






# CoC Standard Requirements

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### CoC Models are noted with symbols

	Default model (single and multi site)
	Group model
	CFO model (single and multi site)
	MSC Improvement Program
	Seaweed

## 1.0 Scope of the MSC Chain of Custody certification

The Chain of Custody (CoC) certification applies to organisations that take legal possession of certified products and wish to make claims that these products originate from certified fisheries and can be traced throughout the supply chain back to a verified source. The scope of certification defines the products, sites, species, and activities under which products may be handled and sold as certified under the organisation's CoC certificate.

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### 1.1 The scope of certification includes:

- 1.1.a The applicable standard(s) and/or normative documents,
- 1.1.b The species covered under each applicable standard or model,
- 1.1.c The organisation's identity [Organisation ID] including legally registered name(s) and trade name(s),
- 1.1.d The activities conducted (e.g. processing, storage etc).
- 1.1.e All physical locations [Location ID] included within the certification scope, including the central office and all sites,
- 1.1.f Contact personnel responsible for traceability and operational compliance,
- 1.1.g The identity of subcontractors [Organisation ID] and subcontracted activities.

















































            

**Guidance 1.1** *To meet new traceability requirements, a standardised form of information (or Key Data Elements) is required to define certification scope:*

- \* Species - scientific name OR FAO 3-alpha code
- \* Organisation ID (Entity/Facility ID) - legal/registered name of company or business
- \* Location ID - Physical location and/or postal address + country code

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## 2.0 CoC certification eligibility

				<b>2.1</b> Any organisation, including associated site(s) and subcontractor(s), applying for or maintaining their certification to the MSC CoC Standard shall:
				<b>2.1.a</b> Meet the MSC Forced and Child Labour Eligibility Requirements
				<b>2.1.b</b> Not hold a CoC certificate that is suspended, nor have had any certificate suspended in the six (6) months before the date of application;
				<b>2.1.c</b> Not have had any certificate withdrawn within the two (2) years preceding the date of application;
				<b>2.1.d</b> Not have attempted to circumvent a previous suspension or withdrawal through reorganisation, change of legal entity or trade name, or separation from a multi-site certificate
				<b>2.1.e</b> Not have been subject to a criminal conviction or civil penalty related to activities within the scope of certification, including cases involving fraud, false or misleading statements, or falsification of documents, within the previous two (2) years.
				<b>2.1.f</b> Does not represent a reputational risk to MSC or ASC via association due to doubt about its transparency, impartiality or overall credibility.
				<b>2.1.g</b> For ASC CoC certification, organisations shall meet the ineligibility requirements listed in the ASC Supply Chain Module.
				<b>2.2</b> An organisation may be eligible for certification no earlier than two (2) years after the conclusion of the legal case, provided that the organisation:
				<b>2.2a</b> Has complied with all applicable legal decisions, penalties, or conditions, and
				<b>2.2b</b> Can demonstrate that the root cause(s) of the non-compliance have been identified and appropriate corrective actions implemented to prevent recurrence.
				<b>2.3</b> The organisation shall ensure that eligibility is maintained at all times, on application and while certified.

### 3.0 Management System

Management systems include the policies, procedures, and processes an organisation uses to ensure compliance with this Standard.

#### 3.1 General requirements



**3.1.1** The organisation shall establish, implement and operate a management system that effectively addresses and ensures compliance with all applicable requirements of this Standard.

**Guidance 3.1.1** *Written documentation is required for all models but scope will vary depending on the organisation's size and the nature and complexity of its activities.*



**3.1.1a** The Default and CFO management system shall cover all sites within the defined scope of the certification.



**3.1.1b** Individual Group sites may establish and maintain site-specific management systems.



**3.1.2** The organisation shall establish and maintain a management system to ensure that issues which may affect compliance with this Standard or the integrity of certified products, is communicated to the CAB and other relevant parties within five (5) calendar days.



**3.1.3** The organisation shall respond to written requests from the MSC, assurance provider, or the CAB for information or documentation within five (5) calendar days of receipt, unless otherwise specified.



**3.1.4** The organisation shall establish, maintain and retain records that demonstrate compliance with the applicable standard requirements for a minimum period of either: the current and the previous cycle of certification, one year after the products' expiry date, or as per legal requirements, whichever is longer.














**3.1.5** The organisation shall designate a representative from senior management who has overall responsibility and authority for the effectiveness of the organisation's management system and compliance with this Standard.



























**3.1.6** The organisation shall appoint a "CoC contact person" or "Group/CFO responsible person", and document and communicate their name, position, and contact details to the CAB.

The CoC contact person or Group/CFO responsible person:

**3.1.6.a** Shall be responsible for all communication with the CAB and for responding to requests for information or documentation related to compliance with this Standard.

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					<p><b>3.1.6.b</b> Shall have oversight and overall accountability for ensuring that all Group sites comply with this Standard.</p>
					<p><b>3.1.7</b> The central office has a signed agreement with each of the sites that specifies that the site shall comply with the applicable sections of this Standard.</p>
					<p><b>3.1.8</b> Each site under the scope of the certification shall:</p>
					<p><b>3.1.8.a</b> Authorise the central office to apply for and administer certification on behalf of the site.</p>
					<p><b>3.1.8.b</b> Agree to allow the group responsible person, representatives of the central office, the CAB, and the scheme assurance provider to access their premises and records relating to products within the scope of the CoC Standard.</p>
					<p><b>3.1.8.c</b> Adhere with decisions made by the group responsible person, the CAB, and the MSC's accreditation body, including issuing of non-conformities and implementing corrective action requests.</p>
					<p><b>3.1.8.d</b> Agree to supply the group responsible person with up-to-date contact details (e.g. name, position, email, phone number).</p>
					<p><b>3.1.8.e</b> Assign a site responsible person for ensuring compliance with the requirements of this Standard.</p>
					<p><b>3.1.8.f</b> Respond effectively to all requests from the central office, group responsible person or CAB, this includes training, documented information or audit requests</p>
					<p><b>3.1.8.g</b> Inform the central office of any changes that may impact compliance to the requirements of this Standard e.g. change of scope or assigned representative responsible.</p>
					<p><b>3.1.8.h</b> Maintain records relating to certified products in accordance with the requirements in Principle 4 (Certified products are traceable and volumes are recorded).</p>
					<p><b>3.1.8.i</b> Address corrective actions issued within their designated timeframes.</p>

