



Marine Stewardship Council

海洋管理委员会

Title: Derogation 7: Chain of Custody Labour Audit Risk Revision

标题: 审核标准调整 7: 产销监管链社会责任审核风险修订

Relevant MSC program document(s) and clause reference(s):

相关 MSC 项目文件和条款:

- MSC Chain of Custody Standard v5.0 (Group and CFO Standards v2.0)
- MSC 产销监管链标准 5.0 版 (集团和 CFO 标准 2.0 版)
 - 5.7.2 (Default and Group); 5.8.2 (CFO Standard)
 - 5.7.2 (通用版和集团版) ; 5.8.2 (CFO 标准)
 - 5.7.3 (Default and Group); 5.8.3 (CFO Standard)
 - 5.7.3 (通用版和集团版) ; 5.8.3 (CFO 标准)
- MSC Chain of Custody Certification Requirements v3.1
- MSC 产销监管链认证要求 3.1 版
 - 8.2.15.b

Effective date: 28 May 2021.

生效日期: 2021 年 5 月 28 日

Expiration date: This derogation will expire on the effective date of the next version of the affected program document.

终止日期: 本《审核标准调整》将于下一版本相关项目文件的生效之日终止。

Issuing authority and date: Dr Rohan Currey, Chief Science and Standards Officer, 9 February 2021

签发人和日期: 科学与标准首席执行官 罗翰·柯里, 2021 年 2 月 9 日

To: MSC Accredited Conformity Assessment Bodies (CABs)

收件人: MSC 认可的合规性评估机构 (CABs, 以下简称审核机构)

Cc: Assurance Services International and Aquaculture Stewardship Council

抄送: 保证服务国际 (ASI) 和水产养殖管理委员会(ASC)

1 Objective of the derogation

1 《审核标准调整》的目的

1.1 This derogation allows Chain of Custody certificate holders, where applicable, to demonstrate compliance to the CoC labour requirements in one of two ways:

1.1 本《审核标准调整》允许产销监管链证书持有者从以下两种方式中选择适用的一种方式证明自己符合 CoC 社会责任要求：

a. By complying with the current CoC labour requirements, or

a. 符合现有 CoC 社会责任要求，或者

b. By completing a self-assessment of labour practices that covers all sites in the certificate.

b. 完成自我评估，自我评估中应包括证书中所有地点反映的社会责任情况。

1.2 This derogation applies to certificate holders, applicants and subcontractors identified as Standard Risk according to Tables 5 and 6 of the [MSC CoC Certification Requirements v3.1](#).

1.2 本《审核标准调整》适用于根据 MSC CoC 认证要求 3.1 版中的表 5 和表 6 认定为标准风险的证书持有者、申请者和分包商。

2 Derogation requirements– certificate holders

2 审核标准调整要求 – 证书持有者

2.1 Organisations identified as Standard Risk shall either:

2.1 被认定为标准风险的组织应当：

a. Follow CoC Standard 5.7.2/5.8.2 ([Default](#) v5.0; [Group](#) and [CFO](#) v2.0) and complete a third-party labour audit and comply with the CoC labour requirements, or

a. 遵循 CoC 标准 5.7.2/5.8.2（通用版 5.0 版；集团和 CFO 2.0 版）的规定并完成第三方社会责任审核，符合 CoC 社会责任要求，或者

b. Submit an [MSC Chain of Custody Labour Self-Assessment Form](#) as part of their CoC audit and agree to complete a labour audit if called upon to do by the MSC.

b. 提交 [MSC 产销监管链社会责任审核自我评估表\[链接\]](#) 做为其 CoC 审核的组成部分，如果 MSC 指定，须同意接受社会责任审核。

2.2 If an organisation proceeds with 2.1.b, they shall:

2.2 如果组织执行 2.1.b，其应当：

a. Complete one self-assessment per certificate.

a. 以证书为单位完成一次自我评估。

b. For organisations with multiple sites and/or subcontractors, complete the self-assessment information shall cover all sites that will be covered by this derogation.

b. 拥有多地点和/或分包商的组织，应完成对本《审核标准调整》涵盖的所有地点的自我评估。

Guidance 2.2.b

指南 2.2b

A separate self-assessment may be completed by subcontractor(s) when it is impractical or impossible to include with the organisation.

