RESPONSIBLE FISHING PORTS SCHEME
Code of Practice

July 2018
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Introduction to the Responsible Fishing Ports Scheme

Background Information

The Responsible Fishing Ports Scheme (RFPS) is a voluntary programme to certify responsible food safety and good operational practices within fishing ports and harbours. The scheme is audited independently to demonstrate that a port/harbour and those organisations operating within it are following best practice in five core areas: Food Safety/Structural Integrity, Working Environment and Welfare, Care for the Environment, Care of the Catch and Seafood Traceability. The key objective of the RFPS is:

“The Responsible Fishing Ports Scheme (Standard) programme shall promote and encourage responsible operating practices within UK fishing ports and harbours to give greater assurance and transparency to buyers and users of seafood sold through UK fishing ports.”

The RFPS comprises standards which are underpinned by this Code of Practice (CoP). For more information about the scheme, see Responsible Fishing Ports Scheme.

About this Code of Practice

Purpose

This industry-developed Code of Practice provides guidance on what is considered to be good operational practice, in order to help fishing ports improve their operational performance and provide assurances to the supply chain. The aim of the guidance is to help fishing ports minimise risks associated with their activities. The guidance detailed is considered to be current ‘good practice’; however, the CoP is working towards describing ‘best practice’ and will be updated in line with future developments.

Development

The development of this CoP was undertaken by an Oversight Board (OB) who provided strategic guidance on its structure and content and a Technical Committee (TC) made up of sector-specific industry experts who developed the technical details, see Appendix II. The guidance has been reviewed by additional stakeholder technical experts in areas of food safety and regulation, see Appendix II.

Scope

This CoP contains five core areas agreed and chosen by OB and TC groups because they complement other industry standards, such as the Responsible Fishing Scheme (RFS) and other recognised on-shore food safety and chain-of-custody standards. The core areas are laid out in the following modular format:

<table>
<thead>
<tr>
<th>Core Area</th>
<th>Aim</th>
<th>Criteria</th>
</tr>
</thead>
<tbody>
<tr>
<td>Module 1 – Food safety/Structural Integrity</td>
<td>Promote food safety and mitigate contamination risks.</td>
<td>• Hygiene levels – internal and external</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Structural Condition - internal and external</td>
</tr>
</tbody>
</table>
Module 2 – Port and the Working Environment

| Provide a safe working environment through enhanced operating and welfare practices and provisions. | Food protection - site security, protection from malicious damage, and extraneous factors (e.g. dog fouling) | Due Diligence and Compliance with Legislation, Improve Skills and Knowledge, Training Provision, Health and safety, and welfare of port operatives (welfare) |

Module 3 – Care of Environment

| Promote and encourage a positive approach to the protection of the environment. | Waste management, Recycling, Environmental controls |

Module 4 – Care of the catch; Fish is Food

| Promote and maintain food protection. | Grading, Quality Maintenance - temp control (Ice, chilled), Temperature control |

Module 5 – Traceability

| Provide provenance for all the seafood handled. | Traceability systems in place |

**Applicability**

Not all the guidance detailed within the CoP will apply to all types of fishing ports due to their diverse nature in terms of activities carried out. In developing RFPS, four categories (levels) of port have been defined around the UK.

| Small Port | Level 1 | Fishing ports that are registered with the local authority and only have facilities such as a quay to allow fishers to land their catch. |
| Large Port | Level 2 | Fishing ports that are registered with the local authority have facilities such as a quay to allow fishers to land their catch and facilities to store the catch. |
|            | Level 3 | Fishing ports that are registered with the local authority have facilities such as a quay to allow fishers to land their catch, have facilities to store the catch and conduct sales directly to the supply chain. |
|            | Level 4 | Fishing ports that are registered with the local authority have facilities such as a quay to allow fishers to land their catch, have facilities to store the catch and conduct sales by auction (and direct sales) to the supply chain. |

Due to their fewer facilities and simpler operations, less of the guidance will apply to small ports.
Module 1 – Food Safety (Structural Integrity)

1.1 Introduction
The aim of this module is to promote food safety and mitigate food contamination risks.

Everyone who handles food has a responsibility to ensure it is safe to eat. As a port operator, it is essential to care for the catch to maintain its quality and food safety as it progresses from the fishing vessel through the port processes and into the supply chain. Although fish is generally considered to be a low-risk product, high standards of food safety are important to provide safe food and maintain public confidence in fish being safe and wholesome.

This CoP module provides useful and practical introduction to the principles of food safety, which will help ensure that you keep the catch safe and take responsibility for reception, storage and selling of the catch while under your control.

Within this module, the following terminology has been observed:
- ‘shall’ or ‘must’ designate current legal requirements
- ‘need’ designates ‘legal requirements’ inferred by legislation; and
- Additional good practice is designated by ‘should’ or ‘may’

Legislation
The General Food Law Regulation (EC) 178/2002 is directly applicable EU legislation and provides the general principles of food safety which include the requirement on food businesses to place safe food on the market, for traceability of food, for presentation of food, for the withdrawal or recall of unsafe food placed on the market and that food and feed imported into, and exported from, the EU shall comply with food law.

The Food Safety Act 1990 (as amended) provides the framework for all food legislation in England, Scotland and Wales – similar legislation applies in Northern Ireland.

In England, The Food Safety and Hygiene (England) Regulations 2013 (as amended) provide for the enforcement (including imposing penalties) of certain provisions of Regulation (EC) 178/2002. These Regulations also provide for the execution and enforcement of the EU Hygiene Regulations that establish hygiene requirements for the landing, inspection, storage and transport of fish ashore. The equivalent of these regulations in Scotland is The Food Hygiene (Scotland) Regulations 2005 (as amended). In Northern Ireland they are; The Food Hygiene (Northern Ireland) Regulations 2006 (as amended) and in Wales; The Food Hygiene (Wales) Regulations 2006 (as amended).

The regulations referred to in paragraph above are:—
- Regulation (EC) No. 852/2004 on the hygiene of foodstuffs
- Regulation (EC) No. 853/2004 laying down specific hygiene rules for food of animal origin
In Scotland and Wales, The General Food Regulations 2004 (as amended) provides for the enforcement (including imposing penalties) of certain provisions of Regulation (EC) 178/2002 and amended the Food Safety Act 1990 to bring it in line with Regulation (EC) 178/2002. Similar legislation applies in Northern Ireland. These regulations do not implement the EU Hygiene regulations but instead focus on the 178/2002 regulations.


**Food safety hazards**

In terms of food safety, food hazards are anything that could cause harm to the person consuming the food; they are usually categorised into four types as follows:

<table>
<thead>
<tr>
<th>Physical hazards</th>
<th>e.g. glass, metal, wood etc. in the food. Physical hazards can cause choking or serious injury.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chemical hazards</td>
<td>e.g. cleaning chemicals, oil, diesel, pesticides, biotoxins (e.g. from scallops). Chemicals do not always make food taste unpleasant.</td>
</tr>
<tr>
<td>Biological hazards</td>
<td>e.g. bacteria, viruses and moulds, which are the most common forms of biological contamination.</td>
</tr>
<tr>
<td>Allergens</td>
<td>e.g. some people are allergic to shellfish, peanuts, and dairy products.</td>
</tr>
</tbody>
</table>

In the context of ports, areas of potential risk in relation to food safety include:
- Site location, and the condition and hygiene of structures, personnel and equipment;
- Handling operations during unloading, storage, grading and selling;
- Pests and waste food;
- Chemicals and temperature control.

**Food safety management**

As part of a food safety management system to ensure safe food, a port **must** to have in place a HACCP style food safety management plan. The plan should be specific to the port’s premises and appropriate to the nature, scope and volume of the production, to allow full compliance with the RFPS Standard’s requirements and to meet or even surpass current statutory legislation. The HACCP style plan should be approved by the local Environmental Health Authority or equivalent organisation.

HACCP style plans shall be based on the Hazard Analysis Critical Control Point (HACCP) principles (unless the competent authority deems an alternative approach to HACCP to be more appropriate) and would cover all of the port/harbour physical structures involved; the systems they operate or all the processes and procedures in place; and the responsibilities of personnel and users of the market (which would need to be established). Premises approved (by Environmental health) must have in place HACCP type plans based on the whole system (7 steps), whereas registered premises (premises that are not approved) are required to have in place a system based on the first 5 steps of HACCP (excluding the recording/verification steps 6/7). An example of how to produce a generic HACCP plan is provided in Appendix 1A.
It should be emphasised that areas of risk and complexity of food safety plans will differ for each category of port depending on the types of activities carried out, see table below. For example, a level 1 premises presents least scope for food safety being compromised (i.e. only landing fish) whereas safety considerations will be more numerous for level 3 or 4 premises that land, store, handle and sell fish.

<table>
<thead>
<tr>
<th>Food safety considerations</th>
<th>Category of Port</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Level 1</td>
</tr>
<tr>
<td>External - Landing area</td>
<td>F</td>
</tr>
<tr>
<td>Storage areas (floors, walls, etc)</td>
<td>F</td>
</tr>
<tr>
<td>Handling areas (floors, walls, etc)</td>
<td>F</td>
</tr>
<tr>
<td>Equipment/materials</td>
<td>F</td>
</tr>
<tr>
<td>Cleaning (all requirements detailed in EHO approval)</td>
<td>F</td>
</tr>
<tr>
<td>Handling</td>
<td>F</td>
</tr>
<tr>
<td>Personal hygiene</td>
<td>F</td>
</tr>
<tr>
<td>Health and safety/first aid</td>
<td>F</td>
</tr>
<tr>
<td>Waste (and disposal)</td>
<td>F, P</td>
</tr>
<tr>
<td>Pest Control</td>
<td>P</td>
</tr>
<tr>
<td>Malicious contamination</td>
<td>F</td>
</tr>
<tr>
<td>Temp Control</td>
<td>F</td>
</tr>
</tbody>
</table>

Key: F = Fishers;  P = Port Client Group
1.2 Site Location

The location of a port should take account of local activities and the port environs that might impact adversely the integrity of the landed seafood. The facilities provided must ensure at all times they minimise the risk of contamination to the product. The following measures will help to minimise or prevent contamination:

- Catch-landing and handling areas must be designed and dedicated for that purpose only and public access shall be restricted or managed during periods of landing catch.

- Sites for catch-landing and handling operations should be free from objectionable odours, smoke, dust and other contaminants (e.g. pesticides, infestation by pests, flooding).

- Catch-handling areas should be designed for flow-through of product which minimises risk of cross-contamination. An example of product flow system is provided in the Appendix A at end of this module.

- To simplify handling operations and to minimise exposure of the catch, it is recommended that the landing quay and fish market or storage facility are near to each other whenever possible. If this is not possible, the transfer of catch from quay to storage facility must be undertaken promptly to minimise exposure to the elements and risk of contamination. Where possible, ports should incorporate additional measures to minimise the risk of exposure to contamination, such as the construction of a canopy or transportation of fish in covered boxes.

- Vessel fuelling, waste storage or other potentially contaminating activities should not be conducted in areas used to handle and store the catch, unless measures are taken to prevent contamination.

- Stored bait must not contaminate fishery products or equipment that might come into contact with fishery products. To mitigate any such risk, this should be included in the port’s HACCP plan. All bait should be kept in separate storage areas to the catch; if this is not feasible, bait should be kept in a sealed leak proof container.

ABP approval is not required for undersize fish landed and sold directly as pot bait to other vessels operating out of the same port. Fisheries buyers and sellers rules still apply to this process; the vessel receiving the bait should to be registered as a ‘buyer’. Owners who store and handle undersize fish in any way before selling it as pot bait must have ABP approval.
1.3 Structural Condition

All areas subject to catch-handling operations must be hygienic and be constructed of materials that are easy to clean. Areas may be divided into external areas where fish is landed (and possibly stored) and internal areas used for storage and subsequent handling/sale.

External

- Quays, Jetties and their aprons etc. must be designed and constructed to enable them to be maintained in a hygienic condition. Concrete surfaces are generally recommended for jetties, quayside aprons etc. Granolithic concrete is recommended for areas subject to heavy use.
  - Power-floated finishes are not recommended as they are slippery when wet and potentially dangerous.
  - Wood decking is not recommended as it cannot be kept clean and may also be slippery when wet.
  - Asphalt and bituminous macadam may be suited for lightly loaded roadways but are not recommended for fish handling areas as they are not hard and are subject to attack by oils, including fish oils.
  - Working-area floor surfaces should be hard wearing, impervious and non-slip. Asphalt is not suitable for fish-handling areas or loading-bays as it is attacked by fish oils. Sets of concrete brick are not recommended for loading bays or quay aprons as they cannot be efficiently cleaned.

- Surface drainage slopes of 1 in 70 or 80 are recommended. Steeper slopes (eg 1 in 50) can be hazardous (slipping), and shallow slopes (eg of 1 in 100) require a high standard of finish to avoid puddles. Landing quays should not drain over the quay into the dock or over fishing vessels.

- Where practical, solid quay and jetty structures are preferred to open structures. Open structures, which may harbour debris, encourage vermin and can cause problems of vessels fouling on the structure on a rising tide, would require use of a detailed cleaning schedule.

- Bollards, fenders and other features should be simple and unadorned to avoid the lodging of debris and to facilitate cleaning. Systems of vertical fendering without horizontal surfaces that may collect debris, particularly fish dropped during unloading, are recommended. Rubber car tyres used as fendering must not be able to contaminate the catch, be clean and free of debris and checked on a regular basis.

- Wherever possible, fish should be protected from contamination in fish handling areas.

- The external areas must be maintained in good order, and potential pest-harbouiring areas shall be identified, monitored, removed prevented and recorded.

- The building fabric must be maintained to minimise potential for pest entry, ingress of water and other contaminants.
• All external structures should comply with marine safety in accordance with Port Marine Safety Code (PMSC).

• Where natural external drainage is inadequate, external drainage must be installed. Drains must be properly protected to prevent entry of pests and meet the requirements of the Environment Protection Agency and Local Water Company. Ports need a permit to discharge (consent) from the Northern Ireland Environment Agency, Scottish Environment Agency (SEPA) or the Environment Agency (for England and Wales); unless the port/harbour can prove their water discharge activity does not cause pollution. Drainage systems must comply with Port Health regulations.

Internal
The internal site, buildings and facilities must be suitable for the intended purpose. All utilities to and within the handling and storage areas must be designed, constructed, maintained and monitored to effectively control the risk of product contamination.

Auction/markets:
• Markets ‘need’ to be fully enclosed structures that provide a protected and hygienic environment capable of maintaining fresh fishery products at a temperature approaching that of melting ice (0°C to +4°C).

• Areas used for display or storage of fishery products should be insulated and, ideally, mechanically chilled. Doors providing access to and from the building should be the minimum compatible with efficient handling operations

• Market buildings, ice stores, chill stores and other fish handling rooms should be designed and maintained to prevent the entrance and harbouring of pests and wind-born contaminants such as dust and smoke etc.

Floors and drains:
• Floors must be impervious to water, and be easy to clean and disinfect. Floors should be non-slip and should have an even surface without puddling caused by hollows, cracks or crevices; and be sloped to drainage channels or gullies. Floor/wall junctions should be coved to aid effective cleaning.

• Non-slip polymer screeds and granolithic concrete surfaces are recommended for fish handling and storage areas, with drainage slopes of between 1 in 70 and 1 in 80 to continuous interceptor drains. Coloured polymer surfaces, which may be used to designate areas that are to be kept free for access etc., are recommended to ensure that the process flow within the market/selling area is optimised.

• Drains must be capable of handling all melt and wash-down water, and covers should be able to withstand heavy traffic. ‘U’ section channels fitted with removable covers to facilitate cleaning are recommended.

• Drainage covers must be constructed of an impervious and corrosion resistant material.
• Drains should be trapped to prevent the transfer of foul odours and back-up, and should preclude access of pests to the market. It is recommended that removable interceptor-baskets are fitted to separate solids from liquid wastes to minimise waste water discharge costs and to help prevent blockages of the drainage system. Designs that allow liquids to drain without flowing over trapped solids are recommended. Inspection chambers and convenient rodding points should be provided.

• Foul drainage ventilation ‘needs’ to be exterior to the building to prevent foul air from entering the building under working conditions. Drains must flow from ‘clean’ areas to ‘dirty’ areas (Buildings Regulations).

• Drainage channels that are fully or partially open are to be maintained so as to ensure that waste does not flow from a contaminated area towards or into a clean area, particularly in areas where foods likely to present a high risk to the final consumer are handled.

Walls:
• Walls and pipe work must be maintained in good structural condition and shall facilitate cleaning.

• Internal wall surfaces must be smooth, non-absorbent, washable and non-toxic, and be impervious to water to enable easy cleaning. A light-coloured finish is recommended to highlight dirt and facilitate effective cleaning. Surfaces should be resistant to impact damage, and areas vulnerable to heavy traffic (e.g. doorways and pillars) should be reinforced or protected by crash rails or posts.

• Pipework or conduit should be chased into the wall or boxed-in, or be bracketed sufficiently clear of the walls to enable thorough cleaning.

• Recommended finishes include smoothly finished, steel-floated concrete rendering coated with a smooth, cleanable coating (e.g. a hard two-pack epoxy paint and resin laminates laid direct onto the wall structure, or a high grade wall cladding and prefabricated plastic-coated metal/foam sandwich insulated panels.)

• Windows must be maintained to prevent dirt from building up. Windows that can be opened onto the outside must be fitted, where necessary, with insect-proof screens that can be removed easily for cleaning. Where open windows would cause contamination, windows must remain closed and fixed when fish is present.

Doors:
• The spacing, or number and size of doors that provide access to the catch handling areas should be the minimum compatible with efficient handling operations.

• Doors should be close fitting, durable and easy to clean. Insulated sectional up-and-over or sliding doors, of polyurethane infill (or similar) faced with plastic or plastic-coated steel, are recommended for catch handling areas. Doors should be lockable to prevent unauthorised people access but must conform to all current fire and safety regulations.
Docking-bays, secondary doors, buffer zones or strip curtains are recommended to reduce air exchanges to catch handling areas to help maintain chilled temperatures and to minimise the risk of access by pests or other wind-born contaminants.

For fork-truck or other mechanised operations, a maximum door width of 3 metres at 20 metres minimum centres is recommended, with additional doors for personnel access. Automatic or pull-cord activated power doors ensure opening and closing times are kept to a minimum. Door frames, mechanisms and vulnerable surrounding structures should be protected from damage by substantial kerbs or posts etc.

Fridge curtains on access doors for forklifts remove the need for pull cord or automatic doors.

Doors must be constructed to prevent dirt from building up (854/2002 regulations.)

Doors that can be opened onto the outside must be fitted, where necessary, with insect-proof screens that can be removed easily for cleaning (854/2004 regulations.)

**Ceilings and roof linings:**

Ceilings (or the interior surface of the roof where there is no ceiling) and overhead fixtures must be constructed and finished so as to prevent the accumulation of dirt and to reduce condensation, the growth of undesirable mould and the shedding of particles.

Surfaces should be light in colour to show dirt and so facilitate cleaning.

Prefabricated sandwich-construction insulated panels with a plastic coating, or resin laminates and epoxy paint on a hard cement render or concrete, are recommended.

Overhead pipework, ducting and beams etc., should be kept to a minimum.

Roof voids ‘need’ to be provided with access for inspection, maintenance and pest control.

**Lighting:**

Food premises must have adequate natural and/or artificial lighting.

Lighting levels should be appropriate to the tasks being carried out, be even and without shadow. A high level of 500 lux with a light coloured rendition on the walls is recommended where or when the catch is being inspected. But a lower level of 200 lux is adequate for catch sorting and cleaning. A level of 110 lux is adequate for laying out boxed fish and for ancillary areas.

Fluorescent or L.E.D lighting is recommended as it is more efficient and produces less heat and glare than other forms of light. Natural lighting of fish handling and storage areas should be avoided in order to prevent ‘greenhouse’ solar heating.
• Light fittings should be of a simple structural design, corrosion resistant and easily cleaned.

• Shatterproof plastic diffusers or shatterproof bulbs should be fitted to all light fixtures within fish handling and storage areas. Where possible, light fittings should be flush with the ceiling or be fitted and sealed to the ceiling. Lighting should conform to the standards of the Chartered Institute of Building Services Engineers/Health and Safety Executive. For safety, fittings must conform to as minimum the IP34 classification. Light fittings should be recorded on a ‘glass register’.

Ventilation:
• Suitable and sufficient natural or mechanical ventilation must be provided to the food premises and sanitary conveniences.
• Ventilators must be screened to prevent the entry of vermin and other pests.
• Mechanical air extraction from designated dirty/contaminated areas into designated clean areas must be avoided.
• Ventilation systems must be constructed so as to enable filters and other parts requiring cleaning or replacement to be readily accessible.
• Ventilation ductwork should be contained within the ceiling void or wall structure, or fitted so as to enable efficient cleaning and not provide opportunity for pest infestation or bird roosting etc.
• Ventilation should conform to the standards of the Institution of Heating and Ventilation Engineers/Chartered Institute of Building Services Engineers.

Utilities – internal water supply:
• Adequate provision must be made, where necessary, for washing food. Every sink or other such facility provided for the washing of food must have an adequate supply of hot and/or cold potable water be kept clean and, where necessary, disinfected.

