

# MSC Chain of Custody Standard: Group Version



**Version 2.0, 28 March 2019**

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The MSC prohibits any modification of part or all of the contents in any form.

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## Responsibility for this Standard

The Marine Stewardship Council (MSC) is responsible for this Standard.

Readers should verify that they are using the latest copy of this and other related documents. Updated documents, together with a master list of all available MSC documents, can be found on the MSC website ([msc.org](http://msc.org)).

### Versions published

Version no.	Date of publication	Description of amendment
1.0	20 February 2015	First publication.
2.0	28 March 2019	Major review of CoC Group Standard. Inclusion of new requirements on labour practices (on-shore), and other substantive and non-substantive changes.

## About the Marine Stewardship Council

### Vision

Our vision is of the world's oceans teeming with life, and seafood supplies safeguarded for this and future generations.

### Mission

Our mission is to use our ecolabel and fishery certification program to contribute to the health of the world's oceans by recognising and rewarding sustainable fishing practices, influencing the choices people make when buying seafood, and working with our partners to transform the seafood market to a sustainable basis.

## About this document

This document contains mandatory requirements for supply chain organisations seeking MSC Chain of Custody (CoC) certification. Non-mandatory guidance has been developed to help interpret and apply the requirements in this Standard.

## General introduction

### Chain of Custody certification

CoC certification provides credible assurance that products sold with the MSC ecolabel or trademarks originated from a certified fishery and can be traced throughout the supply chain to a certified source. Organisations certified against the CoC Standard are audited by a third-party accredited certification body, and are subject to periodic surveillance audits over the three-year period of a CoC certificate.

### Use of the MSC Chain of Custody Standard by other standard-setting organisations

The CoC Standard is made available for use by selected organisations that operate certification schemes. At the time this Standard was issued, the Aquaculture Stewardship Council (ASC) has elected to use the CoC Standard for all certified seafood products originating from ASC-certified farms. This allows supply chain organisations to handle both MSC certified and ASC certified seafood with a single CoC audit, although separate CoC certificates are issued, and each standard has distinct trademarks. If other certification schemes choose to also use the CoC Standard in the future, this information will be published on the MSC website.

## Scope and options for Chain of Custody certification

Any organisation trading or handling products from a certified fishery or farm is eligible to have CoC certification. CoC certification is a requirement for each organisation in the supply chain taking legal ownership of certified products that wishes to make a claim on the certified source, up until the point where products are packed into consumer ready tamper proof packaging.

The MSC owns the MSC Chain of Custody Standard: Default Version and two variants: the MSC Chain of Custody Standard: Group Version and the MSC Chain of Custody Standard: Consumer-Facing Organisation Version. Further information on eligibility for each variant can be found in [Section 6.2](#) of the MSC Chain of Custody Certification Requirements and in the introduction to each document.

### Scope of MSC Chain of Custody Standard: Default Version

This Standard is applicable to any organisation that has a single site (physical location) handling or trading certified products. The MSC Chain of Custody Standard: Default Version (CoC Default Standard) is also applicable for any organisation that has numerous sites handling certified products, but where each site is individually audited against the CoC Default Standard. In this case a single certificate will be issued, called a multi-site certificate. Examples of organisations that might be certified against the Default CoC Standard include a single site trading organisation, or a processor with several factory locations.

Some requirements of the CoC Default Standard, such as purchasing from certified suppliers, may not apply where the organisation is a farm or a fishery.

### Scope of MSC Chain of Custody Standard: Group Version

The MSC Chain of Custody Standard: Group Version (CoC Group Standard) applies to any organisation handling certified products at many sites, where each site is not individually audited by the Conformity Assessment Body (CAB). This can be more efficient than multi-site certification for organisations with many sites, or groups of organisations that join together. The organisation designates a central office function that establishes internal controls and is responsible for ensuring

that every site complies with the CoC Group Standard. The CAB audits the central office and a sample of sites, rather than auditing every site. A single CoC code and certificate are shared across the group. Examples of organisations that might be certified against the CoC Group Standard include a large wholesaler with many warehouse locations, or a restaurant chain (having decided not to be certified against the CoC CFO Standard).

Some clauses of the CoC Group Standard, such as purchasing from certified suppliers, may not apply where the organisation is a farm or a fishery.

### Scope of MSC Chain of Custody Standard: Consumer-Facing Organisation Version

The MSC Chain of Custody Standard: Consumer-Facing Organisation Version (CoC CFO Standard) applies to any organisation that serves or sells seafood to the final consumer and meets other specific eligibility criteria. Consumer-facing organisations (CFOs) such as retail or foodservice can be single sites or have numerous locations, and a single CoC code is issued for all sites under the organisation's management system that handle or trade certified products. Similar to the CoC Group Standard, the CAB audits a sample of the total number of sites in the certificate. Examples of CFOs include restaurants, restaurant chains, fishmongers, retailers with fish counters, and caterers.

## Eligibility for MSC Chain of Custody Standard: Group Version

Organisations are eligible to be certified against the Group version of the CoC Standard only if all the following criteria are met:

- a. The proposed group's central office is a legal entity with whom a contract can be made.
- b. All sites undertake substantially similar activities as defined by MSC Chain of Custody activities, or if they do not, the group can be stratified for sampling.
- c. The entire group operation is within a single geographic region, or if they are not, the group can be stratified for sampling.
- d. The same written language is used at all sites and can be read by all site managers, or if translations are provided, adequate document control procedures are in place to ensure version consistency across different languages.
- e. The proposed group's central office is capable of objectivity in audit and decision making.
- f. The proposed group's central office can demonstrate through their application an understanding of the CoC Group Standard such that it is likely that they will be able to qualify for certification.

