



Global Standard for the Responsible Supply of Marine Ingredients Version 3.0

Feedback from 60-day

public consultation

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About MarinTrust

Championing best practice in the sourcing and production of marine ingredients, MarinTrust is a programme that is dedicated to marine ingredient production factories, allowing those factories to gain recognition for responsible sourcing and production.

Since its inception, the MarinTrust programme has grown into the market leader for the certification of marine ingredient producing factories.

The MarinTrust Global Standard for Responsible Supply of Marine Ingredients (the Factory Standard/the Standard) has been developed and maintained in line with the MarinTrust mission and vision.

Governance

The MarinTrust programme is overseen by the MarinTrust Governing Body Committee (GBC), which is responsible for the continued advancement of the MarinTrust standards to ensure they remain both credible and relevant with respect to the stated objectives.

Specific sub-committees exist to provide expertise on areas within the programme.

The committees represent the full marine ingredient value chain, including marine ingredient producers, feed processors, fisheries and aquaculture standard holders, retailers, fisheries experts, and non-governmental organisations (NGOs).

Further information is available on the MarinTrust website, governance structure¹ page.

About this document

This document provides information about the 60-day public consultation stage of the development of Draft V3.0 Factory Standard. It provides:

- A summary of the public consultation process.
- Feedback received.
- Follow up actions and committee decisions.

¹ www.marin-trust.com/about-us/governance-structure

The public consultation summary reports has been be published after all feedback from the consultation process has been assessed by the relevant committees within the MarinTrust governance structure².

See the [Annexes 1 to 4](#) for all feedback and response or action taken to address the comments based on review and decision by the relevant MarinTrust governance body.

The development of V3.0

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.
- 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.

² www.marin-trust.com/about-us/governance-structure

- 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.

The development timeline

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

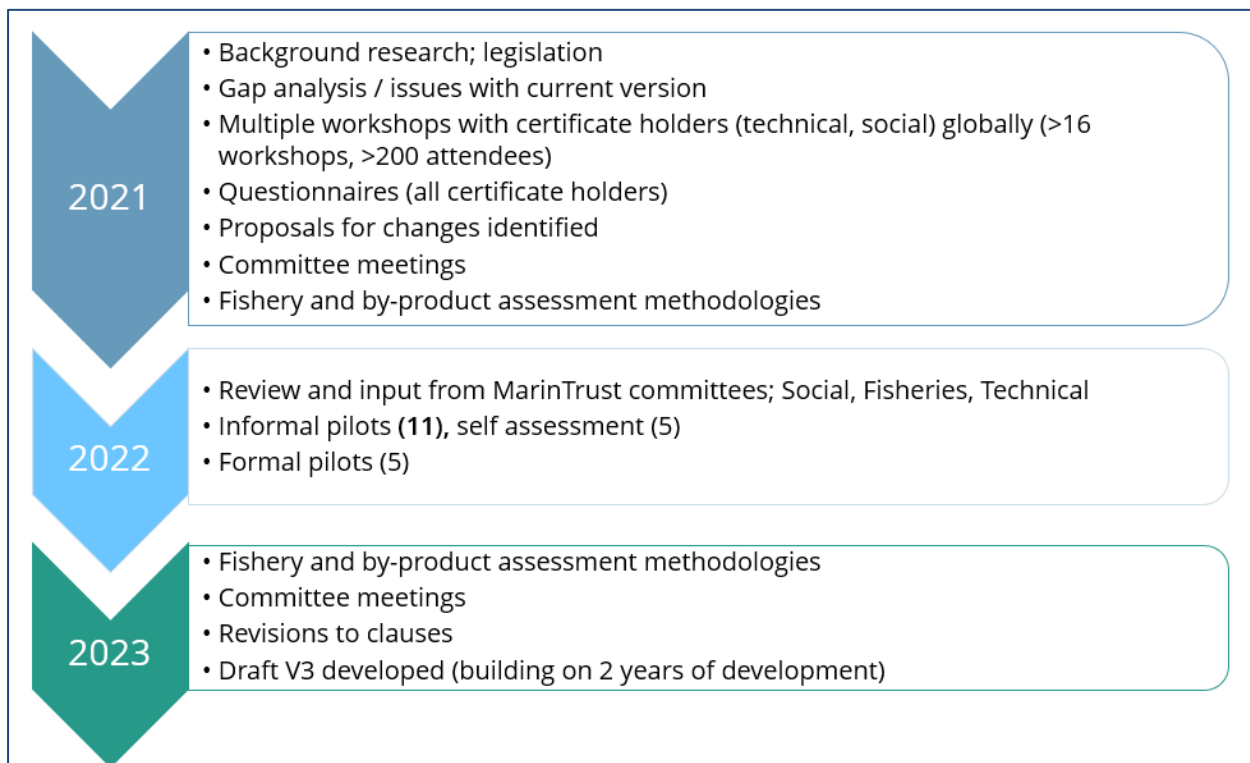


Figure 1: The V3.0 development process

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 complementarity, 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.

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.

Public consultation is an essential requirement for programme assurance and future accreditation.

Timeframe

The V3 consultation process opened on 4th May and closed on 3rd July 2023.

Public consultation documents

The draft V3 consisted of three main elements, each with their own associated documents. The documents released included:

- Raw material assessments (Figure 2)
 - Revised whole fish fishery assessment methodology.
 - Revised by-product assessment methodology.
- Draft factory standard (Figure 3)
 - Supporting templates and guidance for specific requirements in the factory standard.

1. [MarinTrust DRAFT V3 by-product assessment – public consultation guide](#)
2. [MarinTrust DRAFT V3 by-product assessment – full draft](#)
3. [MarinTrust DRAFT V3 whole fish fishery assessment – public consultation guide](#)
4. [MarinTrust DRAFT V3 whole fish fishery assessment – full draft](#)

Figure 2: List of documents released for the whole fish and by-product assessments

1. [MarinTrust DRAFT V3 factory standard – public consultation guide](#)
2. [MarinTrust DRAFT V3 factory standard – Excel clauses for public consultation](#)
3. [MarinTrust DRAFT V3 factory standard – Metrics template](#)
4. [MarinTrust DRAFT V3 factory standard – Supplier and subcontractor approval guidance](#)
5. [MarinTrust DRAFT V3 factory standard – Risk assessment guidance whole fish vessels](#)
6. [MarinTrust DRAFT V3 factory standard – Traceability exercise template](#)
7. [MarinTrust DRAFT V3 factory standard – Mass balance template](#)
8. [MarinTrust DRAFT V3 factory standard – Marine ingredients for human consumption guide](#)
9. [MarinTrust DRAFT V3 factory standard – TACCP and VACCP template](#)
10. [MarinTrust DRAFT V3 factory standard – Factory social risk assessment guidance](#)

Figure 3: List of documents released for the factory standard

Feedback mechanisms

Two main ways were provided to submit feedback:

- A survey to indicate satisfaction levels relating to the changes and obtain general comments, and
- Completion of detailed feedback for comments by criteria (assessment methodologies) and by clause (factory standard).




	Click for online survey – for general feedback and queries
	Click for full Excel – for specific feedback on clauses Once completed, please send to standards@marin-trust.com (before 3rd July)
	Click for Excel (for specific feedback) on raw material sourcing Once completed, please send to standards@marin-trust.com (before 3rd July)

Figure 4: Ways for stakeholders to provide feedback

After the closing date, all feedback was collated and categorised to determine follow up actions.

Communication activities

Public consultation engaged a vast array of stakeholders through a variety of platforms including the MarinTrust website, social media (LinkedIn & Twitter), newsletters, and events (Figure 5). A stakeholder list was developed in advance and all stakeholders were then targeted directly through email or on social media. Table 1 shows performance data for social media posts.



Figure 5: Copies of social media posts

Table 1: Social media performance

LinkedIn	Total number of posts: 38	Average impressions per post: 406 Highest impression 2,990	Increase of followers: 221 (to total of 1,952) Reactions up by 64%
Twitter	Total posts: 36	1.8K impressions over this period	Average likes: 58

The MarinTrust website had a dedicated webpage (www.marin-trust.com/v3_public_consultation) for the duration of the public consultation and beyond.

Results of the public consultation

A total of 22 responses were received, the majority of which included detailed comments. Responses came from multiple sectors (Table 2) and regions (Figure 6).

