

Hawaii Longline Association

**CODE OF CONDUCT FOR
DECENT WORK IN FISHING**

February 16, 2018

Executive Summary

Hawaii Longline Association (HLA) member vessel owners provide decent work in fishing and provide all crewmen a safe workplace. The *Code of Conduct for Decent Work in Fishing* was developed to achieve transparency, understanding and mutual agreement between vessel owners, captains, foreign crewmen and labor agencies in the sending countries of the crewmen. The Code is designed to verify fair and transparent recruiting and employment practices to continue to provide decent work in fishing, protect workers and prevent forced labor.

This is an employer code developed to align with the United Nations International Labor Organization definition of forced labor (ILO Convention 29), ILO Work in Fishing Convention No. 188 and definitions from the U.S. Department of Labor. The Code clarifies the “do’s and don’ts” of recruitment, costs of work, payment, passport/ID access, onboard health and safety, freedom of movement in the workplace, repatriation and grievance mechanisms. The Code specifies minimum terms to protect workers from the very beginning of the recruitment process to repatriation at the end of completed contracts.

The Code is linked directly with a *Model Crew Contract* for use by all HLA member vessel owners and crewmen, and a *Crew Handbook* that explains to the crewmen the workplace, the work, fishing operations, provisions within the Code, details of the contract and grievance mechanisms. Crew Contracts and Handbooks are written in English and have been translated into the first languages of the workers from Vietnam, Philippines, Indonesia and Kiribati.

The Code is a voluntary instrument for employers (vessel owners and captains) and labor agencies. Compliance with the Code benefits workers, employers and agents as the vulnerabilities and possible exposures to modern slavery, forced labor and human trafficking are monitored and controlled. The Code adds new oversight for the verification of labor safety, while working with and not supplanting the jurisdiction of the competent regulatory authorities (ex. U.S. Customs and Border Protection, U.S. Department of Homeland Security, U.S. Coast Guard).

The Code was prepared by the Hawaii Longline Association, the United Fishing Agency and the Hawaii Seafood Council with technical assistance provided by Katrina Nakamura PhD (Sustainability Incubator) and John Kaneko MS, DVM (Hawaii Seafood Council).

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Why is a Code of Conduct for Decent Work in Fishing needed?

The U.S. seafood market is dominated by imported wild-caught and farm-raised seafood. With over 90% of the seafood supply in the U.S. being imported, credible methods for tracing, monitoring, verifying and documenting the flow of seafood products are needed. Seafood, as well as other products such as wood, textiles, garments, electronics and food face scrutiny regarding environmental impacts and social impacts on workers and communities. Supply chains of raw materials and finished products extending from primary producers to consumers are often complex, lack transparency and traceability.

The supply chain of foreign workers who legally work as crewmen on commercial fishing vessels in Hawaii is under scrutiny for uncertain labor recruiting practices, contracts, worker treatment and unsubstantiated allegations of forced labor and human trafficking. The Hawaii Longline Association has taken the proactive and responsible voluntary action to demonstrate the fair labor practices and decent work it provides for foreign workers.

The following principles and requirements of the Code of Conduct are consistent with the United Nations International Labor Organization (UN-ILO) and the U.S. Department of Labor Bureau of International Labor Affairs (DOL-ILAB) definitions and criteria for the prevention of Forced Labor, Debt Bondage and Human Trafficking.

At its core, the objective of this Code is to ensure that workers have decent work, are treated fairly, humanely and are safe from forced labor and human trafficking from the time they are recruited for jobs in the sending countries, through transportation to the workplace, while they are working on Hawaii fishing vessels and until they safely return to their countries of origin.



Commitment to Social Responsibility

The Hawaii Longline Association (HLA) strictly prohibits forced labor and human trafficking by its members, labor agencies (if used), and the owners and captains of Hawaii-based longline fishing vessels. Workers shall not be subjected to any form of forced, compulsory, bonded, or indentured labor. All work shall be voluntary. All workers shall have the freedom to terminate their employment at any time without penalty upon giving reasonable notice.

Purpose of the Code

The Code of Conduct for Decent Work in Fishing has been developed for and adopted by the Hawaii Longline Association. The Code establishes the core objectives and the basic performance expectations to meet those objectives for labor recruiters, labor agencies and Hawaii longline fishing vessel owners (employers) for the monitoring and prevention of forced labor and human trafficking.

