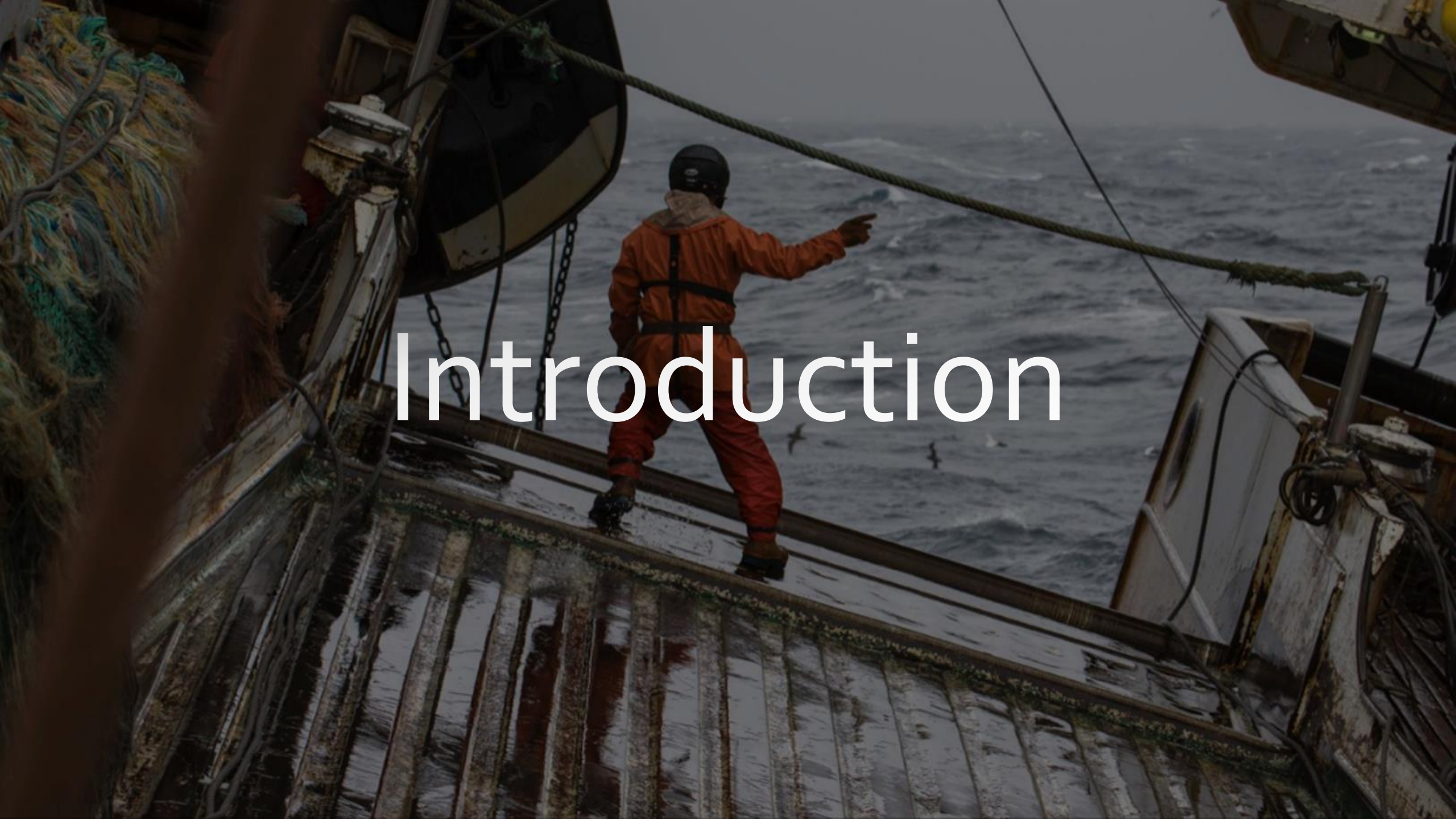




Use of at sea assessments to determine compliance with welfare, labour and safety standards

Presenters: Kimi Mackey and Thomas Franklin

A person wearing an orange jumpsuit and a black helmet stands on the wooden deck of a ship, pointing towards the ocean. The ship's deck is wet and shows signs of wear. In the background, the ocean is choppy with whitecaps, and several birds are visible flying over the water. The ship's structure, including ropes and a large black and white object, is visible on the left side of the frame.

