



MarinTrust Standard for Responsible Supply of Marine Ingredients

Mapping clauses from V2 to V3

Version 1.0

Issued January 2024

This document provides a summary of the changes between the MarinTrust Standard for Responsible Supply of Marine Ingredients Version 2.0 (effective July 2017) and Version 3.0 (effective May 2024).

The following tables include Version 2.0 sections 1 to 7 and the respective clauses. Against each Version 2 clause, it is documented whether the clause has been retained, modified or removed in Version 3:

- **Retained:** the clause remains as it was in V2.
- **Modified:** the clause in V2 has been modified for V3.
- **Removed:** the clause is no longer included in V3.

In case of any inconsistencies or discrepancies in this document, the online versions (in PDF format) will prevail.

Further information

Further information regarding application, rules and regulations of the programme can be obtained from MarinTrust and/or the approved certification bodies listed on the MarinTrust website.

Section 1 Responsible Sourcing Practices

Clause number / clause		Retained, modified, removed	Section in V3	Equivalent clause/s in V3
1.1	Principles of Responsible Sourcing of Fishery Material			
	MarinTrust subscribes to and promotes the principles of the FAO Code of Conduct for Responsible Fisheries through the development and adoption of this Program.	Removed	n/a	n/a
	Through its voluntary adoption, MarinTrust Certificate holders will further demonstrate their commitment to supporting the principles of sustainable fisheries development.	Removed	n/a	n/a
	In order to become certified, Applicants shall demonstrate that they are sourcing raw materials from responsibly managed fisheries as defined in the 1995 UN FAO Code of Conduct for Responsible Fisheries and as described in this Standard.	Modified	1	1.1
	Applicants should refer to section 1.3 for the key requirements of responsibly managed fisheries.	Removed	n/a	n/a
	In this Standard to comply with the definition of Responsible Sourcing, the Applicant shall be able to demonstrate:	Modified	1	1.1
	<ul style="list-style-type: none"> • The responsible sourcing of legal, regulated and reported fishery material and avoidance of material sourced from IUU fishing activity. 			
	<ul style="list-style-type: none"> • Sourcing from fisheries that comply with the key requirements of the FAO Code of Conduct for Responsible Fisheries. 			
	<ul style="list-style-type: none"> • N.B. The assessment does not allow a fishery to make any claim against this Standard. 			
1.2	Responsible Sourcing Policy			
1.2.1	The Applicant shall implement a documented Policy that commits them to the responsible sourcing of fishery material in accordance with this Standard.	Modified	2	2.3
1.2.2	The Applicant shall be permitted to use MarinTrust approved raw material in their scope if they have been granted this approval by MarinTrust Ltd.	Replaced	1	1.2 and 1.3
1.2.3	The Applicant shall be only permitted to use MSC Certified raw material in their scope if they have a documented process in place to confirm the MSC Certified status of these raw materials upon receipt.	Replaced	1	1.2 and 1.3

1.2.4	<i>Where an applicant can demonstrate that they are sourcing from a fishery with valid MSC Certification the material will be automatically approved.</i>	Replaced	1	1.2 and 1.3
1.3	Responsible Sourcing of Fishery Raw Material			
The following clauses are derived from Articles 7 and 8 of the FAO Code of Conduct for Responsible Fisheries. Applicants shall be able to demonstrate directly, or through an approved, independent, and competent third party that each fishery that they source material from is compliant with the following criteria.		This whole section has been replaced. The requirements are in the whole fish fishery raw material approval requirements, which is a pre-requisite.		
1.3.1	The Fishery Management Framework and Procedures			
1.3.1.1	The management framework, system, or customary arrangement for the fishery shall include a legal, administrative, and scientific basis for the development and implementation of measures and controls to support the conservation of the species, ecosystems and environments directly and indirectly affected by the fishery.			
1.3.1.2	Stock assessments, management procedures and management outcomes shall be developed in consultation with stakeholders and made publicly available.			
1.3.1.3	There shall be systems and organisations in place to implement effective surveillance, control and enforcement programmes, and to apply sanctions when fishery laws and regulations are broken			
1.3.2	Stock Assessment Procedures and Management			
1.3.2.1	Species which together make up at least 95% of total landings by weight shall meet the following requirements, OR there shall be strong evidence that the fishery is not putting the species at risk of over-exploitation:			
1.3.2.1.1	There shall be sufficient scientific information collected to enable informed and responsible management of all stocks.			
1.3.2.1.2	Stock assessments shall be conducted with sufficient frequency to permit the informed management of the stock; shall take into account the best available scientific information and shall consider the entire biological stock.			
1.3.2.1.3	There is a mechanism in place by which total fishing mortality can be controlled, and this mechanism is effective at maintaining fishing mortality within the levels recommended by scientific organisations.			
1.3.2.1.4	Reference points (or proxies) are established for the stock, and the fishery is closed if the stock is			

