



## Responsible Supply of Marine Ingredients

# Chain of Custody Standard Version 2

*A Tool for Voluntary Use in Markets for*

*Products of Marine Ingredients*

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**MarinTrust Programme**

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## Foreword

MarinTrust is the leading independent business to business certification **programme for the marine ingredients value chain.**

Responsible sourcing and manufacturing is vital if marine ingredients are to remain a relevant ingredient in feed for culture, agriculture, pet care and directly in the production of consumer products, **including cosmetics and nutraceuticals. Fishmeal and fish oil make up the largest share of marine ingredients today, however all marine ingredients (see definition in the definitions section below) are included in MarinTrust's scope.**

In order to enable stakeholders to credibly demonstrate the commitment to responsible practice in areas of feed safety, raw material procurement, delivery, and throughout the production process, MarinTrust developed a robust Certification Programme<sup>1</sup>, consisting of three main components:

- **The MarinTrust Standard:** The verification and **certification** of marine ingredients **factories** that source their raw material from approved fisheries and by-product fisheries,
- **The MarinTrust Chain of Custody (CoC) Standard:** The verification and **certification** of the chain of custody for marine ingredients (**products**) that come from MarinTrust certified factories along the value chain to the customer.
- **The Improver Programme:** The verification and **approval** of marine ingredients **factories** that source their raw material from accepted MarinTrust Improver fisheries.

Standards under the MarinTrust Programme are developed in accordance with the ISEAL Standard Setting Code and following ISO guidance. The programme is managed by the MarinTrust Secretariat under the MarinTrust governance led by its **Governance Body Committee (GBC)** and subsequent **multi-stakeholder committees.**

In order to become certified under the MarinTrust programme, applicants must be able to demonstrate compliance with the Standard criteria, through a third-party audit conducted by an independent, ISO 17065 accredited **Certification Body** approved to certify against MarinTrust Standards. Certificate holders who have demonstrated compliance to the MarinTrust Standard(s) can apply to the MarinTrust Secretariat for use of the Certified MarinTrust Logo<sup>2</sup>.

The MarinTrust Programme is recognised and endorsed throughout the marine ingredient value chain and by aquaculture certification programmes including BAP, ASC and Global GAP, as well as feed manufacturers, retailers and pet food manufacturers.

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<sup>1</sup> The official language of this standard is English. The definitive version is maintained at [www.marin-trust.com](http://www.marin-trust.com). Any discrepancy between copies, versions or translations shall be resolved by reference to the definitive English version.

<sup>2</sup> Further Information regarding application, rules and regulations can be found on the MarinTrust website [www.marin-trust.com](http://www.marin-trust.com) or by contacting Standard Owner at [standards@marin-trust.com](mailto:standards@marin-trust.com) and/or approved Certification Bodies listed [here](#).

# Introduction

## Introduction to the MarinTrust Chain of Custody standard (CoC)

In 2018 MarinTrust Chain of Custody Standard V1.1 underwent an extensive review, in line with good practice and in compliance with the ISEAL Standard Setting Code requirement. This review identified areas of opportunity and improvement and these were documented in a new Terms of Reference for the development of a MarinTrust Chain of Custody Standard V2.

**The MarinTrust Chain of Custody Standard V2 was published on 31 August 2020 and is effective from 30 November 2020.**

Through the Programme framework, the requirements for certification are subject to continual review and improvement. Subsequent reviews of the standard will be carried out at least every five years to ensure continued relevancy and effectiveness to achieve its stated objectives.

The purpose of this new Chain of Custody standard is to provide the industry with a clear statement of the requirements of Chain of Custody Certification and to provide an assurance to a labelled Certified claim on a feed or fish oil product that it uses marine ingredients that originate from a Certified 'MarinTrust Factory'.

### Key Objectives

- To ensure that marine ingredients used come from MarinTrust certified sources and that full traceability is maintained throughout the supply chain.
- To ensure no Illegal, Unreported and Unregulated (IUU) fishery materials are used
- To ensure pure and safe products are further processed under a robust Quality Management System, thereby demonstrating freedom from potentially unsafe and illegal materials
- To ensure that MarinTrust CoC standard remains relevant, robust and fit for purpose.
- To prevent non MarinTrust compliant product being labelled as MarinTrust.

## Main features of the revised MarinTrust Chain of Custody Standard

The key features of the MarinTrust Chain of Custody Standard V2 are summarised below:

### 1) Audit Technology

- Use of emerging technology (e.g. Key Data Element transfer through the supply chain) to source the origin of certified MarinTrust compliant marine ingredients

### 2) Standard Collaboration

- Recognition of other standards and regulatory authority standards to meet in part or in full the requirements of the MarinTrust Chain of Custody Standard

### 3) Quality Assurance

- Identify ways of detecting fraudulent activities (e.g. adulterations and substitution) by having rigorous traceability system checks e.g. mass balance checks and volume reconciliations within the standard and systems to handle non-conforming products
- Improve the use of the MarinTrust Logo and claim to protect the integrity of the entire programme
- Continue the current certification model to ensure it remains in alignment with ISO 17065 and the ISEAL Assurance Code.

