

GLOBAL TUNA ALLIANCE



PREPARED BY THE GLOBAL TUNA
ALLIANCE TO SUPPORT TUNA
2020 TRACEABILITY DECLARATION
SIGNATORIES

Tuna 2020 Traceability Declaration Social Responsibility Toolkit

August 2020



About The Global Tuna Alliance

The Global Tuna Alliance is an independent group of retailers and tuna supply chain companies, who are committed to realising harvest strategies for tuna fisheries, avoidance of illegal, unreported and unregulated (IUU) products, improved traceability as well as environmental sustainability, and progressing work on human rights in tuna fisheries and to implementing the objectives laid out in **World Economic Forum's** Tuna 2020 Traceability Declaration as championed by **Friends of Ocean Action**.

They work collaboratively with member and non-member organizations to find industry-wide solutions to efficiently implement actions to address Alliance and Tuna 2020 Traceability Declaration commitments on:

- Tuna Traceability
- Socially Responsible Tuna Supply Chains
- Environmentally Responsible Tuna Sources
- Government Partnership

In the summer of 2019 Stichting **Global Tuna Alliance** was incorporated as a foundation under the laws of the Netherlands.

Author:

Dr Tom Pickerell

About The Roadmap for Improving Seafood Ethics

FishWise led the development of the Roadmap for Improving Seafood Ethics (RISE) in consultation with Verité and Issara Institute with the goal of making social responsibility easier for seafood companies.

Purpose of toolkit



The aim of these toolkits is to provide support to Tuna 2020 Traceability Declaration signatories in meeting their commitments.

Each toolkit explains what each commitment seeks, the purpose of the commitment and how progress in achieving the commitment can be demonstrated. Where available, examples from companies that have met the commitment are presented.

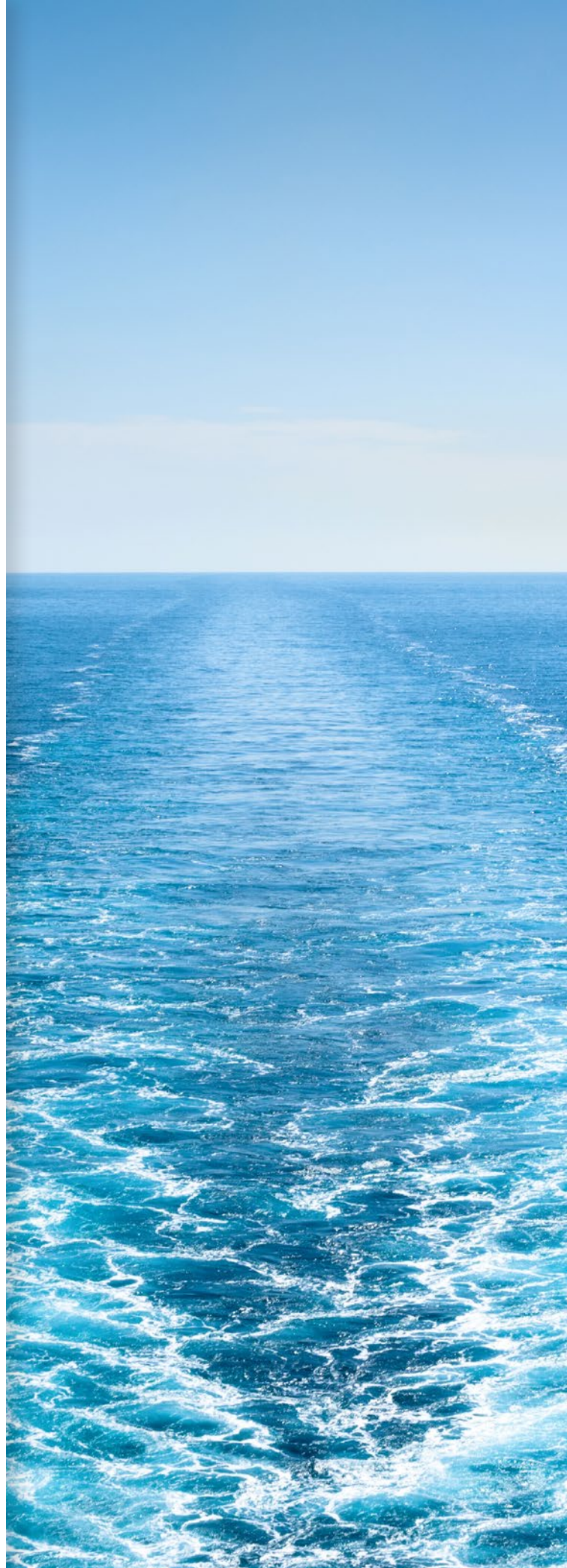
The Tuna 2020 Traceability Declaration

The Tuna 2020 Traceability Declaration is a non-legally binding declaration that grew out of a dialogue among governments, companies and civil society, spurred by The Ocean Conference in June 2017 at the United Nations Headquarters that will focus on implementation of [Sustainable Development Goal 14](#) (SDG 14).

Sixty-six companies, including retailers and other tuna supply chain businesses, signed the Declaration with the aim of stopping illegal tuna getting to market, and promoting improvements in the environmental sustainability and human rights in tuna fisheries. The declaration was supported by six national governments and 21 civil society organizations.

The Commitments of the Forum's Tuna 2020 Traceability Declaration are based on the following four pillars:

- Tuna Traceability Commitment
- Commitment to a Socially Responsible Tuna Supply Chain
- Commitment to Environmentally Responsible Tuna Sources
- Government Partnership





The social responsibility commitment

We pledge to eliminate any form of slavery and ensure suppliers at least meet minimum social standards in management practices as recommended in the Universal Declaration of Human Rights and the International Labour Organization's Conventions and Recommendations.

What is social commitment?

The Tuna 2020 Traceability Declaration social responsibility commitment refers to slavery and minimum social standards.

In the context of GTA's work, slavery is a general term often used when referring to holding a person in compelled service, including trafficking, forced labour, involuntary servitude, and bonded labour as well as recruiting, harbouring, transporting, providing or obtaining a person for this labour through force, fraud, or coercion. Anti-Slavery International has further [resources](#) on the term slavery.

Minimum social standards would ensure that basic human rights and dignity are respected, labour rights are protected and adequate living and working conditions provided. Furthermore, rights to resources, including tenure and access rights are secured.

In addition, there are increasing legal imperatives for organisations to identify and address labour abuses in their supply chains. New laws and regulations are emerging that are holding organisations to account for their role in modern slavery, both within their organisation and within their supply chain.



The Universal Declaration of Human Rights

The [Universal Declaration of Human Rights](#) (UDHR) was proclaimed by the United Nations General Assembly in Paris on 10 December 1948 (General Assembly resolution 217 A) as a common standard of achievements for all peoples and all nations. It sets out, for the first time, fundamental human rights to be universally protected and it has been translated into over 500 languages.

The UDHR serves as a foundational building block to help companies understand the international expectations and standards on these issues.

The International Labour Organisation's conventions and recommendations

Adopted in 1998, the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work commits Member States to respect and promote principles and rights in four categories (Figure 1), whether or not they have ratified the relevant Conventions. There are eight fundamental conventions that cover this Declaration. These conventions set minimum standards for which ratifying countries commit to incorporate into national law. Companies' should develop codes of conduct based on the provisions of these conventions.

The International Labour Organization's (ILO) [Work in Fishing Convention](#) (no. 188) came into force internationally on 16th November 2017.

ILO 188 entitles all fishers to written terms and conditions of employment (a fisherman's work agreement), decent accommodation and food, medical care, regulated working time, repatriation, social protection and health and safety on board. It also provides minimum standards relating to recruitment and placement and includes a mandatory requirement to have a certificate of medical fitness to work onboard a fishing vessel.

[The Government Partnership Toolkit](#) sets out how companies can support the ratification and implementation of ILO188.

Figure 1: The eight fundamental ILO Conventions

Freedom of Association & Collective Bargaining

1. Freedom of Association and Protection of the Right to Organise Convention, 1948
2. Right to Organise and Collective Bargaining Convention, 1949 (No. 98)

Elimination of Forced or Compulsory Labour

3. Forced Labour Convention, 1930 (No. 29)
4. Abolition of Forced Labour Convention, 1957 (No. 105)

Abolition of Child Labour

5. Minimum Age Convention, 1973 (No. 138)
6. Worst Forms of Child Labour Convention, 1999 (No. 182)

Elimination of Discrimination in Respect of Employment & Occupation

7. Equal Remuneration Convention, 1951 (No. 100)
8. Discrimination (Employment and Occupation) Convention, 1958 (No. 111)



Performance of Tuna 2020 Traceability Declaration signatories

In early 2020, Tuna 2020 Traceability Declaration signatories, were asked to complete an online survey to find out how they have been addressing the declaration's four commitments. Nearly two-thirds of companies believe their tuna supply chains are 'slave free', and nearly one in five stated they have third-party certifications to support this claim. However, it should be appreciated that currently there are no certifications that guarantee against slavery. The further from harvest the distribution of responses changes; there is a decrease in the number of responses reporting 'slave-free' tuna supply chains and increasing uncertainty. This pattern is also reflected in the proportion of suppliers of tuna products that at least meet minimum social standards which has a cascade effect up the supply chain.

Some respondents added further narrative that describes their activities and achievements in meeting the social responsibility commitment (example in leading practices highlights 1 & 2). Several companies noted they have systems in place for processing plants and other on-land activity but the gap in 'at-sea' verification was often cited. This aligns with the support identified by respondents – the need for a third-party auditable standard on vessels. However, while these can be a helpful tool, they should be viewed as but one tool for due diligence. **Companies need to adopt a multi-pronged approach to identifying supply chain conditions in order to best understand the labour rights issues workers may experience.**

¹As acknowledged in the previous section, social responsibility extends beyond 'slave free' – we are using the language in the original social responsibility commitment "We pledge to eliminate any form of slavery..."

Leading Practices Highlight

1. Bumble Bee Seafoods

Our land-based plants and suppliers are verified by third parties. We are actively working with suppliers and as part of the Seafood Task Force

to implement the vessel auditable standards and effective audit programme back to fishing vessels.

