



Scoping Study for a Responsible Fishing Port Standard

Standard Scoping Project for a Responsible Fishing Port and Market Standard

Background

The members of the BPA Fishing Ports Group, over recent years, have become increasingly aware that the multitude of legislative, environmental and operational procedures carried out and by each Port around the UK leave the group open to different interpretations of how they should be enforced. They believe this has resulted in potential inconsistencies that have led to the ports within the group conducting similar operations in different ways. The group believe that although these differences of how legislation is enforced may be down to individual port requirements, they feel that there is an opportunity to harmonise their operations in many aspects of Port landings by the development of a potential “Responsible Port” Standard.

The potential benefits for each port would be the exchange of ideas and recommendations that would bring some uniformity and structure to their individual operations. The scoping project will seek collaboration on UK basis with the ports and the supply chain to develop a set of objectives that this standard would achieve, and establish how it would complement the existing Responsible Fishing Scheme (RFS) to develop confidence in the auctions and fish markets for buyers and sellers.

Stage 1

The first stage of the work involved canvassing members of the BPA fishing ports group using telephone interviews, and 2 ports were visited. The following key areas were discussed:

- (i) the current attitudes of the ports sector to using the key objectives of the RFS and other standards and the need to harmonise operations within this Port sector to develop a standard
- (ii) overall strengths and weaknesses of a standard, and associated risks of which areas should be included
- (iii) the feasibility of establishing standard’s value to the port industry and its funding
- (iv) the feasibility of establishing standard’s benefits to the wider supply chain
- (v) recommendation whether and under what conditions to develop this standard

Feedback from ports:

8 ports in favour – 3 large, 2 small and 3 medium size ports

3 Ports undecided – 1 large and 2 small ports

1 port not in favour – 1 medium could not see a direct benefit to their sector

Areas to be included:

- Hygiene levels – inside and out
- Structural Condition- inside and out

- Quality Maintenance
- Grading compliance
- Traceability
- Waste Management and Recycling
- Environmental Controls
- Service provision- Electricity, Fuel, Ice, storage, net mending etc

Discards were not to be included as legislation is not ready and should be in second phase of any the standard development

Benefits to the Port Sector were considered to be:-

- Improved profile
- Improved image
- Improved service provision to Fishers/Supply Chain
- Unification of sector- self regulation and strong voice to discuss legislation implementation
- Improved operating standards
- Improved funding opportunities to enhance the port sector

Benefits to the Supply Chain

- Greater level of assurance to the supply chain and fishers – e.g. quality and grading consistency
- Greater transparency and consistency to the supply chain and fishers – on what is and is not good practice in a port
- Electronic Auctions if adopted- better choice of ports from which a buyer can select to purchase fish
- Fish purchased through an auction market port should deliver better processes to the fishers rather than direct sells, and this may mean that fishers are rewarded with more value for their catch
- Greater assurance that no IUU fish is landed into the supply chain
- Full traceability of the fisher and product through the port to the supply chain

Compliance and Development Conditions

- Need to develop code of practices for how each area covered by the standard should be complied with
- All ports, whether auction or not, shall be able to comply with or be able to improve in order to be able to comply with
- Should two standards be developed, one for auction markets and one for just landing ports?
- Needs to have a robust/transparent/consistent way of monitoring and assessing a port to the standard

- Needs to cover all people/operations within the port by getting them to sign up and commit to the objectives of a proposed standard if this programme is to have any credibility
- The level of compliance needs to be higher than legal requirements for the standard to have credibility within the port and supply chain sector
- Voluntary scheme, as standard will be designed to encourage a change in culture as to the way fish is handled and dealt within in the port sector
- Care in development is required to ensure that compliance to the standard is not cost prohibitive

Stage 2

The second stage of the project was to canvass the wider supply chain and catching sector, seeking their views on the development of a Responsible Fishing Port Standard. In total, 19 interviews were conducted with the following organisations; with each covering a specific section of the supply chain. The feedback was follows:

Regulatory

Regulators consider this initiative timely and welcome as they support the RFS and that fish landed should be labelled for traceability and legislative compliance. Regulators think that the ports have a part to play, and if this standard can support this it will be of benefit to complying with this new legislation that came in force in March 2015.

