



**Build a responsible seafood  
supply chain step-by-step**

# RISE to the challenge:

How the Roadmap for Improving Seafood Ethics can help GTA members meet their social responsibility commitments

## **TODAY'S AGENDA:**

- Overview of FishWise & RISE
- My takeaways - GTA Progress Report
- Example Guidance Page: assessing risk
- Using Social Audits
- Engage Workers
- Build Capacity
- Using root cause analysis
- RISE 2.0
- Q&A

# The FishWise Approach



## ADVANCING PRIVATE SECTOR LEADERSHIP

Partnering with industry  
to set ambitious goals



## FURTHERING KNOWLEDGE

Traceability, counter-IUUF,  
social responsibility



## BUILDING COLLABORATION

Co-designing solutions  
and strategies



**Offering streamlined guidance and recommendations to help companies:**

- Evaluate their supply chain risks
- Understand and improve labor practices
- Engage workers and make improvements
- Communicate about their policies, expectations, and progress



## **The emergence of International trade and enforcement laws**

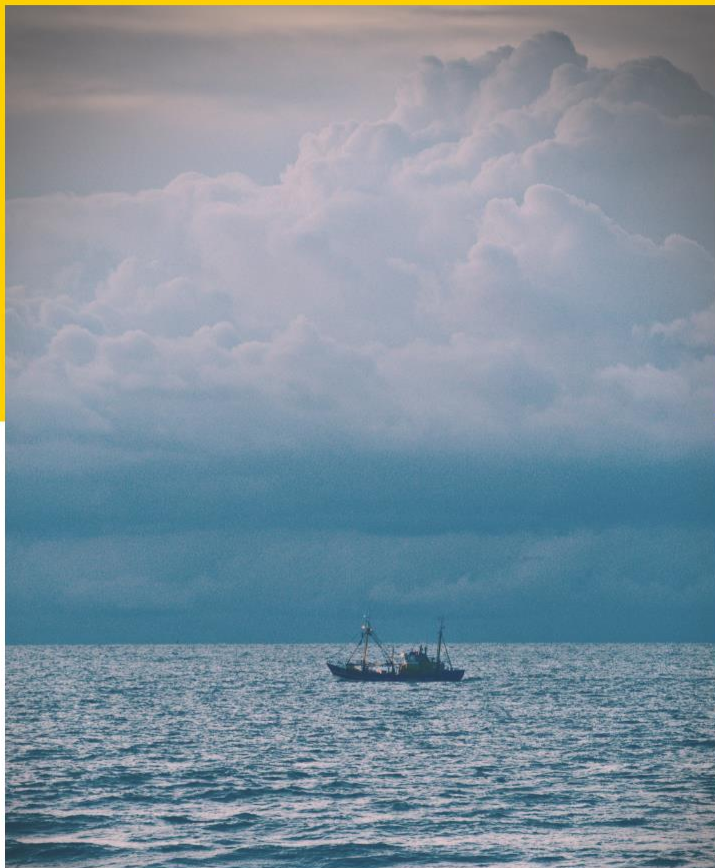
2010 - California Transparency in Supply Chains Act  
2014 - EU Non-Financial Reporting Directive  
2015 - UK Modern Slavery Act  
2015 - Trade Facilitation and Trade Enforcement Act  
2017 - French Corporate Duty of Vigilance Law  
2017 - Dutch Child Labor Due Diligence Bill  
2017 - Countering America's Adversaries Through Sanctions Act  
2018 - Australian Modern Slavery Act

## **Aligned with the Ruggie Principles**

- Make a public commitment to respect human rights
- Identify, prevent, mitigate, and account for, damage or damage caused to human rights
- Dispose of procedures for remedying the negative consequences on human rights they cause or contribute to causing.

