



IFFO RS Technical Advisory Committee

Factory Criteria Subcommittee

Minutes of the third Meeting

IFFO Head Office, Unit C, Printworks, 22 Amelia Street, London, SE17 3BZ

Members	Representation	Country
Estelle Brennan (EB)	Lyons Seafood (Fish Processor)	UK/ Asia
Frank Trearty (FT)	United Fisheries Industries (Marine Ingredient Producer)	UK
Michel Fransen (MF)	Aquaculture Stewardship Council (Aquaculture/Standard holder)	World
Tiitia Sjenitzer	Marine Stewardship Council (Fisheries/Standard holder)	World
Francisco Aldon (FA)	IFFO RS (Marine ingredients/Standard holder)	World
Trygve Berg-Lea (TBL)	Skretting (Feed Manufacturer)	Norway
Observers		
Andrew Jackson (AJ)	IFFO RS Governance Board	UK
Mike Platt (MP)	Independent consultant	UK
Samuel Peacock (SP)	Independent consultant	UK
Nick Knightly	Ethical Trading Initiative	UK
Laura Shepherd	IFFO RS Secretariat	UK

Apologises:

Beatrice Petit (BP)	Olvea Group (Fish oil processor)	France/Africa
Huw Thomas (HT)	Morrisons (Retailer)	UK/ Asia
Tracy Cambridge (TC)	World Wildlife Fund (E-NGO)	World

Agenda

9:30 Welcome & Introductions

9:45 Update on the IFFO RS Version 2.0 Development

Introduction to the IFFO RS V2.0 Factory Standard – List of Documents

Objectives of the Meeting

10:15 Presentation and discussion on Factory Criteria using Document B and C

Presentation and discussion on Factory Criteria using Document D

AOB

12:00 Next Steps

12:30 Close

**RESPONSIBLE
SUPPLY**

IFFO

RS

ASSURED



Welcome and Introductions

Meeting opened at 9:30am GMT +1 and members were welcomed by FA chairman of the IFFO RS TAC. Apologies from BP, HT and TC were presented.

Objectives of the TAC meeting

To discuss documents B, C and D of the IFFO RS V2.0 Factory Standard.

Action: *To send TAC meeting minutes to all TAC members and to gain feedback on documents B, C and D from all. Updated documents will then be circulated by the end of March.*

Overview of Document B discussion

Discussion: **The language/interpretation of the document.**

Decision: The principal take away for document B is that the main focus is to be on the language of the document. It must be transparent for a clear interpretation from both native and foreign speakers of English.

Action: *TAC members are to look at Document B and get **all** feedback back to IFFO RS by the end of February (29th February) with the possible extension of the beginning of March (4th March).*

Action: *IFFO RS will then re-draft the document taking into account all comments and circulate the updated document by the end of March (31st March).*

Discussion: **IUU needs more traceability, whole fish in particular.**

Decision: This could be proved by the vessels providing their registration number / permit of the vessel (when landing) so that the receiving company may keep track. Checking that any vessels that come in don't appear on the black list, if they do then the company needs to be assessed in how they deal with this e.g. do they have measures / training in place or do they accept the materials on board without questioning?

This needs to be a country by country risk assessment basis. If a country has a well-known high risk of IUU vessels, then companies in this country would need to prove that they are not receiving fish from an IUU vessel. In a country that has a very low risk, to avoid them having to have a lengthier audit for no reason, would not need to provide this evidence unless it is specifically thought that they may be receiving IUU materials.

Overview of Document C discussion

Discussion: It was discussed that certain clauses in document C exceed GMP+ and some don't quite come up to the mark.

Decision: For the clauses that partially cover the GMP we should look to improve clauses that don't quite hit the same benchmark (when comparing the original 2009 draft IFFO RS Factory clauses to the most recent (2015) version of GMP+)

Discussion: Accredited labs– Should we change this to match the GMP+? Maybe a tick box method again to show that it is an approved lab, and if not and it is instead an in-house lab, how would auditors then proceed?

Action: To be discussed further.

Discussion: This document should focus more around Food Safety (HACCP)

Decision: Document C we should focus more around food safety (HACCP) but not to go above a food safety standard – as this isn't what IFFO RS is).

Action: Trybve is to refer to his colleagues in the feed safety sector and ask them to look at Document C and highlight ALL ESSENTIAL points (with the aim of us including these in the IFFO RS Standard).

Discussion: Governmental clauses regarding Food Safety.

Decision: It was agreed that IFFO RS is not to rely on governmental clauses with regards to feed safety as they vary a lot and in some cases it isn't very well regulated.

Action: IFFO RS is to get in touch with as many Feed Producer Companies as possible for Document C feedback. We are looking to get feedback back by the beginning of March (4th March).

Action: IFFO RS will then re-draft the document taking into account all comments and circulate the updated document by the end of March (31st March).

Action: To send document C to fishmeal and oil producers (especially from Peru and Chile) for comments with emphasis on FO for DHC.

