



Get Certified

Your guide to the MSC and ASC Chain of Custody certification process

Chain of Custody Standard: Group Version

For organisations with a central office and many locations distributing, processing or trading certified seafood such as cooperatives, franchises and vertically-integrated companies.

Contents

Welcome	03
Do you need certification?	05
The certification process	07
Choosing a certification body	09
Preparing for the audit	10
The audit	12
After the audit	14
Using the MSC and ASC trademarks to sell certified seafood	16
Maintaining certification	17
Complying with the requirements on Labour eligibility	21
Staying in touch with your certification body	24



Welcome

Join an international community that proudly supports sustainable certified seafood.

Our Chain of Custody Standard makes sure MSC and ASC labelled seafood comes from fisheries certified to the Marine Stewardship Council (MSC) Fisheries Standard or farms certified to the Aquaculture Stewardship Council (ASC) Farm Standard. Together we can protect the world's seafood for the future.

This guide covers the Chain of Custody Standard: Group Version for businesses with a central office function and many locations distributing, processing or trading MSC/ASC certified seafood.

The aim of the 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 or ASC office will be happy to help.

Contact your local MSC office at

 [msc.org/commercial-contacts](https://www.msc.org/commercial-contacts)

Contact your local ASC office at

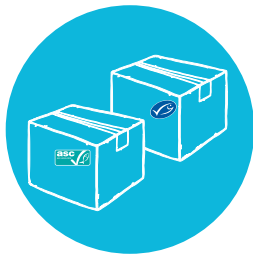
 [Regional teams - ASC International \(asc-aqua.org\)](https://www.asc-aqua.org)

THE CHAIN OF CUSTODY STANDARD: GROUP VERSION HAS SIX PRINCIPLES



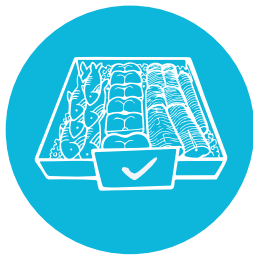
Principle 1:

Companies must purchase certified product from a certified supplier



Principle 2:

Certified products are clearly identifiable



Principle 3:

Certified products are separated from non-certified



Principle 4:

Certified products are traceable and volumes are recorded



Principle 5:

Your management system addresses the requirements of the Chain of Custody Standard



Principle 6:

Specific requirements for group Chain of Custody

Do you need certification?

The 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.

The Chain of Custody Standard has three versions, to meet the needs of the diverse range of supply chain businesses. This guide relates to the **Group version** of the Standard, which has been designed for companies operating across multiple locations. You can find out about the other two versions of the Standard (Default and Consumer-Facing Organisation) on the [MSC website](#).

Businesses can be certified to the Group version if they have effective internal controls and only a sample of sites handling or trading certified seafood need to be audited. This is more efficient and cheaper than each site being audited. These internal controls are managed by a central office, which must be a legal entity (not necessarily a headquarters) that coordinates audits and ensures that each site complies with the Standard.

Businesses are eligible for Group certification if:

- The central office takes control in one of the following ways:
 - The sites are fully owned by or franchises of the central office.
 - The central office has an agreement with the sites requiring them to conform to the Standard.
- They operate across several sites that process, pack or distribute product. For example, a seafood distributor cooperative with distribution centres across Europe; or a trans-national seafood processing company with 10 sites.
- A group manager is in place to coordinate the certificate for companies that are independent to one another. For example, a set of independent restaurants that appoint a group certification manager.

Businesses not eligible for Chain of Custody certification :

- A company that has been convicted of a forced or child 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.
- A company whose certificate was suspended in the last six months.
- Enhanced fishery or farm operations that are out of scope of the MSC Fisheries or ASC Farm Standards.

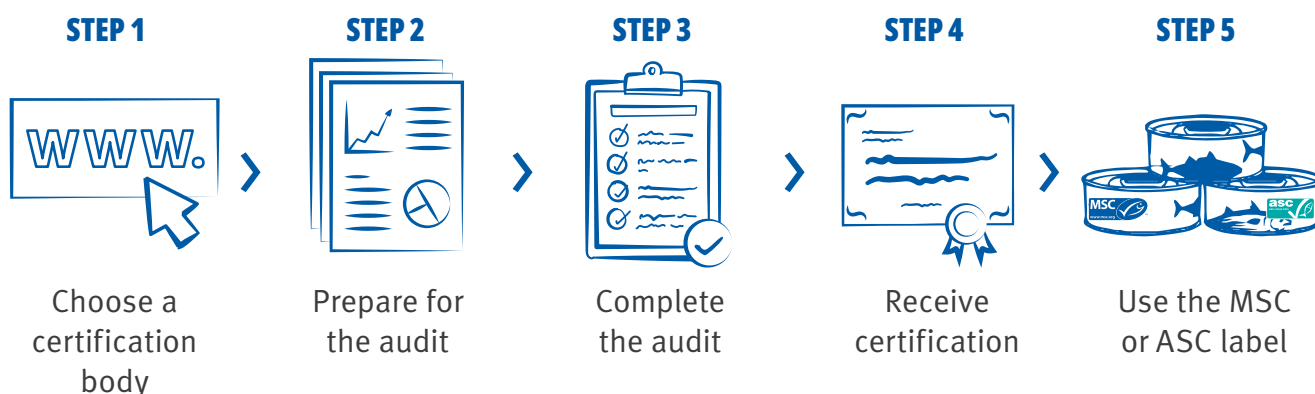
When Chain of Custody certification is not needed:

