



Seafood Processing Standard - Enhanced Social Module

Issue 1.0

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Global Seafood Alliance Certification Standard

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A Introduction


The intent of this module is to provide a more robust set of social accountability clauses under an audit framework which aligns with requirements of the Consumer Goods Forum's Sustainable Supply Chain Initiative (SSCI) benchmark for manufacturing/processing. This Enhanced Social Module has been developed to be used by seafood processing facilities where a more in-depth social auditing approach is required to meet their social accountability expectations.

The Enhanced Social Module will be audited concurrently with the Core Seafood Processing Standard 6.0, unless a facility selects to add this scope to an existing SPS certification. When the Enhanced Social Module is selected, the entirety of the SPS audit, including the Core standard and any other modules selected, shall be conducted on an unannounced basis. Auditors conducting the Enhanced Social Module shall be experienced social auditors who are at the APSCA Certified Social Compliance Auditor (CSCA) level. A CSCA auditor shall not be required for any other components of the audit outside the Enhanced Social Module.

The CSCA auditors will conduct detailed interviews with the facility's workforce to ascertain compliance. This additional layer of scrutiny will provide enhanced credibility and social assurance for facilities and stakeholders that require a more focused and rigorous assessment of a worker's employment and living conditions.

B Scope


This standard applies to enhanced social criteria for seafood processing facilities that are, or in the process of, becoming certified to Global Seafood Alliance SPS. Assessments to this module will be conducted by CSCA (BAP Category 8) auditors to be valid.

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C Clause Requirements

ESS1 General Requirements

- 1.1 The facility shall have a current version of this (ESS) standard available for employees and auditors.
- 1.2 The facility, or parent company, shall have a process to review and monitor national and local legislation to ensure that its policies and procedures are up to date and accurately comply with current regulations.
- 1.3 The facility shall have a written Human Rights Policy approved by senior management that covers all parts of the facilities' operation and clearly defines the department or management representative(s) who shall oversee its implementation.
- 1.4 The Human Rights Policy shall be communicated to all employees, contractors, relevant business partners, and other Inquiring stakeholders.
- 1.4.1 All communications to employees, contractors, and relevant business partners workers shall be conducted in a language or format they understand.
- 1.5 Employees in all relevant business functions shall be trained on the facility's Human Rights Policy. Training attendance shall be documented.
- 1.6 The facility shall have business ethics policy in place, approved by senior management, to demonstrate the facility's commitment to comply with all applicable national anti-bribery laws and prohibit any act of corruption, extortion, embezzlement, or any form of bribery – either directly or indirectly.
- 1.7 The facility shall not falsify any information regarding their activities, structure and performance including those that could be perceived as misrepresentation in the supply chain.
- 1.8 The facility shall inform all its suppliers and customers of their Ethical Trading Policy and requirements.
- 1.9 All workers shall be trained/informed in the Ethical Trade Policy and processes thereof and this shall be documented.
- 1.10 The facility shall exercise proper control to the extent of this standard over any contractor/facility that is used to outsource any processes that may have an impact on social responsibility.
- 1.11 Facilities shall have a written ESS Internal Audit Policy or procedure that shall be reviewed annually and overseen by a competent authority and/or department within the organization.
- 1.12 All identified internal ESS audit non compliances shall be closed out in advance of the external ESS audit and shall describe the corrective action and the time taken to implement.
- 1.13 Internal auditors shall be trained in conducting internal audits to this ESS and an auditor shall not be used to audit any section of this standard that they are directly responsible for.
- 1.14 All non-conformances and remedial actions that arise from the internal audit shall be communicated to the facility's senior management team to approve.
- 1.15 All records and other documentation shall be accurate and not show evidence or indication of falsification or adulteration.

