



IFFO RS Technical Advisory Committee

Factory Criteria Comments

Minutes of the Fourth Meeting

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

Members	Representation	Country
Blake Lee-Harwood	Sustainable Fisheries Partnership (E-NGO)	World
Frank Trearty (FT)	United Fisheries Industries (Marine Ingredient Producer)	UK
Michel Fransen (MF)	Aquaculture Stewardship Council (Aquaculture/Standard holder)	World
Wendy Banta (WB)	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
Søren Anker Pederson (SAP)	Marine Ingredients Denmark (Fisheries)	Denmark
Duncan Leadbitter	Fish Matter (E-NGO)	SE Asia
Observers		
Mike Platt (MP)	Independent consultant	UK
Samuel Peacock (SP)	Independent consultant	UK
Laura Shepherd (LS)	IFFO RS Secretariat	UK

Apologies:

Beatrice Petit	Olvea Group (Fish oil processor)	France/Africa
Estelle Brennan (EB)	Lyons Seafood (Fish Processor)	UK/Asia
Huw Thomas (HT)	Morrisons (Retailer)	UK/Asia
Tracey Cambridge (TC)	World Wildlife Fund (E-NGO)	World

Objectives of the TAC meeting

To discuss all comments raised on the IFFO RS Factory Clause Review Document for V2.0 of the Factory Standard.

Action: *To send TAC meeting minutes to all TAC members and use the final draft of the clauses for the V2.0 trials to be conducted in Peru and Europe.*

Overview of Document: Section 5 – Social Accountability

Discussion: Comments on 5.x.

Decision: Providing evidence at the factory stage would be difficult and so it would be best instead to consider vessel-related social requirements at the fishery assessment stage.

Action: *Remove 5.x from the factory clauses and place this (or similar vessel-related social components) in the fishery part of the standard.*

Discussion: Comments on 5.3

Decision: Change of wording. Rather than violations, wording such as accident or incident should be used

Action: *Remove the wording of ‘violation’ in 5.3 and replace it with something more appropriate such as accident or incident.*

Discussion: Comments on 5.4

Decision: Employees’ representative, particularly with regards to health and safety, does not necessarily need to be elected but could also be appointed.

Action: *Clarify in the guidance and/or main text as appropriate.*

Discussion: Social Accountability section as a whole

Decision: This section should not be too generic but at the same time it should specify a minimum bar to adhere to and the trials that are to be conducted in Peru will help to indicate how the legal compliance compares to that of the EU.

Action: To ensure that this section is technical and includes the fundamental elements (legal compliance) of social accountability.

Action: To try the Health & Safety clauses in Peru and UK plants

Discussion: Comments on 5.5

Decision /Action: To keep clause 5.5 for the trials and see how the practicalities of this are returning with findings to present for further discussion with TAC.

Decision /Action: To change 24 months to 3 years to keep with documentation retention consistency. Applicable to clause 5.5 and elsewhere in the Standard.

Discussion: Comments on 5.6, 5.7, 5.8, 5.9

Decision: The points are extremely specific. In the interest of reducing the specificity, if there is no national policy in place for social accountability then the plant/factory will be required to have their own social accountability in place.

Action: Take comments on board during the trial and come back to these points once the trials have been completed. Suggest a change to 5.1 to cover these requirements

Overview of Document: Section 7 – Environmental Accountability

Discussion: Comments on 7.4, 7.5 & 7.6

Decision: To revisit points 7.4, 7.5 and 7.6 after the trials have been conducted.

Action: To consider these clauses during the trial for use as non-scored clauses, for eventual inclusion as scored clauses in future versions (e.g. Version 3).

Action: To add an explanation why these clauses are not scored in Version 2.

Discussion: Comments on 7.1 & 7.2

Decision: To possibly replace these clauses with the requirement of a management plan. If national legislation doesn't exist then the plant/factory will be required to have their own legislation in place. These points will then be revisited after the trials with findings to then compose what should be the minimum base requirements. Also to consider implementing universal levels (for, e.g., maximum emissions, noise

pollution) rather than allowing minimum requirements to vary according to the national legislation of the country where the applicant is based.

