



# **Social Responsibility Assessment (SRA) Tool Guidance on Determining the Unit of Assessment (UoA)**

February 2022, Version 1.0



## Contents

<b>1</b>	<b>Background &amp; Introduction to the SRA Unit of Assessment .....</b>	<b>3</b>
1.1	Scope.....	3
1.2	How does the SRA Define the UoA?.....	3
1.2.1	Wild-capture Fisheries.....	3
1.2.2	Processing Sites.....	3
<b>2</b>	<b>Purpose.....</b>	<b>4</b>
<b>3</b>	<b>Considerations for Determining Scope.....</b>	<b>4</b>
3.1	Socio-Economic Factors .....	4
3.1.1	Geographic Spread .....	4
3.1.2	Management Entity.....	5
3.2	Communicating and Understanding SRA Results.....	6
3.3	Additional Guidance for Fishery Improvement Projects (FIPs) .....	7
<b>4</b>	<b>Example .....</b>	<b>8</b>
4.1	Example 1: Geographic Spread (Jurisdictional and Regional Considerations) .....	9
4.1.1	National Jurisdiction .....	9
4.1.2	Regional Differences .....	10
4.1.3	High Seas .....	12
4.2	Example 2: Management Entity .....	17
<b>5</b>	<b>APPENDIX.....</b>	<b>19</b>
5.1	Guidance for UoA with Multiple Management Entities .....	19

# 1 Background & Introduction to the SRA Unit of Assessment

The Unit of Assessment (UoA) comprises the individuals (workers, fishers, and farmers) and sites (vessels, aquaculture farms, and/or processing sites) that are included in the scope of an assessment. The SRA defines the UoA primarily in relation to a fish stock and gear type, similar to how seafood standards typically define scope for environmental audits and assessments. While vessels and individuals are usually not taken into consideration for environmental assessments, when implementing the SRA these elements are important to clearly define the UoA. In some cases, this will be relatively straightforward, as with smaller farm operations or fisheries with local fish stocks. More complex supply chains, however, often include a less homogenous population and thus more nuanced social issues.

As the SRA is a tool to help users better understand social risks in a supply chain, the scope of the UoA can have a significant effect on the results. In other words, the resulting risk level(s) will vary depending on what you choose to assess. Aggregating an assessment into an inappropriate UoA could generate misleading results. Aggregating too broadly may hide high risk regions that are included in a UoA that is largely low risk, or vice versa. On the contrary, grouping too granularly may result in similar evaluations that are costly and time intensive.

While there is no “right” or “wrong” way to define the scope of a UoA, it is critical that implementers define the UoA carefully. The information provided in this document is designed to equip implementers with a basic understanding of considerations that should be taken into account when defining the UoA.

## 1.1 Scope

The guidance in this document is intended for wild-capture fisheries and processing facilities. Specific examples can be found in Section 4.

## 1.2 How does the SRA Define the UoA?

### 1.2.1 Wild-capture Fisheries

For wild-capture fisheries, the UoA is primarily defined by the target stock(s), combined with the fishing method/gear (including vessel type(s)) pursuing that stock. The UoA is secondarily defined by any fleets, groups of vessels, individual fishing operators, or other eligible fishers that are included in the assessment. All fishers, whether employed by management directly, or hired through a third-party (e.g., a recruiter or labor contractor), should be included in the Unit of Assessment.

### 1.2.2 Processing Sites

For processing operations, the UoA is best defined by the sites and individuals managed under one legal company/management entity. Subcontractors, such as those that provide transportation for workers or product, are not included as part of the UoA. All workers, whether employed by management directly, or hired through a third-party (e.g., a recruiter or labor contractor), should be included in the Unit of Assessment.

Different types of operations may fall under the same scope of an assessment. For example, a single UoA may include both wild-capture vessels and a processing site.

## 2 Purpose

The purpose of this guidance document is to provide advice on determining the UoA by illustrating elements that should be taken into consideration. These can be divided into two main categories:

- + Socio-economic factors: This document provides detail on geographic spread and management entities. There are, however, other factors that can be considered for determining the UoA, such as migrant worker population or presence of recruiters or labor contractors, among others.
- + Communicating and Understanding SRA Results

Additionally, Section 3.3 is dedicated to guidance for determining an optimal SRA UoA for Fishery Improvement Projects (FIPs), which already have a UoA for environmental assessments defined by the species and gear type.

## 3 Considerations for Determining Scope

### 3.1 Socio-Economic Factors

Since working conditions depend heavily on the socio-economic context, including local conditions and employer management, geographic spread and management entities are two of the most important factors to consider when defining the UoA.

#### 3.1.1 Geographic Spread

##### Interjurisdictional

A UoA defined only by stock and gear may incorporate multiple national and local jurisdictions, and Exclusive Economic Zones (EEZs), as well as the high seas, which are managed by Regional Fisheries Management Organizations (RFMOs). Each jurisdiction will likely be unique in terms of laws, regulations, culture, norms, and other socio-economic factors. Even within the same jurisdiction, risk levels may differ greatly for individuals working in the same fishery.

Where a stock crosses between multiple countries, it is best practice for the SRA to, at a minimum, take place at the country-level (see example in [Figure 3](#)). This is because differences between countries may influence the overall risk outcomes. For example, rights to freedom of association vary across countries. When approaching the UoA based on the stock alone, it will be common to have a UoA that spans more than one country (e.g., Vietnam and Thailand). Since rights to freedom of association are more restricted in Vietnam than in Thailand, Vietnam will score as high risk on indicator 1.1.4 of the SRA, Freedom of association and collective bargaining, than Thailand, *if the two are broken into two UoAs and scored separately*. If, instead, there is a single UoA covering both Thailand and Vietnam, the differences between the Vietnamese and Thai contexts will be more difficult to see in the final score. This is just one example of how merging different jurisdictions into a single UoA can affect the results of the SRA.

Groups of vessels that fish primarily on the high seas may be grouped according to flag state (see example in [Figure 11](#)) at a minimum. However, management entity and/or landing site location where different from the flag state, (see example in [Figure 7](#) and [Figure 8](#)) may be considered here as well.

##### Regional

Although more difficult to discern, regional differences within the same jurisdiction may also affect the results of an SRA. There may be cultural differences, differences in municipal regulations, or other socio-economic contexts.

While it can have an effect on the entire SRA, it could be of particular importance to adequately assess Principle 3: Improve Food, Nutrition, and Livelihood Security. There is no one-size-fits-all means to determine when a regional split should be considered for the SRA, however the following questions may help determine the best course of action (see example in [Figure 4](#) and [Figure 5](#)):

- + Do the individuals fall under the same labor structure (e.g., individual operator vs. employed worker/fisher)?
- + Does one region have a higher proportion of migrant labor than another region?
- + Are there known cultural differences between the regions, such as religious belief or customs?
- + Are the regions at similar stages of economic development?

### 3.1.2 Management Entity

#### Definitions:

- + **Management Entity:** The management entity is defined as all vessels, sites, and/or individuals that are subject to a single or collective authority. For example, a management entity could be a fishing cooperative, a company that owns a fleet of vessels, or a vertically-integrated company with harvest, processing, and brand operations. The management entity may or may not be defined legally: a cooperative could be formally registered under the law, or it may be a group of individual operators that work collectively within a community without forming a legally registered cooperative.
- + **Management Entity Type:** The type of management entity refers to how it is organized, both legally and by characteristics. A management entity type could be defined as industrial scale or artisanal. It could also be defined as a privately owned company with hired labor or a fishing cooperative of individual operator members.

Because different management entities have different norms, systems, rules, and processes, they will tend to have different levels of risk and different approaches to reducing risks. This means management entities are an important consideration when defining the UoA.

