

# **Unpackaged at Point-of-Sale Organization (UPOS) Module for the Unified Chain of Custody Standard**

Requirements for Organizations Handling Certified  
Seafood



**Version 1.0**  
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# Unpackaged at Point-of-Sale Organization (UPOS) Module for the Unified Chain of Custody Standard

## Module Genesis

This Module was created to augment the Unified Chain of Custody program and provide an opportunity for Unpackaged at Point-of-Sale (UPOS) Organizations to be certified to the Unified Chain of Custody Standard in a manner consistent with other globally accepted sustainability standards<sup>1</sup>. This Module shall be used in conjunction with the existing Unified Chain of Custody Standard V2.6, or most current version, when certifying UPOS organizations. It applies and modifies several existing standard clauses while also adding additional process requirements for compliance.

## About this document

This UPOS Module V1.0 will be used in supply chains and by point-of-sale organizations that are selling seafood from certified fisheries . This module contains mandatory requirements for UPOS Organizations seeking Unified Chain of Custody Standard certification based on V2.6/UPOS.

## General introduction

A Chain of Custody (CoC) certification provides credible assurance that products sold through licensed use of the certification ecolabel or trademark will communicate to customers and consumers the provenance of seafood from certified fisheries and can be traced throughout the supply chain to a certified source. Organizations certified against the Unified Chain of Custody Standard are audited by third-party accredited Certification Bodies (CB) and are subject to periodic surveillance audits over the three-year period of a CoC certificate.

Through the program framework, the requirements for CoC certification will be subject to continual review and improvement to ensure that it continues to serve stakeholder and consumer needs.

## Scope and options for CoC certification

Any organization trading or handling products from a certified fishery is eligible to have CoC certification. CoC certification is a requirement for each organization in the supply chain taking legal ownership of certified products that wish to make a claim on the certified source, up to the point where products are packed into consumer ready packaging.

There are three options for certification:

- Single site certification (Std sections 1-4)
- Multi-site certification (Std sections 1-7)
- UPOS (UPOS Module)

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<sup>1</sup> Marine Stewardship Council. *MSC Chain of Custody Standard: Consumer-Facing Organisation Version 2.1*, 15 May 2023

The UPOS Module is an add-on to either of the other certification types, and UPOS clients can be either single or multi-site.

## Principles of the Process

To become certified as meeting the Unified Chain of Custody Standard V2.6, UPOS organization Applicants must be able to demonstrate compliance with the Standard and this Module, through an independent audit by an approved CB.

The CB must be approved and be accredited to ISO/IEC 17065:2012 (Conformity assessment - Requirements for bodies certifying products, processes, and services) by an accreditation body who is a member of the International Accreditation Forum (IAF).

The chosen CB will formulate a contract between the company and the CB detailing the requirements and commitments needed from the company.

The objective of CoC certification is to provide an assurance to a certified claim on a seafood product that the product originates from a certified fishery.

## Definitions

**Applicant:** A company or group of companies in the supply chain that has formally applied to meet the Unified Chain of Custody Standard and/or the UPOS Module through the formal Application Form.

**Central Office:** A legal entity with control of a common management system, control over all included sites either through ownership or contractual agreement, and purchasing control of all certified product.

**Certification Mark:** A distinctive logo, trademark or seal which has been approved by the standard owner and verifies that the fish has been sourced from and is traceable back to a Certified Fishery.

**Certified Chain:** All certified stages demonstrating traceability back to a Certified Fishery.

**Certified Fishery:** A fishery that has been independently certified as meeting the Alaska Responsible Fisheries Management (RFM) Standard or Iceland Responsible Fisheries Foundation Responsible Fisheries (RFM) Management Standard, or Certified Seafood International (CSI) Fisheries Standard.