**Note:** Some organisations will be eligible to use the Default, Group and/or CFO version of the CoC Standard. Organisations are advised to check their eligibility against all CoC certification options (i.e. Default, Group, CFO) available in in [Section 6.2](#) of the MSC Chain of Custody Certification Requirements before discussing the best option with their CAB.

## Effective date

The effective date for version 2.0 of the CoC Group Standard is 28 September 2019. All audits against the CoC Group Standard that start on or after this date shall use this version.

## Review date

The MSC welcomes comments on this Standard. Comments will be considered as part of the next review process. Reviews will take place at least every five years. Please submit comments to [standards@msc.org](mailto:standards@msc.org).

More information about the MSC policy development process and the MSC Standard Setting Procedure can be found on the MSC website ([msc.org](http://msc.org)).

## Normative documents

The documents listed below contain provisions that, through reference in this text, become part of this Standard. For documents listed, the latest published edition of the document applies.

- a. MSC Chain of Custody Certification Requirements.
- b. MSC-MSCI Vocabulary.
- c. MSC Third-Party Labour Audit Requirements.
- d. CoC Certificate Holder Statement of Understanding of Labour Requirements .
- e. MSC ecolabel user guide.

## Terms and definitions

Concepts, terms and phrases are defined in the [MSC-MSCI Vocabulary](#).

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## MSC Chain of Custody Standard: Group Version

### Principle 1 Certified products are purchased from certified suppliers

- 1.1 The organisation shall have a process in place to ensure that all certified products are purchased from certified suppliers, fisheries, or farms.

#### Guidance 1.1

Certified products refer to any seafood that originates from certified fisheries or farms and is identified as certified.

This excludes seafood products in “consumer ready tamper proof” packaging (i.e. sealed and labelled products that will be sold to final consumers in the same form, such as individual cans of tuna). For a full definition of “consumer ready tamper proof”, refer to [Section 6.1](#) of the MSC Chain of Custody Certification Requirements (CoCCR).

For the purposes of Chain of Custody (CoC), a “supplier” is an entity that is named on the sales documentation that demonstrates transfer of legal ownership from seller to buyer and relates to certified product. In most cases, this proof of purchase will be an invoice, but could also be demonstrated through a contract or deed.

The organisation’s process will need to include verifying that the party which they take legal ownership of the product from has the relevant valid certification. If buying direct from another supplier, this will be a valid CoC certificate. If buying direct from a fishery or a farm, the process needs to include:

- Verifying that the fishery or farm has a valid fishery or farm certificate.
- Checking the fishery assessment or farm audit report and, if the report specifies that the fishery or farm is required to have CoC certification, verifying that the fishery or farm also has a valid CoC certificate.

The certified status of MSC supply chain companies and fisheries can be verified on the MSC website ([msc.org](http://msc.org)), and ASC supply chain companies and farms on the ASC website ([asc-aqua.org](http://asc-aqua.org)). These websites are more accurate than relying on paper certificates, which may be cancelled, suspended or withdrawn before expiring.

- 1.2 Organisations handling physical products shall have a process in place to confirm the certified status of products upon receipt.

#### Guidance 1.2

Documentation received with certified products needs to clearly identify the product as certified. This could include delivery notes, invoices, bills of lading, or electronic information from the supplier. This identification is to help ensure that if a supplier replaces certified seafood with non-certified seafood (e.g. if stock runs out), this will be detected by the receiving organisation.

If a supplier uses an internal system (such as barcodes or product codes) to uniquely identify certified products on documents, the receiving organisation needs to understand the supplier’s description in order to confirm the product is certified.

If associated records do not clearly identify products as certified, it is not sufficient to rely only on physical product labelling (e.g. the MSC or ASC label or CoC code on a box) to confirm the certified status.

If receiving products directly from a certified farm, the process may include testing the products for antibiotics or banned substances which cannot be applied to products at the farm if they are to be sold as certified, based on the requirements of the farm standard.

- 1.3 Organisations with certified products in stock at the time of the initial certification audit shall be able to demonstrate that these products were purchased from a certified supplier, fishery or farm, and comply with all relevant sections of this Standard before they can be sold as certified.

#### Guidance 1.3

Certified products in inventory at the time of initial certification will need to be traceable back to a certified supplier, fishery, or farm as per Principle 4. The organisation will also need to demonstrate that any certified product in inventory is identifiable and segregated as per Principles 2 and 3.

## Principle 2 Certified products are identifiable

- 2.1 Certified products shall be identified as certified at all stages of purchasing, receiving, storing, processing, packing, labelling, selling and delivering, except for sales invoices to final consumers.

#### Guidance 2.1

It is recommended that certified products are identifiable as certified on the physical product as well as on the accompanying traceability records. This can be done by placing a sign or label on the package, container, or pallet.

Organisations can use a variety of methods to identify certified products, including acronyms (e.g. “MSC” or “ASC”), the CoC code, or another internal system of identification.

Where it is impossible or impractical to label physical products (e.g. fish in a defrosting tank) the organisation will need to demonstrate how the product can be linked with associated traceability or inventory records that specify the certified status.