Introduction

Introduction

The problem

- Highly dangerous occupation
- Long time spent at sea
- Widespread reports of human rights abuses
- Links with human trafficking and other international crimes
- Little or no capacity building or investment
- Nature of work means it is difficult to fit into standard agreements and historically not covered by them
- Opaque employment and responsibility arrangements

Introduction

The solution?

- International and binding agreements
 - ILO work in fishing convention C188
 - STCW-F – Safety of Fishing Vessels
 - Universal Declaration of Human Rights
- Voluntary schemes and certifications
 - Sustainable certifications may include requirements for labour standards
 - AENOR Atun de Pesca Responsable
 - The Fish Standard
- Regional agreements implemented through RFMOs
- Internal supply chain assessments of performance against bespoke standards

Introduction

Limitations

Standards are only as effective as the compliance.

- No established protocols for the assessment of compliance by flag states
- Unclear jurisdiction and remit of port and coastal states
- Differences between fleets
- Conditions very different in port
- Lack of visibility of what goes on at sea
- Often dependent on cooperation and coordination with vessel operators to be effective

At sea assessments

- Assess vessels against standards which cannot be determined in port
- Ground truthing of in port assessments
- Realtime view of performance while at sea



Development of methods

Objectives

- Develop requirements
- Cooperate with vessel operators
- Establish red lines
- Not place crew in increased danger
- Minimise impact on vessel operations
- Develop corrective actions/ roadmap for improvements

Considerations

- Type of fishery and inherent risks
- What type of assessment and what is possible
- Weaknesses and mitigations to be taken
- Develop methods and guidance for consistent evaluation
- Prioritize criteria to be assessed considering timeframe available
- Assessor safety

Met	Observation	Part met	Not met	Critical	No information available / not assessed
Conformance with all applicable regulations and best practice	Conformance although improvements could be made	Measures have been implemented but still not satisfying requirements	No measures under taken	Clear non-conformance for "red line" criteria	Either no time available or not applicable for at sea assessment
No action	To be reviewed at the next assessment	Corrective action plan required	Corrective action plan required	Advise that business with vessel operator cease	No action

Implementation

- Coordinate with vessel operators and establish agreed protocols, lines of communication and reporting for the assessments
- Establish “Sensitisation document” introducing programme objectives and assessor role in language of vessel officers and crew
- Create assessor identification
- Organise logistics and deploy assessor

Development of methods

Collecting information

1

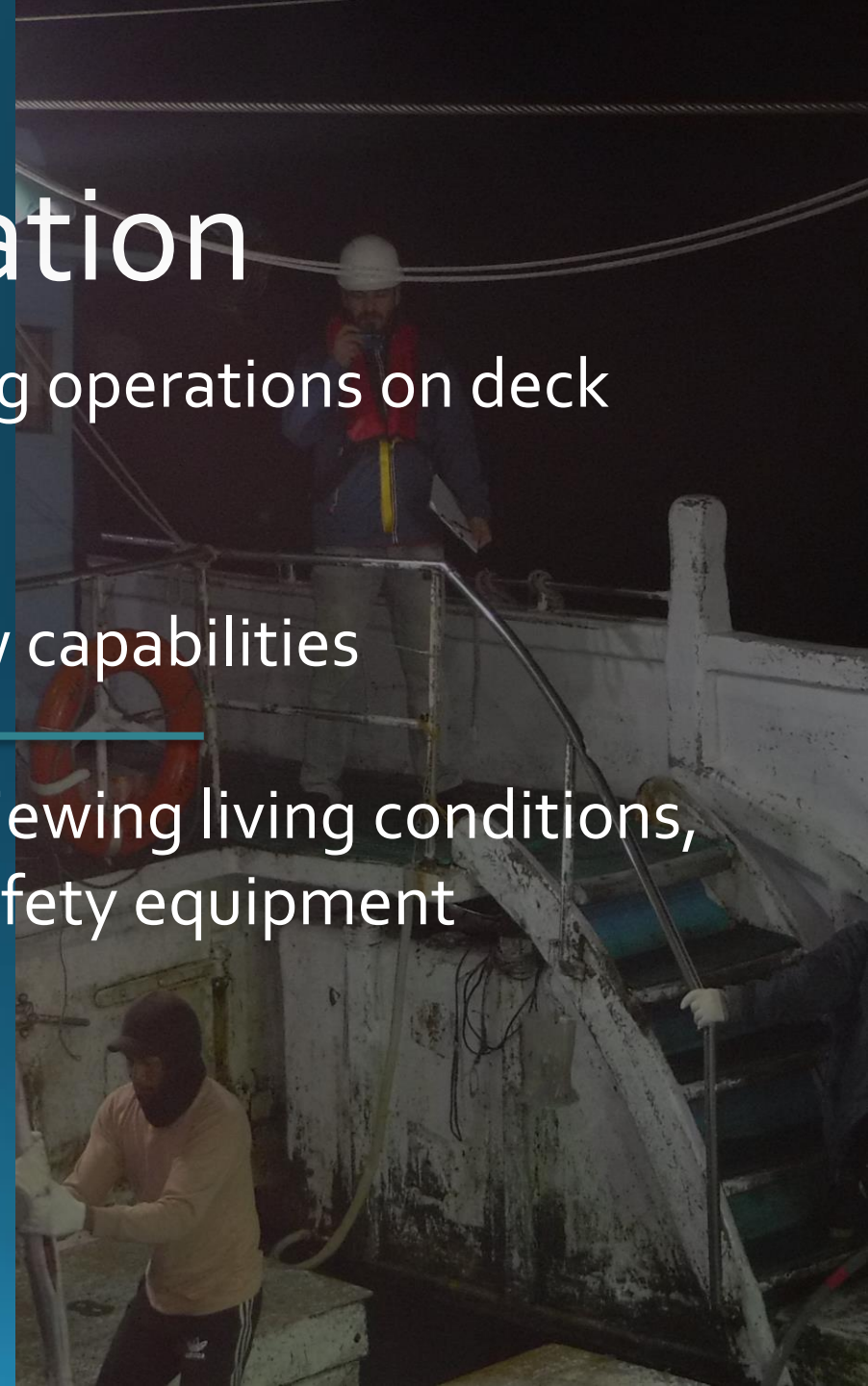
Observational – Assessor observes working operations on deck

