



April 12, 2021

Food and Agriculture Organization of the United Nations
Viale delle Terme di Caracalla
00153 Rome, Italy

Re: Draft for Public Consultation, Advancing end-to-end Seafood traceability: Critical Tracking Events (CTEs) and Key Data Elements (KDEs) along the wild capture and aquaculture value chains.

To the Members of the FAO,

Please accept the following comments on behalf of FishWise and the Seafood Alliance for Legality and Traceability (SALT) on the document titled *Advancing end-to-end Seafood traceability: Critical Tracking Events (CTEs) and Key Data Elements (KDEs) along the wild capture and aquaculture value chains*, henceforth referenced as KDE Guidance Document. We appreciate the opportunity to include comments from non-governmental organizations (NGO), like ours, who dedicate themselves to implementing robust traceability best practices to combat illicit behaviors and strengthen legality within global seafood supply chains.

FishWise and SALT agree with the FAO's creation of a centralized and harmonized KDE Guidance Document that includes current literature, initiatives, and standards, such as the Global Dialogue on Seafood Traceability (GDST). In addition to the detailed tables throughout the document, **we recommend including an aggregate table of KDEs as the product moves through the wild capture and aquaculture CTEs.** This summary table would be able to indicate which KDEs are kept throughout the supply chain as the product changes jurisdictions, necessary for end-to-end traceability as noted in section 1.2. Additionally, a table in this format would show overlapping KDEs that would be shared across jurisdictions as seen in some Harvesting KDEs that are shared by Flag, Coastal, and Port States. This tool would provide a visual representation of the data flow, help with identifying standardized KDEs across jurisdictions, and clearly identify what KDEs are specific to a jurisdiction.

[FishWise](https://fishwise.org) supports retail and mid-supply chain companies by leveraging traceability practices and technologies to identify and mitigate a variety of environmental, social responsibility, and traceability risks linked to seafood production. Our consultative approach stems from 17+ years of experience in seafood supply chain engagement and our expertise is trusted by human rights and conservation organizations, seafood buyers and suppliers, and government representatives alike. We work directly with companies to improve electronic data collection and traceability for seafood products in alignment with comprehensive policies and programs for environmental sustainability and social responsibility. Our close collaboration with the seafood industry to enact measurable changes to companies' seafood sourcing has resulted in a rich body of experiences from which FishWise, our partners, and



our colleagues may draw lessons from to advance the field of seafood traceability. We have built trusting relationships with industry, government, and civil society partners and have come to be considered thought leaders on traceability best practice and implementation.

In addition, FishWise leads the USAID-funded [Seafood Alliance for Legality and Traceability \(SALT\)](#). SALT is a global community of governments, seafood industry, and NGOs working together to share ideas and collaborate on solutions for legal and sustainable seafood, with a particular focus on traceability. SALT is a public-private partnership between USAID and the Packard, Moore, and Walton Family Foundations. SALT envisions a future with a more connected seafood community of industry, governments, and NGOs working together to promote comprehensive traceability systems. That outcome would grant wins for everyone: prevent illegally caught products from entering the market, strengthen sustainable fisheries management, and support equitable human welfare conditions for seafood laborers.

As a result, FishWise knows firsthand the challenges the seafood industry faces when adopting electronic traceability and we are heavily involved in uncovering industry experiences and perspectives on developing traceability regulations and global standards, such as the Seafood Import Monitoring Program (SIMP) and the GDST, respectively. From this work, we've uncovered a number of compliance barriers to traceability best practices that should be taken into account when implementing new policies. **We recommend including the below concepts in the KDE Guidance Document as design considerations:**

