

MarinTrust Standard V3.0

Terms of Reference (ToR) Standard Development Process Requirements

Purpose

This document highlights the areas of the standard that have been reviewed for enhancement and lists the proposed changes required to move version V2.0 of the MarinTrust standard (ex IFFO RS) towards V3. The following document outlines the steps that were conducted when developing and agreeing the Terms of Reference for development towards Version 3 of the MarinTrust factory standard.

Background Information

The MarinTrust standard has been in existence since 2009 and is now on Version 2 Revision 0. The objectives of the standard as set by the Governing Body Committee were to:

- Eradicate Illegal, Unreported and Unregulated (IUU) fishery products being used as raw material for MarinTrust compliant marine ingredients (ex. Fishmeal and fish oil)
- Ensure that whole fish used in the production of marine ingredients is sourced from responsibly managed fisheries.
- Ensure the safe manufacture of marine ingredients.
- Have effective traceability systems in place to ensure that the MarinTrust compliant marine ingredients can be traced back to the approved MarinTrust raw material fishery.
- Fish By-products (or Trimmings) used in the production of MarinTrust Compliant marine ingredients must not come from fish species that are classified as endangered or critically endangered in the International Union for Conservation of Nature (IUCN) Red list, that are listed in the Convention on International Trade in Endangered Species (CITES) and must be derived from fish intended for direct human consumption.
- Certified factories must commit to having Environmental and Social Policies in place.

The MarinTrust programme has also developed a separate MarinTrust Chain of Custody standard designed to protect the integrity and provenance of all labelled MarinTrust Compliant marine ingredient as it passes through the global Supply Chain. The CoC V2.0 standard will be effective from November 2020 and will form an important part of the proposed MarinTrust Version 3.0 standard.

The current MarinTrust standard has over 150 certified factories utilising over 15 approved whole fish fisheries and over 100 approved by-product fish species. In addition, the Chain of Custody Standard has over 60 certified sites from more than 25 companies. The MarinTrust programme has a global reach and has certified applicants in 27 countries around the world.

To ensure that the MarinTrust Programme remains relevant and fit for purpose -it must be reviewed and revised on a regular basis and in accordance with the ISEAL Standard Setting Code and ISO 17065. In April 2018 the MarinTrust Governing Body Committee (GBC) ratified a proposal to review and enhance the standard towards Version 2 Revision 1, with enhanced strategic objectives. MarinTrust has been working on drafting these objectives, taking into consideration the different benchmark exercises with relevant norms and consultations with different actors in the marine ingredient value chain.

The ToR for V2.1 were presented at the last GBC meeting in May 2020 where it was approved by GBC members to be sent for a 30-day public consultation, subject to some changes proposed by the GBC regarding the GMP section of the standard. However, when the MarinTrust secretariat revised the ToR, the changes and revisions proposed for the standard were more significant than simple revisions, and as a result it is recommended that this should now be developed in to V3. Points that will strengthen the fisheries assessment criteria have also now been included.

Enhanced Key Objectives:

- To continue to meet the objectives set in the development of Version 2.0 of the MarinTrust standard
- To enhance and strengthen the MarinTrust Fisheries Approval Criteria for raw materials (whole fish and by-products) used for the production of compliant marine ingredients to promote more robust responsible fishery management.
- To enhance the traceability criteria to provide assurance to the traceability and integrity of the compliant marine ingredient.
- To enhance the MarinTrust Good Manufacturing Practices Criteria by taking into consideration good manufacturing practices for production that is intended for human consumption to ensure that marine ingredients are produced utilising relevant and robust practices for food safety.
- To promote more efficient marine ingredients production practices to reduce the environmental impact of the marine ingredients manufacturing process.
- To promote and create improved social and welfare benefits for all workers employed within the marine ingredients manufacturing sector.
- To evaluate extending the scope to include human rights criteria for vessels supplying whole fish to the marine ingredients manufacturing sector.
- To ensure that MarinTrust Version 3 remains relevant, robust and fit for purpose.

