



Get Certified!

Your guide to the MSC Chain of Custody certification process

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

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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 interpretative issues arise in relation to the content covered in the publication, the text of the English MSC scheme documents will prevail in all instances.

Cover photography: Processing of the MSC certified sustainable hake from the South African trawl fishery / © Sea Harvest



Welcome

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

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

The standard has five principles:

MSC Chain of Custody Standard



Principle 1:

Certified products are purchased from certified suppliers



Principle 2:

Certified products are identifiable



Principle 3:

Certified products are segregated



Principle 4:

Certified products are traceable and volumes are recorded



Principle 5:

The company has a management system

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)

The 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 **main (default) standard**, which has been designed for companies with one or a few physical locations. The other two versions of the standard (Group and Consumer-Facing Organisation) can be accessed from the [MSC website](#).

Examples of businesses that are eligible to the Default Standard certification

-  A fishmonger serving final consumers and caterers - with the majority of sales by volume and value going to the catering trade
-  A seafood company with a trading office, processing facility, and storage unit

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



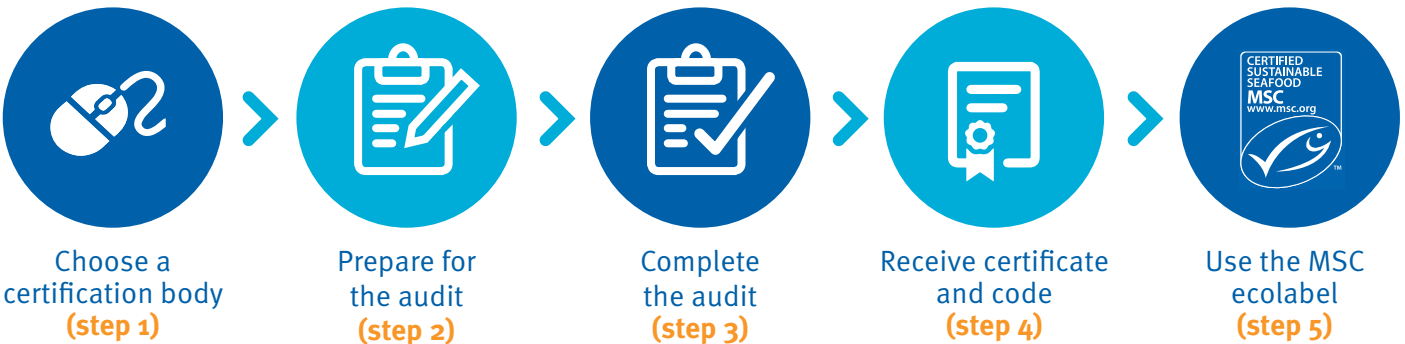
- The acronym "MSC"
- The name "Marine Stewardship Council"
- The MSC ecolabel

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



The certification process

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

Choosing a certification body

The role of a certification body is to provide an independent, third party evaluation of your company's chain of custody procedures and to appoint an auditor to conduct the audit.

The first step is to choose a certification body that operates where your company is based. All certification bodies listed have been approved by an independent 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. 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 (for example packing, processing or trading)
- 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.



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 definitions 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.

Certificate types for the Default Standard



- Certification of one site is called a "single-site certificate"
- Certification of more than one site is called a "multi-site certificate"

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 away 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>

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.

Pre-audit checklist

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

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

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

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

Training staff



Training can take any format: in-person, online, on paper, and can be delivered by anyone who knows (or can quickly learn) about the requirements. It is important to keep all records of your staff training program. Also do check with **your local MSC office** for available training material in your local language.



For the MSC pre-audit checklist, please visit msc.org/coc/pre-audit-checklist-default

Preparation is key



During the audit, the auditor will assess whether your company meets the 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 the audit, bear in mind it may require booking in advance, depending on the auditor's availability. Also remember to request your preferred language for the audit.

