

Get Certified!

Your guide to the MSC Chain of Custody certification process

Consumer-Facing Organization version: For retailers, restaurants, caterers and fresh fish counters of any size looking to sell MSC certified seafood directly to final consumers

Contents

Welcome	3
Eligibility for certification	4
The certification process	5
Step 1: Getting started	6
Step 2: Preparing for the audit	8
Step 3: The audit	9
Step 4: After the audit	12
Step 5: Using the trademarks to sell certified seafood	13
Maintaining certification	14

Disclaimer: All details within this document are accurate at the time of publication. It is important to note that this is a supporting document only, and if any interpretive issues arise in relation to the content covered in the publication, the text of the English documents will prevail in all instances.



Welcome

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

The MSC Chain of Custody Standard (Consumer-Facing Organization version) has five principles:

MSC Chain of Custody Standard (Consumer-Facing Organization version)

I Principle 1:
Certified products are purchased from certified suppliers

II Principle 2:
Certified products are identifiable

III Principle 3:
Certified products are segregated

IV Principle 4:
Certified products are traceable and volumes are recorded

V Principle 5:
The company has a management system



Contact your local MSC
office at msc.org

Tip



We recommend that whoever will be responsible for introducing and maintaining certification in your company reads through this guide and the **MSC Chain of Custody Standard**.

Your company may have the systems in place to meet the principles of the standard. However, sections of this guide will still be useful to make the certification process smoother and more predictable.



Access the MSC Standard
msc.org/standards-and-certification

This MSC 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.

Eligibility for certification

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

The basis of the Consumer-Facing Organization version is that your seafood is exclusively or primarily (in volume or value) sold to final consumers. This applies to restaurants, caterers, and retailers with fresh fish counters.

Businesses with more than one site are eligible for Consumer-Facing Organization certification if all of the following are met:

- ✓ All sites are under the control of the same management system that your company's head office maintains
- ✓ Your head office has an ownership or franchise relationship with each site, or a temporary right to manage all sites and staff
- ✓ Your head office controls seafood purchases, ensuring all sites can only order seafood from certified suppliers

Businesses that process and repack product are eligible for Consumer-Facing Organization certification if all of the following are met:

- ✓ Processing and repacking are done exclusively for your company
- ✓ Contract processors or repackers are independently certified and have their own chain of custody certificate

An example of business eligible for consumer-facing organization certification: A catering company provides foodservice on trains. The company's head office purchases certified sustainable tuna from a certified supplier. The company owns and runs a packing site, which only packs for facilities they provide foodservices to.

Businesses that are not eligible for chain of custody certification

- ✗ A company that has been successfully prosecuted for a forced labor violation in the last two years
- ✗ A company whose certificate was withdrawn for a breach of chain of custody in the last two years

When chain of custody is not needed

- ✗ If your company buys pre-packed certified products that will be sold to the end consumer without being opened, re-packed or re-labeled (these are known as 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 is broken and your customers may not make any claims about the product being certified either

Note: if you buy packaged products with any of the MSC's trademarks, you do not need to re-pack them, but you may not actively sell them as 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 products and therefore can be covered by your customer's chain of custody certificate as a subcontractor

The MSC's trademarks

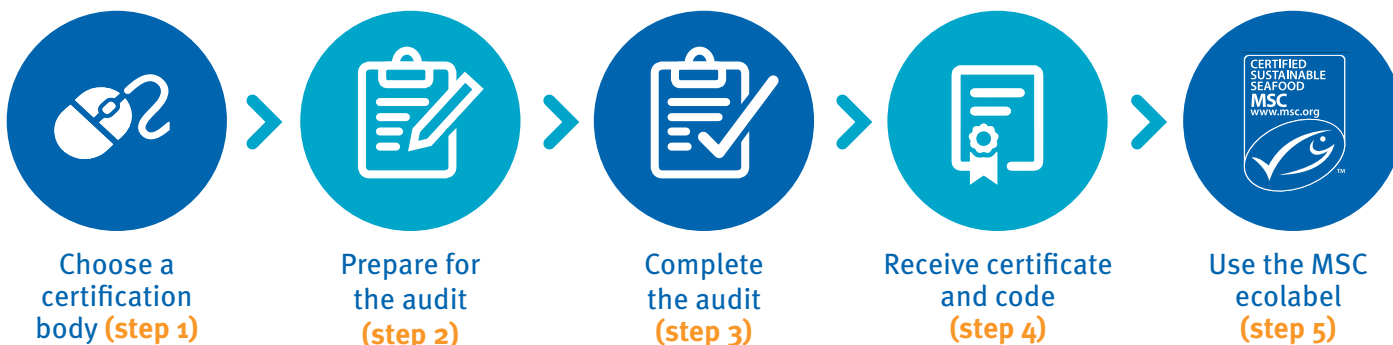


- The acronym "MSC"
- The name "Marine Stewardship Council"
- The MSC ecolabel

Using these trademarks on any materials seen by end consumers or business customers requires permission from the MSC. See [page 13](#) for further information.



