**FEEDBACK FORM**

**DRAFT REVISED Seafood Stewardship Index methodology**

**Public consultation (deadline 31 January 2021)**

**Feedback process**

From 16 December 2020 to 31 January 2021, the World Benchmarking Alliance (WBA) is holding a public consultation on the [draft revised methodology](https://www.worldbenchmarkingalliance.org/research/draft-methodology-food-and-agriculture-benchmark) for the Seafood Stewardship Index. Interested stakeholders are invited to review the draft methodology and share their comments via this feedback form with us by emailing to [r.beukers@worldbenchmarkingalliance.org](mailto:r.beukers@worldbenchmarkingalliance.org)

This consultation is part of WBA’s continuous stakeholder engagement process. It builds on earlier presentations and meetings with a wide range of stakeholders, with input from WBA’s Allies, civil society, academics, business, business associations, investors and policymakers. With the publication of the draft methodology for the benchmark, we collect additional input from stakeholders. A set of numbered consultation questions for which we seek explicit feedback is outlined in the draft methodology and listed in this feedback form below. We also welcome feedback on any other aspect of the document.

Once we have received and incorporated feedback, WBA will publish a finalised methodology report for the Seafood Stewardship Index in early 2021, that we will then use to assess the 30 companies in scope of the index. A summary of the feedback received will be made publicly available. We thank all stakeholders for taking part in this public consultation.

**Contact details**

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| **Title** |  |
| **First name** |  |
| **Last Name** |  |
| **Organisation** |  |
| **E-mail** |  |

**Consultation questions**

**General**

**Introduction (p. 11)**

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| **M1 Do you have general feedback on the Seafood Stewardship Index?** |
| *Comments* |

**Alignment with other benchmarks, standards and reporting initiatives (p.13)**

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| **M2 Are there any key references we have missed that should be taken into account to inform the indicators?** |
| *Comments* |

**Analytical framework for the Seafood Stewardship Index**

**Weighted scoring approach (p.16)**

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| **M3 Which of the two options below best incorporates company contributions to a sustainable seafood industry, ensuring a fair and meaningful comparison?**  *Option 1*   |  |  |  |  | | --- | --- | --- | --- | | **Measurement area** | **Weight (%)** | **Indicators** | **Weight per indicator (%)** | | A Governance | 10 | 4 | 2.50 | | B Traceability and transparency | 15 | 4 | 3.75 | | C Ecosystems | 40 | 14 | 2.86 | | D Social responsibility | 15 | 9 | 1.67 | | Core social indicators | 20 | 18 | 1.11 |   *Option 2*   |  |  |  |  | | --- | --- | --- | --- | | **Measurement area** | **Weight (%)** | **Indicators** | **Weight per indicator (%)** | | A Governance | 10 | 4 | 2.50 | | B Traceability and transparency | 10 | 4 | 2.50 | | C Ecosystems | 40 | 14 | 2.86 | | D Social responsibility | 20 | 9 | 2.22 | | Core social indicators | 20 | 18 | 1.11 | |
| *Comments* |

**Management area B: Traceability & Transparency**

**Indicator 5. Monitoring the origin of seafood and marine feed ingredients (p.23)**

The company monitors the origins of marine ingredients in seafood production and in aquaculture feeds within its own operations and supply chains

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| **B1 Should compliance with SIMP and EU IUU regulations be considered enough to meet this indicator in all cases, given that weaknesses in those regulations have been identified? E.g.** [**Risk Assessment and Verification of Catch Certificates under the EU IUU Regulation**](http://www.iuuwatch.eu/wp-content/uploads/2016/07/Risk-Assessment-FINAL.DEC16.pdf) **(EJF, Oceana, Pew, WWF),** [**A comparative study of key data elements in import control schemes aimed at tackling illegal, unreported and unregulated fishing in the top three seafood markets: the European Union, the United States and Japan**](https://europe.oceana.org/en/publications/reports/comparative-study-key-data-elements-import-control-schemes-aimed-tackling) **(Oceana, Pew, TNC, EJF, WWF).** |
| *Comments* |
| **B2 Which elements of a traceability system should companies publicly disclose to demonstrate robust traceability? E.g., Key Data Elements, electronic traceability, interoperability.** |
| *Comments* |

**Indicator 6. Risk-based approach to IUU fishing (p.24)**

The company uses a risk-based approach to assessing IUU fishing–related issues across its operations and supply chains.

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| **B3 When companies are assessing IUU risks, should the focus be on legality or also look more specifically into unregulated and unreported aspects?** |
| *Comments* |
| **B4 Which elements of a IUU risk assessment should companies publicly disclose to demonstrate a robust approach?** |
| *Comments* |
| **B5 What is current best practice for IUU risk-based assessments?**  *Comments* |

**Indicator 7. Disclosure of the origins of seafood products and marine feed ingredients (p.25)**

The company discloses the source of its seafood products and marine feed ingredients.

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| **B6 What are the key data elements that can be expected to be disclosed publicly by a seafood company to demonstrate sustainable sourcing?** |
| *Comments* |
| **B7 What are other examples of best practice? Does the** [**Ocean Disclosure Project**](https://oceandisclosureproject.org/) **represent best practice in terms of key data elements that are expected to be disclosed publicly by a seafood company?** |
| *Comments* |

**Indicator 8. Disclosure of fishing activities (p.25)**

The company discloses its fishing activities.

