

## **ASC Consultations | Chain of Custody (CoC) Module Review**

**Hello**

**Welcome to the final consultation survey on the ASC CoC Module Review. This survey is open until the end of 2 May.**

**If you are a certificate holder, CAB or auditor, please consider your responses from the perspective of the feasibility of implementing the proposed requirement.**

**Please visit the [dedicated consultation webpage](#) for more information.**

**If you have any questions, please contact [assurance@asc-aqua.org](mailto:assurance@asc-aqua.org).**

## Confidentiality policy

\* 1. As part of ASC's commitment to transparency, consultation feedback on standards is made public and accessible on ASC's website.

ASC will publish only the name and affiliation of those who submitted feedback, but it will not attribute individual comments in any way.

Select Yes if you accept these conditions and wish to proceed with the survey.

Yes

No

## About you

\* 2. Name

\* 3. Email

**Email address**

\* 4. Organisation name

\* 5. Stakeholder type

\* 6. In what country are you based?

## Supply chain activity

7. What activities do you conduct?

- Distribution
- Processing
- Retailer
- Slaughter
- Storage
- Trader
- Transportation
- Wholesale
- Other (please specify)

## Select topics to answer

8. What topics are you interested in answering questions about?

- Human rights
- Humane slaughter
- Food safety
- Traceability and conformance

## Human rights

### Human rights: policy and code of conduct

9. ASC proposes that certificate holders will be required to publish a human rights policy, demonstrating a commitment to respecting human rights, and to share the policy with all workers.

To what extent do you agree with this proposal?

Not at all	Mostly disagree	Neutral	Mostly agree	Completely agree
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

10. Please explain your response and describe any expected challenges

11. ASC proposes that all certificate holders be required to commit to a human rights code of conduct, which would be verified using a risk-based approach. The code of conduct would cover:

- legal compliance
- prevention of forced labour, child labour and discrimination,
- provision for collective bargaining and freedom of association,
- wage, contracts, and working hours,
- health and safety,
- grievance mechanisms
- community engagement

To what extent do you agree with this proposal?

Not at all	Mostly disagree	Neutral	Mostly agree	Completely agree
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

12. Please explain your response and describe any expected challenges

13. Which of the following is the most effective proposal?

- The full human rights code of conduct should apply to all certificate holders, with unannounced assessments focused on higher risk certificate holders
- The full human rights code of conduct should apply only to higher-risk certificate holders (e.g. processors, a higher number of workers, high-risk countries)
- Instead of a full human rights code of conduct, ASC should focus on a few limited elements for all certificate holders, such as no forced labour, no child labour and development of grievance mechanisms.
- Instead of a full human rights code of conduct, ASC should focus on a few limited elements only for higher-risk certificate holders, such as no forced labour, no child labour and development of grievance mechanisms.

14. Please explain your response

## Human rights: unannounced assessments

15. ASC proposes that companies be selected for unannounced human rights assessments by ASC's data-informed risk tool.

The tool would consider risk factors such as activities, location, size of business, performance history, use of migrant workers, third-party labour audits and results, and worker voice inputs.

To what extent do you agree with this proposal?

Not at all	Mostly disagree	Neutral	Mostly agree	Completely agree
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

16. Please explain your response and describe any expected challenges

17. Should any other risk factors be considered?

18. ASC proposes to select qualified third-party agents to conduct risk-based unannounced human rights assessments to verify implementation of all or part of the Code of Conduct.

The agent could be an NGO, an ASC-qualified auditor or a consultant.

The assessment would follow a transparent and independent process defined, but not conducted, by ASC.

To what extent do you agree with this proposal?

Not at all	Mostly disagree	Neutral	Mostly agree	Completely agree
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

19. Please explain your response and describe any expected challenges

20. Who should be in the pool of qualified agents selected by ASC to verify the Human Rights Code of Conduct?

- Regional NGOs with local expertise
- ASC Farm Standard social auditors
- Auditors of third-party labour audit programmes
- Independent consultants
- Other (please specify)

21. Please explain your response

22. If ASC determines a CoC certificate suspension is warranted based on evidence of human rights issues which are unable to be corrected or remediated, should it be possible for the CAB or the certificate holder to appeal the decision?

- Yes
- No

23. Please explain your response

24. How should costs of unannounced human rights assessments be covered?

- By the certificate holder receiving the assessment
- Shared by all certificate holders via a modest fee to each
- Other (please specify)

## Human rights: transparency

25. ASC proposes transparency as an important part of the human rights approach, including the publication of human rights policies and outcomes of unannounced human rights assessments. This is intended to support due diligence, drive supply chain collaboration and encourage improvement.