### 4) Streamlining Requirements

- Standard and Certification Requirements at each link in the chain need to be reviewed to seek areas of opportunity to streamline, especially in the wholesaler/trader/sub-contractor segments.

The Key Changes from MarinTrust Chain of Custody (CoC) Standard V1.1 to V2 are summarised as follows:

Section	CoC V1.1	CoC V2	Differences
1	General Principles of Traceability	General Principles of Traceability	New clauses relating to <b>Supplier approval and monitoring systems including traders and involving agents/brokers with batch control (KDEs), HACCP/VACCP/TACCP requirements with greater emphasis on material origin.</b>
2	Traceability within the Supply Chain	Traceability Verification and Labelling	Revised clauses covering <b>Mass balance calculations Labelling and segregation to cover all facility activities where applicable from initial storage, processing, final dispatch, final storage, delivery for client, etc.</b>
3	Traceability and Labelling	Sub-contractors	New section – <b>evaluation and documented control of subcontractors used by a facility including mass balance exercises and product integrity</b>
4	-----	Use of the Certification Logo or Claim	Reinforced section – <b>label verification and control over the use of the MarinTrust logo or claim.</b>
5	-----	Staff training and Key Representatives Responsibilities	New section – <b>introduction of documented training system for relevant staff members</b>
6	-----	Requirements for IP Marine Ingredients	New section – For CoC holders that <b>ALSO</b> handle IP material. Cover <b>verification of origin, segregation and effective traceability testing.</b>

## Scope and Applicability

**The standard applies to marine ingredient processing facilities, defined as being the unit of certification.** These include all locations and scales of operation for marine ingredient processing activities such as: further processing, packing, refining and/or trading of marine ingredients after the certified MarinTrust marine ingredient producing site.

This document outlines the requirements that shall be achieved for certification to the MarinTrust Chain of Custody Version 2.0 Standard and defines the criteria for the sourcing and manufacturing of marine ingredients.

Applicants must have been in production for a minimum of 6 months prior to the certification audit date, however, applicants may apply to the programme prior this in order ensure that they are audit ready.

## Eligibility and Prerequisites

A Potential applicant could be a:

- Primary Processor/Packer
- Storage Provider
- Oil Refiner
- Secondary Processor
- Trader

Potential applicants are advised to carry out a self-assessment against the Standard in order to ascertain their readiness for external assessment. Applicants must ensure that they have all necessary records of performance data covering the periods of time specified in the Standard available immediately prior to the audit for certification.

For the applicant to qualify for application and subsequent certification against the MarinTrust CoC Standard, it shall meet the following prerequisite eligibility requirements:

- 1) The applicant facility shall be involved in the processing/packaging, refining/storage/trading/blending activities of certified MarinTrust marine ingredients and, (if available) marine ingredients from the MarinTrust Improver programme.
- 2) The applicant facility shall be legally licenced in the country of operation.
- 3) The applicant's facility **shall provide evidence** that they satisfy the following minimum entry criteria for the scope under certification:

- a) **Food safety certification** – GFSI3 benchmarked schemes if handling certified marine ingredients for human consumption. GMP+ or equivalent if handling marine ingredients for animal feed.
  - b) **Social accountability** – meet the requirements of the national regulatory authorities that oversee their operation.
  - c) **Environmental accountability** – meet the requirements of the national regulatory authorities that oversee their operation.
- 4) A disclaimer stating that the audit is limited to the CoC (regulatory requirements, traceability, mass balance, labelling, MarinTrust logo use) shall be signed.

MarinTrust and its certified marine ingredient producers shall not be liable in the event the products handled at the facility and/or the facility are implicated in legal, social, environmental, food safety situations.

## Normative References

The documents listed below, contain provisions that underpin this MarinTrust CoC Standard:

- ISO 19011:2018 – Guidelines for auditing management systems
- ISO/IEC 17021-1:2015 – Conformity assessment — Requirements for bodies providing audit and certification of management systems
- ISO/IEC 17065:2012 – Conformity assessment — Requirements for bodies certifying products, processes and services
- ISO/IEC Guide 2:2004 – Standardisation and related activities
- ISO 22005:2007 – Traceability in the Feed and Food Chain
- ISO/CD22095 Chain of Custody
- ISO 12875/77:2011 Traceability for finfish products
- Global Food Safety Initiative Guidance Document – Issue 7.1
- Codex Alimentarius HACCP Standards
- GMP+ animal feed standards
- IFFO RS Chain of Custody Standard V1.1 2013
- Global Dialogue on Seafood Traceability (GDST)
- GS1 Global Traceability Standard
- GS1 Foundation for Fish, Seafood and Aquaculture Traceability Guideline
- MarinTrust logo guidelines



## Legal References

Applicants shall fully meet the legal obligations that are in place for the jurisdiction(s) where marine ingredients are processed to be considered for certification. This certification does not exempt an applicant from meeting their legal obligations and if they are successfully prosecuted by their regulatory jurisdiction their certification status to this standard shall be investigated and may be withdrawn depending on the nature of the offence committed.

