

MEANINGFUL STAKEHOLDER ENGAGEMENT IN SEAFOOD ECO-CERTIFICATIONS

What we heard at SeaChoice's stakeholder
workshop at the 2019 SeaWeb Seafood Summit
in Bangkok, Thailand.



INTRODUCTION

Many seafood eco-certifications gain credibility due to the engagement opportunities they provide for stakeholders. Stakeholder consultation is a fundamental element for many of the eco-certification schemes' frameworks, a number of which adhere to the United Nations Food and Agriculture Organisation (UN FAO) guidelines for ecolabelling and the International Social and Environmental Accreditation and Labelling (ISEAL) credibility principles and codes of practice. Some have achieved recognition by initiatives such as Global Sustainable Seafood Initiative (GSSI), in part due to their stakeholder-engagement processes.

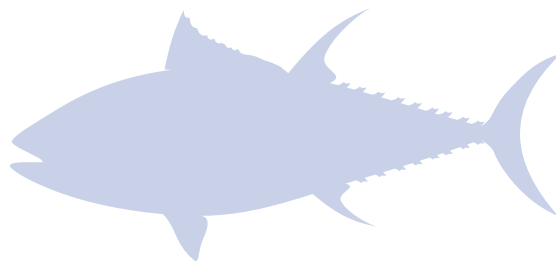
However, some stakeholders are reporting fatigue, frustration and disillusionment with seafood certification schemes. Common reasons given are the number of certifications they must engage with, the complexity of the schemes, the challenges with accessibility for local knowledge holders and the lack of transparency in decision-making. Some civil society groups have even initiated public campaigns in response, at least in part, to certain certification schemes' inability to effectively address stakeholder concerns.

In the context of this growing discontent, this report explores stakeholder sentiment in participating (or not) in seafood eco-certifications and their various processes, what challenges and barriers stakeholders have experienced, and what improvements eco-certifications could make to help ensure meaningful stakeholder engagement.

This report is informed by discussions at a workshop that SeaChoice¹ hosted with eco-certification stakeholders in May 2019 during the SeaWeb Seafood Summit in Bangkok, Thailand. The workshop was timed to coincide with this event because many stakeholders would already be gathered in one place and because both wild and farmed seafood eco-certifications are looking to expand in the Asia-Pacific market, making local expertise and stakeholder accessibility critical for this region.

Workshop participants included staff and/or volunteers from environmental and social non-profits who may or may not have had direct experience with engaging in eco-certification processes as a stakeholder but have directly engaged with the schemes in some manner. Some attendees regularly consult (or previously had) on certification audits and/or scheme projects, others had experience on eco-certification scheme advisory boards, and others support the eco-certifications through their NGO-to-business partnerships. Attendees included international and Asia-Pacific regional representatives. SeaChoice also conducted interviews with interested stakeholders who were unable to attend the workshop.

This report does not aim to provide a comprehensive list of stakeholder views expressed during the workshop, but rather to capture various perspectives and contribute to the discussion on what best practice stakeholder engagement means in the context of seafood eco-certifications. SeaChoice offers these “what we heard” insights, as well as stakeholders' articulated recommendations for all seafood eco-certifications, with the intent to foster improvements that can lead to more meaningful stakeholder engagement processes.



¹ As workshop hosts, SeaChoice and its partner organizations have collectively engaged as stakeholders in well over 100 certification assessments and audits of fishing and aquaculture operations over the last decade. We are now focused on improving eco-certification to ensure credible processes and robust standards.

DEFINING MEANINGFUL STAKEHOLDER ENGAGEMENT

“Stakeholder engagement is crucially different to stakeholder management: stakeholder engagement implies a willingness to listen; to discuss issues of interest to stakeholders of the organization; and, critically, the organization has to be prepared to consider changing what it aims to achieve and how it operates, as a result of stakeholder engagement.”

- Neil Jeffery, 2009, *A Road Map to Meaningful Engagement*

Evidence suggests stakeholder participation can lead to higher quality decision-making and outputs (Renzo et al. 2016, Reed 2008). However, this is strongly reliant on the quality of the process that leads to decision-making and other outputs. Done badly, such processes can cause stakeholders to become cynical, to harbour distrust and to withdraw from the decision-making process. Such cynicism can, in turn, threaten the legitimacy of the decision-maker (O’Faircheallaigh 2010, Gulbrandsen 2005).

