

SEA ALLIANCE

Update on the SEAA Risk Assessment

Friday 19th November 2021

SEAFOOD ETHICS
ACTION ALLIANCE



AGENDA

- Intro to working group
- Context, purpose and RA Scope
- Consulted groups
- Source of each metric
- Supply Chain context
- Next steps



WORKING GROUP

- Amber Madley NESI
- Clare Clifton World Wise Foods
- William Davies Hilton Seafoods UK
- Joe Prosho Morrison's
- Cate Hickey Coop



CONTEXT

- Conversations began back in **May 2020**
- Recognised the need for conducting a **shared, independent, baseline human rights risk assessment.**
- Intention was that the RA would:
 - Identify human rights risks based on fishery specific detail for UK companies
 - Provide a common reference for buyers to engage with suppliers around supply chain risk
 - Support the development of further enhanced due diligence in supply chains of highest risk
 - Provide a reference point for companies that have not undertaken their own assessments
 - Support assessments companies are already undertaking



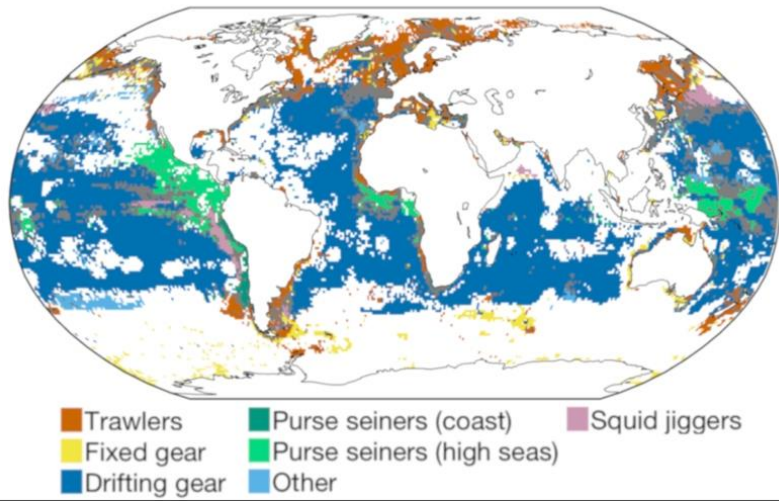
PROCESS



SEAA RA SCOPE

Fisheries	✓
Aquaculture	✗
Processing	✗
Evidence-based	✓
Indicators	✓
Decision tree	✗
Rating	✓





Species and Location	Production Methods	Certification or Improvement Project	Sustainability Ratings	Notes
 Alaska pollock <i>Theragra chalcogramma</i> E Bering Sea Fishery countries: U.S.	• Midwater trawl	Certified	FishSource Well Managed	✓
			Seafood Watch Eco-Certification Recommended	
			Good Fish Guide Best Choice 1	
			Ocean Wise Recommended	
			NOAA FSSI 4	

RA STRUCTURE



- Phase 1 – Define assessed unit at Fishery level
- Phase 2 – Country and fishery specific data from RA
- Phase 3 – Supply chain Context



RA DRAFT – SFP CONSULTANCY IN SEPT 2020

	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U
	Species group	Species	Latin Name	Production Area	Producing Country	Production Method	Gear code	1. Fishery governance and stock health	2. Flag of convenience	3. Country score in the IUU Fishing Index	4. Specific risk of abuse in fisheries	5. Global Slavery Index Fishing Risk	6. Ratification ILO C188	7. FNET Country risk rating	8. Gallup Migrant Acceptance Index	9. Migrant workers employed on vessels	10. Time at sea	Specific risks identified (see risk key)	AVERAGE RISK SCORE	
1																				
53	Salmon	Pink salmon	Oncorhynchus	Alaska	United States	Lift net	LN	0	10	5	5	5	5	5	10	ata-deficie	ata-deficie	N/A	4.50	
54	Salmon	Pink salmon	Oncorhynchus gorbuscha	Alaska	United States	Longlines	LTL	10	10	5	5	5	5	5	10	ata-deficie	ata-deficie	N/A	5.50	
55	Salmon	Pink salmon	Oncorhynchus gorbuscha	Russia	Russian Federation	Pots & traps	FIX	5	10	0	5	0	5	0	0	ata-deficie	ata-deficie	N/A	2.50	
56	Pollack	Pollack	Pollachius pollachius	Celtic Sea and West of Scotland	United Kingdom	Bottom trawls	TB	0	10	5	-10	5	10	5	10	ata-deficie	ata-deficie	HT, FL	3.50	
57	Pouting	Pouting	Trisopterus luscus	British waters	United Kingdom	Bottom trawls	TB	0	10	5	-10	5	10	5	10	ata-deficie	ata-deficie	HT, FL	3.50	
58	Pouting	Pouting	Trisopterus luscus	British waters	United Kingdom	Bottom trawls	TBB	0	10	5	-10	5	10	5	10	ata-deficie	ata-deficie	HT, FL	3.50	
59	Scallop	Queen scallop	Aequipecten opercularis	Irish Sea and W of Scotland	United Kingdom	Dredge	DRB	0	10	5	-10	5	10	5	10	ata-deficie	ata-deficie	HT, FL	3.50	
60	Crawfish	Red swamp crawfish	Procambarus clarkii	Chinese waters	China	Pots & traps	FIX	0	10	0	-10	0	5	0	5	ata-deficie	ata-deficie	FL	1.00	
61	Saithe	Saithe	Pollachius virens	Barents Sea	Norway	Bottom trawls	TB	5	10	5	5	0	10	10	10	ata-deficie	ata-deficie	N/A	5.50	
62	Saithe	Saithe	Pollachius virens	North Sea, Skagerrak, west of Scotland and the Rockall	United Kingdom	Bottom trawls	OTB	5	10	5	-10	5	10	5	10	ata-deficie	ata-deficie	HT, FL	4.00	
63	Saithe	Saithe	Pollachius virens	North Sea, Skagerrak, west of Scotland and the Rockall	United Kingdom	Bottom trawls	PTB	5	10	5	-10	5	10	5	10	ata-deficie	ata-deficie	HT, FL	4.00	
64	Hake	Shallow-water Cape hake	Merluccius capensis	South Africa	South Africa	Bottom trawls	OTB	10	10	5	-10	5	10	5	5	ata-deficie	ata-deficie	HT, FL	4.00	
65	Eel	Short-finned eel	Anguilla australis	New Zealand and SE Australia	New Zealand	Pots & traps	FYK	0	10	10	-10	10	5	10	10	ata-deficie	ata-deficie	FL	4.50	
66	Tuna	Skipjack tuna	Katsuwonus pelamis	Eastern Atlantic Ocean	Ghana	Pole & line/handline	LHP	5	10	10	-20	0	5	5	10	ata-deficie	ata-deficie	HT, FCL, FL, CL	2.50	
67	Tuna	Skipjack tuna	Katsuwonus pelamis	Eastern Atlantic Ocean	France	Pole & line/handline	LHP	5	10	5	5	0	10	5	10	ata-deficie	ata-deficie	N/A	5.00	



