

Guidelines for Certification Bodies Managing Applications to Certification for the MarinTrust Programme (Factory Standard, CoC Standard, and Improver Programme)

Introduction

This document is provided for guidance to all registered and prospective CBs to ensure that all applicants and existing certificate holders of the MarinTrust Certification Programme are liaised with and handled in a professional and consistent manner.

Please note that these guidelines relate to certification (or acceptance in case of the Improver Programme) against any of the following key components of the MarinTrust programme:

- Factory Standard
- Chain of Custody (CoC) Standard
- Improver Programme

Herein, we use the term “MarinTrust Standards” to refer to both the factory standard and chain of custody standards.

1.0 Enquiries and Requests for Applications

All enquiries and requests for certification to the MarinTrust programme shall initially be directed to an appropriate and trained administrator within the MarinTrust Secretariat.

Full details of the audit including the standard requirements, current status, and scope of audit, time frame and proposed audit charges, shall be discussed with the applicant by an appropriately trained staff member who has full knowledge of the MarinTrust Certification Programme. An information pack shall be forwarded to the potential applicant by MarinTrust containing:

- Current, relevant application Form
- Estimated Cost
- Programme Requirements
- CB competency statement and selection options

2.0 On Receipt of an Application

Only approved applications received from the MarinTrust secretariat shall be processed. In the case that a completed application form is submitted to the Certification Body directly by an applicant, the appropriate staff member shall send the application form to the MarinTrust Secretariat within 24 hours to be processed and approved prior to proceeding with the application and certification process.

On receipt of the approved application form, the applicant's details shall be entered into a MarinTrust database or document to show when it was received and what the planned time frames will be for the progression of their certification with their selected CB.

The submission of a completed application will act as a contract between the applicant and CB confirming the applicant's commitment to abide by the CBs Certification Process Protocols that have been set out as part of their Accreditation Requirements to certify against the MarinTrust programme.

On receipt of an approved application form the CB's Staff shall conduct a review of the application to establish the most appropriate audit plan for the applicant. Where necessary, the CB may contact the applicant or liaise with an appropriate member of the CBs audit team to clarify information to assist in the preparation of the audit plan and proposed audits costs.

The CB shall issue this audit plan and audit costs based upon the risk factors identified below to the applicant for agreement within 10 days of receiving the application form from Marin Trust Secretariat:

- Applicant Size and Technical Resource:
 - Production Area
 - Employees
 - Product Lines
 - Turnover

- Prior knowledge of the applicant to the MarinTrust Certification Programme.

Once accepted the invoice for the proposed audit work that will be required for Certification to the MarinTrust Programme shall be issued. Once payment is received from the applicant the CB shall progress to arranging the audit.

3.0 Arranging the Audit

Prior to a factory audit, MarinTrust fishery and / or by-product assessments should be conducted to the latest version of the MarinTrust fishery assessment and by-product assessment procedures.

All initial audits shall be conducted at a mutually convenient date following discussion with the applicant (within no more than 1 year of the application being submitted), taking into account the

requirements of the MarinTrust Programme regarding surveillance, re-certification audits, details of the applicant, their customers and the product in question.

All surveillance audits for existing certificate holders of the programme should be carried out within a specific period of time after their initial audit, which shall usually be within a 12-month time period. Any audit that does not take place in accordance with this surveillance window shall be recorded and reported to the MarinTrust Secretariat and raised with the Governing Body Committee (GBC) if necessary, with the reasons why this audit did not occur according to the programme's requirements.

All audits shall be scheduled and coordinated by the CB. The audit shall be allocated to an experienced, approved MarinTrust auditor for the CB who has relevant industry knowledge and expertise for the given scope of the applicant. Should an auditor conduct 3 consecutive audits at the same site plant, the same auditor may not be used on the 4th audit without the express permission of the MarinTrust Secretariat.

Email confirmation shall be sent to the applicant detailing the audit date; time and audit agenda together with a controlled copy of the CB's own Certification Protocols for the MarinTrust Programme.

When subcontracted auditors are used, an authorisation email to conduct an audit shall be forwarded to the nominated auditor and the auditor's name entered in the applicant's file. Along with this authorisation email the applicant's full audit plan schedule will be attached, which will highlight the date(s) and site(s) that will need to be audited by the subcontracted auditor.

The subcontracted auditor shall have the above authorisation, where applicable, the audit plan and relevant audit report form for the audit site at the agreed time and date of the audit.

Overseas travel arrangements including flights, hotels and car hire, as required, shall be organised and agreed by the CB in consultation with the applicant and the auditor prior to the allotted audit date.

4.0 Audit Standards and Scope

Audits are to be carried out using the requirements of the MarinTrust Programme and the relevant audit report checklist issued by the CB, with prior approval of MarinTrust. *It is the responsibility of both the applicant and the CB to ensure they have the most up-to-date copy of the relevant standard under the MarinTrust programme as published on the MarinTrust website.*

Note: In all cases, legal requirements will take precedence over any requirements of the standard.

