



Social Responsibility Toolkit

November 2021



ABOUT THE GLOBAL TUNA ALLIANCE

The GTA was created as a sector wide, multi-stakeholder initiative of partners to build a shared, global and non-competitive solution to sustainability issues in the global tuna supply chain.

Vision - tuna ultimately meets the highest standards of environmental performance and social responsibility

Our vision is delivered through active engagement with decision-makers in these areas and through GTA Partners' sourcing practices.

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ABOUT THE ROADMAP FOR IMPROVING SEAFOOD ETHICS

Created by FishWise with the support of the Walmart Foundation, RISE helps companies to navigate human and labour rights challenges and create the conditions for decent work across seafood supply chains.

RISE is built specifically for the seafood industry and addresses this industry's unique challenges and opportunities.

PURPOSE OF THE TOOLKIT

The aim of this toolkit is to provide support to GTA Partners, and 2025 Pledge towards Sustainable Tuna (25PST) signatories make progress on social responsibility.



An aerial photograph of the ocean, showing a large wave with white foam cresting over turquoise water. The water transitions from a deep blue at the bottom to a lighter turquoise near the wave. The foam is bright white and textured.

THE ROADMAP



THE CONCEPT

Social responsibility is becoming increasingly important to consumers. In addition to environmental sustainability, seafood companies are now also committing to implement responsible business practices throughout their supply chains. However, knowing how to begin—or continue—this opaque, global, collaborative work is challenging.

The Roadmap for Improving Seafood Ethics ([RISE](#)) meets companies' evolving needs by taking the guesswork out of implementing responsible business practices. The RISE Roadmap includes clear, actionable guidance with eight simple steps to build a comprehensive social responsibility program.

The United Nations Guiding Principles on Business and Human Rights establish the responsibility of businesses to address adverse impacts to human rights. The RISE Roadmap clearly articulates the human rights due diligence-based approach required for this work. With the Roadmap, seafood companies may implement practices to detect, prevent, mitigate, and remediate negative human rights impacts in their supply chains. Risks to business operations will be identified and preempted where possible, including issues identified by outside groups (e.g., journalists or advocacy organizations), operational disruption, and the costs of managing conflicts.

STEPS

COMMIT

- **ACTION 1:** Develop a transparent and time-bound commitment aligned with international standards and recognized best practices
- **ACTION 2:** Measure progress and share your company's impact
Global Social Compliance Programme: Reference tool on Social & Labour Management
- **ACTION 3:** Share the commitment publicly

LEARN

- **ACTION 1:** Learn about human rights abuses in seafood
- **ACTION 2:** Identify high-level opportunities for improvement within your company
- **ACTION 3:** Build internal support for advancing social responsibility
- **ACTION 4:** Train employees on social responsibility expectations

ASSESS

- **ACTION 1:** Conduct an assessment of human rights risks
- **ACTION 2:** Gather additional information on the ground
- **ACTION 3:** Engage global and local stakeholders to expand assessment of working conditions
- **ACTION 4:** If the appropriate safeguards are in place, engage directly with workers

BUILD CAPACITY

- **ACTION 1:** Establish processes to resolve issues and prevent future noncompliance
- **ACTION 2:** Build interoperable traceability systems
- **ACTION 3:** Establish long-term sourcing agreements
- **ACTION 4:** Support worker engagement by requiring effective grievance mechanisms and encouraging freedom of association and collective bargaining for all seafood workers

COLLABORATE

- **ACTION 1:** Engage in diverse, collaborative efforts to accelerate and scale improvements
- **ACTION 2:** Advocate with governments and other regulatory bodies

REMEDiate

- **ACTION 1:** Ensure timely remedy and successful corrective actions for verified worker grievances
- **ACTION 2:** Reimburse recruitment fees and related costs paid by workers. Establish mechanisms and safeguards to eliminate worker-paid recruitment and other illegal fees.
- **ACTION 3:** Reimburse or bear the costs of worker repatriation

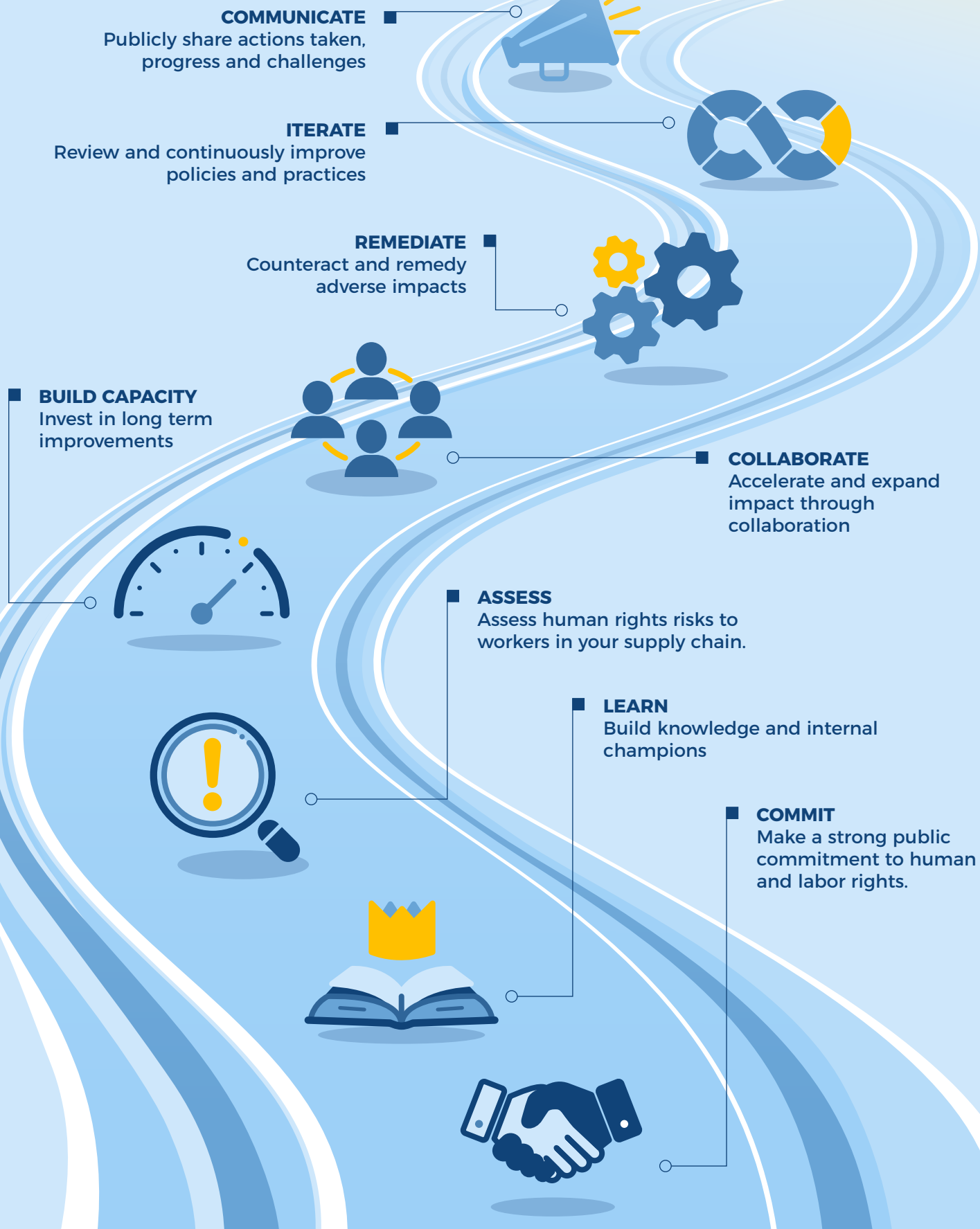
ITERATE

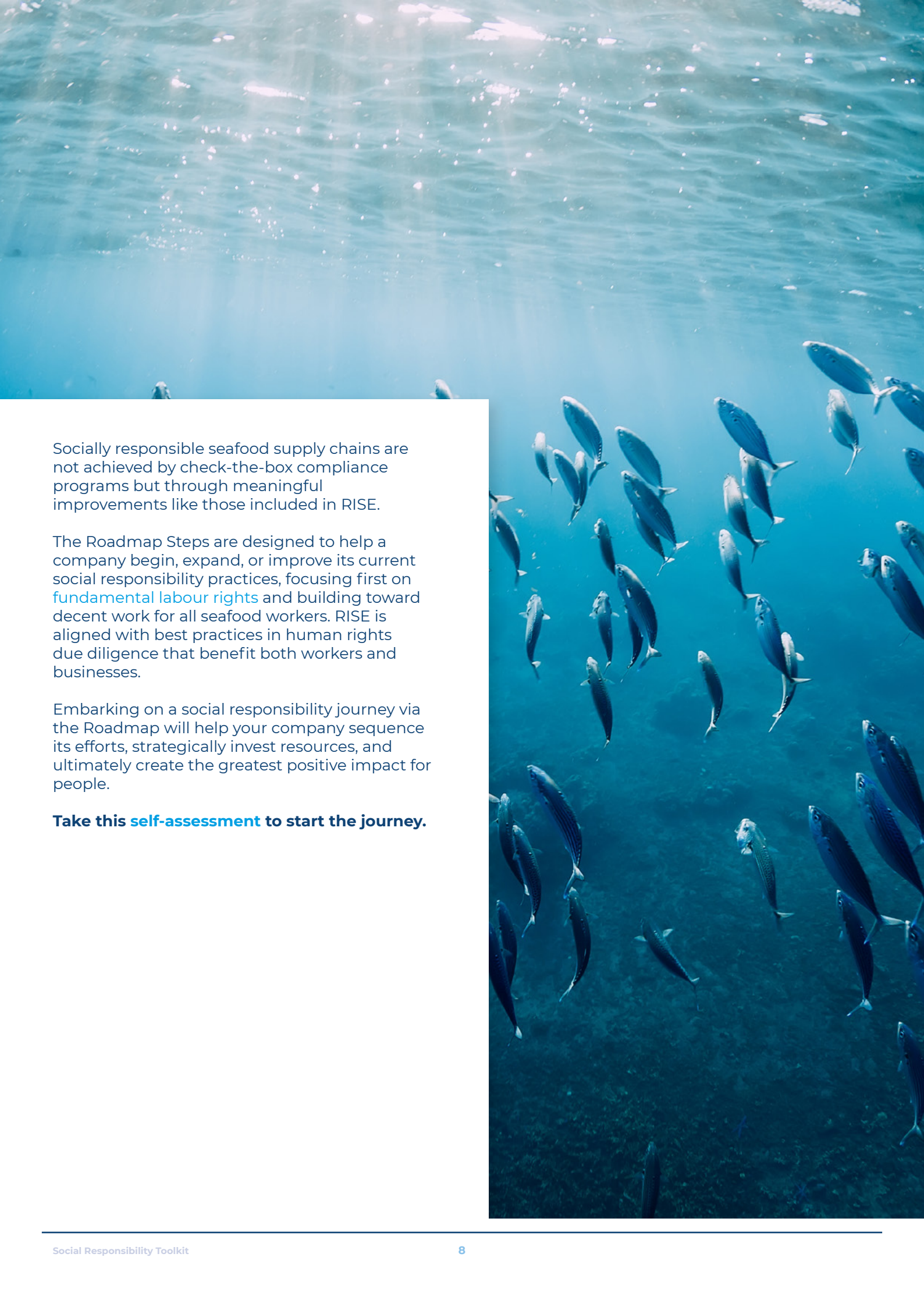
- **ACTION 1:** Regularly assess the quality of your company's human rights due diligence policies and practices and seek opportunities for improvement

COMMUNICATE

- **ACTION 1:** Publicly report your company's efforts to protect human and labour rights
- **ACTION 2:** Report instances of remediation.
- **ACTION 3:** Report instances of successful and unsuccessful corrective action plans.

THE ROADMAP





Socially responsible seafood supply chains are not achieved by check-the-box compliance programs but through meaningful improvements like those included in RISE.

The Roadmap Steps are designed to help a company begin, expand, or improve its current social responsibility practices, focusing first on [fundamental labour rights](#) and building toward decent work for all seafood workers. RISE is aligned with best practices in human rights due diligence that benefit both workers and businesses.

Embarking on a social responsibility journey via the Roadmap will help your company sequence its efforts, strategically invest resources, and ultimately create the greatest positive impact for people.

Take this [self-assessment](#) to start the journey.

COMMIT

*Make a strong public
commitment to human
and labour rights*

*It is better to learn, improve, or
even fail than not to commit
at all.*

READY TO TAKE ACTION?

ACTION 1:

Develop a transparent and time-bound commitment aligned with international standards and recognized best practices

- Align with international frameworks for human rights and seafood, including the:
 - United Nations (UN) [Guiding Principles on Business and Human Rights](#).
 - International Labour Organisation's (ILO) [Decent Work Agenda](#), [Core Conventions](#), and the [ILO Work in Fishing Convention, 2007 C. 188](#).
 - ILO Protocol of 2014 to the Forced Labour Convention, 1930 P029.
 - ILO General principles and operational guidelines for fair recruitment and definition of recruitment fees and related costs.
- Use existing models and resources. For example:
 - Global Compact Network Netherlands, Oxfam and Shift's [Examples of Policy Commitments](#).
 - Conservation Alliance for Seafood Solutions' [Business Commitments to Social Responsibility](#).
- Identify and address issues that may be found in your company's seafood supply chains. Consider aligning with credible NGO recommendations and advocacy campaigns, such as:
 - Greenpeace Sustainability, Labour & Human Rights, and Chain of Custody Asks for Retailers, Brand Owners and Seafood Companies.
 - International Labour Rights Forum's [Taking Stock Report](#), "Essential Elements of Effective Social Responsibility in the Seafood Sector."
 - Oxfam's [Ripe for Change Reports](#) and [Behind the Barcodes Supermarket Scorecard](#).
 - KnowTheChain [Food and Beverage Benchmarks](#).
 - Issara Institute's [Assessing Five Years of Impact and Trends in Worker Voice and Responsible Sourcing](#).
- Include processes to investigate and remediate any violations of your company's corporate human rights commitment, including credible grievances raised by workers.

- Achieving remediation and recruitment goals may require sector- or issue-wide collaborations between companies.
- For more information about remediation, see [Remediate](#).
- To learn more about collaborating within your company's supply chain, see [Build Capacity](#).
- For more information about collaborating with organizations outside your company's supply chains, see [Collaborate](#).
- Ensure commitments apply to your company's entire seafood supply chain (i.e., beyond direct suppliers).

