

<b>Notes on the Responsible Fishing Ports Scheme (RFPS)- Technical Committee Meeting at Friend's House, London</b>	
<b>Date:</b>	24 <sup>th</sup> January 2017
<b>Attendees:</b>	Jonathan Shepherd (Seafish Board)- Chair Sam Peacock (RS Standards) - Consultant Marcus Jacklin (Seafish) - Programme Manager Mike Platt (MSC) Riyaz Dhalla (Waitrose) Matt Bailey (Brixham Trawler Agents) Dave Bartlett (Brixham HM) Dave John McRobbie (Don Fishing - Scotland)) Pete Bromley (Sutton Harbour) Laky Zervudachi (Direct Seafoods) Jess Sparks (Seafish) Hannah Fawcett (Seafish) Michaela Archer (Seafish)
<b>Apologies:</b>	Rob Parsons (Newlyn Fish Market) Mike Berthet GAA (M&J Seafoods) Martyn Boyers (Grimsby Port/ Chair of British Ports Association Fishing Ports Group BPAFPG) Nick Kightley (Ethical Trading Initiative) Steve Norton (Grimsby Fish Merchants Association) John Forman (Peterhead HM) Andy Hickman (Tesco) Hannah Macintyre (M&S) Katie Miller (Client Earth) Leah Buckley (MSC)

### **Key discussion points**

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

The chairman welcomed attending members and introduced Sam Peacock (RS Standards) who has taken over from Mike Platt in working with Seafish on developing the Responsible Fishing Ports Scheme. He summarised the purpose of the meeting, which was to review the draft standard with a view to approving a 'working draft' to take forward to pilot audits, subject to achieving agreement over a number of key issues and potential inclusions / exclusions.

It was emphasised that an approved 'working draft' of the standard would be an initial version (working draft 1) that the TC were comfortable moving forward with. It was considered likely that

content might change following the pilot audits and formal public consultation planned next financial year, which would result in a 'working draft 2'.

This meeting focused primarily on the changes to clauses within the standard, made as a result of TC feedback and port site-visits made since the last meeting, in particular those clauses added or removed, and also on the need for agreement on key considerations. It was agreed that details about format (layout, numbering etc.) and typos would be dealt with at a later date. It was emphasised that the content within the CoP would not be examined in detail and that the document required further work; any feedback provided was to focus only on more serious concerns.

The meeting was split into two main parts; the first discussed the process by which we arrived at the document presented for discussion, the second part considered specific clauses for inclusion and exclusion.

## **2. Development of latest draft of standard.**

The main steps leading to the development of the latest draft were outlined; they included the following activities:

- Inclusion of comments from feedback received via online portal (Knowfish)
- Inclusion of comments submitted independently (email.)
- Developmental pilot audit at Brixham Market. The findings indicated some synergy with comments from Knowfish and some variations. Feedback from the visit was considered useful and estimated costs of the proposed assessment were considered by the port to be affordable; the use of a memorandum of understanding (MoU) between participants in part was considered particularly useful (discussed later). Some clauses were considered achievable whilst others were not. Discussions highlighted the need for port user groups to work together.
- Port study tours in NE Scotland (Peterhead and Fraserbrough) and Shetland (Lerwick and Scalloway). Feedback from visits was considered useful. Many issues raised were similar to those raised during the Brixham visit. Additional areas included issues with non-complying fish agents if consensus agreement was needed between several partners. Shetland stakeholders were supportive but wanted to review a later version of standard to be able to provide collective feedback. A development organization, Shetland Seafood Quality Control (SSQC), is drawing up a scheme similar to the traceability and care of catch modules contained within the RFPS standard, with a view to introducing better practices during the redevelopment of the main fishing ports (Lerwick and Scalloway).

## **3. Proposed changes to the clauses within the draft standard**

In context of changes to the standard, feedback was reviewed and fell into two main types;

- proposed changes that included some additions and other relatively minor revisions; and

- concern about some clauses, which some ports claimed might cause issues in terms of compliance. (It was suggested that these should be retained but reviewed after pilot studies, based on findings. **TC agreed with the approach that these clauses should be retained for the purposes of the pilot audits and reviewed afterwards.**)

**3.1 Additions.** The additions comprised areas not included in previous drafts of the standard and were proposed based on feedback received and port site visits.

