



Responsible Supply of Marine Ingredients

Chain of Custody Standard Version 2.1

*A tool for voluntary use in markets for
products of marine ingredients*

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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 programme¹, 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 Logo².

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.

¹ The official language of this standard is English. The definitive version is maintained at www.marin-trust.com. Any discrepancy between copies, versions or translations shall be resolved by reference to the definitive English version.

² Further Information regarding application, rules and regulations can be found on the MarinTrust website www.marin-trust.com or by contacting Standard Owner at 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 Factory'.

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 referred to in this standard'	New section to provide information on other schemes referred to in this standard. Revision to the list of schemes included.

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 site.

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:

- Storage provider
- Primary processor
- Secondary processor
- 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

1.1

1.1 The applicant shall have a documented and signed policy that states that it is committed to achieving and adhering to the requirements of this MarinTrust Chain of Custody (CoC) Standard.

1.1.1 The applicant shall have a process to ensure that this policy is communicated to all staff within the site.

1.2

1.2 The applicant shall have a documented and effective supplier approval and monitoring system 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.

1.2.1 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:

1.2.1.1 The applicant shall have documents/evidence provided from these suppliers in place, to prove the identity of the marine ingredients back to an approved fishery or by-product.

1.2.1.2 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 materials and shall sign a form stating their commitment to the MarinTrust CoC standard.

1.2.1.3 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 materials by an approved consultant or trainer to the MarinTrust programme.

1.3

1.3 A batch/lot record of all MarinTrust certified marine ingredients shall be fully maintained.

1.3.1 The batch/lot record shall contain the following information:

- supplier name.
- supplier unique MarinTrust certificate number.
- volume of MarinTrust certified marine ingredients received from each supplier.

1.3.1.1 The batch/lot record shall contain the following information:

- Key Data Element (KDE) information on the source fishery for whole fish to include:
 - name of vessel, registration details of the vessel, flag state of the vessel.
 - species including common and Latin name.
 - catch area.
 - date of discharge from the vessel.
- Key Data Element (KDE) information on by-product raw materials, to include:
 - the name of the supplier of by-products used in the marine ingredients.

- 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.
- date of production and/or date of dispatch from the by-product supplier.

1.4

1.4 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.

1.5

1.5 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.

1.6

1.6 Any Corrective Action Plans resulting from a non-conforming products procedure shall be accurately documented and shall include a root cause analysis.

- 1.6.1** Corrective Action Plans shall identify authorised responsible personnel to handle the remedial changes required, based on their severity or risk.
- 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.
- 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.
- 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.

1.7

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.

1.8

1.8 The applicant shall have a HACCP system in place to protect the integrity of products being produced within its operation.

- 1.8.1** 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.

Section 2 – Traceability and Labelling

2.1

2.1 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:

- 2.1.1** from the point of receipt,
- 2.1.2** during initial storage,
- 2.1.3** during processing,
- 2.1.4** during work in progress storage,
- 2.1.5** during packaging,
- 2.1.6** during final storage, and third-party storage
- 2.1.7** during final dispatch, handling
- 2.1.8** during delivery to the customer

2.2

2.2 The applicant shall have documented evidence that MarinTrust certified marine ingredients and finished products are segregated from non-certified product by either:

- physical separation, or
- temporal separation,

during the following key traceability stages (2.2.1 to 2.2.8):

- 2.2.1** from the point of receipt,
- 2.2.2** during initial storage,
- 2.2.3** during processing,
- 2.2.4** during work in progress storage,
- 2.2.5** during packaging,
- 2.2.6** during final storage and third-party storage,
- 2.2.7** during final dispatch, handling
- 2.2.8** during delivery to customer

2.3

2.3 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.

2.4

2.4 The applicant shall report on input quantities and finished product quantities used on an annual basis to MarinTrust.

2.5

2.5 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.

2.5.1 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

2.6

2.6 Any Corrective Action Plans resulting from non-conformities raised during this traceability check of the product management system shall be accurately documented:

2.6.1 Corrective Action Plans shall identify authorised responsible personnel to handle the changes required

2.6.2 All changes shall be part of Corrective Action plan to mitigate these incidents happening again in future and shall be time specified.

2.7

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.

2.7.1 Conversion rates for processing of the finished product that has used MarinTrust certified marine ingredients shall be justifiable, and verifiable

2.8

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.

2.9

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.

2.9.1 All records used to provide evidence of compliance to this MarinTrust CoC Standard shall be accurate, legible, and unadulterated.

2.10

2.10 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.

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.

3.1

3.1 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.

3.2

3.2 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.

3.3

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.

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

3.5

3.5 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.

3.5.1 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.

Section 4 – Use of the MarinTrust Certification Logo or Claim

4.1

4.1 The applicant shall only use the MarinTrust CoC certification logo or claim if it has valid certification to this MarinTrust CoC Standard.

4.1.1 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.

4.2

4.2 The applicant shall follow the current MarinTrust logo guidelines for any logo used on its products and shall be verifiable.

4.3

4.3 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.

Section 5 – Staff Training and Key Representative Responsibilities

5.1

5.1 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.

5.1.1 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.

5.1.2 The applicant shall review the effectiveness of all training provision on an annual basis.

5.2

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.

5.3

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.

5.3.1 Where additional training provision is required the applicant shall provide and conduct the relevant training in a time specified manner.

5.4

5.4 Records of all training provision completed and planned shall be maintained and be accessible.

5.4.1 An employee training record shall include as a minimum:

- the name of the trainee and signed confirmation of attendance;
- the date of the training;
- the title or course contents, as appropriate;
- the training provider.

5.5

5.5 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.

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.

6.1

6.1 The applicant shall be able to use marine ingredients from an Improver Programme if the following conditions apply:

- the Improver Programme is recognised by MarinTrust, and
- the facility also uses marine ingredients that have been certified to the MarinTrust Factory Standard.

6.2

6.2 The applicant handling marine ingredients from a MarinTrust Improver Programme, shall comply with the following:

6.2.1 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.

6.2.2 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.

6.3

6.3 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 factory that is handling the Improver Programme fishery material.

6.4

6.4 The applicant shall not use any logo from the MarinTrust programme on any product that contains any marine ingredients produced from the MarinTrust Improver Programme fishery.

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

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.