

MarinTrust V2

Global Standard for Responsible Supply

| Company Details | | | | |
|--------------------------------------|------------------------------|-----------------|---|-----------------|
| Site-Code : | | | | |
| Company Name : | | | | |
| Site Name : | | | | |
| Address : | | | | |
| Country : | | | Postcode : | |
| Telephone : | | | Fax : | |
| Company Representative Name : | | | Email : | |
| Site Representative Name : | | | Email : | |
| Audit/Auditor Details | | | | |
| Auditor Names : | | | GMP+/FEMAS(or equivalent) Cert No and Expiry Date: | |
| Audit Date : | Previous Audit Date : | | | |
| Key Personnel | | | | |
| Name/Job Title | Present at Audit (x) | | | |
| | Opening Meeting | Site Inspection | Procedure Review | Closing Meeting |
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| | | | | |
| Audit Duration Details | | | | |
| On-site audit duration | man hours | | | |



Raw Material Scope

Fishery (Auditor Note: Please list all the approved fisheries that the applicant is sourcing from)

| MSC Certified Fishery | | MarinTrust Approved Fishery | Common Name | Latin Name | Fishery Region | Supplier |
|-----------------------|------------------|-----------------------------|---|------------|----------------|----------|
| Yes/No | MSC Fishery Code | Yes/No | | | | |
| | | | See Guidance below. If in doubt, verify this info on the MarinTrust website https://www.marin-trust.com/marintrust-approved-whole-fish . | | | |
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Fishery By Product: (Auditor Note: Please list all the approved by-product fisheries that the applicant is sourcing from)

| MSC Certified Fishery | | MarinTrust Approved Fishery | Common Name | Latin Name | Fishery Region | Supplier |
|-----------------------|------------------|-----------------------------|---|------------|----------------|----------|
| Yes/No | MSC Fishery Code | Yes/No | | | | |
| | | | See Guidance below. If in doubt, verify this info on the Marintrust website https://www.marin-trust.com/marintrust-approved-products | | | |
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Aquaculture By-product: (Auditor Note: Please list all the approved Aquaculture By-products that the applicant is sourcing .)

| | | | Common Name | Latin Name | Supplier |
|--|--|--|---|------------|----------|
| | | | See Guidance below. If in doubt, verify this info on the MarinTrust website https://www.marin-trust.com/marintrust-approved-products | | |
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Summary

Company / Site Profile

| Clause No & Requirement | Conforms Y, N or NA | Details |
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| SECTION 1 – RESPONSIBLE SOURCING PRACTICES | | |
| 1.2 Responsible Sourcing Policy | | |
| <p>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.</p> | <p>FULL COMPLIANCE</p> | <p>The applicant site has a written commitment to the MarinTrust standard and has a document that states that they will only source from approved MarinTrust approved fisheries and by product fisheries for products bearing the MarinTrust statement or logo. This document will need to be approved by the site's CEO or an equivalent senior manager.</p> <p>If the Raw material is sourced from MSC certified fisheries these are automatically approved fisheries and the applicant will have a documented policy stating this fact.</p> |
| <p>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.</p> | <p>FULL COMPLIANCE</p> | <p>The applicant has to be able to demonstrate that all fish raw material to be used within the scope of certification to be approved to use by MarinTrust Ltd. This confirmation can be via email from MarinTrust secretariat or via any other evidence such as the respective registration (initial or scope extension) or</p> |
| <p>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.</p> | <p>FULL COMPLIANCE</p> | <p>Documented process is in place to confirm the MSC certified status of MSC certified raw materials upon receipt</p> |

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.

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| <p>1.4.1 - Whole Fish Fishery material shall be traceable to a fishery/fisheries approved as compliant to the MarinTrust Standard, or to an certified MSC fishery, to be eligible for identification of MarinTrust</p> | <p>FULL COMPLIANCE</p> | <p>The applicant must be able to demonstrate that they have procedures and documented evidence to prove that all the whole fish material that will be used for the production of MarinTrust material can be traced back to the fisheries they were sourced from. These fisheries must either be MarinTrust approved or MSC certified.</p> <p>The auditor should note that MarinTrust fishery assessments approve specific species. It is recognised that all fisheries produce some level of bycatch; therefore, the whole fish material used by the applicant is unlikely to consist entirely of approved species. If each individual non-approved species represents less than 5% (by weight) of a landing, the landing can be treated as entirely MarinTrust. However, if any single non-approved species regularly makes up more than 5% of landings, that species should be subjected to a full MarinTrust fishery assessment before such landings can be considered approved for the requirements of this criterion unless the fishery management plan for the species specifically recognises that a higher percentage level of by catch is permitted and has been accounted for.</p> <p>The Auditor shall give a brief summary of the traceability system: from catch, Landing, transfer to the plant, intake, production, dispatch.</p> |
| <p>1.4.2 - All whole fish fishery landings received by the Applicant shall be recorded and verified</p> | <p>FULL COMPLIANCE</p> | <p>The applicant has a record of each landing made to it for all the whole fish used in the plant that is destined for use as raw material for complaint MarinTrust Fish meal and oil. If the fishery regulations states that each landing must be oversee by the national control body which has jurisdiction over the fishery, these records should be available as well for all consignments used in the Factory. In most cases the fish meal plant will have to record the landing by weight and species and report this back to the regulatory authorities if an inspector is not present at the time of landing.</p> <p>The Auditor shall review and verify that these records are accurate and up to date. For reference the auditor should review the whole fish approval report to establish what requirements are necessary for the landing of this whole fish material. The most up to date approval reports can be located on https://www.marin-trust.com/marintrust-approved-whole-fish.</p> |
| <p>1.4.3 - All raw materials shall only be sourced from legal, reported and</p> | <p>FULL COMPLIANCE</p> | <p>The Applicant has a policy that states that raw materials are only sourced from legal, reported and regulated fishing activity and have robust and manged documentation for all raw materials demonstrating that they are legal and not IUU</p> |

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| 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 | FULL COMPLIANCE | The Applicant has a policy that states that raw materials are only sourced from legal, reported and regulated fishing activity and have robust and managed documentation for all raw materials demonstrating that they are legal and not IUU |
| 1.4.4 - The details of each consignment of fish from a vessel shall be recorded. This shall include: | FULL COMPLIANCE | The applicant will be able to provide all the information asked in the following six (6) sub criteria for each consignment of fish used in this plant that will be used as a raw material for the MarinTrust compliant fish meal and oil |
| (i) Name of vessel, IMO/registration number, call sign, legal owner, name and address, | FULL COMPLIANCE | Confirmed that all this information is clearly identified on all records that related back to the whole fish that is utilised within this factory |
| (ii) Proof of authorisation to engage in the specific fishing activity, | FULL COMPLIANCE | Confirmed that all this information is clearly identified on all records that related back to the whole fish that is utilised within this factory |
| (iii) Date and time of discharge to facility, | FULL COMPLIANCE | Confirmed that all this information is clearly identified on all records that related back to the whole fish that is utilised within this factory |
| (iv) Species and quantity discharged, | FULL COMPLIANCE | Confirmed that all this information is clearly identified on all records that related back to the whole fish that is utilised within this factory |
| (v) Location or place(s) and dates of fishing activity where catch originated, | FULL COMPLIANCE | Confirmed that all this information is clearly identified on all records that related back to the whole fish that is utilised within this factory |
| (vi) Fishing method used, | FULL COMPLIANCE | Confirmed that all this information is clearly identified on all records that related back to the whole fish that is utilised within this factory |
| 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 | FULL COMPLIANCE | The applicant will have an active list of approved fisheries and by-product fisheries and be able to demonstrate that they have a working system to be able to trace back the marine ingredients to |

