



# CHAIN OF CUSTODY REQUIREMENTS

October 2023

**Canadian Roundtable for Sustainable Beef**  
180-6815 8<sup>th</sup> Street NE  
Calgary, AB T2E 7H7

The CRSB reserves the right to update this document at its sole discretion at any time for continued relevance and effectiveness. At a minimum, it is reviewed every five years in conjunction with the regular management review of the Framework and updated as needed.

It is the user's responsibility to ensure that they are using the most current version of the document maintained on the CRSB Certified website [crsbcertified.ca](https://crsbcertified.ca).

## **Versions**

<b>Version no.</b>	<b>Publication date</b>	<b>Description</b>
1.0	December 7, 2017	First published final version
1.1	August 28, 2018	Clarifications in mass balance and addition of group level
2.0	October 31, 2023	Update live cattle requirements

## **Validity and Transition**

The CRSB Chain of Custody Requirements version 2.0 will come into effect October 31<sup>st</sup>, 2023, and replaces all previous versions.

## **Responsibility for this Document**

The CRSB Sustainable Beef Framework Committee is responsible for this document. Any comments on this document can be submitted to [info@crsbcertified.ca](mailto:info@crsbcertified.ca).

The CRSB is not liable for any costs, or any potential, real or estimated loss of earnings resulting from any actions taken by a person or entity related to their participation in the program, including, without limitation, any actions taken prior to applying to become a program participant or Participating Operator. The full onus of responsibility for compliance with the Chain of Custody Requirements rests solely with the Client. For greater certainty, in no event shall the CRSB, its employee, or any other third party engaged by CRSB, bear any responsibility or liability for a Client's compliance with any CRSB Chain of Custody Requirements.

© The Canadian Roundtable for Sustainable Beef, a division of the Canadian Cattle Association (CCA). The CCA provides secretarial services for the CRSB. The CRSB operates with an independent multi-stakeholder Council that governs its operations and strategic direction.

# Table of Contents

<b>1.0</b>	<b>Introduction .....</b>	<b>4</b>
	<b>Objectives .....</b>	<b>4</b>
	<b>Participation .....</b>	<b>4</b>
<b>2.0</b>	<b>Definitions .....</b>	<b>5</b>
<b>3.0</b>	<b>Scope .....</b>	<b>5</b>
<b>4.0</b>	<b>Cattle Traceability Background .....</b>	<b>6</b>
<b>5.0</b>	<b>Management System Requirements for Primary Processors and Entities Involved in Further Processing or Packaging of Beef Products .....</b>	<b>6</b>
<b>6.0</b>	<b>Chain of Custody Models .....</b>	<b>8</b>
	<b>Identity Preservation .....</b>	<b>8</b>
	<b>Segregation .....</b>	<b>8</b>
	<b>Mass Balance .....</b>	<b>8</b>
	<b>Group Level .....</b>	<b>9</b>
<b>7.0</b>	<b>General Chain of Custody Requirements.....</b>	<b>9</b>
<b>8.0</b>	<b>Suspension &amp; Withdrawal .....</b>	<b>10</b>
<b>9.0</b>	<b>Complaints &amp; Appeals .....</b>	<b>11</b>
<b>10.0</b>	<b>References.....</b>	<b>11</b>

## 1.0 Introduction

The Canadian Roundtable for Sustainable Beef (CRSB) is a multi-stakeholder organization focused on advancing sustainability efforts within the Canadian beef industry. The CRSB's mission is to advance, measure and communicate continuous improvement in sustainability of the Canadian beef value chain.

The CRSB has developed the [Certified Sustainable Beef Framework](#) for stakeholders in the value chain to produce and source beef from CRSB certified operations. Given these numerous factors, the *Certified Sustainable Beef Framework* was developed with multiple purposes in mind as outlined below:

- Advance beef sustainability in Canada
- Recognize leadership and best practice within the industry
- Ensure a consistent, robust and meaningful definition of sustainable production in Canada
- Avoid duplicating efforts to define and verify sustainable operations
- Support supply chains interested in making meaningful sustainable sourcing commitments and subsequent communications
- Enable consumers to purchase sustainably sourced product
- Support the understanding of sustainable beef production in Canada

Wherever possible, the CRSB has followed the International Social and Environmental Accreditation and Labelling (ISEAL) Codes of Good Practices are followed throughout the Framework development process. The ISEAL "[Chain for Custody Models Guidance Version 1](#)" was used as a reference point.

### Objectives

The objective of this document is to provide the minimum management requirements for Chain of Custody (CoC) for individuals or organizations in order to demonstrate products produced, purchased, labelled, and sold as CRSB Certified originate from CRSB Certified Operations are legitimate and accurate.

