

Responsible Fishing Ports Scheme: Small Ports Sub-committee Meeting

Venue: The Wesley, London on 15th February 2019

Present:

- Marcus Jacklin (chair) (MSJ)
- Sam Peacock RS Standards (SP)
- Kevin Quigley (KQ)
- Celia MacKenzie (CM)
- Michaela Archer (MA)
- Tony Usher (TU) – on phone from mid Agenda point 5
- Michael Ridgway (MR) – on phone, in attendance from Agenda point 3

1 Welcome and Apologies

MJ welcomed everyone to the first meeting of the Small Ports Sub-committee (SPSC).

No apologies were received – members were advised that MR would be late arriving and that TU was attending via conference phone.

MJ provided background to the Responsible Fishing Ports Scheme (RFPS) which had its origins several years ago when work started on the scheme. In developing the scheme, fishing ports were categorised into 2 main groups (large and small), the key difference being that large ports have sales or auction facilities. During early stages of the work it had become evident that the scheme needed separate standards to cover large and small ports respectively.

Members were advised that the aim of the meeting was to discuss and agree a way forward for the development of the standard for small ports.

2 SPSC Terms of reference

SP explained that a ToR is a formal requirement, despite the group being small. A draft ToR had been circulated prior to the meeting. The Key area to focus on was the objectives and key activities which align with the roles and responsibilities of the oversight technical board (OTB).

Discussion

KQ proposed that the word 'recommendation' should be added, as the purpose of this group was to recommend to the OB the way forward. SP agreed to update the ToR and add this into the main objective. **Members agreed.**

SP referred to the remainder of the ToR and explained the detail of the requirements.

KQ highlighted the need to ensure that the technical requirements of small ports were 'workable'. All agreed that the scheme needs to be achievable whilst ensuring effective standards of operation.

MA advised that the formalities of developing a ToR are to help future-proof the scheme. Members were advised that agreed ToR would be uploaded onto the RFPS webpage and be available for comment and review as the Group develops.

The Group discussed the requirement of the scheme, highlighting the importance of small ports engaging with it and whether the scheme aligned with the requirements of the rest of the supply chain. MJ explained that members of the supply chain were sympathetic to the differences between different ports and supportive of the development of different approaches to ensure small ports were not disadvantaged. Members highlighted the need for the small port scheme to reflect the very different operations, resource limitations etc. in small ports compared with operations at 'large' ports.

The Group discussed the format of future meetings. All members agreed their preference was to meet in person and that every effort should be made to attend as this process is important; however, the Group agreed that members should be allowed to dial-in, if necessary.

KQ proposed CM as Chair of the SPSC. All agreed.

After TU joined the meeting, the ToR was discussed including the proposed changes. All agreed to the proposed changes.

ACTION:

- CM to take over as Chair of the SPSC
- The revisions to the ToR were accepted by the Group. The revised version will be circulated to the Group to agree.
- The Seafish webpage will be updated with information after this meeting, including the updated ToR.

3 Small ports scoping study

MJ explained the background work that has been undertaken in scoping out the small ports. This included visits to a number of ports and responses to questionnaires. The responses covered multiple types of small ports and the levels of operation which could occur at a port.

Commonalities found during the visits included; staff numbers varied from few to none; harbour offices may or may not be present; and catch storage varied from none to simple unrefrigerated storage through to chill stores. Overall, small ports were very diverse and often complex in nature.

Discussion

Members expressed surprise at some types of ports deemed small ports. Members were referred to the 4 categories, and advised that large ports provide a 'selling' function in addition to many other operations carried out at the port.

In relation to how this may work for the scheme, members were advised that different clauses would reflect the range of operations present at the most complex ports - clauses wouldn't apply in situations where associated activities are not carried out at the port.

SP advised that the approach should be about determining clauses that were relevant to manage the perceived risk on catch handling, worker welfare, safety, catch traceability etc. Members were advised that, based on all the information gathered from the scoping exercise, a modular approach was proposed which would enable the scheme to cover any/all of those variabilities, and was discussed further under section 3.

