

# CoC Certification Requirements

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1.0	Scope.....	2
2.0	Normative documents.....	2
2.1	Supporting documents.....	2
3.0	Terms and definitions.....	3
4.0	Structural requirements.....	3
5.0	Eligibility requirements.....	3
6.0	Need for CoC certification.....	4
7.0	Certificate validity and audit cycle.....	5
8.0	Application .....	5
9.0	Site lists.....	9
10.0	Audit planning.....	9
11.0	Unannounced audits.....	11
12.0	Audit Methodology and frequency.....	12
13.0	Conducting audits.....	14
14.0	Opening meeting.....	14
15.0	Auditing subcontractors.....	16
16.0	Interviews.....	17
17.0	Segregation .....	17
18.0	Traceability and record-verification exercises.....	18
19.0	Internal traceback exercise.....	19
20.0	Management of audit findings .....	19
20.2	Non-conformities.....	20
21.0	Closing meeting.....	22
22.0	Incidents and Investigations.....	22
23.0	Certificate management for all CoC organisations.....	23
24.0	Changes to the scope of the certification .....	24

## 1.0 Scope

The MSC Chain of Custody Certification Requirements (CoC CR) define the requirements that Conformity Assessment Bodies (CABs) shall follow when conducting Chain of Custody (CoC) certification and granting certification

CoC certification applies to organisations that take legal possession of certified products and wish to make claims that these products originate from sources certified against:

MSC Fisheries Standard,  
MSC Improvement Program,  
ASC Farm Standard,  
ASC-MSC Seaweed (Algae) Standard, or  
Other standards formally recognised by the MSC.

Where MSC has formal agreements with other certification schemes to share CoC Standards, products certified under those schemes may also be included in CoC certification, provided each organisation includes the relevant products in its certification scope.

While the MSC Improvement Product is not MSC certified fish product, it shares the same Chain of Custody (CoC) Standard and is recognised as a product from a different scheme to MSC. Organisations shall demonstrate segregation between MSC- and/or ASC-certified products, MSC Improvement Products, and non-certified products at all stages of product receipt, storage, processing, packing, transport, and dispatch, where applicable.

## 2.0 Normative documents

The following certification program documents contain provisions which, through reference in this text, become part of the CoC CR. For documents without dates or version numbers, the latest published edition of the document applies.

- a. MSC General Certification Requirements
- b. MSC Forced and Child Labour Eligibility Requirements
- c. MSC Chain of Custody Standard
- d. ASC Supply Chain Module
- e. MSC Improvement Program






### 2.1 Supporting documents.

- MSC Internal Traceback Template
- MSC Risk Assessment
- MSC SCAP Manual for CABs
- MSC/ASC Label User Guide
- The MSC Improvement Program Guidelines
- MSC-MSCI Vocabulary

### 3.0 Terms and definitions

Concepts, terms or phrases used in the CoC CR defined in the MSC-MSCI Vocabulary are indicated with this symbol #.

CoC Models are noted with symbols

	<b>Default model (single and multi site)</b>
	Group model
	CFO model (single and multi site)
	MSC Improvement Program
	Seaweed

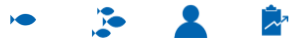
### 4.0 Structural requirements

No requirements additional to ISO 17065 and the MSC General Certification Requirements (GCR)

### 5.0 Eligibility requirements



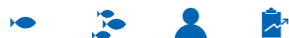
**5.1** The CAB shall assess that any organisation, including all associated site(s) and subcontractor(s), applying for or maintaining their certification to the MSC CoC Standard:



**5.1.1** Meet the MSC Forced and Child Labour Eligibility Requirements.



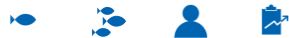
**5.1.2** Has not had a certificate suspended or have been suspended in the six (6) months before the date of application.



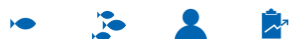
**5.1.3** Has not had a certificate withdrawn in the two (2) years before the application.



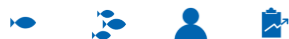
**5.1.4** Is not attempting to circumvent a previous suspension or withdrawal through reorganisation, change of legal entity or trade name, or separation from a multi-site certificate.



**5.1.5** Has not been subject to a criminal or civil penalty within the last two (2) years, where legal action has been taken against the organisation relating to the scope of certification including; fraudulent activities, such as forged documents or 'seafood fraud'.



**5.1.5.1** Where there is doubt, the CAB shall document its assessment and seek clarification from the Assurance Provider. MSC and/or ASC may be informed where relevant.



**5.1.6** Does not represent a reputational risk to MSC or

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ASC via association due to doubt about its transparency, impartiality or overall credibility.

**5.1.7** For ASC CoC certification, organisations shall not meet any of the ineligibility requirements listed in the ASC Supply Chain Module.



**5.2** Organisations (or sites) may become eligible for certification after a minimum period of two (2) years from the conclusion of the case provided by the organisation:

Has complied with all terms and conditions of the criminal sentence or civil penalty,

Provides sufficient evidence of an adequate root cause analysis and proven effective implementation of corrective actions sufficient to prevent recurrence.



**5.3** The CAB shall verify ongoing compliance with eligibility requirements at each audit, and at any other time where there is reason to question the organisation's continued eligibility.



**5.4** Enhanced fishery or farm operations that are out of scope of the MSC Fisheries, ASC Farm, ASC-MSC Seaweed (Algae), or Improvement Program Standards are ineligible for CoC certification.

## 6.0 Need for CoC certification



**6.1** CoC certification is required for any organisation that takes legal ownership of ASC or MSC certified (or Improvement program) seafood or seaweed and makes, or intends to make, a claim that the product is certified, except in the following circumstances:



**6.1.1** Organisations that only purchase and sell certified products in Consumer-Ready Tamper-Proof Packaging (CRTPP). The CAB shall use the decision tree in Figure 1 to verify whether products are in CRTPP.



**6.1.2** Organisations that receive certified product in CRTPP and open the packaging only for heating or plating before serving to the final consumer.



**6.1.3** Organisations that are explicitly identified as covered by the scope of a valid fishery certificate, ASC farm certificate, seaweed production certificate, or Improvement Product Eligibility Statement, and that operate under that certification.



**6.1.4** Product Received Before Point of First Sale: Organisations receiving product before the point of sale from the certified seaweed production/fishery's client group or certified farm must have CoC certification. The starting point for required certification is defined in the seaweed production/fishery's Public Certification Report or

## 7.0 Certificate validity and audit cycle

The MSC Chain of Custody certificate is valid for three (3) years. During the certificate validity period, the certificate holder shall be audited at regular intervals, normally every year, and in exceptional cases every 18 months, in accordance with this document.



7.1 The CAB will determine which CoC model the applicant qualifies for and, after consulting with the organisation, select the most suitable option (Table 1).

Table 1 Certification models

Certification model	Applicability
Default	Organisations operating from a single site, or multi sites under the same legal entity. Each site is audited.
Group	Organisations or group of legal entities operating under the control and responsibility of a central office (the certificate holder).
Consumer-Facing Organisation (CFO)	Organisation selling or serving certified seafood to final consumers. For multiple sites the organisation shall operate under a shared management system.

## 8.0 Application



8.1 The CAB shall require an authorised representative of the applicant organisation to provide information to establish:

The scope of certification.

Whether consultancy services relating to the management system to be certified has been provided and, if so, by whom.



8.2 The scope of certification shall be defined for each organisation and shall include the following elements:

**8.2.a** The standard(s) and/or other normative documents for which the organisation is seeking certification.

**8.2.b** The species (identified for each standard/model).

**8.2.c** The organisation's identity (Company ID), including trade name(s) and legally registered name(s).

**8.2.d** Physical location(s) of the organisation, including central office and all the sites (location ID).




**8.2.e** Contact personnel responsible for traceability and operations

**8.2.f** Activities (as listed in

Table 2)

**8.2.g** Any subcontracted activities and the details of the subcontractors

**8.2.h** Any change to the elements listed above shall be treated as a scope change and shall be assessed by the CAB prior to addition or removal from the certification scope.

8.3 The CAB shall review the application and supplementary information for certification to ensure:

**8.3.1** The applicant is eligible (as per Eligibility Criteria section);

**8.3.2** The information about the applicant organisation and its management system is sufficient to develop an audit plan;

**8.3.3** Any known difference in understanding between the CAB and the applicant organisation is resolved;

**8.3.4** The scope of certification, along with any other factors influencing the certification activity, are considered when estimating the time required to complete audits.

**8.4** When the CAB declines an application for certification, the reasons shall be recorded and provided to the applicant.

