



# **MSC Chain of Custody Review: Summary of Proposed Changes**

This document supports the public consultation on proposed changes to the MSC Chain of Custody Standard and the MSC Certification Requirements.



## **MSC Chain of Custody Standard Review: Consultation on proposed changes**

The MSC is currently carrying out a review of its Chain of Custody Standard to ensure it reflects industry best practice, remains accessible and relevant to the seafood industry, and can be efficiently and effectively applied.

The review will focus on the three versions of the MSC Chain of Custody Standard (Default, Group and Customer Facing Organisations (CFO)), and the Chain of Custody Certification Requirements. The MSC will also review the ASC Chain of Custody module requirements with the aim of improving alignment with the MSC Chain of Custody program where appropriate.

A series of changes to the Standard and Certification Requirements have been developed and the MSC is seeking feedback on the proposals through a 60-day public consultation.

The consultation is **open between 31 March and 30 May 2026**. During this time, stakeholders are invited to review the proposals and provide feedback via an [online survey](#)<sup>1</sup>.

Stakeholders are encouraged to read the summaries below alongside the draft proposals in the [CoC Standard](#) and [CoC Certification Requirements](#)<sup>2</sup>. Versions of both documents are available which highlighting changes.

**All feedback should be provided through our online consultation survey.** *A Word document is also available for those who wish to work on their answers offline before submitting them through the survey*<sup>3</sup>.

### **Find out more about the consultation.**

If you have any questions about the consultation, please contact [supplychain@msc.org](mailto:supplychain@msc.org) or [your local MSC representative](#).

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<sup>1</sup> Survey will be available in English, French, German, Japanese, Mandarin, Polish, Spanish

<sup>2</sup> You may also wish to refer to the [MSC-MSCI Vocabulary](#) for terminology definitions.

<sup>3</sup> Both survey and word document of the survey will be available in the following languages - English, French, German, Japanese, Mandarin, Polish, Spanish

## Summary of proposed revisions

The table below provides an overview of the revisions proposed and highlights whether the change is being made to the Chain of Custody Standard or the accompanying Certification Requirements.

Each section also contains references the relevant document where you will find the full proposal.

Proposed Revision	Summary of Changes	CoC Standard	CoC Certification Requirements
One MSC CoC Standard document  <i>Modified</i>	Combine the three existing models of the CoC Standard (Default, Group, and Consumer-Facing Organisation) into a single document with the addition of the MSC Improvement Program and requirements specific to Seaweed.  As part of the consolidation process, the content has been reorganised to align more closely with similar standards and ISO guidance, with the <b>intention</b> to improve the overall structure, logic, and clarity for users.	Yes: revised CoC Standard	No: Not applicable
Eligibility Requirements  <i>New &amp; Modified</i>	The Eligibility Requirements determine whether a business can be audited against the Standard, and whether a business can retain certification.  The eligibility requirements have been clarified and expanded to ensure all organisations participating in the CoC program are reputable and comply with applicable regulations for all activities within the scope of the certificate.	Yes: Section 2.0 Eligibility Requirements	Yes: Section 5.0 Eligibility Criteria
Certification Scope  <i>New</i>	“Certification scope” has now been defined with prescribed information about the organisation (certificate holder) and their activities, including all sites and subcontractors within scope.  <b>Intention:</b> To provide greater detail and visibility about the entities and activities included within the scope of certification, to better define and manage scope and scope extensions and to strengthen program oversight by CABs and the MSC.	Yes: Section 1.0 Scope of the CoC Certification	Yes: See 8.2

