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Summary of Changes to the FisheryProgress Human Rights and Social Responsibility Policy

Sept. 22, 2022

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Introduction

The following document outlines a set of changes FisheryProgress will make to its [Human Rights and Social Responsibility Policy](#), effective Sept. 22, 2022 through the end of 2025. These changes will be integrated into the policy document and FisheryProgress' [FIP Review Guidelines](#) by the end of 2022. If you have any questions on these changes, please email info@fisheryprogress.org.

Why we're making these changes

Learning year. We intended the first year of implementing the social policy to be a learning year where we would continue to gather feedback from FIPs and other FisheryProgress stakeholders. Approximately 30 FIPs (just shy of 20% of FIPs reporting on FisheryProgress) participated in our early adopter program, working to meet policy requirements ahead of deadlines and sharing feedback with our team. Now, all active FIPs have met at least one requirement – the self-evaluation of risk criteria – and are working toward meeting the vessel list and grievance mechanism requirements.

New feedback. Prior to releasing the policy, we conducted extensive stakeholder engagement and made substantial changes to the draft policy due to the feedback we received. Ultimately, we felt we landed in a place that a majority of the community supported. However, as FIPs have begun to implement the policy, the reality of the challenges of doing so has become clearer.

Key themes in the feedback we have received since we launched the policy are:

- FIPs are not receiving strong demand from buyers to meet social policy requirements. In particular, those that are within 6-12 months of entering MSC full assessment lack incentives for meeting social policy requirements.
- Many FIPs are working hard to meet the social policy requirements, but they are struggling to raise funds, build technical expertise and capacity, secure the time of qualified consultants, etc.
- Some FIPs believe the SRA assessment is duplicative of existing audits or certifications or unnecessary when recent, credible research has already identified priority social issues for the FIP to address.
- Some FIPs are deeply concerned about how FisheryProgress will handle allegations of human rights abuses in FIPs.

Rationale for changes. All of this has caused FisheryProgress to believe that:

- The FIP community needs more time and support to meet these requirements, including funding, capacity building, and increased market pressure; and
- Without providing that time and support, we run the risk of severe FIP attrition from FisheryProgress, which could be a significant step backward for the sustainable seafood movement.

As a result, we will make the following changes effective immediately through the end of 2025:

- Offer 12-month extensions for any core policy requirements FIPs have not yet met.
- Offer three pathways for FIPs that meet the risk criteria to complete the SRA assessment and workplan requirements.
- Handle allegations of forced labor, child labor, and human trafficking using our existing policy requirements and appeals process, rather than instituting a separate allegations procedure.

Each of these changes are detailed below along with the steps that FisheryProgress will take to communicate with FisheryProgress users about the status of FIP efforts to comply with social requirements.

12-month extensions for five core policy requirements

There are five core social policy requirements for all FIPs reporting on FisheryProgress:

- 1.1 Demonstrate there is a public policy statement outlining a commitment to human rights and social responsibility
- 1.2 Provide information about the vessels or fishers included in the FIP.
- 1.3 Undertake best efforts to make fishers aware of their rights.
- 1.4 Demonstrate there is a grievance mechanism available to all fishers in the FIP.
- 1.5 Complete a self-evaluation against the FisheryProgress criteria for increased risk of forced labor and human trafficking.

FIPs currently reporting on FisheryProgress that need more time to fulfill unmet policy requirements may complete a form to request a 12-month extension¹. FIPs must provide a rationale for their extension request. The rationale includes two components:

¹ New FIPs may request extensions for requirements 1.1-1.4 only; the self-evaluation must be completed in order for a new FIP to become active on FisheryProgress.

1. **A reason for their extension request.**
2. **A brief list of actions** they will undertake to work toward meeting the requirements.

FisheryProgress will operate with maximum flexibility in granting 12-month extensions, and will make extension rationales visible on FIP profiles. After the first 12-month extension, additional extensions may be considered for exceptional circumstances based on the FIP's submission of an updated rationale.

