RECOMMENDATIONS FOR ADDRESSING SEAFOOD TRACEABILITY AND KEY DATA ELEMENTS

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Developed by:

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FUTURE of FISH

IFT feeding the minds that feed the world

GFTC GLOBAL FOOD TRACEABILITY CENTER

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Our four groups, working together as a jointly funded collaboration, developed this document to address two questions commonly posed by actors within the seafood industry:

1. **When seafood companies, retailers, and foodservice companies make seafood traceability commitments, to what level of traceability for wild and farmed products should they commit?**

2. **Which key data elements about products should seafood companies, retailers, and foodservice companies implement in their traceability systems?**

Our collaboration recognizes the importance of these questions, and acknowledges the strong desire among the seafood industry and stakeholders to have answers that are clear, broadly shared, and not subject to frequent revision. Unfortunately, simple answers to the above questions are not yet available today; the good news, however, is that our collaboration and others are working to produce precisely such answers.

At least two factors have contributed to the difficulty of achieving a clear, shared, and stable approach to seafood traceability: (i) the

enormous differentiation within the seafood industry–in terms of company type, internal resources, commodity focus, competitive leverage, risk tolerance, etc.–and the resulting variability in traceability practices; and (ii) the highly dynamic character of the traceability landscape, which is steadily changing as a result of increased regulatory oversight in major seafood importing markets, rapidly evolving supply chain technologies and systems, growing consumer pressures and levels of industry engagement, and coalescing multi-stakeholder and industry-led initiatives.

In response to these conditions, it is clear that industry best practices and norms are shifting, and businesses are attempting to implement traceability improvements knowing that the landscape is dynamic and that goalposts are moving as the field evolves. With this complex and unstable context in mind, it is imperative that companies deploy an adaptive management approach when making traceability improvements. Accordingly, this memo outlines the "interim advice" we suggest for industry members in the short term.

Many companies and other stakeholders have recognized the need for the standardization of key data elements (KDEs) and generation of global traceability standards. The Global Dialogue on Seafood Traceability (the Dialogue) - an international business-to-business platform established to advance a unified framework for interoperable seafood traceability practices - has already begun working to develop an internationally agreed list of KDEs to be routinely associated with seafood products, and to establish routine business norms and practices for traceability. The Dialogue will also develop internationally agreed upon benchmarks for data validity and best practices for the verification of information contained in seafood KDEs. Our collaboration urges companies to register for the Global Dialogue to help shape the goalposts that will guide future industry expectations and practices.

Because it will be 1-2 years before the Global Dialogue produces a universal KDE list and a set of best practices, companies can use the following recommendations to help guide their decisions around making traceability

improvements now:

» Regularly review and update company traceability practices due to evolving industry goalposts;

» Make any near-term investments in traceability infrastructure on the assumption that requirements will continue to change in the years ahead;

» Collect KDEs in compliance with government requirements such as the U.S. Seafood Import Monitoring Program and the EU IUU Regulation, then layer on additional KDEs to meet individual company commitments, goals, and industry best practices;

» Make near-term investments in traceability infrastructure in consultation with other industry actors and stakeholders active in your supply chains and/or industry sub-sectors, engaging to the extent possible in pre-competitive processes that allow companies to move towards adopting interoperable solutions;

» Work towards implementation as soon as possible of digital, full chain, secure, electronic, interoperable data systems;

» Require and promote robust verification practices from the private sector and governmental actors responsible for producing the information underlying traceability systems;

» Become an active participant in the Global Dialogue on Seafood Traceability to help set future industry goalposts;

» Utilize the tools, resources, and information developed by our collaboration; and

» Leverage education and training opportunities offered by our collaboration to accelerate the alignment of KDE requirements across the entire supply chain.

Our collaboration especially notes the importance of ensuring that any discussions and improvements regarding data collection and KDEs are framed within broader

conversations about **data verification** and the importance of working towards **end-to-end, electronic, interoperable data systems**. No matter how strong a company's data collection practices are, KDEs by themselves do not ensure a company's products or supply chains are traceable. Verification is paramount to achieving robust traceability as it helps ensure that information flowing through supply chains is reliable and accurate. It is also important that companies review and update (if necessary) data systems periodically so they will be better prepared to meet agreed-upon industry best practices, interoperable data standards, and the evolution of KDEs.

We would also like to stress that KDEs, verification, and robust data systems are not only important to individual company and supply chain improvements, but are also essential to generating the data and transparency needed to support fishery management efforts and strengthen oceans governance globally. Our collaboration is tracking traceability efforts to ensure information and lessons learned are being shared and applied across sectors.