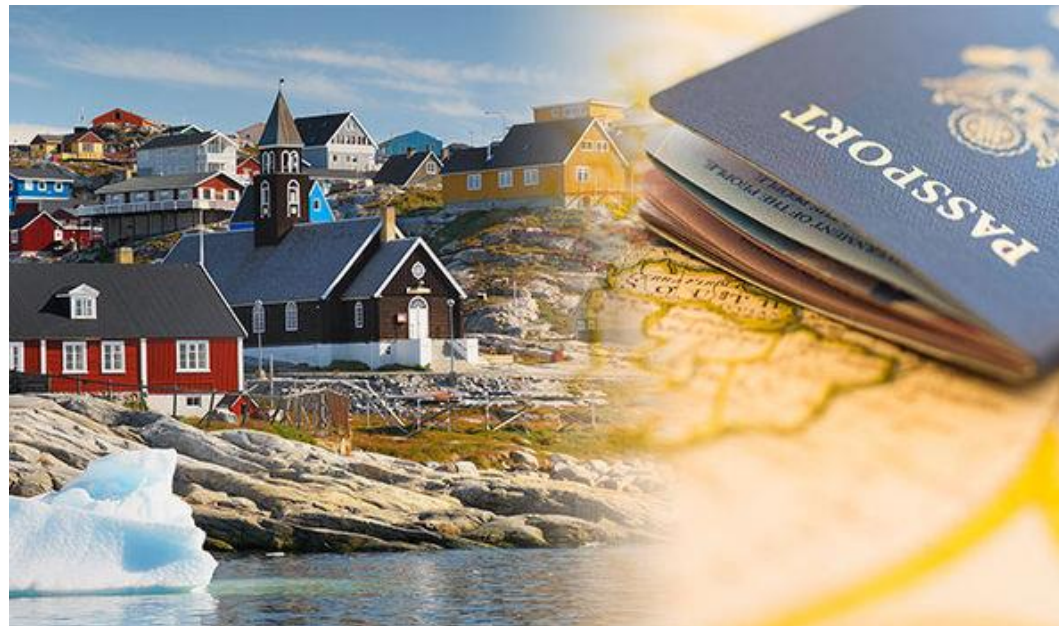
CONSULTED ORGANISATIONS



Stakeholder engagement:
As per TOR Risk assessment shared once
MOU signed
Semi-structured conversation with questions
shared with stakeholders on key areas



Data Deficient Messages



GALLUP POLL®

World Poll



	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R
	Species gr	Species	Latin Nam	Productio	Producing	Productio	Gear code	1. Fishery governan ce and stock health	2. Flag of convenience	3. Country score in the IUU Fishing Index	4. Specific risk of abuse in fisheries	5. Global Slavery Index Fishing Risk	6. Ratificati on ILO C188	7. FNET Country risk rating	8. Gallup Migrant Acceptance Index	9. Migrant workers employe d on vessels	10. Time at sea	Specific risks identifie d (see risk key)
1																		
2																		
3	Tuna	Albacore	Thunnus alalunga	South Atlantic	Saint Hele	Hook and LX		5	10	No score	5	No score	5	No score	No score	ata-deficie	ta-deficie	N/A
8	Lobster	American lobster	Homarus americanus	SW Nova Scotia	Canada	Pots & tra	FIX								No score	ata-deficie	ta-deficie	N/A
9	Scallop	American sea scallop	Placopecten magellanicus	Eastern Georges Bank	Canada	Dredge	DRB								No score	ata-deficie	ta-deficie	N/A
10	Cod	Atlantic cod	Gadus morhua	Barents Sea	Faroe Islands	Bottom trawls	TB	5	0	No score	5	No score	5	No score	No score	ata-deficie	ta-deficie	N/A
11	Cod	Atlantic cod	Gadus morhua	Barents Sea	Greenland	Bottom trawls	TB	5	10	No score	5	No score	5	No score	No score	ata-deficie	ta-deficie	N/A
12	Cod	Atlantic cod	Gadus morhua	Newfoundland	Canada	Bottom tr	TB	0	10	10	5	10	5	5	No score	ata-deficie	ta-deficie	N/A
13	Herring	Atlantic h	Clupea harengus	NE Atlantic spring spawners	Faroe Islands	Purse seine	PS								No score	ata-deficie	ta-deficie	N/A
			Clupea	NE	Faroe	Midwater	TM	0	0	No score	5	No score	5	No score		ata-deficie	ta-deficie	N/A



