



# Human Rights Due Diligence

Fundamentals for Impactful  
Implementation in Seafood

*A supplemental resource to RISE*





## About FishWise

FishWise works to sustain ocean ecosystems and the people who depend on them by transforming global seafood supply chains. Advancing private sector leadership, building and actively participating in multi-stakeholder collaborations, and strengthening governance reform and policy advocacy, FishWise implements a holistic approach to sustainability in pursuing its mission. For over 20 years, FishWise has developed, tested, and implemented responsible business practices to improve the transparency and sustainable management of complex global seafood supply chains and serves as a bridge between the private sector, governments, environmental sustainability, counter-IUU fishing, and social responsibility communities.

## Acknowledgement




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## About this Document

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Due diligence is a common ongoing company practice designed to evaluate business operations, and identify and mitigate any major risks or adverse impacts. There is rising demand for companies to implement Human Rights Due Diligence (HRDD) in response to reported labor exploitation and human rights abuses in seafood. This is seen as the best practice for companies to employ in order to more deeply understand their supply chain, and proactively identify, address, and prevent these issues. Some companies are overwhelmed by the enormity of the effort and the challenges of implementation given what's at stake, their lack of capacity, the complexity and breadth of company operations, and the numerous options for responsible sourcing frameworks, tools, and principles. Companies need support and practical guidance to implement HRDD effectively.

At FishWise, we focus on practical applications and solutions for industry. In an effort to highlight some of the most effective strategies for HRDD implementation, FishWise evaluated various models from across commodities. While HRDD is focused on all rights holders, in this research we zeroed in on the rights of workers, interviewing over 30 stakeholders including: human and labor rights experts, seafood industry representatives, advisors to worker organizations and trade unions, seafood workers, and community level professionals from sourcing communities.

What surfaced from our research were 3 fundamentals within HRDD that companies often miss, but that add depth and rigor to their process. These are not meant to be a menu to choose from, but a trio that should be seen as the backbone of any company's HRDD approach:



**#1: Keep Workers  
at the Core**



**#2: Take Action  
Within the  
Local Context**



**#3: Build a Strong  
Foundation**



This document is unique in several ways:

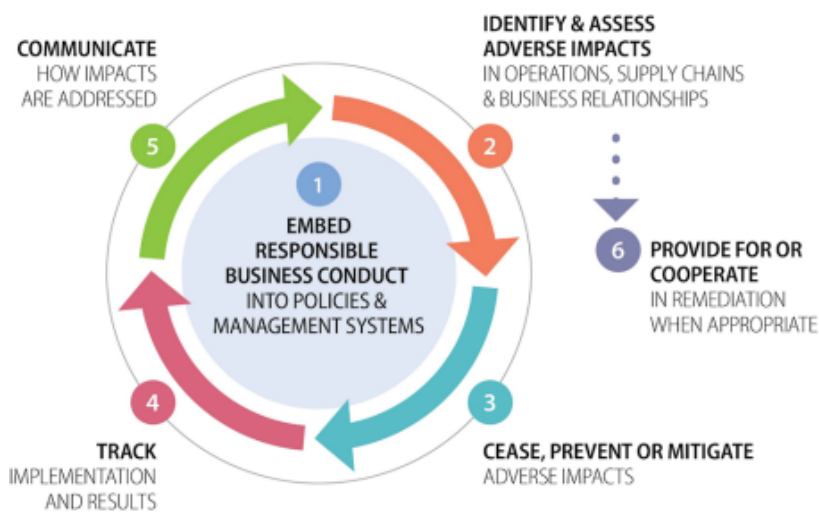
- The content is informed by expert interviews within and outside the seafood sector.
- It focuses companies on the worker experience, and addresses pain points specific to seafood.
- It is designed for end-buyers, brands, and suppliers to use as a supplemental resource to the full HRDD implementation guidance within [FishWise's Roadmap for Improving Seafood Ethics \(RISE\)](#).
- The advice is useful no matter where you are in your HRDD journey or your level of understanding.
- It is written in a plain language style for direct consultation, to cut through all of the heavy jargon and help you understand how to apply these recommendations.