### 3.2 Site list and adding new sites

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**3.2.1** An organisation operating multiple sites shall maintain a list of all sites within the scope of CoC certification, including the following details:

**3.2.1.a** Location ID: The physical and/or postal address for each site included in the scope of certification.

**3.2.1.b** Date of joining and, where applicable, leaving the certificate.

**3.2.1.c** Activities carried out, as defined in Table 1, and species handled.

**3.2.1.d** Contact information (name, position, and email or phone) for a responsible person for each site who ensures that the site complies with this Standard.

**3.2.2** The group responsible person shall:

**3.2.2.a** Provide the CAB with an up-to-date site register before each audit.

**3.2.2.b** Keep the site register up-to-date.

**3.2.2.c** Notify the CAB within 10 days of any sites being added or removed, by sending the CAB details about changes to the site register (as per 3.2.1).

**3.2.2.d** Ensure that written consent from the CAB is obtained before new sites are added.

**3.2.3** When new sites are added, the group responsible person shall provide the CAB with evidence that the central office has the capacity to manage the additional responsibilities associated with the new sites.

### 3.3 Internal Audits

Internal audits are an integral part of a management system and used to verify that the system is being implemented and maintained effectively.



**3.3.1** The audits shall evaluate whether the management system operates as intended and whether the Chain of Custody requirements are fulfilled.



Internal audits shall therefore include an assessment of compliance with applicable standard requirements.



**3.3.2** The organisation shall establish, implement, and maintain an internal audit program to ensure the management system addresses the applicable requirements of this Standard and audits the system at planned intervals.



**3.3.3** The internal audit program shall define the scope, frequency, audit methods, responsibilities, and

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the requirements for planning and preparing each audit. The audit program shall ensure that all relevant processes, activities, and requirements of the management system are systematically evaluated.

**3.3.4** The organisation shall ensure that internal audits are conducted by competent auditors. Competence shall be determined based on appropriate knowledge, training, skills, and experience relevant to the management system and the applicable MSC CoC standard requirements.

**3.3.5** The organisation shall be responsible for ensuring and demonstrating the competence of auditors, regardless of their employment status, and shall maintain documented information demonstrating auditor competence.

**3.3.6** Auditors may be internal staff or external individuals. To ensure objectivity and impartiality, auditor(s) shall be independent of the activities they audit and shall not audit their own work or activities for which they are directly responsible.

**3.3.7** A group organisation shall conduct an on-site internal audit at each site prior to the initial CoC certification audit to verify compliance with this Standard.

**3.3.8** An on-site internal audit is not required for sites that:

**3.3.8.a** Exclusively deal with certified seafood, and/or

**3.3.8.b** Exclusively conduct trading activities (as defined in Table 1). These sites do not physically handle certified products but may use certified subcontractors for transport and storage.

**3.3.8.c** Exclusively receive and store certified products in sealed containers that are not opened or altered at the site.
















**3.3.9** After initial certification, the internal auditor shall conduct an audit of all certified sites at least annually to verify continued compliance with applicable requirements of this Standard, except for sites that:

**3.3.9.a** Exclusively receive and store certified products in sealed containers that are not opened or altered at the site or exclusively handle certified seafood.

**3.3.9.b** Have undergone a CAB audit within the previous year.

**3.3.10** For new sites added to the group certificate, the first internal audit may be conducted during the next scheduled internal audit cycle.

**3.3.11** Before adding a new site to the certificate, the

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group responsible person shall verify that any new site is able to comply with the applicable requirements of this Standard through an onsite internal audit, excluding sites that:

**3.3.11.1** Operate under a system managed by the central office that defines the management and control of certified products and establishes the traceability systems and operational procedures in place.

**3.3.12** If it is found that a site is not in compliance with the applicable requirements of this Standard, the internal auditor or group responsible person shall:

**3.3.12.a** Document the non-conformity and corrective actions issued.

**3.3.12.b** Ensure corrective actions have been fully implemented and closed within the following timeframes

**3.3.12.b.i** Maximum four (4) days for any non-conformities where non-certified product has been sold as certified.

**3.3.12.b.ii** Maximum 30 days for any non-conformities which could lead to a risk of non-certified product being sold or labelled as certified.

**3.3.12.b.iii** Maximum 90 days for all other non-conformities.

**3.3.13** Where the site does not complete the corrective actions within the designated timeframe, the site shall be suspended from the group certificate until the corrective actions are implemented.

**3.3.14** If non-conforming product is found during an internal audit, the organisation shall follow the process for managing non-conforming products as per P 5.2.

**3.3.15** The organisation shall verify that all corrective actions resulting from internal audits have been completed and are effective. This verification shall take place prior to the initial CAB certification audit and prior to the addition of any new site to the group certificate.

















































**3.3.16** The organisation shall retain internal audit reports and CAB audit reports for a minimum of three (3) years from the date the report is issued.

**3.3.17** Internal audit reports shall include as a minimum the audit date, the internal auditor name, and non-conformities and corrective actions.

**3.3.18** Internal audit reports and records of corrective actions shall be made available to the CAB on request.

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### 3.4 Training

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**3.4.3** The organisation shall provide training for all relevant staff and ensure they are competent to ensure compliance with the relevant standard.

Training shall be provided:

**3.4.3.a** Before the initial certification audit

**3.4.3.b** As part of the induction process for new staff.

**3.4.3.c** At least annually after certification has been granted.

**3.4.3.d** Within 10 working days prior to label application where there is a delay of several months between certification and the application of any MSC or ASC labels onto products (refresher training).