**8.5** A CAB shall not grant certification to an organisation that is already certified with another CAB.

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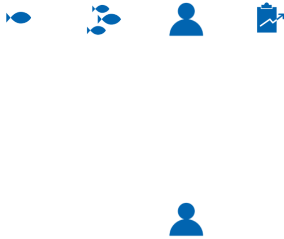
Table 2 Activities in the Chain of Custody Program

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	ASC Aquaculture			Only used for any entity involved in the farming of seaweed (Seaweed Production Categories Bi, Bii, Ci and Cii, as per ASC-MSC Seaweed Standard) 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.
	Packaging/re-packaging/ On board packaging			Applying, changing or adding labelled packaging while the product remains the same.  Onboard packaging refers to any packaging activity carried out on a fishing vessel during or after harvest, including placing certified products into retail-ready packaging, sealed containers, vacuum packs, or other consumer or wholesale packaging formats, and applying labels or traceability identifiers onboard the vessel.  note: it is not intended for facilities which are distributing discrete products without labels.
	Pre-processing/ On board pre-processing			Activities that maintain the quality of raw fish and prepare it for distribution or further processing without altering its original form. This includes tasks such as chilling, receiving, inspecting, weighing, grading, and sorting. It also involves measures to reduce contamination and spoilage, such as washing, cleaning, depuration, and conditioning.
	Processing/ On board processing			Modification of a product that results in an output different from the input. This activity includes: - Primary processing – the first time that seafood is changed from its original form as it was harvested (includes on-vessel processing). E.g: heading, gutting, filleting, trimming, de-scaling; removing bones or skin, washing, rinsing etc.  - Secondary processing – any subsequent change made after primary processing. E.g. breading, glazing, cooking, smoking, frying, portioning etc.  - Preservation – any modification to ensure the long-term conservation of the product. E.g. Examples are; freezing, storing on ice, salting, dehydrating, vacuum sealing.
	Retail (to consumer)			Sell directly to final consumers. This includes fresh fish counters at retailers, fishmongers, and markets selling directly to consumers.
	Restaurant/take-away to consumer			Preparation and service of food to final consumers in establishments such as restaurants, canteens, schools, hospitals, or catering enterprises.
	Storage/ On board storage			Holding products in a dedicated area before/after processing, before distributing and selling.
	Trading with physical possession			Purchasing and selling certified products without processing them. The product is stored or handled by the organisation.
	Trading without physical possession			Purchasing and selling certified products without processing them. The product is shipped directly from supplier to customer and does not reach the organisation directly. In both cases, the organisation takes legal ownership of the product.
	Transportation			Physical transfer of certified products using means controlled by the organisation. Includes at-sea transfer between vessels where applicable (transshipment).
	Use of subcontractor/ Use of at sea subcontractor			Outsourcing an activity in scope to a separate certified or non-certified organisation, that never takes legal ownership of the certified product. (CoC CR - When this activity is selected, the subcontractor shall be registered in SCAP, and the subcontracted activity shall also be specified and included in the certification scope.)
	Warehousing, distribution of finished products			Handle/distribute finished and packed products without any processing, repacking, or relabelling.

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	Warehousing, distribution of non-finished products			Handle/distribute non-finished products or ingredients without any processing, repacking, or relabelling.
	Wholesale			The sale of goods in large quantities, typically to retailers, businesses, or other entities rather than individual consumers.

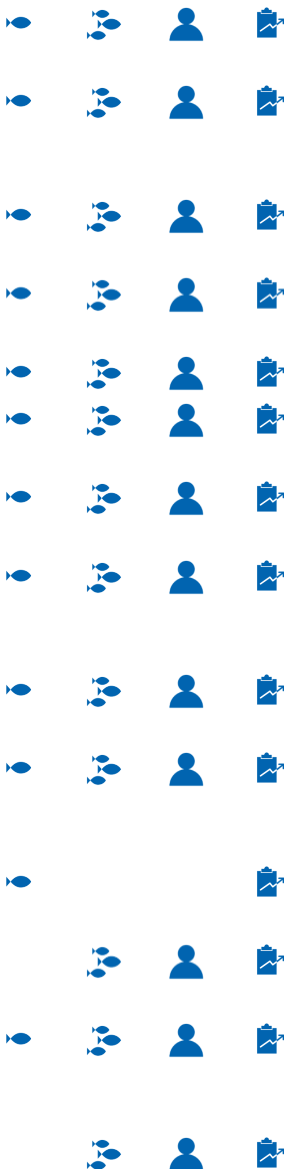
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## 9.0 Site lists








































































- 9.1** For organisations with more than one (1) site, the CAB shall be able to access an up-to-date site list that includes:  
The address and country code for each site (Site Location ID)  
Contact details for the responsible/contact person for each site
- 9.2** For CFO organisations, the list shall classify sites as consumer-facing sites, operations sites, or sites that carry out both types of activity.

## 10.0 Audit planning



- 10.1** The CAB shall have a system in place to accurately plan the audit.
- 10.2** The CAB shall establish the audit plan and, following discussion with the organisation, adjust it to reflect any changes in the certification scope.
- 10.2.1** The CAB shall determine and document the audit duration.
- 10.2.1.1** The audit duration shall be based on an evaluation that considers, at a minimum:
- 10.2.1.1.a** The scope of certification;
  - 10.2.1.1.b** The complexity of the organisation's operations and management system;
  - 10.2.1.1.c** The number of sites included within the scope;
  - 10.2.1.1.d** Activities requiring visits to temporary or additional locations, where applicable;
  - 10.2.1.1.e** Additional certification schemes audited as part of a combined audit.
- 10.2.1.2** Where additional information becomes available prior to, or during the audit, the CAB shall review and adjust the audit duration as necessary.
- 10.2.1.3** For the Default CoC certification model, all sites within scope shall be audited.
- 10.2.1.4** For Group and CFO CoC certification models, the audit shall include the central office.
- 10.2.1.5** The outcome of the MSC Risk Assessment shall inform site selection and audit duration.
- 10.2.1.6** Where stratification is applied (as per the MSC Risk Assessment), the CAB shall:

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				<b>10.2.1.6.a</b> Define the strata;
				<b>10.2.1.6.b</b> Document the rationale for stratification;
				<b>10.2.1.6.c</b> Record the stratification approach in SCAP; and
				<b>10.2.1.6.d</b> Conduct a risk assessment for each stratum prior to site selection.
				<b>10.2.1.7</b> Site selection shall ensure an accurate representation of the organisation as a whole. The CAB shall prioritise site selection based on:
				<b>10.2.1.7.a</b> The outcome of the risk assessment.
				<b>10.2.1.7.b</b> Requests from MSC, ASC, or Assurance Provider.
				<b>10.2.1.7.c</b> Sites that have not been audited within the previous year.
				<b>10.2.1.8</b> At least one (1) site, and no less than 25% of the selected sample, shall be selected at random.
				<b>10.2.2</b> The decision and rationale for the audit duration shall be recorded in the audit report.
				<b>10.3</b> The CAB shall review all proposed additions of sites to an existing CoC certificate and determine whether any audit activities are required prior to inclusion in the certificate.
				<b>10.4</b> The audit plan, including sites to be audited (unless otherwise specified), shall be communicated and the audit dates shall be agreed on with the organisation.
				<b>10.5</b> For short-notice site audits, the CAB shall inform the organisation in advance on the total number of sites but shall only disclose the specific sites to be audited no more than two (2) working days before the audit begins.
				<b>10.5.1</b> Where short-notice audits cannot be conducted at certain sites, the CAB shall select alternative sites where possible, demonstrating that overall audit remains representative of the scope.
				Any change in the site sample shall be documented in the audit report.
				<b>10.6</b> The CAB shall ensure that the same auditor conducts no more than four (4) consecutive audits (initial, surveillance, and/or recertification) for the same organisation or site.
				<b>10.6.1</b> With the exception of expedited audits requested by MSC or ASC, the auditor shall wait at least one (1) year or one (1) audit (initial, surveillance, or recertification) before auditing the same organisation again.

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**10.7** Audit due dates are determined by the original certification date. To allow reasonable scheduling flexibility:

**10.7.a** Surveillance audits may be conducted up to 90 days before or after the audit due date; and





































**10.7.b** Recertification audits shall be conducted up to 120 days before the certificate expiry date

**10.8** The recertification audit and certification decision shall be completed before the certificate expiry date. The recertification audit shall be planned to allow time for:

**10.8.a** The closure of any non-conformities raised

**10.8.b** The reissuance of the certificate prior to expiry to avoid a lapse in certification.

## 11.0 Unannounced audits

**11.1** The CAB shall carry out unannounced, on-site audits each year for a minimum of one (1) % of its total number of certificate holders, or one (1) certificate holder, whichever is greater.

**11.2** The CAB shall calculate the minimum number of unannounced audits required on an annual basis.

**11.3** The CAB shall prioritise certificate holders for unannounced audits based on the MSC Risk Assessment and shall additionally consider information provided by the MSC, ASC, the assurance provider, or any other relevant information known or received by the CAB.

**11.4** The CAB shall inform organisations of a surveillance window of up to 6 months during which an unannounced audit may occur; however, no advance notice shall be given of the actual audit date or if applicable the site(s) selected.

