

Covid-19 Risk Considerations

The purpose of this document is to demonstrate the process of risk assessment in the MSC certification system considering the implications of the Covid-19 pandemic. The MSC derogation was written in consideration of the health and wellbeing of those participating in the MSC certification process.

Reference information:

- Global Sustainable Seafood Initiative Management of Extraordinary Events Policy: “Risk Assessment: Scheme Owners shall ensure a risk assessment on the impact of the extraordinary event is conducted on the certification status of certified organizations. Guidance: This risk assessment should be carried under guidelines from the Scheme Owner and the IAF ID3:2011 “Management of Extraordinary Events or Circumstances Affecting ABs, CABs and Certified Organizations” (see: www.iaf.nu; criteria for CBs and ABs respectively listed in Section 3 and Section 4). Based on background information and the current context, the goal of the risk assessment is to confirm that the certified organization is equipped to maintain the practices and processes guaranteed by their certificate. The Scheme Owner shall establish a procedure to closely monitor the accreditation status of the Certification Body performing inspections/audits for their schemes.”
- MSC Covid derogation, published 28th September 2020
- IAF ID 3: 2011 Management of Extraordinary Events or Circumstances Affecting ABs, CABs and Certified Organisations

Method:

The MSC, Assurance Services International, and MSC accredited conformity assessment bodies, consider risk as a part of the ongoing provision of the assurance system. The response to the Covid-19 pandemic has required a rapid approach to ensure the health and safety of those in the system while balanced with the credibility of allowing use of the MSC certificate.

The MSC continues to engage all parties involved in the MSC certification system, and rely on existing structures to ensure certificate holder compliance.

The MSC continues to monitor the situation of standard application mainly via technical oversight and findings raised by the accreditation provider, Assurance Services International.

Risk identification and assessment:

The MSC is identifying potential risks for certificate holder compliance due to changes associated with Covid-19, and risks associated with the allowances made in the application of the MSC program.

- With the publication of the derogation on 28th September 2020, the MSC has continued to allow the use of **remote audits**. This presents a potential risk to the quality of the audit, and these are the high-risks that have been identified:
 - o Reliability of technology, and variation in application by conformity assessment bodies.
 - o With the shift to the remote audits, quality of information from stakeholder interviews is potentially reduced. There is a need to rely on cross-checking of information.

- Further risks have been identified in the [requirements and guidance document](#) provided to support implementation of the derogation (Tables 1 and G1).
- The high-risk impacts for **fisheries** in terms of certificate holder changes in compliance have been identified as the following:
 - Research programmes for 2020 disrupted or cancelled
 - Decisions and negotiations on fishing opportunities for 2020 postponed
 - Gaps in scientific observer presence on board vessels
- The high-risk impacts for **chain of custody** in terms of certificate holder changes in compliance have been identified as the following:
 - Non-certified product identified and sold as MSC (unintentional and intentional)
 - Remote audits lacking thoroughness of on-site audits, particularly with new companies joining the program and having unidentified gaps in the management system for certification, e.g. processors or repackers.
 - Supply chain disruptions due to site closures and/or social distancing restrictions, or short notice change of processes
- The determination by the CAB to proceed with a remote audit is dependent on the ability of the certificate holder to receive a remote audit, and should consider the risks aligned with [IAF ID 3: 2011](#) guidance. Information collected by the CAB should include the following:
 - To what extent has operation of the management system been affected?
 - Will the organisation need to use alternative sites, if so, are these currently covered under the current certification or will they need to be evaluated?

Mitigation approach:

The MSC, appointed accreditation body, and accredited CABs continue to operate elements of the assurance system. This includes assessments of certificate holders, audits of CAB performance, scheme owner technical oversight and complaint/dispute mechanisms. The MSC program continues to encourage stakeholder participation in the assessment process, and welcomes [reporting of any misuse of the MSC logo](#), and this can be submitted to the MSC for follow up investigation. Since the initial outbreak of the pandemic, the MSC has allowed for remote assessments where travel restrictions have been put in place, and has added allowances for timeline and certificate extensions to protect the health and welfare of those participating in the certification system. From 28th September 2020, the MSC will continue to allow remote auditing and monitor the impact of the Covid-19 pandemic on the certification program.

To mitigate the risks identified above, additional measures have been implemented:

- Remote audit training provided by the MSC. This is accessible via the MSC Online Training Portal.
- CAB management system review by Assurance Services International. This included a review of the following information: training conducted for auditors on conducting remote audits and procedure for conducting remote audits.
- Certificate holders informed that compliance with the standard is required. The period of time that was subject to an extension of timelines or certificates is subject to evaluation at the next assessment or audit.
- Technical oversight by the MSC Science & Standards department on both programs. The purpose of technical oversight is to review documentation to observe trends in the shift from in-person audit to remote and raise any issues on the audit or assessment quality presented with the conformity assessment body.

- CABs required to document the list of certificate holders that are affected by the derogation and share this with the scheme owner and accreditation provider.
- Remote audits shall be conducted aligned with [IAF MD 4:2018](#) IAF Mandatory Document for the Use of Information and Communication Technology for Auditing/Assessment Purposes, considering security/confidentiality and process requirements.