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

Step 3

The audit

At your audit, the auditor will be looking for evidence that demonstrates the effectiveness and durability of the procedures, processes, systems and training that your company has in place to 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

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

However, initial audits can be conducted remotely if companies or sites meet both the following criteria:

- Activities relating to certified products do not extend beyond trading (buying/selling)
- Only use subcontracted transport and/or storage (no subcontracted processing or re-packing)

Audit duration

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

The MSC only sets a minimum audit duration of 12 hours on-site, spread over two working days, for companies meeting **all** the following criteria, if your company:

- is a processor or contract processor
- is located in a country with a transparency score of below 41 according to the latest Corruption Perception Index
- handles both certified and non-certified seafood
- purchases more than 5,000 MT of seafood or more than 20 seafood batches per year (both certified and non-certified)

Good to know



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



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



Check your country's score on Transparency International's latest Corruption Perception Index at www.transparency.org/research/cpi

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, and visits to subcontractors or other sites where relevant.

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

During the audit, the auditor will:

Check	Review
<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 for 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 (for example trading, distribution, processing) <input type="checkbox"/> The content and implementation of written procedures (for example protocols for maintaining segregation, 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
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 above, they will conclude their findings and summarise any **non-conformities**.

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



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

DNA testing



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

Time limit



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



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



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

Non-conformities

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

There are two gradings for non-conformities:

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

Examples where non-conformities can be raised

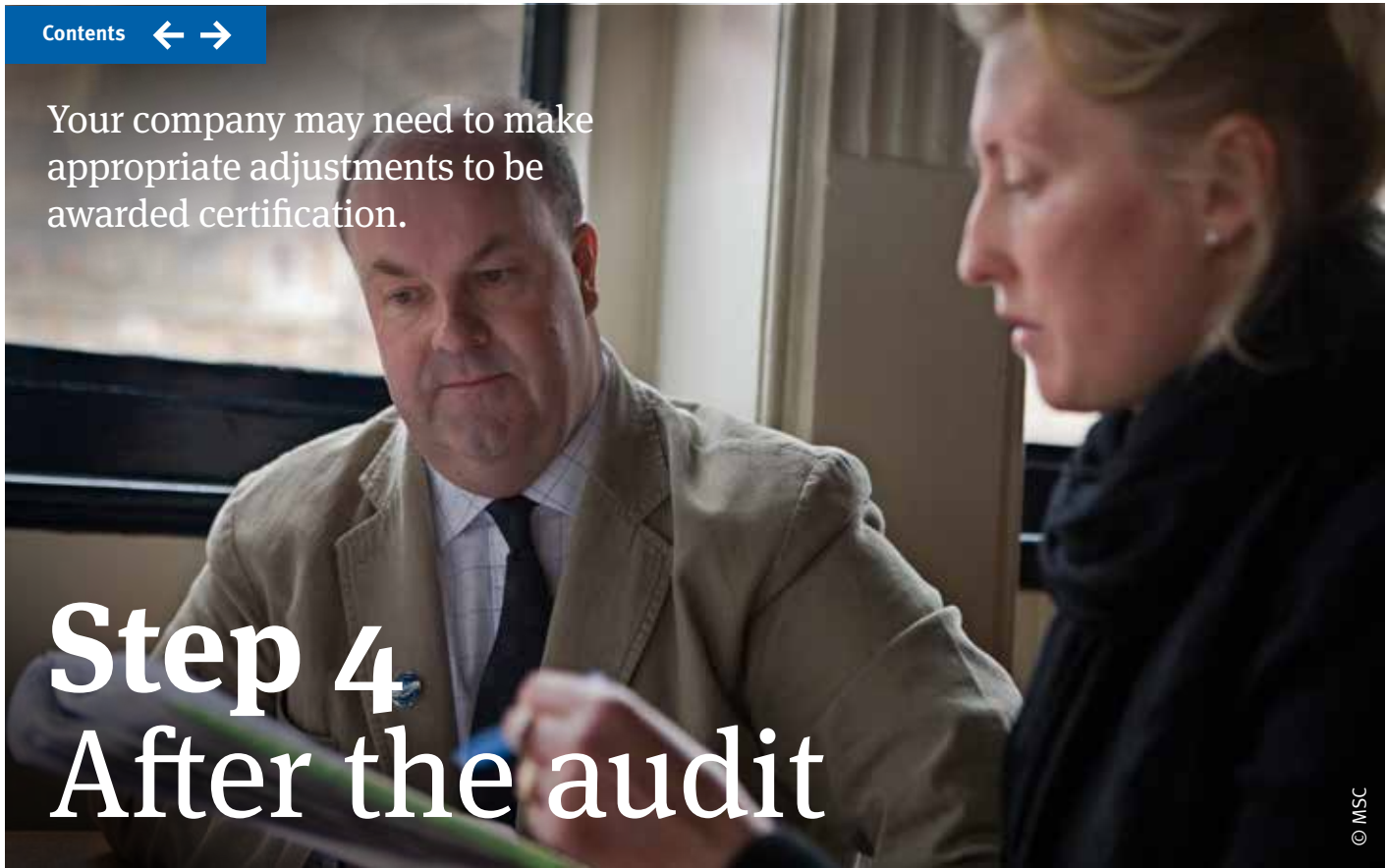
- ✘ If your auditor finds your company has knowingly used vessels listed on Regional Fisheries Management Organisation (RFMO) blacklists
- ✘ If your auditor finds your staff present insufficient knowledge and understanding of their role related to chain of custody that can compromise product integrity