Key Opportunities for the MarinTrust programme to consider:

1) Technology

- Use of emerging technology [e.g. Key Data Element (KDE) transfer through the supply chain to enable the use of a blockchain or an equivalent system] to source the origin of a certified MarinTrust marine ingredient efficiently and accurately.

2) Standard Collaboration and recognition

- Ability to make MarinTrust certification the “go to” Standard, through better collaboration with regulatory authorities and other standards (e.g. GFSI or GSSI recognised standards)
- Recognise and utilise existing processes to source, produce and trace products, which are underpinned by legislation and internationally recognised norms, to avoid duplication of effort and maximise efficiencies e.g. US and EU traceability regulations, and internationally recognised norms including the UN Guiding Principles and FAO and ILO guidelines and conventions.
- Explore the potential for working in collaboration with by-product raw material providers to allow better traceability for marine ingredients produced from by-products.

3) Adding Value

- Enhance opportunities to educate the supply chain about how rigorous the MarinTrust programme is.
- Provide training for an applicant’s relevant staff to understand the standard’s objectives and its benefits to their operation.
- Improve the reputation and value of by-products through improved traceability

4) Quality Assurance

- Improve assessment consistency and efficiency. Provide a risk assessment framework for use by CBs to determine risk status of plant/factories so that organisations that have successfully attained the standard could be deemed to be low risk, resulting in reduced audit associated costs.
- Identify ways of detecting fraudulent activities (e.g. adulterations and substitution) by introducing more rigorous traceability system and mass balance checks within the standard and systems to handle non-conforming product once this is detected
- Use of additional product authenticity testing methodologies to provide greater assurance on origin data
- 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 ISEAL Codes.

5) Social Accountability

- To explore the feasibility of expanding the scope of the MarinTrust social criteria to the vessels providing whole fish raw material to the plant and ascertain how these may be met by the existing programmes.
- To identify the different social performance indicators within the production site to measure improvement and to define the social outcomes within the standard.
- Revise the Social Conformance Criteria to consider the most relevant and current International Labour Organisation (ILO) conventions to assess the social and welfare rights of Employees within the Marine Ingredient producing factories.

6) Environmental Accountability

- To identify the different environmental performance indicators within the production site to measure improvement and to define the environmental outcomes within the standard.

Version 3 Key Development Activities:

- To review the intent of the MarinTrust fishery approval criteria for raw materials (whole fish and by-products) versus the FAO Code of Conduct for Responsible Fisheries.
- Review the design of the Management Framework criteria to assess the extent to which the key goals of the standard are being achieved in the Unit of Assessment (UoA).
- Reformat the by-product criteria methodology to better reflect what is being asked in the standard and develop an IUU risk assessment to be included in the by-product methodology
- To benchmark the fishery approval criteria for whole fish against the Marine Stewardship Council (MSC) fishery standard to identify possible criteria and guidance alignments for equivalence.
- To review the relevancy and accuracy/effectiveness of the risk-based approach used in the fishery approval criteria (PSA tables)
- To review the fishery approval criteria following the guidelines of the Global Seafood Sustainability Initiative.
- To align the traceability criteria (Section 2) with the new MarinTrust Chain of Custody Standard V2.0
- To introduce and implement a Key Data Element List for enhanced traceability following the Global Dialogue for Seafood Traceability (GDST)

- To review the MarinTrust Good Manufacturing Practices Criteria (Section 3) taking into consideration manufacturing production practices for direct human consumption from standards that are recognised by the Global Food Safety Initiative (GFSI) while maintaining recognition of GMP+/FEMAS.
- To review the current Social accountability criteria (Section 5) to take into account the most updated International Labour Organisation ILO conventions to assess the Social and Welfare Rights of Employees within the Marine Ingredient Producing Factories.
- To review existing Social accountability criteria used by Marine Ingredient Producing Factories and identified best practice for vessels supplying whole fish raw material to the factories and to trial their inclusion in v3 of the Standard.
- To review the current Environmental accountability criteria (Section 6) to consider the inclusion of criteria that records and allows effective management of waste, effluent, energy usage and Green House Gasses (GHG) emissions including responsible use of water.
- To define and introduce SMART social and environmental performance metrics that can be easily implemented and are auditable in a marine ingredient production facility to allow easy access and verification.

