

SSCI Benchmarking Assessment Report



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1. Application Information

1.1. Benchmark assessment team and date

Scheme Owner name(s)	Fairness, Integrity, Safety and Health Standard for Crew Inc
Scheme Owner name and address	1544 Spring Hill Road #10763, McLean, VA 22102
Scheme Owner name, email, contact number	Fairness, Integrity, Safety and Health Standard for Crew Inc mikekraft@fishstandard.org
Date of previous application (if applicable)	N/A
Benchmark Leader name and contact details	Yogendra Chaudhry, y_chaudhry@yahoo.com
SSCI Technical Manager name	Luiza Reguse l.reguse@theconsumergoodsforum.com Iarina Radu i.radu.external@theconsumergoodsforum.com
Observers name	Luiza Reguse l.reguse@theconsumergoodsforum.com
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 Fairness, Integrity, Safety, and Health (FISH) Standard for Crew is a voluntary program designed to certify high standards of crew welfare, safety, and operational practices aboard fishing vessels. The FISH Standard is owned and managed by Fairness, Integrity, Safety and Health Standard for Crew Inc. and applies to all commercially licensed fishing vessels that meet the scope and eligibility criteria defined within the FISH Standard framework.

SSCI engagement with the FISH Standard began with the signing of the agreement on April 4, 2023. The initial self-assessment and desktop review were returned to the Scheme Owner (SO) on May 11, 2023. Following subsequent updates, clarifications, and revisions provided by the SO, a series of communications and evaluations took place throughout 2023 and 2024, including a call with the SO on June 5, 2023 and the submission of updated gradings on August 22, 2023.

A significant milestone was achieved with the office visit conducted on March 14-15, 2024, providing an in-depth review of FISH's governance processes, audit procedures, and implementation practices. The office visit allowed SSCI-BL to thoroughly assess FISH's alignment with SSCI's requirements, particularly concerning scheme governance and social criteria.

The office visit and subsequent findings submission on April 3, 2024 highlighted several areas of alignment, while also identifying corrective actions required to achieve full alignment on a number of Governance and Social criteria. FISH Standard representatives engaged constructively, leading to the submission of a Corrective Action Plan (CAP) on August 23, 2024, which addressed the findings and provided supporting evidence through detailed documentation.

Key Findings and Observations:

Governance and Compliance:

FISH Standard's governance structure and processes demonstrate a strong commitment to impartiality, independence, and integrity. Policies and procedures related to certification and audit activities will align with the SSCI requirements once the Corrective Actions are fully implemented

Audit and Certification Process:

Audits are conducted by accredited bodies, ensuring consistency and reliability in assessments. Based on the proposed Corrective Action Plan by FISH, the CBs are required to get accredited for FISH scope. Based on the CAP, FISH is currently working with the ABs for the accreditation of all CBs. Documentation and sample audit reports reviewed during the office visit support the robustness of FISH's audit processes.

Health, Safety, and Welfare Criteria:

Despite initial challenges related to vessel size and crew numbers, the Steering Committee's

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guidance allowed for these criteria to be evaluated fairly based on applicable regulations and industry standards (e.g., ILO, MLC).

Corrective Actions and Continuous Improvement:

The CAP submitted on August 23, 2024, addresses all identified non-conformities. The supporting documentation, including revised policies, procedures, and guidance frameworks, demonstrates FISH's commitment to continuous improvement and alignment with SSCI benchmarks.

Recommendations to the Steering Committee:

Approve/Accept the Corrective Action Plan (CAP):

Given the comprehensive nature of the CAP and the evidence provided, it is recommended that the Steering Committee approve the CAP, subject to SSCI's final review.

Monitor Implementation of Corrective Actions:

To ensure continued alignment, it is recommended that FISH Standard undergo annual monitoring assessments through MOCA process focusing on the newly introduced or revised criteria, particularly those related to health, safety, and emergency requirements as well as the updates on the Governance criteria.

Ongoing Stakeholder Engagement:

Encourage FISH Standard to maintain active engagement with stakeholders, including auditors and vessel operators, to ensure clear understanding and consistent application of the standard's requirements.