#### Each Management Entity as their Own UoA

The simplest way to define the UoA is to assess the SRA at the management entity level, even if multiple management entities fish the same stock with the same gear (see example in [Figure 12](#) and [Figure 13](#)).

#### Grouping Multiple Management Entities into a Single UoA

If the implementer would like to include multiple management entities in the scope of a single UoA for an SRA, some considerations must be made to ensure the findings of the SRA are valuable to all entities. One of the main challenges is decision-making and accountability. When management entities are grouped together, a finding at one site will affect the risk score of the entire UoA. Without defined decision-making and accountability, this can make it more difficult to define interventions and monitor improvements and may lead to conflict between management entities. On the other hand, one advantage to grouping multiple entities under a single UoA is that it can be a more cost-effective way to undertake an SRA. [Appendix 5.1](#) outlines some best practices for UoAs containing multiple management entities within the scope of a single assessment.

#### UoA with Different Management Entity Types

Different management entities may also be characterized by different scales, types of vessels or fishing practices (e.g., artisanal vs. industrial), and/or labor types (a cooperative of individual operators vs. a private company with hired labor). It is not recommended to mix management entities with these kinds of divergent characteristics.

Because the contexts are unique, different SRA indicators apply, and the risks are inherently different. Although discouraged, the SRA can still be implemented across multiple sizes and types if necessary.

### 3.2 Communicating and Understanding SRA Results

Depending on the audience, the way the results are communicated and understood by interested parties will be an important consideration when scoping the UoA.

The UoA can be scoped narrowly or broadly, depending on the desired outcome:

- + **Narrow:** A narrowly defined UoA is best suited to gain detailed results. Examples of narrowly defined UoAs include a single region or community, or a single management entity. Conducting an SRA with a narrow UoA will allow you to see disaggregated risk information for different regions/cities/communities or management entities. Results from an SRA on a narrow UoA will also better enable a more targeted, specific improvement plan, and easier monitoring of those improvements. This level of granularity would be well suited for those trying to investigate and improve risk levels at the site level.
- + **Broad:** A broadly defined UoA is best suited for high-level risk information that may be easier to digest than multiple results from narrowly defined UoAs. Examples of broadly defined UoAs include a single country or RFMO, or a single stock and gear type. An SRA with a broad UoA can support the development of strategies or interventions at a large scale. For example, this approach may be best suited for a government seeking to understand and address risks at a national level, or a retailer seeking to understand risk at a fishery or FIP level.

**Table 1:** Examples of scoping the SRA to ensure the results meet an audience need.

Audience	Purpose for implementing the SRA	Suggested UoA	Level of Granularity
<b>Fishery Improvement Project (FIP)</b>	To meet FisheryProgress reporting requirements.	See Section 4.3 below for guidance.	Narrow or Broad
<b>Supplier/exporter</b>	To differentiate their product for brands and retailers and/or show sourcing requirements are being met.	The UoAs should be defined at the management entity level as it forms the basis of sourcing decisions. ( <a href="#">Figure 13</a> )	Narrow
<b>Brand</b>	To selectively source from suppliers that can demonstrate medium or low risk SRA results for a particular species, gear, and country.	Separate UoA for each country. Multiple management entities may be included in the scope of the same SRA. ( <a href="#">Figure 3</a> )	Broad
<b>Retailer</b>	To segment suppliers according to species and country.	Separate UoA for each country and species. Multiple management entities may be included in the scope of the same SRA. ( <a href="#">Figure 3</a> )	Broad
<b>Government</b>	To inform policy and budgeting.	A single, country-level UoA. Multiple management entities would be included in the scope of one UoA. ( <a href="#">Figure 3</a> )	Broad

Academic	To answer a research question.	The scope of the UoA would be dependent on the research question at hand.	Narrow or Broad
----------	--------------------------------	---	-----------------

### 3.3 Additional Guidance for Fishery Improvement Projects (FIPs)

A Fishery Improvement Project (FIP) is traditionally defined according to environmental factors: target stock and gear type. While the SRA also uses this definition broadly, there are secondary factors to be considered when determining the SRA UoA, and therefore the social UoAs for FIPs may differ from the environmental UoAs, as demonstrated by the considerations above.

Separating FIP participants into multiple SRA reports that span an entire environmentally-defined UoA is acceptable, so long as all participants are assessed in the scope of at least one SRA. Additionally, methods can be used to aggregate findings from multiple SRAs to summarize the SRA results at the level of the environmental UoA.

There are two options a FIP can consider when scoping the UoA for an SRA:

- + Option 1: Match the SRA UoA to the entire scope of participants defined within the environmental UoA.
- + Option 2: Define multiple SRA UoAs according to the considerations listed above and/or other social factors.

*Note: The SRA UoA should consist exclusively of FIP participants. Non-FIP participants should not be included in the scope of a FIP's SRA Unit of Assessment.*

Reasons to separate out SRA UoAs from the environmental UoA are as follows:

Reason	Recommendation	Explanation
Scoring & Results	It is recommended to divide a FIP that spans a large geography and/or has a high number of management entities.	When grouped in a single assessment, results are aggregated at the UoA level. Therefore, in a larger FIP with a large number of participants, it will be difficult to distinguish between those participants with weak practices and those with more robust practices.
Targeting Improvements	It is recommended to divide a FIP that spans a large geography and/or has a high number of management entities.	Accountability when driving improvements is important. The larger the UoA and the more management entities included, the harder it will be to pinpoint improvement areas, and focus time and resources.
Assessment Accuracy	It is recommended to divide the UoA according to where there are SRA indicators that differ between groups fishing in the same stock with the same gear.	Some indicators assess risk based on national legislation, some are based on fishery size (i.e., small-scale vs. industrial), and others are only applicable to onshore or offshore individuals in scope. The results of the SRA will be most accurate and clear where the UoA is separated according to these factors.

## 4 Example

The example below demonstrates how a Unit of Assessment can be divided based on certain key factors. These are recommendations, and there are often multiple options. There is no one right answer as to how the Unit of Assessment should be defined, and factors such as those in Section 3 should be well understood before finalizing the Unit of Assessment.

The following examples focus on how an environmental UoA might translate to SRA Units of Assessment. The environmental UoA focuses on stock and gear type. The stock in our scenario migrates through the EEZs of Country 1, Country 2, and Country 3, as well as the high seas. All vessels are fishing with the same gear. Country 1 and Country 2 only have one landing site, and Country 3 has two landing sites (Figure 1). As the example progresses, new variables are introduced; the diagrams demonstrate how these variables can impact how the UoA is defined.

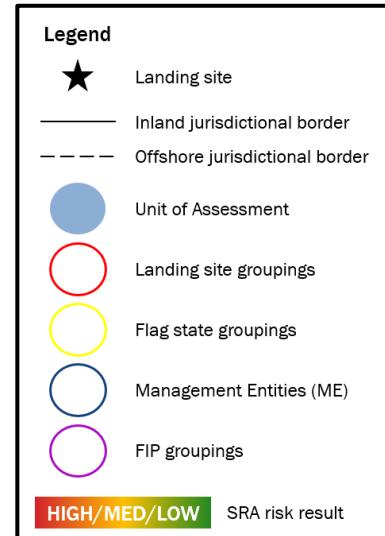


Figure 1: Diagram legend - applies to all diagrams in this example.

