



MarinTrust Programme Standard Development and Revision Procedure

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Contents

2	Purpose & Scope	4
3.	Terms and Definitions	4
4.	Internal Governance Roles	5
5.	Terms of Reference for MarinTrust Standard Development or Revision	6
5.1	ToR elements	6
5.2	Development of the ToR.....	7
6.	Standard Development Procedures for the Drafting of New or Revised Standards.....	7
6.1	General requirements	7
6.2.	Approval and dissemination of new or revised standard.....	8
7.	Public Consultation Process	9
7.1.	General requirements	9
7.2.	Development of a new standard	9
7.3.	Revision of an existing standard	10
8.	Urgent Revision to Standard	11
9.	Non-substantive Change to Standards:.....	12
10.	Records	12
11.	Standard-setting Procedure Review	12
12.	Publicly available information.....	13

1. Introduction

The MarinTrust Programme has been in existence since 2009 and is the leading independent business to business certification programme for the production of marine ingredients. The programme consisting of three main elements; The MarinTrust Standard, the MarinTrust Chain of Custody Standard (CoC), and the MarinTrust Improver Programme (IP).

The mission of the MarinTrust Programme as agreed by the MarinTrust Governing Body Committee (GBC) is based on the following three key pillars:

- **Responsible Sourcing:** of fishery material (non IUU) from fisheries that comply with the key principles of the FAO Code of Conduct for Responsible Fisheries.
- **Responsible Traceability:** of marine ingredients back to fisheries that are compliant with this Standard.
- **Responsible Production:** of safe marine ingredients in a safe working place.

The key objectives of the MarinTrust Programme are to ensure:

- That whole fish used come from fisheries managed according to the FAO Code of Conduct for Responsible Fisheries.
- No Illegal, Unreported and Unregulated (IUU) fishery materials are used.
- Pure and safe products are produced under a recognised Quality Management System, thereby demonstrating freedom from potentially unsafe and illegal materials.
- Full traceability throughout production and the supply chain.
- All other raw material, fishery and aquaculture by-products used can be traced back to their source fishery and farm.
- Fish by-products or trimmings used in MarinTrust Compliant Marine Ingredients do not come from fish species that are classified as endangered on the International Union for Conservation of Nature (IUCN) list and are derived from fish intended for direct human consumption.
- Certified facilities commit to having Environmental and Social Policies in place and enforced.

The MarinTrust Programme Chain of Custody Standard is designed to protect the product integrity and providence of all labelled MarinTrust Compliant Fishmeal and Fish Oil as it passes through the Global Supply Chain.

In order to assure that the MarinTrust Programme remains at the forefront of Marine Ingredients (Fishmeal and Fish Oil) sourcing and production, the MarinTrust Secretariat is committed to review and enhance the Programme's standards in accordance with this procedure in order to maintain the credibility of the programme, and to meet with the expectations of the Marine Ingredient manufacturing sector and the global supply chain.

MarinTrust standards shall be subject to an annual review and a full revision of each standard shall take place at least once every 5 years. These processes shall consider the continued relevance of the intended sustainability impacts and strategies, and the standard's effectiveness.

If, following a standard's review it is determined that a revision is not necessary, MarinTrust shall reaffirm the standard and communicate this decision and the rationale and establish next date for next revision.

2 Purpose & Scope

The primary purpose of this document is to safeguard the credibility of MarinTrust programme by ensuring consistency in the standard development and revision processes through defined procedures.

This document therefore outlines the steps that are required to be followed by MarinTrust when scoping out and conducting a standard review and revision in relation to all MarinTrust standards within the MarinTrust Programme. It shall cover all areas required to set and develop a new standard as well as review and revision requirements for the existing standards. This document also sets out the schedule and process for non-substantive changes and for urgent changes.

3. Terms and Definitions

In order to maintain consistency and understanding, some of the terms used within this procedure are defined below.

Accreditation: A process by which an authoritative body gives formal recognition of the competence of a Certification Body to provide certification services against an international standard e.g. ISO 17065. For MarinTrust, this must include a current and active application with the Accreditation Body (AB) for an extension to their current accreditation scope against ISO/IEC 17065:2012 to include the relevant MarinTrust Standard.

Certification Requirements Procedure: The procedure by which an accredited and registered Certification Body gives written or equivalent assurance that a product, process or service conforms to the relevant MarinTrust Standards' requirements.

Certification Body (CB): A provider of certification services, accredited by an AB and approved by MarinTrust.