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ESS2 Wages and Benefits


- 2.1 The facility shall ensure that all workers are paid at least the legal minimum wage, for a standard work week, excluding overtime payments, or the wage rate established by an employment contract or collective bargaining agreement, whichever is higher.
- 2.1.1 Workers do not feel obligated to work for no or low pay.
- 2.2 The facility shall have a plan and document steps taken to achieve the plan, that is reviewed at least annually, to pay workers a living wage that shall be based on local assessment of the wage requirements to cover the workers' basic expenses and allow for some discretionary funds for use by workers and their families.
- 2.3 The facility shall provide benefits that, at minimum, are required by local or national law or collective bargaining agreements. If not required by law the facility shall endeavor to provide at minimum benefits that provide decent working conditions for its workers, including, holiday entitlements, sickness benefits, medical or health insurance and paid maternity/paternity leave.
- 2.4 The facility shall compensate workers for overtime hours worked beyond the nationally mandated standard work week, at a premium rate, equal to the rate determined by an employment contract, collective bargaining agreement or local law, whichever is higher.
- 2.5 The facility shall not make deductions from wages that are not permitted by national law.
- 2.6 The facility shall not make deductions from wages as part of a disciplinary process.
- 2.7 Workers shall be informed about any deductions in writing and/or in a language/format that is understandable by the worker.
- 2.8 The facility shall only have access to a worker's bank account to make deposits.
- 2.9 Payment of wages shall not be made to someone other than the worker or into an account not controlled by the worker.
- 2.10 All workers shall be paid in full, in legal tender or directly into a bank account in his/her name, at least monthly or more frequently, as specified in the worker's employment contract. Delay in payment or irregular payments are not permitted. Forced savings shall not be permitted.
- 2.10.1 All wage payments shall be documented, and a pay slip shall be issued to the worker reflecting at least wages and deductions.
- 2.11 The facility shall not use contractors, subcontractors, temporary workers, homeworkers, apprentices, or other non-full-time employment schemes to avoid the payment of benefits, social security, etc. required by local or national law under a regular employment relationship.
- 2.12 The facility shall maintain all relevant documents, including complete and accurate work records and time sheets, that verify all workers, including piece rate workers and those who are hired through a third-party, are paid in compliance with local and national laws governing minimum wage, overtime and benefits.
- 2.13 Workers are not coerced or forced to fraudulently claim social security benefits or take out loans or credit agreements.

ESS3 Working Hours

- 3.1 The facility shall set working hours for a standard work week that shall not exceed 48 hours, excluding overtime, that comply with local or national laws, collective bargaining or contractual agreements, where applicable, or industry standards in the country, whichever affords greater welfare to the workers.
- 3.2 No worker shall work more than 12 hours overtime in any standard working week unless it has been granted under exceptional circumstances, it is permitted by national law, and it has been demonstrated that safeguards exist to protect worker health and safety.
- 3.2.1 If applicable national laws permit working hours greater than 60 hours per week, the maximum total hours worked shall be verified as meeting national requirements and the worker's name, position and number of hours worked in a given week shall be recorded.
- 3.3 All workers shall be provided rest and meal breaks during work shifts in compliance with local and national law at a minimum.
- 3.4 Workers shall have the right to a minimum of one full rest day (24 consecutive hours) after six (6) consecutive days worked, or two full rest days in a 14-day period.

ESS4 Forced, Bonded, Indentured, Trafficked and Prison Labor

- 4.1 All work including overtime shall be voluntary. Workers shall have the right to terminate their employment contract, including agreements concerning voluntary overtime agreements, without the threat of penalty or sanction and can leave their employment after they serve an agreed period of notice. Debt owed to the facility, or any other party shall not prevent workers from terminating their employment.
- 4.1.1 On or before the last day of employment, the facility shall pay the worker for all hours worked since the last paycheck. Pay, including earned holiday pay, is not contingent on working a minimum or set period of time.
- 4.2 The facility shall not engage in any form of human trafficking, including forced or indentured labor.
- 4.3 The facility shall not withhold any worker's personal identification documentation, including passports, work permits, and visas, or valuable possessions, including cell phones or other means of communication; hamper or prevent the renewal of travel or identification documents; or engage in any other means of coercion intended to force anyone to work.
- 4.4 If prison labor is used, it shall be voluntary and in alignment with the ILO Forced Labor Convention (No.29), 1930.
- 4.5 No worker shall be required to pay any deposits, bonds or collateral guarantees or recruitment fees or related costs directly or indirectly to secure employment with the facility.
- 4.6 All workers shall have the right to move freely in the facility, except in areas off limits for health and safety and food safety reasons, and to leave the premises when not working, including returning home during leave. Surveillance for the purpose of intimidation or control is not permitted. If the facility is in a remote location, transportation will not be withheld from workers to keep them from leaving the worksite.

