

MARINE STEWARDSHIP COUNCIL - TECHNICAL ADVISORY BOARD

TAB DIRECTIVE SERIES

| TAB Directive Number | Title | Issue Date |
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| TAB D-026 v2 | Issue of Chain of Custody Certification Methodology v7 | 23 February 2010 |
| Decision date: 4 December 2010 Effective date for all clients and certification bodies: 01 July 2010. See implementation requirements, Directions 2 to 4. | | |

Documents Supplemented or Modified by this Directive

| MSC Scheme Document | Status Change |
|----------------------------|----------------------|
| TAB Dir 026 v1 | Superseded by v2 |
| CoCCM v6.1 | Superseded by v7 |

Background

There are currently no documented requirements regarding how to audit companies not handling MSC-certified products at the time of the on-site audit or when they handle fish originating from fisheries still under full MSC assessment. In order to correct this, the main body of the Chain of Custody Certification Methodology version 6.1 has been revised to include specific requirements to deal with these situations.

There is currently no documented requirement for certifiers to use the MSC database. All certifiers have been trained on the system and are now using it. As the MSC database acts as the centralised source of information on the CoC program, its use has been formally required.

The revised methodology includes requirements that were not previously documented and minor errors identified in appendices B and C of the CoCCM v6.1 were corrected. Consequently, the MSC aims at improving the performance of certification bodies and increase their consistency when carrying out CoC certification audits.

Intent

The intent of this directive is:

- a) to ensure that the integrity of the MSC chain of custody is preserved;
- b) to allow CoC certificates to be issued for companies not handling MSC-certified products at the time of the audit;
- c) to allow the inclusion of under-MSC-assessment in the scope of the audit; and
- d) to improve clarity of the MSC CoC requirements to ensure consistent assessments globally.

Direction

1. The Chain of Custody Certification Methodology version 7 is effective from 1st July 2010.
2. CBs shall implement the new version as follows:
 - a) CBs shall update their systems to incorporate the changes described in CoCCM v7 by 1st July 2010;
 - b) CBs shall audit their clients (certification, surveillance and non-regular audits) against CoCCM v7 from 1st July 2010;

- c) CBs shall have updated all their clients' certificates by 1st July 2011 to conform with the requirements of the CoCCM v7.
- 3. If CBs wish to implement CoCCM v7 before 1st July 2010, they are allowed to do so, but they must implement the whole methodology and associated TAB Directive 21 v2 and Policy Advisory 4 v4.
- 4. For clients already handling under-MSA-assessment fish and audited under the requirements of TAB Directive 021 or Policy Advisory 4, CBs shall issue a valid CoC certificate and an under-MSA-assessment schedule as per 5.6 of CoCCM v7 on or before 1st August 2010. If the client has already received a full certificate, CBs shall issue an under-MSA-assessment schedule as per 5.6 of CoCCM v7 on or before 1st August 2010.
- 5. Changes to the methodology are recorded in Appendix 1 to this Directive.

ENDS

Appendix 1: Document comparison – CoCCM v6.1 compared to CoCCM v7

The table below lists all requirements present in CoCCM v6.1 and indicates which have been modified to obtain CoCCM v7.

NB: The word ‘certifier’ has been changed to ‘CB’ throughout the document, the words: assessment, evaluation, visit have been changed to audit. Assessor has been replaced by auditor. The word ‘logo’ has been changed to ‘ecolabel’.

| CoCCM v6.1 (current) | CoCCM v7 | Comments |
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| Copyright notice | Copyright notice | The copyright notice has been updated |
| Contents | Contents | The table has been updated to reflect the changes made in CoCCM v7 |
| Responsibility for this Methodology | Responsibility for this Methodology | Amendment I has been added |
| Foreword | Foreword | Paragraph 5: “risk to mixing” changed to “risk of mixing”, “Appendix B” changed to “Appendices B and C”, footnote has been removed |
| MSC document overview | MSC document overview | Tier 3: Policy advisories added to the list of mandatory documents Guidance on group certification added to Guidance and advisory documents Last paragraph updated to reflect the appointment of outsourcing of accreditation function. |
| 1. Scope | 1. Scope | 2: ‘international accreditation body’ changed to ‘international standard setting body’ 4 th paragraph: MSC’s appointed accreditation body has been included to reflect the appointment of ASI. |
| 2. References | 2. References | TAB Dir 016 replaced by ‘TAB directives’ Guidance on MSC group certification requirements v1.0 has been added Reference to ISO Guide 2:1996, Standardization and related activities – General Vocabulary has been replaced by ISO / IEC 17000:2004 Conformity assessment — Vocabulary and general principles ISO 17021:2006 has been added |
| 3. Definitions | 3. Definitions | 10 new definition have been added |

