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Social Policy on the Protection of  
Human Rights in  
Fishery Improvement Projects

**Proposed Major Changes and Clarifications to the May 2020 Draft**

**Revision Date: October 12, 2020**

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**Definition**  
Defines terms.



**Implementation**  
Details on how  
FisheryProgress anticipates  
implementing the policy.



**Stakeholder Feedback**  
Examples of feedback from  
the first round of stakeholder  
input on the draft policy.

# INTRODUCTION | *Social policy development process*

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## ***Development of a Permanent Social Policy***

Since the summer of 2019, FisheryProgress has been working to develop a permanent social responsibility policy. To do so, we have facilitated a multi-stakeholder dialogue, which included consultation with our [Social Advisory Committee](#), conversations with international human rights experts and worker representatives, a survey of FisheryProgress users, and early feedback sessions with FIP leads and business users of FisheryProgress. This led to the creation of an [original draft policy](#) that we shared with the FIP community for formal feedback from May 19-June 30, 2020.

## ***Feedback on the Original Draft***

We received feedback from nearly 250 stakeholders including from more than 75% of FIPs currently active on FisheryProgress. The feedback spanned a wide range of opinions about the draft policy and its specific elements. Overall, many businesses and other users who rely on FisheryProgress data were supportive of the policy and welcomed the opportunity for FIPs to address human rights and labor issues more consistently. At the same time, many FIPs told us that while they appreciated the importance of protecting human rights, they had significant concerns about the time and costs required to implement the policy.

## ***Proposed Changes***

Based on this feedback, FisheryProgress is revising the draft social policy. Now, we're asking for your feedback on the most significant changes we're considering. Please note that this document focuses only on major changes to the policy that require additional feedback from the FIP community. For each proposal, we share a brief overview of the feedback received so you can understand the rationale behind the proposed change.



### **Vessel size**

Some of the proposals in this document differentiate between large and small vessels. We define these two terms as follows:

- **Large vessels:** 10 gross tons or more or longer than 12 meters
- **Small vessels:** less than 10 gross tons and shorter than 12 meters

## INTRODUCTION | *Focus of this document*

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This document outlines major changes to two areas of the [original draft policy](#):

### ***Requirements***

The revised policy includes six core elements:

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

Elements 1-3 remain required for all FIPs. Elements 4-6 will be voluntary to some degree – this document outlines two options for your consideration beginning on pg. 10.

### ***Allegations***

The revised policy makes some changes to how FisheryProgress will accept and report on allegations, as outlined on pg. 15 of this document. The overall process of investigating allegations and requiring remediation for verified abuses remains the same as in the [original draft policy](#).

# PROPOSAL #1 – OBSERVERS IN THE HUMAN RIGHTS CODE OF CONDUCT

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## *Feedback on the Code of Conduct*

We received feedback about the need to ensure that fisheries observers are included in the scope of workers covered under the Human Rights Code of Conduct. This feedback cited recent examples of human rights abuse of observers by fishermen, including torture and even death, as evidence of why observers' human rights must be protected while on board.

## *Proposed Changes to the Code of Conduct*

FIPs reporting on FisheryProgress must sign the Human Rights Code of Conduct, which outlines the values that FIPs will work toward upholding throughout the rest of the time the FIP is active on the site. The full Code of Conduct, including more detail on how the requirements apply to large and small vessels, can be found in Appendix A starting on pg. 18 of this document.

Fisheries observers are not usually employed by the vessel operator nor owner. Thus their recruitment, salary, training, and working hours are determined by parties external to the FIP. However, while on board there are aspects of human rights protection that are under the direct responsibility of the vessel operator. Consequently, we updated the Code of Conduct to specifically mention observers in:

- **Principle 1 (There is no discrimination, abuse, or harassment):** Fisheries observers are able to conduct duties free from assault, harassment, interference, or bribery.
- **Principle 7 (Workers and fishermen have access to basic services):** Fisheries observers are provided adequate accommodation appropriate to the size of the monitored entity and equivalent to that of the officers of the monitored entity.
- **Principle 8 (The working environment is safe, and there is an adequate medical response for workplace injuries):** There is a radio on board for vessels over 24 meters, and fisheries observers are able to access it.

