

CHANGE



ASC Chain of Custody Module Review

Consultation: 29 May – 29 June 2025

Summary report



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ASC CoC Module Review: objectives and scope

The objective of this project is to conduct a revision of the ASC Chain of Custody (CoC) Module.

The following topics are in scope:

- **Human rights** requirements for ASC certified supply chain companies to better align with ASC's vision and mission. This includes compliance verification mechanisms of human rights criteria.
- Inclusion of **humane slaughter** requirements in alignment with the ASC Farm Standard (where slaughter occurs in the first certified CoC site after harvesting).
- Potential improvement to the **food safety** requirement.
- Maintaining **alignment with MSC CoC** requirements to continue the efficiencies of a shared CoC Standard for ASC CoC certificate holders and CABs.
- Add **impact in other areas** if desired, such as digital traceability and improve product supply chains.



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ASC Chain of Custody (CoC) Module Review: initial consultation

Through this consultation, we sought stakeholder input on:

1. The project objectives, scope, justification, timeline and stakeholder engagement plan (Terms of Reference)
2. The main supply chain human rights issues to be addressed and how ASC should tackle them
3. Effective and efficient verification mechanisms for human rights
4. The approach ASC should take in including humane slaughter requirements for supply chain
5. Potential improvement to the food safety requirement
6. Alignment with MSC CoC Review
7. Potential coverage of other topics such as digital traceability and improver products

**Initial consultation for 30 days
(29 May – 29 June)**

**CoC Module v2.0 development and internal
agreement (June – December 2025)**

**CoC Module v2.0 second consultation for
60 days (March-April 2026)**

**ASC governance approval of CoC Module
v2.0 (July – October 2026)**

**CoC Module v2.0 release (Nov 2026),
effective (May 2027)**



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Overview of feedback

Objectives and scope

- Support to include the topics proposed. Ensure the process is inclusive and the result is feasible.

Human rights

- Mixed views on the extent to which human rights should be covered. Cost and complexity is difficult for some companies.

Humane slaughter

- Variety of views depending on stakeholder and region, with some questions on feasibility raised.

Food safety

- Support to maintain the requirement and recognise additional programs. Some companies face challenges with cost, logistics and meeting requirements.

Other topics

- Support for a flexible and inclusive approach to digital traceability
- ASC Improver Programme products could be assured by CoC, digital traceability or both.

ASC actions following consultation



Analysed consultation feedback to formulate proposal elements



Input from ASC market, assurance and leadership teams



Two Technical Working Group meetings on human rights



Draft requirements developed



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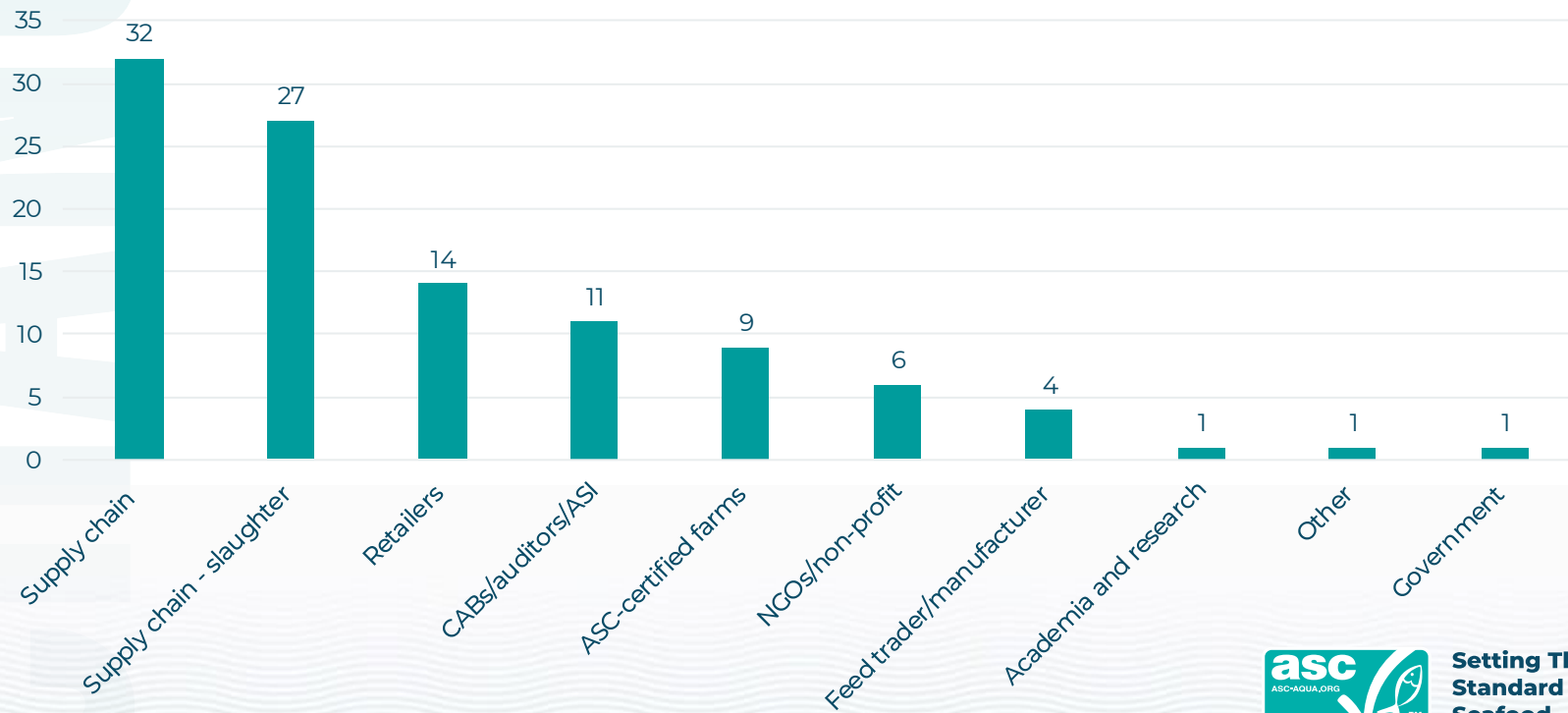
Participation