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<p>Removal of Under Assessment Product (UAP) from CoC program</p> <p><i>Removed</i></p>	<p>Remove the option of allowing products from fisheries which are under assessment against the MSC Fisheries Standard - Under Assessment Products (UAPs)- to enter the CoC Program. <i>UAP reference was previously found in Principle 5 – The organisation’s management system addresses the requirements of this Standard (Section 5.6 for Default and Group, Section 5.7 for CFO).</i></p> <p>The proposal will also reverse a previous interpretation that allowed subcontractors to process and trade UAPs, to now restrict their activities to storage and transport only. <i>UAPs will remain as a temporary status category in the MSC Fisheries Program and under the management of the certified fishery.</i></p> <p>To minimise any unintended consequences resulting from the removal of UAPs from the CoC program; CoC variation requests will remain available.</p> <p><b>Intention:</b> To reduce the risk of substitution in the MSC Chains of Custody, where CoC auditors have limited opportunity to verify that UAPs are properly separated and managed, for example due to seasonal operations or the use of short-term subcontractors.</p>	No: Removed	No: Removed
<p>Fish Meal Fish Oil (FMFO) Segregation</p> <p><i>New</i></p>	<p>Introduce a new requirement in the CoC Standard that directly addresses the need to demonstrate how cross-contamination between certified and non-certified fish meal and fish oil products is reduced.</p> <p>We have developed two proposals and are seeking input on a preferred approach. Option 1 prescribes a process of flushing with certified product; and Option 2 allows flexibility in the method used to reduce cross-contamination risks.</p> <p><b>Intention:</b> Reducing likelihood of cross-contamination between certified and non-certified products.</p>	Yes: Principle 3 – Certified products are segregated	Yes: See 17.1.3
<p>Internal Traceback Exercise</p> <p><i>New</i></p>	<p>Introduce a requirement for certificate holders to complete one internal traceback exercise for an MSC-certified product or ingredient of their choice between third-party audits. The traceability information collected during this exercise—called Key Data Elements (KDEs)—</p>	Yes: Principle 4 – Certified Products are traceable and	Yes: Section 19 Internal traceback exercise

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	<p>must be based on the relevant Critical Tracking Events (CTEs) for the selected product or ingredient and must align with the certificate holder’s scope of certification.</p> <p>This requirement does not replace any existing traceability or audit obligations. However, during the audit, the auditor will verify that the internal traceback exercise has been:</p> <ol style="list-style-type: none"> <li>completed before the audit;</li> <li>conducted using a product or ingredient different from that used in the previous exercise, where applicable; and</li> <li>carried out using the MSC traceback template.</li> </ol> <p><b>Intention:</b> To support and build the capacity of certificate holders to respond to evolving traceability requirements as defined by regulatory import controls (e.g. US-FSMA 204; EU control regulations/IUU) and industry best practice (Global Dialogue on Seafood Traceability (GDST)), and to improve the speed of traceability data retrieval.</p>	volumes recorded	
<p>Traceability - Product and Supplier Level KDEs</p> <p><i>New</i></p>	<p>Introduce requirements for CoC certificate holders to have <i>access</i> to a standardised set of traceability information at both the fishery (or farm) level and the product or supplier level (supply chain). This will be achieved by requiring the collection of specified traceability data (Key Data Elements – KDEs) linked to the certified product(s) and the critical tracking events (CTEs) within their scope of certification.</p> <p>To demonstrate compliance, certificate holders must be able to <i>demonstrate they can access</i> relevant KDEs when requested by a CoC auditor during an audit.</p> <p>MSC is seeking feedback to assess the feasibility of the proposal and to support further refinement. Notably, we are seeking feedback on the preferred option for the refinement of the prescribed KDEs (traceability data) related to fishery, transshipment and landing events (CTEs) required.</p> <p><b>Intention:</b> To strengthen traceability across MSC programs, support the collection and tracking of traceability information back to origin (certified fishery/farm) and improve the quality and availability of fishery and product-level information for all CoC certificate holders.</p>	<p>Yes: within Principle 1 Certified products are purchased from certified suppliers, Principle 2 Certified products are identifiable, and Principle 4 – Certified Products are traceable and volumes recorded</p>	<p>Yes: Product and Supplier level KDEs are referenced within several areas of the revised CoC CR</p>

