



Ruth Westcott
Sustainable Fish Cities

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Written Evidence submitted by Sustainable Fish Cities, part of Sustain, The Alliance for Better Food and Farming.

Submission by Ruth Westcott

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Executive Summary

1. Sustainable Fish Cities works to significantly shift demand in the UK towards sustainable fish buying. We therefore submit evidence of the significant impact that our buying power (in particular Government buying power) can have on our oceans, when clear standards are set for the fish bought. We also argue that government investment in more sustainable fishing would be a win-win, allowing our marine ecosystems to thrive and support a vibrant industry, but also to allow UK-landed fish to access better markets here and abroad.

Summary of key recommendations:

- The Government's proposed annual statement for fish stocks should include information about all relevant aspects of sustainability, to allow a proper data gap analysis
- Public procurement standards for fish should be extended to schools, monitored, and properly enforced
- Government should invest in fishery improvements and sustainability certification

Introduction - What is Sustainable Fish Cities?

2. **About Sustain:** Written evidence submitted by Sustain: the alliance for better food and farming. Sustain advocates food and agriculture policies and practices that enhance the health and welfare of people and animals, improve the working and living environment, enrich society and culture and promote equity. We represent around 100 national public interest organisations working at international, national, regional and local level. Sustain coordinates the Sustainable Fish Cities campaign, as well as a number of other food and farming initiatives, see <https://www.sustainweb.org/projectsandcampaigns/>. We work with our members

and others to promote integrated healthy and sustainable policies and practices for food, farming and fishing.

3. [Sustainable Fish Cities](#) is a national project run by Sustain, working to transform the market for sustainable fish in the UK foodservice sector. Our ambition is that verifiably sustainable fish becomes the norm on menus in the UK.
4. Through our project, fish-serving businesses are invited to commit to an achievable but ambitious pledge to adopt a fully sustainable fish buying policy. The standards that businesses sign up to reflect the recommendations of the Sustainable Fish Cities working party, which is made up of the main marine organisations in the UK (see https://www.sustainweb.org/sustainablefishcity/about/#working_group), and have also been adopted by UK Government for public sector procurement. They ask businesses to:
 - **Avoid fish which is considered 'Fish to Avoid'** by the Marine Conservation Society (MCS) (Red-rated, indicating significant environmental impact or depleted status)
 - **Promote fish which is considered 'Fish to Eat' by the MCS or verifiably sustainable** according to a credible, independent certification scheme including the Marine Stewardship Council (for wild-caught fish), or the Aquaculture Stewardship Council, Organic, GlobalGAP, RSPCA Assured or BAP for farmed fish (for farmed fish).
 - **Improve the sources of fish considered 'OK to eat occasionally'** (amber-rated) by the MCS, and take steps to serve less well-loved and underutilized fish from the UK coast.

Sustainable Fish Cities' response to the questions in this enquiry

The impact of environmental changes and the legal framework protecting ocean biodiversity

What forms of pollution are most prevalent in the ocean, and what impact are they having?

What impact is climate change having on the ocean? What are the effects of ocean acidification now and in the future? How important is meeting the goals set out in the 2015 Paris Agreement on climate change for marine biodiversity?

What more should the Government do to hasten progress towards Aichi targets?

5. The Aichi targets aim to protect global biodiversity. Fishing, and its associated environmental impacts, are the greatest threat to biodiversity in our oceans, and the Government should therefore:
6. **Act to conserve fish stocks**, since they are fundamental to the functioning of ecosystems and therefore species diversity:
 - All fish stocks must be restored and maintained above biomass levels capable of producing the maximum sustainable yield.
 - Fisheries management decisions must be based on best available science.

- Fishing opportunities should be allocated on the basis of transparent and objective environmental, social and economic criteria, in a way that incentivises the most sustainable fishing.
7. **Tackle data deficiency** including stock assessments for all commercial fisheries and increasing data collection. All fisheries must be fully transparent and accountable where all catches, both target and non-target, are fully documented, infringements are properly enforced and fisheries are effectively controlled. Government has already announced an annual statement on the state of UK fish stocks which is very welcome. The statement should show how a fishery is progressing on a range of measures that determine sustainability, for example: stock, fishery impact on biodiversity, management and adherence to laws. This would help to identify data gaps and priorities for addressing them.
 8. **Properly identify and manage Marine Protected Areas**, with full compulsory vessel monitoring so unregulated fishing in these protected areas can be detected
 9. **Become a more responsible consumer to directly incentivise low-impact fishing.**
Government should:
 - Confirm the public sector commitment to buying verifiably sustainable fish
 - Update school food standards to require sustainability criteria
 - Make healthy and sustainable food standards legally binding for hospitals, prisons and the British armed forces
 - Go further in Central Government contracts to demonstrate innovation and even better sustainable fish buying standards

What outcomes and protections should the UK Government be pushing for at the forthcoming UN negotiations on the conservation and sustainable use of marine biological diversity in the world's oceans?