## **Aligned with the fundamental ILO Conventions:**

- Freedom of Association and Protection of the Right to Organise Convention, 1948
- Right to Organise and Collective Bargaining Convention, 1949 (No. 98)
- Forced Labour Convention, 1930 (No. 29)
- Abolition of Forced Labour Convention, 1957 (No. 105)
- Minimum Age Convention, 1973 (No. 138)
- Worst Forms of Child Labour Convention, 1999 (No. 182)
- Equal Remuneration Convention, 1951 (No. 100)
- Discrimination (Employment and Occupation) Convention, 1958 (No. 111)
- Work in Fishing Convention, 2007 (No. 188)



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## ETHICAL CEILING



**RISE HELPS COMPANIES IDENTIFY THE  
LEGAL FLOOR, AND PROVIDES GUIDANCE  
TO BRIDGE THE GAP TOWARDS THE  
ETHICAL CEILING.**

## LEGAL FLOOR

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# Tuna 2020 Traceability Declaration Progress Report:

## 4.9 Social responsibility commitment

- 61% of companies believe their tuna supply chains are 'slave free', but only 17% have third-party certification to demonstrate this.
- The further the business is from the 'water' more uncertainty they have
- Companies have systems for meeting social responsibility commitment on land, but gap for at-sea verification.
- There is support for third-party audit standards on vessels.
- Top challenges regarding social responsibility commitments: External stakeholder resistance (14), Too complex (13), Little to no obstacles (11), Lack of personnel (6), Lack of funding (4)



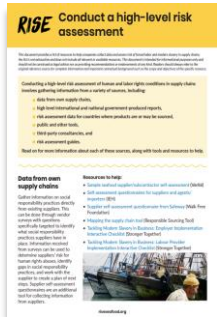
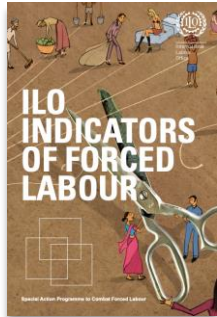
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# Example Guidance Page

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## Resources



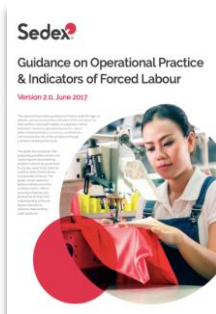
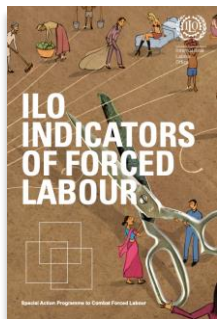
# Example: Best Practice Guidance for assessing risk

## Distributor, Retail, and Foodservice

- Conduct a risk assessment of suppliers using publicly available resources to determine high-risk suppliers.
- For suppliers identified as high-risk, collect data directly from suppliers and conduct a detailed risk assessment (Conduct this analysis for both current and prospective suppliers and when possible, conduct an onsite visit).
- Assess risk from recruitment at each tier of supply chains

RISE

## Resources



# Example: Best Practice Guidance for assessing risk

## Fishery & Processing

- Conduct an internal assessment of own company operations and recruitment processes to identify potential human and labor rights risks.
- Maintain updated documentation about working conditions and labor rights in supply chains to provide to upstream/downstream operations upon request.
- Maintain documentation demonstrating that workers are recruited ethically, without having paid illegal or unauthorized fees in order to attain employment.

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# Social Audit Guidance

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# Social audits

## **MYTH:**

Conducting social audits indicate that a company's social responsibility due diligence is complete, and that a company is safe from risk

## **TRUTH:**

Audits are one part of due diligence, which should also include mechanisms like worker voice and responsible recruitment practices

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# Social audits

## **MYTH:**

Social auditors always confirm how workers are experiencing their working conditions

## **TRUTH:**

Due to fear of reprisal, or lack of trust, workers often do not feel comfortable sharing sensitive information with auditors. Workers need other safe, voluntary channels for communicating about their working conditions

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# Guidance on social audits

RISE

Shift

Walk Free  
Foundation

Verité

**RISE** The role of social audits in a comprehensive due diligence program

**MYTH 4** Conducting social audits indicate that a company's social responsibility due diligence is complete, and that the company is safe from risk

**TRUTH** Audits should be used as one component of any company's due diligence program, which should also include mechanisms like worker voice and responsible recruitment practices

For many companies, social audits are seen as a first step verifying supply chain conditions, however they should be considered one component of a comprehensive due diligence program that includes robust worker voice and grievance channels.