In the remainder of this document, we provide some additional answers that elaborate on the foregoing advice and address more specific practical questions.

1. TRACEABLE TO WHAT UNIT?

For wild-caught products, we recommend that companies collect data to ensure traceability back at least to the fishing vessel(s), trip(s), and fishery/management unit.

For wild-caught products, there should be traceability back to the fishing vessel(s) involved in the harvesting of the fish. Traceability back to the vessel(s) is necessary to ensure that wild-caught products can be traced to the source and demonstrably linked to legal and permitted fishing activities. With the EU IUU Regulation (EC No 1005/2008) already in place and the U.S. Seafood Import Monitoring Program (SIMP) going into effect Jan. 1, 2018, proof of fishing vessel information is now a trade prerequisite for companies importing seafood into those markets.

Additionally, the Tuna 2020 Traceability Declaration that was signed at the United Nations Ocean Conference in June 2017 also includes a Tuna Traceability Commitment in which industry leaders have pledged that all tuna products in their supply chains will be fully traceable to the vessel and trip dates by 2020. We strongly encourage companies to require and promote the use of IMO numbers and the listing of vessels on transparent vessel registries as a means to ensure the use of reliable vessel identities.

The time and place of harvest are also key elements of establishing the unit of production. In some cases, time and place considerations may be adequately addressed through identification of specific fishing trips

and fishing grounds. In other cases–especially where multiple fishing practices are employed in a single voyage, or where regulations impose specific time or location requirements–product may need to be segregated on the basis of more specific times, gear sets, and/or locations. Location identification in all cases should be sufficiently specific to identify the national and/or international authorities having jurisdiction over the fishing grounds.

We are aware of strong concerns by some industry actors regarding the feasibility of vessel-specific information in the case of highly aggregated products. If product is aggregated in supply chains, then it may be traceable to a set of fishing vessels. In that case, companies should track all fishing vessels and trips that may have been aggregated into a single shipment to demonstrate that the vessels are all legal and permitted. Aggregation should not be a barrier to traceability, however, it does require that additional information is stored and shared within supply chains.

For aquaculture products, we recommend that companies collect data to ensure traceability to the farm(s), as well as to the feed and stock inputs to the farm(s).

For aquaculture products, there should be traceability back to the individual farm(s) to ensure that the products can be traced to the source and demonstrably linked to legal production activities, as well as traceability to the feed and stock inputs to the farm(s), including: hatchery, feed mill, fishmeal plant, and feed ingredient sources.

Ensuring traceability to the farm level, including the GPS location of the farm(s), is often critical to assessing many key impacts of production, as well as to identifying the prevailing regulatory requirements. Traceability to the hatchery is important for both domesticated and wild broodstock. If from wild sources, traceability to the hatchery can help ensure that broodstock are harvested from sustainably managed, legal, and permitted stocks. It is also important that the feed mills, fishmeal plants, and wild-caught fish inputs are documented so that risks associated with illegal, unreported, and unregulated (IUU) fishing and human rights can be identified and addressed. Studies have found that undocumented steps in supply chains, such as shrimp peeling sheds or fishing boats supplying feed mills, are where problems can be most severe. There are industry efforts underway to improve information sharing within supply chains regarding the harvest and origin of wild feed components, and to map these critical stages.

2. WHICH KEY DATA ELEMENTS SHOULD COMPANIES COLLECT?

The question of which KDEs should be routinely collected is one core focus of the Global Dialogue on Seafood Traceability. The Dialogue is working towards identifying industry-wide "basic universal lists" to serve as default reference points for both wild-caught and farmed products. However, given the different circumstances, products, and capacities of seafood companies, it is clear that no "one size fits all" KDE list is possible. There are also species-specific and commodity-specific elements that should be considered as well. For example, a company sourcing or distributing exclusively shelf-stable tuna products may want to collect additional data that is specific to their products. This could include a gear list specific to tuna harvest methods or a KDE that captures whether the product underwent transshipment. The Global Dialogue will also attempt to address at least some of these specific circumstances.

Pending the outcome of the Global Dialogue, our collaboration suggests that companies look at the following five sources of guidance on the collection of seafood KDEs in order to inform near-term improvements or changes to their data collection practices. These sources are:

1. U.S. Seafood Import Monitoring Program (SIMP);

2. EU IUU Regulation (EC No 1005/2008);

3. Conservation Alliance for Seafood Solutions lists of both basic and additional information companies should collect and monitor about products;

4. KDEs to ensure the legality and traceability of wild-caught products; and

5. Best practice KDEs in the context of enabling global interoperable seafood traceability.

While there are many other seafood KDE lists that can be referenced, these five sources represent a good starting point. Companies engaged in the Global Dialogue are receiving background materials that provide information on other sources, and will have a means to remain abreast of (and influence) the emergence of industry-driven norms around seafood KDEs.