2. Lovering foods

Lovering Foods has rigorous procedures in place throughout its supply chain to mitigate against the risk of any form of slavery:

- All of our first-tier tuna suppliers are required to undergo at least an annual third-party social standards ethical audit. We accept ethical audits conducted under the following methodologies: SMETA, BSCI and SA8000.
- A key element of these internationally recognised standards is the prevention of forced labour and/or slavery, under which all tuna suppliers are assessed. Agency labour contracts, a key risk area, are also assessed within this process to ensure that contracted labour on-site is also compliant.
- Lovering Foods also has an internal 'Tuna Sourcing Policy', which all tuna suppliers are required to sign prior to the commencement of supply. This internal policy requires our tuna suppliers to increase transparency and traceability on the vessels they source from, including by checking working standards (specifically forced labour) on vessels at least annually. The Tuna Sourcing Policy states that all vessels should work toward meeting the ILO C188 Work in Fishing Convention.
- Our CSR staff have completed the following training conducted by Stronger
- Together: 'Tackling Modern Slavery in Global Supply Chains', and 'Modern Slavery in UK Businesses' to equip us with the best knowledge and understanding of modern slavery in our supply chains.
- In-house Modern Slavery Awareness Training is delivered to all head office staff on an annual basis, and in March 2019 it was delivered to our technical employees working at our shared distribution centre in Skelmersdale.
- We are committed to tackling the complex ethical issues surrounding seafood supply chains both within our own direct operations and in our broader supply chain by engaging in multi-stakeholder dialogue to drive widespread change.
- We have commenced work to explore how best we can manage mitigating the risk of any form of slavery on board vessels and this remains a priority for us going forward.
- A more comprehensive explanation of how Lovering Foods are specifically addressing slavery within its tuna supply chain can be found in our most recent [Modern Slavery Statement](#).

Leading Practices Highlight

3. Marks and Spencer

We are working on development of the Responsible Fishing Vessel Scheme

4. Bolton Food

Bolton Food considers the respect for human rights to be an essential element of all corporate activities and a fundamental pillar of any sustainability strategy. For this reason, the company guarantees the protection of the rights not only of its workers, direct and indirect, but also works actively in favour of the communities impacted by its business.

In particular, when it comes to its tuna business, as of October 2016, all of Bolton Food's suppliers are required to sign and be compliant with the Bolton Group's Code of Ethics and Human Rights Policy. To verify the respect of the Policy, in 2017 all the suppliers were requested to answer a self-assessment questionnaire. The Company is currently running a second assessment for the suppliers considered 'high risk' and will develop a specific strategy in 2020, accordingly to the results of the assessment.

From June 30, 2019, all of the Company's suppliers are required to respect the Vessel Code of Conduct for Tuna suppliers, that was drafted according to the principles of the ILO convention and of the Seafood Task Force. This is a policy covering the fundamental labour standards including voluntary labour, human trafficking, underage workers, health and safety standards and conditions, and it is subject to periodic audits, that will start in 2020. Taking care of working conditions and human rights is part of the commitments of the Bolton Food – WWF partnership signed in 2016. Bolton Food is working with Conservation International in a study of existing synergies between the Monterey Framework and Bolton

Food's social and labour policies implemented into FIPs, specifically regarding the Atún de Pesca Responsable fleet certification applied to its owned vessels in the Pacific Ocean, which guarantees the security and maritime control as well as the best labor standards under the ILO 188 Convention. The Company is also involved in a programme aiming at improving the working conditions and livelihoods of its employees and of the communities where its production plants are located. In 2020, Bolton Food will continue the roll out of ongoing projects for workers and communities in Ecuador and Morocco and will start a new project dedicated to the protection of human rights along the entire supply chain.

As an ISSF participating company, we share its strategic plan, that states: "Closely monitor credible, third-party efforts to develop and implement labor and social standards for tuna fishing activities on a global scale; once broadly accepted standards are defined, explore appropriate ways for ISSF and/or participating companies to support these standards." ISSF participates in the Seafood Task Force's Tuna Working Group that has developed a Vessel Auditable Standard for social and labor issues.

ISSF also regularly discusses this issue within Bolton Food's Environmental Stakeholder Group to both inform partner NGOs on the information ISSF has gathered regarding ISSF participating companies' social and labour policies and codes of conduct, as well as to discuss possible opportunities for future ISSF support of emerging standards.

The reliance on third-party standards is unsurprising as they often emerge as the first meaningful initiatives in areas where legislation is weak but action is demanded. The frequency of companies noting upcoming capacity-building activity with suppliers again highlights the importance respondents place on improving social responsibility and education. Several companies have developed or are developing in-house processes to audit suppliers. Finally, several companies are developing strategies for addressing social responsibility in 2020. This should not be taken to imply that all these companies have no processes in place already; in most cases companies are building on existing systems as they learn more and as tools such as third-party standards become available.

Complexity was the primary challenge respondents noted in meeting the social responsibility commitment. This complexity is likely to stem from the breadth of the issue which includes coercive treatment of both sea and land-based workers, abusive labour and recruitment practices variously referred to as slavery or slavery-like practices, forced and bonded labour, human trafficking, and serious forms of child labour. This issue affects many countries and a wide range of products. When the responses to this question are analysed by supply chain sector, we find that complexity was the only obstacle reported by all steps of the chain.

When asked what support is required to achieve the social responsibility commitment, responses again converged around a number of related themes including the need for a third-party auditable standard on vessels. The 'at-sea' portion of the supply chain has often been a risk area for human rights abuses with vessels operating away from enforcement activities and ports for several weeks at a time. The sometimes complex and opaque nature of tuna supply chains amplifies the challenge.

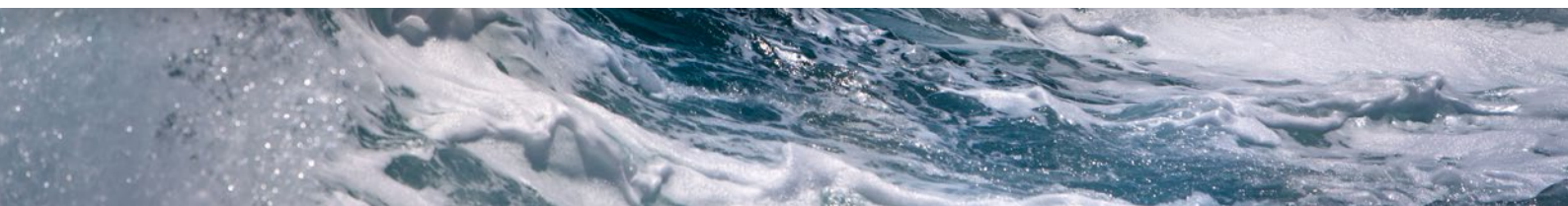
The requirement for third-party standards has led to the internationalisation of the [Responsible Fishing Vessel Scheme](#) and the development of the [Seafood Task Force tuna vessel standard](#). In addition, OPAGAC (an association of frozen tuna producers in Spain) has developed a [Tuna for Responsible Fisheries \(APR\)](#) standard with the Spanish certification organisation, AENOR.

However, sole reliance on third-party standards is not recommended, and companies need to adopt a multi-pronged approach to identifying supply chain conditions in order to best understand the labour rights issues workers may experience. Collaboration and capacity-building requests were also frequently raised by respondees and can be summarised as wanting a shared understanding of the required standards and potential solutions. Significant resources already exist to support companies in improving social responsibility, but access to these resources and/or understanding how they 'fit together' appears to be a limiting factor.

The survey responses suggest that significant progress can be made towards meeting the commitment if signatories actively use the many available resources.

The Food and Agriculture Organization (FAO) is currently working on guidance to facilitate compliance towards social responsibility in fisheries and aquaculture along supply chains. The FAO Draft Guidance on Social Responsibility in Fisheries and Aquaculture Value Chains is based on international human rights anchored on the International Bill of Human Rights of the Universal Declaration of Human Rights, and instruments and standards of the International Labour Organization (ILO). The guidance was meant to provide a human rights standard by articulating core principles related to the inherent dignity of all individuals, elimination of forced labour, fair treatment for all, gender equity, child labour, and rights of migrant workers. However, at the 2019 meeting of the FAO Committee on Fisheries (COFI) Sub-Committee on Fish Trade, the members requested further work to make explicit that these are voluntary guidelines. **It is recommended that supply chain members utilise the guidelines, when published, to simplify and consolidate international standards.**

The survey responses suggest that significant progress can be made towards meeting the commitment if signatories actively use the many available resources. The aim of this toolkit is to provide access to these resources and an understanding how they can be used synergistically.





What you can do to meet the social responsibility commitment

Through their [Roadmap for Improving Seafood Ethics \(RISE\)](#) initiative², FishWise have developed comprehensive guidance, specific recommendations and collections of resources to help companies improve business practices, implement worker-centred solutions and build responsible seafood supply chains. The guidance takes the form of a roadmap (Figure 3) with actionable recommendations and resources to make improvements in each category:

- Evaluating and monitoring supply chain risk
- Improving supply chain practices
- Communicating about policies, expectations, and progress

This information is not meant to be conducted in a linear manner and each company should assess their social responsibility program internally to identify which steps/actions need to be taken, and the sequencing of those activities. FishWise are available to support companies as required.

²FishWise is in the process of updating the RISE platform - This updated version of RISE will launch available in March 2021