**Q** What benefits do audits provide companies?

**A** Audits play a role in a company's overall due diligence program, and if done properly, can help surface problems. Social compliance audits can be particularly useful in assessing workplace health and safety conditions and document reviews. These are typically areas of assessment where workers receive little training and are sometimes unaware of their rights or legal requirements for workplaces.

**Q** In addition to audits, what other mechanisms should companies use to understand supply chain conditions?

**A** Social audits should be viewed as one tool for due diligence. Companies need to adopt a multi-pronged approach to identifying supply chain conditions.

Companies should implement worker voice channels, which includes gathering data from workers themselves, and establishing robust, safe, and effective grievance mechanisms which are free from reprisal for workers.

These additional processes are critical components for accurately understanding labor conditions and responding to potential labor violations in supply chains.

[riisecsd.org](https://riisecsd.org)

**Shift**  
Putting Principles into Practice

**From Audit to Innovation: Advancing Human Rights in Global Supply Chains**

August 2013

## TOOL 7: QUESTIONS TO ASK DURING AN AUDIT TO IDENTIFY LABOUR VIOLATIONS

The tables below list the type of questions companies should ask during an onsite inspection or audit. These questions can also be adapted to other supplier engagement and risk assessment processes. Tables 1-3 are indicators of involuntariness imposed on workers and table 4 refers to penalties to which workers may be subject.<sup>14</sup>

### TABLE 1: INDICATORS OF FORCED LABOUR THROUGH RECRUITMENT PRACTICES

- Were any workers born or extended into "debt" or bonded status?
- Were any workers deducted, confined during the recruitment process, or sold into this job?
- Were any workers recruited through some form of debt arrangement, such as an advance or loan, which they are working to pay off?
- At the time of recruitment, were any workers told they would be doing work of a different nature from the work they are currently performing?
- At the time of recruitment, were any workers promised certain working conditions, employment contract terms, living conditions, job locations, employers, or wages/salaries that are different from what they actually receiving?
- At the time of recruitment, were workers offered marriage as an incentive?

### TABLE 2: INDICATORS OF FORCED LABOUR THROUGH WORK AND LIFE UNDER DURESS

- Are any workers working excessive overtime beyond legal limits?
- Are any workers forced to work "on call" day or night?
- Does the employer restrict workers' freedom of movement or communication with others inside or outside the workplace?
- If workers' lodging is provided by the employer, are the living conditions degrading?
- Does the employer force workers to engage in illicit activities, to work for his/her private home or family, or to take addictive drugs?
- Does the employer impose or refuse worker's withdrawal through means such as falsifying work records, inflicting fines for goods that workers are obliged to purchase, reducing the value of goods or services provided by workers, charging excessive interest on loans or advances to workers, etc.?
- Are any workers dependent on the employer for housing, food, and other necessities?
- Do any workers have dependency relationships with the employer that go beyond the job, e.g., personal relationships, dependency on the employer for family members' employment, etc.?

### TABLE 3: INDICATORS OF FORCED LABOUR THROUGH IMPOSSIBILITY OF LEAVING

- Do any workers feel they do not have freedom to resign the job because of training other benefits they have received from the employer?
- Can workers terminate employment at any time, without penalty (except as provided by law)?
- Do any workers feel compelled to stay in the job because they are waiting for wages they are due?
- Are any workers working for an excessive or indefinite period of time in order to repay a debt or advance from the employer or recruiter?

## 3. Strengthening Assessments & Social Audits



Social audits are the primary tool used by brands to assess their own facilities and those of their suppliers for compliance with their corporate policies and codes, and to detect compliance violations and worker abuse. Most auditors, however, are ill-equipped to detect this abuse and to make the improvements in the recruitment, selection and hiring process necessary to address it effectively.

Human trafficking and recruiter-induced forced labor are complex issues. They are hidden, characterized by deception, and typically the result of complex pressures, abuses and exploitation levied not by a single employer but by a number of abusive actors at each stage of the recruitment, hiring and employment process, and at every level in the supply chain, up to and including the brand itself.

