



The MarinTrust Improver Programme: Application Process & Surveillance Procedures

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1.0 Overview

This document sets out the process by which the fishery and factory components of the MarinTrust Improver Programme (IP) are operated. The IP provides a mechanism for fisheries that do not currently meet the MarinTrust requirements to work towards approval for certification, along a structured pathway and in alignment with the MarinTrust Quality Control System (QMS, providing guidance on good practices).

There are two components to the IP:

1. The fishery sourcing into the marine ingredient production supply chain which requires improvements and,
2. The factory sourcing raw material from an improving fishery to produce marine ingredients.

The programme also enables such fisheries to obtain recognition for consistent progress made towards achieving MarinTrust approval. Fisheries approval in MarinTrust is based on meeting the requirements laid out in the FAO's Code of Conduct for Responsible Fisheries (CCRF, <http://www.fao.org/3/a-v9878e.pdf>). The full MarinTrust fishery assessment can be found on the MarinTrust website here.

The IP also provides recognition to marine ingredient factories sourcing from an improving fishery. This is done by the factory complying with the MarinTrust standard via an audit carried out by a third party certification body. The full factory standard can be found here.

Those accepted onto the IP and committed to improvement requirements may use approved statements to demonstrate the nature of the production and the link to the MarinTrust brand, however they may **NOT** use the MarinTrust logo (see QMS doc. C4 MarinTrust Logo Management and the MarinTrust Improver Programme Accepted Sites Claims Agreement [here](#)). More information about claims can be found in Section 5.7 and 5.8 of this document.

What is a Fishery Improvement Project (FIP)?:

A FIP is a demonstrable multi-stakeholder effort to improve the sustainability of a fishery and can vary in scope and nature. To be a credible FIP it must meet a number of requirements pertaining to participation, funding, transparency, and scientific rigor which are outlined in this document.

Aim of the Improver Programme:

To encourage and facilitate local stakeholders, lead by industry, to improve the fishery they are sourcing from for the benefit of everyone. FIPs that are accepted onto the IP have up to 5 years to complete their FIP. After this time it is expected that they will apply for full approval of the fishery (via the full certification process for the factory/ies).

Process

The following MarinTrust IP stages make up the core of the process by which fisheries obtain and maintain acceptance on the MarinTrust IP:

1. MarinTrust Fishery Assessment and GAP Analysis

2. Development of a Stakeholder led Fishery Action Plan (FAP)
3. Signed Agreement between Stakeholders
4. Peer Review and Application Committee
5. Fishery Action Plan Tracker & Surveillance Assessments
6. Progress towards Fishery Approval

The main body of this document details the procedures associated with each of these key steps. The diagrams below illustrate the overview of the MarinTrust IP application process in summary (Fig 1) and in detail (Fig 2):

