SSC Implementation Report 2020

Report *by* Charmelian

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Acronym's and definitions

Acronym	Definition
ASC	Aquaculture Stewardship Council
BAP	Best Aquaculture Practices
BRC	British Retail Consortium
BSCI	Business Social Compliance Initiative
CBs	Certification Bodies
CSR	Corporate Social Responsibility
ETI	Ethical Trade Initiative
FAD	Fish Aggregating Device
FIP	Fishery Improvement Project
GAA	Global Aquaculture Assurances
GDST	Global Dialogue on Seafood Traceability
GSSI	Global Sustainable Seafood Initiative
IFFO RS	*Now referred to as Marin Trust*
ISEAL	The global membership organisation for credible sustainability standards
IUU	Illegal Unreported Unregulated
KT	Key Traceability
MCS	Marine Conservation Society
MSC	Marine Stewardship Council
NGO	Non-Governmental Organisation
ODP	Ocean Disclosure Project
PVR	ProActive Vessel Register
SEDEX	Supplier Ethical Data Exchange
SFP	Sustainable Fisheries Partnership
SSC	Sustainable Seafood Coalition

Acknowledgement

1   Introduction, Scope and Objectives

1.1   Background

The Sustainable Seafood Coalition's (SSC) vision is that all fish and seafood sold in the UK is from sustainable sources. There are seven aims to help achieve this:

1. To promote responsible and sustainable fish and seafood consumption.
2. To support a wide range of responsibly sourced seafood in the UK market.
3. To commit to the SSC Voluntary Code of Conduct on environmentally responsible fish and **seafood sourcing**.
4. To commit to the SSC Voluntary Code of Conduct on **environmental claims**.
5. To influence changes in policy relevant to seafood sustainability at UK, EU and international level, where deemed appropriate by members.
6. To build national and global alliances.
7. To inform the public debate on seafood.

As a means to achieve these aims, there are two voluntary SSC Codes of Conduct relating to responsible sourcing and labelling plus also a guidance document that elaborates on the Codes.

The Labelling Code: The SSC aims to create harmonised seafood labelling that will provide consumers with accurate information on the provenance and sustainability of the fish or seafood. The Voluntary Code of Conduct on Environmental Claims (Labelling Code) is designed to achieve this.

The Sourcing Code: A primary goal of the SSC is to ensure that consumers can have confidence that the seafood they are buying meets or exceeds minimum standards of responsibility. The Voluntary Code of Conduct on Environmentally Responsible Fish and Seafood Sourcing is designed to achieve this.

Together, the Codes are tools for change and contribute to the vision for all fish and seafood sold in the UK to be from sustainable sources. The Codes represent commitments SSC members have agreed to adhere to, irrespective of size or sector, and set a precedent for industry best-practice. The SSC Codes are without prejudice to national, international or other laws or regulations.

The SSC Members (as listed below) are retailers, food service, suppliers and producers of seafood in the UK market, plus organisations with an interest in promoting sustainable seafood. New members are given a one year 'implementation period' in which to align their sourcing and labelling practices with the Codes. The 27 commercially-active SSC Members that have been members for longer than one year have been included in this Implementation Report.

Table 1: SSC Membership

Associated Seafoods	**Bidfood**	**BRC**	**Client Earth**	**Co Op**
D & A Seafood	**Direct Seafoods**	**Flatfish Ltd**	**Fowey Shellfish Co.**	**Fuller's**
Harrods	**Hilton Seafood UK**	**Iceland**	**itsu**	**Joseph Robertson**
Kingfish Zeeland	**Libra Seafoods**	**Lidl**	**Lovering Foods**	**Lynx Purchasing**
Lyons Seafood	**M&S**	**Meridian Sea**	**Morrisons**	**National Federation of Fish Friers**
New England	**Offshore Shellfish**	**Ramus Seafoods**	**Sainsbury's**	**Seafresh Group**
Sustainable Restaurant Ass'n	**Tesco**	**The Big Prawn**	**The Happy Prawn**	**The UK Seafood Industry Alliance**
Waitrose	**Whitby Seafoods**	**World Wise Foods**	**Yo! Sushi**	**Young's**

1.2 Objective

The SSC implementation report 2020 aims to assess the success of the SSC model and the consistency with which the Codes are being implemented. The report is intended for SSC Members and secretariat, to measure and continually improve performance of the Codes; as well as other industry and NGO stakeholders, to improve understanding of the SSC model and its efficacy. Lastly the report is for members of the public who may wish to verify public commitments made by SSC Members within on-pack environmental claims or public-facing sourcing policies.

To undertake this evaluation, it was agreed to carry out two consultations with participating SSC Members, plus one-to-one interviews to follow-up with clarifications. Based on the information provided, alignment with the SSC Codes was evaluated, approaches of the Members compared and findings identified which relate to promoting the SSC objectives.

1.3 Project team

This report has been written by team Charmelian, a collaboration between Melanie Siggs, Charlotte Tindall and Iain Pollard. The consortium is represented by consultancy company Key Traceability (KT) for administrative purposes. KT is a consultancy company registered in England on 12 August 2015, ISO 9001 certified, with nine staff and a network of consultants located globally. In addition to team Charmelian, KT team members Lia Hayman, Charlie Horsnell, and Ethan Parry were at hand for data analysis and reporting.

2 Research Methodology

The research methodology for the project is illustrated in Figure 1 giving the three different steps in the process: initial data collection leading to the secondary data collection and resulting in analysis and reporting on the key findings relating to the implementation and success of the SSC Codes; as well as key learnings for future impact.
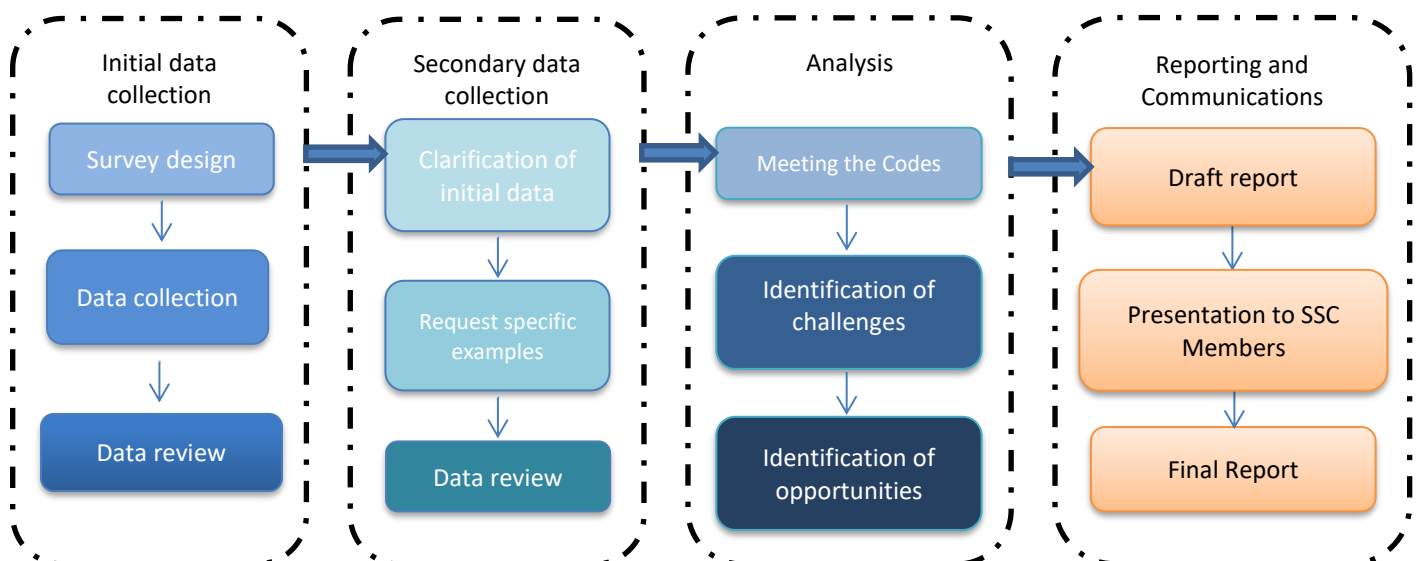

Figure 1: Research methodology

2.1   Initial data collection

In order to conduct the initial data collection, The 27 commercially active Members of the SSC were asked to answer eight questions (as shown in Appendix B) survey questions were based around the SSC Codes of Conduct and were designed to investigate how Members implemented the Codes, their approach, and invited general comments on using the Codes. Additionally, Members were asked to list all species to which the Codes were applied, from a recent annual period (in most cases this was 2019), in order that the Charmelian team could analyse how the Codes are used in specific product examples.

SSC Members were asked to describe their policies and approaches to implementing the SSC Codes. It was intentional for the exercise not to collect commercially sensitive information or protected intellectual property. The answers of members to the survey were not verified since it was not an audit. Wherever possible publicly available information was used.

2.2   Secondary data collection

Upon receiving the responses, a spreadsheet was drawn up to review the data collection. This spreadsheet acted as a checklist to assess how the responses aligned to elements of the SSC Codes relating to both sourcing and labelling.

The responses for each Member were then evaluated against the SSC Codes and were categorised depending on whether the policies, procedures and materials carried out met the Codes. Evidence was also included to support whether the Member was implementing the Codes or not. Misalignment or aspects related to the SSC objectives were noted and followed up with the member for fact checks. Once the spreadsheet was fully populated, the second round of questions were drawn up based on what was unclear in the first round.

For the second round of questions, Members were asked questions that clarified any ambiguities in the first round. The project team also requested Members provide information about five species to learn how the members utilise the SSC Codes for specific species. Members were asked to provide information relating to:

- The risk assessment which is carried out to determine the species risk category
- Actions taken where needed as determined by the risk assessment
- Documented engagement plan with at risk fisheries / farms in place and monitored
- Traceability assurance
- Certification details
- The final product showing labelling
- Any other communication produced about the product e.g. online marketing

Lastly, one-to-one interviews were held with SSC Members, as required, in order to follow up questions and to discuss opportunities and challenges with implementing the Codes.

2.3   Analysis and reporting

As mentioned above a data collection spreadsheet was used as a checklist to review and analyse the data received from the Members. Once the second round of data had been received, the team

reviewed each data file to check any artwork for labelling claims and reviewed the risk assessments and traceability in accordance with the SSC Codes. This input was used in addition to the original data collection spreadsheet to measure the following indicators for each SSC Member:

Sourcing policy available

Sourcing policy publicly available

Risk assessment meets the Codes

Improvement plans exist for fisheries and farms

Sustainability claims meet the Codes

Responsibility claims meet the Codes

Percentage of products in scope

In this report, a matrix has been created for each SSC Member who participated in the study along with further details on how the Member has been meeting the Codes is provided below each matrix. The reviews build on the 2017 checklists (see Appendix C) aiming to be an analysis rather than an audit. The reviews should help identify approaches, challenges, and opportunities for further development of the SSC to better meet the intent and objectives.

The Member matrixes were completed using the checklist which contains all the Member data against checklist style questions taken from the SSC Codes. For example, if a Member's sourcing policy was in line with the Code, then a tick is provided in the Matrix.

Alternatively, if there lacked information or that it seemed they were not fully in line with the Codes then a cross was included in the relevant box.

In the case that the Member did not make a claim or sourced farmed product for instance then it was denoted 'N/A' – Not Applicable. Where the finding is N/A for the Labelling Code, this does not imply any failings but rather that environmental claims are not made.

The same method was applied to each indicator once relevant information was checked. To assess whether sustainability and responsibility claims meet the Codes the team evaluated the artwork sent over by the Members against the Codes. The percentage of products in scope is based on the response given by the Members during the initial round of data collection.

The reporting has been conducted sensitively and the anonymity of SSC Members maintained. A code replaces the Member's name and findings have been written in a manner so as not to reveal the identity of the Member. Section 3.3 provides a summary of findings across Members drawing attention to general findings or themes where apparent.

3 Findings

The following section provides an overview of the results of the research for each SSC Member. The intention of the research was to review Members' implementation of the Codes, note different approaches, challenges or inconsistency such that it is possible to identify areas where the SSC could adapt or review the Codes for greater impact. Section 4 provides conclusions and recommendations for further considerations for the SSC.

3.1 Participation in the review

Overall participation was high with all 27 commercially active Members taking part. Most SSC Members were highly communicative in providing updates on their position and how long it would realistically take to provide the data requested.

However it was difficult to impose deadlines for the data collections rounds. Some Members informed the team that the time of data collection was a particularly busy period and an alternative time of year for these reviews might work better. In addition, due to the COVID-19 pandemic some staff who are responsible for the SSC membership and compliance were furloughed or on reduced working hours adding an additional burden. For future reviews it may be more practical to extend the project timeline to allow for responses, follow-ups and clarifications.

3.2 Member application of the Codes

Overall, the data provided by the Members was sufficient to demonstrate that the SSC Codes were being followed by the SSC Members. There were a few areas where gaps were identified between the information provided by a Member and the Codes, which could have been due to insufficient information in order to draw a conclusion or that the data provided indicated deviation from the Codes or another reason. It should be noted that the exercise was not an audit and the findings are not evidence of non-compliance by a Member. In addition, some aspects of the Codes were less relevant for some Members, such as the sourcing policy for the producer Members and as such only the applicable aspects of the Sourcing Code (e.g. environmental risk assessment of their own farm site operations, etc.) have been included.

The following section provides a matrix for each Member and explanatory text detailing the approach of each Member to meeting the Codes including information on their sourcing policy, risk assessment, improvement actions, traceability, labelling and claims and the scope of application.

Member A

Sourcing Code		Labelling Code	
Policy meets Code	*Available* ✓ *Public* ✗ **In Progress**	**Sustainability claims** meet Code	*On Pack* ✓ *Off Pack* ✓
Risk Assessment meets Code	✓	**Responsibility claims** meet Code	*On Pack* ✓ *Off Pack* ✓
Improvement plans exist	*Farms* ✓ *Fisheries* ✓	**In Scope** (% of own-brand products)	100%

Sourcing Policy and Transparency

Member A is a retailer whose website makes several claims about how they provide food that is both sustainable and responsibly sourced. Due to commercially sensitive information the entire sourcing policy is not publicly available but the intention is that it will be published once a public friendly version is ready. Nevertheless general information regarding the sourcing procedures which cover a greater scope than the SSC Codes is available via the company website. There is also transparency relating to sources of seafood showing performance indicators related to environmental sustainability and other criteria. This is validated by the company's own auditing scheme.

Risk assessment and improvement actions

This Member has their own meetings, tasked with updating sourcing policies by being informed of the latest developments in science, risk assessments are carried out regularly. A three tiered risk assessment developed jointly with a third party assists this Member in sourcing decisions and using NGO/other publicly available assessments. The results of the risk assessment will decide what fisheries and farms need to be monitored and where improvements need to be made. This appeared to meet the SSC Codes and also included additional criteria relating to ongoing sustainability initiatives and an ethical risk assessment. In the case of farms, this can potentially result in deselecting certain farming sites.