**11.4.1** Where a certificate holder conducts only seasonal production, the surveillance window for unannounced audits should be adjusted as appropriate to coincide with the production period.

**11.5** The CAB shall complete the risk assessment at audit planning stage.

**11.5.1** The CAB may at its discretion require additional sites to be audited.

**11.6** The auditor(s) shall audit non-certified storage subcontractors at least once during the organisation's three (3)-year certificate validity if the subcontractor is:

**11.6.1** Located in a country with a Transparency International CPI score below 41 ([cpi.transparency.org](http://cpi.transparency.org)), and

**11.6.2** Stores product that has been partially processed by the organisation but is not yet in the form in which it

will be sold.

## 12.0 Audit Methodology and frequency



To determine the appropriate audit type and methodology for each site included in the audit plan, the auditor shall evaluate the organisation on a site-by-site basis, taking into account the activities performed at each site. Based on this evaluation, the auditor shall select and conduct the audit accordingly within SCAP.



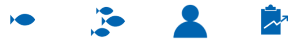
**12.1** All audits shall be conducted on site. However, the auditor(s) may select an alternative audit methodology, according to Table 3, where appropriate.



**12.2** To determine the applicable audit delivery options, as specified in Table 3, the auditor(s) shall categorise the organisation's sites (and their non-certified subcontractors) included in the audit plan, into one of the product activity categories listed below.



**12.2.a** No physical possession of certified products. The site only performs administrative activities.



**12.2.b** Physical possession of certified products in sealed containers or discrete units only. The site only receives products in sealed containers or discrete units and sells them without opening the individual units. The opening of outer packaging or shipping units containing individually packaged products is permitted as long as the packaging of the individual units remain unopened and unmodified.



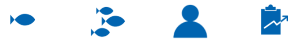
**12.2.c** Physical possession with alteration of packaging or certified products. The site undertakes an activity that alters the packaging or certified products.



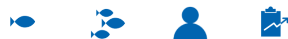
**12.3** The auditor(s) shall evaluate and document the feasibility of conducting a remote audit by reviewing:



**12.3.a** Whether the certificate holder had any major non-conformities raised at the previous audit and whether there have been any incidents relevant to the standard.











































**12.3.b** The communication technology to be used and its operational effectiveness, such as the ability to assess manufacturing processes and storage areas or interview personnel responsible for processes and/or procedures.



**12.3.c** The possible impact on audit planning and on the overall audit duration.



**12.3.d** Any other risk factors related to the integrity of the supply chain or to the effectiveness of the remote audit.

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**12.3.1** If, during the audit, the auditor identifies any factor that may compromise the effectiveness or integrity of the remote audit, the audit shall revert to an on-site audit.

**12.3.2** If, during the audit, unforeseen interruptions or issues delay the course of the audit, the auditor shall adjust the audit duration to compensate for the time lost.

**12.3.3** If, during the audit, communication technology fails to operate as intended compromising the audit integrity, or any other factor indicates that the overall audit effectiveness is impaired, the audit shall be suspended and rescheduled on-site.

**12.4** To carry out a hybrid audit, the auditor(s) shall ensure as a minimum that:

**12.4.a** All audit elements are evaluated across the combined remote and on-site audit activities.

**12.4.b** Any inconsistencies, gaps, or new information identified during the remote or on-site audit activities shall be re-evaluated.

**12.4.c** No more than 30 days elapse between the remote and the on-site components of the audit.

**12.4.1** Where hybrid audits are conducted by different auditors, there is a documented communication process in place.

**12.5** The CAB shall determine the audit frequency for Default CoC certificate holders after each certification decision.

**12.6** An 18-month surveillance audit frequency is possible for Default CoC certificate holders if:

**12.6.a** The CAB determines that the organisation is low risk according to the risk assessment, and

**12.6.b** The certificate holder meets one (1) of the following conditions:

**12.6.b.i** 100% of the seafood product handled at all sites is certified; or

**12.6.b.ii** The organisation only handles certified product in sealed boxes or containers and does not repack, process, or otherwise alter sealed boxes in any way.

**12.6.1** Where the CAB applies an 18-month surveillance audit frequency, the CAB shall record the rationale for this decision in the CoC audit report.

**12.6.2** Where a Default CoC certificate holder qualifies for both an 18-month surveillance frequency and remote or hybrid audit delivery, the CAB may apply either:

**12.6.2.a** An 18-month surveillance audit with on-

site or hybrid delivery; or

**12.6.2.b** An annual surveillance audit with remote or hybrid delivery.

The CAB shall record the justification for the selected option in the audit report.

## 13.0 Conducting audits



**13.1** The CAB shall have a process for conducting audits.

This process shall include an opening meeting at the start of the audit and a closing meeting at the conclusion of the audit.

The auditor(s) shall conduct audit evaluations using the SCAP and record all relevant audit information, findings, and outcomes on the SCAP in accordance with the SCAP Manual.



**13.2** Auditor(s) shall evaluate organisations against all relevant requirements of the CoC Standard in effect at the time of the audit during the initial, surveillance, and recertification audits.

## 14.0 Opening meeting



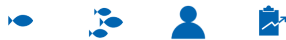
**14.1** All audits shall begin with an opening meeting, where auditor(s) shall confirm with the organisation all the following as a minimum:



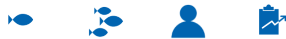
**14.1.1** Participant introductions and roles, including any observers.



**14.1.2** Confirmation of the scope of certification.



**14.1.3** Verification of eligibility.



**14.1.4** Review and confirmation of the audit plan.



**14.1.5** Confirmation of formal communication channels between the auditor(s) and the organisation.



**14.1.6** Confidentiality arrangements and how information will be managed.



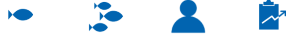
**14.1.7** The access required and the type of information needed.



**14.1.8** The method of reporting, including any grading of audit findings.



















































**14.1.9** Review of findings of the previous audit, if applicable.



**14.1.10** Opportunity for the organisation to ask questions.



**14.1.11** The auditor(s) and the organisation shall agree on a timeline for the provision of records required to complete record verification and traceability exercises.

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**14.1.12** The agreed timeline shall enable completion of the verification activities within the audit and shall be documented by the auditor(s).

**14.2** Obtaining and verifying information

**14.3** During the audit, information relevant to the audit objectives, scope and criteria shall be obtained and verified to become audit evidence.

**14.4** The auditor(s) shall review the list of certified suppliers, if applicable.

**14.5** The auditor(s) shall review records relating to the receipt, sale, and applicable activities involving physical possession of products included in the scope of certification at the audited site(s).

**14.6** If the organisation intends to sell product held in stock as certified before the initial audit, the auditor(s) shall verify that all the materials and products have been purchased from a certified supplier.

**14.7** When a certificate holder withdraws from certification and subsequently re-enters the programme, the audit shall be treated as an initial audit and the requirements applicable to initial audits shall apply.

**14.8** If the certificate holder uses any MSC and/or ASC label, MSC Improvement Program back-of-pack claim, or other trademarks on its own products or on behalf of another organisation, the auditor(s) shall verify that the following conditions are met:

**14.8.1** All products carrying the MSC and/or ASC label, or the MSC Improvement Program back-of-pack claim, are covered by a valid MSC I and/or ASC I Label Licence Agreement.

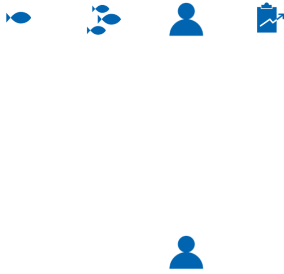
**14.8.2** The organisation can provide evidence of product approval from MSC I for a sample of products using the MSC and/or ASC label and/or the MSC Improvement Product back-of-pack statement, such as an MSC I product-approval email or other written confirmation.

**14.9** Where an organisation uses the MSC and/or ASC label or the MSC Improvement Product back-of-pack claim, the auditor(s) shall verify that the product composition, labelling, and approved statements are consistent with the applicable requirements of the MSC/ASC Label User Guide and/or the MSC Improvement Program Guidelines, including any applicable percentage thresholds for certified seafood ingredients.

**14.10** Evaluation of the management system. For each activity within the scope of certification, including any subcontracted activities, the auditor(s) shall evaluate whether

Def      Group      CFO      MSCIP      SW

the organisation's management system and operational controls conform to the applicable requirements of the Chain of Custody Standard.