• An adequate supply of potable water must be available and must be used whenever necessary to ensure that foodstuffs are not contaminated;

• If used, non-potable water (e.g. for refrigeration or fire control) must circulate in a separate duly identified system. Non-potable water must not connect with, or allow reflux into, potable water systems.

• Ice that comes into contact with food or which may contaminate food must be made from potable water or, when used to chill whole fishery products, clean seawater. It must be made, handled and stored under conditions that protect it from contamination.

• Ice that comes into contact with food should be free from contamination, as specified by the competent authority (Environmental Health). Provisions to check the adequacy of ice coming into contact with food should be included within a HACCP style plan.

• Clean seawater can be used with whole fishery products. When clean seawater is used, adequate facilities and procedures are to be available for its supply to ensure that such use is not a source of contamination for the foodstuff.

• Clean seawater can be used with live bivalve molluscs, echinoderms, tunicates and marine gastropods and also for external washing.
• Recycled water used in processing or as an ingredient must not present a risk of contamination. It must be of the same standard as potable water, unless the competent authority is satisfied that the quality of the water cannot affect the wholesomeness of the foodstuff in its finished form.

Layout and Product Flow:

• The auction/selling area must be designed logically, constructed and maintained to prevent cross contamination. An example of product flow is provided in the Appendix 1A.

• The process flow from catch intake to despatch must be arranged to minimise the risk of contamination or damage to the seafood.

• The auction/selling area must allow sufficient working space and storage capacity to enable all market/selling operations to be carried out effectively to maintain good hygienic conditions.

• Unloading and landing operations of fisheries products must be carried out rapidly to avoid contamination of product.

• Fresh fisheries products should be placed without delay in a protected environment at the temperature approaching that of melting ice (0°C to +4°C).

• At the time of display or storage of fishery products, the premises must not be used for other purposes.

• Vehicles emitting exhaust fumes likely to impair the quality of fishery products must not have access to the premises when fisheries products are being displayed or stored.

Equipment:

• Equipment that comes into contact with food must be kept in such good order, repair and condition as to minimise any risk of contamination.

• Equipment and material used for working on fishery products must be smooth and made of corrosion-resistant and non-toxic materials that are easy to clean and disinfect.

• Equipment must be cleaned effectively and where necessary, disinfected, at a frequency sufficient to avoid any risk of contamination.

• Equipment should be constructed of non-absorbent materials that are inert to fish, detergents and disinfectants under normal operating conditions. Stainless-steel and food-grade plastics are recommended for surfaces that come into contact with fishery products.

• Adequate facilities must be provided for the storage of working utensils and equipment.

• Equipment used in the auction/selling area must be appropriate, properly designed, used and maintained to ensure that it does not pose a potential contamination risk to the catch.

• Equipment must be constructed of appropriate materials and be of a suitable design to ensure it can be effectively cleaned and maintained.
• All equipment critical to product safety, quality and legality should be maintained to an agreed maintenance plan. Its operation must be monitored to ensure correct function.

• All surfaces that come into direct contact with the catch must be smooth and made of non-absorbent, corrosive-resistant and non-toxic materials and be inert to fish, detergents and disinfectants under normal operating conditions. Stainless-steel and food-grade plastics are recommended for surfaces that come into contact with fishery products.

• In order to ensure the quality and safety of fishery products, a programme of internal inspection, planned maintenance and a system for reporting and rectifying defects is recommended for all market structures and equipment.

• Choice of materials or finish of plant and equipment, particularly electrical fittings and controls and refrigeration equipment (condensers and evaporators), should be suitable for wet and salt-laden atmospheric conditions.

**Staff Facilities:**

**Toilets**

• An adequate number of flush lavatories must be available.

• Flush lavatories must be connected to an effective drainage system.

• Lavatories must not open directly into rooms in which food is handled.

• Rooms containing sanitary conveniences must be adequately ventilated and lit and must be kept clean and orderly.

**Washbasins**

• An adequate number of washbasins must be available, suitably located and designated for cleaning hands.

• Wash facilities must be provided in the immediate vicinity of every sanitary convenience and changing room, whether or not provided elsewhere as well.

• Washbasins for cleaning hands must be provided with hot and cold running water, materials for cleaning hands (antibacterial liquid soap) and for hygienic drying (single use towels or suitably designed and located hand dryers).

• Where necessary, the facilities for washing food must be separate from hand-washing facilities.

**Changing Facilities**

• Where necessary, adequate changing facilities for personnel must be provided.

• Accommodation for clothing must be in a suitable location.

• Suitable, secure and sufficient accommodation shall be provided for the clothing of any person at work, which is not worn during working hours.
• Separate accommodation **shall** be provided for clothing worn by any person at work but not taken home (i.e. over-coats and hats).

• The provision of suitably located washroom and changing facilities encourages high standards of personal hygiene and minimises risks of cross-contamination. The provision of canteens or dedicated areas for eating and drinking, and outdoors areas for smoking, encourages compliance e.g. with Food Safety Regulations which do not permit such practices in the catch handling areas.

• Toilets and wash-hand basins **must** be readily accessible at all times to all persons involved in the landing, handling, sale and transport of fish or in the handling of fish boxes, equipment and ice etc. Additional wash-hand basins are recommended for work areas associated with direct handling of the catch. Use of public facilities is not acceptable. Sanitary-ware and fittings should be robust and be of hygienic design. Hand washing facilities should be provided adjacent to toilets and in such a position that staff must pass them when returning to catch handling areas.

• Changing rooms should be equipped with benches and lockers. On arrival for work, staff **must** be able to access changing rooms without passing through fish handling areas.

### 1.4 Cleaning and Disinfection

The general principle behind cleaning is to keep food safe by removing contamination by bacteria, viruses, moulds, chemicals, allergens or physical contaminants. Cleaning also improves the working environment’s safety; for example, by removing potential slip and trip hazards. Effective cleaning removes bacteria from hands, equipment and surfaces, helping to stop harmful bacteria from spreading onto food.

Other than the requirements relating to quality of water supply used, Food Safety and Hygiene Legislation does not prescribe equipment or methods of cleaning and disinfection. The regulations, however, set minimum hygiene controls for cleaning:

• **Food premises must** be kept clean and maintained in good repair and condition.

• **Layout, design, construction, siting and size of food premises must** permit adequate maintenance and cleaning and/or disinfection.

• **Adequate facilities must** be provided, where necessary, for the cleaning, disinfecting and storage of working utensils and equipment.

• **Conveyances and/or containers used for transporting foodstuffs must** be kept clean.

• Where conveyances and/or containers have been used for transporting anything other than foodstuffs or for transporting different foodstuffs, there **must** be effective cleaning between loads to avoid the risk of contamination.

• **All articles, fittings and equipment with which food comes into contact must** be effectively cleaned and, where necessary, disinfected. Cleaning and disinfection must take place at a frequency sufficient to avoid any risk of contamination.
The requirement for the means of cleaning, however, is implicit in the standard of cleaning required.

- Clean sea water may be used for external washing such as washing down landing quays, areas where the catch is handled, for the washing of premises, equipment and vehicles as necessary.

- Clean water (clean sea water and fresh water of a similar quality) may be used with whole fishery products. Adequate facilities and procedures must be available for its supply to ensure that such use is not a source of contamination for the foodstuff. ('Clean seawater' means natural, artificial or purified seawater or brackish water that does not contain micro-organisms, harmful substances or toxic marine plankton in quantities capable of directly or indirectly affecting the health quality of food.)

- Landing quays etc. should be equipped with pressurised clean water, if clean seawater is unavailable.

- Stand-pipe connections and/or water hoses should be located such that they enable the cleaning of all fish handling and equipment storage areas.

- Seawater from the harbour/ port environs is prohibited for use as a cleaning agent because it may be contaminated and is corrosive.

- For small-scale port operations, hose washing and manual scrubbing may be adequate for cleaning the fabric of buildings, plant, equipment, boxes and transport. Adequate stocks of cleaning materials such as brushes, clothes, mops and buckets etc. and suitable detergents and disinfectants must be provided. Equipment and utensils used for cleaning should be resistant to the temperatures, detergents and disinfectants used.

- Plastic, brushes, sponges, and buckets are recommended in preference to natural products such as cotton mops and bristle brushes. It is recommended that hoses are fitted with trigger-operated adjustable spray nozzles to assist in washing down and to minimise water consumption. Portable high-pressure washers that can incorporate detergent injection and water heating are recommended for universal cleaning purposes.

- Where the scale of the operation justifies it, mechanical box-washing machines located separately from catch handling areas are recommended. Through-flow systems commonly feature three stages - a pre-rinse, a hot pressured detergent wash and a post rinse. Throughputs may be varied to suit the degree of soiling of the boxes. Soak-tubs may be used to extend the contact period for very badly soiled boxes. Adequate provision should be made for vapour extraction of the area. Pedestrian or rider-operated rotary mechanical scrubbers are recommended for cleaning of large areas.

- Provision should be made for the safe access to high level cleaning operations of gutters, skylights, overhead lighting, ceilings etc. by means of scaffolding or platform lifts or by hiring in services.

**Cleaning requirements:**

Cleaning can be broken down into two main types – “clean as you go” which involves clearing away used equipment, spilt food etc. as you work and cleaning work surfaces thoroughly; and “scheduled” cleaning which involves a formal cleaning schedule, see below.
The following formal cleaning processes are required to ensure that the port is maintained at an appropriate standard of hygiene:

- A documented formal cleaning policy.

- A formal cleaning schedule (FCS) in accordance with HACCP principles for the cleaning of facilities, equipment and internal surfaces used for storing and handling the catch. An example cleaning schedule is provided in Appendix 1D.

- The cleaning schedule should document the cleaning required and include:
  - The areas and equipment require to be cleaned.
  - The frequency of cleaning actions.
  - How areas/equipment is to be cleaned.
  - What materials (chemicals and equipment) are required for cleaning.
  - The person(s) responsible for organising and carrying out the cleaning schedules.

- Cleaning should proceed from designated ‘clean’ areas to ‘dirty’ areas. Cleaning should not be conducted while the catch is being handled or stored in the area being cleaned, as the catch could become contaminated. Cleaning schedules should not preclude a policy of ‘clean as you go’ which may be necessary in busy areas or in the event of contamination of the area or item of equipment.

  Detailed cleaning schedules can be designed for use in specific circumstances. For the purpose of illustration, an example is provided in Appendix 1D.

- Appropriate cleaning procedures should be implemented based on the level of risk.

- Cleaning records ‘need’ to be kept of all cleaning activity.

- The basic steps for effective cleaning and disinfection are:

<table>
<thead>
<tr>
<th>Step</th>
<th>Process</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Pre-clean</td>
<td>Remove dirt and food by sweeping, scraping, wiping or rinsing with water.</td>
</tr>
<tr>
<td>2</td>
<td>Wash</td>
<td>Use warm water and detergent. Soak if necessary.</td>
</tr>
<tr>
<td>3</td>
<td>Rinse</td>
<td>Rinse off detergents and any remaining food or dirt.</td>
</tr>
<tr>
<td>4</td>
<td>Sanitise</td>
<td>Sanitise to eliminate/reduce micro-organisms to safe levels.</td>
</tr>
<tr>
<td>5</td>
<td>Final rinse</td>
<td>Rinse off sanitiser (if necessary).</td>
</tr>
</tbody>
</table>

Cleaning Chemicals and equipment:

- Cleaning chemicals should be fit for purpose, suitably labelled, secured in closed containers and used in accordance with manufacturers’ instructions.

- Cleaning materials and equipment used for cleaning toilets should be segregated from those used elsewhere.
• Seawater should not be used for internal washing procedures as it is corrosive and may be contaminated. Stand-pipe connections and/or water hoses should be located such that they enable the cleaning of all fish handling and equipment storage areas.

• Cleaning equipment should be fit for purpose, cleaned and stored in a dedicated area.

• Cleaning chemicals should be stored in a dedicated and secure place with restricted access for authorised personnel.

Disinfectants and Sanitisers:

• All cleaning and disinfecting agents used must be approved for food use. They should not be perfumed for risk of tainting product and should not pose a threat by means of residual toxin.

• Disinfection products should meet BS EN standards. Check product labels for either of these codes: BS EN 1276 or BS EN 13697.

• Use cleaning and disinfection products that are suitable for the job, and follow the manufacturer’s instructions.

• See Appendix 1C for list of detergents and their application.

• Chemicals should not be mixed unless recommended by the manufacturer and only fresh solutions should be used at each cleaning session.

• Cleaning agents and disinfectants must not to be stored in areas where food is handled

Cleaning of Building Structures, Quays, Loading Bays and Yards:

• For small-scale operations at simple landing places, where vessels (that are based at other places) land directly to vehicles and where no equipment is used, there may be no need to provide washing equipment. However, a means of maintaining good hygiene standards remains necessary and the provision of water source with a hose pipe would be recommended to wash off any excess fish matter.

• Where landings are made direct to an approved establishment, the facilities of this establishment should be used. Where vehicle washing is required, a suitably surfaced and drained area should be provided. The actual washing of vehicles within markets or catch handling areas is not permitted.

• External landing areas (e.g. quays, jetties and their aprons) should be hosed down with potable water from public mains supply after fish handling operations, or clean seawater.

• The floor surfaces of the market or catch handling/storage areas should be brushed down after sale, or use, to remove any fish debris, sales tickets etc., and then hosed down with cold potable water and a sanitiser on a daily basis. At least once a week, it should be treated with a more powerful disinfection agent and power hosed. A rinse of dilute hypochlorite solution is recommended to reduce bacterial contamination and prevent fishy odours.
• Doors and lower surfaces of walls should be cleaned after use with special attention paid to areas around handles, light switches, pipework and fittings etc. Cleaning is easier if fish slime, inks and residues are still wet and not left to dry. If the slime has hardened, a solution of detergent in hot water should be used with a hand brush to remove stubborn residues. The higher surfaces of walls, ceilings and overhead light fittings should be cleaned once a month with a mildly alkaline detergent.

• All drains should be swilled thoroughly with cold water and a sanitiser after sale or handling operations. Grids should be removed and cleaned of debris by brushing or pressure spraying. Waste traps should be checked at least once a week, emptied and cleaned. A strong solution of hypochlorite, as per manufacturer’s recommendations, should be poured down the drains once a week after wash-down to kill any bacteria that could cause foul odours and for the control of Listeria.

• Toilets, urinals and wash-hand basins should be cleaned at least once a day and inspected regularly to ensure they are kept clean. A disinfectant solution should be used on water closets, basins and associated equipment including chains, levers, door handles, taps and light switches.

• Surface-water guttering and down-pipes should be inspected monthly and cleaned as necessary to remove any debris or fish waste carried up by birds and which may attract flies and lead to production of maggots.

• Waste-storage areas must be kept clean and tidy and should be hosed down once a day during use. A rinse with dilute hypochlorite solution is recommended to reduce bacterial contamination and to prevent fishy odours that attract flies and vermin.

• Cold water is adequate for rinsing off fish slime and residues that have not dried and hardened; and a hot-water temperature of 50 to 60 degrees centigrade is adequate for washing purposes when used with a suitable detergent.

• (Hot water at sterilisation temperatures of 82 degrees centigrade or above is not recommended for washing as it is potentially dangerous, expensive and tends to burn fish protein onto surfaces)

• Environmental swab-sampling within internal catch-handling areas should be carried out initially to verify the effectiveness of each formal cleaning schedule and quarterly thereafter. This demonstrates a high level of good practice, which will assure the supply chain about the effectiveness of cleaning schedules.

Cleaning of Plant and Equipment:

• Mechanical handling equipment, grading and weighing equipment, fish boxes, ice tubs and shovels, plastic pallets and other items of equipment that come into contact with fishery products must be cleaned thoroughly (which should be immediately after use).

• Equipment should be rinsed with clean water as soon as possible after use, before residues have time to dry and harden, followed by a detergent hot wash, then disinfection and a further rinsing with clean water. Badly soiled equipment or
boxes/containers may require leaving to soak in a disinfectant solution or the use of foam cleaner to extend the contact time.

- Complex items of equipment such as mechanised sorting, grading and weighing lines are best cleaned with a high pressure hose to reach inaccessible areas. Ensure machines are in 'cleaning mode' prior to cleaning; machines without a 'cleaning mode' should be isolated from the power supply before being cleaned.

- After cleaning, plant and equipment must not be exposed to contamination prior to re-use, unless cleaned thoroughly before being used.

**Health and Safety Aspects of Cleaning**

- Manufacturer's recommendations for the storage, dilution and method of application of cleaning agents and precautions necessary should be strictly followed.

- Protective clothing, including goggles, gloves, boots, waterproof aprons and head ware must be provided and worn as required and should be specified in the cleaning schedule.

- Electrical equipment should be in either 'cleaning mode' or isolated from the power supply prior to cleaning.

- The use of ladders, scaffolding, platform lifts and other equipment to clean ceilings, light fittings, gutters etc. must conform to the requirements of Health and Safety Legislation.

- Cleaning operations should be carried out after the sale when the catch has been removed. Cleaning operations should be completed before newly landed or delivered material is received.
1.5 Recommendations on Personal Hygiene

Protective Clothing

Protective clothing is worn to protect product from contamination and should be worn only at work. Protective clothing must be kept clean and in good condition. After work, it should be removed and stored in a suitable facility away from catch handling areas or sent for laundering. Waterproof clothing should be cleaned regularly throughout the day; other protective clothing should be changed and laundered whenever soiled, at least once a week. All clothing must be maintained in good condition and kept clean.

- Appropriate clean, suitable and, where necessary, protective clothing that cannot contaminate the seafood product shall be worn in food handling areas.

- All personnel entering catch handling and storage areas should wear clean, washable protective over-clothing, including coat and hat. Staff involved in ‘wet’ operations should wear waterproof aprons, leggings or waterproof trousers/tops and rubber boots. A stock of disposable hats / hairnets should be held for use by visitors.

- Hard hats are recommended for quayside operations or other operations, as required by Health and Safety legislation. Robust, waterproof non-slip footwear is recommended and must be kept clean. Safety footwear is recommended. Disposable or rubber gloves may be worn, if in good condition and kept clean.

- Suitable protective hats, coats and footwear should be provided for all market visitors.

- Where no need for protective clothing has been established by food safety or health and safety risk assessment, it must be fully justified and guidance provided to port staff on any limitations to personal clothing to prevent a contamination risk to the seafood product or themselves or other port users.

- Where protective clothing is used, it shall be kept adequately clean and be maintained. Changes of clothing shall be available as required.

- Where protective clothing is used, clean and dirty clothing shall be segregated and controlled to prevent cross contamination.

- Disposable protective clothing must be suitable and clean and must be subject to adequate control to avoid seafood product contamination.

- Employers must report defective protective clothing.

Personal hygiene requirements

Every person working in a food-handling area must maintain a high degree of personal cleanliness. The port’s personal hygiene standards should be documented and adopted by all personnel, including visitors to their facility. These standards shall be developed with due regard for risk of potential seafood contamination and should include document policies and form part of the HACCP assessment. For fish auction halls, signage that clearly sets out the hygiene rules for the hall should be displayed at entrances.
• All staff, buyers and visitors **must** wear protective clothing (e.g. toe-reinforced footwear) including headgear and suitable and clean protective clothing, while the market is in session.

• All staff should keep themselves and their clothing clean and refrain from unhygienic personal habits.

• Staff should not spit, pick their noses or scratch other body parts. They should not cough, sneeze or comb their hair over product and should not lick their fingers to separate sales tickets put on fish.

• Ports should have in place a policy on eating, drinking, smoking and spitting. Eating, drinking and smoking (including the use of e-cigarettes) are permitted only in designated areas, not in catch handling or storage areas. Spitting is banned throughout port premises/environs.

• Staff should wash and dry their hands thoroughly before handling food.

**Jewellery, Watches and Cosmetics:**

• The port should apply a jewellery policy, which should form part of a HACCP style plan.

• Personnel working in or entering catch handling areas **must** not wear jewellery, except for plain gold wedding rings or sleeper earrings; other exposed body piercings should be covered with coloured tape. Wrist watches, necklaces and broaches etc. are not permissible.

• Nail varnish **must** not be worn as it presents a potential foreign body risk to product, and perfumes should not be worn due to the possibility of tainting of product.

• Personal items and belongings (excluding personal mobile telephones) **must** not be taken into production areas without the permission of the port management.

• Eating (including the eating of confectionery and chewing of gum or tobacco), drinking and smoking **shall** not be allowed in the auction/selling or storage areas.
1.6 Transportation

Vehicle standards

- All vehicles used for transporting seafood products should have a storage area that, as a minimum, is fully enclosed. Ideally, the storage area should be insulated and/or refrigerated to maintain product quality and protect product from risk of contamination from the weather elements or any other air borne contaminate. This storage area **must** be constructed of material that is structurally in good condition to allow for rigorous and thorough cleaning and disinfection, and should be impervious.

- Transportation methods used to move the catch to port **shall** not pose a contamination risk to the stored seafood and must be maintained in a hygienic condition.

- Where vehicles are used for transporting the catch from landing areas or other ports to the auction or selling port, steps should be taken to minimise the risk of possible contamination from previous loads onto the stored catch.

