



PAS 1550:2017

Exercising due diligence in establishing the legal origin of seafood products and marine ingredients.

PAS Overview & Implementation Guide

Presentation to SEA Alliance

11th February 2021

This is a preview. To view the full content, please purchase this document.

PAS 1550:2017

Exercising due diligence in establishing the legal
origin of seafood products and marine ingredients –
Importing and processing –
Code of practice



Agenda

- **Background and development of the PAS Code of Practice**
- **Summary of PAS survey results**
- **Baseline fundamentals upon which PAS is built**
- **What has happened since 2018/ 2019 feedback**
- **Implementation guidance notes**
- **Deeper dive flow diagrams**
- **Operationalising PAS**
- **NGO coalition Next Steps**
- **Q and A**



Background

- Developed with industry by WWF, EJF, Pew and Oceana (EU IUU Coalition)
- Builds on previous retailers IUU Advisory Note
 - Adds: **working conditions** and **traceability**
- Primary audience is importers and processors
- Status: **publicly available standard (PAS)**
 - “pre-standard”
 - managed by British Standards Institute (bsi)



Produced by consensus with Steering Group

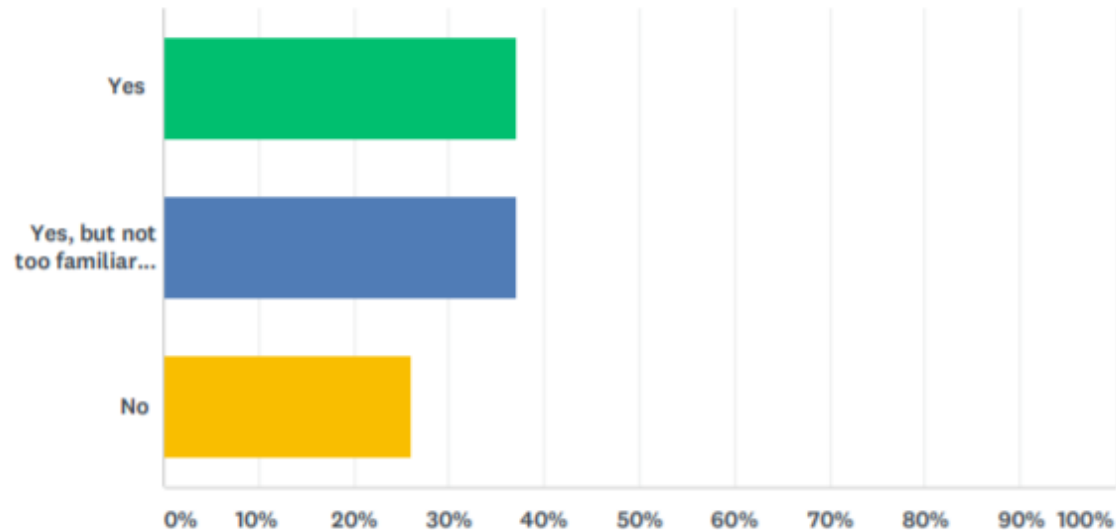
- British Retail Consortium (BRC)
- ClientEarth
- Environmental Justice Foundation (EJF)
- FishWise
- Food and Drink Federation (FDF)
- Human Rights at Sea (HRAS)
- Lovering Foods Ltd.
- Marine Management Organisation (MMO)
- MRAG Ltd.
- Morrisons
- Oceana
- The Pew Charitable Trusts (Pew)
- Seafish
- UK Seafood Industry Alliance
- Tesco Stores Limited
- WWF

Input also from wider review panel during open consultation

PAS Survey Results (Oct 2018)

Q4 Have you heard of the PAS 1550:2017 Code of Practice?

Answered: 27 Skipped: 1



Q9 Which aspects of the PAS 1550:2017 have been implemented?