**Chain of Custody (FAO Definition):** *The set of measures which is designed to guarantee that the seafood product put on the market and bearing the ecolabel logo is really a product of designated origin and coming from the certified fishery concerned. These measures thus cover both the tracking/traceability of the product all along the processing, distribution, and marketing chain, as well as the proper tracking of the documentation and control of the quantity concerned.*<sup>2</sup>

**Chain of Custody Registration Number:** A Unified Chain of Custody Standard certificate registration number issued by the Certification Body to each company certified to the Unified Chain of Custody Standard.

**Chain of Custody Standard:** The list of requirements that the applicant must meet to claim certification to the Unified Chain of Custody Standard and /or use the certified claim.

**Multi-site Organization:** An Applicant that has more than one site under its direct control and applies for certification for these sites. This certification is applicable to any multi-site organization handling or trading certified products where the organization has identified a designated central office function which operates in conformity with requirements of sections 5.0 to 7.0 of the Unified Chain of Custody Standard. In this case

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<sup>2</sup> FAO Guidelines for the Ecolabelling of Fish and Fishery Products from Marine Capture Fisheries.

every site under the scope of certification conforms with sections 1.0 to 4.0 of the Unified Chain of Custody Standard Requirements.

**Operations Site:** Any site that stores, processes, packs or labels certified product for distribution onto other unpackaged at point-of-sale sites within the same certified organization. While an operations site may sell or serve some of their products to the final consumer, they do not do so exclusively.

**Service Provider:** A third party or affiliate that is appointed to perform transportation, distribution or storage activities for the Applicant without taking legal ownership of the product.

**Single-site Organization:** A sole applicant for certification at a single discrete physical location, that complies with sections 1.0 to 4.0 of the Unified Chain of Custody Standard Requirements.

**Site:** A site is a permanent location where an organization carries out work or a service.

**Stage:** A handling / transfer point in the supply chain e.g., vessel, packing, processing, distribution, sales.

**Subcontractor:** A third party or affiliate that is appointed to perform processing, packing,, labelling or other product transformation activities for the Applicant without taking legal ownership of the product.

**Temporary Site:** A temporary site is one set up by an organization to perform specific work or a service for a finite period of time and which will not become a permanent site.

**Unpackaged at Point of Sale Module:** The list of requirements that UPOS applicants must meet in addition to or instead of the Unified COC Standard to claim certification to the Unified Chain of Custody Standard V2.6/UPOS and use the certified claim.

**Unpackaged at Point-of-Sale Organization:** An applicant that serves or sells certified seafood products to the final consumer that are not in a consumer-ready, tamper-proof packaging form. These products may require onsite handling and preparation prior to sale and may or may not be identified with a certification mark. UPOS organizations can consist of a single site or multiple sites.

**Unpackaged at Point-of-Sale Site:** A discrete physical location of an Unpackaged at Point-of-Sale Organization (such as a restaurant location, fish market, or retail site).

# Outline of the Chain of Custody Process

The Unified Chain of Custody Unpackaged Point-of-Sale Certification process is managed by the approved independent CBs listed on the respective program<sup>3</sup> websites. The certification process has several distinct stages which are described below.

## Unpackaged at Point-of-Sale Organization

The initial step for applicants is to determine whether they are eligible for certification under the UPOS Module to the Unified Chain of Custody Standard.

### ***Unpackaged at Point-of-Sale Organization***

An Applicant that serves or sells certified seafood products to the final consumer that are not in a consumer-ready, tamper proof packaging form. These products require onsite handling and preparation prior to sale and may or may not be identified with a certification mark. UPOS organizations can consist of a single site or multiple sites.

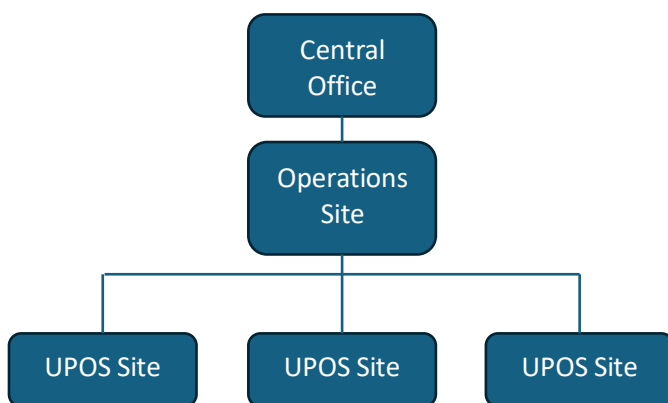
UPOS Operations sites that perform storage, processing, packing, and/or labeling activities are required to be within the applicant's certificate scope.