Sales invoices to the final consumer include receipts at restaurants, fishmongers or retail fish counters. These do not need to include identification of certified items, although the certified items will still need to be identified at point of serving (e.g. on the menu or fish counter).

- 2.2 If products are sold as certified, they shall be identifiable as certified on the line item of the related invoice, unless all products on the invoice are certified, except for sales invoices to final consumers.

#### Guidance 2.2

Identifying certified products on the line item of the invoice can be done in a variety of ways; for example, using the acronyms “MSC” or “ASC” in the product description, using the CoC code, or using a unique product code that corresponds to a certified product and that has been communicated to customers.

If all items on an invoice are certified, it is acceptable to only have certified identification (e.g. the CoC code) at the top of the invoice. This requirement aims to help make it clear to a buyer and to the CAB (Conformity Assessment Body) which products on any given invoice were sold as certified. The acronyms “ASC” and “MSC” can be used for traceability and identification purposes without requiring a licence agreement (see 2.4).

- 2.3 The organisation shall operate a system that ensures packaging, labels, menus, and other materials identifying products as certified can only be used for certified products.
- 2.3.1 Certified products shall not be mislabelled by species.

#### Guidance 2.3.1

Scientific or common names may be used. The use of species names which are not aligned with the relevant legislation in the country or countries in which the product is traded is considered mislabelling.

- 2.3.2 Certified products shall not be mislabelled by catch area or origin, where this is identified.

#### Guidance 2.3.2

It is not required to specify catch area or origin on product labels, but where this information is specified, this clause applies. Catch area and origin identification which is not aligned to the relevant legislation in the country or countries in which the product is traded is considered mislabelling.

- 2.4 The organisation shall only promote products as certified or use the MSC or ASC label or other trademarks if it has been granted approval to do so under the terms of the licence agreement ([ecolabel@msc.org](mailto:ecolabel@msc.org)).

#### Guidance 2.4

Use of the acronyms (e.g. “MSC” or “ASC”) or the full name of the standard owner (e.g. “Marine Stewardship Council” or “Aquaculture Stewardship Council”) on products or traceability records in a purely business-to-business nature to identify products is permitted without a licence agreement.

Any other use of the MSC or ASC label or other trademarks requires a licence agreement from MSC, the MSC’s licensing function for MSC and ASC products.

During an audit, the organisation may be asked to show evidence of trademark approval emails received from MSC.

## Principle 3 Certified products are segregated

- 3.1 There shall be no substitution of certified products with non-certified products.

#### Guidance 3.1

This includes products sold as certified that are not eligible to be sold as certified by the farm, based on the requirements of the farm standard. These are non-certified even if from a certified farm.

Annual volume reconciliations of certified purchases (or production) and sales could be used to support verification that substitution has not occurred.

- 3.2 Certified and non-certified products shall not be mixed if the organisation wishes to make a claim about these certified products, except:
- 3.2.1 If non-certified seafood is used as an ingredient in certified products, the organisation shall follow the non-MSC/ASC certified seafood ingredients rules.

#### Guidance 3.2.1

The non-MSC/ASC certified seafood ingredients rules can be found in the [MSC ecolabel user guide](#) or the [ASC logo user guide](#) respectively. These documents can be found on the MSC website ([msc.org](http://msc.org)) or the ASC website ([asc-aqua.org](http://asc-aqua.org)). The rules define where non-certified seafood can be used as an ingredient in certified products and the specific restrictions that apply. The ability

to use non-certified seafood and apply these rules is only relevant for licenced MSC and/or ASC labelled products.

- 3.3 Products certified against different recognised certification schemes that share the CoC Standard shall not be mixed if the organisation wishes to sell the product as certified, unless:

#### Guidance 3.3

This applies to any other standard, such as the Aquaculture Stewardship Council (ASC), that uses the CoC Standard for supply chain traceability.

- a. The organisation has specific permission from MSC, or

#### Guidance 3.3.a

MSC may approve a product with ingredients certified to different schemes (e.g. MSC and ASC) that may then be co-labelled (e.g. include the MSC and ASC label on pack) and have the different ingredients identified to the scheme they are certified to (e.g. MSC salmon, ASC shrimp).

- b. The same product is certified against multiple recognised certification schemes that share the CoC Standard.

#### Guidance 3.3.b

This refers to products which are certified to more than 1 scheme at their origin (e.g. a fishery or farm with MSC and ASC certification).

## Principle 4 Certified products are traceable, and volumes are recorded

- 4.1 The organisation shall have a traceability system that allows:
- a. Any product or batch sold as certified to be traced back from the sales invoice or point of serving to a certified supplier.

#### Guidance 4.1.a

Companies at the end of the supply chain, such as restaurants and fishmongers, are only expected to trace back from the point of serving to customers or sale. Historic traceability of servings or sales to final consumers are therefore not required, but all other traceability steps (e.g. receipts and deliveries to consumer serving sites and handing at non-consumer serving sites) still require historic records as per 5.1.3.

All other companies are expected to trace back from the sales invoice.

- b. Any products identified as certified upon receipt to be traced forward from point of purchase to point of sale or serving.

#### Guidance 4.1.b

4.1.b does not apply if an organisation receives certified material from a supplier but never identifies this as a certified product upon receipt (e.g. if a supplier ships an MSC certified product but the customer did not order it as certified).

Any product identified as a certified item upon receipt needs to be traceable through to final sale or serving, even if it is not eventually sold as certified.

