

Note of Common Language Group (CLG) meeting held at Friends House, London. Thursday 2 March 2017

For the CLG minutes and meeting presentations see:

<http://www.seafish.org/responsible-sourcing/discussion-forums/the-common-language-group>

1. Welcome, introductions and apologies

Libby Woodhatch welcomed everyone to the meeting. Mike Kaiser sent his apologies “for not being with you in what looks like a very interesting meeting focused on IUU. I’m afraid that I had a clash with a Joint Nature Conservation Committee board meeting in Defra which is certainly of great importance given the Brexit related issues that will affect all Government bodies now and in the future. I look forward to seeing you all at the next CLG meeting in June, and would like to thank Libby for stepping into my role.”

Attendees

Aisla Jones	Co-op
Alma Bonilla	Joseph Robertson Ltd
Andrew Kuyk	Provision Trade Federation
Andrew Nicholson	2 Sisters Food Group
Andres Reyes-Alzate	Lovering Foods Ltd
Andy Hickman	Tesco
Andy Matchett	Coombe Fisheries Ltd
Angela Doherty	CP Foods
Anne-Marie Kats	Visfederatie
Blake Lee-Harwood	Sustainable Fisheries Partnership
Brad Hart	Co-op
Caitlin Schindler	Lovering Foods Ltd
Chiara Vitali	World Animal Protection
Chloe North	Marine Stewardship Council
Chris Brown	Asda
Chris Williams	New Economics Foundation
Christine Absil	Good Fish Foundation
Clara Obregon	Zoological Society of London
Clarus Chu	World Wildlife Fund
Clive Truman	University of Southampton
Courtney Farthing	Pew Trusts
David Jarrad	Shellfish Association of Great Britain
Donna Cawthorn	University of Salford
Estelle Brennan	Lyons Seafoods
Frances James	MacAlister Elliott & Partners Ltd
Giles Bartlett	Sealord Caistor
Graham Hind	Greenwich Forum
Graham Lott	Defra
Harriet Yates-Smith	Mindfully Wired Communications
Helen Duggan	Seafish
Huw Thomas	Pew Trusts

John Pearce
Ingrid Kelling
Ivan Bartolo
Karen Green
Katie Miller
Katie St John Glew
Liane Veitch
Libby Woodhatch
Lisa Borges
Lucy Blow
Matthew Cox
Mike Mitchell
Nick Neeld
Nicki Holmyard
Nigel Edwards
Peter Andrews
Peter Hajjieris
Peter Horn
Rajina Gurung
Rebecca Hubbard
Richard Stansfield
Rodney Anderson
Ruth Quinn
Sophie Nodzanski
Stefano Mariani
Steve Hall
Toby Middleton
Tracy Cambridge
Tristram Lewis
Walter Anzer

MRAG
International Pole & Line Foundation
Seafish
Seafish (Minutes)
Sustainable Seafood Coalition
University of Southampton
ClientEarth
Seafish (Chair)
FishFix
New England Seafood
North Atlantic (Holdings) Limited
Fair Seas
The Big Prawn Company
Offshore Shellfish Ltd
Icelandic Seachiil
British Retail Consortium
Seafish Board
Pew Trusts
Marine Conservation Society
Funding Fish
Flatfish
North Sea Marine Cluster
Chatham House
Environmental Justice Foundation
University of Salford
Avalerion Capital
Marine Stewardship Council
World Wildlife Fund
Funding Fish
FRUCOM and BFIDA

Apologies

Ally Dingwall
Andy Smith
Barry Harland
Jim Masters
Jim Portus
John Butler
Jon Harman
Laky Zervudachi
Marcus Coleman
Mel Groundsell
Mike Berthet
Mike Kaiser
Neil Auchterlonie
Nick Mynard
Ross Jolliffe
Stewart Cutchey
Tom Pickerell

Sainsbury's
Iceland Seafood Barraclough Ltd
Whitby Seafoods
Fishing into the Future
SWFPO
Oscar Mayer Group
Cleugh Maritime
Direct Seafoods
Seafish
Seafish
Global Aquaculture Alliance
Bangor University
IFFO
Marine Management Organisation
Cefas
Cefas
Seafish

