



Human rights in farmed seafood supply chains

Seafood Ethics Common Language Group

1st February 2023



A world that embraces the role of responsible seafood in meeting global nutrition needs.

The Global Seafood Alliance (GSA) is an international non-governmental organization dedicated to promoting responsible seafood practices through education, advocacy and third-party assurances.

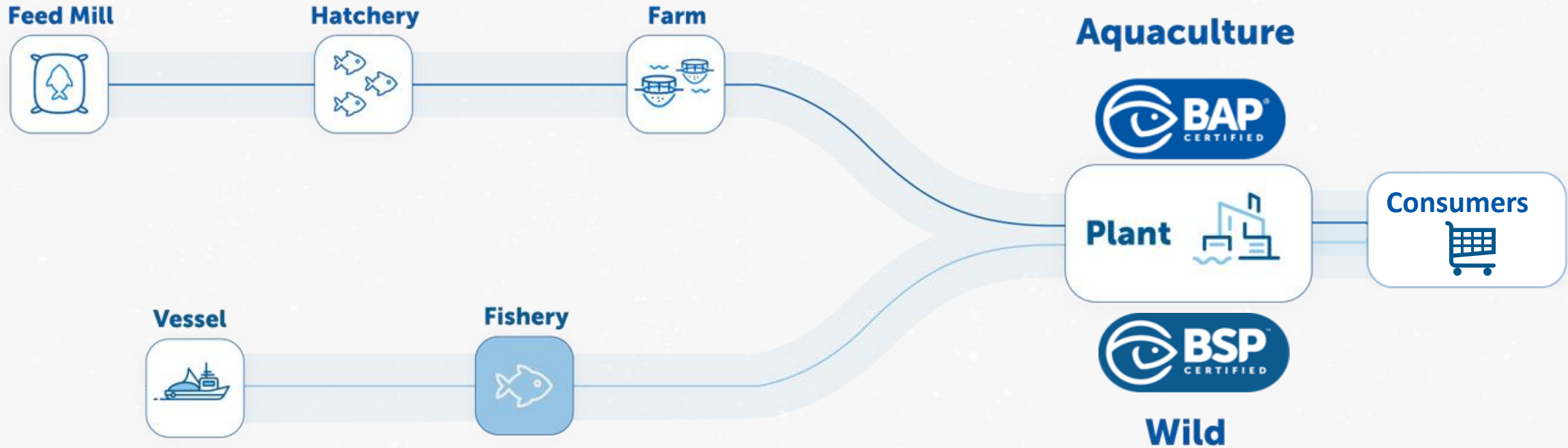
ORGANIZATION STRUCTURE



PROGRAMS OVERVIEW



GSA programs are the most comprehensive in the industry and cover the entire seafood supply chain.



KEY

- GSA owned standards
- GSSI benchmark schemed

Each star on the BAP logo represents a different part of the aquaculture production chain. A 4-star designation is the highest rating achievable.



1-Star Logo

Product produced by a BAP-certified processing plant



★ Processor
CERT # P12345

bapcertification.org



2-Star Logo

Product produced by a BAP-certified processing plant and BAP-certified farm(s) only



★ Processor
★ Farm
CERT # P12345

bapcertification.org



3-Star Logo

Product produced by a BAP-certified processing plant, BAP-certified farm(s) only and BAP-certified hatchery and/or feed only.



★ Processor
★ Farm
★ Feed

CERT # P12345

bapcertification.org



4-Star Logo

Product produced by a BAP-certified processing plant, BAP-certified farm(s) only, BAP-certified hatchery only and BAP-certified feed only.



★ Processor
★ Farm
★ Hatchery
★ Feed

CERT # P12345

bapcertification.org

THE PILLARS OF RESPONSIBILITY

Environmental Responsibility

Compliance with standards that address issues such as habitat conservation, water quality and effluents.

Social Accountability

Ensuring producers are following best practices in human rights, labor laws, and employee health and safety.

Food Safety

Assurance that no banned antibiotics or other chemicals are used and that all approved chemical treatments are carried out in a responsible fashion.

Animal Health & Welfare

Best practices in animal husbandry, addressing issues such as disease control.