## PROPOSAL #2 – VESSEL LIST

### **Feedback on Vessel List Requirement**

Stakeholders noted the value of vessel lists to support both human rights protection and traceability goals. However, many raised concerns about the practicality of requiring vessel lists in FIPs dominated by small-scale fishers, or for very large national-scale FIPs with hundreds of vessels where governments may not have or being willing to share vessel registration information.

### **Proposed Changes to Vessel List Requirement**

For small vessels, we are proposing to reduce the vessel list requirements.

For large vessels, we have added the option to incorporate work to develop a vessel list into a FIP's workplan and an exception to waive the vessel list when in situations where it is truly impossible to provide one.

For FIPs without vessels (e.g., hand harvest), we clarified how the requirements will be applied.

The updated vessel list requirements are outlined on the following pages, with **major changes highlighted in yellow**.

**In all cases, FIPs will be required to meet the vessel list requirement as part of their first report (six-month or annual report, whichever comes first) after March 2022, one year after the policy launches.** This extends the timeline proposed in the original draft policy, which required the vessel list to be provided within six months of the policy launch.



### **Stakeholder Feedback**

*"This will be the most challenging component of FisheryProgress' social policy for small-scale fisheries to uptake, including [our organization]. We work with thousands of fishers across several FMAs. A lot of guidance and flexibility would need to be given to small-scale fisheries to conduct this component of the social policy." – NGO*

*"If there is no government vessel registration system in place, I fail to see how this requirement can be implemented by the FIP. In countries like Peru, there are thousands of vessels that will fall into this category." – Industry*

*"For projects where the vessels number in the thousands, this makes it next to impossible to generate this list with any accuracy." – Industry*

## PROPOSAL #2 – VESSEL LIST | *For small vessels*

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*For small vessels (less than 10 gross tons and shorter than 12 meters):*

1. The FIP may either provide:
  - a. A vessel list with the vessel name, skipper name, flag (if applicable), national registration number (if available), and landing site; or
  - b. A description of the fleet (e.g., approximate number of fishers, landing sites, home communities, type of vessel). For example, “approximately 130 hook-and-line fishers landing snapper at the following sites: ...” or “all of the vessels smaller than 10 GT/12m fishing lobster in the country.”
2. The information provided (either the vessel list or the description) will be made public on FisheryProgress.

## PROPOSAL #2 – VESSEL LIST | *For large vessels*

*For large vessels (10 gross tons or more or longer than 12 meters) and any vessel fishing outside of its country's Exclusive Economic Zone (EEZ):*

1. The FIP must provide a list with the following information: vessel name, International Maritime Organisation number or other Unique Vessel Identifier, flag, and owner/operator.
2. If the FIP is unable to provide a vessel list that meets the above requirements, the FIP must incorporate the development of a vessel list in its public workplan, and report on progress made in developing the vessel list. During this period, the default scope of vessels covered by the FisheryProgress social policy will be all vessels fishing the species and waters listed in the FIP profile.
3. In very rare cases where a list of large vessels in the FIP cannot be obtained (for instance, national-level fisheries where governments do not hold vessel registers or where they will not share registration information), the public vessel list requirement for large vessels may be waived. In such cases, the explanation for why the vessel list cannot be provided will be included in public reporting on FisheryProgress, and the default scope of vessels covered by the FisheryProgress social policy will be all vessels fishing the species and waters listed in the FIP profile.
4. This list will be made public on FisheryProgress.



### **International Maritime Organisation number**

A permanent number assigned to ships for identification purposes. (Source: [IMO](#))

### **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. (Source: [FAO](#))



## PROPOSAL #2 – VESSEL LIST | *For mixed vessels or no vessels*

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*For FIPs with a mix of large and small vessels:*

1. The relevant requirements for each part of the fleet must be met. For example, this could mean a public vessel list of large vessels accompanied by a description of the small-scale fishing communities in the FIP.
2. The information provided will be made public on FisheryProgress.

