



# Chain of Custody Standard Version 2.1

## Public interpretation guidance

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**CONFIDENTIAL MATERIAL**

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## Foreword

MarinTrust is the leading independent business to business certification programme for the marine ingredients value chain.

Responsible sourcing and manufacturing are vital if marine ingredients are to remain a relevant ingredient in feed for aquaculture, agriculture, pet care and directly in the production of consumer products, including cosmetics and nutraceuticals. Fishmeal and fish oil make up the largest share of marine ingredients today, however all marine ingredients are included in MarinTrust's scope.

To enable stakeholders to credibly demonstrate the commitment to responsible practice in areas of feed safety, raw material procurement, delivery, and throughout the production process, MarinTrust developed a robust certification programme<sup>1</sup>, consisting of three main components:

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

Standards under the MarinTrust programme are developed in accordance with the International Social and Environmental Accreditation and Labelling (ISEAL) code and follow International Organization for Standardization (ISO) guidance. The programme is managed by the MarinTrust secretariat under the MarinTrust governance led by its Governance Body Committee (GBC) and associated multi-stakeholder committees.

To become certified under the MarinTrust programme, applicants must be able to demonstrate compliance with the Standard criteria, through a third-party audit conducted by an independent, ISO/IEC 17065 accredited Certification Body approved to certify against MarinTrust Standards. Certificate holders who have demonstrated compliance to the MarinTrust Standard(s) can apply to the MarinTrust Secretariat for use of the Certified MarinTrust Logo<sup>2</sup>.

The MarinTrust programme is recognised and endorsed throughout the marine ingredient value chain and by aquaculture certification programmes including Best Aquaculture Practices (BAP), Aquaculture Stewardship Council (ASC) and Global Good Agricultural Practices (Global G.A.P), as well as feed manufacturers, retailers, and pet food manufacturers.

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<sup>1</sup> The official language of this standard is English. The definitive version is maintained at [www.marin-trust.com](http://www.marin-trust.com). Any discrepancy between copies, versions or translations shall be resolved by reference to the definitive English version.

<sup>2</sup> Further Information regarding application, rules and regulations can be found on the MarinTrust website [www.marin-trust.com](http://www.marin-trust.com) or by contacting Standard Owner at [standards@marin-trust.com](mailto:standards@marin-trust.com) and/or approved Certification Bodies listed [here](#).

# Introduction

## Introduction to the MarinTrust Chain of Custody Standard (CoC)

In 2018 MarinTrust Chain of Custody Standard V1.1 underwent an extensive review, in line with good practice and in compliance with the ISEAL Standard Setting Code requirement. This review identified areas of opportunity and improvement, and these were documented in a new Terms of Reference for the development of a MarinTrust Chain of Custody Standard V2.0.

The MarinTrust Chain of Custody Standard V2.0 was published on 31 August 2020 and made effective from 30 November 2020.

Since launch, the Standard has been through a further detailed review as part of an accreditation process. Further to this, and in response to stakeholder feedback, changes have been made. This updated V2.1 was issued in February 2026.

Through the programme framework, the requirements for certification are subject to continual review and improvement. Subsequent reviews of the standard will be carried out at least every five years to ensure continued relevancy and effectiveness to achieve its stated objectives.

The purpose of this Chain of Custody Standard is to provide the industry with a clear statement of the requirements of Chain of Custody certification and to provide an assurance to a labelled certified claim on a feed or fish oil product that it uses marine ingredients that originate from a certified 'MarinTrust Facility'.

Key objectives:

- To ensure that marine ingredients used come from MarinTrust certified sources and that full traceability is maintained throughout the supply chain.
- To ensure no illegal, unreported and unregulated (IUU) fishery materials are used
- To ensure pure and safe products are further processed under a robust quality management system, thereby demonstrating freedom from potentially unsafe and illegal materials
- To ensure that MarinTrust CoC Standard remains relevant, robust, and fit for purpose.
- To prevent non-certified marine ingredients being labelled as MarinTrust certified.

## Main features of the revised MarinTrust Chain of Custody Standard

The key features of the MarinTrust Chain of Custody Standard V2.1 are summarised below:

### 1) Audit Technology

- Use of emerging technology (e.g. Key Data Element transfer through the supply chain) to source the origin of MarinTrust certified marine ingredients

### 2) Standard Collaboration

- Recognition of other standards and regulatory authority standards to meet in part or in full the requirements of the MarinTrust Chain of Custody Standard

### 3) Quality Assurance

- Identify ways of detecting fraudulent activities (e.g. adulterations and substitution) by having rigorous traceability system checks e.g. mass balance checks and volume reconciliations within the standard and systems to handle non-conforming products
- Improve the use of the MarinTrust logo and claim to protect the integrity of the entire programme
- Continue the current certification model to ensure it remains in alignment with ISO/IEC 17065 and the ISEAL Code.

### 4) Streamlining Requirements

- Standard and certification requirements at each link in the chain need to be reviewed to seek areas of opportunity to streamline, especially in the wholesaler/trader/sub-contractor sectors and requirements.

A summary of the changes from MarinTrust Chain of Custody (CoC) Standard V2 to V2.1 is included below:

Section	CoC V2.0	CoC V2.1	Differences
All	All	Improvements to guidance	Content for 'full compliance' and guidance notes has been revised notably in parts of sections 1 and 2 to improve clarity and consistency.
All	All	Terminology	Renaming 'traceability verification test' to 'traceability checks' Removing the term 'test' from Section 2 relating to traceability checks. Changing 'MarinTrust compliant' to 'MarinTrust certified'
N/A	N/A	Addition of section 'Other schemes'	New section to provide information on other schemes referred to in this standard. Revision to the list of schemes included.

		referred to in this standard'	
N/A	N/A	Removed references to Global Food Safety Initiative (GFSI)	Removal of GFSI benchmarked schemes from recognised third-party standards. This is replaced with reference to third party food safety schemes (as mentioned in the row above).
N/A	Definitions	Removed	Removal of definitions list and reference to definitions document available from the MarinTrust website.
Eligibility	Eligibility	Revised	The list of eligible applicants has been amended. The activity 'oil refiners' is removed as it is included within 'secondary processor'. Pre-requisites refers to 'eligible activities' replacing the previous list of detailed activities. Pre-requisite requirement a) has been revised to reflect the removal of GFSI and now refers to "Relevant third-party safety/quality certification, as applicable for food or feed".
Normative references	Normative references	Revised	Removal of GFSI standards. Replaced with Codex Alimentarius General Principles of Food Hygiene.
1	1.2 and 1.2.1.1 references to MSC	Revised	Revised to MarinTrust recognised equivalent fishery  Revised evidence requirements for demonstration that training has been provided
1	Clause 1.3.1.1	Revised	Removal of derogation / time bound requirements
1, 2	Clause 1.7 and Clause 2.3	Revised	Removal of 'minor non-conformities being left open until records for the 3 year period are available'. Revised with new requirements in place for new applicants in the first certification cycle.
2	Clause 2.4	Revised	Removal of derogation / time bound requirements Revised submission of information from quarterly to annual
2	References to verification and traceability tests	Revised	Removed the word 'verification'. Changed traceability test to traceability check.

## Scope and applicability

The CoC standard applies to marine ingredient processing facilities, defined as being the unit of certification. These include all locations and scales of operation for marine ingredient processing activities such as further processing, packing, refining and/or trading of marine ingredients after the certified MarinTrust marine ingredient producing facility.

