

# Codes of Conduct

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## Hong Kong Sustainable Seafood Coalition (“HKSSC”) Voluntary Codes of Conduct

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# Voluntary Code of Conduct on Responsible Fish and Seafood Sourcing

## 1. Vision and Objective

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The Hong Kong Sustainable Seafood Coalition (“HKSSC”) is an industry-led coalition that aims to advance the sustainable seafood market in Hong Kong, by promoting responsible purchasing and consumption of fish and seafood. Our vision is for all seafood imported into Hong Kong to be legal, traceable and biologically sustainable. This Voluntary Code of Conduct on Responsible Fish and Seafood Sourcing (the “Sourcing Code”) outlines general good practice in fish and seafood sourcing which can be referred to by HKSSC members (“Members”) as a reference for their own policies for fish and seafood procurement.

This Sourcing Code applies equally to all Members irrespective of size or sector. It is accompanied by the HKSSC guidance document which helps Members to implement the Sourcing Code.

## 2. Scope

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This Sourcing Code covers the sourcing of all fish and seafood (including invertebrates, shellfish and fish, hereafter “fish”) and it is not a certification standard. It focuses on legality, traceability, biological sustainability and environmental concerns relating directly to fisheries and aquaculture. Food safety and fish welfare are included under aquaculture. For wild sourcing, these issues are included for life reef food fish but general guidance on food safety and fish welfare have been included in the Guidance document (see 2.3.6. Live reef food fish procurement and Appendix 3). Other wider considerations, such as social compliance issues, are beyond the scope of the Sourcing Code.

This Sourcing Code relates to sourcing processes and behaviours regarding Members’ buying practices for fish (own-brand or private label). It underpins the HKSSC Voluntary Code of Conduct on Responsibility Claims.

For the avoidance of doubt, this Sourcing Code sets out recommendations for sourcing processes. Members are free to implement such standards and recommendations as they deem appropriate.

### 3. Members' Commitments

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Members should commit to the responsible sourcing of all own-brand or private label fish and where appropriate, they should follow good practice outlined in this Sourcing Code. This includes use of risk assessments to make purchasing decisions based on the outcome.

Members should commit to having:

- Traceability: Sufficient measures in place to trace fish to their origin;
- Transparency: Ongoing openness and sufficient communication;
- Risk assessments or audits: Regularly conducted and reviewed;
- Sourcing decisions: Based on the outcome of the risk assessments or audits; and
- Appropriate responses: Engaging with and/or monitoring improvements where required.

### 4. Sourcing Policies

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Members should have a sourcing policy that describes how responsible sourcing decisions are made in line with this Sourcing Code. Members will review their policies on a regular basis.

Policies will include the following elements:

**4.1 Traceability:** Members should have sufficient measures in place to trace fish from the point of sale back to its fishery or aquaculture source through all subsequent stages of handling, processing and distribution. In the case of aquacultured fish consideration should also be given to the sourcing of fish feed when this is of wild fishery origin.

**4.2 Transparency:** Members should, where appropriate, communicate their general sourcing policies and credentials to the public and ensure openness regarding sourcing decisions, assessment outcomes and appropriate responses.

**4.3 Risk Assessments and Audits:** Members should assess the legality of fishing operations and supply chains as well as the biological stock status of the fishery or aquaculture source by conducting risk assessments or audits on an annual basis.

**For wild capture fisheries,** Members can use either risk assessments created by another body or those developed internally. Endorsement by an independent competent party is best practice. Risk assessments should include a review of:

- Legality of fishing operations and supply chains;
- Traceability;
- The biological status of a particular fish stock;

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- Fishery management practices and compliance;
- Wider environmental impacts of the fishing activity including those that might be associated with habitat damage; and
- Food safety considerations in relation to live reef food fish and ciguatoxin

**For farmed fish (aquaculture)**, Members should ensure that the source is certified to an environmental third-party responsibility standard with chain of custody or has been audited to a recognised good aquaculture standard or code of practice.

This should include an assessment of:

- Regulatory controls and compliance;
- Traceability;
- Farm site management practices;
- Wider environmental impacts of farming activity;
- Marine feed ingredient sources; and
- Food safety issues such as those that relate to the use of chemicals in culture or shipping of cultured animals

#### 4.4 Sourcing decision and appropriate responses, as outlined in the decision trees:

##### **For wild capture fisheries (Figures 1 and 2)**

Members should ensure that wild sources are either certified to an environmental third-party sustainability standard with chain of custody, or they will use the risk assessments (see Guidance document for details) to identify the potential risks to supply chains and fisheries in accordance with the supply chain and fishery source risk levels outlined below. Members should prioritise their engagement in the improvement of the supply chains and fisheries in light of their respective level of available resources.