*For FIPs with no vessels:*

1. The FIP may either provide:
  - a. The list of individuals fishing in the FIP; or
  - b. A description of the fishers (e.g., approximate number of fishers, landing sites, home communities, type of fishing practice). For example, "approximately 3,000 individuals walking off shore to glean octopus, based in the following villages: ..."
2. The information provided (either the list of individuals or the description) will be made public on FisheryProgress.

## PROPOSAL #3 – REQUIREMENTS 4-6

### **Feedback on Requirements 4-6**

The original draft of the social policy had six requirements for FIPs. Many FIPs and some seafood buyers shared concerns that requirements 4-6 (shown below) would overwhelm FIPs' available time and resources.

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

### **Proposed Options to Change Requirements 4-6**

FisheryProgress is considering making requirements 4-6 voluntary to some degree, and would like feedback on two options:

- **Option A** – Requirements 4-6 would be voluntary for all FIPs
- **Option B** – Requirements 4-6 would be mandatory for FIPs who meet criteria for being at high risk of human rights abuses and voluntary for all other FIPs

**With either option, FisheryProgress will revisit the approach in three years to assess whether there has been sufficient uptake of reporting, and may decide to change the approach at that time.**



#### **Stakeholder Feedback**

*"We believe the work on these issues should be prioritized in fisheries with the highest risk....The one-size-fits-all approach, as proposed, could create an insurmountable burden on FIPs with higher risk on environmental issues and lower risk on social issues....We are concerned that this policy may actually impede progress on environmental sustainability." – Industry*

*"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*

## PROPOSAL #3 – OPTION A | *Requirements 4-6 voluntary*

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### **Option A: Making the risk assessment, workplan, and reporting voluntary**

Under this option, FIPs could choose to do an assessment of the fishery against the elements in the Human Rights Code of Conduct, but it would not be mandatory.

- FIPs who choose to assess their social performance would use FisheryProgress to report on their progress, similar to the way they use FisheryProgress for reporting environmental progress.
- The qualitative elements in the original draft policy (e.g., using qualified assessors as outlined on pg. 15 of the [original draft](#)) would still be required to report on the site.
- FIPs that choose to begin reporting on their social performance on the Human Rights Code of Conduct issues would have to continue to do so as long as they continue to be active FIPs on FisheryProgress.

FisheryProgress would work with the FIP community, particularly seafood, retail, and foodservice companies who buy FIP products, to encourage FIPs to assess and report on their social performance. The website would provide additional visibility to FIPs that participate in social reporting.

If a FIP is not reporting on its social performance, receives an allegation of a human rights abuse, and the Allegation Panel determines that there is sufficient evidence that an abuse occurred, this reporting would become mandatory as part of the remediation plan.



#### **Highlighting FIPs leading on social reporting**

Potential options for highlighting those FIPs that choose to voluntarily report include adding a badge on the FIP's overview page, or a tracking bar showing the number of social indicators the FIP is addressing. If we move forward with this option, we will scope approaches with our technical development and advisory committees.

## PROPOSAL #3 – OPTION B | *Requirements 4-6 mandatory for high-risk FIPs*

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### ***Option B: Requiring high-risk FIPs to complete the risk assessment, workplan, and reporting***

Under this option, FIPs that are at high risk of human rights abuses will be required to complete the risk assessment, workplan, and reporting. FIPs that do not meet the high-risk criteria may assess and report on a voluntary basis as described in option A.

A FIP that meets any one of the following criteria is considered high risk:

- 1. FIPs with one or more vessels which have been subject to a U.S. Customs & Border Protection Withhold Release Order within the past four years.**
- 2. If there are large vessels using at-sea transshipment in the FIP.**
- 3. Fisheries where workers are not able to come ashore and access grievance procedures at least every 90 days.** This includes:
  - a. Trips where fishers are at sea for more than 90 days.
  - b. If the vessel offloads catch at a port state where fishers are not allowed entry into the country (e.g., because of visa restrictions).
  - c. Where grievance procedures are not available or accessible to workers, for instance because of language, organizational, or legal barriers to foreign workers accessing domestic grievance procedures.