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| <p>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.</p> | | <p>the approved fishery material. Information to include - Names of vessel/owner/registration: Date of landing-species quantity, Details of testing</p> |
| <p>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.</p> | <p>FULL COMPLIANCE</p> | <p>The applicant will have a policy backed up by procedures that will determine that they are aware of potential IUU fish and what actions they will take to ensure that this will not occur for any of the raw material that they source. This will entail reviewing a recorded list of illegal fishing vessels, consulting with the regulatory authorities, etc. Before the applicant will accept a vessel to supply its operation. In the case of by product material the applicant will need to gain a written commitment from the supplying processor that they have polices in place to avoid the use of IUU fish.</p> <p>The applicant will also be able to demonstrate that all its employees are aware of this policy and the enforcement procedures to ensure that the possibility of any unofficial landing coming into the plant is kept to the absolute minimum.</p> |
| <p>2.1.3 - Applicants that produce marine ingredients that meets the requirements of this MarinTrust Standard shall have a system in place to keep it separate from fish meal and fish oil 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.</p> | <p>FULL COMPLIANCE</p> | <p>Applicant has a policy and system in place to keep labelled MarinTrust product separate from fish meal and fish oil that is produced from non-approved raw material or from a fishery in the MarinTrust Improver Programme have a system in place to keep this separate from both fully approved and non-approved materials.</p> <p>At all stages in the supply chain the Applicant is able to trace RS material back to certified RS factories from where it was derived and is kept separate from any non-compliant RS fishmeal and oil material</p> |
| <p>2.1.4 - All compliant MarinTrust fish meal and fish oil shall be identifiable with a defined positive batch identification system in order to be eligible for identification as compliant with the MarinTrust Standard.</p> | <p>FULL COMPLIANCE</p> | <p>The applicant will demonstrate that all compliant MarinTrust fish meal and fish oil shall be identifiable with a defined positive batch identification system</p> |
| <p>2.1.5 - Where the identity of eligible material is lost, (e.g. through mixing</p> | <p>FULL</p> | <p>The applicant will have a procedure in their management system on how to deal with the case where a loss of traceability or</p> |

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| <p>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.</p> | <p>COMPLIANCE</p> | <p>eligibility of MarinTrust certified material has occurred. This will usually entail the requirement to have an effective quarantine system in place for any product that was found to be outside the scope of this standard or is suspected to be due to a loss of identification and traceability.</p> <p>If this loss of traceability does occur the applicant will have a process and procedure in place to ensure that all this product is NOT labelled MarinTrust compliant</p> |
| <p>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</p> | <p>FULL COMPLIANCE</p> | <p>Links into internal audits. The applicant will need to conduct a mass balance exercise for each raw material type used to ensure that it can be reconciled with the amount of this raw material used and the amount of marine ingredients that it produced.</p> <p>At all stages it will be possible for the applicant to claim that a percentage of the material can be traced back to any certified factories. The material may be mixed with non-compliant material but the supplier can only sell the volume that is certified</p> |
| <p>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 every 12 months for all marine ingredients.</p> | <p>FULL COMPLIANCE</p> | <p>The applicant will have to demonstrate that they completed a full traceability test and MASS BALANCE check on the MarinTrust compliant fish meal and fish oil at least once per year to prove it is still effect and robust and this should be identifiable for each approved raw material. This system test shall cover the entire production process from the source of the raw material to the point where the fish meal and oil is sold to their customer and this shall also include any third party or central distribution depot used by the applicant.</p> <p>All internal audits and test must be conducted by competent individuals that have suitable training to conduct this type of test and check.</p> <p>If they highlight any areas that could pose a potential loss of traceability issue then a plan will be required and implemented which states all the actions required and with suitable time lines to rectify them.</p> <p>If it is a serious breach that could result in mislabelling of MarinTrust compliant fish meal or oil this should be rectified immediately or if this is not possible they should have a process to ensure that the subsequent Fish meal and fish oil must not be labelled as MarinTrust compliant.</p> |
| <p>2.1.7 The internal audit shall include:</p> | | |
| <p>2.1.7.1 - Traceability of fishery material supply– Supplier Traceability.</p> | <p>FULL COMPLIANCE</p> | <p>The auditor shall take a sample of fishmeal and one of oil and shall test the applicant’s traceability system to ensure that it can be traced back to either the source fishery or if a by-product to the source processor.</p> <p>The applicant will be only complaint if this can be done effectively and by using the systems and procedures in place within the plant</p> |
| <p>2.1.7.2 - Traceability of raw fishery</p> | <p>FULL</p> | <p>The auditor should test the process traceability of both fish meal</p> |

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| material to finished product as it moves through processing and all storage stages (including external and third-party storage) - Process Traceability. | COMPLIANCE | and fish oil throughout the entire manufacturing process, including the third-party storage depots and/or central distribution depots, to ensure that all the applicant's systems are effective. The auditor should describe the process and highlight which production date they used to test the traceability systems. Care should be taken to ensure that all external storage facilities are included, if applicable, in this assessment. |
| 2.1.7.3 - Traceability of MarinTrust compliant marine ingredients to immediate customers-Customer Traceability. | FULL COMPLIANCE | The auditor should test the traceability of both fish meal and fish oil throughout the packing and onward selling process to ensure that all the applicant's systems are effective. The auditor should describe this process and highlight which production date they used to test the applicant's traceability systems. Care should be taken to ensure that all external storage facilities are included, if applicable, in this check. |
| 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. | FULL COMPLIANCE | The applicant will have an in Internal audit regime and will specifically look at reviewing their own traceability systems to ensure that they are effective and creditable. The applicant will record all the results from these audits and will document including descriptions of any non-conformances, corrective actions and the date they were corrected and signed off. The auditor will get the last traceability audit and will check that no outstanding actions are waiting close off. The auditor will also check that if non-compliances were noted in the last internal audit that the corrective actions implemented, were robust enough to close out the issue to ensure that it will not occur again in future. |
| 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 | FULL COMPLIANCE | The applicant will have a procedure in their management system on the product recall requirements for MarinTrust certified fish meal and fish oil. In this procedure, there will be a list of contacts that should be inform and one of these will need to be the certification body that award them their MarinTrust certificate. The time frame for informing the certification body shall be stated within this procedure |
| 2.1.9 - Applicants shall perform 1 recall exercise every 12 months and whenever necessary | FULL COMPLIANCE | The facility conducts a re-call exercise every 12 months in order to monitor the efficiency of its re-call system and to assure that non-compliant marine ingredients are being mislabelled as MarinTrust compliant. |
| 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. | FULL COMPLIANCE | The applicant will have a procedure that requires all records to be kept for three years in their management system. The records can either be in a hard or soft format. The auditor should take a sample of records to confirm that this procedure is being adhered to. |
| 2.2.2 - All Records required to verify compliance with the IFFO RS standard shall be accurate, legible and | FULL COMPLIANCE | When Checked the internal audit and mass balance validation are accurate |

unadulterated.

