

Responsible Sourcing Statement

2019/20



Since being established in 1985, Whitby Seafoods has always strived to deliver the best quality, delicious products to our customers. At the heart of this is having an understanding of, and minimising the impact of our operations on our environment, particularly the marine ecosystem.

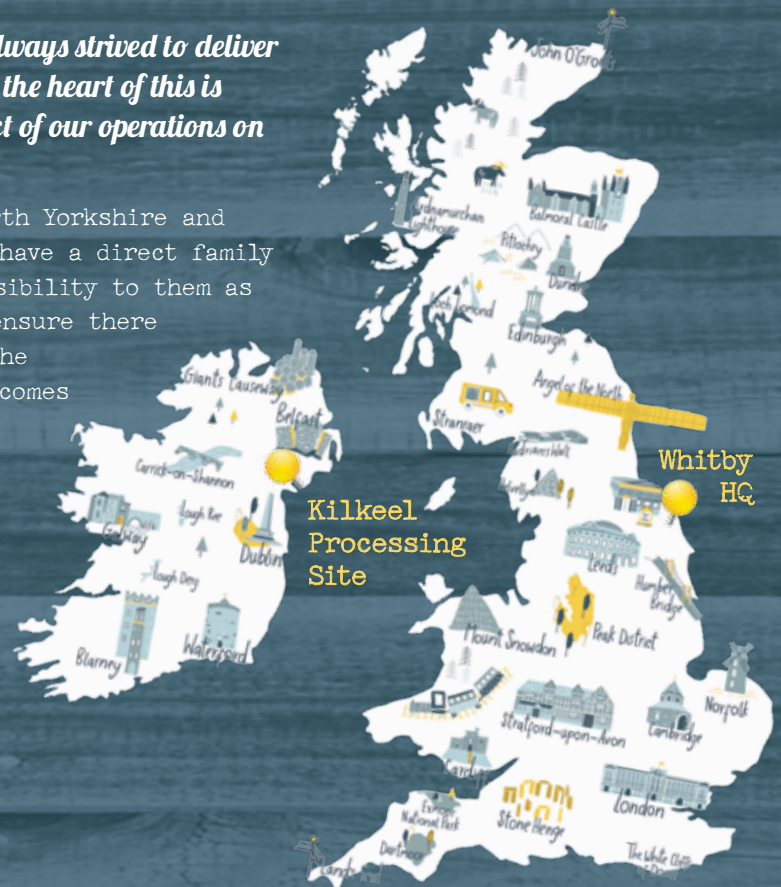
We operate out of two fishing ports, Whitby in North Yorkshire and Kilkeel, Northern Ireland. Many of our employees have a direct family link to the fishing industry and we feel a responsibility to them as well as the communities from which we source to ensure there is a thriving marine environment for years into the future. Currently, over 80% of the fish we source comes from waters around the British Isles.

Our Responsible Sourcing Objective

To care for the seas and oceans from which we source and support the people and communities that rely upon them.

Our sustainability values are particularly focussed on;

- Sourcing responsibly.
- Promoting and supporting ethical behaviours for all people engaged in our supply chain.
- Working legally and safely.
- Operating with minimal environmental impact.



Our Aim

Our overarching aim is for all the fisheries from which we source to be healthy, fished legally by proud fishermen who are well looked after, and for the communities that rely on these to thrive from their success.

Sourcing Responsibly

We want all the fisheries from which we source to be recognised as sustainable. Our responsibility is to celebrate and promote the products that come from certified fisheries and support those fisheries with the ambition to reach this goal.

We understand a successful fishery will have a knock on effect to the communities that relies on it. We recognise that sourcing

responsibly directly results in the increased prosperity of people and the local economy.

For wild caught fisheries, we identify the Marine Stewardship Council (MSC) standard as being evidence of a sustainable fishery. Our first preference is to source from MSC certified fisheries and promote our products that have this standard.

For seafood that comes from farmed sources, we only source fish with Aquaculture Stewardship Council

(ASC), GlobalGAP or Best Aquaculture Practice (BAP) certification.

