

# Mauritania small pelagics - purse seine Social Workplan

<b>Workplan Version and Date</b>	<b>Version 3, March 2025</b>
<b>Workplan developed by</b> (consultant or person)	<b>Workplan put together by Jo Gascoigne from two other workplans, developed by LRQA and Partner Africa / IMROP</b>
<b>Start date</b> (expected)	<b>End date</b> (anticipated month/year)
<b>April 2025</b>	<b>December 2028</b>

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## **Acronyms**

AMAM	Maritime Affairs Enforcement Agency
FIP	Fishery Improvement Project
GCM	Mauritanian Coast Guard
IMROP	Mauritanian Oceanographic and Fisheries Research Institute
MPEM	Ministry of Fisheries and Maritime Economy
ONISPA	National Office for Fish Products Sanitary Inspection
SRA	Social Responsibility Assessment Tool for the Seafood Sector

## **Scope of the social workplan**

The Mauritanian industry participants in the Mauritania small pelagics FIP are fishmeal and freezer factories in Mauritania, selling different products from small pelagics to local, regional and international markets. They source from two fleets: i) the coastal seiner fleet and ii) the pirogue seiner fleet. (All fishing is in Mauritanian waters.) This social workplan covers both fleet, and the factories.

The coastal seiner fleet is made up of Turkish- and Mauritanian-flagged vessels. They hire both Turkish and Mauritanian crew (by law the crew must be two-thirds Mauritanian). The captains are mainly Turkish, as are the vessel owners. Vessel operators, or brokers, act as intermediaries to supply these vessels with Mauritanian crew, who work on different types of vessels, depending on the season. The vessel operators also supply the vessels for fishing trips, which last 2-5 days. At full capacity, the fleet comprises up to 40 vessels, but only about 16 were in full operation as of late 2024.

Pirogues are traditional west African vessels (long and narrow, suited for launching through surf). Several thousand pirogues of different sizes operate in Mauritania, but only the largest, called 'pirogue seiners' target small pelagics in significant quantities and sell to the FIP participant factories. There are about 300 of these vessels registered (150 active), which are Mauritanian registered, but may have Senegalese crew. (There are another ~500 Senegalese pirogue seiners, who also fish in Mauritanian waters under a fishing agreement with Senegal, but these land mainly into St. Louis in Senegal, so are not relevant to the FIP.) These vessels make single day trips.

There are around 30 fishmeal factories in Mauritania, although not all are active at any given time. 15 are currently FIP participants. By law, the factories must also include a freezer plant, or other means of processing fish for human consumption, since there are limits on the species and proportion of the catch which are permitted for fishmeal. This is part of the transition from fishmeal supply chains to higher value supply chains for small pelagics, which is at the core of government policy for the sector.

## **Social Risk Assessments**

This workplan is based on two third-party social risk assessments:

- Human Rights Impact Assessment (HRIA) by Partner Africa, supported by the IFFO/SFP Global Roundtable on Marine Ingredients, conducted in 2023 (Partner Africa 2023). This HRIA covered the fishing vessels (including all pirogues) and the factories, but with limited data in places, particularly on the coastal vessels.
- SRA using FisheryProgress methodology (draft version) by LRQA, conducted in late 2024 and focusing particularly on the coastal vessels (LRQA 2025a).

It is important to note here for the record that the outcome of the HRIA was contested in Mauritania by some of the main FIP participants (comments provided by IMROP and by the FIP Steering Committee). Ultimately, the issue is that there is limited objective

information for us to understand the actual situation – hence data collection is a focus on the workplan in the first instance.

Note that all the documents referred to in this workplan (the HRIA, the SRA, the LRQA workplan, the IMROP workplan, Partner Africa's scoping report, comments on the HRIA from the FIP Steering Committee, comments the scoping report from IMROP, external review of the IMROP workplan by Partner Africa) are available on the FIP FisheryProgress pages<sup>1</sup> (see also References section at the end of this document).

## **Workplan preparation**

The FIP social workplan aims to help stakeholders understand the actions a FIP will take to make improvements in its social performance. The actions, when completed, are intended to result in an improvement to the scoring levels of relevant performance indicators (PI) in the FIP's SRA (i.e., meeting the requirements of the next scoring guidepost for that PI). Within the workplan, actions are set out for each issue, and a set of more detailed tasks may be documented for each action, as has been done here.

