

# Responsible Supply of Marine Ingredients

# Chain of Custody Standard Version 2

A Tool for Voluntary Use in Markets for

**Products of Marine Ingredients** 

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#### **MarinTrust Programme**

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### **Foreword**

MarinTrust is the leading independent business to business certification **programme for the marine ingredients value chain.** 

Responsible sourcing and manufacturing is vital if marine ingredients are to remain a relevant ingredient in feed for culture, agriculture, pet care and directly in the production of consumer products, including cosmetics and nutraceuticals. Fishmeal and fish oil make up the largest share of marine ingredients today, however all marine ingredients (see definition in the definitions section below) are included in MarinTrust's scope.

In order to enable stakeholders to credibly demonstrate the commitment to responsible practice in areas of feed safety, raw material procurement, delivery, and throughout the production process, MarinTrust developed a robust Certification Programme1, consisting of three main components:

- The MarinTrust Standard: The verification and certification of marine ingredients factories that source their raw material from approved fisheries and by-product fisheries,
- The MarinTrust Chain of Custody (CoC) Standard: The verification and certification of the chain of custody for marine ingredients (products) that come from MarinTrust certified factories along the value chain to the customer.
- The Improver Programme: The verification and approval of marine ingredients factories that source their raw material from accepted MarinTrust Improver fisheries.

Standards under the MarinTrust Programme are developed in accordance with the ISEAL Standard Setting Code and following ISO guidance. The programme is managed by the MarinTrust Secretariat under the MarinTrust governance led by its Governance Body Committee (GBC) and subsequent multistakeholder committees.

In order to become certified under the MarinTrust programme, applicants must be able to demonstrate compliance with the Standard criteria, through a third-party audit conducted by an independent, ISO 17065 accredited **Certification Body** approved to certify against MarinTrust Standards. Certificate holders who have demonstrated compliance to the MarinTrust Standard(s) can apply to the MarinTrust Secretariat for use of the Certified MarinTrust Logo 2.

The MarinTrust Programme is recognised and endorsed throughout the marine ingredient value chain and by aquaculture certification programmes including BAP, ASC and Global GAP, as well as feed manufacturers, retailers and pet food manufacturers.

<sup>&</sup>lt;sup>1</sup>The official language of this standard is English. The definitive version is maintained at <a href="www.marin-trust.com">www.marin-trust.com</a>. Any discrepancy between copies, versions or translations shall be resolved by reference to the definitive English version.

<sup>&</sup>lt;sup>2</sup> Further Information regarding application, rules and regulations can be found on the MarinTrust website <a href="www.marin-trust.com">www.marin-trust.com</a> or by contacting Standard Owner at <a href="standards@marin-trust.com">standards@marin-trust.com</a> and/or approved Certification Bodies listed <a href="https://example.com">here.</a>.



## Introduction

# Introduction to the MarinTrust Chain of Custody standard (CoC)

In 2018 MarinTrust Chain of Custody Standard V1.1 underwent an extensive review, in line with good practice and in compliance with the ISEAL Standard Setting Code requirement. This review identified areas of opportunity and improvement and these were documented in a new Terms of Reference for the development of a MarinTrust Chain of Custody Standard V2.

The MarinTrust Chain of Custody Standard V2 was published on 31 August 2020 and is effective from 30 November 2020.

Through the Programme framework, the requirements for certification are subject to continual review and improvement. Subsequent reviews of the standard will be carried out at least every five years to ensure continued relevancy and effectives to achieve its stated objectives.

The purpose of this new Chain of Custody standard is to provide the industry with a clear statement of the requirements of Chain of Custody Certification and to provide an assurance to a labelled Certified claim on a feed or fish oil product that it uses marine ingredients that originate from a Certified 'MarinTrust Factory'.

#### **Key Objectives**

- To ensure that marine ingredients used come from MarinTrust certified sources and that full traceability is maintained throughout the supply chain.
- To ensure no Illegal, Unreported and Unregulated (IUU) fishery materials are used
- To ensure pure and safe products are further processed under a robust Quality Management System, thereby demonstrating freedom from potentially unsafe and illegal materials
- To ensure that MarinTrust CoC standard remains relevant, robust and fit for purpose.
- To prevent non MarinTrust compliant product being labelled as MarinTrust.



# Main features of the revised MarinTrust Chain of Custody Standard

The key features of the MarinTrust Chain of Custody Standard V2 are summarised below:

#### 1) Audit Technology

• Use of emerging technology (e.g. Key Data Element transfer through the supply chain) to source the origin of certified MarinTrust compliant marine ingredients

#### 2) Standard Collaboration

• Recognition of other standards and regulatory authority standards to meet in part or in full the requirements of the MarinTrust Chain of Custody Standard

#### 3) Quality Assurance

- Identify ways of detecting fraudulent activities (e.g. adulterations and substitution) by having rigorous traceability system checks e.g. mass balance checks and volume reconciliations within the standard and systems to handle non-conforming products
- Improve the use of the MarinTrust Logo and claim to protect the integrity of the entire programme
- Continue the current certification model to ensure it remains in alignment with ISO 17065 and the ISEAL Assurance Code.

#### 4) Streamlining Requirements

Standard and Certification Requirements at each link in the chain need to be reviewed
to seek areas of opportunity to streamline, especially in the wholesaler/trader/subcontractor segments.



# The Key Changes from MarinTrust Chain of Custody (CoC) Standard V1.1 to V2 are summarised as follows:

Section	CoC V1.1	CoC V2	Differences
1	General Principles of Traceability	General Principles of Traceability	New clauses relating to Supplier approval and monitoring systems including traders and involving agents/brokers with batch control (KDEs), HACCP/VACCP/TACCP requirements with greater emphasis on material origin.
2	Traceability within the Supply Chain	Traceability Verification and Labelling	Revised clauses covering  Mass balance calculations  Labelling and segregation to cover all facility activities where applicable from initial storage, processing, final dispatch, final storage, delivery for client, etc.
3	Traceability and Labelling	Sub-contractors	New section – evaluation and documented control of subcontractors used by a facility including mass balance exercises and product integrity
4		Use of the Certification Logo or Claim	Reinforced section – label verification and control over the use of the MarinTrust logo or claim.
5		Staff training and Key Representatives Responsibilities	New section – introduction of documented training system for relevant staff members
6		Requirements for IP Marine Ingredients	New section – For CoC holders that <b>ALSO</b> handle IP material. Cover <b>verification of origin, segregation</b> and effective traceability testing.



## Scope and Applicability

The standard applies to marine ingredient processing facilities, defined as being the unit of certification. These include all locations and scales of operation for marine ingredient processing activities such as: further processing, packing, refining and/or trading of marine ingredients after the certified MarinTrust marine ingredient producing site.

This document outlines the requirements that shall be achieved for certification to the MarinTrust Chain of Custody Version 2.0 Standard and defines the criteria for the sourcing and manufacturing of marine ingredients.