We have a duty to uphold the human rights of those people engaged in our supply chain. We are working closely with our supply partners and NGO's to support UK boats in demonstrating compliance to ILO convention 188 now it is written into UK law and placing the UK fishing industry as a world leader in this area.



Risk Assessment

We apply risk assessment methodology when the fish we source does not hold 3rd party certification for sustainability. The risk assessment identifies where priorities for further consideration should be taken to allow us to make a full and informed decisions on sourcing.

References are made against Seafish RASS tool as well as the MCS Good Fish Guide. Additional external references are made to support the assessment when necessary in order to make it suitable and sufficient for purpose.

The risk assessment will identify the activities required or already in place that will reduce the risk to an acceptable level.

These actions could;

- Reduce environmental impact
- Improve management of the fishing ground, or
- have a positive impact on stock status.

In addition to this we may put an engagement plan in place with regular monitoring and communication to ensure its effectiveness.

Medium and High risk outcomes will result in the identification of actions to reduce risk.

Our seafood sourcing risk assessment is updated twice annually.

Fishery Improvement Projects (FIP's)

Where our risk assessment indicates that a fishery is a high risk or any actions taking place for improvement are not proving effective then we look to engage the relevant stakeholders in an FIP. We will look to engage stakeholders to commit to a FIP when the following criteria are met:

- We have sufficient commercial interest in the fishery.
- We have influence in the fishery directly or through our suppliers.
- We have sufficient resource to support the FIP.

Should all realistic and practical approaches for improvement be exhausted, we will take the decision to withdraw from a fishery.



Scampi Sourcing

It is our belief that sustainable fishing policies and supporting regulatory measures are vital for the posterity of our industry. As the largest processor of scampi in the UK, we take our responsibility for creating a sustainable future extremely seriously.

The main challenges we see that are impacting sustainable nephrops fishing are:

1) Managing fishing effort by fishing ground.

Currently fisheries management applies to entire sea areas, whereas scientific advice suggests that it should be an individual fishing ground level (a sea may have many individual grounds).

Whitby Seafoods is fully supportive of the North Sea Multi-Annual Plan and Western Waters Multi-Annual Plan which gives regulatory authorities the ability to apply technical measures to manage the impact that fishing vessels have on a particular fishing ground. This particular method of management is being appraised as a potential solution to the scope of

fisheries management and the number of nephrops fishing grounds.

This was first applied in the Farn Deep fishing ground where measures were applied by government and the stock showed recovery to a level consistent with scientific advice levels.

2) Returning unwanted catch to the sea.

Unwanted catch comes in two forms, namely by-catch (a species other than nephrops) and catches of nephrops which are below the minimum size. In the past, both these types of unwanted catch were discarded overboard. From January 1st 2019 the Landing Obligation Regulations (part of common fisheries policy reform) came into force. As part of this reform fisherman are being challenged with further improving selectivity whilst trawling.

Whitby Seafoods is actively involved in this work and working closely with the catching sector, as it is our belief that it is critical to the viability of the fishery in the long run.

*Fishing for Scampi (scientific name **Nephrops norvegicus**, commercial name **Norway Lobster**) takes place in a number of European waters. Whitby Seafoods sources its scampi from fishing grounds around the UK and Ireland..*

3) Impact on the Seabed

Trawling for nephrops inevitably has an impact on the condition of the seabed. Currently it is unknown as to the full extent trawling has to habitats and particularly vulnerable marine ecosystems (VME's).

The introduction and roll out of vessel monitoring, utilisation of habitat surveys and identification of VME's will allow scientists to assess this impact and for appropriate fisheries management to be put in place.

Nephrops FIP's

Project UK Fisheries Improvement Stage 2 (PUKFI)

The nephrops catch is the UK's second most valuable stock and is therefore of vital importance to the UK fishing sector. As the industry leader in scampi procurement we have been campaigning for the implementation of a FIP (Fishery Improvement Project) for all the UK nephrops fisheries in order to preserve and indeed grow this worth to the UK. This ambitious 5 year project uses the MSC standard as the benchmark and looks to address all the challenges the UK nephrops fishing industry faces against this standard.

