



Guidelines for Certification Bodies managing
applications for certification to the
MarinTrust Programme

Document A2 – Version 3.0

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Introduction

This document provides guidance to registered Certification Bodies (CBs) for the management of applications for certification to the MarinTrust programme to ensure that all applicants and existing certificate holders are liaised with and handled in an efficient, professional, and consistent manner.

Please note that these guidelines relate to certification (or acceptance in case of the Improver Programme) against any of the following key components of the MarinTrust programme:

- Factory Standard
- Chain of Custody (CoC) Standard
- Improver Programme

And shall apply for the following category of applications:

- Initial
- Recertification
- Scope extensions

This process shall not be applicable for surveillance audits within a certification cycle (3 years). Surveillance audits shall be scheduled in accordance with the audit frequency and the application on file shall cover the full certification cycle, unless otherwise communicated by the submission of a scope extension or update.

Herein, we use the term “MarinTrust Standards” to refer to both the MarinTrust Standard and chain of custody Standard.

1.0 Pre-application

1.1 Self-assessment

All the standard requirements of the MarinTrust Programme shall be reviewed by the applicant/certificate holder prior to each audit with a view to identifying actual/potential non-conformances and initiating the appropriate corrective action. Conducting a self-assessment to each clause would be advisable.

The applicant/certificate holder shall ensure that all supporting evidence required for the submission of application for certification is available.

1.2 Enquiries

For the applicant or current certificate holders to decide on their preferred Certification Body (CB) of choice, CBs may receive enquiries for certification or acceptance (in the case of Improver Programme) to the MarinTrust programme prior to receiving an approved application form from the MarinTrust Secretariat.

An information pack within 2 weeks of receiving the enquiry shall be forwarded to the potential applicants by the Scheme manager, or delegated/responsible person, containing:

- Relevant application form
- Standard and programme requirements
- Scope of audit
- Time frames and estimated audit charges

These shall be discussed with the applicant or certificate holder by appropriately trained personnel that has full knowledge of the MarinTrust Programme.

1.3 MarinTrust Applicants/Certificate Holders

MarinTrust applicants are required to submit details of the whole fish fishery and by-product fishery assessment needs that are used in the process to ensure that they have an approved raw material for the production of compliant MarinTrust marine ingredients (such as fishmeal and fish oil). For further information on assessment pre-requisites, please refer to section 3.1 Evaluation of fishery assessment needs herein.

Applicants/certificate holders shall either have a valid Good Manufacturing Standard (GMP) Certificate in place which complies with the International Feed Ingredient Standard such as FEMAS, Chilean PAC or GMP+ or benchmarked equivalent as recognised by the MarinTrust Governing Body Committee (GBC). The applicant/certificate holder shall be able to demonstrate that they are legally licenced in the country of operation and comply with social and environmental requirements of the national regulatory authorities that oversee their operation.

These will be used to enable a pre-evaluation of the operation to be conducted by the CB's approved auditor before the planned date of the audit. If any are found not to be compliant, the applicant will be informed that these prerequisites shall be required if they are to be certified to the MarinTrust standard.

If the applicant/certificate holder does not hold a valid GMP Certificate, as outlined above, they shall be informed that they must complete the full manufacturing requirements section of the MarinTrust standard which shall add at least one additional day onto their audit time.

1.4 MarinTrust Chain of Custody Applicants and Certificate Holders

Applicants/certificate holders to the Chain of Custody (CoC) Standard, facilities 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. The facility shall be legally licensed in the country of operation. The applicant's facility shall provide evidence that they satisfy the minimum entry criteria for the scope under certification as outlined in the MarinTrust Chain of Custody Standard.

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. Please see the MarinTrust CoC Standard for further information.

The applicant/certificate holder shall be able to sell marine ingredient products as Improver Programme accepted, if the following conditions apply:

1. The site is formally listed as an Improver Programme Accepted Site on the MarinTrust website and
2. The facility wishing to sell the Improver Pro product holds MarinTrust Chain of Custody certification

Note:

Improver Programme material must be kept segregated from MarinTrust Certified material at all times in the case the facility wants to claim the final product as 'MarinTrust Certified'.

