

# MarinTrust System Manual

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# 2 Introduction

### 2.1 MarinTrust overview

The purpose of <u>MarinTrust</u> is to advance best practice in the responsible sourcing, traceability, and production of marine ingredients through an accessible certification scheme.

MarinTrust has developed a detailed voluntary standard system to credibly and effectively allow holders of Certificates of Conformity ('certificates') to demonstrate responsible sourcing, traceability, and production of marine ingredients. The MarinTrust Certification Programme is a unique international certification scheme for marine ingredient certification, owned and managed by Marine Ingredients Certification Limited, and consisting of:

- The MarinTrust Standard
- The MarinTrust Chain of Custody (CoC) Standard
- The MarinTrust Improver Programme

These are all supported by systems for good governance, stakeholder engagement, complaints and appeals, risk management, monitoring, evaluation and learning.

Marine ingredients are nutritious natural products derived from marine organisms such as fish, krill, shellfish and algae. They are used mainly for aquafeed (75%), land animal feed, and pet food as well as for human consumption in the form of health supplements.

The majority of marine ingredients are fishmeal and fish oil, derived from small pelagic fish, and a growing volume comes from by-products (trimmings). Fishmeal and fish oil provide essential nutrients for human health, indirectly through the farmed animals that we eat and directly through the consumption of fish oil capsules. Just as fishmeal and fish oil play a vital role in the growth and health of farmed animals, these essential proteins, fats, minerals and vitamins are then passed onto humans.

A history of the MarinTrust Scheme is provided on the MarinTrust website.

#### 2.2 Document overview

This document describes the major components of the MarinTrust system.

Further details of all components are publicly available and referenced herein. These include a set of standard and assurance control documents as well as supporting policies, procedures, templates, and specific information relating to the MarinTrust Improver Programme.

This document also demonstrates that there are no policies or procedures where MarinTrust actively participates in any part of the assessment or certification decision-making process.

# 3 Scheme scope, objectives and general policy

## 3.1 Scope

MarinTrust supports the credible and efficient assessment of fisheries and certification of processing facilities against the MarinTrust Standard, in conjunction with MarinTrust Fishery and Factory Assessment guidance. MarinTrust also supports the certification of supply-chain entities against the MarinTrust Chain of Custody (CoC) Standard.

Certificate holders may be producers or processors of marine ingredients.

## 3.2 Objectives

#### The principal objectives of the MarinTrust Certification Scheme are:

- In the case of factories certified against the MarinTrust standard:
  - To ensure that whole fish used come from fisheries managed according to the FAO Code of Conduct for Responsible Fisheries.
  - To ensure no Illegal, Unreported and Unregulated (IUU) fishery materials are used.
  - To ensure pure and safe products are produced under a recognised Quality Management System, thereby demonstrating freedom from potentially unsafe and illegal materials.
  - To ensure full traceability throughout production and the supply chain.
- In the case of the MarinTrust Chain of Custody Standard:
  - To ensure that marine ingredients used come from MarinTrust certified sources and that full traceability is maintained throughout the supply chain.
  - To ensure no Illegal, Unreported and Unregulated (IUU) fishery materials are used.
- To allow certificate holders to demonstrate to stakeholders the commitment of producers, processors and further processors to responsible sourcing, and production of marine ingredients.

#### Also:

- Through the MarinTrust Improver Programme to provide a mechanism for applicants to map out a structured improvement journey with agreed milestones and a timeframe that must be met in order to become MarinTrust certified.
- To promote and encourage the principles of responsible fisheries management through the
  assessment of Raw Material Source Fisheries against a standard derived from the FAO Code of
  Conduct for Responsible Fisheries and other internationally recognised Sustainable Fishery
  Guidelines.
- To ensure that MarinTrust CoC standard remains relevant, robust and fit for purpose.
- To prevent non MarinTrust compliant product being labelled as MarinTrust.
- To facilitate corporate risk management and demonstrate due diligence, among participants, through third-party assurance of conformity with the MarinTrust Standards, supported by traceability and robust data management.



Conformity with the Standard requires that marine ingredients are produced to high standards of safety and quality, with due care for the environment, workforce, and local communities. It also ensures that raw materials are not sourced from IUU (illegal, unreported, and unregulated) fishing or endangered species, and that whole fish originate from responsibly managed fisheries aligned with the FAO Code of Conduct for Responsible Fisheries. In particular, the Standard seeks to ensure the remediation of any adverse impacts on local communities relating to child, forced, bonded, or involuntary labour, including prison labour. More broadly, it requires accessible and effective complaints and appeals procedures, and the identification, addressing, and, where possible, remediation of any social or environmental issues linked to the scheme.