Applicants must have been in production for a minimum of 6 months prior to the certification audit date, however, applicants may apply to the programme prior this in order ensure that they are audit ready.

### **Eligibility and Prerequisites**

A Potential applicant could be a:

- Primary Processor/Packer
- Storage Provider
- Oil Refiner
- Secondary Processor
- Trader

Potential applicants are advised to carry out a self-assessment against the Standard in order to ascertain their readiness for external assessment. Applicants must ensure that they have all necessary records of performance data covering the periods of time specified in the Standard available immediately prior to the audit for certification.

For the applicant to qualify for application and subsequent certification against the MarinTrust CoC Standard, it shall meet the following prerequisite eligibility requirements:

- The applicant facility shall be involved in the processing/packaging, refining/storage/trading/blending activities of certified MarinTrust marine ingredients and, (if available) marine ingredients from the MarinTrust Improver programme.
- 2) The applicant facility shall be legally licenced in the country of operation.
- 3) The applicant's facility **shall provide evidence** that they satisfy the following minimum entry criteria for the scope under certification:
  - a) **Food safety certification** GFSI food safety benchmarked schemes if handling certified marine ingredients for human consumption. Third Party Good Manufacturing Practices (GMP) certificate e.g. if handling marine ingredients for animal feed.
  - b) **Social accountability** meet the requirements of the national regulatory authorities that oversee their operation.



- c) **Environmental accountability** meet the requirements of the national regulatory authorities that oversee their operation.
- 4) A disclaimer stating that the audit is limited to the CoC (regulatory requirements, traceability, mass balance, labelling, MarinTrust logo use) shall be signed.

MarinTrust and its certified marine ingredient producers shall not be liable in the event the products handled at the facility and/or the facility are implicated in legal, social, environmental, food safety situations.

#### Normative References

The documents listed below, contain provisions that underpin this MarinTrust CoC Standard:

- ISO 19011:2018 Guidelines for auditing management systems
- ISO/IEC 17021-1:2015 Conformity assessment Requirements for bodies providing audit and certification of management systems
- ISO/IEC 17065:2012 Conformity assessment Requirements for bodies certifying products, processes and services
- ISO/IEC Guide 2:2004 Standardisation and related activities
- ISO 22005:2007 Traceability in the Feed and Food Chain
- ISO/CD22095 Chain of Custody
- ISO 12875/77:2011 Traceability for finfish products
- Global Food Safety Initiative Guidance Document Issue 7.1
- Codex Alimentarius HACCP Standards
- GMP+ animal feed standards
- IFFO RS Chain of Custody Standard V1.1 2013
- Global Dialogue on Seafood Traceability (GDST)
- GS1 Global Traceability Standard
- GS1 Foundation for Fish, Seafood and Aquaculture Traceability Guideline
- MarinTrust logo guidelines



### **Legal References**

Applicants shall fully meet the legal obligations that are in place for the jurisdiction(s) where marine ingredients are processed to be considered for certification. This certification does not exempt an applicant from meeting their legal obligations and if they are successfully prosecuted by their regulatory jurisdiction their certification status to this standard shall be investigated and may be withdrawn depending on the nature of the offence committed.

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

## Acknowledgements

MarinTrust would like to thank the members of the MarinTrust Governing Body Committee, the MarinTrust Technical Advisory Committee and the MarinTrust Standards Steering Committee for their commitment, expertise and contributions throughout the development of the new version of the MarinTrust Chain of Custody Standard V2.0.



# SECTION 1 – General Principles of Traceability

**1.1** The applicant shall have a documented and signed policy that states that they are committed to achieving and adhering to the requirements of the MarinTrust Chain of Custody (CoC) Standard.

**Full Compliance:** The applicant site has a written commitment to the MarinTrust Chain of Custody Standard. This document has been approved and signed by the site's CEO or an equivalent senior manager.

**1.1.1** The applicant shall have a process to ensure that this policy is communicated to all staff within the site.

**Full Compliance:** The applicant can demonstrate that this policy has been fully communicated to <u>all</u> staff within the facility. For example, during new staff inductions, staff training etc

#### **Additional Notes**

The rationale of this clause is to re-enforce that all staff in the applicant's organisation are aware of this commitment to this standard to drive positive behaviour to ensure they continuously meet the requirements of the standard. This policy could be communicated through various channels such as training workshops, new staff inductions, posters etc.

**1.2** The applicant shall have a documented and **effective supplier approval and monitoring system** to ensure that incoming marine ingredients intended to be identified as compliant, are sourced from an approved fishery, or a certified supplier that holds a valid MarinTrust or MarinTrust CoC certification.

**Full Compliance:** The applicant will have an up-to-date system of MarinTrust certified suppliers and be able to demonstrate that they hold a valid MarinTrust or MarinTrust CoC certification.

#### **Additional Notes**

The applicant shall ensure that only marine ingredients that has been produced in an MarinTrust certified site from an approved MarinTrust fishery or recognised MarinTrust -MSC fishery are used to produce compliant marine ingredients. Ideally the Marin Trust certified material Suppliers should be



listed separated on their own approved supplier list from those that do not handle MarinTrust certified Marine ingredient to clearly show separation, but a single list would also be ok, as long as the Marin Trust certified material suppliers were clearly identified.

- **1.2.1** MarinTrust compliant marine ingredients that are purchased via a third-party agent, or broker that does not physically handle or own the certified product the following shall apply:
  - **1.2.1.1.** The **applicant shall have documents/evidence provided from these suppliers** in place, to prove the identity of the marine ingredients back to an approved fishery or by product.

**Full Compliance:** If the third-party is not certified to the MarinTrust CoC Standard they can provide full documentation to allow complete traceback of marine ingredients to approved fishery, or a supplier that holds a valid MarinTrust or MarinTrust CoC certificate for factory marine ingredients

#### **Additional Notes**

The applicant shall ensure that only marine ingredients that has been produced in an MarinTrust certified site from an approved MarinTrust fishery or recognised MSC fishery are used to produce these compliant marine ingredients.

If an agent or broker does own the product then they will be treated as any other supplier and need an MarinTrust CoC certificate, if they do not wish to be certified then they will be treated as a subcontractor to the applicant and follow the requirements in Section 3

1.2.1.2 The applicant shall ensure that they have been trained/made aware/informed on the requirements to maintain the product integrity status of these certified materials and shall sign a form stating their commitment to the MarinTrust CoC standard.

**Full Compliance:** If the third-party agent or broker is used to source supplies of the MarinTrust compliant marine ingredients there shall be documented evidence that training has been undertaken by the applicant to this entity to ensure that they fully understand and commit to comply with the requirements of the MarinTrust CoC standard to maintain the product integrity of the MarinTrust compliant marine ingredients. After this training has been completed, the agent/broker should sign a declaration that they understand the requirements and will comply with them.