There is widespread agreement that stakeholder participation hinges on the need for a genuine opportunity to be heard and to influence the decision (Steward et al. 2007, IAP2 2019, Jeffery 2009). Therefore, for engagement to be genuine, decision-makers should be open to stakeholder influence and ensure outcomes are not predetermined. Furthermore, local and cultural contexts should be incorporated and embraced throughout engagement processes (Wilson et al. 2016). Box 1 describes the core values for effective and meaningful stakeholder participation in decision-making processes.

BOX 1 - CORE VALUES FOR EFFECTIVE AND MEANINGFUL STAKEHOLDER PARTICIPATION

Stakeholder participation:

- is based on the belief that those who are affected by a decision (i.e., stakeholders) have a right to be involved in the decision-making process.
- includes the promise that the stakeholder’s contribution will influence the decision.
- promotes sustainable decisions by recognizing and communicating the needs and interests of all participants, including decision-makers.
- seeks out and facilitates the involvement of those potentially affected by or interested in a decision.
- seeks input from participants in designing how they can participate.
- provides participants with the information they need to participate in a meaningful way.
- communicates to participants how their input affected the decision.

*Source: Adapted from IAP2
and Jeffery (2009)*

WHAT WE HEARD

The SeaChoice workshop consisted of approximately 25 attendees from organizations with experience engaging with fishery and aquaculture certifications in some manner. Attendee geographical representation included Asia Pacific, Europe, North and Latin America. Presentations on organizational stakeholder experiences with eco-certifications provided a contextual introduction to the workshop. Facilitators lead conversations on questions with three breakout groups. Targeted surveys with the same questions were also distributed to 10 stakeholders who were unable to attend the workshop. Facilitators for the workshop were Shannon Arnold from the Ecology Action Centre, Kelly Roebuck from the Living Oceans Society and fisheries consultant Dr. Cat Dorey. We thank: all workshop participants for their time and invaluable insights; Liane Veitch and Sian Morgan for taking notes; and all survey respondents.

PARTICIPANTS WERE ASKED THE FOLLOWING QUESTIONS:

- ❓ **Do you currently engage with fishery or aquaculture eco-certifications?**
- ❓ **Why do you or don't you engage?**
- ❓ **If you previously engaged but have stopped, why did you stop engaging?**
- ❓ **How can we get more stakeholders engaging in seafood eco-certifications?**
- ❓ **How can global standards ensure local expertise is included in assessments and audits?**
- ❓ **What would make you satisfied that your input has been appropriately considered?**

Participants' answers and accompanying discussion informed this report-back of "what we heard" and, in turn, the subsequent stakeholder recommendations for standard holders.

TO ENGAGE OR NOT TO ENGAGE

Workshop attendees' engagement experience with seafood eco-certifications varied. Those who currently engage do so as a way of expressing stakeholder concerns regarding the industry's environmental and/or social impacts. Some participate as a way of leveraging or hindering market access, others as a way to influence government agencies to improve industry regulation and oversight.

Some participants who have never engaged cited organizational priorities or philosophies that favour other tactics to achieve sustainability, such as government policy reform. Others reported that they might have engaged but the stakeholder engagement process was not user-friendly, appeared too difficult and required the need to "speak their language." In fact, one participant commented that it appeared as if eco-certifications make it so difficult to provide input that it seems as if they don't want any input at all. Participants who don't currently engage also noted their lack of capacity (time and resources) to do so.

A number of stakeholders who actively engaged previously reported decreasing their engagement or completely disengaging as they saw little benefit in continuing. Many commented that in their experiences, outcomes seemed predetermined, felt like a "done deal," or that the process was simply a "box-ticking exercise" with nothing changing as a result of engagement. Common reasons participants cited for disengaging were the lack of impact or influence their input appeared to have, frustrations regarding the response (or lack thereof) from auditors and/or the standard holder, and opaque decision-making.

One participant felt that continuing to provide input when it doesn't have an impact gives eco-certifications an undeserved legitimacy. However, another participant noted that withdrawal of stakeholders from engagement processes can be misinterpreted as a "lack of concern" regarding a certification and/or fishery/farm.

ENGAGEMENT PROCESS CHALLENGES

Some workshop participants complained that there was often a lack of notification (i.e. not appropriately included on the stakeholder list) or, if notice was given, it was often not enough for them to participate. Often the onus of procuring information on processes or updates is on the stakeholder to actively “watch” the eco-certification’s website.