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<p>Internal Management System – Requirement Amendments</p> <p><i>Managing incidents, responding to suspensions and withdrawals, and record keeping</i></p> <p><i>New &amp; Modified</i></p>	<p>The new / modified requirements for three key elements of the certificate holders' internal management system will be reflected in the CoC Standard and the CoC Certification Requirement (CoC CR) documents.</p> <p><b>Intention:</b> Improve alignment between the General Certification Requirements (GCR), CoC Standard and CoC Certification Requirements by introducing new/modified requirements that clarify what each party must do to manage incidents clearly and consistently, with the aim to strengthen the integrity of the MSC CoC Program.</p> <ol style="list-style-type: none"> <li><b>1. Incident Management</b> – Organisations are required to have a procedure in place to report and effectively manage any incident related to certified products and keep relevant records. Any incident identified by the organisation is to be reported to the CAB within 5 working days of identification. <i>“Incident” is defined in the <a href="#">MSC-MSCI Vocabulary</a>.</i></li> <li><b>2. Requirements in the case of Suspensions and Withdrawal</b> – in the case of suspension or withdrawal of an organisation's certificate, the organisation should have a system to stop making claims and using the certification logo. Records shall be kept to show the system is effective.</li> <li><b>3. Record keeping</b> – the duration has been modified to meet assurance and verification needs. The proposed modification is for organisations to maintain records that demonstrate compliance to the CoC Standard for the <i>“current and the previous cycle of certification, one year after the products' expiry date, or as per legal requirements, whichever is longer”</i>.</li> </ol>	<p>Yes: Section 3.0 Management &amp; Principle 5 – Program Assurance</p>	<p>Yes: Section 22.0 Incidents and Investigations</p>
<p>Internal Management System Group requirements</p> <p><i>New &amp; Modified</i></p>	<p>Revise requirements related to the internal management system of the Group model of the CoC Standard, including formalised site agreements, clearly defined roles, and stronger oversight. This includes assigning a designated party with the responsibility for ensuring conformity with the relevant requirements across all sites.</p> <p><b>Intention:</b> Remove existing ambiguity and clarify responsibilities at a group and site level to strengthen the internal management system.</p>	<p>Yes: within Section 3.0 Management System &amp; Principle 5 – Program Assurance</p>	<p>No</p>

Proposed Revision	Summary of Changes	CoC Standard	CoC Certification Requirements
<p>Auditor Qualifications</p> <p><i>Modified</i></p>	<p>The CoC auditor and CAB decision maker qualification requirements have been reviewed to increase the robustness and credibility of the CoC program and to address and respond to known barriers/accessibility challenges.</p> <p>The proposed modifications to the CoC auditor and decision-making qualifications are:</p> <ol style="list-style-type: none"> <li>1. Consolidate and restructure all MSC CoC auditor and CAB decision-maker qualification requirements into one unified table in one document.</li> <li>2. Training providers for CoC auditors no longer need to be formally recognised by CQI/IRCA, Exemplar Global. Instead, CABs must verify the competence of the provider to deliver the auditing course based on <a href="#">ISO 19011</a>.</li> <li>3. Strengthen technical expertise and competency requirements for CoC auditors by adding specific specialised requirements (traceability, supply chains, group audits and CFO training).</li> </ol>	<p>No: Not applicable</p>	<p>Modifications have been made to requirements currently outlined in Table 1 of the <a href="#">CoC CR v3.2</a>. These requirements will be outlined in the General Certification Requirements (GCR) document to merge with current Table 1 of the <a href="#">GCR v2.7</a>.</p>
<p>Risk Assessment</p> <p><i>Modified</i></p>	<p>An MSC-defined risk assessment is completed by auditors in the audit planning phase. The MSC proposes to revise the risk assessment questions and create one standardised risk assessment. This requirement has been extended to all organisations - including those certified to the Default version of the Standard</p> <p>The revised risk assessment will assign organisations to one of three risk categories — low, medium, or high. For Group and CFO models, this category will determine the number of sites to be sampled for audit by the CAB. It will also help prioritise assurance activities for all organisations, such as unannounced audits and DNA testing.</p> <p><b>Intention:</b> Strengthen program integrity by ensuring the risk assessment reflects best practice and all recognised risk factors are accounted for. Removing unnecessary complications and inefficiencies from two independent risk assessments (one for Group, one for CFO) with the aim to improve consistency.</p>	<p>No: Not applicable</p>	<p>Yes: Section 10.0 Audit Planning (<i>also referenced in Section 11.0 Unannounced audits and Section 12.0 Audit Methodology and Frequency</i>)</p>