- If your company buys pre-packed, labelled certified products that will be sold to the end consumer without being opened, re-packed or re-labelled. Such items are known as consumer-ready tamper-proof products. Retail packages of frozen fish fingers or tins of smoked mackerel fillets are examples of 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 of custody is broken, and your customers may not make any claims about the product being 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 companies and therefore can be covered by your customer's Chain of Custody certificate as a subcontractor.

The certification process

The Marine Stewardship Council (MSC) and the Aquaculture Stewardship Council (ASC) have partnered to share the Chain of Custody Standard. This means you can have one certification audit that covers both MSC and ASC products. ASC Chain of Custody certificate holders must also comply with further requirements outlined in the additional [ASC Chain of Custody Module V1.3](#).

There are five steps to Chain of Custody certification:



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 who will become your most frequent contact throughout the certification process.

If you already have audits for other programs (for example, programs recognised by the Global Food Safety Initiative), it is worth checking with your certification body to see if they can introduce the Chain of Custody audits into your existing auditing schedule.

GOOD TO KNOW

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 Chain of Custody contact person will liaise with the certification body and should familiarise themselves with this guide and the [Chain of Custody Standard](#).



STEP 1 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.

The first step is to choose a certification body that operates where your company is based. All certification bodies are approved by [an independent assurance provider](#).

We recommend that you approach more than one certification body for 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 long-term picture of the cost structure. The MSC or ASC cannot influence the cost of certification, nor does the MSC or ASC receive any of this payment.

To quote on your certification, certification bodies may ask:

- Which seafood species you want to buy and sell as certified.
- What activities you perform with the certified seafood (for example packing, processing or trading).
- If you have any certified suppliers.
- Where your company is based and how many sites it has.
- If you intend to use subcontractors to process, pack, transport or store certified seafood.
- If you handle both certified and non-certified species.

Once you accept a quote, the certification body will send you a contract. Once you accept a quote, the certification body will send you a contract. [Your certification body will register your company on the MSC Chain of Custody scheme database to create a unique MSC Chain of Custody Code to be used upon certification.](#)



STEP 2 Preparing for the audit

The audit can be simple and straightforward if you have a clear plan of what needs to be done, by whom and by when.

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 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.

The MSC has produced training videos that can be used by companies to help train their staff on Chain of Custody certification: please visit the [MSC Training platform](#).

Site list

Your site list shows the sites you want to include in your group certificate, and details:

- a designated contact at each site who is responsible for site conformity with Chain of Custody
- name and position of this contact
- email or phone details for this contact
- physical and postal address of each site.

Your certification body will request this site list before the initial audit so they can calculate the number of sites to visit. As the number of sites in your certificate changes, there are specific rules to follow in communicating these changes to your certification body, which are detailed on page 25 of this guide.

Pre-audit checklist

Use the [MSC pre-audit checklist](#) to determine how much of the Standard your central office and sites meet without having to make any changes, and where you need to make adjustments to your operations. For ASC certificates you can also use the [ASC Chain of Custody Module supplementary checklist for supply chain companies](#).

Labour Eligibility Requirements

To be eligible for MSC or ASC Chain of Custody certification, the certification body will check whether any sites in the certificate have been convicted of forced or child labour violations.

If activities such as packing, processing or manual offloading are included, the auditor may also check for a completed self-assessment of labour practices prior to the audit. Please see page 21 of this guide for more details on how to comply with the [MSC Labour Eligibility Requirements](#).

Initial internal audit

Your group must appoint an internal auditor to conduct on-site internal audits before calling in the certification body. The aim is to check that any changes you have made after reviewing the pre-audit checklist have actually been implemented and that they are working in practice.

All sites must comply with the Standard, however those meeting any of the following criteria do not need an initial internal audit:

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

Internal auditor

Your internal auditor can be anyone with knowledge of the Chain of Custody Standard, and who is capable of objectivity in audit and decision-making. They need to demonstrate competence in carrying out internal audits, including internal audit processes, identification of non-conformities, and issuing of corrective actions.