Companies at the end of the supply chain, such as restaurants and fishmongers, are only expected to trace forward from purchase to point of serving to customers at the time it is served. Historic traceability of servings or sales to final consumer are therefore not required, but all other traceability steps (e.g. receipts and deliveries to consumer serving sites and handing at non-consumer serving sites) still require historic records as per 5.1.3.

All other companies are expected to trace forward from purchase to sale.

4.2 Traceability records shall be able to link certified products at every stage between purchase and sale, including receipt, processing, transport, packing, storage, dispatch and/or serving.

4.3 Records of certified products shall be accurate, complete, and unaltered.

4.3.1 Where records are changed, these changes shall be clearly documented including the date and name or initials of the person making the changes.

#### **Guidance 4.3.1**

Where information or records provided by the organisation during audits or other requests is not consistent with information provided at a different point in time, the CAB may issue non-conformities. If records are altered by the organisation to reflect necessary adjustments (such as returned orders), these changes should be clearly recorded.

4.4 The organisation shall maintain records that allow volume calculation of certified product.

#### **Guidance 4.4**

4.4 applies to any product identified as certified or eligible to be sold with the certified trademarks. If seafood is purchased as certified but then converted to a non-certified status (and will never be sold as certified), then records would only need to show the volumes of product that were converted to a non-certified status. Further volume records (e.g. for subsequent processing of non-certified items) do not need to be maintained.

All records should be maintained for three years as per 5.1.3.

4.4.1 Sites selling to or serving the final consumer shall maintain all records of volumes purchased and received.

#### **Guidance 4.4.1**

Records of volumes of products sold or served to final consumers do not need to be recorded

Products sold or served to final consumers need to be traceable at the time of serving (see 4.1.a and 4.1.b).

4.5 If processing or repacking occurs, records shall allow conversion rates for certified outputs from certified inputs over any given batch or time period to be calculated.

4.5.1 Conversion rates for processing of certified products shall be justifiable and accurate.

#### **Guidance 4.5.1**

The intent of this clause is to prevent cases where conversion rates are extremely high or low and could indicate potential for substitution of certified and non-certified product. Normal fluctuations in conversion rates due to product quality, seasonality, processing efficiency, etc. are expected.

To verify cases where conversion rates are potentially allowing room for mislabelled product, the CAB may check records against product specifications, similar products being processed, or the organisation's historical processing records.

4.6 The organisation shall only sell as certified the products covered by its scope of certification.

#### Guidance 4.6

The requirements for changes to scope, which cover new species, activities, or products certified against other recognised certification schemes that share the CoC Standard are given in 5.2.1.c, 5.2.2.a, and 5.2.2.b.

## Principle 5 The organisation's management system addresses the requirements of this Standard

### 5.1 Management and training

- 5.1.1 The organisation shall operate a management system that is effective in addressing all requirements in this Standard.

#### Guidance 5.1.1

The management system includes the systems, policies and procedures used to ensure that the organisation complies with this Standard. The extent of documentation required for the management system may vary, depending on the size of the organisation, the type of activities, the complexity of processes, and the competency of personnel.

For very small or straightforward operations, no written documentation may be needed as long as the responsible staff understand and can implement procedures related to this Standard.

- 5.1.2 The organisation shall ensure that responsible personnel are trained and competent in order to ensure conformity with this Standard.

#### Guidance 5.1.2

"Responsible personnel" refers to individuals within an organisation who are responsible for making decisions or carrying out procedures related to this Standard.

Most organisations will need to conduct some type of training to ensure that employees understand CoC requirements and follow internal procedures to keep certified products segregated, identifiable, and traceable. However, for organisations with simple processes, it may be adequate to provide an employee handbook, instructions, and/or posters in food preparation areas.

- 5.1.3 The organisation shall maintain records that demonstrate conformity with this Standard for a minimum of 3 years, or for the full duration of the certified product's shelf life if longer than 3 years.

#### Guidance 5.1.3

Records that demonstrate conformity with this Standard typically include purchase and sale records of certified products, internal traceability and production records for certified products, and internal procedures or training records. These records may be in hard copy or digital format.

Records of sales and/or servings to the final consumer do not have to be maintained.

- 5.1.4 The organisation shall appoint an individual ("CoC contact person" or "group manager") who will be responsible for all contact with the CAB and for responding to any requests for documentation or information related to conformity with this Standard.

#### Guidance 5.1.4

If the contact person changes, the CAB needs to be notified as per 5.2.1.

## 5.2 Reporting changes

- 5.2.1 The organisation shall inform their CAB in writing or by email within 10 days of the following changes:
- a. New CoC contact person or group manager within the organisation.
  - b. Certified products received from a new certified supplier, fishery, or farm.
  - c. New certified species received.

### Guidance 5.2.1

Notification by email or writing needs to be sent to the CAB within 10 days of receiving a new certified species or within 10 days of receiving the first delivery of certified products from a new certified supplier, fishery, or farm.

As per the [MSC-MSCI Vocabulary](#), “day” is defined as “calendar day” in this Standard unless otherwise stated.

It is not required to notify the CAB in the case that the source fishery that the organisation’s supplier (or their supplier) receives the product from changes.

- 5.2.2 The organisation shall receive written approval from their CAB before making any of the following changes:
- a. Undertaking a new activity with respect to certified products that is not already included in the scope of certification.

