



Get Certified!

Your guide to the MSC Chain of Custody certification process

Group version: For organisations with a central office function and many locations distributing, processing or trading certified seafood such as co-operatives, franchises and vertically-integrated companies

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	10
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 scheme documents will prevail in all instances.

Join the international seafood community that proudly support sustainable fisheries certified to the Marine Stewardship Council (MSC) Fisheries Standard. Together we can protect the world's fish stocks for the future.

Welcome

© Janice Skinner LLB

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.

 Contact your local MSC office at [msc.org/contact](https://www.msc.org/contact)

The MSC Chain of Custody Standard (Group version) has six principles:

MSC Chain of Custody Standard (Group 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

VI Principle 6:
Specific requirements for groups

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/coc/standard](https://www.msc.org/coc/standard)

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 **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](#).

The basis of the Group version is that internal controls are effective, and therefore only a sample of sites handling or trading certified seafood need to be audited. This is more efficient than each site being audited in terms of certification costs. 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 and decisions made by relevant parties.

 Companies operating 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.

 Companies operating at the end of the supply chain, where a third party certificate 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 that are not eligible for chain of custody certification

 A company that has been successfully prosecuted for a forced 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

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-labelled (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 15](#) 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 schemes, such as organic and those recognised by the Global Food Safety Initiative. If you already have audits for other schemes (for example, British Retail Consortium or Global Gap) 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 representative will liaise with the certification body and is responsible for ensuring the group's conformity with 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 organisation (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:

- Which seafood species you want to buy and sell as certified
- What activities you do with the certified seafood as per 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 you intend to use subcontractors to process, pack, transport or store certified seafood
- Whether you handle both certified and non-certified species

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.

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

<p>Trading fish (buying/selling)</p> <p>This is likely applicable to all companies, except for subcontractors that do not buy product</p>	<p>Storage</p> <p>Product held in a storage area</p>	<p>Distribution</p> <p>Companies that receive sealed containers, pallets, etc. and deliver them to customers or other members of their group</p>	<p>Wholesale</p> <p>Companies that receive sealed containers, pallets, etc. and sell them to customers or other members of their group</p>	<p>Packing/ repacking</p> <p>When the packaging is changed but the product remains the same</p>
<p>Processing</p> <p>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 way to consumer')</p>	<p>Contract processing</p> <p>Any certificate holder that carries out processing on behalf of the product owner (does not legally own the seafood)</p>	<p>Use of contract processor</p> <p>Any certificate holder that uses a contract processor to process, repack or transform certified product on their behalf</p>	<p>Retail to consumer</p> <p>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</p>	<p>Restaurant/ take away to consumer</p> <p>Any foodservice situation where the product is prepared on-site and sold directly to consumers</p>



Find an accredited certification body at msc.org/cabs

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.

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 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 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.



Make sure you check which sites need to be included in the certificate.

Site list

Your site list shows the sites you want to include in your Group certificate, which 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 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 15](#).

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 msc.org/coc/pre-audit-checklist-group



© Magnus Sandberg

Internal audit

With these adjustments in place, 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 the changes 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 internal audit:

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

Any non-conformities identified by your internal auditor must be corrected before the initial (external) audit. The grading of non-conformities, and their close-out timeframes are detailed in the [pre-audit checklist](#). Once your company is fully prepared you can schedule your audit with your certification body.

Internal auditor



Your internal auditor can be anyone with knowledge of the standard, and who is capable of objectivity in audit and decision-making.

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, 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.

All chain of custody audits (initial, surveillance and re-certification) cover the same audit process, with the aim 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 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. Refer to tables 3 and 4 in the [pre-audit checklist](#) to see this in detail.

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.

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, site audits, and visits to subcontractors where relevant. The auditor will set a time limit for your company to provide any necessary records.

In addition to your appointed MSC representative, 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.