Identify your specific role in the supply chain

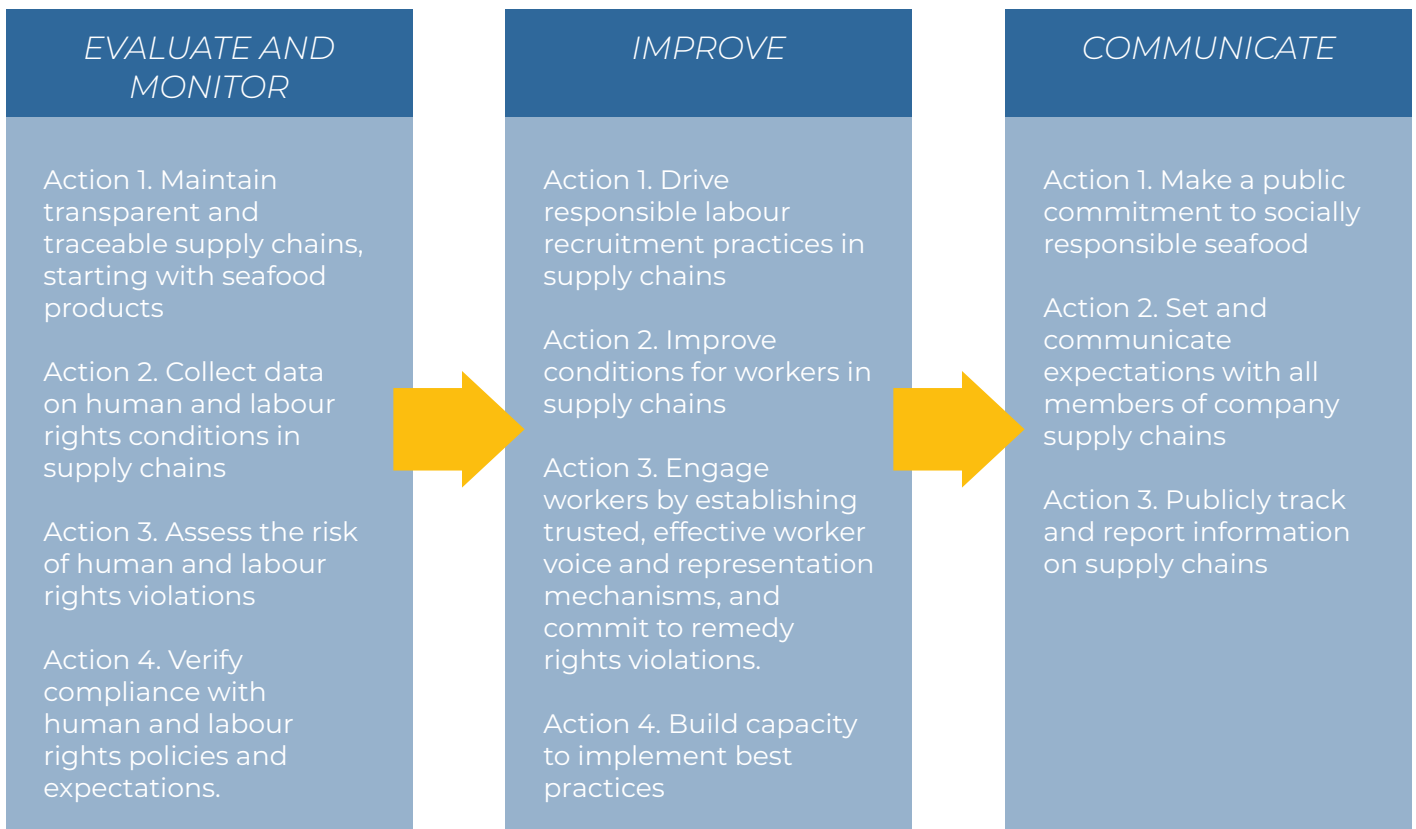
Throughout RISE, the terms buyer and employer are used to provide tailored and specific guidance to the various types of companies involved in seafood supply chains. Buyers typically operate downstream and need to consider risks and ensure compliance with upstream and downstream business operations, and buy from other operations that conform to your supply chain expectations. Employers operate more upstream and are directly responsible for the welfare of workers. Employers need to assess risk, ensure best practice in own business operations, and monitor working conditions in supply chains.

- The buyer category includes brands, retailers, restaurants, food service, distributors, vendors, and wholesale/fishmonger/auction markets.

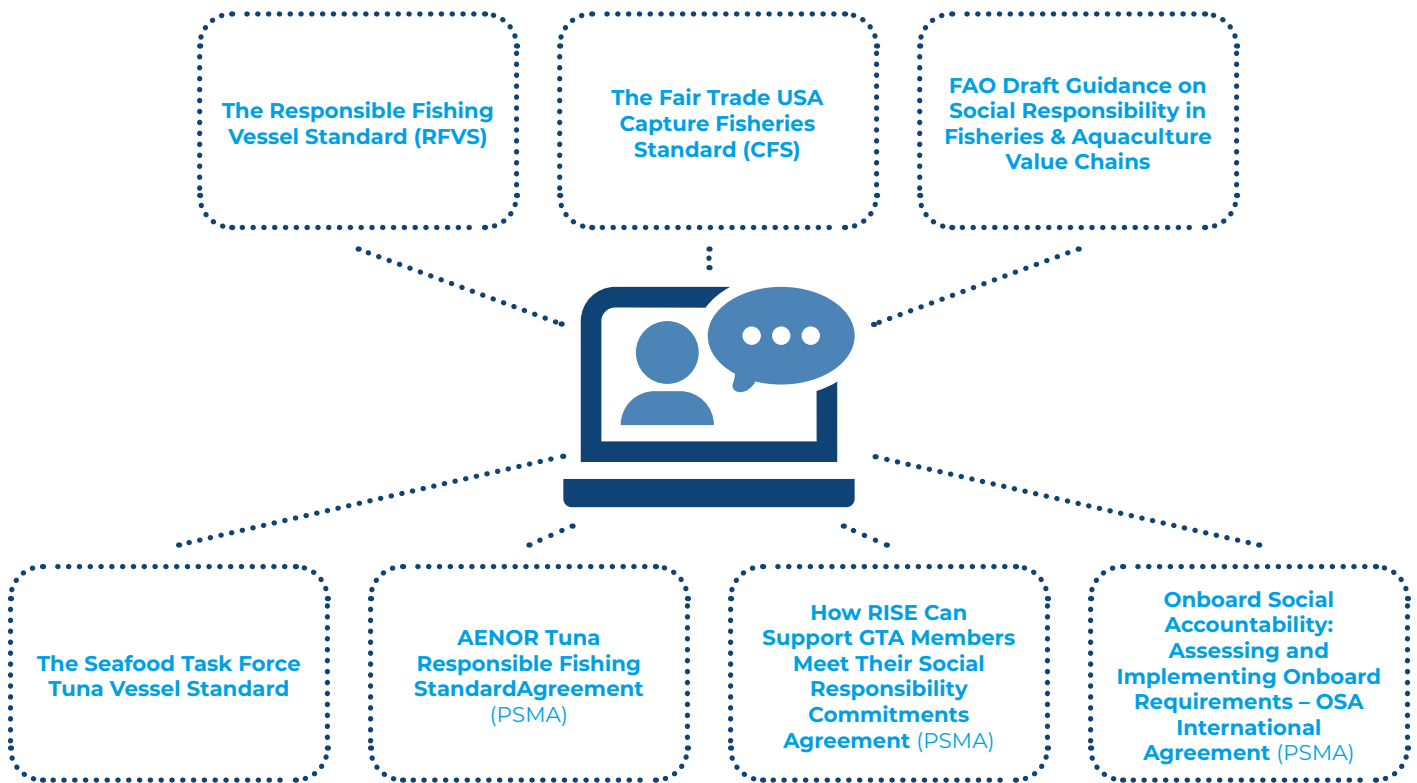
- The employer category includes: producers, primary processors, harvesters, vessel owners, farm owners, and breeder/hatcheries.
- Some companies operate as both a buyer and an employer. Companies that are considered both include secondary processors, suppliers, brokers, and fish meal plants.

Companies making requests of upstream suppliers should consider that suppliers may face a variety of constraints that impact their ability to fulfil expectations, and should pair support and capacity building when making requests of suppliers.

Figure 3: Roadmap for Improving Seafood Ethics



To further support companies, the GTA has organised a series of educational webinars on each commitment. For the social responsibility commitment, the following webinars have been hosted.



Evaluating and monitoring supply chain risk for human and labour rights abuses begins with maintaining transparent and traceable supply chains (Figure 4; Action 1 and Box 1).

Action 1. Maintain transparent and traceable supply chains, starting with seafood products	Action 2. Collect data on human and labour rights conditions in supply chains	Action 3. Assess the risk of human and labour rights violations	Action 4. Verify compliance with human and labour rights policies and expectations
Step 1: Map your supply chains	Step 1: Understand that collecting data on people differs from products	Step 1: Assess risk of forced labour and modern slavery in supply chains	Step 1: Monitor and verify compliance
Step 2: Determine what product data to collect from supply chains	Step 2: Determine what information to collect on human and labour rights conditions in supply chains		
Step 3: Incorporate traceability	Step 3: Collect information on working conditions	Step 2: Assess risk from recruitment	
Step 4: Join an industry initiative to drive traceability			

Figure 4: Evaluating and monitoring supply chain risk Actions

Box 1.

Action 1. Maintain transparent and traceable supply chains, starting with seafood products

Step 1: Map your supply chains

Buyer & Employer steps

- Require complete supply chain mapping from the vessel or feed level to the end buyer. Supply chain mapping begins with identifying the actors in company supply chains, requesting information on regions they source from, and information about suppliers in their upstream operations, including but not limited to:
 - names of upstream suppliers
 - address of suppliers' business headquarters
 - ownership of suppliers' business
 - presence of subcontracting.
- Full supply chain mapping includes assessing supply chain traceability or requesting key data from suppliers.

Resources:

Fishwise - *Simplified Diagram of Seafood Supply Chains*
Verité - *Responsible Sourcing Tool: Mapping the Seafood Supply Chain*
ComplyChain - *Supply Chain Mapping (see Step 2: Assess Risk)*

Step 2: Determine what product data to collect from supply chains

Buyer & Employer steps

- Identify what data to collect from supply chains, including which key data elements seafood companies, retailers, and foodservice companies need to implement in their traceability systems.

Resources:

Future of Fish - *Seafood Traceability & Key Data Elements: Summary of Recommendations for Moving Forward*
Future of Fish - *Recommendations for Addressing Seafood Traceability and Key Data Elements*

Step 3: Incorporate traceability

Buyer steps

- Update traceability systems and move towards traceability best practices.
- Participate in the refinement and implementation of industrywide interoperability best practices.

Employer steps

- Put systems in place to collect data and maintain clear and updated documentation of company supply chains.
- Maintain a reliable and effective database or system for tracking this information and updating it regularly.

Resources:

Future of Fish - *Taking the First Steps Towards Full-Chain Traceability: A Preliminary Guide for Industry*
Future of Fish - *Engaging Trading Partners for Full-Chain Traceability*
Future of Fish - *Assessing Internal Traceability Capacity Questionnaire*
Future of Fish - *Selecting Technology Vendors: Issuing RFPs*
TAST-T - *Trade Association for Seafood Traceability Technology*
FishWise - *Traceability next steps for businesses*
WWF - *Traceability principles for wild-caught fish products*

Step 4: Join an industry initiative to drive traceability

Buyer step

- Participate in traceability focused multi-stakeholder initiatives to provide knowledge, guidance, and collective actions.

Resources:

Other - *The Seafood Alliance for Legality and Traceability (SALT)*
Other - *The Global Dialogue on Seafood Traceability (GDST)*
Other - *The Seafood Task Force*

The first step in understanding human rights risks in a company's supply chains is to map your supply chains. This involves identifying each tier and the suppliers involved such as vessels, farms, processing facilities, and even inputs, like feed for aquaculture species, and subcontractors. Once you have mapped your supply chains, the next step in the process is to identify which key data elements (KDE) need to be collected and then incorporate those KDEs into the data collection process and traceability systems.