Table 2: Responses by sector

Sector	Detailed response	Survey response
Marine ingredients processor	5	
Standard holder	3	1
Industry association	2	
NGO		2
Academic / research	1	1
Retailer	1	1
Consultant / independent	1	
Feed producer	1	
Fish processor	1	
Aquaculture		1
Non-specified		1
	15	7

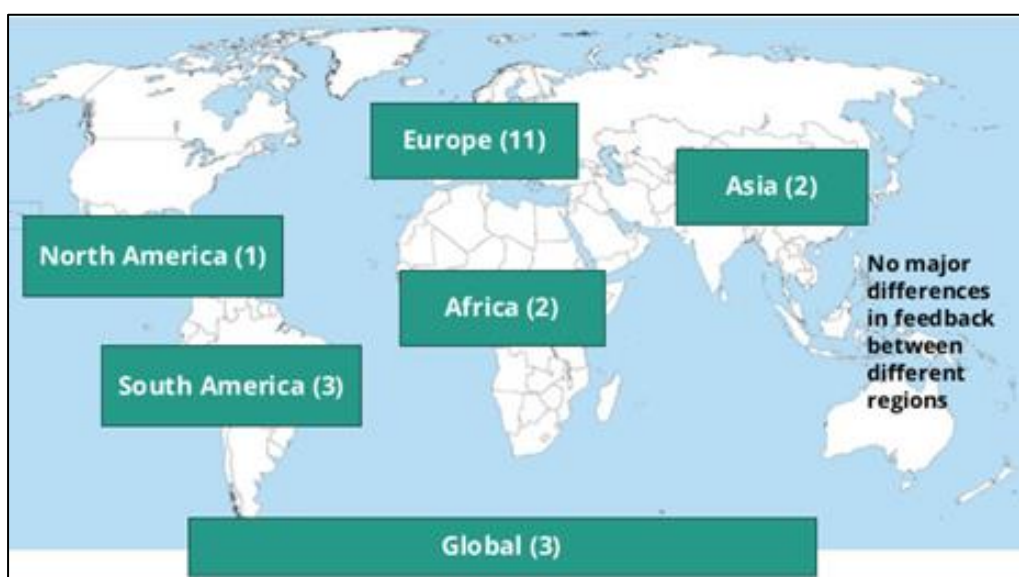


Figure 6: Responses by region

The surveys received a limited response rate and, whilst useful, are only indicative of sentiment.

Detailed responses were provided against a clause or as general comments. All of the comments and feedback received are included in [Annexes I to 4](#).

Responses to raw material assessments

Whole fish fishery assessment

The survey had few respondents (Table 3) but indicated that the draft whole fish fishery assessment was acceptable.

Table 3: Survey results for whole fish fishery assessment

Survey questions	Section 1	Section 2	Section 3
	Management (n=4)	Species assessments categories (n=3)	Ecosystem
Are the clauses in this section clear?	100%	100%	100%
How achievable is it to meet the clauses in this section?	100%	100%	100%
These changes are acceptable to me.	100%	100%	100%

Detailed feedback was received against 10 clauses / subclauses (60 clauses consulted on). The main feedback themes were:

- Clarity of technical requirements of certain sections of the assessment methodology.
- Auditability of certain clauses / sub-clauses.

By-product assessment

The survey had few respondents (Table 4) but indicated that the by-product assessment was acceptable, albeit challenging in Section 3 which relates to risk management / mitigation.

Table 4: Survey results for by-product assessment

Survey questions	Section 1	Section 2	Section 3
	CITES & IUCN Red List check	Country IUU risk assessment	Management assessment framework
	n=3		

Are the clauses in this section clear?	100%	100%	100%
How achievable is it to meet the clauses in this section?	100%	100%	66% achievable
			33% hard
These changes are acceptable to me.	100%	100%	100%

10 items of detailed feedback were received on specific requirements of the assessment. Key themes included:

- Request for alignment to effective fishery management.
- Clarity of the risk assessment methodology in all the steps (some parts clearer than others).
- Alignment to other risk assessment methodologies in use.
- Ensuring references used are valid for by-products.

Responses to the Factory Standard

The survey had few respondents (Table 5) but indicated that the draft factory standard was acceptable, albeit challenging in Section 1: Responsible sourcing.

Table 5: Survey results for the factory standard

	Section 1 Responsible Sourcing	Section 2 Quality Management System	Section 3 Responsible raw material sourcing practices	Section 4 Responsible traceability practices	Section 5 Good manufacturing practices	Section 6 Staff training and competence	Section 7 Social accountability and community	Section 8 Environmental accountability
Survey questions	(n=5)	(n=4)					(n=5)	(n=4)
Are the clauses in this section clear?	80% yes	100%	100%	100%	100%	100%	100%	100%
	20% no							
How achievable is it to meet the clauses in this section?	80% achievable	100%	100%	100%	100%	100%	100%	100%
	20% hard		(n=3)					

These changes are acceptable to me.	100%	100%	100%	100%	100%	100%	100%	100%
	(n=4)	(n=3)						

Of the 201 clauses in V3 draft, the majority received no comment or feedback. Only 39 clauses (19%) received at least one response.

Any clauses that received comments mostly received 1 or 2 comments. Only 3 clauses received more than 3 items of feedback (Table 6).

Table 6: Number of comments received

Number of comments received (for clauses that received comments)	1	2	3	4	5
Number of clauses receiving that number of comments	18	9	9	2	1

The sections of the draft factory standard that received most comments were Section1: Responsible sourcing, Section 2: Quality management system and Section 3: Responsible raw material sourcing practices. The other sections received a relatively low number of comments (Table 7).

Table 7: Comments received by section

Sections of V3.0 draft factory standard	No. of comments per section
1 Responsible Sourcing	9
2 Quality management system	29
3 Responsible raw material sourcing practices	16
4 Responsible traceability practices	4
5 Good manufacturing practices	6
6 Staff training and competence	5
7 Social accountability and community	6
8 Environmental accountability	4

Review of feedback

Each item of feedback was initially categorised according to the type of feedback and extent of any follow up action required (Figure 7).

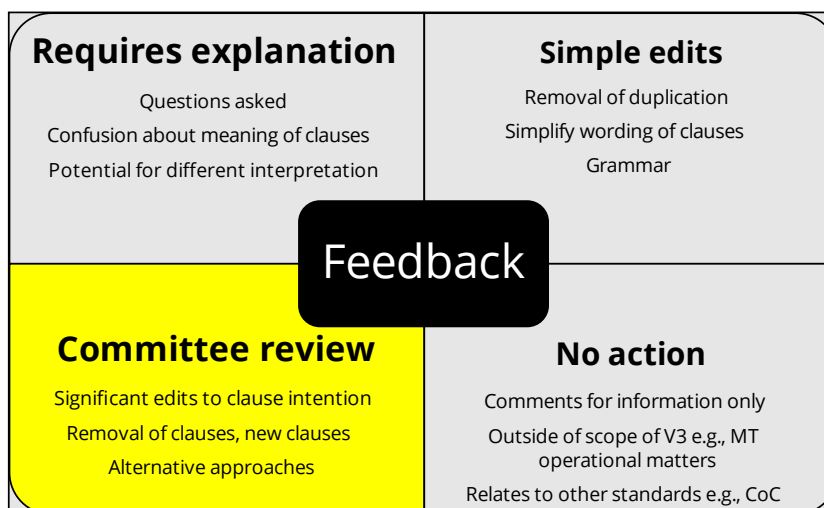


Figure 7: Categorisation of feedback

Feedback comments identified as ‘requires explanation, ‘simple edits’ or ‘no action / not applicable’ have minimal or no impact on the content of V3 and can be actioned accordingly. For example, they may be edits to grammar, or ‘for information’ only.

A smaller number of comments are more substantive proposals for changes. For example, new clauses, issues with clauses or proposals for alternative considerations. Only these are necessary for review by a MarinTrust governance committee.

[Annexes I to 4](#) includes the follow up actions for each item of feedback, as categorised above. Allocation to committee includes the abbreviated name of the MarinTrust committee responsible for reviewing the feedback in the first instance. Figure 8 shows the MarinTrust governance structure with the three committees highlighted responsible for reviewing feedback.

