ASC Chain of Custody Module Review

2nd consultation: 2 March – 17 May 2026

Summary Report

Contact: assurance@asc-aqua.org

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ASC Chain of Custody (CoC) Module Review

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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 sought stakeholder input on the feasibility and effectiveness of proposals on:

1. Human rights
2. Humane slaughter
3. Amendments to food safety
4. 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 75 days (Mar – May 2026)**
- **Feasibility testing, impact analysis (Apr – Sep 2026)**
- **Prepare final draft and resources for approval (Oct – Jan 2026)**
- **Revised 'ASC Supply Chain Module' launch (Mar 2027, effective Nov 2027)**

Overview of feedback:

Supply Chain Module document The document is clear and sets a positive direction that meets industry expectations. Additional guidance and flexibility would be welcome, particularly for smaller operators.

Human rights The policy and code of conduct proposals were largely supported, as were risk-based unannounced audits performed by competent independent third-parties. Existing social audit programmes should be recognised. Transparency and engagement with worker organisations and communities will be important.

Humane slaughter Most feedback agreed with the proposed approach, with some suggested considerations.

Food safety The current requirement can be maintained with specific amendments.

Traceability and conformance There was agreement on the feasibility of collecting geographic coordinates at audits and overall support for a sell-off period after certificate cancellation, with defined conditions.

Overview of ASC response:

Supply Chain Module document Refine final version. Develop guidance, templates and training, where possible

Human rights Progress the main elements of proposals that were supported in the consultation. Consider reduced burden for companies with third-party social audits

Humane slaughter Progress the inclusion of humane slaughter requirements. Consider simplifying the proposal for verification to be done by a CoC auditor with training

Food safety Progress amendments to the food safety requirement, including ‘acceptable equivalence’ of relevant food safety programmes on a request basis, where ASC resources allow

Traceability and conformance Progress proposed amendments. Continue to liaise with MSC to align with developments in the CoC Review

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Stakeholder trends in feedback

Larger companies with more resources are better prepared to comply with proposals on topics such as human rights, animal welfare and food safety compared to smaller or less developed companies

Companies selling to international markets are more likely to have existing certifications in place such as social audit programmes and GFSI-recognised food safety schemes, as these may be already demanded by buyers in import markets

Companies towards the end of the supply chain such as retailers tend to support a high bar for human rights, animal welfare and traceability, compared to early and mid-chain companies which are more likely to bear audit burden and costs

CABs with ASC farm auditors are less impacted by the humane slaughter proposal than CABs with CoC auditors only

Suggestion to recognise regional food safety standards such as in the UK and Sweden

Participation

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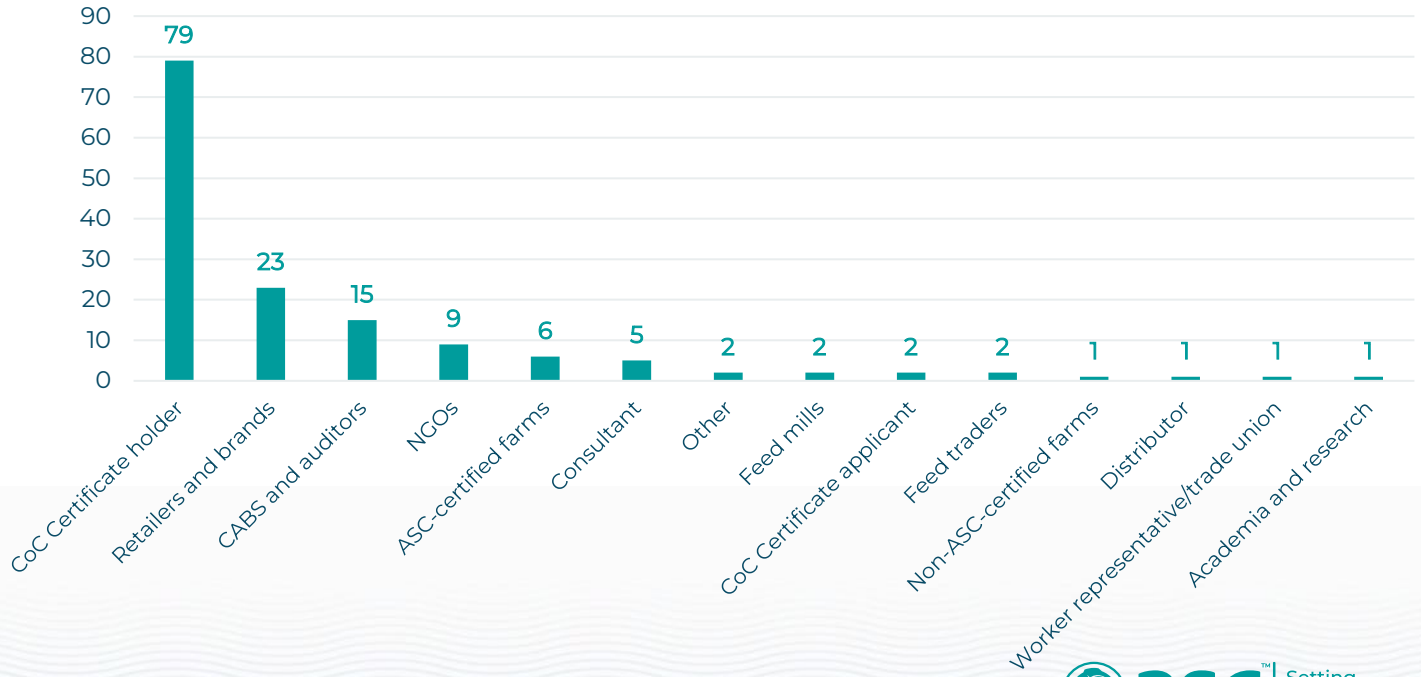
We received 149 responses to the consultation

