



SSCI-GSSI Joint Development At-Sea Operations Scope V1 | Public Consultation Stakeholder Guidance

Start: 1 July 2020
End: 31 August 2020

1. Introduction

This document is meant for any interested stakeholder that wishes to review and/or provide comments on the draft SSCI At-Sea Operations (ASO) Framework. This document supplements the Framework documents by providing guidance on the process of the GSSI-SSCI Joint Development of the SSCI At-Sea Operations Scope.

The ASO scope covers all wild-catch activities that take place at sea, i.e. fishing/ harvesting, at-sea processing, transshipment and small-scale fisheries. All SSCI benchmark criteria will have to be met to achieve SSCI recognition.

Any part of the Framework that is not mentioned in this document, is not included in the scope of review. They will be identical to those in the published SSCI Manufacturing & Processing Scope, because no required adaptations were foreseen.

2. ASO Joint Development Process until Public Consultation

The draft Framework as presented for Public Consultation is the result of a review by a **Technical Working Group (TWG)**, consisting of CGF's Members and GSSI Partners. Over the past four months, the TWG has met via bi-weekly teleconferences to develop the draft ASO Scope.

The Technical Working Group members and their respective companies are as listed below.

Name	Surname	Company/Organisation
Prad	Kerdpaioj	Thai Union Group PCL
Stefanie	Moreland	Trident Seafoods
Ashton	Meier	Pacific Seafood
Mike	Kraft	Bumble Bee Seafoods
Ernesto	Godelman	CeDePesca
Anne	Vanderhoeven	Arctic Storm
Stephen	Fisher	Sea Delight
Sevaly	Sen	Fisheries Research and Development Corporation (Australia)
Axel Eyfjord	Fridriksson	Vignir G. Jonsson, a subsidiary of Brim
Yumie	Kawashima	Aeon
Elena	Finkbeiner	Conservation International

The TWG chose to work through an iterative process of development, using the SSCI Processing and Manufacturing Scope (published) as a starting point and adopting, amending and adjusting to create a fit for purpose scope to cover at-sea operations.

Although the focus of the TWG work was on the development of Part 3 on Social Criteria, they also needed to review Part 2 on Scheme Management and update the Glossary (Part 4) to ensure alignment with the ASO scope. This has resulted in some minor adaptation in the latter two parts.

A brief summary of the general approach by the TWG and of the review per Section is provided in the following paragraphs.

2.1. Approach by TWG

The TWG put considerable effort into agreeing on the primary approach for the scope. In particular, they aimed for a scope that was:

- **Comprehensive:** Provide enough good information to allow the supply chain/companies to make clear decisions based on a robust audit covering a comprehensive set of useful and understandable criteria. The criteria simply cannot cover every issue that might arise but all high risk areas must be addressed.
- **Inclusive:** The TWG adopted the approach of the FAO, aiming to address fisheries with a single set of criteria, including small-scale and artisanal fisheries. The TWG felt there was greater strength and protection for workers across the board if expectations of outcomes were consistent. Most importantly, they wanted to avoid a benchmark that had two sets of criteria (e.g. large scale and small scale fisheries) or couldn't be realistically achieved by some operators (e.g. artisanal vessels).

- **Objective:** The benchmark takes an objective rather than exceptions approach to limits (particularly with respect to hours). The TWG felt that the role of the benchmark in terms of limits was to ensure the supply chain had visibility into the operations and how worker protections were met. If the benchmark set limits, it would (by pure necessity within the seafood industry) also have to create allowances for not meeting certain limits. In the end, they did not feel the workers or supply chain would benefit from a system where everything would 'live by exception'. The objective approach is strengthened by the other fundamental components (most specifically worker empowerment and transparency).
- **Driven by worker empowerment:** By focusing on worker knowledge, understanding and the ability to take action (rather than the activity of the vessel), the criteria can accommodate a wide variety of operations and approaches across fleets. This allows for a benchmark that recognises the power of worker voice and the need for flexibility to the diversity of at-sea operations.
- **Transparent:** There is a focus on increasing transparency rather than prescriptive measures (for example in what level of documentation and evidence is required). In ensuring opportunity for supply chain partners to make informed choices, the TWG focused on the baseline expectations. This leaves room for schemes and other interested parties to tailor accordingly without compromising the integrity of the benchmark.
- **Open:** The TWG sought to avoid inadvertently driving down legal selectability and/or personal choice. There were several instances where the TWG felt that if they set operational limits to protect vulnerable workers, they would simultaneously punish or remove opportunities within fair, legal and freely chosen employment. Because of the inclusive approach, the TWG sought to find ways to protect both.

2.2. Social Criteria (Part 3)

The TWG began by agreeing on the coverage, overall approach and key topics that needed to be addressed in the ASO scope. They then worked their way through each Chapter of the Processing and Manufacturing Scope; desktop review, TWG discussion, revision, further discussion and finalisation. The TWG then took the full suite of criteria and reviewed them as a collective (ie. 'do they work together like we planned?').

Many of the fundamental components of human rights persist regardless of activity. In some cases, criteria from Processing and Manufacturing appear verbatim within the ASO Scope.

As was expected, the majority of changes reflect the operational aspects of vessels (from size and duration of voyage to health and safety when surrounded by water). However, the ASO scope is also unique in that it needed to find criteria appropriate for schemes that are likely to audit in non-operational circumstances (e.g. shore based audits).