MarinTrust's Theory of Change is available on the MarinTrust website.

# 4 Major System components

The major system components are standards and assurance. These are supported by systems to ensure good governance (including monitoring, evaluation and learning, risk management), as well as credible claims and labelling, due process for complaints, appeals, etc. These are all described in the following sections of this document. MarinTrust's <a href="Theory of Change">Theory of Change</a> illustrates and describes how these components work together to deliver MarinTrusts's objectives.

The content of this System Manual will be subject to review at least once every 2 years, or sooner if required.

## 5 Governance

## 5.1 General MarinTrust Policy Statement

The MarinTrust policy is founded on a commitment by MarinTrust and its stakeholders to:

- Provide and support a responsible sourcing standard, assessment, and certification framework for producers of marine ingredients such as fishmeal and fish oil, and the supply-chain
- Demonstrate to industry stakeholders the extent to which responsible sourcing and processing
  policies and procedures have been implemented.

All activities of the MarinTrust Scheme are carried out in a systematic manner in accordance with defined and documented policies and procedures, will meet applicable legislative requirements, and will ensure that the needs of applicants, staff, Certification Bodies (CBs), Accreditation Bodies (ABs) and all other related stakeholders are met.



MarinTrust maintains open and effective communication with all stakeholders directly and indirectly involved in the MarinTrust Scheme on any changes to the standard and certification process, as well as systematic validation and control of quality processes.

The MarinTrust Programme is a voluntary certification programme based on the MarinTrust certification scheme. There is no legal requirement for Marine Ingredient producers, or those businesses involved in further processing, to be certified or accepted as part of the MarinTrust Scheme.

#### MarinTrust will also support:

- A participatory work ethic, to properly apply the innate excellence of staff, and to provide a culture in which they excel.
- Continuous improvement including for audit, assessment, and certification processes and trainingrelated services

MarinTrust is committed to providing and facilitating a cost effective and practical assessment and certification audit process through which all sizes of marine ingredient producers and supply chain organisations can demonstrate their commitment to responsible sourcing practices and robust traceability systems, and will implement the systems described in this document in order to achieve the following objectives:

- Partnership with CBs and Applicants to provide for their needs and enhance their expectations to enable them to meet the requirements of the MarinTrust certification scheme.
- Open and effective communication with applicants and certificate holders, interested parties, and committees.

## 5.2 Financial and legal structure

Marine Ingredients Certifications Ltd (Company number 09357209) is an international organisation which operates the MarinTrust certification scheme and derives its funding from administrative fees from applicants and certificate holders of the scheme. A summary of income course is outlined on the MarinTrust website.

Certification Bodies (CBs) that conduct the MarinTrust assessment, audit, and certification process are separate legal entities from Marine Ingredients Certification Ltd and from MarinTrust certificate holders or applicants. CBs derive their funding from the audit fees, assessment of fisheries, and other supply chain organisations.

Accreditation Bodies (ABs) are also separate legal entities from all other MarinTrust parties and derive their finances from the assessment and accreditation of CBs. For further detail on the MarinTrust Assurance Oversight structure, please see **Section 7.1**.



### 5.3 Governance Structure

The MarinTrust certification scheme has a robust governance structure in place to ensure successful management with defined responsibilities and functions. The composition and roles of MarinTrust governance, including the committees involved in running the MarinTrust certification scheme effectively are described on the MarinTrust Governance Structure, available on the MarinTrust webpages.

In assigning membership of each body, MarinTrust ensures that individuals have adequate capacity, knowledge and experience to fulfil responsibilities. The Terms of Reference of each committee can be found in the following documents:

- Governing Body Committee (GBC) Terms of Reference
- Improver Programme Application Committee (IPAC) Terms of Reference
- Social and Ethical Committee (SEC) Terms of Reference
- Technical Assurance Committee (TAC) Terms of Reference
- Standards Steering Committee (SSC) Terms of Reference
- Fisheries Development Oversight Committee (FDOC) Terms of Reference
- Appointments Committee (AC) Terms of Reference

### 5.4 Secretariat Structure and Role

The Secretariat is responsible for developing, reviewing, and maintaining the scheme's Standards through transparent, multi-stakeholder governance processes, ensuring alignment with international best practice.

It also is responsible for defining the key assurance processes, procedures, and policies that CBs must follow, in addition to complying with ISO/IEC 17065 requirements. All processes, procedures, and policies developed by the Secretariat are aligned with ISO/IEC 17065 and the ISEAL Codes of Good Practice, ensuring the MarinTrust certification scheme is implemented consistently and robustly.

The Secretariat has a role of oversight, providing guidance and training to CBs, monitoring compliance, and ensuring the consistent, credible, and robust application of both the Standards and assurance framework across the scheme.

