AIPCE-CEP Recommendations

Principles for Environmentally Responsible Fish Sourcing

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Principles for Environmentally Responsible Fish[1] Sourcing

Background

Academic studies and NGO highlight decreased abundance, ecological damage and loss of biodiversity in many aquatic eco-systems. However, fish consumption within EU countries continues to grow in both value and volume as the acknowledged health and dietary benefits of eating fish are increasingly highlighted. Aquaculture development is supporting much of this growth but wild resources continue to contribute a major element.

The industry is faced with the challenge of managing this growth in consumption in an environmentally responsible manner. Traders, processors, multiple retailers and food service distributors have actively taken on this challenge to cooperate and create responsible fish supply chains.

There are many examples of well managed fisheries that are administered by governmental or inter-governmental bodies in conformance with the FAO Code of Conduct for Responsible Fisheries. However there are still fish stocks under pressure due to overfishing.

There are a number of government and private initiatives to introduce guidelines or certifiable standards for fish farming that are internationally recognised to serve as general, valid benchmarks for responsible aquaculture operation.

AIPCE-CEP represents processors and traders of all forms of fish within Europe. The principles described in this document were developed by the AIPCE Sustainability Group as a model for companies' own policies. AIPCE-CEP have agreed to use standards and other sources of advice to risk assess and categorise fisheries and fish farms. The outcomes of these assessments will guide our engagement plans to improve fishery and aquaculture management although specific actions by individual companies will be determined by their own policy decisions.

The scope of this document is restricted to environmental responsibility. Food safety and social compliance issues are not included within the scope of this document.

[1] Fish in this context will be all forms of wild captured and aquaculture products of fish and shellfish. This include fresh, frozen, canned, salted, smoked, pateurized products.

1. Our Vision

Our vision is to secure long term sustainable sources of marine and freshwater fish to provide high quality nutritious food for today's consumers and future generations. This will require us to set ambitious targets as well as to commit sufficient resources to support other stakeholders, such as governments and eNGO's in delivering the vision.

2. Our Commitments

1. Cooperation

We are committed through a collaborative approach to the improvement of fish sustainability – working together, combining strategically to influence fishery and fish farming governance and practice towards a more sustainable future.

2. To work to eliminate IUU

We are committed to support the growing international movement to stop all trade in illegally caught seafood. Having actively been engaged with stakeholders when working on IUU Regulation, we will ensure our suppliers can fully comply with the certification demanded by the EU and call for the global adoption of these types of certificates in all sectors including fishmeal and fish oil, so there are no home for illegal caught seafood. Traceability is a key control mechanism in combating illegal fishing.

3. To have fully traceable fish products

Wild caught fish are to be traceable back either to the catching vessel or a known group of vessels and their landing ports. Where required for legal compliance or certification this must include the specific catch area.

Farmed fish products are to be traceable back to the farm site and the records at the farm show traceable movements and origins back to parent stocks. All inputs of feed and chemicals are to be recorded.

4. To support independent standards

We will continue to support the development and widespread adoption of certification standards for responsible fisheries and aquaculture as well as a process for certifying producers who adopt the standards. Examples include:

- The Marine Stewardship Council
- The Aquaculture Stewardship Council the WWF Aquaculture Dialogues
- The International Fishmeal and Fish Oil Organisation Global Standard for Responsible Supply
- GlobalGAP
- The Global Aquaculture Alliance Best Aquaculture Practises
- The International Seafood Sustainability Foundation
- Icelandic Responsible Fisheries

5. To drive continuous improvement in fisheries and fish farming

We will use risk assessments tools described in this document as the basis for our engagement with fish sources and the development of improvement programmes.

6. To use fact based information sources

We are committed to the principle that decisions taken and strategies developed by us will be on the basis of the best quality fact based information available at the time. Typically, these sources will include opinion from governmental, ministerial, academic or independent scientific agencies as well as science based NGO research. We may chose our own bespoke mechanics in interpreting and processing this data/opinion but any formal assessment criterion must be a consistent and fact-based process.

7. To minimise waste and discarding at sea

Discarding fish at sea is an unacceptable practice. Some fishery management systems allow fishermen to throw overboard dead or dying fish that are under the legal minimum catch size or fish for which the boat does not have a quota. We are committed to supporting the development of technical measures and solutions that avoid or minimise by-catch, but where it is unpreventable we believe that responsible fishing, and fish processing, implies full utilisation of the catch, including utilisation of by-catch and by products of processing. Any potential for sales income could be used to fund investment in fisheries science. This commitment includes actively campaigning for the introduction of Long Term Management Plans (LTMP's) in fisheries. These are plans to maintain fish stocks on a long term basis at levels capable of producing maximum sustainable yields.

8. To engage in Fishery Improvement Projects

We are committed to actively contribute to further advance fishery management by participating with fishermen, scientists, industry and regulators in fisheries improvement projects working to improving fisheries so they reach then maintain an ecologically and economically sustainable fish stock size. Work will include:

a. Agreeing on necessary policy and regulatory improvement measures and coordinating efforts to engage regulators on these measures;

b. Agreeing on necessary private-sector improvement measures (e.g., purchasing standards, fishing practices, traceability), implement these measures, and encourage their uptake by all the participants engaged in the fishery.

c. Agreeing on methods on how to improve fisheries so they become ecologically and economically sustainable for the benefit of producers, suppliers, buyers and society at large.

9. To take a broad Environmental perspective

We are committed to working together on other issues such as carbon footprint, energy – and water usage as well as waste reduction.

Annex – Environmental Risk Assessment Tool

In order to support AIPCE-CEP efforts to implement our commitments above, the AIPCE-CEP Sustainability Group has developed the following Environmental Risk Assessment Tool for the guidance of processors and traders.

