



CAMPBELL BROTHERS SUSTAINABILITY POLICY

2021 | 2022



Campbell
BROTHERS
FISH

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We have been at the forefront of sustainable practices since the market awoke to the need to preserve seafood stocks for future generations. We have worked with several non-governmental organisations (NGOs) in both the wild and farmed seafood sectors. This work has led to us having an intimate understanding of the issues involved in the sustainable discussion, and the positive and negative impacts of implementing a sustainable programme.

The outcome of this has been the establishment of our guiding principles:

- We work with chefs to guide them away from less sustainable species. This process may take time, so we continue to work with chefs on their existing menus during any transitional period. This allows for dialogue to continue, thus leading to a positive outcome.
- Wherever possible, we source from certified fisheries.
- We work with small fisheries to support local ecosystems.
- We engage with all NGOs to positively improve the fishing industry, and to improve fishing practices. This is fundamental to support sustainable fisheries for future generations.
- Certain species that are considered endangered (taking guidance from the Marine Conservation Society), we refuse to sell.

In addition to the search for sustainable sourcing solutions, we have also focused on ensuring that our solutions are ethical. To that extent, we have adopted the guidelines from the Ethical Trading Initiative (ETI). We have aimed to comply with the ETI base code and require all our suppliers to complete Ethical questionnaires and sign up to this base code prior to approval.

We aim to have a fully sustainable and ethical supply chain. However, we are aware that this is not a goal, but a process that needs constant attention. We are in that process for the long haul!

We acknowledge that there are many inherent difficulties in the seafood industry, both in wild caught and aquaculture, but also believe there is a growing awareness of the issues. As an organisation, we are convinced that a step-by-step approach to sustainable change is the most effective way of improving every aspect of our business.

The four key areas of focus are:

SOURCING: Good sourcing is the driving force of good supply.

Avoid the worst: We actively remove seafood that we believe is an unacceptable risk, both in terms of seafood sustainability and social ethics.

Encourage the best: We encourage the use of seafood that is fished or farmed to the highest standard of "best practice" wherever possible, seeking out fisheries with third party certification.

Improve the rest: We work hard with our fisheries, NGOs, and Fishing Organisations to seek out the most responsible fisheries for each specific species. We will only sell wild seafood that is traceable back to the vessel that caught it, with evidence that the catch is in quota, and that we believe has been sustainably caught.

ADVISOR: We believe that as a responsible supplier, one of our key roles is that of an advisor not educator.

We dedicate a considerable amount of resource to developing our employees' understanding of the complexity of the issues surrounding sustainability and socially responsible sourcing. Our teams are given quarterly updates via our Catch-Up report which features current issues affecting the industry. This ensures they are actively asking the necessary relevant questions of suppliers, and are able to give coherent, well understood, answers to our customers.

We are committed to helping our customers take the necessary steps towards a sustainable future by promoting the best and removing the worst. We do this with the help of literature, workshops, bespoke training, and advice.

COLLABORATION: We know that whatever our own beliefs and aspirations for sustainability are, the achievement of these aims is only possible by working with other like-minded people through collaboration. We actively work with other organisations including retailers, NGOs, trade associations, and government bodies, to better understand and further drive the sustainability message.

INVESTING IN THE FUTURE: Our commitment to sustainability is hardwired into every aspect of the business. We have historically been involved in several long-term industry defining programs, like the MSC's Project UK.

In conclusion, we recognise that changing the structure of a supply chain is a long, difficult, and complex task. **Long** - because changes can often take years to take effect. **Difficult** - because we are affecting people's livelihoods (often their only source of income). Shifting to sustainable methods often increases costs, which few in the supply chain are willing to bear. **Complex** - because there is often no consensus as to the sustainability of a fishery.

We recognise that the journey to sustainability is a long, difficult, and complex one. However, we are determined to lead the field in the foodservice sector, whilst actively encouraging our customers to join this challenging voyage to maintain our fishing stocks for years to come.

Managing Director, Bidfresh Limited.