	determined to have fallen below the biomass limit reference point (or proxy).			
1.3.2.2	Any other species regularly caught by the fishery, and raw materials sourced from by products, shall meet the following requirements:			
1.3.2.2.1	If the species is from a stock managed using reference points, the stock shall be within the defined limit reference point(s).			
1.3.2.2.2	There shall be strong evidence that the fishery is not putting the species at risk of over-exploitation.			
1.3.2.3	None of the species approved for use as an MarinTrust raw material shall appear in the CITES appendices or be categorised by the IUCN as Endangered or Critically Endangered.			
1.3.3	Fishery Impacts			
1.3.3.1	The fishery management system shall monitor the impacts of the fishery on ETP species and minimise these impacts to the extent practicable. The fishery shall not have a significant negative effect on ETP species or place them at serious risk of extinction.			
1.3.3.2	The fishery management system shall monitor the impacts of the fishery on the physical environment and minimise these impacts to the extent practicable. The fishery shall not have a significant negative effect on the physical environment.			
1.3.3.3	The fishery management system shall monitor the impacts of the fishery on aquatic ecosystems and minimise these impacts to the extent practicable. The fishery shall not have a significant negative effect on aquatic ecosystems.			
1.4	Reporting and Recording of Fishery Raw Materials			
	Each delivery of fishery material shall meet the following criteria in order for it to be eligible for use as approved raw material.	Modified	3	3.1
1.4.1	Whole Fish Fishery material shall be traceable to a fishery/fisheries approved as compliant to the MarinTrust Standard or certified to the MSC Standard, to be eligible for identification of MarinTrust	Modified	3	3.2.1
1.4.2	All whole fish fishery landings received by the Applicant shall be recorded and verified.	Modified	3	3.2.5
1.4.3	All raw materials shall only be sourced from legal, reported and regulated fishing activity.	Modified	3	3.2.4
1.4.3.1	Applicants shall provide evidence that their raw material is sourced from vessels that are not officially listed as engaging in illegal, unreported and unregulated (IUU) fishing activity.	Modified	3	3.2.4

1.4.3.1	The details of each consignment of fish from a vessel shall be recorded.	Existing	3	3.2.5
	This shall include:	Existing	2 and 3	various
	I. Name of vessel, IMO/registration number, call sign, legal owner, name and address,	Existing	2	2.11.2.2
	II. Proof of authorisation to engage in the specific fishing activity,	Existing	2	2.11.2.2
	III. Date and time of discharge to facility,	Existing	3	3.2.5
	IV. Species and quantity discharged,	Existing	3	3.2.5
	V. Location or place(s) and dates of fishing activity where catch originated,	Existing	3	3.2.5
	VI. Fishing method used.	Existing	2	2.11.2.2

Section 2: Responsible Traceability Practices

Clause number / clause		Retained, modified, removed	Section in V3	Equivalent clause/s in V3
2.1	Traceability of Marine Ingredients to Fishery			
2.1.1	Applicants shall have a system in place to ensure that the production of compliant marine ingredients can be traced back to an approved fishery material. Where an Applicant is processing fishery material which originates from a fishery in the MarinTrust Improver Programme, the system shall also be able to trace this material as separate from MarinTrust approved material.	Modified	4	4.1
2.1.2	Applicants shall implement procedures that demonstrate the avoidance of raw materials that are sourced from Illegal, Unreported and Unregulated (IUU) fishing activity.	Removed	n/a	n/a
2.1.3	Applicants which produce marine ingredients that meets the requirements of this MarinTrust Standard shall have a system in place to keep it separate from marine ingredients that is produced from non-approved raw material. Applicants which produce marine ingredients using raw materials which originate from a fishery in the MarinTrust Improver Programme shall have a system in place to keep this separate from both fully approved and non-approved materials.	Modified	4	4.3
2.1.4	All compliant MarinTrust marine ingredients shall be identifiable with a defined positive batch identification system in order to be eligible for identification as compliant with the MarinTrust Standard.	Modified	4	4.2.2
2.1.5	Where the identity of eligible material is lost, (e.g. through mixing with ineligible material) or there is a potential loss in identity through loss in traceability, the subsequent batch shall no longer be identified as compliant with the MarinTrust Standard.	Modified	2	2.7.1 and 2.7.2
2.1.5.1	The Applicant shall conduct a mass balance yield exercise every year to test and record the amount of marine ingredients derived from each raw material category.	Modified	4	4.5
2.1.6	Applicants shall test the effectiveness of their batch control and traceability systems through a detailed documented internal audit conducted no less than once per annum for all marine ingredients.	Modified	2	2.6
2.1.7	The internal audit shall include:			