Where Improver Programme material is mixed with MarinTrust certified product, the product shall not be permitted to be claimed and/or sold as 'MarinTrust Certified', however, it may be claimed and/or sold as Improver Programme Accepted material.

2.0 Applications for certification

All applications for certification, or acceptance to the MarinTrust programme, shall initially be directed to the Operations Manager, or delegated/responsible person, within the MarinTrust Secretariat who shall conduct an initial review of the application form for review and approval.

Only approved applications received from the MarinTrust secretariat shall be processed. In the case that a completed application form is submitted to the Certification Body directly by an applicant or current certificate holder, the responsible personnel shall send the application form to the MarinTrust Operations Manager, or delegated/responsible person, within 24 hours to be processed and approved prior to proceeding with the application and certification process.

2.1 Initial review

On receipt of an approved application form from the MarinTrust Operations Manager, or delegated/responsible person, the CB's personnel shall conduct an initial review of the approved application obtained to establish and understand the factory audit and fishery assessment (for the MarinTrust Standard) requirements, and shall request any further clarifications, where necessary, from the MarinTrust Secretariat who shall where applicable liaise directly with the applicant or certificate holder for further information or clarification. These confirmations shall be reflected in the application form as applicable and shared with the CB.

For the review and processing of fishery assessment needs, fishery and by-product assessments shall be allocated in accordance with the '*Procedure for the monitoring and allocation of fishery and by-product assessments*'.

During the initial review, the CB shall ensure that the information obtained about the applicant or certificate holder is sufficient to the conduct the certification process.

Where necessary, the CB may contact the applicant/certificate holder or liaise with an appropriate member of the CBs audit team to clarify information to assist in the preparation of the audit plan and proposed audits costs.

2.2 Acceptance

Upon completion of the initial review, required clarifications and updated application form (where applicable), the CB shall accept and notify the applicant/certificate holder and MarinTrust Operations Manager, or delegated/responsible person, of the approval of application within 7 days.

Upon acceptance of application, the CB shall file the documents and update the applicant/certificate holder database using the information provided in the approved application form. At minimum, the information on the applicant database shall include:

- Name of the company
- Number and names of sites for audit
- The standard and version
- GMP+ or equivalent (as applicable)

The applicant/certificate holder shall be responsible for the collection and submission of all relevant information required. To aid this, there is a Data Gathering Guidance document for assessments which can be found by applicants on the MarinTrust website and evidence shall be submitted to the CB directly.

Where more detailed, scientific information directly related to the carrying out of the fishery and/or by-product assessment, in accordance with the current fishery and/or by-product assessment criteria, is required the CB shall be responsible for contacting the applicant directly, using the contact information included in the approved application form.

The CBs may take the opportunity during this process to explain and agree additional interpretation requirements of the fishery/by-product fishery assessment with the applicant or certificate holder.

The submission of a completed application shall act as a contract between the applicant/current certificate holder and Marine Ingredients Certifications Ltd confirming the applicant/certificate holder's commitment to y MarinTrust procedures and requirements as set out in the application form and Quality Management System (QMS). CBs shall also have legally binding contracts with their clients in accordance with ISO/IEC 17065 requirements.

3.0 Processing of approved applications

Upon acceptance of an application for certification, or acceptance in the case of Improver Programme, the CB Scheme Manager, or delegated/responsible person, shall contact the applicant/certificate holder within 5 working days to confirm acceptance of the application and that the applicant/certificate holder is able to proceed to audit by ensuring that they are:

- In possession of all the relevant Standard documentation to support their applications (such as legal status, GMP+ certification, etc.)
- Aware of and understand the relevant Standard prerequisites and clause requirements.
- Aware that the applicant/certificate holder shall enter a legally binding contract with the CB
- Able to provide the allocated auditor the necessary access to all areas required to be reviewed on the agreed audit date.