The second action (Figure 4; Action 2 and Box 2) is to collect data on human and labour rights conditions in supply chains. Companies need to collect information from supply chains on the following categories:

- Labour recruitment: terms, conditions, and contracts
- Document retention and freedom of movement
- Wages, working hours, and payment
- Benefits allowed by law
- Threats of violence and intimidation
- Abusive working conditions
- Safe, functioning, accessible grievance mechanisms for workers

When collecting data on working conditions, it is critical to seek the opinions and perspectives of workers themselves. Direct worker engagement, via independent, confidential third-party worker associations and organisations representing workers that speak the same language of the worker and have the trust of the worker, provides the most accurate information of conditions and worker experience.

If a company is in the early stages of the journey, without mechanisms or a commitment for driving remediation if exploitation is found in its supply chains, the company should be aware that collecting information directly from workers may actually place workers at further risk. Instead, focus on the comprehensiveness and quality of information collected through due diligence efforts to minimize the potential of collecting false positives or exposing workers to risks of reprisal. At the same time, work to establish mechanisms for safe, effective remediation so worker-focused supply chain management becomes possible. The Ethical Trade Institute (ETI) has a helpful [guide](#) for companies to establish and participate in effective remedy mechanisms for workers who may be adversely impacted by business operations, products, services or relationships in the entirety of their supply chains.



Box 2.

Action 2. Collect data on human and labour rights conditions in supply chains

Step 1: Understand that collecting data on people differs from products

Buyer & Employer steps

- Learn about the unique aspects of data collection on worker wellbeing in supply chains. This involves recognizing key distinctions between the collection processes for environmental sustainability data and social responsibility information.

Resources:

RISE - [Collecting data on people in seafood supply chains](#)

Step 2: Determine what information to collect on human and labour rights conditions in supply chains

Buyer & Employer steps

- Companies need to identify what data to collect within supply chains in order to assess working conditions.

Resources:

Verité - [Sample Seafood Supplier/Subcontractor Self-Assessment](#)

U.S. Customs and Border Protection - [Reasonable Care: An Informed Compliance Publication](#)

Verité - [Sources of Information to be Sought in the Verification Process](#)

FishWise- [Social Responsibility Information for Seafood Supply Chains: A Compilation of Resources](#)

Step 3: Collect information on working conditions

Buyer steps

- Request and collect information on human and labour rights conditions from all suppliers, and work to implement data collection processes that involve worker participation.

- Make sure suppliers are aware of information that will be requested. To do this, extend this requirement to all segments of supply chains, by including data collection requirements in supplier expectations letters and supplier codes of conduct.

Employer steps

- Collect information on working conditions within own operations, and work to implement data collection processes that involve worker participation.
- Use worker engagement mechanisms to regularly collect information about human and labour rights conditions directly from workers.
- Maintain updated documentation about working conditions and labour rights in supply chains. Employers should communicate with upstream business operations to determine what data/information needs to be provided.

Resources:

Verité - [Conducting Migrant Worker Interviews](#)

Issara Institute - [Transformative Technology for Migrant Workers](#)

Verité - [Integrating Social Data into Product and Vessel Traceability Systems](#)

FishWise - [Open Water: Guidance on Vessel Transparency for Seafood Companies](#)

Issara Institute - [Understand the ethical issues with data collection](#)



Assessing the risk of human and labour rights violations in supply chains (Figure 4; Action 3 and Box 3)) begins with understanding the **indicators of forced labour**, as defined by the International Labour Organization (ILO). Conducting a high-level risk assessment of human and labour rights conditions in supply chains involves gathering information from a variety of sources, including:

- Information on social responsibility practices directly from existing suppliers.
 - This can be done through vendor surveys with questions specifically targeted to identify what social responsibility practices suppliers have in place. Information received from surveys can be used to determine suppliers' risk for human rights abuses, identify gaps in social responsibility practices, and work with the supplier to create a plan of next steps.
 - Supplier self-assessment questionnaires are an additional tool for collecting information from suppliers.
- International and national government-produced reports which focus on risk at a country, region, or commodity level.
- Public tools and risk assessment guides.
- Third-party consultancies.

There are a number of steps necessary in order to conduct a rigorous risk assessment:

- Companies should start by assessing risk at the highest level first - beginning at the country level (country risks for child and forced labour for fishing can be determined through free-to-use risk assessment platforms listed in Box 3) - and then assessing down through suppliers and labour providers.

- Publicly available information may not be available for individual suppliers; however, it often provides data on countries of production, countries of labour supply, and particular types of supply chains or fisheries within a country of production. When information is not publicly available, companies can gather it directly from suppliers via self-assessments or questionnaires, or through working with consultancies who can specialize in this field. Though there are limitations with self-assessments, they can be a good starting place.
- Based on the results of a risk assessment, companies can prioritize which products require further investigation based on severity and scale of risk.
- Companies can then conduct a detailed risk assessment on high-risk products to understand supplier social responsibility practices, identify what the exact issues are and what improvements are needed.
- An assessment of social risks can be conducted simultaneously with an assessment of products at risk of being illegally harvested or mislabeled.

In addition, in order to understand the risk for labour and human rights abuses, a company must determine whether it has practices in place to:

- Assess risks that may be present due to its sourcing regions and specificities (e.g. distant water fishing, subcontracted facilities, etc.).
- Mitigate and address those risks through company practices intended to unearth and respond to issues that arise.

The importance of ethical recruitment

Recruitment practices can also put companies and workers at risk. The risks to workers from unethical recruitment practices include debt bondage, contract substitution and undisclosed fees and social isolation and absence of remedy.

When workers must pay exorbitant fees as a condition of obtaining employment, they can be subject to **debt bondage**, also known as bonded labour. This is the pledge of a person's services as security for the repayment of the fees or other obligation, where the terms of the repayment are not clearly or reasonably stated, and the person who is holding the debt and thus has some control over the labourer.

When a recruitment system lacks clear standards for transparency and accountability, risks to workers can arise from differences between the terms of work represented at the point of recruitment and those imposed at the workplace **Workers may find themselves subject to contract substitution and undisclosed fees** including punitive contract penalty terms not disclosed at the time of recruitment and non-disclosed charges for recruitment, documentation, transportation, and host-country housing and maintenance.

International, and internal, migrants may be isolated not only physically but by language and culture. Social isolation and an absence of remedy can leave workers exposed to abuse. **Confiscation of personal documents such**

as passports and visas results in increased vulnerability to unilateral employer demands, since workers otherwise inclined to walk away from abusive conditions might fear ending up in an undocumented status.

Companies employing workers, particularly migrant workers, should maintain documentation demonstrating:

- The policies and procedures followed to obtain workers.
- The recruitment policies and practices from each supplier.
- Free-of-charge services provided to jobseekers and workers.
- Transparent, ethical terms of engagement.
- Provision of written contracts to workers, including a copy of the contract provided to worker, with all terms explained in language a worker is fluent in.

In addition to documentation, having an independent third-party organisation, such as [IRIS](#) or the [Interfaith Center on Corporate Responsibility \(ICCR\)](#), that has trust with workers verify their recruitment conditions is one way to really know what's happening.



Box 3.

Action 3. Assess the risk of human and labour rights violations

Step 1: Assess risk of forced labour and modern slavery in supply chains

Buyer steps

- 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.
 - When possible, conduct an onsite visit.

Employer steps

- Conduct an internal assessment of own company operations to identify potential human and labour rights risks.
- Maintain updated documentation about working conditions and labour rights in supply chains to provide to upstream/downstream operations upon request.

Resources:

- ILO - *Indicators of Forced Labor*
- Sedex - *Guidance on Operational Practice & Indicators of Forced Labour*
- Verité - *Information Gathering and Risk Assessment in Seafood Supply Chains*
- RISE - *Conduct a high-level risk assessment*

Risk Assessment Platforms:

- *Responsible Sourcing Tool*
- *Global Slavery Index*
- *Seafood Slavery Risk Tool*

Step 2: Assess risk from recruitment

Buyer steps

- Assess risk from recruitment at each tier of supply chains through the following:
 - Require complete disclosure of labour recruiters used, and the recruitment policies and practices of each supplier, including: name of recruiter, address, license number, and license date of expiration.
- Collect data to assess whether suppliers are complying with company recruitment policies, and assess risk arising from responsible recruitment processes of own company and suppliers.

Employer steps

- Assess risk arising from responsible recruitment processes of own company and suppliers.
- Maintain documentation demonstrating that workers are recruited ethically, without having paid illegal or unauthorized fees in order to attain employment.

Resources:

- Verité - *An Ethical Framework for Cross-Border Recruitment*

Verifying compliance with human and labour rights policies and expectations is the final action in evaluating and monitoring supply chain risk (Figure 4; Action 4 and Box 4). Verification processes are a critical tool for evaluating whether suppliers and labour providers comply with company policies, codes of conduct, and expectations, to identify instances of non-compliance, and to determine where improvements are needed.

There are a variety of methods companies can use to gather and verify human rights and labour conditions within supply chains. These include social audits, social certifications and worker voice.

Social 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 review, and provide a snapshot in time of what is happening.** These are typically areas of assessment where workers receive little training and are sometimes unaware of their rights or legal requirements for workplaces.

However, **while audits can be a helpful tool to understand issues in supply chains, they should be viewed as one tool for due diligence.** The results of a social audits should be seen as a snapshot in time and can be difficult to scale in order to meet supply chain demands. Companies need to adopt a multi-pronged approach to identifying supply chain conditions in order to best understand the labour rights issues workers may experience.

Companies can consider utilizing **social certifications**, and seafood environmental certifications that include social components, as a tool to improve the social responsibility of seafood products. Robust certification programs with social components incorporate a variety of due diligence mechanisms into their methodology and processes. This includes comprehensive standards, highly trained auditors, the incorporation of worker voice principles into audits, and processes for making

improvements if needed. However, it is widely agreed amongst the NGO community and others engaged with businesses that have experience with vulnerable workers and monitoring processes that is not, at this point, possible to guarantee social standards on vessels isolated out at sea with vulnerable workers.

It is important for businesses to understand the components of a social certification when choosing which program to adopt. For the most part, certification standards in the seafood industry have been focused on improving ecological sustainability and traceability. However, some certification programs include social standards or are actively involved in developing them for the seafood industry. As a best practice, **companies should take time to understand the components addressed by a certification's standard, the parts of the supply chain that they cover, and mechanisms for verification and enforcement.**

Companies should ensure that verification processes include hearing directly from workers (in a manner that fosters trust and protects workers from potential retaliation), in order to obtain an accurate representation of supply chain working conditions. Worker voice can be a powerful and effective means to support workers and businesses and should directly influence remediation measures.