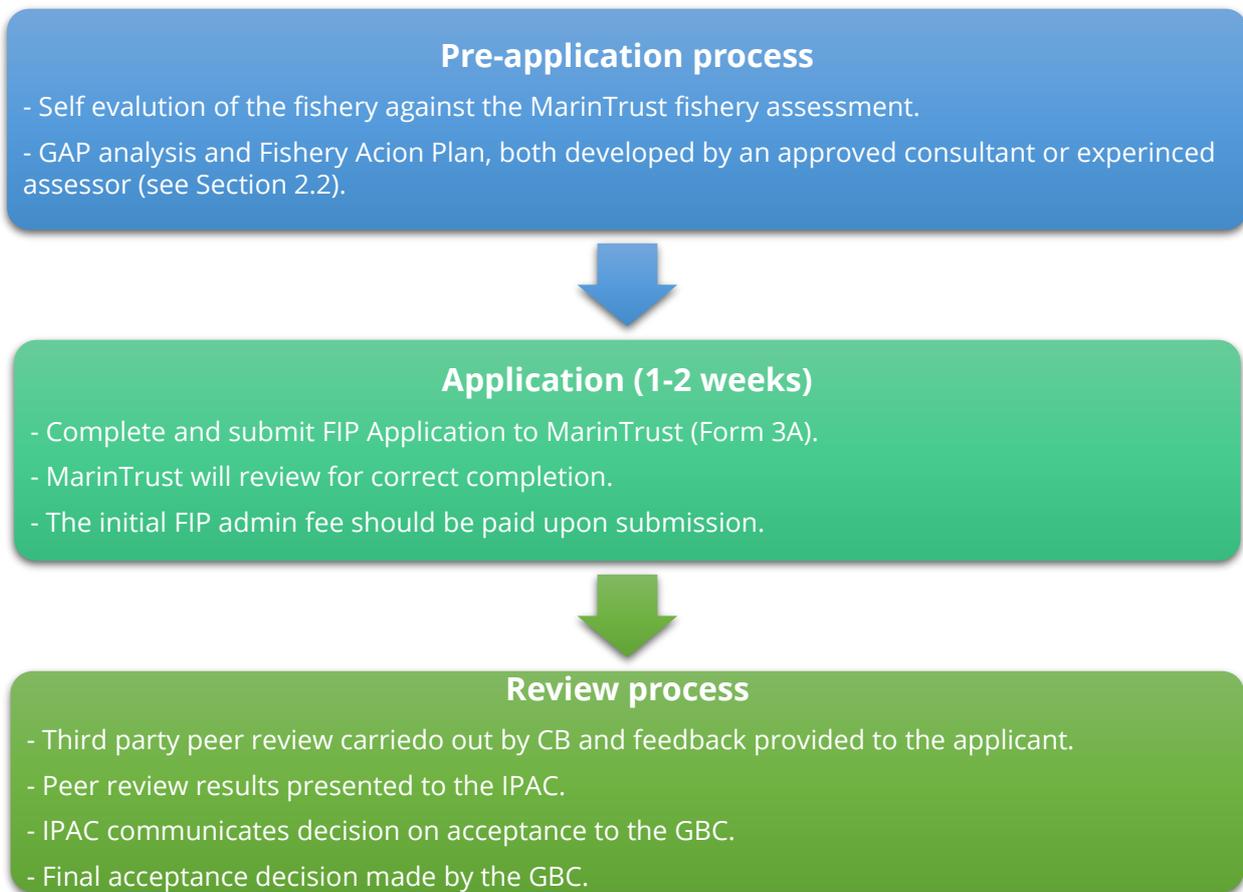


Figure 1 Overview of IP FIP application process

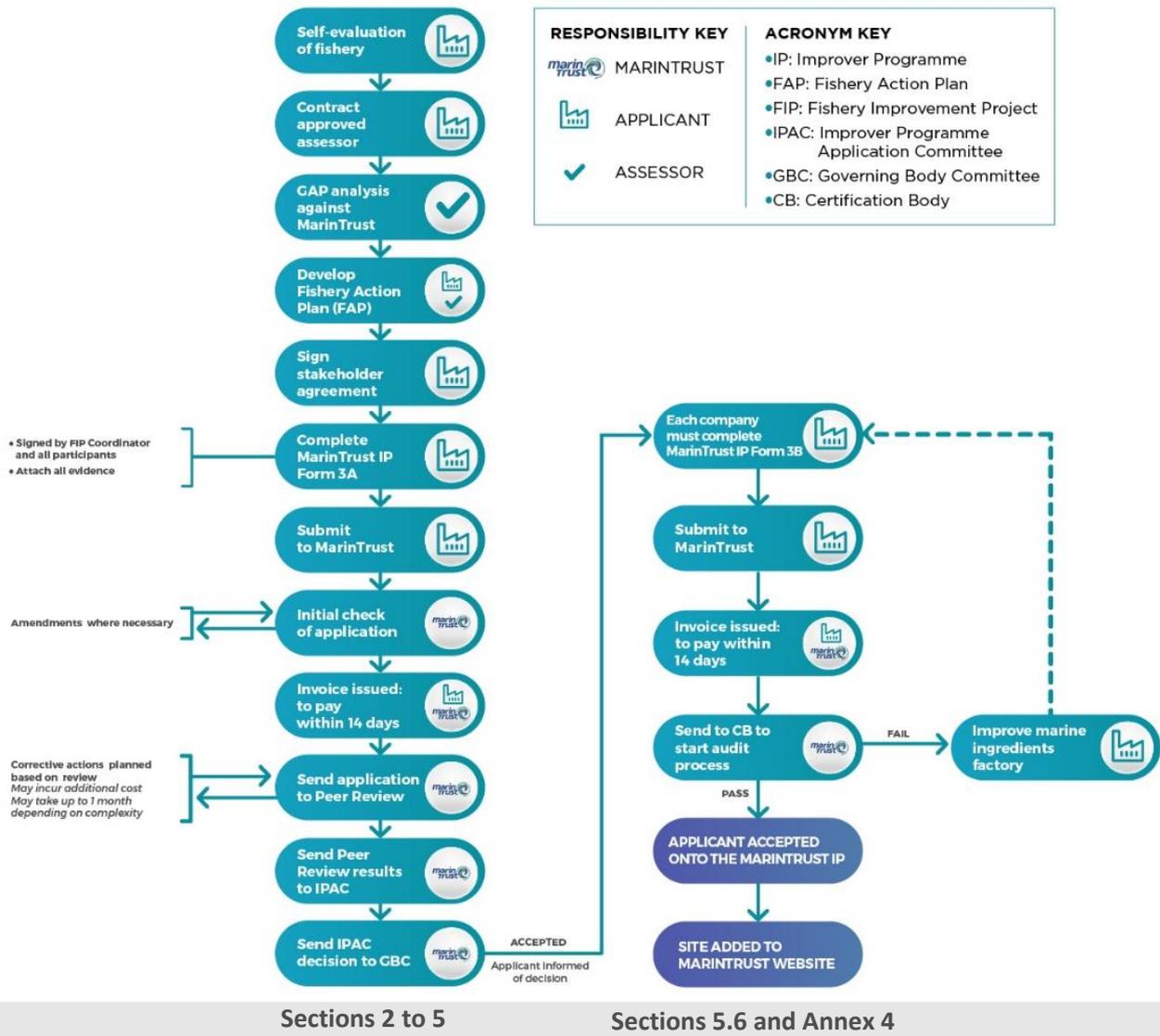


Figure 2 IP application process in detail

2.0 MarinTrust Fishery Assessment & Gap Analysis

The objective of the IP assessment and Gap analysis of an applicant fishery is to determine the areas in which the fishery does not currently align with the FAO's CCRF objectives and principles, and hence does not meet the MarinTrust fishery assessment requirements. The results of the assessment are designed to highlight information, management and status gaps and are summarised via the gap analysis. The IP assessment report also contains additional information on the background of the fishery (as described below).

2.1 MarinTrust IP Fishery Assessment

The MarinTrust IP fishery assessment should be carried out by either: a) an independent party with expertise in benchmarking seafood certification schemes, and who are deemed trained, competent and relevant to the MarinTrust standards by the MarinTrust Secretariat in line with document B2 (Training and Appointments Procedures) in the QMS.; or b) A qualified fishery expert nominated by the applicant who has relevant local knowledge of the fishery. For those without the relevant experience in the MarinTrust fishery assessment or Improver Programme process, training may be provided by MarinTrust. The purpose of the assessment is to establish the nature of the gaps and deviation from full MarinTrust approval, as well as the feasibility of the unit of assessment being requested to close those gaps within a specified time period (up to 5 years).

The primary objective of the MarinTrust IP fishery assessment is to gather information to support the production of the GAP analysis and, in Stage 2, the Fishery Action Plan.

2.2 IP Assessor requirements and qualifications

The proposed Assessor(s) must either be approved by MarinTrust (as listed on the MarinTrust [website](#)) or they must meet the required levels of competency outlined below. Prior to approval, an Assessor must submit a detailed CV to MarinTrust covering professional qualifications, training and experience in the area of expertise required for fishery related assessments for the MarinTrust Standard and the MarinTrust IP. A copy of each document will be obtained from each potential Assessor to verify and confirm their qualifications and experience.

The proposed Assessor(s) must meet the following criteria:

1. Have verifiable experience in one or more areas of fisheries science and/or management, as listed below:
 - Local expertise (thorough knowledge of the fishery management organisations, fishery activities and other appropriate expertise); or
 - Specific expertise, either in fishery stock assessment, fishery ecosystem interactions, socio-economic interactions, or fishery resource management practices, depending on the fishery.

2. (Optional) In order to be a MarinTrust approved assessor, they must be able to demonstrate appropriate knowledge of the MarinTrust IP application process by meeting the following requirements:
 - Completion of a full MarinTrust (valid version of assessment at the time) fishery assessment training session,
 - Completion of a full MarinTrust Improver Programme training session,
Successfully passing the fishery assessment and IP training assessment exam.

For a new Assessor to be approved, the MarinTrust secretariat, or suitable individual nominated by the GBC, will review the applicant Assessor CV against the relevant Assessor criteria stated in the appendix. This may be followed by an interview, if deemed necessary, to verify all the statements made on their CV. If the criteria are satisfied, the applicant Assessor will proceed to stage two of the approval process.

The applicant Assessor will be required to:

- Attend an approved MarinTrust and MarinTrust IP training course. The applicant Assessor shall be required to successfully complete the course and pass the written exam.
- To establish Fisheries Assessor competence, MarinTrust shall determine this through a professional experience review, with all reviews documented and approved.

The MarinTrust Secretariate will maintain a master list of approved IP Fishery Assessors. Information on all new approved Assessors will be listed in the MarinTrust website here.

Assessment performance will be determined through review by the MarinTrust Secretariat and applicants' feedback. If an Assessor does not complete the assessment with the due diligence and required expertise, their approval status may be revoked.

Assessors should declare any potential conflict of interest, and any undeclared conflict may be used as grounds for rejection of the application by the MarinTrust IP Application Committee

2.3 MarinTrust IP Fishery Assessment Method

The MarinTrust IP fishery assessment is led and arranged by a MarinTrust approved assessor or relevantly experienced consultant as explained above. An assessor will possess relevant knowledge and expertise for the fishery assessment scope.

The assessor shall inform the applicant of the purpose and objectives of the MarinTrust IP assessment process. The objectives of this process are as follows:

1. To understand the status of the fishery in the context of the MarinTrust standard;
2. To inform the applicant of any areas of fisheries management that need to be addressed by the applicant in order to achieve approval of their fishery;
3. To act as a foundation for the formulation and execution of a Fishery Action Plan.

The MarinTrust IP assessment also identifies the fishery stakeholders (those involved in the management of the fishery in particular). The applicant shall facilitate the IP assessment by providing access to

supporting information and evidence as required. The MarinTrust IP assessment shall be based on, but not restricted to, reviewing fishery documentation and direct communications with fishery stakeholders.

In addition to completing a full fishery assessment using the standard MarinTrust fishery assessment template, the Assessor team shall ensure the following issues are documented:

1. General background information on the history of the fishery, especially including data on landings, vessel numbers and type, gear and any details on harvest controls;
2. General information on the species in the fishery, and where possible their life history strategies within the geographical location of the fishery, and any history of stock population structures in those locations;
3. Current principal management authority governance, including policy objectives and/or relevant regulations;
4. Recent (less than 10 years) fishery landings and the general economic situation of the fishery;
5. Overview of the fishery including an organisation identified with responsibility for the fishery, detail on fishery management practices, scientific assessment of the stocks, and a clear definition of the unit of assessment being proposed;
6. Other relevant fisheries in the vicinity not subject to assessment but that may interact with the fishery being assessed;
7. External factors (any social, economic or environmental issues) that may affect the fishery and its management;
8. A list of key stakeholders in the fishery and their special interests, where relevant; and

If relevant, information for any subsequent product Chain of Custody recognition.

The assessment report shall be completed using the MarinTrust fishery assessment template and shall include the following:

1. An overview of the fishery management framework with an organisational plan of the principal management organisations, their roles and responsibilities;
2. A review of the availability of data in the various categories to be included;
3. A determination of the overall scope of the full assessment (i.e. Unit of Assessment);
4. A description of potential obstacles or problems that may be barriers to approval within an agreed reasonable period of time;
5. Identification of organisations and entities that will be important for engagement in the event of a full assessment.

2.4 Desktop review and analysis of information

Desktop review and analysis of fishery and fishery-related information form a major component of the assessment.

Fishery information:

- Information types and sources can range from legal instruments such as acts, regulations, and laws; official documentation published or required for collection by the management authorities or official organisations (permits, landing declarations, official catch records).
- Review activities may include scientific and statistical information concerning the status of the fishery resource, such as agency reports, stock assessments, and supporting research from state or official scientific sources organisations, including published science or objective information from independent research produced by recognised institutions or otherwise credible sources.

Where possible, independent information should be peer-reviewed and published, although the assessor must review the validity and importance of information on the outcome of the assessment. ‘Softer’ unofficial information, either in printed format or contributed verbally at meetings, may also be used in supporting the general body of documented information. The assessor should be sure to make clear the source of all evidence and remain aware of the source when considering its relevance and reliability. Any concerns, including if information contains conflicting facts with other sources, shall be highlighted to the peer reviewer and IP Application Committee.

Fishery-based information can come from a number of areas, both directly and indirectly from the client fishery, management organisations, fishery participants and associated entities, and (if required) through on-site interviews and witnessing of management processes.