- Occupational health and safety
- Working hours
- Interactions between crew and crew capabilities

2

Vessel tour – Assessor tours the vessel reviewing living conditions, information boards, subsistence, vessel safety equipment

- Crew welfare
- Vessel safety
- Crew training
- Collective bargaining / fisher unions



Development of methods

Collecting information

3

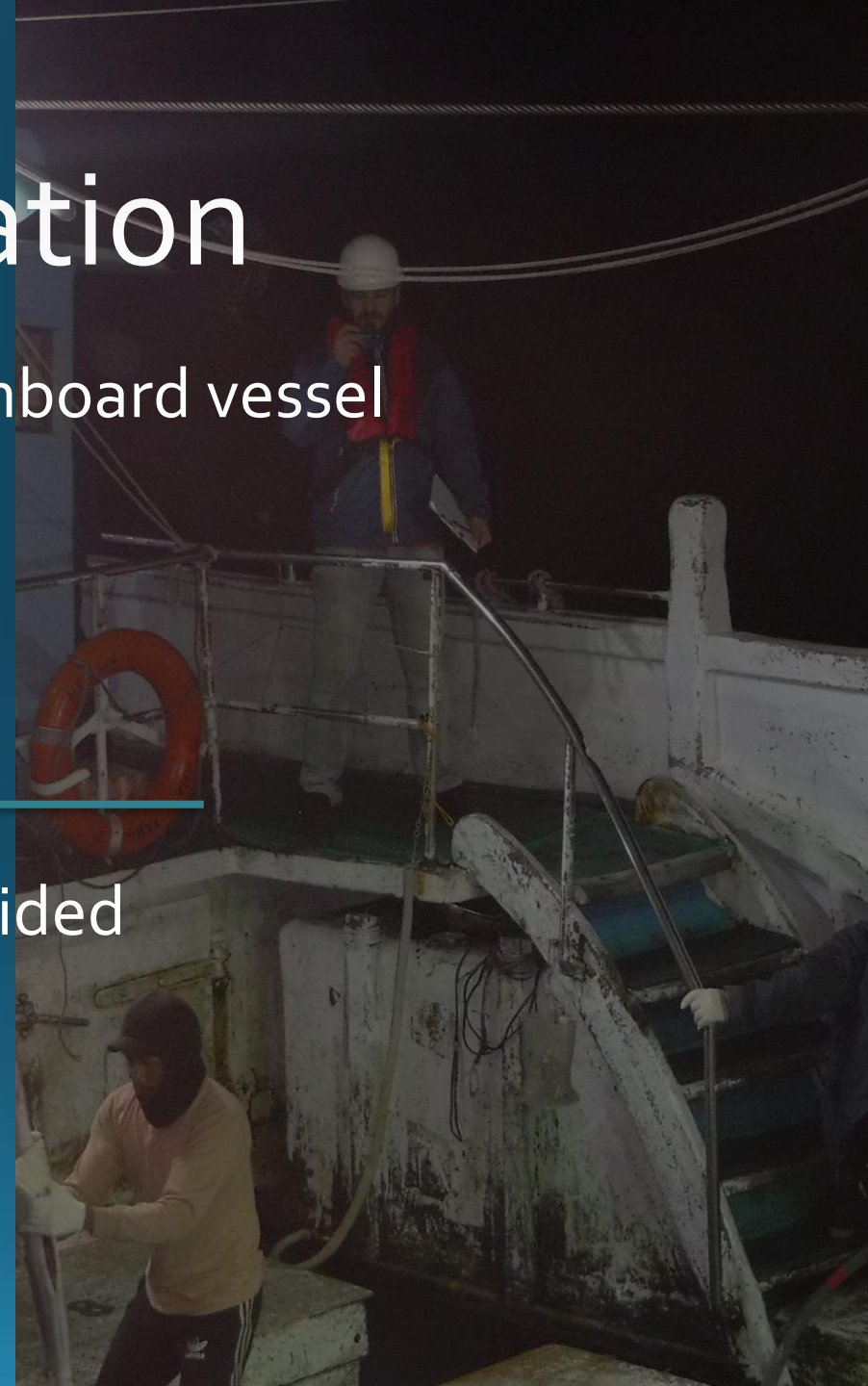
Document review – Reviews documents onboard vessel

