Responsible sourcing recommendations for the Spanish seafood supply chain

February 2019

OCEANA · Our Fish · Sustainable Fisheries PARTNERSHIP · WWF · GREENPEACE · ClientEarth

There is increasing interest in the Spanish seafood supply chain for fisheries and aquaculture to be more environmentally and socially sustainable.

For businesses to ensure more sustainable seafood is part of their strategic planning and Corporate Social Responsibility (CSR), they must make specific sourcing policy commitments and set defined, time-bound and measurable indicators.

This policy must be public and easily accessible. In addition, it must include all seafood from both wild and farmed sources: including fresh, frozen, canned or pre-processed.

A successful responsible sourcing policy will not only align with these recommendations, but will also include a process for progressive and continuous improvement over time.

Goal of this document

Our group of environmental NGOs, each working on sustainable seafood in Spain, has identified the following joint recommendations. If these recommendations are applied in conjunction with complying with relevant laws, we believe there will be true progress for responsible sourcing of seafood in Spain[1]

Ten responsible sourcing recommendations

1 Ensure a supply that strictly complies with all current legislation, throughout the supply chain.

2 Begin a risk assessment process, by identifying and collating information on all seafood products within the business. This should include at a minimum:

commercial designation, scientific name, fishing gear used, production method, presentation, stages of processing, relevant geographical area and volume.

3 Prepare environmental, legal and social risk assessments[2] tracking seafood throughout the supply chain back to its origin.

These assessments will identify the stages in the supply chain that are at a higher risk of the presence of illegal, unreported or unregulated (IUU) fish and/or a higher risk of noncompliance with the ILO Work in Fishing Convention[3] 188 regarding decent working conditions.

4 Prepare improvement action plans with responsible, quantifiable and time-bound measurables to ensure a supply chain in line with the business' priorities.

Adherence to this plan over time will result in a more sustainable supply. The plans should be evaluated annually to measure compliance against commitments. It is advisable to prepare these plans according to the outcomes of the risk assessments described in the recommendation above.

5 Have an independent third-party verifiable system of traceability[4] throughout the supply chain, which gathers all relevant information and allows tracking of a product from point of sale to its origin (caught or farmed) throughout all processing, handling and distribution phases.

For all lots of fisheries and aquaculture products identify this information[5] at a minimum: identification number of each lot; external identification number and name of fishing vessel or name of aquaculture production unit; FAO alpha-3 code of each species; date of catches or the date of production; quantities of each species in kilograms expressed in net weigh or, where appropriate, the number of individuals; name and address of the suppliers; commercial designation; scientific name; fishing gear; production method; geographical area; and, landing port. The traceability system should require the use of effective mechanisms such as electronic systems or chain of custody audits by standards that are recognised by ISEAL[6]/ GSSI[7].

6 Specifically in relation to information provided, strictly comply with regulations on mandatory information of fisheries and aquaculture products[8] and make any information accessible to customers through labelling.

Where the regulations are less demanding, such as for tinned and other processed products, these companies should commit to providing in their own-brand products the same information that is required in fresh and frozen, through on-product labelling and/or the website.

7 Sourcing from well-managed, legal, fair and sustainable fisheries should be the goal of the sourcing policy. There are different routes to that and we recommends prioritising the following requirements in the sourcing policy:

- Fisheries and supply chain companies that are certified to a third party sustainability standard that is recognised by ISEAL and / or GSSI.

- Fisheries that are in a credible improvement project that follow the recommendations[9] of the Conservation Alliance for Seafood Solutions[10], and the improvement project is included in FisheryProgress.org[11].

- Low impact fisheries that have management frameworks and healthy fish populations that are not exploited beyond their maximum sustainable yield, and a public, independent third-party verification.

- Fisheries that are identified in the seafood purchase recommendations by this document and verified by our coalition of organisations.

8 Ensure your suppliers also fulfil these recommendations and support the implementation of credible[12] improvement projects of any fisheries not included in the previous recommendation

9 Request the appropriate public authorities to:

- Improve existing legislation and its application, in relation to the fight against illegal, unreported and unregulated fishing (IUU); on fisheries control; fisheries management; marketing and labelling; transparency and access to information; and, adaptability of fishery policies to the situation of fish stocks through the promotion of harvest control rules and responsible and precautionary fishing strategies.

- Improve scientific knowledge about fisheries, including carrying out stock assessments, for populations that lack them and establish management measures according to these assessments.

- Enact greater collaboration and coordination among the different competent public administrations, in order to achieve the effective application of the Law, throughout the entire supply chain.

- In relation to the application of the landing obligation and the minimisation or elimination of discarding unwanted catches, and the correct documentation of fisheries through measures such as: increasing the number of observers on board and/or mandating the use of Remote Electronic Monitoring systems at sea.

- Demand rigorous control of imported seafood, especially those that arrive in container by sea or land, ensuring total traceability of the product.

