

# Guidance for data reporting – Clause 2.4 during transition of MarinTrust Chain of Custody Standard V2.1

## Purpose of this document

This document outlines guidance for new applicants and current certificate holders to comply with data reporting requirements associated with clause 2.4 of the MarinTrust Chain of Custody Standard during the transition period from Version 2 to Version 2.1.

## How to ensure compliance during the transition phase

A data reporting request for Q1 2026 data was issued in April 2026 to all current certificate holders. All certificate holders are required to complete and submit this form upon receipt of the request.

Following this request, no further data reporting requests will be issued in 2026.

The next data reporting request will be issued in January 2027 and will cover data for the 2026 reporting period (1<sup>st</sup> January–31<sup>st</sup> December 2026). All certificate holders will be required to complete and submit the form upon receipt of this request.

This approach is intended to reduce duplication of data reporting during the transition from MarinTrust Chain of Custody Standard Version 2 to Version 2.1.

For further detailed information on how to ensure compliance during the transition phase, please refer to the guidance below relevant to your certification cycle stage and applicable version of the Standard:

- [Current certificate holder due recertification remaining under Version 2](#)
- [New applicants undergoing audits against Version 2](#)
- [Current certification holder due recertification transitioning to Version 2.1](#)
- [Current certificate holder due surveillance transitioning to Version 2.1](#)
- [New applicants undergoing audits against Version 2.1](#)

A decision flow is also included in [Appendix 1](#) to help determine the requirements applicable to your specific situation:

**Note:** *Certificate holders due surveillance audits scheduled on or after 1<sup>st</sup> May 2026 must be audited against Version 2.1 of the Chain of Custody Standard. Audits against Version 2 will no longer be permitted for surveillance audits from this date. Please refer to guidance for [current certificate holder due surveillance transitioning to Version 2.1](#)*

## Version 2 – Current certificate holders

### Recertification

Current certificate holders due for recertification who submitted their recertification applications before 1<sup>st</sup> May 2026, and who did not opt to transition to Version 2.1 for their upcoming audit, are required to report input quantities and finished product quantities quarterly in accordance with Clause 2.4 of the Chain of Custody Standard Version 2.

Certificate holders undergoing recertification against Version 2 can demonstrate compliance by having submitted data for the following reporting requests:

- Q2 2025 (issued July 2025)
- Q3 2025 (issued October 2025)
- Q4 2025 (issued January 2026)
- Q1 2026 (issued April 2026)

Whilst this clause was derogated under Version 2, certificate holders due for recertification are expected to demonstrate full compliance by submitting the required data when requested. Auditors will assess compliance in the context of the facility's audit history, including verification of continued progress towards full compliance with clause 2.4 throughout the certification cycle in line with interpretation guidance.

***Important note:** Where a recertification audit is conducted against Version 2, the subsequent annual surveillance audit must be conducted against Version 2.1.*

**Example:** Your recertification audit due date is in June, so you will have submitted your recertification application form in January against Version 2. Where you did not opt to transition to V2.1 for this audit, you are required to report on input quantities and finished product quantities quarterly in accordance with clause 2.4. of Chain of Custody Standard Version 2.

In this case, you will need to demonstrate the submission of data reporting for Q1 2026, and Q4, Q3 and Q2 of 2025.

## Version 2 – New applicants

New applicants who submitted applications for Chain of Custody certification before 1<sup>st</sup> April 2026, and who did not opt to transition to Version 2.1 for their upcoming audit, are required to report input and finished product quantities quarterly in accordance with Clause 2.4 of the Chain of Custody Standard Version 2.

Under current practice, new applicants are not included in data reporting requests until certification has been achieved. Therefore, during the transition from Version 2 to Version 2.1, applicants will not be required to have submitted data by the time of their initial audit. To demonstrate compliance, they must instead show that they have the systems and commitment in place to submit the required data.

The first required data submission for newly certified applicants will be the January 2027 reporting request, covering the 2026 reporting period (1 January–31 December 2026).

***Important note:** Where an initial audit is conducted against Version 2, the subsequent annual surveillance audit must be conducted against Version 2.1.*

**Example:** You are a new applicant who submitted your application form in March 2026 against Version 2, and you did not opt to transition to Version 2.1 for this audit, you are **not** required to report on input quantities and finished product quantities for your initial audit.

However, you are required to demonstrate systems and commitment in place to submit the required data when requested to do so.

## Version 2.1 – Current certificate holders

### Recertification and surveillance

The following applies to current certificate holders audited against Version 2.1 in the following scenarios:

- Certificate holders due for recertification who opted to transition
- Certificate holders who applied for recertification after 1<sup>st</sup> May 2026
- Certificate holders with surveillance audits scheduled on or after 1<sup>st</sup> May 2026

All of the above are required to report input and finished product quantities annually in accordance with Clause 2.4 of the Chain of Custody Standard Version 2.1.

To reduce duplication of data reporting during the transition from Version 2 to Version 2.1, compliance can be demonstrated by submitting data for the reporting request for Q1 2026 issued in April 2026 only. No further data reporting requests will be issued in 2026.

The next required submission will be in January 2027, covering the 2026 reporting period (1 January–31 December 2026).

**Example recertification:** Your recertification audit due date is in June, and you submitted your recertification application form in January against Version 2, 6 months in advance. However you opted to transition to Version 2.1 for this audit. Therefore, you are required to report on input quantities and finished product quantities annually in accordance with clause 2.4. of Chain of Custody Standard Version 2.1.

In this case, you will need to demonstrate the submission of data reporting for Q1 2026. The next required data submission will be the January 2027 reporting request, covering the 2026 reporting period (1 January–31 December 2026).

**Example surveillance:** Your surveillance audit is due in August 2026 against Version 2.1, therefore,

you are required to report on input quantities and finished product quantities on an annual basis in accordance with clause 2.4. of Chain of Custody Standard Version 2.1.

In this case, you will need to demonstrate the submission of data reporting for Q1 2026. The next required data submission will be the January 2027 reporting request, covering the 2026 reporting period (1 January–31 December 2026).

## Version 2.1 – New applicants

The following new applicants are required to report on input quantities and finished product quantities annually in accordance with Clause 2.4 of the Chain of Custody Standard Version 2.1:

- New applicants who submitted an application before 1st April 2026 against Version 2 and opted to transition to Version 2.1 for their upcoming audit
- New applicants who submitted an application after 1st May 2026 against Version 2.1

New applicants are required to complete an [Excel form](#) covering all data for 2025 (1 January–31 December 2025), and submit to MarinTrust via the [standards@marin-trust.com](mailto:standards@marin-trust.com) email.

The next required submission will be in January 2027, covering the 2026 reporting period (1 January–31 December 2026).

## Appendix 1 - Decision Flow