The assessment should proceed according to the procedures set out for the full MarinTrust fishery assessment. This includes the use of the fishery assessment template, guidance, and associated documentation as outlined in the MarinTrust Quality Control System and on the MarinTrust [website](#).

GAP Analysis

There are two main components to the GAP Analysis: information gaps, and status gaps. Information gaps are those areas in which there is currently insufficient information to enable scoring of the relevant section of the MarinTrust fishery assessment. Status gaps are those where there is sufficient evidence to enable the assessment team to reliably determine that the fishery does not currently meet the requirements of the relevant section.

The assessment team will utilise the results of the IP assessment to assign a Gap Rating (Pass, Status Gap or Information Gap) to each section of the MarinTrust fishery assessment. The Gap Rating signifies the confidence of the assessment team in the quality of information that demonstrates conformity of the fishery at meeting a particular clause.

The definition of Gap Ratings assigned by the assessor shall be as follows:

Information Gap Rating: Information/evidence is inadequate or contradictory to determining whether an element of the fishery complies with the requirements of this section of the MarinTrust fishery assessment. In these cases an Information Gap rating is assigned. These are areas in which additional information is needed before the assessor can reliably determine whether the fishery meets the MarinTrust requirements. These gaps may be solved via discussion with the fishery stakeholders to obtain further information. Alternatively, the generation of additional data (via, for example, a new

fishery data collection regime) may form part of the Fishery Action Plan. In either case, the determination in this section will need to be reviewed once sufficient information is available to determine whether the fishery is awarded a Status Gap or a Pass rating.

Status Gap Rating: Information/evidence is sufficient to reliably demonstrate that the fishery is not in compliance with the requirements of this section of the MarinTrust fishery assessment. In these cases a Status Gap rating is assigned. These are areas in which the status of the fishery is well understood, but does not meet the MarinTrust requirement(s). These gaps will generally be solved via the development and application of the Fishery Action Plan.

Pass Rating: Pass ratings represent sections of the MarinTrust fishery assessment which have been passed by the fishery during the assessment. There is adequate information to reliably determine that the requirements have been met. These sections will generally not appear in the Fishery Action Plan but an applicant may include them if further relevant work is planned.

3.0 Development of a Stakeholder-led Fishery Action Plan

The Applicant must develop and implement a Fishery Action Plan (FAP), with an associated and appropriate budget and deadlines, designed to address the deficiencies in the fishery necessary to achieve the project's objectives. An assessor and/or consultant, who has expertise in both the fishery and the MarinTrust fishery assessment process, may be used to assist in the development of the FAP. The applicant may use an approved MarinTrust assessor (as listed on the MarinTrust website here) or utilise in-house expertise if available and suitably experienced. The applicant may also choose to have their application checked or peer reviewed prior to submission at their own cost. The assessor and/or consultant will have no say regarding the acceptance, or not, of the fishery onto the MarinTrust IP. After Peer Review by an approved and independent accredited Certification Body, the final decision will be made by the Improver Programme Application Committee (IPAC), who will make this recommendation to the MarinTrust Governing Body Committee (GBC) for the final confirmation.

Once accepted onto the IP programme, the FAP, its associated deadlines and all other pertinent information must be made publicly available via the MarinTrust website and, if relevant, other FIP repositories (this could be a specific website developed by the FIP stakeholders). Details of where this information can be found should be made available to MarinTrust so they may provide a link on the website.

The budget information does not need to be made publicly available, but evidence of an adequate budget for the project must be made available to the peer reviewer. A confidentiality agreement can be put in place if needed.

The Fishery Action Plan must include (at a minimum):

- A set of improvement objectives, based on the gaps identified during the Gap analysis.
- Actions aligned with achieving the improvement objectives.
- Specific tasks under each action (if appropriate).
- Organisations or people responsible for completing each action/task.
- A month/year deadline for completing each action as relevant.
- Relevant budget information.

The fishery assessment team should assist the applicant with the confirmation of the following for the Peer Reviewer:

- Actions/tasks align with improvement objectives.
- Timeframes are plausible.
- There are no major red flags or risks to achieving the Fishery Action Plan given the information provided, or any other information that may be available to the team.

4.0 Signed Agreement between Stakeholders

Participants must commit to financially and/or operationally invest in, and make improvements to, the fishery. Commitments should be formalised and may take the form of a signed Memorandum of Understanding (MOU) or other relevant document detailing those commitments made by each participant (fishery stakeholders) involved in the FAP.

The agreement should include active participation by at least one company from each section of the supply chain. Active participation means contributing financial or in-kind support to the project and/or a commitment to working on activities in the Fishery Action Plan.

At this point, the improvement effort involving multi-stakeholders, a credible FAP with a plan for regular reporting on improvements within a specified time frame will be termed a Fishery Improvement Project (FIP).

Considered as a whole, the participant organisation(s) are referred to as the Applicant. The Applicant is responsible for submitting the IP application to MarinTrust. In addition to the IP assessment, the GAP analysis, and the Fishery Action Plan, the application must include the following details:

Applicant Name	<p>Accurately reflects the scope of the applicant fishery, being as specific as possible about location, species, and gear.</p> <ul style="list-style-type: none"> • If the applicant does not represent the whole fishery, the name should specify what portion is covered. • If multiple improvement projects exist in the fishery, names should distinguish between them.
MarinTrust Stage	<p>IP</p> <ul style="list-style-type: none"> • An indication of whether a Fishery Improvement Project (FIP) is already underway, and if so for how long it has been active, and how much progress has been made.
Objective(s)	<ul style="list-style-type: none"> • One or more objectives that define the scope of the FAP. • Objectives must be time bound (include end date), and measurable (e.g., by X date, the FAP will accomplish Y). • Scope of objectives is appropriate for the fishery type.
Description	<ul style="list-style-type: none"> • 3 to 4 sentences providing additional detail on the FAP’s scope and objectives entered.

Primary Applicant Contact	<ul style="list-style-type: none"> Contact information for at least one public applicant contact entered (this will usually be the FIP Coordinator).
Project Dates	<ul style="list-style-type: none"> Expected start date is based on whether there is an existing FIP in place; end date is based on the Fishery Action Plan. Month/year entered for both.
Species	<ul style="list-style-type: none"> At least one primary species selected.
Gear Type(s)	<ul style="list-style-type: none"> At least one gear type selected.
Location(s)	<ul style="list-style-type: none"> FAO Major Fishing Area completed. Information on EEZ and RFMOs entered if relevant. Information on the regulator of the fishery.

MarinTrust has produced standard Improver Programme application forms (Form 3A and Form 3B) which can be filled out to provide all of the required information.

4.1 Stakeholder roles as part of the Improver Programme

FIP Coordinator: The FIP Coordinator is in charge of communicating with MarinTrust on behalf of all of the FIP stakeholders and providing any information or updates. The coordinator is also in charge of submitting FIP application forms, FIP documentation and all FIP progress reports.

Marine ingredient product factories: The production factories should be active participants in the FIP stakeholder group during the development and progress of the FIP initiative in an appropriate way. The factories should also be part of the decision making processes as part of the FIP and are responsible for submitting company application forms related to factory audits as part of the MarinTrust IP.

Feed producers: Feed producers should be active participants of the FIP stakeholder group and contribute to the FIP initiative in an appropriate way (financial or otherwise). They should also be part of decision making processes as part of the FIP and can help provide industry leverage on behalf of the FIP initiative.

Government: Governments play an important role in FIPs and should be consulted throughout the development, implementation and monitoring of a FIP.

Other (NGOs etc.): Other actors should participate in the FIP as stakeholders and provide relevant resources, coordination and/or expertise as necessary.

4.2 Collaboration within a Fishery Improvement Project FIP

In some circumstances it may be appropriate for competing applicant organisations to cooperate to form a single robust and stakeholder-led FIP. If multiple industry organisations wish to develop a single FIP within the same fish stock and/or geographical region, the following principles must be adhered to:

- Mutual cooperation to promote FIP development.
- An MOU between all participants/ stakeholders in the FIP to allow collaboration and sharing of pertinent information should be produced.
- A lead Coordinator should be nominated and agreed to by all participants to facilitate collaboration and communicate application and amendments to MarinTrust.
- New participants to the FIP should be determined by the current participants. MarinTrust will not impose requirements on how these decisions are made or the requirements imposed on them, these should be determined by the FIP stakeholder group.
- Duties relating to the FIP, including financial obligations, should be distributed fairly and agreed to by all parties.

If necessary, the removal of FIP stakeholders from the applicant group should be considered in a fair way and should be agreed to by the FIP participants.

MarinTrust does not have any say, nor will they comment on, financial or participation decisions related to the FIP¹.