Where the Applicant utilizes the services of an offsite subcontractor (carrying out contract processing, packing or labeling activities), the subcontractor shall be certified to the Unified Chain of Custody Standard.

If the Applicant has more than a single site handling certified seafood:

The multi-site organization shall either:

- be a legal entity with direct control over the sites and purchasing of the certified product, or;
- have a signed contractual agreement between the central office and each site that is included in the application. The central office shall have control over purchases conducted at site level, with procedures to ensure that all sites can only order certified seafood from certified suppliers.



**Fig. 1. Example structure of an Unpackaged at Point-of-Sale (UPOS) organization.**

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<sup>3</sup> <https://csicertified.org/chain-of-custody/coc-certification-bodies/>

## Stage 1. Information Request

Applicants for UPOS may be single-site operations, multi-site organizations, retailers, or restaurants. To determine if an organization is eligible for UPOS, the entity should contact a CB and provide them with relevant information.

In turn, applicants may request information from the Standard owner organization or the CB about the certification process, the Standard requirements, the estimated costs, or timeframes to gain certification.

Applicants are advised to carry out a self-assessment against the Unified Chain of Custody Standard and UPOS Module to ascertain their readiness for external audit prior to submitting their application.

Applicants are advised that all information given to the CB will remain confidential.

## Stage 2. Completion of Application Form

Applicants will be requested to formally provide information on their product handling details and their product supply chain to the CB, using the Unified Chain of Custody application forms.

Note that UPOS Organizations must provide the details of **all sites** to be included within the scope of certification in the application.

UPOS Organizations are also subject to additional application requirements:

- The central office will be required to have a contractual agreement with the CB to ensure that the Unified Chain of Custody Standard and UPOS Module are fully implemented and enforced at all of the participating sites.

When the completed application form is received by the CB the applicant is allocated a unique chain of custody registration number.

## Stage 3. Certification Body prepares an Audit Plan.

Each organization and its supply chain are different and therefore the CB will create a relevant audit plan to validate the chain of custody for the applicant's relevant product and supply chain as detailed in their application form.

The Applicant will be required to ensure that they can source product traceable back to the certified fishery, from an organization(s) that hold valid Unified Chain of Custody Certification.

The CB will provide the Applicant with an audit plan and audit cost based on the information provided in the application form.

### **Additional requirements for Unpackaged at Point-of-Sale Organizations**

The audit plan considers the number of sites to be included within their scope of certification and their respective risk according to the activities conducted at each.

The CB shall inform the client that for applicants with multiple sites, the central office, operations sites (where relevant) and a sample of unpackaged at point-of-sale sites will be audited. The number of selected sites will be chosen based on Table 1. For Surveillance and Recertification Audits, the number of sites sampled may be lowered based on the risk assessment score (Table 2). Any client with at least three Yes/Low Risk responses in Table 2, is eligible for Low Risk sampling during Surveillance and Recertification audits.

**Table 1: Number of sites to be audited for UPOS organizations according to audit type (initial, surveillance or recertification) and risk level (normal risk or low risk).**

Total number of sites	Number of sites to be audited		
	Initial Audit	Surveillance or Recertification Audit	
	(risk unspec.)	Normal Risk	Low Risk
1 to 3	1	1	1
4 to 6	2	2	1
7 to 16	3	3	2
17 to 49	4	4	2
50 to 100	5	5	3
101 to 144	6	6	4
145 to 196	7	7	5
197 to 256	8	8	5
257 to 324	9	9	6
325 to 400	10	10	6
401 to 484	11	11	6
485 to 576	12	12	7
577 to 676	13	13	7
677 to 784	14	14	8
785 to 900	15	15	8
901 to 1024	16	16	8
Over 1024	Square Root multiplied by 0.5 rounded up	Square Root multiplied by 0.5 rounded up	Square Root multiplied by 0.25 rounded up

