

FEBRUARY 2024

IMPACT EVALUATION

Do MarinTrust activities
lead to improved or
protected environmental
parameters?

Report by

NATURAL JUSTICE
LEGAL PARTNER FOR
SUSTAINABLE SEAFOOD

Acknowledgements

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About Natural Justice Consulting

Natural Justice Consulting is an independent organisation committed to empowering seafood organisations in their missions towards sustainable seafood. Natural Justice aims to simplify complexities and assist organisations in reaching objectives of international sustainability treaties and guidelines.

Natural Justice was commissioned in June 2023 to complete an Impact Evaluation of MarinTrust following the selection of their proposal after [MarinTrust's Call for Proposals](#)

About MarinTrust

MarinTrust is an international third-party certification programme for marine ingredients that champions best practice in fisheries and production of marine ingredients (fishmeal and fish oil), by enabling producers to demonstrate that their marine ingredients are responsibly sourced and produced.

The MarinTrust Standard sets out the practices that a producer must conform to for its marine ingredients to be recognised as responsibly sourced and produced. MarinTrust also has a Chain of Custody Standard, for businesses involved in further processing (packing, repacking, refining etc) of products derived from MarinTrust-certified marine ingredients. MarinTrust also operates the MarinTrust Improver Programme (IP). The MarinTrust Improver Programme is dedicated to marine ingredient production factories involved in a Fishery Improvement Project (FIP). Through a structured, timebound process, they can develop and gain recognition for their sourcing of marine ingredients, while working towards certification.

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INTRODUCTION

Natural Justice Consulting is pleased to present the report resulting from our independent Impact Evaluation conducted between June 2023 and February 2024 on the impact made by **MarinTrust**. This Impact Evaluation examines the impact made through the **(1) MarinTrust Factory Standard** (version 2.0, 2017) and the **(2) MarinTrust Improver Programme**. Adhering to the recommendations on good practices of the **ISEAL Impacts Code** [1], this in-depth evaluation aims to provide MarinTrust with insights into the extent to which their activities catalyse the desired environmental changes, while also uncovering underlying factors influencing whether they succeed or not.

Central to our evaluation is the testing of the hypothesis: *“MarinTrust activities lead to improved or protected environmental parameters”*. It is essential to mention that our evaluation exclusively focuses on environmental parameters, thus omitting MarinTrust’s activities related to food safety and social responsibility from its scope.

[1] Clause 8.5 and 8.7 of the ISEAL Impacts Code (version 2.0, December 2014)

About the MarinTrust **Factory Standard**

The MarinTrust Standard ensures the following:

- Marine ingredients come from non-IUU fisheries that are managed in accordance with the FAO Code of Conduct for Responsible Fisheries.
- Production is carried out to high standards of safety and quality, with sufficient care given to the environment, workforce, and local community.

Certification against the MarinTrust Standard is achieved through rigorous factory audits and fisheries assessments, and maintained through annual surveillance audits. This work is undertaken wholly by independent Certification Bodies, which are ISO compliant and approved by MarinTrust. Certified factories are permitted to use the unique certification mark “MarinTrust Certified” to signify compliance and commitment to the MarinTrust Standard.

Although the unit of certification is the factory, assessment of the raw material species is a necessary prerequisite in order to provide assurance for the responsible sourcing of raw materials used for the production of marine ingredients.

About the MarinTrust Improver Programme

The MarinTrust Improver Programme (IP) is a structured, timebound process, through which marine ingredient production factories sourcing from improving fisheries (i.e. Fishery Improvement Projects) can gain recognition of their production. It is not a standard and does not allow certification claims. It is intended for fisheries which do not meet the requirements of the MarinTrust standard, one of which being that the raw material used for production is approved against the MarinTrust Fishery Assessment.

The MarinTrust IP provides a process through which an improvement plan for the fishery can be developed and accepted. The production site may then apply to use this improvement raw material as part of the IP and must pass the MarinTrust site audit in order to gain acceptance onto the programme.

Once accepted onto the Improver Programme, the fishery the site is sourcing from has a structured improvement journey mapped out with agreed milestones and a timeframe that must be met to maintain IP recognition.

Coming up

In the forthcoming sections, our objective is to provide a thorough and impartial evaluation of the impact made through MarinTrust activities. The first few sections provide background on the hypothesis and objectives, methodology and information on the respondents that contributed to this evaluation. The findings and conclusion are presented from page 23 onwards, followed by recommendations by the author for future Impact Evaluations. In case any questions arise, stakeholders are encouraged to reach out to Natural Justice Consulting or MarinTrust using the contact information below.

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HYPOTHESIS AND OBJECTIVES

This Impact Evaluation aims to test the hypothesis:

“MarinTrust activities lead to improved or protected environmental parameters”.

MarinTrust activities in this context should be interpreted as including the MarinTrust Factory Standard and Improver Programme. More information about these programmes can be found in [“1. Introduction”](#).

Main objective of this Impact Evaluation is to contribute to the understanding of the cause-and-effect relationship between MarinTrust’s activities and the improved or protected environmental parameters. Additionally, it examines other factors driving improvements, such as stakeholder influence and market drivers, as well as an evaluation of the occurrence of **MarinTrust’s list of Unintended Effects**.

Evaluation worked on the objectives set by MarinTrust and outlined in their [Call for Proposals](#). **These objectives were the following:**

1. Identify if (and the extent to which) the MarinTrust Factory Standard is producing the desired positive intended environmental outcomes and impacts.
2. Identify to what extent is it possible to attribute observed effects to the activity or intervention of the standard system.
3. Identify what factors could have influenced the results (factors within the control of the standard system and other external factors).
4. Identify what unintended effects (positive or negative) have resulted from the activities or interventions assessed in a to c above (a list of potential unintended effects is currently included in the MarinTrust MEL system).

It should be noted that these objectives only mention the MarinTrust Factory Standard as this was the initial scope of the Evaluation. Thanks to the support of **ISEAL Innovation Fund Impulse Grant**, the scope was expanded to include the MarinTrust Improver Programme.



METHODOLOGY

This section outlines the methodology for this Impact Evaluation. In line with the ISEAL Impacts Code, it aims to provide an understanding for MarinTrust and other stakeholders to understand how conclusions were reached and to enable them to judge the quality of the underlying analysis. With this objective in mind, this methodology outlines which data was collected, through which collection methods and under which circumstances.[1]

Given the multitude of internal and external factors and variables, data analysis and particularly attribution, pose significant challenges. In this Impact Evaluation, various approaches to data collection and analysis were employed.

It is hoped that individually they are indicative and informative, and when taken in combination can lead to reasonable analysis and plausible conclusions.

[1] Clause 8.7 of the ISEAL Impacts Code (version 2.0, 2014)

ON THE NEXT PAGES

- Survey Groups
- Data Collection
- Data Analysis
- Limitations

Survey Groups

Evaluation encompasses three distinct survey groups: (MarinTrust) Certified Sites (1), (MarinTrust) Improver Programme Sites (2) and Non-Engaged Sites (3). The latter group refers to sites that currently do not engage with MarinTrust through the Factory Standard or the Improver Programme.

It is important to note that certain sites may hold dual roles, being both certified and participating in the Improver Programme. To ensure accuracy and avoid duplicative feedback, these sites have strategically been allocated to one survey group only to safeguard against double-counting of feedback, as overlap exists in questions across different survey groups.

Detailed information on the respondents among those survey groups is provided in ["4. Respondents"](#).

Data collection

To substantiate the hypothesis and fulfil the project objectives, the following data was collected:

- A. Quantitative data from surveys conducted among the three survey groups;
- B. Quantitative data on all MarinTrust Certified Sites and Improver Programme Sites;
- C. Qualitative data through interviews with a selected subset of survey participants in the three survey groups;
- D. Review of legal requirements pertaining to IUU-fishing, traceability of raw materials and emissions for (selected) respondents;
- E. Review of market demands for MarinTrust Certification and Improver Programme, i.e. sourcing by feed producers and pet food producers.

By combining quantitative and qualitative methodologies and analysing legal requirements and market dynamics, this methodology supports a holistic comprehension of the environmental impact of MarinTrust activities. The methodology is designed to establish correlations, causation, and any unintended effects.

The next pages outline the data collection for data A to E in detail. Data analysis will be discussed from [page 12](#) onwards.

A. Quantitative data through surveys

Quantitative data collection through surveys was conducted using an online platform, SurveyMonkey, where all site representatives in the three survey groups were invited to participate. Following an announcement by MarinTrust of the upcoming survey, with an option to opt-out of participation, site representatives received invitations via email. Following the initial introduction, MarinTrust was not involved in further correspondence, and interaction occurred solely between Natural Justice Consulting and the site representatives. Representatives were informed that responses were reviewed solely by Natural Justice Consulting and were not shared with MarinTrust or others outside of the organisation. Respondents in the survey will receive the summary report of the Impact Evaluation directly in their inbox.

Surveys were conducted between October and November 2023. Utilising SurveyMonkey allowed respondents to save their responses and return to complete the survey later. On average, participation in the survey took approximately 15 minutes. Surveys were offered in multiple languages, including English, Spanish, Vietnamese, Thai, and French, ensuring accessibility to a diverse range of participants. English served as the default language. For sites located in countries where one of the non-English languages was an official language, all communication was conducted in that language, including the initial invite to participate. This approach facilitated participation in an official language of their country for approximately 74% of all invited sites. Countries where participation in their native language could not be offered were Brazil, Denmark, Estonia, Finland, Iceland, Indonesia, Japan, Latvia, Norway and Poland.

B. Quantitative data on all MarinTrust Sites

Quantitative data was made available by MarinTrust on all sites engaged in MarinTrust activities (Certification & Improver Programme), including names and location, their initial year of obtaining certification or Improver Programme participation and their production volume. The purpose of utilizing this dataset is to facilitate an understanding of the extent to which respondents in the evaluation can be considered representative of all sites involved in MarinTrust activities. These findings can be found in "4. Respondents" of this report and it is hoped they contribute to an understanding of the credibility of this report.

C. Qualitative data through interviews

Qualitative data was collected through virtual interviews with a total of 7 respondents, comprising 5 individuals from the Certified Site Survey Group and 2 from the Improver Programme Survey Group. All respondents participating in the interview had already participated in the survey.

