

# Sustainable Seafood Coalition (SSC) Sourcing working group minutes

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Date: 10 July, 2013

Location: Food and Drink Federation (FDF), 6 Catherine Street, London WC2B 5JJ

Number of attendees: 15 total (including 5 members, 6 non member experts and 4 ClientEarth staff acting as facilitator, member and secretariat - minute takers)

## Summary of agreed points

### Item 1: Risk assessment flowchart and engagement in FIPs

- Small and medium businesses (SMEs) will be able to rely on another business' or organisation's (either within or outside the SSC membership) engagement with a fishery or farm when they cannot do so directly themselves. There is no formal definition of what constitutes an SME and this will need to be defined for the SSC. Some of the group thought there ought to be commitments in the code for the member to prove through a paper trail that another business already has a level of engagement with the fishery or farm and evidence that shows this is helping to improve it.
- Engagement conditions should apply to medium-risk as well as high-risk outcomes in the risk assessment flow chart.
- Larger businesses should engage where possible, but not in every fishery/farm that has a high/medium risk outcome, Some of the group thought that the member should be engaging in at least some fisheries/farms within their whole sourcing portfolio, but there should be an element of trusting in others in the SSC that everyone in the group is doing their part in engaging with fisheries/farms.

### Item 2: Transparency in risk assessment

- The risk assessment methodology of a member should not automatically be made publicly available, but if challenged each member should be able to prove their case. The person or body making the challenge must present a case as to why they believe the claim is not true, otherwise time could be wasted responding to needless queries.

**Item 3: Recognition of the use of the AIPCE-CEP Principles for Environmentally Responsible Fish Sourcing in the code**

- No additional sentence/phrasing is required to clarify that the code incorporates AIPCE-CEP Principles for Environmentally Responsible Fish Sourcing.

**Item 4: Base criteria for the risk assessment listed in Appendix 1**

- Marine ingredients should be traceable but the information will not be publicly available. The marine ingredients would be subject to risk assessment, but not necessarily by the member, and the traceability commitments would apply to fish feed ingredients however this would not include a commitment to make information available on request on marine ingredients of fish feed.
- The other additional base criteria that were proposed will not be included at this time. The code is dynamic and these may be addressed in a future version.

**Item 5: Sourcing of by-catch species**

- It was thought that if the best gear was in use for the target species, in combination with other measures to minimise by-catch, then the sale of the by-catch could be appropriate, but this needs to be discussed further.
- Members will need to put the by-catch fish through the same risk assessment process as they would target fish, and this should be made clear in the code.

**Purpose of the working group meeting**

The purpose of this meeting was to discussing the following issues in the sourcing code:

- Risk assessments and engaging in improvement projects;
- Sourcing of by-catch species; and
- Base criteria and Appendix 1 in the code.

Additionally, there were two external presentations. The first, by Seafish, outlined the new Risk Assessment for Sourcing Seafood (RASS) online resource; the second, by IDH (Sustainable Trade Initiative) discussed the 'Farmers in Transition' (FIT) fund and maintaining sustainable trade for development. These two presentations, which can be found on the SSC website, stimulated discussion points which are included by section in the minutes.

## Item 1: Risk assessment flowchart and engagement in improvement projects

The group discussed what level of engagement a member should have with a fishery or farm when the risk assessment outcome for the fish is either high or medium risk, before they can make a responsibility claim. The group also considered whether the risk-assessment process flow chart was clear enough or if there was a need for a clearer link between the 'medium risk' and 'engagement' boxes. The group discussed how a member's engagement in a high/medium risk fishery or farm should be defined, approached and measured. The question of whether the member's risk assessment tool (but not the outcome, which is commercially sensitive information) should be transparent was also discussed.

