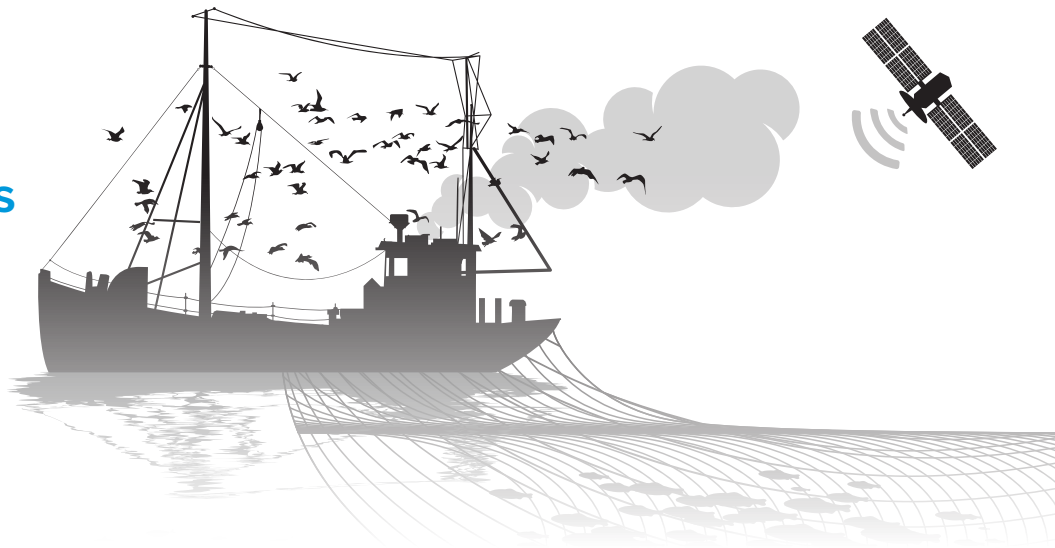


Prioritizing Transparency: Companies' Insights and Needs to Effectively Combat IUU Fishing



The global and interconnected nature of seafood supply chains means that addressing illegal, unreported, and unregulated (IUU) fishing is only possible with active industry engagement. Today, systemic gaps in data transparency are both preventing seafood companies from robustly identifying IUU fishing risks in their own operations and preventing governments from effectively implementing regulations aimed at eliminating IUU fishing.

The two company case studies presented here highlight the important role seafood companies play in addressing IUU fishing while recognizing the clear connection between increased government data transparency and the benefits of risk assessment processes. These companies highlight examples of existing transparency initiatives with the hope of motivating more companies to take action, in collaboration with the public sector, to collectively combat IUU fishing.

Culimer USA and Culinary Collaborations LLC

As a U.S.-based seafood and sushi ingredient importer and distributor, [Culimer USA](#) and [Culinary Collaborations LLC](#) (CCL)¹ prides itself on providing high-quality products to North American markets. Responsible sourcing is a core tenet of CCL, and by publicly sharing its [Sustainability & Tuna Sourcing Commitment](#), the company demonstrates its dedication to transparency and shares its expectations with both the public and its supply chain partners. Working closely with suppliers to map supply chains for wild and farmed products, CCL builds full chain traceability, which supports producers in their efforts to meet U.S. regulatory compliance. CCL has developed a quality assurance process for validating product data, which requires training staff and building capacity to review product data and understand when certain risks may be present (e.g., a fishing vessel at sea longer than 11 months). CCL is motivated to progress its transparency efforts beyond regulatory compliance to build a trusted legacy with its supply chain partners and forge relationships to make sustainability improvements over time.

Comptoirs Océaniques

Comptoirs Océaniques (also known as [Fish Is Life](#)) is a France-based seafood and sushi ingredient supplier. The company is working to build trust and transparency by prioritizing short tuna supply chains and developing long-term relationships with its suppliers. This helps avoid the complicated and opaque supply chains associated with tuna products and mitigates the risk of IUU fishing by encouraging transparency down to the vessel level. Comptoirs Océaniques is driven by an ethical approach to "environmental, social and economic sustainability and full product transparency," which is supported by its [Corporate Social Responsibility](#) policy, [Sustainable Fishing statement](#), [Business Ethics Code](#), and [Responsible Tuna Purchasing Policy](#). Comptoirs Océaniques understands that knowing its supply chains is essential for preventing IUU products from entering the market. Making informed sourcing decisions strengthens relationships with customers and helps build a reputation of legitimacy and authenticity. Through active engagement, Comptoirs Océaniques is building trust between all stakeholders and promoting the long-term resilience and durability of seafood supply chains.

"When you are transparent, it is courageous."

