



# Canned Tuna Brands - Questions on Human Rights in Pacific Tuna Fishing Operations and Supply Chains (2020/21)

\* The term 'modern slavery' used in this survey is taken to include forced labour, slavery, human trafficking, servitude, bonded and child labour.

**Company:** ALDI Nord

**Canned Tuna Brands:** Tesoros del Sur, Almare Seafood

## Human Rights Policy

1.

- a. Since January 2019, has your company introduced any **new** human rights policies to address the risk of **modern slavery**\* in its operations or supply chains? Yes / No  
If yes, please provide full details and a link.

We are in the process of developing a forced labour policy, which we want to publish at the beginning of 2021 as well as a supplier guidance paper for forced labour together with ALDI SÜD.

[ALDI Nord Group – Human Rights Policy Statement](#)

- b. Since January 2019, has your company **revised or updated** any of its existing human rights policies to address the risk of modern slavery in its operations or supply chains?

Yes, we are updating our Human Rights Policy on a regular basis in close dialogue with NGOs. In the latest update we mentioned our Bangladesh Unit, which is together with our Hong Kong Unit responsible for the coordination and review of human rights aspects in Asia.

2. Since January 2019, if your company has made a **new** commitment address **modern slavery** does it apply throughout your supply chains?

Checks to detect modern slavery throughout our supply chains and therefore our canned tuna supply chain of high-risk countries are made through our Social Compliance Programme. If the supplier's site is located in a 'high-risk' country as defined by amfori BSCI (Business Social Compliance Initiative), the supplier has to provide independent third-party audits of the production facilities to demonstrate compliance with our ethical requirements as defined in the Social Compliance Programme (e.g. amfori BSCI audit, SA8000 (Social Accountability International Standard), SMETA (Sedex Members Ethical Trade Audit)).

Moreover, ALDI is conducting its own Audits. During this ALDI Social Audits (ASAs) the auditors interview migrant workers as highly vulnerable to modern slavery, with specific questions to identify cases of forced labour. The ALDI Nord Group of Companies (hereinafter ALDI Nord) believes that companies should be committed to respecting human rights and preventing human rights violations. Our commitment therefore encompasses our own business operations and business relationships, as well as impacts indirectly caused by our actions.

We respect all internationally recognised human rights. There are certain human rights aspects that are of increased relevance to us as a food retailer and vendor of non-food as our actions could have a stronger impact on these. These relate to topics such as discrimination, health and safety, freedom of association, remuneration, working hours, child labour and forced labour. We review our human rights impact, in particular our areas of focus, in cooperation with external experts.

In 2020 ALDI Nord became member of Mekong Club, an association to end modern slavery. As experts they support us e.g. by revising our internal guidance paper and our Forced Labour Policy.

3. Since January 2019, has your company adopted or revised a **responsible sourcing or supplier code of conduct** that prohibits modern slavery?

The amfori BSCI Code of Conduct, which states that businesses shall not engage in any form of servitude, forced, bonded, indentured, trafficked or non-voluntary labour, is part of all buying agreements with all our importers. In addition, we have published several purchasing policies (including fish).

You can access the fish purchasing policy via the following link:

[ALDI Nord Group – Fish Purchasing Policy](#)

## Human Rights Due Diligence Process

### 4. [Has your company mapped its tuna supply chains, in whole or part? Yes / No](#)

As a member of the Global Dialogue on Seafood Traceability (GDST) we are now adapting the GDST in our data requests from our suppliers. Besides the standard data (common name of the raw product; species, production method, catch area, fishing gear type, country of origin) we are also requesting data related to dates of landing, landing location, vessel name, vessel flag, name of the fishery and the vessel trip dates. We will work closely with our suppliers and the GDST to expand this list further.

In addition, we are conducting a human rights risk assessment in the area of fish and seafood. Due to Covid-19 pandemic it will be delayed, but we aim to publish the results at latest by the end of 2021

In order to make this information easily accessible to our customers, we introduced the ALDI Transparency Code (ATC) for fish in 2017. The ATC is our own product traceability system to enable our customers to trace the origin of various products like meat, eggs, fish and textiles. Upon scanning a QR-Code on the product packaging, the user will receive online information on the product supply chain and more detailed information on the specific fishing method.