## PROPOSAL #3 – OPTION B | Requirements 4-6 mandatory for high-risk FIPs

4. **FIPs with a significant foreign migrant workforce (25% or more of fishers are not citizens of the vessel's flag state) on vessels flagged to states linked with forced labor in the fishing sector and/or IUU fishing**, defined as any one of the following:
- a. Vessels flagged to a state listed on the most recent U.S. Department of Labor's [List of Goods Produced by Child Labor or Forced Labor](#) as having forced labor in its fishing fleet.
  - b. Vessels flagged to a state listed as Tier 2 Watchlist or Tier 3 in the most recent U.S. Department of State's [Trafficking in Persons Report](#) and which are cited there for human trafficking in the fishing industry.
  - c. Vessels flagged to a state with a [yellow or red card](#) from the European Commission for IUU fishing.
  - d. Vessels flagged to a state scoring 2.5 or higher in prevalence of IUU fishing according to the [IUU Fishing Index](#).
5. **Where the above characteristics are not known (i.e., where the FIP lead does not have enough information to determine if the fishery is high-risk).**

**Currently includes:**  
Burma, China, Ghana, Indonesia, Thailand, Taiwan

**Currently includes:**  
Brunei, Myanmar, Burundi, Cambodia, China, Fiji, Guinea, Ireland, Maldives, Mauritania, Pakistan, Papua New Guinea, Seychelles, Uganda

**Yellow currently includes:**  
Kiribati, Panama, Ecuador, Trinidad & Tobago, Saint Kitts & Nevis, Liberia, Sierra Leone, Vietnam  
**Red currently includes:**  
Cambodia, Comoros, Saint Vincent & Grenadines

**Currently includes:**  
China, Taiwan, Panama, Spain, Republic of Korea (South Korea), Russia, India

## PROPOSAL #3 – OPTION B | Requirements 4-6 mandatory for high-risk FIPs

### *Determining if FIPs are high-risk*

FIPs will provide information about whether their FIP meets any of the high-risk criteria as part of their next report (six-month or annual report, whichever comes first) after the policy is released in March 2021. The FisheryProgress social analyst will review the information and evidence (if applicable) to determine whether the FIP meets any of the high-risk criteria.

If the FIP is considered high risk, it will have one year from the report date to have a qualified party complete a full human rights risk assessment.

- a. **If no red issues are identified** in the assessment, the FIP does not need to develop a workplan. Its next human rights risk assessment must be completed in three years.
- b. **If a red performance level is identified for any topic**, the FIP must develop a workplan based on the findings of the risk assessment that includes, at minimum, the red issues identified. Then the FIP must:
  - i. Self-report on progress implementing the workplan every six months.
  - ii. Engage a qualified party to conduct an annual assessment, focused only on issues in which the FIP is scoring at a red level. The qualified party will assess whether the FIP is implementing its workplan and achieving desired improvements, and work with the FIP to make adjustments to the workplan as needed. Indicator scores could also be improved as part of this process.
  - iii. Complete a full human rights risk assessment of all elements in the Code of Conduct every three years.



#### **Qualified party**

Pg. 15 of the [original draft policy](#) outlined FisheryProgress' criteria for qualifications for completing the human rights risk assessment.

# PROPOSAL #4 – ALLEGATIONS

## **Feedback on Allegations**

Feedback in the first round of stakeholder engagement raised two concerns: publicizing an allegation before a full investigation may have market implications for the FIP (even if the allegation proves to be unfounded) and creates the risk of false allegations; and only accepting allegations in English may cause barriers for those reporting or investigating allegations.