**3.4.3.e** Whenever revisions to this Standard introduce changes relevant to staff responsibilities (re-training).

**3.4.4** The organisation shall establish, implement and maintain a system to ensure that relevant staff at all sites are competent to implement the management system and ensure compliance with the requirements of this Standard. The system shall define and document, at a minimum:

**3.4.4.a** The staff and/or roles at each site requiring training;

**3.4.4.b** The frequency and location of training;

**3.4.4.c** The scope of the training;

**3.4.4.d** The method for evaluating and demonstrating staff competence.

**3.4.5** The organisation shall ensure that training records are maintained and available to CABs and auditors on request.

### 3.5 Group review

The internal group review is intended to ensure that the group's policies and procedures are functioning well and that all sites continue to comply with this Standard. Records can be reviewed for each site individually or for the entire group and can be done by staff at the site level or central office.



**3.5.1** The group responsible person shall, at least annually, review a representative sample of records showing the total volumes of certified products purchased and sold across all sites within the scope of the group certificate (excluding volumes sold to final consumers) and verify that certified sales do not exceed certified purchases.

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**3.5.1.1** Any sites handling certified seafood exclusively can be excluded from the review.

**3.5.1.2** Sites that handle, sell, or serve certified seafood exclusively to final consumers are not required to record sales volumes. For these sites, the group review only needs to include an annual review of certified product purchases.

**Guidance 3.5.1** *A record review for all sites is required to ensure that certified sales do not exceed certified purchases. Records can be reviewed for each site individually or for the entire group and can be done by staff at the site level or central office. Because the CAB audits only a sample of sites within a group certificate, the central office (group responsible person) is responsible for reviewing volume records for all sites.*

**3.5.2** The organisation shall complete an annual internal group review to assess the effectiveness of the group management system and verify compliance with this Standard.

**3.5.3** The group responsible person shall review site-level problems or non-conformities to determine whether changes to the group management system are needed.

**5.3.4** The internal group review shall include, at a minimum:

**3.5.4.a** An assessment of the organisation's ability to comply with this Standard;

**3.5.4.b** Identification of systemic or recurring site-level non-conformities; and

**3.5.4.c** Proposed improvements to management systems to address root cause(s) of identified issues.

**3.5.4.d** A review of any complaints received regarding certified products or conformity with this Standard, and the actions taken in response.

**3.5.4.e** The organisation shall maintain records demonstrating that the internal group review has been completed.

### 3.6 Reporting Changes








































**3.6.1** The organisation shall inform the CAB, in writing or by email within 10 calendar days of any of the following changes:

**3.6.1.1** New CoC contact person or group/CFO responsible person within the organisation.

**3.6.1.2** Receipt of certified products from:

A new certified supplier, fishery, or farm; and

For Improvement Program organisations, a new MSC Improvement Program supplier or fishery

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(including where an existing supplier extends their scope to MSC Improvement Products).

**3.6.1.3** Receipt of a new certified species, including MSC Improvement Program species where applicable.

**3.6.2** The organisation shall obtain written approval from their CAB before implementing any of the following changes:

**3.6.2.1** Undertaking a new activity with certified product that is not included in the current scope of certification.

**3.6.2.2** Extending the scope of CoC to products certified against different recognised certification schemes that share the CoC Standard.

**3.6.2.3** Using a new subcontractor that performs processing and/or repacking of certified products.

**3.6.2.4** Adding any operations sites that are involved in processing or repacking of certified products.

**3.6.2.5** Adding, removing, or changing a site address, site name, or company name.

**3.6.2.6** Adding a site operating in a new country.













**3.6.2.7** For organisations with multiple sites:

**3.6.2.7.a** For CFO organisations, an increase in the total number of sites of more than or equal to 25% since the previous audit;

**3.6.2.7.b** For Group certification, an increase of more than 10% in the total number of sites.

**3.6.2.8** Where a change requiring CAB approval is proposed, the CAB shall determine whether additional audits are needed before granting approval.
















### 3.7 Subcontractors

**3.7.1** The subcontractor has adequate systems in place to ensure identification, segregation, and traceability of certified products at every stage in the supply chain.

**3.7.2** The organisation shall be able to demonstrate that all subcontractors handling certified product comply with the applicable requirements of this Standard.

**3.7.2.1** The organisation shall have a signed agreement with all subcontractors, including those with their own CoC certification, that transform, process, or repack certified products.

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The agreement shall cover the following:

**3.7.2.1.b** The organisation shall ensure that subcontractors allow the CAB, the MSC, or their designated agents access to the premises, certified products, and associated records on request.

**3.7.2.2** The organisation shall maintain an up-to-date record of the names and addresses and activities of all subcontractors, excluding transport organisations.

**3.7.3** The organisation shall ensure that any subcontractors that do not have their own CoC certification, and perform processing or repacking activities, is subject to an on-site audit to verify compliance with this Standard before beginning work and at least annually thereafter.

**3.7.4** Certified subcontractors shall record the name and CoC code of all certificate holders for whom processing activities have been provided since the previous audit.





























**3.7.5** The CFO organisation shall only use subcontractors that process or repack certified products if the subcontractor has a valid CoC certificate.

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## Principle 1 - Certified products are purchased from certified suppliers

Certified organisations purchasing product directly from a certified fishery or farm - a *group of certificate holders that are effectively the first actor in the CoC supply chain* - have a pivotal role to enable and facilitate fishery or farm-level traceability data / KDEs being available to the rest of the supply chain.

To meet the proposed requirements, these organisations may need additional time and/or support to find all the applicable fishery (or farm) level KDEs. Fishery-level and farm-level Key Data Elements (KDEs) include the MSC Fishery Unit of Certification (UoC), MSC Fishery Certificate ID, MSC Chain of Custody (CoC) code, and ASC Certification ID.