1.2.1.3 The applicant shall ensure that they have been trained/made aware/informed of the requirements to maintain the product integrity status of these certified materials by an approved consultant or trainer to the MarinTrust programme.

**Full Compliance:** There is full documentary evidence that all agents/brokers have been trained by an approved trainer /consultant to the current MarinTrust standard

#### **Additional Notes**

<u>Approved consultant or trainer/training provider</u> is the appointed individual by the applicant that has a good and clear understanding of the marine ingredients processing activities and the current version of the MarinTrust Chain of Custody Standard.

1.3 A batch/lot record of all MarinTrust compliant marine ingredients is fully maintained.

Full Compliance: Batch/lot record of all MarinTrust compliant marine ingredients is fully maintained.

#### **Additional Notes**

A batch/lot record is required for the traceability verification test (see clause 2.5 requirements) and volume reconciliation and will support in fraud mitigation from duplication or substitution.

- **1.3.1** The batch/lot record shall contain the following information;
  - Supplier name
  - Supplier unique MarinTrust certificate number
  - Volume of MarinTrust compliant marine ingredients received from each supplier.

The following clauses are Derogated

- 1.3.1.1 The batch/lot record shall contain the following information; (DEROGATION CLAUSE)
  - Key Data Element (KDE) information on the source fishery for whole fish to include, fishing vessel(s), species, catch area and date of landing
  - Key Data Element (KDE) information on source processing factory for by-product trimmings to include factory name, species and date of processing.



**Full Compliance:** Supplier details, volumes of product, and KDE information is comprehensive and appears to have been entered correctly.

#### **Additional Notes**

It is important to record this data as it can be used to document where and how much material the applicant is using to a) ensure that a credible statement and assurance can be given to their customer and b) can be used to mitigate potential acts of fraudulent behaviour through duplication or substitution

If traders are used within the supply chain, addition information may or will need to be sourced to see if this link in the chain undertook any blending operations of the fish meal or fish oil batches to meet with a customer's bespoke requirements. If blending has occurred, the raw material inputs should be able to be traced back to source.

If a KDE records system is adopted, then a lot of this standard could be streamlined into a verification of data input into a third-party digital platform. Use the KDE definitions as described in the Global Seafood Traceability Dialogue GDST

This clause's KDE subcomponents have been derogated as ones that shall allow an applicant a complete certification cycle from their initial certification to this new standard only, to be completed, prior to it been rated for conformance to this MarinTrust CoC Standard. The effected applicant shall ensure they have an effective action plan in place, to provide documentary evidence to prove they are making measurable progress to full conformity to this clause and all its subcomponents within this certification cycle.

**1.4** The applicant shall have a **documented product management system** in place to demonstrate how MarinTrust compliant marine ingredients are **segregated and labelled** from non-certified product during all the processes within the Applicant's organisation.

**Full Compliance:** The applicant has a demonstrably effective product management system in place to keep labelled MarinTrust product **segregated** from marine ingredients that are produced from non-approved material

#### **Additional Notes**

**Also see requirements for clauses 2.1 and 2.2.** The product management system will be appropriate to the context of the organisation. If for example the organisation only ever deals with MarinTrust compliant products, then this could be a specific document/ statement.

If the organisation deals with multiple product lines of similar non-compliant product the organisation will have to document in their product management system how MarinTrust compliant marine ingredients are kept segregated and labelled from non-compliant products, paying particular attention to key handing points (see subclauses for 2.1 and 2.2) where risk of misidentification / substitution could occur.



**1.5** The applicant shall have in place an effectively implemented procedure to deal with any non-conformances arising from a failure of the marine ingredients product management system stated in 1.4, which may result in MarinTrust compliant marine ingredients being mixed with non-compliant material.

**Full Compliance:** The applicant will have a **procedure in their product management system on how** to deal with the case where a loss of traceability or eligibility of MarinTrust compliant material has occurred. This procedure shall include a full root cause analysis as to why this non-conforming product occurred.

#### **Additional Notes**

The applicants CB (see clause 1.6.3) and customer (see clause 1.6.4) will be notified in the event of a non-conforming product procedure being activated.

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.

If a non-conforming product procedure has been activated the applicant can demonstrate that this was implemented effectively.

The non-conforming product procedure would ideally be captured in the applicant's product management system.

If a non-conforming product procedure has been activated previously the applicant can show that they have implemented this effectively (though see subclauses 1.6.1 - 1.6.4).

**1.6** Any Corrective Action Plans resulting from a non-conforming products procedure shall be accurately documented and shall include a root cause analysis

Full Compliance: Corrective Action Plans have a root cause analysis and have been accurately documented.

OR

No non-conforming product procedure activated.

#### **Additional Notes**

Some of sub-clauses 1.6.1 - 1.6.4 may not be relevant if the applicant has not been required to instigate a non-conforming products procedure. Any previous non-conformances that the applicant has raised should not be flagged as an NC for the purpose of this audit if the applicant can demonstrate how these NCs were acted on, and safeguards put in place to reduce the risk of a similar NC occurring in the future.



**1.6.1** Corrective Action plans shall identify authorised responsible personnel to handle the remedial changes required, based on their severity or risk.

Full Compliance: Authorised responsible personnel identified based on the risk level of the non-compliance identified.

OR

No non-conforming product procedure activated.

#### **Additional Notes**

Responsible personnel need to be identified so somebody has ownership of the remedial changes within the Corrective Action Plan.

**1.6.2** All remedial changes shall be part of a corrective action plan to mitigate these incidents happening again in future and shall be time specified.

**Full Compliance:** Remedial changes are clearly stated and time bound. They are shown to be part of a plan to ensure these incidents are mitigated against in future.

OR

No non-conforming product procedure activated.

#### **Additional Notes**

Any remedial changes will inform improvements made to the **product management system (clause 1.4)** and/ or **non-conforming product procedure (clause 1.5)** to ensure similar incidents are mitigated in future.

**1.6.3** The applicant shall notify their certification body within 24 hours of a product recall being actioned as result of this non-conforming product procedure being activated.

**Full Compliance:** The applicant will have a procedure in their management system on the product recall requirements for MarinTrust certified marine ingredients. In this procedure, there will be a list of contacts that should be informed and one of these will need to be the certification body that awards them their MarinTrust certificate. The time frame for informing the certification body (i.e. **within 24 hours**) shall be stated within this procedure.



**1.6.4** The applicant shall inform any customer affected by a non-conforming MarinTrust product **immediately, and no later than 24 hours** following detection.

Full Compliance: Customer has been informed within 24 hours of an issue being detected.

OR

Non-conforming product procedure activated.

#### **Additional Notes**

Ideally the customer should be notified as soon as possible so they do not inadvertently claim that the product is MarinTrust certified.

1.7 All records relating to the execution of the non-conforming product procedure shall be retained for a period of at least 3 years.

