

# Procedure for Submission of Comments, Suggestions, and Information

## 1. Purpose

This procedure outlines how stakeholders can submit comments, suggestions and information that may be valuable to MarinTrust.

## 2. Scope

This document is intended for both internal and external use and covers procedures for submission of comments, suggestions, and information regarding any aspect of MarinTrust, including:

- The MarinTrust Standards (MarinTrust Factory standard, Chain of Custody) and Improver Programme
- MarinTrust's associated Assurance, Theory of Change and Monitoring, Evaluation & Learning systems.
- Certificate Holders and certification body (CB) performance

Procedures for complaints and appeals are dealt with separately in document A6 – Appeals and Complaints Procedure for the MarinTrust Programme.

A separate procedure exists for comments and suggestions related to revisions of MarinTrust Standards. Please refer to C2 – Standard Development Procedure.

## 3. Terms and Definitions

**Stakeholders** include fishery participants (fishers), fish processors, fish traders, government fishery management organisations, factories, supply chain actors, non-government organisations and any other parties or persons that may have important information to support MarinTrust's standard requirements, processes and associated assurance system design, or achievement of MarinTrust's objectives.

**Complaints** are formal expressions that something related to the MarinTrust programme is incorrect or unsatisfactory.

**Appeals** relate to decisions, either certification or accreditation decisions.

## 4. Stakeholder Engagement

The MarinTrust Assessment and Certification Process follows ISO/IEC 17065 requirements and includes a comprehensive stakeholder engagement.

MarinTrust actively engages with the public during the standards Review Phase and Standards Development Phase in the format of an open comment period in line with the document C2 – Standard Development Procedure.

### 4.1 Stakeholder input on MarinTrust Standards

A separate process (with comprehensive stakeholder engagement) exists for periodic full revisions of MarinTrust Standards. Please refer to C2 – Standard Development Procedure. However, comments and suggestions are welcome at any time outside of the revisions and review processes and should be sent to [standards@marin-trust.com](mailto:standards@marin-trust.com).

### 4.2 Stakeholder input on MarinTrust’s Assurance System, Theory of Change, and Monitoring, Evaluation & Learning (MEL) systems.

MarinTrust welcomes comments on the MarinTrust Assurance System, and MEL system, submitted by any interested party at any time, and considers them during subsequent relevant reviews and revisions of Standards, Quality Management Systems, MEL system, etc. These comments may relate to any aspect of the MarinTrust Programme. Please contact [standards@marin-trust.com](mailto:standards@marin-trust.com).

### 4.3 Stakeholder input on certificate holders and CB Performance

Gathering additional stakeholder input about the assurance system beyond the complaints mechanism strengthen the credibility of the assessment and provides useful information to support assurance system improvements.

Stakeholders are therefore able to provide input on certificate holder and certification body performance as follows:

- 4.3.1** MarinTrust does not publish audit reports conducted on behalf of the programme due to the sensitive business information. However, MarinTrust welcomes comments on certificate holder and Improver Programme Accepted site performance at any point after the initial audit process. All certificate holders and Improver Programme Accepted sites can be found listed on the MarinTrust website

**4.3.2** MarinTrust welcomes comments on CB Performance at any point after the formal registration of a CB to the MarinTrust Programme. All registered CBs can be found listed on the MarinTrust website. MarinTrust conducts an annual audit of all registered CBs and takes into consideration all comments, suggestions, and information submitted by stakeholders.

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## 5. How to make a submission

Stakeholders should submit any relevant information via email to the MarinTrust Secretariat directly at [standards@marin-trust.com](mailto:standards@marin-trust.com).

Where submissions are not possible via email letters may be sent to the office address directed to the MarinTrust Secretariat at:

### **Marine Ingredients Certification Ltd**

Unit C, Printworks  
22 Amelia Street  
London  
SE17 3BZ  
United Kingdom

The Assurance Officer or delegated/responsible person shall acknowledge receipt of the comments, suggestions, and/or information within five (5) working days, and may contact the stakeholder for further information or clarification as needed.

## 6. Records

The Assurance Officer, or delegated/responsible person, will check whether the submission is related to MarinTrust Programme, Certification Body, Certificate Holder etc.

All comments, suggestions, and/or information, shall be recorded in the *Complaints, Comments, and Suggestions* log.

