



# Get Certified

**Your guide to the MSC and ASC Chain of Custody certification process**

**Chain of Custody Standard: Group Version**

For organisations with a central office and many locations distributing, processing or trading certified seafood such as cooperatives, franchises and vertically-integrated companies.

# Contents

Welcome .....	03
Do you need certification? .....	05
The certification process .....	07
Preparing for the audit .....	10
The audit .....	11
After the audit .....	14
Using the MSC and ASC trademarks to sell certified seafood	16
Maintaining certification .....	17
Complying with the requirements on forced and child labour .....	21
Staying in touch with your certification body .....	24



# Welcome

Join the international seafood community that proudly supports sustainable seafood certified to the Marine Stewardship Council (MSC) Fisheries Standard or farms certified to the Aquaculture Stewardship Council (ASC) Farm Standard. Together we can protect the world's seafood for the future.

The Chain of Custody Standard ensures certified seafood can be traced back to a certified source. The aim of this guide is to give you an overview of what to expect during each stage of the certification process. This guide covers the Chain of Custody Standard: Group Version 2.0. If you have questions at any stage, your local MSC or ASC office will be happy to help.

Contact your local MSC office at

✉ [www.msc.org/commercial-contacts](http://www.msc.org/commercial-contacts)

Contact your local ASC office at

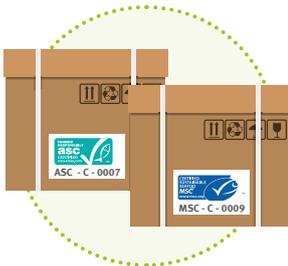
✉ [www.asc-aqua.org/what-you-can-do/get-certified/chain-of-custody](http://www.asc-aqua.org/what-you-can-do/get-certified/chain-of-custody)

## The Chain of Custody Standard: Group Version has six principles



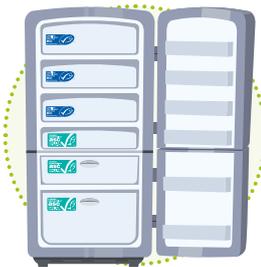
### Principle 1:

Companies must purchase certified product from a certified supplier



### Principle 2:

Certified products are clearly identifiable



### Principle 3:

Certified products are separated from non-certified



### Principle 4:

Certified products are traceable and volumes are recorded



### Principle 5:

Your management system addresses the requirements of the Chain of Custody Standard



### Principle 6:

Specific requirements for group Chain of Custody

## Do you need certification?

The Chain of Custody Standard is a traceability and segregation standard that is applicable to the full supply chain from a certified fishery or farm to final sale.

The Chain of Custody Standard has three versions, to meet the needs of the diverse range of supply chain businesses. This guide relates to the **Group version** of the Standard, which has been designed for companies operating across multiple locations. You can find out about the other two versions of the Standard (Default and Consumer-Facing Organisation) on the [MSC website](#).

Businesses can be certified to the Group version if they have effective internal controls and only a sample of sites handling or trading certified seafood need to be audited. This is more efficient and cheaper than each site being audited. These internal controls are managed by a central office, which must be a legal entity (not necessarily a headquarters) that coordinates audits and ensures that each site complies with the Standard.

### Businesses are eligible for Group certification if:

- The central office takes control in one of the following ways:
  - The sites are fully owned by or franchises of the central office.
  - The central office has an agreement with the sites requiring them to conform to the Standard.
- They operate across several sites that process, pack or distribute product. For example, a seafood distributor cooperative with distribution centres across Europe; or a trans-national seafood processing company with 10 sites.
- A group manager is in place to coordinate the certificate for companies that are independent to one another. For example, a set of independent restaurants that appoint a group certification manager.

### Businesses not eligible for Chain of Custody certification :

- A company that has been successfully prosecuted for a forced or child labour violation in the last two years.
- A company whose certificate was withdrawn for a breach of chain of custody in the last two years.
- A company whose certificate was suspended in the last six months.
- Enhanced fishery or farm operations that are out of scope of the MSC Fishery or ASC Farm Standards.

### When Chain of Custody certification is not needed:

- If your company buys pre-packed, labelled certified products that will be sold to the end consumer without being opened, re-packed or re-labelled. Such items are known as consumer-ready tamper-proof products. Retail packages of frozen fish fingers or tins of smoked mackerel fillets are examples of consumer-ready tamper-proof products.
- If your company buys certified products but does not wish to sell these on as certified. In this case the chain of custody is broken, and your customers may not make any claims about the product being certified.
- If your company does not take legal ownership of certified seafood. This may be the case if your company provides contracted services for certified companies and therefore can be covered by your customer's Chain of Custody certificate as a subcontractor.

