



Fishing Industry Association (PNG) Inc.

P.O. Box 1103, BOROKO 111, National Capital District, Papua New Guinea

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Website: www.fia-png.com

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Background

The Fishing Industry Association of Papua New Guinea was founded in 1991 under the PNG law. We are a vertically integrated tuna supply chain group from Fishing across unloading, processing, and export. In 2018, FIA PNG developed and committed to the Responsible Sourcing Policy – RSP based on four pillars to take care of the Ocean and the People depending on. The pillars are 1. Sustainability, 2. Social Responsibility and Crew Welfare (SR&CW), 3. Marine litter and Fishing gear (ML&FG), and Seafood Traceability.

FIA PNG is NOT a fisheries certification and not a Crew/Social accountability certification program either. However, we set up our due diligence process (RSP) as a prerequisite to provide assurance for the responsible sourcing of tuna for our tuna fleet members; we have an MoU and public requirements for compliance. Our RSP SR&CW includes 3rd party Certification Body (CB) assessment against criteria aligned with the [FISH standard for Crew](#) and the [Responsible Fishing Vessels Standard \(RFVS\)](#) based on the ILO [Convention 188](#), ILO [guidance 199](#). In addition, the Standard reflects the intent of the International Maritime [Organisation Torremolinos International Convention](#) for the Safety of Fishing Vessels, 1977 (as amended). It also incorporates elements from the IMO International Convention on Standards of Training, Certification and Watchkeeping for Fishing Vessel Personnel ([STCW-F](#)), the United Nations Universal Declaration of Human Rights ([UDHR](#)) as well as the [Geneva Declaration of Human Rights at Sea](#), which addresses some of the more general concerns that have been voiced in recent years by industry. In 2022 our tuna fleet became the first tuna fleet to open and publicly shared the Vessels Monitoring System VMS to Global Fishing Watch. Since 2018 we care about transparency and accountability in our operations, which is why we continuously report publicly our progress related to our RSP. Currently, FIA PNG is an affiliate member in the advisory role of [The Coalition for Fisheries Transparency](#).

Our due diligence process is based on an implemented management system that includes a) internal audits, b) second-party audits, and c) third-party audits; in addition to electronic and satellite monitoring by [Global Fishing Watch](#) and our [integrated Fisheries management system](#) (iFIMS). We only operate with [competent, experienced, and qualified social accountability auditors](#) for our audits (internal, second-party, and third-party)

We welcome this questionnaire as an opportunity to provide feedback to your initiative and also to continuously improve our RSP. Annually we assess our due diligence management system, and we take into account [stakeholders' comments](#).



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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?

None, our RSP is based on PNG labor regulations, for instant, the National Fisheries Authority requests each fishing vessel extend the Crew list (passport number, seaman book, etc) to obtain a fishing license, in addition, our FIA PNG team of qualified auditors go onboard in a regular basis (at least 4 times per year) and have interviews with Crew regarding the 3 mentioned topics and much more, we usually spend 1 day per fishing vessel auditing and highly based on Crew interviews. We have implemented a pre-embarking workshop that each company provides to inform about the RSP, and crew welfare onboard.

Finally, an independent third-party social accountability qualified auditor team come and audit randomly our fleet and interview Crew annually (FISH standard and RFVS standard see links). This is part of the RSP management system (due diligence which is based on Seafoodmatter labor tool that is a benchmark of more than 50 standards, regulations, and good practices) from internal audits, second-party audits and third-party audits, we have identified several Non-conformities (NC) regarding lack of payment description and make it public to WCPFC workshop and Tuna Bangkok conference 2022.

If we found an NC during our audits, we have tools in place to proceed based on an MoU with each fishing company member ([RSP policy and internal audit procedures](#)) and we shall inform our certification assessment body responsible for our certification FISH and RFVS. It is the same process if thir party auditors find an NC during the assessments.

In addition, We opened VMS and tracked per fishing vessel on a daily basis ([iFIMS](#)), and we are able to see the daily fishing activities of our fleet members. As a remark our Crew members have access to WIFI onboard offshore (at Sea and at the Port) and at any time (30% of our fleet) and 70% when they are on their way to the Port because of the WIFI service provider does not have the capacity for at Sea signal. Our fishing trips take in average 30 days (low risk) https://www.fia-png.com/files/ugd/872bdb_693c5ea8188d47749ccd03197574decd.pdf

https://www.fia-png.com/files/ugd/8d5db0_f86bc399c68640cdaeae0fb995734a7d.pdf



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

None, It is a no-go. We have a due diligence process implemented since 2018 to control that Human Rights are respected and the Geneva Declaration is part of our RSP. We are the ONLY fleet that opens the Vessel Monitoring System (VMS) that allow anyone in the world, to check where our fishing vessel are fishing, for how long, and what exactly they are doing. It is part of our transparency policy. We are fully aligned with the Environment Justice Foundation 10 principles of transparency https://www.fiapng.com/files/ugd/8d5db0_2fd775e7869942419e46546e67508f97.pdf Our level of transparency and accountability is recognized by NGOs like ILO where we are advisor in the development of Crew regulations for Fisheries <https://www.fia-png.com/post/labour-standards-on-fishing-vessels-regional-workshop> and the WCPFC where also we are an advisor in developing a CMM for Crew https://www.wcpfc.int/labour_standards

See the attachment of our Sustainability and CSR director sharing publicly and disclosing our findings or non-conformities and performance. This is done annually.