ANSWER CHOICES	RESPONSES	
Aspects of Management- Policies and processes	66.67%	6
Aspects of Management- Traceability	100.00%	9
Aspects of Management- Information verification and transparency	66.67%	6
Aspects of fisheries and fishing operations- Management of fisheries	22.22%	2
Aspects of fisheries and fishing operations- Fisheries access control	22.22%	2
Aspects of fisheries and fishing operations- Monitoring, control and surveillance	11.11%	1
Aspects of fisheries and fishing operations- Source fishing vessels	22.22%	2
Aspects of fisheries and fishing operations- Transshipment	22.22%	2
Aspects of fisheries and fishing operations- Landing at port	11.11%	1
Aspects of fisheries and fishing operations- Decent working conditions in the fishing sector	44.44%	4
Aspects of factory management- Information (compiled, stored and reviewed)	66.67%	6
Aspects of factory management- Process control	77.78%	7
Aspects of factory management- Ethics and labour	100.00%	9
Aspects of factory management- Product tracking and transformation	66.67%	6
Total Respondents: 9		

Q12 What have been the main challenges? (please tick all that apply).

ANSWER CHOICES	RESPONSES	
Unsure how to access the PAS 1550:2017 document	15.38%	2
Difficulty understanding the PAS 1550:2017	7.69%	1
Unsure how to implement the PAS 1550 within your operations	23.08%	3
Lack of cooperation from suppliers	38.46%	5
Lack of support from management staff (internal or external)	23.08%	3
Lack of resource- financial	7.69%	1
Lack of resource- time	53.85%	7
Lack of resource- expertise	30.77%	4
Lack of transparency in operations	30.77%	4
Other (please specify)	23.08%	3
Total Respondents: 13		

Four Fundamentals of PAS

Market controls

Data

Traceability

Verification

Market controls

Analysis of supply chains

Vessels should not be flagged to or licensed to fish by red-carded states

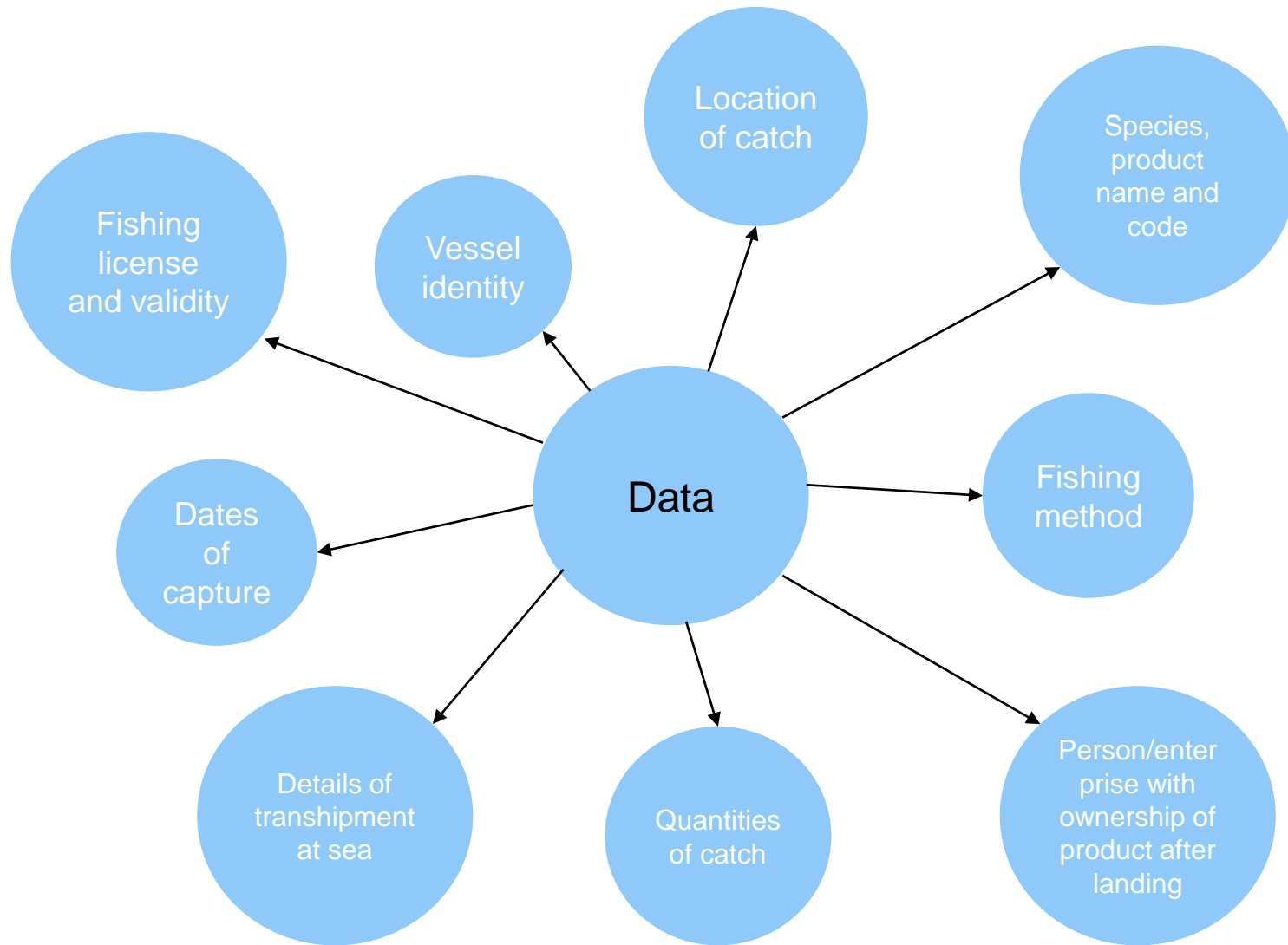
Purchases should not be made by a flag country that has not notified the EU of its competent authorities