Aquaculture sourcing is assessed by management and the sustainability coordinator, this followed the risk assessment in line with the SSC Codes and their own policies on feed. As such if a feed ingredient is medium/high risk then an appropriate response is taken and engagement is followed. Engagement may take the form of an advocacy FIP or MarinTrust Improver Program or FMFO. However most fishmeal and fish oil products are already certified. It should be noted that Marin Trust is not certifying the fishery and the unit of certification is the factory.

For fisheries, if improvements need to be made then they will implement a documented engagement plan as demonstrated by the examples provided by the Member. The company has a policy that requires fishery improvements to be public, in a FIP as defined by the Conservation Alliance. The supplier is required to check the source is part of the FIP and traceability back to the source is required.

Traceability

Member A has systems of traceability that form part of their risk assessment and buying & technical approval process. Ensuring a robust system of traceability is also necessary as part of their policy requirements for both farmed and wild species.

Labelling and claims

This Member's approach is not to make a claim on every seafood product, even though they follow the SSC Sourcing Code. In general the Member only uses the claim 'responsibly sourced' except in a few unusual circumstances where their sustainability credentials are a differentiator for them in the seafood market. The decision to make a claim on any packaging is decided by several internal teams. Usually 'Responsibly Sourced' is used and the Member will use 'Sustainably Sourced' only when it gives market differentiation.

Scope

The scope of the SSC commitments applies to the same products as those covered by the Responsible Fish Sourcing policy, which applies to seafood products sold in the UK. This includes all own-brand, fish and shellfish; added value, frozen and ambient fish products; and fish used as ingredients such as sandwiches, ready meals, marine based ingredient sources of the fish feed etc. Although pet food is excluded from scope the Member is working on improvements to these sources of seafood. All communications including in stores, online, print, adverts etc. are included in the policy and examples provided showed the explanation of 'Responsibly Sourced' according to the SSC Code.

Member B

Sourcing Code		Labelling Code	
Policy meets Code	*Available* ✔️ *Public* ✖️ **In Progress**	**Sustainability claims** meet Code	*On Pack* ✔️ *Off Pack* ✔️
Risk Assessment meets Code	✔️	**Responsibility claims** meet Code	*On Pack* ✔️ *Off Pack* ✔️
Improvement plans exist	*Farms* ✔️ *Fisheries* ✔️	**In Scope** (% of own-brand products)	99.5%

SSC Member B follows the Codes of Conduct when sourcing any seafood and applies the Codes to labelling products. If a product does not meet the Code's requirement for 'responsibly sourced' as a minimum, they do not buy from that source.

Sourcing Policy and Transparency

The sourcing policy according to the SSC Codes is made public on the Member's website and relates to both fisheries and farmed seafood. The policy is in line with the Codes and is communicated to the public, compliance to the code is third party audited. The policy is being updated and the next version will also be made public. Member B holds regular meetings with category colleagues and suppliers where they discuss the status of sources and products. This progress is reported publicly in a range of formats, including the in Ocean Disclosure Project (ODP). The policy also includes human rights (plus ethical risk assessment) and involvement with other tools or initiatives around sustainable seafood.

Risk assessment process

The Member uses a slightly changed version of the SSC Risk Assessment Sheet that is sent to suppliers to complete. Once returned, the Member goes through the information and shares it with two NGO partners who in turn shares their recommendations on interpretation of the information in regards to the Codes. Approval is then made for the sources who meet the Codes requirements, with or without conditions. Some sources are rejected if they do not meet the Policy or the Codes.

Improvement actions

Where, according to the Codes, improvement actions are required to source from a high and/or medium risk species, the member demonstrates actions that are being taken to meet this requirement. For the examples provided by this Member all sources were either certified (MSC or ASC) or for the wild fisheries in a public FIP. The status of fisheries taking part in a FIP are tracked through Fishsource and the website fisheryprogress.org and periodically reviewed by the Member.

Traceability

The Member uses the Sustainable Fisheries Partnership (SFP) 'Metrics' system to monitor their seafood sources, species, catching methods, countries, suppliers, volumes, and sustainability status. Metrics is not a traceability system and so the member carries out traceability exercises with suppliers when needed tracing a product back to vessel level.

Labelling and claims

The Member provided evidence of labelling and claims for a variety of products. When the product is independently verified, such as through Marine Stewardship Council (MSC) certification, it holds the MSC logo. Products may show a 'responsibly sourced' claim, however the company may make the decision not to include the claim even though it meets the Codes.

Scope

The Member applies the policy to all seafood products where seafood is the main ingredient and estimate that 99.5% of proportion of seafood sales is within SSC scope. This includes Groceries, Frozen, Chilled, Prepared and nutritional supplements. Some products that contain seafood are out of scope, for example, Member B states pet food, fish stocks, soups, sauces are out of scope.

Member C

Sourcing Code			Labelling Code		
Policy meets Code	*Available* ✔		**Sustainability claims** meet Code	*On Pack* N/A*	
	Public ✔			*Off Pack* N/A*	
Risk Assessment meets Code	✔		**Responsibility claims** meet Code	*On Pack* ✔	
				Off Pack ✔	
Improvement plans exist	*Farms* ✔		**In Scope** (% of own-brand products)	100%*	
	*Fisheries** ✔				

* Do not use the claim 'sustainably sourced'
** Query on whether FAD-Free is considered as a fisheries improvement under the SSC Codes
*** Exclusions: pet food, products in which seafood makes up <1% of ingredients

Sourcing policy and Transparency

Member C has a seafood sourcing policy which applies to wild and farmed seafood where seafood makes up >1% of home brand, finished products. All suppliers are expected to comply with the SSC Codes. Full sourcing documents are provided internally, while a shortened version is publicly available. The website includes reference to the SSC Codes.

The seafood policy does not include social aspects but the Member does have an ambition to ensure that among their supplies there is low risk of non-compliance with ILO 188. As a company they have an Ethical Trading Policy and produce an annual modern slavery statement.

Risk assessment and improvement actions

This Member prioritises seafood that has been certified to GSSI benchmarked standard, or for wild-caught fish is rated as below Level 4 by the Marine Conservation Society (MCS) or part of a Fisheries Improvement Programme (reporting on FisheryProgress.org and with progress C or above). For aquaculture seafood, feed must also be certified to BAP, Global GAP (or ASC as it becomes available) and from the end of 2020 all fish meal and fish oils will have to be IFFO RS certified (or demonstrate compliance with the Member's wild-caught requirement) and fully traceable.

However, there are some allowable exceptions or derogations (although suppliers have to commit to fulfil requirements under a certain time period, and this Member suggests it takes a less binary approach to the application of the SSC than the typical model of MSC certification and/or FIP. They explain "*We believe that encouraging consumption of a broader range of locally sourced species is vital to sustainability of global fish stocks, reducing pressure on major commercial species and helping to support thriving coastal communities and ecosystems*"… "*We utilise Marine Conservation Society (MCS) assessments to help inform our approach to sourcing from these [alternatives], have engaged parts of them with formal assessment/improvement work, have engaged other parts in less formal improvement but take a very conservative approach to labelling any claims on products which fall outside of FIP/Certified status.*"

This interpretation and approach meets the Codes. Moreover, the member holds progress reports for all fisheries included in a FIP.

Traceability

There is a requirement for all seafood to be traceable back to vessel, although this is more challenging in some fisheries which requires specific checks of batches and lot codes.

This Member is part of the Ocean Disclosure Project (ODP) and thus each year a review of all supplied fish/seafood in the business is undertaken. Further, as a condition of supply, all suppliers using fish/seafood raw material must each month report details of all fish/seafood they have supplied into the Member in an online metrics system. Once a year this information is cross-referenced with internal documents to ensure the two correlate, resulting in an accurate ODP disclosure.

The Member also supports the GDST process.

Labelling and claims

Member C provided evidence to support various of their labelling and claims processes, which resulted as an outcome of the risk assessment process. If the criteria are fulfilled for wild-caught sources, the term 'Responsibly Sourced' is used; and for aquaculture species 'Responsibly farmed'. The Member does not appear to use the term 'sustainable'.

One example of a product labelled 'responsibly sourced' was provided, however other products did not include the responsible claim and in this way also met the Codes. An example of another claim appearing on their labelling is 'traditionally caught'. Where MSC products are sourced, a fishery certificate was provided as evidence.

The Member explained that FAD-Free is not considered equivalent to a FIP and relates purely to the method of catch. This does not account for the breadth of factors required for responsible fishery management. The point on FAD-Free within the Members' policy is made in part to incorporate the fact that they would not permit FAD caught purse seine tuna for use, even if it were to meet the fishery standards defined for wild capture (MSC).

The Member has a specification and labelling compliance team that check that any claims are in line with approved assessments against the Member's sourcing policy.

Scope

All own-brand seafood is considered within scope apart from those that make up <1%, for example an anchovy extract in a sachet dressing which is included in pre-packed ready to eat salad. Whereas fish in a sushi roll that makes up 10% of the product would be considered in scope.

Member D

Sourcing Code		Labelling Code	
Policy meets Code	*Available* ✓	**Sustainability claims** meet Code	*On Pack* N/A*
	Public ✓		*Off Pack* N/A*
Risk Assessment meets Code	✓	**Responsibility claims** meet Code	*On Pack* ✓
			Off Pack ✓
Improvement plans exist	*Farms* ✓	**In Scope** (% of own-brand products)	100%**
	Fisheries ✓		

*Do not use the claim 'sustainably sourced'
** Exclusions include: pet food, flavourings

Sourcing Policy and Transparency

SSC Member D retails farmed and wild caught seafood in the UK. Their sourcing policy and sustainability commitments are available publicly on their website including a communication about the SSC. The sourcing policy also includes commitments on social and ethical standards at sea and avoiding IUU fish.

Risk assessment

A risk assessment based on the SSC Codes is applied to all sourcing. This includes an annual assessment against sustainability criteria which is also shared with a third party. The policy does not specify what criteria are used to assess stock status or management practices, but says that all seafood meets the 'Responsibly sourced' claim as outlined within the SSC Codes.

Improvement action

During the annual review period a total of 20 engagement actions were taken to improve the environmental performance of fishery and aquaculture sources.

Traceability

Traceability is third-party audited from product back to the farm for aquaculture products; and to the vessel or group of vessels for wild-caught seafood. The information is cross checked using a number of tools including random checks to supply trace information in a time-period; unannounced audits by a 3rd party; and testing to verify labelling claims using DNA testing.

Labelling and claims

Products were previously labelled as 'sustainably sourced' if carrying the MSC logo or 'responsibly sourced' according to the SSC Codes. Going forward the Member is planning only to use the 'responsibly sourced' claim and remove standard logos.

The retailer has procedures for approving labelling and amending labelling when it is found not to meet the SSC Codes. There are labelling guidelines that include the SSC criteria and involve sign-off by the Product Technician, Supplier and Fish and Aquaculture Manager. The manager is also involved in sign off of any in-store décor or website contents that may include any claims. For farmed seafood it seems from the examples provided that Global GAP certification is accepted as evidence of responsible sourcing.

The company website sets out commitments and partnerships in line with the SSC Codes. It also encourages others (including their suppliers) to join SSC and apply the Codes. The most recent seafood sourcing transparency publication available was from 2017.

Scope

Scope of SSC application covered seafood sold in the UK and did not include stock, flavourings or pet food, which do not carry any environmental claims.

Member E

Sourcing Code		Labelling Code	
Policy meets Code	*Available* ✓	**Sustainability claims** meet Code	*On Pack* N/A*
	Public ✓		*Off Pack* N/A*
Risk Assessment meets Code	✓	**Responsibility claims** meet Code	*On Pack* ✓
			Off Pack ✓
Improvement plans exist	*Farms* ✓	**In Scope** (% of own-brand products)	100%**
	Fisheries ✓		

* Do not use the claim 'sustainably sourced'

**Includes pet food and ingredients, not including sauces or stocks used in production of seafood products.

Sourcing Policy and Transparency

Member E has a code of practice for the sourcing of fish and shellfish, which outlines minimum requirements for own-brand fish products. The code of practice is publicly available on the Member's website. In accordance with the Codes, Member E also has social and ethical sourcing within their policy, requiring the supplier to demonstrate that the fish supplied is in line with their social policy.

Risk assessment

To meet the SSC Codes, all fish species are put through a risk assessment with evidence provided for each question with all sources needing to be approved by the appointed seafood manager. The risk assessment template is freely available for public information plus there are internal records maintained of decisions for confidential checks.

Improvement actions

The Member is currently sourcing from fisheries that are in improvement. Upon request from the Member the supplier of these products can provide evidence to demonstrate that the fishery is engaged in a FIP or in a dialogue to move to a FIP. The Member's approach to improvements is that there's not a one size fits all, they tailor their approach to improvement depending on how much

influence they have and depending on this they can either go direct to the supplier to work on improvements or demand a public FIP. They aim to identify the best way to engage effectively. However, eventually they would expect a source to either move towards a public FIP or go straight into MSC full-assessment.

The member provided details on risk assessments, subsequent improvement actions, traceability and labelling for the lines requested. For two sources the Member determined that effective improvements were not possible or certified supply available and so did not source. With regard to aquaculture sources, everything the Member is selling is certified either to BAP, Global G.A.P. or ASC and they get visibility on feed sources. This means using a decision tree which is similar to that for human consumption and will look to engage in improvements where risks are found. The Member mentioned that the situation on feed is not ideal and that the publication of the ASC feed standard next year might provide a solution.

Traceability

Traceability systems are paper-based with information held primarily by (as the Member states) 'Tier 1 suppliers'; meaning that they are already authorised under the Aquatic Animal Health Regulations. Traceability exercises are conducted as part of routine supplier audit processes. The Member has been participating in the development of the [Global Dialogue on Seafood Traceability](#) (GDST) and intends to move toward implementation of digital traceability systems.

Labelling and claims

From information available on their website, the responsibly sourced claim has been made for products, which is suitable as they source in accordance with the SSC Codes of Conduct on Environmentally Responsible Fish and Seafood Sourcing. Where they sell products that are certified to MSC, the MSC logo seems to be on pack. The claim "sustainably sourced" does not seem to be used even if the fishery is certified sustainable according to the MSC Standard. And due to developments the 'Responsibly sourced' claim could be reviewed as sustainability landscape has evolved.

The Member's website is slightly confusing in referencing non-certified wild fisheries and farmed products as sustainable. Perhaps more of a technical issue with the website rather than the Codes not being followed but could be followed up with the relevant department responsible.

Labelling on pack is 'responsibly sourced' plus a certification logo where deemed appropriate. However, it was noted that some on-product labelling contained up to four different environmental claims e.g. Dolphin-safe, 'minimise environmental impact' and 'FAD-free'. It was not clear exactly how this fitted into the SSC Codes around labelling and improvements and could be confusing to the consumer. This labelling is due to multiple commitments and policies combining together and no one solution solving them all.

Scope

During data requests the Member stated 100% of their seafood products is within scope, i.e. the Codes are being applied to all their seafood products, however their range includes pet food and it was not clear this was covered.

Member F

Sourcing Code		Labelling Code	
Policy meets Code	*Available* ✓ *Public* ✓	**Sustainability claims** meet Code	*On Pack* ✓ *Off Pack* ✓
Risk Assessment meets Code	✓	**Responsibility claims** meet Code	*On Pack* ✓ *Off Pack* ✓
Improvement plans exist	*Farms* ✓ *Fisheries* ✓	**In Scope** (% of own-brand products)	100%* Also all branded tuna

*Exclusions include: fish gelatine, fish stocks used as ingredients in own-brand products, pet food and pharmaceuticals.

