

# Conducting MarinTrust Factory and Chain of Custody Audits by Registered Certification Bodies

## Purpose

The contents of this document are to ensure that all MarinTrust Factory and Chain of Custody (CoC) Audits are conducted and reported in a consistent manner.

## Scope

This document states the procedure to be applied to all MarinTrust Factory and CoC Audits carried out by all registered CBs. Herein, we use the term “MarinTrust standards” to refer to both the factory standard and chain of custody standards.

## 1.0 Pre-audit Process

The CBs Programme Manager/Administrator will be responsible for conducting the Pre-audit Check by contacting the applicant directly. The Programme Manager/Administrator will, upon receiving the MarinTrust application form of an applicant from the MarinTrust secretariat, contact the applicant by telephone/email within 5 working days and confirm that they are in a position to proceed to initial audit by ensuring that they are:

- In possession of all the relevant Standard documentation;
- Aware of and understand the relevant Standard prerequisites and clause requirements;
- Aware that the application form acts as a contract between the CB and the applicant;
- Able to demonstrate compliance with the requirements of the MarinTrust Standard or MarinTrust CoC Standard clause requirements during the audit visit by the completion of a detailed review and/or self-assessment;
- Able to provide the allocated auditor the necessary access to all areas required to be reviewed on the agreed audit date.

The Programme Manager/Administrator may take the opportunity during this pre-audit check to explain and agree additional interpretation requirements of the standard with the applicant.

If deemed necessary, the relevant Programme Manager/Administrator may request the allocated auditor to carry out this pre-audit check.

If the pre-audit check is successful, the audit date along with a site audit schedule, (developed in conjunction with the auditor if applicable), will be confirmed in writing to the applicant. The MarinTrust secretariat/Standards Administrator will receive a monthly Certification Tracker indicating the audit schedule from each MarinTrust registered Certification Body. This shall include as a minimum:

- Applicant company name
- Applicant site name
- Audit type
- Allocated Auditor
- Audit conducted date
- Standard type
- Certificate number (for existing certificate holders)

If the outcome of the pre-audit check is unsatisfactory this information will be entered in the applicant's file by the Programme Manager/Administrator and the Programme Manager will re-contact the applicant at an agreed time to reset the date of the Audit.

**The pre-audit process for audits subsequent to the initial audit** - termed here as "Re-audits" - does not include a pre-audit Check. The Programme Manager /Administrator will be responsible for scheduling audits and notifying the approved auditor. Where relevant, this schedule may be amended as necessary to take into account changes in the audit frequency required by any amendments to the MarinTrust standards. The auditor will be responsible for the carrying out of the audit on the agreed date. Where an audit cannot be conducted on the agreed date the Programme Manager/Administrator shall ensure that the audit is not re-scheduled outside its re-certification due date as stated on the Certificate of Compliance.

*Note in the event of an extraordinary event being declared, the extraordinary event procedure shall take precedent over audit frequency requirements*

For all audits the Programme Manager/Administrator will confirm in writing to the applicant the agreed audit date and location, including the site audit schedule for the audit, a copy of which will be sent to the auditor along with authorisation, in the form of an email to conduct an audit. A copy of this information shall be held on the applicant's individual file.

All auditors, whether for initial audit or re-audits, are required to declare to the CB any situation, which may give rise to a conflict of interest with respect to locations, they have been

requested to audit. Each auditor must confirm that they will notify the CB should such a situation arise through a signed Conflict and Confidentiality Declaration form.

**CBs own Registered Auditors** - The auditor will bring with them to the on-site audit the agreed site audit schedule, which they must endeavour to follow as closely as possible.

**CBs Sub-contracted Registered Auditors** - The Sub-contracted Auditor will bring with them the confirmation email sent to them from the Programme Manager/Administrator, advising of the audit date, time, facility address and contact, along with the authorisation to conduct an audit to the MarinTrust standards. This will serve as identification and validation of the auditor, to carry out the audit.

## 2.0 Audit Procedures

### 2.1 General information

The audit will be conducted against the current issue of one of the MarinTrust standards and will use an approved audit report format. 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.