2. Minutes from the last meeting held on 10 November 2016.

The final minutes were accepted as a true reflection of the meeting and have been added to the CLG web page. Attendees were asked to take note of the meeting guidelines. In the following minutes Seafish will provide a link to the various presentations given at the meeting but not summarise the whole presentation. In the main we do not attribute the comments made at the meeting. Papers were sent round and tabled covering the activities of the other Seafish groups (Aquaculture, Discards, Ethics and Skates and Rays) and a list of forthcoming seafood events. A full list can be found on the Seafish website: <http://www.seafish.org/about-seafish/news-and-events/events>

1. Product integrity – provenance and authenticity. Mike Mitchell, Fair Seas.

http://www.seafish.org/media/1681397/clg_mar2017_productauthenticity_fairseas.pdf

Mike highlighted the issues surrounding seafood fraud and how these have changed over the years. In particular: the NGO focus in North America and Europe with Greenpeace and Oceana; the widespread reporting of seafood fraud in the media (in the main species substitution); food system vulnerability which was exposed by the horsemeat crisis in 2013; academic studies reporting food chain vulnerability; and retailer and brand owner concern about upstream supply chain integrity. Seafood represents a large market in terms of the number of individual operators who are supplying the retail sector. Large businesses have skills and resources to combat food fraud internally and also have access to trade federation memberships where additional resource and support is made available. For small and medium sized enterprises this will not be the same. The risk exposure is likely to be greater where these additional resources are cost prohibitive so new resources are required to upskill businesses of all sizes, to help them identify and mitigate against their upstream risk exposures. Eleven examples of seafood fraud were presented and are detailed in a new Seafish publication [Seafood provenance and authenticity](#). This gives examples of each instance, explaining the issue and giving some ideas on mitigation. There was also mention of a new FDQ certified vocational training course being developed at Grimsby Institute of Further and Higher Education with the support of Seafish called 'Principles of Food Authenticity and Integrity' which covers upskilling the workforce to meet the food fraud challenge.

Discussion

- **Question.** From your list of eleven which would be your top three, in terms of impact? **A.** For me species substitution, species adulteration and undeclared product extension (dilution or enhanced water retention).
- **Question.** Is fresh versus frozen an issue? **A.** I have no issue between fresh and frozen. Depending on the scale and quantity, and unless we are talking about seafood supplies that are very local, freezing can actually make the product better. So it does depend on logistics and cost. A lot of seafood is frozen at sea very quickly after being caught. This issue is the pack or the point of sale needs to state correctly it is what it says it is.
- **Question.** Could this actually create opportunities with the potential to make a benefit of some of these issues i.e. this could foster diversification if one species is substituted for a more sustainable one? (Cod as an unsustainable species was very quickly disputed). **A.** This has been a call for many years to encourage consumers to diversify and eat a greater range of species, some of which may be under-utilised. This is all about illegality – the real issue is that the species must be called by its legal title.

Action: Circulate link to briefing note.

Risks to the UK seafood supply chain – Illegal, Unreported and Unregulated (IUU) fishing

2. Regulatory framework, governance and control in the UK. Graham Lott, Defra. http://www.seafish.org/media/1681379/clg_mar2017_iuu_defra.pdf

This highlighted the role of UK Government to prevent and deter IUU fishing. UK Government works as part of the EU to support the Commission's work with third countries and where appropriate supports the yellow and red card process (and green cards); it works with the UK Border agencies to support day to day operations by Port Health and the MMO; and it works with UK industry. Between 2014 and 2015 Port Health carried out at least a basic check on all imports with almost 50,000 catch certificates received (Iceland, Canada and the Maldives make up the bulk of these). From these there were 10 rejections.