## The certification process

The Marine Stewardship Council (MSC) and the Aquaculture Stewardship Council (ASC) have partnered to share the Chain of Custody Standard. This means you can have one certification audit that covers both MSC and ASC products.



There are five steps to Chain of Custody certification:



The Chain of Custody certification process, from application to the awarding of a certificate, is managed by an independent and accredited certification body. The certification body will appoint an auditor who will become your most frequent contact throughout the certification process.

If you already have audits for other programs (for example, programs recognised by the Global Food Safety Initiative), it is worth checking with your certification body to see if they can introduce the Chain of Custody audits into your existing auditing schedule.

## GOOD TO KNOW

Preparation and good project management are key to ensuring a smooth, timely and cost-effective certification. It is important to designate a member of staff or a project manager who will take responsibility for managing the certification process. This Chain of Custody contact person will liaise with the certification body and should familiarise themselves with this guide and the [Chain of Custody Standard](#).



## Step 1 Choosing a certification body

The role of a certification body is to provide an independent, third-party evaluation of your company's chain of custody procedures and to appoint an auditor.

The first step is to choose a certification body that operates where your company is based. All certification bodies are approved by [an independent assurance body](#).

We recommend that you approach more than one certification body for quotes. The total cost for the full certification service is likely to include travel costs, audit fees, and possibly other charges such as scope extensions. Make sure you get a long-term picture of the cost structure. The MSC or ASC cannot influence the cost of certification, nor does the MSC or ASC receive any of this payment.

### To quote on your certification, certification bodies may ask:

- Which seafood species you want to buy and sell as certified.
- What activities you perform with the certified seafood (for example packing, processing or trading).
- If you have any certified suppliers.
- Where your company is based and how many sites it has.
- If you intend to use subcontractors to process, pack, transport or store certified seafood.
- If you handle both certified and non-certified species.

Once you accept a quote, the certification body will send you a contract.



## Step 2 Preparing for the audit

The audit can be simple and straightforward if you have a clear plan of what needs to be done, by whom and by when.

### Training staff

It is your company's responsibility to ensure that all responsible personnel understand their role in maintaining chain of custody and product integrity, as required by Principle 5 in the Standard. The Standard defines responsible personnel as those who make decisions or carry out procedures that can affect the integrity of certified seafood.

Your company may be able to incorporate specific Chain of Custody training into an existing staff training program.

Training can take any format: In-person, online, on paper, and can be delivered by anyone who knows (or can quickly learn) about the requirements. It is important to keep all records of your staff training program. Check with your local MSC office for available training material in your local language.

### Site list

Your site list shows the sites you want to include in your group certificate, and details:

- a designated contact at each site who is responsible for site conformity with Chain of Custody
- name and position of this contact
- email or phone for this contact
- physical and postal address of each site.

Your certification body will request this site list before the initial audit so they can calculate the number of sites to visit. As the number of sites in your certificate changes, there are specific rules to follow in communicating these changes to your certification body, which are detailed on page 25.

### Pre-audit checklist

Use the [MSC pre-audit checklist](#) to determine how much of the Standard your central office and sites meet without having to make any changes, and where you need to make adjustments to your operations.

For the MSC pre-audit checklist, please visit [www.msc.org/docs/coc-group-pre-audit-checklist-v2](http://www.msc.org/docs/coc-group-pre-audit-checklist-v2)

## Initial internal audit

Your group must appoint an internal auditor to conduct on-site internal audits before calling in the certification body. The aim is to check that any changes you have made after reviewing the pre-audit checklist have actually been implemented and that they are working in practice.

All sites must comply with the Standard, however those meeting any of the following criteria do not need an initial internal audit:

- Sites that only handle certified products in sealed containers (boxes, packages, bags, pallets, etc.)
- Sites that do not physically handle certified products (are traders only)
- Sites that handle only certified seafood (no non-certified seafood is on-site)

## Internal auditor

Your internal auditor can be anyone with knowledge of the Chain of Custody Standard, and who is capable of objectivity in audit and decision-making. They need to demonstrate competence in carrying out internal audits, including internal audit processes, identification of non-conformities, and issuing of corrective actions.

## Scheduling your audit

When scheduling a date for the audit, bear in mind it may require booking in advance, depending on the auditor's availability. Also remember to request your preferred language for the audit.

