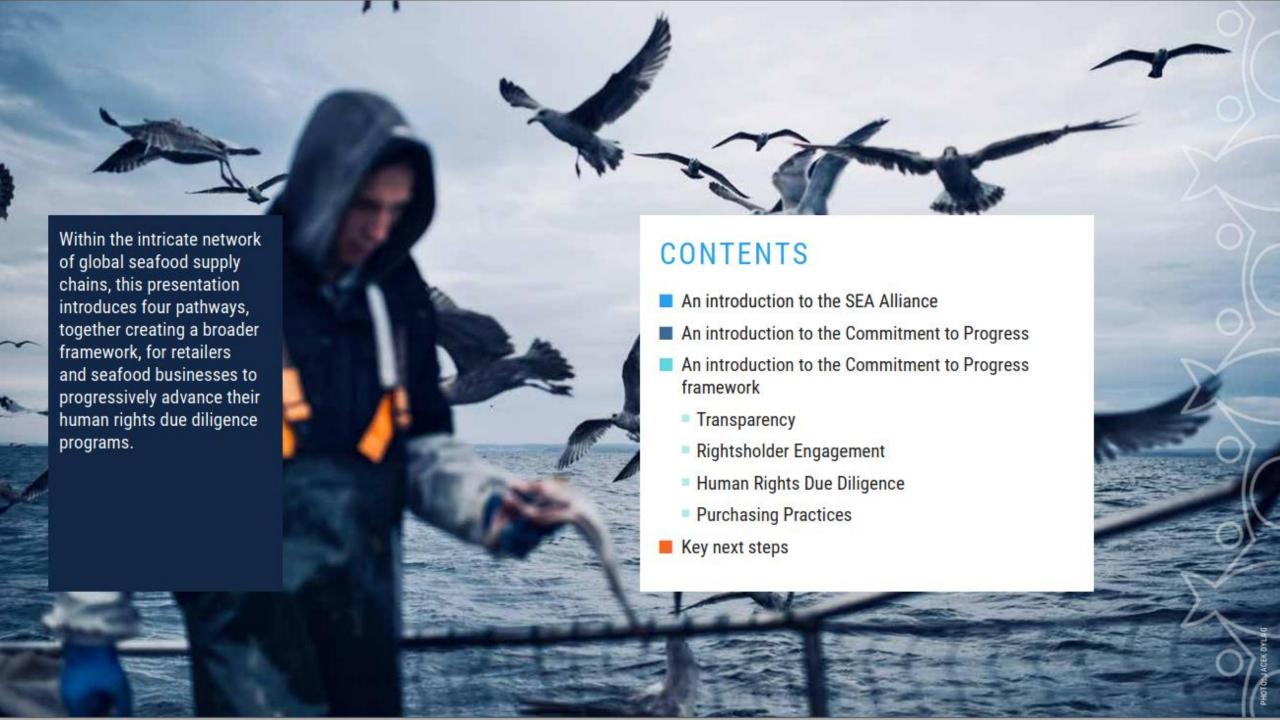




THE SEAFOOD ETHICS ACTION ALLIANCE

COMMITMENT TO PROGRESS

A FRAMEWORK FOR THE PROGRESSION OF CORPORATE HUMAN RIGHTS DUE DILIGENCE IN SEAFOOD SUPPLY CHAINS



WHO ARE THE SEAFOOD ETHICS ACTION (SEA) ALLIANCE



The Seafood Ethics Action Alliance (SEA Alliance), established in 2018, is a precompetitive collaboration of retailers and seafood businesses aiming to strengthen human rights due diligence carried out in global seafood supply chains and ensure respect for human rights.

The SEA Alliance is comprised of over 35 member companies, including the 11 largest UK retailers and leading seafood businesses and brands, alongside retail and industry trade bodies. The SEA Alliance membership accounts for over 95% of UK grocery retail sales, and its members have global operations and supply chains.

The work of the alliance is built upon three primary focus areas.

HUMAN RIGHTS DUE DILIGENCE

In this core aspect of our efforts, the alliance convenes to address emerging risks within our supply chains. We create resources to enhance our members' broader human rights due diligence initiatives, while also engaging in diverse activities aimed at advancing human rights diligence within the seafood industry.

ADVOCACY AND ENGAGEMENT

In this key pillar of work, the alliance harnesses its collective influence to drive change across various fronts. Aligned with our advocacy strategy, we focus on championing three pivotal instruments: ILO's C.188, The Cape Town Agreement, and the Port State Measures Agreement. Additionally, we leverage our combined strength for endeavours beyond our outlined strategy, communicating with key stakeholders in the seafood industry, including standards and certifications bodies, on labour standards.