This document outlines the requirements that shall be achieved for certification to the MarinTrust Chain of Custody Version 2.1 Standard and defines the criteria for the sourcing and manufacturing of marine ingredients.

Applicants must have been in production for a minimum of 6 months prior to the certification audit date; however, applicants may apply to the programme prior to this, in order ensure that they are audit ready.

## Eligibility and prerequisites

An applicant could be a:

- Primary processor
- Secondary processor
- Storage provider
- Trader

The MarinTrust website and definitions provide more information on the types of applicants / activities that are eligible to apply.

Applicants are advised to carry out a self-assessment against the MarinTrust CoC Standard to ascertain readiness for external assessment. Applicants must ensure that they have all necessary records of performance data covering the periods of time specified in the MarinTrust CoC Standard available immediately prior to the audit for certification.

For the applicant to qualify for application and subsequent certification against the MarinTrust CoC Standard, the applicant shall meet the following prerequisite eligibility requirements:

- 1) The applicant shall be involved in the eligible activities associated with certified MarinTrust marine ingredients and, (if applicable) marine ingredients from the MarinTrust Improver Programme.
- 2) The applicant shall be legally licenced in the country of operation.
- 3) The applicant shall provide evidence that it satisfies the following minimum entry criteria for the scope under certification:
  - a) Relevant third-party safety/quality certification, as applicable for facilities / businesses handling food or feed.

- b) Social accountability – meet the requirements of its national regulatory authorities that oversees its operation.
- c) Environmental accountability – meet the requirements of the national regulatory authorities that oversees its operation.
- 4) A disclaimer stating that the audit is limited to the CoC (regulatory requirements, traceability, mass balance, labelling, MarinTrust logo use) shall be signed.

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

## Normative References

The documents listed below, contain provisions that underpin this MarinTrust CoC Standard:

- ISO 19011:2018 – Guidelines for auditing management systems
- ISO/IEC 17021-1:2015 – Conformity assessment — Requirements for bodies providing audit and certification of management systems
- ISO/IEC 17065:2012 – Conformity assessment — Requirements for bodies certifying products, processes, and services
- ISO/IEC Guide 2:2004 – Standardisation and related activities
- ISO 22005:2007 – Traceability in the Feed and Food Chain
- ISO/CD22095 Chain of Custody
- ISO 12875/77:2011 Traceability for finfish products
- International Social and Environmental Accreditation and Labelling (ISEAL) Code of Good Practice for Sustainability Systems (the ISEAL Code)
- Codex Alimentarius HACCP Standards.
- Codex Alimentarius General Principles of Food Hygiene.
- GMP+ animal feed standards
- Global Dialogue on Seafood Traceability (GDST)
- GS1 Global Traceability Standard
- GS1 Foundation for Fish, Seafood and Aquaculture Traceability Guideline
- MarinTrust logo guidelines

## Definitions

Definitions and terms are published on the MarinTrust website.

## Legal references

Applicants shall fully meet the legal obligations that are in place for the jurisdiction(s) where marine ingredients are processed to be considered for certification. This certification does not exempt an applicant or existing certificate holder from meeting its legal obligations and, if it is successfully prosecuted by its regulatory jurisdiction, the facility's certification status to this Standard shall be investigated and may be withdrawn depending on the nature of the offence committed.

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 failure of a facility to meet its legal obligations.

## Acknowledgements

MarinTrust would like to thank the members of the MarinTrust governance committees and stakeholders for their commitment, expertise, and contributions throughout the development of this MarinTrust Chain of Custody Standard.

## Section 1 – General Principles of Traceability

<b>1.1</b>	The applicant shall have a documented and signed policy that states that it is are committed to achieving and adhering to the requirements of this MarinTrust Chain of Custody (CoC) Standard.
<b>Full Compliance:</b>	
The applicant facility has a written commitment to the MarinTrust Chain of Custody Standard. This document has been approved and signed by the applicant’s CEO or an equivalent senior manager.	
<b>1.1.1</b>	The applicant shall have a process to ensure that this policy is communicated to all staff within the facility.
<b>Full compliance:</b>	
The applicant can demonstrate that this policy has been fully communicated to all staff within the facility. For example, during new staff inductions, staff training etc.	
<b>Additional notes:</b>	
The rationale of this clause is to reinforce that all staff in the applicant’s organisation are aware of this commitment to this standard to drive positive behaviour to ensure they continuously meet the requirements of the standard. This policy could be communicated through various channels such as training workshops, new staff inductions, posters etc.	
<b>1.2</b>	The applicant shall have a documented and <b>effective supplier approval and monitoring system</b> to ensure that incoming marine ingredients intended to be identified as certified, are sourced from an approved fishery, or a certified supplier that holds a valid MarinTrust or MarinTrust CoC certification.
<b>Full compliance:</b>	
The applicant shall have an up-to-date system of MarinTrust certified suppliers and be able to demonstrate that they hold a valid MarinTrust or MarinTrust CoC certification.	
<b>Additional notes</b>	

The applicant shall ensure that only marine ingredients that have been produced in a MarinTrust certified facility from an approved MarinTrust fishery or MarinTrust recognised equivalent fishery, are used to produce certified marine ingredients. The MarinTrust certified marine ingredients suppliers should be listed separately on an approved supplier list, which is a different list to those that do not handle MarinTrust certified marine ingredients, to clearly show separation. A single list is acceptable only if the MarinTrust certified marine ingredient suppliers are identified.

For details on recognised equivalent fisheries, refer to the MarinTrust website.

<b>1.2.1</b>	For MarinTrust certified marine ingredients that are purchased via a third-party agent or broker that does not physically handle or own the certified product, the following shall apply:
<b>1.2.1.1</b>	The <b>applicant shall have documents/evidence provided from these suppliers</b> in place, to prove the identity of the marine ingredients back to an approved fishery or by-product.

**Full compliance:**  
If the third party is not certified to the MarinTrust CoC Standard, the third party can provide full documentation to allow complete traceback of marine ingredients to an approved fishery, or a supplier that holds a valid MarinTrust or MarinTrust CoC certificate.

**Additional notes:**  
The applicant shall ensure that only marine ingredients that have been produced in a MarinTrust certified facility from an approved MarinTrust fishery, or recognised equivalent fishery, are used to produce certified marine ingredients. For information on 'recognised equivalent' fisheries, refer to MarinTrust website.  
If agents or brokers own the product then they will be treated as any other supplier and will need a MarinTrust CoC certificate. If applicable and if they do not wish to be certified, then they will be treated as subcontractors to the applicant and shall follow the requirements in Section 3.

<b>1.2.1.2</b>	The applicant shall ensure that third-party agents or brokers have been trained/made aware/informed on the requirements to maintain the product integrity status of these certified marine ingredients and shall sign a form stating their commitment to the MarinTrust CoC standard.
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**Full compliance:**

**Full Compliance:** If third-party agents or brokers are used to source supplies of the MarinTrust certified marine ingredients there shall be documented evidence that training has been provided by the applicant to the third-party agents or brokers, to ensure that they fully understand and commit to comply with the requirements of the MarinTrust CoC standard to maintain the product integrity of the MarinTrust certified marine ingredients. Evidence shall include the training dates, list of attendees, and overview of the training content. After this training has been completed, the agents/brokers shall provide a signed declaration that they understand the requirements and will comply with them.