10 Partner with an independent third party, who can verify the completion of these recommendations and publicly validate the progress of the established objectives.

Responsibility, sustainability and low impact fisheries

When referring to seafood, it is necessary to define two concepts: "responsibility" and "sustainability". Responsibility is about the behaviour of each company, taking into account the environmental, social and economic aspects of its activities. A company is responsible if it follows these recommendations and clearly communicates the actions have been taken.

According to the FAO, sustainability refers to the "conservation of the natural resource in a way that guarantees the continuous satisfaction of human needs for present and future generations[13]".

Sustainability[14] relates to the current environmental and management status of the fish. A company will only make sustainability claims if it is satisfied the following minimum criteria are met:

• The source fishery or aquaculture source(s) is/ are consistent with the principles of relevant key international standards and codes of conduct; and

• An independently audited chain of custody is in place to trace the fish to its (fishery or aquaculture) source.

The company will demonstrate that these criteria have been met by at least one of the following:

• Certification to a third party sustainability standard; or

• Independent third party audit.

Certified seafood can be labelled as sustainably sourced only if it aligns with a third-party sustainability standard recognised by ISEAL and / or GSSI, and must be in accordance with the terms and conditions of the certification standard.

Low-impact fisheries are those that: use selective gear that is non-destructive on the surrounding habitat; apply existing – and when insufficient, self-imposed – measures to protect fish and their habitats; and comply with legal obligations for management and sales.

The importance of the seafood industry in sustainability

The seafood supply chain, together with consumers and civil society – who also want to see these sustainability commitments – are the main vectors of change, seeking better governance of fisheries and encouraging good fishing practices. These ten recommendations can contribute to continuous improvement by different companies throughout the supply chain.

Independence of the members of this coalition group

This document respects the current work that each organisation does independently. It does not affect the individual work that each organisation will continue to perform with the seafood supply chain for the responsibility and sustainability of fishery and aquaculture products.

References

1   These recommendations follow the "A Common vision for Sustainable Seafood" from the Conservation Alliance for Seafood Solutions: https://solutionsforseafood.org/wp-content/uploads/2017/12/A-Common-Vision-for-Sustainable-Seafood-Dec-17.pdf

2   There are tools to help prepare environmental, legal and social risk assessments, prepared by third parties that can be of help: [In Spanish] https://www.es.clientearth.org/herramientas-elaboracion-mapas-de-riesgos-ambiental-social-economico

3   International Labour Organization, ILO. C188- Work in Fishing Convention, 2007: https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C188

4   Traceability is one of the NGO priorities on the revision of the EU Fisheries Control System. See: https://www.documents.clientearth.org/wp-content/uploads/library/2018-10-23-joint-ngo-priorities-on-the-revision-of-the-eu-fisheries-control-system-coll-en.pdf

5   The Commission's proposal for a new Control Regulation, in its article 58, also introduces new information to be circulated. This means that this information will need to be updated in this document once the new Control Regulation will be adopted.

6   ISEAL is the global membership association for credible sustainability standards: https://www.isealalliance.org/

7   Global Sustainable Seafood Initiative (GSSI): https://www.ourgssi.org/

8   The following rules apply: Reglamento (UE) n.º 1379/2013 del Parlamento Europeo y del Consejo, de 11 de diciembre de 2013 por el que se establece la organización común de mercados en el sector de los productos de la pesca y de la acuicultura; Reglamento (UE) Nº 1169/2011 del Parlamento Europeo y del Consejo, de 25 de octubre de 2011, sobre la información alimentaria facilitada al consumidor; Reglamento (CE) Nº 1333/2008 del Parlamento Europeo y del Consejo, de 16 de diciembre de 2008, sobre aditivos alimentarios; Reglamento (ce) Nº 853/2004 del Parlamento Europeo y del Consejo de 29 de abril de 2004, por el que se establecen normas específicas de higiene de los alimentos de origen animal; y Real Decreto 126/2015, de 27 de febrero, por el que se aprueba la norma general relativa a la información alimentaria de los alimentos que se presenten sin envasar para la venta al consumidor final y a las colectividades, de los envasados en los lugares de venta a petición del comprador, y de los envasados por los titulares del comercio al por menor.

9   These recommendations can be found at: https://solutionsforseafood.org/wp-content/uploads/2018/02/Alliance-FIP-Guidelines-Spanish.pdf

10 https://solutionsforseafood.org/

11 https://fisheryprogress.org/

12 https://solutionsforseafood.org/

13 Council of FAO, 1988: http://www.fao.org/3/X3307s04.htm [In Spanish]

14 See "Code of Conduct" document from Sustainable Seafood Coalition, SSC, page 17. https://www.documents.clientearth.org/wp-content/uploads/library/2015-09-16-sustainable-seafoodcoalition-codes-of-conduct-ssc-en.pdf