

FISHERYPROGRESS.ORG

May 12, 2021

Dear FisheryProgress Users,

Today marks the launch of FisheryProgress Human Rights and Social Responsibility Policy. Social responsibility efforts in the seafood sector are still in the early stages of development. This policy is a strong starting point for helping fishery improvement projects (FIPs) take steps to improve their social performance, and for providing seafood buyers with essential information to support due diligence requirements.

The [policy](#) and the [social review guidelines](#) explain what will be required of FIPs reporting on FisheryProgress and how our team will evaluate the information FIPs submit. This letter complements those documents with information about the process we undertook to develop the policy, our rationale for key decisions, and our plans for evaluating and strengthening the policy in the future.

First and foremost, we are committed to supporting FIPs to meet these new requirements

As a platform for fishery improvement, FisheryProgress' goal is for FIPs to succeed at improving environmental and social performance in their fisheries. We recognize that for many FIPs, social responsibility will be new. In coordination with the FIP Community of Practice and other partners, we are developing a comprehensive suite of trainings and resources to help FIPs build their capacity to implement the requirements in our policy.

For the first year after the policy launches, we will provide intensive coaching and, where possible, financial support to FIPs that choose to implement the policy ahead of the required deadlines. We will use this first year as a pilot period to assess both the effectiveness and practicality of the policy. We anticipate making a round of minor revisions to the policy and the review guidelines based on feedback from the pilot year.

Finally, we recognize that meeting these policy requirements entails additional costs for FIPs, especially those that are required to complete a risk assessment and develop a social workplan. FIPs are unique because of the engagement of the private sector in supporting improvements. While businesses have started to prioritize social responsibility in their seafood supply chains, human rights due diligence has not yet become the norm across the industry. FisheryProgress will work with the Conservation Alliance for Seafood Solutions to advocate for buyers at all levels of the supply chain to invest in social responsibility. Financial support from companies that purchase seafood from FIPs will be essential in helping FIPs meet these policy requirements, just as it is essential for FIPs to meet their environmental goals.

Protecting fishers' human rights is imperative

In recent years, investigations by NGOs and journalists have brought to light the urgent need to address human rights abuses in fisheries. As a result, global seafood businesses have started to assess and take action to address human rights risks in their supply chains. In 2019, the Conservation Alliance for Seafood Solutions updated the [Guidelines for Supporting Fishery](#)

[Improvement Projects](#) to encourage FIPs to address social responsibility. About 20% of FIPs on FisheryProgress had begun sharing information about a variety of social responsibility efforts they were undertaking. FisheryProgress was actively monitoring the sector-wide conversation about social responsibility, but waiting for community alignment before taking action.

This changed in May 2019, when we received an allegation of a human rights abuse in a FIP reporting on FisheryProgress. The allegation made it clear that in addition to allowing human rights abuses in FIPs to go unaddressed, taking a wait-and-see approach on social responsibility posed a significant risk to FisheryProgress' credibility.

“Respect for human rights is essential in the fishing sector if we want to have sustainable fishing.”

– FIP stakeholder

Expert advice and extensive stakeholder feedback informed the policy

We embarked on an intensive, inclusive, multi-stakeholder process, supported by the David and Lucile Packard Foundation and the Walmart Foundation, to develop the policy over nearly two years. This started with convening a diverse [Social Advisory Committee](#) of experts in human and labor rights, socioeconomic issues in fisheries, FIP implementation, and corporate social responsibility in seafood supply chains. We are deeply grateful for the time each member of the committee invested in providing advice on all aspects of the policy, but note that the final decision-making responsibility for the policy rested with FisheryProgress.

We also conducted three rounds of stakeholder feedback – an initial round in late 2019 to take the temperature of the community as we were getting started, and two rounds in 2020 to solicit feedback on the original draft policy and proposed major changes. We used surveys, group calls, and one-on-one outreach to engage hundreds of stakeholders, including businesses, human rights and conservation NGOs, and three-quarters of the FIPs currently active on FisheryProgress.

We aimed to develop a policy that would be both impactful and practical

At its core, FisheryProgress is about improvement and transparency. During this process, we learned from our human rights advisors that stepwise improvement, while central to the FIP model, is not typically the approach used to address human rights abuses. And when human rights abuses are made transparent, laws and reputational risks often mean buyers must discontinue sourcing instead of continuing to engage in improvement efforts, leaving fishers vulnerable to continued abuse. We grappled with both of these dynamics when considering how to design a policy that would help and not harm fishers.