Background

- Verité:
 - [Sample Benchmarks of Good Practice in Recruitment and Employment for Seafood Supply Chains](#).
 - [Sample Code of Conduct Provisions for Seafood Supply Chains](#).
- Mekong Club: [Role of the private sector](#)

Resources

- RISE: [Crafting Social Responsibility Commitments](#).
- Conservation Alliance for Seafood Solutions: [Common Vision](#).

References

- Verité: [International Labour and Human Rights Standards for Fishing](#).
- ILO: [Conventions and Recommendations](#).



ACTION 2:

Measure progress and share your company's impact

- Create a plan to measure progress and develop time-bound goals where appropriate.
 - Identify the activities required to achieve the commitment (e.g., communicating with supply chains, gathering data, and supporting suppliers).
 - Determine data collection, validation, and verification needs (see [Assess](#), [Build Capacity](#), and [Iterate](#)).
 - Develop and support <supply chain traceability [[link traceability topic page](#)]> efforts to enable data collection and supply chain improvements.
 - Design time-bound, specific goals for improvement.
 - Start with the most salient risks and fundamental operations needs (e.g., receive signed codes of conduct from all suppliers within one year, validate responsible recruitment processes in all land-based seafood supply chains within two years).
- Identify and communicate the company's commitment with key stakeholders, including:
 - Workers, associations of workers such as trade unions, and other civil society organizations.
 - Business partners (e.g., first- and second-tier suppliers) through supplier expectations letters, codes of conduct, or other communications.
 - Organizations that may respond to the commitment (e.g., buyers, investors, and advocacy groups).

- Government agencies that may support critical human rights goals (e.g., Departments of Labour, Migration, Fisheries or Customs).
- Those with a vested interest in the company (e.g., shareholders).
- [Consultants and collaborating organizations](#) that may support the company in meeting its commitment.

Background

- UN Sustainable Development: [Chapter 5, Measuring Progress](#).
- Shift: [UN Guiding Principles Reporting Framework](#).
- Michelle Langlois, Shift, and Mazars LLP: [Reporting Trends and Insights: Who's Responsible and Accountable for Assessing Human Rights Risks Within the Company?](#)

Resources

- Consumer Goods Forum Global Social Compliance Programme:
 - [Reference tool on Social & Labour Management Systems for Suppliers: Chapter 5 – Implementation: translating strategy into effective policies and procedures](#).
 - [Reference tool on Supply Chain Social Performance Management Systems: Working with Suppliers](#).

References

- RISE: [Identifying social responsibility commitment priorities](#) ("What mechanisms, actions, and activities are needed to fulfill a commitment?", page 2).



ACTION 3:

Share the commitment publicly

- Share the commitment through the company website and other relevant outlets (e.g., media releases, annual reports, conferences, and blogs).
- Specify the scope of the commitment and its implementation or verification plan (e.g., “The commitment applies to all sourcing and supply chains;” “Data collection with direct suppliers is used to verify the commitment”).
- Include information about time-bound aspects of the commitment, as well as planned public follow-up regarding progress.

Guidance

- Shift and Mazars LLP: [UNGP Reporting Framework: Maturity Indicators and Methodology](#).

Resources

- Walk Free Foundation: [Framework for implementing a communication strategy](#).
- CORE with contributions from Anti-Slavery International, Business and Human Rights Resource Centre (BHRR), and Unicef UK:
 - [Recommended Content for a Modern Slavery Statement](#)
 - [Modern Slavery Reporting: Weak and Notable Practice](#)

References

- Shift: [Database and analysis of company reporting](#)

OPTIMIZE YOUR COMPANY'S PATH

• Retailers/Brands:

- Work directly with suppliers to understand exactly what is needed to achieve the commitments.
- Notify suppliers of new commitments and expectations with adequate time to meet the requirements of the commitment.
- See [Build Capacity](#) for more information and ideas.
- Inform consumers of commitments and progress through public reporting on company websites, media outreach, and product information at the point of sale.

Suppliers:

- [Align commitments](#) and improvements with those of key buyers (i.e., high volume, long-term buyers).
- Provide suppliers (including producers and processors) with adequate time to meet the requirements outlined in the commitment.

• Processors:

- Provide operations staff and suppliers with adequate time to meet the requirements outlined in the commitment.
- Align commitments and improvements with those of key buyers (i.e., high volume, long-term buyers).
- Act in good faith to meet commitments and, when challenges arise, clearly and proactively communicate those challenges to key buyers.

• Producers:

- Align commitments and improvements with those of key buying companies (i.e., high volume, long-term buyers).
- Act in good faith to meet commitments and, when challenges arise, clearly and proactively communicate those challenges to key buyers.
- Provide staff (e.g., planning and operations managers, captains, and other relevant crew, contractors, and labour recruiters) with adequate time to meet requirements outlined in the commitment.
- Provide at-sea operations, especially [distant water fisheries such as tuna](#), with additional time and support to implement and verify requirements as needed. See also [Decent Work at Sea Foundation page](#) for more guidance.
- Until robust verification can occur at sea, continue to utilize port visits to engage workers, iterate best practices for conducting port interviews with workers, and confirm commitments are met to the fullest extent possible.

Discover how other companies have applied the RISE Roadmap to improve their social responsibility practices.

See in-depth information regarding:

- Retailers
- [Suppliers](#)
- [Processors](#)
- and [Producers](#)

BUILD THE FOUNDATION

Responsible Recruitment:

- Commit to implementing responsible recruitment practices, including:
 - [Employer Pays Principles](#).
 - Disclosure to workers of all fees and related costs prior to accepting the job.
 - Reimbursement of recruitment fees and related costs previously paid by workers.
 - Remediation of recruitment-related issues.
- [Inform suppliers of recruitment-related commitments](#) through expectations letters or other communications.

Worker Engagement:

- Commit to implementing effective grievance mechanisms.
- Commit to upholding [ILO core labour rights](#), including the ability of workers to collectively bargain and freely associate.
 - If the right to free association is legally limited, commit to other forms of worker engagement, such as worker committees.
- Align commitments throughout the supply chain to achieve the long-term sustainability of worker engagement.
 - Incorporate commitments to effective grievance and worker engagement in supplier expectations.

Decent Work at Sea:

- Align company commitments to international guidelines for improving safety and work at sea, including the:
 - ILO: [Work in Fishing Convention C188](#).
 - Food and Agriculture Organization: [Port State Measures Agreement](#).
 - International Maritime Organization (IMO): [Cape Town Agreement](#).
 - IMO: [Standards for Training, Certification, and Watchkeeping for Fishing Vessel Personnel](#).

CONTENTS

LEARN

Build knowledge and internal champions

Watch your company's leadership and impact evolve by growing internal expertise and taking actions to improve.

READY TO TAKE ACTION?

ACTION 1:

Learn about human rights abuses in seafood

- Learn about documented human rights abuses in seafood.
 - Watch films like [Ghost Fleet](#), which shows stories of trafficking and redemption in Thailand's seafood industry.
 - Review [high-profile investigative](#) reports in prominent media outlets—examples of high profile reporting on seafood, human trafficking, and forced labour:
 - ◊ The Guardian: [Revealed: Asian Slave Labour Producing Prawns for Supermarkets in US, UK](#).
 - ◊ Associated Press: [Seafood from Slaves](#).
 - ◊ New York Times: [Outlaw Ocean](#).
 - ◊ Bloomberg: [The Fishing Industry's Cruellest Catch](#).
 - Review credible and well-researched NGO reports:
 - ◊ Greenpeace: [Choppy Waters - Forced Labour and Illegal Fishing in Taiwan's Distant Water Fisheries](#).
 - ◊ Environmental Justice Foundation: [Fear, Hunger, and Violence: Human Rights in Ghana's Industrial Trawl Fleet](#).
 - ◊ International Labour Rights Forum: [Time for a Sea Change: Why Union Rights for Migrant Workers are Needed to Prevent Forced Labour in the Thai Seafood Industry](#).
 - ◊ Solidarity Center: [The Plight of Shrimp Processing Workers of Southwestern Bangladesh](#).
 - Learn about corporate research and benchmarks:
 - ◊ Business and Human Rights Resource Centre: [Out of Sight: Modern Slavery in Pacific Supply Chains of Canned Tuna](#).
 - ◊ Seafood Business for Ocean Stewardship (SeaBOS): [Reporting and benchmarking of human and labour rights reporting](#).
- Explore lessons learned from [case studies](#), [pilots](#), and [other relevant projects](#), including experiences from other sectors.

Background

- RISE: [Glossary of human rights terms](#).
- Explore [key topics](#) in seafood. Mekong Club:

- How modern slavery impacts supply chains.
- Facts and Figures
- What makes up modern slavery
- Definitions
- Anti-Slavery Legislation 1 and 2

Resources

- UN:
 - Corporate Human Rights Due Diligence - Identifying and Leveraging Emerging Practice.
 - Universal Declaration of Human Rights.
- Verité: [An Ethical Framework for Cross-Border Recruitment](#).

References

- UN Guiding Principles on Business and Human Rights.
- International Labour Organization (ILO): [Core Conventions](#).
- Conservation International: [Driving Commitments to Social Responsibility in the Seafood Sector – The Monterey Framework, Pillar I](#).



ACTION 2:

Identify high-level opportunities for improvement within your company

- Identify areas in which your company's values, goals, and customer expectations align with opportunities to improve human rights policies and procedures.
 - Assess your company's policies and practices against human rights guidance, law, and regulation, including the UN Guiding Principles and national human trafficking and forced labour laws.
 - Compare current seafood policies, practices, and expectations against national human rights, corporate responsibility, and disclosure laws.
 - Review implications of trading goods associated with forced labour.
 - ◊ The U.S. government currently prohibits forced labour-associated products from import. Multiple [distant water fishing](#) products have been blocked upon entry in the past three years. See U.S. Customs and Border Protection [article one](#) (December 31, 2020), [article two](#) (August 18, 2020), [article three](#) (May 11, 2020), [article four](#) (February 6, 2019).
 - ◊ Companies should closely consider the reports issued by NGOs. U.S. government agencies have stated that these reports [may be a reference source used to initiate and investigate cases of forced labour](#).

Background

- UN Guiding Principles on Business and Human Rights.

Resources

- Consumer Goods Forum: [Business Actions Against Forced Labour – Case Study Booklet](#).

References

- U.S. Government Accountability Office: [Forced Labour: Better Communication Could Improve Trade Enforcement Efforts Related to Seafood](#).
- U.S. Customs and Border Protection: [Withhold Release Orders and Findings: "Other"](#).

ACTION 3:

Build internal support for advancing social responsibility

- Educate and engage corporate leadership on the risks associated with human rights abuses, particularly forced labour, in seafood supply chains. Discuss specific opportunities to strengthen social responsibility practices and the business benefits of doing so.
- Engage other internal decision-makers (e.g., seafood sourcing departments or directors) to identify the resources and expertise needed to improve social responsibility practices across the business.
 - Over time, build social responsibility improvements into employee performance metrics (e.g., benefits for buyers who incorporate social responsibility into seafood purchasing decisions).
 - Identify champions and empower them to establish initiatives that improve social responsibility practices throughout the company.

Background

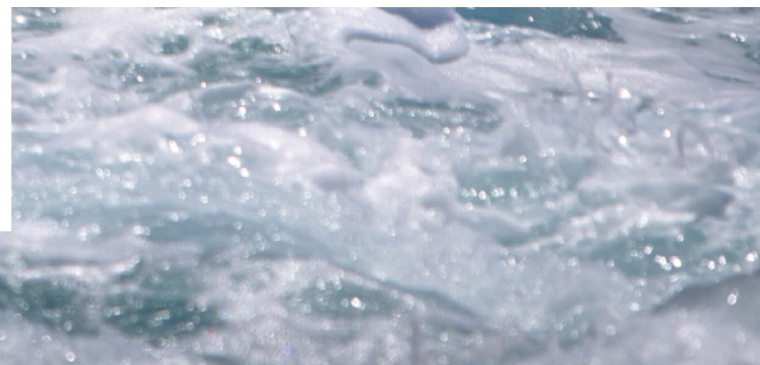
- KPMG: Resources for Addressing Human Rights in Business:
 - [Addressing human rights in business: Executive perspectives](#).
 - [Boardroom questions: Addressing human rights in business](#).

Resources

- World Business Council for Sustainable Development: [CEO Guide to Human Rights](#).

References

- FishWise: [How Companies Benefit From Advancing Social Responsibility in Seafood](#).
- United Nations Global Compact: [Business: It's Time to Act. Decent work, modern slavery, & child labour](#).



ACTION 4:

Train employees on social responsibility expectations

- Train employees within your company and, where possible, provide training for or share training materials with other companies and decision-makers within your supply chain. These might include:
 - Management staff (e.g., supervisors in processing facilities, captains on vessels).
 - Distribution workers such as truck drivers.
 - Procurement teams.
 - Subcontracting companies.
 - Recruitment agencies.
 - Workers who harvest, farm, or process seafood.
 - Other stakeholders within your company's manageable interest.
- Training topics may include:
 - Applicable legal and regulatory requirements.
 - Expectations of downstream customers.

- Salient human rights issues. Data collection to support risk assessments.
- Workplace rights, including freedom of association and collective bargaining. Grievance mechanisms.
- Recruitment practices. Remediation policies.
- Share guidance with suppliers on human rights topics, such as:
 - Best practice for recognizing and
 - remedying human and labour rights issues, and for protecting workers who share grievances from retaliation. Company expectations related to human and labour rights, including working conditions, living conditions, and payment systems for seafood workers.

Resources

- [RISE eLearning modules](#)



OPTIMIZE YOUR COMPANY'S PATH

Processors/Producers:

- Inform vessel, processing facility, and other seafood workers about their human and labour rights in the workplace and the company policies and practices related to these rights.
- Assign one or more staff members to learn about, inform improvements to, and lead social responsibility efforts to positively impact workers across company operations.

All companies:

- Use [RISE](#) to learn how to take a human rights due diligence approach to improving supply chains.
- Participate in [pre-competitive efforts and multi-stakeholder initiatives](#) that support industry-wide adoption of aligned goals and practices, reducing the likelihood of divergent human rights objectives.

- Consider hiring third-party experts to conduct training or identify due diligence improvements.
- Join a growing [community](#) to support industry-wide adoption of improved social responsibility practices.

Discover how other companies have applied the RISE Roadmap to improve their social responsibility practices.

