

SEAFOOD ETHICS ACTION ALLIANCE (SEA Alliance)

Notes on Seafood Ethics Action Alliance (SEA Alliance) meeting. Wednesday 30 January 2019. London.

In attendance:

Aisha Aswani	Co-op
Alastair Maxwell	Sea Dragon Ltd
Alex Olsen	Espersen
Amber Madley	Lovering Foods Ltd
Andy Hickman	Tesco
Caitlin Schindler	Bidfresh/Direct Seafoods
Claire Sammons	Lidl UK
Dominique Gautier	Seafresh
Helen Duggan	Seafish
Karen Green	Seafish
Kevin Powell	Seachill
Laky Zervudachi	Direct Seafoods
Lara Funk	Seafish
Louise McCafferty	Joseph Robertson
Malcolm Harris	Sea Dragon Ltd
Melissa Pritchard	New England Seafoods
Mike Mitchell	Fair Seas
Nick Kightley	Ethical Trading Initiative
Robert Greenwood	NFFO/FWA
Sarah Hussey	Seafresh
Stuart McLanaghan	Seafish

Apologies

Ally Dingwall	Sainsburys
Estelle Brennan	Lyons Seafoods
Emily Pearce	Co-op
Joe Prosho	Morrisons
Leonor Fishman	LDH (La Doria) Ltd
Lucy Blow	NESI
Mike Short	Seafood Industry Alliance
Peter Andrews	British Retail Consortium

1. Introduction and Steering Group membership

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.

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

Amber Madley	Lovering Foods
Andy Hickman	Tesco

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Emily Pearce	Co-op
Estelle Brennan	Lyons Seafoods
Joe Prosho	Morrisons
Karen Green	Seafish (secretariat)
Kevin Powell	Seachill
Leah Riley-Brown	British Retail Consortium
Lucy Blow	New England Seafood
Melissa Pritchard	New England Seafood
Mike Mitchell	Fair Seas
Mike Short	Seafood Industry Alliance
Peter Andrews	British Retail Consortium
Sam Ludlow-Taylor	Waitrose

2. Actions arising from 11 July 2018 meeting.

- **Structure:** To add the Co-op to the list of engaged organisations. *Completed.*
- **To add the SEA Alliance strategy and position statement to the web page and develop a working framework.** *This is for discussion today.*
- **Letter to Royal Thai Government re ratification of ILO 188.** *This was completed and a copy sent round the group.*
- A **watching brief** is being maintained re the Responsible Fishing Scheme; the Alaskan Salmon Group; the Consumer Goods Forum Sustainable Supply Chain Initiative/Global Sustainable Seafood Initiative collaboration; DFID Indonesia work; and the Sedex module for fishing vessels. *Updates are being communicated through Seafood Ethics Common Language Group newsletters.*

3. The SEA Alliance Vision/framework and process

3.1 Vision/Framework. The proposed SEA Alliance Vision/Framework had been circulated around the group prior to the meeting. No comments have been received and no comments were made at the meeting. The Vision states:

Vision

The SEA Alliance will aim to deliver best practice solutions to identified, defined, and prioritised, ethical and welfare seafood issues affecting the UK and Ireland seafood sectors, including international and domestic supply chains. The SEA Alliance will build on the experience of participants in order to generate positive action and appropriate advocacy to improve working environments for seafood workers.

Working framework

SEA Alliance participants will work collaboratively to provide assurance of legal and responsible practices in our supply chains, and where we perceive the need, we will actively seek to improve standards. We will do this in two ways:

- A). By improving our knowledge and assisting and advising in the development of supply chain tools;*
- B). By advocating for improved workplace conditions and listening to the worker voice through our member activities.*

3.2. SEA Alliance Process flow.

This is the means by which the SEA Alliance will determine forthcoming work programmes.

Actions arising:

- The Vision/Framework will be circulated to the group with the minutes for any final comments before being added to the website.
- The process flow will be circulated to the group with the minutes for any final comments before being added to the website.

4. PAS 1550:2017 – Code of Practice for industry

The PAS 1550:2017 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. Details were presented at the SECLG meeting earlier in the day. The intention was to have a discussion within the SEA Alliance meeting about what concrete actions could be considered, with the objective of supporting the implementation of PAS 1550 within our industry and demonstrating to the NGO community that we are seriously taking into consideration their recommendations.