Auditors often miss (whether on purpose or not is unclear) appropriate stakeholders – particularly smaller and/or lesser-known local civil society groups. Participants noted that auditors are usually based somewhere far away and lack local expertise and knowledge. Groups interested in social sustainability have found that many auditors are not adequately trained in social components.

Participants shared their frustrations with what would seem like simple actions (or inaction) in terms of engagement, such as scheme holders and auditors not responding to stakeholder emails. Some wondered whether the schemes would rather not hear from those who seek improvements or submit critiques and concerns.

Other challenges participants raised were difficulty in obtaining the information required to participate, the absence of clear guidance on how to participate and that consultations used too many technical or specialized terms (i.e., jargon) and therefore required stakeholders to “speak their language” if they wished to be heard. Sometimes this was required quite literally; local stakeholders reported that documents were often not available in their language. There is no standard for translations and the English version is the ultimate legal version. And even for native English speakers, the language is often dense and complex. Overall, the process could be summed up as seldom being user-friendly.

Stakeholders who have disengaged or have significantly reduced engagement commonly cited frustrations with the lack of accountability and transparency on how decisions are made. That is, stakeholder comments often appear to go into a “black box” of decision-making, and when the outcome is announced there is no rationale or explanation as to how input was considered, or not. Where responses have been provided, stakeholders typically felt that they were not meaningful as they rarely adequately addressed stakeholder concerns. Even detailed responses may not explain why input was not reflected in the final decision or outcome.

Many stakeholders felt that schemes prioritized building relationships and trust with industry over civil society groups. Participants also felt that eco-certification outreach was largely focused on international markets and not at the local or community level.

Some participants suggested that eco-certifications’ reliance on logo licensing for their operations is a conflict of interest that could prioritize clients’ interests over stakeholders’ concerns. Stakeholders shared similar concerns regarding auditing bodies. As auditors receive direct payment from clients for certification of their fishery or farm, participants raised questions about whether the objectivity of audits are rigorously upheld and stakeholder concerns adequately considered.

Stakeholders expressed a general sentiment that stakeholder disillusionment is not taken seriously enough. In many cases, negative stakeholder feedback was perceived to be met with reactionary hostility by eco-certification schemes. This further eroded stakeholder trust in engagement processes.

BEYOND ENGAGEMENT PROCESSES

Finally, stakeholders felt that their eco-certification engagement concerns were not adequately given discussion space within the broader “sustainable seafood community.” For example, events such as the SeaWeb Seafood Summit and Seafood Expo North America (a.k.a. the Boston Seafood Show) often include panels on eco-certification but these rarely provide an opportunity to discuss the schemes’ strengths or weaknesses with respect to addressing stakeholder concerns.

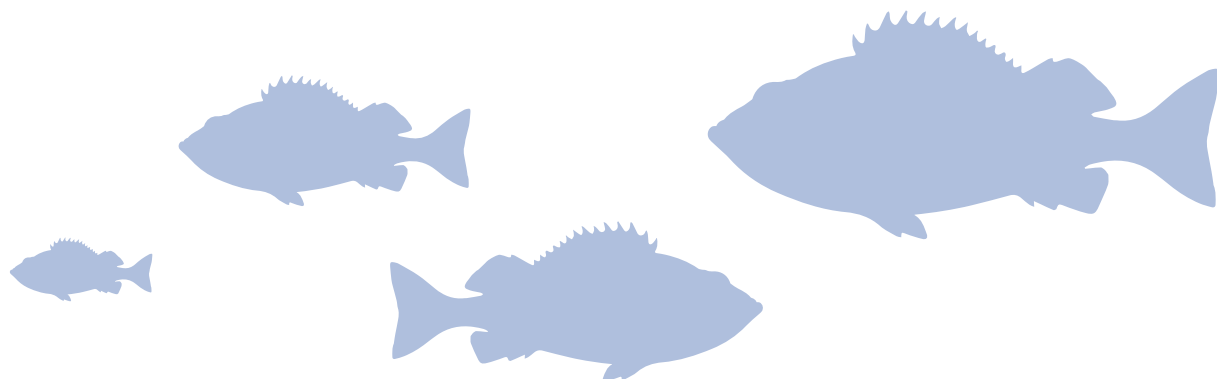
Initiatives to simplify the proliferation of schemes, such as eco-certification benchmarking (i.e., paper criteria comparisons), have made it easier for market actors to choose “credible” eco-labels but have arguably resulted in stakeholder concerns regarding “in-practice” deficiencies of the schemes being largely ignored.

