Sustainable Seafood Coalition (SSC)

Members' meeting minutes

Date: 28 June 2018

Location: ClientEarth offices, London E8 3QW

Number of attendees: 20 total (including four ClientEarth staff acting as facilitator, secretariat and minute takers and one external presenter)

Summary of agreed points

Secretariat update

Secretariat to: share updated Codes online and, on the same day, inform members that the one-year social responsibility implementation period begins; determine an appropriate fee for consultancy work, share this with members and - once agreed by all - update website to advertise this service.

Item 1: SSC expansion strategy

Secretariat to: write and circulate FAQs sheet; approach relevant NGO on government catering contracts.
Members to: share this sheet with their supply chain contacts, where appropriate.

Item 2: The Global Sustainable Seafood Initiative (GSSI)

Secretariat to: informally consult competition law experts on implications of referencing one benchmarking tool; identify members willing to help with working group to clarify specific Guidance and Code amendments; bring suggested amendments to GSSI references to the working group.

Item 3: Risk Assessment resource sharing

Members to: confirm with the secretariat if they are willing to participate in risk assessment toolkit development; share resources and existing processes to support lead-member in toolkit development.
Secretariat to: explore options to commercialise this toolkit.

Item 4: Updates to Guidance

Secretariat to: compile recommendations, including earlier discussion on GSSI; invite members to, and facilitate, a working group on language in the Codes and Guidance; prompt and host website articles on how specific members have implemented the Codes, with reference to initiatives endorsed by the members being profiled.

> Members to: provide material for website articles on their Code implementation strategy.
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> **Item 5: Code Implementation FAQs**
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> Members to: continue sharing ideas and suggestions on streamlining the code and implementation process, so that the secretariat can provide effective and sufficient support.

Purpose of the members' meeting

To seek support for the membership expansion strategy; to agree an SSC perspective on the role of the GSSI in relation to the Codes and Guidance documents; to highlight and discuss FAQs on Code implementation; to explore options for sharing resources on conducting risk assessments; and to discuss updates to the Guidance.

Secretariat update:

The secretariat updated the group on activities since the last meeting, and reported against the KPIs previously agreed by members.

Discussion and comments

- The secretariat shared the finance report. One member questioned why the salary was so low, and this was explained in two parts. Firstly, that the report was spend up to June 2018, and therefore will double. Secondly, the secretariat is currently one person at 80%FTE and that all additional staff support is currently funded externally.

- The secretariat reported that all members have now agreed to the statements on social responsibility which were proposed at the last meeting. These Code amendments are with the designer and the group discussed whether the one-year implementation period should apply from when the updated Codes are published on the website.

- The SSC has one new member and has lost one member since the last meeting. Conversations with several prospective members are ongoing. The secretariat explained that, with support from new personnel in the ClientEarth comms team, they will be working on a video to introduce and explain the SSC Codes during the summer, to share with existing and prospective member businesses.

- The secretariat reported on the SeaWeb Summit, in particular the reference to the SSC in the plenary session, which outlined ClientEarth's engagement with the Spanish seafood supply chain.

- The group discussed other collaborative market-led initiatives. In Spain, ClientEarth is working with retailers in relation to fish and seafood. The Hong Kong SSC initiative is applying the SSC Codes with some additions to make them relevant to their market. This led to discussions on where the value of direct replication is for the SSC itself, and suggestions that a business case to help with the financial sustainability of the SSC. Some suggestions included copyrighting the Codes, or introducing consultancy fees when sharing our expertise and experiences. A member countered that as UK businesses tend to have international supply chains,

there is intrinsic value in other markets adopting a version of the Codes. Another pointed out that the SSC itself could learn a lot from other markets too. Some members suggested that instead of copyrighting the Codes, the SSC could charge for time and support for other similar initiatives looking to adopt best practice, and that such projects tend to be taken more seriously when there is a financial implication.