Responses were received from a range of stakeholder types



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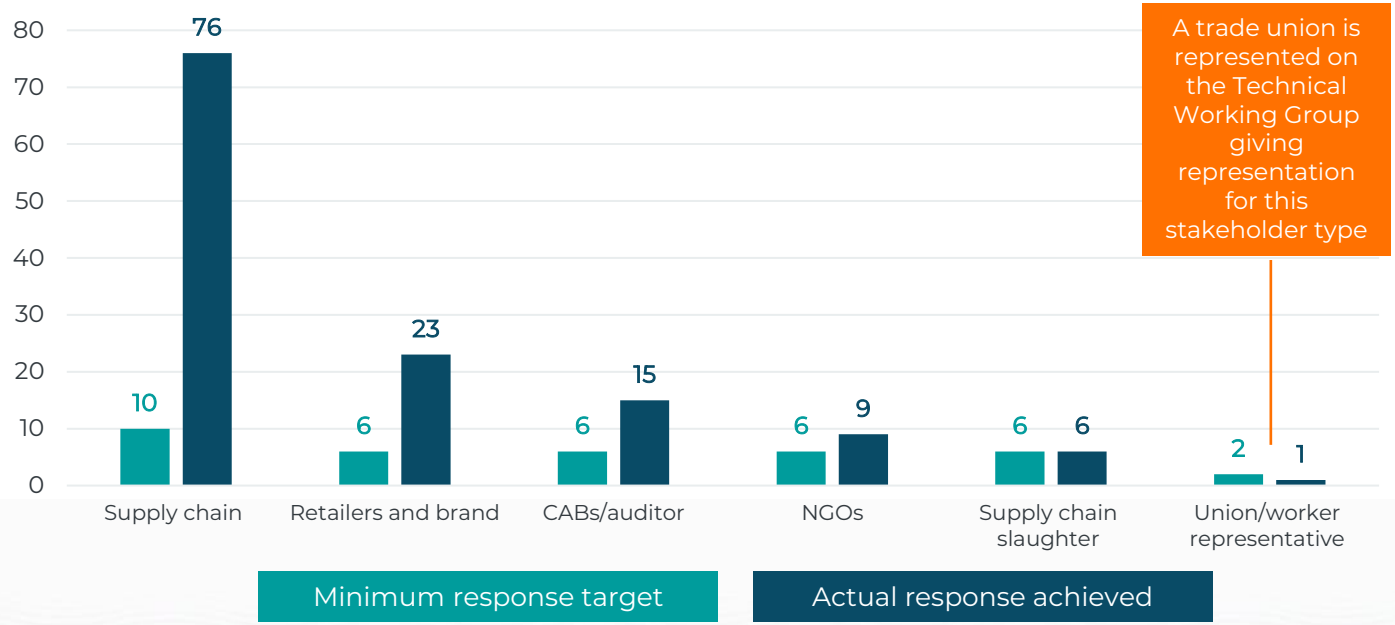
Progress against minimum engagement targets

We reached or exceeded all minimum targets except for union and worker representatives



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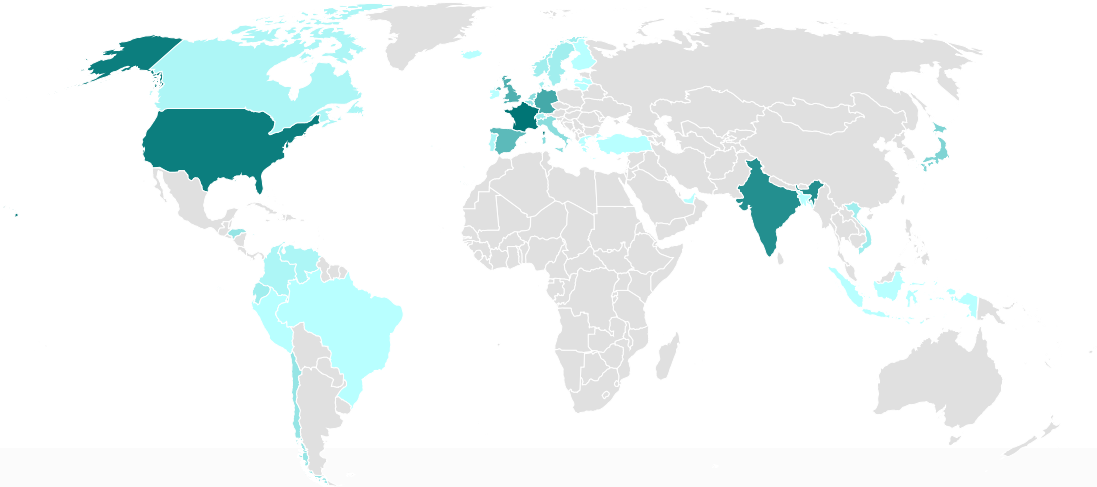
Participation across countries

We achieved strong global representation across regions



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Top participating countries

1. France
17 responses

2. United States
16 responses

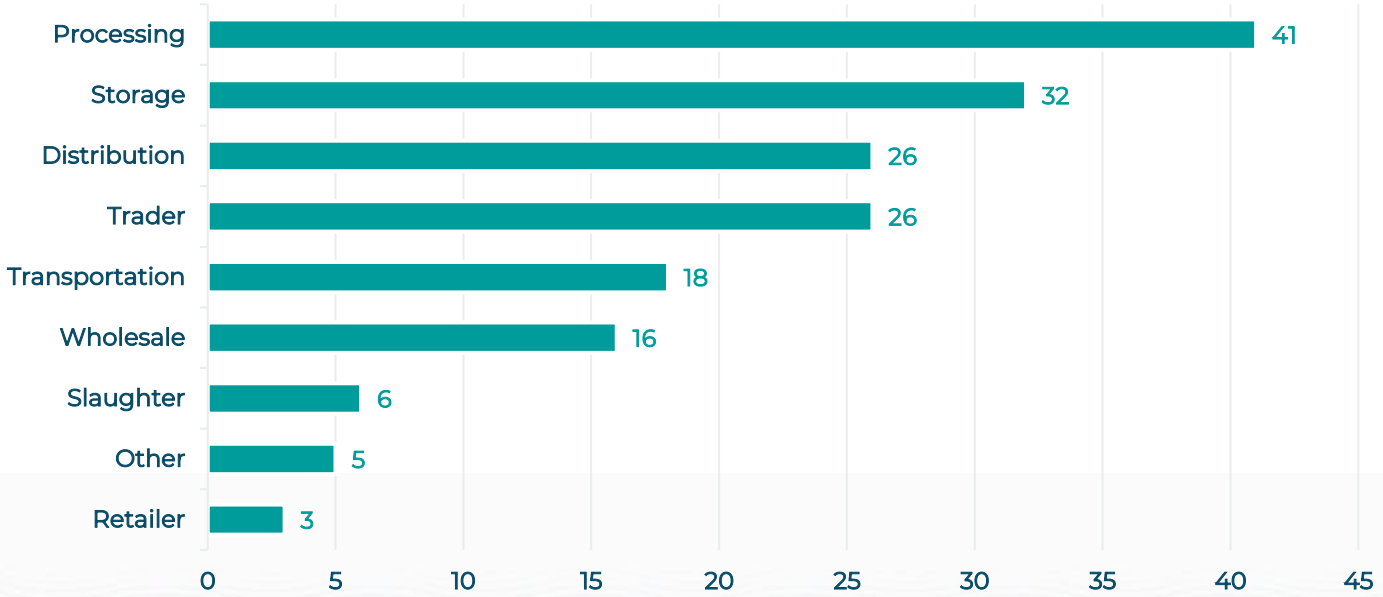
3. India
14 responses

4. Germany
11 responses

5. United Kingdom
10 responses

Participation by supply chain activity

Stakeholders can perform more than one supply chain activity



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Supply Chain Module document