SECTION 3 – RESPONSIBLE MANUFACTURING PRACTICES

3.1 Factories certified to GMP+ or recognised equivalent or to a standard approved as equivalent¹ by the MarinTrust GBC

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| <p>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</p> | <p>FULL COMPLIANCE</p> | <p>The auditor will check the Accreditation Certificate of the Certification Body and ensure that the Certification body is accredited for the given specific scope. If the CB is in application for the appropriate accreditation make notes and comments.</p> |
| <p>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.</p> | <p>FULL COMPLIANCE</p> | <p>The auditor shall check that for all sites assessed, that a full and valid certificate to an approved standard is in place. The auditor will make a note of the certificate number and the certificate validation dates.</p> |
| <p>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.</p> | <p>FULL COMPLIANCE</p> | <p>The auditor will check that all the clauses for the GMP+ standards have been correctly approved, by assessing the applicant's last GMP+ report to ensure that the certification body for this standard has completed a full audit.</p> <p>The auditor will check that all the NCs raised to the GMP+ standard have been closed off and accepted by the GMP+ certification body. As part of the factory assessment the auditor will review where the GMP+ assessment identified a NC to confirm that the corrective actions agreed by the applicant to close this off were still being adhered to.</p> |
| <p>3.1.4 - If applicable, applicants that produce fish oil that is destined for direct human consumption shall have incorporated a specific HACCP study to cover and control all the risks associated with this type of Fish Oil production</p> | <p>FULL COMPLIANCE</p> | <p>Check the applicants HACCP study to ensure that it is specific to the full process and that Fish Oil production is included. If Fish Oil Production is not relevant mark as Not Applicable</p> |
| | <p>CRITICAL NC</p> | <p>NA</p> |
| | <p>MAJOR NC</p> | <p>Fish Oil Production is not included within the Applicants HACCP.</p> |
| | <p>MINOR NC</p> | <p>The HACCP for the Fish Oil Production could be improved.</p> |

3.2 Factories without certification to GMP+ or to an approved equivalent² standard as recognised by the MarinTrust Standard GBC

¹ Programa de Aseguramiento de Calidad (PAC) from Chile.

| 3.2.1 - Structure and Facilities | | |
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| 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 | FULL COMPLIANCE | All facilities and equipment must be constructed of a material that is imperious and readily cleanable. All equipment that comes into direct contact with the raw material and finished fish meal and fish oil must be constructed of an imperious material that will facilitate cleaning. |
| 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. | FULL COMPLIANCE | All facilities and equipment shall need to be designed to ensure that they are cleanable and do not pose a health and safety risk to the staff operating the facility |
| 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 ingredient material | FULL COMPLIANCE | The facility shall have a logical process flow to ensure that there are no cross over points that may allow the semi and finished fish meal and oil to be cross contaminated by the raw intake 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 | FULL COMPLIANCE | The facility shall have a logical process flow to ensure that there are no cross over points that may allow the semi and finished fish meal and oil to be cross contaminated by the raw intake material. The facility must have strict movement requirements of personal to ensure that they do not cross contaminate the semi and finished fish meal and fish oil with the raw material |
| *3.2.1.4 - There shall be adequate lighting to ensure activities can be undertaken safely and efficiently. <i>Note: If the applicant holds a Chilean PAC certification, this clause shall be audited.</i> | FULL COMPLIANCE | The lighting in all parts of the facility must be sufficient to allow for good cleaning and operational practices and possible pest detection |
| 3.2.1.5 - Protective clothing shall be worn where the applicant has determined that there is a risk from personnel to marine ingredient contamination | FULL COMPLIANCE | All personnel shall be issued with appropriate protective clothing. Protective clothing subject to a risk assessment. |
| *3.2.1.5.1 - Protective clothing shall be | FULL | At all parts within the fish meal plant protective overalls, safety glasses, safety boots and head gear shall be worn. Ear defenders |

² Factories with a valid PAC standard as audited in section 3.1 shall also be audited to some clauses in this section. The relevant clauses are marked with an asterisk.

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| worn where the applicant has determined that there is a risk to personnel health and safety <i>Note: If the applicant holds a Chilean PAC certification, this clause shall be audited.</i> | COMPLIANCE | are required in areas of the plant where there is excessive noise. |
| 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. | FULL COMPLIANCE | The facility shall have a designated cleaning schedules and processes in place to ensure that all these areas are cleaned on a regular basis. The raw fish silos shall as a minimum be cleaned on a weekly basis. The delivery vehicles and skips shall as a minimum be cleaned after their contents have been unloaded into the facility. This shall be documented |
| 3.2.2.2 - There shall be adequate facilities to receive, off-load and store fishery raw material from vessels and overland transportation before | FULL COMPLIANCE | The facility shall have enough capacity to ensure that the raw material is suitably stored prior to it being processed. If it cannot be placed into a storage silo due to excessive capacity it shall be stored in a suitable refrigerated trailer or storage facility until it can be moved to the intake silo or pit |
| 3.2.2.3 - Intake facilities shall be designed to ensure that access by birds and other ground pests is eradicated. | FULL COMPLIANCE | The facility shall ensure that all reception areas are fully protected from pest activity by the installation of bird mesh screens and all these areas must be kept clean and be in good structural condition to allow for the early detection of any other pest activity |
| 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. | FULL COMPLIANCE | Review staff training records to ensure they understand what actions they should be doing and to prove competence |
| 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. | FULL COMPLIANCE | The facility must have documented assurance that the three previous loads will not adversely affect the safety or quality of the fish meal and fish oil |
| 3.2.3 - Maintenance and Contractors | | |
| 3.2.3.1 - There shall be a preventative maintenance programme in place for the facility. | FULL COMPLIANCE | The facility must have a comprehensive maintenance programme in place that is designed to be proactive rather than reactive. E.G there should be processes in place that will strip down and check the repair of all parts of the facility on an annual basis to ensure that its functions correctly and is still in a good state of repair |
| 3.2.3.2 - All lubricants and oils shall be | FULL | All these chemicals should be stored in a designated area away |

