

SEA Alliance online meeting on Tuesday 14 July 2020. 4.00pm – 5.30pm.

Attendees

Alex Olsen	Espersen
Ally Dingwall	Sainsburys
Amber Madley	New England Seafood
Andy Hickman	Tesco
Andy Smith	ISB Ltd
Cameron Moffat	Young's Seafood
Cate Hickey	Co-op
Clare Clifton	World Wise Foods
Dominique Gautier	Seafresh Group
Estelle Brennan	Lyons Seafoods
Joe Prosho	Morrisons
Julia Black	Lovering Foods
Karen Green	Seafish
Lara Funk	Seafish
Louise McCafferty	Joseph Robertson Ltd
Lucy Blow	New England Seafood
Mike Mitchell	Fair Seas
Nigel Edwards	Hilton Seafoods
Petra ??	Aldi
Sam Ludlow-Taylor	Waitrose
Shannon Conlin	Seafresh Group
Sophie Harwood	Buyer
Steph Davidson	Associated Seafoods
Tracy Cambridge	Thai Union
William Davies	Hilton Seafoods
SSRT presenters	
Birgitte Poulsen	Consultant
Sara McDonald	Monterey Bay Aquarium

1. Welcome and competition statement.

The competition statement was read out and it was stated that we assumed that everybody who was taking part in the meeting this afternoon was in agreement with this statement:

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.

2. Introduction by Andy Hickman, Tesco and SEA Alliance Chair.

A slide showed who the engaged organisations are, there is more interest in the group and a good mix of businesses. This meeting will focus on areas where there are key decision points for feedback. It is six months since we set out the 2020 action plan. The Steering Groups have been meeting on a monthly basis. One reflection would be to ask whether it would be beneficial to share more regularly

some of the updates from the Steering Group with a monthly update on the key areas we are working on.

There seems to be more and more activity in this arena which only adds to the complexity. We have seen significant reports looking at human rights abuses around the world; reports by Oxfam and civil society re Thailand and COVID-19; the launch of the FisheryProgress.org social policy for FIPs; the new RFVS and its move to Global Seafood Assurances and the change that entails; the GSSI/SSCI consultation launch re at sea criteria; the recent HRAS report on observers; some criticism of the MSC over its omission of a social policy; and the launch of the GSA worker voice project. *Hope you recognise all the acronyms.* As a business operating in this area this is very complex and it is very valuable that we have a group such as this to reflect on all that is going on.

Action

- Monthly update reports to all SEA Alliance participants.

SEA Alliance activities:

3. Human Rights Risk Assessment: fisheries supplying the UK market. Joe Prosho, Morrisons.

This covers international supply chains supplying the UK market. The proposal was shared in advance.

Work plan Activities:

- Section 1 – Information Gathering & Risk Assessment approaches
- Section 2 – Enhanced Due Diligence (needs alignment around risk)

Aim of the project:

- To undertake a baseline human rights risk assessment of fisheries supplying the UK market to drive further work.
- To act as a one reference point supporting companies and supply chains who do or don't already undertake their own assessments.

What we have done:

- Cascaded to SEA Alliance a full list of fisheries as defined by SFP/Ocean Disclosure Project for feedback (Q1). This looked at the scope of the fisheries.
- Reviewed work that had already been done in this area (SEA Alliance members identifying risk last year, SFP Human Rights Risk Indicator – 2016).
- Explored the possibility of contracting a third party to undertake the risk assessment – able to give it necessary time, have relevant experience, and provide an independent perspective. This would be a desk top exercise.

The SEA Alliance Steering Group has spoken with SFP and FishWise and is proposing a collaborative project in which:

- SFP undertake a one-off desk based risk assessment for supply fisheries using proxy indicators.
- Tania Woodcock leads on the assessment (five years working for Verisk Maplecroft as a risk analyst, five years working Monterey Bay and SFP).
- SFP will produce the desk-based risk analysis. FishWise will support with a review of the output and direction for future enhanced due diligence.

Timescale:

- 10 days for project taking place in August, cost circa £5,000.

