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# Chain of Custody Standard

## Version 2.0

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**Marine Eco-Label Japan Council  
(2018)**

## Introduction

The Marine Eco-Label Japan (MEL) Council has developed a certification standard for Chain of Custody (CoC) to ensure that the seafood products bearing the ecolabel logo or sold as certified products are in fact produced from fishery products conforming to either the MEL Fisheries Management Standard (hereinafter “FMS”) or MEL Aquaculture Management Standard (hereinafter “AMS”). At all stages of the supply chain from producers to consumers, through processing, distribution, marketing, retailing, food and beverage service provision, etc., all entities that are physically handling the certified products must comply with this MEL Chain of Custody (CoC) Standard (CoCS).

The MEL CoC Standard consists of four chapters of requirements.

1. Eligibility requirements for applicants
2. General requirements for management system
3. Requirements for segregation and traceability
4. Requirements for logo management

Each chapter contains detailed requirements applicants must satisfy to be certified as conformant with the MEL CoCS.

## References

- Marine Eco-Label Japan Fisheries Management Standard (Ver.2.0)
- Marine Eco-Label Japan Aquaculture Management Standard (Ver.1.0)
- Marine Eco-Label Japan Regulations for the Use and Management of Logo
- ISO 9001: 2015 Quality Management Systems—Requirements
- ISO/IEC 17065: 2012 Conformity Assessment—Requirements for Bodies Certifying Products, Processes, and Services
- ISO/IEC17067: 2014 Conformity Assessment—Fundamentals of Product Certification and Guidelines for Product Certification Schemes
- FAO Code of Conduct for Responsible Fisheries
- FAO Guidelines for the Ecolabelling of Fish and Fishery Products from Marine Capture Fisheries (Revision 1)
- FAO Guidelines for the Ecolabelling of Fish and Fishery Products from Inland Capture Fisheries
- GSSI Global Benchmark Tool (Version 1)

## Terms and definitions

- **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 coming from the certified fishery concerned. These measures should 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).* (FAO Guidelines for the Ecolabelling of Fish and Fishery Products from Marine

Capture Fisheries)

- **Subcontractor:** All entities handling certified seafood products that have entered into contracts with applicants. However, this does not include entities who distribute, store, or sell unopened packaged products. Entities using subcontractors are considered type B multi-site applicants under the MEL CoC Standard.
- **Processing:** Modification process of the certified seafood product
- **Production-stage certification standard:** FMS and AMS of MEL
- **On site:** Place where certified seafood products are handled
- **Packaging/repackaging:** Process of changing the packaging of certified seafood without any product modification
- **Site:** A place defined by a single address handling the certified seafood products
- **Supply chain:** All stages through which certified seafood products reach consumers from producers via processors, distributors, retailers, food and beverage service providers, etc.
- **Applicant:** A company or group of companies in the supply chain applying for CoC Certification or an already certified entity
- **Single-site applicant:** An entity with a single site for handling certified seafood products
- **All the stages:** All the stages within applicant sites directly involving certified seafood products, including purchasing, storage, processing, packaging/repackaging, and shipping
- **All the involved parties:** All concerned parties directly handling certified seafood products within applicant sites
- **Traceability:** Mechanism for accurately tracking certified products back to the certified fishery or aquaculture by referencing the records pertaining to production
- **Certified Fisheries/Aquaculture:** Fisheries/Aquaculture that have acquired MEL Fisheries or Aquaculture Certification
- **Certified seafood (/ marine/ fisheries) products:** Seafood (/ marine/ fisheries) products supplied by certified fisheries/aquaculture, or processed products that are produced from certified products
- **Certified entities:** Entities that have acquired MEL Fisheries, Aquaculture, or CoC Certification
- **Multi-site applicant:** An entity with multiple sites for handling certified seafood products. There are three different types of multi-site applicants. (See Appendix 2 regarding requirements for multi-site applicants.)
  1. Type A multi-site applicant: entity with unified management system for all sites
  2. Type B multi-site applicant: entity consisting of contracting companies and subcontractors.
  3. Type C multi-site applicant: entity consisting of retailers with multiple stores selling or supplying certified seafood products to final consumers
- **Non-certified seafood product:** All seafood products supplied by other than certified fisheries/aquaculture
- **Non-certified product:** All products other than certified that were input and mixed with certified seafood products at the processing stage
- **Non-conforming certified seafood product:** A product that, despite being sold as a certified seafood or bearing the ecolabel logo, for some reason became nonconformant
- **Segregation:** Non-mixing or non-mingling of certified and non-certified seafood products

