Tuna 2020 Traceability Declaration Progress Report
Executive Summary

Background

At the United Nations Ocean Conference in 2017, 66 companies including retailers and other businesses involved in the global tuna supply chain signed the World Economic Forum's Tuna 2020 Traceability Declaration (TTD). Their aim was to stop illegal tuna getting to market and as well as promote improvements in environmental sustainability and human rights in tuna fisheries.

The Global Tuna Alliance (GTA), an inclusive constituency of companies interested in improving the sustainability of the tuna sector works with Friends of Ocean Action and is committed to supporting the objectives laid out in the Tuna 2020 Traceability Declaration.

Survey and summary of responses

An online survey was developed by the Global Tuna Alliance and circulated to TTD signatories to find out how they have been addressing the declaration's four commitments: traceability, socially responsible supply chains, environmentally sustainable sourcing, and government partnership.

The results have been used to generate a progress report which highlights examples of best practice, where commitments have been met, and the methods or systems used to develop plans for improvement.

The report also provides an analysis of where signatories have not yet been able to meet the commitments. This will enable the GTA to develop a support and outreach strategy to help address these gaps.

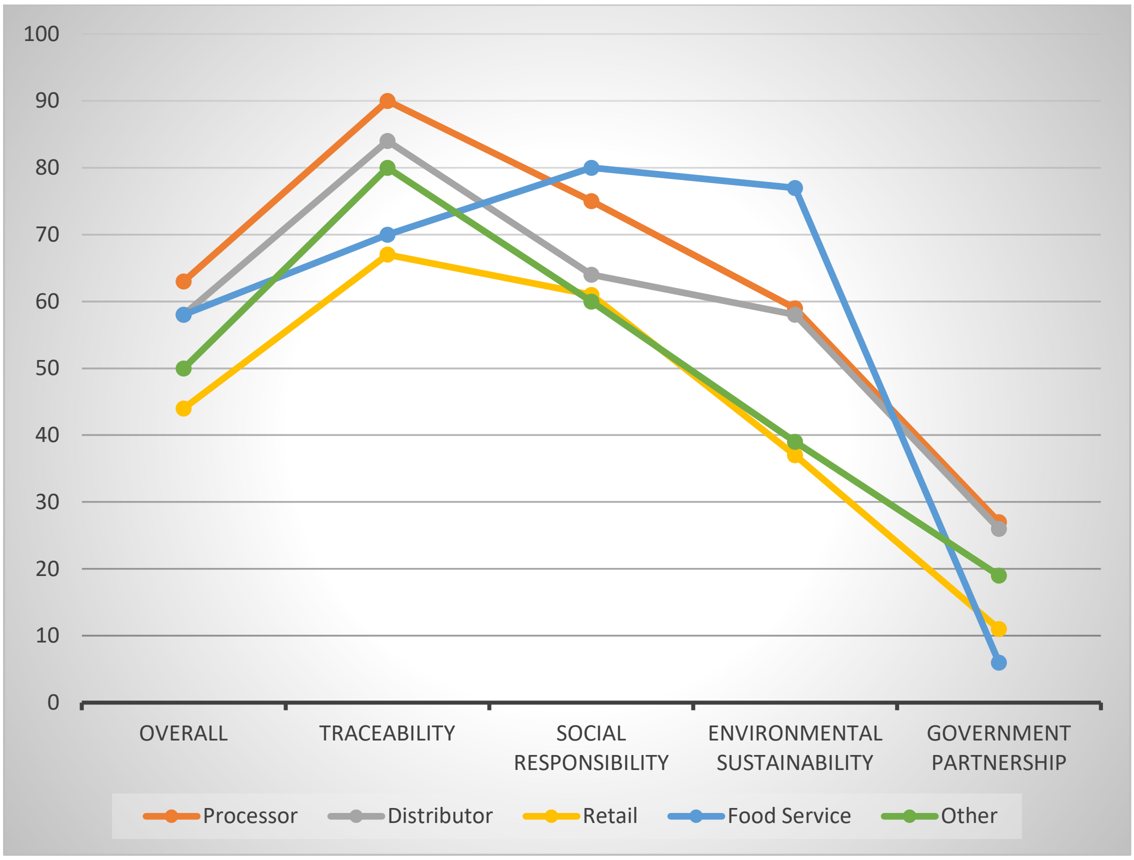
The majority of supply chain respondees were from Europe with the remainder distributed across the USA, South-East Asia/Australia and South Africa. European respondees were primarily from the UK and Spain. Processing was the most common sector represented by respondees followed by distribution.

