Global Standard for the Responsible Supply of Marine Ingredients V3.0

Interpretation guidance for facilities

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Contents

Version control, available language(s), and legal references

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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
May 2024	1	New document	Governing Body Committee
Feb 2026	1.1	Removal of reference to the audit not continuing in the case of a critical failure in introduction text to Section 1: Responsible sourcing pre-requisites	Governing Body Committee
Feb 2026	1.1	Update to appendix IV with the addition of revised further clarification and guidance on tolerance for composition of raw material batches	Governing Body Committee

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.

Disclaimer

Certification of a facility does not place any liability on MarinTrust, or any associated body involved in the development, implementation, auditing and issuing of certificates of this programme brought about through the failure of a facility to meet their legal obligations.

MarinTrust shall not be liable in the event the products handled at the facility and/or the facility itself are implicated in legal, social, environmental, or food safety issues.

About MarinTrust

Championing best practice in the sourcing and production of marine ingredients, MarinTrust is a programme dedicated to marine ingredient production factories, allowing those factories to gain recognition for responsible sourcing and production.

Since its inception, the MarinTrust programme has grown into the market leader for the certification of marine ingredient producing factories.

The MarinTrust Global Standard for Responsible Supply of Marine Ingredients (the Factory Standard/the Standard) has been developed and maintained in line with the MarinTrust mission and vision.

About this document

This guidance document complements the Standard. It aims to provide a clear and consistent interpretation of each clause, and what constitutes 'full conformance.' In this document each clause has associated guidance and the full conformance rating, structured as in Table 1.

Table 1: Structure of clauses and guidance tables

Clause number	Clause wording
Guidance:	Notes to provide an explanation of the clause, or intent of the clause. May refer to other information of a separate guide / template as applicable.
Full conformance	
Explanation of requirements for this rating	

Conformance ratings are defined in Document A4: Procedure for registered Certification Bodies conducting audits against the MarinTrust Programme available from the MarinTrust website.

This guidance document is normative in that it is an essential resource for facilities.

This guidance will be reviewed and updated periodically to take account of new situations or improvements.

Supplementary guidance and templates

There are supplementary guides and templates to accompany this document. These include:

- Definitions and key terms.
- Templates:
    - Metrics template.
    - Traceability exercise template.
    - Mass balance template.
    - Threat Assessment and Critical Control Points (TACCP) / Vulnerability Assessment and Critical Control Points (VACCP) template.
    - Social risk assessment for vessels supplying whole fish.

These guides and templates may also be updated periodically. It is essential that the most up to date versions are always used. These can be found on the MarinTrust website.

Overview of the Standard

The Standard comprises eight sections. A summary of each section is included in Table 2.

Table 2: Overview of each section of the Standard

Section number	Section title	Scope and intent of the section
1	Responsible sourcing pre-requisites	Includes the requirements for sourcing whole fish and by-products. As a pre-requisite, these raw materials must be from an approved source with assurance in place regarding the legality of sourcing.
2	Quality management system	Details what should be covered within a facility's quality management system, including policies, procedures, and other requirements.
3	Responsible raw material sourcing practices	Details the specific information and requirements to ensure raw materials can be verified as coming from an approved/accepted/recognised source, a specific origin i.e., supplier, farm. Includes the information and assurance required for each type of raw material.
4	Responsible traceability practices	Details the specifics for traceability of MarinTrust marine ingredients, including requirements for segregation from non-approved sources i.e., those not within the scope of approval by MarinTrust. Also, this section sets out how MarinTrust approved/accepted/recognised raw materials should be able to be traced through the production process, from source to final production, and sale to customer. Includes the requirement for mass balance to verify input and outputs.
5	Good manufacturing practices (GMP)	Focuses on the key requirements to ensure good manufacturing practices are in place, across all the key areas of the facility. Covers numerous specific requirements including hazard analysis, risk management, and operational details.
6	Staff training and competence	Makes provisions for employees responsible for areas related to this Standard to have the necessary skills.

7	Social accountability and community	Sets out requirements for staff safety, welfare and working conditions. Includes good community relations and engagement.
8	Environmental accountability	Details the requirements for environmental management and that the facility must be in line with any licenses/permits.

The remainder of this document includes each section and its clauses, including guidance and conformance ratings for each clause.

Section 1: Responsible sourcing pre-requisites

Factories (facilities) may source multiple types of raw material; approved or recognised as equivalent by MarinTrust, sourced from an accepted Fishery Improvement Project, or non-approved i.e. raw materials that have not been assessed and successfully passed the requirements of MarinTrust. The requirements of this section are applicable only to MarinTrust raw materials i.e. those included within the scope of the application submitted by the facility.

For non-approved raw materials, the facility shall provide evidence that those species are also not sourced from illegal, unregulated, or unreported (IUU) fishing or include endangered species. This is included in Clause 2.11.3.1, where the facility is required to obtain from its suppliers, a list of all sources of whole fish and by-products and assurance that no raw materials are sourced from IUU fishing or include endangered species.

Section 1 links directly to the initial MarinTrust fishery or by-product assessments which must be conducted before a facility can be audited. Clauses in this section are essential foundations upon which all approved / accepted raw materials are based.

For Section 1, the facility is required to show evidence that it is sourcing approved/accepted raw materials. The auditor will verify this information. If there is no evidence that the facility is sourcing approved / accepted raw materials or that any raw materials are from suspected IUU fishing or endangered species, then this is a critical failure.

1.1. Responsible sourcing

In this Standard to comply with the definition of responsible sourcing, the facility shall be able to demonstrate:

1.1.1	The responsible sourcing of legal, regulated and reported fishery material and the avoidance of material sourced from illegal, unregulated, and unreported (IUU) fishing activity.
Guidance:	This applies to the raw materials sourced for the purposes of MarinTrust marine ingredient certification. The facility is sourcing raw materials in line with MarinTrust requirements. Evidence is that the raw materials are listed as approved and/or accepted, or as recognised equivalent raw materials, on the MarinTrust website.
Full conformance	
Raw materials are sourced from a MarinTrust approved fishery or by-product and/or from a MarinTrust recognised equivalent fishery or by-product and/or from an accepted MarinTrust Fishery Improvement Project (FIP) according to MarinTrust requirements.	

AND The facility has a responsible sourcing policy (see Clause 2.3.1).

1.1.2	Sourcing whole fish raw material from fisheries that comply with the key requirements of the Food and Agriculture Organization (FAO) Code of Conduct for Responsible Fisheries.
Guidance:	MarinTrust raw material assessment criteria are based on alignment to the Food and Agriculture Organization (FAO) Code of Conduct for Responsible Fisheries (FAO CCRF). Alignment with the FAO CCRF is demonstrated by sourcing raw materials which have been deemed approved/accepted/recognised equivalent by MarinTrust. The facility sources raw materials in line with MarinTrust requirements i.e. raw materials are sourced from a MarinTrust approved fishery or by-product and/or from a MarinTrust recognised equivalent fishery or by-product and/or from an accepted MarinTrust Fishery Improvement Project (FIP) according to MarinTrust requirements. The other requirements of this Section 1 must also be in place. **Whole fish from a MarinTrust Fishery Improvement Project (FIP)** A facility sourcing only raw materials from a MarinTrust Fishery Improvement Project (FIP) cannot be classed as fully certified. If a facility only sources raw materials from a FIP this clause cannot be rated as 'full conformance.' In this instance the facility can still be audited against the remaining requirements of this Standard BUT can only make claims relating to the Improver Programme.
Full conformance	
The responsible sourcing policy (Clause 2.3.1) includes a written/published statement that the facility sources from raw materials from a MarinTrust approved fishery or by-product and/or from a MarinTrust recognised equivalent fishery or by-product and/or from an accepted MarinTrust Fishery Improvement Project (FIP) according to MarinTrust requirements.	

AND All other clauses in Section 1 are rated as 'full conformance'.

1.1.3	Raw materials are not from species that: · are a marine mammal, reptile, amphibian, or bird · stem from fisheries that use dynamiting, poisoning and other comparable destructive fishing practices · appear in the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) Appendix 1 or 2 · are categorised as Endangered or Critically Endangered on the International Union for Conservation of Nature (IUCN) Red List
Guidance:	The facility does not source any raw materials from species listed in this clause. The facility has procedures in place that show how it excludes raw materials from species listed in this clause. This procedure should include the checks and verification the facility undertakes prior to sourcing and on an ongoing basis.
Full conformance	
The facility has procedures to verify it does not source raw materials from species listed in this clause.	

1.2 Whole fish

1.2	The facility shall source whole fish raw material from a MarinTrust approved fishery, and/or MarinTrust recognised equivalent fishery and/or an accepted MarinTrust Fishery Improvement Project (FIP).
Guidance:	For any whole fish from wild capture fishery sources that are in scope of certification, the facility is able to demonstrate that the whole fish are listed as 'approved' on the MarinTrust website, are sourced from a FIP that is listed on the MarinTrust website or are sourced from a certified fishery that has successfully been formally recognised by MarinTrust through its recognition procedure (and listed as such on the MarinTrust website). Note: if the facility does not source whole fish that is deemed approved and/or accepted, or recognised equivalent, this clause and subsequent clauses specifically related to whole fish are not applicable.

Full conformance
The facility can fully document that all whole fish within scope of certification are from a MarinTrust approved fishery and/or from a MarinTrust recognised equivalent fishery and/or from an accepted MarinTrust Fishery Improvement Project (FIP) source.

1.3 By-products

1.3	The facility shall source wild-capture by-product raw material from a MarinTrust approved by-product species, and/or MarinTrust recognised equivalent by-product species.
Guidance:	For any by-products from wild capture fishery sources that are in the scope of certification, the facility can demonstrate that the by-products have been sourced in line with MarinTrust requirements. This means they are listed as 'approved' on the MarinTrust website, or stem from fish that have been caught in a certified fishery that has been formally recognised by MarinTrust through its recognition procedure (and listed as such on the MarinTrust website). Note: if the facility does not source by-products, this clause and subsequent clauses specifically related to by-products are not applicable.
Full conformance	
There is documentation that all by-products from wild capture within scope of certification are an approved by-product or formally recognised equivalent source.	

Section 2: Quality management system

2.1 Leadership and commitment

2.1.1	Senior management shall demonstrate their leadership and commitment to this Standard by having a signed policy.
Guidance:	The senior manager / leader in the business is required to commit to implementing the requirements of the standard. A documented policy, signed by the senior manager / leader is necessary to demonstrate this. This commitment may be in the same document or separate to the policies referred to in Clause 2.3.1. This documented policy can be signed electronically or manually.
Full conformance	
The facility has a written commitment to this Standard. AND This document has been approved and signed by the site's Chief Executive or an equivalent senior manager.	

2.1.2	Senior management shall provide all the resources needed to implement and improve the processes related to this Standard.
Guidance:	The senior manager / leader is required to provide all necessary resources to ensure the requirements of the standard can be met. This includes all resources required to implement existing requirements and include any new requirements. Resources can include personnel, financial/budget, time, activities, training, investment. This list is not exhaustive.
Full conformance	
Senior management can evidence the availability of resources in terms of personnel, budget, plans or projects approvals and assignment to implement, maintain and improve the MarinTrust standard.	

2.2 Roles, responsibilities, and authorities

2.2.1	The facility shall document the job role(s) responsible for compliance with this Standard.
Guidance:	A record of job roles / titles should be available which relate to responsibilities for specific activities required by this standard. This can be written in a list or table or shown in a diagram.

	If the facility is certified to multiple standards, a centralised list can be provided to set and define the specific roles and responsibilities across the different standards. This can be included in an Integrated Management System manual or equivalent.
Full conformance	
The facility has an organisation chart (or similar/equivalent) to show the job roles with responsibilities related to this Standard. AND Each job role related to the MarinTrust standard implementation and maintenance shall have, in the job description, the correspondent roles and responsibilities.	

2.2.2	The facility shall ensure roles and responsibilities for compliance with this Standard are communicated to employees working in areas related to the requirements of this Standard.
Guidance:	The facility has identified critical job roles that have specific responsibility for areas of this standard. Any personnel in those roles are aware of that requirement and how their role contributes to compliance with this Standard. The facility can show they have communicated this information to the job holders. Types of roles that will be included are senior management, quality management, purchasing, raw material intake, personnel responsible for storage areas / tanks, product labelling / coding etc.
Full conformance	
The facility has evidence that the job roles with responsibilities for this Standard has been communicated to the employees holding those positions. Examples of communication include job descriptions, induction, explanation in place, training, etc.	

2.3 Policies

2.3.1	The facility shall have documented policies including: • responsible sourcing • traceability • good manufacturing practices (GMP) • staff training and competence • social responsibility (including human rights, employment rights, health, and safety) • environmental accountability • bribery, corruption, and anti-coercion

Guidance:	These policies must be written but may be in one combined document or individual documents. They must have a clear title that shows what they include and dated. The responsible sourcing policy should cover all raw materials from aquatic sources and include the exclusion of material sourced from illegal, unregulated, and unreported (IUU) fishing activity.
Full conformance	
There are written policies covering ALL the areas listed.	

2.3.2	The facility shall have a process to ensure that all policies are communicated to all staff.
Guidance:	The facility shall have a written process to show how the company policies are communicated to all employees. This should explain the information communicated, how it is communicated and frequency. It can include training to explain the importance of the policies and how these policies are relevant to each employee. The auditor should obtain evidence of this written communication, including how / when it is provided to each employee. Examples of communication can be records of new staff inductions, staff training, staff handbooks, in the workplace, etc. Auditors may choose to ask staff at random if they are aware of these policies.
Full conformance	
The facility can demonstrate that policies have been fully communicated to all staff within the facility.	

2.4 Document management and control

2.4.1	The facility shall have a written document control procedure which applies to all documents necessary to comply with the full scope of this Standard.
Guidance:	The facility should have a system to show how it manages documents that are necessary to show compliance. This should include the list of documents, review timescales, dates of issue, responsibility for document management, and how old versions are replaced etc. The document control procedure can be single site or apply throughout a group under common ownership (if the facility is part of a group under common ownership). It can be specific for this Standard as well as applicable to other standards. The procedure should be in hard copy (written) or digital format. A specialist 'system' is not essential so long as the procedure is effective. This procedure can be integrated with other information systems or enterprise resource planning (ERP) systems which have their own internal procedures and modules.

Full conformance
There is a written document control procedure in place.

2.4.2	The document control procedure shall include: • retention timelines • version control • persons with the authority to modify and authorise the procedures / documents • measures to ensure outdated or obsolete versions are not used
Guidance:	The document control procedure in Clause 2.4.1 shall include: how long documents are retained, how versions are managed, which job holder has the authority to alter documents, which person is able to authorise documents and how out of date procedures are managed. The document control procedure can be single site or apply throughout a group under common ownership (if the facility is part of a group under common ownership). It can be specific for this Standard as well as applicable for other standards. The procedure should be in hard copy (written) or digital format. A specialist 'system' is not essential so long as the procedure is effective. This procedure can be integrated with other information systems or enterprise resource planning (ERP) systems which have their own internal procedures and modules.
Full conformance	
The facility has evidence that all documents follow all the requirements of the document control procedure related to retention timelines, version control, who is responsible for modification and authorisation, means to avoid use of outdated or obsolete documents versions.	

2.4.3	Records which provide evidence of compliance to this Standard shall be retained for at least three years, or for the duration of product shelf-life where that exceeds three years.
Guidance:	The facility must be able to show records dating back three years. These records can be kept in paper/physical or digital format. The records should be retained to ensure control, security, and suitable storage. NOTE: If the facility has only recently started to operate or is a new applicant, the minimum period for maintaining records related to traceability of marine ingredients should be three months.
Full conformance	
All records are retained for a minimum of 3 years.	

2.4.4	All records used to provide evidence of compliance to this Standard shall be accurate, legible, and unadulterated.
Guidance:	The auditor can read and understand all records. There is no evidence that records have been changed or altered during their lifetime.
Full conformance	
All records are accurate, legible, and unadulterated.	

2.4.5	The facility shall co-operate with the Certification Body and/or MarinTrust if it is asked to participate in a MarinTrust product integrity investigation by supplying an initial response and preliminary documentary evidence within five working days of a request for information.
Guidance:	The facility shall show they have a procedure for dealing with product integrity investigations by MarinTrust and/or the Certification Body (CB). This should include timelines and responsibilities defined to comply with this requirement. It should include that the facility fully co-operates with the CB and/ or MarinTrust should the need arise for a product integrity investigation. Initial documentary evidence is supplied within a period of five working days from the receipt of a request for information. Additional and detailed information could be provided after the first 5 days depending on the complexity and amount of information to be provided. If an integrity investigation has been requested, the facility shall have records to show what response was made, what information was provided and the timeline to fulfil the initial response.
Full conformance	
A documented product integrity investigation procedure is available. AND If it has occurred, the facility has co-operated with the CB and/or MarinTrust within the five working days from the receipt of a request for information.	

2.5 Reporting performance indicators

2.5	The facility shall provide information on its social and environmental performance on an annual basis (every 12 months) using the template available from MarinTrust.
Guidance:	This clause requires the completion of the MarinTrust V3 – Metrics template (available from the MarinTrust website). All essential sections of this template must be completed and provided to the auditor at the time of the audit, the auditor will check the template is completed.

	The facility can stipulate the reporting timescale i.e. which 12-month period the information in the template covers. This can be fiscal year or calendar year, depending on what the facility already reports on to other parties e.g. management reports, investor reports, public records etc. Information submitted should be the most up to date 12-month reporting period as at the time of the audit. Note the completed template will be included with the audit report that the CB will share with MarinTrust.
Full conformance	
The essential sections of the metrics template have been fully completed. AND This completed template is available for the audit.	

2.6 Internal audit

2.6.1	The facility shall conduct an annual internal audit against all the relevant requirements of this Standard.
Guidance:	The internal audit shall cover all relevant requirements (clauses) of the MarinTrust standard. This should include effectiveness of all operations, compliance with all the specific requirements, management of suppliers and services, raw materials, traceability etc. The internal audit must be undertaken annually.
Full conformance	
An internal audit has been conducted within the past 12 months. AND The internal audit is in accordance with the MarinTrust certification scope regarding sites, products, and processes.	

2.6.2	The internal verification audit conducted by the facility shall specifically include: • raw materials, suppliers, and subcontractors • verification of traceability
Guidance:	The internal verification audit shall cover all these areas. The facility shall be able to demonstrate how each of these areas are covered, what processes/procedures are in place etc. This is also to be undertaken annually.

	The traceability test must cover all stages from the source of raw material (back to vessels / supplier depending on type of raw material) through to marine ingredients produced.
Full conformance	
The internal audit includes all raw materials, suppliers, subcontractors and covers a complete traceability test related to the marine ingredients produced.	

2.6.3	The outcome of internal audits shall be documented, including evidence in the form of audit reports, non-conformities, corrective actions, and verification procedures.
Guidance:	The internal audit should be documented and include a range of records showing what was included, any issues (non-conformities) identified, how these were corrected and all verification procedures.
Full conformance	
The internal audit process has been documented and is functioning correctly, is effective, and useful. AND Any failings have been identified and rectified.	

2.7 Control of product and process non-conformities

2.7.1	The facility shall have a documented procedure to address non-conformities raised against this Standard.
Guidance:	Non-conformities can be related to, for example, raw material that has been declared as MarinTrust approved/accepted/recognised equivalent compliant but has been mixed with non-approved/accepted/recognised equivalent raw material, thus losing its integrity. Similarly, non-conformance can apply to marine ingredients declared as MarinTrust certified when this is not the case. Other types of non-conformances include food safety issues, loss of traceability, incorrect species labelling etc. The non-conformance/non-conformance procedure should specify what happens if one of these issues are detected.
Full conformance	
There is a written procedure for how to deal with non-conformances because of being audited against this Standard.	

