

FISHERYPROGRESS.ORG

# **HUMAN RIGHTS AND SOCIAL RESPONSIBILITY POLICY**

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# Introduction

Launched in 2016 by FishChoice, FisheryProgress is a one-stop shop for information on the progress of global fishery improvement projects (FIPs). Our mission is to provide seafood stakeholders with transparent and reliable information about how FIPs are making improvements. Today, 96% of FIPs worldwide use our platform to report their progress, and hundreds of companies rely on FisheryProgress for information about FIP performance, which empowers them to incentivize, invest in, and recognize social and environmental improvements. FIPs on FisheryProgress operate across diverse and complex contexts, including those with known labor and human rights risks.

The Human Rights and Social Responsibility (HRSR) Policy provides a framework for FIPs on FisheryProgress to integrate social responsibility into their FIP. The HRSR Policy is grounded in international best practices in social responsibility, including those outlined in Principle 15 of the [United Nations' Guiding Principles on Business and Human Rights \(UNGPs\)](#). The Policy guides FIPs through key steps, such as making a formal commitment to social responsibility, understanding the scope of vessels and fishers within the FIP, identifying whether the FIP operates in a high-risk context for forced labor and human trafficking, and conducting more robust assessments for understanding and addressing other potential risks.

<b>The United Nations Guiding Principles on Business and Human Rights (UNGPs)</b>
The <a href="#">UNGPs</a> are a set of guidelines for governments and companies to prevent, address, and remedy human rights abuses committed in business operations. UN Special Representative on Business and Human Rights John Ruggie proposed them, and the UN Human Rights Council endorsed them in June 2011. In the same resolution, the UN Human Rights Council established the UN Working Group on business and human rights.

FishChoice recognizes that each FIP's improvement journey is shaped by its unique risks, challenges, and stakeholder priorities. The HRSR Policy and the FisheryProgress reporting platform are designed to accommodate this diversity, empowering FIPs to develop tailored approaches that align with their specific contexts while upholding transparency and credibility. This flexibility supports an inclusive reporting platform and encourages broader participation.

*The objectives of the HRSR Policy are to assist FIPs in identifying and mitigating human rights and labor risks at the harvest stage of their supply chains and to enhance transparency around the actions FIPs and their participants have taken to address these risks. Central to the Policy's implementation is meaningful engagement with fishers, which not only supports progress in addressing social and labor challenges but can also accelerate broader FIP advancements in both social and environmental dimensions.*

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## History of the HRSR Policy

The first version of the HRSR Policy was published in May 2021. It was subsequently updated through an amendment in March 2022 and the publication of Version 1.1 in December 2022 in order to integrate learnings from the first year of implementation and to improve clarity and readability. The changes introduced in this document, Version 2.0 of the HRSR Policy, address the most significant feedback FishChoice has received about the Policy over the past few years. The changes, which are accompanied by new guidance documents, are intended to ease key implementation challenges for FIP implementers, offer greater flexibility and better guidance on the most demanding requirements, and enhance the overall credibility of FIP social reporting. The updated Policy also better highlights the ongoing nature of social engagement and continuous social improvement.

For a complete overview of changes made to the Policy, see the [Summary of Changes to the FisheryProgress HRSR Policy](#).

## Policy Revisions

FishChoice recognizes that industry norms evolve over time, and it is committed to maintaining requirements that fairly and equitably support FIPs and their stakeholders throughout their improvement journeys. Revisions to the HRSR Policy take into consideration learnings and feedback from implementing the current version of the Policy. FishChoice also periodically consults with FIP implementers, human rights and labor experts, industry, and other stakeholders to solicit input to and feedback on proposed changes to the Policy. More significant revisions to the Policy occur every three to five

years, and other smaller and more targeted revisions intended to improve clarity, eliminate ambiguities, or correct translations occur on an as-needed basis.

The next revision of the Policy will be informed by findings from the Causal Design HRSR Monitoring and Evaluation project, which is scheduled to be completed by the end of 2025, after which FishChoice will share findings with the FIP community.

FishChoice always welcomes feedback via [this form](#).

## Understanding Social Responsibility Information on FisheryProgress

FisheryProgress is a platform designed to make FIP improvement data transparent and accessible, enabling supply chain actors to incorporate this information into their broader human rights due diligence efforts. While compliance with the HRSR Policy does not guarantee that FIPs are free from human rights abuses or replace a comprehensive due diligence process, the data provided offers critical insights for informed decision-making.

### Types of Data Available

- **Comprehensive Risk Assessments:** Findings from assessments undertaken to identify risks such as forced labor, human trafficking, debt bondage, and child labor, including those completed using the Social Responsibility Assessment (SRA) Tool
- **Social Workplans and Progress Updates:** Documentation of strategies and actions taken to address identified social risks, supported by evidence
- **Grievance Mechanism Insights:** Reports on fishers' access — or gaps in access — to grievance mechanisms and appraisals of their effectiveness
- **Evidence of Awareness of Rights Efforts:** Documentation of activities aimed at raising fisher awareness about their rights

### Reliability and Verification

FishChoice reviews all submitted data to ensure it meets FisheryProgress' requirements, but it does not verify the on-the-ground conditions or guarantee the absence of human and labor rights violations. Instead, FisheryProgress equips users with actionable information to incorporate into their own due diligence strategies, fostering more robust and context-specific decision-making.

## Practical Decision-Making for Users

FisheryProgress caters to a diverse range of stakeholders, each of whom can leverage the site's data to address unique challenges and goals:

- **Fishing Companies/Producers:** Use the platform to highlight progress, address compliance gaps, and reinforce commitments to social and environmental responsibility.
- **Mid-Supply Chain Buyers:** Analyze performance and risk data to maintain, adjust, or deepen supplier relationships based on alignment with company standards.
- **Brands and Retailers:** Access transparent information to align sourcing practices with corporate social responsibility goals and make informed decisions about supplier engagement or corrective actions.

## Supporting Continuous Improvement

FishChoice encourages users to foster a culture of accountability by rewarding transparency and continuous improvement. This approach is particularly impactful in high-risk contexts, where addressing systemic issues often require sustained effort and collaboration.

### Best practices include:

- **Supporting Progress:** Continue sourcing from FIPs that demonstrate measurable improvement and align with company standards, incentivizing ongoing transparency and action.
- **Mitigating Risk:** Partner with FIPs that openly acknowledge challenges and take strategic steps to address them. Rewarding effort and progress is more effective than expecting immediate perfection.
- **Investing Strategically:** Allocate resources to FIPs actively tackling labor and human rights issues, particularly in high-risk fisheries, to drive long-term, systemic change.

## A Note About Progress Ratings

FIP ratings on FisheryProgress profiles do not evaluate progress — or lack thereof — in addressing labor and human rights issues or broader social responsibility efforts. To form a comprehensive understanding of a FIP's performance and alignment with standards, users should evaluate social responsibility data alongside environmental metrics.

# Overview

The HRSR Policy provides a structured framework for FIPs reporting on FisheryProgress. It is divided into three components:

1. **Requirements for All FIPs:** Baseline requirements applicable to every FIP reporting on FisheryProgress
2. **Additional Requirements for High-Risk FIPs:** Specific obligations for FIPs identified as operating in high-risk contexts for forced labor and human trafficking
3. **Voluntary Reporting:** Optional opportunities for FIPs to go beyond the minimum requirements by reporting on additional social improvement metrics

## Key Terms:

- **“Shall,” “must,” and “required”:** Indicate mandatory requirements for remaining listed on FisheryProgress.
- **“Should,” “may,” and “best practice”:** Indicate recommended actions.
- **“Met” or “in good standing”:** The FIP has submitted documentation demonstrating full alignment with the requirement.
- **“Working toward”:** The FIP is actively progressing toward meeting the requirement.<sup>1</sup>

Even when requirements are considered “met,” continuous effort is expected. Requirements are part of an ongoing process of improvement rather than one-time actions.

<b><u>Component 1</u></b> <b>Requirements for all FIPs</b>	<b>All FIPs reporting on FisheryProgress must:</b> 1.1 Publish a Policy Statement that outlines the FIP’s public commitment to human rights and social responsibility. 1.2 Provide information about the vessels and/or fishers harvesting or transporting FIP product. 1.3 Undertake best efforts to raise fishers’ awareness of their rights. <sup>2</sup>
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<sup>1</sup> The “working toward” option for reporting is only available for Requirements 1.3 and 1.4.

<sup>2</sup> FIPs that have completed and published an SRA and corresponding social workplan may opt to report their Fisher Awareness of Rights activities as social workplan actions. Similarly, FIPs with a published SRA and workplan may opt to report their findings related to grievance mechanisms via their SRA as well as actions being taken to address any gaps identified through their social workplan actions.

