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**FISHING INDUSTRY ASSOCIATION
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KEY DATA ELEMENTS
ON TRACEABILITY – SOCIAL ACCOUNTABILITY
& CREW WELFARE ON BOARD
2025

GLOSSARY



- EEZ** Economic Exclusive Zone
- EJF** Environmental Justice Foundation
- FFA** Fisheries Forum Agency
- FIA** Fishing Industry Association
- FISH** Fairness, Integrity, Safety,
and Health Standard
- GDST** Global Dialogue on Seafood on
Traceability
- GFW** Global Fishing Watch
- IFIMS**..... Integrated Fisheries Industry
Management System
- ILO** International Labor Organization
- IUU** Illegal, Unreported and
Unregulated fishing
- KDE** Key Data Elements
- NFA** National Fisheries Authority
- PNG** Papua New Guinea
- RSP** Responsible Sourcing Policy
- SFM** Seafoodmatter
- SR & CW**... Social Responsibility and
Crew Welfare (FIA PNG)
- TPJ** Trans-Pacific Journey
Fishing Corporation
- TSP** TSP Marine Industries
- WCPFC**.... Western and Central Pacific
Fisheries Commission

Project developed in October 2022

Report written on 14th of March 2023

Project publication on 4th September 2023

Reviewed & published edition in January 2025

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EXECUTIVE SUMMARY

The purpose of this report is to present, analyze and share the inclusion of innovative Key Data Elements (KDEs) in the FIA PNG Integrated Fisheries Industry Management System (iFIMS) towards developing an assurance platform for the social accountability certification of the FIA PNG tuna fleet – built on compliance with the FISH Standard for Crew (Fairness, Integrity, Safety, and Health Standard) and the FIA PNG Responsible Sourcing Policy (RSP).

This report does not cover the tuna processing industry, as the focus is solely on work on board tuna fishing vessels. This report does not include small-scale fisheries (SSF) and vessels and is therefore not applicable for them.

- 1.** This project was initiated in October 2022 to develop an assurance model for decent working and living conditions for the crew of our FIA PNG fleet, in addition to the FISH standard for Crew certification.
- 2.** The purpose was to demonstrate control over several events, the so-called KDEs, of social accountability onboard the FIA PNG tuna fleet supported by iFIMS.
- 3.** This to reach the overall objective to implement an auditing tool that includes Social Accountability KDEs per fishing trip under the MSC certificate.
- 4.** In 2024, FIA PNG monitored working and living conditions by fleet and per fishing trip.



1. INTRODUCTION

This report focuses on good practices and innovative KDEs to improve the monitoring of working and living conditions in the FIA PNG tuna fleet. It follows the [ILO Convention 188](#), the [FISH Standard for Crew](#) and the [FIA PNG RSP Social Responsibility and Crew Welfare \(SR&CW\) requirements](#).

The fishing sector is notorious for severe decent work deficits and has come under scrutiny over the past years for the use of forced labour and child labour, as well as links to human traffickers and people smugglers. While the majority of fishing vessel operators comply with existing legal frameworks to avoid decent work deficits, the cases that have occurred tend to tarnish the reputation of the sector as a whole. This is particularly important given that the fishing industry is an important economic sector, both from food security and an employment perspective ([International Labour Organization 2016](#)).

This report examines FIA PNG's good practices, the FISH Standard for Crew certification requirements, and an innovative proposal for KDEs to foster good practices regarding working and living conditions on FIA PNG vessels.

The aim is to explore good practices and to generate the opportunity to implement our FIA PNG iFIMS platforms across the FIA PNG tuna fleet. This assurance model aims to be a tool to maintain consistency regarding labor compliance and assist us with remote and on-site audits while the fishing companies document their compliance under an MSC and FISH certificate per fishing trip.

Addressing social responsibility in the tuna fishing sector comes with challenges and opportunities. Providing KDEs per fishing company, per fishing trip, and almost in real-time (when applicable), provides credible comprehensive assurance for the full suite of social issues onboard our tuna fleet.

The current efforts under the FIA PNG RSP and FISH Standard for Crew certification contribute to the FIA PNG's good social responsibility practices and approach. As part of this project, a systematic approach is included that involves continuous monitoring, to help increase knowledge and capabilities in our tuna fleet and also among the FIA PNG staff.