## **Proposed Changes to Allegations**

Based on feedback received, we are proposing two changes to the allegations procedure:

- 1. The public Allegations Case Tracker will only list cases where the Allegation Panel has determined that there is sufficient evidence a violation did occur, or that are already in the public domain.** Cases will be logged and updated on the case tracker only once the Allegation Panel has determined that there likely was a violation. For cases already in the public domain, for instance where legal action is being taken or where media articles or NGO reports have been published, the case tracker will be updated so that stakeholders know that FisheryProgress is investigating the matter, but it will only include publicly available information.
- 2. Allow allegations to be brought in any language,** rather than only in English.



### **Stakeholder Feedback**

*“Having an allegation logged on the Allegation Case Tracker would have negative impacts on a fishery and a case file should only be opened if the allegation came from a credible party and was supported by credible evidence.” – Industry*

*“Only allowing allegations in English might discourage some groups.” – NGO*



### **Allegations Case Tracker**

Once the social policy is finalized and published, FisheryProgress will update the website's data entry and display features to accommodate reporting under the social policy. The Allegations Case Tracker will be part of this development process and, when complete, will be publicly available on FisheryProgress.



### **Allegation Panel**

For each accepted allegation, FisheryProgress will nominate an Allegation Panel of at least three and no more than five independent experts to consider the case. Panel members shall be free of conflict of interest to the related case.

# CLARIFICATION – GRIEVANCE MECHANISMS

## ***Feedback on the Grievance Mechanisms Requirement***

The draft policy requires that FIP leads ensure that workers are informed of their rights and have access to grievance mechanisms that are secure, anonymous, confidential, and independent, and include strong protections against retaliation. During the feedback period, some FIP leads raised concerns about being able to implement this part of the policy. Most vessel owners do not have a grievance mechanism in place, and some FIP leads did not feel confident that they could require companies to institute such systems. FIP implementers themselves might not have the expertise to manage grievances, and since the FIP is often temporary, any grievance process the FIP manages directly is not a long-term solution for fishers.

## ***Clarification on the Grievance Mechanism Requirement***

Best practice is that fishers have access to different layers of grievance mechanisms, including directly at the workplace or other options, to seek grievance through. In many countries there are systems run by trade unions, NGOs, industry groups (including buyers), or government platforms through which workers can seek remedy.

The policy does not require the FIP lead themselves to have a grievance mechanism. Rather, FIPs must ensure that fishers have access to, and know how to use, at least one adequate grievance mechanism – either through the fishing company or other systems noted above.

If there are no adequate systems in place, then FisheryProgress can help FIP leads with guidance to developing grievance mechanisms for fishers, as part of the supporting and training materials we develop as part of our social policy. FIP leads will need to include the development of a mechanism in their workplans. Again, this does not mean the FIP itself must “own” the grievance mechanism but rather plan to work with supply chain companies or local worker organizations to establish one.



### **Grievance mechanisms**

A formal, legal or non-legal complaint process that can be used by individuals, workers, communities and/or civil society organizations that are being negatively affected by certain business activities and operations. (Source: [SOMO](#)).



# CLARIFICATION – GRIEVANCE MECHANISMS

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## *Proposed Support for Grievance Mechanisms*

FisheryProgress will support FIPs to implement this requirement by:

- 1. Mapping out the third-party grievance mechanisms** – for example run by trade unions, fisher associations, NGOs, industry associations, multi-stakeholder bodies or government – available in the main countries hosting FIPs, and provide lists and contact details to FIP leads.
- 2. Sharing guidance and provide training for FIP leads** to set up their own grievance systems if they need or want to, and/or for them to help employers set up adequate workplace grievance mechanisms.
- 3. Creating multi-language templates for posters and brochures** that explain fishers' rights under the Human Rights Code of Conduct and who they can contact if their rights are abused, for FIPs to display and distribute in ports, at landing sites, and during training events.
- 4. Providing case study examples** of proper multi-level grievance mechanisms in fisheries.