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. Audits occur annually with due dates calculated from the original certification date. This date will remain the same for the length of a certificate holder's continuous participation in the MSC program (see page 17 of this guide for more information).

GOOD TO KNOW

During the audit, the auditor will assess whether your company meets the Standard. They cannot offer advice on improvements and if they find your company doesn't meet the Standard they will raise a non-conformity.



STEP 3 The audit

All Chain of Custody audits (initial, surveillance and re-certification) cover the same audit process, with the aim of checking whether your company meets the Chain of Custody Standard.

The auditor will be looking for evidence that demonstrates the effectiveness and durability of the procedures, processes, systems and training that your company has in place to fulfil the requirements of the Standard. They will therefore ask to review documents or records, interview staff, and see your process in action.

Audit location

All audits take place on-site at your company's designated central office and a sample of sites. How many sites depends on the total number of sites included in the certificate, and your company's risk profile. Your risk level will be calculated by the certification body based on factors such as your activity, other certifications held, location, and others. See the [pre-audit checklist](#) for more detail.

Audit process

The audit begins with an opening meeting, during which the auditor confirms your company's eligibility to be certified against the Chain of Custody Standard, including confirming the Labour Eligibility Requirements are met, the audit plan, the certificate's scope, the type of documentation for review, site audits and if they need to visit any subcontractors. The auditor will set a time limit for your company to provide any necessary records.

In addition to your appointed Chain of Custody contact person, we recommend inviting a few other members of staff to this meeting, such as the internal auditor. Use the opening meeting to clarify any questions you have regarding your audit or the certification process.

Audit duration

The duration of the audit will vary depending on the number of sites to be visited, the complexity of your operations, your activities related to certified seafood, and the number of species you intend to buy and sell as certified.

Traceability tests

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

During the audit, the auditor will:

Check

- The measures taken by your company and any subcontractors to segregate, identify and prevent mixing between certified and non-certified seafood.
- The permission to use the MSC label and ASC logo by asking for proof of approved packaging designs covered by a valid licence agreement (see page 16 of this guide for more information).
- Non-certified ingredients used have been correctly calculated (where applicable).

Review

- The management system/s for each activity in scope.
- The content and implementation of written procedures (i.e. approved buying lists, training manuals).
- The contract processing of certified seafood for others (if applicable).
- The records showing purchase, receipt, sale and physical handling of certified species.
- The group controls, schedule and internal audit outcomes.

Interview

- 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).

Verify

- Your company's and any subcontractor's records, where relevant:
 - 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.
- Your company complies with the relevant MSC labour eligibility requirements.

Audit closing meeting

At the end of the audit, the auditor will call a closing meeting to summarise their findings. 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.



STEP 4 After the audit

Once the auditor has completed the audit across your group's central office and all sites visited, they will conclude their findings and summarise any non-conformities. Your auditor will send you a summary of all audit findings within 10 working days that will detail any non-conformities raised by the auditor.

Non-conformities

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

Table 1: Required actions for non-conformities at site and central office audits.

	At site audits	At the central office audit	Required actions
Minor non-conformities	A system breakdown unlikely to result in non-certified product sold as certified.	A partial lapse or partial breakdown of activities related to one element of the company's management or internal auditing system.	Send the certification body an effective action plan with corrective actions within 60 days from the closing meeting. Your company will not be certified until the non-conformity has been effectively addressed.
Major non-conformities	A system breakdown likely to result in non-certified product sold as certified.	A breakdown of activities related to one element of the company's management or internal auditing system.	Send the certification body an effective action plan with root cause analysis, corrective actions and an appropriate timeframe to address them, in order for the certification body to close-out the non-conformity within 90 days of the initial audit. If this cannot be done, your company will need to have another initial audit.
Critical non-conformities	Non-certified product was found to be sold as certified.	A complete breakdown of the company's management system so that site conformity with the standard cannot be relied upon.	Must be corrected before certification can be granted.

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 send you a finalised version of the audit report 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 to your unique chain of custody code in the MSC Chain of Custody Scheme database covering scope, subcontractors, suppliers, audit date, the final audit report, and your certificate.

Congratulations, you're certified!

Once certified, your status should appear as valid on the [MSC Find a Supplier directory](#) and/or [ASC Find a Supplier directory](#). You can now officially sell MSC and/or ASC certified seafood.

The MSC and ASC Find a Supplier directories are the official sources of certificate validity. Companies that do not appear with a valid Chain of Custody certificate status on these directories cannot be used as a certified supplier. The audit report and confidential information will not be displayed on the MSC and ASC Find a Supplier directories.