Agreed:

- There might be financial opportunities being missed when intellectual property, and support for its implementation, is given away freely to other organisations aiming to emulate SSC model. It would be appropriate to determine a 'consultancy fee' structure for the secretariat to provide support to other markets wanting to replicate the SSC Codes.

- Once the point above is agreed, it should be clearly detailed on the SSC website. These fees will not apply to the support ClientEarth is providing to the HKSSC during 2018 as this has already been offered.

Actions:

Secretariat to: post updated Codes online and, on the same day, inform members that the one-year implementation period begins; determine an appropriate fee for consultancy work in other markets, share this with members and - once agreed by all - update website to advertise this service.

Item 1: SSC expansion strategy

Membership expansion is a primary goal of the SSC in 2018, to increase the number of businesses that align on sourcing and labelling commitments. Two approaches have been employed; the first is a 'cold-calling' approach and the other builds on existing member relationships within their supply chains.

Discussion and comments

- The secretariat described how developing relationships from scratch with prospective new members can take several months, and that such conversations are currently ongoing with several businesses. Where connections are made by existing members, a level of trust and understanding develops much more quickly.

- One member explained how they have engaged their National Account Managers to liaise directly with their customers on SSC membership. They will be using letters of invitation from the secretariat to encourage their customers to become members. This activity can show their added value as a supplier.

- Some members discussed other avenues for expansion. Government foodservice contracts were discussed, and it was pointed out that many contracts now require sustainable seafood. One member highlighted the work done in this area by a particular NGO, which the secretariat could approach.

- Some members stated that they would find an FAQs sheet useful to share with contacts in their supply chain who might consider SSC membership for their own businesses.

Agreed:

- Businesses would find it easier to engage their supply chains with easily accessible resources outlining the form and function of the SSC.

Actions:

Secretariat to: write and circulate FAQs sheet; approach relevant NGO on government catering contracts.

Members to: share this sheet with their supply chain contacts, where appropriate.

Item 2: The Global Sustainable Seafood Initiative

The Global Sustainable Seafood Initiative (GSSI) developed a global benchmarking tool to provide transparency between labelling and seafood certification programmes. The GSSI is currently cited in the SSC Guidance document as a useful tool for identifying credible third-party certification schemes, but this reference was written before a meaningful number of schemes had been through the benchmarking process. The GSSI now recognises five standards, so its place within the Guidance or Codes needs reviewing.

Discussion and comments

- Herman Wisse (Managing Director of the GSSI) joined the meeting over Skype, before a Q&A with members. He opened with a presentation which covered the development of the Benchmarking Tool, the schemes that have been recognised or are publicly committed to assessment, and the partners with whom they collaborate. The presentation also covered their move into social compliance certification schemes and their close collaboration with the Food and Agriculture Organisation (FAO).

- One member asked about criticisms raised by industry and media of some certification schemes, and whether these issues were covered in the scope of the tool. Herman explained that the schemes are benchmarked against the FAO Code of Conduct for Responsible Fisheries, which does not clearly define the principles against which these criticisms were directed. He stated that there would be a revision process of the benchmark tool next year, and that after a certification scheme has been recognised by the benchmarking tool, it would need to be reviewed every 3-4 years. The criticisms would be addressed if the FAO CoC is amended to address the contested principles.

- Another member raised a question about supplementary components and their recognition within the tool. The response was that the GSSI is not set up to make value judgements about supplementary components which go beyond FAO guidelines, as these components could have trade-offs such as increased cost of certification, or an unhelpful focus on schemes meeting as many components as possible, which are not necessarily equal in impact or importance. Herman

confirmed that the GSSI was transparent in detailing which schemes had conformed to such additional components.