## APPENDIX A | Updated Human Rights Code of Conduct

1. There is no discrimination, abuse, or harassment.		
<p><i>On large vessels:</i></p> <ul style="list-style-type: none"> <li>• There is no corporal punishment, mental or physical coercion, verbal abuse, gender-based violence, sexual harassment, or any other form of harassment, including excessive or abusive disciplinary action.</li> <li>• Migrant status is not used as a threat or tool of coercion.</li> <li>• Workers/fishers' families or community members are not threatened by employers, buyers, labor brokers, or organized crime.</li> <li>• There is no forced drug use; labor and/or product is not compensated for with drugs.</li> <li>• Fisheries observers are able to conduct duties free from assault, harassment, interference, or bribery.</li> </ul>	<p><i>On small vessels:</i></p> <ul style="list-style-type: none"> <li>• Same.</li> </ul>	<p><i>Assess using SRAT indicator(s):</i> 1.1.1</p>
2. There is no human trafficking or forced labor.		
<p><i>On large vessels:</i></p> <ul style="list-style-type: none"> <li>• There are no indicators of forced labor violations or evidence of debt bondage, for instance excessive overtime, earnings are paid more than 30 days after work is performed, deductions are paid to labor brokers, passport retention, non-payment of wages, high-cost deductions for onboard provisions, or coercive recruitment.</li> <li>• Fishers are permitted to leave the vessel when in port.</li> <li>• Fishers are not required to pay a deposit at the beginning of employment to prevent them absconding.</li> <li>• Workers/fishers have the legal right to work and proper documentation/visas, and when applicable, the fishery/farm is only using legally registered recruiters.</li> <li>• The FIP has a forced labor policy in place commensurate with the risk of forced labor occurring in the country according to the Seafood Slavery Risk Tool or FishSource risk ratings.</li> </ul>	<p><i>On small vessels:</i></p> <ul style="list-style-type: none"> <li>• If the fisher is paying off debt to the cooperative, association, buyer, or permit holder (for equipment, permit fees, fuel costs, ice, etc.), they keep most of their income and only a small percentage is used to pay back their debts.</li> <li>• If the fisher is paying off debt to the cooperative, association, buyer, or permit holder, their debt has remained stable or decreased over time proportional to their income.</li> <li>• The fisher is allowed to witness the product being weighed or graded to calculate their income.</li> </ul>	<p><i>Assess using SRAT indicator(s):</i> 1.1.2a (industrial) 1.1.2b (small-scale)</p>

## APPENDIX A | Updated Human Rights Code of Conduct

3. There is no child labor.		
<p><i>On large vessels:</i></p> <ul style="list-style-type: none"> <li>There is no evidence of hazardous child labor, defined as: <i>Work which exposes children to physical, psychological or sexual abuse; work underground, under water, at dangerous heights or in confined spaces; work with dangerous machinery, equipment and tools, or which involves the manual handling or transport of heavy loads; work in an unhealthy environment which may, for example, expose children to hazardous substances, agents or processes, or to temperatures, noise levels, or vibrations damaging to their health; work under particularly difficult conditions such as work for long hours or during the night or work where the child is unreasonably confined to the premises of the employer (ILO C190).</i></li> <li>Work done by children is legal and appropriate for their development.</li> <li>Children below the legal age of employment are not employed as waged workers.</li> <li>Children under the age of 16 are not employed as waged workers on board a fishing vessel, unless the competent authority has authorized a minimum age of 15 for persons who are (a) no longer subject to compulsory schooling as provided by national legislation, and who are engaged in vocational training in fishing or (b) performing light work during school holidays (ILO C188).</li> <li>Children below the legal age of employment may work alongside family members only if this does not interfere with schooling, and on tasks which do not harm their health, safety, or morals.</li> <li>Children do not work at night.</li> <li>The FIP has a child labor policy in place commensurate with the risk of child labor occurring in the country according to the Seafood Slavery Risk Tool.</li> </ul>	<p><i>On small vessels:</i></p> <ul style="list-style-type: none"> <li>Same.</li> </ul>	<p><i>Assess using SRAT indicator(s):</i> 1.1.3</p>