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

Audit closing meeting

At the end of the audit, the auditor will call a closing meeting to summarise their findings, including any non-conformities, the details and timeframes of any actions that need to be taken before certification can be awarded. They will also confirm that the scope, supplier and subcontractor list is correct, and that you know when to inform the certification body of any changes to your certificate (see further detail in [page 15](#)).



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

Step 4 After the audit

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

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

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

Determining certification

Your certification body must make a decision on whether to grant certification within 30 days of the audit or within 30 days of receiving evidence that leads to the closure or downgrading of a non-conformity. The certification body will then update the audit report and send you a 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

Surveillance audits

Surveillance audits are either annual, or every 18 months if any of the following criteria are met:

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

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

- Your company is classed as a trader
- Your company does not take physical possession of certified seafood
- The company does not use contract processors or repackers for certified seafood.
- The country of location has a transparency score above 41 according to the latest Corruption Perception Index

There is a small chance that your company will receive an unannounced audit. Each certification body must conduct unannounced audits for at least 1% of their clients. If this happens, you will not be given notice of which day the audit will occur (but you will know the six month window of when your surveillance is due). In this case, it automatically counts as your next scheduled surveillance audit.

Scheduling surveillance audits



Surveillance audits 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 when there is a deviation from the standard. In this case, your company is required to take the following actions:

Minor non-conformities

Must be addressed by the next scheduled audit.

Note: if the auditor finds the same minor non-conformity at the next audit, it is likely to become a major non-conformity.

Major non-conformities

Send the certification body an effective action plan with root cause analysis, corrective actions and timeframes to address them, in order to close out or downgrade the non-conformity within 30 days of the audit.

Note: if this cannot be done, your certificate will be suspended.

Certificate suspension

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

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

- There is a demonstrable breakdown in the chain of custody caused by the company's actions or inactions
- The company has sold non-certified seafood as certified
- The company cannot prove that seafood sold as certified is in fact certified
- The company has not addressed a major non-conformity within the specified timeframe
- The company does not agree to surveillance or re-certification audit within the necessary timeframes
- MSC has suspended or withdrawn a company's licence agreement and the company has not complied with the instructions in the given timeframe

Regardless of the cause, from the day of suspension product cannot be sold as certified and your company must inform your customers in writing of your suspension.

For a suspension to be lifted, your company must submit a corrective action plan that is subject to acceptance by the certification body.