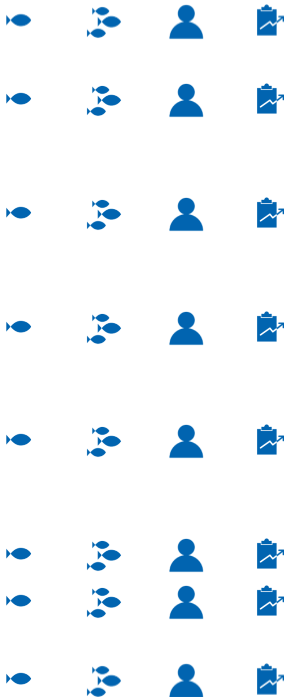
**Guidance 14.10** *This evaluation shall be conducted regardless of whether certified or Improvement products are physically present on-site at the time of the audit, as the assessment focuses on the effectiveness of the management system and controls rather than on active production or processing.*

**14.10.1** For CFO organisations with multiple sites, the auditor(s) shall cross-check evidence reviewed at the central office against procedures and activities observed at consumer-facing sites and operational sites, as applicable.

## 15.0 Auditing subcontractors

Where activities within the scope of certification are performed by subcontractors (certified or non-certified), auditors assess the controls established by the organisation to ensure compliance with the Standard. This includes confirming that subcontracted activities are identified, appropriately documented, and subject to formal agreements, and that the organisation retains full responsibility for all activities carried out on its behalf.

Where subcontractors hold certification, auditors review the relevance and validity of that certification in relation to the subcontracted activities.



**15.1** The auditor(s) shall check the list of all subcontractors (certified and non-certified) and subcontracted activities.

**15.2** The auditor(s) shall verify that the agreement between organisation and the subcontractor(s) (certified or non-certified) meets Section 15 of the Standard.

**15.3** The auditor(s) shall verify that the organisation retains full responsibility for all activities performed by subcontractors (certified or non-certified) on its behalf.














**15.4** Where the organisation intends to use certified subcontractors, the auditor(s) shall verify that the scope of the subcontractor's certification covers the relevant activities.

**15.5** If the organisation is a certified subcontractor, the list of certified organisations for which the organisation conducts activities related to certified products.

**15.6** During the audit the auditor(s) shall:

15.6.1 Verify that all applicable requirements in the CoC Standard have been met.

15.6.2 Conduct an on-site traceability test to verify that sampled certified products can be clearly identified as certified throughout the chain of custody. The test includes an input-output reconciliation to verify there is no substitution (as described in the Traceability and

Def	Group	CFO	MSCIP	SW
				
				
				
				

record verification exercise section).









**15.6.3** For initial audits, If the subcontractor is already handling product for the organisation (their client), the auditor shall verify certified product information to/from the organisation and subcontractor including; product ID, product form, and quantity per species (weight or volume).

**15.6.4** The auditor(s) shall raise all non-conformities, found at a non-certified subcontractor, against the organisation.

**15.7** Non-certified subcontractors performing processing or re-packing activities shall be audited prior to being used by the organisation for certified product, and thereafter at least annually.

**15.8** CoC CFO certified organisations shall only use certified subcontractors for processing activities.

## 16.0 Interviews





















			
			

**16.1** The auditor(s) shall interview personnel whose activities are relevant to the compliance with the CoC Standard to verify their competence in understanding and applying the applicable requirements. At least one (1) relevant individual shall be interviewed per site audited.

**16.2** The auditor(s) shall determine and justify the number and selection of interviewees based on the size and complexity of the organisation, the nature of operations, and the range of roles relevant to the CoC requirements.

The name and role of each interviewee shall be recorded on SCAP.

## 17.0 Segregation

**17.1** The auditor(s) shall establish that appropriate measures are taken by the organisation to identify and segregate between:

**17.1.1** Certified and non-certified seafood.

**17.1.2** Where relevant, between seafood certified to other recognised schemes sharing the CoC Standard (e.g. Improvement Program, ASC Supply Chain Module).

**17.1.3** For organisations processing MSC certified fish oil or fish meal:

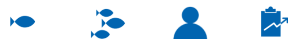
The auditor(s) shall review the validation, monitoring, and verification records to confirm that the segregation method is effectively applied.

**17.1.4** Where subcontractors are used, the auditor(s)

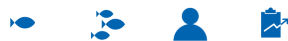
shall verify that appropriate systems are in place to ensure the identification and traceability of certified products at dispatch/sale and receipt/purchase to and from the subcontractor.

## 18.0 Traceability and record-verification exercises

The auditor(s) shall conduct these exercises using certified products on site at the time of the audit. If no certified products are available during the audit the auditor shall use: Comparable non-certified product to demonstrate the effective operation of the traceability system; Documented procedures and available records to verify that the traceability system is established and capable of effective implementation (applicable to initial audits of new certificate holders or newly added sites only that don't have any products at all on site).



**18.1** The CAB shall conduct and document record-verification exercises for certified products to confirm traceability and volume reconciliation within the scope of certification (including subcontractors).



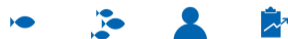
**18.2** The auditor shall verify that where products are sold as certified, each certified product is identifiable as certified at the line-item level on the related invoice or sales documentation (excluding sales to final consumers).



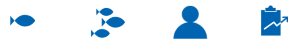
**18.3** For consumer-facing sites, products sold as certified at the point of sale or service can be traced back to a CoC certified supplier or to an internal dispatch/distribution site.



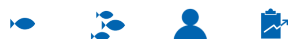
**18.4** For operations sites, certified product received is traceable through all internal transfers, storage, processing, transport, or subcontractor steps from the organisation's central office or distribution point to the site where it is sold or served.



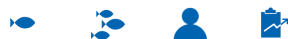
**18.5** The record-verification exercises shall include at a minimum:



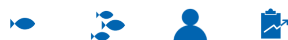
**18.5.a** Traceability tests on one (1) or more batches of product sold or ready for sale. The test shall be done during the audit and demonstrate the ability to trace certified product from input to output, or from output to input, using documented records that link purchase, receipt, internal movement, and sale or transfer.



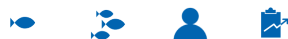
**18.5.a.1** The number and range of samples shall be sufficient to:























**18.5.a.1.a** Represent the range of traceability risks arising from different activities, species, product forms, and organisations.



**18.5.a.1.b** Include at least one (1) complete traceability test, unless the auditor(s) documents a justified reason why this is not practicable.



**18.5.b** Verification that purchase records for certified product are consistent with corresponding delivery and

Def	Group	CFO	MSCIP	SW
				
				
				
				
				

receipt records. Where feasible, records shall be cross-checked against the physical product on-site.

**18.5.c** Input/output reconciliation over a defined time period and/or for a defined batch of product to verify that quantities of certified product purchased are consistent with quantities sold. Where processing occurs, yield calculations shall be reviewed to determine whether they are reasonable and justified. Input/output reconciliation exercise shall be done during the audit.

**18.6** The auditor(s) shall be provided with the records requested as part of the record-verification exercises, according to the timing agreed in the opening meeting.

























**18.7** When suitable products are on site, the auditor(s) shall determine the number of samples or products to use for record verification exercises.

**18.8** The auditor(s) shall select samples independently and review them while on-site, or on the day of the remote audit.

**18.9** When requested by MSC, ASC or the assurance provider, the auditor(s) shall verify traceability records available at the audit.

## 19.0 Internal traceback exercise

Prior to the audit, certificate holders are required to conduct an internal traceback exercise using the MSC Traceback Template. This is to demonstrate that certified products can be traced through all relevant handling and processing steps (Critical Tracking Events, CTEs) within the scope of certification.

**19.1** The auditor(s) shall verify that the internal traceback:

**19.1.a** Was conducted before the audit.

**19.1.b** Was completed using MSC-provided template.

**19.1.c** Is conducted between each audit with different products (where possible).

**19.1.d** Includes all the relevant critical tracking events (CTEs).

**19.1.e** Includes all the associated key data elements (KDEs) which are appropriately recorded, using sampling methods and supporting evidence available.

## 20.0 Management of audit findings

			
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**20.1** The auditor(s) shall always raise a non-conformity or an observation whenever evidence, or lack thereof, demonstrates that an organisation has deviated from the requirements of the standard. The CAB shall record all audit findings on SCAP.

Def	Group	CFO	MSCIP	SW

## 20.2 Non-conformities

**20.1.1** If any findings are raised during the audit, the CAB shall send a summary listing all the findings to the organisation within 10 working days of the audit.

**20.3** All non-conformities raised at the previous audit shall be reviewed to verify corrective actions taken.

**20.4** Auditors shall categorise non-conformities as follows:

**20.4.a** Minor: A failure to comply with the CoC Standard that does not jeopardise the integrity of the Chain of Custody.

**20.4.b** Major: A failure to comply with the CoC Standard that has the potential to jeopardise the integrity of the Chain of Custody.

**20.5** All non-conformities shall be raised at central office level. Site-level corrective actions may be required where the non-conformity is site-specific.

The central office shall retain responsibility for ensuring closure of all non-conformities.

**20.6** The central office shall retain overall responsibility for the closure of all non-conformities, while ensuring that sites are held accountable for the implementation of required corrective actions. Where a site fails to effectively address a site-specific non-conformity, the central office may suspend that site to avoid the suspension of the entire CoC certificate.