2. PROCESS

In October 2022, we proposed to our tuna fleet members to assess the feasibility of adding several events in the Integrated Fisheries Industry Management System (iFIMS) as evidence of compliance with IUU regulations, the FIA PNG RSP and the FISH for Crew certification per fishing trip.

The project was kicked off on November 1st, 2022, with a project proposal and the Terms of Reference that were internally reviewed by the FIA PNG

Technical Working Group. A checklist with 31 KDEs associated with the FISH Standard for Crew and the FIA PNG RSP was subsequently developed and evaluated, and data was collected in 2023. In September 2023, this present report with the results was initially published on the FIA PNG website and has been updated in January 2025.

→ *For an update on the next steps, please consult chapter 4.*



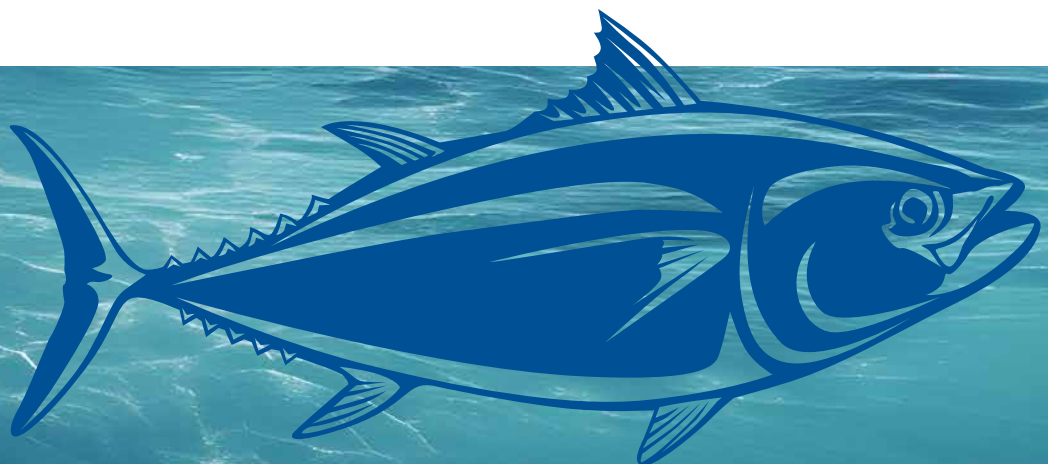
3. DISCUSSION AND ASSESSMENT

Throughout a thorough discussion and assessment of the proposed KDEs, agreements and disagreements became obvious. The discussion and rationale assessed the practicality of the KDEs, the availability and strength of the verifiable evidence, the information sources (authorities, FIA PNG, regulators), and also the needed resources to register this information in the iFIMS.

It was decided to add these KDEs per fishing trip via the iFIMS, supported by verifiable evidence, that can be available for third-party auditors and also buyers. During the meeting, all 31 KDEs were reviewed and discussed based on the feedback provided by the working group.

When there was a full consensus from the working group members, a KDE was marked as green and the verifiable evidence was captured as well as the source of the evidence (authority, RSP audits, fishing company documents). Each member of the working group had the opportunity to provide more comments and to justify their recommendation.

The following pages provide a summary of the working group comments and level of agreement for each KDE per principle of the FISH Standard for Crew. These principles also align with the FIA PNG Social Responsibility & Crew Welfare requirements, as well as requirements concerning IUU fishing.



FISH STANDARD FOR CREW REQUIREMENTS

KEY DATA ELEMENTS FOR PRINCIPLES # 1-4

PRINCIPLE # 1

Emphasize Socially Responsible Labour Practices and Ethical Behaviours

KDE # 1 – No child labor

Agreed. This is a boarding document required by PNG authorities and also a document required during the hiring process of crew members.