Continued Alignment Assessments:

Implement a risk-based approach to future assessments, prioritizing areas identified during the benchmarking process for closer scrutiny in subsequent audits and reviews.

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

The self-assessment review and subsequent office visit for the FISH Standard for Crew provided a comprehensive evaluation of the scheme's alignment with SSCI requirements. The process highlighted both strengths and areas requiring improvement.

The results of the self-assessment were discussed in detail during the office visit conducted on March 14-15, 2024. Relevant documents covering both scheme management and social criteria were provided by the Scheme Owner (FISH) and included in the evaluation process. During the initial desktop review, a number of criteria were assessed as not aligned or partially aligned due to gaps in formal agreements with Accreditation Bodies (ABs), accreditation of Certification Bodies (CBs), and requirements related to social criteria for crew welfare and safety. To facilitate a more thorough and in-depth review, an in-person office visit was arranged, providing an opportunity to closely evaluate the application of the FISH Standard during audits and scheme management processes.

Corrective Action Plan (CAP):

In response to the findings, FISH developed and submitted a CAP. The plan included revisions to policies, procedures, and the Standard (Version 1.2). Supporting evidence, such as updated MOUs, audit templates, and procedural documents, demonstrated FISH's commitment to achieving full alignment with SSCI requirements.

Based on the findings from the office visit and the subsequent CAP, the FISH team demonstrated a strong commitment to align with SSCI requirements by developing a detailed Corrective Action Plan (CAP). This plan included revisions to key documents and procedures, such as:

- **Scheme Management and Governance:**
FISH established a clear framework for governance, including updates to their Quality Management System (QMS), Policy on Independence and Liability, and procedures for CB approval and scheme monitoring and evaluation. The Memorandum of Understanding (MOU) with ANAB was finalized to ensure CBs achieve and maintain ISO/IEC 17065 accreditation.
- **Social Criteria:**
The FISH Standard (Version 1.2) was revised to address requirements related to recruitment fees, worker protections, and occupational health and safety. Updates were also made to the Auditor Guidance Manual to ensure consistent application of these criteria during audits.
- **Audit Processes:**
Enhanced procedures for handling non-conformities, including the requirement for root cause analysis and corrective action plans, were incorporated into the FISH Audit Report Template.

The self-assessment review and office visit concluded that, with the development of the CAP to address the SSCI findings. Once the proposed CAP is fully implemented, the FISH Standard for Crew is expected to fully align with SSCI requirements. The FISH team's proactive approach and transparency throughout the process underscore their commitment to maintaining high standards of fairness, integrity, safety, and health for crew members.

The following sections provide further details on some of the key SSCI requirements and FISH's alignment with those criteria

Appeal and complaints procedures

The FISH Standard for Crew has established a robust framework for Appeals and Complaints Procedures to ensure transparency, fairness, and accountability within the certification process. The requirements align with SSCI Criterion A1.05 and A3.02, which mandate that the Scheme Owner maintains a publicly available procedure for handling appeals and complaints, as well as integrity monitoring.

Specifically:

- FISH Procedure 2 clearly defines the steps for resolving complaints and appeals, ensuring stakeholders have an accessible and transparent process to raise concerns. This includes timelines for handling submissions and communicating outcomes.

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- The procedure ensures impartiality in reviewing complaints and appeals, which is critical to maintaining the integrity and credibility of the certification scheme. FISH's approach aligns with international best practices and relevant legal frameworks, ensuring consistency with SSCI's expectations.
- The procedure is publicly available on the FISH Standard website, demonstrating FISH's commitment to transparency.

Relations with audit firms and accreditation bodies (AB)

The FISH Standard for Crew maintains a strong and structured relationship with audit firms and accreditation bodies to ensure the integrity, impartiality, and reliability of the certification process. This relationship aligns closely with SSCI Criteria. Based on the current processes and CAP, FISH requires that all Certification Bodies (CBs) conducting audits are accredited to ISO/IEC 17065, ensuring they meet internationally recognized standards for competence and impartiality.

FISH has clearly defined procedures for approving and monitoring audit firms through Procedure 3 - CB Approval. These procedures outline the requirements CBs must meet, including qualification criteria for auditors, ongoing training, and performance evaluations. The relationship is further governed by framework clauses 1.3 and 4.1, which detail the contractual agreements and expectations for audit firms, ensuring alignment with FISH's quality management system.