SOCIAL ACCOUNTABILITY IN BAP STANDARDS

Dedicated to elevating human rights and working conditions in seafood

- **Underpinned by ILO Conventions and include requirements on:**
 - Wages and Benefits
 - Working Hours
 - Hiring and Terms of Employment
 - Employee Health and Safety
 - Staff Facilities
 - Personal Protective Equipment
 - Child Labor and Young Workers
 - Forced, Bonded, Indentured, Trafficked and Prison Labor
 - Discrimination, Discipline, Abuse and Harassment
 - Freedom of Association and Collective Bargaining



EXAMPLE CLAUSES FROM BAP FARM STANDARD



Discrimination, Discipline, Abuse and Harassment

- 2.36: The farm shall provide for equal opportunity with respect to recruitment, hiring, terms of employment, compensation, access to training, promotion, termination and retirement.
- 2.37: The farm shall not engage in or permit discrimination in any aspects of employment, including but not limited to recruitment, hiring, compensation, terms of employment, discipline, access to training, promotion, termination, or retirement on the basis of race, color, gender, national origin/ heritage, religion, age, nationality, social or ethnic origin, maternity, sexual orientation, political opinion, disability or any other status. There shall be no discrepancy in wages and benefits between men, women, ethnic or religious groups for equal qualifications, experience and/or responsibilities. Terms and conditions of employment shall be based upon the ability to do the job, not on personal characteristics or beliefs.
- 2.38: The farm shall treat workers with respect and not engage in or permit physical, verbal or sexual abuse, bullying or harassment.
- 2.39: The farm shall not terminate workers for pregnancy, subject workers to pregnancy or virginity testing, force the use of contraception, or reduce wages after maternity leave.
- 2.40: The farm shall have a written disciplinary procedure made available in appropriate language of the workers. Records shall be maintained of all disciplinary actions.
- 2.41: The farm shall have a written worker grievance process/procedure and make it available to all workers, that allows for the anonymous reporting of grievances to management without fear of retaliation.
- 2.42: The farm shall have in place an established complaints and remediation system to handle cases and allegations of sexual abuse/harassment, bullying, or discriminatory practices. This process shall, at a minimum, include a confidential reporting mechanism, information on any hotlines or other outside support services available and the possibility of calling in independent assessment/arbitration.
- 2.43: The farm shall have the information regarding hotlines, competent authorities, and other resources for victims of labor rights abuse displayed prominently for easy access to workers.

Freedom of Association and Collective Bargaining

- 2.44: Workers shall have the right to associate, organize, and bargain collectively (or refrain from doing so) without the need of prior authorization from management. Farms shall not interfere with, restrict, or prevent such activities and shall not discriminate against or retaliate against workers exercising their right to representation in accordance with international labor standards.
- 2.45: Where the right to freedom of association and collective bargaining is prohibited or restricted under local law, the farm shall not prevent alternative means to facilitate worker representation and negotiation (for example, the election of one or more workers by other workers to represent them to management).

Hiring and Terms of Employment

- 2.28: The farm shall only employ workers with a legal right to work in the country, whether national citizens or migrants. Work performed and terms of employment shall be in compliance with local, national law or international labor standards, whichever is stricter. Records shall be collected, verified and retained to document right to work documents.
- 2.29: The farm shall maintain all relevant documents that verify that any contracted/subcontracted workers, whether contracted through a labor service or otherwise, are paid in compliance with all local wage, hour and overtime laws.
- 2.30: The farm shall not use contractors, subcontractors, temporary workers, homeworkers, apprentices or other non-full-time employment schemes to avoid the payment of social security and other benefits required by local or national law under a regular employment relationship.
- 2.31: All labor recruiting agencies or employment services used by the farm must be licensed to operate by the local or national government as a labor provider. Workers shall not be subject to recruitment practices that utilizes threats, penalties, coercions, physical force, or fraud.
- 2.32: The farm shall provide to all workers, prior to hire and during employment, with written and understandable information regarding the terms and conditions of employment, worker's rights, benefits, compensation, expected working hours, details of wages for each pay period each time they are paid; and farm policies regarding disciplinary actions, grievance procedures, any authorized deductions from pay, physical work requirements, environment and housing, and workplace safety. This information shall be provided in the appropriate language of the employees. This requirement shall apply to all workers