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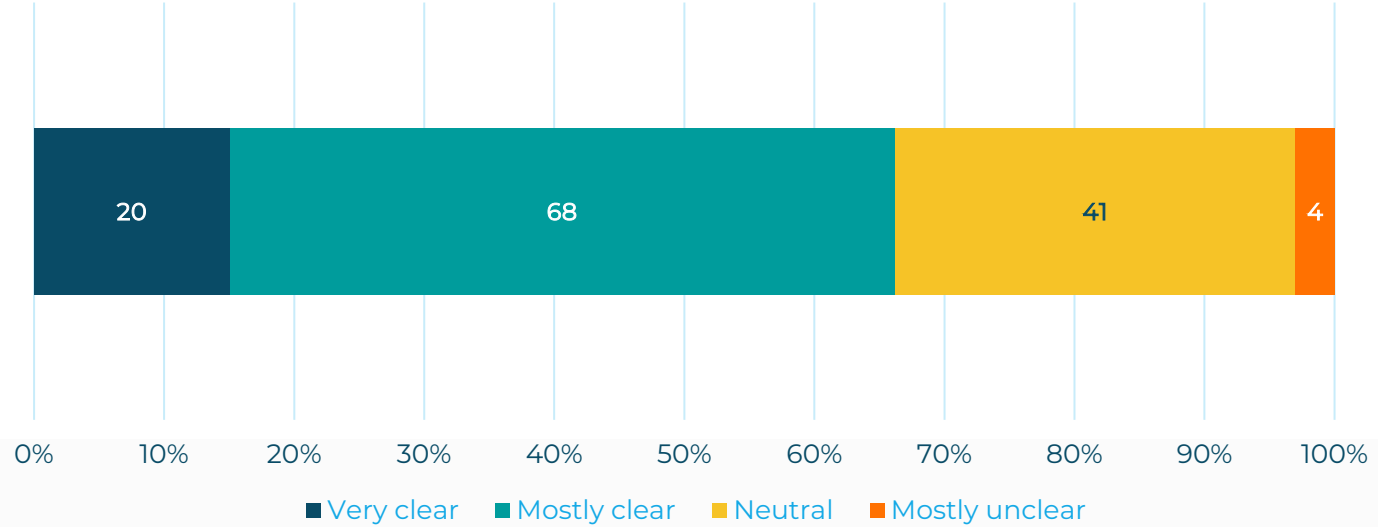
Supply Chain Module document

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



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Supply Chain Module document

Positive feedback	Areas for improvement	Other
○ A large majority of respondents found the document to be clear ○ Good acceptance of the Module as readable and well structured ○ Overall direction is positive and aligned with industry expectations	○ Offer examples, guidance and templates for consistent interpretation and implementation ○ Consider more support or flexibility for small operators ○ Provide definitions such as for young worker, traceability code ○ Clarify if annexes are mandatory ○ Roles and responsibilities between farm, CoC and third-party verification could be clearer to avoid confusion	○ There was support for more recognition of other existing schemes for food safety and social audits ○ There was a suggestion to review each requirement to ensure each can be implemented and audited effectively ○ There was a suggestion to list the Data Submission Procedure as a normative document

Human rights

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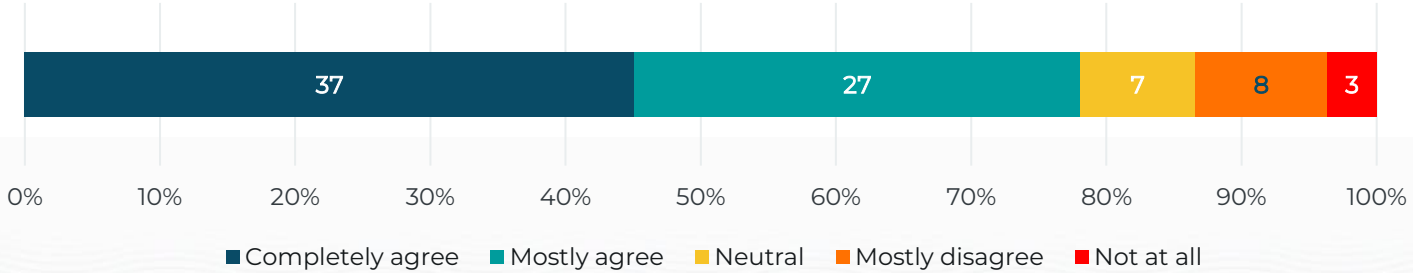
Human rights: policy and code of conduct

Agreement level: certificate holders to publish a human rights policy demonstrating commitment to respecting human rights, to be shared with all workers

Agreement level: certificate holders to commit to a human rights code of conduct, verified using a risk-based approach



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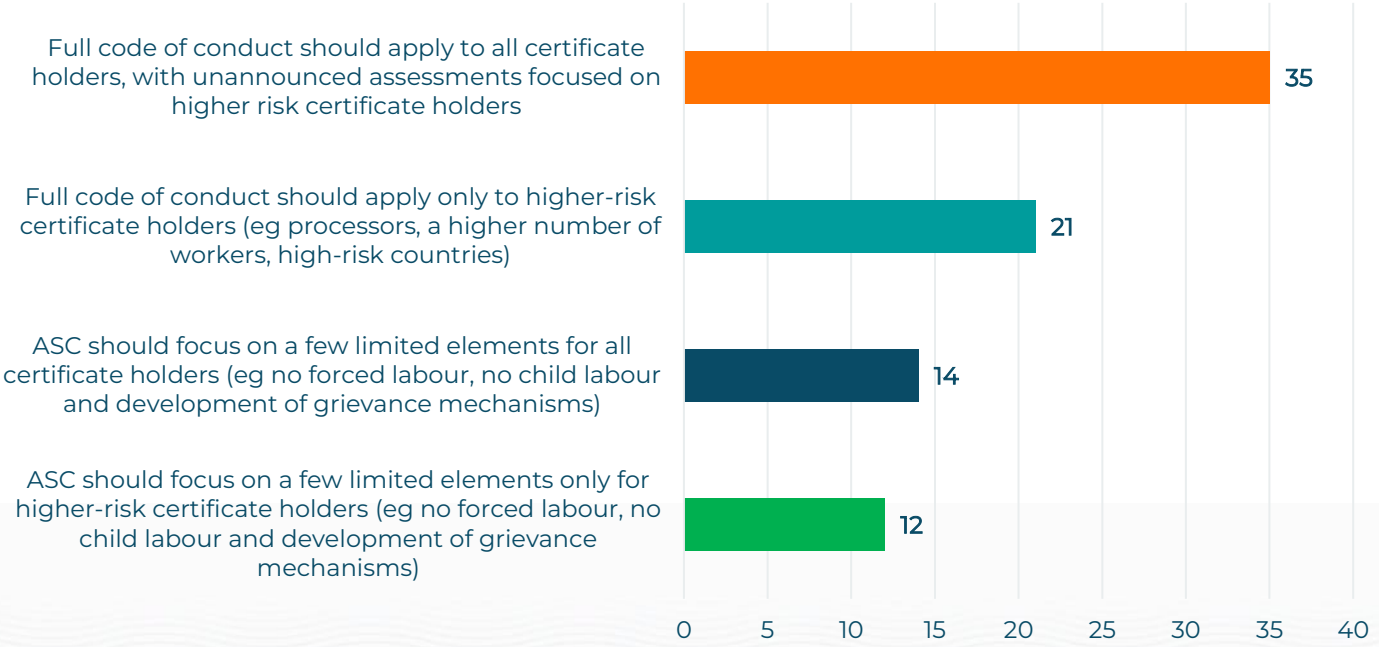
Human rights: policy and code of conduct