Through this work, we hope to provoke necessary conversations and alignment across the seafood sector, and leave you more empowered to make HRDD a core part of your business.

So let's get started...



## A Brief Overview of Human Rights Due Diligence



This diagram outlines the components of HRDD as defined by the [OECD Due Diligence Guidance for Responsible Business Conduct](#).

Your goal with HRDD is to prevent, identify, mitigate, and address any adverse impacts your business may have on workers, communities, and other stakeholders. HRDD is a comprehensive, cyclical process that elevates your company's social responsibility efforts by focusing on human rights and the worker experience, while considering the ever-evolving nature of the seafood industry.

All aspects of HRDD implementation are built from your clearly defined, publicly available human rights policies and management systems, which cover your own operations and extend through your entire supply chain. Recognizing that company practices may impact workers' rights in different ways, consider each impact through the [Business and Human Rights Resource Centre's framework of involvement](#) to understand how your company is directly causing, contributing to, or simply linked to any adverse impacts. No matter the connection, companies have a responsibility to address and remedy those impacts, but this framework can help shape your response. Your company should have time bound plans, specific rights holder engagement at each step, and communicate publicly on progress and results.

This step-by-step HRDD cycle aligns with the [UN Guiding Principles on Business and Human Rights](#) (UNGPs) and [International Labor Organization \(ILO\) Fundamental Principles and Rights at Work](#), and has been translated into actionable recommendations for the seafood industry in FishWise's [Roadmap for Improving Seafood Ethics \(RISE\)](#) platform.

### Why Should Companies Reconsider Their Approach?

Human rights abuses and labor exploitation continue to be well documented in seafood supply chains across the globe despite existing efforts. Many seafood workers are doing difficult, sometimes dangerous work for low pay, depending on their role, location, and

stage of production. If workers are on a vessel, the risks are amplified. Depending on what they are fishing for or the practices of the employer, workers on vessels may be at sea for a very long time, sometimes years. They can feel isolated, with no way to talk to family and friends, raise grievances, or get the help or remedy they need to fix issues. Throughout seafood supply chains, migrant workers often face heightened vulnerability due to legal status, racial bias, language, or cultural barriers. Women workers are at risk of sexual abuse, harassment, physical and emotional abuse, lower pay, and likely have less agency in the work environment. Workers at sea and in seafood processing risk high incidences of injury and illness directly tied to their jobs.

These risks, combined with an inherent power imbalance between workers and other actors in the supply chain, result in an environment ripe for exploitation, which has serious implications for both seafood workers and your business. Human rights abuses and labor exploitation experienced by workers can expose your company and supply chain to import detentions, civil penalties, legal action, severe brand risk, long-term supply instability, and day-to-day operational risks.

**Risk to workers  
is risk to your  
business.**

In light of these challenges to human rights, a diversity of approaches have emerged as necessary. On the market side, regulations for companies are expanding with an increased focus on mandatory HRDD. One such example comes out of the European Union (EU) which recently passed such requirements in its [Corporate Sustainability Due Diligence Directive \(CSDDD\)](#). Conversely, in those sourcing countries, where government policy, worker-led efforts, or worker organizing is absent, ineffective, or illegal, company-led efforts have been the only mechanism for driving change.

Unfortunately, the traditional corporate model tends to be more hands-off, with end-buyers and brands declaring human rights commitments that are cascaded to others in the chain as costly requirements for doing business. These types of compliance-based approaches often fail to meaningfully engage those most affected, and have not resulted in the systemic shifts needed in seafood working conditions.

Regardless of where your company and supply chain partners are on your HRDD journey, the moment is ripe for you to lean in, engage, show up with resources and support, and align your company practices to your commitment to protect the rights of those impacted by your business. Below we highlight the three fundamentals of HRDD that seafood companies often miss, or struggle to implement. We have paired them with learnings and guidance to help you achieve greater impact on your HRDD journey.



