



MarinTrust

Guidance for 60-day public consultation

V3 By-Product assessment criteria & methodology

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1. About this document

This document provides information for the public consultation stage of the development of Draft V3 MarinTrust By-Product Assessment. It includes:

- An overview of the development process.
- An explanation about the Draft V3 and key changes.
- An overview of the public consultation process and provision of feedback.

2. Revision of standards

To ensure that the MarinTrust Programme remains relevant and fit for purpose, standards and other core program documents must be reviewed and revised on a regular basis and in accordance with the ISEAL Standard-Setting Code¹ and ISO/IEC 17065:2012².

3. Responsible raw material sourcing

The **MarinTrust Factory Standard certifies the marine ingredients production facility (factory)**, delivering assurance that the raw materials used to make fishmeal and fish oil are responsibly sourced. As an essential **prerequisite to the factory audit**, facilities must demonstrate that they source approved raw materials (whole fish or by-products, such as trimmings and offcuts) that are:

1. Not from IUU fishing activity,
2. Not an endangered species, and
3. For whole fish, from responsibly managed fisheries aligned to the FAO Code of Conduct for Responsible Fisheries.

By-products³, such as trimmings or offcuts, are invaluable raw materials and are increasingly used to make fishmeal and fish oil. The FAO⁴ identifies that between 30-35% of fish is lost or wasted post-harvest. MarinTrust wants to reduce the loss of this valuable resource by encouraging the use of by-products.

¹ ISEAL Standard-Setting Code of Good Practice Version 6.0

² ISO/IEC 17065:2012. Conformity assessment — Requirements for bodies certifying products, processes and services

³ For the purposes of the MarinTrust by-product assessment, by-products are defined as: The offcuts or trimmings such as the heads, guts, bones etc. of marine species, such as fish, that were originally directed for human consumption. And for when whole fish are determined no longer suitable for direct human consumption due to proven, unintentional spoilage.

⁴ FAO. 2020. The State of World Fisheries and Aquaculture 2020. Sustainability in action. Rome. <https://doi.org/10.4060/ca9229en>

To demonstrate responsible sourcing, a MarinTrust certified facility can only⁵ use raw material (whole fish and by-products) that is MarinTrust approved, which means it has passed an assessment undertaken by the third-party Certification Body.

MarinTrust sets the criteria and assessment methodology to assess these raw materials (the documents in this consultation). Approval can also be demonstrated through sourcing from MarinTrust recognised equivalence. The Marine Stewardship Council (MSC) Fisheries Standard and MSC Chain of Custody, are recognised by MarinTrust; MSC-certified fishery sources automatically receive approval (through the MarinTrust MSC verification tool).

4. The development of V3

The MarinTrust assessment criteria and methodology were first developed in 2009, and version 2 (V2) was released in 2017. In line with the [Terms of Reference](#) for the development of V3 of MarinTrust Standard, MarinTrust has been improving the by-product assessment, with the objective to:

- strengthen the approval criteria for by-products in line with the Standard,
- reformat the by-product criteria and methodology, and
- develop an IUU risk assessment for by-products.

A comprehensive review of the V2 by-product assessment started in late 2019 and has been guided by the [Fisheries Development Oversight Committee](#) (FDOC), an independently chaired MarinTrust governance committee. Various iterations have been trialled and revised during the development process.

- A workshop with certificate holders was held in January 2022 to both learn what challenges there are with the current by-product assessment and to test proposed changes with this group of affected stakeholders.
- In developing an IUU risk assessment for by-products, MarinTrust commissioned an independent review of different IUU risk methodologies and with the technical advice from the FDOC and other experts, identified a set of indicators and tools that can be used to identify country IUU risk.
- Two rounds of pilot testing (December 2022 and April 2023) have been completed by certification body fishery assessors. Pilots enable checks on whether the criteria are easy to implement, consistent outcomes are achieved, and the methodology is auditable.

⁵ Certified facilities can source whole fish and by-products that are not MarinTrust approved but these are excluded from the scope of MarinTrust certification and must be kept fully segregated from approved whole fish and by-products.

