

Sustainable Seafood Coalition (SSC)

Sourcing Working Group

Location: National Council for Voluntary Organisations, London

Date: 5th September 2012

Number of Attendees: Eleven, including members and non-member advisors

Summary of Agreed Points:

- various amendments to wording of the commitments (see body of minutes);
- risk assessment process diagramme amended: changes to layout, 'actions completed' labelled as 'actions initiated' or similar, and 'continuous review' represented;
- base criteria for risk assessment to be re-phrased to guide behaviour and not to be too prescriptive and base criteria details will be in an Appendix attached to the Code (so still part of commitments rather than just guidance).

Welcome and purpose of the meeting

- On the suggestion of the Secretariat, the participants agreed to change agenda of meeting to focus on content (of code and guidance), the risk assessment and base criteria.
- Agreed objectives of meeting:
 - pinning down the content of the code;
 - discussing risk assessment diagramme to clarify the risk assessment process;
 - ensuring appropriate reference to AIPCE-CEP principles.

1. Content of the Code

Discussion of commitments and agreed points:

General comments and agreements

- Initial response to draft 2 of the sourcing code was positive from all present at the meeting.
- Concern that the objectives section is too long and repetitive, this should be amended.
- It was stressed that there are vast differences between sectors, for example foodservice businesses may have many more suppliers than retailers. Therefore although the guidance for each sector will need to be tailored, it is nonetheless important for all sectors to have the same high-level commitments within the Code.
- Members agreed that, in general, the commitments had the right level of detail, and that further information should be in the guidance document.

- Comments received by a member unable to attend the working group were shared (see box below), including comments on the role of the SSC, elements of which it was agreed should be incorporated at the start of the Code. Some Members did not agree with all of the points e.g. on short term profit reductions and points on certification, mainly because they were too sector-specific.

Agreed points:

- The role of the SSC should be defined and this should be incorporated into the document in an additional narrative introduction.
- The numbering system will be amended to make the Code easier to read.

Summary of comments sent by Member in advance of the Working Group

- Concern that version 2 of the Code as it stands would edit out many responsible supply chains.
- An introduction at the start of the Code should detail the motivation of the SSC and its role in relation to sourcing.
- Members' role is to influence behaviours not control them.
- Role of SSC:
 - To take away market demand for the worst managed fisheries and farms. Withdrawing from the worst managed fisheries that we cannot justify supporting e.g. bluefin tuna or shark fin soup.
 - To provide a market incentive for change by promoting certified seafood and supporting well managed fisheries and farms (note, this is to create a market demand in the short term and a consumer one in the longer term).
 - Running consumer education programmes about certified seafood to incentivise them to make positive choices.
 - To help fund certification by providing markets for their products at a profitable price including the costs of certification.
 - To fund certification directly when it makes economic sense.
 - To sell certified seafood with the logo to educate consumers and provide a positive choice, assuming consumers are happy to pay any premiums.
 - To engage in the setting of standards and assist in the operation of certification schemes for both wild capture fisheries and aquaculture.
 - To actively market demonstrably sustainable seafood even if it is not profit enhancing in the short term.
 - To use the best scientific information available to risk assess all our supply fisheries and determine which need improvement; to act on this knowledge by collectively calling for improvements to be made by relevant regulators and managers (including helping to assess wealth generating capacity of the fishery once it is fully recovered; agreeing joint campaigns with relevant NGOs to achieve long term changes required; in some cases act together with those in our supply chain to provide funding and support for local or regional fishery improvement including macro fishery management measures and improvements such as data collection, bycatch mitigation and associated

Transparency

- It is important to be able to explain sustainable practices and show that a) a business sources from these responsible sources; and b) there are traceability systems and controls in place to ensure that the business is sourcing from these places.
- A Member suggested it is important to get businesses/consumers to understand how to make correct decisions. This could include a clear website, possibly leaflets for restaurants/chefs to

ensure those people know how to ensure they are serving sustainable fish. However, it is also important not to overload people with too much information.

- However, it was felt that points in the Code on specifically how information should be made available to the public (e.g. posters, website etc) are too prescriptive and should be in the guidance document.

Agreed points:

- Specific suggestions for how to make information available to the public to be moved to guidance.
- The Code should not mean that Members would need to disclose commercially confidential information.