- Items used to hold food (e.g. boxes) in vehicles and/or containers **must** not be used for transporting anything other than food where this may cause contamination.

- Where vehicles and/or containers are used for transporting anything other than food or for transporting different types of food at the same time, products **must** be separated effectively.

- Where vehicles and/or containers have been used for transporting anything other than food or for transporting different foods, you **must** clean effectively between loads to avoid the risk of contamination.

Vehicle / container security

- Food in vehicles and/or containers **must** be placed and protected in a way that minimises the risk of contamination.

- Procedures should be in place to ensure that the seafood product is held under secure conditions during transport and, where appropriate, loading and unloading to prevent theft or malicious contamination.

- Access to all vehicles should be restricted to authorised personnel. Procedures for maintaining the security of the vehicle should be documented and be understood by drivers and delivery staff. Where vehicle loading areas are fully enclosed, doors should be locked when not loading or unloading. The integrity of any seals used should be checked and recorded before unloading.

Vehicle management (port owned)

- The management of vehicles **shall** be organised to ensure legal requirements are met. Procedures **shall** be in place to ensure that road vehicles are maintained in a road worthy condition to reduce the risk of vehicle breakdown. Where legally required, vehicle operators **must** be registered with the appropriate authority.
Procedures **shall** be in place in case of vehicle breakdown or accident. The port’s HACCP should identify procedures in case of vehicle breakdown or accident.

- The procedures should ensure that product quality, safety and legality is maintained and should include:
  - Clear instructions and emergency contact numbers for the drivers
  - Instructions on how to preserve any specific temperature or other environmental control appropriate to the catch.
1.6 Health Checks and First Aid

Serious risk to public health can result from carriers of infectious diseases handling product. Annual medical checks for staff are recommended (see welfare section) and at other times, as necessary. Guidance for Food Businesses is given in ‘Food Handlers Fitness to Work’ publication by the Department of Health.

- Staff and visitors **must** report any illness to the food business operator, (eg supervisor), particularly gastric disorders, vomiting, digestive upsets, discharges from the eyes or ears, skin infections, sores and infected wounds. Staff found to be suffering from notifiable diseases must not handle product or allowed access to the food handling areas, and the local medical health officer must be informed immediately. Medical clearance may be required before return to work is permitted for certain infections. No person having untreated cuts, burns, sores or spots shall be allowed to handle product. Such injuries should be treated and covered with a waterproof dressing.

- Staff with diarrhoea or vomiting should not return to work until they have had no symptoms for 48 hours (FSA guidance).

- First-aid materials should be stored hygienically in a clearly marked easily accessible place and should be protected from dust and damp. In addition to the statutory requirements of first-aid boxes, finger stalls and rubber gloves are recommended to give increased protection. Plasters should be blue in colour and metal-detectable should they become lost. Stocks in the first-aid box **must** be replenished and maintained to comply with statutory regulations.

- The Health and Safety (First-Aid) Regulations 1981 require employers to provide **adequate** and **appropriate** equipment, facilities and personnel to ensure their employees receive immediate attention if they are injured or taken ill at work. **see HSE First Aid Guidance**
1.7 Pest Control

Pests carry harmful bacteria on their bodies and in their faeces/urine and pose a serious threat to food safety by contaminating product; they spread diseases and cause damage to structures and equipment. Pests, including birds, rodents, insects and pets must be excluded from product areas so that risk of contamination is as low as reasonably possible (ALARP).

The only legal requirements relating to pest control are as follows.
- Adequate measures must be taken, as far as possible, to prevent animals and pests causing contamination.
- Layout, design, construction, siting and size of premises must permit pest control practices.
- Food waste/refuse stores must be enabled to be free of animals and pests
- Adequate procedures must be in place to control pests.
- Adequate procedures must be in place to prevent access for domestic animals.
- Persons having access to the premises must not introduce other animals.
- Evidence of compliance must be provided.

Systematic pest control procedures must be adopted and should restrict access by pests to fish handling and storage areas. The procedures should identify any outbreaks and how to deal effectively and promptly with them, as part of the HACCP implementation; and they should be based on assessment of risk to food safety.

- The market ‘needs’ to have in place a policy on pest control, and a programme to minimise risk of infestation. An example of a pest control policy is provided in the Appendix 1A.

- The pest control policy should specify the frequency of inspection, monitoring methods, location of pest control bait boxes, substances used, a system for recording the results of inspection or any reported sightings, or evidence of infestation and the actions to be taken in the event of infestation.

- The pest control policy should be based on a HACCP-style risk assessment of the fabric of the building and the physical barriers that prevent access by pests, in order to consider, as a minimum:-
  - Types of likely pests; e.g., flies, rats, mice, birds (especially seagulls, pigeons), cats, dogs etc.
  - Likely areas of ingress/entrance; e.g., doors, drains, gullies, windows, ceilings and ventilation systems.
  - Evidence of activity; e.g. sightings, bodies, droppings, smears, tracks, burrows.
  - Documented evidence of activity (rodent) in last two years.
  - Likelihood of neighbouring properties to attract pests.
  - Pest prevention methods to be used; e.g.
    - Exclusion: refers to the methods adopted in preventing pest entry into a building. Exclusion is often neglected or ignored with entire reliance being placed on destruction, in many cases after infestation has occurred. The
use of pesticides may then fail to achieve the desired result because building structure and conditions within are incompatible.

- **Restriction**: refers to the methods used in creating unfavourable conditions for pests to harbour and breed.
- **Destruction**: refers to the physical and chemical methods that are commonly used to control pests
  - Identification of areas of greatest risk; e.g. areas for storing waste and fish products.
  - In the event of infestation or evidence of pest activity, immediate action shall be taken to eliminate the hazard. Any potentially affected fishery products should be subject to quarantine until the risk of potential contamination can be established.

- Ports management may contract the services of a specialist pest control company to ensure adequate protection.

- Alternatively, where a company undertakes its own pest control, it should be able to effectively demonstrate that:
  - Pest control operations are undertaken by trained and competent staff with sufficient knowledge to select appropriate pest control chemicals and proofing methods and understand the limitations of use, relevant to the biology of the pests associated with the site.
  - Sufficient resources are available to respond to any infestation issues.
  - There is ready access to specialist technical knowledge when required.
  - Legislation governing the use of pest control products is understood.
  - Dedicated locked facilities are used for the storage of pesticides.

- All personnel working in or entering fish handling or storage areas 'need' to be made aware of the importance of good housekeeping, the need to keep doors shut and to report any signs of infestation.

- Training in pest awareness should be given appropriate to all the market employees concerned i.e. working in or entering fish handling or storage areas must be familiar with the pest control program.). As a minimum, personnel should be able to recognise potential pests and their role in pest prevention.

- The organisation of a reporting system and maintenance of records is essential to highlight any recommendations, demonstrate compliance with legislation, monitor pest management process and provide evidence of compliance to third party audit.

- Pest control records **must** be maintained and should show, as a minimum:
  - The risk assessment process used to design the programme.
  - Clearly defined responsibilities for site management and for the contractor.
  - Detailed records of pest control inspections and recommendations.
  - Detailed records of any pest activity.
  - Detailed proof of recommendations being implemented.
  - Details of pest control products used and instructions for their use.
  - A site plan showing the location of pest control devices, and
- Actions taken in the event of an infestation (legal requirement 852/2004 Annexe 1.9 B).

- A programme to minimise risk of pest infestation must be in place. Where this is the responsibility of a landlord, the food business operator (FBO) must have access to pest control reports and should be made aware of any ongoing issues at the time of each pest control visit.

- An in-depth, documented pest control survey ‘needs’ to be undertaken at a frequency based on risk; typically, this should be done on a quarterly basis by a pest control expert tasked to review the pest control measures in place. The timing of the survey should be such as to allow access to equipment for inspection where a risk of stored fishery product insect infestation exists.

- Seagulls ‘need’ to be kept out of market areas using curtains on all market doors, or by other means.

- Seagulls ‘need’ to be prevented from defecating into the fish boxes during; the landing, or loading process or whilst sitting above market doors, through the use of preventative devices such as bird spikes or other means.

- The catch should be transferred to a storage facility/sale hall/covered transport immediately on discharge from the vessel.

- Fish in the open environment must not be left unattended or uncovered at any time.

- During the unloading process, all actions should be taken to mitigate the risk of contamination. Where possible, the fish should be covered to prevent ingress of contamination, or risk minimised by a responsible person supervising the unloading process.

- Food waste should be stored safely in areas that can be cleaned, are safe from pests, and do not cause other hazards until disposal. Improperly stored food waste is the main cause of pest infestations such as insects and rodents.

1.8 Food Protection, Security and Malicious Damage

This section covers actions required to protect food from malicious damage (vandalism/poisoning) and extraneous factors (e.g. dog fouling), and should be considered within the context of each category of port.

The legislation states

- At all stages of production, processing and distribution, food must be protected against any contamination likely to render the food unfit for human consumption, injurious to health or contaminated in such a way that would be unreasonable to expect it to be consumed in that state.
• Hazards to food protection **must** be identified in the port’s HACCP style plan and actions to prevent, eliminate or reduce the hazard also documented in the HACCP style plan.

Food Protection Management Policy

• The port/harbour ‘**needs**’ to have a clearly defined and fully documented food protection (security management) policy statement, conveying intentions to meet relevant legal obligations for seafood products, the objectives of the RFPS Standard and ensuring responsibility to their customers and the supply chain. The policy should be reviewed annually to ensure it remains fit-for-purpose.

• The first stage of this process would be a risk assessment to identify the potential threat levels relative to the category of port/harbour being assessed. Upon agreement, steps and measures will be implemented to mitigate any such identified risk, e.g. excluding the public from the quayside while the fish is being landed and sorted.

More information is provided in the PAS guide 96:2014 [PAS Guide to protecting and defending food and drink from deliberate attack](#)

Development of procedures /plans

• Methods **must** be put in place to ensure that whilst fish is under the care and supervision of the port, all reasonable measures are taken to protect it from malicious damage and/or contamination. Sufficient security should be in place to mitigate the risk of theft.

• Ports should develop, based on risk assessment, (eg Threat Analysis Critical Control Points (TACCP) principles), a bespoke procedure that **must** address the protection/security of the products and establish, implement and maintain a system to reduce or eliminate the identified risk.

Landing sites - specific threats

• Where possible, there should be a physical barrier that excludes the public and dogs etc. from the landing site. For landings to fish markets, this can often be achieved simply by placing gates, fencing or bollards on the quayside at each end of the market. It also improves security. Where this is not possible, a bylaw should be sought to restrict public access and/or the exercising of dogs and other animals on the site. Where open access cannot be denied, e.g. on beaches, particular attention **must** be made to handling and cleanliness to avoid contamination of product.

• To simplify handling operations and minimise exposure of the catch, it is recommended that the landing quay is close to the fish market or storage facility/vehicle.

• A responsible person should be assigned to manage the landing operations, and risks to both public and workers should be monitored continuously. Where necessary, operations should be stopped, or the public instructed to keep a safe
distance should it be assessed that either product or people are deemed to be at risk.

- Storage facilities provided at landing sites should be secure and have the ability to be tamper-proof (e.g. locked) to minimise risk of adulterated product.

**Market and auction sites**

- Access to the site by port staff, contractors and port users **must** be controlled, through designated entrances; and use of a visitor reporting system is recommended.

- Port staff **must** be trained in site security procedures and encouraged to report or challenge unidentified or unknown visitors.

- Contractors involved in maintenance or repair **must** be supervised by port staff who **must** be responsible for their activities.

- Catch landing areas should be designated and dedicated to catch landing, having site and layout to ensure minimum risk of contamination.
Appendix 1A: Pest control policy

Note: this is an example only and is not comprehensive. Port Facilities must develop a schedule that is specific to the requirements of their organisation.

Example of a pest control policy:

‘The whole site shall have an effective preventive pest control programme in place to minimise the risk of infestation and there shall be the resources available to rapidly respond to any issues which occur to prevent risk to products.’

Hazard Analysis

The process of producing a HACCP Plan involves two stages:

- Constructing process flow diagram/ market schematic to show the steps associated with the flow of product through e.g. the market.

- Identifying the potential hazards associated with each step.

Constructing Process Flow Diagrams and Market Schematics

A highly recommended method to help identify potential areas of cross-contamination is the use of:

- An accurate and detailed process-flow diagram (see example at end of section) that identifies potential sources (areas and activities) of risk and scope for potential hazards.

- A market schematic that shows the catch and traffic-flow of people.

Some Simple Guidelines

- The process-flow diagram should cover all steps of the operation, from receiving the catch to the final transportation of the fish as it goes into the supply chain, regardless of the size or complexity of the ports operation.

- The process-flow diagram should be kept simple without containing too much unnecessary details.

- The market schematic, or to put more simply the floor-plan, should indicate the flow of the incoming catch from reception, through storage, any preparation operations, any grading processes, any re boxing operations, as well as final storage (if applicable) after the sale and final shipping of bought fish to the buyer.

- The market floor-plan should also indicate the movement of products such as; waste, chemicals and all people, whether employees or other market operatives, as they pass throughout the premises, including any change rooms, washrooms and canteens that may be provided.
• The market floor-plan, if applicable, should identify potential areas for cross-contamination in the market or storage areas (for example, locations where low-risk products could come in contact with high-risk products).

• The process-flow diagram and market floor should be checked for accuracy by physically walking through the entire operation – this will confirm that all steps have been included and that product and employee flows are accurate.

• Variances that may occur during different operational cycles within the market should be considered.

Example Process flow diagram - Market Product Flow

1. Catch Reception or other Reception Area
2. Fish Chill Storage Area
3. Grading
4. Washing & Re-boxing
5. Removal of any Waste Material
6. Selling/Auction of Catch
7. Fish Chill Storage Area
8. Fish Dispatch Area

Conducting a Hazard Analysis Study

Once the potential sources of risk associated with the incoming catch, any preparation steps, product flow and employee traffic patterns have been identified, using the process flow diagram/floor plan, a hazard analysis study can be undertaken to monitor and control the hazards.

Guidelines

• A hazard is anything that may cause personal injury or illness if not controlled, reduced or prevented. Food hazards are classified as biological, chemical or physical.
• A team of people made up from all sectors of the market operation should be formed to assist in the identification of all hazards specific to their part of the operation.

• Numerous tools to assist in identifying hazards are available from the Seaﬁsh Website and it is essential that the key person in charge of the HACCP team undergoes some form of training prior to the completion of the ﬁnal HACCP study:
  - http://seafoodacademy.org/TheLibraryGuidesHACCP.html - library guide

Three types of hazard

Biological Hazards
- Biological hazards include micro-organisms such as bacteria, viruses, parasites, fungi and moulds.
- Sources of biological hazards that could be found in a market environment include the catch especially un-purified shellﬁsh, cross-contamination for high and low risk products, inadequate time or temperature control, employees, food contact surfaces or the air.
- Chemical Hazards

Chemical hazards include:
- Chemicals intentionally used in catch preparation (for example, preservation aids, machine lubricants).
- Industrial chemicals (for example, cleaning agents, oils, fuel, lubricants).
- Naturally-occurring toxicants (for example, animal or microbial metabolisms such as aflatoxins).
- Pest control chemicals (for example, pesticides, rodenticides, algicides).
- Food allergens (for example, nuts or shellﬁsh).

Chemical hazards may occur naturally or may be introduced during any stage of the market’s operation.

Physical Hazards
- Physical hazards include glass, plastic, metal, wood, rubber, stone, bone, dust, and insect parts.
- Physical hazards can be introduced anywhere along the market’s operation from equipment or employees, or can be inherent in the catch itself.

Using the process flow-diagram, it is then possible to conduct the hazard analysis for the handling activities of a Market:
<table>
<thead>
<tr>
<th>Stage</th>
<th>Hazard</th>
<th>Controls</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>1 and 8</strong></td>
<td><em>Physical</em> Dangerous or unwanted foreign bodies found catch bins/boxes/reception area.</td>
<td>Constant checks by market staff while storing the fish or moving the fish. High standards of market hygiene. Clean any spillages immediately, and check for visual or odour signs of chemical contamination before any fish is stored. Store all chemicals well away from fish handling or storage areas. Ensure staff hygiene standards remain high, and fish unloading areas are kept clean and in good condition.</td>
</tr>
<tr>
<td><strong>2 and 7</strong></td>
<td><em>Physical</em> Dangerous or unwanted foreign bodies.</td>
<td>Constant visual checks by market staff when working with fish; keep fish storage areas clean and in good condition. Clean any spillages immediately, and check the Chill store is maintained according to manufacturer recommendations. Ensure the chill store is operating to within the correct operating temperature zone. Ensure staff hygiene standards remain high, and fish holding areas are kept clean and in good condition.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Stage</th>
<th>Hazard</th>
<th>Controls</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>1 and 8</strong></td>
<td><em>Chemical</em> Contamination from any diesel spillages, or other chemicals, while on the vessel or during transport or during reception.</td>
<td></td>
</tr>
<tr>
<td><strong>2 and 7</strong></td>
<td><em>Bacterial</em> Bacterial growth caused by high temperatures or delay in handling fish on the vessel or during transport. Introduction of bacteria from poor staff hygiene, or dirty fish holding areas.</td>
<td></td>
</tr>
<tr>
<td>3, 4 and 5</td>
<td>Physical</td>
<td></td>
</tr>
<tr>
<td>------------</td>
<td>----------</td>
<td></td>
</tr>
<tr>
<td>Grading, Washing, and Re-boxing the Catch, and discarding of any waste material. (optional stage)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Physical</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Dangerous or unwanted foreign bodies in fish working areas.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Chemical</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Contaminants present in dirty water. Tainting of fish from cleaning chemical residues.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Bacterial</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Introduction of bacteria from water, or from poor staff hygiene, or dirty premises or equipment. Rapid growth of bacteria if fish is warm or if there is a delay in processing fish.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Keep all fish working areas and items of equipment clean and in good condition.

Use only clean potable water for washing fish. Ensure all work surfaces are fully rinsed after cleaning with chemicals.

Use only clean potable water for washing fish. Keep all fish working areas and surfaces clean. Keep staff hygiene standards high.

Ensure any waste material resulting from these preparation operations does not come into contact with fish waiting to be washed graded etc, or other baskets or boxes used for holding fish. Ensure staff hygiene standards remain high, and fish preparation areas are kept clean and in good condition.
<table>
<thead>
<tr>
<th>6 Selling/Auction of the Catch</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Physical</strong>&lt;br&gt;Dangerous or unwanted foreign bodies in boxes used to sell the fish.</td>
</tr>
<tr>
<td><strong>Chemical</strong>&lt;br&gt;Contamination from cleaning operations and equipment.</td>
</tr>
<tr>
<td><strong>Bacterial</strong>&lt;br&gt;Introduction of bacteria from poor staff hygiene, or dirty equipment. Rapid growth of bacteria caused by warm temperatures.</td>
</tr>
</tbody>
</table>

Ensure boxes are kept clean and in good condition. The infrastructure of the selling/auction areas is maintained in a good structural condition. Ensure all employees, users of the market, and visitors wear suitable, hygienic protective clothing and that good food hygiene practices are maintained.

Ensure all cleaning chemicals are thoroughly rinsed off after boxes are cleaned.

Ensure cleaning operations within the selling and auction area comply with cleaning procedures.

Ensure boxes are kept clean and in good condition. Keep staff and other market operatives' personal hygiene standards high. Smoking, eating and drinking are prohibited.

Do not use dirty ice. Ensure ice is stored in a clean and hygienic area.

Ensure sufficient ice is used to keep fish cold until it is sold and moved to refrigerated transport or chilled storage.

