



Complaint, Dispute, and Appeal Resolution Procedure

Document PRO-006 (prev. A6) – Version 2.1

Issued October 2025 – Effective November 2025

Prepared by: MarinTrust

Reviewed by: Technical Assurance Committee

Approved by: Governing Body Committee

1. Purpose

Wherever possible, in a spirit of partnership and common goals, attempts should be made to resolve all dissatisfactions and concerns in an open, positive and courteous manner.

This procedure defines how complaints, disputes and appeals related to the MarinTrust Programme are formally responded to, when necessary, in a way that is impartial, transparent, and open and accessible to all stakeholders. This procedure also sets out how confidentiality is ensured when requested or necessary.

All Certification Bodies (CBs) are required to be compliant with ISO 17065 and to maintain a complaints and appeals process, as set out in ISO 17065.

All Accreditation Bodies (ABs) are required to be compliant with ISO17011 and to implement complaints and appeals processes as set out in ISO 17011.

2. Scope and Terms

This procedure covers a specific set of complaints, appeals, and disputes.

Complaints are expressions of dissatisfaction, that may be raised by any stakeholder, related to any part of the MarinTrust Programme. This includes implementation of the MarinTrust Programme itself, e.g. a complaint about use of a MarinTrust logo or claim.

Disputes are complaints raised by applicants, certificate holders, stakeholders and implementing partners such as assurance providers.

Appeals usually relate to a decision to grant, suspend, or withdraw certification or approval, and may only be made by those directly affected by a certification, approval or decision,

Note that a **grievance** refers to a complaint raised by staff, consultants and those on decision-making bodies, and is covered by a separate MarinTrust Grievance Procedure.

Unless otherwise stated, '**certificate holder**' (CH) should be taken to include any accepted applicants for certification.

2.1 Other information, concerns, and comments

In addition to formal complaints, disputes, and appeals, MarinTrust is always open to relevant suggestions, information, concerns and comments, including on its standards programme and associated assurance. Please contact via email at standards@marin-trust.com. Where submissions are not possible via email, letters may be sent to the office address: MarinTrust Secretariat, Unit C, Printworks, 22 Amelia Street, London, SE17 3BZ, United Kingdom.

MarinTrust also has a whistleblower policy.

3. Complaints

- Complaints may be about:
 - A certificate issued by an approved CB or a CH.
 - An registered CB.
 - A government-assigned AB.
 - An auditor involved in relevant certification processes.
 - The MarinTrust standard programme and associated assurance.
 - Use of a MarinTrust claim or logo.

3.1 Complaints about a registered Certification Body, a certificate issued by a registered Certification Body, a Certificate Holder, or an auditor involved in relevant certification processes

- Complaints may be submitted by any stakeholder.
- In the first instance the complainant should contact the CB directly.
- Complaints concerning a certificate or the conduct of a CH shall be referred directly to the CB's Programme Manager/Administrator who will inform the CB's senior management team. The CB will contact the CH concerned for additional information and clarification as necessary.
- Complaints may be received by either written or verbal means. However, verbal complainants will be requested to submit a written complaint. For complaints received by telephone, the call will be noted on the CB's complaints register and the caller also requested to submit a written complaint. Complaints received in writing shall form the basis of the complainant's file.
- The CB, on receipt of a complaint will raise a Complaint Form and attach this to the written complaint and/or copy of telephone log of the complaint and allocate a Complaint Number. Details of the complaint, name and contact details of the complainant and the date received will be recorded in the Complaints Register by the CB's Certification Systems Manager or equivalent and copied to the Senior Management Team of the CB.
- The CB will acknowledge the complaint in writing within 5 working days and allocate responsibility for investigation and action.
- The CB will allocate a nominated Senior Manager to monitor the progress of the complaint investigation through to closure. This nominated manager will keep the complainant fully informed of the anticipated timescale to complete the complaint investigation. Where this involves formation of a Review Panel the complainant shall be informed of this and the anticipated timescale.

- The complainant shall be updated on the progress, outcome, and decision of the complaint investigation within a reasonable timeframe, which shall be no longer than 21 working days.