<b>1.2.1.3</b>	The applicant shall ensure that the third-party agent or broker has been trained/made aware/informed of the requirements to maintain the product integrity status of these certified marine ingredients by an approved consultant or trainer to the MarinTrust programme.
<b>Full compliance:</b>	
There is full documentary evidence that all agents/brokers have been trained by an approved trainer /consultant to the current MarinTrust standard	
<b>Additional notes:</b>	
Approved consultant or trainer/training provider is the individual appointed by the applicant that has an effective understanding of the marine ingredients processing activities and the current version of the MarinTrust Chain of Custody Standard.	
Evidence shall include details of who delivered the training, and how they are competent to deliver the training. Examples can include they have attended MarinTrust training for the specific standard, they have prior experience of the scheme in a different facility, or they have built up experience and knowledge in their current role over a period of time.	

<b>1.3</b>	A batch/lot record of all MarinTrust certified marine ingredients shall be fully maintained.
<b>Full compliance:</b>	
Batch/lot record of all MarinTrust certified marine ingredients is fully maintained.	
<b>Additional notes:</b>	

A batch/lot record is required for the traceability check (see clause 2.5 requirements) and volume reconciliation and will support in fraud mitigation from batch/lot number duplication or product substitution.  
 New applicants must have at least one batch that has been supplied to a customer.

<b>1.3.1</b>	<p>The batch/lot record shall contain the following information:</p> <ul style="list-style-type: none"> <li>• supplier name.</li> <li>• supplier unique MarinTrust certificate number.</li> <li>• volume of MarinTrust certified marine ingredients received from each supplier.</li> </ul>
<b>1.3.1.1</b>	<p>The batch/lot record shall contain the following information:</p> <ul style="list-style-type: none"> <li>○ Key Data Element (KDE) information on the source fishery for whole fish to include:           <ul style="list-style-type: none"> <li>▪ name of vessel, registration details of the vessel, flag state of the vessel.</li> <li>▪ species including common and Latin name.</li> <li>▪ catch area</li> <li>▪ date of discharge from the vessel.</li> </ul> </li> <li>○ Key Data Element (KDE) information on by-product raw materials, to include:           <ul style="list-style-type: none"> <li>▪ the name of the supplier of by-products used in the marine ingredients.</li> <li>▪ species including common and scientific name. For mixed by-products containing more than one species, a list / description of species (including scientific names) contained in the mix.</li> <li>▪ date of production and/or date of dispatch from the by-product supplier.</li> </ul> </li> </ul>
<b>Full compliance:</b>	
All KDE information is comprehensive and have been entered correctly.	
<b>Additional notes:</b>	
It is important to record this data as it can be used to document where and how much material the applicant is using to a) ensure that a credible statement and assurance can be given to its customers and b) can be used to mitigate potential acts of fraudulent behaviour through duplication or substitution	

If traders are used within the supply chain, additional information may or will need to be sourced to see if this link in the chain undertook any blending operations of the fish meal or fish oil batches to meet with a customer’s bespoke requirements. If blending has occurred, the raw material inputs should be able to be traced back to source.

Beyond the KDEs specified in this clause, additional KDEs are listed in the ‘definitions’ document. available to download from the MarinTrust website. However, for the purposes of this clause, those additional KDEs are not mandatory.

<b>1.4</b>	The applicant shall have a documented product management system in place to demonstrate how MarinTrust certified marine ingredients are segregated and labelled from non-certified product during all the processes within the applicant’s organisation.
<b>Full compliance:</b>	
The applicant has a demonstrably effective product management system in place to keep labelled MarinTrust product segregated from marine ingredients that are produced from non-approved material	
<b>Additional notes:</b>	
Also see requirements for clauses 2.1 and 2.2. The product management system will be appropriate to the context of the organisation. If for example the organisation only ever deals with MarinTrust certified products, then this could be a specific document / statement. If the organisation deals with multiple product lines of similar non-certified product the organisation will have to document in its product management system how MarinTrust certified marine ingredients are kept segregated and labelled from non-certified products, paying particular attention to key handling points (see subclauses for 2.1 and 2.2) where risk of product misidentification / substitution could occur.	

<b>1.5</b>	The applicant shall have in place an effectively implemented procedure to deal with any non-conformances arising from a failure of the marine ingredients product management system stated in 1.4, which may result in MarinTrust certified marine ingredients being mixed with non-certified marine ingredients.
<b>Full compliance:</b>	
The applicant shall have a procedure in its product management system on how to deal with the case where a loss of traceability or eligibility of MarinTrust certified marine ingredients has occurred. This procedure shall include a full root cause analysis as to why this non-conforming product occurred.	
<b>Additional Notes:</b>	

The applicant’s certification body (see clause 1.6.3) and customer (see clause 1.6.4) will be notified in the event of a non-conforming product procedure being activated.  
 This will usually entail the requirement to have an effective quarantine system in place for any product that was found to be outside the scope of this standard or is suspected to be due to a loss of identification and traceability.  
 If a non-conforming product procedure has been activated the applicant shall demonstrate that this was implemented effectively.  
 The non-conforming product procedure would be captured in the applicant’s product management system.  
 If a non-conforming product procedure has been activated previously the applicant shall show that they have implemented this effectively (see subclauses 1.6.1 – 1.6.4).

<b>1.6</b>	Any Corrective Action Plans resulting from a non-conforming products procedure shall be accurately documented and shall include a root cause analysis.
<b>Full compliance:</b>	
Corrective Action Plans have a root cause analysis and have been accurately documented. OR No non-conforming product procedure activated.	
<b>Additional notes:</b>	
Some of sub-clauses 1.6.1 – 1.6.4 may not be relevant if the applicant has not been required to instigate a non-conforming products procedure. Any previous non-conformances that the applicant has raised should not be flagged as an NC for the purpose of this audit if the applicant can demonstrate how these NCs were acted on, and safeguards put in place to reduce the risk of a similar NC occurring in the future.	

<b>1.6.1</b>	Corrective Action Plans shall identify authorised responsible personnel to handle the remedial changes required, based on their severity or risk.
<b>Full compliance:</b>	
Authorised responsible personnel shall be identified based on the risk level of the non-compliance identified.	
<b>Additional notes:</b>	
Responsible personnel need to be identified so somebody has ownership of the changes within the Corrective Action Plan.	

1.6.2	All changes shall be part of a corrective action plan to mitigate these incidents happening again in future and shall be time specified.
<b>Full compliance:</b>	
Changes are clearly stated, and time bound. They are shown to be part of a plan to ensure these incidents are mitigated against in future.	
<b>Additional notes:</b>	
Any changes will inform improvements made to the product management system (clause 1.4) and/ or non-conforming product procedure (clause 1.5) to ensure similar incidents are mitigated in future.	
1.6.3	The applicant shall notify its certification body within 24 hours of a product recall being actioned as result of this non-conforming product procedure being activated.
<b>Full compliance:</b>	
The applicant will have a procedure in its 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 that awards them the MarinTrust certificate. The time frame for informing the certification body (i.e. within 24 hours) shall be stated within this procedure.	
1.6.4	The applicant shall inform any customer affected by a non-conforming MarinTrust product immediately, and no later than 24 hours following detection.
<b>Full compliance:</b>	
Customer has been informed within 24 hours of an issue being detected.	
OR	
There has not been a nonconforming product to necessitate the implementation of the nonconforming product procedure..	
<b>Additional notes:</b>	
The customer should be notified as soon as possible so they do not inadvertently claim that the product is MarinTrust certified.	
1.7	All records relating to the execution of the non-conforming product procedure shall be retained for a period of at least 3 years.