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- 4.7 The facility shall prominently display information, in local languages or format understandable by the workers, regarding complaints and grievances, hot-lines, competent authorities, and other resources for victims of labor rights abuses.
- 4.8 If advances and loans to workers are provided, the facility shall have a written policy stating terms and conditions and this shall be communicated to workers in an understandable, transparent manner before they accept the loan or advance. These terms shall not be used to bind workers to employment and shall not include interest rates above market rate . Workers shall not be required to pay off debts before being able to leave employment.
- 4.9 Workers' communication shall not be restricted, including by being prevented from contacting their families or others outside the facility.
- 4.10 Contract switching shall not have occurred. The terms and conditions in the original contract have not been changed without the workers' knowledge and consent.
- 4.11 The facility shall have policies and procedures in place to reduce the risk of forced labor.
- [Required Datapoints:](#)
- 4.12 Do workers have untreated injuries or appear frightened, withdrawn, confused, dirty, malnourished?
- 4.13 Do workers look to or allow someone else to speak for them?
- 4.14 Were there any workers who were separated from the rest of the workforce?

ESS5 Child Labor and Young Workers

- 5.1 The facility shall not engage in or support the use of child labor. The facility shall comply with local child labor laws regarding minimum working age, or the age of compulsory education, or be in alignment with the ILO Minimum Age Convention 138, whichever is higher. The facility shall collect, verify, and retain age-related records of workers to confirm that the age requirements are met.
- 5.2 The employment of young workers (above the minimum age but under 18 years old) shall be in compliance with local or national laws, including required access to compulsory education and any restrictions on hours and time of day.
- 5.3 Young workers shall not be subjected to conditions which compromise their health or safety. This includes restricting working hours and prohibiting night work and hazardous work.
- 5.4 The facility shall have in place remediation policies and procedures for support to anyone identified as a child laborer in the facility. Depending on the age of the child, support must include at a minimum removal and reintegration into education.
- 5.5.1 If the remediation procedure is activated the facility shall keep, for at least three years, a record of all the actions taken and procedures put in place to avoid any recurrence.
- 5.5 Where contractors or labor recruiting agencies are used, the facility shall have policies and procedures in place to verify that such organizations meet the requirements of the ESS with respect to young workers.


[Required Datapoints:](#)

- 5.6 Does the facility employ young workers under 18 years of age?
- 5.6.1 Were there people who appeared to be under 18 years of age in the facility who were not working, excluding children in daycare?

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ESS6 Hiring and Terms of Employment

- 6.1 Workers shall have a legal authorization to work in the country they are employed in. Work performed and terms of employment shall be in compliance with local, national or international labor standards, whichever is stricter.
- 6.2 All workers, including temporary and those employed through recruitment agencies, shall enter into work under a signed agreement, available in a format/language they understand, specifying terms and condition of employment, including worker's rights, benefits, compensation, expected working hours, details of wages for each pay period each time they are paid, and facility policies regarding disciplinary actions, grievance procedures, any authorized deductions from pay, physical work, environment and housing, and similar.
- 6.3 Facilities shall have policies that encourage hiring of workers directly, and when recruitment agencies are used, they are compliant to this standard and are:
- Licensed and/or certified by the proper authority (if applicable)
 - Compliant with applicable national regulations
 - Operating in an ethical manner
- 6.4 Facilities shall have procedures to verify the above.
- 6.5 The facility shall have a policy reflecting the Employer Pays Principle that is publicly available and communicated to all workers, recruitment agencies, and other business partners.
- 6.5.1 If workers have paid recruitment fees or related costs, the facility shall document and reimburse the fees in a timely manner and shall develop a plan to prevent such fees from being charged in the future.
- 6.6 The facility shall maintain a list of all the recruitment agencies they use and have a documented process to monitor them on an annual basis to verify they continue operating legally and ethically. Records shall be stored, and corrective action plans should be kept and monitored.
- 6.7 Workers shall be informed in advance before any changes to their contract are mandated by the facility. Workers shall be given the opportunity to accept these changes or propose a compromise that both parties agree to. If no agreement can be reached the worker shall have the right to resign their position.
- 6.8 The facility shall not use consecutive short-term contracts and/or false apprenticeship or other schemes to avoid meeting its obligations to full-time rights, benefits etc. that are offered to its full-time employees.
- 6.9 Facilities that provide or allow training/apprenticeship programs shall provide evidence to verify such workers are not being exploited and their training or apprenticeship program meets applicable national legal requirements.
- 6.10 Workers shall not be required to sign blank papers.