The FIP was successful in an application to the Sustainable Fisheries Fund for finance to prepare a social workplan based on the HRIA (and we would like to thank them for their support). This work took place in 2024: first Partner Africa converted their HRIA into a scoping document (Partner Africa 2024), then IMROP conducted stakeholder consultations and prepared a social workplan (IMROP 2024). This plan also was contested, this time by Partner Africa (external review, Partner Africa 2025), who considered it insufficiently ambitious.

In addition to this, in late 2024 LRQA and some international FIP participants offered to conduct fieldwork on the coastal vessels (for which information in the HRIA was limited) and prepare a SRA and associated workplan, as a pilot test of the draft SRA methodology. This offer was gratefully received, and the SRA and social workplan for the coastal seiners were provided in early 2025 (LRQA 2025a,b).

This workplan (version 2) is a combined version, which includes the actions from both workplans (IMROP 2024 and LRQA 2025b), in the format requested by FisheryProgress. Actions 1 and 2 are taken directly from the LRQA workplan, while Actions 3-6 are from the IMROP workplan (with some minor re-arrangement, since it is in a different format, and translation from French). Where relevant, the comments by Partner Africa on the IMROP workplan have been incorporated as per the notes in the 'additional information' section for each Action (Actions 3-6).

Note: The IMROP workplan concludes with a series of 'cross-cutting actions' (actions transversales) which are based on those proposed by Partner Africa in the scoping document (Partner Africa 2024), but which do not address any specific PI in the SRA. A review of these actions suggests that the substantive elements of these (i.e. better

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<sup>1</sup> After the update of May 2025

communication, encouragement to other factories to sign up to the FIP, support for audits and certifications, improved traceability, public-private collaboration, external review of the FIP), are already being addressed at the level of the FIP itself. These, therefore, have not been included here, to avoid redundancy and confusion of responsibilities. They remain, of course, available to the team implementing the FIP social activities, for reference or any other purpose – the documents are all publically available.

## **Context**

It is important to bear in mind that Mauritania has its own distinct culture, based deeply in Islam as well as the traditions which permitted their survival in the Sahara desert for many centuries. Cultural norms, rights and values may not be the same as in the west. Until the mid-20th century, slavery was normal and legal, and there remain certain groups, as well as women, who still in practice may not have equal rights.

Mauritania has ratified all of the United Nations International Labour Organization (ILO) conventions on fundamental human rights, but has not ratified the ILO Work in Fishing Convention (No. 188). LRQA (2025a) concluded that Mauritania has a legal framework that aligns with these conventions, although they note questions as to the enforcement of the legislation.

## **HRIA: summary of conclusions**

Note that this assessment does not follow the SRA methodology, and evaluates social risks more broadly than just the FisheryProgress requirements. Risks are identified according to severity (using a traffic light coding) and also as to whether they are 'actual' (known to occur) or 'potential' (not known to occur but the context could allow them to occur).

The main risks identified in the HRIA are:

- Risk of pollution by the factories (right to a healthy environment)
- Risk of reduced availability of small pelagics on the local market
- Labour rights in factories
- Child labour (potential risk on the pirogues)
- Health and safety (noted mainly as an issue on the pirogues)
- Lack of training and reporting mechanisms for abuse and harassment (noted as a potential risk)
- Lack of grievance mechanisms
- Lack of formal contracts for vessel crew and seasonal factory workers

## **SRA: summary of conclusions**

The focus of the SRA was the coastal fleet. According to the SRA, while at the country level there are inherent risks such as hereditary slave labour, child labour, and abuse and

harassment towards women and lower castes, they did not find any evidence that fishing crew are experiencing these risks. There were no egregious violations found during the assessment. The assessment team noted, however, that there is a lack of prevention and mitigation practices to protect workers adequately from these broader risks. They also identified a lack of training and fisher awareness, a lack of transparency and oversight of the vessel brokers, and a lack of contracts which has the effect of limiting fishers' rights to freedom of association.

The conclusions of the two assessments as regards the fishing fleet align quite well, in as much as a focus of the workplan needs to be the formal structures (contracts, reporting mechanisms) and training / awareness raising to ensure that workers are protected.