- Memorandum of understanding (MOU). It was suggested that prior to any application to be certified, the client group should have entered into an agreement (MOU). This MOU should cover a range of points, including details of their agreement to work together and identifying the organization responsible for each clause. The standard version of this MOU would be developed in collaboration with the TC. **TC supported the use of a MoU.**
- The creation of an ‘up-front’ tick-box detailing requirements that need to be in place prior to an application; in essence part of eligibility to apply. This would be developed in collaboration with the TC and could include areas such as environmental emissions permits, compliance with port safety requirements and workers’ rights. **TC supported the use of a pre-application check-list.**
- The use of cleaning chemicals should be simplified to align with approvals elsewhere (eg via Marine Management Organisation and Environmental Health), rather than detailing a prescribed list. The need to check the national context was highlighted, as the situation in Scotland was thought to be different. **TC agreed with this approach. Brixham port agreed to obtain lists from MMO and EHO and supply them to Seafish.**
- The requirement for fish storage areas to be closed off when not in use was highlighted, along with the need to modify wording to specify the “closing of doors” rather than the “ability to close doors”. **TC agreed with this addition.**
- The need for dock areas to be equipped with life rings and adequate lighting was highlighted. **TC agreed with this addition.**
- Species representing high risk of bio-toxin contamination should not be placed on the market. This addition was proposed by Environmental Health. **TC agreed with this addition.**

### 3.2 Inclusion / Exclusion

- Concern had been raised about the inclusion of clauses relating to active mechanical ventilation in context of the adequacy of natural ventilation and cleaning scheduled preventing the formation of condensation and mould. **TC agreed to omit clauses on ventilation**
- Personal hygiene. Concern was raised in the context of challenges associated with managing visitors to ports, and the issuing of health checks was considered difficult. Challenges in Plymouth included the right of public access. Ports considered food safety risks to be lower at ports compared with subsequent stages of supply chain.

However, health checks are required in other parts of the supply chain, usually using a self-declaration form that doesn't require medicals etc. Brixham has a sign-in procedure that includes reference to 'being fit', which could be complemented with a sign(s) advising visitors not to enter if they are 'ill'.

In considering supply chain requirements, the ideal would be for individuals to sign a self-declaration form. In short-term, the completion of a signing-in book referring to medical issues was considered sensible. The supply chain considered there should be no compromise in considering fish selling areas, and ports were comfortable if requirements applied only during 'periods of sale.' The group also agreed the need to install appropriate signage guiding visitors to make the self-declaration.

These clauses had been taken out in previous drafts of the standard; however, Environmental Health had advised subsequently that these requirements were needed for legal compliance.

**TC agreed to retain clauses referring to personal hygiene.**

- Vehicle security (1.7.7). Concern was raised about malicious damage whilst product was held on vehicular transport. There was agreement to retain this clause if wording were modified to require product to be held under 'managed' conditions. **TC agreed to retain clauses referring to vehicle security.**
- **IUU (2.2.1).** The question was posed whether the IUU clauses were sufficient, as the issue is not just about IUU but also about certified products and the landing obligations. It was emphasized that responsibility lies with the MMO and FSA, and there was risk of duplication. There was agreement that this section should be retained, but it was questionable whether training is required for ports' 'staff' as it is out-with their immediate responsibility; it is covered by the EHO and MMO. The group agreed that the traceability section of standard addressed other concerns about proof of origin. **TC agreed to retain current wording of the clause(s).**

