April 2017

SUSTAINABLE SEAFOOD COALITION REPORT

Assessment of SSC Labelling and Sourcing Codes

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SSC Implementation Report

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1 EXECUTIVE SUMMARY

To mark the two-year anniversary of the SSC Codes of Conduct on Environmental Claims and Environmentally Responsible Fish and Seafood Sourcing, ClientEarth initiated an independent, third-party assessment of their implementation by SSC Members operating as seafood businesses. This report is the outcome of that assessment.

Key findings

Self-declared environmental claims were found on 52 of the products—with 43 meeting the requirements under the Labelling Code. Of the nine products that were not aligned with the Labelling Code, three did not meet the minimum requirements due to lack of available information and/or ability to verify claims, five did not use the correct terminology as set out in the Labelling Code, and one product used a sustainability claim without the required third-party chain of custody. In total, SSC Member products accounted for three of the claims not aligned with the SSC Labelling Code– two cases related to the same label and one case could not be verified. Six were on non-Member products. The study therefore found 17% of claims to be potentially misleading or unverified, compared to 32% at the time of ClientEarth's Labelling Report in 2011 – a 15% improvement.

Of all 80 products sourced, 71 (89%) were sourced in alignment with the SSC Sourcing Code. The nine products that did not meet the requirements consisted of seven non-Member and two SSC member products. In all cases, further information was required to assess and/or verify risk associated with source fishery or farm. Verifying Information on farming systems and the accreditations associated with the product's source farm was particularly challenging, with only general details available publicly.

Key Recommendations

- Better on-pack consumer information – To help consumers make more informed decisions, information such as catch area (to appropriate level) and catch method should be provided on-pack to allow consumers use seafood guides.
- Extension of sustainability information to online sites – Where possible, sustainability/responsible sourcing information should extend to online retail sites to improve continuity and increase consumer awareness.
- Better consumer contact information to facilitate inquiries – Consumer contact information was not always accessible and/or easy to find on pack. Ideally, an email address and careline should be provided along with clear references to information needed to make the inquiries. Where space is limited, the website address provided should be direct to the inquiry page (or to the seafood sustainability site).
- Greater transparency in responsible sourcing policies/practices – To clearly demonstrate and provide evidence about the commitment to Responsible Sourcing/Sustainability, up-to-date and comprehensive information on policies, practices and/or any other initiatives should be available online.

2 INTRODUCTION

In a 2010 report titled “Environmental Claims on Supermarket Seafood", the non-profit, environmental law organisation ClientEarth criticised seafood brands and retailers for making misleading claims on fish products found in major UK supermarkets. Out of 100 fish products reviewed by ClientEarth, 32 carried claims that were found to be potentially misleading or unverified.[1] The report identified seven broad categories of claims on retail fish products: Sustainably Sourced; Dolphin Safe / Friendly; Responsibly Farmed / From Well-Managed Farms; Sourced from a Responsibly or Well-Managed Fishery; Responsibly Sourced; Environmentally Friendly Farms; and Protects the Marine Environment.

2.1 SUSTAINABLE SEAFOOD COALITION (SSC)

After the release of ClientEarth’s 2010 report, several leading UK retailers and seafood brands met with the NGO to discuss the problems identified. The group continued to meet and discuss how best to address the issues raised. By May 2011, armed with a vision that all fish and seafood sold in the UK be from sustainable sources, the group formed the Sustainable Seafood Coalition (SSC)[2] with ClientEarth acting as secretariat. Although the group planned to address broader issues of seafood sustainability, it was clear that the first priority was to resolve the problems associated with environmental claims on packaging and to establish a more consistent, harmonised approach that would be followed by all Members. In order to do so, minimum criteria underpinning the claims needed to be agreed upon, along with general principles of good practice and the processes required for responsible sourcing decisions.

The SSC’s efforts ultimately resulted in the development of two voluntary codes launched in September 2014. [3] These were the Voluntary Code of Conduct on Environmental Claims (the ‘Labelling Code’)[4] and the Voluntary Code of Conduct on Environmentally Responsible Fish and Seafood Sourcing (the ‘Sourcing Code’),[5] both of which relate to environmental aspects of sustainability only. [6] SSC Members are expected to implement and adhere to these codes for all own-brand fish and seafood as a condition of membership.

To mark the two-year anniversary of the SSC Codes, ClientEarth initiated an independent, third-party assessment of the implementation of the Labelling and Sourcing Codes by all SSC Members operating as seafood businesses. This report is the outcome of that assessment.

[1] The analysis was primarily focused on products from the supermarkets own brand but also included 11 products from other seafood brands.
[2] More information on the SSC is available on http://www.sustainableseafoodcoalition.org.
[3] The SSC Labelling and Sourcing Codes were launched at the Humber Seafood Summit on 18 September, 2014.
[4] SSC Labelling Code - http://www.sustainableseafoodcoalition.org/labelling-code/
[5] SSC Sourcing Code - http://www.sustainableseafoodcoalition.org/sourcing-code/
[6] The SSC Codes do not yet cover criteria relating to social sustainability because at the time of development, sufficient information was not available to fully understand and address all social issues. Therefore, it was agreed to review social standards once the environmental codes were completed. The SSC is now working on addressing these issues: http://www.sustainableseafoodcoalition.org/documents/10-august-2016.pdfhttp://www.sustainableseafoodcoalition.org/documents/10-august-2016.pdf

3 SSC LABELLING AND SOURCING CODES: IMPLEMENTATION ASSESSMENT

This review was commissioned by ClientEarth in order to assess the degree to which SSC Members are implementing the SSC Labelling and Sourcing Codes as well as to compare general findings of environmental labelling claims in the broader UK market to those found in the 2010 report. Of the 24 SSC Members at the time of the assessment[7], only fish and seafood business members (herein referred to as 'SSC Members') were assessed as they are the only members able to actively implement and adhere to the criteria set out in the SSC Codes. While SSC Members are expected to adhere to agreed minimum standards within the first year of Membership, full implementation of the codes across all products and species may take longer depending on the size of business, existing stock and other relevant considerations. Where SSC Codes are not yet fully implemented, it is recommended that Members have a plan in place with timelines and objectives for delivery, and discuss any changes with the secretariat as needed.

The assessment consisted of two parts:

I) **Labelling Review –** An assessment of all environmental claims on fish and seafood product labels for own-brand products. Any directly related claims as communicated on point of sale materials and other public facing communications (such as corporate websites), but which were not specific to own-brand products, were reviewed for information only.

II) **Sourcing Review** – Assessment of sourcing policies, risk assessment processes and subsequent sourcing decisions with appropriate responses (including any improvement actions/plans to reduce risk) for own-brand products.

3.1 UK BUSINESSES UNDER REVIEW

SSC Members

Current SSC membership is made up of four different types (or categories) of business from across the seafood sector, namely: UK retailers, brands and processors, suppliers to the seafood industry, and foodservice. By name, and at the time of the assessment, these SSC members were: Birds Eye UK, The Co-operative, Direct Seafoods, Fuller's, Harbour Lights, Joseph Robertson (Aberdeen), Le Lien, Lovering Foods, Lyons Seafoods, Marks & Spencer, MCB Seafoods Ltd., Morrisons, New England Seafood Ltd., Sainsbury's, The Saucy Fish Co./ Icelandic Group UK, Tesco, Waitrose, Whitby Seafoods, Young's Seafood Ltd.

Non-Members

To understand whether the SSC Codes had a wider impact on the market, five other seafood businesses in the UK were also included in the review: three brands and two retailers. Information used in the assessments was limited to publicly available resources and any other materials obtained through inquiries to customer service departments or similar.

[7] At the time of the assessment, the SSC consisted of: 19 seafood businesses, 4 representative organisations and the secretariat, ClientEarth. The current list of members is available at: http://www.sustainableseafoodcoalition.org/members/

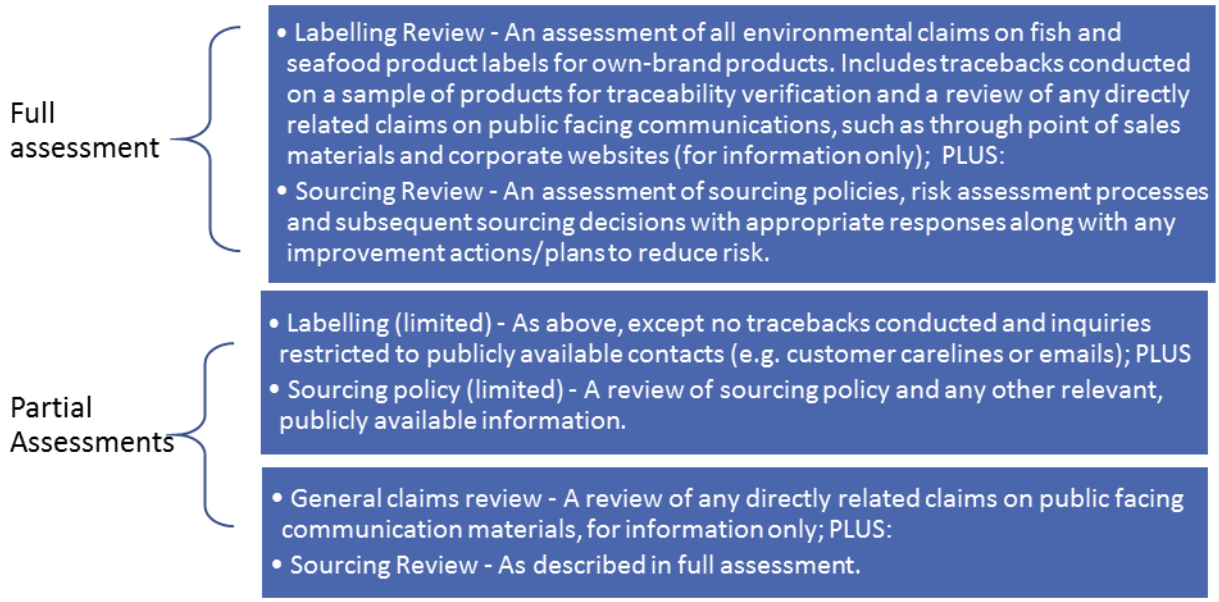

Figure 1: Types of Assessments – Full and Partial

Categories of Businesses Assessed:

The four different types of seafood businesses included in the assessment consisted of the following:

i) **Retailers** – There are eight businesses in this category (six SSC Members and two non-Members) that sell both their own-brand products and other branded goods directly to consumers. Full assessments (full labelling and full sourcing) were conducted on the six SSC Members and Partial assessments (limited labelling review, sourcing policy only) on the two non-Members.

ii) **Brands & Processors** – There are 11 businesses in this category (six SSC Members and three non-Members) that sell their own-branded products through retailers and/or manufacture products for retailers under the retailers' own-brand label. Full assessments were conducted on the six SSC Members. The three non-Members were subject to partial assessments only. One had a labelling review (limited) plus a sourcing review. The other two non-Members were partially assessed on one species, as only one product was purchased.

iii) **Suppliers to food service** - There are three businesses in this category (all SSC Members) that sell fish directly to other businesses although only two Members were included in the review[8]. These businesses do not produce any labelled fish and seafood products, so only partial assessments were conducted which consisted of a limited labelling review (based on general claims[9] on corporate websites (for information only)) and a full sourcing review.

iv) **Food Service** – There are two Members in this category – restaurants and fish friers who sell prepared fish directly to consumers. When defining the scope of the report ClientEarth did not include foodservice businesses, which would have required a different methodology. This

[8] One SSC Member was unable to participate in the study due to extenuating circumstances.

[9] 'General claims' are hereby defined as claims not restricted to the fish or seafood product contained in a specific product (e.g. all fish of a given species, as opposed to fish from a specific farm, region or fishery).

decision was revised at a later stage, after identifying a suitable approach, and foodservice members were invited to participate if they wished to do so. The members in this category were not able to participate in the proposed timeframe. Therefore, this category was not included in the assessment.

3.2 SPECIES AND PRODUCTS UNDER REVIEW

3.2.1 Species

A range of eight different fish and seafood species - tuna, cod, sea bass, cold water prawns, warm water prawns, scampi and salmon – were initially selected to assess SSC code implementation. The species were chosen using the following criteria[10]:

- Commonly consumed in the UK: among the top 20 fish and seafood species (as ranked by value and volume); [11]
- A mix of wild caught and farmed species;
- At least one species from each category of white fish, oily fish, flatfish and crustacean (following guidance from ClientEarth); and
- Rated moderate to high risk, according to the Marine Conservation Society (MCS) Good Fish Guide or Seafish's Risk Assessment for Sourcing Standard (RASS) tool.[12]

The selection was biased towards moderate to high risk ratings to allow for a review of risk mitigation actions taking place to manage/improve the fishery and reduce the risk rating (as part of the Sourcing review). The MCS Guide was the principle source used to identify risk levels and chosen specifically for its accessibility to the average consumer (and non-fisheries expert), providing a relatively quick and easy way to help make more informed decisions. The MCS uses a rating system from 1 to 5, with low risk ratings of 1 & 2 (green rated) used for well-managed, sustainably fished stocks that have a lower impact on the environment up to a risk rating of 5 (red rated) for unsustainable, overfished or poorly managed systems. **See Annex A** for further detail on the MCS ratings guide.

Where stock coverage was insufficient or more detailed information was required on the fishery and possible risks associated, RASS was used as another source of information. Unlike the MCS, RASS does not provide an overall score but instead scores each of the four main categories – stock status, management, habitat and bycatch – individually from 1 to 5, enabling users to prioritise different areas of risk. In a few cases where neither MCS nor RASS covered the species or fishery under review, the Sustainable Fishery Partnership's Fishsource profiles were used as a source of information.

[10] Due to product availability in store at the time of purchase, a wider range of species was sampled, increasing the total number of fish and seafood species reviewed to 15.
[11] The Species identified from a Seafish market summary report: Top 35 Species by Value and Volume http://www.seafish.org/research-economics/market-insight/market-summary. Selection included 4 of the Big 5 – top 5 species consumed in the UK, accounting of upwards of 80% of all consumed.
[12] The MCS GoodFishGuide (www.goodfishguide.org) and RASS tool (www.seafish.org/rass/)

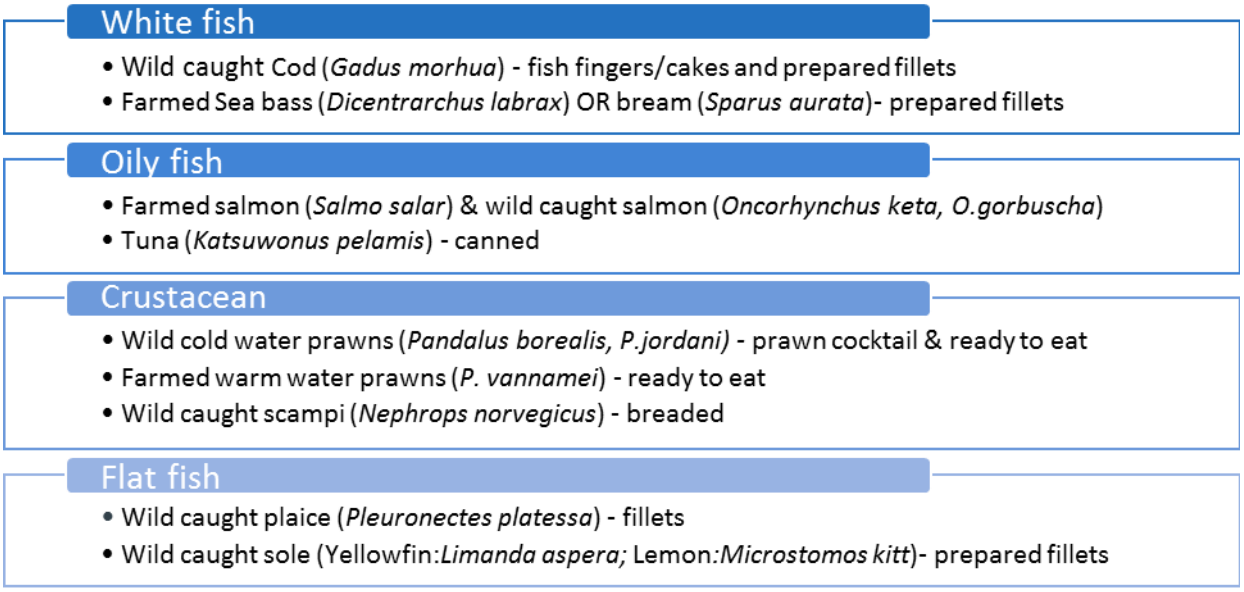

Figure 2: Fish species and products selected for assessment (by species category, common (and scientific name) and product)

Additional species

After the initial selection of eight species, a further six species were added to the list to increase the sample size and be more representative of some suppliers and food service. One additional species – squid – was added to the list under Other Products in Table 9 (section 3.9), to increase representation of products reviewed for two brands with smaller own-brand ranges.

3.2.2 Product Selection

To conduct the assessment, products were purchased from eight retailers and one online retailer. At SSC Member stores, photos were taken of point of sale materials relating to fish and seafood products and included posters above display units and fish counters, and signs on chill cabinets.[13]

Where possible, similar types of products were purchased for each species and were selected on the basis of the following characteristics:

- Popular products/types such as canned tuna, cod fish fingers/fillets, breaded scampi, etc.
- Product categories – all categories from ready-to-eat to frozen.
- Basic or value option, where possible

If products containing the selected species were not available at the time of the store visit, a similar species was purchased. These substitutions included the following:

- sea bream where sea bass was not available.
- lemon sole or yellowfin sole, where plaice was not available.
- salmon - mixture of farmed and wild-caught species.

[13] For SSC-Member retailers, advance notice was provided to store managers via member contacts to inform on date/approximate time of visit and that consultant would be taking photos in-store.

3.3 SSC Labelling Code Assessment - Scope and Methodology

By signing up to the Labelling Code, SSC Members commit to using only two categories of voluntary environmental claims on own-brand products—claims regarding sustainability and responsibility—and to making such claims only if fish are derived from fisheries or farms that meet the minimum criteria and have sufficient documentation available to support the claims. The requirements apply to own-brand product labels and any other corporate media/materials used to make claims such as corporate websites (online grocery sites) and point of sale information (including billboards and posters used in store displays, at fish counters, etc) applicable to own-brand products.

3.3.1 SSC Labelling Code: Acceptable claims and Minimum criteria

The Labelling Code sets out the following acceptable claims:

- The single terms 'sustainable' or 'responsible' may not be used in isolation. For example, 'responsibly farmed' or 'sustainably sourced' could be used;
- Any farmed products may not use the term 'sustainable' on the label;
- Any images used must reflect the claims or processes they are intended to depict;
- Sufficient assurance will be made available on request to support any claim; and
- Where possible, sufficient explanation of the claim will either be provided at the point of sale, or via a link to a website where an explanation can be found.

Table 1: 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 2: 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.

3.3.2 Methodology

a) Data collection

In total, 80 own-brand products containing 15 fish species were reviewed from 19 different businesses. Data collected for the review is compiled in Annex E, Tables 1 to 9. For all products, information on provenance and catch method (or production system) was collected from labels, including any environmental claims and associated responsibility/sustainability standards and use of third-party certification claims/logos. [14] However, more detailed information than was provided on-pack was often required to assess risk associated with the actual product purchased and/or to verify environmental claims. Where information was obtained via customer inquiries, i.e. from SSC-Member directly or via corporate websites, it is included (in italics) in the tables providing the full assessment data (Annex E).

Where claims of responsibility or sustainability are made, they are listed in the tables (see Annex E) under the heading 'Claims and Logos', along with any third-party certifications or own-brand responsibility standards. Additional certifications or standards that apply to the source fishery or farm, but are not listed on pack, are found under the heading 'Risk Assessment Considerations and Alignment with SSC Codes'.[15]

Claims used on public facing communications, such as through point of sales materials and corporate websites, are not necessarily applicable solely to own-brand products, and therefore go beyond the current scope of the SSC Labelling Code. As such, a review of claims beyond on-pack labels (referred to as 'other claims' in this report) was included for information only.

Table 3: Data collected from product labels by species. See Annex E, Tables 1 to 9.

Brand and Product	
SSC Member/non-Member reference	SSC Members A to O; Non-SSC Members 1 to 5
Species name where listed	Scientific name of species
Catch area and method (OR farm production area and method)	
• Catch/production area	• MCS or RASS rating associated with fishery
• Catch/production method • Product specific information not included on pack and obtained via inquiries to customer carelines, emails or websites	• specification or clarification of catch area (to sub-area level) • fishing method (where multiple options are listed or not provided);
Claims and logos (plus Contact information)	
• Any self-declared responsibility or sustainability claims as written on-pack	• Product specific claims • General claims in relation to sourcing
• Third party certification/standard	• Written claim associated with standard • Use of logo (and/or standard reference)

[14] Additional product information such as barcodes, datecodes, use-by or Best before end (BBE) date and other relevant information was recorded for all products but not included in the tables provided. Photos were also taken of all products purchased.

[15] A relatively small proportion of third-party certification standards and systems are consumer facing, with most communicated at the business level (from Business to Business).

• Customer contact information provided as a means to help consumers make informed decisions.	• Address, customer careline (or phone number), email address, website link.
Risk Assessment Considerations & Alignment with Labelling Code (LC) and Sourcing Code (SC)	
Risk mitigation or improvement actions in place to reduce risk	Information on any improvement actions or engagement plans in place, including engagement in a formal Fishery Improvement Project (FIP)
Verification of third-party certifications **I**nformation on any non-consumer facing third-party certifications (eg. GAA-BAP, GlobalGAP).	Certificate or product check through certification website, where possible[16] Review of corporate websites for
Traceback exercise (where conducted)	Verify traceability systems and product catch-area, method, certification

b) Analysis

Where self-declared environmental claims were found on product labels, the following checklist was used to assess alignment with the Labelling Code.

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.

Third party certifications – logos and associated claims

All third-party logos and associated claims were recorded for each product and where possible, the application of the logo was verified through the relevant standard's website. For example, for Marine

[16] For MSC – Products were checked via product finder (https://www.msc.org/where-to-buy/product-finder/product_search?country=GB).

Stewardship Council (MSC) certified products, it is possible to look up products in the sustainable seafood product finder by country and by brand/retailer.[17]

- ASC – Aquaculture Stewardship Council;
- FOS – Friend of the Sea;
- GAA-BAP – Global Aquaculture Alliance certification standards for Best Aquaculture Practice
- GlobalGAP – Aquaculture Standard (where GAP stands for Good Agricultural Practices);
- MSC – Marine Stewardship Council.

Other assurance systems

In addition to third-party standards, any logos or claims on pack relating to private label responsible sourcing standards or code of practice assurance systems was also recorded. Members G and J, for instance, have developed their own internal responsible assurance system, the logo for which is used on pack where appropriate. Please see section 3.3.3b below for further information.