## Workplan Overview

The scores given for the seiners (coastal fleet) are directly from the LRQA workplan. The scores for the pirogues and factories are from the HRIA, and have been interpreted to some extent, because the scoring system is different. For traffic light risks, yellow and orange are interpreted as 'medium' and red as 'high'. Where the risk is scored as potential rather than actual this is noted.

Note: Performance indicators marked with \* are the Core FisheryProgress SRA Indicators, compulsory for all comprehensive FIPs.

Component	PI	Performance Indicator	Score (Seiners)	Score (pirogues)	Scores (factories)	Action #
		<b>Principle 1: Protect human rights, dignity and access to resources</b>				
1.1 Human and labor rights	1.1.1*	Abuse and harassment	LOW	LOW	Potential	5
	1.1.2a*	Human trafficking and forced labor	HIGH	LOW	LOW	1,2
	1.1.2b*	Debt bondage in small-scale fisheries	n/a	Potential	n/a	6
	1.1.3*	Child labor	LOW	Potential	LOW	6
	1.1.4*	Freedom of association and collective bargaining	HIGH	MEDIUM	MEDIUM	1,2,5
	1.1.5*	Earnings and benefits	HIGH	Potential	Potential (seasonal)	1,2,5
	1.1.6*	Adequate rest	MEDIUM	Potential	Potential (seasonal)	5
	1.1.7a*	Access to basic services for worker housing/ live-aboard vessels	LOW	n/a	n/a	
	1.1.7b	Access to basic services for small-scale fishing communities	n/a	n/a	n/a	
	1.1.8*	Occupational safety	HIGH	HIGH	LOW	1,2,3,5,6
	1.1.9*	Medical response	HIGH	HIGH	LOW	1,2,5,6
1.2 Access Rights	1.2.1*	Customary resource use rights	MEDIUM	n/a	n/a	4
	1.2.2	Corporate responsibility and transparency	Not Assessed	n/a	Not assessed	
		<b>Principle 2: Ensure equality and equitable opportunity to benefit</b>				
	2.1.1*	Grievance reporting and access to remedy	HIGH	MEDIUM	MEDIUM	2,5

2.1 Equality	2.1.2	Stakeholder participation and collaborative management	Not Assessed	Not Assessed	Not Assessed	
2.2 Equity	2.2.1	Equitable opportunity to benefit	Not Assessed	Not Assessed	Not Assessed	
	2.2.2*	Discrimination	MEDIUM	LOW	Potential	5
		<b>Principle 3: Improve food, nutrition, and livelihood security</b>				
3.1 Food and nutrition security	3.1.1a	Food and nutrition security impacts of industrial fisheries	Not Assessed	n/a	Potential	4
	3.1.1b	Food and nutrition security for small-scale fishing communities	Not Assessed	n/a	Potential	4
	3.1.2	Healthcare	Not Assessed	Not Assessed	Not Assessed	
	3.1.3	Education	Not Assessed	Not Assessed	Not Assessed	
3.2 Livelihood security	3.2.1	Benefits to and within community	Not Assessed	n/a	HIGH (pollution)	3
	3.2.2	Economic value retention	Not Assessed	Not Assessed	Not Assessed	
	3.2.3	Long term profitability and future workforce	Not Assessed	Not Assessed	Not Assessed	
	3.2.4	Economic flexibility and autonomy	Not Assessed	Not Assessed	Not Assessed	
	3.2.5	Livelihood security	Not Assessed	n/a	HIGH (local market)	4
	3.2.6	Fuel resource efficiency	Not Assessed	Not Assessed	Not Assessed	



