

Certification Body (CB) Approval Requirements for MarinTrust Audits and Certification

Introduction

The MarinTrust Certification Programme is owned by the MarinTrust Governing Body Committee and operated by the MarinTrust Secretariat. The Programme certifies that marine ingredients such as fishmeal and fish oil are manufactured responsibly and produced from fishery material supplied from responsibly managed fisheries.

The Programme consists of a set of standards applicable for Marine Ingredient Producers and for the Chain of Custody of compliant material through the supply chain.

This document describes the requirements necessary for Certification Bodies (CBs) to apply and become successfully approved to Audit and Certify Applicants against current standards under the MarinTrust programme assess and approve the responsibly managed fisheries.

Scope

The scope of CB Approval Requirements covered is for the auditing and certification under the current standards of the MarinTrust programme current version and the approval assessments of the responsibly managed fisheries.

1. Certification Body Registration with MarinTrust

1.1. Registration

- 1.1.1. Certification Bodies (CBs) wishing to apply to certify factories or approve fisheries against the MarinTrust Programme shall first, as a pre-requisite, be accredited to ISO/IEC 17065:2012 Conformity assessment - Requirements for Bodies Certifying Products, Processes and Services.

CBs wishing to seek recognition shall formally write a letter of intent to the MarinTrust Secretariat, confirming their intention to apply for approval to audit and certify against the



MarinTrust Programme and an explanation of how the CB complies with key requirements including, but not limited to; ISO accreditation and current scope, Accreditation Body status, abilities to conduct both fishery assessments and factory audits, and global reach.

Upon receipt of the letter of intent for approval to certify against the MarinTrust Programme, MarinTrust will provide the CB with a copy of this “Approval Requirements Document” procedure and other relevant documents.

CB Applicants shall meet all requirements of this Approval Requirements Document including, but not limited to, the competency and training requirements for CB Staff and individual auditors and Assessors.

Only CBs that are registered and formally recognised by MarinTrust are authorised to conduct factory audits and fishery assessments against the MarinTrust programme.

Recognition of a CB by MarinTrust will only take place if the CB Accreditation Body is also recognised by MarinTrust. To this extent the Accreditation Body must be a member of the International Accreditation Forum (refer to www.IAF.NU).

CBs should note that review of applications includes consideration of global reach of the Certification Body’s Organisation for MarinTrust, with an emphasis on ensuring MarinTrust has geographical coverage in all regions but particularly Europe, Asia and Africa.

MarinTrust Standards (Requirements for Certification) current version.

ISO/IEC 17065:2012 MarinTrust Scope Extension:

To achieve an extension to their current ISO/IEC 17065:2012 Scope of Accreditation, a CB shall demonstrate it is able to carry out evaluations against the MarinTrust standards. Therefore, a CB shall be allowed to carry out a specified number of evaluations, at least 5 but no more than 10, prior to achieving full accreditation extension for the MarinTrust Standards.

CBs in Application for extension to their Accreditation, shall identify their certification activity by the issuing of MarinTrust Standards Certificates and by using the terminology ‘Accreditation in Application’ to all those applicants they certify.

The applying CB shall be able to provide documentation that confirms that they have a current and active application to the Accreditation Body for an extension to scope against ISO/IEC 17065:2012 accreditation to include the current MarinTrust Standards.

Accreditation Scope Extension must be expected within 12-18 months of the date of application to their Accreditation Body.

CBs are also required to ensure that all new MarinTrust standards or versions of standards are included within their scope of accreditation within 18 months of the new standard or version of standard being approved by the Governing Body Committee.

1.2. Named CB Representative

The CB will have a named representative responsible for dealing with all aspects of MarinTrust Standards accreditation and be knowledgeable of the entire MarinTrust Programme. This person shall be named and their position in the CB recorded on the Application Document. In the event that this named representative leaves the employment of the CB or moves to a different role, the MarinTrust secretariat shall be informed accordingly and provided with the name and details of a replacement, within a period of 5 working days.

2. Quality Management System

2.1. General Requirements

As part of the approval process the CB shall provide evidence to MarinTrust secretariat to show that it has a fully documented and implemented Quality Management System (QMS), under the responsibility of a designated individual within a defined Management Structure. The QMS shall be in accordance with accreditation requirements and the QMS must ensure the CB is able to deliver the MarinTrust programme in line with the policies and procedures set out in the MarinTrust control manual. This QMS shall be subject to annual System Reviews conducted to ensure continuous improvement in the quality of services provided by the CB.