### Discussion and comments

- It was raised that it is unrealistic to expect very small companies (such as a fish and chip shop) to engage directly in an improvement project, and that even large businesses have a limit on resources for engagement. It was noted that there is variation in the type of 'engagement' relating to the scope of the project (e.g. whether looking at species stock status or at gear types being used by the fishers) and not all of these constitute what is formally known as 'Fisheries Improvement Projects' (FIPs). In addition, it was noted that not all engagement involves financial investment. Even for large businesses, it was felt it would be unreasonable to expect engagement in all of the supply lines used and large businesses must prioritise key lines. Rather it would be more important that businesses of that scale had engagement in some of the fisheries/farms with their whole portfolio fish.
- There was a discussion that larger members should be able to demonstrate they have attempted to engage in improvement, especially if they are communicating about this, even if they cannot carry out engagement for any reason (such as the FIP being closed to new businesses).
- The issue of 'free-riding' was discussed and a suggestion was made to look into initiatives in other commodities to see comparisons e.g. in recycling or composting.
- The importance of the due diligence of a business that is engaging with a fishery or farm was highlighted, and some of the group felt that members should demonstrate an awareness of engagement opportunities with a fishery or farm, and should commit to engaging with the fishery or farm where possible. It was suggested it could be specified that members using this risk-assessment option will conduct such checks, and be able to demonstrate their findings and awareness of existing improvement work through a paper trail if asked, and this would help avoid 'free-riders'. The ability or extent to which they can engage is an individual business' decision.
- Under the RASS framework Seafish could help businesses by determining what FIPs/AIPs exist for specific fisheries/farms. The group was reminded that there is a publicly available list of FIPs on the SFP website.

- Some of the group thought a member's engagement with a fishery or farm should be a pre-question in the flow chart or a more clearly defined part of the process. Some also thought it could be a requirement for the business to justify why they are not engaging with a fishery or farm.
- It was noted that the scale of sourcing should be factored in; the need to be involved in FIPs or similar would grow depending on whether a member sources a small or large amount of stock from the fishery or farm.
- There was discussion around identifying what a credible FIP is. This needs to be clearly understood and as some FIPs are confidential, it would be impossible to reveal detail. The Secretariat noted that a discussion on credible fisheries and aquaculture improvement projects had already taken place in the latest labelling working group meeting on [8 May](#) and that the outcomes from this could be included in the sourcing code guidance document.

#### Agreed:

- Small and medium businesses (SMEs) will be able to rely on another business' or organisation's (either within or outside the SSC membership) engagement with a fishery or farm when they cannot do so directly themselves. There is no formal definition of what constitutes an SME and this will need to be defined for the SSC. Some of the group thought there ought to be commitments in the code for the member to prove through a paper trail that another business already has a level of engagement with the fishery or farm and evidence that shows this is helping to improve it.
- Engagement conditions should apply to medium-risk as well as high-risk outcomes in the risk assessment flow chart.
- Larger businesses should engage where possible, but not in every fishery/farm that has a high/medium risk outcome. Some of the group thought that the member should be engaging in at least some fisheries/farms within their whole sourcing portfolio, but there should be an element of trusting in others in the SSC that everyone in the group is doing their part in engaging with fisheries/farms.

#### Actions:

Secretariat to amend the code accordingly and discuss proposed changes with all members at next members meeting.

## Item 2: Transparency in risk assessment

The question was raised whether the member's own risk assessment tree that each individual business uses to make a sourcing decision should be made publicly available to be transparent.

