



Responsible Supply of Marine Ingredients

Standard for Responsible Supply Version 2.0

Requirements for certification

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MarinTrust Programme

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Foreword

The continued development of the global marine ingredients markets has resulted in the need for the industry to demonstrate its commitment to the responsible sourcing of raw materials and the safe production of ingredients for aquaculture, agriculture and directly in the production of consumer products.

With concerns over the sustainability of global fisheries and the fight against Illegal, Unreported and Unregulated Fishing (IUU) a key issue, the MarinTrust Governance Board has provided a platform to allow stakeholders to be able to better demonstrate their commitment to responsible sourcing and production of raw materials in the form of a Global Standard and Certification Programme for the Responsible Supply of Marine ingredients.

After much development, the initial Standard was finalised and the programme opened for applications in October 2009 with the first factory was IFFO RS (now know as MarinTrust) certified in February 2010. Later in 2012, IFFO RS achieved the International Organisation for Standardisation ISO Guide 65:1996 (EN45011), (now ISO/IEC 17065:2012) accreditation through its independent Certification Body. The third party certification bodies that have been approved by MarinTrust ensure the credibility, transparency and integrity of the MarinTrust standard.

Since its launch, the standard continued to grow from strength to strength and is now the leading standard in the certification of marine ingredient producing factories. The requirements for Certification of Responsible Supply are subject to regular review and improvement to ensure that it continues to serve MarinTrust stakeholders needs in the provision of safe, responsibly sourced marine ingredients for the International market. After 5 years since the launch of its factory standard, the MarinTrust Governance Board via its Technical Advisory Committee undertook a revision of the MarinTrust standard launching Version 2.0 in July 2017 in order to maintain, not only relevance but credibility and accessibility for all.

The MarinTrust Version 2.0 standard includes clauses on Good Manufacturing Practices, relevant to the production of marine ingredients, together with revised and new clauses in the social and environmental sections. There is also a new community engagement section. There have been a number of changes to the fisheries assessment part of the standard, to reflect the latest thinking in fisheries management, including the assessment of mixed fisheries within a single report.

MarinTrust certificate holders can further signify their compliance to the MarinTrust standard with our unique Certification Logo.

In accordance with the ISEAL Standard Setting Code, MarinTrust shall revise the MarinTrust standard at least once every 5 years. MarinTrust proposes to begin the revision process of this standard by July 2022.

Introduction

Scope and Applicability

This document defines the standards that shall be achieved for approval and certification to the [MarinTrust Global Standard for Responsible Supply of Marine Ingredients \(Requirements for Certification\) Version 2.0](#) and sets out the requirements that shall be achieved by industry for MarinTrust Certification of Responsible Supply for Marine Ingredients Production.

The MarinTrust Governing Board via its MarinTrust Technical Advisory Committee (TAC) (Standards Development) has developed and endorsed Version 2.0 of the MarinTrust Global Standard for Responsible Supply. Throughout the development of Version 2.0 the needs of the supply chain and interested parties including; marine ingredient producers, fishmeal and fish oil traders, fish feed producers, aquaculture standard holders, aquaculture seafood processors, retailers and international environmental NGO's, have been at the centre to safeguard representation throughout.

The Program is managed by the MarinTrust Governance Board (GB), who is responsible for the continued advancement of the MarinTrust standards to ensure they remain both credible and relevant with respect to the stated objectives.

To refer to the most updated MarinTrust Standard please refer to the MarinTrust Website: <https://www.marin-trust.com>

This Standard document outlines the requirements for Certification of Responsible Supply and defines the criteria for the sourcing and manufacturing of marine ingredients.

This Responsible Supply Standard will focus on **3 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 **objectives** of this Responsible Supply Standard 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.

This Standard document focusses on the responsible sourcing, production and traceability of material that is legal, safe and fished responsibly. An Applicant Marine Ingredient producer shall be able to demonstrate compliance to the criteria through accurate documentation, record keeping and manufacturing that is traceable to best practice. It sets realistic requirements that MarinTrust certificate holders can transparently meet and demonstrate their commitment and adherence to these responsibilities.

Key Eligibility Criteria:

To become certified Applicants shall be able to demonstrate the following:

Responsible Sourcing

- Demonstrate commitment to sourcing fishery material from legal, reported and regulated fisheries that comply with the key requirements of the FAO Code of Conduct for Responsible Fisheries.

Responsible Traceability

- Demonstrate through rigorous traceability systems that only approved fisheries are used in the manufacturing of MarinTrust compliant marine ingredients and demonstrate the avoidance of IUU fishery material from their supply.

Responsible Manufacturing

- Proof of responsible manufacturing including care for both workforce and environment
- Be in possession of all relevant and valid permits and licenses for the production and sale of marine ingredients products.

Third Party Audit and Assessments

Applicants shall be able to demonstrate compliance with this Standard to become a 'Certificate holder' of the Program. Audits are conducted by an independent and qualified Certification Body accredited to ISO/IEC 17065 by an Accreditation Board of the International Accreditation Forum.

The frequency of audit and assessment to maintain certified status was set by the MarinTrust Governing Board with guidance from interested and competent organisations and was based on the Applicant's demonstrated ability to consistently comply with the requirements of the MarinTrust Global Standard for Responsible Supply

The specified frequency of assessments are as follows:

For whole fish and by-product fisheries:

- Full re-assessment every three years with an annual surveillance assessment.

For marine ingredient factory production sites:

- Full re-audit every three years with annual surveillance audits

Recognition of Certification

To promote the co-existence of independent certification programmes and avoid un-necessary duplication of effort, the MarinTrust Global Standard for Responsible Supply recognises other certification programmes that have demonstrated equivalency and credible accreditation credentials.

A fishery certified to the Marine Stewardship Council's Principles and Criteria for Sustainable Fisheries, has been deemed by the MarinTrust Governing Body to meet the requirements demanded for the responsible use of whole fish as a raw material within the MarinTrust Global Standard for Responsible Supply.

Applicants with valid third party certificates from National or International Good Manufacturing Practice Certification Programmes may seek equivalency recognition to the relevant MarinTrust Requirements.

Further Information

Further information regarding application, rules and regulations of the program can be obtained from MarinTrust Ltd and/or the Approved Certification Bodies listed on the MarinTrust website.