	<p>1.4 Assess the availability and effectiveness of systems in place for fishers to raise and resolve issues, such as grievance mechanisms.<sup>3</sup></p> <p>1.5 Complete a self-evaluation to determine whether the FIP is operating in a high-risk context for forced labor or human trafficking.</p>
<p><b><u>Component 2</u></b></p> <p><b>Additional Requirements for FIPs that Meet the Risk Criteria</b></p>	<p><b>FIPs that meet one or more FisheryProgress criteria for increased risk of forced labor and human trafficking (see Requirement 1.5) must:</b></p> <p>2.1 Complete a comprehensive risk assessment using the SRA Tool or an alternative method that meets HRSR Policy requirements.</p> <p>2.2 Create and report on a social workplan based on risk assessment findings.</p>
<p><b><u>Component 3</u></b></p> <p><b>Requirements for Voluntary Reporting</b></p>	<p><b>Any FIP on FisheryProgress may choose to exceed the requirements outlined in Components 1 and 2.</b></p> <p>Requirement 3.1 details reporting requirements for FIPs that opt to voluntarily report on risks, workplan actions, and/or progress beyond what is mandated under the Policy.</p>

## Applicability and Scope

All active FIPs on FisheryProgress must meet the requirements detailed in this HRSR Policy as a condition of use of FisheryProgress.

The scope of this HRSR Policy is designed to align with FIPs' scope or unit (i.e., Unit of the FIP), which focuses on interventions and activities aimed at improving a fishery. Although FIPs can impact an entire fishery, the HRSR Policy is focused on the fisher/vessel level (i.e., entities harvesting and transporting<sup>4</sup> FIP products). Whether all seafood products harvested from the fishery are considered to be FIP products depends on the FIP participants and varies from FIP to FIP.

<sup>3</sup> Ibid.

<sup>4</sup> This policy applies to any vessel transporting FIP products, such as a transshipment vessel. It does not apply to any on-land transport of seafood.



The applicability of each requirement is provided in the Requirement Details section of each requirement below. The responsibilities and interventions that requirements entail are aimed at addressing human and labor rights risks present during the harvest stage of the FIP's supply chain(s), including all fishing activity within a FIP's supply chain(s); whether conducted from shore, a vessel, or elsewhere; as well as transshipment activity.

The language in this HRSR Policy is gender neutral and intended to encompass people of all genders.

### **Definitions**

FIP product: Seafood product(s) harvested from a FIP's target fishery and sold either directly or indirectly to FIP supply chain participants. FIP product includes all seafood product(s) caught and sold within the Unit of the FIP — i.e., products landed from vessels/fishers recorded on the vessel/fisher list and sold to supply chain actors identified as FIP lead(s) and/or FIP participants.

FIP participant: Any entity that actively participates in a FIP by contributing financial or in-kind support to the project and/or working on activities in the workplan. FIPs are required to have active participation by companies in the supply chain. Other important participants include government, fishery managers, and nongovernmental organizations.

Fisher: Any person of any age or gender employed or engaged in the capture or gathering of seafood, either from shore or from a fishing vessel. Fishers also include persons employed or engaged in any capacity or carrying out an occupation on board any fishing vessel, including persons working on board who are paid on the basis of a share of the catch but excluding pilots, naval personnel, other persons in the permanent service of a government, shore-based persons carrying out work aboard a fishing vessel, and fisheries observers.

Unit of the FIP: The specific scope and boundary of a FIP, including target stocks, fishing gear types, participating vessels, and supply chain actors identified as FIP lead(s) and participants.

Vessel: A vehicle, including a transshipment vessel, used to catch or transport fish or fishers. All vessels fishing or transporting catch within a FIP are included in the scope of this HRSR Policy regardless of whether they are formal participants in the FIP.

## Implementation Responsibility

FIPs were created with the understanding that a variety of stakeholders must support each other to improve performance and to monitor and enforce changes in behavior in the supply chain. That means that all FIP participants can play a role in ensuring that human rights are respected. Nevertheless, just as the roles and responsibilities for environmental sustainability improvements vary from FIP to FIP, so too will the roles and responsibilities for social improvements. FishChoice encourages FIP participants to have proactive conversations to review the requirements detailed in this HRSR Policy and designate clear implementation roles and responsibilities.

Regardless of who ultimately implements the requirements, the parties **typically responsible for environmental reporting on FisheryProgress are also responsible for reporting on the implementation of this HRSR Policy**. FishChoice encourages FIPs to consider partnering with or hiring social experts to support social progress reporting and implementation of HRSR Policy requirements.

## Review Process

FIPs provide updated data every six months. FishChoice reviews the information that FIPs submit to determine whether the submitted information effectively meets the site's requirements before publication, which are outlined in the FisheryProgress [FIP Review Guidelines](#). The site's [Technical Committee](#) conducts spot-checks to ensure reviews are consistent and standardized.

Any concerns related to decisions that FishChoice makes or procedural issues related to the requirements outlined in this HRSR Policy are handled through the FisheryProgress dispute resolution and appeals process. You can read more about the process and the criteria for accepted appeals on [FisheryProgress](#).

## Reporting Timelines

Regular reporting provides FIPs with the opportunity to communicate their progress, as well as share learnings and challenges, to stakeholders and engage them to support further improvements. It also ensures that FisheryProgress users have access to timely and transparent information for determining whether a FIP satisfies its social responsibility commitments.

Table 1 details both the initial and progress reporting timelines for each requirement. **Note that specific timelines for FIPs to meet reporting requirements vary according to their unique reporting cycle, which is based on when each FIP is first listed as active on FisheryProgress.** The document submission and review process occurs as part of a FIP's regular six-month and annual reporting.

**Table 1: Initial and Progress Reporting Timelines**

Policy Requirement		Initial Reporting	Progress Reporting
<b>1.1</b>	Policy Statement	To be listed as active	Every annual report
<b>1.2</b>	Vessel and/or fisher info	To be listed as active	Every annual report
<b>1.3</b>	Fisher awareness of rights	First annual report <sup>5</sup>	Every annual report, or every six months if working toward the requirement
<b>1.4</b>	Grievance mechanism	First annual report <sup>6</sup>	Every annual report, or every six months if working toward the requirement
<b>1.5</b>	Self-evaluation of risk criteria	To be listed as active	Every annual report
<b>2.1</b>	Risk assessment (if required) <sup>7</sup>	First annual report, if one or more risk criteria were met (see Requirement 1.5) <sup>8</sup>	Every three years, or more frequently if desired
<b>2.2</b>	Social workplan (if required) <sup>9</sup>	First annual report or six months after the	Every six months

<sup>5</sup> FIPs that conduct a risk assessment using the SRA Tool may report against this requirement under Component 2.

<sup>6</sup> Ibid.

<sup>7</sup> FIPs that meet one or more of the criteria for increased risk of forced labor and human trafficking (see Requirement 1.5) must comply with Requirement 2.1.

<sup>8</sup> If at any point a FIP's answers to the self-evaluation change and the FIP meets the risk criteria, a risk assessment (Requirement 2.1) is due 12 months later.

<sup>9</sup> FIPs must develop a workplan to address all indicators that scored as high risk in an SRA. FIPs that submit an alternative assessment must also provide an associated workplan or corrective action plan.

		submission of a risk assessment <sup>10</sup>	
<b>3.1</b>	Reporting on voluntary risk assessments and workplans	At any time	See requirement section for details

Focus and content of reporting varies between Initial Reporting and Progress Reporting as follows:

- **Initial reporting:** FIPs submit documentation to demonstrate how they have met the requirement (or for Requirements 1.3 and 1.4, demonstrate work toward meeting the requirement).
- **Progress reporting:** FIPs submit documentation to report on any steps taken, changes, or progress made since the previous reporting cycle.

## Reasons for a FIP to be Marked as Inactive

FIPs must meet the initial reporting timelines for the requirements of the HRSR Policy to retain active status on FisheryProgress. FIPs must also meet the requirements outlined in the HRSR Policy during their regular six-month and annual progress reports. If the FIP does not meet the requirements as outlined, FishChoice will consider the report not completed and will mark the FIP's report as missed. Two consecutive missed reports (including a report a FIP missed and then submitted later) will render the FIP inactive. Additional detail on completed and missed reports, going inactive, and how to reactivate an inactive FIP is included in the [FIP Review Guidelines](#).

## Addressing Concerns About FIP Information on FisheryProgress

FishChoice is committed to supporting accuracy and transparency in the data and information it publishes. Stakeholders with concerns about the accuracy or integrity of FIP information are encouraged to use FisheryProgress's Dispute Resolution and Appeals Process, as outlined in the [Processes for Addressing Concerns About FIP Information on FisheryProgress](#) document. This process provides a framework for:

<sup>10</sup> Once a FIP reports meeting one or more criteria for increased risk of forced labor and human trafficking, it has up to 18 months to complete the social workplan. Note that this is six months *after* the completion of the risk assessment (Requirement 2.1). FIPs are welcome and encouraged to submit their workplan actions at the same time as their risk assessment.