Rationale and Risk Analysis for the Implementation of Version 3

There is a diversity of companies and stakeholders, resulting in a variety of expectations and needs from the MarinTrust standard, especially as the MarinTrust programme scales up globally.

Any changes to the standard shall be assessed based on three main priorities:

Accessibility – To reach more markets and provide access to a greater volume of MarinTrust compliant marine ingredients, having a factory standard that is accessible, regardless of business size or geographic location, is key. Accessibility can be enhanced by working closely with our supply chain partners across the globe, tailoring the standard and supporting documents to their practices, taking out redundant elements, making use of new technology, and aligning with other internal and external requirements.

Rigour – The essence of the value proposition of the MarinTrust standard is its credibility and assurance process. Product integrity risks and new risks should be monitored and managed. Where needed, changes to the standard should be implemented to enhance the rigour. Other changes should be assessed to ensure they do not jeopardise the credibility of the programme. As the MarinTrust programme scales up, enters new markets, and with the industry evolving accordingly, new risks will appear and will need to be managed.

Relevance – For the long-term relevance of the programme, the MarinTrust factory standard must continue to meet with supply chain expectations for the next generation of MarinTrust certified products, respond pro-actively to changes and carefully maintain the balance between accessibility and rigour.

Detail the development areas for Version 3.0 of the MarinTrust Factory Standard

The Technical Advisory Committee (TAC) with the support of the Standards Steering Committee (SSC), Social and Ethical Committee (SEC) and the Fisheries Development Oversight Committee (FDOC) which are made up of individuals who have the key skills required to review the different sections within the MarinTrust Factory standard as follows:

- Fishery Conformance criteria to take into account GSSI and MSC alignment. This will be completed by linking the criteria to the GSSI standard criteria and MSC criteria. The guidance for the CB assessors will then be aligned with the various standards.
- Conformance criteria to take into account TACCP and VACCP requirements to work to mitigate fraudulent acts and enhance traceability assurance within the fishmeal and fish oil production and consequently within the supply chain entity.
- Conformance criteria to take into account Key Data Elements (KDEs) recording to work to mitigate the use of Illegal, Unreported and Unregulated (IUU) raw material in a certified MarinTrust plant.
- Conformance criteria to take into account more robust and verifiable mass balance calculations to ascertain the volume of compliant MarinTrust material as it is produced and processed by the fishmeal and fish oil certified plant and how these volumes should be recorded and used to give even greater reassurance to the supply chain.
- Conformance criteria to introduce better controls on the use of the MarinTrust Logo and any associated claim; to ensure any claims can be managed effectively; and to determine, in instances where non-compliant MarinTrust fish meal and fish oil is discovered, what actions should be taken by the producer and consequently the supply chain.
- Review conformance criteria to take into account the requirements of ILO conventions (e.g. 29, 105, 138 and 188), to ensure that the social and welfare rights of employees within the full MarinTrust certified site including the vessels providing them with whole fish raw material. These criteria will also provide a mechanism to identify supplier vessels that do not comply with ILO social and welfare requirements.
- Conformance criteria to consider key environmental considerations, to ensure that the environmental impacts (e.g. waste management, Green House Emissions) of all certified MarinTrust sites are mitigated wherever possible, and records are maintained to show adequate due diligence.
- Conformance criteria from V2.0 that are deemed to be duplicative or inconclusive from the site visits conducted to date and the standard review shall be revisited. Where possible the existing MarinTrust Factory standard requirements will be streamlined to ensure that V3.0 is future-

proofed and credible until the next standard revision towards V4.0 within the 5 years' time from the date of V3.0 publication.