Chain of Custody refers to how cattle and beef from Certified Operations are linked and tracked through the supply chain, including all organizations (supply chain) that take ownership, physically and/or administratively, of a product during production, processing and retail.

### Participation

Beef producers certified to the Sustainable Beef Production Standard do not require a chain of custody audit. Beef processors certified to the Sustainable Beef Processing Standard are authorized to sell beef with a CRSB Claim only if they successfully complete a CRSB chain of custody audit. See Section 3.0: Scope. The Certification Body will issue a CRSB Chain of Custody certificate when the

requirements in this document are verified as in compliance via a successful third party audit.

## 2.0 Definitions

**CRSB Certified Operation** – operations certified to the Sustainable Beef Production or Sustainable Beef Processing Standards.

**CRSB Claims** – see the CRSB’s Communications, Claims and Labelling Manual.

**Chain of custody** – the custodial sequence that occurs as ownership or control of the material supply is transferred from one custodian to another in the supply chain. Documenting chain of custody describes the list of all organizations (supply chains) that take ownership or control of a product during production, processing, shipping and retail (physically and/or administratively) (from ISEAL Alliance, 2016).

**Participating Operator** – facility seeking CRSB Chain of custody certification.

## 3.0 Scope

The scope for CRSB Chain of Custody Requirements include the management system and processing requirements for making **claims** about beef sourced from CRSB Certified Operations.

The requirements are applicable to any Participating Operator making Off-Product (claims that can only be made outside of Product Packaging and is not product-specific) and/or Product Specific (claim that may be made on Product Packaging, as well as other marking and advertising, in relation to a specific product) claims to its customers. See CRSB Communications, Claims and Labelling Manual. For the CRSB *Certified Sustainable Beef Framework*, chain of custody audits are required at the primary processor all the way through the supply chain and ends with the company or organization that is packaging the final product for sale to the end consumer.

Entities that are exempt from these Chain of Custody Requirements include:

- i. Entities purchasing labelled product ready for sale to the end consumer
- ii. Entities purchasing labelled product in consumer-ready tamper-proof packaging for further distribution.
- iii. Entities in the supply chain prior to primary processing that are out of scope for CRSB sustainability audits (e.g. auction markets, transport)
- iv. Entities that do not take legal ownership of beef products from Certified Operations after the primary processor (e.g. transportation/logistics companies).

Entities exempt from these Chain of Custody Requirements, but which purchase and

sell beef with a CRSB Mark and/or Claim must enter into a licensing agreement (see CRSB Communications, Claims and Labelling Manual) and shall track and report volumes of beef purchased with a CRSB Claim from Participating Operators.

#### 4.0 Cattle Traceability Background

As per the Canadian Food Inspection Agency (CFIA), all cattle born in Canada must be tagged with an approved Canadian Cattle Identification Agency (CCIA) radio frequency identification (RFID) ear tag upon leaving the farm of origin. All tags are visually and electronically embedded with a unique identification number. Learn more at <http://www.canadaid.com>.

In order to enable labelling and sale of beef from CRSB Certified Operations and provide options for making CRSB Claims, source cattle must be tracked from birth farm or ranch through the beef supply chain through to the processing plants where they are slaughtered.

#### 5.0 Management System Requirements for Primary Processors and Entities Involved in Further Processing or Packaging of Beef Products

The Participating Operator will have a documented management system that maintains the integrity of the information about cattle/beef that have moved through CRSB Certified Operations from birth through to and including primary processing. It must meet the following requirements:

- a. The Participating Operator shall identify a representative that is responsible and accountable for the chain of custody management system.
- b. The Participating Operator shall maintain a list of personnel involved in the implementation of the chain of custody management system.
- c. The Participating Operator shall provide training to all personnel involved in the implementation of the chain of custody management system.
- d. ***For primary processor only:*** Participating Operators shall have documented records (which must include evidence derived directly from a CRSB-approved live cattle chain of custody verifier) demonstrating that cattle have moved through the applicable CRSB Certified Operations using RFID with age verification and only beef from these animals shall be eligible to carry a CRSB Claim.
  - Cattle must move through CRSB Certified Operations (that are in scope for a certification audit in the Sustainable Beef Production Standard and Sustainable Beef Processing Standard) from birth up to and including the primary processor to qualify for a CRSB Claim.