### GOOD TO KNOW

During the audit, the auditor will assess whether your company meets the Standard. They cannot offer advice on improvements and if they find your company doesn't meet the Standard they will raise a non-conformity.



## Step 3 The audit

All Chain of Custody audits (initial, surveillance and re-certification) cover the same audit process, with the aim to check whether your company meets the Chain of Custody Standard.

The auditor will be looking for evidence that demonstrates the effectiveness and durability of the procedures, processes, systems and training that your company has in place to fulfil the requirements of the Standard. They will therefore ask to review documents or records, interview staff, and see your process in action.

### Audit location

All audits take place on-site at your company's designated central office and a sample of sites. How many sites depends on the total number of sites included in the certificate, and your company's risk profile. Your risk level will be calculated by the certification body based on factors such as your activity, other certifications held, location, and others. See the [pre-audit checklist](#) for more detail.

### Audit process

The audit begins with an opening meeting, during which the auditor confirms your company's eligibility to be certified against the Chain of Custody Standard, the audit plan, the certificate's scope, the type of documentation for review, site audits and if they need to visit any subcontractors. The auditor will set a time limit for your company to provide any necessary records.

In addition to your appointed Chain of Custody contact person, we recommend inviting a few other members of staff to this meeting, such as the internal auditor. Use the opening meeting to clarify any questions you have regarding your audit or the certification process.

### Audit duration

The duration of the audit will vary depending on the number of sites to be visited, the complexity of your operations, your activities related to certified seafood, and the number of species you intend to buy and sell as certified.

### Traceability tests

Under specific circumstances, your auditor may take small samples of certified seafood for traceability testing, such as DNA testing.

## During the audit, the auditor will:

### Check

- The measures taken by your company and any subcontractors to segregate, identify and prevent mixing between certified and non-certified seafood
- The permission to use the MSC label and ASC logo by asking for proof of approved packaging designs covered by a valid licence agreement, see page 16 for more information
- Non-certified ingredients used have been correctly calculated (where applicable)

### Review

- The management system/s for each activity in scope
- The content and implementation of written procedures (i.e. approved buying lists, training manuals)
- The contract processing of certified seafood for others (if applicable)
- The records showing purchase, receipt, sale and physical handling of certified species
- The group controls, schedule and internal audit outcomes

### Interview

- A sample of responsible personnel on their competency, understanding and application of the chain of custody procedures (for example the auditor may ask members of staff to explain their role in ensuring product integrity)

### Verify

- Your company's and any subcontractor's records, where relevant:
  - Traceability tests – linking input and output through delivery numbers and records of internal traceability, purchase, handling and supply
  - Matching purchase with delivery records against the product
  - Input-output reconciliation based on a time period and/or batch, which includes a conversion rate (yield) calculation and evaluation
- Your company complies with the relevant MSC third-party labour audit requirements

## Audit closing meeting

At the end of the audit, the auditor will call a closing meeting to summarise their findings. They will also confirm that the scope, supplier and subcontractor list is correct and that you know when to inform the certification body of any changes to your certificate.



## Step 4 After the audit

Once the auditor has completed the audit across your group's central office and all sites visited, they will conclude their findings and summarise any non-conformities. Your auditor will send you a summary of all audit findings within 10 working days that will detail any non-conformities raised by the auditor.

### Non-conformities

A non-conformity is raised when the auditor finds a deviation from any of the requirements in the Chain of Custody Standard.

**Table 1:** Required actions for non-conformities at site and central office audits.

	At site audits	At the central office audit	Required actions
<b>Minor non-conformities</b>	A system breakdown unlikely to result in non-certified product sold as certified.	A partial lapse or partial breakdown of activities related to one element of the company's management or internal auditing system.	Send the certification body an effective action plan with corrective actions and timeframes to address them.  Your company will not be certified until the action plan has been sent and agreed by your certification body to be effective.
<b>Major non-conformities</b>	A system breakdown likely to result in non-certified product sold as certified.	A breakdown of activities related to one element of the company's management or internal auditing system.	Send the certification body an effective action plan with root cause analysis, corrective actions and an appropriate timeframe to address them, in order for the certification body to close-out or downgrade the non-conformity within 90 days of the initial audit.  If this cannot be done, your company will need to have another initial audit.
<b>Critical non-conformities</b>	Non-certified product was found to be sold as certified.	A complete breakdown of the company's management system so that site conformity with the standard cannot be relied upon.	Must be corrected before certification can be granted.