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| stored in a designated non-production or nonproduct storage area to prevent a risk of contamination of marine ingredients materials | COMPLIANCE | from the production or storage facilitates of fish meal and fish oil. Once used in the production area they should be placed in a sealed contained in designated areas that will not pose a contamination risk to the fish meal or fish oil production |
| 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. | FULL COMPLIANCE | The facility must have process to manage all subcontractors which will involve some form of risk assessment to ensure that their activities do not pose a contamination risk to the fish meal and fish oil production. E.g. fire, working at height risk assessment if applicable should be conducted at the part of the factory where they contractors will be operating |
| 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 | FULL COMPLIANCE | The key areas to be reviewed will be those areas that have direct contact with the raw material, the semi processed fish meal and oil and the finished product. Due to the nature of fish meal production some exterior metal may show signs of corrosion which will be acceptable as long as it does not contaminant the raw, semi-finished or finished material |
| 3.2.4.2 - Water used in or associated with the process shall be of potable quality | FULL COMPLIANCE | The facility will need to provide diagnostic evidence that the water used in this operation is classified as potable and fit for human consumption. Some facilities use OSMOSIS and Chlorination systems to achieved the desired results which will be acceptable |
| 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 | FULL COMPLIANCE | A full set of process and procedures will need to be maintained by the facility to ensure that these requirements are to be adhered to |
| *3.2.4.4 - Checks on dosing rates, calibration and control shall be recorded and maintained <i>Note: If the applicant holds a Chilean PAC certification, this clause shall be audited.</i> | FULL COMPLIANCE | A record of these checks will be required as evidence |
| 3.2.4.5 - All additives to water shall be authorised and shall not pose a risk to marine ingredient safety by their application. | FULL COMPLIANCE | This will need to be a documented record from the national authority that has the jurisdiction of this facility |
| 3.2.4.6 - Fixtures in process and | FULL | The glass can be shatterproof in construction or it is covered with a |

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| storage areas that contain glass shall be protected to minimise the risk of contamination in the event of breakage | COMPLIANCE | protective plastic film or cover. Evidence of a glass register |
| <p>*3.2.4.7 - Where mechanical drying of marine ingredient is undertaken; documented procedures shall ensure that it does not cause adverse effects on the marine ingredient safety</p> <p><i>Note: If the applicant holds a Chilean PAC certification, this clause shall be audited.</i></p> | FULL COMPLIANCE | A documented process and procedure will be required to ensure that all the fish meal is dried in a consistent manner, this will need to be backed up by diagnostic records to prove it is accurate. A 3-drying stage process is required to reduce the moisture content out of the fish meal in a phased manner to ensure fishmeal safety. |
| <p>*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.</p> <p><i>Note: If the applicant holds a Chilean PAC certification, this clause shall be audited.</i></p> | FULL COMPLIANCE | A full risk assessment of such risks should be conducted and systems be put in place to mitigate any identified risk. A further control measure to deduce the effectiveness of these mitigation systems will be to conduct a series of environmental tests to clarify if there is any pathogenic risk within the operation |
| 3.2.4.9 - Procedures shall include corrective actions to be taken in the event of critical process parameters being breached. | FULL COMPLIANCE | A full quarantine and rework process and procedures must be in place if results of the diagnosis test show that these critical process parameters have been breached. Full documented records will need to be maintained where breaches have occurred to prove that no fish meal or oil left the plant which was outside of these critical process parameters |
| 3.2.4.10 - The production process shall have systems in place to reduce the risk of physical contamination from potential physical contaminants such as metal | FULL COMPLIANCE | The fish meal plan shall have in place system to remove physical contaminates e.g. for metal some magnetic systems need to be adopted in the finished fish meal production line prior to final bagging or storage. For other forms of physical contaminates e.g. bones etc. a filtering system should be incorporated |
| 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 | FULL COMPLIANCE | A full set of processes and procedures must be in place for all parts of the facility to ensure that the cleaning is effective |
| 3.2.5.2 - Cleaning and disinfectant products shall not pose a risk to marine ingredient material | FULL COMPLIANCE | The facility must have conducted some form of risk assessment to ensure that the cleaning processes do not pose a safety risk to the product Staff must be trained to ensure that understand how to use the |

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| contamination through their proper dilution, application, and the use of secure storage | | chemicals safely |
| 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 | FULL COMPLIANCE | The facility must have conducted some form of risk assessment to ensure that the cleaning processes do not pose a safety risk the staff conducting this operation. Staff must be trained to ensure that understand how to use the chemicals safely |
| 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). | FULL COMPLIANCE | A full set of records must be present to show that the cleaning processors are conducted for all major items of equipment to be in alignment with the facility's cleaning procedures |
| 3.2.5.5 - Accurate records of cleaning activity and checks on efficacy shall be maintained. | FULL COMPLIANCE | The records must be checked to ensure that they have been completed accurately and in alignment with the facility's cleaning procedures. All records for MarinTrust must be kept for a minimum period of 3 years |
| 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. | FULL COMPLIANCE | A documented policy on how to deter and control pest activity must be in place |
| 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. | FULL COMPLIANCE | The pest control company must be licenced as being competent by the national authority that has jurisdiction over this factory If conducted in house by the facility the personnel in charge of pest control must have attended and passed a professional qualification on how to control pest activity |
| 3.2.6.3 - Detailed records of the location of bait stations, poisons, pest control inspections, recommendations and necessary action undertaken shall be retained. | FULL COMPLIANCE | A site plan with all the bait stations and other pest control devices must be available and date record sheets to show what poisons are used and processes on how these chemicals should be stored, used and handled must be available. All records for MarinTrust must be kept for a minimum period of 3 years |
| 3.2.7 - Waste Management | | |
| 3.2.7.1 - All waste materials shall be | FULL | The containers used for waste must be in a structural good |

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| stored in dedicated containers, held in separate areas so as to prevent contamination of marine ingredients materials or pest infestation. | COMPLIANCE | condition and fitted with tightly fitting lids to aid cleaning and to deter pest activity. The waste storage containers must not be stored with the fish meal but should be placed in a designated area well away from fish meal and oil production. All waste must be removed by a company that is licenced by the regulatory authority that has jurisdiction over the facility |
| 3.2.7.2 - There shall be adequate internal drainage to maintain a clean work area and minimise health and safety risks | FULL COMPLIANCE | In the waste storage area, there must be adequate drainage to remove any risk of slippages and to enable the area to be cleaned correctly |
| 3.2.7.3 - Facility sewerage shall be contained by a separate closed system to that of the processing drainage system. | FULL COMPLIANCE | The sewage system must not be connected directly to the drainage system used within the processing areas of the facility. This sewage system must be checked by the facility to ensure that this complete separation is maintained |
| 3.2.8 - Packaging and Labelling | | |
| 3.2.8.1 - Packaging shall be designed to protect fishmeal during normal storage, handling and delivery conditions | FULL COMPLIANCE | The packaging material used must impart any potential contamination to the marine ingredients and must be able to protect the product from external contamination sources |
| *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 <i>Note: If the applicant holds a Chilean PAC certification, this clause shall be audited.</i> | FULL COMPLIANCE | The name of the production site The company name The nett weight The product name The product characteristics (min Protein content, max fat, ash, moisture) |
| 3.2.9 - Storage Facilities | | |
| 3.2.9.1 - Fishmeal stores shall be designed, constructed, and managed to prevent product contamination | FULL COMPLIANCE | The store should be constructed to facilitate cleaning and be protected from potential pest activity |
| 3.2.9.2 - Storage facilities shall be dry, adequately ventilated to prevent condensation and reduce the risk of | FULL COMPLIANCE | The store should be equipped with either passive or mechanical ventilation and the products should be stored in a manner to facilitate good air circulation, i.e. Be placed off the floor away from the walls |