2.1.7.1	Traceability of fishery material supply - Supplier Traceability.	Modified	2	2.6.2 and 4.2.2
2.1.7.2	Traceability of raw fishery material to finished product as it moves through processing and all storage stages (including external and third-party storage) - Process Traceability.	Modified	2	2.6.2 and 4.2.3
2.1.7.3	Traceability of MarinTrust compliant marine ingredients to immediate customers Customer Traceability.	Modified	4	4.3
2.1.7.4	The outcome of internal traceability audits shall be documented and shall include evidence of performance through compliance reports, non-conformances, corrective and verification actions.	Modified	2	2.6.3
2.1.8	Applicants shall inform the Certification Body in the event of a recall within 48 hours of any dispatched compliant MarinTrust marine ingredients.	Modified	2	2.7.4
2.1.9	Applicants shall perform 1 recall exercise every 12 months and whenever necessary.	Modified	2	2.8
2.2	Record Keeping			
2.2.1	Applicants shall ensure that all records required by this Standard are kept for a minimum of three years.	Modified	2	2.4.3
2.2.2	All records required to verify compliance with the MarinTrust Standard shall be accurate, legible and unadulterated.	Modified	2	2.4.4

Section 3: Responsible Manufacturing Practices

Clause number / clause		Retained, modified, removed	Section in V3	Equivalent clause/s in V3
3	MarinTrust recognises that a high standard of responsible manufacturing should be demonstrated for certification to the Responsible Sourcing Standard. Applicants may demonstrate Responsible Manufacturing Practices by achieving and maintaining certification to the GMP+ Feed Certification scheme or recognised equivalent, or a Standard that has been approved by the MarinTrust Governance Board as being an equivalent.	Modified	5	5
	Applicants demonstrating Responsible Manufacturing Practices via a separate certification shall also meet the other requirements of Section 3.1.	Modified	5	5.1
	Factories without such a certification shall meet the requirements of Sections 3.2 – 3.7.	Modified	5	5.2
3.1	Factories certified to GMP+ or recognised equivalent, or to a Standard approved as equivalent by the MarinTrust GB			
3.1.1	Certification shall be administered by either an ISO 17065 accredited Certification Body included in their accreditation scope by a member of the IAF Multilateral Agreement (MLA) or by a standard certification process that has been approved by the MarinTrust Governance Board as being an equivalent.	Modified	5	5.1.1
3.1.2	Current and valid certificates shall be available for each site registered on the MarinTrust Application Form that wishes to be certified to the MarinTrust Standard.	Modified	5	5.1.2
3.1.3	The outcome of external inspection and surveillance audits to the GMP+ or equivalent standard shall be made available including; reports of the performance, outcome, non-conformances, and corrective actions associated with assessments conducted by the appointed Certification Body.	Modified	5	5.1.3
3.1.4	If applicable, Applicants that produce fish oil that is destined for direct human consumption shall have incorporated a specific HACCP plan to cover and control all the risks associated with this type of Fish Oil production.	modified	5	5.4
3.2	Factories without certification to GMP+ or to an approved equivalent Standard			
	Applicants without certification to GMP+ or equivalent shall meet the following requirements	modified	5	5.2