We are therefore proud supporters and advocates of PUKFI which includes all UK nephrops fisheries. We have taken on the role of FIP co-chair to demonstrate our commitment to ensuring its success and to support all those who rely on this species for years into the future.

Irish Prawn FIP

The other element of nephrops supply comes from Irish fishing grounds. Similar to PUKFI, the Irish Prawn FIP uses the MSC standard as the benchmark and is challenging the gaps





against the standard. We are fully supportive of the FIP directly with both the FIP co-ordinator and with our Irish supply partners.

Sustainability Ratings

We use these ratings as an interpretation of a fishing grounds sustainability credentials at a particular moment in time to assist with our risk assessment process. Due to the scale and rate of fisheries scientific advice being published it is impractical for administrators of websites to keep pace with change. Therefore, Whitby Seafoods will also interpret scientific advice to give our customers the very latest position of fisheries from which we source.

Table 1.1 shows all the possible fishing grounds from which Whitby Seafoods could source in the year. Associated comments per ground are taken from RASS and supplemented by our business in the case for those fishing grounds with challenging ratings. Our scampi purchasing team work with our supply partners to secure the right amount of the best quality scampi from around the UK and Ireland to service our business and are informed by the latest sustainability data to assist them with this. For these reasons some of the fishing grounds listed might not be accessed in the year. Further details can be made available on request.

As already highlighted, we see the North Sea Multi-Annual Plan and Western Waters Multi-Annual Plan as an immediate mechanism to address some of the challenges highlighted in the assessments of these grounds and believe that supporting these fisheries is the best way to improve them, rather than walking away.

Marine Protected Areas

Marine Protected Areas (MPAs) are a clearly defined geographical space, recognised, dedicated and managed, through legal or other effective means, to achieve the long-term conservation of nature with associated ecosystem services and cultural values.

Whitby Seafoods see the protection of MPA's and adherence to the

management methods put in around them as a vital part of our procurement strategy. We are supportive of government enforcement and control of this and expect our supply partners to take the same approach. We commit ourselves to action should there be evidence of working against the governments conservation advice within our supply chain.

Sustainability Partners

We value the viewpoint and expertise that other organisations can bring to the sustainability challenge. We will often look to partner with other organisations who can bring their expertise and experience to a sustainability issue in order to move it forward. We embrace the idea of a multi stakeholder approach where there are common goals and a willingness to improve a fishery.

Whitby Seafoods is a member of the Sustainable Seafood Coalition (SSC). We are working with like-minded businesses towards a sustainable future for fish. We prioritise our engagement in improvement of

the fisheries appropriate to our influence and resource.

Find out more at
<https://www.sustainableseafoodcoalition.org/whitby-seafoods>

As a leader and key influencer on this matter in the UK fishing industry it is important that we have open and ongoing communication with a range of stakeholders to shape the future of the key fisheries from which we source. We currently have open and ongoing relationships with a number of NGO's, academic institutions, customers, suppliers, government bodies and trade bodies.



