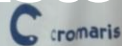




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ASC Chain of Custody Module Review



2nd consultation: 2 March – 2 May 2026

Contact: assurance@asc-aqua.org



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Share your views!

Consultation open 2 March - 2 May

- [Find the consultation survey link here](#)
- Sign up to our stakeholder Q&A sessions:
 - [23 March: 10:00 UTC](#)
 - [23 March: 17:00 UTC](#)
- [Review the revised Module and more information here](#)



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ASC Chain of Custody (CoC) Module Review

Contents

- Introduction
- Proposals for consultation:
 - Human rights
 - Humane slaughter
 - Food safety



This product comes from a farmed fish that has been independently certified to meet the ASC standard for responsibly farmed seafood. For more information, visit www.asc-aqua.org (ASC-C-00894)



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Introduction



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ASC CoC Module Review: overview

This is the second consultation on the review of ASC CoC Module

Through this consultation, ASC seeks stakeholder input on the feasibility and effectiveness of proposals on:

1. Human rights
2. Humane slaughter
3. Amendments to food safety
4. Other changes to traceability and conformance
5. Supply Chain Module document

Initial 30-day consultation (Jun 2025)

Revised Module proposal development
(Jul 2025 – Jan 2026)

**2nd Module review consultation for 60 days
(Mar – May 2026)**

Feasibility testing, impact analysis
(Apr - Jul 2026)

Prepare final draft for ASC governance approval
(Aug – Oct 2026)

Revised 'ASC Supply Chain Module' launch (Nov 2026,
effective May 2027)



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ASC CoC Module Review: background

The ASC CoC Module added requirements to the MSC CoC Standard

- The ASC CoC Module added requirements to MSC CoC which were designed to strengthen assurance and value of ASC certified products by addressing seafood fraud, food safety, legality, detection of substances and use of technology.
- The ASC CoC Module development began in 2019. The Module was released in May 2022 and became effective in May 2023, with a one-year grace period for the food safety requirement.
- Both the MSC CoC programme and the ASC CoC Module are currently under review.
- In June 2025 ASC held an initial consultation on the CoC Module Review Terms of Reference and the formation of a Technical Working Group for human rights.



ASC CoC Module Review: objectives

The main objective is to review the Module with the following topics in scope:

New human rights

requirements for ASC certified supply chain companies

New humane slaughter requirements

when applicable in the supply chain

Improved food safety requirement

Other Improvements:
MSC CoC alignment, digital traceability, improver products

Please see the [ASC CoC webpage](#) for more project resources, including the project [Terms of Reference](#)



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ASC CoC Module Review: 2025 initial consultation input

Stakeholders gave us the following feedback:

Objectives and scope

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

Human rights

- Acknowledged as an important area for ASC, 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.

[Read the 2025 consultation summary report](#)

Following initial consultation, ASC has:

- Analysed consultation feedback to formulate proposals
- Gathered input from ASC market, assurance and leadership teams
- Two Technical Working Group meetings on human rights
- Draft requirements developed

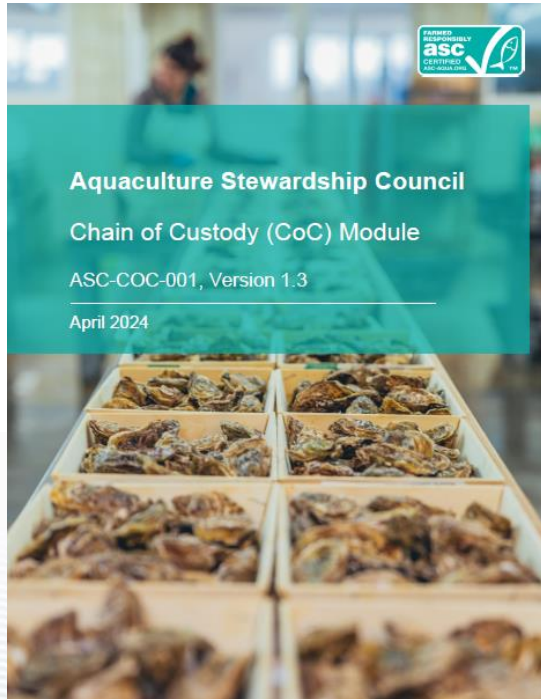


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ASC CoC Module Review: new document title

The ASC CoC Module has become the ASC Supply Chain Module

One output of the review is a change of name from the ASC CoC Module to the **ASC Supply Chain Module**. The new name reflects the addition of requirements for supply chain actors that go beyond traceability.