##### 4.4.1 Members should identify a supply chain risk outcome as follows:

###### **Low risk:**

The source fishery is certified to an environmental third-party sustainability standard and the Member has confirmed the transparency, traceability and product integrity criteria have been met; or the source fishery and supply chain is traceable with minimal illegal, unregulated or unreported (IUU) fish risk; checks and measures are in place to ensure the integrity of the product being supplied (first, second or third-party assessment).

Member can source with no further action.

###### **Medium risk:**

There is some indication of IUU fish risk in source fishery, but effective/ demonstrable checks and measures are in place to ensure the integrity of the product being supplied.

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Member can source with appropriate engagement and/ or monitoring.

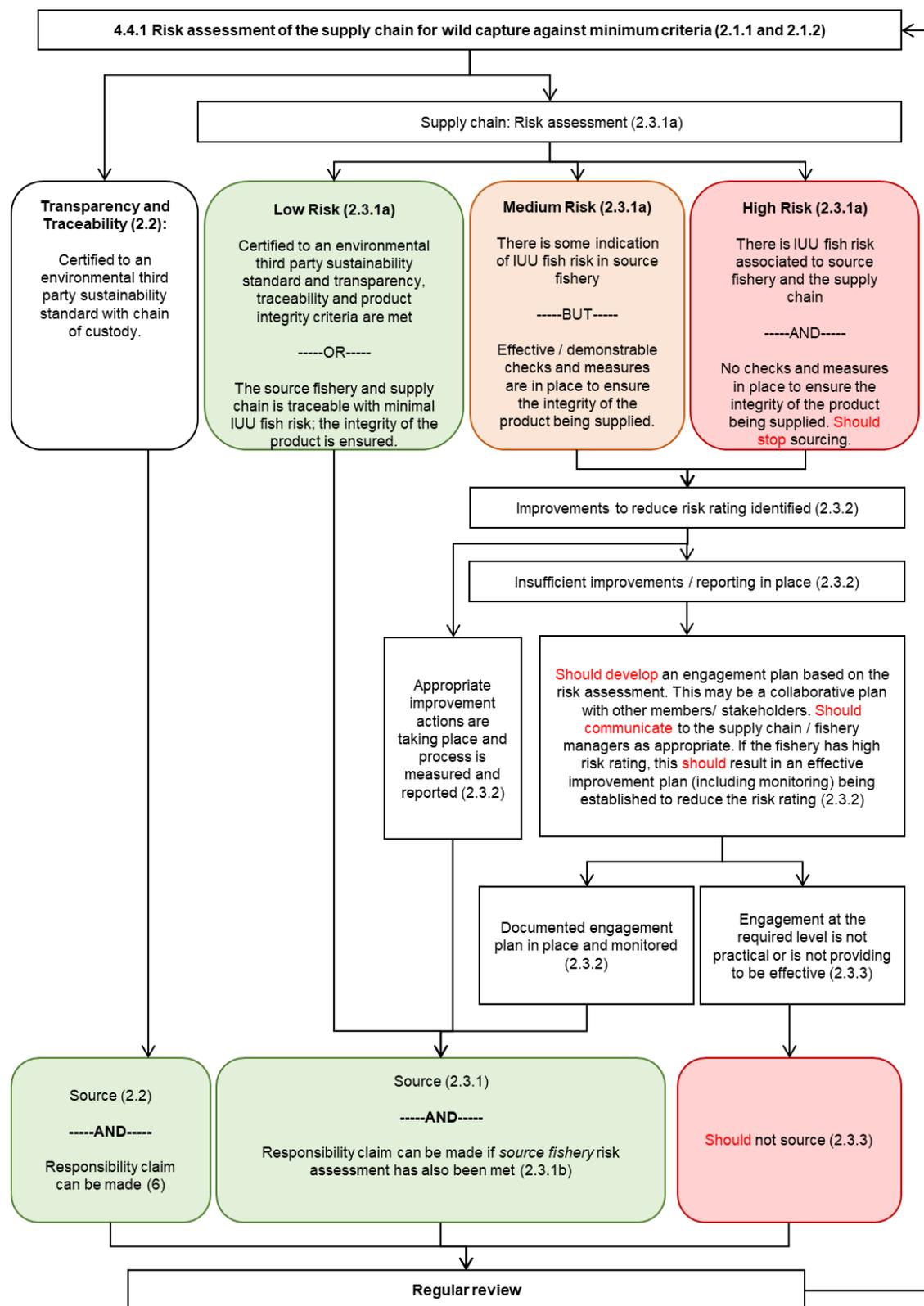
**High risk:**

There is IUU fish risk associated to source fishery and the supply chain and no checks and measures are in place to ensure the integrity of the product being supplied.