- Crew lists
- Illness and injury reports
- Operating procedures
- Safety certificates

4

Conversations – Formal interviews are avoided

- Crew welfare
- Remuneration
- Working hours
- Crew respect and dignity





Case Study: Thai Union

Who is Thai Union?

- One of the world's largest seafood producers
- Not a vessel operator - works closely with suppliers to drive continuous improvements through the TU Fisher Work and Welfare Program
- Fisher Work and Welfare Program
 - > Vessel Code of Conduct and Vessel Improvement Programme
 - > 12 Fundamental Principles



12 Fundamental Principles

1. Business is conducted lawfully and with integrity
2. Work is conducted on the basis of freely agreed and documented terms of employment with legal compliance
3. All workers are treated equally and with respect and dignity
4. Work is conducted on a voluntary basis with no forced or compulsory labour
5. All workers are of an appropriate age
6. All workers are paid fair wages
7. Working hours for all workers are reasonable
8. All workers are free to exercise their right to form and/or join trade unions and to bargain collectively where permitted by law
9. Workers' health and safety are protected at work
10. Workers have access to fair procedures
11. Business is conducted in a manner that embraces sustainability and reduces environmental impact
12. Progress and compliance are monitored

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Case Study: Thai Union

Implementation:

- Checklist of criteria based on the 12 principles
- MoU in place between MRAG, TU and the supplier vessels
- Coordination for assessor mobilisation and logistics
- Assessor boarded the carrier vessel in port



Case Study: Thai Union

Overview:

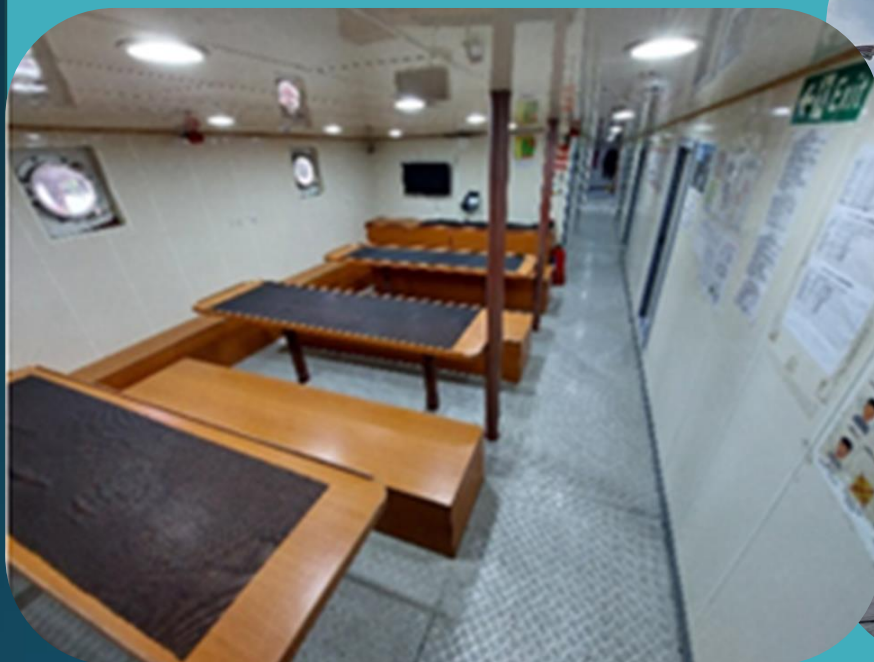
- Auditor boarded and assessed 19 vessels for 2-3 hrs during transhipments over four weeks.
- Use of vessel inspections and tours, review of paperwork and observations of working practices during transhipments
- Vessels provided with basic summary of findings
- Good cooperation from participating vessels



