



MarinTrust DRAFT V3
factory standard
Public consultation guide
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1. About MarinTrust

Vision

All marine ingredients produced globally will be sourced from responsibly sourced fisheries products and produced in a safe manner.

Mission

To enable marine ingredient producers to demonstrate to all stakeholders their commitment to responsible practices in the areas of raw material procurement and food/feed safety.

MarinTrust Global Standard

The MarinTrust Global Standard (MarinTrust Standard) and Certification Programme for the Responsible Supply of Fishmeal and Fish Oil was developed with international consultation with stakeholders and meets global best practice guidelines for certification and ecolabelling programs.

The MarinTrust standard has been in existence since 2009 and is now on Version 2 Revision 0. The objectives of the V2.0 standard as set by the Governing Body Committee were to:

- Eradicate Illegal, Unreported and Unregulated (IUU) fishery products being used as raw material for MarinTrust compliant marine ingredients (ex. fishmeal and fish oil).
- Ensure that whole fish used in the production of marine ingredients is sourced from responsibly managed fisheries.
- Ensure the safe manufacture of marine ingredients.
- Have effective traceability systems in place to ensure that the MarinTrust compliant marine ingredients can be traced back to the approved MarinTrust raw material fishery.
- Fish by-products (or trimmings) used in the production of MarinTrust compliant marine ingredients must not come from fish species that are classified as endangered or critically endangered in the International Union for Conservation of Nature (IUCN) Red list, that are listed in the Convention on International Trade in Endangered Species (CITES) and must be derived from fish intended for direct human consumption.
- Certified factories must commit to having environmental and social policies in place.

2. About this document

This document provides information for the public consultation stage of the development of Draft V3.0. It provides:

- A summary of the terms of reference for V3.0.
- An overview of the development process.
- An explanation about the Draft V3.0 and key changes.
- An overview of the public consultation process and provision of feedback.

3. Revision of standards

To ensure that the MarinTrust Programme remains relevant and fit for purpose, it must be reviewed and revised on a regular basis and in accordance with the ISEAL Standard Setting Code¹ and ISO/IEC 17065:2012². A review every five years is required.

3.1 Terms of reference for V3.0

In April 2018 the MarinTrust Governing Body Committee (GBC) ratified a proposal to review and enhance the standard towards Version 2 Revision 1, with enhanced strategic objectives. However, the changes and revisions proposed for the standard were more significant than simple revisions, and as a result it was agreed this should be developed as V3.0.

Detailed ToR for V3.0 were approved by the GBC on 13 October 2020. The ToR were submitted for a 30-day public consultation, starting on 12 November 2020.

A full copy of the final ToR is available from the [MarinTrust website](#).

The enhanced key objectives for V3.0 were agreed as:

- To continue to meet the objectives set in the development of Version 2.0 of the MarinTrust standard.
- To enhance and strengthen the MarinTrust Fisheries Approval Criteria for raw materials (whole fish and by-products) used for the production of compliant marine ingredients to promote more robust responsible fishery management.
- To enhance the traceability criteria to provide assurance to the traceability and integrity of the compliant marine ingredient.

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

- To enhance the MarinTrust Good Manufacturing Practices Criteria by taking into consideration good manufacturing practices for production that is intended for human consumption to ensure that marine ingredients are produced utilising relevant and robust practices for food safety.
- To promote more efficient marine ingredients production practices to reduce the environmental impact of the marine ingredients manufacturing process.
- To promote and create improved social and welfare benefits for all workers employed within the marine ingredients manufacturing sector.
- To evaluate extending the scope to include human rights criteria for vessels supplying whole fish to the marine ingredients manufacturing sector.
- To ensure that MarinTrust Version 3 remains relevant, robust, and fit for purpose.

4. The development of V3.0

The development process for V3.0 has progressed over a two-year period involving several stages (Figure 1).

