Notes on the Responsible Fishing Port and Harbour Standard's Technical Committee meeting (inaugural) Friend's House, London 19/04/16

1.0 Welcome, introduction and apologies

Jonathan Shepherd welcomed everybody to the meeting.

Attendees	Organisation	Sector
Jonathan Shepherd	Seafish Board	Chair
Marcus Jacklin	Seafish	
Mike Platt	RS Standards Ltd.	Consultant
Richard Lawton	Eyemouth HM	Port
Dave Bartlett	Brixham HM	Port
David-John McRobbie	Scottish Fish Agent (Don Fishing Co.)	Agent
John Foreman	Peterhead HM	Port
Matt	Brixham Fish Agent	Agent
Nick Kightley	ETI	Welfare
Laky Zervudachi	Direct Seafoods	Retail
Riyaz Dhalla	Waitrose – Brand Policy Manager	Retail
Steve Norton	Grimsby Fish Merchants Association (GFMA)	Processing
		NGO
Alison Roel	MSC	NGO
Simon Potton	Seafish	
Gus Caslake	Seafish	
Jess Sparks	Seafish	
Apologies		
Hannah Mcintrye	M&S	Retail
Andy Hickman	Tesco	Retail
Rob Parsons	Newlyn HM	Port
Katie Miller	Client Earth	

2.0 Mission for the day

The purpose of the meeting was to inform potential members of the Responsible Fishing Port/Harbour Standard (RFPHS) Technical Committee about the initiative to develop a RFPH Standard with a view to them becoming members of the Technical Committee (TC), and discuss the draft modular discussion paper.

The first part of the meeting provided background context to the need for the standard, and the second part involved discussing the detail of the draft module discussion paper that was circulated to the Group in advance of the meeting.

3.0 TC membership

The sectoral composition of the delegates was considered representative of the supply UK seafood chain, providing a robust foundation for discussion and agreement; however, future consultations on the further development of the RFPHS code of practice will require more representation from the following regulatory organisations, Marine Scotland, MMO and EHOs.

4.0 General areas of discussion

4.1 Agreement over modules. Members agreed with all modules, and although it was suggested that product authenticity needed further consideration, it was proposed that adequate controls on traceability should reduce risk of mislabelling at the primary production stage.

4.2 Ports to be included

There was considerable discussion over which establishment (ports/harbours) the code of practice (COP) should refer to. It was noted that fishermen are responsible for product up to the first point of sale but they tend to delegate this task to an agent/selling company who are responsible for selling their catch to the supply chain.

There was discussion about the possibility of categorising ports based in activities carried out: landing quay with no storage facilities; landing quay with storage; landing quay, storage and sale; and landing quay, storage and auction.

It was decided for the 1st and 2nd category that the catch is still in the responsibility of the fisher so would be covered by the RFS standard. The 3rd and 4th categories would be covered by this code of practice and as such could be certified to the RFPHS as there are organisations responsible and can be held accountable for the food safety, health and safety and staff welfare standards adopted in these categories of port. In addition, in the first two categories it is the fisher's obligation under the RFS standard to risk assess how they get on and off their vessel safely.

There was discussion about how to address Pelagic ports (eg Scotland) that have no sale on market and sell direct to contract sales, and whether shellfish landing sites should be included.

Possible Group certification of larger administrative ports with registered landing sites was discussed at length and it was decided that it mightbe a good opportunity to categorise each type of port /harbour.

4.3 Unit of certification

There was much discussion over the 'unit of certification' as it was recognised that this could require the cooperation of those involves in port operations eg market authorities, fish-agents, lumpers, port workers, and possibly transport operators accessing the port. Securing the agreement of those required for a 'collective approach' was acknowledged as difficult and complex.

A unit of certification that incorporated these groups was discussed and considered a possible approach. As such, the port plus the agent would be a possible unit of certification.

5.0 RFPHS discussion document

The following part of the meeting focused on the RFPHS discussion document to discuss and agree whether the elements proposed should be included in the code of practice. The following sections refer to specific modular components discussed, as a lack of time prevented full discussion of all the modules detailed within the discussion document.

5.1 Food protection (Module 4):
It was agreed that seafood product needs to be protected from malicious damage, and that the simplest approach would be through the process of risk assessment. In areas that allow open access to the public, an acceptable approach would be to nominate a 'responsible person' to monitor public movements to minimise risk of malicious contamination. The potential utility of Threat Assessment and Critical Control Points (TACCP) was proposed as a mitigation control measure, which would require training and implementation of mitigating measures through risk assessment.