The Secretariat is also responsible for coordinating the Annual Review of the assurance system, refer to section 7.12 for further information, and publishing the proposed 'MarinTrust Programme of Work'.

The MarinTrust Secretariat organisational structure is shown on the MarinTrust website, and makes freely and publicly available information and documentation regarding the scheme's governance structure, ownership, standards and standard-setting procedures, and the composition, processes, and responsibilities of its governance committees on its website <a href="https://www.marin-trust.com">www.marin-trust.com</a>.



## 6 Standards

There are two MarinTrust Standards:

- The MarinTrust Global Standard for Responsible Supply of Marine Ingredients (also known as the 'factory standard')
- The MarinTrust Chain of Custody Standard

These standards have been regularly revised in compliance with ISEAL requirements. This ongoing process ensures that the standards remain accessible, credible and relevant to industry and stakeholder needs, and in particular that audit and assessment processes continue to be robust.

The full requirements for the of the MarinTrust Standard and CoC standard can be found on the website, and all relevant normative references can be found listed in the Standards themselves.

## 6.1 Interpretation Documents and supporting documents

MarinTrust Standards are supported by a set of public and controlled interpretation and guidance documents.

All publicly available documents can be found on the relevant MarinTrust Standards website pages. All controlled documents are stored and maintained within MarinTrust's documents library and shared with all relevant stakeholders, such as Certification Bodies, in line with document control requirements.

### 6.2 Standard Revisions

All MarinTrust Standards are developed, reviewed, and revised in line with the **Standard Development Procedures** available on the website. Standards are reviewed at a minimum every five years, in compliance with ISEAL requirements. In summary:

- The GBC makes the approval decision on the scoping, setting and development of a new standard or revision of existing standards.
- The MarinTrust Secretariat arranges and facilitates the process of the development of a new standard or revision of existing standards which includes both the planning of the process and development of content, supported by the SSC and SEC, as well as public consultations in line with the ISEAL Code of Good Practice for Sustainability Systems.
- The Technical Assurance Committee (TAC) provides support on the development, revision, and implementation of a credible and robust assurance system for a global certification scheme for the marine ingredients industry, providing assurance to the global supply chain that all certified sites to this scheme source and produce marine ingredients responsibly



- The Standard Steering Committee 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 certification scheme.
- The GBC takes the final decision on new and revised standard approval by consensus decision making prior to publication.

# 7 Assurance

# 7.1 Overall Structure of Assurance

Marine Ingredients Certification Ltd, operating as MarinTrust, is an international organisation that runs an independent third-party certification scheme. Certification is not carried out by MarinTrust. It is carried out by independent Certification Bodies (CBs) that in turn have to be accredited by Accreditation Bodies (ABs).

Marine ingredient factory certifications are valid for 3 years and are subject to annual third-party audits of the facility by an accredited CB, and annual assessment of the raw materials including the source fisheries to assess their compliance to the MarinTrust Standard. MarinTrust CoC certification are also valid for 3 years are subject to an annual third-party audit by an accredited CB. Subcontractors are also subject to audits however refer to the relevant Standard for specific guidance for relevant activities.

It should be noted that the Improver Programme is an acceptance programme and does not constitute as a certification scheme, and managed to its own set of application and assurance procedures described on the MarinTrust website, and summarised in Section 8.1 below.

The MarinTrust certification scheme is aligned with ISO/IEC 17065 to ensure that CBs operate in a consistent and controlled manner to ensure certificate holders manage their businesses and market their products in full compliance with the criteria defined in the standards.

CBs must be accredited against ISO/IEC 17065, with the MarinTrust standards in the scope of their accreditation. An accredited CB is assigned a government-appointed Accreditation Body (AB) based on the location of its critical office. As part of ISO/IEC 17065 accreditation, CBs shall be a legal entity, or a defined part of a legal entity, such that the legal entity can be held legally responsible for all its certification activities. Therefore, all CBs registered to audit under the MarinTrust certification scheme:

Are separate legal entities from Marine Ingredients Certification Ltd and MarinTrust applicants.



- Derive their funding via audit fees from the assessment of fisheries and other supply chain organisations.
- Have a legally enforceable agreement for the provision of certification activities to its clients.

ABs are also separate legal entities from all other MarinTrust parties and derive their finances from the assessment and accreditation of CBs. ABs must be a signatory member of the International Accreditation Forum (IAF) Multilateral Agreement (MLA). The contracts for accreditation are between the CB and the AB.

The MarinTrust Secretariat notifies ABs, CBs and relevant stakeholders of any changes in management procedures which affects rules and procedures for accreditation or certification.