## Actions

### 1. Action # 1 Vessel Broker Registration

<b>Action Goal</b>	Design oversight mechanism for vessel operators (brokers).
<b>Action Description</b>	<p>Vessel brokers are ultimately responsible for the terms and conditions under which crew on the coastal vessels work. Turkish companies rely on brokers to hire labour, ensuring that they comply with legislation stipulating that for every Turkish crew member, they must hire at least 2 Mauritanian crew. There are reportedly known bad actors, but there is no oversight mechanism for the activities of the vessel brokers.</p> <p>Therefore, we propose to establish a minimum set of requirements for labour brokers and create a register whereby local authorities and Turkish companies can monitor activities of labour brokers more closely</p>
<b>Status</b>	Not yet started
<b>Start Date</b>	September 2025
<b>Completion Date</b>	August 2028
<b>Priority</b>	HIGH
<b>Estimated Cost</b>	
<b>Responsible Parties</b>	FIP, consultants, AMAM
<b>SRA PI(s) Addressed by the Action</b>	1.1.2a, 1.1.4, 1.1.5, 1.1.8, 1.1.9
<b>MSC PI(s) Addressed by the Action</b>	n/a
<b>Supporting Documentation</b>	SRA Final Report, February 2025 (LRQA 2025)
<b>Additional Information</b>	
<p>Broker registration and requirements would help to mitigate risks of several SRA indicators found to be high risk for the coastal seiners:</p> <ol style="list-style-type: none"> <li>1) Recruitment (1.1.2a): Ensuring that there is a clear process for workers to be recruited ethically, and to allow the Turkish companies to work with known good actors. Furthermore, this would support government to oversee activities and monitor bad actors more closely.</li> <li>2) Contracts (1.1.2a, 1.1.4, 1.1.5): One of the main issues for crew currently is that many do not have contracts. This is not only important if they want to lodge complaints with the Labour Inspectorate, but is also an issue because in order</li> </ol>	

<p>to join local unions, they must have a contract. Furthermore, brokers may avoid contracts so as to avoid requirements to provide employees with benefits.</p> <p>3) Training (1.1.4, 1.1.5, 1.1.8, 1.1.9, 2.1.1): Many of the disputes and complaints crew mentioned could all lead back to the fact that there is very little attention paid to worker awareness training, whether that's on their terms and conditions, health and safety, union representation, or access to grievance. We propose to include a requirement for brokers to be training workers they hire to guarantee they are getting the information they need, whereas currently, no entity is taking responsibility for this.</p>		
Progress Reporting <i>(add a new row for each new progress report)</i>		
Date	Supporting Documentation Filename(s)	Update/Results

#### 1.1 Task #1.1 Establish Minimum Requirements for Vessel Operators (Brokers)

Task Description	Define a set of minimum requirements for vessel operators	
Status	Not yet started	
Start Date	September 2025	
Completion Date	August 2026	
Responsible Parties	FIP, consultants, AMAM	
Additional Information		
Progress Reporting		
Date	Supporting Documentation Filename(s)	Update/Results

#### 1.2 Task #1.2 Define oversight of vessel operators

<b>Task Description</b>	Produce a 'handbook' with a set of enforcement, tracking and monitoring measures for relevant authorities to monitor the activities of brokers
<b>Status</b>	Not yet started
<b>Start Date</b>	September 2026

Completion Date	August 2027	
Responsible Parties	FIP, consultants, AMAM	
Additional Information		
Progress Reporting		
Date	Supporting Documentation Filename(s)	Update/Results

### 1.3 Task #1.3 Engage with Turkish companies and vessel owners

Task Description	Work with the Turkish companies (and other vessel owners) to ensure active participation and enforcement of minimum requirements	
Status	Not yet started	
Start Date	September 2026	
Completion Date	August 2027	
Responsible Parties	FIP, consultants, AMAM	
Additional Information		
Progress Reporting		
Date	Supporting Documentation Filename(s)	Update/Results

### 1.4 Task #1.4 Pilot

<b>Task Description</b>	Pilot the minimum requirements with a set of selected vessel operators, and provide training and implementation support	
<b>Status</b>	Not yet started	
<b>Start Date</b>	September 2027	
<b>Completion Date</b>	August 2028	
<b>Responsible Parties</b>	FIP, consultants, AMAM	

Additional Information		
Progress Reporting		
Date	Supporting Documentation Filename(s)	Update/Results