An overview of the main steps to getting certified:



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, typically an individual with traceability auditing expertise, to conduct the audit. The auditor will become your most frequent contact throughout the certification process.

The MSC certification process is similar to other international certification programs, such as those recognized by the Global Food Safety Initiative. If you already have audits for other programs (for example organic certification) it is worth checking with your certification body to see if they can introduce the MSC Chain of Custody audits into your auditing schedule.

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



Step 1

Getting started

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 MSC contact person will liaise with the certification body and should familiarize themselves with this guide and the MSC Chain of Custody Standard.

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 to conduct the audit.

The first step is to choose a certification body that operates where your company is based. All certification bodies listed have been approved by an independent organization (Accreditation Services International, ASI).

We recommend that you approach more than one certification body for comparative 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 or adding sites. Make sure you get a longer term picture of the cost structure. The MSC cannot influence the cost of certification, nor does MSC receive any portion of this payment.

In order to quote appropriately, the certification bodies that you contact will likely send you an application form to ascertain:

- Whether your company meets the eligibility criteria for the Consumer-Facing Organization version of the standard
- Your company's risk level
- Which seafood species you want to buy and sell as certified
- What activities you do with the certified seafood (see the scope activity definitions table below)
- Whether you have any certified suppliers
- Where your company is based, and out of how many locations (sites)
- Whether your company has more than one site, which of these perform operations (e.g. storage warehouse or central kitchen) and which sell/serve to the final consumer (e.g. restaurant)
- Whether you intend to use subcontractors to process, pack or repack certified seafood

Once you accept a quote, the chosen certification body will send you a contract that includes elements specific to their business as well as some specified by the MSC.



Find an accredited certification body at msc.org/for-business/certification-bodies

Certificate scope



The certified species bought and the activities carried out in relation to certified seafood will be referred to as your certificate's "scope". See the scope activity definition table.

Products in scope



Not all your seafood products need to be MSC certified to proceed with chain of custody certification. Only items listed in your scope will be audited.

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.

Scope activity definitions: Your company's operations will be classified according to the definitions below

Trading fish (buying/selling) This is likely applicable to all companies, except for subcontractors that do not buy product	Storage Product held in a storage area	Distribution Companies that receive sealed containers, pallets, etc. and deliver them to customers or other members of their group	Wholesale Companies that receive sealed containers, pallets, etc. and sell them 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 product owner (does not legally own the seafood)	Use of contract processor Any certificate holder that uses a 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 audit can be simple and straightforward, if you have a clear plan of what needs to be done, by whom, and by when.

Step 2

Preparing for the audit

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 MSC Standard**. The standard defines "responsible personnel" as those who ensure the organization's conformity with chain of custody, and 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.

Site list

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

- A designated contact
- Site address
- Whether it is an operations or consumer-facing site (or both)

Your certification body will request this site list before the initial audit so they can calculate the number of sites to visit.

Pre-audit checklist

Use the MSC pre-audit checklist to determine how much of the standard your company currently meets without having to make any changes, and where you need to make adjustments to your operations.

With these adjustments in place, check that the changes have actually been implemented and that new processes, procedures and systems are working in practice. Even if no changes were made, it is a good idea to conduct a practical on-site check before scheduling an audit, as this will help avoid **non-conformities** being raised.

It is also a good idea to inform all relevant staff, sites, suppliers and subcontractors of your company's intention to get certified. Their cooperation will be essential from the start of the process for a successful outcome.

Once you are satisfied that your company is fully prepared you are ready to schedule the audit.

Training staff



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. Also do check with **your local MSC office** for available training material in your local language.



For the MSC pre-audit checklist, please visit msc.org/for-business

Preparation is key



During the audit, the auditor will assess whether your company meets the Chain of Custody Standard. At this stage they cannot offer advice on improvements and if they find your company doesn't meet the standard they will raise a non-conformity. Turn to **page 11** to find out more.