Alain Bailly, President and Founder of Comptoirs Océaniques

Supply Chain Risk Project

The Supply Chain Risk Project ([SCR](#)P) was launched in 2021 as a collaboration among the World Economic Forum's [Friends of Ocean Action](#), [FishWise](#), [Global Fishing Watch](#), and the [Stanford Center for Ocean Solutions](#). SCR aims to enable actionable due diligence by seafood industry members through aggregation and automation of multiple sources of data. It aims to provide important vessel-level information to inform companies' risk assessment processes that can easily integrate into existing workflows.

¹ Culimer USA and Culinary Collaborations LLC are separate companies, but are referred to collectively as CCL in this case study.

Current Transparency Challenges

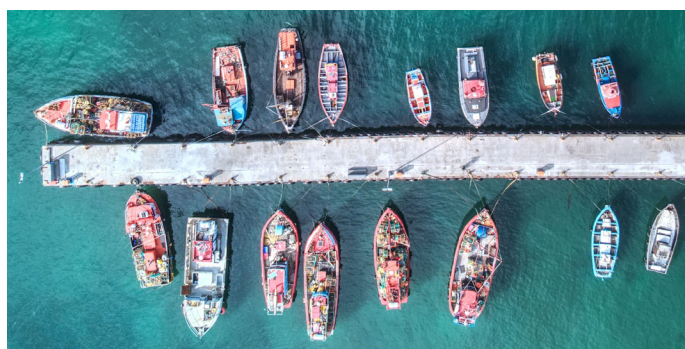
Comptoirs Océaniques and CCL reported a wide array of challenges and obstacles that need to be overcome when embarking on new and improved interventions to enhance transparency and combat IUU fishing. These challenges range in scope from internal company challenges to external supply chain complexities:

Internal Challenges

- **Capacity and operational costs:** Devoting resources to both internal and external transparency is a time-intensive endeavor for companies. They need to allocate sufficient time to train their staff in comprehending and conveying data collection procedures, transparency requirements, and the legal, environmental, and social implications of seafood sourcing. Enhancing transparency entails considerable operational expenses, whereas opting for seafood procurement without scrutiny may seem cost-effective.
- **Transparency gaps:** Seafood supply chain events generally have notoriously minimal oversight and transparency (e.g., at-sea transshipment, transportation, and commingling). Enhancing transparency in these areas would allow for more confident and accurate IUU fishing risk assessments and provide greater traceability.
- **Social information:** At present, robust information on social responsibility risks is challenging to collect from suppliers beyond the presence/absence of a human rights policy. As these policies can vary widely in scope, companies must use their resources and capacity to ensure alignment with best practices (e.g., the presence of effective grievance mechanisms).
- **Timeliness:** Companies expect product information to be shared on time to meet policies and data expectations. Access to timely data is important for mitigating risks and responding to inquiries (e.g., from the government or retailer) as they arise.
- **Verification:** Navigating the multitude of public and private databases poses a challenge in determining which datasets are most suitable for product verification. Moreover, uncertainty persists regarding the specific information necessary for companies to confidently pinpoint social risks, particularly at the vessel level. While suppliers are incorporating social policies into their operations, the necessity to “trust, but verify” remains; the precise requirements for verification remain ambiguous.

“Only by understanding the situation and with proper data can we change and improve things.”

Alain Bailly, President and Founder of Comptoirs Océaniques



External Challenges

- **Data complexity and accessibility:** Numerous but disparate databases serve various functions, yet they can inundate companies, lack completeness, or remain inaccessible to the public. Restricted data availability complicates the process of verifying supply chain information, adding to its time-consuming nature. Streamlining databases and providing guidance on data access and interpretation would alleviate capacity constraints and facilitate efficient risk analysis by enhancing the accessibility and usability of information.
- **Culture:** Seafood is a global commodity, prompting companies to collaborate with suppliers from various seafood-producing nations and diverse cultural backgrounds. It is imperative to honor and acknowledge these cultural differences, investing time to foster trust in order to effectively communicate transparency expectations and requirements.
- **Evolving expectations:** End buyers are making increasing demands of their suppliers, and sometimes these asks feel beyond the scope of a seafood company’s responsibility. Instead, strengthening flag/port state regulations and enhancing transparency could better support these expectations of end buyers.
- **Flag state regulations:** The absence of enforcement and governmental transparency contributes to the persistence of IUU fishing. Advocacy initiatives should focus on enhancing transparency throughout the supply chain across nations, including flag and port states, and promoting the robust codification and enforcement of regulations to tackle IUU fishing. While many advocacy and transparency endeavors concentrate on regional fisheries management organizations (RFMOs), extending these efforts to encompass flag and port states would facilitate enhanced transparency for vessels not under RFMO management, such as small-scale vessels.