Additionally, FISH collaborates with accreditation bodies to ensure that all CBs operate within a framework of impartiality and independence. This is supported by FISH's policy on Independence and Liability and ongoing integrity monitoring processes. These measures guarantee that certification decisions are made objectively, fostering trust and confidence in the FISH Standard's implementation and outcomes

Audit Outcome, certification:

The FISH Standard for Crew has procedures governing audit outcomes and certification, aligning with SSCI Criterion B5.01-B5.04. These procedures ensure that certification decisions are objective, transparent, and based on consistent audit results.

FISH's framework (Section 2.13, Annex 3) outlines the requirements for issuing certificates after an audit has verified full compliance with the standard. Certification Bodies (CBs) are required to issue certificates only when the audited entity has successfully met all necessary criteria, ensuring that the process is both rigorous and fair. This approach promotes integrity and maintains the credibility of the certification process. The FISH Standard also mandates that CBs provide clear and detailed audit reports, as specified in Framework Clause 2.11.4. These reports document the findings, non-conformities (if any), and the rationale behind certification decisions. Additionally, procedures for follow-up actions and corrective measures are well-defined, ensuring that any non-conformities identified during audits are addressed promptly and effectively.

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This structured approach to audit outcomes and certification underscores FISH's commitment to maintaining high standards of crew safety and welfare, ensuring transparency and trust in the certification process

Data Management

The FISH Standard for Crew maintains a robust approach to Data Management, ensuring that all data related to audits, certification, and scheme governance are managed securely, accurately, and in alignment with SSCI requirements. This aligns with SSCI Criterion B7.02, which mandates effective data management systems to ensure transparency, traceability, and confidentiality.

FISH's Quality Management System (QMS), specifically Section 10, outlines detailed procedures for Document Control and Data Management. These procedures ensure that data collected during audits and certification processes are securely stored, regularly updated, and accessible only to authorized personnel. The QMS also defines protocols for data retention, backup, and protection against loss or unauthorized access.

Additionally, Procedure 3 - CB Approval further supports data management by requiring Certification Bodies (CBs) to maintain accurate and up-to-date records of their audit activities. This includes documentation of audit findings, corrective actions, and certification outcomes. By adhering to these protocols, FISH ensures that all data is handled with the highest level of integrity, supporting transparency and confidence in the certification process.

Overall, FISH's commitment to comprehensive data management practices helps maintain the integrity of the scheme, supports effective decision-making, and ensures compliance with SSCI's requirements for data security and traceability

General impressions after the office visit

The office visit for the FISH Standard for Crew provided an opportunity to thoroughly assess the scheme's governance, operational processes, and alignment with SSCI requirements. Overall, the engagement demonstrated a high level of openness and cooperation from the FISH team. They actively participated in discussions, addressed concerns transparently, and were receptive to feedback provided throughout the benchmarking process.

During the office visit, the FISH team displayed a clear commitment to continual improvement and a genuine desire to meet SSCI's rigorous standards. Key areas such as Appeals and Complaints Procedures, Relationships with Audit Firms and Accreditation Bodies, Audit Outcome and Certification, and Data Management were thoroughly reviewed. The findings revealed that while the scheme had strong foundational processes, some gaps and areas for enhancement were identified. In each case, the FISH team was proactive in acknowledging these gaps and provided justifications or outlined plans for corrective action.

FISH’s commitment to implement a robust Corrective Action Plan (CAP) was particularly noteworthy. The proposed CAP addresses critical areas such as audit reporting, integrity monitoring, and scheme governance, with a focus on ensuring alignment with SSCI requirements. The supporting documentation provided, including updated policies, procedures, and framework clauses, indicates a well-structured approach to resolving the identified issues.

2.2. Result of the public consultation

Public consultation pending

2.3 Recommendation to the SSCI Steering Committee

The benchmarking process for the FISH Standard for Crew revealed significant progress and a strong commitment to aligning with SSCI requirements. The Scheme Owner has demonstrated transparency, cooperation, and a willingness to address non-conformities and partially aligned criteria through comprehensive Corrective Action Plans (CAPs). The following recommendations are based on the findings, corrective actions, and supporting evidence reviewed during the office visit and subsequent submissions.