4.1 Challenges identified with by-product assessment

By-products come from human consumption sources, often in smaller volumes and from many different locations. They also often come from processing facilities that are two or more steps removed from the fishery source in the supply chain.

V2 is dependent on the information available at a fishery level, such as stock status, gear selectivity, etc. It is not always possible or practical for factories to get detailed information on the fish species stock status, or other data that is available at the fishery level.

Reflecting on these challenges, and to improve accessibility MarinTrust needed to review the practicality of requesting stock information for by-product assessments. As this limits the flexibility for sourcing by-products and adds to the costs of assessment for a facility.

5. Main changes in V3

This section provides an overview of the main changes between V2 and Draft V3. The proposed revisions to V3 aim to address the challenges with the current assessment process and re-focus the intent of by-product assessment.

Intent: By-product species and are not endangered species do not come from IUU fishing activity.

This has resulted in major changes to the criteria and methodology. V2 focused the assessment on stock-specific criteria, assessing species vulnerability. Draft V3 focuses on the **legality of the by-product sourced within the supply chain**, this is done by using an **IUU risk-based assessment of the source country (flag state)**. In V3 the checks to ensure the **species is not endangered** (CITES appendices & IUCN Red List for threatened species) remain.

A strong link back to the MarinTrust Standard and factory audit is now included, to ensure there are additional checks on supplier agreements during the audit to ensure raw materials are not from IUU fishing activity.

5.1 Key changes

The Draft V3 has a three-step methodology and is focused on a country-based IUU risk assessment (see Table 1 comparing V2 and Draft V3).

In addition, across Draft V3 several general improvements have been made including the removal of duplication, improved wording/clarity, consistency in terminology and improved auditability of each clause.

Appendix 1 provides a more detailed summary of the proposed Draft V3. A full draft of the criteria, methodology and guidance is made public to support this consultation.

Table 1: V2 and V3 comparison

V2 assessment criteria	Draft V3 assessment criteria
Review the stock assessments, the legality of the fishery and that the fishery does not contradict scientific advice. <ul style="list-style-type: none"> • Category C species stock status review • Category D species Productivity Susceptibility Assessment (PSA) 	Step 1. CITES and IUCN red list check
	Step 2. IUU risk assessment – IUU Fishing Index
	Step 3. Management framework assessment <ul style="list-style-type: none"> • 3.1. There is a management system/ governance in place in the country from which the by-products are sourced. • 3.2. There is monitoring through a regime which may include at sea and portside inspections, observer programmes, and VMS.

6. Overview of the public consultation process

Draft standards are required to be published for a 60-day public consultation period to enable all stakeholders to provide feedback about the standard, the individual clauses, the relevant supporting information etc. This is an invaluable part of the development process, ensuring V3 is credible and fit for purpose.

6.1 Access to content for the public consultation

Go to the [public consultation](#) page of the MarinTrust website to download the relevant materials. These are all MS Excel files and are listed in Table 2.

Table 2: List of files for V3 public consultation

	Filename	Location of all files
1	MarinTrust DRAFT V3 by-product assessment – public consultation guide (this document)	https://www.marin-trust.com/public-consultations
2	MarinTrust DRAFT V3 by-product assessment – full draft PDF	

3	MarinTrust DRAFT V3 raw material sourcing – Excel clauses for public consultation (whole fish & by-product feedback)	
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The Excel file is structured with an introduction page to explain the file and separate sections for feedback on the by-product and whole fish fishery assessment criteria.

The ‘MarinTrust DRAFT V3 raw material sourcing – Excel clauses for public consultation’ document contains detailed clauses and space to provide comments/feedback. It is advisable to read the ‘by-product assessment – full draft PDF’ document first, followed by the supporting documents.

6.2 Requirements for responses

To ensure fairness in the consultation process it is important to have consistent principles in place.

- Responses are required to have the full contact information – anonymous or incomplete spreadsheets will not be accepted.
- Responses received after the published deadline will not be accepted.
- As the principal language of the Standard is English, documents are in English. We are able to accept responses in English and Spanish. However, if you require further support to engage in this consultation please contact standards@marin-trust.com and we will do our best to accommodate your request.
- Submissions must be made using only the two ways provided (see Section 6.3).