See in-depth information regarding:

- [Retailers](#)
- [Suppliers](#)
- [Processors](#)
- and [Producers](#)

BUILD THE FOUNDATION

Responsible Recruitment:

- Understand [policies](#) and [practices](#) that contribute to unethical recruitment, including the [recruitment fees and related costs charged to workers](#).
- Train employees on [Employer Pays Principles](#), recruitment risks, and [ILO General Principles and Guidelines for Fair Recruitment](#).

Worker Engagement:

- Train staff and supply chain partners on core labour rights—including the right to collective bargaining and freedom of association—and the importance of access to effective grievance mechanisms.
- Share the [business benefits of worker engagement](#), such as staff retention, increased morale, and improved productivity.

- Ensure that workers have access to information on their rights and conditions of employment from recruitment to employment.
- Empower workers with training and resources to enable meaningful participation in monitoring labour conditions and engaging in improvement processes once on the job.

Decent Work at Sea:

- Learn about unique challenges to achieving decent work at sea, including the [hazards of fishing](#), the potential for [long periods at sea](#), and the challenges of [at-sea communications](#).
- Dedicate additional resources to improvements for at-sea operations.

[CONTENTS](#)

ASSESS

Assess human rights risks to workers in your supply chains

Assessments help your company prioritize its social responsibility efforts. The best human rights assessments include information from different sources, including workers.

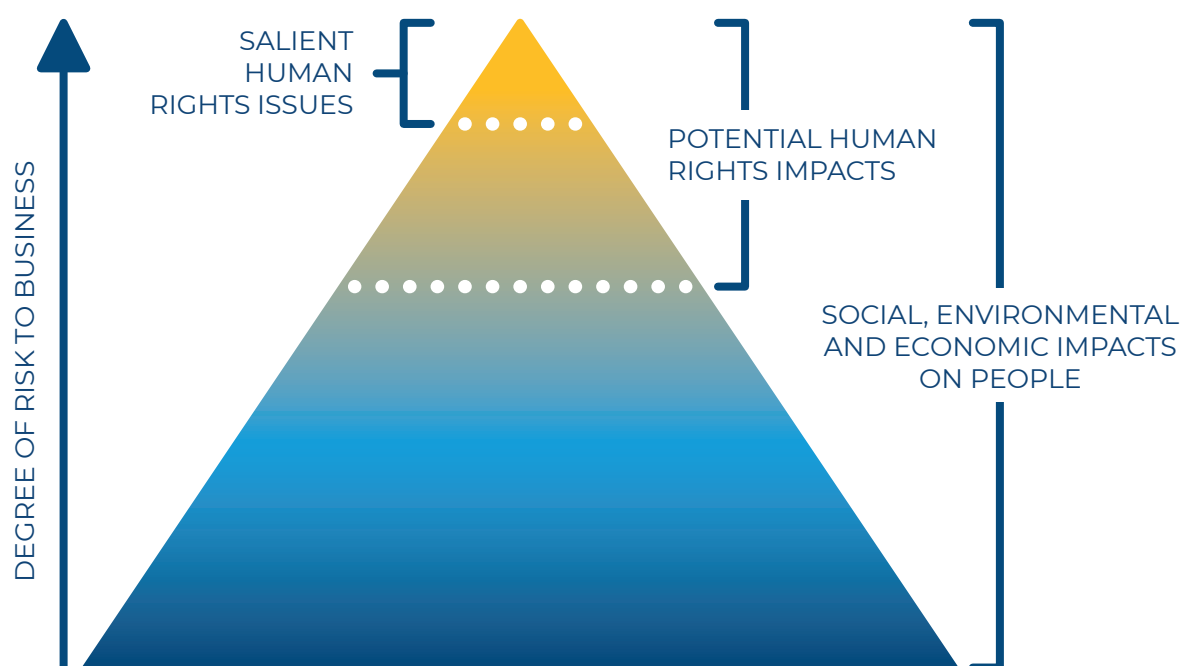
READY TO TAKE ACTION?

ACTION 1:

Conduct an assessment of human rights risks

- Use existing data to conduct a preliminary risk assessment:
 - Review company policies, codes of conduct, supplier expectations, and ensure alignment with international standards, best practices, and seafood expectations.
 - ◊ See [Commit](#) for more information about best practices.
 - Map existing supply chains, flagging products associated with [higher risk geographies](#), species, and production or harvest methods.
 - ◊ To start, identify all Tier 1 suppliers (i.e., suppliers the company purchases from directly). Prioritize the highest volumes of products associated with higher risk geographies, species, and production/harvest methods for further supply chain mapping.
 - ◊ Over time, work to map all suppliers, vendors, agents, and subcontractors to the vessel level, including:
 - ◊ Name of the company.
 - ◊ Name and location of the production facility (as relevant).
 - ◊ List of all products sourced from each facility.
 - ◊ Country of origin for all product(s).
 - Although not specific to the seafood industry, public tools such as the [Slavery and Trafficking Risk Template](#) can help companies with preliminary desk-based assessments. Seafood-specific risk guidance is included in Verité's [Risk Assessment Guidance for the Seafood Supply Chain](#). Other risk assessment tools are noted in the table below.
- Assess supplier risks:
 - ◊ Review supplier codes of conduct, human rights policies, and commitments for gaps against your company's requirements.
 - ◊ Send suppliers a self-assessment questionnaire to determine compliance with your company expectations.
 - ◊ Self-assessments are a standard due diligence practice to understand supplier risks and mitigation practices. However, self-reported information should be verified or validated through additional data sources (ideally including input from workers or their representatives) to verify accuracy.
 - ◊ Tools such as Verité's [Sample Seafood Supplier/Subcontractor Self-Assessment](#) can be used to support the development of a questionnaire.
- Identify the most salient risks:
 - From your company and supplier assessments, identify the products associated with the most severe human rights impacts. If necessary, use an internal metrics system (such as a scale or rating system that includes supplier, product, and production information) to track or measure risk.
 - ◊ The UN Guiding Principles on Business and Human Rights assess the [salience of a human rights issue](#) using four factors: "most severe," "potential," "negative," and "impacts on human rights"—placing the focus on risk to people rather than on risk to the business.
 - ◊ For more information on salient human rights issues in seafood, see [RISE Topics](#) and the [RISE Foundations](#).
 - Prioritize suppliers of high-volume or high-value products for deeper engagement to ultimately reach all suppliers associated with high and moderate-risk products.
 - ◊ Issue a request for information to suppliers associated with the high-risk supply chains to assess how risks are mitigated.
 - ◊ Ensure suppliers are managing and addressing the risks to an extent that meets your company's expectations.





Source: Risk salience (Shift and Mazars LLP: [UNGP Reporting Framework: Salient Human Rights Issues](#)).

Risk Assessment: Tools, Metrics, and Resources by Source of Risk

Geographic	Species	Production & Harvesting
What country- or fishery-level risks for human trafficking and forced labour may exist?	Is the species or raw material associated with illegality or documented human or labour rights violations?	Is the product produced or harvested via methods known to contain risks unique to the seafood industry?
Tools: <ul style="list-style-type: none"> - Social Responsibility Alliance (SRA): Slavery and Trafficking Risk Template - Seafood Slavery Risk Tool 	Tools: <ul style="list-style-type: none"> - "Sweat and Toil" App - Seafood Slavery Risk Tool 	Tools: <ul style="list-style-type: none"> - Social Responsibility Assessment Tool
References: <ul style="list-style-type: none"> - Measurement, Action, Freedom Report - U.S. Trafficking in Persons Report - Corruption Perceptions Index - International Trade Union Confederation 2019 Global Rights Index - Worldwide Governance Indicators for Voice and Accountability 	References: <ul style="list-style-type: none"> - Media investigations - U.S. Department of Labour's: List of Goods Produced by Child Labour or Forced Labour 	References: <ul style="list-style-type: none"> - Database on reported incidents of abandonment of seafarers - Flags of convenience - IUU vessel lists - Vessels subjected to U.S. withhold release orders (see "Other")
		Metrics: <ul style="list-style-type: none"> - Distant water fishing - Transshipment at-sea - Duration of vessel voyage - Undocumented steps like peeling sheds, subcontracted facilities, etc.

Background

- Shift and Mazars LLP: [UN Guiding Principles Reporting Framework: Reporting Trends and Insights: Are Companies Taking a Principled Approach or Are They Cherry Picking?](#)
- Mekong Club: [Supply chain transparency 1 and 2](#)

Resources

- Liberty Shared: [Seafood Slavery Risk Tool](#)
- [Social Responsibility Assessment Tool](#)
- U.S. Department of Labour: [Sweat & Toil: Child Labour, Forced Labour, and Human Trafficking Around the World](#)
- Canopus Business Management Group: [Lean Six Sigma Certification Course: Risk Analysis](#)

References

- Verité: [Responsible Sourcing Tool: Information Gathering and Risk Assessment in Seafood Supply Chains](#)



ACTION 2:

Gather additional information on the ground

- Conduct an audit, site visit, or other activity to verify compliance with corporate commitments.
 - Include document reviews, interviews, site tours, or other necessary activities. Social compliance audits that do not include workers' perspectives should be considered less accurate than audits that do.
 - ◊ See [Audit and Certification](#) for more information about the value and limitations of social audits.
 - Use third-party or independent social auditors with specific expertise in social compliance, interacting with workers, and the local region.
 - ◊ Organizations such as the Association for Professional Social Compliance Auditors provide resources for [auditor competencies](#).
 - ◊ Auditors should be in good standing and certified or accredited to deliver audits and certifications against the standard used.
 - ◊ Practical memos for [internal](#) and [external](#) auditors conducting assessments of human rights performance can be found in Shift and Mazars LLP's: [UN Guiding Principles Assurance Guidance](#).
 - Identify areas for improvement and develop corrective action plans with time-bound expectations.
 - Support suppliers in addressing risks and building onsite capacity. Request regular progress updates.
 - ◊ See [Build Capacity](#) for more information on corrective action plans and supplier engagement.
- Consider conducting an enhanced investigation of risk in consultation with local stakeholders.
 - If audits are not available or required by your company or its buyers, or if your company wants to supplement existing audits or certifications, consider an in-depth risk assessment conducted in consultation with local groups.
 - Undertake a determination of actual and potential human rights risks using the [Social Responsibility Assessment Tool](#)

(SRA) Tool to assess [fishery improvement projects \(FIPs\)](#) or other regional fisheries systems.

- ◊ Ensure an evaluation team with social science research experience, including human rights and wellbeing protocols, conducts the assessment.
- ◊ Use a worker-driven approach to assessing labour conditions. Workers, fishers, farmers, and their representatives should be involved in the evaluation and consequent program design.

Background

- RISE: [The role of social audits in a comprehensive due diligence program](#).

Resources

- Verité: [Third-Party Standards in Seafood Relevant to Human Trafficking](#).
- Shift and Mazars LLP:
 - [UN Guiding Principles Assurance Guidance](#).
 - [Some translations are also available](#).
- Walk Free Foundation:
 - [Questions to Ask During an Audit to Identify Labour Violations](#).
 - [Example Questions to Ask Employees During a Social Audit](#).
- Resources for FIP implementers and similar fisheries:
 - [Social Responsibility Assessment Tool](#)
 - Social Responsibility Assessment Toolkit Templates:
 - ◊ Pre-assessment forms
 - ◊ Vessel assessment and physical inspection templates
 - ◊ Document review guides
 - Conservation International Center for Communities and Conservation Train the Trainer Modules
 - Conservation International and Verité: [Enhancing Capacity to Detect and Address Labour and Human Rights Issues and Risks in the Seafood Supply Chain](#)

References

- Shift: [From Audit to Innovation: Advancing Human Rights in Global Supply Chains](#).

ACTION 3:

If the appropriate safeguards are in place, engage directly with workers

- Ensure that your company only allows direct [worker engagement](#) if there are mechanisms in place to act upon the [information received](#) and the safety and security of workers can be guaranteed.
- Collectively identify:
 - Inclusive models for worker engagement in that region or facility.
 - Appropriate information to collect on working conditions.
 - Safeguards to protect the privacy and safety of workers, particularly against retaliation for grievances identified.
 - Existing grievance mechanisms that are useful for and used by workers.
 - Mechanisms for safe, effective remediation when risks are detected or grievances are reported.
 - Review the [Updated Guide to Ethics and Human Rights in Anti-Human Trafficking](#) for more information.
- To safely and effectively cultivate relationships with workers, establish:
 - Protections against retaliation and mechanisms for remediation.
 - See [<Build Capacity>](#) and [<Worker Engagement>](#) for more information about addressing risk and engaging with workers.

Background

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

References

- Issara Institute: [Updated Guide to Ethics and Human Rights in Anti-Human Trafficking.](#)

Resources

- Issara Institute: [What is Worker Voice in the Context of Global Supply Chains?](#)



ACTION 4:

Engage global and local stakeholders to expand the assessment of working conditions

- Collaborate with regional partners:
 - Identify organizations that support human and labour rights in countries of production. Consider regional outposts of global organizations as well, such as local unions with global affiliations.
 - Learn about the services provided by various local organizations, and determine which organizations are most aligned with your company's goals.
 - Develop formal relationships through contracts, memorandums of understanding, or other methods of agreement.
- Collaborate with other supply chain partners:
 - Extend data collection requirements to all supply chain companies through supplier expectations letters and codes of conduct.
 - Communicate to suppliers about the data that will be requested of them. Maintain updated documentation about working conditions and labour rights in supply chains.
 - Implement data collection and worker engagement processes that involve safe worker participation, if not already in place.
- Collaborate with global partners:

- Work with expert organizations or initiatives to understand the ethical issues associated with collecting data from vulnerable populations and weigh the benefits and risks.
 - ◊ Implement ethical standards and approaches for working with migrant workers and trafficked persons.
- Support and advocate for convenings that bring together workers, trafficking survivors, grassroots organizations, trade unions, employers, recruiters, and global brands and retailers. Through these convenings, establish meaningful dialogue and collective action, prioritizing [worker-led models](#).

Background

- Issara Institute: [Updated Guide to Ethics and Human Rights in Anti-Human Trafficking](#).

Resources

- ILO: [A Handbook for Employers and Business, Chapter 4 "A Checklist and Guidance for Assessing Compliance."](#)

References

- Global Compact Network Netherlands, Oxfam and Shift: [Doing Business with Respect for Human Rights. Stakeholder Engagement, "Making it Meaningful"](#) (Chapter 3.7).



OPTIMIZE YOUR COMPANY'S PATH

• Retailers/Brands:

- To start, focus on practices for gathering data, publicly available risk information, and due diligence practices across the many suppliers that contribute to your company's sourcing.
 - ◇ Work with key suppliers (i.e., high volume, long-term) while assessing specific high-risk supply chains.
 - ◇ If sourcing from importers, collect additional data to understand the requirements importers have with their own sourcing companies.