“Instead of targeting individuals or companies, shift the focus from blame to addressing the issue itself. Acknowledge the problem exists and let’s work together to solve it. Together, we find solutions.”

Renee Perry, Vice President CSR & ESG at CCL

Helpful tools and databases

Having access to appropriate tools will enhance the efficiency of risk assessments and aid in tackling both internal and external challenges. Companies have emphasized the utilization of various publicly accessible tools and databases to more effectively identify IUU fishing risks within their supply chains:

- RFMO Authorized Vessel Records
- RFMO IUU Vessel Lists
- National vessel license registration lists (when available)
- [Global Fishing Watch](#) products
- [Publicly Available Standard \(PAS\) 1550:2017](#)
- Sustainability resources including: [FishSource](#), [FisheryProgress](#), [Ocean Disclosure Project](#), and [Monterey Bay Aquarium Seafood Watch](#)

Case study: Culimer USA and Culinary Collaborations LLC



Culimer
USA

Highlighted Actions

1. Investing in internal processes to support transparency

CCL's institutional guidelines and processes for validating product information require internal capacity training and hiring specific staff (e.g., compliance specialists) who can identify risk points. Prioritizing traceability led to embedding GS1 and [Global Dialogue on Seafood Traceability](#) (GDST) standards in the company. CCL works with [Trace Register](#) and [Wholechain](#), both [GDST-capable](#) traceability solutions, to facilitate efficient supply chain data sharing. Recognizing that traceability platforms don't automatically equate to robust data verification, CCL also works with sustainable seafood consultant [FishWise](#) to embed a due diligence approach in its operations. This strategic approach informs various company processes, including verification, to achieve maximum impact.

2. Investing in collaboration

CCL acknowledges that engaging in trusted partnerships is essential to contributing to the responsible seafood movement. This is evidenced through a number of active collaborations.

NGO and multi-stakeholder collaborations keep CCL informed about prevailing industry and sustainability priorities while also enabling the company to contribute to collective solutions. Examples include:

- CCL stays apprised of industry best practices through NGO collaboration and leveraging external resources to strengthen sourcing decisions by: participating in [Sustainable Fisheries Partnership](#) (SFP) [Supply Chain Roundtables](#), participating in a [case study](#) with GS1 Standards, partnering with [FishChoice](#), leveraging the Monterey Bay Aquarium Seafood Watch, and receiving [Marine Stewardship Council](#) and [Aquaculture Stewardship Council](#) Chain of Custody certificates.
- FishWise worked with CCL to share its Sustainability and Tuna Sourcing Commitment publicly.
- CCL's engagement with the [Conservation Alliance for Seafood Solutions](#) facilitates connections with other NGOs, consultants, industry leaders, and initiatives and allows CCL to transparently share its journey of implementing electronic traceability to a multi-stakeholder audience.

Pre-competitive forums that provide an avenue for CCL to demonstrate leadership and opportunities to learn from fellow industry leaders, for example:

- By participating in the [National Fisheries Institute Sushi Council](#) and leadership program, CCL is an active part of the solution to move the industry forward.
- Joining the [Global Tuna Alliance](#) (GTA) has strengthened CCL's targeted efforts to meet key performance indicators outlined in GTA's [5-Year strategic plan](#). Part of committing to the GTA's strategy is sharing annual progress for better knowledge exchange.
- The [Global Food Safety Initiative](#) inspired CCL to begin performing product risk assessments for food safety, which have evolved to become more comprehensive in identifying IUU fishing risks.

3. Public-private coordination

The connection between government and industry is needed to develop effective solutions to prevent IUU products from entering CCL's supply chains and the U.S. market.

- The U.S. [Seafood Import Monitoring Program](#) (SIMP) has catalyzed CCL's supply chain transparency, increasing vessel-level transparency since SIMP's implementation. Because CCL imports species included in SIMP, they have vessel-level information for their products. CCL regularly initiates conversations with program auditors to ensure data is accurately reported and risks can be proactively mitigated across their seafood imports.
- CCL actively engages with the the [U.S. Customs and Border Protection](#) agency to support efficient legal verification and data transparency at ports.

4. Active advocacy

CCL takes pride in publicizing its advocacy demands and expectations of managing bodies to encourage more inclusive and effective seafood regulations. Advocacy opportunities are also often presented with the support of pre-competitive and collaborative groups, such as the GTA and [NGO Tuna Forum](#).

Looking to the Future

CCL is dedicated to achieving a future with full chain traceability and transparency that positively impacts people's lives and the broader community. Acknowledging the environmental, social, and economic advantages of transparent supply chains can inspire the seafood sector to seek innovative solutions, foster creativity, and establish transparency as a standard practice for both corporations and governments. By embracing technology such as vessel monitoring, seafood companies have ample opportunities to witness the impact of their investments in transparency and make substantial strides within the responsible seafood movement.

