



# Recognition determination report Chile PAC

Document TEM-035 – Version 1.0

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**Prepared by:** Jocelyn Amponsa-Atta, Assurance Officer  
**Reviewed by:** Laura Courage, Assurance & Risk Manager  
**Approved by:** Laura Courage, Assurance & Risk Manager

## Introduction

To ensure consistency in the reporting of findings and recommended outcomes, this report is to be utilised by the approved third party following the completion of the equivalence assessment

The report provides a summary of key information and findings of the equivalence assessment carried out by the third party.

Upon receipt of the recognition determination report, MarinTrust shares the report with the relevant governance committee for discussion and recommendation of approval to the Governing Body Committee (GBC).

This report is used as the basis for recommending if the equivalency should be considered by the relevant committee, GBC, and MarinTrust.

Where the recognition is partial or full, MarinTrust shall publish the report on the MarinTrust website.

## Section 1: Company and third-party information

Company details	
<b>Name of Organisation:</b> Sernapesca (National Fisheries and Aquaculture Service)	
<b>Type of recognition:</b> Standard owner for Section 5 - GMP	
Third party Information	
I hereby undertake to maintain in confidence all information and data related to MarinTrust activities obtained during the course of my involvement as a third party, other than that which I am authorised by the MarinTrust to disclose or that which I am required to disclose by law.	
I further undertake to immediately inform MarinTrust of any conflict of interest that may arise between my responsibilities as a third party and any other activity with which I may be involved.	
<b>Organisation:</b>	<b>RS Standards</b>
<b>Date:</b>	<b>05 June 2024</b>

## Section 2: General overview

### One-way or mutual recognition

- One-way  
 Mutual

Standard / Benchmark information	
<b>Title</b>	The Safety and Certification Manual
<b>Version</b>	Updated 11/06/2024. The various manuals within the overall system are dated at various timescales. All versions were as available in May 2024.
<b>Website link (if applicable)</b>	<a href="https://www.sernapesca.cl/manuales_y_publicaciones/manual-de-inocuidad-y-certificacion/">https://www.sernapesca.cl/manuales_y_publicaciones/manual-de-inocuidad-y-certificacion/</a>

## Section 3: Self-assessment outcome summary

This equivalency assessment was undertaken by third party assessment only. This is due to MarinTrust deciding to complete the assessment, due to:

- the Chile PAC is an important standard for MarinTrust certificate holders in Chile, and
- the PAC was recognised under a previous MarinTrust Standard (V2) and it was deemed essential for this equivalency to continue.

A third party contractor (RS Standards) has undertaken this equivalency assessment in full, during May-June 2024. This compared V3 of the MarinTrust Standard for Responsible Sourcing of Marine Ingredients (the Standard) and the Chile PAC, which was published and online at the time of the assessment. RS Standards has considerable experience in benchmarking and equivalency, as well as MarinTrust standards.

The PAC and supporting documents are published in Spanish and were translated using Google translate. Communication was received from a member of the Sernapesca team, however the majority of the assessment was undertaken using translated online resources.

The PAC covers good manufacturing practices (GMP) and was assessed only against assurance requirements and against Section 5 of the MarinTrust Standard.

## Section 4: Equivalency assessment overview

The outcome of the equivalency assessment is summarised in the tables below. **Table 1** includes an overview of the outcome of the baseline requirements

**Table 3** indicates the number of clauses for which the relevant party is equivalent, partially equivalent, not equivalent, or not applicable to the MarinTrust criteria.

For full details for each rating, please refer to Recognition of Equivalence Procedure, Appendix 1 – equivalency assessment methodology.

### 3.1 Baseline requirements

**Table 1: Outcome overview of baseline requirements**

Requirement	Description	Outcome
<b>Operations</b>	Fully operational	Baseline met
	Third party assessments or audits included	
<b>Scope of requirements (please specify)</b>	Good Manufacturing Practices	Baseline met
<b>Geographical scope (if regional please specify)</b>	Regional Chile	Baseline met
<b>If the scope is fisheries - are the requirements aligned with the FAO Code of Conduct for Responsible Fisheries?</b>	Not applicable	Not applicable

It is evident that the scheme overall is a legal requirement, and for marine ingredients producers is essential to operate a marine ingredient facility in Chile. The overall scheme has a long track record, being in place for over 30 years and constantly updated. It is also subject to third party assessments

by governments such as the USA, EU, and Canada, when they wish to verify that Chile is fulfilling requirements for export markets.

