

SEAFOOD ETHICS ACTION ALLIANCE (SEA Alliance)

Notes on Seafood Ethics Action Alliance (SEA Alliance) meeting. Wednesday 3 July 2019. London.

In attendance:

Adam Townley	New England Seafoods
Aisha Aswani	Co-op
Alastair Maxwell	Sea Dragon Ltd
Amali Bunter	Lidl
Amber Madley	Lovering Foods Ltd
Andy Smith	Iceland
Aoife Martin	Seafish
Cameron Moffatt	Young's Seafoods
Cassie Leisk	New England Seafood
Clare Clifton	World Wise Foods
Clarus Chu	World Wildlife Fund
Dionne Harrison	Sainsbury's
Estelle Brennan	Lyons Seafoods
Ignacio Del Castillo	Sedex
Joe Prosho	Morrisons
Karen Green	Seafish
Kevin Powell	Seachill
Laky Zervudachi	Direct Seafoods
Lara Funk	Seafish
Leah Riley-Brown	British Retail Consortium
Leonor Fishman	LDH (La Doria) Ltd
Louise McCafferty	Joseph Robertson
Malcolm Harris	Sea Dragon Ltd
Max Schmid	Environmental Justice Foundation
Mick Bacon	Seafish
Mike Mitchell	Fair Seas
Mike Short	Seafood Industry Alliance
Nick Kightley	Ethical Trading Initiative
Sam Ludlow-Taylor	Waitrose
Soraya Candimba	Sedex

1. Introduction

1.1. Competition statement

Reminder – meeting held under mandate of competition statement - previously shown.

We must at all times comply with the requirements of competition law throughout this meeting, including in any informal discussions. Accordingly, we must not engage in any conduct which is likely to have the effect of preventing, distorting or restricting competition. All participants at this meeting agree to adhere to these principles and acknowledge that failure to do so could have serious consequences in law. Please also respect the confidentiality of your relationships with both customers and suppliers. These ground rules should serve to protect us all from any inadvertent breach of competition law.

1.2. Participation in the Alliance

There is continuing interest in the SEA Alliance. A list of organisations engaged with the SEA Alliance was shown, as well as the current Steering Group which includes:

1.3. Steering Group membership

Amber Madley	Lovering Foods
Andy Hickman	Tesco
Estelle Brennan	Lyons Seafoods

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Joe Prosho	Morrisons
Karen Green	Seafish (secretariat)
Kevin Powell	Seachill
Leah Riley-Brown	British Retail Consortium
Lucy Blow/Melissa Pritchard	New England Seafood
Mike Mitchell	Fair Seas
Mike Short	Seafood Industry Alliance
Sam Ludlow-Taylor	Waitrose

1.4. SEA Alliance web page

<https://www.seafish.org/article/seafood-ethics-action-alliance>

2. SEA Alliance working group on the PAS 1550:2017 Code of Practice – a joint working group with EJF and WWF proposal for discussion. WWF and EJF were in attendance for this discussion.

The PAS is a tool to develop a due diligence system in order to minimize risk of supplying seafood tainted with IUU or a lack of decent working conditions. A proposal for a joint NGO/SEA Alliance PAS Working Group was tabled to develop the 'how'. It is acknowledged that how the PAS is implemented will take different forms but there was little practical guidance in the PAS itself on how the PAS could be implemented within a business. To help companies understand in a practical way how the PAS can apply to their systems a working group was proposed and volunteers from the SEA Alliance met on 29 April to explore the options. As a result of this EJF and WWF have produced a proposal to frame this. There is still the need for further discussion but in principle we have agreed:

- To create a working group. This will be a coalition of SEA Alliance members (a sub-group of retailers and suppliers) and NGOs who will work together to develop a guidance note to support the PAS.
- This guidance note will provide practical suggestions for implementing the PAS and help different segments of the supply chain understand their respective roles. This will be a separate document which supplements and supports the PAS and therefore will not fall under BSI ownership.

Actions arising - next steps:

- The first step is to formalise the working group, give it a name and develop a clear ToR for the group.
- Further discussion will then follow on the detailed scope of the work and how this will be undertaken; the potential funding required (and if this could all be covered by WWF and EJF); the likely commitment to do this; and the potential capacity (e.g. time) required to complete the tasks.
- WWF and EJF have indicated they could take the lead co-ordinating role in bringing this together.
- This coalition will inform the review of the PAS (e.g. updating, inclusion of new / exclusion of outdated elements); and also recommend whether or not the Code of Practice can be made freely available.
- The group has a tele-conference planned for Wednesday 17 July 2019.

3. EJF 10 Global Transparency Principles.

The Seafood Industry Alliance has agreed the following set of words in support of the PAS and the EJF 10 Principles:

The Seafood Industry Alliance (SIA) recognises the need for effective tools to identify, avoid or mitigate the risks of IUU fishing, and to help protect fishing crews and factory workers from human rights abuses. We collaborated as an industry partner in the development of PAS 1550 and will support its future development as a code of good practice. We commit to using it as an optimal

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framework for our advocacy, and where appropriate as a guiding principle for our risk management and due diligence.