Should an additional factory join after the FIP has been accepted onto the MarinTrust Improver Programme, the nominated FIP Coordinator should submit the MarinTrust IP Application Form 3C to include the details of the new participants.

Should the stakeholder group wish to remove stakeholders or change the nominated FIP Coordinator, this should be communicated to MarinTrust via email and include contacts from all other stakeholder companies copied into the email.

The MarinTrust IP allows multiple IP projects to be in place on a single biological stock; however, all FIPs will be reviewed by the IP Application Committee to ensure that the stakeholders required to achieve the changes set out in the FIP are engaged and committed to the process and evidence submitted is credible. Any applicant group which has not secured the engagement of all necessary stakeholders (e.g. national or regional governments, scientific organisations, industry groups, etc.) will not be accepted into the Improver Programme. For this reason, during the formulation of the FIP, the applicant should actively

¹Note: Although MarinTrust does not get involved in the financial decisions for FIPs, any costs levied to additional entrants to any recognised FIP would be expected, under normal conditions, to be applied on a pro rata basis taking account of the number of members, the total cost and duration of the project, and the remaining time with which any new member may be involved in the FIP.

seek to include other fishery stakeholders and, where necessary, collaboration between multiple FIPs should take place.

4.3 Professional Conduct

The conduct of applicants and other stakeholders as part of the IP process should always be professional and with the aim of maintaining the integrity and credibility of the process as well as the objectives of the IP. Unprofessional conduct will not be tolerated and may result in sanctions against an application.

5.0 Peer Review & Application Committee

5.1 Peer Review

The IP assessment, Gap analysis outcome, FAP, and other application documentation shall form the application pack, which will be provided for Peer Review by an approved Certification Body Representative.

The MarinTrust Secretariate will arrange for the IP application pack to be reviewed by a peer reviewer from a Certification Body. The peer review team must be considered to be competent in all relevant aspects of fishery resource research and management, to the extent of being able to technically evaluate with confidence the content of the application pack.

Peer reviewers shall be briefed on the review process and be provided with a Peer Review Guidance document (Annex 1) and Template (Annex 2), where they will formally report their work. The decision made by the Peer Reviewer will then be recommended to the Improver Programme Application Committee (IPAC) for a determination for acceptance of the FIP. Final acceptance will be confirmed by the MarinTrust GBC.

The following elements shall form the basis of the peer review and confirmation evaluation:

A Review of the full Gap analysis study conducted on the fishery raw material to confirm the gaps and challenges against the MarinTrust fishery approval criteria (as outlined in the Peer Review Guidance attached as Annex 1 in this document).

B Review of the applicant stakeholder committee, to ensure that it covers a balanced range of stakeholders including the industry value chain, fishery management and NGOs, in accordance with MarinTrust IP criteria. The peer reviewer shall also ensure that any organisation listed as being responsible for an action in the Fishery Action Plan (FAP) is part of the stakeholder committee.

C Review of the FAP, to ensure it has been approved by the stakeholder committee and includes identification of key issues and stakeholders, prioritisation of actions and agreement on improvement milestones.

D Overall review of all application paperwork, including the application form, to ensure consistency and completeness.

Following the initial peer review results the applicant will be provided with the findings and be allowed an opportunity to respond and provide additional information should they feel it appropriate. At this stage if there are very different interpretations of the application pack the applicant and reviewer may have a discussion, facilitated by MarinTrust, to ensure an appropriate course of action is agreed. If there are any disputes regarding interpretation of the application documents, the IPAC have the authority to make a final determination.

The peer review may be carried out by the same reviewer two years in a row, however, for the third year the review should be carried out by a different reviewer. More guidance on this process can be found in Annex 1 of this document.

5.2 Improver Programme Application Committee (IPAC)

The MarinTrust Secretariat shall convene an IPAC Meeting with members of appropriate competence and independence as defined in the Improver Programme Application Committee Terms of References (Doc E5 in the QMS) which can be found here. Such competences shall be recorded in the MarinTrust Secretariat documentation along with statements in respect to potential conflict of interest. The IPAC will provide recommendations regarding approval or rejection of applicants for the MarinTrust Improver Programme to the MarinTrust GBC who will then make the final decision.

The IPAC will review applicant FIPs and make their decisions regarding acceptance onto the IP based on whether they determine the application as a whole (and based on the peer review guidance) has demonstrated that:

- A) It is a genuine attempt to improve the fishery and;
- B) the FIP stands a reasonable chance to gain MarinTrust fishery approval within 5 years.

5.3 Acceptance decision

There are 2 possible Acceptance outcomes in the fishery application process:

Full Acceptance: The IPAC accepts the application pack, the peer reviewer's comments, and any other evidence submitted by the client. At this point the fishery is accepted onto the Improver Programme, where it will remain, subject to continuing to meet the progress and surveillance requirements as detailed below. This decision will be recorded in the IPAC meeting Minutes. The IPAC may impose conditions to this acceptance decision (see Section 5.4 for more details).

Reject: The IP Application Committee or the MarinTrust GBC decides that the fishery improvement initiative cannot be Accepted based on the evidence submitted and their concerns cannot be resolved by setting conditions on the fishery. The Applicant will be free to repeat the application process as desired. This will incur the cost of application each time and it will be at the discretion of the IPAC to consider re-applications.

5.4 Acceptance Conditions

Acceptance conditions may be imposed to a fishery where the IPAC is unable to reach a unanimous decision, where there are concerns relating to the ability of the fishery to meet its commitments as outlined in the FAP, where there is deemed inadequate evidence to support the contents of the application, or where the FAP or any other component of the application is deemed inadequate. The purpose of this is to allow a fishery applicant an opportunity to correct relatively minor issues without having to re-enter the application process from the start or to impose a long delay of the GBC determination on Acceptance to the IP. These conditions will be time-limited, with deadlines which do

not exceed 6 months from the time the FIP is accepted on the IP. The conditions will be based on ensuring the fishery corrects whatever issue(s) were identified.

5.5 Notification of Acceptance Decision

The application will be reviewed by and accepted, in this order, by the assessment team, the peer reviewer, the IP Application Committee and subsequently the MarinTrust GBC.

All decisions on Acceptance status will be advised in writing to the respective applicants within 5 working days of the IPAC and then subsequently the GBC meeting by the MarinTrust Secretariat. A copy of this correspondence will be held in the applicant's file. At this time, information about the FIP will be uploaded onto the MarinTrust website. Applicants should not publish any information regarding their acceptance onto the MarinTrust IP until it has been formally accepted by the MarinTrust GBC. Once formally recognised as part of the IP, applicants may only publish MarinTrust documents as approved by MarinTrust. If an applicant is found to have violated this, it may result in penalties and potentially an application being declined.

6.0 Requirements for production factories as part of the FIP stakeholder group

The MarinTrust Improver Programme claim is made by marine ingredient production sites once they have complied with the two programme requirements:

1. Being a signed member of a MarinTrust accepted FIP
2. Pass a MarinTrust audit of the factory²

All factory audit applications and audits shall be carried out according to MarinTrust QMS doc. A2 (Guidelines for CBs managing applications for certification for the MarinTrust Programme) and doc. A4 (Conducting of MarinTrust Factory/Site audits by approved CBs).

If at any time the third party CB withdraws compliance to the MarinTrust standard from the production site, they shall notify the MarinTrust Secretariat who will remove the companies Acceptance Document from the MarinTrust website and the Improver Programme acceptance will be revoked. This will be done in line with the QMS doc. A5 (The issuing and the withdrawal of certificates to the MarinTrust certification programme).

To ensure applicants aim for full compliance with the IP, the following condition applies: within 12 months of the FIP being accepted by the MarinTrust Governing Body Committee, at least one marine ingredient factories must pass a MarinTrust audit and satisfy both of the above criteria. If no factory has passed an audit by the 6 month mark, the MarinTrust Secretariat will open a dialogue with the applicant to determine the reasons for the delay. If the situation is not resolved following this communication, the IPAC will be asked to consider the application on a case by case basis to determine if any sanctions should be imposed against the applicant.

The IPAC will have full authority to make any decisions regarding an extension to this requirement and the continuation or not of an applicant on the programme. More information can be found in Annex 4.

² If the country in questions has a lack of access to suitably trained auditors, this will be taken into account during the IPACs determination.

7.0 Expectations and Recognition for those on the MarinTrust IP

The MarinTrust Improver Programme claim can only be made by marine ingredient production factories. In order to use the MarinTrust IP claim applicants must comply with the following:

- Apply via the MarinTrust IP process and conform to all assurance steps within it. The applicant may be recognised once the FIP is accepted and a MarinTrust audit passed.
- Must meet improvement milestones during the process.
- Must conform to the surveillances and peer reviews throughout the process.