Certification of an applicant does not place any liability on MarinTrust or any associated body involved in the development, implementation, auditing and issuing of certificates of this programme brought about through failure of an applicant to meet their legal obligations.

## Acknowledgements

MarinTrust would like to thank the members of the MarinTrust Governing Body Committee, the MarinTrust Technical Advisory Committee and the MarinTrust Standards Steering Committee for their commitment, expertise and contributions throughout the development of the new version of the MarinTrust Chain of Custody Standard V2.0.

## SECTION 1 – General Principles of Traceability

<p><b>1.1</b> The applicant shall have a documented and signed policy that states that they are committed to achieving and adhering to the requirements of the MarinTrust Chain of Custody (CoC) Standard.</p>
<p><b>Full Compliance:</b> The applicant site has a written commitment to the MarinTrust Chain of Custody Standard. This document has been approved and signed by the site’s CEO or an equivalent senior manager.</p>
<p><b>1.1.1</b> The applicant shall have a process to ensure that this policy is communicated to all staff within the site.</p>
<p><b>Full Compliance:</b> The applicant can demonstrate that this policy has been fully communicated to <u>all</u> staff within the facility. For example, during new staff inductions, staff training etc</p>
<p><b>1.2</b> The applicant shall have a documented and <b>effective supplier approval and monitoring system</b> to ensure that incoming marine ingredients intended to be identified as compliant, are sourced from an approved fishery, or a certified supplier that holds a valid MarinTrust or MarinTrust CoC certification.</p>
<p><b>Full Compliance:</b> The applicant will have an up-to-date system of MarinTrust certified suppliers and be able to demonstrate that they hold a valid MarinTrust or MarinTrust CoC certification.</p>
<p><b>1.2.1</b> MarinTrust compliant marine ingredients that are purchased via a third-party agent, or broker that does not physically handle or own the certified product the following shall apply:</p>
<p><b>1.2.1.1.</b> The <b>applicant shall have documents/evidence provided from these suppliers</b> in place, to prove the identity of the marine ingredients back to an approved fishery or by product.</p>
<p><b>Full Compliance:</b> If the third-party is not certified to the MarinTrust CoC Standard they can provide full documentation to allow complete traceback of marine ingredients to approved fishery, or a supplier that holds a valid MarinTrust or MarinTrust CoC certificate for factory marine ingredients</p>
<p><b>1.2.1.2</b> The <b>applicant shall ensure that they have been trained/made aware/informed on the requirements to maintain the product integrity status of these certified materials and shall sign a form stating their commitment to the MarinTrust CoC standard.</b></p>

<p><b>Full Compliance:</b> If the third-party agent or broker is used to source supplies of the MarinTrust compliant marine ingredients there shall be documented evidence that training has been undertaken by the applicant to this entity to ensure that they fully understand and commit to comply with the requirements of the MarinTrust CoC standard to maintain the product integrity of the MarinTrust compliant marine ingredients. After this training has been completed, the agent/broker should sign a declaration that they understand the requirements and will comply with them.</p>
<p><b>1.2.1.3 The applicant shall ensure that they have been trained/made aware/informed of the requirements to maintain the product integrity status of these certified materials by an approved consultant or trainer to the MarinTrust programme.</b></p>
<p><b>Full Compliance:</b> There is full documentary evidence that all agents/brokers have been trained by an approved trainer /consultant to the current MarinTrust standard</p>
<p><b>1.3</b> A batch/lot record of all MarinTrust compliant marine ingredients is fully maintained.</p>
<p><b>Full Compliance:</b> Batch/lot record of all MarinTrust compliant marine ingredients is fully maintained.</p>
<p><b>1.3.1</b> The batch/lot record shall contain the following information;</p> <ul style="list-style-type: none"> <li>• Supplier name</li> <li>• Supplier unique MarinTrust certificate number</li> <li>• Volume of MarinTrust compliant marine ingredients received from each supplier.</li> </ul> <p>The following clauses are Derogated</p>
<p><b>1.3.1.1</b> The batch/lot record shall contain the following information; <b>(DEROGATION CLAUSE)</b></p> <ul style="list-style-type: none"> <li>• Key Data Element (KDE) information on the source fishery for whole fish to include, fishing vessel(s), species, catch area and date of landing</li> <li>• Key Data Element (KDE) information on source processing factory for by-product trimmings to include factory name, species and date of processing.</li> </ul>
<p><b>Full Compliance:</b> Supplier details, volumes of product, and KDE information is comprehensive and appears to have been entered correctly.</p>
<p><b>1.4</b> The applicant shall have a <b>documented product management system</b> in place to demonstrate how MarinTrust compliant marine ingredients are <b>segregated and labelled</b> from non-certified product during all the processes within the Applicant’s organisation.</p>
<p><b>Full Compliance:</b> The applicant has a demonstrably effective product management system in place to keep labelled MarinTrust product <b>segregated</b> from marine ingredients that are produced from non-approved material</p>