The CB Scheme Manager, or delegated/responsible person, may take the opportunity to clarify, explain, and agree additional interpretation requirements of the standard and next steps in the process with the applicant/certificate holder.

In the case of surveillance audits, these shall be scheduled in accordance with the audit frequency and the application on file shall cover the full certification cycle, unless otherwise communicated by the submission of a scope extension or update. However, the CB Scheme Manager, or delegated/responsible person, may wish to confirm with the certificate holder that there are no changes to the scope of the audit. In the case the is a confirmed changed, the Scheme Manager, or delegated/responsible person, shall instruct the certificate holder to submit the relevant scope extension/update to the MarinTrust Operations Manager, or delegated/responsible person.

3.1 Evaluation of fishery assessment needs

Approved raw material is a pre-requisite to the audit of the unit of certification (UoC) of the MarinTrust Standard which is the marine ingredient production facility. Prior to a factory audit, MarinTrust fishery and / or by-product assessments shall be coordinated and scheduled as follows:

Unassessed

For initial applications to the MarinTrust Standard, species noted as 'assessment required' shall undergo an initial fishery and/or by-product assessment prior to the scheduled audit date of the facility. For further information please refer to the '*Procedure for the monitoring and allocation of fishery and by-product assessments*' and document A3 – '*Conducting MarinTrust fishery and by-products assessments by registered CBs*'.

Where an applicant has selected a CB that does not provide fishery assessment services as their chosen CB, upon assessment determination of the allocated CB of 'approve' or 'do not approve' the

Operations Manager, or delegated/responsible person, shall notify the relevant CB of the approval determination.

Approved

Species noted as approved, fishery and/or by-product assessments shall be coordinated and allocated in line with document A12 - *Procedure for the monitoring and allocation of fishery and by-product assessments* and document A3 – *Conducting MarinTrust fishery and by-products assessments by registered CBs*.

Note: This is not applicable to the MarinTrust Chain of Custody Standard.

Proceeding to the scheduling of the audit

MarinTrust Standard

In the case an initial applicant has included one or more species that require initial assessment in the application form, all initial assessments shall be carried out prior to conducting the audit, however, the CB shall proceed with the planning and scheduling of the audit within a reasonable time frame by which assessment results will have been made to support with the efficiency of the process.

For both initial applicants and certificate holders undergoing recertification that include species that are all currently approved under the MarinTrust Programme, the CB shall proceed immediately to the scheduling of the audit.

In the case of current certificate holders only, where a new species has been added to the raw material scope as part of a scope extension application, the CB shall proceed with the planning and scheduling of the audit. The assessment result shall not be required prior to conducting the audit.

The CB Scheme Manager, or delegated/responsible person, shall ensure that the auditor is informed and shall be required to conduct a traceback exercise of the added species during next audit of the facility to verify that compliance of segregation requirements has been maintained.

Note: This shall not be applicable for Improver Programme Accepted Raw Material due to the higher risk to the integrity of the Programme. All Improver Programme Accepted Raw Material must gain acceptance status prior to the scheduling of the audit and/or addition to the current scope of certificate holders as part of a scope extension.

MarinTrust Chain of Custody

For applications for certification to MarinTrust Chain of Custody, fishery assessments are not a pre-requisite. Instead, the approved raw material source shall come from MarinTrust compliant material providers listed in the application form. Therefore, the CB shall proceed immediately to planning and scheduling of the audit.

3.2 Auditor allocation and audit scheduling

All auditor allocation and audits shall be coordinated and scheduled by the CB.

Upon acceptance of a MarinTrust application form and evaluation of fishery assessment needs as applicable, the Scheme Manager, or delegated/responsible person shall proceed to the allocation and scheduling of the audit as follows:

3.2.1. Allocation of auditor

The Scheme Manager, or delegated/responsible person, shall allocate an auditor to an approved MarinTrust auditor in accordance with document B3 – *Procedure for Appointment, Training, and Approval of Certification Body Personnel involved in the assessment, audit, and certification process* and ISO/IEC 17065 accreditation requirements. The audit shall be conducted in accordance with 17065 accreditation requirements and in line with document A4 – *‘Conducting MarinTrust Factory & Chain of Custody audits by Registered Certification Bodies’*.