## 2. Action # 2 Crew training

Action Goal		Coastal fleet crew are aware of their rights, terms and conditions of employment, health and safety, access to unions and grievance mechanism
Action Description		Although the goal is to have vessel brokers take accountability for training of crew, it is important to facilitate training in the interim. During the fishing season the FIP will provide training for Mauritanian crew that cover terms and conditions of employment (including legal minimums), basic health and safety, and access to unions/associations and where/how to report grievances.
Status		Not yet started
Start Date		September 2025
Completion Date		December 2026 (ongoing as required depending on progress of Action 1)
Priority		HIGH
Estimated Cost		
Responsible Parties		FIP, consultants, AMAM
SRA PI(s) Addressed by the Action		1.1.2a, 1.1.4, 1.1.5, 1.1.8, 1.1.9
MSC PI(s) Addressed by the Action		n/a
Supporting Documentation		SRA Final Report, February 2025 (LRQA 2025)
Additional Information		
Progress Reporting <i>(add a new row for each new progress report)</i>		
Date	Supporting Documentation Filename(s)	Update/Results

## 2.1 Task #2.1 Design curriculum and materials

Task Description	Define a curriculum and materials in appropriate languages, to form the basis of initial crew training.	
Status	Not yet started	
Start Date	September 2025	
Completion Date	December 2026	
Responsible Parties	FIP, consultants, AMAM, unions	
Additional Information		
Note it is recommended to engaged with the unions to better understand the role they might have in providing support and training for crew.		
Progress Reporting		
Date	Supporting Documentation Filename(s)	Update/Results

## 2.2 Task #2.2 Provide training to crew

Task Description	Provide training at appropriate moments when crew are onshore and available	
Status	Not yet started	
Start Date	September 2025	
Completion Date	December 2026	
Responsible Parties	FIP, consultants, AMAM, unions	
Additional Information		
Progress Reporting		
Date	Supporting Documentation Filename(s)	Update/Results

## 3. Action # 3 Pollution

<b>Action Goal</b>	Ensure all regulations on pollution and waste disposal are respected
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Action Description		There will be an external audit of all the participating factories, for waste water quality, odours from smoke stacks and solid waste disposal. Based on the results of this audit, we will supply training and support as required, in collaboration with ONISPA.
Status		Not yet started
Start Date		September 2025
Completion Date		December 2027
Priority		HIGH
Estimated Cost		
Responsible Parties		FIP participating factories, FIP, ONISPA or external auditors
SRA PI(s) Addressed by the Action		1.1.8 (indirect), 3.2.1
MSC PI(s) Addressed by the Action		n/a
Supporting Documentation Filename(s)		HRIA (Partner Africa 2023), FIP social workplan (IMROP 2024)
Additional Information		
Partner Africa’s comments on the IMROP workplan note the importance of an independent, external audit, and this has been added here. It could be by ONISPA or by external third-party auditors – to be determined.		
Progress Reporting <i>(add a new row for each new progress report)</i>		
Date	Supporting Documentation Filename(s)	Update/Results

### 3.1 Task 3.1 Pollution audit of factories

<b>Task Description</b>	External audit of FIP participant factories for waste water quality, solid waste disposal system and smoke / odour emissions
<b>Status</b>	Not yet started
<b>Start Date</b>	September 2025
<b>Completion Date</b>	September 2026
<b>Responsible Parties</b>	ONISPA or external auditor

Additional Information		
To be discussed with ONISPA whether this action is implemented by them, with support from the FIP, or by an external consultant validated by ONISPA.		
Progress Reporting		
Date	Supporting Documentation Filename(s)	Update/Results

### 3.2 Task #3.2 Pollution regulation and enforcement

Task Description	Review the regulations on fishmeal factories around pollution and the environment to ensure they are consistent with best practice, and are being enforced	
Status	Not yet started	
Start Date	September 2025	
Completion Date	September 2026	
Responsible Parties	FIP / ONISPA	
Additional Information		
ONISPA is the organisation responsible for determining and enforcing these regulations.		
Progress Reporting		
Date	Supporting Documentation Filename(s)	Update/Results

### 3.3 Task #3.3 Factory improvement

Task Description	Support any participating factories to improve their waste and pollution management, according to the results of the audit (Task 3.1)
Status	Not yet started
Start Date	September 2025
Completion Date	December 2027
Responsible Parties	FIP / ONISPA
Additional Information	

