



## Social risk assessment guidance for facilities

Applicable requirements for vessels supplying whole fish

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## About MarinTrust

MarinTrust is the leading independent business to business certification programme for the marine ingredients value chain. Responsible sourcing and manufacturing are vital if marine ingredients are to remain a relevant ingredient in feed for land animals and agriculture, pet care and directly in the production of consumer products, including cosmetics and nutraceuticals. Fishmeal and fish oil make up the largest share of marine ingredients today; however all marine ingredients are included in MarinTrust's scope.

To enable stakeholders to credibly demonstrate the commitment to responsible practice in areas of feed safety, raw material procurement, delivery, and throughout the production process, MarinTrust developed a robust Certification Programme, consisting of three main components:

- The MarinTrust Global Standard for Responsible Supply of Marine Ingredients: The verification and certification of marine ingredients factories that source their raw material from approved fisheries and by-product species.
- The MarinTrust Chain of Custody (CoC) Standard: The verification and certification of the chain of custody for marine ingredients (products) that come from MarinTrust certified factories along the value chain to the customer.
- The Improver Programme: The verification and approval of marine ingredients factories that source their raw material from accepted MarinTrust Improver fisheries.

## About this document

This document includes information on the MarinTrust requirements for social responsibility risk assessment. These are used in the Standard for Responsible Supply of Marine Ingredients V3.0.

This document includes:

- The methodology and results for country risk ratings.
- The risk assessment for vessels supplying whole fish. For use in Section 2, Clause 2.11.2.1.

Country risk ratings are updated annually. Please ensure you are using the latest version which is available from the MarinTrust website.

## Available language(s)

The official version of this document is English. MarinTrust may translate this document into additional languages, as necessary. Translations will be available on the MarinTrust website. In case of any inconsistencies or discrepancies between the available translation(s) and the English version, the online English version (in PDF format) will prevail.

## Further information

Further information regarding application, rules and regulations of the programme can be obtained from MarinTrust.

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## Version control

It is the responsibility of the user of this document to use the latest version as published on the MarinTrust website.

Date	Issue	Amendment	Authorised by
<b>May 2024</b>	<i>V1.0</i>	<i>New document</i>	<i>Francisco Aldon</i>
<b>July 2024</b>	<i>V1.1</i>	<i>Updated country risk ratings in Annex 2</i>	<i>Francisco Aldon</i>
<b>Dec 2025</b>	<i>V1.2</i>	<i>Updated risk rating for in Annex 2</i>	<i>MarinTrust CEO</i>

## About risk assessment

Risk assessment provides a way for businesses to understand the landscape in which they operate. They are commonly used to help businesses identify where there may be issues, for example in a specific country or a specific supply chain.

Risk assessment is part of a 'toolkit' on due diligence. But it only provides an initial indication of risk. It is not a replacement for understanding specific supply chains or individual companies/suppliers within the supply chain.

Human rights risk assessments commonly cover three levels<sup>1</sup>:

1. Country level
2. Sectoral level
3. Company level

It is useful to start at the broad country level as this shows which countries may be associated with higher levels of human rights risks. Beyond that, companies can dive deeper into their own sectors and supply chains.

Risk assessment can use different measures and indicators, depending on what is relevant to include. And there are many different risk assessment methodologies available. However, many of these use common indicators.

## The MarinTrust social risk assessment

This MarinTrust social risk assessment combines country and sectoral level indicators i.e. indicators specific at both the country and seafood levels. The indicators (Table 1) are well established and commonly used in seafood specific risk assessments.

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<sup>1</sup> UN Principles for Responsible Investment, How to identify human rights risks: a practical guide in due diligence.