The details of all the relevant procedures and requirements are provided in the following documents:

- Guidelines for CBs managing applications for certification to the MarinTrust Programme
- Conducting MarinTrust Fishery or By-product Assessments by Registered Certification Bodies
- Procedure for registered Certification Bodies conducting audits against the MarinTrust
   Programme
- Procedure for the issuing and withdrawal of Certificates to the MarinTrust Programme
- Appeals and Complaints Procedure for the MarinTrust Programme
- Process for Handling Remote MarinTrust Factory and Chain of Custody Audits During an Extraordinary event (applicable when invoked by MarinTrust)
- Procedure for the monitoring and allocation of fishery and by-product assessments
- Procedure for Appointment, Training and Approval of Certification Body Personnel involved in the assessment, audit and certification process
- Procedure for the appointment, training, and approval of certification body personnel involved in the assessment, audit, and certification process
- Certification Body (CB) Approval Requirements for MarinTrust Audits and Certification
   Procedural Approval Criteria for Certification Body Applicants Wishing to Apply for Approval to
   Audit and Certify Against the MarinTrust Programme
- Clients transferring certification from their current Certification Body to another
- MarinTrust Factory Audit Report Template
- MarinTrust By-product Assessment Report Template
- MarinTrust Fishery Assessment Report Template
- MarinTrust Chain of Custody Audit Report Template
- MarinTrust Service Agreement for Services and Certification Services

## 7.2 Certification Body Requirements

An accredited CB is the sole authority by which Certificates of Conformity may be granted, suspended, or withdrawn. nd this is done in accordance with the requirements set out in the Standards and the Quality Management System.

The MarinTrust certification scheme requires that CBs operating in the scheme be accredited to ISO/IEC 17065 for the scope of the scheme's Standards.



The service provided by each CB employed is subject to contract, which sets out the arrangements for the provision of the service and it includes requirements for the information and data arising from the provision of the service to be retained in confidence. The MarinTrust Secretariat maintains a copy of the agreement with each CB and these are available for examination, on request, by authorised persons.

The MarinTrust Secretariat requires CBs to maintain a written fee structure that is available on request and is adequate to support accurate and truthful audit and assessments commensurate with the scale, size and complexity of the application, including the number and nature of fishery and by-product assessments to be conducted, and the number and nature of site audits.

More details of CB requirements are found in the following:

- Certification Body (CB) Approval Requirements for MarinTrust Audits and Certification
- Procedural Approval Criteria for Certification Body Applicants Wishing to Apply for Approval to Audit and Certify Against the MarinTrust Programme

## 7.3 Accreditation Body Requirements

Accreditation Bodies (ABs) are government-assigned entities to the CB and must be nationally recognised, either government-owned or under agreement with government and must be a signatory member of the International Accreditation Forum (IAF) Multilateral Agreement (MLA).

The MarinTrust Secretariat on behalf of the GBC will endeavour to work in collaboration with ABs that offer accreditation to the scheme. The arrangement requires the ABs to be compliant with the requirements of ISO/IEC 17011.

The MarinTrust certification scheme specifies the requirements for CBs that the AB is required to verify. Subsequent to any changes in the accreditation requirements, as the scheme owner MarinTrust ensures CBs are given a defined time period to conform to the changes.

The MarinTrust certification scheme requires that the AB has the necessary personnel with appropriate knowledge and skills for performing accreditation functions in fisheries and factory operations. This includes knowledge of the MarinTrust standard and its intent.

The MarinTrust certification scheme requires that external audits be carried out on the AB to assess performance via their peer review and evaluation process.

The MarinTrust certification scheme requires that the AB makes information available on request regarding the accreditation body itself and accreditation process.

The MarinTrust certification scheme ensures that the accreditation process includes an assessment (onsite or remote) of the certification body.



MarinTrust requires the inclusion of the MarinTrust Standard in Certification Bodies' scope of accreditation for the International Organisation for Standardisation ISO/IEC Guide 65:1996 - now superseded by ISO/IEC 17065.

## 7.4 Applicant and Certificate Holder Requirements

Application to the MarinTrust certification scheme is open to all marine ingredient producers and supply chain organisations around the world.

The technical specifications, which applicants to the MarinTrust certification scheme must meet to achieve certification, and must maintain to retain certification, are presented in the MarinTrust Standard and Chain of Custody Standard. The MarinTrust standards are controlled documents and are available publicly on the MarinTrust website.

Reapplications shall be submitted to the MarinTrust Secretariat six months in advance of the certification expiry, and making sure MarinTrust is aware of any changes to their scope including species or plants etc.