In order to provide enough robustness to that approach, the TWG felt it was important to develop a scope that is strong and applicable not just as individual criteria, but as a collective suite. The checks and balances between Chapters provides essential robustness. For example, if one criteria in Chapter A were removed, it may have consequences for criteria in Chapters B & C.

2.3. Scheme Management Criteria (Part 2)

The requirements in Part 2 are intended to apply in full to all scopes assessed against the SSCI benchmark. However, due to the known complexities of as-sea operations, SSCI had requested the TWG to review and determine whether any changes were fundamentally necessary.

Some minor changes were identified (see "*ASO Draft SM Criteria_V1*").

2.4. Glossary (Part 4)

Where possible, the TWG sought to use terms consistent with the Processing and Manufacturing Scope Glossary. The attached glossary lists new/revised terms and terms not applicable under the ASO scope (see "*ASO Draft Glossary_V1*").

Glossary terms are referenced from normative documents as much as possible.

3. Normative References

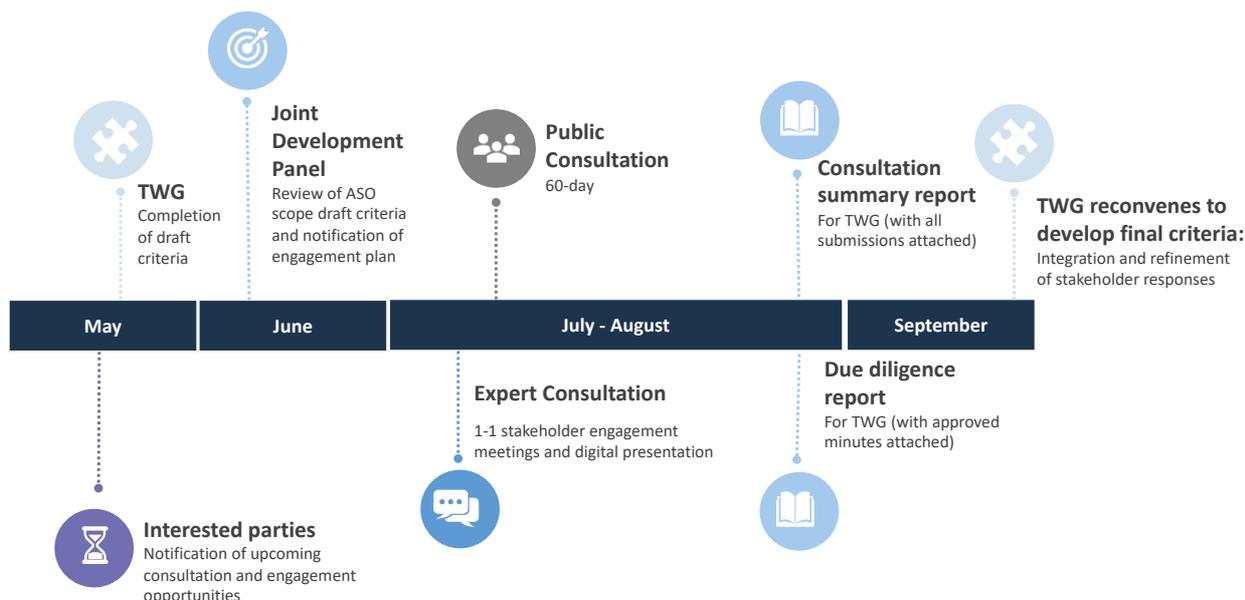
The SSCI Social Criteria are informed by international reference frameworks such as principles from relevant ILO Conventions, the 1998 Declaration on Fundamental Principles and Rights at Work, the UN Guiding Principles on Business and Human Rights and the CGF Priority Industry Principles on Forced Labour.

Most notably, the ASO scope takes a leading approach from the FAO Guidance on Social Responsibility in Fisheries and Aquaculture Value Chains and incorporates technical elements of ILO C188 - Work in Fishing Convention, 2007 (No. 188).

A full list of references is provided with the draft criteria (see “ASO Draft References_V1”).

4. Public Consultation & final ASO Framework

4.1. Complete Timeline for ASO Scope Development



4.2. Public Consultation

Consistent with other SSCI scopes, the ASO scope is published for a 60-day public consultation. Any stakeholder can share their comments in writing, by filling out the provided template on the [SSCI Website](#).

The Public Consultation was launched on July 1st and will close on August 31st COB. During this period, the draft ASO Framework will be published for review. Stakeholders can provide overarching comments or criteria specific comments. The draft Framework is presented in the following documents:

1. Scheme Management Criteria (Part 2), overview of changes for ASO Scope compared to the Manufacturing & Processing Scope;
2. Social Criteria (Part 3), complete overview of criteria in 12 chapters;
3. Glossary (part 4), overview of changes for ASO Scope compared to the Manufacturing & Processing Scope (Published).

Please note that any part of the Framework that is not mentioned above, was not included in the scope of review of the TWG. These parts will be identical to those in the SSCI Manufacturing & Processing Scope (published).

In addition to the draft Framework documents, this Stakeholder Guidance document and a list of references are provided for information purposes.

If you have completed your review, please provide your input by filling out the provided template on the [SSCI Website](#).