Chain of Custody: The set of measures that verify that a certified product originates from a certified aquaculture production chain and is not mixed with non-certified products. Chain of custody verification measures should cover the tracking/ traceability of the product all along the production, processing, distribution and marketing chain, the tracking of documentation, and the quantity concerned.

Consensus Decision-Making: A decision-making process that not only seeks the agreement of most participants, but also resolves or mitigates the objections of the minority in order to achieve the most agreeable decision.

Consultation Process: An active and important process in which MarinTrust opens formal and informal communication channels with its stakeholders.

Secretariat: The office or people responsible for the management of MarinTrust.

Stakeholder: Any person, organisation, social group, or society at large that has a stake in or is affected by the marine ingredients business. Stakeholders can be internal or external to the marine ingredients business.

Standard Document: A set of requirements, etc. established by MarinTrust that provides, for common and repeated use, rules, guidelines or characteristics for products or related processes and production methods, with which compliance is not mandatory under international trade rules.

Standard Development Procedure: The procedure followed when developing documents set to become MarinTrust Standards.

Standard Review: The development, review, and approval process for a MarinTrust Standard.

Standard Terms of Reference: A document that defines all aspects of how MarinTrust will develop a new standard or conduct a review and revision of a standard within the MarinTrust Programme. It also defines the objectives and the scope of the standard review and revision.

Third party certification: The procedure by which an independent CB which is not involved in standards setting or has any other conflict of interest, analyses the performance of involved parties, and reports on compliance. This is in contrast to first party certification (by which a single company or stakeholder group develops its own standards, analyses its own performance, and reports on its compliance and second party certification (by which an industry or trade association or NGO develops standards, analyses the performance of involved parties, and reports on compliance).

Traceability: The ability to follow the movement of a product of fisheries or aquaculture or inputs such as feed and seed, through stages of production, processing, transport, and distribution.

4. Internal Governance Roles

The following groups are involved in the standard setting process and fulfil the roles described:

- **The MarinTrust Governing Body Committee (GBC)** makes the approval decision on the scoping, setting and development of a new standard or revision of an existing standard. The GBC takes the final decision on new and revised standard approval by consensus decision making prior to publication.
- **The MarinTrust Technical Assurance Committee (TAC)** provides support on the development, revision, and implementation of a credible and robust assurance system for a global certification programme for the marine ingredients industry, which will provide assurance to the global supply chain that all certified sites to this programme source and produce marine ingredients responsibly
- **The MarinTrust Standard Steering Committee (SSC)** provides support on the development and revision of a credible and robust certification standards for the Marine Ingredients industry and to

develop and maintain the technical certification specifications for the certification criteria and technical guidance used during MarinTrust audits to confirm their relevance to current practice and market requirements for approval by the GBC.

- **The MarinTrust Social and Ethical Committee (SEC)** supports the development and implementation of credible, robust, and realistic criteria focusing on human rights and social welfare within the MarinTrust Programme.
- **The MarinTrust Secretariat** arranges and facilitates the process of the development of a new standard or revision of existing standards which includes the planning of the process and development of content.

5. Terms of Reference for MarinTrust Standard Development or Revision

For a new standard a new Terms of Reference (ToR) is developed. For revision of an existing standard the current ToR (where applicable) shall be updated.

At the outset of a new standard development or revision process, MarinTrust develops or updates ToR which include at least the following elements:

- Proposed scope of the standard and intended geographic application.
- Clear objectives that the standard seeks to achieve and how those are linked to MarinTrust's intended impacts and strategies.

5.1 ToR elements

The ToR shall include at least the following elements.

- Justification for the need of the new standard or revision, including where appropriate reference to existing external Standards with overlapping scopes.
- Defined objectives including sustainability outcomes, impacts and strategies for the new standard or revision.
- The proposed scope of the new standard or revision.
- The purpose of the scope of the new standard or revision and its intended geographical application.
- An impact assessment of risks in implementing the new or revised standard and how to mitigate these for current certificate holders.
- Clear reference to the social, environmental, and economic objectives of the new or revised MarinTrust Standard, and how these are consistent with MarinTrust's intended impacts and strategies.
- Means to ensure:

- The new or revised standard facilitates appropriate sustainability claims.
- The requirements in the Standard are auditable, verifiable, or measurable, and easily understood
- The Standard contains requirements that address all of the Standard's intended sustainability outcomes
- Only requirements that are relevant to meeting these outcomes are included, and administrative requirements related to assurance, claims or labels or other matters not connected to sustainability outcomes are presented separately.
- Requirements are at least as stringent as existing regulatory requirements in the locations where the Standard is applied.
- The intellectual source of content is attributed or cited, where relevant.

