

Statement of
Lisa Weddig, Director of Technical
and Regulatory Affairs
National Fisheries Institute
Presented to the Consultative Group to Eliminate the
Use of Child Labor and Forced Labor in
Imported Agricultural Products

March 29, 2010

Thank you for the opportunity to share information on a program utilized by many in the seafood community that helps to ensure that products aren't produced with illegal labor practices.

For more than 60 years, the National Fisheries Institute (NFI) has been the nation's leading advocacy organization representing all aspects of the seafood industry. Our members represent every element of the industry: ranging from harvesters, processors, and importers, to distributors, retail and food service operations. Members of NFI take allegations of mistreatment of workers at our over-seas suppliers very seriously and take steps necessary to ensure that seafood is sourced from operations that follow national labor laws.

I would like to put into perspective seafood consumption in the United States. The 2008 per capita consumption of seafood was 16.0 pounds per person – representing a small percentage of the total amount of animal protein products consumed by Americans each year. Over 80% of this seafood is imported and one-half of the top ten species consumed are sourced entirely or in part from aquaculture operations. Aquaculture provides a reliable year-round source for fresh seafood products that supplements the catch available through wild sources. Aquaculture also provides employment for tens of thousands of workers in areas of the world where few other opportunities exist.

As the popularity of aquaculture-raised species increases so does the need for responsible aquaculture practices. A leader in these efforts is the Global Aquaculture Alliance (GAA). Since 1997, this non-profit organization has advanced food safety, environmental and social responsibility throughout the raising, processing and distributing of aquaculture products.

To provide guidance on responsible aquaculture, GAA coordinates the development of Best Aquaculture Practices (B.A.P.) and certification to those standards for hatcheries, farms and processing facilities. These high standards best practices drive continued improvements that deliver significant benefits industry-wide. Current B.A.P. standards cover aquacultured shrimp, tilapia and channel catfish. Additional standards for *Pangasius* farms, salmon farms and feed mills are under development. Firms that are certified to the B.A.P. standards employ over 30,000 workers.

To promote broad stakeholder involvement, consensus and transparency in the standards development process, GAA delegates the primary oversight for the process to a Standards Oversight Committee (SOC) equally represented by industry, nongovernmental conservation and social justice organizations, and academic and regulatory interests. Species-specific Technical Committees, composed of technical experts and representative from stake-holder groups, draft the standards, which are then made available for public comment to allow for full transparency of the standards development, prior to final endorsement by the GAA Board of Directors.

B.A.P. standards are viewed as dynamic and open for continuous improvement with annual reviews and revisions by the Standards Oversight and Technical Committees.

Each B.A.P. standard comprehensively addresses components for the management of food safety, environmental protection and social accountability. The labor issues that are addressed in the social accountability standard are treated with equal weight as the other standards relating to food safety and environmental stewardship. Failure to meet critical labor requirements is cause for failure to achieve certification status.

The specific standards that address social accountability focus on the following worker relations:

- ensuring that workers are paid at least the minimum wage, including benefits, as required by local and National labor laws.
- abiding by the applicable National mandated work week
- complying with National labor laws for pay, overtime and holiday compensation
- complying with National child labor laws
- employing only legally documented workers

The Global Aquaculture Alliance has commissioned the Aquaculture Certification Council (ACC) to be the Program Managers for the B.A.P. certification program. Companies who wish to be certified against the B.A.P. Standards must apply to the ACC and perform a self-assessment against the standard in order to begin the process. ACC will review the application to determine the readiness for an external assessment. To qualify, applicants agree to hold subcontractors to the same B.A.P. standards, including inspection.

Certification to the standard requires the ability to demonstrate compliance to the B.A.P. standards through an independent assessment by an ACC-Approved Certification Body which is accredited to ISO 65 Standards by an international accreditation body. To qualify for ACC, the auditors used by the CB bodies have to have training in SA-8000 programs. Currently there are 15 accredited auditors working with the two ISO-65 accredited CB bodies (NSF and Global Trust).

During facility inspections, the auditor will evaluate whether conditions comply with labor laws by observation, interviews and document review.

For the consumer who wishes to make purchase decisions based upon the B.A.P. certification process, information and company participation is readily available via websites maintained by GAA and ACC. In addition, companies that participate in the program have the option of utilizing the "Best Aquaculture Practices Certified" mark on packaging for seafood to indicate adherence to the Best Aquaculture Practices standards. It is estimated at over 500 million pounds of imported seafood is produced from B.A.P. certified facilities.

As the Consultative Group deliberates to develop recommendations for a standard set of practices to reduce the likelihood that imported agricultural products are produced with illegal labor practices, we hope that you will consider one approach utilized by the seafood community through the GAA which incorporates social accountability standards within a more comprehensive best practices standard and certification program. Thank you.