<p><b>1.5</b> The applicant shall have in place an effectively implemented procedure to deal with any non-conformances arising from a failure of the marine ingredients product management system stated in 1.4, which may result in MarinTrust compliant marine ingredients being mixed with non-compliant material.</p>
<p><b>Full Compliance:</b> The applicant will have a <b>procedure in their product management system on how</b> to deal with the case where a loss of traceability or eligibility of MarinTrust compliant material has occurred. This procedure shall include a full root cause analysis as to why this non-conforming product occurred.</p>
<p><b>1.6</b> Any Corrective Action Plans resulting from a non-conforming products procedure shall be accurately documented and shall include a root cause analysis</p>
<p><b>Full Compliance:</b> Corrective Action Plans have a root cause analysis and have been accurately documented. OR No non-conforming product procedure activated.</p>
<p><b>1.6.1</b> Corrective Action plans shall identify authorised responsible personnel to handle the remedial changes required, based on their severity or risk.</p>
<p><b>Full Compliance:</b> Authorised responsible personnel identified based on the risk level of the non-compliance identified. OR No non-conforming product procedure activated.</p>
<p><b>1.6.2</b> All remedial changes shall be part of a corrective action plan to mitigate these incidents happening again in future and shall be time specified.</p>
<p><b>Full Compliance:</b> Remedial changes are clearly stated and time bound. They are shown to be part of a plan to ensure these incidents are mitigated against in future. OR No non-conforming product procedure activated.</p>
<p><b>1.6.3</b> The applicant shall notify their certification body within 24 hours of a product recall being actioned as result of this non-conforming product procedure being activated.</p>

<p><b>Full Compliance:</b> The applicant will have a procedure in their management system on the product recall requirements for MarinTrust certified marine ingredients. In this procedure, there will be a list of contacts that should be informed and one of these will need to be the certification body that awards them their MarinTrust certificate. The time frame for informing the certification body (i.e. <b>within 24 hours</b>) shall be stated within this procedure.</p>
<p><b>1.6.4</b> The applicant shall inform any customer affected by a non-conforming MarinTrust product <b>immediately, and no later than 24 hours</b> following detection.</p>
<p>Full Compliance: Customer has been informed within 24 hours of an issue being detected. OR Non-conforming product procedure activated.</p>
<p><b>1.7</b> All records relating to the execution of the non-conforming product procedure shall be retained for a <b>period of at least 3 years</b>.</p>
<p><b>Full Compliance:</b> The applicant will have a procedure that requires all records for non-conforming products to be kept for three years in their management system. The records can either be in a hard or electronic format. The auditor should take a sample of records to confirm that this procedure is being adhered to.</p>
<p><b>1.8</b> The applicant shall have a HACCP system in place to protect the integrity of products being produced within their operation.</p>
<p><b>Full Compliance:</b> The HACCP system is appropriate to the specific circumstances at the facilities under assessment (i.e. is the manufactured product for human / animal consumption?).</p>
<p><b>1.8.1</b> The applicant shall have a TACCP/VACCP system in place to protect the integrity of products being produced within their operation if intended for direct human consumption.</p>
<p><b>Full Compliance:</b> The TACCP/VACCP system is appropriate to the specific circumstances at the facilities under assessment (i.e. is the manufactured product for human consumption?).</p>

## SECTION 2 – Traceability Verification and Labelling

<p><b>2.1</b> MarinTrust compliant marine ingredients, or the finished product, <b>shall</b> be labelled or otherwise identified in a manner that ensures traceability is maintained during the following key traceability steps MarinTrust:</p>
<p><b>Full compliance:</b> Applicant ensures that MarinTrust compliant materials and finished products are identifiable at all stages outlined in clauses 2.1.1 – 2.1.8 with required documentation in place.</p>
<p><b>2.1.1</b> from the point of receipt,</p>
<p><b>Full compliance:</b> MarinTrust compliant materials arrive clearly labelled (where this is feasible) with appropriate documentation.</p>
<p><b>2.1.2</b> during initial storage,</p>
<p><b>Full compliance:</b> MarinTrust compliant materials are clearly labelled in storage, and there is an inventory showing where MarinTrust compliant materials are stored.</p>
<p><b>2.1.3</b> during processing,</p>
<p><b>Full compliance:</b> During processing the batch/lot number(s) of the MarinTrust compliant material is recorded.</p>
<p><b>2.1.4</b> during work in progress storage,</p>
<p><b>Full compliance:</b> MarinTrust compliant materials are clearly labelled in storage, and there is an inventory showing where MarinTrust compliant materials are stored.</p>
<p><b>2.1.5</b> during packaging,</p>