## Discussion and comments

- The group was divided on this subject; those against making the member's own risk assessment tree publicly available argue that the way companies assess risk is commercially sensitive and, additionally, for aquaculture this information is private. It was pointed out that as this is a voluntary group there should be trust that the members are behaving appropriately. Those participants that were for the risk assessment being made publicly available felt it would be important for the interests of transparency and credibility.
- A member suggested the secretariat could conduct monitoring checks with individual members to ensure that the risk assessment exists (to help avoid sensitivity issues with making the assessment publicly available). It was then noted that the commitments in the labelling code involve competent, third party endorsement of the risk assessment, and this commitment would ensure such assessments exist. One participant noted that these commitments have not been translated into the sourcing code, and should be to ensure consistency between codes.
- There was a suggestion that individuals challenging a member's use of a responsibility claim, which has been made as a result of using options 3 or 4 (the risk assessment outcome, and member engagement), should present a case as to why they believe that claim is not true, otherwise time could be wasted responding to needless queries.
- The group discussed a new Risk Assessment for Sourcing Seafood (RASS) information resource which is being developed by Seafish. This is a development of the current Seafish Responsible Sourcing Guides and will provide an indication of the low, medium or high risk factors (not scores) associated with sourcing from a particular fishery or aquaculture supply chain. This is a business to business tool to help buyers identify what the potential risks are in a particular supply chain, but as it will be on the Seafish website it can be viewed by the public. The initial response seemed to be that RASS could be another resource for SSC and that it could be used by NGOs to fill in data gaps that they had. It was welcomed as a supplementary resource, in particular for data deficient fisheries and as a quantitative source of information. Ethical and welfare factors could also be considered if there were interest in these.
- There was a query whether the SSC will contract an independent body to check if members are abiding by the code. The secretariat confirmed that monitoring and adherence is currently undecided, but there have been previous discussions around self-monitoring within the group, and that because the codes and list of members will be publicly available, any person could conduct their own assessment of adherence to the codes if they wished and that some NGOs had indicated they may do this in future.
- The secretariat confirmed that the risk assessment is not a set template as all the SSC members risk assessments will look very different, but that the flowchart in the sourcing code illustrates the risk assessment process and outcomes members would need to go through to meet the sourcing code commitments on risk assessments.

**Agreed:**

The risk assessment methodology of the members should not automatically be made publicly available, but if challenged each member should be able to prove their case. The person or body making the challenge must present a case as to why they believe the claim is not true, otherwise time could be wasted responding to needless queries.

**Actions:**

Secretariat to amend the code to incorporate relevant commitments from labelling code on risk assessments (endorsed by independent competent third party) and discuss proposed change with all members at next members meeting.

### **Item 3: Recognition of the use of the AIPCE-CEP Principles for Environmentally Responsible Fish Sourcing in the code**

This discussion centred on whether there should be a clearer explanation of the use of the AIPCE-CEP Principles for Environmentally Responsible Fish Sourcing guidelines into the code. As the code is already based on these guidelines, it would simply need an additional sentence to clarify this.

**Discussion and comments**

The group established that this fact is already clearly referenced in the Appendix and felt this was sufficient.

**Agreed:**

No additional sentence/phrasing is required to clarify that the code incorporates AIPCE-CEP Principles for Environmentally Responsible Fish Sourcing.

**Actions:**

No actions.

### **Item 4: Base criteria listed in Appendix 1**

The discussion addressed the inclusion of additional information in Appendix 1 (base criteria for the risk assessment) such as: farmed fish feed input, AIPCE-CEP Principles for Environmentally Responsible Fish Processing guidelines, contaminants in fish, and availability of information.

## Discussion and comments

- Some felt that if these additional subjects were to be included in an SSC code, it would be in a 'processing code' and not the 'sourcing' code, but there is currently no plan for an SSC processing code.
- The secretariat clarified that the base criteria relating to waste sent to landfill was specifically on fish waste being sent to landfill as part of processing.
- It was highlighted that in existing legislation, some waste is already destined for landfill. The group were reminded that the code notes it is without prejudice to any existing laws.
- There was concern that by including fish feed into the code it would be difficult for members to show full traceability from the source fishery from which the fish component of the feed is derived. If fish feed issues were added to the base criteria, it would consequently also be added to Section 3.4. on traceability to be consistent. The concern was raised that fish being used for feed is likely to consist of off-cuts of multiple species and the process to work out the provenance of those would be highly complex and even impossible in some cases.
- It was thought that the credibility of the sourcing code would be questioned if the feed used in aquaculture is not considered.
- It was suggested that the term 'marine ingredients' should be used when describing the fish that are used to make fishmeal.
- Information on other commodities in fish feed, such as soya, may be required by the public which would increase the complexity of the risk assessment, particularly if the feed changes. It was questioned whether it would be realistically feasible to ask this of members and there was a question of who held the responsibility for the content of the feed. Some felt that the responsibility lies with the feed supplier. It was suggested that the fish feed manufacturers should be conveying an assurance up the process chain, which members could cite as their due diligence.
- It was noted that feed manufacturers are interested in joining the SSC and it was suggested this issue is not signed off before discussion with that sector so as not to preclude fishmeal makers.
- The group agreed that feed certification is becoming a bigger issue and it was discussed that fishmeal standards already exist, such as IFFO RS, and more are likely to be introduced. However, it was felt that traceability to this level would be too much for small businesses.
- Contaminants in fish, and availability of information were not discussed due to time constraints