Code of conduct: most effective proposal



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Human rights: policy and code of conduct

Positive feedback

- Majority support for the proposal for companies to publish a human rights policy and ensure it is disseminated to workers
- Majority support for the proposal for companies to commit to a human rights code of conduct, verified by a risk-based approach
- Most support for the option for a full code of conduct applicable to all certificate holders, with unannounced assessments at higher risk certificate holders
- Helpful to ensure company commitments and that workers understand their rights

Areas for improvement

- Many submitters preferred a full code of conduct applying only to higher risk certificate holders, or one that focused on a few elements only
- A policy could be required only for higher risk countries
- Such policies are generally feasible, however there may be capacity limitations for smaller companies or sites. A template or guidance could help
- Ensuring and verifying worker awareness may be challenging due to language and literacy levels
- Helpful to clarify audit expectations

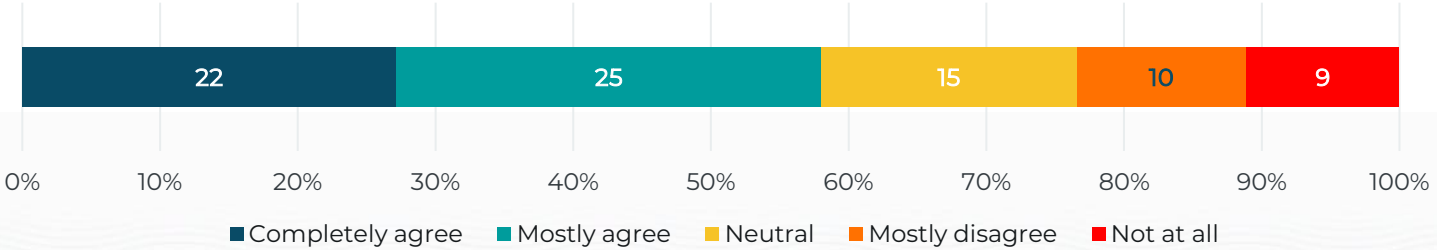
Other

- Some called for third-party social audits to be recognised to avoid duplication
- Some acknowledged the importance of verifying that policies are implemented
- Consider clear references to international labour standards
- Consider how proposals will apply to subcontractors, multi-site and group entities
- ASC should build resources and partnerships to help companies implement the code of conduct

Human rights: risk-based unannounced assessments

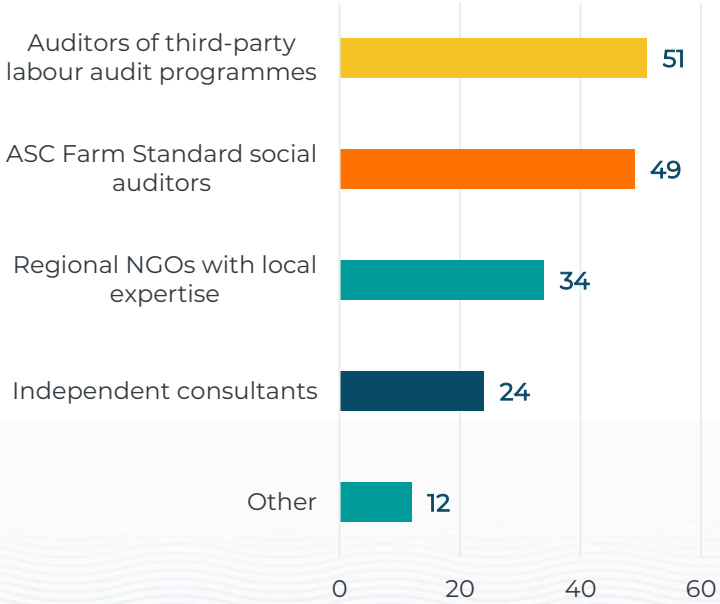
Agreement level: companies to be selected for unannounced human rights assessments by ASC's data-informed risk tool, considering factors such as activities, location, size, history, migrant workers, third-party labour audits, and worker voice inputs

Agreement level: qualified third-party agents to conduct unannounced human rights assessments to verify all or part of the code of conduct. The agent could be an NGO, an ASC-qualified auditor or a consultant

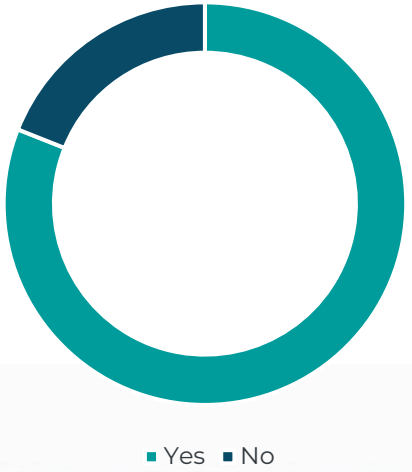


Human rights: risk-based unannounced assessments

Which qualified agents should conduct unannounced human rights assessments?



If a CoC certificate is suspended based on evidence of human rights issues, should it be possible for the CAB or the certificate holder to appeal the decision?