Objectives of the Code

Objective 1: Workers in the Hawaii longline fishing industry are protected from, 1) Forced Labor, 2) Human Trafficking and 3) Inhumane Treatment and 4) Unfair Recruitment practices from the beginning of the recruitment process and in the workplace.

Objective 2: Workers in the Hawaii longline fishing industry are not indebted from the start of the recruitment process to the end of their contracts.

Commitment to the Code

All Hawaii Longline Association members must adopt this voluntary Code with written assurance to maintain membership in good standing. All labor agencies used by Hawaii Longline Association members must adopt the Code and provide written assurance.

Monitoring and Enforcement of the Code

The Hawaii Longline Association shall ensure a management system capable of monitoring and enforcing vessel owners' compliance with the Code.

Process of Continual Improvement of the Code

The Code obligations are not exhaustive. The minimum requirements or remedies for employers (vessel owners) required by the Code shall not be considered exhaustive of efforts to ensure social responsibility. The Hawaii Longline Association encourages and shall facilitate continual improvement in providing decent work in fishing in consultation with relevant experts and stakeholders.

Definitions

Contracts are legal work agreements with labor duties and payment clearly spelled out^{1,2}. Details of the position, expected duties, and payment level should be specified so workers are clear on their position and consistently understood with recruiters and vessel owners.

Costs are all costs for getting to the work place and while working onboard. These may include placement/broker fees, travel to the workplace, visa, medical, safety gear and food at the workplace, remittance fees, repatriation costs and any deductions.

Fair Recruitment refers to ways crew find work on foreign fishing vessels through labor agencies in their home countries, in fair ways which protect their rights. Vessel owners are responsible for the crew's safety as they get to work and home again. This includes the labor agencies and their representatives who may not charge prohibited recruitment fees³.

Forced labor The International Labor Organization's (ILO) Convention 29 on Forced Labor defines forced or compulsory labor as: "all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily." (Also refer to the United Nations [Palermo Protocol](#) on Trafficking in Persons)

Grievance mechanisms are ways crew can get help if a breach occurs. Crew need safe grievance mechanisms to express concerns without the fear of retaliation. This may include a "hotline" to call for assistance in their own languages while in port and effective means of ship to shore communication if something occurs at sea.

Labor recruiter refers to both public employment services and to private employment agencies and all other intermediaries or subagents that offer labor recruitment and placement services. Labor recruiters can take many forms, whether for profit or non-profit, or operating within or outside legal and regulatory frameworks. (Source: Outcome of the Meeting of Experts on Fair Recruitment, http://www.ilo.org/wcmsp5/groups/public/---ed_norm/---relconf/documents/meetingdocument/wcms_532389.pdf)

¹ For example, in the H-2A and H-2B temporary nonimmigrant guestworker programs, workers must receive written information about the wages, hours, working conditions, and benefits of the job in a language they understand prior to getting a visa. See 20 CFR 655.122(q) (H-2A); 20 CFR 655.20(l) (H-2B).

² The Department of Labor advises that written contracts should make work terms clear including timing, min/max hours covered by the wages, personal leave, payment provisions during illness, and repatriation. It should be definitively stated that food and beverage, safety and sleeping quarters are excluded from crew's remuneration. It is especially important for any contract to provide for robust monitoring and enforcement, whether directly or via an associated universal code of conduct.

³ While there is no internationally recognized definition of recruitment fees, examples of prohibited recruitment fees can be found in U.S. law and the H-2A and H-2B temporary nonimmigrant guestworker programs. They include fees for the employer's attorneys and agents, placement and referral fees, and any fee that must be paid as a condition of accessing the job opportunity. See 20 CFR 655.135(j) (H-2A); 20 CFR 655.20(o) (H-2B); DOL Wage and Hour Division Field Assistance Bulletin No. 2011-2, H-2A "Prohibited Fees" and [Employer's Obligation to Prohibit Fees](#) and the ILO's "[Fair Recruitment Initiative](#)" which provides a variety of tools on this topic.

Modern slavery encompasses human trafficking, the sale of a human being, and forced labor. (Refer to the [Palermo Protocol](#)).

Occupational safety and health is the vessel owner's responsibility, without taking any deductions. Safety equipment, hygiene onboard, safe handling and environmental exposures, first aid, medical attention, food and water are included.