Three pathways for risk assessment and workplan requirements

FisheryProgress remains committed to FIPs reporting on human rights and social responsibility risks and actions to address them. However, for most FIPs this is new territory or requires a change in current practice. We will provide more time and flexibility through 2025 to ensure FIPs can continue reporting on FisheryProgress while they make this transition.

During this time, FIPs will have three pathways available to them:

1. **Verified SRA assessment and workplan.** FIPs that complete the SRA assessment and workplan on time (or after receiving an extension), will have their documentation verified by the FisheryProgress review team, will receive recognition on their profiles, and will be promoted through FisheryProgress' communication channels.
2. **12-month extension.** FIPs that need more time to meet the SRA assessment and workplan requirements may complete a form to request a 12-month extension. FIPs must provide a rationale for their extension request. The rationale includes two components:
 1. **A reason for their extension request.**
 2. **A brief list of actions** they will undertake to work toward meeting the requirements.

FisheryProgress will operate with maximum flexibility in granting 12-month extensions, and will make extension rationales visible on FIP profiles. After the first

12-month extension, additional extensions may be considered for exceptional circumstances based on the FIP's submission of an updated rationale.

3. **Unverified assessment and workplan.** Through 2025, FIPs that have completed an alternative social assessment and related workplan may delay completing an SRA assessment and workplan. Examples of alternative assessments may include social risk assessments, pre-assessments or audits as part of a social standard or certification program, or recent research studies. To use this pathway, FIPs must do three things:
 1. **Upload a summary of alternative assessment findings².**
 2. **Upload a related workplan** or corrective action plan.
 3. **Provide a high-level progress report** each year as part of their annual FisheryProgress reporting.

The assessment, workplan, and progress reports will be posted publicly on FIP profiles, along with a disclaimer noting that FisheryProgress has not reviewed or verified the documents.

Approach to allegations of human rights abuses

FisheryProgress will not implement a full-fledged allegations procedure between now and the end of 2025. Over the past year, it has become clear that developing an allegations procedure is incredibly complex - from managing legal risks and cost burdens to balancing rigor and capacity. FIPs are undertaking a lot of new work to comply with our policy, and we understand that they need certainty about our procedures. We also recognize the seriousness of human rights abuses in FIPs and the need for transparency about actions FIPs are taking to address them.

Through 2025, rather than utilize a separate approach, we will use our existing policy requirements and appeals process when allegations of forced labor, human trafficking, or child labor arise. FisheryProgress currently requires all FIPs to complete a

² A full third-party audit or pre-assessment for a social certification or standard, or other risk assessment report that includes information on areas of risk, may be submitted if a FIP prefers not to create a summary.

self-evaluation against criteria for increased risk of forced labor, child labor, and human trafficking. We will update criterion #4 of the self-evaluation to read: “The FIP has a reported incident of forced labor, human trafficking, or child labor within the past two years.”

If FisheryProgress becomes aware of a reported incident of forced labor, human trafficking, or child labor that aligns with our requirements for criterion #4, it will trigger one of two actions:

1. The FIP must update its self-evaluation within 30 days to acknowledge the reported incident of forced labor, human trafficking, or child labor.
2. If the FIP declines to update its self-evaluation within 30 days to acknowledge the reported incident, a third party or FisheryProgress may submit an appeal on the grounds of “evidence of inaccurate data posted on the site.” If the appeals process determines that inaccurate data is posted on the site, the FIP will be required to update its self-evaluation to acknowledge the reported incident within 30 days if it wishes to remain active on FisheryProgress.

FIPs with an acknowledged reported incident must complete the SRA assessment and workplan or provide documentation of an alternative assessment within 12 months. No extensions will be granted.

FisheryProgress will not publish the details of reported incidents on the website due to legal liability issues but will allow FIPs to provide an optional explanation of any reported incidents of forced labor, human trafficking, or child labor on their profiles.

We will clarify our definition of what qualifies as a reported incident of forced labor, human trafficking, and child labor as follows:

1. A reported incident must be documented in a **credible, public report**.
 - **Credible** means the report is from a public or private entity that employs ethical and impartial investigative standards based on primary sources and rigorous verification. Examples of these entities include reputable international or local non-governmental or civil society organizations, reputable international or local media outlets, and government agencies.