6.3 How to respond

There are two ways to respond:

1. Survey: read the information and answer a set of comprehensive questions to provide your general views about the Draft V3.
2. Detailed feedback using the Excel file which contains the clauses and section for feedback for each clause. When completed this must be sent to standards@marin-trust.com by the deadline published on the MarinTrust webpage.

7. Next steps

Following the closing date of the public consultation, all comments and feedback will be collated by the MarinTrust team. Initial analysis will be undertaken including identifying common trends or issues and new suggestions.

The feedback from the public consultation will be reviewed by the relevant governance committee within MarinTrust. Their advice will be sought on how to respond to each area of feedback. The GBC will review the respective committee's proposals and agree to the final content of V3.0. This is expected in Quarter 4 (October-December), 2023.

Feedback from public consultation and the MarinTrust response must be published. This will be available on the MarinTrust website in due course. No personal information from any responses will be published, however, details of an organisation's name and/or sector will be included.

Appendix 1

A further, and more detailed, summary of changes between V2 and V3 of the MarinTrust by-product assessment criteria is provided in this section. The by-product assessment follows step-wise methodology (see Figure 2).

Pre-requisites for the MarinTrust by-product assessment

- By-products must come from fish intended for human consumption.
- By-products are from wild capture fisheries.⁶
- By-products cannot be marine mammals, amphibians, reptiles, or birds.

Table 3: Step 1 – CITES & IUCN Red List check

Intent:	MarinTrust certified marine ingredients are not from species that are at a high risk of extinction.
Outcome:	Exclude species that are at a high risk of extinction or subject to trade bans.
Criteria:	Not on CITES Appendix 1 or 2 Not IUCN red list category Endangered (EN) or Critically Endangered (CR)

⁶ By-products from aquaculture sources are not required to be assessed using this methodology

Methodology:	The assessor reviews CITES and IUCN red list categories to ensure the species under assessment is not on the CITES Appendix 1 and 2 list and is not listed as Endangered or Critically Endangered on the IUCN red list of threatened species. If the species is not EN or CR, and the IUCN assessment was completed more than 5 years ago, the assessor completes an additional check to ensure the species is not vulnerable to extinction.
Improvements in V3	The intent remains the same as V2, but improvements to structure and assessment flow have been made. Changes to the checks include incorporating CITES appendix 2 (no illegally traded species) and additional steps for when the IUCN assessment is older than 5 years, providing additional due diligence for this step.

[Figure 1](#) presents a decision tree to support assessors in completing Step 1, and

Table 4: Step 2 and Step 3 – IUU Risk Assessment & additional checks on the Management Framework

Intent:	Eradicate IUU fishery products are being used as raw materials for MarinTrust certified marine ingredients.
Outcome:	Exclude by-product species from countries that have a high risk of IUU fishing activity.
Criteria:	The flag state (country under assessment) is not listed by the IUU Fishing Index as having a risk of IUU fishing activity (step 2). If there is a risk, the flag state has the appropriate measures in place to mitigate the risk of IUU fishing (step 3).
Methodology:	Step 2: Assessor reviews key indicators in the IUU Fishing Index to identify if the country under assessment has a low, medium, or high risk of IUU fishing activity. If the risk is identified as low, the CB can Approve the by-product. If the risk is identified as medium or high, additional checks are completed by the assessor in Step 3. Step 3: The assessor completes a review of the fishery management framework of the relevant country using a set of pre-determined indicators. Should the risk remain medium following this assessment, then the by-product can be Approved 'Source with Caution', and additional checks during the factory audit will be required. The factory auditor will review the supplier agreement as per V3 Standard. If the risk is not reduced by the measures in place in the country and remains high risk, the by-product must not be sourced, and the CB will Not Approve the by-product.