To account for this, brands need new assessment and compliance strategies. They need to audit not only themselves and their first-tier suppliers, but also the labor recruiters and other intermediaries that provide them with and/or manage workers on their behalf. They also need new and effective tools to assess and identify these new forms of abuse. At the same time, auditors also need to be fully trained. New tools, audit procedures and policies warrant new and better training on how to identify and address forced labor.

- Tools**
- Tool 1: Guidance For the Social Auditing of Forced Labor and Human Trafficking of Migrant Workers
  - Tool 2: Conducting Interviews with Labor Recruiters
  - Tool 3: Conducting Interviews with Managers
  - Tool 4: Conducting Interviews with Migrant Workers
  - Tool 5: Conducting a Review of Documentation

- Links**
- ILO - Combating Forced Labor: A Handbook for Employers and Business - Chapter 4: Checklist and Guidance for Assessing Compliance



# Guidance: Implement Worker voice tools

## RISE Understanding and verifying supply chain conditions through worker voice

### MYTH 2

Social auditors always confirm how workers are experiencing their working conditions

### TRUTH

Due to fear of reprisal, or lack of trust, workers often do not feel comfortable sharing sensitive information with auditors. Workers need other safe, voluntary channels for communicating about their working conditions

Companies can adopt worker voice mechanisms/tools/technologies to gather information and verify supply chain conditions from workers directly, and encourage company supply chains to adopt. Having an independent party, such as an NGO or worker rights group that workers trust, can help ensure that company mechanisms are well functioning and effective.

### Q What is worker voice and worker engagement?

**A** Worker voice and worker engagement are not the same thing. 'Worker voice' is a communication of the priorities, needs, and concerns of workers to their management, for the purpose of eliciting a response from management to the voiced needs. It is a term derived from the roots of the organized labor movement, and the classic example of worker voice are trade unions and collective bargaining agreements. 'Worker engagement' is a more general and 'unofficial' term referring to any range of approaches, programs, or technologies to connect with workers. It may or may not directly address workers' needs and priorities.

Sometimes it may be difficult to tell whether an initiative is worker voice or worker engagement. For example, management-worker dialogues or worker feedback/comment boxes may seem to be worker voice tools, but whether they are depends on whether or how management responds to workers' feedback and demands. Another example that is sometimes unclear are worker feedback technology tools.

[riseafood.org](https://riseafood.org)

## RISE Worker voice continuum

### Worker feedback

- Suggestion boxes
- Worker surveys
- Hotlines

#### Key Features

- One-way communication
- Management-focused
- Little or no feedback to workers

### Worker engagement

- Open talk sessions/focus groups
- Worker management meetings
- 360 performance reviews
- Effective grievance mechanisms

#### Key Features

- Management- or worker-initiated
- Two-way communication
- Management dialogues with workers regarding suggestions or concerns and communicates results

### Worker participation

- Safety committees
- Worker welfare committee

#### Key Features

- Participation appointed by management and workers
- Defined roles and responsibilities

### Worker representation

- Trade unions
- Collective bargaining agreements

#### Key Features

- Workers elect representatives
- Management honors results of election
- Management negotiates in good faith over terms of employment

Content originally presented to the Seafood Task Force by Doug Cahn/The Cahn Group, LLC: May 2018

## RISE Giving workers a voice in supply chains – Freedom of Association & Collective Bargaining

### MYTH 5

Workers' rights to form unions, self-organize, and bargain collectively is extraneous to company due diligence efforts

### TRUTH

Collective bargaining and freedom of association are critical tools for workers to prevent and address potential labor exploitation

### Q What is Freedom of Association and Collective Bargaining?

**A** Freedom of Association (ILO C87 Freedom of Association and Protection of the Right to Organize Convention): The right of workers to individually and collectively come together to organize without government interference.

This includes gatherings to:

- promote common interests,
- establish independent organizations,
- join trade unions, strikes,
- engage in free speech,
- form and participate in societies, clubs, and other groups.

**Collective Bargaining (ILO C98 Right to Organize and Collective Bargaining Convention):** A process for workers and employers to negotiate terms and reach agreement and conditions of work.