CCL believes that many of its challenges can be addressed by streamlining management guidance (e.g., across RFMOs) and preventing siloed country efforts to improve the adoption of agreed transparency and management practices. When government databases (e.g., national vessel lists, vessel monitoring system data) are transparent and accessible, it enables more efficient verification and risk analyses, allowing CCL and other seafood companies to target due diligence and remediation efforts. Automating verification can decrease human error and relieve capacity strains, making CCL better positioned to continue investing in responsible seafood sources. Strengthening the analytical power of traceability data can identify opportunities for companies to work within their supply chains to mitigate risks of IUU fishing and improve market resilience, sustainability, and livelihoods. Advancing these processes will allow CCL and other companies to achieve even greater transparency and reduce the risk of IUU fishing.

"This is a challenging task, and nobody possesses all the solutions. Together, I believe we are more capable, but there must be a willingness to engage in the unexplored territory and pose the difficult questions that some may shy away from."

Renee Perry, Vice President CSR & ESG at CCL

Case study: Comptoires Océaniques



Highlighted Actions

1. Actively engaging supply chains

Comptoires Océaniques leverages its long-standing supplier relationships to incorporate due diligence activities into its business practices, such as site visits and supplier self-assessments. One notable success was the development of a self-assessment questionnaire with the support of the SFP to better understand supplier's traceability and sustainability practices and provide further insights into products sourced.

2. Investing in partnerships and collaboration

Because Comptoires Océaniques values collaboration, it regularly engages in pre-competitive forums and dialogues and leverages sustainability consultants to stay informed of transparency best practices. Publicly available standards and resources, such as the GDST and the [PAS 1550](#) support data collection and sharing processes and enhance implementation of robust due diligence processes to address IUU fishing risks (also supported by a partnership with the consultant, 3 Pillars Seafood).

Comptoires Océaniques is also a member of several international, pre-competitive groups that are solutions-oriented and work to progress the sustainability of traded products. These groups, which allow Comptoires Océaniques to be transparent about challenges and opportunities while simultaneously learning from other member companies, include:

- The GTA, an international group of supply chain companies working pre-competitively to progress tuna's environmental performance and social responsibility. In addition to aligning on goals and strategies, these companies promote [advocacy efforts](#) often targeted at RFMOs, which oversee the management of critically important tuna stocks.
- [Amfori](#), a business association bringing together perspectives from sectors beyond seafood (e.g., textiles) and promoting collaboration to create sustainable trade solutions. Comptoires Océaniques' membership enables cross-sector knowledge exchange and access to guidance from [partnering organizations](#).

"We cannot do something alone...As the tuna supply chain, we progress together."

Alain Bailly, President and Founder of Comptoires Océaniques

Looking to the Future

Comptoires Océaniques recognizes that tuna supply chains are associated with higher risks to human and labor rights and believes that supply chain transparency

can help mitigate these risks. Although companies are increasingly addressing social responsibility in their business policies, the seafood sector now needs to collectively and effectively put these social responsibility policies and mitigation strategies into practice. In the future, Comptoires Océaniques is keen to explore what information can provide improved transparency about the working conditions in tuna fleets while also ensuring data privacy. Comptoires Océaniques sees this approach as an evolution and adaptation to specific circumstances. It is necessary to examine in detail the means of progress, which is why Comptoires Océaniques prioritizes certifications, but not exclusively. Comptoires Océaniques is mindful of purchasing and supporting non-certified sources that demonstrate a genuine improvement initiative.

As seafood companies continue to prioritize vessel transparency to assess legality, and social and environmental risks, Comptoires Océaniques expresses that it is critical to establish a collaborative effort among governments, institutions, companies, and NGOs to ensure complementary efforts. Although Comptoires Océaniques already collects data from their own supply chains, with improved accessibility to public tools and intentional government transparency (e.g., by publicizing national vessel registries), it would be able to accurately verify vessel information and more confidently assess IUU fishing risks.

"We need to be confident in our supply chains and responsible. When you take responsibility, you accept the issue, and you change it - you progress."

Alain Bailly, President and Founder of Comptoires Océaniques

Comptoires Océaniques envisions a future where companies are not afraid of transparency. As companies continue to be transparent, it shifts the narrative and allows for both imperfections and progress. Transparency is difficult, but by thoughtfully engaging across internal and external transparency efforts and initiatives, supply chain companies can uncover common challenges and more quickly progress in their efforts to combat IUU fishing. That is Comptoires Océaniques' goal for the future.

"It should be ingrained in the corporate culture to promote transparency, valuing honesty, integrity, and accountability."

Alain Bailly, President and Founder of Comptoires Océaniques

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