Action: *To assess these clauses during the trial and draft an interpretation document to ensure that these clauses are applied fairly across all applicants irrespective of nationality.*

Action: *To look at reintroducing clause 6.2 and application of number changes i.e., 7.3 to become 7.1*

Action: *FT to send MP spreadsheet to calculate CO²*

Overview of Document: Section 8 – Legislative compliance

Discussion: **How easily is proof of compliance to these clauses, how easy/difficult it is to audit and what value this section adds to the standard.**

Action: *To remove this section however have a pre-requisite that the applicant must be legally upholding of any legislative compliance that may relate to the applicant otherwise there is a risk that the certificate may be removed if evidence is found of non-compliance.*

Overview of Document: Section 9 – Local Community Engagement

Discussion: **The wording of 9.2**

Decision/Action: *Remove the wording ‘and meaningful consultation and’ from clause 9.2*

Overview of Document: Section 3

Discussion: **Comments on 3.1.1 regarding wording issue**

Decision/Action: *To add ‘recognised equivalent’*

Discussion: **Comments on 3.2**

Decision/Action: *Those not certified to IFIS recognised or IFFO RS GB recognised standards, the applicant would simply follow section 3.2 as an alternative means to demonstrate responsible manufacturing practices.*

Overview of Document: General Comments

Discussion: Non IFFO RS products that can be produced.

Decision: Companies need to provide very strong evidence/systems in place to ensure that the non IFFO RS products can be kept separate. Should the minimum requirements that are outlined (*such as no IUU's etc*) not be met they must then be added to the Improvers Programme to show that they are working towards IFFO RS approval for the whole fish or by-product in question.

Action: *Mass balance testing to look into the practicalities*

Action: *Create and propose what would be the minimum requirements would be when allowing non IFFO RS approved raw material through.*

Action Point	Responsible	Status
<i>Send TAC meeting minutes to all TAC members and use the final draft of the clauses for the V2.0 trials to be conducted in Peru and Europe.</i>	IFFO RS	Complete
<i>Remove 5.x from the factory clauses and place this (or similar vessel-related social components) in the fishery part of the standard.</i>	IFFO RS	Complete
<i>Remove the wording of 'violation' in 5.3 and replace it with something more appropriate.</i>	IFFO RS	Complete
<i>Clarify in the guidance and/or main text as appropriate</i>	IFFO RS	Complete
<i>To ensure that this section is technical and includes the fundamental elements (legal compliance) of social accountability.</i>	IFFO RS	Complete
<i>To try the Health & Safety clauses in Peru and UK plants.</i>	IFFO RS	Peru complete. Pending further Pilot.

<i>To keep clause 5.5 for the trials and see how the practicalities of this are returning with findings to present for further discussion with TAC.</i>	IFFO RS	Complete
<i>To change 24 months to 3 years to keep with documentation retention consistency. Applicable to clause 5.5 and elsewhere in the standard</i>	IFFO RS	Complete
<i>Take comments on board during the trial and come back to these points once the trials have been completed. Suggest a change to 5.1 to cover these requirements</i>	IFFO RS	Complete
<i>To consider clauses 7.4, 7.5 and 7.6 during the trial for use as non-scored clauses, for eventual inclusion as scored clauses in the future.</i>	IFFO RS	Complete
<i>To add an explanation why clauses 7.4, 7.5 and 7.6 are not scored Version 2.</i>	IFFO RS	To be completed
<i>To assess clauses 7.4, 7.5 and 7.6 during the trial and draft an interpretation document to ensure that these clauses are applied fairly across all applicants irrespective of nationality.</i>	IFFO RS	Trial complete. Interpretation document in process
<i>To look at reintroducing clause 6.2 and application of number changes ie, 7.3 to become 7.1</i>	IFFO RS	Complete
<i>FT to send MP spreadsheet to calculate CO²</i>	FT	Complete
<i>To remove section 8, however, there should be a pre-requisite that the applicant must be legally upholding of any legislative compliance that may relate to the applicant otherwise there is a risk that the certificate may be removed if evidence is found of non-compliance</i>	IFFO RS	This will be added into the foreword of the standard
<i>Remove the wording ‘and meaningful consultation and’ from clause 9.2</i>	IFFO RS	Complete
<i>Mass balance testing to be conducted as companies need to provide very strong evidence/systems in place to ensure that the non IFFO RS products can be kept separate.</i>	IFFO RS	In process

<p><i>Create and propose what would be the minimum requirements when allowing non IFFO RS approved raw material through</i></p>	<p>IFFO RS</p>	<p>To be discussed with the Governance Board</p>
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