- Ask importers to share sourcing practices of vessels, farms, other producers, and processors from which they source to establish transparency and traceability.
- Collaborate with other retailers or brands that source from similar regions or suppliers for in-person assessments if possible.
- If your company sources and sells multiple commodities, understand the human rights risks unique to seafood (e.g., [at-sea work](#)).

• Suppliers:

- Maintain an accurate and centralized list of all products purchased and the companies from which they are purchased.
- If sourcing from importers, collect additional data to understand the requirements importers have with their own sourcing companies.
 - ◇ Ask importers to share sourcing practices of vessels, farms, other producers, and processors from which they source to establish transparency and traceability.
- If your company sources and sells multiple commodities, understand the risks unique to seafood (e.g., [at-sea work](#)).
- Develop systems to store and easily access data so that information can be readily taken in from sourcing companies and conveyed to buyers.

• Processors/Producers:

- Document company processes to improve social responsibility and mitigate risks. Align data collection with the data required by key buyers (i.e., high volume, long-term).
- Develop systems to store and easily access data so that information can be readily taken in from sourcing companies and conveyed to buyers.
- Track instances of worker grievances (e.g., questions to human resources, complaints through trade unions) as they may reveal risks for labour abuse, and resolve worker grievances internally.



BUILD THE FOUNDATION

Responsible Recruitment:

- Assess recruitment-related risks in supply chains, such as fees and related costs, labour protections in countries of employment, and the prevalence of migrant and other potentially vulnerable workers (e.g., women, seasonal workers) in the workforce.
- Map labour recruitment in supply chains.
- Evaluate [recruitment practices throughout your company's supply chains](#), as verified by workers themselves.

Worker Engagement:

- Collect data on issues raised by workers in the risk assessment, and use this information when identifying [salient issues](#).
 - o Companies that collect data from workers must also be prepared to verify and [remedy](#) reported instances that violate company policy.
- If issues are not raised through grievance processes and worker engagement, utilize publicly available information from civil

society or worker-support organizations to determine whether risks are actually absent or the grievance and worker engagement mechanisms are ineffective.

Decent Work at Sea:

- Flag high-risk seafood supply chains in assessments, including fishing on vessels in international waters (e.g., tuna) that may be under-monitored and seafood that uses 'trash fish' for feed.
- Encourage vessels in your company's supply chain to participate in public [vessel lists](#) and, to the extent possible, share vessel information with buyers.
- If vessel information is available, utilize vessel transparency platforms such as [Global Fishing Watch](#) to review vessel-level risks.

CONTENTS

BUILD CAPACITY

Invest in long-term improvements

*All journeys begin with a
single step. Start with the
improvements your company
is able to make now, then
broaden your scope over time.*

READY TO TAKE ACTION?

ACTION 1:

Engage in supply chain improvements with suppliers

- Work alongside suppliers to create the opportunity for real and lasting improvement in supply chains:
 - Establish processes to identify operational issues with suppliers.
 - Develop and implement corrective mechanisms to resolve company-level operational issues.
 - ◊ E.g., failed audits, not providing data to buyers, other instances of non-compliance.
 - Share corrective processes, including time-bound expectations and follow-up plans to confirm corrective actions.
 - Connect issues to broader systems management improvement plans.
- Attempt to implement improvements with suppliers prior to terminating the business relationship.
 - Ensure the necessary support is available for suppliers to implement improvements.
 - Set agreed upon consequences for chronic failure to meet commitments.
- Identify local stakeholders that may support supply chain companies' efforts to meet company and legal requirements.
 - The [RISE Community](#) includes organizations supporting social responsibility across the globe.

Background

- [Verité: A Guide to Corrective Action and Systems Improvement Planning.](#)

Resources

- Verité:
 - [Developing a Strategy for Corrective Action and Systems Improvement Planning.](#)
- [Fair Hiring Toolkit "Taking Corrective Action and Developing Systems Improvements.](#)

References

- Verité: [Fair Hiring Toolkit.](#)

ACTION 2:

Build interoperable traceability systems

- Develop and implement interoperable, electronic traceability systems (or support existing traceability efforts) to encourage transparency between supply chain actors.
 - Traceability is a critical tool for improving logistical efficiency, verifying sustainability and social responsibility claims, and ensuring products are produced legally.

Background

- [RISE Traceability Topics Page](#)

Resources

- Global Dialogue on Seafood Traceability: [GDST 1.0 Standards and Materials.](#)
- Future of Fish:
 - [Taking the First Steps Toward Full-Chain Traceability.](#)
 - [Organizational Traceability Capacity Questionnaire.](#)

References

- FishWise, Future of Fish, IFT GFTC, and WWF: [Recommendations for Addressing Seafood Traceability and Key Data Elements.](#)



ACTION 3:

Establish long-term sourcing agreements

- Identify products and supply chains with potential for long-term contracts or sourcing agreements.
 - Long-term contracts offer the following benefits:
 - ◊ Supply chain resilience against disruption.
 - ◊ Risk mitigation through more transparent and easily traceable sourcing.
 - ◊ Efficiency gains (i.e., a potential reduction in staff time spent seeking out or establishing partnerships with new suppliers).
 - ◊ More secure inventory of socially responsible, sustainable, or innovative products in which the company has invested.
 - Elements of long-term contracts may include:
 - ◊ Timeframe longer than one year, with built-in mechanisms for extension.
 - ◊ Specifications regarding quantity, quality, and parameters for determining price of the product purchased.
 - ◊ Specifications regarding social responsibility, sustainability, impact to workers or the land, and other shared priorities.
 - ◊ Resolution and conflict management processes.
 - ◊ Non-exclusivity clauses and insurance against non-compliance.
- Support long-term suppliers to implement

improvements through regular communication of successes and challenges, fair pricing of goods, and shared compliance and verification costs.

- Trial supply chain improvements through pilots with long-term suppliers, with the intention of scaling, if successful.
 - Pilots provide the following benefits to companies:
 - ◊ Calculated investments that may inform future practices or provide long-term payoffs.
 - ◊ Opportunities to share specific supply chain challenges and gains through public communications.
 - ◊ Increased understanding of supply chain challenges and potential next steps.

Background

- SSRN, Mendeley, and Elsevier: [Supply Networks for Relational Sourcing](#).

Resources

- INSEAD: [Creating a Socially Responsible Supply Chain](#).
- United Nations Industrial Development Organization (UNIDO): [The UNIDO Approach to Sustainable Supplier Development – Promoting CSR for SMEs in a Global Supply Chain Context](#).

References

- The Markets Institute at WWF: [How Long-Term Contracts Can Help Drive More Sustainable Agriculture](#).
- UNIDO's [Pilot CSR interventions in Small and Medium-sized Enterprises](#).



ACTION 4:

Support worker engagement by requiring effective grievance mechanisms and encouraging freedom of association and collective bargaining for all seafood workers

- Ensure that seafood workers are able to safely access trusted, effective grievance or worker voice mechanisms; ensure that safeguards exist to protect workers' confidentiality and prevent retaliation, recrimination, and dismissal.
 - Prepare to respond to grievances or human rights abuses with time-bound corrective action plans. These plans should resolve the operational issues contributing to the grievances and reduce the likelihood of similar problems.
 - ◊ See [Remediate](#) for more information about remedying wrongs to workers.
 - Form partnerships with local stakeholders to resolve grievances and implement improvements.
 - If no grievance procedure is in place, [review examples](#) and determine structures that may work best for your company.
 - ◊ Created by Global Compact Network Netherlands, Oxfam, and Shift, [Doing Business with Respect for Human Rights: Remediation and Grievance Mechanisms](#), includes detailed information about establishing grievance protocols.
- Uphold seafood workers' right to freely associate and promote seafood workers' access to collective bargaining through trade unions. In countries with legal limitations to the rights to associate and bargain, or in sectors with limited unionization (such as work on the high seas), other forms of association or collective negotiation may need to be encouraged and fostered.
 - Utilize worker committees, trade unions, and worker voice programs to solicit worker feedback even when a grievance has not been reported.
 - Encourage global government and regulatory alignment with the International Labour Organization's [fundamental principles and rights at work](#), including freedom of association and the right to organize and collectively bargain, through collaborations and advocacy.

Background

- Verité: [What makes a grievance mechanism effective?](#)
- RISE: [Foundation: Worker Engagement](#).
- RISE: [Giving workers a voice in supply chains – Freedom of Association & Collective Bargaining](#).
- International Labour Organization: [Q&As on Business and Freedom of Association](#).
- Issara Institute: [What is Worker Voice in the Context of Global Supply Chains?](#)

Resources

- UN Human Rights Office of the High Commissioner: [Designing and implementing effective company-based grievance mechanisms](#).
- Verité: [How to evaluate the effectiveness of grievance mechanisms](#).
- ETI:
 - [Entry points to worker representation](#).
 - [Freedom of association & collective bargaining implementation roadmap](#).

References

- ILRF: [Taking Stock: Labour Exploitation, Illegal Fishing and Brand Responsibility in the Seafood Industry](#): This report lays out four “Essential Elements of Effective Social Responsibility in the Seafood Sector” to build an effective human rights compliance program.



OPTIMIZE YOUR COMPANY'S PATH

- Retailers/Brands/Suppliers:
 - Establish frequent, transparent, and supportive dialogue with supply chains regarding social responsibility progress, corrective actions, and other improvements.
 - ◊ Engage with suppliers to implement improvements before cutting business ties.
 - Require suppliers to uphold [seafood workers' rights to freedom of association and collective bargaining](#).
 - Leverage market power to advocate for policies that support freedom of association and collective bargaining for seafood workers.
 - ◊ Join [multi-stakeholder](#) initiatives to maximize leverage.
 - Invest in high-risk or high-volume sourcing regions through pilots.
 - Implement long-term sourcing agreements or other sourcing strategies to reinforce and strengthen supply chains.
- Processors/Producers:
 - Partner with local human rights and civil society organizations to support worker engagement mechanisms.
 - Encourage collective bargaining and freedom of association for workers at your company, or alternative forms of engagement where not legally permissible (e.g., worker committees).
 - Ensure safe and legal working conditions, living conditions, and payment systems in company operations, and comply with relevant laws, codes of conduct, and seafood worker contracts.

Interested in learning about all RISE steps from the perspective of your company type?

See in-depth information regarding:

- [Retailers](#)
- [Suppliers](#)
- [Processors](#)
- and [Producers](#)



BUILD THE FOUNDATION

Responsible Recruitment:

Ensure grievance mechanisms are inclusive of issues that occurred during the recruitment process.

Invest in [pilots](#) or [research](#) regarding recruitment practices in your company's supply chains or regions of focus.

Worker Engagement:

At minimum, ensure [effective grievance mechanisms](#) in your company's supply chains. Share information about the resolution of grievances and corrective action plans regarding grievances with workers to build trust and encourage engagement.

- Invest in establishing or scaling effective grievance mechanisms.

Consider shared grievance mechanisms with other companies, including pooling funds to reimburse workers or provide other forms of remedy.

Proactively remove barriers to [freedom of association](#) and [collective bargaining](#) in your company's operations.

- Provide suitable mechanisms for ideas and concerns to be communicated from workers to management.
- [To the fullest extent allowed by law](#), there should be no negative repercussions for organizing.
- Grant trade unions representing workers access to the workplace as appropriate.

Decent Work at Sea:

Ensure vessel workers receive training on safety, working conditions, rights at sea,

payment, and other relevant information prior to departure.

- Participate in initiatives to train vessel workers and owners, such as those provided by the [International Maritime Organization](#) or [International Labour Organization](#), as well as industry-focused collaborations like the [Seafood Task Force](#) and [International Seafood Sustainability Foundation](#).

Invest in pilot projects and field-test new technologies on vessels, especially for the following high-priority topics:

- Worker connectivity and effective grievance mechanisms at sea.
- Electronic monitoring technologies that can be used to gather risk data and increase transparency.

Support long-term improvements for at-sea work, including establishing and verifying safe living and working on vessels.

- Consider the advancements that can be made to existing processes, such as [port interviews with workers](#).

Work with civil society organizations to improve the ability of workers on distant water fishing vessels to freely associate and participate in collective bargaining. Build traceability systems to begin at the vessel and feed segment of seafood supply chains.

CONTENTS

COLLABORATE

*Accelerate and expand
impact through
collaboration*

*Elevate your vision and
catalyze change at scale by
collaborating across supply
chains and sourcing regions.*

READY TO TAKE ACTION?

ACTION 1:

Engage in diverse, collaborative efforts to accelerate and scale improvements

- Join pre-competitive collaborations and other initiatives that support social responsibility improvements.
Engage various stakeholders in improvements, including standard-setting bodies, international agencies, NGOs, civil society organizations, trade unions, and other groups.
- Consider a memorandum of understanding (MOU) between employers and trade unions or other employee representatives.
 - ◊ Examples include the [ACT on Living Wages](#) MOU signed by the global union IndustriALL and member companies to establish collective agreements addressing wage-fixing in the 2garment industry.

Background

- Verité: [Fair Hiring Toolkit - Multi-stakeholder Engagement](#).

Resources

- RISE: [Multi-stakeholder initiatives focusing on social responsibility and traceability](#).
Verité: [Evaluating Multi-stakeholder Initiative Potential to Combat Trafficking in Persons](#).

References

- ILO: [Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy](#).

ACTION 2:

Advocate with governments and other regulatory bodies

- Promote regulations, conventions, and other legal frameworks that protect human and labour rights and promote decent work for all seafood workers.
- Prioritize major [seafood production countries](#), [key regions](#), and [oceans](#) to promote regulations that improve

conditions for workers in seafood production and processing.

- Prioritize major [seafood import countries](#) for regulations that encourage [human rights due diligence](#) and [trade in legal seafood](#).
- Support government initiatives and international agreements that promote best practices for social responsibility in global supply chains through advocacy letters, meetings, and other forms of engagement.
- The [Community](#) includes information about pre-competitive collaborations and multi-stakeholder initiatives.

Background

- RISE: [Engaging with governments](#).

Resources

- Verité:
 - [Fair Hiring Toolkit - Public Policy Advocacy](#).
 - [Summary of International Social Conventions in the Seafood Sector](#).