**20.7** At the initial audit:

**20.7.1** All identified non-conformities, whether Minor or Major, shall be closed within 90 calendar days from the date when report is sent to the organisation.

**20.7.2** Failure to close any non-conformity within this timeframe shall result in the requirement for a new audit.

**20.8** At surveillance and recertification audits:

**20.8.1** Both Minor and Major non-conformities shall be closed within 30 calendar days from the date when report is sent to the organisation.

**20.8.1.1** Failure to close a Minor non-conformity within this timeframe shall result in its escalation to a Major non-conformity.

**20.8.1.2** Failure to close a Major non-conformity within this timeframe shall result in suspension.

**20.9** A certificate holder shall be suspended where two (2) sites or 25% of audited sites (whichever is greater) are found to have one (1) or more Major non-conformities.

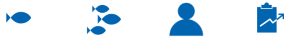
**20.9.1** Additionally for Group certifications with stratification, this threshold shall apply independently to

Def	Group	CFO	MSCIP	SW
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each stratum, based on:

**20.9.1.a** The number of audited sites within the stratum, and

**20.9.1.b** The number of sites with Major non-conformities identified within that stratum.



**20.10** To close a non-conformity, the auditor(s) shall verify that the organisation has:



**20.10.a** Implemented an immediate correction to address the identified non-conformity; and



**20.10.b** Provided objective evidence demonstrating that the correction has been effectively implemented.



**20.10.1** For Major non-conformities, the auditor(s) shall verify that the organisation has:



**20.10.1.a** Conducted and documented a root cause analysis; and



**20.10.1.b** Implemented corrective actions designed to prevent recurrence of the non-conformity, supported by objective evidence of effective implementation.



**20.11** The auditor(s) shall determine whether non-conformities may be closed through:



**20.11.a** Document review, or



**20.11.b** A follow-up audit (partial audit), where on-site verification is required.



**20.12** For all audits, the CAB shall not take a certification decision until all non-conformities, whether minor or major, have been effectively closed.



**20.12.1** Where the CAB's decision-making entity disagrees with the auditor's categorisation of non-conformities, the CAB shall record the rationale for those changes in SCAP.



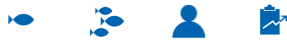
**20.13** Where the CAB receives evidence of an organisation's non-conformity with the CoC Standard outside of an audit, the CAB shall raise a non-conformity against the relevant CoC Standard clause and record it on SCAP.

Non-conformities raised outside audit shall be closed using the same approach and timelines of non-conformities raised during audits.

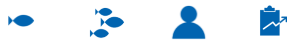
## 21.0 Closing meeting

The closing meeting provides an opportunity for the auditor(s) to summarise the audit findings, including any non-conformities, observations, or areas for improvement, and to discuss these with the organisation.

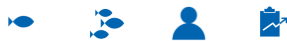
The format and number of closing meetings may vary depending on the organisation's structure, size, and complexity.



**21.1** The auditor(s) shall conduct a closing meeting at the conclusion of each audit with the organisation's representative(s) to present the audit results, including the following elements:



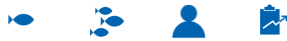
**21.1.1** Any findings or non-conformities that have been identified during the audit and their proposed categorisation (subject to approval by the CAB's decision-making entity).



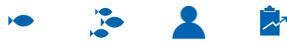
**21.1.2** Any corrective actions the organisation may have to complete and their timeframes before certification can be awarded.



**21.2** The organisation shall be given opportunity for questions. Any diverging opinions regarding the audit findings or conclusions between the auditor(s) and the organisation shall be discussed and resolved where possible. Any unresolved issues shall be recorded in the audit report and referred to the CAB's decision-making entity.



**21.4** The auditor(s) shall inform the organisation of its obligation to notify the CAB of any significant changes that may affect certification, as specified in the certification agreement.



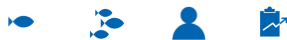
**21.3** The auditor(s) should inform the certificate holder that certification is not effective until they are listed as certified on the MSC and/or ASC website.

Until then, the organisation shall not represent itself as certified or make any claims relating to certification.

## 22.0 Incidents and Investigations



**22.1** CABs shall have specific procedures in place to conduct and document investigations whenever an incident is reported or identified. Procedures shall include:



















































**22.1.a** Formal acknowledgement of the incident and communication to the MSC within five (5) working days



**22.1.b** Gathering and verification of all necessary information to evaluate the incident



**22.1.c** Identification of actions to take and the most suitable tool to investigate, resolve, minimise the consequences, or close the incident within five (5)

Def	Group	CFO	MSCIP	SW
				
				
				
				
				
				
				
				
				
				
				
				

working days from the initial communication to the MSC

**22.1.d** Notifying the MSC about the outcome of the incident

**22.2** The CAB shall comply with any request from the MSC, ASC, or a designated agent to collect samples of certified products or products from certified sources or other substances for the purposes of DNA and/or other product authentication testing or verification of compliance

**22.3** If the MSC notifies the CAB of evidence indicating a potential incident involving one of its clients, the CAB shall evaluate the evidence and respond to the MSC within five (5) working days, specifying the actions to be taken.

**22.4** The CAB shall select from a range of available tools for managing incidents and shall evaluate and determine the appropriate measures on a case-by-case basis, taking into account the level of risk posed.

Available actions may include;

**22.4.1** Raising a non-conformity outside the audit and allowing the certificate holder to address it in accordance with the established non-conformity closure procedure;

**22.4.2** Suspending the certificate holder in the cases specified in the MSC General Certification Requirements (GCR);

**22.4.3** Arranging an expedited unannounced audit to verify the evidence;

**22.4.4** Implementing other actions the CAB considers appropriate for the specific situation.

**22.5** The MSC may request the CAB to conduct an expedited audit, as part of an investigation, by submitting a written request that includes any relevant information or evidence.

**22.5.1** The MSC and CAB shall agree in writing on the cost of the audit prior to the audit.

**22.5.2** The MSC may require that the audit be attended by a representative of the MSC or ASC, or the assurance provider.

**22.6** Where an incident has occurred, the CAB shall plan additional verification for the certificate holder at the following audit.

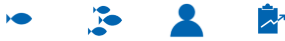
## 23.0 Certificate management for all CoC organisations

**23.1** An organisation can be certified or maintain certification when:

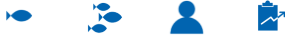
**23.2** The certification decision shall be finalised and communicated to the organisation within 30 days of the audit

Def      Group      CFO      MSCIP      SW



date.

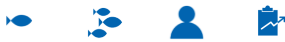
**23.3** If further evidence has been requested from the organisation to demonstrate that non-conformities were closed, the CAB shall make a certification decision within 30 days of receiving this evidence.



**23.4** The CAB shall send the final report to the organisation, and notify them that they have 10 days to review the document entirely and confirm that it is correct and that they accept it. Acceptance can be provided electronically or physically.



**23.5** Within 10 days of the certification decision the CAB shall ensure the organisation's certification status on SCAP is completed and up to date according to the SCAP manual.



**23.6** At re-certification, the new certificate shall be issued with an effective date corresponding to the expiry date of the previous certificate and an expiry date three (3) years from that date.

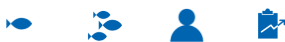


**23.6.1** Where an organisation seeks certification for MSC, ASC, Seaweed and/or Improvement Program certified products, the certification decision shall be made at the same time but separate certificates and certificate codes shall be issued for MSC, ASC, Seaweed and/or Improvement Program, although a single Chain of Custody audit report may be used.



**23.7** All CoC certificates shall have a maximum validity period of three (3) years, subject to continued compliance with certification requirements. The CAB and the organisation may agree to issue a certificate with a shorter validity period in order to align certification cycles or enable combined audits.

## 24.0 Changes to the scope of the certification



**24.1** The organisation shall inform their CAB in writing or by email within 10 days of the following changes:

**24.1.a** Change of CoC contact person.

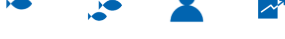
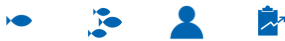
**24.1.b** Addition or removal of activities.

**24.1.c** Addition or removal of sites.

**24.1.d** Addition or removal of subcontractors.

**24.1.e** Addition or removal of suppliers.





































**24.1.f** Addition or removal of certified species.



**24.2** Where a subcontractor added to the scope is not certified, the subcontractor shall be subject to an audit in accordance with the certification requirements.



**24.3** On receipt of a request for a change to the scope of

Def	Group	CFO	MSCIP	SW
				
				
				
				
				
				
				
				
				
				
				
				
				
				
				
				
				
				

certification, the CAB shall:

**24.3.a** Determine whether the request change constitutes an extension or a reduction of scope.

**24.3.b** Evaluate the impact of the change on:

**24.3.b.i** The organisation's management system.

**24.3.b.ii** Traceability and segregation controls, and

**24.3.b.iii** Continued eligibility for certification under the applicable version of the CoC Standard.

**24.3.c** Decide whether an audit or follow-up audit is required before approving the change, and document the rationale for this decision.

