

Subject: Requirements for all CoC clients

7.1 Requirements for all CoC clients

- 7.1.1 The CAB shall plan on-site and off-site audit activities and duration, taking account of:
- The proposed or actual scope.
 - The management system used by the client.
 - The CoC Standard the client will be audited against.
 - The need to allow sufficient time to verify the effectiveness of the client's management system for the proposed scope.
 - Visits to non-certified subcontractors as per Section 8.4.
 - Any other certifications held.
 - Opportunities to synchronize and combine CoC audits with other audits where possible and appropriate.
- 7.1.2 The CAB shall determine the number and type of sites to be audited as follows:
- For single and multi-site certificates, every site shall be audited.
 - For CoC CFO Certificates, sites shall be audited as per Section 7.2.
 - For CoC Group certificates, sites shall be audited as per Section 10.4.
- 7.1.3 CABs shall plan an audit duration of at least 1.5 days on-site for single and multi-site clients that meet all the following criteria:
- Include processing or contract processing in their scope as per Table 4.
 - Are located in a country with a score below 41 in Transparency International's latest Corruption Perception Index (cpi.transparency.org).
 - Handle both certified and non-certified seafood.
 - Purchase more than 5,000 MT of seafood annually, or more than 20 seafood batches annually.

Guidance 7.1.3

The purpose of setting minimum audit duration is to ensure there is sufficient time for the auditor to successfully evaluate all relevant activities described in Section 8.2. The 1.5 days equates to 12 working hours for 1 auditor per site that meets the eligibility in 7.1.3. The minimum 1.5 days on-site audit duration does not include time taken to visit non-certified subcontractors or completing the audit checklist off-site. In cases where a multi-site certificate also has a trading office this clause would not apply to the trading office. In specific cases where it is necessary to complete a part of the processing site audit at the trading office (i.e. to obtain input/output records as per Guidance 8.2), the time needed for this can be considered inclusive of the 1.5 days.

7.1.3.d still applies if an organization handles only 100 MT annually in 21 batches or if the organization handles 6,000 MT in 1 batch. This total includes all seafood, not only certified Products.



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- 7.1.4 The decision and rationale for the audit duration for clients meeting 7.1.3 shall be recorded in the audit checklist.
- 7.1.5 If an audit is planned for 1.5 days based on the criteria in 7.1.3, but is completed in less time, the CAB shall document the rationale for this in the audit checklist.
- 7.1.6 The CAB shall ensure that audits are carried out on-site, except for cases described in 7.1.6.1 and 11.3.3.
- 7.1.6.1 Clients are eligible to become certified through a remote certification audit, provided they do not carry out any activities with respect to certified products other than trading (buying and/or selling) as defined in Table 4, unless:
- a. Scope activities other than trading (buying/or and selling) apply only to activities carried out by their subcontractors and assessed under Section 8.4.

Guidance 7.1.6.1

A Trading operation or site within a multi-site certificate which meets these criteria could also be audited remotely. Eligibility is not limited by the activities of subcontractors, as subcontractor auditing is covered within Section 8.4. CABs may refer to the guidance in ISO 19011 to determine whether a remote audit is feasible in each case, considering for example: ability to interview, access relevant records, and other risk factors they are aware of and/or are evaluated in the application.

This requirement also applies to re-certification audits.

- 7.1.6.2 If the criteria in 7.1.6.1 are met by the client but an on-site audit is still planned, the CAB shall document their rationale in the audit checklist.
- a. This should be based on factors not identified in 7.1.6.1 that increase the client's risk profile.
- 7.1.7 The CAB shall verify if the client holds other accredited certifications issued by an accredited CAB to a relevant nationally- or internationally-recognized standard.
- 7.1.7.1 If the client does hold accredited certifications, the CAB may use this as a substantive indication of conformity with relevant elements of the CoC Standard by:
- a. Requesting the most recent audit report from the client.
 - b. Undertaking a gap analysis of the differences between the CoC Standard and the other standard.
 - c. Using knowledge of conformity demonstrated by the other certification to support the CAB's audit and certification decision.



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Guidance 7.1.7.1

This allows the CAB to use the results of assessments conducted for other certification schemes and/or to combine the MSC audit with another audit when elements of the CoC Standard are covered in other standards or certification requirements.

- 7.1.8 The CAB shall use Table 5 and Table 6 to verify the country lab our risk level of the client, for each of their sites and subcontractors.
- 7.1.9 The CAB shall verify that the trademark license status of the client shows as active on the scheme database or, where the client is not the license holder, shall seek written confirmation from MSC I that a third party is the license holder.

Guidance 7.1.9

If the client uses the MSC and/or ASC labels or other trademarks on its own products or for a Customer, the auditor will need to know the current status of the client's or customer's license agreement for the audit. Organizations that do not use any trademarks will not require a license Agreement. The auditor may also contact MSC I via ecolabel@msc.org for confirmation of license status.