FisheryProgress currently has 95% of global FIPs reporting on our site. We know that FIPs often struggle to secure enough funding for their environmental work, which has been compounded by the impact of the coronavirus pandemic. These FIPs also operate in a vast range of contexts – from artisanal to industrial fisheries, where fishing is done by hand from shore or on vessels for days or months, in countries with strong to weak legal frameworks for human rights. Because FIPs will be the

“It is tricky to strike a balance between urgency due to the nature of the issue and incremental implementation due to the financial and human costs this policy will add on FIPs.” – Industry stakeholder

most directly and immediately impacted by the new policy requirements, we had to carefully consider how to make them practical for FIPs to implement.

We are starting with a tiered approach, with the goal that all FIPs will eventually meet international standards for due diligence

International best practices outlined in the [UN Guiding Principles on Business and Human Rights](#) require companies to undertake human rights due diligence. We drew heavily on these principles in developing our policy, and our long-term goal is that all FIPs complete a risk assessment and develop a social workplan to address areas of high risk.

As a starting point, our policy requires FIPs with situational factors that are known to increase the risk of forced labor and human trafficking to complete a risk assessment and develop a social workplan to address any high-risk areas identified in the assessment. FIPs may also choose to take these steps voluntarily if they do not flag the policy's risk criteria.

The risk criteria focus on situational factors that occur most often in industrial fisheries, including transshipment, migrant labor, and long trips at sea. We decided on this focus for two main reasons:

1) human rights issues in industrial fisheries are well-documented and the criteria for assessing risk is consequently more specific and objective than currently exists for small-scale fisheries; and
2) industrial fisheries are likely to have greater technical and financial capacity to meet the policy requirements.

We recognize that human rights abuses – including child labor and debt bondage – are also significant issues in small-scale fisheries. This is why all other requirements in our policy are designed for fisheries at all scales. And this is an area we are committed to evaluating and adjusting over time.

Our framework for measuring social performance is the Social Responsibility Assessment

One hallmark of the FisheryProgress approach is measuring FIP performance along a single yardstick. For environmental performance, FisheryProgress uses the Marine Stewardship Council standard because it's comprehensive, widely used across the seafood industry, and is accessible to all FIPs regardless of whether they are pursuing certification as their end goal.

We needed to identify a similar yardstick for measuring social performance. In recent years, a range of different social responsibility standards and tools have emerged, but they vary in terms of the scope of issues they cover and the type of fishery to which they are applicable. We evaluated existing standards and tools to determine if they:

- Could be used to assess performance in any type of fishery from artisanal to industrial.
- Included all core human and labor rights and socioeconomic issues referenced in the [Monterey Framework](#).
- Allowed FIPs to use information from other social certifications and audits to assess performance against the standard.

The [Social Responsibility Assessment Tool for the Seafood Sector \(SRA\)](#) drew upon the content of 18 existing social responsibility standards and tools to develop a comprehensive set of social performance indicators, each with criteria for high, medium, and low risk. The SRA covers the full

range of social issues included in the Monterey Framework, including human and labor rights, access to resources, equality and equity, livelihoods, and food security. The SRA can be used to assess social risk within a FIP, identify actions needed to address areas of high and medium risk, and track improvements over time. Because the SRA is a composite tool based on the content of other standards, FIPs can more easily map existing audit data to the indicators using the benchmarking guides under development by Elevate, who is currently managing the SRA.

We want to work with you to strengthen this policy over time

This policy is a starting point, not the end point. In 2024, we will undertake a transparent, multi-stakeholder revision process to:

- Incorporate what we have learned from the first three years of policy implementation.
- Keep pace with the evolution of social responsibility norms across the seafood sector.
- Strengthen our requirements to better address child labor, debt bondage and other human rights and labor challenges that are present in small-scale fisheries, to move toward our long-term goal of all FIPs completing a risk assessment and developing a social workplan to address high-risk areas.

We will develop a monitoring and evaluation plan by the end of 2021 and report publicly each year against the benchmarks in the plan. This will include evaluating whether our risk criteria are functioning as intended to identify FIPs with increased risks of forced labor and human trafficking and working with partners to encourage and fund small-scale fisheries to conduct risk assessments so we can develop appropriate risk criteria for these fisheries.

In the meantime, we welcome your feedback about this policy anytime. We strongly believe incorporating social responsibility into FisheryProgress is a significant step forward in achieving sustainability in the global seafood industry. However, we also recognize it requires FIPs to make changes in how they operate, which is always difficult. We look forward to continuing this dialogue with FIPs and seafood buyers as we all work toward achieving greater environmental and social responsibility in fisheries worldwide.

Sincerely,

The FisheryProgress Team