**24.4** For CFO organisations adding sites, the CAB shall carry out an assessment, to determine if an audit is required, when notified that one or more of the following apply:

**24.4.1** The number of sites within a CFO certificate has increased by more than or equal to 25%

**24.4.2** The new operations site(s) is involved in processing, packing or repacking of certified product.

**24.4.3** The new site(s) operate(s) in a new country.

**24.5** For Group organisations adding (a) site(s), the CAB shall carry out an assessment before approving the addition of sites where one or more of the following apply:

**24.5.1** The number of proposed new sites exceeds 10% of the number of sites included in the certificate at the most recent audit.

**24.5.2** The proposed new sites conduct activities not already included in the group's certified CoC scope.



























**24.6** The CAB shall approve the proposed new sites, providing:

**24.6.1** There is objective evidence (such as an internal audit report) that the new sites comply with relevant sections of the Standard.

**24.6.2** Details required for the site list have been provided.

**24.6.3** The CAB is confident that the central office has the necessary resources to manage the increased workload.

**24.7** Where it is determined that the proposed new site(s) cannot be approved, the CAB shall not add the site(s) to the Group certificate until the central office has satisfactorily addressed the identified concerns. The CAB may audit the central office to verify the effective resolution of the identified concerns.

Def	Group	CFO	MSCIP	SW
				
				
				
				
				
				
				
				
				
				
				

**24.8** If an organisation is no longer eligible to be certified under the same version of the CoC Standard, the CAB shall inform the organisation they must be re-certified against the appropriate CoC Standard within 6 months.

**24.9** Once the CAB has assessed the request relating to the certificate scope and determined the required course of action, the CAB shall notify the organisation of outcome within 10 days from receiving request.

Where no audit is required as part of the certificate scope change, the CAB shall issue the updated certificate and update SCAP.

**24.10** The CAB shall update SCAP within 10 days of a certificate lapse or a reported change to an organisation's certification scope.

**24.11** The CAB shall have a documented procedure to determine when it should do any of the following:

**24.11.1** Conduct expedited audits and record this on SCAP

**24.11.2** During expedited audits, the auditor(s) may set shorter timeframes for document provision. Where legally permissible, expedited audits should be prioritised even if the responsible/contact person is unavailable.

**24.11.3** Request and examine documentation related to an organisation's operations.

**24.12** The CAB's procedure shall take account of information received including:

**24.12.1** Complaints.

**24.12.2** Notification of changes in personnel, site or management system procedures.

**24.12.3** Information from the MSC, ASC, the assurance provider and/or MSC/ASC.

**Table 3 Remote auditing options.**

Product handling category	Alteration of packaging / seafood (Includes direct handling of seafood )			Only handle certified seafood in sealed containers (Box in box out )			No physical possession / handling of seafood (Includes the Central office function)			Vessels		
	Onsite	Hybrid	Remote	Onsite	Hybrid	Remote	Onsite	Hybrid	Remote	Onsite	Hybrid	Remote
Initial & Recertification Audits	✓	x	x	✓	✓	x	✓	✓	✓	✓	✓	x
Surveillance Audit	✓	✓	x	✓	✓	✓	✓	✓	✓	✓	✓	✓
Subcontractor Audits (non-certified)	✓	x	x	✓	✓	x	✓	✓	✓	✓	✓	x
Follow up Audits	✓	✓	x	✓	✓	x	✓	✓	✓	✓	✓	x
Scope Extension (Where an audit is undertaken)	✓	✓	x	✓	✓	✓	✓	✓	✓	✓	✓	x
Expedited Audits	✓	x	x	✓	x	x	✓	x	x	✓	✓	x
Verification Audits	✓	x	x	✓	x	x	✓	x	x	✓	✓	x

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Group  
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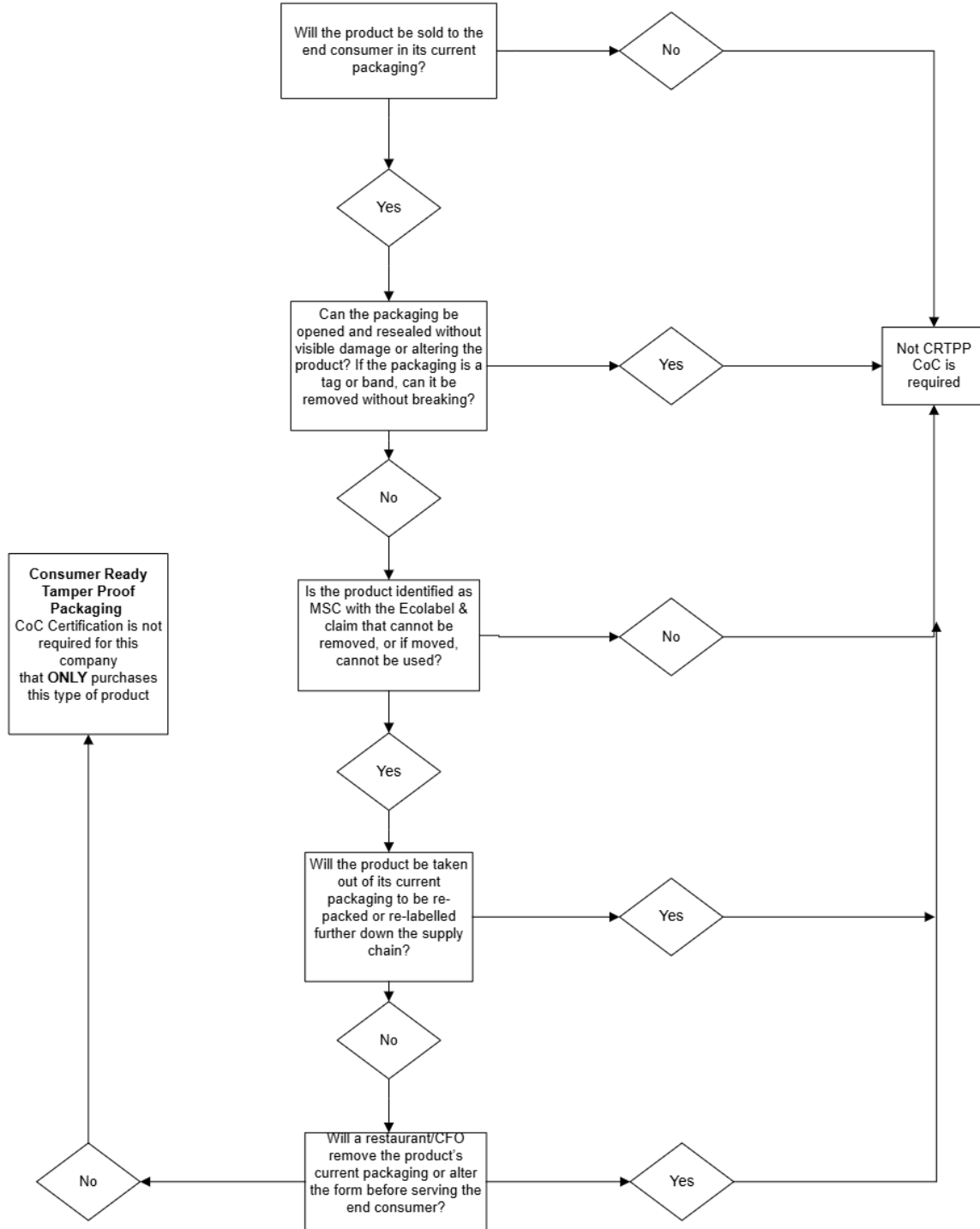


Figure 1 CRTPP Decision tree

## Risk assessment – MSC CoC Program

MSC have revised the Risk Assessment – this one risk assessment is now applicable to all models of the CoC program (Default, Group and CFO). This will feature as a standalone document to support with the audit planning process.

The proposed risk assessment is detailed in the table below along with an assessment against the current risk assessment. To view the current risk assessment, please review the CoC Certification Requirements v3.2 (Section 7.2 Table 5 for CFO model and Section 10.4 Table 13 for Group model).