Key findings include:

- Significant progress has been made by TTD signatories on meeting the traceability commitment but progress on the government partnership commitment scored the lowest by each supply chain sector (Figure 1).
- Interoperability remains a challenge for companies addressing traceability.
- Several companies have systems in place for meeting the social responsibility commitment 'on land' but there was a clear gap in 'at-sea' verification which aligns with support identified regarding the need for third-party auditable standards on vessels.
- Twenty-three companies have made a pledge to source tuna from fisheries that meet the TTD environmental sustainability commitment.
- Advocacy for the development of harvest strategies and harvest control rules is the only area in which companies have engaged in any significant way so far under the government partnership commitment.
- Obstacles hindering signatories in meeting or acting on the commitments are generally external stakeholder resistance and complexity.
- The overarching support areas required by respondees were education and outreach, which addresses the 'complexity' obstacle, and for industry-led multistakeholder initiatives to address specific issues beyond the remit or reach of individual companies.

- The survey reveals that there are clear actions needed to support signatories in meeting or progressing towards the Tuna 2020 Traceability Declaration commitments.

Figure 1. Average performance scores



Further detail on progress, barriers and support needed against each of the declaration's commitments is outlined in brief below.

1. Tuna traceability commitment

We (the signatories) pledge that all tuna products in our supply chains will be fully traceable to the vessel and trip[1] dates, and that this information will be disclosed upon request at the point of sale either on the packaging or via an online system.

Summary of progress

Significant progress has been made by signatories on meeting the traceability commitment. All fishery, distributor and food service companies reported that tuna products in their supply chains are traceable to vessels and trip dates. The remaining responses from across the supply chain reported that tuna products in company supply chains are traceable to fisheries but not to vessel or trip dates. No company stated that tuna products in its supply chain are not yet traceable although two retailers noted that they are in the process of making tuna products in their supply chain traceable.

When asked if the traceable information is disclosed to the consumer at point of sale the responses were positive with the majority of answers being 'yes' or 'working on it'. The further away from point of harvest i.e. retailers and food service companies, the lower the proportion of product that

[1] Recognising the need for aggregated vessel and trip information from small-scale tuna fisheries.

meets the commitment. This may be due to the wider range of products that retailers and food service companies sell compared to producers and suppliers. In addition, the supply chain is much longer by this point, there are more nodes that need to be traced, and the situation becomes more complex.

Barriers and support needed

The traceability commitment was found to have little or no obstacles reported by respondees which may reflect the length of time companies have been working on seafood traceability systems that are required under general food laws. When the responses to this question are analysed by sector it is noticeable that the earlier steps in the chain reported little or no obstacles more frequently. This is possibly due to the shorter distance from the vessel and/or that several of the respondees are participating companies in the International Seafood Sustainability Foundation (ISSF) which has a specific traceability conservation measure. The later segments of the chain found lack of personnel to be a more frequent obstacle, possibly reflecting the diversity of products they source and sell.

When asked what support is required to meet the traceability commitment, responses were few which aligns with the generally high performance of respondees meeting this commitment and the initiatives underway in this area. However, four separate companies requested standardisation of data, also known as interoperability. Interoperability concerns the seamless, secure, and controlled exchange of data between companies (and their applications). To achieve this, and to help ensure that tuna is sourced from demonstrably legal fishing activities, globally agreed standards are needed which will make traceability more uniform and universal, and in turn, more affordable and reliable. These uniform indicators are known as Key Data Elements (KDEs). In addition, the industry needs to adopt interoperable data communication standards and practices, otherwise proprietary traceability systems may be unable to communicate with each other even if standardised KDEs are used.

As noted above, the later steps in the chain found a lack of personnel to be an obstacle. The development of interoperable traceability methods and standardised KDEs should make downstream traceability easier as companies can then more easily consolidate and use upstream data.

The survey responses suggest that meeting the traceability commitment is feasible within the 2020 deadline and that Global Tuna Alliance support should focus on reinforcing the importance of the Global Dialogue on Seafood Traceability (GDST) which can provide the standardised KDEs and frameworks for interoperable IT systems.

2. Commitment to a socially responsible tuna supply chain

We (the signatories) pledge to eliminate any form of slavery and ensure suppliers at least meet minimum social standards in management practices as recommended in the Universal Declaration of Human Rights and the International Labour Organization's Conventions and Recommendations.