Full chain traceability and audits at a minimum of once every 12 months should be applied for yellow-carded

EU IUU and other catch certificates provide transshipment information

Port(s) where purchased seafood is landed is party to/implements FAO's Port State Measures Agreement

Measures to check:
Port designation, dockside inspections, denial of entry, information sharing



To ensure a strong traceability system:

- ✓ Data must be verified
- ✓ Data must be subject to external verification/independent audits
- ✓ Data should go all the way to the vessel
- ✓ Carry out random trace-back exercises
- ✓ Match sales transactions e.g. by using batch numbers on invoices
- ✓ Ensure information is available on request
- ✓ Product information maintained on an electronic system

In addition, the following items are not required as part of the EU catch certificate but can be collected as good practice:

1. Identity of vessel owner/operator
2. Fishing authorisation/permit
3. Catch composition data (i.e. non-target species, discards)
4. Habitat impacts
5. Monitoring on board the vessel (e.g. observers, CCTV)
6. Transformation of fish prior to landing

NB: revisions of the EU catch certificate is underway considering the inclusion of catch date and fishing gear – may be adopted late 2021

Tools which aid traceability and transparency:

Monitoring,
Control and
surveillance
(VMS, AIS)

Logbooks

At sea
inspections

Observers,
REM

Purchasing
standards

Third party
certification

Port state
controls

DNA testing

What has been happening?

- Guidance notes for PAS developed
- Industry feedback
- RFVS & GDST “benchmarking” completed, OPAGAC APR in hand
- Implementation guide, flow diagrams, useful resources for use in risk assessment developed
- Industry feedback

Implementation Guide

Split into 3 levels of practice

- **Base level** (targeting those just starting)
 - Develop policy, communicate it, begin thinking about implementing
- **Implementing or PAS compliant** (those on the journey)
 - Implementing - Policy acknowledged by suppliers, data collection started, risk assessment processing developed or being developed
 - Compliant – risk assessment ongoing, supply chains being categorised and improvements ongoing or being developed, advocacy commonplace
- **Aspirational** (nearing the end and managing exception)
 - Transparent supply chain of low-risk sources, with improvements and advocacy demonstrated and KDEs communicated digitally