Proxy data for Data Deficiency

	<p>Some of the gaps have been filled by updates to our data sources</p> <p>Current gaps:</p> <ol style="list-style-type: none">1. No score in FNET country risk rating2. No score in IUU Fishing Index3. No score in Global Slavery index fishing risk4. No score in Gallup Migrant acceptance index <p>Rules on use of proxy data needs to be included in the intro to the tool</p>	<ol style="list-style-type: none">1. Where there is no FNET country risk rating the default score will be high risk as per FNET approach2. Where there is no IUU score in the Global Fishing Index (Minderoo Foundation), use IUU Fishing index, where still no score SFP fish source score 3 (compliance with managers decisions, assesses whether catch is over quote, or signed PSMA, EU carding procedure)3. Where there is no GSI fishing risk score – Use GSI country level score (vulnerability to modern slavery or estimated prevalence of modern slavery) where there is no country level score use score 4 – specific risk of abuse in fisheries4. Where there is no Gallup Migrant acceptance index score duplicate use of score 4 – specific risk of abuse in fisheries
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Workstream 4: Risk Assessment, mitigation and due diligence in Seafood supply chains

Outcome: SEA Alliance participating companies are using common data points to effectively identify and manage risks in fisheries they source from

Target: Dec 2022

Activity 1: The Risk Assessment tool is further developed and shared with relevant industry groups

Activity 2: SEA Alliance develop a common data set for fisheries/vessels

Activity 3: SEA Alliance develop toolbox of guidance to help companies manage human rights risks (+ HRDD guidelines)

- Expand number of fisheries
- Introduce proxy data to fill data deficiencies
- Increase external sources for known risks in public domain
- Improving weightings
- Share tool with industry groups
- Update at least annually

Workstream 4: Stakeholder feedback

I. Are the metrics correct?

- Additional/alternative sources to consider: what do we want to know, what do our metrics tell us?
 - Cape Town agreement
 - Global Corruption perception index
 - IUU risk tool (Standford)
 - Seafood Slavery Risk Tool (Seafood Watch)
 - Global Fishing index (Minderoo foundation)
 - International Bill of rights ratified (compliments ILO188 metric)
 - ILO forced labour indicators
 - ITUC Global Rights Index
 - Global Slavery Index
 - US State Department Trafficking Report
 - More specific Flag of Convenience metric (Paris/Tokyo MOU ratings)
 - Balance use of TIP report/"live" data – HRAS, ISSF, EIJ, in-country NGOs (ILRF, GLJ, Seafood Taskforce Thailand, Greenpeace). Avoid use of member company data – conflict of interest/competition law.

2. Use of weightings and ratings

- Should some metrics be rated higher than others – country & fishery metrics
- Fisheries with known incidents v fisheries with potential risk – flag these? Red rate?
- Proxy data is needed for country level metrics – for fishery level data give a neutral score (include data deficiency as a supply chain metric)
- Should gear type be weighted or too hard to get consensus?

Workstream 4: Stakeholder feedback

3. “Mitigating factors”

- Change to “supply chain context” – should be able to +/- risk
- Mark as default high risk to encourage completion
- Should be completed by individual companies, data not gathered by SEA Alliance
- Potential controversial areas – stick to accepted areas, provide the rest in guidance for consideration;
- Suggested factors to consider;
 - Time spent at Sea – definition needed (FAO)
 - Use of transshipment
 - HRDD completed (or compliance to FP social requirements for FIPS)
 - AIS (used by Global Fishing watch)
 - Public vessel register
 - Presence of migrant workers (yes/no – no scale)
 - Use of private standards (?)
 - Employment agreements/clear employment rights
 - Effective grievance mechanism
 - Transparent/open v avoidance of engagement
 - Data deficiency
 - Presence of observers
 - Traceability metric (e.g. GDST compliant)
 - Gear type

Workstream 4: Stakeholder feedback

4. Collaboration with industry groups

- GTA, FNET, SSC all keen to use the risk rating tool
- Expectations vary – annual v live updated tool, HRAS tool in public domain
- Needs to come with use guidance and definitions (E.g. migrant)
- Format – downloadable database, available to member access only
- Scope
 - GTA 27+ source countries
 - Interest in feed/aquaculture (e.g. tuna trash feed/tuna frames)
- Potential for funding from donors to complete/expand
- Collate remaining feedback
- SFP meeting – current v proposed metrics and weightings