CM explained that the information in the proposal circulated prior to the meeting was useful in explaining how the scheme would work. One area highlighted as a potential challenge was ensuring the safety of port users; for example, port users that the port itself wasn't responsible for. Members advised that ports implement measures to manage risk to people, and explained that ports are responsible to ensure the safety of port users and how that relates to liability. CM asked how the scheme would address this issue. SP explained that, at present, worker welfare is separate from health and safety. Non-port employees would be covered under a separate agreement. The health and safety requirements are covered separately, and specific requirements of each port are addressed through risk assessment.

KQ referred to the landing of fish and despatch onto lorries, which is a common activity at many small ports. KQ queried the relevance of the scheme if this activity were excluded from the scheme. SP explained the relevance of the modular approach whereby clauses around catch handling might be excluded. In essence, many clauses may not apply to simpler ports. The concern would be the definition of what 'responsible' is, and how this is perceived by the rest of the supply chain. This scheme enables flexibility within what is deemed 'responsible' - ultimately, it will relate to the facilities at each port.

In summary, in response to being questioned, all members agreed that the findings of the scoping exercise were representative of their experiences.

CM explained that this scheme will help ports ensure that users of ports will 'toe the line'. CM highlighted that it will be interesting to see how some of the clauses and requirements evolve to reflect the reality of some of the challenges experienced in operating small ports.

CM proposed that the questionnaire could be looked at to gather new and better intelligence.

ACTION:

- MJ to undertake a visit to NI coinciding with BPA annual conference on 15th October.
- MJ to circulate information to CM and KQ about the questionnaire and to consider if changes are required to the questions, for follow up with other ports
- KQ will complete the questionnaire and return to MJ.
- Once updated, CM will follow up with other ports to complete questionnaires. MJ will support CM with information on this including which ports are classed as large.

4 Small ports assessment approach proposal

SP referred to the objectives of proposed approach that was to develop an approach by which small ports would be able to achieve recognition against the RFPS. The approach should include:

- Requirements that reflect responsible port management, but which were realistically attainable for small ports;

- An assessment procedure that recognises the variety and nature of small fishing ports in the UK;
- A certification process that is sufficiently low-cost as to ensure application remains feasible for the smallest ports.

SP advised that it was important that the scheme was realistically attainable; that the assessment procedure recognises the variety and nature of small fishing ports, and that certification is small scale.

KQ asked whether the scheme should consider a cut-off point for the small scale jetties etc, as, in the context of risk, small ports were considered low risk - so should they be considered in this scheme? The group discussed the need to consider whether certain ports (types) (eg the single jetty level) should be out of scope. CM queried whether there should be a different consideration for a collective of single jetties compared with consideration of a single jetty.

Potential considerations could include importance to the supply chain; commercial fishing, scale of operation, or supply only into the commercial market. However it was considered important not disadvantage ports - access to market was important and should not be jeopardised. Members were advised that the modular approach would enable all ports to apply and that ports would have to consider individually whether it was worth applying to the scheme or not. Members agreed that considerations of the scheme should not focus too much on the small jetties and risk losing sight of small ports closer in scale to larger ports.

In outlining the key aspects of the proposed Small Ports approach, SP explained that the approach to developing the scheme for small ports should follow the key principles on which the large ports scheme has been developed. This includes an initial pre-assessment stage (desk based). This would be followed by an audit; however, only clauses relevant to activities occurring at a port would be considered. Members were advised that the proposal is to use the large ports clauses as a starting point with no new clauses being proposed initially for small ports. However, it was suggested that this might change if new clauses were required to reflect small port activities that didn't occur at large ports. There will be a need to consider each modular area and associated clauses and evaluate their applicability to small ports' characteristics.

SP outlined that each clause would be assigned to a grouping, (see below) according to the nature of the clause and the facilities that would need to be present at the port for the clause to be applicable. The groupings have been designed to reflect the activities and objects (eg buildings and staff) that can be present at a small port.

SP explained that the proposed approach would not enable any clause in the large ports standard to be changed. The key aspect would be to provide guidance (auditor guidance) for any clause that might not be completely suited to small ports. At a later date, there will be a need to ensure clarity around the interpretation of each clause. All members understood and agreed.