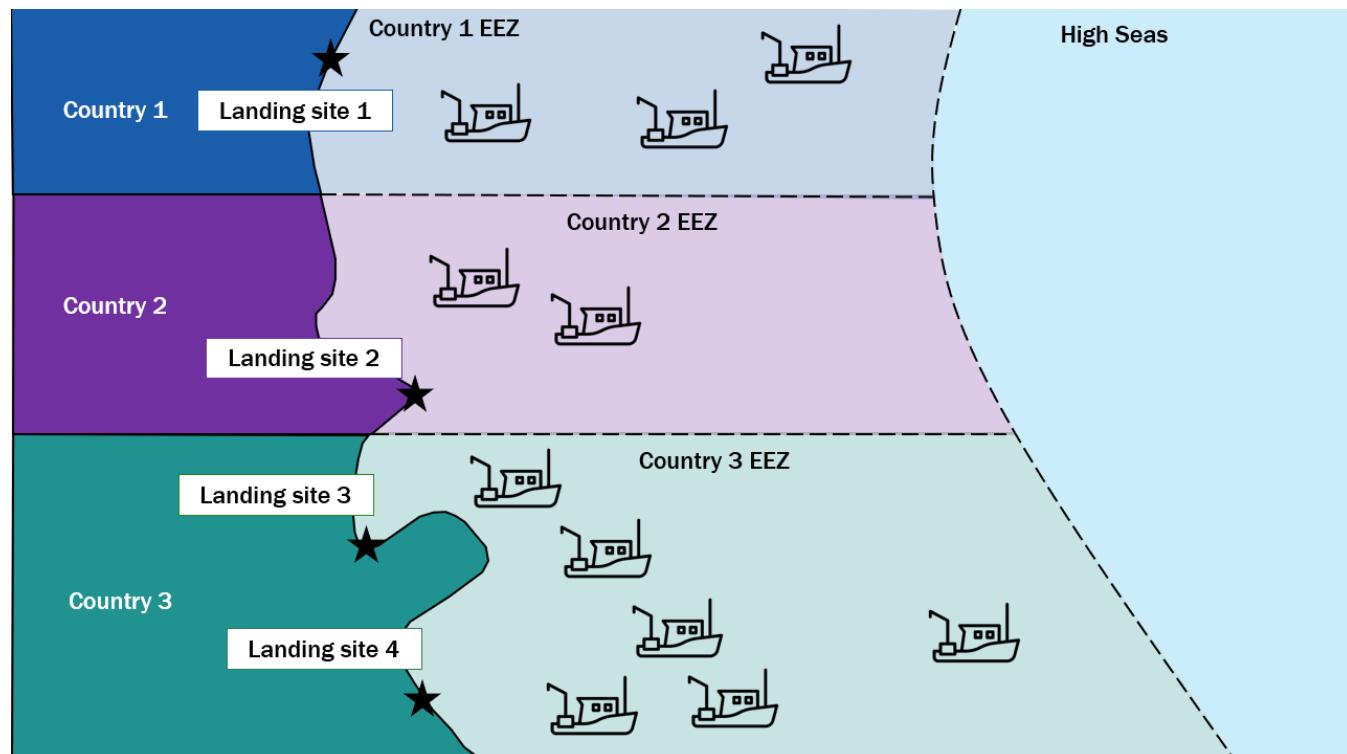


Figure 2: An example of all the countries, vessels, and landing sites that could be included in a UoA based on stock and gear type.

## 4.1 Example 1: Geographic Spread (Jurisdictional and Regional Considerations)

See Legend in [Figure 1](#).

### 4.1.1 National Jurisdiction

As you can see below in Figure 3, there are numerous vessels fishing within their own EEZ and no activity in the high seas. Each vessel lands at a landing site within their own EEZ. In this case, the UoA is defined by the vessels fishing within the same EEZ, and therefore fall under the same jurisdiction. This results in a total of three UoAs (Figure 3).

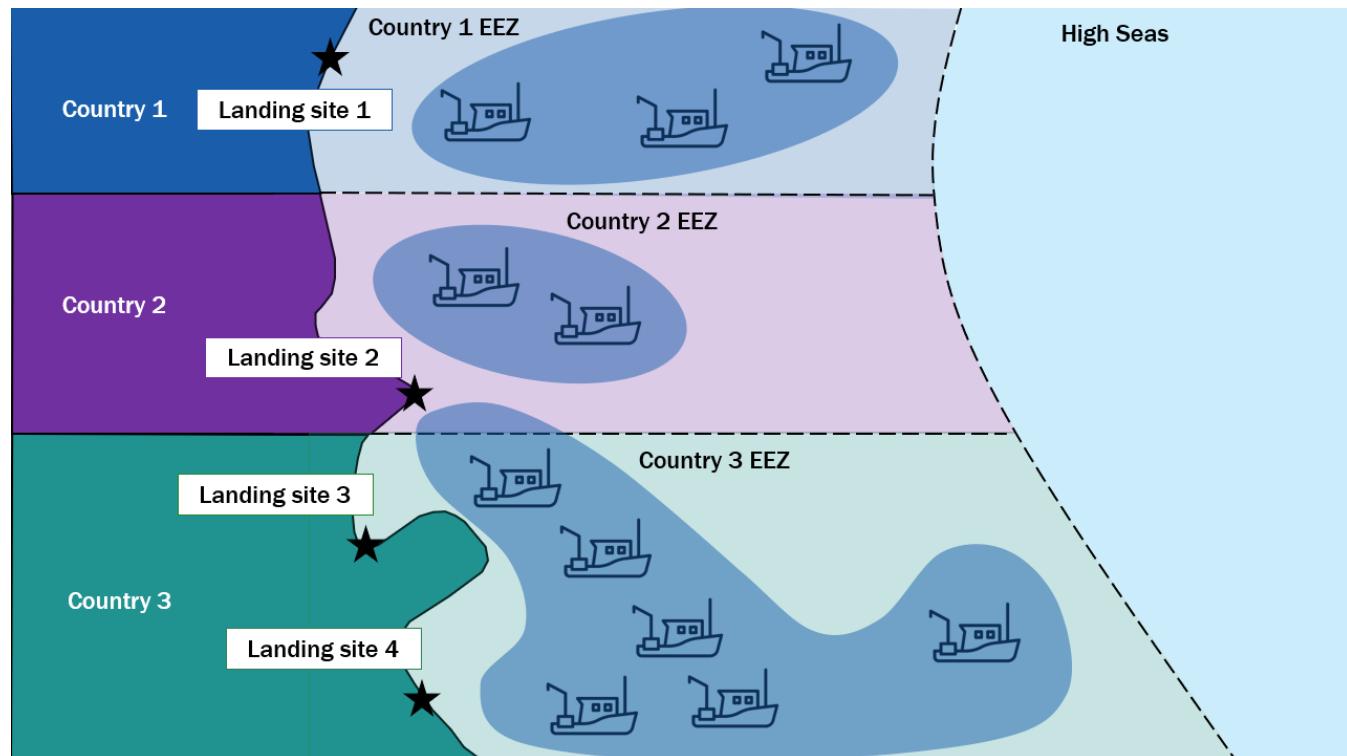


Figure 3: Defining the UoAs according to their jurisdiction. This results in three UoAs (shaded in blue).

#### 4.1.2 Regional Differences

In Country 3's UoA, there is a group of vessels that only lands at Landing Site 3 and another group of vessels that only lands at Landing Site 4.