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**P 1.1** The organisation shall have a process in place to verify that all products identified and bought as certified are purchased exclusively from certified suppliers with a valid CoC/Fishery or Farm certificate.

**P 1.2** Where the organisation purchases products directly from a fishery, farm, or an MSC Improvement Program fishery (i.e. acts as a first buyer), the purchasing process shall include verification of the following relevant KDEs:

**P 1.2.1** Verification that the fishery, or farm holds a valid fishery or farm certificate applicable to the product being purchased.

**P 1.2.2** Verification of the product's eligibility to be sold as certified by the fishery or farm.

**Guidance P 1.2.2** *Not all products originating from a certified farm or fishery are necessarily eligible to be sold as certified. Where products do not meet the eligibility requirements of the applicable farm or fishery standard, they shall be treated as non-certified products for the purposes of Chain of Custody, even if they originate from a certified operation.*

**P 1.2.3** Verification that the fishery is operating legally and holds valid fishing permits or licences for the area and species fished and that no supplying vessel is listed on an Illegal, Unreported and Unregulated (IUU) list published by a Regional Management Fisheries Organisation (RFMO), national, or international IUU list.

**Guidance P 1.2.3** *Verification may be based on documentation provided by suppliers, information published by competent authorities, or other reliable sources of information such as catch certificates, certificates of origin; catch documentation schemes; vessel registries; vessel monitoring system etc.. First buyer KDEs include the following:*

- vessel KDEs: vessel ID (name & UVI/IMO/RFMO No.); Vessel flag ID (home port, registration No.);

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- *catch KDEs: valid fishing permits/licence No. & validating authority; quantity caught (per species); dates & Location ID (catch area - by species), gear type;*
- *Transshipment/receiving vessel ID; authorisation (declaration/licence No.) & validating authority; quantity per species; dates & Location ID;*
- *Landing – authorization No. & validating authority, quantity per species; date & Location ID.*



**P 1.3** The organisation shall cooperate with all requests from the CAB, assurance provider, MSC/ASC and/or designated agents for traceability documents or sales and purchase records of certified products and MSC Improvement Products.



**P 1.4** The organisation shall verify that the product being purchased as MSC Improvement Product is included in a valid MSC Improvement Program Product Eligibility Statement.



**P 1.5** The organisation shall verify the point at which CoC certification starts (as stated in the MSC Improvement Program Fishery CoC Eligibility Statement) to confirm there is no gap in CoC certification coverage.



**P 1.6** The organisation purchasing MSC Improvement products shall verify key data elements that confirm their eligibility, including species identification (scientific name or FAO alpha code) and confirmation of the applicable MSC Improvement Program Unit of Assessment.











**P 1.7** Organisations with certified products in stock at the time of the initial certification audit shall be able to demonstrate that these products were purchased from a certified supplier, fishery or farm, and comply with all relevant sections of this Standard before they can be sold as certified.

## Principle 2 - Certified products are identifiable

Organisations must ensure that certified products are clearly identified from the beginning of the chain of custody through to their final sale and distribution. This identification can be achieved using methods such as the MSC or ASC acronym, the Chain of Custody (CoC) code, or internal product identifiers like item numbers, SKUs, GTINs, or UPCs. These identifiers may be included in either physical or digital records, as long as the certified status is clearly and unambiguously indicated.

Requirements relating to label use, licensing, and trademark restrictions also apply where MSC or ASC labels are applied.

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**P 2.1** Certified products shall be identified as certified at relevant events in the supply chain: wild capture, transshipment, landing, farm harvest, storage, labelling, processing, packing, purchase/receipt and sale/distribution.

**P 2.1.1** Where it is not possible to physically label products, the organisation shall demonstrate how the products are linked to e.g. traceability or inventory records that specify their certified status.



**P 2.2** For organisations handling seaweed, certified products shall also include the product identification category throughout the supply chain.



**Guidance P 2.2** *The product identification category depends on the seaweed production category and is assigned in the seaweed production Public Consultation Report.*



**P 2.3** For organisations with seaweed in scope, the relevant invoice line item shall include the applicable production identification category.































**P 2.4** The organisation shall identify MSC Improvement Products on the physical product as well as on the accompanying traceability records.



**Guidance P 2.4** *MSC Improvement Program back-of-pack product statement may only be made on fish and fish products that are eligible to be sold as MSC Improvement Product, as determined by a CAB and supported by an MSC Improvement Product Eligibility Statement.*

*Organisations may use various methods to identify MSC Improvement Products, including the MSC Improvement Program code (IMP), or another internal system of identification. However, acronyms already used to identify fully certified products (e.g. MSC) cannot be used.*

*Non-consumer-facing, business-to-business use of the MSC Improvement Program code for traceability purposes does not require a separate label license agreement or MSC I approval (see 2.4).*

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**P 2.5** Where products are sold as certified, each certified product shall be identifiable as certified at the line-item level on the related invoice or sales documentation (excluding sales to final consumers).

**P 2.5.1** The following information shall be included for each certified line item:

**P 2.5.1.a** The applicable MSC or ASC Chain of Custody certification code;

**P 2.5.1.b** The species identification (scientific name or FAO alpha code);

**P 2.5.1.c** A product ID (e.g. item number, SKU, UPC, or GTIN); and

**P 2.5.1.d** A linking key data element (KDE), such as batch number, lot number, serial number, or container number, that enables traceability to related records.

**Guidance P 2.5** *The purpose of identifying certified line items on invoices is to support traceability and volume-reconciliation activities (see Principle 4). Organisations shall present this information in a standardised format, with each certified line item clearly distinguished and linked to the required key data elements (e.g., batch/lot or other traceability codes).*

*The organisation may identify MSC Improvement Products on the invoice line item in various ways, such as using the MSC Improvement Program code (IMP) or a unique product code that corresponds to an MSC Improvement Product and has been communicated to customers. If all items on an invoice are MSC Improvement Product, without other scheme categories (e.g. MSC or ASC certified, non-certified), the organisation may use MSC Improvement Product identification at the top of the invoice only.*

		
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**P 2.6** The organisation shall operate a system that ensures packaging, labels, menus, and other materials identifying products as certified are used exclusively for certified products, in accordance with the MSC/ASC Label User Guide.
