3.3.3 Out of Scope

a) Compliance with Legal Obligations

Some products such as unprocessed fishery and aquaculture products and certain processed products (e.g. salted, smoked products, cooked shrimps in their shells) can be 'prepacked' or 'non-prepacked'. The EU Common Market Organisation (CMO) Regulation (Chapter IV) and the EU Food Information for Consumers (FIC) Regulation both require that certain information be provided on these products. Information such as commercial designation, scientific name, catch area etc. is a mandatory requirement under the EU Common Fisheries Policy (CFP) and the EU FIC Regulation.

As it is assumed that all packaging is in compliance with mandatory labelling requirements, the assessment did not extend to checking compliance with legal obligations. For more information on legal requirements, see **Annex B**.

b) Assessment of third-party certification standards and own-brand standard/assurance systems

No assessment was conducted on the credibility or integrity of the certification standards or assurance systems used by SSC Members or any other businesses. It is the responsibility of SSC Members to ensure they are meeting minimum requirements.

To review the SSC Guidance on third-party standards, see **Annex C**.

3.4 SSC Sourcing Code – Scope and Methodology

Under the Sourcing Code, SSC Members are committed to following good practice when sourcing fish and to using risk assessments purchased. Sourcing decisions must be based on the outcome of the risk assessments and, where applicable, whether appropriate actions have been taken to move the fishery towards sustainability.

Members commit to sourcing all own-brand fish and seafood in alignment with the Code within one year of signing up.

[17] From MSC website - https://www.msc.org/where-to-buy/product-finder

3.4.1 Minimum Sourcing Code criteria

Table 5: Five Principles of Good Practice

1) Traceability: putting sufficient measures in place to trace fish to their origin;
2) A risk assessment/audit: conducted and regularly reviewed;
3) Sourcing decisions: based on the outcome of the risk assessment or audit;
4) Appropriate responses: based on the outcome of the risk assessment or audit
5) Transparency: ongoing openness and sufficient communication.

3.4.2 Risk assessment outcomes

Members will either source from a third-party certified fishery (or farm), or use the risk assessment to identify fisheries as low, medium or high risk (Figure 3).

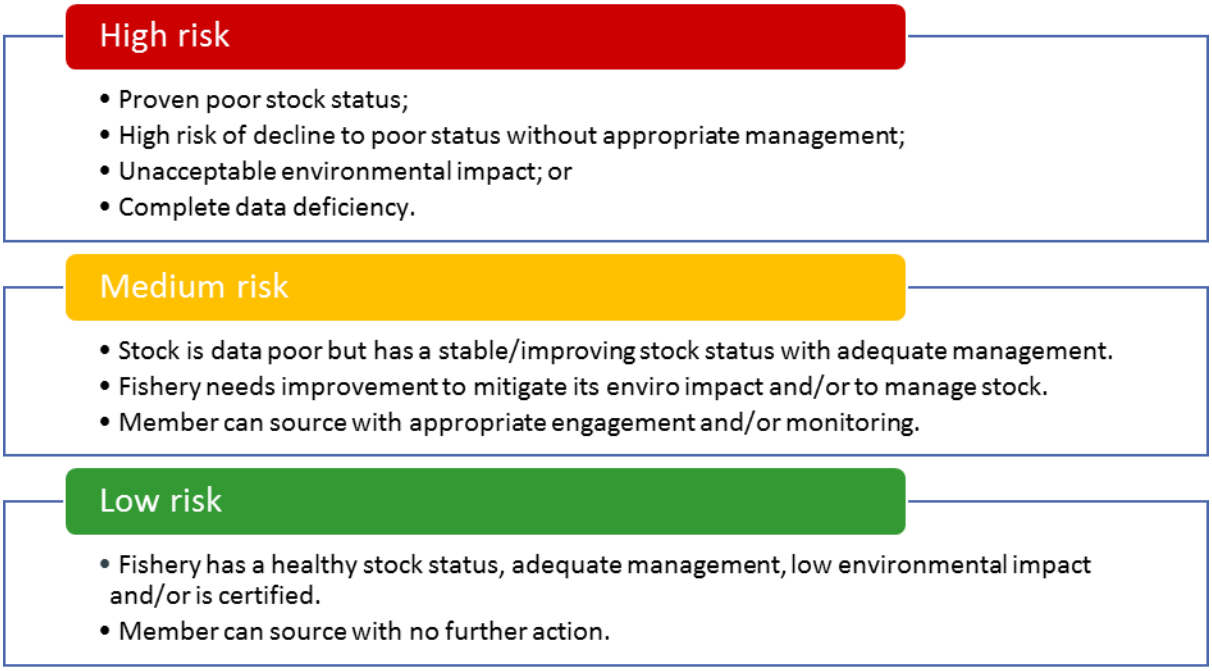

Figure 3: SSC Guidance on risk assessment outcomes.

3.4.3 Methodology

Phone interviews were conducted with each of the SSC Members to review sourcing and risk assessment procedures in place, and how the SSC Sourcing Code principles were being implemented across the business. A few species were used as case study examples to understand how sourcing systems were applied in practice.[18] Members provided detailed information on each of the species reviewed, from risk assessment through to risk outcome and the decision to source. If a species was identified as medium-high risk, specific information was provided regarding any improvement/ engagement plans in place to reduce risk (including monitoring and documentation to support). The

[18] The case study species selected varied by Member, but were selected where there was missing information or where there were medium to high sourcing risks.

review and verification of improvement actions outside of formal FIPs (with publicly available information) was outside the scope of this report.

A full sourcing assessment was not conducted for non-Members as there were no established technical contacts to provide information. Any inquiries went through customer service and information obtained was publicly available information on corporate websites. As non-Member businesses are, by definition, not bound by the commitments of the SSC Codes, the assessment of non-Member products against both SSC codes is included for comparative purposes and information only.

a) Data collection

Table 6: Checklist for Sourcing Code implementation

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…).

4 SPECIES-SPECIFIC ASSESSMENT SUMMARY

This section summarises the Labelling and Sourcing review, and assessment findings, by species. This intends to complement individual business assessments. Please see Annex D for a species risk profile, and Annex E for the full data set by product and species.

4.1 WILD-CAUGHT SKIPJACK TUNA

In total, nine canned tuna products – all containing Skipjack – were purchased for review. From these, four products used environmental claims, all of which were aligned with the Labelling Code. Eight out of nine products were aligned with the Sourcing Code.

Labelling assessment:

- Of the four products using environmental claims:
  - One used a sustainability claim (with MSC logo) and three used responsibility claims;
  - All were labelled in line with the Labelling Code.

Sourcing assessment:

- All four products bearing claims were sourced from low risk fisheries using pole and line, and are in alignment with the Sourcing Code.
- Of the five other products, four were sourced from low risk fisheries, and are in line with the Sourcing Code. For one product (from non-Member 2), information on source fishery could not be verified to provide sufficient assurance that product met minimum sourcing criteria and would therefore not be aligned with the Sourcing Code.[19]

4.1.1 Additional Claims – Dolphin Friendly and Dolphin Safe

Of the nine products, five had claims indicating the product was *Dolphin Friendly* or *Dolphin Safe*. The Earth Island Institute (EII) manages the Dolphin Safe label through an approval scheme intended to reduce the risk of dolphins caught as bycatch in tuna fisheries.

Although an assessment of this scheme and its application was outside the scope of this review, the relevance of this label on a product containing Skipjack tuna, a species that does not associate with dolphins in the same manner as other tuna species where bycatch is an issue (such as for some yellowfin tuna fisheries) is somewhat questionable.

4.2 WILD-CAUGHT ATLANTIC COD

In total, 12 cod products were purchased as fish fingers or prepared (dusted, battered or breaded) fillets. From these, 11 used environmental claims, 10 of which were aligned with the Labelling Code. All 12 products were aligned with the Sourcing Code.

Labelling assessment:

- Of the 11 products using environmental claims:

[19] Refer to Section 5.16 for more information.

    - Two used sustainability and nine used responsibility claims.
  - 10 were labelled in line with the Labelling Code. The sustainability claim on one product (from Member K) did not meet the terminology and language requirements set out in the Labelling Code.[20]

Sourcing assessment:

- 11 products were sourced from low-risk fisheries (MCS ratings 1 or 2) and one was sourced from a fishery in a formal FIP, in alignment with the Sourcing Code.

4.3 Wild-caught Flatfish – Plaice and sole

Three different species were included in this category to accommodate the variability of species available in-store on the day of purchase: plaice (*Pleuronectes platessa*) and two species of sole (lemon - *Microstomos kitt* and yellowfin - *Limanda aspera*). In total, seven flatfish products (five plaice and two sole) were purchased for review. From these, four products used environmental claims, all of which were aligned with the Labelling Code. All seven products were aligned with the Sourcing Code.

Labelling assessment:

- Of the four products using environmental claims:
  - All used responsibility claims, and were labelled in line with Labelling Code.

Sourcing assessment:

- Of the four products bearing claims, three products were sourced from fisheries in a formal FIP (part of Project UK) and one from a third-party certified fishery.
- The three other products were sourced from fisheries in a formal FIP. All products are in line with the Sourcing Code.

4.4 Wild-caught cold-water prawns

In total, eight products containing cold-water prawns (*Pandalus borealis* or *Pandalus jordani*) in the form of prawn cocktails or ready to eat prawns were purchased for review. From these, two products used environmental claims, both of which were aligned with the Labelling Code. All eight products sourced were aligned with the Sourcing Code.

Labelling assessment:

- Of the two products using environmental claims:
  - Two were responsibility claims, both of which were in line with the Labelling Code.

Sourcing assessment:

- Of the two products bearing claims, one was sourced from a third-party certified fishery and the other from a low/medium risk fishery, with appropriate mitigation measures in place to reduce risk.

[20] See Section 5.13 Member K (5.13.1 Labelling Review) for more information.

- Of the six other products, four were sourced from third-party certified fisheries, one was from a fishery in a FIP and one from a low risk fishery. All are in line with the Sourcing Code.

4.5 WILD-CAUGHT CRUSTACEANS - SCAMPI

In total, eight breaded scampi products were purchased for review, from fisheries that ranged from low to high-risk, most of which were moderate-high (MCS ratings 3 and 4). From these, two products used environmental claims, one of which was aligned with the Labelling Code. Seven out of eight products were aligned with the Sourcing Code.

Labelling assessment:

- Of the two products using environmental claims:
  - One used a responsibility claim, in alignment with the Labelling Code.
  - One used a general sustainability claim,(Member K), which did not meet the terminology and language requirements set out in Labelling Code.[21]

Sourcing assessment:

- Of the two products bearing claims, one was sourced from a lower risk areas using lowest risk methods (creel pots), where possible, the other was from a fishery with ongoing discussions to set up a FIP. Both were sourced in line with the Sourcing Code.
- Of the six other products, five were sourced from fisheries in discussion to set up a FIP. For one product (from non-Member 2), information on the source fishery (along with associated risks/improvement actions in place) could not be verified to provide sufficient assurance that product met minimum requirements, and would therefore not be aligned with the Sourcing Code.[22]

4.6 FARMED WARM-WATER PRAWNS – KING PRAWNS

In total, 13 products containing King prawns (*Penaeus vannamei)* in the form of raw, peeled prawns or flavoured ready to eat prawns, were purchased for review. All products had high-risk MCS ratings – a score issued due to critical concerns about impacts and traceability of marine feed ingredients. From these, 10 used environmental claims, seven of which were aligned with the Labelling Code. 10 out of 13 products were aligned with the Sourcing Code.

Labelling assessment:

- Of the 10 products using environmental claims:
  - All ten were responsibility claims, seven of which were in line with the Labelling Code.

[21] See Section 5.13 Member K (section 5.13.1 Labelling Review) for more information.
[22] See Section 5.8 NM2 (section 5.8.2 Sourcing information) for more information.

- For two products (from non-Member 1 and Member J), sufficient assurance that Labelling Code requirements for responsibility claims were met could not be obtained (as detailed in Sourcing assessment below). [23]
- The responsibility claim on one product (from non-Member 5) did not meet terminology and language requirements under the Labelling Code.[24]

Sourcing assessment:

- Of the 10 products bearing claims:
  - Seven were sourced from farms with one or more third party certifications and/or independently audited standards or codes of practice, and which include traceability/sourcing of marine feed ingredients. They were therefore sourced in alignment with the Sourcing Code.
  - For three products, information on production systems and associated independent certifications or standards could not be verified to provide sufficient assurance the product met minimum criteria under the Sourcing Code.
- The other three products were sourced from third-party certified farm systems, in alignment with the Sourcing Code.

4.7 FARMED FIN FISH – SEA BASS (OR SEA BREAM)

In total, nine products were purchased as fillets. Eight were farmed sea bass (*Dicentrarchus labrax*) but a substitute of Gilthead Sea Bream (*Sparus aurata*) was made for one product where it was not available in-store at the time of purchase. MCS ratings for both species are moderate (MCS rating of 3). From these nine products, eight products used environmental claims, six of which were aligned with the Labelling Code. Seven out of nine products were sourced in alignment with the Sourcing Code.

Labelling assessment:

- Of the eight products using environmental claims:
  - All eight used responsibility claims, six of which were in line with the Labelling Code.
  - For two products (from non-Member 1 and non-Member 5), sufficient assurance that Labelling Code requirements for responsibility claims were met could not be obtained (as detailed in Sourcing assessment below) [25].

Sourcing assessment:

- Of the eight products bearing claims:
  - Six were sourced from farms third-party certified (or audited) to at least one standard and were therefore sourced in alignment with the Sourcing Code.
  - For two products (from non-Members 1 and 5), information on production systems and associated independent certifications or standards could not be

[23] Refer to Section 5.7 for NM1 and 5.12 for Member J (Labelling and Sourcing Review) for more information.
[24] Refer to Section 5.17.1 NM5 Labelling Review for more information
[25] Refer to Section 5.7 NM1 and 5.17 NM5 (Labelling and Sourcing Review) for more information.

verified to provide sufficient assurance the product met minimum criteria under the Sourcing Code, and would therefore not be aligned.

- The remaining product was sourced from a farm with two independent certifications, in alignment with the Sourcing Code.

4.8 Farmed and Wild-caught Oily Fish – Salmon

A mix of farmed salmon (*Salmo salar*) and wild-caught salmon (*Oncorhynchus keta* and *Oncorhynchus gorbuscha*) was reviewed in order to include a broader range of companies in this category. In total, 12 salmon products (seven farmed, five wild) were purchased in the form of fishcakes and fillets. From these, ten products used environmental claims, nine of which were aligned with the Labelling Code. 11 out of 12 products were aligned with the Sourcing Code.

Labelling assessment (farmed):

- Of the six farmed salmon products using environmental claims:
  - All six used responsibility claims, five of which were aligned with the Labelling Code.
  - One product (from non-Member 5) was not labelled using appropriate responsibility/ sustainability terms, and would therefore not be aligned with the Labelling Code.[26]

Labelling assessment (wild):

- Of the four wild-caught salmon products using environmental claims:
  - Four used responsibility claims, all of which were in line with Labelling Code.

Sourcing assessment (farmed):

- Of the six products bearing claims, all were sourced from farms third-party certified (or audited) to at least one standard, and were therefore sourced in alignment with the Sourcing Code.
- For the remaining product (from non-Member 2), source information on production systems could not be verified to provide sufficient assurance the product met minimum criteria under the Sourcing Code, and would therefore not be in alignment.[27]

Sourcing assessment (wild):

- All five products were sourced from farms certified to at least one independent standard/assurance system, and were in line with the Sourcing Code

4.9 Other products - Squid

In total, two squid products were purchased for review. RASS and MCS ratings were not available for the species of squid sourced by Member I and H. Therefore, Fishsource was used as a point of reference.

[26] Refer to Section 5.17.1. NM5 Labelling Review for more information.
[27] Refer to Section 5.8.2 NM2 Sourcing information for more information.

The scores are each calculated on a scale from zero to ten with information obtained from stock assessment reports and from management measures adopted in the fishery. A score of 6 is equivalent to 'acceptable standard with improvements required' and a score of 8 is an 'unconditional pass'.

Labelling and Sourcing assessment:

- From these two products, neither used environmental claims.
- Both products were sourced in alignment with Sourcing Code, with Member I changing suppliers due to limited engagement and progress on fishery and Member H sourcing from medium risk fisheries with actions in place to reduce risk.

4.10 Summary of Labelling

Of the 80 products purchased, 52 contained self-declared environmental claims on pack (48 were responsibility and four were sustainability claims) and of these, 43 products were labelled in line with the Labelling Code. Of the nine products that were not aligned with the Labelling Code, three did not meet the minimum requirements due to lack of available information and/or ability to verify claims, five did not use the correct language and/or terminology, and one product used a sustainability claim without the required third-party chain of custody. In total, SSC Members accounted for three of the products not aligned with the Labelling Code – two cases related to the same label and one case could not be verified.

By category, SSC Members made more environmental claims on products, with retailers and brands labelling 68% and 65%, respectively (Figure 5). Retailers labelled almost all of their own-brand farmed products with responsibility claims (94%). Non-SSC Members only labelled a little over half their products with self-declared claims.

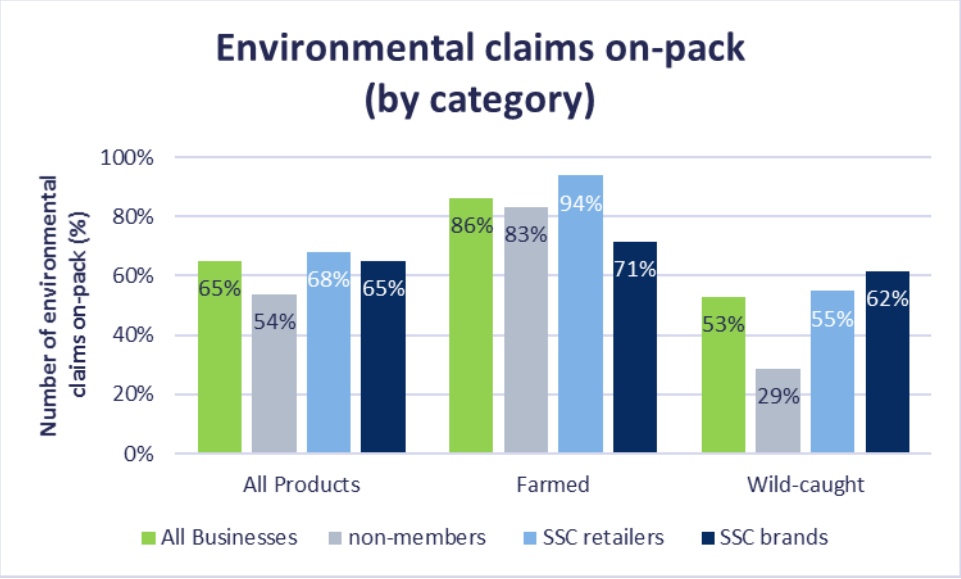

Figure 6: Summary of labelling assessment: Per cent environmental claims (by category).

5 IMPLEMENTATION ASSESSMENT RESULTS

The results of the Labelling and Sourcing assessment for all businesses reviewed are summarised below. Where applicable, claims used on own-brand products are listed along with relevant information used to support the claim[28]. For all environmental claims, the terms and language used must be consistent with acceptable claims of responsibility and sustainability, and meet the minimum criteria under the Labelling Code (as outlined in Section 3.3.1).

The Sourcing Code requires that businesses follow the five principles of good practice and apply these principles in a manner that is consistent with the spirit of the SSC Codes and the aims, vision and objectives of the SSC as a whole for their own brand products. It is recognised that full implementation of the codes across all products and species may take longer depending on the size of business, existing stock and other relevant considerations. Where SSC Codes are not yet fully implemented, it is recommended that Members have a plan in place with timelines and objectives for delivery, and discuss any changes with the secretariat as needed.

RETAILERS

5.1 MEMBER A

5.1.1 Labelling review

Eight products from Member A were purchased for review, with self-declared environmental claims made on six products– one sustainability and five responsibility claims. In addition to product specific claims, a general responsibility claim is included on frozen fish.

a) Product-specific claims

Sustainability claims – wild caught

One product sourced from MSC fishery. Use of sustainability claim is aligned with the Labelling Code.

- Tuna: Sustainably sourced claim with MSC logo. Product is sourced from a low fishery (Maldives) using pole & line and fishery is MSC certified, meeting minimum requirements for sustainability claims.

Responsibility claims – wild caught

Four products labelled with responsibility claims

- Lemon sole: 'From well-managed and responsible fisheries.' Product is sourced from medium risk fishery (North Sea IV, MCS rating 3) using seines and trawls. Now in a FIP under Project UK (with engagement and support of Member verified), product meets minimum requirements for responsibility claims.
- Scampi: 'Responsibly sourced.' Product sourced from low to medium risk fishery (North Sea IVa – MCS ratings from 2 to 4; and West Coast of Scotland VI – MCS rating 3) with specification for creel pots where possible (MCS rating of 2). Currently in discussions to set up a FIP and

[28] As mentioned in section 3.3.2, general claims used in corporate materials such as point of sale information and websites have been included for information only, but did not form part of the assessment.

improvement management; with additional measures in place to reduce bycatch. Product meets minimum requirements for responsibility claims.

- Cod: General responsibility claim: '*frozen fish is the same as our fresh fish, always responsibly sourced'* with MSC logo. Product is sourced from low risk fishery (Iceland Va) and is line caught (MCS rating 2). Product is MSC certified and meets requirements for either sustainability or responsibility claims.
- Alaskan salmon: General responsibility claim. Product is sourced from a low risk fishery (Alaska, MCS rating 1), meeting requirements for responsibility claim.

b) Other claims (for information only)

Point of Sale Claims:
"We're fishing responsibly" – shelves on chill cabinet
"We guarantee that all of our fish is responsibly sourced" – shelves on chill cabinet

A review of the corporate website and other media/materials found a fairly consistent claim that all fish is responsibly sourced.

Website Claims (corporate website):
"We're fishing responsibly, we only stock responsibly caught or farmed fish"

Review: Unable to verify all claims and fully verify the statements. Member A states only stocking own-brand fish and shellfish that meets their responsible sourcing criteria. The criteria, as outlined by Member A, were found to be in line with the SSC Code.

5.1.2 Sourcing review

Both wild-capture and aquaculture policies are in place and easily accessed on Member A's corporate website. Member A has public commitments that all own-label branded seafood will be third-party certified within a specified timeframe and states that all of fresh and frozen cod comes from Iceland and Norway and is certified as sustainable by the MSC.

a) Risk assessments and audits

Member A stated that they have an internal, in-house risk assessment system that is informed by MCS and RASS ratings. For all new sources, pre-sourcing audits are conducted by the supplier on behalf of the Member. Risk assessments for wild-caught species cover management, stock status, traceability and environment. They include responsible fishing methods to minimise bycatch of vulnerable and non-targeted species and to minimise discards. Farmed fish must be fully traceable back to approved farm sites.

