



PAS 1550:2017

Exercising due diligence in establishing the legal origin of seafood products and marine ingredients.

PAS Overview & Implementation Guide

Presentation to EU IUU Fishing Coalition event

17th November 2022

This is a preview. To view the full content, please purchase this document.

PAS 1550:2017

Exercising due diligence in establishing the legal origin of seafood products and marine ingredients –
Importing and processing –
Code of practice



Agenda

- **Background and development of the PAS Code of Practice**
- **Baseline fundamentals upon which PAS is built**
- **Implementation guidance notes**
- **Deeper dive flow diagrams**
- **Operationalising PAS**
- **Q and A**



Background

- Developed with industry by WWF, EJF, Pew and Oceana (EU IUU Coalition)
- Builds on previous retailers IUU Advisory Note
 - Adds: **working conditions** and **traceability**
- Primary audience is importers and processors
- Status: **publicly available standard (PAS)**
 - “pre-standard”
 - managed by British Standards Institute (bsi)



Produced by consensus with Steering Group

- British Retail Consortium (BRC)
- ClientEarth
- Environmental Justice Foundation (EJF)
- FishWise
- Food and Drink Federation (FDF)
- Human Rights at Sea (HRAS)
- Lovering Foods Ltd.
- Marine Management Organisation (MMO)
- MRAG Ltd.
- Morrisons
- Oceana
- The Pew Charitable Trusts (Pew)
- Seafish
- UK Seafood Industry Alliance
- Tesco Stores Limited
- WWF

Input also from wider review panel during open consultation

- ▶ **Market controls**
- ▶ **Data**
- ▶ **Traceability**
- ▶ **Verification**

FOUR FUNDAMENTALS OF PAS 1550



Market controls

Analysis of supply chains

Vessels should not be flagged to or licensed to fish by red-carded states

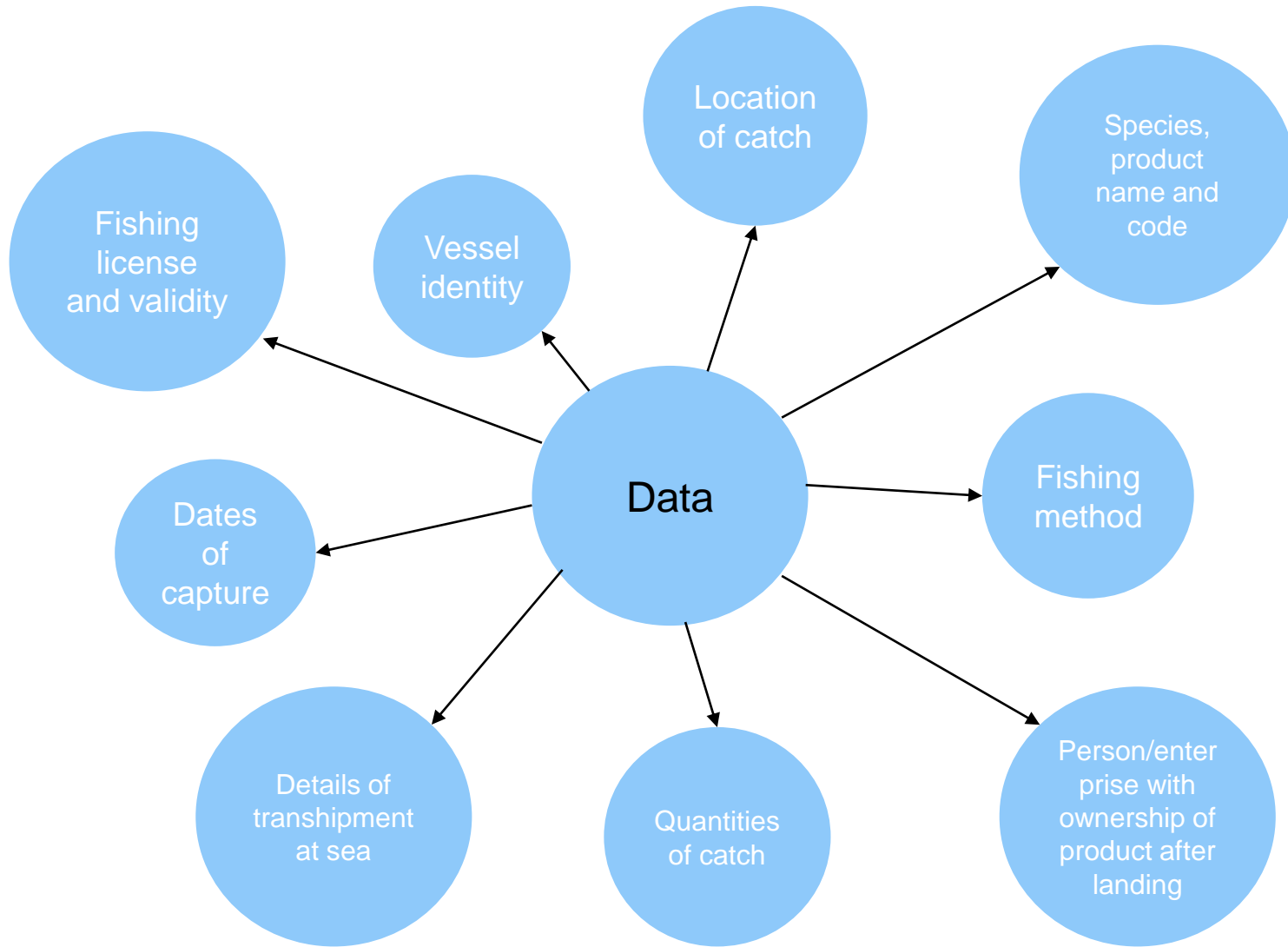
Purchases should not be made by a flag country that has not notified the EU of its competent authorities

