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## Human Rights and Social Responsibility Policy Summary of Changes Version 1.1

Release Date: Dec. 16, 2022

In May 2021, FishChoice released the [FisheryProgress Human Rights and Social Responsibility \(HRSR\) Policy](#) along with a new set of features on the FisheryProgress website to allow fishery improvement projects (FIPs) to publicly report on social performance. We launched the policy as a starting point, recognizing that there is a lot that FisheryProgress and the community will learn as we begin to embed a social responsibility focus into FIPs.

We intended the first year of implementing this policy to be a learning year, where we would continue to gather feedback from FIPs and other FisheryProgress stakeholders. We are grateful for the feedback from FIPs who have spent the last year working to meet the policy requirements, including those who signed up as [early adopters](#). We would also like to thank the many other FIP stakeholders who have continued to work with us to understand and improve the policy. As of September 2022, all active FIPs had met at least one requirement – the self-evaluation of risk criteria – and are working toward meeting the vessel list and grievance mechanism requirements.

As a result of these conversations and learnings, we announced two updates to the policy: a [March 2022 Policy Amendment](#) and a [September 2022 announcement of changes](#).

### What We've Learned So Far

The first 18 months of the HRSR Policy's implementation have been critical to help us understand the challenges that exist for FIPs addressing social responsibility. One of the main challenges we aimed to address via the March 2022 Policy Amendment was the requirement for FIPs to sign the FisheryProgress Human Rights Code of Conduct (Requirement 1.1). There were concerns that the code of conduct may have given users false assurances about FIPs' social responsibility and that it was duplicative for FIP participants who had already made public commitments. The changes outlined in the March 2022 amendment were intended to address those issues as well as increase FIP ownership over the responsibility to respect human and labor rights. Our goals were to improve the HRSR Policy's impact by better highlighting the work that FIPs were already doing and by increasing flexibility to allow FIPs to design or utilize existing commitments that reflect their unique contexts.

Continued learning from the policy's implementation and more recent feedback from additional stakeholder consultation drove further changes, announced in September 2022. Key themes included:

- FIPs were not receiving strong demand from buyers to meet social policy requirements. In particular, those that were within six to 12 months of entering MSC full assessment lacked incentives for meeting HRSR Policy requirements.
- Many FIPs were working hard to meet the HRSR Policy requirements, but they were struggling to raise funds, build technical expertise and capacity, secure the time of qualified consultants, etc.
- Some FIPs believed the Social Responsibility Assessment (SRA) was duplicative of existing audits or certifications or unnecessary when recent, credible research had already identified priority social issues for the FIP to address.
- Some FIPs were deeply concerned about how FisheryProgress would handle allegations of human rights abuses in FIPs.

All of that 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. The changes announced in September focused on offering FIPs additional flexibility in meeting requirements and extended timelines to come into compliance.

## Overview of Changes to the HRSR Policy and Associated Approach

### Summary of HRSR Policy Changes

In the latest version of the [HRSR Policy \(version 1.1\)](#), we integrated the changes from the March and September 2022 updates along with other minor updates to improve the policy's clarity and readability. The following table provides more details on the changes.

#### Integration of March 2022 Amendment of the Social Policy

Version 1.1 fully integrates the amendment to Version 1.0 throughout the policy. The changes in the amendment, which are detailed below, were effective as of March 1, 2022.

- Amended two subsections within the "Overview": The phased implementation timeline was revised, and references to a process for handling allegations of human rights abuses were removed.
- Revised Requirement 1.1 in its entirety. In lieu of requiring FIPs to sign the FisheryProgress Human Rights Code of Conduct, the revised requirement calls for FIPs to demonstrate they have a public policy statement outlining a commitment to respect human and labor rights and to provide a description of their policy statement via a template. Edits were made throughout the policy to reflect that.
- Revised Requirement 1.3 in its entirety. The revised requirement calls for FIPs to make fishers aware of the FIP's policy statement (see revised Requirement 1.1) and to provide required information via a template.