Audit protocols include assessment of fish welfare, veterinary care, husbandry, protection of the marine environment and sources of marine-based feed ingredients. Assessment of farmed fish extends to marine feed ingredients, with feed for salmon, trout and halibut from IFFO-RS certified stocks, and feed for organic ranges (such as salmon, rainbow trout, and halibut) produced from trimmings and fully traceable.

b) Sourcing decisions and responses

Member A's sourcing policy covers four key areas including: sourcing only from known and approved farms, rearing fish to the highest animal welfare standards using responsible feeds and feeding regimes, and respecting the environment. Detailed questions were asked about the risk assessment process and sourcing outcome for cold-water prawns *(P. borealis),* lemon sole, scampi, and warm-water prawns *(P. Vannamei*), including any risk reduction activities or improvement projects in place supporting the decision to source.

- Cold-water prawns (MSC certified fishery, Canada): MSC certified product. Product sourced from verified third-party certified sustainable fishery – lowest risk option, supporting decision to source.
- Lemon sole (Traceback conducted) – Product traced back to vessel – North Sea, Danish seine & net). Fishery stock is data deficient, with MCS rating of 3 due to high risk of bycatch for all flatfish fisheries and high risk impact on habitat if trawls are used outside of core fishing areas. Fishery is in a FIP that is supported by Member A – and verified on FIP website.
- Scampi (West coast of Scotland, creel pots (MCS 2)): Sourced from North Sea and West Coast of Scotland with MCS ratings from 2 to 5. Risk was reduced by sourcing from small boats (creel pots) and to minimise bycatch by using separator grids and large mesh size to increase selectivity). Decision to source is aligned with SSC codes.
- Warm-water prawns – MCS allocate high risk ratings to intensive pond systems due to risks associated with marine feed source ingredients and variable enforcement of controls by local government. To reduce risk, source farm is GAA-BAP and ASC certified, which includes feed sustainability and traceability, with additional efforts being made to improve marine feed sources and increase certified through IFFO-RS.

***c)* Traceability and transparency**

Member A is transparent and provided a copy of their seafood policy as well as information on products in stock. On review of Member A's website, a phone number was provided for product quality concerns but not used in this study. No inquiries were made via customer service because contact details were not readily found on pack.

Tracebacks were conducted for two products - lemon sole and sea bass – verifying that traceability systems are in place and able to trace back to vessel and farm. The sea bass product was traced back to two source farms, both in Turkey. Farm systems are GlobalGAP certified, including feed, thereby reducing risk and meeting requirements for responsibility claims.

5.1.3 Assessment

Member A is operating in alignment with both the SSC Labelling Code and SSC Sourcing Code.

5.2 MEMBER B

5.2.1 Labelling review

Claims on eight products from Member B were purchased for review, with environmental claims on five wild caught products and three products that do not use claims. Member B uses 'responsibly sourced' and 'responsibly farmed' logos.

a) Product-specific claims

Responsibility claims – wild caught

Two wild-caught products are sourced from low risk fisheries and one product from medium risk (with measures to improve)

- Cod: 'Responsibly sourced.' Product is sourced from a low risk fishery (NE Arctic, ICES I & II), MCS rating 2). High risk of bycatch identified by RASS but there are monitored improvement plans in place to reduce risk, meeting minimum requirements for responsibility claims under the Labelling Code.
- Coldwater prawns: 'Responsibly sourced.' Product sourced from low-medium risk fishery (US EEZ). Data limited species. Mitigation measures are in place to reduce risk of habitat impact and bycatch to lower risk, meeting minimum requirements for responsibility claims under the Labelling Code.
- Alaskan salmon: 'Responsibly sourced.' Product is sourced from low risk fishery (Alaskan, MCS rating 1), and meets requirements responsibility claims under the Labelling Code.

Responsibility claims - farmed

- Warm-water prawns: 'Responsibly sourced.' Product is sourced from an ASC and GAA-BAP certified farm (Vietnam), reducing sourcing risk to low-medium across the supply chain, meeting minimum requirements for responsibility claims in line with the Labelling Code.
- Sea bass: 'Responsibly farmed.' Product is sourced from farm (Turkey, MCS rating 3), which is GlobalGAP certified, meeting requirements for responsibility claims under the Labelling Code.

b) Other claims (for information only)

Additional claims found from a range of sources including point of sale and website.

Point of Sale Claims:

"*Responsibly sourced and farmed*" – poster board over chill cabinet.

"Assure our customers that we are sourcing our wild fish only from responsibly managed fisheries".

Issue: Potential claims overreach. This is potentially misleading unless *all* fish and seafood products are sourced responsibly. Currently there are some fisheries in transition to a FIP that do not meet requirements but a timebound commitment has been set to have these engaged in a FIP by early summer.

5.2.2 Sourcing review

General sourcing policy statements are available online. The most comprehensive is a position statement from August 2015 which makes reference to a timebound commitment that all own brand seafood will be from third party verified responsible sources. On request, a copy of the technical sourcing policy was available and reviewed for this exercise.

a) Risk assessments and audits

Member B has partnered with an independent competent party (an NGO)[29] to develop a robust system for evaluating the sustainability of all source fisheries, their fishing methods and the impact of this on the wider marine environment. For wild capture fish, Member B uses data provided by their partner NGO to assess fisheries against criteria on governance, target stock and the environment with outcome converted into a Red/Amber/Green rating. Suppliers to Member B send data to the NGO partner on a monthly basis for review. Member B and the NGO meet on a quarterly basis to review this information, with recommendations from their partner NGO on how to engage with or work to improve the fishery where appropriate.

For farmed fish, Member B has its own code of practice for core species such as cold water prawns, salmon, trout and white fish, extending across all stages in the life cycle and covering traceability, feed, animal health and welfare, environment etc. All fish farms are independently audited to ensure implementation and re-audited on a risk basis. Suppliers of farmed fish must meet and be audited against the relevant aquaculture code of practice by an approved third party auditor on a risk assessed basis.

b) Sourcing decisions and responses

Based on risk assessment outcomes as developed with NGO partner, any medium to high risk fisheries are only sourced where there are opportunities to engage and improve risk rating, either through FIPs or other actions. Member B informed that any high risk sources that are *in process* of engagement with a FIP or in development stages of improvement plan must be fully engaged by early summer 2017.

Detailed questions were asked about the risk assessment process and sourcing outcome for scampi, plaice, and wild caught salmon, including any risk reduction activities or improvement projects in place supporting the decision to source.

- Scampi (traceback conducted) – Product was traced back to a small group of vessels fishing in the West of Scotland and the Irish Sea (VIa and VIIa)) using trawls, and covering multiple habitat areas ranging from low to medium risk. Member B informed that they are working towards the fishery being included in a FIP due to concerns regarding bycatch, habitat and poor management. In the interim, they are regularly monitoring performance of the fishery and reviewing the decision to source/continue sourcing.
- Plaice (traceback conducted) – Product was traced back to a small group of vessels (day boats) fishing in the North Sea (IVa). Stock status is low risk (RASS) but with higher risk of bycatch. Fishery is in a formal FIP under Project UK that is supported by Member (verified on FIP site). Member B informed they are also working with suppliers to develop specific improvement actions, particularly in relation to the capture of juvenile fish. Decision to source is in line with minimum criteria as set out in the Sourcing Code.
- Salmon: Wild Alaskan salmon sourced from low risk certified fishery (Bering Sea and Aleutian Islands - BSAI, MCS rating 1). Product meets requirements for responsibility claims.

[29] This organisation is accepted as an independent competent party by the SSC (SSC Guidance on Voluntary Codes of Conduct, pg. 12).

c) Traceability and transparency

Member B is transparent, with information on responsible sourcing policy and process available online. A copy of their sourcing policy and product list was made available on request. Further transparency is provided through engagement with their NGO partner for support in risk assessment and sourcing decisions.

Traceback requests were conducted for two products – plaice and scampi - and verified traceability systems are in place and able to trace back to vessel/group of vessels.

5.2.3 Assessment

Member B is operating in alignment with SSC Labelling Code and SSC Sourcing Codes.

5.3 MEMBER C

5.3.1 Labelling review

Of the eight products purchased for this study, three farmed fish products included responsibility claims ('responsibly farmed' with independent third-party certifications), but the remaining five products had no claims. Note: Member C does not use sustainability claims as a matter of corporate policy and only uses responsibility claims for farmed products.

a) Product-specific claims

Responsibility Claims - farmed

Three responsibly farmed claims:

- Warm-water prawns: Responsibly farmed; Product is sourced from farm system that are third-party certified for GlobalGAP and GAA-BAP certified (3* 4*) systems, which supports use of responsibility claim under the Labelling Code.
- Salmon: Responsibly farmed: Product is sourced from medium risk farm system (Norway, MCS rating 3). Farm is also GlobalGAP certified, meeting minimum requirements for responsibility claims.
- Sea bass: Responsibly farmed. Product is sourced from Turkey using open net systems of production (MCS rating 3). Farm system is GlobalGAP certified to reduce risk and meet minimum requirements for responsibility claims.

5.3.2 Sourcing review

A copy of the sourcing policy (dated October 2015) was made available on request and used in this study. Traceback requests were made for two products: prawn cocktail (cold-water prawns) and breaded plaice.

a) Risk assessments and audits

Member C conducts a risk assessment for every species sold in store – done by species and by supplier. The assessment includes all relevant sustainability criteria, such as stock levels, fisheries management, and where / how fish are caught as part of a rigorous "decision tree" process and is informed by data from Fishsource. Each species has to meet a set of conditions before it goes into store.

Suppliers are reviewed yearly. The primary supplier conducts risk assessment on all existing and new suppliers of fish and seafood that considers safety, quality and legality issues along with a vulnerability

assessment for IUU. The results of the review are used to determine appropriate control measures to ensure requirements of the corporate policy are met.

b) Sourcing decisions and responses

Every species is assessed for risk and where necessary, individual action plans are set out to improve the supply chain (this includes fishmeal targeted species). Member C stated that their preference is to stock fish rated 1, 2 and 3 (MCS), and to only stock species rated 4 and 5 where supporting evidence is provided that has been independently assessed and verified, was in their supply chain prior to October 2013, or is included within a formal fishery improvement project.

Detailed questions were asked about the risk assessment process and sourcing outcome for plaice, cold-water prawns, scampi, and King prawns, including any risk reduction activities or improvement projects in place supporting the decision to source.

- Plaice (North Sea – trawls, and E/W Channel; Iceland-seine): MCS rating 3 but fishery in North Sea (IV) is now in a Project UK FIP that is supported by Member.[30] Member C informed that to minimise risk of sourcing juveniles, they revised quality specifications for product (such as for frozen product where two fish are combined)). Decision to source is in line with minimum criteria as set out in the Sourcing Code.
- Cold-water prawns (Greenlandic and MSC certified Canadian/ Icelandic – results from traceback): Sourced from low risk fishery (MCS rating 2) with moderate risk of bycatch. Fishery is MSC certified with additional measures in place to reduce bycatch, increase selectivity and reduce impact of fishing gear on seabed, which supports decision to source under the Sourcing Code.
- Scampi (Scottish and Irish Seas): MCS rating from 2 to 4 with high risk of bycatch and management concerns – stock is currently assessed at the FU level (habitat) but managed at the ICES division level. To mitigate, Member is actively involved in trying to set up a FIP and is working with suppliers to improve gear selectivity, thereby meeting minimum requirements under the Sourcing Code and supporting the decision to continue sourcing.
- King prawns (Vietnam): MCS rating of five assigned to the region due to critical risk associated with marine feed source/sustainability as well as other environmental risks. Source farm system is ASC-certified (which includes feed) with additional efforts to improve marine feed source through a FIP, to increase traceability and sustainability of feed through IFFO-RS and/or other third party certification to reduce sourcing risk across the supply chain. Decision to source is supported and in line with minimum criteria as set out in the Sourcing Code.

c) Transparency and traceability

General information on responsible sourcing for wild capture and farmed fish is easily accessed on the corporate website and includes several links to partnerships, projects and other collaborations. Member C is transparent and reports annually on source fisheries through the Ocean Disclosure Project (ODP).

[30] Project UK North Sea plaice & lemon sole FIP, mixed gear. http://www.seafish.org/industry-support/fishing/project-uk/project-uk-fisheries-improvements

Tracebacks were conducted on cold water prawns and plaice and verify that traceability systems are in place to trace product back to vessel/group of vessels.

5.3.3 Assessment

Member C is operating in line with SSC Sourcing and Labelling Codes.

5.4 MEMBER D

5.4.1 Labelling review

A total of eight products were purchased under Member D's own label, six used responsibility claims and two products had no claims. Member D has their own-brand farm assurance standard and where indicated on pack, it was considered to be equivalent to making a responsibility claim.

a) Product-specific claims

Responsibility claims- wild caught

Three wild-caught products:

- Tuna: 'Responsibly caught', 'Responsibly sourced'. Product is sourced from low risk fishery using pole & line (MCS rating 1). Product is MSC certified – verified using MSC website – and meets minimum requirements for responsibility claims under the Labelling Code.
- Cod: 'Responsibly sourced'. Product is sourced from a fishery in a FIP (NW Atlantic, Newfoundland & Labrador) that is supported by Member D, and meets minimum criteria for responsibility claims under the Labelling Code.
- Plaice: 'Responsibly sourced'. Product sourced from low risk fishery (ICES V, MCS rating 2) using trawls and seines, with high bycatch/habitat risk. Fishery is in a Project UK FIP supported by Member and meets requirements for responsibility claims under the Labelling Code.

Responsibility claims – farmed

Three farmed fish products used Members' own-brand farm assurance standard claims plus at least one other certification standard:

- Warm water prawns: 'Responsibly sourced'; Product is sourced from ASC certified and own-brand farming system (Honduras), meeting minimum requirements for responsibility claims under the Labelling Code.
- Sea bass: Own-brand responsibility claim. Product is sourced from Turkey using open sea pens (MCS rating 3). Farm systems are independently audited to own-brand farm standard and GlobalGAP certified to reduce risk, which meet minimum requirements for responsibility claims.
- Salmon: Own-brand Responsibility claim: Product is sourced from Lochmuir, Scotland (MCS rating 3), and independently audited to the brands own assurance standard. Farm is also RSPCA certified, further reducing sourcing risk to meet requirements for responsibility claims.

5.4.2 Sourcing review

Member D's website contains sourcing policies and standards for wild-caught, farmed fish, shellfish and aquafeed; information on their risk assessment and audit process; and a list of programmes, projects and collaborations they are involved in, including FIPs and the SSC. Member D works in partnership with

an environmental NGO,[31] with a public commitment to improve responsible sourcing of sustainable seafood in addition to a number of other sustainability commitments. Within this partnership, the NGO acts in an advisory capacity, assessing fisheries risk, advising on sourcing and recommending advice on appropriate responses when necessary.

b) Risk assessments and audits

For wild-capture fisheries, risk outcome is divided into categories of low, medium or high risk as defined by the partner NGO which categorises low risk as MSC certified (or in full assessment), in a FIP and/or with improvement programmes in place demonstrating sustainability; while medium risk fisheries require improvement (a few sustainability issues identified) and high risk fisheries require significant improvement, with major sustainability issues identified.

Member D also has its own farm assurance standard which have been set out in species-specific Codes of Practice, with criteria and auditing requirements all available online. These are minimum standards and have been developed in collaboration with suppliers, industry experts and NGOs. They cover criteria such as site selection, environmental management, rearing of fish, fish health and welfare (including slaughter), the use of chemicals, waste disposal, employee welfare and broader community requirements. All farms must be certified to at least one of the main aquaculture standards and be operating in compliance with the Member's own standard.

Although an assessment of the farm standard was outside the scope of the project, the minimum requirements were consistent with the scope outlined in the SSC guidance on Good Aquaculture Standard or code of practice[32] and audited by direct suppliers and/or third party auditors.

c) Sourcing decisions and responses

Member D's partner NGO conducts annual species sustainability assessments on their behalf, using information provided by suppliers to assess against stock status and biology, environmental impact, and management (including fishery improvement measures). Whenever possible, the first choice is to source from the most responsible and low risk sources (e.g. certified) and to avoid the worst offenders rated high risk by MCS/RASS) that do not meet minimum criteria established by the partner NGO. For all others, the advice is to invest and support the recovery and improvement of both wild-caught and farmed species through engagement and actively encouraging participation in Fishery and Aquaculture Improvement Projects.

For aquaculture: All producers of farmed fish and seafood must be in full compliance with Member D's farm assurance standard. [33] There are currently six species-specific profiles.

Detailed questions were asked about the risk assessment process and sourcing outcome for cold water prawns, cod and plaice, including any risk reduction activities or improvement projects in place supporting the decision to source.

[31] This organisation is accepted as an independent competent party by the SSC (SSC Guidance on Voluntary Codes of Conduct, pg. 12).
[32] SSC Guidance on Voluntary Codes of Conduct, 3.2 pg.19
[33] Farm standard has 6 species assessments - organic salmon, Atlantic salmon, seabream & seabass, rainbow trout, turbot and farmed shrimp.

- Cold water prawns (traceback conducted back to two vessels, FAO 27 Va). Fishery is high risk (stock status & habitat, moderate risk bycatch – RASS) with mitigation measures in place to reduce bycatch (i.e. sorting grid and discard ban) although NGO partner noted improvements still required for habitat. Fishery is in a FIP, supported by Member at time of sourcing.
- Cod (traceback conducted) – Product traced back to small group vessels using mainly hooks (some nets), in Newfoundland NAFO 2J3KL. Fishery is rated high risk but has been in a FIP since 2015 to rebuild the stock, with support/engagement of Member confirmed by NGO partner.[34] Additional mitigation measures in place to reduce bycatch through technical and spatial measures and although stock status remains critical (MCS), biomass is improving. With an improvement plan and monitoring in place as part of FIP, decision to source meets minimum sourcing criteria under the Sourcing Code and is approved by NGO partner.
- Plaice: Sourced from Iceland (Va), with an overall low RASS risk with Danish seines and medium risk using otter trawls (although habitat impact can be minimised by limiting fishing to core fishing areas). Other risk mitigation actions such as establishment of new marine protected areas and discard ban, resulting in better monitoring and control of bycatch, further reduce fishery risk, meeting minimum sourcing criteria under the Sourcing Code.

d) Traceability and transparency

Member D is committed to achieving full traceability of all their seafood and aquafeed, to make sure farmed species can be traced back to the farm and wild fish back to the vessel (or group of vessels), which includes wild caught fish for aquafeed (with key ingredients traced back to the factories that manufactured them). The NGO partner informed that traceability checks are conducted frequently. Two tracebacks were conducted on cold-water prawns and Atlantic cod verifying that traceability systems and controls are in place, tracing back product to vessels or a small group of vessels.

No additional inquiries were made through customer service because contact information (email/phone) was not readily available on-pack.

Publicly available information on Member D's seafood sourcing policy and source fisheries was easily accessed on their corporate website and the most comprehensive of all businesses reviewed. It includes access to their seafood sourcing programme (such as standards, risk assessment, audit process) as well as a published list of source fisheries. The NGO partnership adds a further level of transparency to their risk assessment and decision making process, with the NGO also responsible for setting out improvement requirements/plans.

5.4.3 Assessment

Member D is operating in alignment with the SSC Labelling and Sourcing Codes.

[34] WWF-Canada Newfoundland cod FIP. http://www.wwf.ca/conservation/oceans/fip/newfoundland_fip/

5.5 MEMBER E

5.5.1 Labelling review

Member E only uses responsibility claims on pack (no claims of sustainability). In total, eight products were purchased for review, five had responsibility claims and three products had no self-declared environmental claims.

a) Product-specific claims

Responsibility claims – wild caught

Two responsibly sourced products from low risk fisheries.

- Tuna: 'Responsibly sourced'. Product is sourced from low risk fishery using pole & line (Western Pacific, MCS rating 2), which supports use of responsibility claims under the Labelling Code. Product also uses a general claim regarding catch method: "…*use traditional pole and line to minimise impact on environment and other marine life".*
- Cod: 'Responsibly sourced'. Product is sourced from low risk fishery (NE Arctic) using hooks & lines (MCS rating 2) and is also MSC certified as verified on MSC product finder website. Use of responsibility claim meets minimum requirements under the Labelling Code.

Responsibility claims – farmed

Three responsibly farmed products with third-party certifications.

- Warm-water prawns: 'Responsibly sourced'. Product is sourced from ASC and GAA-BAP certified farm systems in Honduras, meeting minimum criteria for responsibility claims.
- Sea bass: 'Responsibly sourced'. Product is sourced from open net farm systems in Turkey (MCS rating 3), which is GlobalGAP certified, meeting minimum requirements for responsibility claims.
- Salmon: 'Responsibly sourced'. Product is sourced from open net farm systems in Scotland (MCS rating 3), that are RSPCA and GlobalGAP certified.

5.5.2 Sourcing review

Member E has made a public commitment to source all wild fish from third-party certified sources within a specified time frame. All farmed salmon and warm-water prawns are already responsibly sourced from third-party certified farms.

a) Risk assessments and audits

General information was provided by Member E on the decision -making process that is currently in place, including the application of risk assessments across all wild-caught and farmed fish. Member E has their own risk assessment tool in place, which is informed by data from Fishsource. All essential criteria are covered in the assessment. Direct suppliers assess farms prior to sourcing and on a regular and risk-based basis thereafter.

b) Sourcing decisions and appropriate responses

The assessment generates a risk outcome from a scoring system created by Member E. Where appropriate, reasonable measures are taken to minimise fisheries risk. Detailed questions were asked about the risk assessment process and sourcing outcome for plaice, warm-water prawns, salmon and scampi, including any risk reduction activities or improvement projects in place, supporting the decision to source.

- Plaice (traceback conducted) - Product was sourced from the North Sea (IV), an area with MCS ratings ranging from medium to high. This fishery is now in a FIP (under Project UK), which is supported by the Member– with support/involvement verified on FIP site.[35] Member E is also working on projects for gear selectivity to reduce bycatch. Decision to source meets minimum requirements under the Sourcing Code.
- Warm-water prawns (farmed): Product is sourced from ASC and GAA-BAP certified farm systems in Honduras. Member informed they are working to improve marine feed traceability – a critical concern highlighted by MCS - and to source only from certified fisheries. Decision to source meets minimum requirements under the Sourcing Code.
- Salmon (farmed): Sourced from farming system third-party certified to both GlobalGAP and RSPCA. Member stated that they use dedicated suppliers to ensure production is to their specification, working closely with them to improve systems and holding regular quarterly meetings to monitor progress. Actions taken to improve system/reduce sourcing risk support decision to source.
- Scampi: Sourced from West of Scotland and Irish Sea (VIa and VIIa) which has moderate to high MCS rating of 3 and 4. Main issues relate to high bycatch and habitat impact.[36] Otherwise, stock is healthy in these areas and well below MSY. Member E informed that habitat impact in area is not as significant (lower risk) because substrate is mobile so trawl not a major concern. Overall risk is lower, with Member actively involved in discussions to set up a FIP, supporting decision to source.

c) Traceability and transparency

A traceback was requested on pre-packed plaice fillets which traced the product back to the North Sea with documented evidence provided to support. Results verified that traceability systems are in place and can trace product back to vessel/group of vessels.