Implementation Guide Example

3.1 General		Base practice	Implementation of PAS/ PAS Compliant	Aspirational practice
3.1.1	Does the organization have systems in place to manage critical aspects of legality? <i>These should comply with requirements such as the EU IUU Regulation, relevant policy, standards and labour conventions. These systems should include traceability, processes, information verification and transparency.</i>	A company sourcing policy explicitly stating its' desire to avoid buying IUU fish which also makes reference to the Modern Slavery Act (if UK based) or other relevant statutory due diligence requirements is written and available. The policy includes the desire to engage with the supply chain to transition/ improve supply chains that once risk assessed identify the for need improvement. The policy has been communicated to all suppliers and basic procedures to check product, supply chain (incl EU IUU Regulation Catch certs), vessels, and suppliers are legal as far as it is practical to check	A management system is in place that includes processes to manage information verification and traceability. Where practical a 3rd party audit of management system (e.g. BRC, IFS or GSA) processing standard to ensure traceability are in place. The company is a member of GDST and is working with suppliers to capture the relevant KDE's.	Full supply chain transparency is achieved with public reporting of policy, practices, supply chains. Full supply chain reporting traceability using the GDST data requirements
3.1.2	Do the managers of the organization engage on improvement work with other suppliers or actors in the supply chain (e.g. audits, reviews, site visits, etc.)?	A list containing all products and (stock keeping units / SKUs) is available within the business which details basic information of source fishery and supply chain. Sufficient information to being collected to warrant that the seafood being purchased is legally caught and that when being sold is being labelled accurately. All suppliers have received copies of the company policies and internally risk assessment process are either being considered, in the process of being developed or an existing mechanism adopted so that where needed supply chain improvements can be identified	The company seafood sourcing policy is formally acknowledged by all suppliers. The list of products and suppliers has been risk assessed and categorised into high, medium or low risk according to the company policy, with high risk products and high risk suppliers having either written and agreed improvement plans or are working to have agreed plans within an agreed timeframe. Audits of high risk supply chains are taking place ideally using third parties or are being arranged	All SKUs have been risk assessed, all high risk products have been mitigated so that the majority of sources are low or medium risk . All suppliers are working to achieve sustained low risk categorisation with routine risk assessment and monitoring systems established to maintain this.

Implementation Guide Example

3.1 General	Base practice	Implementation of PAS/ PAS Compliant	Aspirational practice
3.3.2 Due diligence through risk assessments			
<p>3.3.2.1 Does the organization conduct risk assessments on all of the supply chains from which it sources and be able to demonstrate that it does so?</p> <p><i>The level of risk in supply chains can be reduced by identifying and taking mitigation actions or measures. Attention is drawn to the BRC Advisory Note for the UK Supply Chain on How to Avoid IUU Fishery</i></p>	<p>The need for supply chains to be mapped back to vessel or group of vessels so that the IUU risk of individual supply sources can be identified and then risk assessed has been communicated to suppliers. This communication should include a timeframe within which this task should be completed. Using the BRC advisory note the company has begun to determine what risks it finds acceptable within supply chains and is formulating a risk assessment matrix with which to assess the information that is being collected of its supply chains</p>	<p>All seafood supply chains have been mapped, risk assessments have been completed for all with risk categorisations made and in the case of high risk sources; improvement plans agreed. Consideration to volume of seafood purchased from an individual source, confidence in regulation and of the supply chain will inform the metrics of the risk assessment as well as mitigation and improvements steps that can be taken</p>	<p>All seafood supply chains have been risk assessed on numerous occasions, all previously assessed high risk sources have either been mitigated or are no longer supplying, leaving minimal medium risk and the majority of sources being considered low risk</p>

Flow Diagram Example

PAS:1550 - VMS AIS Flow Diagram v2

Don't know answer: If you don't know the answer to a question, you should launch a formal investigation or seek expert help to answer it.

LEGEND

Risk assessment consideration

Required

Aligns with GDST

Condition satisfied. Proceed

Condition not satisfied. Action required

Proceed in line with risk assessment

4.4.3.g Does the flag state have VMS & AIS requirements in its licensing and fishing

HOLDER: BASE PRACTICE

Yes

No

Advocate for their use within your supply chain.

HOLDER: BASE PRACTICE

Are all vessels required to use VMS/ AIS doing

HOLDER: BASE PRACTICE

Yes

No

Advocate for their use within your supply chain.

HOLDER: BASE PRACTICE

Are data network identity (DNID) numbers mandated to groups of vessels?

HOLDER: Rest are COMPLIANT PRACTICE.

Yes

No

See blue box.

3.4.10, 4.4.3.a & b Do you know the unique identifiers for each vessel in your supply

Yes

No

Find out what they are.

Is the VMS data centralised with data routinely shared with coastal and or port states?