**#1: Keep Workers  
at the Core**



**#2: Take Action  
Within the  
Local Context**



**#3: Build a Strong  
Foundation**

# #1: Keep Workers at the Core



*What does HRDD look like when you keep workers at the core? Your focus is on the lived experience of seafood workers. Worker perspectives, worker participation, and acknowledgment of their rights are integrated into every stage of your HRDD efforts.*

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The most vulnerable workers in seafood are typically those working closest to the product source. They are also highly knowledgeable about the real conditions at that stage in the supply chain, and they can best speak to what needs to change. Consulting with an expert well-versed in worker engagement can support you with research, data collection and interpretation, and provide you guidance for any direct or indirect worker engagement. The right expert can also help your business navigate the process, develop recommendations, and prioritize efforts.

## Incorporate Workers and Worker Perspectives

It is standard practice in any comprehensive HRDD implementation for companies to ensure that all seafood workers have access to a feedback mechanism, or [grievance mechanism](#) to safely elevate issues, with clear pathways to resolve or remedy. You can partner with existing unions, or other trusted local organizations to establish grievance mechanisms. At a minimum, grievance mechanisms should incorporate training that covers how to use the grievance reporting tool, transparency about what will happen after an issue is reported, and a case management system with support and protection for workers in order to safeguard them from threats or retribution when raising issues. The grievance mechanism should also

include a time-bound process that ensures credible remedy for workers, and verification by workers that remediation has occurred.

However, grievance mechanisms are only one part of a worker engagement strategy because they identify issues after they have occurred, where comprehensive HRDD has a broader mandate which includes proactively mitigating risks and preventing issues from occurring.

To incorporate workers and worker perspectives throughout the HRDD process:

- As your company assesses risk and develops priorities, leverage worker-informed, geographic and product-specific data from investigative reports, surveys, worker interviews, academic research, and union communications. Once you identify a short list of prioritized supply chains, dive deeper to understand the risks from the perspective of the workers within their local context.
- If a union or other worker-led association is in place, engage with them to hear what is important to the seafood workers within a particular supply chain or region. If workers are not organized, find a worker-trusted local service organization or gathering place to start.
- Include worker surveys and interviews through tools like [Social Responsibility](#)



[Assessment \(SRA\)](#) and in-depth [Human Rights Impact Assessments \(HRIA\)](#). Share findings with workers and communicate how you will follow up.

- Develop an action plan in consultation with workers who will be impacted by it. Make sure worker needs, perspectives, and priorities are reflected, and the plan addresses the root cause of issues.
- If workers indicate that something needs to change, work hard to change it, and return to share the results, even if unsuccessful. Validate any change in conditions through direct engagement, or avenues such as grievance mechanisms or surveys.
- Continue this cycle of HRDD, soliciting worker perspectives, and, wherever possible, integrating worker participation into decision-making and monitoring.

Be mindful that your worker engagement does not trail off after an assessment or action plan is created. Continue to engage as you address workers' concerns in order to make the process and outcomes richer, more inclusive, and more impactful.

## Engage With Workers Thoughtfully

The primary mandate of HRDD is for a company to mitigate and prevent adverse impacts on rights-holders in its supply chains. This inherently means your company has to find a way to identify and understand these negative impacts. While engaging with workers can be challenging, it is the most reliable way for your business to learn the reality of the worker experience and to identify the most critical issues and ways to resolve them.

However, this can be tricky because company engagement in itself can hold risk to workers and risk to the process. Workers might mask issues for fear of losing their jobs, it can put an unfair burden on them, and direct engagement could put seafood workers at further risk if they are already in an unsafe environment.

When considering engagement with workers, your company should always prioritize their

### Considerations for

## RESPONSIBLE WORKER ENGAGEMENT



### Is this a safe pathway for engagement?

Workers may not speak out due to the fear of retaliation. Establish pathways for workers to speak out safely and, if necessary, anonymously.