Figure 1: The V3.0 development process



Throughout the development process, there has been a significant input from a wide range of stakeholders including:

- *Industry*: marine ingredient producers and feed manufacturers who provided the perspectives on the commercial application and consideration. In addition, a

number of factories across the world were involved in testing and piloting every clause.

- **Certification:** other standard holders and certification bodies providing feedback on areas of synergy, auditability.
- **Governance committees:** the various MarinTrust governance committees have been instrumental in reviewing and agreeing proposed clauses, providing expert input at all stages. Details of [governance committees](#) can be found on the MarinTrust website.

The final draft of the V3.0 clauses was reviewed by the GBC in April 2023, who agreed to proceed to public consultation.

5. Main changes in V3.0

This section provides an overview of the main changes between V2.0 and V3.0. The existing V2.0 Standard was used as a basis for the development of V3.0.

5.1.1 Structure

V3.0 is largely familiar to V2.0, however the flow and content of the standard has been significantly changed by separating and/or combining sections where applicable. Table 1 shows that V2.0 has seven sections, V3.0 has eight.

Table 1: The change in structure/sections

v 2.0 Section	v 3.0 equivalent section	V3.0 Section number
1. Responsible sourcing practices	Pre-requisites for sourcing	Section 1
	Responsible raw material sourcing practices	Section 3
2. Responsible traceability practices	Traceability	Section 4
3. Responsible manufacturing practices	Quality management system	Section 2
	Good manufacturing practice	Section 5
4. By-products	Responsible raw material sourcing practices	Moved to section 3
5. Social	Social Community engagement	Section 7
6. Environmental	Environmental	Section 8
7. Community engagement		Moved to section 7
n/a	NEW Staff training and key representative responsibilities	Section 6

5.1.2 Sections in V3.0

The eight sections in V3.0 cover many of the same requirements as V2.0. A summary of each section is included in Table 2.

Table 2: Overview of each section in V3.0

Section number	Section title	Scope and intent of the section
1	Sourcing pre-requisites	Includes the requirements for sourcing whole fish and by-products. As a pre-requisite these raw materials must be assessed, and assurance in place regarding the legality of sourcing.
2	Quality management system	Details what should be covered within a facility quality management system, including policies, procedures and other requirements.
3	Responsible raw material sourcing practices	Details the specific information and requirements to ensure the raw materials which are sourced, can be verified as to their origin, including fishery, by-product supplier, and farm. Includes the information and assurance required for each type of raw material.
4	Responsible traceability practices	Details the specifics for traceability of MarinTrust compliant marine ingredients, including requirements for segregation from non-approved sources. Also how compliant raw materials should be able to be traced through the production process, from source to final production, and sale to customer. Includes the requirement for mass balance to verify input and outputs.
5	Good manufacturing practices (GMP)	Focuses on the key requirements for a facility to ensure good manufacturing practices are in place, across all the key areas of the facility. Covers numerous specific requirements including hazard analysis, risk management, and operational details.
6	Staff training and competence	Ensures that staff have the required skills to understand and deliver across all areas of the MarinTrust standard.
7	Social accountability and community	Ensures effective staff safety, welfare and working conditions. Ensures good community relations and engagement.
8	Environmental accountability	Ensures effective environmental management and that the facility is in line with permits and managing environmental performance.

5.1.3 Changes to clauses

The rationale for changing and updating clauses depends on several factors including:

- *Regulations / policy*: what new requirements are in place from specific regulations, standards, international codes etc.

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- *Market expectations:* Addressing the requirements of the wider market notably buyers of marine ingredients.
- *Technical requirements:* changes in what constitutes good or best practice.
- *Societal considerations:* how the Standard keeps pace with expectations of NGOs and consumers.
- *Commercial considerations:* feedback on issues with clauses in V2.0 including from factories and auditors, and how marine ingredient producers can put new measures in place and achieve the levels required for certification.

Across each section of V3.0, general improvements have been made including removal of duplication, improved wording/clarity, consistency in terminology and improving auditability of each clause.