Key Observations and Strengths:

Openness to Feedback and Continuous Improvement:

The FISH team exhibited a high level of openness during the office visit and subsequent reviews. They actively engaged with the Benchmark Leader's feedback and promptly developed corrective actions to close gaps identified in scheme management, social requirements, and accreditation processes.

Appropriate Corrective Action Plans (CAPs):

FISH developed well-documented CAPs addressing specific SSCI requirements related to:

- **Accreditation of Certification Bodies (CBs)** (B1.01 to B1.08) through formal MOUs with ANAB.
- **Audit Outcomes and Corrective Action Verification** (B6.03 and B6.04), ensuring clear procedures for documenting and following up on non-conformities.
- **Social Criteria Alignment** (e.g., recruitment fees, worker protections, and occupational health and safety) by revising indicators in the FISH Standard (Version 1.2) and updating associated auditor guidance.

Recommendations:

1. **Approval of the Corrective Action Plans (CAPs):**

The proposed CAPs effectively address the identified non-conformities and areas of partial alignment. It is recommended that the Steering Committee approves these CAPs, as they provide a clear path to full alignment with SSCI requirements.

2. **Ongoing Monitoring and Verification:**

While the CAPs are comprehensive, it is recommended that FISH undergo annual

monitoring during MOCA process to verify the effective implementation of these corrective actions. Particular attention should be given to:

- **Accreditation Processes:** Ensuring that the MOUs with ANAB are fully operational and that all CBs achieve ISO/IEC 17065 accreditation within the specified timelines.
 - **Audit Follow-ups:** Confirming that corrective actions for non-conformities are documented and verified during follow-up audits.
 - **Social Criteria Compliance:** Monitoring adherence to new requirements in Version 1.2 of the FISH Standard, especially those related to recruitment fees, worker protections, and occupational health and safety.
3. **Stakeholder Engagement:**
Encourage FISH to maintain active communication with stakeholders, including auditors, accreditation bodies, and vessel operators, to ensure ongoing clarity and consistent application of the standard’s requirements.
4. **Risk-Based Approach for Future Assessments:**
Focus future benchmarking and monitoring efforts on high-risk areas identified during the initial assessment, such as **worker protections, audit integrity, and accreditation processes.**

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
Self-assessment desktop review	Discussed through various online meetings after an exchange of documents	FISH Team: Mike Kraft, WES Toller. SSCI Team: Luiza Reguse BL: Yogendra Chaudhry	Between May 2023 and September 2023
Feedback calls	Online	FISH Team: Mike Kraft, WES Toller. SSCI Team: Luiza Reguse BL: Yogendra Chaudhry	Between August 2023 and October 2023
Office visits	In person office visit	FISH Team: Mike Kraft, WES Toller. SSCI Team: Luiza Reguse BL: Yogendra Chaudhry	March 14-15, 2024

3.2. Overview

- The Benchmarking process for the FISH Standard for Crew commenced in April 2023 following the signing of the agreement with SSCI. The FISH team completed the initial self-assessment by May 2023, and subsequent activities were conducted in accordance with SSCI procedures.
- FISH Standard for Crew has established a well-defined and documented system for scheme governance, relationships with audit firms and accreditation bodies, data management, and social criteria related to crew welfare, safety, and ethical practices.
- The benchmarking process involved two desktop reviews, followed by an office visit in March 2024, during which a detailed and comprehensive review was conducted to assess the scheme's alignment with SSCI requirements. This included document reviews, discussions with the FISH team, and evaluations of their procedures and policies.
- During the benchmarking process, several areas of non-alignment or partial alignment were identified. In response, the FISH team demonstrated a strong commitment to improvement by developing and implementing a robust Corrective Action Plan (CAP). This plan addressed key areas such as:
 - Accreditation of Certification Bodies (CBs) to ISO/IEC 17065 standards.
 - Establishing formal agreements with Accreditation Bodies (ABs) through Memorandums of Understanding (MOUs).
 - Enhancing audit processes, including procedures for documenting non-conformities and follow-up actions.
 - Revising the FISH Standard (Version 1.2) to align with social requirements related to worker protections, recruitment fees, occupational health and safety, and business ethics.
- Based on the desktop reviews, office visit, document evaluations, and the implementation of the CAP, the FISH Standard for Crew demonstrates alignment with SSCI criteria. The commitment to continual improvement and transparency by the FISH team ensures that the scheme continues to align with the SSCI requirements.

