



Get Certified

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

Chain of Custody Standard: Default Version

For single or multi-site organisations trading certified seafood such as a trader operating from one office or a processor with several factory locations.

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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: Default Version 5.0. 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

Contact your local ASC office at

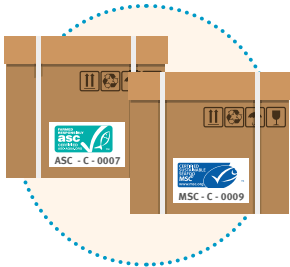
✉ www.asc-aqua.org/what-you-can-do/get-certified/chain-of-custody

The Chain of Custody Standard: Default Version has five 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

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.

Examples of businesses eligible for Chain of Custody certification:

- A fishmonger serving final consumers and caterers.
- A seafood company with a trading office, processing facility and storage unit.

When Chain of Custody certification is not needed:

- 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.
- 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.
- 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.

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 Fisheries Standard or the ASC Farm Standard.

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 a quote. The total cost for full certification service is likely to include travel costs, audit fees and possibly other charges. Make sure you get a long-term picture of the cost structure. The MSC and 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 traceability. The Chain of Custody 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 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 learn) about the requirements. It is important to keep records of your staff training program. Check with your local MSC office for training material in your local language.

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The MSC and ASC have produced a training video that can be used by companies to help train their staff on Chain of Custody certification: visit [msc.org/en-us/coc-training](https://www.msc.org/en-us/coc-training)

Pre-audit checklist and making changes to your operations

Use the [MSC pre-audit checklist](#) to determine how much of the Chain of Custody Standard your company already meets and if you need to adjust your operations.

If you need to include new processes, procedures and systems to meet the Standard make sure these are working before your audit. Even if no changes were made, it's a good idea to conduct a practical, on-site check before scheduling an audit, as this will help avoid non-conformities being raised.

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.



DOWNLOAD MSC CHAIN OF CUSTODY
PRE-AUDIT CHECKLIST AT:

www.msc.org/docs/coc-pre-audit-checklist-V2



Step 3 The audit

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

Audit location

Most audits will take place on-site at your company's premises and will be repeated for every site included in the certificate.

Initial audits can be conducted remotely if companies or sites meet both the following criteria:

- Companies do not subcontract others in handling their certified products.
- There are no other heightened risk factors that would justify an on-site audit.

Audit duration

The duration of the audit will vary depending on the size of your company, the complexity of your operations and the number of certified species you intend to buy and sell as certified.

The MSC/ASC does not set a minimum audit duration, except for companies that:

- are a processor or contract processor
- are located in a country with a transparency score of below 41 according to the latest Corruption Perception Index (*Check your country's score on Transparency International's latest Corruption Perception Index at www.transparency.org/research/cpi)
- handle both certified and non-certified seafood
- purchase more than 5,000 MT of seafood or more than 20 seafood batches per year (both certified and non-certified).

For companies that meet all the above criteria, the MSC sets a minimum audit duration of 12 hours on-site, spread over two working days.

GOOD TO KNOW

It's common for companies to have not bought any certified seafood by their initial audit. In this case, the auditor looks at similar products to evaluate the measures you have in place to identify, segregate and trace seafood.



Audit process

The audit begins with an opening meeting, during which the auditor confirms your company's eligibility to continue in the audit process, the audit plan, and the scope of the audit (the products and activities to be audited), the type of documentation for review, and visits to subcontractors or other sites where relevant. In addition to your appointed Chain of Custody contact person, we recommend inviting other relevant members of staff to this meeting.

Use the opening meeting to clarify any questions you have regarding your audit or the certification process.

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 15 for more information.
- Non-certified ingredients used have been correctly calculated (where applicable).
- Your Labour Risk Score and whether a labour audit is required.

Review

- The management system/s for each activity in scope (for example trading, distribution, processing).
- The content and implementation of written procedures (for example protocols for maintaining segregation, 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.

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 traceability).

Verify

- Your company 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.

Traceability tests

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

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

Your auditor will send you a summary of all audit findings within 10 working days that will detail any non-conformities.

Non-conformities

An auditor can raise a non-conformity when they find a deviation from any of the requirements in the Chain of Custody Standard. You will be given a specified timeframe to review the findings and decide how to address them.

	Required actions
<p>Minor non-conformities</p> <p>Where your company does not comply with the Chain of Custody Standard, but the integrity of the chain of custody is not jeopardised.</p>	<p>Send the certification body an effective action plan proposing corrective actions and timeframes to implement them.</p> <p>Your company will not be certified until the action plan has been sent and reviewed by the certification body as effective.</p>
<p>Major non-conformities</p> <p>Where your company does not comply with the Chain of Custody Standard, and the integrity of the chain of custody is jeopardised.</p>	<p>Send the certification body an effective action plan with root cause analysis, corrective actions and timeframes to address them, in order to close the non-conformity within 90 days of the initial audit.</p> <p>If this cannot be done, your company will need to have another initial audit.</p>

Examples of non-conformities

If your auditor finds your staff show insufficient knowledge and understanding of their role related to the Chain of Custody Standard that could compromise product integrity.