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Approved Certification Bodies

See MarinTrust Website: <https://www.marin-trust.com/certification-bodies-approved-auditors>

Normative References

The normative documents from which this standard draws upon include:

- 1982 United Nations Convention on the Law of the Sea.
- 1995 FAO Code of Conduct for Responsible Fisheries (FAO CCRF).
- FAO Guidelines for the Eco-labelling of Fish and Fishery Products.
- Implementation of the International Plan of Action to Prevent, Deter and Eliminate Illegal, Unreported and Unregulated Fishing. Technical Guidelines for Responsible Fisheries No. 9.
- FAO Good Aquaculture Feed Manufacturing Practice. Technical Guidelines for Responsible Fisheries. No. 5, Suppl. 1.
- FAO Technical Guidelines on Aquaculture Certification.
- EC Regulation 1005/2008 establishing a Community system to prevent, deter and eliminate Illegal, Unreported and Unregulated (IUU) fishing.
- ISO 14024:1999. Environmental labels and declarations - Type 1 environmental labeling - Principles and procedures.
- IFSA International Feed Ingredient Standard and Rules of Certification.
- FEMAS Feed Materials Assurance Scheme Sector notes: Fishmeal and Crude Fish Oil July 2007.
- European Feed Manufacturers Guide (EFMC) January 2007.
- ISO/IEC Guide 59 CODE of good practice for standardization, MSC Principles and Criteria for Sustainable Fisheries Standard.

Legal References

Applicants shall fully meet the legal obligations that are in place for the jurisdiction(s) where marine ingredients are produced and supplied to be considered for certification.

Certification of an Applicant does not place any liability on MarinTrust Ltd. or any associated body involved in the development, implementation, auditing and issuing of certificates of this Program brought about through failure of an Applicant to meet their legal obligations.

SECTION 1: Responsible Sourcing Practices

1.1 Principles of Responsible Sourcing of Fishery Material

MarinTrust subscribes to and promotes the principles of the FAO Code of Conduct for Responsible Fisheries through the development and adoption of this Program.

Through its voluntary adoption, MarinTrust Certificate holders will further demonstrate their commitment to supporting the principles of sustainable fisheries development.

In order to become certified, Applicants shall demonstrate that they are sourcing raw materials from responsibly managed fisheries as defined in the 1995 UN FAO Code of Conduct for Responsible Fisheries and as described in this Standard.

Applicants should refer to section 1.3 for the key requirements of responsibly managed fisheries.

In this Standard to comply with the definition of Responsible Sourcing, the Applicant shall be able to demonstrate:

- The responsible sourcing of legal, regulated and reported fishery material and avoidance of material sourced from IUU fishing activity.
- Sourcing from fisheries that comply with the key requirements of the FAO Code of Conduct for Responsible Fisheries.

N.B. The assessment does not allow a fishery to make any claim against this Standard.

1.2 Responsible Sourcing Policy

1.2.1 The Applicant shall implement a documented Policy that commits them to the responsible sourcing of fishery material in accordance with this Standard.

1.2.2 The Applicant shall be permitted to use MarinTrust approved raw material in their scope if they have been granted this approval by MarinTrust Ltd.

1.2.3 The Applicant shall be only permitted to use MSC Certified raw material in their scope if they have a documented process in place to confirm the MSC Certified status of these raw materials upon receipt.

Where an applicant can demonstrate that they are sourcing from a fishery with valid MSC Certification the material will be automatically approved.

1.3 Responsible Sourcing of Fishery Raw Material

The following clauses are derived from Articles 7 and 8 of the FAO Code of Conduct for Responsible Fisheries. Applicants shall be able to demonstrate directly, or through an approved, independent and competent third party that each fishery that they source material from is compliant with the following criteria.

1.3.1 The Fishery Management Framework and Procedures

1.3.1.1 The management framework, system, or customary arrangement for the fishery shall include a legal, administrative and scientific basis for the development and implementation of measures and controls to support the conservation of the species, ecosystems and environments directly and indirectly affected by the fishery.

1.3.1.2 Stock assessments, management procedures and management outcomes shall be developed in consultation with stakeholders, and made publicly available.

1.3.1.3 There shall be systems and organisations in place to implement effective surveillance, control and enforcement programmes, and to apply sanctions when fishery laws and regulations are broken.

1.3.2 Stock Assessment Procedures and Management

1.3.2.1 Species which together make up at least 95% of total landings by weight shall meet the following requirements, OR there shall be strong evidence that the fishery is not putting the species at risk of over-exploitation:

1.3.2.1.1 There shall be sufficient scientific information collected to enable informed and responsible management of all stocks.

1.3.2.1.2 Stock assessments shall be conducted with sufficient frequency to permit the informed management of the stock; shall take into account the best available scientific information, and shall consider the entire biological stock.

1.3.2.1.3 There is a mechanism in place by which total fishing mortality can be controlled, and this mechanism is effective at maintaining fishing mortality within the levels recommended by scientific organisations.

1.3.2.1.4 Reference points (or proxies) are established for the stock, and the fishery is closed if the stock is determined to have fallen below the biomass limit reference point (or proxy).

1.3.2.2 Any other species regularly caught by the fishery, and raw materials sourced from by-products, shall meet the following requirements:

1.3.2.2.1 If the species is from a stock managed using reference points, the stock shall be within the defined limit reference point(s).

1.3.2.2.2 There shall be strong evidence that the fishery is not putting the species at risk of over-exploitation.

1.3.2.3 None of the species approved for use as an MarinTrust raw material shall appear in the CITES appendices, or be categorised by the IUCN as Endangered or Critically Endangered.

1.3.3 Fishery Impacts

1.3.3.1 The fishery management system shall monitor the impacts of the fishery on ETP species, and minimise these impacts to the extent practicable. The fishery shall not have a significant negative effect on ETP species, or place them at serious risk of extinction.

1.3.3.2 The fishery management system shall monitor the impacts of the fishery on the physical environment, and minimise these impacts to the extent practicable. The fishery shall not have a significant negative effect on the physical environment.

1.3.3.3 The fishery management system shall monitor the impacts of the fishery on aquatic ecosystems, and minimise these impacts to the extent practicable. The fishery shall not have a significant negative effect on aquatic ecosystems.

1.4 Reporting and Recording of Fishery Raw Materials

Each delivery of fishery material shall meet the following criteria in order for it to be eligible for use as approved raw material.