Improvements in V3

The intent of V3 has moved to a country IUU risk assessment. No longer assessing the individual by-product species vulnerability to fishing impacts by the Category C and Category D assessment. IUU risk assessment introduces checks for country-level IUU Risk using credible external sources (IUU Fishing Index – Step 2) and indicators to provide evidence of an effective fisheries management system in the country (step 3). Importantly, there is a stronger link to the MarinTrust Standard and the factory audit should any risk of IUU be identified.

Figure 2 presents a decision tree to support assessors in completing Steps 2 and 3, the IUU risk assessment.

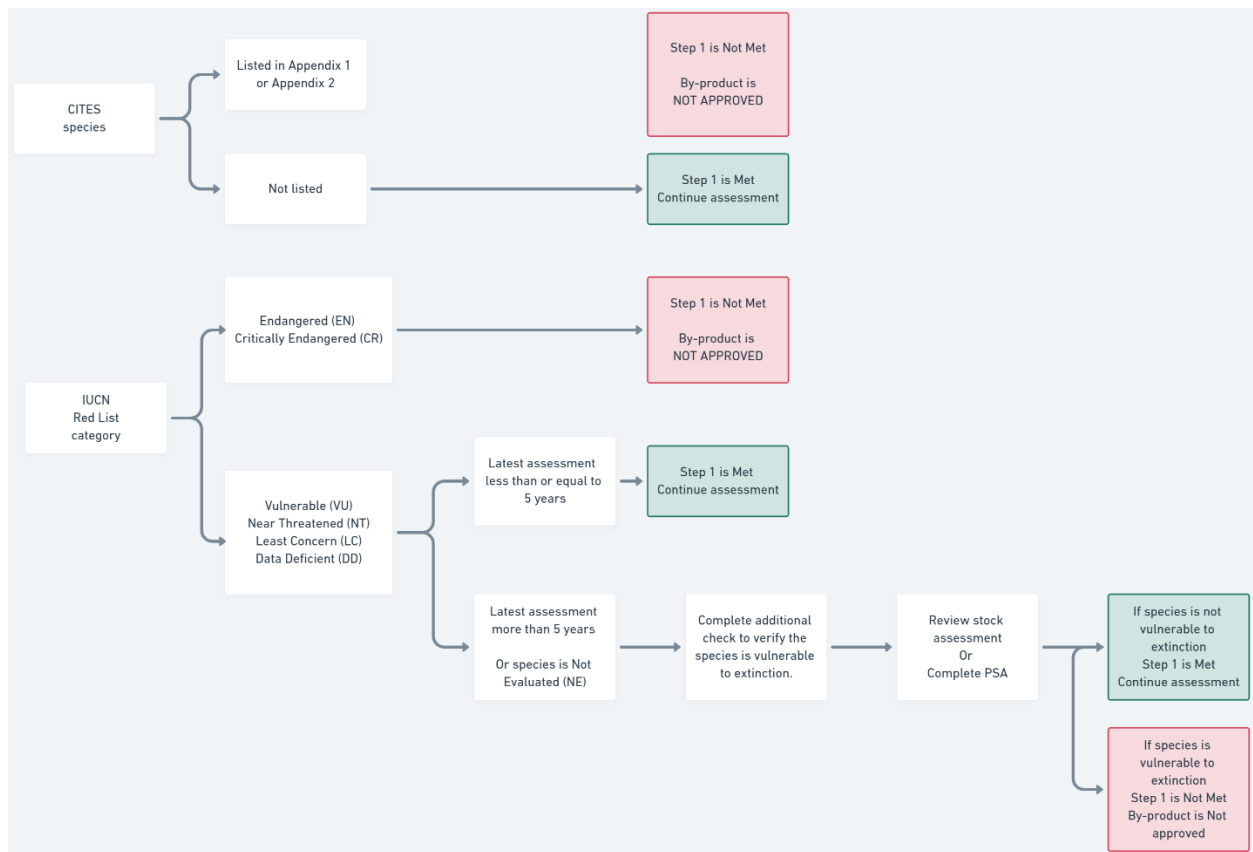


Figure 1: Decision tree to support completing Step 1 CITES and IUCN Red List check.