## APPENDIX A | Updated Human Rights Code of Conduct

4. Freedom of association and the right to collective bargaining are respected.		
<p><i>For large vessels:</i></p> <ul style="list-style-type: none"> <li>Fishers are free to form worker organizations, including trade unions, to advocate for and protect their rights, and have the right to decide their own structure, policies, programs, priorities, etc., without employer interference. If the country restricts trade union rights, the company/fishery has provided a way for workers/fishers to organize and express grievances.</li> <li>Human rights defenders are not actively suppressed.</li> <li>There is no discrimination against fishers who are members or leaders of organizations, unions, or cooperatives, and fishers are not dismissed for exercising their right to strike.</li> </ul>	<p><i>For small vessels:</i></p> <ul style="list-style-type: none"> <li>Same.</li> </ul>	<p>Assess using SRAT indicator(s): 1.1.4</p>
5. Earnings and benefits are decent, transparent, and stable.		
<p><i>For large vessels:</i></p> <ul style="list-style-type: none"> <li>There is equal remuneration for work of equal value for men and women.</li> <li>Wage levels and benefits, including overtime wages, meet the minimum legal requirements.</li> <li>Wages paid to fishers are what was promised at the time of employment, are not withheld as a form of discipline, do not contain illegal deductions, and are paid on time or directly to the fisher.</li> <li>Fishers do not go longer than one month without being paid.</li> <li>Employers legally contract employees.</li> <li>Workers are aware of how their earnings or deductions are calculated and their rights to benefits, are allowed to witness procedures used to determine earnings (weighing, grading), and only sign contracts they understand with provisions for different languages or illiteracy.</li> <li>Workers/fishers receive wage slips or written receipts with deductions itemized.</li> </ul>	<p><i>For small vessels:</i></p> <ul style="list-style-type: none"> <li>Not applicable.</li> </ul>	<p>Assess using SRAT indicator(s): 1.1.5</p>

## APPENDIX A | Updated Human Rights Code of Conduct

6. Working hours are not excessive.		
<p><i>For large vessels:</i></p> <ul style="list-style-type: none"> <li>Working hours meet the legal minimum requirements.</li> <li>Workers have at least 10 hours of rest in a 24-hour period and at least 77 hours in a seven-day period.</li> <li>There is a mechanism in place for workers/fishers to record hours worked.</li> <li>Overtime is voluntary.</li> </ul>	<p><i>For small vessels:</i></p> <ul style="list-style-type: none"> <li>Not applicable.</li> </ul>	<p>Assess using SRAT indicator(s):</p> <p>1.1.6</p>
7. Workers and fishermen have access to basic services.		
<p><i>For large vessels:</i></p> <ul style="list-style-type: none"> <li>Sleeping quarters have adequate fire prevention and air ventilation, meet legal requirements, and meet reasonable levels of safety, decency, hygiene, and comfort.</li> <li>Sanitary facilities (appropriate to vessel size) with adequate privacy are provided.</li> <li>Potable water is accessible to workers/fishers.</li> <li>Workers/fishers living on board have access to adequate and sanitary food at fair prices.</li> <li>Fisheries observers are provided adequate accommodation appropriate to the size of the monitored entity and equivalent to that of the officers of the monitored entity.</li> </ul>	<p><i>For small vessels:</i></p> <ul style="list-style-type: none"> <li>Not applicable.</li> </ul>	<p>Assess using SRAT indicator(s):</p> <p>1.1.7a (live-aboard vessels)</p>