		
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**P 2.7** Certified products shall be labelled according to the MSC/ASC Label User Guide.

a. Species of the certified product and shall be in compliance with relevant legislative requirements;

b. Where stated, catch area and/or origin, shall be correct, complete, and comply with relevant legislative requirements.

Use of species names, catch area, or origin information that does not comply with applicable legislation shall be considered non-conforming product.

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**P 2.8** The organisation shall promote products as certified or use the MSC/ASC label or other trademarks, only where authorised under a valid label licence agreement.

Mixed recipe products containing MSC Improvement Product shall not be promoted as certified.

Certificate holders with seaweed in scope shall hold a separate Seaweed Partnership Agreement. Certificate holders with seaweed in scope shall hold a separate Seaweed Partnership Agreement.

**P 2.9** The use of acronyms (e.g., 'MSC' or 'ASC') or the full name of the standard owner (e.g., 'Marine Stewardship Council' or 'Aquaculture Stewardship Council') on products or traceability records without a label licence agreement is permitted exclusively in a business-to-business context. It shall not involve the use of the MSC or ASC label or any other trademarks.

**P 2.10** During an audit, the organisation shall provide evidence of trademark approval, including approval emails or other written confirmation issued by MSCI.

**P 2.11** The licence holder shall ensure that, where another organisation applies the MSC or ASC label on its behalf, a written agreement is in place with that organisation covering the specific product(s) and label use.

**P 2.12** The organisation shall not use the MSC label or trademark on MSC Improvement Products.

**P 2.13** The organisation (central office) shall have a system in place to ensure that any sites that are cancelled, suspended, or withdrawn from the certificate cannot continue to use the MSC or ASC label or other trademarks.

**P 2.14** When sites are suspended or withdrawn from the certificate, the central office shall have a documented process or procedure to ensure the relevant site(s) and MSCI are notified, and the relevant site(s) ceases all use of the MSC or ASC label and other trademarks, including on packaging, menus, and promotional materials.

**P 2.15** The group/CFO responsible person shall ensure that all sites using the MSC or ASC label or other trademarks are covered by a valid label licence agreement.

**Guidance P 2.15** *Two (2) label licence agreement types can exist: 1) One (1) label licence agreement with the central office covering all sites, or 2) Each site (or group of sites) may have their own label licence agreement with MSCI.*

## Principle 3 - Certified products are segregated

Certified products need to be kept physically separate from non-certified products at all times to prevent substitution and mixing. By implementing appropriate controls during storage, handling, processing, and transportation, organisations can maintain product integrity and traceability of certified products.

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**P 3.1** Certified products shall be effectively segregated from non-certified products at all times to prevent substitution and mixing, except where otherwise specified in this section.

**Guidance P 3.1** Organisations may use tools such as annual volume reconciliations to help verify that certified products have not been substituted with non-certified products. For example, comparing the volumes of certified products purchased or produced with the volumes sold can support this verification.



**P 3.2** MSC Improvement Products shall not be mixed or substituted with certified or non-certified products, except where permitted in P 3.3.1.



**Guidance P 3.2** Substitution includes selling a product as MSC Improvement Product when it is not eligible to be sold as such. Only products confirmed as eligible by a CAB and listed in an MSC Improvement Product Eligibility Statement may be sold as MSC Improvement Product.

*This requirement also supports the prohibition on mixing MSC Improvement Products with certified or non-certified products, except where used as an ingredient in accordance with P 3.3.1.*

**P 3.3** Certified and non-certified products shall be segregated if the organisation wishes to make a claim about these certified products, except:

**P 3.3.1** If non-certified seafood or MSC Improvement Product is used as an ingredient in products containing MSC and/or ASC certified ingredients, the resulting product shall follow the non-MSC/ASC certified seafood ingredients rules as per the MSC/ASC Label User Guide.












**P 3.3.2** MSC Improvement Product and MSC certified products shall not be mixed where the organisation intends to sell the products as MSC Improvement Product.

**P 3.4** Products certified against different recognised certification schemes that share the CoC Standard shall be segregated where the organisation intends to sell the products as certified, unless one of the following applies:


**P 3.4.1** The Certificate Holder has received specific

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written permission from MSC; or

**Guidance P 3.4.1** MSCI may approve a product with ingredients certified to different schemes (e.g. MSC and ASC) that may then be co-labelled (e.g. include the MSC and ASC label on pack) and have the different ingredients identified to the scheme they are certified to (e.g. MSC salmon, ASC shrimp). Further labelling rules are found in the MSC Label User Guide.

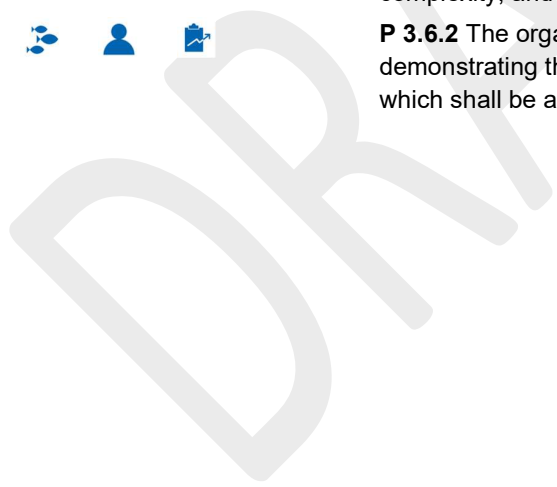
**P 3.4.2** The same product holds valid certification against more than one recognised certification scheme that shares the CoC Standard.