Various iterations of clauses have been produced, tested, and revised over the development period. Changes to clauses were made after each development stage to ensure they reflected the latest findings and feedback. Table 3 provides an overview of each section and the main changes within each.

Table 3: Main changes within each section in V3.0

Section number	Section title	Main changes
1	Sourcing pre-requisites	<ul style="list-style-type: none"> • Simplified the pre-requisite section. • Linked to the pre-assessment requirements for whole fish and by-products.
2	Quality management system	<ul style="list-style-type: none"> • Consolidated policies into one clause. • Introduced the need to provide metrics each year (by completion of a template) • Introduced the requirement for vessels supplying whole fish to have a social policy. • Greater emphasis on due diligence • Strengthened checks of suppliers and subcontractors as a foundation of due diligence by introducing requirements for traceability, legality, social policies, information provision etc. • Improved clarification around the use of logo and Improver Programme claim.
3	Responsible raw material sourcing practices	<ul style="list-style-type: none"> • Introduced applicable Key Data Elements (KDEs) from Global Dialogues on Seafood Traceability (GDST). • Clarified types of by-products and sources. • Linked to the updated by-product assessment methodology, a pre-requisite of the factory standard. Provided clarification for by-products rated as medium or high risk. • Strengthened the traceability requirements applicable by type of raw material.

4	Responsible traceability practices	<ul style="list-style-type: none"> • Aligned to MarinTrust Chain of Custody V2 to facilitate linkage between both Standards. • Introduced Key Data Elements (KDEs) from GDST. • Linked to raw material requirements in Section 3 to specify traceability requirements for each batch / delivery of marine ingredients. • Clearer and more robust traceability requirements at all stages of production.
5	Good manufacturing practices (GMP)	<ul style="list-style-type: none"> • All GMP requirements are now in this section. • Strengthened requirements to align with updates in good practice. • Aligned to latest versions of Codex Alimentarius - General principles of Food Hygiene (2020), ISO 22000 (2018), GMP+ (2022), FEMAS (2019). • Now in line with HACCP requirements and terminology. • New requirements for TACCP / VACCP (only for facilities producing human consumption) to improve product integrity.
6	Staff training and competence	<ul style="list-style-type: none"> • New section to ensure knowledge transfer/skills development around MarinTrust requirements. • Requirement for procedures provides flexibility for plants to implement their own ways of proving staff training and development.
7	Social accountability and community	<ul style="list-style-type: none"> • This section been brought up to date and in line with International Labour Organisation (ILO) and latest practice • Clearer requirements to demonstrate social performance in factories, balanced against what is possible. • Proposed a risk assessment approach to simplify some auditing requirements for certain clauses relating to legal compliance. • Community requirements simplified and updated.
8	Environmental accountability	<ul style="list-style-type: none"> • This section has been simplified but remains largely unchanged.

5.2 The V3.0 draft for public consultation

The V3.0 for public consultation consists only of the eight sections, subsections and draft clauses in each section. These are listed in an MS excel file called “MarinTrust DRAFT V3 factory standard – Excel clauses for public consultation”.

In “MarinTrust DRAFT V3 factory standard – Excel clauses for public consultation” there are:

- Eight sections, each with subsections and clauses.
- An indication where supporting templates and guides are available (see Section 5.2.1).
- A column for providing feedback for each clause.

- A sheet for feedback including about templates, guides and general comments.

The “MarinTrust DRAFT V3 factory standard – Excel clauses for public consultation” does not include an introduction, relevant annexes, detailed guidance, or interpretation for each clause. These will be developed after the V3.0 clauses are finalised.

5.2.1 Supporting templates and guides

To accompany the main V3.0 standard, a series of guides and templates have been developed (Table 4) to support factories and auditors. These provide more information for specific requirements, some of which are new.

Table 4: List of guides / templates to accompany the V3.0 standard.