The SIA also supports the EIJ ten principles for global transparency in the fishing industry, and we are committed to working as an alliance, and with our respective supply partners to ensure that our seafood is sourced only from legal and ethical sources.

Actions arising:

- The SEA Alliance to look at how to add to this.

4. Draft FAO guidance on social responsibility in fisheries and aquaculture value chains. Comments by 28 July 2019. Should the SEA Alliance respond to this consultation?

There was some discussion on this.

- This guidance needs to be practical and useful and not something that just sits on a shelf. The ETI in particular is particularly keen for companies to provide feedback.
- This is a great opportunity to demonstrate globally the expectations of the global seafood industry. The SEA Alliance could be used to highlight best practice and provide more international credibility to this kind of process. It does make sense to have a recognised framework of global best practice.
- Whilst the idea is good it is not practically orientated and looks like it has been created from scratch with little acknowledgement of what is already out there.
- We can't overstate the need for a commitment to ethical risk assessment. Environmental due diligence has been addressed through the Sustainable Seafood Coalition and the PAS could help with the ethical aspects. We need to decide what the SEA Alliance can deliver as a group. We can't yet demonstrate leadership on exercising due diligence on ethics.
- We need to think about who is leading the way on this but also be mindful about who is asking for what.
- The Code of Conduct for Responsible Fisheries is pivotal. Do we think that this FAO document will play the same role? Will it do what the Code has done? Has it come a few years too late or are we just further ahead in this arena? Once this is in place it will have universal applicability.

Next steps

- There was some discussion around methods to share comments and whether we should respond as a single voice.
- The distinction was made that the SEA Alliance is not a membership organisation and that membership organisations can and should respond.
- This is a relatively short deadline (28 July) and it is a complicated process to come up with a response that all participants in the SEA Alliance are happy with.

It was agreed and actions arising:

- The SEA Alliance would not make an Alliance response but would encourage companies/businesses to make individual responses.
- Seafish would precis the guidance and include reference in the next SECLG newsletter and in the follow up notes after this meeting.

5. Fishing Vessel Labour Practices Data Collection: A collaborative pilot project between the Seafood Ethics Action Alliance (SEA Alliance) and Sedex. This is progressing and Sedex will report on progress. Soraya Candimba and Ignacio Del Castillo from Sedex were in attendance.

As reported by Andy Hickman (not in attendance) the Fishing Vessel Labour and Welfare Practices data collection portal is nearing completion – there are a few small changes to make. The SEA Alliance is keen to establish a plan to analyse the data collected to identify risks and opportunities, bring value to participants in the project, and most importantly improve standards for workers. Sedex have indicated that they cannot provide a deep dive of the data so it is envisaged that this

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may require contracting a specialist to review the data and provide a report that can inform next steps (but there may be budget required to support this). If this is agreed we will need to create a Terms of Reference for a consultant to review the data and create a report. Tesco may also engage directly with suppliers to collect this data in an unanonymised format for certain supply chains.

Sedex did report on their Fisheries Module Sedex Advance for A & A/B Members at a cost of £100 per site (per vessel), per year for active membership before explaining the Inclusive Fisheries Module and its landing page, webform (Survey Monkey) and reporting. The aim is for a pilot for a month to check level of engagement. It was a little unclear about the SEA Alliance/Sedex e-mail template to be sent out to vessels and the SEA Alliance/Sedex initial list of vessels and how this dovetailed with what had been produced before.

Discussion

- **Q.** There was mention of 'no identifiable data – either vessel name, company name or owner name'. If this is not captured how can we address any issues? There needs to be a means to address serious concerns. **A.** This addresses concerns over anonymity. Sedex will have this data.
- The vessel owners will input data. **A.** Can intermediaries also input data? With artisanal vessels there can be a constant changing of crew. **A.** How often should this data be updated? **A.** The person best placed to do so should fill in the data.
- **Q.** Is there a box to fill in within the questionnaire to allow an indication of who is filling in the data i.e. skipper, vessel owner, agent/intermediary? **A.** We need to look into this.
- Small artisanal fleets are challenging. Here traditional due diligence does not work at vessel level. And a more creative conversation is needed to address this.

It was agreed and actions arising:

- To run this pilot (Survey Monkey) to learn more.

6. Seafish project: Social Risk Assessment Information.

This reference document has been assembled to help seafood businesses better understand the metrics and scoring methodologies of different open and closed sources of information.

It looks at national and supranational government agencies, NGOs, private sector research and consulting houses etc.) that offer insight on the environmental, social and governance (ESG) risks posed to UK businesses by seafood trading partners in third countries.

Actions arising:

- Seafish will be seeking feedback from the SEA Alliance on this document.

7. The SEA Alliance priorities/next steps.

It had been the intention to run a roundtable discussion around this but we ran out of time.

Questions would have been.

- What are our priority areas?
- How can the SEA Alliance really add value? How do we become more accountable?
- How can we become more task/action orientated?
- How can we work more effectively collectively as a group to drive change?
- Are working groups the way forward?

Actions arising:

- A Survey Monkey was suggested as a way to take this forward.