- Reviewing reported incidents of forced labor, human trafficking, or child labor
- Resolving disputes and managing appeals related to published FIP data

This process ensures stakeholders have an opportunity to challenge inaccuracies. If concerns are validated, FIPs will be required to ensure their profiles are updated to correct inaccuracies. By engaging with this system, stakeholders help promote accountability, foster continuous improvement, and contribute to enhanced social and environmental outcomes.

It is important to note that this process focuses solely on ensuring FIPs meet FisheryProgress's reporting requirements and that published information is accurate. It is not a substitute for legally binding mechanisms that address on-the-ground mitigation and remediation efforts.

## Reporting Transparency

All documentation that FIPs provide to meet this HRSR Policy's requirements is published to the FIP's profile on FisheryProgress. That transparency ensures that FisheryProgress users have the information they need to conduct their own due diligence. It also serves as an added layer of oversight to reinforce the accuracy and credibility of FIP information.

Information submitted as part of a FIP's report must not be confidential. It is the FIP's responsibility to ensure it takes proper measures to that end. FishChoice strongly encourages FIP leads to obtain consent for publishing information in advance of submission to FisheryProgress. FIPs that have legal or security concerns about sharing information in the public domain may request that required reporting information remain unpublished, though FishChoice will maintain documentation internally for review purposes. FIPs must support those requests with justification, and FishChoice will review and approve them on a case-by-case basis.

# Component 1: Requirements for All FIPs

## 1.1 Demonstrate There Is a Public Policy Statement Outlining a Commitment to Human Rights and Social Responsibility

### 1.1.1 REQUIREMENT DETAILS

FishChoice expects all FIPs reporting on FisheryProgress to share our commitment to reduce the risk of human and labor rights abuses in FIPs. FIPs demonstrate that commitment by providing a public policy statement (“Policy Statement”) that expresses their responsibilities, commitments, and/or expectations regarding human rights and social responsibility.

To meet that requirement, FIPs must complete and submit all required information in the Policy Statement section of their FisheryProgress profile, including one or more Policy Statement(s) as well as corresponding information (e.g., endorsement, effective date, implementation procedures and practices, etc.). The FIP is responsible for ensuring each Policy Statement meets the required criteria below.

Definitions
<p><u>FIP Lead</u>: The individual or organization designated as the main point of contact for the FIP for FisheryProgress. Users may contact the FIP lead with questions about the FIP or to learn more about engaging with and/or sourcing from the FIP.</p> <p><u>FIP supply chain participants</u>: FIP participants that buy or sell FIP products. They include both companies and their representatives.</p> <p><u>Policy Statement</u>: A documented agreement that a FIP and/or its participants employ to publicly disclose responsibilities, commitments, and/or expectations regarding, at a minimum, human rights and social responsibility. The Policy Statement may come in the form of a code of conduct, commitment, policy, guidelines standards, or other document.</p>

The Policy Statement(s) must meet the following criteria:

- Apply to all vessels and fishers fishing, whether on land or on a vessel, as well as those engaged in transport/transshipment of FIP product at sea.

- Address the following categories — corresponding to SRA Tool indicators<sup>11</sup> — as applicable to the vessels and fishers in the FIP<sup>12</sup>:
  - Abuse and harassment (SRA1.1.1)
  - Forced labor (SRA1.1.2)
  - Human trafficking and fair recruitment (SRA1.1.3)
  - Debt bondage in small-scale fisheries or smallholder farms (SRA1.1.4)
  - Child labor (SRA1.1.5)
  - Freedom of association and collective bargaining (SRA1.1.6)
  - Earnings and benefits (SRA1.1.7)
  - Adequate rest (SRA1.1.8)
  - Access to basic services for worker housing/live-aboard vessels (SRA1.1.9a)
  - Access to basic services for small-scale fishing or smallholder farming communities (SRA1.1.9b)
  - Occupational safety (SRA1.1.10)
  - Medical response (SRA1.1.11)
  - Observer rights (SRA1.1.12)
  - Customary rights (SRA1.2.1)
  - Grievance reporting and access to remedy (SRA2.1.1)
  - Discrimination (SRA2.2.2)
  
- Be endorsed by the relevant party or parties in the FIP. At a minimum, this means one or more<sup>13</sup> of the following:
  - The FIP lead(s)<sup>14</sup> signs a Policy Statement on behalf of the FIP supply chain participants.
  - Each FIP supply chain participant signs a Policy Statement.
  - Each FIP supply chain participant has a Policy Statement published on its company's website.
  
- Be active throughout the time the FIP is active on FisheryProgress.
  
- Be shared with all FIP participants in the language(s) they understand.

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<sup>11</sup> SRA indicator numbers correspond to SRA version 2, published in 2025.

<sup>12</sup> These categories (corresponding to SRA indicators) are designed to accommodate a range of fisheries and contexts. That means that not all categories are applicable to all FIPs. For additional guidance on determining which categories are applicable, please refer to the Scoring Guidance table in the [Social Responsibility Assessment Tool for the Seafood Sector](#).

<sup>13</sup> A FIP may choose to implement a combination of these options.

<sup>14</sup> In cases where a FIP has multiple FIP leads, only one FIP lead is required to sign.

Each FIP must compile and summarize key information about its Policy Statement(s) in the Policy Statement section of its FisheryProgress profile. Specifically, it must provide the following information about the FIP's Policy Statement(s):

- A brief description of the Policy Statement(s) and whom the statement(s) apply to, including the applicability of each Policy Statement and the party or parties in the FIP that endorse each Policy Statement
- A description of the policies, procedures, practices, and systems in place to ensure that the responsibilities, commitments, and/or expectations outlined in the statement(s) are implemented and upheld
- An affirmation from the FIP that it has verified that the Policy Statement(s) meet all the required criteria

### Applicability and Scope

All active FIPs on FisheryProgress must meet this requirement.

### Initial Reporting

FIPs must meet this requirement to be listed as active on FisheryProgress.

### Progress Reporting

FIPs must confirm during their annual report that the information they provided remains current and meets the requirement details above. Any changes to the FIP, including but not limited to changes to the FIP lead and/or FIP supply chain participants, may trigger the need for the FIP to submit an updated Policy Statement(s) and corresponding information.

## 1.1.2 RATIONALE AND ADDITIONAL INFORMATION

Publishing a Policy Statement is an effective way for a FIP to communicate its commitment to prioritizing human rights and social responsibility to fishers and other stakeholders. As a basic tenant of the [UNGPs](#), a public statement enhances both internal and external accountability. It also serves as a foundational step in a company's human rights due diligence process, signaling a formal commitment to respect and uphold human rights.

FIPs come in a variety of shapes and sizes. This requirement is designed to accommodate that diversity by allowing FIP leads and participants to determine the best model for



outlining their commitment to human rights and social responsibility. Some FIPs may choose to meet this requirement by providing a single Policy Statement, such as the one described in the Best Practices box (“Developing a Policy Statement”). Other FIPs may choose to meet this requirement by sharing, for example, the codes of conduct that their supply chain participants have already adopted. Allowing FIPs to design their own Policy Statements increases their sense of ownership and accountability and creates flexibility to ensure their approach reflects their unique contexts. Regardless of who endorses the Policy Statement, all FIP participants have a moral and legal responsibility to ensure that human rights are respected.

### Consulting Stakeholders About the Policy Statement

FIPs are strongly encouraged to consult with all relevant stakeholders, especially and importantly fishers and their representatives, as they design their Policy Statements. Once they have finalized their Policy Statement(s), it is important for FIPs to effectively communicate expectations and commitments to all relevant parties. For example, FIPs can and should include the Policy Statement in partnership, financing, and purchasing contracts among FIP participants and their supply chain partners, including any Memorandum of Understanding that FIP participants have signed.

### Developing a Policy Statement

The FIP model is based on the idea that a variety of stakeholders must support each other to improve performance and to monitor and enforce behavior changes in the supply chain. To demonstrate that the FIP’s sense of collective action and shared responsibility apply to not only environmental sustainability but also social responsibility, **FishChoice strongly encourages all FIP participants to commit to a single collective Policy Statement.**

Actions taken to uphold the Policy Statement may vary for different types of FIP participants and stakeholders. For example:

- Retailer/brand participants can establish, communicate, and enforce expectations and provide financial and/or technical support to vessels and fishers.
- Processor participants can reinforce commitments and expectations through their sourcing decisions.
- Producer participants can improve their company’s management, policies, and procedures and engage with worker representatives.
- Trade and industry organization participants can set goals and increase accountability of member companies.
- Conservation nongovernmental organization (NGO) participants can leverage their

insights to highlight potential risks and ensure their own work takes a “do no harm” approach.