Additionally, operations sites that carry out processing, repacking or labeling activities of certified products shall be audited in addition to the sample size determined by Table 1. Where the UPOS has operations sites involved in only storage or distribution, at least one of them shall be audited in addition to the number of UPOS sites sampled during the initial audit and each subsequent recertification audit.



**Table 2. Risk assessment of UPOS organizations for surveillance and recertification audits.**

Risk Criteria	Mitigating Factor	Low Risk	Normal Risk
A. Centralized oversight	Does the central office conduct internal audits against the Unified UPOS certification scheme at every site and maintain records of those audits?	Yes	No
B. Performance consistency across sites	Did the client demonstrate reasonable conformity with the standard at the previous audit (i.e., no Major nonconformities were raised)?	Yes	No
C. Site Level Training	Does the organization have a documented method for measuring the effectiveness of site level training?	Yes	No
D. Internal Traceability Control	Does the Applicant test the efficacy of their batch control and traceability system through a thorough documented traceability challenge (backwards and forwards) and a quantity check/ mass balance?	Yes	No
E. Ability to address problems with internal processes	Does the Applicant have a documented procedure for handling non-conformities to this standard?	Yes	No

## Stage 4. The Audit(s)

The assessment of the Applicant company's facility/facilities is carried out by an independent auditor(s) approved and acting for the CB.

It is the Applicant's responsibility to ensure that the information supplied in the application form is factual and accurate so that the audit plan remains relevant.

The CB's assessor will carry out the assessment in an independent, professional, and courteous manner.

Key components of the Chain of Custody Standard include requirements for:

- product identity system.
- traceability system; and
- segregation system.

## Stage 5. Audit Report

During the assessment process, the assessor will compile an audit report on how the Applicant complies with the requirements of the Unified Chain of Custody Standard and UPOS Module.

If more than one auditor is involved in the Assessment Stage, the CB shall designate a lead auditor whose responsibility is to consolidate the findings from all the auditors and to produce a synthesis report.

The Unified Chain of Custody Standard will require specific interpretations of the clauses by the auditor to ensure they relate accurately to different COC activities including packing, processing, distribution and selling of seafood products and materials.

The assessment report will identify any non-conformities against the Unified Chain of Custody Standard and the UPOS Module. The Applicant will be required to provide corrective action evidence to the assessor for identified non-conformities within 28 calendar days from close of assessment.

The certificate will not be issued if non-conformities found during an initial audit are not corrected or downgraded within the 28-day calendar period.

Full details as to what constitutes a non-conformance can be found in the CSI QMS Procedure 4 (<https://csicertified.org/about/quality-management/>).

## Non-conformity Classification

**Minor non-conformities:** raised during surveillance or re-certification audits (or any other time after initial certification) shall be closed *within 28 days of detection*.

If the minor non-conformity is not corrected *within 28-day maximum timeframe*, the non-conformity shall be re-graded as a major non-conformity; and resultant conditions apply.

**Major non-conformities:** raised during surveillance or re-certification audits (or any other time after initial certification) shall be closed or downgraded *within 28 days of detection*.

If the major non-conformity is not addressed within the 28-day maximum timeframe, *suspension or withdrawal of the certificate and a full re-audit may be initiated*.

**Suspension:** raised during surveillance or re-certification audits (or any other time after initial certification). Cause for suspension includes, among other things, the selling of non-certified product as certified.

### Non-conformities at UPOS Organizations

For UPOS clients, all nonconformities shall be raised against the central office, even if detected at site level.