Ensure staff hygiene standards remain high, and fish selling areas are kept clean and in good condition.
## Appendix 1B: Glossary

<table>
<thead>
<tr>
<th>Term</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ambient</td>
<td>The temperature of the surrounding environment.</td>
</tr>
<tr>
<td>Bacteria</td>
<td>A group of single cell living organisms. Some may spoil food and some may actually cause illness.</td>
</tr>
<tr>
<td>Cleaning</td>
<td>The removal of food residues, dirt, grease and other undesirable debris.</td>
</tr>
<tr>
<td>Cleaning Schedule</td>
<td>Written document setting out how a market is to be kept clean. It will detail each area and piece of equipment to be cleaned; the cleaning product to be used; person/s with responsibility for carrying out cleaning; standard of cleanliness required; frequency; and Health and Safety precautions to be taken. All persons concerned must be aware of their individual responsibilities. A supervisor is responsible for checking the total cleaning process.</td>
</tr>
<tr>
<td>Chill Store or Refrigerator</td>
<td>Equipment for keeping food at chilled temperatures. (Usually set around 2 – 4 deg. cent. to allow ice to melt)</td>
</tr>
<tr>
<td>Compliance</td>
<td>Actions that satisfy the legal requirement.</td>
</tr>
<tr>
<td>Contact Surface</td>
<td>Any surface which comes, or may come, into contact with fish, either directly or in such close proximity that it could contaminate the food if dirty. Includes work surfaces, containers and equipment.</td>
</tr>
<tr>
<td>Contamination</td>
<td>The introduction or occurrence in food of any microbial pathogens, chemicals, foreign material, spoilage agents, taints, unwanted or diseased matter, which may compromise its safety or wholesomeness.</td>
</tr>
<tr>
<td>Core Temperature</td>
<td>The temperature at the centre of a mass or piece of food.</td>
</tr>
<tr>
<td>Disinfection</td>
<td>Reduction in levels of contamination on food equipment or in food premises, normally by the use of chemicals to kill micro-organisms. Disinfectants used must be suitable for use in food premises.</td>
</tr>
<tr>
<td>Infestation</td>
<td>Entry and survival of pest animals and insects within the Market or within equipment or products.</td>
</tr>
<tr>
<td>Hygiene</td>
<td>Measures to ensure the safety and wholesomeness of food.</td>
</tr>
<tr>
<td>Personal Cleanliness</td>
<td>Measures taken by food handlers to protect food from contamination.</td>
</tr>
<tr>
<td>Pest</td>
<td>Animal life that is a source of contamination in food premises; especially insects, birds, rats, mice and other rodents capable of contaminating food (directly or indirectly), and pets.</td>
</tr>
<tr>
<td>Term</td>
<td>Definition</td>
</tr>
<tr>
<td>---------------------</td>
<td>--------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Protective Clothing</td>
<td>Clothing that includes hats, boots, waterproofs, which are worn by the Market employees or Market users when handling fish to prevent contamination of fish by the individual.</td>
</tr>
<tr>
<td>Potable</td>
<td>Usually related to water supply. Safe to drink and acceptable for use in food preparation.</td>
</tr>
<tr>
<td>Spoilage</td>
<td>Fish deterioration resulting in off flavours, odours and possibly appearance indicating products are unsuitable for sale or to eat.</td>
</tr>
<tr>
<td>Taint</td>
<td>Contamination of food with undesirable flavours or odours.</td>
</tr>
</tbody>
</table>
Appendix 1C: Cleaning Chemicals Explained

Detergents

The following table lists types of detergent available and their applications. Types are listed according to their chemical constituents rather than their many and various trade names.

Types of Detergent and their Applications

<table>
<thead>
<tr>
<th>Detergent Type</th>
<th>Typical Ingredients</th>
<th>Typical Applications</th>
<th>Limitations of Use</th>
</tr>
</thead>
<tbody>
<tr>
<td>Acid</td>
<td>Acid, corrosion inhibitor, wetting agent.</td>
<td>Removing heavy deposits of scale or dirt.</td>
<td>Extremely corrosive, must only be used when wearing protective clothing including goggles and gloves.</td>
</tr>
<tr>
<td>Neutral</td>
<td>Synthetic surface-active agent.</td>
<td>Removing oil and grease.</td>
<td>May foam in high pressure equipment.</td>
</tr>
<tr>
<td>Mildly Alkaline</td>
<td>Synthetic surface-active agent polyphosphate, silicate proteins.</td>
<td>Removing fats and dissolving proteins.</td>
<td>Prolonged contact with skin should be avoided.</td>
</tr>
<tr>
<td>Strongly Alkaline</td>
<td>Silicate, carbonate, polyphosphate, wetting agent.</td>
<td>Softening water.</td>
<td>Contact with skin should be avoided.</td>
</tr>
<tr>
<td>Caustic</td>
<td>Sodium or Potassium Hydroxide, Sodium Orthosilicate.</td>
<td>Removing stubborn fats, dried proteins and tar.</td>
<td>Extremely corrosive, must only be used when wearing protective clothing, including goggles and gloves.</td>
</tr>
<tr>
<td>Abrasive</td>
<td>Abrasive powder, wetting agent.</td>
<td>Scouring hardened residues.</td>
<td>Should not be used on soft surfaces such as plastics.</td>
</tr>
</tbody>
</table>

Disinfectants

The following table lists disinfectants suitable for fish handling areas. Types are listed according to their chemical constituents, rather than trade names. It is recommended that suppliers and EHO are consulted to identify suitable disinfectants for specific purposes.

<table>
<thead>
<tr>
<th>Type</th>
<th>Typical Ingredients</th>
<th>Typical Applications</th>
<th>Limitations as to Use</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chlorine (Hypochlorite)</td>
<td>Sodium Hypochlorite in solution to give 10% chlorine (common household bleach).</td>
<td>Diluted to 150ppm for general use on floors, walls, equipment. Stronger solutions up to 1000ppm may be used for very dirty surfaces.</td>
<td>Chlorine is extremely corrosive and must be handled with care in concentrated solutions. It is advisable to rinse metal surfaces 10 minutes after exposure.</td>
</tr>
<tr>
<td>Chlorine (CTSP)</td>
<td>Chlorinated Trisodium</td>
<td>As above, but less</td>
<td>As above, but less corrosive</td>
</tr>
<tr>
<td>Crystals</td>
<td>Phosphate.</td>
<td>corrosive in solution.</td>
<td>in solution.</td>
</tr>
<tr>
<td>----------</td>
<td>------------</td>
<td>------------------------</td>
<td>-------------</td>
</tr>
<tr>
<td>Q.A.C.s</td>
<td>Quaternary Ammonium Compounds.</td>
<td>Any surface requiring a non-toxic non-corrosive disinfectant with a detergent action.</td>
<td>Readily inactivated by many substances including dirt, soap, plastic and detergents.</td>
</tr>
<tr>
<td>Amphoteric</td>
<td>Amphoteric surfactants.</td>
<td>Any clean surface requiring a non-toxic, non-corrosive, odourless disinfectant with a detergent action.</td>
<td>Relatively expensive and readily inactivated by many substances including dirt, plastic, soap, nylon and detergents.</td>
</tr>
</tbody>
</table>

**Difference between a Disinfectant and Sanitizer**

To disinfect is to cleanse so as to destroy or prevent the growth of disease carrying microorganisms. Therefore a disinfectant is an agent, such as heat, irradiation or chemical that disinfects by destroying, neutralizing or inhibiting the growth of disease-carrying microorganisms.

Further definitions of disinfectants are as products that are used on hard inanimate surfaces and objects to destroy or irreversibly inactivate fungi and bacteria but not necessarily their spores. Disinfectant products are divided into two major types: hospital and general use. Hospital type disinfectants are the most critical to infection control and are used on medical instruments, floors, walls, bed linens and other surfaces. General disinfectants are the major source of products used in industry, and everyday households.

To sanitize is to make sanitary, as by cleaning or disinfecting, and to be sanitary is to be free from elements such as filth or pathogens that endanger health. Sanitizers are used to reduce, but not necessarily eliminate, microorganisms from the inanimate environment to levels considered safe as determined by public health codes or regulations.

A Sanitizer has both detergent and disinfectant properties and is very useful as Sanitizing rinses for surfaces such as work surfaces, as well as equipment and utensils found in food-processing plants and eating and drinking establishments.
Appendix 1D: Example of a Cleaning and Sanitizing Schedule

Note: this is an example only and is not comprehensive. Port Facilities must develop a schedule that is specific to the requirements of their organisation.

Food handlers will after every auction/selling session:

- clean and sanitise the all parts of the market/selling hall
- clean and sanitise all the chillers
- wash and store equipment and any containers
- mop the exterior floor around the entrance to the market auction/selling area

Procedure: food handlers are to initial tasks scheduled tasks as completed or at the end of their shift. Please advise your supervisor if you were unable to complete a scheduled task. These tasks are essential to maintain food safety and should be completed at the frequency determined.

Month ................................................................ Week 1 2 3 4 5

<table>
<thead>
<tr>
<th>Task</th>
<th>Position/person</th>
<th>Frequency</th>
<th>Completed: tick or initial</th>
</tr>
</thead>
<tbody>
<tr>
<td>Area: Market Hall Auction/Selling Area</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Clean and sanitise food contact surfaces</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Clean as you go</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Clean and sanitise the Floor</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>daily</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Clean and sanitise walls interior near the floor up to a height of 2m</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>weekly</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Clean the top surfaces of the walls above 2 m and the ceiling</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>monthly</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Clean the external loading bays and landing bays</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>daily</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Task</th>
<th>Position/person</th>
<th>Frequency</th>
<th>Completed: tick or initial</th>
</tr>
</thead>
<tbody>
<tr>
<td>Area: Storage Areas</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Clean and sanitise the Floor</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>weekly</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Clean and sanitise walls interior near the floor up to a height of 2m</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>weekly</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Clean the top surfaces of the walls above 2 m and the ceiling</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>monthly</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Reviewed by Market manager: ........................................................................................................ Date:
Module 2- Port and the Working Environment (Safety)

2.1 Introduction - Due Diligence and Compliance with Legislation

The aim of this module is to provide a safe working environment through enhanced safety operational practices and welfare provision. Aspects covered include due diligence and compliance with legislation; improved skills and knowledge, and training provision; and health, safety and welfare rights (of port operatives).

Legal Compliances – safety rules and regulations

The UK ports industry is strategically and financially independent of government and each port has been delegated the responsibility to manage its limits to maintain safety access and operation. However, statutory port authorities, which are established mainly by individual Parliamentary Acts known as Harbour Orders, have to comply with a range of legislation.

The MMO has responsibility for Harbour Orders in England and Wales, with the exception of Welsh fishery harbours which are dealt with by Welsh Ministers. In Northern Ireland, Harbour Orders are dealt with by the Department for Infrastructure. Since 2013, power has been devolved to Scotland in relation to Harbour Orders. Transport Scotland handles such policy matters in liaison with Marine Scotland and the Department for Transport.

Much of the legislation stems from the Harbours, Docks and Piers Clauses Act 1847, the Harbours Act 1964, the Dangerous Vessels Act 1985, the Pilotage Act 1987, the Merchant Shipping Act 1995 and as with all UK businesses/operators, the Health & Safety at Work Act 1974. As well as these, ports also have to comply with the Government’s Port Marine Safety Guidelines, the Port Marine Safety Code, and the landside equivalent, the Approved Code of Practice LI48 Safety in Docks.

<table>
<thead>
<tr>
<th>Safety considerations</th>
<th>Category of Port</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Level 1</td>
</tr>
<tr>
<td>Port operations</td>
<td>F</td>
</tr>
<tr>
<td>Landing operations</td>
<td>F</td>
</tr>
<tr>
<td>Skills, knowledge and training</td>
<td>F</td>
</tr>
<tr>
<td>Health and safety</td>
<td>F</td>
</tr>
<tr>
<td>Welfare</td>
<td>F</td>
</tr>
</tbody>
</table>

Key: F=Fishermen; P= Port Client Group

Port operations

Ports have to operate according to good practice guidance published by the Maritime and Coastguard Agency (MCA), which covers all aspects of the running of ports and harbours, and is effectively a safety management system. Each port authority has to confirm compliance with the code every three years and publish performance against targets, annually. Each year, the MCA audits a selection of ports at random.

In addition, all ports are expected to comply with the UK Port Marine Safety Code (PMSC) Appendix 2A. The PMSC, which was developed in 2000 by Dept. for Transport (DfT) and MCA, offers a national standard for port safety in the UK with the aim to, "improve safety
for those who use or work in ports, their ships, passengers and cargoes, and the environment”. The code is not statutory and failure to comply is not an offence in itself; however, the code sets out references to existing legal duties and not adhering to it may indicate of a breach of those duties. The Code is subject to a triennial review process by a steering group of maritime organizations. It was reissued in 2003, 2006, 2009 and 2012.

The PMSC works alongside the MCA good practice guide.

Ports:

- should comply with MCA good practice guide (and provide proof of compliance).

- should comply with Port Marine Safety Code guidelines (and provide proof of compliance), see summary in Appendix 2A.

- should ensure their auction halls and wholesale markets have a valid EU Approval Number (contact Local Authority)

- in Wales must be registered as a ‘Hazardous Waste Producer’ (contact Natural Resources Wales).

- should be able to demonstrate actions taken/being taken to address any historic/current food safety notices (contact Local Authority).

- should able to demonstrate actions taken/being taken to address any historic/current Health and Safety notices (contact Local Authority)

- should be able to demonstrate actions taken/being taken to address any historic/current environmental notices (contact Local authority).

- that operate a market or auction site must have a designation number as a registered auction site from the relevant fisheries department as per the ‘buyers and sellers’ requirements.(Contact MMO, Marine Scotland, Welsh Government or Department of Agriculture Environment and Rural Affairs Northern Ireland (DAERA)"

- must ensure all buyers and sellers operating on their market are registered as a fish buyer and/or fisher seller and have proof of a designated number with the relevant devolved fisheries department.

Legal Landings Obligations

To ensure that ports adhere to legal requirements for the purchase, handling and reporting of fish from EU waters and elsewhere:

- Ports should retain (and make available for inspection) the following documentation for all fish received into the port, ideally in electronic format:
  - Catch certificates
- Landings documentation/information

- Ports should acknowledge the ‘Ports State Measures Agreement’ scheme to minimise entry of IUU fish into UK. This could be evidenced through a policy. Ports should undertake training or awareness courses to facilitate recognition of signs of IUU activity and commit to passing on such information to the appropriate authorities (i.e. MCA / MMO).

- Ports should secure from fish selling agents (FSAs) operating on their premises a letter claiming their legal operation and accordance with their contractual arrangements with the port.

BSI have a useful code of practice:
PAS 1550 Exercising due diligence in establishing the legal origin of seafood products and marine ingredients
The document sponsors are EJF, OCEANA, PEW Charitable Trust, WWF

Modern Slavery Act; The Modern Slavery Act came into force in March 2015. The Act aims to prevent all forms of labour exploitation and increase transparency of labour practices in supply chains.

S.54 of the Act requires organisations to report on the processes and due diligence taken to ensure that their supply chains are slavery free. This 'Transparency in Supply Chains' clause requires organisations with a worldwide turnover of £36m or more and that have a 'demonstrable' presence in the UK to produce and publish a slavery and human trafficking statement each financial year ending on or after 31 March 2016.

The statement is a summary of the steps the organisation has taken during the financial year to ensure that slavery and human trafficking is not taking place in any part of its business or its supply chains. A statement needs to be published regardless of whether any steps have been taken or not. While a disclosure stating that the company does nothing to prevent such practices is legally compliant under the law, such a disclosure can leave a company susceptible to negative publicity from customers and human rights organisations.

Seafish guide to drafting a modern slavery statement is available on this webpage - http://www.seafish.org/responsible-sourcing/ethics-in-seafood/modern-slavery-statement-guidance

2.2 Improve Skills and Knowledge, and Training Provision

EU Hygiene Regulations 852/2004 establishes a requirement for all food handlers to be supervised and instructed and/or trained in food hygiene matters commensurate of their work activities.

At all levels of the organisation, port staff should have the ability, training, expertise and, where necessary, professional qualification to efficiently undertake their duties and discharge their responsibilities. Food handlers should understand clearly their duties and responsibilities which should be defined in a written job description that specifies the skills and knowledge required.
Where casual staffs are employed or bonus schemes used, training may need to be reinforced by a higher level of instruction and supervision. The level and content of training, instruction or supervision should be determined having regard to the nature of the operations and the role of the food handler. Training requirements and the qualification/experience/competence of the handler should reflect, particularly, the levels of seafood product risk and the working environment. Managers and supervisory staff should have a clear understanding of both technical requirements of seafood product quality and safety and their own legal responsibilities.

**Personnel training and competence**

- A port ‘needs’ to have in place an organizational structure that defines roles and responsibilities of the key staff and is communicated effectively to all staff.

- The port should have a policy stating that appropriate personnel will be trained to an appropriate level.

- The port **shall** ensure that all their employees are adequately trained, instructed and supervised commensurate with their activity and are competent to undertake their job role.

- Records of training **shall** be maintained to enable validation of training carried out.

- Port staff involved in the landing and handling of fishery products should be trained in food safety, personal hygiene, and manual handling.

- Those involved in selling, buying, grading and inspection should receive additional training, if required, in seafood quality control, assessment, and species recognition. The training may include an understanding of the fish spoilage process, potential risks from contamination and the means of minimising both.

- Those responsible for the overall standard of upkeep on and operation of the port premises and the equipment ‘need’ to be trained to a level appropriate to their position in:
  - Food safety.
  - Safe cleaning (Control of Substances Hazardous to health (CoSHH)).
  - Personal Protective Equipment (PPE) requirements.
  - Recognition of signs of pest infestation.
  - Prevention of contamination by infestation.
  - Having a clear understanding of the importance of high standards of cleanliness and the means of achieving them by using documented cleaning schedules, and
  - Maintenance of training records.

- Staff fork-lift operators **shall** be trained as appropriate.

- Basic personnel management and workers’ rights.
• Procedures **must** be in place to ensure high-visibility clothing and life-jackets are worn in designated areas where appropriate or where risk assessment deems it necessary.

• The employer should appoint one or more ‘competent person’ to assist in undertaking the measures he needs to take to comply with the requirements and prohibitions imposed upon him. As such, a ‘competent person’ should be designated to coordinate training activities and keep records that can be used to validate compliance. In-house training is considered adequate, though external courses might provide additional assurance. Seafish courses available are detailed in Appendix 2E.

**Staff Welfare**

All staff should receive training that focuses on equal treatment of workers and on workers’ protection through knowing their rights and being freely able to exercise their rights. This can be invaluable in getting workers to be more motivated, prepared to speak up when they see or experience poor working conditions and possible infringements of safety or environmental rules and if they have concerns about the welfare of a colleague etc.
2.3 Health and Safety of Port Operatives (Based on ILO working conventions)

Legislation concerning personal health, safety and welfare requires ports to provide, as necessary, staff facilities such as toilets, washing and changing rooms, and places obligations on business operators to ensure a safe working environment and safe operating practices for port staff/employees.

Legislation
The Workplace (Health, Safety and Welfare) Regulations 1992, the Docks Regulations 1998 and the Loading and Unloading of Fishing Vessel Regulations 1988 prescribe requirements for staff facilities, safe access to and from fishing vessels, quay-side ladders, life-saving equipment, standards of lighting, protective clothing and the safe operation of mechanical handling and lifting equipment. Health and Safety legislation is enforced by the Health and Safety Executive (HSE).

Health and safety Risk Assessment
The port operator must conduct a full Health and Safety risk assessment that is required by law to protect all employees and users of the market. An example of how to conduct a risk assessment and what should be highlighted within it has been detailed in the Appendix 2B of this module. To support this risk assessment, the following documentation/procedures should be developed and recorded:

- a procedure stating how to record health and safety related violations and corrective actions available to employees/subcontractor. As a minimum, this would cover the process to record the incident in a database and to take corrective action.

- documentation demonstrating that a clearly identified, named employees’ representative and / or an employees’ council (the ‘competent person’) representing the interests of the employees to the management is elected or nominated by all employees and recognized by the management. This person would need to be able to communicate complaints to the management.

- a complaint procedure exists and that the employees, buyers and sellers have been informed about its existence and complaints or suggestions can be made. The complaint procedure should specify a time-frame to resolve complaints. Complaints and their solutions from the last 24 months would need to be documented and accessible.
2.4 Welfare of Port Employees and User Operatives

Employment and salaries

- The port will need to document that the management (and the employees’ representative, if appropriate) has agreed, signed and clearly displayed a self-declaration assuring good social practice and human rights of all employees. This declaration, as a minimum, should contain commitment to the ILO core labour conventions (ILO Conventions 111 on discrimination, 138 and 182 on minimum age and child labour, 29 and 105 on forced labour, 87 on freedom of association, 98 on the right to organize an collective bargaining, 100 on equal remuneration and 99 on minimum wage); be transparent and non-discriminative in hiring procedures; and the complaint procedure must include the rights of migrant workers in C97 and 143.

Port employees will need to be informed about the self-declaration and that it should be revised at least every 3 years, or whenever necessary.

- The port is required to demonstrate that the “designated person” for workers’ health and safety has the knowledge and/or access to the relevant national and EU regulations. In addition, the “designated person” should have a working knowledge of gross and minimum wages, working hours, union membership, anti-discrimination, child labour, labour contracts, holiday and maternity leave, medical care and pension/gratuity.

- The port will need to document that every employee has a contract or work agreement in a language that they understand fully; an example of minimum work agreement requirements can found in Appendix 2D. Both the employee and the employer must sign these documents. All contract records, as a minimum, must contain full names, nationality, a job description, date of birth, the regular working time, wage and the period of employment. Records of all employees (also subcontractors) must be accessible on an on-going basis (based on a 24 month cycle.)

- The port will need a documented policy and records of how each employee has been paid e.g by salary transfer (e.g. employee's signature on pay-slip, bank-transfer). Employees will need to sign or receive copies of pay-slips / pay-register that make the payment transparent and comprehensible for them.

- The port will need a documented policy and records that overtime payment are documented on the pay-slips / pay-registers indicate compliance with legal regulations (minimum wages) and/or collective bargaining agreements (if applicable). If payment is to be calculated per unit, employees shall be able to gain at least the legal minimum wage (on average) within regular working hours.

- The port will need to show records indicating compliance with national legislation regarding minimum age of employment. The UK national legislation states that children below the age of 16 must not be employed. Young persons (e.g. between the ages of 16-18) hired part-time must not engage in work that has been risk-assessed as being dangerous to their health and safety, jeopardizes their development or prevents them from finishing their compulsory school education.
• The port will need a documented policy and records to show that they are engaged with the suppliers and users of the market on implementing, in the value chain, the principles of the social-accountability-criteria that have been adopted by the port.