References

- Cambridge University Press: [Silence as Complicity: Elements of a Corporate Duty to Speak Out Against the Violation of Human Rights](#).
- Institute for Human Rights and Business: [Can Business Leaders Be More Effective Human Rights Advocates?](#)



OPTIMIZE YOUR COMPANY'S PATH

- Retailers/Brands:

- Work with [pre-competitive and collaborative initiatives](#) that align multiple companies' seafood goals and improve supply chain practices.
- Engage with governments to promote the adoption of regulations, conventions, and other legal frameworks that protect human and labour rights.
- Partner with organizations supporting and advocating for labour rights, ensuring that workers' voices are centered in policy-making, advocacy, and other decision-making.
 - ◊ For multinational brands and retailers: work with groups such as international trade unions to develop [Global Framework Agreements](#).

- Suppliers:

- Undertake collective advocacy with other suppliers to strengthen leverage and engagement with governments to promote the adoption of regulations, conventions, and other legal frameworks that protect human and labour rights.
- Partner with organizations supporting and advocating for labour rights, ensuring that workers' voices are centered in policy-making, advocacy, and other decision-making.
 - ◊ Support civil society organizations that protect and advocate for seafood workers' rights at local and international levels (see [RISE Community](#)).

- Processors/Producers:

- Partner with and support civil society organizations that protect and advocate for workers' rights in seafood and other seasonal jobs that may share a workforce.
- Explore the RISE Community to learn about local civil society organizations working on improvements in your company's regions of interest.

Interested in learning about all RISE steps from the perspective of your company type? See in-depth information regarding:

- [Retailers](#)
- [Suppliers](#)
- [Processors](#)
- and [Producers](#)



BUILD THE FOUNDATION

Responsible Recruitment:

- Encourage peers and other companies to support the [Employer Pays Principles](#), including through joining [collaboratives](#) such as the [Leadership Group for Responsible Recruitment](#).
- Advocate for strengthened [protections during the migration process](#), especially in countries that send or receive large numbers of international workers.
- [Collaborate](#) with [workers and civil society organizations](#), including worker groups and trade unions, to identify specific needs and improvements in key regions or sectors.
 - Prioritize organizations that are familiar with the local context, language, and may have already established trust with the community

Worker Engagement:

- Advocate for all seafood workers' right to collectively bargain and freely associate, regardless of immigration status.
- Support the legal right of workers and civil society organizations to report on and make claims of workplace abuse without fear of retribution.

- Establish dialogue and build trust with trade unions, workers networks, and local communities.

Decent Work at Sea:

- Encourage flag and port states to ratify the four pillars of fishing vessel safety, if they have not already, and implement standards:
 - [ILO Work in Fishing Convention No. 188](#).
 - [FAO Port State Measures Agreement](#).
 - [IMO Cape Town Agreement](#) (See "Status of Treaties").
 - [IMO Standards for Training, Certification, and Watchkeeping for Fishing Vessel Personnel](#) (See "Status of Treaties").
- Support the development of implementation guidance on decent work or social responsibility at sea (e.g., [PAS 1550](#))
- Encourage fisheries management bodies, including those with limited social mandates, to [set labour standards for crew](#) (even if voluntary).

CONTENTS

REMEDiate

Counteract and remedy adverse impacts

*Support the people in your
supply chains by righting
wrongs and fixing the broken
practices that allow wrongs to
occur in the first place.*

READY TO TAKE ACTION?

ACTION 1:

Ensure timely remedy and successful corrective actions for verified worker grievances

- Prepare to provide a range of support.
 - Remediation needs of workers can range from immediate needs such as food, clothing, health and safety, to more involved, long-term needs including formal employment, psychosocial support, socio-economic stability, and legal assistance.
 - Both civil and criminal remedies should be made available to workers, including the costs of return for a worker to engage in proceedings where the harm occurred.
- Establish a process to collect, investigate, and verify workplace grievances.
 - Ensure processes are transparent, yet confidential, and communicate to workers about the grievances received.
 - ◊ While verifying the accuracy of grievances is essential, do not put an undue burden of proof on workers.
 - ◊ Ideally, when a grievance is received, it is investigated as needed but assumed honest and accurate.
 - Review [Build Capacity Action 2](#) if your company needs to establish grievance mechanisms.
- Implement or support processes for the remediation of worker grievances throughout your company's seafood supply chains.

- ◦ Many companies may receive price benefits from labour abuses associated with cost-cutting (e.g., forced labour, debt bondage, etc.). Companies should include the costs of remediation in business operations and encourage peers and companies they purchase from to do the same.
- Document steps taken to investigate and remedy a claim, tracking the outcomes and settlements of worker grievances. Implement and document corrective actions taken to remedy the root causes of workplace grievances.

Background

- Human Rights at Sea: [Video on Effective Remedy](#).
- IHRB: [Remediation and Operational-Level Grievance Mechanisms](#).

Resources

- Ethical Trading Initiative: [Access to remedy: Practical guidance for companies](#).

References

- Shift: [UN Guiding Principles on Business and Human Rights: Access to Remedy](#).

ACTION 2:

Reimburse recruitment fees and related costs paid by workers. Establish mechanisms and safeguards to eliminate worker-paid recruitment and other illegal fees.

- Establish and implement processes to [identify and document recruitment fees and related costs paid by workers](#).
- Ensure payments are received by workers.
 - Pay salaries through a bank account supplemented with a written or electronic payslip to facilitate transparency and monitoring.
 - Confirm that workers are the owners of and have full, unhindered access to the bank accounts listed.
- Document steps taken to prevent future fees and related costs from being incurred by workers, including partnering with trusted [recruitment agencies that implement ILO guidelines](#) or moving [recruitment efforts in-house](#).
- [Incorporate the costs for reimbursement into payments to suppliers](#) and other companies in the supply chain.

Background

- ILO: [Video on Recruitment Fees and Related Costs](#).
- RISE: [Responsible Recruitment Foundation page](#)

Resources

- Impactt:
 - [Ethical Recruitment: Translating Policy into Practice](#).
 - [Repayment Standards for Migrant Worker Recruitment Fees and Related Costs](#).
 - [Webinar: Practical Steps to Repayment of Recruitment Fees as Remedy for Forced Labour](#).

References

- ILO:
 - [Global Study to Define Recruitment Fees and Related Costs](#).
 - [General Principles and Operational Guidelines for Fair Recruitment](#).
 - [Migration for Employment Recommendation \(R86\)](#).

ACTION 3:

Reimburse or bear the costs of worker repatriation

- Commit to repatriating workers at the end of their tenure with the company, facility, farm, or vessel, so they do not face risks of stranding [in remote regions or with limited legal protections](#).
 - Establish and implement processes to repatriate workers upon the termination of their contracts, regardless of which party initiates the termination.
 - Do not leave workers in a country where they do not have the appropriate legal documents or protections.
 - Consider bearing or repaying the costs of repatriation in certain instances that are still fair to workers (e.g., the worker has legal protections in the travel countries, a fair agreement of this nature was stipulated in the contract, etc.).
- Gather supply chain data or third-party information on an ongoing basis regarding the risks of workers being stranded outside their country of citizenship during their course of work.
 - Sources of data and information include media and news, updates from local advocacy groups, and reports from civil society organizations or government agencies.
- Document the steps taken to prevent future workers from incurring repatriation fees or being stranded.

Background

- AP: [More than 2,000 Enslaved Fishermen Rescued in 6 Months](#).

Resources

- International Transport Workers' Federation (ITF) Global: [Guide to the ILO Work in Fishing Convention](#).
- ILO and IMO: [Database on reported incidents of abandonment of seafarers](#).

References

- ILO: [Work in Fishing Convention C. 188](#).

OPTIMIZE YOUR COMPANY'S PATH

• Retailers/Brands/Suppliers:

- o Require that all companies in the supply chain document and promptly respond to human and labour rights grievances raised by seafood workers.
- o Work collaboratively with suppliers to develop corrective action plans, addressing immediate issues and root causes.
- o Establish a timeline and process to verify improvements. See [Build Capacity Action 4](#).
- o Commit funding to support improvements and provide remedy to seafood workers for verified claims.
- o Contribute to the development of processes that remediate worker grievances regardless of whether your company owns the facilities.
 - ◇ Collaborate with corporate peers sourcing from similar regions or suppliers.
 - ◇ Support suppliers, processors, and producers to implement grievance mechanisms and consider developing

• joint mechanisms.

- o Develop processes to verify grievance claims.
Ensure mechanisms for remedy are included.

Processors/Producers:

- o Investigate and remediate worker grievances, including setting funds aside for corrective action plans, remediation, repatriation, remuneration, and the provision of any other necessary resources as applicable.
 - ◇ Work with buyers and other companies in the supply chain to co-develop and support the grievance process.
- o Track remediation outcomes and settlements.
- o When improvement opportunities are identified, embed effective solutions into management systems to prevent reoccurrence.

BUILD THE FOUNDATION

Responsible Recruitment:

- Follow the guidance in [\[Remediate Action 2\]](#) to eliminate recruitment fees and implement good recruitment practices.

Worker Engagement:

- Remediate issues raised through worker engagement, including but not limited to formal grievance mechanisms, worker hotlines, and any issues raised by trade unions, committees, or other workers' associations by following the guidance in [Remediate actions 1- 3](#).

- o Workers or their representatives should participate in verification of remedy.

Decent Work at Sea:

- Provide channels for remediation for seafood workers who may return from at-sea trips to different countries than those in which the vessel or employer is located.
- [Reimburse or bear the costs of worker repatriation](#).

CONTENTS

ITERATE

*Review and
continuously improve
policies and practices*

*Grow your company's impact
by refining the approach over
time.*



READY TO TAKE ACTION?

ACTION 1:

Regularly assess the quality of your company's human rights due diligence policies and practices and seek opportunities for improvement

- Continuously improve upon prior supply chain initiatives and collaborate with other stakeholders to stay aligned with the most up-to-date best practices and evolving legal requirements.
- Assess the efficacy of your company's due diligence, including [three aspects outlined by Shift](#):
 - the quality of a company's human rights risk identification and prioritization processes.
 - the quality of its engagement with affected stakeholders.
 - the quality of its actions to address salient human rights issues, including setting meaningful targets and collaborating with others to use leverage.
- Regularly review the best practices and asks of companies developed by civil society organizations, including but not exclusive to the following:
 - [Greenpeace Sustainability, Labour & Human Rights, and Chain of Custody Asks for Retailers, Brand Owners and Seafood Companies](#).
 - [Oxfam's Ripe for Change Reports and Behind the Barcodes Supermarket Scorecard](#).

- [KnowTheChain benchmarks](#), specifically for the food and beverage sector.

Background

- Shift has developed [key considerations](#) that companies committed to respecting human rights should keep in mind. These include incentivizing robust due diligence measures through accountability (beyond liability) and assessing the quality of human rights due diligence measures.
- Strengthen the quality of human rights due diligence, such as outlined in Shift's "[Signals of Seriousness](#)" for Human Rights Due Diligence.

Resources

- Shift: [Leadership, Governance, and Culture: Gearing company culture to respect human rights](#).

References

- Shift:
 - [The problem with how we measure business respect for human rights](#).
 - [Accountability as part of Mandatory Human Rights Due Diligence](#).
 - ◊ [Key Considerations](#).

CONTENTS

OPTIMIZE YOUR COMPANY'S PATH

- All companies, including retailers/brands, suppliers, processors, producers:
 - Continue to review, improve, and understand the efficacy of current policies, commitments, and practices, including:
 - ◊ A need to reassess salient human rights risks, taking into consideration newly available public or supply chain data, legislation on human rights, or global initiatives.
 - ◊ Any additional actions your company might take given its size and resources.
 - ◊ Any ineffective measures your company can cease to implement.
 - ◊ Actions that your company can undertake alone versus with other stakeholders, especially if new collaborations have formed.
- Create a schedule and cycles for review to ensure consistency and progress.
- Use RISE to explore resources and guidance and implement best practice.

BUILD THE FOUNDATION

Responsible Recruitment:

- Work to achieve the following practices:
 - Workers do not pay recruitment fees or related costs, and the [ILO's general principles for fair recruitment](#) are met.

Worker Engagement:

- [Work to achieve](#) the following practices:
 - Recognize the rights to freedom of association and collective bargaining.
 - Engage in ongoing, meaningful consultation and communication with workers, worker representatives, and governments.
 - Establish procedures to collect, investigate,

and resolve grievances within the seafood supply chain.

- Participate in procedures to settle industrial disputes where relevant.
- [More information from the ILO can be found here.](#)

Decent Work at Sea:

- Work to achieve the following practices:
 - At-sea segments of company supply chains meet or exceed the standards outlined in [ILO Convention No. 188, the Work in Fishing Convention](#).

CONTENTS

COMMUNICATE

Publicly share actions, progress, and challenges

Tell your story. Inspire other companies to follow your lead and undertake their own journeys toward a more socially responsible seafood future.

READY TO TAKE ACTION?

ACTION 1:

Publicly report your company's efforts to protect human and labour rights

- Establish baselines and set measurable goals with clear implementation timelines. See [Commit](#) for more information.
- Report annually on progress, including seafood-specific examples. Share commitments, pre-competitive actions, challenges, and measurable progress through annual reports, blogs, and other media.
- Participate in conferences, convenings, and interviews to share information about company efforts and raise awareness for global human rights issues and (e.g., human rights abuses experienced by migrant workers, dangers of at-sea work, silencing of workers' experiences).

Background

- Elements of successful communication:
 - Transparency.
 - Honesty.
Includes real-life examples or case studies.
- Benefits of successful communication:
 - Shares accomplishments with a wide range of stakeholders.
 - Positions your company as a changemaker, with associated benefits.

Resources

- Stichting Global Reporting Initiative (GRI) and the UN Global Compact: [Integrating the SDGs into Corporate Reporting: A Practical Guide](#).
- Shift and Mazars LLP: [UN Guiding Principles Reporting Framework with implementation guidance](#).

References

- Office of the United Nations High Commissioner for Human Rights: [Manual on Human Rights Monitoring: Chapter 13 Human Rights Reporting](#).

ACTION 2:

Report instances of remediation

- In aggregate or anonymized, publicly report

- instances in which the company investigated and remediated or supported remediation of human rights and labour issues, including workplace grievances and recruitment fees.
- Reporting can occur through annual reports, on the company website, or through other public databases.

Background/Resource/Reference

- Shift and Mazars LLP: [UN Guiding Principles Reporting Framework: Remediation C6.5](#).

ACTION 3:

Report instances of successful and unsuccessful corrective action plans

- Publicly report, in aggregate or anonymized, instances in which the company needed to implement corrective action plans (CAP) related to labour and human rights issues for its vessels and facilities or through those of its suppliers.
- For CAPs with suppliers: publicly report cases, in aggregate or anonymized, in which sourcing relationships ceased due to a supplier's inability or unwillingness to implement corrective action plans. Reporting may occur through annual reports, on the company website, or other public databases.