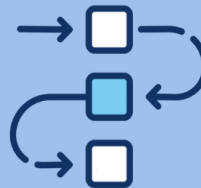


### Does this place undue burdens on workers?

Be aware that reliving trauma and abuse can be difficult. Work with a trusted third-party with expertise in worker engagement.

### Is this best handled locally?

Engagement between worker organizations and employers are typically most effective. Make sure you have a clear and necessary role.



### Will this process lead to follow-up?

If you cannot commit to following up with steps toward improvements and remedy, then do not engage.

safety and needs, engage with workers in groups, not alone, and rely on trusted third party experts to act as guides in responsible and effective worker engagement. Also, do not bypass other actors in the supply chain when you engage. Attempt to coordinate, in order to prevent confusion among workers and avoid undermining other efforts.

Always share what became of the information you gathered and involve workers in the resulting actions. Too often, companies come into sourcing communities, ask questions, but don't follow up, leading workers to lose trust in the process.

To support a company's decision-making process, FishWise has proposed a set of questions to ask before your company decides to pursue direct engagement (see inset, page 9). These questions acknowledge the vulnerability that exists for workers, and therefore can help prioritize safe, respectful, and impactful interactions. You can find more information and resources related to worker engagement on [RISE](#).

### ***Types of Organizations that can Support Engagement***

As your company looks for collaborators to support your worker engagement efforts within sourcing communities, you should consider which might be most trusted and effective. Here are some options:

#### **Democratically Elected Trade Unions:**

Where there are unions in place, they are the avenue to engage with workers. Unions are led by workers and represent them as they collectively fight for their rights, fair pay, and improved working conditions. A worker's ability to organize opens up the opportunity for them to have greater agency, and is a fundamental right as outlined in the UNGPs. Progress is difficult without rectifying the existing power imbalance. Companies and unions do have aligned goals – to eliminate human rights abuses and labor exploitation and to encourage industry stability. This can be achieved if companies foster good relationships built on transparency, effective communication, and commitment to protecting worker rights. Groups like the [International Union of Food, et.al. \(IUF\)](#) can help you get in contact with unions, where they exist.

#### **International Human Rights Experts:**

There are leading non-governmental organizations (NGOs) that have decades of experience helping companies to engage and

take action in sourcing communities and deep within supply chains. They can help guide your efforts and connect you in-country.

#### **Other Worker Organizations:**

Not all worker organizations are formally registered unions. Where no unions exist, oftentimes there are worker associations or co-ops that provide workers similar protections to unions.

#### **Local Community Organizations:**

In geographies where organizing isn't a protected right, or workers don't have the means to organize, there may be local, trusted community groups that support seafood workers in other ways and can facilitate dialogue. These groups can often show you how to navigate the local dynamic, offer capacity on the ground, help understand the root cause of existing challenges, and connect you to their local network in ways that are respectful and effective.

### **Enable Worker-led Efforts**

[Worker-led approaches](#) are those primarily developed, implemented, and monitored by workers (see inset, page 11). When workers are enabled and empowered, particularly when they can organize and enact collective bargaining, their rights are better protected, and conditions are much improved. This positions workers to manage conditions as a group, for themselves, which reduces risk of human rights abuses and labor exploitations and reduces both the risks and related burden to end buyers, brands, and suppliers.

The right for freedom of association and collective bargaining is one of the fundamental rights of workers, and a significant lever for change to improve conditions, which means seafood workers need agency and opportunities to lead.

These are some things your company can do to better enable worker-led approaches in seafood:

- Align supply chain policies, practices, and commitments to uphold workers' right to freedom of association and collective bargaining.

- Require seafood workers to be educated and trained on their rights and contribute resources to make it happen. This can be done through a partnership with a local civil society organization or NGO.
- Require employers to create a Code of Conduct in collaboration with seafood workers which includes support for their ability to organize.
- Require and support the implementation of a trusted grievance mechanism, remediation processes, and associated user-training as part of job training.
- Prioritize purchasing from suppliers and countries that have proper safeguards in place to protect a seafood worker's right to organize. Consider added incentives for suppliers showing stronger commitments.
- Require employers to adopt anti-retaliation policies with associated training for supervisors.
- For seafood workers on vessels, require [wi-fi access](#) on board, with an access agreement that includes terms, hours of use, and privacy stipulations. This is to ensure their freedom of communication and ability to access grievance mechanisms.