Full chain traceability and audits at a minimum of once every 12 months should be applied for yellow-carded

EU IUU and other catch certificates provide transshipment information

Port(s) where purchased seafood is landed is party to/implements FAO's Port State Measures Agreement

Measures to check:
Port designation, dockside inspections, denial of entry, information sharing



To ensure a strong traceability system:

- ✓ Data must be verified
- ✓ Data must be subject to external verification/independent audits
- ✓ Data should go all the way to the vessel
- ✓ Carry out random trace-back exercises
- ✓ Match sales transactions e.g., by using batch numbers on invoices
- ✓ Ensure information is available on request
- ✓ Product information maintained on an electronic system



EUROPEAN COMMUNITY RE-EXPORT CERTIFICATE			
Certificate number	Date	Member State	
1. Description of re-exported product		Weight (kg)	
Species	Product code	Balance from total quantity declared in the catch certificate	
2. Name of re-exporter	Address	Signature	Date
3. Authority			
Name/Title	Signature	Date	Seal/Stamp
4. Re-export control			
Place	Re-export authorised (✓)	Verification requested (✓)	Re-export declaration number and date
(*) Tick as appropriate			



In addition, the following items are not required as part of the EU catch certificate but can be collected as good practice:

1. Identity of vessel owner/operator
2. Fishing authorisation/permit
3. Catch composition data (i.e. non-target species, discards)
4. Habitat impacts
5. Monitoring on board the vessel (e.g. observers, CCTV)
6. Transformation of fish prior to landing

Tools which aid traceability and transparency:

Monitoring,
Control and
surveillance
(VMS, AIS)

Logbooks

At sea
inspections

Observers,
REM

Purchasing
standards

Third party
certification

Port state
controls

DNA testing

What has been happening?

- Guidance notes for PAS developed
- Industry feedback
- “Benchmarked” against RFVS, GDST and OPAGAC APR
- Implementation guide, flow diagrams, useful resources for use in risk assessment developed
- Development of data collection framework and user guide

Implementation Guide

Split into 3 levels of practice

- **Base level** (targeting those just starting)
 - Develop policy, communicate it, begin thinking about implementing
- **Implementing or PAS compliant** (those on the journey)
 - Implementing - Policy acknowledged by suppliers, data collection started, risk assessment processing developed or being developed
 - Compliant – risk assessment ongoing, supply chains being categorised and improvements ongoing or being developed, advocacy commonplace
- **Aspirational** (nearing the end and managing exception)
 - Transparent supply chain of low-risk sources, with improvements and advocacy demonstrated and KDEs communicated digitally

