

# SSCI Benchmarking Assessment Report



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# 1. Application Information

## 1.1. Benchmark assessment team and date

Scheme Owner name(s)	Global Seafood Alliance Responsible Fishing Vessel Standard
Scheme Owner name and address	85 New Hampshire Avenue, Suite 200 Portsmouth, NH 03801 USA
Scheme Owner name, email, contact number	Global Seafood Alliance (GSA) 1-603-317-5000 <a href="mailto:mike.platt@globalseafood.org">mike.platt@globalseafood.org</a>
Date of previous application (if applicable)	N/A
Benchmark Leader name and contact details	Yogendra Chaudhry, <a href="mailto:y_chaudhry@yahoo.com">y_chaudhry@yahoo.com</a>
SSCI Technical Manager name	Erin Bush <a href="mailto:e.bush@theconsumergoodsforum.com">e.bush@theconsumergoodsforum.com</a>
Observers name	-
Interpreter's name (if applicable)	-
Language (e.g., English or other)	English

## 1.2 Benchmark assessment scopes

SSCI Scopes of Recognition		Scopes of Recognition Applied For
AI	Processing and Manufacturing	NO
BI	Primary Production	NO
CI	At-Sea Operations	YES

## 2. Executive Summary and Recommendations to the Steering Committee

The Responsible Fishing Vessel Standard (RFVS) is a voluntary, vessel-based program certifying high standards of operational practices relating to crew safety and welfare on board fishing vessels. The RFVS is owned and operated by Global Seafood Alliance (GSA) and is applicable to all types of commercially licenced fishing vessels, subject to them meeting the scope and eligibility criteria detailed in Responsible Fishing Vessel Standard. Global Seafood Alliance is an international, non-profit (501c 6) corporation registered in Delaware, USA with principal offices based in Portsmouth, New Hampshire.

SSCI started engagement with the Responsible Fishing Vessel Standard (RFVS) in June 2021. An introductory call between the RFVS team and the Benchmark Leader (BL) was organized during mid-June to discuss the Standard and the benchmarking process.

RFVS submitted the self-assessment in August 2021. The SSCI self-assessment was completed between August and October 2021 through a series of reviews and video conferences between the Scheme Owner (SO) and the BL. Significant non-alignments were noted, at the initial stage of the self-assessment and desktop review. SO submitted the updated version along with additional documentation in October 2021. Based on the nature of findings/feedback, and the updates on the SO's documentation, it was determined that an Office Visit will provide a better opportunity to go through the BL's findings and RFVS' alignment in light of the additional documentation submitted by the SO.

In-person office visit was conducted on November 15-16, 2021, at GSA office in Portsmouth, New Hampshire. The key objective was to go through all findings and cases of non-alignment to assess the RFVS conformance/alignment with the SSCI requirements. The office visit also provided a first-hand overview of the RFVS' governance process and application of RFVS requirements through the audit firms and their control by the Scheme Owner (SO). Both SSCI scheme management and social Criteria were thoroughly discussed.

RFVS works with ISO/IEC ISO 17065 accredited auditing bodies who are required to get an extension of their ISO 17065 scope to include GSA RFVS. The current auditing firms approved by the SO include LR, NSF, SGS, Control Union and ESTS. During the office visit random audit reports were chosen as samples to assess the consistent implementation of RFVS in the vessel auditing and certification. During the two days of office visit, more than 10 audit reports for different size and scale of vessels were reviewed. The review of audit reports and related documentation including the training material and auditor qualification program allowed SSCI to gain sufficient insights on RFVS application and scheme governance as well as the performance of the audit firms. Sufficient time was allocated to assess the scheme management and social criteria.

The review of scheme governance process, audits results, reports, and audit documents during the office visit and the supporting documentation furnished by the RFVS team after

the site visit provides evidence that RFVS is committed to align its social requirements with SSCI by either making changes in their requirements or providing sufficient guidance to the users on the interpretation/implementation of RFVS requirements. Further, GSA policies, procedures, and performance are strong to ensure a fair and well-founded assessment of a vessel to detect any non-conformities (NC) and issuing certificates only when conformity with the standard has been established.

