

<b>Notes on the Responsible Fishing Ports and Harbours Scheme (RFPHS)- Technical Committee Meeting at Friend's House, London</b>	
<b>Date:</b>	19 <sup>th</sup> July 2016
<b>Attendees:</b>	Jonathan Shepherd (Seafish Board)- Chair Mike Platt (RS Standards) - Consultant Marcus Jacklin (Seafish) - Programme Manager Pete Wilson (Seafish) Hannah Fawcett (Seafish) Nick Kightley (Ethical Trading Initiative) John Forman (Peterhead HM) Leah Buckley (MSC) Riyaz Dhalla (Waitrose) Matt Bailey (Brixham Trawler Agents) Dave Bartlett (Brixham HM) Bill MacKenzie (Don Fishing (Scotland)) Pete Bromley (Sutton Harbour)
<b>Apologies:</b>	Rob Parsons (Newlyn Fish Market) Laky Zervudachi (Direct Seafoods) Jess Sparks (Seafish) Mike Berthet GAA (M&J Seafoods) Martyn Boyers (Grimsby Port/ Chair of British Ports Association Fishing Ports Group BPAFPG) Dave John McRobbie (Don Fishing - Scotland)) Steve Norton (Grimsby Fish Merchants Association) Andy Hickman Hannah Macintyre Katie Miller

### **Key discussion points**

#### **1. Welcome and outline of the agenda and mission for the day.**

The purpose of the meeting was to gauge feedback from members of the technical committee (TC) on the format and overall structure of the Code of Practice (CoP) for the RFPHS. It was emphasised that the content within the CoP would not be examined in detail. Feedback on the detail of the CoP was to be provided through the use of an online tool, see section 2.

The meeting was split into two main parts; the first discussed the overall format and presentation of the CoP, the second reviewed the template and headings of each module for a more comprehensive discussion. The meeting closed with a discussion of the next steps of feedback, review and any challenges.

## **2. Online platform for provision of feedback**

The CoP had been placed on an internet based platform to allow remote feedback on content and detail. The platform was demonstrated to the committee and, following discussions concerning early issues of some members' inability to access to the platform, MP agreed to issue guidelines (a Word document) to all members.

Following concerns expressed over how long it might take members to provide feedback through the platform, it was explained that the platform allows TC members to save progress as they work through the document; therefore 3-4 week period was provided to receive all feedback by 12<sup>th</sup> August.

Only members with permission would be able to see the document; however, members would be able to see comments from others and consensus opinions. Seafish maintains intellectual property rights to the document. The TC members agreed that the platform would do away with the need for numerous meetings.

Seafish and MP will pull comments at the end of the 3-4 week window and will amend the document accordingly.

## **3. Framework of the RFPHS CoP:**

### **3.1 Format (single or separate documents for each module)**

Consensus was for a single document. It was explained that skippers involved with the Responsible Fishing Scheme (RFS) had fed-back that having different guides was confusing and they would have preferred a single document.

### **3.2 Writing style (tone)**

The consensus was that the tone is adequate.

### **3.3 Content (level of detail)**

The consensus was that the level of detail is sufficient. Comparison was made with the BRC scheme - it was agreed that information should be available if/when a port required more detail.

Several queries concerned the interpretation of the guidelines in the context of ensuring that auditing would be consistent. The Group were reminded that the standard for the RFPHS will be developed after the CoP has been completed and that the CoP will act as a compliance support guide for potential applicants. It was confirmed that EHOs will be consulted as part of this development process to ensure that the CoP, as a minimum, meets the current legal requirements. Discussions also identified the need to develop more detailed best practice guidelines should specific areas with the CoP lack the necessary detail.

Discussions emphasised that the CoP must be user friendly, and it was agreed that the scheme is at the stage now where it can be made that way.

### **3.4 Omissions/inclusions**

Discussed per module, see below.

#### **3.4.1 Module One**

Much discussion surrounding the inclusion of HACCP in the CoP. Clarification was given that the RFPHS (the standard) may not require a registered (non-approved) port to have a full HACCP plan in place, whereas an approved facility would need to have one. However, as all ports are providing a food handling facility, it was suggested that the CoP/ standard should require non-approved ports to have in place a formalised version of a HACCP type plan.

It was emphasised that the intention of the module was to encourage ports to adopt and implement the principles of the HACCP way of thinking, which would reassure the supply chain that ports were operating to recognised operating procedures. The inclusion of a HACCP template caused some concern as it was thought that some applicants might simply copy the template whereas, in reality, an appropriate HACCP plan would need to be specific to the port in question.

In developing a food safety management plan, there was discussion over areas of responsibility (agents and/or ports) and whether ports would be required to implement all 7 steps of the HACCP. It was agreed that this topic required further consideration.