 **P 3.5** Certified seaweed products from different seaweed production categories shall be segregated, except: If products from different seaweed production categories are intentionally mixed, and the resulting product is identified using the ASC-MSC product identification category.

**P 3.6** For organisations processing MSC-certified fish oil and/or fish meal, there shall be a documented process to reduce the likelihood of contamination with non-certified product at the batch level.

**P 3.6.1** The process shall be appropriate to the organisation's operations, taking into account the size, complexity, and type of products processed.




































**P 3.6.2** The organisation shall maintain records demonstrating the implementation of the process, which shall be available for verification.



## Principle 4 - Certified products are traceable and volumes are recorded

Organisations are required to maintain complete and accurate traceability records that allow certified products to be traced backward to the certified supplier and forward to the point of sale or serving. These records must enable verification of product flows, support input–output reconciliation, and demonstrate access to all required Key Data Elements (KDEs) across relevant critical tracking events (CTEs) e.g., receipt, processing, storage, repacking, dispatch.

Traceback exercises rely on these records to demonstrate the effectiveness of the traceability system and confirm the integrity of certified product claims. Where subcontractors process certified products on behalf of the organisation, traceability requirements extend to those activities, and the organisation remains responsible for maintaining or obtaining the necessary KDEs.

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**P 4.1** The organisation shall provide all records required for traceability and record verification exercises within the required timeline as prescribed by the auditor. The organisation shall ensure that records are complete, accurate, protected from unauthorised alteration, and accessible to allow verification activities to be completed within the audit.

**P 4.1.1** 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 4.2** The organisation shall operate a traceability system that enables any product or batch sold as certified to be traced back to the certified supplier (for mid-supply chain organisations) or, for organisations at the end of the supply chain such as restaurants or fishmongers, to the corresponding receiving documentation or sales invoice.

**Guidance P 4.2** *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 for any handling that occurs before final sale.*













































**P 4.3** Products identified as certified at the point of receipt shall be traceable from the point of purchase through to the point of sale or serving.

**P 4.4** Traceability records shall link certified products at applicable critical tracking events (CTE) between purchase and sale and/or serving

**P 4.5** For offshore activities, traceability records shall link certified products at every stage between the fishing event and first point of sale, including harvest, pre-processing, processing, packing, storage, transshipment, landing, transport, and auction.

**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 for all certified products it processes, and for any certified products processed on its behalf by

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subcontractors. These records shall include the following key data elements:

**P 4.7.1** Product IN: Product ID and form; quantity received/bought (per MSC-certified species).

**P 4.7.2** Product OUT: Product ID and form; quantity shipped/dispatched/sold (per MSC-certified species).

**P 4.7.3** Dates of receipt and dispatch/shipping.

**Guidance P 4.7** *KDEs need to be available to CABs on request and linked to the relevant certified product batch or lot.*

*Examples include:*

- *Input/purchasing KDEs: supplier CoC code; species; product form; batch number/lot number; quantity received; date received;*
- *Output/sales KDEs: invoice number; SKU/GTIN; species; batch/lot/serial/container number; date dispatched; quantity shipped; and*
- *Processing KDEs: production batch; input/output linkage; dates of processing; conversion rates; output quantity;*
- *Storage KDEs: warehouse location ID; internal batch ID; date moved; date stored;*
- *Subcontractor KDEs: subcontractor batch records; subcontractor input/output data; processing dates.*

**P 4.8** For any processing or repacking activities, the organisation shall maintain records that enable the calculation of conversion rates between certified inputs and certified outputs for each relevant batch or defined time period.

**P 4.8.1** Conversion rates applied to the processing of certified products shall be justifiable and accurate.

**Guidance P 4.8.1** *To verify cases where conversion rates are potentially allowing room for mislabelled product, the CAB may check records against product specifications, similar products being processed, or the organisation's historical processing records.*









**P 4.9** The organisation shall exclusively identify and sell as certified, the products that are covered by its scope of certification.

**P 4.10** The organisation shall conduct an internal traceback exercise on a certified product or ingredient within its scope at least once between CAB audits, and whenever changes are made to the traceability system.

**P 4.11** Where multiple MSC-certified products, ingredients, or sites are included within the scope of certification, the internal traceback exercise shall select a different certified product, ingredient and/or site for each internal traceback exercise.

**P 4.12** For the internal traceback exercise, the organisation shall trace the certified product or ingredient through all relevant critical tracking events (CTE), including those conducted by certified and non-certified subcontractors, from point of sale back to the receiving event.

**Guidance P 4.12** *CTEs associated with transfer or transformation include the following events: fishing/catch, transshipment, landing,*

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*receiving, processing, and shipping.*

**P 4.13** The organisation shall complete the internal traceback exercise using the MSC-provided template ensuring that all KDEs are accurately recorded for each applicable CTE.

**P 4.14** The internal traceback exercise shall be completed prior to each audit and made available, with all supporting evidence, for review by the auditor(s).

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## Principle 5 - CoC Program Assurance

The integrity of certified products relies on the organisation's ability to identify, control and manage non-conformities and other incidents by responding appropriately in a timely manner to suspension or withdrawal of certification. Organisations shall ensure that issues affecting conformity with this Standard or the certified status of products are promptly contained, investigated, corrected and communicated to relevant stakeholders to protect the credibility of MSC's CoC certification and prevent recurrence.

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**P 5.1** The organisation shall not sell non-conforming product(s) as certified product(s).

**P 5.2** The organisation shall have a documented process for managing non-conforming products that includes the following requirements, at a minimum:

**P 5.2.1** Immediately cease to sell any non-conforming product as certified until the certified status has been verified and confirmed in writing by the CAB.

**P 5.2.2** Notify the CAB in writing within two (2) working days of detecting the non-conforming product and provide the CAB with all necessary information to verify the origin of the non-conforming product.