5.2 Development of the ToR

- A draft ToR shall be created by the MarinTrust Secretariat and presented to the SSC for review, comment, and approval. This shall include an assessment of opportunities to strengthen alignment or complementarity with external Standards with overlapping scopes.
- The draft ToR shall be presented to the MarinTrust GBC for approval.
- The draft ToR (including proposed scope and intended objectives and sustainability outcomes) shall be placed in public consultation available to all stakeholders and interested parties, including via the MarinTrust website, to seek input from those directly and indirectly affected by the proposed new standard or revision, using the public consultation process stated within this procedure.
- Comments received from public consultation shall be considered and incorporated where necessary.
- The final ToR shall be presented to the MarinTrust GBC for approval and sign off.
- Upon sign off, the decision to carry out the development of a new standard or revisions to an existing standard.
- Complaints regarding the scope of the new or revised Standard in this context shall be considered as part of the feedback and shall be recorded and managed in accordance with the public consultation process.

6. Standard Development Procedures for the Drafting of New or Revised Standards

6.1 General requirements

- At the outset of any new standard development or substantive Standard revision MarinTrust shall make easily accessible to stakeholders an outline of the steps and timelines in the

process and opportunities for contributing as well as the decision-making procedure and responsibilities.

- At the outset of any new standard development or substantive standard revision MarinTrust shall identify external Standards with overlapping scopes and shall assess opportunities to strengthen alignment and complementarity. This assessment shall be provided to the MarinTrust Standards Steering Committee (SSC) and GBC.
- Drafts of new or revised Standard requirements and/or certification (interpretation) requirements shall be developed by MarinTrust Secretariat, with Programme consultants if required, prior to and following stakeholder feedback.
- All drafts of the new or revised standard and/or certification requirements shall be presented to the TAC for technical review and development, or a bespoke TAC/working group if the technical competencies required for the new or revised standard are outside of the scope of the current members of the TAC.
- All drafts of the new or revised standard and/or certification requirements shall be pilot tested with registered CBs to ensure that Standard requirements are auditable and can maintain the accreditation of the certification procedures used by the MarinTrust approved CBs.
- All amendments to a new or revised Standard and/or certification requirements shall be approved by the SSC followed by GBC approval, including checks that the ToR have been met, prior to public consultation.
- The public consultation shall be conducted using the Public Consultation Procedure as in Section 8 of this document.

6.2. Approval and dissemination of new or revised standard

- Any amendments to the new or revised Standard and/or certification requirements following public consultation shall be approved by the SSC prior to sending to the GBC.
- The GBC shall review the new or revised Standard and/or certification requirements, including checks that the ToR have been met, and if a positive consensus decision is made, the new version of the Standard or certification requirements shall be approved.
- The new and revised Standard and/or certification requirements shall be communicated to existing certificate holders, CBs, and ABs directly, and placed on the MarinTrust website, clearly indicating the date when the new and revised Standard and/or certification requirements shall come into force.
- A transition period to allow existing certificate holders to be capable of complying with the new or revised standard shall be approved by the GBC and publicised on the MarinTrust

website with the new and revised standard. A transition period shall have a predetermined end date stipulated.

- Translations of the new or revised Standard and/or certification requirements shall be made publicly available by MarinTrust to all stakeholders directly or indirectly affected by the new or revised Standard
- Revised training materials and sign off procedures shall be used to ensure that all auditors used by the CBs are fully competent to assess and score the new or revised standard and/or certification requirements.

7. Public Consultation Process

7.1. General requirements

- This MarinTrust Public Consultation Process shall be followed when carrying out public consultation for the development of new Standard development or the revision of an existing Standard.
- Public consultation shall be open to all stakeholders and interested parties.
- The MarinTrust Secretariat shall be proactive in obtaining stakeholder engagement by conducting a stakeholder mapping process in advance of a public consultation to ensure that all affected stakeholders (including new and interested stakeholders) have an opportunity to comment. Then by analysing the responses received shall identify any underrepresented groups and develop means to facilitate their engagement.
- Following each consultation process, MarinTrust shall provide feedback to stakeholders on how their comments were considered. A summary document outlining all attributed comments and how they were addressed shall be made publicly available and shared with all contributing stakeholders. Any unattributed comments shall also be appended to the summary.
- Comments shall be noted by interest sector of the contributor, but individual or group names shall never be incorporated. Commercially sensitive and defamatory comments shall be removed.