CHANGE ON THE WATER

Our Change on the water pillar is built around our Change on the water fund which supports projects in our member company supply chains that positively impact the human rights and labour standards of fishers and aquaculture workers. The aims of the fund are to accelerate change at fishing fleet and aquaculture producer level and explore common indicators for measuring change; to pilot a collaborative model for addressing human rights and labour issues that acknowledges shared responsibility for supply chain partners; to prove the concept that interventions in supply chains can address human rights risks and benefit the seafood sector.



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AN INTRODUCTION TO THE COMMITMENT TO PROGRESS

In April 2023 SEA Alliance began the journey to develop a charter of commitments.

The charter began its development at Seafood Expo Global where a group of stakeholders, all focused on improving the rights of seafood workers, shared ideas on what businesses could do to make these improvements happen.

Following the maiden meeting, individual consultations began with a range of stakeholders including private sector representatives, both in and outside of SEA Alliance membership, NGO's, non-profit organisations and others. Through these consultations the original format of a commitment charter developed into pathways for businesses to follow. These pathways covered the areas of transparency, rightsholder engagement, human rights due diligence and purchasing practices.

Towards the end of 2023 members of the SEA Alliance began group consultations on the development of these individual pathways. Although good strides had been made in establishing the steps that needed to be taken, the pathways were linear in their achievement and lacked the sense of continuous improvement at the heart of this initiative. This realisation led to the pathways taking the form of a framework which acts as a continued cycle of actions with continued progress being required against each step.







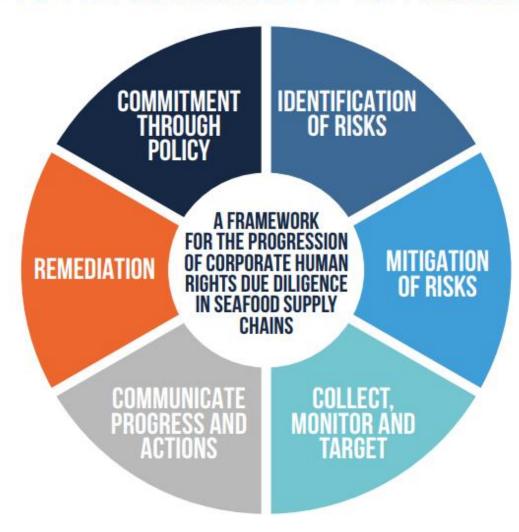


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AN INTRODUCTION TO THE COMMITMENT TO PROGRESS

The Commitment to Progress framework delineates the essential actions businesses must undertake, and progress against, to enhance human rights due diligence within seafood supply chains. It encompasses commitments related to policy formation, risk assessment and mitigation strategies, data collection and monitoring, establishment of accountability targets, transparent communication on progress, and remediation expectations.

The SEA Alliance anticipates providing support to its members in advancing within this framework and facilitating collective efforts to achieve progress in specific areas.







TRANSPARENCY

The Transparency pathway is a pivotal route within our commitment framework, serving as a key aspect for businesses seeking to elevate their practices within seafood supply chains.

At its core, the Transparency pathway encompasses two vital aspects. Firstly, it compels businesses to share data transparently regarding their supply chains, labour force, and their public commitments and advancements within the Commitment to Progress. This transparency demonstrates accountability, building trust amongst stakeholders and supporting industry-wide ethical standards.

Secondly, the Transparency pathway accentuates the critical role of traceability in achieving genuine transparency. Before

businesses can be forthright with data, they must possess a comprehensive understanding of their supply chains.

Traceability, therefore, becomes the foundational prerequisite for authentic transparency, allowing businesses to track the journey of seafood products from source.



Develop and publish a policy outlining your company's commitment to work towards supply chain transparency. Identify your current supply chain visibility including details such as vessels, recruitment agencies, processing sites and worker details. Develop actions that improve the collection and quality of the data available to you. Establish key performance indicators that measure the quality of the data collected. Publish your seafood supply chain information, acknowledging any gaps, and prioritising different supply chains to showcase progress effectively. Ensure the capability to provide supply chain details promptly upon request, enabling downstream actors to conduct due diligence and remediation actions effectively.

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RIGHTSHOLDER ENGAGEMENT

It is indisputable that to undertake meaningful corporate human rights due diligence, workers and other rightsholders within the supply chain need to be consulted and involved.