1. Fishery Governance and Stock Health

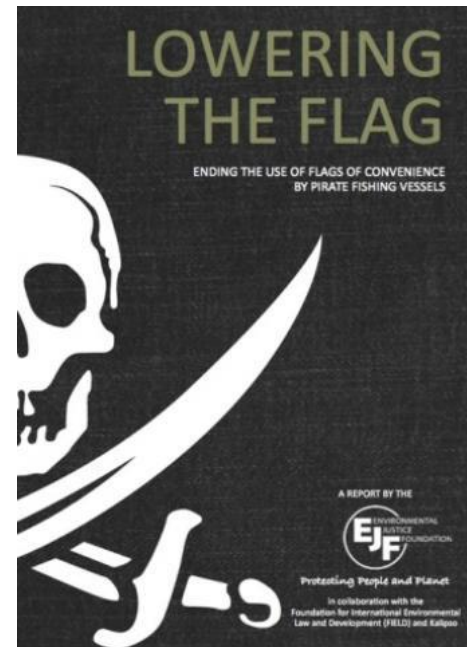
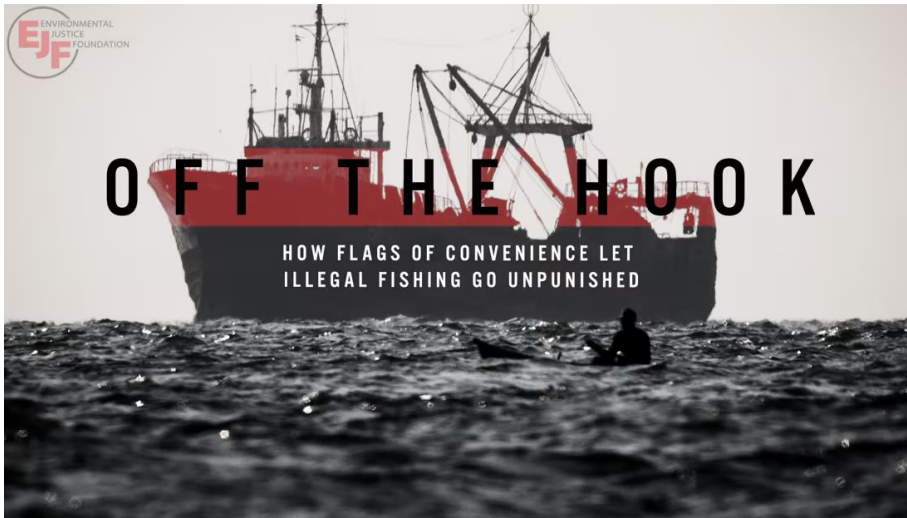
How FishSource Works

FishSource compiles and summarizes publicly available scientific and technical information about the status of fisheries, seafood stocks and aquaculture production industries into an easily interpretable form. It aims to make this information more accessible to seafood buyers and help them take actions to improve the sustainability of the seafood they purchase.

- ① Interplay of Information Levels
- ② Profile Structure
- ③ FishSource Scores
- ④ FishSource Content
- ⑤ Improvement Cycle

START EXPLORING

2. Flag of Convenience

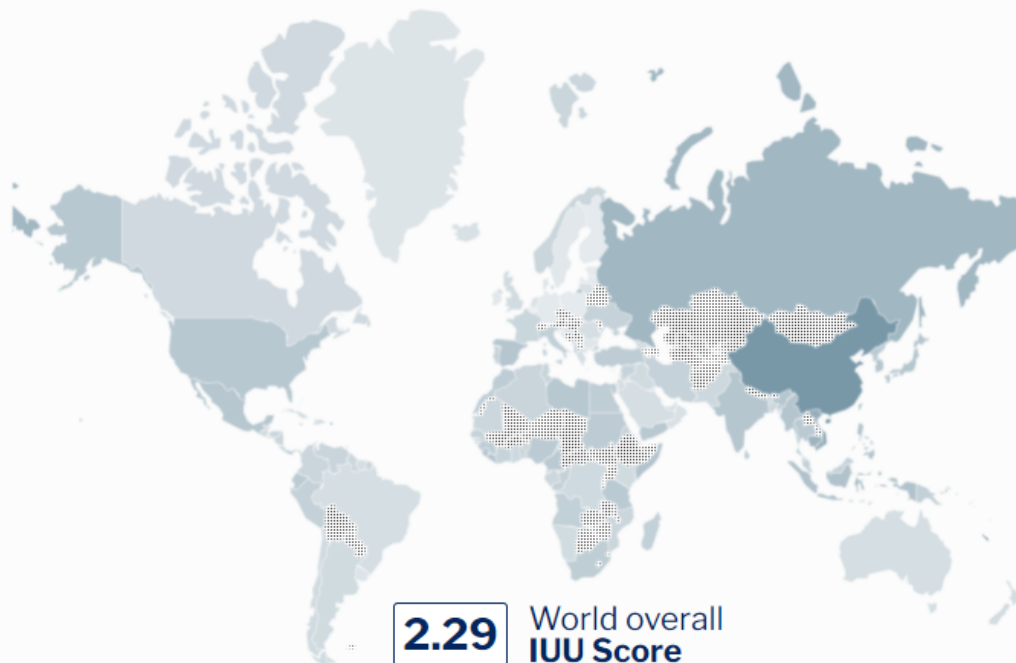


3. Country Score in the IUU Fishing Index

About the IUU Fishing Index

The Index provides a measure of the degree to which states are exposed to and effectively combat IUU fishing. The IUU Fishing Index provides an IUU fishing score for all coastal states of between 1 and 5 (1 being the best, and 5 the worst). The Index allows countries to be benchmarked against each other, and assessed for their vulnerability, prevalence and response to IUU fishing.