The use of supplier agreements is recommended (e.g. ‘Verité Toolkit’ templates) Seafood industry Responsible sourcing Tools.
  o An example of a code of conduct that should be signed by a port can be found at Welfare code of conduct to be signed by ports.
  o An example of a supplier agreement that ports could require suppliers/sub-contractors to sign can be found at Supplier agreement to be signed by suppliers or sub-contractors.
  o Examples of both can be seen in Appendix 2F.

• Other useful resources are also available from Stronger Together – Tackling Modern Slavery in UK Businesses toolkit

• The port will need a documented policy and records on fair operating practice, which need to be made available to all managers and key personnel of the port. As a minimum, the policy must cover bribery, corruption, coercion and inappropriate political lobbying or contributions, and that employment is chosen freely, with no forced, bonded or involuntary labour.

• The port will need a documented policy and records on agency workers as being potentially vulnerable to high risk of exploitation. This policy would trigger a risk assessment and additional due diligence enquiries where these workers are present. The use of agreements with suppliers to operate to the minimum levels of worker welfare described within the standard is recommended. Additional diligence enquiries could take the form of evidence of using proxy indicators to assess welfare remotely. Examples of such indicators include: insufficient and inadequate protective clothing, dishevelled appearance and unwillingness to engage in general conversation and activities, and evidence of minor injuries. Further examples are listed in Gangmasters and Labour Abuse Authority (GLAA); Labour Exploitation -Spot the Signs, along with telephone numbers of helpful contacts and support organisations.

• The port will need a documented policy and records to show that they have in place effective grievance mechanisms and workers’ awareness of their rights, both of which are fundamental to ensuring that workers employed or using the market are not vulnerable to exploitation.
Appendix 2A: A Summary of the Port Marine Safety Code

The Port Marine Safety Code (the Code) applies to all harbour authorities. The Code is primarily intended for “the duty holder” who is directly accountable for the safety of marine operations in their waters and approaches. In most authorities, the harbour board is the duty holder, so board members should regard themselves as individually and collectively responsible for meeting the Code’s standards.

The Code has been developed by Department for Transport and Maritime and Coastguard Agency (MCA) to improve safety in UK ports and to enable harbour authorities to manage their marine operations to nationally agreed standards. It provides the standard against which the policies, procedures and the performance of harbour authorities can be measured. It also describes the role of board members, officers and key personnel in relation to safety of navigation and summarises the main statutory duties and powers of harbour authorities. As well as complying with these duties and powers, the authority must develop an effective marine safety management system based on formal risk assessment. When fully implemented, the Code should reduce the risk of incidents occurring in harbour waters and provide some protection for the duty holder if an incident does occur.

In order to comply with the Code, the duty-holder on behalf of the harbour authority must:

1. Review and be aware of their existing powers based on local and national legislation;
2. Comply with the duties and powers under existing legislation, as appropriate;
3. Ensure all risks are assessed formally and as low as reasonably practicable in accordance with good practice;
4. Operate an effective marine safety management system (SMS) that has been developed after consultation and uses formal risk-assessment;
5. Use competent people (i.e. trained, qualified and experienced) in positions of responsibility for safety of navigation;
6. Monitor, review and audit the marine SMS on a regular basis – an independent designated person has a key role in providing assurance for the duty holder;
7. Publish a safety plan(s) showing how the Standard in the Code will be met and a report assessing the performance against the plan;
8. Comply with directions from the General Lighthouse Authorities and supply information & returns as required.

In addition, harbour authorities should seek additional powers if the existing powers are insufficient to meet their obligations to provide safe navigation. It is strongly advised that the duty-holder and all officers involved in marine safety consider the guidance provided on how to comply with this Code and review the lessons learnt from incidents that have occurred in
harbours. Guidance can be found in “A Guide to Good Practice on Port Marine Safety Operations”; recommendations and the common lessons that can be learnt from major incidents can be found on the Marine Accidents Investigation Branch website.

The Code is divided into four main sections:

1. Accountability for marine safety: This part identifies who is accountable for marine safety in the harbour waters and the approaches. It is based on these general principles:
   a. The duty-holder, on behalf of the harbour authority, is accountable for managing operations within the port safely and efficiently.
   b. Harbour authorities should make a clear published commitment to comply with the standards laid down in this Code.
   c. Executive and operational responsibilities for marine safety in harbour authorities must be clearly assigned, and those entrusted with these responsibilities must be answerable for their performance.
   d. A ‘designated person’ must be appointed to provide independent assurance about the operation of its marine safety management system. The designated person must have direct access to the board.

2. Key measures needed for compliance:
   a. Powers, policies, plans and procedures should be based on a formal assessment of hazards and risks, and harbour authorities should have a formal marine safety management system.
   b. The marine safety management system should be in place to ensure that all risks are controlled – the more severe ones must either be eliminated or kept “as low as reasonably practicable” (ALARP).
   c. All parties involved in the management and safety of navigation must be competent and qualified up to a minimum national standard.
   d. Harbour authorities should monitor, review and audit the marine safety management system on a regular basis.
   e. Harbour authorities should publish plans and an assessment of their performance in meeting their obligations under the Code, at least once every three years.

3. General duties and powers: For the purposes of this Code, the duty-holder should ensure that the harbour authority discharges its responsibilities to:
   a. Take reasonable care, so long as the harbour is open for the public use, that all who may choose to navigate in it may do so without danger to their lives or property.
   b. Conserve and promote the safe use of the harbour; and to prevent loss or injury caused by the authority’s negligence.
   c. Have regard to the efficiency, economy and safety of operation as respects the services and facilities provided.
   d. Take such action that is necessary or desirable for the maintenance, operation, improvement or conservancy of the harbour.
   e. Ensure that enough resources are available to discharge their marine safety obligations and set the level of dues accordingly.
4. Specific duties and powers: The duty holder should also be aware of other specific duties and powers which are relevant to port safety, including the following:
   a. Powers to direct vessels are available and should be used to support safe navigation.
   b. Dangerous vessels and dangerous substances (including pollution) must be effectively managed.
   c. A pilotage service must be provided if required in the interests of safety.
   d. Harbour authorities have duties and powers as local lighthouse authorities. Aids to navigation must be provided (as necessary), properly maintained and any danger to navigation from wrecks, obstructions or changes in the navigable waterway effectively managed.
Appendix 2B: Health and Safety Risk Assessment – General Guidelines

Risk assessments are part of the risk management process and are included in the management of Health and Safety at Work Regulations. A risk assessment is the process of identifying hazards that exist or may appear in the workplace. A risk assessment defines workplace hazards likely to harm employees and visitors.

Risks need to be considered in all aspects of the working environment. Examples of some areas which should be covered by a risk assessment include:

- Hazards: electrical safety, fire safety, manual handling, hazardous substances, risk factors for repetitive strain injury, stress, violence; slippery surfaces
- Tasks: cleaning with chemical substances, maintenance work or dealing with the public;
- Organisational factors: staffing policies, systems of work, equipment-purchasing policies, consultation and participation, management techniques or working hours, night working shift patterns, lone working; periods of intense working;
- Bullying

By law, every employer must conduct risk assessments on the work their employees do. If the company or organisation employs more than five employees, then the results must be recorded with details of any groups of employees particularly at risk such as young, pregnant or disabled employees.

Risk assessments should be simple to conduct and follow a process that includes:

- looking for and listing the risks to health and safety;
- deciding who might be harmed and how;
- checking that protective measures are effective;
- evaluating the risks arising from the hazards and deciding whether existing precautions are adequate;
- recording the findings; and
- reviewing the assessment from time to time and revising it when required, particularly if the building is refurbished, has moved, or changes in staffing.

Example Health and Safety Risk Assessment

The market manager conducted the risk assessment, which covers fish goods inward from the reception to a chill cold store, its storage and its despatch.

How was the risk assessment done? The manager followed the guidance in “Five steps to risk assessment”, which can be found at www.hse.gov.uk/pubns/indg163.pdf or www.worksmart.org.uk

Step 1. To identify the hazards, the manager:

- looked at HSE’s web pages for free health and safety advice and guidance for the warehousing industry, and at HSG76 Warehousing and storage: A guide to health and safety ISBN 978 0 7176 6225 8 (available from HSE Books, www.hsebooks.com or 01787 881165), particularly the chapter on temperature-controlled storage;
• walked around the areas where staff, customers and others may go, noting what might pose a risk and taking HSE’s guidance into account;
• talked through the issues with the safety representative, including how knowledge of risks and risk controls could effectively be communicated to the two staff members who did not speak good English, and health and safety training for agency staff;
• talked to supervisors and other members of staff to learn from their detailed knowledge of particular jobs and areas, and to discuss whether safe working procedures needed to be developed for certain jobs; and
• looked at the accident book to get information on past problems.

Step 2. The manager then wrote down who would be harmed by the hazards and how.

Step 3. The manager took account of HSE’s guidance. Where he did not consider existing controls good enough, he wrote down what else was needed to control the risk.

Step 4. The manager discussed the findings with the safety representative. Then, to implement the findings of the risk assessment, the manager decided who was responsible for each of the actions that were needed, and when each action should be done. He recorded the date when each action was completed.

Step 5. The manager decided to review and update the assessment at least once a year, or at any time when major changes to the workplace occurred, such as the introduction of a new plant or process. Important reminder

This example risk assessment shows the kind of approach a market/selling area might take. Use it as a guide to think through some of the hazards in your operation and the steps you need to take to control the risks. Please note that it is not a generic risk assessment that you can just put your operation’s name on and adopt wholesale without any thought - this would not satisfy the law and would not protect people effectively. Every business is different – you need to think through the hazards and controls required in your business for yourself.
## Example Health & Safety Risk Assessment

<table>
<thead>
<tr>
<th>What are the hazards?</th>
<th>Who might be harmed and how?</th>
<th>What are you already doing? (Control measure)</th>
<th>What further action is necessary?</th>
<th>Action by whom?</th>
<th>Action by when?</th>
<th>Done</th>
</tr>
</thead>
</table>
| Accidental lock-in in the chill store. | Staff and visitors may suffer potential illness and death due to prolonged exposure to low temperature, if accidentally locked within a chill storage facility. | Note all the systems that are currently in place to prevent this occurrence; eg -  
• restricted use  
• no entry signs to unauthorised use  
• emergency exits  
• emergency lighting  
• emergency door release systems  
• alarms etc. | Communication and training for all market staff and users. | manager | date | date |
| Accidental release of Group 2 refrigerant (ammonia). | Staff and visitors may suffer fatal respiratory irritation from exposure to ammonia. Even low levels of exposure can cause severe eye and throat irritation. | • The maintenance plan is effective and complied with.  
• The equipment is serviced by reputable maintenance company who have the correct expertise to service this type of machines.  
• Staff and visitors are trained on how to detect possible ammonia leaks.  
• Staff and visitors are trained on what to do in the event of an ammonia leak.  
• Vapours detectors are in place and serviced to an agreed maintenance plan. | Conduct monthly checks on vapour detection systems. Conduct training on the actions to be taken as part of an emergency plan. | manager | data | date |
| Workplace transport vehicle movement in the reception and the loading bay. | Staff and visitors may suffer very serious, life threatening injuries, such as fractures and internal damage, if struck by a vehicle. | • Pedestrians kept apart from moving vehicles by railings and marked walkways.  
• Road surfaces in good condition.  
• Measures in place to minimise reversing on site.  
• Reversing aids (mirrors) in place.  
• High-visibility tabard worn by all those entering the yard/loading bay.  
• Drivers hand in keys when vehicle parked.  
• All visitors receive site rules/site map.  
• Sufficient numbers of trained banksmen on site for each shift.  
• Any necessary reversing on site directed by a trained banksman, working from a safe position.  
• Walkways clearly marked. | Mark out ‘safe area’ for visiting drivers during loading and unloading of their vehicle.  
Install extra signage reminding staff and visitors to stick to marked pedestrian walkways.  
Ensure training is given to all drivers that use the market on the correct procedures. | Manager | date | date |
| --- | --- | --- | --- | --- | --- |
| Vehicle activity in the Market and within Chill-stores. | Staff and visitors may suffer life-threatening injuries that can be caused to staff or visitors if struck by lift trucks (FLTs) or other materials handling equipment (MHE). | • Separate entrances to the market hall and storage areas for pedestrians and vehicles.  
• Good lighting.  
• Mirrors at the end of aisles.  
• Drivers trained on the hazards and how their actions can impact on them.  
• Drivers have correct training to operate these items of machinery. | Review driver performance to ensure they are still competent.  
Keep a log of any near misses or accidents to ensure that current precautions are adequate. | manager | date | date |
<p>| Slips and Trips | Staff and visitors may suffer injuries that result from slipping on | • Good housekeeping requirements issued and checked by clean as you and regular cleaning regimes. | Review cleaning regime to see if this can be enhanced. | manager | date | date |</p>
<table>
<thead>
<tr>
<th>Manual Handling</th>
<th>Staff and visitors may suffer injuries that result from carrying, lifting or moving fish or equipment.</th>
<th>• All staff are trained in how to handle and move the catch and equipment correctly.</th>
<th>Review this training is up to date for the market environment.</th>
<th>manager</th>
<th>date</th>
<th>date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Working in a refrigerated environment</td>
<td>Staff and visitors may suffer may experience discomfort by working in a chilled environment for extended periods of time.</td>
<td>• All staff are provided with the correct PPE to ensure that they are insulated from these chilled temperatures.</td>
<td>No further action.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Noise</td>
<td>Staff and visitors may suffer may experience discomfort by working in a noisy environment for extended periods of time</td>
<td>• All staff are provided with the correct PPE to ensure they are insulated from these noisy conditions.</td>
<td>No further action</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Electricity</td>
<td>Staff and visitors may suffer electric shocks</td>
<td>• All electrical equipment and installation are checked in accordance with a</td>
<td>No further action</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>planned schedule.</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>-------------------------------</td>
<td>----------------------------------------------------------------------------------</td>
<td>----------------------------------</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Staff are instructed to report any damaged electrical installation to the market manager.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| Fire                          | Staff and visitors may suffer injuries that result from fires, such as burns and smoke inhalation. |                                 |
|                               | • A separate fire risk assessment is conducted on an annual basis and all actions are undertaken. | No further action                 |
Appendix 2C: Manual Handling Assessment Form (Example)

This example risk assessment form provides a template which must be completed for all manual handling tasks where it is considered that the task places an employee or market user at risk of injury. If the load is considered small and light enough to be moved safely by one person repetitively without risk of sprain or strain, then it is not necessary to complete this form. This assessment should be carried out with the aid and consultation of the operatives.

LOCATION:

Describe task:

SECTION 1

Can the manual handling task be avoided?

- by rearranging work procedures
- by rearranging storage areas
- by automating the process
- other

If yes box marked at any of the above, specify requirements, ensure implementation and finish assessment by completing Section 8.

If all no boxes ticked continue assessment. (Tick relevant boxes)

SECTION 2

The load:

- is heavy
- is bulky
- is of an awkward shape
- is of large size
- has uneven weight distribution
- is hot /cold to touch
- is slippery
- is liable to shift (liquid/animate)
- has sharp edges
- has other hazard potential

The task involves:

- twisting
- reaching
- stooping
- bending
- lifting whilst seated
- holding/moving loads away from trunk
- lifting above head height
- excessive lowering distances
- excessive carrying distances
- repetition of movement
- a rate of work imposed by a process
- other hazardous factors

**STATE LEVEL OF RISK ASSIGNED TO THIS TASK**

<table>
<thead>
<tr>
<th>LOW</th>
<th>MED</th>
<th>HIGH</th>
</tr>
</thead>
</table>

**AT PRESENT WITHOUT ANY FURTHER RISK REDUCING MEASURES;**

Can the risks from the hazards identified by ticks in the yes boxes of section 2 be reduced by;

- ordering smaller sizes/weights of product/load?
- dividing the load into more manageable and lighter sections?
- protecting hazardous areas of load (padding, packing etc.)?
- the assistance of colleagues?
- the introduction of mechanical aids (sack truck, trolley, hoist, etc.)?
- rearranging the task procedures?
- the provision of personal protective equipment (hand, foot, head, other)?
- introducing rest periods?
- any other means?

**SPECIFY ACTIONS TO BE TAKEN TO REDUCE RISK BY METHODS DENOTED BY CROSSES IN YES BOXES ABOVE:**

**SECTION 3**

Has the operator(s) read, of the Market Health and Safety Policy?

If No please ensure their attention is drawn to this information.

Is special instruction or training required in respect of;

- lifting techniques?
- to operate mechanical aids?
- slinging techniques?
- load type or content?
- other specific risk reduction?

Where the need for specialist training has been identified is this to be carried out;

- in-house by a competent person?
- by an external specialist agency?
It should be noted that certain mechanical aids (e.g. Fork lifts, Hydraulic platforms, etc.) may only be operated by persons who have received specialist training and hold the relevant certification.

**SECTION 4**
Are there any features of the work environment which may increase the risk factors of the task? Such as:
- space constraints
- uneven or slippery floors
- stairs/steps/ramps to negotiate
- extremes of temperature
- poor lighting
- ventilation problems
- gusts of wind
- other

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Can the risk from factors highlighted in Section 4 be reduced by:
- reorganising area layout
- introducing mechanical aids
- increasing number of operatives
- building/maintenance work
- use of alternative route
- introducing rest periods
- providing protective clothing
- other means

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**SPECIFY ACTIONS TO BE TAKEN TO REDUCE RISK BY METHODS DENOTED BY CROSSES IN YES BOXES ABOVE:**

---

**SECTION 5 (a)**
Does any operative have an existing medical, or age, condition which may be adversely affected by performing the task? Such as:
- previous muscular/skeletal injuries
- respiratory problems
- pregnancy or recent childbirth
- age
- other

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

If any of the questions in Section 5(a) results in a Yes response it is suggested that the operative(s) should not be required to perform this task, without first consulting the Occupational Health Unit.
SECTION 5 (b)
Is any item of clothing worn by a proposed operative likely to increase the risk of injury? Such as;

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>good clothing / dirty load</td>
<td></td>
</tr>
<tr>
<td>loose jewellery/other items</td>
<td></td>
</tr>
<tr>
<td>other</td>
<td></td>
</tr>
</tbody>
</table>

If any question in Section 5(b) attracts a yes response appropriate action should be taken to ensure reduction of risk. Such as;

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>remove item of risk (if practicable)</td>
<td></td>
</tr>
<tr>
<td>provide coveralls</td>
<td></td>
</tr>
<tr>
<td>have another operative carry out task</td>
<td></td>
</tr>
<tr>
<td>ensure wearing of appropriate clothing</td>
<td></td>
</tr>
</tbody>
</table>

SECTION 6

**SUMMARY ACTIONS TO BE TAKEN TO REDUCE RISK BY METHODS DENOTED BY CROSSES IN YES BOXES OF ALL SECTIONS ABOVE:**

---

SECTION 7

**DETAILS OF THE SAFE SYSTEM OF WORK RELAYED TO OPERATIVES (METHOD BY WHICH THEY ARE TO CARRY OUT THE TASK WITH THE MINIMUM OF RISK – SEE SSW FORM AT END OF ASSESSMENT)**

---

**STATE LEVEL OF RISK ASSIGNED TO THIS TASK**

<table>
<thead>
<tr>
<th>LOW</th>
<th>MED</th>
<th>HIGH</th>
</tr>
</thead>
</table>

**AFTER IMPLEMENTATION OF THE RISK REDUCTION MEASURES TAKEN AS A RESULT OF THIS RISK ASSESSMENT**

**IS SUCH RISK LEVEL DEEMED TO BE AT THE LOWEST LEVEL REASONABLY PRACTICABLE?**

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
</table>

**IF NO, STATE REASON FOR ACCEPTANCE OF A HIGHER LEVEL OF RISK (E.G. TEMPORARY WHILST AWAITING BUILDING WORKS OR FINANCE):**

---

SECTION 8

**THIS ASSESSMENT SHOULD BE REVIEWED ON [INSERT DATE] OR IMMEDIATELY IF ANY OF THE ABOVE CIRCUMSTANCES CHANGE.**

<table>
<thead>
<tr>
<th>Assessor</th>
<th>Signature</th>
<th>Date</th>
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RFPS Code of Practice - June 2018
SECTION 9
Once all risk reducing measures required to be taken as a result of this assessment are addressed and implemented, a written safe system of work (as outlined in Section 7) should be documented on the appended Safe System of Work (Manual Handling Operations) form and a copy of that form given to the operative. His/her signature should be appended to the master copy which should be kept on file along with this risk assessment.

WHEN COMPLETED, THIS FORM SHOULD BE RETURNED TO YOUR SAFETY ADVISER/LINE MANAGER FOR ANY NECESSARY ACTION OR FILING.

Your duties may require your involvement in the task described below, which contains within it certain hazardous elements of manual handling that have the potential to cause injury. This task has been subject to risk assessment and the following Safe System of Work developed to ensure that, if followed, the risk of injury is reduced to the lowest level reasonably practicable.