Document ID: PI1-0107 Document Name: Farm Standard
Issue Number: 3.0 Effective Date: 01-March-2021

Page | 21

- regardless of status, including but not limited to hourly, salary, piece rate, temporary and seasonal workers.
- 2.33: Where contracted/subcontracted or temporary workers are hired through a labor recruiting agency, the farm shall ensure that these services provide the above information prior to and during hire, in appropriate languages, to ensure workers are aware of their rights and conditions of employment as described above.
- 2.34: The farm shall document the agencies used to recruit, hire, and/or employ workers, in addition to any known fees paid by or debts accrued by workers in order to secure employment.
- 2.35: If provided or mandated by the farm or employment agency/labor agency, worker housing shall meet local and/or national standards. Such housing conditions shall include at minimum, ensuring that structures are safe and watertight, that space is adequate as per occupational load for the buildings, and that heating/ventilation/cooling, pest control, sink, shower and toilet facilities are provided.

SOCIAL ACCOUNTABILITY IN BAP STANDARDS



Topic	Plants ⁸	FFC farms ⁹	Salmon farms ¹⁰
Child labour & young workers	3	3	3
Community Relations	0	3	7
Discrimination and abuse	4	2	2
Forced labour	4	4	4
Freedom of association and collective bargaining	4	2	2
Hiring & terms of employment	5	3	3
Medical care	4	1	1
Personal Protective Equipment and Clothing	3	1	1
Property Rights and Regulatory Compliance	6	3	6
Staff facilities	4	3	3
Training	4	0	0
Wages and benefits	6	5	6
Worker health and safety	10	8	11
Working hours	4	1	1
Total number of clauses (social and labour standards)	61	39	50

VANGUARD: ENHANCED SOCIAL ACCOUNTABILITY



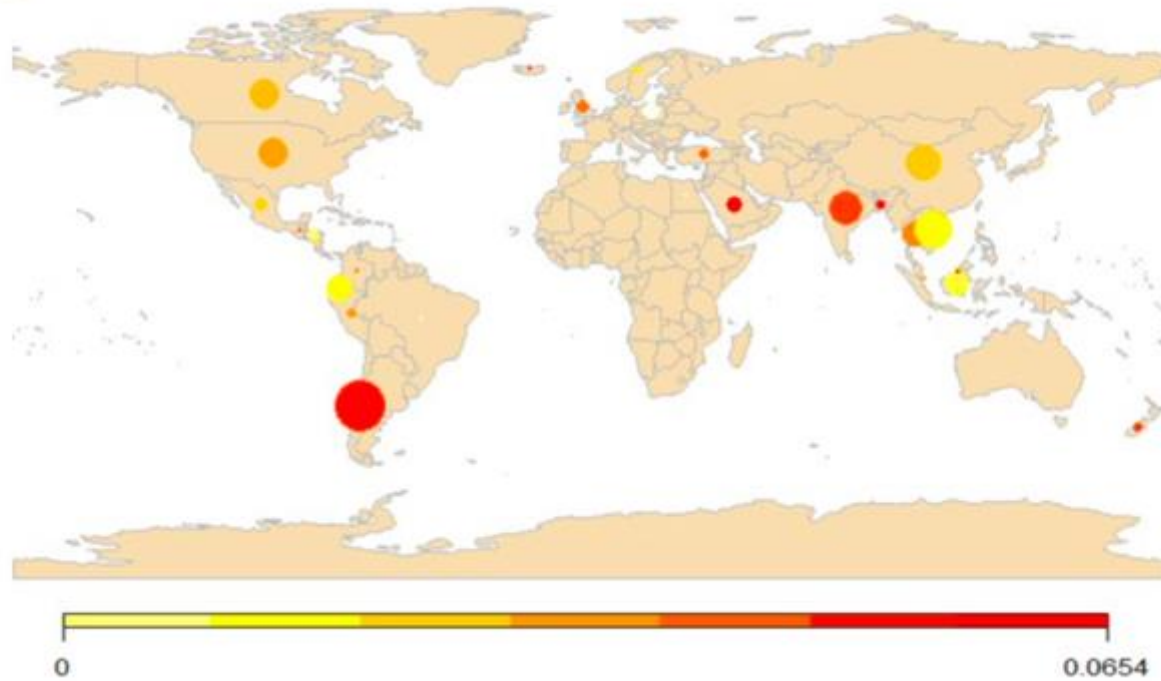
To improve the safety and wellbeing of employees in processing plants