Scheduling your audit



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

The aim of all chain of custody audits is to check whether your company meets (or continues to meet) the MSC Chain of Custody Standard.

Step 3

The audit

At your audit, 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 fulfill 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 central office audits and site visits will take place at the premises.

If your company operates out of more than one site and intends to have multiple sites under the certificate, the auditor will visit the central office, all operation sites that are processing and/or packing, and a sample of consumer-facing sites. The auditor will calculate the number of sites to audit. You can ask your auditor how they are calculated, or refer to table 4 in the [pre-audit checklist](#).



The auditor will do a walk-through of your premises and interview staff.

Audit duration

The duration of the central office audit and site visits will vary depending on whether your company is scored as 'standard risk' or 'low risk' by the certification body. Other factors determining the duration include the complexity of your operations, your activities related to certified seafood, and the number of species you intend to buy and sell as certified.

Your certification body will assign your company a risk score during the audit planning stage, which is based on the number of sites, the number of certified species, and other factors. The risk scoring affects three auditing elements as seen in the table below, of which the first two affect the time your auditor requires on-site.

Risk-based auditing elements

Audit element	Low risk	Standard risk
Whether seafood samples are collected at audit for the purposes of DNA testing	Not collected	Collected at surveillance and recertification audits (not at initial audits)
How many traceability tests are conducted (from the point of sale back to the certified delivery)	One traceability test per consumer-facing site visited	Two traceability tests per consumer-facing site visited
Percentage of site visits conducted at short notice (no more than 48 hours advance notice of which sites are going to be visited)	10% or a minimum of 1 site if fewer than 10 are visited	100% of sites visited (unless short notice access is impossible)

Good to know



The audit can still be conducted even if your company has not yet bought certified seafood, which is often the case at initial audits. Instead, the auditor will look at similar products to evaluate the measures in place to identify, segregate and trace.

Audit process

The audit begins with an opening meeting, during which the auditor confirms your company's eligibility to continue in the chain of custody process, the audit plan, the certificate's scope, the type of documentation for review, subcontractor site visits where relevant, and your company's risk score.

In addition to your appointed MSC contact person, we recommend inviting a few other members of staff to this meeting, as relevant.

During the audit, the auditor will:

Check	Review
<input type="checkbox"/> The measures taken to segregate, identify and prevent mixing between certified and non-certified seafood, and/or between different program that shares chain of custody (such as ASC)	<input type="checkbox"/> The management system/s for each activity in scope (for example retail to consumer, storage)
<input type="checkbox"/> Adequate systems are in place with subcontractors to identify certified products at point of receipt and dispatch	<input type="checkbox"/> The records showing purchase, receipt and physical handling of certified species
<input type="checkbox"/> Information given or seen documented at the central office with procedures, records and workflows seen at site level	<input type="checkbox"/> Non-certified ingredients used have been correctly calculated (where applicable)
	<input type="checkbox"/> The permission to use the trademarks by asking a proof of the signed license agreement and/ or the approved packaging designs. Turn to page 13 to find out more
Interview	Trace
<input type="checkbox"/> At least one responsible personnel at each site visted 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)	<input type="checkbox"/> Any product sold or labeled as certified back to a certified purchase or delivery, including product movement through any operation site. This is called a traceability test.

Once the auditor has completed the above, they will conclude their findings and summarize any **non-conformities**.

All chain of custody audits (initial, surveillance and re-certification) cover the same audit process described here.



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

DNA testing



Your auditor may take small samples of certified seafood for DNA testing, if your company scores as standard risk.

Time limit



The auditor will set a time limit for your company to provide the required records during audit.



The auditor will ask for evidence that seafood your company is selling as certified has come from a certified supplier.



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 is a way of maintaining the chain of custody.

Non-conformities

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

There are two gradings for non-conformities:

Minor non-conformities	Major non-conformities
Where your company does not comply with the MSC Chain of Custody Standard, but the integrity of the chain of custody is not jeopardized .	Where your company does not comply with the MSC Chain of Custody Standard, and the integrity of the chain of custody is jeopardized .

Audit closing meeting

At the end of the audit, the auditor will call a closing meeting to summarize their findings, including any non-conformities, the details and timeframes of any actions that need to be taken before certification can be awarded. 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, see further detail in [page 15](#).