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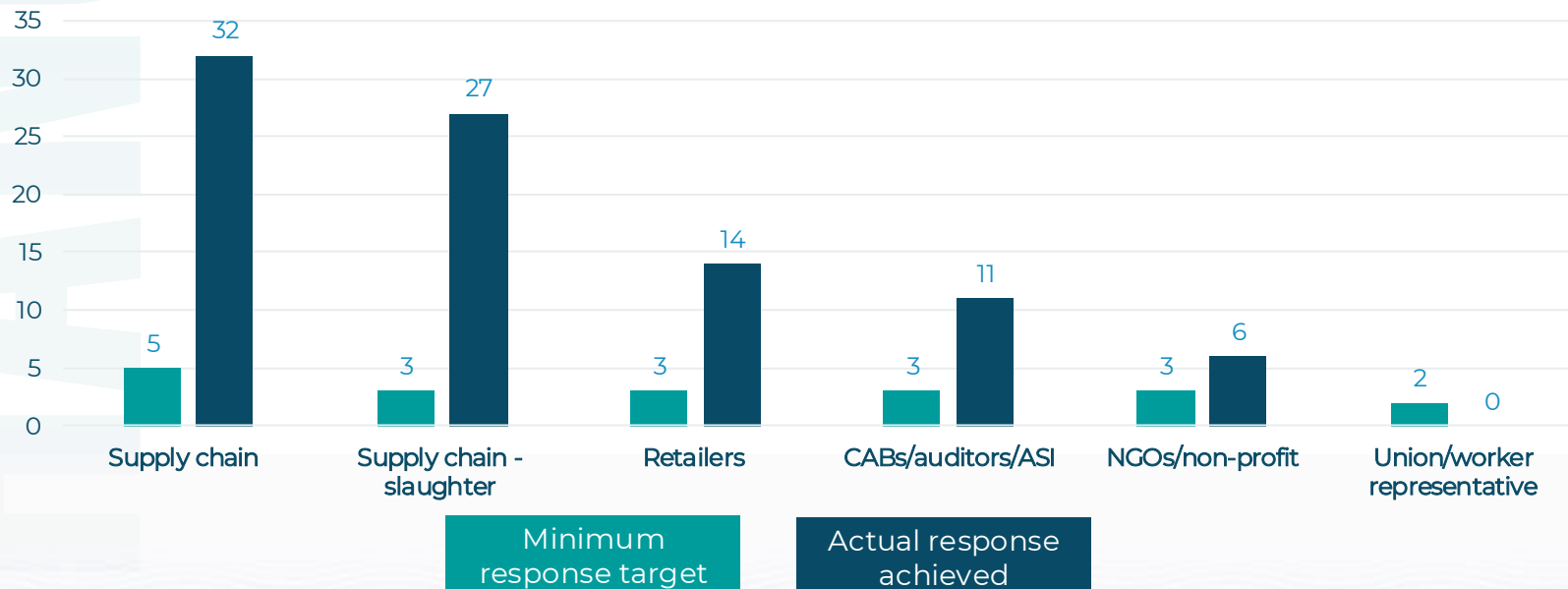
We received 106 responses to the consultation survey

Surveys were received from a range of stakeholder types



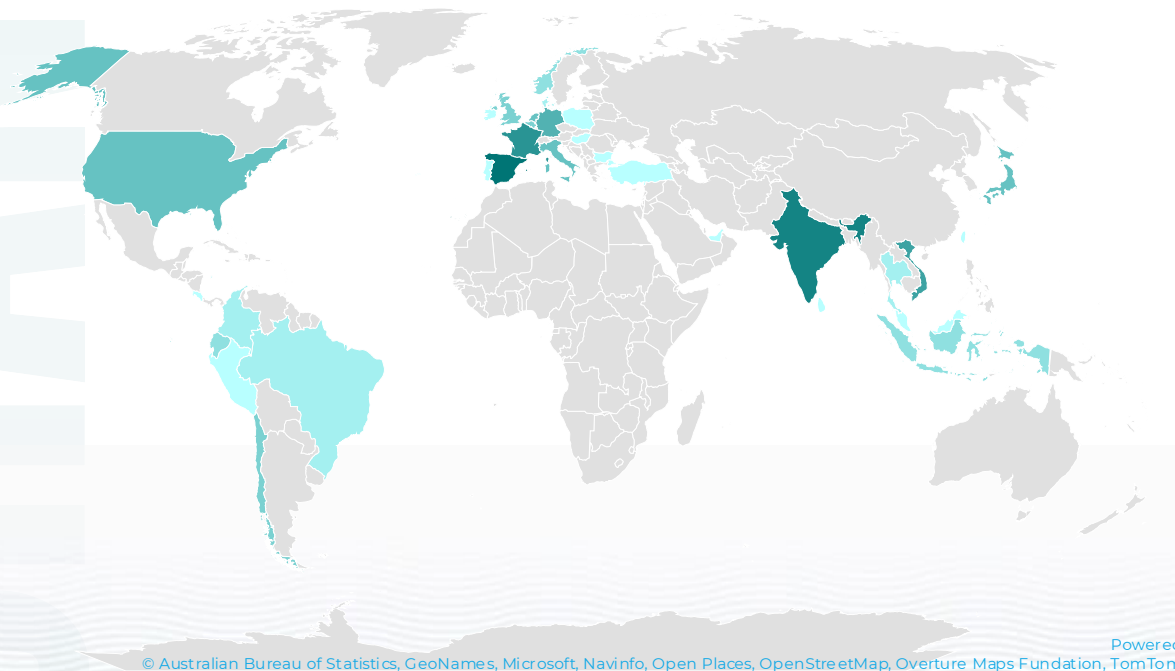
Progress against engagement targets: 106 responses