2.7.2	Where nonconforming MarinTrust marine ingredients have been identified, the facility shall ensure these are fully segregated from fully conforming marine ingredients and disposed of in a legal manner where appropriate.
Guidance:	Non-conforming MarinTrust marine ingredients are those related to failures in a specific requirement of the Standard. This can include:

	• A raw material sourcing failure such as raw materials with chemical or physical contamination, or sourced from IUU fishing, or from suppliers which cannot provide all the required information and levels of assurance regarding the origin of the raw materials. • A failure in a product specific issue such as a food safety failure or loss of traceability. • A loss of eligibility for MarinTrust labelling i.e. when an approved MarinTrust raw material, or recognised equivalent, has been mixed with non-approved/non-recognised equivalent MarinTrust raw material, thus losing the integrity. Actions in the event of non-conforming products should be included in the procedure. These include: • Where marine ingredients are produced from raw materials sourced from IUU fishing or endangered species these must be completely segregated and disposed of (destroyed as stipulated by the competent authority). • In issues relating to the safety of the raw materials and marine ingredients, if the issue cannot be resolved through further processing/rework, the raw materials and marine ingredients should be segregated and disposed of. • In situations where there is a loss of traceability or mixing of approved/accepted/recognised equivalent raw materials, with raw materials from non-approved/non-accepted/non-recognised equivalent sources, the marine ingredients shall not be labelled or sold as MarinTrust certified.
Full conformance	
There is a procedure in the product management system on how to deal with identified nonconforming marine ingredients to ensure these are segregated, evaluated, downgraded, or disposed in a legal manner as applicable. AND There is evidence that nonconforming products have been segregated, evaluated, downgraded, or disposed of.	

2.7.3	The facility shall inform any customer affected by a nonconforming MarinTrust marine ingredient as soon as practicably possible, but no later than 48 hours following detection.
Guidance:	There is a procedure in the facility's management system on the product recall requirements for MarinTrust certified marine ingredients. In this procedure, there will be a list of contacts that should be informed and one of these will need to be the list of customers. The time limit for informing the customer (i.e. within 48 hours) shall be stated within this procedure. The format for contacting customers can include e-mail, phone, instant messaging, providing a record is retained of any such contact.
Full conformance	
There is a procedure for the product recall requirements for MarinTrust certified marine ingredients. which includes a time limit of within 48 hours for informing the customer. AND	

If this has happened, the facility has responded accordingly.

2.7.4	The facility shall notify their Certification Body within 24 hours of a product recall being initiated because of this nonconforming product procedure being activated.
Guidance:	There is a procedure in the facility's management system on the product recall requirements for MarinTrust certified marine ingredients. In this procedure, there will be a list of contacts that should be informed and one of these will need to be the Certification Body (CB) that awards its MarinTrust certificate. The time limit for informing the CB (i.e. within 24 hours) shall be stated within this procedure. The format for contacting CBs can include e-mail, phone, instant messaging, providing a record is retained of any such contact.
Full conformance	
There is a product recall procedure for MarinTrust certified marine ingredients which stipulates the CB that awards the facility's MarinTrust certificate must be informed within 24 hours of a product recall.	

2.8 Recall exercise

2.8	The facility shall conduct and document product recall tests annually, or after receiving a traceability-based complaint or incident test, to ensure that the nonconforming product procedure (clause 2.7.1) is functioning correctly and effectively.
Guidance:	There is a product recall procedure in the facility's management system that includes annual testing requirements. The recall test should be undertaken for each marine ingredient type produced and performed annually or after a traceability complaint that jeopardised the integrity of the marine ingredients. There are records showing that the recall tests are being conducted, including who was contacted, how it was conducted and what actions were taken as a result of the test.
Full conformance	
There are records showing that annual recall tests are conducted, including who was contacted, how it was conducted and what actions were taken as a result of the test. AND In the event of a complaint, there are records to demonstrate how this was managed and resolved.	

2.9 Correction and corrective actions

2.9	The facility shall have procedures for the determination and implementation of corrections and corrective actions in place to ensure that in the event of any nonconformities: • the potentially nonconforming products are not released • the cause of the nonconformity is identified • corrective actions are determined and implemented through root cause analysis, responsible personnel and timelines specified • the corrective action is verified to prevent this issue from happening again in the future.
Guidance:	The facility should define in a procedure how it identifies non-conformances and implements corrective actions. This should include how it undertakes root cause analysis and how it tackles any non-conformances. Root cause analysis is important to be performed in a way that guarantees that the real cause is identified, and the proper actions are taken to mitigate the problem. There are different tools for root cause analysis and determination that can be used individually or in combination. A product that is defined as non-conforming because it does not conform to specific MarinTrust requirements may be sold as non-certified MarinTrust, providing it is safe to do so. The aim of this procedure is to avoid these issues to happen again in the future.
Full conformance	
There is a written correction and corrective action procedure available which covers all the requirements stipulated in this clause.	

2.10 System update and continuous improvement

2.10.1	Senior management shall undertake regular reviews annually at a minimum, to ensure policies, plans, procedures, and systems are up-to date, effective and demonstrate continuous improvement.
Guidance:	Senior management are aware and are part of regular performance reviews to identify how this standard is implemented, the associated records required, evidence of compliance to requirements of the standard. These performance reviews may include, for example, annual meetings, or committees set up to demonstrate compliance with and progress against all areas of the standard. The evidence shall be presented as records, minutes, interviews, etc.

Full conformance
There is evidence that senior management have participated in review meetings, which have been held at least annually.

2.10.2	There shall be a documented complaints procedure that specifies: • how to record formal complaints • what resolution actions to take • what corrective actions to take to avoid recurrence • what timescales apply for resolution.
Guidance:	There can be different mechanisms to manage complaints depending on the source and the type of complaint. Separate procedures can be defined for staff, customers, and community.
Full conformance	
There is a documented complaints procedure in place that covers customers, community, and other external stakeholders. AND Complaints have been resolved in the stated timescales.	

2.10.3	The facility shall make known to the community how complaints can be submitted, how they will be resolved and complaint resolution timelines.
Guidance:	Information can be online e.g. on the facility website, or social media, etc.
Full conformance	
There is evidence the facility has communicated the complaints procedure to the community, including how the community can submit complaints, how they will be resolved and estimated resolution timelines.	

2.11 Supplier approval and monitoring

A definition of suppliers is included in the definitions document, available from the MarinTrust website. It includes suppliers of products or service used by the facility in the direct production of marine ingredients, including but not limited to raw materials, processing aids, antioxidants, packaging. A supplier of agency labour is also included if those workers are working within the facility on the production of marine ingredients.

Further information on requirements for suppliers is included in Appendix I, including for countries where facilities can only source whole fish from centrally operated purchasing systems (i.e. countries that can only purchase domestic landings through sites registered / operated by industry with regulatory oversight).

2.11.1 General suppliers

See definition of suppliers.

2.11.1.1	The facility shall have a documented and effective supplier approval and monitoring system in place.
Guidance:	The facility shall have a system for identifying and checking suppliers. This should include any measures to verify the company is operating legally and effectively. There should be an up-to-date list of suppliers and evidence of checks that have been undertaken, and that they have been approved following this assessment process. There shall be information relating to how suppliers are monitored on an ongoing basis. There shall be agreements with each supplier agreeing to the level of service provision, applicable to the type of product supplied.
Full conformance	
There is an up-to-date system for managing and approving suppliers, and those suppliers are monitored by the facility.	

NOTE: Clause 2.11.1.2 does not apply to vessels supplying whole fish. Instead, refer to Clause 2.11.2.1.

2.11.1.2	The facility shall ensure supplier agreements include a reference to their social policy or commitment, signed by the suppliers, 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.
Guidance:	Facilities are required to obtain a signed agreement from their suppliers and work with those suppliers to show how it is in place. Types of evidence from the supplier required by the facility will include policies, procedures. There shall also be evidence of how the facility has communicated with the supplier. These communications can include records of meetings between the facility and supplier, 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 suppliers on the requirements of this clause. NOTE: This clause does not apply to vessels supplying whole fish. Instead, Clause 2.11.2.1 is used.
Full conformance	
Every supplier has an agreement with all the requirements of this clause. AND There is evidence of how the facility has communicated with the supplier to verify the information.	

2.11.1.3	Facilities shall have a purchasing process in place to ensure purchased items conform to safety and legal requirements in the country in which the facility is based and the requirements of the receiving market, including: · product · packaging · additives · ingredients · technical processing aids
Guidance:	The facility can have a general purchasing process in place and can determine those products or services that are critical to maintain the integrity and food safety of MarinTrust marine ingredients produced. This is to assure that all products (including raw materials), packaging, additives, ingredients, and technical processing aids comply with food safety and legal requirements, both in the country where the facility operates and, in the countries, where the marine ingredients are sold.
Full conformance	
There is a purchasing process in place covering all products, packaging, additives, ingredients, and technical processing aids. AND	

this process includes how these comply with food safety and legal requirements, both in the country where the facility operates and, in the countries, where the marine ingredients are sold.

2.11.2 Vessels supplying whole fish (this section only applies if the facility is sourcing from vessels supplying whole fish)

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.
Guidance:	This clause requires the completion of the MarinTrust V3 – Risk assessment for whole fish vessels, which is available on the MarinTrust website The facility shall document all countries it sources from and the outcome of the risk assessment for each country. Within the risk assessment there are requirements to obtain agreements from vessels supplying whole fish. Where the rating necessitates, for each country, the facility shall have a record of the number of vessels from which it receives whole fish. At each stage of the certification cycle, there are specific targets to achieve. These targets relate to a percentage of whole fish supplying vessels from which social policies/statements must be obtained. The facility must be able to demonstrate it has obtained agreements for the respective number of vessels supplying whole fish, for each country required.
Full conformance	
The facility has completed and documented the results of the MarinTrust social responsibility risk assessment for all vessels supplying whole fish. AND Meets the specific annual target as applicable.	

2.11.2.2	For all vessels supplying whole fish, whether the vessel is owned by the facility, is supplied under an existing contract, or is not contracted, the facility shall document the following key data elements (KDEs): • vessel details including name of vessel, International Maritime Organisation (IMO)/registration number (as applicable), call sign, legal owner, name and address of legal owner, flag state • authorisation for fishing: license / permits as applicable • fishing: all permitted fishing methods, fishing gear for the vessel
Guidance:	This clause relates to the supplying vessels (suppliers) of whole fish. This information must be available for each vessel supplying whole fish.

	The KDEs are basic information required to establish a strong traceability system and to guarantee the integrity of marine ingredients produced. Refer to the MarinTrust definitions document for an explanation of each key data element. Note: examples of incomplete or inaccurate records are that some of the details are not visible or correct at the time of the audit, or that the details in the documentation have not been completed, or there is no evidence of documentation for a particular vessel.
Full conformance	
All the KDE information is clearly identified on all records relating to the suppliers of whole fish.	

2.11.3 Suppliers of by-product raw material

2.11.3.1	For by-product suppliers, (wild capture or aquaculture), the facility shall document the following key data elements (KDEs): • supplier name, address / location • permitted activity / legal entity / registered food business operation • species (including scientific name), or for mixed by-products containing more than one species, a list / description of species (including scientific name) contained in the mix
Guidance:	• Name of physical location of the supplier: Address / location: the official and actual location where the by-product supplier is situated. • Permitted activity: frozen, canning, drying, wholesale, retail, etc. • Legal entity that owns the facility where by-products are generated: Unique indicator generated by the authorities in the country of operation that gives the facility the license to operate. By-product suppliers shall provide assurance to the facility that the by-products are not derived from IUU fishing. This can be through a supplier policy, as well as through the list of species that are supplied that are not approved/accepted/recognised equivalent by MarinTrust. The facility can provide the by-product supplier with a list of MarinTrust approved raw material species which the by-product supplier can use for reference. Note: examples of incomplete or inaccurate records are that some of the details are not visible at the time of the audit. Suppliers that have changed their address or activity without affecting the by-product sourcing, there are missing records: the by-product supplier is unlicensed, or there is no evidence of documentation for a particular species.

Full conformance
All this information is clearly identified for all suppliers of MarinTrust approved by-products used within the facility.

2.11.3.2	For wild-capture by-products identified in the MarinTrust by-product assessment as having a medium risk of coming from IUU fishing activity (MarinTrust 'Approved Source with Caution'), the facility shall: · have supplier agreements for all suppliers of those by-products · obtain assurance from the suppliers that the by-products are not from IUU fishing sources · verify this information with the suppliers
Guidance:	It is important that facilities check with their suppliers regarding their raw materials particularly if there is a perceived risk of sourcing from a known or suspected IUU fishing activity. This requires checking supplier records or procedures in place to understand how the supplier can ensure there is no IUU in the raw material they provide. For raw materials risk rated medium, additional, or more frequent checks may be required until the facility is certain that the raw materials are not from IUU fishing activity. By-product suppliers shall provide assurance to the facility that by-products do not stem from IUU fishing. It is essential that a facility verifies any by-products with its suppliers. This requires the facility to check supplier records and/or procedures to understand how the supplier ensures there is no by-product from IUU fishing sources. By-product suppliers shall provide assurance to the facility that the by-products are not derived from IUU fishing. This shall be through the supplier agreement, which must include the list of species supplied. The facility should check the list of by-products sourced from each supplier to identify by-products which are approved/recognised as equivalent according to MarinTrust requirements. This list can also be checked / updated to facilitate checking of raw materials from IUU fishing. For the audit, the auditor will check how the facility manages by-products deemed medium risk. Any by-products downrated from high to medium risk will require additional verification. Refer to the byproduct assessment methodology on the MarinTrust website for further information.
Full conformance	
All this information is clearly identified on all records that relate to the suppliers of wild-capture by-products species with MarinTrust 'Approved Source with Caution' used within this facility.	

2.11.3.3	Wild-capture by-products identified in the MarinTrust by-product assessment as having a high risk of coming from IUU fishing activity shall not be sourced and the facility shall have a procedure for this in place that includes: • management/mitigation measures to exclude sourcing by-products deemed high risk • action to be taken if by-products deemed high risk of IUU fishing are identified • investigations with the suppliers of the by-products regarding the IUU fishing risk.
Guidance:	"High risk" by-products shall not be sourced by MarinTrust certified facilities. The facility shall provide evidence of procedures for excluding sourcing by-products associated with IUU fishing. It is essential that a facility verifies the sourcing of by-products with its by-product suppliers. This requires checking supplier records and/or procedures to understand how the supplier ensures there is no by-product from IUU fishing sources. By-product suppliers shall provide assurance to the facility that the by-products are not derived from IUU fishing. This shall be through the supplier agreement, which must include the list of species supplied. The facility should check the list of by-products sourced from each supplier to identify by-products which are approved/recognised as equivalent according to MarinTrust requirements. This list can also be checked / updated to facilitate checking of raw materials from IUU fishing. A new by-product assessment would be required to demonstrate the risk rating has been reduced. If by-products remain high risk, they SHALL NOT be sourced by the facility. In the event that by-products which stem from IUU fishing are sourced, these should be categorised as 'nonconforming product.' (See clause 2.7.2). The facility should initiate immediate investigations with the supplier.
Full conformance	
There is a procedure to ensure by-products having a high risk of coming from IUU fishing activity are not sourced.	

2.11.4 Third-party suppliers of raw materials

A definition of third-party suppliers is included in the definitions document available from the MarinTrust website. Further details on third-party suppliers are available in Appendix I.

2.11.4.1	MarinTrust compliant raw materials that are purchased via a third-party supplier that does not physically handle or own the raw materials shall meet all the requirements of this Section (2.11.4) including subclauses.
Guidance:	There shall be a list of third-party suppliers of raw material, which may be included as part of the list of suppliers from clause 2.11.1.1.

	The third-party suppliers are aware that they must provide information about the whole fish or by-products provided to the facility, to allow traceback of these raw materials to an approved or recognised equivalent source, or from an accepted MarinTrust FIP. The facility shall be able to show requirements of any third-party suppliers including raw materials received and associated records. If the facility does not work with third party suppliers of raw material this section 2.11.4 and subclauses does not apply.
Full conformance	
The facility has documentary evidence that third party suppliers provide all the details required. Note: If any clause in Section 2.11.4 receives a non-conformance rating, this clause 2.11.4.1 automatically is a non-conformance.	

2.11.4.2	There shall be documented evidence from the suppliers to verify the raw materials are: • whole fish from either an approved whole fish fishery and/or MarinTrust recognised equivalent fishery, or from aquaculture • by-products from approved wild capture by-product species and/or MarinTrust recognised equivalent by-product species, or from aquaculture • sourced from an accepted MarinTrust Fishery Improvement Project (FIP)
Guidance:	The third-party supplier can provide information for each type of raw material supplied to confirm it is from an approved, recognised, or accepted source. This is essential to allow traceback of raw materials to the respective source.
Full conformance	
The information applicable to the type of raw material is clearly available from all third-party suppliers of raw materials.	

2.11.4.3	The facility shall ensure it informs the third- party supplier of the requirements to maintain the product integrity status of the approved raw materials, by segregating approved raw materials from non-approved raw materials, and from raw materials from an accepted MarinTrust Fishery Improvement Project (FIP).
Guidance:	In some situations, third party suppliers collect raw materials from different sources / sites, making it impossible to segregate species. In this case, the mixed raw materials will be declared as not approved and/or recognised equivalent. When feasible, raw materials from a MarinTrust approved fishery or by-product and/or from a MarinTrust recognised equivalent fishery or by-product according to MarinTrust requirements should be fully segregated from other raw materials including raw materials from an accepted MarinTrust Fishery Improvement Project (FIP).
Full conformance	

There is evidence that all third-party suppliers have been informed of the requirement to keep raw materials from a MarinTrust approved fishery or by-product and/or from a MarinTrust recognised equivalent fishery or by-product separate from other raw materials, including those from an accepted MarinTrust Fishery Improvement Project (FIP).

2.11.4.4	The facility shall ensure third-party supplier agreements include a reference to their social policy or commitment, signed by the third-party supplier, 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 origin • freely chosen worker representation for all employees is allowed
Guidance:	Facilities are required to obtain a signed agreement from third party suppliers and work with those suppliers to show how it is verified. Types of evidence from the supplier required by the facility will include policies, procedures. There shall also be evidence of how the facility has communicated with the supplier. These communications can include records of meetings between the facility and supplier, 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 suppliers on the requirements of this clause. It is not expected that a facility undertakes a social audit of its third-party suppliers.
Full conformance	
Every third-party supplier has an agreement with all the requirements of this clause. AND There is evidence of how the facility has communicated with the third-party supplier to verify the information.	

2.12 Subcontractors

This section applies to subcontractors handling MarinTrust approved / accepted / recognised equivalent raw materials and certified marine ingredients. A definition of subcontractors is included in the definitions document on the MarinTrust website. Further guidance on subcontractors is included in Appendix II.

2.12.1	The facility shall have a documented, effective approval and assessment system for subcontractors in place.
Guidance:	The facility shall have a system for identifying and checking subcontractors. This should include any measures to verify the company is operating legally and effectively. There should be a list of subcontractors and evidence of checks that have been undertaken, and that they have been approved following this assessment process. There shall be information relating to how subcontractors are monitored on an ongoing basis. There shall be agreements with each subcontractor agreeing to the level of service provision, applicable to the type of product supplied. The facility must assess their own subcontractors. The CB will NOT be auditing any subcontractor premises. The auditor will need to see evidence of how the facility manages subcontractors.
Full conformance	
The facility has an up-to-date documented system for assessing and approving subcontractors and be able to demonstrate its effectiveness.	

2.12.2	The facility shall have a signed agreement with all subcontractors handling the MarinTrust approved raw materials and compliant marine ingredients.
Guidance:	n/a
Full conformance	
The facility evidence signed agreements with all subcontractors.	

2.12.3	This subcontractor agreement shall ensure that the subcontractor has documented systems in place to ensure full traceability, segregation, and identification of the MarinTrust compliant raw materials and marine ingredients.
Guidance:	This applies to any subcontractor handling MarinTrust approved raw materials and compliant marine ingredients in its own facility / location, using its own management system. The subcontractor has complete responsibility during the subcontracted service.
Full conformance	

The facility has verified with the agreement that all subcontractors used have a documented system in place to maintain the facility's raw materials and marine ingredients integrity during all the steps in charge of the subcontractor. This includes procedures to ensure full traceability, segregation, and permanent identification.

2.12.4	The facility shall ensure subcontractor agreements include a social policy or commitment, signed by the subcontractor, 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, prison 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 origin • freely chosen worker representation for all employees is allowed.
Guidance:	Facilities are required to obtain a signed agreement from subcontractors and work with those subcontractors to show how it is verified. Types of evidence from the subcontractor required by the facility will include policies, procedures. There shall also be evidence of how the facility has communicated with the subcontractor. These communications can include records of meetings between the facility and subcontractor, 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 subcontractors on the requirements of this clause. It is not expected that a facility undertakes a social audit of its subcontractors.
Full conformance	
Every subcontractor has an agreement with all the requirements of this clause. AND There is evidence of how the facility has communicated with the subcontractor to verify the information.	