Sourcing policy and Transparency

Member F has a seafood sourcing policy that all suppliers of seafood products or products where seafood is an ingredient must adhere to. The policy is reviewed on an annual basis and signed off by an internal stakeholder group. On the Member's website there is no link explicitly to the policy, however there is extensive information regarding the policy on multiple webpages, providing examples and going in depth to the sourcing of different seafood products and species.

The policy mentions the SSC Codes and sets out criteria for wild-caught and farmed seafood in line with the Codes. It also includes specific policies for tuna (skipjack must be pole and line or handline MSC certified or within a credible FIP); and some lines of farmed salmon (RSPCA assured).

Risk assessment and improvement actions

All source fisheries and aquaculture go through a risk assessment process - low risk sources are signed off as they are processed. High or medium risk sources are taken through a monthly fish forum, and action plans need to be in place to evidence how risks will be mitigated e.g. FIP, engagement in advocacy groups. Low risk sources are reviewed annually through risk assessments, high and medium risk sources every six months.

The Member regularly engages with suppliers on areas of improvements and opportunities to drive positive change. The Member reported that, "*We regularly engage with suppliers on areas of improvements and opportunities to drive positive change.*" It is unclear whether a product/species has not been sourced due to not meeting the SSC requirements.

Traceability

The Member undertakes random tracebacks. They are adopters of the GDST and are currently using tools to benchmark themselves and implement any further traceability systems. They are also part of the Ocean Disclosures Project (ODP).

Labelling and claims

For products carrying third-party accreditation, the Member process is to ensure the relevant body have been sent a copy of the artwork to approve. This is generally managed by their suppliers but the Member also takes responsibility for this. Once artwork is present for review, contact to the supplier is made to confirm whether or not they have sent the artwork to the relevant body. If a product is MSC certified, the logo must be used on pack. There were examples provided where the MSC logo has been used and only the responsibly sourced claim used (although it would have been justifiable to use the sustainable claim).

Scope

All Member F own-brand fish and seafood, fish and seafood used as an ingredient in own-brand products, branded tuna, and feed used in aquaculture operations that supply into own-brand products (*excludes fish gelatine, fish stocks and bouillons used as ingredients within own brand products, pet food, pharmaceuticals).

Member G

Sourcing Code			Labelling Code		
Policy meets Code	*Available* ✓		**Sustainability claims** meet Code	*On Pack* ✓	
	Public ✓			*Off Pack* ✓	
Risk Assessment meets Code	✓		**Responsibility claims** meet Code	*On Pack* ✓	
				Off Pack ✓	
Improvement plans exist	*Farms* ✓		**In Scope** (% of own-brand products)	100%*	
	Fisheries ✓				

* Fish extracts (e.g. anchovy extract), fish sauces, non-food products

Sourcing Policy and Transparency

SSC Member G policy is a supplier of own-brand, food service products, business to business and retail own-brand products. As a company, they have a seafood sourcing policy relating to farmed and wild capture fisheries, encompassing inter alia, environmental and social aspects, while also addressing the SSC Codes.

The Member has an outward facing public seafood policy applicable to both farmed and wild sourcing, while also having an internal seafood sourcing policy. They prioritise seafood certified to a GSSI benchmarked standard or from a credible FIP. The internal sourcing policy elaborates and includes annexes for greater clarity on sourcing practices, such as material initial assessments, social compliance for fishing vessels, aquafeed declarations for both aquaculture and wild capture.

Member G also has a commitment to the ETI base code and requires suppliers to complete self-assessments loaded onto SEDEX (a membership based online portal).

Risk assessment and improvement actions

The Member addresses the SSC Codes and sources from certified, medium risk and low risk fisheries and aquaculture sources; no high-risk sources are present. They also undertake regular and ongoing monitoring of sources.

There were no instances identified where sourcing was restricted due to SSC Codes, however several engagement/corrective action plans have taken place, and the member is currently engaging with 13 fisheries on improvements.

Traceability

All raw material is traceable back to farm, vessel or a known fleet of vessel, through paper-based systems and invoices. The Member is currently implementing a GDST compliant digital traceability system.

Labelling and claims

The Member provided multiple examples of products where either responsibly sourced claims are made on packaging; or when from a certified source (MSC, ASC, GlobalG.A.P) the certifiers logo is present. All of these claims are within the SSC Codes. They have a sign off process for artwork which includes checks on the sourcing of raw materials and public-facing claims.

Scope

*100% frozen, fresh or ambient fish and shellfish raw materials. Fish extracts (e.g. anchovy extract), fish sauces as well as non-food products are not currently included within the scope of the Members policy.

Member H

Sourcing Code		Labelling Code	
Policy meets Code	*Available* ✔	**Sustainability claims** meet Code	*On Pack* ✔
	Public ✔		*Off Pack* ✔
Risk Assessment meets Code	✔	**Responsibility claims** meet Code	*On Pack* ✔
			Off Pack ✔
Improvement plans exist	*Farms* ✔	**In Scope** (% of own-brand products)	100%*
	Fisheries ✔		

* The parent company is outside of SSC membership

Sourcing Policy and Transparency

Member H is a seafood supplier to retailers, they have a publicly available sustainability report located on Member H's parent company website, and are part of the Oceans Disclosure Project. Additionally, they support the Responsible Fishing Scheme for wild-caught fish and a modern slavery act statement can be accessed through Member H's website.

On their own-brand product website, they specifically mention the SSC and include links to download the Codes.

Risk assessment and improvement actions

All of the Member's seafood is sourced within the Codes, however there are other sections of the parent company where they are not assessing the Codes for seafood purchases. In this situation, Member H carefully monitors the status of the fishery or aquaculture farm in the expectation of making improvements via FIPs. When monitoring for improvements of supply sites, instead of rating fisheries and farms as high, medium or low risk; this Member has their own rating system: Base, Good Practice, Best Practice or Aspirational. Member H uses a risk assessment that is approved by a third-party and reviewed annually. If the results of the risk assessment are not favourable, then this information is reviewed by a technical manager who makes the decision to source or not. Two examples were given where seafood was not sourced due to outcomes of the risk assessment. In both examples the Member had supported a FIP process but chose not to source in the first instance due to ongoing traceability, IUU and ethical concerns and in the second instance due to lack of an improvement plan.

Traceability

When choosing suppliers, traceability is a component of Member H's standard. This majority of supplies have an externally certified chain of custody back to sites. This is supplemented by regular audits and DNA species tests.

Labelling and claims

Member H works alongside retailers when deciding whether to label products as sustainable or responsible. Before making any such claims, Member H ensures a risk assessment is completed, and will provide label declarations to customers. For own-brand products, labels are checked by the management committee. On examples found online, own-brand packaging does not appear to make any sustainabilty or responsibility claims.

Scope

100% of seafood for this Member is within the scope of the SSC Codes, but the parent company is outside of SSC Membership.

Member I

Sourcing Code		Labelling Code	
Policy meets Code	*Available* ✓ *Public* ✓	**Sustainability claims** meet Code	*On Pack* ✓ *Off Pack* N/A
Risk Assessment meets Code	✓	**Responsibility claims** meet Code	*On Pack* ✓ *Off Pack* ✓
Improvement plans exist	*Farms* ✓ *Fisheries* ✓	**In Scope** (% of own-brand products)	100%

Sourcing Policy and Transparency

SSC Member I has a sourcing policy whereby they do not buy any seafood that is not 3rd party certified or part of an active FIP. Farmed seafood needs to be 3rd party certified (or part of a FIP) at the Factory, farm, hatchery and feed mill level; and they also ensure that any marine ingredient used in fisheries is from a certified source (or a FIP) and use by-products where possible. The Member's recognised certification bodies are BAP, Global G.A.P., ASC Organic and MSC. They require FIPs to be working towards and using the latest MSC standards.

Further to this, the sourcing policy has well-defined social elements which include all suppliers registering in an internal system and completing a self-assessment questionnaire, along with an audit to verify the self-assessment. They support the Ethical Trading Initiative Base code and are a member of SEDEX and use the related ethical risk assessment tools.

Risk assessment and improvement actions

The risk assessments are comprehensive and are conducted on an annual basis to ensure that all information is kept as up to date as possible.

For aquaculture sources, the member collects information via questionnaires and also undertakes regular site visits. For wild-caught sources, the Member looks at the fishery assurance and certification on the prospective source. The Fishery should be either independently certified as responsible (MSC or equivalent) or in a comprehensive Fishery Improvement Project (FIP). Checks are made on the audits

and any remaining conditions. The Member also undertakes an IUU risk assessment and will decline anything that comes out as high-risk for IUU or if will impose conditions if there is a medium risk.

Suppliers are also required to link with the Member and give them full visibility of their site so that they can fully review their self-assessment questionnaire, and the member can then indirectly link their suppliers to their customers so that everyone has full visibility. If there are any non-conformities (NC) raised during the audit then the Member works closely with suppliers to ensure that they are closed off in the recommended time.

Traceability

The Member has pre-shipment reports that are built using the Global Dialogue on Seafood Traceability Guidelines that detail the full supply chain before the product is shipped for pre-approval. In addition there are annual audits, and full mass-balance calculations included in the traceability exercise and undertaken for all products.

Labelling and claims

Regarding labelling practice, they adhere to the certification guidelines. As the Member mainly supplies from 3rd party certified farms all their product is responsibly sourced and this is what is put on packaging. ASC has a specific criterion relating to how it is labelled and the Member uses the ASC on pack. All their cold-water prawns are labelled MSC. Internally they have an artwork approval system, or where an external certification body is involved they send the artwork for approval. The sustainably sourced claim does not seem to be used off pack.

Scope

All of the Member's seafood is included in the scope. They only buy third party certified seafood or fisheries participating in a FIP.

Member J

Sourcing Code		Labelling Code	
Policy meets Code	*Available* ✔️	**Sustainability claims** meet Code	*On Pack* ✔️
	Public ✖️ **In progress**		*Off Pack* N/A
Risk Assessment meets Code	✔️	**Responsibility claims** meet Code	*On Pack* ✔️
			Off Pack ✔️
Improvement plans exist	*Farms* ✔️ *Fisheries* ✔️	**In Scope** (% of own-brand products)	100%*

*Excludes minor components e.g. crisp flavourings

Sourcing Policy and Transparency

Member J is a wholesaler of various food products to customers in various sectors. This Member has a fully audited sustainability report, updated annually, as well as a modern slavery statement available to the public on their website. The SSC Codes are detailed within the sustainability report. In addition to these, they are planning on uploading their responsible seafood sourcing policy to the website soon.

Risk assessment and improvement actions

The Member has policies and procedures in place to follow the Codes for all own-brand products, however they also supply some other branded products that lie outside of the SSC scope. Any purchasing decisions, for both farmed and aquaculture, are undertaken after a risk assessment has been conducted.

For wild caught seafood, the Member uses the Marine Conservation Society risk ratings to inform their risk assessment. Anything with a MCS rating of 1-3 is considered low risk and will be sourced from; 4 -5* is considered medium risk, and 5 is considered high risk. Sourcing of medium or high risk products can take place subject to being in a credible Fishery Improvement Project (FIP) or other documented and monitored engagement / improvement plan. Any seafood certified to the Marine Stewardship Council (MSC) standard is also considered low risk.

For farmed fish, any fish certified to a GSSI benchmarked standard is considered low risk and also needs to hold a full chain of custody. They also require all their own-brand suppliers to work towards ensuring all marine ingredients in fish feed is Marin Trust (previously IFFO RS) accredited.

Traceability

In order to ensure full traceability, Member J requires all their own brand suppliers to be British Retail Consortium (BRC) (or equivalent) certified which includes traceability as part of its scope. Additionally, this Member audits their suppliers where a traceability exercise is conducted.

Labelling and claims

Internally, any labelling or marketing material is signed off by a trained technologist familiar with the SSC Codes. The sustainably sourced claim does not seem to be used off pack.

Scope

Member J reported that all their own brand is within scope, with the exception of where it forms a minor part of the overall product e.g. flavouring of crisps.

Member K

Sourcing Code			Labelling Code		
Policy meets Code	*Available* ✔		**Sustainability claims** meet Code	*On Pack* ✔	
	Public ✘			*Off Pack* ✔	
Risk Assessment meets Code	✘		**Responsibility claims** meet Code	*Off Pack* ✔	
				On Pack ✔	
Improvement plans exist	*Farms* N/A		**In Scope** (% of products)	100%	
	Fisheries ✔				

SSC Member K is a supplier of farmed and wild seafood products.

Sourcing policy and Transparency

The Member has policies and procedures in place that meet the code, through targeting sources that are third-party certified. These sourcing policies, however, are not communicated in their entirety for the public. Instead, the Member presents general information on their website through case study

articles and their product pages. The Member reviews their sourcing policy every 2 years as a maximum, but they carry out reviews more frequently.

For the Member to meet the Code's social and ethical requirements, they ensure that all supplies are registered on SEDEX or BSCI. The member is committed to following the principles of the ETI base code and has several policies in place to mitigate the risk of social issues.

Risk Assessment

When sourcing from a location which is not third-party certified, the Member refers to their risk assessment for these products and ensure relevant improvement actions are in progress, this ultimately determines their decision to source or not. For non-certified fisheries the Member takes references against RASS and MCS profiles to understand risk.

For one farmed source example provided Global GAP certification seemed to be acceptable as not requiring a risk assessment. However it is not clear how the marine ingredient components of the feed going in to this source were assessed and improved according to the Codes. No improvements were required for farmed sources since they were all certified.

Improvement actions

The Member has followed the code for improvement actions where those have been deemed necessary by the risk assessment. The risk assessment also includes an assessment of whether the actions in place are working or not. The examples provided showed that the Member was sourcing from FIPs according to the risk assessment.

Traceability

The Member also claims to source only from fisheries with full traceability back to the original fishery using batch codes through the supplier. Details of the source fishery and fishing vessels were provided for the examples chosen for review.

Labelling and claims

If they source from a location that is not third-party certified, they do not make any sort of labelling claims regarding the source's sustainability or responsibility. In addition, the Member has a new product development flow system which has built into it any requests for sustainability claims that the customer wants to make.

On their website there are many claims regarding their sustainable and ethical sourcing. When making claims on labelling, the technical team check for compliance and the marketing team check all social media claims. The Member is accountable for the labelling of its own-branded products but also accept responsibility for informing own-label customers of what they can claim on the pack.

Scope

The company estimates that 100% of seafood products are in scope with the Codes.

Member L

Sourcing Code		Labelling Code	
Policy meets Code	*Available* ✓	**Sustainability claims** meet Code	*On Pack* ✓
	Public ✗		*Off Pack* ✓
Risk Assessment meets Code	✓	**Responsibility claims** meet Code	*Off Pack* ✓
			On Pack ✓
Improvement plans exist	*Farms* ✓	**In Scope** (% of products)	100%
	Fisheries ✓		

Sourcing Policy and Transparency

SSC Member L is a supplier of farmed and wild seafood products to retail and food service, that closely follows the SSC Codes. Their sourcing policies appear to meet the SSC Codes and all key functions within the organisation are aware of the SSC Codes and the commitment to their adherence. The Member's website has some information on seafood sourcing, but no public policy which explains how they meet the SSC Codes. There is also a commitment to ethical trading and a Modern Slavery Act Statement.