Implementation Guide Example

3.1 General	Base practice	Implementation of PAS/ PAS Compliant	Aspirational practice
<p>3.1.1 Does the organization have systems in place to manage critical aspects of legality? <i>These should comply with requirements such as the EU IUU Regulation, relevant policy, standards and labour conventions. These systems should include traceability, processes, information verification and transparency.</i></p>	<p>A company sourcing policy explicitly stating its' desire to avoid buying IUU fish which also makes reference to the Modern Slavery Act (if UK based) or other relevant statutory due diligence requirements is written and available. The policy includes the desire to engage with the supply chain to transition/ improve supply chains that once risk assessed identify the for need improvement. The policy has been communicated to all suppliers and basic procedures to check product, supply chain (incl EU IUU Regulation Catch certs), vessels, and suppliers are legal as far as it is practical to check</p>	<p>A management system is in place that includes processes to manage information verification and traceability. Where practical a 3rd party audit of management system (e.g. BRC, IFS or GSA) processing standard to ensure traceability are in place. The company is a member of GDST and is working with suppliers to capture the relevant KDE's.</p>	<p>Full supply chain transparency is achieved with public reporting of policy, practices, supply chains. Full supply chain reporting traceability using the GDST data requirements</p>
<p>3.1.2 Do the managers of the organization engage on improvement work with other suppliers or actors in the supply chain (e.g. audits, reviews, site visits, etc.)?</p>	<p>A list containing all products and (stock keeping units / SKUs) is available within the business which details basic information of source fishery and supply chain. Sufficient information to being collected to warrant that the seafood being purchased is legally caught and that when being sold is being labelled accurately. All suppliers have received copies of the company policies and internally risk assessment process are either being considered, in the process of being developed or an existing mechanism adopted so that where needed supply chain improvements can be identified</p>	<p>The company seafood sourcing policy is formally acknowledged by all suppliers. The list of products and suppliers has been risk assessed and categorised into high, medium or low risk according to the company policy, with high risk products and high risk suppliers having either written and agreed improvement plans or are working to have agreed plans within an agreed timeframe. Audits of high risk supply chains are taking place ideally using third parties or are being arranged</p>	<p>All SKUs have been risk assessed, all high risk products have been mitigated so that the majority of sources are low or medium risk . All suppliers are working to achieve sustained low risk categorisation with routine risk assessment and monitoring systems established to maintain this.</p>

Flow Diagram Example

PAS:1550 - VMS AIS Flow Diagram v2

Don't know answer: If you don't know the answer to a question, you should launch a formal investigation or seek expert help to answer it.

LEGEND

Risk assessment consideration

Required

Aligns with GDST

Condition satisfied. Proceed

Condition not satisfied. Action required

Proceed in line with risk assessment

4.4.3.g Does the flag state have VMS & AIS requirements in its licensing and fishing

HOLDER: BASE PRACTICE

Yes

No

Advocate for their use within your supply chain.

HOLDER: BASE PRACTICE

Are all vessels required to use VMS/ AIS doing

HOLDER: BASE PRACTICE

Yes

No

Advocate for their use within your supply chain.

HOLDER: BASE PRACTICE

Are data network identity (DNID) numbers mandated to groups of vessels?

HOLDER: Rest are COMPLIANT PRACTICE.

Yes

No

See blue box.

3.4.10, 4.4.3.a & b Do you know the unique identifiers for each vessel in your supply

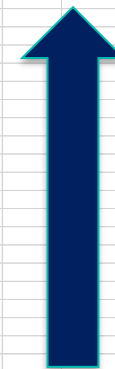
Yes

No

Find out what they are.

Is the VMS data centralised with data routinely shared with coastal and or port states?