- Socioeconomic, labor, and human rights NGO participants can provide expertise in assessing risks and designing improvements that are tailored to the local context.
- Academic participants can work to understand the risks and identify best practices to mitigate risk.
- All FIP participants can lobby Regional Fisheries Management Organizations (RFMOs), as well as relevant governments and vessel flag states to improve legal, regulatory, and enforcement frameworks to meet international standards.
- Government participants can identify legal, regulatory, and enforcement shortcomings and work to improve them.

FIPs wishing to adopt this approach are encouraged to use the FisheryProgress model Policy Statement<sup>15</sup> to meet Requirement 1.1.

## 1.2 Provide Information About the Vessels and/or Fishers Harvesting and Transporting the FIP Product

### 1.2.1 REQUIREMENT DETAILS

FIPs must provide information about the vessels and/or fishers harvesting or transporting FIP product by completing all required fields in the Vessel List section of their FisheryProgress profile.

The information FIPs must provide to comply with this requirement is differentiated based on the type of fishing activity in the FIPs, as detailed below. FIPs that have a mix of types must meet the relevant requirements for each type, as described below.

#### FIPs With Vessels

FIPs harvesting or transporting FIP products using vessels must provide information about all vessels involved in the catch and transport of FIP product, even if vessel owners are not formal participants in the FIP.

#### Large Vessels and Vessels of Any Size Fishing Outside Their Exclusive Economic Zone (EEZ)

FIPs with large vessels and/or vessels of any size fishing outside of their country's EEZ must compile a list of such vessels that includes the following information:

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<sup>15</sup> The model Policy Statement can be found in the templates section of the user dashboard.

1. For each vessel:
  - a. Vessel name
  - b. Vessel size category
  - c. Vessel length (optional)
  - d. Vessel/gear type
  - e. Name(s) of the owner(s)
  - f. Name(s) of the operator(s) (if different from the owner)
  - g. Flag
  - h. Unique Vessel Identifier (UVI), where applicable; otherwise, alternative identification number(s) such as a National Registration Number or Maritime Mobile Service Identity (MMSI)
2. Information on how the FIP collected the vessel information (i.e., sources)
3. The date the FIP compiled the information
4. The FIP lead's confirmation that they have undertaken best efforts to ensure that the information provided is complete and accurate

With regard to vessel identification numbers, FIPs must provide UVIs for all vessels that have a UVI. FIPs may also provide additional identification numbers for those vessels and are encouraged to include an MMSI where one exists. For vessels that do not have a UVI, FIPs must provide one or more alternative identification number alongside information on what type of identifier it is. Additionally, FishChoice strongly recommends that, where feasible, FIPs share information to help FishChoice better understand the barriers and reasons that currently prevent or discourage vessels that are eligible for a UVI from getting one.

### **Definitions<sup>16</sup>**

Large vessels: Those that weigh 10 GT or more or measure 12 m or longer.

Small vessels: Those that weigh less than 10 gross tons (GT) and are shorter than 12 meters (m).

Unique Vessel Identifier: A global unique number that is assigned to a vessel to ensure traceability through reliable, verified, and permanent identification of the vessel.

FisheryProgress accepts the following UVIs: International Maritime Organisation (IMO)

<sup>16</sup> Additional relevant terms and definitions for completing the vessel list can be found in the [FisheryProgress glossary](#).

number, Tuna Unique Vessel Identifier (TUVI), and the International Seafood Sustainability Foundation UVI (ISSF-UVI).

Vessel operator: The individual or legal entity that has assumed the responsibility for the operation of the vessel from the owner and who, on assuming such responsibility, has agreed to take over the duties and responsibilities imposed on owners. The vessel operator may be the vessel owner, the captain, skipper, manager, agent, or bareboat charter.

Vessel owner: The vessel may be owned by one or several entities, including legal owners and/or beneficial owners who own or control the legal owner.

### Small Vessels

FIPs with small vessels must provide:

1. Information on all vessels in the FIP in one of two forms:
  - a. A description of the fleet that includes:
    - i. The number of vessels
    - ii. Landing sites for the catch
    - iii. Fishers' home communities
    - iv. Gear type(s)OR
  - b. A list of vessels including the following:
    - i. Vessel name
    - ii. Vessel size category
    - iii. Vessel length (optional)
    - iv. Vessel/gear type
    - v. Name(s) of the owner(s)
    - vi. Name(s) of the operator(s) (if different from the owner)
    - vii. Flag (if applicable)
    - viii. Landing site
    - ix. National Registration Number and optionally an additional identification number such as a MMSI
2. Information on how the FIP collected the information (i.e., sources)
3. The date the FIP compiled the information
4. The FIP lead's confirmation that they have undertaken best efforts to ensure that the information provided is complete and accurate

<b>Vessel lists for small vessels</b>
Although FIPs with small vessels are not required to provide a vessel list, FishChoice strongly encourages them to do so.

### FIPs Without Vessels

FIPs harvesting FIP products without vessels, such as land-based fishing or intertidal harvesting, must provide information about the fishers.

FIPs with fishers harvesting FIP product without vessels must provide:

1. A description of the fishers that includes:
  - a. Approximate number of fishers
  - b. Landing sites for the catch
  - c. Fishers' home communities
  - d. Type of fishing practice
2. Information on how the FIP collected the fisher information (i.e., sources)
3. The date the FIP compiled the information
4. The FIP lead's confirmation that they have undertaken best efforts to ensure that the information provided is complete and accurate

### Applicability and Scope

All active FIPs on FisheryProgress must meet this requirement. FIPs that have a combination of types of fishing activity must report on all types included in the FIP.

### Initial Reporting

FIPs must meet this requirement to be listed as active on FisheryProgress.

### Progress Reporting

FIPs must update their vessel and/or fisher information at least once per year as part of their annual report.

## 1.2.2 RATIONALE AND ADDITIONAL INFORMATION

Understanding which vessels and fishers are involved in the harvesting and transshipment of FIP products is a foundational step toward strengthening human rights due diligence, enhancing transparency, and fostering shared accountability across the supply chain to maximize improvement efforts. These stakeholders play a pivotal role in achieving the FIP's

goals, whether related to social or environmental responsibility. Understanding this stakeholder landscape enables FIPs to implement the HRSR Policy's requirements effectively while enhancing transparency, accountability, and the capacity to monitor progress. It also ensures that remediation efforts are directed at those with the power to effect change.

The Policy requires the publishing of different types of information depending on whether a FIP includes vessels and, if so, the type and size of those vessels. In FIPs with vessels, it is crucial to identify who owns (and financially benefits from) the vessels as well as who operates them at sea. This information is key to determining who holds ultimate responsibility for working conditions, trainings, and on-board risks.

Tailoring the requirements by fishing type and vessel size also reflects the varied information-tracking systems and organizational structures available to different fisheries, particularly small-scale operations. This differentiated approach ensures that the vessel and fisher information collected is accessible, accurate, and contextually relevant, supporting effective accountability and improvement efforts across diverse FIP settings.

## **1.3 Undertake Best Efforts to Make Fishers Aware of Their Rights**

### **1.3.1 REQUIREMENT DETAILS**

FIPs must undertake best efforts to make fishers aware of their rights, including at a minimum:

- The commitments and responsibilities outlined in the FIP's Policy Statement(s) (see [Requirement 1.1](#))
- The availability of grievance mechanisms and how to use them

To meet this requirement initially, FIPs must submit all information requested in the Fisher Awareness of Rights section of their FisheryProgress profile and provide evidence to support the actions described. Required information includes:

- A list of actions undertaken, planned, or currently underway, including the approximate time frame in which they occurred or are planning to occur
- Evidence to support the listed action(s)
- Confirmation that the action(s) undertaken were designed to reach all fishers involved in the catch or transport of FIP product

- Confirmation that the action(s) were completed in a language fishers understand and that accommodations were made for illiterate fishers

It is recommended that awareness-raising activities also incorporate information about fishers' rights and protections granted by applicable laws and regulations, including ratified international instruments and local legal frameworks.

In practice, these efforts are ongoing. FIPs must ensure that up-to-date information is available to fishers throughout the time when the FIP is active on FisheryProgress.

### Supporting Fishers' Awareness of Rights

There are multiple effective approaches to making fishers aware of their rights, including but not limited to posting notices on vessels and at ports, providing training, and/or including information on the FIP Policy Statement and grievance mechanism in hiring materials such as crew contracts and employee manuals. Fisher trade unions and other worker representatives are best positioned to help FIPs and their participants to meaningfully empower fishers to report any violations of their rights through grievance mechanisms.

Making fishers aware of their rights is not any one stakeholder's sole responsibility. Rather, it is a collective effort in effective communication that is supported through regular messaging from multiple sources.

### Applicability and Scope

This requirement applies to all active FIPs on FisheryProgress. FIPs must design the actions they undertake to meet this requirement to reach all fishers in the FIP's scope or unit (i.e., Unit of the FIP). That includes all fishers harvesting and transshipping FIP products, regardless of whether the fishers and their employers are formal FIP participants.