Risk assessment and improvement actions

All fish sourced according to the SSC Codes is medium or low risk, either in an improvement project or certified. For example, a wild-caught supply has entered a FIP and is listed on the fisherprogress.org website. Suppliers are required to demonstrate progress in addressing areas requiring improvement, as identified through risk assessments. All farmed sources are ASC certified and either Global GAP or BAP 4 star; certification to either one is used as evidence of responsible sourcing.

The Member has policies and procedures in place that meet the Codes for all own-brand products. They are applicable to both farmed and wild supply in line with sourcing commitments and SSC Sourcing and Labelling Codes. This is driven by risk assessments according to the SSC Codes. For products packed for other brands the Member advises them on meeting the code. These sourcing policies are not published but a summary of sourcing policies and credentials is available on their website.

Traceability

Traceability is third-party audited as well as audited by customers and the by company. The information is cross checked for specific claims and particular catch areas and vessel lists, also referencing an internally approved supplier list, catch records/other documents provided through the supply chain.

Labelling and claims

Detailed descriptions were provided for the selected product examples on how they met the SSC Codes. 'Responsibly sourced' was used on farmed products meeting the Codes.

Products carry a 'responsibly sourced' claim as well as MSC approved language when the MSC logo is used on product for wild-caught seafood ('well managed and sustainable fishery'). Other fishery certification logos are also able to be used on-product .

Off-product, other environmental claims are made such as promoting environmentally friendly practices. On their website there are claims regarding their policy of responsible sourcing and promoting sustainable fishing methods.

Scope

All own-brand products are sourced and labelled according to the SSC Codes (this is estimated at about 10% of overall value). Sourcing for products with other labelling is according to the customer's policy since they are responsible for the claims made on packaging. Many of the customers are also SSC Members and so this would be aligned with the Codes. Where they are not the company encourages other companies to join the SSC.

Member M

Sourcing Code		Labelling Code	
Policy meets Code	*Available* ✓ *Public* ✓	**Sustainability claims** meet Code	*On Pack* N/A *Off Pack* ✗
Risk Assessment meets Code	✓	**Responsibility claims** meet Code	*On Pack* N/A *Off Pack* ✓
Improvement plans exist	*Farms* N/A *Fisheries* ✓	**In Scope** (% of own-brand products)	100%

Sourcing policy and Transparency

Member M supplies fish nationwide to a variety of businesses and commits on their website to abide by the key principles set out in the SSC Codes. The Member does give a detailed description of how they

ensure sustainability through the 'Sourcing' section on their website. On this webpage, one can see how the Member has policies and procedures relating to traceability, third party certification and sourcing decisions. In addition, the Member has a public facing sustainability policy that outlines how the Member utilises different benchmarking and certification in their practises.

Risk Assessment

This Member uses MCS and RASS risk ratings to decide whether to source certain lines of seafood or not. Preference is given to sources that have an MCS rating of 1-3 and are certified to a GSSI standard. If a species is listed as vulnerable on the IUCN Red List or has an MCS rating of 5, they will still be sourced when no alternatives are available, however the product must be approved by the Seafood Sustainability Director. All good fish ratings are reviewed twice annually, therefore meaning all sourcing decisions are also reviewed as much.

Improvement actions

Seafood with a high risk will still be sourced if coming from a credible FIP that is listed on FisheryProgress.org. Also, the company may be involved in conservation projects, which can inform the Sustainability Director to downgrade the risk involved with sourcing a particular range. There were no examples of farm improvement engagement just sourcing from certified farms.

Traceability

This Member will only sell wild seafood if it is traceable back to the vessel. Additionally, farmed seafood is ASC certified, meaning that all seafood from these sources are traceable to farms that have been independently certified to the ASC standard via Chain of Custody certification.

Labelling and claims

On product there are certification logos such as the ASC and off product the Member claims 'Responsibly Sourced'. But there did not appear to be any on-product environmental claims related to the Code. There is however, off product reference to 'sustainable' farmed products, which is not strictly following the Codes. And also 'sustainably sourced' is used relating to seafood but it is not clear exactly what scope of sourcing this is applied to.

Scope

Member M has stated that all seafood products purchased by Central Purchasing or by individual sites is within scope.

Member N

Sourcing Code		Labelling Code	
Policy meets Code	*Available* ✓ *Public* ✓	**Sustainability claims** meet Code	*On Pack* N/A* *Off Pack* ✗
Risk Assessment meets Code	N/A	**Responsibility claims** meet Code	*On Pack* N/A* *Off Pack* N/A
Improvement plans exist	*Farms* N/A *Fisheries* N/A	**In Scope** (% of own-brand products)	100%

No responsibility or sustainability claims made on or off pack

Sourcing Policy and Transparency

Member N is a primary producer and as such some aspects of the Sourcing Code may not be applied in the same way as with the buying organisations. Expectations around traceability and souring policies are less relevant to this Member. Member N is a producer and supplier of a single species and grows, packages, and dispatches their product from sources that are Soil Association and Best Aquaculture Practices (BAP) certified. Or in some instances they will occasionally source from other farms which are BAP certified.

Risk assessment and improvement actions

They rely on third-party bodies to guide them on aligning themselves with the SSC Codes. Since the sources are BAP certified there are no improvement actions specifically against that standard. However, the Member does engage on improvements that they consider important to the sustainability of supply such as recycling and carbon footprint. The organisation does not technically do a risk assessment as they consider they are not sourcing product as a producer.

Traceability

This Member is in a unique position, as they grow, pack and distribute all of their own product. This means that they have full traceability. In cases where they have sourced from another farm, they collect from them directly.

Labelling and claims

All their product labelling is in line with BAP and Soil Association guidelines but there is no 'responsibly sourced' or 'sustainably sourced' claim on the product. Off-product however the product is labelled as sustainable, which is not in line with the SSC Labelling Code. The Member has an understanding of sustainability which differs from the Codes but is based on scientific advice and low impact production methods.

Scope

All product is within the scope of the SSC Codes.

Member O

Sourcing Code			Labelling Code		
Policy meets Code	*Available* ✓		**Sustainability claims** meet Code	*On Pack* N/A	
	Public ✓			*Off Pack* ✗	
Risk Assessment meets Code	✓		**Responsibility claims** meet Code	*On Pack* N/A	
				Off Pack N/A	
Improvement plans exist	*Farms* N/A		**In Scope** (% of own-brand products)	100%	
	Fisheries N/A				

Sourcing Policy and Transparency

SSC Member O is a direct to consumer business and state they source all their fish in line with SSC Codes. The Member does not have a public sourcing policy that relates to how the Member meets the SSC Codes that could be found during this assessment. As mentioned below, the Member sources from only one fish supplier who has their own sourcing policy, and they work closely together to make sure the SSC Codes are met.

Risk assessment and improvement actions

They use a fish supplier who in turn conduct annual MCS category rating checks to review all products/species sourced. Lines will be removed if they are found to be level 5. Further, the member looks at reducing the amount of level 4 fish in the business where possible. There is no public, explicit sourcing policy available, however on their website they have a page dedicated to suppliers.

The Member has had multiple instances where sources have been removed from their purchase list due to it not meeting either A) MSC certification, or B) where an MSC certification is not available and it is rated level 4 or 5 under MCS scoring. In certain circumstances, the member has tried to source MSC but there has been too low a volume available to do so.

Traceability

Traceability relating to seafood sourcing is conducted by the Members supplier on their behalf. No further information was provided on this, however the seafood supplier is an established business and has comprehensive sourcing policies (as indicated above) which include traceability procedures.

Labelling and claims

On the supplier page for the Member, it has indicated that they only buy fish from fishmongers accredited by the MSC, however this does not mean all the sources used are MSC certified (see risk assessment above). In the second round of data collection, the Member also provided evidence for products that are no longer sourced because they no longer meet the SSC Codes. There does not appear to be any on-pack environmental claims being made.

Scope

100% of products are in scope.

Member P

Sourcing Code			Labelling Code		
Policy meets Code	*Available* ✓		**Sustainability claims** meet Code	*On Pack* N/A*	
	Public ✗			*Off Pack* N/A*	
Risk Assessment meets Code	✗		**Responsibility claims** meet Code	*On Pack* N/A*	
				Off Pack N/A*	
Improvement plans exist	*Farms* ✓		**In Scope** (% of own-brand products)	100%	
	Fisheries ✓				

*Does not make any on or off product sustainability or responsibility claims

Sourcing Policy and Transparency

SSC Member P meets the SSC Codes and has a sustainability statement on their website, however no public policy could be found, although there is an internal sustainable seafood policy. This internal policy sets out the members criteria for both wild-harvest and aquaculture sourced products. Along with this, the policy incorporates and IUU and modern slavery criteria.

Risk assessment and improvement actions

Currently the Member uses the Good Fish guide for risk assessments, however they state they are currently in transition to using solely the SSC Codes for the assessments in the future. Furthermore, currently the Member has no fish listed as MCS Level 5 (Fish To Avoid) and is only sourcing Fish listed as Level 4 where there is no other "viable" alternative and/or where suppliers can demonstrate FIP, or other initiatives in place to move the fishery from MCS Level 4 to MCS Level 3 thus minimising the impacts of concern).

If the fishery or farm is found to be medium risk then improvements are put in place. If high risk and improvements are not possible or the source falls out of a FIP then it will not be sourced. The Member uses farm certifications such as Global G.A.P. to meet the low risk criteria as defined in the SSC Sourcing Code. However, the assessment does not seem to include the marine ingredient component in aqua feed. Since farm certification may not sufficiently cover marine ingredients in feed this is an area in the Codes that may be overlooked and improvements not required where necessary.

Source fisheries either undergo a MSC full assessment or have a defined action plan to ensure they commit to and achieve certification and can therefore be sourced from. In some instances, products are also sourced from fisheries rated as 3 by the MCS. All fisheries are required to make demonstrable progress towards achieving certification to obtain a low risk rating according to the SSC Codes. There is no requirement that improvements are public via a FIP.

Traceability

Certified product lines, farms and suppliers are able to trace seafood back to individual farms or vessels. Additionally, some the Member's suppliers have comprehensive due diligence processes in place to ensure products are sourced from vessels with no links to IUU fishing. In order to confirm the authenticity and legality of source vessels, catch certificates are verified.

Labelling and claims

Member P relies on sourcing from fisheries and farms with an MCS rating of 1-3, except for when no MCS rating is available. If a rating is available the follow ups are made with supplier to ascertain whether or not sustainable claims can be made on product labels. This method of checking the sustainability is due to be strengthened in the near future.

The Member is not yet making either on or off product 'sustainably sourced' or 'responsibly sourced' claims. They are beginning to recognise when sourcing meets the Labelling Codes internally and may decide to make claims in the future. They are however promoting the SSC off product and claiming to be an SSC Member.

Scope

All seafood is in scope is for the Members' outlets located in the UK.

Member Q

Sourcing Code			Labelling Code		
Policy meets Code	*Available* ✓		**Sustainability claims** meet Code	*On Pack* No data	
	Public ✓			*Off Pack* N/A	
Risk Assessment meets Code	No data		**Responsibility claims** meet Code	*On Pack* No data	
				Off Pack ✓	
Improvement plans exist	*Farms* No data		**In Scope** (% of own-brand products)	100%*	
	Fisheries No data				

* Includes where seafood is a significant characteristic ingredient i.e. coasted fish, ready meals, sandwiches, sandwich fillers.

Sourcing Policy

Member Q is a retailer providing a variety of products to consumers in the UK. They have a Fish & Seafood Responsible Sourcing policy and modern slavery act statement available to the public on their website. The policy is in line with the SSC Codes and explains to the public how they undertake responsible sourcing to improve the sustainability of seafood sources. All sources of farmed and wild seafood are available on the website however this does not include the risk assessment results or improvement actions that are in place.

Risk assessment and improvement actions

This Member follows five key principles, which guarantee that all own label fish is 100% responsibly sourced. All these own brand seafood products are risk assessed through using Decision Trees for both Aquaculture Sourcing and Wild Capture Fish. The risk assessment includes marine ingredients in feed to ensure that wild fisheries are responsibly managed.

Moreover, the whole supply chain is risk assessed to identify any areas of concern and further guarantee that all fish have been caught responsibly. If any issues are discovered, then a fish technologist monitors the situation and provides regular updates to inform sourcing decisions.

It was not possible to check the specific examples as data was not received.

Traceability

All suppliers of fish are required to have full traceability, so that the method of capture can be identified.

Scope

100% of own label products.

Member R

Sourcing Code			Labelling Code		
Policy meets Code	*Available* ✓		**Sustainability claims** meet Code	*On Pack* N/A*	
	Public ✗			*Off Pack* N/A	
Risk Assessment meets Code	✓		**Responsibility claims** meet Code	*On Pack* ✓	
				Off Pack ✓	
Improvement plans exist	*Farms* ✓		**In Scope** (% of own-brand products)	100%	
	Fisheries ✓				

* Does not use sustainability claim on or off pack (artwork decided by retailer)
SSC Member R is a fish processor supplying wild and farmed fish to retailers.

Sourcing policy

Member R only sources from certified sustainable sources such as MSC, ASC, Global GAP and BAP. The sourcing policies are not publicly available. Instead, the member presents general information on their website through case study articles and their product pages. All policies and procedures are reviewed annually. Member R does make their basic policy public and historical sourcing on their Ocean Disclosure Page as well as current sourcing on Fish Choice. Sourcing decisions are based on the outcome of the risk assessment or audit. The risk assessment reviews gear types, processors and other elements of the supply chain for wild, farm name, feed type and certifications, feed company and welfare data.

Risk Assessment

Information is gathered from multiple sources on the fisheries using the SSC decision tree to consider whether to source or not. A risk assessment is conducted for both wild and farmed seafood regularly

and reviewed in accordance with the Sourcing Code. In addition, an assessment is undertaken prior to supply and from then on, every 3 years. The risk assessment is undertaken, and a decision is made on approval. If a source is approved with conditions, then this is followed up with regular communication to meet the improvements identified.

All species require the same level of risk assessment for sustainability with varying conditions depending on whether farmed or wild caught. Due to the Member's commitments to MSC/ASC and FIPs the Member is aligned with the SSC decision tree. For farmed supplies the Member ensures traceability to feed but it is not clear from the information provided how feed is risk assessed and improved where necessary.

Member R carries out risk assessments for human and labour rights. They support the Responsible Fishing Scheme and works with the Ethical Trading Standards within the company and its supply chains.

Improvement actions

The risk assessment is assessed, and a decision is made on approval. If a source is approved with conditions, then engagement and/or monitoring improvements is required and this is followed up with regular communication to meet the improvements identified.

Traceability

All wild-caught seafood can be traced back to a source fishery and vessel, all farmed seafood can be traced back to the farm and feed traced back to its sources. Regular traceability checks are carried out by Member R to ensure this is being upheld.

MSC ensures traceability and traces are carried out on raw materials regularly. Information provided by the supplier is checked against publicly available information where possible.