- This optional audit helps to:
 - Differentiate supply chain with added assurances
 - Mitigate risk in areas of heightened concern
- Available to all processing plant applying to certify to SPS
- Current Social Accountability (SA) and Employee Health and Safety (EHS) requirements remain same but are enhanced in greater detail
 - Includes the addition of an APSCA Social Auditor
 - Allows more time for detailed worker interviews
- New guidance materials to CB's and auditors to improve consistency for regular audits
 - Standardized methodology establishes “indicators” of forced labor and human trafficking



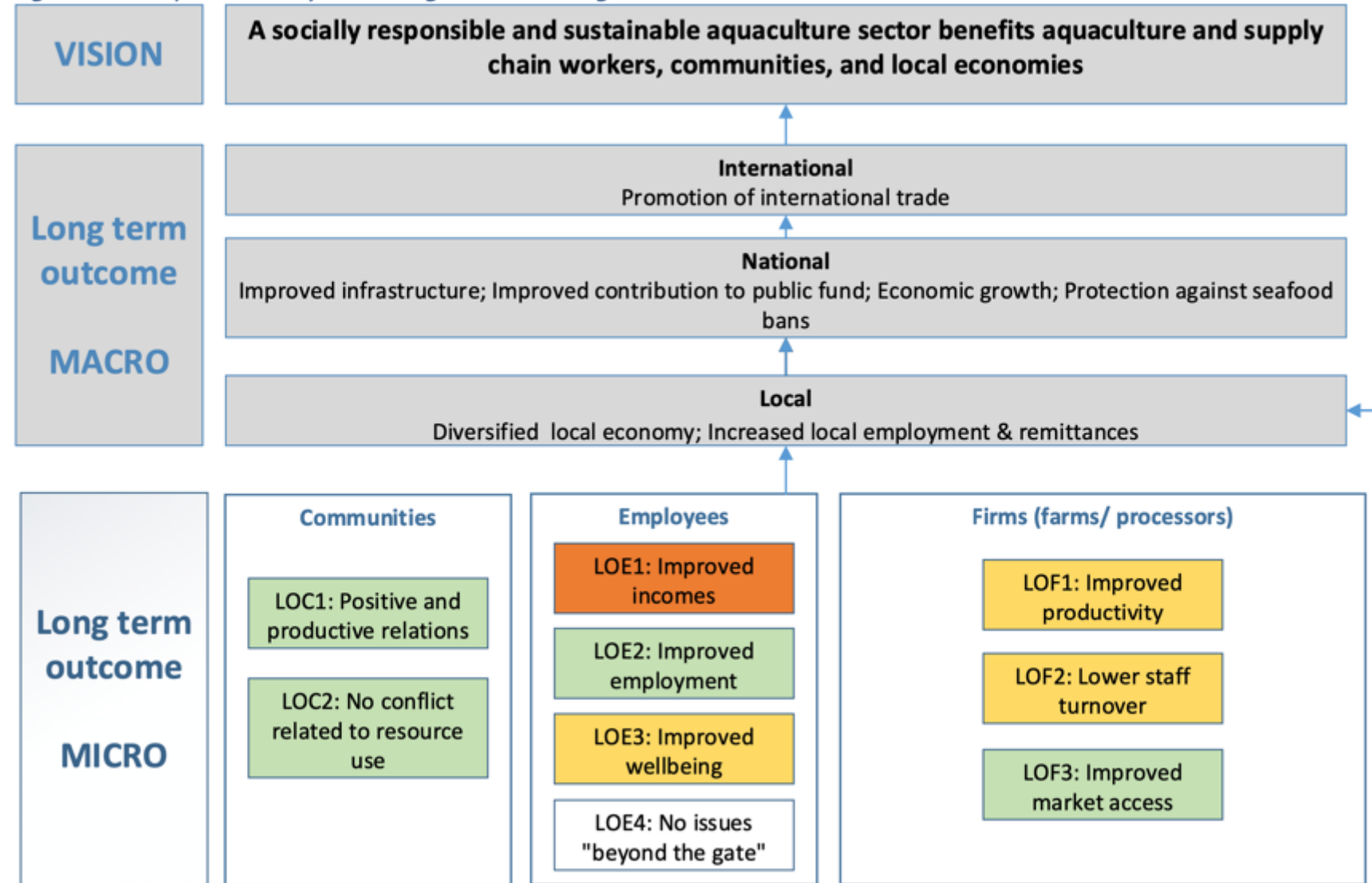
EVALUATING IMPACT

Figure 4. Rate of non-compliance seafood processing plants, size of bubbles indicates certified volumes