4.0 General compliance, strengths and weaknesses

- The FISH Standard for Crew has a robust scheme governance system in place. The organizational structure, governance policies, and procedures are well-defined, documented, and consistent with industry best practices, ensuring transparency, integrity, and impartiality.
- The FISH team is highly qualified and demonstrates a strong commitment to maintaining an effective document control and data management program. Their procedures for managing data related to audits, certification, and scheme operations ensure secure, accurate, and traceable records.

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- Throughout the benchmarking process, the FISH team exhibited openness and transparency. They were proactive in addressing identified gaps and demonstrated a strong commitment to aligning with SSCI requirements. All areas of non-alignment or partial alignment were promptly addressed through the submission of a comprehensive Corrective Action Plan (CAP), which included additional documentation, policy revisions, and updates to the Standard.
- The office visit and document reviews confirmed that FISH took a diligent approach to incorporating the feedback provided by the Benchmark Leader. The revisions made to the FISH Standard (Version 1.2) and the supporting guidance documents reflect a genuine effort to meet SSCI requirements, particularly in areas such as:
 - **Accreditation of Certification Bodies** (CBs) to ISO/IEC 17065 standards.
 - **Social requirements** related to crew welfare, recruitment fees, and occupational health and safety.
 - **Audit processes** for handling non-conformities and ensuring follow-up actions are documented and verified.
- The requirement for CBs to achieve and maintain ISO/IEC 17065 accreditation and the formal agreements with Accreditation Bodies (ABs) enhance the scheme's credibility and ensure the integrity of the audit process.
- Strengths of the FISH Standard include:
 - A clear and transparent governance framework.
 - Well-documented procedures for audit management, appeals, and complaints.
 - Commitment to continuous improvement and responsiveness to feedback.
 - A focus on data security and integrity through effective data management policies.
- **Weaknesses** identified during the benchmarking process were primarily related to the lack of formal agreements with accreditation bodies and the need for more comprehensive social criteria. These issues were effectively addressed through the proposed CAP and revisions to the Standard.
- Moving forward, during annual continuous alignment monitoring, SSCI should focus on:
 - The implementation and effectiveness of the Corrective Action Plan.
 - The consistency and quality of vessel audits conducted by accredited CBs.
 - How the revised social criteria are being applied in practice.
 - The training and qualification of auditors to ensure they are well-equipped to apply the updated requirements.

Overall, the FISH Standard for Crew has demonstrated a strong commitment to aligning with SSCI requirements, and with ongoing monitoring and stakeholder engagement, it is expected to maintain full alignment with the SSCI requirements

4.1. Changes made to the Scheme following the benchmarking assessment

Following the benchmarking assessment conducted by SSCI, the **FISH Standard for Crew** has undertaken significant changes to address the findings and ensure full alignment with SSCI requirements. The finalized **Corrective Action Plan (CAP)** submitted by FISH outlines these changes comprehensively, demonstrating the Scheme Owner's commitment to continuous improvement and adherence to best practices.

Key Changes Implemented

1. Scheme Management

Several updates were made to enhance governance, audit processes, and documentation, including:

- o **FISH Quality Management System (QMS)**: Revised and updated to reflect changes in scheme governance.
- o **Policy on Independence and Liability**: A new policy to ensure impartiality and manage conflicts of interest.
- o **Procedure 3 – CB Approval**: Revised to specify clear requirements for Certification Bodies (CBs) and their accreditation.
- o **Procedure 4 – Scheme Monitoring and Evaluation (M&E)**: Updated to strengthen the monitoring of CB performance, including follow-up on non-conformities and corrective actions.
- o **Procedure 5 – Document Control**: Updated to enhance the control and management of scheme-related documents.
- o **FISH Audit Report Template**: Revised to ensure all non-conformities include a root cause analysis and corrective action plan (CAP).
- o **Agreement Template between Scheme Owner and CB**: Developed to formalize and enforce the relationship with CBs.
- o **Memorandum of Understanding (MOU) with ANAB**: Progress on securing MOUs with Accreditation Bodies (ABs) to ensure CBs meet ISO/IEC 17065 standards.