Labelling and claims

Products are own-brand for retailers and as such Member R does not decide what is included on the packaging. All wild-caught fish is MSC and therefore has the MSC label and states 'responsibly sourced.' The Member receives an email from the retailer to say a product artwork is ready for approval, the technical team download and assess the artwork against a checklist which is sent around to different departments for comments. Once completed the Member will send back all the comments to the customer for final approval.

Off product on the Member's website there is a commitment to the SSC and the Codes plus the SSC logo. The 'Responsible Sourcing' commitment is also listed on the company website.

Scope

The company estimates that 100% of seafood products are in scope with the codes.

Member S

Sourcing Code		Labelling Code	
Policy meets Code	*Available* ✔	**Sustainability claims** meet Code	*On Pack* N/A
	Public ✖		*Off Pack* ✖
Risk Assessment meets Code	✖	**Responsibility claims** meet Code	*On Pack* N/A
			Off Pack N/A
Improvement plans exist	*Farms* N/A	**In Scope** (% of own-brand products)	100%
	Fisheries N/A		

SSC Member S is an aquaculture producer of one type of fish.

Sourcing policy

Member S is a primary producer and as such some aspects of the Sourcing Code may not be applied in the same way as with the buying organisations. Expectations around traceability and souring policies are less relevant to this Member. The Member's policy is to produce farmed fish in compliance with the standards required by the market; ASC and BAP. In addition they apply supplementary measures to ensure environmental impacts of production are minimised.

Risk Assessment

This Member uses sites that are all third party certified, including ASC, GAA BAP and BRC. This helps to minimise any risk involved with supplying their product. This is however no mention of assessing the marine ingredients used in feed outside of what is required by the certifications. At this point it is not clear whether this is in line with the codes since the certifications cover marine ingredients in feed differently.

Improvement actions

The production sites are certified and there are no specific improvement actions noted. However, the Member is clearly working on minimising the environmental impact of production by applying best production practices.

Traceability

As Member S controls the entire life-cycle of their fish, from brood stock to finished product, they are able to trace fish back to their origin.

Labelling and claims

There are various 'sustainability' claims being made off-product and since this is for aquaculture production; this is not in line with the Codes. There does not seem to be any 'responsibly sourced' claims or claims made on product but it was not possible to view any product as part of this research.

Scope

All production is considered to be within the scope of the SSC.

Member T

Sourcing Code			Labelling Code		
Policy meets Code	*Available* ✓		**Sustainability claims** meet Code	*On Pack* No data	
	Public ✓			*Off Pack* ✓	
Risk Assessment meets Code	No data		**Responsibility claims** meet Code	*On Pack* No data	
				Off Pack N/A	
Improvement plans exist	*Farms* No data		**In Scope** (% of own-brand products)	100%	
	Fisheries ✓				

Sourcing Policy

SSC Member T is a retailer and has a comprehensive seafood sourcing policy (for both wild-harvest and aquaculture) which is publicly accessible via their website. The policy follows the SSC Codes and includes traceability and transparency, risk assessment and audit practices, labelling, human rights, and specifics for major product groups (i.e. canned seafood, tuna, etc.).

Risk assessment

Risk assessments are undertaken for the sourcing of all seafood and internal stakeholders within buying, marketing and branding and packaging are trained on the Codes as part of the sustainable

seafood policy. It is unsure whether any high-risk product has not been sourced due to not meeting the Codes. The risk assessment includes the requirements of the SSC Codes including for farmed sources the Marine feed ingredient sources.

In line with their membership of the Sustainable Seafood Coalition, the member is committed to risk assessing the status of its fishery and aquaculture sources on an annual basis. This is conducted alongside the review of their seafood policy and through the assessment of compliance to the commitments in their seafood policy.

Improvement actions

The Member is committed to various improvement actions which have been made explicit within their Seafood Sourcing Policy. This includes the expectation that over time and as availability of certified sources increases, tuna will be sourced from within either a credible fishery improvement project or an MSC certified fishery. Likewise, there are other cases where the member has actively contributed to FIPs and their progression, including through funding.

Traceability

Member T has a commitment to third party schemes where they are able to verify the traceability of the products. In addition, the Members suppliers are required to hold traceability information as part of their Terms and Conditions, which can be requested at any point in time. This is systematically captured and validated annually as part of our Oceans Disclosure Project (ODP) declaration.

Labelling and Claims

There is a two stage sign off process for communications regarding seafood and, if they include claims, this process includes the CSR team. The Member website commits to the SSC Labelling Code and provides information on the SSC an link to the SSC website.

Off-product the Member claims to sustainably source all wild fisheries, however the information on the Ocean Disclosure project finds some fisheries in FIPs or not yet in improvement. It should be noted that the ODP data is historical and it could be the case that now that all wild fish is sustainably sourced but this is not clear based on the available information. There did not seem to be any responsibly sourced claims off product.

Scope

Currently the policy does not include home range pet food but will do so by the end of 2020 by using MSC certified sources.

Member U

Sourcing Code			Labelling Code		
Policy meets Code	*Available* ✓		**Sustainability claims** meet Code	*On Pack* N/A	
	Public ✓			*Off Pack* ✓	
Risk Assessment meets Code	✓		**Responsibility claims** meet Code	*On Pack* N/A	
				Off Pack ✓	
Improvement plans exist	*Farms* N/A		**In Scope** (% of own-brand products)	100%	
	Fisheries ✓				

Sourcing Policy

SSC Member U maintains a public sustainability policy which is available on their website. The policy sets out the baseline standard for supply to their business, however, it is underpinned by an internal risk assessment process in which specific management actions are detailed and set out with regards to sourcing decisions. The policy is available on the company website and there is a commitment to the SSC Codes stated along with a link to the SSC website.

Risk assessment

The risk assessment is explicitly based upon the SSC Sourcing Code. Each section of their internal risk assessment is mapped against the SSC Codes. Additionally, the Member holds an internal IUU/human rights risk assessment, mapped against PAS 1550: 2017 guidance, through which all seafood suppliers (own-label and branded) are risk assessed.

Furthermore, the Member maintains an internal 'Tuna Sourcing Policy' that all tuna suppliers are required to sign prior to commencement of supply. This sets out specific preconditions for tuna suppliers and vessels; i.e. PVR registration, non-entangling FADs, etc. This Tuna Sourcing Policy is reviewed on an annual basis.

A number of certified sustainable fisheries are also sourced from.

Improvement actions

Through the Member's risk assessment, two products were listed as high risk and the Member is taking engagement actions in the form of FIPs to meet SSC requirements. Further to this, the Member is also

undertaking FIPs for products listed as medium risk according to the SSC Codes. Whilst the company is sourcing from the FIP, in one example provided they are not listed as a FIP participant. More clarification would be helpful about how they are engaging in the improvements.

Traceability

All of the Member's seafood products are traceable from their can code, back to the vessel(s), area of fishing, species, date, and fishing gear. Their suppliers provide them with full documentation which allows them to complete traceability exercises within a 24-hour maximum time, however this is usually possible within 3 hours. The Member also conducts regular internal traceability exercises to ensure they are meeting this goal.

Labelling and claims

The Member maintains a number of internal policies, procedures, and records that describe the process of artwork generation and approval in regard to labelling and claims. The Member's policy regarding product legality and labelling requires documented processes that allow for verification of branded products bear the appropriate information in relation to SSC Codes. The environmental claims used are 'responsibly fished' or 'sustainably sourced'. There seems to be a minor mistake on the website which states the SSC Labelling Code relates to on pack claims, however the Codes relates to all environmental claims made by the Member.

Scope

100% of own-brand fish products are in scope.

Member V

Sourcing Code			Labelling Code		
Policy meets Code	*Available* ✗		**Sustainability claims** meet Code	*On Pack* N/A	
	Public ✗			*Off Pack* ✗	
Risk Assessment meets Code	✓		**Responsibility claims** meet Code	*On Pack* N/A	
				Off Pack ✗	
Improvement plans exist	*Farms* ✗		**In Scope** (% of own-brand products)	100%	
	Fisheries ✗				

SSC Member V provides food to a wide variety of restaurants and pubs. They aim to supply seafood with a focus on seasonality, fish availability in the UK and avoiding sourcing any risk fish ranked 4 or 5 by the MCS.

Sourcing policy

This Member has a summary sustainability policy that is accessible through their website. This policy is not specific to seafood, however the Member partnered with their supplier due to their robust sustainability policy and as such it is not essential that the Member's website is not seafood specific as they supply many other product categories. The Member relies on their supplier who they receive seafood from, who does have a policy, which details how they ensure sustainable seafood.

Risk Assessment

This Member works closely with a wholesaler which has a robust risk assessment in place and uses MCS ratings to ensure that they supply low risk seafood. The examples of the risk assessments reviewed showed how actions were taken, which generally wereto not source rather than to improve the source.

Improvement actions

In order to ensure they are able to monitor the quality of the seafood they supply, this Member forms long lasting relationships with their suppliers. There were no improvement actions listed on the examples provided even if risks were identified and the source was not certified. The organisation does not seem yet to be engaging in improvement actions for uncertified sources. Further information is needed to determine engagement in improvement work.

Traceability

Their sustainability policy states that they keep every supply chain as short as possible, so that they can trace the origin of the products they supply. In addition, they prefer to use sources which are third party accredited – for seafood products this member uses sources that are MSC certified.

Labelling and claims

Off-product the Member claims both sustainable sourcing and responsibly fished with regard to their seafood. The claim seems to be that all seafood is certified but there is a lack of detail in the information reviewed and further information would be needed in order to clarify this is the case. There is also farmed salmon in the product range which following the Codes should not be described as sustainable sourced.

Scope

The Member did not provide an estimtate for the proportion of their seafood products included in the scope of the Codes.

Member W

Sourcing Code			Labelling Code		
Policy		*Available*	**Sustainability claims** meet Code		*On Pack*
	meets Code	✓			N/A
		Public			*Off Pack*

Risk Assessment meets Code	✔	**Responsibility claims** meet Code	*On Pack* ✔	
			Off Pack N/A	
Improvement plans exist	*Farms* N/A	**In Scope** (% of own-brand products)	100%	
	Fisheries N/A			

Sourcing Policy

Member W is a company which works closely with their suppliers to implement the SSC Codes. These commitments are maintained through approval and monitoring procedures.

This Member also makes it clear how they can ensure their products are sustainable through detailed graphics on their website. These graphics convey the key points regarding the journey their seafood follows from source to finished product.

Risk assessment and improvement actions

The Member uses a BAP risk assessment out to assess food safety, quality, hygiene and legality. Moreover, this Member ensures that every part of their supply chain is accredited by a third-party, including the packaging location. This Member also has approval and monitoring procedures in place, which include audits, questionnaires, certificates of analysis, compliant levels, and required performance standards.

Traceability

Full traceability is ensured through the identification of product lots and their relation to batches of raw materials, packaging, whilst also maintaining all relevant QC records from receiving, processing and distribution.

Labelling and claims

Member W carries out routine checks on raw materials and finished products to make sure that all labelling on product are in line with EU requirements. All packs are in accordance with FSA labelling and approved by directors. The packs themselves are then packed by a BRC accredited 3rd party provider in Grimsby. Off product the Member uses the claim 'Ethically sourced' and also 'sustainable' on the website relating to aquaculture, which did not seem to be following the Codes. On product is stated

'responsibly farmed', which does seem in line with the Codes. Responsibly sourced claims were not found off-product. The Member website displays the SSC commitment with a link to the SSC website.

Scope

100% of this Members seafood is within the scope of the SSC Codes.

Member X

Sourcing Code		Labelling Code	
Policy meets Code	*Available* ✓	**Sustainability claims** meet Code	*On Pack* N/A
	Public ✓		*Off Pack* ✓
Risk Assessment meets Code	✓	**Responsibility claims** meet Code	*On Pack* ✓
			Off Pack ✓
Improvement plans exist	*Farms* ✓	**In Scope** (% of own-brand products)	100%
	Fisheries ✓		

Sourcing Policy

SSC Member X is a seafood and aquaculture business with farming and processing operations. The Sourcing Policy is public on the Member's website and covers compliance with SSC Sourcing and Labelling Codes. It states the Member's objective to source from certified sources and to establish improvement projects where needed.

For aquaculture sourcing the Member requires that responsible management of supply farms and their seed and feed suppliers is confirmed by third-party certifications, including, ASC, BAP & EU Organic. For wild capture the Member aims for MSC certification of fisheries where possible or an alternative independent validation of sustainable practices in place. They also require establishing or supporting FIPs and other improvement actions where necessary.

Risk assessment and improvement actions

From the Member's information, one high-risk fishery has been sourced from, and there is an engagement action in the form of a FIP for this source. The Member demonstrates their active

participation in the improvement project with financial contributions and support. Likewise, there is medium and low risk sourcing taking place, with one engagement action (also a FIP) taking place for the medium risk species. Several sources come from certified origins. Marine ingredients in aquaculture feed undergo risk assessment to ensure that the source is MarinTrust certified or has been through a complete FIP process (in MSC full assessment).

Traceability

The Member provided their risk assessment process for this report and it classifies whether valid SSC Labelling claims can be made. In the Member's risk assessment process, traceability documentation is provided by the supplier for all product shipments. This documentation includes product batch number, related farm names and pond number, supply hatcheries, feeds applied to ponds (brand and specification). Traceability exercises are regularly conducted with suppliers to verify the accuracy of shipment information. Information on feed ingredients is collected from supply feed mills once a year.

Labelling and claims

The Member further provided multiple examples of their risk assessment and subsequent packaging of their products. If this is a own brand product then it holds a responsibly sourced section, however where it is packed for another business, then the responsibly sourced claim may or may not be made depending on the customer policy. It was not found that the sustainably sourced claim is used on-product.

Scope

All the seafood products sourced for the UK market are in scope; 'out of scope' materials are non-seafood products, and non-edible materials of marine origin such as empty shells.

Member Y

Sourcing Code		Labelling Code	
Policy meets Code	*Available* ✓	**Sustainability claims** meet Code	*On Pack* ✓
	Public ✗		*Off Pack* ✗
Risk Assessment meets Code	✓	**Responsibility claims** meet Code	*On Pack* ✓
			Off Pack ✓
Improvement plans exist	*Farms* ✓	**In Scope** (% of own-brand products)	90-95%
	Fisheries ✓		

SSC Member Y is a supplier of farmed and wild seafood products to retailers.

Sourcing policy

Member Y has policies and procedures in place that meet the Codes, through targeting sources that are third-party certified. These sourcing policies, however, are not communicated in their entirety to the public. Instead, the Member presents general information on their website through case study articles and their product pages. A Modern Slavery Statement is available on this Member's website for the public to view.

Risk Assessment

Risk assessments are carried out to the SSC Codes including specific information on the source relating to the elements required by the Codes. For instance, referencing a recognised Fisheries Improvement Project where this has been deemed necessary by the risk assessment. In order for the member to meet the Code's social and ethical requirements, they ensure that all supplies are registered on SEDEX or BSCI. If necessary, they also ensure that social audits are carried out regularly. All feed mills supplying the aquaculture operations are required to be certified and must use Marin Trust or MSC certified fisheries for their fish meal and fish oils. However, a point to note is that Marin Trust does not certify fisheries so there may be some confusion on this point by the Member.