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. Worker voice mechanisms are needed because workers should always have a way to be heard by their employers - and employers should value being able to get honest feedback from their employees about how the business could improve.

It should be noted that 'worker voice' is a continuum with the Independent worker representation through trade unions and collective bargaining agreements the most effective means for workers to raise issues.



Box 4.

Action 4. Verify compliance with human and labour rights policies and expectations

Step 1: Monitor and verify compliance

Buyer steps

- Determine compliance of suppliers to expectations established through company policies, codes of conduct and supplier expectations.
- Engage in the following on a regular basis:
 - o Assess if suppliers have a code of conduct and review to ensure both supplier and company's own internal code of conduct are aligned with best practices.
 - o Collect results of verification activities conducted by suppliers.

Employer steps

- Demonstrate compliance through a combination of worker engagement mechanisms, social audits, and seafood social certifications, and a combination of other tools.
- Provide downstream buyers with information that demonstrates compliance with policies, codes of conduct and supplier expectations.

Resources:

ILO - *Handbook on "Checklist & Guidance for Assessing Compliance" Forced Labor: Book 4, pgs 3-17*

ILO - *Benchmarks of Good Practice in Recruitment and Employment in Seafood Supply Chains*

Issara Institute - *What is Worker Voice in the Context of Global Supply Chains?*

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

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

Verité - *Fair Hiring Toolkit*

Walk Free Foundation - *Questions to Ask During an Audit to Identify Labor Violations*

Walk Free Foundation - *Example Questions to Ask Employees During a Social Audit*

Certifications:

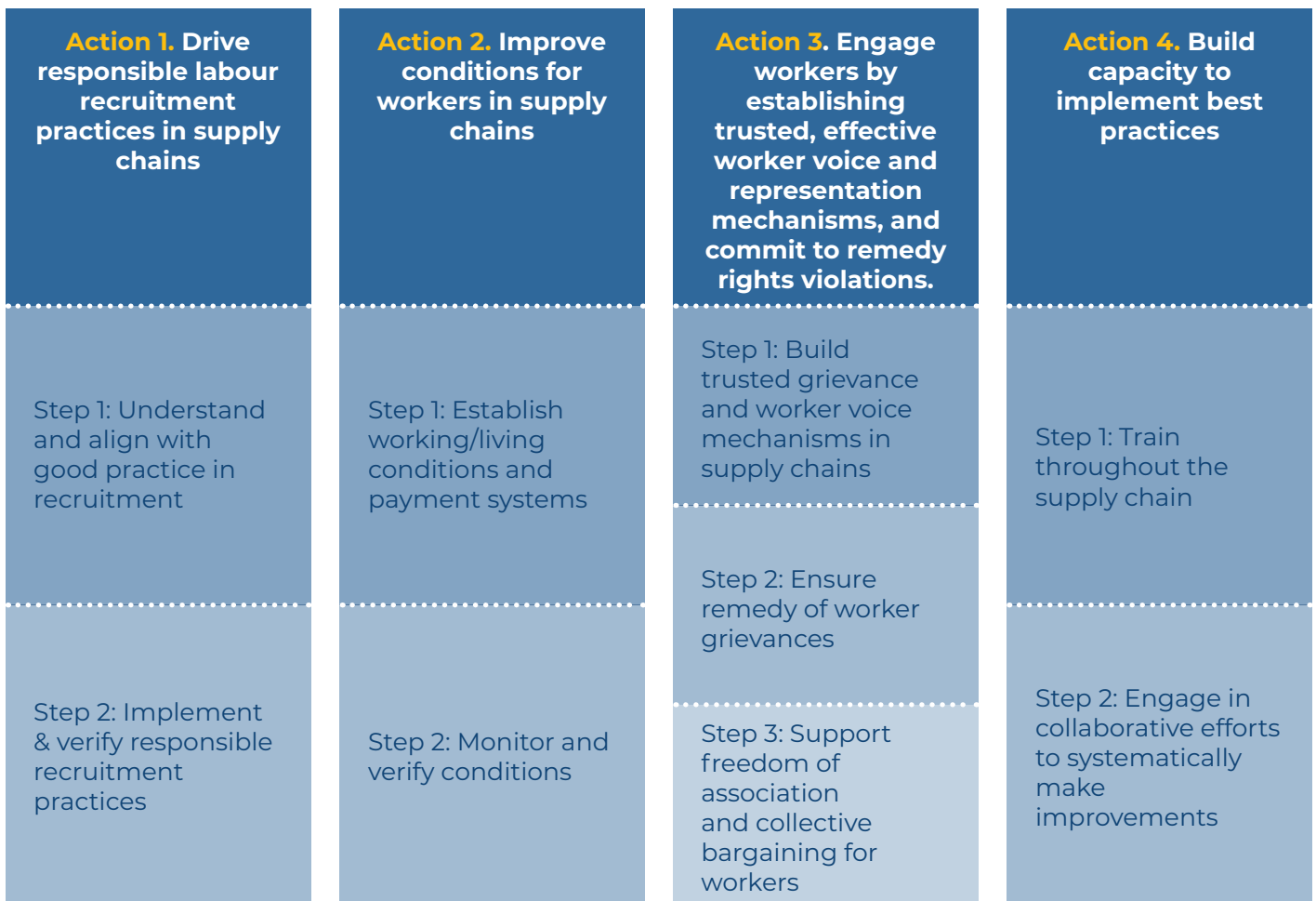
RISE - *Seafood Certifications with Social Elements and Certification Initiatives*

Other - *Responsible Fishing Vessel Scheme*

Other - *Seafood Task Force Tuna Vessel Standard*

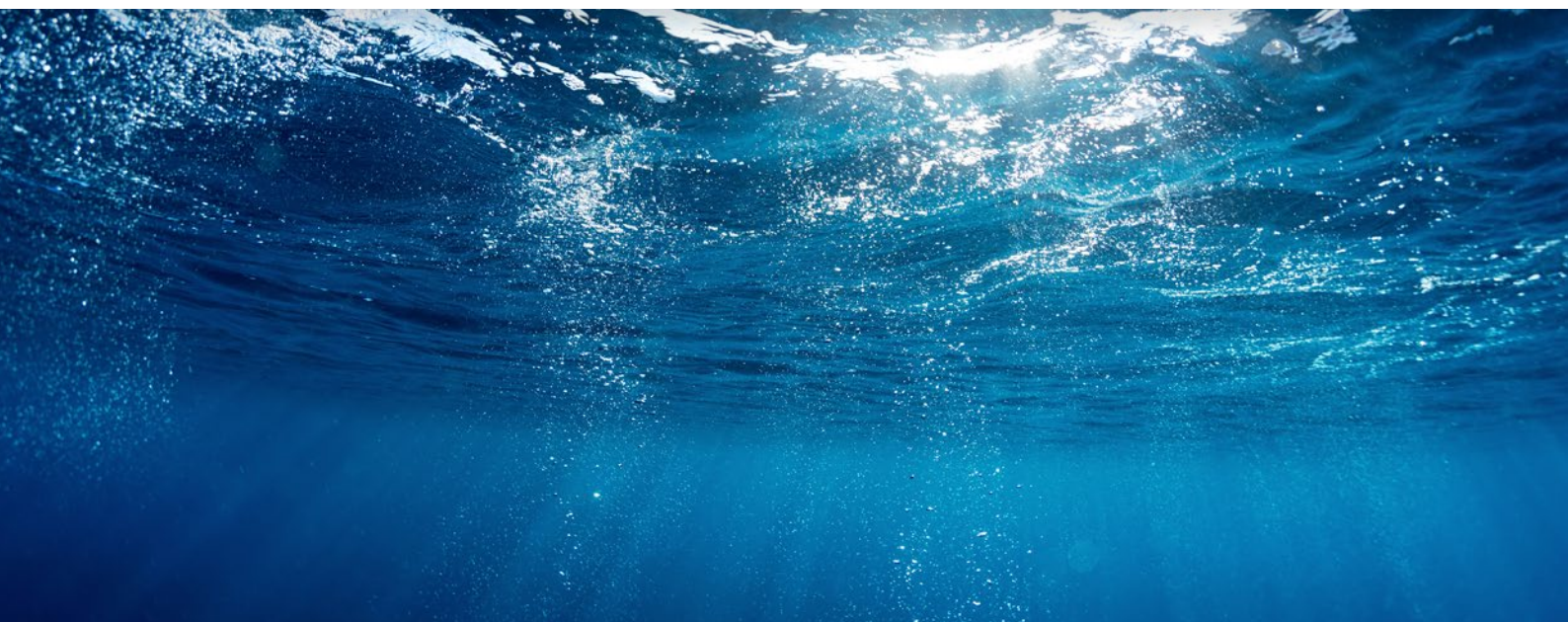
Other - *OPAGAC Atún de Pesca Responsable (APR) (Responsibly Fished Tuna)*

Figure 5: Improving Supply Chain Practices Actions



Improving supply chain practices begins with **driving responsible labour recruitment practices in supply chains** (Figure 5; Action 1 and Box 5). Ethical recruitment refers to the idea that no worker should pay exploitative fees to secure a job, and that companies should ensure that workers are recruited into their supply

chains through legal and ethical processes, with worker safe-guards and transparency built into the hiring process. There are many resources available to companies with information about and guidance for improving recruitment practices in supply chains (Box 5).



Box 5.

Action 1. Drive responsible labour recruitment practices in supply chains

Step 1: Understand and align with good practice in recruitment

Buyer steps

- Align with best practices for recruitment and recruitment fees as defined by labour experts, governmental agencies, and industry collaborations.
- Require suppliers to meet ethical recruitment standards - including to source workers from legal and ethical recruitment providers - and include this requirement in supplier expectations letters and supplier codes of conduct.
- In order to cascade expectations through supply chain, require existing and new suppliers to sign a declaration stating compliance with the company recruitment policies and legal requirements relating to recruitment.

Employer step

- Align with best practices for recruitment and recruitment fees as defined by labour experts, governmental agencies, and industry collaborations.

Resources:

RISE - [Getting recruitment right](#)

Issara Institute - [Slavery Free Recruitment Systems](#)

Issara Institute - [Worker Voice-Driven Ethical Recruitment: Streamlining and professionalizing employer-pays recruitment](#)

Issara Institute - [Developing a Financially Viable Ethical Recruitment Model: Prospects for the Myanmar-Thailand Recruitment Channel](#)

Issara Institute - [Driving behaviour change of recruiters, suppliers, and job seekers toward ethical recruitment: critical roles of global buyers & grassroots actors](#)

Step 2: Implement & verify responsible recruitment practices

Buyer step

- Verify recruitment practices of suppliers.