Examples where non-conformities can be raised

- ⊗ If your auditor finds your company has knowingly used vessels listed on Regional Fisheries Management Organization (RFMO) blacklists
- ⊗ If your auditor finds your staff present insufficient knowledge and understanding of their role related to chain of custody that can compromise product integrity



Tip

Use this opportunity to clarify any questions you have regarding the audit findings or next steps.

Your company may need to make appropriate adjustments to be awarded certification.

Step 4 After the audit

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The MSC requires that certification bodies send their clients the completed audit report within 10 days of the audit. This report details any non-conformities raised by the auditor. You will be given a specified timeframe in which to review the findings and decide how to address them.

Required actions for non-conformities raised at the initial audit:

Minor non-conformities	Major non-conformities
<p>Send the certification body an effective action plan with corrective actions and timeframes to address them.</p> <p>Note: your company will not be certified until the action plan has been sent and agreed by the certification body to be effective.</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-out or downgrade the non-conformity within 90 days of the initial audit.</p> <p>Note: if this cannot be done, your company will need to have another initial audit.</p>

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 then update the audit report and send you a finalized version 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 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. You can now officially sell MSC and/or ASC certified seafood.

The audit report and confidential information will not be displayed on the MSC Find a Supplier. The directory is the official source of certificate validity. Companies that do not appear on this directory cannot be used as a certified supplier.



Access the MSC Find a Supplier at
cert.msc.org/supplierdirectory



Step 5

Using the trademarks to sell certified seafood

Your company must sign an Ecolabel License 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 Ecolabel License Agreement may be signed during the time your company is an applicant for certification (before the initial audit). This enables your company to acquire high-definition files of the MSC ecolabel and/or ASC logo to use in packaging design. Aside from signing a license agreement, your company will have to submit the packaging designs and a completed Product Approval Form containing information about the product you intend to sell with the MSC and/or ASC trademarks. This is not necessary if you use the acronym "MSC" and/or "ASC" for business-to-business trading, traceability, identification or internal training purposes.



To consult the cost of using the MSC trademarks please visit msc.org

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

Maintaining certification

Surveillance audits

Surveillance audits are annual for all Consumer-Facing Organization certificates. They can be moved forward or back by three months around the due date so that you and the auditor can schedule a date that is convenient for both parties.

Number of site visits



The number of sites visited at surveillance audits may be different to the number visited at your initial audit. You can ask your auditor how they are calculated, or refer to table 4 in the [pre-audit checklist](#).

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. In this case, your company is required to take the following actions:

Minor non-conformities	Major non-conformities
Must be addressed by the next scheduled audit. Note: if the auditor finds the same minor non-conformity at the next audit, they are likely to raise the grading to a major non-conformity.	Send the certification body an effective action plan with root cause analysis, corrective actions and timeframes to address them, in order to close-out or downgrade the non-conformity within 30 days of the initial audit. Note: if this cannot be done, the certification body may suspend your certificate.

Importantly, any major non-conformities always trigger a follow up site visit within 90 days of the audit. This is so the auditor can check that the action plan has been effectively implemented at the site(s) where the non-conformity was found. If your company has more than six sites included in your certificate, the auditor will visit the site(s) where the non-conformity was detected, plus one other site.

Certificate suspension

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

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

- There is a demonstrable breakdown in the chain of custody caused by the company's actions or inactions
- The company has sold non-certified seafood as certified (an isolated incident of accidental mislabeling or substitution found at audit may only be graded as a major non-conformity, not necessarily cause for suspension)
- The company cannot prove that seafood sold as certified is in fact certified
- The number of major non-conformities has exceeded the threshold (ask your auditor to show how this was calculated)
- The auditor has raised a major non-conformity against the same clause during a follow up visit
- The company has not addressed a major non-conformity within **30 days**
- The company does not agree to surveillance or re-certification audit within the necessary timeframes
- The MSC has suspended or withdrawn a company's license agreement and the company has not complied with MSC instructions in the given timeframe

Regardless of the cause, from the day of suspension product cannot be sold as certified and your company cannot make any claims regarding certification.

For a suspension to be lifted, a corrective action plan must be submitted, and is subject to acceptance by the certification body.

Non-conforming product procedure



A certificate suspension is distinct from the non-conforming product procedure – where your company finds mislabeling and reports it to the certification body. By following this procedure to report and deal with problems found by your company, the certification body will not suspend your certificate, unless it becomes recurrent.