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**Ensure wi-fi access on vessels so workers can raise concerns and have them addressed.**

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- Advocate for governments to ratify and implement key international frameworks that help protect the rights of workers in seafood supply chains, such as the ILO Work in Fishing Convention (C188), Port State Measures Agreement (PSMA), and Cape Town Agreement (CTA). Also advocate for governments to pass legislation to uphold freedom of association and collective bargaining in line with the ILO Declaration on Fundamental Principles and Rights at Work, including for migrants.

## Examples of Worker-led Approaches



### Democratically Elected Trade Unions

Trade unions engage in collective bargaining to fight for workers' rights, fair pay, and safe working conditions.

### Other Worker Organizations

Community-based organizations or co-ops that can provide similar protections and avenues for change as unions.



### Worker-designed Mechanisms

Mechanisms designed by workers that establish avenues for engagement, such as worker committees.

### Worker-driven Social Responsibility

Social responsibility system that is implemented by workers and verified via worker-driven monitoring, enforcement, and remediation.



### Enforceable Brand Agreements

Legally binding obligations between brands and worker representatives with commercial consequences for not meeting outcomes determined by workers.

## #2: Take Action Within the Local Context



*How does a company move from the assessment phase to taking action where change is needed most? Start by prioritizing your supply chains and sourcing regions based on the prevalence and severity of potential risks to workers, then reach out at the local level to understand the dynamic in which the issues exist, engage with collaborators, and implement an action plan.*

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### Prioritize Before you Act

Of course you will need to take action if your company is ever linked to specific allegations within your supply chains. But HRDD allows you to take a more proactive approach. As you move through the steps of HRDD you need to decide where to allocate resources to take more robust action in response to the potential risks that surfaced through assessment. Traditional social compliance systems would often lead you to a strictly broad approach, attempting to tackle all supply chains at once with little deep engagement.

A more targeted approach aligns with the UNGPs and is required to be able to address the root cause of issues, thereby driving greater, sustained impact and prevention where it is needed most:

Through research and other supply chain engagement, take stock of the potential issues, focusing on understanding the worker experience across supply chains. Look at pertinent information about each product, sourcing country, and worker population.

Leverage worker-informed data and identify the products, sourcing regions, and supply chains that have the biggest risk and greatest severity of human rights abuses and labor exploitation.

Cross-reference those results with your most critical sourcing areas – those products and sourcing geographies that are the most important to your seafood bottom line, where you have the largest presence, and therefore, might have the greatest ability to influence change.

Once you have identified and prioritized areas of greatest risk to seafood workers, and therefore your company, go deeper to work across your supply chain and engage on the ground, identify the issues, understand the root cause within the local dynamic, and create a plan in partnership with workers.

Finally, take action and move forward to remediate.

Approaching HRDD this way requires a more intensive effort, but will afford greater assurance that issues are being surfaced, resolved, remedied and further prevented. Your company can start this process in your prioritized sourcing regions, and expand this approach across your supply chain in a strategic manner. This method of prioritization becomes critically important as you make internal decisions about staffing, resource allocation, worker engagement and follow through.



## Navigate the Local Context

Each sourcing community operates under a different regulatory, political, and social dynamic, and can often be far removed from your day to day experience. In order to be most effective in this stage of HRDD, you must be able to characterize the specific nature of the issues and the context that surrounds them in order to identify and act on solutions. Desktop research into your prioritized geographies will only get you so far before you should directly engage with local and regional stakeholders in those communities to understand that dynamic and lean on their capacity where possible.