All audit evidence will be recorded as *Yes, No, or Non-applicable (N/A)* and substantiated with both positive and/or negative evidence to each clause of the MarinTrust Standard or CoC Standard. All areas, covering only those marine ingredients (fishmeal and fish oil) products and processes that are from approved sources stated within their application to the MarinTrust standards, must be assessed. If not, reasoning must be noted in the final report. If the auditor is unsure how to score the evidence collated during an audit to a specific clause within the MarinTrust standards, they must consult with their CBs for further guidance before the clause can be rated.

Initial Audits. The Auditor shall ensure that all applicable areas of the MarinTrust standards are assessed.

Surveillance Re-certification Audits. The auditor will take into account non-conformances and results from previous audits and may focus more attention on areas of concern ensuring always that all applicable areas of the MarinTrust standards have been assessed.

The auditor after 3 consecutive audits of a single plant may not be used on the 4<sup>th</sup> unless they have been given permission by MarinTrust.

The on-site audit schedule shall consist of seven elements and is based on ISO 17021 requirements (applicable to audits against the Factory and CoC Standards):

- An Opening Meeting.
- A review of the documented Traceability Systems back to the Approved Raw Material.
- Production Facility Inspection – to review practical implementation of the Traceability Systems and interview of specific personnel used to control these systems.
- Review of the Production Facility Inspection- to verify and conduct further document checks to verify compliance with the reviewed systems.
- Final Review of Findings - preparation for the closing meeting.
- A Closing Meeting to discuss compliance with the MarinTrust or CoC standard.

An opening meeting shall always be conducted with the applicant to confirm, as necessary, the scope of the audit visit to determine the availability of relevant personnel, access to required areas, confidentiality of information, and reporting process.

The auditor shall always complete the approved audit report form for the respective MarinTrust standard to ensure all aspects of the standard are addressed.

Sufficient notes will be taken during the audit to demonstrate an identifiable audit trail against each clause assessed. These notes will include as appropriate reference to location, product identification, equipment or documents used, compliance with and availability of the applicant's own documented policies and procedures where these form part of the MarinTrust Standard or MarinTrust CoC Standard requirements. All notes taken during the audit will be submitted along with the audit report to the CB's Programme Manager/Administrator.

The duration of the single on-site audit towards the MarinTrust Standard shall typically be up to 1.5 days for those who hold a valid GMP+ certification with a significant proportion of the time spent on reviewing Traceability Based Systems and assessment of its practical implementation, and 2 full days for those without GMP+ certification who must therefore comply with section 3.2 of the MarinTrust Standard.

The duration for a typical MarinTrust Chain of Custody standard audit shall take up to 1 day. However, more time may be required for facilities with multiple sites, or that use subcontractor facilities.

Following all audits, the CB shall also complete and submit the MarinTrust certification timeline tracker to applicant and the MarinTrust secretariat.

## 2.2 Conformance definitions

Each of the clause requirements of the MarinTrust standards shall be designated with one of the following conformance levels as defined by the auditor guidance for the respective standard.

- I. **Full compliance** definition – The applicant meets the standard requirements.

At the initial certification audit **all non-compliances shall be addressed** in an effective action plan and closed off or downgraded prior to certification.

- II. **Minor non-conformance definition** – Any non-conformity which does not adversely affect the health or safety of a product, i.e., where absolute compliance to the statement of intent has not been met but on the basis of objective evidence the conformity of the product is not in doubt.

Where a Minor Non-conformance is identified at the initial certification, the CB shall not issue a certificate until this has been addressed in an effective action plan that has been agreed by the CB.

### Definition of an effective action plan

For an action plan to be deemed as effective it shall address the following key areas:

- An appropriate time frame to address and resolve the non-compliance shall be given
- A root cause analysis of why the non-compliance occurred
- Identify the actions required to ensure that future non-compliances shall not occur (to include changes to policy and procedures)
- An appropriate person to oversee that the non-compliance has been resolved shall be identified.

At an annual surveillance, a raised minor non-conformity does not prevent the applicant from maintaining its certification to the MarinTrust standards. An action plan is presented, and this shall be a focus of the subsequent surveillance audit. If subsequently the organisation is deemed to still fall short of full compliance, the auditor will upgrade the non-compliance and raise a major non-conformity. Corrective action will then be required before certification can be maintained.