Interviews took place in December 2023 and January 2024, after all survey responses were received. Interviews were conducted via Teams and offered in English and Spanish. Interviews were not recorded; instead, the author drafted a summary of the responses. Interviews included 1 or 2 representatives and each interview session lasted between 30 to 60 minutes. The interview questions were open-ended and as neutral as possible, meaning respondents could expand on both positive and negative experiences and feedback. Respondents were instructed to expand on their responses as much as they considered relevant for the questions. While there was some overlap between the questions asked in different interviews, the list of questions was not identical each time, with some questions being added or removed based on the survey responses of the particular respondent.

D. Review of legal requirements

Legal assessment was carried out to examine the legal obligations pertaining to IUU-fishing, traceability of raw materials, and emissions. This legal review served to better understand the causal relationship between the improved or protected environmental parameters and MarinTrust activities. In other words, the impact made through MarinTrust activities depends partly on whether they provide a higher level of environmental protection compared to existing national or regional legislation. Capacity constraints meant not all 22 countries where sites participated could be included in the assessment and the review was therefore focused on countries with multiple respondents and where legal documentation were accessible to the author based on language and expertise. This resulted in the inclusion of half the countries (11), which meant that 68% of survey responses could be compared to legal requirements of the country of the respondents. Legal assessment was conducted between November 2023 and February 2024. Assessment was primarily conducted through desktop research, with some respondents consulted to verify the applicability of specific regulations to their sites. As the author has a legal education and experience in legal assessments, she was able to conduct the assessment herself. Additional details regarding the author's qualifications and the review methodology are provided in [Annex A](#).

E. Review of market

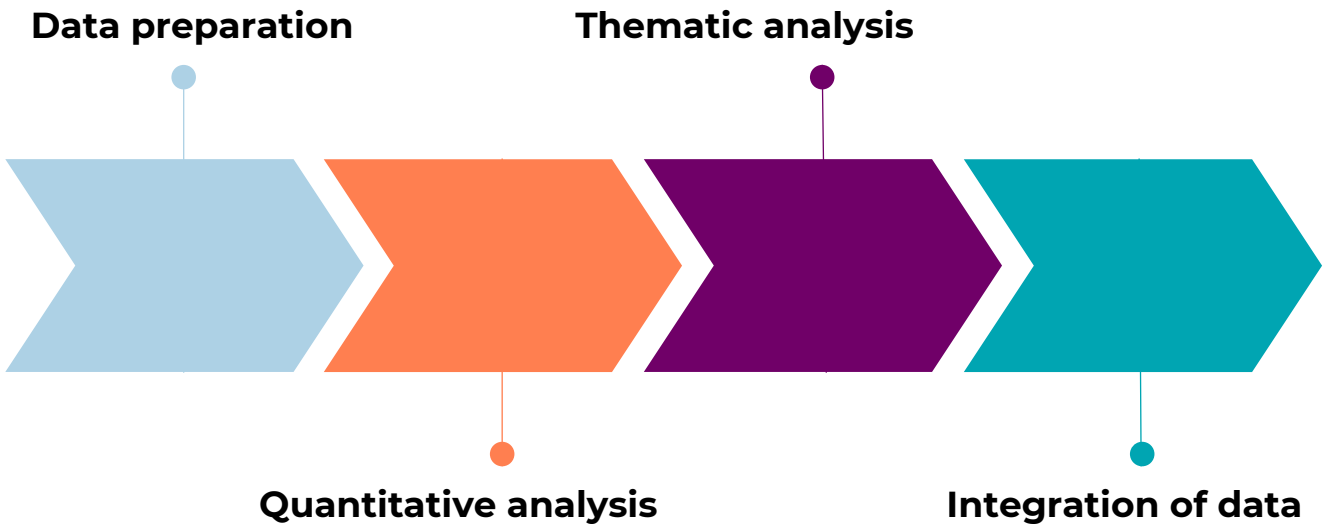
Review of market request for MarinTrust materials was conducted with a focus on direct customers of MarinTrust's Certified or Improver Programme sites. This review provided an understanding of the market influence on the ask for MarinTrust, in addition to the insights gained through the surveys and interviews.

Customers included aquaculture feed producers, pig and poultry feed producers, pet food producers, cosmetics producers, and supplement producers. To manage capacity constraints, two customer types were selected for an in-depth review, namely aquaculture feed producers and pet food producers. Despite pig and poultry feed producers being more frequently mentioned as customers by respondents, it was decided that including pet food producers and aquaculture feed producers would yield more comprehensive results. This decision was based on the desire to encompass both consumer-facing customers (pet food companies) and feed producers, which typically deal with influences through business-to-business (B2B) policies, thus hopefully providing a more holistic understanding of market asks.

Through a desktop review, up to 20 producers in each customer group were examined, representing a range of locations and company sizes but always including the top 10 producers by market value. The review assessed whether the sourcing policies of these companies relied on Voluntary Sustainability Standards (VSS) for marine ingredients and if so, if MarinTrust was among the VSS asked for by these producers.

Data Analysis

To translate the data described under “Data Collection” into meaningful findings, the following steps were completed:



1. Data preparation:

- (A) Survey responses were compiled into an excel, allowing for easy comparison and removal of respondents that did not provide sufficient feedback to be included. This left 47 respondents.
- (B) Data on all respondents was reviewed to include all information required to assess the ability of the respondents to represent the survey groups.
- (C) Interview responses summaries were compiled into a word document. Where responses to questions were insufficient to draft a coherent response, it was marked as “not responded to”. This occurred twice.
- (D) Legal review was scanned for any missing data, where it was marked “unknown”. This means it is assumed for the findings that there is no legal requirement in place.
- (E) Market demands review was scanned for any missing data, where it was marked “unknown” and therefore assumed there is no sourcing policy referencing VSS and/or MarinTrust.

Once all the documents holding the data were cleaned up and any non-responses were marked and missing information was clearly identified, all data was translated to English. In the case of interview responses or quotes in the survey comment boxes, the original language was kept alongside the English translation.

2. Quantitative analysis

Survey responses were the starting point of the analysis. Frequencies were calculated and translated into percentages. This included not only the self-evaluation of the sites on the impact of the MarinTrust activities, but also included the information on their sites that may influence their experiences. Most of the analysis was conducted manually. Calculations were supported by formulas in excel, but always recounted or recalculated manually.

For numerical data points means and medians were calculated. Outliers were selected and scrutinised during interviews (if applicable) or by comparing with the legal review. At times, averages were calculated with and without the outlier(s).

3. Thematic analysis

Building on the quantitative analysis, recurring themes and patterns were found and it was reviewed whether they could be supported by the qualitative data of the interviews and/or the legal review and market demands review. Selection of the recurring themes and patterns to include in the findings was guided by their relevance in addressing the Impact Evaluation's hypothesis. Additionally, consideration was given to whether the themes and patterns provided noteworthy or unexpected insights that could be valuable for MarinTrust and its stakeholders.

4. Integration of data

Writing of findings was commenced by putting the selected themes and patterns into writing. Having an initial outline of main findings meant the author was able to take another look at findings and see if additional layers could be added, for instance by understanding commonalities between respondents and that gave the same or similar responses. At this stage the findings were also provided to an independent consultant Mike Read (www.mikeread.org) for feedback before finalising the findings.

Limitations

Limitations to consider in the review of this Impact Evaluation are as follows:

- **Limited ability to analyse survey data on basis of commonalities:**

Total number of respondents include 47 site representatives. This relatively small sample size poses a challenge in discerning commonalities among factories and their potential influence on the findings, because there are many potential factors (country, size, company structure) influencing the 47 respondents.

- **Improver Programme Sites Sample Size:**

Only 8 respondents participated in the Improver Programme survey group. While this passes the threshold for including responses in findings, it is important to understand that this small sample size (representing 18% of all Improver Programme sites) may lead to findings easily skewed by outliers.

- **Non-Engaged Sites Sample Size:**

Efforts to include respondents from Non-Engaged Sites only resulted in 2 responses. Given this limited response rate, the insights gained through their responses are not statistically significant and should not be understood as representing the broader survey group of Non-Engaged Sites. Insights into this survey group will only be shared where they may offer valuable insights in combination with other findings.

- **Barriers to participation could not be adequately assessed:**

The fact that all respondents represent either a Certified Site or Improver Programme Site (see previous limitation), means there are no responses from those who have been unable to overcome barriers like costs or capacity.

Continuation of limitations on the next page

- **Sites offering both Certified and Improver Programme materials:**

Improver Programme materials are not the same as certified materials, but it is possible that a site offers both certified and Improver Programme materials. In order to offer Improver Programme materials, a site undergoes a Site Audit under the same criteria as applicable for obtaining MarinTrust certification. The difference is that, unlike certified materials, Improver Programme materials are not sourced from fisheries that are approved against the MarinTrust Fishery Assessment, but rather sourced from a fishery in an accepted Fishery Improvement Project (FIP). 37.5% of Improver Programme respondents already offered certified materials prior to starting participation in the Improver Programme. This likely skews their self-evaluation on improvements made for participation in the Improver Programme, as they already passed a Site Audit for certified materials. This was confirmed through comments and interviews with Improver Programme respondents.

- **Difference in starting year of Certification and Improver Programme:**

MarinTrust's Certification has been available since 2009 (then: IFFO RS), while the Improver Programme was introduced in 2015. This temporal difference complicates comparisons considering a significant amount of legislation relevant to the "Review of legal requirements" emerged between 2009 and 2015. The evolving legal landscape during this period may influence the pre-intervention baseline, at least between the Certified Sites that obtained their initial certification pre-2015 (36% of certified respondents) and the Improver Programme respondents.

- **Evolution of certification requirements:**

Certification standards evolve over time. Depending on the time of the initial certification, the pre-intervention baseline of Certified Sites may differ for the 46% that had their initial certification under version 1.0 of the Factory Standard and the remaining 54% that had their initial certification under version 2.0 of the Factory Standard.



RESPONDENTS

In this section we shed light on the respondents that have contributed to the findings in this Impact Evaluation, particularly to provide more background and better understand to what extent findings should be seen as representative. We aimed to engage:

- (1) Certified Sites;
- (2) Improver Programme Sites; and,
- (3) Non-engaged Sites, which are not involved with either the MarinTrust Certification or the Improver Programme.

Throughout this evaluation, each Site has been designated into a distinct group, asking them to respond to the survey and interview questions on that behalf. This allowed for better tailoring of the questions to capture the relevant experiences and feedback based on their engagement with MarinTrust.

