ACCOUNTABILITY IN SEAFOOD SUSTAINABILITY.

SUMMARY OF FINDINGS AND RECOMMENDATIONS FOR THE GLOBAL GOOD AGRICULTURE PRACTICE (GLOBALG.A.P.)

EUREPGAP was initiated by the Euro-Retailer Produce Working Group (EUREP) in 1997 to harmonize the various food standards and procedures used by European supermarket chains by developing a single Good Agriculture Practice (G.A.P.) standard and certification system. The standard’s aquaculture module was introduced in 2004 and the certification was renamed GLOBALG.A.P. in 2007. The Integrated Farm Assurance (IFA) standard for aquaculture entails meeting guidelines for food safety, environment, workers and animal welfare for the entire production chain. The Compound Feed Manufacturing Standard defines best practices guidelines for compound feed manufacturers (including those supplying to GLOBALG.A.P.-certified aquaculture facilities). The consumer-facing label, named GGN, was introduced in 2016 for GLOBALG.A.P.-certified aquaculture products.

FINDINGS

1 Development

The Aquaculture Technical Committee is responsible for improvements and maintenance of the standards, as well as participation within the development process for new or revised standards. The committee consists of six retail or food-service members and six producer or supplier members. No civil society stakeholders are represented on the committee. Instead, civil society stakeholders may be invited to focus groups, technical meetings or targeted consultations. Public consultation occurs for standard creation, revisions and auditing guidelines (known as the General Regulations). Public comments from previous consultations could not be found; however, comments and explanations have been provided for the aquaculture standard revision under the Integrated Farm Assurance Standard v6 second consultation (currently in progress). Tracked changes between standard versions are also available.

GLOBALG.A.P. states that it does not implement amendments, variances or interpretations that alter standard or program rule criteria. There are National Interpretations Guidelines (NIG) where necessary. A NIG is a document for certification bodies that provides country-level guidance on how to implement and audit against the standard at a national level. It does not change the standard’s control points or compliance criteria.
2 Governance

The GLOBALG.A.P. board consists of seven retailer or food-service and seven producer or supplier representatives. Of the supplier seats, one seat is for each scope (i.e., one supplier seat for aquaculture). No civil society stakeholders are represented. Current board members, eligibility criteria, annual reports and decision-making protocols are made public. However, meeting notes and performance reviews are not.

3 Verification

Information on the audit process, a list of certified farms, certificate and contact information for the certifying body are publicly available. No public consultation is conducted during the auditing process, nor are audit reports or summaries published. GLOBALG.A.P. states that this is for reasons of confidentiality. If requested, access to audit reports can be shared on the explicit permission of all participants involved.

4 Monitoring

There is currently no defined theory of change or M&E program that assesses the impacts of the standard against intended outcomes.

An outline of the auditor accreditation process, as well as certifying body performance ratings and breaches, are published on the website. Public rules for label use are available. Label breaches are not published; however, GLOBALG.A.P.’s Brand Integrity Program publicly reports on the number of misuses per year.

5 Dispute settlement

Complaint procedures regarding certificate and standard-holder disputes are available, along with a contact. The certification complaint procedure lacks an independent third-party mechanism as the certification body investigates the complaint. Traceability checks may involve an independent expert. In the case of standard-holder disputes, the complaint is investigated internally between the GLOBALG.A.P. Secretariat and the plaintiff. Corrective actions are not made public. The number of complaints per year by crop (i.e., commodity) and country are publicly reported but investigation summaries are not.
1. **Increase civil society representation at the governance level, including standard development.**
   Currently there are no civil society members at a decision-making level (i.e., board, committees or technical working groups). Board and committee members should be representative of economic, social and environmental interests.

2. **Ensure stakeholders’ comments are made public and are given a response.**
   Stakeholders should be able to see how consideration was given, or not, to comments submitted. This enables a transparent decision-making process with a rationale for how input influenced the outcome.

3. **Include stakeholder consultation in the auditing process, including making audits available.**
   Civil society stakeholders should be given the opportunity to provide local expertise and knowledge. Publishing audit reports with conformance results would provide assurance to stakeholders. The confidentiality requirements outlined in the ISO/IEC 17065 standard provide the flexibility to establish expectations that audit information will be published, as per 4.5.1: “The certification body shall inform the client, in advance, of the information it intends to place in the public domain.”

4. **Develop a monitoring and evaluation program.**
   Define a theory of change and M&E program. The M&E process should include stakeholder consultation. Results should help demonstrate to stakeholders the certification’s impacts and effectiveness measured against the theory of change.

5. **Adopt a third-party dispute-settlement mechanism.**
   Internal and external stakeholders should be able to dispute and submit complaints that are investigated through a fair and independent third-party mechanism to ensure conflict of interest is removed.