*Note - The only exception to this rule is under circumstances where a minor non-conformity is raised due to records not being maintained for a sufficiently long duration. In these circumstances, the minor non-conformity will remain minor as long as records continue to be built up. This is to reflect the impossibility of creating 3 years of records in 1 year.*

- III. Major non-conformance definition** – Any non-conformity other than critical, which cannot be completely eliminated by re-work or reduced to a minor non-conformity. In addition, this could also be where a requirement of the MarinTrust standards have been addressed but there is insufficient evidence to demonstrate that it has been properly controlled or implemented. For example, the traceability system is found to be inadequate to meet the requirements of the statement of intent or any clause of the Standard.

All major non-conformances must be closed off or downgraded to a minor with an agreed action plan before the applicant can be certified to the MarinTrust standards.

If the CB cannot close off or down grade a major non-conformance in a period of 3 calendar months for new applications or 1 calendar month for an annual surveillance, from the point at which it is raised, the CB shall instigate a full re-audit.

At this point in the process, where it is an existing client, their MarinTrust or CoC certificate shall be suspended until the re-audit has been conducted. If the re-audit determines that no non-conformances were found, the client's certificate shall be reinstated. If there is persistent failure to meet the requirements of the MarinTrust Certification the certificate may be completely withdrawn. Please refer to the MarinTrust issuing and withdrawal of certificates procedure (A5) for further guidance.

**Downgrade definition** – where the applicant can provide evidence which challenges the auditor's original decision on the grading of a non-compliance sufficiently to allow a lower grading on the non-compliance to be issued.

- IV. Critical non-conformance definition** – Any non-conformity which may result in hazardous or unsafe conditions for individuals. In addition, this could also be a legal or regulatory violation, or a complete marine ingredient safety failure to implement a requirement of the MarinTrust Standards resulting in a programme integrity risk. For example, the auditor provides evidence to show that the marine ingredients labelled, or intended to be labelled, as compliant were found not to have originated from an approved fishery or by-product of the MarinTrust programme, or from an officially recognised fishery that has been accepted into the MarinTrust Improver Programme,

or the auditor has been deliberately misled on the credibility of the information provided by the applicant.

It could also mean, more generally, that the applicant has broken a legal obligation which puts food/feed safety, employee safety, or worker welfare at risk. This does not necessarily need to relate to a specific requirement in the MarinTrust Standards, but the details of the critical non-conformity must be detailed by the auditor.

In the event of a Critical Non-Conformance, the auditor will end the on-site assessment immediately, if the safety of the auditor is compromised. The CB shall not grant certification to the Applicant, and any future applications to the programme by the Applicant must include documented evidence of the policies and/or systems put in place to ensure the critical non-conformity does not re-occur. It is proposed that a period of 1 year shall pass before an applicant can reapply for certification to the Standard, to ensure that the systems to prevent the critical non-compliance re-occurring have been fully embedded into the applicant's quality management systems and culture.

If a critical noncompliance is raised for an existing client, the CB shall immediately suspend the MarinTrust certificate pending a full investigation by the CB. If the non-compliance is upheld the client shall have their certificate withdrawn and shall not be allowed to re-apply for the Standard for a period of 6 months. Please refer to A5 "The Issuing and Withdrawal of Certificates to the MarinTrust Certification Programme Procedure".

## 2.3 Closing meeting

At the closing meeting, the auditor shall present their findings and discuss and agree any non-conformances that have been identified. The auditor shall prepare a hand-written copy of the agreed non-conformances, which is signed and left with the applicant's technical representative.

Where Non-conformances are noted, the auditor shall refrain from instructing the applicant to take any particular course of corrective action. Auditors offering a recommended course of action to close out a non-conformance shall be seen as consultation and is in breach of ISO 17065 protocols.