We exceeded our engagement targets for all groups except union/worker representatives



Participation: country

We achieved strong global representation across consultation participants, including countries with high numbers of CoC certificates



Top participating countries

1. Spain:
10 responses
2. India:
9 responses
3. France:
8 responses

Project objectives, scope and governance



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Objectives and scope: topics included

Q Do you agree with inclusion of the following topics? (Yes responses)



Objectives and scope: summary of stakeholder comments

Support for topics and direction

- Stakeholders welcomed review and support for objectives
- They appreciated ASC's efforts in progressively developing human rights programs across aquaculture supply chains
- They welcomed the inclusion of humane slaughter, digital traceability (if affordable, accessible and GDST aligned)
- Alignment with MSC remains important for CoC certificate holders

Feasibility

- Stakeholders wanted ASC to consider limitations in CoC auditor competence on social/human rights topics
- It was proposed that human rights requirements be based on existing HR standards, industry benchmarks and labour programs
- Respondents suggested audit time would increase and encouraged ASC to avoid increasing cost and complexity

Inclusivity

- Stakeholders said to include minority groups as stakeholders
- They highlighted how higher requirements can reduce accessibility
- The importance of ensuring all stakeholders, especially small-scale producers and local communities, are actively involved in decision-making process was stressed
- Trade unions and worker representatives should also be engaged

Objectives and scope: ASC response

Consultation feedback

1. Support for including the topics proposed in the ToR
2. Ensure the process is inclusive and the result is feasible



ASC response

1. Proposals around these topics will continue to be developed
2. We are considering feasibility as a priority for success. We'll follow up on suggestions and contacts to ensure an inclusive process and result

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Human rights



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Human rights

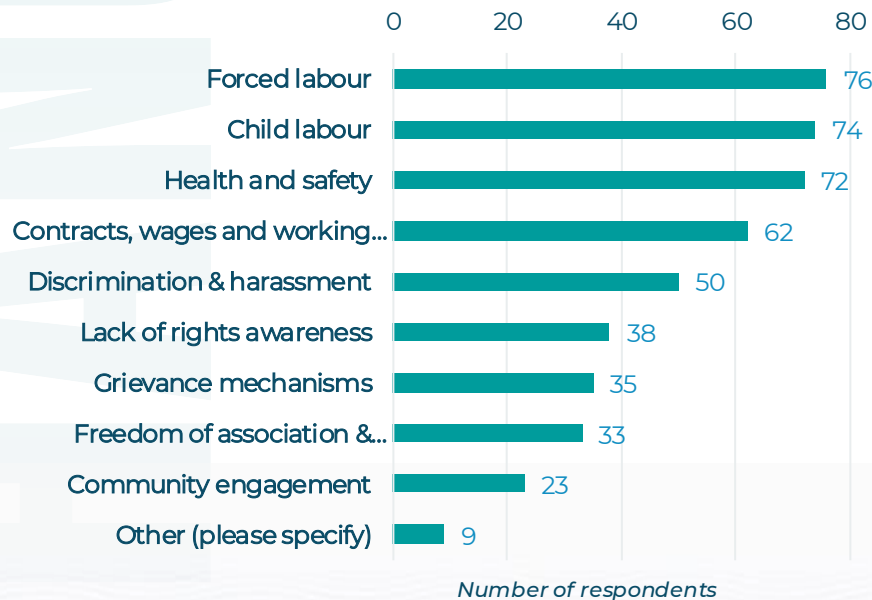
ASC is exploring assurance options for promoting human rights in supply chains

- Our Feed and Farm Standards cover a wide range of human rights topics, including:
 - forced labour, child labour and discrimination
 - health and safety
 - collective bargaining and freedom of association
 - transparent contracts, wages, working hours
 - workplace conduct response
 - employee accommodation
 - community engagement
- Farmed seafood supply chains can be high risk for human rights abuses and poor working conditions.
- CoC Module Review aims to explore which assurance approaches for human rights risks are right for ASC certified supply chains.

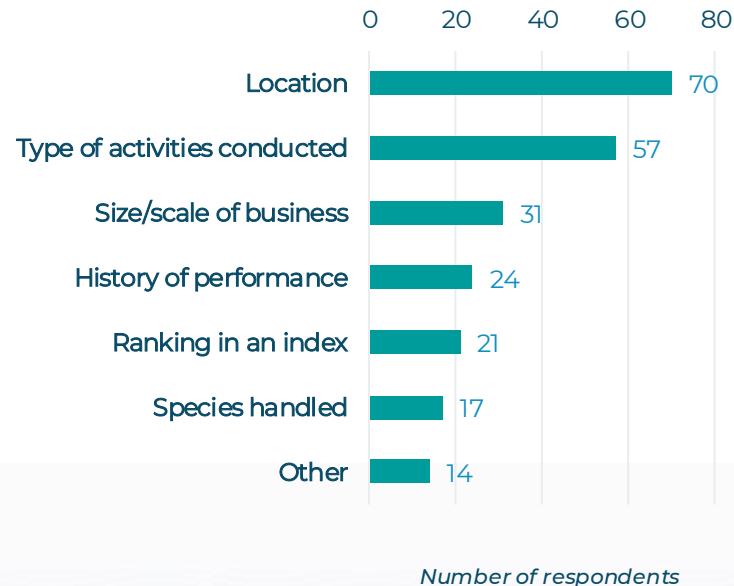


Human rights: priority issues and indicative factors

Q What human rights issues should ASC prioritise addressing in the supply chain? (Select all that apply)