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ESS7 Discrimination, Harassment, Abuse, Complaints, and Discipline

- 7.1 The facility shall have an equal opportunity policy in place that prohibits engaging in, or permitting, discrimination in any aspects of recruitment, employment, and compensation based on legally protected personal characteristics. Terms and conditions of employment shall be based upon the ability to do the job, not on personal characteristics or beliefs.
- 7.2 The facility shall have a workplace policy to cover violence and harassment in the workplace. It shall make clear that all workers are to be treated with dignity and respect, and that actual, or threats of, psychological, physical, verbal, or sexual abuse, bullying or harassment shall not be tolerated.
- 7.3 The facility shall not terminate employees for pregnancy, force the use of contraception, or reduce wages or discriminate in any way after maternity/paternity leave for returning workers. Jobseekers and workers shall not be subjected to pregnancy, virginity, HIV or Sexually Transmitted Infection (STI) testing.
- 7.4 The facility shall have in place a written procedure to address grievances, complaints, and concerns by all workers and external parties without fear of retaliation. The procedure shall include that retaliation against a party making a complaint shall not be tolerated.
- 7.5 The facility shall have in place an established complaints system to handle cases and allegations, including sexual abuse/harassment, bullying and/or discriminatory practices for jobseekers and workers, including management and staff. This shall, at a minimum, include a confidential reporting mechanism, information on any hotlines or other outside services available, and the possibility of initiating an independent assessment/arbitration
- 7.5.1 If the facility finds that they have caused or contributed to an adverse impact, either through the complaints system or by any other means, they shall provide or cooperate in providing effective remedy.
- 7.6 A record of actions taken to address grievances, complaints, and concerns shall be retained for up to three (3) years in a secure and confidential manner and shall state what the specified time frames were to close off each issue identified in the investigation.
- 7.7 Cases of human trafficking, and prison, indentured forced, bonded or child labor within a facility's operation or associated supply chain, whether perceived or proven, shall be reported to GSA and the facility's certification body immediately, or at least within 48 hours of such issue being identified by the facility.
- 7.8 The facility shall have a remediation procedure to be implemented when cases of human trafficking, and prison, indentured, forced, bonded or child labor are identified within its operation or associated supply chain, that shall create a remediation plan to support the rehabilitation of the affected worker and where necessary ensure that different actions are taken dependent on the age of the worker.
- 7.9 The facility shall have a written disciplinary procedure made available in languages or formats understandable by the workers.
- 7.9.1 Records of investigations with documented outcomes including disciplinary actions shall be retained in a confidential manner for three years or as required by national or local law.
- 7.9.2 The facility shall ensure that disciplinary actions do not include fines, or the threat or mention thereof, or other deductions not permissible by national legislation.
- 7.10 Workers shall not be forced to take drugs or alcohol.

