THE LINKS BETWEEN IUU FISHING, HUMAN RIGHTS, AND TRACEABILITY

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FISHWISE

LINKS

Overview

Illegal, unreported, and unregulated (IUU) fishing threatens marine ecosystems and global food security. This unsustainable practice and the networks supporting it may also be involved in transnational crime and other illicit activity such as human rights abuses, human trafficking, and forced labor.[1] Companies that sell seafood can play an integral role in combating IUU fishing and its associated crimes. Full-chain traceability can help identify products at risk for IUU fishing, human rights abuses, and seafood mislabeling and fraud, and is a critical tool for identifying and addressing these risks.

The Links

Overfishing and IUU fishing have resulted in diminishing fish stocks and led to a decrease in the return on investment for fishing companies and vessel captains.[2] Depleted resources in nearshore waters force vessels to go further out to sea and for longer periods of time to fill their catch quota, increasing fuel and vessel maintenance costs.[3] These circumstances, combined with a high global demand for seafood, increase incentives for overfishing and other illegal fishing practices.

In order to maintain profits, fishing companies may seek to reduce the operating costs within their control such as reducing crew sizes, relying on inexpensive migrant labor, increasing work hours, and ignoring important health and safety measures.[4] Undocumented steps in supply chains pose particular areas of high risk due to lack of transparency. For example, in 2015 an Associated Press investigation found shrimp peeling sheds without adequate supply chain oversight were operating illegally and using trafficked laborers. [5]

One challenge facing government institutions and the seafood industry today is that the true extent of illegal activity and human or labor rights violations are difficult to quantify because these practices may be intentionally hidden. The practice of unauthorized transshipment, the lack of adequate fisheries monitoring, control, and surveillance (MCS) systems, and the lack of transparency of vessel owners and vessel histories has further facilitated an environment where human rights and environmental violations can occur with impunity.

[1] U.S. State Department. https://www.state.gov/e/oes/ocns/fish/illegal/
[2,3] UN Food and Agriculture Organization. http://www.fao.org/3/a-i5555e.pdf
[4] ILO. http://www.ilo.org/asia/publications/WCMS_BK_PB_67_EN/lang--en/index.htm
[5] Mason et al. The Associated Press.https://www.ap.org/explore/seafood-from-slaves/global-supermarkets-selling-shrimp-peeled-by-slaves.html

Traceability Through Key Data Elements

To combat these issues, companies can focus their efforts on building a comprehensive sustainability program focused on full-chain electronic traceability. Improving traceability through data collection allows companies to identify and address products at risk of being associated with IUU fishing, mislabeling and fraud, and human rights issues. This process requires that companies collect key data elements (KDEs) about the source of each product, such as location of fishing or farming, flag of the vessel, method of production, etc. A robust traceability system will allow critical product KDEs to be communicated throughout the supply chains.

The Global Dialogue on Seafood Traceability (the Global Dialogue), an international business-to-business platform established to advance a unified framework for interoperable seafood traceability practices – has already begun working to develop an internationally agreed upon list of KDEs to be routinely associated with seafood products, and to establish routine business norms and practices for traceability.

The Global Dialogue aims to produce a KDE list by end of 2018. Pending the outcomes of the Global Dialogue, companies can look at the following five sources of guidance on the collection of seafood KDEs in order to inform near-term improvements or changes to their data collection practices. These sources are:

- U.S. Seafood Import Monitoring Program (SIMP);
- EU IUU Regulation (EC No 1005/2008);
- The Conservation Alliance for Seafood Solutions provides recommendations for both basic and additional information companies should collect and monitor about products;
- WWF's Traceability Principles for Wild-Caught Fish Products; and
- Best practice KDEs in the context of enabling global interoperable seafood traceability.

It will be important to monitor KDE developments and ensure that the KDE practices a company implements now are periodically reviewed and updated to reflect evolving industry best practices. Collecting information on KDEs can help companies in their efforts to reduce IUU fishing and seafood mislabeling or fraud. Some KDEs are also valuable starting points for analyzing human rights risks such as the flag state, company name, and whether transshipment is typically associated with the target species. However, additional information is needed to understand labor conditions within supply chains.