**P 5.2.3** Identify the reason the product is non-conforming and implement measures to prevent re-occurrence.

**P 5.2.4** Where non-conforming products cannot be verified as originating/purchased from a certified source/company, the products shall be re-labelled, repacked, or otherwise controlled to ensure they are not identified or sold as certified.

**P 5.2.5** Where non-conforming products have already been sold or shipped as certified, the organisation shall notify all affected customers (excluding final consumers) within four (4) calendar days of detecting the issue.

**P 5.2.5.1** The notification shall include the circumstances of the non-conformity and full details of the affected products or batches.



























































**P 5.2.5.2** Records of notifications shall be maintained in accordance with the retention requirements as per 3.1.6.

**P 5.3** Products ineligible to be sold as MSC-certified (such as in line with the Fisheries Certification Process FCP) shall be treated as non-conforming product.

**P 5.4** An organisation shall address and close all non-conformities raised during or outside the audit, to be certified or maintain certification.

**P 5.5** Timeframes for closing non-conformities shall begin on the date the organisation is formally notified of the non-conformity by the CAB, whether during an audit or outside of an audit.

**P 5.5.a** Where a minor or major non-conformity is raised at an initial audit, the organisation shall close the non-conformity within 90 calendar days.

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If the non-conformity is not closed within this timeframe, a new initial audit shall be required.

**P 5.5.b** Where a minor non-conformity is raised at surveillance or recertification audits, it shall be closed within 30 calendar days. If it is not closed within this timeframe, the non-conformity shall be escalated to a major non-conformity.

**P 5.5.c** Where a major non-conformity is raised at surveillance or recertification audits, it shall be closed within 30 calendar days. If it is not closed within this timeframe, the certificate shall be suspended.

**Guidance P 5.5** *For non-conformities identified during an audit, the formal notification is the audit report issued by the CAB. For non-conformities identified outside an audit, formal notification means written communication from the CAB (e.g. email or letter). The timeframe for closing the non-conformity begins on the date the organisation receives this notification.*

**P 5.6** All non-conformities identified shall be addressed in a timely manner to ensure correction, elimination of root causes where required, and prevention of recurrence.

**P 5.6.1** For minor non-conformities, the organisation shall:

**P 5.6.1.a** Implement prompt corrective action to contain and address the identified non-conformity.

**P 5.6.1.b** Apply any additional actions needed to ensure the non-conformity has not affected other products, processes, or compliance with this Standard, and update relevant processes, documentation, or controls where applicable.

**P 5.6.1.c** Ensure relevant personnel are informed and, where necessary, provided with training to support sustained compliance;

**P 5.6.1.d** Maintain robust records demonstrating the corrective action applied and its implementation.

**P 5.6.2** For major non-conformities, the organisation shall:

**P 5.6.2.a** Implement prompt corrective action to contain the non-conformity and prevent further impact.





























































**P 5.6.2.b** Conduct a root cause analysis and establish, document, and implement a Corrective Action Plan that includes actions to eliminate the identified root cause.

**P 5.6.2.c** Update relevant processes, documentation, or controls, and ensure that relevant personnel are informed and trained where necessary.





**P 5.6.2.d** Maintain robust records demonstrating correction, root cause analysis, corrective actions, and their implementation.









































**P 5.7** As part of prompt corrective action, the organisation may request that the CAB suspend a site in order to prevent impacts on the wider Group or CFO certificate. The site may be reinstated once the non-conformity has been closed.

## Additional requests for supply chain assurance

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					<b>P 5.8</b> The organisation shall cooperate fully with any additional requests from the CAB, assurance provider, MSC/ASC and/or designated agents for traceability documentation and sales/purchase records relating to certified products.
					<b>P 5.9</b> The organisation shall allow the CAB, assurance provider, MSC/ASC and/or designated agents to collect samples of certified products, raw materials, work-in-progress products, finished products, or other relevant substances from the site for the purposes of DNA testing, product authenticity, or verification of conformity.
					<b>Guidance P 5.8 &amp; P 5.9</b> <i>Samples from certified sources include product that is not sold or dispatched as certified. Collection of samples not sold or dispatched as certified will be conducted on an as needed basis for investigations.</i>
					<b>P 5.10</b> Where product authentication testing (conducted by the CAB, MSC/ASC, designated agents, or by the organisation as part of its own quality controls), identifies a product as potentially non-conforming, the organisation shall:
					<b>P 5.10.1</b> Investigate the source of the issue.
					<b>P 5.10.2</b> Provide the CAB with the test results and, where non-conforming products are confirmed, a corrective action plan.
					<b>P 5.10.3</b> Cooperate with any further sampling or investigation required.
					<b>P 5.11</b> The organisation shall have a procedure in place to report and effectively manage incidents related to the scope of certification. The procedure shall ensure as a minimum:
					<b>P 5.11.a</b> Formal recognition (if identified by the organisation) or acknowledgement (if communicated to the organisation) of the incident and communication to the CAB within five (5) working days.
					<b>P 5.11.b</b> Gather and verify all necessary information to evaluate the incident and prepare action plan.
					<b>P 5.11.c</b> Formally communicate the action plan to the CAB.
					<b>P 5.11.d</b> That appropriate corrective and preventive actions are taken to address the incident.
					<b>P 5.12</b> The organisation shall facilitate and cooperate with any investigation conducted by the CAB, MSC/ASC and/or any other designated agent.
					<b>P 5.13</b> The organisation shall keep records of all incidents that may have occurred.
					<b>P 5.14</b> In the case of an incident, the organisation shall grant access to records of certified and non-certified products, if deemed necessary by the CAB, assurance provider, MSC/ASC and/or designated agents.

## Suspension and withdrawal

					<b>P 5.15</b> In case of certificate suspension, the organisation shall have a system in place to ensure:
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**P 5.15.a** Immediately cease to sell any products as certified, including previously labelled or marked with the MSC trademarks, or to make any claims that imply that they comply with the requirements for certification.