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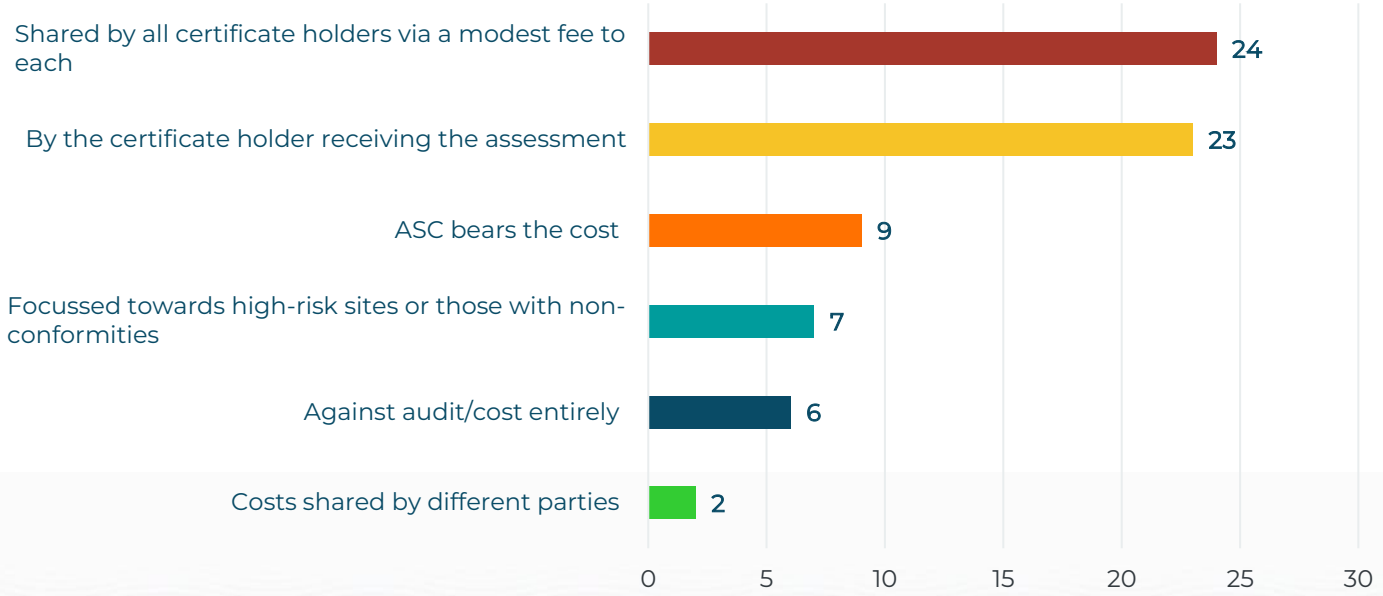
Human rights: risk-based unannounced assessments

How should costs of unannounced human rights assessments be covered?



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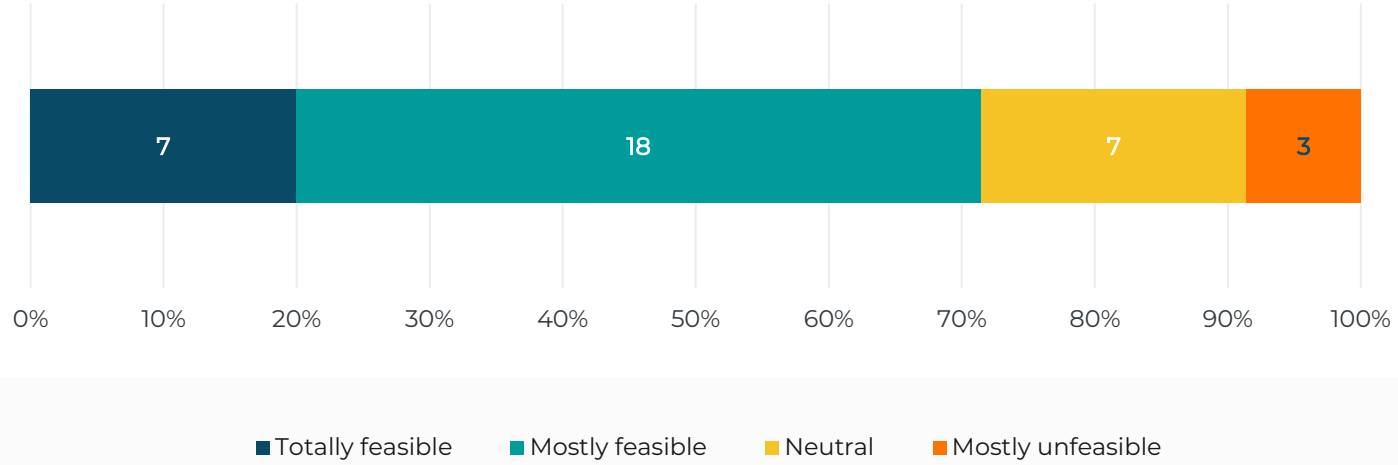
Human rights: risk-based unannounced assessments

Agreement level: certificate holder to share results of any third-party labour audits that they have in place with ASC, to be factored into the data-informed risk tool (positive results to reduce risk rating)



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Human rights: risk-based unannounced assessments

Positive feedback

- Many agreed that unannounced assessments are effective and supported the risk-based approach
- There was broad agreement with the proposed risk factors, with additional factors suggested
- Third-party labour audit programme auditors and ASC farm social auditors were most supported as qualified third-party assessors
- Some supported a diverse pool of qualified agents

Areas for improvement

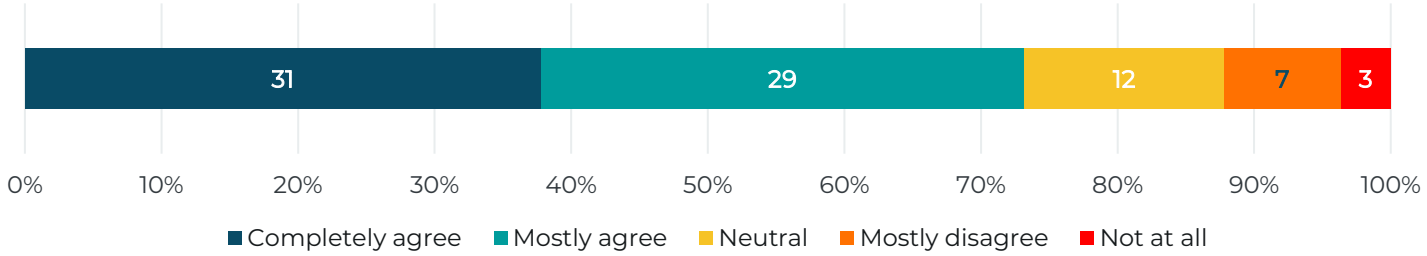
- If various parties are used as agents (farm auditors, local NGOs), there needs to be consistent qualifications and approach
- Potential bias or conflicts of interest between certificate holders and agents assessing human rights should be avoided
- Some felt that costs of unannounced assessments should depend on performance, with worse performers or higher risk entities bearing more of the cost
- Additional risk factors suggested include worker turnover, use of subcontractors, supply chain complexity, history of disputes or accidents and more

Other

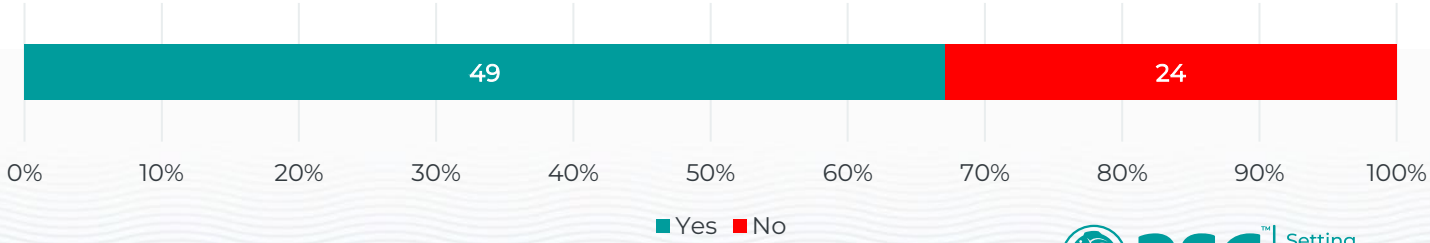
- Competence, independence and consistency of agents is key
- Views were split on who should bear costs, between all, only those receiving assessments and ASC
- Unannounced assessments were perceived to be duplicative of third-party labour audits

Human rights: transparency

Agreement level: transparency is an important part of the human rights approach, including the publication of human rights policies and outcomes of unannounced human rights assessments



Would transparency of reports mitigate potential risk related to impartiality?