There is no detailed instruction guide for how and with whom a company should engage at the local level because each sourcing community, product supply chain, and worker experience is unique. There are effective frameworks and existing partnerships that your company can tap into to support local efforts. Some international human rights organizations have extensive experience and can provide support and capacity to help effectively navigate the nuances of that sourcing community. You can find some seafood specific examples of regional-level efforts, NGO frameworks, and partnerships on [RISE](#).

Here are some general tips and insights for establishing relationships with local stakeholders in sourcing communities. As you can see, the

intention is very similar to how you would engage with workers:

- If there are trade unions or other forms of worker-led organizations locally, seek them out.
- Engage across your supply chain to coordinate and leverage resources, relationships and staffing on the ground.
- Foster relationships with trusted local organizations to leverage their capacity, and as appropriate, include them in your efforts to identify impacts, support remediation, and verify outcomes.
- Each situation and local relationship is unique. Go in with a plan, but be flexible. Navigate and adapt to the local dynamic to build relationships that lead to lasting solutions. After completion, maintain lines of communication in case new issues arise.
- Local organizations should be compensated for their support. Invest in the relationship and process, but defer to them for guidance on how to do so. Be aware that contributing toward their efforts and capacity could be seen as creating a conflict of interest.
- Show up with curiosity, resources, long-term commitment, and humility. Don't try to lead this yourself unless absolutely necessary – support locals, particularly workers, to take the lead for the most effective solutions.

### What a Company Needs to Know about their Prioritized Regions

- Workforce demographics, the nature of their jobs, presence of trade unions or worker-led efforts in the region, seafood workers' ability and/or barriers to organizing.
- The reality of local, regional, and country politics, the regulatory environment and the level of enforcement.
- How the local industry and community function, identifying the most influential figures.
- Cultural norms, language barriers and any racial tension that may exacerbate the issues.
- The challenges and concerns most pressing for seafood workers, the underlying root causes, and how company activities could be causing or contributing to these.

## Collaborate to Reap Greater Benefits

The seafood industry is vast, but industry collaboration within prioritized higher-risk sourcing regions holds great opportunities for your company:

**Learning:** A pre-competitive structure allows companies to learn together and build internal capacity with greater support and structure.

**Leverage:** Most companies source products from communities similar to their competitors, and thus they may face similar labor risks. So while individual companies may struggle to exert influence over producers, processors, or governments, they can band together with others to create leverage and affect greater change.

**Alignment of Approach:** Collaborative efforts can help address systemic risks in a region through a coordinated approach. This also greatly reduces the HRDD burden on actors further up the supply chain, especially when companies align their HRDD standards or create a system of equivalency, where market requirements for any one buyer can be met using a variety of equivalent methods of assurance.

**Distribution of Costs:** If market actors work together in a supply chain and sourcing region, then all local employers can be held to a consistent, higher standard. This makes better practices the norm in the region, thereby removing the argument that investing in improved practices makes some producers less competitive because they cannot compete on cost.

**Data Sharing:** Within industry collaborations, companies can share data and coordinate to collectively identify risks, capacity needs, and solutions in specific sourcing geographies.

**Less Burdensome for Workers:** Industry collaboration can also reduce the burden and duplication of engagement on seafood workers

and better foster meaningful engagement through joint processes or mechanisms.

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**Together, companies can share resources and information, and have more influence to drive change.**

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There is a building appetite among companies to collaborate with competitors and other industry actors to tackle issues in the toughest regions. Your company can consider pre-competitive industry groups, such as [Global Tuna Alliance \(GTA\)](#), [SeaBOS](#), [Seafood Ethics Action \(SEA\) Alliance](#), [Seafood Legacy](#), or [SeaPact](#). There are also several collaborative projects currently active in seafood, or companies can create a pre-competitive industry partnership themselves, pulling in others that source products from the same region. Visit [RISE](#) to learn more about collaboration.



