites taking physical possession of certified products, but may not be able to conduct a full input/output reconciliation at this site if all records are held at the trading office.

#### Opening meeting, gathering information, and procedures

8.2.1 Remote audits shall assess applicants against the same criteria and requirements as an on-site audit.

8.2.2 All audits shall begin with an opening meeting, at which auditors shall confirm with the client all of the following as a minimum:

- 8.2.2.1 Continued eligibility for CoC certification as per clause [6.2.9](#);
- 8.2.2.2 Continued eligibility for group certification against [6.2.2](#), where relevant;
- 8.2.2.3 Participant introductions and roles;
- 8.2.2.4 The purpose of the audit;

- 8.2.2.5 The audit plan, including how the audit activities will be undertaken and any visits to other sites and/or subcontractors;
- 8.2.2.6 The access required and the type of information needed;
- 8.2.2.7 Confidentiality of the information shared during the audit;
- 8.2.2.8 The proposed scope of certification;
- 8.2.2.9 The list of certified suppliers;
- 8.2.2.10 The list of any subcontractors that are or will be handling certified products and w hich ones are independently certified.
  - a. If applicable, the list of certified companies for which the client conducts contract processing of certified products.

#### Guidance 8.2.2

There may be other points to be covered at the opening meeting as relevant, such as vocabulary and definitions. The opening meeting is also an opportunity for the auditee to ask any questions about the [MSC CoC Standard](#) or the audit process.

If the audit is remote, this may be carried out either on a call, video conference or through an initial email exchange.

Clients are not required to have identified all suppliers and are not required to be handling all of the products listed in the potential scope at the initial audit.

- 8.2.3 For each of the activities listed in the proposed scope, the CAB shall collect and review evidence that the client's management system and procedures, as recorded and implemented, meet the requirements of the relevant version of the [MSC CoC Standard](#).

#### Guidance 8.2.3

If the client is not handling products listed in the proposed scope at the time of the audit, the CAB can collect evidence that the system in operation conforms to the [MSC CoC Standard](#) for one or more sample products similar to those in the proposed scope. For example, if a client has certified pollock and hake in scope but is processing non-certified cod and prawns during the audit, the CAB would probably want to focus on the handling of cod during the audit as it is most similar to the certified species in scope.

- 8.2.4 Auditors shall review the content and implementation of procedures relevant to CoC.

#### Guidance 8.2.4

Examples of procedures could include written protocols for maintaining segregation, procedures of purchasing of certified products, employee training manuals, etc.

- 8.2.4.1 If the client is carrying out contract processing activities for certified products, the auditor shall review the relevant procedures to ensure that contract processing is undertaken in conformity with CoC requirements.

- 8.2.5 During the audit, auditors shall review records relating to the receipt, sale and any applicable physical handling of the products listed in the proposed scope.

## Interviews

- 8.2.6 Auditors shall interview responsible personnel to verify their competency in understanding and applying the relevant [MSC CoC Standard](#).
- 8.2.6.1 The number of interviews carried out shall reflect the size of the organisation, the complexity of operations, and the range of staff who could affect the integrity of certified products.
- 8.2.6.2 Interviews shall be used to determine if personnel understand the relevant process or procedure which ensures conformity with the CoC Standard.
- 8.2.6.3 Interview questions shall not be leading.

### Guidance 8.2.6.3

Refer to ISO 19011 for guidance on interviewing. Interviews may include (but are not limited to) management staff as well as employees who are responsible for buying and selling certified products, conducting goods-in checks at point of receipt, applying product identification or labels, selecting batches of certified products for production, managing traceability records, and selecting packaging for certified products.

## Segregation

- 8.2.7 Auditors shall establish that appropriate measures are taken by the client to segregate, identify and prevent mixing between:
- 8.2.7.1 Certified and non-certified seafood;
- 8.2.7.2 Where relevant, between seafood certified to other recognised schemes sharing MSC CoC.
- 8.2.8 If subcontractors are used, auditors shall verify that appropriate systems are in place to ensure identification and traceability of certified products at point of dispatch and receipt.

### Guidance 8.2.8

In a remote audit, segregation and identification may be demonstrated by photographs or a description of the procedures.

## Record-verification exercises

- 8.2.9 Auditors shall conduct the following record-verification exercises, relating to certified products (or similar non-certified product):
- 8.2.9.1 Traceability tests on a batch or batches of product sold or ready for sale.
- a. The test shall link input to output or vice versa through unique lots or delivery numbers, internal traceability records, purchase records (that identify the supplier(s), the lots or batches of purchase), handling records and supply records.
- 8.2.9.2 Cross-checks of a sample of purchase records with delivery records and where possible, against the actual product received.

- a. Include the following records where relevant: bills of lading, invoices, delivery notes, health certificates / veterinary checks, catch certificates, purchase orders and packing list / loading records.
- 8.2.9.3 Input-output reconciliation based on a time-period and/or batch of product.
  - a. This exercise shall include calculation of the yield if relevant, and consideration of whether this is justifiable
- 8.2.10 Auditors shall determine the number of samples or products to use for record verification exercises, ensuring this sample is:
  - 8.2.10.1 Of the auditor's choice and obtained whilst on-site, or during the same day as a remote audit;
  - 8.2.10.2 Of sufficient number to:
    - a. Take into consideration the range of different handling processes, species in scope and responsible parties;
    - b. Be confident that the system is effective for all the products listed in the potential scope;
    - c. Include checking traceability and/or volume records for product sent to and received from subcontractors, if applicable;
    - d. Include records of any contract processing where relevant.
- 8.2.11 For records requested in 8.2.9, the auditor should set a time limit for receipt during the audit and raise a non-conformity if this is not met.

#### Guidance 8.2.9 - 8.2.11

A traceability test is a record-based trace of a batch sold / ready for sale back to its related purchase(s). The traceability test shall test that these records are available and link the batch through each step where it is handled, including handling at any subcontractors or off-site facilities.

An input-output reconciliation may be carried out between 2 time periods, in relation to one batch, or in relation to one batch within a defined time period. The purpose of the input-output reconciliation is to demonstrate that certified outputs are not greater than the inputs, except as related to added ingredients, and that where product is transformed the yield (conversion rate) is accurate and justifiable. In verifying justifiable yields it is recommended to cross check the product specification with the factory records and with yields reported at previous audits.

Wherever possible, it is recommended that samples for record checks are selected from product the auditor views on-site, and physical product identification and quantities can then be cross-checked with traceability and volume records. It is recommended to look at traceability records and input-output reconciliation records in situ, i.e., on the factory floor, wherever possible.

In selecting the sample size, an example of different processes would be a primary processor that is filleting both pollock and salmon in different workshops. In this case, a traceability test and input-output reconciliation would typically be carried out for both a salmon and whitefish product.

The time limit set by the auditor for records may for example be aligned with the client's product recall timeframe. The time to produce input-output reconciliation documents may require longer but would still need to be

obtained and reviewed whilst on-site. The auditor can alert the client to the expected time limits for gathering records at the time of sending the audit plan.

- 8.2.12 At an unannounced audit, records for the traceability test and input-output reconciliation shall be verified on-site, but other management system records may be requested after the audit.

**Guidance 8.2.12**

This is intended to address situations where management personnel are not present and so certain records (e.g., contracts with subcontractors, licensing agreement, etc.) cannot be obtained. It is important that records relating to traceability, identification and input-output reconciliation are verified on-site, as this is where an unannounced audit may better identify product integrity risks.

- 8.2.13 At the MSC's written request, the auditor shall also verify records available at the audit with information that was supplied by the client to the MSC previously.

**Guidance 8.2.13**

This could be used to verify that information provided to the MSC for the purposes of tracebacks or supply chain reconciliations is consistent with records checked during the audit.