KDE # 2 – No forced labor

Not agreed. The reason: Lack of verifiable specific evidence (document) to prove it. Although the FIA PNG tuna fleet is low risk because of their fishing activities in the Economic Exclusive Zone (EEZ), and crew members enjoy working with the FIA PNG tuna fishing members, but there was no tangible and verifiable evidence to support this KDE initially. It was decided to review this point later after the first trial, and to consider an external and independent assessment in the future. These types of requirements are verified by crew interviews most of the time, assessing the 11 modern slavery types:

1. Abuse of vulnerability
2. Deception
3. Restriction of movement
4. Isolation
5. Physical and sexual violence
6. Intimidation and threats

7. Retention of identity documents
8. Withholding of wages
9. Debt bondage
10. Abusive working and living conditions
11. Excessive overtime

It is important to state that this aspect is assessed during the FIA PNG SR&CW audits onboard, and also as part of the FISH Standard for Crew third-party audits.

KDE # 3 – Crew list

Agreed. A crew list is a regulatory (NFA, and fishing license) pre-requirement.

KDE # 4 – Respect the dignity of fishers

Not agreed, as there was no verifiable and tangible evidence document available for KDE support; this type of requirement can only be assessed by direct crew interviews. This aspect is assessed during the FIA SR&CW audits onboard, and also as part of the FISH Standard for Crew third-party audits.

KDE # 5 – Protect migrant fishers

Agreed. This can be proven by crew contracts that are aligned with the FISH Standard for Crew requirements and with the **ILO 188 convention**. FIA PNG disposed of this verifiable evidence, and it could be applied per fishing trip and/or on an annual basis.

KDE # 6 – Fair recruitment and placement of fishers

There was not a full agreement of a supportive document to support this KDE. However, crew contracts are a strong and initial document aligned with ILO C188 and the FISH Standard for Crew requirements to support this KDE. Also, this aspect is assessed during the FIA PNG SR&CW audits onboard, and as part of the FISH Standard for Crew third-party audits.

KDE # 7 – Provisions for repatriation

Agreed. Not everyone provided comments to support this KDE, however, crew contracts are a strong and initial document to support this KDE. The ILO C188 and the FISH Standard for Crew request that the crew contracts contain detailed information on repatriation and relevant processes. Also, this aspect is assessed during the FIA PNG SR&CW audits onboard. A crew contract was suggested as verifiable evidence of this KDE per fishing trip.

PRINCIPLE #2 **Establish Fair Conditions of Service for All Fishers**

KDE # 8 – Fishers' work agreement

Agreed. There was a comment that the FIA PNG office shall have a security process in place to avoid a security breach. It was clarified that iFIMS initially will not ask to attach the original document, but it will ask to declare that crew members have a valid contract with them, and the system will provide a template. This is verified by the FIA PNG audit team and also annually as part of the FISH Standard for Crew third-party audits.

KDE # 9 – Fair remuneration

Agreed. See comments under KDE # 8.

KDE # 10 – Freedom of association and collective bargaining

Agreed. However, there is no strong documented evidence in place besides the FIA PNG member companies' policies and the FIA PNG RSP. It was recommended to not add it initially as this point is verified by interviews onboard by the FIA PNG audit team and by third-party audits.

KDE # 11 Non-discrimination in employment

Agreed. The company's public policy for employment and the RSP Social Responsibility & Crew Welfare procedure serve as proof.

KDE # 12 Social security

Agreed. See comments above under KDE # 8.

KDE # 13 Health protection and medical care

Agreed. This is part of the crew contracts and controls are available onboard.

KDE # 14 Fishers' compensation system

Agreed. This KDE was added because the compensation description is part of the crew contracts.

KDE # 15 Grievances

This KDE is a challenge and difficult to add to the iFIMS system as a real-time KDE, as each trip is different, and the crew can experience comfort and discomfort. FIA PNG members have a grievance mechanism onboard (compliant box, direct communication with captain and mates). It was agreed to explore further how to find a stronger source to support a KDE per fishing trip and to explore this aspect at a later stage in a more comprehensive manner.

PRINCIPLE #3

Ensure the Safety and Health of All Fishers

KDE # 16 Defined roles and accountability

It was agreed to explore what type of document could suit this requirement besides the IMO number of the vessel and other legal requirements that the FIA PNG members already have in place.

