Marine Stewardship Council Chain of Custody program

# Pre-audit checklist for single and multi-site organisations (Version 2.1)

### **About this checklist**

The pre-audit checklist allows you to determine how much of the **MSC Chain of Custody (CoC) Standard: Default Version** your organisation currently meets and where you will need to make adjust your operations before the certification audit to ensure full compliance. This checklist can also be used if you are handling ASC certified products. For ASC, please also use the [ASC supplementary checklist](https://asc-aqua.org/wp-content/uploads/2023/05/ASC-Chain-of-Custody-Checklist-Guide-May-2023.pdf) for supply chain companies. Please check that your organisation meets the eligibility criteria for both the MSC and ASC Standards as applicable – the criteria can be found in the preface of the MSC [CoC Default Standard](http://www.msc.org/docs/coc-standard-default-v5), the [ASC CoC Standard](https://asc-aqua.org/wp-content/uploads/2024/04/ASC-CoC-Module-v1.3-FINAL-17-April-2024.pdf), and in the *[Get Certified! Your guide to the MSC and ASC Chain of Custody certification process](https://www.msc.org/docs/coc-default-get-certified)*.

**Disclaimer:** This checklist is intended as guidance only. Following this document is not a fully comprehensive way of preparing for an audit against the MSC Standard. The MSC recommends that all organisations read the MSC Chain of Custody Standard: Default Version 5.1 in full and evaluate the procedures specific to your organisation. This checklist and its content are copyright of Marine Stewardship Council – © Marine Stewardship Council 2023. All rights reserved. The official language of this checklist is English. The definitive version is maintained on the MSC’s website [www.msc.org](http://www.msc.org). Any discrepancy between copies, version or translations shall be resolved by reference to the definitive English version and the English MSC scheme documents. If you are unsure on any subject covered, or would like to provide feedback on how we can improve this tool, please contact the MSC at standards@msc.org

**Table 1:** The MSC Pre-Audit Checklist

| **Requirement** | **What to do?** | **Does my organisation meet this already?  Yes | No** | **What changes need to be made?** |
| --- | --- | --- | --- |
| **Principle 1: Certified products are purchased from certified suppliers** |
| **1.1** A process to ensure that all certified products are purchased from certified suppliers, fisheries, or farms. | Check which of your suppliers are Chain of Custody certified on [MSC Find a Supplier](http://www.msc.org/where-to-buy/find-a-supplier) or [ASC Find a Supplier](https://www.asc-aqua.org/what-you-can-do/take-action/find-a-supplier/). When placing orders, MSC/ASC certified seafood must be specifically requested. |  |  |  |
| **1.2** A process to confirm the certified status of physical products on receipt. | You should have a system in place for managing ‘goods-in’. Can your staff identify when certified seafood is coming into the business? What steps do your staff take to identify and check certified against non-certified seafood on arrival? |  |  |  |
| **1.3** Products in stock at the time of initial certification can be proven to come from a certified supplier, fishery or farm and comply with the relevant sections of the MSC Chain of Custody Standard. | You should be able to prove to your auditor that certified product in inventory is from a certified supplier. As your organisation bought this product before seeking certification you may have to go back to your supplier for proof. |  |  |  |
| **Principle 2: Certified products are identifiable** |
| **2.1** Certified products are identified as such at all stages of purchasing, receiving, storage, processing, packing, labelling, selling, and delivering, except for sales invoices to final consumers. | Your staff must take steps to label and clearly identify certified seafood once it is in your business and until it is sold and/or delivered. Walk through your premises and/or review online systems – is labelling sufficient for anyone to differentiate certified from non-certified seafood in records and on physical products? |  |  |  |
| **2.2** Products that are sold as certified are identified as certified on the line item of the related invoice, except for sales invoices to final consumers. | Your invoices should allow for specific identification of the certified seafood that you sell. This can be done by using the acronym MSC or ASC, the Chain of Custody code, or a unique product code (which is communicated to your customer). Check that it is easy for you to identify certified product on your suppliers’ invoices. |  |  |  |
| **2.3** Your organisation operates a system to ensure packaging, labels, menus, and other materials identifying product as certified can only be used for certified products. | You must have processes and/or systems that prevents staff/equipment from using the wrong packaging and labels now. Can these also be used effectively for certified and non-certified seafood? |  |  |  |