Output:

- Spreadsheet including methodology, weighting and associated risks with all fisheries.
- Summary of key human rights risks across up to 10 higher risk fisheries.

There is the opportunity to engage with this – feedback by 21 July please:

- Funding (sensitive of broad scope and company specific interest).
- Methodology (to be fed back through SEA Alliance lead – Joe Prosho). This conversation has already started.

Sharing output:

- To be agreed by the SEA Alliance, could potentially publish some information.
- Companies may choose to publish risk scores as it pertains to their own fisheries.

Future:

- Use to inform and steer the development of enhanced due diligence work.

Discussion

- This will be an aggregated piece of work (not company specific) with one collective output.
- **Learning from others.** Could we learn from the FNET experience? FNET members are already paying for the development of the risk rating tool (not fisheries specific) and liaison could provide some learnings and short cuts. There is also the new SEDEX tool which covers government info on country level risk. There are some generic sources of fisheries information and we could perhaps cut a corner.
- **Detail on the metrics.** Proxy indicators are very useful and it is worth considering health and safety (which is linked to human rights); time spent at sea; working hours and rest days.
- **Publish data.** When/if/how this is published there needs to be a clear indication of the tone of what needs to come next. Needs to address mitigation. This needs to equip companies with the means to respond and create an opportunity to collaborate.
- **Fishery risk assessment.** This might overlap with other risk assessments with regards to indicators.
- **Could we use FNET country risk rating?** Could explore this relationship. Potentially feed in our data (theirs is not fishery specific) and exchange information.

Action

- If you would like to input into the methodology (e.g. weighting of different factors, reports and which material is considered) or support financially (total cost expected to be £5,000 with two companies already confirmed). **E: [Joe Prosho](#) by end of play 21 July 2020.**
- Look into options re FNET. We could potentially use FNET country risk rating and could feed our data into FNET. To explore this relationship and exchange information.

4. PAS 1550 implementation guidance and working with the NGO coalition who authored the PAS (originally published in 2017). Mike Mitchell, Fair Seas.

When the PAS was published it was seen as a useful contribution to the toolbox when dealing with IUU fishing and human rights issues, but also seen as formidable. There was perhaps the expectation that this should be/would become an auditable standard, however this was never really the intention. Recent discussion has been to look at ‘how’ we can use the PAS.

- As a result the NGOs have produced more guidance. We have welcomed the additional guidance provided by the NGOs, but note that whilst this adds detail to the document in terms of ‘why’ PAS is important, businesses were still looking for more practical guidance on ‘how’ to implement it
- The NGO coalition members understood this and have agreed to help us develop useful resources, especially with respect to:
 - A reference resource to help identify the baseline requirements and levels of compliance with RFMO rules and the Port State Measures Agreement
 - A standardised outreach/supplier engagement questionnaire for the collection of PAS relevant information from the supply chain.

- Since PAS was originally conceived there have been a lot of new initiatives that cover some of the ground that PAS covers. We were very keen as businesses to avoid duplication of effort. So far the NGOs have looked at two other systems and this is seen as very important.
- There is mutual recognition that other initiatives such as RFVS v2 and GDST are complementary to PAS
- The NGO coalition is reviewing how PAS relates to both the RFVS and the GDST
- It was suggested for instance, that a supply chain that is GDST compliant and RFVS certified should be c.80% PAS compliant. That is the kind of insight that businesses need. Pulling information out of the supply chain (especially complex ones) is a very large task. Until this can be systemised and data retrieval methods are employed the evolution of technological advances is critical. This will help to satisfy the requirements of something as complicated as PAS.