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

Inform your certification body

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

Request approval from your 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

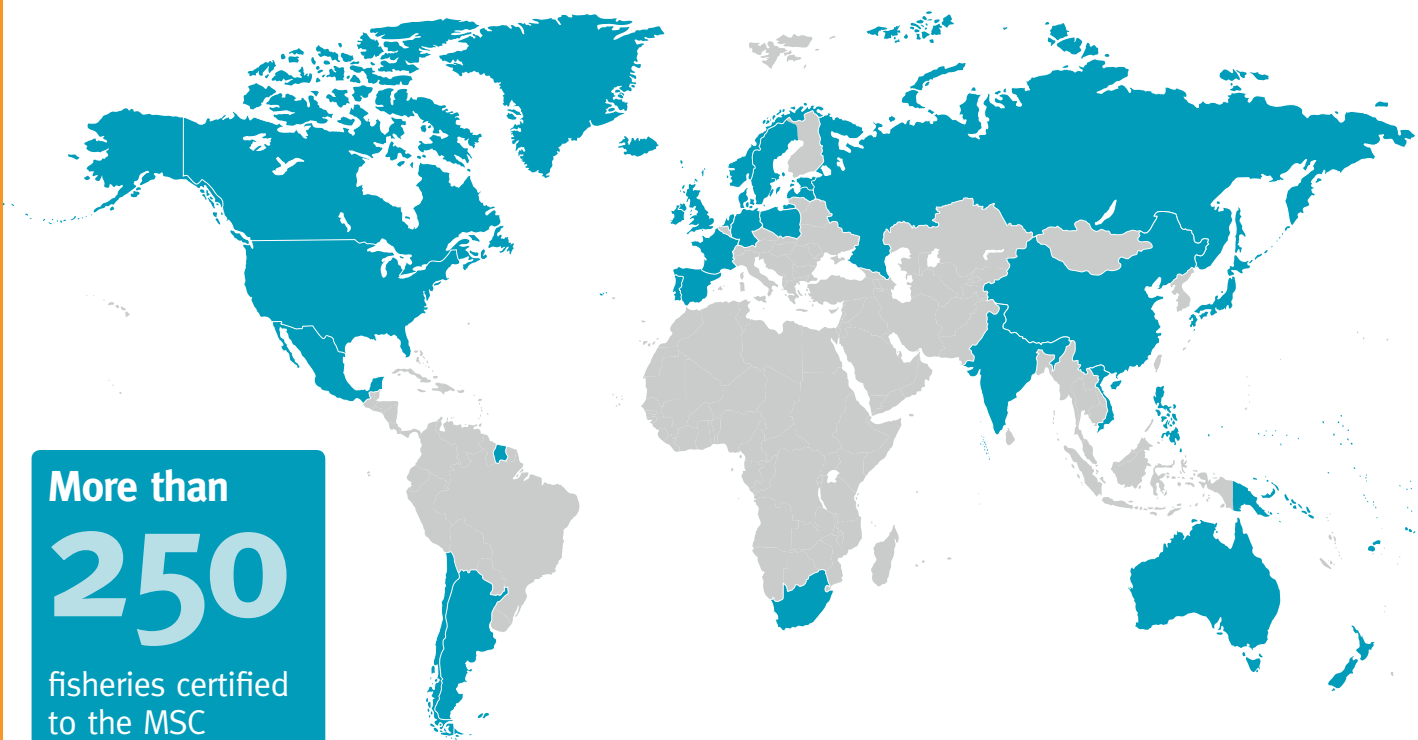


A certificate can become invalid at any point, if a company is found to have been successfully prosecuted for violations of laws on forced labour in the last two years.



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

Countries where fisheries are engaged in the MSC program



More than

250

fisheries certified
to the MSC
Fisheries Standard

Get in touch:

www.msc.org/supply-chain
info@msc.org



@MSCecolabel



/marine-stewardship-council



/sustainableseafood

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