## Determining certification

Your certification body must make a decision on whether to grant certification within 30 days of the audit or within 30 days of receiving evidence that leads to the closure or downgrading of a non-conformity. The certification body will send you a finalised version of the audit report within 10 days of this decision.

Where necessary, you will be asked to sign off some sections of the audit report to confirm accuracy. Your certification body will then upload information onto the MSC/ASC database covering scope, subcontractors, suppliers, audit date, the final audit report, your certificate and unique chain of custody code.

## Congratulations, you're certified!

Once certified, your status should appear as valid on the [MSC Find a Supplier directory](#) and/or [ASC Find a Supplier directory](#). You can now officially sell MSC and/or ASC certified seafood.

The MSC and ASC Find a Supplier directories are the official sources of certificate validity. Companies that do not appear with a valid Chain of Custody certificate status on these directories cannot be used as a certified supplier. The audit report and confidential information will not be displayed on the MSC and ASC Find a Supplier directories.

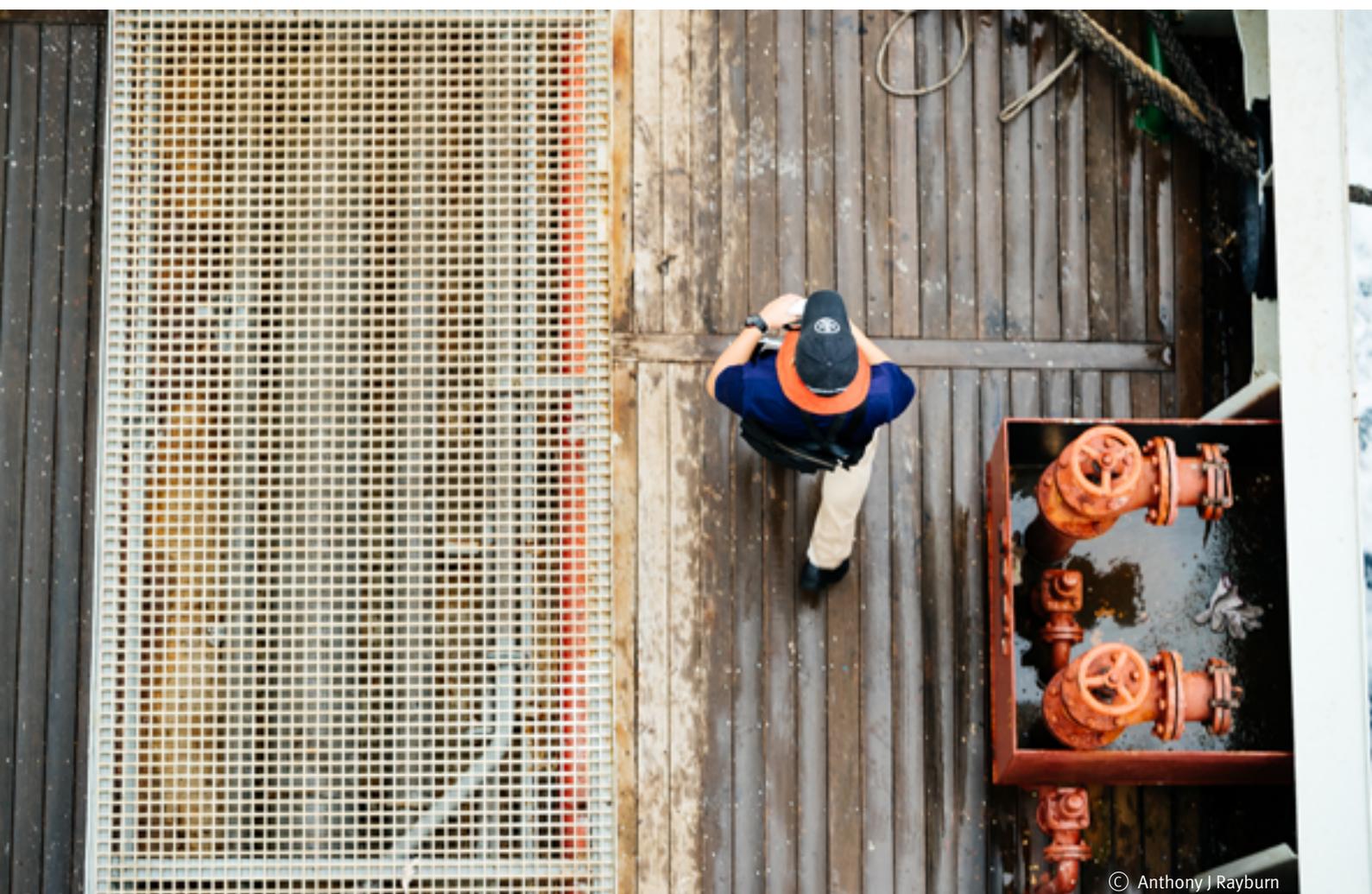


## Step 5 Using the MSC and ASC trademarks to sell certified seafood

Your company must sign a licence agreement if you wish to use any of the MSC's and/or ASC's trademarks on any materials that will be seen by the end consumers or by business customers for promotional purposes.

