

**Sustainable Development Commission
response to the Review of Food Standard
Agency's Advice on Fish Consumption**



The Sustainable Development Commission (SDC) welcomes the opportunity to comment on the Food Standards Agency's review of its advice on fish consumption.

The SDC is the Government's independent watchdog on sustainable development, reporting to the Prime Minister, the First Ministers of Scotland and Wales and the First Minister and Deputy First Minister of Northern Ireland. Through advocacy, advice, appraisal and capability building in government departments and agencies, we help put sustainable development at the heart of Government policy.

The SDC report, *Green, healthy and fair*¹ found that whilst Defra has led on creating a vision for sustainable fisheries² there is a lack of alignment between the current scientific consensus on the sustainability of fish stocks and the Food Standard Agency's (FSA) healthy eating advice for most people to eat more fish. We recommended that FSA work with Defra to align its advice on fish consumption for health with evidence on sustainable sourcing. We therefore welcome the FSA's move to embed sustainable development into its advice to consumers on fish consumption, based on its statement of approach on sustainable development in policy making, as agreed last year.

This response will seek to build on the recommendations in *Green, healthy and fair*, using sustainable development as a lens through which to examine how the FSA can provide integrated advice to consumers on fish consumption.

Providing integrated advice to consumers

The consultation paper proposes the development of an 'information hub' which would 'offer links to other sources of information and advice to enable choices that take into account other aspects of sustainability'.³ The SDC very much welcomes this proposal, especially given our recommendation in *Green, healthy and fair* and the action identified in *Food Matters* that the FSA will provide a one-stop shop to consumers looking for information and advice on nutrition, food and sustainability, and food safety.⁴ The 'information hub' therefore presents a vehicle through which the FSA can provide integrated advice to consumers.

The consultation paper does not however go into detail about what the information hub might look like in practice. It is essential that the hub helps consumers (and others including retailers, manufacturers and caterers) make more informed choices. As 'the emphasis would be on facilitating access to information rather than interpreting or duplicating it', it is important that the FSA provides access to high quality information and advice that is user-friendly, easily understood and therefore helps people to make choices. One pertinent example is the important role the FSA has played in facilitating 'interpretation' of complex nutritional information using traffic light labelling.

The SDC understands that the FSA is not an 'expert' authority on the issue of sustainability of fish and therefore recognises that the FSA needs to continue to work with others including Defra, DH, NGOs and industry bodies) to ensure consistency of messages and advice. Additionally, the FSA has an important role (along with the aforementioned partners) to communicate the presence of the 'information hub'. It is equally important that this work is carried out in a timely manner in order to support Government's broader work on developing a vision for a sustainable food system.

Recommendations:

- FSA to ensure the 'information hub' provides easily understandable information and advice that can be used by consumers and (and others including retailers, manufacturers and caterers) make more informed choices
- FSA to work with partners (including Defra, DH, NGOs, industry bodies) to ensure consistency of integrated messages and advice on fish consumption
- FSA to identify a target date for delivery of the 'information hub' to support Government's development of a vision for a sustainable food system.

Advice on sustainable sources of fish

The Marine Stewardship Council standard is recognised in the UK and internationally as indicating sustainable and well-managed fish. With a rising number of certification applications for mackerel and herring fisheries⁵, consumption of these oily fish and other certified fish species should be encouraged. Due to past mismanagement, and therefore sporadic availability, UK consumers are now out of the habit of eating mackerel and herring. Now that these species are available from sustainable sources, the FSA could play a role in influencing consumer taste and re-familiarising consumers with these fish.

The SDC therefore welcomes the FSA's proposal to provide information to consumers on choosing from a wider range of sustainable species.