**Full Compliance:** The applicant will have a procedure that requires all records for non-conforming products to be kept for three years in their management system. The records can either be in a hard or electronic format. The auditor should take a sample of records to confirm that this procedure is being adhered to.

#### **Additional Notes**

This is standard good practice. Where a Minor Non-Conformity is raised due to records not being maintained for a sufficiently long duration. In these circumstances, the Minor Non-Conformity will remain Minor as long as records continue to be built up. This is to reflect the impossibility of creating 3 years of records in 1 year.

**1.8** The applicant shall have a HACCP system in place to protect the integrity of products being produced within their operation.

**Full Compliance:** The HACCP system is appropriate to the specific circumstances at the facilities under assessment (i.e. is the manufactured product for human or animal consumption?).

#### **Additional Notes**

Note that the requirements of this clause may not be required for organisations that are not undertaking any processing (e.g. traders).



Hazard Analysis Critical Control Point (HACCP) evaluates the entire production process step by step from delivery intake to packaging and transport of the completed product. During the HACCP any stages where the product could be subject to **physical, microbiological or chemical contamination** are identified. Measures are put in place for those deemed critical (i.e. temperature controls, cleaning etc.) and these are regularly monitored to ensure that the end product is safe for human consumption.

If an applicant has a GFSI certification the auditor shall check to see what areas are covered within these certification requirements to help prove compliance with this standard clause.

**1.8.1** The applicant shall have a TACCP/VACCP system in place to protect the integrity of products being produced within their operation if intended for direct human consumption.

**Full Compliance:** The TACCP/VACCP system is appropriate to the specific circumstances at the facilities under assessment (i.e. is the manufactured product for human consumption?).

#### **Additional Notes**

Note that the requirements of this clause may not be required for organisations that are not undertaking any processing (e.g. traders).

Threat Assessment Critical Control Point (TACCP) is concerned with the prevention of deliberate and intentional food fraud. This can take the form of substitution of ingredients, passing off of one foodstuff for another, false or misleading statements for economic gain that could impact public health, product tampering, fake or incorrect labelling etc.

**Vulnerability Assessment Critical Control Point (VACCP)** identifies how vulnerable various points in the supply chain are to the threat of economically motivated adulteration.

If an applicant has a GFSI certification the auditor shall check to see what areas are covered within these certification requirements to help prove compliance with this standard clause.

Some facilities will now have BASC (Business Alliance for Secure Commerce) certification which should also provide evidence of compliance with the intent of this clause



# SECTION 2 – Traceability Verification and Labelling

**2.1** MarinTrust compliant marine ingredients, or the finished product, **shall** be labelled or otherwise identified in a manner that ensures traceability is maintained during the following key traceability steps MarinTrust:

**Full compliance:** Applicant ensures that MarinTrust compliant materials and finished products are identifiable at all stages outlined in clauses 2.1.1 – 2.1.8 with required documentation in place.

#### **Additional Notes**

Documentation received with certified products needs to clearly identify the product as certified. This may include the following:

- delivery notes,
- invoices,
- · bills of lading, or
- official documents in an electronic format from the supplier.

Information captured upon receipt pertaining to the batch/lot record (clause 1.3.1) must not be lost during production to ensure that full traceability can be maintained (clause 2.3). If a supplier uses an internal system (such as barcodes or product codes) to uniquely identify certified products on documents, the applicant must understand the supplier's description in order to confirm the product is certified.

Note- some production codes used in facilities may not be used on the finished product. If this is the case care must be taken to ensure that the sales invoice or a purchase order/number etc can be linked back to these production codes to ensure that full traceability can be established

Additionally, it is recommended that certified products are identifiable as certified on the physical product as well as on the accompanying traceability records. This can be done by placing a sign or label on the package, container, or pallet. Organisations can use a variety of methods to identify certified products, including acronyms (e.g., 'MarinTrust'), the CoC certification code, or another internal system of identification.

Where it is impossible or impractical to label physical products, the applicant will need to demonstrate how the product can be linked with associated.

Where it is impossible or impractical to label physical products, the applicant will need to demonstrate how the product can be linked with associated traceability or inventory records that specify the certified status



#### **2.1.1** from the point of receipt,

Full compliance: MarinTrust compliant materials arrive clearly labelled (where this is feasible) with appropriate documentation.

#### 2.1.2 during initial storage,

**Full compliance:** MarinTrust compliant materials are clearly labelled in storage, and there is an inventory showing where MarinTrust compliant materials are stored.

#### 2.1.3 during processing,

Full compliance: During processing the batch/lot number(s) of the MarinTrust compliant material is recorded.

#### **2.1.4** during work in progress storage,

**Full compliance:** MarinTrust compliant materials are clearly labelled in storage, and there is an inventory showing where MarinTrust compliant materials are stored.

#### 2.1.5 during packaging,

**Full compliance:** Packaging is correctly labelled/ claims are correct. Associated documentation is in place that would allow traceability of the packaged product back to supplier / source fishery.

#### **Additional Notes**

See Section 4 use of certification logo/ claim. If subcontractor also see Section 3 requirements.



**2.1.6** during final storage, and third-party storage

**Full compliance:** MarinTrust compliant materials are clearly labelled in storage, and there is an inventory showing where MarinTrust compliant materials are stored.

#### **Additional Notes**

As 2.1.2. If subcontractor also see Section 3 requirements.

#### 2.1.7 during final dispatch, handling

**Full compliance:** Invoice for product contains batch/lot codes to allow buyer of the MarinTrust compliant product to traceback to supplier/ source fishery if required.

#### **Additional Notes**

If subcontractor also see Section 3 requirements.

#### 2.1.8 during delivery to their customer

Full compliance: Upon delivery, buyer receives copy of a delivery note (or invoice) stating batch/lot codes of MarinTrust compliant product.

#### **Additional Notes**

If subcontractor also see Section 3 requirements.

- **2.2** The applicant shall have documented evidence that MarinTrust compliant marine ingredients are segregated from non-certified product by either:
  - Physical separation, or
  - Temporal separation,

during the following key traceability stages MarinTrust:

**Full compliance:** Throughout the production process MarinTrust approved materials and the MarinTrust approved finished product(s) are kept physically or temporally segregated from non-certified products, and the applicant can provide evidence of this.



2.2.1 from the point of receipt,

**Full compliance:** MarinTrust compliant materials are delivered separately/ clearly segregated from non-certified materials.

#### **Additional Notes**

In case of fishmeal or fish oil in bulk, although there are dedicated lines for discharge or a procedure to separate them temporally there shall be a process to prevent an unintended mixture

2.2.2 during initial storage,

Full compliance: MarinTrust compliant materials are kept separate from non-certified materials in storage.

2.2.3 during processing,

**Full compliance:** A separate processing line is used for MarinTrust compliant materials or processing of MarinTrust compliant materials from uncertified materials is temporally segregated.