如果由组织完成所有地点的自我评估是不可能的或不切实际的，可由分包商独立完成自我评估。

- c. Follow the instructions in the self-assessment form.
- c. 按照自我评估表中的指示进行。
- d. Complete the form by the day of the CoC audit.
- d. 在 CoC 审核之日前完成自我评估表。
- e. Agree to complete a labour audit if required to do so by the MSC.
- e. 如果 MSC 指定要求社会责任审核，须接受和配合完成审核。

3 Derogation requirements – CABs

3. 审核标准调整要求 - 审核机构

- 3.1 The CAB shall send a form to Standard Risk clients when scheduling the CoC audit to determine whether their client has opted for 2.1.a or 2.1.b.
- 3.1 在计划安排 CoC 审核时，审核机构应将表格发送给标准风险客户，以便客户决定选择 2.1.a 还是 2.1.b。
- 3.2 The CAB shall document the client's response in the Chain of Custody audit checklist ([Default and Group v4.1](#); [CFO v2.1](#)).
- 3.2 审核机构应将客户的回复记录在产销监管链审核检查表（通用版和集团 4.1 版；CFO 2.1 版）中。
- 3.3 If the certificate holder opted to apply clause 2.1.a, the CAB shall follow the [MSC Third-Party Labour Audit Requirements v1.0](#).
- 3.3 如果证书持有者选择执行条款 2.1.a，审核机构应按照《MSC 第三方企业社会责任审核要求 1.0 版》的规定执行。
- 3.4 If the certificate holder opted to apply clause 2.1.b, the CAB shall:
- 3.4 如果证书持有者选择执行条款 2.1.b，审核机构应当：
 - a. Send the certificate holder a copy of the self-assessment in advance of the CoC audit.
 - a. 在 CoC 审核之前将一份自我评估表发送给证书持有者。
 - b. Check that the self-assessment is complete by the day of the CoC audit.
 - b. 在 CoC 审核时检查自我评估是否完成。
 - c. Upload the self-assessment to the MSC scheme database with the final CoC audit report.
 - c. 将自我评估表和最终 CoC 审核报告一起上传至 MSC 数据库。

Guidance 3.4

指南 3.4

The self-assessment should be completed ahead of the audit by the certificate holder.

证书持有者须在 CoC 审核之前前完成自我评估。

Guidance 3.4.b

指南 3.4b

The CAB is not responsible for verifying the accuracy of the responses provided in the questionnaire, only for ensuring it is complete and all questions answered.

审核机构不负责核实问卷中答复的准确性，只确保完成问卷并回复所有问题。

- 3.5 The CAB shall maintain a list of certificate holders where this derogation has been applied which shall be made available for MSC or ASI on request.
- 3.5 审核机构应保留按照《审核标准调整》执行的证书持有者名单，以便在 MSC 或 ASI 需要时提供名单。

FAQs and further guidance

常见问题和指南

1. What is the objective of this derogation?

1. 本《审核标准调整》的目的是什么？

The objective of the derogation is to allow for greater flexibility in how affected CoC certificate holders may comply with the CoC labour requirements, given the uncertainty created by the Covid-19 pandemic, while maintaining a mechanism for the MSC to have oversight of where risks or issues may be present in certified supply chains and to respond accordingly.

鉴于新冠疫情所造成的不确定性，本《审核标准调整》的目的是为了使受影响的 CoC 证书持有者在遵守 CoC 企业社会责任要求方面有更大的灵活性，同时 MSC 保留了对经过认证的供应链中可能出现的风险和问题进行监管的机制，并做出相应的反应。

2. When do certificate holders have to complete a labour audit and how will this be verified by the Conformity Assessment Body (CAB)?

2. 证书持有者何时必须完成社会责任审核，合规性评估机构（审核机构 CAB）如何对此进行核实？

Certificate holders will now have a choice whether to complete a labour audit or to complete a self-assessment.

证书持有者现在可以选择完成社会责任审核或完成自我评估。

If a certificate holder chooses to complete a labour audit instead of a self-assessment, then they will need to complete a labour audit by their next CoC audit. The auditor will then verify compliance against the MSC Third-Party Labour Audit Requirements.