- For operations certified to the CRSB Sustainable Beef Production Standard after January 1, 2023, animals born on or moved in from another Certified Operation within six-months of the operation's certification date<sup>1</sup>, will still qualify for a CRSB Claim if no major non-conformities<sup>2</sup> were identified during the Certification Body's initial audit.
- e. Following the primary processing stage, the Participating Operator shall have written procedures in place for controlling the acquisition, handling, processing, mixing, storing, packaging, delivery, transport and resale of beef products coming from CRSB Certified Operations.
- f. As applicable, the Participating Operator shall identify the main processing steps and specify the conversion factor for each step. Conversion factors used within the processing facility must be based on Agriculture and Agri-Food Canada's Red Meat Conversion Factors<sup>3</sup> or another scientifically accepted method. The calculations shall be documented and kept up to date.
- g. A yearly internal review of the chain of custody management system to confirm conformity with these requirements shall be conducted. Non-conformities must be addressed through a corrective action plan.
  - The internal review shall include at least one individual animal traceback to birth farm through CRSB Certified Operations to confirm the effectiveness of the chain of custody system.
- h. The Participating Operator shall document procedures to demonstrate how it avoids contamination or uncontrolled mixing (unless the mass balance model is adopted).
- i. The Participating Operator shall have a recall procedure for beef in the event that there is a break in their applicable chain of custody (e.g. contamination, uncontrolled mixing).
- j. All documentation shall be legible, dated, current, and kept for a minimum of five years.

---

<sup>1</sup> Certification date is the date on which the official certification was issued by a CRSB Certification Body.

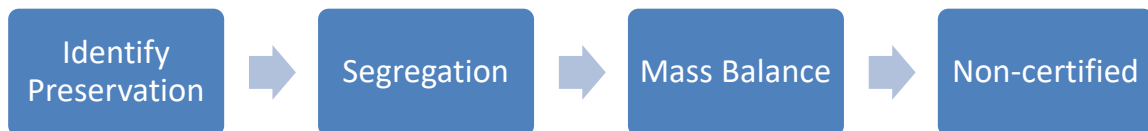
<sup>2</sup> Operation does not comply with the CRSB Production Standard, and the integrity of the outcome is jeopardized. Animals, people and resources are potentially at risk of harm due to the (lack of) management practices in place.

<sup>3</sup> Agriculture and Agri-Food Canada. (2017). Red meat conversion factors. Available online: <https://agriculture.canada.ca/en/sector/animal-industry/red-meat-and-livestock-market-information/slaughter-and-carcass-weights/conversion-factors>

- k. The Participating Operator shall only make CRSB Claims, in accordance with the CRSB Communications, Claims and Labelling Manual. The claims shall be approved by CRSB prior to use.

## 6.0 Chain of Custody Models

There are three allowable chain of custody models that a Participating Operator can use: Identity Preservation (IP), Segregation and Mass Balance described in the following. Participating Operators cannot choose a model that is stricter than any previous link in the supply chain. For example, beef from CRSB Certified Operations can start in one chain of custody model and then transfer to another as it moves through the supply chain; however, it can only move to a less strict model. As per the figure, this is moving from left to right.



### Identity Preservation

Beef originating from one birth farm that has moved through a CRSB Certified Operation cannot be mixed with beef from another birth farm, whether or not the other beef has moved through CRSB Certified Operations.

- The Participating Operator shall track and report volumes of beef purchased and sold with a CRSB Claim.

Example: Processor or retailer wants to make a claim about the identity of the farm/ranch/feedlot the beef came from, the claim only applies if traced back through CRSB Certified Operations to the birth farm.

### Segregation

Beef that has moved through CRSB Certified Operations must be kept separate from beef that has not moved through CRSB Certified Operations.

- The Participating Operator shall track and report volumes of beef purchased and sold with a CRSB Claim.

### Mass Balance

Physical mixing or blending of beef from CRSB Certified Operations and beef from non-certified operations is allowed.

- a. The Participating Operator shall develop and maintain records to document volumes of beef from CRSB Certified Operations for the following: a) purchased as inputs that meet the claim requirements; b) inputs and



outputs in stock; and c) outputs sold.

- Volumes must be reconciled and reported bi-annually. Outputs shall not exceed inputs at the time of reconciliation. Overages can be carried over for one reconciliation period.
- b. The Participating Operator shall ensure that the allocation of beef from CRSB Certified Operations being delivered and/or sold to its customers is consistent with the data to support the claim being passed on.
- c. The Participating Operator shall track and report volumes of beef purchased and sold to its customers with a CRSB Claim.
- d. Shortages shall not be permitted (i.e. outputs cannot exceed inputs). Shortages shall be reported immediately to the Certification Body and the CRSB. The Participating Operator shall be given 45 days to correct the shortage. If the shortage is not corrected in the given timeframe, the chain of custody certification shall be suspended, use of the Certification Mark shall cease, and this will be communicated to the applicable customers. (See section 8.0 Suspension & Withdrawal)

### **Group Level**

This option is provided to Participating Operators with multiple sites linked by common ownership or legal/contractual agreements. All the requirements in the respective chain of custody model apply to the group level. In addition:

- a. the Participating Operator shall identify and define the sites (facilities), applicable chain of custody models and the types of operations covered by their multi-site chain of custody system.
- b. the Participating Operator shall be responsible for ensuring all sites are in compliance with all certification requirements at all times.