<b>Full compliance:</b>	
The applicant will have a procedure that requires all records for non-conforming products to be kept for 3 years in its management system. The records can either be in a hard or electronic format. The auditor should take a sample of records to confirm that this procedure is being adhered to.	
<b>Additional notes:</b>	
New applicants (first certification cycle only)	
<ul style="list-style-type: none"> <li>• At the initial audit, must provide 3 months of records.</li> <li>• At each surveillance audit, must provide records for the duration of the first certification cycle, up to the date of the surveillance audit.</li> </ul>	
<b>1.8</b>	The applicant shall have a HACCP system in place to protect the integrity of products being produced within its operation.
<b>Full compliance:</b>	
The HACCP system is appropriate to the specific circumstances at the facilities under assessment (i.e. is the manufactured product for human or animal consumption?)	
<b>Additional notes:</b>	
Note that the requirements of this clause may not be required for organisations that are not undertaking any processing (e.g. traders).	
<p><b>Hazard Analysis Critical Control Point (HACCP)</b> evaluates the entire production process step by step from delivery intake to packaging and transport of the completed product. During the HACCP any stages where the product could be subject to physical, microbiological, or chemical contamination are identified. Measures are put in place for those deemed critical (i.e. temperature controls, cleaning etc.) and these are regularly monitored to ensure that the end product is safe for human consumption.</p> <p>If an applicant has third-party food safety certification, the auditor shall check the detail of the certification and verify if it includes HACCP. If it does, then this demonstrates conformity to this clause. The auditor shall note this in the audit report.</p> <p>See 'section on 'further information' on third-party food safety certification.</p>	

<b>1.8.1</b>	The applicant shall have a TACCP and VACCP system in place to protect the integrity of products being produced within its operation if intended for direct human consumption.
<b>Full compliance:</b>	
The TACCP and VACCP system is appropriate to the specific circumstances at the facilities under assessment.	
<b>Additional notes:</b>	
<p>Note that the requirements of this clause may not be required for organisations that are not undertaking any processing (e.g. traders).</p> <p><b>Threat Assessment Critical Control Point (TACCP)</b> is concerned with the prevention of deliberate and intentional food fraud. This can take the form of substitution of ingredients, passing off one foodstuff for another, false or misleading statements for economic gain that could impact public health, product tampering, fake or incorrect labelling etc.</p> <p><b>Vulnerability Assessment Critical Control Point (VACCP)</b> identifies how vulnerable various points in the supply chain are to the threat of economically motivated adulteration.</p> <p>If an applicant has third-party food safety certification, the auditor shall check the detail of the certification and verify if it includes TACCP and VACCP. If it does, then this demonstrates compliance to this clause. The auditor shall record this in the audit report.</p> <p>Some facilities will have BASC (Business Alliance for Secure Commerce) certification. However, this does not demonstrate full compliance with this clause, as it focuses only on threats i.e. TACCP. The applicant shall have a separate VACCP assessment. The auditor shall record certification to BASC and the existence of the separate VACCP assessment in the audit report.</p> <p>See ‘other schemes referred to in this standard’ section at the end of this document for further information on third-party food safety certification.</p>	

## Section 2 – Traceability and Labelling

<b>2.1</b>	MarinTrust certified marine ingredients, or the finished product, shall be labelled or otherwise identified in a manner that ensures traceability is maintained during the following key traceability steps:
<b>Full compliance:</b>	
Applicant ensures that certified marine ingredients are identifiable at all stages outlined in clauses 2.1.1 – 2.1.8 with required documentation in place.	
<b>Additional notes:</b>	
<p>Documentation received with certified products needs to clearly identify the product as certified. This may include the following:</p> <ul style="list-style-type: none"> <li>• delivery notes,</li> <li>• invoices,</li> <li>• bills of lading, or</li> <li>• official documents in an electronic format from the supplier.</li> </ul> <p>Information captured upon receipt pertaining to the batch/lot record (clause 1.3.1) must not be lost during production to ensure that full traceability can be maintained (clause 2.3). If a supplier uses an internal system (such as barcodes or product codes) to uniquely identify certified products on documents, the applicant must understand the supplier’s description to confirm the product is certified.</p> <p>Note- some production codes used in facilities may not be used on the finished product. If this is the case care must be taken to ensure that the sales invoice or a purchase order/number etc can be linked back to these production codes to ensure that full traceability can be established.</p> <p>Additionally, it is recommended that certified products are identifiable as certified on the physical product as well as on the accompanying traceability records. This can be done by placing a sign or label on the package, container, or pallet. Organisations can use a variety of methods to identify certified products, including acronyms (e.g., ‘MarinTrust’), the CoC certification code, or another internal system of identification. Where it is impossible or impractical to label physical products, the applicant will need to demonstrate how the product can be linked with associated traceability or inventory records that specify the certified status.</p>	

2.1.1	from the point of receipt,
<b>Full compliance:</b>	
MarinTrust certified marine ingredients arrive clearly labelled with appropriate documentation.	
2.1.2	during initial storage,
<b>Full compliance:</b>	
MarinTrust certified marine ingredients are clearly labelled in storage, and there is an inventory showing where those are stored.	
2.1.3	during processing,
<b>Full compliance:</b>	
During processing the batch/lot number(s) of the MarinTrust certified marine ingredients is recorded.	
2.1.4	during work in progress storage,
<b>Full compliance:</b>	
MarinTrust certified marine ingredients are clearly labelled in storage, and there is an inventory showing where they are stored.	
2.1.5	during packaging,
<b>Full compliance:</b>	
Packaging is correctly labelled/ claims are correct. Associated documentation is in place that would allow traceability of the packaged product back to supplier / source fishery.	

<b>Additional notes:</b>	
See Section 4 use of certification logo/ claim. If subcontractor also see Section 3 requirements.	

<b>2.1.6</b>	during final storage, and third-party storage
<b>Full compliance:</b>	
MarinTrust certified marine ingredients are clearly labelled in storage, and there is an inventory showing where they are stored.	
<b>Additional notes:</b>	
As 2.1.2. If subcontractor also see Section 3 requirements.	

<b>2.1.7</b>	during final dispatch, handling
<b>Full compliance:</b>	
<b>Full compliance:</b> Invoice for product contains batch/lot codes to allow buyer of the MarinTrust certified marine ingredients to traceback to supplier/ source fishery if required.	
<b>Additional Notes:</b>	
If subcontractor also see Section 3 requirements.	

<b>2.1.8</b>	during delivery to the customer
<b>Full compliance:</b>	
Upon delivery, buyer receives copy of a delivery note (or invoice) stating batch/lot codes of MarinTrust certified marine ingredients.	
<b>Additional notes:</b>	
If subcontractor also see Section 3 requirements.	