This pathway advocates not merely for rightsholder inclusion in decision-making processes, including the appropriateness and effectiveness of the remediation they may receive, but for the removal of barriers that obstruct effective communication.

Without this essential dialogue, the efficacy of subsequent steps in the framework is compromised, thereby diminishing the impact of a business's broader due diligence efforts.



Commit through policy to conducting meaningful consultations with rightsholders or their representatives in the design and implementation of effective human rights due diligence and any remediation actions.

Conduct a rightsholder identification analysis and map out barriers to effective engagement.

Communicate with rightsholders regularly through mechanisms such as worker representatives, interviews, general meetings and surveys.

Implement actions that remove barriers to organisation for workers.

Collect, document and utilise data from worker representation mechanisms to inform and improve decision-making processes and identify supply chain needs.

Publicly report on your engagement with rightsholders.

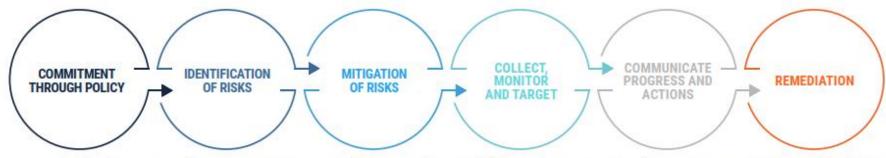
Engage rightsholders on remediation and support access to remediation efforts.



HUMAN RIGHTS DUE DILIGENCE

The human rights due diligence pathway serves as an important component to the Commitment to Progress framework, as its actions reverberate across all other pathways. It provides transparency regarding a business's approach to addressing supply chain risks, tracks progression within the

framework, and fosters awareness of workers' rights. From initial risk identification to the implementation of effective remedies, this pathway outlines high-level action areas which crucially impact a robust corporate human rights due diligence program.



Commit to having comprehensive policies in place covering due diligence processes and actions utilising strong language to cement your commitment.

Conduct an assessment of actual and potential human rights risks and their impacts in your own operations and in the supply chain. Actively engage and collaborate with industry stakeholders to leverage collective influence and enhance knowledge sharing, aiming to elevate standards and practices beyond current norms.

Establish key performance indicators from which to measure the success of your human rights due diligence programme. Annually report on your detailed progress across each of the pathways.

Participate in remediation efforts within your supply chain, which may be through direct actions, financial contributions or whatever is in the best interest of the worker.

Offer training, increase rights awareness, and enhance capacity for suppliers across the supply chain.



PURCHASING PRACTICES

Within the complex tapestry of supply chains, the purchasing practices employed by businesses hold a significant influence over the fate of labour standards and worker rights. This pathway recognises that the decisions made in procurement are a linchpin

for either advancing or impeding these critical facets of a supply chain. Therefore, it is crucially important that these considerations occupy a central role in contract negotiations, agreement formations, and performance evaluations.

To effect substantial and continuous improvements in human rights and labour standards, a transformation in business culture is often a prerequisite. The Purchasing Practices pathway explores the steps necessary to instigate this change.



Develop and publish a purchasing practices policy that outlines your commitment to both purchasing practices and your commitments to both buyers and suppliers. Assess your business's purchasing practices and identify what can contribute and may potentially contribute to human rights risks within your supply chain. For example, price not covering the cost of labour and setting unmanageable lead times.

Incorporate ethical and human rights standards into supplier agreements and contracts as a firm commitment.

Provide ongoing training for commercial, buying and, where possible, executive teams on the impacts of their purchasing decisions. Establish quantifiable and manageable worker rights focused targets for your commercial and buying teams. Publicly report on your purchasing practices as well as your approach to supplier selection. Maintain awareness of your businesses purchasing practices impact to ensure lead times are manageable and do not lead to an elevated risk to workers.



KEY NEXT STEPS

ADDITIONAL GUIDANCE

Another element that is crucially important to the effective implementation of this framework is the creation and provision of additional supplementary guidance on actionable steps for businesses.

While initial guidance development is underway and some will be integrated into the Commitment to Progress publication, we see the further development of this to be a key next step. We envision this next steps as a collaborative effort with key partners involved in shaping the original framework.

VERIFICATION OF PROGRESS

We acknowledge that the verification of progress against this framework is key to its impact.

A key next step for us is to finalise the development of a verification framework for us to monitor member's progress.

We plan to trial this with a retail member of the SEA Alliance to better inform how progress in verified across the membership.



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