**MSC Chain of Custody Remote Audit Risk Assessment and Variation Form v 1.4**

MSC program documents reference:

* [MSC Derogation 3: Covid-19 Fishery and Chain of Custody Remote Auditing (v4.0)](https://mscportal.force.com/interpret/s/article/Derogation-3-Covid-19-Fishery-and-Chain-of-Custody-Remote-Auditing)
* [MSC Chain of Custody Certification Requirements (v3.1)](https://www.msc.org/docs/default-source/default-document-library/for-business/program-documents/chain-of-custody-program-documents/msc-chain-of-custody-certification-requirements-v3.pdf?sfvrsn=cee69a1c_21)
* [MSC General Certification Requirements (v2.4.1)](https://www.msc.org/docs/default-source/default-document-library/for-business/program-documents/general-certification-requirements/msc-general-certification-requirements-v2-4.pdf?sfvrsn=d1b5f2f_20)

This form details the information required from Conformity Assessment Bodies (CABs) to enable the MSC to consider a CAB application to vary from the requirement and/or Derogation preventing initial on-site audit. Please note this form should only be used for Remote Audit variation request related to Covid-19 factors (i.e. MSC Covid-19 Derogation 3 clause 1.1.b and 1.1.c). This form may be used for remote initial audit needed due to national travel restrictions (clause 1.1.a) to be uploaded onto the scheme database, but a variation request would no longer be required (as per Derogation 3 clause 1.5.c).

Once this form is completed, please email to [supplychain@msc.org](mailto:supplychain@msc.org).

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| **Subject** | **Details** |
| **Date submitted to the MSC** |  |
| **CAB** |  |
| **Lead auditor or CAB program manager** |  |
| **Applicant/CoC holder name** |  |
| **CoC code** |  |
| **Scheme requirement(s) for which variation requested** | CoC CR 7.1.6.1 |
| If Covid-19 related factor(s) is applicable, please also provide the factor(s) that applies *i.e.* 1.1. b and/or 1.1.c (MSC Covid-19 Derogation 3) |  |
| If Covid-19 related factor(s) is applicable, please provide evidence. For example clause: 1.1.b. the reason and concern; 1.1.c attachment of CAB/ company policy |  |
| **CoC holder scope activities** |  |
| **Species handled** |  |

**Remote audit feasibility**

| **Area** | **Guidance** | **Y/N/Unknown** | **Risk to quality or integrity of auditing process: high, medium, or low** | **Justification for risk rating**  **Please include measures to be taken to reduce risks rated high / medium** |
| --- | --- | --- | --- | --- |
| **Does the applicant/CoC holder have an adequate infrastructure for remote audits?** | If the applicant/CoC holder has good internet connectivity as well as access to software that makes a remote audit more accessible. |  |  |  |
| **Does the applicant/CoC holder have an electronic based quality management system?** | An electronic based quality management system makes it easier to access details remotely. |  |  |  |
| **Is the applicant/CoC holder able to submit pre-audit documentation?** | A key element of remote auditing is preparation. If the applicant/CoC holder can submit documentation prior to the audit, this would assist with conducting the audit remotely. |  |  |  |
| **Does the auditor scheduled for the audit speak the same language as the applicant/CoC holder?** | If an interpreter/translator is needed for the audit, this will significantly reduce the efficiency and practicality of a remote audit. |  |  |  |
| **Are the appropriate confidentiality, security, and data protection systems in place?** | If the CAB and/or the applicant/CoC holder does not have the appropriate systems to ensure these elements, the audit cannot take place remotely. |  |  |  |

**Risk Factors**

| **Area** | **Guidance** | **Y/N/Unknown** | **Risk to quality or integrity of auditing process: high, medium, or low** | **Justification for rating**  **Please include measures to be taken to reduce risks rated high / medium** |
| --- | --- | --- | --- | --- |
| **Is the applicant/CoC holder certified to other accredited standards?** | If the applicant/CoC holder is certified to other accredited standards, especially those with elements of traceability, it provides greater confidence in their ability to meet the requirements in the CoC Standard. |  |  |  |
| **Is the applicant/CoC holder a processor and/or packer?** | If the applicant/CoC holder is a processor and/or packer, this would be considered a higher risk than a trader or a storage company, due to the number of steps where errors could occur. |  |  |  |
| **Does the applicant/CoC holder proposed scope include fishing and/or carrier vessels at sea?** | If the applicant/CoC holder’s scope includes vessels operating at sea that cannot be audited on-site onboard the vessels, there is an increased risk. Good connectivity, access to crew members, onboard and on-landing operations and electronic records (e.g. catch data, logbooks, monitoring, control and surveillance system, observer data) are key in providing greater confidence in auditor ability to verify CoC Standard conformance. |  |  |  |
| **Does the applicant/CoC holder handle certified and non-certified species?** | If the applicant/CoC holder handles certified and non-certified (especially similar-looking species) there is an increased risk of errors. As the auditor is not on-site there is less chance of identifying the mixing risks. For traders and other organisations that do not change the product form, this risk factor is lower. |  |  |  |
| **Does the applicant/CoC holder use non-certified packing or processing subcontractors?** | If the applicant/CoC holder uses non-certified (packing or processing) subcontractors that cannot be audited on-site, there is an increased risk of errors and failure to meet the requirements of the Standard. |  |  |  |
| **Is there a high number of staff are employed by the applicant/CoC holder?** | If the applicant/CoC holder has a high number of staff, especially those physically selecting a label, bag, carton, or similar bearing the ecolabel or logo from amongst other labels or packaging materials, there is an increased risk of errors. It also means that more staff need to be interviewed as per CoCCR 8.2.6.1, which can be challenging in a remote audit. |  |  |  |
| **Does the applicant/CoC holder have an internal audit program?** | This is not a part of the MSC Default or CFO CoC standard, but if the applicant/CoC holder has an internal audit program, this is an indicator that the applicant/CoC holder will be more likely to meet the requirements of the Standard. |  |  |  |

| **Overall assessment, justification and determination that an effective remote audit is feasible, the measures to manage the identified risks and any additional information.** |
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**Template information and copyright**

This document was drafted using the ‘MSC Chain of Custody remote audit risk factors form v1.1’.

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| **Template version control** | |  |
| Version | Date of publication | Description of amendment |
| 1.0 | 7 January 2021 | N/A – First version |
| 1.1 | 19 January 2021 | Amended so that it can be used for consecutive remote audits, as well as for initial remote audits. This includes changes to the title and references to CoC holders (as well as applicants).  Amended to include rating of risks and assessment of how the audit is effective remotely. This was done by adding columns for risk rating and justification and by including a section at the end for the CAB to explain how they determined a remote audit was feasible and risks managed.  Added one new risk factor of whether the applicant/certificate holder had previously had an on-site MSC CoC audit. This is most relevant to CoC holders but could be applicable to an applicant if they were a re-joining company. |
| 1.2 | 30 March 2021 | Amended to match the revised risk factors published in **Derogation 3: Covid-19 Fishery and Chain of Custody Remote Auditing** |
| 1.3 | 06 May 2021 | Amended to reference **Derogation 3: Covid-19 Fishery and Chain of Custody Remote Auditing** |
| 1.4 | 01 April 2022 | Amended to reference **Derogation 3: Covid-19 Fishery and Chain of Custody Remote Auditing** (v4.0) |

A controlled document list of MSC program documents is available on the MSC website (msc.org).

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