### Guidance 5.2.2.a

New activities include for example trading, distribution, secondary processing, and storage. A full list of activities can be found in [Table 4](#) of the CoCCR.

- b. Extending the scope of CoC to sell or handle products certified against different recognised certification schemes that share the CoC Standard.

### Guidance 5.2.2.b

For example, if the current CoC certificate covers only MSC certified products, the organisation would need to receive approval from the CAB before selling ASC certified products as certified.

- c. Using a new subcontractor that does contract processing or repacking of certified products.

### Guidance 5.2.2.c

If the organisation wishes to add a new storage or transport subcontractor, this will need to be updated on the record of subcontractors as per 5.3, but the CAB can be notified at the next audit (no prior approval is needed).

- d. Handling under-assessment fish, if the organisation is part of the client group of a fishery being assessed or the same legal owner as a farm being audited.

### Guidance 5.2.2.d

The client group includes fishing operators within a Unit of Certification or other entities that the fishery client identifies as being covered by and/or able to access the certificate.

## 5.3 Subcontractors, transport and contract processing

- 5.3.1 The organisation shall be able to demonstrate that all subcontractors handling certified product comply with the relevant requirements of this Standard.

- 5.3.2 The organisation shall maintain an up-to-date record of the names and addresses of all subcontractors handling certified products, excluding transport organisations.
- 5.3.3 The organisation shall inform any non-certified contract processors that they will be required to have an on-site audit by the CAB to verify compliance with relevant sections of this Standard prior to use of the contract processor and at least once per year afterwards.
- 5.3.4 If subcontractors are used, the organisation shall have the ability to request certified product records from the subcontractor and to allow the CAB access to certified products at any point in time.

#### Guidance 5.3.4

A signed agreement is not needed for storage or transport subcontractors, provided the organisation has the ability to request records to demonstrate conformity (e.g. receipt and dispatch records) from the subcontracted storage or transport facility.

The organisation needs to also be able to grant the CAB access to the physical certified product at any point in time, even if it is currently being held in off-site third-party storage. If access to the storage site is restricted for any reason, the certified product may need to be taken off-site to be inspected by the CAB if there are product integrity concerns.

- 5.3.5 The organisation shall have a signed agreement with all subcontractors that transform, process, or repack certified products, which covers the following:
- The subcontractor has systems in place to ensure traceability, segregation, and identification of certified products at every stage of handling.
  - The subcontractor will allow the MSC or its designated agents, and the CAB, to have access to the premises and any records related to certified products upon request.

#### Guidance 5.3.5

Signed agreements are needed for any contract processor or repacker, even if these subcontractors have their own CoC certification.

Designated agents may include representatives from other scheme owners such as the ASC or from the MSC's accreditation body.

- 5.3.6 The organisation shall not knowingly ship or receive product transported on, or received from, vessels listed on Regional Fisheries Management Organisations (RFMO) blacklists.

#### Guidance 5.3.6

The intent of this requirement is to help ensure that any certified organisation using subcontracted transport, or receiving certified fish directly, does not use vessels that have been engaged in illegal, unreported, or unregulated (IUU) fishing activity. The RFMOs maintain up to-date-lists of IUU vessels on their websites. Several consolidated lists exist, for example, [iuu-vessels.org/iuu](http://iuu-vessels.org/iuu).

- 5.3.7 Organisations that use contract processors or perform contract processing of certified products shall maintain records of all contract-processed certified products, including:
- Volumes and product details received.
  - Volumes and product details dispatched.
  - Dates of dispatch and receipt.
- 5.3.8 Certified contract processors shall record the name and CoC code for all certificate holders for whom contract processing of certified products has been provided since the previous audit.



## 5.4 Non-conforming product

### Guidance 5.4

Non-conforming product relates to any product that is identified as certified or labelled with MSC and/or ASC trademarks, but cannot be proven to come from a certified source.

It can also include products from a certified farm that are not eligible to be sold as certified by the farm based on the requirements of the farm standard (e.g. apply antibiotics at the farm to a product intended for sale as certified).

Non-conforming product could be discovered internally by staff, or the supplier, or in some cases could be detected based on information received from the CAB, the MSC, the ASC, or other parties.

Where a certified product is ordered but the supplier delivers non-certified product, and this is discovered on receipt and the product is returned, the non-conforming process does not apply.

- 5.4.1 The organisation shall have a process for managing non-conforming product that includes the following requirements:
- a. Immediately cease to sell any non-conforming product as certified, until the certified status has been verified in writing by the CAB.
  - b. Notify the CAB within 2 days of detecting the non-conforming product and provide the CAB with all necessary information to verify the origin of the non-conforming product.
  - c. Identify the reason the product is non-conforming and implement measures to prevent re-occurrence where necessary.
  - d. For any non-conforming product that cannot be verified as coming from a certified source, re-label or repack this product to ensure it is not sold as certified.

### Guidance 5.4.1.d

If the product cannot be verified as coming from a certified fishery or certified farm, it cannot be sold as certified or with MSC and/or ASC trademarks.

- e. If non-conforming product has already been sold or shipped as certified, notify all affected customers (excluding final consumers) within 4 days of detecting the issue.
  - i. This notification shall include the circumstances of the non-conforming product and all details of the affected products or batch(es).
  - ii. Records of notifications as per 5.4.1.e.i shall be maintained.

### Guidance 5.4.1.e

Final consumers affected by non-conforming product do not need to be notified.