## **1 Eligibility requirements for applicants**

- 1.1.** Applicants shall comply with the relevant domestic laws, when handling certified seafood products, non-certified seafood products, and other products.
- 1.2.** Applicants shall verify that their immediate suppliers have acquired MEL Fisheries or Aquaculture Certification or CoC Certification. An applicant that purchases certified seafood products from entities distributing, storing, or selling in unopened packages shall further verify that the suppliers of said entities have acquired MEL Fisheries or Aquaculture Certification or CoC Certification.
- 1.3.** Multi-site applicants, in addition to the requirements defined in the MEL CoC Standard, shall meet additional requirements stipulated in Appendix 2, section 1.

## **2 General requirements for management system**

### **2.1. Establishment of a management system**

- 2.1.1.** The applicant shall position at least one manager responsible for management and control of all stages of handling certified seafood products and other associated duties, namely segregation, traceability, and managing logo use.
- 2.1.2.** The applicant shall produce documentation of CoC procedures. This documentation shall include the following:
  - Organizational structure, responsibility and authority related to the CoC
  - Flowcharts of certified fishery products and procedures for satisfying requirements noted in sections 3 and 4 of the MEL CoC Standard.
- 2.1.3.** The applicant shall retain records from all the stages relating to the certified seafood products in a state available for presentation, for the duration of the CoC certification validity period of three years at least. When shipped certified marine products may be stored for periods of over three years (e.g. considering sell-by dates), the records must be kept available for presentation for the duration of the period that the certified products in question are stored.
- 2.1.4.** The applicant shall produce documentation of procedures for document the procedure for receiving and handling complaints and/or comments regarding certified seafood products from consumers or the recipients of their shipments. The applicant shall also set up a system for handling complaints based upon this procedure documentation.
- 2.1.5.** The applicant shall produce documentation of procedures for recalling/ retrieving non-conforming certified seafood products. The applicant shall also set up a system for recall and retrieval based on this

procedure documentation and, when non-conforming certified seafood products are discovered, the applicant shall follow this procedure and recall/retrieve the seafood products in question.

- 2.1.6.** Single-site applicants should preferably set up a system that enables corrective measures regarding non-conformities and internal audit structures as stipulated in Appendix 1. When such system has been set up, the applicant concerned can be considered low-risk and given preferential treatment when undergoing an audit by Certification Bodies. Details are stipulated in “Requirements for Certification Bodies Certifying the MEL CoC Standard.” (hereinafter “RCB(CoC)”)

## **2.2. Reporting changes**

- 2.2.1.** If the applicant purchases certified seafood products from a newly certified entity and/or purchases any newly certified fish species, the applicant shall notify the Certification Body in writing or via digital means within one month after the date of this change.

- 2.2.2.** The applicant shall receive written permission from the Certification Body before undertaking the following changes.

1. Conducting new business/work concerning certified seafood products that is not included under CoC Certification
2. Contracting a new subcontractor to do work involving the handling of certified seafood products.

## **2.3. Multi-site applicants**

- 2.3.1.** Multi-site applicants, in addition to the requirements of the MEL CoC Standard, shall satisfy additional requirements related to the management system stipulated in Appendix 2.