Section number	Name of associated guide / template	Purpose / requirement
2	MarinTrust DRAFT V3 factory standard – Metrics template	The submission of annual performance metrics or indicators by the facility. It includes essential and voluntary metrics for social and environmental responsibility. This must be completed each year.
2	MarinTrust DRAFT V3 factory standard – Supplier and subcontractor approval guidance	An overview of the main requirements for the approval of suppliers and subcontractors. It also includes what should be in place with suppliers and subcontractors.
3	MarinTrust DRAFT V3 factory standard – Risk assessment guidance whole fish vessels	An overview of the main requirements for social responsibility for vessels supplying wholefish to marine ingredient producers. It provides an initial indication of risk at country level. Depending on the level of risk and type of vessel ownership, it specifies the requirements for additional assurance from the wholefish suppliers i.e. the vessels. These are in the form of supplier agreements and inclusion of statements that the vessel has in place for all its workers, effective social practice and human rights.
4	MarinTrust DRAFT V3 factory standard – Traceability exercise template	This template provides basic information for conducting a traceability verification test, showing the information that should be included. It provides facilities with a set of common criteria, to perform and evaluate a traceability verification test.
4	MarinTrust DRAFT V3 factory standard – Mass balance template	This template includes guidance on the collection and provision of information for the MarinTrust Mass Balance/Volume Reconciliation Exercise. It includes the key steps at which data should be provided.

5	MarinTrust DRAFT V3 factory standard – Marine ingredients for human consumption guide	This guidance provides an overview of the criteria if the applicant produces marine ingredients for human consumption.
5	MarinTrust DRAFT V3 factory standard – TACCP and VACCP template	This template is for the submission of Threat Assessment and Critical Control Points (TACCP) and Vulnerability Assessment and Critical Control Points (VACCP) assessments by the facility. It is only necessary for facilities that produce marine ingredients for direct human consumption.
7	MarinTrust DRAFT V3 factory standard – Factory social risk assessment guidance	This guidance provides an overview of the risk assessment approach for social responsibility in the factory. It provides an initial indication of risk at country level. The resultant level of risk will dictate the level of evidence required to be witnessed by the factory auditor.

6. Overview of the public consultation process

Draft standards are required to be published for a 60-day public consultation period to enable any and all stakeholders to provide feedback about the standard, the individual clauses, and the relevant supporting information etc. This is an invaluable part of the development process as it ensures V3.0 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 listed in Table 5.

Table 5: List of files for V3.0 public consultation

	Filename	Location of all files
Draft V3.0 clauses	MarinTrust DRAFT V3 factory standard – Excel clauses for public consultation	www.marin-trust.com/public-consultations
V3.0 supporting documents	MarinTrust DRAFT V3 factory standard – Metrics template	
	MarinTrust DRAFT V3 factory standard – Supplier and subcontractor approval guidance	
	MarinTrust DRAFT V3 factory standard – Risk assessment guidance whole fish vessels	
	MarinTrust DRAFT V3 factory standard – Traceability exercise template	
	MarinTrust DRAFT V3 factory standard – Mass balance template	

MarinTrust DRAFT V3 factory standard – Marine ingredients for human consumption guide	
MarinTrust DRAFT V3 factory standard – TACCP and VACCP template	
MarinTrust DRAFT V3 factory standard – Factory social risk assessment guidance	

Each excel file is structured in a similar format:

- An introduction page to explain the content of the file.
- The specific contents related to the file / subject, which may be in one or more worksheets.

The ‘MarinTrust DRAFT V3 factory standard – Excel clauses for public consultation document’ contains the detailed clauses and space to provide comments/feedback. It is advisable to read the ‘MarinTrust DRAFT V3 factory standard – Excel clauses for public consultation’ 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 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 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 V3.0 standard.
2. Detailed feedback using the excel file which contains the clauses and section for feedback for each clause. A sheet is also included for general comments, including about any of the templates or guidance notes provided. When completed this excel file 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 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 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.