



# Clients transferring certification from their current Certification Body to another

Document D3 – Version 2.0

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**Reviewed by:** Technical Assurance Committee

**Approved by:** Governing Body Committee

## 1. Purpose

This procedure defines the method that shall be adopted by the registered Certification Bodies (CB) by which an existing MarinTrust certificate holder can change from one MarinTrust registered CB to another.

## 2. Scope

An existing MarinTrust certificate holder may wish to change their chosen CB and this procedure shall allow this process to occur by setting out a methodology that will ensure that the MarinTrust client's certification is still credible, and the integrity of the MarinTrust Programme is not compromised.

Certificate holders may wish to transfer from their existing CB to another CB due to, but limited to, the following:

- A certificate holder with a valid MarinTrust Certificate wishes to move to another CB during the period of validity for their current MarinTrust Certificate.
- The existing CB's accreditation is withdrawn or voluntarily ceases to be accredited against the relevant standard under the MarinTrust Programme.
- The existing CB is to cease / has ceased trading.
- The existing CB has not attained accreditation from its Accreditation Body to include the relevant standards of the MarinTrust Programme.

This Procedure does not cover:

- whole fish and by-product fishery assessment cycles. These are separate to audit / certification cycles and will be managed in line with the appointment of fishery assessments procedure.
- Suspended certificate holders. See **Section 4**, Further information

If a CB is unsure what procedure to conduct, they should contact the MarinTrust Secretariat to discuss and approve the correct course of action.

### 3. Certification transfer procedure

All certification transfers shall be carried out as outlined below.

#### 3.1. Transfer request and approval

The certificate holder wishing to transfer from their existing CB to another shall:

1. Inform the MarinTrust Operations Manager, or delegated responsible person, in writing via letter or email, of their intention to transfer CB to another detailing:
  - Their existing CB
  - The CB they wish to transfer to
  - Their reason for wishing to transfer CB
  
2. Complete and submit the relevant scope extension to the MarinTrust Operations Manager or delegated responsible person and:
  - a. For recertification, the certificate holder has submitted the request **no less than 6 months prior** to their certificate expiry.
  - b. For surveillance, the certificate holder has submitted the request **no less than 3 months prior** to the next audit due date.

The MarinTrust Operations Manager, or delegated/responsible person, shall:

3. Review the request to verify:
  - c. The certificate holder has submitted the request in line with points **a and b**
  - d. All outstanding invoices, if applicable, have been settled with the existing CB. Where there are outstanding invoices the transfer process shall not proceed until the existing CB has confirmed directly with MarinTrust that all outstanding invoices have been settled.
  - e. The proposed new CB has the required approval credentials to conduct the MarinTrust certification services for the certificate holder.
4. Communicate the decision either to approve or decline the proposed transfer to the certificate holder within 5 working days from the receipt of the certificate holder's intent to transfer was submitted. Where the proposed transfer is declined the reasons shall be communicated to the certificate holder.
5. Review and approve the scope extension application form in line with *internal guidance for the approval of applications to the MarinTrust Programme*.

Where the proposed transfer is declined, the transfer request shall remain 'under review' until such a time all aspects have been successfully addressed. The reasons for declining shall be communicated to the certificate holder and the next steps required for the transfer to be approved.

Following approval of the transfer request the process for transferring from one CB to another shall be carried out as outlined in Section 3.2.

### 3.2. Notification of transfer

Upon approval of the scope extension application for the client to transfer CB, the Operations Manager, or delegated person responsible, shall:

1. inform the certificate holders existing CB of their client's intention to transfer to another CB and shall direct the CB to collate the certificate holder's certification file and despatch this to the new CB **within no more than 7 days** of the notification.
2. inform the certificate holders proposed new CB (succeeding CB) of their intention to transfer their valid MarinTrust Certificate in writing and share with them the approved application form in line with *internal guidance for the approval of applications to the MarinTrust Programme*.
3. request confirmation of the current certification audit history and upcoming audits dates
4. update the certificate holder's status on the MarinTrust website as 'CB transfer in progress' within 24 hours of approval.

The certificate holder's existing CB shall be required to despatch the certificate holder's certification file as follows to the new CB **within no more than 7 days** of the notification. This shall include, but not limited to, the following:

- The most recent application forms and supporting documents (e.g., GMP+ certification)
- The initial certification or most recent recertification audit reports, and the latest surveillance report
- NC conformance reports
- Certification decisions

On receipt of the certificate holder's file the succeeding CB shall:

5. Ensure that they receive sufficient information from the existing CB to take a decision on the transfer request.
6. Conduct a full technical review within 7 days and ensure that any conditions for certification to the MarinTrust standard are still adhered to, e.g., the schedule for annual surveillance audit from the time the certificate holder was first certified to the MarinTrust standard shall be complied with by the new CB. The new CB shall communicate any inconsistencies or queries to MarinTrust.

The technical review shall be conducted in alignment with IAF MD 2:2017, Transfer of Accredited Certification of Management Systems, and include at least:

- The initial certification or most recent recertification audit reports, and the latest surveillance report
- Status of outstanding non-conformities and corrective actions (if applicable)
- Appeals or complaints received (if applicable),
- Confirmation the certificate holder's activities are within their scope.

Following the technical review, the succeeding CB may wish to accept or decline the transfer request as outlined in Section 3.3.