2.2.4 during work in progress storage,

**Full compliance:** MarinTrust compliant materials are kept segregated from non-certified materials in storage.

2.2.5 during packaging,

Full compliance: MarinTrust compliant products are packed separately from non-certified products.

#### **Additional Notes**

See Section 4 use of certification logo/ claim. If subcontractor also see Section 3 requirements.



2.2.6 during final storage and third-party storage,

**Full compliance:** MarinTrust compliant materials are kept segregated rom non-certified materials in storage.

#### **Additional Notes**

If subcontractor also see Section 3 requirements. If not, in case of fishmeal or fish oil in bulk, although there are dedicated lines for discharge or a procedure to separate them temporally or physically, there shall be a process to prevent any unintended mixing of non-certified material with certified MarinTrust material

#### 2.2.7 during final dispatch, handling

Full compliance: MarinTrust compliant materials ready for final dispatch are kept segregated from non-certified materials.

#### **Additional Notes**

If subcontractor also see Section 3 requirements.

#### 2.2.8 during delivery to customer

Full compliance: During delivery MarinTrust compliant materials are kept segregated from non-certified materials.

#### **Additional Notes**

If subcontractor also see Section 3 requirements.



**2.3** The applicant shall maintain accurate records of the quantities / volumes of MarinTrust compliant marine ingredients and the finished product bought and sold (or received and dispatched) which take into account production practices that could affect the final quantity or volume calculations using a MASS balance exercise.

**Full compliance:** The applicant maintains accurate up-to-date records of quantities/ volumes of fishmeal/ fish oil /finished product bought and sold across their entire product range.

#### **Additional Notes**

To obtain the percentage of MarinTrust certified material inputs used in the applicant's operation, calculate the annual sum of certified MarinTrust marine ingredients inputs divided by total Annual sum of all marine ingredient materials used. This shall need to be reported to MarinTrust so that % of certified MarinTrust compliant material sold in the final product cannot be exceeded, therefore mitigating against potential fraud through duplication or substitution.

If no records of quantities/volumes have been kept, the applicant will have 3 calendar months if they are a new applicant and 1 calendar month if an existing client to ensure that they have a procedure in place to ensure that they start building up records prior to the next audit. If this is the case, this will be the focus of the subsequent surveillance audit.

2.4 The applicant shall report on input quantities and finished product quantities used on a quarterly basis to MarinTrust (DEROGATED CLAUSE)

**Full compliance:** The applicant reports on input quantities and finished product quantities to MarinTrust after the derogation period has elapsed on a quarterly basis. These records can be obtained from MarinTrust.

#### **Additional Notes**

The intent of this is so that MarinTrust can continuously monitor applicants input and finished product quantities between audits to ensure that % of certified MarinTrust compliant material sold in the final product cannot be exceeded.

This is a derogated clause to allow time for confidential agreement to be drawn up between an applicant and MarinTrust to ensure that this sensitive commercial information can be suitability data protected.



**2.5** The applicant shall conduct a documented verification test of their product management system across the entire range of MarinTrust compliant marine ingredients or finished product by batch/lot number or volume produced.

**Full compliance:** Following the **Traceability Test,** complete traceability can be demonstrated following batch/lot numbers for the entire range of MarinTrust compliant marine ingredients and finished products. If a **mass balance** exercise is undertaken the volume/ weight of seafood in MarinTrust compliant finished products does not exceed the weight of MarinTrust compliant raw materials.

#### **Additional Notes**

The applicant should display the findings from the traceability test in the **Traceability Test** Template and if appropriate a Mass Balance exercise should be undertaken (see tabs in supplementary spreadsheet entitled **Traceability verification test – guidance and templates**).

The MASS Balance exercise is particularly important if the factory is a processor that also processes non-certified fish products that are of similar nature to the certified fish products. This to provide assurance that the volume/ weight of seafood in MarinTrust compliant finished products does not exceed the volume/ weight of MarinTrust compliant input materials.

**2.5.1** This verification test shall be carried out at least once per year with a gap no greater than 12 months between tests, and shall include a traceability challenge both from receipt to despatch and from despatch back to receipt

**Full compliance:** The applicant can demonstrate that the verification test has been carried out at least once per year, and that a **trace forward** (receipt to dispatch) and **trace backwards** (dispatch to receipt) traceability test has been carried out for the full range of MarinTrust compliant products.

#### **Additional Notes**

MarinTrust compliant materials from suppliers can be traced forward to final dispatch of the finished product.

MarinTrust compliant materials in finished products **must also be able to be traced back to supplier and source fishery**. Note that production may use a range of different sources of MarinTrust compliant materials, as such several suppliers and source fisheries may be identified.



**2.6** Any Corrective Action Plans resulting from non-conformities raised during this verification test of the product management system shall be accurately documented;

**Full compliance:** Non-conformities and corrective action plans are fully documented by the applicant in the template in the **Non-Compliance tab** in the supplementary spreadsheet entitled *Traceability verification test – guidance and templates.*OR

No non-conformities were raised during the applicant's verification test.

#### **Additional Notes**

It will be responsibility of the applicant to ensure that non-conformities from the verification test will be corrected. The intent here is to enable the applicant to routinely test their product management system and make improvements if necessary. This is considered to be industry good practice. Note that the applicant will not receive any NC from the auditor for identifying non-conformities during the verification test as long as they can demonstrate that NCs raised during the verification test have been corrected. This will encourage the applicant to be transparent. If no non-conformities were raised by the applicant and the auditor is happy that a comprehensive verification test has been carried out, this clause and sub-clauses 2.6.1 – 2.6.2 will not be relevant.

2.6.1 Corrective Action Plans shall identify authorised responsible personnel to handle the remedial changes required

Full compliance: Authorised responsible personnel are identified to handle any remedial changes.

OR

No non-conformities were raised during the applicant's verification test.

#### **Additional Notes**

Responsible personnel need to be identified so somebody has ownership of the remedial changes.

**2.6.2** All remedial changes shall be part of Corrective Action plan to mitigate these incidents happening again in future and shall be time specified.

**Full compliance:** Remedial changes are clearly stated, time bound and part of a plan to mitigate these incidents happening again in the future. OR



No non-conformities were raised during the applicant's verification test.

#### **Additional Notes**

This should also inform improvements to the non-conforming products procedure (see clauses 1.5 and 1.6) to mitigate the risk of similar non-conformities being raised in the future.

**2.7** Where processing or packing / repacking occurs, records shall allow conversion rates for the finished product outputs from MarinTrust compliant marine ingredients inputs over any given batch or time period to be calculated.

**Full compliance:** Records of quantities/ volumes of input materials and processed or packaged products are comprehensive to allow conversion rates for the finished product outputs to be calculated. The % of certified MarinTrust compliant material in the final product cannot exceed that of the input materials.