The Unique Nature of Human Welfare KDEs

Understanding working conditions in seafood supply chains requires the collection of additional information on a variety of elements relevant to human and labor rights. These human welfare KDEs may not travel with the product, but can be collected through other mechanisms. While only a snapshot in time, social audits, surveys, and self-assessments provide companies with key data to assess risk and areas for improvement. Possible examples of this data include, but are not limited to worker identification, vessel conditions, hours and overtime worked, and wages paid. Best practice for social audits includes collecting information directly from workers through confidential interviews and other worker voice methods.
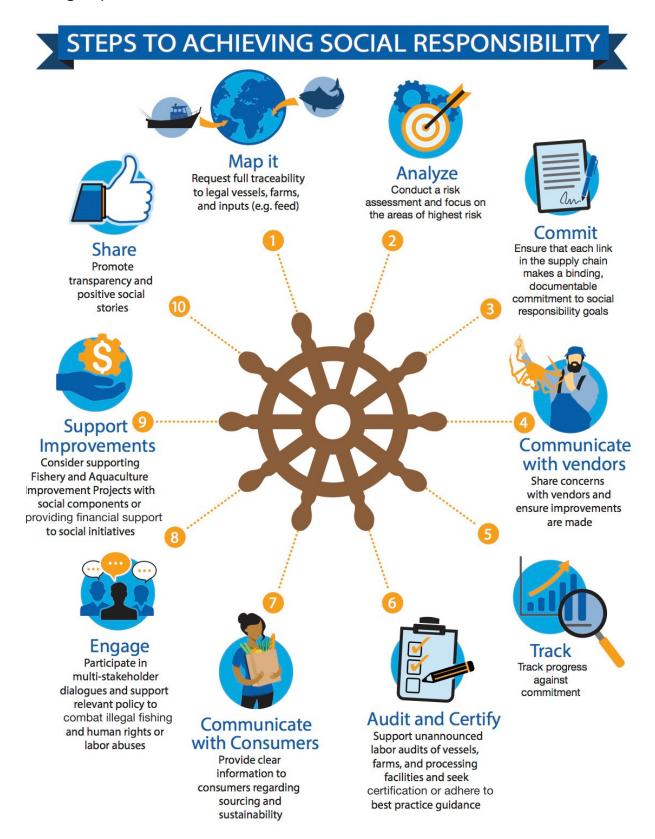

Incorporating Human Welfare KDEs

The adoption and incorporation of human welfare KDEs into a traceability program is a foundational step towards socially responsible seafood. These KDEs will provide objective criteria in order to assess supply chains and address specific areas of high risk, such as worker health and safety. For a comprehensive list of additional seafood KDE examples and initiatives, please refer to FishWise's *Key Data Elements for Seafood: A Compilation of Resources report.*

FishWise also developed *Social Responsibility for Seafood Supply Chains: A Compilation of Resources*, which summarizes practices and additional information related to social responsibility, worker well-being, and human rights in seafood.

While establishing a comprehensive traceability program is a necessary step, more actions are needed to move towards socially responsible seafood. For example, we recommend the following steps:

STEPS TO ACHIEVING SOCIAL RESPONSIBILITY

1 Map it
Request full traceability to legal vessels, farms, and inputs (e.g. feed)

2 Analyze
Conduct a risk assessment and focus on the areas of highest risk

3 Commit
Ensure that each link in the supply chain makes a binding, documentable commitment to social responsibility goals

4 Communicate with vendors
Share concerns with vendors and ensure improvements are made

5 Track
Track progress against commitment

6 Audit and Certify
Support unannounced labor audits of vessels, farms, and processing facilities and seek certification or adhere to best practice guidance

7 Communicate with Consumers
Provide clear information to consumers regarding sourcing and sustainability

8 Engage
Participate in multi-stakeholder dialogues and support relevant policy to combat illegal fishing and human rights or labor abuses

9 Support Improvements
Consider supporting Fishery and Aquaculture Improvement Projects with social components or providing financial support to social initiatives

10 Share
Promote transparency and positive social stories

[6] FIshWise. https://www.fishwise.org/wp-content/uploads/2016/12/HRP_ShipsWheel_v6_wBLEED.pdf

Interpreting and Analyzing Data

While data collection is a critical step of a comprehensive sustainability program, data alone cannot detect where IUU fishing or human rights violations may be occurring. Once KDEs are collected, they require verification, interpretation, and analysis. Companies can then use the data in a variety of ways, including to:

- Ensure that products meet the company's sourcing policy;
- Prioritize products for a more in-depth review by conducting a risk assessment;
- Determine which products or supply chains require a comprehensive audit;
- Identify where further improvements may be needed and work with suppliers to develop a corrective action plan to address gaps.

Conclusion

A comprehensive sustainable seafood program requires a deep assessment of both environmental and social components of a company's supply chains. Given the links between IUU fishing and human rights abuses, it is best practice for companies to assess each area of risk by collecting and analyzing key information about products as they move through supply chains. Full-chain traceability helps companies comply with both environmental and human rights regulations, protect against reputational risk, satisfy customer demands, and take steps to prevent potential supply chain disruptions and revenue loss.

FishWise has teams of experts dedicated to helping businesses navigate all aspects of sustainable seafood. We offer a wide range of services for companies throughout seafood supply chains and work with them to develop a credible seafood program that is catered to their specific needs. Visit our services page to learn more.

For more information on improving traceability and human rights in seafood supply chains, please visit our resources page and download our traceability and social responsibility white papers.

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