To what extent do you agree with this proposal?

Not at all      Mostly disagree      Neutral      Mostly agree      Completely agree

26. Please explain your response and describe any expected challenges

27. ASC proposes to have a more active role in the evaluation and sanctions triggered by human rights unannounced assessments and humane slaughter conformance.

To what extent do you agree with this proposal?

Not at all      Mostly disagree      Neutral      Mostly agree      Completely agree

28. Would transparency of reports mitigate potential risk to impartiality?

Yes

No

29. Please explain your responses and describe any expected challenges

30. As part of using a data-informed risk tool to select companies for unannounced assessments, ASC would ask certificate holders to share the results of any third-party labour audits that they have in place with ASC. Third-party audits with positive results could reduce the company's risk rating.

How feasible would it be to share these results with ASC?

Not at all feasible      Mostly unfeasible      Neutral      Mostly feasible      Totally feasible

31. Please explain your responses and describe any expected challenges

## Human rights: auditor role

32. ASC proposes that CoC auditors' role would be to:

- conduct document-based verification of certificate holders' commitment to the Human Rights Code of Conduct and their published human rights policy
- check that workers are aware of the policy
- collect basic data on worker demographics and human rights.

How feasible would this addition be to the auditor's responsibility?

Not at all feasible      Mostly unfeasible      Neutral      Mostly feasible      Totally feasible

33. Please explain your response and describe any expected challenges

34. What role should CoC CABs play in the verification of the Human Rights Code of Conduct? Please select all that apply:

- assess a certificate holder's implementation as part of a routine CoC audit
- send an auditor to assess a certificate holder's implementation when requested by ASC
- issue NCs or suspension if human rights issues are detected, or if requested to do so by ASC
- have no role in verification of certificate holders' implementation of the Code of Conduct

35. Please explain your response

## Human rights: other topics

36. ASC proposes that the Code of Conduct would include meaningful community engagement, a community-accessible grievance mechanism and prevention or mitigation of negative impacts on surrounding communities.

To what extent do you agree with this proposal?

Not at all	Mostly disagree	Neutral	Mostly agree	Completely agree
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

37. Please explain your response and describe any expected challenges

38. What kind of support should ASC offer certificate holders to help them meet the Human Rights Code of Conduct?

39. How could entities such as unions or civil society organisations play a role in supporting ASC proposals for responsible human rights practices?

## Humane slaughter

40. ASC proposes that qualified ASC farm auditors evaluate compliance with humane slaughter requirements (when applicable in the supply chain) and produce a letter of compliance to be verified by CoC auditors.

To what extent do you agree with this proposal?

Not at all

Mostly disagree

Neutral

Mostly agree

Completely agree

41. Please explain your response and describe any expected challenges

42. Do you foresee species or regions where the proposed humane slaughter requirements (Supply Chain Module v1.0 Annex 3) would not be feasible to be implemented?

43. Do you have another suggestion for verification of humane slaughter practices when applicable in the supply chain?

44. Should ASC farm CAB audit reports of humane slaughter practices, and/or ASC assessments of humane slaughter practices, be made public?

Yes

No

45. Please explain your response

## Food safety

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

1. Move the requirement from eligibility to a regular clause in the standard
2. Remove the requirement for companies to notify the CAB within 2 days if their food safety certification becomes invalid,
3. Include recognition of acceptably equivalent food safety programmes, as determined by ASC, such as Japan Food Safety Management - B,
4. Increase the exemption threshold by value from €2mil to €10mil.

To what extent do you agree with this proposal?

Not at all

Mostly disagree

Neutral

Mostly agree

Completely agree

47. What other food safety programmes should ASC evaluate for food safety equivalence?

## Traceability and conformance

48. How feasible is the proposed requirement for CoC CABs to record geographic coordinates of certified sites at audits?

Not at all feasible

Mostly unfeasible

Neutral

Mostly feasible

Totally feasible

49. Please explain your response and describe any expected challenges

50. Should a provision be included to allow certificate holders a period of, for example, 30 days to sell already-packed certified products following certificate cancellation, suspension or withdrawal?

Yes

No

51. Please explain your response

## General questions

52. To what extent do you find the draft Supply Chain Module document clear and readable?

Not at all clear

Mostly unclear

Neutral

Mostly clear

Very clear

53. Please explain your response

54. Do you have any general comments on the Supply Chain Module document or any other comments to share?

For more information on data protection at ASC, please refer to our [Privacy Policy](#).