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# Traceability Assessment Summary Report

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## Cook Islands Fishery Supply Chain from Vessel to First Point of Sale - Luen Thai Fishing Venture -

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**Public Summary Report**

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## Overview of Assessment

### Supply Chain

This report presents an overview of the assessment and findings of a traceability assessment of fish caught by the Luen Thai Fishing Venture (LTFV) fleet originating from the Cook Islands Exclusive Economic Zone (EEZ) undertaken by Iain Pollard and Dominic Chakra for LTFV. The aim is to systematically evaluate the traceability of fish (focussing on albacore tuna) from the catching vessel to first point of sale against the MSC CoC (Marine Stewardship Council Chain of Custody) and ISO 22005 standards and make recommendations to strengthen procedures towards MSC standards and international best practice.

LTFV catches fish (predominantly Albacore tuna but also some Bigeye, Yellowfin, and other species) with its own vessels operating primarily in the Cook Islands EEZ as well as on the high seas. Fish is landed directly to Hua Nan Fishery Cook Islands Co. (HNFCIC) at landing sites in American Samoa, Rarotonga and Tahiti by 20 LTFV owned longline fishing vessels. Traceability is important for LTFV and systems have been put in place to ensure that all product sold is fully traceable to source. This assessment verifies the claim, tests the validity and recommends improvement.

### Scope

HNFCIC is a Cook Islands registered company, established in August 2013. It is a subsidiary of LTFV which has its headquarters in China. For this project the client, LTFV has instructed Iain Pollard to carry out a traceability assessment for HNFCIC from catching vessel to first point of sale. The scope as defined by the client is summarized in the table below.

**Table: Scope of the Assessment**

Fishery	Species	Client Activity	Scope (Form)	Storage	Presentation	Handled
Cook Islands EEZ	<i>All species (with a focus on Albacore Thunnus alalunga)</i>	Catch, unloading, first sale	Frozen cleaned	Fresh and Frozen	Loose	Yes

Interviews were held with key staff responsible for the management, handling, recording and control of fish. Overall responsibility for coordinating activities relating to sustainability is Dr. Eric Gilman – LTFV Sustainability Manager. However, he is not involved in the day to day handling or management of fish and Mr. Joe Murphy who arranges sales has oversight responsibilities. With regard to physical handling of materials Mr. Vincent Dong and Mr. Wing Zhuang are responsible for traceability at Rarotonga and Pago Pago respectively. Mr. Hill Zhu manages Vincent and Wing and maintains responsibility for traceability information and logistics.

## Summary of Findings

The LTFV Group of companies have effective traceability and product control systems in place that ensure the catching vessels, periods, and landing dates can be demonstrated at all stages from catch to outgoing product via sealed container. Weights of incoming and outgoing materials can be accounted for ensuring that batch reconciliation is demonstrable. Evidence was found that the policy and Standard Operating Procedures (SOPs) covered the handling and key risk areas.

There were however minor weaknesses identified in the traceability system that could lead to confusion over product characteristics and difficulty in achieving international traceability standards. The weaknesses could lead to misinterpretation of traceability data and could limit the extent of claims over the source. It is recommended that these weaknesses be addressed to strengthen the system and mitigate the risks of confusion over the precise catching source.

Due to the simplicity of the operations and robustness of traceability there is minimal risk of mixing non-MSA certified with MSA certified fish. There are however some points in the chain of custody that could be strengthened (as shown in the table below) in order to meet international standards.

**Table: Risks of mixing batches including MSA and non-MSA**

Chain of Custody	Description	Risk of Mixing
Receipt of MSA fish from the vessel	The key control point is to accurately identify whether the trip is MSA eligible and to record this on accompanying documentation and records.	Low
Unloading	If there are multiple vessels unloading at the landing site then care must be taken not to mix material from different vessels.	Low
Storage in the container	If product from more than one vessel is being stored in the container then both netting between vessels and tagging of MSA certified tuna should be used to avoid batch mixing.	Low
Management	Human error is always a risk of mixing MSA with non-MSA. In order to minimise this risk it is important that SOPs cover all aspects of handling, staff are well trained and operations are regularly checked by internal audit/review.	Low

## Recommendations

Traceability is robust and there are strong management and control systems in place to ensure the vessel and trip details are available for fish from vessel to final delivery via container. However some weaknesses were identified against international standards that if corrected would strengthen traceability. It is therefore recommended that a corrective action plan is developed that addresses the risks and weaknesses identified with a specified implementation timeline.