- After the call, the members discussed how and where to acknowledge the GSSI. Some felt strongly that using this tool would simplify sourcing (and potentially labelling) decisions, because rather than assessing a third-party certification scheme against the criteria listed in the Guidance, they could refer to the outcomes of the GSSI. These members pointed out the value of helping smaller businesses to simplify their sourcing decisions. However, other members expressed great concern about supporting any specific tool and noted that when developing the codes the group was extremely careful not to highlight any particular project that would steer such a huge proportion of the UK seafood supply chain towards it, as this could have implications under competition law. In relation to 'endorsement' implications, one member cited the strength of the business names within the SSC, and how this appeals to other organisations, as another reason not to name any particular initiative.

Agreed:

- A working group should discuss the exact phrasing to be used, but any GSSI mention should be a suggestion and not a requirement. E.g. "certification schemes such as those recognised by the GSSI Benchmarking Tool". The group is not willing to give the impression that the SSC specifically endorses one particular tool.

Actions:

Secretariat to: informally consult competition law experts on implications of referencing one benchmarking tool; identify members willing to form working group to clarify specific Guidance and Code amendments; bring suggested amendments to GSSI references to the working group.

Item 3: Risk assessment resource sharing

Some members brought a joint proposal on the management of risk assessment processes and the development of a shared resource. This was with a specific objective of ensuring efficiency and reducing the burden of repetition through their supply chains. The proposal was presented in three parts:

- 1. To have an external review of how members handle the risk assessment process as a 'gap analysis' to identify the questions being asked of suppliers and metrics being used. Any members interested in participating would need to provide a financial contribution if an external consultant was required.

- 2. In relation to the first suggestion, a specific risk assessment resource could show direct value of the SSC to potential new members, helping with membership expansion.

- 3. In the longer term, the SSC could consider how ethical information is currently stored, requested and shared through SEDEX, and whether a similar 'portal' model for environmental risk assessments could improve efficiency within all businesses' supply chains.

Discussion and comments

- Some members pointed out that the SSC Guidance is a tool to help businesses to structure their risk assessment processes. An option to update or further develop this document was suggested.

- The group saw the value in agreement on risk assessment requirements, and some suggested that this should be led by the retailers. Many recognised the benefit of identifying gaps in their own processes, and expressed a willingness to share metrics and questions, with the possibility of sharing some generic data such as country-level risk.

- Some concerns were raised. The complexity of sharing more sensitive or commercially-protected data would be a limiting factor. One member brought up GDPR data protection, in relation to who would own and who would have access to the collected data. To illustrate how such challenges can be overcome, another member pointed to a SEDEX-style information sharing platform. One pointed out that most businesses already have risk assessment processes in place, and that these are examined through the implementation report. The Food Network for Ethical Trade (FNET), the Seafish Common Language Group (CLG), the SSC Codes, The Seafood Alliance for Legality and Traceability (SALT) and many fee-based tools were also cited as resources covering this area. Some members doubted that businesses would be willing to share a process which has taken so much work to develop, and forms part of their competitive advantage.

- Some members suggested that the SSC could use the Codes, Guidance and membership base to build a toolkit for risk assessment information gathering. Not only could this benefit new and established members, but it could also be made available to all businesses to buy and use. A ballpark figure of £100 per business was suggested, though it was pointed out that this could be tiered based on turnover.

Agreed:

- One member volunteered to lead on the development of a risk assessment toolkit, based on the Codes and the Guidance, with logistical support from the secretariat.

Actions:

Members to: confirm with the secretariat if they are willing to participate in risk assessment toolkit development; share resources and existing processes to support lead-member in toolkit development.

Secretariat to: explore options to commercialise this toolkit.

Item 4: Updates to Guidance

The secretariat highlighted a selection of Guidance sections that require updating. These were discussed in turn. Due to time limitations, it was agreed that the specific wording for each update could not be agreed during the meeting.

