

MSC CoC Standard: Principle 4

Revised clauses for stakeholder feedback

P 4.1 The organisation shall operate a traceability system that enables:

P 4.1.1 any product or batch sold as certified to be traced back to the certified supplier.

P 4.1.1.a Organisations purchasing directly from fisheries or fishery client group members (first buyers) shall demonstrate access to fishery-level key data elements (KDEs) for all applicable fishery-related critical tracking events (CTEs) associated with certified products, as defined in the **MSC CTE-KDE Matrix**.

Guidance 4.1.1.a

The *first buyer* in the Chain of Custody organisation may use the MSC KDE self-assessment template to demonstrate their ability to access the relevant KDEs.

The ability to demonstrate access may be undertaken at any stage following purchase of a certified batch. It does not need to be conducted during an audit or under time pressure. The organisation shall ensure that its process is sufficiently robust to be repeated at any time for any applicable batch.

The links between KDEs, certified products or batches and CTEs may be maintained using existing traceability systems, records or identifiers, such as batch, lot, purchase order or product codes. The organisation does not need to use a prescribed system or identifier, provided it can demonstrate a reliable link between the certified product or batch and the applicable KDEs and CTEs.

P 4.1.2 any products identified as certified at the point of receipt to be traced forward from the point of purchase through to the point of sale or serving.

Guidance P 4.1.2

End-of-supply-chain organisations (such as restaurants and fishmongers) are not required to maintain detailed traceability records for servings or sales to final consumers. However, they must retain all records for earlier traceability steps, including product receipt, delivery to sites, and any handling that occurs before final sale.

P 4.2 Traceability records shall link certified product(s) at each relevant critical tracking event (CTE) from point of purchase to point of sale and/or serving.

P 4.2.1 for organisations with activities taking place at sea, maintain traceability records linking certified products at each relevant critical tracking event (CTE) between fishing event and first point of sale, where those events take place within the scope of their certificate.

Guidance P 4.2.1

Offshore activities are considered as those that take place onboard vessels. Critical tracking events (CTE) between the fishing event and first point of sale include any transformation and transfer of the fish or product connected to harvest, pre-processing, processing, packing, storage, transshipment activities.

P 4.3 The organisation shall be able to access the applicable product-level Key Data Elements (KDEs) for each applicable CTE associated with certified product(s), as specified in the MSC CTE-KDE Matrix.

P 4.4 The organisation shall ensure that records are complete, accurate and protected from unauthorised alteration.

P 4.4.1 Where records are amended, the changes shall be clearly documented, including the date of the change and the name or initials of the person making the amendment.

P 4.5 The organisation shall ensure all records required for traceability and record verification exercises during the audit are accessible and provided within the required timeframe prescribed by the auditor.

P 4.6 The organisation shall maintain records that allow the calculation of volumes of certified products.

P 4.7 The organisation shall maintain records of all certified products processed by subcontractors on its behalf. These records shall include:

P 4.7.1 Volumes and product details received.

P 4.7.2 Volumes and product details dispatched/shipped.

P 4.7.3 Dates of dispatch/shipping and receipt.

P 4.8 MSC Fishery Certificate Code

P 4.8 The organisation shall operate a traceability system that enables all certified products within its certification scope to be linked to the relevant MSC Fishery Certificate code(s) (MSC-F-xxxxx).

P 4.9 The organisation shall share the relevant MSC Fishery Certificate Code(s) (MSC-F-xxxxx) with buyers at the point of sale of certified products (excluding sales to final consumers).

Guidance P 4.8 & P 4.9

Within an organisation's operations, the MSC Fishery Certificate code (MSC-F-xxxxx) can be maintained at a certified product or batch level.

End-of-supply-chain organisations (such as restaurants and fishmongers) are not required to share the relevant MSC Fishery Certificate Codes with servings or sales to final consumers.

P 4.10 KDE self-assessment

P 4.10 The organisation shall conduct a KDE self-assessment on a minimum of one product sold as certified prior to each CoC audit and following any significant change to its traceability or data capture procedures.

P 4.10.1 The organisation shall select a certified product, species, ingredient or site for each KDE self-assessment by applying the following criteria in descending order of precedence:

P 4.10.1.a priority shall be given to products purchased directly from a fishery or farm.

P 4.10.2.b priority shall be given to new or higher-risk sites or species; and

P 4.10.2.c the selection shall be rotated to ensure that, where practicable, a different certified product, species, ingredient, or site is selected for each KDE self-assessment.

Guidance P 4.10 Where organisations have multiple certified products or multiple sites within the scope of their certification, the intention remains for one KDE self-assessment to be completed on one certified product, at a minimum.

Once the organisation has completed the KDE self-assessment on all certified species, products or ingredients within its certification scope, repetition of products or ingredients using the KDE self-assessment template is permitted.

P 4.11 Through the KDE self-assessment exercise, the organisation shall:

P 4.11.1 trace the certified product or ingredient through all CTEs involving its transfer or transformation, including those conducted by certified and non-certified subcontractors, from the point of sale back to the initial receiving event.

P 4.11.2 record all KDEs for each applicable CTE.

P 4.12 The organisation shall complete the KDE self-assessment exercise using the official MSC KDE self-assessment template.

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