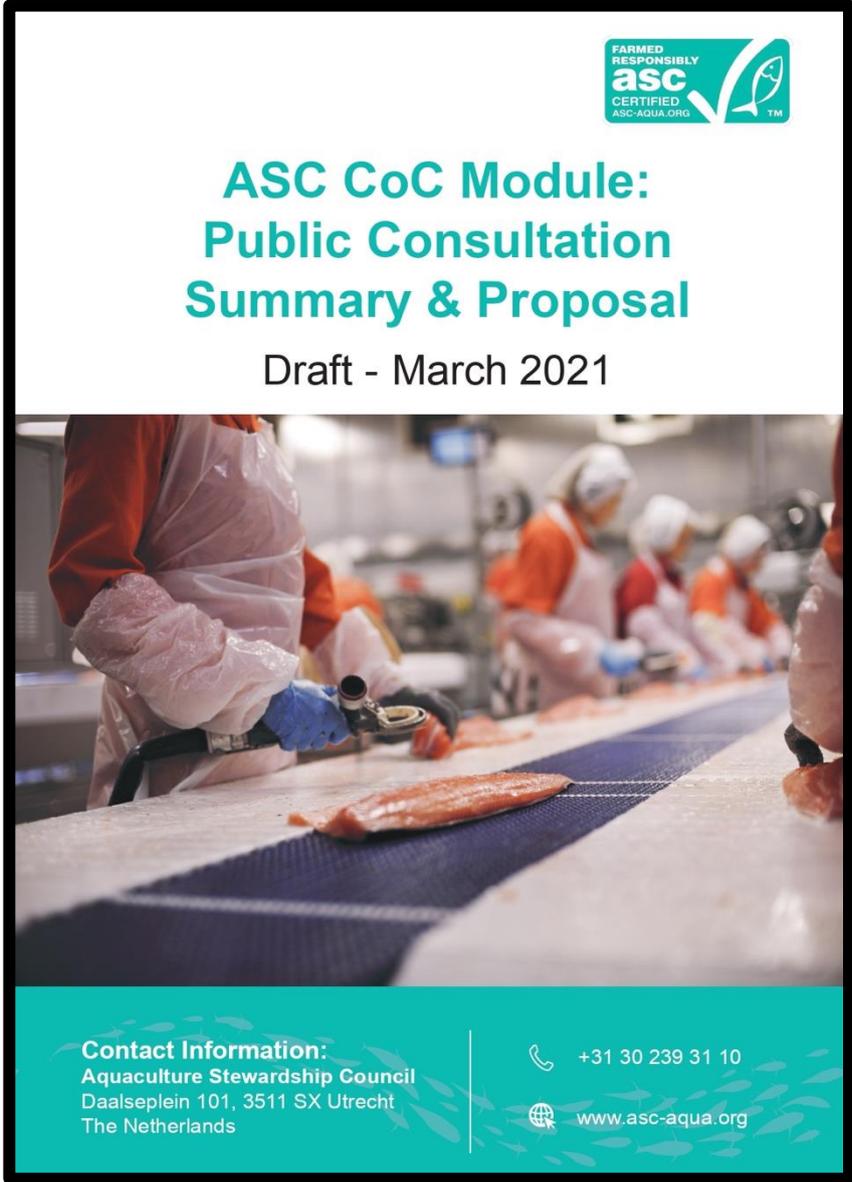


ASC CoC Module: Public Consultation Summary & Proposal Frequently Asked Questions (FAQs)

March 8 – May 7, 2021 Public Consultation



The image is a cover for a document titled "ASC CoC Module: Public Consultation Summary & Proposal Draft - March 2021". It features a white background with a teal border. At the top right is the ASC logo, which includes the text "FARMED RESPONSIBLY", "asc", "CERTIFIED", and "ASC-AQUA.ORG" next to a stylized fish icon. The main title is centered in teal and black text. Below the title is the text "Draft - March 2021". The central part of the cover is a photograph of a salmon processing line, showing workers in white protective suits and masks handling salmon on a blue conveyor belt. At the bottom, there is a teal banner with white text for contact information and icons for a phone and a globe.

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ASC CoC Module: Public Consultation Summary & Proposal

Draft - March 2021

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ASC Chain of Custody (CoC) Module– FAQs

1. Why is ASC introducing additional CoC Standard 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.

2. What is the timeline for the ASC CoC Module development and release?

The proposal is open for public consultation from 8 March to 7 May 2021. Requirements will be revised and improved as appropriate based on feedback from consultation. The revised requirements will be submitted to the ASC Technical Advisory Group for approval in early 2022. Pending approval and any further revisions required, the ASC CoC Module final version will be released in approximately the 1st quarter of 2022. The effective date will be six to twelve months after release (subject to feedback received) to allow adequate time for certificate holders, certification bodies and other stakeholders to prepare for implementation

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

Changes are proposed to the CoC Standard, CoC Certification Requirements, General Certification Requirements and Vocabulary. Changes will also need to be reflected in relevant sections of the audit checklist.

4. How did the ASC identify the areas where additional requirements are proposed?

The requirements were developed through an iterative process that started in 2019. A desired list of issues to be addressed was collated, followed by a series of internal ASC discussions and iterations of proposed draft clauses. The issues focused on challenges highlighted by ASC partners, certificate holders, stakeholders' previous inputs and ASC's own experience. Some issues raised included the need to:

- add more “teeth” to the programme to allow stronger response when problems arise,
- manage cases when antibiotics are detected in ASC shrimp (though cases are becoming less frequent),
- mitigate risk of seafood fraud and mislabelling,
- respond when organisations or products are not legally compliant or are not in conformance with ASC requirements,

- increase checks of physical products, and
- identify new ways to provide assurance.