The Index has been developed by **Poseidon Aquatic Resource Management Ltd.**, a fisheries and aquaculture consultancy company working globally, and the **Global Initiative Against Transnational Organized Crime**, a Geneva-based NGO network of experts working on human rights, democracy, governance, and development issues where organized crime has become increasingly pertinent. Funding for the Index was provided by the Norwegian Ministry of Foreign Affairs.





Project

GLOBAL FISHING INDEX

An independent assessment of country-level progress towards achieving UN Sustainable Development Goal 14.4 to effectively regulate harvesting, end overfishing and restore fish stocks to sustainable levels.

[Flourishing Oceans Overview](#)

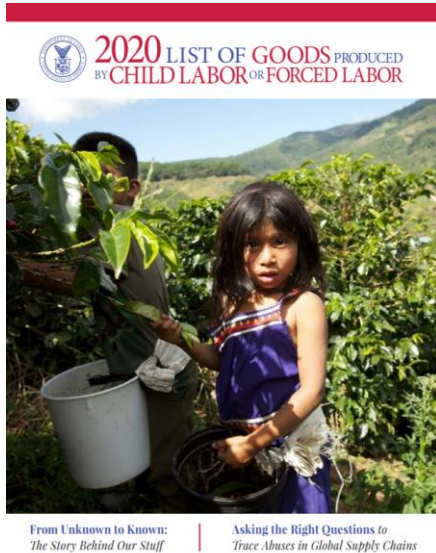
What is the Global Fishing Index?

The Global Fishing Index is a global study of the health of fish stocks and state of fisheries governance in maritime countries around the world.

The Global Fishing Index includes two components: an estimate of aggregate fish stock biomass on a country-by-country basis and an assessment of the capacity for fisheries governance for eliminating overfishing within a country's marine jurisdiction.

This index complements current efforts to track progress towards Sustainable Development Goal 14.4 by expanding the scope, resolution and availability of fisheries data at the national level. Understanding the state of fishery resources and the effect of governance at this level is the first step toward identifying bright spots, as well as critical areas for improvement at a national, regional and global scale.

4. Specific risk of abuse in fisheries



5. Global Slavery Index Fishing Risk



GLOBAL SLAVERY INDEX

Top 20 fishing countries categorised according to risk of modern slavery in their fishing industry¹⁸

● HIGH RISK

China
Japan
Russia
Spain
Korea, Republic of
(South Korea)
Taiwan
Thailand

● MEDIUM RISK

Chile
India
Indonesia
Malaysia
Mexico
Morocco
Peru
Philippines
Vietnam

● LOW RISK

Iceland
Denmark
Norway
United States

Country	National Fisheries Policy	Wealth and Institutional Capacity
Albania	●	●
Algeria	●	●
Angola	●	●
Argentina	●	●
Australia	●	●

6. ILO Ratification

International Labour Standards

Definition

Legal instruments drawn up by the ILO's constituents (governments, employers and workers) setting out basic principles and rights at work.

Source: ILO



7. FNET country risk rating



8. Migrant Acceptance Index

GALLUP POLL®
World Poll

The Countries Most & Least Accepting Of Migrants

Acceptance of migrants among the public
according to Gallup's Migrant Acceptance Index*

9. Migrant crew



Time spent at sea – RFVS categories



Final proposed
data/metrics:

Included in the tool	Source
Species group, species, Latin name	-
Production area, Producing country	-
Production methods, Gear code	-
1. Fishery Governance and stock health	Fishsource score, or GSSI recognised certification (to be added manually)
2. Flag of convenience	ITF
3. Country score in IUU Fishing Index – replace with Mindheroo	
4. Specific risk of abuse in fisheries – weighted?	TIP report, Worst forms of child labour report, list of good produced by child labour or forced labour 2020, country report on human rights practices 2019, EJF, HRAS
5. Global Slavery Index Fishing risk	National Fisheries policy + Wealth and institutional capacity metrics
6. Ratification of ILOC188 – replace with Minderoo	
7. FNET Country risk rating	FNET country risk rating
8. Gallup Migrant Acceptance Index	Gallup Migrant Acceptance Index
9. Migrant workers employed on vessels	Y/N – No = reduces risk?
10. Time spent at sea	Add times – which +/- risk

Supply Chain context



RA STRUCTURE



- Phase 1 – Define assessed unit at Fishery level
- Phase 2 – Country and fishery specific data from RA
- Phase 3 – Supply chain Context