The licence agreement may be signed whilst your company is an applicant for certification. This enables your company to acquire high-definition files of the MSC ecolabel and/or ASC logo to use in packaging design. In addition to signing a licence agreement, your company will have to submit the packaging designs and a completed [Product Approval Form](#) for both the MSC and ASC containing information about the product you intend to sell with the MSC and/or ASC trademarks. If you are using the ASC logo for business-to-business trading, you will also need approval. You do not need approval if you use the MSC and/or ASC acronyms for traceability, identification or internal training purposes.

Visit [www.msc.org/msc-label](http://www.msc.org/msc-label) or [www.asc-aqua.org/our-logo](http://www.asc-aqua.org/our-logo) for more information.



## Maintaining certification

Your certificate is valid for three years. During this period, your company will receive surveillance audits. Re-certification audits take place every three years.

## Internal audits and annual reviews

Internal audits are required on an annual basis. The purpose of these internal audits is to ensure the group continues to conform with the Chain of Custody Standard: Group Version, and to assess the effectiveness of the group's management system.

Annual internal audits are applicable to all sites except those only handling certified seafood and those that received an external audit from your certification body within the last 12 months with no non-conformities found. These internal surveillance audits can be done remotely or on-site. Internal group reviews are also required on an annual basis, and these can be carried out by the central office, by sites, or a mixture of both.

## Surveillance audits

Surveillance audits are annual for all Group certificates. Surveillance audits can be conducted 90 days before or after the audit due date giving you flexibility to schedule a date that's convenient.

## Site visit

The number of sites to be visited at the surveillance audits is the same or fewer than at the initial audits. Check the pre-audit checklist or ask your auditor how many site visits are due.

There is a small chance that your company will receive an unannounced audit. Each certification body must conduct unannounced audits for at least 1% of their clients. If this happens, you will not be given notice of which day the audit will occur (but you will know the six month window of when your surveillance is due). In this case, it automatically counts as your next scheduled surveillance audit.



## Non-conformity at surveillance

During the surveillance audit, the auditor may raise a non-conformity where there is a deviation from the Standard.

**Table 2:** Required actions for non-conformities at surveillance audit.

	At site audits	At the central office audit
Minor non-conformities	<p>Must be corrected within 12 months (by the next audit).</p> <p>If the auditor finds the minor non-conformity has not been corrected by the next audit, they will raise the grading to a major non-conformity.</p>	<p>Must be correct within 90 days.</p> <p>If not corrected within this timeframe, the non-conformity will be regraded as a major against the central office.</p>
Major non-conformities	<p>Send the certification body an effective action plan with root cause analysis, corrective actions and an appropriate timeframe to address them. Once the corrective actions are implemented, your certification body will be able to close out or downgrade the non-conformity within 30 days of the audit. If this cannot be done, the site must be suspended from the Group certificate.</p>	<p>Must be corrected within 30 days.</p> <p>If not corrected within 30 days, the non-conformity will be re-graded as a critical against the central office and the group suspended.</p> <p>Send the certification body a corrective action plan with root cause analysis.</p>
Critical non-conformities	<p>The site must be suspended immediately from the Group certificate until the non-conformity has been addressed.</p>	<p>The Group certificate will be suspended immediately.</p>

## Certificate suspension

The non-conformity grading system gives your company warnings and opportunities to implement improvements to avoid a certificate suspension. If your company breaches product integrity or the chain of custody, there is cause for immediate action.

A certificate can be suspended for any of the following reasons:

- A critical non-conformity has been raised against the central office.
- The threshold of major non-conformities has been exceeded.
- The company does not agree to a surveillance or re-certification audit within the necessary timeframes.
- The MSCI has withdrawn a company's licence agreement and the company did not follow MSCI's instructions.