Members confirmed their understanding of the port category table (p.6), advising that this approach should be adopted in each module of the COP. The TC members were requested to check that they agreed with the requirements needed by each category of port and provide feedback via the online platform.

There was discussion surrounding how to achieve cooperation between ports, agents and buyers to achieve compliance with the RFPHS. Also discussed was the responsibility ports have over agents and buyers when on the port, and the need to avoid making the CoP too onerous to ensure easier enforcement.

There was discussion about the need for an additional section covering fish arriving over land within containers in particular.

It was noted that the MMO requires fish to be landed “at a designated port.” Following discussions as to whether the word “harbour” should be removed from the standard, it was agreed that the standard should apply only to establishments on the official list of designated fishing ports. The list had been formulated to prevent illegal landings; therefore legal designation provides for a “responsible” port. This notion is to be added to the online platform for further comment, along with the suggestion that the word “harbour” is removed from the programme.

*Section 1.2* Concern was expressed that this section was too restrictive/onerous and should made be open to interpretation to provide flexibility.

*Section 1.5* “notifiable diseases” should be re-worded to “infectious” or “salmonella”.  
Bin/box design e.g. drainage appears to be missing, should be covered under “equipment.”

*Section 1.7*- the proposal that waste should be kept more than 10m away from fishery products caused concern, and it was suggested that the stipulation should be that waste should be stored in leak-proof containers. Following discussion on the frequency of how often bins should be emptied, there was consensus that the regularity of bin collections depends whether the area is refrigerated, with agreement on a frequency of a maximum of every five days. Concern was expressed over a port’s responsibility for and enforcement of agents operating on port property in context of them complying with waste rules set out by the standard.

*Section 1.8* - The TC were reluctant to remove anything from this section. Members highlighted difficulties associated with a port’s ability to restrict public access during fish landings.

### **3.4.2. Module Two (Port and the Working Environment (Safety))**

The TC agreed to retain the EU section (legal landing obligations), as the current requirements are likely to remain for several years before possible changes due to UK leaving the EU. The TC highlighted the need to provide a list of “permits” that each port will need to sign to state that they are operating to the legal minimum requirements.

*Section 2.4*- TC agreed that the welfare of port employees and operatives is becoming increasingly important, and members advised that the seafood industry is coming under a lot of scrutiny for welfare.

Regulations detailed in this section have changed and require updating. Following discussions on whether naming legislation should be removed from the body of the CoP, some members disagreed arguing that it provides useful background information. An alternative suggestion was that the legislation name etc. could be added as a foot-note or in bold font for legal terms.

Discussions that good practice should include formalised management group (ports and fish selling agents).

Following discussions on the ‘unit of certification’, it was agreed that the unit should comprise port authorities and selling agents; however, there was a need to clarify who might be exempt from this arrangement, specifically if processors operate within the port. For example, processors using storage or waste facilities operated by the port would need to comply, whereas processors using their own facilities would be exempt. There was consensus from port members that the RFPHS standard would be workable if a ‘concessions section’ for these port processors could be added to this effect.

It was agreed that a glossary to the appendix of this module (and others).

### **3.4.3. Module Three (Care of The environment)**

Discussion focussed mostly on the inclusion of requirements relating to greenhouse gas emissions. Some members expressed concern, advising that ports constantly investigate options to reduce overheads and that any detailed requirements would put too much pressure on smaller ports and should be excluded. It was suggested that the government requires businesses of a certain size to submit greenhouse gas data; however, this requires confirmation.

D. Bartlett agreed to write, on the online platform, suitable wording for ports in the context of greenhouse gas emissions. It was agreed that this would provide good background information to support the ports but should not form part of the audit process.

### **3.4.4. Module Four (Care of the catch)**

The TC agreed that consideration of frozen fish should be outside the scope of the CoP. Following discussions surrounding a grading benchmark, it was suggested that an auditor assessing an applicant's compliance could check that grading was being undertaken according to a port's own standards; as such, the port grading practices must be fully documented and available for review/inspection.

### **3.4.5. Module Five (Traceability)**

The acknowledged omission of animal by-products was highlighted. P Wilson agreed to discuss with a colleague who specialises in the matter. In order to include devolved nations in the scheme, PW is to gauge a Scottish perspective; and the need to secure perspective from Wales and NI was highlighted.

## **4 . Closing Comments**

- Feedback on the online platform to be completed by the 12th August.
- Amendments made to the CoP, in light of the above feedback, to be made by the end of August.
- Draft 2 of CoP to reviewed by TC by mid-October (via 'Knowfish' website)
- CoP to go to the Oversight Board for their review and feedback (October/November).
- Construction of the standard to commence during September.
- It was agreed that the TC would not need to meet again until after the draft CoP is finished.