

Sustainable Seafood Coalition (SSC) Members' meeting minutes

Date: 24 July, 2013

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

Number of attendees: 10 total (including 5 ClientEarth staff acting as facilitator, member, secretariat and minute takers)

Summary of key concerns and agreed points

Item 1: Key Concerns

In response to feedback from a number of SSC members, this meeting was changed from its original purpose (addressing public feedback labelling code) to address issues and potential solutions surrounding the following instead:

- The need for more simplicity in the draft labelling code;
- The practicability of the labelling code's 'alternative' route to sustainability claims (Option 2) - other than certification to third party standard;
- The need for non-member expert involvement in SSC working groups; and
- Governance structure / decision making.

Item 2: Simplification of the code and sign-off

- Without changing the agreed fundamental principles of the labelling code, its structure, layout and presentation will be simplified by the secretariat with the help of the suggested summary from an SSC member. The bulk and detail of the commitments will be placed in annexes.
- The secretariat will re-draft and simplify the labelling code as per agreements in this meeting and then circulate and discuss with those present at this meeting who were willing to give initial comments. The draft code will then be amended again if necessary, and presented as a new version at the next full members meeting.
- As a result of the outcome of this meeting, coupled with low availability for the previously suggested date of 5 September, the next SSC members' meeting will be rescheduled to the end of September in order to take place after the food-service members meeting. Members present did not want the meeting any later, as they were keen to sign off the code.

Item 3: Option 2 for claims regarding sustainability

Small and medium enterprises (SMEs) do not always have the capacity to research or interpret information and then make a judgement on the sustainability of a fishery or farm themselves. Therefore Option 2 for sustainability needs to be re-addressed with this in mind, building in flexible routes which SMEs may take to satisfy sustainability criteria (for example through self-auditing where they have expertise or can seek assistance, or through the use of NGO fish list advice, or through risk assessment outcomes).

Item 4: Non-member expert involvement in working group meetings

- Non-member experts invited to SSC working group meetings have provided very valuable input to the development of the labelling and sourcing codes. However, issues have arisen where different or new representatives attend working groups, resulting in a lack of progress due to repeated requests to cover basic concepts.
- The extent of involvement of non-member experts in working group meetings will be re-addressed at a later date to determine whether, for example, the SSC should insist on the one named representative attending related meetings each time.

Item 5: Governance structure and communication

- SSC emails from the secretariat need to be more concise, with action/information subject headers and summary points of what is required at the start.
- The formulation of an SSC steering group needs to be discussed further at a SSC-governance focused members meeting.

Purpose of the members' meeting

This meeting was initially intended to address the use and acknowledgement of the AIPCE-CEP Principles for Environmentally Responsible Fish Sourcing in the labelling code. However, the meeting's agenda changed in response to feedback from several members. It was agreed that the meeting should discuss ideas to help progress with labelling code sign off and a number of related issues (see Key Concerns, below).

Item 1: Key Concerns

The meeting opened with a summary of concerns that had arisen, including:

- The perceived increasing complexity of the labelling code, which could lead to the code appearing to be more like a 'standard' than a voluntary code, thereby losing the original spirit behind the code - members working together voluntarily to harmonise labels across the seafood industry;
- The need for simplification and for the code to be more understandable at first reading;

- Time constraints on members regarding the involvement in meetings and dealing with e-mails;
- Ongoing issues within the code that need to be resolved (including the use and references to the AIPCE-CEP Principles for Environmentally Responsible Fish Sourcing, and the cost implications of the labelling code's 'alternative' route to sustainability claims other than certification to third party standard (Option 2 for sustainability));
- The differences in operation and logistics between the food and retail/processing sectors; and
- The issue of working group meetings, where some non-member experts send different representatives each time (due to job or position changes) which has resulted in the questions which were previously discussed being constantly reopened - this can be a hindrance to progress.

Discussion and comments

Following the summary of issues to be discussed, each participant voiced their key concerns. Additional issues to those already summarised included:

- The potential for having an option for SMEs to self-audit to justify sustainability claims for Option 2 for sustainability in the labelling code. For example, the foodservice sector often source in small quantities and more directly going as far, in some cases, as buying directly from a fisher; large retailers and processors, on the other hand, buy in orders of magnitude more, with inflexible quantities or deadlines, where audit trails are essential for traceability. Therefore, it was proposed that the code should allow some flexibility for SMEs that are building more sustainability into their sourcing decisions and behaving in a way that supports sustainable practises from local, small, inshore UK fisheries.
- There was a desire for the code not to resemble a standard but to encompass the spirit of self-motivated industry progress and willingness, as originally intended.
- One member felt the code should allow for fresh, local (UK) fish to be able to be classed as sustainable, where appropriate, even though there are no certified options for many of these species; this would mean that Option 2 must be a viable alternative.
- There was a desire to set date for signing off the labelling code and to set a goal for completion (see Item 2).
- There was a request for fewer and more concise e-mails from the secretariat (see Item 5).