1.4.1 Whole Fish Fishery material shall be traceable to a fishery/fisheries approved as compliant to the MarinTrust Standard or certified to the MSC Standard, to be eligible for identification of MarinTrust

1.4.2 All whole fish fishery landings received by the Applicant shall be recorded and verified.

1.4.3 All raw materials shall only be sourced from legal, reported and regulated fishing activity.

1.4.3.1 Applicants shall provide evidence that their raw material is sourced from vessels that are not officially listed as engaging in illegal, unreported and unregulated (IUU) fishing activity.

1.4.4 The details of each consignment of fish from a vessel shall be recorded.

This shall include:

- I. Name of vessel, IMO/registration number, call sign, legal owner, name and address,
- II. Proof of authorisation to engage in the specific fishing activity,
- III. Date and time of discharge to facility,
- IV. Species and quantity discharged,
- V. Location or place(s) and dates of fishing activity where catch originated,
- VI. Fishing method used.

SECTION 2: Responsible Traceability Practices

2.1 Traceability of Marine Ingredients to Fishery

2.1.1 Applicants shall have a system in place to ensure that the production of compliant marine ingredients can be traced back to an approved fishery material. Where an Applicant is processing fishery material which originates from a fishery in the MarinTrust Improver Programme, the system shall also be able to trace this material as separate from MarinTrust approved material.

2.1.2 Applicants shall implement procedures that demonstrate the avoidance of raw materials that are sourced from Illegal, Unreported and Unregulated (IUU) fishing activity.

2.1.3 Applicants which produce marine ingredients that meets the requirements of this MarinTrust Standard shall have a system in place to keep it separate from marine ingredients that is produced from non-approved raw material. Applicants which produce marine ingredients using raw materials which originate from a fishery in the MarinTrust Improver Programme shall have a system in place to keep this separate from both fully approved and non-approved materials.

2.1.4 All compliant MarinTrust marine ingredients shall be identifiable with a defined positive batch identification system in order to be eligible for identification as compliant with the MarinTrust Standard.

2.1.5 Where the identity of eligible material is lost, (e.g. through mixing with ineligible material) or there is a potential loss in identity through loss in traceability, the subsequent batch shall no longer be identified as compliant with the MarinTrust Standard.

2.1.5.1 The Applicant shall conduct a mass balance yield exercise every year to test and record the amount of marine ingredients derived from each raw material category.

2.1.6 Applicants shall test the effectiveness of their batch control and traceability systems through a detailed documented internal audit conducted no less than once per annum for all marine ingredients.

2.1.7 The internal audit shall include:

2.1.7.1 Traceability of fishery material supply - Supplier Traceability.

2.1.7.2 Traceability of raw fishery material to finished product as it moves through processing and all storage stages (including external and third party storage) - Process Traceability.

2.1.7.3 Traceability of MarinTrust compliant marine ingredients to immediate customers- Customer Traceability.

2.1.7.4 The outcome of internal traceability audits shall be documented and shall include, evidence of performance through compliance reports, non-conformances, corrective and verification actions.

2.1.8 Applicants shall inform the Certification Body in the event of a recall within 48 hours of any dispatched compliant MarinTrust marine ingredients.

2.1.9 Applicants shall perform 1 recall exercise every 12 months and whenever necessary.

2.2 Record Keeping

2.2.1 Applicants shall ensure that all records required by this Standard are kept for a minimum of three years.

2.2.2 All records required to verify compliance with the MarinTrust Standard shall be accurate, legible and unadulterated.

SECTION 3: Responsible Manufacturing Practices

MarinTrust recognises that a high standard of responsible manufacturing should be demonstrated for certification to the Responsible Sourcing Standard. Applicants may demonstrate Responsible Manufacturing Practices by achieving and maintaining certification to the GMP+ Feed Certification scheme or recognised equivalent, or a Standard that has been approved by the MarinTrust Governance Board as being an equivalent.

Applicants demonstrating Responsible Manufacturing Practices via a separate certification shall also meet the other requirements of Section 3.1.

Factories without such a certification shall meet the requirements of Sections 3.2 – 3.7.

3.1 Factories certified to GMP+ or recognised equivalent, or to a Standard approved as equivalent by the MarinTrust GB

3.1.1 Certification shall be administered by either an ISO 17065 accredited Certification Body included in their accreditation scope by a member of the IAF Multilateral Agreement (MLA) or by a standard certification process that has been approved by the MarinTrust Governance Board as being an equivalent.

3.1.2 Current and valid certificates shall be available for each site registered on the MarinTrust Application Form that wishes to be certified to the MarinTrust Standard.

3.1.3 The outcome of external inspection and surveillance audits to the GMP+ or equivalent standard shall be made available including; reports of the performance, outcome, non-conformances and corrective actions associated with assessments conducted by the appointed Certification Body.

3.1.4 If applicable, Applicants that produce fish oil that is destined for direct human consumption shall have incorporated a specific HACCP plan to cover and control all the risks associated with this type of Fish Oil production.

3.2 Factories without certification to GMP+ or to an approved equivalent Standard

Applicants without certification to GMP+ or equivalent shall meet the following requirements (3.2.1 – 3.2.18). Applicants with such certification (as described in section 3.1, above) do not need to meet requirements 3.2.1 – 3.2.18.

3.2.1 Structure and Facilities

3.2.1.1 Facilities and equipment shall be designed to allow appropriate cleaning and disinfection and managed to avoid risks to the safety of raw materials and marine ingredients.

3.2.1.1.1 Facilities and equipment shall be designed to allow appropriate cleaning and disinfection and managed to avoid risks to staff safety.

3.2.1.2 Facilities shall be designed to reduce the risk of contamination of raw material from semi- and processed marine ingredients material particularly post critical control process points designed to eliminate microbiological hazards in the marine ingredients material.

3.2.1.3 Access to processing facilities and storage areas shall be organised to prevent cross contamination of processed materials from personnel operating in raw and semi-processed areas.

3.2.1.4 There shall be adequate lighting to ensure activities can be undertaken safely and efficiently.

3.2.1.5 Protective clothing shall be worn where the applicant has determined that there is a risk from personnel to marine ingredients ingredient contamination.

3.2.1.5.1 Protective clothing shall be worn where the applicant has determined that there is a risk to personnel health and safety.

