



**Covid-19 pandemic derogation, March 2020**  
**Chain of Custody Certification Requirements and Fishery Certification Process allowing remote audit and extensions to certificates and associated timelines**

Date 27 March 2020

To: MSC Accredited Conformity Assessment Bodies

CC: Assurance Services International, Aquaculture Stewardship Council

In response to the Covid-19 pandemic and consideration of the welfare of all individuals participating in the MSC certification system, the MSC issued a derogation to allow for scheduling and conducting remote site visits and audits for Fisheries and Chain of Custody certificate holders (Coronavirus Announcement, Derogation issued on 28<sup>th</sup> February 2020). We have received requests from certificate holders to allow for further flexibility given the unprecedented circumstances we now find ourselves in. This derogation supersedes the derogation issued on 28<sup>th</sup> February 2020.

This derogation **allows a six-month certificate extension for all Fishery and Chain of Custody certificate holders, according to the specifications below. In addition, requirements for in-person site visits do not apply during the period of this derogation.** Fisheries and supply chain certificate holders could proceed with remote auditing with agreement from CABs, where feasible.

**Fisheries:** Automatic six-month extension shall be applied to all fishery certificates and associated timelines, including deadlines for client action plans, milestones and conditions. This ensures a consistent approach is taken with all fisheries in light of MSC's requirements for harmonisation. The extension shall also apply to audit and assessment activities and timelines specified in the MSC Fisheries Certification Process, with the exception of objections (to be decided by the Independent Adjudicator) and in certain cases, expedited audits. Guidance on expedited audits will be further defined by the MSC.

Fishery clients can opt to proceed with remote audit or assessment activities during this extension period, i.e. to work to existing or revised timelines, with their CABs, should they so choose. MSC expects a sensible and pragmatic approach will be taken to scheduling surveillance audits at the end of this derogation period where existing FCP requirements permitting flexibility in scheduling audits should allow audits to be staggered (i.e. FCP 2.1 clause 7.28.8.1 applies from the new certificate anniversary date).

**Supply chain companies:** Audits may be conducted remotely, however CABs may issue a six-month extension if this is not feasible due to the impact of Covid-19 to audit due dates and certificate expiry. This approach differs from that applied to fisheries and does not provide an automatic extension.



CABs will not need to submit a variation request to delay audit or assessment activities, to apply certificate extensions or to conduct remote audits or assessments. Certificate holders are expected to continue to conform to the requirements in the MSC Standards during the derogation and this will be subject to review at subsequent audits and assessments once the derogation is lifted. CABs may conduct initial chain of custody audits and fishery assessments remotely.

CABs shall maintain a list of certificate holders where this derogation has been applied and shall make this list available for MSC or ASI on request. The MSC will provide further guidance to support the implementation of this derogation. The MSC will review this derogation on a monthly basis, and may be extended if the Covid-19 disruption continues or intensifies.

For more information about how Conformity Assessment Bodies (CABs) should implement the derogation please refer to:

- [Guidance to CABs – Fisheries](#)
- [Guidance to CABs – Chain of Custody](#)

For any other questions please contact the MSC Supply Chain Standards ([supplychain@msc.org](mailto:supplychain@msc.org)) and Fisheries Standard ([fisheries@msc.org](mailto:fisheries@msc.org)) teams. The MSC will continue to monitor the situation and provide any updates.

Date of issue: 27 March 2020  
End of validity: 27 September 2020

Sincerely,

A handwritten signature in black ink, appearing to read 'Rohan Currey'.

Dr. Rohan Currey  
Chief Science and Standards Officer