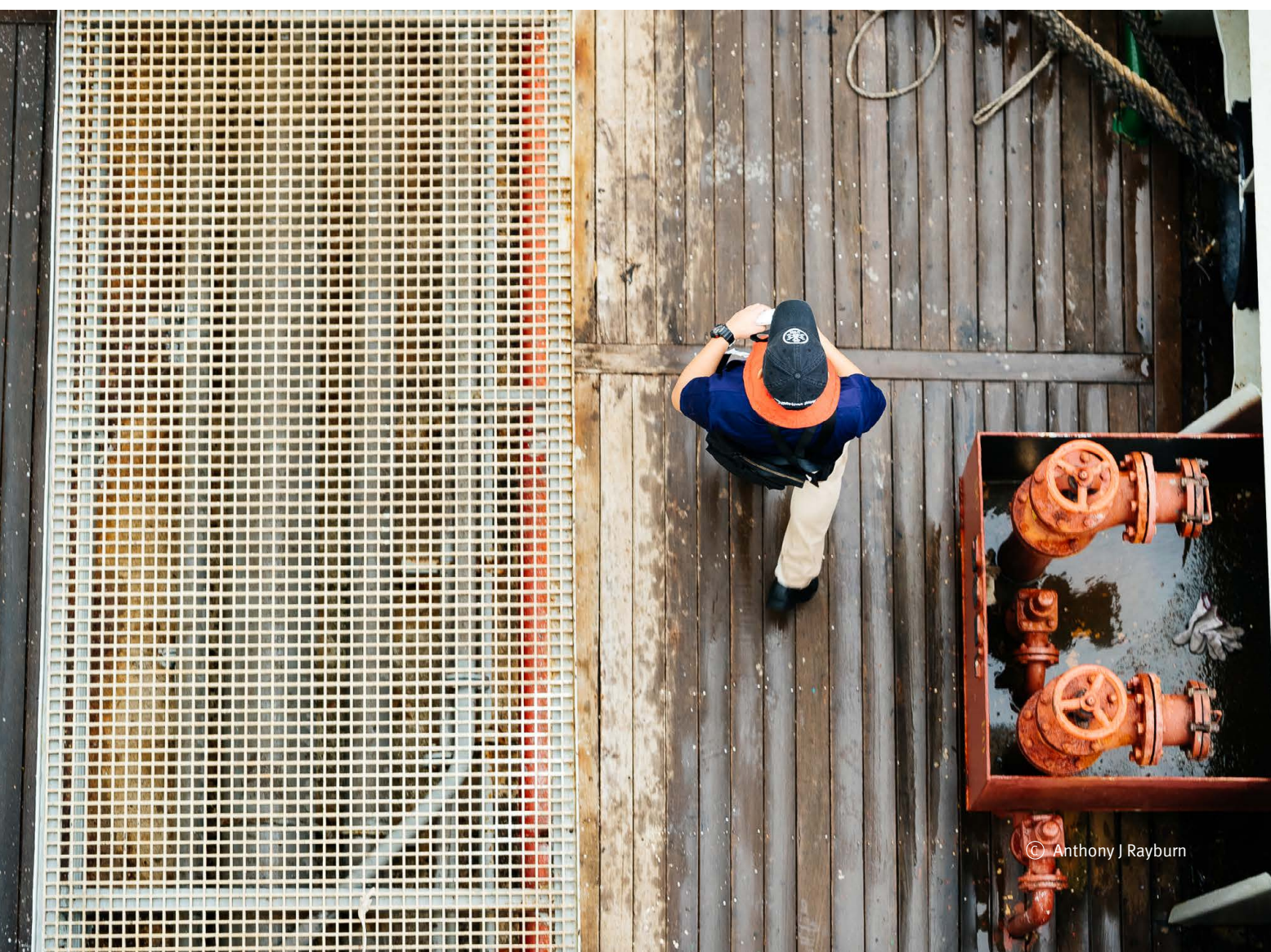


STEP 5 Using the MSC and ASC trademarks to sell certified seafood

Your company must sign a 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 end consumers or used by business customers for promotional purposes.

The licence agreement may be signed whilst your company is an applicant for certification. This enables your company to acquire high-definition files of the MSC ecolabel and/or ASC logo to use in packaging design. In addition to signing a licence agreement, your company will have to submit the packaging designs and a completed [Product Approval Form for both the MSC and ASC](#) containing information about the product you intend to sell with the MSC and/or ASC trademarks. If you are using the ASC logo for business-to-business trading, you will also need approval. You do not need approval if you use the MSC and/or ASC acronyms for traceability, identification or internal training purposes.

Visit [msc.org/msc-label](https://www.msc.org/msc-label) or [asc-aqua.org/business/our-label](https://www.asc-aqua.org/business/our-label) for more information.