DNA testing



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

During the audit, the auditor will:

Check	Review
<ul style="list-style-type: none"> <input type="checkbox"/> The measures taken by your company and any subcontractors to segregate, identify and prevent mixing between certified and non-certified seafood <input type="checkbox"/> The permission to use the trademarks by asking a proof of the signed licence agreement and/ or the approved packaging designs. Turn to page 13 to find out more <input type="checkbox"/> Non-certified ingredients used have been correctly calculated (where applicable) 	<ul style="list-style-type: none"> <input type="checkbox"/> The management system/s for each activity in scope <input type="checkbox"/> The content and implementation of written procedures (i.e. approved buying lists, training manuals) <input type="checkbox"/> The contract processing of certified seafood for others (if applicable) <input type="checkbox"/> The records showing purchase, receipt, sale and physical handling of certified species <input type="checkbox"/> The group controls, schedule and internal audit outcomes
Interview	Verify
<ul style="list-style-type: none"> <input type="checkbox"/> 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) 	<ul style="list-style-type: none"> <input type="checkbox"/> Your company and any subcontractor's records, where relevant: <ul style="list-style-type: none"> • 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

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.

Non-conformities

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

There are three gradings for non-conformities:

Non-conformities



Minor and major non-conformities found at sites will also be raised with the same grading against the central office.

	At site audits	At the central office audit
Minor non-conformities	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
Major non-conformities	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
Critical non-conformities	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

Examples where non-conformities can be raised

 If your auditor finds your staff present insufficient knowledge and understanding of their role related to chain of custody that can compromise product integrity.

 If your auditor finds your company has knowingly used vessels listed on Regional Fisheries Management Organisation (RFMO) blacklists



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.

Audit closing meeting

At the end of the audit, the auditor will call a closing meeting, most likely involving everyone who attended the opening meeting. This meeting allows the auditor to summarise the findings, including any non-conformities, any actions that must be taken and their timeframes 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 changes to the certificate (for example, adding a new site, see further detail in [page 15](#)).

Tip



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

Contents ← →

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

Step 4 After the audit

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 for both site and central office audits :

Minor 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 your certification body to be effective.</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, in order for the certification body 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>
Critical non-conformities	<p>Must be corrected before certification can be granted.</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 finalised 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 msc.org/suppliers



The MSC ecolabel is an effective tool to communicate sustainability to seafood consumers. If you wish to use the MSC trademarks, you will need an ecolabel licence.

© MSC

Step 5

Using the trademarks to sell certified seafood

Your company must sign an Ecolabel 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 Ecolabel Licence Agreement may be signed whilst 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 licence 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/ecolabel

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

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 Group version of the MSC Standard, 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. These internal 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. Find out more using the [MSC pre-audit checklist](#).

Surveillance audits

Surveillance audits are annual for all Group 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’s convenient for both parties.

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:

Site visit



The number of sites to be visited at the surveillance audits is the same or fewer than at the initial audits. Check against tables 3 and 4 in 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 surveillance 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.

	At site audits	At the central office audit
Minor non-conformities	Must be corrected within 12 months (by the next audit). Note: If the auditor finds the minor non-conformity has not been corrected by the next audit, they may raise the grading to a major non-conformity.	Must be corrected within 90 days . Note: If not corrected within this timeframe, the non-conformity will be re-graded as a major against the central office.
Major non-conformities	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 30 days of the audit. Note: If this cannot be done, the site must be suspended from the Group certificate.	Must be corrected within 30 days . Note: If not corrected within this timeframe, the non-conformity will be re-graded as a critical against the central office and the group suspended.
Critical non-conformities	The site must be suspended immediately from the Group certificate until the non-conformity has been addressed.	The Group certificate will be suspended immediately.

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:

- 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 surveillance or re-certification audit within the necessary timeframes
- The MSC has suspended or withdrawn a company's licence 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 you must inform your customers in writing of your suspension.

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 mislabelling 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 labour 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 summarised 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 representative (inform within 10 days)
- Adding up to 10% of new sites to the Group certificate (include an updated site list)
- Changing certification body
- Complaining about your auditor or certification body

Inform your certification body

- Adding more than 10% of new sites to the Group certificate (provide evidence that the sites comply with standard)
- Undertaking a new activity that is not already in your certificate's scope (at central office or site level)
- Using a new contract processor or packer for certified seafood
- Buying product certified to a scheme that shares MSC Chain of Custody (e.g. ASC)

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.