2.12.5	The facility shall maintain an up-to-date record of the names and addresses of all approved subcontractors handling MarinTrust compliant marine ingredients and the identity of the certified finished products.

Guidance:	n/a
Full conformance	
There is an up-to-date list of all subcontractors including the names and addresses.	

2.12.6	Subcontractors undertaking the full production process on behalf of the facility shall be certified to this standard.
Guidance:	This applies in situations where the facility uses the services of a subcontractor to undertake the full marine ingredients production process on its behalf. The facility has supplied the subcontractor with the all the raw materials and ancillary supplies. The facility using the services of the subcontractor should also be MarinTrust CoC (Chain of Custody) certified.
Full conformance	
The facility has subcontractors undertaking full production process on its behalf and those subcontractors are certified to this MarinTrust standard.	

If a subcontractor who undertakes part of the production process has MarinTrust Chain of Custody certification, the remainder of this section (clauses 2.12.7 to 2.12.10) does not apply.

2.12.7	Subcontractors shall conform with the relevant requirements of this Standard.
Guidance:	Subcontractors shall conform to section 4 and applicable subclauses. Facilities shall communicate with subcontractors on the specific requirements and shall have evidence of what this includes. This can include how they have communicated requirements, how those are verified (e.g. on-site checks, audits).
Full conformance	
Subcontractors are compliant with all relevant requirements of the MarinTrust standard, i.e., storage, identification, segregation, and traceability.	

2.12.8	The facility shall undertake assessments of subcontractors.
Guidance:	The facility can determine the frequency and type (remote or on site) of subcontractor assessments depending on the type of subcontractor, the role of the contractor, the volume of material handled, the number of contracted services and the location. For critical subcontractors i.e. those involved in undertaking part of marine ingredient production, the assessment should be at least each year.
Full conformance	
The facility undertakes assessments of subcontractors in the frequency established in its procedures.	

2.12.9	If third-party storage facilities are used, the facility shall have the ability to request records from the subcontractor storage facilities to allow for verification at any point in time.
Guidance:	This can be shown by the facility asking for information or performing a traceability test of the products stored, including a stock report revision. The facility can also undertake an onsite visit at the subcontractor with product sampling.
Full conformance	
The facility can demonstrate it can request records from the subcontractor storage facilities to allow for verification at any point in time.	

2.12.10	Where a facility utilises the services of subcontracted transport companies, an agreement or equivalent documentary evidence shall be in place demonstrating that the safety, traceability, and integrity of MarinTrust raw material and marine ingredients is ensured during transportation.
Guidance:	The transport can be assured through different mechanisms such as global positioning system (GPS) route controls, reports of previous cargoes, cleaning records, weighing controls, drivers' assessment, etc.
Full conformance	
The facility has written agreements or documentary evidence that the services of subcontracted transport companies assure the safety, traceability, and integrity of MarinTrust raw materials and certified marine ingredients.	

2.13 Testing facilities

2.13	Testing laboratories shall be approved by one of the following methods: • accredited by a nationally recognised accreditation authority according to EN/ISO-17025; or • validated by taking part in relevant ring tests
Guidance:	Testing laboratories with accreditation or validation by taking part in relevant ring tests shall be used by the facility for those analysis or tests that are related to contractual, commercial, or sanitary regulation compliance. If there are internal agreements between producer and customer, results from internal laboratories without accreditation can be considered for contractual agreements. Facilities can manage internal control process laboratories without approvals, only for reference analysis and tests.
Full conformance	
The facility can provide an authentic and up-to-date accreditation certificate for the test laboratory or evidence that the testing lab participates in a ring testing program for the main relevant analysis.	

2.14 Use of the MarinTrust certification logo or Improver Programme claim

2.14.1	The facility shall only use the MarinTrust certification logo if it has valid certification to this Standard and it has a written approval to use the MarinTrust logo.
Guidance:	The MarinTrust logo shall only be used in accordance with the guidance on MarinTrust Logo use. Refer to MarinTrust website for further details. If this is an initial audit the facility must not have used or be making any claim relating to MarinTrust certification, until it has successfully achieved the required certification and has permission from MarinTrust to do so.
Full conformance	
The facility is certified to this standard and eligible to use the MarinTrust logo. AND The facility has written confirmation / permission from MarinTrust to do so.	

2.14.2	The facility shall follow the current MarinTrust logo guidelines for any logo used on its products.
Guidance:	Refer to MarinTrust Logo use guidance for further details.
Full conformance	
The facility is fully compliant with the MarinTrust logo rules and guidance.	

2.14.3	The facility shall operate a secure system for the production, storage and application of product labels bearing the MarinTrust logo to ensure that only compliant marine ingredients are labelled as such.
Guidance:	The secure system can be a dedicated place with limited access where product labels are stored. Additionally, a responsible person should be defined to manage this areas and labels. In cases where the labels are produced in electronic devices this person should be trained on how to produce the proper labels to the corresponding marine ingredient.
Full conformance	
The facility shall have a documented product management system and effective traceability to ensure that the MarinTrust logo is only used on compliant marine ingredients. The production, storage, and application of marine ingredients labels is secure and clearly managed.	

2.14.4	**Improver Programme claims** Where raw material is sourced from an accepted MarinTrust Fishery Improvement Project, the facility shall only use the MarinTrust Improver Programme claim on the marine ingredients, if it has documented approval to do so from MarinTrust.
Guidance:	If marine ingredients contain raw material from an accepted MarinTrust Improvement Project, the MarinTrust Logo must not be used on these products. If marine ingredients contain any raw materials sourced from an accepted MarinTrust FIP, the MarinTrust Logo shall not be used on these marine ingredients. Mixing or blending of raw materials from a MarinTrust FIP with approved/recognised equivalent raw materials automatically causes the whole of those mixed raw materials to be classed as sourced from an accepted MarinTrust FIP. This clause is not applicable if the facility does not source any raw materials from an Improver Programme (IP).
Full conformance	
The facility is fully compliant with the MarinTrust IP claim rules and guidance. AND The facility shall have a documented product management system and effective traceability to ensure that the MarinTrust IP claim is only used on IP compliant marine ingredients.	

Section 3: Responsible raw material sourcing practices

Information on the raw material tolerance levels for species which are non-assessed / non-approved is included in Appendix IV.

3.1 All raw materials

3.1	All raw material shall meet the following criteria (as applicable to the raw material format) in order for it to be eligible for use as approved raw material.
Guidance:	In addition to being assessed and approved or accepted by MarinTrust (as covered in Section 1), raw material sourcing must be verified as part of the factory audit. The requirements for each type of raw material depend on whether it is a whole fish or by-product, whether it is from wild capture or from aquaculture. it is essential that raw materials approved or accepted for the purposes of MarinTrust certification, meet the requirements of Sections 3.1 and/or 3.2 (as applicable). The requirements will vary according to the type and source of the raw material. The auditor shall go through the clauses in this section 3 in detail and rate this clause 3.1 last. The rating of this clause 3.1 is dependent on how the rest of Section 3 is rated.
Full conformance	
Whole fish raw material meets all the requirements of section 3.2. AND/OR By-product raw material meets all the requirements of Section 3.3 (as applicable).	

3.2 Whole fish raw material

3.2.1	Whole fish raw material shall be traceable to a MarinTrust approved fishery / fisheries, and/or MarinTrust recognised equivalent fishery.
Guidance:	This clause applies to whole fish raw materials that are in the facility's application form and within the MarinTrust certification scope.
Full conformance	

The facility has procedures and documented evidence to prove that all certified marine ingredients are produced from whole fish raw materials sourced from a MarinTrust approved fishery and/or from a MarinTrust recognised equivalent fishery.

3.2.2	For whole fish raw materials sourced from a MarinTrust Fishery Improvement Project, the whole fish shall be traceable to the MarinTrust Fishery Improvement Project to be eligible for Improver Programme claims.
Guidance:	This clause applies to whole fish raw materials sourced from a MarinTrust Fishery Improvement Project that are in the facility's application form and within the scope of MarinTrust certification. The raw materials from an Improvement Project shall be considered as accepted by MarinTrust.
Full conformance	
The facility can demonstrate it has procedures and documented evidence to prove that the whole fish material used to produce MarinTrust Improver Programme marine ingredients can be traced back to the MarinTrust Improvement Project they were sourced from.	

3.2.3	The inclusion of whole fish is accepted on the basis that it complies with the relevant preceding sections, including subclauses, of this Standard (Clause 2.11.1, 2.11.2 and 2.11.4 as applicable).
Guidance:	As part of the check on whole fish raw materials, it is essential that there is information about the suppliers of those whole fish. The type of supplier of whole fish dictates which of the Sections 2.11.1, 2.11.2 and 2.11.4 apply. The auditor should refer back to these sections/clauses in Section 2 and confirm that the requirements for whole fish suppliers are in place. The rating of this clause 3.2.3 is dependent on how clauses in Sections 2.11.1, 2.11.2 and 2.11.4 are rated.
Full conformance	
Sections 2.11.1, 2.11.2 and 2.11.4 as applicable are in full conformance.	

3.2.4	The facility shall provide documentation that all whole fish are legally sourced and vessels are authorised for relevant fishing activity(ies).
Guidance:	This requirement is applicable only to whole fish within scope of certification. This includes whole fish from a MarinTrust approved fishery and/or from a MarinTrust recognised equivalent fishery and/or from an accepted MarinTrust Fishery Improvement Project (FIP) according to MarinTrust requirements The facility can provide documentation that all the whole fish within scope of certification are legally sourced.

	In this clause 'legally sourced' refers to the link between the catch of whole fish and the vessel which has caught it. That each batch of fish is caught by a registered vessel which is compliant with official controls relating to catching, landing, labelling, and selling etc.
Full conformance	
The facility has documentation demonstrating the legality of all whole fish raw materials.	

3.2.5	The details of each consignment of whole fish landed from a vessel shall be recorded and include the following key data elements (KDEs): · date of discharge · species (including scientific name) and quantity discharged to the facility · catch areas where catch originated · catch date (this can include date of fishing, dates of specific fishing trip, dates at sea during which the consignment was caught) · fishing method / gear used for the catch of fish (if the vessel is multi rig)
Guidance:	Section 2 referred to information about the supplier / supplying vessel. The information required in this clause is specifically required for each consignment or landing of whole fish from each vessel or supplier. ALL of the KDEs listed in this clause must be fully recorded. If only one KDE is missing or not in 'full conformance' the whole clause is rated as a non-conformance. Refer to definitions document on the MarinTrust website for an explanation of each KDE.
Full conformance	
The facility has records of each landing of whole fish sourced from a MarinTrust approved fishery and/or from a MarinTrust recognised equivalent fishery and/or from an accepted MarinTrust Fishery Improvement Project (FIP) that includes all the stated KDEs. - date and location of discharge from the fishing vessel. In the case of discharge operation within the same day, start and end hours should be recorded. AND - The species Latin name of each species and the quantity discharged for each species. AND - details of the catch area. AND - dates the fishing vessel was actively fishing. AND	

- the fishing gear used by the fishing vessel to catch the fish.

Note
If the fishery regulations states that each landing must be overseen by the national control body which has jurisdiction over the fishery, these records should be available as well for all whole fish used by the facility.

In most cases the facility will have to record the landing by weight and species and report this back to the regulatory authorities if an inspector is not present at the time of landing.

3.3 By-products

3.3.1 By-products from wild capture

3.3.1	By-products from wild capture species shall be traceable to a MarinTrust approved by-product species, and/or MarinTrust recognised equivalent by-product species.
Guidance:	This clause applies to by-product raw materials that are in the facility's application form and within the MarinTrust certification scope. Facilities may still source other raw materials, but they must not be used in marine ingredients which are labelled or sold as MarinTrust certified.
Full conformance	
There are procedures and documented evidence to prove that all by-product raw materials are MarinTrust approved by-products and/or from a MarinTrust recognised equivalent by-product according to MarinTrust requirements.	

3.3.2 By-products from wild capture or farmed origin

3.3.2.1	By-products must comply with the relevant preceding sections, including subclauses, of this Standard (Clause 2.11.1, 2.11.3 and 2.11.4 as applicable).
Guidance:	This clause applies to by-product raw materials that are in the facility's application form and within the MarinTrust certification scope.
Full conformance	
Sections 2.11.1, 2.11.3 and 2.11.4 are in full conformance.	

3.3.2.2	Raw material originating from suppliers may only be used to produce marine ingredients if it meets the following criteria: • the by-product come from species that are intended for human consumption or pet food, evidenced in a documented policy provided by the facility • the facility is able to trace the origin of material back to the supplier and / or handler
Guidance:	Additionally, the by-product should comply with regulatory/sanitary requirements in the country of operation and destination country.
Full conformance	
The facility has a policy that has been provided to each supplier of by-products, that the by-products must only be sourced from fish intended for human consumption or pet food production. AND Each supply of by-product is a MarinTrust approved by-product and/or from a MarinTrust recognised equivalent by-product according to MarinTrust requirements that can be traced to a supplier or handler, for which the facility has an agreement in place.	

3.3.2.3	The details of each consignment of by-products from a supplier are recorded and include the following key data elements (KDEs): • Supplier name and/or handler name • Species (including scientific name), or for by-products containing more than one species, a list / description of species (including scientific names) contained in the mix • Date of production and/or of dispatch from the supplier.

Guidance:	ALL of these requirements must be fully met. If only one item is missing or not in 'full conformance' the whole clause is rated as a non-conformance. • Name of physical location of the supplier and/or handler/collector name. • Species (including scientific name), or for by-products containing more than one species, a list / description of species (including scientific names) contained in the mix: when there is different documentation related to the specific consignment, the scientific name is not mandatory to be stated in every separate document but there should be a master list or equivalent document to relate the common name to the scientific name through all the records. • Calendar start and end dates when the by-products are produced and/or dispatched from the supplier to the facility. By-product suppliers shall provide assurance to the facility that the by-products are not derived from IUU fishing. This can be through a supplier policy, as well as through the list of species that are supplied that are not approved/not accepted/not recognised equivalent according to MarinTrust requirements. The facility can provide the by-product supplier with a list of MarinTrust approved / recognised sources which the by-product supplier can use for reference.
Full conformance	
There are records of each consignment of MarinTrust approved by-product and/or MarinTrust recognised equivalent by-product. AND The records include details of the company which supplied the by-products. If the supplier is an intermediate i.e. third-party handler/collector, those details must be included. AND The records include the species scientific (Latin) name. If multiple species are included in the consignment, there shall be a list or description of each species. AND The records include the date the by-products were dispatched from the supplier. OR the records show the date the supplier produced the by-products.	

3.3.3 By-products and other raw fishery materials from aquaculture species

3.3.3.1	Raw material originating from aquaculture (farm) may only be used to produce marine ingredients if it meets the following criteria:

	• the aquaculture raw material shows no clinical signs of disease on the day of receipt • the aquaculture raw material does not come from a farm which is subject to a prohibition for animal health reasons and has not been in contact with animals from such a farm.
Guidance:	By-product from aquaculture species should comply with regulatory/sanitary requirements in the country of operation and the marine ingredients produced should comply with regulatory/sanitary requirements in the destination country. Raw materials from aquaculture must be listed on the facility's application form.
Full conformance	
The facility has a policy that has been provided to each supplier of raw materials sourced from aquaculture, that the raw materials must not be sourced from aquatic species showing any clinical sign of disease. AND That the raw materials are not sourced or mixed with other animals, from aquaculture with a prohibition in place for any animal health reasons.	

3.3.3.2	The species of aquaculture raw material shall be clearly labelled including where they are mixed with other MarinTrust approved raw materials, raw materials from accepted MarinTrust Fishery Improvement Projects and the marine ingredients produced.
Guidance:	This is a particularly important requirement to ensure aquaculture species used in production are clearly identified to avoid their use in marine ingredients destined for feed for the same species. Where marine ingredients are produced from aquaculture species, it is recommended that the facility has additional/final check at point of dispatch to verify that is acceptable to the customer.
Full conformance	
The facility has a procedure for labelling raw materials sourced from aquaculture, including where these are mixed with raw materials from wild capture species.	

Section 4: Responsible traceability practices

4.1 Product management system

4.1	The facility shall have a documented product management system in place to demonstrate how MarinTrust approved raw materials are identified and, where applicable, segregated from accepted MarinTrust Fishery Improvement Project raw materials and/or non-approved raw materials.
Guidance:	The facility may receive fully approved MarinTrust raw materials, raw materials which are recognised as equivalent, and raw materials from a MarinTrust Improver Programme, as well as from non-MarinTrust sources i.e. non-approved, uncertified, no equivalency recognition. In this situation the facility's product management system should define how to proceed when different raw materials are received at the same time and there is not enough capacity to guarantee a segregation and processing separately. When mixing of approved/accepted/recognised equivalent sources with non-approved/non-accepted/non-recognised equivalent occurs, the mixed raw materials shall be downrated to non-approved/non-accepted/non-recognised equivalent.
Full conformance	
The applicant has a demonstrably effective product management system in place to identify and, where applicable, segregate MarinTrust approved raw materials from raw materials from a MarinTrust FIP and non-approved material.	

4.2 Traceability information and records

4.2.1	All traceability information shall be documented and records maintained.
Guidance:	This should be included within the requirements of Section 2.4 (document management and control) and subclauses. The facility should have a system to show how it manages traceability information.

	The procedure should be written but can be available in a hard copy (written) or digital format. This procedure can be complemented with other information systems or ERPs which have their own internal procedures and modules.
Full conformance	
The facility has a traceability information procedure in place.	

4.2.2	For each supply of raw material, records shall contain the following information: • for whole fish supplies, information shall include the key data elements (KDEs) referred to in Sections 2.11.2.2 and 3.2.5 and their subclauses • for by-product supplies, information shall also include the key data elements (KDEs) referred to in Sections 2.11.3.1 and 3.3.2.3 and their subclauses For both whole fish and by-products: · date of receipt · volume or weight of MarinTrust approved raw materials received · identification number for the MarinTrust approved raw materials (i.e. lot / batch number)
Guidance:	ALL of these requirements must be fully met and assessed in the correspondent Sections, clauses, and subclauses. See Definitions document from the MarinTrust website for an explanation of each KDE (Key Data Element).
Full conformance	
The records include date of receipt from the fishing vessel or other sources to the facility. In the case of receiving raw materials from different operations within the same day, start and end hours should be recorded. AND The records state the volume or weight received for each type of raw material (i.e. from a MarinTrust approved fishery or by-product and/or from a MarinTrust recognised equivalent fishery or by-product and/or from an accepted MarinTrust Fishery Improvement Project (FIP) according to MarinTrust requirements, and from other sources). AND Calibrated scales have been operated to determine the weight, and where applicable, official controls systems have been applied. AND	

All raw materials from a MarinTrust approved fishery or by-product and/or from a MarinTrust recognised equivalent fishery or by-product received by the facility are identified with a unique identification number, which can be a lot or batch number, and different from other raw materials (i.e. from an accepted MarinTrust Fishery Improvement Project (FIP) according to MarinTrust requirements, or other sources).

4.2.3	The facility shall maintain accurate records of the quantities / volumes of: · all raw materials (including those which are MarinTrust approved, from Improver Programme and non-approved sources) · all marine ingredients (including those which are MarinTrust approved, from Improver Programme and non-approved sources) which are bought and sold (or received and dispatched).
Guidance:	These records should include quantities per species to identify: - raw materials from a MarinTrust approved fishery or by-product and/or from a MarinTrust recognised equivalent fishery or by-product and/or from an accepted MarinTrust Fishery Improvement Project (FIP) according to MarinTrust requirements. Other sources should also be identified. - quantities per type of marine ingredient to identify those which are produced from different raw material types (i.e. MarinTrust approved fishery or by-product and/or from a MarinTrust recognised equivalent fishery or by-product and/or from an accepted MarinTrust Fishery Improvement Project (FIP)). And any other sources. - information about the movements of raw materials and marine ingredients in and out of the facility.
Full conformance	
There are weight records for all types/sources of raw materials received and marine ingredients received and dispatched. AND The records are accurate.	

4.3 Segregation and labelling

4.3	MarinTrust approved raw materials and compliant marine ingredients shall be segregated and labelled or otherwise identified in a manner that ensures traceability is maintained during the following key traceability steps: • from the point of receipt • initial storage • processing • work in progress storage • packaging (including identification number of the lot / batch)

	• final storage (including third-party storage) • transportation • final dispatch and handling • delivery to the customer.
Guidance:	For this clause, the completion of the MarinTrust V3 – Traceability exercise template is required. This will be completed during the audit by the facility and reviewed / revised by the auditor.
Full conformance	
The traceability process is fully documented and ensures information remains with the raw materials and marine ingredients throughout the whole process.	