Campbell Brothers is engaged with a number of NGOs and organisations.

Social Welfare

SEAA

The Seafood Ethics Action Alliance provides a platform for businesses to work together to share information on emerging issues and agree solutions.

The SEA Alliance has been established by seafood businesses. It provides a platform for industry to agree best practice solutions, to respond to ethical issues in the supply chain and to enable pre-competitive action. It does this via meetings, information sharing between members, and where needed, the creation of working groups to work together on the required actions.

This work reflects the PAS 1550:2017 Code of Practice on Exercising due diligence in establishing the legal origin of seafood products and marine ingredients. It also takes into account the BRC IUU Advisory Note (2015), together with meaningful implementation of the ILO 188 Work in Fishing Convention and other appropriate instruments.

The SEA Alliance has recently been awarded (May 2021) a grant from the David and Lucile Packard Foundation to support their work to increase industry leadership and encourage positive change in human rights issues across the seafood supply chains of UK companies. This is a time of change for seafood companies in the UK, so this funding arrives at a very opportune time, and is a fantastic opportunity for all of us. This funding creates an opportunity for the SEA Alliance to support participating businesses to better understand human rights risks in fisheries. We are keen for all of us to benefit from this.

SEA Alliance activities build on the work of the Seafood Ethics Common Language Group.

<https://www.seafish.org/responsible-sourcing/social-responsibility-in-seafood/#z-seafood-ethics-action-alliance-sea-alliance-4>



Advisory

Sustainable Seafood Coalition

“The Sustainable Seafood Coalition (SSC) is the first ever cross-industry group in the UK to tackle seafood sustainability using their influence as a seafood business. They are united in a vision for sustainable seafood and have pledged to work together to achieve this. This means that clients can trust that they are working hard to develop voluntary solutions to the seafood sustainability problems. This involves continuous re-assessment of supply chains to ensure all the fish and seafood supplied is responsible and sustainable.” <https://www.sustainableseafoodcoalition.org/>

We are an active member of this coalition representing the food service sector, and have been instrumental in drawing up the voluntary codes of practice that the SSC will abide by. The first two codes of practice have now been agreed by the members. The codes are ‘Responsible and Sustainable Sourcing’ and ‘Responsible and Sustainable Labelling’. They cover both farmed and wild caught species. The SSC are now close to launching a new code for social ethics to help the industry grapple with the problems of modern slavery and human trafficking worldwide.

This is the first such industry wide coalition of businesses in the world that commits its members to such codes and includes such major retailers such as Marks & Spencer (M&S), Sainsbury’s and Waitrose, as well as food manufacturers like Birds Eye, Igloo, and Young’s Seafood.

Marine Conservation Society

The Marine Conservation Society is the UK charity dedicated to caring for our seas, shores, and wildlife. The MCS campaigns for clean seas and beaches, sustainable fisheries, and protection for all marine life. The MCS aquaculture and fisheries program promotes sustainable seafood consumption through its consumer awareness program and by working directly with the seafood industry. The MCS encourages restaurants to buy sustainable seafood, and to use their skills to serve unusual, sustainable, seafood to customers in an attractive, tasty way, thus helping to relieve pressure on traditional, often over-fished, species.

Recently, the MCS have relaunched their Good Fish Guide which uses a traffic light system to assess and rate the sustainability of both wild and farm caught fish. Using scientific data from numerous sources and specifically ICES (International Council Exploration of the Sea), the MCS updates their ratings twice a year on the MCS website (www.mcsuk.org/goodfishguide/). This easy to use web site, as well as the Good Fish Guide app which can be easily downloaded, is the perfect tool for chefs to use in ensuring they make the best choices in sustainable seafood when developing menus.

Over the years, we have been great supporters of the Marine Conservation Society (MCS), and also use their ratings as a guide to best sourcing practice. We believe that the MCS play a vital role in supporting our message to our customers that sustainability is vitally important to a productive and successful fishing industry that supports the food service sector.