In the event where additional audit requirements are identified e.g. checking compliance with product specifications, complaints investigation etc., the scope of the applicant's audit plan can be modified. Any modification to the scope shall be subject to the agreement by MarinTrust but at no stage can

relevant elements of the MarinTrust standard be omitted. It shall be noted that if these additional audit requirements are outside the scope of CB's Accredited certification activities the audit process of the applicant **cannot** continue without liaison between the CB, the Accreditation Body and MarinTrust Secretariat.

5.0 Pre-audit Requirements

5.1 MarinTrust Applicants

A factory applicant shall be requested to submit details of the whole fish fishery and by-product fishery that are used in the process to ensure that they have an Approved Raw Material for the production of Compliant MarinTrust Marine Ingredients such as Fishmeal and Fish Oil. In addition, all factories wishing to apply shall either have a valid Good Manufacturing Standard Certificate in place which complies with the International Feed Ingredient standard such FEMAS or GMP+ or benchmarked equivalent as recognised by the MarinTrust GBC. The facility shall need to be able to demonstrate that they are legally licenced in the country of operation and comply with social and environmental requirements of the national regulatory authorities that oversee their operation.

These will be used to enable a pre-evaluation of the operation to be conducted by the CB's approved auditor before the planned date of the audit. If any are found not to be compliant, the applicant will be informed that these prerequisites shall be required if they are to be certified to the MarinTrust standard.

If the applicant factory does not hold a valid accredited Good Manufacturing Standard Certificate, such FEMAS or GMP+ or benchmarked equivalent, they shall need to be informed that they will need to complete the full manufacturing requirements section of the standard which shall add at least one additional day onto their audit time.

5.2 MarinTrust Chain of Custody Applicants

For applicants to the Chain of Custody (CoC) Standard, facilities 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. The facility shall be legally licensed in the country of operation. The applicant's facility shall provide evidence that they satisfy the following minimum entry criteria for the scope under certification:

- Food safety certification – GFSI benchmarked schemes if handling certified marine ingredients for human consumption. GMP+ or equivalent if handling marine ingredients for animal feed.
- Social accountability – meet the requirements of the national regulatory authorities that oversee their operation.

- Environmental accountability – meet the requirements of the national regulatory authorities that oversee their operation.

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. Please see the MarinTrust CoC Standard for further information.

The applicant shall be able to use marine ingredients from an improver program if the following conditions apply; the improver program is recognised by MarinTrust, and the facility also uses marine ingredients that have been certified to the MarinTrust Factory Standard.

5.3 Self-assessment

All the standard requirements of the MarinTrust Programme shall be reviewed by the applicant prior to each audit with a view to identifying actual/potential non-conformances and initiating the appropriate corrective action. Conducting a self-assessment to each clause would be advisable. These reviews shall be part of the applicant's own documentation and they shall conduct an internal audit review plan of all their policies and procedures at least every 12 months.

6.0 Conducting MarinTrust audits

For detailed auditing procedures please refer to document A4 "Conducting MarinTrust Factory and Chain of Custody Audits by Registered Certification Bodies".

Audits of most types of operation shall be conducted in their own language, where possible, but all reports shall be written in English. Where audits cannot be conducted in the applicant's own language Certification Bodies shall provide/offer an **independent** translator/interpreter to attend. The use of a translator/interpreter provided by the applicant is not allowed due to impartiality risks.

7.0 Audit Certificates

The issuance of an audit certificate shall be subject to the approval of the CB Senior Manager who oversees all Accredited Certification Programmes. Please refer to document A5 – Issuing and Withdrawal of Certificates procedure, for details.

The certificate shall remain the property of the CB and shall be issued subject to the applicant complying with the CB Certification Protocols, a copy of which is provided with the application documentation.

The certificate should only be sent to the applicant once all payment to MarinTrust with regards to administration standard fees has been cleared. The certificate should be sent electronically to the applicant and MarinTrust (in order to publish it in the official website) within 1 working day of the issue of the certificate and an original copy should be arranged to be sent by post to the applicant within 2 working days of the issue of the certificate.

In the event there are substantial changes to the premises or products, these shall be notified in writing to CB. The certificate may be withdrawn in the event changes occur, which shall affect the company's certification status.

8.0 Records

The CB shall review the applicant's file 30 days after the relevant certification committee meeting to ensure that all records, minutes and certificates are in place. The following records relative to audits and certification decisions shall be maintained, either as hard copy or on electronic file, for a period of 5 years if the certification has now lapsed or moved to another CB. If it is a current certificate, records for the previous two certification cycles shall be maintained.

The applicant shall be expected to keep the following records for the same time period:

- Application form.
- Site visit confirmation letter and site visit schedule.
- Authorisation to the auditor to conduct the audit, where applicable.
- Audit report forms.
- Letter detailing non-conformance, where applicable.
- Response from applicant on corrective actions.
- Confirmation from auditor of close out of non-conformances.
- Minutes of certification meetings / reviewers' comments.
- Letter notifying applicant of certification decisions.
- Typed audit report.
- Certificate and acknowledgement.

