



HUMAN RIGHTS AT SEA

Langstone Technology Park | Langstone Road | HAVANT | PO9 1SA | United Kingdom
www.humanrightsatsea.org | enquiries@humanrightsatsea.org

To Whom It May Concern,

A REVIEW OF THE INTERNATIONAL FISHERIES AND AQUACULTURE CERTIFICATIONS, STANDARDS AND RATINGS ECOSYSTEM QUESTIONNAIRE 1.0

“Human rights abuses are not just morally wrong; they are also bad for business.”

UN Human Rights Office of the High Commissioner 23 March 2015

Please see below, the questions Human Rights at Sea (HRAS) is seeking engagement with as part of its ongoing public reporting on the issues first raised in the HRAS [8 February report](#) **“Does it do What it Says on the Tin?”**

We would kindly ask you to **respond with 30 working days of receipt** concerning your organisation’s internal actions around explicit awareness of human and labour rights protections, reported incidents and related investigation and remediation activities taken to combat worker abuses within the seafood supply chain. Your response will be reviewed and publicly issued through our website.

Questions

1. How many cases of reported child labour, forced or compulsory labour have been reported to your organisation under your certification since inception, how reported and by whom?

One company was reported, during an audit carried out by SGS, violating human rights, the findings occurred during the auditing process. The company reported to keep fishermen on board for over a year without returning home.

<https://seafood.media/fis/techno/newtechno.asp?l=s&id=51030&ndb=1>

2. How many cases of human rights abuse have been reported to your organisation under your certification since inception, how reported and by whom?

One company was reported, during an audit carried out by SGS, violating human rights. The company declared on its own headed paper to keep fishermen on board for over a year without returning home.

<https://seafood.media/fis/techno/newtechno.asp?l=s&id=51030&ndb=1>

3. What is the structure, methodology and oversight mechanism(s) for your organisation’s internal investigation, findings and remediation processes involving reported cases for i)



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human rights abuses, ii) labour rights abuses and specifically, iii) child labour or iv) forced or compulsory labour abuses?

The World Sustainability Organization has its own internal Anti-Harassment and Discrimination Policy (attached), which includes procedures for the management of Non-Conformities.

Additionally, Friend of the Sea requirements in the Standards for certification of products from sustainable fisheries and aquaculture (As well as all other WSO's standards) include a section dedicated to Social Accountability.

Friend of the Sea Accreditation and Certification Procedure FOS0001 describes how to carry out the accreditation and certification and thus how to manage any possible NC found in the course of the audit.

https://friendofthesea.org/wp-content/uploads/10092019_FOTS_FOS-0001-ver.9.3.pdf

<https://friendofthesea.org/wp-content/uploads/FOS-Wild-Standard-v.4.pdf>

Friend of the Sea is a third-party certification, and audits are performed by independent Certification Bodies.

In case any NCs are found, in this instance related to human rights violations, they are reported in the Corrective action form, and the company, in order to get certified, shall rectify any NCs within a defined timeframe.

4 How many entities have you **suspended** for i) human rights abuses, ii) labour rights abuses and specifically, iii) child labour or iv) forced or compulsory labour abuses since inception?

4.1 What are the details of the suspension, for how long was the suspension upheld, were the perpetrators identified and are these details publicly available?

4.2 Please confirm public access and links.

One company wasn't approved for certification due to labour/human right violation. The company is not certified currently.

<https://seafood.media/fis/techno/newtechno.asp?l=s&id=51030&ndb=1>

5 How many suspended entities have been re-certified, under what circumstances were they allowed to reapply and on what basis were they re-assessed for certification?

None

6 How many entities have you **banned** for i) human rights abuses, ii) labour rights abuses and specifically, iii) child labour or iv) forced or compulsory labour abuses since inception?

6.2 What were the details of the ban, were the perpetrators identified and are these details publicly available?

6.3 Please confirm public access and links.

Company Dongwon was not certified because of human rights abuses (see above)



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Please provide your responses direct to: csrreview@humanrightsatsea.org and cc'd to enquiries@humanrightsatsea.org Email titling: 'FAO CSR Review 2023'.

Thank you for your engagement.

David Hammond

CEO

Human Rights at Sea

WORKING DEFINITIONS

'Child Labour': Work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. It refers to **work that:**

- **is mentally, physically, socially or morally dangerous and harmful to children;** and/or
- **interferes with their schooling** by depriving them of the opportunity to attend school; obliging them to leave school prematurely; or requiring them to attempt to combine school attendance with excessively long and heavy work.

Ref: <https://www.ilo.org/ipec/facts/lang--en/index.htm>

'Forced or Compulsory Labour': All work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily.

Ref: <https://www.ilo.org/global/topics/forced-labour/definition/lang--en/index.htm>

'Human Rights abuse': Acts and activities that contravene fundamental human rights.

'Labour Rights abuse': Acts and activities that contravene fundamental labour rights.