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| 4.1 | 4.1 | Table 1 has been updated: 3. Group certification has been added and 3. Interim authorisation has been changed to 4. Interim Certification. Reference to 5.10 has been changed to 5.11 (last column). Accredited CoC certification: "that fall outside of the other two categories" has been changed to "that fall outside the other three categories". Accredited CoC Combined audit: MSC CoCSt has been changed to MSC Chain of Custody Standard Last paragraph: Interim certification, 2 nd sentence: Interim permission to place (...) prior to on-site assessment was replaced by "Permission for interim certification". "5.10" was replaced by "5.11". |
| 4.2 | 4.2 | Section was entirely revised. Paragraphs 2 and 3 (v6.1) have been entirely removed: |
| 5.1 | 5.1 | Overview of methodology and associated actions and/or outputs (Tier 1) |
| 5.1.1 | 5.1.1 | No change |
| 5.1.2 | 5.1.2 | b) and c) have been updated in line with requirements for the use of the MSC database |
| 5.1.3 | 5.1.3 | a) "the certificate (...) must be awarded prior (...)" has been removed as a requirement has been added for CB to assess the ability of the stock held by a client to be classified as MSC-certified (see 5.4.6 h) a), b) and c) have been updated to reflect the change from Interim authorisation to interim certification. |
| 5.1.4 | 5.1.4 | a) "and other factors" has been added in line with the revision of Appendix A b) has been updated in line with requirements for the use of the MSC database |
| 5.2 | 5.2 | Initial Client Interest and contract for certification |
| 5.2.1 | 5.2.1 | No change |
| | 5.2.2 | New - Preliminary checks to prevent suspended client from re-applying |
| 5.2.2 | 5.2.3 | Numbering change, no change to text |
| | 5.2.4 | New - request for information on potential scope |
| | 5.2.5 | New - requirements in line with those for under-MSC-assessment products |
| | 5.2.6 | New - requirements in line with those for products not on site |
| | 5.2.7 | New - requirements in line with those for products not on site |
| 5.2.3 | 5.2.8 | Numbering change, no change to text |
| 5.2.4 | 5.2.9 | "Under-MSC-assessment and" has been added and 'Proceed' has been changed to 'proceeds' |
| 5.2.5 | 5.2.10 | a) has been amended to include definition of Group c) 'interim authorisation' changed to 'interim certification' |
| 5.2.6 | 5.2.11 | Numbering change, no change to text |
| 5.2.7 | 5.2.12 | Numbering change, no change to text |

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| 5.2.8 | 5.2.13 | Numbering change, no change to text |
| 5.3 | 5.3 | Assessment planning |
| 5.3.1 | 5.3.1 | Changed to reflect the use of the MSC database and a time limit has been included for recording the client as an applicant following the receipt of the signed contract from the client. |
| 5.3.2 | 5.3.2 | No change |
| | 5.3.3 | New - require that CBs allow sufficient time to audit the company for the full scope when planning the audit |
| 5.3.3 | 5.3.4 | Numbering change, no change to text |
| 5.3.4 | 5.3.5 | Numbering change, no change to text |
| | 5.3.6 | New - requirements in line with requirement for Product Handled Schedule |
| 5.4 | 5.4 | On-site Evaluation |
| 5.4.1 | 5.4.1 | No change |
| 5.4.2 | 5.4.2 | No change |
| | 5.4.3 | New - requirement in line with requirements for product not on site |
| | 5.4.4 | New - requirement in line with requirements for product not on site |
| 5.4.3 | 5.4.5 | (...) supply of “certified fish (...) logo to the certified fish” has been changed to (...) supply of “the products listed in the potential scope”. |
| 5.4.4 | 5.4.6 | c) has been amended: “or could be” has been added, “recipients” has been changed to “the client”, “MSC-certified” and “under-MSC-assessment” have been added d) has been amended: “MSC-certified” and “under-MSC-assessment” have been added f) new : traceability exercise presented in more detail g) new : requirement for reconciliation of stock h) new : review the status of stock held i) new : requirement in line with those for under-MSC-assessment products j) new : requirement in line with the use of the MSC database |
| | 5.4.7 | New - in line with requirements for under-MSC-assessment products |

