

Notes on the Responsible Fishing Ports Scheme (RFPS)- Technical Committee Meeting at Wesley Hotel, London	
Date:	22/11/2017
Attendees:	<p>Martyn Boyers (Grimsby Port/ Chair of British Ports Association Fishing Ports Group BPAFPG) Matt Bailey (Brixham Trawler Agents) Pete Bromley (Sutton Harbour) Rob Parsons (Newlyn Fish Market) Laky Zervudachi (Direct Seafoods) Leah Buckley (MSC)</p> <p>Sam Peacock (RS Standards) - Consultant Marcus Jacklin (Seafish) - Programme Manager Hannah Fawcett (Seafish)</p>
Apologies:	<p>Jonathan Shepherd (Seafish Board) - Chair John Forman (Peterhead HM) Dave Bartlett (Brixham HM) Dave John McRobbie (Don Fishing - Scotland) Lesley Fairhurst (Waitrose) Nick Kightley (Ethical Trading Initiative) Michaela Archer (Seafish)</p>

Key discussion points

1. Welcome and outline of the agenda and mission for the day.

M Jacklin welcomed members and introduced Sam Peacock (RS Standards) who is working with Seafish on developing the Responsible Fishing Ports Scheme. He summarised the purpose of the meeting, which was to review proposed modifications with a view to producing a version of the standard suitable for public consultation, subject to approval by the Oversight Board.

This meeting focused primarily on the on the need for agreement on key considerations; proposed changes to clauses within the standard, made as a result of TC feedback, previous port visit and four completed trial audits; and actual changes, in particular clauses added or removed.

The meeting was split into two main parts; the first discussed overarching key considerations, the second focussed on changes to specific clauses.

2. Key Considerations.

1. Scope

It was proposed that all fish landed through the port should be in scope for a port to be able to be certified to the standard. It was considered unacceptable for port to handle product not subject to the standard (i.e. for any products passing through a certified port to be uncertified).

TC agreed with proposals.

2. Definition of Applicant

Following feedback from auditor assessment, it was proposed that the applicant should be the port authority and that the unit of certification should be the port infrastructure and associated processes. TC members agreed that clauses to be adhered to by other organisations operating within the market would be identified through the Memorandum of Understanding.

TC agreed with proposals.

3. Worker Welfare

Several trial ports noted that the harbour authority and many agents have only a small number of employees, rendering some of the worker welfare requirements (such as the requirement for an elected employee representative) excessive.

The TC agreed that worker-welfare requirements should cover direct port employees. The TC rejected the proposal to add references to 'relevant employees'. The TC concluded that port employees should be covered by all clauses; other workers at the port should be covered by due diligence (i.e. clause 2.24)

Port should conduct 'due diligence' with other organisations to require them to respect workers' rights. These other organisations are covered by clause 2.24 (edited to remove reference to 'relevant employees').

TC rejected proposal & agreed the above changes instead.

4. Complexity in Ports

The trial audit findings highlighted the highly variable relationships between the port authority and organisations working on the 'market'. This rendered unworkable the simplistic approach of these two entities adequately being able to address all clauses within the standard. The TC agreed with the proposal that the port should be the

applicant and should ensure that clauses were addressed by relevant organisations identified in the MOU.

The TC agreed also with the proposal to create equivalencies whereby ports would be able to employ different methodologies to mitigate risk, depending upon a port's individual circumstances.

TC agreed with proposals.

5. Non-Standard Landings

At some ports, some fish are landed without passing through the full market mechanism; for example, they may be landed as consignments directly into transport vehicles. The trial methodology did not audit this type of activity to ensure it meets any applicable requirements in the standard.

The TC agreed with a proposal to include a section in the application form in which the applicant should indicate the extent to which such activity occurs and therefore enable the CB to plan the audit accordingly. Fish landed in this way will be subject to any applicable requirements – e.g. those relating to traceability, handling, etc.

TC agreed with proposals.

6. Overly-Prescriptive Requirements

In many areas, the trial standard was found to be overly prescriptive. The objective of the scheme is to ensure that ports have taken steps to mitigate potential risks. Many clauses of the trial standard specified the action to be taken to mitigate a given risk, rather than leaving the specific mitigation methodology open to the port. This meant that in some cases the port was adequately mitigating a risk but did not meet the requirements of the standard because a different method was used.

Also, the specific wording of the clauses leaves open the possibility of many “Not Applicable” scores where the trial standard demands mitigation of a risk not present at the port.

The TC agreed with the proposal to reduce how prescriptive the requirements are in terms of the methodology used to mitigate risks. This approach would allow ports more flexibility in terms of the specific actions taken to ensure the product and practices meet the requirements of the supply chain. This should also reduce the number of ‘N/A’ scores by adequately reflecting the fact that some ports are inherently low-risk in some areas.

The TC agreed that requirements should not be made so generalised as to remove the teeth of the standard, and should aim to achieve balance between meaningful and achievable requirements.

The TC agreed also that effort should also be made to ensure reducing prescriptiveness should not remove any legal requirements (where there are prescriptive).