Should the applicant comply with the above expectations and those outlined in this application document, the following recognition will be provided by MarinTrust:

- MarinTrust IP acceptance status (listed on the MarinTrust website on the IP accepted sites page, [here](#)).
- A document of acceptance will be provided by MarinTrust to the applicant outlining the scope of the acceptance.

7.1 FIP stakeholder recognition

For those stakeholders that are part of a MarinTrust Accepted FIP but are not marine ingredient producers, they may not claim Improver Programme Acceptance. They may however make the following claim:

- A stakeholder as “part of a MarinTrust accepted FIP”.

More details about FIP stakeholder claims can be found in document A13 in the QMS.

8.0 Fishery Action Plan Tracker & Surveillance Assessments

To ensure that an accepted FIP remains in compliance with the requirements of the IP, surveillance assessments will take place after 6 months, 12 months, and subsequently at least annually. More frequent surveillance assessments may be conducted if deemed necessary by the peer reviewer or Application Committee. The 6 month surveillance will be carried out by MarinTrust with subsequent surveillances being carried out by external peer reviewers.

The 6 month surveillance will be carried out 6 months after the acceptance of the FIP onto the IP. This surveillance will be done by MarinTrust and will check that actions raised during the application process, either by the external peer reviewer or the IPAC, have been completed or initialised (depending on the timeframe imposed). An initial check will also be made on meetings between FIP stakeholder groups and any relevant actions due at the 6 month mark as part of the FAP. It is recommended that a full fishery assessment is carried out on the fishery part way through the FIP timeline to ensure the information used to develop the FAP is still representative.

8.1 Surveillance assessment

The annual surveillance assessment of accepted FIPs may be carried out either by an approved MarinTrust IP assessor or a suitably qualified consultant hired by the applicant as outlined in section 1 of this document.

The assessor should:

1. Familiarise themselves with the IP fishery by reviewing the application documentation, particularly the Fishery Action Plan, and any previous surveillance assessments.
2. Contact the IP fishery a minimum of 1 month before the surveillance assessment is due as a reminder to provide the information required to conduct the surveillance assessment.
3. Conduct a review of the status of the fishery against the tasks and actions which were identified in the Fishery Action Plan.
4. Complete a MarinTrust IP surveillance report, culminating in a recommendation on whether or not the fishery should remain in the Improver Programme according to the surveillance determination approach described below.
5. Submit the surveillance report to MarinTrust who will then arrange for the peer review and review by the IPAC, as described in Section 4.

The surveillance assessment should focus on areas where actions have been defined by the Fishery Action Plan as being due, but also consider any other evidence provided by the fishery and revise areas of the surveillance report accordingly. In areas where there were no defined tasks due and the fishery does not provide any evidence, the surveillance assessment should outline a brief review of publicly available information to ensure no inappropriate actions have been taken.

The assessor or consultant should communicate directly with the MarinTrust FIP fishery to offer an opportunity to address any missing or unclear information as needed. Any enquiries and replies between the reviewer and IP fishery should occur within a reasonable timeframe. If a lack of information provision prevents the completion of the surveillance assessment within 1 month of the date it is due, the IP fishery may be suspended from the Improver Programme until such information is provided and the assessment report is completed.

8.2 Evidence

The fishery must submit the evidence to the surveillance assessor or consultant demonstrating that the fishery has completed the tasks which are defined by the Fishery Action Plan as due to be completed by the relevant surveillance date. This should include any links to public documents for easy access (as hyperlinks). Where possible, the language of these documents should be in English, however, where documents are in a local language, a summary of the contents of these should be provided in English for the review process and public transparency.

The ultimate decision of whether evidence can be considered reliable will be made by the peer reviewer, who will generally require that evidence which is not publicly available be documented in writing, dated, and have a defined source (whether an organisation or individual). All applicants are encouraged to make documents related to the Accepted FIP public to ensure transparency. For those FIPs which do not have their own online repository for evidence documents, the MarinTrust website may be used to host such documents.

Evidence adequate to demonstrate that a Fishery Action Plan task has been completed will vary depending on the action. The following are potentially valuable sources of evidence:

- Scientific papers or drafts thereof, reports, conference presentations and papers;
- Meeting agendas and minutes;
- Letters sent to or from fishery stakeholders;
- Media articles;
- Fishery legislation or regulation.

8.3 Surveillance determination

An assessment determination is advised by the surveillance assessor via the IP milestone report, reviewed by the peer reviewer, and finally confirmed by the IPAC. The determination is based on the extent to which the IP fishery has achieved the goals and completed the tasks outlined in the FAP. There are 3 potential surveillance determination outcomes:

- **Maintain IP status:** Where the FIP is able to demonstrate that it has completed the tasks defined by the FAP, the surveillance assessment team should recommend the IP status of the fishery be maintained.

- **Conditionally maintain IP status:** Where the FIP is not able to demonstrate that it has completed the tasks defined by the FAP, one or more conditions will be raised, against which its continuing IP acceptance will be contingent.
- **Suspend IP status:** Where a FIP has failed to provide sufficient evidence to demonstrate that it has met the requirements set by a Condition placed on it via a previous surveillance assessment, the FIP will be suspended from the MarinTrust Improver Programme.

8.4 Conditionally maintain IP Status

A fishery which is found to have fallen behind the timeline defined by the FAP, as described above, will have one or more conditions raised against its acceptance on the Improver Programme. The precise nature and timeline of these conditions shall be determined through the usual IP review process (i.e. recommended by the surveillance assessment team, reviewed by the peer reviewer, and finalised by the IPAC), but will adhere to the following guidelines:

1. Where a fishery has failed to meet a defined milestone or complete a specific task, a Condition will be raised requiring that milestone to be met or task completed.
2. Any Condition raised will be subject to a time constraint in the form of a date by which the Condition must be met. The duration of the period given to meet the Condition shall take into account the individual fishery circumstances and the reason for the Condition being set, but shall not be more than 1 year (or 6 months if arising from the first surveillance assessment).
3. Any Condition with a deadline which does not match an existing surveillance date will be individually assessed by the surveillance assessment team via the surveillance assessment mechanism at the relevant time.
4. Any fishery which has not met a Condition by the assigned deadline may be suspended from the MarinTrust Improver Programme and given Suspended IP status, as described below.

8.5 Suspended FIPs

FIPs which fail to demonstrate consistent progress along the FAP timeline will be suspended from the IP as described above, and following the procedures in the MarinTrust Quality Control System (doc. A5 here). A suspended FIP may be re-instated to the Improver Programme if it meets the requirements of the Condition(s) which resulted in its suspension within 6 months of the suspension (dependent upon continuing to meet any other requirements, such as surveillance assessments). Re-instated fisheries must adhere to the original improvement timeline.

Any FIP which is unable to meet the Conditions within 6 months of suspension will be fully removed from the Improver Programme. A suspended fishery not able to make the appropriate changes in the 6 month probation period due to extenuating factors (i.e. factors beyond the control of the applicants such as natural phenomenon) may apply to the IPAC for a time extension to make these improvements. The IPAC will have the final say on whether to grant this extension or not. A suspended fishery will be eligible to re-apply via the standard IP application process no less than 1 year after the initial suspension. Such FIPs will be subjected to additional scrutiny by the initial assessment team, peer reviewer, and IPAC, and may be required to demonstrate that they are able to meet the Conditions of their previous accepted status

before they are re-admitted. Upon re-acceptance, FIPs may not receive additional time on top of the original FAP timeline.

8.6 FAP changes

Changes to the FAP may be necessary while the FIP is in the MarinTrust Improver Programme. Changes may be required to reflect new information (e.g. an improved understanding of the catch composition, new information on discarding, the results of an ecosystem analysis, or an updated understanding of stock structure); changes may also be needed to reflect components of the FAP progressing faster or more slowly than anticipated. In some cases these changes may form a planned component of the FAP, particularly in fisheries which enter the Improver Programme as data-limited fisheries.

Changes to the FAP should be made through a process of collaboration between the surveillance assessment team and the FIP similar to that described earlier in this document for the initial drafting of the FAP. Any changes must be highlighted in the next scheduled surveillance report and subsequently approved by both the peer reviewer and the MarinTrust IPAC.

Note: Should there be legislative changes that may impact an accepted FIP (in terms of scope and/or improvement actions), the applicant is responsible for informing MarinTrust as soon as it becomes aware of such information. The applicant must also adapt their FIP documentation to comply with such legislation changes and submit them to MarinTrust in a timely manner.

8.7 FAP Extensions

This section outlines the potential scenarios that may result in a MarinTrust Improver Programme Accepted FIP requiring additional time to complete their FAP and provides guidance for the conditions attached to such extensions. All extension requests will be at the discretion of the IPAC and will only be granted if the fishery can demonstrate that continuous improvement and previous commitments have been made over the course of the FAP.