Comments made:

- On the vessel side the Fishermen's Welfare Alliance are looking to incorporate aspects of PAS 1550 within Safety Folder.
- From an industry perspective whilst this is a valuable reference source a huge amount of work would be required for businesses to implement all of this and it could be very expensive.
- It is the 'how' to implement PAS 1550 that is missing. Businesses do not necessarily know what to do. A lot of this is about traceability and IUU, not ethics, so this could be of interest to the Common Language Group as well.
- One member had been through the whole PAS to create effectively an audit checklist. This produced 140 'audit' lines.
- The SEA Alliance Terms of Reference does mention the PAS and states: *'Engagement will take into consideration the PAS 1550:2017 Code of Practice on Exercising due diligence in establishing the legal origin of seafood products and marine ingredients, and the BRC IUU Advisory Note (2015), together with meaningful implementation of ILO 188 and other appropriate instruments.'* We should heed this.
- We could see PAS 1550 as a toolbox and not an audit checklist.
- We need to adopt a common-sense approach and see where this is going to go and how it is going to develop. There is talk of this Code of Practice becoming a British Standard third-party audited system.

Actions arising:

- Could form a small working group to look at 'how' we would implement PAS 1550 and maybe start with the 140 'audit' lines.
- Could extract the ethical/social components from the list.
- Could liaise more with EIJ to see what work they have done on the 'how'.

5. EIJ 10 Global Transparency Principles. How can/should the SEA Alliance support these

principles? The Environmental Justice Foundation is about to write to the CEO's of all the major retailers asking them to commit to the ten Global Transparency principles. They are:

- **Vessel numbering:** Require IMO numbers, national UVIs and support FAO Global Record of Fishing Vessels
- **Tracking:** Require AIS or share VMS data
- **Vessel register:** Public digital register of vessels and authorisations, based on UVIs
- **Sanctions:** Publish up-to-date lists of arrests and sanctions
- **Trans-shipments:** Ban unmonitored trans-shipments at sea
- **Traceability:** Mandate digital collection of key data elements on vessel registration, licenses, unloading, catch (including location) and crew.
- **Flags of Convenience:** Close open registries and block FoCs from coastal state waters and importing seafood.
- **Beneficial Ownership:** Publish information on true owners
- **Nationals:** Public register of nationals who own or operate vessels under other flags and sanctions for infractions
- **Treaties:** Ratify and implement FAO PSMA, ILO C188 and IMO Cape Town Agreement

Comments made:

- This is an advocacy/lobbying list that the SEA Alliance could publically advocate that Government adopts.
- There could be benefit in developing an e-learning training module.

Actions arising:

- The small working group mentioned above could also look at next steps re the 10 principles.

6. FAO developing guidance on social responsibility in the fisheries sector. For SEA Alliance to discuss whether, what or who could input to its development and at least ensure we track it.

Numerous international and national initiatives are calling for increased social responsibility and improvements in social and labour conditions in fisheries value chains. The COFI Sub-Committee on Fish Trade (COFI:FT) decided in July 2018 that FAO guidance on social sustainability should be developed in cooperation with relevant stakeholders, including industry and fish worker associations, building on experience from the development of the OECD/FAO – Guidance for Responsible Agricultural Supply Chains. This process is underway and the FAO presented on this at the SECLG meeting.

Comments made:

- This could be a real game-changer.
- There is a brilliant window of opportunity to comment on and engage with this process but we do need to see the draft.
- We could offer to host a workshop.

Actions arising:

- Follow up with Audun Lem at FAO to see how the UK seafood industry can engage with this process and comment on the draft.
- Speak to Ally Dingwall who has already engaged with this process.
- Look at the OECD/FAO Guidance for Responsible Agricultural Supply Chains to see what the potential cross-overs could be.

7. Developments re the Sedex module for fishing vessels.

Kevin explained the latest position with the Sedex-based Fishing Vessel Questionnaire. A lot of vessel owners have been unsure about the Sedex questionnaire, and there has been very little uptake, so Seachill and Tesco have been talking to Sedex about this. Subsequent to the SEA Alliance meeting the Sedex proposal arrived and is detailed here.

Sedex are proposing:

A first contact, pre-risk assessment information gathering tool for vessels. *(First step in capturing vessel welfare details – shows skippers/vessel owners type of information that is now becoming normal in ethical trade.)*

- Questions have been updated – industry working group revision
- Option still exists for vessels/groups of vessels to become Sedex “B” members and fill in vessel module. They can then be linked to suppliers/customers as per Sedex normal system. This will allow any vessel audits to be uploaded (eg. RFS). Cost to vessel is £100 Sedex joining fee.
- Sedex to build the ‘Webform’ system which will be piloted by Seachill.
 - Webform will be a website where the questionnaire is presented.
 - Vessels/groups of vessels/associated industry bodies etc. will be able to complete the questionnaire for free during the 12 month pilot. Data will be available for all in scheme to review.
 - Vessel audits will not be able to be attached or uploaded.
- The proposal is to run this through the SEA Alliance:

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- The SEA Alliance will act as co-ordinator. Seachill will oversee this.
- Members can suggest vessels/groups of vessels/industry associations etc. to pilot scheme eg. fleet owners or SWFA with associated vessels operating to same standards/recruitment criteria could enter data collectively.
- Pilot would run for 12 months.
- Sedex to compile project plan.
- SEA Alliance to suggest launch 'e-mail' content and site 'landing page' content (which can be same). Seachill will co-ordinate this.