Based on the findings and discussions during the office visit, RFVS has made significant changes in the standard and included several new clauses in its requirements to get aligned with SSCI. In addition, additional explanations in the guidance documents have been included to address some of the non-alignment issues. In light of the changes and additional requirements, it is recommended to monitor these changes and future audits/vessel certifications through ‘continued alignment assessment’. The annual monitoring may focus on some of the criteria which are either new or were deemed to be important (risk-based approach) for monitoring the continued alignment.

## 2.1. Result of the self-assessment review and the office visits

The results of the self-assessment were discussed during the office visit on November 15-16, 2021. Relevant documents on both scheme management and social criteria were provided by the scheme owner and included in the evaluation. During the initial (first) desktop review by the BL, a significant number of criteria were assessed as not aligned, as the RFVS requirements did not appear to cover many of the key SSCI criteria. During the subsequent review of the additional information and justifications submitted by GSA/RFVS, it agreed to carry out the assessment in person at GSA’s office as that will provide an opportunity to do a thorough and in-depth review of how RFVS is applied during the vessel audit. Based on the findings of the office visit, GSA RFVS agreed to review and revise the RFVS to include additional clauses and requirements in the standard to align fully with the SSCI requirements. The key findings from the self-assessment and office visit are presented below:

### **Scheme Owner Governance, Organisational chart, scope, objectives, integrity program:**

GSA is the owner of the RFVS program and the operations and management of GSA and RFVS are independent of the auditing and certification operations. All Certification Bodies are independent bodies who verify compliance to the RFVS standard. GSA is a legal entity registered in New Hampshire, USA and incorporated in the State of Delaware. GSA is a well-structured organization with documented Bylaws/Terms of Reference, Org Chart and other governance procedures including Conflict of Interest Policy that describes election process, membership, governance, finances, organisational structure, decision making process, key personnel roles and conflicts of interest.

GSA has a clearly defined system for the approval, suspension and withdrawal of audit services by audit firms for the scope of RFVS.

### **Appeal and complaints procedures**

GSA has a well-defined and documented appeals and complaints procedure which is freely downloadable from the BSP website. The procedure aligns with SSCI requirements

### **Relations with audit firms and accreditation bodies (AB)**

GSA RFVS requires accreditation by a recognized AB to ISO/IEC 17065 as a pre-requisite for any CB to apply for recognition. Once a CB has been approved for listing by BSP, that CB is required to seek an extension to scope of their ISO/IEC 17065 accreditation to include the GSA RFVS. The CBs are put on a “Restricted CB Approval List” until each specific extension of accreditation scope has been achieved. The current list of CBs authorised to do RFVS audits include LR, NSF, SGS, Control Union and ESTS.

### **Audit Outcome, certification:**

Over 10 audit reports were randomly selected to review during the office visit. The selected audit reports included vessels of different sizes as well as audits conducted by different CBs. Audit reports, auditing methodology, auditor qualification, technical review and audit witnessing were evaluated and discussed. The submitted audit reports were well-structured and complete. The quality of audit reports were mostly consistent and covered the whole range of issues required by the SSCI criteria.

Key issues during the audit process including sampling of worker’s interviews, anonymity, reporting, review of reports before certification, knowledge of labour conventions and local labour laws (etc.) are dealt with in line with the SSCI requirements. Based on the sample (audit reports) reviewed during the office visit, it appeared that the three audit firms are qualified and consistent in their auditing process. Competence and experience of auditors were well documented.

### **Observation and Recommendations:**

While the SSCI requires that the audit is conducted when the employment site is in normal operation, the GSA RFVS audits are not carried out during the normal operations when the vessel is out at sea. GSA RFVS audits are conducted at port as depending on the size of vessels and crew the vessel may be out at sea for anything between 24 hours to 30 days or beyond.

In terms of social requirements, GSA RFVS addresses some of the key requirements like working hours, mandatory rest periods including some of the social and OHS requirements through application of risk assessment. Such an approach may have a risk of legal noncompliance in certain jurisdictions where the local law explicitly defines these requirements. It is recommended that all such requirements are consistently monitored by SSCI through annual monitoring for their effective alignment with SSCI.

### **Data Management**

All reports, collected documents and important information such as records of audit

firms (CBs), audit reports, auditor qualification and training records, etc. are stored online. The current data management was found to be effective as all documents including randomly selected reports were made readily available throughout the two days of office visit.