KDE # 17 Occupational Safety and Health - general

KDE # 18 Occupational Safety and Health - OSH review

Every year, the Fisheries Forum Agency (FFA) inspects tuna purse seine operations in the Pacific Ocean for a “good standing certificate” that ensures the fishing vessel meets FAO standards and specifications for the marking and identification of fishing vessels and is reporting automatically and in a consistent manner to FFA VMS. This FFA good standing certificate is a very effective tool for verifying that the vessel is legally operating in the Western and Central Pacific Fisheries Commission (WCPFC). In addition, the NFA through the fishing license has implemented a due diligence process to assess and audit the fishing vessel's seaworthy and safety conditions before extending a fishing license.

These 2 documents are strong evidence of compliance with both FIA PNGF RSP SR&CW and FISH Standard for Crew requirements regarding occupational safety onboard.

KDE # 19 Safety orientation and training

Agreed. This KDE was added because pre-embarking workshops that include safety orientation and training are mandatory.

KDE # 20 Rest periods and hours of work

It was decided to not add a KDE, however, it was agreed that the best way to assess this would be asking Global Fishing Watch (GFW) to assess the possible resting periods in the FIA PNG tuna fleet. This is verified by interviews onboard by the FIA PNG audit team and by third-party independent auditors.

KDE # 21 Fitness standards and medical exams

Agreed. The medical certificate is available per crew and per fishing vessel and trip and an therefore easy to add.

KDE # 22 Medical treatment

Not agreed. It was established that this requirement would better be assessed by interviews onboard as complementary to the health status and medical certificate.

PRINCIPLE # 4**Provide Decent Accommodations,
Water and Food**

This principle contains 9 requirements that could result in 9 KDEs. It was decided to summarize based on 2 supportive documents that are generated on an annual basis to justify these KDEs per fishing trip.



KDE # 23 A Framework for oversight

KDE # 24 Accommodations are appropriate

KDE # 25 Spaces are well maintained

KDE # 26 Spaces are comfortable and safe

KDE # 27 Sanitary facilities are provided

KDE # 29 Galley and other facilities – galley and food storage

KDE # 30 Galley and other facilities - communication

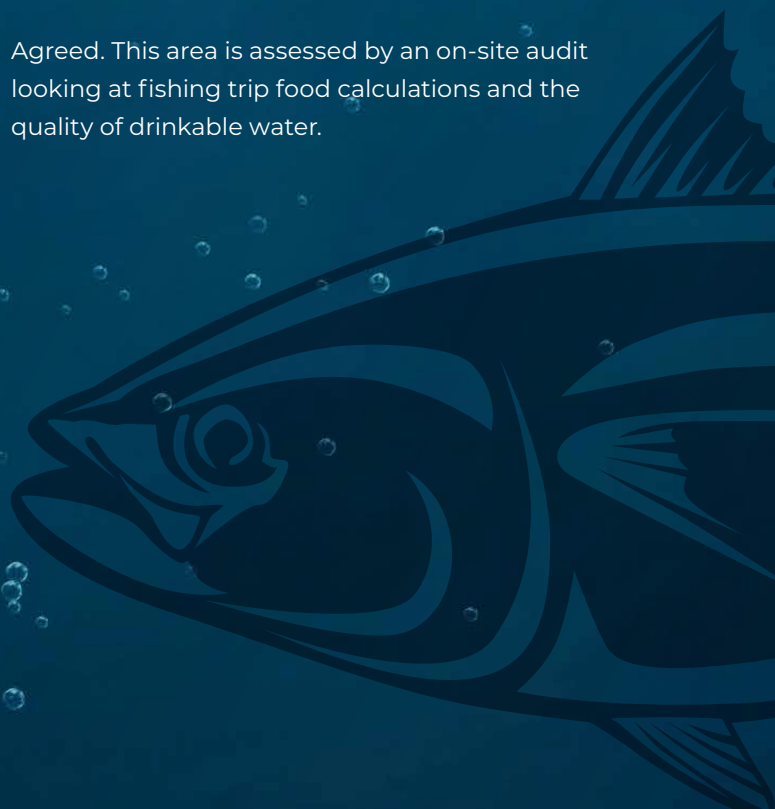
KDE # 31 Galley and other facilities – recreation, laundry, PPE storage

Every year, the FFA inspects tuna purse seine operations in the Pacific Ocean for a “good standing certificate” that ensures the fishing vessel meets FAO standards and specifications for marking and identifying fishing vessels and reports automatically and in a consistent manner to FFA VMS. This FFA good standing certificate is a very efficient tool for verifying that the vessel is legally operating in the WCPFC. In addition, the NFA through the fishing license has implemented a due diligence process to assess and audit the fishing vessel’s seaworthy and safety conditions prior to extending a fishing license.