<p><b>Full compliance:</b> Packaging is correctly labelled/ claims are correct. Associated documentation is in place that would allow traceability of the packaged product back to supplier / source fishery.</p>
<p><b>2.1.6</b> during final storage, and third-party storage</p>
<p><b>Full compliance:</b> MarinTrust compliant materials are clearly labelled in storage, and there is an inventory showing where MarinTrust compliant materials are stored.</p>
<p><b>2.1.7</b> during final dispatch, handling</p>
<p><b>Full compliance:</b> Invoice for product contains batch/lot codes to allow buyer of the MarinTrust compliant product to traceback to supplier/ source fishery if required.</p>
<p><b>2.1.8</b> during delivery to their customer</p>
<p><b>Full compliance:</b> Upon delivery, buyer receives copy of a delivery note (or invoice) stating batch/lot codes of MarinTrust compliant product.</p>
<p><b>2.2</b> The applicant shall have documented evidence that MarinTrust compliant marine ingredients are segregated from non-certified product by either:</p> <ul style="list-style-type: none"> <li>• Physical separation, or</li> <li>• Temporal separation,</li> </ul> <p>during the following key traceability stages MarinTrust:</p>
<p><b>Full compliance:</b> Throughout the production process MarinTrust approved materials and the MarinTrust approved finished product(s) are kept physically or temporally segregated from non-certified products, and the applicant can provide evidence of this.</p>
<p><b>2.2.1</b> from the point of receipt,</p>
<p><b>Full compliance:</b> MarinTrust compliant materials are delivered separately/ clearly segregated from non-certified materials.</p>
<p><b>2.2.2</b> during initial storage,</p>

<b>Full compliance:</b> MarinTrust compliant materials are kept separate from non-certified materials in storage.
<b>2.2.3</b> during processing,
<b>Full compliance:</b> A separate processing line is used for MarinTrust compliant materials or processing of MarinTrust compliant materials from uncertified materials is temporally segregated.
<b>2.2.4</b> during work in progress storage,
<b>Full compliance:</b> MarinTrust compliant materials are kept segregated from non-certified materials in storage.
<b>2.2.5</b> during packaging,
<b>Full compliance:</b> MarinTrust compliant products are packed separately from non-certified products.
<b>2.2.6</b> during final storage and third-party storage,
<b>Full compliance:</b> MarinTrust compliant materials are kept segregated from non-certified materials in storage.
<b>2.2.7</b> during final dispatch, handling
<b>Full compliance:</b> MarinTrust compliant materials ready for final dispatch are kept segregated from non-certified materials.
<b>2.2.8</b> during delivery to customer
<b>Full compliance:</b> During delivery MarinTrust compliant materials are kept segregated from non-certified materials.



<p><b>2.3</b> The applicant shall maintain accurate records of the quantities / volumes of MarinTrust compliant marine ingredients and the finished product bought and sold (or received and dispatched) which take into account production practices that could affect the final quantity or volume calculations using a MASS balance exercise.</p>
<p><b>Full compliance:</b> The applicant maintains accurate up-to-date records of quantities/ volumes of fishmeal/ fish oil /finished product bought and sold across their entire product range.</p>
<p><b>2.4</b> The applicant shall report on input quantities and finished product quantities used on a quarterly basis to MarinTrust (<b>DEROGATED CLAUSE</b>)</p>
<p><b>Full compliance:</b> The applicant reports on input quantities and finished product quantities to MarinTrust after the derogation period has elapsed on a quarterly basis. These records can be obtained from MarinTrust.</p>
<p><b>2.5</b> The applicant shall conduct a documented verification test of their product management system across the entire range of MarinTrust compliant marine ingredients or finished product by <b>batch/lot number or volume produced</b>.</p>
<p><b>Full compliance:</b> Following the <b>Traceability Test</b>, complete traceability can be demonstrated following batch/lot numbers for the entire range of MarinTrust compliant marine ingredients and finished products. If a <b>mass balance</b> exercise is undertaken the volume/ weight of seafood in MarinTrust compliant finished products does not exceed the weight of MarinTrust compliant raw materials.</p>
<p><b>2.5.1</b> This verification test shall be carried out at <b>least once per year with a gap no greater than 12 months between tests</b>, and shall include a traceability challenge both <b>from receipt to despatch and from despatch back to receipt</b></p>
<p><b>Full compliance:</b> The applicant can demonstrate that the verification test has been carried out at least once per year, and that a <b>trace forward</b> (receipt to dispatch) and <b>trace backwards</b> (dispatch to receipt) traceability test has been carried out for the full range of MarinTrust compliant products.</p>
<p><b>2.6</b> Any Corrective Action Plans resulting from non-conformities raised during this verification test of the product management system shall be accurately documented;</p>
<p><b>Full compliance:</b> Non-conformities and corrective action plans are fully documented by the applicant in the template in the <b>Non-Compliance tab</b> in the supplementary spreadsheet entitled <b>Traceability verification test – guidance and templates</b>. OR</p>