- **Public** means reports that are in the public domain, whether published online or in hard copy.
2. We will define **forced labor, human trafficking, and child labor** as follows (adapted from Social Responsibility Assessment Tool):
- **Forced labor.** Work or service that is extracted from any person under the menace of any penalty for which a person has not offered themselves voluntarily or for which such work or service is demanded as a repayment of debt. “Penalty” may include, but is not limited to, monetary sanctions, physical punishment, intimidation, punishment of family members, or the loss of rights and privileges or restriction of movement (e.g., withholding of identity documents).
 - **Human trafficking.** The recruitment, transportation, harboring, or receipt of persons by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power, or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation.
 - **Child labor.** Work that is inappropriate for a child’s age or illegal under the local legal minimum age, affects their education, or, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety, or morals of children.
3. A reported incident will be considered **connected to a FIP** if the one or more of the following conditions are met:

For FIPs with vessels	<ul style="list-style-type: none"> ● A vessel implicated in the report is listed in the FIP’s vessel list; OR ● If there is no vessel list available, the report implicates a listed participant in the FIP for an incident in the same fishery (species targeted, gear types, geography, vessel flags) as the FIP.
For FIPs with no vessels	<ul style="list-style-type: none"> ● The reported incident occurred in the

	<p>same fishery; AND</p> <ul style="list-style-type: none"> On-shore fishers described in the report share similar characteristics with fishers described in the FIP’s vessel and fisher information template.
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Increased transparency and communication with FisheryProgress users

Users – especially seafood buyers – rely on FisheryProgress for clear and consistent information they can use to assess whether FIPs meet their sourcing policies. To make this easier, FisheryProgress will add visual labels to FIP profiles to convey the status of their efforts to meet the SRA assessment and workplan requirements. We will determine the final label text and design later this year for the following statuses:

Status	Explanation
1. SRA assessment and workplan not required	For FIPs that have not met the risk criteria and are consequently not required to complete the SRA assessment and workplan
2. SRA assessment and workplan due on DATE	For FIPs that have met the risk criteria and must complete the SRA assessment and workplan within 12 months
3. Extension SRA assessment and workplan due on DATE	For FIPs that have received a 12-month extension to complete the SRA assessment and workplan
4. Verified SRA assessment and workplan	For FIPs that have completed the SRA assessment and workplan, whether required or voluntary
5. Unverified assessment and workplan	For FIPs that have submitted documentation of an alternative assessment and workplan
6. Reported incident	<p>An additional “reported incident” label will be added if the FIP has acknowledged a reported incident of forced labor, human trafficking, or child labor. For example:</p> <ul style="list-style-type: none"> Reported incident SRA assessment and

	<p>workplan due on DATE</p> <ul style="list-style-type: none"> • Reported incident Unverified assessment and workplan <p>The generic label will not describe any specifics about the reported incident. FIPs may provide an optional explanation of the reported incident on their profiles.</p>
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FisheryProgress will also use the full range of communication channels available, including Follow This FIP, newsletter and social media, and direct communications, to communicate with buyers about these statuses.

Next steps

These changes will be effective as of Sept. 22, 2022 through the end of 2025. FIPs will be able to request 12-month extensions or submit documentation of alternative assessment approaches via the website beginning on Nov. 1, 2022. If FIPs wish to take either of these steps to meet reporting deadlines prior to Nov. 1, they may contact their assigned review team representative. These changes will be fully integrated in the formal [Human Rights and Social Responsibility Policy](#) and FisheryProgress [FIP Review Guidelines](#) by the end of 2022.

We will continue to welcome feedback on all aspects of our policy, including these changes, at any time in the next three years. During this time, we will work in collaboration with the broader sustainable seafood community to strengthen buyer demand for social responsibility, as well as to build FIP capacity and identify and promote funding opportunities.

We will also implement a formal monitoring and evaluation plan in partnership with an external consultant during the next two years. A key topic will be understanding the value and impact of using the SRA and alternative approaches to assess and address areas of high risk in FIPs. These learnings will inform our planned major revision to the policy in 2025.