

Note of Aquaculture Common Issues Group meeting held at Fishmongers' Hall, London. Wednesday 9 April 2014

For minutes and further information see:

<http://www.seafish.org/industry-support/aquaculture/aquaculture-groups/aquaculture-common-issues-group>

<http://www.seafish.org/industry-support/aquaculture/aquaculture-support/guides-and-information>

Attendees

Alex Keay	Centre for Sustainable Aquatic Research, Swansea University
Anton Immink	Sustainable Fisheries Partnership
Carly Daniels	National Lobster Hatchery
Chris Ninnes	ASC
Clare Blackledge	Environment Agency
Craig Burton	Seafood Scotland
Daniel Lee	GAA
David Bassett	British Trout Association
David Jarrad	SAGB
David Mortimer	FSA
Dennis Blackmore	University of Stirling
Elaine Hayes	Seafish Board
Emi Kato	MRAG
Francis Murray	University of Stirling
Holly Drage	Aldi
Ian Pike	Consultant
James Turner	Defra
Jamie Smith	SSPO
Jane Ryder	Seafish Board
Jill Wilson	FSA
John Holmyard	Offshore Shellfish Ltd
Jonathan Shepherd	Consultant
Jose Constantino	Welsh Government
Jim Masters	MCS
Karen Green	Seafish (Minutes)
Kate Hedges	Defra
Katie Miller	ClientEarth
Liane Veitch	ClientEarth
Libby Woodhatch	Seafish
Mandy Pyke	Seafish
Marcus Jacklin	Seafish
Melissa Pritchard	New England Seafood
Peter Tarrant	Maritek Worldwide Ltd

Richard Aram	FAWC
Rob Farr	New England Seafood
Robert Floyd	Welsh Government
Suzanne Clift	ASC
Suzanne Hamilton	Frontline
Tom Pickerell	Seafish (Chair)

1. Welcome and apologies

Tom Pickerell welcomed everyone to the Aquaculture Common Issues Group meeting. Apologies were received from:

Andy Hughes	BAQUA
Chris Leftwich	Fishmongers' Company
Estelle Brennan	Lyons Seafoods
Hannah MacIntyre	M&S
Huw Thomas	Morrisons
Janet Brown	The Grower
John Goodlad	Seafish panel
Keith Jeffery	Cefas
Martin Jaffa	Callander McDowell
Martin Syvret	Aquafish Solutions Ltd
Matt Elliott	MMO
Neil Auchterlonie	Cefas
Niall MacDonald	EWOS Ltd
Nick Bradbury	BioMar
Nick Lake	ASSG
Nigel Edwards	Seachill
Patrick Blow	M&S
Richard Slaski	SARF
Simon Derrick	Seachill
Simon Kershaw	Cefas
Stephen Cameron	Scottish Shellfish Marketing Group
Steve Bracken	Marine Harvest
Toby Parker	UFI
Tracey Heyworth	Birds Eye
Valeska Weymann	GlobalG.A.P.
Walter Speirs	ASSG

2. Minutes from previous meeting held on 12 September 2013.

The minutes from the previous meeting were agreed. Matters arising:

2.1 SFP's approach to aquaculture improvement projects (AIPs) and Aquaculture Profiles on FishSource. Next developments to be communicated to the group. Anton Immink reported that SFP are still developing the Fish Source profiles. Two SE Asia Trawl Fisheries Fishery Improvement Projects are underway.

Action: Group to be kept up-to-date with developments.

2.2 MMO/Seafish project to collect economic information on UK aquaculture for 2012. Group to be kept informed of progress.

Action: This will be covered later in the agenda.

2.3 Industry position statement on greenhouse gas emissions. Comments to be taken into consideration and draft circulated round CLG.

This was discussed at the CLG meeting in July. The position statement is being revised and a guide to GHG emissions is in draft form.

Action: Group to be kept up-to-date with developments.

2.4 Shellfish Update. Action was to keep up-to-date with the latest developments and look further into issues surrounding humane killing and animal welfare concerns re live bivalve mollusc's at depuration centers.

There was further discussion that this had been raised by one retailer who wanted standards for the correct killing of molluscs. This is covered (in the small print) of the Farm Animal Welfare Committee (FAWC) opinion and Seafish has responded that there are guidelines in place to ensure that live bivalve molluscs are handled humanely.

