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Draft

Chain of Custody Standard

Version 3.0 (tentative)



MEL Council
2 0 2 6

Introduction

This document sets out the criteria for Marine Eco-Label Japan (hereinafter referred to as "MEL") Chain of Custody (CoC) certification, based on the standards and certification scheme established by the Marine Eco-Label Japan Council (hereinafter referred to as "Council"), to ensure that certified products sold are produced from seafood products that comply with the Marine Eco-Label Japan (hereinafter referred to as "MEL") production-level certification standards at all stages of distribution and processing up to the point of reaching the consumer.

To obtain the CoC certification issued by the Council, it is necessary to satisfy the criteria set out in this standard. The certified businesses that this standard envisions are processors, distributors, retailers, food service providers, etc., and all businesses involved in the entire process from procuring certified seafood products from certified producers to consumers must take responsibility for establishing a system that complies with this standard.

This standard applies the principles listed in 1~4 below.

Principle 1: Social Qualifications and Responsibilities of the Applicant

Principle 2: Seafood Identification, Proper sorting and Traceability

Principle 3: Internal Audit and Corrective Actions

Principle 4: Multi-site Requirements

Certification standards and specific criteria are established under each principle. Applicants who meet these standards are recognized as businesses conforming to this standard. Separate "Guidelines for Auditors; Indicators of Conformity" outlines evaluation indicators for determining compliance with the criteria.

Certification based on this standard is carried out by an independent third-party organization (certification body) that has been accredited to conform to the ISO standard (ISO/IEC 17065:2012) defining the capabilities and competence of certification bodies. The accreditation of such organizations is carried out by member organizations of the IAF (International Accreditation Forum).

This standard is valid in both Japanese and English. Furthermore, to maintain the validity and effectiveness of this standard, it will be reviewed at least once every five years from its formal entry into force, and revised as necessary. Reviews will also be conducted and responses will be made when the FAO Code of Conduct, the Fisheries Ecolabel Guidelines, the GSSI Benchmarking Tool, or relevant Japanese government laws and regulations are revised.

Revision of the MEL Chain of Custody Standard to Version 3.0

The MEL Chain of Custody (CoC) Standard, Version 2.0, was established in 2017. At the time, the concept of "Chain of Custody" was not widespread in Japan, and the standard was developed by modeling it after CoC certification standards from overseas certification schemes.

The Operational Management Regulation for Marine Eco-Label Japan Council stipulates that the standards should be reviewed at least once every five years to ensure its validity and effectiveness. Since the enactment of the previous standard, there has been a growing awareness of SDGs in society, and consumer expectations for sustainable use of seafood resources and fisheries and aquaculture that consider the conservation of the environment and ecosystems have increased. Simultaneously, the importance of building a system to appropriately provide such certified seafood products to consumers through a trusted supply chain has also increased.

Furthermore, due to the enactment of Act on Ensuring the Proper Domestic Distribution and Importation of Specified Aquatic Animals and Plants, amendments to the Wholesale Market Act, and amendments to the Food Sanitation Act, seafood processors, wholesalers, retailers, and restaurants are now strongly required to ensure transparency and accuracy in seafood distribution, adherence to compliance, and hygiene management in accordance with international standards. Furthermore, the global demand for seafood is increasing, leading to soaring international prices for seafood. In addition, unstable international exchange rates and the movement towards mandatory disclosure of carbon footprints are also factors that cannot be ignored.

Japan boasts one of the world's largest production volumes of seafood, encompassing production, processing, and consumption. When imported seafood is included, it is one of the world's largest consumers of seafood. Its diverse fish species, fishing methods, and processing techniques are rooted in regional traditions and food culture. Supporting this is a multi-layered yet efficiently functioning distribution system, including the distribution of fresh and live fish, and technologies for maintaining freshness and quality. Japan possesses a seafood supply chain that the world can be proud of. However, the existing CoC Standard has not fully reflected these domestic realities, leading to strong calls for improvement from certified businesses and stakeholders. This has resulted in a lack of awareness and widespread adoption of MEL certification or the seafood certification system itself.

In response to this situation, MEL has decided to revise its CoC Standard. Incorporating globally recognized perspectives on corporate social responsibility and the protection of human and labor rights, we have revised criteria that were excessively burdensome to businesses and on-site workers or did not reflect the realities of

distribution and processing. Furthermore, given that the revised Food Sanitation Act mandates hygiene management incorporating the HACCP concept, we have revised the assessment items and requirements for businesses that have obtained food hygiene and food safety certifications.