Payments are all terms, conditions, and timing for payment to crew from vessel owners (employers) and from labor agencies. Workers must clearly understand their payment and terms of employment.

Recruitment includes the advertising, information dissemination, selection, transport, placement into employment and –for migrant workers- return to the country of origin where applicable. This applies to both jobseekers and those in an employment relationship. (Source: Outcome of the Meeting of Experts on Fair Recruitment, http://www.ilo.org/wcmsp5/groups/public/---ed_norm/---relconf/documents/meetingdocument/wcms_532389.pdf)

Recruitment fees or related costs refer to any fees or costs incurred in the recruitment process in order for workers to secure employment or placement, regardless of the manner, timing or location of their imposition or collection. (Source: Outcome of the Meeting of Experts on Fair Recruitment, http://www.ilo.org/wcmsp5/groups/public/---ed_norm/---relconf/documents/meetingdocument/wcms_532389.pdf)

Recruitment fees include, but are not limited to, fees, charges, costs, assessments, or other financial obligations assessed against employees or potential employees, associated with the recruiting process, regardless of the manner of their imposition or collection—

- (i) For soliciting, identifying, considering, interviewing, referring, retaining, transferring, selecting, testing, training, providing new-hire orientation, recommending, or placing employees or potential employees;
- (ii) For covering the cost, in whole or in part, of advertising;
- (iii) For any activity related to obtaining permanent or temporary labor certification;
- (iv) For processing petitions;
- (v) For visas and any fee that facilitates an employee obtaining a visa such as appointment and application fees;
- (vi) For government-mandated costs such as border crossing fees;
- (vii) For procuring photographs and identity documentation, including any nongovernmental passport fees;
- (viii) Charged as a condition of access to the job opportunity, including procuring medical examinations and immunizations and obtaining background, reference and security clearance checks and examinations; additional certifications;
- (ix) For an employer's recruiters, agents or attorneys, or other notary or legal fees; and
- (x) For language interpreters or translators.

(2) Any fee, charge, cost, or assessment may be a recruitment fee regardless of whether the payment is in property or money, deducted from wages, paid back in wage or benefit concessions, paid back as a kickback, bribe, in-kind payment, free labor, tip, or tribute, remitted in connection with recruitment, or collected by an employer or a third party, including, but not limited to—

- (i) Agents;
- (ii) Recruiters;
- (iii) Staffing firms (including private employment and placement firms);
- (iv) Subsidiaries/affiliates of the employer;
- (v) Any agent or employee of such entities; and
- (vi) Subcontractors at all tiers.

(Source: Federal Acquisition Regulation: Combating Trafficking in Persons— Definition of “Recruitment Fees,” <https://www.gpo.gov/fdsys/pkg/FR-2016-05-11/pdf/2016-11056.pdf>)

Timely Passport Access means crew must have free and timely access to their passports and identity documents. The ways crew may access their ID at sea and at port must be defined.

Universal Code of Conduct provides the minimum rules vessel owners should take to specify, define and protect crew rights and entitlements. The code specifies the oversight authority for each rule and suggests procedures. The code is independent and transparent and backed by monitoring and remediation mechanisms to comply with international labor standards.