Policy issues

3. Multiannual National Plan (MANP), James Turner, Defra.

http://www.seafish.org/media/1173549/acigapril2014_defra_mnap.pdf

James reported that there had been an informal consultation on the Multiannual National Plan for aquaculture and a formal six week consultation launched on 31 March to run until 12 May 2014. Four challenges have been identified for the UK to respond to: simplify administrative procedures; secure development through coordinated spatial planning; enhance the competitiveness of EU aquaculture; and exploit competitive advantages.

Discussion

- Q. Everything about the MANP is centred around EMFF. Has Defra considered how EMFF will be delivered? The current EFF system with the MMO is not working correctly. So if this is going to be administered in the same way it won't work. A. Defra is aware of this and it will be addressed. We are keen to make sure the necessary changes are made.
- The MMO is well aware of the concerns that have been voiced and is looking at the whole design and delivery of EMFF. Be re-assured that there will be changes. A lot of thought is being given to the way EMFF can be deployed in a different way to EFF. The issues are more about the bureaucracy rather than the concept.
- If this is under review then this is encouraging that the MMO is using this as an enabling exercise. In the past it has felt as if it was an exercise in finding ways not to allocate funds. A better knowledge base within the MMO of aquaculture issues would help.
- Q. If an organisation has already responded to the informal consultation do they now have to respond to the formal consultation? A. Those

comments will already have been taken onboard. However any additional comments should be sent on.

- Q. This does raise questions. Under FOI the responses to a formal consultation have to be publically available and published. Do comments sent in response to an informal consultation have to be treated in the same way? A. Defra will need to look into this. It was subsequently confirmed that even comments made informally will be available through FOI as they were sent by email, so there is no need to replicate responses.

Action: Flag up the consultation to the whole ACIG circulation list.

4. Data Collection Framework and EU Multi-Annual Programme – Economic data and indicators. Suzanne Hamilton, Frontline.

http://www.seafish.org/media/1173555/acigapril2014_frontline_2012economicdata.pdf

This builds on the 2013 pilot project presented at the September ACIG meeting. Suzanne explained that the objective of this exercise is to: gather data on the economic performance in 2012 as part of the UK's 2014 response to the EC DCF; to develop a UK wide database of all producers; to ensure sample size across country, fish type and DCF economic variables is sufficient; collect data at enterprise level; advise on the most appropriate methods for future economic data collection. DCF tables have to be completed by the end of May 2014.

Discussion

- Q. The fundamental problem with this is competition across the industry. Anonymity is very important – how do you stop this information being identifiable to particular companies? What guarantees are in place to ensure anonymity? A. Only aggregated information will be provided so no individual company results would be included. It would only be an issue if there was only one company representing a particular sector. I can only think of one instance where this would be the case - tilapia.
- Q. What about if the information was requested under a FOI request? A. Although Frontline collects the data we provide a completely anonymous analysis and we are a third party and there is data protection.
- In Jersey while there is a statutory requirement to provide statistics this has not happened because of commercial sensitivity. As a result a financial model has been built based on realistic costs. This means there are no confidentiality issues and could be considered as a way forward.
- Q. Annual returns show expenditure going forward but are based on costs that have already been incurred. This creates difficulties with figures that need to be balanced? A. This is being considered.
- With regards to modelling Seafish produced a series of hyperbooks a few years ago. These could be expanded, updated and improved.
- Frontline has tried a number of different models. We want to be able to scale up but need good data to start with. We have worked with Cefas but have not been able to get the same amount of data from Marine Scotland and DARD.

Action: Flag up the survey to the whole ACIG circulation list.

5. England Aquaculture Plan. Industry discussion led by John Holmyard and David Jarrad, SAGB.

The England Aquaculture Plan discussions were launched with a Defra-facilitated workshop in July 2010. This progressed to an Advisory and Development Group, which led to working groups formed to look at the different issues facing the industry. A consultation paper was produced and issued with the responses handled by Defra. A workshop was held in September 2012 to discuss the comments and develop a work plan. The Plan has been mentioned at various forums since the workshop however there has been very little activity since then. A lot of work has gone into this and there is frustration that Defra do not really understand the industry and the potential for aquaculture growth in England. The plan that was sent out for consultation deliberately included descriptions of potential targets. It is recognised that these were huge and not necessarily attainable. The issue here is that unlike Scotland, where Government does take the lead on aquaculture development, there is no lead in England and no reference point.