- The MarinTrust Standard V3.0 shall be pilot tested on a specified number of fisheries and fishmeal sites to ensure that the evaluation and auditability of the new criteria meets with both the ISEAL assurance code and ISO 17065 certification protocols.
- In accordance with ISEAL recognition, a full impact assessment on all current MarinTrust Standard holders will be conducted at the final stages of the development of V3 to determine what effect these proposed new changes will have on their capability to comply. If accessibility to the revised standard is challenging for a significant proportion of the current MarinTrust certificate holders, a credible and robust transition plan will be proposed, to ensure they have time to comply. However, extensive trials and full stakeholder engagement should, mitigate this.
- A full set of auditor training tools shall be developed to ensure that all MarinTrust auditors and Certification Bodies that will be required to audit and certify to the new standard can do so with credibility and consistency.
- All MarinTrust auditors shall be required to prove competency in assessing to the revised MarinTrust standard by the sitting and passing of an examination to prove understanding of the new conformance criteria.

Certification Assurance and Standard development

The development towards V3.0 will be in alignment with ISO 17065 and follow the ISEAL codes to maintain full recognition of the programme by the ISEAL Alliance.

Proposed MarinTrust Version 3.0 Standard development process

The development of V3.0 of the MarinTrust Standard shall be in line with the MarinTrust Standard Development procedure and shall include, but it not limited to, the following elements:

- Draft ToR agreed by MarinTrust TAC and reviewed by MarinTrust Governing Body Committee (GBC)
- Public Summary developed for publication parallel to the ToR.
- ToR placed in Public Consultation for 30 days to seek stakeholder input from those directly and indirectly affected by this proposed new version
- Final ToR approval by MarinTrust GBC
- Upon sign off, the decision to carry out the development of a new standard will be publicly announced and made available on the MarinTrust website.
- Complaints regarding the scope of v3.0 of the standard in this context shall be considered as part of the feedback and shall be recorded and managed in accordance with the public consultation process
- Review of key stakeholders to ensure adequate representation of all relevant groups.
- Conduct trial on the Draft of the Standard on the fishery and factory criteria (Europe and Latin America)
- Draft of Standard updated based off trial findings and agreed by the MarinTrust TAC

- Draft of Standard agreed by MarinTrust GBC
- Agreed Standard placed in Public Consultation for 60 days to seek stakeholder input and engagement
- Conduct trial on the agreed standard on the by-product fishery and factory criteria (Asia and Europe) and the whole fish and factory criteria (Americas)
- Final Approval of MarinTrust V3.0 by MarinTrust TAC
- Final approval of MarinTrust V3.0 by MarinTrust GBC for launch
- Publication of the MarinTrust V3.0 standard, and circulation to key stakeholders.

The development of Version 3.0 of the standard will take up to 24 calendar months from the point where the ToR is approved by the MarinTrust GBC. It is aimed for this standard to become available to supply chain entities by August 2022 and a transition plan for existing MarinTrust Certificate holders will be developed to enable them time to meet the new requirements. It is important to note however, that due to the novel COVID-19 virus, these timeframes may be extended due to the travel restrictions and guidance put in place which could affect the need to conduct pilots for the new standard criteria.

Proposed Technical Competencies for the Version 3.0 Technical Advisory Committee (TAC)

On agreement of the Version 3.0 ToR the MarinTrust secretariat will seek and consult with its committees made up of key individuals who can offer the correct level of competency and expertise to develop the standard to v3.0 and create a new set of credible conformance criteria for the for the development of the current version of the MarinTrust standard.

The proposed committees will need to be able to demonstrate expertise and competency in covering the following key areas:

- Traceability Systems and Mass Balance calculation
- Good manufacturing practices
- Product Authenticity testing
- Environmental Assessment Impacts
- Social and Welfare Assessment Criteria
- Standard setting requirements to meet ISO 17065 and ISEAL criteria
- Fishery management and assessment methodology