	(3.2.1 – 3.2.18). Applicants with such certification (as described in section 3.1, above) do not need to meet requirements 3.2.1 –3.2.18.			
3.2.1	Structure and Facilities			
3.2.1.1	Facilities and equipment shall be designed to allow appropriate cleaning and disinfection and managed to avoid risks to the safety of raw materials and marine ingredients.	retained	5	5.3.1.1
3.2.1.1.1	Facilities and equipment shall be designed to allow appropriate cleaning and disinfection and managed to avoid risks to staff safety.	Modified	5	5.3.1.1
3.2.1.2	Facilities shall be designed to reduce the risk of contamination of raw material from semi and processed marine ingredients material particularly post critical control process points designed to eliminate microbiological hazards in the marine ingredient's material.	retained	5	5.3.1.3
3.2.1.3	Access to processing facilities and storage areas shall be organised to prevent cross contamination of processed materials from personnel operating in raw and semi-processed areas.	Modified	5	5.3.7
3.2.1.4	There shall be adequate lighting to ensure activities can be undertaken safely and efficiently.	Modified	5	5.3.1.4
3.2.1.5	Protective clothing shall be worn where the applicant has determined that there is a risk from personnel to marine ingredients ingredient contamination.	Modified	5	5.3.9.1
3.2.1.5.1	Protective clothing shall be worn where the applicant has determined that there is a risk to personnel health and safety.	Modified	5	5.3.9.1
3.2.2	Intake of Raw Fishery Material			
3.2.2.1	Holds, containers and equipment of receiving vessels and overland transporters used for fishery raw materials shall be maintained in a clean and hygienic condition.	retained	5	5.3.2.1
3.2.2.2	There shall be adequate facilities to receive, off-load and store fishery raw material from vessels and overland transportation before processing to prevent contamination and risk to marine ingredients safety.	retained	5	5.3.2.2
3.2.2.3	Intake facilities shall be designed to ensure that access by birds and other ground pests is eradicated.	Modified	5	5.3.6.1
3.2.2.4	Dosing systems for additive inclusion shall be calibrated by competent persons and provide the correct and effective dosing levels for these approved additives at all times.	Modified	5	5.3.6.9

3.2.2.5	For bulk transported material, internal procedures and contractual agreements shall include provisions that preclude the use of transport that may adversely affect the safety of any raw materials due to the composition of a previous cargo.	Modified	5	5.3.3.5
3.2.3	Maintenance and Contractors			
3.2.3.1	There shall be a preventative maintenance programme in place for the facility.	retained	5	5.3.6.6
3.2.3.2	All lubricants and oils shall be stored in a designated non-production or non-product storage area to prevent a risk of contamination of marine ingredients materials.	retained	5	5.3.6.7
3.2.3.3	There shall be procedures in effect for visitors and subcontractors to ensure the integrity of the product based on risk assessment.	Modified	5	5.3.9 and subclauses
3.2.4	Process Control Arrangements			
3.2.4.1	All conveying, piping, storage tanks, bins and processing containers shall be made of smooth, impervious, non-toxic, materials and managed to reduce the risk of product contamination.	Modified	5	5.3.1.2
3.2.4.2	Water used in or associated with the process shall be of potable quality.	retained	5	5.3.5.1
3.2.4.3	Water dosing systems used to ensure potable quality, water softening, or anti-corrosion of equipment shall be calibrated and controlled to ensure the correct level of dosing of additives.	retained	5	5.3.5.3
3.2.4.4	Checks on dosing rates, calibration and control shall be recorded and maintained.	Modified	5	5.3.6.9
3.2.4.5	All additives to water shall be authorised and shall not pose a risk to marine ingredients safety by their application.	modified	5	5.3.5.2
3.2.4.6	Fixtures in process and storage areas that contain glass shall be protected to minimise the risk of contamination in the event of breakage.	Modified	5	5.3.1.5
3.2.4.7	Where mechanical drying of marine ingredients is undertaken, documented procedures shall ensure that it does not cause adverse effects on the marine ingredient safety.	retained	5	5.3.5.4
3.2.4.8	In cases where air is used for conveying or cooling, the participant shall evaluate the risk of this becoming a contamination route for pathogens and take any necessary precautions.	Modified	5	5.3.5.5
3.2.4.9	Procedures shall include corrective actions to be taken in the event of critical process parameters being breached.	Modified	2	2.9

3.2.3.10	The production process shall have systems in place to reduce the risk of physical contamination from potential physical contaminants such as metal.	Modified	5	5.3.1.5
3.2.5	Hygiene, Cleaning, and Disinfection			
3.2.5.1	There shall be thorough cleaning of all equipment and facilities to prevent contamination from pathogens, pests and dirt and foreign material.	retained	5	5.3.8.1
3.2.5.2	Cleaning and disinfectant products shall not pose a risk to marine ingredients material contamination through their proper dilution, application and the use of secure storage.	Modified	5	5.3.8.2
3.2.5.3	Cleaning and disinfectant products shall not pose a risk to staff safety through their proper dilution, application and the use of secure storage.	Modified	5	5.3.8.2
3.2.5.4	The cleaning programme shall be documented for each major item of equipment and process area (reception, pumping, raw material storage, processing, storage, bagging, loading and dispatch).	Modified	5	5.3.8.3
3.2.5.5	Accurate records of cleaning activity and checks on efficacy shall be maintained.	Modified	2	2.4.3
3.2.6	Pest Control			
3.2.6.1	An effective and continuous programme for the control of pests (including insects), which has an emphasis upon pest proofing and provision of a hostile environment, shall be maintained.	Modified	5	5.3.6.1
3.2.6.2	The Applicant shall either contract the services of a regulated pest control organisation, or shall have trained in company personnel, for the regular inspection and treatment of their premises to deter and eradicate infestation.	Modified	5	5.3.6.2
3.2.6.3	Detailed records of the location of bait stations, poisons, pest control inspections, recommendations and necessary action undertaken shall be retained.	Modified	2	2.4.3
3.2.7	Waste Management			
3.2.7.1	All waste materials shall be stored in dedicated containers, held in separate areas so as to prevent contamination of marine ingredients materials or pest infestation.	retained	5	5.3.6.3
3.2.7.2	There shall be adequate internal drainage contamination to maintain a clean work area and minimise health and safety risks.	retained	5	5.3.6.4
3.2.7.3	Facility sewerage shall be contained by a separate closed system to that of the processing drainage system.	retained	5	5.3.6.5