3. Ocean 5 Controlling Illegal Fishing in Europe (EJF, Oceana, PEW and WWF). Overview of what is happening in the EU and coalition activities. Sophie Nodzinski, Environmental Justice Foundation.

http://www.seafish.org/media/1681382/clg_mar2017_ngocoalition_ejf.pdf

EU policy on IUU has three core components: only fisheries products validated as legal by the competent flag states can be imported; third countries failing to combat illegal fishing can face trade sanctions; and EU nationals who engage in IUU face substantial penalties. The third-country carding process is key to maintaining this as a priority. The NGO coalition has produced a number of reports that analyse progress looking at European Commission carding decisions and EU progress in the global fight against illegal fishing. A further report 'Implementation of import controls under the EU Regulation to end illegal, unreported and unregulated (IUU) fishing: A review of progress to date' will be launched at the Chatham House IUU Forum in March. This shows that the quality of reporting does vary between EU Member States and there are disparities in how the legislation is implemented. This is the last year of the coalition work in this area. The coalition is also working on PAS 1550: Exercising due diligence in establishing the legal origin of fishery/seafood products and marine ingredients – Importing and processing. The scope of the 'Code of Practice' covers traceability, human rights and IUU. The project is being managed by the British Standards Institute and it follows the BSI standard development process.

Action: Circulate links to reports.

4. Assessing the Implications of the Landing Obligation (LO) on Marine Stewardship Council (MSC) Certified Fisheries in Europe. Lisa Borges, FishFix.

http://www.seafish.org/media/1681385/clg_mar2017_lo_msc_fishfix.pdf

The Landing Obligation (LO) is gradually being introduced in the EU and the aim is to reduce unwanted catch. This report looks at the interaction of the LO with MSC fisheries. This looks ahead to 2019 and assumes weak implementation. Twenty five MSC fisheries were selected covering demersal-trawl, seine; demersal static gears - longline, gillnets; pelagic-trawl, and covering the Baltic Sea, North Sea, North and South Western Waters. This has showed strong interactions between the LO and MSC criteria (harvest strategy and compliance) and the potential for six out of the 14 demersal trawl fisheries with a high risk of failing to meet MSC criteria. Effective implementation and monitoring of the LO will be key.

Action: Circulate links to report.

5. Retailer perspective. Andy Hickman, Tesco.

http://www.seafish.org/media/1681388/clg_mar2017_retailerperspectiveiuu_tesco.pdf

Authenticity and integrity are monumentally important and the burden of responsibility falls on the retailer. There is significant brand risk if these are compromised, for example, “Horsegate” fell on a day when there were significant stories in the media, but it still grabbed the headlines. For retail customers price and quality are key purchasing drivers and legality is a basic expectation. There are generalised concerns about the future of oceans and fish stocks and selectivity is viewed as important. With regards to IUU this is the eighth year of the EU IUU Regulation and it is disappointing that we don’t yet have harmonised activity across all Member States. In the UK effective implementation of the landing obligation is a key priority and this is a key reputational issue for the UK seafood sector due to the very high public awareness and concern relating to discarding. This creates opportunities to foster more pre-competitive work on gear innovation and selectivity.

Action: Circulate link to BRC, EJF and WWF advisory note.

Discussion

Brexit

- There are a lot of issues of concern on the processing side with regards to the LO including the MSC report above, what Brexit will mean and the whole issue of legally caught fish all of which have the potential to impact on the reputation of the UK seafood industry.
- There are questions over the UK adopting EU legislation as UK legislation in the interim and how UK Government will cope with the extra requirements re controls.
- Seafood is a global supply chain and now is not the time to retreat. The issues being described today will not go away whatever happens with Brexit.
- Different sectors are being asked to respond in different ways over collaboration with EU partners during this interim period. There are currently calls for research tenders and these continue with no change. However, issues over Brexit for the catching sector and the processing sector are very different. AIPCE continues to work collaboratively as it has always done, and is doubling its efforts. However, the Advisory Councils are behaving differently. For the pelagic catching sector there is talk of the UK being asked to withdraw from meetings and forums before negotiations on quotas etc begin. For the North Western Waters the UK is still very much an active participant.