**General impressions after office visit**

Based on the reviews conducted during the office visit, the scheme governance and social requirements appear to be aligned. GSA has incorporated additional requirements in RFVS to get aligned with SSCI where certain gaps were found in the RFVS requirements. However, to ensure continued and consistent alignment a risk-based annual surveillance by SSCI must include review of some of the criteria that are addressed through risk assessment (e.g. working hours, rest periods, disciplinary actions, etc.)

**2.2. Result of the public consultation**

Public consultation pending

**2.3. Recommendation to the SSCI Steering Committee**

TBC

## 3. Results of Assessment and Office Visit

### 3.1. Time and location details

	Location	People present (e.g. SSCI, consultant, Scheme Owner. Names and roles)	Date and time
<b>Self-assessment desktop review</b>	Discussed in two meetings after an exchange of documents	<b>GSA Team:</b> Mike Platt; Greg Brown; Katy Hladki; David Dietz; David Yunker; Avery Siciliano. <b>SSCI Team:</b> Thomas Vanhaaren; Erin Bush <b>BL:</b> Yogendra Chaudhry	Between September 2021 and October 2021
<b>Feedback calls</b>	Online	<b>GSA Team:</b> Mike Platt; Greg Brown; Katy Hladki; David Dietz; David Yunker; Avery Siciliano. <b>SSCI Team:</b> Thomas Vanhaaren; Erin Bush <b>BL:</b> Yogendra Chaudhry	Between September 2021 and October 2021
<b>Office visits</b>	In person office visit	<b>GSA Team:</b> Mike Platt; Greg Brown; Katy Hladki; David Dietz; David Yunker; Avery Siciliano. <b>SSCI Team:</b> Thomas Vanhaaren; Erin Bush <b>BL:</b> Yogendra Chaudhry	2021/11/15 2021/11/16

### 3.2. Overview

The Benchmarking process started in June 2021 after the initial workplan was submitted by the BL. GSA completed the initial self-assessment by August 2021 and the activities/process went along as defined by SSCI procedures.

GSA RFVS has established a well-defined and documented system for scheme governance, standards development and management of audits and audit firms.

In the course of the two Desktop Reviews followed by office visit a detailed and comprehensive review was carried out to assess the alignment with SSCI requirements

Based on the desktop and in person reviews, documents review and interviews with the GSA team as well as the subsequent revisions in the RFVS to incorporate additional requirements, RFVS is in alignment with the SSCI criteria.



## 4.0 General compliance, strengths and weaknesses

GSA RFVS has a robust scheme governance system in place. The organization structure and governance program is well defined, documented and is consistent with the industry best practices.

The GSA RFVS team is highly qualified and has an effective document control and data management program.

The program demonstrated a strong commitment to align with SSCI requirements throughout the benchmarking process. The SO was open and transparent in discussions and reviewing any gaps in the scheme. All identified gaps were promptly responded through additional documentation and changes in the guidance documents as well as the Standard

Based on the outcomes of office visit, GSA RFVS was prompt in introducing and including additional requirements in the standard to align with the SSCI requirements. A number of vessel audits have been conducted and in general most of the audits were found to be consistent and good quality.

The CBs are required to be accredited and extend their accreditation scope to include RFVS. This enhances the credibility as well as strengthens the auditing firms' processes for conducting the RFVS audits.

During the subsequent annual continuous alignment monitoring, SSCI shall focus on criteria that are addressed through risk assessment, legal compliance and auditor training and qualification

As the standard has been revised, SSCI shall monitor how these changes have been communicated to the CBs and how the auditor qualification have been addressed

### 4.1. Changes made to the Scheme following the benchmarking assessment

Based on the Benchmarking process and BL's findings, GSA RFVS has revised and released the Version-02 of the Standard and Compliance Guide. The Version-02 was released on 22 June 2022 and is available in the public domain. The revised version of the standard includes additional requirements and compliance guidance for better alignment with the SSCI criteria. Below is a list of new clauses that GSA RFVS that were included in the new version of the standard:

#### **New requirements/clauses into RFVS:V-02 program:**

- 1.2.2 – New clause that explicitly restricts falsification of records
- 2.4.3/2.4.3.1/2.4.3.2 – Three new clauses that provide guidance on the acceptable forms of voluntary prison labor.