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ESS8 Freedom of Association and Collective Bargaining


- 8.1 All workers shall have the right to associate, organize, and bargain collectively (or refrain from doing so) without the need of prior authorization from management. Facilities shall not retaliate against workers exercising their right to representation in accordance with international labor standards.
- 8.2 Where the right to freedom of association and collective bargaining is prohibited or restricted under local or national law, the facility shall strive to engage, not prevent, alternative means to facilitate worker representation and negotiation (for example, the election of one or more workers by other workers to represent them to management).
- 8.3 The facility shall grant worker representatives access to the workplace to carry out their representative functions.
- 8.4 The facility shall inform workers of their rights to freedom of association and collective bargaining and shall consult with their nominated trade union or worker representative on all issues that could impact the workers.

ESS9 Employee Facilities and Housing

- 9.1 If accommodation is provided or mandated, they shall be located in a separate building from operational and storage areas.
- 9.2 Provided or mandated housing shall meet local and/or national safety and health standards including but not limited to clean, watertight structures, adequate space as per occupational load for the facility, heating/ventilation/cooling, pest control, and a sufficient number of sink, shower, and toilet provisions.
- 9.2.1 The facility shall not require workers to pay deposits for accommodations that carry financial penalties for leaving employment or the accommodations early.
- 9.3 The facility shall provide safe, healthy, and clean conditions in all designated work, rest, dining, and housing areas as applicable. This includes, but is not limited to, provision of potable water, sanitary toilet facilities, and clean kitchen and food production storage areas.
- 9.3.1 Workers shall have access to free potable water close to their place of work.
- 9.4 The facility shall have a sufficient number of private, clean and safe, toilets and hand wash stations in compliance with local and national laws which are managed to accommodate the demand during breaks. These shall be readily accessible to employees and kept in good repair.
- 9.5 All workers shall be provided, free of charge, private changing facilities that are safe and hygienic, and a locker to securely store all their personal documentation and belongings that can be accessed at any time.
- 9.6 If meals are provided, they shall be safe, wholesome, or nutritious and commensurate with eating customs of the workforce.

Required Datapoints:


- 9.7a Are meals provided free to workers?
- 9.7b Are meals provided at a cost to workers?
- 9.7c Does the facility provide temporary or permanent accommodation (housing)?

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- 9.7d If yes, can the worker "opt out" of using this temporary or permanent accommodation provision?

ESS10 Worker Health and Safety

- 10.1 The facility shall appoint a member of management responsible for overseeing worker health, safety, and training.
- 10.2 The facility shall identify, prevent, eliminate, or minimize any workplace health and safety hazards through risk assessment analysis conducted by a competent individual at least annually or after an incident or accident or near miss.
- 10.3 Occurrence and investigation of health and safety incidents, investigations of accidents, and their cause and corrective actions taken shall be documented. This information shall be communicated to the facility management and at risk workers.
- 10.4 The facility shall have a fire and emergency protection and prevention plan in place covering all parts of the facility including housing, recreation, canteen, and storage areas where applicable. This shall include, but is not limited to, applicable local and national regulations relating to:
- Number of smoke detectors and/or fire alarms and their location
 - Number of functioning fire extinguishers/hydrants
 - Identification and sufficient number of emergency exits (including provision of appropriately designed emergency stairwells on multi-story buildings to support evacuation of personnel)
 - Identification of evacuation routes that are clearly marked, have proper lighting, and kept clear and unlocked while employees are present
 - Provision of training and enforcement for handling of flammable liquids and chemicals
 - Procedures to prevent fires during "hot" or intense heat working activities e.g., welding
 - What to do in the event of a natural disaster
 - What to do if a worker is seriously injured or taken ill
- 10.5 Facilities shall monitor that equipment and machinery are safe through, but not limited to:
- Properly functioning shields or guards
 - Warning signs/pictures
 - Emergency shut-off switches
 - Implementation of lock-out/tag-out procedures to prevent start-up during maintenance
- 10.6 Facilities shall monitor the strength, stability and safety of buildings and equipment in work, eating and, where applicable, housing areas. This includes but is not limited to structural welding/fastening, ensuring electrical safety through proper wiring, grounding of cables, and coverage of circuit boxes.
- 10.7 An Emergency Response Plan shall be prepared for serious illnesses, accidents, natural disasters, or other incidents. As part of this plan the facility shall inform all workers that if they feel that they are in imminent danger to their personal safety they shall have the right to relocate to a safe area without first seeking permission from the facility's management team.
- 10.8 The Emergency Response Plan shall be reviewed, and emergency procedures tested, at least annually or after any major modification to the facility to ensure it effectively addresses worker health and safety.