**TASK DESCRIPTION:**

<table>
<thead>
<tr>
<th>Location(s):</th>
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</table>

Safe System of Work:

<table>
<thead>
<tr>
<th>List any mechanical aids (e.g. trolleys) that must be used:</th>
</tr>
</thead>
</table>

I understand that I may be involved in the manual handling task covered by this safe system of work. I have read the above prescribed safe system of work, which I fully understand, and hereby undertake to adhere to in the interest of my own health and safety and that of others who may be affected by my actions.

<table>
<thead>
<tr>
<th>NAME</th>
<th>SIGNATURE</th>
<th>DATE</th>
</tr>
</thead>
<tbody>
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Appendix 2D: Employee Contracts

Minimum work agreement / contract requirements

The Employee’s work agreement shall be in a language appropriate for the respective member of staff and shall contain the following particulars (except if the inclusion of one or more of them is rendered unnecessary by UK national laws or regulations, or a collective bargaining agreement where applicable):

1. The Employee’s family name and other names, date of birth or age, and birthplace;
2. The place and date on which the agreement was concluded;
3. The name of the port which the employee undertakes to work;
4. The name of the employer, or other party to the agreement with the employee;
5. The work schedules to be undertaken, if this can be determined at the time of making the agreement;
6. The capacity in which the employee is to be employed or engaged;
7. The amount of wages, and the method of calculation, and any agreed minimum wage;
8. The termination of the agreement and the conditions thereof;
9. If the agreement has been made for a definite period, the date fixed for its expiry;
10. If the agreement has been made for an indefinite period, the conditions which shall entitle either party to rescind it, as well as the required period of notice for recession, provided that such period shall not be less for the employer, or other party to the agreement with the employee;
11. The protection that will cover the employee in the event of sickness, injury or death in connection with service;
12. The amount of paid annual leave or the formula used for calculating leave, where applicable;
13. The health and social security coverage and benefits to be provided to the employee by the employer, or other party or parties to the employee’s work agreement, as applicable;
14. A reference to the collective bargaining agreement, where applicable;
15. The minimum periods of rest, in accordance with national laws, regulations or other measures; and
16. Any other particulars which national law or regulation may require.
Appendix 2E: Seafish Training Programs

Seafish Training Programmes: Supporting Responsible Fish Ports Scheme

Overview
Seafish and the Seafood Training Academy provide a range of compliance training courses regulated by the Royal Environmental Health Institute of Scotland (REHIS). Such compliance training includes food hygiene at Introductory, Elementary and Intermediate levels, equivalent to Levels 1-3. Health and safety training at Introductory and Elementary levels are also available. A mix of taught, open learning and eLearning routes is used. As a general guide, we recommend Introductory Level Food Hygiene for all food handlers on a market other than team leaders and supervisors (Elementary Level) and Managers (Intermediate or Advanced as appropriate).

Seafish Compliance Programmes.
- **Introductory** Food Hygiene in the seafood industry:
  - A half-day taught course deliverable in English, Latvian, Lithuanian, Polish, Portuguese, Russian and Spanish.
- **Elementary** Food Hygiene:
  - Available as a taught course in English.
  - Available as an eLearning programme in English.
  - Available as an Open Learning programme in English, Lithuanian, Polish and Portuguese.
- **Intermediate** Food Hygiene:
  - Available as an eLearning programme in English.
- **Introduction to HACCP** in the seafood Industry:
  - A half-day taught course in English.
- **Introductory Health & Safety**:
  - A half-day taught course in English
- **Elementary Health & Safety**:
  - Available as an Open Learning programme in English.

Other Seafish programmes
**Introductory quality assessment**: a half day (up to 1 full day) taught course that covers fish quality, spoilage and some handling. All taught courses are delivered by Seafish approved trainers. Seafish is able (within limits) to develop bespoke courses and programmes for fish and shellfish businesses in the UK.
For more information on training, study guides online learning resources please visit [www.seafoodacademy.org](http://www.seafoodacademy.org) and search for the prospectus.
Appendix 2F: Code of conduct and Supplier agreements

The following is an example taken from Venite’s online toolkit which is available online. Go to https://www.responsiblesourcingtool.org/resources/seafoodindustry
download Tool01 and Tool02
PROTETIONS AGAINST TRAFFICKING IN PERSONS
Sample Code of Conduct Provisions for Seafood Supply Chains

HUMAN TRAFFICKING

A supply chain Code of Conduct establishes basic performance expectations for subcontractors, suppliers and agents. It is important that your company’s sourcing policy or Code of Conduct explicitly prohibits human trafficking and sets out protections for workers. The sample provisions below can be used by any company, including federal contractors and their subcontractors, as they consider how best to create, strengthen or revise their own supply chain policies. These high level provisions can be used for companies in any sector, including seafood.

The __________ Company strictly prohibits human trafficking in all of our operations and in those of all subcontractors, suppliers and agents in our global supply chain. Workers shall not be subject to any form of forced, compulsory, bonded, or indentured labor. All work must be voluntary and workers shall have the freedom to terminate their employment at any time without penalty, upon giving reasonable notice.

RECRUITMENT FEES AND TRANSPORTATION EXPENSES

Workers shall not be charged any fees or costs for recruitment, directly or indirectly, in whole or in part, including costs associated with travel to the receiving country, and processing official job-related documents and work visas in both home and host countries. Workers shall be provided with return transportation to their country of origin, or compensation for the cost of return transportation, upon completion of their employment contract.

CONTRACTS OF EMPLOYMENT

Written contracts of employment shall be provided to migrant workers in their native language, clearly indicating their rights and responsibilities and conditions of employment, including wages, benefits, working hours, locations of the work, living conditions, housing and associated costs, work-related hazards, and other working and employment conditions. Migrant workers shall be provided with a copy of their employment contract at least five days prior to deployment in their native language. Workers with difficulty understanding the written contract shall be given a verbal explanation of the contract’s terms and conditions. The use of supplemental agreements and the practice of contract substitution or use of supplemental agreements by the employer to replace an original contract or any of its provisions with a new contract or terms that are less favorable to the worker is strictly prohibited. The required notice period for workers to terminate their contracts early shall not exceed one month, and once they have begun working,
migrant workers shall not be penalised for early termination of their employment contract upon giving the required notice. The notice period shall be waived in situations where the worker has suffered harassment or abuse, or is a victim of trafficking in persons. In such cases the employer shall also be responsible for paying the cost of return transportation for the affected worker.

**RETENTION OF PERSONAL DOCUMENTS**

Confiscating, destroying, withholding or otherwise denying workers access to their identity or immigration documents, including work permits and travel documentation (e.g. passports), is strictly prohibited. Workers must be provided with individual secure and lockable storage facilities for their identification documents and other valuables that are accessible to them at all times.

**DEPOSITS**

Migrant workers shall not be required to lodge monetary deposits or security payments, or have a portion of their pay withheld at any time as a condition of obtaining or retaining employment.

**HUMANE TREATMENT**

The workplace shall be free of any form of harsh or inhumane treatment. Disciplinary policies and procedures shall be clearly defined and communicated to all workers, and shall not include any inhumane disciplinary measures, including any corporal punishment, mental or physical coercion, or verbal abuse of workers. The use or threat of physical or sexual violence, harassment and intimidation against a worker, his or her family, or close associates, is strictly prohibited. Disciplinary procedures shall not include sanctions that result in wage deductions, reductions in benefits, or compulsory labor.

**WORKPLACE EQUALITY**

All workers, irrespective of their nationality or legal status, shall be treated fairly and equally. Migrant workers shall benefit from conditions of work no less favorable than those available to country nationals (including but not limited to wages, benefits, and accommodations). Migrant workers (or their family members) shall not be threatened with denunciation to authorities to coerce them into taking up or maintaining employment.

**WAGES AND BENEFITS**

All workers shall be paid at least the minimum wage required by applicable laws, and shall be provided all legally mandated benefits. Wage payments shall be made at regular intervals and directly to workers, in accordance with applicable law, if any, and shall not be delayed, deferred, or withheld. Only deductions, advances, and loans authorized by national law are permitted and, if made or provided, shall only be taken with the full consent and understanding of workers. Information shall be provided to workers at the time of their hire about hours worked, rates of pay, etc.
and the calculation of legal deductions.

All workers must retain full and complete control over their earnings. Wage deductions must not be used to keep workers tied to the employer or to their jobs. Workers shall not be held in debt bondage or forced to work in order to pay off a debt. Deception in wage commitments, payment, advances, and loans is prohibited.

**WORKING HOURS**

Workers shall not be required to work in excess of the number of hours permitted by national law. Where the law is silent, normal working hours shall not exceed eight hours per day and 48 per week, and total working hours including overtime shall not exceed 60 hours. All overtime shall be purely voluntary, unless part of a legally recognized collective bargaining agreement. No worker shall be made to work overtime under the threat of penalty, dismissal, or denunciation to authorities. No worker shall be made to work overtime as a disciplinary measure, or for failure to meet production quotas.

**FREEDOM OF MOVEMENT AND PERSONAL FREEDOM**

Workers shall have unrestricted access to basic necessities such as clean drinking water and toilets during both work and non-work hours at the work site or in employer-provided or arranged housing.

Workers' freedom of movement shall not be unreasonably restricted. Workers shall not be physically confined to the workplace or related premises, such as employer- or recruiter-operated residences; nor shall any other coercive means be used to restrict workers' freedom of movement or personal freedom.

Mandatory residence in employer-provided or arranged facilities shall not be made a condition of employment unless required by law.

**GRIEVANCE PROCEDURES**

An effective, confidential grievance process shall be established to ensure that any worker, acting individually or with other workers, can submit a grievance without suffering any prejudice or retaliation of any kind. The grievance procedure shall include an appeals process for workers who disagree with how a grievance is resolved.

Grievance mechanisms shall be available in the worker's native language and include the ability to report grievances anonymously.

**PRIVATE EMPLOYMENT AGENCIES AND LABOR RECRUITERS**

Companies should hire workers directly whenever possible. When the subcontrasting of recruitment and hiring is necessary, companies shall ensure that the labor agencies they engage operate legally, are certified or licensed by the competent authority in their country of operation, do not charge recruitment fees, use only trained employees, and do not engage in fraudulent recruitment practices that place workers at risk for human trafficking and sexual exploitation.
EMPLOYEE AWARENESS AND TRAINING

Workers must be made aware of their rights and responsibilities at the time of hire, including the terms and conditions of their employment contract, the provisions of this Code and all applicable laws and regulations of their home country, the country where the work is performed, and of any country and jurisdiction contracting the work.

Workers must be trained upon arrival in the receiving country on the company’s workplace rules and procedures, the grievance process, the housing arrangements (if provided or arranged by the company), and the conditions of work, including any health and safety hazards and the precautions needed to ensure personal safety. Workers should be informed that the company prohibits the procurement of commercial sex.
PROTECTIONS AGAINST TRAFFICKING IN PERSONS
Sample Social Responsibility Agreement for Seafood Supply Chains

The purpose of a “Social Responsibility Agreement” is to formally record the commitment of a subcontractor, supplier or agent to conform to a customer’s code of conduct and applicable legal requirements. It can be a standalone document or included as an appendix to a contract.

The following sample Social Responsibility Agreement is not designed to ensure compliance with specific legal requirements, such as the Federal Acquisition Regulation (FAR). Specific compliance requirements should be detailed in the terms and conditions of contracts with subcontractors, suppliers and agents.

This Social Responsibility agreement (“Agreement”) is dated this [day] of [month], [year] by and between ______________ Company, [address] (the “Company”) and [name & corporate address of supplier/subcontractor/agent] (“Supplier”).

Rationale
A. This Agreement is intended to supplement any and all contracts and agreements between the Company and Supplier for the supply of goods or services by Supplier to the Company.
B. The Parties wish to address in this Agreement how they may work collaboratively to achieve the objectives of the ______________ Company Supply Chain Code of Conduct (Appendix 1).

Now therefore, the Parties agree as follows:

1.0 SUPPLIER RESPONSIBILITY

1.1 Supplier confirms that it has read the Company Supply Chain Code of Conduct, agrees with its statement of requirements and commits to comply with them.

1.2 Supplier will complete the Company Supplier/Subcontractor Self-Assessment questionnaire available at [URL for supplier/subcontractor access to SAC]

1.3 Supplier will be responsible for identifying any areas of its operations that do not conform to the Company’s Supply Chain Code of Conduct and for implementing and monitoring improvement programs designed to achieve conformance with the Company Supply Chain Code of Conduct.

1.4 Upon request by the Company, Supplier will submit a report to the Company describing actions taken and progress made by Supplier to meet the requirements of the Company Supply Chain Code of Conduct.

1.5 Supplier will provide the Company, or its nominated representative, on reasonable notice, access to Supplier’s production facilities, work sites and relevant records insofar as they relate to contracts and purchase agreements with the Company, in order to verify information provided in Supplier’s report.
2.0 COMPANY RESPONSIBILITY
The Company agrees that the report (Section 1.4 above), site access and records referred to will only be used for the purposes of assessing the Supplier’s progress in accordance with the Company’s Supply Chain Code of Conduct and will not be disclosed to any third party without Supplier’s prior written consent, unless otherwise required by law.

3.0 SCOPE OF AGREEMENT
3.1 This Agreement applies to all existing and future contracts and purchase agreements between Supplier and the Company.
3.2 This Agreement will remain in force so long as there are any contracts in force. This Agreement will terminate when and if no contract is in force.
3.3 This Agreement does not require either the Company or Supplier to enter into any contract nor to enter into any new or further agreement of any kind.

PARTIES SIGNED

for and on behalf of _______________ Company  for and on behalf of Supplier:

Signature: ________________________________  Signature: ________________________________

Name: ________________________________  Name: ________________________________

Position: ________________________________  Position: ________________________________

Date: ________________________________  Date: ________________________________
Module 3 - Care of Environment

3.1 Introduction
The aim of this module is to encourage a culture of respect for the protection of the environment. Aspects covered are waste management, recycling and environmental controls.

Legislation
- The main legislation includes the following:
  - The Merchant Shipping and Fishing Vessels (Port Waste Reception Facilities) Regulations 2003, as amended;
  - The Merchant Shipping (Prevention of Pollution by Sewage and Garbage from Ships) Regulations 2008, as amended;
  - Food Safety (General Food Hygiene) Regulations 1995 Chapter V Food Waste;
  - The Food Safety and Hygiene (England) Regulations 2013 (as amended)
  - Regulation (EC) No. 852/2004 on the hygiene of foodstuffs;
  - Regulation (EC) No. 853/2004 laying down specific hygiene rules for food of animal origin;
  - Environmental Protection Act 1990, Part II - Receptacles for commercial or industrial waste.

Environmental considerations will differ for each category of port depending on the types of activities carried out, see table below; for example, environmental considerations will be more numerous for level 3 or 4 ports and their premises which land, handle, store and organise disposal of wastes, compared with a level 1 port where product is only landed.

<table>
<thead>
<tr>
<th>Environmental considerations</th>
<th>Category of Port</th>
</tr>
</thead>
<tbody>
<tr>
<td>Waste management plan</td>
<td>Level 1</td>
</tr>
<tr>
<td>Disposal of solid wastes (fishery products)</td>
<td>P, F</td>
</tr>
<tr>
<td>Disposal of solid wastes (vessels generated)</td>
<td>P, F</td>
</tr>
<tr>
<td>Disposal of liquid wastes</td>
<td>P, F</td>
</tr>
<tr>
<td>Recycling provision</td>
<td>P</td>
</tr>
<tr>
<td>Environmental controls</td>
<td>P</td>
</tr>
</tbody>
</table>

Key: F = Fishermen; P = Port Client Group
To help achieve the aims of this module, all ports that ‘process' waste require an Environmental Policy Statement (EPS) to cover their waste management, recycling and environmental controls. Each policy will vary according to the different activities undertaken by the port; however, areas that require to be covered include:

- acting in a law abiding manner for all environmental laws;
- co-operating with regulatory authorities in pursuit of responsible management of the port;
- taking all reasonable efforts to minimise waste, pollution (and emissions);
- providing training and support to encourage port operatives to actively support the environmental policy of the port; and
- ensuring the port is well maintained and that any waste produced (including disused fishing gear) is disposed of or recycled where possible, in accordance with their Waste Management Plan (WMP).

An example of a generic environmental policy that can be adapted to meet your environmental commitments is provided in the Appendix 3A.

### 3.2 Waste management and waste disposal

Legislation regarding the disposal of trade wastes places restrictions on the disposal of both solid and liquid wastes. Port Authorities **must** submit and obtain approval for their plans for the disposal of wastes generated by fishing vessels and provide facilities for its disposal. These plans are known as “Port Waste Management Plans” and are required by the Merchant Shipping and Fishing Vessels (Port Waste Reception Facilities) Regulation 2003 (as amended) and the EU Directive 2000/59/EC, as amended.

The Marine and Coastal Access Act 2009 controls marine activities through a system of marine licencing. Fish, including shellfish and fish waste (fish body parts) taken from the sea by a fishing vessel during normal fishing operations and subsequently returned to the sea by the vessel is exempt from this licencing requirement. The details relating to this exemption are contained in the Marine Licence (Exempted Activities) Order 2011. Fish and fish waste landed and taken back to sea for disposal or deposition does not constitute an exempt activity and would require a marine licence. Although fish and fish waste (fish body parts) taken from sea by fishing vessel in the course of normal fishing operations and returned to the sea from the vessel is exempt from licence control, such waste is only licensable if taken back to sea for disposal or deposited into the sea after it has been landed.

Enforcement of legislation regarding disposal of trade waste on land is generally dealt with by local government authorities. The Maritime and Coastguard Agency (MCA) is responsible for compliance with the preparation of waste management plans.
plans and the provision of port waste reception facilities. Matters concerning the
discharge of effluents from ports/harbours to controlled waters are dealt with by the
Environment Agency in England and Wales, the Scottish Environmental Protection
Agency in Scotland and the Dept. of Environment (Northern Ireland.)

Matters relating to the discharge of effluent to public sewers are dealt with by the
Water Companies in England and Wales, the Public Water Authorities in Scotland
and the Dept. of the Environment in Northern Ireland. Control of disposal of specified
forms of animal waste (including fish) is the responsibility of the Local Authority.

**Legislation**


The Water Act 1989 was consolidated by the Water Resources Act 1991 and the Water Industry Act 1991, the latter setting out the legal requirements for consent to discharge into a public sewer. In Northern Ireland, the equivalent is the Water (Northern Ireland) Order 1999 and the Water and Sewerage Services (Northern Ireland) Order 2006. Environmental Protection Act 1990, Part II covers Receptacles for commercial or industrial waste.

**Waste Management Plan (WMP)**

Ports are required legally to have a WMP that must be approved by the MCA at the
designated frequency.

- All ports must have a valid WMP and be able to provide a copy of their current
  WMP which has been approved and signed.
- The WMP must be reviewed at each new approval stage.
- Where appropriate, all waste must be categorised according to its legislative
  requirements based on the intended means of disposal (such as recycling) and
  segregated in appropriate designated waste containers.
• Licensed waste carriers **must** be used for the removal of waste from the port premises.

**Solid Waste Requirements**

• Provision **must** be made for the storage and disposal of solid wastes generated at the port facilities and landing quays, and this must also include solid waste material landed by fishing vessels.

• Separate provision should be made available for waste material derived from the seafood products and that derived from other solid wastes (garbage, packaging materials, nets and gear etc).

**Waste seafood products requirements**

• All waste **must** be eliminated in a hygienic and environmentally friendly way in accordance with Community legislation applicable to that effect, and must not constitute a direct or indirect source of contamination.

• Lidded leak-proof containers that can be cleaned easily **must** be provided for storage of waste seafood products, unless food business operators can demonstrate to the competent authority that other types of containers or evacuation systems used are appropriate.

• The containers should be marked clearly according to the category of animal by product contained and, where necessary, marked as 'waste unfit for human consumption' and be used solely for that purpose, see Appendix 3B.

• Where such waste is not collected at least daily, it is recommended that the containers be stored in an environment that provides protection from the elements, vermin and insects. If the waste is to be processed for animal foodstuffs or for pharmaceutical purposes, the containers should be stored, ideally, under chilled conditions.

• Adequate provision **must** be made for the storage and disposal of food waste non-edible by-products and other refuse. Refuse stores **must** be designed and managed in such a way as to enable them to be kept clean and, where necessary, free of animals and pests and should be separate from catch handling and storage areas. Refuse stores should be of adequate capacity, hygienically constructed, well lit, provided with water for cleaning purposes and be well drained. Where there is no market for waste seafood products, advice should be sought from the Local Authority on the most suitable means of disposal.

• Food waste, non-edible by products and other refuse **must** be removed from catch-handling areas as soon as possible and not allowed to build up. Food waste should be collected in bins that have tight fitting lids and are easy to clean.
• Provision **must** be made for the storage of any Animal By-products (ABP), especially those arising from the Common Fishery Policy controls (landing obligation).

• Animal By-Products (ABPs) **must** be disposed of or processed without undue delay via a route permitted by its category and the legislation. Any establishments or plants the waste is sent to **must** be approved by the Animal and Plant Health Agency (APHA).

• Transporters must register with the APHA unless the transporter works for a site that is already approved or registered.