## 5.5 Requests for traceability and supply chain assurance

### Guidance 5.5

Designated agents may include representatives from other scheme owners such as the ASC or from MSC's accreditation body.

- 5.5.1 The organisation shall cooperate with all requests from the MSC or its designated agents, or the CAB, for traceability documents or sales and purchase records of certified products.
- 5.5.1.1 Documents shall be provided within 5 days of the request being made.

#### Guidance 5.5.1.1

Financial details may be removed but records need to be otherwise unaltered. Records are to be submitted in English if so requested by the MSC.

If an extension is required, a request can be made in writing to the MSC or its designated agents, and if it is not approved, the original 5-deadline must be met. If data is not submitted to the MSC or its designated agents within specified timeframes, the MSC or its designated agents may request that action be taken by the CAB, including issuing of non-conformities.

- 5.5.2 Organisations shall allow the MSC or its designated agents, or the CAB, to collect samples of certified products from their site for the purposes of DNA and/or other product authentication or conformity testing.
- 5.5.3 Where a product authentication test identifies the product as potentially non-conforming as per 5.4.1, the organisation shall:
- a. Investigate the potential source of the issue.
  - b. Present the CAB with findings from the test and, where non-conformities are found, a corrective action plan to address these non-conformities.
  - c. Cooperate with further sampling and investigation.

#### Guidance 5.5.3

Product authentication may be used to identify species, catch areas, or farm region of origin. Product authentication tests may also be used to determine if the product contains antibiotics or banned substances which cannot be applied to products at the farm if it is to be sold as certified, based on the requirements of the farm standard.

## 5.6 Specific requirements for under-assessment product

#### Guidance 5.6

This section only relates to fisheries, farms, or named members of a fishery/farm client group. Under-assessment product refers to fish or fish products harvested during the assessment process, but before the fishery or farm is certified. Under-assessment product must be harvested after the specified eligibility date, which can be found on the MSC or ASC website (see ASC latest farm audit report).

- 5.6.1 Organisations shall only be eligible to purchase under-assessment product if they are:
- a. A fishery or farm undergoing assessment, or
  - b. A named member of the client group for a fishery, or the same legal entity as the farm undergoing assessment.

#### Guidance 5.6.1.b

Only fisheries, farms or named members of the client group are eligible for taking ownership of under-assessment product, or for selling under-assessment product between members. No other CoC certified companies further down the supply chain are eligible to buy under-assessment product.

Organisations which are eligible to purchase under-assessment product as per 5.6.1 can use subcontracted storage facilities to handle under-assessment product, as long as the fishery, farm or client group member retains ownership until such time as the fishery or farm is certified.

- 5.6.2 Organisations handling under-assessment product shall comply with the following requirements:

- a. All under-assessment products shall be clearly identified and segregated from certified and non-certified products.
- b. The organisation shall maintain full traceability records for all under-assessment product, demonstrating traceability back to the Unit of Certification and including the date of harvest.
- c. Under-assessment product shall not be sold as certified or labelled with the MSC or ASC label or other trademarks until the fishery or farm is certified.

#### Guidance 5.6.2.c

When the fishery or farm is officially certified, the Public Certification Report will be posted on the MSC or ASC website.

## 5.7 Specific requirements on forced and child labour

- 5.7.1 The organisation shall sign the CoC Certificate Holder Statement of Understanding of Labour Requirements stating that it agrees to complete a labour audit as per 5.7.2.
- 5.7.2 The organisation shall provide evidence that the relevant sites or subcontractors have completed an on-site labour audit with a recognised third-party labour program and that complies with MSC Third-Party Labour Audit Requirements.
  - 5.7.2.1 The on-site labour audit is not required to be completed by the first audit against the CoC Group Standard v2.0.
  - 5.7.2.2 Recognised third-party labour programs are:
    - a. amfori Business Social Compliance Initiative,
    - b. SEDEX Members' Ethical Trade Audit,
    - c. Social Accountability International's SA8000,
    - d. Consumer Goods Forum's Sustainable Supply Chain Initiative (SSCI) recognised social standard.
- 5.7.3 The organisation shall inform the CAB within 2 days if the organisation or any of its sites or subcontractors fails to comply with the MSC Third-Party Labour Audit Requirements.

#### Guidance 5.7.3

The intent of 5.7.2.1 is to allow a grace period of approximately 1 year to complete the labour audit. This exemption is to be applied once only.

The [CoC Certificate Holder Statement of Understanding of Labour Requirements](#) and the [MSC Third-Party Labour Audit Requirements](#) are available on the MSC website ([msc.org](http://msc.org)).

- 5.7.4 Organisations are exempt from 5.7.1-3 if they are Lower Risk for forced and child labour violations according to the Country Labour Risk Scoring Tool.

#### Guidance 5.7.4

The Country Labour Risk Scoring Tool is [Table 5](#) and [Table 6](#) in the CoCCR.

- 5.7.5 If the organisation is an at-sea operation (e.g. a processing vessel), it shall comply with the MSC Fisheries Certification Process [7.4.4.2-4](#) (Submission of forced and child labour policies statement) instead of 5.7.1-3.

## Principle 6 Additional requirements for Group CoC

### 6.1 Group Control

- 6.1.1 The organisation shall designate a central office (group manager) function which can ensure that all sites on the group certificate conform with this Standard.

#### Guidance 6.1.1

The central office (group manager) is the organisation, legal entity, individual, or other function that will manage the group certificate. This function provides the means for ensuring that all sites meet the CoC Group Standard, that internal controls (such as internal audits) are carried out, and that any non-conformity is addressed.

