

MarinTrust Programme Standard Development Procedure

Contents

Introduction.....	2
Purpose & Scope.....	3
Terms and Definitions.....	3
Internal Governance Roles.....	4
Terms of Reference for MarinTrust Standard Development	5
Standard Development Procedures for the Drafting of New or Revises Standards	6
Public Consultation Process:.....	7
Non-substantive Change to Standards:	8
Records	9
Standard-setting Procedure Review	9
Urgent Revision Process:	10

Introduction

The MarinTrust Programme (previously known IFFO RS) has been in existence since 2009 and is the leading independent business to business certification programme for the production of marine ingredients. The programme consisting of 3 main elements; The MarinTrust Standard, the MarinTrust Chain of Custody Standard (CoC), and the MarinTrust Improver Programme (IP).

The mission of the MarinTrust Programme as agreed by the MarinTrust Governing Body Committee (GBC) is based on the following three key pillars:

- **Responsible Sourcing:** of fishery material (non IUU) from fisheries that comply with the key principles of the FAO Code of Conduct for Responsible Fisheries.
- **Responsible Traceability:** of marine ingredients back to fisheries that are compliant with this Standard.
- **Responsible Production:** of safe marine ingredients in a safe working place.

The key objectives of the MarinTrust programme are as follows;

- To ensure that whole fish used come from fisheries managed according to the FAO Code of Conduct for Responsible Fisheries.
- To ensure no Illegal, Unreported and Unregulated (IUU) fishery materials are used.
- To ensure pure and safe products are produced under a recognised Quality Management System, thereby demonstrating freedom from potentially unsafe and illegal materials.
- To ensure full traceability throughout production and the supply chain.
- To ensure that all other raw material, fishery and aquaculture by-products used can be traced back to their source fishery and farm.
- Fish by-products or trimmings used in MarinTrust Compliant Marine Ingredients must not come from fish species that are classified as endangered on the International Union for Conservation of Nature (IUCN) list and must be derived from fish intended for direct human consumption.
- Certified factories must commit to having Environmental and Social Policies in place and enforced.

The MarinTrust programme Chain of Custody Standard is designed to protect the product integrity and providence of all labeled MarinTrust Compliant Fishmeal and Fish Oil as it passes through the Global Supply Chain.

In order to assure that the MarinTrust Programme remains at the forefront of Marine Ingredients (Fishmeal and Fish Oil) sourcing and production, the MarinTrust Secretariat is committed to review and enhance the programme's Standards in accordance with this procedure in order to; maintain the credibility of the programme, meet with the expectations of the Marine Ingredient Manufacturing Sector and the Global Supply Chain. MarinTrust standards shall be subject to an annual review and a full revision of its standards at least once every 5 years.

Purpose & Scope

This document outlines the steps that are required to be followed by MarinTrust Secretariat when scoping out and conducting a standard review and revision in relation to all MarinTrust standards within the MarinTrust programme. It shall cover all areas required to set and develop a new standard as well as review and revision requirements for the existing standards.

The primary purpose of this document is to safeguard the credibility of MarinTrust programme by ensuring consistency in the standard development and revision processes through these defined procedures.

Terms and Definitions

In order to maintain consistency and understanding, some of the terms used within this procedure are defined below;

Accreditation: A process by which an authoritative body gives formal recognition of the competence of a certification body to provide certification services against an international standard e.g. ISO 17065

Certification Requirements Procedure: by which certification body or entity gives written or equivalent assurance that a product, process or service conforms to specified requirements. Certification may be, as appropriate, based on a range of audit activities that may include continuous audit in the production chain.

Certification Body: A provider of certification services, accredited to do so by an accreditation body.

Chain of Custody: The set of measures that verify that a certified product originates from a certified aquaculture production chain and is not mixed with non-certified products. Chain of custody verification measures should cover the tracking/ traceability of the product all along the production, processing, distribution and marketing chain, the tracking of documentation, and the quantity concerned.

Consensus Decision-Making: A decision-making process that not only seeks the agreement of most participants, but also resolves or mitigates the objections of the minority in order to achieve the most agreeable decision.

Consultation Process: The process of consultation is an extremely important concept in the context of managing an organisation. Consultation is an active process in which organisation management opens formal and informal communication channels between the organisation and its stakeholders.