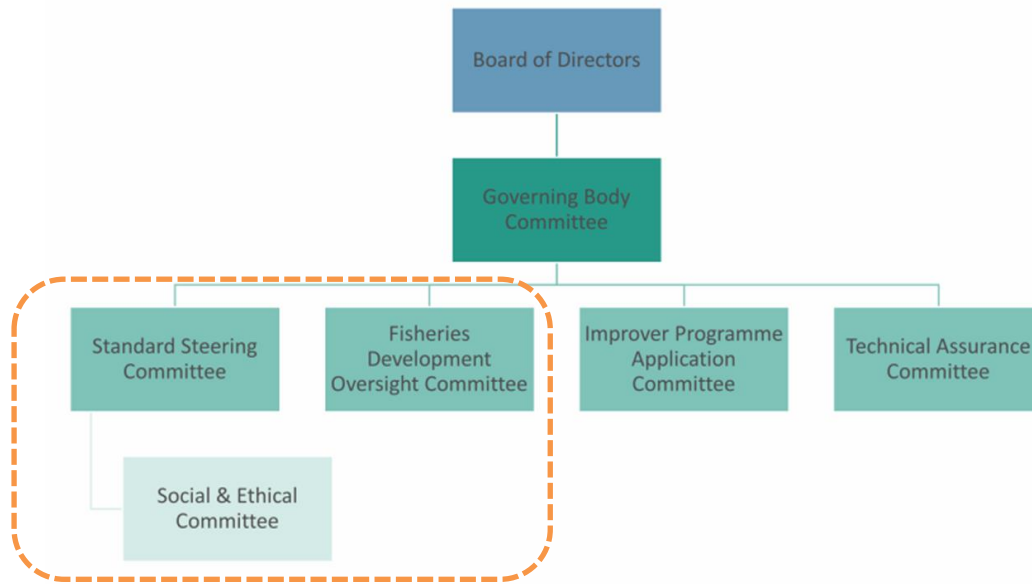


Figure 8: MarinTrust governance committees

- The Standard Steering Committee (SSC) focused on technical areas.
- The Social and Ethical Committee (SEC) reviewed feedback relating to social accountability. As a subgroup of the SSC, their decisions were then reviewed and agreed by the SSC.
- Fisheries Development Oversight Committee (FDOC) were tasked with addressing feedback on the whole fish fishery assessment and by-product assessment methodologies. In addition, FDOC will also review areas of feedback on fish sourcing that link to the respective assessment methodology.

Committee decisions

The three sub-committees assessed all the feedback and made their respective decisions between July-September 2023, after which the draft documents were updated. Revised versions of the whole fish fishery assessment, the by-product assessment and the factory standard clauses were then submitted to the Governing Body Committee (GBC) for their review and agreement.

A number of items from the public consultation have been incorporated into the V3.0 standard.

[Annexes 1 to 4](#) also includes the result of the review by the governance committees, with the final outcome for each item of feedback received during the public consultation.

Annexes

1. [Whole fish fishery assessment feedback and responses](#)
2. [By-product assessment feedback and responses](#)
3. [Factory Standard feedback and responses](#)
4. [General comments](#)

Annex 1: Whole fish fishery assessment methodology feedback

(all feedback allocated to FDOC)

Clause/section	Feedback comments	Decision by the FDOC
Section 1: management		
M1.1 There is an organisation responsible for managing the fishery	Why in this whole fish fisheries, there is no requirement on cooperation with relevant RFMOs, port state measures as regulated in byproduct clauses?	This is addressed in Management and Species requirements.
M1.2.2 There is a system for managing fishery entry such as through licensing or permitting.	Should be enhanced in term of its implementation by modifying "There is a system for managing fisheries entry such as through licensing or permitting and this system is effectively being implemented"	See recommendations in Agenda item #2 whole fish assessment Management clause development
M1.3.3 Evaluation of stock size is conducted through formal assessment approaches with fishery-related scientific information documented and publicly available.	My suggestion is to consider the frequency of stock assessments. Can be asked to update every 03 or 05 years?	This is already a requirement in Category A criteria already.
	In addition, this stock assessment should be for all target and non-target species?	Category A assesses the target stock. Management criteria assess the entire fishery. This distinction has been clarified throughout the Management criteria section.

M1.3.4 The management system receives scientific advice regarding stock, non-target species and ecosystem status.	suggest adding "target" before "stock"	
M1.3.5 Scientific advice is independent from the management organisations and transparent in its formulation through a clearly defined process	This is very difficult to comply. For example, management organizations and scientific advice organizations are normally belonging to a same ministry which is not independent each other. So what do you mean "independent" here?	Guidance will be added to clarify this.
M2.1.2 There are relevant tools/mechanisms used to minimise IUU activity.	This clause is very general. My suggestion is to identify some relevant tools/mechanisms (e.g. via catch documentation scheme, VMS, port/sea inspections, PSMA implementation, etc.). May be this clause should be combined into M2.3 below?	Sub-clauses have been merged; guidance will support assessors identifying relevant tools/mechanisms.
M2.3.1 The level of compliance is documented and updated routinely, statistically reviewed and available (e.g. % infringements by category/segment) and demonstrates widespread compliance in the fishery, relevant to the fleet and segments, and there is evidence of no substantial IUU.	What about analysis of root causes and the implementation of any corrective actions?	Assessors may consider this additional information, but it may not be publicly available in all jurisdictions.
Section 3: Ecosystem Impacts		

<p>E1.2.1: The information collected in relation to E1.1.3 indicates that the fishery does not have a significant negative impact on ETP species.</p>	<p>This is very difficult to audit. What do you mean "significant negative impact" on ETP species. I suggest including a matrix here (e.g. trend of number of caught ETP species, a risk assessment for ETP species)</p>	<p>Discussed previously with FDOC. Proving 'no significant negative impact' can be difficult but has been part of V2. Guidance will support assessment.</p>
<p>E2.2.1: The information collected in relation to E2.1.3 indicates that the fishery does not have a significant negative impact on marine habitats.</p>	<p>Again, this is difficult to audit</p>	<p>Same as above.</p>
<p>E3.1. Information on the potential impacts of the fishery on marine ecosystems is collected.</p>	<p>This again very difficult to audit because of its definition. In practical, my suggestion is to combine with E2 above to consider all habitats and ecosystem together. I understand habitats is smaller than ecosystem and inside the ecosystem but it is very difficult for data collection when these two sections are separated. Then some parameters be considered to collect are coral reef coverage, biotic and abiotic components, etc.</p>	<p>No action. Remains the same as V2 and reflects the FAO Code of Conduct for Responsible Fisheries.</p>

General comments on whole fish assessment (not specific to clauses)

Feedback comments	Decision by the FDOC
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<p>there should be a paragraph saying that in case of non-evaluated species in the IUCN list or CITES, scientific literature will be applied to clear conservation issues of the species.</p>	<p>The assessment under the relevant species Category sufficient to assess the vulnerability of a species to the impact of fishing.</p>
<p>Clear system for assessment, provides sufficient clarity on what is considered a pass or fail. Bar set at a reasonable level for a sustainability certification.</p>	<p>No action. Positive feedback.</p>
<p>Restructuring supports clarity and is presumed to improve ease and consistency in interpretation. GSSI went through a similar restructuring for its Fishery Management section which has improved ease of use significantly.</p>	<p>No action. Positive feedback.</p>
<p>Change to risk assessment seems more with the times than old system, better reflecting how to assess risks and providing the applicant with tangible tools to complete the assessment while acknowledging the challenge of obtaining all the required info to fully exclude IUU-fishing. That being said, a rewriting or restructuring might make the clause easier to work with. Providing even more of a step-by-step</p>	<p>No action. Positive feedback. Template design and supporting assessment methodology/guidance will reflect this feedback.</p>
<p>Use of existing tools, acknowledging that the applicant needs support with assessing the risk for a topic as challenging as IUU</p>	

	No action. Positive feedback.
All the requested information is relatively easy to look up for the applicant.	No action. Positive feedback.
Country risk approach is commonly used by importing countries and standards, with success it seems. No concern about MarinTrust doing the same.	No action. Positive feedback.