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| 5.4.5 | 5.4.8 | Has been updated for clarity: “ CB lead assessor shall ensure that “ changed to “CB lead assessor shall” and a) Numbering change i. Has been amended to include the requirements for the use of the MSC database ii. Numbering change, changed for clarity iii. Numbering change, no change to text. iv. New - requirement in line with those for under-MSA-assessment products v. New - requirement in line with those for under-MSA-assessment products vi. New - requirement in line with those for product not on site vii. New – requirement in line the use of the MSC database b) New - requirement in line with those for Product Handled Schedule |
| 5.4.6 | 5.4.9 | Numbering change, no change to text. |
| 5.5 | 5.5 | Results and recommendations |
| 5.5.1 | 5.5.1 | a) No change b) No change c) iii) changed to c) and changed to include under-MSA-assessment products and “certified” has been deleted before client’s actions or inaction |
| 5.5.2 | 5.5.2 | No change |
| 5.6 | 5.6 | Certification awarded |
| 5.6.1 | 5.6.1 | Reviewed to include new requirements on certificates |
| | 5.6.2 | New - requirement in line with those on certificates |
| | 5.6.3 | New - requirement in line with those for under-MSA-assessment products |
| | 5.6.4 | New - requirement on the decision of certification |
| 5.6.2 | 5.6.5 | Changed in line with those for the use of the MSC database |
| | 5.6.6 | New - requirement in line with those for the use of the MSC database |
| | 5.6.7 | New - requirement in line with those for the use of the MSC database |
| | 5.6.8 | New - requirement in line with those for the use of the MSC database |
| 5.6.3 | 5.6.9 | “5.6.2 and 5.6.3” has been added Should has been changed to shall “Description” has been changed to “MSC database” |
| 5.6.4 | | Removed as covered by 5.6.7 |
| | 5.7 | Reclassifying products described previously as 'under-MSA-assessment' in the CoC Scope Schedule - NEW |
| | 5.7.1 | New – requirement in line with those for under MSA-assessment products |
| | 5.7.2 | New – requirement in line with those for under MSA-assessment products |

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| 5.7 | 5.8 | Extension of scope of certification – Numbering change |
| 5.7.1 | 5.8.1 | Numbering change, no change to text. |
| 5.7.2 | 5.8.2 | Numbering change, no change to text |
| 5.7.3 | 5.8.3 | Numbering change, no change to text |
| 5.7.4 | 5.8.4 | Numbering change, no change to text |
| | 5.8.5 | New - requirement in line with those for the use of the MSC database |
| 5.7.5 | 5.8.6 | Updated in line with requirements for the use of the MSC database |
| 5.8 | 5.9 | Surveillance audit |
| 5.8.1 | 5.9.1 | Numbering change, no change to text. |
| 5.8.2 | 5.9.2 | Numbering change. The second sentence was changed to improve clarity: “audit” was added after “surveillance” |
| 5.8.3 | 5.9.3 | Changed to reflect changes to Appendix A. Details on surveillance frequency removed – now found in Appendix A. |
| 5.8.4 | 5.9.4 | Numbering change, no change to text |
| 5.8.5 | 5.9.5 | Numbering change, no change to text |
| | 5.9.6 | New - requirement in line with requirements for Product Handled Schedule |
| | 5.9.7 | New - requirement in line with requirements for Product Handled Schedule |
| | 5.9.8 | New - it is now requested that CBs publish a report after each surveillance audit |
| 5.8.6 | 5.9.9 | Changed in line with requirements for the use of the MSC database. It is now required that CBs upload each surveillance audit report on the MSC database |
| 5.9 | 5.10 | Reassessment |
| 5.9.1 | 5.10.1 | Numbering change, no change to text |
| | 5.10.2 | New - requirement in line with those for Product Handled Schedule |
| 5.10 | 5.11 | Interim Authorisation changed to Interim certification |
| 5.10.1 | 5.11.1 | Numbering change, no change to text |
| | 5.11.2 | New presentation of clause: was part of 5.10.1 in v6.1. Interim authorisation has been replaced by interim certification |
| | 5.11.3 | New presentation of clause: was a footnote in v6.1 |
| 5.10.2 | 5.11.4 | Interim authorisation changed to interim certification and other changes made in line with requirements for the use of the MSC database |
| | 5.11.5 | New heading: was previously part of 5.10.2. “Permission for” has been added and “authorisation” has been changed to “certification” |
| 5.10.3 | 5.11.6 | Interim authorisation changed to interim certification |
| Appendix A | Appendix A | Entirely revised |