4.4 Mass balance

4.4	Mass balance exercises, taking into account conversion rates and production practices that could affect the final quantity or volume calculations, shall be completed for each raw material (including those which are MarinTrust approved, from Improver Programme and non-approved sources).
Guidance:	This links with the requirements for the internal audit. Facilities can complete the MarinTrust V3 factory standard – Mass balance template or provide their own, whichever is most effective. If a facility provides its own, it must include all the information required in the MarinTrust template. Conversion rates must be applicable to the types of raw materials, based on available data.
Full conformance	
The facility has a mass balance exercise for each raw material type used to ensure that it can be reconciled with the amount of this raw material used and the amount of marine ingredients that it produced. AND The mass balance template is completed for the audit.	

Section 5: Good manufacturing practices

A facility can demonstrate good manufacturing practices (GMP) through other means, for example, through recognised certification to another standard or third-party audit. Where applicable, these separate approvals/certifications may be used to demonstrate compliance to certain parts of this Section 5. These separate approvals/certifications are specified in the section headings (5.1, 5.2).

A facility with certification approved as equivalent by MarinTrust recognition procedures shall meet all the requirements of section 5.1.

For auditing purposes, facilities must be able to show copies of their certificates and scope to the auditor.

Refer to the MarinTrust website for further information on the recognition procedure and for a list of recognised standards / certifications.

5.1 A facility with certification approved as equivalent by MarinTrust recognition procedures

A facility with certification approved as equivalent by MarinTrust recognition procedures shall meet all the requirements of Section 5.1.

5.1.1	Certification shall be administered by one of the following: • a Certification Body with its scope of accreditation that includes the recognised equivalent • a standard certification process that has been approved by the MarinTrust equivalency procedure • a standard that is recognised by a benchmarking tool that has been approved by the MarinTrust equivalency procedure
Guidance:	It is essential that the equivalent certification is already in place before the MarinTrust audit is scheduled/completed. The facility must be able to demonstrate to the auditor which of the three options applies. This should be through evidence or documentation. For standards recognised as equivalent by MarinTrust, details should be available from the MarinTrust website.
Full conformance	
There is documented evidence including one of the following: • The accreditation certificate of the Certification Body, • The standard is listed on the MarinTrust website as equivalent.	

The standard is listed on the website of a benchmarking tool, approved by MarinTrust as equivalent (this benchmarking tool must also be listed on the MarinTrust website).

5.1.2	Current and valid certificates shall be available for each site registered on the MarinTrust application form that wishes to be certified to this Standard.
Guidance:	All facilities / sites assessed by MarinTrust shall be included in the certification recognised by MarinTrust. (as evidenced in Clause 5.1.1) The auditor will make a note of the certificate number and the certificate validation dates for each site.
Full conformance	
There is valid and current certification for all sites assessed.	

5.1.3	The outcome of external inspection and surveillance audits to the recognised equivalent standard shall be made available including: • reports of the performance • outcome • nonconformities • corrective actions associated with assessments conducted by the appointed Certification Body
Guidance:	The audit process performed according to the recognised standards shall follow a certification cycle including annual surveillance audits and recertification. In each audit, reports, outcomes, nonconformities, and corrective actions where applicable, shall be made available to the auditor. As part of the factory inspection, the auditor will review that any nonconformance raised in the report has been actioned and still being adhered to.
Full conformance	
All the clauses have been assessed to demonstrate a full audit has been completed. AND All non-conformances raised in the report have been closed off and accepted by the certification body.	

5.2 A facility without certification to a standard recognised as equivalent by MarinTrust recognition procedures

5.2	A facility without certification to a standard approved as equivalent by MarinTrust recognition procedures shall meet the requirements of clause 5.3 and all sub-clauses. If the facility does not have certification to a standard approved as equivalent by MarinTrust recognition procedures, but has a third-party HACCP certification, it shall be excluded from being audited against requirements of clause 5.4 including all clauses and sub-clauses.
Guidance:	Where there is no equivalent certification in place BUT the facility has third-party Hazard Analysis and Critical Control Points (HACCP) certification, this facility must be audited against section 5.3 but NOT section 5.4 and subclauses. The auditor is required to check the pre-requisites before Section 5.4 to determine if there are specific additional issues regarding feed and/or human consumption marine ingredients. The facility shall have separate HACCP plans for marine ingredients destined for food and / or feed to cover and control all the risks associated with each type of product. However, if the sanitary authority in the country permits it to be the same (food / feed) then the need for separate HACCP is not required. The auditor should note that this is the case.
Full conformance	
The auditor will check the HACCP audit report to ensure a full audit has been completed. AND All the non-conformances have been closed.	

5.3 Operational pre-requisites for GMP programmes

5.3.1 Structure and facilities

5.3.1.1	Facilities and equipment shall be designed to allow appropriate cleaning and disinfection and managed to avoid risks to the safety of the staff, raw materials, and marine ingredients.
Guidance:	n/a
Full conformance	
All facilities and equipment must be constructed of a material that is impervious and readily cleanable. AND All equipment that comes into direct contact with the raw material, products in process and marine ingredients as final product must be constructed of an impervious material that will facilitate cleaning and disinfection where appropriate.	

5.3.1.2	All conveying, piping, storage tanks, bins and processing containers shall be made of smooth, impervious, non-toxic materials, and managed to reduce the risk of product contamination.
Guidance:	Due to the nature of marine ingredients production facilities, some exterior metal pipes/tanks may show signs of corrosion which will be acceptable if it does not contaminate the raw materials, semi-finished or finished products. The primary areas to be reviewed will be those conveyors, pipes, storage, and processing containers that have direct contact with the raw material, the semi processed materials and the marine ingredients.
Full conformance	
All conveying, piping, storage tanks, bins and processing containers are made of smooth, impervious, non-toxic materials, and managed with no evidence of product contamination.	

5.3.1.3	Facilities shall be designed to reduce the risk of contamination of raw material from semi and fully processed marine ingredients, particularly post critical control process points (i.e. heat treatment) designed to eliminate microbiological hazards in marine ingredients.
Guidance:	The facility shall have been designed with a logical process flow post critical control points (CCP) to ensure there are no cross over points that may allow the semi and finished marine ingredients to be cross contaminated by the raw material, and to avoid microbiological growth post CCP due to condensation or organic matter accumulation.

Full conformance
The process flow post CCP prevents cross contamination of finished products with the raw materials and semi processed products. AND Post CCP has no conditions for e.g. condensation and organic matter accumulation.

5.3.1.4	There shall be effective lighting (natural or artificial) to ensure activities can be undertaken safely and efficiently.
Guidance:	n/a
Full conformance	
The lighting in all parts of the facility is sufficient to allow for good cleaning, operational practices, and pest detection	

5.3.1.5	There shall be systems in place to reduce the risk of physical contamination from potential physical contaminants such as metal, plastics, and glass.
Guidance:	The facility shall have in place system(s) to remove physical contaminants e.g. for metal, some magnets need to be adopted in the facility's production line prior to final bagging or storage. For other forms of physical contaminants e.g. plastics or other non-metallic particles etc. a filtering system should be incorporated. The glass can be shatterproof in construction, or it is covered with a protective plastic film or cover. There must be evidence of a glass register if glass is present within the facility production areas.
Full conformance	
There are systems in place to remove or avoid physical contaminants e.g. metal, plastics, other non-magnetic particles, glass, etc.	

5.3.2 Intake of raw fishery material

5.3.2.1	Holds, containers and equipment of receiving vessels and overland transporters used for fishery raw materials shall be maintained in a clean and hygienic condition.
Guidance:	The facility shall have a designated cleaning schedule and processes in place to ensure that all areas are cleaned on a regular basis. The raw material silos, holds and containers shall as a minimum be cleaned on a weekly basis. The delivery vehicles and skips shall as a minimum be cleaned after their contents have been unloaded into the facility.

Full conformance
There are records of inspection and cleaning for holds, containers, equipment of receiving vessels and overland transporters

5.3.2.2	There shall be appropriate facilities to receive, off-load and store raw material from vessels and overland transportation before processing, to prevent access by for example birds or ground pests, as well as contamination and risks to marine ingredients safety.
Guidance:	The facility shall have enough capacity to ensure that the volume of raw materials to be stored is maintained in good conditions prior to being processed. If it cannot be placed into a storage due to excessive capacity, or the storage will be systematically for long time, the raw material shall be stored in a suitable refrigerated systems or storage facility until it can be moved to the process. Additionally, these receiving and storing facilities show means to maintain these areas free of birds or other flying or ground pests, due to closed areas, nets, insects control systems, etc.
Full conformance	
The areas for raw material storage are maintained in good condition. AND These receiving and storing areas are free of birds or other flying or ground pests through use of enclosed areas, nets, insect control systems, etc.	

5.3.2.3	Dosing systems for additive inclusion shall be calibrated by competent persons and provide the correct and effective dosing levels for these approved additives at all times.
Guidance:	Additives included for raw material preservation shall be approved by national competent authorities and be suitable for the determined use. For example, additives approved only for feed grade use shall not be used to produce human consumption marine ingredients. The dosing levels should be checked, and staff training records should be reviewed to ensure they understand what actions they should be doing and to prove competence.
Full conformance	
Additives included for raw material preservation are approved by national competent authorities. AND Dosing levels are checked and there are training records for personnel to ensure they have a proper understanding and competence.	

5.3.3 Layout of premises, including zoning and workspace

5.3.3.1	Marine ingredient storage areas shall be:

	· designed, constructed, and managed to prevent product contamination · kept dry and ventilated to prevent condensation
Guidance:	When the national authorities and the weather permit an open warehouse, the product should be protected against adverse conditions e.g. by covers, screening or other means. The store is equipped with either passive or mechanical ventilation and the products should be stored in a manner to facilitate good air circulation, i.e. placed off the floor away from the walls and have sufficient spaces between batches of product.
Full conformance	
Storage areas are constructed to facilitate cleaning and prevent pest activity.	

5.3.3.2	Vehicles used to load and unload marine ingredients shall be managed through proper maintenance and hygiene to prevent contamination of product.
Guidance:	The facility can use vehicles that have transported other cargoes, providing there are proper cleaning and disinfecting procedures to avoid contamination or prevent loss of traceability.
Full conformance	
All vehicles used for this purpose have inspection and cleaning records. AND If vehicles normally used for this function are used in other parts of the facility, there shall be evidence that those vehicles are cleaned and inspected before they are allowed in contact with marine ingredients.	

5.3.3.3	Loading shall not be carried out in conditions which will adversely affect the raw materials or marine ingredients materials being handled.
Guidance:	The facility should have measures to show how they assess the loading conditions e.g. the weather and put in place additional measures prior to the loading of bulk fish meal or unloading of raw material. The auditor will make a physical review of the loading operations to ensure that inclement weather conditions cannot contaminate the finished product.
Full conformance	
There are measures in place to protect raw materials and marine ingredients during loading. Examples include enclosed loading areas, screens, protective curtains.	

5.3.3.4	Transport (vessel holds, road/rail containers) shall be adequately controlled through hygiene procedures, inspection checks and records at loading with specific regard to cleanliness and absence of moisture or potential contamination.
Guidance:	All means of transport must be constructed of a material that is imperious and readily cleanable. All transport and related equipment shall need to be designed to ensure that they are cleanable and do not pose a health and safety risk to the staff operating within the facility. The auditor shall check that hygiene procedures, inspections and checks are being in place and cleaning records are maintained.
Full conformance	
There is evidence of hygiene procedures, inspections, and checks in place. AND Inspection and cleaning records are maintained.	

5.3.3.5	For bulk transported material, internal procedures and contractual agreements shall also include provisions that preclude the use of transport that may adversely affect the safety and/or integrity of any MarinTrust compliant marine ingredients due to the composition of a previous cargo.
Guidance:	The facility must have documented evidence that the three previous loads carried in the vehicles will not adversely affect the safety or quality of the marine ingredients. This applies to marine ingredients transported in bulk.
Full conformance	
There are records that show that three previous loads will not adversely affect the safety or quality of the marine ingredients transported in bulk.	

5.3.3.6	Where the conditions of transport may present a risk to contamination, loading shall not take place until a thorough risk assessment, appropriate tests and corrective actions have taken place to ensure that marine ingredients shall not be adversely affected.
Guidance:	Due to risks of contamination through poor loading practices or through deliberate mistakes. It is good practice if additional sampling at origin and destination is undertaken to ensure that no adulteration has been made during transport, especially with fish oil in bulk. In these transport operations, own staff, third party surveyors or inspections companies could be used to assure good transport practices.
Full conformance	
The facility has conducted a risk assessment to ensure that the transport processes do not pose a safety risk to the product or the staff conducting this operation. AND There are procedures in place to prevent loading until risks of contamination have been reduced.	

5.3.4 Staff facilities

5.3.4.1	Staff handwashing facilities shall be available, including in all bathrooms, to include hot or temperature-controlled water, cold running water, hand drying facilities, soap, hand sanitiser / disinfectant.
Guidance:	Staff handwashing facilities are available and, in enough number, to cover staff needs per shift. If country regulations exist regarding the number of bathrooms per quantity of persons, the facility shall cover this minimal requirement.
Full conformance	
There is availability of hot water where conditions and regulations require them. AND There is also hand drying facilities, soap, and hand sanitiser / disinfectant.	

5.3.4.2	Handwashing facilities at entry points to production areas shall include non-hand operated taps.
Guidance:	n/a
Full conformance	
Handwashing facilities are available at entry points to production areas where necessary as defined in the risk assessment. AND Handwashing facilities include non-hand operated taps to avoid cross contamination.	

5.3.4.3	Suitable and sufficient changing, rest and catering facilities shall be provided for all staff.
Guidance:	This should include places for employees to store external and working clothes, adequate space to take breaks or eat meals.
Full conformance	
There are adequate changing, rest and catering areas for staff use.	

5.3.4.4	Food preparation and serving areas shall comply with workplace food safety requirements.
Guidance:	If the facility has food preparation and serving areas, these areas should comply with GMP and food safety requirements. That includes own staff or if the facility has subcontracted services.
Full conformance	

There shall be records of compliance with workplace safety / inspection requirements.

5.3.4.5	There shall be designated areas for staff to hygienically store and consume their own food items.
Guidance:	n/a
Full conformance	
There are specific areas for employees to hygienically store and consume their own items. Note: This can be within catering areas.	

5.3.4.6	The facility shall ensure potable drinking water is available for all employees and any food or beverages it provides to employees are nutritious and safe to eat and/or drink.
Guidance:	The facility should provide potable drinking water for all the staff, and this water should be available at any time. This can be in the form of water fountains, water coolers, mains water taps labelled 'drinking water', bottled water. Additionally, the facility should evidence an assessment to monitor that the food or beverages provided are nutritious and safe. This could depend on any specific nutritional requirements from the staff. Any drinking water from the public supply should be routinely tested to ensure it is safe to drink.
Full conformance	
There shall be sources of potable drinking water, with free access to employees at any time. AND There shall be an assessment of all food or beverages provided to show they are nutritious and safe. This assessment should reflect any specific nutritional / local / dietary requirements from employees.	

5.3.5 Supplies of water, air, energy, and other utilities

5.3.5.1	Water used in, or associated with, the process shall be of potable quality.
Guidance:	For production areas where water is used in direct contact with the raw materials or products, it is essential it is of potable standard. However, water used for other purposes e.g. steam production (use in boilers), is not mandatory to be potable. Note: Some facilities use osmosis and chlorination systems to achieve the desired results which will be acceptable.
Full conformance	

There is diagnostic evidence that the water used in direct contact with the raw materials or product is classified as potable and fit for human consumption.

5.3.5.2	All additives to water shall be authorised and, by their application, shall not pose a risk to the safety of marine ingredients.
Guidance:	n/a
Full conformance	
There is documented evidence from the national authority that has the jurisdiction of this facility that any additives are safe to use	

5.3.5.3	Water dosing systems used to ensure potable quality, water softening, or anti-corrosion of equipment shall be calibrated and controlled to ensure the correct level of dosing of additives.
Guidance:	Where water is used for steam production (use in boilers), it is not mandatory to start with a potable water, but all the softening or anti-corrosion additives shall be controlled, especially if the steam produced from this treated water will be used in direct contact with the raw materials and / or marine ingredients.
Full conformance	
A full set of process and procedures is maintained by the facility to ensure that these requirements are adhered to. AND Records of these checks are available and up to date.	

5.3.5.4	Where mechanical drying of marine ingredients is undertaken, documented procedures shall ensure that it does not cause adverse effects on marine ingredient safety.
Guidance:	A documented process and procedure will be required to ensure that all the fish meal is dried in a consistent manner, this will need to be backed up by diagnostic records to prove it is accurate. A 3-drying stage process is desired to reduce the moisture content out of the fish meal in a phased manner to ensure fishmeal safety and high digestibility.
Full conformance	
There is a documented process and procedure to ensure that all the fish meal is dried in a consistent manner. AND There are diagnostic records to prove the drying is accurate.	

5.3.5.5	Where air is used for conveying or cooling, the facility shall evaluate the risk of this becoming a contamination route for pathogens and take any necessary precautions.

Guidance:	A full risk assessment of such risks should be conducted, and systems be put in place to mitigate any identified risk. A further control measure to deduce the effectiveness of these mitigation systems will be to conduct a series of environmental tests to clarify if there is any pathogenic risk within the operation.
Full conformance	
There is a risk assessment conducted and systems in place to mitigate any identified risk related to the air used. AND Environmental tests are performed to clarify if there is any pathogenic risk within the operation. AND The facility has evidence that the air used is suitable for conveying or cooling.	

5.3.6 Pest control, waste and sewage disposal and supporting services

5.3.6.1	An effective and continuous documented programme for the control of pests (including rats, insects, birds, pets, and other animals) in areas where raw materials and marine ingredients are processed, stored and/or transported, which has an emphasis upon pest proofing and pest deterrence, shall be maintained.
Guidance:	A documented policy on how to deter and control pest activity must be in place. A site plan with all the bait stations and other pest control devices must be available and date record sheets to show what poisons are used and processes on how these chemicals should be stored, used, and handled must be available.
Full conformance 0	
There is a documented policy and procedure for pest control, which includes a site plan and all pest control stations/measures.	

5.3.6.2	The facility shall either contract the services of a regulated pest control organisation or shall have trained employees for the regular inspection and treatment of its premises to deter and eradicate infestation, ensuring legal requirements are being followed.
Guidance:	The pest control company must be licenced as being competent by the national authority that has jurisdiction over this factory If conducted in house by the facility the personnel in charge of pest control must have attended and passed a professional qualification on how to control pest activity.

Full conformance
There is evidence of a licensed pest control company in place to manage pests. OR If conducted in house by the facility, there is evidence of competence for the personnel in charge of pest control i.e. they must have attended and passed a professional qualification on how to control pest activity

5.3.6.3	All waste materials shall be stored in dedicated containers held in separate areas, to prevent contamination of marine ingredients and pest infestation.
Guidance:	The containers used for waste must be in a structural good condition and fitted with tightly fitting lids to aid cleaning and to deter pest activity. The waste storage containers must not be stored with the marine ingredients but should be placed in a designated area away from all marine ingredients. All waste must be removed by a company that is licenced by the regulatory authority that has jurisdiction over the facility.
Full conformance	
The dedicated containers used for waste are in a structural good condition and in separate areas. AND The waste is removed by a company that is licenced by the regulatory authority that has jurisdiction over the facility	

5.3.6.4	There shall be adequate internal drainage to maintain a clean work area and minimise health and safety risks.
Guidance:	n/a
Full conformance	
In the raw material, processing, marine ingredients storage and waste storage area, there must be adequate drainage to remove any risk of slippages, to avoid source of contamination, and to enable the area to be cleaned correctly.	

5.3.6.5	Facility sewerage shall be contained by a separate closed system from that of the processing drainage system.
Guidance:	The sewage system must not be connected directly to the drainage system used within the production areas of the facility. This sewage system must be checked by the facility to ensure that this complete separation is maintained. This can be checked by auditors for example by questioning maintenance personnel, or the person responsible for the plant layout.
Full conformance	

The sewage system must not be connected directly to the drainage system used within the processing areas of the facility. This sewage system must be checked by the facility to ensure that this complete separation is maintained.