10. Government should be pushing for global improvements in fisheries management, and encouraging other countries to buy only verifiable sustainable fish for their own procurement.

What is the UK's record on meeting existing obligations under international law and the UN Sustainable Development Goal 14 (Life Below the Sea) in respect of biodiversity?

Is the UK's current legal and regulatory framework adequate to protect biodiversity given the growing demands which are likely to be placed on marine resources?

11. Legal standards are urgently needed for public food.

At the moment, apparently legally binding sustainable fish standards are in place for all prisons, hospitals, government departments and defence catering in the UK. However, we have found that they are too often ignored, or it is not possible to find out if they are being met. In a recent study the Sustainable Fish Cities campaign found that only one of the contract caterers serving large Ministry of Defence contracts could confirm that they served verifiably sustainable fish, whilst another¹ study found these caterers serving red-rated fish.

¹ www.sustainweb.org/news/dec17_caterers_league_table/

A [Department of Health report](#), published in 2017 and confirmed by [Sustain research](#) in 2018 found that only half of NHS hospitals were meeting even basic food standards.

12. Sustain's analysis suggests that at the moment about 70% of the fish served by contract caterers in the UK is imported. Clear, universal and predictable standards for fish served would incentivise suppliers and other supply chain companies to produce compliant products, confident that they have a ready market for their goods. In our experience, companies producing food meeting legally binding school food standards have subsequently found new markets for these products elsewhere.

A sustainable blue economy

How effective are the Marine Stewardship Council's ecolabel and fishery certification scheme at ensuring fisheries are sustainable?

13. There has been an extraordinary shift in the purchasing policies of retailers and foodservice companies in the last decade or so, thanks in part to high profile campaigns led by Greenpeace, Hugh's Fish Fight, Sustainable Fish Cities, WWF, and many more.
14. The emergence of credible, third-party ecolabels and certification schemes have greatly helped this transition. Credible ecolabels mean that businesses have a clear route to ensuring that they are buying sustainable fish, and this has, undoubtedly, helped to create strong public commitments.
15. After a great deal of collective effort, in the UK we are beginning to reach consensus about the definition of sustainable fish as a buying standard. Businesses serving over 700 million meals per year have signed up to our sustainable fish standards and they have MSC certified fish at their heart.
16. A step away from the MSC would be a step backwards. We are concerned that without credible ecolabels on packs and on menus it will be almost impossible for the NGO community, or consumers, to differentiate the policies of one business from another. Companies will develop their own, less transparent and unverifiable claims about sustainability. Retailers have history of contested claims about provenance and sustainability – a few examples are at the end of this submission. It would be a big step backwards if the UK market turned to such communication instead.
17. Currently, the UK has one of the largest numbers of Marine Stewardship Council certified fisheries in the world, which is something for the UK to be proud of. The Government should be supporting more fisheries to achieve certification, particularly through financial support. Doing so would benefit fishers' in the domestic and overseas market because an increasing number of retailers and foodservice companies are committed to buying only demonstrably sustainable fish, with MSC seen as the gold standard globally. In fact, [Sustainable Fish Cities has found](#) that a number of large catering companies import certified fish from abroad (even though the same species are available locally – like halibut, scallops, turbot and sea bass), because fish overseas meets better standards for sustainability.
18. Sustainable Fish Cities specifically supports the Marine Stewardship Council certification and ecolabelling scheme because it is consultative and transparent, and public feedback is sought for every fishery certified and when policies are changed.

19. Finally, traceability is incredibly important in the UK foodservice supply chain. A [recent project by Sustainable Fish Cities](#) analysed the sustainable fish buying policies for UK contract caterers, and we found that, for a number of species, it was not possible to gather information about exactly where and how the fish was caught. For some species (including plaice, scallops and nephrops), this is problematic because the source could be red-rated. The MSC overcomes this issue, because it comes with full traceability.

[Does aquaculture cause less harm to marine biodiversity than fishing? Is aquaculture in the UK adequately regulated to protect biodiversity](#)

20. Sustainable Fish Cities uses the assessments of other organisations to determine which fishing methods and activities are sustainable. The third party ratings and certification schemes that make up our pledge take into account the impact of the fishery on the environment, including the impact on biodiversity. It is notable that few aquaculture operations in the UK are considered 'Fish to Eat' or certified sustainable. Most UK salmon is only considered OK to fish occasionally, whilst most king prawns farming is red-rated. This would point to serious environmental issues with fish farming.