Selected outcomes

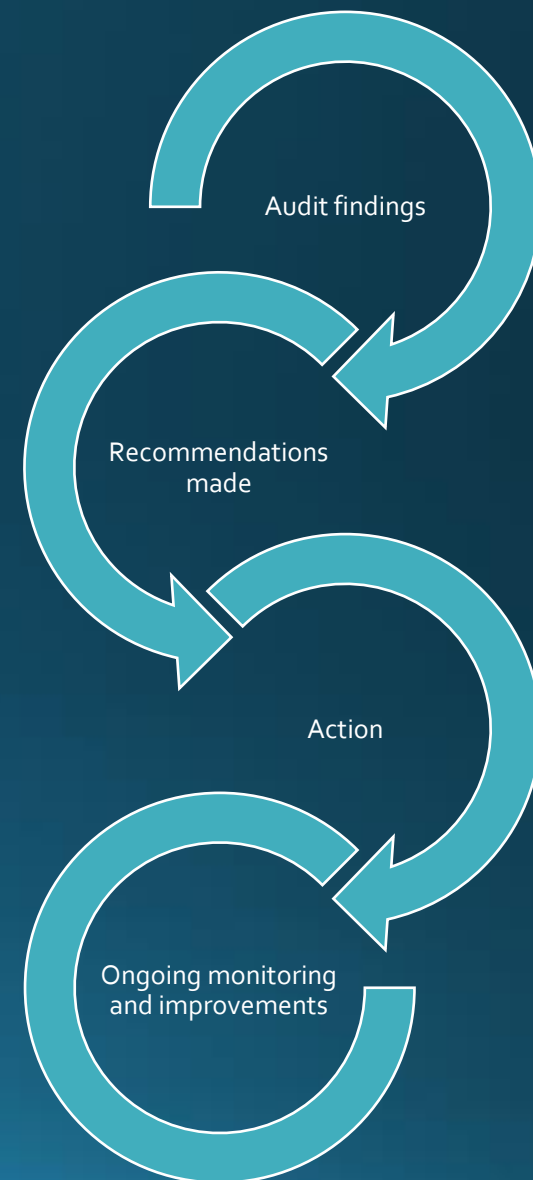
Improved living conditions

Issue: Crew living conditions were unclean, often with no mattresses or privacy



Action: New mattresses, bedding, pillows and curtain dividers have been provided to all crew members.

All vessels were fumigated in port and new paint work and general renovation completed