Summary of progress

Nearly two-thirds of companies believe their tuna supply chains are 'slave free[2]', and nearly one in five have third-party certification to demonstrate this. Further from harvest the distribution of responses changes; there is a decrease in the number of responses reporting 'slave-free' tuna supply chains and increasing uncertainty. This pattern is also reflected in the proportion of suppliers of tuna products that at least meet minimum social standards which has a cascade effect up the supply chain.

[2] It is acknowledged that social responsibility extends beyond 'slave free' – we are using the language in the original social responsibility commitment "We pledge to eliminate any form of slavery…"

Some respondents added further narrative that describes their activities and achievements in meeting the social responsibility commitment. Several companies noted they have systems in place for processing plants and other on-land activity but the gap in 'at-sea' verification was often cited. This aligns with the support identified by respondents – the need for a third-party auditable standard on vessels.

Signatories were asked what additional activities they have planned in 2020 to achieve the social responsibility commitment. There are some clear areas of commonality and the planned activities can be categorised as either use of third-party standards, capacity building with suppliers or strategy development.

The reliance on third-party standards is unsurprising as they often emerge as the first meaningful initiatives in areas where legislation is weak but action is demanded. The frequency of companies noting upcoming capacity-building activity with suppliers again highlights the importance respondents place on improving social responsibility and education. Several companies have developed or are developing in-house processes to audit suppliers. Finally, several companies are developing strategies for addressing social responsibility in 2020. This should not be taken to imply that all these companies have no processes in place already; in most cases companies are building on existing systems as they learn more and as tools such as third-party standards become available.

Barriers and support needed

Complexity was the primary challenge respondees noted in meeting the social responsibility commitment. This complexity is likely to stem from the breadth of the issue which includes coercive treatment of both sea and land-based workers, abusive labour and recruitment practices variously referred to as slavery or slavery-like practices, forced and bonded labour, human trafficking, and serious forms of child labour. This issue affects many countries and a wide range of products. When the responses to this question are analysed by supply chain sector we find that complexity was the only obstacle reported by all steps of the chain.

When asked what support is required to achieve the social responsibility commitment, responses again converged around a number of related themes including the need for a third-party auditable standard on vessels. The 'at-sea' portion of the supply chain has often been a risk area for human rights abuses with vessels operating away from enforcement activities and ports for several weeks at a time. The sometimes complex and opaque nature of tuna supply chains amplifies the challenge.

The requirement for third-party standards is being addressed with the internationalisation of the Responsible Fishing Vessel Scheme and the development of the Seafood Task Force tuna vessel standard. In addition, OPAGAC (an association of frozen tuna producers in Spain) has developed a Tuna for Responsible Fisheries (APR) standard with the Spanish certification organisation, AENOR.

The Food and Agriculture Organization (FAO) is currently working on guidance to facilitate compliance towards social responsibility in fisheries and aquaculture along supply chains. The FAO Draft Guidance on Social Responsibility in Fisheries and Aquaculture Value Chains is based on international human rights anchored on the International Bill of Human Rights of the Universal Declaration of Human Rights, and instruments and standards of the International Labour Organization (ILO).

Collaboration and capacity-building requests were also frequently raised by respondees and can be summarised as wanting a shared understanding of the required standards and potential solutions.

The survey responses suggest that significant progress can be made towards meeting the commitment if signatories actively use the third-party standards becoming available throughout 2020 and beyond that meet emerging benchmarks to ensure the quality and appropriateness of such standards.

3. Commitment to environmentally responsible tuna sources

We (the signatories) pledge to source from tuna fisheries that have implemented: a) Robust science-based management plans, including harvest strategies that can maintain stocks at, or restore them at least to, levels which can produce maximum sustainable yield; and b) Measures to ensure that impacts of fisheries on the environment are sustainable, including bycatch mitigation techniques.

To put this pledge into effect we will continue to explore new opportunities to support the multi-stakeholder initiatives mentioned above, and we will work to continually increase our sourcing from tuna fisheries certified by schemes that are internationally recognised by the Global Sustainable Seafood Initiative (GSSI).

Summary of progress

Twenty-three companies have made a pledge to source from tuna fisheries that meet the environmental sustainability commitment. Three companies currently source 100% of their tuna from fisheries certified by schemes that are benchmarked by GSSI[3]: one fishery, one processor and one distributor. Twenty companies source less than 10% of their tuna from certified fisheries, but it must be noted that as only 24.5% of global tuna production is currently certified, availability is a limiting factor.