## Agreed:

- Marine ingredients should be traceable but the information will not be publicly available. The marine ingredients would be subject to risk assessment, but not necessarily by the member, and the traceability commitments would apply to the marine ingredient component of fish feed ingredients however this would not include

a commitment to make information available on request on marine ingredients of fish feed.

- The other additional base criteria that were proposed will not be included at this time. The code is dynamic and these may be addressed in a future version.

#### **Actions:**

- Contaminants in fish, and availability of information will be discussed in the next working group meeting.
- Secretariat to amend the code to incorporate base criteria for marine ingredients in fish feed and discuss proposed change with all members at next members meeting.

## **Item 5: Sourcing of by-catch species**

This discussion concerned fish caught as by-catch from a fishery in which another species is the main target, and how this fish should be put through the risk assessment process/whether it should be treated differently to a species which is caught as a target fish. This was because base criteria that cover by-catch concerns are only related to fish caught as target species and associate by-catch with that fishery and not the issue of sourcing a species caught as unwanted by-catch itself.

#### **Discussion and comments**

- Some of the group raised the point that businesses, especially in foodservice, are under pressure to utilise by-catch species, but that it was imperative that the code did not incentivise members to target those species and create demand. Someone noted that in mixed fisheries there is often both a primary and secondary target species, so not all by-catch is unwanted.
- One participant suggested that ignoring the use of by-catch fish (i.e. wasting it) is not necessarily a suitable alternative.
- There was a suggestion that the term by-product could be used. This term is used in countries such as Australia, and defined as any part of by-catch that you can keep and use.
- A question was raised whether the issue of by-catch would link into the impending EU Common Fisheries Policy landing obligation; the group felt that the questions being asked of members cover this topic very closely. It was noted that the focus of this discussion is on species which are non-targeted and non-quota and therefore not adequately covered by the reformed Common Fisheries Policy, where it is currently still unclear whether non-quota species will be subject to the landing obligation.
- Some conditions for the use of by-catch were explored. These included:

- the need to put all by-catch species through the risk assessment process (as with all other target fish with quotas);
- including extra questions in the risk assessment process that specifically address by-catch;
- the suggestion that by-catch species should only be used if they were considered as 'unavoidable' and the need to clarify the use of the term 'unavoidable' and whether this means through current gear or best-practice criteria; and
- Survivability of the species (such as shark species like dogfish, and halibut, which have high survival rates) although it was acknowledged there are many parameters for this (seasonality, gear used, gonad index, handling etc). One participant highlighted that Cefas have already covered survivability and there was agreement in the group that sourcing should be species-related and based on considerations like survivability, but relating more to best practice at fishery level.

#### Agreed:

- It was thought that if the best gear was in use, in combination with other measures to minimise by-catch, then the sale of the by-catch could be appropriate, but this needs to be discussed further.
- Members will need to put the by-catch species through the same risk assessment process as they would target species, and this should be made clear in the code.

#### Action:

- Secretariat to organise a working group meeting to determine criteria for the sourcing of by-catch.
- Secretariat to amend the code to clarify that by-catch species must be risk assessed in the same way as any other species they source, then discuss proposed changes with all members at the next Members meeting.

## Item 6: AOB

The group asked when the Sourcing Code would be finalised and signed off and the Secretariat confirmed the aim was to complete this code in 2013.

#### Actions:

- Some typos in the code were noted and the Secretariat will correct these.
- A poll will be created and sent to members to establish an appropriate date for the next sourcing code working group meeting.