A. Wild captured fish

a) Assessment scope

The scope of any metric should incorporate the following four stages:

- Fishery certification status & other independent ratings
- Stock status with reference to biological reference points (where set)
- Management & Compliance
- By-catch & wider environment impacts of the fishing activity

b) Units of assessment

Fisheries are to be assessed in units in accordance with:

- Species
- Statistical fishing area (if designated)
- Legal, national or RFMO jurisdiction
- Metier (fishing gear)

B. Farmed fish

a) Assessment scope

The risk assessments are based on the following areas:

- Use of genetically modified (transgenic) fish
- Aquaculture certification status & other independent ratings
- Effectiveness of regulatory controls and inspection regimes
- Farm site, including site selection, construction, water treatment, environmental impacts, and procedures to prevent escapes
- Fish handling and controls including fish welfare
- Disease prevention and controls
- Feed sources e.g. fishmeal and oil sources as well as other agricultural products and contaminants
- Feed conversion ratio

b) Units of assessment

Aquaculture operations should be assessed separately in accordance with:

- Species
- Farming method (Open cages or ponds / Recirculation closed systems)

Risk Assessment Process

Companies must assess the potential risk (high, medium or low) in each of the assessment categories. The overall risk analysis is a function of these individual section results.

The definition of risk status designation is as follows:

Low Risk: A fishery which has been independently certified as sustainable against a standard which is in accordance with the FAO Guidelines for the Eco-labelling of Fish and Fishery Products from Marine capture Fisheries, or an assessment where all sections are assessed as 'low risk'.

An aquaculture operation which has been independently certified as sustainable against a standard which is in accordance with a GAP standard for aquaculture operation or an assessment where all sections are assessed as 'low risk'.

Medium Risk: Any combination of 'low risk' and 'medium risk' section results.

High Risk: A fishery or an aquaculture operation where any section result has been determined as 'high risk'.

Responses to 'High Risk' evaluations

Where a species, a fishery or an aquaculture operation generates a 'high risk' assessment result, companies will be faced with a decision-making process with respect to their response and future actions regarding that fishery or species.

In most cases, there will be two possible courses of action:

- Withdrawal from commercial engagement with that fishery, species or aquaculture operation.
- Remain engaged with fishery, species or aquaculture operation under clearly defined conditions.

For companies, it is of paramount importance to recognise that withdrawal from a problem fishery/aquaculture operation is not the only and indeed may not be the best response to a high risk assessment.

Our fact based assessment system allows companies to identify and focus on particular areas which are causing the concern (high risk assessments) and therefore giving clear direction for any corrective actions or projects which may be pursued.

Because each fishery/aquaculture operation assessment will be unique, there are no pre-prescribed courses of action in the event of a 'high risk' rating, although the following outlines the principles which members will adhere to.

In order to retain a commercial engagement with a 'high risk' fishery, species or aquaculture operations, companies must follow the AIPCE-CEP Code requirements using competent third party verification:

1. Be able to demonstrate that the long term status of the fishery/aquaculture operation is best served by on-going engagement;
2. Define the aims and the milestones which constitute indicators for improvement;
3. Engage in consultation including independent input to drive and encourage positive change in the management measures;
4. Consult and report on progress;
5. Develop robust supply chain traceability and integrity;
6. Where companies decide to remain engaged with a 'high risk' status fishery/ aquaculture operation, they will review the position regularly to assess whether the balance is still in favour of constructive engagement.

The AIPCE-CEP Code defines criterion for progress as:

1. Fishery science demonstrates improved biological indicators as reported in the stock status assessments;
2. An assessment of the effectiveness of the positive change in resource management as witnessed through material changes in governance measures;
3. Improved compliance;
4. Results of verification audits for aquaculture operation.

The AIPCE-CEP Code recognises the following considerations in determining whether it is appropriate to have a staged or immediate withdrawal from a fishery resource/aquaculture operation:

1. The perceived potential impact on the biological status of the fishery;
2. The perceived level of influence for positive change in management measures which may realistically be leveraged;
3. Repeated failure to comply.

In the event of a company withdrawing from a fishery resource or aquaculture operation, the company should continue to advocate positive change in order to facilitate re-engagement at some future time. Re-engagement could occur when the fishery/aquaculture operation has been re-evaluated.

Re-engagement may be full or phased on a gradual basis if there is a perceived need to develop market confidence and recognition of positive change.

Responses to 'Medium Risk' evaluations

In the case of a fishery/aquaculture operation achieving a 'Medium Risk' status, it should be the intention, where appropriate and where there is sufficient leverage, for companies to identify those actions which will result in the fishery being able to achieve re-classification as a 'Low Risk' fishery/aquaculture operation. This may involve:

1. The identification of projects and initiatives which address the shortfall from Medium to Low Risk.
2. Identify timescales and Key Performance Indicator's (KPI) to benchmark progress.

Discuss with AIPCE-CEP Sustainability Group members and other interested stakeholders any potential for collaborative actions which would lead to re-classification.

Responses to 'Low Risk' evaluations

Where a fishery/aquaculture operation achieves a 'Low Risk' evaluation, companies should:

1. If not already certified against a standard which is in accordance with the FAO Guidelines for the Eco-labelling of Fish and Fishery Products from Marine capture Fisheries (e.g. MSC) or a GAP standard for aquaculture operation, identify the potential route to certification.
2. Discuss certification with the management agency for the fishery/aquaculture operation and consider potential options for support.
3. Ensure that the positive provenance message regarding the product is communicated to customers.
4. Consider potential improvements which could further improve the status of the fishery/aquaculture operation.