## Integration of September 2022 Announcement of Changes to the Social Policy

Version 1.1 fully integrates throughout the policy the changes released in the September announcement. The changes in the announcement, which are detailed below, were effective as of Sept. 22, 2022.

- Revised guidance for requesting extensions for meeting initial policy requirements, enabling all FIPs to have the opportunity to apply for a 12-month extension for unmet core policy requirements.
- Updated information on FisheryProgress' processes for addressing concerns about FIP information, which was recently revised and takes the place of a proposed allegations procedure.
- Revised Risk Criterion #4 in Requirement 1.5 to improve understanding related to reported incidents, and the threshold of consideration of such incidents was changed from four years to two years.
- Component 2 was restructured and amended to provide alternate pathways for meeting the requirements:
  - Amended Requirement 2.1 to allow FIPs to provide an alternative risk assessment, and amended Requirement 2.2 to clarify reporting guidelines and deadlines for FIPs that provide one.
  - Integrated Requirement 2.3 into Requirement 2.2 as the progress reporting deadline.

## Additional Changes for Clarity and Readability

Version 1.1 includes additional changes to improve the policy's clarity and readability. The changes, which are detailed below, are effective starting on the policy's effective date.

- Clarified applicability and scope of the policy within the "Overview" and through addition of a subheading on "Applicability" for each requirement.
- Within the "Overview," updated language for clarity in subsections related to "Implementation Responsibility," the "Review Process," and "Reporting Deadlines" as well as added a new subsection on "Reporting Transparency."
- Within Requirement 1.1, simplified and clarified the approach to the FIP Policy Statement Template with intention to reduce the paperwork burden.
- Within Requirement 1.2, clarified when a Unique Vessel Identifier (UVI) must be provided as well as the definition of UVI.
- Within Requirement 1.4, updated language to clarify expectations related to grievance mechanisms and the self-review of the effectiveness of those mechanisms as a part of progress reporting.
- Within Requirement 1.5, clarified the definition of foreign migrant workforce, adapting for EU citizens.
- Within Requirement 2.1, clarified which templates may be used to conduct a Social Risk Assessment (SRA) and the need to ensure a representative sample is used in an SRA.
- Updated appendices: Incorporated new "Appendix B: Key Related Resources" with links to key associated resources on the FisheryProgress website, including the Glossary. Appendix B replaces old "Appendix D: Key Terms and Definitions." Appendix C on "Qualifications for Conducting Risk Assessments and Creating Social Workplans" was removed, and the relevant information is now linked to from within the Policy.

## **Updated Approach to Handling Reported Incidents of Forced Labor, Human Trafficking, and/or Child Labor**

Since the policy's launch, FisheryProgress has been working to identify the best approach for handling allegations of human rights abuses that balances risks – for FishChoice, FIPs, and workers – with the reality that we are a small organization with limited capacity and expertise to conduct on-the-ground investigations and a mission of transparency of information about FIPs.

As FisheryProgress began policy implementation, FishChoice conducted additional research and spoke to numerous human rights, industry, and FIP stakeholders to try to identify a credible yet realistic approach to handling serious allegations of human rights abuses. It has become clear that developing an allegations procedure is incredibly complex, involving managing legal risks and cost burdens and balancing rigor and capacity.

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. Our [Processes for Addressing Concerns About FIP Information on FisheryProgress](#) outlines the site's processes for addressing concerns about data and information published on the website – including reviewing reported incidents of forced labor, human trafficking, or child labor – and our conflict resolution and appeals process. More information is available [here](#).

### **Looking Forward**

Version 1.1 of the policy will be in effect until the planned major revision in 2025 is complete. We continue to welcome feedback on all aspects of our policy. During this time, we will implement a formal monitoring and evaluation plan to determine the policy's impact and effectiveness and work in collaboration with the broader sustainable seafood community to strengthen buyer demand for social responsibility, build FIP capacity, and identify and promote funding opportunities.