**Verifying use of the ecolabel, logo or other trademarks**

- 8.2.14 If the client uses the ecolabel, logo or other trademarks on their own products or for a customer, the auditor shall verify that the client is permitted to use the trademarks by confirming that:

- 8.2.14.1 The client can show a license agreement with MSCI signed by both parties; and/or
- 8.2.14.2 The client can show proof of product approval from MSCI for packaging designs for a sample of products.

**Guidance 8.2.14.2**

In the absence of proof, the auditor may contact MSCI via [ecolabel@msc.org](mailto:ecolabel@msc.org) for information.

- 8.2.15 Where the client includes non-certified seafood ingredients in products sold as certified, the auditor shall verify the client's calculation for all or a sample of products to which this applies, as specified in the [MSCI Certified Ingredient Percentage Rules](#).

**Guidance 8.2.15**

This document can be found on the [MSC website](#) and contains information on how to calculate the percentage of non-certified ingredients allowed in a product with the ecolabel or logo. This information was previously included in Annex BD5 of the CR v1.4.

## Closing meeting

- 8.2.16 Auditors shall conduct a closing meeting at the conclusion of each audit with the client's representative(s) to verify that the client understands:
- 8.2.16.1 That until its certification status and information, including scope of certification, is displayed on the [MSC website](#), the client is not certified and cannot make any claims concerning certification;
  - 8.2.16.2 Any actions the client may have to complete and their timeframes before certification can be awarded;
  - 8.2.16.3 Any findings or non-conformities that have been identified during the audit and their likely categorisation (subject to approval by the CAB's decision-making entity), timeframes to address these findings and the process for verifying their completion;
  - 8.2.16.4 That the client must inform the CAB of any significant future changes that affect certification, as specified in the contract;
  - 8.2.16.5 That the scope, subcontractor and supplier list is correct and agreed;
  - 8.2.16.6 The reporting timeframes for changes as detailed in the [MSC CoC Standard](#).

### Guidance 8.2.16

Any diverging opinions regarding the audit findings and/or conclusions between the auditor and the auditee can be discussed and if possible resolved at this stage. If not resolved it is recommended to record all opinions in the audit checklist.

## 8.3 Evaluation for CFO audits

### Opening meeting, gathering information and procedures

- 8.3.1 All audits shall begin with an opening meeting, at which auditors shall confirm with the client as a minimum:
- 8.3.1.1 Continued eligibility for CoC certification as per clause [6.2.9](#);
  - 8.3.1.2 Continued eligibility for certification against the [CFO CoC Standard](#) as per clause [6.2.3](#);
  - 8.3.1.3 Participant introductions and roles;
  - 8.3.1.4 The purpose of the audit;
  - 8.3.1.5 The audit plan, including how the audit activities will be undertaken and any visits to sites and/or subcontractors;
  - 8.3.1.6 The access required and the type of information needed at central office and site level, where applicable;
  - 8.3.1.7 Confidentiality of the information shared during the audit;
  - 8.3.1.8 The proposed scope of certification;
  - 8.3.1.9 The list of certified suppliers;



- 8.3.1.10 The list of any subcontractors that are or will be handling certified products and which ones are independently certified;
  - 8.3.1.11 The accuracy of information provided during the audit planning stage to complete [Table 6](#) (Risk Assessment Scoring for CFOs).
  - 8.3.2 For each of the activities listed in the proposed scope, the CAB shall collect and review evidence that the client's management system and procedures as recorded and implemented, meet the requirements of the [CFO CoC Standard](#).
  - 8.3.3 For clients with multiple sites, the auditor shall cross-check evidence seen at the central office with procedures and activities observed at consumer-facing and operations sites.
  - 8.3.4 During the audit, auditors shall review records relating to the receipt, sale and any applicable physical handling of the products listed in the proposed scope.
    - 8.3.4.1 The auditor should set a time limit for when these records are expected during the audit and raise a non-conformity if this is not met.
  - 8.3.5 At the MSC's written request, the auditor shall also verify records available at the audit with information that was supplied by the client to MSC previously.
- Guidance 8.3.5**

This could be used to verify that information provided to MSC for the purposes of tracebacks or supply chain reconciliations is consistent with records checked during audit.
- 8.3.6 If subcontractors are used, auditors shall verify that appropriate systems are in place to ensure identification of certified products at point of dispatch and receipt.
  - 8.3.7 Auditors shall establish that appropriate measures are taken by the client to segregate, identify, and prevent mixing between:
    - 8.3.7.1 Certified and non-certified seafood; and
    - 8.3.7.2 Where relevant, between seafood certified to other recognised certification schemes sharing MSC CoC.

## Interviews

- 8.3.8 Auditors shall interview responsible personnel to verify their competency in understanding and applying the [CFO CoC Standard](#):
  - 8.3.8.1 Auditors shall interview at least one individual per site visited and shall record their name or role and an assessment of their level of competency in the audit checklist.
    - a. Additional interviews should be carried out as necessary based on the size of the organisation, the complexity of operations and the range of staff who could affect the integrity of certified products.
  - 8.3.8.2 Interviews shall be used to determine if personnel understand the relevant process or procedure which ensures conformity with the CoC Standard.
  - 8.3.8.3 Interview questions shall not be leading.

### Guidance 8.3.8.3

Refer to ISO 19011 for guidance on interviewing. Interviews will include (but are not limited to) management staff and employees who are



responsible for buying and selling certified products, conducting goods-in checks at point of receipt, applying product identification or labels, selecting certified products for cooking, and managing traceability records.

## Verifying traceability

8.3.9 During the audit, auditors shall carry out traceability tests on products that are identified or labelled as certified to verify these products are traceable back to a certified source.

8.3.9.1 At consumer-facing sites, the traceability test shall verify that any products sold or labelled as certified at the time of the audit can be traced back to either a certified delivery or purchase.

8.3.9.2 For single-site CFO clients, the traceability test shall verify that any products sold or labelled as certified can be traced back to a certified purchase.

### Guidance 8.3.9.1 and 8.3.9.2

At a single site CFO client, the traceability test at site level will need to trace products from the point of selling / serving back to purchase from a certified source (e.g., supplier invoice / delivery note). However, at a consumer-facing site that is part of a larger organisation, the site may only be able to demonstrate traceability back to a delivery received from a central operations site. In this case, the remainder of the traceability test (back to point of purchase) must be completed from the central operations site or central office.

At a consumer-facing site, it may be possible to determine how the product can be linked to a certified delivery by interviewing the responsible person. The staff might explain how they selected the product that day, for example using a first-in-first-out policy, which allows the delivery to be confirmed as coming from a certified receipt note. If no certified product is on-site during the audit, the auditor can run a traceability test on a product similar to the certified products in the client's scope.

8.3.10 Where the organisation includes operations sites, the auditor shall also trace certified products received at a consumer-facing site from the point of receipt back to the point of purchase, including any internal transfers, processing, transport, subcontractor or storage steps.

8.3.10.1 The auditor shall carry out at least one traceability test involving an operations site during each audit.

8.3.10.2 Additional traceability tests can be carried out based on the auditor's judgement.

8.3.11 The total number of traceability tests shall:

8.3.11.1 Be determined in accordance with the guidelines in [Table 8](#);

8.3.11.2 Be sufficient to verify the traceability systems are effective for all sites under the CFO certificate;

8.3.11.3 Ensure that a traceability test is always carried out back to point of purchase for any products selected for product sampling.

- 8.3.12 Auditors shall use the template in the CFO audit checklist to complete all information for the traceability test, and shall clearly detail how the product can be linked across different traceability records.

#### Guidance 8.3.12

For example, if the client's traceability system uses unique lot codes to trace products back from receipt at a kitchen site to the central processing facility, this system and the specific lot codes would need to be included in the traceability test description.