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| <p>dirt and dust contamination</p> | | <p>and have sufficient spaces between batches of product</p> |
| <p>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.</p> | <p>FULL COMPLIANCE</p> | <p>The facility must provide evidence that these vehicles are only ever used for this function, and they are part of the cleaning regime.</p> |
| <p>*3.2.9.4 - Environmental analysis for salmonella sp. shall be carried out in fishmeal storage areas according to the HACCP based risk assessment.</p> <p><i>Note: If the applicant holds a Chilean PAC certification, this clause shall be audited.</i></p> | <p>FULL COMPLIANCE</p> | <p>Document records of these checks must be available and must be kept for a period of at least 3 years</p> |
| <p>3.2.10 - Loading and Transport</p> | | |
| <p>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.</p> | <p>FULL COMPLIANCE</p> | <p>All facilities must be constructed of a material that is imperious and readily cleanable. All equipment that comes into direct contact with the raw material and finished fish meal and fish oil must be constructed of an imperious material that will facilitate cleaning.</p> <p>A facilities and equipment shall need to be designed to ensure that they are cleanable and do not pose a health and safety risk to the staff operating within the facility</p> <p>Cleaning records must be maintained and these should be kept for a minimum of 3 years</p> |
| <p>*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.</p> <p><i>Note: If the applicant holds a Chilean PAC certification, this clause shall be audited.</i></p> | <p>FULL COMPLIANCE</p> | <p>The facility must have conducted some form of risk assessment to ensure that the transport processes do not pose a safety risk to the product or the staff conducting this operation</p> <p>A further control measure to deduce the effectiveness of these mitigation systems will be to conduct a series of environmental tests to clarify if there is any pathogenic risk within the operation</p> |
| <p>*3.2.10.2.1 - The results of these mitigating activities shall be recorded</p> <p><i>Note: If the applicant holds a Chilean PAC certification, this clause shall be</i></p> | <p>FULL COMPLIANCE</p> | <p>Evidence of mitigation activities</p> <p><i>Note: If the applicant holds a Chilean PAC certification, this clause shall be audited.</i></p> |

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| <i>audited.</i> | | |
| <p>*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.</p> <p><i>Note: If the applicant holds a Chilean PAC certification, this clause shall be audited.</i></p> | FULL COMPLIANCE | All facilities must be constructed of a material that is imperious and readily cleanable. All equipment that comes into direct contact with the finished fish meal and fish oil must be constructed of an imperious material that will facilitate cleaning. A facilities and equipment shall need to be designed to ensure that they are cleanable and do not pose a health and safety risk to the staff operating the facility |
| 3.2.10.4 - Loading shall not be carried out in conditions which will adversely affect the raw materials or marine ingredient materials being handled (e.g. inclement weather conditions). | FULL COMPLIANCE | The facility should conduct an assessment of the loading conditions e.g. the weather and put in place additional measures prior to the loading of bulk fish meal or unloading of raw material. The auditor will make a physical review of the loading operations to ensure that inclement weather conditions cannot contaminate the finished product |
| 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 marine ingredient materials due to the composition of a previous cargo. | FULL COMPLIANCE | The facility must have documented assurance that the three previous loads will not adversely affect the safety or quality of the fish meal and fish oil |
| 3.2.11 Hazard Analysis Critical Control Point (HACCP) Systems | | |
| Note: This risk management tool is primarily used to manage food safety risks. A HACCP system allows you to identify hazards and put in place controls to manage these throughout your supply chain during production. The HACCP scheme meets the requirements of the Codex Alimentarius Commission (CAC) – established by the World Health Organisation and the Food and Agriculture Organisation of the United Nations to bring together international food standards, guidelines and codes of practice to ensure fair trade. | | |
| 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 marine ingredient production. | FULL COMPLIANCE | Conduct a review of the facility processes and ensure that the most current HACCP study reflect the current operation |
| 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 ingredient | FULL COMPLIANCE | Procedures must comply with the most current HACCP study |

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| specifications, etc., commonly referred to as prerequisites shall be in place prior to the establishment of the HACCP plan. | | |
| <p>3.2.11.3 - The HACCP study 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:</p> <ul style="list-style-type: none"> • 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. | FULL COMPLIANCE | The Risk Assessment must be in comply with the most recent HACCP study and be a true reflection of what is happening within the facility. Attention must be taken to review if any part of the facility has been amended and if these changes have been addressed in the HACCP study |
| <p>3.2.11.4 - If applicable, applicants that produce fish oil that is destined for direct human consumption shall have incorporated a specific HACCP study to cover and control all the risks associated with this type of Fish Oil production</p> | FULL COMPLIANCE | Additional controls will be required for Human consumption Fish oil compared to those required just for non-human consumption oil |
| 3.2.12 - HACCP Principles | | |
| <p>3.2.12.1 - Conduct a hazard analysis assessment on the Operation</p> | FULL COMPLIANCE | Prior to any new production line being added |
| <p>3.2.12.2 - Determine the Critical Control Points (CCP's) in the system.</p> | FULL COMPLIANCE | Need a full CCP decision tree to be documented |
| <p>3.2.12.3 - Establish Critical Limits for the critical control points identified</p> | FULL COMPLIANCE | Need to document how these were established |
| <p>3.2.12.4 - Establish a system to monitor control of the CCPs</p> | FULL COMPLIANCE | Need to document how these will be monitored and who is responsible |