On completion of the complaint investigation, the outcome will be signed off by the CB's Chief Executive Officer and recorded in the CB's Complaints Register. The nominated Manager will advise the complainant and MarinTrust in writing of the outcome, including any necessary corrective actions.

The CB will keep a record of all complaints and resulting actions for at least five years.

- The CB will on a regular basis publicly report a summary of all complaints and resulting actions, ensuring confidentiality if requested or where wise to do so.
- A review of the Complaints Register and status of outstanding complaints and corrective actions will be subject to regular audit as part of the CB's Internal Audit Programme and will be included in the CB's Quality System and Management Review Reports.
- If the complainant is not satisfied with the conduct or outcome of the CB's investigation, they may refer the complaint to the MarinTrust CEO where it will be considered on a case-by-case basis. This may include setting up an independent Complaint Panel.

3.2 Complaints about an Accreditation Body

- Complaints may be submitted by any stakeholder.
- In the first instance the complainant should contact the AB directly.
- The AB shall decide on the validity of the complaint, and take effective actions and assess their effectiveness, record all complaints and actions taken, and respond to the complainants.
- If not satisfied after referring the complaint to the AB, the complainant has the option of referring the complaint to the MarinTrust CEO or Executive Chair where it will be considered on a case-by-case basis. This may include setting up an independent Complaint Panel.

3.3 Complaints about the MarinTrust programme, associated assurance, or about use of a MarinTrust claim or logo

- Complaints may be submitted by any stakeholder.
- All complaints regarding the requirements, processes or activities of the MarinTrust programme, associated assurance system, or use of a MarinTrust claim or logo shall be made in writing and directed to the MarinTrust CEO. The MarinTrust CEO will determine how best to proceed, including escalation to the Executive Chair of MarinTrust if deemed appropriate.
- MarinTrust will acknowledge receipt of the complaint within 5 working days and where of sufficient importance will discuss the complaint with the MarinTrust Board or Governing Body

Committee.

- MarinTrust will contact the complainant by writing regarding the progress, outcome and decision of MarinTrust in relation to the complaint raised within a reasonable timeframe, which shall be no longer than 21 working days.
- An annual report of complaints received, the status of outstanding complaints, and corrective actions will be provided to the MarinTrust Board.
- All stakeholders are encouraged to engage with periodic revisions to the MarinTrust Standard. Document C2 – Standard Development Procedure.

3.4 Record keeping, confidentiality and public information.

- MarinTrust will keep a record of all complaints and resulting actions for at least 5 years.
- MarinTrust will on a regular basis publicly report a summary of all complaints and resulting actions, ensuring confidentiality if requested or where wise to do so.

4. Appeals

4.1 Appeals

- Appeals may be regarding:
 - A certification decision related to a CH.
 - An approval decision related to a CB.

4.2 Appeals regarding a Certification Decision

- Appeals may be submitted only by the CH.
- All appeals should be submitted in the first instance to the CB.
- Registered CBs shall have strict guidelines on what should be included in an Appeal Procedure related to a Certification Decision that they have made.
- The process is as below. Any deviation from this process must be discussed and approved in advance by the MarinTrust Governing Body Committee.
 - A CH shall have the right of appeal against decisions made within the CB Certification Process.
 - Appeals shall be made in writing by the CH to the CB initially, within 14 calendar days of being advised of the decision that they wish to appeal.
 - The CB will acknowledge the appeal within 7 calendar days and shall have the right to conduct initial investigations to check the merits of the appeal.

- The CB shall appoint a Senior Manager to oversee the appeal investigation and if they agree with the appeal then the CB will correct the erroneous decision.
 - If within 28 days of receipt of a written appeal the appointed Senior Manager does not concur with the appeal or a mutually acceptable resolution cannot be agreed with the CH then an Appeal Panel, which can include a MarinTrust representative, is convened by the CB to handle the appeal.
 - The CB, including their Programme Manager, a MarinTrust representative and the appellant are entitled to attend the Appeal Panel and present information to the Panel.
 - The Appeal Panel shall be independent and will make its ruling on the information supplied during the hearing.
 - The Appeal Panel will convene within one calendar month of the receipt of the appeal.
 - The ruling of the Appeal Panel is binding and final on the CB and the appellant.
- The CB will keep records of all appeals, final decisions and follow-up actions taken, for at least five years.