The MCS has specialised in rating species that are commercially valuable to the UK. As such, when we are researching our supply chains we also use a number of other rating sites such as Seafood Watch (www.seafoodwatch.org), an American site set up by the Monterey Bay Aquarium that has a similar system for species more common in the United States. We also use the RASS (Risk Assessment For Sourcing Seafood) that was setup by Seafish to help UK processors, retail and food service gain the necessary information for the most sustainable supply chains.



Certifying the Certifiers

Global Sustainable Seafood Initiative

As seafood production increases to meet rising global demand, so have concerns of members of the seafood supply chain, consumers, and environmental NGOs over the impact that production is having on the environment. One way of providing assurances of more sustainable practices in both aquaculture production and wild capture fisheries is the use of seafood certification schemes. However, the increase in these types of certifications has led to confusion over how to recognise a credible seafood certification organisation scheme. This confusion is making decision-making more difficult, and seafood more costly.

The Global Sustainable Seafood Initiative (GSSI) is a unique solution to this problem. For the first-time, members of the seafood supply chain, NGOs, governmental, and intergovernmental organisations, have come up with a collective, non-competitive approach to provide clarity on seafood certification, thus ensuring consumer confidence in certified seafood. The GSSI has created a benchmarking tool that is based on the FAO Code of Conduct for responsible fisheries. This tool will evaluate which certification schemes are really effective and help us to decide which ones we can rely on to ensure our customers receive the most sustainable fish possible.

Campbell Brothers, along with some of its customers, are using the certifiers benchmarked by the GSSI scheme as the core schemes for sourcing seafood both wild and farmed. This helps enhance the powerful message we are trying to deliver.

<http://www.ourgssi.org/>

International Wild Caught Certification

Marine Stewardship Council

The MSC meets best practice guidelines for eco-labelling and certification to ensure it offers the world's leading certification program for sustainable wild-capture seafood.

The MSC follows international, professional benchmarks to promote robust processes. The MSC upholds core values of independence, transparency, impartiality, and stakeholder consultation.

We have now had 'Chain of Custody' certification with the MSC since 2007. We work closely with the MSC. When additions or amendments to any of the MSC standards and requirements are proposed, consultation with stakeholders (such as ourselves) is required as set out in the MSC's standard setting procedures.

We have over the years developed a huge range of MSC certified products to supply everything from simple battered fish and fresh white fish species to the truly luxurious king crabs and lobsters. Their list of both fresh and frozen extends to approximately 100 plus lines to suit everyone's needs.

Local UK Wild Caught Certification and Education

Project UK

We have been an active sponsor of Project UK - a new partnership of retailers, suppliers, non-government organisations (NGOs), and the fishing industry. Together, the partnership is working towards an environmentally sustainable future for UK fisheries. The project, led by UK seafood authority Seafish, is using assessments based on the MSC standard for sustainable fishing to produce tailored sustainability reports for a significant number of fisheries in the UK.

Following on from the success of Project Inshore - which mapped all the inshore fisheries in England to the MSC pre-assessment standard - Project UK is developing an even more ambitious program. This has progressed in two stages.

The three key features of project UK will be to:

- Identify and map all types of fisheries in the UK and, by using the MSC pre-assessment criteria, prioritise those fisheries that are of significant value to the UK supply chain.
- Improve a number of fisheries, identified by project inshore, through the use of Fishery improvement projects to MSC certified standards.
- Certify fisheries identified as being ready to enter assessment, and likely to meet the MSC standard.

Fisheries included in stage one of Project UK include:

- North Sea Plaice - demersal trawl, beam trawl & seine.
- North Sea Lemon Sole - demersal trawl, beam trawl & seine.
- Channel Scallops - dredge.
- Western & Channel Monkfish - demersal trawl, beam trawl, & gill net.
- Southern Crab - pots.
- Southwest Lobster - pots.

Fisheries included in stage two:

- King scallop – North Sea, West of Scotland, and Irish Sea, dredge.
- Nephrops – North Sea, West of Scotland and Irish Sea, demersal trawl and creel/pot.