### Product sampling

- 8.3.13 Where a client has been determined to be Standard Risk according to [Table 7](#), the auditor shall also collect product samples during surveillance and recertification audits.<sup>2</sup>

- 8.3.14 The auditor shall:

- 8.3.14.1 Use [Table 8](#) to determine whether product samples are to be collected at each consumer-facing site.
- 8.3.14.2 Follow the [MSC Seafood Sampling Procedure](#) to determine which species to select for sampling and how to collect the samples.
  - a. If no Priority or Optional Species are available at any sites visited, the auditor does not need to collect seafood samples but shall record the justification in the CoC audit checklist.
- 8.3.14.3 For each sample collected, make sure a traceability test has been completed as per [8.3.11.3](#) and all product details are recorded in the CoC audit checklist.

#### Guidance 8.3.14.3

The reason for having a traceability test back to suppliers conducted in combination with product sampling is to make sure that the MSC has full information on the product or batch in the event that a product authentication test indicates mislabelling and a full supply chain traceback will need to be carried out by the MSC.

### Verifying use of the ecolabel, logo and other trademarks

- 8.3.15 If the client uses the ecolabel, logo or other trademarks, the auditor shall verify that the client is permitted to use trademarks by confirming that:
- 8.3.15.1 The client can show a valid license agreement with MSCl signed by both parties; and/or
  - 8.3.15.2 The client can show proof of product approval from MSCl for packaging designs for a sample of products, if using the trademarks on packaging or menus.

<sup>2</sup> For clients already certified to the MSC CoC standard as of 20 February 2015, who intend to transition to the CFO CoC standard, this clause will become effective at their second audit against the CFO standard (whether recertification or surveillance). For new applicants looking to be certified against the CFO CoC standard after the 20<sup>th</sup> February 2015, this clause becomes effective at their first surveillance audit

#### **Guidance 8.3.15.2**

In the absence of proof, the auditor may contact MSCI via [ecolabel@msc.org](mailto:ecolabel@msc.org) for information.

- 8.3.16 Where the client has used non-certified seafood ingredients in a product, the auditor shall verify the client's calculation for all or a sample of products to which this applies, as specified in the [MSCI's Certified Ingredient Percentage Rules](#).

#### **Guidance 8.3.16**

This document can be found on the MSC website and contains information on how to calculate the percentage of non-certified ingredients allowed in a product with the ecolabel or logo. This information was previously included in Annex BD5 of the CR v1.4.

### **Closing meeting**

- 8.3.17 Auditors shall conduct a closing meeting at the conclusion of each audit with the client's representative(s) to verify that the client understands:
- 8.3.17.1 That until its certification status and information, including scope of certification, is displayed on the MSC website, the client is not certified and cannot make any claims concerning certification.
  - 8.3.17.2 Any actions that the client may have to complete and their timeframes before certification can be awarded.
  - 8.3.17.3 Any findings or non-conformities that have been identified during the audit and their likely categorisation (subject to approval by the CAB's decision-making entity), timeframes to address these findings and the process for verifying their completion.

#### **Guidance 8.3.17.3**

Major non-conformities raised at surveillance and recertification audits result in a follow-up visit within 90 days of the audit at which they were raised, as determined by [9.3.2](#).

- 8.3.17.4 That the client must inform the CAB of any significant future changes that affect the certification, as specified in the contract.
- 8.3.17.5 That the scope, subcontractor and supplier list is correct and agreed.
- 8.3.17.6 The reporting timeframes for changes as detailed in section 5.3 of the [CFO CoC Standard](#).

#### **Guidance 8.3.17**

The auditor may allow other personnel to witness the site visits. Any diverging opinions regarding the audit findings and/or conclusions between the auditor and the auditee can be discussed and if possible resolved at this stage. If not resolved it is recommended to record all opinions in the audit checklist.

## 8.4 Evaluation of subcontractors

### Guidance 8.4

This section sets out information on how to audit subcontractors used by all CoC clients.

- 8.4.1 The CAB shall require the client to provide details of how the client will retain full control of each subcontractor.
- 8.4.2 Non-certified contract processors or repackers shall be visited on-site prior to being used by the client for certified product, and thereafter at least annually.
- 8.4.3 During the on-site visit the auditor shall:
  - 8.4.3.1 Verify that Principles 2, 3, and 4 in the [CoC Standard](#) have been met, covering traceability, identification and segregation;
  - 8.4.3.2 Carry out an on-site traceability test and input-output reconciliation;
  - 8.4.3.3 If the subcontractor is already handling product for the client, cross-check a sample of dispatch and receipt records, product details and volumes from the client and subcontractor;
  - 8.4.3.4 Verify the agreement between client and subcontractor meets clause 5.3.1 in the [Default/ Group CoC Standards](#).
- 8.4.4 The auditor shall visit non-certified storage subcontractors at least once during their client's 3-year certificate validity if the subcontractor is:
  - 8.4.4.1 Located in a country with a Transparency International CPI score below 41 (<http://cpi.transparency.org>); and
  - 8.4.4.2 Handling product that is part-processed by the client, but not yet in the form in which it will be sold by the client.

### Guidance 8.4.2

CFO clients are only eligible to use contract processors that are independently certified, as per the [CFO CoC Standard](#) clause 5.4.3.

- 8.4.5 During this visit the auditor shall verify that a sample of certified products can be identified as certified.
- 8.4.6 In addition to requirements [8.4.2](#) and [8.4.4](#), the auditor should visit non-certified subcontractors, excluding transport subcontractors, when there is any concern relating to product integrity.

### Guidance 8.4.6

The auditor may perform other checks, such as cross-checking records from the certificate holder and subcontractor, reviewing dispatch and receipt records, or carrying out an input-output reconciliation of certified product handled by the subcontractor.

CABs may conduct just one visit to a subcontractor used by more than one of their clients, but will still need to cross check the records relating to each client and raise non-conformities with each client where appropriate. A CAB will still need to visit a subcontractor used by their client even if the subcontractor was recently visited by another CAB.

## 9 Audit Findings

### 9.1 Audit findings at all CoC audits

- 9.1.1 Auditors shall recommend a CAB to suspend a client where they find reason to do so in accordance with [GCR 7.4](#).
- 9.1.2 The CAB shall send the CoC audit checklist with all audit findings to the client within 10 days of the audit.

### 9.2 Audit findings at single, multi-site and CFO audits

#### Guidance 9.2

Audit findings for group CoC audits are covered in [section 9.4](#).

- 9.2.1 Auditors shall classify non-conformities as minor or major as follows:
  - 9.2.1.1 Minor non-conformity: where the client does not comply with the [MSC CoC Standard](#), but those issues do not jeopardise the integrity of the CoC.
  - 9.2.1.2 Major non-conformity: where the integrity of the CoC is jeopardised and certification cannot be granted or maintained.
- 9.2.2 For clients certified against the [CFO CoC standard](#), an incident of selling or identifying non-certified product as certified or with the trademarks at the point of sale or serving to the final consumer shall be considered:
  - 9.2.2.1 As a major non-conformity only if the auditor determines that the cause of the mislabelling was due to an individual not following established internal procedures.
  - 9.2.2.2 As a cause for suspension under [GCR 7.4](#) in all other cases.

#### Guidance 9.2.2

Under the [GCR 7.4.9.2](#), selling non-certified product as certified is a cause for suspension. For CFO clients, however, [clause 9.2.2.1](#) refers specifically to incidents where adequate procedures are in place to ensure compliance with the CoC Standard, but employees at site level make a mistake, for example in setting out labels on a fresh fish counter or at a catering site. Any other case of mislabelling non-certified product as certified will be a cause for suspension under [GCR 7.4](#); for example, mislabelling due to a failure in the client's management, traceability or identification systems (or before the point of final sale/serving to consumers).

- 9.2.3 For CFO clients, the auditors shall raise all non-conformities only against the central office, even if detected at site level.
  - 9.2.3.1 The site name, address and date of detection shall be recorded in the CoC audit checklist.