Maintaining certification

Your certificate is valid for three years. During this period, your company will receive surveillance audits. Re-certification audits take place every three years.

Internal audits and annual reviews

Internal audits are required on an annual basis. The purpose of these internal audits is to ensure the group continues to conform with the Chain of Custody Standard: Group Version, and to assess the effectiveness of the group's management system.

Annual internal audits are applicable to all sites except those only handling certified seafood and those that received an external audit from your certification body within the last 12 months with no non-conformities found. These internal surveillance audits can be done remotely or on-site. Internal group reviews are also required on an annual basis, and these can be carried out by the central office, by sites, or a mixture of both.

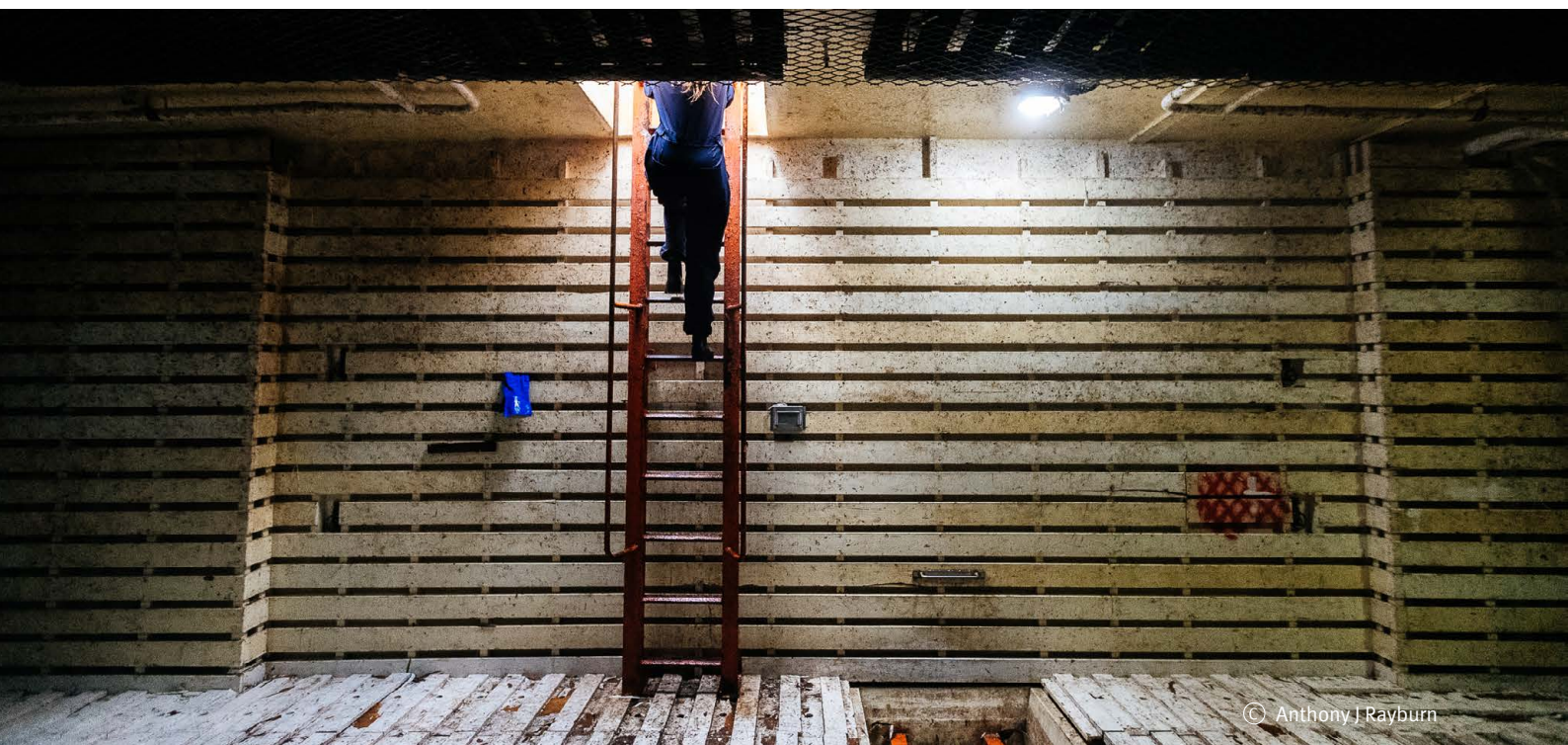
Surveillance audits

Surveillance audits are annual for all Group certificates. Surveillance audits can be conducted 90 days before or after the audit due date giving you flexibility to schedule a date that's convenient.

Site visit

The number of sites to be visited at the surveillance audits is the same or fewer than at the initial audits. Check the pre-audit checklist or ask your auditor how many site visits are due.