The second aspect is the aquaculture regulatory burden survey undertaken by Cefas. The survey was completed by Cefas but has never been published. It was completed over two years ago so there will be issues over the validity of certain parts of it. The industry regards itself as over-regulated and the fact that this report has not been published restricts the implementation of an English development plan; the regulatory background is fundamental and if this is seen to be onerous it will limit investment.

Discussion

- Q. Is limited investment widespread across the industry, or is it limited to specific sectors? A. There are different issues for different sectors. The regulatory situation does not help but there are other reasons for no investment in trout farms – as a whole the industry does not make much money.
- There were various action points that Defra took away from the workshop in September 2012 but with personnel changes at Defra this was all stalled pending the MANP. Now is the time for constructive discussion.
- There was a question as to whether the regulatory burden was disproportionately onerous on this sector, or whether there was additional burden on the marine environment as a whole ie MCZs, marine plans, CFP reform? There was some discussion on whether there is an unduly heavy burden on the aquaculture sector but now would be a good opportunity to look at the domestic regulatory burden as a whole.
- This regulatory burden exercise is more to do with allowing those who want to engage with the regulator to do so. There is no clear route for engagement, plus we need to see whether the regulations are fit for purpose.

- Q. Is the working group still there, and is there any movement on establishing any sort of plan? A. There has been no movement since the workshop.
- Q. Would it be timely for Seafish to bring the group back together again and build on the foundations from 18 months ago? A. There was a strong consensus from the group, particularly the English Aquaculture Plan group and Defra, that it would be very useful to start afresh.

Action: Seafish to reconvene the working group and bring the interested parties and Defra back together again to develop concrete actions to take forward. This would start with the steering group. Activities to be reported back at the next ACIG meeting.

6. Water quality and norovirus. Led by Mandy Pyke, Seafish.

http://www.seafish.org/media/1173631/acigapril2014_seafish_shellfishupdate.pdf

Mandy gave an update on classification changes; norovirus; EFSA and FSA; text alerts; algal toxin HACCP.

Less than 2% of English waters are classification A. An EU Food and Veterinary Office (FVO) inspection has shown that the UK has not been compliant with Cat 'B' criteria in some areas and 12 production areas will be downgraded to a 'C' category at the end of this month and others may follow in September.

It was stated that there would be no significant change in CSO discharges by investments from water companies before 2020. There are 3 million cases a year with 17% of people shedding virions at any one time. Specific cases attributable to shellfish are low.

DG Sanco is proposing to change legislation 'For bivalve molluscs destined to or intended to be eaten raw they should not exceed the viral limit of XXX NoV PCR genome copies...for the presence of enteric viruses as Norovirus, in production and relaying areas where live bivalve molluscs destined to or intended to be eaten raw are cultivated;...'. Levels are expected to be 1,000 gcg for harvesting and 200 gcg for EPT.

Discussion

- This 1,000 gcg is very significant for the industry. It has been forecast (Seafish) that this decision limit has the potential to cut 80% of UK oyster production based on a survey of norovirus in production areas by Cefas. The FSA is representing UK in negotiations and has a key role to play here.
- We need to be clear that there is a risk of norovirus and that in the main this is not attributable to shellfish.
- The number of cases attributable to bivalve molluscs is not really the issue. No matter how much norovirus is detected there is no means to detect how much of that norovirus is viable.

Action: Keep the group informed of latest developments.

Seafood integrity

7. Farm Animal Welfare Committee opinion on the welfare of farmed fish.

Richard Aram, FAWC.

http://www.seafish.org/media/1173552/acigapril2014_fawc_opinion.pdf

The objective was to determine if there was a good science based understanding of the welfare issues and/or any gaps in the science; whether current welfare standards were sufficiently defined to accommodate any concerns raised; whether there were gaps in the legislation, codes of practice, or welfare accreditation schemes. The recommendations are: management baseline legislation for farmed fish; detailed requirements to be considered with increased knowledge; review compliance and enforcement of existing legislation; keep codes of practice under review; appoint a person responsible for animal welfare.