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CODE Principle	CODE Principles for Crew: Rights & Entitlements	CODE Responsibilities for Employers
<i>1. Prevention of Child Labor</i>	Workers are at least 18 years old. Employer shall have a clear age verification process.	Employers shall make certain workers are at least 18 years old based on passport checks by CBP.
<i>2. Recruitment Fees</i>	Workers shall not be charged any fees or costs for recruitment.	Employer shall pay any recruitment fees.
<i>3. Transportation Expenses</i>	Workers do not bear costs of travel to the workplace or repatriation at the end of their contracts.	Employers shall bear the costs of travel to the workplace and repatriation of workers at the end of their contracts.
<i>4. Payment and Benefits</i>	Workers are not required to pay costs for work. Workers are not subjected to deductions from their payment. Workers are not subjected to punitive fines to force them to remain on the job.	Employers shall not require workers to pay costs for work. Employers shall not make deductions from worker's payment. Employers shall not require workers to remain on the job with punitive costs.
<i>5. Employment Contracts</i>	Workers are informed and have a clear understanding of their payment and terms of employment based on written contracts.	Employers shall ensure crew clearly understand their payment and terms of employment. Contracts must be in the language of the worker and in English.
<i>6. Retention of Personal Documents</i>	Workers have free and timely access to their passports and identification documents. Destroying, withholding or otherwise denying workers' access to the identity documents is strictly prohibited.	Employers shall comply with US Customs and Border Patrol policy to provide workers with free and timely access to their passports and identification documents.
<i>7. Health and Safety</i>	Workers are provided with a safe and hygienic work place, adequate food and water, and ship to shore communication for emergencies. Workers are provided with medical care during work contracts.	Employers shall maintain a workplace meeting occupational safety and health requirements for a safe vessel, hygienic facilities, adequate food and water, and ship to shore communications for emergencies. Employers shall pay for workers' medical care during their work contracts.
<i>8. Freedom of Movement</i>	Workers have unrestricted access to basic necessities (clean drinking water and sanitary facilities) at all times. Worker's freedom of movement in the workplace is not unreasonably restricted.	Employers shall not unreasonably restrict workers' access to clean drinking water and sanitary facilities. Employers shall not unreasonably restrict movement onboard or on shore within the port area.
<i>9. Labor agencies</i>	Labor agencies must be registered and in good standing in their countries of origin.	Employers shall confirm the status of the labor agencies and only use those in good standing. Agencies in good standing must have adopted (in writing) the Hawaii Code of Conduct.
<i>10. Workplace Equality</i>	All workers, irrespective of their nationality or legal status, shall be treated fairly and equally. Migrant workers shall benefit from conditions of work no less favorable than those available to country nationals.	Employers shall treat all workers fairly and equally in the workplace. Migrant workers shall be treated no less favorably than country nationals.
<i>11. Work and Rest periods</i>	Work hours on fishing vessels are long and irregular by nature. Workers shall be given rest periods and be treated equally regardless of nationality.	Employers shall manage crew work/rest periods and treat workers equally regardless of nationality. Captains shall give crew rest periods of sufficient length to ensure safety and health.
<i>12. Employee awareness and training</i>	Workers are given a Crew Handbook describing the work place, expectations of the work contract period, living conditions and worker rights.	Employers shall make certain all workers have a copy of the Crew Handbook as an attachment to their contracts.

Hawaii Code of Conduct for Decent Work in Fishing: Principles, Responsibilities and Remedies					
Criteria	Definitions	CODE Principle	CODE Responsibilities for Employers	CODE Guidance for Employers on Remedy Procedures and Tools	Oversight authority
<i>Recruitment</i>	<i>Recruitment</i> is how foreign crew find fishing work through labor agencies in their home countries.	<p>1. Workers are at least 18 years old.</p> <p>2. Workers are protected in the workplace and from the beginning of the recruitment process.</p> <p>3. Workers are not indebted from the beginning of the recruitment process to the end of their contracts.</p>	<p>1. Employers shall make certain workers are at least 18 years old.</p> <p>2. Employers shall make certain workers are protected from the beginning of the recruitment process through the completion of their contracts.</p> <p>3. Employers shall make certain workers are not indebted from the beginning of the recruitment process to the completion of their contracts.</p>	<p>1. Make certain labor agents check the age of workers. Confirm the age of the worker prior to arrival to the workplace.</p> <p>2. Confirm labor agency’s legal standing/license.</p> <p>3. Provide labor agencies with Code requirements regarding <i>Recruitment</i>.</p> <p>4. Obtain the agency’s Letter of Agreement to comply with the Code requirements.</p> <p>5. Provide workers with Crew Handbook (an orientation document in their language explaining the Code requirements regarding <i>Recruiting</i>.)</p> <p>6. Obtain a copy of the crew contract with the labor agency.</p> <p>7. Review all crew costs and terms in the agency contracts for any prohibited or excessive recruitment fees.</p> <p>8. Ensure a medical examination with a health certificate attesting to fitness to perform duties is completed before departure to the work place.</p>	<p>Vessel owners or captains.</p> <p>Labor agencies.</p> <p>Hawaii Longline Association shall maintain list of vessels compliant with the Code based on annual vessel audits.</p>
<i>Costs while fishing</i>	<i>Costs</i> for work onboard include gear, safety, medical, and food.	<p>4. Workers are not required to pay costs for work.</p> <p>5. Workers are not subjected to deductions from payment.</p> <p>6. Workers are not subjected to punitive fines to force them to remain on the job.</p>	<p>4. Employers shall not require workers to pay costs of work.</p> <p>5. Employers shall not make deductions from the worker’s payment.</p> <p>6. Employers shall not require workers to remain on the job with punitive costs.</p>	<p>1. Provide labor agencies with Code requirements regarding <i>Costs while fishing</i>.</p> <p>2. Obtain the agency’s Letter of Agreement to comply with the Code requirements.</p> <p>3. Provide workers with Crew Handbook (an orientation document in their language explaining the Code requirements regarding <i>Costs while fishing</i>.)</p> <p>4. Review crew contracts with the labor agency for any prohibited costs (including medical costs, work and safety gear, food and water).</p> <p>5. Maintain record of payments signed by the crew and employer.</p>	<p>Vessel owners or captains.</p> <p>Labor agencies.</p> <p>Hawaii Longline Association shall maintain list of vessels compliant with the Code based on vessel annual audits.</p>