Extension conditions

Due to the nature of fisheries and potential impacts on them, it is understood that there may be times when an extension to the 5 year maximum timeframe is required. These should be extenuating circumstances that significantly impact a fishery and/or the industry that the fishery is sourcing to.

An applicant may request up to a 1 year extension for their FAP timeframe, although due to the seasonality of fisheries the time required may be longer. It will be up to the applicant to inform the MarinTrust Secretariat as soon as they become aware of the need for an extension of their intention to extend, so that this may be considered by the peer reviewers and IPAC at the appropriate time.

Extension request process

Should an Accepted FIP on the MarinTrust IP feel that they require additional time to complete the actions within their FAP, they must submit their intention to request an extension in writing to MarinTrust. This request should be made as soon as the applicant becomes aware of the need for an extension. The MarinTrust Secretariat will then follow up and request additional information and evidence for the reason

behind the extension request. In addition, the applicant will be required to provide an outline of how they plan to amend their FAP to account for the additional time, including actions to be extended, timeframes associated with each, and those responsible. Once this information has been provided and reviewed by the Secretariat, it will be included in their next annual peer review by an accredited certification body who will consider this request and the proposed changes to the FAP in their review. Should the extension request be during the final year of the original FAP timeline an additional review may be required, although this will be at the discretion of the IPAC.

Following the peer review, the IPAC will then review the request and will have the opportunity to ask for additional information and/or evidence for the reasons behind extension. Once the IPAC have made a determination of whether to approve an extension, the applicant will be informed in writing by the Secretariat.

There are 2 possible outcomes from the extension request:

Approved: If an extension is approved, the applicant is informed of the specific requirements from the IPAC associated with the extension which must be complied with to maintain acceptance on the IP during the extension. It is important that these conditions are communicated and agreed to by all FIP stakeholders. Should the applicant fail to do so, it will result in them being removed from the programme.

Declined: If an extension is declined, the applicant must comply with their original FAP timeframe and aim to complete all improvement actions with the 5 year limit.

8.8 Completed FAPs

Eventually, Improver Programme FIPs should reach the stage where they believe themselves able to meet the full MarinTrust requirements and achieve MarinTrust approval. Fisheries may determine this for themselves, from the outcomes of the surveillance reports, or obtain expert advice from the surveillance assessment team or elsewhere. Fisheries which believe themselves to meet the MarinTrust requirements should apply to the scheme via the standard application process. It is important to note that completing the FAP and MarinTrust IP process does not lead to automatic MarinTrust approval, as a full fishery assessment must be conducted by an approved Certification Body (CB). A full fishery assessment conducted by the CB is the only route via which fishery material can enter the full scheme. A fishery successfully completing its FAP is unlikely to have been subjected to a full assessment (by any party) for a number of years, and so this final confirmation by the CB that the fishery has met the MarinTrust requirements is essential.

The maximum time that an accepted FIP may remain on the Improver Programme is 5 years. Should a fishery feel that they are unable to make sufficient improvement within the 5 years, they may appeal for an extension when this becomes apparent as outlined earlier in this document. In such cases, a determination will be made by the MarinTrust IPAC regarding a possible extension to the timeframe and will only be granted if the fishery can demonstrate that continuous improvement has been made over the course of the FAP.

If a fishery applies for full MarinTrust approval earlier than planned but is not approved, it may re-enter the Improver Programme, either by continuing with an existing FAP or by creating a new one, but may not exceed the overall timeframe of a FIP (5 years) unless this is approved by the IPAC.

8.9 Quality control and appeals process

MarinTrust is committed to consistent, accurate reviews of FIP progress, results, and impact. The Peer Review and IPAC processes serve as additional mechanisms to ensure the accuracy of FIP acceptance and surveillance decisions.

If the application/surveillance process described above is completed and the FIP stakeholders wish to appeal against the acceptance or surveillance decision, the stakeholder can enter into a formal appeals process to challenge the decision. This process is carried out in line with the QMS doc. A6 (Appeals and complaints procedure for the MarinTrust standard):

- Appeal filed with MarinTrust Secretariat. The FIP or other stakeholder files a notice of appeal within 30 calendar days of the IP process outcome.
- Initial review: a majority of the MarinTrust IPAC reviews the appeal and makes a recommendation within 30 calendar days of receiving the appeal.
- If the MarinTrust IPAC does not agree with the appeal, the MarinTrust GBC will convene. Both the raiser of the appeal and a representative of the IPAC will attend the GBC meeting to present information. The decision of the MarinTrust GBC will be final.

Decision communicated: the reviewer communicates the final decision back to the party requesting appeal. The communication will not be public, though the outcomes of the appeal decision will be made public if they affect the IP status of the fishery.

9.0 Glossary

Applicant

Marine ingredient producers/ processors involved in a FIP with a signed agreement/ MOU.

Participant

Individual companies as part of the applicant.

FIP Stakeholders

Any interested party within the FIP scope but not necessarily a participant.

FIP Coordinator/ Implementer

A single person in charge of coordinating work as part of the FAP and ensuring all FIP stakeholders are kept informed as well as communicating with MarinTrust on all FIP matters.

GAP Analysis

A Gap analysis identifies the differences between the fishery as it is at present and the ideal end point that the fishery wishes to reach (i.e. MarinTrust approval). This then allows a Fishery Action Plan (FAP) to be produced.

Improver Programme Application Committee (IPAC)

The IPAC are a group of experts from across the fishery value chain convened by the MarinTrust Secretariat to make decisions regarding acceptance into, and retention on, the MarinTrust Improver Programme.

Fishery Action Plan (FAP)

A FAP is a schedule of improvements based on individual aspects of the fishery that require improvements and take place within a specified timeframe.

Fishery Improvement Project (FIP)

A FIP is a multi-stakeholder effort to improve the sustainability of a fishery and may vary in scope and nature. To be a credible FIP it must meet a number of requirements pertaining to participation, funding, transparency, and scientific rigor.

Peer Review

The Peer Review is an evaluation of the FIP including all necessary documentation and will be carried out by an approved Certification Body representative in accordance with specified Guidance documents.

Improver Programme (IP) Assessment

An IP assessment is a preliminary evaluation of a fishery against all performance indicators to provide a picture of the fishery's baseline environmental performance and challenges. This allows a fishery to identify any areas that need to be improved to reach a final end goal.

Annex 1

MarinTrust Fishery Improver Programme Peer Review Guidance

The purpose of the Peer Review is to ensure that the contents of an application to the IP are accurate, consistent, and supported by the evidence provided by the applicant. The Peer Review is conducted by an approved Certification Body Representative with expertise covering the MarinTrust fishery assessment process, the Improver Programme, and fisheries management in general. The review should be carried out using the Peer Review template in Annex 2.

The following elements shall form the basis of the IP Peer Review evaluation:

A Review of the full GAP analysis study conducted on the fishery raw material to confirm the gaps and challenges against the MarinTrust fishery approval criteria, including the following areas:

- Ensure the fishery under assessment has been accurately characterised using the best available scientific understanding of the biological stock(s) and the catch composition.
- Ensure the species characterisation underpinning the structure of the report is accurate and defensible, including making sure that all relevant species have been included in the assessment.
- Confirm that throughout the report all significant statements and pass/GAP ratings are supported by adequate evidence, including references.
- Confirm that the report as a whole has been fully completed according to the process described in the MarinTrust fishery assessment guidance.

B Review of the applicant stakeholder committee, to ensure that it covers a balanced range of stakeholders including the industry value chain, fishery management and NGOs, in accordance with MarinTrust IP criteria. The peer reviewer shall also ensure that any organisation listed as being responsible for an action in the Fishery Action Plan (FAP) is part of the stakeholder committee.

C Review of the FAP, to ensure it has been approved by the stakeholder committee and also includes:

- An accurate representation of the Gaps identified during the Gap analysis.
- A clear set of action(s) which could reasonably be considered to resolve these Gaps, and the timescale over which these actions are planned to occur.
- Clear identification of the key stakeholder(s) responsible for carrying out each action. The peer reviewer should also confirm that any identified stakeholder is empowered and capable of implementing their action(s) under the circumstances of the specific fishery.
- An outline of the timeline along which improvements will occur, including milestones indicating the expected status of the fishery after 6 months, 12 months, and then every 6 months.

D Overall review of all application paperwork, including the application form, to ensure consistency and completeness.

In order to ensure the peer review process remains robust and constructive, the reviews should only be carried out by the same reviewer for 2 consecutive years. For the third year the CB should allocate the review to a different reviewer, or the work should be allocated to a different CB.