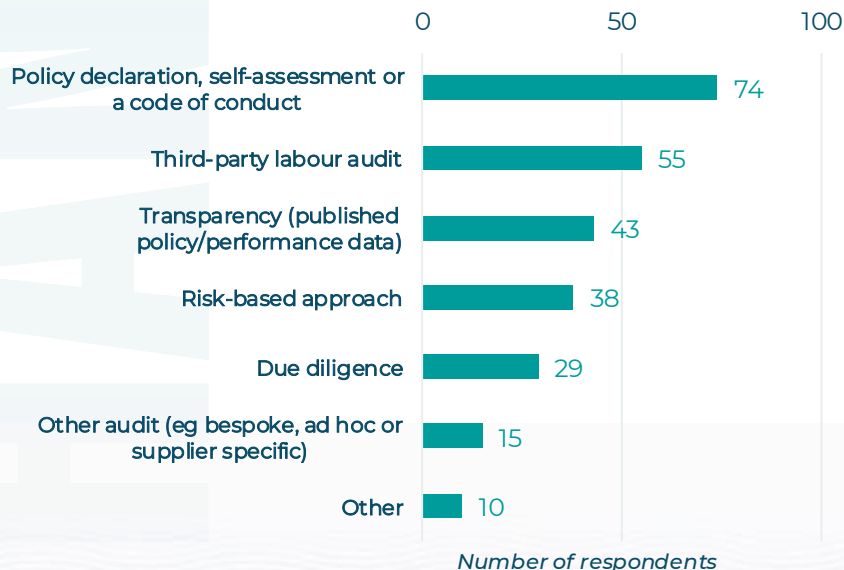


Q Which factors are most indicative of human rights risks in farmed seafood supply chains? (Select all that apply)

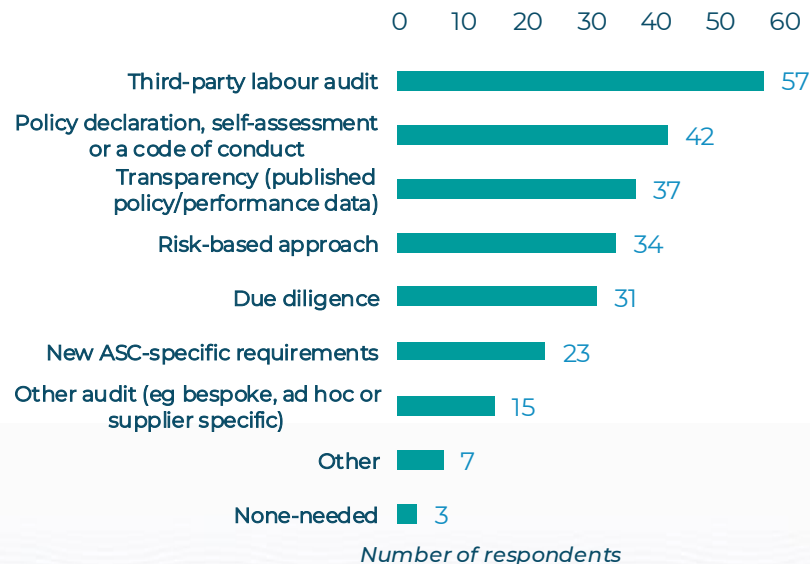


Human rights: current and most effective assurance approach

Q What assurance approach do you or your suppliers currently use to address human rights risks in your seafood supply chains? (Select all that apply)



Q What do you think is the most effective assurance approach to credibly but feasibly address human rights risks in farmed seafood supply chains? (Select all that apply)



Human rights: summary of comments

Human rights risks

- Most stakeholders commented that human rights abuses can take place across the whole supply chain.
- These include forced labour, child labour, abusive working and living conditions.
- Stakeholders, including retailers, a certificate holder and an NGO agreed that credible and robust worker engagement can help to mitigate these risks.

Existing solutions in use

- Many different stakeholders commented on the importance of third-party social audits.
- Several stakeholders (mostly certificate holders) noted a reliance on legal frameworks or their own systems already in place.
- Several stakeholders (including NGOs, certificate holders and retailers) noted the benefits of a risk-based approach and unannounced audits.

Cost and complexity

- Certificate holders acknowledged the cost and burden involved in complex standards and audit systems.
- Some supply chain companies suggested that they did not think that human rights should be part of ASC's CoC programme.

Human rights: ASC response

Consultation feedback

1. Mixed views on the extent to which ASC should include human rights in the CoC Module

2. Cost and complexity is difficult for some producers to handle



ASC response

1. In order to ensure alignment across our programme and to address significant human rights risks in farmed seafood supply chains, ASC will move forward with the inclusion of this topic in the Module.

2. ASC understands that any requirements included need to be feasible for producers and auditors, as well as effective, and is looking at a range of different options, supported by external expertise.