Progress Reporting		
Date	Supporting Documentation Filename(s)	Update/Results

#### 4. Action # 4 Access to fish on the local market

Action Goal	Ensure that fishmeal production is not impacting the local market in terms of supply and price of small pelagics	
Action Description	Evaluate local supply chains for fish products, estimate requirements in terms of volume and price needed to support food security, and adjust management accordingly	
Status	Not yet started	
Start Date	September 2025	
Completion Date	December 2028	
Priority	High	
Estimated Cost		
Responsible Parties	FIP, IMROP, MPEM, SNDP	
SRA PI(s) Addressed by the Action	1.2.1, 3.1.1(a), 3.1.1(b), 3.2.5	
MSC PI(s) Addressed by the Action	n/a	
Supporting Documentation	HRIA (Partner Africa 2023), FIP social workplan (IMROP 2024)	
Additional Information		
Partner Africa, in their comments, consider that further evaluation of supply chains is not required; however the FIP team respectfully disagree – we have found it difficult to find quantitative, robust and reliable figures on these supply chains up till now. We do accept their point that the study should not be a substitute for action if required. We note, however, that there is a limit to which a small FIP can intervene in an entire economy.		
Progress Reporting <i>(add a new row for each new progress report)</i>		
Date	Supporting Documentation Filename(s)	Update/Results

##### 4.1 Task #4.1 Evaluate supply chains



Task Description	Evaluate local supply chains for small pelagics for human consumption, their role in food security and the main drivers of price and availability	
Status	Not yet started	
Start Date	September 2025	
Completion Date	September 2026	
Responsible Parties	FIP, IMROP	
Additional Information		
Progress Reporting		
Date	Supporting Documentation Filename(s)	Update/Results

#### 4.2 Task #4.2 Review of management

Task Description	According to the results of 4.1, review the management of small pelagics, in terms of the quotas and species available for fishmeal vs human consumption, and other regulations as relevant, and make recommendations as to how to adjust, to ensure that supply on the local market is sufficient for food security	
Status	Not yet started	
Start Date	September 2026	
Completion Date	December 2028	
Responsible Parties	FIP, IMROP, SNDP, MPEM	
Additional Information		
Progress Reporting		
Date	Supporting Documentation Filename(s)	Update/Results

#### 5. Action # 5 Employment conditions in factories

Action Goal	Ensure employment conditions in the factories comply with the regulations	
Action Description	Audit working conditions, pay and contracts, grievance / complaints mechanisms and health and safety in the FIP factories; support improvements where required	
Status	Not yet started	
Start Date	September 2025	
Completion Date	September 2026	
Priority	High	
Estimated Cost		
Responsible Parties	FIP, AMAM	
SRA PI(s) Addressed by the Action	1.1.1, 1.1.4, 1.1.5, 1.1.6, 1.1.8, 1.1.9, 2.1.1, 2.2.2	
MSC PI(s) Addressed by the Action	n/a	
Supporting Documentation	HRIA (Partner Africa 2023), FIP social workplan (IMROP 2024)	
Additional Information		
We are at present unclear whether the responsibilities of AMAM for the fisheries sector extend to the factories, or whether there is another external body responsible for labour standards on land. To be clarified at the start of implementation.		
Progress Reporting <i>(add a new row for each new progress report)</i>		
Date	Supporting Documentation Filename(s)	Update/Results

### 5.1 Task #5.1 Factory audits

<b>Task Description</b>	External audit of FIP factory employment practices and health and safety, including interviews with employees (permanent and seasonal)
<b>Status</b>	Not yet started
<b>Start Date</b>	September 2025
<b>Completion Date</b>	March 2026
<b>Responsible Parties</b>	FIP, AMAM or external consultant
<b>Additional Information</b>	

Progress Reporting		
Date	Supporting Documentation Filename(s)	Update/Results

## 5.2 Task #5.2 Factory harassment, discrimination and abuse – policies

Task Description	The FIP will provide examples of grievance mechanisms which are suitable for the context; factory management and employees will be provided training on how to deal with harassment, discrimination, abuse and other grievances, and will ensure that employees are aware of their rights.	
Status	Not yet started	
Start Date	April 2026	
Completion Date	December 2027	
Responsible Parties	FIP, AMAM or external consultant	
Additional Information		
Progress Reporting		
Date	Supporting Documentation Filename(s)	Update/Results

## 5.3 Task #5.3 Factory contracts, working hours and human resource management

Task Description	FIP factories will be provided with support to improve human resource practices, according to the results of the audits (Task 5.1)
Status	Not yet started
Start Date	April 2026
Completion Date	December 2027
Responsible Parties	FIP, AMAM or external consultant
Additional Information	
Progress Reporting	

