



Recognition determination report
FEMAS Standard 2019
V2.1 – August 2021

Document TEM-035 – Version 1.0

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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	
Name of Organisation:	Agricultural Industries Confederation (AIC)
Type of recognition:	Standard owner – GMP Section 5
Third party Information	
<p>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.</p> <p>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.</p>	
Organisation:	RS Standards
Date:	05 June 2024

Section 2: General overview

One-way or mutual recognition

- One-way
 Mutual

Standard / Benchmark information	
Title	Feed materials Assurance Scheme (FEMAS) Standard 2019
Version	V2.1 – August 2021
Website link (if applicable)	https://www.agindustries.org.uk/sectors/trade-assurance-schemes/femas-feed-materials-assurance-scheme.html

Section 3: Self-assessment outcome summary

This equivalency assessment was undertaken by third party assessment only.

A previous evaluation of FEMAS was made as part of a series of pilot tests for the development of the equivalency procedure. This was considered a type of 'self-assessment' whereby information was gathered prior the full equivalency assessment.

A third party contractor (RS Standards) has undertaken this latest 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 FEMAS Standard V2.1, 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 FEMAS Standard and supporting documents are published online.

The FEMAS Standard covers good manufacturing practices (GMP) and was assessed only 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 considered to be 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
Operations	Fully operational	Baseline met
	Third party assessments or audits included	
Scope of requirements (please specify)	Good Manufacturing Practices	Baseline met
Geographical scope (if regional please specify)	Global	Baseline met
If the scope is fisheries - are the requirements aligned with the FAO Code of Conduct for Responsible Fisheries?	Not applicable	Choose an item.

Table 2: Outcome overview of ISO/IEC 17065 requirements

Requirement	Outcome
Standard Owner	ISO/IEC 17065 assurance model implemented
Benchmark Tool Owner	Not applicable

Section 1.3 of the Standard states: FEMAS is a Product Certification Scheme delivered by a Certification Body accredited to International Standard ISO/IEC 17065.

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	88.2% (67 clauses)	9.2% (7 clauses)	2.6% (2 clauses)

There are several documents which cover all the details against which inspections and audits are undertaken. The main feed standard is supplemented with other standards specifically for fishmeal and fish oil.

On the basis of these documents it was deemed that the FEMAS Standard V2.1 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 FEMAS and MarinTrust Section 5. Coupled with the assurance model, there is clear justification for FEMAS to be partially recognised for Section 5.

Partially equivalent clauses

No.	Clause from MarinTrust Section 5	Rationale why FEMAS is partially equivalent
5.3.4.3	Suitable and sufficient changing, rest and catering facilities shall be provided for all staff.	FEMAS includes catering facilities, however it does not include changing/rest facilities.
5.3.4.4	Food preparation and serving areas should comply with workplace food safety requirements.	FEMAS requires controls for eating and drinking areas, however it is not to the same level of detail.

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.	FEMAS has general requirements for water, that partially covers this clause, but it does not state this must be freely available to employees. It does not cover nutritional aspects.
5.4.1.5	The intended use of marine ingredients shall be considered and maintained as documented information (crude fish oil for human consumption / marine ingredients for feed purpose)	HACCP principles require to define the intended use of products, however FEMAS does not specify it in detail, for this reason it is partially meets.
5.4.1.7	The HACCP flow chart shall be reviewed in situ to ensure that it is an accurate representation of the Facility's production process.	The verification of flow chart is part of the HACCP methodology itself, however FEMAS does not specify the in-situ review.
5.4.3.2	The identification shall be performed based on: <ul style="list-style-type: none"> • preliminary information, • experience, • internal and external information, including epidemiological, scientific and historical background, • information from the marine ingredient chain (from raw materials until end products), and • legal, regulatory and customer requirement. 	Hazard identification is part of the HACCP principles and should be considered solid information related the products/ processes, however FEMAS does not have detailed information.
5.4.9.2	If validation shows control measures(s) are ineffective, the Facility shall modify and reassess the control measure(s) and/or combination of control measure(s). Documented validation methodologies and evidence shall be maintained.	FEMAS does require the identification of control measures, validation processes, and corrective actions; however, it only mentions details for biological hazards.

Not equivalent clauses

5.5.1	The Facility shall have a documented review of threats and vulnerabilities to protect the integrity of products intended for human consumption.
5.5.2	This review shall be updated at least annually.

As FEMAS is a feed standard it would not include requirements for products for human consumption. FEMAS does have TACCP and VACCP requirements for feed products, but this is not covered in Section 5 of V3.

Section 5: Response from scheme/standard owner

FEMAS were provided a 2-week comment period to provide further information and evidence in relation to the assessment. The scheme owner noted that they are in the process of implementing an updated Standard. The new FEMAS 2024 will address some of the areas of partial / not equivalency.

Section 6: Equivalency recommendation

No recognition recommended

Partial recognition recommended

Full recognition recommended

The 'not equivalent' and 'partially equivalent' clauses should be included in MarinTrust audits in facilities which also hold FEMAS V2.1 certification as they are requirements of the MarinTrust Standard.

If a facility seeking MarinTrust certification produces marine ingredients for both food and feed use, the clauses 5.5.1 and 5.5.2 should also be audited for marine ingredients destined for human consumption.