3.2.8	Packaging and Labelling			
3.2.8.1	Packaging shall be designed to protect fishmeal during normal storage, handling and delivery conditions.	Modified	5	5.4.1.1
3.2.8.2	For marine ingredients sold in bulk, as well as in bags, delivery documents / labels shall include any details (such as Statutory Statements) required under Labelling Regulations in the country of production and / or receipt.	retained	5	5.4.1.2
3.2.9	Storage Facilities			
3.2.9.1	Fishmeal stores shall be designed, constructed and managed to prevent product contamination.	modified	5	5.3.3.1
3.2.9.2	Storage facilities shall be dry, adequately ventilated to prevent condensation and reduce the risk of dirt and dust contamination.	modified	5	5.3.3.1
3.2.9.3	Vehicles used to load and unload bulk stores shall be used solely for that purpose and managed through proper maintenance and hygiene to prevent contamination of product.	retained	5	5.3.3.2
3.2.9.4	Environmental analysis for salmonella sp. shall be carried out in fishmeal storage areas according to the HACCP based risk assessment.	Modified	5	5.3.8.4
3.2.10	Loading and Transport			
3.2.10.1	Transport (vessel holds, road/rail containers) shall be adequately controlled through hygiene procedures, inspection checks and records at loading with specific regard to cleanliness and absence of moisture or potential contamination.	retained	5	5.3.3.4
3.2.10.2	Where the conditions of transport may present a risk to contamination, loading shall not take place until a thorough risk assessment, appropriate tests and corrective action have taken place to ensure that marine ingredients shall not be adversely affected.	retained	5	5.3.3.6
3.2.10.2.1	The results of these mitigating activities shall be recorded.	removed	n/a	n/a
3.2.10.3	The participant shall ensure that all intake and loading facilities are designed and constructed in a manner that maintains the safety of marine ingredients materials.	Modified	5	5.3.2.1
3.2.10.4	Loading shall not be carried out in conditions which will adversely affect the raw materials or marine ingredients materials being handled (e.g. inclement weather conditions).	retained	5	5.3.3.3
3.2.10.5	For bulk transported material, internal procedures and contractual agreements shall include provisions that preclude the use of transport that may adversely affect the safety of any marine	Modified	5	5.3.3.5

	ingredients' materials due to the composition of a previous cargo.			
3.2.11	Hazard Analysis Critical Control Point (HACCP) systems			
3.2.11.1	Applicants shall establish and maintain an effective Hazard Analysis Critical Control Points system (HACCP) specific to their own premises and appropriate to the nature and volume of the production to cover all marine ingredients production.	<p>This whole section has been replaced by section 5.4 and sub-sections</p>		
3.2.11.2	Formal procedures that control potential hazards on a site-wide basis, such as: pest control, cleaning, glass policies, training, raw material and marine ingredients ingredient specifications, etc., commonly referred to as prerequisites shall be in place prior to the establishment of the HACCP plan.			
3.2.11.3	<p>The HACCP plan shall be based on an assessment of risk and shall identify which hazards are of such a nature that their elimination or reduction to acceptable levels is essential to the safe production of marine ingredients. In conducting the hazard analysis, the following should be taken into consideration:</p> <ul style="list-style-type: none"> • The likely occurrence of hazards and severity of their adverse health effects on consumer. • The qualitative and/or quantitative evaluation of the presence of hazard. • Survival and multiplication of micro-organisms of concern. • Conditions leading to the above. 			
3.2.11.4	If applicable, Applicants that produce fish oil that is destined for direct human consumption shall have incorporated a specific HACCP plan to cover and control all the risks associated with this type of Fish Oil production.			
3.2.12	HACCP Principles			
3.2.12.1	Conduct a hazard analysis assessment on the operation.			
3.2.12.2	Determine the Critical Control Points (CCP's) in the system.			
3.2.12.3	Establish Critical Limits for the critical control points identified.			
3.2.12.4	Establish a system to monitor control of the CCPs.			
3.2.12.5	Establish the corrective actions to be taken when monitoring indicates that a particular CCP is not under control.			
3.2.12.6	Establish procedures of validation to confirm that the HACCP System is working effectively.			