Member should only source with appropriate engagement and monitoring of progress and when the source fishery and supply chain has achieved a medium risk level.



Figure 1 Decision tree for sourcing wild capture fish based on the supply chain risk assessment. The numbers in parentheses point to the relevant section of the guidance document



#### 4.4.2 Members should identify a fishery source risk outcome as follows:

##### **Low risk:**

The source fishery is certified to an environmental third-party sustainability standard; or the fishery has a stable and productive stock status (maximum sustainable yield), adequate management with proven effectiveness, ongoing stock status information/ monitoring and low environmental impact. If the stock is data poor then measures are in place to improve data collection.

The Member can source with no further action.

##### **Medium risk:**

The source fishery has a stable status (neither optimal nor poor); and requires improvements to mitigate its environmental impact and/ or to manage and/or to monitor the stock. It may be data poor but has stable catches with adequate and effective management.

Member can consider sourcing with appropriate engagement and/ or monitoring.

##### **High risk:**

The fishery has one or more of the following:

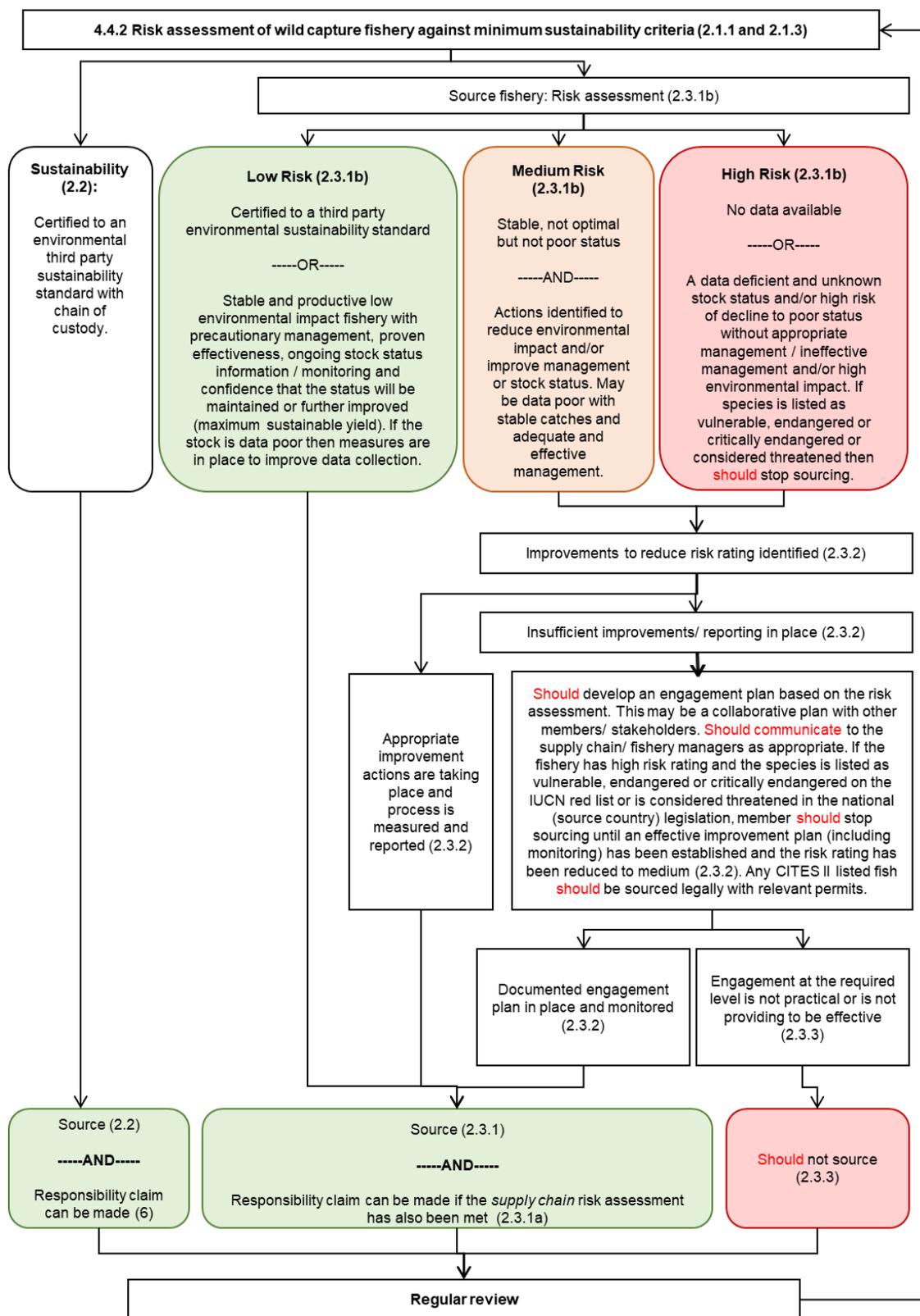
- Proven poor stock status;
- High risk of decline to poor stock status without appropriate management/ ineffective management;
- Unacceptable environmental impact; or
- Complete data deficiency (i.e. no monitoring or current information on stock status/ environmental impacts/ management).