[What could the UK do to promote a sustainable marine economy and achieve sustainable marine and coastal ecosystems management in the Overseas Territories?](#)

21. We believe that UK Government has a vital role to play in supporting sustainable fishing in overseas territories by recognising its role as a consumer of fish. In the UK, about 70% of the fish served in catering is imported (including public-sector food), so there is a real opportunity to support sustainable fishing overseas by creating a market for their products, by:
- Confirming the public sector commitment to buying verifiably sustainable fish
 - Updating school food standards to require sustainability criteria
 - Making healthy and sustainable food standards legally binding for hospitals, prisons and the British armed forces
 - Going further in Central Government contracts to demonstrate innovation and even better sustainable fish buying standards

The impact of marine industries, science and innovation, and blue finance

[What is the environmental impact of marine industries, such as deep sea mining, and how effectively does the Government and the International Seabed Authority regulate them to mitigate their environmental impact?](#)

[How is the deep sea mining industry likely to grow in the years ahead? What environmental risks will this bring? What legal protections are in place to mitigate these risks? Are additional legal protections needed?](#)

[How well has Government supported UK marine science and innovation? What more could the Government do to promote a sustainable blue economy?](#)

22. As discussed above, a number of UK fisheries have a credible sustainability certification, but many do not, and we have evidence that these are missing out on vital markets here and abroad. The Government could boost the domestic and export market for UK landed fish by investing in activities that would verifiably improve sustainability; either of individual fisheries or UK stocks as a whole.

23. As a first step, many UK fisheries are data-poor. Here is a snapshot of the key reasons that some UK fisheries are not considered sustainable, and in many cases, data deficiency is the most important reason.

Table: Top fish species for the UK fishing industry, with commentary on conservation status, showing why it is currently hard for UK fishers to access markets that increasingly demand verifiable sustainability – in many cases this could be remedied through better data and management plans

Species	Value to UK fishing industry (£ million) ²	Verifiably sustainable UK sources ³ . Green = Marine Conservation Society ‘fish to eat’ (1 or 2 rated)	UK sources currently considered ‘unsustainable’ (and briefly, why not) Amber = Marine Conservation Society ‘fish of concern’ (4 rated); Red = Marine Conservation Society ‘fish to avoid’ (5 rated)	
Cod	68	North Sea (MSC certified)	Cornwall (stock still too low and catches too high – but improving)	Celtic Sea; Rockhall; West Scotland (stock still too low, some areas don’t have effective management)
Crab	59	All UK	none	
Haddock	45.5	Scottish is MSC certified; Rockall; Irish sea	Celtic Sea; Cornwall (stock is declining or static)	
Hake	41	MSC certified in Cornwall	None	
Halibut	1	None	All areas around UK (data limited)	
Herring	87.4	Nearly all UK stocks are MSC certified	Cornish; West of Scotland and West of Ireland (stock below healthy levels)	
Langoustine (scampi)	106.8	West of Scotland; Celtic Sea	North Sea (data deficient and fishing is damaging)	Farne Deep (data deficient and fishing is damaging)
Lobster	40	Jersey; Cornwall (pot-caught)	Rest of the UK (data poor – no stock assessment)	
Mackerel	288	All stocks – nearly all are MSC certified	None	
Monkfish	73	none	Trawled in Ireland; Channel; Bristol Channel; Cornwall (stock uncertain; stock and catches unknown)	
Plaice	51	Some North Sea areas; Eastern Channel; Cornwall; some MSC certified	Most of Ireland (data deficient – no stock assessment or catch data)	
Scallops	75	Hand-dived scallops only	Wales; Cornwall; Isle of Man	Channel; offshore (lack of data)
Seabass	5	None	Scotland; parts of Ireland (vulnerable to overfishing and stocks very low)	Rest of the UK (vulnerable to overfishing and stocks v. low)
Sole	34	North Sea; Irish; Channel; South Cornwall	Celtic Sea (caught as bycatch but catches too high)	Irish Sea (stock in serious decline); North Coast of Cornwall (no stock data)
Squid	29	none	NE Atlantic, jig caught or trawled (not a protected stock so little management to ensure stocks stay healthy)	
Turbot	9.5	North Sea by trap or hook-and-line	Cornwall (data poor – no assessment of stock)	

² From Defra landings data: www.gov.uk/government/statistics/uk-sea-fisheries-annual-statistics-report-2016

³ Defined as either certified or considered ‘Fish to Eat’ by the Marine Conservation Society. See all the ratings here: www.mcsuk.org/goodfishguide/search

24. Investing in data collection for UK fishing would be a win-win; helping to ensure stocks are well managed, and allowing the fishing industry to prove sustainability. In a very positive and welcome move, Michael Gove promised, in the 25 year Food and Farming Plan, to publish an annual statement on the status of stocks in the UK (page 106), but it wasn't clear whether this included investment in carrying out more data collection. If not, the statement will be full of gaps. We recommend that this be improved.