3.2.2 Intake of Raw Fishery Material

3.2.2.1 Holds, containers and equipment of receiving vessels and overland transporters used for fishery raw materials shall be maintained in a clean and hygienic condition.

3.2.2.2 There shall be adequate facilities to receive, off-load and store fishery raw material from vessels and overland transportation before processing to prevent contamination and risk to marine ingredients safety.

3.2.2.3 Intake facilities shall be designed to ensure that access by birds and other ground pests is eradicated.

3.2.2.4 Dosing systems for additive inclusion shall be calibrated by competent persons and provide the correct and effective dosing levels for these approved additives at all times.

3.2.2.5 For bulk transported material, internal procedures and contractual agreements shall include provisions that preclude the use of transport that may adversely affect the safety of any raw materials due to the composition of a previous cargo.

3.2.3 Maintenance and Contractors

3.2.3.1 There shall be a preventative maintenance programme in place for the facility.

3.2.3.2 All lubricants and oils shall be stored in a designated non-production or non-product storage area to prevent a risk of contamination of marine ingredients materials.

3.2.3.3 There shall be procedures in effect for visitors and subcontractors to ensure the integrity of the product based on risk assessment.

3.2.4 Process Control Arrangements

3.2.4.1 All conveying, piping, storage tanks, bins and processing containers shall be made of smooth, impervious, non-toxic, materials and managed to reduce the risk of product contamination.

3.2.4.2 Water used in or associated with the process shall be of potable quality.

3.2.4.3 Water dosing systems used to ensure potable quality, water softening or anti-corrosion of equipment shall be calibrated and controlled to ensure the correct level of dosing of additives.

3.2.4.4 Checks on dosing rates, calibration and control shall be recorded and maintained.

3.2.4.5 All additives to water shall be authorised and shall not pose a risk to marine ingredients safety by their application.

3.2.4.6 Fixtures in process and storage areas that contain glass shall be protected to minimise the risk of contamination in the event of breakage.

3.2.4.7 Where mechanical drying of marine ingredients is undertaken, documented procedures shall ensure that it does not cause adverse effects on the marine ingredient safety.

3.2.4.8 In cases where air is used for conveying or cooling, the participant shall evaluate the risk of this becoming a contamination route for pathogens and take any necessary precautions.

3.2.4.9 Procedures shall include corrective actions to be taken in the event of critical process parameters being breached.

3.2.3.10 The production process shall have systems in place to reduce the risk of physical contamination from potential physical contaminants such as metal.

3.2.5 Hygiene, Cleaning, and Disinfection

3.2.5.1 There shall be thorough cleaning of all equipment and facilities to prevent contamination from pathogens, pests and dirt and foreign material.

3.2.5.2 Cleaning and disinfectant products shall not pose a risk to marine ingredients material contamination through their proper dilution, application and the use of secure storage.

3.2.5.3 Cleaning and disinfectant products shall not pose a risk to staff safety through their proper dilution, application and the use of secure storage.

3.2.5.4 The cleaning programme shall be documented for each major item of equipment and process area (reception, pumping, raw material storage, processing, storage, bagging, loading and dispatch).

3.2.5.5 Accurate records of cleaning activity and checks on efficacy shall be maintained.

3.2.6 Pest Control

3.2.6.1 An effective and continuous programme for the control of pests (including insects), which has an emphasis upon pest proofing and provision of a hostile environment, shall be maintained.

3.2.6.2 The Applicant shall either contract the services of a regulated pest control organisation, or shall have trained in company personnel, for the regular inspection and treatment of their premises to deter and eradicate infestation.

3.2.6.3 Detailed records of the location of bait stations, poisons, pest control inspections, recommendations and necessary action undertaken shall be retained.

3.2.7 Waste Management

3.2.7.1 All waste materials shall be stored in dedicated containers, held in separate areas so as to prevent contamination of marine ingredients materials or pest infestation.

3.2.7.2 There shall be adequate internal drainage contamination to maintain a clean work area and minimise health and safety risks.

3.2.7.3 Facility sewerage shall be contained by a separate closed system to that of the processing drainage system.

3.2.8 Packaging and Labelling

3.2.8.1 Packaging shall be designed to protect fishmeal during normal storage, handling and delivery conditions.

3.2.8.2 For marine ingredients sold in bulk, as well as in bags, delivery documents / labels shall include any details (such as Statutory Statements) required under Labelling Regulations in the country of production and / or receipt.

3.2.9 Storage Facilities

3.2.9.1 Fishmeal stores shall be designed, constructed and managed to prevent product contamination.

3.2.9.2 Storage facilities shall be dry, adequately ventilated to prevent condensation and reduce the risk of dirt and dust contamination.

3.2.9.3 Vehicles used to load and unload bulk stores shall be used solely for that purpose and managed through proper maintenance and hygiene to prevent contamination of product.

3.2.9.4 Environmental analysis for salmonella sp. shall be carried out in fishmeal storage areas according to the HACCP based risk assessment.

3.2.10 Loading and Transport

3.2.10.1 Transport (vessel holds, road/rail containers) shall be adequately controlled through hygiene procedures, inspection checks and records at loading with specific regard to cleanliness and absence of moisture or potential contamination.

3.2.10.2 Where the conditions of transport may present a risk to contamination, loading shall not take place until a thorough risk assessment, appropriate tests and corrective action have taken place to ensure that marine ingredients shall not be adversely affected.

3.2.10.2.1 The results of these mitigating activities shall be recorded.

3.2.10.3 The participant shall ensure that all intake and loading facilities are designed and constructed in a manner that maintains the safety of marine ingredients materials.

3.2.10.4 Loading shall not be carried out in conditions which will adversely affect the raw materials or marine ingredients materials being handled (e.g. inclement weather conditions).

3.2.10.5 For bulk transported material, internal procedures and contractual agreements shall include provisions that preclude the use of transport that may adversely affect the safety of any marine ingredients materials due to the composition of a previous cargo.

3.2.11 Hazard Analysis Critical Control Point (HACCP) systems

3.2.11.1 Applicants shall establish and maintain an effective Hazard Analysis Critical Control Points system (HACCP) specific to their own premises and appropriate to the nature and volume of the production to cover all marine ingredients production.

3.2.11.2 Formal procedures that control potential hazards on a site-wide basis, such as: pest control, cleaning, glass policies, training, raw material and marine ingredients ingredient specifications, etc., commonly referred to as prerequisites shall be in place prior to the establishment of the HACCP plan.