The Member should only source with appropriate engagement and monitoring of progress.

If a species is listed as vulnerable, endangered or critically endangered on the IUCN red list or is considered threatened in the national (source country) legislation then the Member should stop sourcing until an effective improvement plan (including monitoring) has been established and the risk rating has been reduced to medium. Any CITES II listed fish should be sourced legally with relevant permits.



Figure 2 Decision tree for sourcing wild capture fish based on the source fishery risk assessment. The numbers in parentheses point to the relevant section of the guidance document.

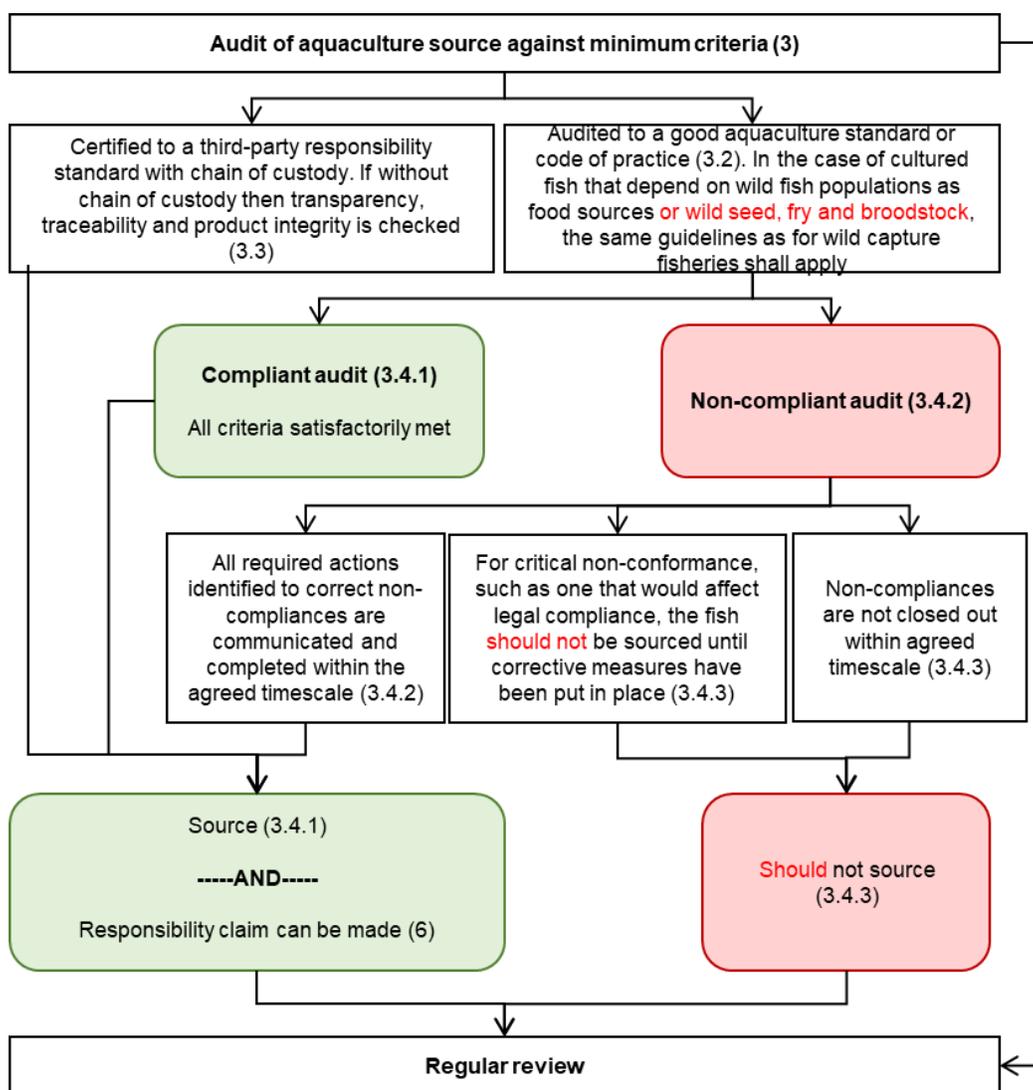




### For aquaculture (Figure 3)

Members should ensure that sources are either certified to a third-party responsibility standard with chain of custody or audited as compliant to a good aquaculture standard or code of practice. All required actions identified to correct non-compliance should be communicated and the timescale for this agreed. In the case of cultured fish that depend on wild fish populations as food sources or wild seed, fry and broodstock, the same guidelines as for wild capture fisheries (above) should apply. If these conditions cannot be ensured, then the Member should not source.

Figure 3 Decision tree for aquaculture sourcing. The numbers in parentheses point to the relevant section of the guidance document.



# Voluntary Code of Conduct on Responsibility Claims

## 1. Vision and Objective

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The Hong Kong Sustainable Seafood Coalition (“HKSSC”) is an industry-led coalition that aims to advance the sustainable seafood market in Hong Kong, by promoting responsible purchasing and consumption of fish and seafood. Our vision is for all seafood imported into Hong Kong to be legal, traceable and biologically sustainable. By agreeing to follow this Voluntary Code of Conduct on Responsibility Claims (the “Labelling Code”), HKSSC members (“Members”) should commit to assuring consumers that all voluntary responsibility claims made in relation to their fish and seafood are consistent, clear and accurate.

## 2. Scope

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This Labelling Code covers all voluntary responsibility claims made by Members in relation to wild sourced fish and farmed fish products (own-brand or private label). Responsibility claims include claims as communicated on product labels, websites, in-store messaging etc., as well as additional factual environmental and traceability information provided.

The Labelling Code sets out the Responsibility claim and the minimum criteria that should be satisfied to make such a claim. The Labelling Code is not a certification standard and Members are free to adhere to the terms and conditions of third-party certification schemes.

For the avoidance of doubt, this Labelling Code sets out recommendations for Responsibility Claims. Members are free to implement such recommendations as they deem appropriate.