Indicator / Topic	Choices	Answer	Is this indicator / topic weighted?	Rationale
Time at Sea	<ul style="list-style-type: none"> • Single-person operated vessels exclusively worked by an owner • Crewed vessel at sea for less than 24 hours • Crewed vessels at sea for 24-71 hours • Crewed vessels at sea for 72 hours up to 30 days • Crewed vessels at sea for 30 days 	<ul style="list-style-type: none"> • Low • Low - Medium • Medium • High • Super High 	Yes	
Transshipment		Yes / No	<i>No – because this is a duplication of the above indicator</i>	
HRDD completed?		Yes / No	If the answer is ‘yes’, this lowers the risk	<i>Completing effective HRDD lowers risk</i>
3 rd party certification?		Yes / No	If the answer is ‘yes’, this lowers the risk	<i>Vessels successfully audited to recognised standards offer more assurances than uncertified vessels</i>
Do crew have employment agreements / clear employment rights?		Yes / No	If the answer is ‘yes’, this lowers the risk	<i>This indicator would show that crew understand and agree to their terms of employment</i>
Effective grievance mechanism?		Yes / No	If the answer is ‘yes’, this lowers the risk	<i>An effective grievance mechanism means that workers feel safe reporting issues</i>
Active Union / Fisherman’s Association?		Yes / No	If the answer is ‘yes’, this lowers the risk	<i>This means that workers have freedom of association</i>
Health & Safety inspections? (ILO C188 / Coastguard)		Yes / No	If the answer is ‘yes’, this lowers the risk	<i>This shows that vessels are inspected to be seaworthy</i>
Presence of migrant labour		Yes / No	If the answer is ‘yes’, this increases the risk	<i>This is because migrant labour can be vulnerable and taken advantage of</i>
Recruitment (Fees / Agents)		Yes / No	If the answer is ‘yes’, this increases the risk	<i>The presence of recruitment agencies could indicate that workers are paying recruitment fees as part of their hiring process</i>

11. Transshipment



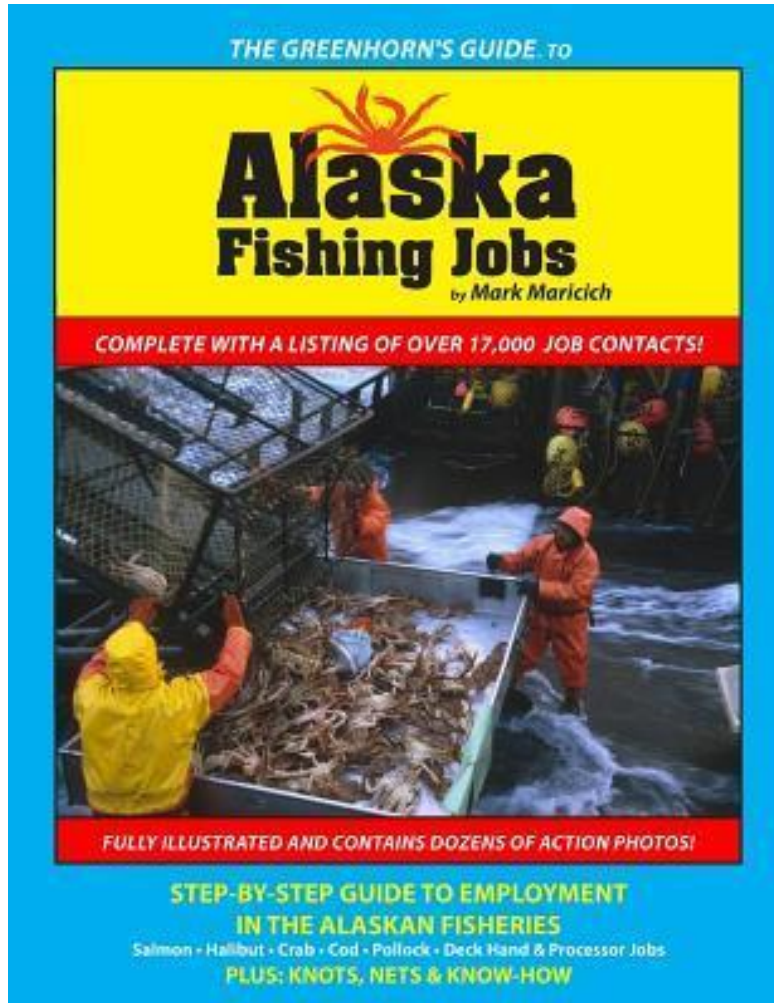
12. Human Rights Due Diligence completed