Further details of the relevant requirements and application forms are provided in:

- Guidelines for CBs managing applications for certification to the MarinTrust Programme
- Applying for the MarinTrust Standard and MarinTrust Improver Programme via the online application form.
- The MarinTrust Improver Programme: Application Process & Surveillance Procedures

Applications are made via the MarinTrust online application portal.

## 7.5 Assessments and Audits conducted by CBs

The role of CBs in the MarinTrust certification scheme can be summarised as follows.

#### 7.5.1 Fisheries assessments

- Conduct a desktop/remote assessment of the fishery/fisheries from which raw material (both whole fish and by-products) is sourced against the MarinTrust Standard.
- Determine the Fishery/Fisheries Approval Status based on performance during the desktop assessment, with the approval of fisheries against the standard as a mandatory prerequisite for Site Certification.
- Conduct annual Surveillance Assessments of Fisheries.
- Decide on the maintenance, suspension or withdrawal of Certificates of Conformity based on the outcomes of Surveillance Audits.
- Produce and send Fishery Assessment Reports and/or By-product Assessment Reports, once approval has been granted, to MarinTrust to be uploaded to the website.



- Verify raw material by-products from aquaculture species during factory audits, to ensure they are kept separate from other fishery raw materials when entering the factory and during processing.
- Identify any significant failure on the part of the applicant to meet the requirements of the MarinTrust standards, and to decide on the issue or denial of Certificate of Conformity based on conformity with the MarinTrust standards.

### 7.5.2 Factory/ Chain of Custody audits

- Conduct annual site audit/audits of the applicant's processing facilities against the MarinTrust Standard.
- Conduct annual site audit/audits of the applicant's traceability system against the MarinTrust Chain of Custody Standard.
- Identify any significant failure on the part of the applicant to meet the requirements of the MarinTrust standards, and to decide on the issue or denial of Certificate of Conformity based on conformity with the MarinTrust standards.
- Conduct annual Surveillance Audits of Processing / Chain of Custody Facilities, no more than twelve months after the prior audit / assessment.
- Decide on the maintenance, suspension or withdrawal of Certificates of Conformity based on the outcomes of Surveillance Audits.
- The MarinTrust requires CBs to send final audit reports and certificates to MarinTrust for the purposes of calibration, statistical analysis, and document control.

Note that all facilities that are processing MarinTrust Improver Programme raw materials will still have to undergo a full MarinTrust factory audit according to standard certification procedures.

#### 7.5.3 Improver Programme assessments

Verify Improver Programme fishery annual milestone reports.

Note: facility audits for Improver Programme Accepted facilities is conducted in line with the factory audits (7.5.2).

#### 7.6 Audit and Assessment Procedures

MarinTrust has detailed requirements for audit and assessment procedures, as summarised below, and supported by:

#### 7.6.1 Fishery and By-product Assessments

All whole fish fishery and by-products assessments, and pass or fail determinations against the MarinTrust requirements, are conducted and determined in accordance with the procedure for conducting MarinTrust Fishery or By-product Assessments by Registered Certification Bodies.

In summary this procedure provides details on the following:



- · Requirements, timelines, frequency for conducting assessments
- Handling of changes to scope
- Internal and external peer review requirements
- Assessment reporting and recording

All fishery and by-product assessment reports and peer reviews shall be completed using the relevant templates:

- MarinTrust By-product Assessment Template Report
- MarinTrust Fishery Assessment Template Report
- Fishery assessment peer review template report

MarinTrust also has outlines the procedure for allocation and monitoring of assessments in the procedure for the monitoring and allocation of fishery and by-product assessments.

### 7.6.2 MarinTrust Factory and Chain of Custody Audits

All MarinTrust Factory and Chain of Custody audits are required to be conducted in accordance with the procedure for registered Certification Bodies conducting audits against the MarinTrust Programme, and in alignment with ISO/IEC 17065 requirements.

In summary this procedure provides details on the following:

- Pre-audit process
- Audit procedures, nonconformity follow-up, and reporting requirements
- Technical review and certification decision
- Records

Conformity to the relevant MarinTrust Standard shall be determined in accordance with the MarinTrust Standard or MarinTrust Chain of Custody Standard criteria supported by guidance documents provided by MarinTrust.

All audit reports shall be completed using the relevant audit templates:

- MarinTrust Factory Audit Report template
- MarinTrust Chain of Custody V2 Audit Report Template

#### 7.6.3 Remote Audits

Remote audits under the MarinTrust scheme are not permitted unless an extraordinary event has been identified and extraordinary measures have been triggered by MarinTrust. Details for remote audits are provided in the process for Handling Remote MarinTrust Factory and Chain of Custody Audits During an Extraordinary event (applicable when invoked by MarinTrust).

#### 7.6.4 Maintenance of Records



CBs are required to maintain records within their documented Quality Systems to demonstrate compliance with the system and appropriate regulatory requirements. These records include reports arising from audits and assessments.