## **3 Requirements for segregation and traceability**

- 3.1.** The applicant shall have a system in place that enables confirmation of the fact that purchased certified marine products have been supplied by certified fisheries and have been processed and distributed only by entities who have received CoC certification. The system must be such that the following items can be confirmed.

1. Supplier
2. Supply date
3. Supply weight
4. Production-stage certification status, or CoC certification status, of immediate supplier

- 3.2.** The applicant shall have a system in place that ensures certified marine products can be identified and segregated at all stages. Preferably, in addition to the appended traceability records, there will also be labels or signs attached to certified marine product bulk containers, packaging, etc. When such system has been set up, the applicant concerned can be considered low-risk and given preferential treatment when

undergoing an audit by Certification Bodies. Details are stipulated in the RCB(CoC)

- 3.3. The applicant shall have in place mechanisms for ensuring segregation at all stages. The applicant shall implement temporal separation or physical separation.
- 3.4. The applicant shall record the following when processing or packaging/repackaging certified marine products. In addition, when mixing certified marine products and non-certified products and selling the resulting certified marine products as "certified marine products," or applying the logo mark, the applicant must ensure that the certified marine products in question do meet the requirements in the "Detailed Rules for the Mixtures of Certified Marine Products and Uncertified Ingredients" stipulated separately as Appendix 1 of the "Regulations for the Use and Management of Logo".
  1. Date of processing or packaging/repackaging
  2. Details of processing or packaging/repackaging work
  3. Weight before processing or packaging/repackaging
  4. Weight after processing or packaging/repackaging
- 3.5. The applicant shall have in place a traceability system that enables the following, at all stages.
  1. It is possible to trace from shipping slips the products sold by the applicant as certified seafood products at all stages of their management system.
  2. It is possible to check that the products sold by the applicant as certified marine products are separated at all stages.
  3. When the applicant sells products that include certified marine products and non-certified products mixed in processing stages as certified marine products, it is possible to check that the certified marine products in question do meet the requirements stipulated in the "Detailed Rules for the Mixtures of Certified Marine Products and Uncertified Ingredients".
  4. The applicant shall be able to present accurate, complete, and unaltered records concerning traceability upon request from consumers, shipment recipients, Certification Body, or MEL Council.
- 3.6. After acquiring certification, the applicant shall provide the following information to the recipients of shipments of the certified marine products.
  1. The applicant's own CoC Certification status
  2. Shipment date
  3. Shipment weight

#### **4 Requirements for logo management**

- 4.1. When using a logo mark, the applicant shall have a logo management system in place based on the "Regulations for the Use and Management of Logo" separately stipulated.

## **Appendix 1. Internal audits and corrective action for non-conformities**

This appendix sets forth requirements for internal audits and non-conformities, for which applicants shall have a system in place.

### **1. Requirements for internal audits**

- 1.1.** Applicants shall have at least one or more internal auditors to ensure the proper implementation of the CoC. The same individual may not assume both the manager and internal auditor roles.
- 1.2.** The applicant shall have a written procedure for conducting internal audits. The procedure shall include the following:
  - Inspection of balance between purchasing weight and shipping weight of certified seafood products (mass balance): Comparing the balance of weight of shipped certified seafood products and purchased certified seafood products, and verifying any reasonably explainable errors
  - Traceability test: Checking whether certified seafood products can be traced at all stages from random shipment records to the original certified fishery and aquaculture
  - Recall procedure test
- 1.3.** The applicant shall have audits carried out by the internal auditor on a regular basis, at intervals not exceeding one year. In addition, the audit record shall be kept until the next audit is conducted.