Discussion

- We would like the PAS to be useful throughout the whole seafood industry. Not just to the larger processors. This could really help small businesses.
- It was suggested for instance, that a supply chain that is GDST compliant and RFVS certified should be c.80% PAS compliant. What would be included in the missing 20%? An example could be the 20% might be national government-driven activities, such as implementing PSMA.
- Trial audits using the PAS highlighted what processors could easily record now, elements that could be done with a bit more effort and those you couldn't do. The trial audits showed a very varied response. The area where many struggled was on board the vessel (in the PAS there were questions about the employment of the skippers and recruitment etc). The level of granularity required is generally not found in existing business systems, but it could be.
- The Global Dialogue on Seafood Traceability has the potential to underpin everything. We need digital traceability systems to develop verification methods and this is underway. There is no single tool that can deliver everything we need.
- GSA worker voice project is fundamental to all of this to help develop reassurance. This is all working in parallel.

5. Dynamics around setting minimum standards at sea. Julia Black, Lovering Foods.

This highlights some of the key actions for wider SEA Alliance participants to engage with:

- **SSCI public consultation on social criteria.** Stakeholder consultation open: 1 July – 31 August 2020. The planned outcome is to provide industry access to a list of recognised 3rd part social compliance schemes. This requires an industry response to ensure it is designed for us.
- **FisheryProgress.org social policy.** Stakeholder consultation closed 30 June 2020. Fishery Progress reported initial feedback (230 responses) on 8 July. Quite divisive responses overall with some thinking it was going too far and too fast and those who felt it did not go far enough. The SEA Alliance Steering Group will engage further once further analysis is completed. We agree with the progressiveness of this but there is still a lot to be ironed out. Implementation and guidance for FIPs are very challenging elements. How FisheryProgress will deal with the transparency element of what will be raised is crucial. This can be nuanced and they need to work out the right context around transparency and protection when it comes to raising grievances.
- **MSC Certificate Holder Forced and Child Labour Policies, Practices and Measures Template.** There was a SEA Alliance call with MSC in April and dialogue is being maintained. The Steering Group had questions around verification of the content of these statements. Questions were also raised about the transition from a FIP to MSC and how this would work re the social aspects.

6. New Seafood Slavery Risk Tool. Birgitte Poulsen, Consultant and Sara McDonald, Monterey Bay Aquarium.

Providing information to business on forced labour, human trafficking and hazardous child labour in seafood.

As a pilot they have produced 19 profiles for tuna from: Colombia*, Ghana, Ecuador, France*, Indonesia, Italy*, Korea, Panama, Portugal, Maldives, Mauritius, Mexico, Senegal, Spain*, Philippines, Sri Lanka, Thailand, Venezuela and Vietnam. Some are *processing only. There is a lot of information available. It uses a comprehensive set of verifiable indicators to highlight relative risk.

This is all presented in various ways. There is an interactive world map where information is provided in downloadable profiles with filters. Simply click on a country and get: a description of base risks and factors that increase/decrease risks; an overview of the industry of a product (tropical tuna) in a country; options to compare information across countries; and the option to download full, referenced PDF versions of profiles.

There is also a further section on due diligence and how to do the right thing to do. This is targeted at commercial due diligence (decision makers), due diligence risk and control, criminal liability and further actions. And some practical examples of what you can do to mitigate the risk. The site is due to go live in September 2020 with introductory webinars planned for September.

Action

- For more information and to sign up as a beta tester E: contact@seafoodslaveryrisk.org or smcdonald@mbayaq.org

Further information

- [SSCI and GSSI Launch Public Consultation on At-Sea Operations Social Benchmarking Criteria. 1 July 2020. Deadline for responses is 31 August 2020.](#) The Consumer Goods Forum's (CGF) Sustainable Supply Chain Initiative (SSCI) and the Global Sustainable Seafood Initiative (GSSI) have launched a public consultation on their jointly developed social compliance criteria under the At-Sea Operations scope of the SSCI benchmark. The criteria, developed by industry leaders, experts and stakeholders from SSCI and GSSI, cover social and scheme management requirements specifically for third-party social compliance schemes evaluating At-Sea Operations in the seafood sector.
- [The Fishery Progress Draft Social Policy can be downloaded here](#)
- **GSA worker voice project.** If anyone would be interested in completing a survey for the GSA worker voice project mentioned by Ally Dingwall and Mike Mitchell, please E: [Karen Green](#).