On completion of the audit, a closing meeting shall be held with the applicant. The auditor will discuss any non-compliances raised, agreeing a corrective action and completion date for each. The corrective action and completion date will be recorded on the Non-Conformance Report (NCR) form which will be agreed by both the auditor and applicant at the closing

meeting. The applicant will be given a copy of the completed NCR form in an email following the audit within 3 working days. The applicant shall then be given a calendar month to provide written confirmation and any agreed objective evidence, e.g. where appropriate photos, invoices and/or receipts, to the CBs Programme Manager/Administrator when corrective actions have been completed.

Where there is more than one auditor used, e.g. in an integrated facility, a thorough and precise hand-over meeting must be held. This will serve to equip the Secondary Auditor fully with information regarding previous findings or missing components.

*Note - The Auditor on the Final Audit Report shall record where the Auditor is unable to agree a Non-conformance with the Applicant. The Non-conformance shall still stand and the Applicant can appeal the decision to the CBs and to the MarinTrust Governance Board Committee (Please refer to the Appeals and Complaint Document).*

All Audits shall be conducted in a professional manner, as expeditiously as possible and with **the minimum disruption to the day to day activities of the applicant being assessed.** The CBs Auditor shall ensure they comply with In-house Policies whilst at the location being assessed.

*Note- No indication on if the applicant has achieved certification shall be communicated to the applicant by the auditor at this time.*

*In the event that a critical non-conformity is established at an existing certificate holder of the programme, this certificate holder shall be instructed to immediately inform its customers to make them aware of the circumstances. The certificate holder shall inform both their CB and MarinTrust when this communication has been sent to their customers, and on its content, to allow MarinTrust to support their customers in obtaining a different supply of MarinTrust compliant marine ingredients until they can attain recertification. Please refer to the MarinTrust issuing and withdrawal procedure (A5) for further guidance.*

## 2.4 Derogations for Chain of Custody Standard

*Note – this section applies to the MarinTrust CoC Standard only, and CBs should refer to the CoC standard for the specific clauses that a derogation applies*

Within the MarinTrust CoC certification guidance, advice is given on what evidence would constitute full compliance and what circumstances would lead to a category of non-conformance being raised. All clauses in the CoC standard shall be closed off prior to certification, recertification or continuous maintenance of their MarinTrust CoC certificate,



apart from those clauses that have been **granted a derogation period** to allow an applicant a set period of time to meet these requirements following initial certification.

The derogation period that has been agreed for these CoC clause requirements shall be one complete certification cycle (3 years) to reach full compliance. However, the applicant shall need to show through a reportable action plan that progress to full compliance is progressing at each annual surveillance assessment. If the auditor reports no progress from the initial certification to the next annual surveillance, this shall be deemed a non-compliance to the MarinTrust CoC standard which could result in their certificate being suspended and possibly withdrawn.

## 2.5 Notification of Serious Food Safety/Legality Issues

It is a requirement of many purchasers that MarinTrust notify them immediately of serious Traceability and/or Legality issues arising out of a Supplier Inspection. In this unlikely event, MarinTrust shall discuss with the Applicant what action is necessary to meet the wishes of the specific purchaser(s) involved. In all cases, Reports are only distributed to Third Parties provided the owner of the Report (i.e. the Applicant) has consented in writing.

## 2.6 Audit Frequency

The surveillance audits and re-certification audits shall be conducted at the frequency defined by MarinTrust. The audit frequency as outlined by MarinTrust shall consist of an initial audit (year 1) followed by 2 surveillance audits on an annual basis (years 2 and years 3), each conducted within 12 months of the previous audit.

Certificates for the MarinTrust Standards shall be valid for 3 years upon successful surveillance audit results. Applicants shall re-apply for certification to the MarinTrust Programme 6 months prior to the expiry of the certificate. Re-certification audits shall be arranged at least three months before the certificate anniversary or certificate expiry date, and shall be carried out to allow the new certification to be completed before the current certificate date expires. *Where practicable, re-certification of a site shall be carried out by the same auditor only up to a maximum of three consecutive audits.*

In some cases, where the marine ingredient is not produced continuously, the re-certification audit shall take place while the factory is producing, and verification of corrective actions in relation to critical and major non-conformities shall take place within a period of time that the product is being manufactured.