| **2.3.1 & 2.3.2** Products sold as certified must be labelled with the correct species, catch area and origin, if this information is shown. | If you identify the seafood species or catch area/origin on the product label, you must follow the labelling legislation of the country where the product will be sold. What steps are taken to verify label information? |  |  |  |
| **2.4** Your organisation can only promote products as certified or use the MSC/ASC label if granted approval under the terms of the licence agreement. | If your organisation wants to use the MSC or ASC label, follow the [MSC Ecolabel User Guide](https://www.msc.org/documents/logo-use/msc-ecolabel-user-guide) or [ASC Logo User Guide](https://www.asc-aqua.org/our-logo/logo-user-guide/) and get written approval and a licence agreement from MSCI (Marine Stewardship Council International). |  |  |  |
| **Principle 3: Certified products are segregated** |
| **3.1** Certified products must not be substituted with non-certified products. | You must keep certified products physically segregated. It is not specified how this must be done but it can be as simple as using different colour boxes or different refrigerator spaces for certified seafood. You should be aware of the risk of your staff picking the wrong product and have procedures built into their workflow to avoid this. |  |  |  |
| **3.2** Certified and non-certified product cannot be mixed if your organisation wishes to make a claim, except in 3.2.1 below  | If you wish to use the MSC or ASC label on a product you must have systems in place to prevent mixing of certified and non-certified product. |  |  |  |
| **3.2.1** If non-certified seafood is used as an ingredient in certified products, this must comply with the non-MSC/ASC certified seafood ingredients rules. | The MSC does allow the use of non-certified seafood ingredients provided they do not exceed a given proportion of the product’s seafood component. Make sure product development staff are familiar with the [MSC rules](https://www.msc.org/for-business/use-the-blue-msc-label/guidelines) and [ASC rules](https://www.asc-aqua.org/our-logo/logo-user-guide/), and keep records of these calculations for the auditor to check. |  |  |  |
| **3.3** Products certified against different recognised certification schemes that use the MSC CoC Standard must not be mixed if the organisation wishes to sell the product as certified, unless 3.3.a or 3.3.b apply. | The MSC shares its Chain of Custody Standard with the ASC. To make a claim about the certified status of a product, your systems for segregation must also work for other schemes. MSC and ASC certified salmon should be clearly segregated and not mixed. |  |  |  |
| **3.3.a** Your organisation has permission to do so. | Products may show both the MSC and ASC label if approved by MSCI. For example, a fish pie containing MSC haddock and ASC prawns can show both labels if MSCI approval has been granted as part of the product approval process. See [the MSC Ecolabel User Guide](https://www.msc.org/for-business/use-the-blue-msc-label/guidelines) or [ASC Logo User Guide](https://www.asc-aqua.org/our-logo/logo-user-guide/) for more information.  |  |  |  |
| **3.3.b** The same product is certified against multiple recognised certification schemes that use MSC Chain of Custody. | If the seafood comes from a **source** that is certified to two or more schemes that also use MSC Chain of Custody, then both labels can be used – with permission from MSCI. For example, a seaweed fishery that is certified to both MSC and ASC Standards.  |  |  |  |
| **3.4** If products with different seaweed production categories are mixed, they shall thereafter carry the product identification category ASC-MSC. | Seaweed products are categorised as ASC, MSC, or ASC-MSC, depending on the assigned seaweed production category outlined in Guidance 2.1 of the [MSC CoC Default standard](https://www.msc.org/docs/coc-standard-default-v5#page=10). It is crucial to confirm the accurate categorisation of your seaweed products. If you plan to use only the MSC or ASC label (production category A, Bii, or Cii), ensure there is no mixing of seaweed from different production categories.Clearly segregate by origin category and maintain this separation at every stage until applying the appropriate claim. If different seaweed production categories are mixed at any stage, designate the product identification category as "ASC-MSC". |  |  |  |
| **Principle 4: Certified products are traceable, and volumes are recorded** |
| **4.1** Your organisation has a traceability system that allows 4.1.a and 4.1.b below. | Check that your organisation’s existing traceability system can meet these requirements and if not, identify what changes you need to make. |  |  |  |
| **4.1.a** Any product or batch sold as certified can be traced back from the sales invoice or point of serving to the certified supplier. | Follow your product flow records – can someone external to your organisation identify the flow of product from the point of sale back to your supplier? Can this system be used for all your certified products?  |  |  |  |