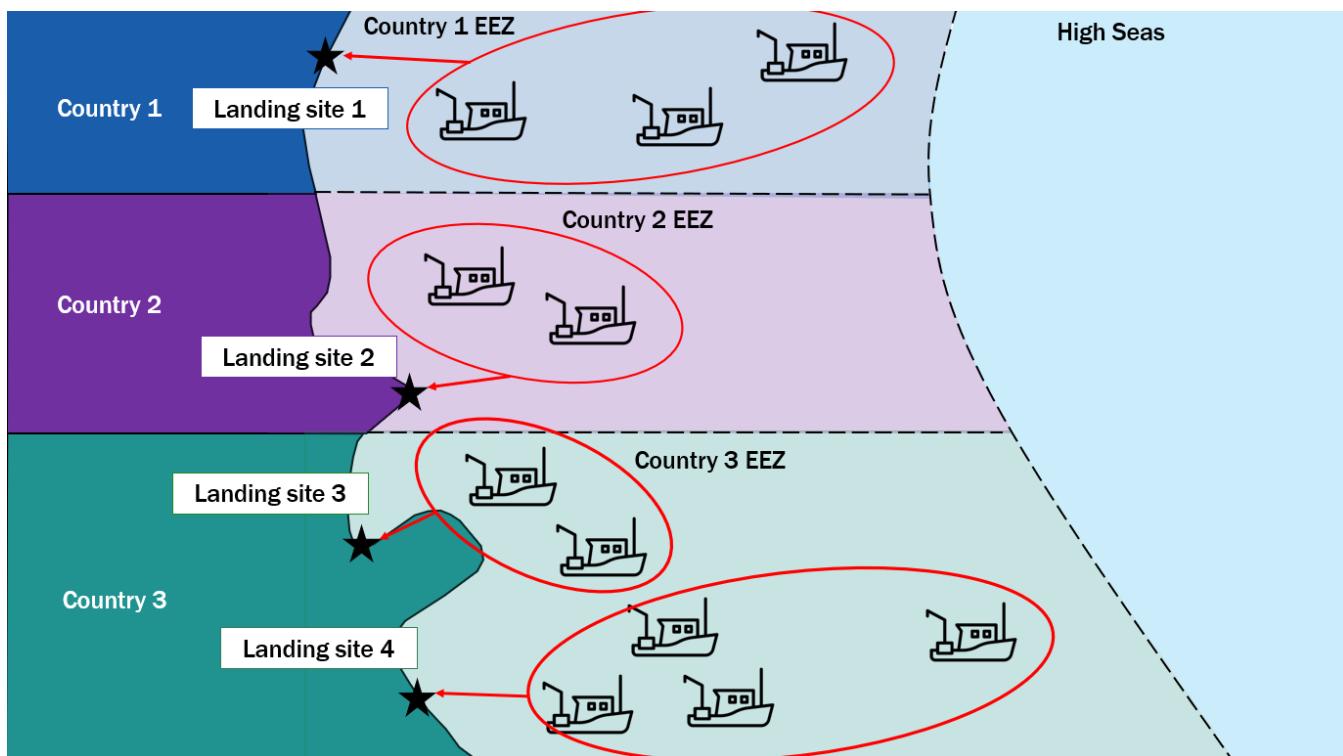


Figure 4: Example where vessels within Country 3's EEZ (circled in red) use two separate landing sites.

There are some significant regional differences between the workforce at Landing Sites 3 and 4. There is a higher proportion of migrant labor from Country 2 working on the fleet that is landing at Landing Site 3. A migrant labor worker may face different social risks, therefore the UoAs are further defined by landing site, thus resulting in four UoAs (Figure 4).

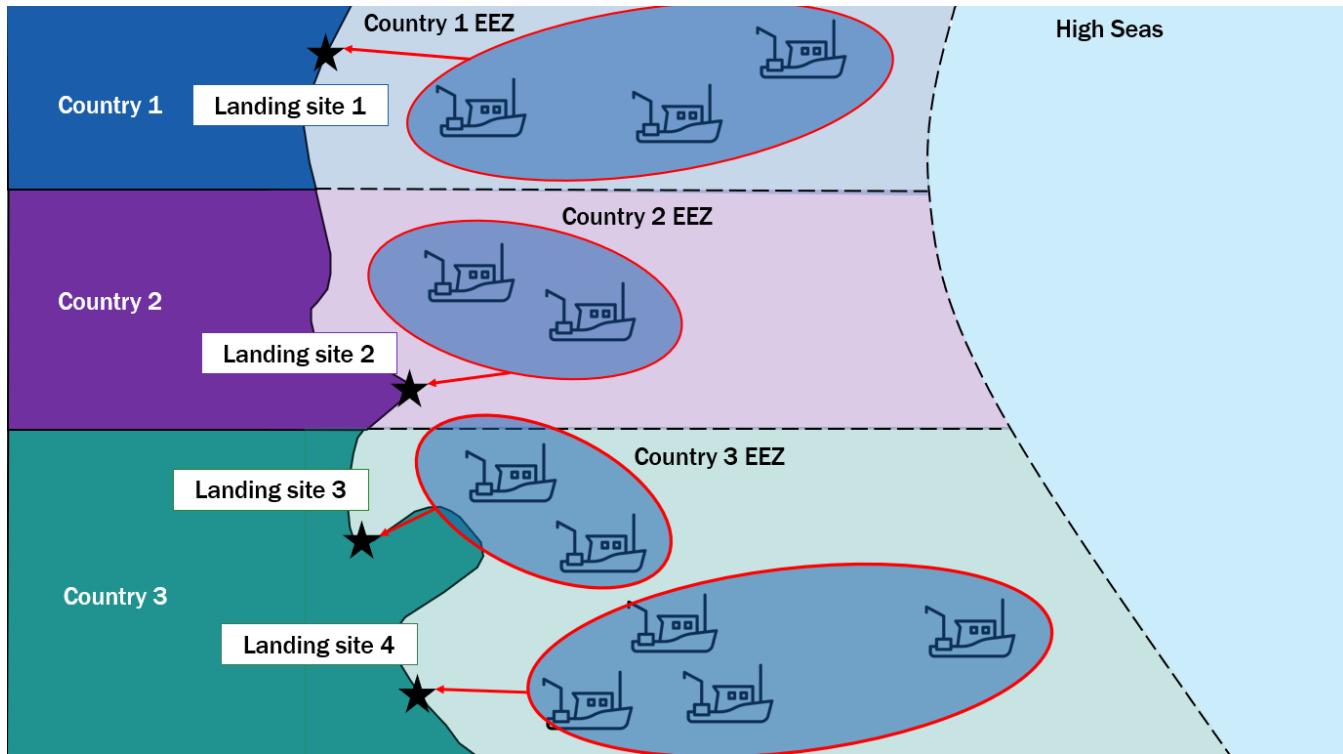


Figure 5: Example of dividing the UoA according to regional differences at landing sites.

#### 4.1.3 High Seas

See Legend in [Figure 1](#).

In Figure 6, there are vessels fishing in the high seas, offloading catch at specific landing sites in Countries 2 and 3. The fishing activity on the high seas falls under the jurisdiction of a Regional Fisheries Management Organization (RFMO). The red lines in Figure 5 indicate the landing sites used by vessels, both those fishing within EEZs and those fishing the high seas. The yellow lines indicate vessels operating under a common flag state (Figure 5).