5.3.6.6	There shall be a preventative maintenance programme in place for the facility.
Guidance:	The facility must have a comprehensive maintenance programme in place that is designed to be proactive rather than reactive. For example, there should be processes in place that will strip down and check the repair of all parts of the facility on an annual basis to ensure that it functions correctly and is still in a good state of repair
Full conformance	
There is evidence of the proactive maintenance programme.	

5.3.6.7	All lubricants and oils shall be stored in a designated non-production or non-product storage area to prevent the risk of contamination of marine ingredients.
Guidance:	Special attention should be paid to those lubricants, oils and greases that are not food grade, to avoid direct contact of these products with raw materials, products in process and marine ingredients. Once opened and used in the production area these items should be placed and identified in a sealed container in designated areas that will not pose a contamination risk to the marine ingredients.
Full conformance	
All these chemicals are stored in designated areas away from the production or storage marine ingredients facilities.	

5.3.6.8	All inspection, measuring and test equipment used to confirm that raw, in-process and marine ingredients meet specified marine ingredient safety requirements, shall be calibrated, and recorded at intervals not exceeding 12 months.
Guidance:	In cases where measuring and test equipment are replaced periodically, the new equipment with a factory calibration certificate does not need to be calibrated if it is still within the period the calibration is relevant. Only verification should be performed to assure validate readings.
Full conformance	
All inspection, measuring and test equipment, e.g. thermometers, manometers, etc., shall be calibrated and recorded at intervals not exceeding 12 months. The calibration could be done by an external company with specific certificates per individual piece of equipment.	

5.3.6.9	Dosing rates for processing aids, additives and antioxidants shall be checked, calibrated, and controlled.
Guidance:	National competent authorities shall approve processing aids, additives, and antioxidants. The dosing levels should be checked and recorded. Staff training records should also be reviewed to ensure they understand the process and the parameters to follow to show competence.

Full conformance
There is evidence that processing aids, additives and antioxidants are approved for use by national competent authorities. AND The dosing levels should be checked and recorded. AND Staff training is undertaken to ensure they understand the process and the parameters to follow to show competence.

5.3.7 Prevention of cross-contamination

5.3.7	Access to processing facilities and storage areas shall be organised to prevent chemical, physical or biological cross contamination of marine ingredients from personnel operating in raw material and semi / fully processing areas.
Guidance:	The facility shall have a logical process flow to ensure that there are no points OF cross over that may allow the semi and marine ingredients to be cross contaminated by the raw intake material. The facility must have strict movement requirements of personal to ensure that they do not cross contaminate the semi and finished marine ingredients with the raw material. This applies to external personnel (inspectors, auditors), subcontractors and visitors.
Full conformance	
The facility has a logical process flow to ensure no cross contamination. AND The facility must ensure personnel do not cross contaminate the semi and finished marine ingredients with raw material.	

5.3.8 Cleaning and disinfecting (all areas)

5.3.8.1	There shall be thorough cleaning of all equipment and facilities to prevent contamination from pathogens, pests, dirt, and foreign materials.
Guidance:	A full set of processes and procedures must be in place for all parts of the facility to ensure that the cleaning is effective.
Full conformance	
There are processes and procedures in place to cover effective cleaning in all parts of the facility.	

5.3.8.2	Cleaning and disinfectant products shall be properly diluted, applied and securely stored so as not to pose a risk to staff and to the contamination of marine ingredients.
Guidance:	The facility must have conducted some form of risk assessment to ensure that the cleaning processes do not pose a safety risk to the product and to the staff. Staff must be trained to ensure that understand how to use the chemicals safely.
Full conformance	
There are records to ensure cleaning processes do not pose a safety risk to the product and to employees. AND Staff must be trained to ensure they understand how to use the chemicals safely.	

5.3.8.3	The cleaning and disinfecting programme shall be documented, monitored, and verified for each major item of equipment and processing area (i.e. reception, pumping, raw material storage, processing, storage, bagging, loading and dispatch).
Guidance:	A full set of records must be present to show that the cleaning processors are conducted for all major items of equipment to be in alignment with the facility's cleaning procedures. The records must be checked to ensure that they have been completed accurately and in alignment with the facility's cleaning procedures. The facility shall evidence how monitoring and verification of the cleaning and disinfecting programme has been done.
Full conformance	
There are records covering the cleaning procedure which cover all areas of the facility. AND The records must be completed accurately and in alignment with the facility's cleaning procedures. AND The facility has evidence of how monitoring and verification of the cleaning and disinfecting programme has been done.	

5.3.8.4	Environmental analysis for relevant microorganisms shall be carried out in storage areas according to the HACCP based risk assessment.
Guidance:	The HACCP risk assessment will identify if storage areas are at risk of causing contamination of marine ingredients. For example, if there are open storage areas, or the entry of sources of contamination are not managed. Relevant indicators of contamination should be used, including which microorganisms are important to monitor. For example, salmonella is an indicator of food safety including marine ingredients, and it should not be present in storage areas or marine ingredients.
Full conformance	

If the HACCP risk assessment identifies a risk of contamination in the storage areas, environmental analysis is conducted according to a sampling plan.

5.3.9 Personnel hygiene

5.3.9.1	Protective personal clothing shall be worn where the facility has determined that there is a risk to personnel health and safety and to marine ingredients contamination.
Guidance:	A risk assessment should identify where personal protective clothing is required and what items are required in parts of the facility. This includes external personnel (inspectors, auditors), subcontractors and visitors.
Full conformance	
All relevant personnel are issued with appropriate protective clothing. AND There is a risk assessment covering requirements for protective clothing.	

5.3.9.2	Personnel employed to work in direct contact with marine ingredients shall meet national medical checks, if applicable, before being recruited.
Guidance:	Personnel that will work in direct contact with marine ingredients are identified and have passed medical checks as part the recruitment process, where this is deemed a requirement by national regulations.
Full conformance	
There is evidence that relevant personnel have passed all necessary medical checks.	

5.3.9.3	During operation of the facility, personnel shall, if applicable, be subject to routine medical examinations with defined intervals that meet national legal requirements.
Guidance:	The facility shall evidence that personnel have good health status showing the results of routine medical examinations with defined intervals. The list of analysis / tests should meet national legal requirements or be related to the HACCP risk assessment for pathogens such as salmonella.
Full conformance	
There is evidence that personnel have routine medical examinations with defined intervals, as applicable. AND The list of analysis / tests meets national legal requirements or are related to the HACCP risk assessment.	

5.3.9.4	Where applicable in national legislation, personnel shall report conditions (jaundice, fever, vomiting, sore throat, visibly infected skin lesions and discharge from the eyes, ears, or nose), to manage an exclusion from marine ingredients processing or handling areas.
Guidance:	n/a
Full conformance	
There are procedures to demonstrate how personnel report illness/conditions that can affect the marine ingredients and staff.	

5.3.9.5	Production area personnel shall wash and sanitise their hands before entering production areas, immediately after using bathrooms, and after handling potentially contaminated products.
Guidance:	The facility has procedures and instructions in place to explain how and when the personnel should wash and sanitize their hands. Good practice is to have obvious signs with pictures to facilitate the procedure application and understanding. Rules on handwashing and sanitisation shall apply to anyone entering the production areas.
Full conformance	
There are procedures and instructions in place to explain how and when the personnel should wash and sanitize their hands.	

5.3.9.6	There shall be rules for managing the conduct of all personnel relating to personal hygiene, health and safety and food safety, in processing, packaging and storage areas.
Guidance:	The facility shall have staff basic rules for hair and beard covering; the use of earrings, rings, and necklaces; drinking and eating, spitting, the use of personal protective equipment, etc. Rules on conduct of personnel should apply to any persons entering the production areas.
Full conformance	
The facility shall have a list of rules for all personnel working in processing, packaging, and storage areas.	

5.3.10 Inspection, sampling, and analysis

5.3.10.1	The facility shall have representative inspection regimes in place that ensure the safety of all raw materials on arrival and marine ingredients on dispatch.
Guidance:	The inspection regimes are normally represented in control process plans or equivalents for all raw materials, products in process and finished product, based on the nature of the operation, good manufacturing practices pre-requisites and the HACCP assessment.
Full conformance	
There are inspection regimes for all raw materials, products in process and marine ingredients which are based on the nature of the operation, good manufacturing practices pre-requisites and the HACCP assessment.	

5.3.10.2	Inspections shall include, as appropriate, assessment of: • physical form • odour • contamination by insect pests, droppings, and other extraneous matter • mould • compliance with specification
Guidance:	The inspection shall include, where applicable, size, weight, colour, odour, visual inspection for pests or extraneous matter like plastics, metal, glass, etc. Additionally, inspection to evidence compliance with specification shall consider but not limited to protein, ash, fat, moisture, total volatile nitrogen (TVN), histamine, free fatty acids, salt, sand, etc.
Full conformance	
The inspection regime shall cover all the stipulated requirements of this clause.	

5.3.10.3	Samples of the finished materials shall be labelled to facilitate traceability and be retained in appropriate conditions for a minimum period of six months.
Guidance:	The facility can determine the total length of time to retain samples of marine ingredients, but a minimum of six months is required to cover the time from date of dispatch until use by the final customer. Samples of all marine ingredients must be retained. As a minimum, it is essential to take samples at the point of dispatch as this covers what the customer receives. Ideally samples of marine ingredients taken just after production and at point of dispatch are retained to cover all situations, but this is the decision of the facility. If the shelf life of the product is longer than six months, the retention of samples over the shelf life of the products should also be considered.

	Acceptable storage conditions include that the sample containers are sealed, tamper resistant and stored in indirect light, protected from sources of moisture. Label should not be removable or modified.
Full conformance	
Labelled sample of marine ingredients are available and retained for 6 months.	

5.3.10.4	Facilities shall undertake sampling and analysis of marine ingredients to meet the statutory standards for the permitted concentration of an additive such as antioxidants.
Guidance:	The sampling and analysis of additives shall be performed by lot or batch basis, assuring the adequate concentration aligns with statutory standards and / or regulatory requirements.
Full conformance	
There are records of sampling and analysis of additives, aligned to the sampling plan.	

5.3.10.5	The sampling and testing plan shall be based on a HACCP based risk assessment for undesirable substances, aligned with national and international requirements.
Guidance:	Each country has their own requirements and limits for undesirable substances. The facility shall be aware of these differences and have to plan how to comply with all the markets / countries where the marine ingredients will be despatched.
Full conformance	
There is a sampling and testing plan for undesirable substances, e.g., heavy metals, dioxins and PCBs, pesticides, etc. AND The quantity and frequency of the testing shall be supervised by the national authority and shall comply with the sanitary requirements of the country of destination.	

5.4 Hazard Analysis Critical Control Point (HACCP)

5.4	Facilities shall establish and maintain an effective Hazard Analysis Critical Control Points system (HACCP) specific to their own premises and appropriate to the nature and volume of the production of all marine ingredients. · Separate HACCP systems shall be available for food / feed. · All existing and new products shall be covered by the HACCP system, which shall be regularly reviewed, at least annually.

Guidance:	Formal procedures that control potential hazards on a site-wide basis, such as: pest control, cleaning, training, raw material, and marine ingredient specifications, etc., commonly referred to as prerequisites shall be in place prior to the establishment of the HACCP plan. If the regulatory authority allows to have both types of marine ingredients (food and feed) in the same manual, then the need for separate HACCP is not required.
Full conformance	
Facilities must be able to demonstrate they have a specific HACCP plan covering all the marine ingredients produced for feed and/or food (for human consumption). AND There are regular reviews of the HACCP system.	

5.4.1 Hazard control

5.4.1.1	Documented information regarding characteristics shall be maintained, as applicable, such as: chemical, physical, and biological characteristics, composition, origin, place of origin, labelling, production method, packaging, storage conditions, distribution, delivery, shelf life and acceptance criteria for purchase for marine ingredients produced, raw materials, ingredients (including additives) and materials in contact with the marine ingredients.
Guidance:	n/a
Full conformance	
There is documented information (data sheet, Material Safety Data Sheet (MSDS) regarding the main characteristics for: - marine ingredients, - raw materials, - ingredients (including additives such as preservatives, antioxidants, and processing aids) and - materials in contact with the marine ingredients (lubricants, oil, and greases).	

5.4.1.2	For marine ingredients sold in bulk as well as in bags, delivery documents / labels shall include any details (such as statutory statements) required under labelling regulations in the country of production and / or receipt.

Guidance:	The delivery documents and the labels shall indicate if the marine ingredient is MarinTrust certified, MarinTrust Improver Programme accepted. If the marine ingredient is not MarinTrust or Improver Programme accepted, no MarinTrust logo nor Improver Programme claim can be used.
Full conformance	
The information in the delivery documents / labels shall include but not limited to: · The name of the production site · The company name · The net weight · The product name · The product lot / batch number (identification) · The product characteristics (e.g., min Protein content, max fat, ash, moisture, free fatty acids (FFA), eicosapentaenoic acid (EPA), docosahexaenoic acid (DHS))	

5.4.1.3	Each marine ingredient product shall have a written specification that is made available to purchasers and potential purchasers of the marine ingredients offered by the facility.
Guidance:	All marine ingredients produced by the facility has their own written specification and there is evidence that is available to the customers and potential purchasers. These specifications shall include physical and chemical characteristics that will depend on the nature of the marine ingredient and / or the sanitary regulations.
Full conformance	
There are specifications for all marine ingredients produced by the facility, and these are made available to customers and potential purchasers. The specifications include physical and chemical characteristics relevant to the marine ingredient and / or the sanitary regulations.	

5.4.1.4	The specification shall confirm whether the marine ingredient is an approved MarinTrust material.
Guidance:	The specification shall include a declaration of the content of certified marine ingredients and any content that is non-certified MarinTrust. If the facility produces marine ingredients from sources which are non-certified MarinTrust or not from an Improver Programme, the specifications should not have the MarinTrust logo (or claim in the case of Improver Programme) for these products.
Full conformance	
The marine ingredients specification shall include the MarinTrust logo, or there is a written communication confirming that the marine ingredients are supplied under the MarinTrust standard.	

5.4.1.5	The intended use of marine ingredients shall be considered and maintained as documented information.
Guidance:	The documented information shall describe the intended use of the marine ingredients produced by the facility, e.g. marine ingredients for food or feed purpose in the product specifications, data sheets or equivalents. Also, can be documented as part of the HACCP analysis.
Full conformance	
There is documented information describing the intended use of the marine ingredients.	

5.4.1.6	The HACCP analysis shall have a documented flow chart to ensure all parts of the marine ingredient production process are assessed and accounted for.
Guidance:	This flow chart can be divided by different lines regarding different marine ingredients. Also, there can be only one flow chart when common steps are described for different marine ingredients.
Full conformance	
The facility has a detailed and documented flow chart identifying all the steps of the marine ingredients production process to ensure a proper HACCP analysis.	

5.4.1.7	The HACCP flow chart shall be reviewed in situ to ensure that it is an accurate representation of the facility's production process.
Guidance:	There is evidence such as minutes, records of the HACCP in-situ review, and any adjustments made in the flow chart if differences were detected during the in-situ review.
Full conformance	
There is documented evidence that the flow chart is a real and up to date representation of the production process	

5.4.1.8	To perform the hazard analysis, the HACCP team shall describe the following: · facilities distribution · process equipment · process parameters · procedures · external requisites
Guidance:	In order to perform an adequate Hazard Analysis, the HACCP team shall have evidence how they describe the information related to the operation, in order to have a complete overview of the facility's distribution, main process equipment, process parameters like temperatures, pressures, flow rates and the production procedures and external requisites that can affect the marine ingredients safety.
Full conformance	

The HACCP team has evidence to show how the hazard analysis covers all the facility's distribution, main process equipment, process parameters (e.g. temperatures, pressures, flow rates) and the production procedures and external requisites that can affect marine ingredient safety.

5.4.2 Hazard analysis

5.4.2	The HACCP team shall perform a hazard analysis based on the preliminary information to determine which hazards needs to be controlled. The control level shall assure marine ingredient safety and, when appropriate, a combination of control measures shall be used.
Guidance:	n/a
Full conformance	
The preliminary information from hazard control (5.4.1 and sub clauses) has been considered to perform the hazard analysis. AND There is evidence that this information has been used to determine the control measures.	

5.4.3 Hazard identification

5.4.3.1	The HACCP team shall identify all the hazards related to the marine ingredients that are expected, related to the nature of the product, the process, the environment, and its intended use.
Guidance:	All hazards must be included. For example, it is not sufficient to identify presence of heavy metals as a hazard, because there are different heavy metals (e.g. cadmium, lead, mercury, arsenic) with different behaviour regarding the potential presence and persistence in the marine ingredients.
Full conformance	
The HACCP Team can evidence that they have identified hazards related to the marine ingredients and its intended use, process, additives, and environment. AND This identification shall be detailed enough to assure that all the hazards have been identified.	

5.4.3.2	The identification shall be performed based on:

	· preliminary information · experience · internal and external information, including epidemiological, scientific, and historical background · information from the marine ingredient chain (from raw materials until end products) · legal, regulatory and customer requirement
Guidance:	The hazard identification shall be performed using all the preliminary information, experience, background, scientific, historical, and epidemiological information, etc., to identify specific hazards than can affect the marine ingredients. Documentary evidence of this identification process shall be available.
Full conformance	
Documentary evidence of this identification process shall be available.	

5.4.3.3	The facility shall indicate the step(s) at which each marine ingredients safety hazard can be present, be introduced, increase, or persist, considering the stages before and after the marine ingredients supply chain, all the steps in the flow diagram and the process equipment, facilities / utilities, environment, and personnel.
Guidance:	n/a
Full conformance	
All steps of the production process have been analysed related to hazards that can be present, be introduced, increase, or persist, aligned with the flow chart, and related to the equipment, facilities/utilities, environment, and personnel.	

5.4.4 Risk assessment

5.4.4	The HACCP plan shall be based on an assessment of risk and shall identify which hazards are of such a nature that their elimination or reduction to acceptable levels is essential to the safe production of marine ingredients. In conducting the hazard analysis, the following should be taken into consideration: • the likely occurrence of hazards and severity of their adverse health effects on consumer • the determination of safety parameters for each identified hazard and this shall be documented • the qualitative and/or quantitative evaluation of the presence of hazard • survival and multiplication of micro-organisms of concern

	• conditions leading to the above
Guidance:	n/a
Full conformance	
The hazard identification shall be performed using all the preliminary information, experience, background, scientific, historical, and epidemiological information, etc., to identify specific hazards than can affect the marine ingredients. AND Documentary evidence of this identification process shall be available.	

5.4.5 Establishing Critical Control Points (CCPs)

5.4.5.1	The facility shall determine and set control measures specific to the facility based on its risk assessment.
Guidance:	n/a
Full conformance	
Specific control measures regarding the process steps to avoid the presence, introduction, increase or persistence of significant hazards are determined based on the outcome of the risk assessment.	

5.4.5.2	The facility shall identify the control measure(s) that are related to CCP(s) and maintain a documented record as to why this determination was made.
Guidance:	There are different tools to help CCPs determination. The most used tool is the HACCP CCP decision tree.
Full conformance	
There are identified CCPs that are the last step where the hazard can be controlled. AND The process to define these CCPs is documented.	

5.4.6 CCP control / HACCP Plan

5.4.6	The facility shall establish, implement, and maintain a documented hazard control plan, including: • hazards related to marine ingredients safety to be controlled by CCP or operational prerequisites programme (clause 5.3) • critical limits, follow-up procedures, corrections, responsibilities, and records
Guidance:	n/a
Full conformance	
The documented HACCP plan is well established, complete implemented and updated / maintained.	

5.4.7 Determine marine ingredients safety limits for CCPs

5.4.7	The facility shall determine for each CCP which parameters shall be measured, analysed, or observed, and which marine ingredient safety limits apply for these parameters.
Guidance:	The most common CCP is the drying step, where time and temperature parameters are measured, analysed, or observed. The safety limit for example is more than 75°C for at least 20 minutes.
Full conformance	
For each CCP defined by the facility, specific parameters and their correspondent safety limits are determined.	

5.4.8 Monitoring CCPs (Critical Control Points)

5.4.8.1	A monitoring plan for each CCP shall be set up for each control measure, or combination of control measure(s), to detect any non-compliance within the marine ingredient's safety limits. The system shall include all scheduled measurements relative to the marine ingredients safety limits.
Guidance:	n/a

Full conformance	
There is a documented monitoring plan for each CCP.	