Overview of Document D discussion

Discussion: How to bring FOP (Fair Operating Practices - anti-corruption) and Supply Chain Responsibility (is the effort of producer to influence responsible behaviour on the value chain) into the standard without become too much of a social standard

Decision: These issues are far too important to ignore, but must only be included to cover the basics to show that the Standard is aware and does not approve of corruption etc. However, FOP's and Supply Chain Responsibility would be very difficult prove (and assess in audit) but a possible solution of a tick box strategy may help. For example,

Training in anti-corruption? (evidence: certificate of training)	✓
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Decision: Maybe also add 1 or 2 clauses referring to Supply Chain responsibility to be adhered to. For example, the encouragement of vessel schemes and the signing of landings from vessels (similar to that of IUU) and encouragement to look schemes such as RFS (Responsible Fishing Scheme).

Decision: The MSC actually has clause that touches upon this subject and so it was suggested that maybe we can adopt something similar (continuing with the idea of homogenising standards).

Decision: The base code of ETI (Ethical Trade Initiative) may be a good way to go, possibly looking more at the 'principles of implementation'. We would then need to think about how auditors would actually need to audit and what the criteria would be like.

Decision: With regards to risk assessment, it was suggested that we could use the Risk Assessment Tool, created by Katrina Nakamura from Sea Fish.

Action: To include 1 or 2 clauses in the standard referring to FOP (Fair Operating Practices) and Supply Chain responsibility.

Action: To follow up with further information regarding the ETI

Discussion: Taking all references to IFIS out of all Documents and the IFFO RS standard as the last revision was in 2007 giving an indication that some aspects may no longer be relevant.

Decision: Agreed. The next step having done this would be that all GMP+, FEMAS, Deutsch HACCP etc. would need to be listed.

Action: Carry out a piece of work for each (Standards such as GMP+, FEMAS, PAC) to assess their equivalency (to IFFO RS) and to prove to others that this has carried out.

Action: To upload PAC benchmark studies to the website.

Action: Alignment to the Feed Standard (ASC – Aquaculture Stewardship Council) is to be discussed at a later date.

Discussion: Slavery issues, it was noted that all companies in the UK producing over £36 million are going to have to producing anti-slavery report.

Decision: Again, with regards to this, it may have to be a risk assessment basis and it was also thought that these points relate more to the Fishery approval area as it is more to do with the Raw Material rather than the factory itself.

Action: To source further comments regarding Document D and return for discussion and re-draft.

Action: To include some social aspects regarding slavery issues into the fishery approval area of the standard.

Additional discussions

Discussion: To increase accessibility without watering down the standard in the process.

Decision: Agreed

Discussion: Better proof of origin for vessels

Decision: Agreed

Action: A document is to be produced for the origin of marine ingredients batches to facilitate applicants with an easier way of proving the origin of their batch. This at some point may be written as part of the requirement.

Close

Meeting closed at 12:30

Action Point	Responsible	Status
<i>To send TAC meeting minutes and presentation to all TAC Members.</i>	IFFO RS	Complete
<i>Gain feedback on documents B, C and D from TAC Members.</i>	All TAC members	Complete
<i>All documents will be circulated post end of March re-drafting.</i>	IFFO RS	Complete
<i>To later discuss the proceedings of audit for in-house laboratories.</i>	All TAC members	Complete
<i>Trybve to refer to his colleagues in the feed safety sector and ask them to look at Document C and highlight ALL ESSENTIAL points (with the aim of us including these in the IFFO RS Standard).</i>	TBL	Complete
<i>Get in touch with as many Feed Producer Companies as possible for Document C feedback. We are looking to get feedback back by the beginning of March (4th March).</i>	IFFO RS	Complete
<i>IFFO RS will then re-draft the document taking into account all comments and circulate the updated document by the end of March (31st March).</i>	IFFO RS	Complete
<i>To send document C to fishmeal and oil producers (especially from Peru and Chile) for comments with emphasis on FO for DHC.</i>	IFFO RS	Complete
<i>Re-draft the document C taking into account all comments and by the end of March (31st March) to then be circulated afterwards to all TAC Members.</i>	IFFO RS	Complete
<i>To include 1 or 2 clauses in the standard referring to FOP (Fair Operating Practices) and Supply Chain responsibility.</i>	IFFO RS	Complete

<i>To follow up with further information regarding the ETI.</i>	NK	Complete
<i>Carry out a piece of work for each (Standards such as GMP+, FEMAS, PAC) to assess their equivalency (to IFFO RS) and to prove to others that this has carried out.</i>	IFFO RS	Complete
<i>To upload PAC benchmark studies to the website.</i>	IFFO RS	Complete
<i>Alignment to the Feed Standard (ASC – Aquaculture Stewardship Council) is to be discussed at a later date.</i>	All TAC members	Complete
<i>To source further comments regarding Document D and return for discussion and re-draft.</i>	IFFO RS	Complete
<i>To include some social aspects regarding slavery issues into the fishery approval area of the standard.</i>	IFFO RS	Complete
<i>A document is to be produced for the origin of marine ingredients batches to facilitate applicants with an easier way of proving the origin of their batch. This at some point may be written as part of the requirement.</i>	IFFO RS	Ongoing