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<p>Audit process</p> <p><i>Interim certification, consecutive audits, audit window</i></p> <p><i>Modified &amp; Removed</i></p>	<p>Modifications to address inconsistencies in the current CoC Standard and CoC Certification Requirements and to strengthen program integrity.</p> <p>Three modifications are proposed which will be reflected in the CoC Certification Requirements (CoC CR) documents, are the following:</p> <ol style="list-style-type: none"> <li><b>1) Interim Certification</b> – The provision of a temporary “interim certification” has been removed from the CoC program. This means organisations will no longer be able to sell products as certified before an on-site audit takes place. The removal of interim certification from the CoC program adds integrity to the program and ensures compliance to ISO 17065.</li> <li><b>2) Consecutive Audits</b> – Under CoC CR v3.2, a CoC auditor may audit the same client for up to six consecutive years. MSC proposes reducing this to a maximum of four consecutive audits (rather than years). This would apply to initial audits, surveillance audits and recertification audits only.  This change is intended to strengthen auditor impartiality.</li> <li><b>3) Recertification audit window</b> – The recertification audit must be completed before the CoC certificate expiry date. Under the current requirements, the audit can take place within a six-month window (three months before or three months after the expiry date). The MSC proposes that the audit may take place up to 120 days (four months) before the expiry date. This change retains some flexibility, improves consistency and ensures that organisations cannot sell certified products after their certificate has expired.</li> </ol>	<p>No: Not applicable</p>	<p>Yes: Section 10.0 Audit Planning (<i>for Consecutive Audits &amp; Audit Window</i>)</p>
<p>Audit delivery</p> <p><i>Onsite, hybrid and remote</i></p> <p><i>New &amp; Modified</i></p>	<p>Expand audit delivery options by introducing a “hybrid audit” format and allowing remote audits to also be performed in the following situations:</p> <ol style="list-style-type: none"> <li>1. Surveillance audits for organisations that handle only sealed certified seafood (seafood that is received and dispatched without any changes to its tamper-evident packaging, also known as ‘box in box out’).</li> <li>2. Audits of central office functions for Group and CFO (multisite) organisations.</li> </ol>	<p>No: Not applicable</p>	<p>Yes: Section 12.0 Audit methodology and frequency</p>

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	<p>Use of these audit formats is conditional on the completion of a feasibility assessment and confirmation that no significant integrity risks are identified. The feasibility assessment is conducted by the Conformity Assessment Body (CAB) during the audit planning stage.</p>		
<p>Audit process:</p> <p><i>Changes to the non-conformity process</i></p> <p><i>Modified in CoC CR &amp; New requirements in the CoC Standard to align with requirements in the CoC CR</i></p>	<p>To simplify and strengthen the non-conformity process. These changes will support consistent and credible application and improve alignment across the CoC program models (Default, Group, and CFO).</p> <p>At a high level, the proposed changes are the following:</p> <ul style="list-style-type: none"> <li>• Establish a single framework for grading and managing non-conformities across all models (Default, Group, and CFO). Non-conformities will be graded only as major or minor. The category of critical non-conformities has been removed.</li> <li>• <i>(Group and CFO models only)</i> Introduce clear escalation thresholds (previously called “reject numbers” in the CoC Certification Requirements). These thresholds replace the use of/need for “systemic” non-conformities.</li> <li>• Require all non-conformities to be raised against the central office, rather than against the central office or individual sites. This will improve consistency and make the central office responsible for correcting and closing non-conformities.</li> <li>• Remove mandatory follow-up audits for organisations using the CFO model after a major non-conformity is raised. Instead, the non-conformity must be corrected and closed before the certificate is issued. If the issue is isolated and affects only one site, the central office may suspend that site while the problem is resolved, without affecting the certification of other sites. Follow-up audits may still be conducted if the Conformity Assessment Body (CAB) considers them necessary to confirm resolution; however, they are no longer mandatory for the CFO model.</li> </ul>	<p>Yes: Principle 5 CoC Program Assurance</p>	<p>Yes: Section 20.2 Non-Conformities</p>