

## Overview:

Table 1 below provides a summary of the level of equivalency of the Chilean PAC standard determined against the MarinTrust Standard, Section 3.2.

**Table 1: Summary of level of equivalency**

Level of equivalence	Number in each level
Exceeds	0
Equivalent	79
Partially Equivalent	6
Not Equivalent	5
Not Applicable	12
<b>Total number of clauses</b>	<b>102</b>

The table shows that 79 of the Chilean PAC requirements have direct equivalency with MarinTrust clauses, whilst 12 have been classified as 'not applicable' as these pertain to specific MarinTrust requirements outside of the scope of the Chilean PAC. 6 are partially equivalent and 5 are not equivalent.

For the clauses noted as partially or not equivalent, it is expected that there are similar requirements in other areas of Chilean law, therefore, there is a justification for the full recognition of the Chilean PAC certification by MarinTrust, with the following conditions:

1. An auditor shall confirm that for all clauses noted as 'Partially Equivalent' or 'Not Equivalent' are being met as part of the MarinTrust audit.
2. Factories will continue to be required to meet MarinTrust Chain of Custody and raw material sourcing requirements.

Tables 2 – 7 provides an overview of some of the key equivalency result changes between the previous benchmark conducted in 2019 and recent benchmark.

**Table 2:**

The following clauses previously noted as not equivalent or partially equivalent, are now fully equivalent:

Clause No.	Requirement
3.2.1.5.1	Protective clothing shall be worn where the applicant has determined that there is a risk to personnel health and safety
3.2.4.4	Checks on dosing rates, calibration and control shall be recorded and maintained
3.2.4.7	Where mechanical drying of marine ingredient is undertaken; documented procedures shall ensure that it does not cause adverse effects on the marine ingredient safety
*3.2.8.2	For marine ingredients sold in bulk, as well as in bags, delivery documents / labels shall include any details (such as Statutory Statements) required under Labelling Regulations in the country of production and / or receipt
*3.2.10.3	The participant shall ensure that all intake and loading facilities are designed and constructed in a manner that maintains the safety of marine ingredients materials.
*3.2.16.2	Inspections shall include, as appropriate, assessment of physical form; odour; contamination by insect pests, droppings and other extraneous matter; mould; and compliance with specification.

**Table 3:**

The following clauses previously noted as fully equivalent, are now partially equivalent:

Clause No.	Requirement
3.2.3.3	There shall be procedures in effect for visitors and subcontractors to ensure the integrity of the product based on risk assessment.
3.2.4.6	Fixtures in process and storage areas that contain glass shall be protected to minimise the risk of contamination in the event of breakage.
3.2.7.3	Facility sewerage shall be contained by a separate closed system to that of the processing drainage system.

**Table 4:**

The following clauses maintain not equivalent status:

Clause No.	Requirement
3.2.9.4	Environmental analysis for salmonella sp. shall be carried out in fishmeal storage areas according to the HACCP based risk assessment.
3.2.10.2	Where the conditions of transport may present a risk to contamination, loading shall not take place until a thorough risk assessment, appropriate tests and corrective action have taken place to ensure that marine ingredients shall not be adversely affected.
3.2.10.2.1	The results of these mitigating activities shall be recorded.
3.2.15.1	Each marine ingredient product shall have a written specification that is made available to purchasers and potential purchasers of the marine ingredients' materials offered by the participant.

**Table 5:**

The following clauses maintain partial equivalence status:

Clause No.	Requirement
3.2.1.4	There shall be adequate lighting to ensure activities can be undertaken safely and efficiently.

**Table 6:**

The following clauses have change from partial to not equivalent:

Clause No.	Requirement
3.2.4.8	In cases where air is used for conveying or cooling, the participant shall evaluate the risk of this becoming a contamination route for pathogens and take any necessary precautions.

**Table 7:**

The following clauses have change from not equivalent to partial:

Clause No.	Requirement
<b>3.2.16.3</b>	Samples of the finished materials shall be labelled to facilitate traceability and retained in appropriate conditions for a minimum period of six months
<b>3.2.16.4</b>	Applicants shall undertake sampling and analysis of marine ingredients to establish that it meets the statutory standards for the permitted concentration of an additive such as antioxidants.

The previous recognition report identified a total of

- 18 clauses that were partially or not equivalent,
- 1 clause a non-applicable

Whereas in the recent equivalency report identifies a total of

- 11 as partially or not equivalent
- 12 as non-applicable

The reason for these differences can be attributed to

- Changes in wording and addition of new content in the Chilean PAC
- During the recent equivalency benchmark exercise, it was ensured that only general requirement, or specific to fishmeal / rendering / not direct human consumption etc were included. Ther are specific and most relevant to the activities of the facility undergoing audit for MarinTrust certification.