Employer steps

- Implement (and require subcontractors to implement) ethical recruitment policies that observe legal compliance and respect all relevant laws and ensure:
 - o No fees services to jobseekers and workers;
 - o Provision of written contracts to workers, including a copy of the contract provided to worker, with all terms explained in language worker is fluent in; and
 - o Provision to prevent the retention of worker documents, including identity, immigration documents, work permits or travel documentation.
- Verify recruitment practices in any downstream operations.

Resources:

RRT- [Responsible Recruitment Toolkit: Step by step guidance on how to eliminate recruitment employment fees in supply chains](#)

RRT - [Eliminating Recruitment and Employment Fees - Guide for retailers, brands, employers, labor providers](#)

Association of Labour Providers - [Template - Labour Providers Responsible Recruitment Code of Practice](#)

Verité - [Sample Benchmarks of Good Practice in Recruitment and Employment for Seafood Supply Chains](#)

Verité - [Monitoring the Performance of Labor Recruiters and Employers in the Seafood Supply Chain](#)

RISE - [Responsible Recruitment: additional resources](#)

The second action in improving supply chain practices is improving conditions for workers in supply chains (Figure 5; Action 2 and Box 6). Improving working conditions can be a long-term or iterative process. Depending on the country and context where the labour risks are occurring, workers may be treated in a way that violates international expectations or corporate codes of conduct, yet may be the norm or not uncommon in the local context. Some labour practices may persist although they are technically in violation of national laws. Therefore, it can be helpful to triage labour issues and abuses into two categories:

1. Risks and abuses that are violations of national laws: These are generally easier to motivate suppliers to quickly rectify.
2. Risks and abuses that are not against national law, but are violations of buyer expectations for suppliers or codes of conduct: These may take more time and effort to rectify, depending on how clearly and consistently buyers hold suppliers to their codes of conduct.

Addressing violations of national laws requires a clear understanding of these laws, which can change frequently and may only be released in the native language.

Therefore, it is often necessary to work in partnership with local experts proficient in local laws as well as international labour standards in order to provide practical and legally accurate technical assistance to suppliers aiming to improve labour conditions. It is recommended that you work with on-the-ground providers to ensure that members of supply chains are upholding your expectations.



Box 6.

Action 2. Improve conditions for workers in supply chains

Step 1: Establish working/living conditions and payment systems

Buyer steps

- Require suppliers to:
 - Comply with relevant laws and uphold worker contracts with employers and recruitment agencies regarding working and living conditions and payment systems;
 - Demonstrate that working conditions, living conditions, and payment systems for workers that meet buyer expectations.
- Look for evidence that the two standards above are in place, and that policies and practices are communicated to workers in their own language. All relevant contracts should be compliant with national laws and the regional policies governing international labor recruitment; and all relevant buyer expectations are referenced for compliance purposes in supplier corporate policies, contracts, and employee orientation manuals/policy manuals. Buyer expectations may also be required to be posted in worksites. These should cover:
 - Recruitment fees (adherence to both source and destination country laws regarding recruitment if there are foreign migrant workers; transparency regarding fees for all parties including workers; service contracts between the employer and recruitment agency are in place);
 - Worker access to contracts (employer provides copies of contracts to all workers in their native language);
 - Worker access to personal identification, passports, visas to allow freedom of movement;
 - Working hours and hours of rest (employer provides clear information to workers regarding working hours and rest as per workers' contract and national labor laws);

- Worker benefits and leave (employer provides clear information to workers regarding benefits and leave as per worker contracts and national labor laws);
- Living conditions (employer provides clear information to workers regarding living conditions such as housing options, rental costs, utility fees, housing policies to workers in advance, as part of the recruitment process. Basic human rights and rights to privacy are upheld); and
- Payment systems (employer has clear communications to workers regarding working hours, overtime, bonus system and target setting. Workers receive payslips in their native language, clearly itemizing all payments and deductions).

Employer steps

- Ensure safe and legal working conditions, living conditions, and payment systems in own supply chains, and comply with relevant laws, codes of conduct, and worker contracts.
- Ensure the following practices are in place and are being enacted uniformly and clearly. These should cover:
 - Recruitment fees (adherence to both source and destination country laws regarding recruitment if there are foreign migrant workers, transparency regarding fees for all parties including workers, and service contracts between the employer and recruitment agency are in place);
 - Worker access to documentation (provide copies of contracts to all workers in their native language);
 - Working hours and hours of rest (provide clear information to workers regarding working hours and rest as per workers' contract and national labor laws);
 - Worker benefits and leave (provide clear information to workers regarding benefits and leave as per worker contracts and national labor laws);

Box 6. *cont'd*

- o Living conditions (provide clear information to workers regarding living conditions such as housing options, rental costs, utility fees, housing policies to workers in advance, as part of the recruitment process. Basic human rights and rights to privacy are upheld); and
- o Payment systems (clearly communicate to workers regarding working hours, overtime, bonus system and target setting. Ensure that workers receive payslips in their native language, clearly itemizing all payments and deductions).
- Ensure there are clear communications channels and processes if workers have questions or concerns.

Resources:

ILO - *Handbook for improving living conditions on board fishing vessel*

FAO - *Best practices to improve safety at sea in the fisheries sector*

Sea Fisheries Project - *National Policy and Regulations*

Verité - *Sample Code of Conduct Provisions for Seafood Supply Chains*

Seafood Task Force - *Code of Conduct*

Verité - *International Labor and Human Rights Standards for Fishing*

Step 2: Monitor and verify conditions

Buyer & Employer step

- Verify that suppliers comply with relevant laws and codes of conduct for working and living conditions, and ethical payment systems.

Employer step

- Provide documentation of compliance with relevant laws and codes of conduct for working and living conditions, and ethical payment systems.



The third action in improving supply chain practices is engaging workers by establishing trusted, effective worker voice and representation mechanisms, and **commit to remedy rights violations** (Figure 5; Action 3 and Box 7). The United Nations Guiding Principles on Business and Human Rights state that companies have the responsibility to establish grievance mechanisms for workers who may be negatively impacted by business activities, in order to remediate harm to workers.

Grievance mechanisms

Grievance mechanisms, often set up as suggestion boxes, open door policies, or a free hotline, are formal, legal or non-legal, complaint processes that can be used by workers who are negatively impacted by business operations.

When functioning properly, these systems operate as an internal emergency service, alerting management to potentially serious labour or human rights claims within the company. Complaints delivered through mechanisms create a record of reported issues and can help establish a formal process of claims remediation.

Well-functioning grievance mechanisms:

- Gather workers' views through participatory monitoring tools.
- Establish safeguards to protect worker confidentially and prevent recrimination or dismissal.
- Provide accessibility to all workers by providing access to workers in their own language, and provide appropriate language assistance as needed to workers who may not read or write.
- Provide regular communication with complainants to inform them of the status of their grievance.
- Ensure clear lines for corporate responsibility and follow up, and include public reporting on how grievances were received and resolved.
- Help companies identify and correct systemic issues.

While grievance mechanisms are set up to address issues once they are formally filed, worker feedback mechanisms are intended to solicit feedback from workers in consistent and systematic ways, even when a grievance has not been reported. Collecting near real-time

data directly from workers through surveys, interviews, or suggestion boards creates opportunities for workers to influence company strategy and workplace improvement initiatives. Company-led worker voice is particularly powerful in supply chains where workers have little or no access to protections or systems of justice in the country of employment.

While companies can benefit from a more satisfied and engaged workforce, by investing in worker voice systems, seafood companies can benefit in the following four areas: worker retention, risk management, public relations and reputation, and [traceability and IUU fishing prevention](#).

'Worker-driven social responsibility' (WSR)

[WSR models](#) are an effective tool for ensuring decent work in supply chains. It is similar to collective bargaining in that it involves a group of workers jointly negotiating their rights, with the difference that it targets companies at the top of supply chains instead of direct employers.

Commit to remedy

When supplier infringements are discovered in company supply chains, **it is imperative that companies initiate and complete full remedy to stop current harm, prevent future recurrence, and provide appropriate assistance to the victim** (Step 2).

Companies should attempt to engage in improvements if the supplier is willing, as this creates the opportunity for real and lasting improvement in supply chains. Switching suppliers immediately may further perpetuate the infringements, allowing issues to go unaddressed by a new buyer, and allowing worker violations to be transferred elsewhere. However, after appropriate time and communication, if a supplier is non-responsive and improvements are not made, no longer doing business with a supplier can become an action for consideration.

If human rights or labour violations are identified in a company's supply chains, companies should pursue the following actions:

- Identify the instance(s) of non-compliance and take immediate action to improve victim situations. This includes specifying and tracking company responses to the violation.
- Work collaboratively with suppliers to develop a Corrective Action Plan to address immediate concerns and root causes of the problem, and agree upon a timeline for improvements.
- Ensure resources are available for suppliers to implement required improvements.
- Establish a follow-up plan to ensure that needed corrections have been made.
- Connect the correction to a larger management systems improvement plan.

and abuse due to the combination of limited oversight, discriminatory laws, lax enforcement, and unequal treatment by governments and employers.