Landing obligation

- The LO has been a massive issue for the fishing sector and without more flexibility within the LO there are implications of non-compliance and illegality and worries about weakening of control and enforcement. The EU Control Regulation is under review which is also an issue.
- Monitoring is crucial to ensure the LO is being implemented but it is only really in 2017 that we can say with any evidence that the law is not being followed. However, there are opportunities to increase monitoring.
- In the EU the pelagic LO was introduced over one year ago and the demersal LO is being introduced over three years. This compares with 20 years in Norway. This illustrates it is being implemented over a short period of time. In Norway there is no monitoring at sea and very strong enforcement rules.
- Member States are required to send in reports to the Commission re implementation of the LO. There was some discussion over the role of the

Scientific, Technical and Economic Committee for Fisheries (STECF) in analysing the current system.

- **Question.** There has been a lot of talk of the challenges of Brexit but for UK fishing post Brexit could there be opportunities with the LO for the UK to introduce remote electronic monitoring and CCTV in a very proactive way? **A.** This is all on the table to be considered.

IUU

- Whatever happens with Brexit with regards to the IUU Regulation nothing is going to change our need to know there is compliance.
- **Question.** Is there a means to make EU Member States more complaint? **A.** A more standardised catch certificate would be one step with more guidance on what compliance means.

Addressing the IUU issue

6. A global perspective on IUU and evidence-based risk assessments (sustainability, legality and traceability). John Pearce, MRAG.

http://www.seafish.org/media/1681391/clg_mar2017_riskbasedassessment_mrag.pdf

IUU is a global problem with fishing losses worldwide estimated at between \$10 bn and \$23.5 bn annually, representing between 11 and 26 million tonnes. (Agnew et al. 2009). There has been movement in addressing the issues since 2009 globally with acknowledgement and engagement and new developments such as: the FAO Expert Group (2015); the Port States Measure Agreement; and further studies into the scale of the issue. In the European Union the IUU Regulation has been introduced establishing control of third party imports through catch certificate and discards control through the LO. In the United States the Seafood Import Monitoring Program has been introduced which was approved in December 2016. This is similar to the EU catch certificate program but operates on a commercial rather than state level. Pressure is being applied including: the recent increase in control in Indonesia; the EU 'carding process' (eleven countries that have had yellow or red cards now have now been given the all clear). There are still a number of weak links (flag, coastal and port) and weak links continue to be identified. Evidence based risk assessments taking into account sustainability, legality, traceability and social and ethical issues were presented as a way to exercise due diligence in assessing the risks in incoming supplies.

7. A general overview on technological solutions i.e. who is doing what? Peter Horn, Pew Trusts.

http://www.seafish.org/media/1681394/clg_mar2017_iutechnologicalsolns_pew.pdf

Technological solutions provide a means to generate data providing you know where to look, but with such a lot of information being generated it does potentially create issues of 'data deluge' and a requirement to process that data and create layers of information. There are various methods of generating data including the Automatic Identification System (AIS) short range coastal tracking system used on vessels and Vessel Monitoring Systems (VMS). There are also emerging technologies which are becoming more affordable and accessible including CubeSats (satellite technology), Infra Red (to explore the data that is available) and photo recognition, which is all about accessibility. The real change needs to be around a move from paper-based documentation to electronic data exchange. This is a crowded area with a lot of NGOs in addition to law enforcement authorities (National and Interpol), navies and coastguard, coalitions (eg: Fish-i Africa) and the seafood industry. AIS alone cannot assure compliance the data needs to be layered and interpreted and it needs to be shared. Technology is only part

of the answer we need social momentum and political will, and this is building and will hopefully drive transparency.

8. Detecting region of origin in seafood using natural stable isotope tracers. Clive Truman, University of Southampton.

http://www.seafish.org/media/1681400/clg_mar2017_isotapetracers_univofsoton.pdf

Research has focussed on using natural stable isotope tracers as a way of detecting authenticity and origin of seafood. This methodology has predominantly been used for animals and mammals and has not been used very much in the marine world. A North Sea case study for geographic assignment has used jellyfish as a reference organism. This science could be used to show where cod comes from i.e. Iceland, the North Sea or the Barents Sea. Researchers are looking for ideas on where to focus and what would be of most use to industry.