• If moving consignments of ABP, ports shall ensure every ABP load is accompanied during transport by a ‘Commercial Document’ and records of such document kept for at least two years. See guidance https://www.food.gov.uk/sites/default/files/chapter-2.8.pdf

**Fishing Vessel landed and other port operational waste**

• Ports **must** provide adequate reception facilities to receive the types and quantities of waste from ships normally using the harbour or terminal, without undue delay.

• Where the scale of operations warrants, large lidded industrial skips should be used for disposal of fishing vessel-landed solid wastes, located conveniently to lay-by and service berths with easy access for collection. Where the public has site access and their use of such facilities causes nuisance, it may be necessary to restrict and monitor access to skips.

• For smaller quantities of solid wastes, wheeled lidded bins of hygienic construction are recommended. Wheeled bins located exterior to a building, particularly near quays, should be fitted with brakes and be well secured.

• Where large quantities of paper and packaging materials are generated, a compactor is recommended to reduce the costs of disposal.

**Liquid wastes**

• Waste-waters, including those generated from cleaning operations, ice melt-water, live shellfish (vivier) transport, and staff facilities, should be discharged to a public sewer or disposed of by other approved hygienic means. Discharging liquid wastes directly into harbours is not permitted, unless approved by the local authority eg. Environment Agency or Scottish Environmental Protection Agency (SEPA).

• Consent to discharge to a public sewer is required from the ‘appropriate authority’ who will levy a charge dependent on the volume and strength of the effluent.
• Provision **must** also be made for the storage and disposal of spent lubricating oils landed by fishing vessels. Storage should be well away from catch landing, handling and storage areas to avoid contamination or tainting of seafood product. Provision must be made to contain the total volume of oil to mitigate the risk of spills or leaks from containers.

• In certain circumstances, (e.g. for a level 1 and 2 port) a discharge consent may be required by the Environment Agency, or equivalent body, to discharge (e.g. quayside washings) to local waters. In practice, exemptions may be given for small-scale discharges to local waters, depending upon the sensitivity of the waters but this is not the case for large-scale discharges. Large-scale discharges would require an application to the Environment Agency, SEPA or NI Environment Agency for consent to discharge. In the first instance, preliminary advice should be sought from the relevant Agency, to assess the necessity of such consent on more of a case by case basis.

**Recycling**

• To complement the WMP, ports should have an environmental policy statement, see Appendix 3A. Specific aims of the policy will be to:
  - Develop a high level of awareness in relation to waste minimisation and recycling within the premises.
  - Maximise opportunities to recycle materials; e.g., landed netting and other reusable materials.
  - Accommodate disposal of recyclable litter from fishing vessels; and
  - Accommodate ‘waste’ from the RFS ‘Fishing for Litter’ scheme.

• Ports should develop an appropriate recycling plan that aligns with their recycling policy statement.
3.3 Environmental Controls

- The port must have a documented policy and records of permits for environmental emissions regulations as the legislation relates to:
  - Emissions to air
  - Discharge to water
  - Release of toxic or hazardous substances
  - Noise, smell and dust pollution
  - Ground pollution

Discharges to water and release of toxic or hazardous substances require discharge consents from SEPA, the EA or the NIEA to discharge any pollutant to coastal waters. It is down to the port/harbour to prove that what they discharge is not a pollutant in order to be classified as exempt.

- The port must maintain records of any non-compliance with their environmental plan with process to action future plans to monitor and address these areas of non-compliance.

- The port shall have conducted and written an environmental risk-assessment that identifies relevant environmental issues and the provisions made to address the associated risks have been conducted. The port management needs to be able to demonstrate awareness of the identified issues and the provisions made to address the associated risks.

- Ideally, a port should review its energy use on an annual basis to identify possible savings, reduce its carbon footprint and be aware of statutory requirements regarding greenhouse gas emissions depending on the size of the company.

- The port should have a conducted an evaluation of the potential impacts of their operations on the local community. This would help to reassure the local community and improve community relations and promote the port as a responsible and professional operator.
Appendix 3A: Environmental Policy Statement examples

Examples of Environmental Policy Statements:

“This port will develop its existing Environmental Policy Statement by minimising the production of waste through the reuse and recycling of materials, and the use of sustainable purchasing strategies.”

“XYZ Limited is committed to leading the industry in minimising the impact of its activities on the environment.

The key points of its strategy to achieve this are:

- Minimise waste by evaluating operations and ensuring they are as efficient as possible.
- Minimise toxic emissions through the selection and use of its fleet and the source of its power requirement.
- Actively promote recycling both internally and amongst its customers and suppliers.
- Source and promote a product range to minimise the environmental impact of both production and distribution.
- Meet or exceed all the environmental legislation that relates to the Company.
- Use an accredited program to offset the greenhouse gas emissions generated by our activities.

Signed by: “Senior Director of company.”
Appendix 3B – Animal By-Product guidance

During transport and storage, a label attached to the packaging, container or vehicle must:

(a) clearly indicate the category of the animal by-products or of the derived products; and

(b) bear the following words visibly and legibly displayed on the packaging, a container or vehicle, as applicable:

(i) in the case of Category 3 material, ‘not for human consumption’;

(ii) in the case of Category 2 material (other than manure and digestive tract content) and derived products from Category 2 material, ‘not for animal consumption’; however, when Category 2 material is intended for the feeding of animals referred to in Article 18(1) of Regulation (EC) No 1069/2009 under the conditions provided for or laid down in accordance with that Article, the label shall instead indicate ‘for feeding to …’ completed with the name of the specific species of those animals for the feeding of which the material is intended;

(iii) in the case of Category 1 material and derived products from Category 1 material where they are destined for — disposal, ‘for disposal only’; 26.2.2011 Official Journal of the European Union L 54/53 EN— the manufacture of pet food, ‘for manufacture of pet food only’;

— the manufacture of a derived product referred to in Article 36 of Regulation (EC) No 1069/2009, ‘for manufacture of derived products only. Not for human or animal consumption or for application to land’
Module 4: Care of the Catch

4.1 Introduction
This module is concerned with the handling of fresh seafood and maintenance of quality. Aspects covered include grading and catch handling, and temperature control (quality maintenance).

Considerations relating to caring for the catch will differ for each category of port depending on the types of activities carried out, see table below; for example, at a level 1 facility the care of the catch is still under the control of the fisher so would be reviewed as meeting industry good practice by the RFS standard, whereas ‘quality’ considerations will be more numerous for level 3 or 4 premises which land, handle and store fish.

<table>
<thead>
<tr>
<th>Care of Catch considerations</th>
<th>Category of Port</th>
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<tbody>
<tr>
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<td>Level 1</td>
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<tr>
<td>Grading</td>
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<tr>
<td>Temperature control</td>
<td>F</td>
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</tbody>
</table>

Key: F = Fishermen; P = Port Client Group

Legislation

Food hygiene:
Regulation 852/2004 (as amended) – food hygiene requirements:

- Develop, implement and maintain procedures based on HACCP principles.
- Approval of establishments.
- Food handlers supervised and instructed and/or trained in food hygiene commensurate with their work activity.

Regulation 853/2004 (as amended) – requirements during and after landing

- Avoid contamination during landing and in particular:
  - carry out landing rapidly.
  - place fish in a protected environment at specified temperature.
  - do not use practices and equipment that causes unnecessary damage.
- During display and storage:
  - premises must not be used for other purposes.
  - no access to vehicles emitting exhaust fumes likely to impair quality.
  - no introduction of animals.
- Fish not chilled (other than live) must undergo chilling as soon as possible after landing.
- Store at temperature of melting ice.
- Co-operate with competent authorities to permit verification of official controls
Food safety:
Regulation 178/2002 (as amended) – food safety requirements:

- Food must not be placed on the market if it is unsafe.
- Food is deemed to be unsafe if considered to be injurious to health or unfit for human consumption.

Marketing standards:
Regulation 2406/96 (as amended) - common marketing standards for fishery products:

- freshness ratings
- size categories

Fisheries Control:
Regulation 1224/2004 (as amended) - establishing a Community control system for ensuring compliance with the rules of the common fisheries policy:

- weighing of fishery products

Regulation 850/98 (as amended) - technical measures for the protection of juveniles of marine organisms:

- stipulates minimum sizes for marine species

Common Fisheries Policy – landing obligation applicable to discards:
Regulation 1380/2013 - Common Fisheries Policy:

- Establishes measures to reduce the current high levels of unwanted catches and to gradually eliminate discards.

Regulation 1069/2009 – health rules as regards animal by-products and derived products not intended for human consumption:

- Approval, storage and handling of fishery products not intended for human consumption
4.2 Fish Handling (food hygiene)

Physical handling

Fish handlers must be aware at all times that the fish they are handling is a food and must be treated accordingly. Fish must not be crushed, stood upon, dropped, thrown or otherwise roughly handled.

- Fish handling equipment should be designed and operated to minimise the risk of physical damage.

- Wherever possible, fish should be handled in containers that afford protection and take the strain of handling, rather than being handled directly.

- Large fish should not be bent or forced into boxes; they should be weighed, labelled and laid out on plastic pallets (on ice).

- Boxes should not be overfilled with ice; the level of ice should be below the rim of each box to prevent product from being crushed when boxes are stacked. The maximum height of each stack in the auction or selling area should take into account health and safety considerations, if stacked manually.

- Fish is a delicate foodstuff and physical handling of it should be minimised. The effects of careless handling and overfilling of boxes may not be apparent to those responsible at the time but will result in loss of quality and value. Poor handling and boxing practices not only cause obvious external damage but also internal damage such as broken backbones, bruising and bleeding. This can result in problems with machine filleting, loss of yield, increased costs of trimming and more rapid deterioration of product.

Hygienic handling and use of facilities

- Handling operations in the landing, handling and sale of fishery products should proceed as quickly as possible under hygienic conditions. This is to minimise the risk of contamination of product and temperature gain, particularly at exposed areas such as landing quays and open loading bays.

- Fish boxes containing fish should not be located directly on the floor in order to minimise risk of cross contamination, and the need to separate product from the floor should be identified through risk assessment (HACCP). Separation could be achieved through the use of physical barriers such as boxes, pallets or stands.

- Fishery products must not be left unprotected in the open; prior to any work-break, any fish left on the quay, conveyor belts or grading tables etc. should be cleared. Fishery products should not be tipped from boxes onto the market floor for inspection.
• Landings should be made only to a designated quay or site that is maintained in a hygienic condition. Operations such as shot-blasting, paint spraying and handling of dusty cargoes etc. that might cause contamination or tainting of product should not be permitted on or near fish handling areas and fish should not be landed to such areas. Where landings are made for collection by road transport and no hygienic storage facility is available, it is recommended that the fish is retained on board in the fish-room until transport is available to receive it.

• Where mechanised equipment is used for unloading, handling, grading, weighing etc. of fishery products, it is important that it is used to the manufacturer’s instructions, particularly with regard to its rated capacity or speed of operation.

Boxes and pallets
• Distribution boxes and pallets intended for transporting seafood must be undamaged and fit for their intended use.

Cleaning and disinfection
• See Module 1 – Food Safety (Section 1.4 Cleaning and disinfection).

Personal hygiene
• See Module 1 – Food Safety (Section 1.5 Recommendations on Personal Hygiene; Section 1.6 Health Checks and First Aid).

• See Module 2 – Port and the working environment (Section 2.2 Improve skills and knowledge, and training provision).

Staff Training
• See Module 2 – Port and the working environment (Section 2.2 Improve skills and knowledge, and training provision).
4.3 Size Grading (marketing standards)

Size grades

- Size grading should be consistent and meet with a defined market specification
- EU marketing standards under Regulation 2406/96 provides size grades for different species. These are generally based upon weight (number per kilogram) but can be based upon size or on the basis of sampling.
- Where market requirements demand more precise grading than the EU grades provide, it is recommended that the EU grades be further sub divided where possible. If the grade bands do not conform, then advice should be sought from the relevant fisheries department.
- Minimum landing sizes for fish and shellfish are also prescribed by the EU and on a National basis. These can be found at: https://www.gov.uk/government/publications/minimum-fish-landing-sizes

Labelling

- The size category **must** be clearly and indelibly marked in characters which are at least 5 cm high on labels affixed to each lot.

Grading equipment used for sorting

- See Module 1 – Food Safety (1.3 Structural condition; 1.3.2 Internal).
4.4 Quality (food safety and marketing standards)

Quality grades
- Seafood **must** also be graded by freshness to EU specifications as prescribed under Regulation 2406/96. More precise categories may be used within these grades. Assigned freshness categories are: extra, A or B.

Labelling
- The freshness category **must** be clearly and indelibly marked in characters which are at least 5 cm high on labels affixed to each lot.

Monitoring quality
- In addition to statutory monitoring of fishery products undertaken by Environmental or Port Health Officers, all handlers of fishery products should monitor product to ensure it meets with quality standards. Particular attention should be paid to boats working longer trips and over-landed/imported supplies. Any doubt about products’ fitness should be reported to the food authority.

Weighing (fisheries control)
- All fish **must** be weighed using an approved and certified weighing system on landing before fish are sold or transported for sale or storage.

Other options include:
- Weighing a specified sample of the catch in accordance with the UK sampling plan for weighing catches in port.
- Transporting the catch to a registered auction in the UK where the catch may be weighed or sample weighed in accordance with the UK sampling plan.
- Transporting the catch direct to a private buyer, merchant or agent in the UK where the catch **must** be fully weighed on receipt at the premises in accordance with the UK control plan.
- Transporting the catch abroad to Belgium, France or Ireland in accordance with the UK’s common control programmes with these countries, providing that all fish is weighed at first marketing or storage.
- Weights **must** be available by time of first sale.
- Registered buyers, registered auctions or other bodies or persons responsible for the first marketing of fisheries products **shall** be responsible for the accuracy of the weighing operation unless the weighing takes place on board a fishing vessel.
• Additional information on record keeping is provided in Module 5 – Traceability

• All equipment **must** be calibrated in metric measure and **must** be of a type approved by Trading Standards Officers or their agents.
4.5 Temperature Control (Food Hygiene)

Temperature is the most important factor affecting the rate of deterioration of fishery products. To minimise quality loss, fresh fishery products must be maintained as close to zero degrees centigrade as possible through the landing, handling and sale operations. The best way of achieving this is by icing, supported, where necessary, by mechanical refrigeration.

As part of a Food Quality Management System to ensure adequate temperature control and that fish temperature will not be compromised, ports must have in place a Food Quality Management Plan (FQMP), specific to their own premises and appropriate to the nature, scope and volume of the production in accordance with the Scheme Standards and statutory legislation. Appropriate plans would be those based on the Hazard Analysis Critical Control Point (HACCP) system and would cover the structures involved, the systems and procedures in place, the responsibilities of personnel, and etc.

Approved premises must have in place plans based on the whole system (7 steps), whereas other premises (registered but not approved) are required to have in place a system based on the first 5 steps of HACCP (excluding the recording/verification steps 6/7). An example of how to produce a generic HACCP plan is provided in Appendix 1A.

Temperature considerations should be incorporated into the HACCP type plan produced to address food safety considerations.

In considering the detail of the ‘HACCP’ style plan, the following points must be addressed.

- On landing, fish should be transferred immediately to a protected environment where its temperature can be maintained to that of melting ice within the range of (0 – 4°C). Where the period of holding is only a few hours, re-icing may be sufficient; however, where the period is longer, chilled holding facilities are recommended.

- The temperature of mechanically refrigerated areas (if present) should be pulled down to operating temperature as close to that of melting ice within the range of (0 – 4°C) prior to loading with product. Doors of the market, chills and transport should be kept closed when not in active use to minimise heat gain (by air exchange) and product temperature rise.

- Seafood such as crustacea and molluscs intended for live sale must be kept at a temperature that will maintain the animal in a healthy, living condition within a range of +1°C to +7°C (product specific).

- During any break in the grading/handling process, product must be suitably stored at chill temperatures.
• Check temperatures must be taken at appropriate intervals - at least twice daily - and recorded to verify the temperature profiles of product. Guidance on temperature calibration and recording is provided in Appendix 4A and Appendix 4B.

Product should be transported to the port in a refrigerated vehicle, if possible, but, as a minimum, the vehicle must be insulated and covered.
4.5 Undersized Fish (landing obligation)

The EU landing obligation applied from January 2015 and began a phased introduction from January 2016. By 2019 it will impact all fisheries covered by the Common Fisheries Policy (CFP).

- Under this, all catches of any species to which the landing obligation applies must be landed, including those that are undersize.

- Undersize fish cannot go for direct human consumption but can go either for non-direct human consumption such as food additives and fish proteins or non-human consumption such as fish meal, bait, cosmetics, and fertilisers.

- Undersize fish for non-direct human consumption markets must be handled according to food hygiene rules. As a port or market handling fish will be registered or approved as a food business, it will already be required to follow these rules.

- Undersize fish for non-human consumption markets must be handled according to ABP rules. Although these rules do not apply on-board fishing vessels, a port providing a facility to handle and store ABP fish will have to comply with these rules which require that storage and transport facilities are ABP approved.

- Ports and markets may want to provide facilities (for fishermen) that are ABP approved. Such facilities must be approved by or registered with the Animal and Plant Health Agency (APHA). [https://www.gov.uk/government/organisations/animal-and-plant-health-agency](https://www.gov.uk/government/organisations/animal-and-plant-health-agency)

- A port providing ABP storage and handling facilities must ensure sufficient separation between ABP fish and fish for human consumption during handling, storage and transportation. This can be achieved by leaving a clear space between ABP fish and food fish, or using a leak proof divide such as a separate compartment or containers. Boxes containing ABP fish must be labelled as ‘CATEGORY 3: not for human consumption’.


4.6 Toxins Harmful to Human Health

- Fishery products containing bio-toxins **must not** be placed onto the market.

- The following families of fish must be specifically excluded from being placed onto the market: Tetraodontidae, Molidae, Diodontidae and Canthigasteridae.

- FBO’s who run auction markets should have policies and procedures which address the sale of bivalve molluscs which may or may not contain bio-toxins above regulatory limits for biotoxins. Consideration should be given to known testing results as published on the Cefas website and shared industry results.

- Food business operators **must** ensure that live bivalve molluscs (including scallops) placed onto the market for human consumption meet food safety standards laid down in the regulations. Scallops should only be sold at auction to buyers who are specifically approved by the food authority for their processing.

- However, if a regular bio-toxin testing programme is in place and this indicates that bio-toxins are below regulatory thresholds, whole scallops may also be sold to non-approved fish buyers. This testing programme will need to be based on risk (i.e. more testing at higher risk times of year).

- Fish buyers, on request, should be provided with the most recent test certificate. It is anticipated that such testing will be carried out by harvesters (boat operators) or by the auction company on their behalf.
Appendix 4A: How to Calibrate of Temperature Measuring Devices

The port should develop procedures to ensure food remains safe in event of key equipment failure, for example, chill store break down.

Calibrating temperature measuring devices (thermometers).

Use in accordance with manufacturer’s procedures.

Calibration may be undertaken by organisations accredited to calibrate equipment, or in-house using the ice method (to check the accuracy of the temperature measuring devices at 0°C) as follows:

- Prepare a container of iced water (at least 60% ice).
- Stir well and allow the mixture to stand for 5 minutes.
- Immerse the thermometer into the water and allow the reading to stabilize.
- Repeat several times.

The reading should average 0°C or within ± 1°C. If the thermometer reads more than ± 1°C it must be recalibrated, serviced or replaced. Or, if the discrepancy can be made clear on the equipment, it may be used but the user must adjust the reading by the discrepancy for each use.

Record the average readings for this method on a record: Maintenance and calibration

Once a portable temperature measuring device has been calibrated, it can be used to calibrate fixed devices as follows:

- Place the portable temperature measuring device in a chiller overnight.
- Record and compare the portable temperature measuring device reading with the chiller room fixed thermometer reading in the morning.
- If the fixed temperature measuring device reads more than ± 1deg. C it may be recalibrated, serviced or replaced. Or, if it can be made clear on the equipment, the user must adjust the reading by the discrepancy then the device can continue to be used.

Note: Fixed temperature measuring devices (such as in a cool room etc) may be checked by service people when they conduct their regular service. As part of their report, they will need to provide a written statement that affirms the temperature measuring device is accurate to ± 1°C.
## Appendix 4B: Sample Temperature Log

**Chill: Storage temperatures**

**Storage Procedure:** Check the Chill storage temperature each day and record. If above 5°C check again in 30 minutes. If not getting colder and advise Manager.

### Example

| Month…Feb XX… | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | 14 | 15 | 16 | 17 | 18 | 19 | 20 | 21 | 22 | 23 | 24 | 25 | 26 | 27 | 28 | 29 | 30 | 31 |
|---------------|---|---|---|---|---|---|---|---|---|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|
| Chiller 1     | 5° | 9° | 9° |   |    |    |   |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |
| Chiller 2     | 3° | 3° | 3° |   |    |    |   |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |
| Check by      | WL | BP | D | H |    |    |   |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |
| Corrective action | 2/2 - Chiller 1: 9° checked again after 20 minutes still 9°, put food into fridge 2, advised manager, maintenance person to fix. BP |

Reviewed by manager: Date:
Module 5: Traceability and Authenticity

5.1 Introduction

The aim of this module is to ensure provision of information required to enable traceability and authenticity of seafood handled. The provision of information and those responsible for its provision will be different for different categories of port, depending on the nature of activities carried out at each.