Background

- Shift: [Human Rights Reporting: Are companies telling investors what they need to know?](#)

Resources

- Green Electronics Council: [Purchasers Guide for Addressing Labour and Human Rights Impacts in IT Procurements, 'Reporting' section](#).

References

- The Coca-Cola Company's Human Rights Report 2016-2017, "The Top 10 Findings in Audits..."
- Pepsico, Inc.: [Human Rights Report 2019, Our Commitment to Human Rights](#), "Top 5 Non-Compliance Categories."

OPTIMIZE YOUR COMPANY'S PATH

- Retailers/Brands:
 - o Communicate publicly through a company website, social media channels, and point of sale materials.
- Suppliers:
 - o Communicate regularly regarding efforts with buyers, such as retailers, brands, food service, or restaurants.
- Processors/Producers:
 - o Communicate regularly regarding your company's efforts with buyers, such as distributors, suppliers, retailers, brands, food service, or restaurants.
- All companies:
 - o Report on progress towards company commitments and goals annually.
 - o Share learnings and challenges along the way.

BUILD THE FOUNDATION

Responsible Recruitment:

- Communicate publicly regarding [specific initiatives undertaken by the company to support Employer Pays Principles](#) and other responsible recruitment practices, including the reimbursement of recruitment and related fees.

number of worker committee meetings conducted, and other ways that the company is engaging workers.

- Share the [benefits of freedom of association and collective bargaining](#) for reducing labour and human rights abuse.

Decent Work in Seafood:

Worker Engagement:

- Report the number and type of grievances raised, including how grievances were identified, resolved, or other outcomes.
- Report the conditions outlined in any current collective bargaining agreements, the

- Communicate about challenges and accomplishments specific to sourcing from fishing vessels.

CONTENTS

THE RISE FOUNDATIONS

The RISE Foundations are the essential building blocks of a seafood company's social responsibility program. While companies may face different human rights risks within their supply chains, some challenges are common across the seafood industry. By implementing

responsible recruitment policies and practices, developing meaningful worker engagement programs, and fostering conditions for decent work at sea, seafood companies minimize human rights risks and maximize opportunities to create value for workers.

RISE is built upon 3 core foundations:

1

Responsible Recruitment

Companies ensure that workers are voluntarily recruited into their supply chains through legal and ethical processes, with worker safeguards and transparency built into the hiring process. Workers do not pay fees to secure a job.

2

Worker Engagement

Companies establish processes to meaningfully engage workers in developing and implementing relevant policies, protocols, and practices. Workers or their representatives are consulted to contribute and verify data in a human rights due diligence process.

3

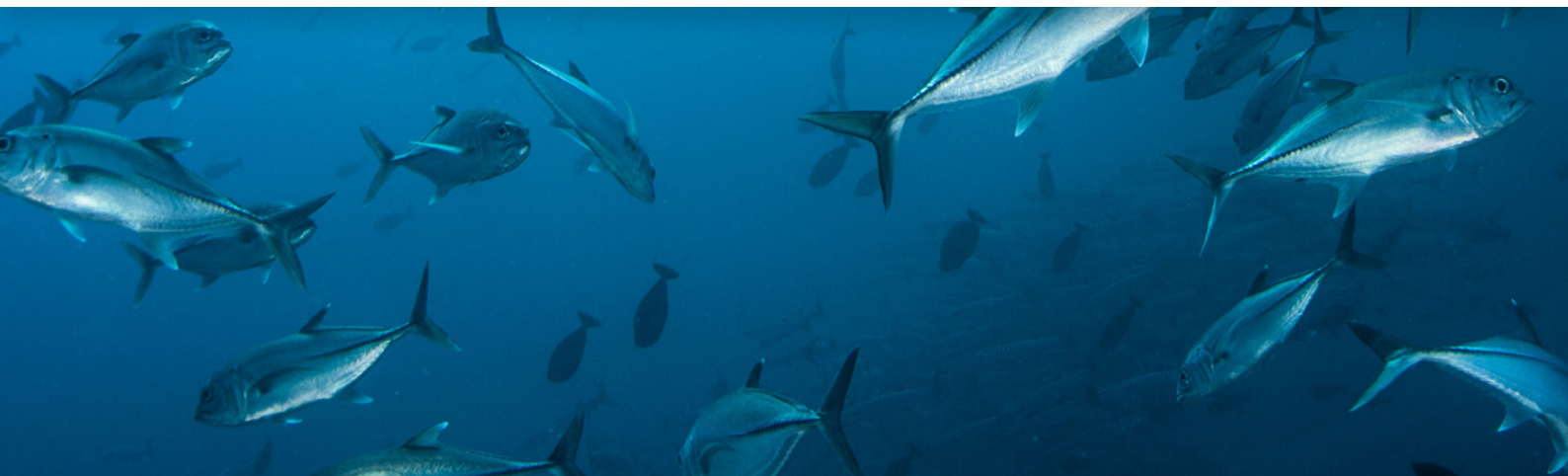
Decent Work at Sea

Companies provide at-sea workers access to resources and protections equivalent to those of workers on land, especially given the dangerous and often remote nature of fishing. Seafood products are traceable to the vessel.

Seafood companies that prioritize these Foundations, alongside ongoing human rights due diligence, will develop stronger social responsibility programs and accelerate progress toward the [ILO Decent Work Agenda](#),

[UN Guiding Principles on Business and Human Rights](#), and [UN Sustainable Development Goals](#).

Learn about the [RISE Steps](#)



RESPONSIBLE RECRUITMENT

*Respecting the rights
of workers starts
with responsible
recruitment and hiring*

WHAT IS RESPONSIBLE RECRUITMENT?

Responsible recruitment—sometimes referred to as ethical or fair recruitment—refers to concepts, initiatives, and supporting structures that uphold migration with dignity. Complementary actions from companies and governments are important due to governance gaps that leave workers and job seekers vulnerable to exploitation during or due to migration for work.

- Explore more: Institute for Human Rights and Business (IHRB) [Dhaka Principles for Migration with Dignity](#) and [Migration with Dignity: A Guide to Implementing the Dhaka Principles](#).

Governments and regulators are increasing efforts to improve policies and address gaps, including combatting recruiters and employers using unfair and nontransparent practices.

- Explore more: International Organization for Migration (IOM) [The Montreal Recommendations on Recruitment: A Roadmap towards Better Regulation](#).

ILO guidance stipulates that no recruitment fees or related costs should be borne by workers or jobseekers (although some exemptions exist). The “Employer Pays” model also requires that all costs of recruitment are met by the employer.

- Explore more:
 - ILO [General principles and operational guidelines for fair recruitment and Definition of recruitment fees and related costs](#).
 - IHRB [Ethical Recruitment: Translating Policy into Practice](#).
Issara Institute: [Slavery Free Recruitment Systems](#).

For a company to ensure migration with dignity and follow fair recruitment and employment practices, no worker should pay a fee to secure a job, workers should be recruited through legal and ethical processes, and the hiring process must include worker safeguards and transparency.

- Explore more:
 - [Responsible Recruitment Tool: Eliminating Recruitment and Employment Fees – Guide for retailers, brands, employers, labour providers](#).
 - Impactt: [Ethical Recruitment: Translating Policy into Practice](#).
 - Issara Institute: [Slavery Free Recruitment Systems](#).





WHY RESPONSIBLE RECRUITMENT MATTERS

The seafood industry relies on many workers to produce, harvest, and process fish and other seafood products. However, taking on a new job—especially if a worker must migrate between countries for that job—is often risky. Even before a worker steps foot in a processing facility or arrives at a vessel, they may accrue debts that make them vulnerable to coercion, exploitation, debt bondage, and threats.

According to the [ILO Fair Recruitment Initiative](#), workers may encounter one or more of the following abuses in the recruitment process:

- Deception about the nature and conditions of work.
- Retention of passports.
- Illegal wage deductions.
- Debt bondage linked to repayment of recruitment fees.
- Threats if they express a desire to leave their employers, coupled with threats of subsequent expulsion from a country.

MIGRANT WORKER RECRUITMENT FEES

- THE INCREASING DEBT BURDEN

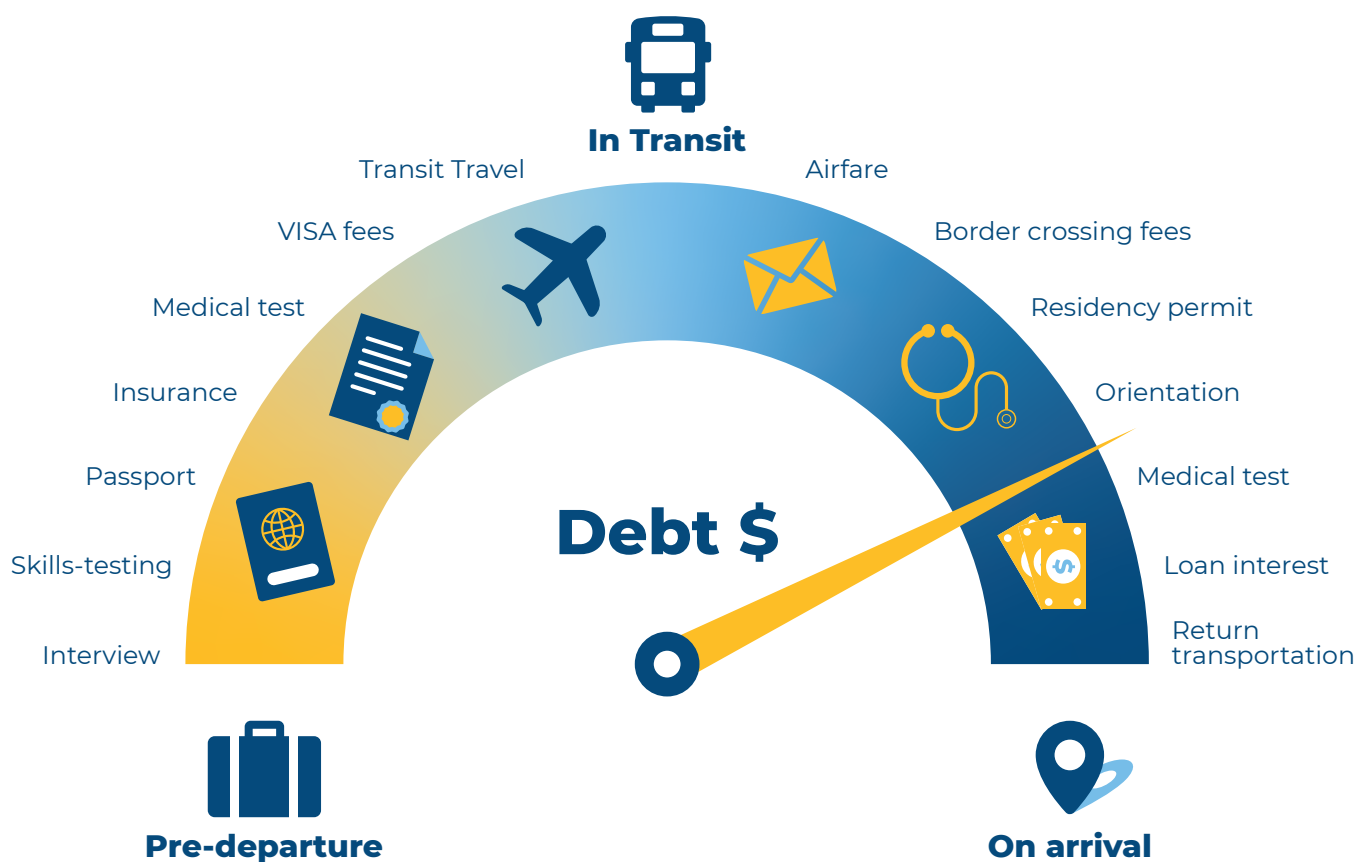


Image Credit and Citation: Institute for Human Rights and Business, "Responsible Recruitment: Remediating Worker-Paid Recruitment Fees" (November 2017) Available at: <https://www.ihrb.org/focus-areas/migrant-workers/remediating-worker-paid-recruitment-fees>

For some seafood supply chains, including fishing vessels on the high seas, work occurs under multiple jurisdictions and exploitation during the migration process [is well documented](#). The worker, captain, vessel owner, vessel flag, fishing operations, and ports visited may represent different countries. The many [potential jurisdictions may make it challenging to assess risk accurately, map national recruitment laws, and enforce legal practices](#).

Despite these challenges, the UN's [Guiding Principles on Business and Human Rights](#) establishes the responsibility of businesses to respect internationally recognized human rights within their operations and supply chains, including during the recruitment process. Companies need to address recruitment-related risk as it is an essential component to reducing business risks, strengthening company resilience, and building a brand of social responsibility.

Human rights and labour abuse during the recruitment process may be associated with the following different types of risks for companies:

- Legal
- Reputational and brand value
- Resilience/stability of supply chain
- Barriers to trade
- Eligibility for investment funding
- Threats to participation in collaborations or public-sector funding streams

Evaluating and improving the recruitment process is crucial to address and mitigate the risk of forced labour, debt bondage, and human trafficking. When workers are required to pay for recruitment-related fees and costs, as well as pay brokers or others for access, bribes, or other undisclosed fees, they take on an increasingly high debt burden that may bind them to their employers and increase their vulnerability to exploitation.

READY TO TAKE ACTION?

“Prospective employers, public or private, or their intermediaries, and not the workers, should bear the cost of recruitment.”

- ILO General Principles and Operational Guidelines for Fair Recruitment

Commit:

A public commitment to responsible recruitment signals corporate investment in the topic and encourages transparency and accountability toward meeting ambitious goals.

- Commit to implementing responsible recruitment practices, including:
 - [Employer Pays Principles](#).
 - Disclosure to workers of all fees and related costs prior to accepting the job.
 - Reimbursement of recruitment fees and related costs previously paid by workers.
 - Remediation of recruitment-related issues.
- [Inform suppliers of recruitment-related commitments](#) through expectations letters or other communications.

Learn:

Companies may not have expertise in global recruitment and its contribution to forced labour. Investing in knowledge and resources, particularly [ILO principles and guidance](#), will help meet responsible recruitment goals.

- Understand [policies](#) and [practices](#) that contribute to unethical recruitment, including the [recruitment fees and related costs charged to workers](#).
- Train employees on [Employer Pays Principles](#), recruitment risks, and [ILO General Principles and Guidelines for Fair Recruitment](#).