These 2 documents are strong evidence of compliance with both FIA PNF RSP SR&CW and FISH standards for Crew requirements regarding occupational safety onboard.

KDE # 28 Food and potable water

Agreed. This area is assessed by an on-site audit looking at fishing trip food calculations and the quality of drinkable water.



4. RESULTS AND REFLECTIONS

Based on the developments and discussions throughout the project, the recommended KDEs and the supporting evidence, along with information on alignment and/or compliance, have been summarized in table # 1 (see page 11).

These KDE shall be captured by FIA PNG fishing vessels per trip under the MSC certificate and the fishing company shall provide verifiable evidence when it is requested for the FIA PNG claim of a fishing trip for compliance with regards to Social Accountability.

FIA PNG has developed an annual Social Responsibility & Crew Welfare audit plan for both remote/desktop and on-board audits to maintain the integrity of the certification and comply with the national, regional, and international onboard requirements regarding the crew. This is a way to demonstrate almost on a real-time basis the control of decent working and living conditions for the crew onboard the FIA PNG vessels.

Based on the initial discussion with the working group members, the later analysis including legal supportive verifiable evidence and the comparison with the FISH Standard for Crew and the FIA PNG SR&CW requirements it was concluded that only a few documents (that were already available) would be needed to support the inclusion of these KDEs in the iFIMS per fishing company initially and later per fishing vessel.



The documents needed to support these 23 KDEs on crew welfare per fishing trip are:

- 1. Crew list per fishing vessel**
(verify by trip randomly)
- 2. Crew contracts** (verify by FIA PNG remote audits)
- 3. NFA fishing license**
- 4. FFA good standing certificate**
- 5. FIA PNG RSP, SR&CW, and company employment policy**
- 6. Crew medical certificate** (verified by FIA PNG remote audits)
- 7. FIA PNG annual audit report**
(both remote and on-board)

The second stage was to share and recommend these KDEs and the corresponding documents to the Global Dialogue on Seafood Traceability (GDST) and the Global Fishing Watch (GFW) to consider them for social accountability onboard KDEs or references. Also to share this initiative with the Environmental Justice Foundation (EJF) are three important global references in the seafood and maritime sectors regarding human rights and crew welfare.

GDST took this project as a baseline for the GDST Global Dialogues in 2023 (South Africa, Singapore, Boston, and Barcelona). In April 2024 in Barcelona, the GDST funders and participants initially approved these KDEs as a baseline and further discussion led by the GDST Technical Council.

KDE reference	Document / verifiable evidence available	KDE name	ILO Convention 188 compliance
1	Crew list containing passport numbers	No child labor	Yes
		Crew list containing details based on FISH requirements	Crew list
2	Crew contract attached and audited per fishing vessel in annual basis	Protect migrant fishers	Yes
		Fair recruitment and placement of fishers	Yes
		Provisions for repatriation	Yes
		Fishers' work agreement	Yes
		Fair remuneration	Yes
3	RSP, SR&CW, and Company employment policy	Non-discrimination in employment	Yes
4	Crew contract attached and audited per fishing vessel in annual basis	Social security	Yes
		Health protection and medical care	Yes
		Fishers' compensation system	Yes
5	Fishing license and FFA certificate	Occupational safety and health – General	Yes
		Occupational safety and health - OSH review	Yes
6	FIA PNG audit report and annual planning	Safety orientation and training	Yes
		Crew medical certificate annual support	Fitness standards and medical exams
7	Fishing license and FFA certificate	Framework for oversight	Yes
		Accommodations are appropriate	Yes
		Spaces are well maintained	Yes
		Spaces are comfortable and safe	Yes
		Sanitary facilities are provided	Yes
		Galley and other facilities – galley and food storage	Yes
		Galley and other facilities - communication	Yes
Galley and other facilities – recreation, laundry, PPE storage	Yes		