| **4.1.b** Any product bought as certified and identified as certified upon receipt can be traced forward from point of purchase to point of sale or serving. | Follow your product flow records – can someone external to your organisation identify the flow of product from your supplier to the point of sale? Can this system be used for all products specifically purchased as certified?  |  |  |  |
| **4.2** Traceability records must link certified product at every stage between purchase and sale/serving. | Identifiers and codes used by your organisation must show certified product flow through your operations. This must be clear to someone external to your organisation (i.e. the auditor). |  |  |  |
| **4.3** Records of certified product must be accurate, complete, and unaltered. | Keep product records in the same state as sent by your supplier. This also applies to records created by your organisation. |  |  |  |
| **4.3.1** Where records are changed, this must be clearly documented including the date and name or initials of the person making the changes. | If your organisation needs to make changes to internal or external records (e.g. for a product rejection), mark these changes with the date and name of the person. |  |  |  |
| **4.4** Records must be maintained that allow quantities of certified products bought and sold (or received and dispatched) to be calculated. | These records must allow the auditor to conduct an input-output reconciliation (which is also called a balance calculation).  |  |  |  |
| **4.4.1** If selling to final consumers, all records of purchases and receipts need to be kept but sales records to final consumers do not need to be recorded. | If your organisation sells to final consumers as well as to other businesses and can distinguish between these sales (for example, a fishmonger selling mostly to the catering trade but also out of a small shop at weekends) - you do not need to record the sales to final consumers. |  |  |  |
| **4.5** If processing or packing / repacking occurs, records must allow for conversion rates to be calculated for certified outputs over certified inputs for any batch or period of time. | Your organisation must be able to calculate conversion rates (yield) when processing, packing, or repacking takes place. This also applies if these activities are subcontracted. |  |  |  |
| **4.5.1** These conversion rates must be justifiable and accurate. | The actual conversion rate is not important for Chain of Custody if your organisation can demonstrate why and how it has been calculated. |  |  |  |
| **4.6** Only sell products as certified that are covered by your scope of certification. | Whoever is responsible for procurement/buying must be knowledgeable of when a scope extension is necessary, the timeframes for doing so, and who at your certification body these changes must be communicated to. |  |  |  |
| **Principle 5: The organisation’s management system addresses the requirements of this Standard** |
| **5.1. Management and training** |
| **5.1.1** Your organisation operates a management system that addresses all requirements in this Standard. | This includes the systems, policies and procedures used to ensure your organisation meets the Chain of Custody Standard. For small or straightforward operations, written documentation may not be necessary, if the responsible staff understand and can implement procedures related to this Standard. |  |  |  |
| **5.1.2** Responsible personnel are trained and competent to ensure conformity with this Standard. | These are members of staff/contractors/volunteers who make decisions or carry out procedures that can affect the integrity of certified seafood. They need to be able to explain to an auditor what their role is in ensuring product integrity and the auditor will interview staff to check this. You should keep evidence to show that training exists and/or has been carried out. |  |  |  |
| **5.1.3** Maintain records that demonstrate conformity with this Standard for a minimum of 3 years or for the duration of the product’s shelf life, if longer than 3 years. | These records typically include purchase records of certified products, internal traceability records, staff procedures, and training documentation. |  |  |  |
| **5.1.4** Appoint a CoC contact person who is responsible for all communication with your certification body and can respond to any requests for information or documents relating to Chain of Custody conformity. | Preferably just one staff member communicates with your auditor and/or certification body on behalf of your organisation (this can be the same person responsible for your Chain of Custody certification). |  |  |  |
| **5.2 Reporting changes** |
| **5.2.1** Inform your certification body in writing or by email within 10 days of the changes described in 5.2.1.a, 5.2.1.b, and 5.2.1.c below. | Make sure whoever is responsible for communicating with your certification body is aware of these timelines.Ensure there is a contingency plan to inform the certification body in case the current contact person decides to depart from the company. |  |  |  |
| **5.2.1.a** New CoC contact person. | Within 10 days of assigning a new person to be responsible for managing your Chain of Custody certificate and/or communicating with your certification body. |  |  |  |