*Note: Under exceptional circumstances MarinTrust in consultation with the CB may invoke an Extraordinary Procedure which shall take precedent over these audit frequencies. If this procedure is invoked by MarinTrust please refer to this procedure.*

## 3.0 Audit Reporting

The Non-Conformance Report (NCR) form shall be sent by the Auditor to the CBs within 24 hours at the end of the Audit. The Programme Manager/Administrator will check the form has been completed correctly and will despatch it to the Applicant informing them by /email within 21 working days that they now have one calendar month to close out the Non-compliances raised.

The Auditor shall submit the Final Report on the correct MarinTrust Programme Audit Report Forms.

The Report shall be a factual record of the results of the Audit and inspections carried out. It will clearly document any Non-conformance against the current MarinTrust standard Requirements and where appropriate corrective actions. Objective evidence is required and the agreed time scales for completion.

The Auditor shall sign the Final Report and forward to the Programme Manager/Administrator within 10 working days of the Audit. A copy of this Report shall be submitted to Applicant once the final certification decision has been taken.'

The Programme Manager/Administrator shall notify the Auditor of the need for his/her presence at any meeting at which the Report shall be reviewed in preparation for the Certification Decision, if applicable.

### 3.1 Initial Audit Reports

Following the audit, a detailed, typed list of non-conformances shall be issued to the applicant within 5 days. The auditor should also inform the CB within 24 hours of any Non-Conformances. After each audit a full written report shall be prepared in the correct format that has been approved by the CBs Accreditation Body and MarinTrust Secretariat. The report shall contain an audit summary, an overview of performance, summary of non-conformances, actions taken and a detailed audit report with comprehensive details of how the applicant complies with the relevant MarinTrust standard.

### 3.2 Non-conformance Follow-up

It shall be a requirement of the CB's Certification System that the applicant writes to the CB to confirm that action has been taken with respect to all critical, major and minor non-conformances identified during the audit. Depending upon the nature of the non-conformance, either documentary evidence or a re-visit shall be required to fully assess compliance before a certificate of approval can be awarded.

The CB shall check the applicant's file after 15 working days to evaluate the progress of the corrective actions and if necessary, contact the applicant to remind them of their obligation to provide evidence within a calendar month. All non-conformances shall be closed out within one calendar month, unless a request for extension has been approved. Extensions shall only be permitted for up to 6-months. CBs must also share the certificate extension to both the client and MarinTrust 1 month before the certificate expiry for posting on the MarinTrust website. Please refer to document A5 – Issuing and Withdrawal of Certificates Procedure, for further information.

### 3.3 Distribution of Final Audit Report

The auditor shall prepare the final report and submit it to the CB Programme Manager/Administrator for the MarinTrust Programme. The final report shall be reviewed and signed off by a technically competent and authorised manager.

Following submission of all appropriate evidence by the applicant, the auditor shall review the evidence and approve its compliance before it is submitted to the Programme Manager/Administrator.

Before presentation of this final report to the Certification Committee, the Programme Manager/Administrator shall review the report, specifically:

- The auditor's notes shall be reviewed to fully substantiate the non-conformances raised in the final report and are to be retained and placed on the applicant's file;
- The auditor's report of non-conformance shall not be recorded as a statement of corrective action or direction;
- There shall be evidence of corrective action time frames agreed upon and authorised by the applicant and the auditor at the time of the inspection to close them out;
- All evidence of subsequent corrective action taken by the applicant since the audit shall be available, presentable and clearly identifiable.

The certification committee shall review the final report and evidence file to determine if the applicant complies with all the clauses as laid down in the MarinTrust Factory and Chain of

Custody standards. Typically, 7 days will be allowed for technical review, 7 days for the committee meeting, and then 7 days for the certification decision.

The certification decision and final report shall be despatched to the applicant within an agreed timescale. This shall be no longer than 5 working days after the certification meeting. A copy of the audit report and certification decision shall also be sent to the MarinTrust Standards Administrator within the same time period of no longer than 5 working days after the certification meeting. The MarinTrust Secretariat shall use these audit reports for standard consistency monitoring purposes.

