## Norway. Fellesforbundet Seafood and aquaculture workers: Request for responses to questions on a UN report

- What do you see as the main threats to fishing workers today?

One of the biggest challenges for our members is that the Working Environment Act is not always complied with. Safety equipment is lacking, the working day is too long and rest periods are not observed. Fellesforbundet therefore believes that there is a need for better cooperation between the trade unions and the companies. We believe that better cooperation in the enterprises can lead to better arrangements for safety and working hours and various on-call/standby arrangements, which will have an impact on workers' health. Fellesforbundet finds that many companies make decisions without properly involving employees. We believe that better cooperation can have many positive consequences, both for the companies, the employees and the fish.

- What does your fish supply chain look like today? Which companies dominate the industry in your country?

The entire fish farming value chain is represented in Norway. We have companies that work with broodstock, smolt, the sea phase and fish slaughterhouses. Some companies only work in one part of the value chain, such as developing smolt, while other companies own the entire value chain. In addition, there is the supplier industry, which builds fish slaughterhouses and boats and repairs all the equipment. The largest fish farming companies are Mowi, Salmar and Lerøy. Cermaq, Grieg Seafood and Nova Sea are also large.

- In your opinion, what are the main concerns regarding labour conditions in the fish supply chain? Which parts of the supply chain do you consider to be the most dangerous or problematic?

SINTEF has just completed a Health Safety and Environment (HSE) survey in the aquaculture industry in Norway. There has been an average of one death per year in the industry over the past 10 years. This makes the aquaculture industry one of Norway's most dangerous occupations. The most serious accidents occur during the sea phase. [reference: hms-undersokelsen-i-havbruk-2023.pdf (sintef.no)](https://www.sintef.no/contentassets/c3d21b265d7f4b69bae91f7f74afb6d1/hms-undersokelsen-i-havbruk-2023.pdf)

The causes of accidents are complex. Working at sea is exposed to wind and weather, which means that accidents can easily happen. Being exposed to risk on a daily basis and realising that things usually go well can contribute to employees taking unnecessary risks themselves. At the same time, we see that long working days, heavy lifting and little rest affect the risk of accidents occurring. In addition, a lot of new technology is being introduced. This is utilised without the necessary training and routines being in place.

- What is your opinion on aquaculture? Can it be a good sector for both the environment and people?

In Norway, we have challenges related to the environment and fish health. We see that the facilities are located too close to each other and that diseases spread between sites. A traffic light system has been introduced to regulate growth in the industry. For the sake of nature, not all companies can produce the amount they want. There have been discussions about indicators for the state of the environment. The indicator that is used, and which there is agreement that it works, is based on the number of female lice on wild fish. If the spread of lice to wild fish is too great, efforts will be made to reduce production in the area.

A committee (NOU2023: 23) has recently reviewed the entire regulation of the aquaculture industry. In this context, they have also looked at the environmental situation. They recommend several measures to make it more attractive for fish farmers to invest in zero- or low-emission technology, such as closed facilities, in order to limit the harmful environmental impact.

- What national laws that exist in your country or international standards need to be implemented to better serve and protect fishing workers?

Fellesforbundet does not see a need to implement more laws, but works to ensure that the work takes place within the existing laws.

- Have you had sufficient opportunity to participate in relevant national and international consultations? If not, which ones have you been excluded from?

We have the opportunity to participate wherever we want.