### Initial Reporting

During their first annual report after being listed as active on FisheryProgress, FIPs must either:

1. Demonstrate that they are **in good standing** with the initial requirement by:
  - a. Providing information and evidence that their completed actions were adequate to communicate about the Policy Statement(s) and the availability of grievance mechanisms and that the actions are designed to reach all fishers in the Unit of the FIP OR

- b. Submitting an SRA in lieu of directly reporting on this requirement  
OR
- 2. Demonstrate that they are **working toward** the initial requirement by providing information related to actions that are planned, underway, and/or completed

### Progress Reporting

Due to the ongoing nature of this work, all FIPs must provide regular updates on their continuing efforts to make fishers aware of their rights. Progress reporting can include efforts related to ensuring fishers are aware of and understand the FIP's commitments and available grievance mechanisms as well as local and national labor laws and any other protections relevant to employment conditions within the FIP.

The content and frequency of progress reporting will vary as follows:

- If the FIP was in **good standing** at its most recent prior report, it must report annually and either:
  - Submit an update on its ongoing efforts OR
  - Continue reporting on Requirements 2.1 (every three years) and 2.2 (every six months)
- If the FIP was **working toward** the requirement at its most recent prior report, it must report every six months and either:
  - Submit information demonstrating it has achieved good standing with this requirement OR
  - Submit updated information on planned, underway, and/or completed actions working toward this requirement

### 1.3.2 RATIONALE AND ADDITIONAL INFORMATION

Fishers' awareness of their rights and the mechanisms available to them to report and remediate grievances is essential to ensure that the working environment is safe and healthy and that human rights are upheld in the workplace. An informed and empowered workforce can serve as a powerful workplace monitor that identifies issues as they occur, identifies opportunities to reduce risk, and engages with management to continuously improve working conditions.

Meaningful engagement with fishers can take time, which is why FIPs have the option to share information about their work toward meeting this requirement. For example, FIPs may want to conduct a robust workforce assessment and identify trusted labor rights or



community organizations to partner with on fisher engagement prior to conducting the awareness-raising activities.

Importantly, building fishers' awareness of rights is not a one-time activity. It is a process of ongoing engagement and continuous improvement, including for FIPs that are in good standing with this requirement. For example:

- FIPs with high fisher turnover means that awareness and training activities will have to be regularly conducted to ensure new fishers are educated about their rights.
- Changes in a FIP's commitments, available grievance mechanisms, and even local or regional laws will require updating awareness raising activities and materials.
- Regular and targeted engagement—such as refreshers, peer-led discussions, and materials that accommodate different fisher languages and literacy levels—can support stronger understanding and engagement of fishers in the FIP.

FishChoice strongly encourages FIPs to work with local labor and human rights agencies and organizations, worker representatives (where they exist), and relevant government agencies to meet this requirement. Those organizations are well-positioned to help FIP participants understand how to communicate with fishers about their rights in a way that empowers them. Such agencies, organizations, and representatives are also well-positioned to support FIPs and fishers in understanding the best pathways for reporting and remediating different types of grievances or navigating any serious human rights violations should they occur. In cases where some or all fishers within the FIP are members of a union and/or covered by collective bargaining agreements, FIPs should include information and evidence of agreements and union activities that support fishers' awareness of rights in their FisheryProgress profile for this requirement.

## **1.4 Assess the Availability and Effectiveness of Grievance Mechanisms for Fishers in the FIP**

### **1.4.1 REQUIREMENT DETAILS**

FIPs must assess the availability and effectiveness of systems—such as grievance mechanisms—for all fishers harvesting and transshipping FIP products to raise and resolve issues. The mechanisms and systems in place to raise and resolve issues will vary across FIPs and by context. The intent is that FIPs understand both the extent to which fishers

have a way to report grievances in a timely<sup>17</sup> manner as well as the effectiveness and areas for improvement of the systems that are in place. To meet this requirement, FIPs must complete the [grievance mechanism summary assessment form](#) and provide evidence for all available grievance mechanisms when available.

## Applicability and Scope

This requirement applies to all active FIPs on FisheryProgress.

The assessment of mechanisms and processes to address grievances and disputes, as well as the associated appraisal of effectiveness, must consider all fishers in the FIP's scope or unit (i.e., Unit of the FIP). That includes all fishers harvesting and transshipping FIP products, regardless of whether the fishers and their employers are formal FIP participants.

## Initial Reporting

During their first annual report after being listed as active on FisheryProgress, FIPs must either:

1. Demonstrate that they are in **good standing** with the initial requirement by:
  - a. Submitting the [grievance mechanism summary assessment form](#) with all required fields related to the assessment and initial appraisal of effectiveness completed as well as supporting evidence<sup>18</sup> OR
  - b. Submitting an SRA in lieu of directly reporting on this requirement

OR

2. Demonstrate that they are **working toward** the initial requirement by providing information and evidence on their completed and/or planned actions toward completing the initial assessment and appraisal of effectiveness

## Progress Reporting

All FIPs must provide regular updates on the availability of grievance mechanisms and their effectiveness.

The content and frequency of progress reporting will vary as follows:

- If the FIP was in **good standing** at its most recent prior report, it must report annually and either:

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<sup>17</sup> For the purposes of this requirement, "timely" means at least once every 24 hours, regardless of whether they are on land or at sea.

<sup>18</sup> See the [FIP Review Guidelines](#) for additional guidance.

- Complete all fields in the [ongoing appraisal form](#), which includes identifying any changes to existing grievance mechanisms available to fishers and an updated brief appraisal of the effectiveness of the grievance mechanism(s) and/or dispute processes, which considers factors such as the extent to which it is used, its accessibility, how long it takes for grievances to be processed, and general challenges and/or successes OR
- Continue reporting on Requirements 2.1 (every three years) and 2.2 (every six months)
- If the FIP was **working toward** the requirement at its most recent prior report, it must report every six months and either:
  - Submit evidence demonstrating it has achieved good standing with this requirement, including the [grievance mechanism summary assessment form](#) OR
  - Submit a progress update on completed, underway, and/or planned actions working toward this requirement

#### Definitions

Grievance mechanism: A formal, legal or nonlegal complaint and remediation process that can be used by fishers who are being negatively affected by certain business activities and operations.

Remediation: The process of providing a remedy for a human rights abuse and the substantive outcomes that can counteract, or make good, the negative impact of the abuse (Source: Based on [Shift/Mazars LLP](#)).

### 1.4.2 RATIONALE AND ADDITIONAL INFORMATION

Grievance and dispute resolution systems play an important role in a range of contexts, from formal employment to cooperatives of self-employed fishers. This requirement aims to ensure that FIP participants and stakeholders have a robust understanding of fishers' ability to report issues on land or at sea, the processes that exist for addressing these issues or remediating harm, and opportunities to improve the availability and effectiveness of these processes for fishers within the FIP.

The initial assessment of available grievance and/or dispute resolution systems (henceforth referred to as grievance mechanisms) and regular annual appraisals of their effectiveness support the continuous improvement of these systems within the FIP. FIPs that submit an

SRA<sup>19</sup> may use their social workplan to report on actions to improve the reach, availability, accessibility, and effectiveness of these systems available to the FIPs' fishers. FishChoice encourages FIPs to develop improvement workplans related to grievance systems, even where not required under this Policy.

A range of entities may maintain and manage grievance mechanisms for fishers in the FIP. Some FIPs will be able to identify, appraise the effectiveness of, and choose to support improvements in existing grievance mechanisms within supply chain companies, government agencies, or worker unions. Other FIPs may discover that no mechanisms are available to fishers in the FIP or that a mechanism applies only to a subset of fishers. In such instances, FishChoice encourages FIPs to identify appropriate partners with whom to develop grievance mechanisms that are accessible; effective; and, where feasible, legally binding.

FishChoice recognizes that grievance mechanisms can and should vary based on FIP participants' specific circumstances. FishChoice acknowledges that, for example, grievances within a formal employment situation may vary from those within a cooperative of self-employed fishers. However, the traits of adequate grievance mechanisms outlined here are universal. This requirement is designed to accommodate the diversity of FIP models by allowing FIP leads and participants to identify and evaluate the effectiveness of any system used within the Unit of the FIP for the reporting and remediation of fishers' grievances. The [UNGPs](#)' list of grievance mechanism effectiveness criteria informed the questions incorporated into the templates for evaluating these systems. The UNGPs emphasize the importance of workers and affected stakeholders having a safe way to file grievances and report rights abuses.

<b>Traits of Adequate Grievance Mechanism</b>
As outlined in the <a href="#">UNGPs</a> , both State-based and non-State-based non-judicial grievance mechanisms should be legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continuous learning, and based on engagement and dialogue. Best practice is that fishers are involved in the development of grievance mechanisms and have several reporting avenues, including directly at the workplace and/or through external organizations. In many countries, there are systems run by trade unions, NGOs, industry groups (including suppliers and retailers/brands), or government platforms through which fishers can seek remedies for violations of their rights.