The result of an audit shall be categorised as follows:

- Certification Achieved
- Certification not Achieved\*
- Certification not Granted

\* In such instances, further information shall be requested from the applicant with a maximum of 7 days permitted for submission of the required additional evidence if the certification committee feel that more information is required to meet the intent of the relevant MarinTrust Clause.

The main contact indicated in the MarinTrust application form shall be regarded as the applicant. As such, it is this party that receives the final report.

## 4.0 Records

A copy of the Final Audit Report, NCR form and correspondence conveying the Certification Committees decision will be held in the Applicant's file for a period of 5 years. If the certification has now lapsed or moved to another CB or if it is a current certificate records for the previous two certification cycles shall be maintained.

The Final Audit Report shall also be sent to the MarinTrust Secretariat for record keeping and research purposes, but its contents shall be treated as strictly confidential and shall not be placed in the public arena.

## Appendix 1

### Code of Conduct for All CBs Staff/Auditors

#### **Objective**

To define the code of conduct, which shall be adhered to when operating the CBs certification services.

#### **Responsibilities**

Everyone in the CB, both office and home based has the responsibility to ensure their conduct does not compromise the independence, integrity and impartiality of the CB.

All managers are responsible for ensuring that staff is aware of the need to maintain independence, integrity and impartiality and operate in accordance with this procedure.

#### **Procedure Independence, Impartiality and Integrity**

It is essential that audits and related activities are demonstrable independent of pressure from the inspected applicant or any other parties. The CB must take steps to ensure that commercial activities, which have the potential to conflict with the inspection process, are avoided at all times.

The CB must not provide consultancy, advice or bespoke training. It is essential that the CB's staff, including the auditors, do not offer advice, or provide information either at the time of the Audit or at any time that may compromise the independence, integrity, or impartiality of CB.

The following are examples of activities, but not limited to, that are prohibited:

- Providing specific recommendations to an applicant on how requirements of the MarinTrust standards could be met.
- Providing documentation other than the MarinTrust standards, CB certification protocols or auditor inspection guidance notes.
- Providing advice in response to specific queries that could be interpreted as how an applicant can comply with the correct MarinTrust standard.
- Providing advice on the design/ development of facilities or processes.
- Participating in the decision-making process on applicant's management system matters.

Where unsolicited requests for such services are received the CB's staff is required to politely decline such requests and inform the applicant of the CB's policy.

## Audit Process

Auditors shall be aware that applicants require audits which fully ‘test’ their systems against an agreed Standard such as the correct MarinTrust standard and which identify deficiencies that require appropriate preventative or corrective action. In addition, the judgment of the auditors must be based upon objective evidence and must be independent of any outside pressure or influence.

It is particularly important that the audit is seen to be ‘testing’ by the applicant because of the thoroughness of the audit method and not because of the way in which the auditor relates to the employees of the inspected applicant.

It is the ‘questions asked’ and ‘not the way in which they are asked’ which should determine this issue.

Audits shall therefore:

- Be thorough and be undertaken diligently.
- Auditors must be courteous at all times and avoid being influenced by their own emotions.
- Be aimed at gathering objective evidence to either support compliance to standards or to identify deficiencies.
- Conform to the CBs documented structure.
- Results in reports, which contain only those deficiencies discussed and agreed at the closing meeting.

## Hospitality and Gifts

At all times the CBs staff and Auditors shall remain above reproach and their integrity and credibility maintained.

Whilst staff/Auditors may be provided with lunch or may be invited to dinner by applicant’s staff, it is clear that there is a ‘fine line’ between normally accepted Standards of Hospitality and possible bribery and corruption. The CB’s staff therefore needs to act with caution and if in doubt refuse such hospitality.

Similarly, in relation to gifts, it is advisable to refuse such offers but again common sense needs to prevail. Factors to consider in such situations are as follows:

- Is the hospitality or gift within the normal bounds of commercial practice?
- What are the company’s intentions?
- What is the stage of the audit – is the offer made after the closing meeting?
- Would public knowledge of the gift undermine the auditor’s or the CBs integrity and credibility?
- Would a legal defence in court be undermined by the offer?
- Is the gift an example of product produced on-site or has it been specifically purchased for the auditor.