FAWC is also looking at what are the most effective parameters for humane killing. Concerns remain regarding welfare at slaughter, particularly regarding the application of inappropriate methods. There is also the opportunity to contribute to a report on the protection of farmed fish at killing by the EU Commission (EU Regulation 1099/2009). FAWC aims to provide the EU Commission with: parameters for humane methods; and details of methods FAWC considers inhumane based on the science. The second opinion is due to be published in May/June 2014.

Discussion

- Q. Industry has been waiting for this opinion. It was discussed at an Aquatic Health Check group meeting at Cefas and will be discussed at a Fish Health Working Group meeting in Scotland at the end of April. But how does the process work? Where does this opinion go? A. It goes to senior officials at Defra including the Chief Veterinary Officer. It needs a Government response and it is up to Government what they do with the advice.
- Q. Is there any religious dimension to this? A. there is some halal production but it is on a very small scale.
- Q. Does this have any impact on imports? A. FAWC would like to see the same standards across the supply chain.
- An EU Regulation was alluded to which will be mandatory not market-based. The FAWC is hoping to influence this but it is difficult to know the place of the FAWC. FAWC is an advisory committee to Government and is not a lobbying group.
- Q. If a Code of Practice is to be developed for farmed salmon are there any ramifications for wild caught? A. The FAWC remit only covers farmed fish, and shellfish is also outside the remit.

Action: Circulate new opinion when published.

8. Food safety/pesticide residues. David Mortimer, FSA.

http://www.seafish.org/media/1173558/acigapril2014_fsa_environmentalcontaminants.pdf

David detailed the key environmental contaminants and their regulatory framework and limits: dioxins & furans - chlorinated, brominated, mixed; halogenated biphenyls; polycyclic aromatic hydrocarbons; brominated flame retardants (BFRs); perfluorinated compounds (PFAS); other Stockholm POPs/ candidates; other dioxin-like compounds. He also commented on the prospect of new limits for BFRs (possible but not for some time) and PFAS (very unlikely).

Discussion

- The aquaculture industry was very badly burnt by the 2004 Ron Hites report which turned people off farmed salmon. The key has to be science and context. There are environmental pollutants and they appear in a large number of foods.
- The FSA did a good job of defending the farmed salmon industry and is well aware of the sensitivity. There is no reason for farmed salmon to be targeted as it is now likely to be less contaminated than wild due to tight feed controls.
- Q. With the improvement in detection methods it is possible to determine levels much better. Is determining a Tolerable Daily Intake (TDI) where the individual should have no adverse effects the ultimate yardstick? A. No this is a very complicated area. We take all the data to determine a limit, which is not linked directly to health. The purpose of limits is to keep the level of exposure of the general population down, and to have a regulation which allows the regulator to take contaminated products off the market. The limits are not necessarily safety limits.
- Q. Are levels changing over time? A. A total diet study has shown that dioxin and BFR levels are coming down, but all very slowly. There is an impression that levels are falling in foods, but we have to be aware of newer contaminants. The work the FSA is doing in this area should give consumers confidence that it remains vigilant about emerging risks.

9. Aquaponics and the formation of the British Aquaponics Association.

Andy Hughes, BAQUA. Cancelled on the day.

10. Species focus – sea bass and sea bream. Peter Tarrant, Maritek Worldwide Ltd.

<http://www.seafish.org/media/1174071/acigapril2014maritekseabasseabream.pdf>

Peter charted the development of the farmed sea bass and sea bream sector (mainly in Greece) and the more recent issues and challenges namely: large farmed bass has a yardstick – wild bass; the quality of the farmed bass and sea bream products needs to be improved and then remain consistent; the Mediterranean fish farmers need to address cash flow requirements is resulting in them selling small sized fish (300-400g).

Discussion

- Q. Are there outside entrepreneurs investing in the market? A. Yes there have been investors but there are no examples of a single foreign investor

that has integrated well with Greek production. It is usually the banks that have helped with finance but that is not so easy now.