3.2.11.3 The HACCP plan shall be based on an assessment of risk, and shall identify which hazards are of such a nature that their elimination or reduction to acceptable levels is essential to the safe production of marine ingredients. In conducting the hazard analysis, the following should be taken into consideration:

- The likely occurrence of hazards and severity of their adverse health effects on consumer.
- The qualitative and/or quantitative evaluation of the presence of hazard.
- Survival and multiplication of micro-organisms of concern.
- Conditions leading to the above.

3.2.11.4 If applicable, Applicants that produce fish oil that is destined for direct human consumption shall have incorporated a specific HACCP plan to cover and control all the risks associated with this type of Fish Oil production.

3.2.12 HACCP Principles

3.2.12.1 Conduct a hazard analysis assessment on the Operation.

3.2.12.2 Determine the Critical Control Points (CCP's) in the system.

3.2.12.3 Establish Critical Limits for the critical control points identified.

3.2.12.4 Establish a system to monitor control of the CCPs.

3.2.12.5 Establish the corrective actions to be taken when monitoring indicates that a particular CCP is not under control.

3.2.12.6 Establish procedures of validation to confirm that the HACCP System is working effectively.

3.2.12.7 Establish documentation concerning all procedures and records appropriate to these principles and their application.

3.2.12.8 In formulating the HACCP plan, reference shall be made to relevant legislation or guidelines.

3.2.12.9 HACCP shall have senior management commitment and shall be implemented through agreed procedures. Reference to requirements for product safety shall include any measures identified in the HACCP.

3.2.12.10 The HACCP team leader or nominated team representative shall be able to demonstrate competence in the understanding of HACCP principles and their application.

3.2.12.11 Key personnel identified as HACCP Team members shall have appropriate training, product and process knowledge and experience.

3.2.12.12 All existing and new products shall be covered by the HACCP System, which shall be appropriately reviewed.

3.2.12.13 Through the HACCP System, the Company shall be able to demonstrate effective control of all operations critical to food safety.

3.2.12.14 The HACCP Team shall carry out regular reviews (at least annually) to verify that requirements of the HACCP plan are being met in practice and that the plan effectively and consistently ensures that the applicant produces safe marine ingredients materials.

3.2.13 HACCP Internal Auditing

3.2.13.1 The Applicant shall audit all HACCP and prerequisite systems, procedures and specifications critical to product safety, legality and quality as part of the Internal Audit Procedures.

3.2.14 HACCP Documentation and Records

3.2.14.1 Data used in the hazard analysis.

3.2.14.2 Specification of product and materials used.

3.2.14.3 Monitoring procedures for CCP's.

3.2.14.4 CCP monitoring records physically or electronically signed and dated by responsible person.

3.2.14.5 Results of Internal (and external) Audit reports, non-conformances and corrective actions and minutes produced at meetings.

3.2.14.6 A record shall be kept of HACCP reviews showing the HACCP Team findings and any actions implemented.

3.2.14.7 A document control procedure shall be in place for all HACCP documentation.

3.2.15 Marine ingredients Specifications

3.2.15.1 Each marine ingredient product shall have a written specification that is made available to purchasers and potential purchasers of the marine ingredients materials offered by the participant.

3.2.15.2 The Specification shall confirm whether the marine ingredient is a compliant MarinTrust material.

3.2.16 Inspection, Sampling and Analysis

3.2.16.1 Applicants shall have representative inspection regimes in place that ensure the safety of all raw materials on arrival and marine ingredients on despatch.

3.2.16.2 Inspections shall include, as appropriate, assessment of physical form; odour; contamination by insect pests, droppings and other extraneous matter; mould; and compliance with specification.

3.2.16.3 Samples of the finished materials shall be labelled to facilitate traceability and retained in appropriate conditions for a minimum period of six months.

3.2.16.4 Applicants shall undertake sampling and analysis of marine ingredients to establish that it meets the statutory standards for the permitted concentration of an additive such as anti-oxidants.

3.2.16.5 The sample and testing plan shall be based on a HACCP based risk assessment for undesirable substances.

3.2.16.6 Where results fall outside of expected range, non-conforming product shall be identified, separated and where appropriate, disposed of in a legal manner.

3.2.16.7 Records shall be available to document the final disposition of any non-conforming material.

3.2.16.8 Testing laboratories shall be approved by one or more of the following methods:

- I. Accreditation by a nationally recognised accreditation authority according to EN/ISO-17025 for the test under consideration;
- II. Validation by taking part in relevant ring tests.

3.2.17 Calibration of Measuring Equipment

3.2.17.1 All inspection, measuring and test equipment used to confirm that raw, in process and finished marine ingredients materials meet specified marine ingredients safety requirements shall be calibrated at intervals not exceeding 12 months.

3.2.17.2 Records of calibration shall be maintained.

3.2.18 Assessment of Suppliers

3.2.18.1 Applicants shall ensure that supplies of additives and technical processing aids are included in the risk based assessment according to HACCP principles.

SECTION 4: Fish By - products

This section permits the inclusion of fish y-products in fishmeal or fish oil from fish processing and/or aquaculture as raw material on the basis that, where applicable the applicant is also in compliance with the preceding relevant clauses contained in this Standard.

4.1 Raw Fishery Materials from Fish By-products produced during processing

Raw material originating from fish processing operations may only be used to produce fishmeal or fish oil if it meets the following criteria:

4.1.1 The Fish By-product shall come from fish that is intended for human consumption. The applicant shall have a document policy stating this.

4.1.2 The Fish By-product shall not be of a species which is categorised by the IUCN Red List as Endangered or Critically Endangered (or higher), or of a species which appears in the CITES appendices.

4.1.3 If the stock from which the by-product is sourced is managed using reference points, the stock shall be considered to be above the limit reference point, or removals by the fishery under assessment considered negligible.

4.1.4 If the stock from which the by-product is sourced is not managed using reference points, and the species is categorised as vulnerable via a PSA, the impacts of the fishery on the species shall be considered during the management process, and reasonable measures shall be taken to minimise these impacts.

4.1.5 The Fish By-product shall meet and be handled according to the requirements of the GMP+ or equivalent certification programme that is recognised by the MarinTrust GB and in compliance with clause 3.2.2.5, which include: no contamination with Land Animal Protein (LAP), chemical, biological or physical agents

4.1.6 The Applicant shall be able to trace the origin of material back to the supplying fish processor or handler and by species or mix of species included in the receiving batches.