### **2. Requirements for corrective action**

- 2.1.** If non-conformities are found during an internal audit, the internal auditor shall record at least the following items and notify the manager:
  1. Date and time when the non-conformity occurred
  2. Details and cause of the non-conformity
  3. Identification of the personnel involved in the non-conformity
- 2.2.** The manager shall take immediate action against non-conformities by swiftly formulating corrective procedures that include steps for carrying out corrective measures and a timeline for completion, and reporting the results of corrective measures to the internal auditor. The report shall include the following:
  1. Corrective measures to prevent recurrence
  2. A timeline for completing corrective measures
  3. The actual date that corrective measures were completed

## Appendix 2 Additional requirements for multi-site applicants

This appendix stipulates the eligibility of multi-site applicants and the requirements for management systems of multi-site applicants.

### 1. Eligibility requirements for multi-site applicants

1.1. A multi-site applicant shall meet one of the following requirements:

1. An organization that operates with franchises or companies having multiple branches, stores, processing sites, or distribution centers linked through common ownership, management, or other organizational links
2. A group of independent legal enterprises established and functioning for the purpose of CoC Certification (producer group)
3. An organization that has subcontracted more than one entity to process its certified seafood product

1.2. A multi-site applicant shall be categorized as type A, type B, or type C. The multi-site applicant shall comply with the following requirements depending on the category.

1.2.1. **Type A multi-site applicant:** A type A multi-site applicant shall conform to the following requirements:

1. All sites shall be contracted with the entity located in the central office.
2. All sites shall have a common management system, specified in writing, for segregation, traceability, and logo management.
3. All sites shall be managed and internally audited by the central office.

1.2.2. **Type B multi-site applicant:** A type B multi-site applicant shall conform to the following requirements:

1. All sites shall be contracted with the entity located in the central office.
2. The central office shall ensure that all sites comply with the requirements of segregation, traceability, and logo management stipulated in the MEL CoC Standard through internal audits and auditing by the Certification Body.

1.2.3. **Type C multi-site applicant:** A type C multi-site applicant shall conform to the following requirements:

1. The multi-site applicant shall sell and/or serve the certified seafood products exclusively or primarily to end consumers. (Other entities selling to retailers or wholesalers may not apply as type C multi-site applicant.)
2. All sites shall be owned by the entity of the central office or be contracted with the entity of the central office.
3. All sites shall have a common management system, specified in writing, for segregation, traceability, and logo management.



4. All certified seafood products dealt with at the sites shall be purchased by the central office.
5. If the central office utilizes one or more subcontractors, the central office shall contract with the subcontractor and ensure that the subcontractor enforces the common management system, specified in writing, for segregation, traceability, and logo management.
6. The central office shall ensure that all sites comply with the requirements of segregation, traceability, and logo management stipulated in the MEL CoC Standard through internal audits and auditing by the Certification Body.

## **2. Requirements for the management system of a Type A multi-site applicant**

### **2.1. Requirements for the central office**

- 2.1.1.** The multi-site applicant shall establish a central office that includes at least two staff members, a manager and an internal auditor, to supervise all sites.
- 2.1.2.** The manager shall establish a management system that complies with the requirements stipulated in the MEL CoC Standard, section 2.1, and that is applicable to all sites.
- 2.1.3.** The manager shall define procedures for the CoC and ensure that all sites comply with the requirements for segregation, traceability (section 3), and logo management (section 4) in the MEL CoC Standard. If deemed necessary, the manager shall conduct training for the site managers.
- 2.1.4.** The central office shall keep the contracts and a directory of all sites in the scope of certification. The directory shall include the following items:
  1. Name of the site
  2. Address
  3. Contact details
  4. Name of the certified seafood products
  5. Date of last internal audit and results
- 2.1.5.** The internal auditor shall establish a procedure that is applicable to all sites for conducting internal audits and implementing corrective actions in accordance with the requirements defined in Appendix 1.
- 2.1.6.** The internal auditor shall include in the procedure the following items in addition to the requirements set out in section 1.2 of Appendix 1.
  - Schedules for the annual audits of all sites in the scope of CoC Certification
  - Procedures for conducting audits of potential new sites before officially adding them to the CoC Certification scope
- 2.1.7.** The manager shall take immediate action against non-conformities by swiftly formulating corrective

procedures. If a non-conformity is identified in one site, the manager shall consider the possibility of non-conformities in other sites or any negative impacts on other sites. If there is a possibility of non-conformities in other sites, managers shall implement corrective actions throughout the sites. The internal auditor shall confirm the completion of all corrective actions.