Publicly available information on seafood sourcing was limited and primarily focussed on sustainable fishing/fisheries commitments and targets. This was communicated through high-level progress updates via Annual Reports and Corporate Responsibility update reports as well as through blogs and press releases on Member E's website. A few case studies reported on projects and initiatives at the fisheries level but most related to setting and meeting targets. There was no mention of other collaborations on the website but evidence of engagement was found on third party websites.

5.5.3 Assessment

Member E is operating in compliance with the Labelling and Sourcing Codes.

[35] Project UK North Sea plaice & lemon sole FIP, mixed gear. http://www.seafish.org/industry-support/fishing/project-uk/project-uk-fisheries-improvements

[36] Irish sea– non- targeted fishery so high discard rate.

5.6 MEMBER F

5.6.1 Labelling review

Seven products were reviewed across all categories except for scampi, which was not available in store at the time of the visit (no substitute was purchased). Of the seven products purchased for review, all were labelled with the claim "Responsibly sourced fish" or "Responsibly sourced". In addition to these claims, Member F includes general responsibility claims about the sourcing of wild-caught fish (found on all four products) and general responsibility claims about the sourcing of farmed fish (found on two of three products).

a) Product-specific claims

Responsibility claims – wild caught

Four products sourced from low risk fisheries, of which two are from MSC certified fisheries.

- Tuna: 'Responsibly sourced'. Product is sourced from low risk fishery using pole & line (Atlantic (FAO 34, 41), MCS rating 2) and meets minimum requirements for responsibility claims under the Labelling Code.
- Cod: 'Responsibly sourced'. Product is sourced from low risk fishery (NE Arctic and Iceland), meeting minimum requirements for responsibility claims under the Labelling Code.
- Yellowfin sole: 'Responsibly sourced'; with MSC logo. Product is sourced from MSC certified fishery (Alaska Bering Sea and Aleutian Islands (BSAI)) using trawls, meeting minimum requirements for responsibility claims under the Labelling Code. Note: product also meets sustainability requirements.
- Coldwater prawns: 'Responsibly sourced'; with MSC logo. Product is sourced from MSC certified fishery (NW Atlantic, Canada EEZ), meeting minimum requirements for responsibility claims under the Labelling Code.

In addition to product specific claims, all wild-caught fisheries products included a general environmental claim on-pack (listed as a general 'responsibly sourced' statement):
"All our wild fish is responsibly sourced – approved using independent scientific advice."

Review: Member F relies on information and advice from an independent competent party (an NGO) to source responsibly.[37] This NGO conducts external risk assessments on all fish used in Member F's own brand products and identifies improvement actions where required. The external verification provided by the NGO and which is based on scientific advice, supports the above claim. This responsibility claim is therefore considered to be in aligned with the SSC Codes.

Responsibility claims - farmed

Three farmed products are all sourced from farms with at least one third party certification.

[37] This organisation is accepted as an independent competent party by the SSC (SSC Guidance on Voluntary Codes of Conduct, pg. 12).[38] This organisation is accepted as an independent competent party by the SSC (SSC Guidance on Voluntary Codes of Conduct, pg. 12).

- Sea bream: 'Responsibly sourced'. Product is sourced from Turkey (MCS rating 3) and GlobalGAP certified to reduce risk, meeting minimum requirements for responsibility claims under the Labelling Code.
- Warm water prawns: 'Responsibly sourced'. Product sourced from ASC certified farm system with GAA-BAP certified hatchery and feed, reducing risk across the supply chain. Product meets minimum requirements for responsibility claims under the Labelling Code.
- Salmon: 'Responsibly sourced'. Product sourced from Scotland and certified to GlobalGAP and RSPCA standard. Product meets minimum requirements for responsibility claims under the Labelling Code.

With the exception of one product (pre-packed Sea Bream) all farmed fish products included the following claim: *"All our farmed fish is responsibly sourced – meeting approved independent standards."*

Review: Member F sources only from farms that are third-party certified to independent assurance schemes which include ASC, GlobalGAP, GAA-BAP.

5.6.2 Sourcing review

Information on Member F's approach to responsible fish sourcing is available on their corporate website. It includes a commitment to sourcing only from well-managed fisheries or farms for all own-brand fresh, frozen or further processed fish, and to meeting the requirements of the SSC codes. Detailed information on source fisheries is reported annually through the ODP. Member F's fish sourcing policy (dated 12/2016) is also publicly available and easily accessed online.

a) Risk assessment and audits

Member F stated that they regularly review their own-brand fish range, checking against responsible sourcing criteria to ensure all products are only sourced from well-managed fisheries or farms. To achieve this objective, an external risk assessment is conducted by their partner NGO to assess fishery risk across a range of factors, including stock health, management etc. Member F informed that for stocks of wild fish, they refer to Fishsource for the latest scientific advice and for farmed fish, they use independent assurance schemes. Member F meets regularly with their partner NGO to review fishery status and associated risks.

b) Sourcing decisions and appropriate responses

A scoring system is used to determine whether Member F will source/continue sourcing a product and, where risks are identified, the NGO provides recommendations on how to improve. Member F stated that while they do not stock any fisheries products rated 5 by MCS, they do source from a few higher risk fisheries at present. However, these are largely data deficient stocks where there is an engagement plan in place or where the fishery is in transition to MSC certification. Where a fishery is scored as medium risk, Member F may also go back to suppliers to ask for improvement.

Detailed questions were asked about the risk assessment process and sourcing outcome for Atlantic cod, yellowfin sole, King prawns, including any risk reduction activities or improvement projects in place supporting the decision to source.

- Cod: Sourced from low risk fishery in NE Arctic (Barents Sea, Russia, and Iceland), which supports decision to source.

- Yellowfin sole: Sourced from certified Alaska Bering Sea and Aleutian Islands (BSAI) fishery using trawls. Risks identified by the MCS relate to the potential bycatch of a few prohibited species (e.g. red king and snow crab and Pacific Halibut) but BSAI has sufficient mitigation and enforcement measures in place to reduce risk, which supports the decision to source.
- Warm-water king prawns (traceback conducted) – Product traced back to ASC certified farm in Indonesia, with GAA-BAP certified hatchery and nursery. Critical risks identified by the MCS within the region relate to feed sustainability, with efforts being made to mitigate risk via the ASC standard, thereby which limits use of wild fish in feed and requires full traceability back to a responsibly managed source. Minimum criteria met under the Sourcing Code, supporting decision to source.

c) Traceability and transparency

Traceability systems and controls are in place and verified by two tracebacks (conducted on warm water prawns and tuna). An email inquiry was made through customer service regarding the origin of a product containing cod and the response included information on catch area and subarea.

Member F is very transparent and information on sourcing is easily accessible online and in annual reports provided as part of the Ocean Disclosure Project (ODP).

On-pack labelling for all Member F's products was among the clearest and most informative of all Members reviewed and should be considered best practice in terms of customer engagement. All labels included a freephone number and email address for consumer inquiries, along with a reference number (listed on pack), barcode number and date code.

5.6.3 Assessment

Member F is operating in alignment with the SSC Labelling and Sourcing Codes.

5.7 NON-MEMBER 1

5.7.1 Labelling Review

Four products were purchased for review – tuna, Atlantic cod, warm-water King prawns, and farmed seabass. Of these, three products used claims (one product used a sustainability claim while the other two used responsibility claims).

a) Product-specific claims

Sustainability claims – wild caught

- Cod: 'Sustainably sourced'. Product sourced from low risk fishery (Norwegian / Barents Sea (I & IIa), or Iceland Grounds (Va)) using hooks and lines. From ODP, all Atlantic cod is from certified fisheries– verified on MSC product finder. However, as there is no chain of custody in place, the product would not meet the requirements for sustainability claims under the Labelling Code.

Responsibility claims - farmed

Two farmed products were labelled as responsibly farmed but it was not possible to verify the type of certification or the extent of coverage (i.e. whether it applied only to farm/processing or to

nursery/hatchery). Information on source of marine feed and traceability is also required to ensure that critical risk areas on marine feed source ingredients are adequately dealt with.

- Warm-water king prawns – Farmed in Vietnam. 'Responsibly farmed'. From corporate website –warm water prawns are from GAA-BAP certified farms, but unable to determine if certification extends across supply chain to feed and addresses risks associated with sourcing of marine feed/ingredients as identified by the MCS. Unable to verify risk of source farm or mitigation actions in place to reduce risk and meet minimum requirements for responsibility claim. Therefore, on the basis of available public information only, the product would not be aligned with the Labelling Code.
- Sea bass: 'Responsibly farmed'. Product sourced from Turkey. Unable to determine if source farm and the rest of supply chain was certified (and to what certification). Therefore, on the basis of available public information only, the product would not be aligned with the Labelling Code.

5.7.2 Sourcing information

This business is transparent in reporting, as it publishes comprehensive sourcing information through the ODP on an annual basis. It has partnered with an NGO to assess the risks of wild-capture fisheries. Information on their corporate website is limited to general commitments to responsible sourcing and does not provide sufficient information on farming systems and associated accreditations.

5.7.3 Assessment

Of the three products that used environmental claims, none would be aligned with the Labelling Code. Of the total of four products, two wild-caught products would be aligned with the Sourcing Code. Information for two farmed products could not be verified. On the basis of available public information only, the products would therefore not be aligned with the Labelling Code or Sourcing Code. Further investigation would be required to assess risk of source farm and verify application of certifications to feed.

5.8 Non-Member 2

5.8.1 Labelling review

Three species were reviewed – one of which was a mixed fishcake product containing two species (prawn and scampi). The other product was salmon fillets (farmed). No claims were made on any products.

a) Product-specific claims

There were no claims to review.

5.8.2 Sourcing information

An outline of non-Member 2's Fish Buying Policy is available online along with general commitments to increasing the sustainability of own-label fish products. Within these commitments, there is a goal to

source 100% of their own-label farmed fish and seafood products from farms certified to ASC, GlobalGAP, or GAA-BAP (2* or above).

Non-Member 2 has an established partnership with an independent competent party (NGO)[38] and is working with them to increase the amount of green-rated fish (and decrease the amount of red-rated fish) they sell. Their partner NGO also conducts an annual third-party evaluation of their product range. Publicly available information on coldwater prawns, scampi and farmed salmon was sought to assess alignment with the Sourcing Code:

- Coldwater prawns: Product sourced from NE Pacific, no subarea information provided. If sourced from US EEZ (excl. Alaska), product is low risk and if sourced Canadian EEZ, it is medium risk. Risk reduced through bycatch reduction measures and habitat protection, which would support decision to source.
- Scampi: Product sourced from low to high risk fishery (North Sea, W. Coast of Scotland and N. Ireland). Unable to verify source fishery information to provide sufficient evidence that product would be sourced in alignment with the Sourcing Code.
- Salmon (farmed): Product is sourced from farms in Norway and Scotland (MCS rating 3). Unable to verify if critical risk issues associated with feed sourcing are mitigated through certification or other means, and would support decision to source in line with Sourcing Code.

5.8.3 Assessment

Of the three products assessed, only one would be aligned with the SSC Sourcing Code. Source farm and fishery information for the other two products could not be verified to provide sufficient evidence that products would meet minimum requirements under the Sourcing Code.

Therefore, on the basis of available public information only, two of three products would not be aligned with Sourcing Code.

BRANDS AND PROCESSORS

5.9 MEMBER G

5.9.1 Labelling review

This Member has their own responsible sourcing standard (with logo) that can be applied to wild caught and farmed fish. When used on-pack, it was considered to be equivalent to making a responsibility claim. Of the five products purchased, four had self-declared environmental claims and one product had no claims.

a) Product-specific claims

Responsibility claims – wild caught

Three wild caught – All with own brand RS claim and logo (i.e. 'Responsibly Sourced' claim)

[38] This organisation is accepted as an independent competent party by the SSC (SSC Guidance on Voluntary Codes of Conduct, pg. 12).

- Cod: Own-brand RS logo. Product is sourced from a low risk fishery (FAO 27, I & II, MCS rating 2) using trawls, with efforts to mitigate potential bycatch risk in place. Product meets minimum requirements for responsibility claims under the Labelling Code.
- Plaice fillets: Own-brand RS logo. Product is sourced from a medium risk fishery (North Sea IV, MCS rating 3) using trawls. The fishery now is now in a formal FIP under Project UK, meeting requirements for responsibility claims under the Labelling Code.
- Pink salmon fillets: sourced from low risk fishery (FAO 67 or FAO 61) MCS rated 1&2, meeting requirements for responsibility claims under the Labelling Code.

Responsibility claims - farmed

- Warm water prawns: Own-brand Responsibly Sourced logo. Product is sourced from ASC and GAA-BAP certified farms (Indonesia), which includes traceability and sourcing requirements for feed. Product meets minimum requirements for responsibility claims under the Labelling Code.

5.9.2 Sourcing review

General information on sourcing policy and process is available on Member G's website. A copy of their seafood product list and a copy of the sourcing policy with decision tree were available on request

a) Risk assessments and audits

Member G stated that detailed sustainability assessments are conducted for every source, using the most up to date credible science on the production method, while ensuring that the management is responsible, environmental impact is acceptable and that all of the relevant laws are adhered to. Fisheries or farms with credible and independent certification such as the MSC or GAA are automatically progressed as low risk but sources which are not third-party certified are subjected to a full in-house assessment which includes: legality, impact of target fish and of gear on wider ecosystem, management (structure and efficacy), welfare and continuous improvement.

For farmed fish, recognised independent schemes included Global Gap (plus standard for feed manufacturers), GAA (4*) and ASC. Member G's sourcing policy also includes, marine ingredients in feed which must either be assessed as green (low risk) or in a FIP.

Member G has also developed its own responsibility standard that can be applied to aquaculture and wild fisheries to ensure that seafood is bought from responsible producers and fishers with an acceptable level of impact.

b) Sourcing decisions and responses

Sources rated as low risk automatically qualify for the purchasing team to buy from whereas sources rated as Medium risk or in extreme cases High risk will only ever be sourced from if the Member believes they can improve the sustainability of the operation. Sourcing will only progress with firm commitments that are time bound and which result in effective improvement. However, if such actions are not progressed or not effective, Member G will stop sourcing the product (as per the conditions outlined in the SSC Sourcing Code).

Detailed questions were asked about the risk assessment process and sourcing outcome for scampi and plaice, including any risk reduction activities or improvement projects in place supporting the decision to source.

- Scampi (traceback conducted) – Product traced back to a group of vessels in Irish Sea and Celtic Sea North using trawls. Fishery is low to medium risk. Member G is actively engaged in discussions to set up a FIP and is working on improving gear selectivity and other vessel measures to decrease by-catch. Appropriate improvement actions are in place to reduce risk, meeting minimum sourcing requirements under the Sourcing Code and supporting decision to source.
- Plaice (traceback conducted) – From traceback, plaice is traced back from vessels in North Sea IV with trawls. Fishery is in a formal FIP under Project UK, which is supported by Member (verified on FIP website). Improved management and engagement of fishery reduces risk rating, meeting minimum sourcing requirements under the Sourcing Code.

c) Traceability and transparency

To verify traceability systems, traceback exercises were conducted on two products - scampi and plaice. Information from tracebacks supported responsibility claims.

Member G is transparent with general information on their sourcing policy and process available online, along with a short description of the SSC and how the business is applying the codes.

5.9.3 Assessment

Member G is operating in alignment with SSC Labelling and Sourcing Codes.

5.10 Member H

Four branded products were purchased for review and five species assessed—one product was a mixed product containing two species—warm water prawns and squid.[39]

5.10.1 Labelling review

Of the five species reviewed, all were associated with responsibility claims except for the squid.

a) Product-specific claims

Responsibility claims – wild caught

One wild caught:

- Atlantic cod: 'Responsibly caught'. Product is sourced from low risk fishery (NE/NW Atlantic, Russian, Barents & North Sea) using trawls and lines. The cod is MSC-certified and appropriately labelled with a responsibility claim.

Responsibility claims - farmed

Three farmed species:

- Warm-water prawns: 'Responsibly farmed'; Product is sourced from GAA-BAP certified farm systems.
- Sea bass: 'Responsibly farmed'; Product is sourced from farm systems in Turkey that are GlobalGAP certified, meeting minimum requirements under the Labelling Code.

[39] Mixed products were treated as two where responsibility claims were species specific.

5.10.2 Sourcing review

A copy of the fish sourcing policy document was available on request and used for this exercise. It covers all fish sourced for Member H. Detailed questions were asked about the sourcing of seabass, salmon & cod and squid and two traceback exercises were conducted for seabass and salmon-cod cakes.

a) Risk assessment and audit

Member H informed that risk assessments are conducted on everything that they buy, with all fish sourced assessed against strict environmental global standards. Through their audit programme, Member H checks that suppliers are meeting criteria at all stages. As part of the assessment process, Member H uses information from Fishsource, MCS and RASS to rate as high, medium or low. Information reviewed includes whether fishery is in a FIP and if it is targeting MSC certification.

b) Sourcing decision and appropriate responses

Member H sources from farms that have been certified to an independent standard and checked against the Member's own criteria. Wild caught fish is sourced from low risk fisheries and fisheries that are certified, in a FIP or targeting MSC certification.

Detailed questions were asked about the risk assessment process and sourcing outcome for seabass, salmon, cod and squid, including any risk reduction activities or improvement projects in place, supporting the decision to source.

- Farmed seabass (Turkey): MCS risk 3 for region but sourced from farm systems that are certified GlobalGAP, thereby reducing risk – especially in critical risk areas such as marine feed.
- Farmed salmon (from traceback: Norway): MCS risk 3 for the region but product is sourced from certified GlobalGAP farm (which covers feed), therefore risk is reduced
- Cod: MCS risk 2 (trawls and line caught). Sourced from an MSC certified fishery. No catch area (From Member: NE/ NW Atlantic; Russian, Barents & North Sea). MCS rating 2 – low. High risk of bycatch for redfish but an improvement plan is now in place, with annual progress checks by MSC.[40] Aligned with the Labelling Code and Sourcing Code. Claim: Our cod is responsibly caught in the NE or NW Atlantic.
- Squid (North Yellow Sea): Using information from Japanese stock assessments, the squid has an average Fishsource rating of 6.4 (acceptable with improvements required) and fish is fully traceable to vessel (Member H informed that the processor has their own fishing fleet so product is fully traceability). However, stock in Chinese waters is data deficient but fishery is now in a formal FIP, which is supported by Member.[41]

c) Traceability and transparency

Member H has full traceability from source to plate. To verify, two tracebacks were requested for two products – sea bass and salmon & cod cakes (three species), all of which supported responsibility claims.

Member H is transparent with general information on their sourcing policy and process available online, along with a short description of the SSC and how the business is applying the codes. A product list and a copy of the sourcing policy was available on request.

[40] MSC redfish. MSC surveillance audit, 10/2016. https://fisheries.msc.org/en/fisheries/norway-north-east-arctic-cod/@@assessments (Table 14.6, condition 6).
[41] https://fisheryimprovementprojects.org/fip/chinese-squid/

5.10.3 Assessment

Member H is operating in alignment with the SSC Labelling and Sourcing Codes.

5.11 MEMBER I

Three products were purchased and reviewed as part of the labelling review exercise, one of which was a mix containing three fish species. Only two of eight species listed in the species list (3.2.1) were available for purchase because the Member is a specialist trader in these two categories, the product sample was considered to be representative of their business offer.

5.11.1 Labelling review

Three products were purchased for review - warm-water prawns, cold water prawns and squid. No claims were used on any of the products

a) Product-specific claims

No claims – wild-caught

- Coldwater prawns: No claim; MSC certified (logo). Product sourced from MSC certified fishery (FAO 27 Barents Sea, Spitzbergen and Bear Island – Iab, IIb), meeting minimum requirements for sustainability or responsibility claims under the Labelling Code.
- Squid: No RASS or MCS ratings were found for species. Member I assessed as high risk and had an engagement plan in place but there was insufficient progress by supplier to improve fishery resulting in a decision to stop sourcing. Decision to stop sourcing is aligned with the Sourcing Code.

5.11.2 Sourcing review

An overview of the sourcing policy and decision making process is available online. Member I is a specialist trader and currently has over two thirds of their supply third party certified – a measure of best practice that also drives improvement at source.

Detailed questions were asked about brown shrimp and the warm water prawns and squid from their seafood mix.

a) Risk assessment and audit

Member I informed that they use a comprehensive responsible sourcing risk assessment tool that combines both an environmental assessment based on the principles of the European Fish Processors Association's (AIPCE) 'Principles for Environmentally Responsible Fish Sourcing risk assessment tool'. The tool enables Member I to determine the status of each fish species by supplier and fishing/farming method, and determines whether a species is approved for use (or not) using a low (green), medium (amber) and high (red) risk rating. There is an added black list where there are serious, unresolved concerns in relation to fishing activity, social and/or environmental welfare.

For farmed products, two risks assessments are conducted – one for the aquaculture production system and the other for feed. Suppliers are assessed against minimum requirements set out in Member I's responsible sourcing policy plus any additional qualities required by their customer (another business).

b) Sourcing decisions and responses

Sourcing policies cover food safety, traceability, farm & fishery sources, animal welfare, social standards & packaging. As best practice, Member I stated that where possible, they source from third party certified sources to help drive improvement at source. Where such certification is not yet possible, Member I supports fishery and aquaculture improvement programmes. In relation to feed, Member I only purchases where the source and capture methods of the fishmeal and fish oil supplying fisheries are identified.

- Warm water prawns (traceback conducted back to farming system in Thailand). Source farm is third party certified to GAA-BAP and includes feed traceability.
- Squid: Not currently certified - only a few small fisheries with FOS certification. Member was in discussions about developing a FIP and also working with credible third party about a fishery pre assessment but due to lack of progress, Member I decided to stop sourcing and change to another supplier that was already part of a FIP.

***c)* Traceability and transparency**

All fish sold by Member I is fully traceable back either to their approved catching vessel or approved groups of vessels and their landing ports. Nothing of unknown origin will be purchased.

A general sourcing statement and commitment to following the SSC Codes is on their website.

5.11.3 Assessment

Member I is operating in alignment with SSC Sourcing and Labelling Codes.

5.12 Member J

Three branded products were purchased and reviewed as part of the Labelling review. A representative from this business did not get in touch with the consultant during the review period so this analysis is limited to publicly available information only.