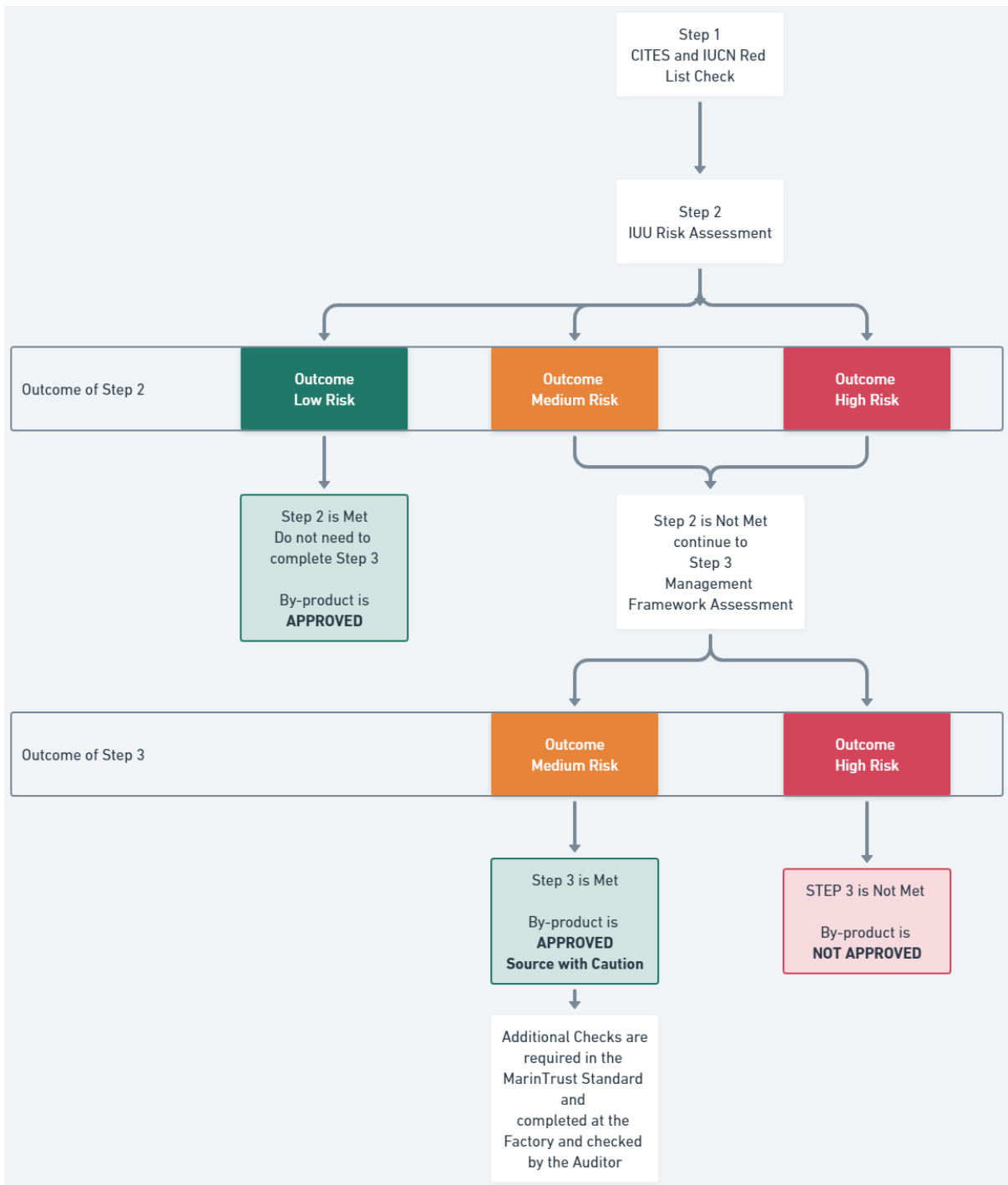


Figure 2: Decision tree to support completing Step 2 and Step 3, IUU risk assessment and checks of the country management framework.