- Records of the above shall be maintained (**4.1.1, 4.1.5 + 4.1.6**)

4.2 Raw Fishery Materials from Aquaculture

Raw material originating from aquaculture production may only be used to produce fishmeal or fish oil if it meets the following criteria:

- 4.2.1** They shall show no clinical signs of disease on the day of receipt (EU Reg 1774/2002).
- 4.2.2** They shall not come from a farm which is subject to a prohibition for animal health reasons and shall not have been in contact with animals from such a farm.
- 4.2.3** They shall be kept segregated and clearly labelled as marine ingredients of the species that they originate from including circumstances where they are mixed with other raw materials both before and post processing (EU Reg 811/2003).

SECTION 5: Social Accountability

5.1 The Applicant shall have a documented policy that demonstrates compliance with their national legislation to ensure that their marine ingredient products are manufactured in compliance to all relevant employment, welfare and safety requirements as stated in this section. If no legislation is documented by their national government the applicant will need to have its own polices to comply with all the requirements of this section.

5.2 The Applicant shall have a written policy on fair operating practice, which is made available to managers and key personnel of the company. At a minimum, this shall cover bribery, corruption and inappropriate political lobbying or contributions.

5.3 The Applicant shall ensure that all staff have the correct visa/work permit to comply with their current national employment regulations.

5.4 The Applicant shall conduct a documented annual self-assessment against all relevant social laws. All non-compliance shall be documented, with action plans to address and monitor the non-compliance.

5.5 The Applicant shall have a procedure stating how to record health and safety related accidents and incidents with the associated corrective actions available to employees. As a minimum, this shall cover the process to record the incident in a database and to take corrective action.

5.6 The Applicant has documentation available which demonstrates that a clearly identified, named employees' representative and / or an employees' council representing the interests of the employees to the management is elected, or appointed or nominated by all employees and recognised by the management. This person shall be able to communicate complaints to the management.

5.7 An Applicant shall have a complaint procedure in existence, the employees have been informed about its existence that complaints or suggestions can be made.

5.7.1 The complaint procedure shall specify a time frame to resolve complaints.

5.7.2 Complaints and their solutions from the last 3 years are documented and accessible.

5.8 The Applicant can document that the management and the employees' representative have signed and displayed a self-declaration assuring good social practice and human rights of all employees.

5.8.1 The employees have been informed about the self-declaration and it is reviewed at least every 12 months years and whenever necessary.

5.9 The Applicant can demonstrate that the responsible person for workers' health and safety and the employees' representative(s) have knowledge and/or access to national regulations concerning: gross and minimum wages, working hours, union membership, anti-discrimination, child labour, labour contracts, holiday and maternity leave, medical care and pension/gratuity.

5.10 The Applicant shall have a contract for each employee containing the following:

5.10.1 Both the employees as well as the employer have signed them.

5.10.2 Records contain at least full names, nationality, a job description, date of birth, the regular working time, wage and the period of employment.

5.10.3 Records of all employees (also subcontractors) shall be accessible for at least 3 years.

5.11 The Applicant can show adequate documentation of the salary transfer (e.g. employee's signature on pay slip, bank transfer).

5.11.1 Employees sign or receive copies of pay slips / pay register that make the payment transparent and comprehensible for them.

5.11.2 Regular payment of all employees during the last 3 years is documented.

5.12 The Applicant can document that wages and overtime payment are documented on the pay slips / pay registers indicate compliance with legal regulations (minimum wages) and/or collective bargaining agreements (if applicable).

5.12.1 If payment is calculated per unit, employees shall be able to gain at least the legal minimum wage (on average) within regular working hours.

5.13 The Applicant can show records indicating compliance with national legislation regarding minimum age of employment.

5.13.1 If not covered by national legislation, children below the age of 15 are not employed.

5.13.2 If personnel between the ages of 15 to 18 are hired part time, they are not engaged in work that is dangerous to their health and safety that jeopardises their development or prevents them from finishing their compulsory school education.

5.14 The Applicant shall demonstrate that they have communicated with their raw material suppliers the national social regulation requirements.

SECTION 6: Environmental Accountability

6.1 The Applicant shall have a documented policy that demonstrates compliance with their national legislation to ensure that their marine ingredients products are manufactured in compliance to all relevant environmental requirements as stated in this section. If no legislation is documented by their national government the applicant will need to have its own polices to comply with all the requirements of this section.

6.2 The Applicant shall provide copy of permits (when applicable) for environmental emissions regulations as the legislation relates to:

- Emissions to air
- Discharge to water
- Release of toxic or hazardous substances
- Noise, smell and dust pollution
- Ground pollution

6.3 The Applicant shall provide documentation in order to demonstrate compliance with the requirement specified in permits from 6.2. In the case of non-compliance, all non-compliance shall be documented, with action plans to address and monitor the non-compliance.

6.4 The Applicant shall have a written assessment that identifies relevant environmental issues and the provisions made to address the associated risks have been conducted.

6.4.1 Management is able to demonstrate awareness of the identified issues and the provisions made to address the associated risks.

SECTION 7: Community Engagement

7.1 The Applicant shall have a written evaluation of the potential impacts of direct operations on the local community.

7.1.1 There shall be documentation showing the measures taken to avoid, mitigate and/or compensate for negative impacts on the local community.

7.2 There shall be documentation showing the involvement in regular engagement with local community representatives and organizations.

7.3 There shall be records of community complaints and the associated corrective action taken to address their concerns.

Annex 1: Glossary of Terms

Accreditation

Accreditation provides assurance, through independent assessment by a recognised accreditation body that Certification Bodies responsible for conducting conformity assessments according to standards are competent to carry out such tasks.

Accreditation Board

Authoritative Body that performs accreditation and is an agency that has the jurisdiction to formally recognize the competence of a certification body to provide certification services.

Annual Surveillance Assessment/Audits

Follow-up audit(s) to assess compliance with the specific requirements of MarinTrust scheme's Standards and to verify the validity of an issued certificate for both the Factory and Chain of Custody Standard Clients.

Applicant Bodies

Applicant Bodies are separate legal entities from MarinTrust, Certification Bodies and Accreditation Bodies and pay for the costs of assessment directly to Certification Bodies.