If non-conformities (NCs) are found by second-party audits are reported by the FIA PNG office complying with the RSP Policy V6.0; also the NC found by third-party auditors are reported to the CAB or discovered by the CAB during an audit. In both cases, we shall report to the certification program FISH and RFVS.

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

Audit conclusions, and detected Nonconformities (NCs) are based on three (3) sources of verifiable evidence: 1. Documentation review (legally verified), 2. Observation onboard a fishing vessel to observe working and living conditions, and 3. Interviews with Crew members.

Our Structure and mechanism include the description of NC major, minor, critical, and opportunities for improvement are described in our [FIA PNG internal audit procedure V1.0](#)

Our FIA PNG auditor team is [experienced, competent, and qualified to carry our Crew welfare and Social accountability audits in fisheries](#). We constantly attend training and workshop [to maintain our qualifications as auditors in this space](#). The FIA PNG RSP methodology and oversight combine several tools to monitor and assess Social responsibility and Crew Welfare.

Our Integrated Fisheries Management System, a real-time traceability platform collected more than 60 Key Data Elements (KDE) some of which are related to control



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comply with labor rights based on ILO 188, and FISH standards for Crew, Human rights based on ILO and the Geneva Declaration, also our fleet shall provide a complete working agreement with the rights of Crew (following ILO 188 work agreement guidance), that is revised and audited by our FIA PNG office. Our oversight mechanisms are auditable and accountable https://www.fia-png.com/files/ugd/872bdb_f4f24b6a9f134f3c8cf424867e5a75a0.pdf We constantly inform the crew about their rights (Human rights) decent working and living conditions. In our RSP V6.0 which is public and accessible for free (see the link above), you can see our remediation policy, internal investigation Root Cause Analysis (RCA) and (NC)

[https://www.fia-](https://www.fia-png.com/files/ugd/8d5db0_46cd40d9ce934c2bb9dd1a495241890c.pdf)

[png.com/files/ugd/8d5db0_46cd40d9ce934c2bb9dd1a495241890c.pdf](https://www.fia-png.com/files/ugd/8d5db0_46cd40d9ce934c2bb9dd1a495241890c.pdf)

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.

We are in full compliance with local and international law.

Until now, we have not detected a critical situation or major against human rights, labor rights, forced labor, child labor and related abuses.

In case we found it, we will remove the fishing vessel and/or fleet from our group ([FIA PNG internal audit procedure v1.0 and RSP Policy V6.0](#)), and we will report to the certification assessment body (CAB), they can (temporarily) suspend or (permanently) withdraw a certificate if it is determined that a certified entity no longer adheres to the applicable requirements and abuses are found.

We detected that recruitment agents are the ones not complying with the law and they were removed. This was informed publicly at the Bangkok tuna conference 2022, and also during our advisory meeting with the WCPFC - please see the link. Our fleet is audited annually by third-party auditors, and quarterly by second-party auditors, and our fleet report on a daily basis their fishing activities including working onboard to NFA and our fleet have opened VMS with Global Fishing Watch <https://globalfishingwatch.org/impacts/stories/papua-new-guinea-takes-bold-step-for-pacific-in-fisheries-transparency/> this goes beyond any assessment and certification.

Our members are in full compliance with Human Rights, and decent working and living conditions. We have a suspension procedure to be complied by our members, see our RSP Policy point 9,2 for details.

4.2, it is not applicable at this stage, however, this will be shared with the certification programs (FISH and RFVS) and the NFA.



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The [FIA PNG fishing vessel list](#), IMO number, legal links, and certification is publicly available on our website, where we also provide links to verify the legal status of [our tuna fleet members](#)

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?

It is not applicable. We have not detected during second-party and third-party audits any non-compliance. See our answer above (question # 4)

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?

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

6.2 Please confirm public access and links.

We follow the RSP V6.0 point 9, for removing (ban) any fishing vessel and/or fleet. This includes abuses against human rights and non-compliance against the RSP SR&CW, FISH standard, and RFVS certification programs.

[\(Taken from our public RSP policy V6.0\)](#)

“9.2 FIA PNG office also is entitled and has the right to remove fishing company members in case any of the following situations may raised.

-No complies with FIA PNG RSP policy and procedure including certifications requirements of MSC and FISH standard as well as the due diligent process for marine litter and fishing gear.

- If Majors NC are no addressed appropriately and within the timelines provided by the FIA PNG office, the fleet or member or fishing vessel shall be removed from the group to maintain the rigorous, robustness, and credibility of the FIA PNG RSP.

- Be found on an IUU or in non-compliance with the PNG law including shark finning, fishing on closure seasons, labour onboard abuses

-We will inform immediately within no more than 5 working days to CB of MSC fishery standard and FISH standard for Crew”

and we inform immediately FISH standard and RFVS certification programs in case we found any NC. This is part of the third-party certification requirements



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Reporting human abuses publicly

We would like to remark that we do report human and labor abuses:

- 1. Internally Crew members have direct access and are anonymous to report via the internet and several media pages.*
- 2. We have a grievance mechanism that Crew is aware of to report any abuse to the FIA PNG office, FISH standard, and RFVS standard*
- 3. We report annually against the SDG applicable on the United Nations website; our report or Ocean Action # 38702 - [public link](#)*
- 4. In case of abuse is found, we apply our RSP V6.0 requirements 9,2; and follow the FISH procedure to remove the fleet and report it to ILO - [public link](#)*
- 5. Our public [annual report](#)*

Marcelo Hidalgo

Sustainability and CSR Director of FIA PNG

On behalf of

Sylvester Pokajam

Chairman and President of FIA PNG