
April 22, 2017

EAC input to ASC-MSC Seaweed Standard second round of consultation

(For EAC record – Official input submitted through the MSC online survey)

Survey Question 2 & 3

See notes below on including more language that is relevant for producer owned cooperatives or associations that may be able to achieve certification

Survey Question 9

The farm management or jurisdiction with governance control should definitely include clear references that cover the key points of Principle 4 and 5. See notes below on FAO small scale fishery guidelines as an example of how countries can include the rights of small scale fishers (which in many countries are the majority of seaweed farmers and harvesters).

The Principle 4 and 5 types objectives can be (and often are) included in local governance, national fisheries laws that protect rights of small holders, or can be enshrined by producer owned associations etc.

Survey Question 11

In some areas, if a local governing unit, farmer's cooperative, or buyer will be the client for the certification, you could be dealing with hundreds of small scale seaweed farmers being part of the 'management area and system'. They could also be spread out over a large area or multiple small islands. This is common in some key seaweed growing countries. In these cases, 20 farmers would not give you sufficient numbers to indicate the reality on the ground and assess Principle 4.

Instead, the auditor could hold Focus Group Discussions or consultations in the key areas that cover a good representative area. FGDs with 15-20 participants combined with individual interviews would be relatively easy to undertake and not much more cost if the auditor is already in the area. This would allow for a larger breadth of consultation.

The guidance only speaks of 'workforce'. The guidance should use a different term to also include many individual farmers that have come together for certification under an organization or co-op, for ex - rather than under a company as employees.

Survey Question 12

Again, the language used throughout needs to be reviewed to reflect the reality of the majority of the seaweed farming production in developing countries. This is overwhelmingly done by family owned farmers who may come together as organizations or cooperatives. Even if a buyer or process is the one to hold the certification - they are not usually buying from 'employees', but rather from hundreds of independent farmers.

It is easy to identify the owners and ownership structure through social audit and interviews.

Farmers know the area of their farm, they have clear identifying marks that indicate ownership to themselves and others in the community.

Family farming businesses will likely only ever access certification through an association set up or through buyers. In both cases, they should not be exempt from listing the farmers included in the certificate, their area, species, etc.

For the specific PI on child labour and family farms - the guidance can use language that ensures children working on their family seaweed farm are doing so in a manner that is not stopping them from attending school and is voluntary. The farmer association who holds the certificate can keep school records to show children continue to attend school until a certain age (depending on the country law)

Again, all of the guidance that is currently written more with 'employees' as terms can be slightly revised to work for farming co-operatives or associations of individual farmers.

Any association would need to be registered and recognized by local authority or traditional authority and should have an association by laws or customs that are clear to all members. In many countries there are already regulations and laws in place that farming associations and co-operatives need to follow to register - and having best management practices in their association by laws would be very important to ensure seaweed farming is managed sustainably.

Though small scale farming is typically sustainable, there are practices that family farms employ that at scale can lead to damage - having the best practices of farm management required by members of the farming co-op or association wanting to hold the certificate is the best way to move whole areas towards low impact farming practices.

Survey Question 14

Migrant workers and issues with discrimination etc can also occur in small holder contexts not only company farmers with workers.

There are migrants who move to areas to farm seaweed and are often not allowed to join the local cooperatives or associations despite residence for a long time. They are often discriminated against in buying practices and are not offered services by local government units. If the certificate is belonging to a farm association or buyer the area that they buy from or association should have to show that all farmers in the area are given opportunities to sell their seaweed or join farmer groups.

The local governance should also be screened to ensure they are not discriminating against migrants from other areas.

Again, most of the health and welfare aspects of P4 can also have wording that ensures family farmers are also in a minimal ways within their bylaws and customary agreements maintaining basic rights, health, etc of their member farmers in terms of farm management requirements and their meeting and decision making practices.

Survey Questions 15

There should be mention of family farm, cooperative farm organizations in all guidance

Again, in reality individual family small farms will never hold a certification. The only way they will manage to be part of a certificate is through a large enough farmer owned association - which is most countries requires minimum standards in terms of registration, basic documents, etc. And best practice is that producer co-operatives have member rules, the ability to treat everyone fairly, management practices to be abided by for quality, good meeting and decision making practices, etc etc

Even in customary settings, these are/should be well understood by members even when not officially written

If it is a buyer or processor that will hold a certificate and source from many family farmers ensuring that there is documentation from them and clear agreements understood by their farm suppliers is key to ensuring the farmers themselves will benefit from the certificate. Buyer should be following responsible practices when sourcing from farmers - with clear pricing, equity, etc and this should be in their documentation whether that is employees or individuals that they will trace their seaweed source too. This will go a long way to improving equity in the seaweed farming value chain and achieving the principles set out in the Standard.

Just because family farmers are not recognized as employees - the certificate holder can have in place equivalency that ensure they are not exploiting poor rural families.

This is true for Principle 4

For Principle 5 - this is where many of the guidelines and bylaws for farmer owned coops or associations can easily mirror the language used in the guidance that refers to a single owner farm. For ex, there is scoring and guidance related to impact assessment, consultation with community, stakeholders, etc.

A farmer co-op or association or community of many farms should also ensure that they are consulting their members appropriately and inclusively. And that they are aware of the impact of their seaweed farming on other uses and livelihoods in the area. Farmer run co-ops should

not be exempt from 5.1 or 5.3 and this can be determined by auditor consultations and interviews

Co-operative and associations in developing countries often represent hundreds of farmers and are capable of keeping records

I suggest you refer to the FAO Voluntary Guidelines for Securing Sustainable Small Scale Fisheries. Many countries have now signed and ratified these guidelines and they are important for the seaweed standard as many seaweed operations are conducted by small scale fishers and their rights are covered by these guidelines.

The national at least and other jurisdictions that the UoA fall under should be compliant with the guidelines in principle. These guidelines can guide the standard further of the language and the governance mechanisms that should be in place to safe guard the sustainability of the environment where seaweed harvesting and farming takes place and the producers.

You will also find more appropriate references for working in FAO documents related to family fishing as well as documents on co-operatives, fishing associations etc that can be used for including language that goes beyond employees in your guidance and write ups.