Assessment of social impact of GAA's 'Best Aquaculture Practices' certification

Figure 6. Adapted Theory of Change with scoring of indicators





Further investigate **role of gender in workplace discrimination** across the globe, focusing on promoting **equity** and treatment of marginalized groups



Assess how the concept of **living wage** could be supported by BAP/BSP certification in the future



Collaborate with NGO's, civil society, and worker organizations, including trade unions, to create solutions on **effective grievance and worker voice mechanisms**

GSA's Global Impact Report provides comprehensive insight into the advocacy, education and certification work GSA and our partners carry out around the world.

Giving vessel workers a voice

The Global Seafood Alliance believes "responsible" should address an additional pillar. Environmental, social, food safety and animal welfare are the original four, but the social aspect of wild-capture seafood has been overlooked until quite recently. Given the high level of migrant fish crew coupled with the invisibility of working at sea it is important that the sector addresses this important area in a robust way. GSA's Responsible Fishing Vessel Standard (RFVS) is an important step in that direction.

From 2018 to 2020, GSA led work to develop a world-class standard for the wellbeing of fishing vessel crews. The work involved global stakeholders and used conventions such as ILO188 as the base of the standard. Following the final public consultation, it became available for use in May 2020.

In developing the RFVS, some aspects of the global conventions were more difficult to develop into auditable indicators than others. One area of concern was ensuring crew have safe access to grievance mechanisms, and in turn that these mechanisms have meaningful and measurable resolution procedures. Furthermore, it was noted that on land such procedures, while often still challenging, are easier to implement and monitor.

In response, GSA documented work that explored options for these mechanisms on fishing vessels, including pilots and their outcomes. The results were made public in December 2020. A supplementary piece of work explored some aspects in greater detail. There was no consensus on what was generally appropriate or available for fishing vessel crews.

In late 2021, GSA began to determine expectations for worker voice and grievance mechanisms on certified fishing vessels. As new fishing vessel standards focused on crew welfare emerged, and as a benchmark for at-sea standards was reaching conclusion, retailers and NGOs were beginning to include the requirement of fishing vessel crew standards. The expectations for worker voice and grievance mechanisms could help determine where "better" and "worse" could be mapped to find pathways for improvement.

GSA is grateful to receive continued funding for this work from the David & Lucile Packard Foundation. GSA contracted Key Traceability to work on the project.

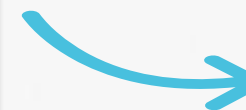
As of this June, the project team has a list of 60 bilateral interviews under way, of which some 32 have been completed. The aim is to engage different stakeholders globally, from recruiters to fishing vessel owners and from seafood buyers to NGOs. To help interrogate the outcomes and fill gaps of outreach or research there is an oversight committee supporting the project. Key Traceability and GSA have several in-person meetings planned that will bring groups of stakeholders together to further discuss the subject.

Bilateral interviews and in-person meetings will continue. The outcomes of these conversations will be summarized in a report toward the end of 2022 that will provide recommendations of what is possible and what can be expected on certified fishing vessels with immediate effect; it will also provide observations of how safe worker voice and grievance mechanisms for fishing vessel crew might be improved – both in terms of process and usage – in the near term. This report will be publicly available. The outcomes will guide the appropriate indicators in the Responsible Fishing Vessel Standard, with any changes being made through the GSA governance procedure.



Melanie Siggs

Director of Strategic Engagements





85 NEW HAMPSHIRE AVENUE
SUITE 200
PORTSMOUTH, NH 03801 USA

(603) 317-5000

INFO@GLOBALSEAFOOD.ORG

WWW.GLOBALSEAFOOD.ORG

WWW.BAPCERTIFICATION.ORG

WWW.BSPCERTIFICATION.ORG