| **5.2.1.b** New supplier for certified products. | Within 10 days of receiving certified product from a new supplier (as defined in your supplier list at the latest audit). |  |  |  |
| **5.2.1.c** New certified species received (scope extension). | Within 10 days of receiving product made from a new certified species (as defined in your certificate scope list at the latest audit). |  |  |  |
| **5.2.2** Gain written approval from your certification body before making any of the following changes in 5.2.2.a to 5.2.2.e below. | Make sure whoever is responsible for communicating with your certification body is aware of these requirements and timelines. |  |  |  |
| **5.2.2.a** Undertake a new activity related to certified products (scope extension) | Get approval from your certification body before starting a previously undeclared activity with certified seafood (i.e. an activity not listed in your certificate scope at your last audit). For example, if your organisation has been trading products but is now going to open a distribution warehouse, this counts as a new activity (please see definitions for scope and trading in [Table 2](#table2)).  |  |  |  |
| **5.2.2.b** Selling or handling product certified against different recognised certification schemes that share MSC Chain of Custody (scope extension). | Get approval from your certification body for ASC certified products or other schemes that use MSC Chain of Custody. |  |  |  |
| **5.2.2.c** Using a new subcontractor that will process, pack, or repack certified products. | Get approval from your certification body before using a new processing or packing subcontractor for certified seafood.  |  |  |  |
| **5.2.2.d** Handling seafood that is under MSC fishery or ASC farm assessment if your organisation is part of the fishery/farm. | Get approval from your certification body before using seafood that is not yet certified (only if your organisation is part of the fishery or farm assessment). |  |  |  |
| **5.2.2.e** Adding or changing a site address or company name. | Get approval from your certification body before adding a new site or changing a site or company name. |  |  |  |
| **5.3 Subcontractors, transport, and contract processing** |
| **5.3.1** All subcontractors handling certified product comply with the relevant requirements of this Standard. | A subcontractor by MSC definition is an organisation that does not legally own, buy, or sell certified product. The auditor will check your organisation has control over subcontractors to ensure they comply with the MSC CoC Standard.  |  |  |  |
| **5.3.2** Maintain an up-to-date record of the names and addresses of all subcontractors handling certified product, except for transport. | Keep one list of all subcontractors that you can show the auditor. |  |  |  |
| **5.3.3** Inform any non-certified contract processors that they will be audited before your organisation can use them for certified product and once a year thereafter. | The auditor will conduct at least one traceability test and input-output reconciliation with your contract processor. If there is certified product onsite the auditor will also cross-check dispatch and receipt records, product details and volumes between your organisation and the processor.  |  |  |  |
| **5.3.4** Be able to request certified product records and give auditors access to products handled by subcontractors. | The auditor may wish to see traceability records for your certified product or check certified products handled by your subcontractors. |  |  |  |
| **5.3.5** Have a signed agreement with all subcontractors that transform, process, or repack certified products – covering the points in 5.3.5.a and 5.3.5.b below. | The following requirements can be written into a new or existing contract but must cover all points. This applies even if your subcontractors have their own Chain of Custody certification. |  |  |  |
| **5.3.5.a** The subcontractor has systems in place to ensure traceability, segregation, and identification of certified product at every stage of handling. | Your organisation needs to be confident that subcontractors are identifying, segregating, and tracing your certified product throughout their operations and are able to describe how they are doing this to the certification auditor. |  |  |  |
| **5.3.5.b** The subcontractor allows the MSC (or designated agent) and the certification body to access the site and to check records of certified products. | The MSC or certification auditor may need to make a site visit (for example, for the annual audit of a contract processor or for an investigation). |  |  |  |
| **5.3.6** Your organisation does not knowingly ship or receive product transported on or received from vessels on RFMO blacklists. | If you receive seafood directly from fishing vessels, or use vessels in shipping, you can check for up-to-date lists of IUU (illegal, unreported and unregulated) vessels in RFMO websites (e.g. <http://iuu-vessels.org/iuu>). |  |  |  |
| **5.3.7** Maintain records of all contract-processed certified products, including:* Received product (volumes and product details).