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| <p>3.2.12.5 - Establish the corrective actions to be taken when monitoring indicates that a particular CCP is not under control</p> | <p>FULL COMPLIANCE</p> | <p>Needs to be documented</p> |
| <p>3.2.12.6 - Establish procedures of validation to confirm that the HACCP System is working effectively.</p> | <p>FULL COMPLIANCE</p> | <p>Needs to be documented and reviewed annually or after an incident or when facility changes occur</p> |
| <p>3.2.12.7 - Establish documentation concerning all procedures and records appropriate to these principles and their application.</p> | <p>FULL COMPLIANCE</p> | <p>Need to maintain for a period of at least 3 years</p> |
| <p>3.2.12.8 - In formulating the HACCP Plan, reference shall be made to relevant legislation or guidelines.</p> | <p>FULL COMPLIANCE</p> | <p>Need to reference which national legislation was reviewed and how does this related to international standards</p> |
| <p>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.</p> | <p>FULL COMPLIANCE</p> | <p>Need to have signed document by a senior manager or director to prove that the culture within the facility are adopting the requirements of this HACCP study</p> |
| <p>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</p> | <p>FULL COMPLIANCE</p> | <p>Needs to have completed some formal training into the principles of HACCP and how the system should be managed and monitors</p> |
| <p>3.2.12.11 - Key personnel identified as HACCP team members shall have appropriate training, product and process knowledge and experience.</p> | <p>FULL COMPLIANCE</p> | <p>Need to describe how and why members of the HACCP team were chosen and do they represent each affected part of the facility</p> |
| <p>3.2.12.12 - All existing and new products shall be covered by the HACCP System, which shall be appropriately reviewed.</p> | <p>FULL COMPLIANCE</p> | <p>Need to conduct a physical check and especially important if new facilities or processes have been added</p> |
| <p>3.2.12.13 - Through the HACCP System, the Company shall be able to demonstrate effective control of all operations critical to food safety</p> | <p>FULL COMPLIANCE</p> | <p>Need to have documented monitoring processes and procedures with records to prove compliance</p> |
| <p>3.2.12.14 - The HACCP Team shall</p> | <p>FULL</p> | <p>Documented records of these reviews must be maintained</p> |

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| 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 ingredient materials. | COMPLIANCE | |
| 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. | FULL COMPLIANCE | This should be part of the internal audit regime within the facility |
| 3.2.14 - HACCP Documentation and Records | | |
| Controlled documentation shall be established which adequately describes the system and records all monitoring activities essential to the implementation and operation of HACCP. The documentation should include: | | A procedure must be in place on how the facility will ensure that only the most up to date procedures documents are used within the factory |
| 3.2.14.1 - Data used in the hazard analysis. | FULL COMPLIANCE | Records maintained for a minimum period of 3 years |
| 3.2.14.2 - Specification of product and materials used. | FULL COMPLIANCE | Records maintained for a minimum period of 3 years |
| 3.2.14.3 - Monitoring procedures for CCP's. | FULL COMPLIANCE | Records maintained for a minimum period of 3 years |
| 3.2.14.4 - CCP monitoring records physically or electronically signed and dated by responsible person. | FULL COMPLIANCE | Records maintained for a minimum period of 3 years |
| 3.2.14.5 - Results of Internal (and external) Audit reports, non-conformances and corrective actions and minutes produced at meetings | FULL COMPLIANCE | Records maintained for a minimum period of 3 years |
| 3.2.14.6 - A record shall be kept of HACCP reviews showing the HACCP | FULL | Records maintained for a minimum period of 3 years |

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| Team findings and any actions implemented. | COMPLIANCE | |
| 3.2.14.7 - A document control procedure shall be in place for all HACCP documentation | FULL COMPLIANCE | Records maintained for a minimum period of 3 years |
| 3.2.15 – Marine Ingredients Specifications | | |
| <p>*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 ingredient materials offered by the participant.</p> <p><i>Note: If the applicant holds a Chilean PAC certification, this clause shall be audited.</i></p> | FULL COMPLIANCE | Records maintained for a minimum period of 3 years |
| 3.2.15.2 - The Specification shall confirm whether the marine ingredient is a compliant MarinTrust material | FULL COMPLIANCE | Records maintained for a minimum period of 3 years |
| 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 | FULL COMPLIANCE | Records maintained for a minimum period of 3 years |
| <p>*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.</p> <p><i>Note: If the applicant holds a Chilean PAC certification, this clause shall be audited.</i></p> | FULL COMPLIANCE | Records maintained for a minimum period of 3 years |
| *3.2.16.3 - Samples of the finished materials shall be labelled to facilitate traceability and retained in appropriate conditions for a minimum | FULL COMPLIANCE | Records maintained for a minimum period of 3 years |

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| <p>period of six months.</p> <p>Note: <i>If the applicant holds a Chilean PAC certification, this clause shall be audited.</i></p> | | |
| <p>*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 antioxidants.</p> <p>Note: <i>If the applicant holds a Chilean PAC certification, this clause shall be audited.</i></p> | FULL COMPLIANCE | Records maintained for a minimum period of 3 years |
| <p>3.2.16.5 - The sample and testing plan shall be based on a HACCP based risk assessment for undesirable substances.</p> | FULL COMPLIANCE | Records maintained for a minimum period of 3 years |
| <p>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.</p> | FULL COMPLIANCE | A documented procedure will be required to prove that this meets with the national authority requirements that has jurisdiction over this facility |
| <p>3.2.16.7 - Records shall be available to document the final disposition of any non-conforming material.</p> | FULL COMPLIANCE | Records maintained for a minimum period of 3 years |
| <p>3.2.16.8 - Testing laboratories shall be approved by one or more of the following methods:</p> | FULL COMPLIANCE | Records maintained for a minimum period of 3 years |
| <p>i) Accreditation by a nationally recognised accreditation authority according to EN/ISO-17025 for the test under consideration;</p> | FULL COMPLIANCE | The applicant can provide an authentic and up-to-date accreditation certificate for the test laboratory |
| <p>ii) Validation by taking part in relevant ring tests</p> | FULL COMPLIANCE | Evidence that the testing lab is involved in a ring testing program |
| <p>3.2.17 - Calibration of Measuring Equipment</p> | | |

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| <p>3.2.17.1 - All inspection, measuring and test equipment used to confirm that raw, in process and finished marine ingredients meet specified marine ingredient safety requirements shall be calibrated at intervals not exceeding 12 months.</p> | <p>FULL COMPLIANCE</p> | <p>Records maintained for a minimum period of 3 years</p> |
| <p>3.2.17.2 - Records of calibration shall be maintained.</p> | <p>FULL COMPLIANCE</p> | <p>Records maintained for a minimum period of 3 years</p> |
| <p>3.2.18 - Assessment of Suppliers</p> | | |
| <p>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.</p> | <p>FULL COMPLIANCE</p> | <p>Records maintained for a minimum period of 3 years</p> |
| <p>SECTION 4 – FISH BY – PRODUCTS</p> | | |
| <p>4.1 Raw Fishery Materials from Fish By products produced during Processing</p> | | |
| <p>Raw material originating from fish processing operations may only be used to produce fishmeal or fish oil if it meets the following criteria:</p> | | |
| <p>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.</p> | <p>FULL COMPLIANCE</p> | <p>The applicant will need to provide assurance that all the by-product trimmings utilised in the plant and are destined to make compliant MarinTrust material have come directly from factories where the fish has been used for direct HUMAN consumption. The applicant must have a policy statement committing them to the requirements of this clause. The applicant must also have a signed commitment from the fish processors that they will only send fish trimmings to the applicant from processing operations that were destined for Human consumption.</p> <p>The applicant can utilise whole fish that was destined for human consumption as long as they can prove that it was not captured directly for fish meal production and that the only reason it is in the fish meal plant is that it was rejected on quality grounds by the human consumption factory. The proof will need to be in the form of written evidence that the human consumption factory rejected the consignment of whole fish on the ground of poor quality.</p> <p>The applicant will have a policy that it will not utilise fish by products from fish species that are critically endangered or endangered as classified by the IUCN red list. This commitment must be agreed to by the supplying processors in the form of a signed agreement not to send this classification of fish by product, in the waste material sent to the applicant. The majority up to 90% by volume of all by product fisheries utilise will be</p> |