# #3: Build a Strong Foundation



*What does it take to have a strong foundation for your HRDD program? To truly do this work well, your HRDD implementation must be seen, not as a side project, but as a core part of doing business. Company staff and culture must be aligned to your company's commitment to human rights and the HRDD process. Sufficient staff time and resources must be allocated to execute this work, and your procurement practices need to reinforce these efforts across your supply chains.*

## Orient Company Culture

One person within a company cannot be solely responsible for delivering effective HRDD. Commitment to the process needs to be reflected in how your company works, its communications, and its actions. To do so requires the buy-in and continued support of senior management, including C-Suite leaders. The role of your leadership is crucial; leaders can send a clear message to all staff, empowering them to set expectations for business partners,

and providing performance objectives, incentives, training, and capacity necessary to effectively address human rights issues ([CEO Guide to Human Rights](#)).

All departments must be on board and trained to use your company commitments as a filter for business decisions and actions. Start by educating company leadership and supervisors about the worker experience and why it is relevant to your business.

### Tips to Orient Your Company's Culture

- Implement training for company employees, particularly leadership, so everyone understands the need for impactful HRDD, the value of worker engagement, and the reality of the seafood workers' lived experience. Highlight how risks to seafood workers impact the success of the company.
- Align commitments and policies to support the protection and promotion of worker rights.
- Establish coordination between internal procurement teams and those responsible for HRDD activities to align decisions and practices with your company's commitment to human rights.
- Regularly engage with supply chain partners in conversations about the experiences of seafood workers. This will send them a signal about the level of commitment and clarify your company's expectations, as well as help gather perspectives on the experience of workers in their respective sourcing regions.
- Embed supply chain information, HRDD risk assessment data, activities and results into your company's strategic planning and risk management efforts
- Have a publicly accessible human rights policy which reflects senior leadership buy-in and commitment to the UNGPs, and publicly share all HRDD time bound plans and resulting achievements.

## Allocate Staffing and Resources

The big question is always, who should pay for HRDD? Often major commitments are made by brands and end-buyers, while the cost is borne by other supply chain actors in the chain. Those closer to the product often do not have the resources or the influence to tackle human rights issues by themselves, and their margins are tight due to competition on pricing. They need the support and investment from those closer to the market that create demand for the product. That is why a basic requirement of HRDD is that companies allocate sufficient resources for implementation across their supply chains. It should be seen as a cost of doing business.

Everyone in the supply chain, starting with end-buyers, needs to invest their fair share of resources, not just for assessment and monitoring, but for engagement, remedy, and prevention of issues. There are a couple of ways buyers can contribute and help manage costs: by paying a fair price for the product that incorporates support for meeting market requirements, by aligning expectations across industry in order to lessen the overall cost burden for suppliers and producers, and by

investing in improvement efforts in their supply chains. Companies should conduct a broad assessment of current resource allocation and cost to determine if they are sufficiently contributing. No matter where your company sits, this is an investment in the well-being of seafood workers, and in the strength of your supply chain and brand.

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***Requirements must be supported financially and vetted for feasibility before cascaded to others.***

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Implementing HRDD is not something your company can fully outsource. You must have dedicated staff and resources available. It takes time, money and external expert support to understand and navigate the experiences of seafood workers in each prioritized sourcing region, collaborate with external partners on solutions, and implement changes to company practices. Your staff also needs to coordinate communication between internal stakeholders and others in the supply chain to clarify company commitments and expectations, and to continue to monitor progress.

### Considerations for Resource Allocation

- Have dedicated staff, or coordinate with local partners in higher-risk sourcing regions to ensure a consistent presence and foster the relationships necessary to drive improvements.
- If leveraging existing staff to support implementation components of HRDD, budget for training and integrate human rights indicators into their performance evaluations.
- Set aside resources for external experts who can guide your company activities and add needed capacity.
- Collaborate with like-minded companies on efforts in sourcing regions to combine and leverage resources.
- Include funds in the budget for activities beyond assessment, such as action planning and providing remedy.
- Avoid cascading all costs and social accountability to others in the supply chain.



## Align Procurement Practices

Until recently, most industry efforts have been driven by market actors, with a primary focus on cascading market requirements. This approach is incomplete. End-buyers, brands, and suppliers need to examine their own buying practices and how they might be exacerbating human rights abuses or labor exploitation. Often companies are unaware or underestimate their role in how they cause or contribute to these problems.