Member J has its own brand responsible sourcing standard and where indicated on pack, was considered equivalent to making a responsibility claim. From the website, their own-brand standard has a Code of Practice for Farmed Fish & Shrimp that requires all sources to be independently verified to GAA – BAP, GlobalGAP or ASC.

5.12.1 Labelling review

a) Product-specific claims

Responsibility claims – wild caught

- Cod: Own-brand responsibility logo; with MSC logo. Product is sourced from low risk fishery (NE Arctic & Norwegian Sea, MCS rating 2). Product is verified as MSC certified from website, meeting minimum requirements for sustainability or responsibility claims.
- Pink salmon: Own-brand responsibility logo. Product is sourced from low risk fishery (Alaska, MCS rating 1). Fishery is certified as responsibly managed for sustainable use to the Alaska FAO-Based Responsible Fisheries Management (RFM) Certification Programme, meeting minimum requirements for responsibility claims.

Responsibility claims - farmed

- Warm-water King prawns: Own brand responsibility logo. Product is sourced from farms in Vietnam, China and Thailand with high risk rating (MCS 5). Critical risk factor relates to sourcing and traceability of marine feed. Unable to verify source farm information to provide sufficient assurance that product is sourced in line with the Labelling Code and the Sourcing Code.

5.12.2 Sourcing information

Member J has a public commitment that all fish must meet a 'responsibly sourced and prepared' status within a specified timeframe.

5.12.3 Assessment

Two of three products sourced are aligned with the SSC Labelling and Sourcing Code. Information on source farm for warm-water prawns could not be verified to provide sufficient assurance that product meets requirements under the Labelling Code and Sourcing Code.

5.13 Member K

5.13.1 Labelling review

Three branded products were purchased and reviewed as part of the Labelling review exercise. As a specialist trader, Member K has a limited range of branded products but the species from the three products sampled—scampi, King prawns and cod—were representative of more than 95% of sales. Note: A fourth product – plaice goujons – available through the online retail site was included in the review but only as part of the sourcing review exercise.

a) Product-specific claims

- Cod: General sustainability claim: *"We source all sorts of sustainable seafood from the best locations around the world"*. Issue 1) Claims overreach. This statement is a general claim made on different products, including scampi. Not all seafood sourced is "sustainable", which would require all sources to meet require under the SSC code requires third-party certification. The term sustainable needs to be linked to sourcing. Terminology is therefore not in line with the Labelling Code. Product is sourced from low risk fishery (NE Artic I & II) with risk of redfish bycatch. Appropriate measures are in place to rebuild redfish stock, with monitoring plans in place. Product meets minimum requirements under the Sourcing Code.
- Scampi: General sustainability claim, as in cod product above. Terminology not in line with the Labelling Code. Product is sourced from low to medium risk fishery (ICES IVb, VIa, VIIa) using trawls. Member is involved in discussions to set up a FIP. Not aligned with the Labelling Code but aligned with the Sourcing Code.
- Warm-water prawns: No claims. Product is sourced from GAA-BAP certified farm systems 2* which does not include feed. Unable to verify source farm information to provide assurance that minimum requirements are met under the Sourcing Code.

5.13.2 Sourcing review

Member K has some general information available about scampi sourcing on their website. A copy of the sourcing policy was available on request and used for this exercise. This policy is specific to scampi,

which represents the majority of the Member's business but there is no written policy for remaining species.

a) Risk assessment

Member K has a sustainable scampi procurement policy that uses available information from MCS and RASS to generate a weighted average MCS score for scampi. An average score of 3.3 was the most recent score, which reflects the challenges in management and bycatch affecting the fishery. Nearly all scampi are sourced in areas that are MCS rated 2 and 3, with the exception of The Clyde Sea and Farn Deeps – both rated red by MCS.

All other species sourced are risk assessed as well, using information from RASS tool and MCS which are reviewed and compared.

b) Sourcing decision and appropriate response

If fisheries are high to medium risk, Member K looks for any improvements, reviews monitoring and evaluation plans and decides whether to source.

- Scampi: Member K is actively involved in efforts to improve the scampi fishery, which include campaigning for implementation of functional unit management across all scampi fisheries that they source from and working with fishermen to improve gear selectivity. Member K has identified the Irish Sea as critical to the viability of the fishery and has taken on an integral part of ongoing efforts to help deliver improvements. Product is sourced in alignment with the Sourcing Code.
- Warm-water prawns: Sourced from farms in Vietnam with GAA-BAP 2*certified farm systems (processing plant and farms). Unable to verify source farm information to provide assurance that minimum requirements are met under the Sourcing Code.

c) Traceability and transparency

A traceback was requested for scampi, which provided catch information to sub-level area and verified source information.

5.13.3 Assessment

From three products, there is a general sustainability claim listed on two products that is not aligned with the requirements under the Labelling Code. For warm-water prawns, information on source farm could not be verified to provide assurance that minimum requirements are met under the Sourcing Code. Therefore, two products are not aligned with the Labelling Code and one product is not aligned with the Sourcing Code (due to lack of verified information).

5.14 MEMBER L

5.14.1 Labelling review

Two relevant products were assessed of Member L's own brand products sockeye salmon and halibut. A review of halibut was conducted using electronic artwork supplied by the Member.

a) Product-specific claims

Neither of the two products used sustainability or responsibility claims but under minimum criteria set out in the SSC Codes, claims could have been used for both.

5.14.2 Sourcing review

Publicly available information on responsible sourcing is minimal on Member L's corporate website. When discussed with the Member during the Sourcing Code review, Member L informed that there are plans to develop a new website in 2017. On request, a copy of their sourcing policy was made available and used for this exercise. The two species reviewed in detail were halibut and sockeye salmon.

a) Risk assessment

A copy of Member L's sourcing policy was provided on request and for the Sourcing Code, a detailed discussion was had about the Members internal risk assessment with examples of questions asked, as well as the decision-making process. Member L stated that they have their own in-house risk assessment tool in place, which is informed by reputable sources of information such as the RASS tool and/or Fishsource, and checked against NGO sources like the MCS. It covers all elements required in the SSC sourcing code as well as additional parameters. Risk assessments are conducted for all new sources, followed by pre-sourcing audits and for all new suppliers, with evidence collected prior to purchase to ensure the operator meets the members sourcing policy. Prior to purchase, any engagement, monitoring and improvement actions are agreed with the new supplier and confirmed in writing with timebound deadlines and Key Performance Indicators.

b) Sourcing decisions and appropriate responses

Member L has a comprehensive sourcing policy that covers responsible sourcing, environment, people and quality. Where possible, Member L sources from fisheries and farms that are third-party certified – unless there is no certified fishery for that species, or the fishery/farm are unable to meet other sourcing criteria (e.g. quality, transport time).

For wild-caught fish, the member stated that wherever possible, they source from fisheries using low-impact methods such as pole and line, managed longline. Their sourcing strategy includes a review of the following: species stock status based on up to date credible science, fisheries management systems at all levels, bycatch records (and any associated mitigation measures), environmental impacts, NGO ratings for the fishery and related advice on required improvements. Member L stated that they insist their suppliers aim to reduce unwanted mitigation bycatch and use specific bycatch methods, wherever practical.

- Sockeye salmon – Wild caught from FAO catch area 67 – is produced from stocks fished in Alaska, certified under the Alaska Responsible Fisheries Management scheme, and MSC certified. Catch method is gillnets and seine nets (beach). Low risk certified fishery.

Member L requires all farmed fish suppliers to demonstrate that their minimum impact on the environment via the appropriate siting of cages, an Environment Impact Assessment and management plan, escape and transport plans, predator control plan, and Veterinary Health Plan in place, including best practice for animal welfare. For feed, where possible, Member L requires farm suppliers use third-party certified marine ingredients (e.g. MSC or IFFO RS). In addition, Member L reviews the use of other novel ingredients (palm oil, soya) and encourages the use of certified sources of these in farmed fish feed.

- Halibut – Farmed in Norway (open net) –Farm is GlobalGAP certified, with feed risk assessed and all sources fully traceable and MSC/IFFO certified. A detailed veterinary health plan is in place, which includes antibiotic use/control, animal welfare issues (methods of slaughter, feeding,

stress in transport). Reduced risk of sourcing with certified feed and farm management system in place (ISO certified), meeting minimum requirements under the Sourcing Code.

c) Traceability and transparency

Information on Member L's own brand products was not available on their website. A copy of the sourcing policy and artwork for the own-brand products was made available on request.

Member L stated that all products and fish must be traceable to source (e.g. the farm or vessel/group of vessels) and informed that they conduct regular checks to verify traceability. One traceback exercise was conducted for salmon, verifying that traceability systems are in place.

5.14.3 Assessment

Member L is operating in alignment with SSC Labelling Code and SSC Sourcing Codes.

5.15 Non-Member 3

Only one product – canned tuna – was reviewed for this business.

- Tuna: No claims on label. Product sourced from low risk fishery (Indian Ocean) using either pole & line or unassociated purse seine.

Product would be sourced in line with the Sourcing Code.

5.16 Non-Member 4

Only one product – canned tuna – was reviewed for this business.

- Tuna: No claims on label. Product sourced from Eastern Atlantic Ocean fishery using purse seine. Unable to verify if FADs were used in fishery, therefore source could be moderate to high risk (MCS rating 3 or 4).

On the basis of available public information only, the product would not meet minimum sourcing criteria under the Sourcing Code.

5.17 Non-Member 5

A total of four products were purchased for review – Atlantic cod and farmed warm-water prawns, farmed seabass and farmed salmon.

5.17.1 Labelling review

a) Product-specific claims

Responsibility claims - wild caught

- Cod: 'Responsibly sourced'. Product is sourced from low risk fishery (Iceland Va) using trawls. From MSC website, product is verified as MSC certified. Sourced from a low risk, third party certified fishery, the product would meet minimum criteria for responsibility claims under the Labelling Code, and would be sourced in line with the Sourcing Code.

Responsibility claims - farmed

- Warm-water prawns: 'Responsibly farmed'. Product sourced from farm system with GAA-BAP certification (2*). Unable to verify whether feed source was included in certification, to provide sufficient assurance that minimum requirements are met under the Sourcing Code, and for use of responsibility claims under Labelling Code. 'All (our) products are responsibly sourced protecting the surrounding marine ecosystem.' Labelling issue: Although use of a responsibility claim with reference to farmed products is in line with the SSC Labelling Code, as structured, the placement of the term 'responsibly sourced' in this claim refers to 'all products' – the verification of which was outside the scope of this project. The statement also denotes a causal relationship between responsible sourcing and the subsequent protection of the surrounding marine ecosystem, suggesting a greater benefit than could be attributed to this practice alone, which is misleading. [42] Terminology used would therefore not meet the requirements of the Labelling Code.

- Seabass: 'Responsibly farmed'. Product is sourced from Aegean Sea (Turkey). Unable to verify source farm information to provide assurance that minimum requirements would be met under the Sourcing Code, and for use of responsibility claims under Labelling Code. *'*Sea Bass fillets are farmed in the pristine clear waters of the [location given]. All products are responsibly sourced protecting the surrounding marine ecosystem.*'* Labelling issue: Although use of a responsibility claim with reference to farmed products is in line with the SSC Code, as structured, the placement of the term 'responsibly sourced' in this claim refers to 'all products' – the verification of which was outside the scope of this project. The statement also denotes a causal relationship between responsible sourcing and the subsequent protection of the surrounding marine ecosystem, suggesting a greater benefit than could be attributed to this practice alone, which is misleading. [43] Terminology used would therefore not meet the requirements of the Labelling Code.
- Salmon: Responsibility claim. 'Ecologically farmed in the pristine waters of Iceland' and ''[Our] salmon is farmed at low stocking densities in the pristine clear waters […], this stimulates the environment of wild salmon in a sustainably farmed manner.' Labelling issue: Claim 'ecologically farmed' would not be aligned with the Labelling Code. Claims can only use sustainability or responsibility and in relation to aquaculture, only claims of responsibility apply. Therefore, this claim would not be aligned with the Labelling Code. Labelling issue: Claim 'sustainably farmed' would not be in line with Labelling Code which does not allow for the term sustainability to be used with aquaculture. Therefore, this claim would not be aligned with the Labelling Code. Product is sourced from farms in Iceland from ASC and GAA-BAP certified farms, including traceability and sourcing of marine feed, and would be sourced in line with Sourcing Code.

[42] From Defra's Guidance on Environmental Claims, claims are misleading when it suggests a greater benefit than what it does/achieves. https://www.gov.uk/government/publications/make-a-green-claim/make-an-environmental-claim-for-your-product-service-or-organisation

[43] From Defra's Guidance on Environmental Claims, claims are misleading when it suggests a greater benefit than what it does/achieves. https://www.gov.uk/government/publications/make-a-green-claim/make-an-environmental-claim-for-your-product-service-or-organisation

5.17.2 Assessment

From four products bearing claims, one of four would be labelled in line with the Labelling Code, with three of four products using terms other than sustainability/responsibility that are potentially misleading and/or unverified. Two of four products would be aligned with the Sourcing Code. Source information for two of four products could not be verified and, based on available public information only, would therefore not be aligned with the Sourcing Code.

SUPPLIERS TO FOOD SERVICE

Members in this category sell product directly to other businesses. As a result, products were not available for purchase to assess against Labelling code, although a basic review of claims on their corporate websites was conducted for information only. To review species for assessment against the Sourcing Code, a range of species was selected for each business, based on highest volume/most important species with detailed questions asked.

5.18 MEMBER M

5.18.1 Labelling review - other claims

Member M operates as a small group of businesses across the UK through each of its four main depots.

There was minimal information provided on the corporate website in regards to sustainability and no claims were made in regard to sustainability that were specific to the business or to particular own-brand products. Note: Member M has informed that their corporate website is currently being updated.

There were no claims to assess against the Labelling Code.

5.18.2 Sourcing review

Fish is usually sourced in small quantities to meet local demand but some is bought at the group level to access better pricing. A copy of a sourcing policy dated 2013 and commonly held across the depots was available on request. Note: Member M has informed that this policy is currently being updated.

a) Risk assessment

Twice a year, source fisheries are assessed against sustainability requirements as outlined in the RASS tool and MCS guide. The preference is to select from fisheries that are MCS rated 1-3 or from certified fisheries and farms. Any products that are high risk do not have buying codes and can therefore not be purchased by buyers at any of the depots.

b) Sourcing decisions and appropriate responses

If the product is moderate risk (rated 4), Member M advises clients against species choice and tries to educate the customer on reasons against sourcing. If the customer still wanted to buy the fish, Member M informed that they source from the lowest risk fishery possible, one that uses the lowest impact catch method to minimise bycatch (and/or habitat impact).

Detailed questions were asked about plaice, haddock, scallops and mackerel.

- Plaice – In the summer, plaice is sourced from around the UK, primarily off the South Coast (a region associated with high risk by MCS). Catch method is mostly netted (fixed) and trawled. To

reduce risk, preferred sourcing is from fishery around Hastings (now MSC certified)[44]; and later in the year from December to May (spawning season), the fish is sourced from Iceland (RASS risk low, using Danish seines).

- Haddock is sourced 95% of the time from certified MSC fisheries in Iceland or Norway. Fish is also sourced from medium risk area around Scotland from a fishery that is MSC certified (although without chain of custody).[45] Risk of sourcing is reduced and meets minimum criteria under the Sourcing Code.
- Scallops – 90% is sourced from the US, with the source fishery located off the coast of Newfoundland and fished by dredging. The fishery is certified MSC and meets minimum criteria under the Sourcing Code.
- Mackerel – In the summer, fish is sourced from low risk dayboat fisheries along South Coast (using line caught method (MCS rating 2). After Christmas, fish is sourced from Scotland (nearly all of it is part of MINSA but not sold as MSC).

c) Traceability and transparency

The business provided a copy of their sourcing policy for review.

5.18.3 Assessment

Member M is operating in alignment with the SSC Sourcing Code.

5.19 Member N

At the time of assessment, Member N was still in the first year of SSC Membership with time remaining before they were expected to have both codes fully implemented. For information purposes only, they have been assessed against the Sourcing Code, and self-declared environmental claims used on their corporate website were reviewed against minimum criteria set out in the Labelling Code.

5.19.1 Labelling review - other claims

- *"…our fish are all responsibly sourced by the strictest standards…"*

Labelling Issue 1) Claim overreach. Not all wild-caught fish are third-party certified and at the time of review, the aquaculture policy and risk assessment process had not been created for farmed fish and therefore does not accurately represent the current situation. In addition, the reference to sourcing by the strictest standards in this situation should be reviewed and supported by information from benchmarking studies, NGO reports (or verification) etc.

This environmental claim is not aligned with the Labelling Code.

- *"…when you eat our fish you get the peace of mind that comes from eating a truly sustainable product that has been caught locally by British fishermen."*

[44] Hastings Fleet Dover sole and plaice. https://fisheries.msc.org/en/fisheries/hastings-fleet-dover-sole-and-plaice/@@view

[45] MSC certified – Scottish Fisheries Sustainable Accreditation Group (SFSAG) North Sea Haddock. https://fisheries.msc.org/en/fisheries/scottish-fisheries-sustainable-accreditation-group-sfsag-north-sea-haddock/@@view

Labelling Issue 2) Claim overreach. Not all fish sold are third-party certified (i.e. verified sustainable) and it is likely that not all are caught locally, resulting in a potentially misleading reference that all fish is sustainable and caught by British fishermen only. From the website, wild-caught fish is also bought directly from boats and from fish auctions. All fish sold at auction would have to be verified as local and British for this statement to be correct. Therefore, this claim is not in line with the SSC Labelling Code.

5.19.2 Sourcing review

Member N currently has a sourcing policy in place for wild-caught fish only, which it has prioritized as being most important to its business, electing to start with fisheries in and around the UK. Member N has identified about 20 local fisheries to be assessed by FOS, a certification that can be applied to small scale fisheries.

a) Risk assessment

Member N has a risk assessment process in place to identify areas in the supply chain that are in need of attention and improvement. The risk assessment includes the legality of fishing operations, certification, stock status, management (management and stock reference points, plans, monitoring and enforcement), and environmental impact (bycatch, habitat damage and species vulnerability).

b) Sourcing decisions and appropriate responses

If fisheries are high risk (red listed or major bycatch risk), Member N reviews the fishery to determine if improvements could be made and if so, how they could best be addressed. This results in additional research using the RASS tool and scientific information from ICES and/or CEFAS.

At present, Member N is working to increase certification of local species of which 20 are now FOS certified.

5.19.3 Preliminary assessment

Member N is not currently fully aligned with the SSC Codes but is working towards implementation. Prior to the end of this implementation phase, Member N should have an aquaculture policy in place that describes how sourcing decisions are made when purchasing farmed fish. In addition, a risk assessment of the most important/highest value species should be conducted, with a plan in place to review all other species sold.

Claims on the corporate website should also be revised to ensure it is in line with the Labelling Code.

6 CONCLUSIONS

From the 80 fisheries products reviewed, 71 were sourced in line with the Sourcing Code and from the self-declared environmental claims—43 were labelled in line with the SSC Labelling Code.

Key findings

Self-declared environmental claims were found on 52 of the products (48 responsibility claims and four sustainability claims). Of these, 43 or almost 85% were labelled as required under the Labelling code. Where products did not meet the minimum requirements, as was the case for nine non-Member

products, the incorrect use of sustainability/responsibility terminology (as set out in the Labelling Code) was responsible for five cases, the lack of verified information for three products and incorrect application of the sustainability claim for one product.

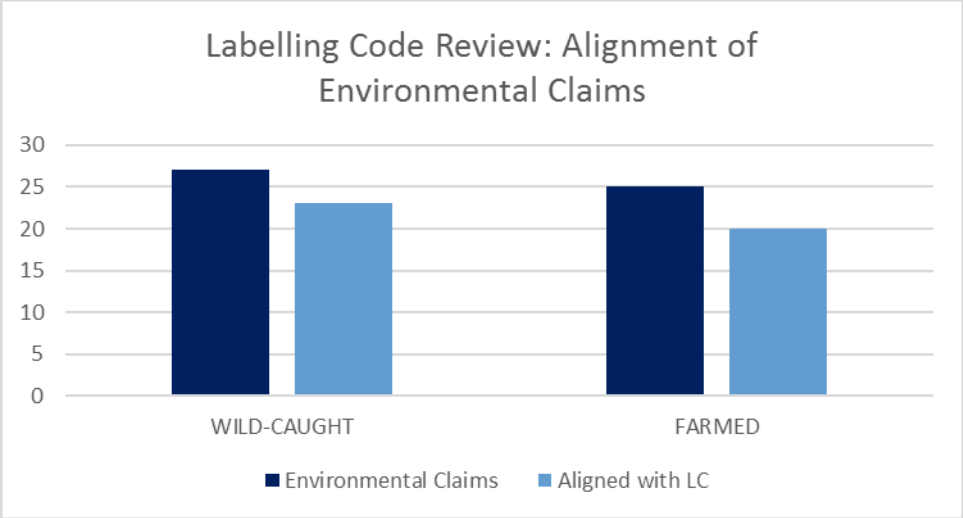

Figure 7. Alignment of environmental claims made on own-brand product with SSC Labelling code.

Of all 80 products sourced, 71 (89%) were sourced in alignment with the SSC Sourcing Code. The nine products that did not meet the requirements consisted of seven non-member and two SSC member products. In all cases, further information was required to assess and/or verify risk associated with source fishery or farm. Information on farming systems and the accreditations associated with the product's source farm was particularly challenging, with only general details available on corporate websites.

The study therefore found 17% of claims to be potentially misleading or unverified, compared to 32% at the time of ClientEarth's Labelling Report in 2011 – a 15% improvement.

7 RECOMMENDATIONS

7.1 RECOMMENDATIONS FOR SSC MEMBERS

7.1.1 Better on-pack consumer information

To use consumer guides like the MCS Goodfish Guide, basic information on catch area and method needs to be provided for consumers to look up species and associated risk. With a few notable exceptions, however, information on catch area was often too general (e.g. Pacific Ocean) or missing entirely. Given that many businesses reviewed have a commitment to providing consumers with the information required to make informed decisions, it is recommended that sufficient information is provided to allow consumers to use seafood guides.

7.1.2 Extension of improved consumer information to online shopping sites

The product information available online regarding catch area and method were no more detailed than information provided on-pack. Opportunities to better link the online retail site to sustainability pages

on the corporate website (not the general access page but one directly linked) as well as to fisheries information should be further explored by all SSC Members where applicable.

7.1.3 Better consumer contact details for sustainability inquiries

During this study, the Consultant made several inquiries via the customer helplines for more detailed information on catch or catch method *only* where such information was readily available and easy to find. The idea behind the inquiries was to understand the experience of the average consumer.

