

Sustainable Seafood Coalition (SSC) Members' meeting minutes

Date: 25 June, 2014

Location: The Counting House, 50 Cornhill, London EC3V 3PD

Number of attendees: 14 total (including 4 ClientEarth staff acting as facilitator, member, legal advisor, and minute taker)

Summary of agreed points

Item 1: Sourcing Code - traceability to vessel of origin

- Traceability to vessel of origin will not be included in the sourcing code, and will be added into the guidance as best practice for a fishery of any size.

Item 2: Sourcing Code - cetaceans

- Members will take any action regarding the impact of their sourcing decisions on whales and cetaceans independently of the SSC.

Item 3: Sourcing Code - aquaculture zones

- A reference to aquaculture zones will be added into Section 4.2 of the guidance, where aquaculture boundaries are already discussed.

Item 4: Sourcing Code - minor amendments

- The words 'and seafood' to be added to the code, making the sentence read 'This code covers the sourcing of all fish and seafood (hereafter 'fish')'.
- The suggested amendment to Section 3 was rejected and the original wording retained.
- The arrows in the decision trees will be separated to increase clarity of the connections between boxes.

Item 5: Sourcing Code - certification standards

- The words 'Audits and' will be added to Section 4.3 to read 'Audits and risk assessments will include a review of'.

Item 6: Labelling Code – certification requirements

- A sentence will be added to the labelling code stating that 'members will adhere to the terms and conditions of third party certification schemes'. A more detailed explanation of what this entails will be added to the guidance.

Item 7: Labelling Code - 95% commitment

- The wording of the 95% commitment will be amended to cover both responsibility and sustainability, and the paragraph moved into the correct part of Section 4 of the code to reflect this.

Item 8: Guidance - redraft group

- A redraft group will meet to discuss feedback and make any required changes.

Item 9: Responding to feedback

- Individual responses will be sent to each organisation that provided feedback.
- Additionally, a general response to the feedback will be posted on the website, containing anonymised, themed comments and an FAQ section to deal with common misunderstandings and queries.

Item 10: Committing to the codes

- Members will commit to the codes via an email to the secretariat by a specified date, followed by a public-facing external launch to occur at a later date.

Item 11: SSC launch strategy

- The secretariat will take the comments raised by members back to its communications team for further strategy development.
- Members will supply the secretariat with the contact details for members' own communication teams if they have not done so. Where they do not have specific press staff, the SSC representative will be the main contact.

Item 12: SSC logo use

- Wording regarding how members may use the SSC logo, based on the examples presented (see main text), will be added to the terms of reference.

Purpose of the members' meeting

The primary purpose was to discuss comments received on the SSC Codes and guidance during the public feedback period and to agree the final wording of the sourcing and labelling codes. Additional aims of the meeting were to discuss implementation plans, SSC logo use and the launch strategy. Finally, Dr. Alex Caveen from Sea Fish Industry Authority (Seafish) updated the group on the Risk Assessment for Sourcing Seafood (RASS) tool.

Item 1: Sourcing Code - traceability to vessel of origin

Some of the feedback received in response to public consultation on the codes requested that members commit to traceability of fish back to the vessel of origin, rather than to the fishery of origin, which is the requirement in the draft sourcing code. Members discussed five potential solutions that were proposed by the secretariat.

Discussion and comments

- Several members felt it may be an unrealistic expectation. Not all members have the infrastructure in place to trace fish back to the vessel of origin and that for some very small fisheries it is actually impossible to get information down to the vessel level.
- Members discussed how tracing catch to the vessel is currently possible for larger fisheries and that achieving this degree of traceability in all fisheries was a good long term aim.

Agreed:

Traceability to vessel of origin will not be included in the sourcing code, and will be added into the guidance as best practice for a fishery of any size.

Actions:

The secretariat will amend the guidance as agreed.

Item 2: Sourcing Code - cetaceans

Feedback received requested that the code should commit members to not source from any supplier linked directly or indirectly to hunting whales or cetaceans. Members discussed five potential solutions proposed by the secretariat.

Discussion and comments

- SSC members do not condone the hunting of cetaceans.

- Several members felt this issue was outside the scope of the SSC, as it is not referring to fish or seafood directly, and believed it was a decision to be made by individual businesses rather than jointly.
- A member raised the point that in addition to whaling, there are other areas of concern for businesses sourcing fish and seafood (e.g. seal culling, forced labour). These are beyond the scope of the SSC but due to the importance of these issues, many businesses develop position statements independently.
- One member felt that the request to not source from any businesses directly or indirectly connected with hunting cetaceans could be very difficult in practice for tenuous or indirect links.
- Several members stated that they already deal with these issues directly, and any that do not currently do so may respond individually to the stakeholder's letter of invitation.