Programs that attempt to ensure just working conditions must include workers and their representative organizations at every step of the process – from design through implementation and enforcement – to ensure the measures put in place actually address the needs of the workers the program purports to benefit. **When sourcing from countries where collective bargaining and worker organizing is legally prohibited companies should develop specific policies and practices for worker voice, remediation, and join initiatives to advocate for regulatory reform.**

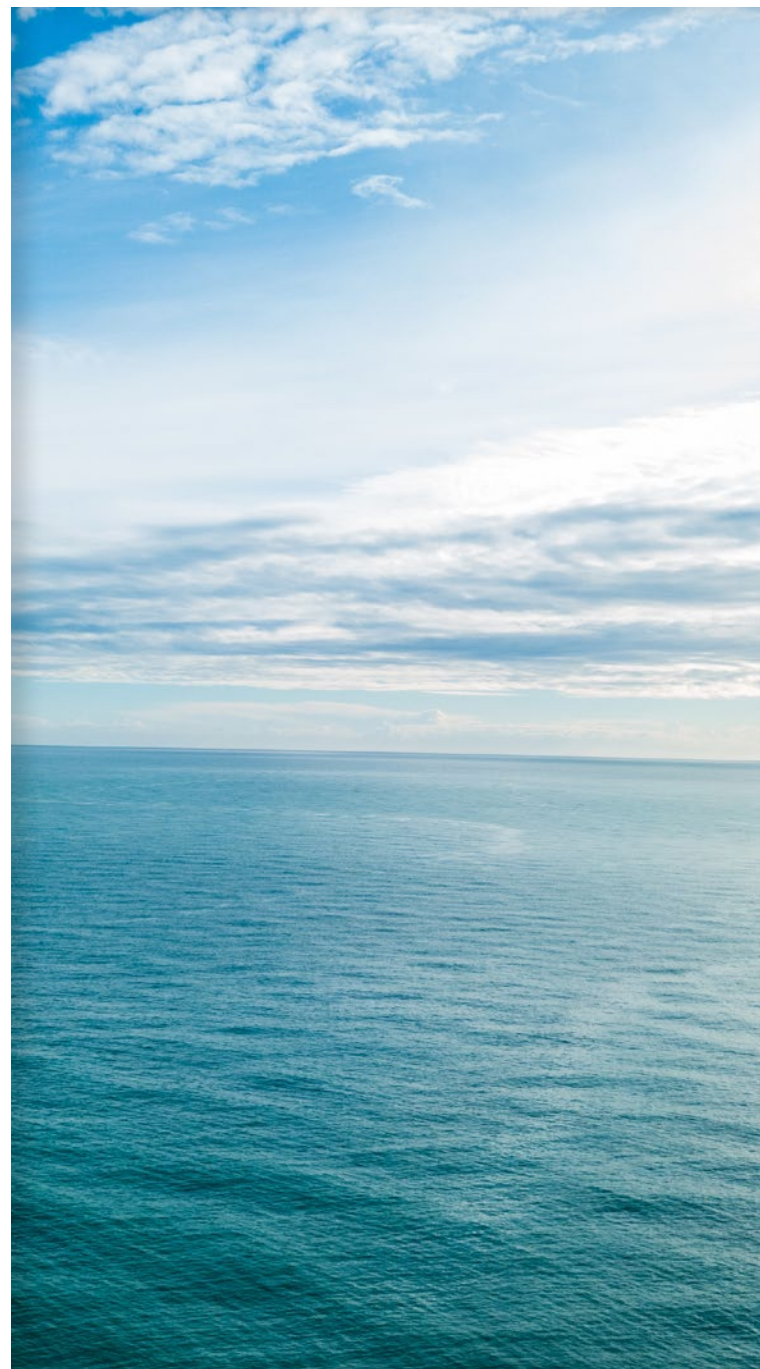
The third action in improving supply chain practices is engaging workers by establishing trusted, effective worker voice and representation mechanisms, and commit to remedy rights violations (Figure 5; Action 3 and Box 7). The United Nations Guiding Principles on Business and Human Rights state that companies have the responsibility to establish grievance mechanisms for workers who may be negatively impacted by business activities, in order to remediate harm to workers.

Collective Bargaining and Freedom of Association

Step 3 of this action is for companies to support freedom of association and collective bargaining for workers. Freedom of association and workers' right to collective bargaining is established in international standards by the International Labour Organization. In addition, many international established conventions and recommendations include provisions that require consultation with workers' organizations and representative employers.

The rights to freedom of association and collective bargaining are fundamental worker rights that enable the protection of other core labour rights.

They give workers a collective voice and a means to redress the power imbalance between workers and employers, thereby helping workers improve conditions and correct practices that contribute to forced labour and other unacceptable forms of work. These rights are particularly important for migrant workers on commercial fishing vessels, a group that is especially vulnerable to exploitation



Box 7.

Action 3. Engage workers by establishing trusted, effective worker voice and representation mechanisms, and commit to remedy rights violations.

Step 1: Build trusted grievance and worker voice mechanisms in supply chains

Buyer step

- Require that workers are able to safely access trusted grievance and worker voice mechanisms.
- Employer step
- Establish grievance mechanisms for workers to capture grievances (e.g. restricted freedom of movement/retention of documents, physical or verbal abuse, non-payment of wages) and implement practices to facilitate worker engagement in order to capture the feedback, experiences, and needs of workers.

Resources:

Ethical Trading Initiative - [Access to Remedy: Operational Grievance Mechanisms](#)
Verité - [What makes a grievance mechanism effective?](#)
Verité - [How to evaluate the effectiveness of grievance mechanisms](#)
RISE - [Understanding and verifying supply chain conditions through worker voice](#)
Oxfam - [Strengthening the voices of workers: The benefits for business](#)

Step 2: Ensure remedy of worker grievances

Buyer step

- Require that companies promptly and satisfactorily respond to human and labour rights grievances (e.g. restricted freedom of movement/retention of documents, physical or verbal abuse, non-payment of wages) raised by workers, and provide evidence of remediation.

Employer step

- Establish and implement processes for the remediation of worker grievances and track outcomes and settlements of worker grievances.

Resources:

IHRB - [Remediation and operational level grievance mechanisms](#)
ETI - [Access to remedy: Practical guidance for companies](#)
Verité - [Fair Hiring Toolkit](#)
Walk Free Foundation - [Corrective Action Plan Template](#)
Walk Free Foundation - [Making a Plan for Remediation](#)

Step 3: Support freedom of association and collective bargaining for workers

Buyer step

- Require supply chain actors to uphold workers' rights to freedom of association and collective bargaining, and leverage market power, including participation in multi-stakeholder initiatives to
- Advocate for policies that support freedom of association and collective bargaining for workers.

Employer step

- Establish the right of workers in supply chains to freely associate and promote workers' access to collective bargaining through unions and other collective negotiation instruments.

Resources:

RISE - [Giving workers a voice in supply chains - Freedom of Association & Collective Bargaining](#)
ILO - [Q&As on Business and Freedom of Association](#)
ETI - [Freedom of association & collective bargaining implementation roadmap](#)
ILRF - [Taking Stock: Labor Exploitation, Illegal Fishing and Brand Responsibility in the Seafood Industry](#)



The final action in improving supply chain practices is building capacity to implement best practices (Figure 5; Action 4 and Box 8). **Successfully fulfilling social responsibility commitments requires that all participants along supply chains, from brand and retail CEOs to seafood workers, are aware of human and labour rights risks, responsibilities, and rights.** Awareness building and training helps to communicate company social responsibility goals throughout supply chains and ensure that they are translated into practice for workers. Training and education allows violations to be more quickly identified and reported, and increases employee and supplier motivation to implement best practices.

Collaboration with industry leaders, government agencies, NGOs, business partners, human rights experts, and trade unions can help companies reach greater levels of impact by sharing costs, increase supply chain leverage, and address complex issues pre-competitively.

Companies can support public policy change by engaging with governments to promote regulations, conventions, and other legal frameworks that protect human and labour rights for workers, including migrant workers. **Currently, fishing vessels are excluded from the majority of international convention provisions that protect workers' rights.** Businesses can use their leverage and influence to drive ratification of the policies and conventions to protect fishers' working rights.

Box 8.

Action 4. Build capacity to implement best practices

Step 1: Train throughout the supply chain

Buyer steps

- Train CEOs, directors, and buyers on risks.
- Train suppliers (including beyond first tier) in company supply chains on expectations and implementation of due diligence mechanisms, applicable legal and regulatory requirements, and data collection processes that can help identify areas of supply chains with the greatest risks.
- Offer suppliers information, education, guidance to help raise supplier awareness, recognition, and correction of issues.

Employer steps

- Train supervisors, workers and other relevant staff in social compliance, including: applicable legal and regulatory requirements, data collection processes, workplace rights, and company grievance and remediation policies.
- Train subcontractors on expectations and implementation of due diligence mechanisms, applicable legal and regulatory requirements, and data collection processes that can help identify areas of supply chains with the greatest risks.

Resources:

RISE - [Building and training for a social compliance system](#)

Global Aquaculture Alliance - [Training Courses for Social Responsibility](#)

Verité - [Free elearning courses on forced labor and human trafficking](#)

Stronger Together - [Tackling Forced Labour Training for Businesses](#)

Step 2: Engage in collaborative efforts to systematically make improvements

Buyer steps

- Participate in collaborative initiatives with other stakeholders including companies, trade unions, government agencies, NGOs/CSOs, and others.
 - Institute an iterative and ongoing process of stakeholder engagement, identifying opportunities for collective action with other companies, trade unions, government agencies, NGOs, and multi-stakeholder initiatives. These activities provide companies educational, outreach, and stakeholder engagement opportunities to learn from and dialogue with stakeholders across fields.
 - Advocate for public policy change.
- #### Employer steps
- Partner with and support local and civil society organizations that protect and advocate for workers' rights.
 - Explore the referral hub to learn about local civil social organizations working on the ground that can help to engage in improvements.
 - Support government initiatives and international agreements that promote best practices for social responsibility in global supply chains.

Resources:

Verité - [Evaluating Multi-stakeholder Initiative Potential to Combat Trafficking in Persons](#)

Other - [Seafish Common Ethics Language Group](#)

Other - [The Responsible Labor Initiative](#)

Other - [The Leadership Group for Responsible Recruitment](#)

Other - [The Ethical Trading Initiative](#)

Figure 6: Communicating about Policies, Expectations, and Progress Actions



Communicating about policies, expectations, and progress begins with making a public commitment to socially responsible seafood

(Figure 6; Action 1 and Box 9). Companies can begin by defining their core values in relation to human rights and establishing priorities for addressing social issues in seafood. Finding a champion of social responsibility within the company is an important element of the successful development and implementation of company commitments. Such leadership provides support and an imperative to continue to strengthen and improve company social responsibility practices.

In addition, designating a "social responsibility team" that can talk about the marketing, compliance, and social good benefits of company social responsibility practices helps to generate long-term commitment to such policies. This may also involve educating leadership and buying teams on human rights risks in seafood in order to raise awareness about the types of human and labour risks that exist in seafood supply chains.

As a company begins to work on social responsibility improvements, it is important to invest time to identify the company's priorities, ambitions, and goals in regards to social responsibility. There is no singular way to craft a social responsibility commitment. **Companies should develop policies and commitments that are tailored to their goals, capacity, and**

operations, while aligning with industry best practice and international standards whenever possible.

As a best practice, a social responsibility commitment specifically addressing human and labor rights generally contain the following five components:

1. A general statement of commitment to protecting human rights
2. A commitment to uphold international guidelines
3. A statement of specific social responsibility provisions protected
4. A public expression of how a company will achieve its commitment with time-bound benchmarks and measurable indicators of improvement
5. The company's expectations of suppliers throughout the supply chain via sourcing policies

Once a social commitment is crafted, companies should ensure it is communicated through appropriate channels to employees, suppliers, stakeholders, and the public. Transparency ensures accountability.

Box 9.

Action 1. Make a public commitment to socially responsible seafood

Step 1: Build company support for advancing social responsibility

Buyer & Employer steps

- Build support and make a business case for advancing social responsibility, determining what social responsibility criteria or issues are in line with company goals and strategy.