2. Standard Guidance Framework

The FISH Standard and associated guidance documents were revised to incorporate the feedback from the benchmarking process:

- o FISH Standard Version 1.2: **Updated to address social criteria gaps, including worker protections, recruitment fees, and occupational health and safety.**
- o Auditor Guidance Version 1.2: **Revised to align with the updated Standard, ensuring auditors have clear instructions on applying the new requirements.**
- o Framework Version 1.1: **Updated to include governance and process changes.**

3. Stakeholder Communication

- o A **cover letter to stakeholders** explaining the changes in scheme documents was prepared to ensure transparency and awareness of the updates.

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

During the benchmarking process, which included a thorough self-assessment and an office visit, several findings were identified where the FISH Standard for Crew required improvements to align with SSCI requirements. The key findings can be categorized into the following areas:

1. Scheme Governance and Accreditation

- o Partial or non-alignment related to the formal accreditation of Certification Bodies (CBs) and the Memorandums of Understanding (MOUs) with Accreditation Bodies (ABs) (e.g., B1.01 to B1.08).
- o The need for enforceable agreements and documented procedures to ensure AB compliance with ISO/IEC 17011 and CB compliance with ISO/IEC 17065.

2. Audit Processes and Corrective Actions

- o Gaps in the documentation and verification of non-conformities and corrective action plans (e.g., B6.03 and B6.04).
- o Incomplete audit records and lack of consistent follow-up on non-conformities by CBs.

3. Social Requirements

- o Non-alignment with social criteria related to recruitment fees, worker protections, and occupational health and safety (e.g., SSCI Criteria 2.02, 3.09, 4.06, 6.06, 8.04, 10.01, 10.10, 11.01, and 11.02).
- o The need to revise the FISH Standard to ensure that protections apply across all vessel sizes and align with international labor standards.

4. Data Management and Transparency

- o Improvements required in data management procedures to ensure secure and transparent handling of certification data (e.g., B7.02).

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The Corrective Action Plan (CAP) submitted by FISH effectively addressed these findings through updates to policies, procedures, and the FISH Standard (Version 1.2). The implementation of these corrective actions will ensure that the scheme will align with SSCI requirements

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Part-III: Social Compliance – At Sea Operations

Social Criterion No.	SSCI Benchmarking Criteria	Alignment	Action Proposed/Taken by Scheme Owner for Full Alignment
2.02	The standard shall require that if applicable national legal requirements set a different level of adherence than set by the scheme, the scheme shall require that whichever affords the highest level of adherence for workers is audited against.	NO	<p>To ensure that SSCI benchmark criterion 2.02 is addressed as an auditable requirement of the FISH Standard for Crew, SO has introduced a new criterion into the standard. Under Criterion 1.8 - Business Ethics, Indicator 1.8.2 now explicitly addresses SSCI 2.02:</p> <p>1.8.2 The vessel owner/company shall commit to meeting all the requirements of this standard as well as applicable laws and regulations. Should a discrepancy between applicable laws and the FISH Standard them arise, the company shall meet the requirement which affords fishers a higher level of protection.</p> <p>The FISH Standard Oversight Committee (SOC) reviewed and provided technical guidance on the formulation of Criterion 1.8. The FISH Board approved the revisions as recommended by the SOC.</p>
3.09	The standard shall require that no fees for recruitment (either directly or indirectly, in whole or in part) be borne by applicants or workers; nor shall applicants or workers bear related costs that may lead to situations of forced or compulsory labour.	NO	<p>To better align the FISH Standard for Crew with SSCI benchmark criterion 3.09, SO has revised Criterion 1.6 - Fair Recruitment and Placement of Fishers. Indicator 1.6.2 was modified and a new Indicator 1.6.3 was introduced to make it clear that the Standard prohibits employers from making fishers pay recruitment fees (1.6.2), and further the Standard heavily restricts employers from making fishers pay any of the costs related to recruitment (1.6.3). To address the case of recruitment services, we made parallel changes to Indicator 1.6.6 regarding recruitment fees and recruitment-related costs. The associated auditor guidance was updated accordingly.</p> <p>The FISH SOC reviewed and provided technical guidance on the</p>