The applicant's file shall be reviewed according to an Internal Review Programme scheduled and conducted by the CBs Programme Manager.

AMENDMENT LOG

DATE	ISSUE	AMENDMENT	AUTHORISED BY
13/11/2015	1.1	IFFO RS logo heading, footer.	Francisco Aldon
27/11/2017	1.7	Update of wording throughout the document from “assessment” to “audit”.	Francisco Aldon
27/11/2017	1.7	Deletion of “Length of the On-site” has been deleted from point 6.0, second paragraph	Francisco Aldon
27/11/2017	1.7	Update of all of the levels of non-conformity in section 6.0, Audit procedures	Francisco Aldon
27/11/2017	1.7	Updating of section 8.0 Audit Frequency to ensure that it is clear the frequency and length of an audit is not on a risk based term.	Francisco Aldon
27/11/2017	1.7	Rewording of “21 working days” to “28 calendar days” I section 10.0 Non-conformance follow up.	Francisco Aldon
27/11/2017	1.7	Section 11.0, fifth paragraph, rewording of paragraph to “shall also be sent to the IFFO RS Standards Administrator and or IFFO RS secretariat with the same time period of no longer than 3 working days after the Certification Meeting. The Head of Operations shall use these audit reports for standard consistency monitoring purposes also.”	Francisco Aldon
27/11/2017	1.7	Section 11.0, final paragraph, change from “The applicant paying for the assessment shall be regard as the applicant” to ‘The main contact as indicated in the IFFO RS application form	Francisco Aldon
27/11/2017	1.7	Rewording of final paragraph in section 8.0 to “In some cases, where the marine ingredient is not produced continuously, the Re-certification audit shall take place while the factory is producing”	Francisco Aldon
Version 2 edits (MarinTrust conversion)			
01/10/2020	2.0	MarinTrust Header & Footer inserted	Libby Woodhatch
01/10/2020	2.0	Wording throughout document amended to read ‘ <i>MarinTrust Programme</i> ’	Libby Woodhatch
01/10/2020	2.0	Inclusion of paragraph 2 and 3 in the introduction.	Libby Woodhatch

01/10/2020	2.0	Inclusion of wording 'In the case that a completed application form is submitted to the Certification Body directly by an applicant, the appropriate staff member shall send the application form to the MarinTrust Secretariat within 24 hours to be processed and approved prior to proceeding with the application and certification process.' In section 2.0, first paragraph	Libby Woodhatch
01/10/2020	2.0	Further guidance added to the final 3 paragraphs of section 2.0 for preparation of audit.	Libby Woodhatch
01/10/2020	2.0	Inclusion of 'Prior to a factory audit, MarinTrust fishery and / or by-product assessments should be conducted to the latest version of the MarinTrust fishery assessment and by-product assessment procedures' in section 3.0, paragraph 1.	Libby Woodhatch
01/10/2020	2.0	Inclusion of '(within no more than 1 year of the application being submitted),' to section 3.0, paragraph 2.	Libby Woodhatch
01/10/2020	2.0	Inclusion of 'Should an auditor conduct 3 consecutive audits at the same site plant, the same auditor may not be used on the 4 th audit without the express permission of the MarinTrust Secretariat.' to section 3.0, paragraph 4	Libby Woodhatch
01/10/2020	2.0	Inclusion of 'The facility shall need to be able to demonstrate that they are legally licenced in the country of operation and comply with social and environmental requirements of the national regulatory authorities that oversee their operation.' in Section 5.1, paragraph 1.	Libby Woodhatch
01/10/2020	2.0	Addition of section 5.2 to include specific guidance on Chain of Custody	Libby Woodhatch
01/10/2020	2.0	Addition of section 5.3, Self-Assessment	Libby Woodhatch
01/10/2020	2.0	Amendments to section 6.0 to remove specific guidance of conducting the audit. This specific guidance is provided in	Libby Woodhatch

		appendix A4 – Conducting MarinTrust Factory and Chain of Custody Audits by Registered Certification Bodies’	
01/10/2020	2.0	Sections 7.0 – Notification of Serious Food Safety / Legality issues, 8.0 – Audit frequency, 9.0 – Initial Audit Reports, 10.0 Non-conformance follow-up and 11.0 – Distribution of Final Audit Report removed and included in appendix A4 – Conducting MarinTrust Factory and Chain of Custody Audits by Registered Certification Bodies’	Libby Woodhatch
01/10/2020	2.0	Removal of certificate specific information and inclusion of additional guidance in section 7.0 – Audit Certificates first paragraph ‘Please refer to document A5 – Issuing and Withdrawal of Certificates procedure, for details.’	Libby Woodhatch
01/10/2020	2.0	Inclusion of wording in section 8.0 – records, paragraph 1.	Libby Woodhatch