- Q. Can you grow them to 600g+? A. You can grow them up to 1 kilo. And there are developments with regards to standards, including organic. More recently smaller and smaller fish are being sold to help fund operations which are struggling. In the past the Greek Government has not allowed these companies to go bankrupt, but that is not the case now.
- Q. Are there opportunities for other warm water marine fish? A. There are other species such as tuna, meagre and grouper, but the real issue is a lack of money to invest.
- Q. Can smaller operations manage to reduce production costs? A. There are limited opportunities for economies of scale.
- Q. Are there other countries that could enter the market? A. Yes such as Morocco and Saudi Arabia and there are some benefits. In Greece it takes 16-20 months to grow a fish big enough for market size, in these countries the same can be achieved in 9 months.

Action: It was agreed that the species focus for the next meeting would be trout.

11. In brief

11.1. Conferences - Association of Scottish Shellfish Growers Annual Conference, SAGB Annual Conference and Aquaculture UK 2014.

- David Jarrad updated the group on the 45th SAGB Annual Conference which is taking place at Fishmongers' Hall on 20 and 21 May.

Action: Full details to be circulated.

- Association of Scottish Shellfish Growers Annual Conference 2014. This will take place in Oban at the beginning of October. No full agenda yet.

Action: Full details to be circulated.

- Aquaculture UK 2014 will take place on 28 and 29 May at Macdonald Highland Resort in Aviemore.

Action: Full details to be circulated.

- Global Aquaculture Alliance's annual GOAL conference will take place from 7 to 10 October in Ho Chi Minh City, Vietnam.

Action: Full details to be circulated.

11.2. Seafish Risk Assessment for Sourcing Seafood (RASS). Tom Pickerell, Seafish.

This was mentioned at the last meeting. The RASS project is progressing and the aim is to provide objective advice to seafood buyers in the form of a risk assessment of the risks associated with buying from a particular fishery. The aquaculture elements are very much a work in progress. To avoid duplication of effort and to reflect the fact that certification standards are well established in this sector RASS intends to house the eco-certification benchmarking results of the GSSI process.

11.3. Seafish Corporate Plan and aquaculture review. Tom Pickerell, Seafish and Francis Murray. University of Stirling.

http://www.seafish.org/media/1173596/acigapril2014_seafish_reviewplan.pdf

Seafish Corporate Plan

The current Seafish Corporate Plan, which details how the Seafish levy should be spent, runs until March 2015. Seafish has now started the process of developing the new Corporate Plan which will run from April 2015 to March 2018. The Seafish Board met in late January to discuss the high level objectives which will likely remain as Protect, Promote and Inform. The three sector panels (which advise on Seafish workstreams and programmes) have also met and have looked at the issues and opportunities for targeting resources. Representatives from each of the three panels met on Monday 7 April to discuss the initial results and develop a coherent overview. The key areas raised were: the ethics of production; decreasing UK consumption; food security; regulation; media and media management; sustainability; and labour issues. Aquaculture was not in the preliminary draft of the current Corporate Plan but has scored well within the panels this time. Going forward the Board will meet again the second week in May to discuss workstream proposals; the panels will meet in July to discuss refined workstream proposals; there are further board meetings in September and December; the Corporate Plan will be signed off in December; and the devolved administrations will review this between December and March 2015.

Discussion

- Q. Is Seafish considering the potential for Scottish independence? A. We do have to recognize the constitutional implications of what could happen on 19 September. It will not be the status quo whatever the outcome. There will inevitably be changes at Government level and down the line and Seafish needs to be alive to possible issues.
- However, it is really a question of what we can do at this time. We do not know whether this will be within the timeframe of the next Corporate Plan so we have to operate as usual going forward.

Seafish Aquaculture Review

Francis outlined details about the review currently underway of the services provided by Seafish in relation to the UK aquaculture market. The aim is to: show how the role of Seafish has changed and developed over the past thirty years as it strived to identify and support the needs of the aquaculture sector; make recommendations on where Seafish should/could be focusing on aquaculture (both domestic and imported); make recommendations on how Seafish could most appropriately invest in aquaculture technical and information needs - and assess potential gains from such investments.

Action: Flag up the survey to the whole ACIG circulation list.