**2.1.8.** The central office shall inform the Certification Body when there are any changes stipulated in 2.2.1 of the MEL CoC Standard. The central office shall request approval of the Certification Body whenever it makes changes stipulated in 2.2.2 of the MEL CoC Standard.

**2.1.9.** The central office shall inform the Certification Body within ten business days if it adds a new site to its CoC Certification scope. The central office shall ensure that the new site implements a common management system for segregation, traceability, and logo management through internal audits and auditing by the Certification Body, and that there are no serious non-conformities with requirements for CoC Certification. The central office shall inform the Certification Body within ten business days if it deletes any existing site from its CoC Certification scope.

## **2.2. Requirements for the site**

**2.2.1.** The site shall implement a CoC and appoint at least one site manager who communicates with the central office.

**2.2.2.** The site manager shall implement and maintain segregation, traceability, and logo management under the supervision of the manager of the central office.

**2.2.3.** If a non-conformity is detected by internal audit, the site manager shall implement corrective actions with the manager of the central office in accordance with the procedure stipulated in Appendix 1.

## **3. Requirements for the management system of a Type B multi-site applicant**

### **3.1. Requirements for the central office**

**3.1.1.** Type B multi-site applicants shall establish a central office that includes at least one internal auditor to supervise all sites.

**3.1.2.** The central office shall enter into contracts with all sites handling certified seafood products and ensure that all sites comply with the requirements for segregation, traceability (section 3), and logo management (section 4) as per the MEL CoC Standard. The contract shall include the following conditions:

1. The site shall implement a system in compliance with the requirements for segregation, traceability (section 3), and logo management (section 4) of the MEL CoC Standard.
2. The site shall allow access to its facilities and records related to the certified seafood product to

the Certification Body or MEL Council upon request

- 3.1.3.** The central office shall keep the contracts and a directory of all sites in the scope of Certification. The directory shall include the following items:
1. Name of the site
  2. Address
  3. Contact details
  4. Name of the certified seafood products
  5. Date of last internal audit and results
- 3.1.4.** The central office shall inform sites that do not obtain MEL CoC Certification that they are required to undergo a field audit by the Certification Body to ensure they meet the requirements of the MEL CoC Standard.
- 3.1.5.** The central office shall keep the following records related to the site:
1. Stocking weight and product details
  2. Shipping weight and product details
  3. Stocking date and shipping date
- 3.1.6.** The internal auditor shall establish a procedure for conducting internal audits and implementing corrective actions in accordance with the requirements stated in Appendix 1.
- 3.1.7.** The internal auditor shall include in the procedure the following items in addition to the requirements set out in section 1.2 of Appendix 1:
- Schedules for the audits of all sites in the scope of CoC Certification
  - Procedures for conducting audits of potential new sites before officially adding them to the CoC Certification scope
- 3.1.8.** The central office shall inform the Certification Body when there are any changes stipulated in 2.2.1 of the MEL CoC Standard. The central office shall request approval of the Certification Body whenever it makes changes stipulated in 2.2.2 of the MEL CoC Standard.
- 3.1.9.** The central office shall inform the Certification Body within ten business days if it adds a new site to the CoC Certification scope. The central office shall ensure that the new site implements a common management system for segregation, traceability, and logo management through internal audits and auditing by the Certification Body, and that there are no serious non-conformities with requirements for CoC Certification. The central office shall inform the Certification Body within ten business days if it

deletes any existing site from the CoC Certification scope.