- Hard hats were not considered necessary, as Personal Protective Equipment should be appropriate to work and level of risk and would be covered under Health and safety considerations. **TC agreed to remove clause referring to use of hard hats.**
- Waste seafood (3.6.3). Concern was expressed about need for 10 metre spacing between fish waste and fish products. TC agreed to retain clause if requirement was for no contamination, eg through physical separation' **.TC agreed to retain clause, if reworded.**
- Environmental controls. (3.9.1). **TC agreed to remove section on environmental controls and include these requirements in the pre-application process.**
- Energy consumption. (3.10.1). There was concern about the requirement not to increase energy consumption; eg, due to potential need to expand premises or require additional equipment. **TC agreed to remove this clause.**
- Large Fish. The requirement to lay out large fish on pallets to prevent bending was thought inappropriate due to their high value and low risk of this happening. **TC agreed to remove this clause**
- Toxins harmful to Human Health (4.7.1 – 4.7.3). The TC highlighted the need to include common names and that the bio-toxin clauses apply only to scallops being sold to approved processors (who are complying with legal requirements for scallop processing and end product testing). The availability of information on Food Standard Agency websites was highlighted, and Brixham port agreed to provide suitable wording for clause 4.7.3. **TC agreed to retain this clause subject to revised wording.**
- Vehicle standards (1.3.2.11.3). Discussion centered around the need to minimize contamination of catch transported to port in vehicles. In respect of Threat Analysis Critical Control Points (TACCP), reference was made to BSI guidance and TACCP requirements needed under other standards (SALSA and BRC). **TC agreed to retain this clause.**
- Casual labour training (2.8, 2.8.1 – 2.8.5). Concern had been raised about 'casual labour' not being the responsibility of the port and training requirements being overly onerous; however, the TC agreed that casual labour needed suitable training, as detailed in the clause. **TC agreed to retain these clauses.**
- Waste seafood storage (3.6.1). It was highlighted that use of lidded containers was not common practice in Scotland; however, the **TC agreed to retain the clause and review after pilot audit.**

- Liquid waste (clause 3.8.1) had caused concern in context of waste liquids entering harbour, especially from pelagic vessels. TC agreed to exclude vessel discharges from the scope of the standard and that clarification from the appropriate authority (Environment Agency or equivalent) was required for other activities (eg disposal waste water from port premises). **Seafish agreed to seek clarification.**
  
- **General Considerations**
  - Scope of Standard. Discussions centered around which organisations should be included within Port Client Group (PCG) which, as a minimum, must include the Port Authorities and Fish Selling Agents.
    - The TC agreed that independent third parties (eg. processors) who have their own business are outside of scope of being in the PCG, as they follow other rules and standards.
    - TC agreed with the port concessions clauses. Ports can only cover any work within their premises, i.e. work in/on the market would be covered by the Standard and our Code of Practice.
    - TC agreed that ‘associated operators’ (eg lumpers, graders, fish handlers) should be within scope (ie part of the PCG), subject to the areas that the port can influence.
    - TC agreed that if one party/potential member of the PCG didn’t want to participate, then pressure from the others and supply chain could be used to ‘force’ their hand.
  
- **Other Points**
  - The idea of ‘earned recognition’ was highlighted as an initiative mentioned previously. **The TC supported pursuing this initiative.**

**ACTION– this will be investigated further, following pilot audits, and presented to Defra / MMO to take this idea forward.**
  - The reprocessing of fishing nets and recycling was highlighted from an environmental context as there was no specific reference in the standard. The group discussed that this was part of an aspirational module in earlier meetings and agreed to review inclusion at a later date. It was highlighted that a brief mention was included in the CoP. The group was advised that net recycling is difficult and very expensive. It was agreed to review information in the CoP.
  - The TC agreed that the Code of practice required further work.

#### **4.0 Next Steps**

The next steps to progress the standard were outlined, as follows

- Issue revised standard (working draft) to TC for final 'signoff'
- Circulate working draft more widely to British Ports Association Fishing Ports Group (BPAFPG) and stakeholder contacts in Shetland.
- Engage certification body (CB) to carry out pilot audits
- Carry out Public Consultation to develop final working draft of the Standard
- Progress applicant port(s) through application process

#### **5.0 Conclusions**

- TC approved the draft standard, subject to discussions and agreed modifications, as a working draft to move forward to pilot audit stage.