ON THE NEXT PAGES

- Survey Group 1
Certified Sites
- Survey Group 2
Improver Programme Sites
- Survey Group 3
Non-Engaged Sites

Survey Group 1: Certified Sites

Certified Sites represent the largest group of respondents, with 39 individuals engaged on behalf of their site.

A. Competence of respondents

Respondents were generally experienced at their site, with only 3% having limited experience (0-1 years) and 18% having 1-4 years of experience. This leaves a large majority of 79% with more than 5 years of experience. Looking at their position within the site, about 90% of those experienced respondents hold a management position, most frequently Plant Manager, Quality (Assurance) Manager or Director. Furthermore, we found that 87% of all respondents and 97% of experienced respondents have actively participated in the process of obtaining MarinTrust certification, underscoring a high level of involvement and commitment within the participants. A smaller portion, 13%, indicated they were not directly engaged in the certification process, with 5% attributing this to not being part of the factory workforce during the certification period. Finally, 92% participated in an official language of the country where their factory is located.

Considering the abovementioned data points on a respondent level, it can be deduced that 85% of the certified site respondents were experienced managers, involved with obtaining the initial MarinTrust certification of their site, that responded in an official language of their country. It can therefore be expected that they are sufficiently competent and experienced to participate on behalf of their site, as well as sufficiently understood the questions to respond to them.

B. Background on sites

Participating factories in the Impact Evaluation have a median founding year of 1995. A significant majority of 89% of certified sites have been operational for more than a decade.

In terms of size categories, as defined by MarinTrust^[1], 7 participating factories can be defined as small, 21 as medium and 11 as large. Comparing the site sizes to the full survey group, it can be concluded that all site sizes are represented by multiple respondents. Due to an overrepresentation of medium sites, there is an underrepresentation of small sizes in particular.

[1] Small factories are defined as producing 0 – 9,999 Metric Tonnes (MT) of product annually, Medium factories are defined as producing 9,999-29,999MT annually and large as producing more than 30,000MT annually.

A closer examination of **employment** reveals that small factories, on average, employ 56 individuals, ranging from 6 – 120 employees. Medium-sized factories have an average of 83 employees, with a range of 12 to 180 people. Large factories exhibit greater diversity, with an average of 794 employees, ranging from 44 to 3500 people. It is noteworthy that one large factory has an outlier of 3500 employees; excluding this outlier, the average for large factories is 523 employees. This variance suggests there may be difference in organisational structures or participants' interpretation of "full-time employees".

In terms of **direct customers** of the certified sites, most common customers are aquaculture feed producers (92%), followed by pig and poultry feed producers (72%). About half (51%) of respondents have pet food producers as customers. Minority of respondents have supplement producers (26%) and cosmetic producers (8%) as customers.

54%

Responding Certified Sites are of medium size

89%

Responding Certified Sites existed for 10+ years

92%

Responding Certified Sites have aquaculture feed producers as customers

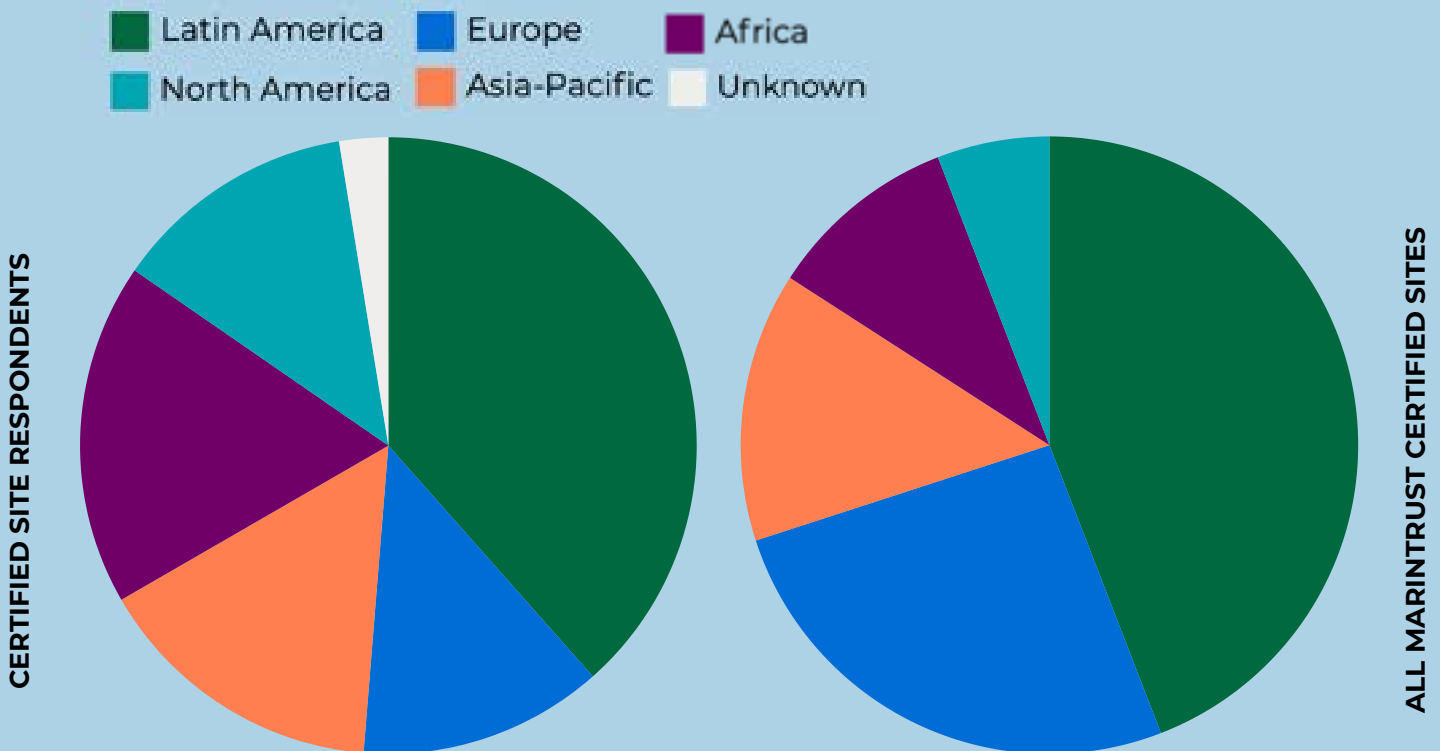
51%

Responding Certified Sites have pet food producers as customers

C. Geographical representation

Protecting the anonymity of respondents and more broadly those involved in MarinTrust activities, data on specific numbers or percentages will be provided on a regional-level rather than a country-level. Visualising the geographical distribution of respondents, the chart below offers an overview of the percentages of representation by each area. Sites in Central & South America represent the largest group of respondents, making up 39% of total respondents, and European sites represent the smallest group of respondents, making up for 8% of the total.

Efforts were made to ensure that the respondents were able to represent the full survey group. Comparing the respondents (*left chart*) with all Certified Sites (*right chart*), it can be concluded that comparing the two groups shows that geographical representation percentages generally deviate from the composition of the Sites. Most notable underrepresentation to be aware of is on behalf of European Sites. On the other hand, it should be known that North American and African Sites are overrepresented.



D. Improver Programme participation

28% of Certified Site respondents also participate in the Improver Programme. Compared to the 17% average of all Certified Sites also participating in the Improver Programme, this is not representative. Relevant in this context is to note that 21% of respondents indicated they are unsure if they participate, and 51% indicated they do not participate. These responses have been verified against the quantitative data on all Sites and are confirmed to be correct.

Survey Group 2: Improver Programme Sites

In our second group, a total of 8 participants took part in the survey, with one respondent providing incomplete responses, resulting in a sample size of seven for certain questions.

A. Competence of respondents

The group of respondents exhibits a diverse range of experience, with almost half of representatives working for more than 10 years at their factories and the other half working there less than 4 years. As with the Certified Factories group, most respondents (87.5%) maintain a management position within their Site. 62.5% of respondents were personally involved with initiating Improver Programme participation, which includes all the respondents that were very experienced at their site (10+ years). 75% respondents were able to participate in an official language of the country where their factory is located.

Considering the abovementioned data points on a respondent level, it can be deduced that 50% of the certified site respondents were experienced managers, involved with initiating the Improver Programme participation for their site. 75% of them responded in an official language of their country, meaning 37.5% of all respondents were considered competent and responding in an official language. Generally this means that the competence of the Improver Programme respondents should be assumed to a lesser extent than among the Certified Sites, where a high level of competence and comprehension could be assumed for 85% of respondents.

B. Background on sites

Regarding the size of the companies, 2 respondents (25%) represented a small site, 3 a medium site (37.5%) and an equal amount of large site. Average employee total was 102 individuals.

A large majority of respondents (87.50%) identified aquaculture feed producers as their primary customers, and 50% reporting having both pig and poultry feed producers and pet food producers. None of the respondents indicated supplements or cosmetics producers as their customers. Insights gathered during interviews revealed that some participants regularly sell materials to traders, where the exact end-use of the Improver Programme materials remains unknown.