#### **Guidance 9.2.3.1**

The process for CFO clients is distinct from Group CoC, where non-conformities detected at site level are raised against both the site and the group.

For multi-site CoC clients, non-conformities found at different sites are all raised against the certified entity (the organisation which holds the CoC certificate).

- 9.2.4 The CAB may close out or downgrade non-conformities found during the audit.
  - 9.2.4.1 Where the CAB's decision-making entity disagrees with auditor classification of non-conformities the CAB shall record the rationale for those changes in the checklist.
- 9.2.5 The CAB shall raise any non-conformities found at a non-certified subcontractor with the client.

#### **Guidance 9.2.5**

If the CAB identifies a non-conformity relating to a subcontractor certified by a different CAB, the CAB is encouraged to notify MSC. The MSC will then inform the relevant CAB.

### **Minor non-conformities**

- 9.2.6 For minor non-conformities raised during initial certification, the CAB shall not grant certification until the applicant has submitted an effective action plan to address all minor non-conformities.
- 9.2.7 The action plan shall include a description of:
  - 9.2.7.1 The corrective actions intended to address the non-conformity; and
  - 9.2.7.2 An appropriate timeframe to implement corrective action.
- 9.2.8 The CAB shall require that minor non-conformities raised during surveillance audits are satisfactorily addressed no later than the next scheduled audit.

### **Major non-conformities**

- 9.2.9 The CAB shall require that major non-conformities are closed or downgraded according to the timeframes below.
  - 9.2.9.1 Major non-conformities raised during initial certification shall be closed or downgraded before the CAB can grant certification.
    - a. If within 90 days of the date of the initial audit, the CAB cannot close or downgrade the major non-conformity, a full re-audit shall be required.
  - 9.2.9.2 Major non-conformities raised during surveillance audits (or any other time after initial certification) shall be closed or downgraded within 30 days of detection.
    - a. If the major non-conformity is not addressed within the 30 day maximum timeframe, suspension or withdrawal of the certificate and a full re-audit may be initiated.
- 9.2.10 The CAB shall inform the client that an effective action plan is required in order to close or downgrade major non-conformities.
  - 9.2.10.1 The action plan submitted by the client shall include a description of:

- a. The root cause of the non-conformity;
- b. The corrective actions intended to satisfactorily address the non-conformity; and
- c. An appropriate timeframe to implement corrective action.

### 9.3 Additional requirements for major non-conformities at CFO audits

- 9.3.1 For CFO clients with multiple sites, where the number of sites with major non-conformities detected at surveillance or recertification audits equals or exceeds the reject numbers in [Table 10](#), the CAB shall suspend the certificate as per [GCR 7.4](#).

**Table 10: Reject number of sites following major non-conformities**

Number of sites visited by the CAB during audit	Reject Number (number of sites with at least one major non-conformity detected during audit)
2 – 5	2
6-10	3
11-15	4
16-20	5
21-25	6
26-30	7
31-40	8
41-50	10
51-60	12
61-70	14
71-80	16
80+	19

#### Guidance 9.3.1

The reject number ([Table 10](#)) applies only for surveillance or recertification audits. The reject number is the total number of sites where at least one major non-conformity was detected. The first column in the table refers to all sites visited (including the central office and all operations and consumer-facing sites).

If 3 sites were visited, and one major non-conformity was detected at the first site, 2 major non-conformities at the second and only a minor non-conformity at the third site, the reject number would be 2 and the certificate would be suspended.



- 9.3.2 For CFO clients, where major non-conformities are detected at a surveillance or recertification audit, and the certificate is not suspended, the CAB shall carry out follow-up site visits within 90 days of the original audit:
- 9.3.2.1 Site visits should include at a minimum a review of the non-conformity, a traceability test and personnel interviews, but do not need to cover the full [CFO CoC Standard](#).
  - 9.3.2.2 The sites to be visited shall include at least each site where a major non-conformity was detected, plus:
    - a. For clients with 6 or more sites, one additional site should be visited.
    - b. More sites may be visited where the CAB deems it necessary.
  - 9.3.2.3 Where an additional major non-conformity is raised against the same clause in the [CFO CoC Standard](#) during the follow-up visits, the CAB shall suspend the certificate and follow requirements in [GCR 7.4](#).
  - 9.3.2.4 Where a major non-conformity is raised against a different clause, or clauses, during the follow-up visits, the CAB shall follow the procedures in [9.3.2](#).

#### **Guidance 9.3.2.4**

The aim of the follow-up visits is to help the auditor verify whether the major non-conformity was a one-off issue or could indicate a problem with the CFO's central management system (i.e., employee training, site-level procedures, etc.).

## **9.4 Audit findings at Group CoC audits**

### **Grading of non-conformities found on sites by the CAB auditor**

- 9.4.1 The CAB shall classify non-conformities detected during site audits into one of the following 3 categories:
- 9.4.1.1 Site critical – where a product is found which is labelled or has been sold as certified but is shown not to be certified.
  - 9.4.1.2 Site major – where there is a system breakdown that could result in non-certified products being sold as certified.
  - 9.4.1.3 Site minor – where there is a system breakdown that is unlikely to result in non-certified product being sold as certified.
- 9.4.2 Where major and minor non-conformities are identified by CABs during site audits, the CAB shall raise a further non-conformity (with the same grading) against the management system of the central office.
- 9.4.3 The CAB shall determine whether the number of sites with major non-conformities exceeds the limit in [Table 11](#), and if so raise a group critical non-conformity as per clause [9.4.7.1.b](#).



Table 11: Reject number of sites – Group CoC

Number of sites sampled by the CAB	Reject Number (number of sites with at least one major non-conformity detected during audit)
1 – 3	2
4-10	3
11-15	4
16-20	5
21-25	6
26-30	7
31-40	8
41-50	10
51-60	12
61-70	14
71-80	16
80+	19

**Source:** Adapted from ISO 2859

- 9.4.3.1 Where a stratified sample is audited (i.e., 2 or more sub-groups are sampled):
- The number of sites with major non-conformities from each sub-group shall be added together; and
  - The number of sites sampled from each subgroup shall be added together; and
  - The total number of sites with major non-conformities and the total number of sites sampled shall be used to determine 9.4.3.

#### **Guidance 9.4.3.1**

The CAB may raise non-conformities over contractual matters but these are not covered in these requirements.

### **Critical non- conformities**

- 9.4.4 If critical non-conformities are identified by CABs during site audits, the CAB shall determine if the non-conformity is either:
- 9.4.4.1 A site-specific non-conformity, which is limited to the specific site impacted and does not indicate a failure of the group's management or control systems; or
  - 9.4.4.2 A systemic non-conformity, which indicates a possible or likely failure of group-level control or verification systems, and/or has the potential to impact more than one site.
- 9.4.5 If the critical non-conformity is determined to be systemic, the CAB shall raise a critical non-conformity against the group's central office.

9.4.6 If the critical non-conformity is determined to be site-specific, the CAB shall raise a major non-conformity against the group's central office.

9.4.6.1 If site-specific critical non-conformities are detected at 2 or more sites during an audit, the CAB shall:

- a. For a stratified group, in addition to 9.4.6 above, suspend all sites in the stratum/sub-group where non-conformities are detected.

#### Guidance 9.4.6.1

For a stratified group, if site-specific critical non-conformities are found at 2 or more different sites within the same subgroup during an audit, the group is not automatically suspended – only the sites within the subgroup are suspended and a major non-conformity is raised against the central office's management system. This allows stratified groups to mitigate against the risk of a full group suspension if non-conformities are limited to only a specific subgroup.

- b. For a non-stratified group, raise a group critical non-conformity.