Agreed:

There was unanimous agreement that members would take any action regarding the impact of their sourcing decisions on whales and cetaceans independently of the SSC.

Actions:

The secretariat will send a response to the contributor of the feedback and members will contact them directly if they wish to continue the discussion in relation to their business.

Item 3: Sourcing Code - aquaculture zones

Feedback received requested that the code should include specific reference to the management of aquaculture on a larger geographical or 'zonal' scale, as focus at farm level alone may miss important environmental impacts at a regional level. Members discussed five potential solutions proposed by the secretariat.

Discussion and comments

- One member stated that the code is designed to establish general principles and that this is quite a specific point, which is not relevant to all aquaculture (for example land-based systems).
- A member raised the point that 'aquaculture zones' are still a developing concept and there is no agreement as to what the 'zone' boundaries should be (e.g. political boundaries or water bodies). As far as the members were aware, certification schemes do not yet include zonal aquaculture so it would be difficult for the SSC to include this as a platform for decision-making.
- Members felt that it could be referred to in the guidance alongside a qualifying statement that it is a developing concept. A second member questioned whether it

should even be put in the guidance or revisited in the next version of the guidance when it may be further defined.

Agreed:

A reference to aquaculture zones will be added into Section 4.2 of the guidance, where aquaculture boundaries are already discussed.

Actions:

The secretariat will amend the guidance as agreed.

Item 4: Sourcing Code - minor amendments

The group discussed three additional changes based on comments from feedback. Firstly, the addition of 'and seafood' to Section 2 of the sourcing code to clarify the sentence 'this code covers the sourcing of all fish'. Secondly, clarification of the wording in Section 3 regarding the use of risk assessment outcomes to inform purchasing decisions. Finally, reformatting arrows on the decision trees to increase their clarity.

Discussion and comments

- Regarding the first point: the codes cover all fish and seafood, and this specific wording must have been lost from the sourcing code during the redrafting process. It is still present in the labelling code and guidance. Members felt the words 'and seafood' could be reinserted to the first instance fish is mentioned, with a qualifying statement (such as 'hereafter referred to as fish') as in the guidance document, but not included in every instance.
- Regarding the second point: members discussed amending the sentence '[t]his includes use of risk assessments to make purchasing decisions based on the outcome.' in Section 3, to increase clarity. An alternative suggestion received during feedback was 'This includes use of risk assessments, the outcome of which will inform purchasing decisions'. Members discussed whether 'inform purchasing decisions' has the same meaning as '[make purchasing decisions] based on the outcome'. Some members felt that the word 'inform' is better because it leaves room to purchase from high-risk fisheries providing the decision was justified through an engagement plan.
- Members pointed out that in isolation the existing wording could suggest that risk assessments are the sole basis of purchasing decisions. The group concluded however, that when read in context with the preceding sentence ('Members commit to the responsible sourcing of all own-brand fish by following good practice as outlined in this Code.') it was clear that risk assessments were not the sole basis of decisions.
- Members had no issues with changing the format of the arrows in the decision trees.

Agreed:

- The words 'and seafood' to be added to Section 2 of the sourcing code, making the sentence read 'This code covers the sourcing of all fish and seafood (hereafter 'fish')'.
- The suggested amendment to Section 3 was rejected and the original wording retained.
- The arrows in the decision trees will be separated to increase clarity of the connections between boxes.

Actions:

The secretariat will amend the sourcing code as agreed.

Item 5: Sourcing Code - certification standards

Feedback highlighted that minimum criteria for certification standards were not present in the sourcing code, but requirements for audits and risk assessments are listed in Section 4.3. Members discussed whether the current content and wording of this section were clear enough or whether they could be improved.

Discussion and comments

- A member raised the point that the guidance specifically outlines minimum criteria for certification schemes.
- A member suggested amending the wording in Section 4.3 of the code could reinforce the point that we have minimum standards for certification bodies, avoiding potential future questions from stakeholders as a result.
- A member felt that a change was not necessary as this was already covered in the guidance.
- One member suggested the words 'Audits and' should be added to the sentence in Section 4.3 to read 'Audits and risk assessments will include a review of'.
- A member argued that during the sourcing risk assessment, members are advised in the guidance to look at the certification and audit process or the certification scheme, and that this would include the minimum criteria.

Agreed:

The words 'Audits and' will be added to Section 4.3 to read 'Audits and risk assessments will include a review of'.

Action:

The secretariat will amend the sourcing code as agreed.