Discussion

- **Question.** Can this be used to detect the origin of tuna? **A.** We have not looked at tuna and think it would be very difficult.
- **Question.** Could this be used for aquaculture species and potentially show whether warm water prawns come from Thailand or Indonesia? **A.** The more coastal the more difficult it is. We have looked at salmon farms and this showed we would need directed sampling and a baseline for a confident assessment. There are also considerations as to where the fish feed came from.

Addressing seafood fraud

9. Industry collaboration to address tuna fraud. Ivan Bartolo, Seafish and Lucy Blow, New England Seafood.

http://www.seafish.org/media/1681403/clg_mar2017_industrycollabontunafraud_seafish.pdf

This centres on the use of nitrate treatment for tuna. Low quality tuna is brown or will turn to brown once defrosted however, nitrification changes a myoglobin component to turn the initial brown colour to red and to fix this new colour. This red colour to the tuna creates a perception of higher value for consumers who are misled on the quality however the antioxidants (ascorbic acid, erythorbate or Vit C) are always used and abused to complete the reaction. This issue was raised by New England Seafood who brought together a group of processors who created a dossier on the illegal practice of treating tuna with vegetable extracts which was presented to the EU in December 2016. This posed the question: *Does the Commission agree that this vegetable extract is not a 'flavour' if it does not impart any odour or taste? And should not be permitted as flavouring if it poses a safety risk and misleads the consumer?* As a result the EU has confirmed by letter to EU businesses that transforming the colour of tuna by any means is fraud and that there needs to be consistency between Member States on interpretation of the regulation. However, there are still questions over whether the practice has been completely stamped out. There are some lessons to be learnt in how to bring about change like this: more than one Member State needs to be involved but it does not need to be an official organisation; the businesses must have tried to resolve the issue with their national competent authorities; the fraud and financial loss to the consumer should be significant (in this case potentially €20 million); there is a need to identify where there are non-compliances with the EU regulation; and it is important to target the fraudulent activity not the method.

10. SNAPTRACE Fostering more transparent and sustainable global seafood markets, using the snappers (Lutjanidae) as a model. Donna Cawthorn, University of Salford.

http://www.seafish.org/media/1681406/clg_mar2017_snaptrace_univofsalford.pdf

This highlighted the three components of the SNAP-TRACE project which focusses on 'snappers' (Lutjanidae family) as model:

- SNAP-trade – the first global trade data analysis for snappers to show drivers and dynamics of supply and demand and discrepancies in trading patterns.
- SNAP-species – with DNA barcoding showing the diversity of species sold as 'snapper' (true/false) on global markets.
- SNAP-pop – showing the main sources of premium snappers on global markets with baseline samples from throughout the known distribution range, nuclear markers (SNPs) to differentiate baseline population/stocks; and geographic assignment of market samples.

With regards to trade and species this has produced the first global trade data analysis for snappers for 2006–2013 and has established primary sources of snapper supply and demand. It has also shown up existing loopholes that promote trade data discrepancies that could facilitate illicit harvesting and trade and identified 'key nodes' to enhance data reporting in support of more effective traceability. There are discrepancies in mirror data, which could be for legitimate and illegitimate reasons such as time lags between exports and imports, human errors, differences between commodity classification partner country attribution, transshipment/re-export, document falsification and intentional commodity or direction misclassification. This has highlighted an overall lack of taxonomic granularity and use of vague generic names in trade records and market labels (and this is one of most insidious impediments to snapper traceability) and the need to strengthen HS tariff codes and labelling requirements.

11. Date of next meeting

Mike Kaiser suggested at the previous CLG, on behalf of the Science Advisory Group, the idea of a CLG that focuses entirely on cutting edge scientific advances in different areas of interest to the seafood industry. The areas could include fisheries, aquaculture, seafood integrity, consumer behaviour, processing technology and capture technology - so very broad cutting across the entire remit of the CLG. This is being taken forward to create an agenda for the next CLG meeting which will be on Thursday 22 June 2017 at Friends House, London.