New Tools For Seafood Businesses To Understand Human Rights Risks And Improve Social Compliance

Seafood Expo North America
FishWise: Sustainable Seafood Consultancy

- Seafood policy development
- Sourcing support
- Traceability & Human Rights
Working with businesses to solve sustainable seafood’s biggest challenges
New Tools For Seafood Businesses To Understand Human Rights Risks And Improve Social Compliance

Seafood Expo North America
How can companies assess social risks in their supply chains?

Dr Tom Pickerell, Technical Director
@drpickerell
• The UK Seafood Industry Authority
• A Non-Departmental Public Body
• Funded by a levy on first sale of Seafood (domestic & imports; not diadromous)
• Report to all 4 UK Fisheries Ministers
Seafish & Seafood Social Responsibility

- Responsible Fishing Scheme (RFS)
- UK Supply Chain Risk Assessment
- Seafood Ethics Common Language Group (SECLG)
- Reykjavik Group
- Outreach
- Risk Assessment for Sourcing Seafood (RASS)
How the Work Areas Inter-relate

UK Supply Chain Risk Assessment

SECLG

Reykjavik Group

Outreach

RASS
Risk Assessment for Sourcing Seafood

RESPONSIBLE FISHING SCHEME
How the Work Areas Inter-relate

- UK Supply Chain Risk Assessment
- SECLG
- Reykjavik Group
- Outreach

RASS
Risk Assessment for Sourcing Seafood
Drivers for the Risk Tool

• “What are the risks?”
• “Where are the risks?”
• “How do we eliminate them?”
SECLG Requests for Risk Tool

- Industry wants one risk assessment tool
- Industry input essential – can’t be imposed upon
- Clarity on what happens after the initial risk rating; understanding what you would need to do if a risk was highlighted.
- Identify where the next threat may be to business
- Potential synergies with business intelligence tools to look at other areas of fraud i.e. food fraud.
Our Approach
External Expertise

• Katrina Nakamura (Sustainability Incubator)
  - Labor Safe Screen

• Lori Bishop (Humanity United)
The Concept

- Based on approaches used in risk scoring tools for sustainability
- Focused on at-sea wild-catch
- Transparent decision rules
- Use publicly available data from verified sources
### The Concept – Risk Levels

<table>
<thead>
<tr>
<th>Risk Level</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>HIGH</td>
<td>Credible public evidence documenting slavery in the fishery, or evidence indicating that forced labor is not an isolated incident in the seafood sector of a given country/region.</td>
</tr>
<tr>
<td>MEDIUM</td>
<td>Poor regulatory and operating environment, with respect to seafarers and workers more generally, but lacking definitive documentation of slavery in the fishery.</td>
</tr>
<tr>
<td>LOW</td>
<td>No or weak evidence of slavery in the sector PLUS strong regulatory environment.</td>
</tr>
<tr>
<td>Threat level:</td>
<td></td>
</tr>
<tr>
<td>--------------</td>
<td></td>
</tr>
<tr>
<td>HIGH RISK</td>
<td></td>
</tr>
<tr>
<td>Has human trafficking been found in this <strong>fishery</strong> in the past 3 years?</td>
<td></td>
</tr>
<tr>
<td>1. <strong>Is slavery occurring in this fishery?</strong></td>
<td></td>
</tr>
<tr>
<td>2. <strong>Is seafood from this origin on a list of products made by forced, child labor or human trafficking?</strong></td>
<td></td>
</tr>
<tr>
<td>YES → NO → Fishery is HIGH Risk for slavery → Watch</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>WATCH</th>
</tr>
</thead>
<tbody>
<tr>
<td>Is the <strong>fishing country</strong> on a watch list for failing to provide sufficient protection?</td>
</tr>
<tr>
<td>3. <strong>Is trafficking in fishing occurring in this country? Is it on a watch list for deficient protection?</strong></td>
</tr>
<tr>
<td>4. <strong>Are fishing crew unprotected from trafficking by the regulatory framework?</strong></td>
</tr>
<tr>
<td>YES → NO → Country on WATCH LIST</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>NO ALERT NOW</th>
</tr>
</thead>
<tbody>
<tr>
<td>Are any regulatory measures reducing risks of slavery in fishing?</td>
</tr>
<tr>
<td>NO PROOF? ↓ NO</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>No H or WATCH (+ MEASURES) LOW RISK</th>
</tr>
</thead>
<tbody>
<tr>
<td>Risks are being Reduced ↓</td>
</tr>
<tr>
<td>Are any voluntary measures reducing risks of slavery in fishing?</td>
</tr>
<tr>
<td>PROOF? NO ↓</td>
</tr>
<tr>
<td>Risks are being Reduced Score Unknown</td>
</tr>
</tbody>
</table>
Next Steps