**Table 1: Indicators used in the MarinTrust social risk assessment**

General country governance	Seafood specific
<ul style="list-style-type: none"> <li>Country is ranked on the Corruption Perception Index (CPI)</li> <li>Global Slavery Index</li> <li>US State Department Trafficking in Persons (TIP)</li> </ul>	<ul style="list-style-type: none"> <li>Country is on US Department of Labor List of goods made with significant incidences of known labour violations for the following categories (fish, tilapia, shellfish, and shrimp)</li> <li>EU red or yellow card for IUU (Illegal, Unreported or Unregulated) fishing</li> </ul>

The method and the results are used in specific areas within the MarinTrust Standard for Responsible Supply of Marine Ingredients (the factory standard). These are described in the following sections.

#### Risk assessment methodology

A risk assessment methodology has been developed, using the indicators in Table 1.

Each of the five indicators in Table 1 is allocated a range of scores (0 to 4), with 0 the best score (Table 2) and 4 the worst. The total score of all five indicators provides an overall score, which provides the risk rating (Table 3).

**Table 2: Scoring criteria of each country risk indicator**

General country governance	Scoring criteria			
Country is ranked on the Corruption Perception Index (CPI) $\leq 41$	Yes = <b>1 point</b>		No = <b>0 points</b>	
3 in 1000 or more of the country population (within which the vessel is registered to operate) are in modern slavery (Global Slavery Index)	Yes = <b>1 point</b>		No = <b>0 points</b>	
US State Department Trafficking in Persons (TIP)	Tier 3 = <b>4 points</b>	Tier 2 Watchlist = <b>2 points</b>	Tier 2 = <b>1 point</b>	Tier 1 = <b>0 points</b>
Seafood specific				
Country is on US Department of Labor List of goods made with significant incidences of known labour violations for the following categories (fish, tilapia, shellfish, and shrimp)	Yes = <b>2 points</b>		No = <b>0 points</b>	
EU red or yellow card for IUU fishing	Red card = <b>2 points</b>	Yellow card = <b>1 point</b>		No card/ delisting = <b>0 points</b>

**Table 3: Total risk scores and rating**

<b>High</b> <b>Sum <math>\geq</math> 5 points</b>	<b>Medium Risk</b> <b>Sum <math>&gt;1 &lt; 5</math> points</b>	<b>Low Risk</b> <b>Sum <math>\leq</math> 1 point</b>
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The individual indicators are updated periodically, typically each year or as/when a new dataset is available. As such, scores will vary.

### Country risk ratings

Using the described methodology, each country achieves a total score and associated risk rating. See Annex 2 for full list of countries and ratings (correct at the time this document was produced).

Depending on which part of the Standard the country denotes either:

- The flag state of the vessel supplying whole fish, or
- The location of the production facility (factory).

Country risk scores and ratings can change depending on the performance of each indicator. Scores and ratings are updated annually, typically in June-July after the latest TIP report is issued. However, updates may be completed after other information sources are revised. A revised version of this document will be created to include the latest country ratings. This will be available from the MarinTrust website.

The country risk ratings are used as a starting point by the production facility. Depending on which part of the Standard is under consideration or the rating itself, the production facility will be required to take different actions, for example implement additional checks.

## Social risk assessment for vessels supplying whole fish

This section provides an overview of the requirements for social responsibility for vessels supplying **whole fish** directly to marine ingredient producers.

It is related to Section 2, Clause 2.11.2.1:

*The facility shall complete and document the results of the MarinTrust Social Responsibility Risk Assessment for all vessels supplying whole fish.*

### Rationale

Assurance is required from vessels supplying whole fish. This has always focused on the integrity of the raw material, but V3.0 has introduced additional requirements relating to the fishing crew.

The requirements for additional assurance from vessels supplying whole fish depends on the level of risk and type of vessel ownership. The assurance comes in the form of supplier agreements and the requirement for fishing vessels supplying whole fish to have a policy on social responsibility, covering a number of areas of effective social practice and human rights.

This section of the guidance provides information on what is required from vessels supplying wholefish.

For auditing purposes:

- Facilities are required to document the risk assessment results and the sourcing arrangements in place with vessels supplying whole fish.
- Facilities must be able to show copies of vessel agreements to the auditor.
- Facilities must be able to demonstrate they have agreements in place with vessels as applicable. These must include the relevant content.