For UPOS certified clients, if noncertified product is found to be identified as certified at the point-of-sale or serving to the final consumer nonconformances shall be considered:

- As a major non-conformity if the auditor determines that the cause of the mislabeling was due to an individual not following established internal procedures.
- As a cause for suspension in all other cases.

For UPOS clients, where major non-conformities are detected at a surveillance or re-certification audit, and the certificate is not suspended, the CB shall carry out remote follow-up site audits within 90 days of the original audit.

- Follow-up site audits shall include at a minimum a review of the non-conformity, a traceability test, and personnel interviews, but do not need to cover the full Unified Chain of Custody Standard and UPOS Module.
- The audited sites shall include at least each site where a major non-conformity was detected, and:
  - For clients with 6 or more sites, 1 additional site should be audited.
  - More sites may be audited where the CB deems it necessary.
- Where an additional major non-conformity is raised against the same clause during the follow-up audits, the CB shall suspend the certificate.

## Stage 6. Certification Decision

The Applicant's audit report and any necessary corrective actions will be submitted to a certification committee for a certification decision.

The certification committee is composed of a person or persons with equal competence to the auditor and with expertise in certification.

### **Additional conditions for UPOS Organizations**

If any site has a non-conformity during an initial audit, certification shall be denied to all sites included under the scope of certification by the Applicant pending satisfactory corrective action.

## Stage 7. Certification

When certification has been approved, the Applicant shall be notified within 10 working days of the certification decision. Following this notification, a Certificate will be issued to the applicant company.

The Certificate remains the property of the CB and the control and management of the status of a certificate shall be in place.

Certificates are valid for three years with annual surveillance audits. On-going certification is maintained where there is substantive and demonstrable evidence that the Applicant remains in compliance with the criteria of the Standard. Any non-conformity raised shall be verified as closed, with objective evidence within defined timescales. Full details of required time scales can be found in CSI QMS QP4 Section 9 (<https://csicertified.org/about/quality-management/>)

The scope of certification covers:

- an Organization's activities.
- only those certified products and suppliers nominated by the Organization and notified to the CB

Following an initial audit, the Applicant will be awarded certification for its facility/facilities if it meets the Unified Chain of Custody Standard and UPOS Module and all non-conformities are satisfactorily closed and/or addressed.

Eligibility for continued certification is maintained where there is substantive and demonstrable evidence that the company continues to conform to the criteria of the Standard and UPOS Module. Any non-conformities raised shall be verified as closed, with objective evidence within the defined timescales.

### **Scope of certification for UPOS Organizations**

- the scope of certification applies only to those sites that have been notified and included in the site register submitted to the CB by the Organization *and* have been eligible for inspection.
- sites identified on the site register may trade products with claims of being certified.

## Stage 8. Access to Certification Mark and Statement

The central office of the certified organization can apply to the Standard owner for a permit to use the program certification marks, as applicable.

## Appeals

The Applicant has the right to appeal the certification decision of the CB. Appeals shall be made in writing within seven days of the certification decision.

A full response will be given by a CB representative independent of the assessor and certification committee.

## Further information

Further information regarding application, rules and regulations can be obtained from the Standard owner or the CBs:

**Certified Seafood International**

2659 State St #100

Carlsbad, CA 92008

United States of America

[www.csicertified.org](http://www.csicertified.org)

**Iceland Responsible Fisheries Foundation**

Grandagarður 16

115 Reykjavik,

Iceland

<https://www.responsiblefisheries.is/>

Approved CBs are listed on the Standard owner website above.

# Clauses from the Unified Chain of Custody Standard V2.6 applicable to UPOS Module and UPOS-specific Clauses

The sections below contain clauses from the Unified Chain of Custody Standard v2.6 as well as several new clauses specifically applicable to the UPOS module. Each clause is denoted with one of four descriptors:

- **NOT APPLICABLE:** Indicates the clause from the Unified CoC Standard V2.6 is not applicable to the UPOS Module
- **UNCHANGED:** Indicates the clause from the Unified CoC Standard V2.6 applies to the UPOS Module exactly as written.
- **REVISED TO:** Indicates the clause from the Unified CoC Standard V2.6 is revised for UPOS Module application.
- **NEW CLAUSE:** Indicates the clause has been added specifically for the UPOS Module.