Comments made:

- The NFFO would be happy to engage with this.
- From the start we need to be clear who we mean by the 'vessel owner'. This could be qualified by actually stating the 'person responsible for implementing ILO 188'.
- **Q.** Are you asking for feedback on the questions themselves? **A.** No. There are 35 questions and they are final. The feedback will be more to do with who we approach to take part, how we phrase the contact email, the working on the landing page on webform etc

Actions arising:

- Sedex proposal to be communicated to whole group.
- Draft supporting text to be produced for comment.

8. Formal recognition by the SEA Alliance in their membership/support of the Fishermen's Welfare Alliance (FWA).

The FWA is re-looking at its Terms of Reference and is hoping to encourage more engagement. The SEA Alliance actually covers two of their stakeholder groups – retailers and processors – which they actively separate.

Actions arising:

- The SEA Alliance to draw up a statement of support.

9. Fishwise RISE project.

The FishWise RISE project looks at best practice. This web resource is designed to support retailers and processors develop guidelines on what good looks like, what decent working conditions look like, what is best practice etc. This resource is due to launch in March 2019 at the Boston Seafood Show. FishWise are looking for industry input and have offered to run a webinar for the Steering Group, or the whole SEA Alliance, if we are interested. This is a web-based system with lots of links. There is reference to an action-based roadmap but it is not clear if/how they will achieve this.

Actions arising:

- SEA Alliance to keep a watching brief and engage when asked.

10. Potential funding opportunities

Andy Hickman attended an IUU/Human Rights workshop on Wednesday 30 January 2019 in London attended by a number of US funders. Predominantly they are looking for projects to fund and mostly these are of an investigative/research nature, with very little market engagement. This does raise the question as to whether the work the UK seafood industry wants to do would align with their interests, and what options there may be for engagement. There was also talk of a new model of funding whereby they would make a loan for a project, and if all objectives of the project funded were met the loan would not need to be repaid.

Comments made:

- Does raise the wonderful question. If you had a pot of money what would you do with it?
- We could collectively discuss where we would like to focus more research work.
- There is currently no global hotline for fishers. If you are a member of the ITF they do have a global hotline but as a percentage not many fishers are members of the ITF. There was also mention of ISWAN (Promoting and supporting the welfare of seafarers). SeafarerHelp

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is their free, 24-hour, multilingual helpline for seafarers and their families. Any such initiative would involve a huge resource to launch and support.

- An initiative to support representation on vessels would be welcome.

Actions arising:

- Identify the key individuals and contact them to create awareness of the SEA Alliance.

11. The next SEA Alliance meeting

The next meeting will take place after the SECLG meeting on **Wednesday 3 July 2019** at Fishmongers' Hall, London Bridge, London.

Actions arising

SEA Framework

- The SEA Alliance Vision/Framework will be circulated to the group with the minutes for any final comments before being added to the website.
- The SEA Alliance process flow will be circulated to the group with the minutes for any final comments before being added to the website.

PAS 1550 and global principles

- Could form a small working group to look at 'how' we would implement PAS 1550 and maybe start with the 140 'audit' lines.
- Could extract the ethical/social components from the list.
- Could liaise more with EJF to see what work they have done on the 'how'.
- Look at SEA Alliance next steps re the 10 principles.

FAO guidance on social responsibility

- Follow up with Audun Lem at FAO to see how the UK seafood industry can engage with this process and comment on the draft.
- Speak to Ally Dingwall who has already engaged with this process.
- Look at the OECD/FAO Guidance for Responsible Agricultural Supply Chains to see what the potential cross-overs could be.

Developments re the Sedex module for fishing vessels

- Sedex proposal to be communicated to whole group.
- Draft supporting text to be produced for comment.

Formal recognition by the SEA Alliance in their membership/support of the Fishermen's Welfare Alliance (FWA)

- The SEA Alliance to draw up a statement of support.

FishWise RISE project

- SEA Alliance to keep a watching brief and engage when asked.

Potential funding opportunities

- Identify the key individuals and contact them to create awareness of the SEA Alliance.