### *If you're not careful, how you buy product could add to your risk.*

Intense competition for a buyer's business, short-term contracts, and last-minute dealings can push suppliers to engage in a 'race to the bottom' on price. This can cause suppliers to push producers and processors on price, leading them to tighten their expenses, largely affecting labor-related costs including wages, safety equipment, and food and housing for seafood workers. In addition, last-minute 'spot-buying' to fill gaps in product in order to meet demand can bring unvetted producers into the supply chain. It is also a common practice for some buyers to oscillate between numerous suppliers based on price and availability. These practices are not unique to the seafood sector, but can create unmanageable supply chains that are problematic for reasons beyond human rights

implications – including supply chain resilience, quality assurance, traceability, and environmental considerations. In addition, end-buyers who cascade costs of social compliance to their suppliers cause producers and processors to bear the majority of the costs of social compliance audits and certifications, creating market access issues for those who cannot afford them, particularly impacting family-owned businesses and small-scale fishers.

Encouraging coordination between your company's social responsibility team and procurement teams can lead to greater awareness of risks and creative solutions. As you break down these silos, speak with your suppliers and producers to learn how your company practices and pricing structure may be impacting their ability to meet human rights expectations. This is another stage of HRDD where companies can work within pre-competitive structures to share resources and insights for further learning opportunities. Once you have identified any purchasing practices that run counter to your company commitments, you should work with your buying department to make the necessary changes.

The Better Buying Institute has [Five Principles for Responsible Purchasing Practices](#). These were created with years of data from suppliers on what could improve their business's ability to provide good working conditions. We recommend this as a key resource for your company!

### How to Better Align Sourcing Relationships

- Set up longer-term sourcing partnerships and binding contracts that provide stability and security to suppliers and producers to motivate their investment into improving practices and resolving challenges.
- Vet new suppliers and producers for their performance against human rights commitments prior to establishing a contractual relationship, and vet proposed sourcing geographies for risk of systemic human and labor rights abuses.
- Scrutinize contract terms to ensure they take full account of the cost burden placed on suppliers to meet HRDD requirements and invest in proper conditions and fair wages.
- Include human rights expectations in contract agreements as a condition of doing business.
- Focus on a manageable number of suppliers that can support traceable, responsible, and legally compliant supply chains. This has benefits for environmental and food safety considerations as well.
- Provide incentives to better performing suppliers, such as promotional or growth opportunities, additional resources and trainings to enhance their business, and longer term contracts.

## Next Steps

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Comprehensive HRDD is not easy, but is necessary for companies who want to remain competitive with ethical, secure and stable seafood supply chains. The seafood industry, in collaboration with governments and civil society, must take full accountability for the ocean resources and the people who depend on them. The way companies do their part is by moving through the full cycle of due diligence with a thoughtful, rigorous and inclusive approach focused on workers' rights and the worker experience. The actionable recommendations and considerations in this supplement are intended to help companies like yours jumpstart their HRDD efforts. As a first step, your company can take a fresh look at your business, and ask these questions:

- How are we keeping workers at the core of our HRDD implementation?
- Are we taking action within the local context in our prioritized sourcing regions?
- Do our HRDD efforts build off of a strong foundation within our company?

Based on the answers, you can assess how to design your HRDD approach and management systems, and reallocate resources for better results. Consider these fundamentals as you move through each step of your HRDD process.

Effective HRDD requires commitment to the long-term, a hunger to affect change, and a spirit of collaboration. But you do not have to start from scratch! FishWise has a platform of resources available for free at [The Roadmap for Improving Seafood Ethics \(RISE\)](#), and over the coming months RISE will continue to be updated with additional tools and information. You can also consult with like-minded peers, and human rights and social responsibility professionals, including [FishWise](#), who can assist you in the design and implementation of your efforts no matter where your company is on its journey. Remember, you are not alone!





**RISE**