If your auditor finds you have not complied with the requirements on forced and child labour.

GOOD TO KNOW

If your staff do not know how to tell apart certified from non-certified seafood, this is likely to lead to a non-conformity. Using labels, codes, and markings to help differentiate them are ways of maintaining the chain of custody.

Determining certification

Your certification body must decide if they 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 its accuracy. Your certification body will then upload information to the MSC or 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.

Understanding your Chain of Custody certificate:

- **Certificate scope:** Your certificate's scope will include the certified species handled and the activities carried out in relation to certified seafood. Scope activities are defined in a table at the end of this guide.
- **Products in scope:** Not all your seafood products need to be MSC/ASC certified to proceed with Chain of Custody certification.
- **Sites in your certificate:** Every location that is taking physical possession or legal ownership of certified product must be included in the certificate. These locations (facilities, plants, warehouses, offices) are called sites in the Standard.
- **Certificate types for the Default Standard:**
Certification of one site is called a single-site certificate.
Certification of more than one site is called a multi-site certificate.



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

The MSC and ASC labels are an effective tool to communicate sustainability to seafood consumers. 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 while your company is applying for certification or after your first audit. This enables your company to acquire high-definition files of the MSC label 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 or 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.

Surveillance audits

Surveillance audits are annual. This can be changed to every 18 months if **any** of the following criteria are met and no other heightened risk factors are identified:

- All seafood handled is certified.
- Your company or site acts only as a trader (buying/selling) of certified products.
- Certified seafood is handled only in sealed boxes or containers and is not repacked, processed or altered in any way.

Surveillance audits can be conducted remotely if **all** of the following criteria are met:

- Your company or site acts only as a trader (buying/selling).
- The country of operation has a transparency score above 41 according to the latest Corruption Perception Index.
- No other heightened risk factors are identified.

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.

Scheduling surveillance audits

Surveillance audits should be scheduled 12 or 18 months from the certification date and they can be conducted 90 days before or after the audit due date giving you flexibility to schedule a date that's convenient.

Non-conformity at surveillance

During the surveillance audit, the auditor may raise a non-conformity when there is a deviation from the Standard. In this case, your company is required to take the following actions:

Minor non-conformities	Major non-conformities
<p>Must be addressed by the next scheduled audit.</p> <p>If the auditor finds the same minor non-conformity at the next audit, it will become a major non-conformity.</p>	<p>You must send the certification body an effective action plan with root cause analysis, corrective actions and timeframes to close out or downgrade the non-conformity within 30 days of the audit.</p> <p>If this cannot be done, your certificate will be suspended.</p>

Requirements on forced and child labour

Please note that for the requirements on forced and child labour any major non-conformities must be addressed. They cannot be downgraded. 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.

Certificate suspension

The non-conformity grading system gives your company warnings and opportunities to implement improvements to avoid a certificate suspension. If there have been breaches of product integrity or the chain of custody, your certificate could be immediately suspended.

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

- There is a demonstrable break in the chain of custody caused by the company's actions or inactions.
- The company has sold non-certified seafood as certified.
- The company cannot prove that seafood sold as certified is in fact certified.
- The company has not addressed a major non-conformity within the specified timeframe.
- The company does not agree to a surveillance or re-certification audit within the necessary timeframes.
- MSCI or ASCI has withdrawn a company's licence agreement and the company has not complied with the instructions in the given timeframe.
- The company does not comply with the MSC third-party labour requirements and do not inform your auditor within 2 days.

From the day of suspension, product cannot be sold as certified and you must inform your customers in writing within four days of your suspension.

For a suspension to be lifted within 30 days, 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.

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 from a new certified 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).
- Change certification body.
- Complain about your auditor or certification body.

Request written approval from your certification body if you plan to:

- Undertake a new activity that is not already in your certificate's scope.
- 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).
- Add a new site to your certificate. Adding a new site to the certificate requires a full initial audit of the new site.
- Handle under-assessment fish.
- Change a site address or company name.

Table 1: 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. (there are also scope sub-categories for trading fish meal and trading fish oil).

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

	Default Version	Consumer-Facing Organisation Version	Group Version
Who is it for?	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.
Record keeping	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.
Audit frequency	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.
Non-conformities at audits and suspension rules	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.
Internal audits and reviews	No internal auditing requirements.	Optional internal audits.	Mandatory internal audits and reviews.
Training	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
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)

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/aquaculture-stewardship-council

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The guide relates to the Chain of Custody Standard: Default Version. 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.