MEL aims to further promote the widespread use of sustainable domestic seafood, and we hope that this revision will play a role in achieving that goal. We also hope that it will contribute to improving the challenges surrounding the fisheries industry, such as the recovery of Japan's fisheries resources and the expansion of seafood consumption.

About the criteria for determining conformity (Guidelines for Auditors)

The MEL Chain of Custody Standard Version 3.0 is a standard comprised of certification standards and criteria that cover the entire supply chain, based on the four principles described above. As mentioned above, the "Guidelines for Auditors; Indicators of Conformity" of this standard sets evaluation indicators for determining conformity. Furthermore, the "Guidelines for Auditors" is divided into three volumes—"Wholesale," "Processing Plant," and "Retail"—to ensure appropriate and efficient assessments tailored to the specific circumstances of businesses seeking certification. Each section consists of criteria, evaluation indicators, and annexes appropriate to the target business type.

1. Wholesale:

This volume targets wholesalers, intermediate wholesalers, or trading companies that procure certified seafood products but do not process them, instead engaging solely in the distribution process, including sorting, storage, trading (auction/negotiated sales), and shipping. From an identification and sorting perspective, appropriate record-keeping and data management, as well as management systems for light processing such as packaging and repackaging, are required.

2. Processing Plant:

This volume targets businesses that procure certified seafood product raw materials, process them themselves, and produce certified products. Because the physical properties of seafood change before and after processing, thorough identification, sorting, and traceability are required. This includes not only seafood processing facilities, but also vendors and prepared food factories that cook, process, and sell seafood for the ready-to-eat food market.

3. Retail:

This volume targets businesses that cook, process, provide, or sell certified seafood products to end consumers. Examples of retail businesses include mass retailers and fish shops with fresh fish sections or prepared food areas, hotels, restaurants, and contract food services (catering providers that operate employee cafeterias, hospitals, public institutions, schools, etc.).

The assessment will be conducted using one of the three volumes of Guidelines for Auditors, depending on the type of business. However, in cases where a business does not fit into a single Guidelines for Auditors, the certification body will proceed with the

assessment by combining appropriate requirements with the approval of the council.

References

- Marine Eco-Label Japan Council Fisheries Management Standard and Aquaculture Management Standard
- Marine Eco-Label Japan Council Logo Mark Usage and Management Regulations
- ISO 9001:2015 Quality Management System - Requirements
- ISO/IEC 17065:2012 Conformity assessment - Requirements for bodies certifying products, processes and services
- ISO/IEC 17067:2013 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
- FAO Technical Guidelines on Aquaculture Certification
- GSSI Global Benchmark Tool
- Japan Food Certification Organization HACCP Standard for Processing Fisheries Production

*Please refer to the latest version of the cited standards for ISO, ISO/IEC.

Certification Subjects, Certification Categories, and Scope of Certification

1. Certification Subjects

The certification under this standard applies to wholesale businesses, seafood processing businesses, retail businesses, and food service businesses that have obtained business licenses in accordance with the Food Sanitation Act. If a business does not have an applicable business license, the contents of the business notification submitted to the local government, etc., and the articles of incorporation will be checked to confirm eligibility for certification.

Furthermore, business operations are divided into storage, packaging/repackaging,

wholesale, retail, and food service, and processing is divided into primary processing, secondary processing, advanced processing, and final processing.

Businesses that transport, store, or sell certified seafood products without opening the packaged products are not necessarily subject to CoC certification.

2. Certification Categories

The certification categories under this standard are as follows, based on the site configuration and the relationship between the headquarters and each site:

(1) Single site

Businesses with one site handling certified seafood products.

(2) Multi-site A

Businesses with multiple sites handling certified seafood products, where the certification representative (headquarters) and each site belong to the same organizational entity.

(3) Multi-site B

There are multiple sites handling certified seafood products, and the certification representative (headquarters) and each site are businesses with which the business is contracted.

3. Scope of Certification

The scope of certification in this standard is determined by the certified fish species handled (target fish species), the applicant's business type as defined in the certification subjects (distribution/processing classification), the certification categories, and its structure.

4. Structure of Certification (Business Operator or Business Entity)

The structure of certification in this standard is the entity seeking certification, as indicated by the business name or the businesses, organizations, and contractors of the multi-site.

For the above definitions and details, please refer to the criteria for determining conformity (Guidelines for Auditors).