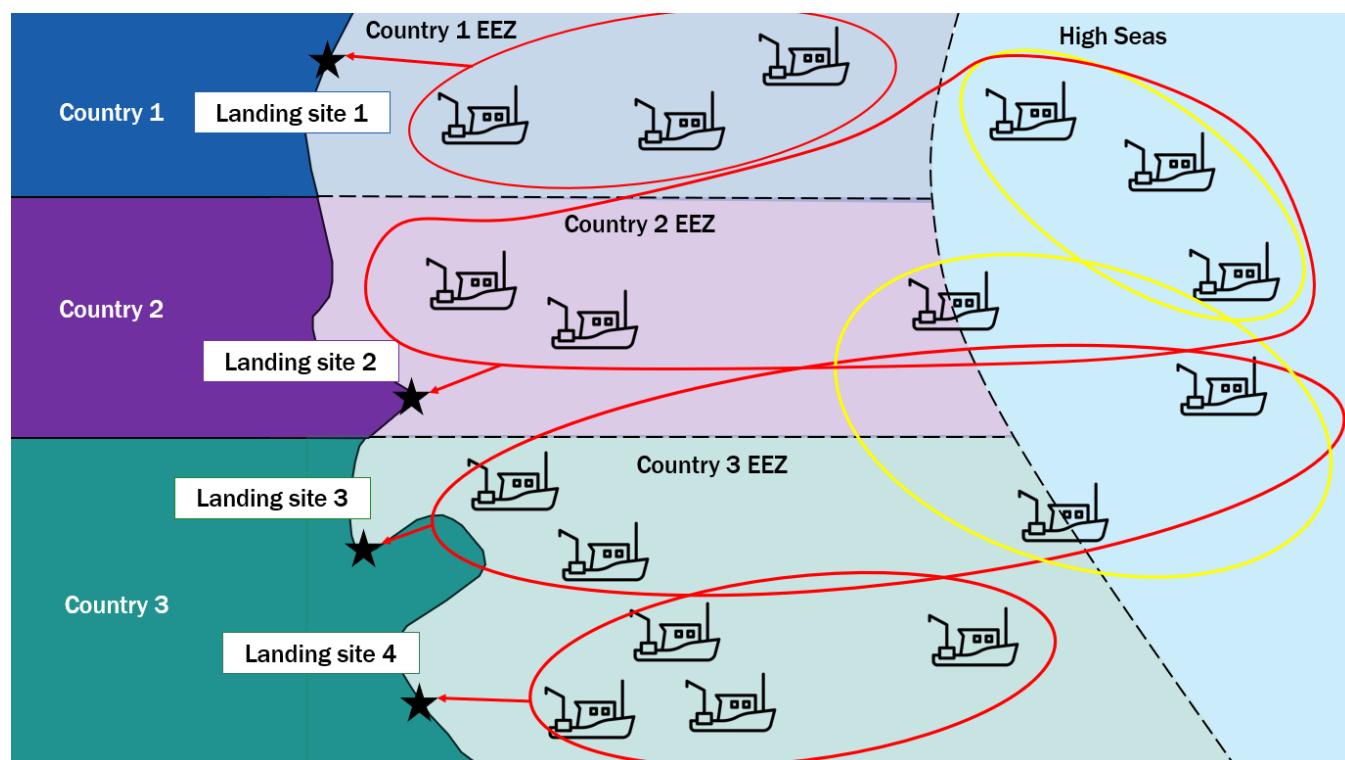


Figure 6: Vessels fishing within a single EEZ and vessels fishing on the high seas. Note some vessels fishing in the high seas will fish in certain EEZs occasionally.

There are different approaches for defining the UoA(s).

You may want to understand risk based on the vessels landing in a particular country and/or landing site. Dividing the fishery into four UoAs will help facilitate this (Figure 7).

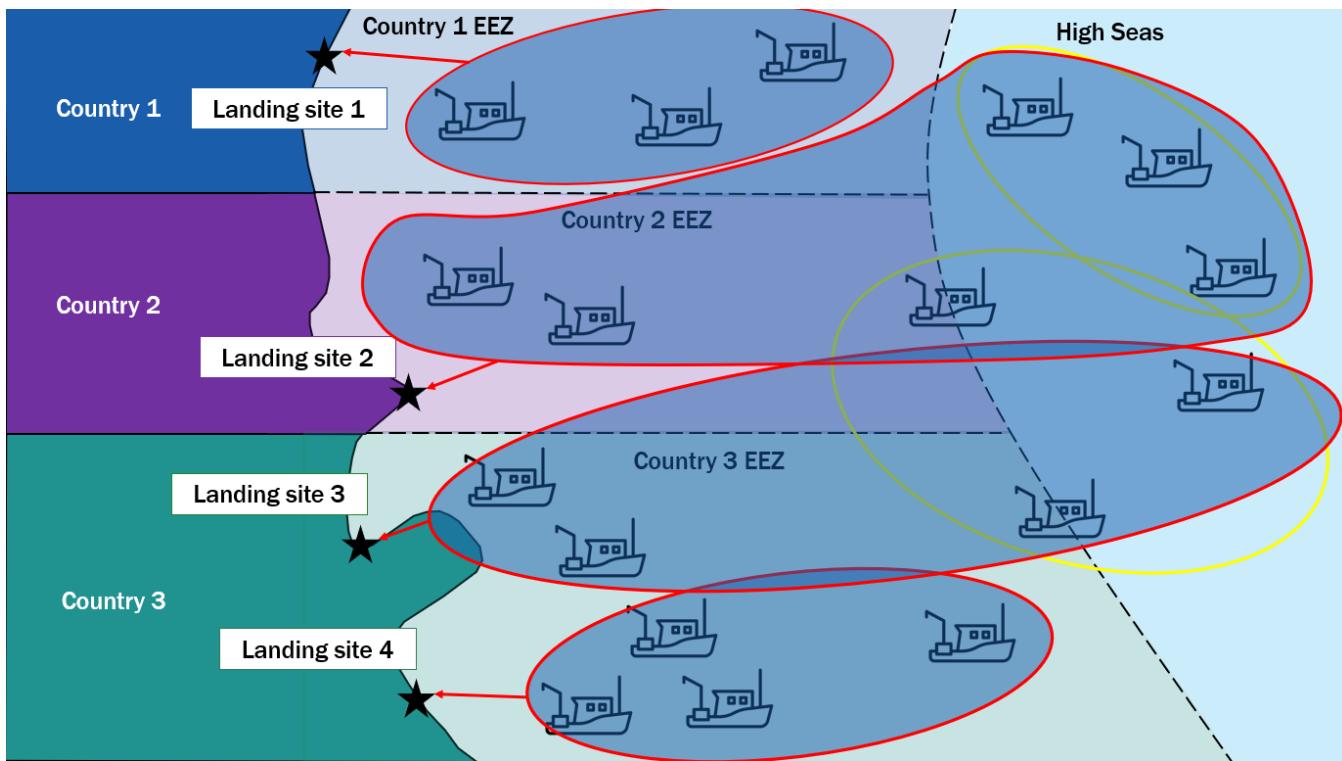


Figure 7: Defining UoAs to determine social risk at each landing site.

After conducting four SRAs, the risk levels in this example are as follows: Landing Site 1 is low risk, Landing Site 2 is high risk, Landing Site 3 is high risk, and Landing Site 4 is medium risk (Figure 8).