### Grading of non-conformities found against the group's central office

9.4.7 The CAB shall classify non-conformities raised against the organisation's central office into one of 3 categories.

9.4.7.1 Group critical – where:

- a. There is a complete breakdown of the management system such that the organisation's assurances of site conformity with the [Group CoC Standard](#) cannot reasonably be relied upon; or
- b. The number of sites where one or more site major non-conformities are raised meets or exceeds the reject number shown in [Table 11](#); or
- c. Site critical non-conformities have also been raised against the central office as per [9.4.5](#) or [9.4.6.1.ii](#).

9.4.7.2 Group major – where there is a breakdown of activities related to one element of the organisation's internal management or auditing system.

9.4.7.3 Group minor – where there is a partial lapse or partial breakdown of activities related to one element of the organisation's management or auditing system.

9.4.8 Where more than 4 group major non-conformities are raised during any one audit, a group critical non-conformity shall be raised.

### Actions following non-conformities

9.4.9 For initial certification, the CAB shall not grant certification until all major and minor non-conformities are closed out, as per [9.2.6](#) and [9.2.9.1](#).

### Actions following site non-conformities

9.4.10 The CAB shall verify that the group has taken actions on non-conformities raised on individual sites according to their severity:

- 9.4.10.1 Site critical non-conformities shall result in the organisation immediately suspending the site from the group until the non-conformity has been fully addressed.

- 9.4.10.2 Site major non-conformities shall be corrected within 30 days of their identification.
  - a. If not corrected within this time frame, the site shall be immediately suspended from the group.
- 9.4.10.3 Site minor non-conformities shall be corrected within 12 months of their identification.
  - a. If not corrected within this time frame, the non-conformity shall be immediately re-graded as site major, and there shall be 30 days given to correct it.
- 9.4.11 The CAB may adjust the timeframes for the site to address non-conformities if the site is not handling certified product during this timeframe.

#### Actions following central office non-conformities

- 9.4.12 The CAB shall address non-conformities raised against the group's central office in the following manner according to their severity:
  - 9.4.12.1 Group critical non-conformities shall result in the immediate suspension of the group.
    - a. The CAB shall follow requirements set out in [GCR 7.4](#).
  - 9.4.12.2 Group major non-conformities shall be corrected within 30 days of their identification.
    - a. If not corrected within this timeframe, the group shall be immediately suspended.
  - 9.4.12.3 Group minor non-conformities shall be corrected within 90 days of their identification.
    - a. If not corrected within this timeframe, the non-conformity shall be re-graded as a major against the central office, and there shall be 30 days given to correct it.

## 10 Additional Certification Requirements For Group CoC

### Guidance 10

This section covers additional requirements that only apply for Group CoC clients, such as stratification of the group and determining the sample size of sites to be audited.

### 10.1 CAB eligibility to perform group certification

- 10.1.1 Prior to accepting an application for group certification, the CAB's documented procedures for conducting group certification shall have been assessed by the accreditation body during a desk review or an on-site audit.
- 10.1.2 The CAB shall conform to any conditions the accreditation body may have imposed on the CAB's audit of group certification schemes, which may include without limitation a:
  -

- 10.1.2.1 Requirement for the accreditation body to witness the first group audit undertaken;
- 10.1.2.2 Requirement for the accreditation body to review the CAB's audit records of the first group certification undertaken;
- 10.1.2.3 Limit on the number of group certifications that may be undertaken;
- 10.1.2.4 Limit on the number of sites permitted within a group scheme for that CAB.

## **10.2 Scope of audits**

- 10.2.1 All activities covered by the scope of the certificate shall be covered in the scope of the CAB's site audits.
- 10.2.2 The CAB shall audit the central office and a sample of sites, as dictated by sections [10.3](#) and [10.4](#).

## **10.3 Sample stratification**

### **Decision if sample stratification is needed**

- 10.3.1 The CAB shall review the group's proposed scope and sites to make a decision on whether sample stratification is required.
  - 10.3.1.1 Stratification shall take place where the group's sites can be classified into distinct sub-groups according to activities shown in [Table 5](#).
  - 10.3.1.2 Stratification shall take place where manufacturing and/or processing activities occur within a group but where not all sites perform these activities.
- 10.3.2 If stratification is required, the CAB shall follow the sampling procedure for each sub-group independently.
- 10.3.3 The CAB shall keep a record of the sample stratification process and rationale in the CoC audit checklist.

## **10.4 CAB decides sample plan to be used**

- 10.4.1 The CAB shall complete a risk assessment using [Table 12](#).
  - 10.4.1.1 The CAB shall allocate one score for each risk factor.
  - 10.4.1.2 If it appears there are 2 scores within the same sub-group, the CAB shall allocate the higher score.
- 10.4.2 The CAB shall allocate the applicant group or sub-group to a sample table following [Table 13](#).

Table 12: Sample plan allocation

		Risk factor	Score	Score given
1	<b>Activity (refer to Table 5 Activity Scope Definitions)</b>			
	a.	Trading fish (buying and selling) (Activity 1)	4	
	b.	Transportation (Activity 2)	4	
	c.	Storage (Activity 3)	4	
	d.	Wholesale and/or distribution of whole fresh fish in unsealed containers (Activities 4,5)	8	
	e.	Wholesale and/or distribution of repacked products (Activities 4,5)	4	
	f.	Harvest (Activity 6)	8	
	g.	Packing or repacking (Activity 7)	15	
	h.	Processing, contract processing, or use of contract processors (Activities 8, 9, 10)	20	
	i.	Retail / food service direct to consumers (Activities 11, 12)	4	
	j.	Aquaculture (Activity 14)	8	
2	<b>Ownership</b>			
	a.	No common ownership of sites and central office	12	
	b.	Sites are franchisees of the central office	8	
	c.	Sites are owned by the central office	3	
3	<b>Accredited certifications held</b>			
	a.	None	8	
	b.	HACCP / ISO 9001 / ISO 22000 / GFSI-recognised standard	2	
4	<b>Similar species handled at the same time in the same place</b>			
	a.	High - Certified and non-certified similar looking species on site at the same time	12	
	b.	Medium – Certified and non-certified species handled at the same time but look differently (e.g., white and pink flesh)	6	
	c.	Low – Only certified species are handled	3	
5	<b>Number of staff at largest site making ecolabel or logo application decisions.</b> This means physically selecting a label, bag and carton or similar bearing the ecolabel or logo from amongst other labels or packaging materials. If labelling or packaging decisions are made by a supervisor or manager, the number of staff shall refer to the number of supervisor or manager-level staff involved.			
	a.	More than 11 employees	8	
	b.	Between 3-10 employees	4	
	c.	Fewer than 2 employees	2	
	d.	No labels or trademarks are placed on products	0	

6	<b>Country of operation score on Transparency International's latest corruption perception index (for latest scores see <a href="http://cpi.transparency.org">http://cpi.transparency.org</a>). Please refer to the latest year's CPI Score</b>		
	a.	Under 32	28
	b.	Between 32 and 62 inclusive	16
	c.	Above 62	4
7	<b>Seafood Purchasing</b>		
	a.	Purchasing from suppliers is managed by a combination of the central office and each site (central and local purchasing)	12
	b.	Purchasing from suppliers is managed by each site (local purchasing)	9
	c.	Purchasing from suppliers is managed by the central office (central buying list or a centrally approved list of products and suppliers for sites to use)	3
	<b>Total score</b>		
	<b><i>GUIDANCE:</i> Possible scores range from 21 to 100</b>		

Table 13: Allocation to sample table

Score from Table 12	Sample Table
80 or more	100% of sites audited
55 to 80	Sample Table 15
40 to 60	Sample Table 16
30 – 45	Sample Table 17
Under 35	Sample Table 18

**Guidance Table 13**

The ranges in Table 13 intentionally overlap. Where this occurs (for example, a score of 30-35) CABs can make the decision on which table to use and record this decision in the checklist.