Definition of Terms

Chain of Custody : (CoC)	This standard refers to a mechanism to ensure that seafood with the logo marked on the market is a seafood supplied through production-stage certification (certified seafood products) (Chain of Custody from FAO Guidelines for the Ecolabelling of Fish and Fishery Products from Marine Capture Fisheries and the FAO Technical Guidelines on Aquaculture Certification). In this standard, CoC is used as an abbreviation for this term.
Certification:	It refers to MEL certification.
Applicants:	In this standard, businesses that have applied for CoC certification include businesses that have obtained certification that are applying for new CoC certification.
Packing and Repacking:	Do not make any changes to the certified seafood product itself, but change the packing of the certified seafood product.
All stages:	All operations or processes of purchasing, storing, processing, packing, repacking, and shipping (or cooking and serving) certified seafood products directly related to the site.
Identification:	Distinguish between certified and non-certified seafood products.
Sorting:	Handle certified seafood products separately so that they do not mix or mix with non-certified seafood products.
Traceability:	A system that allows accurate search and reference of records related to the manufacture, shipping, sale, and food and beverage services of certified seafood products
Headquarters:	CoC certification representative or multi-site organizer
Site:	A place identified by a single address that physically handles certified seafood products and where it actually purchases, stores, processes, packs and repacks, ships, sells, or cooks or serves it in the course of its operations or processes.
Contractor:	All businesses that have signed a contract with the applicant and handle certified seafood products. However, businesses that distribute, store, and sell packaged seafood without opening it are not necessarily included in this category.
Internal Audit:	Applicants must confirm and evaluate that the CoC is in accordance with procedures and regulations. The performer is called an internal auditor. Objectivity equivalent to external review is required.

Principles, certification standards and criteria related to certification

Principle 1: Social Qualifications and Responsibilities of the Applicant

Certification Standard 1.1 Compliance with relevant laws and regulations related to the distribution, processing, and food and beverage industry of seafood products, as well as ordinances established by the local government where the applicant is located.

Criteria

- 1.1.1 The applicant must comply with relevant national laws, including when dealing with certified and non-certified seafood products.
- 1.1.2 The applicant is a business operator that legally handles seafood products under the necessary license or permit, has been issued a business license by the competent public health authority, and the location, responsible person, and equipment of the business establishment must be in place. If you are overseas, you must comply with the relevant laws and regulations of the country.
- 1.1.3 Employees and workers are provided with wages, working conditions, and benefits in accordance with relevant laws and regulations, etc., and the working environment is secured and health management is appropriately implemented.
- 1.1.4 No illegal labor such as child labor is performed.

Certification Standard 1.2 Have a mechanism to manage and operate CoC certification.

Criteria

- 1.2.1 The applicant must ensure that the most recent supplier(s) has/have obtained production stage certification or CoC certification.
- 1.2.2 The applicant must have at least one management officer who will manage all processes of handling certified seafood products and supervise the traceability and sorting to ensure that they are in place and recorded.
- 1.2.3 The applicant must clarify the organizational structure, responsibilities and authority for the management and operation of the CoC.
- 1.2.4 The applicant must keep records of all stages of the certified seafood products in a presentable state for at least three years, which is the validity period of the CoC certification. In addition, if the shelf life (expiration date, etc.) of the shipped certified seafood product exceeds 3 years, they must be stored in a way that can be presented during the shelf life of the seafood in question. However, eligible

applicants for retail must keep records of all stages of certified seafood products in a presentable way for at least 18 months.

- 1.2.5 The applicant must have documented procedures for receiving and handling complaints or opinions from consumers or shippers regarding certified seafood products. In addition, a complaint handling system must be in place based on the relevant procedures.
- 1.2.6 The applicant must have documented the procedures for conducting the recall. In addition, the applicant must establish a recall system based on the relevant procedures, and if seafood products that do not meet the requirements of certification are found, the seafood products must be recalled in accordance with this procedure. In addition, matters related to the CoC may be attached to the recall response system that the applicant has already formulated.
- 1.2.7 The applicant shall provide and implement opportunities to educate employees and stakeholders on the social responsibility of handling certified seafood products and the management and operation of the CoC.
- 1.2.8 The applicant must undergo a risk assessment of the CoC during the preparation stage for the audit.
- 1.2.9 The Applicant must have a system in place to use and manage the Logo Mark in accordance with the "Logo Mark Usage and Management Regulations" separately stipulated.