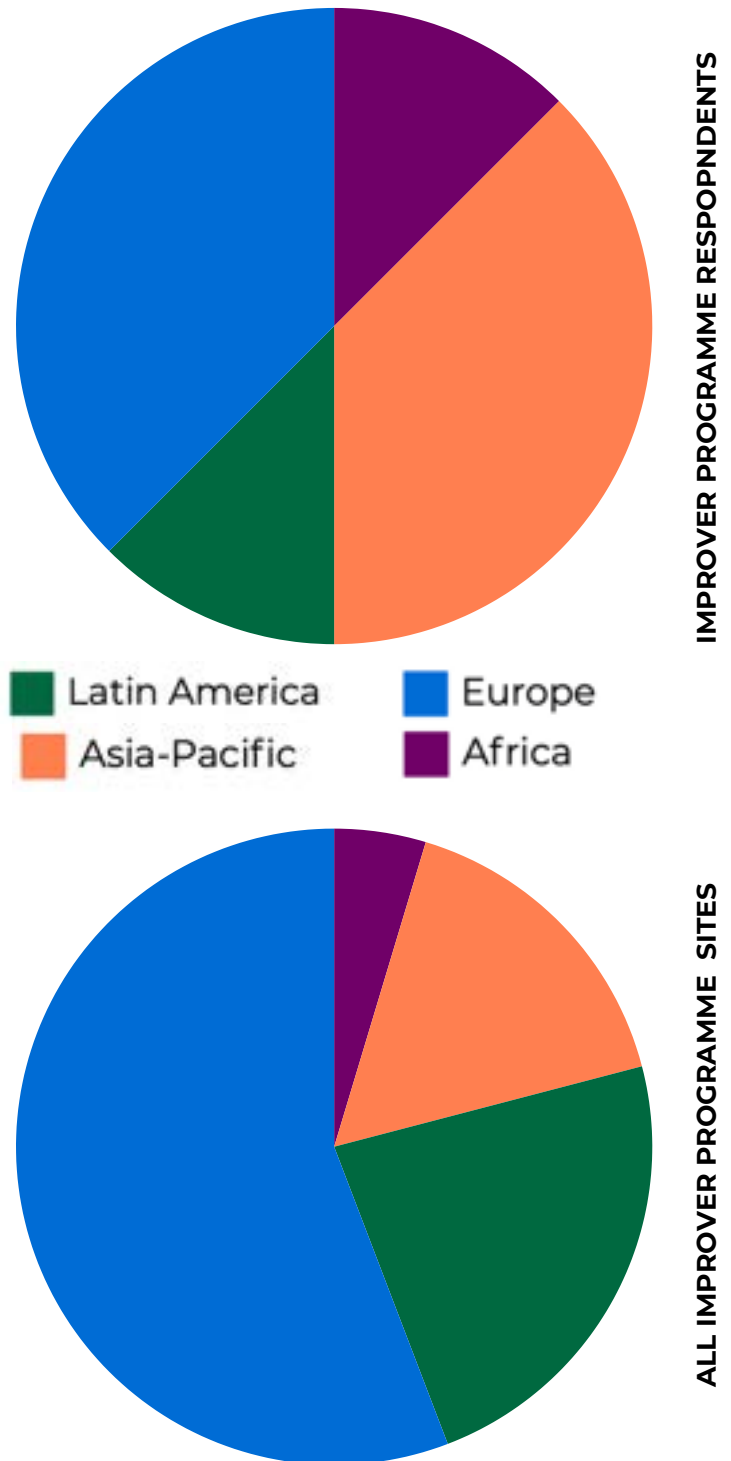
Comparing site sizes to the overall survey group reveals that all site sizes are represented by multiple respondents. Small sites constitute nearly half (49%) of all sites in the Improver Programme, whereas large sites are disproportionately low, comprising only 19% of the total surveyed. This may result in challenges by smaller sites not being highlighted in a representative manner.

C. Geographical representation

Protecting the anonymity of respondents and more broadly those involved in MarinTrust activities, data on specific numbers or percentages will be provided on a regional-level rather than a country-level. Respondents represented factories located in Europe (3), Asia-Pacific (3), Central & Latin America (1), and Africa (1). It should be noted in this context that Improver Programme participation is not as widely available as Certification and that less countries are represented among the Improver Programme Sites. Countries currently represented are: Denmark, Ecuador, Iceland, India, Ireland, Mauritania, Norway, Thailand, United Kingdom and Vietnam.

To assess the ability of the respondents to represent “Improver Programme Sites” we compare their geographical distribution with the percentages of all Improver Programme Sites. As the number of Improver Programme factories is significantly smaller than those with MarinTrust Certification, comprising 43 factories and 170 factories respectively, a smaller number of participants was expected. Diving into the respondents, we can find the following.

Comparing the respondents (*top chart*) with all Improver Programme Sites (*bottom chart*), it can be concluded that comparing the two groups shows that geographical representation percentages generally deviate from the composition of the Sites. Something that supports the respondents’ ability to represent Improver Programme Sites is the fact that, despite the small sample size, all relevant areas are represented. Most notably, Asia-Pacific is strongly overrepresented.



Survey Group 3: Non-Engaged Sites

While assembling the data for the Impact Evaluation, engaging Non-Engaged Sites posed a challenge within the given timeframe. As there is no or limited direct contact between MarinTrust or Natural Justice Consulting and the group of Non-Engaged Sites, there is a smaller group of sites of which contact information was available.

A total of 5 sites provided permission to be contacted for the survey and 2 sites completed their responses. While these responses offer valuable insights, only a limited set of high-level findings will be presented under “[5. Findings](#)”, as the participation of Non-Engaged Sites did not produce representative results. See “Limitations” under Chapter 3 for more information.

The Non-Engaged Sites that responded represent sites that were never MarinTrust Certified and/or a participant in the Improver Programme. Their sites are located in North America and Asia-Pacific.

Before you dive in

The next section will outline the findings of this Impact Evaluation. It is strongly recommended to consider the limitations to the data analysis ([see page 14 under Methodology](#)) and this Respondents section when taking note of the findings.



FINDINGS

The findings section unveils an exploration of sites' experiences, motivations, drivers and barriers in the context of MarinTrust Certification and Improver Programme.

During the survey and interviews respondents were asked to reflect on improvements made during their initial audit. The emphasis is on the first successful audit, rather than subsequent audits, thus informing pre-intervention baseline measure equal for all participating factories regardless of the year of their initial certification.

This section aims to uncover specific details about the positive and negative environmental changes brought about by the Certification or Improver Programme participation and its implications for environmental sustainability.

ON THE NEXT PAGES

- Findings on Environmental Parameters (including unintended effects)
- Findings on motivations and drivers
- Findings on barriers

Findings on Environmental Parameters

Summary of findings:

- Majority (80%) of Certified Sites and of (71%) Improver Programme respondents (strongly) agreed with statement that their site improved on responsible sourcing, traceability, responsible manufacturing and procedures to become certified or an Improver Programme participant.
- Responsible sourcing of fishery materials and traceability are areas where most Certified Site respondents (strongly) agreed improvements were made (81-94% of Certified Sites and 71% of Improver Programme site respondents).
- Minimising negative impact of fishery on species' habitat and on ETP-species are areas where least impact was made through MarinTrust activities, with approximately 67% indicating improvements were made to a (very) large extent.
- North American and African respondents report highest means on improvements made, European respondents report lowest means on improvements made.
- Half of tested MarinTrust Unintended Effects occurred more often than not.

In order to assess the impacts made through the Certification and Improver Programme, sites' improvements will be based on the self-evaluation through the survey and interviews as well as the difference between applicable legal requirements and MarinTrust Standard criteria.

Respondents were tasked with identifying improvements in environmental parameters to achieve their initial MarinTrust Certification and to specify areas of change.

Based on the scope of this Evaluation, the following areas were included:

- Responsible sourcing of marine ingredients (Sections 1, 4 of Standard)
- Traceability of marine ingredients to fishery (Section 2 of Standard)
- Responsible Manufacturing Practices, excluding food safety requirements (Section 3 of Standard)
- Formalised procedures for sourcing fishery materials (Section 1 of Standard)
- Formalised procedures for compliance with national legislation on emissions (Section 6 of Standard).

Feedback from Certified Sites largely indicated positive outcomes, with at least 80% of respondents either agreeing or strongly agreeing their factory demonstrated improvements in each of the identified areas. Among Improver Programme Sites 71% of respondents agreed improvements were made. The main areas of improvement were the responsible sourcing and traceability of marine ingredients, with a large majority of 94% of Certified Sites and 71% of Improver Programme Sites expressing agreement or strong agreement that strides were made due to MarinTrust activities (i.e. obtaining certification of becoming a participant).

It should be noted that for Certified Sites responsible sourcing and traceability stood out above the others, whereas among Improver Programme Sites the same number of respondents indicated strong agreement for these areas as for Responsible Manufacturing Practices and Formalised Procedures. Improver Programme sites that indicated they did not agree improvements were made, had already obtained certification prior to becoming a participant, i.e. they had already completed a Site Audit for their certified materials where most of the areas tested here were already demonstrated to be complied with. Validation for the notion of improvement was confirmed in interviews, where also those critical to some elements of MarinTrust's activities indicated that becoming certified supported in reinforcing their environmental parameters. Notably among 47 participants for this Evaluation only one was identified where the MarinTrust Certification was reported to not have had any positive impact on environmental parameters.

“[Becoming MarinTrust-certified] allowed us to train our collaborators and crew to put elements of responsibility into practice”

Taking a deeper dive into the improvements made in the context of responsible sourcing and traceability of marine ingredients, respondents identify traceability (Section 2 of the MarinTrust Standard) as one of two areas where most improvement has been observed. Specifically, the establishment of a system to track the origin of materials, along with having a documented record for each landing of whole fish, is highlighted.[1] In addition to traceability, several elements of responsible sourcing were identified as areas where improvements were made to a large extent. Certified Sites and Improver Programme Sites on average responded that improvements were made to a large extent to ensure that fishery materials only include species that are not overfished.

Further, respondents found an improvement was made to have details on the vessel that caught the fishery materials[2], where a slightly higher average (“improvements made to a very large extent”) were observed among Improver Programme Sites. The least frequently recognised impact following MarinTrust activities was in the field of minimising negative impact of fishery on species’ habitat [3] (Certified Sites) and on ETP-species [4] (Improver Programme Sites). Approximately one third of respondents expressed that obtaining MarinTrust certification either did not establish improvements or did so only to a limited extent in this context.