Assess:

Companies that map recruitment channels and gather data regarding their supply chains' recruitment processes have more visibility and capability to address human rights risks.

- Assess recruitment-related risks in supply chains, such as fees and related costs, labour protections in countries of employment, and the prevalence of migrant and other potentially vulnerable workers (e.g., women, seasonal workers) in the workforce.
- Map labour recruitment in supply chains.

- Evaluate [recruitment practices throughout your company's supply chains](#), as verified by workers themselves.

Build Capacity:

Investing in improvements that benefit workers will build a stronger social responsibility program and may help reduce turnover and increase job satisfaction.

- Ensure grievance mechanisms are inclusive of issues that occurred during the recruitment process.
- Invest in [pilots or research](#) regarding recruitment practices in your company's supply chains or regions of focus.

Collaborate:

Recruitment is a cross-sectoral and global issue but has unique regional contexts. To make lasting improvements, companies must collaborate with other private sector partners and rely on the expertise of local stakeholders.

- Encourage peers and other companies to support the [Employer Pays Principles](#), including through [joining collaboratives](#) such as the [Leadership Group for Responsible Recruitment](#).
- Advocate for strengthened protections during the migration process, especially in countries that send or receive large numbers of international workers.
- [<Collaborate>](#) with [workers and civil society organizations](#), including worker groups and trade unions, to identify specific needs and improvements in key regions or sectors.
 - Prioritize organizations that are familiar with the local context, language, and have already established trust with the community.

Remediate:

Recruitment fees contribute to debt bondage, a practice that leads to forced labour. Reimbursement of recruitment fees is an important way to improve the lives of workers.

- Establish and implement processes to [identify and document recruitment fees and related costs paid by workers](#).
- [Reimburse recruitment fees and related costs paid by workers](#), and [incorporate the costs for reimbursement into payments to suppliers](#) and other companies in the supply chain.
 - Ensure payments are received by workers. Pay salaries through a bank account supplemented with a written or electronic

payslip to facilitate transparency and monitoring.

- o Confirm that workers are the owners of and have full, unhindered access to the bank accounts listed.
- Establish mechanisms and safeguards to eliminate worker-paid recruitment and other illegal fees.
 - o Document steps taken to prevent future fees and related costs from being incurred by workers, including partnering with trusted recruitment agencies that implement ILO guidelines or moving recruitment efforts in-house.

Iterate:

Remedy first and over time improve systems to achieve responsible recruitment.

- Work to achieve the following practices:
 - o Workers do not pay recruitment fees or related costs, and the ILO's general principles for fair recruitment are met.

Communicate:

Communicating responsible recruitment efforts provides accountability to stakeholders and demonstrates leadership and understanding.

- Communicate publicly regarding specific initiatives undertaken by the company to support Employer Pays Principles and other responsible recruitment practices, including the reimbursement of recruitment and related fees.

WANT TO LEARN MORE?

- Issara Institute: [Worker Voice-Driven Ethical Recruitment - Streamlining and professionalizing employer-pays recruitment.](#)
- Leadership Group for Responsible Recruitment: [Catalysing Business Leadership Theory of Change.](#)
- Verité and ManpowerGroup: [An Ethical Framework for Cross-Border Recruitment: An Industry/Stakeholder Collaboration to Reduce the Risks of Forced Labour and Human Trafficking.](#)
- [Resources for Responsible Recruitment](#), a Verité Initiative.
- Mekon Club: [Migrant Labour Recruitment 1 and 2](#)
- Stronger 2gether: [Practical Guide to Responsible Recruitment During and Coming out of COVID-19.](#)
- Verité:
 - o [An Ethical Framework for Cross-Border Recruitment.](#)
 - o [Monitoring the Performance of Labour Recruiters and Employers in the Seafood Supply Chain.](#)
 - o [Sample Benchmarks of Good Practice in Recruitment and Employment for Seafood Supply Chains.](#)

WORKER ENGAGEMENT

*When workers
participate and
engage, business
operations improve*



WHAT IS WORKER ENGAGEMENT?

Workers should have various means of engaging with their employers to make improvements to working conditions. Freedom of association and collective bargaining are fundamental worker rights that help workers to do so, and these also create the conditions for the protection of other core labour rights.

- ILO: [Freedom of Association in Practice: Lessons Learned](#)

However, the right to freedom of association and collective bargaining is legally limited or underutilized in some regions and sectors such as high seas fishing. In these instances, companies can implement a range of activities—termed “worker engagement”—that enable workers to interact with employers regarding workplace culture, working conditions, and other issues. Methods of engagement may include grievance mechanisms, worker management meetings, committees, and trade unions.

- Explore more: [RISE: Worker Voice Continuum](#).

At minimum, companies must implement effective grievance mechanisms. Workers should face no reprisal due to submitting grievances and, to be effective, companies must have transparent procedures in place to receive and examine these grievances.

- Explore more:
 - ILO: [Grievance handling](#).
 - Global Compact Network Netherlands, Oxfam and Shift: [Remediation and grievance mechanisms](#) ‘Early warning, effective solutions’.

Regardless of the type(s) of worker engagement used by the company, success depends on worker uptake. Although resolving and remediating grievances can be challenging, management should welcome dialogue with workers and view it as crucial to the company’s continued growth. If no workers raise issues, reevaluate the effectiveness of the procedure and consider providing additional labour and human rights resources and training. Workers may not know how to access the grievance mechanism, or they may need more guidance in order to participate and engage meaningfully.

- Explore more:
 - [What Makes a Grievance Mechanism Effective?](#) and [Evaluating the Effectiveness of Grievance Mechanisms](#)
 - [Online Worker Training Center: China](#)
 - [Worker Voice on Fishing Vessels](#)

Successful worker engagement opens up a dialogue between workers and management to improve working conditions and creates avenues for workers to identify other issues. It may even lead the company to adapt its governance approach to increase worker participation.

- Explore more:
 - [RISE Workplace Governance](#)
 - ILO: [Guidance on setting up a protocol for relations between management and workers](#)





WHY WORKER ENGAGEMENT MATTERS

The United Nations [Guiding Principles on Business and Human Rights](#) establish that companies have the responsibility to enable, establish, and uphold [core labour standards](#), independent of whether a country's laws fulfill its human rights obligations. Indeed, company-led worker engagement is especially powerful in supply chains where workers have little or no access to protections or judicial remedies.

Worker engagement benefits companies by strengthening operations, enhancing knowledge of supply chain issues, providing data to verify working conditions, and increasing confidence that standards and rights are upheld.



Global Guidance and Treaties Regarding Worker Engagement

UN Guiding Principles on Access to Remedy

Foundational Principles:

Company: Business enterprises should respect human rights. This means that they should avoid infringing upon the human rights of others and should address adverse human rights impacts with which they are involved.

- To make it possible for grievances to be addressed early and remediated directly, business enterprises should establish or participate in effective operational-level grievance mechanisms for individuals and communities who may be adversely impacted.
- Industry, multi-stakeholder, and other collaborative initiatives that are based on respect for human rights-related standards should ensure that effective grievance mechanisms are available.

Country: As part of their duty to protect against business-related human rights abuse, States must take appropriate steps to ensure—through judicial, administrative, legislative, or other appropriate means—that, when such abuses occur within their territory and/or jurisdiction, those affected have access to effective remedy.

Resource: Shift: [Putting the UNGPs into Practice](#)

Relevant ILO Conventions

- **No. 87*** – The Freedom of Association and Protection of the Right to Organise Convention
- **No. 98*** – Right to Organise and Collective Bargaining Convention
- **No. 135** – Protection and Facilities to be Afforded to Workers' Representatives in the Undertaking Convention
- **No. 143** – Recommendation on Workers' Representatives
- **No. 163** – Collective Bargaining Recommendation
- **No. 94** – Consultation and Cooperation between Employers and Workers at the Level of Undertaking Recommendation
- **No. 129** – Communications between Management and Workers within the Undertaking Recommendation
- **No. 188** – Work in Fishing Convention

** Denotes an ILO core convention, considered a fundamental principle and right at work*

Resource: ETI: [Freedom of association & collective bargaining implementation roadmap](#)

Fishing, especially in international waters, is in particular need of worker engagement mechanisms. Workers on commercial fishing vessels, especially migrant workers, are [vulnerable to exploitation and abuse due to the combination of limited oversight, discriminatory laws, and lax enforcement](#). However, workers on vessels are hampered by their isolation. This limits their ability to communicate with personal networks or advocacy organizations for support. Additionally, unionization rates for at-sea workers are relatively low. Sectors like fisheries—in which the work occurs in remote locations with sporadic or infrequent access to communications—are more difficult to organize.

Even more so than others, workers with minimal access to communication methods need to be provided the ability to share input and grievances about workplace conditions, with the confidence that safeguards exist to protect them from recrimination or reprisal. There are many interrelated ways that companies may engage workers. It is imperative to involve them in workplace initiatives and social responsibility programs, despite instances where communication tools, rights to freedom of association, and access to collective bargaining are limited or underutilized.

READY TO TAKE ACTION?

“By strengthening worker voice and representation, management is... investing in staff retention, boosting workplace morale, and improving productivity while preventing crises that could harm their company’s reputation and earnings.”

- Art Prapha, Oxfam

Commit:

- Commit to implementing effective grievance mechanisms.
- Commit to upholding [ILO core labour rights](#), including the ability of workers to collectively bargain and freely associate.
 - If the right to free association is legally limited for all or some workers (e.g., migrants), commit to other forms of worker engagement, such as worker committees.
- Align commitments throughout the supply chain to achieve the long-term sustainability of worker engagement.
 - Incorporate commitments to effective grievance and worker engagement in supplier expectations.

Learn:

- Train staff and supply chain partners on core labour rights—including the right to collective bargaining and freedom of association—and the importance of access to effective grievance mechanisms.
 - Share the [business benefits of worker engagement](#), such as staff retention, increased morale, and improved productivity.
- Ensure that workers have access to information on their rights and conditions of employment from recruitment to employment.
- Empower workers with training and resources to enable meaningful participation in monitoring labour conditions and engaging in improvement processes once on the job.

Assess:

Direct worker engagement provides companies with the most accurate information of conditions and worker experience. However, collecting data about and from workers requires particular

[safeguards to ensure protection from retaliation, recrimination, and reprisal.](#)

- Collect data on issues raised by workers in the risk assessment, and use this information when identifying [salient issues](#).
 - Companies that collect data from workers must also be prepared to verify and [remedy](#) reported instances that violate company policy.
- If issues are not raised through grievance processes and worker engagement, utilize publicly available information from civil society or worker-support organizations to determine whether risks are actually absent or the grievance and worker engagement mechanisms are ineffective.

Build Capacity:

- At minimum, ensure [effective grievance mechanisms](#) in your company’s supply chains.
- Share information about the resolution of grievances and corrective action plans regarding grievances with workers to build trust and encourage engagement.
 - Invest in establishing or scaling effective grievance mechanisms.
- Consider shared grievance mechanisms with other companies, including pooling funds to reimburse workers or provide other forms of remedy.
- Proactively remove barriers to [freedom of association](#) and [collective bargaining](#) in your company’s operations.
 - Provide suitable mechanisms for ideas and concerns to be communicated from workers to management.
 - [To the fullest extent allowed by law](#), there should be no negative repercussions for organizing.
 - Grant trade unions representing workers access to the workplace as appropriate.

Collaborate:

- Advocate for all seafood workers’ right to collectively bargain and freely associate, regardless of immigration status.
- Support the legal right of workers and civil society organizations to report on and make claims of workplace abuse without fear of retribution.
- Establish dialogue and build trust with trade unions, workers networks, and local communities.

Remediate:

- Remediate issues raised through worker engagement, including but not limited to formal grievance mechanisms, worker hotlines, and any issues raised by trade unions, committees, or other workers' associations by following the guidance outlined in [RISE Remediate](#).
 - Workers or their representatives should participate in verification of remedy.

Iterate:

- [Work to achieve](#) the following practices:
 - Recognize the rights to freedom of association and collective bargaining.
 - Engage in ongoing, meaningful consultation and communication with workers, worker representatives, and governments.
 - Establish procedures to collect, investigate, and resolve grievances within the seafood supply chain.
 - Participate in procedures to settle industrial disputes where relevant.
- For further guidance, see ILO: [Q&As on business and collective bargaining](#).

Communicate:

- Report the number and type of grievances raised, including how grievances were identified, resolved, or other outcomes.
- Report the conditions outlined in any current collective bargaining agreements, the number of worker committee meetings conducted, and other ways that the company is engaging workers.
- Share the [benefits of freedom of association and collective bargaining](#) for reducing labour and human rights abuse.

WANT TO LEARN MORE?

ILO:

- [Practical Guide: Managing Industrial Relations in the Workplace](#)
- [Freedom of Association in Practice: Lessons Learned](#)
- [Q&As on Business and Freedom of Association](#)
- Open Society Foundations: [Transformative Technology for Migrant Workers](#)
- ETI: [Freedom of association & collective bargaining implementation roadmap](#)
- Issara Institute: [What is Worker Voice in the Context of Global Supply Chains?](#)



DECENT WORK AT SEA

*People deserve strong
protections whether
they work on land or at
sea*

WHAT IS DECENT WORK AT SEA?

The decent work agenda is about safeguarding fundamental human and labour rights, offering equality of opportunity and treatment to workers, delivering a fair income with security and social protection, including worker voices in workplace decision making, and allowing for the potential of personal development and recognition. Decent work is central to reducing poverty and is a path to achieving equitable, inclusive, and sustainable development, underpinning peace and security in communities and societies.

Sectors like seafood—where workers often take great pride in or have a personal connection to the work—offer ample opportunity to further foster this pride through advancing human and labour protections. If fishers have the safeguards they need, and ocean resources are preserved, decent work and livelihoods in fishing can be protected for future generations.

Working at sea is a unique context. Fishers follow [highly migratory species](#) for long distances, often across multiple jurisdictions, all while facing the hazardous conditions of the open ocean and limited access to port resources. Many fishing vessels operate on the high seas, beyond national jurisdictions and with little oversight. This can create barriers to decent work and allow illicit conditions, such as those outlined below, to occur with impunity.