There is a small chance that your company will receive an unannounced 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). An unannounced audit will replace your next scheduled surveillance audit.



Non-conformity at surveillance

During the surveillance audit, the auditor may raise a non-conformity where there is a deviation from the Standard.

Table 2: Required actions for non-conformities at surveillance audit.

	At site audits	At the central office audit
Minor non-conformities	<p>Within 60 days from the closing meeting, send an effective action plan and proof that the non-conformity has effectively been addressed to the certification body. Minor non-conformities can be upgraded to major and corrected as such if not effectively or timely managed.</p>	<p>Must be corrected within 90 days.</p> <p>If not corrected within this timeframe, the non-conformity will be regraded as a major against the central office.</p>
Major non-conformities	<p>Send the certification body an effective action plan with root cause analysis, corrective actions and an appropriate timeframe to address them. Once the corrective actions are implemented, your certification body will be able to close out the non-conformity within 30 days of the audit. If this cannot be done, the site must be suspended from the Group certificate.</p>	<p>Must be corrected within 30 days.</p> <p>If not corrected within 30 days, the non-conformity will be re-graded as a critical against the central office and the group suspended.</p> <p>Send the certification body a corrective action plan with root cause analysis.</p>
Critical non-conformities	<p>The site must be suspended immediately from the Group certificate.</p> <p>Must be corrected within 4 days.</p>	<p>The Group certificate will be suspended immediately.</p>

Certificate suspension

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

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

- A critical non-conformity has been raised against the central office.
- The threshold of major non-conformities has been exceeded.
- The company does not agree to a surveillance or re-certification audit within the necessary timeframes.
- The MSCI has withdrawn a company's licence agreement and the company did not follow MSCI's instructions.
- The company does not comply with the MSC Labour Eligibility Requirements.

Regardless of the cause, from the day of suspension product cannot be sold as certified and you must inform your customers in writing of your suspension. For a suspension to be lifted, a corrective action plan, including a root cause analysis, must be accepted by your certification body and implemented by your company.

What to do when non-conforming products are found in your company?

Where your company finds mislabelling or non-conforming product and reports it to the certification body, the certification body will not suspend your certificate if you followed the non-conforming product procedure correctly, as this shows that you are willing to maintain product integrity. If the mislabelled or non-conforming product recurs, your company may be suspended.

GOOD TO KNOW

A certificate can become invalid at any point if a company is found to have been convicted of forced or child labour in the last two years.



Complying with requirements on labour eligibility

The MSC and ASC have introduced eligibility requirements so that MSC/ASC products are not associated with forced or child labour. This means that you may need to complete a self-assessment of sites in your certificate prior to receiving your Chain of Custody audit and listing your certificate on the MSC or ASC website.

If any part of your company has been convicted of a forced or child labour violation in the last two years, you will not be eligible for certification.

Additionally, if your potential certificate covers certain activities, you will need to complete an [MSC Chain of Custody Labour Self-Assessment form](#) and sign an agreement to undergo an MSC-commissioned labour audit if asked.

The self-assessment details the policies, practices and measures in place to prevent or reduce the risk of forced and child labour and covers all applicable sites and subcontractors within the certificate scope. You are required to provide the necessary information to the certification body showcasing the policies, measures, and practices in place to mitigate forced and child labour.

- | | |
|------------------------|-------------------------------|
| – Contract Processing | – Secondary Processing |
| – Manual off-loading | – Processing - preservation |
| – Packing or repacking | – Other Processing activities |
| – Primary Processing | – Use of subcontractors |

On-site labour audit requirements:

- The labour audits should cover all applicable sites and subcontractors within the certificate scope.
- If sites in your certificate participate in a recognised labour audit program they are not required to submit a self-assessment.

Labour audit programs recognised by the MSC	Within these programs, you will have to meet these performance criteria
Amfori Business Social Compliance Initiative	No Zero Tolerance issues
SEDEX SMETA	No Business Critical Issues
Social Accountability International's SA8000	A valid SA8000 certificate
BRCGS Ethical Trading and Responsible Sourcing Standard (ETRS)	Hold a valid BRCGS certificate
SSCI recognised program (manufacturing and processing)	Hold a valid certificate of the recognised program

Zero Tolerance and Business Critical issues are serious labour issues that require immediate action. You can find out more about the [amfori BSCI Zero Tolerance Protocol](#) and the [SEDEX-SMETA Non-Compliance Guidance](#) on their websites.

You will need to follow the audit schedule set by the labour audit program you choose. The audit might be every six months, year or two years. Regardless of whether the recognised third-party audit program allows audits every two years, the minimum audit frequency to meet MSC performance criteria is annual.

For more information on the self-assessment and third-party labour audit requirements, please refer to the [MSC Labour Eligibility Requirements v1.0](#).