<b>2.2</b>	The applicant shall have documented evidence that MarinTrust certified marine ingredients and finished products are segregated from non-certified product by either: <ul style="list-style-type: none"> <li>• physical separation, or</li> <li>• temporal separation,</li> </ul> during the following key traceability stages (2.2.1 to 2.2.8):
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<b>Full compliance:</b>	
Throughout the production process MarinTrust approved materials and the MarinTrust certified marine ingredients are kept physically or temporally segregated from non-certified products, and the facility can provide evidence of this.	

<b>2.2.1</b>	from the point of receipt,
<b>Full compliance:</b>	
MarinTrust certified marine ingredients are delivered separately/ clearly segregated from non-certified marine ingredients	
<b>Additional notes:</b>	
In case of fishmeal or fish oil in bulk, although there are dedicated lines for discharge or a procedure to separate them temporally there shall be a process to prevent unintentional mixing	

<b>2.2.2</b>	during initial storage,
<b>Full compliance:</b>	
MarinTrust certified marine ingredients are kept separate from non-certified materials in storage.	

<b>2.2.3</b>	during processing,
<b>Full compliance:</b>	
A separate processing line is used for MarinTrust certified marine ingredients. OR Processing of MarinTrust certified marine ingredients and non-certified materials is temporally segregated.	

<b>2.2.4</b>	during work in progress storage,
<b>Full compliance:</b>	
MarinTrust certified marine ingredients are kept segregated from non-certified materials in storage.	

<b>2.2.5</b>	during packaging,
<b>Full compliance:</b>	
MarinTrust certified marine ingredients are packed separately from non-certified products.	
<b>Additional notes:</b>	
See Section 4 use of certification logo/ claim. If the company is a subcontractor also see Section 3 requirements.	

<b>2.2.6</b>	during final storage and third-party storage,
<b>Full compliance:</b>	
MarinTrust certified marine ingredients are kept segregated from non-certified materials in storage.	
<b>Additional notes:</b>	
If the company is a subcontractor see also Section 3 requirements. If not, in case of marine ingredients in bulk, although there are dedicated lines for discharge or a procedure to separate them temporally or physically, there shall be a process to prevent any unintentional mixing of non-certified with certified MarinTrust marine ingredients	

<b>2.2.7</b>	during final dispatch, handling
<b>Full compliance:</b>	
MarinTrust certified marine ingredients ready for final dispatch are kept segregated from non-certified marine ingredients	
<b>Additional Notes:</b>	
If this is undertaken by a subcontractor see also Section 3 requirements.	

<b>2.2.8</b>	during delivery to customer
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<b>Full compliance:</b>	
During delivery MarinTrust certified marine ingredients are kept segregated from non-certified marine ingredients.	
<b>Additional notes:</b>	
Where this is undertaken by a subcontractor see also Section 3 requirements.	

<b>2.3</b>	The applicant shall maintain accurate records of the quantities/volumes of MarinTrust certified marine ingredients, and the finished product bought and sold (or received and dispatched) which consider production practices that could affect the final quantity or volume calculations using a mass balance exercise.
<b>Full compliance:</b>	
The applicant maintains accurate up-to-date records of quantities/ volumes of fishmeal/ fish oil /finished product bought and sold across its entire product range.	
<b>Additional notes:</b>	
To obtain the percentage of MarinTrust certified marine ingredient inputs used in the applicant’s operation, calculate the annual sum of certified MarinTrust marine ingredients inputs divided by total annual sum of all marine ingredient materials used. This shall need to be reported to MarinTrust so that the percentage of MarinTrust certified marine ingredients sold in the final product cannot be exceeded, therefore mitigating against potential fraud through duplication or substitution.	
New applicants (first certification cycle only)	
<ul style="list-style-type: none"> <li>• At the initial audit, must provide 3 months of records.</li> <li>• At each surveillance audit, must provide records for the duration of the first certification cycle, up to the date of the surveillance audit.</li> </ul>	

<b>2.4</b>	The applicant shall report on input quantities and finished product quantities used on an annual basis to MarinTrust.
<b>Full compliance:</b>	
There is evidence the MarinTrust template / form has been submitted within the past 12 months. OR For a new applicant / initial audit, the completed template / form is submitted as part of the audit.	

<b>Additional notes:</b>	
The intent of this clause is for MarinTrust to understand the facility's inputs and outputs, to confirm that the percentage of MarinTrust certified marine ingredients included in the final product does not exceed the quantities supplied as raw materials.	
MarinTrust provide a <u>template / form</u> for the facility to complete. This shall be completed in full as a minimum every 12 months. This information includes details of:	
<ul style="list-style-type: none"> <li>• quantities of input marine ingredients, by type.</li> <li>• quantities of output finished products, by type.</li> <li>• for each of the above, the quantity that is MarinTrust certified or Improver Programme accepted.</li> </ul>	
<p>'Input quantities' refer to any marine ingredients sourced, handled, managed, or controlled, which includes fishmeal, fish oil, protein hydrolysates etc. 'Output finished products' mean any products derived from the marine ingredients which are sourced or handled. These can include the marine ingredients themselves, refined oil, feed etc.</p>	
For a new / initial certification audit, the facility shall submit the completed template / form, however this will include a zero content of MarinTrust certified ingredients or products. If a facility has not completed the template at the time of the audit, it will be rated as a major non-conformity. In accordance with MarinTrust audit procedures, the facility will have 30 calendar days to submit a completed template.	

<b>2.5</b>	The applicant shall conduct a documented check of its product management system across the entire range of MarinTrust certified marine ingredients or finished product by batch/lot number or volume produced.
<b>Full compliance:</b>	
Following the Traceability Check, complete traceability can be demonstrated following batch/lot numbers for the entire range of MarinTrust approved raw materials and certified marine ingredients . For the mass balance exercise the volume / weight of MarinTrust certified finished products does not exceed the volume / weight of MarinTrust approved raw materials.	
<b>Additional notes:</b>	
The applicant can display the findings from the traceability test in the Traceability Check Template, or a similar document they already use in its own management system.	

In compliance with Clause 2.3, applicants must complete a mass balance exercise.

The mass balance exercise is particularly important if the facility processes or handles non-certified marine ingredients that are similar in nature to certified marine ingredients. This is to provide assurance that the volume / weight of marine ingredients in MarinTrust certified finished products does not exceed the volume / weight of MarinTrust approved input materials

New applicants must have at least one batch that has been supplied to a customer.

<b>2.5.1</b>	This traceability check shall be carried out at least once per year with a gap no greater than 12 months between checks, and shall include a traceability challenge both from receipt to despatch and from despatch back to receipt
<b>Full compliance:</b>	
The applicant can demonstrate that the traceability check has been carried out at least once per year, and that a trace forward (receipt to dispatch) and trace backwards (dispatch to receipt) traceability check has been carried out for the full range of MarinTrust certified products.	
<b>Additional notes:</b>	
MarinTrust certified products from suppliers can be traced forward to final dispatch of the finished product.	
MarinTrust certified products in certified finished products must also be able to be traced back to supplier and source fishery. Note that production may use a range of different sources of MarinTrust certified materials, as such several suppliers and source fisheries would be identified.	

<b>2.6</b>	Any Corrective Action Plans resulting from non-conformities raised during this traceability check of the product management system shall be accurately documented:
<b>Full compliance:</b>	
Non-conformities and corrective action plans are fully documented by the applicant in the template in the Non-Compliance tab in the supplementary spreadsheet entitled <i>Traceability check – guidance and templates</i> which is available from the MarinTrust website	
OR	
No non-conformities were raised during the applicant’s check.	
<b>Additional notes:</b>	

It will be responsibility of the applicant to ensure that non-conformities from the traceability check will be corrected. The intent here is to enable the applicant to routinely check its product management system and make improvements if necessary. This is considered industry good practice.