Secretariat: The office or people responsible for the management of the MarinTrust organisation

Stakeholder: A stakeholder is any person, organisation, social group, or society at large that has a stake in the marine ingredients business. Stakeholders can be internal or external to the marine ingredients business. A stake is a vital interest in the marine ingredients business or its activities.

Standard Document: Approved by a recognised organisation or arrangement, that provides, for common and repeated use, rules, guidelines or characteristics for products or related processes and production methods, with which compliance is not mandatory under international trade rules. It may also include or deal exclusively with terminology, symbols, packaging, marking or labelling requirements as they apply to a product, process or production method.

Standard Developing Procedure: This means that the Consensus Decision-Making Process is used when developing documents set to become MarinTrust standards of the MarinTrust Programme.

Standard Review: The development, review, and approval process for a Standard

Terms of Reference: The terms of reference (ToR) document defines all aspects of how a consultant or a team will conduct a review and revision of a standard within the MarinTrust Programme. It defines the objectives and the scope of the standard review and revision.

Third party certification: Procedure by which an accredited external, independent, certification body which is not involved in standards setting or has any other conflict of interest, analyses the performance of involved parties, and reports on compliance. This is in contrast to first party certification (by which a single company or stakeholder group develops its own standards, analyses its own performance, and reports on its compliance and second party certification (by which an industry or trade association or NGO develops standards, analyses the performance of involved parties, and reports on compliance).

Traceability: The ability to follow the movement of a product of fisheries or aquaculture or inputs such as feed and seed, through specified stage(s) of production, processing, transport, and distribution. (Adapted for GSSI).

Internal Governance Roles

The following groups are involved in the standard setting process and fulfil the roles described:

- **The MarinTrust Governing Body Committee (GBC)** makes the approval decision on the scoping, setting and development of a new standard or revision of existing standards. The GBC takes the final decision on new and revised standard approval by consensus decision making prior to publication.
- **The MarinTrust Technical Advisory Committee (TAC)** provides expert advice and technical assistance with the development, review and approval of the standard clauses, certification requirements and all technical aspects of MarinTrust standards by consensus decision making prior to final review and approval by the GBC.
- **The MarinTrust Standard Steering Committee (SSC)** provides support on the development and revision of a credible and robust factory certification standard for the Marine Ingredients Industry and to develop and maintain the technical certification specifications for the certification criteria and technical guidance used during the MarinTrust.

- **The MarinTrust Social and Ethical Committee (SEC)** supports the development and implementation of credible, robust, and realistic criteria focusing on human rights and social welfare within the MarinTrust Programme.
- **The MarinTrust Secretariat** arranges and facilitates the process of the development of a new standard or revision of existing standards which includes both the planning of the process and development of content.

Terms of Reference for MarinTrust Standard Development

For a new standard a new Terms of Reference (TOR) is developed. As for revision of an existing standard the current TOR (where applicable) shall be updated.

At the outset of a new standard development or revision process, the Scheme Owner develops or updates Terms of Reference (ToR), which includes at least the following elements: – Proposed scope of the standard and intended geographic application; – Clear objectives that the standard seeks to achieve and how those are linked to the organisation’s intended change.

Terms of Reference (ToR) shall include the following elements:

- Defined objectives for the new standard or revision to existing standard.
- The proposed scope of the new standard or revision to existing standard.
- The purpose of the scope of the new standard or revision to existing standard and its intended geographical application.
- Justification for the need of the new standard or revision to the existing standard.
- An Impact assessment of risks in implementing the new or revised standard and how to mitigate these on current certificate holders.
- Include clear reference to the social, environmental, and economic objectives of the new or revised MarinTrust standard.

Development of a ToR

- The draft ToR shall be created by the MarinTrust Secretariat and presented to the TAC for review, comment, and approval.
- The draft ToR shall be presented to the MarinTrust GBC for approval.
- The draft ToR shall be placed in Public Consultation available to all stakeholders and interested parties for 30 days to seek stakeholder input from those directly and indirectly affected by this proposed new version or revision to existing standard. Using the public consultation process stated within this procedure.

- The comments received from Public Consultation shall be considered and incorporated where necessary.
- The final ToR shall be presented to the MarinTrust GBC for approval and sign off.
- Upon sign off, the decision to carry out the development of a new standard or revisions to an existing standard shall be publicly announced and made available on the MarinTrust website.
- Complaints regarding the scope of the new or revised 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.