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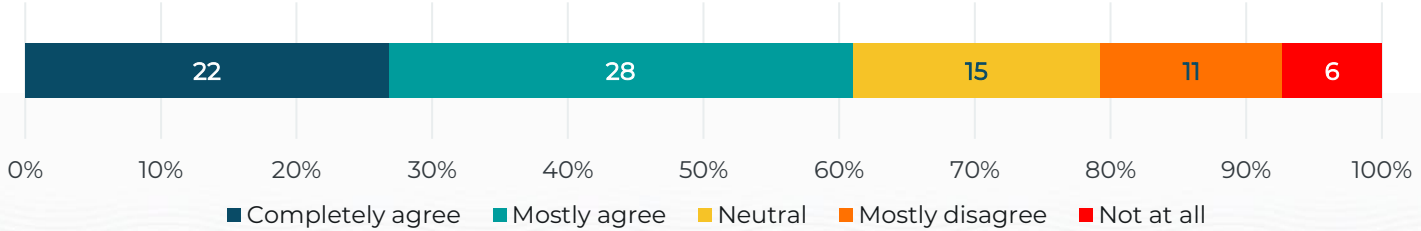
Human rights: roles

Agreement level: CoC auditors' role to conduct document-based verification of commitment to the code of conduct and published human rights policies, check workers are aware of the policy and collect basic data on worker demographics and human rights

Agreement level: ASC to have a more active role in the evaluation and sanctions triggered by human rights unannounced assessments and humane slaughter conformance



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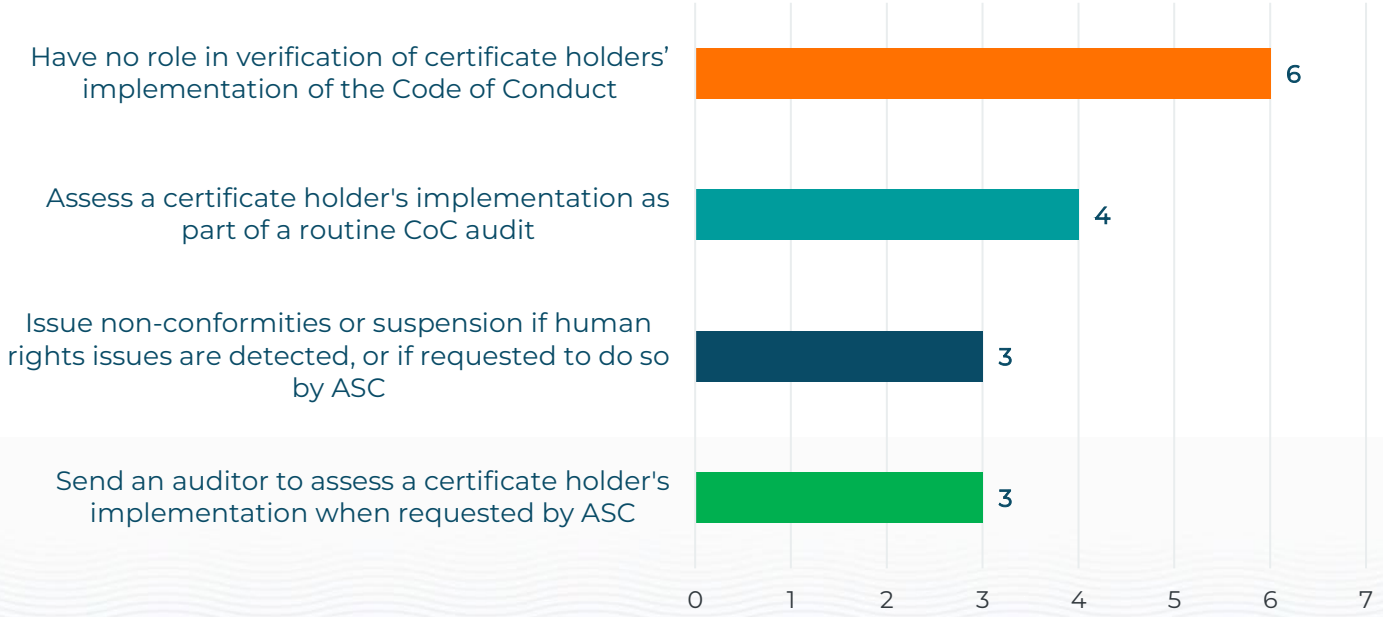
Human rights: CoC CAB role

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



Human rights: transparency, ASC and CAB roles

Positive feedback

- Most respondents agreed that transparency is important to maintain trust and collaboration, including publication of policies and outcomes of unannounced assessments
- Majority agreed that transparency of reports mitigates potential risks related to impartiality
- Most agreed or were neutral about proposed ASC and CAB/ auditor roles