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Human rights



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ASC
ASC-AQUA.ORG
FRESH ATLANTIC SALMON
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GILL IN 225417
P 14-16
15897 28 09
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ASC's Vision for Human Rights

- We envision an aquaculture industry that is a global force for good — one where the **human rights of employees and local communities are not only respected but actively advanced.**
- We drive industry-wide change by setting the standard for human rights in aquaculture. Through innovation, and collaboration with rightsholders and partners, we create practical tools and strategies that support the implementation of these standards and deliver positive impacts for people.
- More information can be found on ASC's webpage on [human rights in aquaculture](#).



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Human rights: requirements for certified supply chains

Human rights proposals are a significant part of the proposed Module revision

- There is a need to align with Farm and Feed Standards and ASC's vision in relation to human rights, as ASC has steadily developed its human rights programme.
- The MSC CoC Standard does not include a focus on human rights.
- Human rights abuses and poor working conditions are a risk in farmed seafood supply chains, and the topic has been the subject of global media attention.
- ASC proposes to strengthen supply chain requirements on human rights.



Human rights proposals: overview

ASC propose the following requirements for ASC CoC certificate holders

Implement ASC
**Human Rights
Code of Conduct**



Commit to Code of
Conduct, unannounced
assessments, remediation
and transparency

Publish a **human
rights policy** and
ensure **worker
awareness**



Provide **information**
related to human
rights to CoC auditor

Human rights proposals: Code of Conduct



1. **Supply chain companies would need to implement a Human Rights Code of Conduct, aligned with requirements in the ASC Farm and Feed Standards but simplified, and verified using a risk-based approach. The Code would cover:**

- o Legal compliance
- o Recruitment
- o Forced labour
- o Child labour
- o Discrimination and harassment
- o Health and safety
- o Collective bargaining & freedom of association
- o Contracts, wages and working hours
- o Grievance mechanism
- o Community engagement



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Human rights proposals: commitment



2. Supply chain companies would need to document their commitment to:

- implement the Human Rights Code of Conduct,
- accept unannounced assessments of conformance with the Code by ASC selected agents
- conduct remediation, when deemed necessary as a result of unannounced assessments
- provide public transparency of its human rights policy, and outcomes of unannounced assessments including remediation
- share findings of any third-party labour audits with ASC if requested,
- participate in use of human rights assurance tools if requested by ASC, and
- cover expenses for assessments and remediation processes as applicable

Human rights proposals: human rights policy



3. Supply chain companies would need to publish a human rights policy, disseminated to all workers, covering:

- freedom of association and the effective recognition of the right to collective bargaining
- the elimination of all forms of forced or compulsory labour
- the effective abolition of child labour
- the elimination of discrimination in respect of employment and occupation
- a safe and healthy working environment
- being a good neighbour and respecting the rights of surrounding communities.



4. Supply chain companies would need to provide information related to human rights to the CoC auditor



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Human rights proposals: role of CABs and auditors

ASC propose the following role for CoC CABs and auditors

1. Verify at CoC audits:
 - o the documented company commitment to the Code of Conduct and other elements
 - o the human rights policy is published
 - o that workers are aware of the human rights policy

2. Collect and record data at CoC audits related to human rights, such as worker demographics (this data becomes an input into the ASC data-informed risk tool)

3. Suspend a CoC certificate if ASC determines the organisation has not successfully resolved findings of non-conformance with the Human Rights Code of Conduct, found during unannounced assessments



In the proposal, CoC auditors would not have a role in verifying implementation of the Human Rights Code of Conduct



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Human rights proposals: ASC's role

ASC would identify high risk certificate holders and select agents to conduct assessments

1.

