



SSCI-GSSI Joint Development At-Sea Operations Scope | Public Consultation 2 Stakeholder Guidance

Start: 13 January 2021

End: 12 February 2021

Introduction

This document is meant for any interested stakeholder that wishes to review and/or provide comments on the second 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.

SSCI and GSSI have been collaborating since 2018. Since early 2020, the collaboration focused on the joint development of the two scopes of their benchmark tool, that will apply to seafood production: the At-Sea Operations Scope and the Primary Production Scope. The GSSI and SSCI benchmark tools have the same value proposition: providing the industry with access to a list of credible and robust auditing and certification programmes. By joining forces, GSSI and SSCI aim to have a greater impact within the industry and to align environmental, social and food safety benchmarks for independent third-party schemes. This, in turn, is going to help drive market alignment on sustainable seafood production and sourcing worldwide.

The At-Sea Operations scope covers all wild-catch activities that take place at sea, i.e., fishing/ harvesting, at-sea processing, transshipment and small-scale fisheries. fishing/ harvesting, at-sea processing, transshipment, and small-scale fisheries. All SSCI benchmark criteria must 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.

Sustainable Supply Chain Initiative

The Sustainable Supply Chain Initiative (SSCI) provides buyers and suppliers with clear guidance on which third-party auditing and certification schemes cover key sustainability requirements and apply relevant governance and verification practices. By demonstrating alignment with the SSCI criteria and achieving SSCI recognition, scheme owners signal a strong commitment to raising the bar while driving harmonisation and alignment. While the decision to accept individual suppliers and schemes remains at the company level, SSCI helps to reduce duplicative, parallel work by companies to assess sustainability standards and provides a transparent reference for third-party audit protocols and certification programmes.

The current SSCI benchmarking process focusses on social sustainability topics such as child labour, forced labour, wages, working hours, and other related topics. Relevant third-party schemes can currently apply for recognition under the Manufacturing & Processing scope to be followed by the subsequent At-Sea Operations and Primary Production scopes.

Global Seafood Sustainable Initiative

As the public-private partnership on seafood sustainability with 90+ stakeholders industry-wide, GSSI aligns global efforts and resources to address the latest seafood sustainability challenges. Governed by a Steering Board representing the full seafood value chain, companies, NGOs, governments and international organizations – including the FAO –, GSSI promotes sector-wide collaboration to drive forward more sustainable seafood for everyone.

1. GSSI-SSCI Joint Development Process

The draft Framework as presented for Public Consultation is the result of two rounds of reviews by a **Technical Working Group (TWG)**, consisting of CGF's Members and GSSI Partners. Since March 2020, the TWG has met via bi-weekly teleconferences to develop the draft ASO Scope. The first round took place from February until May 2020. A second round of review from October until December 2020 followed the first Public Consultation (60-day). During this second round of review, the public comments were considered and the framework was amended by the TWG.

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

Name	Surname	Company/Organization	Location
Mariana	Toussaint	UN Food and Agricultural Organization (FAO)	Global
Stefanie	Moreland	Trident Seafoods	United States
Ashton	Meier	Pacific Seafood	United States
Mike	Kraft	Bumble Bee Seafoods	United States
Ernesto	Godelman	CeDePesca	Argentina
Anne	Vanderhoeven	Arctic Storm	United States
Stephen	Fisher	Sea Delight	United States / Vietnam
Sevaly	Sen	Fisheries Research and Development Corporation	Australia
Prad	Kerdpaioj	Thai Union Group PCL	Thailand
Yumie	Kawashima	Aeon	Japan
Elena	Finkbeiner	Conservation International	Global
Axel Eyfjord	Fridriksson	Vignir G. Jonsson, a subsidiary of Brim	Iceland
Niklas	Wehner	Aldi South	Germany
Rita	de Brito Martins	Jeronimo Martins	Portugal

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:

- **Normative references:** the criteria are underpinned by ILO Conventions and Recommendations, the UN Guiding Principles and aligned with the Consumer Good Forum's Priority Industry Principles on Forced Labor.
- **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 as much as possible 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. At-Sea Operations Framework

The structure of the SSCI Benchmark Tool is as follows:

Part 1: Governance and Operational Management

Part 2: Scheme Management

Part 3: Social Criteria

Part 4: Glossary

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 Scheme Management Criteria (Part 2) 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 review per Section is provided in the following paragraphs.

Scheme Management (Part 2)

First TWG review (February-May 2020)

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 at-sea operations, SSCI had requested the TWG to review and determine whether any changes were fundamentally necessary. Some minor changes were identified during the first round of review, leading to the adjustment of 4 Scheme Management criteria. These criteria were presented during the first Public Consultation.

Second TWG review (October-December 2020)

During the second round of review by the TWG, it was determined no further changes would be required. This section is therefore not presented during this second Public Consultation.

Social Criteria (Part 3)

First TWG review (February-May 2020)

Early 2020, the TWG started their extensive review of the Social Criteria for the At-Sea Operations Scope. Using the existing Social Criteria from the Manufacturing and Processing Scope, 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.

Second TWG review (October-December 2020)

Following the first Public Consultation, several terms are revised (indicated in red) (see "SSCI ASO_Draft v2 Framework").

In line with comments received during the Public Consultation, the second round of review focused on the Freely Chosen Labour (3) and Occupational Health and Safety (10) chapters of the framework. Other important topics for review were related to documentation, small scale fisheries and overarching legal/policy implications.

Glossary (Part 4)

First TWG review (February-May 2020)

Where possible, the TWG sought to use terms consistent with the Processing and Manufacturing Scope Glossary. The glossary lists new/revised terms and terms not applicable under the ASO scope

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

Second TWG review (October-December 2020)

Following the first Public Consultation, several terms are revised (indicated **in red**) (see “SSCI ASO_Draft V2 Glossary”).

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).

The sources are referenced in the draft Social Criteria Framework. Additionally, a full list of references is provided (see “SSCI ASO_Draft v2 References”).

3. Public Consultation & final ASO Framework

Public Consultation 1 (July 1st - August 31st 2020)

From **July 1, 2020 to August 31, 2020**, SSCI and GSSI held a 60-day public consultation to review the draft of the At-Sea Operations Framework.

The organisations would like to thank all stakeholders who participated in the consultation. After receiving over 25 formal comments on the criteria and holding multiple stakeholder conversations, the work focussed on the integration of such feedback with the support of the Technical Working Group.

Public Consultation 2 (January 13th - February 12th 2020)

Between October and December 2020, the At-Sea Operations - Working Group has reviewed and integrated the input provided during the first Public Consultation. From January 13th, 2021 to 12th, 2021, SSCI and GSSI are holding a second public consultation to provide stakeholder the opportunity to review the changes made to the draft SSCI At-Sea Operations Framework.

We strongly encourage stakeholders to focus their comments on the changes that are presented. In case any questions arise on the changes, please share your enquiry with ssci@theconsumergoodsforum.com and secretariat@ourgssi.org.

Final framework

Following the second Public Consultation, the Technical Working Group will start their final review. A final draft framework will be presented to the GSSI and GCF Boards for approval. Once the framework is approved, response to stakeholder comments will be provided and the SSCI will launch the At-Sea Operations scope. This will allow for third-party social compliance certification schemes in the seafood industry to be benchmarked against SSCI criteria and receive SSCI recognition.

For more information on the SSCI recognition or the benchmark process, please share your enquiry with ssci@theconsumergoodsforum.com and/or secretariat@ourgssi.org.