- 2.1.1. The CB's Quality Management System shall be documented in a Quality Manual and associated Quality Procedures that are made available to all staff to implement, maintain and be continually improved.
- 2.1.2. The CB shall have an appropriate Quality Manual, which shall include a Quality Policy Statement that outlines the management commitment to ensuring its certification quality objectives.
- 2.1.3. As part of the Quality Manual, the CB shall identify and document ownership, have a clear organisational structure and unambiguously define key procedural documents, job functions, responsibilities and reporting relationships of all staff engaged in delivering their certification services.
- 2.1.4. The CB shall clearly identify the staff member(s) accountable for the maintenance of

their Quality System.

- 2.1.5. The CB shall have a list of everyone employed within the organisation and maintain personnel records for all staff and auditors, which covers their qualifications, training, experience, affiliations, professional status, and any relevant consultancy to identify any possible conflict of interest or risks to impartiality.
- 2.1.6. A description of how the CB will manage the Certification Process, including the Technical Review and/or Control of Certification Decision Processes such as the Certification Committee Structure, its Membership Criteria and the Terms of Reference and Operating Procedures.
- 2.1.7. Details of the CB's Management Review Processes, including Policy and Review Procedures, including frequency and documented results. Reviews shall be conducted, at a minimum, every 12 months.
- 2.1.8. The CB's Document Control Procedures shall specify:
 - a) Approval documents for adequacy prior to issue.
 - b) Review and update as necessary and re-approve documents.
 - c) That changes and the current revision status of documents are identified.
 - d) That relevant versions of applicable documents are available at points of use.
 - e) That documents remain legible and readily identifiable.
 - f) Those documents of external origin determined by the organisation to be necessary for the planning and operation of the CBs Quality Management System are identified and their distribution controlled.
 - g) The prevention of the unintended use of obsolete documents, and to apply suitable identification to them if they are retained for any purpose.
- 2.1.9. A documented Recruitment Procedure that covers Selection, Initial Training, Ongoing Training and Performance Assessment for all relevant staff and auditors/assessors.
- 2.1.10. A list of all approved subcontractors and a detailed Procedure for their Appointment, Assessment and their Ongoing Management shall be documented.
- 2.1.11. Procedures for actions taken in response to any Non-conformity raised in a Certification Audit or a failed clause in a Fishery Assessment are required, to evaluate the effectiveness of agreed objective evidence presented, or corrective or preventative actions taken by the applicant.
- 2.1.12. Procedures in relation to the use of the MarinTrust Programme Certificates, Rules for Granting, Suspending or Withdrawing the certificate, and the actions taken by the CB should a suspension or withdrawal need to take place.
- 2.1.13. Policies and Procedures in response to Appeals, Complaints and Disputes shall be documented.
- 2.1.14. Documented Procedures for Conducting and Documenting all Internal Assessments of the QMS and the certification process and any resulting corrective actions that may arise.

3. Contractual Arrangements

3.1. CB Contract Arrangements with Marine Ingredients Certifications Ltd

3.1.1. On approval, the CB will be required to enter into a Contractual Agreement Marine Ingredients Certifications Ltd. The agreement will provide the basis by which the CB can undertake Audits and/or Assessments against the MarinTrust Programme for potential Applicants, but does not constitute a Guarantee of Certification Business. The agreement will identify the Terms and Responsibilities of each party with respect to conducting fishery assessments and third-party Accredited Audits and the Certification of Applicants to the MarinTrust Programme.

3.2. CB Contracts Arrangements with Applicants for Certification

- 3.2.1. The CB shall ensure that a Contractual Agreement with the applicant is in place prior to the authorisation and provision of any fishery assessment and/or factory audit activity and certification reporting.
- 3.2.2. The Contractual Arrangement shall include the notification to the applicant of the requirements of the CB to provide the applicant's Information associated with the audit/assessment and certification status to the MarinTrust Secretariat and with the MarinTrust Governing Body Committee when specifically requested.
- 3.2.3. The CB shall have procedures in place to ensure that the resources to undertake any MarinTrust Fishery Approval and/or Factory certification activity will be in place on entering into a contract to provide these services with a potential applicant or existing certificate holder of the MarinTrust Programme.