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			<p>formulation of the above noted revisions to the FISH Standard for Crew. The FISH Board approved revisions as recommended by the SOC.</p>
4.06	<p>The standard shall require that workers under 18 do not perform work at night or in hazardous conditions. The scheme may allow for exceptions of performing work at night if the specific nature of the duty performed will not have a detrimental impact on the worker's health or well-being.</p>	NO	<p>To better align the FISH Standard for Crew with SSCI benchmark criterion 4.06 prohibiting night work by young fishers, SO has revised Indicator 1.1.4. Indicator 1.1.4 now explicitly states, among other things, that "young fishers do not undertake night work or other tasks/functions that are harmful to their physical and mental health and wellbeing." Associated auditor guidance was updated and expanded to ensure that the revised requirements are auditable and to ensure that the Standard maintains its consistency with ILO C188.</p> <p>The FISH SOC reviewed and provided technical guidance on the formulation of the above noted revisions to the FISH Standard for Crew and associated auditor guidance. The FISH Board approved the revisions as recommended by the SOC.</p>
6.06	<p>The standard shall require that no deductions from remuneration are made as a disciplinary measure.</p>	NO	<p>To ensure that SSCI benchmark criterion 6.06 is addressed as an auditable requirement of the FISH Standard for Crew, SO introduced a new indicator into our standard. The new Indicator 1.4.4.1 explicitly sets out a prohibition on deductions from remuneration as a disciplinary action. In addition, SO has defined "disciplinary action" in the Glossary of Terms so that it aligns broadly with SSCI's definition. SO has developed auditor guidance to ensure the new indicator is auditable in practice.</p> <p>The FISH SOC reviewed and provided technical guidance on the formulation of the above noted revisions to the FISH Standard for Crew and associated auditor guidance. The FISH Board approved revisions as recommended by the SOC.</p>

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8.04	The standard shall require that records of all disciplinary actions are kept.	NO	<p>To better align the FISH Standard for Crew with SSCI benchmark criterion 8.04, SO revised Indicator 1.4.1.2 so that the requirement for keeping records of disciplinary actions shall apply across all vessel size categories.</p> <p>1.4.1.2 Records of all disciplinary actions shall be kept.</p> <p>The FISH SOC reviewed and provided technical guidance on the formulation of the above noted revision to the FISH Standard for Crew and associated auditor guidance. The FISH Board approved revisions as recommended by the SOC.</p>
10.01	The standard shall require that clear responsibility is assigned and operational procedures are in place for the development, implementation, performance and maintenance of the occupational health and safety management system and the achievement of the relevant occupational health and safety objectives.	NO	<p>To better align the FISH Standard for Crew with SSCI benchmark criterion 10.01, SO revised Indicator 3.2.3 so that the requirement to implement OSH procedures covering items a-e shall apply across all vessel size categories.</p> <p>3.2.3 OSH procedures shall be implemented covering at least the following areas: [the scope of coverage for items (a) to (e) is unchanged from version 1.1; not shown]</p> <p>The FISH SOC reviewed and provided technical guidance on the formulation of the above noted revision to the FISH Standard for Crew and associated auditor guidance. The FISH Board approved revisions as recommended by the SOC.</p>