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<sup>19</sup> FIPs that submit an alternative assessment must still report against Requirement 1.4.

## 1.5 Complete a Self-Evaluation Against the FisheryProgress Criteria for Increased Risk of Forced Labor and Human Trafficking

### 1.5.1 REQUIREMENT DETAILS

FishChoice has developed a set of criteria for assessing situational factors that increase the risk of forced labor and human trafficking in a fishery. FIPs must complete a self-evaluation against these criteria by completing the Self-Evaluation of Risk Criteria in their FisheryProgress profile. The criteria for increased risk of forced labor and human trafficking in the self-evaluation are:

1. There is at-sea transshipment among large vessels in the FIP.
2. The FIP has one or more vessels with a significant foreign migrant workforce (defined as 25% or more of fishers who are not citizens of the vessel's flag state<sup>20</sup>).
3. The FIP has one or more vessels where fishing trips exceed 90 consecutive days.
4. The FIP has had a reported incident<sup>21</sup> of forced labor, child labor, or human trafficking abuse within the past two years.
5. The FIP does not have enough information to determine whether it meets any of the above criteria.

FIPs that meet one or more of these criteria must complete [Component 2](#) outlined in this HRSR Policy.

Definitions
<p><u>Transshipment</u>: The unloading of goods and/or fishers from one ship and loading them into another to complete a journey to a further destination.</p> <p><u>Fishing trip</u>: Any voyage during which fishing takes place. The duration of a fishing trip includes all time spent away from the port(s) of origin. That includes but is not limited to time spent at sea, docked in foreign ports, soak time, and time spent resting in remote areas without access to communications.</p>

<sup>20</sup> For the purposes of Risk Criterion 2, European Union (EU) citizens working on an EU member state-flagged vessel may be considered the same as citizens of the vessel's flag state, i.e., they do not count toward the calculation of foreign migrant workforce.

<sup>21</sup> Please see FisheryProgress' [Process for Addressing Concerns About FIP information](#) for details on what constitutes a "reported incident."

## Applicability and Scope

All active FIPs on FisheryProgress must meet this requirement.

Responses to the risk criteria must cover all vessels and fishers in the FIP's scope or unit (i.e., Unit of the FIP). That includes all fishers and vessels harvesting or transshipping FIP products, regardless of whether they are formal FIP participants.

## Initial Reporting

FIPs must meet this requirement to be listed as active on FisheryProgress.

## Progress Reporting

FIPs must repeat the Self-Evaluation of Risk Criteria each year as part of their annual report.

## 1.5.2 RATIONALE AND ADDITIONAL INFORMATION

Some situational factors — including transshipment, migrant workforce, and extended time at sea — are correlated with an increased risk<sup>22</sup> that forced labor and human trafficking could occur onboard fishing vessels. For example, risk of such rights violations is higher in situations where vessels spend extended periods of time at sea and/or docked in foreign ports. In those instances, authorities' monitoring and oversight abilities are limited and simultaneously the fishers' freedom of movement is restricted. The above criteria aim to identify which FIPs listed on FisheryProgress may face those situational risks and therefore require a deeper assessment of risk specific to the FIP.

FishChoice encourages FIPs to use independently verified data, data triangulation, and/or qualified experts to determine the responses to criteria. FishChoice, however, does not have specific requirements for who must complete the self-evaluation of risk criteria.

<b>Understanding Risk</b>
It is important to note that meeting one or more of the risk criteria does not mean that a particular FIP is at a high risk of human rights violations. Likewise, not meeting any of the risk criteria does not mean that a particular FIP is at a low risk of human rights violations. The risk criteria highlight the context in which the FIP operates. The only way to determine the true risk level of a particular FIP is to complete a detailed risk assessment.

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<sup>22</sup> Walk Free. (2018). Fishing | Global Slavery Index. Global Slavery Index.

## Component 2: Additional Requirements for FIPs that Meet the Risk Criteria

### 2.1 Complete a Risk Assessment

#### 2.1.1 REQUIREMENT DETAILS

FIPs operating in a higher-risk context, defined as meeting one or more of the criteria for increased risk of forced labor and human trafficking (see [Requirement 1.5](#)), must complete a risk assessment. They can meet Requirement 2.1 in one of two ways:

1. **Complete a risk assessment using the SRA Tool.** FIPs may complete an SRA of the Core FisheryProgress SRA Indicators<sup>23</sup> (see [Appendix A](#) for more details) that meets the following criteria:
  - a. The assessment must be completed using the FisheryProgress Risk Assessment Template or the SRA Tool Assessment Template.<sup>24,25</sup>
  - b. A preapproved<sup>26</sup> [qualified human rights and social responsibility consultant](#) must complete the assessment.
  - c. The assessment must include consultation with fishers and fisher representatives — for example, fisher trade unions or fisher organizations, labor rights NGOs, or other civil society organizations that represent fishers.

*Note: Throughout the remainder of this HRSR Policy, this option is referred to as the completion of an SRA.*

2. **Submit an alternative assessment.** FIPs may provide documentation of an alternative assessment (e.g., social risk assessment, preassessments, or audits as part of a social standard or certification program, recent research studies, or

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<sup>23</sup> The risk assessment may optionally also include non-Core SRA Indicators (see Component 3).

<sup>24</sup> Please find both templates in the [templates section](#) of the user dashboard.

<sup>25</sup> FIPs that have participated in a formal audit as part of a recognized social standard/program may use data collected as part of that audit to score aligned core FisheryProgress indicators in the SRA using [published equivalency mapping guides](#) designed for their standard and the SRA.

<sup>26</sup> Before the SRA is conducted, the FIP must reach out to FishChoice to confirm that the selected consultant meets FisheryProgress qualifications. Failing to obtain the preapproval may result in additional costs to the FIP due to the need for a reassessment by a qualified assessor and potentially the need to be moved to inactive status for failure to meet the initial requirement. Please find more details on consultant qualifications [here](#).

outputs of a partnership with a labor or human rights organization focused on identifying and addressing risks).

- a. The FIP must submit either the alternative assessment results (if the assessment includes information on areas of risk) or a summary of alternative assessment findings.
- b. The FIP must complete and submit the [Alternative Assessment Summary Form](#), which enables collection of standardized information about the alternative assessment from all FIPs that choose this option.
- c. The alternative assessment must address, at minimum, the following themes: Forced Labor (SRA1.1.2), Human Trafficking and Fair Recruitment (SRA1.1.3), Debt Bondage in Small-Scale Fisheries (SRA1.1.4), Child Labor (SRA1.1.5), Grievance Reporting and Access to Remedy<sup>27</sup> (SRA2.1.1).

### **The SRA Tool for the Seafood Sector**

The SRA is a diagnostic, benchmarking, and risk-assessment tool to support human rights due diligence in seafood supply chains. The SRA Tool was developed by a broad coalition of experts across the conservation and social responsibility fields who drew from leading social responsibility standards to create a comprehensive set of indicators for social performance that work in large- and small-scale fisheries.

The SRA Tool operationalizes “The Monterey Framework,”<sup>28</sup> a shared definition of social responsibility inclusive of:

- Protecting human rights, dignity, and access to resources
- Ensuring equality and equitable opportunity to benefit
- Improving food, nutrition, and livelihood security

### **Applicability and Scope**

All active FIPs on FisheryProgress that meet one or more of the criteria for increased risk of forced labor and human trafficking must meet this requirement.

With regard to scope of the assessment:

- Any SRA must align with the FIP’s scope or unit (i.e., Unit of the FIP) and must be based on a representative sample of all vessels and fishers in the FIP’s scope. That

<sup>27</sup> This includes assessment of availability and access to Wi-Fi for vessels that have fishing trips over 24 hours.

<sup>28</sup> Kittinger, J. N., Teh, L. C. L., Allison, E. H., Bennett, N. J., Crowder, L. B., Finkbeiner, E. M., Hicks, C., Scarton, C. G., Nakamura, K., Ota, Y., Young, J., Alifano, A., Apel, A., Arbib, A., Bishop, L., Boyle, M., Cisneros-Montemayor, A. M., Hunter, P., Le Cornu, E., ... Wilhelm, T. A. (2017). Committing to socially responsible seafood: Science, 356(6341), 912–913. <https://doi.org/10.1126/science.aam9969>



includes all fishers harvesting or transshipping FIP products, regardless of whether the vessels and fishers are formal FIP participants.

- Any alternative assessment must describe the scope and how it is relevant to the FIP.

### Initial Reporting

Once a FIP reports meeting one or more criteria for increased risk of forced labor and human trafficking, it has 12 months to meet the risk assessment requirement.