The CB records shall be readily accessible and safely stored for a period of five years unless otherwise specified.

The information contained in the CB records, other than that which is in the public domain, will be held in confidence unless otherwise required by the law, or requested/permitted to do so by the client.

## 7.7 Assessor and auditor competency

The MarinTrust Secretariat has defined the qualifications and competency criteria required by auditors, audit teams and fishery assessors employed, contracted, or subcontracted by CBs. These can be found outlined in the **Procedure for Appointment**, **Training**, and **Approval of Certification Body Personnel involved in the assessment**, audit, and certification process.

Only MarinTrust approved Fishery Assessors and Facility Auditors selected, appointed and controlled by registered CBs may carry out fishery assessments and auditing activities. MarinTrust maintains a training log, and requires CBs to also maintain training records.

## 7.8 Issuing and withdrawal of certification

### 7.8.1 Issue and Maintenance of a Certificate of Conformity

As a third-party business to business certification scheme, MarinTrust does not make decisions on certification outcomes, or acceptance in the case of the Improver Programme, or issue Certificates of Conformity. This is the responsibility of accredited CBs who follow the procedure which defines the method and instances by which certificates can be issued and withdrawn in the **procedure for the issuing and withdrawal of certificates to the MarinTrust Programme**.

### 7.8.2 Withdrawal of a Certificate of Compliance

Certificates of Compliance may be withdrawn where the CB has evidence that a Certificate Holder has failed to comply with any of the requirements as detailed in MarinTrust Certification Scheme. Certificate holders may also decide to opt out of the MarinTrust Certification Scheme for various reasons. Certificates shall be withdrawn in accordance with the procedure for the issuing and withdrawal of certificates to the MarinTrust Programme.

Appeals against a decision to withhold the issue or to withdraw a Certificate of Compliance will be heard in the manner described in the appeals and complaints procedure for the MarinTrust Programme.



### 7.9 Client Transfer

In some situations, MarinTrust Certificate Holders may request to transfer their certification to a new CB. Details of this procedure are contained within clients transferring certification from their current Certification Body to another.

## 7.10 Marks of Conformity

As a business-to-business certification scheme the use of the MarinTrust logo is not eco-labelling directed at the end user of the marine ingredient products.

Key documents for the management, use, and control of the MarinTrust logo and claims are as follows:

- MarinTrust Logo Management Procedure
- MarinTrust Licence Agreement and Claims Policy
- MarinTrust Improver Programme Claims Policy
- MarinTrust procedures for monitoring and investigation of misrepresentation

All certified and accepted facilities under the MarinTrust certification scheme must sign the relevant **Licence Agreement and Claims policy**. This agreement allows MarinTrust to further protect and enforce the integrity of the logo and claim usage. Random checks are done on a regular basis and surveillance activities are undertaken where there is a potential higher risk of misrepresentation with regards to the use of MarinTrust branding and claims.

Upon achieving certification status, all certified facilities must sign the MarinTrust Licence Agreement and Claims Policy available on the MarinTrust website and return to <a href="mailto:standards@marin-trust.com">standards@marin-trust.com</a>.

Upon achieving Improver Programme Acceptance status, all Improver Programme Accepted facilities must sign the **MarinTrust Improver Programme Claims Agreement** available on the <u>MarinTrust website</u> and return to <u>standards@marin-trust.com</u>.

MarinTrust Brand Guidelines area also made publicly available on the MarinTrust website.

## 7.11 CB assessment

Ongoing review of CB assessment and audit performance is conducted by the MarinTrust Secretariat to:

- Ensure compliance with audit and assessment procedures
- Consistency of interpretation of scheme requirements
- Assess an agreed set of Key Performance Indicators.

This is achieved in part by a combination of monitoring and calibration of assessment and audit



reports, continuous contact with assessment and audit staff, and witness of audits conducted by individual auditors and assessments of head office.

In addition, CBs undergo an annual audit by their Accreditation Body to ensure they continue to comply with the requirements of their ISO/IEC 17065 accreditation. This audit verifies that the CB operates impartially, competently, and consistently in certifying products, processes, or services.

## 7.12 Scheme and Assurance System Review

The MarinTrust certification scheme and assurance system, including the Standards, Certification Process and Procedures, and Improver Programme is subject to regular review to ensure they remain relevant, accurate and optimised. Standards are subjective to review at least once every 5 years, in compliance with ISEAL requirements, and is governed by the Standard Development Procedure. Quality Management System (QMS) documents are subject to review at least once every 2 years

The review outcomes include a list of findings, cause analysis, and preventive and corrective actions with deadlines and responsibilities, as applicable. The preventative and corrective actions can result in the revision of operating procedures or a standard.