3.3. CB Contractual Arrangements with Own Staff and Subcontracted Auditors

3.3.1. The CB shall have in place agreements with all staff involved in the Certification Process which obligates them, at a minimum, to the requirements listed below. The CB shall further have agreements in place with all its auditors, including its Subcontracted auditors.

The CB shall carry out factory audits and fishery assessments:

- With all due skill and care.
- In accordance with the relevant standard.
- In accordance with any conditions attached to their Accreditation and only in respect of the MarinTrust programme for which they are registered.
- Using only auditors and fishery assessors who are trained and meet the competencies of the MarinTrust programme.
- In accordance with International Best Practice in Third Party Assessment and Auditing, which includes Auditor Code of Conduct for Impartial and Ethical Behaviour.

3.4. Provision of Certification Information to MarinTrust Secretariat

The CB shall inform the MarinTrust Secretariat of all Certification Decisions and to which Applicant, within a period of 3 working days. Information on certification decisions can be shared with the MarinTrust Governing Body Committee when specifically requested.

4. CB Registration with Accreditation Body

Any CB approved by MarinTrust wishing to carry out Fishery approval or Factory certification and approval services against the MarinTrust programme shall be accredited to ISO/IEC 17065:2012 Conformity Assessment – Requirements for bodies certifying products, processes and services by a recognised Accreditation Body that is a member of IAF (International Accreditation Forum) and a signatory to the IAF Multilateral Recognition Arrangement (MLA.).

Should Accreditation to the Scope of the MarinTrust programme not be granted within the timeline specified in section 1, the CB's Approval with Marine Ingredients Certifications Ltd may be invalidated and re-registration will not be an option until further evidence of the commitment to achieve Accreditation Status is provided to Marine Ingredients Certifications Ltd by the CB.

4.1. Accreditation Status

The CB must inform the MarinTrust Secretariat change of Accreditation Status or Changes to Ownership, Management Structure or staff involved in the MarinTrust Standards, within 24 hours.

4.2. Scope of Expertise

CBs shall demonstrate to their Accreditation Body that their staff and contractors have the knowledge and expertise to work within the specified fields of knowledge relevant to the industry sector covered under the MarinTrust programme. All staff members undertaking Fishery Approvals or Factory certification activities must have the appropriate qualifications, training, experience and skills to perform evaluations against the MarinTrust programme. CBs shall demonstrate appropriate training for each factory auditor, subcontracted auditor, fishery assessor and subcontracted fishery assessor has been undertaken to understand the MarinTrust Programme. **The importance of demonstrable competency under the Scope of Evaluation cannot be over emphasised for all staff, auditors and fishery assessors.** Competency must extend to the areas of the MarinTrust programme against which the CB will be conducting evaluations: factory and/or fishery.

4.3. Factory Auditor/ Fishery Assessor Registration and Training

- 4.3.1. The CB will hold a detailed and complete skills matrix or files for each auditor/ fishery assessor undertaking MarinTrust standards audits and/or fishery assessments.
- 4.3.2. The CB shall maintain up-to-date records demonstrating how each auditor/assessor complies with the requirements for qualifications, training requirements and experience required under the MarinTrust programme.
- 4.3.3. These records shall be made available to the MarinTrust Secretariat and supplied on request to MarinTrust Governing Body Committee.

4.4. Specific Factory Auditor/ Fishery Assessor Qualification Requirements

The CB shall ensure that it has auditors and assessors that meet the requirements as stipulated in MarinTrust Procedures B2 – Appointment of MarinTrust Fishery and By-product Fishery Assessors and B3 – Appointment of MarinTrust Factory & Chain of Custody auditors.

4.5. CB Factory Auditor/ Fishery Assessor Practical Evaluations

Each newly trained auditor will need to successfully complete one (1) MarinTrust audit to the relevant standards which is witnessed by an experienced and registered auditor. In addition, the auditor will need to prove they have had experience of a minimum of 10 audit days at a number of different organisations against similar type standards (such as, but not limited to, GMP+, FEMAS or GFSI recognised standards) before they can be formally registered as an approved auditor for the relevant MarinTrust standards.

Each newly trained Fishery Assessor must complete one (1) MarinTrust standard fishery assessment which is peer reviewed by an approved fishery assessor prior to being accepted as an approved fishery assessor.

