



Comments on FAO Guidance on social responsibility in fisheries and aquaculture value chains

July 19th, 2019

CAOPA and CFFA appreciate the efforts of FAO to associate stakeholders, including industry, fishworkers associations and civil society in the discussions on the *FAO Guidance on social responsibility in fisheries and aquaculture value chains*.

We have a serie of comments, related to the general approach and structure of the document. As they are quite fundamental, it's difficult to introduce them, as suggested, in the text proposed on internet.

We are therefore sending them as a stand alone contribution.

COMMENTS ON THE GUIDELINES

Generally, we find that the approach proposed is not appropriate as a guidance to artisanal fisheries, particularly in developing countries :

- Although there is acknowledgement of the importance of the artisanal sector in the introduction, the provisions laid out in the Guidance exceed the capacities of most artisanal fisheries value chains operators, and do not meet the specific needs of artisanal fisheries value chains (often informal) and businesses, particularly women. As it is, we feel the Guidance will mainly be of use to industrial companies.
- (Industrial) companies are seen in the Guidance as being the only acting stakeholder, with the fishworkers themselves being seen as passive recipients. We



feel that, for the artisanal sector, the objective of such guidance should be the empowerment of all fishworkers, men and women, involved in value chains.

- The guidance also ignores that many elements that will determine the well being of fishworkers, and improve social sustainability, depend on governments (like access to fish resources, access to basic services –drinking water, electricity, sanitation, etc).
- In our view, the Guidance doesn't cover all the upstream and downstream operations included in artisanal fisheries value chains, from input supply (boat builders) to production, post-harvest handling, processing, transportation, marketing, distribution, and retailing. In particular, attention is lacking to the specific issues faced by women in artisanal fisheries value chains.
- We also feel the approach proposed will be mainly used by companies that are already willing to act/have taken some action to improve social sustainability, as a way to have their efforts recognised, may be through a system of 'social certification'. This is problematic, as this does not take into account the potential negative social and environmental impacts a company may have on the wider environment, which may affect negatively artisanal fishing operations taking place in that environment, as well as food security of local populations. For example, a fishmeal company in West Africa that takes steps to improve the working conditions of its workers may end up being certified as 'socially sustainable', when its actions contribute to both depleting small pelagic resources in the region, and jeopardising the food security of local populations, by redirecting the flow of fish caught from artisanal fish processing, destined to human consumption, to fishmeal production.

SUGGESTIONS FOR THE STRUCTURE

However, given the important social aspects of artisanal fisheries value chains, recognised in the FAO Voluntary Guidelines for securing sustainable small-scale fisheries in the context of food security and poverty eradication (VG-SSF), and the fact that in many countries, particularly developing countries, men and women from the artisanal sector are



the majority of fishworkers, artisanal fisheries should also be provided with guidance on social responsibility. A **specific guidance** should therefore be developed on artisanal fisheries. The reference for that should be the VG-SSF, in particular (but not only) chapter 6 on social aspects, as well as, the ILO Convention C188 on work in the fishing sector, which also covers fishers from the artisanal sector. The guidance should be a tool to help all stakeholders implement these instruments, through national/regional multistakeholders action plans, in a way that empowers men and women from the artisanal fishing sector.

Such Guidance would be useful for governments in promoting socially responsible value chains by helping them use these internationally accepted instruments to improve their national legislation and actions, and support efforts undertaken by the workers in the artisanal fisheries value chains.

In that sense, a number of fundamental provisions (that are missing in the current draft Guidance) should be introduced, including: tenure rights, responsible resource management, adaptation to climate change, fight against sea pollution, promotion of food security.

The artisanal fisheries value chains are much more diverse, with multiple linkages, than industrial value chains (fishing, carrying bags of fish from the pirogue to the shore, scaling the fish, cutting it in pieces, processing, transporting it, etc are all different operations performed by different people). It's important that the whole value chain, ie all these operators, are identified and taken into account when looking at the guidance.

The guidance should also pay a particular attention to women in artisanal fisheries value chains, as the issues they face to improve the social sustainability of their work are quite specific.

During the dialogue discussions, some participants felt having a specific guidance on artisanal fisheries would raise the issue of determining whether a value chain stakeholder was artisanal, or industrial. We don't consider this is a problem, as we feel each stakeholder will himself/herself decide which suggestions apply to herself/himself/her/his company. We therefore don't believe there is a need for an external body to classify participants to the initiative as artisanal or industrial, in order to evaluate them, according to a set standard, in view to measure the attainment of social responsibility. Rather, we feel that improvements in social responsibility will be made by



participating communities themselves, through their organisations initiatives. In that context, the guidance should promote best practices and be reviewed periodically, so that the standard is adapted to include innovative best practices put in place by the fishing communities organisations.

Some aspects that we would like to see in the artisanal fisheries section:

Human rights and dignity

- Improving access to education in fishing communities, in particular of children and women
- Improving social security coverage for all fishers and women in fisheries
- Sanitation on board – that will contribute not only to better hygiene, but will also help women access fishing jobs - the fact that there is no toilet on board is a big obstacle for women to embark on artisanal fishing boats

Labour rights

- Health and safety on board. The central role of artisanal boat captains should be recognised. The captains should be trained to improve their navigational skills, to keep a list of crew members, to ensure all crew wear a life jacket, to give the first aid if there is an accident on board, etc)
- Promotion of the wearing of life jackets and national programmes to ensure everyone, man or woman, taking to the sea, has access to a life jacket.

Access to justice

In the event of a collision at sea with an industrial vessel or when a trawler destroys artisanal fishing nets, there should be a possibility of compensation or even legal action.

Fishing communities should also be able to access justice when their access to fish is threatened by industrial exploitation, whether at sea or on the market - for example when women fish processors are deprived of raw material by factories producing fishmeal.



Transparency, consultation and participation

Support should be provided to professional organisations of men and women from the artisanal fishing sector that are representatives, independent, working in a transparent democratic way.

Laws and relevant information on social issues should be available in a format accessible to fishing communities.

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