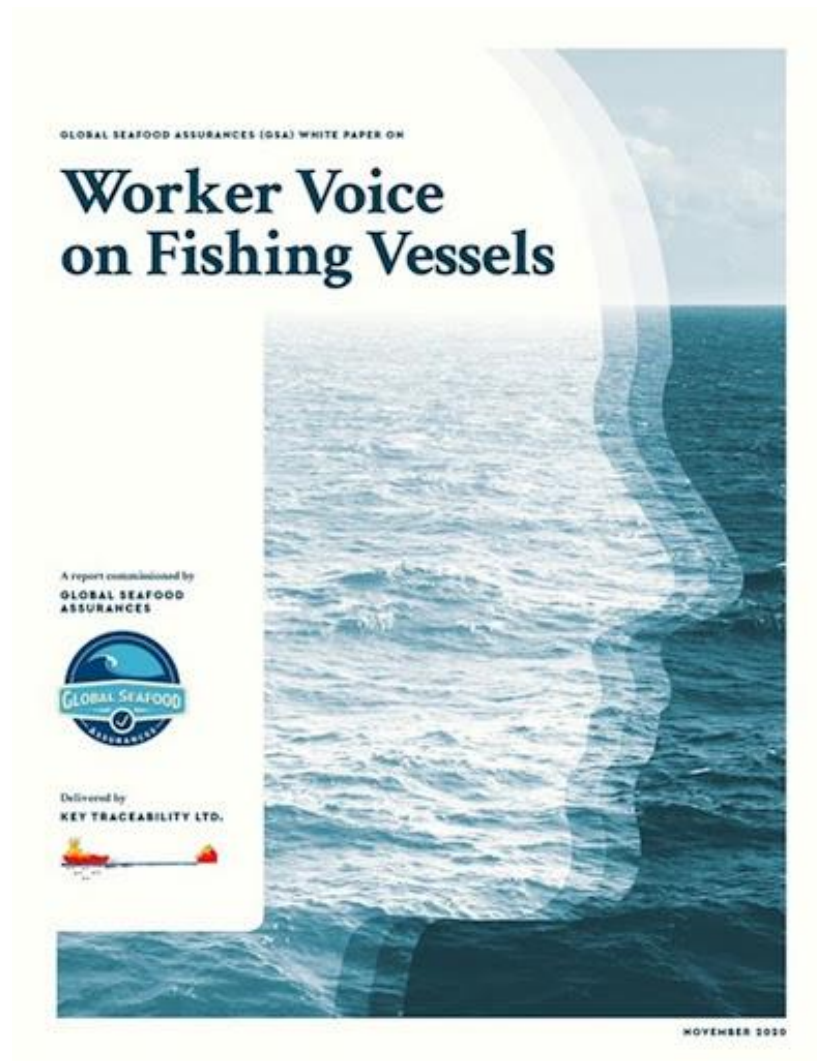
13. Third Party Certification



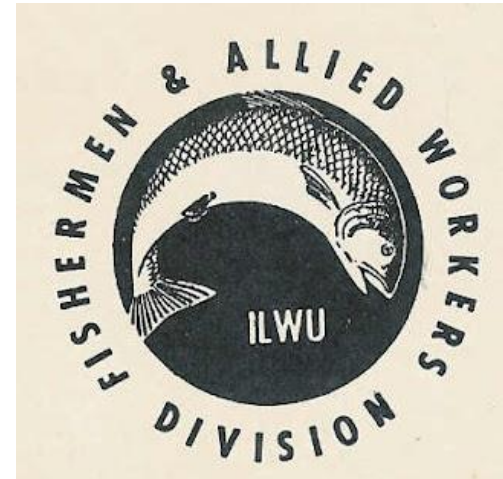
14. Crew contracts / Clear worker rights