The Participating Operator shall be subject to the Certification Body's audit schedule, including the initial assessment and annual surveillance audits, in addition to a sample of the sites during each evaluation.

## **7.0 General Chain of Custody Requirements**

Upon successful completion of a CRSB chain of custody audit (see Assurance Protocols for Certification Bodies, Clients and Oversight Body), the Certification Body will issue the Participating Operator a CRSB chain of custody certificate.

- a. The Participating Operator shall assume responsibility for the compliance of

- any sub-contractors to the CRSB Chain of Custody Requirements and shall have a documented system in place to ensure compliance.
- b. A copy of the CRSB chain of custody certificate shall be provided to the customer (other than an end consumer) purchasing beef from a CRSB chain of custody certificate holder that carries a CRSB Claim.
  - c. The CRSB chain of custody certificate number and the name of Participating Operator will be posted on the Certification Body's website, upon approval of the Participating Operator.
  - d. Any information related to these requirements must be provided to the Certification Body or the CRSB upon request; timeframe dependent upon the nature of the request, to be specified by the Certification Body or CRSB in their request. The Certification Body and the CRSB reserve the right to conduct random audits at any time.
  - e. The Participating Operator shall notify the Certification Body immediately regarding any substantive changes to the chain of custody management system.
  - f. The Participating Operator will be audited by the Certification Body to these requirements according to the audit cycle set by the CRSB (see Assurance Protocols for Certification Bodies, Clients and Oversight Body for details). Note that it is possible for one Participating Operator to have more than one chain of custody system.

In some cases, both a processing audit and chain of custody audit can be conducted at the same time, if desired. Your Certification Body can advise you on what processes you need in place.

Read the Communications, Claims and Labelling Manual for the details of the applicable claims and logo use options available to you. Visit the website [crsbcertified.ca](http://crsbcertified.ca) or contact us directly at [approvals@crsbcertified.ca](mailto:approvals@crsbcertified.ca).

## 8.0 Suspension & Withdrawal

It is critical to limit false claims in CRSB Certified supply chains and take strong actions against violations of CRSB's *Certified Sustainable Beef Framework*.

The decision to suspend or withdraw certification of a Participating Operation shall be communicated by that Participating Operator to all of its supply chain actors (customers) by a formal letter. The letter shall include:

- A statement on the decision to suspend the certificate, including a proper

description of the situation,

- A statement that the use of all advertising and communications material referencing the certificate is prohibited during the suspension period, and
- Start date of the suspension.

The Certification Body and/or CRSB must verify that all conditions and corrective actions are a) met to revoke the suspension and declare a valid certificate, or b) not met, resulting in permanent withdrawal of the certificate.

## 9.0 Complaints & Appeals

CRSB takes complaints seriously and is committed to resolving them as expediently as possible. The complaints and appeals procedure is not intended to verify legal compliance or endorse any activity as meeting any legal requirements that may apply to an individual operation.

The type of complaint and/or appeal determines how it is managed and by whom. Wherever possible, disagreements and disputes should first attempt to be resolved directly between the parties that disagree.

Any individual, Client or CRSB has the right to appeal a decision made by the Certification Body. Clients should submit complaints on auditor or Certification Body performance or appeal of any certification decisions directly to the respective Certification Body. If dissatisfied with the response, appeals can be submitted directly to CRSB.

Members of the public may register complaints and appeals to the Certification Body, or CRSB, who will direct the complaint or appeal to the appropriate entity.

For general complaints about CRSB, governance and/or its processes, contact [complaints@crsbcertified.ca](mailto:complaints@crsbcertified.ca).

For complaints and appeals related to the CRSB Certification Mark(s) and Communications, Claims and Labelling Manual, contact [complaints@crsbcertified.ca](mailto:complaints@crsbcertified.ca).

## 10.0 References

International Social and Environmental Accreditation and Labelling (ISEAL) Alliance. (2016). Chain of custody models and definitions: A reference document for sustainability standards systems, and to complement ISEAL's Sustainability Claims Good Practice Guide. ISEAL Alliance, London, UK.