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

ASC CoC holders will need to comply with the new requirements detailed in the proposal in addition to the existing MSC CoC requirements. 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. Does the ASC CoC Module apply to all types of CoC certificates, including Group and CFO?

Yes.

7. Which companies will need to get GFSI-recognised scheme certification in order to maintain CoC certification?

This requirement would apply to CoC certificate holders with at least one of the following activities in scope: processing, contract processing, packing or repacking. These activities are defined in the current CoC Certification Requirements v3.1, Table 4. Activity scope definitions.

8. If my company does not have GFSI-recognised certification, would other food safety certifications be recognised, e.g. ISO 22000?

In the current proposal, only schemes recognised by GFSI and listed on the [GFSI website here](#) are accepted. Currently these are: BRCGS, IFS, SQF, GAA and FSSC 22000. If you have ISO 22000, the most similar GFSI-recognised scheme would be FSSC 22000, which is based on ISO 22000 and includes many of the same elements. ASC certified products would also need to be compliant with applicable food safety laws and regulations.

9. Why did ASC select GFSI-recognised schemes only?

The Consumer Goods Forum (CGF) 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.

10: If we are a trader, but use a contract processor, would GFSI-recognised scheme certification be required for the contract processor rather than us as the trading company?

Yes.

11. Has it been considered to allow a joint audit process for CoC and GFSI-recognised schemes to optimise the certification process?

ASC recognises and supports efficiencies gained by joint audits. There is nothing to prevent joint audits currently. ASC is also exploring the possibility to develop joint audit checklists to facilitate combining audits.

12. What happens if my GFSI-recognised scheme 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 you also handle MSC product, only the ASC scope will be removed, and the MSC CoC certificate will remain valid.

13. Does the proposal for ASC to define ineligibility criteria affect the third-party independent nature of the ASC programme?

Ineligibility criteria would be defined transparently and applied consistently, to ensure that all certificate holders (or applicants) are affected equally and openly. The criteria are expected to be used in rare cases of fraud, illegal activities, or serious reoccurring non-conformance. In such cases, it is important to ensure that companies that do not operate responsibly are not associated with the ASC programme.

14. 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

15. How does the new proposed clause below differ from clause 3.1 and the associated guidance in the existing CoC Standard v5.0?

Existing CoC Standard v.5.0:

3.1 There shall be no substitution of certified products with non-certified products.

Guidance 3.1

This includes products sold as certified that are not eligible to be sold as certified by the farm, based on the requirements of the farm standard. These are non-certified even if from a certified farm.

ASC proposed changes:

[Add new proposed clause:] *The organisation shall implement an effective system to ensure product conformance with specifications in the relevant ASC standard(s) at all times while the products are under its ownership.*

[Add new proposed guidance to above clause:] *For example, this could include product testing, quality checks of incoming and outgoing product and/ or during handling and processing, risk assessment, due diligence etc. "Specifications" refers to product-specific requirements in applicable ASC farm standards. For example, this could include presence and/or level of antibiotics."*

Products sold as ASC certified are expected to be compliant with the ASC farm standard for the relevant species. This is currently indicated by Guidance 3.1. The new proposed clause elevates this from guidance to make it an explicit requirement. CoC certificate holders are responsible for ensuring product compliance, though the way they achieve this is flexible provided the system is effective. This is consistent with the overall approach of the CoC standard to have "effective systems in place" that are suitable to the certified organisation. Auditors are not expected to audit aspects of the relevant farm standard at CoC audits. However, this clause is available to be used for non-conformities if it is needed.

16. Will there be a transition period for companies who are currently ASC CoC certified to be able to meet the new requirements?

Yes, there will be a six to twelve month period after release of the ASC CoC Module before the new requirements become effective and mandatory, giving companies a period of time to be able to comply. The amount of transition time provided will be determined following input from this public consultation, based on the indicated degree of impacts.

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 areas for the next CoC Standard Review for wild caught and aquaculture supply chains, i.e. food safety, fraud mitigation, social requirements and traceability verification. However, the changes from the MSC CoC programme review concluded in 2019 are still being implemented by global businesses and monitored by the MSC. Many of the ASC proposals are specific to aquaculture, and align with the direction of the ASC Aligned Farm Standard in development, and do not immediately reflect needs of the wild capture sector. Internal research is underway, but MSC is not currently planning active policy development or changes in the wider CoC programme. The ASC CoC Module proposals will apply to ASC CoC certificate holders only, and their adoption will be evaluated as part of the next CoC Standard Review proposed for 2022. 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.

18. What is MSC doing about the additional ASC requirements relating to fraud, food safety, and electronic traceability?

MSC has identified fraud mitigation, food safety and electronic traceability as some of the key areas for research and further development. MSC is exploring alternative mechanisms outside of the Standard and Certification Requirements, for example through assurance mechanisms to ensure the MSC programme and logo integrity is maintained without adding to CHs and CABs audit burden. However, these new research areas are following a longer timeframe and are not yet ready for public feedback in 2021.

19. How is ASC ensuring the consultation process is transparent and open to all?

ASC is seeking feedback from a wide audience including existing and potential ASC CoC certificate holders (including those who also handle MSC products), certification bodies, ASC programme stakeholders and subject matter experts. Input is sought on the impact, value and logistics of implementation of the proposed new requirements. Consultation methods include seeking comments on the ASC website, supported by an [online survey](#). Existing communication mechanisms are also used to raise awareness of the proposal, e.g. regular calls, newsletters, and ASC marketing team engagements with stakeholders. This supplemental targeted messaging has been developed to support consultation. Targeted workshops will also be held with CABs and/or ASC partners to ensure representative feedback is obtained. All comments are appreciated and will be given due consideration.

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