## 10.5 Site sample plan

- 10.5.1 The CAB shall perform the initial audit following the initial audit-sampling plan within the sample table selected (Tables 15 to 18).
- 10.5.2 Following an audit the CAB shall decide whether sampling sizes for the next surveillance audit should be increased or decreased from the current sampling plan.
- 10.5.2.1 The CAB shall increase the sampling plan for the next surveillance audit by one level according to Table 13 if the group meets at least one of the criteria below:

- a. One critical non-conformity was raised against a site or more than 3 major non-conformities were raised against the central office at the last audit conducted by the CAB;
  - b. Internal audits or internal control system not operational and corrective or preventive actions are inappropriate; or
  - c. The group's CoC certificate was suspended or withdrawn in the last 12 months.
- 10.5.2.2 Where the group is already in the High Risk Sample Plan and meets at least one of the criteria in 10.5.2.1, the sample size shall be multiplied by 1.5 and rounded up for the next surveillance audit.
- 10.5.2.3 If the group does not meet any of the criteria in 10.5.2.1, and meets at least one of the criteria below, the CAB may decrease by one level the sampling plan from Table 13 for the next surveillance audit:
  - a. No major or critical non-conformities with the Group CoC Standard demonstrated at the last CAB audit of the central office and sample of sites.
  - b. Internal audits or internal control system are operating well, identifying issues and applying appropriate corrective and preventive action.
- 10.5.2.4 Where the group is already in the Very Low Risk sample plan and meets at least one of the criteria in 10.5.2.3, the sample size may be multiplied by 0.5 and rounded up for the next surveillance audit.
- 10.5.3 The sampling plan shall not be reduced by more than one level during the lifetime of a certificate.

## 10.6 Sample selection

- 10.6.1 The CAB shall select the sample of sites to be audited following the hierarchy set out in Table 14.
  - 10.6.1.1 The CAB shall select sites from criterion 1 before criterion 2, from criterion 2 before criterion 3 and so on.
- 10.6.2 The CAB shall not inform the client of the sample of sites selected until as close to the audit date as practicable, and in all cases not more than 20 days prior to the proposed audit date.

**Table 14: Sample selection hierarchy**

Sample Selection Hierarchy	
Criterion 1	Site determined for sample by MSC or accreditation body
Criterion 2	Site is part of any kind of internal or external investigation
Criterion 3	Logistical considerations: combination of trips, availability of auditors
Criterion 4	Where the sampling table dictates that 4 or more sites shall be audited, a minimum of 25% of the samples rounded up to the nearest whole number shall be selected at random.

**Note:** Criterion 3 refers to sites that may be geographically close to sites selected under Criteria 1 and 2 or geographically close to sites of other clients of the CAB.

## 10.7 Adding new sites to the group

### Approval of sites with new activities or where new sites total more than 10% of previous number

- 10.7.1 The CAB shall inform the client that CAB approval is required prior to adding:
  - 10.7.1.1 New sites totalling more than 10% of the number of sites included in the certificate at the most recent audit; or
  - 10.7.1.2 Sites with new activities to the group not already covered in the group's CoC scope.
- 10.7.2 The CAB shall approve the proposed new sites providing:
  - 10.7.2.1 There is objective evidence (such as an internal audit report) that the new sites comply with relevant sections of the [Group CoC Standard](#);
  - 10.7.2.2 Details required for the site register have been provided; and
  - 10.7.2.3 The CAB is confident that the central office has the required resources to manage the increased workload.
- 10.7.3 If any of the elements in [10.7.2](#) are not met, the CAB shall not add the new sites to the group until the central office has satisfactorily demonstrated how it will address the requirement(s) of concern.
- 10.7.4 If the CAB requires an audit to be performed, the sample table and plan currently used for the group shall be used to determine the number of new sites to be audited, unless the CAB justifies why a different sample size is appropriate.
- 10.7.5 The central office shall also be audited to address [10.7.2.3](#) if the CAB is not confident that the group has the required resources to manage the increased workload.

### Approval of new sites totalling equal or less than 10% of the previous number

- 10.7.6 The CAB shall require the group to notify it in writing of the addition of up to 10% of the number of sites present at the most recent audit.
  - 10.7.6.1 The CAB shall verify that the new sites do not add new activities to the scope of the certificate.
    - a. If new activities are added, the CAB may conduct an audit of the new activities if deemed necessary, following requirements in [10.7.4](#).
- 10.7.7 The CAB may at its discretion require additional audit work to be undertaken.



Table 15: Sample plan for Group CoC – High Risk

Initial Audit		Annual Audit	
Number of sites	Normal	Number of sites	Normal
1 to 2	All	1 to 2	All
3 to 4	2	3 to 4	2
5 to 9	3	5 to 9	2
10 to 16	4	10 to 16	3
17 to 25	5	17 to 25	3
26 to 36	6	26 to 36	4
37 to 49	7	37 to 49	5
50 to 64	8	50 to 64	5
65 to 84	9	65 to 84	6
85 to 100	10	82 to 100	6
101 to 121	11	101 to 121	7
122 to 144	12	122 to 144	8
145 to 169	13	145 to 169	8
170 to 196	14	170 to 196	9
197 to 225	15	197 to 225	9
226 to 256	16	226 to 256	10
257 to 289	17	257 to 289	11
290 to 324	18	290 to 324	11
325 to 361	19	325 to 361	12
362 to 400	20	362 to 400	12
401 to 441	21	400 to 441	13
442 to 484	22	442 to 484	14
485 to 529	23	485 to 529	14
530 to 576	24	530 to 576	15
577 to 625	25	577 to 625	15
626 to 676	26	626 to 676	16
677 to 729	27	677 to 729	17
730 to 784	28	730 to 784	17
785 to 841	29	785 to 841	18
842 to 900	30	842 to 900	18
901 to 961	31	901 to 961	19
962 to 1024	32	962 to 1024	20
Over 1024	Square root rounded up	Over 1024	<u>Initial</u> sample multiplied by 0.6

Table 16: Sample Plan for Group CoC – Medium Risk

Initial Audit		Annual Audit	
Number of sites	Normal	Number of sites	Normal
1 to 2	All	1 to 2	All
3 to 4	2	3 to 4	2
5 to 9	3	5 to 9	2
10 to 16	3	10 to 16	2
17 to 25	4	17 to 25	2
26 to 36	5	26 to 36	3
37 to 49	5	37 to 49	3
50 to 64	6	50 to 64	3
65 to 84	7	65 to 84	3
85 to 100	7	82 to 100	3
101 to 121	8	101 to 121	4
122 to 144	9	122 to 144	4
145 to 169	10	145 to 169	5
170 to 196	10	170 to 196	5
197 to 225	11	197 to 225	5
226 to 256	12	226 to 256	6
257 to 289	12	257 to 289	6
290 to 324	13	290 to 324	6
325 to 361	14	325 to 361	6
362 to 400	14	362 to 400	6
401 to 441	15	400 to 441	7
442 to 484	16	442 to 484	7
485 to 529	17	485 to 529	8
530 to 576	17	530 to 576	8
577 to 625	18	577 to 625	8
626 to 676	19	626 to 676	8
677 to 729	19	677 to 729	8
730 to 784	20	730 to 784	9
785 to 841	21	785 to 841	9
842 to 900	21	842 to 900	9
901 to 961	22	901 to 961	10
962 to 1024	23	962 to 1024	10
Over 1025	(Square root x .7) rounded up	Over 1024	<u>Initial</u> Sample multiplied by 0.42