Ideally, freephone information or email addresses should be made available on pack, along with clear references to information that is needed to make the inquiries. Where space is limited, the website address provided should be direct to the inquiry page (or to the seafood sustainability site).

7.1.4 Availability of responsible sourcing approach online

While the commitment of SSC Members to improving fisheries sustainability is evident to those familiar with the SSC and its Members, it is not always easy to find comprehensive information on policies, practices and/or any other initiatives (such as the SSC) that very clearly demonstrate and provide evidence of this commitment. Even if relatively few people actually access this information, it is best practice for companies to be transparent and to provide access.

7.2 RECOMMENDATIONS FOR SSC

7.2.1 Application of Codes to 'own-brand' products only – review required

The application of the Sourcing Code to 'own-brand' products is most appropriate for retailers and brands with a large portfolio of own-brand products that are also representative of their business overall. Where 'own-brand' production is only a very small part of the business and/or only represents a few of the species sourced and traded, it is unclear whether this is still appropriate. It is the opinion of the Consultant that application of the Sourcing Code should be in line with the spirit of the SSC, which is to say that responsible sourcing behaviour should apply to the majority of fish and seafood products that the company is directly responsible for, regardless if it is processed for another business or under their own-brand. It is therefore recommended that the SSC reviews the terms of Code application across Membership to ensure that the integrity and credibility of the Coalition remain intact.

7.2.2 Review of application of Dolphin Safe label

The Consultant recommends for a more detailed investigation to be conducted on the application of the Dolphin Safe label to Skipjack tuna, and against the terms set out in the Labelling Code.

ANNEX A – MCS AND RASS RATING SYSTEMS

MCS Goodfish Guide – Risk Assessment and Rating System

The rating system has been developed by the Marine Conservation Society as advice for choosing the most environmentally sustainable fish. Scores are generated through an assessment of a range of sustainability criteria – stock status; vulnerability of the species to fishery impacts; management; ecological impacts of capture method and accreditation or certification.

1. Very low risk – Best choice: Associated with the most sustainably produced seafood.
2. Low risk – Good Choice: Although some aspects of its production or management could be improved.
3. Moderate risk – Acceptable as occasional choice: Not considered entirely sustainable. Fisheries or production methods are likely to require improvements in either stock levels or management practices and some (significant) uncertainty may surround their production.
4. High risk – Eat only very occasionally, seek alternative options. Fishery is some way from being sustainable at this time. These fisheries or farming methods are likely to have a number of significant environmental issues and uncertainties associated with their production. Improvements are needed to address the specific issues of concern.
5. Very high risk – Avoid eating: Species is considered (all or most of the following apply): vulnerable to exploitation and/or assessed by the World Conservation Union (IUCN) as threatened from overfished stocks and/or stocks where data is deficient from poorly managed or unregulated fisheries caught using methods which are detrimental to other marine species and habitat.

RASS tool

The Risk Assessment for Sourcing Seafood (RASS) tool was developed by Seafish to provide seafood buyers and processors with up-to-date and structured information on environmental risks when sourcing seafood. A key feature of RASS is that it will present risk scores for four themes:

1. stock status
2. stock management
3. habitat impact, and
4. bycatch impact (hereafter referred to as mechanisms).

Seafish have developed the RASS scoring mechanisms and an online tool for disseminating this information to our key stakeholders.

ANNEX B– MANDATORY LABELLING REQUIREMENTS

The Common Fisheries Policy package includes the Fish Labelling Regulations, Fisheries Control Regulation and The Common Organisation of the Markets in fishery and aquaculture products (CMO).

The CMO (EU) No 1379/2013 sets out the mandatory information that must appear on unprocessed fishery and aquaculture products within the CN03 customs commodity code, irrespective of their origin or of their marketing method. It contains fish and shellfish that do not have any other ingredients (other than salt) that are whole, gutted, minced, frozen, dried, salted or smoked. These products may only be offered for sale to the final consumer if the labelling requirements are met. Information required under the CMO that is of relevance to this assessment includes:

- The commercial designation of the species and its scientific name;
- The production method.
- The area where the product was caught or farmed, and the category of fishing gear used.

- Whether the product has been defrosted.
- The date of minimum durability.
- Additional voluntary information.

Further information may be given on a voluntary basis provided it is 'clear and unambiguous'. While there is a legal requirement that no voluntary information will be displayed if it cannot be verified, there is no further guidance of what is considered clear and unambiguous. The SSC Labelling Code helps provide some consistency in this space.

ANNEX C – THIRD-PARTY CERTIFICATIONS

The SSC guidance gives detail on the standards a third-party certification must meet in order to make a sustainability claim on wild capture products:

- An independently audited chain of custody is in place to trace the fish to its source fishery;
- The source fishery is monitored at least every two years through a surveillance audit and fully reassessed every five years by independent auditors;
- The source fishery is consistent with the principles of relevant key international standards and codes of conduct is operated in a manner consistent with the principles of the FAO Code of Conduct for Responsible Fisheries;
- Where relevant, the use of labels is consistent with the relevant International Organisation for Standardisation (ISO) standard guidelines on product labelling;
- Without prejudice to requirements for bodies operating conduct certification systems, the standard and audit are transparent and participatory, open to formal input and review, and provides opportunity for stakeholder comment and objection;
- Audits are performed by independent auditors that are accredited to a standard recognised by international accreditation meeting, at a minimum; and
- Any certification is consistent with the FAO guidelines for the eco-labelling of fish and fishery products from marine capture fisheries.

ANNEX D – SPECIES RISK PROFILE

The species profiles below provide context on the risk rating, risk mitigation and improvement activities undertaken by SSC Members. Note: ALL Information was taken directly from the MCS Good Fish Guide and RASS tool.

1. Wild-caught Skipjack tuna

Skipjack tuna (*Katsuwonus pelamis*) is found in tropical and warm temperate waters in the Atlantic, Pacific and Indian oceans. The stock is considered to have relatively low vulnerability to overfishing and relatively good stock health. Pole and line and troll fisheries rated low risk or 1-2 respectively on RASS and MCS.

Risks - Bycatch

Bycatch is the biggest risk associated with skipjack tuna, particularly in gillnet and purse seine fisheries associated with Fish Aggregation Devices (FADs). Both catch methods are known to result in bycatch of juvenile tuna as well as shark, sea turtles and other fish.

- Most purse seine fisheries (particularly if using FADs) are rated 3-4 on MCS; with RASS medium-high risk on bycatch but low risk on other aspects.

Risks – Management

Skipjack tuna is managed by a range of different Regional Fisheries Management Organisations (RFMOs) depending on where they are located[46] but similar to other tuna species, the wide range of Skipjack and access by numerous countries makes effective management difficult. There is no Total Allowable Catch (TAC) set for the species, only recommendations from the relevant RFMO that catch and effort do not exceed current levels. Data deficiency is a problem in gillnet fisheries in particular, as these are largely unmanaged and lack adequate monitoring.

Certified Fisheries

- The Maldives pole and line - skipjack & yellowfin tuna
- Tri Marine Western and Central Pacific skipjack & yellowfin, surrounding nets with purse seines (Eastern/Western Central Pacific)
- PNA Western and Central Pacific skipjack & yellow fin, unassociated/non-FAD purse seine

2. Wild-caught Atlantic cod

Atlantic cod (*Gadus morhua*) is one of the top five species of fish consumed in the UK. With the exception of cod from the Northeast Arctic (I & II), Iceland and Eastern Baltic, Atlantic cod fisheries are below a sustainable limit and rated as 'high risk' by the MCS because they are overfished, inefficiently managed or at an unknown level. OSPAR[47] has also listed stocks in II and III as a 'threatened and declining species' and the IUCN has rated stocks in the Greater North Sea and Celtic Sea as 'vulnerable'. Efforts are in place for recovery in some areas such as the Skagerrak, North Sea, and Eastern Channel, and stocks are slowly showing signs of improvement, but mortality is still too high and fishing unsustainable.

Risk - Bycatch

ICES has recently identified that there is high risk of bycatch for golden redfish (*Sebastes norvegicus*) and Norwegian coastal cod in gillnet and demersal otter trawl fisheries[48]. To date, regulatory measures have not been able to control bycatch and as a result, redfish is now outside safe biological limits. A working group established in 2014 have proposed a number of regulatory changes to rebuild redfish, with progress reports to be reviewed at each MSC surveillance audit.[49]

Low Risk

Overall, cod from NE Arctic (I&II), Iceland and Eastern Baltic region is considered low risk.

[46] Some of the RFMOs that manage skipjack stocks relevant to this study include: International Commission for the Conservation of Atlantic Tunas (ICCAT), Western and Central Pacific Fisheries Commission (WCPFC), and Indian Ocean Tuna Commission (IOTC)

[47] OSPAR is the mechanism by which 15 Governments & the EU cooperate to protect the marine environment of the North-East Atlantic. It produces a list of threatened and declining species in the North-East Atlantic.

[48] ICES note – July 2016

[49] MSC surveillance audit, 10/2016. https://fisheries.msc.org/en/fisheries/norway-north-east-arctic-cod/@@assessments (Table 14.6, condition 6).

Certified Fisheries:

- Norwegian NE Arctic offshore cod fishery – range of fishing gears
- Barents Sea demersal trawl cod fishery within Norwegian and Russian EEZ and in international waters.
- Eastern Baltic: Danish and Swedish fisheries.
- Iceland EEZ: longline, handline and Danish seine fishery for cod in Iceland's EEZ.

3. Wild-caught flatfish – plaice and sole

Plaice – North Sea (IV)

Plaice is subject to high fishing pressure, but stock health is good in most fisheries except the Celtic Sea (rated high risk on RASS and 4-5 by MCS), the Western English Channel (rated 4 on MCS). In the North Sea, the stock is healthy and fishing is at a sustainable level but there is a high risk of bycatch – Danish seines are the most sustainable capture method.[50]

Risk – Bycatch

- Bottom trawling (demersal otter): high risk of bycatch and high proportion of discards (approx. 30-40% - mainly dab and plaice, followed by haddock, cod and whiting) Bycatch risk includes two prohibited species - common skate and spurdog.
- Beam trawling: Very high risk of bycatch (> 50% of catch weight), which consists of sharks, skates and rays (including potentially threatened, endangered or protected (TEP) species).
- Demersal seine nets: Poor selectivity and high risk for a wide variety of bycatch, mainly plaice plus other species including saithe, haddock, Atlantic cod, plaice, whiting, hake and dab. [51]

Mitigation: Gear selectivity devices such as Swedish Grids, large-mesh square panels and separator panels help to prevent catches below the minimum landing size of 27cm for North Sea Plaice and control linking mesh size and effort limits for individual vessels.

Risk - Habitat

Bottom trawling methods to catch plaice and sole are often associated with damage to vulnerable or sensitive seabed habitats, automatically resulting in a higher risk ratings (MCS). However, damage is likely to be minimal if fishing occurs within core fishing areas (typically historically fished ground).[52] Adjustments to fishing gear are increasingly being introduced to reduce habitat impact.

Lemon sole - North Sea (IV)

In the North Sea, lemon sole is mainly taken as bycatch in a demersal otter trawl fishery for mixed species.[53] The stock is data limited but is considered to have moderate resilience to fishing exploitation and a relatively stable population trend. It is rated as a moderate risk – MCS rating 3 and RASS scores of

[50] MCS – sustainability overview for plaice, North Sea and Skaggerrak (IV and IIIa).
[51] RASS – bycatch risk for plaice in North Sea (IV), otter trawl.
[52] RASS – habitat risk for plaice in North Sea (IV), otter trawl
[53] RASS – overview for lemon sole, North Sea, Skagerrak-Kattegat, and E. English Channel

3 across all categories except for habitat, where it has a mod-high risk. Note: This fishery is now a FIP under Project UK.[54]

Risk – Management

Lemon sole stocks are largely unmanaged in EU waters, with the exception of the North Sea (IV), Skagerrak- Kattegat (IIIa), and Eastern English Channel (VIId). The North Sea stock is managed along with the Norwegian Sea (IIa) under a combined species Total Allowable Catch (TAC) for lemon sole and witch flounder (*Glyptocephalus cynoglossus*). It has been noted that the use of combined TACs may not be appropriate for stocks mainly taken as bycatch and may also prevent effective control of single-species exploitation rates, potentially leading to overexploitation of either species (RASS – management risk).

Risk – Habitat

The RASS rating for habitat is mod/high for otter trawling because there is potential for significant habitat impact if fishing outside of core areas. However, it is considered safe to trawl where the substrate is mostly sandy or muddy sand. [55]

Yellowfin sole – Northeast Pacific (FAO67)

Yellowfin sole is part of a mixed flatfish fishery that is not subject to overfishing and is not currently overfished.[56] It is one of five flatfish species that is MSC certified under the Alaska (Bering Sea and Aleutian Islands (BSAI)) flatfish fishery. Despite the certification, the MCS rating is 3 due to the risk of bycatch for several species, including Pacific halibut and prohibited species such as red king and snow crab. There are limits on the amount of halibut and crab that can be caught incidentally in this fishery. If these limits are exceeded, the fishery is closed.

4. Wild-caught cold-water prawns

The Northern prawn, or cold-water prawn (*Pandalus borealis*), has a wide distribution throughout the North Atlantic and North Pacific oceans. North East Atlantic stocks are relatively healthy and rated as low- to moderate-risk in most areas and high-risk in some areas in Canadian waters (Shrimp Fishing Areas 6 & 7).

Risks - Bycatch

There is a moderate risk for bycatch of several species such as saithe, cod, sharks, etc. Mandatory sorting grids are used in all North Atlantic cold-water prawn fisheries to avoid bycatch of juvenile cod, haddock, small shrimps, Greenland halibut, etc., which could otherwise make up to 30% of the landed catch. There are temporary closures of fishing areas where high bycatch is occurring.

Risks – Habitat

Demersal Otter Trawl fisheries are rated as moderate-risk on RASS for habitat damage. Damage is mitigated through gear technology and prohibition of fishing in some areas to protect marine life.

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[54] North Sea lemon sole, mixed gear. http://www.seafish.org/industry-support/fishing/project-uk/project-uk-fisheries-improvements/north-sea-plaice-lemon-sole-mixed-gear-fip

[55] RASS habitat risk for lemon sole in North Sea, Skagerrak-Kattegat, and E. English Channel, otter trawl

[56] MCS overview for yellowfin sole, FAO 67

Risks – Management

Some areas are regulated by Total Allowable Catch (TAC) while others are not. Areas with no TAC are regulated by effort control, licensing, or a partial TAC (Russian zone only). Management controls have not been completely effective in protecting some stocks from overexploitation.

Certified fisheries

- Norwegian North East Arctic and North West Atlantic cold-water prawn fisheries.
- MSC fishery 50571 covers: Canada northern and striped shrimp (Shrimp Fishing Area (SFA) 1-7), Canada Scotian Shelf Northern prawn trawl (13-16), Gulf of St. Lawrence northern shrimp trawl fishery Esquiman channel (8). NOTE: High risk for SFA 5&6.

Pandalus jordani – Northeast Pacific

No MCS profile. For Canadian EEZ, RASS rated the fishery as moderate risk due to the low maximum vulnerability score but the stock in good condition based on the most recent sampling.[57] The US EEZ (excl. Alaska) is rated as low risk.[58] For both, bycatch and habitat is moderate risk but mitigation efforts in both areas have also reduced risk.

Risk – bycatch

Risk of bycatch for all areas using trawls is moderate. Within the Canadian EEZ, bycatch grates and large mesh panels have significantly reduced the bycatch of larger non-target fish. However, bycatch of small-sized non-target species has been highlighted as a concern, particularly for the endangered eulachon – although bycatch has diminished significantly over the last 10 years.

Within the US EEZ (excl Alaska), bycatch is low (maximum of <6% of total catch weight) due to mitigation efforts made by all vessels in the fishery using bycatch reduction devices such as, fitting artificial (LED) lights on demersal otter trawls (RASS - bycatch). However, there is a risk of catching a few prohibited species: Canary Rockfish, Thornyheads and Yelloweye Rockfish.

Risk - habitat

The potential risk to habitat is moderate because demersal otter trawls could have significant impact on the seabed but all vessels in the fishery have taken steps to mitigate (RASS - habitat). This involves using gear technology and closing of over fifty areas to protect vulnerable marine habitats.

5. Wild-caught crustaceans – Scampi

The Norway Lobster (*Nephrops norvegicus*) also known as langoustine or scampi, is present in the North East Atlantic – from Iceland to North Africa and in the Mediterranean – with stock health varying among populations. MCS rates demersal otter trawl fisheries of the North Sea including Farn Deeps (ICES IVb) as high risk (5); and other areas including Devil's Hole and Off Horn reef (ICES IVb), Norwegian Deep and Noup (ICES IVa), and some areas of West Scotland (ICES VIa) all rated 4 by MCS.

Risk – Catch Method (trawls) & bycatch

Large quantities of bycatch are associated with trawl (demersal otter trawl) fisheries including juvenile fish, small Nephrops below the minimum landing size, and overfished species such as cod, haddock and

[57] RASS – Stock status for Pandalid shrimps inside the Canadian EEZ (Pacific), otter trawl
[58] RASS – Stock status for pink shrimp (Pandalus jordani) in the USA EEX excl. Alaska, otter trawl

whiting. Trawl fisheries are rated as high- or very high-risk for bycatch. Pots or creels are a preferred method of fishing since bycatch is not an issue.

Mitigation: separator grids and larger meshes also increase selectivity and reduce bycatch / discards. In 2012, most vessels operating in ICES Division IVa and the Farn Deeps fished exclusively with specialized gear that reduced cod bycatch by 60% (by weight).

Risk – Management

At present, fishing quotas apply to entire sea areas but scientific advice suggests that management should be implemented at an individual fishing ground level or Functional Unit (FU) level to keep exploitation in line with the size of local populations. However, as there is no localized management of stocks, boats are fishing across functional units resulting in the overfishing and depletion of some Nephrops populations. Effective management at a functional unit level will require co-operation across nations, purchaser organisations and the EU.

Risks – Habitat

Habitat risk is scored as high or very high for most trawling fisheries and the Convention for the Protection of the Marine Environment of the North-East Atlantic (OSPAR) and UK Marine Acts provide a process to designate Marine Protected Areas.

Low risk and Certified Fisheries

- Danish and Swedish demersal otter trawl in ICES Division IIIa was certified as a responsible fishery by the Marine Stewardship Council (MSC) in January 2015.
- Low-risk fisheries (MCS rating of 2) are the pot or creel fisheries in West of Scotland and demersal otter trawl fisheries in the Irish Sea, East (ICES VIIa) and West of Scotland.

6. Farmed warm-water prawns – King prawns

The King prawn (*Penaeus vannamei*), or whiteleg prawn/white shrimp, is a native species of the Eastern Pacific coast. Intensive prawn farming is associated with several negative environmental impacts and MCS automatically scores all intensive pond systems as high-risk (red rated) citing the supply of fishmeal and fish oil as a critical risk where it is not traceable to species level or certified as sustainable. These ratings are applied at a country/regional level and do not capture the diversity of farming and production practices in place that reduce environmental risk.

Risk – Source of Marine Feed Stock

The source of fishmeal and fish oil in marine feed stock is a critical risk associated with prawn farming, especially with regard to supply of wild-caught feed. Efforts are in place to improve traceability of feed through responsible sourcing schemes like the International Fishmeal and Fish Oil Organisation (IFFO) as well as to improving the sustainability of the feed meal / fish oil fisheries through improvement projects. Where marine feed ingredients are sourced from certified sources, resulting in supply chain certification, MCS rate as medium risk (3).

Risk – Habitat

Intensive pond farming systems stock prawns at higher densities and results in significant risks for ecologically sensitive habitats including: the risk of salinisation of freshwater bodies; release of organic

matter and nutrients leading to environmental changes; the use of therapeutics and chemicals in production; and the potential of disease transfer between farmed and wild prawns.

Risk – Management

Concerns exist with the current regulatory frameworks and the amount of enforcement for aquaculture production in some countries. Third-party certification systems and other independently assured standards reduce sourcing risk by using production standards and systems to address many of the environmental risks.

Certifications

- Closed, land-based farming systems in the UK and organic certified farms are low risk (MCS rating – 1).

Intensive pond systems that are certified to one of the below standards reduce environmental risk associated with production and where feed is included, provides assurance across the supply chain:

- Aquaculture Stewardship Council (ASC) accreditation, includes feed
- Global Aquaculture Alliance certification standards for Best Aquaculture Practice (GAA-BAP) – with 2*3*4* to indicate implementation across supply chain (i.e. processing, production, hatchery and feed) with 4* products the best choice to make.
- GlobalGAP

7. Farmed fin-fish – sea bass (or sea bream)

Sea Bass - farmed

Sea bass is widely cultured in Mediterranean areas, with Turkey and Greece the biggest producers in Europe. MCS automatically rates aquaculture farms as a med-high risk – 4.

Risk – Habitat

The bulk of sea bass farming occurs in open net pens (cages). Environmental concerns associated with open net pen farming include pollution from nutrients and organic matter; escaped farmed fish; non-indigenous farmed fish acting as pests in local communities; use of chemicals and antibiotics in production; and interaction with, and disease transfer to, local wildlife.

Certified Farms

- Global GAP certified open net pens are ranked as moderate risk by MCS (3).
- Organic standards for Gilthead Bream lead to lower environmental risks and MCS 2 rating.

Gilthead Bream - farmed

Turkey is a key producer of farmed sea bream. Bream farmed in open net pens causes some environmental concerns, which include: pollution from both nutrients and organic matter that lead to environmental changes; escaped farmed fish; disease transfer between farmed and wild species; widespread use of chemicals; and some remaining concerns surrounding enforcement and regulatory controls.

- Land-based tanks (recirculating aquaculture systems) used in France have the lowest environmental impact, and are rated as sustainable (MCS rating of 1).

8. Farmed and wild-caught oily fish - salmon

Wild-Caught Pacific salmon – Pink and Sockeye

All wild salmon (pink, chum, coho, sockeye and Chinook) caught off Alaska is from fisheries certified to the FAO-Based Responsible Fisheries Management (RFM) Certification Programme as responsibly managed for sustainable use. The Alaskan pink salmon fishery is rated by the MCS as low risk (1) and Sockeye is rated 2 – low risk.

Risk – Bycatch

Bycatch risk is low to moderate for salmon fisheries in Alaska, with the main bycatch species likely to be other species of salmon which are all closely monitored and managed. There are low bycatch rates of non-salmonids due to the gear used and the seasonality (RASS).