### Part A: Risk rating for vessels supplying whole fish


All facilities which receive whole fish directly from fishing vessels shall start with identifying the risk rating of each vessel, based on the vessel flag state.


The facility shall:

1. Compile a list of vessels from which whole fish are sourced.
2. Include the flag state of each vessel i.e. the country the vessel is officially registered in for commercial fishing.
3. Use the Table in Annex 2 to find the risk rating for each country or flag state.
4. Add the risk rating for each country to the collated list.
  - Where a rating is **low**, the facility is not required to take further action.
  - Where a rating is **medium or high**, the facility is required to go to the next stage of this assessment (**Part B**).

The details for the vessels shall be documented as evidence for the auditor. See Annex 4 for an example of the information required.

## Part B: Vessel ownership

Question 1	Response	Action required	Guidance
Are vessels owned by the same company that owns the marine ingredients facility?	Yes Or No	If <b>YES</b> - no further action  If <b>NO</b> - go to <b>Question 2</b> 	If answer is yes, this means the crew / workers are employed or directly contracted by the parent company of the marine ingredient facility on the same terms and conditions as workers employed in the facility.  This is classed as <b>low risk</b> with no further requirements.  However, if the auditor identifies that the crew are employed on terms and conditions which are not in line with the requirements of the MarinTrust standard, the assessment for that vessel shall proceed to <b>Question 2</b> .

Question 2	Response	Action required	Guidance
is there an existing agreement / contract in place with the vessels that are supplying whole fish?	Yes Or No	If <b>YES</b> , existing agreement covers social requirements (see Annex 3)  If <b>NO</b> , go to <b>Part C</b>  	If answer is <b>yes</b> , the facility shall have copies of agreements that includes content covering social requirements. The social requirements are included in Annex 3.  The facility shall have this agreement from all the vessels supplying them with wholefish.  The Auditor will check that the facility has these agreements from the vessels.

The details for the vessels shall be documented as evidence for the auditor. See Annex 4 for an example of the information required from Part B.

### Part C: Assurance required from vessels not under existing agreements

If a facility is sourcing whole fish from a vessel and there is **no** existing supplier agreement with that vessel, this must be put in place.

For social accountability, vessels supplying whole fish shall include a social accountability self-declaration / policy which is communicated to all crew. This requirement is phased in over six years (two certification cycles) to enable a facility time to introduce the requirement with all vessels it sources from.

The agreement with each vessel shall include, as a minimum, the wording in Annex 3.

Agreements are required before accepting landings from each vessel. Noting that these agreements are phased in over time.

### Timescale for introducing social accountability into agreements with vessels supplying whole fish

The aim is that all vessels supplying whole fish will have a commitment to social responsibility in time. However annual targets are introduced to enable facilities time to meet this requirement.

By the end of the first 3-year certification cycle, the target is to achieve 50% of supplying vessels covered by such a policy / an agreement.

Percentage of vessels included each year ( <u>first</u> certification cycle)	Percentage of vessels included each year ( <u>second</u> certification cycle)
Yr 1 = 10%	Yr 4 = 66%
Yr 2 = 25%	Yr 5 = 85%
Yr 3 = 50%	Yr 6 = 100%

### The audit

For the purposes of the audit, the auditor will check:

- Whether the facility sources whole fish from fishing vessels.
- That there is a full list of fishing vessels that the facility sources from. And for each vessel, the country they are registered to, and what the risk rating is.
- Whether the fishing vessels:
  - Are owned by the parent company that owns the marine ingredient facility.
  - Have an existing agreement in place.
- That supplier agreements are available from fishing vessels that include the social commitment.
- That the number of agreements cover the required number of vessels for that year of the certification cycle.

## ANNEXES

### Annex 1: Country risk assessment methodology

This is the methodology used to determine the risk ratings for a country.