Note that applicants will not receive any NC from the auditor for identifying non-conformities during the traceability check if they can demonstrate that NCs raised during the traceability check have been corrected. This will encourage the applicant to be transparent. If no non-conformities were raised by the applicant and the auditor has verified that a comprehensive traceability check has been carried out, this clause and sub-clauses 2.6.1 – 2.6.2 will not be relevant.

<b>2.6.1</b>	Corrective Action Plans shall identify authorised responsible personnel to handle the changes required
<b>Full compliance:</b>	
Authorised responsible personnel are identified to handle any changes. OR No non-conformities were raised during the applicant’s traceability check.	
<b>Additional notes:</b>	
Responsible personnel need to be identified so somebody has ownership of the changes.	

<b>2.6.2</b>	All changes shall be part of Corrective Action plan to mitigate these incidents happening again in future and shall be time specified.
<b>Full compliance:</b>	
Changes are clearly stated, time bound and part of a plan to mitigate these incidents happening again in the future. OR No non-conformities were raised during the applicant’s traceability check.	
<b>Additional notes:</b>	
This should also inform improvements to the non-conforming products procedure (see clauses 1.5 and 1.6) to mitigate the risk of similar non-conformities being raised in the future.	

2.7	Where processing or packing/repacking occurs, records shall allow conversion rates for the finished product outputs from MarinTrust certified marine ingredients inputs over any given batch or time period to be calculated.
<b>Full compliance:</b>	
Records of quantities/ volumes of input materials and processed or packaged products are comprehensive to allow conversion rates for the finished product outputs to be calculated. The percentage of MarinTrust certified material in the final product cannot exceed that of the input materials.	
<b>Additional notes:</b>	
For guidance on calculating conversion rates please refer to the mass balance tab in supplementary spreadsheet entitled <i>Traceability check– guidance and templates</i> . Available from the MarinTrust website.	
2.7.1	Conversion rates for processing of the finished product that has used MarinTrust certified marine ingredients shall be justifiable, and verifiable
<b>Full compliance:</b>	
Conversion rates have been properly calculated and are verifiable and justifiable.	
2.8	The applicant shall conduct an annual internal monitoring audit of all MarinTrust processes including a documented product recall test, or after a traceability-based complaint or incident, to ensure that the non-conforming product procedure as stated in 1.5 is functioning correctly and effectively.
<b>Full compliance:</b>	
<p>The applicant can evidence that an internal monitoring audit and documented product recall test has been carried out annually as a minimum. Where a traceability related complaint or incident has been received by the facility in the 12-month period, the internal monitoring audit and documented product recall test shall be completed afterwards. In this situation, a separate internal monitoring audit and recall test is not required for that 12-month period.</p> <p>Internal monitoring audits and product recall tests shall demonstrate that the procedure is functioning correctly and would be effective should it have to be used. Any failings have been identified and rectified.</p>	
2.9	All traceability and identification records shall be kept for the shelf life of the product, or a minimum of 3 years, whichever is longer.

<b>Full compliance:</b>	
Full compliance: All traceability and identification records have been kept for a minimum of 3 years.	
<b>Additional notes:</b>	
New applicants (first certification cycle only)	
<ul style="list-style-type: none"> <li>• At the initial audit, must provide 3 months of records.</li> <li>• At each surveillance audit, must provide records for the duration of the first certification cycle, up to the date of the surveillance audit.</li> </ul>	
<b>2.9.1</b>	All records used to provide evidence of compliance to this MarinTrust CoC Standard shall be accurate, legible, and unadulterated.
<b>Full compliance:</b>	
All records are accurate, legible, and unadulterated.	
<b>2.10</b>	The applicant shall co-operate with the certification body and/or MarinTrust CoC Standard holder if they are asked to participate in an MarinTrust product integrity investigation by the supplying of documentary evidence within 5 days of a request for information.
<b>Full compliance:</b>	
The applicant fully cooperates with the certification body and/or MarinTrust should the need arise for a product integrity investigation. Documentary evidence shall be supplied within a period of 5 calendar days from the receipt of a request for information.	
<b>Additional notes:</b>	
There should be a written agreement in place between the applicant and certification body as part of the certification contract.	

## Section 3 – Subcontractors

Clauses in Section 3 are not applicable if the facility does not use subcontractors or the services of third-party transport companies.

<b>3.1</b>	Where the applicant utilises the services of a subcontractor (carrying out contract storage, processing, packing, labelling), the subcontractor shall be audited by the applicant’s certification body and shall be compliant with the requirements of the MarinTrust CoC Standard.
<b>Full compliance:</b>	
The applicant can demonstrate that subcontractor(s) facilities have been audited as part of the applicant’s certification to the MarinTrust CoC Standard, and the subcontractor’s facilities are compliant with the standard.	
<b>Additional Notes:</b>	
If subcontractors are used, they will be part of the applicant’s certification to this standard. Prior to the audit of the applicant’s facilities the applicant should have requested any subcontractor(s) to be part of the audit plan and to be assessed for compliance against the MarinTrust CoC Standard. CoC audits for subcontractor facilities shall be co-ordinated by the certification body. This is to ensure that the subcontracting facility has been audited and found to be compliant with the standard prior to the audit of the applicant’s facilities.	
In the case of a trader that buys fishmeal or fish oil from a MarinTrust certified facility,	
<ul style="list-style-type: none"> <li>a) the purchased fishmeal or fish oil is kept at the storage facility of the certified plant or at a storage that has MarinTrust CoC. Only paperwork is required to prove that the volume reconciliation of certified MarinTrust material is accurate, or</li> <li>b) if the purchased fishmeal or fish oil is kept in another storage facility that is not MarinTrust certified, this separate facility will need to be audited to ensure that the MarinTrust certified marine ingredients are not being mixed with non-certified MarinTrust marine ingredients.</li> </ul>	
<b>3.2</b>	The applicant shall maintain an up-to-date record of the names and addresses of all approved subcontractors handling MarinTrust certified marine ingredients and the identity of the certified finished products.
<b>Full compliance:</b>	

The applicant maintains an up-to-date record of the names and address of all approved subcontractors handling MarinTrust certified marine ingredients and the identity of the finished products.

**Additional notes:**

This is good practice; a record will help the applicant manage its subcontractors and keep track of where MarinTrust certified products are supplied.

**3.3** If third-party storage facilities are used, the applicant shall have the ability to request the MarinTrust certified marine ingredients and the certified finished products records from subcontractor storage facilities to allow for verification at any point in time.

**Full compliance:**

The applicant can provide evidence (such as that stated in a contract/ memorandum of understanding) that the subcontractor will provide records of MarinTrust certified materials and certified finished products should the applicant require.

**Additional notes:**

This would be included in the applicant’s product management system to ensure any potential risks around using subcontractors are fully considered in case of a non-conforming product procedure.

**3.4** The applicant shall have a signed agreement with all subcontractors handling the MarinTrust certified marine ingredients and the certified finished products.

**Full compliance:**

The applicant has a signed agreement in place with all subcontractors that handle MarinTrust certified marine ingredients.