As the consultation paper points out, the role of retailers, manufacturers and caterers is significant in supplying fish from sustainable sources. The Seafood Choices Alliance has set up *Good Catch*, a UK-based initiative that directs foodservice professionals to a range of user-friendly materials and activities that are specifically designed to help restaurants and related businesses improve the sustainability of the seafood they buy, serve and promote.⁶ *Good Catch* draws on the existing work of the Marine Conservation Society (MCS), Marine Stewardship Council (MSC), Sustain and the Seafood Choices Alliance. In particular, the MCS has developed an online resource to enable retailers, chefs, restaurateurs, and individual consumers to make an informed and sustainable choice.⁷

The *Responsible Fish Restaurants* initiative is working to improve the sustainability of fisheries by helping chefs make better choices of fish, thereby creating buyer-driven pressure for change.⁸ The Sustainable Fisheries Partnership is also committed to helping seafood producers and buyers to promote the long-term security of their own supply by improving fisheries conservation – this includes helping less well-managed fisheries meet the environmental requirements of major markets.⁹

Recommendations:

- FSA to actively encourage consumption of currently sustainably managed sources of oily fish including herring and mackerel
- FSA to provide consumers with information on retailers, caterers and restaurants which supplying sustainably sourced fish

Choice editing to offer more sustainable options to consumers

Research on European consumer attitudes shows that seafood purchases are driven largely by quality considerations, but 79% report that environmental considerations are also important, and more so than price or convenience.¹⁰ Other key messages from the research are that consumers want more information on sustainable seafood and point of purchase labelling. Importantly, they also want government and retailers to bear most of the responsibility for providing sustainable choices.¹¹

In *I will if you will*, the Sustainable Consumption Roundtable offered a solution for making sustainability simpler for consumers. Choice editing for sustainability is about shifting the field of choice for mainstream consumers: cutting out unnecessarily damaging products and getting real sustainable choices on the shelves. In the context of high consumer concern, but low levels of action, the idea of integrating the most compelling issues of sustainable development makes sense.¹² The result provides customers with a better choice of products and makes it easier to 'do the right thing'.

Defra's recent research on pro-environmental behaviours found that people's understanding of sustainability and climate change is low with only tenuous links to food.¹³ People look to both business and government to take a lead on encouraging pro-environmental behaviour - they ask government to offer guidance and direction and regulate if necessary, and business to make sustainable choices clearer whilst improving the fairness of their supply chains.

Green, healthy and fair noted that some supermarkets are addressing sustainable supply chains by choice editing. For example, Marks and Spencer plans to only sell fish that is MSC-certified, whilst Sainsbury's aims to convert its top five selling fish species to 'green status' by 2010.

However, retailer initiatives to promote diet-related health have had mixed results: labelling schemes have been implemented in a way that causes consumer confusion (some retailers are using Guideline Daily Allowances (GDAs), others traffic light labels) It should be noted that the Shellfish Association of Great Britain has developed traffic lights to show how a portion of shellfish (100g) can contribute to a healthy diet.¹⁴ It still remains however that price signals and health messages are not congruent, so the healthiest foods are perceived to be most expensive, and the high calorie, high energy, poor nutrient foods are cheap.

Recommendation:

- FSA with Defra to harness the choice-editing role of supermarkets to influence consumer awareness by supplying sustainably sourced fish and shellfish

Comments on Impact Assessment

Three quarters of the world's fish stocks are fully, over or significantly exploited.¹⁵ In the UK, there is increasing reliance on imports and farmed fish due to a declining fishing fleet and fish stocks.¹⁶ Around 90% of the UK fish farming industry is based in Scotland, particularly in the Highlands and Islands.¹⁷ Aquaculture has been found to be the only way to meet increasing demands for seafood. Farmed salmon accounts for nearly 40% of Scottish food exports.¹⁸

The Aquaculture and Fisheries (Scotland) Act 2007¹⁹ seeks to address certain issues relating to sustainable fish farming, including escape and recovery of fish, and parasites. However, there is still the need to tackle the problem of sustainable sources of feed for carnivorous fish (e.g. salmon, trout, halibut, cod) as the implications of continuous large-scale exploitation of industrial or feed-grade fish are poorly understood.²⁰ Furthermore, there is evidence to show that farmed fish have more oil, but a poorer ratio of omega-3 to omega-6 fatty acids and therefore reduced health benefits.²¹