Table 1.1, accurate as of May 2019

ICES Sub Area	Sea Area	Functional Unit	MCS Rating	Averaged Seafish RASS tool score	RASS comments (with Whitby Seafoods supporting commentary in italics)
Clyde Sea	West of Scotland	13	4	3.25	Developments in discard reduction under the EU common fisheries policy should reduce discarding over the coming years.
South Minch	West of Scotland	12	4	3.25	Abundance is above the reference value for sustainable harvesting (MSYBtrigger) however have fluctuated over past 15 years. Harvest rates have fluctuated around (sometimes significantly above) maximum sustainable yield (FMSY) over past 15 years. Recent trends suggest a decline in biomass and increase in harvest rate.
North Minch	West of Scotland	11	3	3.25	Implementation of Marine Protected Areas under UK Marine Acts is designed to reduce adverse impacts.
Western Irish Sea	Irish Sea	15	3	2.75	Nephrops trawlers target specific habitats containing burrowing mud communities and changes in the biodiversity of these areas have been associated with trawling. There is a process in place under the OSPAR convention and UK Marine Acts to avoid adverse impacts through the designation of Marine Protected Areas.
Eastern Irish Sea	Irish Sea	14	3	2.75	Measures to reduce bycatch and discards of whitefish have been the subject of much research over the years, resulting in technical measures which improve selectivity, which in turn have been implemented as a statutory requirement.
Labadie, Cockburn & Jones	Irish Sea	20-21	3	3.5	Nephrops vessels are required to use selectivity devices but these do not appear to be fully effective and discard rates for some species remain high. The availability and voluntary adoption of additional mitigation measures is improving.
Celtic Sea - the smalls	Irish Sea	22	5	3.5	A network of Marine Protected Areas including Marine Conservation Zones is under development, two within the FU including one in the mud patch. If spatial management in respect of these is implemented, they may include some actions to reduce potential impacts on sensitive habitats.
Porcupine Bank	West of Ireland	16	4	4	Recent trends show a slight decline in the stock abundance indicator. The harvest rate has also increased significantly since 2015.
Irish Coasts	West of Ireland	19	3	3.25	A network of Marine Protected Areas including Marine Conservation Zones is under development, including several in FU19. If spatial management in respect of these is implemented, they may include some actions to reduce potential impacts on sensitive habitats.
Aran Grounds	West of Ireland	17	4	3.5	Abundance is below the reference value for sustainable harvesting (MSYBtrigger) and appears relatively stable. However the harvest rate has increased in 2016 and now above that required for maximum sustainable yield (FMSY).

The Noup	North Sea	10	4	3.25	The population status is unknown, however catch rates are declining and harvest rates are being set at levels well below those required for Maximum Sustainable Yield; FMSY.
Off Horns Reef	North Sea	33	4	3.5	A data limited assessment indicates that harvest rates are lower than those associated with maximum sustainable yield (FMSY). However there is no indication of biomass trends.
Norwegian Deep	North Sea	32	3	3.25	Bycatch of non-target species in this fishery is relatively high with poor selectivity. However, with technical and spatial management measures continuously under development and the incoming EU landings obligation intended to reduce discarding of managed species, the bycatch risk is likely to reduce in the future.
Firth of Forth	North Sea	8	3	3.75	Bycatch of non-target species in this fishery is relatively high with poor selectivity. However, with technical and spatial management measures continuously under development and the incoming EU landings obligation intended to reduce discarding of managed species, the bycatch risk is likely to reduce in the future.
Moray Firth	North Sea	9	3	3.75	Bycatch of non-target species in this fishery is relatively high with poor selectivity. However, with technical and spatial management measures continuously under development and the incoming EU landings obligation intended to reduce discarding of managed species, the bycatch risk is likely to reduce in the future.
Farn Deep	North Sea	6	3	4	The Landings Obligation and improvements being made in gear technology will be expected to reduce the risk of bycatch going forward.
Fladen	North Sea	7	2	3.25	Bycatch of non-target species in this fishery is relatively high with poor selectivity. However, with technical and spatial management measures continuously under development and the incoming EU landings obligation intended to reduce discarding of managed species, the bycatch risk is likely to reduce in the future.
Botney Gut Silver Pits	North Sea	5	4	3.75	Nephrops otter trawls have the potential to interact with vulnerable habitats, but there is some spatial management with in the footprint of this fishery which provides protection to identified vulnerable marine habitats. Management measures are continuously being developed and could reduce the risk further.
Devils Hole	North Sea	34	5	3	Nephrops otter trawls have the potential to interact with vulnerable habitats, but spatial management measures are continuously being developed and will likely reduce the risk.



The Future



As outlined in this statement, we take our role as a sustainability leader very seriously.

We are delighted that a proportion of our supply has a sustainability certification and we embrace the challenge this places on us and our partners to achieve this for the rest of our fish supply.

We believe that the stakeholders within the fisheries from which we source have the desire to influence the sustainability challenges faced and with our support can put actions in place to achieve a certified standard.

Our vision is for all our Seafood to be sustainably sourced and as a result ensure the long term prosperity of the people and communities who rely upon the fisheries from which we source.



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