Regardless of the cause, from the day of suspension product cannot be sold as certified and you must inform your customers in writing of your suspension. For a suspension to be lifted, a corrective action plan, including a root cause analysis, must be accepted by your certification body and implemented by your company.

## What to do when non-conforming products are found in your company?

Where your company finds mislabelling or non-conforming product and reports it to the certification body, the certification body will not suspend your certificate if you followed the non-conforming product procedure correctly, as this shows that you are willing to maintain product integrity. If the mislabelled or non-conforming product recurs, your company may be suspended.

### GOOD TO KNOW

A certificate can become invalid at any point if a company is found to have been successfully prosecuted for violations of laws on forced or child labour in the last two years.



## Complying with requirements on forced and child labour

The MSC and ASC have introduced changes to the Chain of Custody program to provide greater assurance that MSC/ASC products are not associated with forced or child labour. This means that you may need a labour audit as part of your Chain of Custody certification.

You will need a labour audit if your Chain of Custody (CoC) scope activities include processing (including contract processing and use of a contract processor), packing or repacking or manual offloading directly from a certified fishery or farm **unless** your country is lower risk according to two or more of the following indicators:

- [Country Risk Assessment Process for SA8000](#)
- [International Trade Union Confederation Global Rights Index](#)
- Ratification of five or more UN conventions on forced or child labour, human trafficking or seafood/fishing ([C188](#), [C105](#), [C182](#), [C29](#), [Protocol to C29](#), [Palermo Protocol](#), [UN Slavery Convention \(1926\)](#)), [UN Supplemental Slavery Convention \(1956\)](#), [Port State Measures Agreement](#))
- [US Department of Labor List of Goods made with incidence of forced and child labor](#)

Your auditor will inform you of your country's risk before the day of your CoC audit.

If you do need a labour audit, the audit needs to:

- be on-site
- be done by an independent, third-party auditor
- be one of the labour audit programs recognised by the MSC
- meet the performance criteria of the relevant labour audit program.

Labour audit programs recognised by the MSC	Within these programs, you will have to meet these performance criteria
Amfori Business Social Compliance Initiative	No Zero Tolerance issues found at the audit
SEDEX SMETA	No Business Critical Issues found at the audit
Social Accountability International's SA8000	A valid SA8000 certificate

Zero Tolerance and Business Critical issues are serious labour issues that require immediate action. This may include a breach of local law which presents a critical breach of workers' human rights or a flagrant human rights violation. You can find out more about the [amfori BSCI Zero Tolerance Protocol](#) and the [SEDEX-SMETA Non-Compliance Guidance](#) on their websites.

You will need to follow the audit schedule set by the labour audit program you choose. The audit might be every six months, year or two years.

### Why did the MSC choose these labour audit programs?

The MSC chose to recognise these programs because they are:

- globally recognised
- commonly used in the seafood industry.

### How did the MSC choose the risk scoring indicators?

The MSC conducted extensive external consultation to ensure the risk scoring indicators were appropriate, effective and efficient. The indicators were selected because they are:

- globally recognised
- commonly used in risk assessment methodologies in the seafood industry
- have a transparent methodology
- preferred by stakeholders
- specific to forced and child labour and/or seafood, where available.

### How will you demonstrate to your Chain of Custody auditor that you comply with the relevant programs?

To show that you comply with the relevant labour audit programs, you may be asked to provide a certificate to your auditor. You may also need to log onto the program's platform or portal.

Social compliance audits and access to this platform may be the responsibility of another individual at your company. If this is the case, you need to make sure that person is available on the day of CoC audit to show the labour audit findings.