General country governance	Scoring criteria			
Country is ranked on the Corruption Perception Index (CPI) ≤ 41	Yes = <b>1 point</b>		No = <b>0 points</b>	
3 in 1000 or more of the country population (within which the vessel is registered to operate) are in modern slavery (Global Slavery Index)	Yes = <b>1 point</b>		No = <b>0 points</b>	
US State Department Trafficking in Persons (TIP)	Tier 3 = <b>4 points</b>	Tier 2 Watchlist = <b>2 points</b>	Tier 2 = <b>1 point</b>	Tier 1 = <b>0 points</b>
Seafood specific				
Country is on US Department of Labor List of goods made with significant incidences of known labour violations for the following categories (fish, tilapia, shellfish, and shrimp)	Yes = <b>2 points</b>		No = <b>0 points</b>	
EU red or yellow card for IUU fishing	Red card = <b>2 points</b>	Yellow card = <b>1 point</b>	No card/ delisting = <b>0 points</b>	
Overall country risk category	High	Medium Risk	Low Risk	
	Sum ≥ 5 points	Sum >1< 5 points	Sum ≤ 1 point	

**Annex 2: Country risk ratings**  
(as of 5<sup>th</sup> December 2025)

Country / Territory	TOTAL SCORE	OVERALL RISK RATING
Afghanistan	6	HIGH
Albania	2	MEDIUM
Algeria	3	MEDIUM
Angola	3	MEDIUM
Argentina	2	MEDIUM
Armenia	2	MEDIUM
Australia	0	LOW
Austria	0	LOW
Azerbaijan	3	MEDIUM
Bahamas	Insufficient data	
Bahrain	1	LOW
Bangladesh	5	HIGH
Barbados	Insufficient data	
Belarus	6	HIGH
Belize	0	LOW
Belgium	Insufficient data	
Benin	2	MEDIUM
Bhutan	Insufficient data	
Bolivia	4	MEDIUM
Bosnia and Herzegovina	3	MEDIUM
Botswana	1	LOW
Brazil	6	HIGH
Brunei	Insufficient data	
Bulgaria	2	MEDIUM
Burkina Faso	4	MEDIUM
Burma	Insufficient data	
Burundi	3	MEDIUM
Cabo Verde	Insufficient data	
Cambodia	10	HIGH
Cameroon	5	HIGH
Canada	0	LOW
Central African Republic	3	MEDIUM
Chad	6	HIGH
Chile	1	LOW
China, People's Republic of	7	HIGH
Colombia	3	MEDIUM

Country / Territory	TOTAL SCORE	OVERALL RISK RATING
Comoros	Insufficient data	
Congo	4	MEDIUM
Costa Rica	2	MEDIUM
Côte d'Ivoire	2	MEDIUM
Croatia	2	MEDIUM
Cuba	6	HIGH
Cyprus	1	LOW
Czechia	1	LOW
Democratic Republic of the Congo	4	MEDIUM
Denmark	0	LOW
Djibouti	4	MEDIUM
Dominica	Insufficient data	
Dominican Republic	3	MEDIUM
Ecuador	4	MEDIUM
Egypt	3	MEDIUM
El Salvador	5	HIGH
Equatorial Guinea	3	MEDIUM
Eritrea	6	HIGH
Estonia	1	LOW
Eswatini	3	MEDIUM
Ethiopia	3	MEDIUM
Faroe Islands (see Denmark)	0	LOW
Fiji	Insufficient data	
Finland	0	LOW
France	0	LOW
Gabon	3	MEDIUM
Gambia	3	MEDIUM
Georgia	1	LOW
Germany	0	LOW
Ghana	3	MEDIUM
Greece	2	MEDIUM
Grenada	Insufficient data	
Guatemala	3	MEDIUM
Guinea	3	MEDIUM
Guinea-Bissau	3	MEDIUM
Guyana	2	MEDIUM