Important 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 labor in the last two years.

Staying in touch with your certification body

Although the majority of communication with your auditor and/or certification body will relate to your audit, there are other instances when you will need to contact them, as summarized here:

- Finding non-conforming product (inform within 2 days)
- Adding a new certified species (inform within 10 days)
- Buying certified product from a new supplier (inform within 10 days)
- Appointing new staff as your MSC contact person (inform within 10 days)
- Changing certification body
- Complaining about your auditor or certification body

Inform your certification body

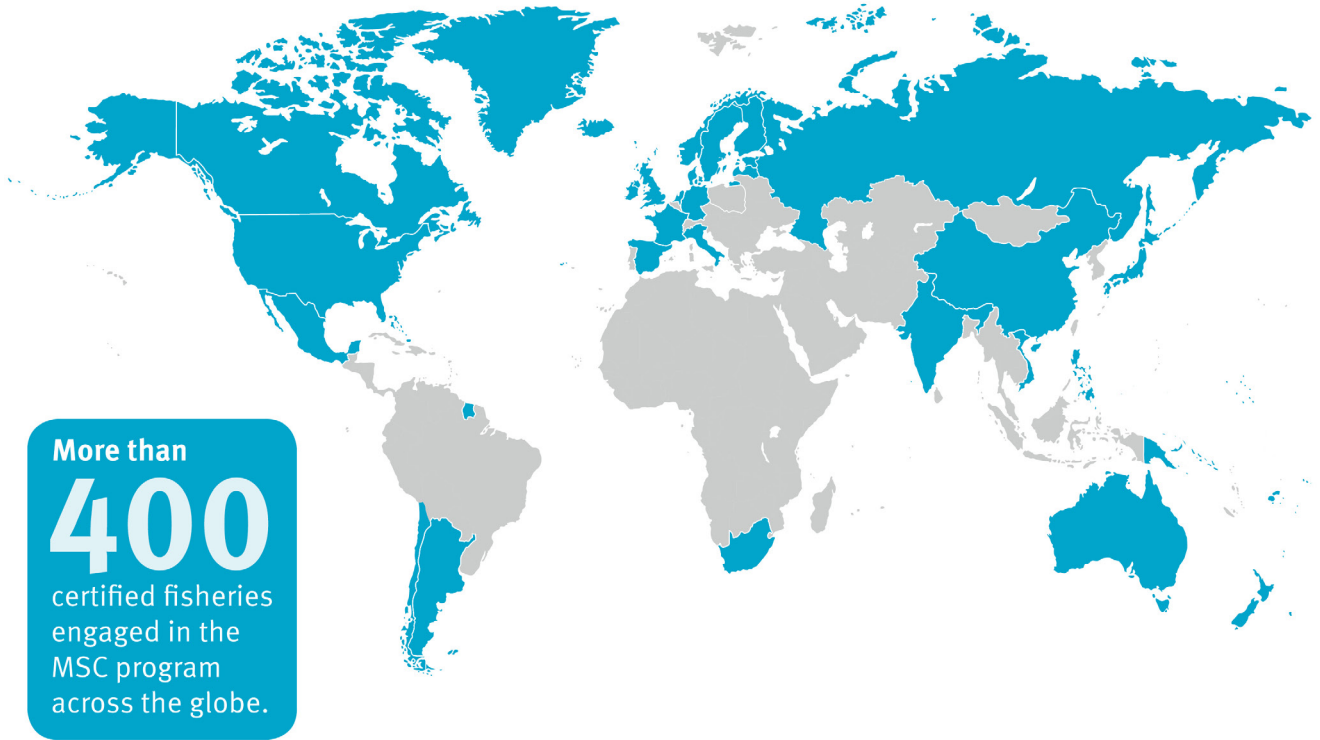
- Undertaking a new activity that is not already in your certificate's scope
- Using a new contract processor or packer for certified seafood
- Buying product certified to a program that shares MSC Chain of Custody (e.g. ASC)
- Adding more than 50% of new sites to your certificate

Request approval from your certification body



During your certification period, you can add any new certified species into your certificate scope at any time. All you need to do is inform your certification body within 10 days of receipt.

Countries where fisheries are engaged in the MSC program



Get in touch:

www.msc.org
info@msc.org



@MSCbluefish



/MSCbluefish



[/sustainableseafood](#)

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