These reports will deliver a roadmap that highlights best practice, and which provides an independent evidence base to attract targeted investment in further scientific research. For some fisheries, this project may offer the opportunity to enter full assessment for MSC certification. For others, they will have a clear plan to enable them to work towards the benefits of third party certification offered by the MSC.

International Aquaculture Certification

Aquaculture Stewardship Council

The Aquaculture Stewardship Council (ASC) operates a certification and labelling program based around scientifically robust and globally credible standards that assess whether fish farms are operating responsibly. The standards are helping aquaculture become more environmentally sustainable and socially responsible. We are actively involved in seeking out ASC certified products as well as the ASC Chain of Custody.

Seafood products that carry the ASC logo are fully traceable to farms that have been independently certified to the ASC standard via Chain of Custody certification. ASC certified farms have demonstrated that they are well managed and minimise any adverse environmental and social impacts.

As one of the three most important certification programs positively benchmarked by the GSSI, the ASC are rapidly growing the number of farms and species that they are working with and we work directly with a number of farms that carry the certification and are always seeking to expand the range available for our customers.

International Seafood Certification

GSA

The GSA (Global Seafood Alliance) previously known as the Global Aquaculture Alliance, has been developed to encompass the best standards for both wild caught and aquaculture seafood. The journey to the Global Seafood Alliance began in 2018 with the formation of the Global Seafood Assurances to address the gaps in wild caught fishery certification.

“The Global Seafood Assurances is an independent, not-for-profit organization. The GSA vision is to provide high quality, end-to-end, fully traceable assurance for seafood, supporting the sustainable development of global production while protecting people and planet. GSA works with partners where standards already exist, and creates transparent and credible standards to fill gaps where needed. The Responsible Fishing Vessel Standard was developed by GSA, in partnership with Seafish, through a transparent and rigorous two-year process. It enables fishing operations to provide assurance of decent working conditions and operational best practice from catch to shore. GSA took ownership of the RFVS in May 2020.” *seafoodassurances.org*

In addition to all the good work the GSA are doing to improve wild caught seafood standards they have also created the BAP standards that have now been adopted by over two thousand farms world wide in species ranging right across the seafood spectrum. As one of the GSSI recognised schemes We have a long list of certified products - specifically in prawns.

Additionally, Laky Zervudachi has been raising our profile in the sustainable seafood movement at events organised by the GSA. GSA'S GOAL conferences provide an ideal opportunity for us to join other industry leaders and demonstrate its commitment to sustainable sourcing.

International Aquaculture Certification

GLOBAL-G.A.P.

Global G.A.P are a global organisation with a crucial objective: safe, sustainable agriculture worldwide. They set voluntary standards for the certification of agricultural products around the globe—and more and more producers, suppliers and buyers are harmonising their certification standards to match. Globally connecting farmers and brand owners in the production and marketing of safe food to provide reassurance for consumers, they lay the foundation for the protection of scarce resources by the implementation of Good Agricultural Practices, with a promise for a sustainable future.

The GLOBAL-G.A.P. Aquaculture Standard sets criteria for legal compliance, food safety, worker occupational health and safety, animal welfare, and environmental and ecological care. It applies to a diversity of fish, crustaceans, and molluscs, and extends to all hatchery-based farmed species. It covers the entire production chain, from brood stock, seedlings and feed suppliers, to farming, harvesting and processing.

We actively support the GLOBAL GAP standard by using a number of Global GAP certified species, including most of our farmed salmon, sea bass and sea bream.



Statutory Authority

Seafish

As the authority on seafood, Seafish supports a very broad range of work. From the catching sector, through suppliers, and onto food service and retail. Seafish understands the influential role that the supply chain plays in maintaining the reputation of seafood and the industry, and works closely with this sector to support shared goals.

The £1 billion worth of seafood consumed outside the home in 2019 evidences the powerful impact the food service sector can have on the way we source, produce, and eat seafood. By working alongside Seafish and its other industry partners, we are playing a positive role in driving improvement in this, and other, areas.