**P 5.15.b** Immediately discontinue the use of all advertising material (specify to remove all label and references to MSC) that contains any reference to or claims regarding MSC certification and this Standard, until the certification is reinstated.

**P 5.15.c** Inform all existing certified and relevant non-certified customers of the suspension in writing within four (4) days of the suspension maintain records to demonstrate all the above.

**P 5.16** Where a certificate has been suspended, the organisation shall submit a corrective action plan acceptable to the certification body within 30 calendar days of receipt of the audit report in order to have the suspension lifted.

**P 5.17** In case of certificate withdrawal, the organisation shall have a system in place to ensure:

**P 5.17.a** Immediately cease to sell any products previously labelled or marked using the MSC trademarks, or to make any claims that imply that they comply with the requirements for certification.

**P 5.17.b** Immediately discontinue the use of all advertising material that contains any reference to or claims regarding MSC certification and this Standard.

**P 5.17.c** At its own expense remove all uses of MSC's name, initials, label, certification mark or trademarks from its products, documents, advertising or marketing materials according to MSC Label Licencing Agreement timeframe.

**P 5.17.d** Identify all existing certified and relevant non-certified customers, inform those customers of the withdrawal in writing within four (4) days of the withdrawal, and maintain records.

**P 5.18** Where a certificate is withdrawn, the organisation, including any legal entity operating under the same ownership or control, shall not be eligible to reapply for certification under this Standard for a period of two (2) years from the effective date of certificate withdrawal.

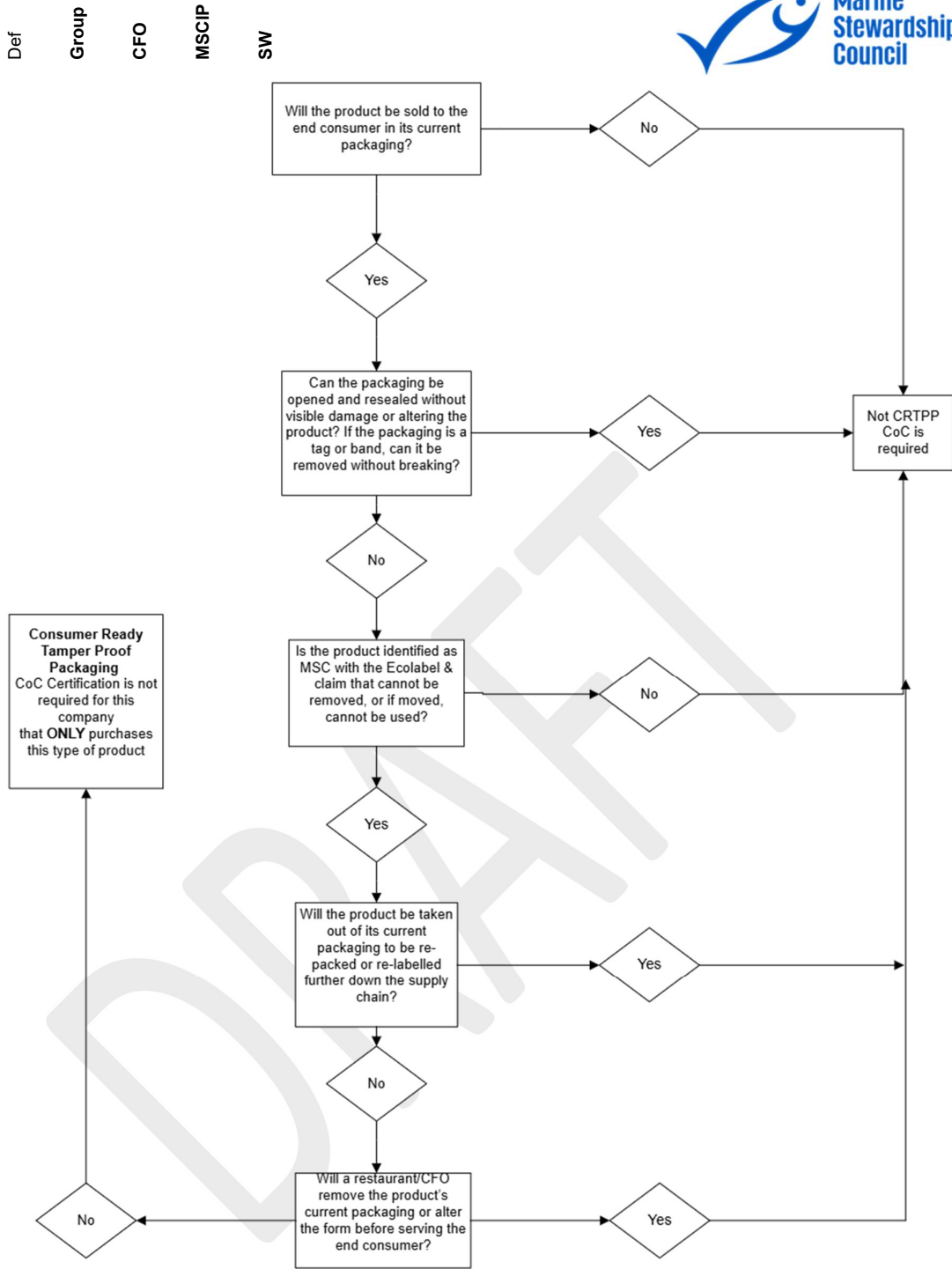


Figure 1 CRTPP decision tree

Table 1 Activities table

ASC Aquaculture	This shall only be 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: <ul style="list-style-type: none"> <li>- 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.</li> <li>- Secondary processing – any subsequent change made after primary processing. E.g. breading, glazing, cooking, smoking, frying, portioning etc.</li> <li>- Preservation – any modification to ensure the long-term conservation of the product. E.g. Examples are; freezing, storing on ice, salting, dehydrating, vacuum sealing.</li> </ul>
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).

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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.
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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