#### **Additional Notes**

For guidance on calculating conversion rates please refer to the MASS Balance tab in supplementary spreadsheet entitled *Traceability verification test* – *guidance and templates.* 

If no records of quantities/volumes/quality parameters have been kept, the applicant will have 3 calendar months if they are a new applicant and 1 calendar month if an existing client to ensure that they have a procedure in place to ensure that they start building up records prior to the next audit. If this is the case, this will be the focus of the subsequent surveillance audit

**2.7.1** Conversion rates for processing of the finished product that has used MarinTrust compliant marine ingredients shall be justifiable, and verifiable

Full compliance: Conversion rates have been properly calculated and are verifiable and justifiable.



**2.8** The Applicant shall conduct an annual **internal monitoring audit of all MarinTrust processes including a documented product recall test or after traceability-based complaint or incident** test to ensure that the non-conforming product procedure as stated in 1.5 is functioning correctly and effectively.

**Full compliance:** The Applicant can evidence that an internal monitoring audit and documented product recall test has been carried out. They should be able to demonstrate that the procedure is functioning correctly and would be effective should it have to be used. Any failings have been identified and rectified.

**2.9** All traceability and identification records **shall** be **kept for the shelf life of the product, or a minimum of 3 years, whichever is longer.** 

Full compliance: All traceability and identification records have been kept for a minimum of 3 years.

#### **Additional Notes**

If a minor Non-Conformity is raised due to records not being maintained for a sufficiently long duration. In these circumstances, the Minor Non-Conformity will remain Minor as long as records continue to be built up. This is to reflect the impossibility of creating 3 years of records in 1 year. If no traceability and identification records have been kept, the applicant will have 3 calendar months if they are a new applicant and 1 calendar month if an existing client to ensure that they have a procedure in place to ensure that they start building up records prior to the next audit. If this is the case, this will be the focus of the subsequent surveillance audit.

2.9.1 All records used to provide evidence of compliance to this MarinTrust CoC Standard shall be accurate, legible and unadulterated.

Full compliance: All records are accurate, legible and unadulterated.



**2.10** The applicant shall co-operate with the Certification body and/or MarinTrust CoC Standard holder if they are asked to participate in an MarinTrust product integrity investigation by the supplying of documentary evidence within 5 days of a request for information.

**Full compliance:** The applicant fully co-operates with the CB and/ or MarinTrust should the need arise for a product integrity investigation. Documentary evidence is supplied within a period of 5 days from the receipt of a request for information.

#### **Additional Notes**

Ideally there should be a written agreement in place between the applicant and certification body as part of the certification contract.



# SECTION 3 – Subcontractors

**3.1** Where the applicant utilises the services of a subcontractor (carrying out contract storage, processing, packing, labelling), the subcontractor shall be audited by the applicant's certification body and **shall be compliant with the requirements of the MarinTrust CoC Standard.** 

**Full compliance:** The applicant can demonstrate that subcontractor(s) facilities have been audited as part of the applicant's certification to the MarinTrust CoC Standard, and the subcontractor's facilities are in compliance with the standard.

#### **Additional Notes:**

Clauses in Section 3 will not be applicable if the applicant does not use subcontractors or the services of third-party transport companies. If subcontractors are used, they will be part of the applicant's certification to this standard. Prior to the audit of the applicant's facilities the applicant should have requested any subcontractor(s) to will be part of the audit plan and will need to assess for compliance against the MarinTrust CoC Standard. CoC audits for subcontractor facilities would be co-ordinated by the CB, this to ensure that the subcontracting facility has been audited and found to be compliant with the standard prior to the audit of the applicant's facilities.

In the case of a trader that buys fishmeal or fish oil from a MarinTrust certified factory,

- a) the purchased fishmeal or fish oil is kept at the storage facility of the certified plant or at a storage that has MarinTrust CoC. Only paperwork is required to prove that the volume reconciliation of compliant MarinTrust material is accurate or in
- b) if the purchased fishmeal or fish oil is kept in another storage facility that is not MarinTrust this will need to be audited to ensure that the MarinTrust compliant material is not being mixed with non MarinTrust material.
- **3.2** The applicant shall maintain an up-to-date record of the names and addresses of all approved subcontractors handling MarinTrust compliant marine ingredients and the identity of the certified finished products.

**Full compliance:** The applicant maintains an up-to-date record of the names and address of all approved subcontractors handling MarinTrust compliant marine ingredients and the identity of the finished products.

#### **Additional Notes**

This is good practice; a record will help the applicant manage their subcontractors and keep on top of where MarinTrust compliant products are going.



**3.3** If third party storage facilities are used, the applicant shall have the ability to request the MarinTrust compliant marine ingredients and the certified finished products records from subcontractor storage facilities to allow for verification at any point in time.

**Full compliance:** The applicant can provide evidence (such as that stated in a contract/ MOU) that the subcontractor will provide records of MarinTrust compliant materials and certified finished products should the applicant require.

#### **Additional Notes**

This would be a consideration for the applicant's product management system to take into account. So as to ensure any potential risks around using subcontractors are fully taken into account in case of a non-conforming product procedure.

**3.4** The applicant shall have a signed agreement with all subcontractors handling the MarinTrust compliant marine ingredients and the certified finished products.

**Full compliance:** The applicant has a signed agreement in place with all subcontractors that handle MarinTrust compliant marine ingredients.

#### **Additional Notes**

The purpose of this agreement is to ensure that the subcontractor is clear that their operations must be in compliance with the MarinTrust CoC standard when they are handling MarinTrust products.

**3.4.1** This agreement shall ensure that the subcontractor has documented systems in place to ensure full traceability, segregation, and identification of the MarinTrust compliant marine ingredients and the certified finished products at every stage of handling in compliance with this MarinTrust CoC Standard.

**Full compliance:** The agreement specifies that the subcontractor has documented systems in place to ensure full traceability, segregation, and identification of the MarinTrust compliant marine ingredients and the certified finished products. Every stage of handling is stated to be in compliance with the MarinTrust CoC Standard.



**3.5** Where an applicant utilises the services of third-party transport companies, an agreement or equivalent documentary evidence shall be in place demonstrating that MarinTrust certified product integrity is ensured during transportation.

**Full compliance:** An agreement (or equivalent documentary evidence) is in place that specifies that the transport company keeps MarinTrust certified product separated and clearly identifiable from non-certified materials. The agreement also states that the transport container is kept clean and is free from any contaminants/ materials that may affect the quality/ safety of the product being transported.

**3.5.1** For bulk transported material, internal procedures and contractual agreements shall also include provisions that preclude the use of transport that may adversely affect the safety and/or integrity of any MarinTrust compliant marine ingredients materials due to the composition of a previous cargo.

**Full compliance:** In the agreement it is specified that the applicant has the right to refuse transportation should this adversely affect the safety and/ or integrity of the MarinTrust compliant marine ingredients. The third-party contractor will also agree to keep the condition of transport containers clean and free from contaminants.