In addition, a recognised standard that could be certified against would support their inspectorate, as they risk-rate inspections and a certificate to an approved standard would certainly be taken into account.

Fisherman Organisations

These organisations support initiatives to help raise standards and the public image of this sector, especially in those areas highlighted in stage one of this scoping project. However, they feel that not all the ports could be assessed in the same way and work would need to be done in defining a port on; what it can do, what it can offer? etc., before a standard could be formulated.

In addition, they feel that a standard would help give greater assurance and transparency on what the supply chain and fishers could expect from a port and help to minimise potential detrimental effects on the landed catch with regards to quality and traceability and may help to maximise the value of the landings.

Primary Processors

Main issues raised by this sector relate to a lack of fish so, if a standard could help to give a better services to fishers by improving the way the fish is handled and if it could give an assurance to the buyers, this would be good for both legal due diligence and traceability reasons.

On the possibility of two standards (one for landing ports and one for auctions) they think this would work as it would address how the traceability requirements and quality aspects could be maintained or enhanced for fish transported from these landing ports to be sold in the port auction market, there-by helping to give greater assurance to buyers.

In addition, perhaps the ports could offer more visualisation e.g. videos of the catch so that remote buyers could see what they are buying – this, again, would create more trust.

Better /enhanced/ consistent port operations might attract back the bigger buyers who left primarily for loss of traceability and quality inconsistency reasons.

Enhanced services to fishermen who then would know what to expect at a certified port, so again could lead to better quality /maintained fish.

All areas covered in the Stage 1 of this scoping initiative would be advantageous to be incorporated into a good responsible port standard; however, if the standard were developed, the ports and other users (stakeholders) would have to buy into the process, and it should not be set at a level too low whereby it could become a tick box exercise and therefore be meaningless to the supply chain

Secondary Processors

This sector does not engage directly with the ports or markets in the UK; however, it would encourage the adoption of standards on hygiene, temperature control, and traceability to maintain the good work of RFS certified vessels. A port standard should also include waste disposal, recycling etc. Port auctions can obtain BRC certification for hygiene and pest control etc., above legal minimums. Could this RFP standard fill a gap below this level of sophistication as parts of the BRC certification are not strictly relevant and port standard could address this issues more effectively?

Ports and auctions could fast become the weakest link in the 'due diligence' supply chain requirements, so the standard could become an important part of the supply chain to audit and certify against process.

Development of a ports standard as an extension to RFS under the same umbrella would therefore be advantageous, as the secondary processing sector has tended to bypass the market due to issues of price and continuity of supply. In addition, these processors prefer increasingly to be supplied directly from fishing vessels as they can exert greater influence over these vessels' standards. However, depending on what the port standard contains, they may look again at the markets for species they cannot source directly, especially if there were an agreed standard for weight, traceability assurance etc.

Finally, this standard and the RFS would develop a more professional culture in the industry, which would be more in line with other protein producers, such as the poultry industry.

Agents and Auctioneers

All areas covered in the standard should be as stated by the ports in stage 1, benefits, image, recognition and seal of approval; they think it will bring all ports up to a certain standard and improve the service to the fishers and the supply chain. Need to **encourage all ports to be engaged** as some ports do a better job than others, but the standard should be voluntary and be above the minimum legal requirements. If not, buyers may insist upon this standard, which could have detrimental effect for the fishers who may be forced to travel further to certified ports to land their catch, with potential consequences of increased fuel expenses and loss of fish quality.

A standard would also provide more assurance to the supply chain that they would get the right quality consistently, enhancing opportunities to sell UK fish into the UK market. In addition, the supply chain are increasing their demands on what assurances are required e.g. the need for enhanced traceability from the boat through the market back to the date and location of capture.