Agreed:

The list of problems and topics that need to be addressed in this meeting were the simplicity of the code, Option 2 for sustainability, NGO involvement and governance structure/decision making.

Item 2: Simplification of the code and sign-off

Members have expressed their concerns over the time taken to formalise and agree on the labelling code, and would like the code to be signed off in the coming months. The last two years have proved very constructive in formulating the code and agreeing on a number of points, and the last version of the code was agreed by all members and released for public feedback. The key concern now is to agree on any outstanding issues as quickly as possible, so that members can sign off the code and start implementing it.

There have been requests for simpler wording for the code both for the end user (e.g. an SSC member's marketing team) and other stakeholders (e.g. NGOs and the public). Once the code is implemented, it will be the responsibility of individual businesses to defend their own claims of sustainability, so it is imperative that it can be clearly understood. The logistics of how to implement the code and how it will be regulated was also discussed.

Discussion and comments

- Regarding sign off, one participant suggested the process could be in stages so that not all members would have to sign up to the code immediately. This could allow for those relying on Option 2 for sustainability to wait until a solution is found without stopping those who are ready to sign up to begin implementation. However one participant voiced concerns that this could cause more frustrations because a) there would be a danger of sustainability claims meaning different things because of the unparalleled process in developing the two options (which would defeat the purpose of the code- that is terms having a consistent meaning); and b) when the solution for Option 2 is found, all members would still need to agree this new amendment to the agreed code, and this would involve yet more time from members.
- One member suggested that to help implement the code, a decision-making tree/flow chart could be created to help members see the steps they need to take and questions they need to ask internally before claims can be made under the code.
- The group discussed how members will justify claims they make. The code states that it will be down to each individual business to make those justifications. It is likely there will also be a certain amount of peer pressure and intra-member regulation of claims within the SSC.
- One participant suggested that having the minimum criteria for sustainability and responsibility clearly listed in the code, for example in summarising bullets, would be useful for members of the public. In addition, these could hyperlink to the more detailed requirements when the code is online and these details were proposed to be in an annex.
- One member read out a suggested simplified summary of the code. There was a consensus that it effectively summarised the spirit of the code and would be understandable to all.
- The group discussed the need for members to show and explain why products are responsible / sustainable and to be accountable for such claims. Challenges may

come from NGOs accusing the SSC of 'green-washing', or querying how this voluntary code is policed. The group agreed that all members have demonstrated a wish to be a part of the SSC, and therefore they do want to make these commitments voluntarily; these are not new risks to businesses.

- There was a request to set a target date for signing off the code, but this was not possible as all members are needed for this kind of decision.

Agreed:

- Without changing the agreed fundamental principles of the labelling code, its structure, layout and presentation will be simplified by the secretariat with the help of the suggested summary from an SSC member. The bulk and detail of the commitments will be placed in annexes.
- As a result of the outcome of this meeting, coupled with low availability for the previously suggested date of 5 September, the next SSC members' meeting will be rescheduled to the end of September in order to take place after the food-service members meeting. Members present did not want the meeting any later, as they were keen to sign off the code.

Actions:

- The secretariat will re-draft and simplify the labelling code as per agreements in this meeting and then circulate and discuss with those present at this meeting who were willing to give initial comments, before being amended again if necessary, and presented as a new version at the next full members meeting.
- The secretariat will re-arrange the next member's meeting for the end of September.

Item 3: Option 2 for claims regarding sustainability

The group discussed whether the criteria for Option 2 for sustainability claims are useable. The minutes from the members meeting on [11 June](#) show that this option is currently unusable for both larger businesses and small and medium enterprises (SMEs), but that an alternative to independent certification is needed for claims of sustainability.

Discussion and comments

- The group discussed a suggestion that there should be different requirements for SMEs.
- A suggestion of self-audits rather than independent audits for SMEs was made (as stated in Item 1).
- Participants voiced concerns that most SMEs do not have the capacity or expertise to identify whether a fish or seafood is from a sustainable stock. Making sense of ICES stock data or Cefas' information to make such a judgement, for example, cannot be reasonably expected from all members. Therefore this needs to be accounted for in the redrafted Option 2.