- Forced labour, [hazardous child labour](#), abuse, and discrimination against workers.
- Worthless or non-existent employment contracts, fake certificates, and [worker blacklisting](#).
- Low pay and systematic cheating—by vessel owners and their agents—of the fishers' wages.
- Inconsistent flag and port state [implementation and enforcement](#) of regulations or [protections against abuse](#).
- Fatigue associated with long or unpredictable hours.
- Isolation on vessels for lengthy periods of time without the ability to go to port or contact family, worker representatives, authorities.
- [Unsafe or unsanitary practices, dangerous work environments, and substandard vessels](#).
- Inadequate food and unsanitary and precarious living conditions.
- Insufficient ability to connect with human rights or civil society organizations and legal authorities as needed.
- Inadequate collective bargaining activities, freedom of association, and worker representation.



Four Pillars of Fishing Vessel Safety

Inter-governmental agencies have identified key elements that support safe, decent work in fishing. To improve decent work for fishers, the ILO advocates implementing the [Work in Fishing Convention \(ILO C188\)](#). To strengthen global requirements for vessel oversight, especially related to improving fisher safety, the ILO, International Maritime Organization (IMO), and Food and Agriculture Organization (FAO)

have [identified four global agreements and conventions](#). These “four pillars” are intended to work together as the backbone for reducing illegal activity, increasing environmental protections, and promoting fisher safety and welfare on the international stage. To support increased safety and transparency, all four agreements should reach global ratification.

THE FOUR PILLARS

I.

[ILO Work in Fishing Convention No. 188 \(Work in Fishing Convention or ILO 188\)](#):

Sets the basic standards of decent work in the fishing industry and provides adequate protection for all of the people who work in this sector.

II.

[FAO Agreement on Port State Measures to Prevent, Deter, and Eliminate Illegal, Unreported, and Unregulated Fishing \(Port State Measures Agreement or PSMA\)](#):

Prevents, deters, and eliminates IUU fishing by preventing vessels engaged in IUU fishing from using ports and landing their catches.

III.

[IMO Cape Town Agreement](#): Outlines fishing vessel standards and other regulations designed to protect the safety of crews and observers.

IV.

[IMO Convention on Standards of Training, Certification, and Watchkeeping for Fishing Vessel Personnel \(STCW-F\)](#):

Sets certification and minimum training requirements for crews of seagoing fishing vessels to promote the safety of life at sea and the protection of the marine environment.

Learn more about the [four pillars for fishing vessel safety](#).

In addition to regulatory frameworks, the private sector has a significant role in improving vessel safety standards and working conditions. Achieving decent work at sea requires commitment and coordination among stakeholders to overcome challenges

and collaborate on crucial issues. After all, sustainability is not complete without decent working conditions, as summarized in the [UN Sustainable Development Goal No. 8 Decent Work and Economic Growth](#).



ENSURING DECENT WORK FOR FISHERS

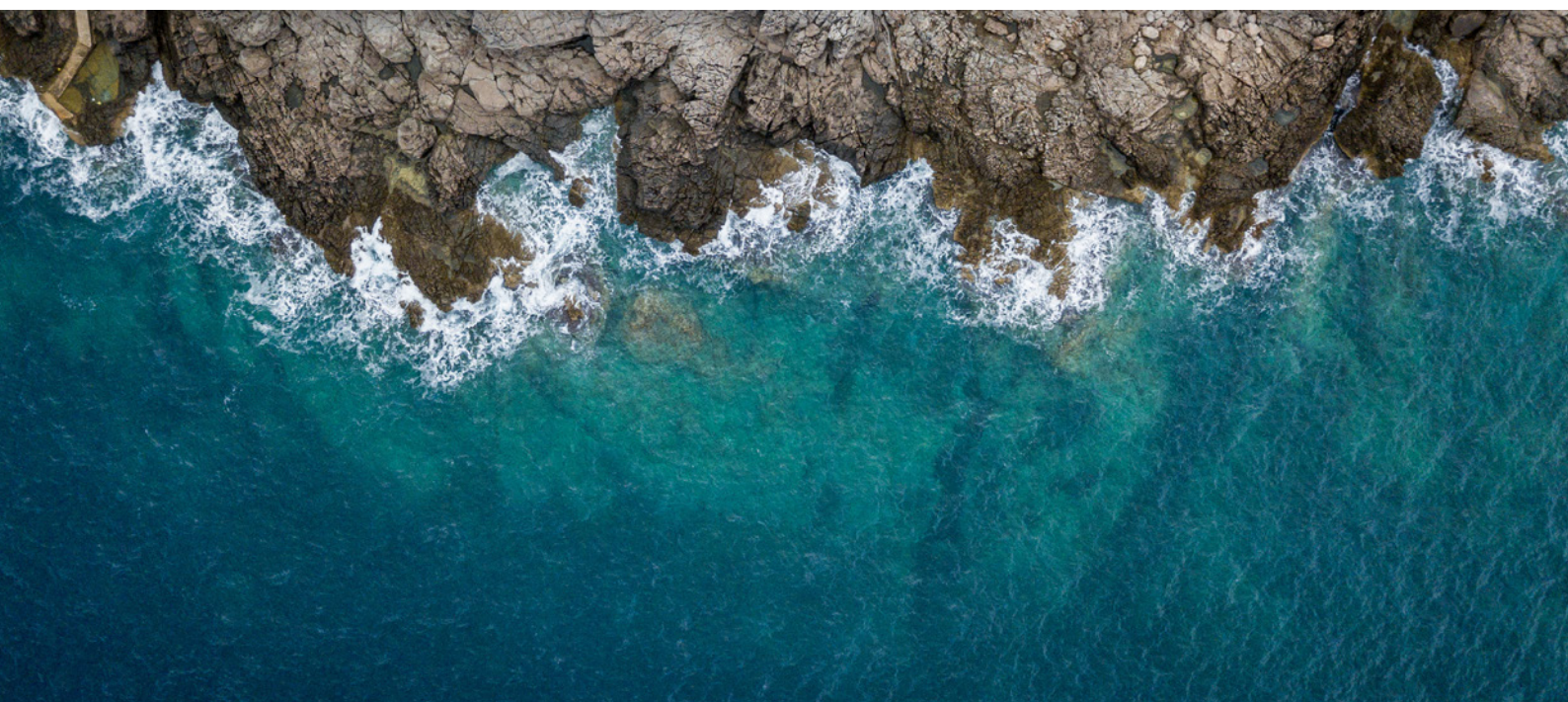
ILO'S WORK IN FISHING CONVENTION, 2007
(No. 188)

WHY DECENT WORK AT SEA MATTERS

Decent work means dignity, equality, fair income, and safe working conditions. However, at-sea workers face particular challenges to achieving these conditions and therefore require increased protections.

Sixty million workers engage in fishing or seafood operations globally, with over 15 million working full-time onboard fishing vessels. Fishing, particularly distant water fishing, is one of the most challenging and dangerous occupations in the world. Fishers deal with long hours, dangerous weather, slick surfaces, tight quarters, heavy machinery, and limited access to medical facilities and emergency support. Unfortunately, there are significant

gaps in protections for fishery workers. At the regulatory level, many maritime safety standards that protect other workers at sea—such as the [International Convention for the Safety of Life at Sea](#)—exclude fishing vessels, further contributing to the vulnerability of fishers at sea. At the fishery level, some workers encountering dangerous conditions may be fishing for feed that is used to produce aquaculture or animal products. Traceability to the feed is difficult even for companies that are informed of the challenge. Many companies remain unaware of the human rights risks, including forced overtime, low wages, threats, intimidation, and physical violence, among others, associated with 'trash fish' used for feed.



The Global Footprint of Industrial Fishing

Illuminating the spatial and temporal extent of global fishing, using satellites and algorithms to analyse vessel positions broadcast via automatic identification system (AIS) signals

DISTANCE COVERED BY VESSELS

460 million km / year
= **600 trips** to the moon and back

HOURS OF FISHING ACTIVITY

40 million hours / year

AIS MESSAGES PROCESSED

22 billion

HIGH SEAS FISHING BY COUNTRY

85% of total accounted for by China, Spain, Taiwan, Japan, & South Korea

FISHING VESSELS TRACKED

>70,000
including >75% of all vessels >34m

INDUSTRIAL FISHING IN

>55% of the ocean
= **4x** agriculture area

FISHING EFFORT FOOTPRINT

>100x
higher resolution than previous datasets

ENERGY CONSUMED BY VESSELS

20 billion kilowatt hours / year



Source: Tracking the global footprint of fisheries* Kroodma et al. 2018

Image Credit and Citation: Global Fishing Watch. 2021. Accessed on April 29, 2021.
<https://globalfishingwatch.org/research/global-footprint-of-fisheries/>

Important considerations and challenges to achieving decent work at sea include the following:

- Vessel conditions and safety at sea, including vessel characteristics (e.g., age, condition, maintenance), crew safety and training, and fishery regulations.
- Recruitment and fair employment, because identifying relevant national laws is challenging if different countries represent

vessel flag, vessel ownership, fishing region, port of departure, and port of return.

- Grievance, worker engagement, and remediation for work at sea.
- Established work hours and time of day, as fishing conditions may be unpredictable and operations are labour intensive.
- Repatriation, especially for workers on vessels fishing internationally.
- Data collection and verification for opaque and complex at-sea supply chains.

READY TO TAKE ACTION?

“Nearly four fishers lose their lives every hour while doing their job. The number of fishers injured or suffering from work-related illnesses are even higher. These fatalities and accidents have major impacts on fishers’ families, fishing crews, [and] fishing communities.”

—FAO, ILO, IMO, [Joining forces to shape the fishery sector of tomorrow](#)

Commit:

- Align company commitments to international guidelines for improving safety and work at sea, including the:
 - ILO: [Work in Fishing Convention C188](#).
 - Food and Agriculture Organization: [Port State Measures Agreement](#).
 - International Maritime Organization (IMO): [Cape Town Agreement](#).
 - IMO: [Standards for Training, Certification, and Watchkeeping for Fishing Vessel Personnel](#).

Learn:

- Learn about unique challenges to achieving decent work at sea, including the [hazards of fishing](#), the potential for [long periods at sea](#), and the challenges of [at-sea communications](#).
- Dedicate additional resources to improvements for at-sea operations.

Assess:

- Flag high-risk seafood supply chains in assessments, including fishing on vessels in international waters (e.g., tuna) that may be under-monitored and seafood that uses ‘trash fish’ for feed.
- Encourage vessels in your company’s supply chain to participate in public [vessel lists](#) and, to the extent possible, share vessel information with buyers.
- If vessel information is available, utilize vessel transparency platforms such as [Global Fishing Watch](#) to review vessel-level risks.

Build Capacity:

- Ensure vessel workers receive training on safety, working conditions, rights at sea, payment, and other relevant information prior to departure.
 - Participate in initiatives to train vessel

workers and owners, such as those provided by the [International Maritime Organization](#) or [International Labour Organization](#), as well as industry-focused collaborations like the [Seafood Task Force](#) and [International Seafood Sustainability Foundation](#).

- Invest in pilot projects and field-test new technologies on vessels, especially for the following high-priority topics:
 - Worker connectivity and effective grievance mechanisms at sea.
 - Electronic monitoring technologies that can be used to [gather risk data and increase transparency](#).
- Support long-term improvements for at-sea work, including establishing and verifying safe living and working on vessels.
 - Consider the advancements that can be made to existing processes, such as [port interviews with workers](#).
- Work with civil society organizations to improve the ability of workers on DWF vessels to freely associate and participate in collective bargaining.
- Build traceability systems to begin at the vessel and feed segment of seafood supply chains.

Collaborate:

- Encourage flag and port states to ratify the four pillars of fishing vessel safety, if they have not already, and implement standards:
 - [ILO Work in Fishing Convention No. 188](#).
 - [FAO Port State Measures Agreement](#).
 - [IMO Cape Town Agreement](#) (See “Status of Treaties”).
 - [IMO Standards for Training, Certification, and Watchkeeping for Fishing Vessel Personnel](#) (See “Status of Treaties”).
- Support the development of implementation guidance on decent work or social responsibility at sea (e.g., [PAS 1550](#)).
- Encourage fisheries management bodies, including those with limited social mandates, to [set labour standards for crew](#) (even if voluntary).

Remediate:

- Provide channels for remediation for seafood workers who may return from at-sea trips to different countries than those in which the vessel or employer is located.
- [Reimburse or bear the costs](#) of worker

repatriation.

- o Commit to repatriating workers at the end of their tenure with the company, facility, farm, or vessel, so they do not face risks of stranding in remote regions or with limited legal protections.
 - ◇ Establish and implement processes to repatriate workers upon the termination of their contracts, regardless of which party initiates the termination.
 - ◇ Do not leave workers in a country where they do not have the appropriate legal documents or protections.
 - ◇ Consider bearing or repaying the costs of repatriation in certain instances that are still fair to workers (e.g., the worker has legal protections in the travel countries, a fair agreement of this nature was stipulated in the contract, etc.).
- o Document the steps taken to prevent future workers from incurring repatriation fees or being stranded.

Iterate:

Work to achieve the following practice:

- o At-sea segments of company supply chains meet or exceed the standards outlined in [ILO Convention No. 188, the Work in Fishing Convention](#).

Communicate:

Communicate about challenges and accomplishments specific to sourcing from fishing vessels.

WANT TO LEARN MORE?

- [NGO Tuna Forum: At-Sea Transshipment Best Practices](#).
- [EJF](#):
 - o [Out of the Shadows – Improving Transparency to Combat IUU Fishing](#).
 - o [Ten Principles for Global Transparency](#).
- [FishWise: Open Water: Guidance on Vessel Transparency for Seafood Companies](#)
- [Greenpeace International Greenpeace Sustainability, Labour & Human Rights, and Chain of Custody Asks for Retailers, Brand Owners and Seafood Companies](#).
- [International Pole and Line Foundation: Fisheries Improvement Toolbox](#)
- [IUU Watch: Measures to increase transparency and fight IUU fishing in RFMOs \(EU audience\)](#).
- [Pew Charitable Trusts](#):
 - o [The Cape Town Agreement Explained: How one international treaty could combat illegal fishing and save lives](#).
 - o [New Tool Helps Evaluate Risk of Illegally-Caught Fish Passing Through Port: Pew interactive shows activity and patterns that could help authorities, seafood buyers, and others](#).
- [Ship to Shore Rights: Endline Research Findings on Fishers and Seafood Workers in Thailand](#)
- [Thai Union: Guidance to the Thai Union Fishing Vessel Improvement Program and Code of Conduct \(example of a company commitment and action plan\)](#)



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Created by FishWise with the support of the Walmart Foundation, RISE helps companies to navigate human and labor rights challenges and create the conditions for decent work across seafood supply chains.

RISE is built specifically for the seafood industry and addresses this industry's unique challenges and opportunities.

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