Approved Fishery Applicants

These are fisheries that supply the raw material for the applicant factories to the MarinTrust Standards and will need to be assessed and approved prior to them being allowed for use as a raw material.

Aquatic Ecosystem

An ecosystem in a body of water; for the purposes of MarinTrust Assessments, the ecosystem(s) within which the fishery is conducted.

Assessors/Auditors

A person qualified to carry out fishery assessment or factory audits for or on behalf of a Certification Body.

By catch

By catch refers to all non-target species that are retained as part of the catch.

Certification

Certification is the procedure by which a body or entity gives written or equivalent assurance through a process of assessment according to defined procedures that an operation or activity under consideration conforms to the relevant certification standards.

Certification Bodies

A provider of certification services, accredited to do so by an Accreditation Body.

Certification Body Assessment/Audit

A systematic and functionally independent examination to determine whether activities and related results by an applicant to the MarinTrust Standard comply with the conforming criteria of the programme.

Clients

An Applicant company or multi-site organisation in the supply chain that has been formally certified by the Certification Body as meeting either the MarinTrust Factory Standard or Chain of Custody Standard.

Conformance Criteria

A document of standard performance indicators used by an assessor/auditor to measure and record compliance of an applicant/client with one of the MarinTrust Standards.

Continual Improvement

Continual improvement is a set of recurring activities that are carried out in order to enhance performance. Continual improvements can be achieved by carrying out audits, self-assessments, and management reviews. Continual improvements can also be realized by collecting data, analysing information, setting objectives, and implementing corrective and preventive actions.

Discards

Non-retained by-catch.

ETP species

Endangered, Threatened and Protected (ETP) species are defined for the purposes of the MarinTrust assessment as those which either:

- Appear in the CITES appendices, or;
- Are categorised by the IUCN as Endangered or Critically Endangered.

Full Assessment/Audit

The spectrum of assessment and certification activities starting at factory application and ending at factory certification. These includes validation assessment site visits, full assessment desktop activities for the raw material, peer review, and the process leading up to certification.

HACCP

Hazard Analysis and Critical Control Point. HACCP is a systematic preventive approach to food safety from a biological, chemical and physical hazard in production processes that can cause the finished product to be unsafe. It designs measurements to reduce these risks to a safe level.

HACCP Plan

A HACCP plan is a written document that describes the procedures for maintaining control of potentially hazardous food at the critical control points of marine ingredient preparation and processing.

MarinTrust Logo

The MarinTrust Logo is part of the MarinTrust Factory Programme. This logo denotes that all fishmeal and fish oil originate from manufacturing plants that have been certified as in compliance with the MarinTrust Standard.

IUU

- Illegal Fishing – fishing conducted by vessels of countries that are part of a fisheries organisation but which operate in violation of its rules, or operate in a countries waters without permission, or on high seas without showing a flag or other markings.
- Unreported Catches – catches not reported to the relevant authorities by the fishing vessels or flag state, whether they are parties or not of the relevant fisheries organisation. This includes miss-reported and underreported catches.
- Unregulated Fishing – normally conducted by vessels flying the flag of countries they are not parties of or applicants in relevant fisheries organisations and therefore consider themselves not bound by their rules

The Limit Reference Points (LRP)

LRP are maximum values of fishing mortality or minimum values of the biomass, which shall not be exceeded. Otherwise, it is considered that it might endanger the capacity of self-renewal of the stock.

Management

Management refers to all the activities that are used to coordinate, direct, and control organizations. These activities include developing policies, setting objectives, and establishing processes to achieve these objectives.

Non-conformity

Nonconformity is a nonfulfillment or failure to meet a requirement. A requirement is a need, expectation, or obligation.

Normative Reference ISO/IEC 17065 – ISO 17065 Accreditation

Certification requirements for Certification Bodies to certify an applicant to one of the MarinTrust Standards to give transparency and confidence to all interested parties, that all certified clients will meet all the specified requirements of the MarinTrust Programme.

Policy

A policy is a general commitment, direction, or intention and is formally stated by top management. A quality policy statement should express top management's commitment to the implementation and improvement of its quality management system and should allow managers to set quality objectives.

Precautionary Principle

Accounting for uncertainty in the formulation of fisheries management measures to ensure the long-term conservation of the marine resource.

Provider/supplier

A provider/supplier is a person or an organization that supplies or provides products or services. Providers/suppliers can be either internal or external to the organization. Internal providers supply products or services to people within their own organization while external providers supply products or services to other organizations.

Physical environment

Any solid or semi-solid surface which can be impacted by a fishery, including seabed, seagrass beds, coral reef, etc.

Quality Management

Quality Management includes all the activities that organizations use to direct, control, and coordinate quality. These activities include formulating a quality policy and setting quality objectives. They also include quality planning, quality control, quality assurance, and quality improvement.

Quality Management System

A Quality Management System (QMS) is a set of interrelated or interacting elements that organisations use to formulate quality policies and quality objectives and to establish the processes that are needed to ensure that policies are followed and objectives are achieved. These elements include structures, programs, practices, procedures, plans, rules, roles, responsibilities, relationships, contracts, agreements, documents, records, methods, tools, techniques, technologies, and resources.

Record

Information created, received, and maintained as evidence and information by an organization or person, in pursuance of legal obligations or in the transaction of business.

Reference Points

Biological Reference Points ((BRP) Target and Limit) and Stock Status Reference Points used to define management action in response to stock status.

The Target Reference Points (TRP)

TRP are BRP defined as the level of fishing mortality or of the biomass, which permit a long-term sustainable exploitation of the stocks, with the best possible catch.

Traceability

Traceability is the ability to identify and trace the history, distribution, location, and application of products, parts, materials, and services. A traceability system records and follows the trail as products, parts, materials, and services come from suppliers and are processed and ultimately distributed as final products and services.

Verification

Process that uses objective evidence to confirm that specific requirements have been met. Whenever specified requirements have been met, a verified status is achieved. Verification can be made by 1st, 2nd or 3rd parties.

Annex 2: Fish By-product Assessment

Methodology

Definition of a Fish By-product

A by-product is a useful and marketable product that is not the primary product being produced. A marketable by-product is from a process that can technically not be avoided. This includes materials that may be traditionally defined as waste such as industrial scrap that is subsequently used as a raw material in a different manufacturing process.