## 1.0 General Principles of Traceability for Chain of Custody

1.1 NOT APPLICABLE

1.2 UNCHANGED

1.3 UNCHANGED

1.4 **REVISED TO:** The Applicant shall have a traceability system that can identify the certified seafood products and enable tracking from receipt, during intake, processing, storage, dispatch handling and delivery to customer. For UPOS operations traceability tests on any labelled product sold as certified or product associated with a program claim at the Point-of-Sale or serving:

1.4.1 shall link input to output or vice versa at the time of the audit through labelled product or product associated, internal traceability records, or a delivery or transfer note that identifies the certified supplier.

1.5 UNCHANGED

1.6 UNCHANGED

1.7 **REVISED TO:** Where the Applicant utilizes the services of a subcontractor performing processing, packaging, or labelling activities, the Subcontractor shall be certified to the Unified Chain of Custody Standard.

1.8 UNCHANGED

## 2.0 Traceability within the Supply Chain

2.1 **REVISED TO:** Each seafood consignment shall be traceable back to the certified supplier. The traceability system for a UPOS organization handling certified seafood shall allow:

- species name to be verified from supplier (Product may be sold under common name);
- Country of origin to be verified from supplier;
- Any product sold as certified at a “Unpackaged at Point-of-Sale site” to be traced from the sales invoice or point of serving back to certified deliveries;
- Any certified product comprising mixtures of certified ingredients to be traced from the point of input back to all certified suppliers;
- Any product handled as certified at an “operations site” to be traced from the point of dispatch back to a certified supplier; and
- All transfer of certified product between sites to be traced at every stage.

2.1.a **NEW CLAUSE:** There shall be no substitution of certified products with non-certified products.

2.2 UNCHANGED

2.3 UNCHANGED

2.4 UNCHANGED

2.5 NOT APPLICABLE

2.6 NOT APPLICABLE

### 3.0 Traceability and Labelling

3.1 NOT APPLICABLE

3.2 UNCHANGED

3.3 UNCHANGED

3.4 **REVISED TO:** The Applicant shall be able to track and trace the certified product one step forward and back to the certified supplier.

3.5 **REVISED TO:** Excluding the sale to the final consumer, each certified product shall be labelled with all necessary information which is appropriate for the Applicant's stage in the supply chain. The information should at minimum include the following:

- commercial species name.
- country of harvest.

3.6 **REVISED TO:** Certified products shall be identified as certified at all stages of purchasing, receiving, storing, processing, packing, labelling, selling and delivering, except for sales invoices to final consumers.

3.7 **REVISED TO:** The Applicant shall operate a secure system for the production, storage and application of product labels bearing a certification mark; and will ensure that only certified seafood product is labelled as such.

3.8 **REVISED TO:** A record of all certified incoming products shall be maintained showing the name of the supplier, their unique chain of custody certificate number, evidence of Unified Chain of

Custody certificate validity, and sufficient other details to allow the tracing of those inputs back to their suppliers.

- 3.8.a **NEW CLAUSE:** If certified and non-certified products of the same (or similar) species are handled at the same time, the applicant shall maintain records of non-certified seafood purchases or deliveries for these similar species.

- 3.9 **REVISED TO:** Traceability records shall be kept for a reasonable period to correspond with the shelf life of the product and/or a minimum of 18 months whichever is longer. Traceability records shall be accurate, legible and unadulterated.

- 3.10 **REVISED TO:** The Applicant shall have a procedure for handling non-conformities to this Standard. Procedure shall include:
- identification of details of the non-conformity.
  - identification of the person responsible for addressing non- conformity.
  - development of corrective action.
  - verification that the corrective action has been implemented and the non- conformity closed within 28 days.