Should an auditor conduct 3 consecutive audits at the same facility, the same auditor may not be used on the 4th audit without the express permission of the MarinTrust Secretariat.

3.2.2. Audit scheduling

The Scheme Manager, or delegated/responsible person, shall be responsible for scheduling audits and notifying the approved auditor. Where relevant, this schedule may be amended as necessary to consider changes in the audit frequency required by any amendments to the MarinTrust standards.

For initial audits, as part of an initial application, or scope extension for the addition of a new facility, scheduling shall be carried out as follows:

- shall be scheduled at a mutually convenient date following discussion with the applicant. The full audit to certification process shall be completed within no more than 1 year of the approved application being submitted)

For recertification audits, scheduling shall be carried out as follows:

- Shall be scheduled no less than 3 months prior to the current certificate expiry date following discussion with the certificate holder considering the requirements of the MarinTrust Programme.

For surveillance audits, scheduling shall be carried out as follows:

- Shall be scheduled no less than 1 month prior to the audit due date following discussion with the certificate holder considering the requirements of the MarinTrust Programme.

For all audits the Scheme Manager, or delegated /responsible person, shall confirm in writing to the applicant/certificate holder, and auditor should they not be the delegated responsible, the following information:

- Agreed audit date, time, and location,
- Audit schedule/agenda
- A controlled copy of the CB's own certification protocols and procedures for the MarinTrust Programme.

A copy of this information shall be held on the applicant/certificate holder's file.

Overseas travel arrangements including flights, hotels, and car hire, as required, shall be organised, and agreed by the CB in consultation with the applicant and the auditor prior to the allotted audit date.

3.2.3. Audit Frequency

Certificates for the MarinTrust Programme Standards, or acceptance in the case of the Improver programme, shall be valid for 3 years upon successful surveillance audit results. Certificate holders / accepted sites shall re-apply for certification or acceptance to the Programme 6 months prior to the expiry indicated on the of the certificate of conformity, or letter of approval for the Improver Programme.

Re-certification audits shall be arranged at least three months prior to certificate expiry date and shall be carried out to allow the new certification to be completed before the current certificate date expires. *Where practicable, re-certification of a site shall be carried out by the same auditor only up to a maximum of three consecutive audits.*

All surveillance audits and re-certification audits shall be conducted at the frequency defined by MarinTrust, which shall consist of the following, conducted within not more than 12 months of the previous audit:

- initial audit (year 1)
- 2 surveillance audits on an annual basis (years 2 and years 3)
- Recertification audit each conducted.

Where an audit cannot be conducted on the agreed date, the Scheme Manager, or delegated/responsible person, shall ensure that the audit is not re-scheduled outside the audit frequency detailed herein or expiry date as stated on the certificate of compliance.

Note: Under exceptional circumstances MarinTrust in consultation with the CB may invoke Process on Handling Remote & Enhanced Remote Factory and Chain of Custody Audits during Extraordinary events of Circumstances which shall take precedence over these audit frequencies. If this procedure is invoked by MarinTrust please refer to this procedure.

In some cases, where the marine ingredient, such as fish meal or fish oil, is not produced continuously, the re-certification audit shall take place whilst the factory is in production, and verification of corrective actions in relation to critical and major nonconformities shall take place within a period of time that the product is being manufactured.

In the event there are substantial changes to the premises or products, these shall be notified in writing to CB. The certificate may be withdrawn in the event changes occur, which shall affect the company's certification status.

Audit plan

The CB Scheme Manager, or delegated responsible person, and/or in conjunction with the allocated auditor, shall issue the audit plan, together with audit costs, to the applicant/certificate holder for agreement 2 weeks prior to the scheduled audit date, and shall be in accordance with 17065 accreditation requirements, taking into consideration the following, but not limited to, the risk factors identified below:

- Applicant/certificate holder size and technical resource:
 - Production Area
 - Employees
 - Product Lines
 - Production turnover
 - Subcontracting facilities
- Prior knowledge of the applicant/certification holder to the MarinTrust Programme.
- Recognised, relevant certifications to the MarinTrust Programme held

Once accepted, the invoice for the proposed audit work that will be required for Certification to the MarinTrust Programme shall be issued. Once payment is received from the applicant or certificate holder, the CB shall progress to planning and conducting of the audit. Please refer to Document A4 – *Procedure for registered certification bodies conducting audits against the MarinTrust Programme* for further information.