7.2. Development of a new standard

- For the development of a **new Standard** there shall be two rounds of public consultation;
 - The first round of Public Consultation shall last 30 calendar days.
 - The second consultation shall last 60 calendar days on the draft Standard requirements.

- MarinTrust as part of this consultation shall gather further input on substantive unresolved issues.
- Where substantive, unresolved issues persist after these consultation rounds, or where insufficient feedback was received, the GBC shall be consulted to discuss and decide if the MarinTrust Secretariat shall carry out additional rounds of consultation.
- Key stakeholders shall be proactively contacted to contribute to the consultation, in particular those who are typically under-represented such as small producers and developing country stakeholders, and those who will be directly affected or disadvantaged by any change.
- Organisations that have developed related standards shall be encouraged to participate, and this engagement shall be documented.

7.3. Revision of an existing standard

- The revision of an existing Standard will take account of:
 - MEL activities, including assessments of the effectiveness of the Standard, client sustainability performance, and occurrence of unintended negative effects.
 - assessments of clients' conformity to or performance against the Standard.
 - analysis of feedback received from clients, assessment personnel and other stakeholders, particularly with respect to the Standard's effectiveness, implementation, and scope
 - any urgent substantive revisions implemented since the last revision of the Standard
 - external research and industry best practices, including assessments of emerging sustainability risks and opportunities
 - changes to relevant legislation across the full scope of the Standard.
- There shall be at least one round of public consultation for the revision/amendment of **existing Standard requirements**, with a second round required if:
 - Substantive changes have been made since the first draft, or
 - There are substantive unresolved issues, or
 - Feedback from the first round is deemed insufficient.
- Public consultation shall include making stakeholders aware of any non-substantive changes and any urgent changes made since the Standard was developed or since the last substantive revision.
- The duration of first and second consultations on a revision of existing Standard requirements shall be at least 30 days.
- All amendment proposals to the draft Standard requirements or certification requirements shall be presented to the SSC for decision, and any decision to reduce or remove the second round of consultation shall be noted and justified in writing.

- Where substantive, unresolved issues persist after two rounds of consultation, or where insufficient feedback was received, the GBC shall be consulted to discuss and decide if MarinTrust secretariat shall carry out additional rounds of consultation.

8. Urgent Revision to Standard

The MarinTrust GBC, upon recommendation by the SSC, shall determine whether there is a need for an urgent revision to a Standard.

Conditions under which an urgent revision can be triggered may include, but are not limited to:

- a) Formal complaints raised by stakeholders that are deemed to have merit;
- b) Problems of implementation which affect multiple organisations;
- c) Perceived threats to MarinTrust's credibility or reputation;
- d) Changes in legislation or international obligations that affect the implementation of the standard.
- e) Changes to the operational practices in the sector relevant to the Standards, including significant change in supply chain requirements.
- f. Occurrence of unintended negative effects of the Standard.

Where MarinTrust secretariat believes that there is a need for urgent revision to a Standard, MarinTrust secretariat shall prepare a paper outlining the justification for the proposed urgent revision (including impact on the MarinTrust Programme) and shall submit it to the SSC and the GBC for approval.

If the GBC determines that there is a need for an urgent revision it shall direct the MarinTrust Secretariat to draft a proposed change and submit it to the MarinTrust SSC for recommendation for approval.

Upon recommendation for approval by the SSC, MarinTrust Secretariat shall then share proposed change with the MarinTrust GBC for approval.

If the GBC determines that an urgent revision is not required, it shall provide reasons for the decision and shall direct the MarinTrust Secretariat as to alternative measures that it considers to be appropriate.

Urgent revisions shall not be required to undergo a public consultation process. However, any approved urgent revisions shall be included in the subsequent regular MarinTrust Standard revision and consultation process.

Upon GBC approval of an urgent revision, a new version number of the MarinTrust Standard shall be created along with an effective date, and this MarinTrust Standard shall be published on the MarinTrust website and announced to MarinTrust stakeholders.

Records of all these steps shall be maintained and posted on the MarinTrust website to ensure that all stakeholders fully understand the process that has been adopted which has or has not invoked an urgent review of the standards within the MarinTrust programme.