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Humane slaughter



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Humane slaughter

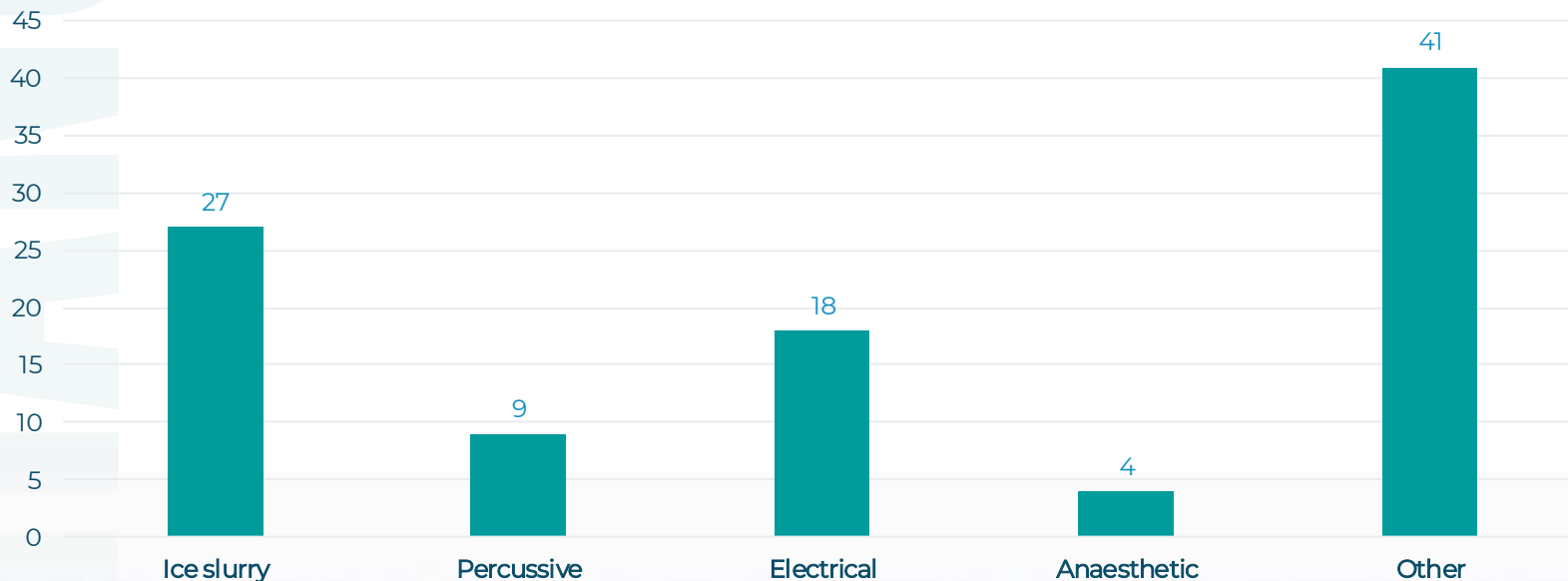
ASC is proposing an assurance approach for off-farm slaughter

- Slaughter can occur outside of the farm Unit of Certification in the post-farm supply chain, for example at the first processor.
- To ensure that slaughter is conducted humanely regardless of where it occurs, the relevant ASC Farm Standard requirements 4.1.3 & 4.2.3 for humane slaughter of fish and crustaceans will apply to supply chain companies that conduct slaughter.
- ASC proposes that off-farm slaughter will be audited by an ASC farm auditor, with the CoC auditor to verify a report demonstrating compliance.



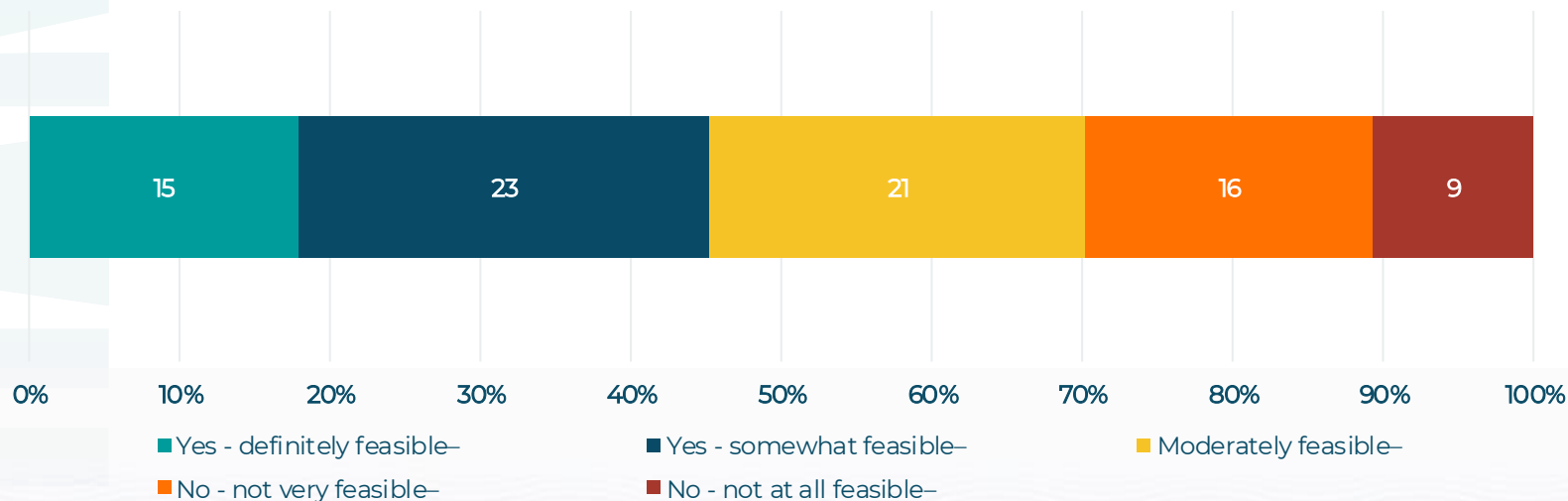
Humane slaughter: current methods

Q What slaughter method do you currently use?