<b>Risk Factor / Risk Assessment Question</b>	<b>Response Options</b>	<b>Revision mapping – current risk assessment (CoC CR v3.2 vs proposed risk assessment)</b>
Scope Activity conducted by the company	Multiple selection: <ul style="list-style-type: none"> <li>• Processing</li> <li>• Packing or repacking</li> <li>• Retail to consumer</li> <li>• Storage</li> <li>• Transportation</li> <li>• Transshipment</li> <li>• Use of Subcontractor</li> <li>• Pre-Processing</li> <li>• Catering</li> <li>• Wholesale</li> <li>• Warehousing/Distribution of finished products (box-in, box-out)</li> <li>• Trading</li> </ul>	<b>Question</b> – No change <b>Response Options</b> – Activities have been revised in line with the modification to Table 4 in the CoC CR
Mislabelling or substitution associated with the handling of similar products	Select one <ul style="list-style-type: none"> <li>• Similar products are handled on site.</li> <li>• Dissimilar are products handled on site.</li> <li>• No other seafood onsite</li> <li>• No seafood is handled onsite</li> </ul>	<b>Question</b> – Change from “similar species” to “similar products” <b>Response Options</b> – Options have been expanded beyond certification status of species with a shift in focus towards whether products could be substituted.
Number of species in the scope of the certificate holder	Select one <ul style="list-style-type: none"> <li>• 11+</li> <li>• 6 – 10</li> <li>• 2 – 5</li> <li>• 1</li> </ul>	<b>Question</b> – No change <b>Response Options</b> – Expansion from a binary 1/more than 1 species as found within the CFO risk assessment.

Risk Factor / Risk Assessment Question	Response Options	Revision mapping – current risk assessment (CoC CR v3.2 vs proposed risk assessment)
Structure of internal management system	Select one <ul style="list-style-type: none"> <li>• Each site manages the processes that take place independent of a central office/management structure.</li> <li>• The central office manages some of the processes that take place on each site, but sites have some level of independence.</li> <li>• The central office has complete management of the processes that take place on each site.</li> <li>• The certificate holder is comprised of a single site</li> </ul>	<b>Question</b> – New – consolidation of current questions pertaining to specific processes (control of ecolabel application, ownership of sites, procurement of products). <b>Response Options</b> – New
Presence of Short-term/Seasonal Staff	Select one <ul style="list-style-type: none"> <li>• Over 75% of the workforce is seasonal/temporary staff which increases the likelihood of mislabelling/substitution to occur.</li> <li>• Between 25% and 75% of the workforce is seasonal/temporary staff which somewhat increases the likelihood of mislabelling/substitution to occur.</li> <li>• Less than 25% of the workforce is seasonal/temporary staff which is less likely to impact the likelihood of mislabelling/substitution to occur.</li> <li>• 0 seasonal/temporary staff</li> </ul>	<b>Question</b> – New <b>Response Options</b> – New
Digital record keeping	Select one <ul style="list-style-type: none"> <li>• The organisation maintains paper-based records only. There is an increased likelihood of human error to occur, affecting the effectiveness of the organisation's traceability system.</li> <li>• The organisation maintains a mixture of paper-based and digital records. Human error is possible but likelihood is reduced.</li> <li>• The organisation maintains digital records only. Minimal likelihood of human error.</li> </ul>	<b>Question</b> – Expansion of current CFO Risk Assessment question focusing on electronic systems that allow reconciliation of all products sold to final consumers. <b>Response Options</b> – Expansion of options to allow mixtures of systems to be used, not just solely digital or analogue.
Number of sites included under the certificate	Select one <ul style="list-style-type: none"> <li>• 100+</li> <li>• 11 - 99</li> <li>• 2 - 10</li> <li>• 1</li> </ul>	<b>Question</b> – No change <b>Response Options</b> – Expansion, not just “1-2 sites” or “3 or more sites”
Have there been any major non-conformities or suspensions issued, or an	Select one <ul style="list-style-type: none"> <li>• Certificate has been suspended (entire certificate or site) or organisation has been identified as part of an MSC incident.</li> </ul>	<b>Question</b> – No change <b>Response Options</b> – Expansion from “1 or more major non-conformity” to include

Risk Factor / Risk Assessment Question	Response Options	Revision mapping – current risk assessment (CoC CR v3.2 vs proposed risk assessment)
MSC incident raised within the last 18 months?	<ul style="list-style-type: none"> <li>• Yes, at least 1 critical non-conformity or more than 3 major non-conformities.</li> <li>• Yes, 1-3 major non-conformities.</li> <li>• No major non-conformities.</li> <li>• No non-conformities</li> </ul>	inclusion of minor non-conformities and more severe issues (suspension and MSC incidents).
Does the certificate holder have listed sites that conduct scope activity/activities at sea?	Select one <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> </ul>	<b>Question</b> – New <b>Response Options</b> – New
Country of operation score on Transparency International's latest corruption perception index (for latest scores see <a href="http://cpi.transparency.org">cpi.transparency.org</a> ). For organisations that have sites in multiple countries, use the lowest CPI score from the latest year.	Select one <ul style="list-style-type: none"> <li>• Under 32</li> <li>• Between 32 and 62 inclusive</li> <li>• Above 62</li> </ul>	<b>Question</b> – No change <b>Response Options</b> – No change
The organisation carries out internal audits at least annually	Select one <ul style="list-style-type: none"> <li>• No internal audits are required to take place.</li> <li>• Internal audits take place, however audits or internal control systems are not operational and corrective, or preventative actions are inappropriate.</li> <li>• Internal audits take place. These include testing the traceability of certified seafood and the organisation can demonstrate that internal auditors are competent in carrying out internal audits.</li> </ul>	<b>Question</b> – No change <b>Response Options</b> – Language has been included to mirror the current requirements found in CoC CR 10.6 to allow for mitigation measures that actively reduce risk level.
The organisation holds other 3rd-party accredited certifications	Select one <ul style="list-style-type: none"> <li>• No other 3rd-party accredited certifications.</li> <li>• Yes - other 3rd-party accredited scheme not otherwise identified.</li> <li>• Yes - ISO 9001/ISO 22000/GFSI-recognised standard.</li> </ul>	<b>Question</b> – No change <b>Response Options</b> – Expansion to include “other 3 <sup>rd</sup> party accredited scheme” that may not account for traceability in the same way as ISO 9001/ISO 22000/GFSI-recognised schemes, but show active participation in other schemes.

## **Certification Requirements: Risk Assessment and Stratification**

The risk assessment supports the determination of the number and selection of sites to be audited. Where applicable, sites may be categorised into strata comprising sites with similar (for example) activities, risk characteristics, or location, so that site selection captures a representative sample of the certificate holder's operations.

Stratification ensures that sampling and audit coverage are proportionate to risk and representative of the certification scope. Non-certified subcontractors are counted as sites and may also be selected for sampling.

- For Default certificate holders, stratification does not apply and all sites shall be audited.
- For Group certificate holders, multiple strata may be defined based on differences in site activities or risk.
- For Consumer-Facing Organisation (CFO) certificate holders, strata may include operations sites and consumer-facing sites.

Where stratification is applied, the CAB defines the strata and conducts a risk assessment for each stratum prior to selecting sites for audit.

### **Group Certificate Holders (Stratified Sampling)**

Where stratification is applied, the CAB shall:

- Define the strata;
- Document the stratification decision and rationale; and
- Complete a risk assessment for each stratum prior to site selection.

When selecting sites for audit, priority shall be given to:

- Sites identified for sampling by the MSC or its assurance provider;
- Sites that were not audited in the previous audit cycle.
- Sites conducting business-to-business processing or repacking of certified products;

### **Consumer-Facing Organisation (CFO) Certificate Holders**

The CAB shall complete a risk assessment for each stratum (operations sites and consumer-facing sites) prior to site selection.

Def  
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CFO  
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Where a site performs both consumer-facing and operations activities, it shall be counted as one site for sampling purposes.

When selecting sites for audit, priority shall be given to

- Sites identified for sampling by the MSC or its assurance provider;
- Sites that were not audited in the previous audit cycle.
- Sites conducting business-to-business processing or repacking of certified products;
- Additional constraints affecting the feasibility of short-notice audits.

**Table x – CoC Auditor Qualification Table – General Certification Requirements**

Proposed changes to the CoC auditor qualification table can be found below. Information was previously spread across two documents – in the CoC Certification Requirements and the General Certification Requirements (GCR) documents. The proposal is for this table to be located in the GCR only.