5.4.8.2	The monitoring plan shall be documented including information on methods, frequency and responsibilities of sampling, calibration, and monitoring.
Guidance:	n/a
Full conformance	
The facility has implemented and documented a monitoring plan that includes methods, frequency, responsibilities of sampling, calibration, and monitoring for each CCP.	

5.4.8.3	The facility shall establish the corrective actions to be taken when monitoring indicates that a particular CCP is not under control.
Guidance:	n/a
Full conformance	
The facility has established corrective actions procedures to apply when CCPs are not under control.	

5.4.9 Validation

5.4.9.1	The facility shall validate the control measures of the prerequisites and the HACCP plan prior to its implementation and after any changes are made.
Guidance:	Validation evidence can include but is not limited to scientific information, historic data, microbiological sampling and analysing, flow rates, thermal treatment calculations, marine ingredients testing, etc.
Full conformance	
There is evidence about the validation of control measures related to good manufacturing practices prerequisites and the HACCP plan, before implementation and after a significant change in the process has been made.	

5.4.9.2	If validation shows control measures(s) are ineffective, the facility shall modify and reassess the control measure(s) and / or the combination of control measure(s). Documented validation methodologies and evidence shall be maintained.
Guidance:	If the validation shows that the HACCP plan is not effective, the facility shall also modify safety limits or other parameters.
Full conformance	
The facility can evidence it has modified and reassessed the control measure(s) and/or combination of control measure(s) after validation. AND Documented validation methodologies and evidence are well maintained.	

5.4.10 Verification

5.4.10	The HACCP Team shall carry out regular reviews (at least annually) to verify the requirements of the HACCP plan are being met in practice and that the plan effectively and consistently ensures that the facility produces safe marine ingredients.
Guidance:	n/a
Full conformance	
There is evidence such as minutes, internal audits, records to demonstrate that regular reviews have been made at least annually.	

5.5 Threat Assessment and Critical Control Points (TACCP) / Vulnerability Assessment and Critical Control Points (VACCP)

This section only applies to facilities producing marine ingredients for human consumption.

5.5.1	The facility shall produce a documented review of threats and vulnerabilities to protect the integrity of products intended for human consumption.
Guidance:	There is a documented TACCP/VACCP review for products intended for human consumption. These should cover all threats and vulnerabilities across the entire production.

Full conformance
A documented TACCP/VACCP assessment is available covering threats and vulnerabilities across the entire production.

5.5.2	This review shall be updated at least annually.
Guidance:	The documented is reviewed each year after its creation.
Full conformance	
The review has been completed in the past 12 months.	

Section 6: Staff training and competence

6.1 Training and development programme

6.1	The facility shall have a training and development programme to ensure that all employees are equipped with the necessary skills and knowledge to fulfil their role correctly and safely to meet the requirements of this Standard
Guidance:	The training and development programme covers all employees. It also includes all areas of the MarinTrust standard and identifies what training is required to fulfil each area of the Standard. Examples of what should be included are how employees are informed about responsible sourcing, social accountability, health and safety, hygiene etc.
Full conformance	
There is a documented training programme covering all employees who are critical to the successful adoption of the standard.	

6.2 Training and development procedure

6.2	The facility shall have a training and development procedure in place which includes:

	· Identification of training requirements/needs · Provision of training · Review of provision of training · Review of effectiveness of training · co-ordination of training provision · Record keeping by a designated person
Guidance:	There is a documented procedure for training for all staff including how training needs are identified and delivered. The provision of training to staff has also been documented to demonstrate that staff are competent to meet the requirements of this Standard. The facility reviews its training procedure on an annual basis to make improvements if necessary. Examples of records include human resources policies or plans, training matrices, a training handbook/guide, internal training strategy.
Full conformance	
There is a documented training procedure that includes all the requirements of this clause. AND There is a person / team responsible for coordinating training requirements and record keeping.	

6.3 Specific training requirements

6.3	Where specific training is required, especially on dangerous machinery as identified within the health and safety risk assessment, employees shall be suitably trained within a timely manner.
Guidance:	A health and safety risk assessment must be undertaken to identify control measures that shall be taken within the facility. This should include identifying training requirements for any areas associated with risk. Any employees undertaking those tasks shall be fully trained. Depending on the level of knowledge required, this training may be provided by attending a training course (internal or external), close supervision until deemed fully competent, or undertaking relevant qualifications to undertake areas of high risk.
Full conformance	
Additional training is provided before employees undertake activities where training is essential.	

6.4 Training records

6.4	Training records shall be maintained to include details of the training provided for and attended by employees.
Guidance:	Training records may be available in different formats such as online systems, paper records, or in employee files. The training records available shall be up to date, maintained for each person and include details of training available and delivered.
Full conformance	
Training records are available and include the necessary details.	

6.5 HACCP (Hazard Analysis Critical Control Points) Training

6.5.1	A HACCP team leader or nominated team representative shall have competence in the understanding of HACCP principles and their application.
Guidance:	The HACCP team leader shall have completed some formal training into the principles of HACCP and how the system should be managed and monitored. This can be through a formal training course, a professional or work-based qualification. There should be evidence of the level of competency achieved by the HACCP team leader.
Full conformance	
There is evidence that the HACCP team leader has achieved a level of competence in HACCP.	

6.5.2	Key personnel identified as HACCP team members shall have appropriate training, product and process knowledge and experience.
Guidance:	There shall be a list of HACCP team members and /areas of competence for each person. This should include an explanation of how and why members of the HACCP team were chosen and which part of the facility they cover e.g.: maintenance, engineering, feed safety/quality control, production etc. Training should be from a competent source, e.g.: HACCP trained team leader or industry recognised course.
Full conformance	
There is documented evidence that the whole HACCP team has achieved a level of competence in HACCP.	

Section 7: Social accountability and community

7.1 Self-declaration

7.1.1	The facility shall sign and display (clearly) a self-declaration assuring good social practice and human rights of all employees, including: · a commitment to ensure no child labour · a statement that no discrimination is practised · a statement that no harsh or inhumane treatment is allowed
Guidance:	The auditor should request to see the declaration during the on-site audit. This should be in a location that is visible to employees, visitors etc.
Full conformance	
A self-declaration as described is displayed and it is visible to all employees.	

7.1.2	Employees shall be informed about the self-declaration at least every 12 months.
Guidance:	The declaration must be available for all workers. Examples may be that it is included in a staff handbook, on a poster, in an induction pack, on an all-staff intranet, or as part of annual training etc. Posters should be in highly visible locations, such as the entrance for employees, staff canteens etc.
Full conformance	
The facility can demonstrate that all employees have been reminded of the self-declaration within the past 12 months. OR All employees have ready/constant access to the self-declaration.	

7.2 Documented self-assessment

7.2	The facility shall conduct a documented annual self-assessment against all relevant employment and worker welfare laws and include all nonconformities and action plans to address and monitor the nonconformities.

Guidance:	Auditors should request to see copies of documentation summarising the self-assessment process and the outcomes. This should include an overview of all areas of employment and worker welfare laws. A gap analysis should identify any areas that are missing or that require updating. The facility should document follow-up actions to address any gaps/actions taken to resolve issues. Ideally the self-assessment and its findings should be communicated to worker representatives and/or employees.
Full conformance	
There is documented evidence that an internal assessment has been conducted in the 12 months preceding the audit. AND The assessment includes any issues /gaps, and actions identified to close those gaps.	

7.3 Knowledge of responsible person

7.3	The facility shall demonstrate that the responsible person for workers' health and safety and the employees' representative(s) have knowledge and/or access to national regulations concerning gross and minimum wages, working hours, union membership, anti-discrimination, child labour, labour contracts, holidays, maternity and paternity leave, medical care, and pension/gratuity.
Guidance:	The facility should be able to provide details of the credentials of the responsible person(s), including any training or qualifications that person has. The responsible person and the employee representative shall have completed formal training relating to employment requirements and worker welfare responsibilities. This can be through a formal training course, a professional or work-based qualification. There should be evidence of the level of competency achieved by both.
Full conformance	
The facility has a person(s) with responsibility for these matters. OR The facility has access to third-party expertise. AND Records of the credentials and/or any training this responsible person has received are available.	

7.4 Policies and procedures

7.4.1	The facility shall have a documented discrimination procedure to demonstrate that no discrimination based on race, colour, sex, religion, political opinion, national extraction, or social origin takes place.
Guidance:	The auditor should review the discrimination procedure to ensure that it covers these protected characteristics as a minimum. Records of discrimination complaints received should also be included, including resolutions to those (note these may be covered in records of grievances). MarinTrust is aligned with the requirements of the ILO (International Labour Organization) definition of discrimination and facilities should check the latest ILO requirements to ensure best practice. An auditor can choose to ask workers if they are aware of this procedure as part of the facility inspection.
Full conformance	
There is a discrimination procedure in place, and it covers all the protected characteristics listed as a minimum. NOTE: The facility may receive this full conformity rating if there is a procedure in place, but no issues have been recorded in the last 2 years.	

7.4.2	The facility shall have a documented grievance procedure, which: · details the timeframe within which grievances shall be resolved · protects the person(s) who raised the grievance from recrimination
Guidance:	The auditor should review the grievance procedure along with any records of grievances reported and resolutions to those grievances. The auditor should check that the resolution of grievances is in line with the procedure and how the grievance complaints have been managed.
Full conformance	
There is a grievance procedure in place with defined resolution timescales AND there are safeguarding measures for employees who raise a grievance.	

7.4.3	The facility shall have a documented recruitment procedure for hiring all employees, whether they are employed directly or through agencies, that includes: • recruitment agencies for temporary / seasonal / migrant workers shall be licensed / registered / regulated, or have been assessed through the facility's due diligence checks

	• no worker pays recruitment fees
Guidance:	The facility should have evidence of its recruitment procedure and how this is dealt with. There should be records of any means of recruitment, including details of how roles are advertised, which agencies may be used and how they have been vetted. There should be evidence on payment of fees that shows details for temporary workers, permanent workers and agency staff where used. The definition of agency workers and recruitment fees is included in the MarinTrust 'Definition of terms'., This distinguishes the differences between temporary workers and agency staff. Agency staff are employed and paid by a third-party work agency and may have specific costs deducted. This is different from recruitment fees, which are associated with recruitment agencies sourcing workers who will be employed directly by the facility.
Full conformance	
There is a recruitment procedure in place that covers all types of employees. This procedure includes details on how service providers are checked, and that the facility demonstrates that no worker employed by the facility pays fees.	

7.5 Health, safety, and welfare

7.5.1	A documented Health and Safety risk assessment, in line with legislation in the country in which the facility is based, shall have been conducted and implemented (including control measures) to protect all users of the facility.
Guidance:	Auditors should request the H&S risk assessment report, including outcomes and mitigating measures implemented as a result. Implementation of mitigating measures should be confirmed during the on-site audit.
Full conformance	
A full health and safety risk assessment has been conducted and implemented.	

7.5.2	The facility shall provide all workers with the necessary equipment for worker safety, as stipulated in the risk assessment, at no cost to the workers.
Guidance:	The health and safety risk assessment should reduce all risks. Where these risks cannot be eliminated, personal protective equipment (PPE) will be necessary. It is essential that all the PPE as stipulated in the health and safety risk assessment is freely available for all employees that require it. The facility has a system for the provision of protective equipment for all workers as applicable including correct use, care, cleaning, and maintenance as applicable. Replacements shall be available.

Full conformance
There is a PPE policy and procedure stipulating the requirements of this clause. AND Personal protective equipment is worn by all individuals in activities/areas, where it is deemed a requirement.

7.5.3	The facility shall have an implemented procedure for documenting any health and safety related incidents/accidents and corrective actions, including reporting to authorities as required by local regulations.
Guidance:	This should include minimum requirements such as accident recording, how to record health and safety related accidents and incidents, and the associated corrective actions that have been implemented.
Full conformance	
A procedure is available to detail the steps to be taken in the event of incidents and accidents.	

7.5.4	First aid and healthcare shall be provided in line with legislation in the country in which the facility is based. In countries with no legal stipulations for first aid / healthcare, the following shall apply: · the facility shall have trained first aiders and first aid cover is in place for each operational shift · a first aid kit shall be available, with contents in date and appropriate for level of first aid risk · records shall be maintained of use of content for first aid kit
Guidance:	The facility shall have first aid / healthcare provision for employees during the production hours. At a minimum this should include trained first aiders commensurate with the size of the facility and the shift patterns. Equipment should be available for the provision of first aid on site including a first aid kit that is monitored to ensure it remains fit for purpose i.e. in terms of type of content, expiry dates, items being replaced. Records must be maintained for any items removed from the first aid kit, including for what purpose it was removed. The auditor should view the records as well as the first aid kit. In facilities where these are monitored by an external regulator/agency, a copy of the inspection report can be an alternative, provided it is within 12 months preceding the audit.
Full conformance	
First aid provision fully meets the legal or minimum stated requirements and are appropriate to the size of the facility.	

7.5.5	If accommodation is provided to employees by the facility, it shall be:

	· maintained in good structural condition · not create a health or safety risk to the employees (including decent sanitary conditions, suitable light, ventilation, temperature, separation of genders)
Guidance:	The auditor shall verify if accommodation is provided and on what basis it is provided. The facility shall be expected to have inspection reports from a regulatory authority or third party / independent inspection for the accommodation to ensure it is fit for purpose. The auditor can assess whether any grievances have been raised about the accommodation and how these have been resolved. Where there are no independent inspection reports, the auditor can request to inspect the accommodation. If no inspection report is available and the auditor is unable to inspect the accommodation, the facility may provide video evidence of the accommodation, but this shall be streamed live during the period of the on-site audit of the facility so the auditor can see it in real-time. Any such video evidence must be taken whilst protecting the rights and privacy of users of the accommodation. This clause is N/A for any facilities that do not provide any accommodation for employees.
Full conformance	
Accommodation fully meets the minimum stated requirements.	

7.5.6	If food is provided to employees by the facility, the facility shall ensure it meets the dietary needs / intake of the employees.
Guidance:	The auditor shall verify if food (meals) is provided and on what basis it is provided i.e. free or paid for. The facility shall provide evidence of food/meals it provides, i.e. hot, cold, made in-house, independent catering provider, typical menu choices. The facility should be able to provide details of any specific dietary needs that it caters for, and whether there have been complaints about meals, and how these have been resolved. This clause is N/A for any facilities that do not provide any food/meals for employees, or that only provide vending machines for snacks.
Full conformance	
Food (meals) fully meet the minimum stated requirements. AND There is evidence of how the facility ensures the suitability of food for its employees. Evidence can include, for example, meal assessment plans, alignment with national guidelines, seeking staff feedback etc.	

7.6 Employment agreements

7.6.1	The facility shall ensure that all staff have the correct visa / work permit to comply with its current national employment regulations.
Guidance:	All staff should have the correct visa/work permit to comply with current national employment regulations. The facility shall be able to show records for how they check and verify the visa/work permit of each employee before they start their employment.
Full conformance	
There should be accurate and up-to-date records for all staff. AND All employees are legally entitled to work in the country the facility is based.	

7.6.2	All workers shall be provided with work agreements / contracts that they understand and that comply with one of the following points: The work agreement/contract is compliant with national legislation that stipulates the content of the contract / agreement. OR Where there are no national legal requirements, work agreements / contracts shall include the following as a minimum: · a description of the role and any responsibilities · the type of contract · working hours and rest periods · paid / unpaid time off · wages (including levels and frequency of pay, agreed deductions and overtime) · benefits · termination terms and conditions, including notice period · access to relevant employment policies
Guidance:	All workers are required to have a contract specific to them and their role. The auditor will ask to see a blank example to ensure that the contract covers the requirements. The auditor is expected to see a representative number of completed contracts, selected at random.
Full conformance	
All workers have equivalent terms and conditions. AND Contracts are available for every member of staff, in a format understandable for each worker. AND The content of the contract fully aligns with legal requirements in the country in which the facility is based. OR	

The contract includes all the stated requirements.

7.6.3	The employment contract or work agreement shall be signed and dated by both the facility (authorised representative) and employee.
Guidance:	The auditor will check the copies of completed contracts, selected at random, to ensure they are signed by both parties.
Full conformance	
Signed contracts available for all employees	

7.6.4	Employee records shall contain as a minimum: · full names · nationality · a job description · date of birth · the regular working times · wage · the start date of employment
Guidance:	All these criteria are required to be available for all employees. The auditor will check a random selection of employee records to confirm the information is available.
Full conformance	
Records with all the criteria are available	

7.7 Working hours, pay and remuneration

7.7.1	A log / record of each worker's working hours and rest periods shall be maintained.
Guidance:	Workers are typically employed based on the number of hours worked. These can be set hours each week, or may vary depending on overtime etc. It is essential that records of hours worked, and rest periods are kept ensuring workers are paid in line with their work agreement/contract, are not working too many hours and are able to take sufficient rest breaks.

	The hours of work and rest periods may be defined in national regulations or through local agreements. Workers should be able to voluntarily choose to work additional hours, beyond the normal contracted hours, so long as records are kept of those hours and that those additional hours do not adversely affect their welfare, health, or safety. The auditor should be able to see records of work and rest for employees. They should request to see the 'time keeping system' and how these records are kept/managed. If applicable, the auditor can request a random sample of employee records.
Full conformance	
Records showing full working hours and rest periods are available for every employee.	

7.7.2	There shall be records to demonstrate that each employee has been paid for the work they have completed, including any approved overtime.
Guidance:	Auditors should request to see payment records dating back in time to ensure records are being retained. This links to Clause 7.7.1 as the hours worked will normally dictate the levels of pay.
Full conformance	
There are records to demonstrate that employees are paid accurately i.e. for the time worked at the correct pay levels	

7.7.3	Records of regular payment of all employees shall be retained for at least three years (from start date of employment if this is less than three years).
Guidance:	Applies to employees of the facility. Auditors should request to see payment records such as pay spreadsheets and payslips.
Full conformance	
Records are retained for the period of time defined.	

7.7.4	Employees, including those paid per unit, shall be paid at least national legal minimum wage within a regular normal working week, excluding overtime.
Guidance:	Employees are paid at least the minimum wage in the country the facility is based. IF minimum wage is not applicable, the facility must be able to provide evidence of how pay is calculated. Note: regular hours are stipulated in the work agreement / contract. Rates of pay should be evident from the work agreement/contract and/or from the evidence of pay. Normal work hours means when the plant is in production, based on average across the defined time period. Excludes out of season periods, low production times, overtime etc.

Full conformance
There are records to demonstrate that employees are paid at least the national legal minimum wage for their regular hours.

7.7.5	Deductions shall not be permitted with the exceptions of statutory requirements or deductions agreed with the employee as part of the contract / work agreement.
Guidance:	Deductions should be made clear to all employees in their work agreement/contract and as part of the regular evidence of payments. Any itemised deductions shall be clearly defined as to their purpose and amount.
Full conformance	
There are records to demonstrate that any deductions are fully agreed between the facility and the employees.	

7.7.6	There shall be documented information including: ·advances · hours worked · pay ·calculation of deductions (if applicable)
Guidance:	All these criteria are required to be available for all employees. The auditor will check a random selection of employee records to confirm the information is available and fully documented.
Full conformance	
Records with all the criteria are available for all employees.	

7.8 Employment age

7.8.1	The facility shall show records indicating compliance with national legislation regarding the minimum age of employment.
Guidance:	Employees are at or above the minimum working age in the country the facility is based. Date of birth is stipulated in clause 7.6.4. The facility should have procedures for how it verifies the date of birth for every employee. There may be a general policy/rule about the minimum accepted age of workers, for example, in the facility's own policies etc.
Full conformance	

No worker is below the legal minimum age of employment in the country the facility is based. AND Records show age is verified for all employees. AND The sample shows no issues with age.

7.8.2	If the minimum age of employment is not covered by national legislation, one of the following points shall apply: • The facility may employ young workers as of the age of 15 or above the age of completion of compulsory education (whichever is higher), to conduct non- hazardous work with written permission from the child's parent / legal guardian. OR • The facility may employ young workers as of the age of 15 through an official / licensed / regulated apprenticeship scheme.
Guidance:	Where it is legal to employ young people, i.e. under the age of 18, the auditor is expected to see records showing that the facility complies with ALL requirements of this clause. The auditor will request details of any young workers and verify that the necessary requirements are in place. It is essential that a facility can show how many young workers it employs and the work those young workers are involved in. Non-hazardous work may be defined in national law and may include examples where the employment of young workers is prohibited. Non-hazardous must not harm the health, safety, or morals of children (under 18-year-old).
Full conformance	
Any young workers (under the age of 18) are only undertaking non-hazardous jobs. AND There are records to show that the young worker has parental/guardian permission. OR There are records to show the young worker is engaged on a formal scheme.	