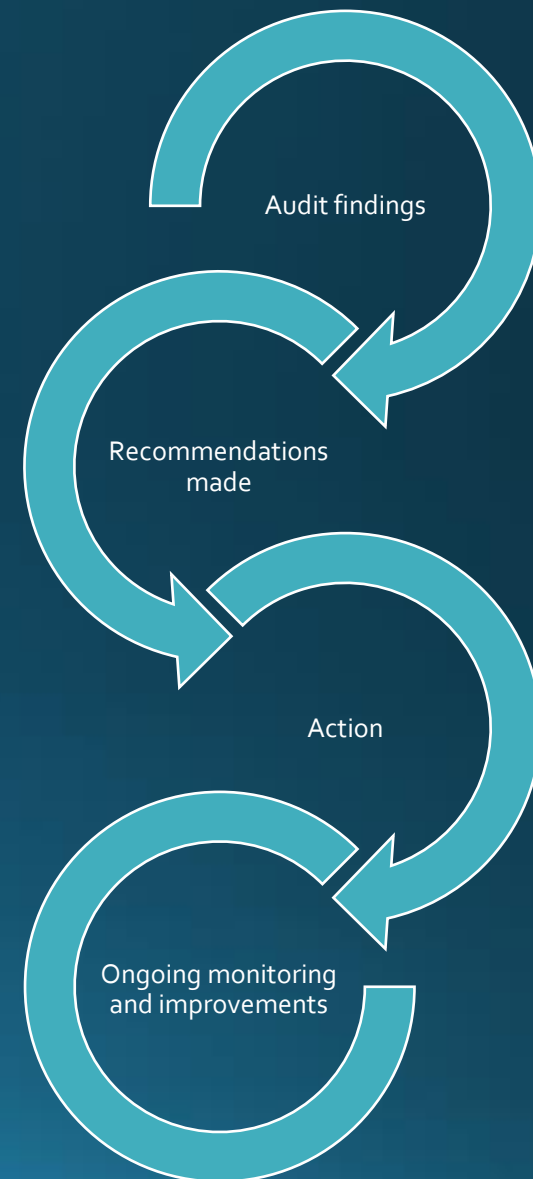
Selected outcomes

Improved communications

Issue: Crew did not have access to WIFI for personal communication



Action: A Wi-Fi trial has been developed and is ongoing to give crew members access to communication whilst at sea. Results will be analysed, and further improvements made once the vessels have returned to port and the Wi-Fi survey has been completed by the crew and vessel owner. Wi-Fi is also intended to be for health and safety assistance if crew need immediate support from a health care professional.

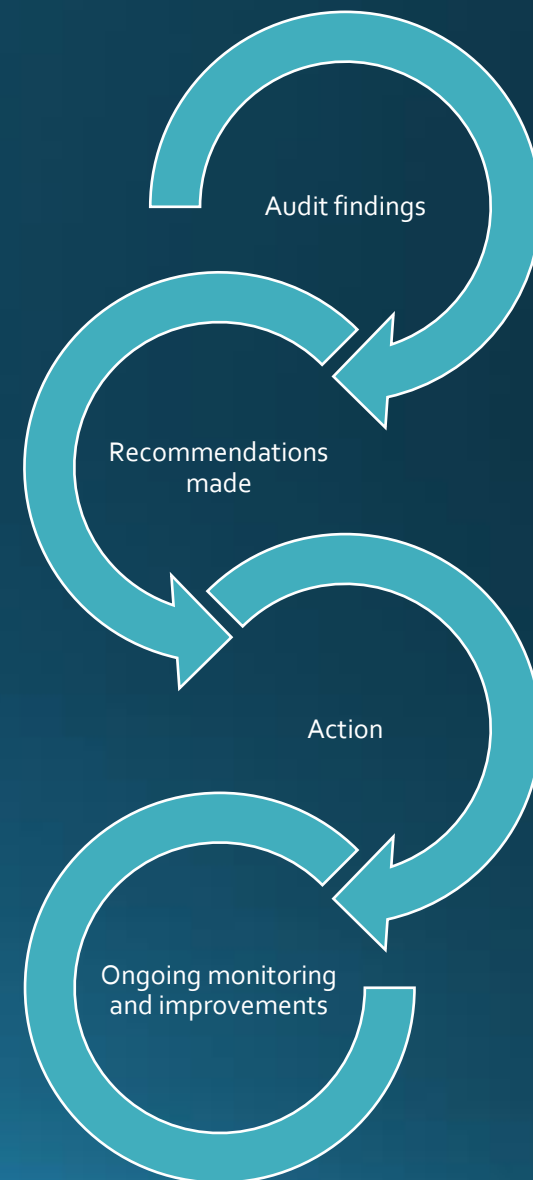


Selected outcomes

Safety training provided

Issue: Lack of understanding of safety procedures and use of PPE

Action: Safety training provided and new health and safety policies and risk assessments provided to crew members, including how to use Personal Floatation Devices, first aid, man overboard, and use of PPE.