Date	Supporting Documentation Filename(s)	Update/Results

#### 5.4 Task #5.4 Factory health and safety

Task Description	The FIP factories will provide training on the use of PPI and health and safety at work to all their employees (permanent or seasonal)	
Status	Not yet started	
Start Date	September 2025	
Completion Date	December 2028 (ongoing, periodic)	
Responsible Parties	FIP, AMAM or external consultant	
Additional Information		
Progress Reporting		
Date	Supporting Documentation Filename(s)	Update/Results

#### 6. Action # 6 Conditions on pirogues, including risk of child labour

<b>Action Goal</b>	Crew on the pirogues landing to the factories includes no minors, are not suffering from debt bondage, and work in appropriate conditions
<b>Action Description</b>	Ensure that the pirogues landing to FIP factories have opportunities to improve conditions for their crew and their children
<b>Status</b>	Not yet started
<b>Start Date</b>	September 2025
<b>Completion Date</b>	December 2028
<b>Priority</b>	High
<b>Estimated Cost</b>	
<b>Responsible Parties</b>	FIP, AMAM, GCM
<b>SRA PI(s) Addressed by the Action</b>	1.1.2b, 1.1.3, 1.1.8, 1.1.9

<b>MSC PI(s) Addressed by the Action</b>		n/a
<b>Supporting Documentation</b>		HRIA (Partner Africa 2023), FIP social workplan (IMROP 2024)
<b>Additional Information</b>		
The pirogue crews are in the majority Senegalese, and have their own recruitment, payment and family traditions and systems based in their traditional cultural practices. Partner Africa notes, that, traditional or not, child labour is highly damaging, and we acknowledge this. However, the scope of the FIP means that we have no possibility to intervene at the level required to eliminate the practice as a whole. (We are not the World Bank.) In terms of the FIP, the HRIA found a potential risk of child labour rather than actual evidence. The aim of this action is therefore to eliminate this risk, and ensure that minors are not taken to sea in the vessels supplying the FIP factories; as well as ensuring that the crews have access to the resources needed for decent working conditions (e.g. protective and safety equipment).		
<b>Progress Reporting (add a new row for each new progress report)</b>		
<b>Date</b>	<b>Supporting Documentation Filename(s)</b>	<b>Update/Results</b>

#### 6.1 Task #6.1 Child labour code of conduct

Task Description	Pirogues supplying FIP factories will be asked to accept a code of conduct on child labour, asking them to verify that all crew members are adults	
Status	Not yet started	
Start Date	September 2025	
Completion Date	December 2028 (ongoing for all new contracts)	
Responsible Parties	FIP factories, AMAM, GCM	
Additional Information		
Progress Reporting		
Date	Supporting Documentation Filename(s)	Update/Results

#### 6.2 Task #6.2 Pirogue health and safety

Task Description	Pirogues supplying FIP factories will be audited to ensure that the crew have access to health and safety equipment, including waterproofs, gloves, life jackets, flares, communication devices and other safety equipment, fire extinguishers, first aid equipment, navigation equipment etc. (definitive list to be drawn up). Equipment and training to be provided if required.	
Status	Not yet started	
Start Date	September 2025	
Completion Date	December 2028 (ongoing)	
Responsible Parties	GCM, AMAM, FIP factories	
Additional Information		
Partner Africa notes the importance of keep track of who has been trained – the FIP will ensure that this is done.		
Progress Reporting		
Date	Supporting Documentation Filename(s)	Update/Results

### 6.3 Task #6.3 Debt bondage in the pirogues

Task Description	A questionnaire survey will establish the extent of this issue in the pirogue fleet; since their home base is in Senegal it is unclear for the moment if it is widespread and if so what can be done, but an evaluation of the risk is the starting point.	
Status	Not yet started	
Start Date	September 2025	
Completion Date	December 2026	
Responsible Parties	FIP, IMROP, external consultant	
Additional Information		
Partner Africa consider that this survey should be conducted by someone independent, which is noted here.		
Progress Reporting		
Date	Supporting Documentation Filename(s)	Update/Results

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## References

IMROP 2024. Commentaires IMROP sur le plan d'action social et environnemental.

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