4.0 Certification Process

Upon completion of the application process, the certification process shall be carried out in accordance with ISO/IEC 17065 accreditation and MarinTrust Programme requirements as outlined in the QMS, which shall include:

- Conducting of Fishery and By-product assessments
- Planning and conducting of audits
- Issuing and Withdrawal of certificates
- Complaints and appeals process

5.0 Records

All MarinTrust application forms shall be kept in the applicant/certificate holders file for no less than 6 years which shall cover two certification cycles to support with the continuity of certification status which may require historic information.

In addition, the CB shall maintain a database for the managing of all applications under the MarinTrust Programme, which shall be shared with the MarinTrust Operations Manager, or delegated/responsible person on the first working day of each calendar month, which shall include, as a minimum, the following information:

- Applicant company name
- Applicant site name
- Audit type
- Allocated Auditor
- Audit conducted date
- Standard type
- Certificate number (for existing certificate holders)
- Certificate expiry date

AMENDMENT LOG

DATE	ISSUE	AMENDMENT	AUTHORISED BY
13/11/2015	1.1	IFFO RS logo heading, footer.	Francisco Aldon
27/11/2017	1.7	Update of wording throughout the document from “assessment” to “audit”.	Francisco Aldon
27/11/2017	1.7	Deletion of “Length of the On-site” has been deleted from point 6.0, second paragraph	Francisco Aldon
27/11/2017	1.7	Update of all of the levels of non-conformity in section 6.0, Audit procedures	Francisco Aldon
27/11/2017	1.7	Updating of section 8.0 Audit Frequency to ensure that it is clear the frequency and length of an audit is not on a risk based term.	Francisco Aldon
27/11/2017	1.7	Rewording of “21 working days” to “28 calendar days” I section 10.0 Non-conformance follow up.	Francisco Aldon
27/11/2017	1.7	Section 11.0, fifth paragraph, rewording of paragraph to “shall also be sent to the IFFO RS Standards Administrator and or IFFO RS secretariat with the same time period of no longer than 3 working days after the Certification Meeting. The Head of Operations shall use these audit reports for standard consistency monitoring purposes also.”	Francisco Aldon
27/11/2017	1.7	Section 11.0, final paragraph, change from “The applicant paying for the assessment shall be regard as the applicant” to ‘The main contact as indicated in the IFFO RS application form	Francisco Aldon
27/11/2017	1.7	Rewording of final paragraph in section 8.0 to “In some cases, where the marine ingredient is not produced continuously, the Re-certification audit shall take place while the factory is producing”	Francisco Aldon
Version 2 edits (MarinTrust conversion)			
01/10/2020	2.0	MarinTrust Header & Footer inserted	Libby Woodhatch
01/10/2020	2.0	Wording throughout document amended to read ‘ <i>MarinTrust Programme</i> ’	Libby Woodhatch
01/10/2020	2.0	Inclusion of paragraph 2 and 3 in the introduction.	Libby Woodhatch