15. Effective Grievance Mechanism in place



16. Fishers Union



17. Recruitment fees



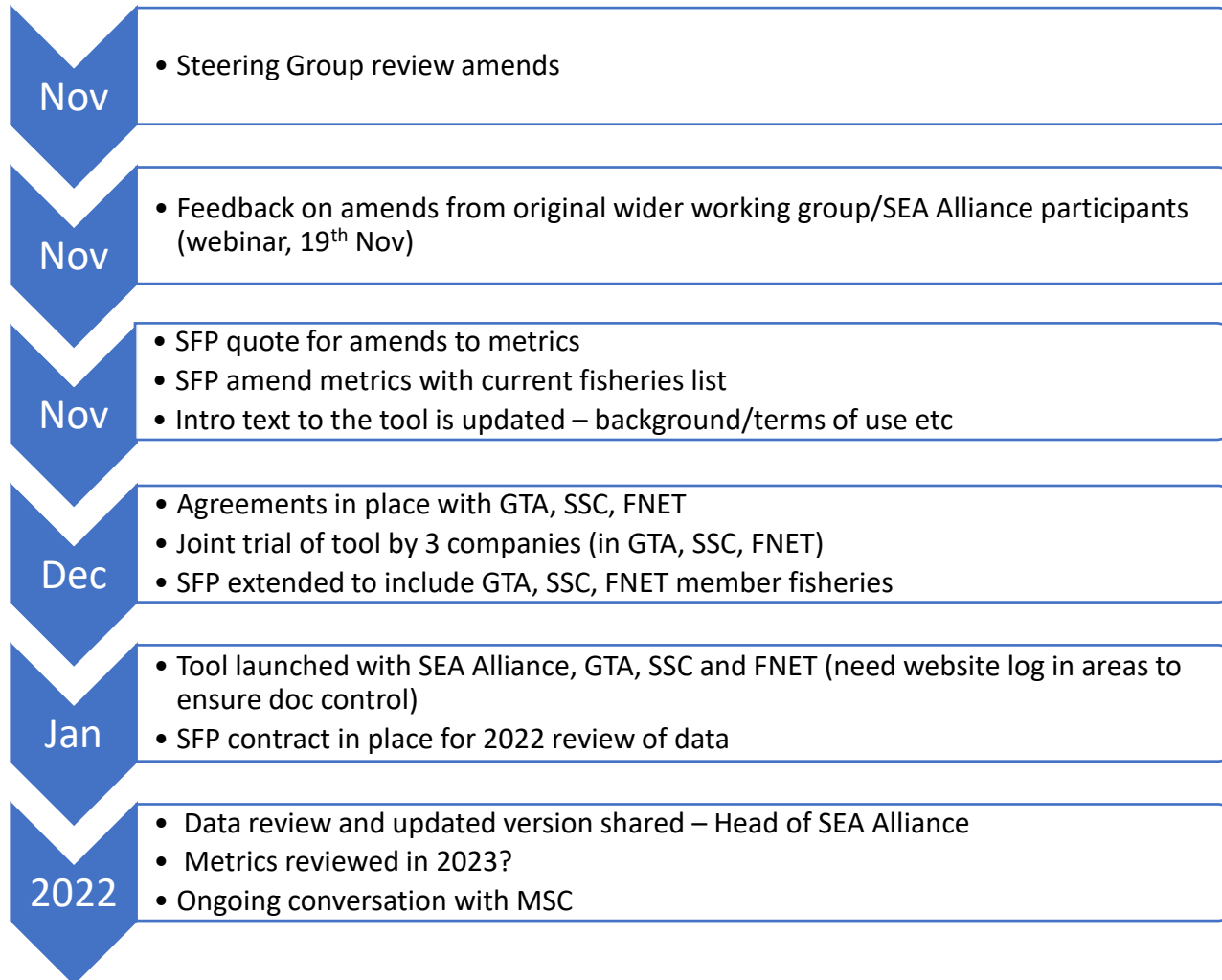
18. Health and Safety inspections

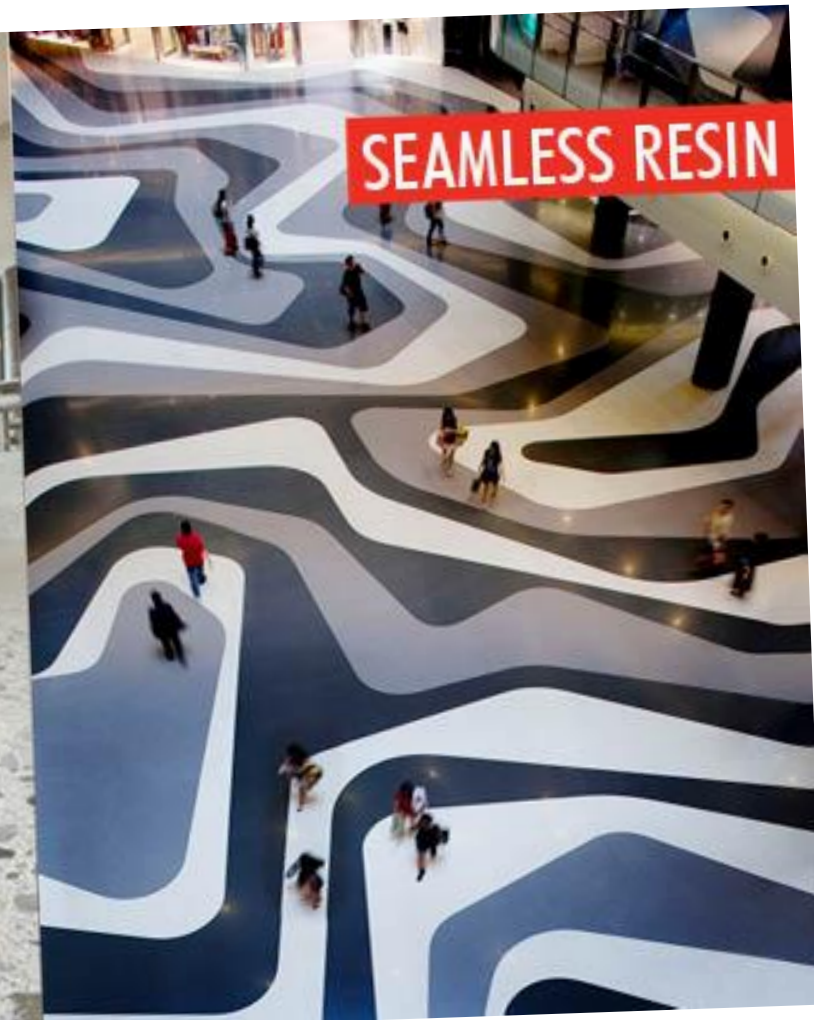


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9. Migrant workers employed on vessels	Y/N – No = reduces risk?
10. Time spent at sea	Add times – which +/- risk
11 – Transshipment	Data field
12. The fishery has completed HRDD/Risk Assessment and has a plan to address risks	Y/N – Y reduces risk
13. The fishery has a third party social certification	Y/N – Y reduces risk
14. Crew have clear employment rights and/or employment agreements	Y/N – Y reduces risk
15. Crew have an effective grievance mechanism in place	Y/N – Y reduces risk
16. Crew have the opportunity to be represented by an active union or, in the absence of a union, a fishers association	Y/N – Y reduces risk
17. Recruitment agents, labour providers and/or recruitment fees are present	Y/N – N reduces risk
18. Credible health and safety inspections take place	Y/N – Y reduces risk (national inspections, vessel certification, implementation of ILO188)

Next steps:







SEAA participants Feedback

1. Any questions or clarifications on the project or tool?
2. Insights from participants on how you would use the tool...
3. Functionality;
 - a. Usability – Can you use the tool as it is for the purpose you intend?
What other information do you need to help you get your company on board with adopting the tool?
 - b. “supply chain context” –
 - Would you complete this section?
 - What guidance needs to go with the tool to support you in identifying why these are risk areas and if they are adequately mitigated?
 - Does the tool need a score incorporating the supply chain context information, or is the current scoring enough for how you want to use the tool?
4. Volunteers to trial the tool in December and feedback – looking for 5 companies – representing FNET, SSC and GTA membership