



Marine Stewardship Council

# Summary of Changes Chain of Custody Standard Version 4.0

20 February 2015



South African Hake processing / © Sea Harvest

*The revised MSC Chain of Custody Standard gives greater access to a diverse range of companies and improves the efficiency and rigour of the Chain of Custody program.*

This document outlines the key changes to the MSC Chain of Custody (CoC) Standard, following the 2014 CoC Program Review. The revised Standard, along with all associated scheme documents was released on 20 February 2015.

### Implementation timeframes

Release date: **20 February 2015**

Effective date: **1 September 2015**

From 1 September 2015, all companies will be audited against the new version of the CoC Standard at their next audit. However, if your next audit is before September 2015, please talk to your certifier to confirm which Standard version you will be audited against.

Further details and the revised CoC Standard can be found on the [MSC website](#), along with detailed support about [transitioning to the new version of the Standard](#). If you have any questions, please get in touch with your local [MSC Outreach Team](#).

### Chain of Custody Program Review 2014

The MSC CoC Program is core to the MSC’s mission to ensure its ecolabel is only displayed on seafood that has originated from MSC certified sustainable fisheries.

Beginning in January 2014, the MSC carried out a thorough, stakeholder-led review of its CoC Standard and Certification Requirements. The MSC’s standard-setting procedure aligns with FAO ecolabelling guidelines and the ISEAL standard setting code.

The review invited global supply chain stakeholders to provide feedback on the CoC Standard and Certification Requirements for greater clarity, accessibility, efficiency, and rigour.

### The Marine Stewardship Council

The Marine Stewardship Council (MSC) is an international non-profit organisation established to address the problem of unsustainable fishing and safeguard seafood supplies for the future. Our vision is for the world’s oceans to be teeming with life – today, tomorrow and for generations to come. Through our certification and ecolabelling program, we’re helping to create a more sustainable seafood market. We work with fisheries, seafood companies, scientists, conservation groups, and the public to promote sustainable seafood.

### What the MSC ecolabel means

The MSC ecolabel is the globally recognised mark for seafood that can be tracked back through the supply chain to the well managed and sustainable fishery that caught it.

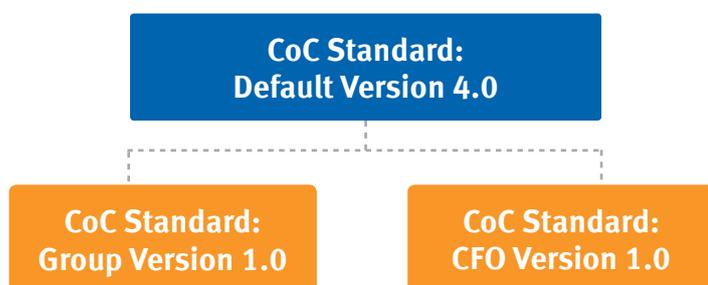
With the MSC ecolabel, seafood buyers, processors, retailers, and foodservice companies can show their customers that they only buy seafood that comes from world-class, sustainable fisheries. These businesses play a leading role in making certified sustainable seafood available to buyers and consumers, and creating demand for seafood from well managed fisheries.



Loblaw Companies Limited, Canada / © MSC

## Summary of changes – relevant to all certificate holders

The MSC revised **CoC Standard** now consists of one main (default) version along with Group and Consumer-Facing Organisation (CFO) versions:



### Overall changes made to the CoC Standard

The existing CoC Standard has been restructured so that all company requirements are in one consolidated document, with new guidance provided. Group CoC requirements are now aligned with the Default (single / multi-site) CoC Standard where relevant, but have been released as a separate, Group version of the Standard.

In addition, a new optional version of the CoC Standard has been developed specifically for Consumer-Facing Organisations (CFOs). This includes contract caterers, restaurants / restaurant chains, fishmongers, and retailer fish counters.

### Key changes to the CoC Standard

#### More specific requirement to buy MSC / ASC certified seafood from certified suppliers only:

This was not specified clearly in the previous CoC Standard (version 3.0), and has now been clarified.

#### Checking the certified status of product:

Companies must now have a process in place to confirm the certified status of physical products when delivered.

#### Visual identification of certified seafood:

Guidance now recommends that seafood is identifiable as certified on physical products / packaging where possible. If not, companies must be able to link the product to traceability paperwork with clear identification.

#### Identification of MSC / ASC products on invoice:

The Standard now requires that products sold as certified must be identified as such on the respective line of the invoice (unless all items on an invoice are certified).

**Note:** your company can do this in a variety of ways.

#### Traceability to the point of sale:

The Standard now clarifies that any product that is bought and received as certified, must be traceable through to the point of sale. This applies even if some products are not ultimately sold as certified or with the MSC / ASC label.