Item 6: Labelling Code - certification requirements

During feedback, several respondents were concerned that the code did not specifically state that members are required to adhere to trademarked logos, names or other requirements of certification schemes. The secretariat presented members with a draft paragraph, which could be inserted into Section 2 of the code and / or Section 7.1 of the guidance to clarify that members will adhere to the terms and conditions of standard setters.

Discussion and comments

- A member felt this requirement is a given and does not need to be included as the code is supposed to be a simple document that is easy to understand. A paragraph such as the one suggested might overcomplicate it.
- Several members felt that this issue refers to an agreement made between a certification body and its user, and is not a group issue for the SSC.
- Members agreed that where certifications are being used to justify claims, they would comply with the agreements set by the certification body.

Agreed:

A sentence will be added to the labelling code stating that 'members will adhere to the terms and conditions of third party certification schemes'. A more detailed explanation of what this entails will be added to the guidance.

Actions:

The secretariat will amend the labelling code and the guidance as agreed.

Item 7: Labelling Code - 95% commitment

Feedback indicated opposing views regarding the 95% commitment. One was that the 95% commitment should, for consistency, also cover claims of responsibility and not just sustainability. The other disagreed with the principle of this commitment, stating that a small percentage constituent of fish that has not been responsibly sourced, in many packs of fish sold, would lead to a significant cumulative total.

Discussion and comments

- Several members commented that many certification bodies, including MSC and ASC, as well as other food regulations and standards include this benchmark for processed fish foods. Using this in the SSC codes thus would align it with industry standards.
- Members all aim for 100% compliance and did not agree this commitment is a loophole to allow sourcing from illegal, unreported and unregulated fisheries or

using threatened, endangered or protected species. Additionally, a member stated it would not make business sense to source these species to make up small margins.

- A member discussed the relevance of this to foodservice in terms of leftover fish ingredients used to produce another product (such as a fish cake). The member would like to have the option to use claims of responsibility or sustainability, and it was clarified the terms can still be used in relation to specific fish ingredients if necessary (e.g. fish cake with sustainably sourced haddock).

Agreed:

The wording of the 95% commitment will be amended to cover both responsibility and sustainability, and the paragraph moved into the correct part of Section 4 of the labelling code to reflect this.

Actions:

The secretariat will amend the labelling code and the guidance as agreed.

Item 8: Guidance - redraft group

Many comments and suggestions for the guidance were received during the feedback period. Members discussed where and when a redraft group could meet to discuss these and implement any changes required in the guidance document.

Discussion and comments

- Two members agreed to attend the meeting in person, and several members agreed to correspond via email to answer specific questions that may arise.

Agreed:

Redraft group to meet to discuss feedback and make any required changes.

Actions:

The secretariat will coordinate with relevant members by email.

Item 9: Responding to feedback

The members discussed how the secretariat should respond to the feedback received on behalf of the SSC.

Discussion and comments

- A member suggested that the SSC should respond publicly to the feedback on a point-by-point basis but other members believed feedback should be generalised

into themes, made anonymous, and a response written for each theme. Individual responses to each stakeholder should also be sent.

- A member suggested that a Frequently Asked Questions (FAQ) page on the SSC website be updated based on the feedback to tackle recurring questions such as 'why do the codes not cover social and ethical issues?' and 'why the SSC is not an industry standard?' It should include metrics on the number of meetings and range of stakeholders involved to show that developing the Codes has been an open process.
- A member reminded the group that the SSC should be proud of its achievements so far and its contribution to improving the UK seafood industry.

Agreed:

- Individual responses will be sent to each organisation that provided feedback.
- Additionally, a general response to the feedback will be posted on the website, containing anonymised, themed comments and an FAQ section to deal with common misunderstandings and queries.

Actions:

- The secretariat and one of the members will draft response emails and reply to each stakeholder that contributed.
- The secretariat will update the SSC website with an anonymised summary of feedback received with SSC response, and develop an FAQ section.

Item 10: Committing to the codes

Members discussed who of those present would be committing to the codes, how the process should be structured and what form the formal sign-off should take.

Discussion and comments

- The secretariat stated that the implementation stage will be different for each member, depending on their business type and the number of fish products they source and sell. However, members should set a target date or dates within which all members will be compliant.
- A member asked whether full implementation would have to be achieved before signing-off the codes. The secretariat confirmed that the date of sign-off is a commitment to start implementation of the code and that full compliance is not required before sign-off.
- One member felt that if potential new members are not currently aligned with the codes and wish to sign them off there may need to be a defined period of time after which implementation must have been achieved.