No non-conformities were raised during the applicant’s verification test.
<b>2.6.1</b> Corrective Action Plans shall identify authorised responsible personnel to handle the remedial changes required
<b>Full compliance:</b> Authorised responsible personnel are identified to handle any remedial changes. OR No non-conformities were raised during the applicant’s verification test.
<b>2.6.2</b> All remedial changes shall be part of Corrective Action plan to mitigate these incidents happening again in future and shall be time specified.
<b>Full compliance:</b> Remedial changes are clearly stated, time bound and part of a plan to mitigate these incidents happening again in the future. OR No non-conformities were raised during the applicant’s verification test.
<b>2.7</b> Where processing or packing / repacking occurs, records shall allow conversion rates for the finished product outputs from MarinTrust compliant marine ingredients inputs over any given batch or time period to be calculated.
<b>Full compliance:</b> Records of quantities/ volumes of input materials and processed or packaged products are comprehensive to allow conversion rates for the finished product outputs to be calculated. The % of certified MarinTrust compliant material in the final product cannot exceed that of the input materials.
<b>2.7.1</b> Conversion rates for processing of the finished product that has used MarinTrust compliant marine ingredients shall be justifiable, and verifiable
<b>Full compliance:</b> Conversion rates have been properly calculated and are verifiable and justifiable.
<b>2.8</b> The Applicant shall conduct an annual <b>internal monitoring audit of all MarinTrust processes including a documented product recall test or after traceability-based complaint or incident</b> test to ensure that the non-conforming product procedure as stated in 1.5 is functioning correctly and effectively.

**Full compliance:** The Applicant can evidence that an internal monitoring audit and documented product recall test has been carried out. They should be able to demonstrate that the procedure is functioning correctly and would be effective should it have to be used. Any failings have been identified and rectified.

**2.9** All traceability and identification records **shall be kept for the shelf life of the product, or a minimum of 3 years, whichever is longer.**

**Full compliance:** All traceability and identification records have been kept for a minimum of 3 years.

**2.9.1** All records used to provide evidence of compliance to this MarinTrust CoC Standard shall be accurate, legible and unadulterated.

Full compliance: All records are accurate, legible and unadulterated.

**2.10** The applicant shall co-operate with the Certification body and/or MarinTrust CoC Standard holder if they are asked to participate in an MarinTrust product integrity investigation by the supplying of documentary evidence within 5 days of a request for information.

**Full compliance:** The applicant fully co-operates with the CB and/ or MarinTrust should the need arise for a product integrity investigation. Documentary evidence is supplied within a period of 5 days from the receipt of a request for information.

## SECTION 3 – Subcontractors

**3.1** Where the applicant utilises the services of a subcontractor (carrying out contract storage, processing, packing, labelling), the subcontractor shall be audited by the applicant’s certification body and **shall be compliant with the requirements of the MarinTrust CoC Standard.**

**Full compliance:** The applicant can demonstrate that subcontractor(s) facilities have been audited as part of the applicant’s certification to the MarinTrust CoC Standard, and the subcontractor’s facilities are in compliance with the standard.

**3.2** The applicant shall maintain an up-to-date record of the names and addresses of all approved subcontractors handling MarinTrust compliant marine ingredients and the identity of the certified finished products.

**Full compliance:** The applicant maintains an up-to-date record of the names and address of all approved subcontractors handling MarinTrust compliant marine ingredients and the identity of the finished products.

**3.3** If third party storage facilities are used, the applicant shall have the ability to request the MarinTrust compliant marine ingredients and the certified finished products records from subcontractor storage facilities to allow for verification at any point in time.

**Full compliance:** The applicant can provide evidence (such as that stated in a contract/ MOU) that the subcontractor will provide records of MarinTrust compliant materials and certified finished products should the applicant require.

**3.4** The applicant shall have a signed agreement with all subcontractors handling the MarinTrust compliant marine ingredients and the certified finished products.

**Full compliance:** The applicant has a signed agreement in place with all subcontractors that handle MarinTrust compliant marine ingredients.

**3.4.1** This agreement shall ensure that the subcontractor has documented systems in place to ensure full traceability, segregation, and identification of the MarinTrust compliant marine ingredients and the certified finished products at every stage of handling in compliance with this MarinTrust CoC Standard.

**Full compliance:** The agreement specifies that the subcontractor has documented systems in place to ensure full traceability, segregation, and identification of the MarinTrust compliant marine ingredients and the certified finished products. Every stage of handling is stated to be in compliance with the MarinTrust CoC Standard.

**3.5** Where an applicant utilises the services of third-party transport companies, an agreement or equivalent documentary evidence shall be in place demonstrating that MarinTrust certified product integrity is ensured during transportation.

**Full compliance:** An agreement (or equivalent documentary evidence) is in place that specifies that the transport company keeps MarinTrust certified product separated and clearly identifiable from non-certified materials. The agreement also states that the transport container is kept clean and is free from any contaminants/ materials that may affect the quality/ safety of the product being transported.

**3.5.1** For bulk transported material, internal procedures and contractual agreements shall also include provisions that preclude the use of transport that may adversely affect the safety and/or integrity of any MarinTrust compliant marine ingredients materials due to the composition of a previous cargo.

**Full compliance:** In the agreement it is specified that the applicant has the right to refuse transportation should this adversely affect the safety and/ or integrity of the MarinTrust compliant marine ingredients. The third-party contractor will also agree to keep the condition of transport containers clean and free from contaminants.