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Criteria	Definitions	CODE Principle	CODE Responsibilities for Employers	CODE Guidance for Employers on Remedy Procedures and Tools	Oversight authority
<i>Payment</i>	<i>Payment</i> is how, when, and how much crew are paid for work.	7. Workers are paid as agreed and have a clear understanding of their payment and terms of employment.	7. Employers shall ensure crew clearly understand their payment and terms of employment.	<ol style="list-style-type: none"> 1. Provide crew with Crew Handbook (an orientation document in their language explaining the Code requirements regarding <i>Payment</i>.) 2. Obtain the employer’s (vessel owner) Letter of Agreement to comply with the Code requirements. 3. Obtain and review contracts between labor agencies and crew, vessel owners and crew and labor agencies and vessel owners. 4. Payment to crew shall be at least the base amount specified in the crew contract with the labor agency. Higher amounts (including catch share incentives) agreed to by vessel owners’ and crew prevail over labor agency amounts onboard US vessels. 5. There shall be no withholding portions of workers’ pay unless it is legally required. 6. Employer shall maintain records of payments signed by the crew and employer. 	<p>Vessel owner and captains.</p> <p>Hawaii Longline Association shall maintain list of vessels compliant with the Code based on annual vessel audits.</p>
<i>Access to Passport and Identification documents</i>	<i>Access to Passport and Identification documents</i> means that workers have access to their personal identification documents at sea and in port on request.	8. Workers have free and timely access to passports and identity documents.	8. Employers shall provide workers with free and timely access to their passports and identification documents on request.	<ol style="list-style-type: none"> 1. Provide crew with Crew Handbook (an orientation documents in their language explaining the Code requirements regarding access to <i>Passports and ID documents</i>.) 2. Obtain the employer’s (vessel owner) Letter of Agreement to comply with the Code requirements. 3. CBP requires vessel owners to hold crew passports but CBP needs to make copies for crew to keep onboard. 4. Workers shall know how to request and receive access to documents at all times. 	<p>Vessel owner and captains.</p> <p>US Customs and Border Patrol.</p> <p>Hawaii Longline Association shall maintain list of vessels compliant with the Code based on annual vessel audits.</p>

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Criteria	Definitions	CODE Principle	CODE Responsibilities for Employers	CODE Guidance for Employers on Remedy Procedures and Tools	Oversight authority
<p><i>Health and Safety</i></p>	<p><i>Health and safety</i> onboard are a function of the equipment and training, hygiene onboard, first aid and medical attention, and the availability of food and water.</p>	<p>9. The workplace must be safe and hygienic, provide food and water, and ship to shore communication for emergencies.</p>	<p>9. Employers shall maintain a safe workplace, with hygienic facilities, adequate food and water, and ship to shore communications for emergencies.</p>	<p>1. Provide labor agencies with Code requirements regarding <i>Health & Safety</i>. 2. Obtain the agency’s Letter of Agreement to comply with the Code requirements. 3. Labor agencies must supply crewmen who have had medical exams, and certificates that confirm negative tests for TB and vaccination for tetanus. 4. Labor agencies shall provide medical examination certificate to workers and employers. 5. Provide crew with Crew Handbook (an orientation document in their language explaining the Code requirements regarding <i>Health & Safety</i>.) 6. Crew Handbooks shall introduce the US Coast Guard and address health and safety onboard. 7. Crew shall have access the onboard first aid kit as needed without needing permission. 8. All vessel captains shall have valid certificate of First Aid Training. 9. Vessel owner and captains shall follow USCG rules for vessel safety. 10. Health and safety must be clearly represented to crew as the vessel owner’s responsibility, and without taking any deductions.</p>	<p>Vessel owner and captains. Labor agencies. US Coast Guard annual inspections. CBP inspections and musters. Federal Fishery Observer placement inspection. Hawaii Longline Association shall maintain list of vessels compliant with the Code based on annual vessel audits.</p>