#### **Additional Notes**

Due to possible risks of the composition of a previous cargo or through poor loading practices or through deliberate mistakes. It is considered to be good practice if additional sampling at origin and destiny is done to assure that no adulteration has been made during transport, especially with product in bulk fish oil



# SECTION 4 – Use of the MarinTrust Certification Logo or Claim

**4.1** The applicant shall only use the MarinTrust CoC certification logo or claim if it has valid certification to this MarinTrust CoC Standard.

**Full compliance:** The applicant has received certification and is now eligible to use the MarinTrust logo/ make claim after receiving permission from MarinTrust to do so. If this is the initial audit the applicant has not used the MarinTrust logo/ claim on any products, and they are aware they cannot do so until they are formally certified and received permission from MarinTrust to use the logo (see requirements for clause 4.1.1).

#### **Additional Notes**

If this is first time that the applicant has applied for MarinTrust CoC certification, the MarinTrust CoC certification logo or claim can only be used on MarinTrust compliant products following the applicant receiving a valid certificate to this MarinTrust CoC Standard, and receiving permission from MarinTrust to do so (clause 4.1.1).

If this is a surveillance audit and the applicant already has a valid certificate the applicant can continue to use the MarinTrust CoC logo and make claims as long as any NCs are dealt within the time limit agreed by the CB.3 calendar months if they are a new applicant and 1 calendar month if an existing client

Should a factory cease to be certified/suspended, whether through a failure to renew the certification or a failure to meet the requirements of the MarinTrust CoC Standard, the factory and the resulting products must no longer use the logo or claim to be MarinTrust certified.

The MarinTrust logo should be used only in connection with marine ingredients from certified fishmeal plants expressly identified in the list of certified plants in the MarinTrust website <a href="https://www.MarinTrust.com">www.MarinTrust.com</a> The MarinTrust Chain of Custody logo should be used only in connection with the marine ingredients from certified fishmeal plants expressly identified in the Chain of Custody Certificate issued to Licensee.

The statement "this product is MarinTrust compliant" can only be used if the marine ingredient factory and all the raw material meet the standard.



**4.1.1** The applicant shall only use the certification logo or claim if it has documented evidence demonstrating that it has been granted approval to do so by MarinTrust - the standard owner.

**Full compliance:** The applicant can provide documented evidence that they have received approval from MarinTrust to use the certification logo or claim.

If this is the first time the applicant has applied for MarinTrust CoC certification the applicant has not used the MarinTrust logo/ claim on any products, and they are aware they cannot do so until they have received approval from MarinTrust.

#### **Additional Notes**

The certificate holder shall provide its MarinTrust certificate number with the completed Terms and Conditions of Use. The certificate holder must allow Marin Trust Secretariat a reasonable time to review and approve in advance all of the MarinTrust logo on print and digital materials and packing (such as advertisements, packaging, web pages, collateral materials, POS materials, and video footage).

4.2 The applicant shall follow the current MarinTrust logo guidelines for any logo used on their products and shall be verifiable.

**Full compliance:** The applicant is fully compliant with the MarinTrust logo rules.

#### **Additional Notes**

According to the MarinTrust Programmes Logo Rules and Guidelines, the certificate holder must allow MarinTrust a reasonable time to review and approve in advance all of the MarinTrust logo on print and digital materials and packing (such as advertisements, packaging, web pages, collateral materials, POS materials, and video footage).

Samples of designs and where they are intended to be placed on products before should be sent to MarinTrust for approval via email to **standards@marintrust.com**. This should take no longer than 5-10 working days provided the logo rules and guidance has been followed accurately. To find out more about the logo rules and guidelines, please download the document from the downloads section.

Information on the MarinTrust logo rules can be found at <a href="https://www.marin-trust.com/marintrust-logo-guidelines">www.marin-trust.com/marintrust-logo-guidelines</a>. Auditors shall check that where the logo is used that it meets with these rule requirements



**4.3** The applicant shall operate a secure system for the production, storage and application of product labels bearing the MarinTrust CoC logo/claim to ensure that only compliant finished products are labelled as such.

Full compliance: The applicant will have a documented product management system (see clauses 1.4 - 1.6) and effective traceability (see Section 2) to ensure that the MarinTrust CoC logo/ claim is only used on compliant finished products. The production, storage, and application of product labels is secure and clearly managed.

#### **Additional Notes**

This is to mitigate any risk of labelling of products by unauthorised personnel.



# SECTION 5 – Staff Training and Key Representative Responsibilities

**5.1** The applicant shall put in place documented programmes covering the training needs of all KEY staff to the successful adoption of this MarinTrust CoC Standard.

**Full compliance:** There is a documented training programme and the applicant is able to demonstrate how this covers the training needs of all staff who are critical to the successful adoption of the MarinTrust CoC standard.

#### **Additional Notes**

Key staff that are critical to the successful adoption of this MarinTrust CoC Standard should be identified well in advance of the application, so as to ensure that adequate training can be provided to increase the likelihood of a successful audit.

**5.1.1** These documented training programmes shall include, as a minimum, identifying the staff training needs and the provision of training, to ensure that the staff have the necessary competencies to meet the requirements of this standard.

**Full compliance:** A training programme is fully documented, all key staff have been identified along with training needs. The provision of training to staff has also been documented to demonstrate that staff are competent to meet the requirements of the MarinTrust CoC Standard.

**5.1.2** The applicant shall review the effectiveness of all training provision on an annual basis.

**Full compliance:** The applicant can demonstrate that they review the training programme on an annual basis and make improvements if necessary.

#### **Additional Notes**

This will be particularly important if there is a high turnover of staff in the organisation.



**5.2** The applicant shall identify and appoint an individual (who also acts as the main contact for MarinTrust) who shall be responsible for all contact with the certification body and for responding to any requests for documentation or information related to CoC conformity.

Full compliance: The applicant has identified and appointed an individual who shall be responsible for all contact with the CB.

#### **Additional Notes**

Could be the person in charge of the HACCP team, but it will be up to the applicant so long as the person in charge has the authority to make changes to the processes and procedures and can give assurance that this standard is implemented effectively through all parts of the applicant's operations.

**5.3** The applicant's CoC key representative shall oversee the training provision review of the competencies of its staff, at least annually or after an incident.

**Full compliance:** The applicant's CoC key representative can demonstrate that they oversee the training provision review of the competencies of key staff at least annually or after an incident.

#### **Additional Notes**

Training may be in the form of formal workshops, refresher training or coaching, mentoring or on-the-job experience.

**5.3.1** Where additional training provision is required the applicant shall provide and conduct the relevant training in a time specified manner.

Full compliance: Additional training is provided in a timely manner.

#### **Additional Notes**

This is to ensure that the applicant has a plan with a timeframe to ensure it is completed before the next audit.