Where there is a clear attempt to bribe the auditor, then the audit process should be ended and the CB's Senior Manager or Programme Manager/Administrator informed immediately.

### **Disciplinary Action**

Any CB staff/ auditors found to contravene this code of conduct guideline would be judged to have contravened their contract of employment and will be subject to disciplinary proceedings.

## AMENDMENT LOG

DATE	ISSUE	AMENDMENT	AUTHORISED BY
08/05/2015	1.3	Introduction of IFFO RS Logos, IFFO RS Ltd and the wording Marine ingredients	Francisco Aldon
26/01/2016	1.4	Edit of title in 1.1 ' <i>Pre-audit Process</i> '	Francisco Aldon
26/01/2016	1.4	Addition of wording in 1.1, fourth paragraph " <i>will be confirmed in writing to the applicant and the IFFO RS Secretariat from the Programme Manager/Administrator.</i> "	Francisco Aldon
21/01/2016	1.4	Edit of section title, 1.1, paragraph 6 ' <i>The pre-audit process for audits subsequent to the initial audit - termed here as "Re-audits - does not include a Pre-Audit Check."</i> '	Francisco Aldon
21/01/2016	1.4	Wording edit in 1.1, paragraph 6 " <i>to take into account changes in the Audit Frequency</i> "	Francisco Aldon
12/09/2017	1.5	Amendments to paragraph 4, page 1 " <i>If the Pre-audit Check is successful, the Audit Date along with a Site Audit Schedule, (developed in conjunction with the Auditor if applicable), will be confirmed in writing to the Applicant. IFFO RS secretariat/Standards Administrator from each IFFO RS approved Certification Body will receive a monthly Certification Tracker indicating the audit schedule.</i> "	Francisco Aldon
<b>Version 2 edits (MarinTrust conversion)</b>			
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> ' to encompass both the MarinTrust Standard and	Libby Woodhatch
01/10/2020	2.0	Addition of wording ' <i>,</i> upon receiving the MarinTrust application form of an applicant from the MarinTrust secretariat,' and ' <i>5 working days</i> ' , in section 1.0, first paragraph	Libby Woodhatch
01/10/2020	2.0	Inclusion of minimum data to be captured in the Certification Tracker held by the CB, in section 1.0, fourth paragraph	Libby Woodhatch
01/10/2020	2.0	Addition of note ' <i>Note in the event of an extraordinary event being declared, the extraordinary event procedure shall take</i>	Libby Woodhatch



		<i>precedent over audit frequency requirements' in section 1.0</i>	
01/10/2020	2.0	Addition of further guidance on language and conducting audits in section 2.0 – general, information, first paragraph	Libby Woodhatch
01/10/2020	2.0	Inclusion of wording 'The auditor after 3 consecutive audits of a single plant may not be used on the 4 <sup>th</sup> unless they have been given permission by MarinTrust.' And further guidance on key elements for consideration during the on-site audit in section 2.0, page 4.	Libby Woodhatch
01/10/2020	2.0	Inclusion of specific audit duration guidance and requirement for the completion of the certification timeline tracker in section 2.0, final paragraphs	Libby Woodhatch
01/10/2020	2.0	Conformance definitions split into own section, now section 2.2., and addition of further guidance in the case of a critical non-conformance raised for new and existing applicants in the final paragraphs	Libby Woodhatch
01/10/2020	2.0	Addition of section 2.3 – closing meeting	Libby Woodhatch
01/10/2020	2.0	Addition of section 2.4 – derogations for the Chain of Custody	Libby Woodhatch
01/10/2020	2.0	Additions of Sections 2.5 – Notification of Serious Food Safety / Legality issues, 2.6 – Audit frequency, 3.1 – Initial Audit Reports, 3.2 Non-conformance follow-up and 3.3 – Distribution of Final Audit Report from appendix A2 removed and included in appendix A4 – Guidelines for CBs managing applications to certification for the MarinTrust Programme.	Libby Woodhatch
01/10/2020	2.0	Addition of further guidance on records in section 4.0, first paragraph.	Libby Woodhatch