- 2.9.1 – New clause that restricts any loans to crew members
- 2.13.2 – New clause that provides further guidance on how crew wages should be paid.
- 2.17.1 – New clause that requires records of all disciplinary action be maintained.
- 2.18.2 – New clause that stipulates requirements when changes to crew contracts occur.
- 2.26.1 - New clause that forbids any forced, bonded, trafficked or involuntary prison labor.
- 2.27 - Requires vessel operators to notify workers of their right to collective bargaining
- 2.27.1/2.27.2 - New clauses that provide further detail on the rights to collective bargaining onboard

In addition to the above new clauses GSA has revised the RFVS compliance guide. The additional changes include guidance for the auditors and amendments to some clauses to enable them to fully align with the SSCI requirements.

## 4.2. List of findings – Self-assessment and office visit

### BL's Note:

Based on the initial self-assessment findings and Benchmark Leader's desktop review, RFVS had provided additional information and supporting documentation that was followed by an office visit. Based on the office visit findings, RFVS has made significant changes in the Standard to include additional requirements to align with SSCI requirements. In addition, changes have been incorporated in the Compliance Guide to incorporate additional requirements through guidance and consistent implementation that further supports the alignment of RFVS with SSCI requirements.

The version-02 of the Standard and Compliance Guide was released on 22 June 2022 and the documents are available in public domain. The additional criteria/clauses and the compliance notes for the auditor guidance has helped the RFVS align its requirements closely with the SSCI criteria.

The RFVS requirements that are not FULLY ALIGNED with SSCI criteria are presented below:

### Part-II: Requirements for Management of Schemes

Chapter / Criterion No.	SSCI Benchmarking Criteria	Alignment	BL Note
Auditor Competence <b>B3-02</b>	The lead auditor performing audits for the audit firm shall have the following experience: - a minimum of 1-year experience in social compliance auditing and a minimum of 100 social compliance audit days OR - a minimum of 2 years experience in any other type of auditing and 150 audit days of which a minimum of 50 are social compliance audit days. Other audit days may include management system, health and safety, labor inspections, investigations, audit components. OR	Partly Aligned	SSCI is reviewing and updating this criterion. Once the SSCI criterion is revised, RFVS requirements may get fully aligned with the SSCI criteria

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	- a detailed combination of minimum relevant experience in social compliance, trainings, and social compliance audit days that are publicly available and consistent with standard industry practices & norms		
Audit Protocol <b>B4-06</b>	The audit shall take place during a period when the employment site is in normal operation. Resulting variations to audit frequency shall be clearly defined and documented.	Partly Aligned	RFVS audits are conducted at port when all the workers may not be available at the fishing vessel. Hence, this criterion is graded as Partly Aligned.

### Part-III: Social Compliance – At Sea Operations

Chapter / Criterion No.	SSCI Benchmarking Criteria	Alignment	BL Note
Minimum Age <b>4.03</b>	The scheme shall require that details on any workers under the age of 16 years that are identified during the audit to be working on the fishing vessel are reported in the audit or assessment report. This shall include but not be limited to the nature of work being carried out by any such worker on the fishing vessel.	Partly Aligned	This criterion is graded as Partly Aligned as RFVS criterion does not include requirements related to reporting of under 16 workers through audit and assessment report
OHS <b>10.05</b>	The standard shall require that if transport to or from the fishing vessel while at sea is provided by the entity, the vessel (including motherships and carrier vessels) used for the transport are fit for purpose.	NOT APPLICABLE	There are no equivalent RFVS requirements. RFVS indicated that this requirement is out of scope for RFVS as it is considering additional standards for tender/support vessels
Business Ethics <b>12.01</b>	The standard shall require that the entity does not engage in any act of corruption, extortion, embezzlement, nor in any form of bribery - either directly or indirectly.	Partly Aligned	This requirement is addressed by RFVS through its eligibility criteria. Since there are no clauses/auditable requirements this criterion is not graded as Fully Aligned

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SSCI Benchmarking Requirements Part	Criterion Number, Chapter	Non-conformity	Partly / no	Action from Scheme Owner	Recommendation from Benchmark leader	Decision from SSCI Manager
N/A						

## 5. Results of the Public Stakeholder Consultation

### 5.1 Executive summary

The public consultation was held between 26 September and 25 October, 2022, on SSCI's dedicated website. The SSCI team received no comments during the process, and as a result, the report remained unchanged.

## 5.2. List of findings – public stakeholder consultation

Criterion Number, Chapter	List of issues raised	Answer from Scheme Owner	Recommendation from Benchmark leader	Decision from SSCI Manager