Humane slaughter: feasibility of auditing approach

Q When slaughter occurs outside of the certified farm, ASC proposes it will be audited by ASC farm auditors, with the CoC auditor to verify a report demonstrating compliance. Do you find this approach feasible?



Humane slaughter: summary of comments

Feasibility

- Many saw the proposal for assuring off-farm humane slaughter as somewhat or moderately feasible
- However it depended heavily on existing infrastructure, supply chain logistics, and farm size
- Some ASC farms and certain supply chain actors found it feasible if processes are already in place (e.g., ice slurry, percussive/electrical stunning, pre-processing integration)
- Others saw it as not feasible where slaughter sites are far from farms, facilities are small, or documentation and audits could be burdensome

Barriers

- Stakeholders highlighted logistical factors: distances between farms and slaughter facilities, coordination between multiple actors, transport under humane conditions
- Infrastructure gaps were also addressed: smaller or rural facilities may lack stunning equipment or flexible processing options
- Respondents raised the audit and verification burden: additional site visits, documentation, and coordination with third-party slaughter sites add complexity and cost
- Some respondents noted that slaughter outside certified sites or farms creates CoC challenges and risks

Views vary by stakeholder type

- ASC farms were more optimistic if processes are already in place; feasibility tied to existing compliance and proximity to slaughter
- Supply chain actors and retailers were generally supportive but raised cost, scheduling, and logistics challenges
- NGOs pushed for stronger welfare integration into standards but acknowledged practical limitations
- Government and other stakeholders highlighted legal, technical, and auditing challenges
- Views also varied by region

Humane slaughter: ASC response

Consultation feedback

1. Questions on feasibility
2. Variety of views depending on stakeholder and region



ASC response

1. ASC will consider the suggestions made to improve feasibility such as clear procedures/ guidance from ASC, importance of cooperation/ coordination between parties, and staged or flexible implementation to allow adaption
2. ASC will factor in differences in stakeholders and regional perspectives to try to refine the approach to be globally suitable

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Food safety



2-3 kg
Superior Superior Superior
10.34 Kg
78928
2471453/2



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Food safety

ASC sought feedback on the food safety requirement

- The CoC Module food safety requirement is for ASC CoC-certified processors and packers to be certified to a GFSI-recognised scheme or ISO 22000, unless they meet the exemption based on size.
- A majority of certificate holders have been able to meet this requirement. However, ASC sought feedback from companies that have challenges with the requirement.
- ASC was specifically interested in input from affected companies on what would improve the food safety requirement to make it more feasible.



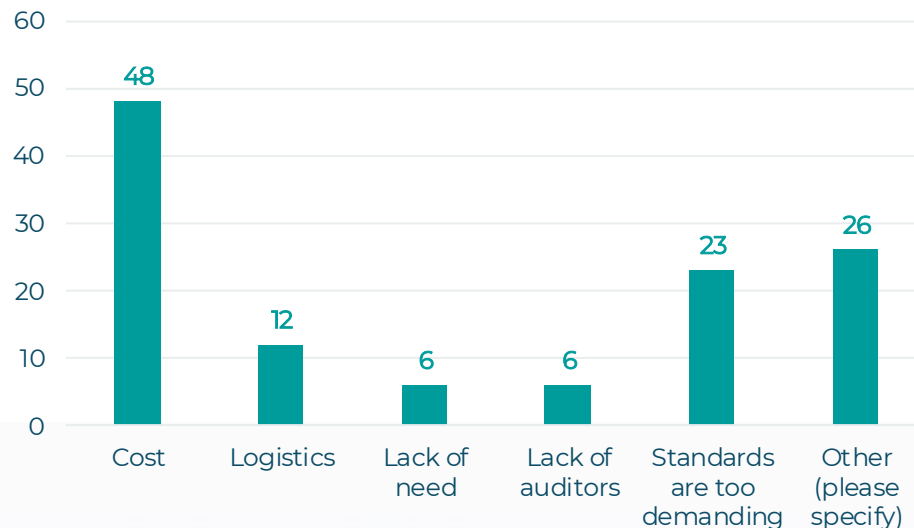
Food safety: main challenges

Q Do you face challenges in meeting the food safety requirement?