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- 10.9 Select workers shall be trained in the details of the Emergency Response Plan and in first aid of electrical shock, profuse bleeding, drowning and other possible medical emergencies. A list of the trained workers shall be available. At least one of the trained workers shall be present at the facility while it is in operation or maintenance.
- 10.10 Emergency evacuation drills (in case of fire, chemical leak or similar) shall be conducted, at a minimum, annually, to include all shifts and floors, and conducted jointly with other occupants in the building. Drills shall be conducted similarly in housing facilities. The frequency of fire and evacuation drills shall be documented and verified.
- 10.11 The facility shall limit worker exposure to sounds more than 85dB in volume to less than eight hours a day or less if mandated by a stricter national standard. If workers are exposed to sounds more than 85dB in volume for greater than eight hours in a day, the facility shall provide hearing protection devices to reduce below 85dB.
- [Required Datapoint:](#)
- 10.12 How many health and safety accidents and incidents were reported over the past 12 months at the facility?

ESS11 Personal Protective Equipment (PPE) and Clothing

- 11.1 The facility shall maintain a list of PPE and a controlled issuance procedure that monitors the proper use of protective equipment and clothing provided to employees, contractors, and visitors.
- 11.2 PPE and hygienic clothing shall be provided free of charge and be properly maintained and replaced as necessary.


ESS12 Medical Care

- 12.1 The facility shall provide access to medical care facilities for all workers, including access to or communication with medical and other emergency authorities in case of emergencies or accidents.
- 12.2 Facilities shall maintain records of medical care provided to individuals at the facility. Records shall remain confidential and be retained for a minimum period of three (3) years.
- 12.3 First aid kits shall be clearly marked and be readily available to employees close to work and rest areas and sealed to prevent contamination.
- 12.3.1 The facility shall maintain a list of first aid items kept on hand and, where appropriate, their expiration date and any expired content shall be replaced.
- 12.4 Facilities shall have in place remediation procedures for individuals injured as a direct result of a workplace accident and who are now not medically capable of conducting their contracted work function.
- 12.5 The facility shall provide medical screening reviews on a regular basis based on a risk assessment to workers who are handling hazardous materials or chemicals, and hearing tests for workers exposed to loud noises.

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ESS13 Employee Training

- 13.1 The facility shall have documented training for workers, based on their specific roles within the company, in areas that include but are not limited to those identified below. All training shall be overseen by a trained competent authority(ies).
- Machine operator and other dangerous equipment
 - Dangerous chemicals, toxic substances and use and disposal of dangerous materials and clean-up of spills
 - New employee orientation training in general health, safety, product quality and the prevention of product contamination shall be conducted prior to employees performing any work or on-the-job training.
 - Fire and electrical emergency prevention and safety
 - Personal hygiene
 - Food safety and Good Manufacturing Processes
 - Refresher training programs
 - Any other area that deemed potentially hazardous or a threat to employee safety
 - Workers have been given training on the facility's grievance mechanism and how to use the complaints process
- 13.1.1 Training programs shall include specific requirements that monitor, verify, and document the effectiveness of the training, and that training programs are being effectively transferred to the workplace.
- 13.1.2 Records that verify proper training for all elements described above shall be maintained and retained for three (3) years.
- 13.1.3 Senior management shall ensure that all training programs are properly facilitated by suitably qualified trainers/coaches.
- 13.1.4 Where local law requires workers to be licensed to operate or maintain such items, proof of current licensing shall be maintained.
- 13.2 All training shall be conducted within normal working hours for a worker and at no financial cost to the worker. Where training must be conducted outside of normal working hours the worker shall be compensated for their time and paid at a premium rate of pay, for any overtime hours, as stated in clause 2.4.

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