What national or international measures could the UK pursue to minimise the impact of marine resource extraction, such as sand mining, aggregate dredging and deep-sea mining?

Is private sector finance available to support sustainable blue industries? What could the Government do to promote 'blue finance' and investment in a sustainable marine economy?

25. As per the above, the Government should invest in projects and initiatives that will help fisheries to achieve and demonstrate sustainability, including data collection, gear modification and certification assessment. This should include time-bound and verified Fishery Improvement Projects, that have a clear plan to improve fisheries up to a recognised standard (see, for example Project UK Fishery Improvements <http://www.seafish.org/industry-support/fishing/project-uk/project-uk-fisheries-improvements>)

26. **Below are some recent examples of worrying unverified or misleading claims about provenance or sustainability by UK supermarkets.** We believe that independent, credible ecolabels are currently the best way for NGOs and consumers to verify that fish served and sold in the UK is sustainable, avoiding brand-created standards and claims, which have been previously proved misleading.



The screenshot shows the top of a Guardian article. The navigation bar includes 'Find a job', 'Sign in', and 'Search'. The main header is 'The Guardian' with 'UK edition' to its right. Below the header are category links: 'Inion', 'Sport', 'Culture', 'Lifestyle', and 'More'. A secondary navigation bar lists: 'Travel', 'Health & fitness', 'Women', 'Love & sex', 'Beauty', 'Home & garden', 'Money', and 'Cars'. The article title is 'Supermarkets accused of 'misleading' fish labelling'. Below the title is a sub-headline: 'BusinessGreen: Report finds around a third of sustainability claims on fish products were either 'unverified or misleading''. The main image shows a tuna fish struggling on a hook in the Atlantic ocean. A small caption below the image reads: '▲ A tuna fish struggling on a hook in the Atlantic ocean. Britons want to buy sustainably caught seafood but...'. To the right of the article is a SurveyMonkey advertisement with the text 'CREATE SURVEYS WITH EASE' and 'SIGN UP FREE'.



The screenshot shows a Business News article. The header is 'News > Business > Business News'. The article title is 'Tesco and other supermarkets using fake farm brands spark complaint from NFU'. Below the title is a sub-headline: 'The NFU claimed the fictitious brands misled consumers as it made them believe they were buying products farmed in the UK'. The article is dated 'Data Robinsons | Tuesday 19 July 2016 12:27 BST' and has '0 comments'. There are social media sharing icons for Facebook, Twitter, and Email, with '0 shares' indicated. A 'Like' button is also present. The main image shows a person's hand holding a white plastic shopping bag in front of a Tesco store.

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Sainsbury's Fairtrade fiasco

11 Jul 2017 | Joanna Blythman

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Sainsbury's trial to ditch Fairtrade for its own weak and woolly Fairly Traded equivalent has provoked an outcry and turned into one almighty PR fiasco. All the major charities - Cafod, Oxfam, Christian Aid et al - have hauled Sainsbury's over the coals. At least three internet petitions are calling for Sainsbury's to stick to true Fairtrade. As I write, the largest has over 88,000 signatures.

A parliamentary motion calling on supermarkets to back the internationally trusted Fairtrade mark already has cross-party support from 40 MPs.

My Twitter feed shows a steady drip of damaging comments, such as: 'Another weekend passed without our weekly trip to Sainsbury's. Will continue to boycott 'til commitment reinstated #Fairtrade'



"First you ditch Fairtrade for a weaker, vaguer lookalike; next you ditch that"

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What does 'low calorie' ACTUALLY mean? Study slams supermarkets for misleading customers - and here's what they're hiding

- 'Low-calorie' claims are not indicative of a product's nutritional quality
- Experts say this confuses consumers because there's no definition for 'low'
- And while touted as healthy, these products are often just the opposite
- We break down 'low' nutrient health claims and tell you what's really in your food

By MARY KEKATOS FOR DAILYMAIL.COM
PUBLISHED: 21:04, 15 March 2017 | UPDATED: 21:04, 15 March 2017

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We are constantly being inundated with products claiming health benefits. Supermarket shelves are lined with foods and beverages labeled 'low calorie', 'low sugar', 'low fat' and 'low sodium'. A new study has revealed that not only are such claims not indicative of a product's actual nutritional quality, but they may even give consumers a false sense of confidence about the healthfulness of their food.

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Supermarket claims about fish are misleading, Which? says

Supermarket claims about the sustainability of fish are "misleading and meaningless", consumer group Which? has warned, as "dolphin friendly" tuna rarely swim in the same waters as dolphins.



Supermarkets have been criticised for using meaningless labels on the fish they sell Photo: NATIONAL NEWS & PICTURES



By James Hall, Consumer Affairs Editor

8:00AM BST 19 Jul 2012

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