- One participant explained how they offer support to their own members regarding sustainability measures including introducing useful contacts and helping the business formulate a sustainable policies. If information could be made available to SMEs that helped them know which questions to ask and who could provide relevant information, they would be better placed to make informed decisions. One participant noted that a certain level of investigation will be required and that members do need to invest time and effort to help drive the way for sustainability.
- Additionally, although some fish lists by NGOs are clear and accurate, they are not exhaustive and do not cover the full range of species sourced by SSC members.
- There was a suggestion by a participant that SMEs could use advice from NGOs who produce fish lists (as long as these lists were reviewed on an annual basis). One concern expressed about this suggestion was that there is a danger some of these NGOs may have vested agendas on particular topics that influence their ratings.
- Another suggestion was that SME members use a suitable risk assessment (as per commitments in the responsibility section) and if the fishery/farm has a low risk outcome, then a sustainability claim could be made. In the current version of the labelling code, it was felt that scenarios could exist where a fish or seafood could be sourced from a low risk fishery, but due to it being a data deficient species, or not being independently certified, it could not be labelled as sustainable. [Under the labelling code, an example of this would be hand dived scallops]. Therefore the group felt there is a need for a flexible self-auditing approach to be allowed so that, for example, a risk assessment with a low risk outcome could result in claims of sustainability being made.
- It was proposed that the different routes of how Option 2 could be met could be explained in the guidance document accompanying the code.

Agreed:

SMEs do not always have the capacity to research or interpret information and then make a judgement on the sustainability of a fishery or farm themselves. Therefore Option 2 for sustainability needs to be re-addressed with this in mind, building in flexibility in the routes which SMEs may take to satisfy sustainability criteria (for example through self-auditing where they have expertise or can seek assistance, or through the use of NGO fish list advice, or through risk assessment outcomes).

Actions:

Secretariat will re-draft Option 2 for claims regarding sustainability to reflect the agreed points and discuss the proposed changes in the next members' meeting

Item 4: Involvement of non-member experts in working group meetings

The secretariat has received feedback from members that the involvement of non-member experts with working groups has been imperative for the drafting of the codes, but at this stage there is a concern that in some working groups it has been slowing down progress and has not been constructive.

Discussion and comments

- Some members thought that the issue now is non-member experts' levels of engagement in SSC working groups. If non-member experts were not involved, there would be a risk of misinterpretation and a potential lack of expertise in developing the codes. It was also raised that non-member experts are not commercial entities and may have diverging goals from the SSC.
- Issues have arisen where different or new representatives attend working groups, resulting in a lack of progress due to repeated requests to cover basic concepts that have been discussed in previous working group meetings.
- There was concern that non-member expert involvement, and the detailed response from the public feedback period, may be why the code has taken a more prescriptive route than had been originally agreed. However, there was widespread agreement that this feedback period was essential and constructive.
- There was an appreciation that non-member experts being part of the process may have prevented the SSC from missing some fundamental issues. Members also felt it was important that the SSC is able to demonstrate that it has been participatory.
- A member thought there should be clarity on what the code is and what it is not, with particular reference to the fact that the code is not a standard.

Agreed:

- Non-member experts invited to SSC working group meetings have provided very valuable input to the development of the labelling and sourcing codes. However, issues have arisen where different or new representatives attend working groups, resulting in a lack of progress due to repeated requests to cover basic concepts.
- The extent of involvement of non-member experts in working group meetings will be re-addressed at a later date to determine whether, for example, the SSC should insist on the one named representative attending related meetings each time.

Actions:

The secretariat will add this to the agenda for an SSC governance-focus members meeting.

Item 5: Governance structure and communication

Feedback suggests that e-mails are too long and can be unclear. Members were asked if they had any constructive contributions to help the SSC secretariat improve the structure of e-mails sent to members.

Discussion and comments

- Suggestions included reducing the length and the quantity of e-mails; being more concise (for example a clear list of points at the start that need a decision); adding 'For Action/ For Info' in the subject title, and adding a date by which a response is required.
- In response to the length of emails, it was also raised that it may be beneficial to talk in smaller governance/steering groups, as people prefer to make choices at meetings rather than by e-mail; this will be discussed at a future SSC-governance focused meeting.
- There was a suggestion that longer meetings are needed and that these should result in concrete decisions. However, meeting length has been discussed and agreed in previous members' meetings with the outcome that shorter meetings were preferred. This highlights the challenge in trying to find solutions to suit all members and the importance of revisiting governance structure as the Coalition grows.

Agreed:

- SSC emails from secretariat need to be more concise, with action/info subject headers and summary points of what is required at the start.
- The formulation of an SSC steering group needs to be discussed further at an SSC-governance focused members meeting.

Actions:

- The secretariat will take on the constructive points regarding the structure and content of SSC e-mails as much as possible and put these into effect immediately.
- The secretariat will organise a governance-focussed SSC members' meeting.