SeaBOS

SUPPORTING DOCUMENT
DECEMBER 2020

Tool kit in support of SeaBOS commitments and goals (Task Force I)

Introduction

At the October 2020 meeting SeaBOS companies agreed to:

1. Have no IUU fishing products or forced/bonded/child labour in their own seafood operations by October 2021.
2. Put science-based measures in place that, when combined, substantially reduce the risk of IUU fishery products or forced/bonded/child labour in their supply chains.
3. Act swiftly and transparently on any evidence that IUU fishing and forced/bonded/child labour activities exist within their operations and supply chains, in recognition that these activities are endemic within the global seafood industry and require continuous vigilance by all actors.

Taking these challenges into account, SeaBOS members are convinced that the science-based measures that will be put in place, along with continued policy engagement, will support the elimination of both IUU fishing and forced/bonded/child labour in their supply chains. They will report in October 2022 and October 2025 on progress towards meeting their goals.

These commitments represent a substantial challenge for the complex operations of SeaBOS members and there are many possible ways to achieve the outcomes sought. This document, therefore, presents a 'tool kit' of actions that are likely to be helpful, along with techniques that have been used by SeaBOS members (including those relating to traceability) to address the challenges of IUU and labour issues in their own operations, and throughout their supply chains. As experience grows, additional tools will be added.

The recommendations and suggested tools to prevent the existence of IUU fishing products or forced/bonded/child labour have been carefully considered, but are nonetheless not to be understood as prescriptive. Each individual member company undertaking preventative measures must, at each time, evaluate the considered measure based on applicable and relevant conditions and also legally review any measures, including from a fair trade and anti-trust perspective.

1. Governance of own operations and supply chains

Supply chain management requires that policies are put in place; that there is an internal knowledge about the content and sustainability status of the supply chain; that due diligence is used to understand supply chain risks; and that companies actively engage with suppliers throughout their supply chains. Mechanisms that have been shown to be effective and are used by a number of SeaBOS members already, include:

1.1 Internal company policy documents

- Develop company policy documents (e.g. responsible sourcing policies) for raw materials caught or sourced that highlight the urgency of addressing, reducing and eliminating IUU fishing.
- Develop company policy documents (e.g. code of conduct) for addressing the issue of eliminating forced, bonded and child labour.
- These company policy documents should be publicly available (where not commercially confidential) and be used for communication and training purposes.
- Communication associated with company policy documents should include protocols for auditing compliance and remediating issues found.

1.2 Company policy documents for Tier 1 suppliers

- Ensure that Tier 1 raw materials suppliers demonstrate acceptance of company policy documents with respect to raw materials.
- Ensure that Tier 1 suppliers demonstrate acceptance of company policy documents with respect to labour standards.

Note: Learning can be derived from members who have already made these policy documents public.*

1.3 Mapping own operations and Tier 1 in the supply chain

Companies should map their own operations and Tier 1 in the supply chain by applying materiality analysis (i.e. capturing the most impactful aspects of their operations).

- Make an inventory of your portfolio of marine resources, the status of the resources used, and ways to improve traceability and sustainability.
- Map workers and operational sites in your own operations.
- Progressively develop greater insights of the status of raw materials from Tier 1 suppliers and where workers sit in your supply chain.

Note: Learning can be derived from members who have already mapped their marine resources.†

1.4 Science-based due diligence of risk and decision making

- Use a scientific assessment of risk, your own knowledge and other sources of intelligence to identify areas of activity that may require additional due diligence.
- Using your understanding of areas with higher levels of risk, design and implement auditing processes that will mitigate these risks (taking actions and reporting on findings where appropriate).
- Evaluate the relevance of the schedule of possible voluntary actions (see separate document) for mitigating risks you have identified.

1.5 Engaging in collaboration beyond Tier 1 suppliers

- Identify who are the most significant suppliers on a basis that is suitable to your business (e.g. by volume of raw materials or by financial spend) and informed by risk evaluation, and develop a dialogue with them as to how the whole supply chain might be free from IUU fishing and forced/bonded/child labour.
- Develop knowledge of supply chains taking in your own operations, Tier 1, Tier 2 and Tier 3 suppliers (this may need to be prioritized by species, perceived risk, or value of production).
- Collaborate within SeaBOS to support tackling forced/bonded/child labour issues (see e.g.‡)
- Collaborate with relevant governments and other agencies or initiatives on improving outcomes for IUU fishing and forced/bonded/child labour, and provide information on the effectiveness of these collaborations. Possible means to do this include promoting implementation of the PSMA agreement, transparent vessels registry, active engagement in Fisheries Improvement Projects (FIPs), as well as seeking to unite industry, government, civil society, and relevant organisations to focus actions against IUU fishing.
- Collaborate with other bodies (e.g. certification bodies and civil society) to support the credentials of raw materials and labour used in supply chains.

2. Advancing traceability

Traceability represents an opportunity to better understand the content and dynamics of complex supply chains and is instrumental for identifying data gaps and supply chain risks. Traceability also supports administrative improvements such as stock and inventory control; recall of products; QA processes, and branding initiatives. Additionally, it is perceived that using the IoT digital technology may prove an effective tool to address concerns and distinguish those businesses adopting latest onboard vessel technological tools. Substantial work among policy makers, NGOs and industry, and advances in technologies, are all contributing to developing leadership options. Tools for advancing traceability include:

* Cargill – Code of Conduct (available in 28 languages) https://www.cargill.com/about/supplier-code-of-conduct
  - Japanese: https://www.cargill.com/doc/1432110367992/supplier-code-of-conduct-pdf_ja.pdf
  - Korean: https://www.cargill.com/doc/1432110368156/supplier-code-of-conduct-pdf_ko.pdf
  - Norwegian: https://www.cargill.com/doc/1432110368605/supplier-code-of-conduct-pdf_no.pdf
  - Thai: https://www.cargill.com/doc/1432110369378/supplier-code-of-conduct-pdf_th.pdf

Nutreco – Code of Conduct (https://www.nutreco.com/globalassets/nutreco-corporate1/corporate/code-of-conduct/code-of-conduct---english.pdf)

Thai Union – Code of Conduct (https://www.thaiunion.com/en/sustainability/code-of-conduct)

† Nissui supply chain methodology and results (page 28) https://s3-ap-northeast-1.amazonaws.com/sustainability-cms-nissui-s3/pdf/en/2020_sustainability_full_en.pdf

‡ Alliance 8.7 https://www.alliance87.org/.

- Supporting adoption of Global Dialogue on Seafood Traceability (GDST) standards 1.0 as providing key data elements and interoperability systems for traceability.
- Identifying the Key Data Elements relevant to your operations for traceability.
- Connecting your traceability approach to those of your supply and value chain and encourage use of interoperability systems.
- Piloting of technologies that will support traceability development and providing feedback on their effectiveness.

Note: Experimentation and mutual learning have been spearheaded by Nutreco. Thai Union, Cargill Aqua Nutrition and Austral Fisheries can also support this work.

3. External reporting and accountability

External reporting clarifies objectives to external stakeholders and also represents an important process for increased internal communication and verification of progress made, including how time bound goals are being achieved and how companies are progressively implementing relevant components of this tool kit or using other tools to achieve these outcomes. Timelines for reporting on progress in Task Force I goals are October 2022 and October 2025. Reporting will be within SeaBOS members' own reporting routines while a combined 'SeaBOS' report will also be developed on these timelines.

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