## APPENDIX A | Updated Human Rights Code of Conduct

8. The working environment is safe, and there is an adequate medical response for workplace injuries.		
<p><i>For large vessels:</i></p> <ul style="list-style-type: none"> <li>• There is a radio on board for vessels over 24 meters, and fisheries observers are able to access it.</li> <li>• Adequate personal protective equipment (PPE) (e.g., lifejackets) is provided on board at no cost (unless self-employed).</li> <li>• Fishers are trained in health and safety procedures and on proper use of PPE and safe operation of any equipment they use (unless self-employed).</li> <li>• Vessel complies with local/national safety and health regulations.</li> <li>• Adequate medical supplies are available (i.e., there is a first-aid kit).</li> <li>• On large vessels, there is a trained first aid responder.</li> <li>• For vessels on trips longer than three days, fishers have a valid medical certificate attesting to their fitness to work.</li> <li>• Workers are provided with medical care for workplace injuries and are repatriated if necessary at employer’s expense.</li> </ul>	<p><i>For small vessels:</i></p> <ul style="list-style-type: none"> <li>• Adequate personal protective equipment (e.g., lifejackets) is provided on board at no cost (unless self-employed).</li> <li>• Fishers are trained in health and safety procedures and on proper use of PPE and safe operation of any equipment they use (unless self-employed).</li> <li>• Vessel complies with local/national safety and health regulations.</li> <li>• Adequate medical supplies are available (i.e., there is a first-aid kit).</li> <li>• Workers are provided with medical care for workplace injuries and are repatriated if necessary at employer’s expense.</li> </ul>	<p><i>Assess using SRAT indicator(s):</i> 1.1.8 and 1.1.9</p>
9. For fisheries which operate in or near a customary resource use area: rights and access to resources are respected, fairly allocated, and respectful of collective and indigenous rights.		
<p><i>For industrial fisheries operating in or near customary use areas:</i></p> <ul style="list-style-type: none"> <li>• The fishery observes the legal and customary rights of local people, does not negatively impact adjacent communities, land, and/or water, or restrict access to vital community resources without community approval.</li> <li>• Fishers are not denied or revoked of fishing rights due to discrimination.</li> <li>• The fishery is not designated in an area legitimately claimed by communities without their documented Free, Prior, and Informed Consent.</li> </ul>	<p><i>For artisanal fisheries operating in or near customary use areas:</i></p> <ul style="list-style-type: none"> <li>• Same.</li> </ul>	<p><i>Assess using SRAT indicator(s):</i> 1.2.1</p>

## APPENDIX B | *The Social Responsibility Assessment Tool*

**Purpose.** The Social Responsibility Assessment Tool (SRAT) for the Seafood Sector is a diagnostic, benchmarking, or risk-assessment tool for conducting human rights due diligence in seafood supply chains – to assess risk of social issues, to identify areas in need of improvement, and to inform the development of a FIP workplan that includes a social element. The SRAT is not a certification – it incorporates existing resources in social responsibility certification, in case the FIP wants to proceed toward certification.

**History.** The SRAT was co-produced, and thus co-owned; more than two dozen organizations have contributed over the course of the development phase, including many organizations comprising the Conservation Alliance, human and labor rights organizations, university scholars, intergovernmental agencies, and industry.

**Principles/Indicators.** The SRAT is built on the three principles of the “The Monterey Framework” – a shared definition of social responsibility inclusive of: 1) protecting human rights, dignity, and access to resources; 2) ensuring equality and equitable opportunity to benefit; and 3) improving food, nutrition, and livelihood security. The indicators and scoring guideposts used to build this tool are a collation of all the existing certification and ratings community of practice for social issues in seafood. The SRAT integrates all relevant ILO Conventions and international protocols and standards.

**Using the Assessment.** Critical to the use of the assessment tool is that the assessment team must have local representation and social science or human rights expertise. Data collection may involve secondary data, primary data, or both, and thus will require time in the field interacting with the fishery and the workers. Ultimately, data gathered during the initial assessment will inform the development of the improvement plans with local stakeholders for driving social change. This resource is to be used as a sister tool to a FIP’s needs assessment or pre-assessment, and is relevant in the context of industrial and small-scale fisheries.

**Learn More.** The SRAT is undergoing some updates that will be ready by the end of 2020 and which will be aligned with the FisheryProgress social policy. Access the current version of the SRAT [here](#), or view a webinar about the tool [here](#).



**SOCIAL RESPONSIBILITY ASSESSMENT TOOL  
FOR THE SEAFOOD SECTOR**