### **3.2. Requirements for the site**

- 3.2.1.** The site shall document the procedure relating to its CoC meeting the requirements for segregation, traceability (section 3), and logo management (section 4) as per the MEL CoC Standard. This document shall include the following:
- Organizational structure, responsibilities, and authority of the CoC
  - Procedures for meeting the requirements stipulated in sections 3 and 4 of the MEL CoC Standard, and a flowchart of certified fishery product movement in the supply chain
- 3.2.2.** The site shall appoint a site manager to supervise the CoC procedure and communicate with the central office.
- 3.2.3.** The site manager shall implement and maintain segregation, traceability, and logo management.
- 3.2.4.** If a non-conformity is detected, the site manager shall implement corrective actions with the manager of the central office in accordance with the procedure stipulated in Appendix 2. The internal auditor shall confirm the completion of all corrective actions.

## **4. Requirements for the management system of a Type C multi-site applicant**

### **4.1. Requirements for the central office**

- 4.1.1.** A multi-site applicant shall establish a central office that includes at least two staff members, a manager and an internal auditor, to supervise all sites.
- 4.1.2.** The manager shall establish a management system that complies with the requirements defined in the MEL CoC standard, section 2.1, and is applicable to all sites. The central office shall maintain records of each site for a minimum period of 18 months, made available upon request.
- 4.1.3.** The manager shall provide the procedures for the CoC and ensure that all sites comply with the requirements for segregation, traceability (section 3, except for 3.6), and logo management (section 4) as per the MEL CoC Standard.
- 4.1.4.** The central office shall keep the contracts and a directory of all sites. The directory shall include the following items:
1. Name of the site
  2. Address
  3. Name of the site supervisor

- 4.1.5.** The internal auditor shall establish a procedure that is applicable to all sites for conducting internal audits and implementing corrective actions in accordance with the requirements defined in Appendix 1.
- 4.1.6.** The internal auditor shall include in the procedure the following items in addition to the requirements set out in section 1.2 of Appendix 1.
- Schedules for the annual audits of all sites in the scope of CoC Certification
  - Procedures for conducting audits of potential new sites before officially adding them to the CoC Certification scope
- 4.1.7.** If a non-conformity is detected, the manager shall implement corrective actions with the site supervisor. If the non-conformity is identified in one site, the manager shall consider the possibility of non-conformities in other sites or any negative impacts on other sites. If there is a possibility of non-conformities in other sites, managers shall implement corrective actions throughout the sites. The internal auditor shall confirm the completion of all corrective actions.
- 4.1.8.** The central office shall inform the Certification Body when there are any changes stipulated in 2.2.1 of the MEL CoC Standard. The central office shall request approval of the Certification Body whenever it makes changes stipulated in 2.2.2 of the MEL CoC Standard.
- 4.1.9.** If there is at least a 50 percent increase or decrease in number of sites, the central office shall notify the Certification Body of any changes. The central office shall ensure through internal audits and auditing by the Certification Body that the new site implements the common management system for segregation, traceability, and logo management and that there are no serious non-conformities with requirements for CoC Certification.
- 4.1.10.** The central office or each site shall assign a site supervisor to supervise implementation of segregation, traceability, and logo management at each site. If appointed by the central office, the site supervisor can also serve for a maximum of ten sites.
- 4.1.11.** If a non-conformity is detected, the site manager shall implement corrective actions with the manager of the central office in accordance with the procedure stipulated in Appendix 2. The internal auditor shall confirm the completion of all corrective actions.

## **4.2. Requirements for each site**

- 4.2.1.** Each site shall implement and maintain segregation, traceability, and logo management at their site, following the instructions of the site supervisor.

## Notes

Date of enactment: October 3, 2017

Date of effect: February 1, 2018

Transition period : Three years until January 31, 2021

This standard shall come into effect as of February 1, 2018.

The certified entities with MEL CoC Certification ver.1.0 shall undergo an assessment to be certified with MEL CoC Standard ver.2.0 during the transition period.