Areas for improvement

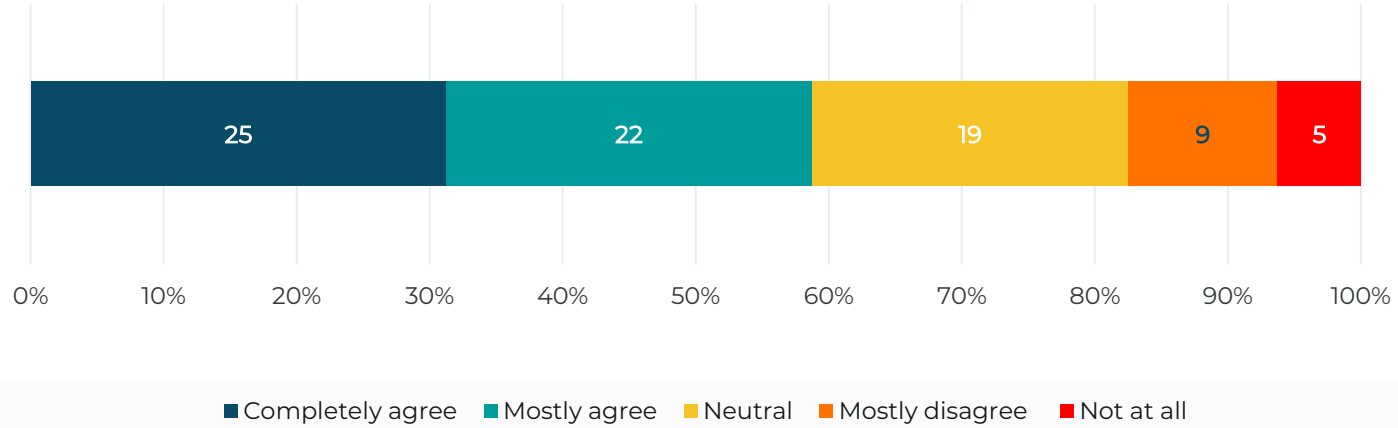
- Publication of assessment outcomes should be done responsibly and sensitively
- Suggestion to limit detail, e.g. publish scores but not specific non-conformities
- Suggestion to notify buyers to help encourage improvement
- ASC's more active role in human rights assurance is appropriate as scheme owner but must be based on consistent criteria, transparent processes and strong governance

Other

- Publication of assessment outcomes could have undesired impacts such as retaliation, hiding issues and deterring companies from participating
- Impacts to companies could extend to non-ASC business
- Risk of misinterpretation of findings without proper context
- Transparency could help workers decide where to apply
- A response noted that attitudes to, and compliance with, transparency can vary by country

Human rights: community engagement

Agreement level: ASC human rights code of conduct to include meaningful community engagement, a community-accessible grievance mechanism and prevention or mitigation of negative impacts on surrounding communities.



Human rights: community engagement

Positive feedback

- Community engagement and grievance mechanisms are important elements of responsible practices
- Including these elements in the code of conduct can help ensure aquaculture operations respect community rights and address potential impacts

Areas for improvement

- Requirements should remain practical and aligned with the scope of supply chain companies
- Clearer definitions needed such as for ‘meaningful engagement’ and ‘avoiding negative impacts’
- Some consider it not relevant for supply chain, some locations do not have interactions with local communities or are low risk
- Avoid duplication with other social standards
- Grievance mechanisms must be accessible, confidential, and free from retaliation

Other

- There could be challenges in implementing accessible grievance mechanisms in diverse contexts, balancing community concerns with business needs and measuring and verifying effectiveness
- Recommend ASC partner with local organisations and human rights groups to ensure meaningful engagement
- Some things are beyond the influence of the certificate holder

Human rights: other topics

What support should ASC offer?

- Briefings, training, guidance, case studies and practical examples for various contexts
- Templates and tools for risk assessments, grievance mechanisms etc
- Support for capacity building, especially for smaller operations
- Access to expert resources on human rights and labour standards, including regional NGOs and unions
- Form partnerships with local organizations, worker representatives, civil society organizations and consultants who can support companies directly
- Outreach, meetings, visits
- Grievance channels
- Networking opportunities with other certificate holders for sharing best practices

Human rights: other topics

How could unions or civil society organisations play a role?

- Create awareness of workers' rights
- Promote participation and implementation, strengthen networks and links between companies and communities
- Provide worker voice inputs and feedback to ASC
- Advise ASC on local issues and code of conduct guidance and implementation
- Help ASC identify potential human rights risks at companies, e.g. via surveys
- Support workers to access grievance mechanisms and support safe resolution of issues
- Collaborate on training or awareness programs
- Advocate for transparency and accountability
- Help communicate requirements and updates
- Guidance, support and input at audits

Human rights: ASC response and next steps

In response to consultation feedback, ASC will:

- Progress the main elements of proposals that were supported in the consultation
- Consider a reduced burden for companies with recognised third-party social audits
- Define assessor qualifications, methodology, checklist and build assessor pool
- Create a simple first data-informed risk tool for identification of higher risk companies
- Draft ASC unannounced assessments process including risk-based selection, handling of findings and remediation
- Develop supporting resources where possible such as templates, guidance, examples and training
- Work towards building local network of partners including to support remediation
- Create a cost recovery mechanism
- Conduct three mock assessments of the code of conduct and related process
- Clarify the coverage and application to subcontractors and multi-sites
- Improve and refine final human rights elements

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Humane slaughter
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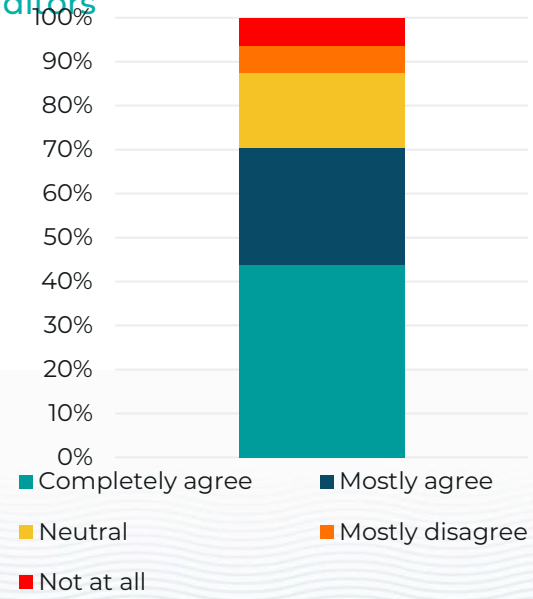
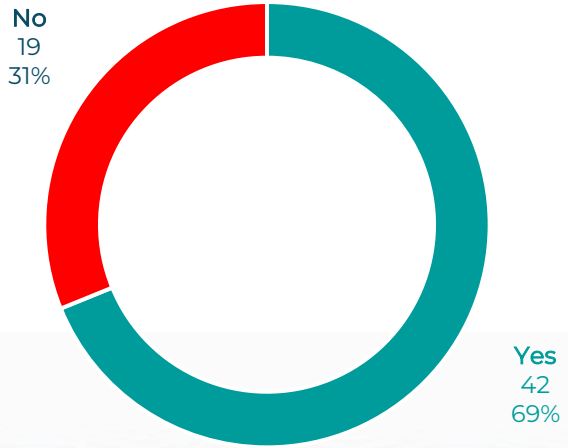
Humane slaughter: results

Agreement level: ASC farm auditors to evaluate conformance with humane slaughter requirements and produce a letter to be verified by CoC auditors



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



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Humane slaughter: comments

Positive feedback

- Majority agreed that ASC farm auditors could evaluate conformance with humane slaughter requirements and produce a letter to be verified by CoC auditors
- Most agreed with the proposed approach to humane slaughter and that CAB or ASC reports on humane slaughter practices should be made public
- Humane slaughter is important regardless of where it occurs