7.8.3	All young workers (15 and upwards) shall be protected from risks and hazards specific to their age and in line with those activities identified within a young person's health and safety risk assessment.
Guidance:	Additional risk assessments must be conducted for any employees under the age of 18. This should cover the age of workers, the work they are employed to do and how any identified risks are managed / eliminated.

	Note: facilities should refer to guidance from the ILO regarding employment and suitable work for young workers (aged 15-18). Non-hazardous work may be defined in national law and may include examples where the employment of young workers is prohibited. Non-hazardous work must not harm the health, safety, or morals of young workers (under 18-year-old).
Full conformance	
A young worker's (aged 15-18) health and safety risk assessment is available. AND No young workers are employed in hazardous work.	

7.9 Freedom of association, collective bargaining, and worker representation

7.9.1	The facility shall allow freely chosen worker representation for all employees.
Guidance:	The principle of freedom of association is essential for effective and fair workplaces and is one of the ILO's fundamental labour rights. Facilities shall permit workers to organise and form employers' and workers' organisations, without any interference. Representation may be provided by organisations of the employees' own choosing. representation can take different forms either formally or informally. Examples include employee groups or committees, or nationally recognised worker representative organisations. Ref: ILO. A facility shall be able to show that it does not impede any worker representation. There are ways that a workplace can demonstrate this. For example, there may be a written statement demonstrating worker representation in the workplace included within work agreements/contracts, or in an employee handbook. New employees may be informed about the provisions of worker representation as part of their induction etc. There can be information provided on posters / noticeboards etc.
Full conformance	
The facility can provide evidence that it allows freely chosen workplace representation.	

7.9.2	The facility shall have documentation which demonstrates that a clearly identified, named employees' representative and / or a workers committee representing the interests of the employees to the management is elected, or appointed, or nominated by all employees, and recognised by the management.
Guidance:	Worker representation is typically undertaken by a worker elected by fellow employees. There may be a single worker representative or a representative group i.e. a workers' committee.

	The selection of worker representatives should be undertaken by a workplace ballot. Typically, there is a formal statement / agreement provided by the employer recognising the role and remit of the representative individual or group, and how management will engage with that group. The facility should also be able to provide information on how the worker representative or committee is recognised by management or how it operates e.g. through a formal group, workplace forum etc.
Full conformance	
There is evidence of either an elected workplace representative OR an elected workplace committee. AND There is a recognition agreement of that representative or committee by senior management.	

7.10 Zero tolerance and remediation

7.10	The facility shall have a documented remediation procedure for dealing with child, forced, bonded, involuntary prison labour or involuntary labour in place that: · includes remediation actions that put the best interest of the person first · requires that remediation actions are documented and are verified to ensure effectiveness · is tailored to meet the specific requirements dependant on the age of the worker
Guidance:	If the preceding sections of this Standard have been effectively implemented, remediation procedures may not be required in practice. However, they are important to have in place to demonstrate that a facility has a zero-tolerance approach towards modern slavery and ensures any employees found in this situation are managed in line with best practice and that they are protected. A remediation policy / procedure provides clarification of how a facility deals with situations if/when the listed forms of severe human rights or labour rights abuses have been identified. If such a situation ever arises, it is important that the facility is prepared to rectify and remediate the situation. And most importantly, look after the employee concerned. Procedures shall specify the types of actions expected for adults and children, such as resolving debts or other forms of bondage, and enabling revised employee conditions, repatriation, or continued education in the event of it relating to a child. Note: Online guides are available relating to best practice in remediation policies. These are available from the ILO, NGOs / charitable organisations etc.
Full conformance	
There is a remediation procedure covering all the requirements stipulated.	

7.11 Community Engagement

7.11.1	The facility shall have a written evaluation of the potential impacts of its direct operations on the local community and include remediation and management actions taken to address those impacts.
Guidance:	The facility has a procedure for assessing community impact, and this is fully documented covering all the requirements stipulated.
Full conformance	
There is a documented review of how the facility affects the local environment and how these are managed / avoided / reduced.	

7.11.2	The facility shall provide and document its support for the local community.
Guidance:	Many facilities have been established in areas traditionally associated with commercial fishing and are an intrinsic part of the local community/regions, providing essential employment opportunities. Conversely, there are facilities for which the local environment is quite different. Facilities shall maintain good relations with the local community regardless of its importance and location. This may include actions the facility takes to support the local community, e.g. sponsorship, open days, work placements, holding local community meetings etc.
Full conformance	
Records with appropriate details are available.	

Section 8: Environmental accountability

8.1 Environmental permits and compliance

8.1.1	The facility shall provide copies of permits (as applicable) for environmental emissions regulations for the following: · emissions to air (including greenhouse gases) · discharge to water · release of toxic or hazardous substances · noise, smell, and dust pollution · ground pollution
Guidance:	Different countries may have different permit requirements. Separate permits may not be available, some facilities may only require one overarching license to operate. Others may require local and national permits. The auditor will be familiar with the country requirements, but the facility must be able to show that it is permitted to operate and is compliant with relevant environmental requirements.
Full conformance	
Records with all appropriate details are available. All records must be kept for a minimum time period of 3 years	

8.1.2	The facility shall provide documentation to demonstrate compliance with the requirements specified in permits from Clause 8.1.
Guidance:	The facility shall be able to show the auditor, records of ongoing compliance with legal requirements / permits. Examples of evidence can include latest reports from enforcement/regulators to show the facility is compliant.
Full conformance	
Records with all appropriate details are available.	

8.2 Environmental risk identification and management

8.2.1	The facility has a documented procedure for: · identifying and assessing environmental issues / risks · management / mitigation measures to reduce the likelihood of issues occurring · preventive measures to avoid issues occurring · documenting environmental accidents / incidents · handling accidents / incidents if they arise
Guidance:	The facility has a procedure for assessing environmental impact and this is fully documented covering all the requirements stipulated. Examples of evidence required will be the latest environmental risk assessments undertaken for the facility.
Full conformance	
Records with all appropriate details are available.	

8.2.2	The facility management shall demonstrate awareness of the identified issues and the provisions made to address the associated risks.
Guidance:	Relating to clause 8.2.1, there shall be evidence that the Senior Manager or Chief Executive Officer (CEO) has reviewed the procedure, understood the issues, and agreed with the stipulated provisions to address risks.
Full conformance	
Records with all appropriate details are available, signed by the facility management.	

Appendices

Appendix I: Suppliers

This Appendix summarises the main requirements for managing suppliers.

Supplier approval

Supplier approval and monitoring is an essential part of due diligence checks and verification.

All facilities will need to have a supplier approval and monitoring system, including a documented and up to date list of suppliers. This applies to suppliers of raw materials and ingredients used directly in the production of marine ingredients.

For each supplier there shall be a supplier agreement covering all the requirements for this MarinTrust standard. A supplier agreement is essential to ensure consistent understanding of what the Facility expects and what the supplier shall provide.

Exclusions: There are some countries in which facilities are only permitted to purchase whole fish from online systems operated by industry organisations / regulators. In these countries, the requirement for suppliers excludes whole fish suppliers. If the facility is purchasing whole fish from other sources, these must be covered by a supplier agreement.

This guidance provides an explanation of what should be covered in supplier agreements, based on the essential requirements of this MarinTrust standard. Additional requirements may be included in supplier agreements.

Requirements for suppliers of raw materials and products/ingredients used directly in the production of marine ingredients

Applies to whole fish, by-products, packaging, additives.

Supplier details and approval	Name, details, contact information, legal status, registration number as applicable. To ensure the supplier is a legal entity	Essential
	Annual review and approval of supplier (annual audit)	
The supplier agreement **must** include these contents	Details of product or service supplied	essential
	Classification of MarinTrust approval i.e. MarinTrust approved whole fish or by-product raw materials, raw material certified under a recognised equivalent scheme, or accepted Improver Programme raw materials, or non-approved raw materials.	
	Traceability requirements	
	A social policy or commitment, signed by the suppliers.	This is essential for all suppliers excluding vessels supplying whole fish.

		See below.
Suppliers of fishery raw materials	Assurance that raw materials from IUU fishing will not be supplied	Essential

The supplier agreement **may** also include additional information specific to each facility and supplier.	Legal compliance	Recommended
	Quality	
	Safety	
	Technical specifications (as applicable)	
	Composition (as applicable)	
	Penalties	
	Verification of status e.g. accredited to specific standards (as applicable)	

Additional requirements for suppliers of <u>whole fish</u>

For suppliers of whole fish, there are specific requirements for suppliers.

<u>Exclusions</u>: There are countries where facilities are only permitted to purchase domestic catches of whole fish from systems operated by industry organisations / regulators. In these countries, the requirements for whole fish suppliers shall apply to vessels not managed within that system.

Essential for every <u>vessel</u>	Results of the social risk assessment for vessels supplying whole fish	Essential
	Name of vessel, IMO/registration number (as applicable), call sign, legal owner, name and address, flag state	essential
	Proof of authorisation to engage in the specific fishing activity,	
	All permitted fishing methods and / or gear for the vessel	
	Whether the vessel is, owned by the Facility, or the vessel is supplying under an existing contract, or there is no contract with the vessel	
	Vessels must be authorised for relevant fishing activity(ies).	
Essential for every landing / consignment	Date of discharge to facility,	essential
	Species (including Latin name) and quantity discharged,	
	Catch area and dates of fishing activity where catch originated,	
	Fishing method / fishing gear used for the catch of fish	

Additional requirements for suppliers of by-product raw material:

Quality	A documented policy provided by the supplier to confirm the fish by-product shall come from fish that is intended for human consumption	essential
For each supplier	Supplier name, address / location	essential
	Permitted activity / legal entity / registered food business operation	
	Species, or for mixed by-products containing more than one species, a list / description of species contained in the mix.	
For each batch / delivery of by-products	Supplier name and/or handler name	essential
	Species (including Latin name), or for by-products containing more than one species, a list / description of species (including Latin names) contained in the mix.	
	date of production and/or of dispatch from the supplier	

Specific requirements for suppliers of raw material from aquaculture production

Supplier to verify	The raw material shall show no clinical signs of disease on the day of receipt	essential
	The raw material shall not come from a farm which is subject to a prohibition for animal health reasons and shall not have been in contact with animals from such a farm.	
	The raw material shall be kept segregated and clearly labelled as marine ingredients of the species that they originate from including circumstances where they are mixed with other raw materials both before and post processing	

Specific requirements for suppliers of raw material from that are purchased via a third-party

General	Documentation to allow complete traceback of raw materials to approved fishery or by-product	essential
	A declaration that the third-party supplier understands the requirements of the MarinTrust standard to maintain the product integrity of the MarinTrust compliant raw materials and will comply with them.	
	A signed agreement stating the third-party supplier's commitment to this Standard.	
For each batch / delivery	Supplier name	essential
	Date of receipt	
	Volume or weight of MarinTrust compliant raw materials received.	
	Identification number for the supply e.g. lot / batch number and	
	For by-product supplies, accurate information shall include the key data elements (KDEs) referred to in Section 3.	

Appendix II: Subcontractors

This Appendix provides an explanation of what should be covered in agreements with sub-contractors, based on the essential requirements of the MarinTrust standard. Additional requirements may be included in the agreements, as required by the companies concerned. The first part of this guide relates to requirements for all sub-contractors. The latter part applies only to sub-contracted storage.

For the purposes of the Standard, a sub-contractor undertakes part of the production process on behalf of the Facility. This includes packing, labelling, storage, transport.

Requirements for ALL sub-contractors

Subcontractor approval

Requires a subcontractor agreement covering the requirements of what the Facility expects and what the subcontractor will provide.	essential
Name, details, contact information, legal status, registration number as applicable.	
Annual review and approval	

The sub-contractor agreement **must** include these contents:

Details of subcontracted service provided	essential
Classification of MarinTrust approval i.e. MarinTrust approved fishery material or by-product material, Improver Programme raw materials	
Traceability requirements; Full traceability, segregation, and identification of the MarinTrust compliant marine ingredients and the certified finished products.	
Confirmation of any status e.g. accredited to specific standards (as applicable)	
A social policy or commitment, signed by the suppliers, to demonstrate they agree with the social requirements of the MarinTrust Standard	
Records: The sub-contractor will provide records of MarinTrust compliant raw materials and certified finished products should the Facility require.	

The agreement **may** also include additional information specific to each facility and sub-contractor.

Legal compliance	Recommended
Quality	
Safety	
Technical requirements (as applicable) for example storage requirements,	

ADDITIONAL Requirements for sub-contracted transport

Transport company keeps MarinTrust certified product (raw materials or marine ingredients) separated and clearly identifiable from non-certified materials. The agreement also states that the transport container is kept clean and is free from any contaminants/ materials that may affect the quality/ safety of the product being transported.	essential
Right to refuse; Facility has the right to refuse transportation if it adversely affects the safety and/ or integrity of the MarinTrust compliant marine ingredients. The third-party contractor is required to keep the condition of transport containers clean and free from contaminants.	
Fish by-products shall meet and be handled according to the requirements specified by the Facility which include: no contamination with Land Animal Protein (LAP), chemical, biological, or physical agents.	

ADDITIONAL Requirements for storage including sub-contracted storage

All storage tanks shall be made of smooth, impervious, non-toxic, materials and managed to reduce the risk of product contamination.	essential
Fishmeal storage facilities shall be dry, adequately ventilated to prevent condensation and reduce the risk of dirt and dust contamination.	
Access to storage areas shall be organised to prevent cross contamination with chemical, physical or biological contaminants	
Environmental analysis for relevant micro-organisms shall be carried out in storage areas according to the HACCP based risk assessment.	
There shall be rules for managing the conduct of all personnel relating to personal hygiene, health and safety and food safety, in storage areas.	
If third party storage facilities are used, the Facility shall ensure they can request records from the sub-contractor storage facilities to allow for verification at any point in time. The Facility can demonstrate to the auditor, that the agreement for subcontracted storage, includes the requirement for providing records on request. And that these records relate to MarinTrust compliant raw materials and/or marine ingredients.	
MarinTrust approved/accepted/recognised equivalent raw materials and certified marine ingredients, shall be segregated, and labelled or otherwise identified in a manner that ensures traceability is maintained during storage. MarinTrust certified marine ingredients are clearly labelled in storage, and there is an inventory showing where these are stored.	

Appendix III: Recognition of GMP and HACCP equivalent requirements

(Section 5)

This Appendix provides an overview of the criteria regarding Good Manufacturing Practices (GMP) and food safety if the facility produces marine ingredients, either for feed and/or for human consumption (i.e., crude fish oil, hydrolysed products, etc.).

It covers the main requirements in section 5 good manufacturing practice that may or may not be audited if the facility has a certification recognised as part of the MarinTrust recognition procedure.

Recognition of other standards / schemes

MarinTrust has a 'recognised equivalency procedure' to enable other schemes and benchmarking tools to be recognised, thus enabling those to be used as an alternative to facilities being audited against every section of the Standard for Responsible Supply of Marine Ingredients.

In Section 5, there is a basis for recognising GMP and / or HACCP systems which are approved by national authorities, or third-party certification that includes GMP.

Demonstration of GMP through other certification

A facility with GMP certification approved as equivalent by MarinTrust recognition procedures shall meet all the requirements of section 5.1.

For auditing purposes, facilities must be able to show copies of their certificates and scope to the auditor. Facilities must be able to demonstrate they have a specific HACCP plan covering all the marine ingredients produced for feed and/or for human consumption.

Demonstration of HACCP through other certification

A facility may have HACCP plans approved or certified through other means. If there is a third-party certification of HACCP plans for food and/or feed, in facilities where one or both are produced, the facility will not be audited against HACCP section / clauses.

If a facility has third-party HACCP certification:

- The facility will be audited against section 5.3.
- The facility will not be audited against section 5.4 and subclauses.
- The rest of section 5 will not be audited but the auditor will check the pre-requisites if there are specific additional issues regarding feed and/or human consumption marine ingredients.

Facilities without certification to a recognised equivalent standard are required to be audited against the whole of section 5.3 and 5.4. Is essential to have a HACCP plan that is specific to the end use of the marine ingredients i.e. separate HACCP plans for either food or feed use.

FOOD	FEED
Facilities without certification to a recognised equivalent Standard must have a HACCP plan specific to food use and cover and control all the risks associated with these types of products	Facilities without certification to a recognised equivalent Feed Standard must have a HACCP plan specific to feed use and cover and control all the risks associated with these types of products
The HACCP plan shall meet the regulatory requirements of the country it is supplied to	The HACCP plan shall meet the regulatory requirements of the country it is supplied to

Appendix IV: Tolerance for composition of raw material batches

1. Background

The aim is to have all MarinTrust certified marine ingredients produced from approved raw materials. However, for factors such as **seasonal changes**, different sources/types of **raw material,** it may be unavoidable to fully exclude all non-approved species from every batch. On this basis, MarinTrust allows a tolerance of non-approved* species in raw materials, that is explained in this document.
(*referring only to non-assessed species)

2. Understanding the groups of raw materials

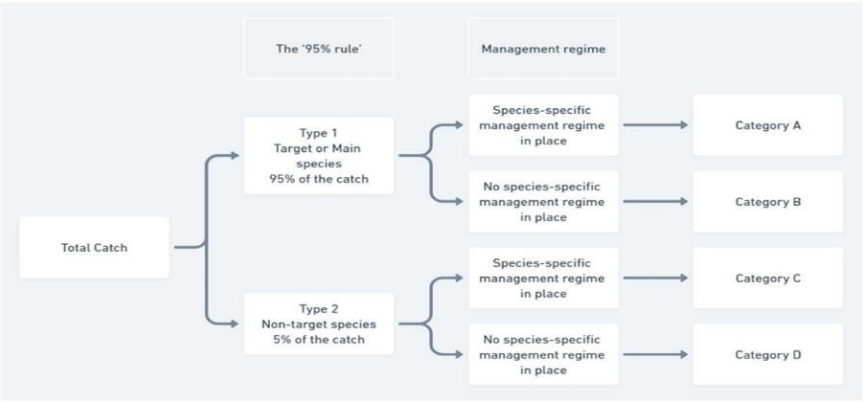
It is important to make clear the definition and grouping of raw materials, for the purpose of the MarinTrust certification scheme.
In first instance there are two groups of raw material:

2.1 Approved raw material:

2.1.1 Whole fish:

This group include approved (fisheries that successfully passed the MarinTrust fishery assessment), accepted (fisheries that are part of the accepted MarinTrust Improver Programme), and recognised equivalent (fisheries certified and related to the GSSI scheme). Thereafter, we will refer to them as “approved” sources.
It includes two types of species:

- Species **type 1** (**target** species): it includes species **category A and/or B**. These species must represent at least 95% of the total annual catch.
- Species **type 2** (**non-target** species, sometime known as bycatch): it includes species **category C and/or D.** These species may represent a maximum of 5% of the annual catch.



2.1.2 By-products: the approved raw material includes those species that underwent the MarinTrust by-product risk assessment and passed it successfully resulting

in the following final levels of risk:

- Low risk by-product species (MarinTrust approved source)
- Medium risk by-product species (MarinTrust approved source with caution)

2.2 Non-approved raw material:

This group comprises raw materials that are not "approved" according the MarinTrust requirements. It includes:

2.2.1 Failed: species that do not meet the MarinTrust requirements:

- Whole fish: fisheries that have failed the MarinTrust whole fish fishery assessment (category A, B, C, D)
- By-products: species that failed the MarinTrust by-product risk assessment and are thus deemed high-risk as final result.

2.2.2 Non-assessed: species for which a MarinTrust whole fish fishery assessment or a MarinTrust by-products risk assessment has not been conducted.

3. Monitoring of raw material

3.1 General considerations:

- All species shall be sourced in line with Section 1 and 3 of the Standard, and clause 2.11 and its subclauses.

- The batch (*) composition of raw material. should align with at least with:
  - Whole fish: >=95% for target species and =<5% for non-target species.
  - By-products: >=90% for approved species and =<10% for other species (excluding high-risk by-products)

  *(*) **Raw material batch definition**:*

  Whole fish: Per vessel

  By-products: Each delivery/intake (e.g., by truck, by container, or by supplier in cases of continuous delivery). Each company may define this individually, as long as the batch does not exceed the raw material received in a 24-hour period.