3.2.12.7	Establish documentation concerning all procedures and records appropriate to these principles and their application.
3.2.12.8	In formulating the HACCP plan, reference shall be made to relevant legislation or guidelines.
3.2.12.9	HACCP shall have senior management commitment and shall be implemented through agreed procedures. Reference to requirements for product safety shall include any measures identified in the HACCP.
3.2.12.10	The HACCP team leader or nominated team representative shall be able to demonstrate competence in the understanding of HACCP principles and their application.
3.2.12.11	Key personnel identified as HACCP Team members shall have appropriate training, product and process knowledge and experience.
3.2.12.12	All existing and new products shall be covered by the HACCP System, which shall be appropriately reviewed.
3.2.12.13	Through the HACCP System, the Company shall be able to demonstrate effective control of all operations critical to food safety.
3.2.12.14	The HACCP Team shall carry out regular reviews (at least annually) to verify that requirements of the HACCP plan are being met in practice and that the plan effectively and consistently ensures that the applicant produces safe marine ingredients materials.
3.2.13	HACCP Internal Auditing
3.2.13.1	The Applicant shall audit all HACCP and prerequisite systems, procedures and specifications critical to product safety, legality and quality as part of the Internal Audit Procedures.
3.2.14	HACCP Documentation and Records
3.2.14.1	Data used in the hazard analysis.
3.2.14.2	Specification of product and materials used.
3.2.14.3	Monitoring procedures for CCP's.
3.2.14.4	CCP monitoring records physically or electronically signed and dated by responsible person.
3.2.14.5	Results of Internal (and external) Audit reports, non-conformances and corrective actions and minutes produced at meetings.
3.2.14.6	A record shall be kept of HACCP reviews showing the HACCP Team findings and any actions implemented.

3.2.14.7	A document control procedure shall be in place for all HACCP documentation.			
3.2.15	Marine ingredients Specifications			
3.2.15.1	Each marine ingredient product shall have a written specification that is made available to purchasers and potential purchasers of the marine ingredient's materials offered by the participant.	Modified	5	5.4.1.3
3.2.15.2	The Specification shall confirm whether the marine ingredient is a compliant MarinTrust material.	retained	5	5.4.1.4
3.2.16	Inspection, Sampling and Analysis			
3.2.16.1	Applicants shall have representative inspection regimes in place that ensure the safety of all raw materials on arrival and marine ingredients on despatch.	retained	5	5.3.10.1
3.2.16.2	Inspections shall include, as appropriate, assessment of physical form; odour; contamination by insect pests, droppings and other extraneous matter; mould; and compliance with specification.	retained	5	5.3.10.2
3.2.16.3	Samples of the finished materials shall be labelled to facilitate traceability and retained in appropriate conditions for a minimum period of six months.	retained	5	5.3.10.3
3.2.16.4	Applicants shall undertake sampling and analysis of marine ingredients to establish that it meets the statutory standards for the permitted concentration of an additive such as antioxidants.	retained	5	5.3.10.4
3.2.16.5	The sample and testing plan shall be based on a HACCP based risk assessment for undesirable substances.	retained	5	5.3.10.5
3.2.16.6	Where results fall outside of expected range, non-conforming product shall be identified, separated and where appropriate, disposed of in a legal manner.	Modified	2	2.7.2
3.2.16.7	Records shall be available to document the final disposition of any non-conforming material.	Modified	2	2.4.3
3.2.16.8	Testing laboratories shall be approved by one or more of the following methods:	retained	2	2.13
	I. Accreditation by a nationally recognised accreditation authority according to EN/ISO-17025 for the test under consideration;	retained	2	
	II. Validation by taking part in relevant ring tests.	retained	2	
3.2.17	Calibration of Measuring Equipment			

3.2.17.1	All inspection, measuring and test equipment used to confirm that raw, in process and finished marine ingredients materials meet specified marine ingredients safety requirements shall be calibrated at intervals not exceeding 12 months.	retained	5	5.3.6.8
3.2.17.2	Records of calibration shall be maintained.	Modified	2	2.4.3
3.2.18	Assessment of Suppliers	This section is replaced by section 2.11 and all subclauses		
3.2.18.1	Applicants shall ensure that supplies of additives and technical processing aids are included in the risk-based assessment according to HACCP principles.			