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| **B8 What are the key data elements that can be expected to be disclosed about fishing activities?** |
| *Comments* |

**Measurement area C: Ecosystems**

**Indicator 9. Commitment to sustainable fisheries and aquaculture (p.26)**

The company has targets for sustainable fishing and aquaculture operations and/or sustainable sourcing of seafood and aquaculture feed ingredients, and publicly reports against these targets.

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| **C1 What are acceptable criteria that companies can use to define their sustainability targets beyond those suggested here (GSSI approved standards, FIPs, not overfished or subject to overfishing as defined by the FAO)?** |
| *Comments* |
| **C2 Should the indicator also differentiate between the ambition and quality of targets (e.g. targets covering 100% of the portfolio vs. targets covering 50% of the portfolio)?** |
| *Comments* |

**Indicator 10. Assessment of ecosystem impacts (p. 27)**

The company assesses the ecosystem impacts of its activities across its operations and supply chains.

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| **C3 What other kinds of ecosystem assessments beyond the ones suggested here (pre-assessment, full assessment against GSSI certification schemes, SFP Fish Source, Monterey Bay Aquarium ratings) can companies use to assess their ecosystem impacts?** |
| *Comments* |

**Indicator 11. Sustainable target fish stocks (p. 28)**

The company mitigates its impacts on target species stocks through activities that ensure and support science-based management.

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| **C4 What activities can companies implement to address target fish stock issues?** |
| *Comments* |

**Indicator 12. Bycatch (p. 28)**

The company mitigates its impacts on bycatch species.

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| **C5 What activities can companies implement to address bycatch issues?** |
| *Comments* |

**Indicator 13. Endangered species (p. 29)**

The company mitigates its impacts on endangered species.

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| **C6 What activities can companies implement to address endangered species issues?** |
| *Comments* |

**Indicator 14. Habitat (p. 29)**

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| **C7 What activities can companies implement to address habitat issues?** |
| *Comments* |

**Indicator 16. Antibiotics use and growth-promoting substances (p.30)**

The company reduces the routine use of antibiotics for aquaculture and specifically prohibits the use of prophylactic antibiotics and growth-promoting substances.

**Indicator 18. Medicine use (p.31)**

The company discloses quantitative information about the use of medicines to manage diseases and demonstrates how it reducesmedicine use within its operations.

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| **C8 Is the distinction between medicine use (for diseases) and antibiotics (for growth promotion) clearly addressed?** |
| *Comments* |

**Measurement area D: Social responsibility**

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| **D1 Does the list of social indicators (including Core Socials, Food and Agriculture social indicator and seafood specific indicators) cover all the main issues relevant and salient in the seafood industry?** |
| *Comments* |

**Indicator 23. Child Labour (p.35)**

The company eliminates and prevents child labour in its own operations and supply chain.

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| **D2** ‘Child labour’ in this indicator is defined as work by people aged under 18 (children) that is not permitted. This is different to ‘child work’, which is defined as work by people under 18 (children) that is permitted. Child work is carried out by ‘young workers’.  A child is anyone under the age of 18, as defined by the Convention on the Rights of the Child. ILO Convention C138 – Minimum Age for Admission to Employment (1973) specifies that a child aged under 18 can work if it is above the age for finishing compulsory schooling, and is not younger than 15 (or 14 in specific circumstances in developing countries) and as long as the work is not ‘hazardous’.  **This indicator assesses the prevention of child labour; safe working conditions for young workers (child work) are assessed in the health and safety indicator. Does this distinction make sense?** |
| *Comments* |

**Indicator 27. Farmer productivity and resilience (p.38)**

The company supports the resilience, productivity and access to markets of farmers and fishers, especially for small-scale producers.

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| **D3 How should companies – fishing and farming companies as well as consumer-facing companies – demonstrate their support for smallholder resilience, productivity and access to markets?** |
| *Comments* |

**Indicator 29. Respecting customary (indigenous) rights (p. 39)**

The company commits to respecting the rights of customary resource users, including the customary rights of indigenous communities.

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| **D4 Should this indicator be specifically about indigenous rights (which is well defined) rather than customary rights (which is harder to define)?** |
| *Comments* |

**Indicator 30. Supporting development of local communities (p. 39)**

The company demonstrates activities that support the development of local communities in the vicinity of its operations.

**Definition of local communities**

Local communities provide the social context for fishing, farming and seafood processing activities in the areas of a company's operations. In the SSI, this term is used to mean all people living in the area surrounding the company’s operations, including small- scale fishers and aquaculture producers, and all people relying on the area’s natural resources, including indigenous peoples and coastal communities.

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| **D5 How to best define local communities? Is the definition provided applicable to the context of the seafood industry?** |
| *Comments* |
| **D6 What are meaningful activities a company can do to support development of local communities?** |
| *Comments* |
| **D7 Should this indicator cover local communities both in the direct vicinity of operations and those affected by activities in its supply chains?** |
| *Comments* |

**Other indicators**

**Do you have comments/feedback about any other indicators not covered by one of the consultation questions?**

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| ***Enter indicator*** |
| *Comments* |
| ***Enter indicator*** |
| *Comments* |
| ***Enter indicator*** |
| *Comments* |

**Key concepts and definitions (p.46)**

**Do you have comments/feedback about any of the definitions provided in the glossary (p.46)**

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| ***Enter defined term*** |
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