Certified fisheries

- Alaskan salmon – including pink, chum, Coho-silver and sockeye in Northeast Pacific (all gear)
- Delta Kamchatka – including pink, chum, Coho, silver and sockeye
- Iturup Island - Pink and chum salmon; Ozernaya River - Sockeye salmon (seines and beach nets)

Farmed Atlantic Salmon

Farming systems that use open net pens in the sea cause environmental concerns such as pollution from nutrients and organic waste, use of chemicals and treatments for sea lice, and escaped farmed fish, resulting in a moderate risk rating from MCS (3). Habitat loss and degradation, particularly in spawning grounds, threaten wild salmon populations.

Risk – Marine Feed Stock

Salmon are carnivorous fishes whose feed stock includes marine sources of fishmeal and fish oil. In some regions, sourcing of these ingredients leads to environmental degradation, destructive fishing practices and/or human rights issues in the source fishery. To mitigate these issues, marine feed ingredients should be fully traceable back to well-managed or certified fisheries[59]. Other sources of protein, such as fish trimmings and plant based protein from soya, are also used to decrease reliance on whole fish from wild capture fisheries.

Certified Farms

- GlobalGAP certified open net pens for farmed salmon are ranked as moderate risk by MCS (rating of 3).
- Organic standards for farmed Atlantic salmon include hatchery and feed production and lead to lower environmental risk (MCS rating of 2).

ANNEX E – PRODUCT INFORMATION AND CLAIMS (TABLES 1 – 9)

[59] The International Fishmeal and Fish Oil Organisation (IFFO) has a responsible sourcing scheme for feed source fisheries.

Table 1: Product information & claims for wild-caught Skipjack tuna (*Katsuwonus pelamis*)

Brand & Product *(Scientific name)*	Catch Area & Catch Method	Claims & Logos (plus customer information)	Risk Assessment Considerations & Alignment with SSC Codes
NON-MEMBER 3: Tuna chunks in water	Indian Ocean. MCS rating - 2	No claim. Dolphin Friendly (logo).	Skipjack tuna CUSTOMER INQUIRY re catch method.
	No catch method *(From website: pole & line OR purse seine-no FADs).*	Customer info: address and website link to track product.	No claims. Sourced from low risk fishery. **Aligned with SC.**
NON-MEMBER 4: Tuna steak in brine	Atlantic Ocean *(Eastern)*	No claim. Dolphin Safe (logo).	CUSTOMER INQUIRY by email & phone. MCS rating - 3 (no FADs) or 4 (with FADs).
	No catch method *(From website traceback - purse seine).* MCS rating 3 or 4	Customer info: address, careline, website.	No claims. Unable to verify risk of source fishery – either 3 or 4. **Not aligned with SC (See section 5.16.2).**
NON-MEMBER 1: Tuna chunks in brine *(Katsuwonus pelamis)*	Pacific Ocean *(From ODP: Eastern or Western and Central; all rated as well-managed)*	No claim.	CUSTOMER INQUIRY re catch area and method – no response received. From ODP, source fishery is well managed.
	No catch method *(From website, FAD free).* MCS rated 2 or 3.	Customer info: address, careline, website.	No claims. Sourced from well-managed fishery (ODP). **Aligned with SC.**
MEMBER A: Tuna steak in water	Maldives (Indian Ocean). MCS rating – 1 (low risk).	Claim: Sustainably sourced. MSC logo (MSC – 51896)	WEBSITE VERIFICATION From MSC certified fishery – verified on MSC product finder site.
	Pole and line.	Customer info: address.	Sustainability claim. Sourced from a low risk, third party certified fishery. **Aligned with LC and SC.**
MEMBER B: Tuna steak in water	Central-Eastern Atlantic Ocean (FAO 34) MCS rating – 2 (low risk).	No claim. Dolphin friendly (logo).	Low-risk fishery & method.
	Pole and line.	Customer info: address.	No claim. Sourced from low risk fishery. **Aligned with SC.**
MEMBER C: Tuna chunks in brine	Central-Eastern Atlantic (FAO 34). MCS rating – 2 (low risk).	No claim. Pole & line caught (logo).	Skipjack tuna Low-risk fishery and method.
	Pole and line.	Customer info: address, website, careline.	No claim. Sourced from low risk fishery. **Aligned with SC.**

MEMBER D: Tuna chunks in water	Maldives (Indian Ocean).	Claim: Responsibly caught; Responsibly sourced - use traditional pole and line to minimise impact on enviro and other marine life. Dolphin Safe (logo).	Skipjack tuna WEBSITE VERIFICATION From MSC certified fishery - verified on MSC product finder site.
	Pole and line. MCS rating – 1 (low risk).	Customer info: website.	Responsibility claim. Sourced from low risk, third party certified fishery. **Aligned with LC and SC.**
MEMBER E: Tuna in brine (*Katsuwonus pelamis*)	Western Pacific Ocean WCPO – FAO 61, 71, 77.	Claim: Responsibly sourced (general claim re pole & line). Logos: Dolphin Safe; Caught one by one using pole & line.	Low-risk fishery and catch method. MCS – 2.
	Pole and line. MCS rating – 2.	Customer info: address, careline.	Responsibility claim. Sourced from low risk fishery. **Aligned with LC and SC.**
MEMBER F: Tuna chunks in water	Atlantic Ocean (FAO 34)	Claim: Responsibly sourced. General RS statement.[60] Dolphin safe logo	TRACEBACK Low risk source (MCS rating – 2)
	Pole and line. MCS rating – 2.	Customer info: address, website, careline.	Responsibility claim. Sourced from low risk fishery. **Aligned with LC and SC.**

Table 2: Product information & claims for wild-caught Atlantic cod (*Gadus morhua*)

Brand & Product *(Scientific name)*	**Catch Area & Catch Method**	**Claims & Logos (plus customer information)**	**Risk Assessment Considerations & Alignment with SSC Codes**
MEMBER A: Prepared cod fillets – frozen *(Gadhus morhua)*	NE Atlantic (*From MSC website - Iceland Va).* MCS rating – 2.	General claim: Our frozen fish is the same as our fresh fish, always responsibly sourced. MSC (logo).	WEBSITE VERIFICATION From MSC certified cod fishery - verified on MSC product finder site.
	Line caught. MCS rating – 2.	Customer info: address and website.	Responsibility claim. Sourced from a low risk, third-party certified fishery.

[60] Member F has a general responsibility statement that is used on wild fish: *All our wild fish is responsibly sourced – approved using independent scientific advice*. It is listed as 'general RS statement' throughout the Tables.

			Aligned with LC and SC.
MEMBER B: Cod fish Fingers *(Gadhus morhua)*	NE Atlantic: Barents Sea or Norwegian Sea, ICES subarea 1 & II. MCS rating - 2	Claim: Responsibly sourced (logo).	Low risk fishery with high risk of bycatch for redfish. To mitigate - there is an improvement plan in place to rebuild stocks, with progress reviewed in MSC surveillance audits.
	No method listed. RASS risk high for redfish bycatch (gillnets and trawl).	Customer info: address.	Responsibility claim. Sourced from low risk fishery with monitored improvement plan in place to reduce bycatch. **Aligned with LC and SC.**
MEMBER C: Cod fish fingers – frozen	No catch area (*from inquiry: Barents Sea, Norwegian Sea or Russian).* MCS rating – 2.	No claims.	CUSTOMER INQUIRY by phone re catch area. Sourced from low risk fishery with possible high-risk of bycatch.
	No method listed. Potential bycatch risk for redfish.	Customer info: address, website, careline number.	No claim. Sourced from low risk fishery with monitored improvement plan in place to reduce bycatch. **Aligned with SC.**
MEMBER D: Cod fish fingers – frozen	NE or NW Atlantic *(From traceback – FAO 21 NAFO 3K).* RASS rating – high.	Claim: Made with pieces of responsibly sourced cod.	TRACEBACK to subarea NAFO 3K. *(From Member: fishery is in a FIP)*. Biomass is improving but stock status remains critical; technical and spatial measures in place to reduce bycatch.
	(From traceback: Mainly hooks; some use of nets) Moderate by-catch risk (RASS).	Customer info: address.	Responsibility claim. Sourced from high risk fishery but improvements/ risk reduction efforts via FIP. **Aligned with LC and SC.**
MEMBER E: Cod fish fingers – frozen *(Gadus morhua)*	Barents Sea, Norwegian Sea or Iceland Grounds. (*From MSC website – Norway, NE Arctic cod).* MCS rating – 2 (low).	Claim: Made with responsibly sourced cod, line caught; Responsibly sourced [fish] fingers made with 100% MSC cod fillets. MSC logo (MSC-C-50544).	WEBSITE VERIFICATION From MSC certified cod fishery – verified on MSC website. Low risk fishery and method.
	Hooks & lines. (RASS rating – low risk)	Customer info: address and phone number.	Responsibility claim. Sourced from low risk, third party certified fishery. **Aligned with LC and SC.**
MEMBER F: Cod fishcakes	NE Atlantic -FAO27 *(from email inquiry – Barents, Russian,*	Claim: Responsibly sourced fish. General RS Statement.	CUSTOMER INQUIRY Email inquiry regarding sub-area (x2). High risk of redfish bycatch but an

(Gadus morhua)	*Icelandic).* MCS rating – 2.		improvement plan is now in place, with annual progress checks by MSC.
	No method listed. *RASS – high risk of redfish bycatch*.	Customer info: address, website, email and careline.	Responsibility claim. Sourced from low-risk fishery with monitored improvement plan in place. **Aligned with LC and SC.**
MEMBER G: Cod fish fingers – frozen	No catch area (*from inquiry: FAO 27, Barents Sea; Norwegian Sea, Spitzbergen, Bear Island).* MCS rating – 2 (low).	Claim: Responsibly sourced. Own-brand RS claim and logo.	CUSTOMER INQUIRY Email inquiry to re sub-area. High risk of bycatch for redfish but an improvement plan is now in place, with annual progress checks by MSC.
	No method listed. *(From inquiry: trawl). RASS – high risk of redfish bycatch.*	Customer info: address, website, freephone, social media.	Responsibility claim. Sourced from low-risk fishery with monitored improvement plan in place. **Aligned with LC and SC.**
MEMBER H: Mixed species cod cakes - chilled *(Gadhus morhua)*	No catch area *(From Member: NE/ NW Atlantic; Russian, Barents & North Sea).* MCS rating 2 – low.	Claim: Our cod is responsibly caught in the NE or NW Atlantic.	MEMBER INQUIRY re subarea. High risk of bycatch for redfish but an improvement plan is now in place, with annual progress checks by MSC.
	No method listed *(From Member: Trawls and line caught)*	Customer info: address, website.	Responsibility claim. Sourced from low risk fishery with monitored improvement plan in place. **Aligned with LC and SC.**
MEMBER J: Cod fish fingers - frozen	No catch area – link to find using website (*from website: NE Arctic & Norwegian Sea)* MCS rating – 2 (low).	Claim: Own-brand RS logo. MSC claim and logo (MSC-C-50470).	WEBSITE VERIFICATION *(From Member website: Catch area/ method found on website using provenance code).* High risk of redfish bycatch. From MSC certified fishery – verified on MSC site.
	No method listed *(From website: Trawls, seines, lines and hooks, gill nets and similar nets*). High risk of redfish bycatch.	Customer info: phone, website, address.	Responsibility claim. Sourced from low risk, third-party certified fishery. A monitored improvement plan is in place to rebuild redfish. **Aligned with LC and SC.**
MEMBER K: Cod goujons - frozen	No catch area listed *(From traceback: subarea I and II).* MCS rating – 2.	Claim: We source all sorts of sustainable seafood from the best locations around the world.	TRACEBACK REQUEST *(From traceback - cod is sourced from low risk, certified fishery).* Potential high risk of bycatch but a monitored plan is in place to rebuild redfish stocks.
	No method listed. *RASS – Possible high risk of bycatch redfish*	Customer: address, website, email and phone.	Sustainability claim. Source from low risk fishery, third-party certified fishery with an

			improvement plan in place for bycatch. **Not aligned with LC (see section 5.13.1). Aligned with SC.**
NON-MEMBER 1: Cod fillets - chilled *(Gadus morhua)*	NE Atlantic – Norwegian / Barents Sea (I & IIa), or Iceland Grounds (Va). MCS rating – 2.	Claim: own brand sustainably sourced (logo).	Sourced from low risk fishery. *From ODP, all Atlantic cod is from certified fisheries. From MSC certified fishery – verified on MSC product finder – but business does not have MSC Chain of custody.*
	Hooks and lines. RASS rating – low risk.	Customer info: address, website – sustainability pg., phone.	Sustainability claim. Sourced from low risk, third-party certified fishery without chain of custody. **Not aligned with LC (see section 5.7.1). Aligned with SC.**
NON-MEMBER 5: Prepared cod fillets - frozen *(Gadus Morhua)*	NE Atlantic - Icelandic waters. MCS rating – 2 (low).	Claim: Responsibly sourced.	Responsibility claim. (*From MSC certified fishery – verified on MSC website).*
	Trawls.	Customer info: address.	Responsibility claim. Sourced from low risk, third party certified fishery. **Aligned with LC and SC.**

Table 3: Product information & claims for wild-caught flatfish: plaice (*Pleuronectes platessa*) and sole (*Limanda aspera* and *Microstomos kitt*)

Brand & Product *(Scientific name)*	Catch Area & Catch Method	Claims & Logos (plus customer information)	Risk Assessment Considerations & Alignment with SSC Codes
MEMBER A: Prepared lemon sole fillets – chilled *(Microstomus kitt)*	North Sea, English Channel, West of Scotland and Iceland. *(From traceback: North Sea).* MCS rating – 3.	Claim: Fish caught from well managed and responsible fisheries.	TRACEBACK Fishery stock is data limited; higher risk to habitat if trawls are used outside core fishing areas. Now in a FIP under Project UK. Engagement/ support of FIP verified.
	Seine and trawl caught. RASS rating – med/high habitat risk for trawling.	Customer info: address and website.	Responsibility claim. Sourced from a medium risk fishery that is in a formal FIP. **Aligned with LC and SC.**
MEMBER B: Plaice fillets - chilled	NE Atlantic – North Sea (IV). *(From traceback, Northern North Sea IVa).* RASS rating –low risk (stock status).[61]	No claims.	TRACEBACK Average RASS rating is low with high risk of bycatch for seines. Now in a FIP under Project UK. Engagement/ support of FIP verified.

[61] MCS rating not available for North Sea plaice with catch method - seines.

	Seines. RASS – high risk of bycatch.	Customer info: address.	No claims. Sourced from a low risk fishery in a formal FIP. **Aligned with SC.**
MEMBER C: Prepared plaice fillets - chilled	Atlantic FAO27 *(From traceback: North Sea).* MCS rating – 3.	No claims.	TRACEBACK High risk of bycatch and habitat impact from trawls. Now in a FIP under Project UK. Engagement/ support of FIP verified.
	Trawl. RASS rating is high for bycatch and habitat.	Customer info: address, phone.	No claims. Sourced from a medium risk fishery that is now in a FIP. **Aligned with SC.**
MEMBER D: Prepared plaice fillets – frozen	NE Atlantic (*from Member: ICES Va Iceland EEZ).* RASS rating – 3**.**	Claim: Our responsibly sourced plaice fillet…	High risk of habitat impact if fishing outside of core areas and moderate bycatch risk with trawls. Mitigation efforts in place to reduce risks. Biomass has increased for over a decade.
	No method listed. *(From Member: Danish seine, trawls)* RASS – high habitat and med bycatch risk - trawls.	Customer info: address and website.	Responsibility claim. Sourced from medium risk fishery with mitigation efforts in place to reduce bycatch and habitat impact. **Aligned with LC and SC.**
MEMBER E: Plaice fillets – chilled *(Pleuronectes platessa)*	Multiple catch areas listed. *(From traceback: North Sea IV).* MCS rating – 3.	No claims.	TRACEBACK Fishery is in a Project UK FIP. Engagement/support of FIP verified.
	Trawls or seines. RASS – high risk of bycatch/habitat for trawls; high bycatch for seines.	Customer info: address, website and careline.	No claims. Sourced from a medium risk fishery that is in a formal FIP. **Aligned with SC.**
MEMBER F: Prepared yellowfin sole – chilled *(Limanda aspera)*	Pacific Ocean FAO67 *(From MSC website: Alaska - Bering Sea and Aleutian Islands fishery - BSAI).*	Claim: Responsibly sourced fish; standard RS statement. MSC claim with logo (C-0503).	WEBSITE VERIFICATION From BSAI trawl certified fishery – verified on MSC website. Risk associated with bycatch of prohibited species (crab) and Pacific halibut.
	No method listed. *(Demersal otter trawl).* MCS rating – 3.	Customer info: address, website,	Responsibility claim. Sourced from a third party certified fishery. **Aligned with LC and SC.**
MEMBER G: Prepared plaice fillets - frozen	No catch area (F*rom traceback: North Sea IV).* MCS rating – 3.	Claim: Own-brand RS claim and logo.	TRACEBACK Medium risk fishery due to high risk of bycatch/habitat impact. Engagement/support of FIP verified.
	No method listed. (F*rom member: trawls).* RASS rating is high risk for	Customer info: address, website, social media links.	Responsibility claim. Sourced from a medium risk fishery in a formal FIP.

	bycatch and habitat.		**Aligned with LC and SC.**

Table 4: Product information & claims for wild-caught, cold-water prawns (*Pandalus borealis* and *Pandalus jordani*)

Brand & Product *(Scientific name)*	**Catch Area & Catch Method**	**Claims & Logos (plus customer information)**	**Risk Assessment Considerations & Alignment with SSC Codes**
MEMBER A: Prawn cocktail – ready to eat *(Pandalus borealis)*	NW and NE Atlantic *(From MSC: SFA 1-7, 8 13-16).* MCS rating – 1 & 2.	MSC claim and logo (MSC-C-50571).	WEBSITE VERIFICATION. From MSC certified fishery – verified on MSC product finder website. Sourced from low risk fishery – MCS 1 and 2.
	No method listed. *(From Member – trawl).*	Customer info: address and website.	No claim. Sourced from low risk, third -party certified fisheries. **Aligned with SC.**
MEMBER B: Prawns – ready to eat *(Pandalus jordani)*	Pacific Ocean (US EEZ) RASS rating – low/moderate.	Claim: Responsibly sourced (logo).	Data limited species. Mitigation measures are in place to reduce risk of habitat impact and bycatch to lower risk.
	No method listed. (Demersal otter trawl). RASS rating – moderate.	Contact info: address.	Responsibility claim. Sourced from low risk fishery. **Aligned with LC and SC.**
MEMBER C: Prawn cocktail - ready to eat *(P. borealis)*	North Atlantic prawns *(From traceback: W. Greenland, NAFO 1).* MCS low risk	No claims.	TRACEBACK risk linked to bycatch being targeted (without stock assessment). Fishery is MSC certified with measures in place to reduce bycatch, increase selectivity and reduce impact of fishing gear on seabed.
	No method listed. *(From traceback: Otter Trawl).*	Customer info: address and phone.	No claim. Sourced from low risk fishery. **Aligned with SC.**
MEMBER D: Prawns – ready to eat	NE or NW Atlantic *(From traceback: FAO 27, Iceland Va).* RASS – high risk.	No claims.	TRACEBACK Data deficient stock, high risk rating is precautionary. Mitigation measures in place to reduce bycatch i.e. sorting grid and discard ban. Fishery is in a FIP.
	No method listed. (*From Member: otter trawl).* RASS - High risk habitat impact; moderate bycatch.	Customer info: address and website.	No claim. Sourced from medium-high risk fishery with mitigation measures in place to reduce risk. **Aligned with SC.**
MEMBER E: Prawn	NW Atlantic Ocean, landed in Canada. (From	MSC claim and logo (MSC-C-50571).	WEBSITE VERIFICATION From MSC certified fishery – verified on MSC

cocktail - ready to eat *(P. borealis)*	MSC website - SFA 2-4, 8-10, 12-16; NAFO 0 & 1). RASS – low & moderate risk.		product finder website. Mitigation measures in place to reduce risk of bycatch and impact on habitat.
	Trawls. RASS – moderate bycatch and habitat risk.	Customer info: address, website and careline.	No claim (third party logo used). Sourced from a third party certified fishery. **Aligned with SC.**
MEMBER F: Prawn Cocktail - ready to eat *(P. borealis)*	NW Atlantic (FAO21) *(From MSC: SFA 1-7, 8, 13-16).* RASS – moderate risk.	Claim: Responsibly sourced prawns. MSC claim and logo (MSC-C-50571).	WEBSITE VERIFICATION From MSC certified fishery – verified on MSC website. Mitigation measures in place to reduce risk of bycatch and habitat impact.
	Trawls. RASS – moderate bycatch & habitat risk.	Customer info: address, careline, email, website.	Responsibility claim. Sourced from fisheries that are third party certified. **Aligned with LC and SC.**
MEMBER I: Prawns – ready to eat *(P. borealis)*	Barents Sea, Spitzbergen and Bear Island or NW Atlantic Ocean. (*From traceback: Ia & b, IIb).* RASS - low risk.	MSC claim and logo (MSC-C-50571).	TRACEBACK Sourced from Barents Sea (I & IIb). Mitigation efforts in place to reduce habitat impact, including regulatory measures and spatial management (protection zones).
	Trawls. RASS- High risk habitat impact.	Customer info: address, careline, website.	No claim – third party claim & logo. Sourced from a third party certified fishery. **Aligned with SC.**
NON MEMBER 2: Mixed product prawn fishcakes - chilled *(P. jordani)*	NE Pacific. (For US EEZ (excl. Alaska) – risk is low and for Canadian EEZ – moderate).	No claims.	Sourced from low and moderate risk fisheries; Risk mitigation through bycatch reduction measures and habitat protection have reduced risk.
	Trawls. RASS – moderate risk for bycatch and habitat.	Customer info: address, website.	No claim. Sourced from low to moderate risk fisheries with risk reduction actions in place. **Aligned with SC.**

Table 5: Product information & claims for wild-caught scampi (*Nephrops norvegicus*)

Brand & Product *(Scientific name)*	Catch Area & Catch Method (or production area & method)	Claims & Logos (plus customer information)	Risk Assessment Considerations & Alignment with SSC Codes
MEMBER A: Breaded scampi – frozen	NE Atlantic-area 27. *(From Member: Scottish ground in North Sea IVa and West Coast of Scotland-VI).* MCS rating (IVa) – 2 low risk in G-FU7; 3 med in F-FU9; and 4 in FU32 and F-	Claim: Responsibly sourced.	MEMBER INQUIRY re sub area. *(From Member: Sourced from low risk fisheries with specification for lower risk methods i.e. creel pots).*