**5.4** Records of all training provision completed and planned shall be maintained and be accessible.

Full compliance: Documents recording training provision completed and planned are maintained and accessible.



**5.4.1** An employee training record shall include as a minimum:

- The name of the trainee and signed confirmation of attendance;
- The date of the training;
- The title or course contents, as appropriate;
- The training provider.

**Full compliance:** Training records provide the necessary details.

#### **Additional Notes**

<u>Approved consultant or trainer/training provider</u> is the appointed individual by the applicant that has a good and clear understanding of the marine ingredients processing activities and the current version of the MarinTrust Chain of Custody Standard.

**5.5** The applicant shall inform their certification body within 10 working days if they change their key representative member of staff and how they plan to induct a new member of staff to take over the role.

Full compliance: If there has been a staff change, the applicant informed the CB within 10 working days.



# SECTION 6 – Specific Requirements for Marine Ingredients sourced from a fishery that has been accepted into the MarinTrust Improver Programme

This section is only applicable if the applicant is handling a marine ingredient that is made from a raw material source from an accepted MarinTrust Improver Programme fishery. Details of all fisheries that are included within this Improver Programme can be located on the MarinTrust Website.

**6.1** The applicant shall be able to use marine ingredients from an improver programme if the following conditions apply

- The Improver Programme is recognised by MarinTrust
- The facility also uses marine ingredients that have been certified to the MarinTrust Factory Standard

**Full compliance:** The applicant site has a policy in place and documented evidence to prove that improver programme products are only sourced from a fishery within the IP and that they also use marine ingredients that are fully certified to the MarinTrust standard.

**Additional Notes** The sourcing of the MT certified product must be active during the whole time of certification and should be sourced every 12 months as a minimum. To avoid organisations from not meeting with the ethical requirements of the programme where the availability of MT certified product is lacking.



- 6.2 The applicant handling marine ingredients from a MarinTrust Improver Programme, shall comply with the following
  - **6.2.1** Marine ingredients coming from the MarinTrust Improver Programme shall be clearly identified from all marine ingredients from fully certified MarinTrust products or non-certified products
  - **6.2.2** Marine ingredients coming from the MarinTrust Improver Programme shall be clearly segregated, both during processing and during storage, from all certified MarinTrust and non-certified products

**Full compliance:** The applicant has a system in place that can effectively identify and segregate this type of marine ingredient from a fully certified MarinTrust marine ingredient or a non-certified product.

**6.3** The applicant shall have a traceability system in place that will allow them to demonstrate the traceability back to the accepted improver programme fishery and accepted MarinTrust factory that is handling the improver programme fishery material

**Full compliance:** The applicant has a system in place that can effectively trace this type of marine ingredient back to an accepted improver programme fishery and accepted MarinTrust factory

**6.4** The applicant shall not use any logo from the MarinTrust programme on any product that contains ANY marine ingredients produced from the MarinTrust improver programme fishery. They will only be allowed to use an agreed claim to this improver programme if the material is made solely of MarinTrust improver material

**Full compliance:** The products produced in the facility are correctly labelled and the MarinTrust logo is only used on products that can trace back to marine ingredients that are fully certified to the programme. If products contain MarinTrust improver product material, the MarinTrust Logo cannot be used on these products. However, if the material is made solely of MarinTrust improver material then a claim to this MarinTrust improver programme can be made as long as the facility gets prior approval by the MarinTrust Secretariat

Notes: If an applicant has fully certified MarinTrust material and they mix it with material from an approved IP, all the resulting product will become IP accepted and can no longer be claimed as fully MarinTrust certified.



# **Definitions**

#### Chain of Custody (FAO derived Definition):

The set of measures which is designed to guarantee that the fishmeal and fish oil product put on the market and bearing the MarinTrust logo is really a product of designated origin and coming from the certified factory concerned. These measures thus cover both the tracking/traceability of the product all along the processing, distribution and marketing chain, as well as the proper tracking of the documentation and control of the quantity concerned.3

**Agent:** The agent works on behalf of either the seller or the buyer and facilitates the transaction (sale or purchase). The agent does not take ownership and can be seen as an alternative to having inhouse sales or purchase employees, they typically get paid a percentage of the activity. No activity, no cost.

**Applicant:** A company or group of companies in the supply chain that has **formally** applied to meet the Chain of Custody Standard through the formal Application Form.

**Broker:** A broker brings the buyer and seller together and gets a commission from either party or both. He/she does not take ownership. If the broker takes ownership, he/she becomes a principal and is thus a trader. A broker needs a good understanding of the products and applications and needs to have a good network. He/she does not need to have money, as he/she does not need to finance the goods, as he/she does not take ownership.

**Certificate Holder:** A company in the supply chain that has been formally Certified by the Certification Body as complying with the MarinTrust Standard and/or the Chain of Custody standard requirements.

**Certification Bodies:** The bodies appointed by MarinTrust to audit, assess and monitor compliance of applicants and certificate holders under the MarinTrust Programme.

**Certified Claim:** A claim made by a certificate holder approved for use and licensed by the Standard Owner.

**Chain of Custody Standard:** The list of requirements that the Applicant must meet to claim Certification to the Chain of Custody Standard and /or use the Certified Claim.

**Key Data Element (KDE):** Data input required to successfully trace a product and/or its ingredients through all relevant CTEs.

**Marine ingredients:** Mainly fishmeal and fish oil derived from forage fish, but also marine organisms such as fish, krill, shellfish and algae

MarinTrust Branding: The name/s and logo/s as outlined in the MarinTrust Brand Guidelines

<sup>&</sup>lt;sup>3</sup> FAO Guidelines for the Ecolabelling of Fish and Fishery Products from Marine Capture Fisheries, Rome 2005 + 2009



MarinTrust Brand Guidelines: The brand guidelines of MarinTrust, as set out in MarinTrust Brand Guidelines Document.

**MarinTrust Certified Factory:** An applicant factory who have successfully been certified as compliant with the MarinTrust Standard requirements.

MarinTrust Chain of Custody (CoC) Certified: An Applicant company or group of companies who have successfully been certified as compliant with the MarinTrust Chain of Custody standard requirements.

**MarinTrust Statement:** A statement that accurately describes the User's certification under the MarinTrust Programme

**Potential Applicant:** A company or group of companies in the supply chain that are considering applying for Chain of Custody Standard certification.

**Stage:** A handling / transfer point in the supply chain e.g. Packing, Processing, Distribution, Sales.

**Trader:** Person or company that buys and sells products. The trader has legal ownership of products, receives invoices and issues invoices and receives the full package of paper documentation. A trader may touch the product (trader with warehouse/storage tank) or a trader may merely trade the product without physically receiving the product, as the product typically goes directly from the manufacturer to a manufacturing plant. The trader needs to; have a good network, understand the market, finance the purchase and sales of products and, be familiar with the international transport of goods in order to find the best and the cheapest means of transport.