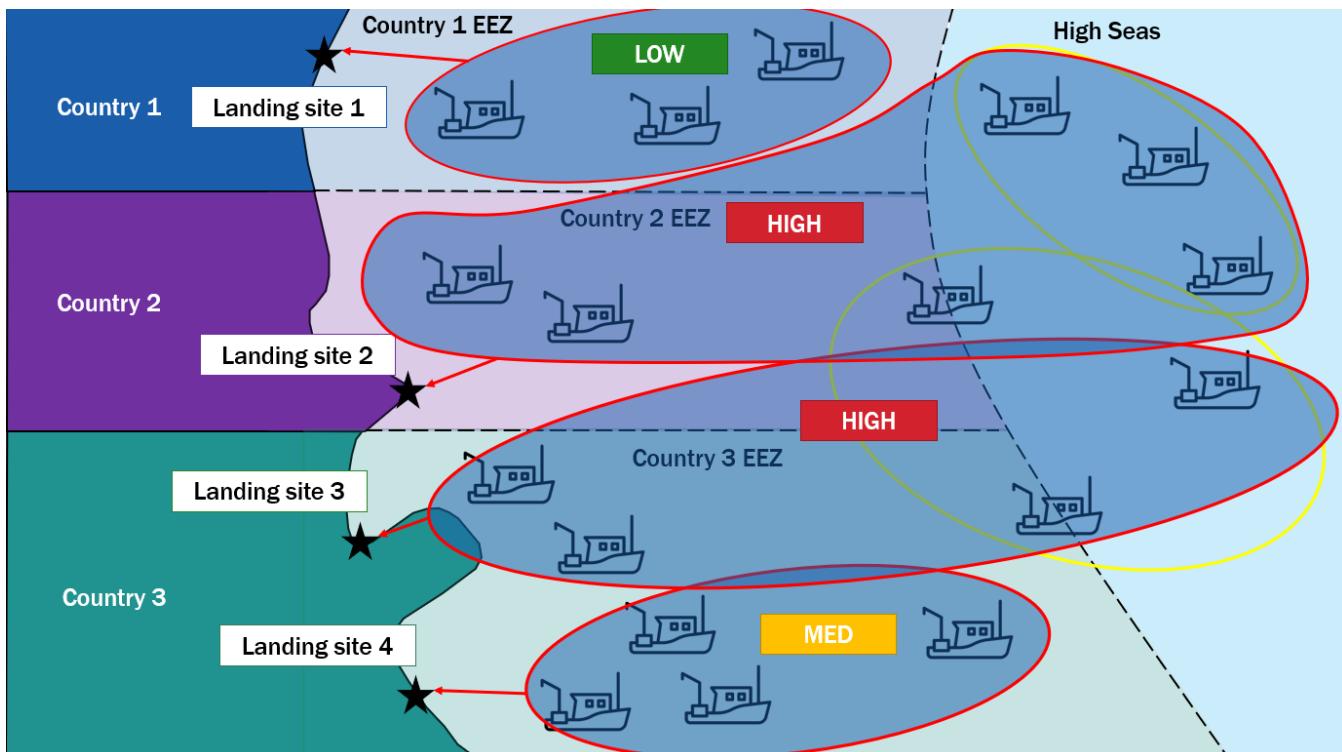


Figure 8: SRA results for UoAs defined by landing site.

Following the assessments, perhaps you suspect the vessels operating in the high seas have additional risks that are different from those that strictly fish within their respective EEZs, and you want to know more. You could therefore define the UoA according to jurisdiction, while maintaining the regional differences in Country 3 (Figure 9).

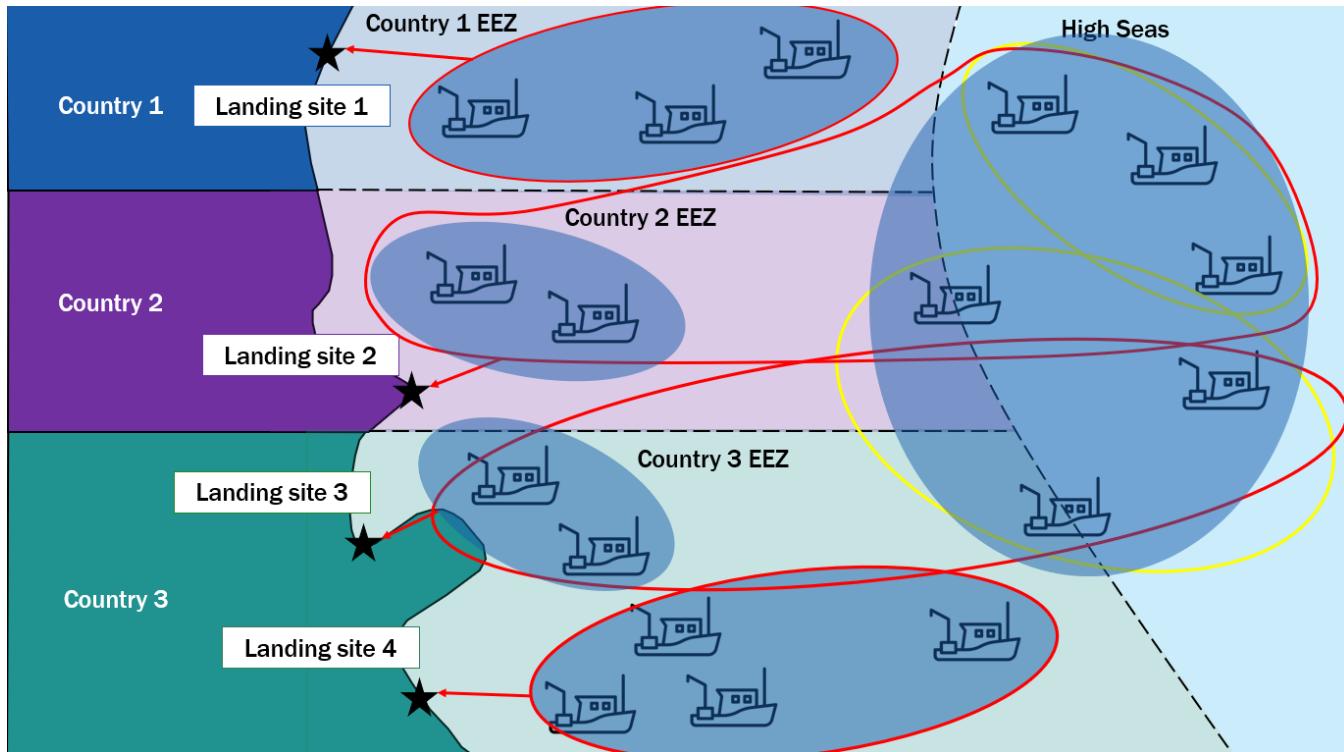


Figure 9: Defining UoAs according to jurisdiction (national jurisdiction within each country's EEZ and the RFMO in the high seas).

Another SRA is conducted for the new UoAs the following year; results in this example are as follows: Vessels in Country 1's EEZ and vessels in Country 3's EEZ at Landing Site 4 did not change risk levels (low and medium, respectively) (Figure 10). However, the vessels in Country 2's EEZ now score a low risk level. The vessels fishing within Country 3's EEZ at Landing Site 3 also score differently, as medium risk (Figure 10). When these EEZ vessels were previously grouped together with the high seas vessels they were scored as high risk.