[1] As defined in criteria 1.4.1, 1.4.2, 2.1.1 of MarinTrust Factory Standard (version 2.0)

[2] As required in criterion 1.4.3 of the MarinTrust Factory Standard (version 2.0)

[3] As required in criterion 1.3.3.2 of the MarinTrust Factory Standard (version 2.0)

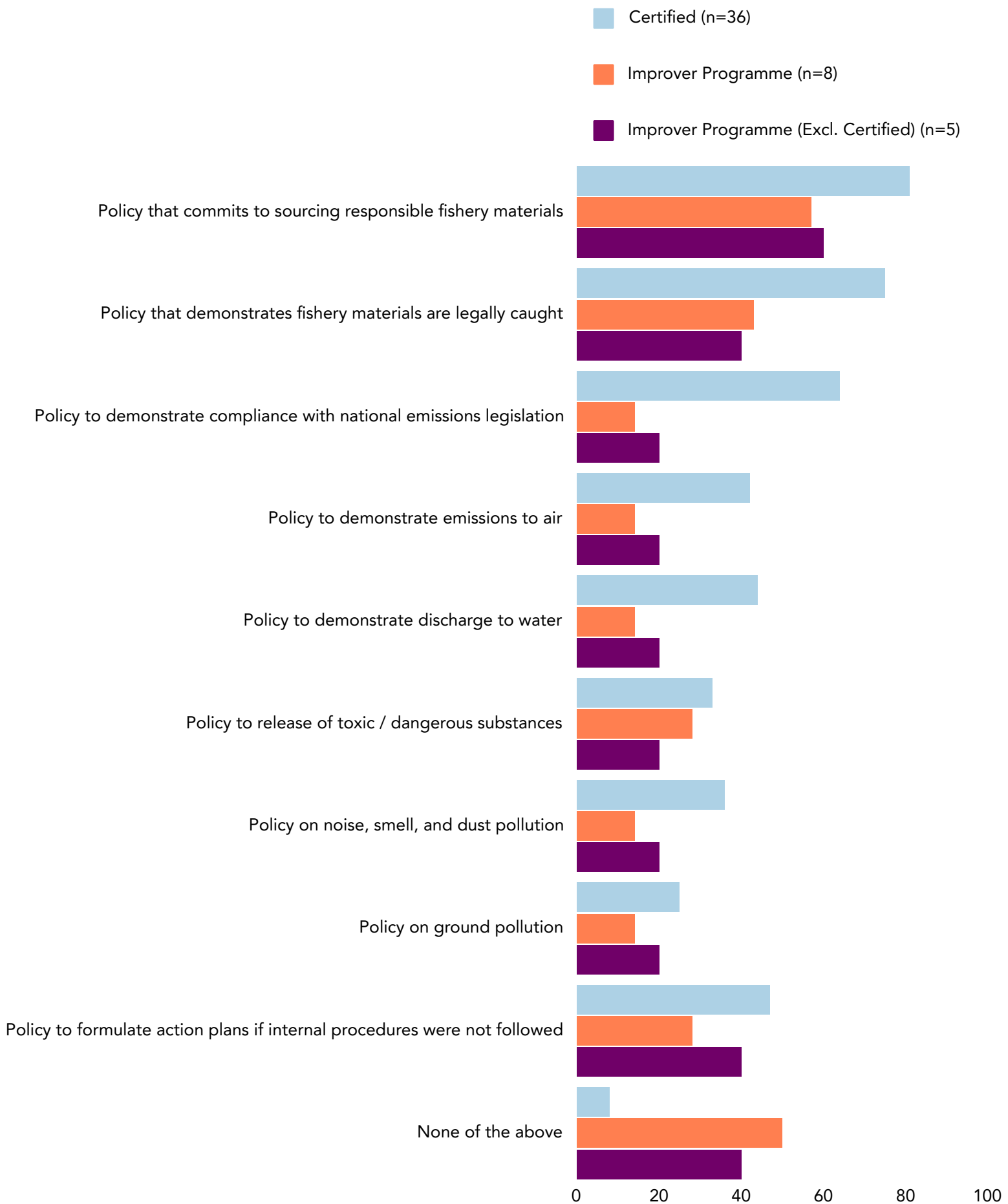
[4] As required in criterion 1.3.3.1 of the MarinTrust Factory Standard (version 2.0)

Upon scrutinising the responses, it was observed that in the majority of cases, the same factories conveyed that acquiring certification had either resulted in no improvements or only to a limited extent across all aspects related to responsible sourcing or the traceability of fishery materials. This pattern persisted for 5 out of 34 Certified Sites who initially expressed agreement or strong agreement regarding improvements made in this context. Consequently, the actual percentage of Certified Sites deeming substantial improvements were made in the context of responsible sourcing or traceability of fishery materials may fall within the range of 81% and 94%. No such observation was made within the Improver Programme Sites group and the 71% of respondents that indicate substantial improvements were made appear to confirm this in follow up questions.

Final findings related to responsible sourcing include the **establishment of procedures outlined in the MarinTrust Standard**. The chart on the next page shows the percentages of respondent confirming that these procedures or policies were added to meet the requirements of the MarinTrust certification and Improver Programme participation.

It was found that the percentages of Improver Programme Sites reporting policies or procedures were added is always lower than among Certified Sites. As this may be attributed to the fact that 37.5% of respondents already offered certified materials prior to participating in the Improver Programme, a third group is included in the chart, namely Improver Programme Sites that do not offer certified materials and therefore underwent the Site Audit for the first time to offer Improver Programme materials.

IMPACT EVALUATION MARINTRUST



Reviewing the reported improvements again, but changing from a thematical focus to a **geographical focus**, we can see differences in scoring between the different continents. North American and African sites report the highest number of improvements made to become MarinTrust-certified or an Improver Programme participant, reporting on average that improvements made for criteria related to responsible sourcing and traceability of raw materials meant that the site has improved to “a very large extent”. Furthermore, a mean of 7.12 out of the required 9 formal policies & procedures were added due to MarinTrust activities.

In comparison, Europe, reported fewest changes made to obtain MarinTrust certification or become an Improver Programme participant, the average response was that improvements were made “to a large extent” and that 4.67 formal policies and procedures were added.. It can therefore be deducted that sites consider that becoming MarinTrust activities has brought about improvements in the context of responsible sourcing and traceability to a large extent in all areas, but that sites in North America and Africa consider these changes to be even more significant than in other areas.



Finally, reported improvements were **compared to legal requirements** on eradicating IUU-fishery materials, emissions, waste and discharge to water. Generally, it can be found that many countries and/or regions have taken some measures in the context of emissions and waste mitigation, ranging from stringent limits to initiatives to incentivise more responsible practices through cap-and-trade or tax emission schemes. Participants from certain countries consistently expressed that several MarinTrust criteria were already adhered to, as they align with national legislation. Therefore, obtaining certification was not considered as resulting in improvements of their environmental parameters. Respondents from South Africa, Ecuador and Panama highlighted this more than others. Following examination of national requirements for these three countries, it could not be confirmed with certainty that reliance on national laws provided the same level of environmental protection as through the MarinTrust Certification, at least not as it pertains to all areas where the MarinTrust Standard requires policies: emissions, toxic/dangerous substance release, noise, smell and dust pollution, ground pollution and formulating action plans to address if international procedures were not followed. Besides significant legislative efforts by the EU, US and some RFMOs [1], legal requirements for traceability and avoiding IUU-fishery materials with proven effectiveness seem to depend primarily on private initiatives. This seems to confirm the findings that traceability and IUU-fishery materials are areas MarinTrust Certification made most contributions to improved or protected environmental parameters.

[1] Based on independent legal research by author and article by Xuechan Ma, 'An economic and legal analysis of trade measures against illegal, unreported and unregulated fishing' (2020) Marine Policy 117.

Contributions to eradicating IUU-fishing materials in marine ingredients

This section made clear how improvements were made in the context of responsible sourcing. Most noteworthy observations did not explicitly address the impact on eradicating illegally, unreported and unregulated (IUU) fishing materials. Given that this is one of the core goals of the MarinTrust Standard (see MarinTrust website), some key findings related to IUU-fishery materials should be highlighted. According to 75% of respondents, a procedure to demonstrate the legal catch of fishery materials, was added to obtain MarinTrust Certification or become an Improver Programme participant. It can cautiously be inferred that only 1 in 4 factories had an IUU-policy in place prior to becoming MarinTrust-certified. Similarly, 72% of respondents indicated that obtaining MarinTrust Certification impacted their ability to demonstrate that their sourced fishery materials are legally caught. This finding suggests that, following traceability, the eradication of IUU-fishing materials is an area where respondents believe becoming MarinTrust-certified has made contributions.

Unintended Effects of MarinTrust Certification

This section only includes findings on the Certified Sites as the list of Unintended Effects relates to effects following MarinTrust Certification.

MarinTrust maintains a list of Unintended Effects as part of their Monitoring, Evaluation and Learning system (MEL). The Unintended Effects included reference to outcomes or impacts not directly defined within MarinTrust’s Theory of Change and can be negative, positive or neutral in nature. The effects are not part of the ‘intended path’ that MarinTrust wishes to take to achieve the desired impacts. MarinTrust’s identified Unintended Effects relating to environmental parameters were included in the self-assessment of this Impact Evaluation, asking respondents whether the Unintended Effect had occurred and testing outliers on their correct understanding of the Unintended Effect. Any Unintended Effect with a purple line beyond the white 50% mark occurs regularly. Results of the self-assessment were as follows:



The Unintended Effects that occur regularly include:

- Site has more sense of stewardship and pride (true for 89% of respondents)
- Site receives a higher price for its marine ingredients (true for 57% of respondents)
- Site has attracted more potential investment (true for 54% of respondents)

We should be aware that these unintended effects were only verified as part of the self-assessments through surveys and interviews, no evidence was provided to substantiate the (non-)occurrence of the unintended effect. There is one unintended effect in particular that was reported to occur in more than 50% of cases that warrants critical evaluation, namely the effect relating to attracting more potential investment. Interviews made clear that this effect was often misinterpreted to mean it attracted more customers and with that potentially more revenue, rather than actual investment.

Several Unintended Effects **do not** appear to occur regularly, specifically:

- Site lost access to markets and/or customers (true for 3% of respondents)
- Site has less room to innovate (true for 6% of respondents)
- Site uses less energy and/or water (true for 40% of respondents)
- Site's costs increased (true for 43% of respondents)

MarinTrust is recommended to evaluate the inclusion of these Unintended Effects to keep the list as reflective of reality as possible. One effect directly related to environmental parameters, namely less usage of energy and/or water. This effect was considered true by 40% of respondents. This unintended effect is therefore less impactful in the context of MarinTrust's contributions to improved or protected parameters, but it is still existent. This was the only unintended effect that related directly to environmental parameters.

Findings on Motivations and Drivers

Summary of findings:

- Respondents report that 71% of customers (by volume) ask for MarinTrust-certified materials, and 47% for Improver Programme materials.
- Main influencer on decision to engaged with MarinTrust activities (certification and Improver Programme) are customers, followed by shareholders (if applicable) and direct competitors. Lowest influence was attributed to government and local community.
- Measuring the influence of stakeholders beyond customers, underscored the variance in influence of stakeholders in different regions, particularly relating to NGOs and workers.
- Main customers are aquaculture feed producers, pig and poultry feed producers and pet food producers. Among the reviewed customers, almost half explicitly asks for MarinTrust materials (primarily certified), for the other half it is largely unclear what they ask for in sourcing materials.
- Several motivations were tested among respondents, ranging from customer acquisition to less commercial motivations such as stewardship for responsible marine ingredients.

Similar to the approach in the previous section for assessing changes toward improvements or protected parameters, a mix of self-assessment and verifiable primary data will be employed. For the review of motivations and drivers, influences through customer asks, (others stakeholders and internal factory motivations).