Annex 2: By-product assessment methodology feedback

(all feedback allocated to FDOC)

Clause/section	Feedback comments	Decisions by FDOC
CITES Appendix 1 and 2	May be this is too ambitious because CITES still allow with conditional permission to trade internationally some species under Appendix 2. Could be changed to ban sourcing byproducts from Appendix 1 of CITES only	FDOC deem both Appendix 1 and 2 appropriate to retain.
Step 2 - IUU Risk Assessment	ASC have a 'Identify flag state spreadsheet' so it would be good to align these as much as possible.	This will be taken into consideration and reviewed any inconsistencies can be discussed with ASC.
IUU Fishing Index	The index is not updated one (still in the assessment of 2021). In addition, the development is not clear in term of its accuracy/robust. The Map of EU carding decisions should consider assessing IUU fishing as well?	IUU fishing index is updated annually – and they plan to release 2023 version in Q4. MarinTrust maintains a dialogue with the developers of IUU Fishing Index. EU carding decisions is an indicator in the IUU Fishing Index. It is also used as a separate indicator in Step 3.
	ASC also use the IUU fishing Index but look at different scores and apply a different methodology to calculate a final score. This results in different scoring (see attached sheet) - it would be useful to better align if possible.	MarinTrust considered alignment with ASC's documents in the development of this criteria. Differences are

		intentional and can be further discussed with ASC if necessary.
Step 3 - Management Framework Assessment 3.1. There is a management system/ governance in place in the country from which the by-products are sourced	Please consider effectiveness of management system. What if a management system in place but it is not performing effectively? May be pay more information on what the country doing in RFMOs via its reporting system (i.e. annual report of contracting party to RFMOs), vessel registration on RFMO system, MCS activities following RFMOs requirements, etc.	This feedback is considered in guidance under development for Step 3 by-product IUU risk assessment.
3.1.b Worldwide Governance Indicators (WGI) regulatory quality score	Suggest aligning with ASC WGI threshold scoring	This feedback is considered in guidance under development for Step 3 by-product IUU risk assessment.
3.1.c Global Slavery Index (GSI) National Fisheries policy	Suggest aligning with ASC GSI threshold scoring	This feedback is considered in guidance under development for Step 3 by-product IUU risk assessment.
3.2. There is monitoring through a regime which may include at sea and portside inspections, observer programmes, and VMS.	Unclear how overall risk is determined from the assessment. Suggest better alignment with ASC Feed Interpretation Manual Table 22: Fishery assessment for risk factors of by-product derived marine ingredients	This feedback is considered in guidance under development for Step 3 by-product IUU risk assessment.
3.2.a Is the country flagged under EU carding system?	Why coastal states measures have not been considered here? In practical, fishing fleets of flagged states can fish in authorization areas of coastal states via bilateral fishing agreements. In this case, coastal state measures will apply	This feedback is considered in guidance under development for Step 3 by-product IUU risk assessment. It is unlikely coastal state information will be available for all by-product raw materials.

	to flagged states vessel. Then coastal states will be responsible for fisheries management in this case.	
3.2.b Is the flag state a signatory to the port state measures agreement?	See above, please consider further on the effectiveness of the PSMA implementation	This feedback is considered in guidance under development for Step 3 by-product IUU risk assessment.
3.2.c Does the country have mandatory vessel tracking for commercial fishing fleet?	none	

General comments on by-product assessment (not specific to clauses)

Feedback comments	Decision by the FDOC
As mentioned for the whole fish assessment: questions for the applicant are all on topics that can easily be found.	No action. Positive feedback.
Reduction of criteria where possible is always helpful.	No action. Positive feedback.
(Section 2) Sufficiently clear. Unclear if guidance on "other sources" will be provided still. If not, it may be helpful to have clarity on what those other sources should be able to do to meet the objective and be considered	The clause has been revised and additional guidance developed to support assessors.

equivalent. Having non-exhaustive examples in guidance has been proven very helpful, especially for those less experienced with certification.	
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Annex 3: Factory Standard feedback

Please note clause numbers are based on those issued in the public consultation version and may be superseded in the final version.

Section 1: Responsible sourcing pre-requisites				
Clause number	Clause	Comments received	Follow up required Edit Committee review Guidance Reject	Final decision
1.1	In this standard to comply with the definition of Responsible Sourcing, the Facility shall be able to demonstrate:	<p>It should be a general requirement that all landings of raw material is surveyed by an independent accredited third-party surveyor including both weighing and species composition in each catch.</p> <p>As this is a general statement on responsible sourcing, it should present all possible sources of raw materials. Aquaculture products should therefore be mentioned, especially as these species are dealt with later in the standard.</p> <p>Fisheries authorities are competent authorities in Norway for IUU risk assessment. It would be more than welcome that European factories have not to proceed with extra assessment.</p> <p>A statement from the suppliers / The Norwegian pelagic sales organisation / the Norwegian authorities should be enough to demonstrate raw</p>	Committee review - FDOC	<p>Raw materials are assessed and approved. The factory audit is undertaken by an independent auditor.</p> <p>This section applies to wild capture raw materials only as a pre-requisite. Aquaculture raw materials are approved providing they comply with the relevant requirements of this standard.</p> <p>The raw material assessments are essential for assurance and must be included.</p>

		materials are not sourced from IUU fishing activity, especially for by-products."		
1.2	The Facility shall source whole fish raw material from a MarinTrust approved fishery, and/or MarinTrust recognised equivalent fishery and/or an accepted MarinTrust Fishery Improvement Project (FIP).	This proposal seems very restrictive. Indeed, in the case of a loss of MarinTrust approval by a fishery, the facility is no longer able to source whole fish raw material only from a MarinTrust approved fishery. In that case (loss of certification), what will be the consequences for the facility certification? Is it possible to have more flexibility on this clause?	Committee review - FDOC	The scope of certification applies to approved raw materials only. A facility must source approved raw materials to remain certified. Separate guidance is being developed on this.
1.3	The Facility shall source wild-capture by-product raw material from a MarinTrust approved by-product species, and/or MarinTrust recognised equivalent by-product species.	<p>Same comments than above, this proposal seems very restrictive. Is it possible to have more flexibility on this clause? In particular in EU, facilities will be penalised by landing obligation. We identify an important risk with this draft clause for registered by-catch in raw materials. An allowance of up to 9% by-catch is needed.</p> <p>Same comments than above, this proposal seems very restrictive. Is it possible to have more flexibility on this clause? In particular in Norway - as in the EU - , facilities will be penalised by landing obligation. We identify an important risk with this draft clause for registered by-catch in raw materials. An allowance of up to 9% by-catch is needed.</p>	Committee review - FDOC	The scope of certification applies to approved raw materials only. 9% by-catch is not accepted on the basis that it is a backwards step.

Section 2: Quality management system

Clause number	Clause	Comments received	Follow up required <ul style="list-style-type: none"> • Edit • Committee review • Guidance • Reject 	Final decision
2.4	Document management and control			
2.4.1	The Facility shall have a written document control procedure which applies to all documents necessary to comply with the full scope of this Standard.	Each company will demonstrate during the audit, compliance with the standard without the need to have a document control procedure. This point requires having a management system.	Committee review - SSC	Reject proposal, retain as is It is an essential requirement for a quality management system.
2.4.2	The document control procedure shall include:	This clause will be very difficult to comply with, since not all manufacturing companies have document management systems.	Committee review - SSC	Reject proposal, retain as is It is an essential requirement for a quality management system.
2.5	Reporting performance indicators			
	The Facility shall provide information on its social and environmental performance on an annual basis (every 12 months) using the	<p>The facility should have the choice of when it gives its updated information. We do not wish to have a fixed date every 12 months.</p> <p>The companies have developed in their integrated reports, their performance in social commitment, for example, the Dow Jones Sustainability Index, another, it is not necessary</p>	Guidance	We have built flexibility into the template to account for different reporting periods. It's essential that the information is available at the time of the audit but it can cover the preceding year.

	template available from MarinTrust.	to create new records about the same, since they are published on the companies' web pages and are for public use. the auditor should only ask or consult directly.		
2.7	Control of product and process nonconformities			
2.7.2	Where nonconforming marine ingredients have been identified, the facility shall ensure these are fully segregated from compliant marine ingredients and disposed of in a legal manner where appropriate.	"It is not understood what the clause that says: non-compliant marine ingredients refers to. Note that the Chilean fishery is mixed, there are landings with non-MarinTrust species that are impossible to physically separate."	Minor edit	change compliant to conforming
2.7.3	The Facility shall inform any customer affected by a nonconforming MarinTrust marine ingredient as soon as practicably possible, but no later than 24 hours following detection.	"Request to input ""serious"" in the clause, and to change ""detection"" by ""confirmation"" in the clause: ""The Facility shall inform any customer affected by a serious nonconforming [...] but no later than 24 hours following confirmation." "It is not understood what the clause that says: non-compliant marine ingredients refers to. Note that the Chilean fishery is mixed, there are landings with non-MarinTrust species that are impossible to physically separate."	Committee review - SSC	Reject proposal to change wording but change 24 hours to 48 hours. Changing the wording is too subjective but the reporting timeline is too stringent and should be changed back to 28 hours as per V2.0
2.9	Correction and corrective actions			