**Additional Notes:**

The purpose of this agreement is to ensure that the subcontractor is clear that its operations must fully align with the MarinTrust CoC Standard when they are handling MarinTrust certified products.

**3.4.1** This agreement shall ensure that the subcontractor has documented systems in place to ensure full traceability, segregation, and identification of the MarinTrust certified marine ingredients and the certified finished products at every stage of handling in compliance with this MarinTrust CoC Standard.

<b>Full compliance:</b>	
The agreement specifies that the subcontractor has documented systems in place to ensure full traceability, segregation, and identification of the MarinTrust certified marine ingredients and the certified finished products. Every stage of handling is stated to be compliant with the MarinTrust CoC Standard.	

<b>3.5</b>	Where an applicant utilises the services of third-party transport companies, an agreement or equivalent documentary evidence shall be in place demonstrating that MarinTrust certified product integrity is ensured during transportation.
<b>Full compliance:</b>	
An agreement (or equivalent documentary evidence) is in place that specifies that the transport company keeps MarinTrust certified product separated and clearly identifiable from non-certified materials. The agreement specifies 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.	

<b>3.5.1</b>	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 certified marine ingredients materials due to the composition of a previous cargo.
<b>Full compliance:</b>	
In the agreement it is specified that the applicant has the right to refuse transportation should this adversely affect the safety and/ or integrity of the MarinTrust certified marine ingredients. The third-party contractor will also agree to keep the condition of transport containers clean and free from contaminants.	
<b>Additional notes:</b>	
Due to possible risks of the composition of a previous cargo or through poor loading practices or through deliberate mistakes, it is considered good practice if additional sampling at origin and destiny is done to assure that no adulteration has been made during transport, especially with product in bulk fish oil.	



## Section 4 – Use of the MarinTrust Certification Logo or Claim

<b>4.1</b>	The applicant shall only use the MarinTrust CoC certification logo or claim if it has valid certification to this MarinTrust CoC Standard.
<b>Full compliance:</b>	
The applicant has received certification and is now eligible to use the MarinTrust logo / make claim after receiving permission from MarinTrust to do so. If this is the initial audit the applicant has not used the MarinTrust logo/ claim on any products, and they are aware they cannot do so until they are formally certified and received permission from MarinTrust to use the logo (see requirements for clause 4.1.1).	
<b>Additional notes:</b>	
<p>If this is first time that the applicant has applied for MarinTrust CoC certification, the MarinTrust CoC certification logo or claim can only be used on MarinTrust certified marine ingredients following the applicant receiving a valid certificate to this MarinTrust CoC Standard and receiving permission from MarinTrust to do so (clause 4.1.1).</p> <p>If this is a surveillance audit and the facility already has a valid certificate it can continue to use the MarinTrust CoC logo and make claims so long as any non-conformities are dealt within the time limit agreed by the certification body. This shall be no longer than 30 calendar days.</p> <p>Should an applicant cease to be certified or have its certification suspended, whether through a failure to renew the certification or a failure to meet the requirements of the MarinTrust CoC Standard, the applicant and the resulting products must no longer use the logo or claim to be MarinTrust certified.</p> <p>The MarinTrust logo should be used only in connection with marine ingredients from certified facilities identified in the list of certified facilities in the MarinTrust website <a href="http://www.MarinTrust.com">www.MarinTrust.com</a>. The MarinTrust Chain of Custody logo should be used only in connection with the marine ingredients from certified plants expressly identified in the Chain of Custody certificate issued to Licensee.</p> <p>MarinTrust facility and MarinTrust CoC certified fish may claim certification against the respective standard and use the MarinTrust logo. The statement “this product is MarinTrust certified” can only be used if the marine ingredient facility <u>and</u> all the raw material meet both the factory and this CoC standard.</p>	

<b>4.1.1</b>	The applicant shall only use the certification logo or claim if it has documented evidence demonstrating that it has been granted approval to do so by MarinTrust, the standard owner.
<b>Full compliance:</b>	
The applicant can provide documented evidence that they have received approval from MarinTrust to use the certification logo or claim.	
If this is the first time the applicant has applied for MarinTrust CoC certification the applicant has not used the MarinTrust logo / claim on any products, and they are aware they cannot do so until they have received approval from MarinTrust.	
<b>Additional notes:</b>	
The applicant shall provide its MarinTrust certificate number with the completed Terms and Conditions of Use. The applicant must allow MarinTrust Secretariat a reasonable time to review and approve in advance all of the MarinTrust logo on print and digital materials and packing (such as advertisements, packaging, web pages, collateral materials, point of sale materials, and video footage).	

<b>4.2</b>	The applicant shall follow the current MarinTrust logo guidelines for any logo used on its products and shall be verifiable.
<b>Full compliance:</b>	
The applicant is fully compliant with the MarinTrust logo rules.	
<b>Additional notes:</b>	
According to the MarinTrust Programme’s Logo Rules and Guidelines, the applicant must allow MarinTrust time to review and approve in advance all the MarinTrust logo on print and digital materials and packing (such as advertisements, packaging, web pages, collateral materials, point of sale materials, and video footage).	
Where the logo is intended to be placed on products and before the logo is used, samples of designs should be sent to MarinTrust for approval via email to <a href="mailto:standards@marin-trust.com">standards@marin-trust.com</a> . This should take no longer than 5-10 working days provided the logo rules and guidance have been followed accurately. To find out more about the logo rules and guidelines, please download the document from the downloads section of the MarinTrust website.	
Information on the MarinTrust logo rules can be found at <a href="https://www.marin-trust.com/marintrust-brand/guidelines/guidelines-certified-facilities">https://www.marin-trust.com/marintrust-brand/guidelines/guidelines-certified-facilities</a> Auditors shall check that where the logo is used that it meets with these logo rule requirements	

<b>4.3</b>	The applicant shall operate a secure system for the production, storage and application of product labels bearing the MarinTrust CoC logo / claim to ensure that only certified marine ingredients are labelled as such.
<b>Full compliance:</b>	
The applicant will have a documented product management system (see clauses 1.4 – 1.6) and effective traceability (see Section 2) to ensure that the MarinTrust CoC logo/claim is only used on certified finished products. The production, storage, and application of product labels is secure and clearly managed.	
<b>Additional notes:</b>	
This is to mitigate any risk of labelling of products by unauthorised personnel.	

## Section 5 – Staff Training and Key Representative Responsibilities

<b>5.1</b>	The applicant shall put in place documented programmes covering the training needs of all key staff critical to the successful adoption of this MarinTrust CoC Standard.
<b>Full compliance:</b>	
There is a documented training programme, and the applicant is able to demonstrate how this covers the training needs of all staff who are critical to the successful adoption of the MarinTrust CoC Standard.	
<b>Additional notes:</b>	
Key staff that are critical to the successful adoption of this MarinTrust CoC Standard should be identified well in advance of the application, so as to ensure that adequate training can be provided to increase the likelihood of a successful audit.	
<b>5.1.1</b>	These documented training programmes shall include, as a minimum, identifying the staff training needs and the provision of training, to ensure that the staff have the necessary competencies to meet the requirements of this standard.
<b>Full compliance:</b>	
A training programme is fully documented; all key staff have been identified along with training needs. The provision of training to staff has also been documented to demonstrate that staff are competent to meet the requirements of the MarinTrust CoC Standard.	
<b>5.1.2</b>	The applicant shall review the effectiveness of all training provision on an annual basis.
<b>Full compliance:</b>	
The applicant can demonstrate that they review the training programme on an annual basis and make improvements if necessary.	
<b>Additional notes:</b>	
This will be particularly important if there is a high turnover of staff in the organisation.	