- **Be concise and begin by prioritizing the KDEs needed to verify legality. However, it is key to include language noting that KDEs and CTEs will expand over time.** When designing and prioritizing CTEs and associated KDEs, an analysis of what information is already required from regional management bodies and import regulations in seafood supply chains will streamline compliance and minimize burden on the industry.
- **When designing traceability systems and programs, interagency coordination is essential.** Governmental agencies within a country that have inter- and intra-agency coordination can better facilitate knowledge sharing, reduce redundancy, and improve efficiency of new traceability rules. Additionally, external coordination and outreach with diverse stakeholders facilitates co-design and buy-in of such rules. Many systemic sustainability challenges go beyond one company's supply chain control; for these issues we recommend working with coalitions of industry, NGOs, and other stakeholders to drive and scale change across groups of supply chain actors.
- We commend the FAO for providing a reference guide of CTEs and KDEs and agree that standardized data collection will streamline internal records and promote interoperability throughout seafood supply chains. Alignment of KDE formats will allow companies to more readily adapt their existing data management systems



currently collating supply chain data. Additionally, when that data is requested for multiple governmental purposes - food safety, port state or border control, labor or environmental measures - **ensuring data is recorded in electronic and interoperable platforms will help the industry submit required supply chain data more efficiently and allow for a coordinated approach to flagging risks, data analysis, and verification.**

Governments that create electronic traceability programs can maximize the return on their efforts when they collect data for ecological, social, and economic objectives to support initiatives such as strengthening fisheries management, improving the welfare of workers, and making operations more cost-efficient. To make it easier for governments to create traceability programs that address those three objectives, SALT, in partnership with 35 experts from 17 countries, created the [Comprehensive Traceability Principles](#) and an associated step-by-step [Pathway](#) to help implement the Principles. Tools like the new Comprehensive Traceability Principles and the Pathway are essential for helping supply chains address some of the traceability challenges outlined above. The Principles recognize that all seafood producing country governments have the authority and responsibility to implement policies for reducing risks to workers and for the ecological and economic management of their fisheries.

We recommend including the Comprehensive Traceability Principles as a resource in the final KDE Guidance Document:

- **Support producer governments to implement electronic traceability.** The Principles contain key themes for governments to consider when creating comprehensive traceability programs and a curated repository of resources and guidance as governments work through this process. Additionally, the broader SALT website acts as an online learning and knowledge sharing platform with a larger library of resources and a map of global traceability and IUU initiatives. **Once finalized, SALT looks forward to including FAO's new KDE Guidance Document in our repository of resources for governments and the seafood sector to reference.**
- **Traceability data for environmental, social, and economic benefits.** As part of its greater focus on comprehensive traceability, SALT has conducted an analysis to determine which KDEs can be leveraged for both environmental and social responsibility, helping to prioritize KDEs that have dual purposes. Data collection with a holistic lens to include labor rights data alongside environmental data can help companies tackle regulatory, traceability, and sustainability challenges together rather than in silos. Using KDEs for multiple purposes streamlines data collection that can decrease the burden on the seafood industry while providing interagency collaboration opportunities for human and labor rights-focused government agencies and fisheries-focused agencies.



- The SALT community is made up of more than 1,000 active participants and experts from around the world, including the International Union for Conservation of Nature (IUCN) and governments from Chile, the European Union, Ghana, Indonesia, Japan, Philippines, Tanzania, the United States, and Southeast Asia. Given interest from countries like Belize, Ecuador, Peru, and Mexico and ongoing IUU fishing issues in Ecuador and Chile, in FY2021, SALT will facilitate various traceability and counter-IUU fishing dialogues in Latin American and the Caribbean around the Comprehensive Principles. SALT's increased coordination with governmental agencies to implement the Comprehensive Traceability Principles also provides an opportunity to utilize the FAO's KDE Guidance Document to advance end-to-end traceability. **SALT welcomes this avenue to build a closer working partnership with FAO in order to communicate harmonized traceability guidance to governments.**

We thank the FAO for taking leadership on this important topic, allowing for the opportunity to provide input, and for all of its excellent work to date to address IUU fishing, traceability, and social responsibility. We believe a holistic, collaborative approach to these issues has the potential to create a strong foundation of transparency and coordination that will allow for aligned information sharing and real change on the water.

Please contact FishWise or SALT with any additional questions.

Sincerely,



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