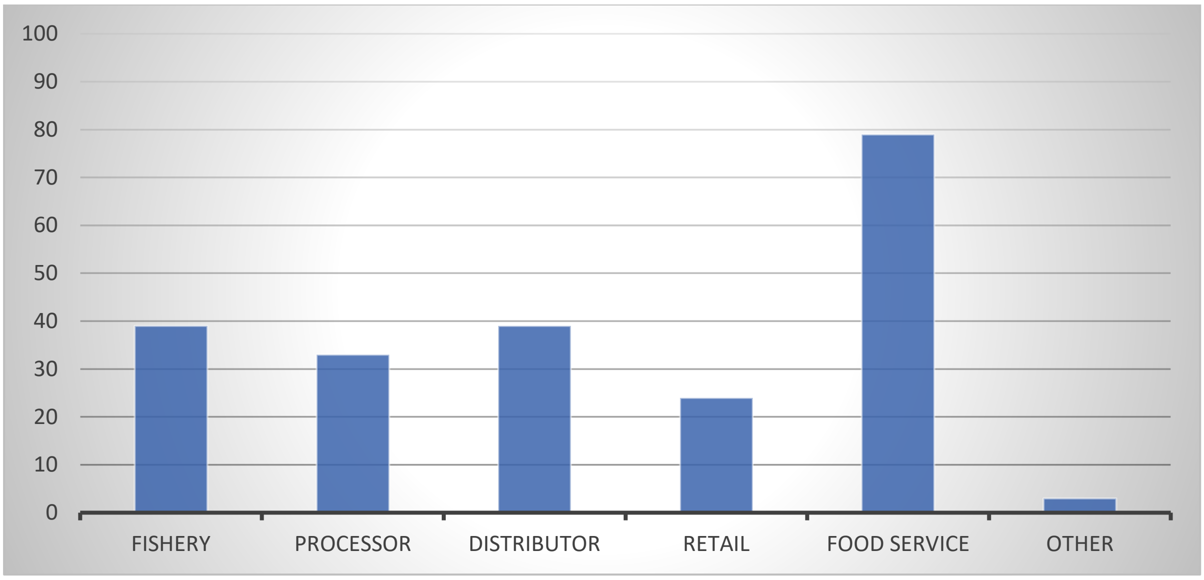
The average percentage of tuna sourced or sold that is certified by schemes recognised by the GSSI is relatively consistent between fisheries, processors and distributors (Figure 2). There is a slight drop with retailers and a large increase for food services. The range of products sold may be a factor here. The food service company respondees may sell a high proportion of skipjack which is proportionately more MSC-certified than other tuna species.

The seafood sourcing policies of four companies are shared in the report. The policies vary yet have several recurring issues such as sourcing from fisheries with GSSI-recognised certifications including Marine Stewardship Council (MSC) and from recognised Fisheries Improvement Plans (FIPs), adherence to ISSF conservation measures, and a ban on shark finning.

Signatories were asked what additional activities they have planned in 2020 to achieve the environmental sustainability commitment. Sixteen companies, nearly half of the respondees, will be seeking or increasing their sourcing from MSC-certified fisheries or from FIPs. It appears that the appetite for certified tuna is not decreasing. A requirement for GSSI-recognised certifications such as MSC is a simple way for companies to meet the Tuna 2020 Traceability Declaration's environmental sustainability commitment, subject to sufficient availability of certified product. Three companies referenced further engagement with Regional Fisheries Management Organisations (RFMOs), which aligns with the government partnership commitment detailed below.

[3] GSSI operates a Global Benchmark Tool to provide confidence in certified seafood and promote improvement in certification schemes.

Figure 2. Average percentage of tuna sourced/sold certified by schemes that are internationally recognised by the Global Sustainable Seafood Initiative (GSSI)



Barriers and support needed

There was a clear divergence between the fishers, processors and distributors versus the retail and food service sectors in the challenges and obstacles involved in meeting the environmental sustainability commitment. The former reported external stakeholder resistance as the primary issue while the latter generally experienced few or no obstacles. The closer a sector is to the product, the less flexibility there is, with fishers being the most reliant on external factors. For example, a tuna fishing company can be fishing responsibly but if its fishery is not managed properly by an RFMO, the company is restricted in its claims of sustainability. The more positive retail and food service responses may be explained by the significant NGO resources that have been invested in environmental sustainability of seafood education and tools, targeted at these sectors.

When asked what support is required to achieve the environmental sustainability commitment, responses again converged around a number of related themes including support for FIPs and action by RFMOs. This suggests that meeting the environmental sustainability commitment by fishers, processors and distributors is hindered by a lack of support for FIPs by their customer base and/or inaction by the RFMOs – aligning with the 'external stakeholder resistance' obstacles.