Members were advised that a major benefit of the current approach is the ability to combine the two standards sometime in the future. All members strongly supported this approach.

Proposed groupings were as follows, each containing appropriate clauses;

- Universal: clauses that apply to all ports.
- Internal catch handling and/or storage areas: clauses that apply only to ports that have specific types of storage (to be defined), not just a shed. This definition does not cover a sales facility.
- Market/sales: clauses that apply only to ports with sales facilities.
- Secondary handling; weighing or grading of catch. (Do these need to be differentiated from internal catch areas?)
- Staff; clauses that apply only to ports with employees/staff. This brings into question examples such as a single harbour master that oversees several ports with no other staff.
- Buildings; clauses that apply to buildings near the landing area. To be defined further.
- Vehicles; clauses that apply to port owned land vehicles.

Discussion

KQ asked about the inclusion of potable water and ice plants. Members were advised that, at present, these would be included in the 'universal' grouping (all ports), as the clauses in the large standard relate to the quality of ice and use of potable water in contact with the catch.

(TU joined on the phone at this point.)

TU asked who would decide the category of the applicant port. SP advised that the meeting was to discuss the general approach. By dividing up the large ports standard into the different groupings, we can apply the different groupings (modular approach) to the different types of small ports that exist in the UK. The certification body would decide the category of the applicant port, based on the rules and definitions provided in the detail of each standard. In response to TU's concern that small ports might be disadvantaged because they lacked specific facilities, SP advised that this would not happen as a small port would not be audited against facilities that were not present at the port.

Following the general discussion, the Group were presented with Key questions on the approach taken for the work; namely, whether they:

- agreed with the proposed approach?
- had any comments on the:
 - overall approach of working towards a unified standard; and
 - proposed groupings ?

SP explained that while there was much work to do, there was an initial need for the Group to approve the approach being proposed to develop the standard. Members were advised that further work would involve work on the specific areas of the standard; e.g., guidance, pilot audits etc.

The group agreed that the approach seemed logical and sensible, and that it was too early to go through the specifics of each clause. The group agreed that the secretariat should continue developing the groupings and associated auditor guidance for future consideration by the SPSC.

Discussion points: Following the general discussion above, members were asked to discuss several points of important consideration.

To what extent should ports be required to set rules for skippers to follow with regards to catch handling and quality, particularly where staff are not present at the port and all handling is done by the fishers and/or drivers?

KQ and CM agreed that consideration of catch handling should be included and that some requirements on this should be included within the scheme. Members acknowledged that auditing it could be a challenge. One option would be to educate the fishers that fish is food. Customers are looking for assurance on quality and the scheme should definitely cover this area. TU expressed concern about how this could be applied. MA suggested that catch handling principles could be used to advise fishers, and that the port used to provide fishers with these principles.

TU expressed concern about how anything on quality could be 'policed' by the ports. Further discussions were held on how this would relate to fishers and catch handling, and what was within the control of the fishing port.

(MR joined the meeting at this point.)

CM advised on the potential for using good practice principles, and that ports should lead by example. As part of the scheme, ports should work towards an aspirational goal of promoting and advising on quality and better catch handling.

As an example of promoting quality, SP referred to clauses from the large ports standard, whereby the requirement for catch to be covered if left out in the open would need a catch handling procedure to be implemented. Members were asked whether this would be a reasonable/appropriate requirement of small ports. TU agreed that a workable version of that would be possible; however, it would be challenging for small ports frequented by fishers that have been operating a certain way all their life. Members agreed that changes to the auditor guidance may be necessary to ensure these and other requirements were applied appropriately to small ports.

To what extent should ports be required to set rules for skippers for traceability?

All agreed same principles apply as per those for catch quality (see above); ie to educate fishers and, as a condition of using port facilities, request fishers to be legally compliant. Members were advised that changes to the auditor guidance may be required to reflect this. **Members agreed.**

How much paperwork is reasonable to ask a small port to produce? Do we need to consider different scales of paperwork requirements?