Resources:

RISE - [Identifying company social responsibility commitment priorities](#)

FishWise - [How Companies Benefit from Advancing Social Responsibility in Seafood](#)

United Nations Global Compact - [Business: It's Time to Act](#)

Step 2: Make a public commitment

Buyer & Employer steps

- Develop and share a public commitment to prioritize sourcing that meets social responsibility standards.

Resources:

RISE - [Crafting social responsibility commitments](#)

The second action is to set and communicate expectations with all members of company supply chains (Figure 6; Action 2 and Box 10). Once a social commitment is crafted, companies should ensure the commitment is communicated to all supply chain actors, employees, stakeholders, and the public through appropriate channels. Senior executives also play an important role in embedding social responsibility into company culture by upholding, executing, and being accountable to the commitment.

As a first step, a company should review, update, and communicate its policies to ensure supply chain actors agree to uphold company social responsibility commitments. If suppliers' policies do not adequately address social responsibility, the company should work collaboratively with suppliers to communicate their expectations and develop a system, including through restructuring of contracts and purchasing agreements, to ensure those expectations are met.

A Supplier Code of Conduct and Supplier Expectations Letter are both tools for companies to communicate their expectations regarding social responsibility within their supply chains.

A **Supplier Code of Conduct** should establish the non-negotiable minimum social responsibility expectations that a company has for its suppliers. Every supplier should be required to acknowledge the expectations laid out in the Supplier Code of Conduct and their ability to either meet or work towards meeting those expectations. Companies should work with suppliers that cannot immediately meet their expectations by making a time-bound improvement plan that strives for continual progress. In addition, you should also consider **your** responsibilities to suppliers through a [Buyer Code of Conduct](#). For example, you should examine your purchasing practices and business metrics, as a buyer, and make sure you're meeting the cost of production before entering into a contract. You should consider rewarding suppliers demonstrating verifiably more responsible practices by sourcing from them as a

preferred supplier, by committing to longer term contracts, longer lead times, shorter payment terms, and more fair cancellation terms.

A **Supplier Expectations Letter** should be sent to all suppliers that the company does business with and have a clear date that each supplier must return with acknowledgement of receipt. Companies should create a plan to follow up with suppliers that do not return a signed copy of the Supplier Expectations Letter, and a firm timeline where a supplier will have consequences if the letter is not signed and returned.

Contracts are an important tool for executing the Supplier Code of Conduct in practice. While contracts are not common practice across the industry, it is encouraged that workers are provided a written contract of employment specifying how their rights will be protected. Contracts should cover the conditions of employment and work, should be written in the worker's native language, and should be presented to workers before departure from the home country.

Contracts are expected to meet labour standards established by national law, and hold companies and suppliers accountable to protecting workers' rights as outlined by international bodies such as the ILO. The contract should incorporate a commitment to comply with the Supplier Code of Conduct, and specify all activities that the supplier is required to undertake to achieve compliance with that code, such as verification activities, audits, worker voice mechanisms, etc. Additionally, suppliers with stable supplier relationships may additionally stipulate in contracts that suppliers are required to train and ensure the social compliance of their subcontractors, providing support to subcontractors as needed through Corrective Action Plans. The contract should prohibit the use of any substitutions by the employer and stipulate a worker's right to terminate employment upon giving required notice. It is critical that documents are explained to workers if they are unable to read.



Box 10.

Action 2. Set and communicate expectations with all members of company supply chains

Step 1: Establish and communicate expectations

Buyer steps

- Communicate expectations to suppliers via a Supplier Expectation Letter and a Supplier Code of Conduct, including provisions for health, safety, humane working and living conditions for workers.
- Ensure suppliers are signatory to company Supplier Expectations Letter and Supplier Code of Conduct.

Employer steps

- Review all terms of Expectations Letters and Codes of Conduct to ensure understanding of company requirements.
- Develop own Code of Conduct in line with best practices and highest expectations of upstream operations.
- Establish contracts with workers.

Resources:

Walk Free Foundation - [Framework for implementing a communication strategy](#)

Walk Free Foundation - [Approaches to supplier management: Supplier engagement and management](#)
Verité - [Sample Supply Chain Assurance Program](#)
Verité - [Sample Social Responsibility Agreement for Seafood Supply Chains](#)
Verité - [Sample Code of Conduct Provisions for Seafood Supply Chains](#)

Step 2: Demonstrate and verify compliance

Buyer step

- Verify suppliers are meeting supplier expectations.

Employer step

- Verify subcontractors are complying with expectations contained within Expectations Letters and Codes of Conduct.
- Provide data upstream as requested to demonstrate compliance.



The final action is to publicly track and report information on supply chains (Figure 6; Action 3 and Box 11). **Reporting is an essential element of social responsibility.** It constitutes a strategic tool to record and analyse information, present findings, express concerns, engage in dialogue, advocate positive change and propose recommendations for corrective action. A materiality assessment is a corporate social responsibility strategy aimed at identifying the environmental, social, and governance (ESG) issues that are most important to specific stakeholder groups (workers, consumers, and investors). The [UN Guiding Principles Reporting Framework](#) enables companies to respond to this growing array of requirements and expectations for improved reporting on social responsibility. It can also help companies meet their own commitment to continuous improvement in this area of their performance.

Box 11.

Action 3. Publicly track and report information on supply chains

Step 1: Determine gaps between company practices and best practices

Buyer & Employer steps

- Assess international frameworks for human and labour rights, social responsibility best practices, and legal compliance to inform strategy for tracking and reporting.

Resources:

Company Obligations: *Legality and Compliance*

Step 2: Conduct a materiality assessment for key stakeholder groups

Buyer & Employer steps

- Identify stakeholder groups that have a fundamental impact on business operations and financial profit and loss.
 - o Examples of stakeholder groups include: employees, workers in supply chains, consumers, financial institutions and investors, insurance providers, supply chain partners (e.g. suppliers, brokers, importers), government oversight organizations, and environmental and human and labour rights NGOs.
- Conduct a materiality assessment to identify the environmental, social and governance (ESG) issues that are most meaningful for stakeholder groups.

Resources:

Antea Group - *7 Basic Steps for Conducting a Successful Materiality Assessment*

GRI - *Sustainability Reporting in the Food Processing Sector*

Assent Compliance - *Corporate Social Responsibility: A Quick Start guide to CSR and Your Supply Chain*

UN Global Compact - *Guide to Corporate Sustainability: Shaping a Sustainable Future*

Step 3: Publicly report on progress

Buyer & Employer steps

- Provide key stakeholder groups with the rationale for specific social responsibility priorities based on the results of the materiality assessment.
- Establish baselines and set goals with clear timelines for improvement.
 - o Be transparent and honest
 - o Provide real-life examples and create case studies when possible
- Report on progress against both the baseline and the goal annually.

Resources:

The Guardian - *Corporate transparency: why honesty is the best policy*

GRI - *G4 Sustainability Reporting Guidelines*

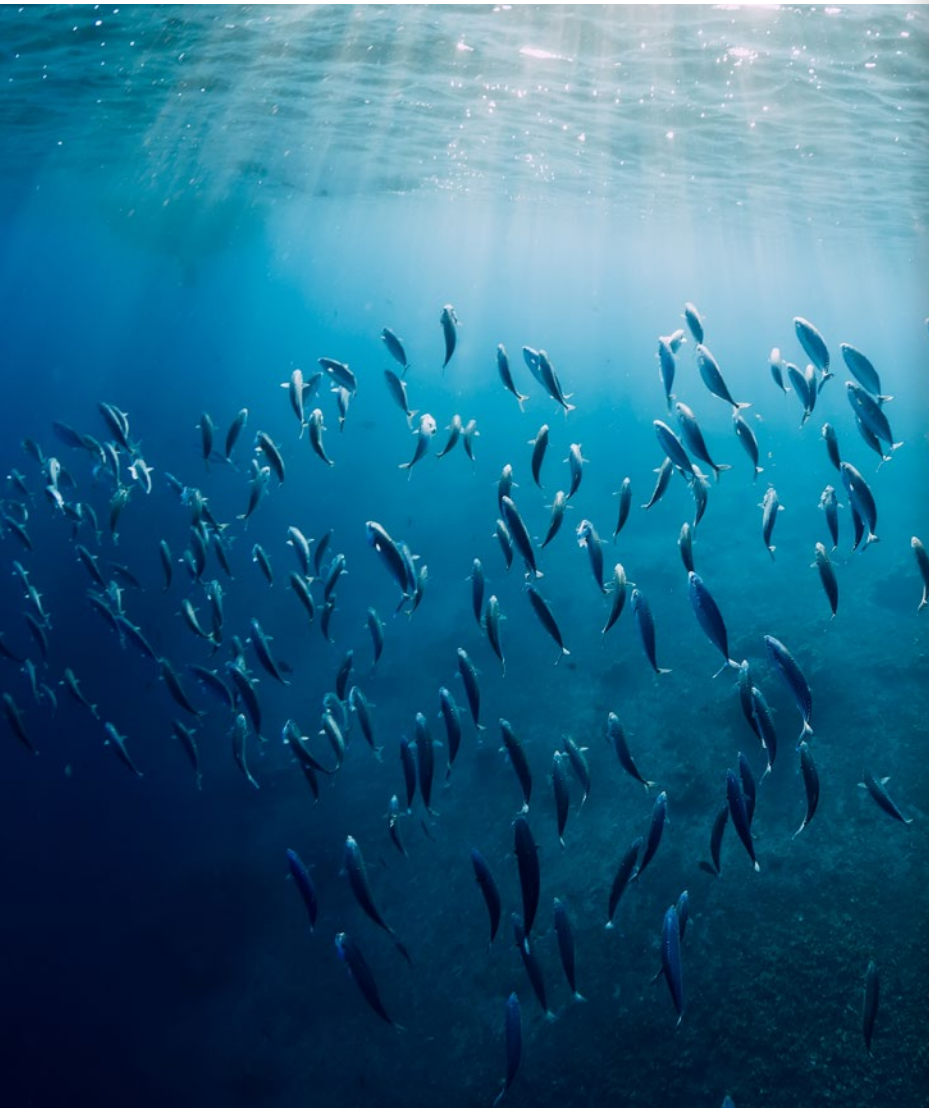
Office of the United Nations High Commissioner for Human Rights - *Manual on Human Rights*

Monitoring: Human Rights Reporting

United Nations - *Guiding Principles Reporting Framework with Implementation Guidance*

Webinar - *Introduction to the UN Guiding Principles Reporting Framework*

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Visit:

riseseafood.org
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