

We are seeing the growth of voluntary labour certification standards to demonstrate socially responsible labour practices on vessels in wild-capture fisheries. This Seafood Ethics Common Language Group bite-size meeting looked at how these voluntary standards and initiatives have developed and are evolving, and how they could be benchmarked in the future.

New FISH (Fairness, Integrity, Safety and Health) Standard for Crew. Mike Kraft, FISH Standard.

- This explained what is included in the new FISH Standard for Crew and its framework, its scope and the business model. The Standard aims to deliver a global programme for credible, third-party certification for crew harvesting wild caught seafood.
- FISH Standard is based primarily on International Labour Organisation (ILO) Work in Fishing Convention 188 (C188) and related Guidance. It uses a practical interpretation of C188 and covers most core ILO areas. FISH Standard covers some areas not specifically addressed by C188 but that are covered in other ILO conventions or Universal Declaration of Human Rights articles. There are a few areas where FISH consciously deviates from, or partially aligns with, C188 – in these cases all terms are defined in accordance with best practice.
- It is a business-to-business tool to provide assurances that a vessel has been audited through a credible system - not a consumer-facing logo. This is a lean operation - it is not intended to be a revenue-generating scheme.

Discussion

- **Q. How quickly are you planning to roll out this standard?**
A. We are sifting through the comments we received from the consultation exercise (over 150 public comments). This will be presented back to the Board in late April. We are looking at pilots starting early in Quarter three, although COVID will influence this in terms of travel and access restrictions, as we must be able to interview crew.
- **Q. How are the indicators/criteria assessed and by who?**
A. We have produced an auditor guidance document. This is a standard reference document which has not gone out for public comment. This provides all the details expected to help guide the auditor. We will only be using trained and accredited auditing companies, and the lead auditor must be trained in social audits.
- **Q. How will worker feedback be captured within the scope of the standard? What grievance mechanisms will be in place?**
A. Grievance mechanisms are part of the standard, but as we all know this is an evolving landscape and this is challenging, especially with small vessels. Crew interviews will be part of every audit. We will interview a sample of the crew in their language. We have not set a protocol yet for how crew could contact the auditor directly.
- **Q. Will this scheme have a written global standard?**
A. The draft Standard that was issued for public comment is on website. We will also make the final certification framework, and the auditor guidance, publicly available.
- **Q. You mentioned that the auditors will need to have social experience. Will you be working with or leveraging the Association of Professional Social Compliance Auditors (APSCA) for this to ensure auditors know best practices from their experience in other industries?**
A. We have been discussing APSCA internally, and we have also consulted with the auditing bodies. The field of social audits on vessels is a fairly new field. As the demand for this sort of certification grows there will be the need for a pool of auditors with fishery experience. We are trying to decide how we create these pools of auditors without making it too restrictive in the early stages.
- **Q. Have you conducted any pilots or testing to see how it works for different sizes and types of fisheries?** **A.** Nothing on the ground yet, this is the next step.
- **Q. There was mention of the fact that it is not intended to be a revenue-generating scheme. What does this mean. Are you seeking a different path?**

A. We want to ensure enough money to operate but not beyond this.

- **Q. What kind of grievance mechanisms are you wanting to find on vessels for them to meet the standard and how will their effectiveness be verified by the auditors?**

A. Regarding grievance mechanisms we have not been overly prescriptive on the type of system but have focussed on a list of underlying components, in line with how the Sustainable Supply Chain Initiative (SSCI) is developing and looking to respect confidentiality. This is a fine line to walk. We need to treat information as confidential to ensure safety.

Further information

- **Mike Kraft, Executive Director, FISH Standard for Crew** mikekraft@fishstandard.org
- **FISH Standard for Crew website**

Update on the Responsible Fishing Vessel Scheme (RFVS). Mike Platt and Melanie Siggs, Global Seafood Practices (GSP).