### What happens if you do not comply?

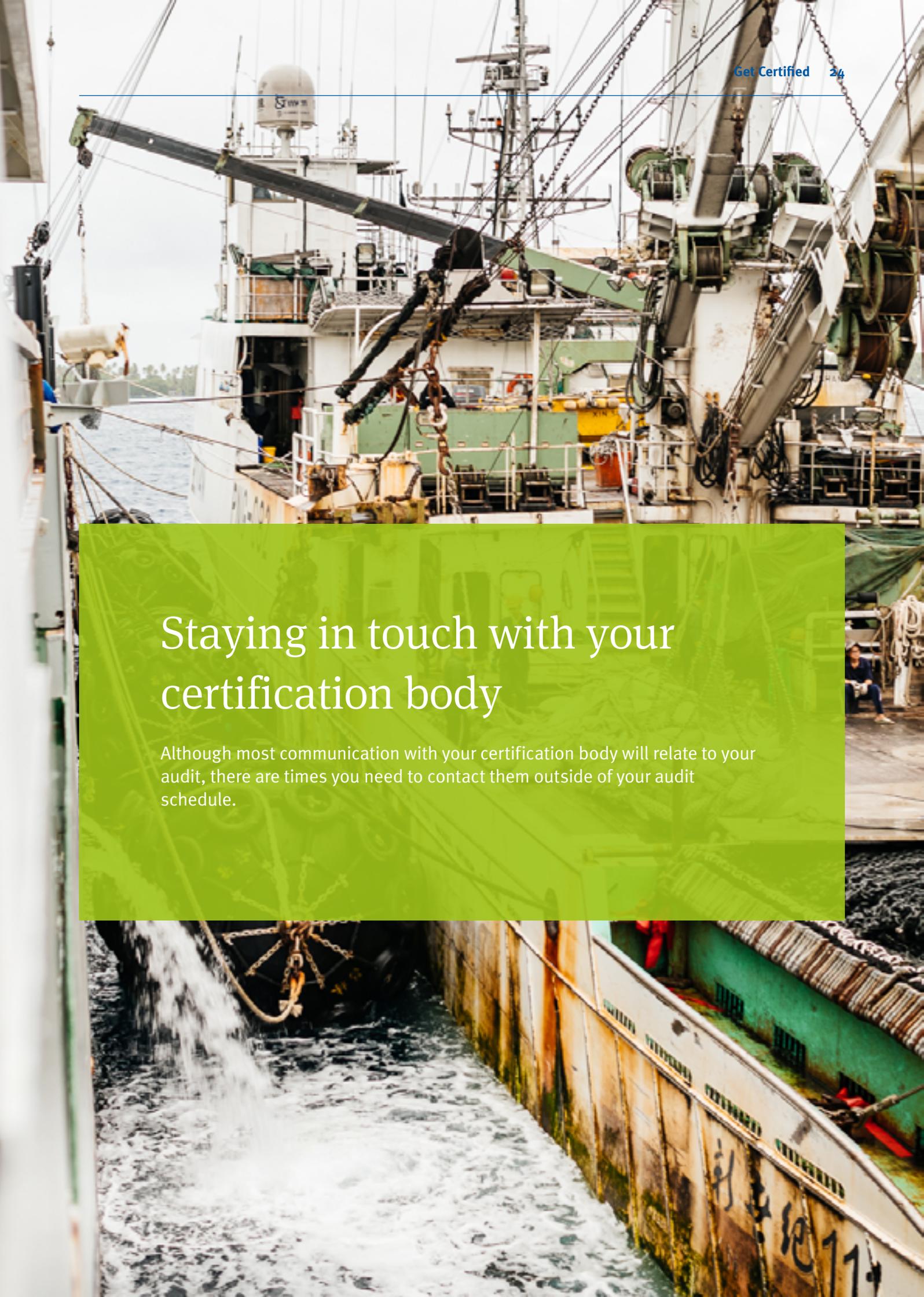
If at any point you do not meet the labour performance criteria in the CoC Standard (for example a Zero Tolerance Issue is found during your amfori BSCI audit), then you must inform your certification body within two working days. You will then have 30 days to address the issue to maintain your CoC certificate.

### Grace period

The MSC/ASC recognises that labour audits can take time and effort to plan. For this reason, we have a grace period for companies.

At your first audit against the new CoC Standard (whether initial, surveillance or recertification) you do not need to complete a labour audit. You will simply be asked to [sign a statement](#) that you agree to complete the labour audit by your next audit.

This means you will have around 12 months from the date of your first audit against the new CoC Standard to complete the labour audit.



## Staying in touch with your certification body

Although most communication with your certification body will relate to your audit, there are times you need to contact them outside of your audit schedule.

## Informing your certification body about changes

You will need to inform your certification body if you:

- Find non-conforming product (within 2 days).
- Receive a new certified species (within 10 days).
- Receive certified product by a new supplier (within 10 days).
- Appoint new staff as your Chain of Custody contact person (within 10 days).
- You failed to meet the labour performance criteria in the Chain of Custody Standard (for example a Zero Tolerance issue is found during your amfori BSCI audit) (within 2 days).
- Add less than or equal to 10% of new sites to the Group certificate (include an updated site list).
- Change certification body.
- Complain about your auditor or certification body.

Request approval from your certification body if you plan to:

- Add more than 10% of new sites to the Group certificate (provide evidence that the sites comply with the Standard).
- Undertake a new activity that is not already in your certificate's scope (at central office or site level).
- Use a new contract processor or packer for certified seafood.
- Buy product certified to a program that shares the Chain of Custody Standard (e.g. ASC).