Standard Assessment Cost may be supportive of contributing if they could see the standard benefitting the long term viability of the industry, but the standard should not go into too much detail that it takes over 1 day to complete the audit

Retailers

Think that this sector needs to be reviewed; the retailers have concerns with the potential lack of segregation/traceability/chain of custody from certified RFS vessels as product passes through the market. If a standard can support this, they would be in favour.

In addition, the standard would address the area on the maintenance of fish quality by adopting good handling practices.

A Standard should also benefit the international market as it would complement the RFS and create more assurance in the global supply chain.

The retail sector thinks the applicant should be the port together with the agent/broker; if not, the port authorities should be able to licence to improve the regulation of the agents/brokers operating on their facilities.

Will be difficult to set a standard, but just because it's difficult does not mean that it should not be developed.

Food Service

Think it's a good initiative to ensure that the good practices required for the RFS are adopted and continued on through the ports in order to treat fish "as food " and help maintain the catch quality. This sector felt a standard would also give the supply chain more insight into what a port can deliver, and by whom etc., enabling it (supply chain) to drill down to areas of possible non-compliance and the individual sector most responsible.

A major challenge would be to identify the appropriate applicant - port authority or agent, or both?

A standard would help close a perceived gap in traceability and ownership, improving 'due diligence' within the supply chain and providing greater assurance (within the supply chain) that the fish is being treated correctly. An additional benefit is that buyers could undertake remote buying opportunities and so access more market auctions, as they would have **greater trust** in the standards that the certified market operate to, which could provide greater choice to the supply chain and possibility better prices to the catchers.

Non-Government Organisation

NGOs think that a standard could support codes that have been developed as part of their work on the Sustainable Seafood Coalition and which have been signed up to by their members, including the majority of retailer/processors in the UK. It could also assist their members by helping to provide traceability assurance. This could be an important 'tool' to help eradicate the possibilities of IUU fish entering the supply chain.

Think it would also support the vessel RFS by offering improved services and facilities and feel that it may also have international benefits as well.

Stage 3 Terms of Reference (TOR) for potential standard

This stage involved convening a working group to suggest and agree possible objectives of Responsible Port Standard and certification requirements. The working group comprised the following organisations;

- 1 NGO
- 1 FPO
- 1 Agent
- 2 Primary Processors
- 2 Retailers
- 1 Food Service
- 2 Small Ports
- 2 Medium/Large Ports

The working group agreed the following points;-

- The group, overall, were in favour of developing a standard to promote the fishing industry brand and plug the perceived gap in chain of custody from the vessel to the buyers.
- The standard should be complied with by all type of ports; however, all sectors of the port operations would need to be engaged in the process to ensure that any cost implications could be spread out accordingly.
- The standard would be developed in a modular type format covering key aspects, such as Hygiene, Structural condition and Environment controls that could be complied with by all ports as well as separate modules more specific to auctions such as traceability, quality control, grading etc. However, greater detail on what would be included would need to be discussed and agreed upon once approval to progress this standard's development had been ratified.
- The standard would be voluntary; and if a port could not comply initially, they could be taken on an improvement journey that would be recognized by the supply chain, if it were structured appropriately.
- The standard would be developed to comply with ISO 17065 certification requirements and/or ISEAL recognition.
- To avoid confusion, the standard should be standalone but have strong affinities with the RFS programme; and it should be known as the **Responsible Fishing Port Standard** to identify that it is only for fishing ports and not other categories of ports. Also, once developed, it could be adopted by SALSA but this would need further investigation to see if this were possible and indeed required.
- Finally, the following is a possible key message/objective for this standard -

“Support the long term development and maintenance of a credible and robust third party certification programme for all types of UK commercial fishing ports, that will provide assurance to the UK seafood industry, key stakeholders and seafood supply chain, that all certified or engaged ports within this programme are acting in a responsible manner, that will support and develop greater assurance and transparency within the Seafood Industry.”