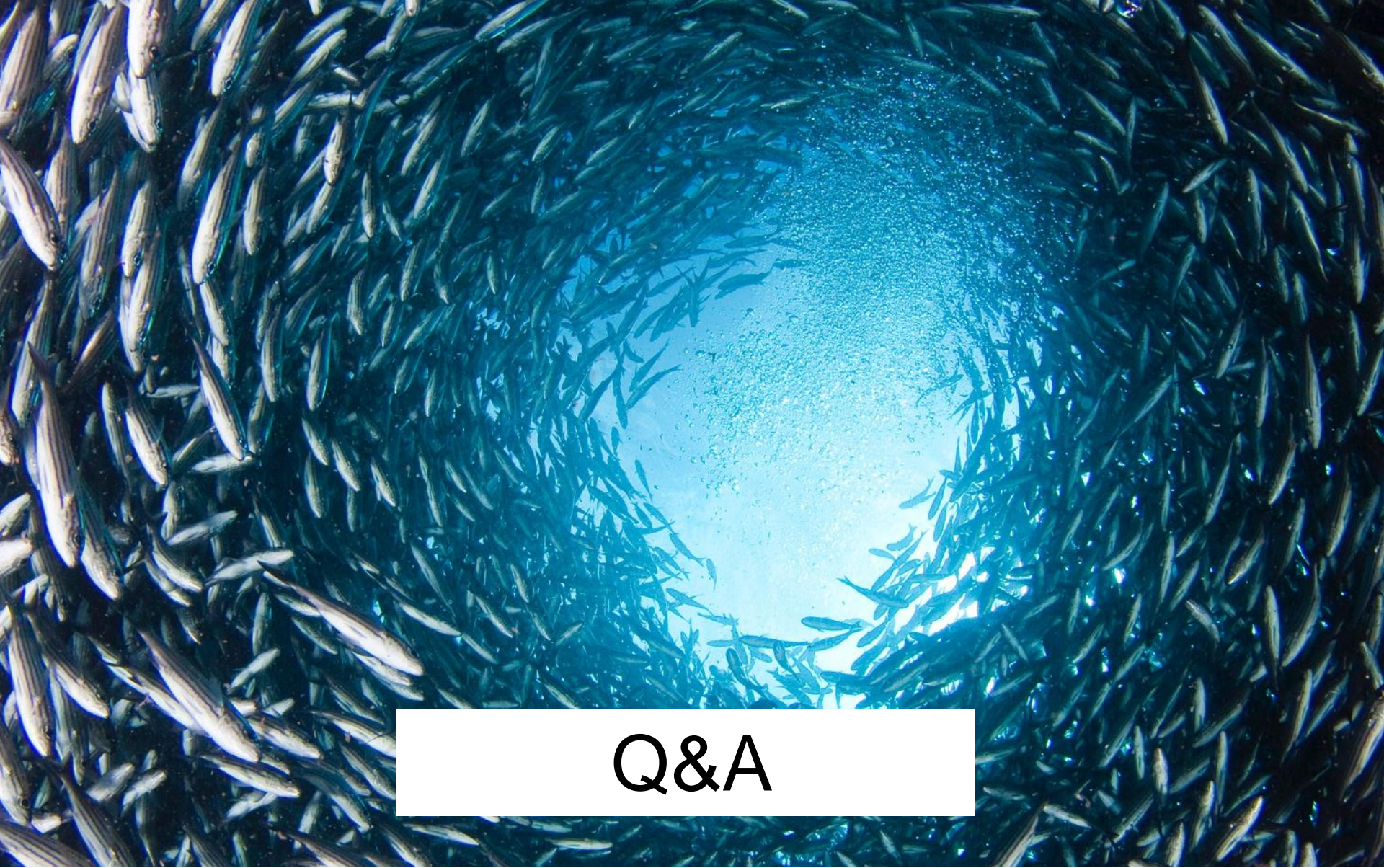
At each stage when an element of policy is either not mandated for, or is insufficiently implemented for it to have any positive impact to reduce IUU consider you, and/or your supply chain advocating for this to happen.

How can:

- a. *PAS 1550 be operationalised?*
- b. *mandated to be used within supply chains?*
- c. *the PAS make risk assessments routine?*

NGO coalition next steps

- Make PAS1550 free to download
- Agree with SEA Alliance implementation guide
- Translate PAS and guide into Spanish, German and possibly French
- Explore updating PAS into a global code incorporating SIMP and Japanese regs



Q&A