Discussion and comments

- 1. The codes "will apply to all products containing fish within two years (by September 2017)", p.5. This phrase prompted a discussion on the challenges of cosmetics, condiments and especially pet food. For many of the larger businesses, this commitment and has not yet been fulfilled, partly because the work was more extensive than anticipated, but also due to other emerging priorities. So, although there are continuing efforts to resolve this, the date should be removed. It was suggested that expanding membership to pet food manufacturers would be a useful step in achieving this commitment.

- 2. We have added statements on social responsibility to the Codes. Due to the plethora of resources on social responsibility, it was suggested that support on implementation should form part of the risk assessment toolkit. Amendments to the Guidance could follow this work.

- 3. The Guidance references consumer facing traceability which "could be done through the use of QR or bar codes." p.9. Due to developments in the technology, this can be updated to also reference blockchain, but not a specific service provider.

- 4. Should we point towards external initiatives to support transparency (e.g. The Ocean Disclosure Project) and FIP support and credibility (e.g. FisheryProgress.org)? There was concern about signposting members towards specific initiatives, as this could be interpreted as an endorsement. The sheer number of such initiatives (both industry and NGO led) was also cited as a risk, as the SSC would need to be able to justify including some and not others. A strategy could be developed to highlight initiatives which individual members would like to support.

- 5. Phrasing on p. 34 of the Guidance that Article 35 of the CMO "is due to come into force on 14 December 2014" is out of date. Due to the ever-changing legal landscape of food labelling, it was suggested that the details of the CMO is removed and the Guidance should direct readers towards the Seafish Legislation site.

Agreed:

- A working group should take on board the following sentiments expressed for each item and clarify wording.

- 1. The Codes apply to food for human consumption. SSC Members who sell other products containing fish will collaborate to bring them in line with the Codes.

- 2. Build resources on social responsibility into the toolkit discussed in Item 4.

- 3. Consumer facing traceability "could be done through the use of for example QR, bar codes or blockchain technology."

- 4. We should not be referencing or 'endorsing' specific initiatives in the Guidance. Instead, members can write or feature in blogs about how they have implemented the Codes, highlighting initiatives or opinions where desired and relevant.

- 5. Remove details of the CMO regulation and direct readers towards http://www.seafish.org/industry-support/legislation

Action:

Secretariat to: compile recommendations, including earlier discussion on GSSI; invite members to, and facilitate, a working group on language in the Codes and Guidance; prompt and host website articles on how specific members have implemented the Codes, with reference to initiatives endorsed by the members being profiled.

Members to: indicate support for, and participate in, a drafting working group; provide material for website articles on their Code implementation strategy.

Item 5: Code Implementation FAQs

Through meetings with members and discussions on Code implementation, the secretariat has identified common themes and challenges, which have been generalised into the following FAQs to prompt discussion.

Discussion and comments

- How should the SSC logo be used? The secretariat reminded the group that the SSC logo can be used in any business communications except on product packaging, to avoid being misconstrued as an ecolabel. Where the logo is used, it should be accompanied by a link to the SSC website and ideally an invitation to find out more about any environmental claims being made.

- What constitutes "ongoing openness" and "sufficient communication"? Members discussed the value and challenges of having a full sourcing policy publicly accessible, and affirmed that this decision should be dependent on the business. Communication with the secretariat was also raised as an important commitment.

- How should we be using the words 'sustainable' and 'responsible'? The secretariat reminded members that the voluntary environmental claims made in line with the Codes should not supercede those used by third-party certification standards.

- How to ensure a "clear, consistent and meaningful approach" to environmental claims? Members discussed the value of requiring sign-off from a CSR colleague for any external messaging, to ensure that the language being used is aligned with the SSC codes. It was acknowledged that this can present a challenge for businesses with a large number of products or communications activity.

Agreed:

- Support and site visits from the secretariat can be useful when teams with limited exposure to the SSC Codes are working on their implementation, e.g. with communications and marketing.

Actions:

Members to: continue sharing ideas and suggestions on streamlining the code implementation process, so that the secretariat can provide effective and sufficient support.