Section 4: Fish by-products

Clause number / clause in V2		Retained, modified, removed	Section in V3	Equivalent clause/s in V3
This section permits the inclusion of fish products in fishmeal or fish oil from fish processing and/or aquaculture as raw material on the basis that, where applicable the applicant is also in compliance with the preceding relevant clauses contained in this Standard.		Modified	3	3.3.2.1
4.1	Raw Fishery Materials from Fish By-products produced during processing			
4.1	Raw material originating from fish processing operations may only be used to produce fishmeal or fish oil if it meets the following criteria:	Modified	3	3.3.2.2
4.1.1	The Fish By-product shall come from fish that is intended for human consumption. The applicant shall have a document policy stating this.	Modified	3	3.3.2.2
4.1.2	The Fish By-product shall not be of a species which is categorised by the IUCN Red List as Endangered or Critically Endangered (or higher), or of a species which appears in the CITES appendices.	This whole section is replaced by the by-product assessment methodology. This is a pre-requisite.		
4.1.3	If the stock from which the by-product is sourced is managed using reference points, the stock shall be considered to be above the limit reference point, or removals by the fishery under assessment considered negligible.			
4.1.4	If the stock from which the by-product is sourced is not managed using reference points, and the species is categorised as vulnerable via a PSA, the impacts of the fishery on the species shall be considered during the management process, and reasonable measures shall be taken to minimise these impacts.			
4.1.5	The Fish By-product shall meet and be handled according to the requirements of the GMP+ or equivalent certification programme that is recognised by the MarinTrust GB and in compliance with clause 3.2.2.5, which include: no contamination with Land Animal Protein (LAP), chemical, biological or physical agents			
4.1.6	The Applicant shall be able to trace the origin of material back to the supplying fish processor or handler and by species or mix of species included in the receiving batches.	Modified	3	3.3.2.2
	• Records of the above shall be maintained (4.1.1, 4.1.5 + 4.1.6)	Modified	2	2.4.3

4.2	Raw Fishery Materials from Aquaculture	
4.2	Raw material originating from aquaculture production may only be used to produce fishmeal or fish oil if it meets the following criteria:	This section is replaced by section 3.3.3 and all subclauses
4.2.1	They shall show no clinical signs of disease on the day of receipt (EU Reg 1774/2002).	
4.2.2	They shall not come from a farm which is subject to a prohibition for animal health reasons and shall not have been in contact with animals from such a farm.	
4.2.3	They shall be kept segregated and clearly labelled as marine ingredients of the species that they originate from including circumstances where they are mixed with other raw materials both before and post processing (EU Reg 811/2003).	

Section 5: Social accountability

Clause number / clause from V2		Retained, modified, removed	Section in V3	Equivalent clause/s in V3
5.1	The Applicant shall have a documented policy that demonstrates compliance with their national legislation to ensure that their marine ingredient products are manufactured in compliance to all relevant employment, welfare and safety requirements as stated in this section. If no legislation is documented by their national government the applicant will need to have its own policies to comply with all the requirements of this section.	Modified	2	2.3.1
5.2	The Applicant shall have a written policy on fair operating practice, which is made available to managers and key personnel of the company. At a minimum, this shall cover bribery, corruption and inappropriate political lobbying or contributions.	Modified	2	2.3.1
5.3	The Applicant shall ensure that all staff have the correct visa/work permit to comply with their current national employment regulations.	Modified	7	7.6.1
5.4	The Applicant shall conduct a documented annual self-assessment against all relevant social laws. All non-compliance shall be documented, with action plans to address and monitor the non-compliance.	Modified	7	7.2
5.5	The Applicant shall have a procedure stating how to record health and safety related accidents and incidents with the associated corrective actions available to employees. As a minimum, this shall cover the process to record the incident in a database and to take corrective action.	Modified	7	7.5.3
5.6	The Applicant has documentation available which demonstrates that a clearly identified, named employees' representative and / or an employees' council representing the interests of the employees to the management is elected, or appointed or nominated by all employees and recognised by the management. This person shall be able to communicate complaints to the management.	modified	7	7.9.2
5.7	An Applicant shall have a complaint procedure in existence, the employees have been informed about its existence that complaints or suggestions can be made.	Modified	7	2.10.2
5.7.1	The complaint procedure shall specify a time frame to resolve complaints.	Modified	7	2.10.2