### Progress Reporting

#### **1. FIPs must conduct future risk assessments as follows:**

- a. FIPs that completed an SRA must repeat the risk assessment against all Core FisheryProgress SRA Indicators every three years.
  - b. FIPs that completed an alternative assessment must provide an updated assessment that includes all minimum required themes every three years.
2. **For All FIPs:** If significant changes occur in a FIP such that the existing SRA can no longer be considered representative of the FIP or such that the alternative assessment no longer is relevant for the FIP, the FIP must provide a new assessment within 12 months of when those changes are reported. For additional information, please see the [FIP Review Guidelines](#).

## 2.1.2 RATIONALE AND ADDITIONAL INFORMATION

FIPs that meet one or more of the criteria in [Requirement 1.5](#) for increased risk of forced labor and human trafficking in fisheries must conduct a risk assessment to understand the true level of risk in the FIP. This requirement draws on methods and tools that are well-suited to the fishing context by recommending the SRA tool as the foundation for the risk assessment. FishChoice recognizes that FIPs even without these situational factors could still be at risk for human rights violations, and therefore FishChoice encourages all FIPs to conduct a risk assessment and voluntarily comply with Requirement 2.1 (see [Component 3](#)).

While the SRA is the recommended assessment tool, FishChoice recognizes that it may not always be the most appropriate tool due to variations in contexts and budgets. For this reason, FIPs have the option to submit an alternative assessment that identifies priority social issues and risks. However, FishChoice requires a minimum set of themes and risk areas be assessed regardless of assessment type. These required themes pertain to some

of the most egregious forms of rights abuses: forced labor, human trafficking, debt bondage, child labor, and grievance reporting/access to remedy.

FIPs may also use alternative assessments as a key input to an SRA. FIPs can utilize data from any alternative assessment (e.g., other audits, internal and/or informal; pre-assessments; social risk assessments; or recent research studies) as a single source of evidence (secondary data) to initiate evaluating/scoring SRA indicators.<sup>29</sup>

FIPs that have undergone formal social auditing may use the equivalency mapping process to use the data collected from formal audit(s) of one of these recognized standards to complete the SRA.<sup>30</sup> Please note, however, that with any process reliant on third-party data, the FIP is knowingly adopting risk related to accuracy and findings. Fisher and worker testimonies are fundamental to understanding the actual risk and assessors should be highly aware of this gap and make strong considerations on how to supplement the equivalency mapping process with meaningful worker engagement.

### **Understanding and Highlighting the FIP's Social Stakeholders**

In addition to engaging with fishers and their representatives to complete the risk assessment, FisheryProgress recommends HRSR consultants provide a full list of social stakeholders that have an interest in or whom the FIP's work impacts. That could include local government agencies, international development agencies, industry associations, and others. As part of the final risk assessment report, HRSR consultants should include an overview of social stakeholders, how they were engaged in the assessment, and how the FIP impacts them. Doing so is a great way for the FIP to demonstrate that it understands the stakeholder landscape in which the FIP operates and is taking steps to engage with those stakeholders.

## **2.2 Create and Implement a Social Workplan**

### **2.2.1 REQUIREMENT DETAILS**

Where applicable, FIPs must develop and implement a workplan to address risks identified in their social risk assessment (see [Requirement 2.1](#)). FishChoice encourages collaborative development processes to ensure that the workplan is both feasible and responsive to the

<sup>29</sup> Find guidance on how to use alternative assessments as inputs to an SRA in *Guidance for the Use of Existing Audit or Assessment Data in SRA-based Risk Assessments* located in the user dashboard under the Resources tab.

<sup>30</sup> The equivalency guides and additional resources can be found in the user dashboard under the Resources tab and more information on processes can be found in the FIP Review Guidelines.

needs and perspectives of those most affected. Whether a workplan is required and what type of workplan is accepted varies according to the risk assessment approach the FIP followed under Requirement 2.1 above. Specifically:

**1. For FIPs that have completed an SRA:**

- a. For all indicators that score as high risk, the FIP must create a social workplan that describes the actions it will undertake to improve scores to at least the medium-risk level on the SRA tool.
- b. FIPs must use the FisheryProgress social workplan template<sup>31</sup> to document their workplan and upload it to the Documents section in the HRSR Policy Requirements section of their FisheryProgress Profile. Additionally, FIPs must submit their social workplan actions under the social workplan section of their FisheryProgress profile. A preapproved qualified human rights and social responsibility consultant must lead the development of the workplan.<sup>32</sup>
- c. FIPs that score low or medium risk on all indicators are not required to complete a social workplan, although it is recommended they do so for medium-risk-scoring indicators.

**2. For FIPs that have submitted an alternative assessment:**

- a. The FIP must provide a workplan or corrective action plan related to the alternative assessment findings. The workplan must address any findings and risks related to the minimum required themes, as outlined in [Requirement 2.1](#).
- b. FIPs must use the FisheryProgress social workplan template to document their workplan and upload it to the Documents section in the HRSR Policy Requirements section of their FisheryProgress Profile. Additionally, FIPs must submit their social workplan actions under the social workplan section of their FisheryProgress profile.

<b>Creating Social Workplans</b>
It is best practice to include all relevant stakeholders in workplan development. FIPs should share results of the risk assessment with vessel owners, captains, skippers, fishers, fisher representatives, and other relevant stakeholders. Workplans are most

<sup>31</sup> Please find all reporting templates in the [templates section](#) of the user dashboard.

<sup>32</sup> Before the workplan is developed, the FIP must reach out to FishChoice to confirm the selected consultant meets FisheryProgress qualifications. Failing to obtain the preapproval may result in additional costs to the FIP due to the need to redevelop the workplan with the involvement of a qualified consultant and potentially the need to be moved to inactive status for failure to meet the initial requirement. Find more details on consultant qualifications [here](#).

successful when all relevant stakeholders contribute to their development, take ownership of their activities, and have clearly defined roles in their implementation.

## Definitions

Social workplan: Includes a list of actions the FIP will undertake, either to address deficiencies in meeting the HRSR Policy requirements or to address areas of risk identified by the FIP's risk assessment. The workplan must include the organizations or people responsible for completing each action and a month and year deadline for completing each action. FIPs may also include a breakdown of specific tasks under each action.

## Applicability and Scope

All active FIPs on FisheryProgress that either completed an SRA that includes high-risk-scoring indicators or submitted an alternative assessment must meet this requirement.

For FIPs that completed an SRA, the workplan's scope must be based on the scope of the assessment findings. FIPs that opted to use an alternative assessment must provide an explanation of the relevance of their workplan to their assessment.<sup>33</sup>

## Initial Reporting

Once a FIP reports meeting one or more criteria for increased risk of forced labor and human trafficking, it has up to 18 months to complete the social workplan. FishChoice encourages FIPs to submit their workplans at the same time as their risk assessment (see [Requirement 2.1](#)) but may also submit the workplan six months after the assessment should they need more time to do so.

## Progress Reporting

1. **For FIPs that have completed an SRA:** FIPs must report on social workplan progress every six months, as part of their existing six-month and annual reports, until their annual SRA shows that all indicators have scored as low or medium risk.<sup>34</sup> FIPs must report the following during their existing six-month and annual reports:
  - a. **Six-month reports.** FIPs must report progress on the actions in their social workplan and submit evidence for the progress reported.

<sup>33</sup> The explanation of relevance is a required field in the social workplan template.

<sup>34</sup> FIPs may voluntarily continue to report on indicators after their score has reached medium or low risk.

- b. **Annual reports.** FIPs must:
  - i. Report progress on the actions in their social workplan and submit evidence for the progress reported.
  - ii. Update the workplan to reflect the most recent indicator scores, if the FIP chose to submit an updated SRA.
- 2. **For FIPs that have submitted an alternative assessment:** FIPs must report on social workplan progress every six months, as part of their existing six-month and annual reports, and submit evidence for the progress reported. FIPs must continue to report on their workplan until the three-year reassessment is conducted and their social workplan is updated according to the findings of the new assessment.

### 2.2.2 RATIONALE AND ADDITIONAL INFORMATION

At their core, FIPs are a tool for continuous improvement. Requiring FIPs to develop and implement a social workplan ensures that identified risks to fishers—especially those related to human rights and labor abuses—are not only assessed but actively addressed. The social workplan serves as a roadmap for measurable progress and accountability, and parallels the structured improvement approach already embedded in environmental FIP requirements. FishChoice encourages collaborative development processes to ensure that the workplan is both feasible and responsive to the needs and perspectives of those most affected.

This requirement reinforces the importance of using risk assessment findings to guide action. For FIPs that use the Social Risk Assessment (SRA) tool, the workplan is focused on reducing high-risk scores to at least the medium-risk level. For FIPs that submit an alternative assessment, the workplan or corrective action plan must respond directly to the issues and risk areas identified through that process. In both cases, the workplan enables FIPs to move from understanding risks to addressing them in a clear, documented, and trackable way.