Table 17: Sample plan for Group CoC – Low Risk

Initial Audit		Annual Audit	
Number of sites	Normal	Number of sites	Normal
1 to 2	All	1 to 2	All
3 to 4	2	3 to 4	2
5 to 9	2	5 to 9	2
10 to 16	2	10 to 16	2
17 to 25	3	17 to 25	2
26 to 36	3	26 to 36	2
37 to 49	4	37 to 49	2
50 to 64	4	50 to 64	2
65 to 84	5	65 to 84	2
85 to 100	5	82 to 100	2
101 to 121	6	101 to 121	2
122 to 144	6	122 to 144	2
145 to 169	7	145 to 169	3
170 to 196	7	170 to 196	3
197 to 225	8	197 to 225	3
226 to 256	8	226 to 256	3
257 to 289	9	257 to 289	3
290 to 324	9	290 to 324	3
325 to 361	10	325 to 361	3
362 to 400	10	362 to 400	3
401 to 441	11	400 to 441	4
442 to 484	11	442 to 484	4
485 to 529	12	485 to 529	4
530 to 576	12	530 to 576	4
577 to 625	13	577 to 625	4
626 to 676	13	626 to 676	4
677 to 729	14	677 to 729	5
730 to 784	14	730 to 784	5
785 to 841	15	785 to 841	5
842 to 900	15	842 to 900	5
901 to 961	16	901 to 961	5
962 to 1024	16	962 to 1024	5
Over 1024	Square root multiplied by 0.5, rounded up	Over 1024	Initial sample multiplied by 0.3

**Sources:** ISO 2859, IAF Mandatory requirements for multi-site certification

Table 18: Sample Plan for Group CoC – Very Low Risk

Initial Audit		Annual Audit	
Number of sites	Normal	Number of sites	Normal
2	All	2	1
3 to 4	1	3 to 4	1
5 to 9	1	5 to 9	1
10 to 16	1	10 to 16	1
17 to 25	2	17 to 25	1
26 to 36	2	26 to 36	1
37 to 49	2	37 to 49	1
50 to 64	2	50 to 64	1
65 to 84	3	65 to 84	1
85 to 100	3	82 to 100	1
101 to 121	3	101 to 121	1
122 to 144	4	122 to 144	1
145 to 169	4	145 to 169	1
170 to 196	4	170 to 196	1
197 to 225	5	197 to 225	2
226 to 256	5	226 to 256	2
257 to 289	5	257 to 289	2
290 to 324	5	290 to 324	2
325 to 361	6	325 to 361	2
362 to 400	6	362 to 400	2
401 to 441	6	400 to 441	2
442 to 484	7	442 to 484	2
485 to 529	7	485 to 529	2
530 to 576	7	530 to 576	2
577 to 625	8	577 to 625	3
626 to 676	8	626 to 676	3
677 to 729	8	677 to 729	3
730 to 784	8	730 to 784	3
785 to 841	9	785 to 841	3
842 to 900	9	842 to 900	3
901 to 961	9	901 to 961	3
962 to 1024	9	962 to 1024	3
Over 1024	Square root multiplied by 0.3, rounded up	Over 1024	Initial sample multiplied by 0.3

**Sources:** ISO 2859, IAF Mandatory requirements for multi-site certification

## 11 Certificate Management For All CoC Clients

### Guidance 11

Requirements in this section are applicable to all CoC certificate holders.

### 11.1 Certification decision

#### Guidance 11.1

This section is applicable following all audits (initial, surveillance and recertification) except for clause 11.1.1, which only applies to certification decision after initial audits.

Minor and major non-conformities after surveillance and recertification audits must be addressed within the timeframes dictated by clauses 9.2.8 and 9.2.9.2.

- 11.1.1 The CAB may recommend an applicant for certification:
  - 11.1.1.1 If no non-conformities are observed at an audit; or
  - 11.1.1.2 When an action plan satisfactorily addresses all minor and major non-conformities
- 11.1.2 The CAB shall update the CoC audit checklist with details of activities undertaken by the client to accept the action plan and/or close out or downgrade major non-conformities.

#### Guidance 11.1.2

The finalised checklist that is uploaded onto the scheme database needs to detail the findings of the audit and include the CAB's decision on the outcome, independent of the individual auditor's.

- 11.1.3 The CAB's decision-making entity shall:
  - 11.1.3.1 Review and confirm the grading of any non-conformity found during the audit;
  - 11.1.3.2 Make a decision on whether the scope of the certificate should include all categories listed in the potential scope, based on the confidence the CAB has in the client's system; and
  - 11.1.3.3 Make a decision on certification and communicate this decision to the client within 30 days of the audit date, unless further evidence has been requested.
    - a. If further evidence has been requested from the client to demonstrate that non-conformities were satisfactorily closed, the CAB shall make a decision on certification within 30 days of receiving this evidence.
- 11.1.4 For Group CoC clients and CFO clients with multiple sites, in addition to the above, the CAB's decision-making entity shall not make a decision on certification or recertification until they are satisfied that:
  - 11.1.4.1 The sample table and sampling plan selected was appropriately selected for the client;

- 11.1.4.2 All requirements of the [Group or CFO CoC Standard](#) have been audited, either at that site or, if centrally managed, at the central office;
- 11.1.4.3 Evidence contained in audit reports demonstrates that the client is operating in a competent manner;
- 11.1.4.4 Sites are in conformity with requirements, and that any major non-conformities have been addressed within the allotted timeframes.

#### **Guidance 11.1.4.4**

The CAB's decision-making entity may seek and review relevant data not contained in reports, including, but not limited to, interviewing the client's personnel.

- 11.1.5 For all CoC clients, the CAB shall, within 10 days of the certification decision:

- 11.1.5.1 Submit the finalised CoC audit checklist to the client.
  - a. The CAB shall ensure that the client signs-off on the accuracy of specific sections of the CoC audit checklist, including:
    - i. The schedule of certified suppliers;
    - ii. Any statements made by the certificate holder indicating that the certificate holder was not handling any certified products at the time of the audit;
    - iii. Where collected, the complete list of the certificate holder's purchases of certified products or the list of certified batches processed since the previous audit.

#### **Guidance 11.1.5.1**

The client's sign-off can be electronic or provided, for example, via a record of email correspondence if a signature on the audit checklist is not practical.

- 11.1.5.2 Record the following details onto the scheme database:
  - a. The client's confirmed and/or updated scope;
  - b. List of subcontractors;
  - c. List of suppliers;
  - d. List of sites (where applicable);
  - e. The finalised CoC audit checklist;
  - f. Audit date;
  - g. The CoC certificate for initial certification and recertification audits.
- 11.1.5.3 Issue the certificate(s) to the client for certification or recertification audits.
  - a. For group and CFO CoC certificates, the CAB shall issue the certificate to the central office under the name of the group or organisation.
  - b. When a client's scope of certification includes products certified under other recognised certification schemes that share MSC CoC, the CAB shall issue a separate certificate for each scheme with the relevant scopes.
    - i. When one certificate is issued on a different date than the other, the second certificate shall be issued with the same expiration date as the first certificate.

#### **Guidance 11.1.5.3.b**

For a client handling both MSC- and ASC-certified products, separate certificates and certificate codes are issued for MSC and ASC, even though only one CoC audit and checklist are needed.

### **Interim certification**

- 11.1.6 The CAB shall inform the applicant that an interim certificate may be issued for up to 90 days, should the MSC approve the interim certification as per clause [6.2.4](#).
- 11.1.7 If after 90 days an on-site audit has not been completed and there has not been a CoC certificate issued, the CAB shall:
- 11.1.7.1 Cancel the certificate in the database;
  - 11.1.7.2 Inform the applicant that the interim certificate has expired;
  - 11.1.7.3 Inform the applicant that any use of the trademarks and/or claim of CoC certification shall cease immediately.