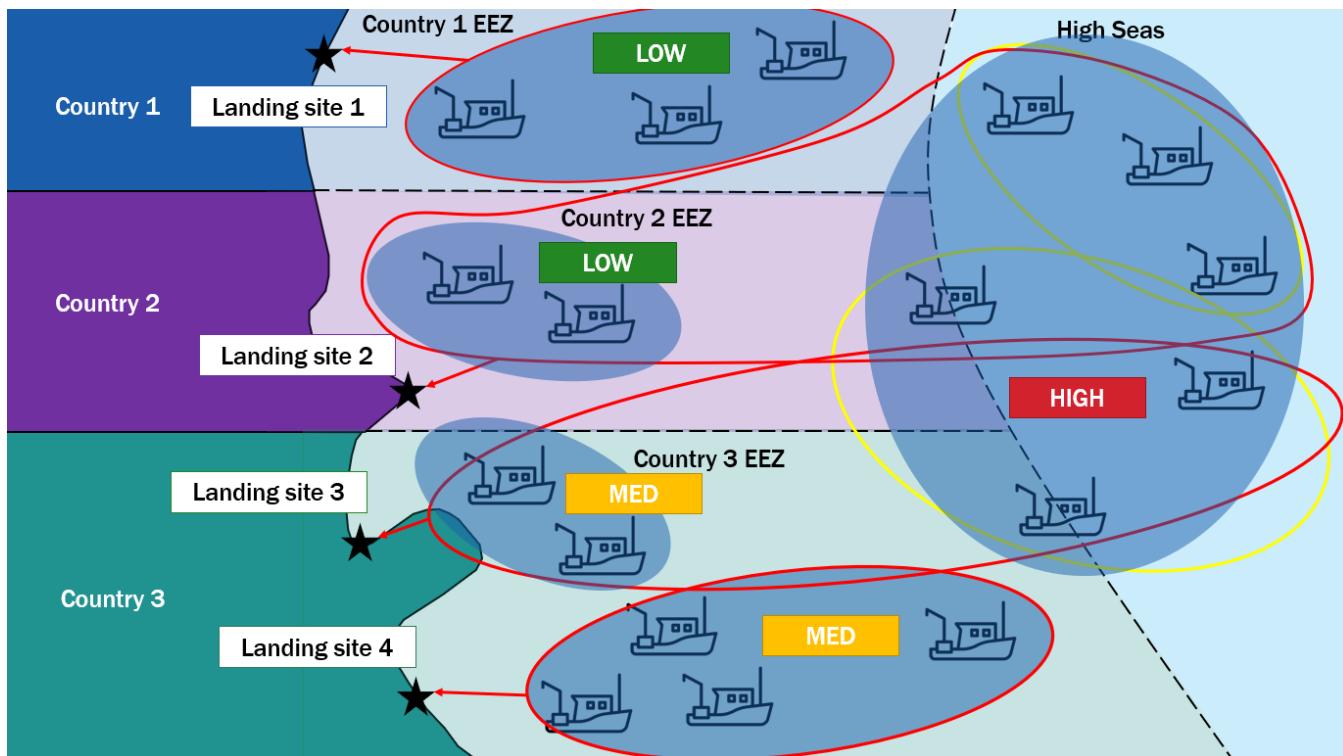


Figure 10: SRA results based on defining the UoA by jurisdiction (national jurisdiction with each EEZ and the RFMO in the high seas).

Due to the high risk found in the high seas vessels, it may be helpful to further pinpoint improvement efforts and therefore better understand if flag state may be playing a factor in risk scores. Dividing the high seas UoA into two UoAs for each of the flag state groupings will help facilitate this (Figure 11). SRA results show the vessels of one flag state face a higher level of risk than the other high seas vessels (Figure 11).

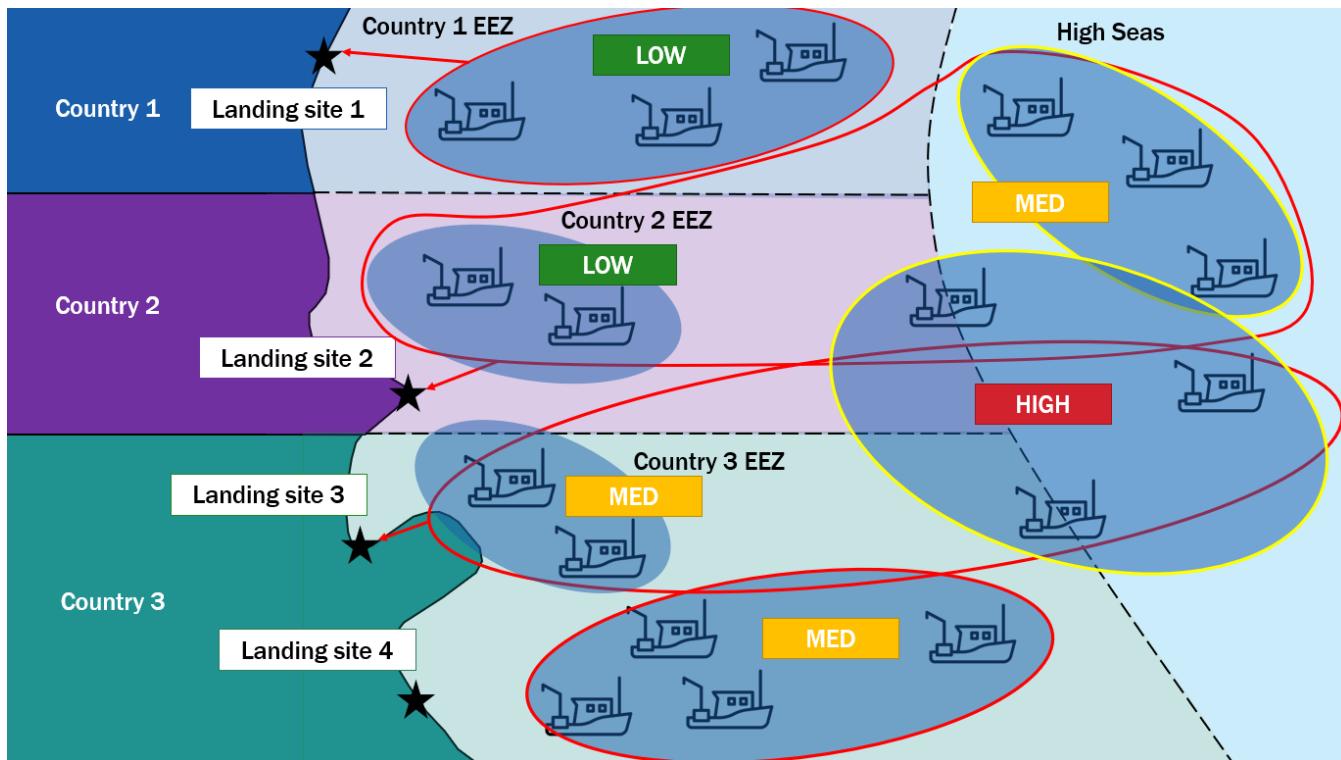


Figure 11: Defining the UoA according to jurisdiction, including the high seas, and according to flag state of the vessels in the high seas, along with the SRA results for each UoA.

In this example there are three different ways to define the UoA. The first method targeted individual landing sites (Figure 8). The second method focused on jurisdiction (Figure 10), and the third method further divided the high seas jurisdiction by flag state (Figure 11). Figure 11 pinpoints a segmented group of vessels with higher social risks than the other UoAs; each method of determining the UoA can provide different information about social risk. Each method will provide useful results, depending upon how the SRA will be used by interested parties. This is explained in further detail in Section 3.2 of this document.

## 4.2 Example 2: Management Entity

See Legend in [Figure 1](#).

A supplier has taken interest in the seafood sourced from this area and is working with the management entities to assess social risk and communicate it to potential buyers. Initially, risk was assessed according to landing site (Figure 7). The supplier planned to stop sourcing from landing sites that received a high level of risk. Unfortunately, to meet buyer demand, only sourcing from Landing Sites 1 and 4 (Figure 8) does not provide them with enough supply.

The supplier decides to pinpoint which management entities need to improve their risk levels and which are performing well. In this example, there are five companies operating fishing vessels (Figure 12).