Standard Development Procedures for the Drafting of New or Revises Standards

- Drafts of the new or revised standard requirements and/or certification (interpretation) requirements shall be developed by MarinTrust Secretariat with programme consultants, if required, prior to and following stakeholder feedback.
- All drafts of the new or revised standard and/or certification requirements shall be presented to the TAC for technical review and development or a bespoke TAC/working group if the technical competencies required for the new or revised standard are outside of the scope of the current members of the TAC.
- All drafts of the new or revised standard and/or certification requirements shall be pilot tested with the registered Certification Bodies to ensure that standard requirements are auditable and can maintain the accreditation of the certification procedures used by the MarinTrust approved Certification Bodies.
- All amends to the new or revised standard and/or certification requirements shall be approved by the TAC.
- Followed by the MarinTrust GBC approval prior to public consultation.
- The public consultation shall be conducted using the Public Consultation Procedure.
- Any amends to the new or revised standard and/or certification requirements following public consultation shall be approved by the TAC prior to sending to the GBC.
- The GBC shall review the new or revised standard and/or certification requirements and if a consensus decision is made, the new version of the standard or certification requirements shall be approved.
- The new and revised standard and/or certification requirements shall be communicated to existing certificate holders, certification bodies, and accreditation bodies directly and placed

publicly on the MarinTrust website with an effective date as to when this new and revised standard and/or certification requirements shall come into force.

- A transition period to allow existing certificate holders to be capable of complying with the new or revised standard shall be approved by the GBC and publicised on the MarinTrust website with the new and revised standard. A transition period shall have a predetermined end date stipulated.
- Translations for the new and revised standard and/or certification requirements shall be made available to all stakeholders directly or indirectly affected by the new standard or changes to an existing standard or certification requirement.
- Revised training materials and sign off procedures shall be used to ensure that all auditors used by the certification bodies are fully competent to assess and score the new or revised standard and/or certification requirements.

Public Consultation Process:

- This MarinTrust Public Consultation Process shall be followed when carrying out Public Consultation for the development of new standard development or the revision of an existing standard.
- Public Consultation shall be open to all stakeholders and interested parties.
- For the development of a **new standard and/or existing standard** there shall be two rounds of Public Consultation;
 - The first round of Public Consultation shall last 30 calendar days (*Note- shall seek input from stakeholders on the draft TOR for the new and existing Standard development*).
 - The second consultation shall last 60 calendar days on the draft standard requirements (*Note- shall give stakeholders the opportunity to give feedback -the MarinTrust Secretariat shall be proactive in obtaining stakeholder engagement by conducting a stakeholder mapping process to ensure that all affected stakeholders have an opportunity to comment*);

MarinTrust as part of this consultation shall:

- provide feedback on how their comments were taken into account
- to gather further input on substantive unresolved issues
- Where substantive, unresolved issues persist after these consultation rounds, or where insufficient feedback was received, the GBC shall be consulted to discuss and decide if the MarinTrust secretariat shall carry out additional rounds of consultation.

- Key stakeholders shall be proactively contacted to contribute to the consultation, in particular those who are typically under-represented such as small producers and developing country stakeholders, and those who will be directly affected or disadvantaged by any change. Organisations that have developed related standards shall also be encouraged to participate, and this engagement shall be documented.
- There shall be at least one round of public consultation for the revision/amendment of existing **certification standard requirements** used by the certification bodies as part of the certification process, with a second round required if:
 - Substantive changes have been made since the first draft, or
 - There are substantive unresolved issues, or
 - Feedback from the first round was deemed insufficient.
- The duration of first and second consultations on a revision of an existing certification standard requirements shall be at least 30 days.
- All amendment proposals to the draft standard requirements or certification requirements shall be presented to the TAC for decision, and any decision to reduce or remove the second round of consultation shall be noted and justified in writing.
- Where substantive, unresolved issues persist after two rounds of consultation, or where insufficient feedback was received, the GBC shall be consulted to discuss and decide if MarinTrust secretariat shall carry out additional rounds of consultation.
- After each consultation, a summary document of all the attributed comments received and details of how these have been taken into account shall be produced.
- Any unattributed comments shall also be appended to the summary.
- Comments shall be noted by interest sector of the contributor, but individual or group names shall never be incorporated.
- Commercially sensitive and defamatory comments shall be removed.
- The summary shall be made publicly available and sent to all stakeholders who submitted comments.