Certification Standard 1.3 Requirements for Changing CoC Certification

Criteria

- 1.3.1. The applicant must notify the certification body in writing or electronic media within 30 business days from the date of change in the event of purchasing certified seafood products from a business that has obtained a new certification, or if a new certified seafood product is purchased.
- 1.3.2. Businesses that have obtained certification must obtain written approval from the certification body before making any of the following changes: If the certification body deems it necessary, a separate audit will be conducted.
 - (1) When performing new operations that are not included in the scope of certification for certified seafood products.
 - (2) When outsourcing the work of handling certified seafood products to a new contractor.
- 1.3.3 The applicant must notify the certification body if the business included in the scope of certification ceases.

Principle 2: Identification, Proper Sorting and Traceability of Seafood Products

Certification Standard 2.1 Certified seafood products must have a system in place to identify them.

Criteria

- 2.1.1 The applicant must have a system in place to identify certified seafood products at all stages. It is desirable to display it on packaging materials, packaging containers, packaging stickers or labels, or on storage area signs.
- 2.1.2 The certified seafood products must be able to be identified as certified on the shipping document, shipping statement or corresponding logistical documents. In addition, if all shipped seafood products are subject to certification, it will not be applied.
- 2.1.3 Information on certified seafood and products used on packages, labels, menus, etc. must be accurate.

Certification Standard 2.2 Classification of certified seafood products at all stages is established, and a system is in place to control its implementation.

Criteria

- 2.2.1 The applicant must have a system in place within the organization that is well known and properly classified at all stages, and operates it accurately.
- 2.2.2 During the processing and cooking stage, if certified and non-certified seafood products of the same species are mixed, they must not be sold as certified aquatic products. In addition, in the case of mixing with other fish species, if the certified seafood product is 95% or more, it can be considered certified. If it is less than that, the name of the fish species certified and the mixing percentage of the certified seafood must be indicated. In addition, if certified and uncertified seafood in the product ultimately provided to the consumer can be distinguished visually or physically, it does not constitute mixing.

Certification Standard 2.3 Traceability of certified seafood products at all stages is established, and a system is in place to manage its implementation.

Criteria

- 2.3.1 The applicant must have a system in place to verify that the certified seafood products purchased were supplied by a certified production-stage certified business or businesses and have been processed and distributed only by a CoC

certified business or businesses. The system must include the prescribed requirements.

- 2.3.2 The applicant must record the prescribed requirements when processing, cooking, transporting, sorting, packing, repacking, or selling certified seafood products.
- 2.3.3 The applicant must be able to trace the certified seafood products sold at all stages of the applicant's organization, traceable from the shipping document. However, applicants eligible for retail use must be able to confirm the purchase information of certified seafood processed, cooked, or sold.
- 2.3.4 The applicant must have a schedule of the process from the purchase of certified seafood to processing, cooking, manufacturing, transportation, sorting, packing, repacking, sales, etc., and shipping.
- 2.3.5 When using certified seafood and selling it as a certified product, the applicant must have prepared a product specification for the product and processed or manufactured it based on it.
- 2.3.6 The applicant must be able to provide accurate records of traceability if requested by consumers, ship-to/sell destinations, certification bodies and MEL councils.

Principle 3: Internal Audit and Corrective Actions

Certification Standard 3.1 Have an internal audit system to appropriately manage and operate the CoC. However, this is not the case in the case of a single site.

Criteria

- 3.1.1 The applicant must have at least one internal auditor to audit the implementation of the CoC to ensure that it is being implemented. The internal auditor and the person in charge of management must be different.
- 3.1.2 The applicant must have documented procedures for conducting an internal audit. The document must include the prescribed matters.
- 3.1.3 The applicant shall conduct periodic internal audits by internal auditors to the extent that the validity period of the certification does not exceed and keep the records of them appropriately.

Certification Standard 3.2 Internal audit mechanism for corrective actions must be in place.

Criteria

- 3.2.1 If non-conformities are discovered through an internal audit, the internal auditor must notify the management officer of the contents.
- 3.2.2 The person in charge of management must prepare corrective procedures for the non-conformities pointed out, take prompt action, and report the results of the corrective actions to the internal auditor. The internal auditor must also confirm the completion of corrective actions.

Principle 4. Multi-site Requirements

Certification Standard 4.1 If the certification category is multi-site, you must have an eligible qualification.