- Testing both Fleet/Group and Single Vessel Certification Models Certification Body Requirements have been completed and are being tested. Four Group and 10 single audit pilots are underway.
- Compliance Guide for both Applicant and a more detailed one for Auditors have been completed and are being reviewed to ensure they give enough detail to support both parties.
- Auditor training and the challenges of APSCA registering is being evaluated – Auditors with no vessel experience have developed a bespoke foundation course on vessel operations.
- Central Management System Requirements – more training support will be given to Group/Fleet applicants on what is required, as this will need to give assurance to the Certification Body that the vessels in a group are working in compliance to the RFVS.
- Remote Auditing – have looked to see how digital platform could be used which would make the auditing for vessels more cost-effective. Trials have taken place with several vessels across the globe.
- The RFVS Certification Model will go for Accreditation now that RFVS has vessels certified to it and we are confident it will meet the requirements of ISO 17065.
- The RFVS Program will go for SSCI ASO benchmarking when this benchmark tool has been completed and GSA is playing an active role in feeding back into this process
- The Standard is open to new applicants from April 2021.

Discussion

- **Q. What is the GSA/GSP position on mandatory Human Rights Due Diligence (mHRDD) for all participants and audits - mandatory or voluntary? How will you follow up crew reporting of egregious human rights abuses? Crew fear loss of their jobs as a starting point. They also do not trust outsiders.**
A. Once we have done a vessel assessment we need to make sure, on an annual basis, that vessels complete a self-declaration from to demonstrate they meet the eligibility criteria, one of which covers human rights, and the need to maintain it. If they are found to be in breach vessels certification status can be removed. If an auditor has concerns during crew interview which raises questions about crew welfare in the first instance the auditor has to ensure his own safety and must protect the confidentiality of the crew member(s). Once this comes back to GSP it would be a GSP responsibility to follow up on this with the appropriate authorities. This also links with the GSP Worker Voice programme and the need provide a mechanism to address those issues.
- **Q. There are now a plethora of labour certification standards, such that it is a challenge to keep up with all of them! Is there a 'gold' standard? If so, which is it? If not, how realistic is it to work towards this? How does this either link with or compete with the RFVS? It is always good to have healthy competition between standards but there are worries over duplication.**

A. Global Seafood Assurances has signed Memorandum of Understanding (MoUs) with Thai Union and OPAGAC and GSA intend to continue those. The aim is to recognise at least parts of other standards and possibly share auditor training. There will be parts where there will crossover with other standards. There is a lot of knowledge sharing, looking for equivalencies and attempts to reduce audit costs. The SSCI At-Sea Operations (ASO) Benchmark is likely to be the key reference point for different standards and certification programs. Global Sustainable Seafood Initiative (GSSI) has already done this for seafood environmental standards. We need these benchmark programmes to create space to work together. Collaboration is the way forward. We don't want to create audit fatigue.

- **Q. Are you speaking with port welfare organisations and port chaplains?**

A. Not at the current time. I'm sure as we all certify more vessels, learn more, we will see where and when we need to include interviews such as you suggest and adapt accordingly. I think as auditors gain experience in this area we will understand how to adapt to different situations, appropriately. Still very early days for all the vessel standards. The role of such parties will be better understood by standard holders and auditors as an outcome of our Worker Voice project work.

- **Comment.** Key will be to ensure that any new standards development and early audits do not miss picking up outreach from vulnerable crew, and the auditor's understanding for accessing and alerting the correct agencies who can support victims. HRAS is increasingly concerned about the credibility of third-party audits and auditors after the He Shun 38 (Fiji) case, for example.

Further information

- [Responsible Fishing Vessel Standard \(RFVS\)](#)

[FisheryProgress Fishery Improvement Project \(FIP\) social policy and Social Risk Assessments \(SRA\).](#) Kristin Sherwood, FishChoice.