Stakeholder influence

Survey respondents provided insight in the amount of customers (in volume) asking for MarinTrust-certified and Improver Programme materials. While all respondents were asked to provide an indication, it was decided only responses by Sites that have firsthand experience offering the material would be included, as almost all outliers were reported by those lacking firsthand experience. Their inability to report a representative percentage was further confirmed through their comments and/interview responses. For certified materials, this revealed a range from 25% to 100%, with on average 71% of customers (by volume) asking for MarinTrust materials. In contrast, for the MarinTrust Improver Programme materials, the range included 0% to 100% with an average of 47% of customers (by volume) asking for Improver Programme materials.

Beyond the demand of their customers, a broader context of influences was understood by asking respondents to express the degree of influence, ranging from no influence to a very large influence. Stakeholders that were included were **government, customers, suppliers, NGOs, local community, direct competitors, workers, and shareholders** (if applicable). Main influence on the decision to become MarinTrust-certified were customers, followed by shareholders as the second main influence and direct competition as the third main influence. Notably, the lowest influence was attributed to the government, with 57% of respondents indicating there was no influence and 20% only attributing some influence to the government.

The largest diversity in responses was observed for the influence by NGOs and workers. In the case of NGOs, the most substantial influence was reported in Panama, where it was rated as a very large influence, followed by Ecuador and Morocco, with an average rating of a large influence. Conversely, respondents from Peru, Norway and Thailand indicated there was no influence from NGOs. Finally, it is interesting to note that workers were noted to have a large to very large influence by Mexican respondents, and a large influence according to respondents from Panama, Vietnam and Ecuador. Influence by workers seems significantly higher in those countries, as generally workers were seen to have little influence, or even no influence according to respondents from Thailand and Norway. Measuring the influence of stakeholders beyond customers underscored the variance in impact of stakeholders in different regions

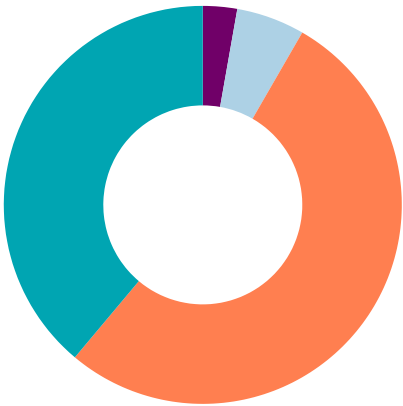
Influence by stakeholders on decision to become MarinTrust Certified is outlined in detail with the graphs on the next page.

Influence on the decision to become a **MarinTrust Improver Programme participant** shows a similar picture, with customers and direct competitors as the main influencing stakeholders. Main differences can be found in the fact that less sites have shareholders, and that local community was never reported as a stakeholder with any influence on the decision to become a participant. Finally, the influence by workers is notably lower, which may be attributed to the fact that the countries reporting that workers had a large influence are not represented in the Improver Programme Sites.

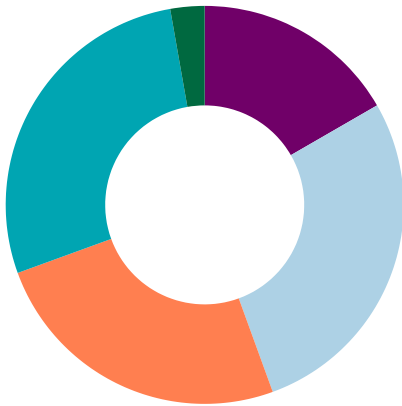
Stakeholder influence on decision to become MarinTrust Certified (n=36)



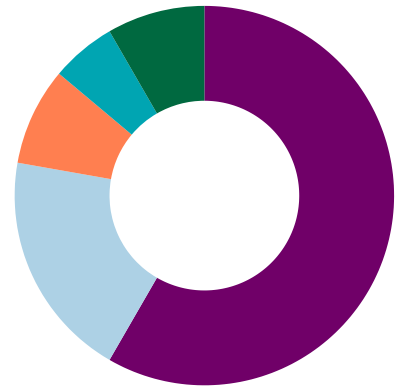
CUSTOMERS



DIRECT COMPETITORS



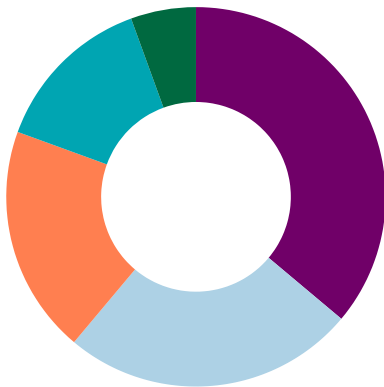
GOVERNMENT



LOCAL COMMUNITY



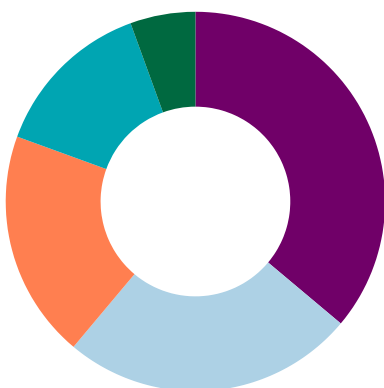
NGOs



SHAREHOLDERS



SUPPLIERS



WORKERS



Market drivers through aquaculture feed producers and petfood producers

In conducting market research on aquaculture feed producers, the sample included 18 producers, encompassing both the top 5 largest players and medium producers in the industry. Notably, 7 out of the 18 companies explicitly incorporate MarinTrust Certification into their sourcing policies, highlighting an alignment with sustainability practices. Although determining the market share of feed producers accepting MarinTrust certification proved challenging, our estimations suggest that the 7 accepting companies collectively represent between 46% and 60% of the market. Additionally, it's noteworthy that two major companies go beyond the certification and also reference the MarinTrust Improver Programme, showcasing an evolving commitment to continuous improvement and sustainability within the aquaculture feed sector.

Exploring the pet food industry, slightly less (successful) engagement was observed. A sample of 20 petfood producers were reviewed, including the top 10 global pet food producers by volume. Our investigation spanned companies headquartered in the United States, Canada, Switzerland, Spain, Netherlands, Germany, Belgium, and China. Among this cohort, 4 companies demonstrated a clear preference for sourcing MarinTrust certified materials, while a slightly larger group (6) leaned towards Voluntary Sustainability Standards (VSS)[1], but did not explicitly mention MarinTrust Certification. Notably, those endorsing MarinTrust materials collectively command a substantial 48% market share in the global pet food sector. Meanwhile, the broader VSS supporters hold a 50% market share. This discovery highlights the small difference between favouring certified ingredients under VSS in general and specifically opting for MarinTrust.

For more information on the market review, see "[3. Methodology](#)".

[1] Voluntary Sustainability Standards are private programs to verify a product meets specific environmental, social or economic sustainability metrics. For more information, see the UNCTAD website: <https://unctad.org/topic/trade-analysis/voluntary-sustainability-standards>

Motivations to become MarinTrust-Certified

In further exploring motivations of respondents, they were asked to respond to a number of statements to assess validity for their Site. Interestingly, all respondents unanimously expressed the believe that being MarinTrust-certified will help them acquire and retain customers. Furthermore, a large majority also believes that being MarinTrust-certified gives their company a competitive advantage over direct competition. However, motivation extends beyond customer relations and direct competition, as a very large majority of participants find that being MarinTrust-certified is the right thing to do (97%) and a large majority of this group confirm they would retain MarinTrust Certification even if no customer asks for it (80%). Upon closer examination of respondents with seemingly lower motivation for the certification, it was revealed that they still acknowledged substantial improvements in environmental parameters through obtaining MarinTrust Certification. One respondent expressed a lack of perceived benefit in being MarinTrust-certified and indicated no intention to retain the certification.

“MarinTrust Certification has become a requirement to enhance the value of our materials and be able to attract more demanding clients.”

Improver Programme Sites that are currently not certified were also asked about their motivations to become MarinTrust-certified in the future. All respondents (excluding those that already offer certified materials) indicated that their goal is to become MarinTrust-certified and none of the respondents indicated that becoming certified lacked perceived benefits. About 40% of respondents indicated that participation in the Improver Programme lowers the pressure to become certified. It could not be understood whether these respondents are aware that participation in the Improver Programme is timebound and does not provide a permanent alternative to MarinTrust Certification.

While the participation among Non-Engaged Sites was insufficient to draw general conclusions, in this context it may still be mentioned that the 2 respondents among this survey group also indicated they perceive benefit in obtaining MarinTrust Certification and that they expect it would help them attract and retain customers. This makes the total number of respondents that confirm these responses 7 Sites, namely 5 in the Improver Programme and 2 Non-Engaged Survey Group.

Motivations to participate in MarinTrust Improver Programme

All respondents were surveyed regarding their motivation to (not) participate in the Improver Programme. Respondents were able to select multiple motivations. The predominant motivation cited for participation or non-participation was the availability of responsible raw materials approved by MarinTrust, i.e. this is the most common reason to join as well as not join. Additionally, a belief in the goals of the improver programme was selected as frequently by participants as the availability of raw materials, indicating an intrinsic commitment to responsible sourcing.

A complete summary of the respondents motivation can be found on the next page.

“[We] have a very good traceability of all fish raw materials being purchased to all our factories [...]. We however find the MarinTrust Improver Programme to be important to get the fisheries [approved] and help improving the sustainability of the fisheries.”

Are you a participant in the Improver Programme?