- 3.11 NOT APPLICABLE

- 3.12 NOT APPLICABLE

- 3.12.a **NEW CLAUSE:** The organisation shall have a process for managing non-conforming product across all sites that includes the following requirements:
- Immediately cease to sell any non-conforming product as certified, until the certified status has been verified in writing or electronic communications by the CB.
  - Notify the CB within 2 working days of detecting the non-conforming product and provide the CB with all necessary information to verify the origin of the non-conforming product.
  - Identify the reason the product is non-conforming and implement measures to prevent re-occurrence where necessary.
  - For any non-conforming product that cannot be verified as coming from a certified source, re-label or repack this product to ensure it is not sold as certified.

- 3.13 UNCHANGED

## 4.0 Training

The Applicant shall put in place documented programmes covering the training needs of all relevant personnel.

- 4.1 UNCHANGED

- 4.2 UNCHANGED

# Additional Chain of Custody Standard Requirements for Multi-site UPOS Organizations

This section details the set of requirements that shall be certified as being in place where the Applicant is a Multi-site UPOS Organization; these requirements apply to the designated central office.

## 5.0 Organizational Integrity

**5.01 NEW CLAUSE:** If the applicant has multiple sites handling certified seafood, the applicant shall designate a central office that is responsible for overseeing and maintaining a common management system to ensure conformity across all sites.

The central office shall:

- Have procedures in place to ensure that all sites handling certified seafood meet the requirements of this Standard.
- Have a system in place to ensure that all sites can only order and sell/serve certified seafood from certified suppliers, covered by its scope of certification.
- Maintain an accurate list of all sites, which includes the address and contact details for each site and distinguishes between UPOS and Operations sites.
- Provide a current and complete site list within 5 days of receiving a written request from the program owner or the CB.
- Have a process to ensure that any sites that are cancelled, suspended, or withdrawn from the certificate cannot continue to use the certification mark or other trademarks.

5.1 UNCHANGED

5.2 UNCHANGED

5.3 NOT APPLICABLE

5.4 NOT APPLICABLE

5.5 NOT APPLICABLE

5.6 UNCHANGED

5.7 UNCHANGED

5.8 UNCHANGED.

## 6.0 Management of members

6.1 NOT APPLICABLE

6.2 REVISED TO: The applicant shall inform their CB in writing or by email within 10 days of any of the following changes:



- New CoC contact person within the organization.
- An increase in total number of UPOS sites by more than or equal to 25% since the previous audit.

**6.2.a NEW CLAUSE:** The organization shall receive written approval from their CB before making any of the following changes:

- Undertaking a new activity with respect to certified products, that is not already included in the scope of certification.
- Using a new subcontractor that does contract processing or repacking of certified products.
- Adding any new operations sites that are involved in processing or repacking of certified products only.
- Adding any new UPOS site that operates in a new country.

6.3 NOT APPLICABLE

6.4 UNCHANGED

## 7.0 Central office control and responsibilities

7.1 NOT APPLICABLE

7.2 UNCHANGED

7.3 REVISED TO: The Applicant shall have a procedure for handling non-conformities to this standard. Procedure shall include:

- clearly details of the non-conformity.
- identification of the responsible person assessing non-conformity.
- root cause analysis.
- development of corrective action plans and timescale; and
- documented verification that the corrective action has been implemented and the non-conformity closed within 28 days.

7.4 NOT APPLICABLE

7.5 NOT APPLICABLE

7.6 NOT APPLICABLE

7.7 NOT APPLICABLE

7.8 NOT APPLICABLE

7.9 NOT APPLICABLE

7.10 NOT APPLICABLE

7.11 REVISED TO: All traceability records shall be kept for a reasonable period to correspond with the shelf life of the product or for a minimum of 18 months whichever is longer. Traceability records shall be accurate, legible and unadulterated.

**References:**

1. Marine Stewardship Council. *MSC Chain of Custody Standard: Consumer-Facing Organisation Version 2.1*, 15 May 2023
2. Marine Stewardship Council. *MSC Chain of Custody Certification Requirements Version 3.2*, 15 May 2023