4. RECOMMENDATIONS AND PROGRESS

- **FIA PNG has encouraged** its member fishing companies to provide the mentioned recognized verifiable evidence per fishing trip or on an annual basis when it is needed to the FIA office. There will be a note added to the MSC certificate stating that the fishing trip complies with FISH Standard for Crew and the FIA PNG RSP requirements.
- **iFIMS is the platform** to collect data in almost real-time.
- **The involvement** of fishing companies' representatives and iFIMS is crucial to achieve progress. It is an assurance model to allow for auto-control for the FIA PNG tuna fleet members.
- **It was recommended** to approve and add all the agreed KDEs (see table #1) and start to run a trial per fishing trip under the MSC certificate with iFIMS and onboard our FIA PNG fishing vessels.
- **The KDEs** represent a good way to demonstrate social and environmental sustainability in alignment with the FIA PNG iFIMS.
- **A trial in the form** of a pilot phase was recommended for three months after approval to investigate the compatibility of incorporating these KDEs in the iFIMS operational platform and for issuing MSC trip batch certificates.
- **It was agreed** to recommend to the GDST to consider these KDE for crew welfare on industrial fishing vessels as an extension of the GDST standard.
- **In 2024**, several stakeholders provided feedback to review the KDEs and extend the scope to other fisheries, for instance, to consider small-scale fisheries and other aspects of working and living conditions in a marine environment..

ABOUT THE FISHING INDUSTRY ASSOCIATION OF PAPUA NEW GUINEA (FIA PNG)

FIA PNG was funded in 1991 in Port Moresby, Papua New Guinea. FIA PNG aims to provide a united voice of the fishing and associated industries, to facilitate and encourage the promotion of Fishing and Associated Industries in Papua New Guinea and elsewhere and

to undertake, coordinate and promote liaison and negotiations with the National Fisheries Authority, the responsible Minister and any other representatives or bodies having an interest or an effect on the fishing or associated industries in Papua New Guinea.

Since 2018, FIA PNG's role and aims have evolved to include the Responsible Sourcing Policy that changed the FIA PNG's role from a country

association to become to a regional and global reference concerning the responsible management of both industrial and small-scale fisheries. The RSP and the FIA PNG strategic plan aim to improve PNG fisheries practices to promote sustainability, and social accountability across coastal communities and the industrial sector.

Since 2017, Seafoodmatter director Marcelo Hidalgo has been working in several capacities for FIA PNG. Currently, he is the FIA PNG Chief Operating Officer (COO) and fully responsible for the Responsible Sourcing Policy (RSP), which includes the 4 pillars of Sustainability, Social Accountability, Marine litter and fishing gear, and Traceability.

ABOUT SEAFOODMATTER

Seafoodmatter, founded in the Netherlands in 2014, is an independent international **advisory company**, specializing in integrated quality management (e.g. ISO 22000, HACCP, BRC, SA8000, BSCI, ILOC188, MSC CoC, ASC farms, etc), tracking & tracing and seafood supply chain management. Seafoodmatter, with more than 27 years of experience in seafood on a global scale, aims to support companies in the seafood supply chain, including the private sector, academia, philanthropy, governments and non-governmental organizations.

This knowledge comes from a solid academic background in aquaculture, fish quality, food science, sustainability and social accountability combined with experience in the seafood sector as a shrimp farm manager, seafood quality manager in the fish long liner industry, quality assurance inspector, product integrity manager, auditor, trainer for different standards and as a lead assessor for sustainable schemes. Having this background and the opportunity of working in more than 60 countries with suppliers of seafood products globally allows Seafoodmatter to understand the complexity of the seafood supply chain, and synergies across diverse fields, disciplines, and people.



Acknowledgement

The authors express their gratitude to the FIA PNG fishing company members, NFA representatives, and crew members who participated in and supported the creation of this publication.

Please cite this publication as follows:

Hidalgo, Marcelo; Posanau, Nialangis; Pokajam, Stephanie; Papaol Donald; Pokajam, Sylvester.
Key Data Elements on Traceability – Social Accountability & Crew Welfare on board.