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Criteria	Definitions	CODE Principle	CODE Responsibilities for Employers	CODE Guidance for Employers on Remedy Procedures and Tools	Oversight authority
<p><i>Repatriation and Freedom of Movement</i></p>	<p><i>Repatriation</i> is about foreign crew going home, and the timing and costs to return home.</p> <p><i>Freedom of movement</i> means that workers shall have unrestricted access to basic necessities such as clean drinking water and sanitary facilities at all times. Workers movement shall not be unreasonably restricted.</p>	<p>10. Workers do not bear costs of repatriation at the end of their contracts.</p> <p>11. Workers’ movement in the workplace is not unreasonably restricted.</p>	<p>10. Employers shall bear the costs of repatriation of workers at the end of their contracts.</p> <p>11. Employers shall not unreasonably restrict workers’ movements at the workplace.</p>	<ol style="list-style-type: none"> 1. Provide labor agencies with Code requirements regarding <i>Repatriation</i>. 2. Obtain the agency’s Letter of Agreement to comply with the Code requirements. 3. Provide worker with Crew Handbook (an orientation document in their language explaining the Code requirements regarding <i>Repatriation and Freedom of Movement</i>.) 4. Crew Handbook shall inform workers how to contact CBP at any time. 5. Ending a contract short by a worker due to medical issue, medical and repatriation costs should be covered by owner. 6. When a worker chooses to end the contract, the worker shall pay the costs to repatriate although the owner could assist both with the cost and with ensuring crew are reimbursed by or not charged additional fees by the labor agency. 7. When a worker’s contract is terminated by an employer, the employer pays repatriation costs. 8. Employment contracts shall specify the circumstances in which a worker can terminate his contract without penalty, given reasonable notice, and in accordance with applicable law. 9. When returning home on completion of the contract the travel cost is covered by the employer. 10. Crew shall not be charged fees for replacing themselves, such as transfer costs for new crew. 11. Crew shall not be threatened with denunciation to CBP to coerce them into staying onboard. 12. Crew’s freedom of movement on and off the vessel shall be in compliance with CBP regulations and policy. 	<p>Vessel owner and captains.</p> <p>Labor agencies.</p> <p>CBP inspections and musters.</p> <p>CBP will escort crewmen from the vessel to the airport for repatriation.</p> <p>Hawaii Longline Association shall maintain list of vessels compliant with the Code based on annual audits.</p>

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Criteria	Definitions	CODE Principle	CODE Responsibilities for Employers	CODE Guidance for Employers on Remedy Procedures and Tools	Oversight authority
<p><i>Grievance mechanisms</i></p>	<p><i>Grievance mechanisms</i> are how workers may exercise their rights and who to talk to for help if a breach occurs.</p>	<p>12. Workers have means to share grievances without suffering prejudice or retaliation of any kind.</p>	<p>12. Employers shall address and resolve workers’ grievances in the workplace without prejudice or retaliation of any kind.</p>	<ol style="list-style-type: none"> 1. Provide labor agencies with Code requirements regarding <i>Grievance mechanisms</i>. 2. Obtain the agency’s Letter of Agreement to comply with the Code requirements. 3. Provide crew with Crew Handbook (an orientation document in their language explaining the Code requirements regarding <i>Grievance mechanisms</i>.) 4. Crew Handbook shall inform workers who to contact (ex. hotline services in their languages) to access agencies, consulates, social services organizations, local community organizations, and individuals when they have grievances. 5. Employers shall provide crew with opportunities to communicate with authorities, including CBP and their Consul representatives. 6. Employers shall provide for unmonitored calls from ship to shore on request. 	<p>Vessel owner and captains.</p> <p>Labor agencies.</p> <p>CBP maintains “hotline” for crewmen to report grievances.</p> <p>Embassies, Consulates, local Community organizations, SeaFarer’s Ministry are also contacts for crewmen.</p> <p>Hawaii Longline Association shall maintain list of vessels compliant with the Code based on annual vessel audits.</p>