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| | | <p>tested by the standard's certification body to ensure that they are not classified as critically endangered or endangered, before they will be approved for use as a MarinTrust by product. The remainder are very small volumes of fish species and the applicant will rely on the processor's commitment not to place trimmings from endangered species into the applicant's factory.</p> <p>The applicant will have a robust traceability system in place to provide proof that all fish by products can be traced back to the supplying fish processing plants.</p> |
| <p>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.</p> | <p>FULL COMPLIANCE</p> | <p>This information is collected at the fishery stage</p> |
| <p>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.</p> | <p>FULL COMPLIANCE</p> | <p>This information is collected at the fishery stage</p> |
| <p>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.</p> | <p>FULL COMPLIANCE</p> | <p>This information is collected at the fishery stage</p> |
| <p>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 IFFO RS GB and in compliance with clause 3.2.2.5, which include: no contamination with Land Animal Protein (LAP), chemical, biological or physical agents</p> | <p>FULL COMPLIANCE</p> | <p>The applicant will have a policy to check that up to 3 previous loads are recorded on the delivery note for all the by-products. This is to ensure that the transportation trailer used to deliver the fish by products has not been used to transport products that may contaminate the fish e.g. Land Animal based Proteins (LAP), Glass, chemicals etc. This requirement will not be necessary if the applicant can provide evidence that the bulker trailer is dedicated for fish by products transportation only.</p> <p>The factory if it utilises a skip or boxes to transport the fish by-products, should ensure that they are equipped with covers, and are maintained in a clean condition to prevent contamination and must ensure that they are only used to move fish based goods. If not the skips and boxes should be thoroughly cleaned prior to use.</p> |

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| | | <p>Documented evidence that this process has been conducted effectively shall be available for assessment.</p> <p>The applicant will in this policy state that only Category 3 waste material will be used in this factory for the production of IFFO RS fish meal and fish oil.</p> |
| <p>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.</p> | <p>FULL COMPLIANCE</p> | <p>The applicant on application to the MarinTrust standard will provide a list of the species that make up at least 90% of the trimmings that it uses and these will undergo a by-product assessment by the standard's certification body to ensure that there is not a risk of IUU fish being used. The applicant shall have written confirmation from its supplying processors that they will not place fish in the waste that they know is from IUU fisheries.</p> <p>The other 10% of by-products will not normally be assessed as their volumes will be low by species, but the applicant should be informed from the processors what they are, so as to ensure that they not from IUU fisheries or are landed by black listed fishing boats.</p> |
| <p>Records of the above shall be maintained.</p> | | |
| <p>4.2 Raw Fishery Material from Aquaculture</p> | | |
| <p>Raw material originating from aquaculture production may only be used to produce fishmeal or fish oil if it meets the following criteria:</p> | | |
| <p>4.2.1 - They shall show no clinical signs of disease on the day of receipt (EU Reg 1774/2002).</p> | <p>FULL COMPLIANCE</p> | <p>The applicant will have a policy on what type of waste material can be sourced from aquaculture and they must have a policy in place to not accept diseased fish waste.</p> <p>The applicant must also train their staff to understand what to look for if diseased fish come to the factory</p> |
| <p>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.</p> | <p>FULL COMPLIANCE</p> | <p>The applicant will have a policy on what type of waste material can be sourced from aquaculture and they must have a policy in place not to accepted prohibition fish waste. However, fish that is from surrounding farms that has been slaughtered as a precautionary action can be used as a raw material for MarinTrust fish meal and fish oil production, as long as there is documented proof that this material is not infected e.g. by Veterinary certificate or declaration that it can be used in fish meal and fish oil production</p> |
| <p>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)</p> | <p>FULL COMPLIANCE</p> | <p>The applicant will have a policy and procedure to keep the different types of by product separate, so that farmed salmon trimmings and other aquaculture by-products etc. cannot be made into fish meal or oil that can be used in the production of fish diets for the same species. The applicant will need to have the capability of keeping this aquaculture derived fish meal and oil separate from the fish meal and oil made from wild capture species.</p> <p>This can be done by time so the salmon or other aquaculture waste is done first followed by a cross over period and all this resultant fish meal and oil while it can be MarinTrust, cannot be used as fish feed and as such will need to be labelled appropriately.</p> |

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| | | Alternatively the factory can have dedicated lines to handle aquaculture derived waste and wild capture derived waste material. The applicant will need a clear traceability system for both types and this will need to be tested by the auditor to prove that it is in compliant with this requirement. |
| SECTION 5 – SOCIAL ACCOUNTABILITY | | |
| <p>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</p> | FULL COMPLIANCE | <p>Note- Review a copy of the regulatory authority requirements that cover the jurisdiction of this facility if this covers are the requirements of this section then mark as compliant and there is no need to rate each individual clause within this section</p> <p>If there is no legal requirement the facility will need to have its own code of practice in place that covers are the clauses within this section as a minimum requirement</p> <p>If the Facility has an SA 8000 or Naturland or an equivalent standard that incorporates a level of social auditing certificate this will cover most of the requirements of this section</p> |
| <p>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.</p> | FULL COMPLIANCE | <p>This should ideally be displayed in a prominent location so that staff are aware of this company policy – e.g. canteen, reception</p> |
| <p>5.3 - The applicant shall ensure that all staff have the correct visa/work permit to comply with their current national employment regulations</p> | FULL COMPLIANCE | <p>There should be accurate and up to date records for all staff. All staff should have the correct visa/work permit to comply with their current national employment regulations. Records contain at least full names, nationality, job description, date of birth, the regular working time, wage and the period of employment</p> |
| <p>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.</p> | FULL COMPLIANCE | <p>The applicant can provide evidence that its social accountability commitment policy is reviewed every year to take into account any changes in national legislation or international codes of best practice.</p> <p>The applicant shall also have a staff communication process in place to ensure that all staff including new and sub-contracted staff are fully aware of their rights in connection with this social accountability policy.</p> <p>The applicant shall also incorporate a system for staff to be able to communicate to the senior management, in confidence, any issues that an employee may have with the applicant’s compliance to this policy.</p> |