01/10/2020	2.0	Inclusion of wording 'In the case that a completed application form is submitted to the Certification Body directly by an applicant, the appropriate staff member shall send the application form to the MarinTrust Secretariat within 24 hours to be processed and approved prior to proceeding with the application and certification process.' In section 2.0, first paragraph	Libby Woodhatch
01/10/2020	2.0	Further guidance added to the final 3 paragraphs of section 2.0 for preparation of audit.	Libby Woodhatch
01/10/2020	2.0	Inclusion of 'Prior to a factory audit, MarinTrust fishery and / or by-product assessments should be conducted to the latest version of the MarinTrust fishery assessment and by-product assessment procedures' in section 3.0, paragraph 1.	Libby Woodhatch
01/10/2020	2.0	Inclusion of '(within no more than 1 year of the application being submitted),' to section 3.0, paragraph 2.	Libby Woodhatch
01/10/2020	2.0	Inclusion of 'Should an auditor conduct 3 consecutive audits at the same site plant, the same auditor may not be used on the 4 th audit without the express permission of the MarinTrust Secretariat.' to section 3.0, paragraph 4	Libby Woodhatch
01/10/2020	2.0	Inclusion of 'The facility shall need to be able to demonstrate that they are legally licenced in the country of operation and comply with social and environmental requirements of the national regulatory authorities that oversee their operation.' in Section 5.1, paragraph 1.	Libby Woodhatch
01/10/2020	2.0	Addition of section 5.2 to include specific guidance on Chain of Custody	Libby Woodhatch
01/10/2020	2.0	Addition of section 5.3, Self-Assessment	Libby Woodhatch
01/10/2020	2.0	Amendments to section 6.0 to remove specific guidance of conducting the audit. This specific guidance is provided in	Libby Woodhatch

		appendix A4 – Conducting MarinTrust Factory and Chain of Custody Audits by Registered Certification Bodies’	
01/10/2020	2.0	Sections 7.0 – Notification of Serious Food Safety / Legality issues, 8.0 – Audit frequency, 9.0 – Initial Audit Reports, 10.0 Non-conformance follow-up and 11.0 – Distribution of Final Audit Report removed and included in appendix A4 – Conducting MarinTrust Factory and Chain of Custody Audits by Registered Certification Bodies’	Libby Woodhatch
01/10/2020	2.0	Removal of certificate specific information and inclusion of additional guidance in section 7.0 – Audit Certificates first paragraph ‘Please refer to document A5 – Issuing and Withdrawal of Certificates procedure, for details.’	Libby Woodhatch
01/10/2020	2.0	Inclusion of wording in section 8.0 – records, paragraph 1.	Libby Woodhatch
August 2022	3.0	Renumbering and reformatting of sections throughout the document for clarity and clear order of process requirements	Governing Body Committee
August 2022	3.0	Removal of “These reviews shall be part of the applicant’s /certificate holder’s own documentation and they shall conduct an internal audit review plan of all their policies and procedures at least every 12 months.” This will be captured in the standard requirements directly.	Governing Body Committee
August 2022	3.0	Update of information relating to enquiries, section 1.2.	Governing Body Committee
August 2022	3.0	Additional guidance to section 1.4 MarinTrust CoC applicants and certificate holders in relation to the use and claim of Improver Programme material	Governing Body Committee
August 2022	3.0	Addition of further information on the steps to be taken by the CB for initial review of the application (2.1), and the process for accepting applications upon completion of the review and receipts of any further clarification required (2.2).	Governing Body Committee

August 2022	3.0	Update of contractual wording, Section 2.2, to provide clarification that the MarinTrust application form shall act as a contract between the applicant/certificate holder with the scheme owner, and that the CB shall also have their own contract directly with the applicant/certificate holder.	Governing Body Committee
August 2022	3.0	Additional guidance for the processing of approved applications in Section 3 to include clear requirements and process for the fishery assessment aspect prior to audits, and the scheduling of audits. This includes updates and inclusion of further information for the allocation of auditors and audit scheduling.	Governing Body Committee
August 2022	3.0	Reintroduction of audit frequency herein, Section 3.2.3, previously moved to document A4 – conducting of MarinTrust audits and update of timeframes for each instance of initial, surveillance, and recertification audits.	Governing Body Committee
August 2022	3.0	Deletion of specific requirements for the certification process, section 4.0 and inclusion of reference to specific documents for detailed information on procedure requirements.	Governing Body Committee
August 2022	3.0	Update of record information, section 5.0, to ensure application forms records are stored for no less than 2 certification cycles and the information requirements of the main database to be held by CBs on applicant and certificate holders.	Governing Body Committee