Why did the MSC choose these labour audit programs?

The MSC chose to recognise these programs because they are:

- globally recognised
- commonly used in the seafood industry.

How will you demonstrate to your Chain of Custody auditor that you comply with the relevant programs (when applicable)?

To show that you comply with the relevant labour audit programs, you may be asked to provide a certificate to your auditor. You may also need to log onto the program's platform or portal.

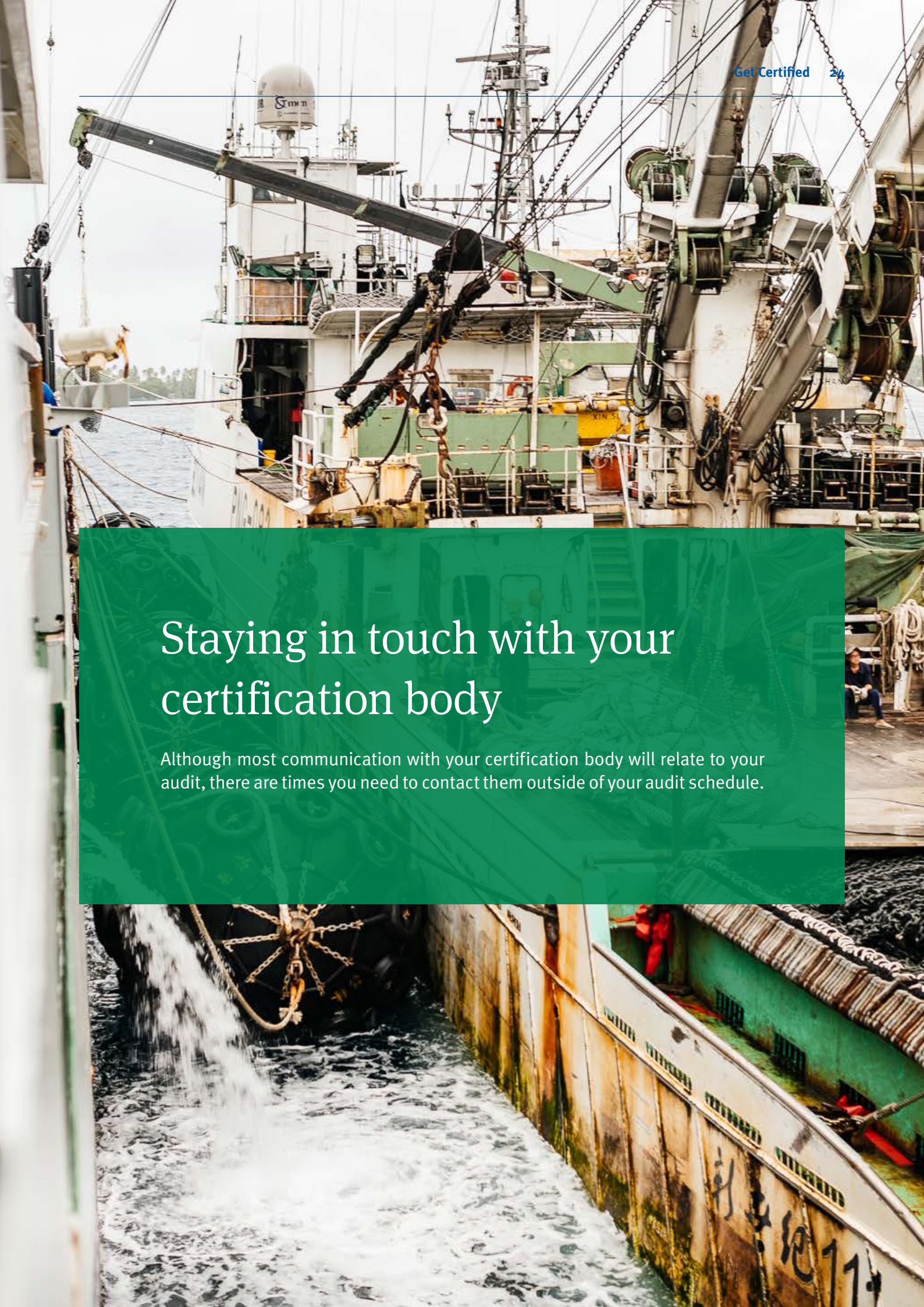
Social compliance audits and access to this platform may be the responsibility of another individual at your company. If this is the case, you need to make sure that person is available on the day of the Chain of Custody audit to show the labour audit findings.

What happens if you do not comply?

If you opt for a labour audit, and at any point you do not meet the labour performance criteria in the Labour Eligibility Requirements (for example a Zero Tolerance Issue is found during your amfori BSCI audit), then you must inform your certification body within two working days. You will then have 30 days to address the issue to maintain your Chain of Custody certificate.