Traceability

- Several Members raised the issue of how to prove traceability without releasing confidential commercial information. Point reiterated by Members that it would not be possible or desired by some companies to release specific information about each fish i.e. time and vessel caught by. Members stated that generally consumers are not requesting such information.
- A Member suggested that the Code should cross-reference the traceability principles contained in the AIPCE-CEP document. However, other Members felt that that it would be confusing to cross-reference to AIPCE-CEP and the code needs to stand alone which was agreed with.
- A question was raised about IUU fish: Are EU law prohibition and AIPCE-CEP requirement that IUU fish should not be brought into the EU sufficient to ensure that IUU fish is not sourced? It was commented that although the legal infrastructure is there, and the situation has improved, IUU fish is still a problem and should therefore be addressed by the Code.
- Highlighted that it is possible for legally caught fish to come from a fishery which also has elements of IUU fishing.

Agreed points:

- Point on avoiding IUU fishing: wording to be changed e.g. “No fish likely to be product of IUU fishery”.

Legality

Agreed points:

- Legal commitment to stay as corporate responsibility goes beyond the law and different sectors and businesses may have differing degrees of knowledge of applicable laws.

Coherence

Agreed points:

- Point on consistency with future SSC Codes to be made into a separate statement.

Cooperation and Collaboration

- Issue raised by one Member about taking part in other initiatives and what this means. Members agreed that this should remain in the Code, but may need to be explained more clearly.

Communication

Agreed points:

- The communication and communicating the Code sections should be combined.

Leading the way and influencing wider progress

Agreed points:

- Point to be inserted r.e. non-commercially sensitive scientific and useful information should, where appropriate, be shared with the public e.g. through the SSC website.

Regular review

- Current content agreed by all present.

Other commitments

- Concern that the 'other commitments' section was confusing. It was made clear that this point was intended to refer to industry and NGO initiatives e.g. MCS, AIPCE-CEP, Seafish etc.
- It was felt that this point should be clarified and incorporated under the coherence commitment.

Information Gathering

- Members felt that this section is too general and requires more structure including with regard to where to find information, with sound science at the top of the list and news at the bottom.
- It is important to differentiate between different types of information, some of which should be used to inform sourcing decisions and other information which is merely informative (e.g. media articles).

Risk assessment (see also sections below on risk assessment process and base criteria)

- Suggestion that the base criteria should go into a new appendix, as they form part of the core commitments in the code, but in the body of the code's text they impede the flow of the code because too detailed. Moving them to guidance would be inappropriate.

Agreed points:

- Risk assessment base criteria detail to be put in a new appendix (not in guidance document).

Content of sourcing policies

Agreed points:

- To be moved to the start of the sourcing policies section (i.e. before information gathering)
- Explanation that transparency, traceability, regular review, communication and appropriate risk assessment are core elements of a sourcing policy.

2. Risk Assessment Process diagram

Risk assessment diagramme was produced at the last working group to illustrate the sourcing decision making process. Some amendments were required as the diagramme combines process and functionality, so is not easy to follow. See below for original and amended versions.