It will be important to monitor KDE developments and ensure that whatever KDE practices a company implements now are periodically reviewed and updated to reflect evolving industry best practices. For a comprehensive list of additional seafood KDE lists and initiatives, please refer to FishWise's "Key Data Elements for Seafood: A Compilation of Resources" report. FishWise also developed "Social Responsibility for Seafood Supply Chains: A Compilation of Resources," which summarizes practices and additional information related to social responsibility, worker well-being, and human rights in seafood.

1 & 2: EU AND U.S. IUU IMPORT REGULATIONS

While varying company needs necessitate an adaptive approach when developing KDE policies and practices, all companies are well advised to be prepared to meet the requirements of rapidly emerging international norms governing seafood trade, such as the U.S. Seafood Import Monitoring Program and the EU IUU Regulation. We suggest first referring to these regulations for both substantive and procedural KDE requirements, so that company data systems are updated to receive, store, and exchange the required data within supply chains. From there, additional KDE requirements can be layered into company systems as dictated by evolving best practices and company policies (e.g. to

assess the sustainability of products, measure progress against a sourcing policy, conduct risk assessments).

3: THE COMMON VISION FOR SUSTAINABLE SEAFOOD

The Conservation Alliance for Seafood Solutions' [Common Vision for Sustainable Seafood](#) was created to help businesses representing 80% of the North American grocery and institutional food service markets deliver on sustainability commitments. Alliance members updated the Common Vision in 2016 to include an initial list of KDEs that companies should collect and monitor about their seafood products. This KDE list includes "basic information" to collect about products, as well as "additional important information" to support specific company initiatives.

It is important to note that the Common Vision KDEs were developed before the U.S. Seafood Import Monitoring Program (and other emerging seafood traceability initiatives were established), and have not been updated at this time to reflect the new U.S. requirements. The recommendations and other KDE sources outlined in this document, including the Common Vision's "additional important information", are more indicative of current and emerging expectations and industry practices than the KDEs in the "basic information" list. It will be important that the Alliance periodically update the Common Vision list to ensure alignment with current regulatory and industry KDE lists.

4: THE EXPERT PANEL ON LEGAL AND TRACEABLE WILD FISH PRODUCTS

While the EU Regulation and the U.S. Seafood Import Monitoring Program provide a strong starting point, companies should continue to pursue best practices when it comes to KDE implementation. One resource for understanding the evolution of norms and practices around seafood traceability is the 2015 [report](#) of the Expert Panel on Legal and Traceable Wild Fish Products (EPLAT), which provides a set of recommendations for both private sector and public policy action to ensure the legality and sustainability of wild-caught fish products. The report includes an appendix of sample KDEs relevant for documenting legally caught and landed fish as they move through the critical tracking events in seafood production and trade. We suggest companies refer to the EPLAT report to gain an understanding of KDE best practices for wild-caught fish products. Because there is no equivalent best practice report for aquaculture products at this time, we suggest that companies refer to the Common Vision KDEs (both the basic KDE list and the additional list of KDEs) for current best practices for aquaculture KDEs.

5: DEVELOPING AN INTEROPERABLE SEAFOOD TRACEABILITY TECHNOLOGY ARCHITECTURE

The Institute of Food Technologists (IFT) Global Food Traceability Center (GFTC) is helping the seafood industry develop, within the Global Dialogue, an interoperable seafood traceability technology architecture that will help enable global interoperable seafood traceability and provide the technological framework that the seafood industry currently lacks. In 2016, GFTC published a [peer-reviewed scientific article](#) on the subject, including a list of KDEs (developed through a multi-stakeholder technical advisory group) based on food safety, food quality, food sustainability and food fraud considerations, and that reflect current practices in the seafood industry.

The paper differentiates seafood KDEs into "importance rankings" - those that are essential for traceability and thus should be exchanged between trading partners (A), those that are essential for traceability but need only be collected for internal business purposes and be available upon request (B), and those that are optional for value-added purposes (C). A similar process is also unfolding within the context of the USAID Oceans and Fisheries Partnership catch documentation and traceability architecture project, with which several members of our collaboration are actively involved.