11.4. Certification update. Karen Green, Seafish.

A paper was tabled prior to the meeting with an update of the progress re the various certification schemes.

http://www.seafish.org/media/1170986/seafishupdate_aquaculturecertification_201403.pdf

11.5. GSSI. Tom Pickerell, Seafish.

The Global Sustainable Seafood Initiative is a three year programme to bring clarity and transparency by providing a tool to benchmark seafood certification schemes. Expert working groups have been formed covering processing, fisheries and aquaculture that have met two to three times. Draft Benchmarking Criteria has been produced and the next step is to get selected experts from the standard bodies to look at this before an external consultation. The aquaculture working group is made up of a mix of industry and NGOs – updates will be provided at ESE in Brussels in May, and at World Aquaculture 2014 in Adelaide and Aquavision 2014 in Norway in June. Consultation workshops are due to be held in May and June and this will be the first time that the seafood industry will become involved. From July-September pilot testing of the benchmarking framework and process will take place with six international certification programmes.

Discussion

- There was a session on GSSI at the Boston Seafood Show. It should be noted that GSSI has no social component. It looks at Chain of Custody and environmental factors and has a lot of support from retailers.
- There have been comments that GSSI is in effect creating another standard.
- GSSI is not a standard but it is a measure.
- There have been concerns about its environmental credentials – what must be avoided is a race for the middle ground and the creation of a cheaper alternative to MSC.
- Jim Masters is leaving the MCS and was on the GSSI Board. It would be an opportunity for another NGO to step in, especially a European one to maintain the balance of representation.

Action: CLG to be kept up-to-date with developments.

11.6. Sustainable Seafood Coalition. Katie Miller, ClientEarth.

Katie reported that the SSC now has 27 members. Two voluntary codes are progressing – covering self-declared claims for sourcing and labelling – and these will be launched together. There will also be a six week consultation period, which will cover both codes, which is due to start at the end of April.

Action: ACIG to be kept up-to-date with developments.

12. Any other business

12.1 Water quality

- There has been a lot of talk about the Water Framework Directive (WFD), the Shellfish Waters Directive and microbial standards within the WFD, and also about the changes from a class B to a class C for 12 UK waters, with more changes planned for September. This was clarified in that the downgrade of some beds from class B to C is down to a change in the way the Food Standards Agency is now assessing the shellfish standards under the Food Hygiene Regulations (as a result of a recent review by the EU Food & Veterinary Office), which are designed to protect human

health. The changes in classification came in at the end of April following an informal consultation on options that FSA ran last year. These changes (and standards) have nothing to do with WFD which has a different standard, usually referred to as the Guideline flesh standard (WFD is about achieving the right environmental outcomes in shellfish waters, which are much bigger areas than individual harvesting beds, which therefore protects public health).

- There are concerns that nobody is protecting our waters and that there have been no real changes in our waters and yet downgrades are happening. It was clarified that Defra have remained consistent in their steer to the EA that we must endeavour to achieve the Guideline flesh standard, as the legislation requires. Therefore with an unchanged driver the work of the EA, to protect and improve water quality in order to increase compliance with this objective, has not changed.
- There has been a change in that Defra is no longer using the Environmental Agency to take samples. It was clarified that the change has been made possible by the repeal of the Shellfish Waters Directive. The EA has used this opportunity to move from assessing compliance with the flesh standard of the Directive (≤ 300 E.coli) using only the 4 samples per shellfish water, which were taken under SWD, to using all the samples from all the harvesting beds, which are taken by Local Authorities on behalf of the FSA for hygiene regs purposes. The increased number of samples will result in a more confident assessment of the quality of shellfish waters and identification of any trends in their quality.
- The domestic shellfish regulations do still stand and this encompasses all the work that the Environment Agency is doing to ensure standards are maintained. Defra lawyers are working on transposing domestic legislation. The measures necessary to improve water quality are very costly and evidence is needed to assess the cost/benefit. A consultation on the draft plans (which will include shellfish waters) is due to be published on 22 September. This consultation will be on the proposed update to River Basin Plans, which were first published in 2009. The consultation will set out the statutory objectives for the water environment to 2027 and the proposed actions necessary to achieve them.

Action: This will be an agenda item at the next meeting.

13. Date of next meeting

Aquaculture meetings are to be held twice a year to dovetail with the CLG. The next meeting will be on 23 September 2014 at Billingsgate market in London.