4.6. Maintain Assessment Experiences

The CB shall have in place an annual review programme to maintain an auditor/assessor competence to the current standards under the MarinTrust programme in fishery assessments and factory audits as appropriate.

4.7. Continued Training and Competency Monitoring

Factory auditors shall be kept up to date with supply chain sector best practice, and have access to and be able to apply relevant Laws and Regulations. Fishery assessors shall be kept up to date with fishery management best practice and the relevant international laws and guidelines.

Factory auditors and fishery Assessors shall undergo additional Training arranged or delivered by the CB whenever new versions of the current standards under the MarinTrust Programme, Check Lists, Policies, Guidance Documents, etc., are issued. The CB shall maintain written records of all relevant training undertaken.

Training and Monitoring shall also include calibration across auditors/assessors to the current standards under the MarinTrust programme which will include factory audit and fishery assessment reports, reviews and comparisons etc.

Training and examinations are to be provided to each factory auditor and fishery assessor wishing to maintain their active status in line with MarinTrust Procedures B2 – Appointment of MarinTrust Fishery and By-product Fishery Assessors and B3 – Appointment of MarinTrust Factory & Chain of Custody Auditors.

An Approved Assessor shall complete a minimum of one MarinTrust Fishery Assessment or

Surveillance Assessment in a calendar year to maintain their Approval Status.

An Approved Auditor shall complete a minimum of two MarinTrust Audits to the relevant standards in a calendar year to maintain their Approval Status.

4.8. Factory Auditor & Fishery Assessor Attributes and Competencies

The CB shall have a system in place to ensure that auditors and, where relevant, fishery assessors conduct themselves in a professional manner. The following provide examples of required behaviour:

- Ethical, i.e. fair, truthful, sincere, honest and discreet.
- Open minded, i.e. willing to consider alternative ideas or points of view.
- Diplomatic, i.e. tactful in dealing with people.
- Observant, i.e. actually aware of physical surroundings and activities.
- Perceptive, i.e. instinctive, aware of and able to understand situations.
- Versatile, i.e. adjust readily to different situations.
- Tenacious, i.e. persistent, focused on achieving objectives.
- Decisive, i.e. timely conclusions based on logical reasoning.
- Self-reliant, i.e. acts independently whilst interacting effectively with others.
- Integrity – aware of need for confidentiality and observing professional code of conduct.

4.9. Conflict of Interest, Confidentiality and Code of Conduct

The CB and the auditors/assessors they employ must avoid any conflict of interest, or breach of confidentiality or ethics. The CB is bound by a Contractual Agreement with the Marine Ingredients Certifications Ltd to abide by these requirements. CBs shall also have signed agreements in place with all auditors/assessors registered to audit and assess against the MarinTrust programme. This Agreement shall include, at a minimum, the following types of topics:

- Prohibitions against conflict of interest.
- The requirement to divulge to the CB any potential conflict of interest (such as prior consulting, prior employment, and the like) before undertaking a factory audit or

fishery assessment, or that may arise during the audit or assessment.

- A policy for the CB to investigate notifications of, or incidences of, potential conflict of interest and to exclude the auditor/assessor for a specific period where appropriate.
- Prohibitions against consulting for, or soliciting - consultancy or other types of work with an MarinTrust programme applicant prior to, or during a factory audit or a fishery assessment, and during the Certification Process.
- Prohibitions against conduct or remarks that may, in the view of MarinTrust, disparage the Programme, Programme Management or Owner and related staff, Certified Facilities, or associated Organisations e.g. CBs or Accreditation Bodies.
- Prohibitions against using or sharing confidential information from the applicants audited and assessed.
- The CB shall include in the Auditor Agreements, as a minimum the above points, including specific Codes of Ethics/Conduct Obligations as outlined herein. Copies of these Agreements shall be provided to MarinTrust Secretariat upon request.
- The CB shall include in the Fishery Assessor Agreements, as a minimum the above points, including specific Codes of Ethics/Conduct Obligations as outlined herein. Copies of these Agreements shall be provided to MarinTrust Secretariat upon request.
- Any potential breaches of these requirements that come to the attention of MarinTrust by the CB or its auditors/assessors will be brought to the CB to formally discuss. Conversely, the CB is required to also notify MarinTrust of such matters that may come to their attention.