- 6.1.2 The organisation shall be able to demonstrate that procedures covering this Standard are implemented across all sites on the group certificate.

#### Guidance 6.1.2

Implementation can be demonstrated either through written documentation and/or evidence of existing procedures and management systems (these may not need to be MSC or ASC specific). Procedures will typically describe how the central office and sites will work together to ensure that all sites meet this Standard.

For example, procedures may describe how traceability and identification of products occurs at site level, and identify specific roles and responsibilities. The organisation may not need to develop new MSC and/or ASC-specific procedures if CoC requirements are met by existing systems.

- 6.1.3 The central office (group manager) shall demonstrate its control over sites in 1 of the following ways:
- a. The sites are fully owned by the central office (group manager).
  - b. The sites are franchises of the central office (group manager).
  - c. The central office (group manager) has a signed agreement or contract with each of the sites requiring the site to:
    - i. Conform to the CoC Group Standard.
    - ii. Abide by decisions made by the central office (group manager), the CAB, and the MSC's accreditation body, including issuing of non-conformities and corrective actions.

#### Guidance 6.1.3

The organisation needs to maintain adequate controls to ensure that all sites within the group comply with relevant sections of the CoC Group Standard. This control can be demonstrated in different ways, depending on the type of group and the nature of the relationship between the central office (group manager) and sites.

- 6.1.4 The organisation shall appoint a person (the CoC contact person or group manager) who is responsible for ensuring the group's conformity with this Standard.
- 6.1.4.1 The name, position, and contact details of the CoC contact person or group manager shall be documented and communicated to the CAB.
- 6.1.5 The organisation shall document the roles and responsibilities of the CoC contact person or group manager, internal auditors, and other responsible personnel at the central office and site level.
- 6.1.6 The organisation shall maintain up-to-date training records for all responsible personnel as per 5.1.2.

### Guidance 6.1.6

Records can be kept by the central office (group manager) or at the site level, but the organisation will need to produce these records for review when requested by the CAB.

- 6.1.7 The central office (group manager) shall sign a contract with the CAB and be responsible for the following related to the central office and all sites:
- a. Conformity with the CoC Group Standard.
  - b. Fulfilment of any conditions raised by the CAB.
  - c. Payment of all certification costs.
  - d. All communication with the CAB, excluding expedited or unannounced site audits.

## 6.2 Site register and adding new sites

- 6.2.1 The central office (group manager) shall maintain a register of all sites in the group certificate, including:
- a. Name or position, and email or phone for a designated contact at each site who is responsible for ensuring that the site conforms with the CoC Group Standard.
  - b. Physical and postal address of each site.
  - c. Date of joining and, if applicable, leaving the group certificate.
- 6.2.2 The central office (group manager) shall:
- a. Provide the CAB with the site register before the initial audit.
  - b. Keep the site register up-to-date.
  - c. Notify the CAB within 10 days of any sites being added or withdrawn, by sending the CAB details of the new or withdrawn sites as described in 6.2.1.c.
  - d. Ensure that written consent from the CAB is obtained before new sites are added if:
    - i. The number of new sites added since the last audit will increase the total number of sites by more than 10%, or
    - ii. The new sites propose to carry out new activities.

### Guidance 6.2.2.d

The CAB may decide to conduct a remote or on-site audit if warranted.

If the number of sites to be added is less than or equal to 10% of the total number of sites at the last CAB audit, the organisation need only inform the CAB of these changes in writing, as per 6.2.2.c.

- 6.2.3 The organisation shall verify that any new site is able to conform with this Standard through an internal on-site or remote audit before adding the site(s) to the certificate.

### Guidance 6.2.3

This will also ensure all staff at the new site are trained and competent in applying CoC requirements as outlined in 5.2.1, 5.2.2 and 5.3.1.

For vessels, the internal audit can happen after they have been added to the site list, but before they start handling certified product.

- 6.2.3.1 An internal onsite audit is not needed when the site meets 6.4.1.1, or when:
- a. All sites are under the control of a common management system, which determines the parameters for seafood supply, traceability infrastructure, and

staff operation procedures, and is maintained by the organisation's designated central office.

#### **Guidance 6.2.3.1.a**

The CAB will evaluate whether all sites are working to the same centrally determined protocols and procedures that ensure product integrity.

- 6.2.4 When sites are suspended or withdrawn from the group certificate, the organisation shall have a process to notify the site and MSCI that they can no longer continue to use the MSC or ASC label or other trademarks, including on packaging and menus.

#### **Guidance 6.2.4**

The organisation is expected to take action to ensure that sites no longer in the group certificate will stop using the MSC or ASC label or other trademarks. This may include removing the label from unused packaging, menus, or signage and, if possible, verifying during the next visit to the site that the MSC or ASC label is no longer used.

### **6.3 Use of the MSC and ASC label and other trademarks**

- 6.3.1 The organisation shall ensure that all sites using the MSC or ASC label or other trademarks are covered by a valid licence agreement.

#### **Guidance 6.3.1**

There can be 1 licence agreement with the central office that covers all sites, or each site (or group of sites) may have their own licence agreement with MSCI.