Reviews are fully documented, carried out with the involvement of directly affected stakeholders and other interested parties and addresses any issues of concern raised by such. There are opportunities for stakeholders to engage via comments submitted directly to MarinTrust or MarinTrust approved CBs, or during open public comment periods for Standard revisions.

This review is discussed at relevant MarinTrust GBC meetings to determine if any actions relating to the standard content or certification requirements are required in any subsequent issues and versions of standards.

# 8 Supporting Systems

# 8.1 Improver Programme

The IP is a structured, timebound process, through which marine ingredient production facilities sourcing from improving fisheries (i.e. FIPs) can gain recognition of their production. It is not a standard and does not allow certification claims. Those accepted onto the IP commit to improvement requirements and may use approved statements to demonstrate the nature of the production and the link to the MarinTrust brand, however they MUST NOT use the MarinTrust logo.

The MarinTrust IP provides a process through which an improvement plan for the fishery can be developed and accepted. The production facility may then apply to use this improving raw material as part of the IP and must pass the MarinTrust facility audit in order to gain acceptance onto the programme.

Once accepted onto the Improver Programme, the fishery the facility is sourcing from has a structured improvement journey mapped out with agreed milestones and a timeframe that must be met in order to maintain IP recognition and ultimately work towards MarinTrust certification.

The MarinTrust Improver Programme thus provides a mechanism by which fisheries which do not currently meet the MarinTrust whole fish raw material requirements can work towards approval for certification along a structured pathway and in alignment with this System Manual.

Details on operating procedures for the Improver Programme can be found in the Improver Programme Application Mechanism.

In summary, to enter the Improver Programme the applicant must complete 5 key steps:

- 1. Self-evaluation of fishery.
- 2. Contract approved assessor.
- 3. GAP analysis against the MarinTrust fisheries assessment template.
- 4. Develop Fisheries Action Plan (FAP).
- 5. Sign stakeholder agreement.

Further details of application process and forms can be found on the MarinTrust website.

# 8.2 Monitoring, Evaluation and Learning

MarinTrust's Monitoring, Evaluation and Learning (MEL) system consists of a Theory of Change (including a Statement of Change) with associated assumptions, and a MEL Plan, all of which are explained in detail in the outline document. The MEL outline document aims to provide stakeholders and other interested parties with a clear description of what the MEL system is and what the MEL system entails.

The MEL system has been designed to monitor, illustrate and improve the actions MarinTrust take in order to realise its Statement of Change. Documents that explain the MEL system in detail are available on the MarinTrust website including:

- Monitoring, Evaluation and Learning Outline
- MarinTrust Theory of Change



- MarinTrust MEL Plan Overview
- MEL Baseline Report
- MarinTrust Assumptions
- MarinTrust Causal Pathways

## 8.3 Risk Management

MarinTrust has established a risk policy and maintains a detailed and regularly reviewed assurance threat register and a risk management system. This seeks to mitigate all significant risks to achieving MarinTrust's objectives and to optimise the balance between risk and impact. This includes mitigating any major negative consequences of the MarinTrust system.

The risk management system is comprised of:

- Risk management procedure
- Threat register
- Risk management policy
- Risk management plan
- Common root cause analysis guidance notes

### 8.4 Document Control

The MarinTrust certification scheme has established and maintains a system for reviews of certification and control procedures, guidance, policies, and documentation, to ensure that it facilitates an efficient and cost-effective certification scheme.

It is essential that all MarinTrust personnel and other relevant parties are made aware of relevant procedures and controls and adhere to the systems defined to ensure their effective operation. All changes to MarinTrust standards and certification processes and procedures, including the Improver Programme, are published on the MarinTrust website describing when these changes will take place and who to contact to gain further information on any transition period. The MarinTrust Secretariat is responsible for informing all relevant certification bodies, certificate holders, and relevant stakeholders of any changes or amendments to the MarinTrust certification scheme or certification processes and procedures.

The MarinTrust Secretariat keeps all records relating to the development of all versions and issues of the MarinTrust Standards, certification processes and procedures, for a minimum period of five years.

All users of the MarinTrust system are responsible for ensuring that they are using the most up-to-date version of relevant documents. The online version of each document is the latest version. All printed material is uncontrolled. It is the reader's responsibility to check that copied or printed versions are the current version.