Several initiatives exist in which RFMO engagement is a priority. The Global NGO Tuna Forum, established in 2017 to bring together NGOs and other individuals and organisations that work comprehensively on tuna sustainability issues, works with supply chain partners on RFMO advocacy. The Global Tuna Alliance, which carried out this survey and actively supports the TTD, is committed to achieving harvest strategies for tuna fisheries through the RFMOs. The International Seafood Sustainability Foundation (ISSF) is committed to supporting fully functioning RFMOs that follow the scientific directive to protect and conserve tuna stocks and ocean health.

Support will focus on helping signatories develop public procurement policies that commit to source tuna from fisheries with third-party certification against a GSSI-recognised standard. Where fisheries have not yet met a GSSI-recognised standard, support will be given for a credible and comprehensive Fishery Improvement Project. RFMO advocacy support is covered through the government partnership commitment below.

The survey responses suggest that the environmental sustainability commitment can be achieved if signatories commit to sourcing tuna from fisheries with third-party certification against a GSSI-recognised standard. Where fisheries have not yet met a GSSI-recognised standard, support should be given for a credible and comprehensive Fishery Improvement Project.

4. Government partnership

In addition to the above commitments, we (the signatories) – as industry leaders – will call on and work with governments to take actions needed to support them:

a) Implement Harvest Strategies for all tuna stocks under the jurisdiction of each tuna RFMO by 2020, that will ensure sustainably managed tuna fisheries in line with SDG Target 14.4.

b) Establish systems to identify and restrict illegal seafood through government-led measures on traceability and transparency.

c) Build capacity to establish and manage information systems to account for domestic and international fishing fleets, landings, enforcement and trade of seafood products, in line with the FAO Code of Conduct and the Port State Measure Agreement.

Summary of progress

Performance on government partnership scored the lowest by each supply chain sector. Advocacy for developing harvest strategies and harvest control rules is the only area where companies have engaged in any significant way, so far. The advocacy efforts reported by respondees are often facilitated by representative organisations such as the GTA and ISSF.

Activities planned in 2020 to achieve the government partnership commitment tend to be built around these multistakeholder initiatives which reflects the support requested by signatories.

Barriers and support needed

Across the supply chain, respondents cited a lack of personnel as the key obstacle in meeting the government partnership commitment. ‘Other’ also scored highly and when explored further, this revealed a lack of leverage a single company has to engage with governments. Many companies have government relations staff or are members of organisations who work on government interaction that could be avenues for representation with decision-makers such as Europeche, Food Marketing Institute (FMI) or European Fish Processors Association (AIPCE). The issues covered in the government partnership commitment are relatively new areas of advocacy and the lack of personnel may reflecting a ‘lag’ or capacity limits for an increasingly complex set of requirements.

When asked what support is required to achieve the government partnership commitment, responses converged around two related themes: industry collaboration and capacity building. Industry collaboration focusses on the understanding that individual companies will struggle to secure policy changes operating independently and need to collaborate to leverage their power and impact. The Global Tuna Alliance, which is committed to supporting TTD signatories, was referred to by several respondees as an example of how companies can address this challenge.

Capacity building, the second theme, related to both educating signatory companies themselves on the issues and how to engage with governemnts, as well as educating decision-makers and other stakeholders on why the requirements are being made. This is intrisically linked to industry collaboration and forms a key pillar of any engagement strategy.

The survey responses suggest that progress can be made towards meeting the partnership commitment if signatories actively particpate in advocacy efforts coordinated by representative organisations such as the GTA and ISSF. Future activities by companies should be built around these multistakeholder initiatives which aligns with the support requested by signatories.

Call to action
The survey has revealed that clear actions are needed to support signatories in meeting or progressing the aims of the Tuna 2020 Traceability Declaration commitments.

- To support signatories in carrying out these actions, an education strategy of toolkits and webinars has been developed by the Global Tuna Alliance. These toolkits explain the purpose of each commitment and how progress in meeting it can be demonstrated. Where available, examples from companies that have met the commitment are presented. In parallel, a series of educational and interactive webinars on the initiatives, tools and platforms the toolkits refer to is under way and available to signatories.

- A progress dashboard has been created for each signatory. It is recommended that companies use the results of their dashboard to identify priority commitment areas to address and measure progress. They can refer to the relevant toolkit for initial support and guidance.

- A follow-up survey will be carried out in late 2020 to determine how signatories have continued to progress in meeting TTD commitments. All signatories will be urged to complete the survey results and all results published will be fully transparent.