Country / Territory	TOTAL SCORE	OVERALL RISK RATING
Haiti	4	MEDIUM
Honduras	5	HIGH
Hong Kong	2	MEDIUM
Hungary	3	MEDIUM
Iceland	0	LOW
India	5	HIGH
Indonesia	5	HIGH
Iran	6	HIGH
Iraq	3	MEDIUM
Ireland	1	LOW
Israel	2	MEDIUM
Italy	2	MEDIUM
Jamaica	2	MEDIUM
Japan	1	LOW
Jordan	2	MEDIUM
Kazakhstan	3	MEDIUM
Kenya	5	HIGH
Korea, North	6	HIGH
Korea, South	1	LOW
Kosovo	2	MEDIUM
Kuwait	2	MEDIUM
Kyrgyzstan	4	MEDIUM
Laos	6	HIGH
Latvia	2	MEDIUM
Lebanon	3	MEDIUM
Lesotho	2	MEDIUM
Liberia	5	HIGH
Libya	Insufficient data	
Lithuania	1	LOW
Luxembourg	Insufficient data	
Macau	Insufficient data	
Madagascar	3	MEDIUM
Malawi	3	MEDIUM
Malaysia	2	MEDIUM
Maldives	Insufficient data	
Mali	3	MEDIUM

Country / Territory	TOTAL SCORE	OVERALL RISK RATING
Malta	Insufficient data	
Marshall Islands	Insufficient data	
Mauritania	3	MEDIUM
Mauritius	1	LOW
Mexico	3	MEDIUM
Micronesia	Insufficient data	
Moldova	2	MEDIUM
Mongolia	3	MEDIUM
Montenegro	Insufficient data	
Morocco	2	MEDIUM
Mozambique	2	MEDIUM
Myanmar	Insufficient data	
Namibia	1	LOW
Nepal	4	MEDIUM
Netherlands	0	LOW
New Zealand	1	LOW
Nicaragua	8	HIGH
Niger	4	MEDIUM
Nigeria	3	MEDIUM
North Macedonia	3	MEDIUM
Norway	1	LOW
Oman	2	MEDIUM
Pakistan	3	MEDIUM
Palau	Insufficient data	
Panama	4	MEDIUM
Papua New Guinea	6	HIGH
Paraguay	5	HIGH
Peru	5	HIGH
Philippines	4	MEDIUM
Poland	1	LOW
Portugal	2	MEDIUM
Qatar	2	MEDIUM
Romania	2	MEDIUM
Russia	6	HIGH
Rwanda	3	MEDIUM

Country / Territory	TOTAL SCORE	OVERALL RISK RATING
Saint Lucia	Insufficient data	
Saint Vincent and the Grenadines	Insufficient data	
Sao Tome and Principe	Insufficient data	
Saudi Arabia	2	MEDIUM
Senegal	1	LOW
Serbia	3	MEDIUM
Seychelles	Insufficient data	
Sierra Leone	4	MEDIUM
Singapore	0	LOW
Sint Maarten	Insufficient data	
Slovakia	2	MEDIUM
Slovenia	1	LOW
Solomon Islands	Insufficient data	
Somalia	Insufficient data	
South Africa	3	MEDIUM
South Sudan	6	HIGH
Spain	0	LOW
Sri Lanka	3	MEDIUM
Sudan	6	HIGH
Suriname	Insufficient data	
Sweden	0	LOW
Switzerland	1	LOW
Syria	6	HIGH
Taiwan	2	MEDIUM
Tajikistan	3	MEDIUM
Tanzania	4	MEDIUM
Thailand	5	HIGH
Timor-Leste	2	MEDIUM
Togo	3	MEDIUM
Trinidad and Tobago	4	MEDIUM
Tunisia	3	MEDIUM
Turkiye	3	MEDIUM
Turkmenistan	4	MEDIUM

Country / Territory	TOTAL SCORE	OVERALL RISK RATING
Uganda	5	HIGH
Ukraine	3	MEDIUM
United Arab Emirates	2	MEDIUM
United Kingdom	0	LOW
United States	1	LOW
Uruguay	1	LOW
Uzbekistan	3	MEDIUM
Vanuatu	Insufficient data	
Venezuela	6	HIGH
Viet Nam	6	HIGH
Yemen	Insufficient data	
Zambia	3	MEDIUM
Zimbabwe	4	MEDIUM