#### 8.4.1 Issue and Control



The following documents are maintained and issued on a controlled basis:

- The MarinTrust System Manual and all associated processes, procedures, documents and templates for the MarinTrust certification scheme
- The MarinTrust Standard
- The MarinTrust Chain of Custody Standard
- The Improver Programme Acceptance Mechanism

#### 8.4.2 Master Lists

MarinTrust maintains master lists, available on their website, of:

- MarinTrust Standard Certificate Holders
- Approved by-product species
- Approved whole fish species
- MarinTrust Chain of Custody Certificate Holders
- MarinTrust Improver Programme accepted facilities
- MarinTrust Improver Programme accepted FIPs
- Verified species

CBs also maintain a list of their own clients and ensure that MarinTrust is informed of changes to the client list, including certification, suspension and withdrawal decisions.

MarinTrust also maintains a master list of documents which includes details such as version number, issue date, and effective date of current documents. The master list of documents log is updated regularly to reflect current documents. Public documents uploaded onto the website have version number added to the document name and show both issue date and effective date.

#### 8.4.3 Annual Internal Audit

An internal audit of the scheme's activities and performance is maintained. The audit assesses the implementation and adequacy of the systems defined in the MarinTrust System Manual and Quality Management System.

A suitably qualified person, this will be an external consultant, will conduct the audit and record any nonconformities with documented procedures, recommend corrective actions, and where appropriate make recommendations for systems improvements. Follow-ups will be conducted where necessary to verify corrective actions.

The consultant will make a report on the findings, which will be shared with the MarinTrust Governing Body Committee. The MarinTrust Secretariat will keep all records relating to the compliance with this QMS for a minimum period of 5 years.



### 8.4.4 Data Governance System

The Data Governance System enables MarinTrust to identify the data collected via the assurance system, who is responsible for collecting and holding the data, and how it is shared, as well as to maximise the efficiency, and quality of data collected and utilised, to inform MarinTrust about on the effectiveness of its systems. It also allows MarinTrust to maintain a good data management system and improve systems through feedback loops.

The Data Governance System consists of the following key elements:

- Data Strategy
- Data Value Chain
- Data Source File
- Data Governance Mapping exercises (Common Data Matrix, Data Governance Activity Matrix, Communication Plan Matrix)
- Data Governance Policy

MarinTrust's **Data Management Strategy** allows MarinTrust to make informed decisions about data projects, ensure that MarinTrust's objectives are achieved, and the availability of resources is driven appropriately to maintain an effective and efficient data management system.

The Data Governance policy enables MarinTrust to ensure the ongoing value and reliability of data collected through its processes and provides a framework to govern data access, usage and distribution. The policy describes the different elements of the Data Governance System as well as the roles and responsibilities that staff and other organisational partners have in preserving its effectiveness and integrity.

The MarinTrust Privacy Policy outlines how and why MarinTrust collects, stores, uses and shares personal information and the rights in relation to personal information of individuals, and can be found on the MarinTrust website.

## 8.5 Complaints, appeals, comments, and suggestions

#### 8.5.1 Comments and suggestions

MarinTrust is committed to providing a relevant, robust, and credible certification scheme on behalf of its stakeholders and welcomes comments, suggestions, and information on the scheme, including on:

- Its standards and assurance system at any time outside of the revisions and review processes. A
  separate process (with comprehensive stakeholder engagement) exists for periodic full revisions
  of MarinTrust Standards.
- Certificate holder performance following the initial certification process.
- Improver Programme accepted site performance at any point after being accepted onto the Programme.



• Certification Body performance following formal registration to the scheme.

Stakeholders should submit any relevant information via email to the MarinTrust Secretariat directly at <a href="mailto:standards@marin-trust.com">standards@marin-trust.com</a>.

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.

Further information regarding the submission of comments, suggestions, and information can be found in the procedure for **Submission of Comments**, **Suggestions and Information**.

### 8.5.2 Complaints and Appeals

MarinTrust is dedicated to the efficient and effective implementation of its processes, procedures, policies, and documents, however, should any stakeholders wish to submit a formal complaint about MarinTrust, its standard requirements or assurance system.

Stakeholders may also wish to submit appeals or complaints in relation to their certification, CB activities or Certificate Holders or potential misuse of the MarinTrust logo or claim.

Further information regarding the procedure for the submission of appeals and complaints can be found in the procedure for **appeals and complaints for the MarinTrust Programme** 

CBs are required to manage appeals and complaints in line with MarinTrust procedures and the CBs own appeals and complaints procedures, which shall be aligned with accreditation requirements.

If, in the case that a MarinTrust logo or claim to MarinTrust / MarinTrust CoC certification or acceptance to the MarinTrust Improver Programme may have has been misused, please contact MarinTrust directly via standards@marin-trust.com.



## **AMENDMENT LOG**

DATE	ISSUE	AMENDMENT	AUTHORISED BY
September 2025	3.0	Major revision to streamline all document content, update information, and formatting.	Francisco Aldon (CEO)