9. Non-substantive Change to Standards:

The MarinTrust Secretariat shall instigate an annual review of all MarinTrust standards and certification requirements as part of its document control procedure within the MarinTrust Quality Management System (QMS). This procedure stipulates what changes can be authorised by the secretariat without the need to escalate to the GBC for approval. These changes include correction of spelling, grammatical errors, changes to generic forms designed to capture data e.g. application forms.

Any amended Standard, certification requirements documents shall be reissued on the MarinTrust website and within the MarinTrust QMS, with translations provided as appropriate.

10. Records

For each Standard review and development process the following records are retained:

- The ToR for the process.
- The ToR for MarinTrust governance bodies (GBC, SSC, any relevant bespoke Working Group).
- Synopses of public consultation comments, and MarinTrust's responses.
- Stakeholder participation monitoring and feedback.
- The draft standards and certification requirements.
- Decision and justification for either shortening or lengthening elements within the Public Consultation Procedure.
- Announcements (e.g. press release) for launching the Standard Review and Development processes, each Public Consultation, the launch of the new or revised Standard, and the transition arrangements for current certificate holders to the new or revised Standard.
- Minutes of meetings of the governance bodies (GBC, SSC, Bespoke SSC/Working Groups).

For the purpose of full transparency, all records shall be made available on the MarinTrust website for a minimum of 3 years after the standard has come into effect. However, all records shall be maintained by the MarinTrust Secretariat until after the next revision of the standard, as a minimum.

Once records on the MarinTrust website have been removed, stakeholders and interested parties may contact the MarinTrust Secretariat to request a copy, which will be provided at MarinTrust's discretion.

11. Standard-setting Procedure Review

The MarinTrust Quality Management System (QMS) Review Committee is responsible for drafting and managing the MarinTrust Controls and Procedures. As part of this, the MarinTrust Technical Assurance Committee (TAC) shall conduct an annual QMS review to ensure the continuing suitability,

adequacy, and effectiveness of the MarinTrust Secretariat. The MarinTrust TAC shall review this Standard-Setting Procedure to ensure it remains current and applicable.

Comments on the standard-setting procedures are welcomed at any time, and will be documented and acknowledged. They are also specifically invited during the Standards review phase and should be directed to standards@marin-trust.com.

12. Publicly available information

In addition to these procedures for standards development and revision, including decision-making roles and responsibilities, MarinTrust shall ensure that the following information is readily publicly available:

- The date by which a standard or standard revision comes into effect and planned dates of any subsequent reviews.
- Accurate summaries of comments received during consultations, along with explanations of how the comments were considered.
- Justification and the details of any urgent substantive revisions made to its standards since the last review and revision.
- a summary of the ToR, including the proposed scope and intended sustainability outcomes.

AMENDMENT LOG

DATE	ISSUE	AMENDMENT	AUTHORISED BY
Version 2 edits (MarinTrust conversion)			
08/03/2021	2.0	MarinTrust Header & Footer inserted	Libby Woodhatch
08/03/2021	2.0	Reference of IFFO RS amended to MarinTrust throughout document where applicable	Libby Woodhatch
08/03/2021	2.0	Addition of the MarinTrust Social and Ethical Committee (SEC) in Internal Governance Roles.	Libby Woodhatch
01/05/2025	3.0	Specific reference that that the process of the development or revision of a Standard are consistent with MarinTrust intended impacts and strategies	Governing Body Committee
01/05/2025	3.0	Introduction: Addition of clarification on the continued relevance of the intended sustainability outcomes and impacts, and the standard's effectiveness.	Governing Body Committee
01/05/2025	3.0	Addition of guidance on process to follow where it is determined that Standard annual review is not necessary.	Governing Body Committee
01/05/2025	3.0	Inclusion of clarification on purpose and scope	Governing Body Committee
01/05/2025	3.0	Clarification on the term 'Accreditation and Certification Requirements Procedure.	Governing Body Committee
01/05/2025	3.0	Introduction: Addition of clarification on the continued relevance of the intended sustainability outcomes and impacts, and the standard's effectiveness.	Governing Body Committee
01/05/2025	3.0	Removal of technical advisory committee throughout the document.	Governing Body Committee
01/05/2025	3.0	Section 6: Clarification that the process of the development or revision of a	Governing Body Committee

		Standard are consistent with MarinTrust intended impacts and strategies.	
01/05/2025	3.0	Include and improve clarity on the intended sustainability claims that the standard will substantiate in the terms of reference	Governing Body Committee
01/05/2025	3.0	Section 7: Addition of further information to the general requirements to provide clarity.	Governing Body Committee