**“I don't know”
8 out of 47 respondents**



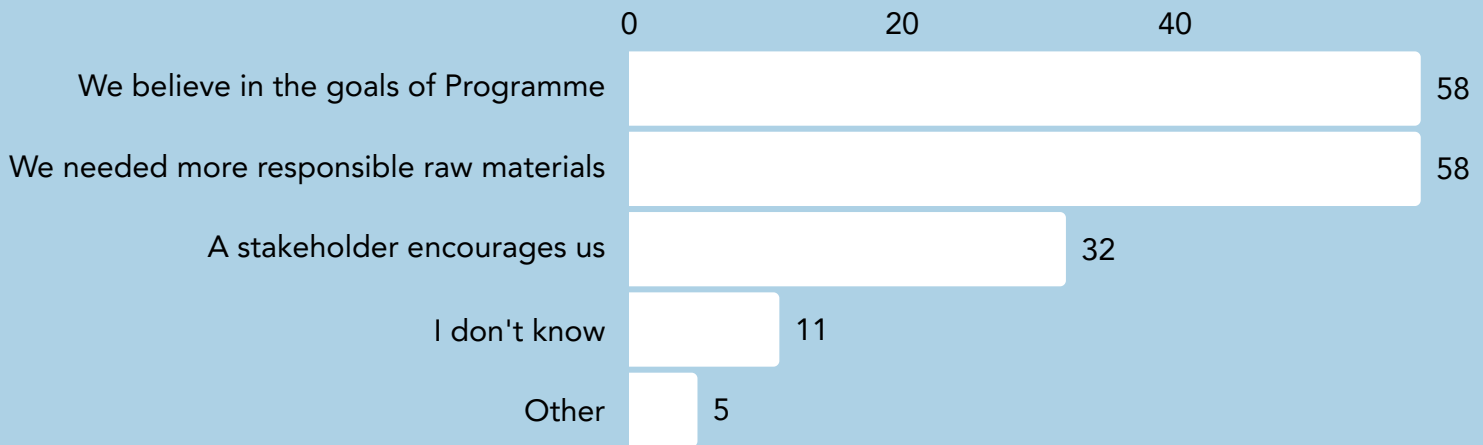
**“Yes”
19 out of 47 respondents**



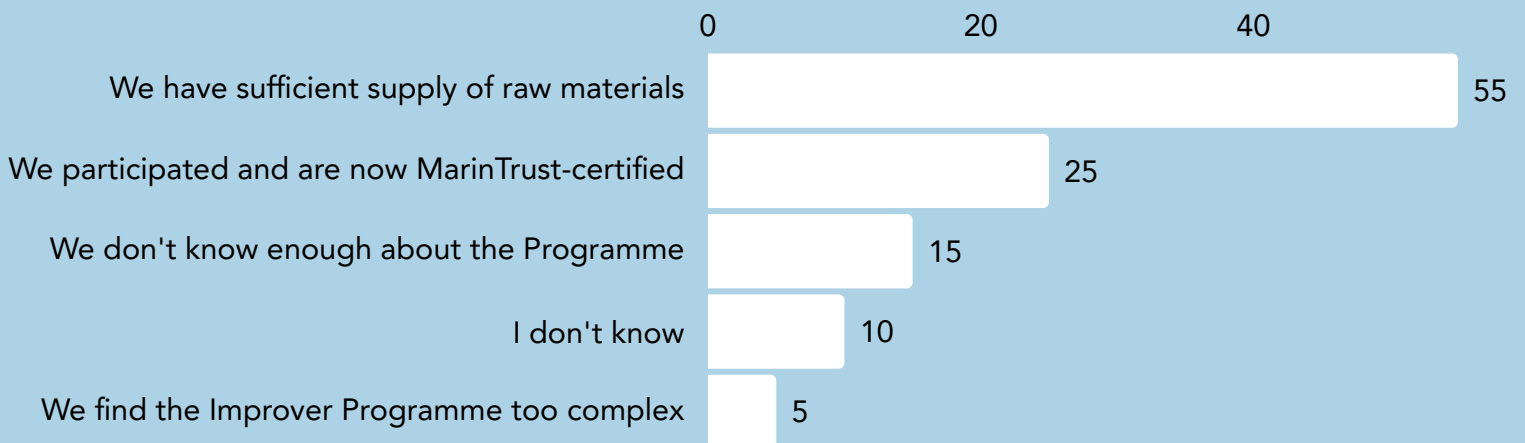
**“No”
20 out of 47 respondents**



Why do you participate in the Improver Programme? (n=19)



Why do you not participate in the Improver Programme? (n = 20)



Eight representatives, constituting about 17% of all respondents, indicated they don't know whether their sites participates in the Improver Programme. Among these, one respondent was relatively new to the site, but the remaining 87.5% may be reasonably assumed to know if their site participates in the MarinTrust Improver Programme. Additionally, 15% of non-participants indicated they don't know enough about the Programme and 25% indicated they participated in the past and are now certified while in reality, this only applied to 10% of the respondents. This suggests a potential misunderstanding surrounding the Improver Programme. This was further suggested by different comments and interview responses that revealed misconceptions about the Programme. It should be noted in this context that the majority of the respondents that revealed this misconception in their responses were located in countries where no Improver Programme sites are located.

Findings on Barriers

Summary of findings:

- **Barriers could not be adequately measured as most respondents represent sites that were able to overcome barriers to engagement with MarinTrust activities, such as costs or capacity.**
- **Improver Programme participants indicated they did not find becoming certified too expensive or too stringent.**

Generally, barriers to participating in MarinTrust activities could not be adequately measured, as the findings solely represent Certified Sites and Improver Programme Sites who have already overcome potential barriers like costs or capacity. That being said, some conclusions may still be drawn regarding barriers to participate in the Improver Programme as well as to become MarinTrust-certified after being an Improver Programme participant.

Regarding barriers to participate in the Improver Programme, 15% of Certified respondents that indicated why they did not participate in the Improver Programme indicate they don't know enough about it, and 5% indicated they consider the Improver Programme too complex. While these barriers were reported to a lesser extent than that lack of motivations were reported (most commonly sites didn't participate because they had sufficient raw materials). One certified respondent noted a perceived hurdle to participation because "the Improver Programme depends heavily on government management".

Regarding potential barriers for Improver Programme Sites to become MarinTrust certified. Barriers that were tested related to the costs and certification requirements. Regarding costs, none of the respondents said obtaining MarinTrust Certification would be too expensive[1]. However, one respondent did indicate difficulties with the cost structure of the Improver Programme participation.

[1] More information on costs of MarinTrust Certification or Improver Programme participation can be found on the MarinTrust website [here](#).

When asked about the expectation of meeting all MarinTrust Certification criteria, a minority (28%) expressed concern that the MarinTrust Fishery Assessment may be considered too stringent. However, these same respondents do expect that participation in the Improver Programme may help them become MarinTrust certified, demonstrating an optimism towards its achievability. In comments or interviews no further barriers were mentioned or explained in more detail.

While the participation among Non-Engaged Sites was insufficient to draw general conclusions, in this context it is worth noting that the 2 respondents among this survey group also indicated they did not consider the MarinTrust Certification to be too expensive, nor did they consider the Fishery Assessment or Site Audit to be too stringent for their site. This makes the total number of respondents that confirm these responses 7 Sites, namely 5 in the Improver Programme and 2 Non-engaged.

In the next sections

This is the end of the findings. The next section provides a summary of the findings, followed by Recommendations made for future Impact Evaluations.

If you would wish to learn more about the surveys that served the findings in this section, it is recommended to review [Annex B: Survey Questions.](#)



CONCLUSION

Impact Evaluation examined the hypothesis "MarinTrust activities lead to improved or protected environmental parameters.". Beyond assessing assumed improvements or protections in environmental parameters, the Impact Evaluation delved into unintended effects, motivations, drivers, and barriers associated with MarinTrust's activities. Following an examination of 47 surveys, 8 interviews, national legislation across 11 represented countries and sourcing policies of 38 (potential) customers in feed or petfood production, it appears evident that MarinTrust activities do contribute to improved or protected environmental parameters in marine ingredients production.

Improvements were reported by the majority of respondents across all environmental performance areas worked on through the MarinTrust activities. Most improvements appear to relate responsible sourcing and traceability of fishery materials, while impacts on minimising negative impacts or species' habitats and ETP-species appear less pronounced. For any areas, a minimum of 71% and a maximum of 94% of respondents agreed or strongly agreed that improvements were made. This appears plausible, considering a legal review demonstrated that for the included countries, MarinTrust's requirements to become Certified or an improver Programme participant, mostly offer a higher level of environmental protection than national or regional legislation in the field of IUU-fishery materials, traceability or materials and emissions.

Evaluation of stakeholder influences highlights the pivotal role of customers in driving engaged with MarinTrust activities, where the majority of customers (by volume) appears to ask for MarinTrust certified materials (71%), and 43% for Improver Programme materials. Direct competitors and shareholders (if applicable) also appeared to influence respondents, with government and local community influence perceived to be comparatively lower. Final stakeholders whose influence was examined, NGOs, workers and suppliers, ranged somewhere in the middle, resulting from some countries reporting a high level of influence and others reporting no influence.

Motivations for engaging with MarinTrust activities are multifaceted, ranging from customer acquisition to less commercial motivations such as stewardship for responsible marine ingredients. Generally, findings suggest a strong belief among respondents that engagement with the activities offers competitive advantages and aligns with responsible practices.

Barriers to becoming MarinTrust-certified were not found among the respondents, but this should be seen as the result of the fact that all respondents represent either a Certified Site or Improver Programme Site (see previous limitation), meaning there are limited (2) responses from those who have been unable to overcome barriers like costs or capacity (i.e. non-engaged sites). Barriers to participating in the MarinTrust Improver Programme were found, particularly confusion around the Programme and a limited knowledge. These barriers were mostly found in countries where the Improver Programme does not have approved sites (yet), but addressing these barriers nonetheless appears important to expand participation in the Improver Programme.

In conclusion, the findings underscore strides were made in enhancing environmental responsibility through MarinTrust activities. While there are areas for improvement and challenges to overcome, the overall trajectory towards reported improvements and clear motivations and drivers is promising.

RECOMMENDATIONS FOR FUTURE IMPACT EVALUATIONS

1 Continuously build on understanding legal requirements

A continuous building on legal knowledge in the main target countries is expected to support future Impact Evaluations, as well as support outreach and communications regarding MarinTrust Certification and the Improver Programme. A starting point has already been made for this Impact Evaluation, but given the limited capacity in this Impact Evaluation, building this understanding will require further research in the future.

2 Capture improvements made during the Certification Process or Improver Programme onboarding.

Non-conformities corrected during the auditing process are not included as data in this Impact Evaluation due to confidentiality. While reports on non-conformities are already published by MarinTrust on a regional level, reviewing this data on a site-level could unveil improvements attributable to MarinTrust activities. Considering the list of non-conformities during the audit would be drafted by an independent auditor, not MarinTrust or the site, it provides very valuable input on improvements made. Following site-level analysis, information could be grouped again to maintain the anonymity of site data, as done for this Impact Evaluation.

3 Work with multiple evaluation cycles

Scope of this Impact Evaluation was rather broad, thus requiring a more superficial review of respondents. This combined with a relatively small sample size available makes it challenging to interpret data on the basis of commonalities as those found can also be seen as anecdotal evidence. Considering MarinTrust's ambition to include social parameters for future Impact Evaluations, thus making the scope even broader, MarinTrust may consider setting up designated Impact Evaluations or feedback mechanisms for different data elements to increase the value and depth of the gained insights.