- One potential delay with conforming to the labelling code comes from current label stocks. Changing these labels should take no longer than 12 months, except for frozen fish products, which could be up to 18 months.
- Getting independent third party endorsement of fisheries and farms would potentially take longer than a year [Note from secretariat: this is not a minimum requirement of the codes and would go above and beyond the commitments].
- The majority of members felt that there should be a transitional phase to implement the codes, as well as a target date, which may vary from member to member.
- One member thought that the acts of signing the terms of reference and of being members of the SSC should be sufficient, and no further 'signing' of the codes was needed. Another member stated that without a formal sign off of the codes, there would be no clear point of commitment to begin implementation.

Agreed:

Members will commit to the codes via an email to the secretariat by a specified date, followed by a public-facing external launch to occur at a later date.

Actions:

The secretariat will send the finalised sourcing and labelling codes and guidance document as soon as possible for sign-off.

Item 11: SSC launch strategy

The members discussed when and how the SSC would publicly launch the codes and guidance. The secretariat shared a draft press release that focused on the labelling code alone and proposed that the SSC members adopt a coordinated approach to the launch of the codes.

Discussion and comments:

- A member suggested that the end of July and all of August would be the best time to launch the codes, as there is a lull in the press at this time of year and the SSC launch may gain higher priority by the media.
- Members discussed the draft press release prepared by the secretariat and suggested that it should include member logos combined with quotes from members.
- A member suggested placing an embargo on the press release, because it will have a greater impact if it is released at the same time by all members.

- Members felt that the press release should focus on both the sourcing and labelling code as the labelling code is underpinned by the sourcing code, especially as the labelling code is less relevant for some foodservice members.
- Members suggested timing the public launch of the codes with a big seafood event.

Agreed:

- The secretariat will take the comments raised by members back to its communications team for further strategy development.
- Members will supply the secretariat with the contact details for members' own communication teams if they have not done so. Where they do not have specific press staff, the SSC representative will be the main contact.

Actions:

- The secretariat will consult with their communications team to alter the press release content and discuss the concerns raised by the members regarding the proposed launch strategy.
- The secretariat will liaise with the communication departments of the other members with the aim of coordinating an effective launch strategy.

Item 12: SSC logo use

Several feedback respondents were concerned that the logo would be mistaken for an ecolabel or felt it was unclear when and where the SSC logo will be used. The group discussed how and where the SSC logo should or should not be displayed. It has previously been agreed that the SSC logo cannot be used anywhere on pack.

Discussion and comments:

- Members felt that the logo should never be displayed on its own and that there should always be a qualifying statement (such as 'we are a member of the [logo]').
- The logo could be misleading if used in front of a product (such as the window of a fridge or freezer) and several members felt that the logo should not be used in store, or anywhere near a fish product.
- Regarding foodservice members, one member felt that the logo should be able to be used at the bottom of a menu with a statement of clarification such as 'a member of the SSC'. Another member disagreed and felt that this would still be misleading and that by the same logic a fish retailer may wish to display the logo by a fish counter.
- Members felt that although many would not use the logo in store/restaurant there should be a choice to use it because for smaller members where it may be a useful tool for communication. It would still be used with the qualifying statement in these cases.

Agreed:

Wording regarding how members may use the SSC logo, based on the examples presented, will be added to the terms of reference.

Actions:

The secretariat will add a section to the terms of reference regarding how the SSC logo may be used.

Item 13: Any other business

- The secretariat regrettably informed members that one founding member, Fish4Ever, has made the decision to leave the SSC.
- A member suggested setting up a working group to work on the governance of the SSC, helping members to adhere to the code.
- There will be a meeting on the 17 July to discuss Thai prawns regarding collective issues surrounding fishmeal (organised by Seafish).

Item 14: Presentation from Seafish about the RASS tool

Dr Alex Caveen from Sea Fish Industry Authority (Seafish) updated the group on the Risk Assessment for Sourcing Seafood (RASS) tool. The tool is in its final stages of development and for each species, will offer a risk rating for four different areas of a fishery: stock status; stock management; by-catch impacts; and habitat and ecosystem impacts. This tool aims to help individuals or businesses make more informed decisions on risk levels of the fishery. At launch, anticipated for September 2014, approximately 200 entries will be in the database; one entry is a single species per fishery per gear.

The RASS tool has previously been identified as being useful to SSC members. Questions from the group included:

- Is RASS being tied in with Seafish's Responsible Fishing Scheme (RFS)?
- Who peer reviewed the tool and the mechanisms to create the risk rating?
- Can fish aggregation device (FAD) profiles be included?
- Is it free to access?
- Can users request additional species?
- Will it include every species sold in the UK?
- Are the gear terminologies consistent with the new Common Organisation of the Markets (CMO) regulations?