

Notes on SECLG bite-size meeting. Wednesday 2 September 2020. Dynamics around setting and benchmarking at-sea baseline social criteria.

As an industry we need to develop a common means to determine the acceptable baseline for assessing social criteria at sea. This Seafood Ethics Common Language Group bite-size meeting explored the principles that are helping to shape this conversation to see if it is possible to adopt one common way to assess at sea social criteria and agree what that includes. This looked at the initiatives currently underway; explored whether certification is the answer; if a simpler model can support the introduction of best practice and due diligence; and if benchmarking can bring all this into alignment.

Social Responsibility Assessment Tool (SRAT) for the seafood sector. Charlotte Opal, FisheryProgress.org. Key points:

- The SRAT is based around the Monterey Framework for socially responsible seafood and has three core principles/pillars (and six components): to protect human rights, dignity and access to resources; to ensure equality and equitable opportunity to benefit; and to improve food, nutrition, and livelihood security. This mirrors the Marine Stewardship Council in structure. SRAT incorporates existing relevant social standards and ratings as well as the language used within those.
- The development of the SRAT is based on two key documents. It will be used to assess social improvement in Fishery Improvement Projects (FIPs), as listed within FisheryProgress.org. The Conservation Alliance and FisheryProgress.org have pilot tested the tool in a mix of FIPs.

Discussion

- **Q. Will there be support and guidance for FIPs on reporting using SRAT?**
A. The SRAT is voluntary. It will be on fisheryprogress.org. Some of the reporting will be mandatory, most will be voluntary. It is possible to choose which areas to report on - FIPs can choose which sections are most relevant. The assessment needs to be conducted by an independent trained expert where applicable.
- **Q. Is there a process to follow to ensure victim protection?**
A. There is guidance on how to handle this. As part of the ethos of FIPs they do already admit they need to make improvements. This tool helps guide this process. The FIPs need to recognise any problems there may be.
- **Q. Will there be funding available to support this process?**
A. There will be training to help the self-assessment process, as this does not have to be a third-party independent assessor for everything.
- **Q. How often will the fishery need to update their assessment?**
A. For environmental considerations a review is undertaken every six months. This is likely to be the same for the human rights aspects, with a full review every one to three years.
- **Q. The unit of certification for a fishery is multiple vessels, often all in the fleet. The unit for social standards is a single vessel or group of vessels. How do we correlate environmental and social considerations in SRAT?**
A. There can be a massive difference in the size of FIPs. The social review is intended to match whatever is being looked at on the environmental side with regard to the number of vessels. We do recognise that this can be a huge undertaking.
- **Q. What would be the main drivers for a FIP on Fishery Progress to complete part or all of the SRAT? Is the idea to encourage the supply chain to ask for it etc?**
A. The tool is voluntary and can live on its own. Buyers are interested in this information particularly in Europe. They are increasingly aware that they need to cover all issues of sustainability. The main driver is that buyers are seeking this information in a uniform way.
- **Q. In the case of red (high risk), what is the path to reporting 'critical issues' to port authorities? Whose responsibility is that?**

A. SRAT is not a certification system so there is no prescribed route. There will be guidance on next steps and there needs to be a record that mitigation has been put in place.

Further information

- [Social Responsibility Assessment Tool \(SRAT\) excel spreadsheet](#)
- [FisheryProgress.org](#)
- [FisheryProgress.org social policy](#)

Marine Stewardship Council (MSC) policies on forced and child labour. Leah Buckley, MSC.

- The MSC labour policy has developed since 2014. All MSC-certified fisheries and at-sea supply chain organisations are required to publicly report on the measures being taken to address forced and child labour within 13 sections. The reporting framework and the questions posed were described. The templates facilitate open reporting. This supports knowledge gathering and insight into what is happening on a vessel.
- Looking ahead the MSC is undertaking a review and analysis of the templates (400 units of certification) – the report is due to be published at the end of the year; it is also looking to develop its Policy of Association and engaging in projects on grievance mechanisms, as well as funding a £100,000 research project into observer safety.

