

How to get ASC Chain of Custody certified:

A supplementary checklist for supply chain companies

These requirements apply to processors, traders and other supply chain companies handling ASC certified products. ASC uses the Marine Stewardship Council (MSC) Chain of Custody (CoC) Standard for ASC certified products. Guidance on preparing for MSC CoC certification can be found here: [MSC Chain of Custody Standard](#) and the [Supply Chain Certification Guide](#).

From May 30, 2023 onwards, there are ASC-specific additional requirements for ASC certified products. The sections below outline which requirements apply, and the circumstances for their application, depending on the type of organisation.

Section of ASC CoC Module	Requirement	Who it applies to (and exemptions)	How to prepare, and resources/tools to help with preparation
Eligibility & Guidance, 5.7.2, 5.7.2.1	Global Food Safety Initiative (GFSI) recognised, or ISO 22000, scheme certification Note: Required from 30 May 2024	Organisations carrying out processing, contract processing, packing or repacking Organisations for which any of the following apply are exempted: <ul style="list-style-type: none"> ○ Less than EUR 2 million annual turnover ○ Less than 200 MT annual volume of seafood handled 	Choose a GFSI recognised or ISO 22000 scheme certification, as best suits your markets, and arrange an audit

		<ul style="list-style-type: none"> ○ Less than 50 seafood-business staff (including at peak times) <p>Exempted organisations must still comply with food safety regulations and inspections</p>	
<p>5.8.1 & Guidance (5.9.1 in CFO Version)</p>	<p>Food Fraud Vulnerability Assessment (FVA) to mitigate fraud risk –</p> <p>as appropriate to the scale of business, covering farmed seafood products and including an up-to-date intervention plan</p>	<p>All certificate holders</p>	<p>Check if you already have an FVA in place – if you already have this as part of GFSI-recognised scheme requirements then you can build on it</p> <p>If you do not already have an FVA in place, please refer to the following list of suggested resources and tools to help with preparation. Any of the listed resources may be used:</p> <p>GFSI Food Fraud Technical Document</p> <p>SSAFE Food Fraud Vulnerability Assessment</p> <p>USP Food Fraud Mitigation Guidance</p> <p>IFT Pre-screening Ingredients for a Food Fraud Vulnerability Assessment</p> <p>PAS 96: 2017 Protecting from Food Fraud</p> <p>Food Fraud Initial Screening Model - article, primers and Excel guide</p> <p>Spink, J, DC Moyer and C Speier-Pero. 2016. “Introducing the Food Fraud Initial Screening Model (FFIS).” <i>Food Control</i> 69: 306–314.”</p>

			<p>Campden BRI Guideline 72: TACCP/ VACCP Practical Guide, Second Edition</p> <p>Food Fraud Advisors Vulnerability Assessment Tools</p> <p>Michigan State University and DNV Food Fraud webinar series</p> <p>BRC Understanding Vulnerability Assessment & BRC Food Interpretation Guidance</p> <p>FSSC 22000 Guidance Document: Food Fraud Mitigation</p> <p>SQF Food Fraud Implementation & Audit Guidance and Guidance for Sites and Auditors</p> <p>IFS Guideline for Product Fraud Mitigation</p> <p>Fighting Food Fraud with Vulnerability Assessment</p>
<p>5.2.1.1 (5.3.1.1 in CFO Version)</p>	<p>An effective process to inform CAB within two days, if:</p> <ul style="list-style-type: none"> ○ GFSI-recognised scheme or ISO 22000 certification becomes invalid (if applicable), or ○ A court case or other legal action related to the scope of the CoC Standard arises, or ○ On becoming aware that the organisation, or their products, are not 	<p>All certificate holders must have this process in place, although it is only triggered in specific circumstances</p>	<p>This can be built into existing internal processes that you have already established, so that employees know how to report these situations if they occur</p>

	in compliance/ conformance with any relevant applicable laws, regulations, ASC standards and/ or requirements		
1.1.2 and 1.1.3 & Guidance (1.1.1 and 1.1.2 in CFO Version)	Check the starting point of CoC and confirm that there is no gap in CoC certification coverage between the point where the farm certification ends and the point of purchase as first buyer in the supply chain. This includes when a new farm supplier is added. If a gap is identified and left unaddressed, the certified chain of custody is broken and the organisation shall not sell affected products as certified. Also check factors that may affect eligibility of product to be sold as certified	Certificate holders who purchase directly from farms	Look into the farm's certificate or audit report to check where CoC begins, and visit this page to check issues that may affect product eligibility
4.4.2 & Guidance (4.2.2 in CFO Version)	Submit data to ASC, at the frequency and in the format specified by ASC. Data required to be submitted may include purchase and sales volumes, species, buyers and suppliers, and may cover consumer-facing and non-consumer facing products. Data on products from certified origins but not sold as certified may be requested when necessary to verify conformance with ASC requirements, for example in an investigation	All certificate holders, when request is made	You only need to prepare if ASC reaches out to you. At that point, ASC will then provide you with the relevant links and training needed

<p>5.4.2 (5.5.2 in CFO Version)</p>	<p>Non-conforming product requirements must be followed</p>	<p>All certificates (where product is converted to conventional, and an investigation occurs); CFO certificate holders exempted</p>	<p>You need to hold records for products that are converted to non-certified status</p>
<p>5.5.2.1 (5.6.2.1 in CFO Version)</p>	<p>Collection of samples or substances for verification of conformity</p>	<p>All certificate holders</p>	<p>No additional activity for certificate holder</p>