## SECTION 4 – Use of the MarinTrust Certification Logo or Claim

<p><b>4.1</b> The applicant shall only use the MarinTrust CoC certification logo or claim if it has valid certification to this MarinTrust CoC Standard.</p>
<p><b>Full compliance:</b> The applicant has received certification and is now eligible to use the MarinTrust logo/ make claim after receiving permission from MarinTrust to do so. If this is the initial audit the applicant has not used the MarinTrust logo/ claim on any products, and they are aware they cannot do so until they are formally certified and received permission from MarinTrust to use the logo (see requirements for clause 4.1.1).</p>
<p><b>4.1.1</b> The applicant shall only use the certification logo or claim if it has documented evidence demonstrating that it has been granted approval to do so by MarinTrust - the standard owner.</p>
<p><b>Full compliance:</b> The applicant can provide documented evidence that they have received approval from MarinTrust to use the certification logo or claim.</p> <p>If this is the first time the applicant has applied for MarinTrust CoC certification the applicant has not used the MarinTrust logo/ claim on any products, and they are aware they cannot do so until they have received approval from MarinTrust.</p>
<p><b>4.2</b> The applicant shall follow the current MarinTrust logo guidelines for any logo used on their products and shall be verifiable.</p>
<p><b>Full compliance:</b> The applicant is fully compliant with the MarinTrust logo rules.</p>
<p><b>4.3</b> The applicant shall operate a secure system for the production, storage and application of product labels bearing the MarinTrust CoC logo/claim to ensure that only compliant finished products are labelled as such.</p>
<p><b>Full compliance:</b> The applicant will have a documented product management system (see clauses 1.4 – 1.6) and effective traceability (see Section 2) to ensure that the MarinTrust CoC logo/ claim is only used on compliant finished products. The production, storage, and application of product labels is secure and clearly managed.</p>

## SECTION 5 – Staff Training and Key Representative Responsibilities

<p><b>5.1</b> The applicant shall put in place documented programmes covering the training needs of all KEY staff to the successful adoption of this MarinTrust CoC Standard.</p>
<p><b>Full compliance:</b> There is a documented training programme and the applicant is able to demonstrate how this covers the training needs of all staff who are critical to the successful adoption of the MarinTrust CoC standard.</p>
<p><b>5.1.1</b> These documented training programmes shall include, as a minimum, identifying the staff training needs and the provision of training, to ensure that the staff have the necessary competencies to meet the requirements of this standard.</p>
<p><b>Full compliance:</b> A training programme is fully documented, all key staff have been identified along with training needs. The provision of training to staff has also been documented to demonstrate that staff are competent to meet the requirements of the MarinTrust CoC Standard.</p>
<p><b>5.1.2</b> The applicant shall review the effectiveness of all training provision on an annual basis.</p>
<p><b>Full compliance:</b> The applicant can demonstrate that they review the training programme on an annual basis and make improvements if necessary.</p>
<p><b>5.2</b> The applicant shall identify and appoint an individual (who also acts as the main contact for MarinTrust) who shall be responsible for all contact with the certification body and for responding to any requests for documentation or information related to CoC conformity.</p>
<p><b>Full compliance:</b> The applicant has identified and appointed an individual who shall be responsible for all contact with the CB.</p>
<p><b>5.3</b> The applicant’s CoC key representative shall oversee the training provision review of the competencies of its staff, at least annually or after an incident.</p>
<p><b>Full compliance:</b> The applicant’s CoC key representative can demonstrate that they oversee the training provision review of the competencies of key staff at least annually or after an incident.</p>

**5.3.1** Where additional training provision is required the applicant shall provide and conduct the relevant training in a time specified manner.

**Full compliance:** Additional training is provided in a timely manner.

**5.4** Records of all training provision completed and planned shall be maintained and be accessible.

**Full compliance:** Documents recording training provision completed and planned are maintained and accessible.

**5.4.1** An employee training record shall include as a minimum:

- The name of the trainee and signed confirmation of attendance;
- The date of the training;
- The title or course contents, as appropriate;
- The training provider.

**Full compliance:** Training records provide the necessary details.

**5.5** The applicant shall inform their certification body within 10 working days if they change their key representative member of staff and how they plan to induct a new member of staff to take over the role.

**Full compliance:** If there has been a staff change, the applicant informed the CB within 10 working days.



## SECTION 6 – Specific Requirements for Marine Ingredients sourced from a fishery that has been accepted into the MarinTrust Improver Programme

This section is only applicable if the applicant is handling a marine ingredient that is made from a raw material source from an accepted MarinTrust Improver Programme fishery. Details of all fisheries that are included within this Improver Programme can be located on the MarinTrust Website.