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10.10	<p>The standard shall require onboard procedures for the prevention of accidents, injuries and diseases are in place, taking into account the specific hazards and risks on the fishing vessel concerned. Risk assessments in relation to fishing vessel activities shall be conducted as appropriate to detect and assess potential threats to the health and safety of workers and other personnel, and effective measures are taken to address the findings from the risk assessment.</p>	NO	<p>To better align the FISH Standard for Crew with SSCI benchmark criteria for OSH, SO revised Indicator 3.2.3 and 3.2.4 so that the OSH requirements shall apply across all vessel size categories.</p> <p>3.2.3 OSH procedures shall be implemented covering at least the following areas: (a) prevention of accidents, injuries and illness through review and management; (b) training of fishers in OSH fundamentals relevant to their operational assignments; (c) training of fishers in the relevant fishing operations and in the use of relevant fishing gear and processing equipment to include periods of supervised operation (i.e., on the job training); (d) reporting and investigating accidents on board the fishing vessel in accordance with applicable laws and regulations; and (e) actions to reduce or eliminate hazards which are specific to the vessel or fishing operations.</p> <p>3.2.4 Captain and fishers shall be given suitable guidance, training material, and related information in a language understandable to them on how to evaluate and manage health and safety risks on board the fishing vessel.</p> <p>Indicator 3.2.5 was deleted. Auditor guidance was updated accordingly.</p> <p>The FISH SOC reviewed and provided technical guidance on the formulation of the above noted revision to the FISH Standard for Crew and associated auditor guidance. The FISH Board approved revisions as recommended by the SOC.</p>
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10.12	<p>The standard shall require that in the event of a health and safety incident on board a fishing vessel:</p> <p>(a) the entity maintains written records, and</p> <p>(b) the cause of the incident is determined when it occurs,</p> <p>(c) appropriate corrective action is taken to prevent the recurrence of similar incidents.</p>	NO	<p>Addressed by revision of Indicator 3.2.3 and 3.2.4. See above response to SSCI 10.10</p>
11.01	<p>The standard shall require that appropriate emergency, fire safety, rescue, evacuation and survival procedures are in place.</p>	NO	<p>Addressed by revision of Indicator 3.2.3 and 3.2.4. See above response to SSCI 10.10</p>
11.02	<p>The standard shall require that all workers and other personnel are trained on the emergency, fire safety, rescue, evacuation and survival procedures, including exercises in emergency prevention, preparedness and response. Training is timely and repeated on a regular basis. It shall also be repeated for new and reassigned workers or other personnel and when changes in fishing vessel activities or equipment present new risks. Training is provided to workers or other personnel in an understandable manner.</p>	NO	<p>To better align the FISH Standard for Crew with SSCI benchmark criterion 11.02, SO revised Indicator 3.3.3 so that the training requirements contained therein shall apply across all vessel size categories (i.e., small and large vessels alike).</p> <p>The abovementioned change to Indicator 3.3.3 created a misalignment of the FISH Standard for Crew with IMO training requirements (STCW-F only applies to fishing vessels over 24 m) so SO introduced Indicator 3.3.4 which sets out requirements for Basic Safety Training (BST). Note: 3.3.4 partly reiterates the training requirements of 3.3.3. Associated auditor guidance for 3.3.3 and 3.3.4 was updated accordingly.</p> <p>The FISH SOC reviewed and provided technical guidance on the formulation of the above noted revision to the FISH Standard for Crew and associated auditor guidance. The FISH Board approved revisions as recommended by the SOC.</p>

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12.01	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.	NO	<p>To ensure that SSCI benchmark criterion 12.01 is addressed as an auditable requirement of the FISH Standard for Crew, SO introduced a new criterion into the standard. Under Criterion 1.8 - Business Ethics, Indicator 1.8.1a now explicitly sets out a prohibition on the engagement by the company/vessel owner in corruption, extortion, embezzlement, and bribery.</p> <p>The FISH SOC reviewed and provided technical guidance on the formulation of Criterion 1.8. The FISH Board approved these revisions as recommended by the SOC.</p>
12.02	The standard shall require that the entity does not falsify any information regarding their activities, structure and performance and is not involved in any act of misrepresentation in the supply chain.	NO	<p>To ensure that SSCI benchmark criterion 12.02 is addressed as an auditable requirement of the FISH Standard for Crew, SO introduced a new criterion into the standard. Under Criterion 1.8 - Business Ethics, Indicator 1.8.1b now explicitly sets out a prohibition on falsification by the company/vessel owner of information in respect of the scope of the operation and misrepresentation of information in the supply chain.</p> <p>The FISH SOC reviewed and provided technical guidance on the formulation of Criterion 1.8. The FISH Board approved the revisions as recommended by the SOC.</p>

5. Results of the Public Stakeholder Consultation

5.1. 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