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| | | <p>The applicant will have an open and transparent process to share with all staff changes that it wishes to incorporate following complaints, grievances, or noncompliance's raised during the annual review.</p> <p>The auditor shall have clear documented evidence to ensure that these requirements are fully complied with by the applicant</p> |
| <p>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.</p> | <p>FULL COMPLIANCE</p> | <p>As minimum requirement an accident recording book will be required. The applicant has 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 covers the process to record the incident in a database and to take corrective action.</p> |
| <p>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.</p> | <p>FULL COMPLIANCE</p> | <p>All records must be kept for a minimum time period of 3 years</p> <p>How this representative was elected shall need to be recorded</p> |
| <p>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.</p> <p>5.7.1 - The complaint procedure shall specify a time frame to resolve complaints.</p> <p>5.7.2 - Complaints and their solutions from the last 3 years are documented and accessible.</p> | <p>FULL COMPLIANCE</p> | <p>All records must be kept for a minimum time period of 3 years</p> |
| <p>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</p> | <p>FULL COMPLIANCE</p> | <p>Posters, meetings records/minutes to inform staff would be suitable evidence</p> |

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| <p>of all employees.</p> <p>5.8.1 - The employees have been informed about the self-declaration and it is reviewed at least every 12 months and whenever necessary.</p> <p>Note- This declaration contains at least commitment to the ILO core labour conventions (ILO Conventions 111 on discrimination, 138 and 182 on minimum age and child labour, 29 and 105 on forced labour, 87 on freedom of association, 98 on the right to organize an collective bargaining, 100 on equal remuneration and 99 on minimum wage) and transparent and non-discriminative hiring procedures and the complaint procedure.</p> | | |
| <p>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.</p> | <p>FULL COMPLIANCE</p> | <p>This will need to back up with any training that this responsible person received</p> |
| <p>5.10 - The applicant shall have a contract for each employee containing the following.</p> <p>Note- can be shown to the assessor on request on a sample basis.</p> | <p>FULL COMPLIANCE</p> | <p>All records must be kept for a minimum time period of 3 years</p> |
| <p>5.10.1 - Both the employees as well as the employer have signed contracts.</p> | <p>FULL COMPLIANCE</p> | <p>Signed contracts available for all employees</p> |
| <p>5.10.2 - Records contain at least full names, nationality, job description, date of birth, the regular working time,</p> | <p>FULL COMPLIANCE</p> | <p>Records with all appropriate details are available</p> |

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| wage and the period of employment | | |
| 5.10.3 - Records of all employees (also subcontractors) shall be accessible for at least 3 years. | FULL COMPLIANCE | All records must be kept for a minimum time period of 3 years |
| 5.11 - The applicant can show adequate documentation of the salary transfer (e.g. employee's signature on pay slip, bank transfer). | FULL COMPLIANCE | All records must be kept for a minimum time period of 3 years |
| 5.11.1 - Employees sign or receive copies of pay slips / pay register that make the payment transparent and comprehensible for them. | FULL COMPLIANCE | Records with all appropriate details are available |
| 5.11.2 - Regular payment of all employees during the last 3 years is documented. | FULL COMPLIANCE | Records with all appropriate details are available |
| 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). | FULL COMPLIANCE | Records with all appropriate details are available. All records must be kept for a minimum time period of 3 years |
| 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. | FULL COMPLIANCE | Records with all appropriate details are available |
| 5.13 - The applicant can show records indicating compliance with national legislation regarding minimum age of employment. | FULL COMPLIANCE | Records with all appropriate details are available. All records must be kept for a minimum time period of 3 years |
| 5.13.1 - If not covered by national legislation, children below the age of 15 are not employed. | FULL COMPLIANCE | Records with all appropriate details are available. No evidence of child labour |
| 5.13.2 - If personnel between the ages of 15 to 18 are hired part time, they | FULL | Records with all appropriate details are available |

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| <p>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.</p> | <p>COMPLIANCE</p> | |
| <p>5.14 - The applicant shall document that they have communicated with their raw material suppliers the national social regulation requirements.</p> | <p>FULL COMPLIANCE</p> | <p>Records with all appropriate details are available</p> |
| <p>SECTION 6 – ENVIRONMENTAL ACCOUNTABILITY</p> | | |
| <p>6.1 - 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 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</p> | <p>FULL COMPLIANCE</p> | <p>Note- Review a copy of the regulatory authority requirements that cover the jurisdiction of this facility if this covers are the requirements of this section then mark as compliant and there is no need to rate each individual clause within this section</p> <p>If there is no legal requirement the facility will need to have its own code of practice in place that covers are the clauses within this section as a minimum requirement</p> <p>If the factory has an ISO 14000 certificate this should cover all the requirements within this section</p> |
| <p>6.2 - The applicant shall provide copy of permits (when applicable) for environmental emissions regulations as the legislation relates to:</p> <ul style="list-style-type: none"> • Emissions to air • Discharge to water • Release of toxic or hazardous substances • Noise, smell and dust pollution • Ground pollution | <p>FULL COMPLIANCE</p> | <p>Records with all appropriate details are available All records must be kept for a minimum time period of 3 years</p> |
| <p>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</p> | <p>FULL COMPLIANCE</p> | <p>Records with all appropriate details are available. All records must be kept for a minimum time period of 3 years</p> |

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| 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. | FULL COMPLIANCE | Records with all appropriate details are available. Evidence required will be the latest environmental risk assessments |
| 6.4.1 - Management is able to demonstrate awareness of the identified issues and the provisions made to address the associated risks. | FULL COMPLIANCE | Records with all appropriate details are available |
| SECTION 7 – COMMUNITY ENGAGEMENT | | |
| 7.1 - The applicant shall have a written evaluation of the potential impacts of direct operations on the local community. | FULL COMPLIANCE | Need evidence of local community engagement- records of any meetings held |
| 7.1.1 - There shall be documentation showing the measures taken to avoid, mitigate and/or compensate for negative impacts on the local community. | FULL COMPLIANCE | Records with all appropriate details are available |
| 7.2 - There shall be documentation showing the involvement in regular engagement with local community representatives and organizations. | FULL COMPLIANCE | Records with all appropriate details are available |
| 7.3 - There shall be records of community complaints and the associated corrective action taken to address their concerns. | FULL COMPLIANCE | Records with all appropriate details are available All records must be kept for a minimum time period of 3 years |

Review of the Applicant Intake Operations for Recording of Fishery Landings and Transfers.

The following items were raised through the Desk Top Study for further clarification at the On-site Audit:

Auditor note: Where possible, please provide any observations or comments in relation to the clarifications required below:

| No | Clarification Required | Comments |
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Vessel Inspection/Catch Inspection

The following items were raised through the Desk Top Study for further clarification at the On-site Audit:

Auditor Note: If there is no opportunity to view vessels and catch landed please insert N/A in the comment sections below.

| No | Clarification Required | Comments |
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By Product Surveillance Inspection

The following items were raised through the Desk Top Study for further clarification at the On-site Audit:

Auditor Note: If there is no opportunity to view vessels and catch landed please insert N/A in the comment sections below.

| No | Clarification Required | Comments |
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