

ASC Chain of Custody Module v1.1

Frequently Asked Questions (FAQs)

May 2023

1. What is the effective date of the ASC CoC Module?

The CoC Module was released on 30 May 2022, and it is effective one year later on 30 May 2023. Companies must comply with the new requirements by the time of their first audit after 30 May 2023. See Question 18 regarding a grace period for the food safety requirement.

2. Which CoC documents are affected by the proposed requirements?

The CoC Module includes additions to the MSC CoC Standard, MSC CoC Certification Requirements, MSC General Certification Requirements and MSC Vocabulary.

3. Why did ASC introduce additional CoC requirements?

The additional requirements are part of a new suite of assurance activities and tools to address emergent issues such as seafood fraud, food safety and use of substances such as antibiotics. Additional requirements are also needed partly due to inherent differences in producing farmed vs wild seafood, such as human-managed inputs and controlled environments. The new requirements aim to reflect global best practice and incorporate innovation by providing for the use of technology such as digital traceability and product authentication techniques.

4. What is the content of the ASC CoC Module?

Some of the main aspects of the module are:

- Sites that do ASC processing or packing must be certified to a Global Food Safety Initiative (GFSI) recognised scheme or ISO 22000, unless the organisation is exempt based on size
- All certificate holders must carry out a food fraud vulnerability assessment and intervention plan

- All certificate holders will be required to report specific data to ASC, aligned with the ASC Key Data Element project
- Certificate holders that buy directly from certified farms must verify CoC coverage is continuous from farm to first buyer and consider applicable product eligibility factors
- Introduction of a transparent list of ineligibility criteria (including illegal or fraudulent activities), to prevent organisations from becoming or remaining certified when the specified criteria apply
- Stronger system to address incidents of companies or products that do not meet legal or ASC requirements
- Introduction of a risk-based approach to increased use of unannounced audits
- New definitions including seafood fraud.

5. What are the implications of the ASC CoC Module?

ASC CoC holders will need to comply with the new requirements in addition to the existing MSC CoC requirements. Conformity Assessment Bodies (CABs) will need to audit the new requirements in addition to the MSC requirements at CoC audits. Integrity of ASC certified products will be improved as a result, providing more value and a higher level of assurance to programme participants and customers who rely on the ASC logo.

6. Where can I find more information and details about the CoC Module?

Please visit the [ASC Traceability/ CoC webpage](#) to find the ASC CoC Module scheme document and other supporting resources such as translations, a checklist guide for supply chain companies, links to the CAB audit checklist and the product eligibility and sourcing guide referred to in CoC Module clause 1.1.3. You can find press releases on ASC's website [here](#) and [here](#) and on [MSC's website](#). Information on the CoC Module development process is available on the [CoC Module page](#), including a [public consultation summary and revisions report](#) and an [annex of responses](#).

7. Does the ASC CoC Module apply to all types of CoC certificates, including Group and CFO?

Yes, the CoC Module applies to all types of CoC certificates. However, certain requirements only apply to specific activities (e.g. food safety certification for processors and packers, see Question 9) or to companies that buy directly from farms.

8. Does the ASC CoC module apply to companies trading or handling seaweed?

No, the module does not apply to companies that have only seaweed in scope.

9. Which companies need to get GFSI-recognised scheme or ISO 22000 certification to maintain CoC certification?

The food safety requirement applies to CoC certificate holders with any of the following activities in the scope of their CoC certificate: processing, contract processing or packing/ repacking. These activities are defined in the CoC Certification Requirements (CR) v3.1, 'Table 4: Activity scope definitions.' Only sites that perform the specified activities need to be covered by GFSI-recognised or ISO 22000 certification.

An organisation's scope should include all activities undertaken with respect to certified products, including activities of non-certified subcontractors' (except for transportation).

Table 4 of the CoC CR v3.1 excludes the activities "retail to consumer" and "restaurant/takeaway to consumer" from the definition of "processing." This means that consumer-facing sites that conduct "retail to consumer" or "restaurant/ takeaway to consumer" activities would generally not have processing in scope, therefore there is no need to obtain GFSI-recognised scheme or ISO 22000 certification for consumer-facing sites with "retail to consumer" or "restaurant/ takeaway to consumer" activities in scope.

Activity 8. Processing	Includes all examples of processing including primary processing, secondary processing, value-added processing, fish preparation or any other activity where the product is changed (excluding activities undertaken by 10, 11 and 12 below).
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<p>Activity 11. Retail to consumer</p>	<p>This includes fresh fish counters at retailers, fishmongers or markets selling directly to consumers. The product will be taken away and prepared before being eaten by a consumer, or is sold in a traditional “retail” environment.</p>
<p>Activity 12. Restaurant/ takeaway to consumer</p>	<p>This includes any foodservice situation such as fish and chip shops, standard restaurants, and quick service restaurants, where the product is prepared on-site and sold directly to consumers as 'ready to eat', or eaten on-site</p>

10. Why did ASC select GFSI-recognised schemes and ISO 22000 only?

The Consumer Goods Forum’s Global Food Safety Initiative (GFSI) was created in 2000 to help build consumer trust in the safety of the food they buy. Food safety schemes recognised by GFSI have been successfully assessed against one of the world’s most widely accepted benchmarks for food safety programmes. Recognition by GFSI ensures high quality and consistency in the content and application of each recognised standard. GFSI is open to any schemes that wish to enter the benchmarking process.