"The freedoms to associate and to bargain collectively are fundamental rights. They are rooted in the International Labour Organization Constitution and...their core value has been reaffirmed by the international community." - International Labor Organization Source

"Strong and independent workers' and employers' organizations, and the effective recognition of their right to engage in collective bargaining, are major tools for labor market governance. Collective bargaining is a way of attaining beneficial and productive solutions to potentially conflictual relations between workers and employers." - International Labor Organization Source

[riseafood.org](https://riseafood.org)



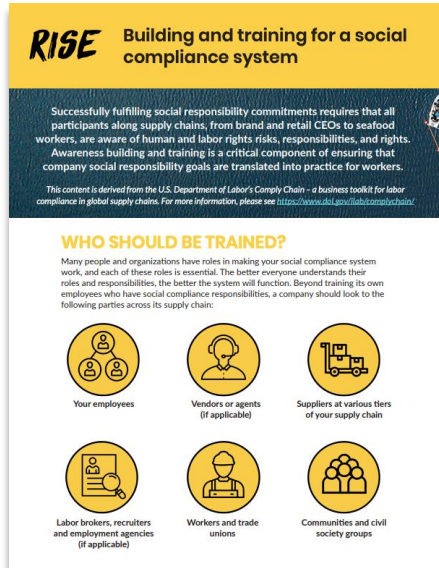
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# Strategy: Build Capacity

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# Guidance on Building Capacity

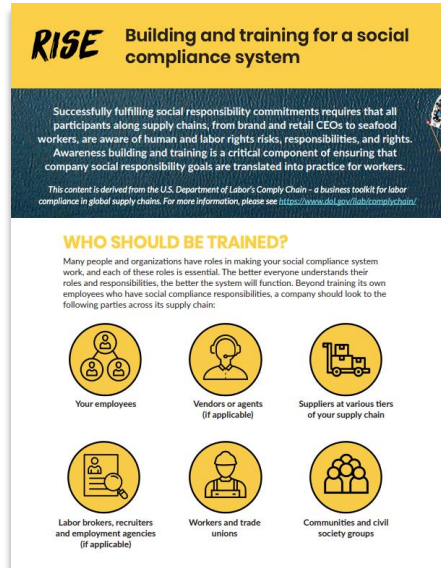


## Who should be trained:

- Company leadership and board
- Your employees
- Vendors or agents (if applicable)
- Suppliers at various tiers of your supply chain
- Labor brokers, recruiters and employment agencies (if applicable)
- Workers, worker representatives, and trade unions

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# Guidance on Building Capacity



## Minimum content covered:

- The standards included in your code of conduct
  - A comprehensive overview of your social compliance system, showing all of its components and how they fit together, to help everyone understand their part in the system;
  - Your expectations for each component of the system, who is responsible for which components and how you hold them accountable;
  - What to expect from an audit, and how audit data are independently verified;
  - The company's remediation policies and procedures;
  - Workplace values, including mutual respect and honesty;
  - The company's public reporting; and
  - Opportunities for input, including grievance mechanisms.
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Strategy: Use Root Cause  
Analysis

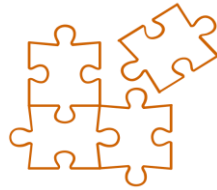
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# ROOT CAUSE ANALYSIS (RCA)



DEFINE THE  
PROBLEM



DETERMINE  
CAUSAL  
RELATIONSHIPS



IDENTIFY  
EFFECTIVE  
SOLUTION(S)



IMPLEMENT  
AND TRACK  
SOLUTIONS



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## We're working on RISE 2.0

- Tailored guidance for specific supply chain nodes
- More educational resources
- Simplified and streamlined content
- More case studies to learn from
- Additional organizations in the referral hub
- Improved website usability
- Potentially a self-assessment tool

**RISE**

Support us in supporting you by taking our [survey](#)

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**RISE**

# Visit [riseseafood.org](https://riseseafood.org)

- Learn more about potential social issues in your supply chain
- Find action steps to build responsible seafood supply chains
- Links to tools, templates, and resources to implement due diligence practices
- A worker-centered approach and perspective on key topics





**RISE**

# Questions?

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