All agreed that small ports would have certain paperwork already; e.g., employee records, risk assessment etc. Members agreed that the volume of paperwork needed would be in line with core requirements and be expected to be proportionate to the scale of activities. It was noted that the volume of paperwork required for smaller ports would likely to be proportionately less than for 'large ports'; therefore, as long as the requirement is applied with the scale of the port in mind, it will be self-limiting. **Members agreed**

What level of cleaning is required for external areas?

SP advised that several clauses exist in the large ports standard around cleaning external areas with potable water. TU explained that some of his jetties and slipways don't have potable water so this would be impossible. SP explained that there could be further explanation in the guidance to provide

alternative scenarios. KQ said that some basics need to be in place when landing to a quay, ie that there should be a minimum standard that should be considered; however, that minimum is to be determined. MR advised there could be other options, such as using an empty box underneath the stack of fish-boxes, to minimise risk of contamination. This could be an option to cover a critical control point that would allow the introduction of other control measures to reduce risk of contamination. The Group agreed that with appropriate changes to the auditor guidance, these clauses would remain applicable to small ports.

Control of visitors to small ports.

SP explained that it was a challenge within the large ports scheme to control visitors in ports that have public access. Controlling visitors is included within the scope of a food safety management plan which ensures hazards are identified and risks managed.

MR advised that it could be as simple as signage or a fence around catch handling / storage areas. It would be managed at local level depending on the risk assessment. KQ said most small ports would be full public access, so all agreed it is about trying to manage the risk of contamination (see previous discussion).

SP highlighted additional clauses referring to staff and visitors entering catch handling areas; e.g., the need to wear clean outerwear. If this weren't being monitored, would it be fair to apply this and how strict should this be.

KQ explained that, most likely, fishers would handle the catch and they are unlikely to change clothes. All agreed the issue needs further consideration. MR asked at what point the requirements for handling the catch differed from those when storing the catch, and that the requirement to change into clean clothes to store catch would be extremely challenging for small ports. The requirement should relate to risk assessment. SP said it should also be careful wording around the definition of catch handling / storing. MR asked if it was about the purpose of the storage, suggesting that catch handling is a generic area to minimise contamination but not to the same extent as a storage area which should be more hygienic. The secretariat agreed to consider the separation of the 'internal areas' grouping into 'catch handling' and 'catch storage' groupings.

Are pest control requirements applicable at ports with no buildings.

SP explained that the current large ports standard requires a pest control plan and that personnel are aware of the plan.

The group agreed that this should be covered by risk assessment and proportionality to the port. TU agreed that small ports should be risk assessed and appropriate measures be taken where problems are identified. All agreed.

When are food protection policy requirements applicable?

SP advised that the current requirement is for a food protection policy and plan. MR asked if examples were available for reference. SP explained that the current CoP covers some templates which could be revisited.

Is it reasonable to apply the waste requirements from the current RFPS standard to small ports?

SP explained that the current clauses include reference to a waste management plan and waste separation, and requirements for receptacles, waste separation, recycling etc.

TU advised that waste bins are provided and that recycling bins would be abused. He suggested that each port should have its own waste management plan.

KQ highlighted difficulties with getting people to use bins, and that it was very challenging to implement recycling requirements as they can be dictated by local rules and requirements of local facilities. If fishers are to dispose of waste then we need to advise that they need to dispose of it themselves. CM asked whether it should be about what's reasonable; for example, where a local authority does not provide recycling facilities then it would be impossible to insist a port provides recycling facilities.

All agreed that ports should implement what is deemed reasonable within the requirements of the port's waste management plan.

General discussion

All agreed with the approach taken to developing the small ports standard, highlighting the need to consider the important factor of proportionality. It was agreed that this proportionality would primarily be ensured via changes to the auditor guidance, which the SPSC will review at a future meeting.

5 Next steps

MJ explained that this is the first meeting and we'll go away and review the discussions and points made. The next step will be to consider the clauses in detail. MJ then summarised the next steps, as outlined below:

- Further develop small ports approach for approval by SPSC
- Pilot tests using small ports approach
- Revise approach based on pilot outcomes
- Public consultation
- Revise approach based on consultation
- Obtain final approval from SPSC, OTB and Seafish Board
- Launch

All agreed with the next steps and expressed strong support for the goal of one standard for all ports

6 AOB

No items were raised.