	The Facility shall have procedures for the determination and implementation of corrections and corrective actions in the event of any nonconformity that ensures:	If the non-conformity product cannot be corrected, cannot be held or not released, it must be sold to a non-certified Marintrust.	Guidance	clarification on this that if products don't comply with MT requirements they can be used for other customers / uses
2.11	Supplier approval and monitoring			
2.11.1.2, 2.11.4.3 2.12.4 (3 clauses with same content)	<p>The Facility shall ensure supplier agreements include a reference to their social policy or commitment, signed by the suppliers, to demonstrate they have the following:</p> <ul style="list-style-type: none"> responsible recruitment and employment (which includes workers have access to grievance mechanisms and no worker pays recruitment fees), 	<p>This only requires the supplier to sign a compliance agreement. Monitoring compliance with the supplier's agreement, our company is not competent enough to supervise</p> <p>final bullet point could be improved: " no discrimination based on gender, sex, ethnicity, race, nationality, age, religious or political conviction or any other category of people."</p> <p>The facility can request suppliers to comply with the social commitment policies, however, since they are third parties, it is impossible to ensure that they are always complying, our company cannot do the work of the specialized authorities that oversee labour laws.</p>	Committee review - SEC	<p>Accept changes in part with additional edits.</p> <p>The clauses (and those of the same content in other sections) will be updated to include association and the final bullet point edited. Additional edits are to be made to the wording to improve clarity.</p> <p>The guidance will provide further clarification on the expectations on facilities of how to undertake checks on these areas. This will be consistent for vessels and land-based facilities. Guidance will require evidence to be available, for example policies, procedures, level of communication and checks with the suppliers/service providers.</p>

	<ul style="list-style-type: none"> • all workers have chosen employment freely, • there is no child, forced, bonded, prison or involuntary labour, • all employees/workers are paid in line with legal requirements, • all health and safety requirements are in place, and • there is no discrimination based on gender, ethnicity, race, nationality, age, religious or political conviction or any other characteristic. 	missing access to collective bargaining and freedom of association		
2.11.2	Vessels supplying whole fish			
2.11.2.1	The Facility shall complete and document the results of the MarinTrust	"In the case of being supplied by third-party vessels, we do not see how we could influence the will of the owner of the vessel. The company will only be able to report social	Committee review - SEC	Accept in part The risk assessment shall remain as the MT method.

	<p>social responsibility risk assessment for all vessels supplying whole fish.</p>	<p>responsibility requirements to MarinTrust, but compliance will depend on a third party."</p> <p>"For Part A 'Country Risk Assessment', ASC Feed Standard & MarinTrust methodology differ. This results in a MT low risk rating for the following countries (against ASC medium risk): Argentina, Denmark, Faroe, Germany, Mauritius, Norway & Spain. Suggest further collaboration to understand if we can better align risk rating methodology (see additional attached excel with risk outcome tab added).</p> <p>Also consider how long facilities will have to implement a change in risk rating into their supply chain - ASC also need to determine a timeline so would be good to align.</p> <p>For Part B.1 Q1, is a low risk outcome calculated on the basis that the social requirements of the MT Factory Standard apply to the workers on the vessels? If so, then please make explicit in guidance. If not, then how is low risk calculated?</p> <p>For Part B1. and B.2., the social requirements content states that it aligns to the ILO decent work indicators, however they do not align with all 10 ILO indicators. We would strongly suggest adding 'access to collective bargaining & freedom of association' which is in line with ILO Fundamental Principals and Rights at Work (and perhaps a better reference for the social requirements content?). Forced and child labour</p>		<p>The expectations of checks will be aligned with those for other suppliers, there is no justification for treating vessels differently.</p> <p>Guidance will provide more information on what checks could look like.</p> <p>The method will be made widely available and the list of countries will be greater than at present. We will retain the low, medium and high ratings as they are required for different clauses/uses.</p> <p>We will provide greater clarity around the longer-term plans i.e. that go beyond the 1-3 years and target of 50%. The longer-term vision is that all vessels will be covered in time</p>
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		<p>are best covered with the prohibition of those things, plus a grievance mechanism and ideally plus collective bargaining and freedom of association. This last one ideally creates systems and culture where workers are able to join together, to make changes to working conditions etc.</p> <p>The assurance for this requirement is not strong enough - having an agreement which states that a social policy is in place is not proof of implementation. Would expect to see as a minimum that: copies of policy(ies) are provided and that a named member of senior management must be responsible for the implementation of the policy. Grievance Mechanism should ensure confidentiality of the party making the complaint. Ideally further evidence of implementation should be required. A phased approach is acceptable; the timelines seem long for something not very complex. Only 50% after 3 years of introducing these requirements seems very low.</p>		
2.11.3	Suppliers of by-product raw material			
2.11.3.1	For wild-capture by-products identified in the MarinTrust by-product assessment as having a medium risk of coming from IUU	<p>"The proposal clause is unclear:</p> <ul style="list-style-type: none"> - How does the Facility verify this information with the suppliers? - How often does the Facility need to verify this information?" 	Guidance	can provide guidance that low-risk suppliers may be assessed less frequently than higher risk. For example, high risk could be at least annually or more if they are new.

	<p>fishing activity (MarinTrust 'Approved Source with Caution'), the facility shall have:</p> <ul style="list-style-type: none"> • supplier agreements for all suppliers of those by-products, • assurance from the suppliers that the by-products are not from IUU sources, and • verified this information with the suppliers. 	What assurance would be acceptable?		
2.11.3.2	For wild-capture by-products identified in the Marin-Trust by-product assessment as having a high risk of coming from IUU fishing activity, the Facility shall have a procedure to demonstrate how this is managed.	Manage to lower the risk level or not to source at all? If to lower risk level what would be accepted as evidence?	Guidance	High risk byproducts cannot be used for MT purposes. They may still be sourced for non-MT uses. The procedure would need to show how they are segregated. a new by-product assessment would be required to demonstrate the risk has been reduced. If byproducts remain high risk, they MUST NOT be sourced

2.11.3.3	For by-product suppliers, wild capture or aquaculture, the Facility shall document the following key data elements (KDEs):	This clause should be the first one of the 2.11.3 section as it seems it refers to "approved" by-products. It is proposed that the clauses be reordered as follows to maintain the hierarchy approved/medium risk/high risk: this clause becomes 2.11.3.1 and the actual draft clauses 2.11.3.1 and 2.11.3.2 are therefore numbered 2.11.3.2 and 2.11.3.3 respectively.	Minor edit - move clauses in section	review section flow
2.11.4	Third party suppliers of raw materials			
2.11.4.2	The Facility shall ensure it informs the third-party supplier of the requirements to maintain the product integrity status of the approved raw materials, by segregating approved raw materials from non-approved raw materials, and from raw materials from an accepted MarinTrust Fishery Improvement Project (FIP).	Chile has a mixed fishery, we cannot separate the different species of raw material, we know what % each one is, but it is impossible to separate fish.	Guidance	Guidance - if they are mixed, they cannot be labelled as MT