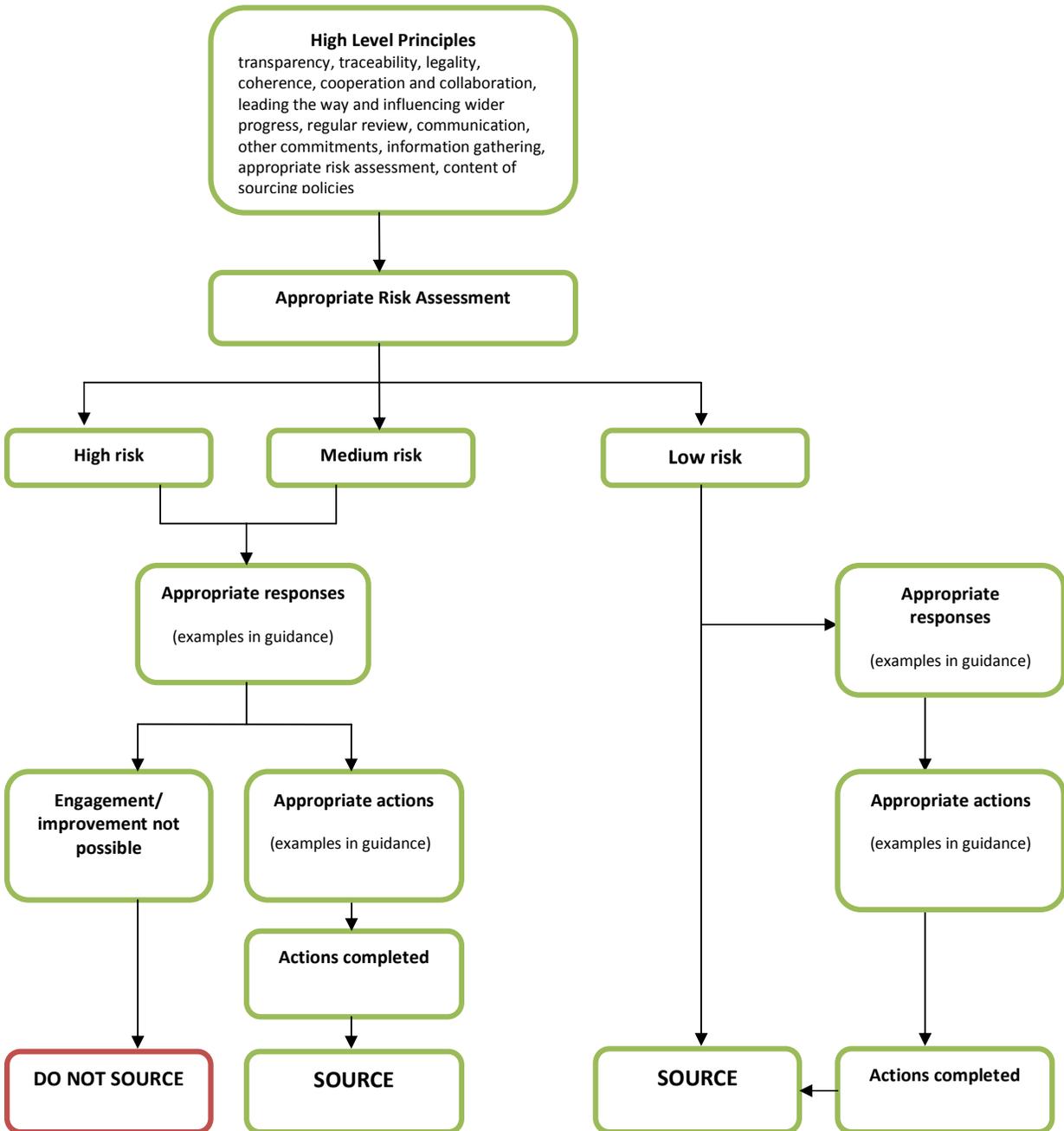
Discussion and agreed points

- There should be a logical progression from the sourcing code to the labelling code, so a decision is made on whether to source the product, and then whether it can be labelled as 'responsibly fished/farmed/sourced' or 'sustainably fished/farmed/sourced'.
- A number of Members were concerned that, the proposed diagrammatic reproduction of the way sourcing decisions are made under the code would lead to the need to have completed (rather than be in the process of/be engaged in taking) the relevant 'appropriate actions' (see diagramme). It was clarified that engagement with a fishery should be allowed while improvements are identified and in progress.
- Certification should not be viewed as a substitute for responsible fisheries.