Staying in touch with your certification body

Although most communication with your certification body will relate to your audit, there are times you need to contact them outside of your audit schedule.



Informing your certification body about changes

You will need to inform your certification body if you:

- Find non-conforming product (within 2 days).
- Receive a new certified species (within 10 days).
- Receive certified product by a new supplier (within 10 days).
- Appoint new staff as your Chain of Custody contact person (within 10 days).
- Failed to meet the labour performance criteria in the Labour Eligibility requirements (for example a Zero Tolerance issue is found during your amfori BSCI audit) (within 2 days).
- Add less than or equal to 10% of new sites to the Group certificate (include an updated site list).
- Change certification body.
- Wish to complain about your auditor or certification body.

Request approval from your certification body if you plan to:

- Add more than 10% of new sites to the Group certificate (provide evidence that the sites comply with the Standard).
- Undertake a new activity that is not already in your certificate's scope (at central office or site level).
- Use a new contract processor or packer for certified seafood.
- Buy product certified to a program that shares the Chain of Custody Standard (e.g. ASC).

Scope activity definitions: Your company's activities will be classified in your Chain of Custody certificate. The most common activities and definitions are listed below:

Trading fish (buying/selling)

This is likely applicable to all companies, except for subcontractors that do not take legal ownership of certified product.

Storage

Companies that hold certified product in a storage area.

Transportation

Companies responsible for the transport of certified product they legally own.

Distribution

Companies that receive sealed containers, pallets, etc. of certified product that they do not legally own, that may or may not be broken down into smaller units and deliver them to customers or other members of their group.

Wholesale

Companies that receive sealed containers, pallets, etc. that they legally own and sell to customers or other members of their group.

Packing/repacking

When the packaging is changed but the product remains the same.

Processing

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').

Contract processing

Any certificate holder that carries out processing on behalf of the legal product owner (does not legally own the seafood).

Use of subcontractors

Any certificate holder that uses a certified or non-certified subcontractor to process, repack or transform certified product on their behalf.

Retail to consumer

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.

Restaurant/take away to consumer

Any foodservice situation where the product is prepared on-site and sold directly to consumers.

The Chain of Custody Standards

	Default Version	Consumer-Facing Organisation Version	Group Version
Who is it for?	For single or multi-site organisations trading certified seafood, such as a trader operating from one office or a processor with several factory locations.	For retailers, restaurants, caterers and fresh fish counters of any size looking to sell certified seafood directly to final consumers.	For organisations with a central office and many locations distributing, processing or trading certified seafood such as co-operatives, franchises and vertically-integrated companies.
Record keeping	Records must be kept for 3 years or longer if the certified product's shelf life is longer.	Records must be kept for 18 months.	Records must be kept for 3 years or longer if the certified product's shelf life is longer. The central office/group manager must keep an up-to-date site register.
Audit frequency	All sites have a regular audit. Audits can be onsite or remote at a frequency of 12 or 18 months, depending on risk level of business.	The central office, operations sites and a sample of consumer-facing sites are audited onsite annually. Depending on the CFO's risk level, a certain percentage of sites will be audited at short notice (48 hours).	The central office/group management and a sample of sites are audited onsite annually. The sample size depends on the risk level of the group.
Non-conformities at audits and suspension rules	All sites can have non-conformities raised against them. All sites can be suspended from the certificate separately.	Non-conformities are raised against the central office. Suspension affects the entire CFO certificate. In case of non-certified product being sold as certified as a one-off human error at a site, a major non-conformity is raised rather than an immediate suspension.	Non-conformities can be raised against the individual sites and/or the central office/group management. Suspensions can be specific to a site, strata or the entire group.
Internal audits and reviews	No internal auditing requirements.	Optional internal audits.	Mandatory internal audits and reviews.
Training	All responsible staff must be trained.	Strict training requirements for all responsible staff. Training records must be kept.	All responsible staff must be trained. Training records must be kept.

Get in touch:

Marine Stewardship Council (MSC)

msc.org/commercial-contacts

info@msc.org



[@MSCecolabel](#) [#MSCcertified](#)



[/marine-stewardship-council](#)



[/sustainableseafood](#)

Aquaculture Stewardship Council (ASC)

asc-aqua.org/business/chain-of-custody-standard

assurance@asc-aqua.org



[/aquaculture-stewardship-council](#)



[@asc-aqua.bsky.social](#)

© Marine Stewardship Council 2024

The guide relates to the Chain of Custody Standard: Consumer-Facing Organisation. All details within this document are accurate at the time of publication. This is a guide document only, and if any interpretative issues arise in relation to the content covered in the publication, the text of the English MSC program documents will prevail in all instances.