At each stage when an element of policy is either not mandated for, or is insufficiently implemented for it to have any positive impact to reduce IUU consider you, and/or your supply chain advocating for this to happen



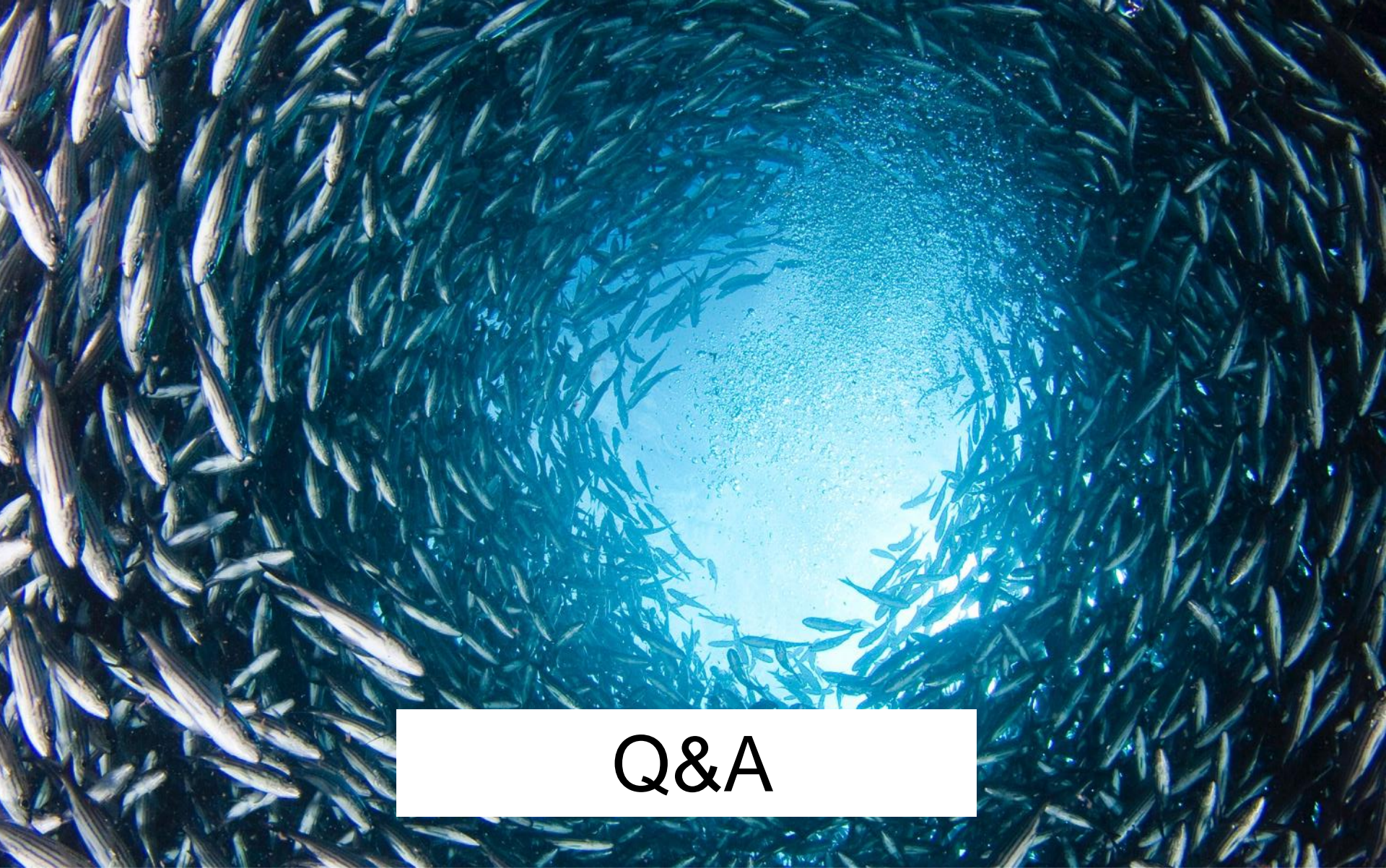
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How can PAS 1550 help?

- a. *Provides framework to know your vessels*
- b. *Clearly defines risk indicators and information sources*
- c. *Tools can be used to make risk assessments routine*

PAS 1550 y nuevas herramientas traducidas al español

https://www.iuuwatch.eu/wp-content/uploads/2022/11/PAS_1550_2017-ES_FINAL.pdf



Q&A