### 3.3. Decision to accept or decline transfer request

Following the technical review, the succeeding CB may wish to accept or decline the transfer request and shall inform the MarinTrust Operations Manager, or delegated/responsible person, of the decision within 7 days of the decision as follows:

#### Decision to accept:

Where the decision is to accept the transfer, the succeeding CB shall take the following course of action:

- **The certificate holder is due a recertification audit:**  
Where the certificate holder is due a recertification audit at the time of the certificate transfer, and no risks have been identified during the technical review, the new CB shall:
  - update their database with the certificate holder's name and information.
  - schedule and conduct a recertification audit in line with the maintenance of certification continuity.
  
- **The certificate holder**
  - i. **requires a surveillance audit within less than 3 months of the time of transfer as part of the certificate cycle at the time of transfer, or**
  - ii. **risks are identified during the technical review:**  
The new CB shall withhold issuing a certificate of compliance until either:
    - i. a full surveillance audit has been successfully completed to the MarinTrust standard for those requiring a surveillance audit the time of transfer, or
    - ii. a full or partial audit has been successfully completed to address the risks identified during the technical review.
 The certificate holder shall remain certified with their existing CB who shall maintain the certificate validity for 3 months from the approval date of the transfer request.
  
- **The certificate holder**
  - i. **does not require a surveillance audit within less than 3 months at the time of transfer as part of the certificate cycle; or,**
  - ii. **no risks are identified during the technical review:**  
the new CB shall:
    - Issue their own certificate of compliance which states the same scope and period of certification as the pre-existing certificate for MarinTrust and the pre-existing certificate destroyed.
    - Update their database with the certificate holder's name and information.
    - Conduct the surveillance audit in line with the maintenance of certification cycle

**Note:** 7 days prior to the expiry of this 3-month transfer period the existing CB shall inform the MarinTrust Secretariat of the upcoming expiry. On the date of expiry of the transfer period the existing CB shall withdraw their certificate.

The Operations Manager, or responsible/delegated person, shall amend the details on the MarinTrust website/applicant database and change the name of the CB certifying the certificate holder and upload the new CB's Certificate within 24 hours of notification.

Following the completion of the transfer process the succeeding CB shall follow the certification cycle in line with document A4 – *Conducting of MarinTrust Factory & Chain of Custody audits by Registered Certification Bodies (CBs)*.

#### **Decision to decline:**

The succeeding CB may decide to decline the transfer for various reasons including, but not limited to, risks identified during the technical review are deemed to be too high for the new to CB to absorb.

Where the decision is to decline the transfer request the succeeding CB shall:

- a. inform both the client and MarinTrust within 7 days of the decision outlining the relevant justification and evidence
- b. discuss the certificate holders' options directly with the Operations Manager and Assurance Officer

the Operations Manager, with the support of the Assurance Officer, shall:

- c. coordinate with the existing CB following discussion of the certificate holders' options
- d. discuss the certificate holders' further options where applicable

Options that may be presented to the certificate holder shall be on a case-by-case basis. MarinTrust and each CB shall need to consider the following, but not limited to, aspects:

- Certification expiry and recertification dates
- Surveillance due dates
- Any extensions or variations already applied to the certificate holders certification
- Other

## **4. Further considerations**

Unless CB's accreditation is withdrawn or voluntary ceases to be accredited, suspended certificate holders **shall not** be allowed to transfer their certification to a new CB.

Where a CB accreditation is withdrawn or voluntarily ceases to be accredited (either in full or the accreditation scope for MarinTrust Standards) Certificate holders may chose if they wish to transfer to another CB. In such cases, the succeeding CB shall follow in accordance with IAF MD 2:2017, Transfer of Accredited Certification of Management Systems.

## 5. Records

Each CB involved in the transfer process shall keep records as follows:

The pre-existing CB shall keep records which shall include:

- Transfer approval letter
- Certification file sent to succeeding CB
- Notification of transfer period expiry (*if applicable*)
- Notification of withdrawal of certification
- Any information in relation to outstanding payments (where relevant)

The succeeding CB shall keep records which shall include:

- Transfer approval letter
- Certification file received from pre-existing CB
- Technical review
- Notification of transfer decision
- Audit report (*if applicable*)
- Certificate of Compliance (*if applicable*)

### AMENDMENT LOG

DATE	ISSUE	AMENDMENT	AUTHORISED BY
May 2015	1.0	Introduction of IFFO RS Ltd	Francisco Aldon
February 2016	1.2	Introduction of 'and the existing Certificate destroyed.' In 2.7.	Andrew Jackson
February 2023	2.0	MarinTrust Header and Footer inserted	Governing Body Committee
February 2023	2.0	References to IFFO RS updated to MarinTrust throughout	Governing Body Committee
February 2023	2.0	Renumbering of sections to accommodate addition of process information	Governing Body Committee
February 2023	2.0	Addition of clear guidance for the transfer request and approval process, Section 3.1.	Governing Body Committee
February 2023	2.0	Addition of clear guidance for the notification of a transfer request process, Section 3.2.	Governing Body Committee
February 2023	2.0	Addition of clear guidance for process of deciding to accept or decline a transfer request, Section 3.3.	Governing Body Committee
February 2023	2.0	Updated "Approved CB" to "registered CB" throughout	Governing Body Committee
February 2023	2.0	Addition of further considerations, Section 4., and records, Section 5.	Governing Body Committee