<b>Role</b>	<b>Section</b>	<b>Qualification and experience</b>	<b>Competences</b>	<b>Verification</b>
<b>AUDITOR</b>	1. Work experience	<p>a. five (5) years' work experience, including two (2) years in the food industry, supply chain management, science, traceability, or policy development,</p> <p>OR</p> <p>b. Degree or equivalent in business, economics, science or technical programme plus three (3) years' work experience including two (2) years' work experience in supply chain management, science, traceability or policy development.</p>	<p>a. Demonstrate understanding of supply chain dynamics, traceability systems, and risk assessment, AND</p> <p>b. Knowledge of national and international laws related to traceability, AND</p> <p>c. Ability to assess seafood supply chains and apply relevant standards across diverse contexts.</p>	<p>a. CV, AND</p> <p>b. Employer references, AND</p> <p>c. Degree, certificates/diplomas</p>

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Role	Section	Qualification and experience	Competences	Verification
<b>AUDITOR</b>	2. Third-party auditing techniques (qualification)	<p>a. Pass an online or in-person auditing course by an approved trainer (e.g. CQI/IRCA or Exemplar Global-recognised lead assessor) based on ISO 19011, covering key auditing principles and practices,</p> <p>OR</p> <p>b. Obtain certification through any recognised auditing, quality management, or industry-specific training program (e.g., Environmental Management Systems, Quality Management Systems, Global Food Safety Initiative) that includes a practical auditing component.</p>	<p>a. Apply auditing principles systematically to CoC audits, AND</p> <p>b. Assess evidence for accuracy and relevance, AND</p> <p>c. Identify risks affecting audit reliability, AND</p> <p>d. Lead audit teams and compile compliant reports, AND</p> <p>e. Adapt auditing techniques, including remote and hybrid auditing, to various supply chain contexts.</p>	<p>a. Certificate of training completion.</p> <p>b. Witness audits by MSC-appointed accreditation body.</p> <p>c. CAB records and observations.</p>

Role	Section	Qualification and experience	Competences	Verification
<b>AUDITOR</b>	3. MSC training	a. Pass MSC CoC Auditor training before conducting an audit.	a. Understand CoC requirements, eligibility criteria, and steps in an audit, AND b. Assess traceability risks and evaluate mitigation strategies, AND c. Conduct remote and on-site audits, AND d. Grade non-conformities appropriately and apply Food Fraud Prevention guidelines, AND e. Extract relevant data from MSC databases.	a. Online training completion and exam results. b. Witness audits or CAB evaluation records. c. Stakeholder feedback.  Guidance: As per ISO 17021, the documented monitoring procedures for auditors shall include a combination of on-site observation, review of audit reports and feedback from clients. This monitoring shall be designed in such a way as to minimise disturbance to the normal processes of certification. <b>(Table 1 CoC CR)</b>
<b>AUDITOR</b>	4. Auditing Experience	a. Observe at least two (2) on-site CoC audits.  AND  b. Lead at least two (2) audits under on-site supervision of a qualified auditor.	a. Plan and execute audits effectively, AND b. Detect document discrepancies and/or fraudulent practices, AND c. Communicate findings clearly to stakeholders, AND d. Apply MSC audit principles to maintain traceability and integrity of supply chains, AND e. Ability to conduct a combination of on-site observation, review of audit reports and feedback from clients.	a. CAB records. b. Audit reports. c. Feedback from clients or stakeholders. d. Witness audits by accreditation bodies.

Def  
Group  
CFO  
MSCIP  
SW



Role	Section	Qualification and experience	Competences	Verification
<b>AUDITOR</b>	5. Maintaining MSC CoC qualifications	<p>a. Undertake four (4) on-site MSC CoC audits or audits for equivalent standards (from CoC CR section 4.a) during the last calendar year.</p> <p>and</p> <p>b. Be peer witnessed by a qualified CoC lead auditor during an MSC CoC audit or an audit for equivalent standards that include a significant component of traceability.</p> <p style="padding-left: 20px;">i. This must be done at least once in each three (3)-year period where the peer witness may be part of the audit team.</p> <p>AND</p> <p>c. Pass or complete mandatory MSC's auditor training on updates to the CoC program documents prior to undertaking audits against any new requirements.</p> <p>AND</p> <p>d. Retake and pass the MSC's CoC online exam on the MSC learning portal at least once every three (3) years.</p> <p style="padding-left: 20px;">i. Failing to successfully pass the exam would require repeating the relevant online training module(s) before reattempting the exam.</p>	<p>In addition to section 2 and 3:</p> <p>a. Demonstrate consistent application of certification principles, AND</p> <p>b. Assess group traceability and reporting systems, AND</p> <p>c. Evaluate risk and compliance across different certificate holders.</p>	<p>a. MSC Exam results</p> <p>b. CAB records.</p> <p>c. Witness or office audits by an MSC-appointed accreditation body and/or assurance provider.</p> <p>d. CAB on-site observations, review of audit reports and feedback from clients.</p> <p>e. Previous audit reports.</p>

Role	Section	Qualification and experience	Competences	Verification
<b>Additional requirements for CFO auditors</b>	6. MSC training	<p>a. Prior to conducting MSC CoC CFO audits, pass the MSC's CoC CFO online training,</p> <p>AND</p> <p>b. Prior to taking a seafood sample, complete the seafood sampling training on the MSC training platform.</p>	<p>a. Determine sample sizes for consumer-facing audits, AND</p> <p>b. Conduct risk-based sampling and validate client assessments, AND</p> <p>c. Evaluate mitigation strategies in the CFO context, AND</p> <p>d. Understand requirements of the CFO CoC standard.</p>	<p>a. Training certificates.</p> <p>b. Witness audits.</p> <p>c. CAB evaluations.</p> <p>d. Sampling methodology validation.</p>
<b>Additional requirements for CFO auditors</b>	7. Auditing Experience	<p>a. Observe or participate in at least one (1) on-site CFO audit.</p> <p>AND</p> <p>b. Lead at least one (1) CFO audits under on-site supervision of a qualified auditor.</p>	<p>In addition to section 2 and 3,</p> <p>a. Apply CFO-specific auditing techniques, AND</p> <p>b. Maintain consistency in sampling and reporting practices, AND</p> <p>c. Monitor updates to CFO CoC requirements.</p>	<p>a. Exam results.</p> <p>b. Witness audits.</p> <p>c. CAB feedback and client validation records.</p>
<b>Additional requirements for Group Auditors</b>	8. MSC training	<p>a. Prior to conducting MSC CoC group audits, pass the MSC's Group CoC auditor training course,</p> <p>AND</p> <p>b. Pass the MSC's online training on updates to CoC Group Standard and/or applicable requirements prior to undertaking group audits against the new requirements.</p>	<p>a. Determine sample sizes for Group audits, AND</p> <p>b. Conduct risk-based sampling and validate client assessments, AND</p> <p>c. Evaluate mitigation strategies in the Group context, AND</p> <p>d. Understand requirements of the Group CoC standard, AND</p> <p>e. Assess management structure and associated responsibilities of the Group manager.</p>	<p>a. Training certificates.</p> <p>b. Witness audits.</p> <p>c. CAB evaluations.</p> <p>d. Sampling methodology validation.</p>

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Group  
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Role	Section	Qualification and experience	Competences	Verification
<p><b>Additional requirements for Group Auditors</b></p>	<p>9. Auditing Experience</p>	<p>Prior to undertaking solo CoC Group audits:</p> <p>a. 20 MSC CoC audits or equivalent standards</p> <p>AND</p> <p>b. Witness or participate in one (1) MSC CoC Group audit or group audit for equivalent (comparable? similar?) standard under the direction and guidance of a Group CoC central office auditor</p> <p>AND</p> <p>c. Have led at least one (1) CoC Group audit for MSC or equivalent standards under the direction, guidance and supervision of an MSC group central office audit.</p>	<p>a. Understand group certification standards, AND</p> <p>b. Conduct effective group site audits and sampling, AND</p> <p>c. Apply management system principles to group audits, AND</p> <p>d. Demonstrate detailed knowledge of group traceability requirements.</p>	<p>a. CV.</p> <p>b. Witness audits.</p> <p>c. Audit reports.</p> <p>d. CAB observations and feedback records.</p>

Role	Section	Qualification and experience	Competences	Verification
<b>Additional requirements for Group Auditors</b>	10. Maintenance of qualification	<p>a. Retake and pass the MSC's CoC online exam on the MSC learning portal at least once every three (3) years.</p> <p>i. Failing to pass the exam would require repeating the relevant online training module(s) before reattempting the exam.</p> <p>AND</p> <p>b. Either lead or participate in one (1) MSC CoC Group audit or group audit for equivalent standards in the last 18 months.</p>	<p>a. Demonstrate consistent application of group certification principles, AND</p> <p>b. Assess group traceability and reporting systems, AND</p> <p>c. Evaluate risk and compliance across group members.</p>	<p>a. Exam results.</p> <p>b. Witness audits.</p> <p>c. CAB records and feedback from clients.</p>
<b>Additional requirements for Decision makers</b>	11. Maintaining MSC CoC qualifications	<p>a. Must meet all auditor qualification criteria for the respective certification scope, except for actively auditing (section 5.d and e).</p> <p>AND</p> <p>b. Carry out at least four (4) certificate decisions in a calendar year.</p>	<p>a. Evaluate non-conformities and recommendations from audit teams, AND</p> <p>b. Monitor personnel performance, AND</p> <p>c. Ensure MSC platform use compliance, AND</p> <p>d. Assess evidence critically for certification decisions.</p> <p>a. Review and apply updates to CoC standards, AND</p> <p>b. Maintain consistency in certification decisions, AND</p> <p>c. Monitor and support auditor performance, AND</p> <p>d. Identify ongoing training needs for audit teams.</p>	<p>a. Evaluation forms</p> <p>b. Report reviews</p> <p>c. CAB records</p> <p>d. Exam results.</p> <p>e. Decision logs.</p> <p>f. Feedback on certification outcomes.</p>