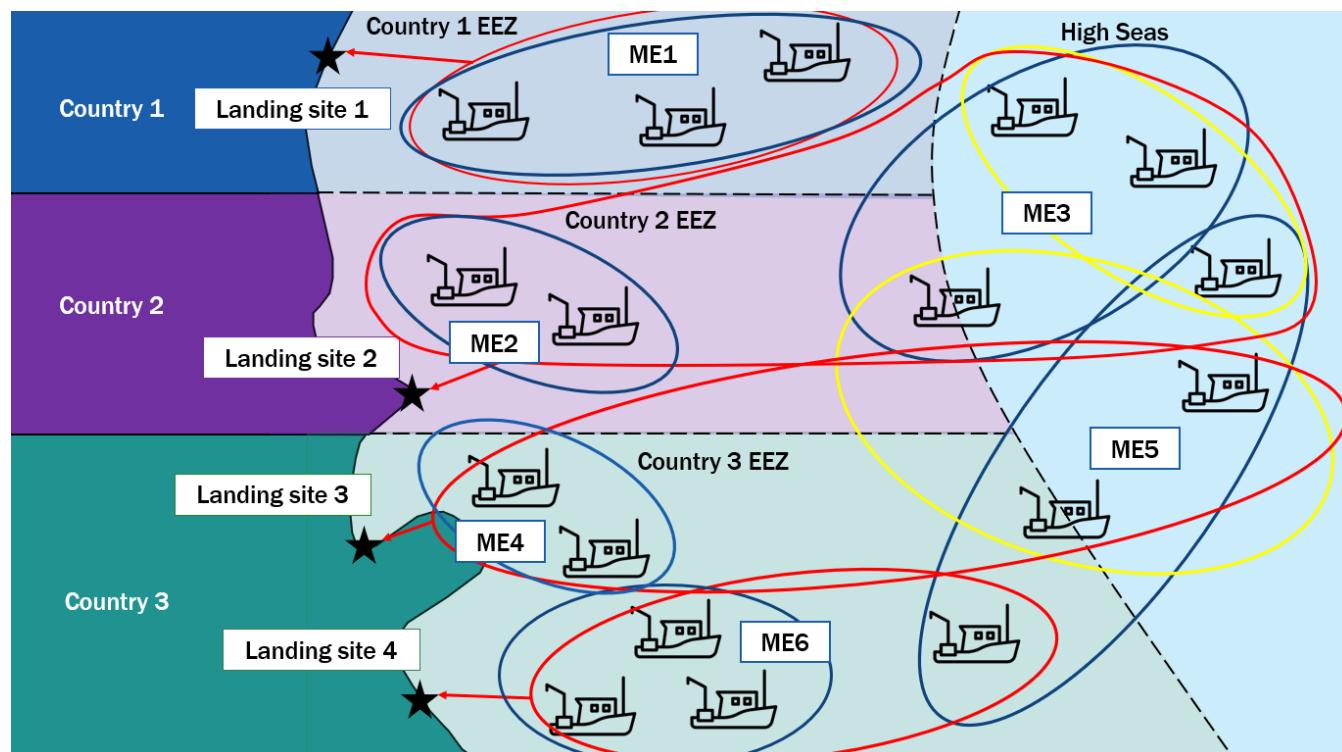


Figure 12: Management entities operating in this fishery are outlined in blue.

Each management entity has its own employee policies and procedures, and the supplier holds each management entity accountable for its own actions. The supplier has some funding to support improvements where needed to ensure sufficient supply to meet the buyer's demand. Because each management entity is accountable for the labor practices on their respective vessels, and changes will need to be made at a management entity level, the UoAs are defined according to management entity (Figure 13).

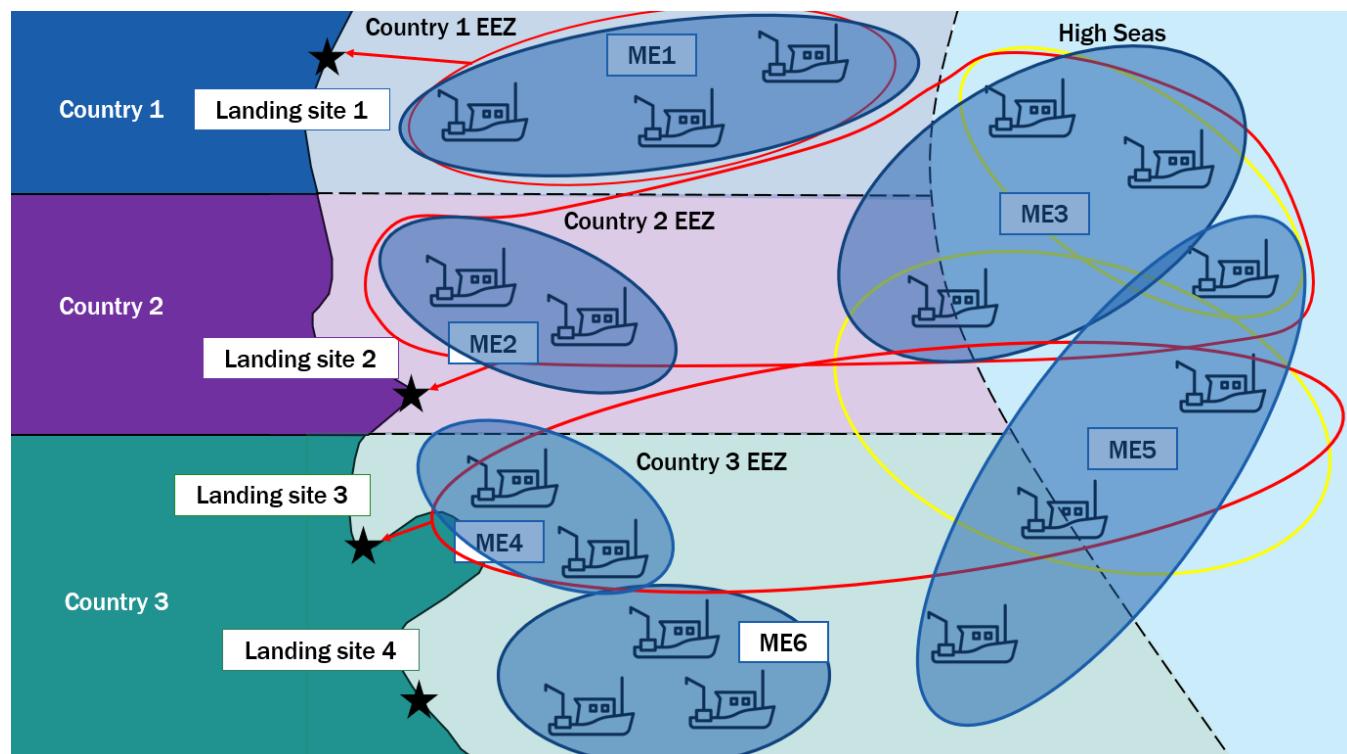


Figure 13: Defining UoAs according to management entity.

## 5 APPENDIX

### 5.1 Guidance for UoA with Multiple Management Entities

It is best practice when there is a UoA with multiple management entities to establish a formal agreement that outlines each entity's commitment, responsibilities and decision-making authority, accountability, cost/financing of the SRA, conflict resolution, and entry/exit processes. This agreement may be in the form of a contract or memorandum of understanding (MoU). The following are key factors that should be clearly addressed in an agreement:

Contract element	Description
<b>Commitment</b>	Each entity that is part of the MoU should commit to making changes designed to reduce risks and improve SRA scores.
<b>Responsibility/Decision-making</b>	Who is responsible to do what – for example, it may be helpful to have a single point person be responsible for coordinating the SRA for the entire UoA. It is recommended the entities work together to find an individual who is independent and impartial.
<b>Accountability</b>	There should be clear guidelines around what transpires should a participating entity refuse to make necessary improvements, hindering the entire UoA's ability to reduce risk. This ensures that all entities within the unit are aligned and held accountable for findings revealed at their sites during an assessment.
<b>Cost/SRA Financing</b>	There are costs associated with implementation of the SRA. Each entity should contribute to the assessment costs, however costs associated with meeting SRA indicators should be borne by the entity implementing them.
<b>Conflict Resolution</b>	There should be a clear process for how conflicts between management entities can be resolved to ensure consistency and prompt resolution.
<b>Entry/Exit Processes</b>	There should be a clear exit process for a management entity who no longer wishes to participate in a UoA to which they have formally joined. Likewise, there should be a clear entry process for new management entities to join the UoA.