Section 3: Responsible raw material sourcing practices

Clause number	Clause	Comments received	Follow up required	Final decision
3.1	Reporting and recording of whole fish and by-product raw materials	"As we have already commented above (clauses 1,2 and 1,3), Facilities need more flexibility, in particular to deal with by-catch fisheries. Including a stated allowance of 9% would be welcome."	<ul style="list-style-type: none"> • Edit • Committee review • Guidance • Reject 	This has been discussed and agreed previously. To change to 9% would be a backwards step as V2.0 includes 5%.
3.2	Whole fish raw material			
3.2.1	Whole fish raw material shall be traceable to a MarinTrust approved fishery / fisheries, and/or MarinTrust recognised equivalent fishery.	Would a reference to GSSI fit here?	Reject	Guidance will include this as a possibility but this will refer to the equivalency procedure. No named schemes or standards will be included in V3.
3.2.5	The details of each consignment of whole fish landed from a vessel shall be recorded and include the following key data elements (KDEs): date of discharge,	Dates of fishing are not recorded on catch certificates delivered by competent authorities and are fish are legally sourced. It will be very difficult for Facilities to obtain the information. We therefore request that dates of fishing be withdrawn.	Committee review - SSC	

	species (including Latin name) and quantity discharged to the facility,	<p>Ideally also require that the described KDEs are registered for all fish material received by the factory, not only certified material</p> <p>Regarding species in Latin do not think that it is practical on each landing – should be part of the system and clearly defined.</p> <p>"It is not important to specify the Latin name of the downloaded species, the common name certified and approved by Chilean law is enough. complicates the certification operation of landings of raw materials"</p>		<p>Reject proposal to remove.</p> <p>scientific name is essential as it is the only naming convention that relates to specific species. Refer to FAO 3 alpha codes, or national official species lists. Common names alone are not acceptable.</p>
	catch areas where catch originated,			
	dates of fishing,			<p>Reject proposal to remove.</p> <p>Clarify catch dates / dates of fishing / fishing vessel trip dates / trip length in guidance It is essential to retain fishing dates as it is essential for traceability.</p>
	fishing method / gear used for the catch of fish (if the vessel is multi rig).			
3.3	By-products			
3.3.1	By-products from wild capture			
	By-products from wild capture species shall be traceable to a MarinTrust approved by-product species, and/or MarinTrust recognised equivalent by-product species.	<p>"Should a statement from suppliers be enough? As we have already commented above (clauses 1,2 and 1,3), Facilities need more flexibility, in particular to deal with low volume or low frequency by-product species. Including a stated allowance of 9% would be welcome."</p>		<p>Guidance - If it is for MT purposes / labelled / sold as MT then it must be from an approved source. This does not avoid the use of non-MT sources but they must not be labelled as MT</p>

3.3.2	By-products from wild capture or farmed origin			
3.3.2.2	<p>Raw material originating from suppliers may only be used to produce marine ingredients if it meets the following criteria:</p> <ul style="list-style-type: none"> The fish by-product shall come from fish that is intended for human consumption, evidenced in a documented policy provided by the Facility, and The Facility shall be able to trace the origin of material back to the supplier and / or handler. 	<p>We call for vigilance in the application of this clause, and not to confuse the intended use of the fish with the nature of the supplier. It would be damaging to exclude raw materials from pet food manufacturers, even though these fish by-products comply with this clause (they also come from fish that is intended for human consumption).</p>	<p>Committee review - SSC</p>	<p>Accept inclusion of pet food</p> <p>This opens up new markets for accessing by-products. And the material would still require MarinTrust approval.</p> <p>Guidance - explain that the source of by-products may be non-food facilities e.g. pet food manufacturers so long as the by-products are still acceptable for human consumption.</p>
3.3.2.3	<p>The details of each consignment of by-products from a supplier shall be recorded and shall include the following key data elements (KDEs):</p>	<p>Clause 2.11.3.3 (supplier approval and monitoring) requires Latin names shall be documented by the Facility. Latin names should not have to be required with every consignment especially in the case of a mix of species.</p> <p>Ideally also require that the described KDEs are registered for all fish</p>	<p>Committee review - SSC</p>	<p>Reject.</p> <p>This relates to GDST KDE. Latin names are essential.</p>

		material received by the factory, not only certified material		
	Supplier name and/or handler name,			
	Species (including Latin name), or for by-products containing more than one species, a list / description of species (including Latin names) contained in the mix, and			Reject, retain as is Also scientific name is essential as it is the only naming convention that relates to specific species. Refer to FAO 3 alpha codes, or national official species lists. Common names alone are not acceptable.
	Date of production and/or of dispatch from the supplier.			
3.3.2.4	Records of the above shall be maintained.	Is this clause redundant? There's already a general requirement to keep all records (2.4.3) that demonstrate compliance with the standard.	Edit	Remove due to duplication
3.3.3	By-products and other raw fishery materials from aquaculture species			
3.3.3.3	Records of the above shall be maintained.	Is this clause redundant? There's already a general requirement to keep all records (2.4.3) that demonstrate compliance with the standard.	Edit	Remove due to duplication

Section 4: Responsible traceability practices

Clause number	Clause	Comments received	Follow up required Edit Committee review Guidance Reject	Final decision
4.1	The Facility shall have a documented product management system in place to demonstrate how MarinTrust compliant raw materials are identified and, where applicable, segregated from accepted MarinTrust Fishery Improver Project and/or non-compliant raw materials.	<p>"To add at the end of this draft clause: ""Regarding sorting and weighing landings, the Facility shall demonstrate that landings are sorted and that scales cannot be manipulated, for example by having a system in place verified by a third party (who can be a certificated body or competent authorities...) in person or remotely.</p> <p>A requirement that traceability information that is registered also follows each batch of certified material sold</p> <p>Why identify the raw materials that do comply, the important thing is that the conformation of the product, batch of flour or oil, complies with being</p>	Committee review - SSC	<p>Reject proposal to amend</p> <p>Other clauses relating to weighing, mass balance etc should be sufficient to cover this. ensure those clauses have relevant guidance around weighing.</p>

		made up of at least 95% MarinTrust certified species?		
NEW CLAUSE		Include a requirement for the facility to justify that weighing systems cannot be manipulated and that weighing results cannot be falsified.	Committee review - SSC	Reject new clause Other clauses relating to weighing, mass balance etc should be sufficient to cover this. Ensure those clauses have relevant guidance around weighing.

Section 5: Good manufacturing practices

Clause number	Clause	Comments received	Follow up required	Final decision
	The Facility shall have separate HACCP plans for marine ingredients destined for food and / or feed to cover and control all the risks associated with each type of product.	For human consumption oil, the risks are the same and the machines are the same. It is not justified to have a different HACCP-based Quality Assurance Plan.	Guidance Edit Committee review Guidance Reject	Guidance - if the sanitary authority in the country permits it to be the same (food / feed) then the need for separate HACCP is not required.
5.5	Threat Assessment and Critical Control Points (TACCP) / Vulnerability Assessment and Critical Control Points (VACCP)			
5.5.1	The Facility shall have a documented review of threats and vulnerabilities to protect the integrity of products intended for human consumption.	Not all companies have VACCP or TACCP management systems required or adequate to comply with this clause, it could be very complex to comply and long to implement, I think it should be optional.	Committee review - SSC	Reject removal of this Is not applicable to many facilities and is part of the ToR. This area should be strengthened in future versions.
5.5.2	This review shall be updated at least annually.	Not all companies have VACCP or TACCP management systems required or adequate to comply with this clause, it could be very complex to comply and long to implement, I think it should be optional.		

Section 6: Staff training and competence

Clause number	Clause	Comments received	Follow up required • Edit • Committee review • Guidance • Reject	Rationale
6.1	The Facility shall have a training and development programme to ensure that all employees are equipped with the necessary skills and knowledge to undertake their role correctly and safely to meet the requirements of this Standard.	We agree with the aim of this clause but the evaluation of this clause should not be too administrative. Furthermore, training and development programme should be organized for employees involved in the Standard, not necessarily for all employees.	Guidance	Guidance - about the types of records that would be acceptable
6.2	Where specific training is required, especially on dangerous machinery as identified within the health and safety risk assessment, employees shall be suitably trained within a time specified manner.	Same comments than above, this clause should not be too administrative.	Guidance	Guidance – will be provided
6.3	The Facility shall have a training and development procedure which includes:	Same comments than above, this clause should not be too administrative. A point is also unclear: how should be reviewed the "effectiveness of training"?	Guidance	Guidance will be provided on what is acceptable

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Section 7: Social accountability and community

Clause number	Clause	Comments received	Follow up required Edit Committee review Guidance Reject	Final decision
7.1	<p>The Facility shall sign and display (clearly) a self-declaration assuring good social practice and human rights of all employees, including:</p> <p>a commitment to ensure no child labour,</p> <p>no discrimination is practised, and</p> <p>no harsh or inhumane treatment is allowed.</p>	<p>We welcome the willingness to facilitate the audit for Facilities located in countries rated "low risk". However, these clauses are already made mandatory by regulation (within the EU in particular). So, in order to further facilitate the compliance assessment, could it be possible to cover this section by a sectoral agreement or an organisation agreement with MarinTrust? In that case, all Facilities included in this agreement shouldn't have to demonstrate evidence for this section 7.</p> <p>We welcome the willingness to facilitate the audit for Facilities located in countries rated "low risk". However, these clauses are already made mandatory by regulation (within Norway in particular). So, in order to further facilitate the compliance assessment, could it be possible to cover this section by a sectoral agreement or an organisation agreement with MarinTrust? In that case, all Facilities included in this agreement shouldn't have to demonstrate evidence for this section 7.</p>	Committee review – SEC, SSC	<p>Reject.</p> <p>There is no justification to not audit each clause, this is essential for assurance. To consider whether the risk-based approach could be extended to reduce requirement to fully audit each yea. However this is risky and requires further consideration.</p>