**Table 3:** Scope activity definitions: Your company’s activities will be classified in your Chain of Custody certificate. The most common activities and definitions are listed below:

### **Trading fish (buying/selling)**

This is likely applicable to all companies, except for subcontractors that do not take legal ownership of certified product.

### **Storage**

Companies that hold certified product in a storage area.

### **Transportation**

Companies responsible for the transport of certified product they legally own.

### **Distribution**

Companies that receive sealed containers, pallets, etc. of certified product that they do not legally own, that may or may not be broken down into smaller units and deliver them to customers or other members of their group.

### **Wholesale**

Companies that receive sealed containers, pallets, etc. that they legally own and sell to customers or other members of their group.

### **Packing/repacking**

When the packaging is changed but the product remains the same.

### **Processing**

Includes primary or secondary processing, value added processing, fish preparation or any other activity where the product is changed (except for ‘retail to consumer’ and ‘restaurant/take away to consumer’).

### **Contract processing**

Any certificate holder that carries out processing on behalf of the legal product owner (does not legally own the seafood).

### **Use of contract processor**

Any certificate holder that uses a non-certified contract processor to process, repack or transform certified product on their behalf.

### **Retail to consumer**

Where the product is purchased, taken away and prepared by the consumer. This includes fish counters at retailers, fish mongers, and markets selling directly to consumers.

### **Restaurant/take away to consumer**

Any foodservice situation where the product is prepared on-site and sold directly to consumers.

# The Chain of Custody Standards

	<b>Default Version</b>	<b>Consumer-Facing Organisation Version</b>	<b>Group Version</b>
<b>Who is it for?</b>	For single or multi-site organisations trading certified seafood, such as a trader operating from one office or a processor with several factory locations.	For retailers, restaurants, caterers and fresh fish counters of any size looking to sell certified seafood directly to final consumers.	For organisations with a central office and many locations distributing, processing or trading certified seafood such as co-operatives, franchises and vertically-integrated companies.
<b>Record keeping</b>	Records must be kept for 3 years or longer if the certified product's shelf life is longer.	Records must be kept for 18 months.	Records must be kept for 3 years or longer if the certified product's shelf life is longer. The central office/group manager must keep an up-to-date site register.
<b>Audit frequency</b>	All sites have a regular audit. Audits can be onsite or remote at a frequency of 12 or 18 months, depending on risk level of business.	The central office, operations sites and a sample of consumer-facing sites are audited onsite annually. Depending on the CFO's risk level, a certain percentage of sites will be audited at short notice (48 hours).	The central office/group management and a sample of sites are audited onsite annually. The sample size depends on the risk level of the group.
<b>Non-conformities at audits and suspension rules</b>	All sites can have non-conformities raised against them. All sites can be suspended from the certificate separately.	Non-conformities are raised against the central office. Suspension affects the entire CFO certificate. In case of non-certified product being sold as certified as a one-off human error at a site, a major non-conformity is raised rather than an immediate suspension.	Non-conformities can be raised against the individual sites and/or the central office/group management. Suspensions can be specific to a site, strata or the entire group.
<b>Internal audits and reviews</b>	No internal auditing requirements.	Optional internal audits.	Mandatory internal audits and reviews.
<b>Training</b>	All responsible staff must be trained.	Strict training requirements for all responsible staff. Training records must be kept.	All responsible staff must be trained. Training records must be kept.

## Get in touch:

---

### Marine Stewardship Council (MSC)

[www.msc.org/commercial-contacts](http://www.msc.org/commercial-contacts)  
[info@msc.org](mailto:info@msc.org)



@MSCecolabel #MSCcertified



/marine-stewardship-council



/sustainableseafood

### Aquaculture Stewardship Council (ASC)

[www.asc-aqua.org/what-you-can-do/  
get-certified/chain-of-custody](http://www.asc-aqua.org/what-you-can-do/get-certified/chain-of-custody)

[info@asc-aqua.org](mailto:info@asc-aqua.org)



@asc\_aqua



/aquaculture-stewardship-councilz

© Marine Stewardship Council 2019

The guide relates to the Chain of Custody Standard: Consumer-Facing Organisation. All details within this document are accurate at the time of publication. This is a guide document only, and if any interpretative issues arise in relation to the content covered in the publication, the text of the English MSC program documents will prevail in all instances.