	FU10.		
	No method listed. *(From Member: trawled in nets; West Scotland - creel pots).*	Customer info: address.	Responsibility claim. **Aligned with LC and SC.**
MEMBER B: Breaded scampi *(Nephrops Norvegicus)*	NE Atlantic – North Sea, West of Scotland, Irish Sea and Celtic sea. *(From traceback: FAO27-VIa and VIIa)* MCS rating –2 to 5.	No claims.	TRACEBACK *(From Member - actively involved in discussions to set up a FIP).*
	No method listed. *(From traceback: demersal trawls).*	Customer info: address.	No claim. **Aligned with SC.**
MEMBER C: Breaded scampi – chilled (No scientific name)	No catch method. *(From Member: North Sea).* MCS rating (ICES IV) – 2 to 5.	No claims.	MEMBER INQUIRY re catch area. *(From Member - actively involved in discussions to set up a FIP).*
	No method listed. (*From Member: seine or trawled).*	Customer info: address, phone.	No claim. **Aligned with LC and SC.**
MEMBER D: Breaded scampi (from Scottish langoustine)	Scottish NE Atlantic (*From Member: ICES VI).* MCS rating – 3	No claims.	*(From Member: Improvement Required; Actively involved in discussions to set up a FIP)*
	No method listed. *(From Member-otter trawl).*		No claim. **Aligned with SC.**
MEMBER E: Breaded scampi - frozen *(Nephrops Norvegicus)*	NE Atlantic. *(From Member: ICES VIa and VIIa).* MCS rating – 2 to 4 for ICES VIa; 2 or 3 for ICES VIIa.	No claims.	*(From Member - actively involved in discussions to set up a FIP).*
	Trawl.	Customer info: address, website, and careline.	No claim. **Aligned with SC.**
MEMBER G: Breaded scampi - frozen *(No scientific name)*	Caught off coast of British Isles (*From traceback: Area Irish Sea ICES VIIa and Celtic Sea North VIIg).* MCS rating – 3 for VIIa and VIIg in FU16,17,19; 2 low risk for VIIg in J-FU 14.	Claim: Own-brand RS claim and logo.	TRACEBACK REQUEST. *(From Member: actively involved in discussions to set up a FIP. Mitigation: method – nets using separator grids and large mesh size to increase selectivity and minimize bycatch).*
	No method listed. *(From Member:*	Customer info: address, careline, and	Responsibility claim. **Aligned with LC and SC.**

	Trawled).	social media.	
MEMBER K Breaded scampi - frozen (formed from langoustine; no scientific name)	No catch area info on pack. *(From traceback: ICES IVb, VIa, VIIa).* MCS – 2 or 3 for ICES VIIa.	Claim: We source all sorts of sustainable seafood…	TRACEBACK (*From Member: actively involved in discussions to set up a FIP).*
	No method listed. *(From Member: trawls).*	Customer info: phone, email, mailing address.	Sustainability claim. **Not aligned with LC (see section 5.13.1). Aligned with SC.**
NON MEMBER 2: Mixed fishcakes – chilled *(Nephrops Norvegicus)*	NE Atlantic – North Sea (IV), NW Coast of Scotland and North Ireland (ICES VIa). MCS rating – 2 to 4.	No claims.	Sourced from low to high risk fisheries. Unable to verify source or engagement/support of discussions to set up a FIP.
	Trawls.	Customer info: address and website.	No claim. Unable to verify risk and/or improvement actions in place. **Not aligned with SC (see section 5.8.2).**

Table 6: Product information & claims for farmed warm-water King prawns (*Penaeus vannamei*)

Brand & Product *(Scientific name)*	**Catch Area & Catch Method**	**Claims & Logos (plus customer contact information)**	**Risk Assessment Considerations & Alignment with SSC Codes**
MEMBER A: Raw peeled prawns – chilled *(Penaeus vannamei)*	Farmed in Honduras. MCS rating - 5	No claims.	*(From Member: prawns are from ASC and GAA-BAP certified).* Reduced sourcing risk, including feed traceability. Revised MCS rating – 3.
	Method not listed. *Pond system – intensive.*	Customer info: address and website.	No claim. Sourced from third-party certified systems, reducing risk across the supply chain. **Aligned with SC.**
MEMBER B: Cooked & peeled prawns	Vietnam. MCS rating - 5.	Responsibly sourced (logo).	*(From Member: prawns are ASC certified and GAA-BAP certified).* Reduced sourcing risk, including feed.
	No method listed. *Pond system - intensive*	Customer info: address, website.	Responsibility claim. Sourced from third-party certified farm systems, reducing risk across supply chain. **Aligned with LC and SC.**
MEMBER C:	Farmed in Vietnam. MCS rating – 5.	Responsibly farmed (logo).	*(From Member: prawns are from GlobalGAP and GAA-BAP certified*

Prepared prawns – ready to eat *(Penaeus vannamei)*			*(3*) systems).* Revised MCS rating – 2 or 3.
	Method not listed. *Pond system – intensive.*	Customer info: address, phone.	Responsibility claim. Sourced from third-party certified farm systems, reducing risk across supply chain. **Aligned with LC and SC.**
MEMBER D: Prepared prawns	Farmed in Honduras. MCS rating - 5.	Claim: Own brand farm assurance std (RS claim).	*(From Member: Sourced independently verified own brand farm assurance standard and ASC certified farm systems)*
	Method not listed. *Pond system – intensive.*	Customer info: address and website.	Responsibility claim. Sourced from third-party certified standards to reduce risk across supply. **Aligned with LC and SC.**
MEMBER E: Cooked and peeled prawns *(Penaeus vannamei)*	Honduras. MCS rating - 5.	Claim: Responsibly sourced.	*(From Member: sourced from ASC and GAA-BAP certified systems).* Sourced from third-party certified farms, including feed source.
	Method not listed. *Pond system – intensive.*	Customer info: address, website, and careline number.	Responsibility claim. Sourced from third party certified farm systems, reducing risk across supply chain. **Aligned with LC and SC.**
MEMBER F: Cooked and peeled prawns *(Penaeus vannamei)*	Farmed in Indonesia. MCS rating - 5.	Claim: Responsibly sourced. General RS claim about farmed fish.	TRACEBACK Sourced from ASC certified farm system with chain of custody and GAA-BAP certified hatchery and nursery.
	Method not listed. *Pond system – intensive.*	Customer info: website.	Responsibility claim. Sourced from third-party certified farm systems, reducing risk across supply chain. **Aligned with LC and SC.**
MEMBER G: Cooked & peeled prawns – frozen	Farmed in Indonesia. MCS rating - 5.	Own brand RS claim and logo.	Sourced from ASC and GAA-BAP certified farm systems, with feed included.
	Method not listed. *Pond system – intensive.*	Customer info: Address, website, Facebook, Twitter.	Responsibility claim. Sourced from third-party certified farm systems, reducing risk across supply chain. **Aligned with LC and SC.**
MEMBER H: Mixed product with King prawns	Prawns Farmed in Thailand, Vietnam & India. MCS rating - 5 (for SE Asia).	Our prawns are responsibly farmed in Thailand, Vietnam and India.	Sourced from GAA-BAP certified farm systems, with feed included.
	No method listed. *Pond system – intensive.*	Customer info: address.	Responsibility claim. Sourced from third-party certified farm systems, reducing risk across supply chain. **Aligned with LC and SC**.
MEMBER I: Mixed	No area listed. *(From traceback: Thailand).*	No claims.	TRACEBACK *(From traceback: farm, hatchery and feed is GAA-BAP*

species product with prawns – frozen *(Penaeus vannamei)*	MCS rating - 5		*certified).* Reduced sourcing risk.
	No method listed. *Pond system – intensive.*	Customer info: address, website	No claim. Sourced from third-party certified farm systems, reducing risk across supply chain. **Aligned with SC.**
MEMBER J: Prepared raw King prawns – frozen	No area listed. *(From inquiry: Vietnam, China, Thailand.)* MCS rating - 5.	Own brand standard (logo). General RS statement.	CUSTOMER INQUIRY re production area and. Unable to confirm/verify if farm is third-party certified, to what standard and if feed is included in certification.
	Method not listed. *Pond system – intensive.*	Customer info: address, website.	Responsibility claim. Insufficient evidence to demonstrate reduced risk rating. **Not aligned with SSC Codes (see section 15.12).**
MEMBER K: Prepared King prawns – frozen	Farmed in SE Asia. *(From customer inquiry: Vietnam).* MCS rating - 5.	No claims.	CUSTOMER INQUIRY made about specific production area and certification. *(From inquiry: farms are GAA-BAP certified 2*).* Reduced sourcing risk but not feed.
	Method not listed. *(Pond system – intensive).*	Customer info: address, website, email, careline.	No claims. Sourced from third-party certified farms to reduce risk, but unable to verify if feed is included in certification. **Not aligned with SC.**
NON-MEMBER 1: King prawns – ready to eat *(Penaeus vannamei)*	Farmed in Vietnam. MCS rating - 5.	Responsibly farmed (logo).	*(From corporate website –warm water prawns are from BAP certified farms – 2*, supports FIPs for SE Asian feed.* Unable to verify if marine feed FIP is part of supply chain.
	Method not listed. *Pond system – intensive.*	Customer info: address, website for sustainability credentials and claims.	Responsibility claim. Insufficient evidence to show appropriate risk mitigation actions are in place to reduce risk ratings. **Not aligned with SSC Codes (see section 5.7).**
NON MEMBER 5: Mixed species product with King prawns - frozen	Farmed in Vietnam. MCS rating - 5.	Responsibly farmed. All (our) products are responsibly sourced protecting the surrounding marine ecosystem.	CUSTOMER INQUIRY by email. (From inquiry: Prawns are sourced from GAA-BAP certified farm system (2*). Reduced sourcing risk but not feed.
	Method not listed. *Pond system – intensive.*	Customer info: address and website	Responsibility claim. **Terminology is not in line with LC.** Sourced from

(Penaeus vannamei)			third-party certified farm to reduce risk, but unable to verify if feed is included in certification. **Not aligned with SC (see section 5.17).**

Table 7: Product information & claims for farmed sea bass (*Dicentrarchus labrax*) and sea bream (*Sparus aurata*)

Brand & Product *(Scientific name)*	**Catch Area & Catch Method**	**Claims & Logos (plus customer information)**	**Risk Assessment Considerations & Alignment with SSC Codes**
MEMBER A: Prepared sea bass fillets – chilled *(Dicentrarchus labrax)*	Farmed in Greece and Turkey. *(From traceback: Turkey).* MCS rating - 3.	No claims made.	TRACEBACK *(From traceback: sourced from GlobalGAP and FOS Certified farms).* Sourced from third-party certified systems to reduce risk and continue sourcing.
	Open net.	Customer info: address and website.	No claims. Sourced from third-party certified sources. **Aligned with SC.**
MEMBER B: Sea bass fillets	Farmed in Turkey. MCS rating - 3.	Responsibly farmed.	*(From Member: GlobalGAP)* Sourced from third-party certified systems to reduce risk and continue sourcing.
	Open net.	Customer info: address.	Responsibility claim. Sourced from third-party certified sources. **Aligned with LC and SC.**
MEMBER C: Prepared sea bass fillets – fresh packed	Farmed in Turkey. MCS rating - 3.	Claim: Responsibly farmed (logo).	(*From Member: sourced from GlobalGAP certified farm).* Sourced from third-party certified systems to reduce risk and continue sourcing.
	Open net.	Customer info: address.	Responsibility claim. Sourced from third party certified systems. **Aligned with LC and SC.**
MEMBER D: Prepared sea bass – chilled	Farms in Greece & Turkey *(From Member: Turkey; Aegean Sea).* MCS rating - 3.	Claim: Own brand farm assurance standard.	MEMBER INQUIRY *(From Member: farm is independently audited to own farm standard and GlobalGAP certified).* Sourced from certified systems to reduce risk and continue sourcing.
	Type of system (*From Member: open sea pens).*	Customer info: address and website.	Responsibility claim. Sourced from third party certified and own brand assurance. **Aligned with LC and SC.**
MEMBER E: Sea bass	Farmed in Greece or Turkey (*From Member: Turkey).*	Claim: Responsibly sourced.	(*From Member: Sourced from GlobalGAP certified farms).* Sourced from third-party certified

fillets – chilled *(Dicentrarchus labrax)*	MCS rating - 3.		systems to reduce risk.
	Open net.	Customer info: address, careline number, website.	Responsibility claim. Sourced from third-party certified systems. **Aligned with LC and SC.**
MEMBER F: Sea bream fillets *(Sparus aurata)*	Farmed in Turkey. MCS rating - 3.	Claim: Responsibly sourced.	MEMBER INQUIRY *(From Member: farm is* GlobalGap certified). Sourced from third-party certified systems to reduce risk and continue sourcing.
	Open net.	Customer info: address,	Responsibility claim. Sourced from third-party certified systems. **Aligned with LC and SC.**
MEMBER H: Prepared sea bass – *(Dicentrarchus labrax)*	Farmed in Greece, Spain/ Turkey. *(From traceback: Turkey).* MCS rating- 3.	Claim: Responsibly farmed.	TRACEBACK *(From traceback: Sourced from GlobalGAP certified farm).*
	Off-shore cages.	Customer info: Mailing address.	Responsibility claim. Sourced from third-party certified systems. **Aligned with LC and SC**.
NON-MEMBER 1: Prepared sea bass fillets – chilled *(Dicentrarchus labrax)*	Farmed in Turkey. MCS rating - 3.	Claim: Responsibly farmed (logo).	From corporate policy, statement that all farmed seafood only comes from certified sources. Unable to verify what certification and if it covers feed
	Open net.	Customer info: phone; website – sustainability page.	Responsibility claim. Unable to verify production or third-party certification. **Not aligned with SSC Codes.**
NON MEMBER 5: Sea bass fillets - frozen *(Dicentrarchus labrax)*	Farmed in Turkey. MCS rating - 3.	Claim: 'Responsibly farmed'. 'Sea Bass fillets are farmed in the pristine clear waters of the [location given]. All products are responsibly sourced protecting the surrounding marine ecosystem.'	Unable to verify if product is from a certified farm (and if so, what certification) or whether feed was included.
	Open net.	Customer info: address.	Responsibility claim. **Terminology and language is not in line with LC (see section 5.17).** Unable to verify production or third-party certification. **Not aligned with SC.**

Table 8: Product information & claims for farmed salmon (*Salmo salar*) & wild-caught salmon (*Oncorhynchus keta, Oncorhynchus gorbuscha*)

Brand & Product *(Scientific name)*	**Catch Area & Catch Method**	**Claims & Logos (plus customer information)**	**Risk Assessment Considerations & Alignment with SSC Codes**
MEMBER A: Fishcakes with wild Alaskan salmon - frozen *(From website: Oncorhynchus gorbuscha)*	Pacific Ocean (Alaska). MCS rating – 1 (low risk).	Claim: …our frozen fish is the same as our fresh fish, always responsibly sourced.	WEBSITE VERIFICATION From MSC certified Alaskan salmon fishery - verified on MSC product finder site.
	No catch method.	Customer info: address.	Responsibility claim. Sourced from low risk, third party certified fishery. **Aligned with LC and SC.**
MEMBER B: Fishcakes with wild-caught salmon *(O. gorbuscha)*	Pacific Ocean. *(From Member: Alaskan fishery, NE Pacific)* MCS rating – 1.	Claim: Responsibly sourced (logo).	MEMBER INQUIRY re catch area. Product sourced from low risk fishery.
	No catch method.	Customer info: address.	Responsibility claim. Sourced from low risk fishery. **Aligned with LC and SC.**
MEMBER C: Prepared salmon – ready to eat *(Salmo salar)*	Farmed in Norway.	Claim: Responsibly farmed (logo).	*(From Member: Sourced from GlobalGAP certified farm).*
	Open net system. MCS rating – 3.	Customer info: address and phone number.	Responsibility claim. Sourced from low risk, third party certified farm. **Aligned with LC and SC.**
MEMBER D: Fishcakes with farmed salmon	Farmed in Scotland – Lochmuir. MCS rating – 3.	Claim: Made with (own brand) assured salmon from farms in Scotland. Own brand farm standard.	MEMBER INQUIRY re assurance system. Standard is independently audited.
	Open sea/loch pens.	Customer info: address and website.	Responsibility claim. Sourced from independently assured farm systems **Aligned with LC and SC.**
MEMBER E: Salmon fillets - chilled *(Salmo salar)*	Farmed in Scotland. MCS rating – 3.	Claim: Responsibly sourced farmed salmon. RSPCA claim and logo.	Sourced from RSPCA and Global GAP certified farm system.
	Open net pen.	Customer info: address, website, and careline.	Responsibility claim. Sourced from third-party certified systems. **Aligned with LC and SC.**

MEMBER F: Smoked salmon fillets - chilled ***(****Salmo salar)*	Farmed in Argyll. MCS rating – 3.	Claim: General RS statement. RSPCA claim and logo.	Sourced from RSPCA and GlobalGAP certified system.
	Open net pens.	Customer info: address, careline, website.	Responsibility claim. Sourced from third party certified farm systems. **Aligned with LC and SC**
MEMBER G: Pacific pink salmon fillets - frozen ***(****O. gorbuscha)*	NE/NW Pacific Ocean. MCS rating 1 & 2.	Claim: Own brand RS claim and logo.	Moderate risk of bycatch is for other salmon species – all managed stocks. Overall risk remains low.
	Purse seine and gill net. RASS - medium-risk bycatch	Customer info: Address, Facebook, Twitter.	Responsibility claim. Sourced from low risk fisheries. **Aligned with LC and SC.**
MEMBER H: Prepared salmon – chilled (*Salmo salar)*	Norway or Scotland. *(From traceback: Norway).* MCS rating - 3.	Claim: Our salmon is responsibly farmed in Norway or Scotland.	TRACEBACK Sourced from farm with GlobalGAP certification.
	No production method.	Customer info: address	Responsibility claim. Sourced from a medium risk, third-party certified farm system. **Aligned with LC and SC.**
MEMBER J: Prepared wild pink salmon fillets – frozen	NE Pacific. *(From website Alaska).* MCS rating – 1.	Claim: Own brand RS standard (logo).	WEBSITE INQUIRY. Sourced from low risk fishery, which is MSC certified.
	(*From website: Gill nets/ similar nets, lines & hooks, pots & traps).*	Customer info: phone, website, address.	Responsibility claim. Sourced from low risk fishery. **Aligned with LC and SC.**
MEMBER L: Sockeye Salmon *(Oncorhynchus nerka)*	NE Pacific Ocean. (From traceback – Alaska 4e) MCS rating – 2.	No claims.	TRACEBACK Bycatch is mainly other managed salmon species. Fishery is RFM certified FAO-Based Responsible Fisheries Management
	Gillnets and similar nets. RASS – moderate bycatch risk.	Customer info: address, email, and phone.	No claims. Sourced from low risk, third-party certified fishery. **Aligned with SC.**
NON MEMBER 2: Salmon fillets – chilled *(Salmo salar)*	Farmed in Norway and Scotland. MCS rating - 3.	No claims.	WEBSITE INQUIRY re production and certification. Unable to verify third party certifications, if any.
	No production method.	Customer info: address.	No claims. **Not aligned with SC (see section 5.8.2).**
NON MEMBER	Farmed in Iceland. MCS rating – 3	Claim: Ecologically farmed in the pristine	WEBSITE INQUIRY re certification. Sourced from GAA-BAP certified

5: Salmon fillets - frozen		waters of Iceland; Responsibly Sourced.	farms and ASC certified feed.
	Open pens.	Customer info: address and website.	Responsibility claim. Sourced from third-party certified farm/feed systems**. Not aligned with LC (see section 5.17.1). Aligned with SC.**

Table 9: Squid

Brand & Product *(Scientific name)*	**Catch Area & Catch Method**	**Claims & Logos (plus customer information)**	**Risk Assessment Considerations & Alignment with SSC Codes**
MEMBER I: Cooked squid rings - chilled *(Loligo formasana)*	No catch area listed. *(From Traceback: Gulf of Thailand).*	No claims.	TRACEBACK REQUEST. No RASS /MCS rating. *(From Member: source assessed as high-risk, with decision to stop sourcing – to be replaced with stock from a new location in FIP.)*
	No catch method listed. *(From traceback: jigging and pair trawling).*	Customer info: address, phone, website	No claims. Decision to stop sourcing from high risk fishery where engagement is not proving to be effective or reducing risk. **Aligned with SC.**
MEMBER H: Mixed species product with squid *(From member – species is Japanese flying squid).*	No catch area (*From Member: Yellow Sea – north).*	No claims.	No RASS or MCS rating. Stock is data deficient. Fishsource score of 6 for all management indicators and stock health; score of 8 for future stock health. Average score = 6.4. Improvements required.
	(From Member: Mid-water trawl).	Customer info: address.	No claims. **Aligned with SC.**

ANNEX F—SUMMARY OF LABELLING ASSESSMENT

	All products		**Farmed fish**		**Wild-caught fish**	
	Total	Claims (#)	All farmed	Claims (#)	All wild-caught	Claims (#)
ALL BUSINESSES	**80**	**52**	**29**	**25**	**51**	**27**
Non-SSC Members	13	7	6	5	7	2
SSC retail members	47	32	16	15	31	17

SSC brand members	20	13	7	5	13	8

SPECIES (TOTAL PRODUCTS)	No. of enviro Claims/ No-claims	Claims and products not aligned with SSC		Reason for non-conformance
		Not aligned - LC	**Not aligned - SC**	
TUNA (9)	4 – 1 SS & 3 RS	0	0	N/A
	5 - No claims		1 - NM	Insufficient/ unverified information
COD (12)	11 – 2 SS & 9 RS	2 – SSC-M & NM	0	Misuse of terminology in SS/RS claims
	1- No claims		0	N/A
PLAICE/ SOLE (7)	4 - RS	0	0	N/A
	3 – no claims		0	N/A
CW PRAWNS (8)	2 - RS	0	0	N/A
	6 – No claims		0	N/A
SCAMPI (8)	2 – 1 RS and 1 general claim	1 – SSC-M	0	Misuse of RS/SS terminology in general sustainability claim
	6 – no claims		1 - NM	Insufficient/unverified source fishery information
WW PRAWNS (13)	11 – RS claims	1 - NM 1 - SSC	1 – NM 1 - SSC-M	2 x SSC codes: Insufficient/unverified source fishery information
		1 - SSC-M	0	Misuse of RS/SS terminology
	2 – no claims		0	N/A
SEA BASS/ BREAM (9)	8 – RS	2 - NMs	2 - NMs	2 x SSC codes: Insufficient/unverified source farm information
	1 – no claim		0	N/A
SALMON - farmed (7)	6 – RS claims	1 -NM	0	Misuse of RS/SS terminology
	1 – no claims		1 - NM	Insufficient/unverified source farm information
wild (5)	4 – RS claims	0	0	N/A
	1- no claim		0	N/A
Squid	2 – no claims		0	N/A
SUMMARY	**LC**		**SC**	
52 claims	4 Non-member	3 lack of info 1 misuse	6 NMs	6 Lack of verified info
	4 Member	3 Misuses, 1 is same 2 times	1 – SSC-M	1 insufficient info