"Fish By-products" refers to commodities that are manufactured from fish, including shellfish, and crustaceans in a form that is different than conventional foods and which are intended for human consumption (either directly or as a food ingredient). Fish By-products include, but are not limited to:

- By-products derived from fish, including fish cartilage, fish oils, and fish proteins; and
- By-products derived from the carapaces of crustaceans; but do not include marine plants or marine plant products.

(Canadian Food Inspection Agency Definition)

In addition, a whole fish which is rejected on an intrinsic quality ground e.g. does not meet the specification for human consumption due to physical damage or the quality is substandard. These whole fish shall in these cases be classified as a by-product from the human consumption fishery, and can be used for marine ingredients production.

A whole catch of fish that is rejected by a fish processing factory on economic grounds is not considered to be a fish by-product. This fish can only be used for marine ingredients production if the fishery has been assessed and approved under the requirements of the MarinTrust Responsible Sourcing Standard.

Why utilise Fish By-products?

FAO Code of Conduct for Responsible Fisheries

General Principles Article 6

6.7 The harvesting, handling, processing and distribution of fish and fishery products should be carried out in a manner which will maintain the nutritional value, quality and safety of the products, reduce waste and minimize negative impacts on the environment.

Responsible fish utilisation Article 11.1

11.1.8 States should encourage those involved in fish processing, distribution and marketing to reduce post-harvest losses and waste.

Benefits of Including Fish By-Products in the MarinTrust Standard:

- Improved fish resource utilisation
- Reduction in waste for nutritional value
- 35% of fish by-products are currently used to make quality fishmeal and oil
- Excellent Economic return
- Better compliance with FAO Code of Conduct for Responsible Fisheries

What Fish By-products cannot be used?

1. IUCN

Fishery By-products shall Not be taken from a species listed by IUCN (the International Union for Conservation of Nature) under the Red List for certain categories;

- EXTINCT (E) AND EXTINCT IN THE WILD (EW)
- CRITICALLY ENDANGERED (CR)
facing an extremely high risk of extinction in the wild.
- ENDANGERED (EN)
facing a very high risk of extinction in the wild.

Fish By-product material may be used from the vulnerable category, but it shall incur a fishery surveillance conducted by the certification body prior to it being included in the scope of this standard.

- VULNERABLE (VU)
facing a high risk of extinction in the wild.

The Fish By-product material from these species will be acceptable for use in the scope of this standard;

- NEAR THREATENED (NT)
does not qualify for above now, but is close or is likely to qualify for, a threatened category in the near future.
- LEAST CONCERN (LC)
Widespread and abundant.

Fish By-product material may be used from the following category, but it shall incur a fishery surveillance prior to it being included in the scope of this standard;

- DATA DEFICIENT (DD) and NOT EVALUATED (NE)

The fishery surveillance conducted by the certification body will review the following areas:

Stock Assessment

- From a recognised Institution
- Fisheries are recognised as legal
- Fisheries do not contradict scientific opinion

2. FAO Code of Conduct for Responsible Fisheries

In addition the Fish By-products shall not come from fisheries that do not comply with the following criteria;

1. Fisheries should prohibit dynamiting, poisoning and other comparable destructive fishing practices.
2. Fishery material shall not be from IUU fishing activity nor sourced from vessels officially listed as engaging in illegal, unreported and unregulated (IUU) fishing activity.

Sources of Information

1. Food Standards Agency
2. Canadian Food Inspection Agency
3. DEFRA
4. GAA Feed mill BAP standard
5. EU Commission
6. IUCN

Annex 3: Acknowledgement

The MarinTrust Governance Body Committee would like to thank the members of the Technical Advisory Committee for their commitment and contributions throughout the development of the new version of the Global Standard for Responsible Supply of Marine Ingredients (MarinTrust V2.0).

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Niels Alsted	Biomar (Feed Manufacturer's Representative)	Denmark
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David Parker	Youngs / Findus, (Fish Processor)	UK
Daniel Lee	Best Aquaculture Practices (Standard holder)	UK
Piers Hart	World Wildlife Fund (ENGO)	UK
Ally Dingwall	J. Sainsbury (Retailer)	UK
Michiel Fransen	Aquaculture Stewardship Council (Standard holder)	Netherlands
Duncan Leadbitter	Tropical fisheries expert	Australia
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Estelle Brennan	Lyons Seafood (Fish Processor)	UK

Introduction	Re-defined Section 'This document defines the standards that shall be achieved for approval to the IFFO Responsible Sourcing Standard (Requirements for Certification) Issue 1 Rev 2'.
Clause 4.1.6	Removal of 'Species that appear on the endangered list that can be scientifically proven to be from discrete sub populations, which are not considered on the above list, may be eligible for approval subject to qualification approval by the IFFO RS standard certification committee'.
Clause 4.1.6	Re-defined and re-numbered Clause (was 4.1.7) 'Species that appear on the endangered list that can be scientifically proven to be from discrete sub populations, which are not considered on the above list, may be eligible for approval subject to qualification approval by the IFFO RS standard certification committee'.
Clause 4.1.7	Re-numbered Clause (was 4.1.8).
March 2012	<p>Revision of wording for consistency and clarity of terminology throughout the Standard.</p> <p>Revision of wording to "recognition" and certification validity period.</p>
July 2013	<p>Revision of wording for consistency and clarity of terminology throughout the Standard.</p> <p>Replacement of wording "Technical Advisory Committee" for "IFFO RS Governing Board"</p>

Amendments Log

April 2014	<p>Addition of new IFFO RS Governing Board members and new IFFO and IFFO RS logos</p> <p>Change of IFFO's Head Office details</p> <p>Removal of IFFO membership as key eligibility criteria</p>
June 2014	<p>Addition of following sections</p> <p>SECTION 5: Social Accountability</p> <p>SECTION 6: Environmental Accountability</p> <p>SECTION 7: Legislative Compliance</p>
2016/17	<p>Extensive revisions for Version 2, including:</p> <ul style="list-style-type: none">• Complete revision of fishery requirements (Section 1)• Revision of traceability requirements (Section 2)• Addition of large number of new factory requirements to allow assessment of factories without GMP+ (Section 3.2)• Revision of by-product requirements (Section 4)• Revision of relevancy and addition of more evidence based criteria for social accountability (Section 5)• Revision of relevancy and addition of more evidence based criteria for environmental accountability (Section 6)