## 3. Members' commitments

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Members should commit to only using responsibility claims that are in accordance with these minimum criteria:

- The single term ‘responsible’ should not be used in isolation. For example, ‘responsibly farmed’ could be used;
- Any images should reflect the claims or processes they are intended to depict (for example, the fishing method);
- Sufficient assurance should be made available on request to support any claim;

- Where possible, sufficient explanation of the claim should either be provided at the point of sale, or via a link to where an explanation can be found; and
- Information should be made available to consumers or the general public, on request, or presented on websites or social media, that can support sourcing decisions for different species.

## 4. Responsibility claim

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Members can use a responsibility claim in order to avoid misinterpretation. The term responsibility is preferred over the use of the term sustainability.

At least 95% (by weight) of the component fish in the product or dish should satisfy the criteria for a claim regarding responsibility.

### Responsibility

This relates to the legality and traceability of the source fishery/ farm and supply chain as well as the current environmental, biological and management status of the fish species. Members should only make responsibility claims if they are satisfied the following minimum criteria are met:

- The source fishery or aquaculture source is consistent with the principles of relevant key international standards; and
- An independently audited chain of custody is in place to trace the fish to its (fishery or aquaculture) source; or
- The transparency, traceability and product integrity criteria have been met (in the case of aquaculture, wild capture fish feed sources also need to be considered); or
- Fish is sourced in alignment with the HKSSC Code of Conduct on Responsible Fish and Seafood Sourcing (the “Sourcing Code”).

Members should be able to demonstrate that these criteria have been met by at least one of the following:

1. Certification to a third-party sustainability standard (fishery) or responsibility standard (aquaculture) with chain of custody;
2. Certification to a third-party sustainability/ responsibility standard without chain of custody, but transparency, traceability and product integrity have been met (first, second or third-party audit); or
3. An assessment is conducted using the supply chain and fishery source risk assessment criteria/ a good aquaculture standard or code of practice as outlined in the Sourcing Code.



In addition, supporting information regarding sourcing should be made available on request or posted on company websites or social media for transparency, and updated as needed.

## More information

Further information and examples are available in the guidance document, at [www.hksustainableseafoodcoalition.org](http://www.hksustainableseafoodcoalition.org) or by contacting the HKSSC Secretariat at [info@hkssc.org](mailto:info@hkssc.org).