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<thead>
<tr>
<th>Traceability considerations (responsibility)</th>
<th>Category of Port</th>
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</thead>
<tbody>
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<td></td>
<td>Level 1</td>
</tr>
<tr>
<td>Traceability</td>
<td>F</td>
</tr>
<tr>
<td>Authenticity</td>
<td>F</td>
</tr>
</tbody>
</table>

Key: F = Fishermen; P = Port Client group

Legislation

Food safety

Regulation 178/2002 - general principles and requirements of food law and procedures in matters of food safety

- One up/one down traceability throughout supply chain

Implementing Regulation 931/2011 – extends traceability requirements of Regulation 178/2011

- Requires additional information to be retained by food businesses

Fisheries control

Regulation 1224/2009 - establishes an EU control system for ensuring compliance with the rules of the common fisheries policy:

- Designation of markets where fish is first sold.
- Buyers and sellers of fist sale fish must register with Fisheries Departments and provide them with sales notes.
- Recording of weighing undertaken.
- Requires catch information to be available at all stages of the supply chain.


Fish Marketing

Regulation 1379/2013 – common organisation of the markets in fishery and aquaculture products:

- Provision of catch information to consumers

Third country imports:
Regulation 1005/2008 - establishes a Community system to prevent, deter and eliminate illegal, unreported and unregulated fishing from third countries:

- Requires a catch certificate for fish imported into the EU from non-EU countries

Common Fisheries Policy – landing obligation applicable to discards

Regulation 1380/2013 - Common Fisheries Policy

- Establishes measures to reduce the current high levels of unwanted catches and to gradually eliminate discards.

Regulation 1069/2009 – health rules as regards animal by-products and derived products not intended for human consumption:

- Record keeping associated with the approval, storage and handling of fishery products not intended for human consumption
5.2 Traceability

Product traceability is a food safety requirement under EU Food Law. It requires food business to know where delivered product has come from and to where it was subsequently despatched. At any point in the supply chain, this will allow food authorities to trace product from any particular point to its source or ultimate destination.

Catch traceability is a requirement under the EU Fisheries Control Regulation and applies to fishery and aquaculture products from EU waters landed into the EU. These measures are to help combat the landing of illegally caught fish from European waters by allowing cross checks to take place within the supply chain. It also allows for the provision of catch information to the consumer, as required under the Common Organisation of the Markets (CMO) regulation.

- Buyers and sellers measures require fish sold by auction to be held on a designated auction site. Sellers of first-sale fish sold at designated auction sites must register also with the UK fisheries authorities and submit sales information to local fisheries offices.

- Those responsible for the sale of fish on a fish-market must also provide specified catch information no later than the first sale.

- Catch traceability control measures apply to imports from non EU countries. These establish a control system to prevent, deter and eliminate illegal, unreported and unregulated (IUU) fishing, on fishery products entering the EU market.

Food Law Traceability

Fish markets are approved as food establishments under EU food hygiene regulations and are, therefore, food businesses. EU Food Law contains general traceability requirements and requires food to be traceable through all stages of production, processing, and distribution.

- Fish markets should keep records of who has put fish onto their market and to whom it was subsequently supplied. This also includes a reference identifying a particular lot or batch, its product description, quantity and date of dispatch. This information must be made available to enforcement officers, if requested, and kept until it can be reasonably assumed that product has been consumed.

Fisheries Control – Market Designation from EU waters

- Premises where fish is first sold must be designated by registering with the Fisheries Department of the geographical area where the premises are situated.

- The term ‘First-sale fish’ means fish that is landed by a vessel and offered for sale for the first time. In this section, ‘fish’ means first-sale fish, including shellfish.Premises can be registered via the following government website:

  This requires details of the company, premises, days and times of the auction, weighing facilities and the local authority hygiene certificate.
Fisheries Control – Registration of Buyers and Sellers from EU waters

- Anyone selling fish via auction across a designated auction site must be registered with Fisheries Departments. Buyers who buy fish only at designated auction sites do not need to register.

- Registered buyers or sellers of fish must complete and submit to Fisheries Departments a sales note for each transaction, submit sales notes electronically if required, keep a record of each sale for three years and make records available for inspection.

- Sales notes must contain details of the vessel, sale and fish. Further information on this and registration can also be found via the government website https://www.gov.uk/government/publications/buyers-and-sellers-of-first-sale-fish-and-submission-of-sales-notes

- Sales notes are required also when undersized fish is sold under the EU landing obligation. This is currently being phased in and will impact on all fisheries covered by the Common Fisheries Policy (CFP) by 2019. Under this, all catches of any species to which the landing obligation applies must be landed, including those that are undersize.

- A sales note must be provided for any sale or transfer of undersize fish, regardless of the quantity involved. The registered buyer or seller must provide a sales note with an accurate weight of the total amount of undersize fish by species, along with details of the catching vessel.


Fisheries Control – Weighing of fish from EU waters

Weighing of fish before they are sold or, transported for sale or storage is covered under Module 4 – Care of the Catch.

- The figure resulting from the weighing must be used for the completion of landing declarations, transport documents, sales notes and take over declarations.

A record of the weighing operation must be made and retained for 3 years by those responsible for the first marketing of the fish. Records must indicate:

- The FAO alpha-3 code of the species weighed
- Result of weighing for each quantity of each species in kilograms
- The external identification number and the name of the fishing vessel
- Presentation of the fisheries products weighed
- Date of weighing

Further information can be found at: https://www.gov.uk/guidance/how-to-trace-weigh-and-distribute-fish-products
Fisheries Control – Catch information requirements

The Fisheries Control (FC) Regulations apply to European waters and landings by vessels from UK and other Member States. Separate control requirements apply to fish sourced from non EU waters. The FC regulations require fisheries and aquaculture products to be put into 'lots' before first sale based upon species and size for each fishing vessel, or group of fishing vessels, or the same aquaculture production unit.

On fish markets, prescribed catch information for lots **must** be provided no later than first sale by those involved in presenting the fish for sale.

Information required for each lot of fish or shellfish

- Lot or batch reference - this is to provide traceability back to the vessel(s). (This would currently be costly and difficult to achieve on most UK markets.)

As traceability is already a requirement under food law, this should suffice at present. Fish markets are approved as food establishments under EU food hygiene regulations and are therefore food businesses. EU Food Law contains general traceability requirements and requires food to be traceable through all stages of production, processing, and distribution.

Fish markets should keep records of who has put fish onto their market and to whom it was subsequently supplied. This also includes a reference identifying a particular lot or batch, its product description, quantity and date of dispatch (the 'lot' reference comprises information describing vessel, species, date of capture and geographical catching area.) This information must be available to enforcement officers, if requested, and kept until it can be reasonably assumed that product has been consumed.

- Supplier name and address;
- Name of fishing vessel (or vessels for pair trawlers or group sales) and port identification number (PLNs);
- Date of catch. This can include several calendar days or one period of time corresponding to several dates of catches;
- Box weight or number of individual fish or shellfish;
- Predominant FAO sub area or division where caught;
- Category of fishing gear used;
- Commercial designation and scientific name of species caught. Labelling of boxes of fish should not be necessary on the market as the salesman will identify species and size prior to bidding.
- FAO alpha-3 species code.
Provision of catch information on the market

Businesses are required to ‘provide the information at the moment when the fisheries and aquaculture products are put into lots and no later than the first sale’.

Neither prescribed catch information sent to fisheries offices under the fisheries control buyers and sellers requirements nor do sales invoices subsequently sent to buyers meet with this requirement as they are completed after the first sale has taken place.

It is for individual operators to decide exactly how to conform to the requirements. Conformance could include:

- Labelling of individual boxes or bins - some vessels already do if weighing at sea;
- Providing information to buyers prior to sale – fish selling companies may already do this by e-mail in a label format. This label may also be provided with the vessels catch on the market;
  - Including information in port forward information systems; and
  - Including information in data provided at electronic auctions.
- Providing information verbally.

Further information on traceability can be found on the following websites, or by contacting the local Fisheries Office:


Fish sourced from a third country

- Third country imports of fisheries and aquaculture products are exempt from the need to provide all of the fisheries control catch information requirements on the market. However, they may still be subject to the need for the information subsequently required for the consumer and mass caterer under the CMO regulation and so should be available to those purchasing fish. This includes:
  - FAO catch area.
  - Category of fishing gear used.
  - Commercial designation and scientific name.

- A catch certificate for marine caught fish is required on entry for fish imported into the EU from non-EU countries. These are issued by the country where the fishing vessel is registered and provide evidence that fish have been caught legally and contain
information about when and where the fishing took place and how much fish was caught

Further information on third country imports can be found on the following website: https://www.gov.uk/guidance/catch-certificates-for-non-eu-imports-and-exports-of-fish

Fish subject to the Common Fisheries Policy landing obligation
There is no statutory obligation on ports to handle the undersize fish; however, if communal storage and handling facilities are provided at ports, responsibility for the fish then passes to the site owner.

- Undersize fish **must** not go for direct human consumption but can go for either non-direct human consumption (such as food additives and fish proteins) or non-human consumption (such as fish meal, bait, cosmetics, and fertilisers).
- Undersize fish for non-direct human consumption **must** be handled according to food hygiene rules and traceability will apply under food law requirements.
- Undersize fish for non-human consumption **must** be handled according to ABP rules, and records **must** be kept of consignments of ABPs that enter or exit the market. These rules apply the moment the owner (usually fishermen/fish agent) decides the undersize fish will go to non-human consumption markets once ashore.

Handling ABP fish ashore
Site owners or ‘operators’ are responsible for:

- Getting ABP approval; if you are not approved, contact your local Animal Health and Plant Agency (APHA) office to apply for ABP approval/registration. Presently, there are no fees associated with ABP approval/registration;
- The operation and upkeep of the facility;
- Vehicles transporting ABP fish **must** be ABP registered, or work as a transporter to an ABP approved site; and
- Recording the date when fish was received, its description and category, quantity and where it was sent.

Storing ABP fish ashore

- You **must** keep sufficient separation between ABP fish and fish for human consumption during handling, storage and transportation.
- A business or port providing ABP storage and handling facility **must** ensure sufficient separation; example methods of sufficient separation could include:
  - Clear space between ABP fish and food fish.
- Some form of leak proof divide between ABP fish and food fish stored in the same area.

- Leak proof divides could be made by:
  - Having a separate compartment, container or entire fridge used only for ABP fish in refrigerated spaces.
  - Shrink wrapping ABP fish or the containers storing the fish.

- Don’t put ABP fish boxes immediately above or beside boxes containing human consumption fish; this is because fish boxes do not have leak proof lids.

- Fish boxes or other storage containing ABP fish must be labelled clearly as ‘CATEGORY 3: not for human consumption’.

Further information can be found at:

  - https://www.gov.uk/guidance/animal-by-product-categories-site-approval-hygiene-and-disposal#getting-your-site-approved-or-registered

In Scotland, further guidance can be found on the Marine Scotland web site at:


As the implementation of the discard ban progresses and the implications for the fishing industry, ports and other onshore businesses are better understood, more guidance will likely be made available, and this CoP will be updated accordingly.
5.3 Food Authenticity (seafood certified to other certification schemes)

Different rules and requirements /regulations exist for handling certified seafood; they relate to the chain of custody that is specific to that certification scheme.

- Ports should work with specific schemes to be able to verify the controls in place to handle certified seafood in order to provide reassurance to the supply chain, e.g. MSC requirements, see below.

The Marine Stewardship Council (MSC) is an independent non-profit organisation which sets global standards for sustainable fishing. Fisheries wishing to demonstrate they are sustainable and well-managed are independently assessed to the MSC environmental standard for sustainable fishing. A complementary Chain of Custody assessment ensures traceability so that the MSC blue ecolabel can only be displayed on seafood products correctly sourced from an MSC certified fishery.

Chain of custody requires effective traceability, storage and record-keeping systems. The MSC also tests the traceability with random trace backs and DNA testing. The Chain of Custody Standard requires certified products to be:
- Purchased from certified suppliers
- Identifiable at all stages
- Segregated from non-MSC products
- Traceable
- And the participating organisation must have an effective management system in place

For example:

<table>
<thead>
<tr>
<th>MSC Scheme (unit of certification)</th>
<th>Information requiring verification</th>
</tr>
</thead>
<tbody>
<tr>
<td>Species</td>
<td>Pandalus borealis</td>
</tr>
<tr>
<td>Geographical range of fishing</td>
<td>The 'Northern Shrimp Fishery' in</td>
</tr>
<tr>
<td>operations</td>
<td>Shrimp Fishing Areas (SFA) 13, 14,</td>
</tr>
<tr>
<td>Method of capture</td>
<td>15</td>
</tr>
<tr>
<td>Stock</td>
<td>Otter Trawl</td>
</tr>
<tr>
<td>Management</td>
<td>SFA 13, 14, 15</td>
</tr>
<tr>
<td>Client group</td>
<td>DFO led management, through</td>
</tr>
<tr>
<td></td>
<td>Dartmouth, Nova Scotia, supported</td>
</tr>
<tr>
<td></td>
<td>by an Advisory Committee</td>
</tr>
<tr>
<td>Association of Seafood Producers</td>
<td>Members:</td>
</tr>
<tr>
<td>ASP members</td>
<td>Barry Group Inc.</td>
</tr>
<tr>
<td></td>
<td>Ocean Choice International L.P.</td>
</tr>
<tr>
<td></td>
<td>Fogo Island Co-op Society Ltd.</td>
</tr>
<tr>
<td></td>
<td>Notre Dame Seafoods Inc.</td>
</tr>
<tr>
<td></td>
<td>Nu Sea Products Inc. (BGI)</td>
</tr>
<tr>
<td></td>
<td>Northern Shrimp Ltd (OCI)</td>
</tr>
<tr>
<td></td>
<td>St. Anthony Seafoods Limited</td>
</tr>
<tr>
<td></td>
<td>Partnership (Clearwater)</td>
</tr>
</tbody>
</table>

More information can be found on the MSC's website at [https://www.msc.org/get-certified/supply-chain](https://www.msc.org/get-certified/supply-chain)
### Appendix I: Definitions used within the Code of Practice

#### RFPS Definitions

<table>
<thead>
<tr>
<th>Term</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>Applicant</td>
<td>The port / port authority is the core applicant. Depending on the specific circumstances at the port, the port authority may choose to remain the sole Applicant (thus taking direct responsibility for ensuring all clauses of the standard are met); or may choose to engage one or more other organisations (such as fish agents) as co-applicants, forming an Applicant Group.</td>
</tr>
<tr>
<td>Certified Applicant</td>
<td>An applicant operator and port (Unit of Certification) that will be certified formally by the Certification Body as meeting the RFPS Standard.</td>
</tr>
<tr>
<td>Unit of Certification</td>
<td>The Unit of Certification comprises the entities/bodies that are assessed against and, if certified, are able to make claims against a Standard. Within the RFPS, the Unit of Certification comprises the port itself.</td>
</tr>
<tr>
<td>Port Authority</td>
<td>The port authority is an authority for a special-purpose district formed usually by a legislative body (or bodies) to operate ports and other transportation infrastructure.</td>
</tr>
<tr>
<td>Port Operator</td>
<td>Include fish selling companies, fish agents or fish auction companies who are tasked with the selling of seafood on behalf of the fishermen to the supply chain via an auction or direct selling, and their employees.</td>
</tr>
<tr>
<td>Port Concession</td>
<td>This is an operator/processor that works within the port complex under a lease agreement with the Port Authority to conduct primary fish processing activities but is not considered to be a Port Operator.</td>
</tr>
<tr>
<td>The Standard</td>
<td>The list of requirements that the port applicant will need to meet to claim certification to the Standard and/or use the certified claim.</td>
</tr>
<tr>
<td>Port Code of Practice (CoP)</td>
<td>Industry-agreed codes of practice that describe best practice for operations of a fishing port.</td>
</tr>
<tr>
<td>Certified Claim</td>
<td>A claim made by a certified applicant port approved for use and licensed by the Standards Owner.</td>
</tr>
<tr>
<td>Identification Number</td>
<td>A certificate number issued to each certified applicant port.</td>
</tr>
</tbody>
</table>
### Appendix II: Organisations involved in the development of the Code of Practice

#### Oversight Board Members

<table>
<thead>
<tr>
<th>OB Member</th>
<th>Organisation</th>
<th>Sector</th>
</tr>
</thead>
<tbody>
<tr>
<td>Martyn Boyers (Chair)</td>
<td>Grimsby Market (Chief Executive)</td>
<td>Port/Market</td>
</tr>
<tr>
<td>Mark Simmons</td>
<td>BPA Fishing Port Group (Policy Manager)</td>
<td>Port</td>
</tr>
<tr>
<td>Peter Bromley</td>
<td>Sutton Harbour (South West)</td>
<td>Port</td>
</tr>
<tr>
<td>Celia MacKenzie</td>
<td>Whitehaven Harbour (Chief Executive)</td>
<td>Port</td>
</tr>
<tr>
<td>Kevin Quigley</td>
<td>Northern Ireland Fishery Harbour Authority</td>
<td>Port</td>
</tr>
<tr>
<td>Barry Young</td>
<td>Brixham Market</td>
<td>Fish Agent (market)</td>
</tr>
<tr>
<td>Mike Mitchell</td>
<td>Brand Manufacturer</td>
<td>Processing</td>
</tr>
<tr>
<td>Lesley Fairhurst</td>
<td>Waitrose (Brand Policy Manager)</td>
<td>Retail</td>
</tr>
<tr>
<td>Vacant</td>
<td>Client Earth (Sustainable Sea Food Coalition)</td>
<td>NGO</td>
</tr>
<tr>
<td>Leah Buckley</td>
<td>Marine Stewardship Council</td>
<td>NGO</td>
</tr>
<tr>
<td>Jonathan Shepherd</td>
<td>Seafish Board Member</td>
<td>Independent</td>
</tr>
</tbody>
</table>

#### Technical Committee Members

<table>
<thead>
<tr>
<th>TC Member</th>
<th>Organisation</th>
<th>Sector</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jonathan Shepherd (Chair)</td>
<td>Seafish Board Member</td>
<td>Independent</td>
</tr>
<tr>
<td>Martyn Boyers</td>
<td>Grimsby Market (Chief Executive)</td>
<td>Port/Market</td>
</tr>
<tr>
<td>David-John McRobbie</td>
<td>Don Fishing</td>
<td>Fish Agent</td>
</tr>
<tr>
<td>Peter Bromley</td>
<td>Sutton Harbour (South West)</td>
<td>Port/market</td>
</tr>
<tr>
<td>Matt Bailey</td>
<td>Brixham Market</td>
<td>Fish Agent</td>
</tr>
<tr>
<td>Dave Bartlett</td>
<td>Brixham Port Authority</td>
<td>Port</td>
</tr>
<tr>
<td>John Foreman</td>
<td>Peterhead Port Authority</td>
<td>Port</td>
</tr>
<tr>
<td>Rob Parsons</td>
<td>Newlyn Port Authority</td>
<td>Port</td>
</tr>
<tr>
<td>Rayaz Dhalla</td>
<td>Waitrose (Brand Policy Manager)</td>
<td>Retail</td>
</tr>
<tr>
<td>Leslie Fairhurst</td>
<td>Waitrose (Brand Policy Manager)</td>
<td>Retail</td>
</tr>
<tr>
<td>Laky Zervudachi</td>
<td>Direct Seafood’s (Director Sustainability)</td>
<td>Retail</td>
</tr>
<tr>
<td>Mike Platt</td>
<td>Marine Stewardship Council</td>
<td>NGO</td>
</tr>
<tr>
<td>Nick Kightley</td>
<td>Ethical Trading Initiative</td>
<td>NGO</td>
</tr>
<tr>
<td>Lars Barker</td>
<td>Torbay Council</td>
<td>Environmental Health</td>
</tr>
<tr>
<td>Simon Potten</td>
<td>Seafish</td>
<td>Training</td>
</tr>
<tr>
<td>Hannah Fawcett</td>
<td>Seafish</td>
<td>Regulation</td>
</tr>
<tr>
<td>Richard Caslake</td>
<td>Seafish</td>
<td>Catching</td>
</tr>
<tr>
<td>Jess Sparks</td>
<td>Seafish</td>
<td>Markets</td>
</tr>
</tbody>
</table>

#### Other Technical Consultees

<table>
<thead>
<tr>
<th>Technical Consultee</th>
<th>Organisation</th>
<th>Sector</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dave Fenner</td>
<td>Maritime and Coastguard Agency (MCA)</td>
<td>Regulation</td>
</tr>
<tr>
<td>Leanne Page</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Christopher Angell</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Julie Carlton</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Gary Owen</td>
<td>Marine Management Organisation (MMO)</td>
<td>Regulation</td>
</tr>
<tr>
<td>Roger Mason</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Steven Hendry</td>
<td>Food Standards Scotland (FSS)</td>
<td>Regulation</td>
</tr>
<tr>
<td>Georgina Finch</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
For more information on the Responsible Fishing Ports Scheme go to:

http://www.seafish.org/responsible-sourcing/responsible-fishing-ports-scheme