Apply **data-informed risk tool** to identify high risk certificate holders to select for unannounced assessments, including risk factors such as:

- o activities, location, business size
- o performance history
- o use of migrant workers
- o recognition of 3rd party audits and findings
- o new issues that arise -> worker voice inputs

2.

Select qualified agents to conduct **risk-based unannounced human rights assessments** to verify implementation of all or part of the Code of Conduct. Agents could be an NGO, an ASC auditor or a consultant

3.

Be guided by a **transparent process** covering:

- o Relevant risk factors
- o Content and format of assessment reports
- o Best practice approach at assessments
- o Findings and resolution including remediation
- o Timelines and sanctions
- o Publication of outcomes

4.

Provide options for consultant or NGO **support in remediation** processes, when needed

5.

Over time develop supporting **resources and tools** for companies in areas such as worker voice



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Humane slaughter



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Humane slaughter: background

Introducing ASC's animal welfare requirements for humane slaughter at ASC farms to relevant supply chain companies

- The **ASC Farm Standard** contains animal welfare requirements for humane slaughter, namely **4.1.3** for fish & **4.2.3** for crustaceans.
- Slaughter can occur outside of the farm Unit of Certification in the post-farm supply chain, for example at the first processor.
- ASC aims to provide assurance that slaughter is conducted humanely, regardless of where it occurs.

[See here for more information on the ASC Farm Standard](#)



Humane slaughter: proposal

ASC's animal welfare requirements for humane slaughter at ASC farms are proposed to apply to supply chain companies that conduct slaughter

- The relevant ASC Farm Standard animal welfare requirements for humane slaughter, 4.1.3 (fish) & 4.2.3 (crustaceans), are proposed to apply to supply chain companies that conduct slaughter.
- ASC proposes that slaughter that occurs in the post-farm supply chain would be audited and reported on by accredited ASC farm auditors, with the CoC auditor to verify a letter of conformance.
- ASC would witness a sample of audits, conduct its own assessments and may also instruct the CAB to suspend a certificate.
- Annexes 2 & 3 in the draft Module detail the process.



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Food Safety



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Food safety: background and data review

- GFSI-recognised or ISO 22000 certification is required for ASC CoC processors and packers since 30 May 2024
- A limited number of companies prefer/ need to meet the requirement by demonstrating equivalence

ASC reviewed data to inform proposed improvements:

- 1,000+ CoC audit reports reviewed to monitor implementation, patterns by region & food safety scheme, and possible challenges
- CoC suspensions tied to food safety
- Variation Requests for time extensions with evidence of actions in progress
- Feedback from queries & FAQs
- Inputs from initial CoC Module Review consultation



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Food safety: proposal

ASC proposes to maintain the food safety requirement, with amendments:

- move the requirement from eligibility to a clause in the standard, making non-conformities possible rather than direct suspension if clause is breached
- remove requirement for companies to notify their CAB within 2 days if their food safety certification becomes invalid
- include recognition of other food safety programs that ASC has evaluated as **acceptably equivalent** to GFSI-recognised or ISO 22000 certification, for example Japan Food Safety Management B
- increase the exemption threshold by value from €2m to €10m



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Other topics: MSC
CoC alignment, digital
traceability and
improver products



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MSC CoC alignment & other

The review also addresses other topics such as MSC CoC alignment

Maintaining alignment with MSC CoC

- o MSC CoC Review public consultation also begins in March 2026 for 60 days
- o Alignment and removal of some Module clauses where incorporated in MSC CoC
- o MSC propose not to adopt Fraud Vulnerability Assessments
- o Human rights, humane slaughter, food safety are specific to the ASC Supply Chain Module



Other ASC topics

- o Improvements and additions to traceability and conformance sections
- o Greater prominence of digital traceability but only minor modification
- o Improver products are not yet included



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Thank you!



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