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| Appendix F | Appendix F | Entirely revised |
| Appendix B | Appendix B | Requirements for Certification Bodies providing certification of group schemes |
| 6.2 | 6.2 | Table 1 row 6 has been amended to read a) Under 3 (was above 6) c) Above 6 (was under 3) |
| 8.3 | 8.3 | Table 5 has been amended Row 31-60 has been amended to 51-60 |
| 9.1.3 | 9.1.3 | “and scope” has been added |
| 9.3 | 9.3.1 | Numbering change. Requirement amended in line with those on defining scope of group and the use of the MSC database. “The CB shall enter (...) and the attached schedules” was added |
| 9.3 | 9.3.2 | Numbering change. “The scope of the certificate (...) recorded on the MSC database” was added |
| 10.1 | 10.1 | Amended: when a site brings a new activity to the group, CB shall approve the addition of the site to the group |
| 10.2 | 10.2 | “and if the sites do not add new activities (...) certificate” has been added in line with requirements for adding sites to a group |
| 10.4 | 10.4 | Revised in line with requirements for the use of the MSC database |
| Annex 1 Table A Table B Table C | Annex 1 Table A Table B Table C | All: 82 to 100 was changed to 85 to 100 400 to 441 was changed to 401 to 441 |
| Annex 2 | Annex 2 | In the definitions of ‘distribution’, ‘wholesale’, ‘harvest’ and ‘packing or repacking’, “should” has been replaced by “shall”. |
| Appendix C | Appendix C | Requirements for groups wishing to become certified to MSC’s Chain of Custody standard |
| 4.4.4 | 4.4.4 | Amended to ensure the scope of each site is added to the register of site |
| 5.4.1 | 5.4.1 | “all staff” was replaced by “staff” |
| 8.2.1 | 8.2.1 | Amended to reflect that the addition of sites that does not bring any new activity do not need to be approved by the CB |
| 8.2.2 | 8.2.2 | Amended to reflect that the addition of sites that brings new activity needs to be approved by the CB |
| Appendix D | Appendix D | Chain of custody certification report |
| Description of supplier’s system for controlling CoC | Description of client’s system for controlling CoC | “Supplier” was replaced by “client” in the column Section for consistency reasons with the rest of the document. “to be” was replaced by “how they are” for clarity |
| Monitoring | Monitoring | “adequacy of supplier’s CoC system” was replaced by “adequacy of client’s CoC system” for consistency reason with the rest of the document |

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| Appendix E | Appendix E | Interim authorisation to allow fish or fish product(s) enter the chain of custody and / or to use the MSC trademark - risk assessment criteria changed to Interim certification |
| Appendix J | Appendix J | Chain of Custody Complaints Procedure |
| | | Second, forth and fifth paragraphs updated to reflect the outsourcing of the accreditation function In the fifth paragraph, Chief executive has been replaced by Managing Director. In the last paragraph, Logo Licensing Manager has been removed. The email address changed to ecolabel@msc.org |
| Appendix K | Appendix K | Extended definition of scope |
| | | New. CBs had previously received the information by email – now formalised in the CoCCM. |