**Table 2: Outcome overview of ISO/IEC 17065 requirements**

Requirement	Outcome
Standard Owner	Alignment established
Benchmark Tool Owner	Not applicable

As the Chile PAC is a voluntary programme within the broader requirement for licensing and approval of marine ingredient plants in Chile, there is no ISO based assurance model used. As such, a detailed review of the assurance system was undertaken.

As a government department, Sernapesca have effective layers of oversight in place. This covers the everything from management oversight, resourcing, management and implementation of the process, managing and conducting audits, through to addressing non-conformities. Audits are undertaken by an independent third party (the University of Chile).

Evidence of assurance was found in a number of documents relating to the scheme and the way it is managed. On the basis of this evidence it was deemed that the Chile PAC provides an equivalent level of assurance as a scheme that operates to ISO/IEC 17065.

Full details are provided in the assessment document.

### 3.2 Equivalency assessment against MarinTrust criteria

**Table 3: Summary of level of equivalency**

Scope	Total Number of criteria	Equivalent	Partially equivalent	Not equivalent
Good Manufacturing Practices	76	90.8% (69 clauses)	9.2% (7 clauses)	0

There are several documents that companies are required to use and understand, and these cover all the details against which inspections and audits are undertaken. The Chile PAC is fundamentally a way to demonstrate compliance with legal requirements and there are specific sections covering different types of business operators, as well as general requirements for HACCP, quality management etc.

Within the overall scheme there are six parts each covering different technical areas. Part 2 Rules and Procedures is comprised of 6 sections covering detailed activities such as process control, sampling

and analysis, auditing and inspection. Across the six Parts and their respective subsections, it was possible to identify requirements that aligned with the requirements of MarinTrust Section 5.

On the basis of these documents it was deemed that the Chile PAC provides a very high level of equivalence to Section 5 of the MarinTrust standard. Where there are gaps, it is recommended that these be audited as part of MarinTrust audits.

### 3.3 Extent of Equivalence

**Table 4: Equivalency assessment outcome**

Overview	
Scope	Outcome
Good Manufacturing Practices	Partial recognition recommended

### 3.4 Main Findings and Comments

There is an extremely high level of equivalency between PAC and MarinTrust Section 5. Coupled with the oversight by the Chilean government which has equivalent levels of assurance, there is clear justification for PAC to be partially recognised for Section 5.

#### Partially equivalent clauses

There are 7 clauses that are partially equivalent (see below).

No.	Clause from MarinTrust Section 5	Rationale why PAC is partially equivalent
5.3.1.4	There shall be effective lighting (natural or artificial) to ensure activities can be undertaken safely and efficiently.	There are requirements for facilities, but they do not cover lighting.
5.3.4.4	Food preparation and serving areas should comply with workplace food safety requirements.	There are no specific requirements for food preparation and serving areas, just general; requirements that food storage has to be separate from changing rooms.
5.3.4.5	There shall be designated areas for staff to hygienically store and consume their own food items.	There are requirements for food storage to be away from changing rooms, but it does not specify what this looks like
5.3.4.6	The Facility shall ensure potable drinking water is available for all employees and any food or beverages it provides to employees are nutritious and safe to eat and/or drink.	There are requirements for potable water to be safe, but it does not specify that this shall be freely available for employees. There are no provisions for food or beverages for staff.
5.3.5.5	Where air is used for conveying or cooling, the facility shall evaluate the risk of this becoming a contamination route for	Controls over air flow are included but it appears to relate to general air flow rather than for conveying or cooling.

	pathogens and take any necessary precautions.	
<b>5.3.10.3</b>	Samples of the finished materials shall be labelled to facilitate traceability and retained in appropriate conditions for a minimum period of six months.	PAC requires 60 days retention for official samples.
<b>5.4.1.3</b>	Each marine ingredient product shall have a written specification that is made available to purchasers and potential purchasers of the marine ingredients offered by the Facility.	The requirement for specifications is not explicit. The HACCP section refers to written details of all products but does not require this to be shared.

The current assessment for Section 5 and Chile PAC does show a higher degree of equivalency than in previous assessments. This is because this is a new version of the MarinTrust standard, and the clauses have been revised to be much more aligned with general GMP requirements and expectations.

## Section 5: Response from scheme/standard owner

SERNAPESCA were provided a 2-week comment period to provide further information and evidence in relation to the assessment. No further comments or information was received

## Section 6: Equivalency recommendation

- No recognition recommended
- Partial recognition recommended
- Full recognition recommended

The 'partially equivalent' clauses should be included in MarinTrust audits in Chile, as they are requirements of the MarinTrust Standard.