Annex 2

MarinTrust Improver Programme: Milestone Report PR Template

The purpose of the Improver Programme (IP) Milestone Peer Review is to review the evidence presented by an IP member FIP to demonstrate progress made along the FAP timeline. This includes ensuring that the information presented by the FIP is accurate, consistent, and supported by robust evidence. The Milestone Peer Review is conducted by an approved Certification Body Representative with expertise covering the MarinTrust fishery assessment process, the Improver Programme, and fisheries management in general.

The following elements form the basis of the IP Peer Review evaluation:

- A. Review of the FIP documentation to re-familiarise the reviewer with the fishery, including:
 - The initial MarinTrust fishery assessment;
 - The FAP timeline, in particular the scheduled Milestones;
 - Any previous Milestone Reports and Milestone Peer Reviews.
- B. Review of the new information submitted by the FIP to demonstrate progress against the scheduled Milestones. This information may take the form of a full MarinTrust Milestone Report, completed by a trained MarinTrust fishery assessor; or it may be a progress report drafted by the fishery itself.
- C. For each Milestone scheduled for this surveillance date, the peer reviewer should check to ensure:
 - The Milestone is referenced in the Milestone Report or progress report described above;
 - An indication is provided as to whether or not the Milestone has been met;
 - Where a Milestone is indicated as having been met, evidence is provided to support this.
 - Where a Milestone is indicated as having not been met, an explanation is provided as to why.
- D. Reach an overall conclusion as to whether the information provided by the FIP is adequate to justify the continuing inclusion of the fishery within the MarinTrust Improver Programme.

Applicant Overview Page

This section comprises a summary of the fishery being assessed for MarinTrust Improver Programme Acceptance.

Fishery under assessment	
Applicant details	
Management authority (Country/State)	
Species	
Fishery location	
Gear type(s)	
Other FIP Stakeholders	

Outline here any important acronyms used in the Peer Review

Summary

Summary: in this section, provide any additional information about the fishery that the reviewers feel is significant to their decision

Indicate here any conclusions or observations made during the process the reviewers feel should be discussed by the Improver Programme Application Committee (IPAC)

Fishery Action Plan Review

This section is designed to allow the peer reviewer to comment on specific actions reported on by the applicants. The applicants have completed the reporting table as outlined in the example below and the reviewers are asked to use the below tables to note any specific comments about these. Rows can be added or removed as needed.

Example table

MT clause (if relevant)	Action in plan Action update	Progress against milestones	Outstanding actions and rationale	Evidence	Status of action	PR comment	PR status of action
M1.1	Information provided by applicant in annual reporting document.					For the PR to provide any specific comments on each action.	For the PR to indicate if they agree with the current status of the action identified by the applicant.
M1.2							
Add rows to each table as necessary							

M – Management Framework and Surveillance, Control and Enforcement

MT clause	Action update	PR comment	PR status of action

A – Category A: Data Collection, Stock Assessment, Harvest Strategy and Stock Status

MT clause	Action update	PR comment	PR status of action

B – Category B Stock Status

MT clause	Action update	PR comment	PR status of action

C – Category C Stock Status

MT clause	Action update	PR comment	PR status of action

D – Impacts On Species Categorised as Vulnerable by D1-D3

MT clause	Action update	PR comment	PR status of action

F – Impacts on ETP Species, Impacts on Habitats and Ecosystem Impacts

MT clause	Action update	PR comment	PR status of action

SOCIAL CRITERION

MT clause	Action update	PR comment (leave blank)	PR status of action

Summary of Peer Review Outcomes

This section summarises the outcomes of the peer review process. Peer reviewers should review all of the Milestone documentation with the primary objective of answering the key questions listed in the table below. Reviewers should use their expert knowledge of the MarinTrust fishery assessment process and MarinTrust IP application process to determine whether the questions should be answered Yes or No. Where the situation is more complicated, reviewers may instead answer “See Notes”. Whichever of the three answers is chosen, additional information may be provided in the relevant section of this template.

	YES	NO	See Notes
A – Review of the FIP documentation			
No score required			
B – Review of the Milestone Report and/or fishery progress report			
Has the FIP submitted a full and detailed report explaining progress made along the FAP timeline since the time of the initial application or previous Milestone assessment?			
C – Milestone peer review			
Is every Milestone scheduled in the FAP to be completed by the date of this Milestone assessment included in the Milestone Report or fishery progress report?			
Does the Milestone Report or fishery progress report indicate whether the Milestones have been completed?			
Is the evidence provided in support of the completed milestones adequate?			
Is an explanation provided against any Milestones which have not been met?			
D – Overall Review			
In the opinion of the peer reviewer, taking all aspects of the FIP application and Milestone documentation into account, is the fishery progressing as planned along the FAP timeline, and therefore should it continue to be recognised by the MarinTrust Improver Programme?			

Detailed Peer Review Responses

Peer reviewers may provide additional explanation as to review outcomes in this section of the report. Reviewers do not need to fill out every section of the detailed responses; if the answer to a Key Question is clear-cut, no additional detail may be necessary. However, where there is complexity, uncertainty, or any other information the Application Committee should be made aware of, the peer reviewer may enter it here.

Peer Review Section	Additional notes from the Peer Reviewer
Should relate to table above e.g. B - xxxx	Provide any additional information to explain decision in the table above or why there is not a clear-cut score

CONCLUSION: In the opinion of the peer reviewer, taking all aspects of the FIP application and Milestone documentation into account, is the fishery progressing as planned along the FAP timeline, and therefore should it continue to be recognised by the MarinTrust Improver Programme?

Annex 3

MarinTrust Fishery Improver Programme Application Committee Guidelines

The purpose of the MarinTrust IP Application Committee (IPAC) is to utilise their expertise and knowledge of fisheries management and science to determine whether fisheries applying to the MarinTrust Improver Programme meet the minimum standards demanded by the MarinTrust Improver Programme. The IPAC considers the application after the peer reviewer has confirmed that the contents of all the documents are reliable, accurate and complete.

A fishery may only be accepted into the Improver Programme if the Application Committee determines that the following requirements have been met:

1 – Fisheries must be subject to an active Fishery Action Plan (FAP) which meets the other requirements detailed below.

2 – The FAP must include measurable objectives and must outline the deadlines by which the objectives will be achieved. These deadlines must be appropriate for the duration required to achieve the objectives, according to the expert opinion of the members of the IPAC.

3 – FAP Objectives must be based on a GAP assessment of the performance of the fishery against the MarinTrust V2 fishery assessment.

4 – The areas described in (3) must be covered by a full improvement timeline with long-term objectives corresponding to a status which will enable the fishery to meet the full V2 MarinTrust assessment requirements.

5 – The GAP assessment, FAP, and other application paperwork should, when taken together, represent evidence that the fishery is highly likely to be able to meet the requirements of a full MarinTrust fishery assessment within the timeline defined.

Annex 4

MarinTrust Improver Programme: Guidance for marine ingredient production factories

These guidelines are to facilitate factory improvement and as such are not a definitive guide, improvements may be achieved by other means that may be more appropriate for certain factories.

Marine Ingredient manufacturing factories wishing to be formally accepted onto the MarinTrust Improver Programme (MarinTrust IP) will need to be an official stakeholder of a FIP which complies with the MarinTrust Application Mechanism ([link](#)) and this FIP must be accepted onto the MarinTrust Improver Programme. The applicant must also be compliant to the MarinTrust standard, demonstrated by passing a MarinTrust audit.

Overview

All fishmeal factories wishing to join the MarinTrust IP must be able to demonstrate compliance with the MarinTrust standard through verification by an independent audit conducted by an approved Certification Body (list of approved CBs can be found [here](#)).

The Certification Body must be approved by the MarinTrust Governing Body Committee (GBC) to ensure that it has the correct credentials to undertake audits and to give assurance that all the required elements of the MarinTrust IP have been conducted in an appropriate and professional manner in accordance with documents from the [QMS](#).

The chosen Certification Body will formulate a contract between the applicant in accordance with the QMS detailing the requirements and commitments needed for acceptance onto the MarinTrust IP.

The objective of these guidelines are to provide a detailed guide to marine ingredient producers who want to apply to the MarinTrust Improver Programme, what requirements they must comply with, how they can proceed with application and what recognition they can expect to receive.

Outline of the MarinTrust IP requirements for marine ingredient producers

The MarinTrust IP process is managed by the MarinTrust Secretariat. A Potential Applicant can enter the MarinTrust IP by the following two entry points:

An applicant that has failed to meet the requirements of the MarinTrust Standard following a certification assessment by an approved MarinTrust Certification Body

or

An applicant that is unsure and thinks it may fail to meet the requirements of the MarinTrust Standard

Factory requirements

All marine ingredient producers wishing to become Accepted on the MarinTrust IP must comply with the MarinTrust [Standard clauses](#). However, as they are not sourcing from an Approved raw material source yet, they should instead be able to demonstrate that they are sourcing from an Accepted FIP as part of the MarinTrust IP (Section 1.4 in the standard). If the factory is not sourcing directly from the vessel (i.e. through a Collector) then they should be able to provide sufficient documentation to demonstrate where the fish was originally sourced.