Concluding Remarks

This feasibility study concludes that it would be possible to construction and implement a Responsible Fishing Ports Standard that would deliver a degree of certainty for the end user by incorporating specific modules that would need to be complied with by all prospective, applicant fishing ports wishing to gain credible certification (to it).

The applicant port would be based solely on fish landing ports and fish auction ports; it would be proposed that commercial fishing ports that do not handle fishing vessels would not be applicable for this standard.

The standard should be based on areas that are in the control of the port authorities and users of the port, and should cover the following 5 key areas that complement the RFS scheme and other recognised on-shore food safety and chain of custody standards.

- **Care of the Catch (Core Modules for all Ports)**

- Hygiene levels – inside and out
- Structural Condition- inside and out
- Quality Maintenance
- Temperature Control

- **Chain of Custody (Additional Modules for Auction Ports)**

- Grading compliance
- Traceability
- Labelling provision

- **Care of the Environment (Core Modules for all Ports)**

- Waste Management
- Recycling
- Environmental Controls

- **Service provision (Aspiration Module)**

- Electricity
- Fuel
- Ice
- Plus others

- **The port and its mission (Core Modules for all Ports)**

- Demonstrate Due diligence and Compliance with legislation
- Improve skills and knowledge training provision

The standard would be developed to comply with relevant international guidelines for the development and certification of programmes, such as ISO/IEC 17065 2012 (specifies general requirements for third-party operating a product certification system) and the International Social

and Environmental Accreditation and Labelling Alliance (ISEAL) Code of Good Practice (for setting social and environmental standards), to ensure that it would give complete credibility to the applicant port and full transparency of what it will denote to the users of the port and the supply chain.

The development of the new Responsible Fishing Port Standard would need to follow a robust process to ensure that all stakeholders potentially affected, either directly or indirectly, by the new scheme would have an opportunity to state what should be in the new standard. In addition, a full, transparent and credible governance structure would need to be introduced to ensure that the developed standard and the certification programme could be accredited to meet the requirements of ISO 17065. The following structure is suggested.

Oversight Board- Selected organisations would be chosen for their credibility, similar to the makeup of the working group used in stage 3, and would be tasked by the BPA Board to give a strategic overview to the direction the scheme and to finalise and agreed the standard's Terms Of Reference (TOR). This Oversight board would promote broad stakeholder involvement, consensus, and transparency to the standard's development process. Seafish staff and the consultants to the programme would be involved to give guidance and oversight for this process.

The Oversight board would be tasked with giving direction to the scheme's Technical Committee to develop the conformance criteria required within the Responsible Fishing Port (RFP) standard and would be the governance body that would recommend approval of the final version of the RFP standard for approval by the BPA.

RFPS Technical Committee- The RFPS Technical Committee would be tasked with developing each standard's conformance criteria with the assistance of separate working groups for each specific module within the RFPS scheme.

The Technical Committee and working groups would be composed of technical experts and representatives of those groups interested in or affected by the scheme. The Oversight Board would need to approve each of the working groups' membership, to ensure that each of the working groups represented a balance of stakeholders and had the credibility to develop the required RFPS module.

Proposed RFP Development Process

The development stages used in the preparation of this RFPS are proposed as follows.

1. Outline of Standard modules drafted and agreed by the Oversight Board
2. Technical Committee Working Group draft of RFP Standard conformance criteria for each agreed RFP module
3. Technical Committee approved draft of RFP Standard
4. Oversight Board approved draft of RFP Standard

5. Public comment draft on the RFP Standard following 60 day Public Consultation on Seafish Website and through direct canvassing of affected stakeholders by BPA/Seafish Staff
6. Final Oversight Board draft for RFP Standard
7. Oversight Board review and Recommendation for approval of RFP Standard
8. Seafish final approval for RFP Standard

The length of time from the point of approval to creating a standard that would be in a position to be certified against would be in the region of 12-18 months.