5.7.2	Complaints and their solutions from the last 3 years are documented and accessible.	Modified	2	2.4.3
5.8	The Applicant can document that the management and the employees' representative have signed and displayed a self-declaration assuring good social practice and human rights of all employees.	retained	7	7.1.1
5.8.1	The employees have been informed about the self-declaration and it is reviewed at least every 12 months years and whenever necessary.	retained	7	7.1.2
5.9	The Applicant can demonstrate that the responsible person for workers' health and safety and the employees' representative(s) have knowledge and/or access to national regulations concerning gross and minimum wages, working hours, union membership, anti-discrimination, child labour, labour contracts, holiday and maternity leave, medical care and pension/gratuity.	Modified	7	7.3
5.10	The Applicant shall have a contract for each employee containing the following:	retained	7	7.6.2
5.10.1	Both the employees as well as the employer have signed them.	retained	7	7.6.3
5.10.2	Records contain at least full names, nationality, a job description, date of birth, the regular working time, wage and the period of employment.	retained	7	7.6.4
5.10.3	Records of all employees (also subcontractors) shall be accessible for at least 3 years.	Modified	7	2.4.3
5.11	The Applicant can show adequate documentation of the salary transfer (e.g. employee's signature on pay slip, bank transfer).	Modified	7	7.7.2
5.11.1	Employees sign or receive copies of pay slips / pay register that make the payment transparent and comprehensible for them.	removed	7	
5.11.2	Regular payment of all employees during the last 3 years is documented.	modified	7	7.7.3
5.12	The Applicant can document that wages and overtime payment are documented on the pay slips / pay registers indicate compliance with legal regulations (minimum wages) and/or collective bargaining agreements (if applicable).	Modified	7	7.7.6
5.12	If payment is calculated per unit, employees shall be able to gain at least the legal minimum wage (on average) within regular working hours.	Modified	7	7.7.4
5.13	The Applicant can show records indicating compliance with national legislation regarding minimum age of employment.	retained	7	7.8.1

5.13.1	If not covered by national legislation, children below the age of 15 are not employed.	retained	7	7.8.2
5.13.2	If personnel between the ages of 15 to 18 are hired part time, they are not engaged in work that is dangerous to their health and safety that jeopardises their development or prevents them from finishing their compulsory school education.	Modified	7	7.8.3
5.14	The Applicant shall demonstrate that they have communicated with their raw material suppliers the national social regulation requirements.	Modified	2	2.11.1.2

Section 6: Environmental Accountability

Clause number / clause from V2		Retained, modified, removed	Section in V3	Equivalent clause/s in V3
6.1	The Applicant shall have a documented policy that demonstrates compliance with their national legislation to ensure that their marine ingredients products are manufactured in compliance to all relevant environmental requirements as stated in this section. If no legislation is documented by their national government the applicant will need to have its own policies to comply with all the requirements of this section.	Modified	2	2.3.1
6.2	The Applicant shall provide copy of permits (when applicable) for environmental emissions regulations as the legislation relates to:	retained	8	8.1.1
	• Emissions to air	modified		
	• Discharge to water	retained		
	• Release of toxic or hazardous substances	retained		
	• Noise, smell and dust pollution	retained		
• Ground pollution	retained			
6.3	The Applicant shall provide documentation in order to demonstrate compliance with the requirement specified in permits from 6.2. In the case of non-compliance, all non-compliance shall be documented, with action plans to address and monitor the non-compliance.	Modified	8	8.1.2
6.4	The Applicant shall have a written assessment that identifies relevant environmental issues and the provisions made to address the associated risks have been conducted.	modified	8	8.2.1
6.4.1	Management is able to demonstrate awareness of the identified issues and the provisions made to address the associated risks.	retained	8	8.2.2

Section 7: Community engagement

Clause number / clause from V2		Retained, modified, removed	Section in V3	Equivalent clause/s in V3
7.1	The Applicant shall have a written evaluation of the potential impacts of direct operations on the local community.	Modified	7	7.11.1
7.1.1	There shall be documentation showing the measures taken to avoid, mitigate and/or compensate for negative impacts on the local community.	Modified	7	7.11.1
7.2	There shall be documentation showing the involvement in regular engagement with local community representatives and organizations.	Modified	7	7.11.2
7.3	There shall be records of community complaints and the associated corrective action taken to address their concerns.	Modified	2	2.10.3