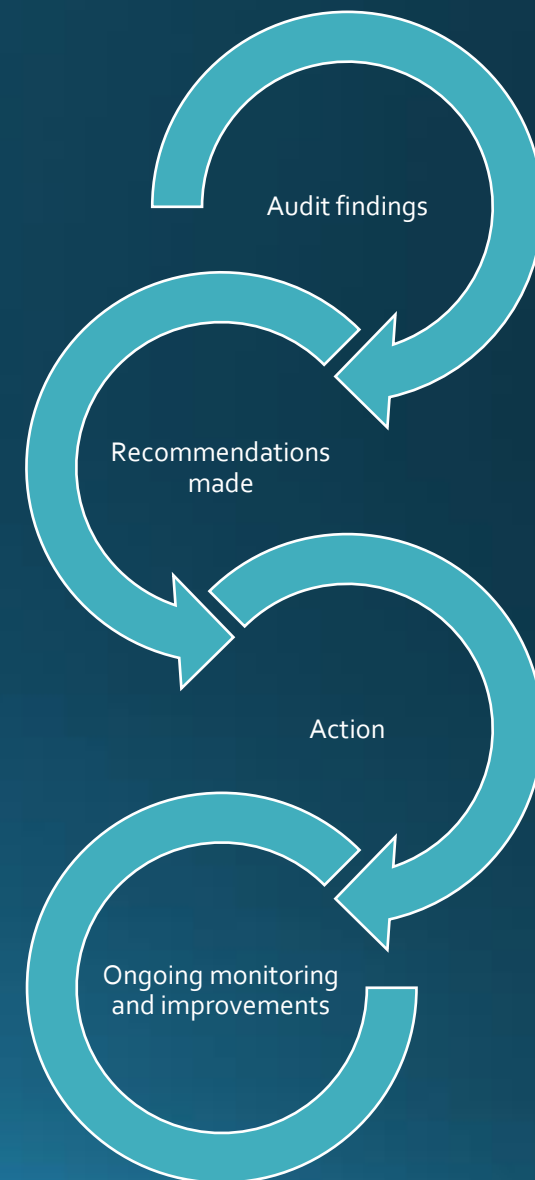
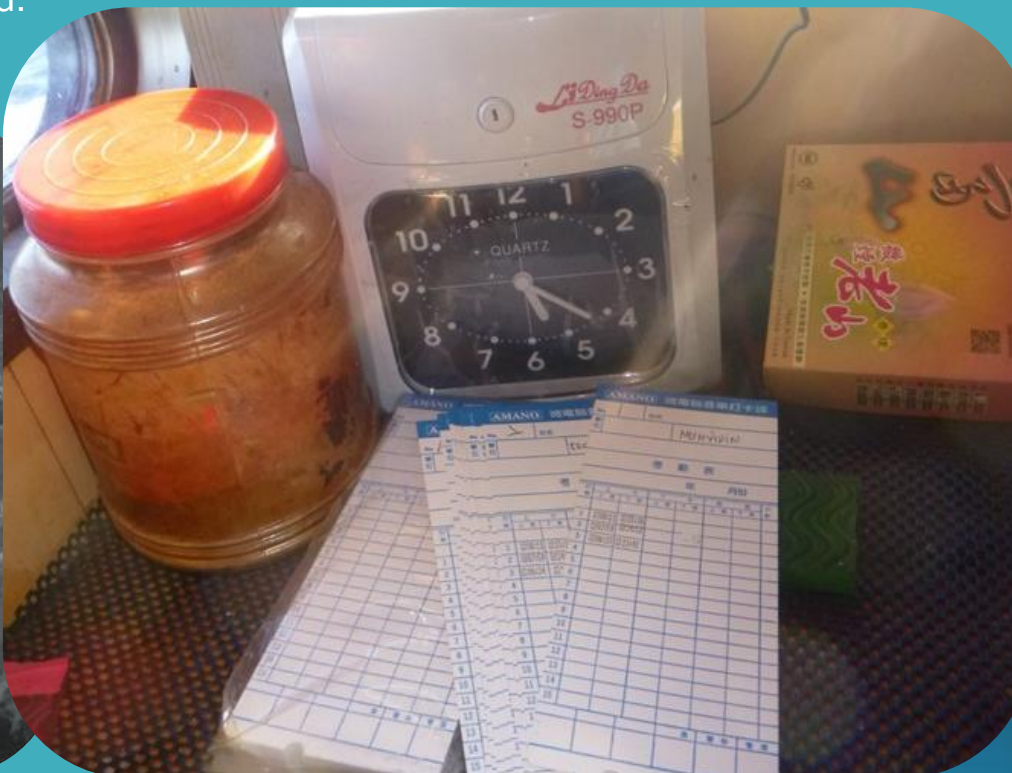


Selected outcomes

Working conditions

Issue: No clear records of working hours on some vessels, others with very limited rest hours

Action: Vessel owners have implemented a clock in and clock out system on board the vessels whereby the crew manage their own records of working times by using a clock punch system. Each vessel has been allocated one and the captain and crew informed of how to use it, with records assessed at trip end.