如果证书持有者选择完成社会责任审核而不是自我评估，那么他需要在其下一次 CoC 审核前完成社会责任审核。审核员将根据 MSC 第三方企业社会责任审核要求检查其合规性。

If a certificate holder was expecting to complete a labour audit by 28 March 2021 (now extended until 28 May 2021) as per the original derogation and subsequent extension, please note that this will be superseded by the new derogation. Therefore, certificate holders will only need to complete a labour audit by their next CoC audit. This will ensure alignment in expectation between those that opt for an audit vs. a self-assessment.

如果证书持有者原来的根据第一次的社会责任《审核标准调整》通知的要求，需要在 2021 年 3 月 28 日前（现又延长到 2021 年 5 月 28 日）完成社会责任审核，请注意，第一次的社会责任《审核标准调整》通知和后续的延期到期后将由新的《审核标准调整》替代。因此，证书持有者只需要在其下一次 CoC 审核前完成社会责任审核即可。这会确保选择审核方式与选择自我评价方式的一致性。

3. If a Group certificate is stratified and/or uses subcontractors, do all these activities need to be covered in the self-assessment?

3. 如果集团证书是分级的，并且/或者使用了分包商，那么所有这些活动需要包含在自我评估范围内吗？

Yes. If the scope of a certificate includes sites and/or subcontractors that would be classified as Standard Risk, then these activities should be reflected in the content of the self-assessment. Information in the self-assessment should be comprehensive and inclusive to the best of the certificate holders' ability.

是的。如果证书范围包括被列为标准风险的地点和/或分包商，则自我评估的内容中应包含这些活动。证书持有者应竭尽全力使自我评估材料具有综合性和全面性。

If it is not possible to include any subcontractor(s), the subcontractor can complete a separate self-assessment. In such cases, the certificate holder would still be responsible for the subcontractor's compliance as per CoC Standard (Default v5.0; Group and CFO v2.0) clause 5.3.1.

无法涵盖进来的分包商可以进行单独的自我评估。在这种情况下，证书持有者仍对这些分包商是否符合 CoC 标准第 5.3.1 款的要求负有责任（通用版 5.0 版；集团和 CFO2.0 版）。

4. Is the CAB required to audit the self-assessment?

4. 审核机构需要对自我评估进行审核吗？

No, the CAB is required to check the completeness of the self-assessment only.

不需要。审核机构仅需要检查是否自我评估表是否完成。

5. Who will pay for the audit if required by the MSC?

5. 如果 MSC 要求指定进行审核，谁将支付审核费用？

For certificate holders that opt to complete a self-assessment, the MSC reserves the right to commission a labour audit. A labour audit may be commissioned if there are concerns stemming from the content provided in the self-assessment or by random selection. Labour audits in this instance will be funded by the MSC.

对于选择完成自我评估的证书持有者，MSC 保留委托进行社会责任审核的权利。如果在自我评估表格中发现情况，MSC 可委托进行社会责任审核，MSC 也可委托进行随机抽检。社会责任审核费用由 MSC 承担。

6. Where do I find the self-assessment?

6. 在哪里可以找到自我评估？

The self-assessment is available on the MSC website at: www.msc.org/for-business/certification-bodies/supporting-documents.

可登录 MSC 网站查询：www.msc.org/for-business/certification-bodies/supporting-documents。

7. How often does the self-assessment need to be completed?

7. 多长时间进行一次自我评估？

The self-assessment shall be completed annually as part of the CoC audit process. Content should be updated to reflect any changes such as engagement with a new social audit program or changes to the CoC certificate such as new sites added.

做为 CoC 审核流程的一部分，自我评估应每年进行一次。自我评估信息应及时更新以便反映出所有变化，例如参与新的社会责任审核项目，或者 CoC 证书发生变更时，例如增加新地点。

For any questions, please contact the MSC Supply Chain Standards team (supplychain@msc.org). The MSC will continue to monitor the situation and provide any updates.

若有任何问题，请与 MSC 供应链标准团队 (supplychain@msc.org) 联系。MSC 将持续关注进展并及时更新。