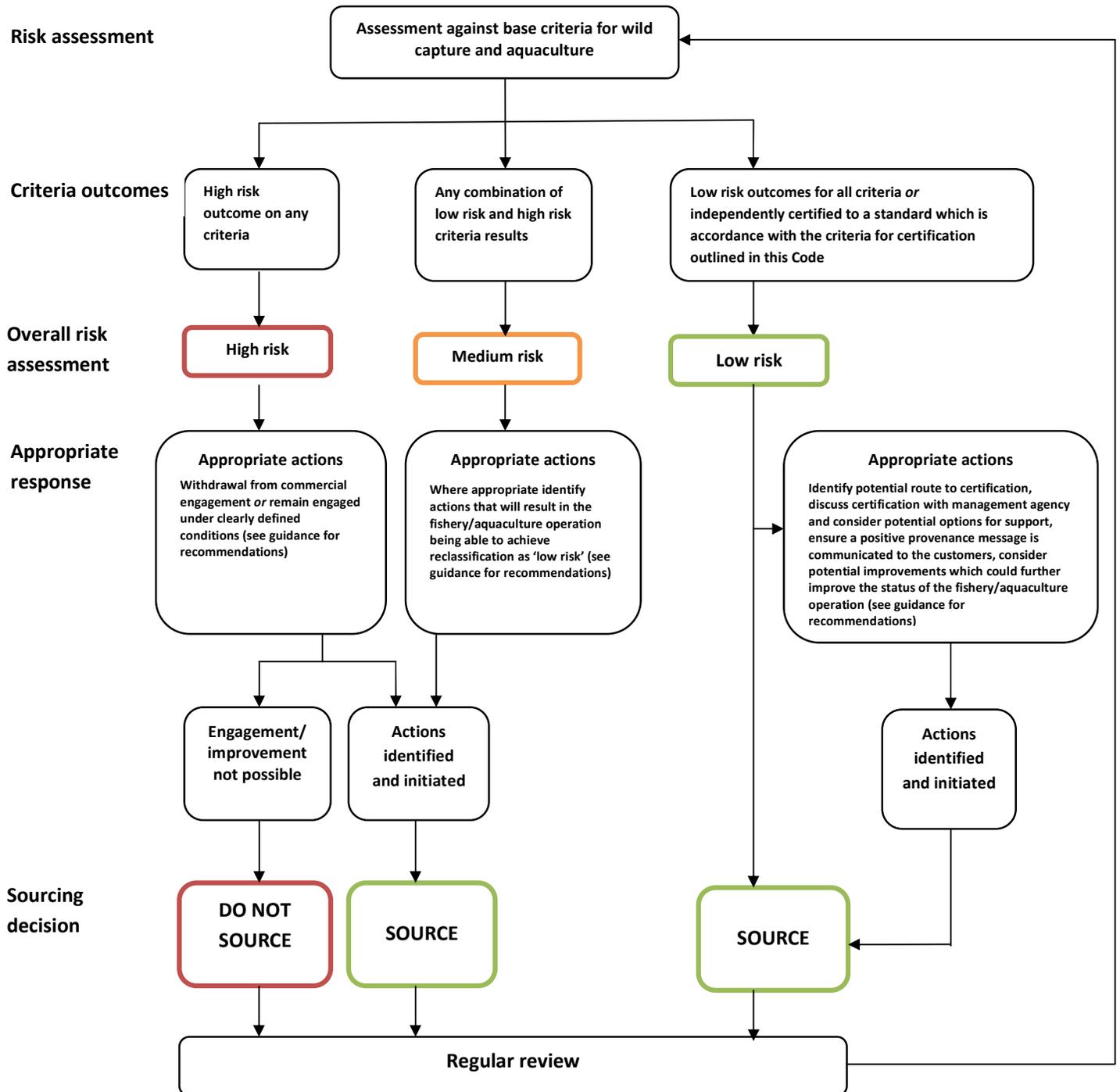
Agreed points:

- The current level of detail in the diagramme is acceptable – reference to AIPCE-CEP should go in the text of the Code. 'Actions completed' to be amended to 'actions in progress or identified'.
- The 'do not source' option should stay in.
- Agreement with the revised flow chart which was handed out. Main change in the revised flow chart was that the 'appropriate responses' box was moved to a side column.
- Addition of 'regular review' to the chart.
- A proposed approach for overall risk assessment outcomes (e.g. taking into account outcomes for each base criteria) will use the AIPCE-CEP definition of risk status definition (see pg 6, AIPCE-CEP principles for environmentally responsible fish sourcing).

Original: Risk assessment and sourcing decision process



Amended: Risk assessment and sourcing decision process



3. Base Criteria

Discussion and agreed points

- Concern that the Code will invent a risk analysis metric. The SSC is not a standard and should not be prescriptive about risk assessment decisions; rather the Code should act as a guide to the process. Members felt it would be more appropriate to phrase base criteria as considerations that need to be taken into account and will act as a guide to the assessor. It should not be the aim of this Code to prescribe how decisions are reached by individual Members. It was pointed out that Members should be free to make decisions based on the risk they are willing to accept.
- Risk assessments must be suitably robust to ensure that responsible sourcing decisions are made.
- Advice on what might constitute a high/medium/low risk result will be included in guidance, with a list of possible information sources including NGO advice.
- Members agreed that it is important that risk decisions are transparent.

Agreed points:

- Base criteria points to be re-phrased as considerations that need to be taken into account (e.g. as questions). A point will be inserted about the need for robust and transparent risk assessment decisions.
- 'Water use and waste' should be included under aquaculture criteria, not wild caught criteria.
- The phrase 'SSC principles of sustainability' to be removed and point rephrased, as potential source of confusion.
- 'Wild stock fish health': point one 'the most recent scientific advice on the health of the stock suggests that the stock is not overfished' should also include 'or recovering from overfishing'.
- All agreed that there should be reference under aquaculture criteria to link back to wild fish criteria, to incorporate the issue of fish feed from wild sources.

Next steps

- Secretariat to draft version 3 and gain feedback.
- Members are encouraged to send ongoing comments to the Secretariat.