Criteria

- 4.1.1 Multi-site applicants must meet the prescribed requirements and be classified.
- 4.1.2 The applicant for Multi-site A must meet the prescribed requirements.
- 4.1.3 Applicants for Multi-site B must meet the prescribed requirements.

Certification Standard 4.2 If the certification category is multi-site, the headquarters must have an appropriate CoC management system.

Criteria

- 4.2.1 The multi-site applicant must have a headquarters consisting of at least two i.e., one administrative officer who oversees all sites and one internal auditor.
- 4.2.2 The administrator shall be responsible for the "Principle 1: Social Qualifications and Responsibilities of the Applicant" must have been established.
- 4.2.3 The management manager must provide the CoC procedure or manual to all sites and have a system in place to meet the requirements of "Principle 2: Identification, Proper Sorting and Traceability of Seafood Products" in the main text of this standard. In addition, if deemed necessary, appropriate training must be provided to site administrators.
- 4.2.4 The person in charge of management must have a system for deepening understanding of the use of logos on all sites and ensure that it is implemented.
- 4.2.5 The headquarters shall create and manage a list (register) of all sites included in the scope of certification. The list (register) must contain the prescribed five items.
- 4.2.6 The internal auditor must establish a system for conducting internal audits and corrective actions that are applicable to all sites and comply with the requirements of "Principle 3: Internal Audit and Corrective Actions".
- 4.2.7 The internal auditor must include the following in addition to the matters specified in "Principle 3: Internal Audit and Corrective Actions" in the internal audit procedure.
 - (1) Schedule of regular internal audits of all sites included in the scope of certification
 - (2) If the headquarters adds a site or expand the scope of authentication, check the CoC procedure for the new site in advance.
- 4.2.8 If non-conformities are found during an internal audit, the person in charge of

management must take corrective action together with the site administrator of the site.

In addition, if non-conformity is found at one site, the administrator must investigate whether there is an impact of the non-conformity on the other sites. If it is determined that all sites are affected, corrective action must be taken at all sites.

The internal auditor must confirm the completion of the corrective action.

4.2.9 The headquarters shall notify the certification body of any changes specified in Criterion 1.3.1 that occur at any of the sites.

In addition, if the changes specified in Criterion 1.3.2 of the main text of this standard are made at any site, approval must be obtained from the certification body in advance.

4.2.10 If a new site is added to the Certification Configuration, the headquarters must notify the certification body within 10 working days of registration.

The headquarters must ensure that the newly registered site operates a management system for sorting, traceability and logo marking that is common to the applicant or existing sites, and that there is no essential non-compliance with the requirements of the CoC certification.

In addition, if the registered site(s) is/are deleted, the headquarters must notify the certification body to that effect within 10 business days after the deletion.

4.2.11 (For Multi-site B headquarters only)

The headquarters has signed a consignment agreement with all sites that handle certified seafood products, and must include two prescribed items.

4.2.12 (For Multi-site B headquarters only)

The headquarters must keep records including the prescribed three items regarding certified seafood products that have been processed, transported, sorted, packed, repacked, sold, etc. at the site. However, the headquarters subject to retail use must maintain records containing the prescribed two items regarding certified seafood processed and cooked at the sites.

Certification Standard 4.3 If the certification category is multi-site, each site must have an appropriate CoC management system. (Common requirements for Multi-sites A and B)

Criteria

4.3.1 Each site must have a site administrator who conducts an in-site CoC and communicates with headquarters. The number of sites in charge of the site management may be more than one, but the method of determination must be

reasonable.

4.3.2 The site administrator shall carry out and maintain the management of sorting, traceability and logs on the site in accordance with the instructions of the headquarters administrator.

4.3.3 If any non-conformities are discovered during an internal audit, the site administrator must take corrective actions in accordance with the procedures set forth in Principle 3 together with the head office. The internal auditor must confirm the completion of corrective actions.

4.3.4 (Multi-site B Sites Only)

Each site must understand and maintain the CoC procedure or manual set forth in criterion 4.2.3 of this standard.

Notes

Date of enactment: The date of enactment of this standard is October 3, 2017.

Effective date: The effective date of this standard is February 1, 2018.

Revision date: The revision date of this standard is June 25, 2025.

Revision date: The revision date of this standard is 2026 ●●month●●●day.

Transition period: Businesses that have obtained MEL Distribution Processing Stage (CoC) certification Ver. 2.0 shall transition to Ver. 2.0, and the transition period shall be three years after the entry into force of this standard (until the date of the month of 2029).