Eco-friendly mussel farming provides a source of highly nutritious food. It has been recognised that whilst current inshore production is both commercially and environmentally sustainable, the capacity for growth is limited due to unreliable seed resources, competition for space and uncertain water quality.²² However, further development of offshore mussel farming would bring with it a wide range of sustainable development benefits including a high quality product; health benefits; environmentally benign production; carbon sink; growing market.²³

There are also positive implications for food security from an increased demand for fish from sustainable sources, if, as the draft impact assessment points out the corresponding market response places the UK fish industry in a better adjusted position to supply world demand for sustainable fish.

Recommendation:

- FSA to include in its final impact assessment benefits to food security from a move to increasing demand for sustainably produced fish and shellfish.

The SDC looks forward to engaging with FSA in its future work, and in particular in providing input and advice to support the development of the 'information hub'.

Endnotes

- ¹ Sustainable Development Commission (2008), *Green, healthy and fair – A review of government’s role in supporting sustainable supermarket food*.
- ² Defra (2007) *Fisheries 2027: A long-term vision for sustainable fisheries*. London: Defra.
- ³ Paragraph 2.
- ⁴ Cabinet Office (2008), *Food Matters: Towards a Strategy for the 21st Century*, p. 117.
- ⁵ See http://www.msc.org/html/np_10.htm
- ⁶ See <http://www.seafoodchoices.com/whatwedo/goodcatch.php> and <http://www.goodcatch.org.uk>
- ⁷ See <http://www.fishonline.org>
- ⁸ See <http://www.pisces-rfr.org/UK/Home.html>
- ⁹ See <http://www.sustainablefish.org/main/home>
- ¹⁰ Seafood Choices Alliance (2005), *Constant Cravings: The European Consumer and Sustainable Seafood Choices*, p. 5: <http://www.seafoodchoices.com/resources/documents/EUConsumer.pdf>
- ¹¹ Ibid at p. 2.
- ¹² Sustainable Development Commission/National Consumer Council (2006), *I will if you will – Towards sustainable consumption*, p.16.
- ¹³ <http://www.defra.gov.uk/environment/business/scp/research/themes/theme3/sustainable-consump0607.htm>
- ¹⁴ <http://www.shellfish.org.uk/assets/Images/Traffic-1.pdf>
- ¹⁵ UN Food and Agriculture Organisation (2007), *The State of World Fisheries and Aquaculture 2006*.
- ¹⁶ Cabinet Office (2007), *Food, an analysis of the issues*, p.57.
- ¹⁷ <http://www.scotland.gov.uk/Topics/Fisheries>
- ¹⁸ Challenging the myths about Scottish salmon farming, Presentation by Ken Hughes, Scottish Salmon Producers’ Organisation, Firth of Clyde Forum 12th July 2007:
<http://www.clydeforum.org/info%20event%20aquaculture/Firth%20of%20Clyde%20Forum%20-%20presentation%20-%20OSSPO%20Ken%20Hughes%20-%20aquaculture%2012%20July%202007%20pdf.pdf>
- ¹⁹ <http://www.scottish.parliament.uk/business/bills/67aquaFish/b67s2-introd.pdf>
- ²⁰ Marine Conservation Society (2007), Principles and Criteria for Sustainable Fish Farming:
<http://www.mcsuk.org/downloads/fisheries/SustainableAquaMay07web.pdf>
- ²¹ Food Commission (2004), Fish – made of soya? : http://www.foodcomm.org.uk/6_7.pdf
- ²² Holmyard, J. *Potential for Offshore Mussel Culture*, Shellfish News 25, Spring/Summer 2008.
- ²³ Ibid.