The TC agreed that a food security policy statement was needed and should be a requirement within the code of practice

Food safety. As a minimum, it was agreed that product should be stored near to the temperature of melting ice to minimise product spoilage, and that product should be 'isolated' to prevent contamination (eg dust, bird faeces or ingress of foreign objects).This could be through the use of insulated boxes or storage units.

Premises designated as 'approved food establishments' (eg auction ports) are required to have HACCP due to perceived higher risk to food safety. Premises presenting a lower risk can be designated 'registered food establishments' – these premise do not require HACCP but are expected to have in place a safety plan based on HACCP principles. Further discussion with regulatory authorities

will be required to determine how this will be enforced, communicated and monitored.

It was proposed that a port should have a clearly defined food safety management plan that should be based on HACCP principles and risk assessments. The level this will be based on will need to be discussed with the EHO to ensure that all the requirements of the code of practice, as minimum, meet legal requirements and, as this standard is to try and enhance port operations, even exceed. Suggestion was made to look at Brixham and Peterhead requirements to see how they compare?

5.2 Grading and catch handling (Module 4.2)

Size Grading. Size grading in Scotland is usually carried out on vessels, often to customer requirements; whereas within England, grading is usually carried out ashore. Legislation advises that grading of fish to EU standards must be provided if size grading is not undertaken at sea.

The supply chain highlighted the need for grading and favoured standardisation around EU grades but accepted need for bespoke grading, based often on customer preferences. Some ports (eg south-east, Grimsby and north-east) provide bespoke grading based on customer preferences

Members proposed that within the code of practice (COP), grading should be to EU grades or accepted customer standards. The suggestion was made to ask ports that grade to their own system to identify how their grades compare with the EU grades to give greater transparency to the buyers and the supply chain

The possibility of 'discards' arising from Landing Obligation bypassing the market was highlighted as a significant issue that the standard would need to address.

TC agreed that only size grading should be considered and not quality grading.

Catch handling. Direct labelling of individual plastic boxes was rejected in favour of labelling a 'batch'. The legality of this option would need to be checked, especially in context of batches being split and sent to different destinations.

5.3 Quality / temp control (module 4.3)

TC agreed that focus should be on maintaining product quality, and that product should be kept near to the temp of melting ice (legal requirement) to minimise loss of quality. TC agreed that fish coming into a selling/auction port, if transported into these facilities, should also be covered by requirements designed to maintain the quality of the catch; as a minimum, fish must be transported in insulated containers.

It was proposed that port should have a clearly defined food quality management plan.

5.4 Welfare (module 2.3)

TC agreed that a port should have a written policy on fair operating practice. Members acknowledged the need for casual labour requirements, the variable nature of the work (variable hours and timings), and the risk of engaging vulnerable personnel (illegal, migrant, sleeping rough). It was proposed that risk assessment methodology would be a suitable approach, and that the Seafish ethical working template could be used as basis.

5.5 Training

It was agreed that port should have an organisational structure to define roles and responsibilities, and that personnel should be trained adequately. It was suggested that all areas covered by the standard should be underpinned by training. A range of areas were suggested for consideration; eg

- food quality and safety assessment
- cleaning schedules (COSCH), manual handling, PPE training
- labelling and traceability arrangements for the intake of fish/shellfish
- the handling methods that maintain the condition of fish/shellfish
- how to recognise fish/shellfish species by size and quality
- dispose of waste according to specified procedures
- how to move and handle materials safely
- use of manual handling equipment
- wearing the appropriate personal protective equipment
- how to contribute to waste minimisation and handling
- how personal hygiene and behaviour affect food safety
- cleaning and maintenance of the environment and equipment, and their impact on food safety
- main type of pests and infestations and how they occur
- how to prevent and recognise a pest infestation
- how to contribute to HACCP and food safety systems
- How to maintain personal hygiene
- How to contribute to health and safety of self and others
- Team working
- Basic fishing methods

5.6 Traceability and labelling

Members agreed the need to have in place a system that ensures landed seafood can be traced according to legislative requirements, and agreed with the details provided in the discussion document. In addition, the need for fraud mitigation measures was highlighted, in context of dealing with undersized fish arising from the Landing Obligation. Reference was made to the FSA Food Crime Unit

findings of fish fraud, but it was suggested that a robust traceability system should minimise scope for fraudulent activity, especially in context of involvement with primary production (whole fish).

Next steps

TC members are requested to return to Marcus Jacklin, by 10th May, the summary document annotated with their comments in light of discussions held at initial meeting. A modified version of the summary document containing all comments will   be circulated for further discussion at a further meeting of the Technical Committee, planned to be scheduled early June 2016.