4.3 Appeals regarding an Accreditation Decision

- Appeals may be submitted only by the CB.
- All appeals should be submitted in the first instance to the AB.
- The AB will follow a procedure as required by ISO 17011. This will comprise:
 - appointing a person or group to investigate the appeal who are competent and independent of the subject of the appeal.
 - Deciding on the validity of the appeal, advising the CB of the final decision of the AB, taking follow-up action where required, and keeping records of all appeals, final decisions and follow-up actions taken.
- If not satisfied after referring the complaint to the AB, the complainant has the option of referring the complaint to the MarinTrust CEO where it will be considered on a case-by-case basis

5. Records

- All complaints, disputes and appeals received by MarinTrust in relation to the MarinTrust Standards and Assurance Programme shall be recorded in the Complaints, Disputes and Appeals Register.
- The Complaints, Disputes and Appeals Register and copies of correspondence relative to complaints will be made accessible for Internal Audit and to authorised external agencies.

- CBs and ABs shall follow their own complaints and appeals in accordance with their internal complaints and appeals procedures.

6. Anonymity and Whistleblowing

- Registered CBs are required to maintain a whistleblowing policy.
- MarinTrust also maintains its own whistleblowing policy.

AMENDMENT LOG

DATE	ISSUE	AMENDMENT	AUTHORISED BY
Version 2 edits (MarinTrust conversion)			
18/03/2021	2.0	MarinTrust Header & Footer inserted	Libby Woodhatch
18/03/2021	2.0	Reference of IFFO RS amended to MarinTrust throughout document where applicable	Libby Woodhatch
18/03/2021	2.0	Refining and update of 'Scope' and specific inclusion of references to Accreditation Bodies.	Libby Woodhatch
18/03/2021	2.0	Addition of section 3.1 Other information and comments	Libby Woodhatch
18/03/2021	2.0	Inclusion of defined specific sections to cover complaints and appeals in different instances outlined in the scope of the document.	Libby Woodhatch
18/03/2021	2.0	Update of Records, Section 5, to reflect current practice	Libby Woodhatch
18/03/2021	2.0	Addition of section 6, Anonymity and Whistleblowing.	Libby Woodhatch
08/04/2025	V 3.0	Title changed from 'Appeals and complaints procedure' to 'Complaints, dispute and appeals resolution'.	Governing Body Committee
08/04/2025	V 3.0	Addition to section 3: Complaints may be about use of a MarinTrust claim or logo.	Governing Body Committee
08/04/2025	V 3.0	Section 2 – scope and terms: Addition of further clarification to the definition of complaints and appeal.	Governing Body Committee
08/04/2025	V 3.0	Addition of new term – dispute throughout.	Governing Body Committee
08/04/2025	V 3.0	2.1: Addition of MarinTrust contact information.	Governing Body Committee
08/04/2025	V 3.0	Change from 'approved' to 'registered' CB throughout.	Governing Body Committee
08/04/2025	V 3.0	Change from 'approved AB' to 'government -assigned AB'.	Governing Body Committee

08/04/2025	V 3.0	3.1: Addition of corrective actions as part of the information to be included in the complaint outcome where necessary. To clarify that MarinTrust should be informed about the outcome of the complaint.	Governing Body Committee
08/04/2025	V 3.0	3.1: Addition of timeframe for keeping record of complaints and resulting actions.	Governing Body Committee
08/04/2025	V 3.0	3.1 Addition of information on reporting summary of complaints publicly ensuring confidentiality.	Governing Body Committee
08/04/2025	V 3.0	3.1: Inclusion of Information about MarinTrust reviewing CB's complaints register and status of outstanding complaints and corrective actions during audits.	Governing Body Committee
08/04/2025	V 3.0	3.3: Inclusion of complaints about the use of a MarinTrust claim or logo.	Governing Body Committee
08/04/2025	V 3.0	Addition of timeframe for providing complainant with progress, outcome and decision of complaint.	Governing Body Committee
08/04/2025	V 3.0	4.2: Addition of timeframe for: - acknowledging receipt of an appeal. - to refer the appeal to an Appeal Panel. - for keeping record of appeals and resulting actions.	Governing Body Committee