Discussion

- **Q. With regards to questions on recruitment on the template do you ask that providers are certified or licensed, either in-country or in the receiving country?**
A. The template does not set criteria for what information needs to be provided. If certified fisheries are engaged with various recruitment initiatives they can talk about this. It is not clear at the moment what proportion of fisheries are actively working with these schemes. The templates are more a transparency tool with no specific requirements as to what should be included when responding.
- **Q. Following the requirement brought in in 2019 how are supply chain companies being assessed for level of risk for labour violations given 'low risk' can be exempt from labour audits – how are risk ratings determined and will these be shared publicly? Is risk rating at country level?**
A. The MSC tool is publicly available. It is based on activity and country (using clear external indicators – all equally rated). There have been comments that country is not the only relevant indicator and we are looking at this.
- **Q. How are you working with FisheryProgress.org? How will their social criteria impact on any move into the MSC certification process?**
A. MSC and FisheryProgress have different requirements and expectations. Any work that a FIP does with regards to addressing social criteria will help them report within the MSC template. MSC has a place on the FisheryProgress Technical Advisory Committee. We see this as a complementary learning tool and are looking at how we could maybe adopt what they are doing.

Further information

- [MSC Certificate Holder Forced and Child Labour Policies Practices and Measures Template](#)

The Consumer Goods Forum's (CGF) Sustainable Supply Chain Initiative (SSCI) At-Sea Operations update. Thomas van Haaren, CGF. Key points:

- The SSCI is a CEO-led industry association with around 400 members (retailers and manufacturers) from multinationals to SMEs. It is a benchmark designed for third-party sustainability standards modelled on the success of the Global Food Safety Initiative (GFSI). It provides clear guidance on credible standards and sets realistic expectations to recognise those programs that meet industry expectations.

- The SSCI At-Sea Operations social compliance criteria aims to ensure all relevant topics are covered by a scheme. It is based on international references and alignment with UNGP, ILO, OECD guidance etc.
- An open consultation process with 20 formal responses has just completed on the criteria. The main discussion points have been: living conditions on vessels; minimum age expectations; recruitment agencies and forced labour risks; forced labour detection; working hours; large versus small fleet operations; and mobile fleets and multiple jurisdictions; and fleets versus independent/artisanal vessels.
- Other CGF programmes are looking at land-based programmes and aquaculture.

Discussion

- **Q. I see this as helpful to good operators wanting to be identified as good business partners. I'm not convinced this will stop bad practice operators and IUU etc. So will this change anything? There is a concern this is consolidating what is already good but not really addressing the bigger problems.**
A. This is the first time that there has been a real focus on what is good. This will create a benchmarked list, and support one area of a buyer's decision tree, which should free up more time to focus on other areas.
- **Q. What percentage of CGF members' wild capture seafood supply chains are already using one of these social-focused schemes?**
A. Many are in the pilot stage. It's been a significant step forward. I have no exact number on who is using third party programmes.
- **Q. How often will the baseline be reviewed as some elements are quite basic?**
A. We endeavour to review criteria every two to three years at a minimum. In some areas we are looking at virtual audits. Obviously if new issues come up we can look at this.
- **Q. Incidence of IUU – how do you bring bad players into this? Do you have any engagement with governance to change legislation?**
A. CGF does not often engage directly with Government. We usually engage through trade association, trade bodies and individual companies. We will work directly with some companies to influence bad players. This is designed to be a tool for buyers.
- **Q. It seems a common theme for people/organisations to refer to social issues or environmental issues, for example, and therefore monitor and report such topics separately. COVID-19 and climate change shows us that these issues are all interconnected and not separate. Is there desire or a vision from the industry to have public, centralised, web-based measurement tool(s) that capture social, environmental and economic matters altogether to provide full context and transparency? Also specifically for aquaculture?**
A. All this benchmarking is heading towards that and CGF is working in a number of different arenas. We do not want to work in silos but because of the nature of the work we tend to take a piecemeal approach. This is what FisheryProgress is trying to do, but they only work in wild capture. I have never seen any neutral central information repository like that in other sectors, except maybe Sedex (which isn't public).
- **Comment. The more the industry leads this, perhaps the more that governance may change. Maybe industry initiatives will force more Member States to ratify the big four including FAO and ILO Conventions and Agreements. But China? China is the elephant in the room!**
A. The goal is continuous improvement. We need to make sure we speak a common language and all understand what we mean by the core issues and elements such as forced labour and child labour etc.

Further information

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- **GSSI Technical Manager: Eva van Heukelom, eva.vanheukelom@ourgssi.org**
- **[Sustainable Supply Chain Initiative \(SSCI\) At-Sea Operations consultation.](#)**