**It is essential that the latest ratings are used. Ensure you have the most up to date version of this document.**





### **Annex 3: Commitment required from vessels supplying whole fish**

Vessels are required to provide the facility with a copy of its social commitment or policy to demonstrate the following:

- responsible recruitment and employment (which includes workers have access to grievance mechanisms and no worker pays recruitment fees)
- all workers have chosen employment freely
- there is no child, forced, bonded, involuntary prison labour or involuntary labour
- all employees/workers are paid in line with legal requirements
- all health and safety requirements are in place
- there is no discrimination based on race, colour, sex, religion, political opinion, national extraction, or social orientation
- freely chosen worker representation for all employees is allowed.

The vessel shall also demonstrate to the facility how this commitment/policy has been communicated to all crew.

Types of evidence from the vessel required by the facility will include policies, procedures.

There shall also be evidence of how the facility has communicated with the vessel. For example, records of meetings between the facility and vessel, any inspections, on-site audits, checks of records, checking third-party inspections/audits etc.

Auditors will be expected to check that a facility has copies of evidence of how it engages and communicates with vessels on the requirements of this clause.

#### Annex 4: Information requirements for vessels supplying whole fish

##### Part A:

Vessel name	Flag state	Risk rating (high, medium, low)	Further action required
<i>Insert name</i>	<i>Insert country name</i>	<i>Insert risk rating</i>	<i>Indicate yes / no</i>



**IF risk rating is low, no further action is required.**

**IF risk rating is medium or high, Go to Part B**



##### Part B:

Vessel name	Flag state	Risk rating (high, medium, low)	Is the vessel owned by the company?	Is there an existing agreement for the vessel?
<i>Insert name</i>	<i>Insert country name</i>	<i>Insert risk rating</i>	<i>Indicate Yes or No</i>	<i>Indicate yes or no. If yes add date agreement was obtained. Have a copy of the agreement available.</i>

**IF vessels are owned/managed by the facility, no further action is required.**

**IF vessels owned by a third party with existing agreement, ensure agreement includes the social policy/commitment**

**IF vessels are owned by a third party, with no agreement in place, go to Part C**



##### Part C:

Vessel name	Flag state	Risk rating (high, medium, low)	Is the vessel owned by the company?	Is there a <b>NEW</b> agreement for the vessel?	Details of agreement
<i>Insert name</i>	<i>Insert country name</i>	<i>Insert risk rating</i>	<i>No</i>	<i>Yes or No</i>	<i>Indicate yes or no. If yes add date agreement was obtained. Have a copy of the agreement available</i>

### Example completed table of information

	Vessel name	Flag state	Risk rating	Is the vessel owned by the company?	Is there an agreement for the vessel?	Details of agreement	
			<i>High Medium low</i>	<i>Yes or no</i>	<i>Yes, No, Not applicable</i>	<i>Date agreement was obtained</i>	<i>Document details or reference</i>
1	<i>Amphitrite</i>	<i>Greece</i>	<i>Medium</i>	<i>Yes</i>	<i>Not applicable</i>	<i>Not applicable</i>	<i>Not applicable</i>
2	<i>Neptune</i>	<i>Croatia</i>	<i>Medium</i>	<i>No</i>	<i>Yes</i>	<i>1.1.2023</i>	<i>Neptune supplier agreement 2023-1</i>
3	<i>Ichthus</i>	<i>Italy</i>	<i>Medium</i>	<i>No</i>	<i>No</i>	<i>Not available</i>	<i>Not available</i>

### Data required for the auditor

Total number of vessels for sourcing whole fish	Number owned by parent company	Number of vessels from which agreements are required	Number of agreements already obtained	Number of agreements to obtain
3	1	2	1	1
Percentage of agreement obtained from vessels?	50%			