### **6.4 Internal audits**

- 6.4.1 Before the initial group certification audit conducted by the CAB, an onsite internal audit shall be conducted for each site to ensure conformity with this Standard, with the exception of 6.4.1.1.
- 6.4.1.1 Sites do not require an internal on-site audit if they only handle certified products in sealed containers, or do not physically handle certified products, or handle certified seafood exclusively.

#### **Guidance 6.4.1.1**

Internal audits before certification are recommended, but not required, for sites that only handle products in sealed containers, such as wholesaler, storage, or distribution sites. Sealed containers refer to boxes, bags, pallets, or other containers that are secured and are not opened or altered during handling. Pallet-level containers may be broken down, provided that individual sealed boxes or containers are not altered.

- 6.4.2 Internal auditors shall be able to demonstrate competence in carrying out internal audits, including knowledge of this Standard, internal audit processes, identification of non-conformities, and issuing of corrective actions.

#### **Guidance 6.4.2**

Internal auditors need to demonstrate a good understanding of CoC requirements as well as auditing processes. Internal auditors can be members of the organisation's staff or from an external organisation.

- 6.4.3 Internal audits shall verify that each site is in conformity with this Standard and that relevant internal policies are implemented.

### Guidance 6.4.3

It is the responsibility of the central office to ensure effective internal audits take place. Internal audits can be carried out by external auditors who are not group employees, provided they cover all MSC requirements. These audits do not need to be MSC-specific but must be able to evaluate conformity with this Standard.

- 6.4.4 The organisation shall ensure that all corrective actions resulting from internal audits are verified as completed and effective before the initial certification audit by the CAB, and before adding a new site to the group certificate.

### Guidance 6.4.4

Any non-conformity found during internal audits before certification need to be closed out before the initial certification audit by the CAB can proceed. If the same problems are detected by the CAB during the initial certification audit, the CAB can raise additional non-conformities.

- 6.4.5 The organisation shall conduct an internal audit of all certified sites at least annually after initial certification, excluding sites that:
- a. Handle only certified seafood.
  - b. Have received a CAB audit within the last 12 months and no non-conformities were found.
- 6.4.5.1 The organisation shall maintain internal audit reports and CAB audit reports.
- a. Internal audit reports shall include at a minimum the audit date, the internal auditor name, and any non-conformities and corrective actions.

### Guidance 6.4.5

For new sites that have recently joined the group certificate, this can start at the next year's internal audit cycle.

- 6.4.6 If during an internal audit the organisation discovers that the site is not in conformity with relevant sections of this Standard, the internal auditor or central office shall:
- a. Document the non-conformity and corrective actions issued.
  - b. Ensure corrective actions have been fully completed within the following timeframe:
    - i. Maximum 4 days for any non-conformities where non-certified product has been sold as certified.
    - ii. Maximum 30 days for any non-conformities which could lead to a risk of non-certified product being sold or labelled as certified.
    - iii. Maximum 90 days for all other non-conformities.
  - c. Suspend the site from the group certificate until the corrective actions are completed satisfactorily, if the site does not complete the corrective actions within the timeframe.

### Guidance 6.4.6.b-c

Corrective actions need to be effective at addressing the non-conformity and any underlying causes (for example, inadequate employee training or site-level procedures that are not fully implemented).

If the non-conformity is raised prior to initial group certification or adding a new site to the certificate, 6.4.4 shall be followed.

The central office (group manager) may adjust the timeframes for the site to address non-conformities if the site is not handling certified product during this timeframe or if internal management procedures prescribe different timeframes.

- 6.4.6.1 If non-conforming product is found during an internal audit, the non-conforming product procedure shall be followed as per 5.4.1.

## 6.5 Internal group reviews

- 6.5.1 The central office or sites shall review at least annually records showing total volumes of certified product purchased and sold for all sites on the group certificate, excluding any volumes of certified product sold to final consumers.
- 6.5.1.1 Any sites handling certified seafood exclusively can be excluded from the review.
- 6.5.1.2 Sites handling, selling, or serving certified seafood exclusively to final consumers only need an annual review of product purchases.

### Guidance 6.5.1

This requirement helps to ensure that sites have not sold more certified seafood than they purchased. This relates to 4.4, but because only a sample of sites in group CoC are audited by the CAB, it is the group's responsibility to review records for all sites.

Records can be reviewed for each site individually or for the entire group, and can be done by staff at the site level or central office. If sites are selling to final consumers, sales volumes do not need to be recorded. However, the central office will still need to review input records to ensure that certified product was purchased or received if sites are using the MSC and/or ASC label or other trademarks.

- 6.5.2 After certification, the organisation shall complete an internal group review at least annually to verify conformity with this Standard and to assess the effectiveness of the group's management system.

### Guidance 6.5.2

The internal group review is intended to ensure that the group's policies and procedures are functioning well and that all sites continue to conform with this Standard. Any problems or non-conformities that have been discovered at site level need to be reviewed to identify whether they also require changes to the group's management system.

- 6.5.3 The internal group review shall include:
- a. An assessment of the organisation's ability to conform with this Standard.
  - b. Reading the latest version of this Standard, noting any changes since the previous version and how these changes will be incorporated into existing procedures.
  - c. A review of internal and CAB audit reports from the previous year, including non-conformities identified, corrective actions taken, and whether non-conformities have been closed.
  - d. A review of any complaints received relating to the CoC program and actions taken as a result.
  - e. Identification of any systemic issues or recurring site-level non-conformities, and proposed changes to the organisation's management systems to address these issues.
  - f. Records that all relevant sections of 6.5.3 have been completed.

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