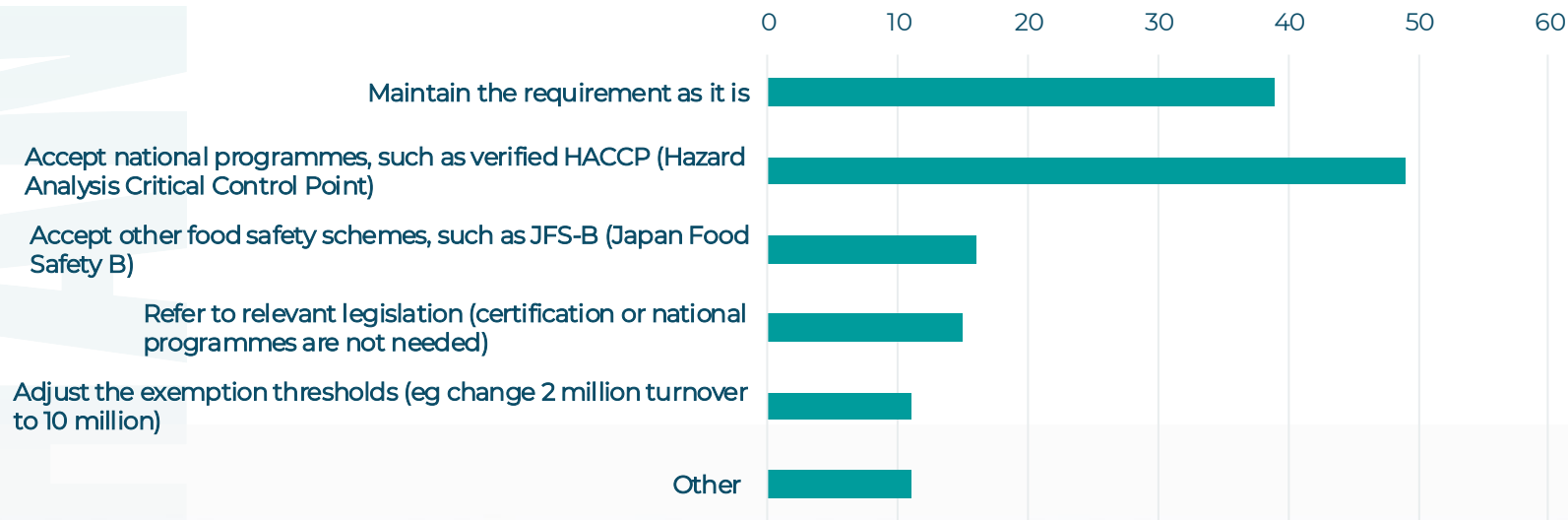
■ Yes ■ No

Q What are the main challenges in meeting the food safety requirement?



Food safety: main challenges

Q What do you recommend as a solution regarding challenges with the food safety requirement?



Food safety: summary of comments

Support to maintain requirement

- Majority of respondents said they do not face challenges with the food safety requirement
- Several respondents supported maintaining the requirement as it is
- Some responses indicated that coverage of food safety through recognition of existing certifications is appropriate

Recognition of other schemes

- Many responses (80) suggested additional programs could be recognised
- Some responses supported recognition of HACCP, particularly in Japan
- Several responses suggested that various national programs could be recognised
- Some suggested that specific schemes should be recognised, including those that are already GFSI-recognised such as BRC, BAP and IFS

Challenges

- Some noted challenges for small companies or those with strict government regulations where certification is perceived to be less relevant
- Challenges could relate to cost, meeting a high bar and logistics
- One response suggested a tiered compliance model to support small and medium enterprises in progressively reaching full certification

Food safety: ASC response

Consultation feedback

1. Support to maintain the requirement, however additional programs could be recognised
2. Some companies face challenges with cost, meeting a high bar and logistics



ASC response

1. ASC has and will continue to evaluate additional programs for acceptable equivalence, where there is sufficient demand
2. There is an exemption provided for small businesses and there has been an extended transition period. ASC proposes to maintain the requirement but to modify it based on feedback

MSC alignment, digital traceability and improver products



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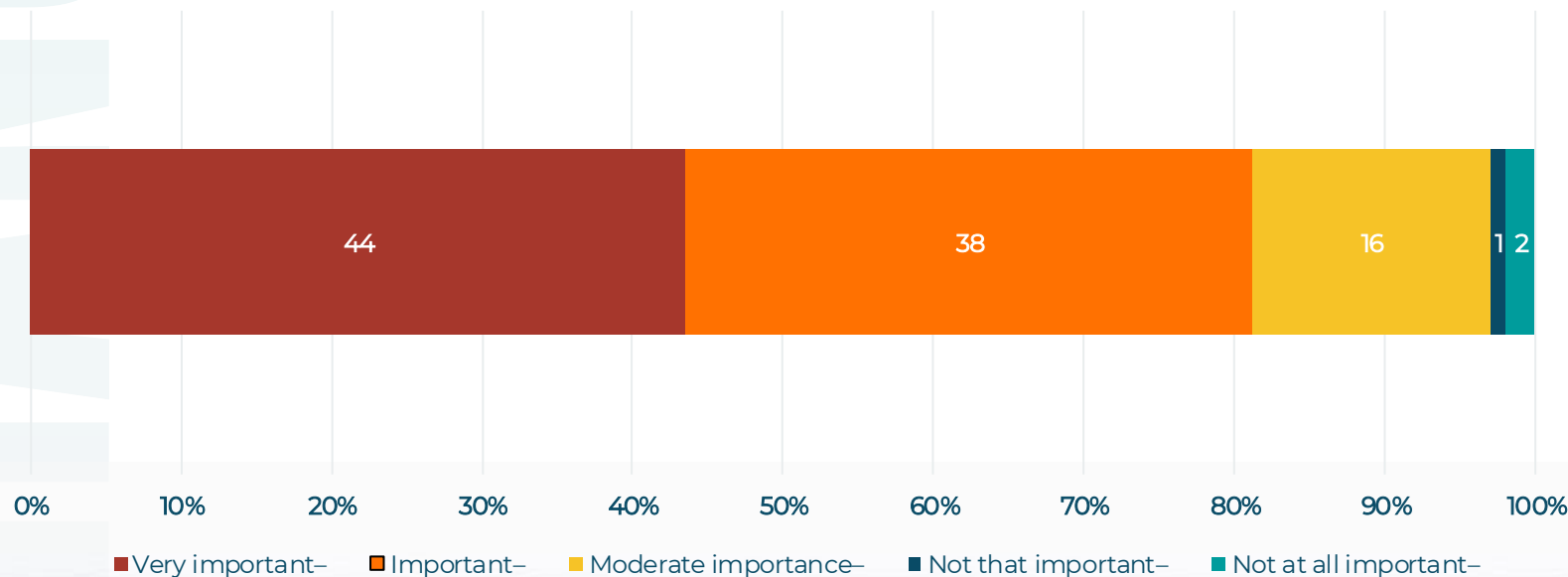
MSC alignment, digital traceability and improver products