* Dispatched product (volumes and product details).
* Dates of dispatch and receipt.
 | These records enable the input-output reconciliation and traceability test to be conducted across the subcontractor and your organisation. This applies if you subcontract to processors or if you do contract processing for others. |  |  |  |
| **5.3.8** If your organisation performs contract processing you must record the name and Chain of Custody code for all customers since the previous audit. | This happens when your organisation is subcontracted by another organisation with Chain of Custody, whereby your organisation does not own or buy/sell the certified product. |  |  |  |
| **5.4 Non-conforming product** |
| **5.4.1** Have a process to manage non-conforming product that includes 5.4.1.a to 5.4.1.e below.  | This can happen when: * Your organisation cannot confirm product with the MSC ecolabel is from a certified source, for example, if the purchase order states MSC but the invoice received does not.
* Your supplier informs you that they accidentally sold you non-conforming product.
* A staff member realises at the end of the run that the production line packed non-certified seafood into boxes with the MSC and/or ASC logo.

If you have a recall system in place you can use this as a model to deal with non-conforming product for Chain of Custody. |  |  |  |
| **5.4.1.a** Immediately stop selling non-conforming product as certified. | Hold the product in question. This can refer to a batch, pallet, box, shipment, etc. depending on the specific circumstances.  |  |  |  |
| **5.4.1.b** Inform your certification body within 2 days of detecting the non-conforming product and provide your certification body with information to check the certified status of the product. | Relevant information to provide to the certification body is likely to include delivery notes, invoices, product specification instructions, and product run reports. |  |  |  |
| **5.4.1.c** Identify why the product is non-conforming and implement measures to prevent re-occurrence, where necessary. | Preventative actions should reflect the source of problem and may involve, for example, re-training staff or re-writing ‘goods-in’ procedures. |  |  |  |
| **5.4.1.d** Where the non-conforming product cannot be proven to come from a certified source, re-label/re-pack this product so it cannot be sold as certified. | Change the status of any remaining product from that batch/pallet/box/shipment to non-certified. |  |  |  |
| **5.4.1.e** Inform all affected customers within four (4) working days of detecting the non-conforming product if it has already been sold or shipped as certified. | Contact customers you have sold product to (identified as certified) but have been sent non-certified product instead. |  |  |  |
| **5.5 Requests for traceability and supply chain assurance** |
| **5.5.1** Cooperate with the MSC and certification body requests for traceability documents or sales/purchase records for certified products. | The MSC or your certification body may ask for these records in the event of a supply chain investigation. |  |  |  |
| **5.5.1.1** Provide documentation within five (5) calendar days of request. | Financial details may be removed but otherwise records must be unaltered. If, in exceptional circumstances, you cannot meet this deadline you can ask for a justified extension. |  |  |  |
| **5.5.2** Allow the MSC or the certification body to collect certified seafood samples for the purposes of DNA testing. | Product samples may be taken by an auditor as part of the MSC’s annual DNA testing or for an investigation.  |  |  |  |
| **5.5.3** If the test identifies product as non-conforming, your organisation must:* Investigate the potential source.
* Present the findings from this investigation to your certification body.
* Cooperate with further sampling and investigation.
