

*Mr Audun Lem
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Brussels / Madrid, 5 November 2020

Subject: Draft guidance on social responsibility in fish value chains delayed after pushback

Dear Mr Lem,

Governments approved the idea of voluntary guidance in 2017 at a meeting of the FAO Committee on Fisheries (COFI) Sub-Committee on Fish Trade. In 2018, countries, gave FAO an official mandate to create the guidance. In 2019, some non-EU governments, relaying their fishing fleets' concerns, questioned the voluntary nature of the guidance and/or the need for such document, especially since the International Labour Organization's C188 Work in Fishing Convention addresses conditions aboard fishing vessels.

FAO's Secretariat was therefore mandated to produce a scoping paper – which will be presented at the next COFI Sub-Committee on Fish Trade meeting in February 2021 – that will state the objectives of the guidance, and what should and should not be included for the consideration of countries.

The guidance was meant to provide social and safety voluntary standards for the millions of seafood workers around the globe by articulating core principles related to fair treatment, gender equity, child labour and workers' rights. Six appendices were planned to address specific subsectors of the seafood industry — aquaculture, industrial fishing, small-scale fishing, processing, distribution, and retail.

The EU social partners in the fisheries sector (Europêche, COGECA and ETF), together with the EU Long Distance Fleet Advisory Council (LDAC), appreciate the efforts made by FAO to address social responsibility across the seafood value chain. In light of the labour abuses that are occurring in many fisheries around the globe, particularly in developing countries, the undersigned organisations regret the delay originated by the pushback of some governments.

Both the LDAC and social partners encourage FAO to continue working in close collaboration with relevant UN bodies such as ILO and IMO, in order to avoid duplication of work, activities and resources. The signatories of this letter, recall the importance of producing a practical guide in simple language on how to implement the existing internationally-agreed social and safety standards. A user-friendly version of the guidance is therefore of essence to ensure that companies and workers around the globe, especially in the small-scale fisheries value chain, have simple, clear and easy access to the information in several languages. Otherwise, the guidance will be of little use to the sector.

The EU social partners in the fisheries sector and the LDAC welcome IMO, ILO, FAO for the joint publication “*Joining forces to shape the fishery sector of tomorrow*” which provide guidance to policy, decision-makers and other stakeholders in the fisheries, maritime, and labour sectors with a view to promote the ratification and implementation of the fisheries instruments. We truly believe that the primary goal of the international community should be the ratification and implementation of international fisheries instruments that promote the safety and good working conditions of fish workers, training, and responsible and safe fisheries value chain operations. For this purpose, the FAO guidelines should also lay down the principles and foundations to apply most of these standards in practice at business and fish workers level.

Even though public institutions must be the guarantors of fish workers' rights through clear legislation and enforcement mechanisms, some certifications schemes have started filling the gaps globally on social standards. Our member organizations believe that the guidance could play an additional important role, serving as a framework that could be used as a benchmarking tool for social standard schemes and certifiers and inform due diligence actions of companies. This would prevent the proliferation of social labels far from international standards, providing misleading claims to the consumer and address social responsibility issues that exist beyond social certification schemes.

For the foregoing reasons, there is an obvious need to adequately consult and collaborate with fisheries value chain associations, unions, NGOs and other stakeholders. Both the social partners and the LDAC would like to reiterate their readiness to participate in the revision process and to support and contribute to the work of FAO in the drafting of successful and tailor-made guidelines for the fishing sector. For this purpose, our representatives are willing to assist at any stage the FAO to perform these tasks. The stakeholders represented by our organisations are fully committed to achieve the aforementioned objectives and make progress on the social dimension of fisheries to ensure a true sustainability at global level.

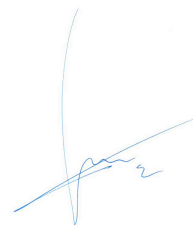
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