FisheryProgress has been developing a long-term social policy, which will impact FIPs, with guidance from experts, since autumn 2019. The diverse feedback from two consultations have been addressed. They are currently finalising the policy and creating detailed guidance and templates. As a starting point the core principle mandatory requirements in the first draft were:

- 1. Sign the Human Rights Code of Conduct
- 2. Provide a list of vessels included in the FIP
- 3. Ensure that fishers in the FIP are aware of their rights and have access to grievance procedures to seek remedy if their rights are abused
- 4. Complete a human rights risk assessment each year
- 5. Create a workplan to address high-risk issues
- 6. Report publicly on risk assessment results and action progress

The agreed guidelines (which could still be amended) were shared with those on the webinar. The new policy is due to launch mid-May 2021.

Discussion

- **Q. There is quite a lot of demand on FIP leaders. What sort of support will be made available to them? I know that guidance documents are being produced but how much help will be given in running these human rights social risk assessments? This could be challenging as and will require a different team and different expertise. There may be some very specific questions. Will there be someone on hand to answer these questions?**

A. We have allowed time for this to be adopted. It is one year before they will have to start reporting. We will focus on one-on-one interaction with those FIPs that need support and there will be strong engagement. FIPs will need to bring in expertise to do this due diligence work and FisheryProgress will provide a list of people who can help them. Some FIPs are already working in this area and have started to tackle these issues. We need to help them

to map their data and take the information obtained from social audits, into the SRA and then onto the FisheryProgress website, and make the whole process easier to do. FisheryProgress wants to build a multi-disciplinary team to help with this,

Further information

- **Contact Kristin Sherwood** Kristin@fishchoice.com
- [FisheryProgress Social Policy](#)

[Global Sustainable Seafood Initiative \(GSSI\)/Consumer Goods Forum \(CGF\) Sustainable Supply Chain Initiative \(SSCI\) At-Sea Operations Framework](#). **Thomas van Haaren, CGF.**

The SSCI aims to help build trust in sustainability standards worldwide by benchmarking schemes against the SSCI Social and Scheme Management Criteria, driving alignment among the many different third-party audit and certification schemes that assist companies in their supply chains due diligence. The key themes from the start have been minimum age expectations, forced labour detection, and fleets versus independent/artisanal fishers. The criteria will be launched in mid-May 2021. Key new criteria are:

- 1.05 The standard shall ensure the human rights policy and its implementation (including training and OHS measures) *shall reflect the size and structure of the entity, the type of vessel(s), its operations and level of risk.*
- 3.16 The standard shall require that workers *are entitled to timely repatriation* in the event that the worker's contract has expired or has been terminated for justified reasons or the worker is no longer able to carry out their duties. This applies to workers aboard the fishing vessel and those who are transferred for the same reasons to a foreign port. The standard shall require *the cost of repatriation not be borne by the worker* except where the worker has been in serious default of the terms and conditions of their work agreement.
- 3.02 The lead auditor performing audits for the audit firm shall have the following experience: a minimum of 1-year experience in social compliance auditing and a minimum of 100 social compliance audit days OR a minimum of two-year experience in any other type of auditing and 150 audit days of which a minimum of 50 are social compliance audit days. Other audit days may include management system, health and safety, labour inspections, investigations, audit components OR *a detailed combination of minimum relevant experience in social compliance, trainings, and social compliance audit days that are publicly available and consistent with standard industry practices and norms*

For discussion

- **Q. How many schemes do you think you will be assessing?**
A. Two already have shown interest today. We do not know the full extent yet and there has been some interest from generalist schemes as well. We will be driven by company demand. As a start we are preparing for three from early interest.
- **Q. Apart from the Food and Agriculture Organization (FAO), did you consult ILO for the standard?**
A. For clarification FAO only provided technical comments and feedback to the ASO criteria. ILO were one of the stakeholders, but not directly involved. We did talk to them about SSCI.
- **Q. How long will the benchmark process will take?**
A. We aim for six months but the process could take up to one year. The initial self-assessment takes two months. The programme needs to meet all of the criteria.
- **Q. Will the standard consider a vessel certified if it has de ILO C188 certification by the flag state?** **A.** This is up the standard owner and whether this needs alignment with C188, or it could use another interpretation.

Further information

- [SSCI-Recognised Schemes](#)
- **Details of the launch event will be circulated.**