 | If a test result shows the seafood to be non-conforming (see 5.4.1), you must conduct an internal investigation. This is to see if the problem emerged within your operations or came from further up the supply chain (for example, the product was sold mislabelled by a certified supplier). If the problem originated within your operations, your organisation would need to have a corrective action plan to address it.  |  |  |  |
| **5.6 Specific requirements for under-assessment product** |
| **5.6.1** Organisations can only buy seafood that is under assessment if they are, or are part of, the MSC fishery or ASC farm that is undergoing assessment. | Before buying under-assessment seafood, check if your organisation is the MSC fishery or ASC farm, or a named member of the fishery client group/same legal entity as the farm, which is undergoing assessment for certification. |  |  |  |
| **5.6.2** If handling under-assessment seafood, the organisation must:**a.** identify and segregate all under-assessment products.**b**. keep traceability records of under-assessment products back to date of harvest.**c.** ensure under-assessment products are not sold as certified until the fishery or farm is certified. | Ensure that any products from an under-assessment MSC fishery or ASC farm are identified and kept separate from all other products.Keep records that show full traceability of the product back to the fishery or farm’s Unit of Certification, including the date of harvest.Not sell any products from an under-assessment MSC fishery or ASC farm until the Public Certification Report is published on the MSC or ASC website, announcing that the fishery or farm is certified. |  |  |  |
| **5.7 Specific requirements on forced and child labour** |
| **5.7.1** Meet the MSC Labour Eligibility Requirements. | Ensure that your organisation does not have any convictions for forced or child labour (section 3 of MSC [Labour Eligibility Requirements](https://www.msc.org/docs/default-source/default-document-library/for-business/program-documents/msc-labour-eligibility-requirements.pdf)). Additionally if your organisation conducts specific activities as indicated in [section 5.1.1](https://www.msc.org/docs/default-source/default-document-library/for-business/program-documents/msc-labour-eligibility-requirements.pdf#page=11) of the MSC LER you need to either:a) submit an MSC Chain of Custody Labour Self-Assessment form and sign an agreement to complete an MSC-commissioned labour audit if required by the MSC, or b) provide evidence to the MSC auditor of having completed an on-site labour audit that complies with the MSC third-party labour audit requirements.  |  |  |  |

**Table 2:** Scope activity definitions

|  |  |
| --- | --- |
| **Activity** | **Definition** |
| **Trading fish (buying/selling)**  | This will likely be applicable to all companies, except for subcontractors that do not buy certified product. |
| **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 organisations are not required to be certified for CoC unless they also take legal ownership. In some cases, however, using a transport organisation could increase the risk to such a level that the CAB might require its client to request the transport organisation to become CoC certified (e.g., a vessel involved in transhipping, or a vehicle/well boat collecting bulk/unpacked products from more than one (1) certified farm). |
| **Storage** | Product held in a storage area. |
| **Distribution** | Companies that receive sealed containers, pallets, etc. and deliver them to customers or other members of their group. |
| **Wholesale** | Companies that receive sealed containers, pallets, etc. and sell them to customers or other members of their group. |
| **Packing or repacking** | When the packaging is changed but the product remains the same. |
| **Processing** | Includes primary or secondary processing value added processing, fish preparation or any other activity where the product is changed (except for ‘retail to consumer’ and ‘restaurant/take away to consumer’). |
| **Contract processing** | Any certificate holder that conducts processing on behalf of the product owner (does not legally own the seafood). |
| **Use of subcontractor** | Any certificate holder that uses a certified or non-certified subcontractor to process, repack or transform certified product on their behalf. |
| **Retail to consumer** | Where the product is purchased, taken away and prepared by the consumer. This includes fish counters at retailers, fish mongers, and markets selling directly to consumers. |
| **Restaurant/take away to consumer** | Any foodservice situation where the product is prepared on-site and sold directly to consumers. |
| **ASC Aquaculture** | This shall only be used for any entity involved in the farming of seaweed (Seaweed Production Categories Bi, Bii, Ci and Cii, as per ASC-MSC Seaweed Standard Table 2) certified to the ASC-MSC Seaweed Standard. If there is processing entity included in the seaweed production certificate, separate “processing” activity shall also be selected. |
| **MSC Harvest** | This shall only be used for vessels undergoing fishing, or collection of seaweed from the wild environment (Seaweed Production Category A, as per ASC-MSC Seaweed Standard Table 2) that are applying for and being certified to the MSC CoC Standard. This scope shall include vessels as named sites on the CoC certificate. If they are processing on-board, “processing” shall also be selected. |
| **Manual off-loading** | This shall be used for any entity that manually off-loads (conducted by-hand, without machinery) product directly from fishing or aquaculture vessels, using permanent, temporary, or sub-contracted staff at the first point of landing. |
| **Handling under-assessment product** | This refers to a certificate holder that handles or subcontracts the handling of under-assessment product. This scope is only applicable to fishery client group members, and their subcontractors. |