- o **MSC CoC alignment:** The review will aim to maintain alignment with the **MSC/ASC shared [CoC Standard](#)** as much as possible, to continue the efficiencies of a shared standard for certificate holders and CABs. ASC sought input on the importance of this alignment to partners.
- o **Digital traceability:** Expanding more detailed requirements on the use of **digital traceability** systems will also be considered. This relates to the **[TraceASC project](#)** that is pioneering digital traceability by capturing and conveying Key Data Elements (KDEs) from certified entities throughout the supply chain.
- o **ASC Improver Programme products:** ASC is also considering supply chain traceability and assurance for products originating from **[ASC Improver programme](#)** farms. Input was invited on the best approach for these products in the supply chain.



Other topics: MSC and ASC alignment

Q How important is it that CoC requirements are aligned between MSC and ASC supply chains?



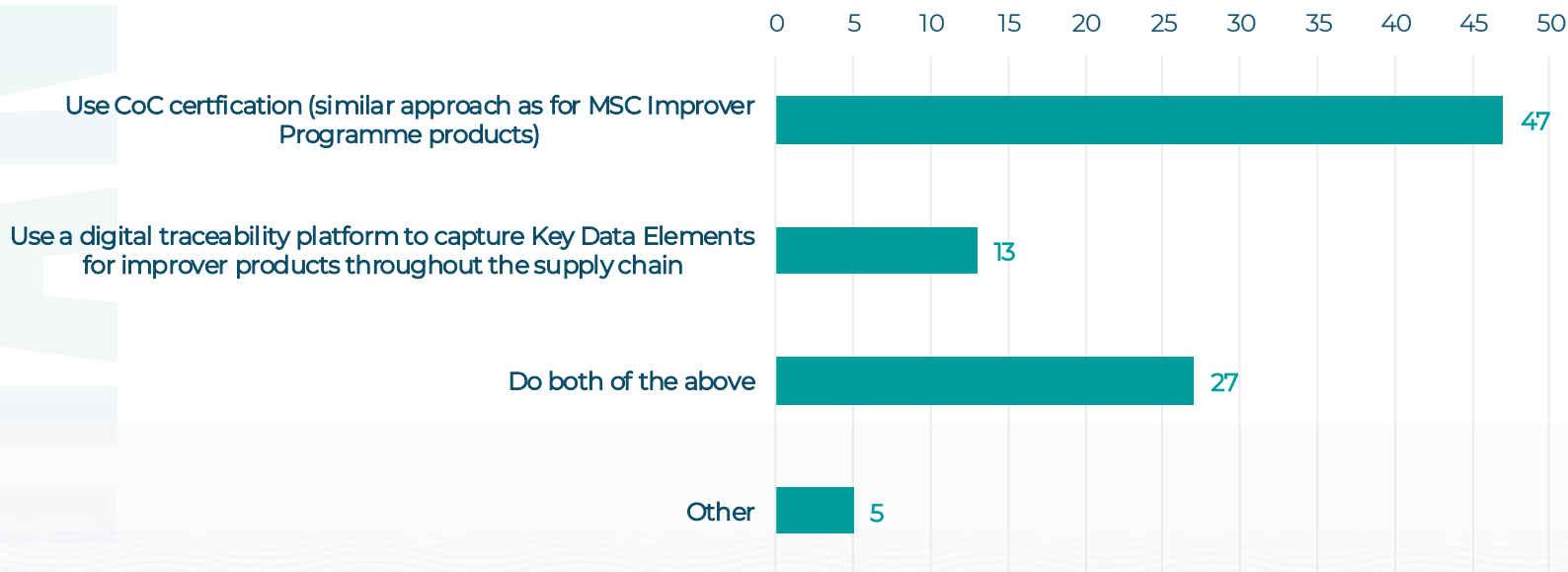
Other topics: digital traceability

Q Should ASC expand requirements to use digital traceability systems as part of the review of the ASC CoC Module?



Other topics: ASC Improver Programme

Q How should supply chain assurance be delivered for products originating from ASC Improver Programme farms?



Additional topics: summary of comments

MSC alignment

- Most responses considered MSC-ASC alignment on CoC requirements very important or important to minimise burden and complexity and maximise efficiency and consistency
- Some comments indicated additional requirements where needed are acceptable and appropriate, such as for human rights

Digital traceability

- Most responses supported use of digital traceability systems as they can allow more precise, efficient and reliable tracking of products throughout the chain
- Digital systems should be encouraged, but utilising a certain system should not be a barrier to market access
- Some stated that requiring use of digital systems could limit accessibility, flexibility should be maintained for smaller businesses with limited technical capacity
- For some, regulations already require digital traceability

ASC Improver Programme

- Most responses supported using CoC certification for ASC Improver Programme products, however many also supported using a digital traceability system, or both
- They suggested using a known practical system that is already in place (CoC)
- Stakeholders noted that traceability and assurance for improver programme products will help build trust, but also the need to clearly differentiate between AIP to ASC and AIP to best practices

Additional topics: ASC response

Consultation feedback

1. Support for a flexible and inclusive approach to digital traceability
2. Traceability and assurance for ASC Improver products will help build credibility and trust, by using CoC certification and/or digital traceability



ASC response

- ASC intends to build digital traceability into certified supply chains, while supporting flexible approaches to data entry, interoperability with various platforms and allowing sufficient transition time
- 1.
- ASC will consider the input received and will aim to balance the advantages and disadvantages of different approaches
- 2.

Thank you



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