RECOMMENDATIONS

The following captures a number of recommendations articulated by workshop participants and survey respondents. In terms of improving processes, stakeholders raised three main themes: make the process easier, make it count and make it local. These recommendations are not specific to any single seafood eco-certification scheme, but rather are offered as practical actions that can be taken by any scheme that desires effective and meaningful stakeholder engagement processes.

MAKE THE PROCESS EASIER

- ✓ Notify stakeholders early in the process.
- ✓ Invest in notification systems so that stakeholders don't have to constantly check websites for processes that may affect them.
- ✓ Provide easy access to process information and consultation documents.
- ✓ Provide clear guidance and lines of sight (backwards and forwards) in consultation documents. Include any information from previous consultations on the topic, the evidence and science that informed the consultation documents, future consultation timelines, etc.
- ✓ Present process information and consulting documents in a user-friendly manner that is simple, clear and avoids complex or technical terms and other jargon where possible. Include a glossary in the consultation documents.
- ✓ Use multiple tools to present the consultation in a way that provides personal contact with stakeholders (e.g., workshops, group meetings, bi-laterals, phone conversations).
- ✓ Ensure the manner in which comments can be submitted is simple and does not require that stakeholders use the technical language of the eco-certification.
- ✓ Provide reasonable time frames for stakeholder comments; best practice suggests 12 weeks.
- ✓ Proactively educate stakeholders on standards and processes. Provide updates on these as required.



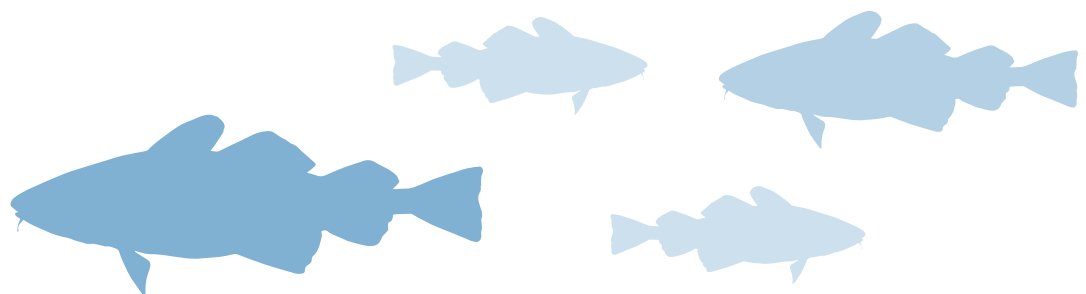
MAKE THE PROCESS COUNT

- ✓ Conduct thorough stakeholder mapping prior to consultation and audits.
- ✓ Ensure the process is inclusive, not selective or exclusive, and includes a diverse representation of perspectives.
- ✓ Speak to affected stakeholders prior to consultation to proactively discuss any issues or concerns.
- ✓ Design the consultation process with affected stakeholders.
- ✓ Ensure a two-way dialogue at all times, with engagement during all stages of the process.
- ✓ Ensure the consultation process is transparent, with full access to all information (data, science, work done to date and by whom, etc.) during the process.
- ✓ Build good relationships and communication channels with stakeholders before, during, after and between consultations.
- ✓ Ensure stakeholder input is equally weighed. Avoid giving industry and/or the client more weight over civil society groups.
- ✓ Develop a clear reporting-back mechanism that provides information on how decision-making was informed and how input was considered, or not. Communicate honestly and respond directly to input and concerns.
- ✓ Remove any perceived conflict of interests; separate standard-setting from logo and licensing and separate certification costs from auditing.

MAKE THE PROCESS LOCAL

(“local” meaning where the consultation is taking place)

- ✓ Appoint local staff and auditors who have local expertise and knowledge, and who can spend time with the community.
- ✓ Train local staff and auditors on standards and processes in regions where needed.
- ✓ Educate local stakeholders on the value of certification and how to engage.
- ✓ Ensure stakeholder mapping is conducted at a local community scale and includes groups that may not have high public visibility.
- ✓ Provide the resources (e.g., staff, workshop facilitation, funding, etc.) necessary for local groups to participate.
- ✓ Tailor the process, including consulting documents, to the local context and language.



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