## **11.2 Changes to the certificate**

#### **Guidance 11.2**

Changes to a certificate may come about due to:

- New sites being added
- New subcontractors being used
- Scope extension for a new species
- Scope extension for a new activity
- Purchasing certified products from a new supplier
- Scope extension to handle products certified against recognised certification schemes that share MSC CoC

- 11.2.1 The CAB shall check continued eligibility against [6.2.9](#) where a change to the certificate adds a new entity.
- 11.2.2 The CAB shall inform the client that for any changes to scope, suppliers, subcontractors, product certified to another certification scheme or contact details the client should notify the CAB as detailed in the relevant CoC Standard.
- 11.2.3 In the event of the client adding a new subcontractor, the CAB shall visit the subcontractor if required according to [section 8.4](#).
- 11.2.4 The CAB shall use its own judgement to determine if further on-site visits are required when notified that the number of sites within a CFO certificate has increased by over 50%.
- 11.2.5 On receiving a request for an extension to scope that includes new activities, or the first scope extension to handle products certified to recognised certification schemes that share MSC CoC, the CAB shall:

- 11.2.5.1 Review available information;
  - 11.2.5.2 Consider if the client's existing management system is suitable for the proposed new scope of operations;
  - 11.2.5.3 Consider if eligibility for the respective version of the [MSC CoC Standard](#) will be maintained;
    - a. If a client is no longer eligible to be certified under the same version of the CoC Standard, the CAB shall inform the client they must be re-certified against the appropriate CoC Standard within 6 months.
  - 11.2.5.4 Consider if the client is no longer eligible for remote audits and determine whether future audits will need to be on-site;
  - 11.2.5.5 Decide whether an on-site audit is required before the scope can be extended and record the rationale for this decision.
  - 11.2.6 Upon approval of the first scope extension for the client to buy product certified against recognised certification schemes that share MSC CoC, the CAB will need to issue a certificate against this scheme and update information in the relevant scheme's database.
    - 11.2.6.1 The CAB shall not process an extension of scope to add products certified under another scheme into the client's CoC scope if the client has a valid CoC certificate issued by another CAB.
- Guidance 11.2.6.1**

Where an organisation is CoC-certified with MSC products in scope, they must use the same CAB to process a scope extension to handle products certified by ASC (or other schemes that also share MSC CoC). A client cannot have one CAB for their ASC scope and another CAB for their MSC scope.
- 11.2.7 The CAB shall update the scheme database within 10 days of a reported change to:
    - 11.2.7.1 Scope;
    - 11.2.7.2 Subcontractors;
    - 11.2.7.3 Suppliers;
    - 11.2.7.4 New contact person;
    - 11.2.7.5 Sites.
  - 11.2.8 Where relevant, the CAB should update and document the risk assessment and the sample table and plan for the client.

## 11.3 Surveillance frequency and additional audits

- 11.3.1 The CAB shall determine the surveillance frequency for certificate holders after each certification, surveillance and re-certification audit according to the following criteria:



- 11.3.1.1 A frequency of 18 months for single or multi-site CoC certificate holders that meet at least one of the following criteria:
- 100% of the seafood handled at all sites is certified seafood; or
  - Conduct only 'trading' activities directly as defined in [Table 5](#) and do not use any contract processors to handle certified product (contract transport and storage is permitted); or
  - Only handle certified product in sealed boxes or containers and do not repack, process repackage or alter sealed boxes in any way.

**Guidance 11.3.1.1**

This includes any business-to-business packed product, such as sealed boxes, pallets, sealed bags, etc. Pallet-level containers may be broken down provided that individual sealed boxes or containers are not altered. Companies that meet this criteria could include distributors, wholesalers or storage facilities.

- 11.3.1.2 A frequency of 12 months for all other certificate holders.

**Guidance 11.3.1.2**

All Group and CFO CoC certificate holders require annual surveillance audits.

- 11.3.1.3 For Group CoC clients and CFO clients with multiple sites, the central office and a sample of sites shall be audited as dictated in [section 10.5](#) and [Table 9](#) respectively.
- 11.3.1.4 The surveillance audit's timing may be advanced or delayed by up to 90 days before or after the due date as necessary to coordinate a suitable date.

- 11.3.2 The CAB shall carry out unannounced, on-site surveillance audits at a minimum of 1 or 1%, whichever is greater, of all their clients each year.

- 11.3.2.1 The CAB shall prioritise clients that have been identified at high risk for product substitution by the MSC, the accreditation body or through receipt of a complaint.
- 11.3.2.2 The CAB may inform the client of a 6 month surveillance window in which the audit can occur, but shall provide no notice of the actual date.

**Guidance 11.3.2.2**

Unannounced audits are intended to provide a more accurate picture of a client's day-to-day conformity with [MSC CoC Standard](#), as the client will not have any time to prepare specifically for the audit.

For unannounced audits, entry must be granted to the auditor within 30 minutes of their arrival. Entry cannot be refused on the basis of a responsible person not being available, or another audit being conducted on the same day, and time limits for document provision can still be set.

At least on an annual basis, the CAB will calculate the number of unannounced audits. This number is calculated as 1% of the current

number of clients (rounded to the nearest whole number), or 1 in the case the CAB has fewer than 100 clients.

If the CAB has not had any clients identified as high risk due to information received by the MSC or accreditation body, or a complaint, then the CAB can use their own risk assessment to select clients or can choose randomly.

11.3.3 Surveillance audits can be remote for certificate holders that meet all of the following criteria:

- 11.3.3.1 Conduct only 'trading' activities directly as defined in [Table 5](#);
- 11.3.3.2 Do not take physical possession of certified products;
- 11.3.3.3 Do not use contract processors or packers for certified products;
- 11.3.3.4 Are located in a country with a Transparency International CPI score of 41 or above (<http://cpi.transparency.org>).

#### **Guidance 11.3.3**

Trading companies that are eligible for remote surveillance audits can use contracted storage or transport companies, but cannot use subcontractors that do processing or packing/repacking.

11.3.4 The CAB shall have a documented procedure to determine when it should do any of the following:

- 11.3.4.1 Conduct expedited audits; and/or

#### **Guidance 11.3.4.1**

For expedited audits entry cannot be refused on the basis of a responsible person not being available and time limits for document provision can still be set.

- 11.3.4.2 Request and examine documentation related to a client's operations.

11.3.5 The CAB's procedure in [11.3.4](#) shall take account of information received including:

- 11.3.5.1 Complaints;
- 11.3.5.2 Notification of changes in personnel, site or management system procedures;
- 11.3.5.3 Information from the MSC, the accreditation body and/or MSCl.

11.3.6 The MSC can require a CAB to conduct an expedited audit when information has been received indicating a potential risk to the Chain of Custody, but where responsibility is not clear. In this case:

- 11.3.6.1 The MSC will provide the CAB with a written request to conduct the audit which shall include any relevant information or evidence;
- 11.3.6.2 The MSC and the CAB shall agree on the full cost of the audit in writing in advance of the audit;
- 11.3.6.3 The MSC will reimburse the CAB for the full cost of the audit;

- 11.3.6.4 The MSC can require that these audits be attended by the accreditation body or a representative of MSC.

**Guidance 11.3.6**

The MSC will require unannounced audits in cases where there is a risk of a breach in the Chain of Custody but there is inadequate information to raise a complaint against a specific CoC certificate holder.

This is particularly relevant where a product authentication test indicates substitution or mislabelling but does not confirm at which step in the supply chain the problem occurred. In these cases, unannounced audits at various steps in the supply chain may be warranted in order to determine the source of the issue.

## **11.4 Recertification**

- 11.4.1 All CoC certificates shall remain valid, subject to satisfactory performance, for a maximum of 3 years.
- 11.4.1.1 The CAB may extend a client's certificate by up to 90 days in order to accommodate audit scheduling by placing a request in the scheme's database.
- 11.4.2 The CAB shall perform a complete recertification audit at the end of each certificate's period of validity.
- 11.4.3 The CAB shall follow all relevant sections of the MSC CoC CR as for an applicant.
- 11.4.4 For Group CoC clients, the site sample plan shall be determined as for initial audits.
- 11.4.5 For CFO clients with multiple sites, the site sample plan shall be the same as for surveillance audits.