4.10. Subcontracted Factory Auditor/ Fishery Assessor

Where the CB's Approved auditors/assessors are independent subcontractors to the CB, all of the requirements detailed throughout this document relating to auditors/assessors and CB responsibilities concerning oversight, training, and competency of auditor, etc., shall apply.

The CB shall not, at any time, use any subcontracted auditors/assessors that have not been approved through the CB Auditor Approval Process.

4.11. CB Staff Specific Qualification Requirements

All relevant members of the CB's staff involved in the MarinTrust programme certification process shall attend an approved Auditor/Assessor Training Course, including any examinations forming a part of such a course as deemed necessary by MarinTrust.

Information on the relevant qualifications, training and experience of each member of staff

involved in the MarinTrust Programme Certification Process shall be maintained by the CB. Records of training and experience shall be kept up to date. These records shall include, as a minimum:

- Name and address.
- Organisation affiliation and position held.
- Educational qualifications.
- Experience and training related to Seafood processes, audit and assessment processes, review of assessment reports and corrective action evidence, and the relevant MarinTrust standard.
- Records, including dates, related to training and education.

Staff utilised by the CB to conduct auditor/assessor training, calibration and competency reviews shall also demonstrate proper experience, training and competencies as described above and be recognised by MarinTrust the trainer for the MarinTrust programme within the CB.

Records of CB personnel training, experience and competency shall be provided to MarinTrust upon request.

The Certification Review/Decision-making Group/Team/Committee shall be adequately staffed to ensure timely reviews and decision-making. As a minimum the committee must consist of at least two persons.

5. Communication

MarinTrust welcomes communications with CBs and information exchange. MarinTrust will, from time-to-time, seek CB input into the MarinTrust programme, related documents, and on the auditing, assessment and certification processes.

MarinTrust recognises the importance of Accreditation during the development of the entire MarinTrust Programme and certification process. It has consulted with (IAF) National Accreditation Bodies and experienced CBs to ensure that all requirements of Product/Process Certification are met. MarinTrust will continue to liaise with all approved CBs and Accreditation Bodies where appropriate in the further development of the Programme.

The CB must agree and communicate to MarinTrust the following:

- Any and all offices that offer to make certification decisions, and/or issue certification to MarinTrust programme shall be duly registered with MarinTrust and with their Accreditation Body.
- Each auditor is qualified to perform the auditing services he/she performs on behalf of the CB in accordance with the criteria set out herein and other related MarinTrust programme documents and has complied with all training and competency requirements.
- Each assessor is qualified to perform the fishery assessment services he/she performs on behalf of the CB in accordance with the criteria set out herein and other related MarinTrust programme documents and has complied with all training and competency requirements.
- The person(s) in the CB who is the designated trainer and monitor of MarinTrust approved auditors and fishery assessors.
- It maintains an accurate record of the qualifications of each auditor/assessor and the training undertaken by such auditor/assessors.
- Any changes in key personal- named representative and trainer who are engaged by the CB to manage the certification process of applicants to the MarinTrust programme.
- All factual information supplied to MarinTrust and/or the Accreditation Body by the CB is, or was when given, true, accurate and not misleading.
- The CB has the power and all necessary consents, licenses and registrations to conduct their business and to enter into and perform the contract.
- The CB has read, understood and shall comply with their obligations and requirements as laid out in this document and other MarinTrust programme documents.

6. Use of the MarinTrust Certification Logos

The MarinTrust logos are the property of Marine Ingredients Certifications Ltd and its authorisation and rules for use are controlled via an agreement between Marine Ingredients Certifications Ltd and certified applicants and registered CBs.

AMENDMENT LOG

DATE	ISSUE	AMENDMENT	AUTHORISED BY
Version 2 edits (MarinTrust conversion)			
July 2021	2.0	MarinTrust Header & Footer inserted	Libby Woodhatch
July 2021	2.0	Wording throughout document amended to read ' <i>MarinTrust</i> ', ' <i>MarinTrust Standards</i> ' or ' <i>Marine Ingredients Certifications Ltd</i> ' as appropriate	Libby Woodhatch
July 2021	2.0	Section 4.4 – update of document B3 title to explicitly include chain of custody standard.	Libby Woodhatch
July 2021	2.0	Section 4.5 – update of minimum audit day experience to reflect current practice and auditor appointment requirements	Libby Woodhatch