Workplans also support transparency, allowing stakeholders to see how FIPs are responding to potential risks to fishers' rights and well-being. Ongoing progress reporting ensures that workplans are not static, but evolve alongside new data, updated assessments, or emerging challenges in the fishery. This requirement, therefore, not only supports FIPs to undertake the actions needed to protect fishers but helps FIPs build trust and demonstrate leadership on social responsibility.

# Component 3: Requirements for Voluntary Reporting

## 3.1 Reporting on Voluntary Risk Assessments and Workplans

This HRSR Policy focuses on a set of core requirements for all FIPs and additional requirements for those FIPs that meet criteria for increased risk of forced labor and human trafficking due to situational factors.

FishChoice recognizes that any FIP may have areas of high risk and potentially have abuses occurring, even if it does not meet the specific risk criteria included in [Requirement 1.5](#). There are also other social responsibility concerns that extend beyond the core human and labor rights included in the Core FisheryProgress SRA Indicators,<sup>35</sup> such as food and livelihood security. FishChoice therefore encourages all FIPs listed on FisheryProgress to assess their social risk and report on their efforts to address them. By voluntarily reporting, FIPs can demonstrate their leadership in adopting best practices and meeting seafood buyers' human rights due diligence requirements.

FIPs that are reporting voluntarily fall into two categories:

1. FIPs that **are not** required to meet Requirements 2.1 and 2.2 but voluntarily choose to
2. FIPs that **are** required to meet Requirements 2.1 and 2.2 but voluntarily choose to assess and report on risk themes, workplan actions, and/or progress beyond what is required<sup>36</sup>

### 3.1.1 REQUIREMENT DETAILS

FIPs choosing to exceed the minimum requirements laid out in Components 1 and 2 may do so by submitting either an SRA or evidence of an alternative assessment. They must follow the guidelines below related to the risk assessment and associated social workplan. Guidelines vary based on the type of assessment.

#### 1. For FIPs that have completed an SRA:

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<sup>35</sup> See Appendix A for a complete list of SRA topics and indicators.

<sup>36</sup> This may take many forms, including but not limited to: A FIP may expand the scope of its risk assessment to include themes beyond the minimum; a FIP with an SRA may choose to include medium-risk-scoring indicators in its workplan; or a FIP that conducted an SRA focused on FisheryProgress Core SRA Indicators may submit an alternative assessment that assesses additional themes.

- a. FIPs must use the FisheryProgress Risk Assessment Template or the SRA Tool Assessment Template.<sup>37</sup>
- b. FIPs that are not required to meet [Requirement 2.1](#) may choose which SRA indicators they assess.
- c. A preapproved<sup>38</sup> [qualified HRSR consultant](#) must conduct the SRA.
- d. The assessment must include consultation with fishers and fisher representatives, for example, fisher trade unions or fisher organizations, labor rights NGOs, or other civil society organizations that represent fishers.
- e. If the FIP voluntarily submits an SRA, it may also voluntarily meet Requirement 2.2.<sup>39</sup>

**2. For FIPs that have submitted evidence of an alternative assessment:**

- a. FIPs must complete the [Alternative Assessment Summary Form](#).
- b. FIPs may choose the focal areas of their alternative assessment.
- c. If the FIP voluntarily submits an alternative assessment, it may also voluntarily meet Requirement 2.2.

## Applicability and Scope

All active FIPs on FisheryProgress that are voluntarily reporting must meet this requirement.

## Initial Reporting

FIPs may choose to begin voluntary reporting as part of any six-month or annual report.

## Progress Reporting

FIPs that voluntarily submit a risk assessment (SRA or alternative assessment) may reassess at a frequency of their choosing, but FishChoice encourages reassessment at least every three years. FIPs that submit a social workplan must adhere to the progress reporting timelines from Requirement 2.2, even when that workplan is voluntary.

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<sup>37</sup> Please find all reporting templates in the [templates section](#) of the user dashboard.

<sup>38</sup> Before the SRA is carried out, the FIP must reach out to FisheryProgress to confirm the selected consultant meets FisheryProgress qualifications. Failing to obtain the preapproval may result in additional costs to the FIP due to the need for a reassessment by a qualified assessor.

<sup>39</sup> FIPs that voluntarily complete an SRA are not required to submit a corresponding workplan, even if their SRA shows areas of high risk. However, FishChoice strongly encourages FIPs to consider the findings of the SRA, decide how and when to prioritize areas of risks, and develop and submit workplans to address some or all of their identified risks.

### 3.1.2 RATIONALE AND ADDITIONAL INFORMATION

Setting basic guidelines for FIPs choosing to exceed minimum requirements ensures that reporting information is presented in the same framework, which facilitates FisheryProgress users' understanding. Furthermore, it encourages all FIPs to take steps to address potential risks, regardless of whether they are operating in a higher-risk context or not. Component 3 allows flexibility in voluntary reporting of risk findings. FishChoice encourages FIPs to use the SRA for this purpose, but they may also choose to report findings from alternative assessments.

## Appendix A: Core FisheryProgress SRA Indicators

Table 2 below presents the full set of SRA risk indicators (RIs).<sup>40</sup> **The RIs highlighted in blue and noted with an asterisk (\*) are the Core FisheryProgress SRA Indicators.** Those are indicators that:

- Are required to be assessed (as applicable<sup>41</sup>) for FIPs that meet one or more of the criteria for increased risk of forced labor and human trafficking (see [Requirement 1.5](#) and [2.1](#)).
- Correspond to the required categories (as applicable<sup>42</sup>) that must be addressed in the FIP's Policy Statement(s).

**Table 2: SRA Risk Indicators**

Component		Risk Indicator
<b>Principle 1: Protect human rights, dignity, and access to resources</b>		
1.1 Human and labor rights	1.1.1*	Abuse and harassment
	1.1.2*	Forced labor
	1.1.3*	Human trafficking and fair recruitment

<sup>40</sup> The table below reflects version 2.0 of the SRA.

<sup>41</sup> The SRA is designed to accommodate a range of fisheries and contexts and provides a comprehensive set of RIs to that end. That means that not all RIs are applicable to all FIPs. For additional guidance on determining which RIs are applicable, please refer to the Scoring Guidance table in the [Social Responsibility Assessment Tool for the Seafood Sector](#).

<sup>42</sup> Ibid.



	1.1.4*	Debt bondage in small-scale fisheries or smallholder farms
	1.1.5*	Child labor
	1.1.6*	Freedom of association and collective bargaining
	1.1.7*	Earnings and benefits
	1.1.8*	Adequate rest
	1.1.9a*	Access to basic services for worker housing/live-aboard vessels
	1.1.9b	Access to basic services for small-scale fishing or smallholder farming communities
	1.1.10*	Occupational safety
	1.1.11*	Medical Response
	1.1.12*	Observer rights
1.2 Access rights	1.2.1*	Customary rights
	1.2.2	Corporate responsibility and transparency
<b>Principle 2: Ensure equality and equitable opportunity to benefit</b>		
2.1 Equality	2.1.1*	Grievance reporting and access to remedy
	2.1.2a	Inclusive governance of fisheries and aquaculture resources
	2.1.2b	Inclusive governance within the workforce
2.2 Equity	2.2.1	Equal opportunity to benefit
	2.2.2*	Discrimination
<b>Principle 3: Improve food and livelihood security</b>		
3.1 Food and Nutrition Security	3.1.1a	Impact on food and nutrition security
	3.1.1b	Food and nutrition security for small-scale fishing and smallholder farming communities

	3.1.2	Healthcare
	3.1.3	Education
3.2 Livelihood Security	3.2.1	Benefits to and within the community
	3.2.2	Economic flexibility and autonomy
	3.2.3	Livelihood security

## Appendix B: Key Related Resources

Find key resources, templates, and supporting documentation associated with this HRSR Policy on FisheryProgress.<sup>43</sup> Specifically, readers can access:

- The FisheryProgress Glossary, which contains key terms and definitions related to the understanding of this HRSR Policy and related materials. Note that terms underlined in this HRSR Policy are included in the Glossary
- Templates and forms referenced in this HRSR Policy
- Guidance documents to support meaningful implementation of the HRSR Policy requirements
- Additional social responsibility resources intended to support FIPs in taking steps to address human rights risks and other social responsibility challenges in their fisheries
- The FIP Review Guidelines, which contain important details related to the implementation of this HRSR Policy and FisheryProgress's approach to evaluation of FIPs social information and progress
- Qualifications for HRSR consultants and a database of FIP consultants

FishChoice encourages FIP implementers to look to the FIP Community of Practice, of which FishChoice is an active participant, as a key source for information to support effective and meaningful implementation of the HRSR Policy.

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<sup>43</sup> Some resources are available on the public-facing FisheryProgress site, while others are available to FIP implementers via the [user dashboard](#).