Non-substantive Change to Standards:

The MarinTrust Secretariat shall instigate an annual review of all MarinTrust standards, certification requirements as part of its document control procedure appendix C1 within the MarinTrust QMS. This procedure stipulates what changes can be authorised by the secretariat without the need to escalate

to the GBC for approval. These changes include correction of spelling, grammatical errors, changes to generic forms designed to capture data e.g. application forms.

Any amended standard, certification requirements documents shall be reissued on the MarinTrust website and within the MarinTrust QMS.

Records

For each standard review and development process the following records are retained:

- The ToR for the process.
- The ToR for MarinTrust governance bodies (GBC, TAC, Bespoke TAC/Working Group).
- Synopsis or synopses and original Public Consultation comments.
- Stakeholder participation monitoring and feedback.
- The draft standards and certification requirements.
- Decision and justification for either shortening or lengthening elements within the Public Consultation Procedure.
- Announcements (press release) for; launching the Standard Review and Development processes, plus each Public Consultation, the launch of the new or revised standard, and the transition arrangement of current standard holders to the new or revised standard.
- Minutes of meetings of the governance bodies (GBC, TAC, Bespoke TAC/Working Groups).

For the purpose of full transparency, all records shall be made available on the MarinTrust website for a minimum of 3 years after the standard has come into effect. However, all records shall be maintained by the MarinTrust Secretariat until after the next revision of the standard, as a minimum.

Once records on the MarinTrust website have been removed, stakeholders and interested parties may contact the MarinTrust Secretariat to request a copy of them at its discretion.

Standard-setting Procedure Review

The MarinTrust Quality Management System (QMS) Review Committee is responsible for drafting and managing the MarinTrust Controls and Procedures. As part of this, the MarinTrust QMS Review Committee shall conduct an annual QMS review to ensure the continuing suitability, adequacy, and effectiveness of the MarinTrust Secretariat. The MarinTrust QMS Review Committee shall review this Standard-Setting Procedure to ensure it remains current and applicable.

Comments on the standard-setting procedures are welcomed at any time, and also specifically invited during the Standards review phase and should be directed to standards@marin-trust.com.

Urgent Revision Process:

The purpose of the Urgent Revision Process is to facilitate MarinTrust Secretariat as the standard-setting organisation to carry out urgent substantive revisions to the standard(s) or certification requirements.

This process outlines the conditions under which these revisions may be triggered and the steps to be taken in the event of the urgent revision procedure being prompted.

Step 1

MarinTrust GBC shall establish the urgency required for revision in-between regular revision.

MarinTrust shall justify the need for an urgent revision based on the following triggers which if not addressed quickly could lead to reputational integrity issues for the MarinTrust program and its certificate holders;

- Changes to the operational practices in the sector relevant to the Standards.
- Change in legislation where the MarinTrust certification holder are based.
- Significant change in the supply chain requirements.
- Brand reputation risks for the Marine Ingredients industry identified.

Step 2

The MarinTrust Secretariat shall instigate a full review of the urgency trigger to determine what impact it will have on the MarinTrust programme and, with the technical advice and guidance of the TAC, give recommendations to the GBC to consider on the best approach to mitigate this trigger.

Step 3

The GBC shall review the recommendations report and consider the following options;

- Consider the trigger is not significant enough to warrant a standard review or amendment.
- Consider the trigger is significant and request that a more focused impact assessment is conducted on the areas of the standard or certification requirements that could be affected by this urgent trigger prior to a formal review of the standard or certification requirements.
- Consider the trigger is significant and instigate a full review of the affected areas of the standard or certifications requirements to address the urgent trigger issue outside the normal standard review and development cycle.

Step 4

Upon approval by the GBC to conduct a standard review this process shall be invoked and followed by the MarinTrust Secretariat.

Step 5

Records of all these steps shall be maintained and posted on the MarinTrust website to ensure that all stakeholders fully understand the process that has been adopted which has or has not invoked an urgent review of the standards within the MarinTrust programme.