Improvement actions

The Member has followed the Codes for improvement actions where they have been deemed necessary by the risk assessment, such as in the case of wild sources by identifying the relevant FIP. It is

not clear how the source was confirmed as being part of the FIP or how this is verified, therefore determining a method of verification may be a way to strengthen the process.

Traceability

The Member also claims to only source from fisheries with evidence of full traceability back to the original fishery, including traceable boats and traceable landing sites. Member Y can trace all their raw materials back to their supplying fishery or farm/ hatchery. Moreover, all of their suppliers must be able to demonstrate their traceability back to process facilities, grow-out farms, hatcheries and broodstock sources. Another prerequisite is that all feed ingredients need to also be fully traceable.

Labelling and online communications

If Member Y sources from a location that is not third-party certified, then they do not make any labelling claims regarding the source's sustainability or responsibility.

On their website there are claims regarding their sustainable and ethical sourcing. These include the methods of harvesting and appear to be in line with the Codes. There are additional environmental claims on Member Y's website which do not appear to relate to the Codes such as 'environmentally friendly'. The Member labels some of their aquaculture products as sustainable online, which does not align with the Codes.

There were five specific examples provided by the Member about sourcing and products meeting the Codes including wild and farmed seafood. The approach in each case was to follow the Codes and collect as much information on the source as possible noting which claims were permitted to be used.

Scope

The company estimates that 90-95% of seafood products are in scope with the Codes. Some by-products and miscellaneous species are not considered in scope.

Member Z

Sourcing Code			Labelling Code		
Policy meets Code	*Available* ✓		**Sustainability claims** meet Code	*On Pack* ✓	
	Public ✓			*Off Pack* ✗	
Risk Assessment meets Code	✓		**Responsibility claims** meet Code	*On Pack* ✓	
				Off Pack ✓	
Improvement plans exist	*Farms* N/A		**In Scope** (% of own-brand products)	100%	
	Fisheries ✓				

SSC Member Z is a supplier of wild seafood products to retailers.

Sourcing policy

The Member has policies and procedures in place that meet the Codes, through targeting sources that are third party certified. The sourcing policies are publicly available, reviewed annually, and there are summaries of sourcing policies and credentials available on the website. In addition the policy is shared with all the Member's supply chain partners who supply them with fish products. On their website there are many claims regarding their sustainable and ethical sourcing.

The policy outlines the Member's commitment to sustainable sourcing and base sourcing decisions on environmental credentials. The policy is supported by an approval process that ensures all new fish raw material is reviewed for compliance before it is approved for supply.

Member Z continuously assesses human rights risks in the supply chains which is included in the risk assessment. The Member is engaged in adhering to the Ethical Trade Initiative Base Code and is a supporter of the Dhaka Principles.

Risk Assessment

The Member has an extensive risk assessment process for each of the sample species selected, the risk assessment includes their labelling and SSC compliance assessment and the results of the risk assessment will determine whether a claim can be made in accordance with the Codes. The risk assessment is conducted annually for all species and fisheries in which they source. Any new fisheries

are assessed before the supply commences in accordance with the SSC guidelines. The process of the risk assessment follows the SSC guidelines.

Improvement actions

Where Member Z has identified high risk species, in accordance with the Codes, they have acted. This has included advocacy to encourage cross sector collaboration as a mechanism to drive change. The Member sources from fisheries that are MSC certified or in a credible FIP. Member Z will consider sourcing outside these parameters in order to develop fisheries where they can demonstrate fish stocks are sustainable and they are proactively moving towards a FIP or certification. This action is only permitted to progress small scale fisheries access to markets as per UNDG14. For one of the high risk sources the Member is sourcing from the country where the FIP is located and the Member monitors the progress. Although the Member is not named as engaging officially on the FIP, the Member will take action if there is no progress being made as well as encouraging their supplier to engage in the FIP. Due to COVID-19 the FIP plan to enter certification has been delayed and there are plans for it to enter MSC full assessment in 2020 with the next report due in January 2021.

Traceability

Traceability assurance processes follows the same principles in the risk assessment which includes full traceability back to the vessel. The sourcing policy includes the Member's traceability practices.

Labelling and claims

The Member has an extensive risk assessment process for each of the sample species selected, the risk assessment includes their labelling and SSC compliance assessment and the results of the risk assessment will determine whether a claim can be made in accordance with the Codes.

The sourcing policy includes the use of the terms responsible and sustainable as defined by the Codes. All packaging including claims on printed packaging is managed by trained members of the technical team. All external communications are signed off by the Operations Director which includes any uploads to the website. Off pack the company claims to only source sustainable fish but according to the SSC Codes some would be considered only as responsibly sourced.

Scope

The company estimates that 100% of seafood products are in scope with the Codes. There are some fish derivatives in their recipe products which fall out of scope of the SSC commitments. However, the Member is taking action using a different approach of sourcing these ingredients under a priority raw materials project.Progress is tracked to assess whether the planned actions for the responsible and sustainable sourcing of raw materials are delivered.

Member AA

Sourcing Code		Labelling Code	
Policy meets Code	*Available* ✔ *Public* ✘	**Sustainability claims** meet Code	*On Pack* *N/A* *Off Pack* ✘
Risk Assessment meets Code	✔	**Responsibility claims** meet Code	*On Pack* ✔ *Off Pack* ✔
Improvement plans exist	*Farms* *N/A* *Fisheries* *N/A*	**In Scope** (% of own-brand products)	100%

Sourcing Policy and Transparency

Member AA is a primary producer and as such some aspects of the Sourcing Code may not be applied in the same way as with the buying organisations. For example, expectations around traceability and public sourcing policies are less relevant to this Member. Member AA's website has a 'Sustainability' section, which makes several claims about how they ensure that they operate sustainably, organically and that the farmed source is responsibly managed. In addition, the website gives further details on the measures in place to guarantee traceability, sustainability and freshness. In lieu of a public sourcing policy, general information relating to how the Member produces seafood is available and is therefore in line with the Codes.

Risk assessment and improvement actions

This Member only sources farmed seafood, which is BAP certified, which demonstrates the company's stance in relation to environmental responsibility, social responsibility, food safety, animal health and welfare, and traceability. A policy for monitoring improvement actions is not explained on the website, however the company must maintain high standards to receive their BAP certification.

Traceability

Due to this Member producing seafood at one site that they manage themselves, they can know where all their product has come from. This is verified by the site being BAP certified, which encompasses traceability as one of its requirements.

Labelling and claims

It was not possible to see any labels made on any packaging. There are claims that made on the website regarding sustainability which is not in line with the SSC Labelling Code. The responsible production and sourcing claims are in line with the Codes, due to their BAP certification. There is also an organic claim made.

Scope

100% of this Member's seafood is within scope of the SSC.

3.3 Summary of findings

The infographic below (Figure 2) summarises performance against the SSC Sourcing and Labelling Codes across all the Members involved in study.

Sourcing Code		Labelling Code	
Policy meets Code	*Available* **96%**	**Sustainability claims** meet Code	*On Pack* **91%** (13 N/A, 2 No data)
	Public **56%**		*Off-Pack* **53%** (8 N/A)
Risk Assessment meets Code	**88%** (1 N/A, 2 No data)	**Responsibility claims** meet Code	*On Pack* **100%** (7 N/A, 2 No data)
			Off-Pack **95%** (6 N/A)
Improvement plans	*Farms* **93%** (9 N/A, 2 No data)	**In Scope** (% of products)	**>90%**
	Fisheries **95%** (5 N/A, 1 No data)		

Figure 2 Summary across members on adherence to the SSC Sourcing and Labelling Code

3.3.1 Sourcing Policies

96% members had sourcing policies in line with the SSC Sourcing Code. In some instances Members had binary policies where all sourced products had to be 3rd party certified, or would not be sourced. In other instances, Members may decide to source only from low or medium risk, while others would source from higher risk categories but ensure they were on an improvement programme. For instance, some choose to encourage a broader range of locally sourced species to reduce pressure on major commercial species but which may involve engaging with higher risk sources. Many Members' sourcing policies were heavily linked to their risk assessments and many mentioned that their policies were regularly reviewed either annually or every 2 or 3 years.

Just over half of Members (56%) made their sourcing policies public, but 44% did not have them available to the public and 1 (4%) Member did not have a sourcing policy at all. 13% were partially available and have been included in the percentage where not publicly available. In many cases,

members had a general policy available on their websites which was backed up by a more detailed internal document.

There appears to be an increasing trend for Members to have some form of social or ethical sourcing policy with 44% of Members (12) stating they had an ethical policy or a modern slavery statement. As well as labour risks, other issues that fed into Member's sourcing policies to a greater or lesser extent include: ghost gear; fish welfare; transhipment; Marine Protected Areas (MPAs); reducing packaging; and carbon footprint.

3.3.2   Risk assessments

All Members undertook risk assessments in line with the SSC Sourcing Code. Many use the SSC check lists and decision trees to undertake their assessments, while others adapt the lists or are transitioning towards SSC from other approaches. Other Members use the Marine Conservation Society (MCS) Good Fish Guide with its 5 risk-levels; or ensure that their risk approach is reviewed by an NGO or another 3rd party. This is in line with the Code which states that, "*Members can choose to use a risk assessment created by another body or one developed on their own*."

Most members update their risk assessments annually, although some undertake this more regularly: for instance every 6 months or even on a monthly basis. This review may include checking progress against audits or fishery improvement plans as well as assessing updated scientific advice such as the ICES reports.

As an illustration that the risk assessments are working, there were clear examples given by Members of where a seafood supply is not sourced from due to the risks assessed as part of the SSC Code.

3.3.3   Fishery improvements

The majority of Members mentioned engagement with fishery improvements (apart from those that will only source certified product), with one Member stating engagement with as many as 20 improvement projects. The general approach of Members was to monitor engagement plans / improvements annually or bi-annually. For fisheries this seems appropriate due to the nature of fisheries taking years to implement changes and FIP workplans usually spanning 5 years. For farms the corrective actions may take less time to implement but surveillance of certification programs are typically annual and so these monitoring timeframes could be considered adequate.

One aspect that did not appear clear, however, was what is considered a sufficient improvement, with different language being used by different members, such as 'active FIPs'; 'credible FIPs', or FIPs that score C or higher on Fisheryprogress.org.

3.3.4   Traceability

There were a wide range of approaches mentioned for ensuring traceability, with four Members mentioning the ODP. This was launched in 2015 by Sustainable Fisheries Partnership as a reporting framework for seafood-buying companies to voluntarily disclose their wild-caught seafood sourcing alongside information on the environmental performance of each source. Since 2019, ODP includes disclosures of farmed seafood sources. Some Members are in the process of creating ODP profiles. Members often mentioned the importance of ODP in ensuring transparency to customers.

Members mentioned a range of tools that are used to ensure traceability including: the chain of custody within the MSC & ASC programmes; QR codes at each stage of the supply chain; and audits and

IUU due diligence processes using catch certificates to verify traceability. Some Members provide clear graphics on their websites illustrating the key points on the supply-chain journey to encourage public knowledge on traceability. The information provided to Members is often cross-checked multiple times by different teams within the companies whilst relying on VMS and AIS vessel tracking to confirm where fishing vessels have been fishing and that there are no anomalies.

The GDST an international platform with a unified framework for seafood traceability practices which also encourages digital approaches to traceability. The GDST has provided an impetus for Members to benchmark the tools they are currently using and move towards digital traceability systems rather than paper-based methods.

There were some differences between the species examples that were selected as part of the second round data request. In all cases suppliers were expected to not be linked to IUU fishing.

3.3.5   Labelling and claims

On-pack labelling

Based on the information provided, and verified where possible, Members adhere to the SSC Labelling Code for on-pack labelling. A number of Members described the sign-off process for artwork; which in some cases, if certified, would be sent to the appropriate 3rd party for approval or would involve collaboration between the technical and CSR or marketing teams.

There were some observations on the use of the responsibility and sustainability claims used:

- Examples where Members are following the code but not using the responsible or sustainable claim;
- Examples where a product is MSC certified but the logo or sustainability claim is not used (but in some cases only the responsibly sourced claimed used).

Social media

Many members reported that marketing teams check with the technical and/or sourcing team before social media claims are made, as well as training staff on the policy within their buying, marketing and brand departments.

A sample of Members' social media sites and websites were checked as part of the study.

Twitter and Instagram were selected as the main social media outlets as they tend to be the platforms where the level of seafood marketing is more prominent, especially big retailers. The sample search went back to the beginning of 2019. Some Members do not appear to make any claims of responsible, sustainable or sourcing about their seafood or seafood ingredients on their social media accounts.

Others Members have made specific mention of 'responsibly sourced', catch methods and some talked about the scope of their seafood policy 'applying to all own label fish' which adheres to the Codes. Some members took advantage of the #SustainableSeafood to market their MSC certified products with an accompanying #responsiblysourced claim, meeting the Codes requirements. Some Members make general claims within their page information as 'responsibly sourced'. There were no instances found where Members did not meet the Codes on social media.

Reference to the SSC Codes in a social media campaign were only made by one retailer (Waitrose) in a [television campaign](#) which was also released on their YouTube channel. In line with the SSC Codes, the campaign stated 'all Waitrose own label fish are responsibly sourced to Sustainable Seafood Coalition guidelines.' Otherwise, unless visiting the SSC website or Member web pages there is not much publicly distributed information about the Codes by the Members on social media campaigns.

Some Members mention the SSC Codes in particular on their sustainability pages on their websites and include the logo on their sites. This is more notably the Members who only source and sell seafood products, whereas a few of the larger retailers are broader on their sustainability website pages. Other Members go into more detail explaining their claims by stating that seafood is traced back to vessel and explaining the different catch methods.

Websites

Unlike social media claims, it seemed that not all websites were up to date, and in some cases made different claims to the ones within the Member's seafood sourcing policy as provided.

3.3.6   Environmental claims

As well as the claims on 'sustainably' and 'responsibly' sourced seafood which are covered by the SSC Codes, there are also a number of other claims being used by some Members. These include:

- FAD-free
- Dolphin safe
- Environmentally friendly
- Minimal environmental impact
- 100% Traceable
- Traditionally caught
- Organic

> *'100% of our fresh and frozen seafood comes from sustainable fisheries or responsibly managed farms.'*
>
> *'As members of the Sustainable Seafood Coalition, we actively work with our fishery partners to ensure their ongoing prosperity.'*
>
> *'We source only sustainable fish of the highest quality.'*
>
> *'We're committed to responsibly sourcing'*
>
> *'We have committed to the Sustainable Seafood Coalition's voluntary Code of Conduct on environmentally responsible fish and seafood sourcing.'*

Figure 3: Environmental claims made on seafood website pages by the Members

3.3.7   Scope

It was found that 27 Members confirmed that all of their own-brand sourced seafood is within scope of the SSC Codes meaning >90% met the SSC Codes with regard to scope.

Exclusions

Some Members interpreted scope as applying only to own-brand products, while others included all seafood supplies.