In addition to the schemes recognised by the GFSI, following feedback gathered during public consultation, ASC broadened the acceptable standards to include ISO 22000. Input from consultation indicated that companies already hold ISO 22000 certification, which is considered acceptably robust to meet ASC food safety objectives. ASC’s acceptance of ISO 22000 certification, in addition to GFSI-recognised schemes, should reduce the impact of this requirement for some certificate holders.

11. Has ASC considered the impact of the proposed GFSI-recognised scheme or ISO 22000 certification requirement on small businesses?

Yes. Impact assessment through audit report reviews, surveys and interviews indicate the majority of CoC certificate holders already have a GFSI-recognised scheme or ISO 22000 certification. This requirement applies only to sites that perform higher risk activities, i.e., processing and packing.

Following input from public consultation, ASC also provided an exemption from the food safety requirement for small or less developed businesses which have less than EUR 2 million annual seafood turnover **or** less than 200 MT annual volume of seafood handled **or** less than 50 seafood-business staff (including at peak times).

Only one of the three thresholds must be met to be exempt. The exemption thresholds relate to the company's total seafood business, including certified and non-certified seafood.

12. What happens if my GFSI-recognised scheme or ISO 22000 certificate lapses or becomes invalid?

This would cause the ASC CoC certificate to be suspended until the GFSI-recognised scheme certificate becomes valid again. If the company also handles MSC product, only the ASC scope will be affected and the MSC CoC certificate will remain valid.

13. Do the new ineligibility criteria mean that ASC gets involved in the certification decision?

No, the ASC is not involved in certification decisions and independent CABs retain full responsibility for certificate status. The CoC Module includes a transparent list of criteria that would make a company ineligible to become or remain certified if triggered. There must be objective evidence that a criterion applies. ASC could determine a criterion applies based on objective evidence, but only the CAB can suspend a CoC certificate.

14. Will ASC CoC certification still be able to be obtained through a scope extension to MSC?

Yes, a scope extension to cover ASC CoC may still be obtained according to the current process under the CoC Certification Requirements clause 11.2.5. This requires the CAB to review available information and decide if on-site audit is needed. It is expected such scope extensions could be achieved remotely, subject to the CAB's decision.

15. Will the ASC CoC Module be audited in the same checklist as MSC CoC?

Yes, the CoC Module will be included in MSC's CoC Audit Platform when the platform is released in September 2023. Prior to release of the platform, audits are conducted using the [MSC CoC audit checklists](#), which include the CoC Module requirements. It remains one auditing and certification process.

16. Will the proposed requirements have an impact on my MSC CoC certificate?

No, the ASC CoC Module requirements are only applicable to ASC CoC certificates. If a certificate is suspended due to an ASC CoC Module requirement, the MSC CoC certificate is not affected.

17. Why is ASC adding these requirements, but MSC is not?

MSC recognises ASC's need to respond to aquaculture's shifting market requirements. MSC is supportive and directly collaborating with ASC on the ASC CoC Module on policy development. A number of ASC proposed requirements have also been identified as topics for future policy consideration including for wild caught and aquaculture supply chains. However, the changes from the MSC CoC programme review concluded in 2019 are still being implemented by global businesses and monitored by the MSC. MSC will liaise with ASC to understand the impact on supply chain and logo integrity and will consider this during the next CoC Standard revision in 2023.

18. Does the food safety eligibility requirement have to be met starting from 30 May 2023?

ASC provided a one-year extension to the initial implementation timing (a 'grace period') for the CoC Module food safety eligibility requirement.

At the first audit after the CoC Module becomes effective (30 May 2023), it is acceptable for companies to not yet have food safety certification in place (when applicable) without resulting in suspension of their CoC certificate. ASC CoC certificate holders and applicants must meet the food safety requirement (when applicable) after 30 May 2024.

The grace period is formalised in the CoC Module v1.1 clause 5.7.2.1.

19. Is IFS acceptable to meet the food safety requirement as a GFSI-recognised scheme?

Yes, provided IFS is a recognised scheme per [GFSI's website](#). IFS certificates issued during the three-month suspension of GFSI recognition from December 2022 to March 2023 are acceptable to meet the ASC requirement.

20. Where can I find training resources for the CoC Module?

Training for ASC CoC auditors is available to CABs on MSC's online training platform. For more information, please contact the MSC Training Team at onlinetraining@msc.org.

Certificate holder training webinars were held in February, March and April 2023. A webinar recording can be found [here](#).

21. Can variation requests be submitted for the CoC Module requirements?

Yes, variation requests may be submitted per the process defined in the MSC General Certification Requirements section 4.12.

22. Does the CoC Module food safety requirement apply to production of pet food?

No, the food safety requirement does not apply to production of pet food.

23. Where can I find the ASC sampling procedures?

These will be provided on request. Please contact assurance@asc-aqua.org.