All documentation regarding the submission (including email correspondence) shall be stored in the complaints, comments suggestion folder located under the assurance folder. **In some instances, submission of comments, suggestions or information may come from MarinTrust internal staff. In such cases, these internal observations shall be recorded in the comments and suggestion log and noted as internal observations.**

**During review of procedures, the reviewer shall check the comments and suggestion log for comments, suggestions, or information related to the procedure.** The comments or suggestions received shall be considered and incorporated where necessary.

The Assurance and Risk Manager, CEO and delegated/responsible person will be responsible for reviewing the comments and suggestions at least on an annual basis for consideration and where applicable for discussion with relevant MarinTrust Governance Body Committee.

MarinTrust shall provide feedback to stakeholders on how their comments were taken into consideration where necessary.

## AMENDMENT LOG

DATE	ISSUE	AMENDMENT	AUTHORISED BY
13/11/2015	1.1	IFFO RS logo heading, footer.	Francisco Aldon
27/11/2017	1.7	Update of wording throughout the document from “assessment” to “audit”.	Francisco Aldon
27/11/2017	1.7	Deletion of “Length of the On-site” has been deleted from point 6.0, second paragraph	Francisco Aldon
27/11/2017	1.7	Update of all of the levels of non-conformity in section 6.0, Audit procedures	Francisco Aldon
27/11/2017	1.7	Updating of section 8.0 Audit Frequency to ensure that it is clear the frequency and length of an audit is not on a risk based term.	Francisco Aldon
27/11/2017	1.7	Rewording of “21 working days” to “28 calendar days” I section 10.0 Non-conformance follow up.	Francisco Aldon
27/11/2017	1.7	Section 11.0, fifth paragraph, rewording of paragraph to “shall also be sent to the IFFO RS Standards Administrator and or IFFO RS secretariat with the same time period of no longer than 3 working days after the Certification Meeting. The Head of Operations shall use these audit reports for standard consistency monitoring purposes also.”	Francisco Aldon
27/11/2017	1.7	Section 11.0, final paragraph, change from “The applicant paying for the assessment shall be regard as the applicant” to ‘The main contact as indicated in the IFFO RS application form	Francisco Aldon
27/11/2017	1.7	Rewording of final paragraph in section 8.0 to “In some cases, where the marine ingredient is not produced continuously, the Re-certification audit shall take place while the factory is producing”	Francisco Aldon
<b>Version 2 edits (MarinTrust conversion)</b>			
12/03/2021	2.0	MarinTrust Header & Footer inserted	Libby Woodhatch
12/03/2021	2.0	Reference of IFFO RS amended to MarinTrust throughout document where applicable	Libby Woodhatch
12/03/2021	2.0	Update of purpose and scope to encompass submission of comments,	Libby Woodhatch

		suggestions and information across the MarinTrust programme.	
12/03/2021	2.0	Removal of section 1.2 Stakeholder input on fisheries and factories. This is instead captured as part of the assessment and audit activities.	Libby Woodhatch
12/03/2021	2.0	Removal of section 1.4 Eligibility criteria. This is now outlined in section 3. Who are Stakeholders.	Libby Woodhatch
12/03/2021	2.0	Addition of section 4 to outline specific guidance on the submission of comments relating to the MarinTrust Standard Requirements, and MarinTrust wider assurance system.	Libby Woodhatch
27/06/2022	3.0	Addition of the intention of the scope of the document for internal and external use and Certificate holders and CB performance.	Libby Woodhatch
27/06/2022	3.0	<b>Moved the statement “Complaints</b> are formal expressions that something related to the MarinTrust programme is incorrect or unsatisfactory. <b>Appeals</b> relate to decisions, either certification or accreditation decisions.” From section 2 to section 3.	Libby Woodhatch
27/06/2022	3.0	Removed the wording <i>Who are stakeholders?</i> and replaced with <i>Terms and Definitions</i> .	Libby Woodhatch
27/06/2022	3.0	Addition of <i>4.3. Stakeholder input on certificate holders and CB Performance</i>	Libby Woodhatch
27/06/2022	3.0	Clause 6.3.2. Specific timeframes included on exactly at which point in the process input may be provided.	Libby Woodhatch