There are also other exceptions. It has been agreed at a recent SSC meeting that pet food it still out of scope, but some members include it within scope or are planning to do so within a specific timeframe. Other exclusions included fish stocks or flavourings used in meals; non-edible seafood (i.e. shells), pharmaceuticals and fish gelatine. In other cases where the seafood is less than 1% of the product it is often not considered in scope by members i.e. the Codes are not applied.

Marine ingredients within aquaculture feed

There were differences noted between the interpretation and application of the Codes around marine ingredients within aquaculture feed by Members. There is a requirement for them to be assessed and some Members assessed them directly whereas others relied on farm certification to deliver the assessment. However, the farm certification standards used by Members are not aligned with the Code in the sense that they do not always require checks on the sustainability of any wild-caught ingredient in the feed. However, there have been developments with feed fishery assessments. For example, Marin Trust (which is now an ISEAL full-member) includes some assessment and improvement in place for marine ingredients at fishery level even though unit of certification is at the plant-level.

The team tried to distinguish between situations with marine ingredients that were in line with the Codes, but this is open to interpretation at the moment. The situation is not clear-cut and there are also upcoming developments in aquaculture certification standards around feed (e.g. the finalisation of the ASC Feed standard) which may need reviewing to incorporate them in the Codes. The lack of clarity may be causing uneven interpretation of the Codes and it is something that would benefit from investigation by the SSC. This is further considered below in the following section.

4   Conclusions and Recommendations

These conclusions are based on Charmelian's findings from the information provided to us by the SSC Members during the course of the study. There are three areas for the SSC to consider in order to strengthen the success of the SSC model and the consistency with which the Codes are being implemented: 1) Measuring and increasing the impact of the Codes; 2) Better application of the existing Codes; and 3) Developing the SSC model and renewing theCodes.

4.1   Impacts of the codes

- *Adherence to the codes*

From the information provided by Members the Codes appear to be being applied and have been valuable by helping to identify the number of seafood supplies into the UK that come from certified sources or are part of a FIP. It was common to find that the SSC Members were well aware of the SSC Codes and that they were being applied, for instance one Member stated that; *"All key functions within the organisation are aware of the SSC Codes and the company's commitment to their adherence."*

However, there was some uncertainty around whether adherence to the Codes was actually resulting in any specific impact. For instance, whether the codes were the cause of improvements or just reflecting what is already being done; as one Member put it, *"SSC Codes do not result in instances of any further due diligence because of stronger procedures."* Further investigation with SSC Members would be necessary to understand the impact of member adherence to the codes. (See below for more detail on measuring impact of the Codes).

- *Engagement and improvements*

It was found that SSC Members were engaging with their supply chains to improve the sustainability of their farmed and wild-caught seafood sources. A number of Members talked of improvement actions and have had meaningful engagement with suppliers to drive environmental improvements. The Codes may have helped encourage such action and engagement, however this needs further investigation with Members.

Overall, 27 Members include >90% of their seafood products in the scope of the SSC Codes i.e. they apply the Codes to their own-brand seafood products and apply risk assessments in accordance with the Codes. Where products fall into a high risk categories the members have shown they are engaging in improvement actions.

It was noted that outside of the immediate SSC community, there was not much understanding of what the SSC is or what it does in contrast to other sustainability initiatives which are well known e.g. MSC, MCS, ASC. This is despite the SSC membership encompassing a significant part of the UK seafood supply chain. The SSC website is in need of a review as it is difficult to find information including the Codes and latest versions of Guidance or meeting notes. Perhaps a working group would be helpful in order to bring some communications colleagues together. SSC Members could invite their communication departments to participate in a meeting that could take forward some communications initiatives.

- *Increased advocacy*

There has been also increased advocacy effort from the SSC as a collective. Some Members may have found such advocacy too difficult if acting alone and such collaboration is deemed to be more powerful in creating and supporting change. As one Member put it:

"*The SSC Codes have been a great pillar to rely on when pushing for improvement in different areas. A great example of this has been the North Atlantic Pelagics group. Furthermore, seeing increasing advocacy efforts coming from the SSC has also been helpful, such as for the Fisheries Bill. We sincerely hope to see more coming, maybe including the High Seas Agreement.*"

An example of this is the North Atlantic Pelagic Advocacy (NAPA) group which was set up as a result of SSC Member collaboration and the SSC Codes. In early 2020 SSC Members met with the UK pelagic fishery industry to explain about the codes and to find a solution for maintaining sourcing. As a result SSC has played an important part in improving the fishery.

One of the learnings is that more cross-sectoral communications and outreach is necessary by the SSC. The SSC brings a strong advocacy voice with more leverage than companies working in isolation.

- *Measuring impact*

A better understanding of the impact of the Codes on the SSC aims and vision[1] would help to understand the value of the programme. This would include establishing causal effect on environmental improvements and would help to establish where additional and larger impacts could be made. For example, this could include an assessment of how many products are being put through the SSC Code framework (i.e. those assessed as sustainable/responsible; the value of these products; how many UK products are covered and how much of the market is applying the Codes; impacting how much fish, and how many fisheries and how many countries?).

In terms of wider impacts there were some responses from Members that indicated valuable impacts, and others that highlighted the limitations. In order to properly understand impact it would be necessary to initiate a specific project focussing on how to measure impact and indicators should be chosen and data collected around them. The necessary data could include:

Proportion of market under SSC Codes:

- SSC Member seafood market share
  - Total annual seafood turnover
  - SSC Member seafood market share under the SSC codes

Proportion of certified product:

- No. Certified sources
- Number of products

Clear labelling:

- No. Sustainability claims / % Sustainably sourced
- No. Responsibly sourced claims / % Responsibly sourced

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[1] https://www.sustainableseafoodcoalition.org/vision-and-aims/

Improvements made:

- No. of FIPs coming about as a result of the risk assessment
- Other improvements / engagement actions
- Fisheries entering into MSC assessment as a result of SSC Member action
- No. Corrective action plans agreed
- No. times members 'do not source' due to a risk-assessment

Other issues:

- Qualitative benefits of the Codes
- Examples of mainstreaming SSC into internal processes
- Examples of advocacy support

Since much of this information is confidential and commercially sensitive for the SSC Members it would be advisable to develop the project terms of reference collaboratively between Members. A suitable working group might be the best vehicle for taking this forward.

4.2   Application of the codes

Overall, there was very high alignment with SSC Codes by all 27 commercially active Members that participated in this study. Some potential differences appear to have been as a result of instances where the Codes may have been interpreted differently between Members, or have not been consistently applied across all communication materials (e.g. websites). However this was by no means the same for all members, with many having consistent communication in line with the Codes both on and off-pack.

- *Scope of the codes*

It was found that there was some variances of interpretation around the scope of the Codes between SSC Members. There seems to be an understanding that the Codes only apply to own-brand products and that exclusions from the Codes include pet food and seafood used in products less than 1% of total ingredients. Initially, pet food had a two year time frame that should have been met in 2017 (in SSC guidance document), however this was revised and the timeframe removed from the Aug 2020 version. The research found that most companies were not including pet food in the scope of their Sourcing or Labelling code.

Based on the findings of the 2020 implementation report the situation around the scope of the Codes seems to be divided with some members applying it to all sourcing and others applying it to own-brand only. The Codes are clear that it only needs to be applied to 'own brand' to comply. The 2017 implementation report suggested that the application of the Codes to own-brand products only should be reviewed. This could compliment and strengthen sourcing and inflate the SSC Members overall level of compliance. However, it may give rise to double-counting if both supplier and retailer are SSC Members since sourcing for the SSC Member would be in line with the Codes and it is not clear whether it is possible for one company to take responsibility for another's claim. The apparent issue is whether non-SSC Members can be held to the Codes if their supplier or buyer is an SSC Member. This is a very difficult ask and the solution does seem to be to encourage other organizations to join the SSC, as is stated already in the Codes. If the supplier is a Member and applying the Codes that shouldn't require

the end user to apply the Codes, it just means that they are missing out on the opportunity to make legitimate claims.

Another related issue is whether producers should be individual SSC members, and it would seem that there would need to be a revised version of the Codes or Guidance that could be effectively applied to producers. Perhaps the 'sourcing' language of the Codes needs reviewing or clarifying for producer businesses, or specific Guidance needs writing to support these businesses.

- *Labelling claims*

The growing inconsistency of environmental claims made on canned tuna does not seem in line with the Labeling Code which specifically commits members to ensuring environmental claims are consistent, clear and accurate. It would seem greater guidance on labelling of canned tuna may be necessary.

Labelling on some SSC Member's canned tuna carries the 'dolphin safe' logo or a claim about being 'dolphin friendly'. There are also instances where the 'responsibly sourced' claim is used on its own, together with the dolphin safe logo and in some cases a 'FAD-Free' claim. There does not seem to have been a review of application of the dolphin safe logo or labeling on tuna according to the Codes as recommended in the 2017 report. With the potential also for an MSC logo and/or catch method claim on the can of tuna this could be confusing to a consumer.

The FAD-free claim may be considered as an environmental claim but it is not clear how this is interpreted within the SSC Codes. Claiming that the product was not caught using FADs is not the same as making a claim about a catch-method such as 'pole and line caught' since the catch method for FAD or non-FAD is purse seine. It is not clear if the FAD-free claim is being used as part of the justification for 'responsible sourcing' or as a 'fishery improvement'. This issue would benefit from some clarification.

There also seems to be some different interpretation between members around when to use the 'sustainably sourced' claim. Which is interpreted by one member as MSC certification of the fishery plus third party certification of traceability to the fishery, which seems in line with the SSC Guidance. However other members only associate 'sustainable' with having the MSC logo displayed on the product and including MSC chain of custody. The SSC Guidance document does lay out (in Section 7) about when the sustainably sourced claim could be used setting out minimum criteria and equivalency.

SSC's retail Members do not seem to be using the 'sustainably sourced' claim even if a large proportion of sales meet the SSC criteria for labelling it as sustainably sourced (some may use the responsible sourced claim or no claim). If the MSC logo is on pack then the MSC's claims relating to sustainable fisheries is used and 'independently certified as sustainable' is stated on the packet. This may be explained in instances where businesses prefer not to use the MSC logo due to contingency of sourcing in which case it can be easier for them not to have the artwork related to 'sustainability' when they have to change seafood sources due to supply issues. Perhaps a solution could be to talk with the MSC about how to apply the logo on pack with a program fee as they did in, for example, the USA.

4.3 Developing the SSC and the SSC Codes

- *Assess new developments since creation of the Codes*

A large proportion of Members use the SSC Codes as a basis for their risk assessments creating a level of consistency and clearer messaging in the UK sustainable seafood market. This highlights the value of

the Codes in setting that framework, as well as highlighting the importance of keeping the Codes updated in accordance with new learning. As one Member explained: *"The definitions of sustainable and responsible sourcing continue to develop".*

- *Inclusion of further benchmarks, definitions and processes in the codes*

Since the codes were created there has been the development of a large number of tools aimed at achieving similar objectives to the SSC. The following table collected tools that SSC members are using, but it is not clear how these map into the both the SSC Codes.

Table 2: Certification / Rating Tools used by members to meet the SSC Codes

Acronym	Definition
MCS	The Marine Conservation Society
SFP FishSource	Sustainable Fisheries Partnership
RASS	Risk Assessment for Sourcing Seafood
IFFO RS / Marin Trust	International Fishmeal and Fish Oil Organisation
WWF ratings	Worldwide Fund for Nature
Alaskan Seafood	Alaskan Seafood
Guidance / improvement	
GDST	The Global Dialogue on Seafood Traceability
GSSI	Global Sustainable Seafood Initiative
GGGI	Global Ghost Gear Initiative
ICES data	International Council for the Exploration of the Sea
ODP	Ocean Disclosure Project
SMETA	Sedex Members Ethical Trade Audit
SFP Metrics	Sedex Members Ethical Trade Audit
Fisheryprogress.org	FIP website

It could be helpful to be clear about whether newly developed standards would meet the 'sustainably sourced' criteria. For instance, on the wild-caught side, the Alaska Seafoods logo was used by at least one Member on their product but it is not currently clear whether this meets the Labelling Codes. Similarly, with farmed seafood some Members referred to Friend of the Sea as sufficient for the responsible labelling and others referred to Global G.A.P., GAA or ASC, as such it would be helpful to provide clarification on what is considered as 'good' aquaculture standards which meet the SSC Codes.

One of the tools mentioned above is the Global Sustainable Seafood Initiative benchmark (GSSI) which as benchmarked different environmental certification programmes. There has been a discussion of GSSI within the SSC and the meeting notes are available here. It was agreed that the SSC set up a working group to discuss the exact phrasing to be used, but any GSSI mention should be a suggestion and not a requirement. E.g. "*certification schemes such as those recognised by the GSSI Benchmarking Tool*." The SSC does not specifically endorse one particular tool, however further clarification would be beneficial on this point.

The definition for Fisheries Improvement Projects (FIPs) has also been further clarified since the development of the Codes. The SSC might consider defining FIPs as those reported on FisheryProgress.org or recognised by Sustainable Fisheries Partnership or WWF; and how to define an 'active' or 'credible' FIP. Another example is when Members state 'sourcing from a FIP' as enough to meet the SSC codes, when sourcing from a FIP there are a number of aspects which should be monitored and proof of engagement should be included to show they are meeting the SSC Codes.

The Ocean Disclosure Project (ODP), which is being used by several Members, has been launched since the release of the Codes. The SSC might discuss its role in the Codes as a recommendation in part of the sourcing policy, risk assessment process as well as the traceability and transparency requirements.

- *Consider additional issues that are of importance to members*

"*Should SSC codes cover Human rights?*"

New issues are being considered important by Members such as social compliance and labour issues. This has been covered in different ways by Members for instance via their Modern Slavery statements or social audits. While there are few on-product social claims there are claims made off-product on the Member website for instance around ethical sourcing or labour conditions.

The Codes currently include the following statement and it may be important to review it on a regular basis, particularly as it pertains to sourcing, given the level of action and focus on this area of seafood sustainability:

- *SSC Members recognise that social responsibility is another critical pillar of sustainability in the global seafood supply chain.*
- *Members comply with the Modern Slavery Act 2015 where applicable.*
- *Members have policies that consider social and ethical challenges in seafood sourcing in their supply chains.*

In the words of one SSC Member the role of SSC could evolve to incorporate more specific requirements of its Members on human rights in the fisheries they source from.

"*While the SSC is unlikely to major on human rights and there are other industry bodies already engaging in this space it would be good for the SSC to move forward and consider incorporating more specific requirements of its members on human rights in the fisheries they source from - this will become more important and will enable the SSC codes to remain relevant.*"

This poses the question on whether the SSC should discuss how and when to include social issues and labour rights as part of the a) the risk assessment and b) sourcing policy, and for labelling/claims in the future. For instance within the risk assessment process, high-risk could also consider risk of IUU and risk of poor labour practices.

There have also been developments in organic certification and standards of seafood since the Codes were published. Some SSC members are using these environmental claims and it is not clear how they relate to the Codes. For instance should a product certified as 'organic' be able to claim that it is 'sustainable'?

- *Review approach to other environmental claims*

Further guidance could be developed through the SSC on how to approach other seafood sourcing claims made, for instance around FAD-free, Dolphin safe (also mentioned in the 2017 report) and 'Environmentally friendly' / 'Minimal environmental impact'. Where these are in line with the Codes it may be appropriate to discuss including them in the risk-assessment process or alternatively provide guidance to their interpretation and quality. Providing greater clarity about these different claims may help to avoid confusion and maintain consistency in application of the Codes.