#### Realistic conversion rates:

For any companies that carry out processing, conversion rates for certified products must be accurate and justifiable. **Note:** variable conversion rates due to quality, seasonality etc. are of course expected.

#### Auditing contract processors:

If non-certified contract processors are used, they must now be visited by the certifier at least annually after the initial visit (previously this was not specified).

#### Input / output records for sales direct to consumers:

Volumes of sales (outputs) sold to final consumers no longer need to be kept; however, records for any point before the final sale (i.e. processing volume at a central kitchen) may still be checked by the certifier.

#### Staff must be trained and competent:

Auditors will now put more emphasis on interviewing responsible staff members during the audit to verify their competency related to CoC.

#### Applicability to other schemes:

The Standard has been reworded to be applied to any recognised certification scheme that has a formal arrangement to share the MSC CoC program, such as the Aquaculture Stewardship Council (ASC).

#### New rules for 'under-assessment' product (previously under MSC Assessment Fish, or UMAF):

Only fishing operations, farms, or companies that are a named part of a fishery / farm under assessment are now allowed to buy product from this fishery / farm under assessment and keep it in storage for later sale as certified. Under-assessment product cannot be sold further down the supply chain until the fishery / farm is certified.

#### Contracts no longer required for storage subcontractors:

Written agreements are no longer required for storage subcontractors, provided other requirements are met.



MSC certified seafood storage / © Wouter Schuddebeurs

## Summary of changes – relevant to all certificate holders *continued*

### *Changes to the CoC audits*

#### **Revised surveillance audit frequency:**

The risk assessment (and Corruption Perception Index, CPI score) for determining surveillance audit frequency has been removed. All companies will now have annual surveillance audits, except for certain companies that qualify for an 18-months reduced audit by meeting one of the following criteria:

- I. Handle certified seafood in sealed containers only;
- II. Handle 100% certified seafood; or
- III. Do not physically handle products.

Surveillance audits for low-risk trading companies may also be carried out remotely. Speak to your certifier for more details.

#### **Unannounced audits for a small number of companies:**

Each certifier will now need to carry out unannounced audits for at least 1% of their clients. This sample can be selected randomly or based on risk aspects. Unannounced audits can replace a scheduled surveillance audit, which means there will be no extra cost to companies.

### *Changes in the Standard that affect Group CoC certificate holders only*

#### **Reduced Risk Group:**

With the introduction of the Consumer-Facing Organisation (CFO) CoC Standard, the Reduced Risk Group (RRG) requirements have been removed. However, for those RRGs that do not qualify for the new CFO version of the Standard, (i.e. groups of wholesalers or distributors), the Group CoC Standard has been revised to better reflect RRG criteria with relation to internal audits and other key points.

#### **Greater flexibility in documenting procedures:**

Previously, standard-risk (non-RRG) groups had to specifically document CoC procedures to demonstrate how they can meet the criteria of the Standard. Now, groups need to demonstrate that procedures are implemented across all sites. **Note:** this does not necessarily require written documents.

#### **Compliance check for new sites:**

There is now a new, specific requirement for companies to verify that new sites can meet the Group CoC Standard before adding them to the group certificate. **Note:** this can happen in a variety of ways (i.e. audit, training, questionnaire, etc.)

#### **Non-compliance found at internal audits:**

The grading and timeframes for addressing violations found at internal audits has been simplified.

#### **Internal audits:**

Slight adjustment in this clause with the removal of RRGs. Internal audits are now required before certification for all sites, except for sites that:

- I. Only handle sealed products (i.e. in secured boxes, crates, or packs which will not be opened);
- II. Do not physically handle products; or
- III. Handle 100% certified seafood.

Annual internal audits are required after certification for all sites, except those that handle 100% certified seafood.

#### **Input / output reconciliation (mass balance):**

Groups need to do this at least annually for all sites, but this can now be done at the site or group (central office) level.

### *Special information for end-of-supply-chain companies only (Consumer-facing organisations)*

In response to stakeholder feedback, the MSC has developed a new version of the CoC Standard specifically for CFOs, such as retailers with fish counters, contract caterers, and restaurants.

The CFO CoC Standard was developed with extensive stakeholder input and piloted with six previously uncertified companies. Feedback so far suggests the new Standard is significantly more accessible and fit-for-purpose than previous CoC requirements.

If you are a company of any size that sells to final consumers, talk to your certifier or your local **MSC Outreach Team** to find out whether you qualify for the **CFO CoC Standard** and whether you might benefit from it.



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Find out more about the changes  
to the Chain of Custody Program:  
[www.msc.org/chainofcustody](http://www.msc.org/chainofcustody)

Further queries, please contact:  
[standards@msc.org](mailto:standards@msc.org)

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