<p><b>6.1</b> The applicant shall be able to use marine ingredients from an improver programme if the following conditions apply</p> <ul style="list-style-type: none"> <li>• The Improver Programme is recognised by MarinTrust</li> <li>• The facility also uses marine ingredients that have been certified to the MarinTrust Factory Standard</li> </ul>
<p><b>Full compliance:</b> The applicant site has a policy in place and documented evidence to prove that improver programme products are only sourced from a fishery within the IP and that they also use marine ingredients that are fully certified to the MarinTrust standard.</p>
<p><b>6.2</b> The applicant handling marine ingredients from a MarinTrust Improver Programme, shall comply with the following</p> <p><b>6.2.1</b> Marine ingredients coming from the MarinTrust Improver Programme shall be clearly identified from all marine ingredients from fully certified MarinTrust products or non-certified products</p> <p><b>6.2.2</b> Marine ingredients coming from the MarinTrust Improver Programme shall be clearly segregated, both during processing and during storage, from all certified MarinTrust and non-certified products</p>
<p><b>Full compliance:</b> The applicant has a system in place that can effectively identify and segregate this type of marine ingredient from a fully certified MarinTrust marine ingredient or a non-certified product.</p>



**6.3** The applicant shall have a traceability system in place that will allow them to demonstrate the traceability back to the accepted improver programme fishery and accepted MarinTrust factory that is handling the improver programme fishery material

**Full compliance:** The applicant has a system in place that can effectively trace this type of marine ingredient back to an accepted improver programme fishery and accepted MarinTrust factory

**6.4** The applicant shall not use any logo from the MarinTrust programme on any product that contains ANY marine ingredients produced from the MarinTrust improver programme fishery. They will only be allowed to use an agreed claim to this improver programme if the material is made solely of MarinTrust improver material

**Full compliance:** The products produced in the facility are correctly labelled and the MarinTrust logo is only used on products that can trace back to marine ingredients that are fully certified to the programme. If products contain MarinTrust improver product material, the MarinTrust Logo cannot be used on these products. However, if the material is made solely of MarinTrust improver material then a claim to this MarinTrust improver programme can be made as long as the facility gets prior approval by the MarinTrust Secretariat

## Definitions

### Chain of Custody (FAO derived Definition):

*The set of measures which is designed to guarantee that the fishmeal and fish oil product put on the market and bearing the MarinTrust logo is really a product of designated origin and coming from the certified factory 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>4</sup>*

**Agent:** The agent works on behalf of either the seller or the buyer and facilitates the transaction (sale or purchase). The agent does not take ownership and can be seen as an alternative to having inhouse sales or purchase employees, they typically get paid a percentage of the activity. No activity, no cost.

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

**Broker:** A broker brings the buyer and seller together and gets a commission from either party or both. He/she does not take ownership. If the broker takes ownership, he/she becomes a principal and is thus a trader. A broker needs a good understanding of the products and applications and needs to have a good network. He/she does not need to have money, as he/she does not need to finance the goods, as he/she does not take ownership.

**Certificate Holder:** A company in the supply chain that has been formally Certified by the Certification Body as complying with the MarinTrust Standard and/or the Chain of Custody standard requirements.

**Certification Bodies:** The bodies appointed by MarinTrust to audit, assess and monitor compliance of applicants and certificate holders under the MarinTrust Programme.

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<sup>4</sup> FAO Guidelines for the Ecolabelling of Fish and Fishery Products from Marine Capture Fisheries, Rome 2005 + 2009



**Certified Claim:** A claim made by a certificate holder approved for use and licensed by the Standard Owner.

**Chain of Custody Standard:** The list of requirements that the Applicant must meet to claim Certification to the Chain of Custody Standard and /or use the Certified Claim.

**Key Data Element (KDE):** Data input required to successfully trace a product and/or its ingredients through all relevant CTEs.

**Marine ingredients:** Mainly fishmeal and fish oil derived from forage fish, but also marine organisms such as fish, krill, shellfish and algae

**MarinTrust Branding:** The name/s and logo/s as outlined in the MarinTrust Brand Guidelines

**MarinTrust Brand Guidelines:** The brand guidelines of MarinTrust, as set out in MarinTrust Brand Guidelines Document.

**MarinTrust Certified Factory:** An applicant factory who have successfully been certified as compliant with the MarinTrust Standard requirements.

**MarinTrust Chain of Custody (CoC) Certified:** An Applicant company or group of companies who have successfully been certified as compliant with the MarinTrust Chain of Custody standard requirements.

**MarinTrust Statement:** A statement that accurately describes the User's certification under the MarinTrust Programme

**Potential Applicant:** A company or group of companies in the supply chain that are considering applying for Chain of Custody Standard certification.

**Stage:** A handling / transfer point in the supply chain e.g. Packing, Processing, Distribution, Sales.

**Trader:** Person or company that buys and sells products. The trader has legal ownership of products, receives invoices and issues invoices and receives the full package of paper documentation. A trader may touch the product (trader with warehouse/storage tank) or a trader may merely trade the product without physically receiving the product, as the product typically goes directly from the manufacturer to a manufacturing plant. The trader needs to; have a good network, understand the market, finance the purchase and sales of products and, be familiar with the international transport of goods in order to find the best and the cheapest means of transport.