- *Consider further guidance on the scope of the codes*

The scope of seafood products or seafood associated products that Members assess against the Codes appears to differ between members. To increase the impact of the SSC Codes of Conduct the coalition may want to re-consider including pet food, nutritional supplements and flavourings. It may be necessary to provide guidance on how to implement this with the broader scope developed over time.

In addition to scope of products, it was found that there are Members who may/may not apply the Codes to other parts of their organisations such as subsidiaries, parent companies, international operations, events and contracted food service. It may be helpful to include guidance on the expectations for parts of the organisations beyond the core Members.

Marine feed ingredient sources are another area that needs discussion related to scope. In the Code it says that Members must include: *"an 'assessment' of: marine feed ingredient sources"* but it is not clear on whether this is a risk-assessment and whether there are certain standards for marine feed that have to be reached.

Furthermore, the guidelines contradict themselves by on one hand saying, *"Members do not need to conduct an audit on marine ingredients directly",* but on the other hand saying marine ingredients in aquaculture feed must be both risk-assessed and either responsible or sustainable :

"*Members' risk assessments should consider the marine based ingredient sources of the fish feed and ensure that:*

• *There are feed manufacturing controls and traceability in place;*

• *The marine ingredients are sourced from fisheries that are certified to a responsibility or a sustainability standard, or come from responsibly sourced fisheries, where practical; and*

• *A risk assessment of the marine feed ingredient sources has been carried out to identify where there is a need for fishery improvements. This should guide members' own engagement plans."*

The recommendations in the Code and the Guidance are therefore not clear on the expectations around marine ingredients in feed. Given this lack of clarity and openness to interpretation, it may be that Members are not including marine ingredients in risk assessments is in line with SSC risk assessment. This is an issue that would benefit from further scrutiny by the SSC.

- *Extend SSC Codes consistently to communication channels*

The SSC website feels dated and doesn't clearly present the SSC as a B2B solution nor a key public communication tool. The website needs updating to clearly state information in relation to the Codes and their implementation. There is also limited information regarding the Codes themselves and could be improved in order to appeal to potential future members. One SSC Member explained:

"The SSC website is not user-friendly in terms of the codes, and finding the guidance document online is near impossible. Lots of changes (e.g. exclusion of pet food) are recorded in the minutes but it would be helpful if these were summarised on a webpage too."

A social media presence for updates, guidance and reminders could increase SSC outreach and influence, targeting communications where specific messaging or advocacy is needed. This could also support Members' activity, highlighting Member news of relevance. Regular communications and news

could increase knowledge of the Codes, together with expectation and understanding of how the SSC can help Members' sustainable seafood commitments. Social media was used in support of the SSC's advocacy for the Fisheries Bill, which is an example of how social media can be used for collaborative influence.

- *Support more tools, improvements, communications*

Some of the Member websites and communication materials checked were found to be out-dated giving information not fully aligned with the Codes. In some cases there was inconsistency between the information provided to the researchers and members' websites or social media channels. Support in how to communicate about the Codes could now be developed.

Guidance might be considered as to how to manage consistent communications across different channels including how to communicate internally and train personnel across different departments such as buying, marketing and brand development. The Labelling Code already mentions websites, but could also be updated to include social-media channels.

The opportunity to update and enliven the SSC online presence could be dovetailed with guidance to members such that communications across the Codes activity becomes cohesive and ramps up public understanding of claims made on pack and in communications online. Details of members' actions to develop the UK sustainable seafood market could be enhanced, for example, giving details of fisheries improvement projects.

Where the current SSC Sourcing Code lays out some expectations for improvements and engagement actions this could be enhanced with guidance on how members can strengthen their efforts and have more impact. This could include explaining how members should be involved in FIPs, what constitutes a FIP that is working and what evidence is needed from the FIP that it is being sourced from. The SSC could be a means of facilitating improvement work and coalescing members to support it. There was some interest in SSC being a vessel for advocacy and supporting improvements where public FIPs are not appropriate. One Member stated that:

"*I feel the focus should be on non-certified sources. So much analysis has already gone into MSC/ASC sources but it's unclear to me how you would risk-assess a non-certified/non-FIP source as I have not had to do this before. This would be useful information for all the industry especially those not involved in SSC.*"

4.4   Conclusion

In summary, the SSC Codes are being in general well adhered to by members and have increased the supply of seafood into the UK that is sustainable and responsible and correctly labelled as such. There has also been value in the SSC Codes through more engagement with improvements in fisheries and advocacy on behalf of members. However, there are some issues that need clarification and a review conducted based on development of other standards and dialogues since creation of the Codes.

To further improve consistency and impact and to update the program to account for developments in seafood sustainability and relevance of the SSC Codes, the conclusions and recommendations from this 2020 implementation report are summarised below:

1. Enhance membership and stakeholder understanding of the Codes by quantitively measuring their impact via a specific study led by a working group;

2. Review the scope of the Codes (i.e. own-brand only; pet food; flavourings) as well as scope beyond own-brand and application to producer groups; and ensure this is reflected in the Codes text and accompanying Guidance;

3. Review the intent around assessing marine ingredients in aquaculture feed, update the Codes and guidance where necessary and harmonise the application among Members;

4. Assess new developments since the creation of the Codes and consider inclusion of relevant and updated benchmarks, definitions and processes;

5. Discuss and review the application of the sustainability and responsibility claims (along with their interaction with logos), how aquaculture may be claimed to be 'sustainably sourced' and update Code and Guidelines if needed;

6. Review additional environmental labelling claims that are commonly used and provide additional guidance particularly on canned tuna;

7. Consider whether human rights and IUU fishing should be included within the risk-assessment process outlined in the Sourcing Code, and what claims can be made on labelling;

8. Strengthening SSC cooperation around engagement in improvements for both fisheries and farm areas. This should also include guidance around how to engage, examples of what is considered as sufficient engagement and also what is good practice about demonstrating sourcing from improvement projects;

9. Update the SSC website and strengthen the social-media presence to enhance understanding and assist in Member's advocacy efforts to improve sustainability of fisheries and farms;

10. Provide additional guidance on how the Labelling Code can effectively be applied to Members' websites and social-media platforms, and update the Labelling Code to include social-media.

Appendix A: Data Request 1

We are Charmelian, the consultancy team carrying out the SSC 2020 Implementation Report, made up of Charlotte Tindall, Melanie Siggs and Iain Pollard, Lia Hayman from Key Traceability Ltd. There will be an opportunity for members to review the draft report and submit comments.

We have created our first round of data collection, this first round includes the bulk of the data points we require to carry out the report, with clarification and further questions to be included in the second round of data collection and the individual interviews. The first round of data will help to identify priority species for sampling, gather relevant policies and procedures relating to the implementation of the SSC Codes. We would like to receive responses to the questions plus the completed spreadsheet. For the spreadsheet please follow the example row included in the table and then answer the questions below.

The data provided will be used to assess the effectiveness of the SSC codes and to assess member compliance. Please be assured that all data collected as part of this report is confidential and members shall not be named in the report. If you would like to have an NDA in place, then Key Traceability Ltd. will set that up. In either case the responses that you provide will be kept confidentially and only used to produce the implementation report.

Once we have analysed the first set of data we will be in touch with interview and/or further data requests and clarifications as required.

Please complete this questionnaire (in the grey boxes) based on data for the most recent year of data availability, for instance the calendar year 2019 would be perfectly acceptable. Please note the period for which you are providing the information.
Scope: All seafood included in the SSC commitment

Member name:	
Member communications:	*e.g. link to company website and social media pages*
Annual sampling period:	*e.g. Jan-Dec 2019*

Questionnaire	
1	**Please describe the policies for seafood sourcing and labelling/claims for your organisation, specifically relating to meeting the SSC Codes, what they include and when they are reviewed. If any policies/procedures related to your SSC commitment (e.g. sourcing policy) are publicly available please provide the link to their location online or send us a copy/copies of the document(s).**
2	**What processes do you have in place to ensure all species and products are in line with the labelling code? Please explain the sign-off process for packaging, signage, social media posts, website posts or other communications regarding seafood.**
3	**What do you consider to be included in the scope of the SSC commitments for your organisation? How do you define what is 'out of scope'?**

4	**What proportion of total seafood sales volume for your organisation do you estimate is included in the SSC Scope?**	
5	**Please describe your risk assessment procedure for sourcing products. Which food/product categories are included within the risk-assessment?**	
6	**Please describe how you check that your source fisheries and aquaculture have been evaluated and follow-ups are made according to the code.**	
7	**Please describe your system of traceability, what is possible and not possible to trace back to origin and how this is verified.**	
8	**Do you have any feedback about the SSC that you would consider relevant for the review? Please provide as many details as possible and if it is preferred contact the consultant to explain over the phone.**	

Please list all the species groups sourced for a recent annual period (for example Jan-Dec 2019). The intention is to get an overview of the member profile and to direct where samples will be taken from during the second stage of data analysis. The team will choose samples for checking application of the code based on the information provided plus a review of publicly available information.

Or if you participate in a transparency project e.g. Ocean Disclosure then no need to complete the table, please provide the link to your page which will be used instead:	

Species / Group	Wild / Farmed	Number of sources	Source Countries	No. engagement actions undertaken (fisheries) / No. Corrective action plans agreed (farms)	No. Certified	If Wild: 'High risk' If Aquaculture: 'Non-compliance'	Med risk	If Wild: 'Low risk' If Aquaculture: 'Compliant'	Any instances of 'did not source' due to SSC Codes? Y/N
Example: tuna	Example: wild	Example: 2 fisheries	Example: Maldives and Seychelles	Example: 1	Example: 1	*Example: None	Example: Yes	Example: Yes	Example: No

* Reference decision trees on pages 10-13 of the Code

Appendix B: Data Request 2

SSC second round data request

Since the first round of data collection team Charmelian have reviewed the responses and analysed the information provided against the SSC Codes. This has led to the second round of data collection.

The purpose of this second round of data collection is to clarify or expand some information given in the spreadsheet 'SSC Data Request – 1st Round Data collection". Further, the second round of data is to understand in further detail how the SSC codes are being implemented in practice for given examples taken from the data supplied.

Moreover, to this, we wish to delve deeper into sourcing of specific lines to demonstrate the application and utilisation of the SSC policy in practice. This is kindly requested in the latter part of this document "Case study of seafood sourcing for five lines".

All data will be held confidentially.

Member name: XXX

Section 1: Follow up clarifications to first round data request:

1. **Q.**
   A.

Section 2: Case study of seafood sourcing for five species:

This section is to provide a sample of species to show the SSC sourcing codes applied in practice. Below, can you please provide the sourcing tree and relevant information as to how the SSC codes have been utilised while sourcing these products (if relevant, indicate how the sourcing tree differs to that of the SSC codes pages 10-12-and if possible, why it differs). This includes:

- The risk assessment
- Actions taken where needed as determined by the risk assessment
- Documented engagement plan in place and monitored
- Traceability assurance
- Certification
- Final product showing labelling
- Any other communication materials produced on the product e.g. online marketing

Noting, it would be appreciated if the example could include where the sourcing code has been used in an instance that resulted in not-sourcing of the product. For the sake of a baseline, two out of the five species are to be 1. Farmed shrimp and 2. Tuna. If you do not currently source either of these, then please disregard them in this section.

1. **Species 1 – Farmed Shrimp**
2. **Species 2 – Tuna**
3. **Species 3 – Ideally one high risk, one medium, one low**
4. **Species 4 – Ideally one high risk, one medium, one low**
5. **Species 5 – Ideally one high risk, one medium, one low**

Appendix C: Checklists

Table 3: Sourcing Code Checklist from 2017 report

Type of Claim	Checklist to assess alignment with Sourcing Code (SC)
Sourcing Policy	✓ availability of the sourcing policy (on request, or publicly online); ✓ aspects of policy coverage over wild-caught and farmed species
Risk assessment processes	✓ use of risk assessments to determine the status of the fisheries or aquaculture sources; and ✓ frequency of assessments and sources of information used, and management of the sourcing system (internal or external).
a) wild capture fisheries	Audits and assessments include (at a minimum), a review of ✓ legality of fishing operations; ✓ biological status; ✓ fishery management practices and implementation; and ✓ wider environmental impacts.
b) Farmed fish products	The risk assessment used must include an assessment of: ✓ legality; ✓ farm site management practices; ✓ wider environmental impacts of farming; and ✓ marine feed ingredient sources.
Risk outcomes	✓ use of assessments to identify a risk outcome; ✓ internal or independent audits conducted; and ✓ the scoring or rating system used.
Appropriate responses	✓ where Members are sourcing medium or high risk products, if appropriate improvement/engagement plans are in place and monitored; ✓ risk mitigation results in reduced risk rating and continued sourcing; and ✓ risk mitigation does not result in reduced risk, resulting in decision to stop sourcing.
Traceability:	✓ measures are in place to trace fish from the source fishery to the point of sale; ✓ traceback exercises conducted to verify traceability systems are in place; ✓ evidence of traceback provided (e.g. intake records, catch certificates…).

Table 4: Criteria checklist for SSC sustainability and responsibility claims

Type of Claim	Checklist to assess alignment
Sustainability (wild-caught only)	✓ Terms and language used in the claim are consistent with the Labelling Code (as outlined in Section 3.3.1 of this report). ✓ Product is certified to a third-party standard (OR an independent third party has confirmed that sustainability criteria have been met) ✓ Certification is verified (or supported by documents/records).
Responsibility (wild-caught)	✓ Terms and language used in the claim are consistent with the Labelling Code (as outlined in Section 3.3.1 of this report). ✓ Product meets the requirements for sustainability (OR risk assessment confirms that the product is from a low-risk fishery) ✓ Where fishery is medium-high risk, actions are taken to reduce the risk rating and meet further criteria as outlined in the Sourcing Code.
Responsibility (farmed fish)	✓ Terms and language used in the claim are consistent with the Labelling Code (as outlined in Section 3.3.1 of this report). ✓ Product is certified to a third-party responsibility standard (OR audited to a good aquaculture standard/code of practice)

✓ Product meets conditions outlined in the Sourcing Code.

Table 5: Sustainability claims

For wild-capture fish only:	
Source fishery is consistent with the principles of relevant key international standards and codes of conduct.	
There is an independently audited chain of custody in place to trace the fish back to source fishery.	
To demonstrate these criteria have been met:	
• **Independent third-party has confirmed sustainability criteria are in place**	• Product is certified to a third-party sustainability standard.

Table 6: Responsibility claims

	For farmed fish	**For wild-caught fish:**
Option 1	• Product is certified to a third-party responsibility standard • AND meets additional criteria under the Sourcing Code.	• Product meets the conditions for sustainability (responsibility or sustainability claim can be made).
Option 2	• Product is audited against a good aquaculture standard/code of practice • AND meets additional criteria under the Sourcing Code.	• Product is sourced from a low-risk fishery based on the outcome from the risk assessment.
Option 3		• If product is sourced from a fishery where medium or high risks are identified, additional criteria relating to risk reduction and improvement are required.