- Any percentages detailed in this guide are only applicable at the raw material level; compliance leads to the raw material batch being MarinTrust approved or accepted (as applicable), and all finished products made from that batch are consequently considered approved or accepted (as applicable)

- Where the relevant percentage is close to the specified limits, mentioned in this guidance, the **precautionary principle** must be applied by the certificate holder.

- The tolerance for non-assessed species is a last resort, intended only for unavoidable and unintentional reasons. It is not permitted to deliberately mix separate batches of approved/accepted and non-approved raw material. **This tolerance shall not be exceeded in the period of ROLLING 12 months period.**

- If a received batch has over the tolerance level of non-approved species, the facility can manually remove those species to reduce the quantity to below the tolerance level.

- Compliance with this guide does not supersede (override) the requirement for each company to meet all applicable legal regulations. Companies must always comply with the stricter requirements.

- Auditors are required to document the percentages and quantities related to this guidance in the audit report for each species involved.

- It is not permitted to deliberately blend or mix separate batches of certified and non-certified marine ingredients (e.g. fish oil) and sell them as certified. This automatically disqualifies those marine ingredients from being sold as MarinTrust certified.

3.2 Whole fish monitoring

The procedure for monitoring whole fish at the intake point follows the sequence of the flowchart decision tool (supplement Nº 1). For the best understanding, it is advisable to keep both documents open in parallel.

Notes:

- The percentages mentioned in this guide are based on weight. These percentages do not apply to each individual species; it is applicable for each fishery independently (the combined total of target and its non-target species).
- Raw material from the Improver Programme must be segregated from MarinTrust fully approved raw material.

Step 1: Fishery source confirmation

- Confirm the approval status of the target species (category A/B)
  - If APPROVED/ACCEPTED IP: Proceed to Step 2.
  - If NON-APPROVED: The batch must be segregated as non-MarinTrust compliant.

Step 2: Raw material batch composition

- Verify if the batch contains other species (other than the target species)
  - If NOT: The batch can be used to produce MarinTrust ingredients (certified or IP, as applicable)
  - If YES: Proceed to Step 3.

Step 3: Review the approval status of the other species present in the raw material batch

- Determine if the other species are approved/accepted or if they are non-assessed. *(Species are considered approved if they are included in the relevant fishery assessment report)*
  - If APPROVED: for approved species category C/D the allowable limit of presence in the batch is 5%. Proceed with step 4
  - If NON-ASSESSED: The allowable limit of presence for these other species in the batch is 5%. Proceed with step 4

  Note: The 5% limits for C/D approved species and 5% for non-assessed species are applied independently.

Step 4: Current batch percentage compliance review

- Identify the cumulative percentage of all other species in the current batch.
  - If the percentage is 5% or less: The batch is considered MarinTrust
  - If the percentage is more than 5%: Proceed to step 5.

  Note: if the percentage of these other species is 40% or more, the current batch must be segregated as non-MarinTrust, even if the cumulative 12-month percentage is below the allowable limit. The percentage will be subject to review and potential change as development progresses.

Step 5: Cumulative 12-month percentage compliance review

- Review the cumulative percentage of those species over the last 12-month period for the related fishery and each group (approved/accepted species and non-assessed species)
  - If the 12-month cumulative percentage is 5% or less: The current batch is also considered MarinTrust
  - If the 12-month cumulative percentage is more than 5%: The current batch is considered non-compliant and must be segregated as non-MarinTrust.

For further guidance review the supplement Nº 1 that includes some examples.

3.3 By-products monitoring

The procedure for monitoring by-products follows the sequence of the flowchart decision tool (supplement Nº 2). For the best understanding, it is advisable to keep both documents open in parallel.

Note:

- These percentages are based on weight of the species in each batch of raw materials received.
- ***Failed by-product species*** *(species that are considered as high risk as result of the MarinTrust by-product risk assessment), shall not be sourced by MarinTrust certified facilities (MarinTrust Standard clause 2.11.3.3).*

Step 1: Fishery source confirmation

- Confirm if the general batch of raw material is consisted by MarinTrust-approved by-products

- If YES: Proceed to Step 2.
- If NOT: The batch must be segregated as non-MarinTrust approved (non-assessed species)

Step 2: Raw material batch composition check

- Verify if the batch contains any other non-assessed species (unintentional presence of)
  - If NOT: The batch is considered MarinTrust approved.
  - If YES: Proceed to Step 3.

Step 3: Non-assessed by-product species percentage review

- Identify the cumulative percentage of all other species in the current batch.
  - If the percentage is 10% or less: The batch is considered MarinTrust approved.
  - If the percentage is more than 10%: Proceed to step 4.

  Note: if the percentage of these other species is 40% or more, the current batch must be segregated as non-MarinTrust, even if the cumulative 12-month percentage is below the allowable limit. The percentage will be subject to review and potential change as development progresses.

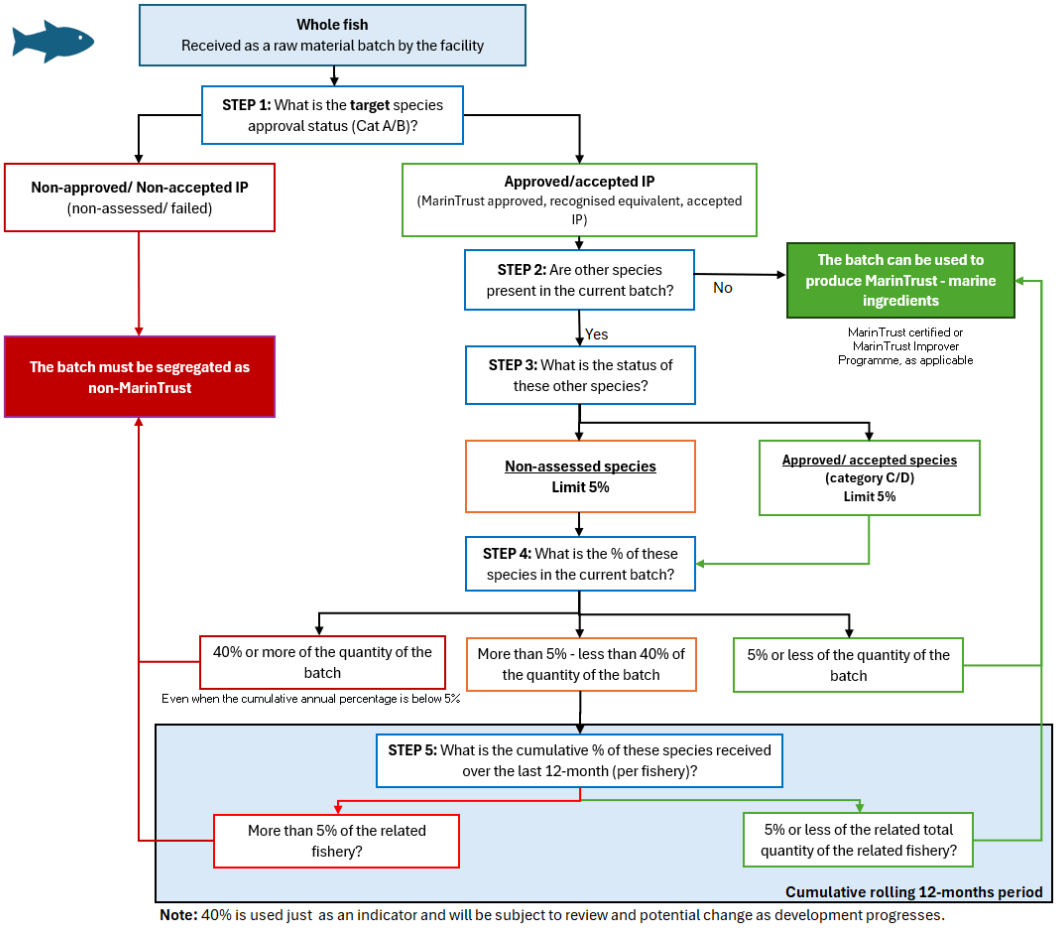
Step 4: Cumulative 12-month percentage compliance review

- Review the cumulative percentage of those by-product species over the last 12-month period
  - If the 12-month cumulative percentage is 10% or less: The current batch is also considered MarinTrust
  - If the 12-month cumulative percentage is more than 10%: The current batch is considered non-compliant and must be segregated as non-MarinTrust.

Note: For mixed whole fish and by-products, the allowance tolerance for non-assessed species level is 10% total (note that whole fish should be the minority).
For further guidance review the supplement Nº 2 that includes some examples.

Supplement Nº 1 – Whole fish

a) Monitoring tool



b) Examples of monitoring and decision-making

Example - Whole fish

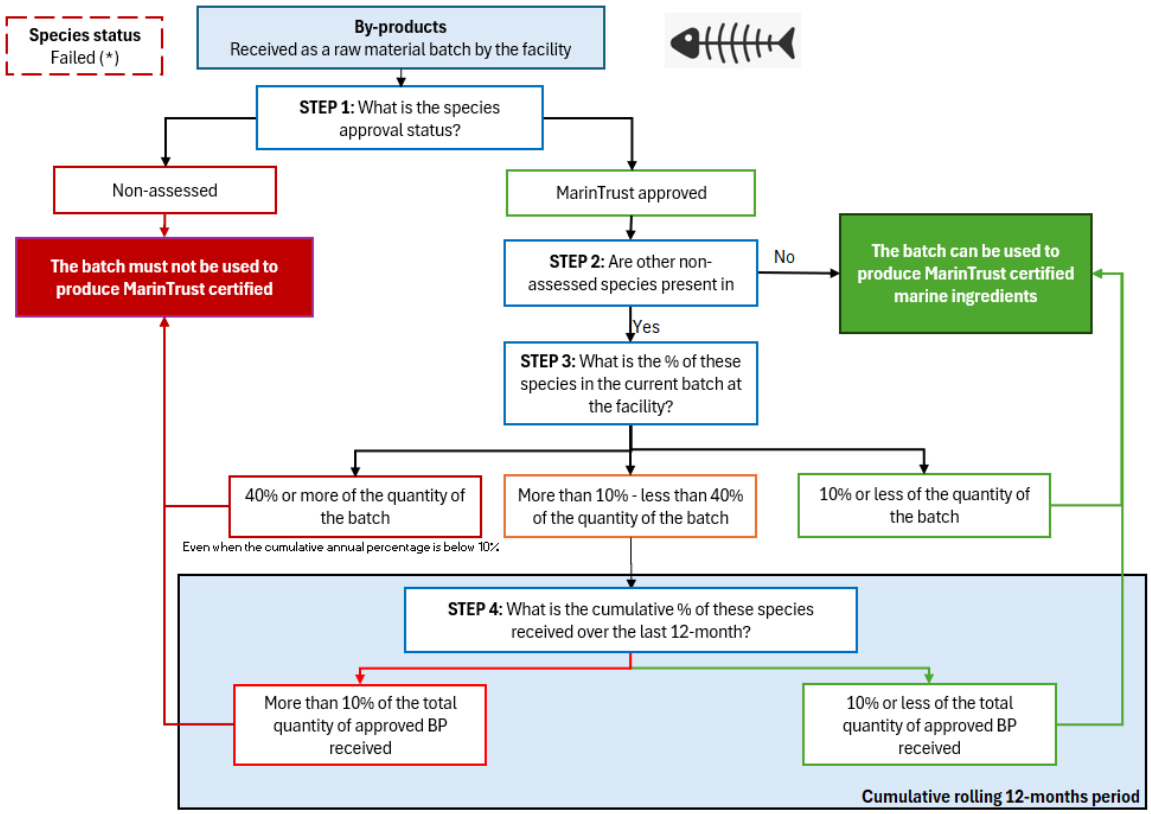
General information for the case:

- **Date of Batch:** 14th October 2025
- **Data Cut-off Date:** 13th October 2025
- **Cumulative Period:** 13th October 2024 to 13th October 2025 (*for this case, the company has made a cutoff the day before, and they are considering the data from 13th October 2024 to 13th October 2025 for the cumulative 12-month period*)
- **Monitoring unit:** Per vessel
- **Where:** at the intake event, that means at the initial monitoring point for the raw material, for official purposes (e.g. vessel, port, production facility)

Total **approved species A+B – current batch**	**Approved species C+D – current batch**	**Non-assessed species – current batch**	**Annual** Cumulative up to 13rd October – **total approved species C+D**	**Annual** Cumulative up to 13rd October – total **non-assessed species**	Compliance Decision	Reasoning
97% 97 TM	Total**: 3% (3 TM)** Cat. C: 1% Cat. D: 2%	No	Total: 2% (700 TM)	Total: 7% (4500 TM)	Compliant	The total percentage of species cat. C+D in the batch is 3%. Since 3% is less than 5% limit, the batch is compliant. Review of cumulative data is not required.
92% 92 TM	Total: **8% (8 TM)** Cat. C: 4% Cat. D: 4%	No	Total: 2% (1000 TM)	Total: 7% (4000 TM)	Compliant	The total percentage of species cat. C+D in the batch is 8% (greater than 5%). Therefore, the company must review the cumulative data C+D. Since the cumulative percentage is 2% (less than 5%), this specific batch is still considered compliant.
92% 92 TM	Total: **8% (8 TM)** Cat. C: 4% Cat. D: 4%	No	Total: 6% (4000 TM)	Total: 7% (4500 TM)	Non-Compliant	The total percentage of species cat. C+D in the batch is 8% (greater than 5%). The company must review the cumulative data. Since the cumulative data C+D is 6% (greater than the 5% limit), this specific batch is considered non-compliant.
96% 96 TM	Total: **4% (4 TM)** Cat. C: 2% Cat. D: 2%	No	Total: 8% (4500 TM)	Total: 7% (3000 TM)	Compliant	The total percentage of species cat. C+D in the batch is 4%. Since 4% is less than 5% limit, the batch is compliant. Review of cumulative data is not required.
93% 93 TM	Total: **4% (4 TM)** Cat. C: 2% Cat. D: 2%	Total: **3% (3 TM)**	Total: 8% (4500 TM)	Total: 7% (4000 TM)	Compliant	The total approved species cat. C+D is 4% (less than 5%), and the non-assessed species total is 3% (less than 5%). Since neither percentage exceeds the 5% limit, the batch is compliant. Review of cumulative data is not required.
87% (87 TM)	Total: **6% (6 TM)** Cat. C: 3% Cat. D: 3%	Total: 7**%** **(7 TM)**	Total: 1% (800 TM)	Total: 1% (900 TM)	Compliant	The total approved species cat. C+D is 6% (greater than 5%), and the non-assessed species total is 7% (greater than 5%). The company must review the cumulative data from the last 12-month rolling period. Since the cumulative percentage for each case is 1% (less than 5%), the batch is still considered Compliant.
87% (87 TM)	Total: 6**% (6 TM)** Cat. C: 6%	Total: 7**%** **(7 TM)**	Total: 3% (1000 TM)	Total: 8% (4500 TM)	Non-Compliant	The total approved species cat. C+D is 6% (greater than 5%). The company must review the cumulative data from the last 12-month rolling period. Since the cumulative percentage is 3% (less than the 5% limit), until here the batch is compliant. However, the total non-approved species is 7% (greater than 5%). The company must review the cumulative data from the last 12-month rolling period. Since the cumulative percentage 8% (more than 5%), this complete specific batch is considered non-compliant.
90% (90 TM)	Total: **6% (6 TM)** Cat. C: 3% Cat. D: 3%	Total: 4**%** **(4 TM)**	Total: 7% (3500 TM)	Total: 2% (1200 TM)	Non-Compliant	The total approved species cat C+D is 6% (greater than 5%). The company must review the cumulative data from the last 12-month rolling period. Since the cumulative percentage is 7% (greater than the 5% limit), the batch is non-compliant. The total non-approved species is 4%, however, review the cumulative data is not needed, as this complete raw material batch is already non-compliant for the reason explained in the previous paragraph.

Supplement Nº 2 – By-products

a) Monitoring tool



(*) Failed (species that are considered as high risk as final result of the by-products risk assessment), shall not be sourced by MarinTrust certified facilities (MarinTrust Standard clause 2.11.3.3).
Note: 40% is used as an indicator and will be subject to review and potential change as development progresses.

b) Examples of monitoring and decision-making

General information for the case:

- **Date of Batch:** 14th October 2025
- **Data Cut-off Date:** 13th October 2025
- **Cumulative Period:** 13th October 2024 to 13th October 2025 (*for this case, the company has made a cutoff the day before, and they are considering the data from 13th October 2024 to 13th October 2025 for the cumulative 12-month period*)
- **Monitoring unit:** usually by each delivery – intake (e.g. by truck, by container, or by supplier with continuous delivery (*determined by each company but as a maximum of 24 hours batch*)
- **Where:** at the intake event, that means at the initial monitoring point for the raw material, for official purposes (e.g. marine ingredient facility)

Total Approved species – current batch	Non-assessed species in raw material batch	Annual Cumulative up to 13rd October non-assessed species %	Compliance Decision	Reasoning
94% (94 TM)	6% (6 TM)	1% (80 TM)	Compliant	The non-assessed species total is 6% (≤10%). Since its percentage does not exceeds the 10% limit, the batch is compliant. Review the cumulative percentage is not required.
89% (89 TM)	11% (11 TM)	1% (100 TM)	Compliant	The non-assessed species total is 11% (>10%). Then the company must review the cumulative percentage from the last 12-month rolling period. Since the cumulative percentage is 1% (<10%), the batch is compliant.
89% (89 TM)	11% (11 TM)	12% (1500 TM)	Non-Compliant	The non-assessed species total is 11% (>10%). Then the company must review the cumulative percentage from the last 12-month rolling period. Since the cumulative percentage is 12% (>10%), the batch is non-compliant.
93% (93 TM)	7% (7 TM)	12% (1200 TM)	Compliant	The non-assessed species total is 7% (<10%). Since its percentage does not exceeds the 10% limit, the batch is compliant. Review the cumulative percentage is not required.

4. Future outlook

- Facilities must inform MarinTrust when raw material intake data shows an **increasing trend** of Category C/D species (for whole fish) or non-assessed species (for whole fish and by-products), so that the next steps (such as species categorisation changes or requesting a new assessment) can be determined.
- In the long term it is envisaged that tolerance levels will be reduced and/or eliminated wherever possible.
- Effective monitoring of raw materials is essential to reinforce supply chain assurance and uphold responsible sourcing practices

5. Additional clarifications

- Further guidance on how to clarify that a batch of marine ingredients (such as fishmeal or others) remains MarinTrust certified, even if the batch-level limit is exceeded, provided it is recorded and **confirmed** that **compliance is maintained over the cumulative rolling 12-month period,** especially where a customer requests percentages for each species

It is the responsibility of certificate holders to demonstrate that their products meet the requirements. To support this, there are different ways certificate holders can communicate the relevant information to their customers, for example through a note in the traceability or commercial documents, or via a declaration confirming that the product is MarinTrust certified under the cumulative rolling 12-month requirement. This would help facilitate efficient trading processes.
Additionally, customers may request further information from the certificate holder, who shall ensure that the relevant information is available, up to date and accurate.

- Keeping a record of the quantities and percentages for all species, and any potential stratifications that could be applied.

  Typically, the first stratification is separated into two groups: whole fish and by-products:

  - Whole fish: The facility shall keep records for each fishery, including their target species and non-target species (approved categories C+D, maximum 5%). When applicable, also record the quantity/percentage of non-assessed species (maximum 5%). These records should be kept per batch and as cumulative data (quantity and percentage)
  - By-products: The facility shall keep records for the quantity and percentage for approved species, also the quantity and percentage for non-assessed species (maximum 10%), both at batch level and cumulative level.

- Overview of the cumulative 12-month period.

  The cumulative data is calculated over the LAST 12 months. Companies typically apply, for example, the following approaches:

  - Cut-off production date: The cumulative calculation is done up to the day before the cut-off production date.
  - Continuous process: The cumulative calculation is done up to the reception (intake) of the current batch of raw material.

  In both cases, it is important that the facility documents this approach in its procedures so that all personnel are clear on how the cumulative data is calculated and applied.

- A reason why facilities need to include the definition of “raw material batch” for whole fish and by-products in their procedures.

  It needs to be clearly defined in their procedures, as this is key information for monitoring raw material intake, and it is also the basis on which the auditor will review the facility data.