7.6	The Facility shall have a documented grievance procedure, which details the timeframe within which grievances shall be resolved.	Confidentiality should be assured.	Committee review - SEC	<p>Reject but make other changes</p> <p>The clause will be updated to "The Facility shall have a documented grievance procedure, which details the timeframe within which grievances shall be resolved and ensures that people raising a grievance can do so without recrimination. Remove 'assures confidentiality' as this is challenging where the issue may relate to another person.</p>
7.7	<p>The Facility shall have a documented recruitment procedure for hiring all employees, whether they are employed directly or through agencies, that includes:</p> <p>Recruitment agencies for temporary / seasonal / migrant workers shall be licensed / registered / regulated or have been assessed through the Facility's due diligence checks.</p>	Is this consistent? Previously in the standard, e.g. for sub-contractors, the payment of recruitment fees is not allowed.	Committee review - SEC	<p>Accept</p> <p>Change the wording in the suppliers/service providers sections to be consistent with the wording here.</p> <p>Also to ensure the definitions relating to agency workers, recruitment fees are included in the glossary.</p> <p>Reject 'legally permitted' regarding recruitment fees as this could provide loopholes.</p>

	Information about the payment of recruitment fees, including any costs and who is responsible for paying any fees.			
7.8	Health, safety and welfare			
7.8.4	There shall be first aid and healthcare in line with legislation in the country in which the facility is based.	In Chile, first aid services are provided by mutual societies	Guidance	Guidance will clarify that other means of healthcare can be provided

Section 8: Environmental accountability

Clause number	Clause	Comments received	Follow up required	Rationale
All	All clauses	<p>"Facilities located in the EU are already submitted to many European regulations (and also some specific regulations defined by each Member State). Although, many compliance requirements are cover by BREF. Is there a way to facilitate the evaluation of this section for European factories? It could be clarified that if one of the environmental emissions listed is not required for the permits to be issued for the facility, then its monitoring is not required by this clause and the clause 8,2."</p> <p>Facilities located in Norway are already submitted to many European regulations (and also some specific regulations defined by each Member State). Although, many compliance requirements are cover by BREF. Is there a way to facilitate the evaluation of this section for European factories? It could be clarified that if one of the environmental emissions listed is not required for the permits to be issued for the facility, then its monitoring is not required by this clause and the clause 8,2."</p>	Committee review - SSC	<p>Reject proposal for recognising EU legislation/BREF</p> <p>There are risks with recognising legislation only as it is very varied across different countries. This option has been investigated by other scheme owners and rejected on that basis as need to ensure that there is effective regulation and enforcement. Reliance on ISO 14000 is also not recommended as that is a risk-based approach so does not provide equivalency either.</p>

NEW CLAUSE	Proposal for a new requirement:	Cleaning of wastewater for nitrogen using a biological cleaning method, it shouldn't be allowed to dilute wastewater before discharge.	Committee review - SSC	Reject new clause. Too specific. Could be an issue in many regions. This should be reviewed in a future version.
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Annex 4: General comments

Theme	Comment / feedback from stakeholders	Follow up action required / completed	Rationale for follow up action
Positive	The MarinTrust standard version 3.0 will strengthen today's practice were our company to reference MarinTrust in defining sourcing of responsible fisheries and processing of marine ingredients	Not applicable	No change required
	We welcome the improvements made to the certification standard, which give it greater robustness and credibility with stakeholders. We also welcome the new approach for the raw materials assessments.	Not applicable	No change required
	In addition to providing feedback on the detail of some clauses, we would like to use this public comment process to congratulate MarinTrust on V3 of its standard. We are dedicated to promoting responsible seafood production and our standards require the aquafeed industry to lean heavily on leading assurance programmes such as MarinTrust. The streamlining in V3 will be much appreciated by the marine ingredients industry and the added assurances around standardised traceability and social and environmental requirements will add to the appeal and growing relevance of the whole MT programme. It's also good to see added focus on by-products because they are playing an increasingly important role in aquafeeds while providing circular economy benefits and reducing aquaculture's overall environmental footprint. As MarinTrust extends its equivalence and recognition process via V3, we are in favour of a clear indication of support for fisheries certified to a sustainability standard that is GSSI benchmarked.	Not applicable	No change required
	Overall, it seems like a good update to the standard providing clarity on previously clauses and expectations of the standard.	Not applicable	No change required
About MarinTrust	Even if the price structure is not part of the scope of this public hearing, we express the desire of our members for a review of the Marin Trust cost	Not applicable	Outside of scope

	structure to be undertaken soon. We raise this point in the “other comments” section.		
	Through this public consultation, we would also like to express our desire for a review of the Marin Trust cost structure for companies to be undertaken in the near future. The revision of the standards justifies a review of the costs of certification, in particular for the supply of Marin Trust certified by-products.	Not applicable	Outside of scope
	Through this public consultation, we would also like to express our desire for a review of the Marin Trust cost structure for companies to be undertaken in the near future. The revision of the standards justifies a review of the costs of certification, in particular for the supply of Marin Trust certified by-products.	Not applicable	Outside of scope
Auditing / admin	The standard does not detail the categorization of audit nonconformities. Major, minor, critical nonconformity. It should refer to which document we find this categorization.	Guidance	This is covered in the quality management system and separate procedures.
	MarinTrust Logo: detail in which places, documents the logo and the declaration can be used. What are the statements approved by the Marin Trust?	Guidance	This is covered in the QMS section 2 and in the separate guidelines and requirements for logo use
	In general, we require that clauses evaluation should not be too administrative. Providing documentation should be easy by Facilities, particularly when the clauses refer to regulations in force in European countries. The provision of documentation should be facilitated during the audit.	Guidance	Considered within scope of factory clauses Countries which have effective regulations should find it easy to show evidence of compliance. The auditor will need to see that evidence.
	Some clauses will request more documentation from factories. To limit the administrative burden on factories, we propose the use of a sectoral agreement to facilitate the evaluation and review of documentation for the section 7 (especially as most requirements are regulatory in the European Union).	SSC	Considered within scope of factory clauses
Section 1 Pre-requisites and 3 - Sourcing in the factory standard	General		
	The new version seems to leave little flexibility for factories in sourcing raw materials. This is an issue with registered by-catch in the raw material and low volume by-products. An allowance of up to 9% bycatch is needed.	Reject	Current requirement in V2 wholefish assessment is 5% for by-catch assessment. 9% would be a backwards step

Also includes comments received on the whole fish assessment method and the by-product method	If the assessment can only be done by fishery assessors under a recognised CB will this not create a bottleneck as there will be a large volume of assessments and not enough assessors? Note that for ASC Feed Standard Due Diligence we list competencies of persons conducting the assessment but they can be a feed mill staff member or external organisation (not necessarily a CB). A sample number of DD reports will be reviewed at audit.	Reject	This is a current provision / requirement for V2. Assessors must be trained / competent.
	"MarinTrust Draft V3- Whole Fish Fishery Assessment - Criteria, methodology and guidance document. Possible rewording of MT vision and mission to reflect inclusion of social issues and aquaculture? Vision: The world's marine ingredients will be produced in a safe and responsible manner and sourced from well managed fisheries and aquaculture. Mission: To enable marine ingredient producers to demonstrate responsible practices through their commitment to feed/food safety, social accountability and responsible sourcing of raw material."	Not applicable	This has to be considered for the next version as it relates to a change in focus and would have to be reviewed as part of future ToR development
	Byproducts		
	There is no need for assessment for By-products since by-products are considered as sustainable i.e. in the ASC-standard. In Norway utilisation of trimmings and by- products have been promoted in the RUBIN-programme since the 1980 and are considered sustainable, regardless of the whole fish source.	Reject	This is essential for managing IUU risk. As a global standard this must be included.
	Questions for the applicant are all on topics that can easily be found. Reduction of criteria where possible is always helpful.	Not applicable	Positive feedback