Guidance has been developed identifying what full compliance to each standard clauses may look like [here](#), however other evidence or methodologies may be used to demonstrate compliance and it is up to the auditor to make a determination regarding this.

For example:

Clause	FULL COMPLIANCE
1.4.4 - The details of each consignment of fish from a vessel shall be recorded. This shall include:	The applicant will be able to provide all the information asked in the following six (6) sub criteria for each consignment of fish used in this plant that will be used as a raw material for the MarinTrust compliant fish meal and oil
(i) Name of vessel, IMO/registration number, call sign, legal owner, name and address,	Confirmed that all this information is clearly identified on all records that related back to the whole fish that is utilised within this factory Note: For a multispecies pilot FIP, it is not expected that all fish species are listed, however it is still important to provide evidence of where the whole fish has been sourced with as much detail as possible (geographic location and gear type etc.) to ensure the whole fish have come from the Accepted FIP scope.
(ii) Proof of authorisation to engage in the specific fishing activity,	
(iii) Date and time of discharge to facility,	
(iv) Species and quantity discharged,	
(v) Location or place(s) and dates of fishing activity where catch originated,	
(vi) Fishing method used,	

Note: MarinTrust are currently developing version 3 of the standard which will be available for public consultation in May. All new applicants in 2024 will be expected to comply with this new version so it is recommended that production factories review the proposed new clauses during the consultation period.

Application Process

Marine ingredient producers should follow a number of distinct stages which are described below.

Stage 1. Information Request and Self-Assessment

Information may be requested by a potential applicant within the marine ingredient manufacturing sector. A potential applicant could be a:

- Single producer
- A group of producers in national marine ingredients associations
- A secondary processor/distributor/feed manufacturer that will use their fishmeal producers as a designated sub-contractor

Potential applicants may request and obtain information from the MarinTrust Secretariat about the MarinTrust IP application process, the MarinTrust Standard, MarinTrust IP registration fees and potential timeframes to gain acceptance.

Applicants are strongly advised to carry out a self-assessment against the MarinTrust standard, in order to ascertain their readiness for an external assessment by an approved Certification Body.

Stage 2. Completion of Application Form 3B

If the potential applicant wishes to progress to application they will be requested to formally submit the MarinTrust IP Application Form 3B and associated evidence to the MarinTrust Secretariat. Within this form information of the raw material source, in this case a MarinTrust accepted FIP, is required so that this may be verified during the audit. It is the applicant's responsibility to ensure that the information supplied in the application is factual and as accurate as possible.

When the application form and associated MarinTrust IP registration fees are received by the MarinTrust Secretariat and accepted, the application pack will be forwarded to their chosen Certification Body to organise an audit of their factory.

Stage 3. Certification Body carries out a MarinTrust audit on the factory

The Certification Body auditors shall always conduct these initial assessments in an independent, professional and courteous manner.

The Certification Body will compile a report, detailing how the applicant does or does not meet the MarinTrust Standard. The Applicant must meet all criteria including those relating to Product Safety, Integrity and Traceability.

The report will identify any non-conformances against the MarinTrust Standard. Applicants will be required, as defined in approved action plans, to agree a programme for how they will improve their operations and correct any areas of non-conformances, in order to progress their acceptance application. The applicant should close these out within the 28 day period (in line with QMS document A4 [here](#)).

Should the factory fail the MarinTrust audit then corrective actions should be put in place to improve the gaps in compliance.

Stage 4. The Acceptance Decision

Should the applicant's factory pass the MarinTrust audit they will be issued with an acceptance document by MarinTrust for the duration of an audit cycle on the condition that they maintain compliance through the surveillances. The factory information will also be added to the MarinTrust website and the factory is eligible to use the MarinTrust IP claim (see IP claims document [here](#)).

Stage 5. Maintaining Acceptance

Maintaining acceptance on the MarinTrust IP is based on two main factors:

1. The factory must maintain compliance with the MarinTrust standard criteria through surveillances after year 1 and 2 and then a new audit cycle after year 3 and,
2. Continued support and recognition as a signed stakeholder of a MarinTrust Accepted FIP.

Recognition

The objective of the MarinTrust IP is to provide assurance to the MarinTrust GBC that any claim the applicant fishmeal manufacturer makes in regards to the MarinTrust IP concerning both their fishmeal and fish oil production and on the sourcing of their raw material can be fully supported. The outcome will be that the applicant marine ingredient manufacturer will have a clear improvement plan in place that will be completed in a designated period of time, which will lead to their factory being certified to the MarinTrust Standard with an approved raw material that is considered to be responsibly sourced. For those involved in the Multispecies pilot project, an end-point has yet to be defined, but the applicants are still expected to demonstrate improvements on an annual basis in line with the IP process and requirements.

Annex 5

MarinTrust guidelines for 6 month surveillance check of FAPs

Responsibly

The 6-month check on a FIP that has been accepted onto the MarinTrust IP will be carried out internally by MarinTrust.

Main aspects of the FIP to check against

MarinTrust will request an update on actions from the FIP Coordinator and ask for relevant documents to verify these. Evidence may include but is not limited to; Meeting Minutes, Summary documents, Assessment reports, Research projects, collected data.

MarinTrust will also:

- Confirm that appropriate actions raised during the Peer Review have been completed.
- Check that appropriate actions raised by the IPAC or GBC have been completed.
- Request confirmation from the FIP Coordinator that relevant meetings have taken place between the FIP stakeholders.
- Verify that specific actions have been carried out (by requesting evidence or checking provided documents) in line with the FAP for the 6-month milestone.
- Check against relevant long-term indicators that action has been initiated.
- Check any available public information that reports on the FIP including but not limited to FisheryProgress.org and FIP’s own websites.

The findings of this check will be presented in a table format with expected actions, evidence provided and the status of the action. This will be sent to the applicant to review and they will be given the opportunity to comment on the findings and provide additional information if they feel it is necessary.

Once this 6-month verification document is finalised it will be sent to the IPAC for discussion and approval. Once it has been approved by the IPAC it will be uploaded onto the MarinTrust website here.

6-month verification template

Identifier	Clause	Action identified by*	Proposed action	Evidence	Action status



**This is the party that indicated that they wanted to see this action take place, i.e. the IPAC, Peer Review.*

Amendments Log

DATE	ISSUE	AMENDMENT	AUTHORISED BY
2017/18	V1	<p>Extensive revisions for Version 2, including:</p> <ul style="list-style-type: none"> Revision of the Pre-Assessment and Gap Analysis procedures (Section 1) Revision of the Fishery Action Plan Development and Stakeholder agreement requirements (Sections 2 and 3) Addition of Peer Review and IP Application Committee Process (Section 4) Revision of surveillance and progress towards fishery approval procedures (Sections 5 and 6) 	IPAC
2020	V2	<p>Extensive revisions for Version 2.1, including:</p> <ul style="list-style-type: none"> Rebranding of IFFO RS to MarinTrust Inclusion of the following: <ul style="list-style-type: none"> Wording added regarding professional conduct Wording added outlining the timeframe for passing a MarinTrust site audit New section added outlining the expectations and recognition for those on the programme Fishery Action Plan Tracker & Surveillance Assessments section adapted to make it less prescriptive Additional wording included outlining the 6 month check of the FIP by MarinTrust New section to include FAP extension requirements Removal of information for site visits to the fishery 	IPAC
2021	V2.1	References to MarinTrust QMS documents added to text	IPAC
April 2022	V2.2	Updated all website links to new website and QMS document references. General text updates.	GBC
April 2022	V2.2	Wording about stakeholder engagement, roles and expectations strengthened. This also includes the role that MarinTrust will play or not.	GBC
April 2022	V2.2	Process flow diagram updated	GBC
August 2022	V2.2	<p>Wording updated in line with IP review recommendations including:</p> <ul style="list-style-type: none"> -less specific wording around FIP stakeholder changes 	GBC

		-Wording related to stakeholder types, contribution to the IP and MarinTrust’s role in the process.	
December 2022	V2.2	Additional details added about approval of MarinTrust Improver Programme Assessors.	GBC
December 2022	V2.2	Additional details about IP recognition for different stakeholders	GBC
December 2022	V2.2	Details about FisheryProgress.org removed	GBC
December 2022	V2.2	Peer Review template for FIP progress reporting added to Annex 2.	GBC
April 2023	V2.2	Guidance for marine ingredient production factories added	GBC