Areas for improvement

- Some disagreed with ASC farm auditors evaluating conformance with humane slaughter requirements
- Some also disagreed that CAB or ASC reports on slaughter practices should be made public
- Some expressed concern about additional audits due to requiring an ASC farm auditor to visit a CoC facility
- Difficulties in aligning audit timing with slaughter activity
- More specifics needed on the process of verifying slaughter and ASC oversight

Other

- Specific slaughter audit expertise is needed. Farm auditors were seen as appropriate for auditing as well as CoC auditors with training
- There was feedback on ASC Farm Standard indicators and how some may not have access to humane slaughter methods
- Possible impacts on CABs who offer CoC but not farm certification
- Other suggestions were use of on-site camera footage, recognition of other welfare standards and risk-based verification

Humane slaughter: ASC response and next steps

In response to consultation feedback, ASC will:

- Progress with the inclusion of humane slaughter requirements, as supported in consultation
- Consider amending the proposal for humane slaughter verification to be done by a CoC auditor with training, rather than by a farm auditor, for a smoother, less complex process
- Develop relevant CoC auditor training, if that option is pursued
- Test the use of farm and CoC auditors in mock audits in various species and locations
- Provide more specifics on auditor verification and ASC oversight
- Convey feedback on humane slaughter auditability to Farm Standard review
- Improve and refine final Module humane slaughter elements, potentially removing Annex 2

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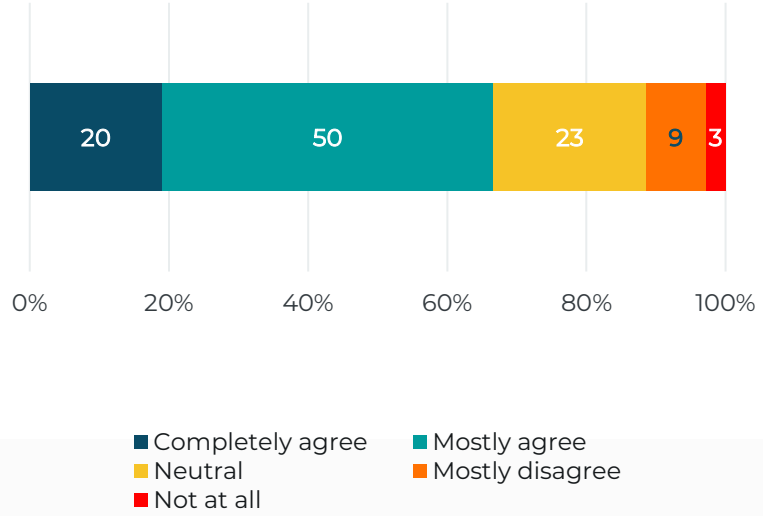
Food safety: results

Agreement level: ASC 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 two 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 €2 mil to €10 mil.

Food safety: comments

Positive feedback

- Majority of respondents agreed with maintaining the food safety requirement with the proposed amendments
- Respondents welcomed flexibility and inclusivity of potential recognition of additional food safety programmes

Areas for improvement

- Some respondents disagreed with the proposed amendments
- A few respondents considered that CABs should still be informed if a company's food safety certificate becomes invalid
- A few comments were not supportive of increasing the exemption threshold by value
- Accepting a wider variety of food safety programmes would be more comprehensive and inclusive

Other

- Several respondents requested acceptance of food safety programmes which are GFSI-recognised and therefore are already accepted, e.g. BRC, IFS
- Several suggested ISO 22000 which is also already accepted
- Several suggested HACCP, which is not considered acceptably equivalent to GFSI-recognised or ISO 22000 certification

Food safety: ASC response and next steps

In response to consultation feedback, ASC will:

- Progress amendments to the food safety requirement as supported in consultation
- Continue to evaluate and determine ‘acceptable equivalence’ of relevant food safety programmes on a request basis, when ASC resources are available
- Create a location on the ASC website to communicate “acceptably equivalent’ food safety programmes for supply chain
- Cover food safety amendments in mock audit testing
- Continue to monitor implementation, impacts and queries regarding the food safety requirement

Traceability and conformance

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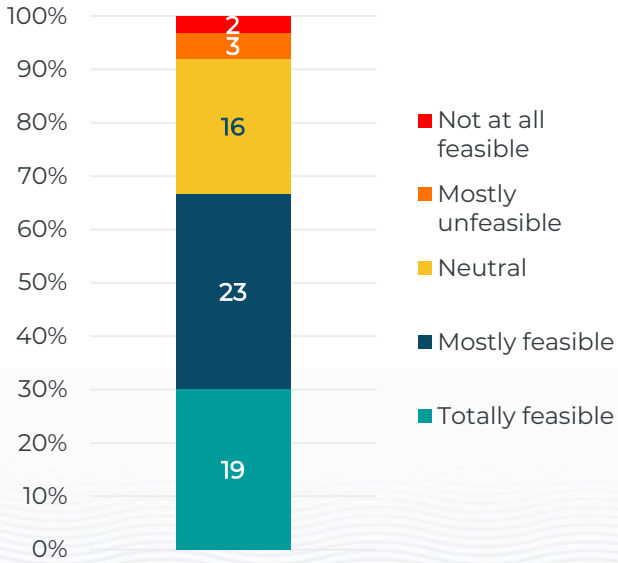
Traceability and conformance: results

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



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?

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Traceability and conformance: comments

Positive feedback

- Most responses stated it's feasible to collect geographic coordinates of sites at audits
- Many agreed that specific location is important and easy to capture
- Most respondents supported introducing a period to allow sale of already-packed product following a cancellation, suspension or withdrawal
- Support for sell-off period as commercially practical and avoiding waste of conforming products

Areas for improvement

- It was suggested that ASC recommend a software to capture location coordinates
- In relation to a possible sell-off period, limitations were recognised in relation to verifying sales after certification ends, increasing risk of confusion and fraud. Clear conditions should be defined to prevent misuse
- Sell-off period is appropriate for cancellation but not suspension or withdrawal. The underlying reason is an important factor

Other

- Possible challenges with accurate location coordinates for multi-sites and groups
- No internet in some locations to verify coordinates on-site
- Regarding the potential sell-off period, a balanced approach is key to ensuring fairness while maintaining integrity

Traceability and conformance: ASC response and next steps

In response to consultation feedback, ASC will:

- Progress amendments to traceability and conformance elements as supported in consultation
- Cover traceability and conformance amendments in mock audit testing
- Continue to liaise with MSC to align with developments in the CoC Review.
- Consider whether a sell-off period is appropriate in cases of certificate suspension or withdrawal
- Improve and refine final Module content on these topics

Thank you!

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Aquaculture Stewardship Council
Maliebaan 50-B, 3581 CS Utrecht, The Netherlands
Tel: +31 308085450

www.asc-aqua.org
communication@asc-aqua.org
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