	(Section 2) Sufficiently clear. Unclear if guidance on "other sources" will be provided still. If not, it may be helpful to have clarity on what those other sources should be able to do to meet the objective and be considered equivalent. Having non-exhaustive examples in guidance has been proven very helpful for GSSI, especially for those less experienced with certification.	Guidance	Guidance will be provided
	welcome the revised criteria for by-products	Not applicable	Does not result in a change to V3
	Whole fish		
	there should be a paragraph saying that in case of non-evaluated species in the IUCN list or CITES, scientific literature will be applied to clear conservation issues of the species.	Guidance	Guidance will be provided
	Clear system for assessment, provides sufficient clarity on what is considered a pass or fail. Bar set at a reasonable level for a sustainability certification.	Not applicable	Positive feedback
	Restructuring supports clarity and is presumed to improve ease and consistency in interpretation. (<i>name of scheme</i>) went through a similar restructuring for its Fishery Management section which has improved ease of use significantly.	FDOC	Positive feedback
	Change to risk assessment seems more with the times than old system, better reflecting how to assess risks and providing the applicant with tangible tools to complete the assessment while acknowledging the challenge of obtaining all the required info to fully exclude IUU-fishing. That being said, a rewriting or restructuring might make the clause easier to work with. Providing even more of a step-by-step	Guidance	Guidance will be provided
	Use of existing tools, acknowledging that the applicant needs support with assessing the risk for a topic as challenging as IUU	Not applicable	Positive feedback
	All the requested information is relatively easy to look up for the applicant.	Not applicable	Positive feedback
	Country risk approach is commonly used by importing countries and standards, with success it seems. No concern about MarinTrust doing the same.	Not applicable	Positive feedback

Section 5 Traceability	How will traceability be maintained and monitored in the standard? Alongside this, how will Marin Trust standardise the traceability standard to demonstrate due diligence i.e. digitising data. Will this data usable/available for retailers, when performing their own validation checks?	Guidance	Any information provided to MarinTrust is under a confidentiality agreement with the facility / certification body. It cannot be shared with other parties. As traceability/transparency is an emerging area, V3 cannot stipulate the use of standard systems. Further work is planned in this area but that is not possible to include in V3.
	Support the alignment with GDST	Not applicable	Does not result in a change to V3
Section 7 Social	What level of validation takes place to confirm that the fishing vessels involved are complying with what they claim regarding the social policies? Who would be responsible for performing the validation checks e.g. MarinTrust, processing factory, trader, end user, certification bodies?	Committee review - SEC	The level of expectation will be covered in guidance. This will include the types of evidence that will be required, the level of communication between the facility and the vessel. The specific 'how' will be for each facility to determine but they must have evidence to show the auditor.
	It is noted that in the checklist there is no prison labour, and whilst it is understood why this might be in there, is it that the standard doesn't allow any prison labour? There is now a big scheme in the UK specifically that is promoting this for example. Or does the wording meaning no forced prison labour or prison labour without the workers having rights.	Committee review - SEC	Reject - Prison labour is covered in zero tolerance and by the issues that workers must choose employment freely and be able to sign their own work agreement.
	Noted that workers are to be paid for all hours worked but there is no comment on the actual number of hours worked. Are there limits?	Committee review - SEC and Guidance	Reject - this has been previously discussed in SEC and SSC. The agreement was to set hours as a requirement within the work agreement so a worker will know their expected hours and rest periods.
	The policy for discrimination does not seem to understand how this will be verified.	Committee review - SEC and Guidance	Accept in part - The level of expectation will be covered in guidance. This will include the types of evidence that will be required, the level of communication between the facility and the vessel. The specific 'how' will be for each facility

			to determine but they must have evidence to show the auditor.
	There is no real note of an official grievance policy for workers at all sites.	Guidance	this is in clause 7.6 for the facility.
	It's welcomed to see the enhancements made within V3 of the standard with regard to staff safety, welfare and working conditions. While the supplier and subcontractor approval guidance for factories has a requirement for fishing vessels supplying whole fish to have a social policy covering good social practice and human rights, there is no indication about what level of verification (if any) is undertaken? It may be that that level of verification of fishing vessels social policy is covered within the quality checks undertaken by the certification body, but if not, this is something that should be considered to enhance the level of assurance that the standard gives around social practices and human rights. As part of their quality control processes certification bodies will often check and verify the information provided in X% of audits conducted each year (1% is common in some large global run schemes). Having fishing vessels provide a self-declaration / policy on social practice and human rights is a great step, but without some level of verification of the details it contains there is potential gap within the robustness of this requirement.	Committee review - SEC and guidance	Accept in part - The level of expectation will be covered in guidance. This will include the types of evidence that will be required, the level of communication between the facility and the vessel. The specific 'how' will be for each facility to determine but they must have evidence to show the auditor. Avoid the use of over-prescribed requirements as these are likely to vary in countries, between cultures etc.
	welcomes the general strengthening of the standard on social issues, both for factory and fishing vessel	Not applicable	Positive feedback
Social risk assessment (the same method used for risk assessment in Sections 3 and Section 7)	<i>Copies of two risk assessment excel files have been received to compare the ASC and MarinTrust risk ratings. These build on comments provided in the factory clauses to align the MT and ASC risk methods feedback</i>	Committee review - SEC	Reject - given the MarinTrust risk assessment has been in place for 3 years and is acceptable, continue to use this as is. However this should be reviewed on an ongoing basis and compared with other risk assessment methods to explore equivalency options. This goes beyond ASC as there are many different risk assessment methods in use.
	Relates to country risk assessment for social in factories: make the list more extensive (what about for example Japan or other relevant countries?)	Guidance	This will be included

	Relates to country risk assessment for vessels: It is unclear which references have been used to risk evaluate countries. MarinTrust should make this clear so that calibration to other risk assessments and standards can be done.	Guidance	This will be more visible
	Relates to country risk assessment for vessels: The country risk classification is low, medium and high. The action required is the same for medium and high risk (no action required for low risk). Why then not use only low and high risk?	Committee review - SEC	Reject - as the risk assessment is used across several different areas, we retain the low, med, high ratings.
Section 8 Environmental	Regarding clauses related to environmental compliance, most of them are covered by EU regulations. Simplification for the evaluation of this section would also be welcome.	Committee review - SSC	Reject - reliance on equivalent standards is risky with official equivalency in place. Regulations are variable in different regions and they do not avoid the need to be audited against each clause.
Templates	note typo in TACCP/VACCP template: thread instead of threat	Minor edit - to action	Edited
Miscellaneous	Finally, we would be grateful if you could provide us information about the use of the MarinTrust Chain of Custody v2.0 when the new version of the MarinTrust Standard will apply. If any changes are made to this standard in the future, we would appreciate to be kept informed.	Not applicable	Does not result in any changes to V3 draft
	We are excited about the MarinTrust Standard Version 3, in particular the focus on the recycling of processing by-products and reducing environmental impacts being a key part of the new standard. The Fish In : Fish Out (FIFO) ratio has been considered a key metric for fed aquaculture, but most FIFO calculations do not acknowledge or consider by-product use in marine ingredients. Consequently, it does not reflect the benefits and potential improvements of the utilization of by-products, which is crucial to increase the efficient and sustainable use of valuable marine resources. In our view, making use of the whole fish needs to be made a more explicit part of sustainability thinking and communicated to stakeholders, especially retailers and consumers.	Not applicable	Does not result in any changes to V3 draft

	<p>The economic FIFO (eFIFO) metric addresses these issues, as it applies economic allocation to the co-production of fishmeal and fish oil and attributes a relatively higher impact to the more valuable product, reflecting socio-economic drivers of fisheries and processing (1). It avoids double counting of fish resources, while it also takes full consideration of fish by-products that are increasingly valued and used. Effective implementation of by-products in the circular economy requires industry “pull” as well as “push”. Economic allocation recognizes the lower value of fish by-products compared to the prime product. Using economic allocation gives a gradual transition as economic value is created by utilizing by-products in valuable industries, thus providing both push and pull.</p>	Not applicable	Does not result in any changes to V3 draft
	<p>Further, fishmeal and fish oil yield vary considerably between fish species and by-products resulting in different levels of embodied fish and consequently, marine ingredients also have variable environmental impacts between and even within species, mostly depending on the fuel intensity of the fishery from which they are sourced (2). In this regard, a comprehensive list of indicators and required data as described in the papers (1,2) enables the industry to comprehensively assess the eFIFO score and environmental impact and encourage the use of by-products. If adopted this would enable the aquaculture industry and others using fish by-products from different sources to communicate their sustainability practices more precisely and contribute to global food security and the economy, providing much needed nutritionally valuable seafood.</p>	Not applicable	Does not result in any changes to V3 draft