Seafish has a very clear purpose - to help secure a sustainable and profitable future for the UK seafood industry. The organisation leads a program of work to support industry on its journey to a more responsible future through projects like the Tools for Ethical Seafood Sourcing (TESS) and the Risk Assessment for Sourcing Seafood. As a leading sustainability champion, we strongly support Seafish. We do this by sitting on one of the sector advisory panels that helps direct the board, and by encouraging its work in bringing all industry partners together in the pursuit of responsible sourcing.

Up until mid 2020, Seafish were also developing the Responsible Fishing Scheme now known as the Responsible Fishing Vessel Standard which is now owned and operated by the GSA globally. During its development, Laky Zervudachi was actively involved on the advisory board, helping to develop the scheme on behalf of us and the food service sector and is still involved in the advisory board for the Responsible Fishing Ports Scheme.

Risk Assessment For Sourcing Seafood

Seafish have developed a fisheries risk assessment tool (known as RASS) that will help buyers make an informed judgement on the risks they face when sourcing seafood.

RASS will not tell you which fisheries to source from or which to avoid. It will present up-to-date scientific information on the potential reputational risks of sourcing particular seafood in a clear and structured format. We sit on the RASS steering committee, and uses RASS as one of the tools that informs our procurement policy as it highlights areas of high risk. Consequently, RASS keeps us ahead of the game when making critical decisions in sourcing.

Tools for Ethical Seafood Sourcing

Seafish developed TESS specifically to help seafood buyers investigate their supply chains and better understand country by country and the different methods of fishing where the biggest risks might appear and what questions a seafood buyer should be asking to minimise the risk of poor sourcing.

World Wildlife Fund (WWF)

We continue to support the statement drawn up by the WWF in July 2017 with a number of other well-known companies in the UK which aims to deliver fully sustainable UK seafood. We are proud to be involved in this pioneering work that incentivises increased selectivity, innovation, and best fishing practices.

We have signed up to the WWF's policy, as follows:

Delivering Sustainable UK Seafood

For many years, the government, fishermen, processors, and retailers, have worked together to improve the sustainability of UK seafood. Brexit potentially marks a step change for the UK seafood sector - in which context all concerned need to consider how to deliver sustainable fisheries management and high quality, sustainable, UK seafood, now and for the years to come.

We believe it is important that the government and industry continue to support the adoption of policies and actions that maximise the environmental and social benefits of fisheries and minimise the risks. It is clear that whatever legislation is adopted as the UK exits the EU, it must deliver confidence that UK seafood remains legally and sustainably sourced, and fisheries must operate in accordance with the existing regulations until such time as it is replaced by new fisheries legislation. This includes the continued implementation of the landing obligation which requires fishing vessels to land all catches of specified fish so that they count against quota (where quotas apply), and to be fully documented.

The current outlook for assessed Northeast Atlantic stocks is positive with trends for mortality decreasing, and for biomass increasing. We are proud of these achievements, and need these positive trends to continue and not be undermined as a result of poor implementation. The UK seafood industry believes that:

1. Effective implementation of current legislation, and in time equivalent new UK and devolved law, is essential to ensure the continued biological and economic sustainability of European fisheries, including those MSC certified fisheries.
2. Fully documenting fisheries is an essential tool for successful fisheries management and the attainment of healthy fish stocks.
3. Failing to properly document and account for catches should not be sacrificed because there are implementation challenges in some fleet sectors.

In order to address this, we are willing to support initiatives that will be necessary to support this outcome

These include:

- Increased selectivity in fishing activities - both in terms of fishing practice and gear development.
- Comprehensive and cost-effective monitoring and enforcement of measures - for example the use of remote electronic monitoring.
- Innovation in access to quota.
- Incentivising changes in fishing practices to address potential choke situations.

<https://www.wwf.org.uk/sites/default/files/2018-03/Delivering%20Sustainable%20UK%20Seafood%20Industry%20statement%20final.pdf>



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