TC agreed with proposals to reduce prescriptiveness on clauses.

7. Legal Requirements

Several ports questioned the need to include in the standard requirements that are already legally mandated and therefore checked and enforced by government bodies; however, as this area had been discussed in previous TC and OB meetings, the proposal was to retain the legal requirements

The TC agreed with the proposal to retain the legal requirements as previously these had been viewed by the TC and OB as important components.

TC agreed with proposals.

8. 24-hour Monitoring

Several trial ports noted that although ports can be active and accessible 24-hours, there is not a 24-hour administrative presence. In some situations, this means that requirements can be met during work hours but not necessarily covered at night.

The TC agreed with the proposal to allow risks to be identified through risk assessment and the implementation of mitigating measures, as appropriate to a port's specific situation. Where relevant, members were shown where clarification had been added to the proposed standard to include consideration of this issue.

TC agreed with proposal.

9. Ice Making

The trial standard includes requirements relating to the use of potable water and maintaining product temperature; however, no clauses makes specific requirements related to ice hygiene. Ice is reported to be a major potential source of contamination

The TC agreed with the proposal to add a section to the standard to ensure the risk of ice contamination is mitigated. The TC recommended communicating with EHO to develop further requirements.

TC agreed with proposal.

2. Proposed changes to the ‘significant’ clauses within the draft standard

TC members were presented with a series of significant clauses along with a proposed change. The results are summarised below.

Original clause	Proposed change	Reason	TC decision on proposed change
1.3.2.10.9 A footbath shall be installed at the first point of personnel entry into the auction/selling area.	DELETE	Trials suggest this is impractical, particularly for fishermen	Agreed
1.5.9 All staff and visitors shall complete and sign a health questionnaire on their own personal health and on the rules for personal hygiene prior to them being permitted access to the selling area.	1.5.9 All staff and visitors shall be informed of requirements relating to their own personal health and on the rules for personal hygiene prior to them being permitted access to the selling area.	Edited to take into account difficulty of enforcing questionnaires at many ports.	Agreed
1.7.4 The Applicant shall have a responsible person in attendance during catch landing/handling operations to ensure that the potential risks to the catch from the public or other associated risks such as dogs are kept to a minimum.	1.7.4 The steps and measures identified in the food protection plan as necessary to mitigate risk shall be fully implemented.	Merged security requirements (1.7.4 – 1.7.6 & 1.7.7) to reduce prescriptiveness.	Agreed. TC noted that there should be additional guidance in relation to the content required in the food protection plan. TC concluded that the plan should be reviewed and approved by the EHO.
2.1.1 The Applicant shall provide their annual performance targets as evidence that they operate in full alignment with the good practice guidance published by the Maritime and Coastguard Agency (MCA).	DELETE	Some trial ports were unfamiliar with the MCA guidance – suggest covered by other clauses	Rejected. TC noted that annual performance targets are required of all UK ports. TC concluded that this clause should not be deleted (proposal rejected, along with 2.1.2).
2.16. A fully trained first aider shall be present during every	2.16. A fully trained first aider shall be present during the	Edit to reflect trial findings.	Rejected. TC concluded that

shift that the facility is operational.	main operational hours.	Challenging for ports which are open 24/7.	first aid provision should meet the minimum legal requirements. Clause edited to reflect this
2.24 The Applicant shall have a documented policy and evidence that they are engaged with their suppliers and other users of their facility on implementing the RFPS welfare accountability criteria.	2.24 The port authority shall engage with the employers of non-relevant personnel who interact with or work at the port to ensure that they implement the minimum levels of worker welfare described in this section.	Edited to reflect changes in this section.	Agreed subject to further edits to reflect outcomes of worker welfare conversation.
4.6.2.3 Container(s) used to store ABP fish shall need to be leak-proof and shall need to be labelled as 'CATEGORY 3: not for human consumption'.	4.6.2.3 Container(s) used to store ABP fish shall be leak-proof and labelled as 'CATEGORY 3: not for human consumption'.	Edit for clarity. Can ports achieve 4.6.1 requirements?	Agreed

3.0 Further discussions.

The TC also reached the following conclusions:

- Reference to “Food Safety Management Plan” (FSMP) should be replaced by “HACCP-style plan/assessment” throughout the text.
- Guidance should clarify that a HACCP-style plan can include efforts which go beyond the HACCP requirements.
- **1.3.1.2.2** Replace “EA or water authority” with EHO.
- Reduce or remove references to ‘design’ throughout document – e.g. design of drains is difficult to change. Use term ‘maintain’.
- **1.3.2.3.3** Clarify that protecting glass could also include non-physical measures, such as keeping of a glass register.
- **4.2.2** Remove reference to the EU grading standard. Add a clause requiring that the port’s grading specifications should be publically available.
- **4.2.1** Remove reference to ‘quality’ grades. Add a clause that there must be a mechanism in place to ensure all fish on the market is of merchantable quality.
- **4.7.1** Remove clause.
- Introduce a requirement for port to have a Corporate Social Responsibility policy.