Case Study Summary

- Implementation of several corrective actions observed
- Operators are observing benefits
- Still some way to go, continuous improvement expected
- Good opportunity to determine which aspects are better assessed in port or at sea according to this experience
- TU intend to repeat the process and continue with improvements into the future
- Learning process for all- checklist refined and adjusted, looking to better target requirements for improved fisher welfare

Case Study: South Atlantic squid jigging fishery

- Season occurs February to May - national and international waters
- Fleet has experienced catastrophic issues in the past
- Assessors requested and funded by the licensee holders
- Assessor also has an advisory role
- Limited to operations within coastal state EEZ
- Proximity to port and other vessels allows transfers between vessels
- Longer assessor deployments (7-14 days)



Selected findings and outcomes



- All vessels are required to have internet access for crew.
- Crew have pre-season safety training
- Pre-season safety and welfare inspections carried out
- Some vessels show marked improvement
- Daily reporting on crew welfare and possible illnesses
- Attitudes to safety start with the officers and senior crew
- High risk activities carried out

Selected findings and outcomes

Jigger arms

Issue: Crew working on jiggering arms often do so without the correct equipment or use equipment incorrectly – risk of death

Root causes:

Crew are often under pressure to act quickly. Sometimes it is only for a short period and not deemed “worthwhile”.

Crew are not adequately trained in the use of the safety equipment.



Action:

Short term

Assessor discussed with bosun, captain and crew to reiterate the correct use of safety equipment and the use of this is mandatory.

Provide fall arrestors, harnesses and lanyards to all crew. Train in the correct use of this.

Long term

Provide regular documented training to all crew on the correct use of safety equipment

Selected findings and outcomes

Seawater showers

Issue: While freshwater showers are installed, often only sea water shower and wash facilities available – skin disease and general hygiene

Root causes:
Vessels have limited freshwater production capacity
Saltwater showers, basins and washing machines used widespread

Action:

Short term	Medium term	Long term
Assessor discusses with Captain and engineer to ensure freshwater wash facilities are available at least at specific times of the day, for all crew.	Installation of timed taps so that freshwater is not wasted.	Increase freshwater capacity production (often limited by design of the vessel)
Develop shift pattern for use of washing facilities	Remove saltwater pipes and replace with freshwater.	Provide industrial washing machines with fresh water supply.
While onboard continues to monitor these remain available.		



Selected findings and outcomes

Lifesaving equipment

Issue:

Lifesaving equipment on board but often stowed or tied down once at sea, so not available for use in case of emergency. May be poorly maintained.

Root causes:

General poor attitudes to safety
Lack of space
Not wanting to wear out equipment by using it

Action:

Short term

Ensure lifesaving equipment remains available for use in emergencies.

Medium term

Training on correct storage and maintenance of lifesaving equipment



Outcomes



- Crew appreciate being heard
- Improved attitude towards safety and welfare
 - Correct use of PPE
 - Condition of PPE provided improved
 - Access to lifesaving equipment
- Improved living standards on board
- Vessels more efficient
- Adequate thermal clothing required
- Further assessments to be carried out in 2024

Review of at-sea assessments

Benefits:

- Ground truth findings
- Observations of real conditions at sea
- Increased reach
- Reinforce to crew that issues at sea are being considered

Weaknesses:

- Safety risks to the assessor
- Crew may not feel safe to report issues
- Limited snapshot
- Logistical difficulties
- Translation and communication issues

Conclusions

- At sea assessments are a fundamental tool to assessing compliance with welfare, labour and safety requirements
- Methods and checklists can be tailored to specific needs and characteristics of the fleet and the type of assessment
- At sea assessments, and welfare, labour and safety assessments require the cooperation and involvement of the vessel operators
- Implementation of corrective actions often constrained by vessel design, lack of capacity and funding from flag state.

The future?

How can conditions be monitored

- Continued reliance on seafood suppliers to conduct supply chain assessments
- National monitoring programmes based on ILO C188
- Voluntary certification to include at sea assessments
- Regional observer programmes integrating elements of labour, welfare and safety monitoring