- Build a prototype
- Pilot 12 fisheries
- External Review (seeking road-testers)
- Feedback & Revision
- Establish ‘host’ website
- Roll-out on RASS, FishSource & Seafood Watch
Drivers for the Risk Tool

- “What are the risks?”
- “Where are the risks?”
- “How do we eliminate them?”
“How do we eliminate them?”

- Number of tools/initiatives that exist (i.e. RFS)
- Malta Workshop to bring together
- Supply Chain tool to collate tools/initiatives
Thank you
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Seafood Expo North America
• Aurora Alifano – FishWise

• Mia Newman – Humanity United

• Shawn MacDonald - Verité

• Tom Pickerell – Seafish
Trends: Increased Government and Media Awareness

- United States Government Action
- Global Government Action
- Guidelines by International Multilateral Organizations
- Media and Public Interest

Key Events:
- Palermo Protocol
- US Trafficking Victims Protection Act (TVPA)
- US First State Dept. Trafficking in Persons (TIP) Report
- US TVPA Reauthorization
- UN Human Rights Council Endorsed Guiding Principles on Business and Human Rights
- EU Directive on Preventing and Combating Trafficking in Human Beings
- US Business Supply Chain Transparency Act Introduced
- US TVPRA
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- US Dodd-Frank, Section 1502 on Conflict Minerals
- UK Bribery Act Focuses on Supply Chains
- OECD Guidelines on Multinational Enterprises
- EU Timber Regulation
- EU Modern Slavery Act
- US E.O. Strengthening Protection Against Trafficking in Persons in Federal Contracts
- US TIP Report Focuses on Supply Chains
- US TVPRA
- US TVPRA
- FLR Legislation Passes Senate as part of Immigration Reform Package
- Pope Francis Speaks Against Human Trafficking
- Verité Exposes Forced Labor in Malaysian Electronics
- AP Story on Slavery in Seafood Industry
- WSJ Palm Oil Migrant Workers Story
- Bloomberg Palm Oil Investigation
- Guardian breaks Thai Seafood Story
- Rana Plaza Factory Collapse
- Barack Obama Speech on Modern-Slavery
- Guardian Nepali Workers in Qatar Story

United States Government Action
Global Government Action
Guidelines by International Multilateral Organizations
Media and Public Interest

Author Research
Governments Putting Pressure on Corporations to Disclose Anti-Human Trafficking Precautions

**United States**
- Executive Order 13627
- 300,000 companies

**California**
- SB 657: Transparency in Supply Chains Act
- 2,000+ companies

**California**
- SB 477: Foreign Labor Recruitment Law

**United Kingdom**
- Modern Slavery Act
- 12,000+ companies

**European Union**
- Directive
- 6,000+ companies

**Executive Order 13627**
- HR 4842: Business Supply Chain Transparency on Trafficking and Slavery Act
Trends: Corporations Increasingly Under Public Scrutiny for Labor Abuses

Lawsuit against Costco: Label shrimp as product of slavery


Costco faces lawsuit over sale of prawns allegedly farmed by slave labor

Lawsuit Accuses Nestlé of Using Slave-Caught Fish in Fancy Feast
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