4 Build a feedback loop

It is strongly recommended that the Impact Evaluations do not represent the only time there is direct interaction with Certified or Improver Programme factories on their experiences and feedback. It is expected that goodwill may be lost if respondents will not notice responses to their provided feedback, as it does require time to contribute to the Impact Evaluations. This may pose a risk to future Impact Evaluations. It is recommended to explicitly show how opportunities for improvements were addressed and if not, to provide a rationale for existing practices.

5 Continue to work with multiple languages

Surveys were offered in English, Spanish, French, Vietnamese and Thai, and interviews were offered in English and Spanish. While it required significant effort to offer participation in multiple languages, it is expected that this increased participation, particularly among Francophone and Vietnamese-speaking representatives. Offering equal chances to participate to at least 74% of representatives fits the global character of MarinTrust. To make working with different languages more efficient, MarinTrust may consider (digital) tools that simplify working with data collection and analysis in multiple languages.

6 Increased outreach to customers

Review of customers asking for MarinTrust materials was conducted for this Impact Evaluation and showed there was potential to increase the understanding and uptake of MarinTrust's activities among purchasers of marine ingredients. This includes petfood companies and aquaculture feed producers. This should serve not only to increase the uptake, but also to understand when and why site customers don't ask for MarinTrust, as this is still unknown for many customers. It is recommended to engage purchasers directly or by leveraging initiatives like the Seafood Task Force and Sustainable Petfood Coalition. Impact of strengthened market engagement can be tested during future Impact Evaluations.

ANNEX A: ABOUT THE AUTHOR

Eva van Heukelom holds a Bachelor's degree in Law, earned in 2014, followed by a Master of Laws (LLM) specializing in Public International Law and International Trade and Investment Law from the University of Amsterdam, where she graduated cum laude in 2017.

With over five years of experience as an independent consultant, Eva works in the field of sustainable seafood, with a focus on legal assessments, quality assurance and environmental impact assessments. She has worked with organisations such as the Global Sustainable Seafood Initiative (GSSI), the Good Fish Foundation, and Global Fishing Watch.

Eva speaks English, Spanish, and Dutch, enabling effective collaboration across international projects. Her work spans multiple research projects, particularly focusing on the impact of European Union Fisheries Agreements and Life Cycle Assessments (LCAs).

ANNEX B: SURVEY QUESTIONS

Three survey groups:

1. Certified Sites
2. Improver Programme Sites
3. Non-Engaged Sites

General structure:

Section 1: respondent-specific questions

Section 2: environmental performance

Section 3: unintended effects, drivers, motivations and barriers*

**Please note some elements of these sections only apply to certain groups, for instance unintended effects only apply to Survey Group 1: certified sites.*

Survey Group 1: Certified Sites

Section 1: Tell us about your factory

*Required question

This section includes a few questions to get to know your factory better.

1. Information about respondent*

Name of company [Text Field]

Name(s) of factory [Text Field]

Name of representative [Text Field]

Position of representative [Text Field]

Email of representative [Text Field]

2. **Representative has worked at factory for*:** [multiple choice, options: 0-1 year / 1-4 years / 5-10 years / 10+ years]

3. **Did you personally play a role in achieving MarinTrust certification? ***
[multiple choice, options: [Yes / No / No because I didn't work at the factory at this time]

4. **Factory has been operational since (year)** [Text Field]

5. **Annual production (in MT)**

[multiple choice, options: 0-9,999MT / 10,000-29,999MT / 30,000+ MT]

6. Number of fulltime staff at site*

[Text Field]

7. Type of customers (multiple answers can be selected) *

[Multiple choice, options: aquaculture feed plant, pig and poultry feed, pet food producers, supplement plant, cosmetics plant, other]

8. Are you currently part of the MarinTrust Improver Programme?*

[Yes / No / I don't know]

If you answered "Yes", what motivated you to join?

- We needed more responsible raw materials
- We believe in the goals of the Improver Programme
- A stakeholder encouraged us
- I don't know
- Other:

If you answered "No", what's the reason?

- We don't know enough about the Improver Programme
- We have sufficient supply of raw materials approved against the MarinTrust Fishery Assessment
- We find the Improver Programme too complex
- We have participated in the past and are now MarinTrust-certified
- I don't know
- Other:

Comments to add to responses in Section 1

[Text field]

Section 2: Questions about your environmental policies

This section includes 4 questions to help assess how MarinTrust has influenced your factory's environmental practices. Questions ask you to indicate, to the best of your knowledge, the applicability of statements for your factory. Text boxes are provided to provide further information and feedback.

10.* Please evaluate the following statement: "To become MarinTrust-certified, our factory improved in the following areas":

[Drop down with Likert scale options: Strongly disagree, Disagree, Agree, Strongly Agree]

- A. Responsibility of sourced fishery materials (incl. by-products) (section 1, 4)
- B. Traceability of sourced fishery materials (section 2)
- C. Responsible Manufacturing Practices (food safety) (section 3)
- D. Responsible Manufacturing Practices (other issues) (section 3)
- E. Formalised procedures for sourcing fishery material (section 1)
- F. Formalised procedures for compliance with national legislation on emissions (section 6)

Comments to add to response: [Text field]

The next 2 questions serve as a follow-up to the previous question. To the best of your knowledge, please provide insight in the following.

11.* To what extent have these areas been improved to become MarinTrust-certified?

[Drop down with Likert scale: not at all, to some extent, to a large extent, to a very large extent]

Whole fish fishery:

- A. We can demonstrate that fishery materials are legally caught (1.4.3.1; 1.1)
- B. We have a system to know from which fishery the materials were sourced (traceability) (1.4.1; 2.1.1.)
- C. We have a record available for each landing of whole fish (1.4.2)
- D. We have details on the vessel that caught the fishery materials, such as name/owner of vessel, quantity, species, location (1.4.3)
- E. Fishery materials come from a managed fishery (1.3.1.1)
- F. Fishery materials only include species that are not overfished (1.3.2)
- G. Fishery materials caught with minimal negative impact on endangered or protected species (1.3.3.1)
- H. Fishery materials caught with minimal negative impact of fishery on the species' habitat (1.3.3.2)
- I. Fishery materials caught with minimal negative impact of fishery on ecosystem (1.3.3.3)

By-products from fisheries:

- A. By-products are not from endangered or protected species (4.1.2)

Comments to add to response: [Text Field]

12.* Select which policies & procedures were added to become MarinTrust-certified (Multiple answers can be selected):

- Sourcing policy that commits factory to sourcing of environmentally responsible fishery products (1.2.1)
- Procedure to demonstrate the fishery materials are legally caught (1.1; 1.4.3.1; 2.1.2)
- Policy to demonstrate compliance with applicable national legislation on emissions (6.1)
- Policy to demonstrate emissions to air (6.2)
- Policy to demonstrate emissions to water (6.2)
- Policy on release of toxic or dangerous substances (6.2)
- Policy on noise, smell and dust pollution (6.2)
- Policy on ground pollution (6.2)
- Policy to formulate action plans to address if internal procedures were not followed (6.3)
-

Comments to add to response: [Text Field]

Section 3: Questions about your motivations to become MarinTrust-certified

Help us understand your motivations for becoming MarinTrust-certified with these final 4 questions. Text boxes are provided to provide further information and feedback.

**13.* To the best of your knowledge, make an estimate on the following:
What percentage of your customers (in volume) ask for MarinTrust-certified materials?**

[Scale with %]

I don't know

What percentage of customers (in volume) find the Improver Programme materials an acceptable alternative for certified materials?

[Scale with %]

I don't know

Comments to add to response: [Text Field]

14.* To what extent have these stakeholders influenced your factory's decision to become certified?

[Likert scale with dots: no influence, some influence, large influence, very large influence, N/A]

- A. Government
- B. Workers
- C. Shareholders
- D. Customers
- E. Suppliers
- F. NGOs
- G. Local community
- H. Direct competitors

Comments to add to response: [Text Field]

15. *Select true or false for the following statements (unintended effects)

As a result of becoming MarinTrust-certified: [True/False]

- Our factory receives a higher price for its products
- Our factory gained access to markets and/or customers
- Our factory lost access to markets and/or customers
- Our factory uses less energy and/or water
- Our factory has attracted more potential investment
- Our factory has more sense of stewardship and pride
- Our factory has less room/interest to innovate
- Our factory's costs increased

Comments to add to response: [Text Field]

16.* Select true or false for the following statements regarding MarinTrust certification [True/False]

- A. Being MarinTrust-certified is the right thing to do.
- B. Our factory wants to retain MarinTrust certification even if no customer asks for it
- C. We expect that being MarinTrust-certified will help us acquire new customers
- D. We expect that being MarinTrust-certified will help us retain our customers
- E. Being MarinTrust-certified gives our company a competitive advantage over our direct competition.
- F. We do not see sufficient benefit in being MarinTrust-certified and are not planning to retain the certification

Comments to add to response: [Text Field]

This is the end of the survey.

Survey Group 2: Improver Programme Sites

Differences:

- Removal of by-products question under Q12
- "to participate in MarinTrust Improver Programme" instead of "to obtain MarinTrust Certification"
- Question on unintended effects removed
- Question on motivations to obtain certification added (below)

Select true or false for the following statements about the MarinTrust Certification Programme: [True/False]

- Our goal is to become MarinTrust-certified
- Participating in the MarinTrust Improver Programme helps us to become MarinTrust-certified
- Participating in the MarinTrust Improver Programme lowers the pressure to become MarinTrust-certified
- Becoming MarinTrust-certified is too expensive for our factory
- We do not see sufficient benefit in being MarinTrust-certified and are not planning to get the certification
- The MarinTrust Fishery assessment is too stringent for our factory

Survey Group 3: Non-Engaged Sites

Differences:

- "I expect our factory could become MarinTrust Certified in the area of" instead of "our factory improved to obtain MarinTrust Certification in the area of"
- Question on unintended effects removed
- Question on motivations to obtain certification added (below)

16.* Select true or false for the following statements [True/False]

- Getting MarinTrust-certified is too expensive for our factory
- We do not see sufficient benefit in being MarinTrust-certified and are not planning to get the certification
- MarinTrust Fishery assessment (step 1) is too stringent for our factory
- MarinTrust Site Audit (step 2) is too stringent for our factory