5.2	The applicant shall identify and appoint an individual (who also acts as the main contact for MarinTrust) who shall be responsible for all contact with the certification body and for responding to any requests for documentation or information related to CoC conformity.
<b>Full compliance:</b>	
The applicant has identified and appointed an individual who shall be responsible for all contact with the certification body.	
<b>Additional notes:</b>	
This individual could be the same person in charge of the HACCP team, but it will be up to the applicant to decide who has overall responsibility for contact with the certification body. The person in charge should have the authority to make changes to the processes and procedures and can give assurance that this standard is implemented effectively through all parts of the applicant's operations.	
5.3	The applicant's CoC key representative shall oversee the training provision review of the competencies of its staff, at least annually or after an incident.
<b>Full compliance:</b>	
The applicant's CoC key representative can demonstrate that they oversee the training provision review of the competencies of key staff at least annually or after an incident.	
<b>Additional notes:</b>	
Training may be in the form of formal workshops, refresher training or coaching, mentoring or on-the-job experience.	
5.3.1	Where additional training provision is required the applicant shall provide and conduct the relevant training in a time specified manner.
<b>Full compliance:</b>	
Additional training is provided in a timely manner.	
<b>Additional notes:</b>	
This is to ensure that the applicant has a plan with a timeframe to ensure it is completed before the next audit.	
5.4	Records of all training provision completed and planned shall be maintained and be accessible.

<b>Full compliance:</b>	
Documents recording training provision completed and planned are maintained and accessible.	

<b>5.4.1</b>	An employee training record shall include as a minimum: <ul style="list-style-type: none"> <li>• the name of the trainee and signed confirmation of attendance;</li> <li>• the date of the training;</li> <li>• the title or course contents, as appropriate;</li> <li>• the training provider.</li> </ul>
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<b>Full compliance:</b>	
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<b>Full compliance:</b> Training records provide the necessary details.	
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<b>Additional notes:</b>	
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The trainer/training provider is the individual appointed by the applicant that has an effective understanding of the marine ingredients processing activities and the current version of the MarinTrust Chain of Custody Standard.	
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<b>5.5.</b>	The applicant shall inform its certification body within 10 working days if it changes its key representative member of staff and how it plans to induct a new member of staff to take over the role.
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<b>Full compliance:</b>	
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If there has been a staff change, the applicant informed the certification body within 10 working days.	
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## Section 6 – Specific Requirements for Marine Ingredients sourced from a fishery that has been accepted into the MarinTrust Improver Programme

This section is only applicable if the applicant is handling a marine ingredient that is made from a raw material source from an accepted MarinTrust Improver Programme fishery. Details of all fisheries that are included within this Improver Programme can be located on the MarinTrust website.

<b>6.1</b>	The applicant shall be able to use marine ingredients from an Improver Programme if the following conditions apply: <ul style="list-style-type: none"> <li>the Improver Programme is recognised by MarinTrust, and</li> <li>the facility also uses marine ingredients that have been certified to the MarinTrust Factory Standard.</li> </ul>
<b>Full compliance:</b>	
The applicant facility has a policy in place and documented evidence to prove that Improver Programme products are only sourced from a fishery within the Improver Programme and that they also use marine ingredients that are fully certified to the MarinTrust standard.	
<b>Additional notes:</b>	
The sourcing of the MarinTrust certified product must be active during the whole time of certification and should be sourced every 12 months as a minimum. This ensures that applicants meet the ethical requirements of the programme, including where the availability of MarinTrust certified product is limited.	
<b>6.2</b>	The applicant handling marine ingredients from a MarinTrust Improver Programme, shall comply with the following:
<b>6.2.1</b>	Marine ingredients coming from the MarinTrust Improver Programme shall be clearly identified from all marine ingredients from fully certified MarinTrust products or non-certified products.
<b>6.2.2</b>	Marine ingredients coming from the MarinTrust Improver Programme shall be clearly segregated, both during processing and during storage, from all certified MarinTrust and non-certified products.
<b>Full compliance:</b>	

The applicant has a system in place that can effectively identify and segregate this type of marine ingredient from a fully certified MarinTrust marine ingredient or a non-certified product.

<b>6.3</b>	The applicant shall have a traceability system in place that will allow them to demonstrate the traceability back to the accepted Improver Programme fishery and accepted MarinTrust facility that is handling the Improver Programme fishery material.
<b>Full compliance:</b>	
The applicant has a system in place that can effectively trace this type of marine ingredient back to an accepted Improver Programme fishery and accepted MarinTrust facility.	

<b>6.4</b>	The applicant shall not use any logo from the MarinTrust programme on any product that contains <u>any</u> marine ingredients produced from the MarinTrust Improver Programme fishery.
<b>Full compliance:</b>	
The products produced in the facility are correctly labelled and the MarinTrust logo is only used on products that can trace back to marine ingredients that are fully certified to the programme. If products contain MarinTrust Improver Programme material, the MarinTrust Logo cannot be used on these products. However, if the material is made solely of MarinTrust improver material then a claim to this MarinTrust Improver Programme can be made as long as the facility gets prior approval by the MarinTrust Secretariat.	
<b>Additional notes:</b>	
If an applicant has fully certified MarinTrust material and it is mixed with material from an approved Improver Programme, all the resulting products will become Improver Programme accepted. Fully approved material that is subsequently mixed with any non-certified or Improver Programme material must <u>not</u> use the MarinTrust logo.	

## Other schemes referred to in this standard

**Third-party certification schemes:** Voluntary schemes which verify, through regular independent assessments, that facilities are meeting stated standards. A number of such schemes exist including:

- GMP+ Feed Certification.
- Programa de Aseguramiento de Calidad (PAC).
- Feed Materials Assurance Scheme (FEMAS).
- ISO 22000 Food Safety Management.
- Food Safety System Certification 22000 (FSSC22000).
- BRC Global Standard.
- ISO 9001.

The above list is not exhaustive. Contact MarinTrust if the third-party scheme is not listed.

**National regulatory approval of HACCP:** For the purposes of this Standard, national regulatory authority approval of HACCP is considered the same as third-party certification.

**Business Alliance for Secure Commerce (BASC):** is an international business alliance that promotes safe trade in cooperation with governments and international organisations. It provides a framework for safer trade and risk management. Details of certified companies are on the BASC website: [https://sibasc.wbasco.org/mod\\_consulta\\_pag\\_wbo/consulta\\_empresas\\_certificadas.php](https://sibasc.wbasco.org/mod_consulta_pag_wbo/consulta_empresas_certificadas.php)

**Global Seafood Traceability Dialogue (GDST):** The GDST is an international, business-to-business platform established in 2017 to create global industry standards for seafood traceability.

KDEs in this CoC Standard are defined in the MarinTrust 'Definitions and Key terms' document available on the MarinTrust website.

**Important note:** Reference to the above mentioned schemes is provided for contextual and informational purposes only and does not constitute a requirement for certification under the MarinTrust Programme, nor does it introduce additional normative requirements beyond those defined in the MarinTrust Standard.