### 5. [Does the company source tuna from the Pacific region? Yes / No](#) [If yes, provide location \(by country\).](#)

Yes. FAO71; FAO81; FAO87; FAO77

6. Since January 2019, has your company adopted, or revised, a human rights due diligence policy, process or procedure to identify, assess and manage human rights risks (actual or potential), including modern slavery, in its operations (and those of its subsidiaries) and supply chains? Yes / No

We are still committed to the UN Guiding Principles on Business Human Rights (UNGPs) and consider the a thorough human rights due diligence process an integral part of our human rights approach.

If yes, please provide details and describe the human rights due diligence process. **Key steps include:** (i) identifying and assessing human rights impacts; (ii) integrating and acting on assessment findings; (iii) tracking the effectiveness of the company's response; and (iv) communicating externally about how the company is addressing its human rights impacts.

We continuously assess the impact of our actions on human rights. In particular, we set priorities and evaluate risks based on the severity of potential human right impacts. In this context, we are aware that specific groups, such as minorities and women, are potentially more vulnerable to violations of their fundamental human rights. We will continue to increase our dialogue with local stakeholders and potentially affected parties, the human rights of whom may particularly be at risk of being violated.

We strive to prevent and mitigate the impact of any risks we identify and prioritise by implementing corresponding measures. This involves, among other things, aligning our management and buying practices with this goal, raising awareness and training of relevant employees, our business partners, and suppliers. Wherever our potential influence is low, we participate in industry-wide and multi-stakeholder initiatives. [ALDI Nord- Human Rights Policy Statement](#)

All suppliers need to provide details of the canned tuna production facility as part of our contract requirements. If the supplier's site is located in a 'high-risk' country as defined by amfori BSCI (Business Social Compliance Initiative), the supplier has to provide independent third-party audits of the production facilities to demonstrate compliance with our ethical requirements as defined in the Social Compliance Programme (e.g.

amfori BSCI audit, SA8000 (Social Accountability International Standard), SMETA (Sedex Members Ethical Trade Audit)).

### **Description of risk assessment and planned next steps**

ALDI Nord worked together with a third-party consultancy to identify high risk and high priority commodities. Based on the risk assessment in combination with our annual spend, 8 product groups were categorized as high-risk including fish and seafood.

Drawing on our risk assessment we will further develop the existing due diligence process as a next step. As mentioned above, the first human rights impact assessment that we conduct is about the fish and seafood supply chain. This will help us to learn more about potential risk in the tuna supply chain and assists us by taking measures to mitigate human rights violations. The human rights impact assessment is also the first step to start implementing a grievance mechanism into our fish and seafood supply chain. In accordance with the UNGP, we have established a continuous improvement process that covers all the main steps mentioned.

7. Since January 2019, has your company taken **practical action** to ensure that modern slavery does not occur in your company's (or its subsidiaries') operations and supply chains for tuna procurement from the Pacific? If yes, please describe.

**Examples** might include:

- i) *training* staff and management, workers, suppliers or business partners about rights, risks, responsibilities and remediation;
- ii) *engaging* with NGOs, fishers/ their representatives (including unions) and policy-makers;
- iii) cascading *contractual* clauses in supply agreements;
- iv) digital *traceability* of fish (across entire supply chain, or part only);
- v) prohibition on *recruitment fees*;
- vi) protective measures to protect against exploitation of *migrant* fishers;
- vii) prohibition on sourcing from suppliers that *transship* at sea, or use *flags of convenience*;
- viii) ensuring *freedom of association* and collective bargaining by fishers/ their representatives (including unions);
- ix) oversight of *recruitment* or labour hire entities; and

x) independent supply chain *auditing*.

Please provide details.

We endeavour to raise the awareness of our suppliers regarding the exclusion of merchandise from illegal, unregulated, and undocumented (IUU) fisheries. [ALDI North Group – Fish Purchasing Policy](#)

As part of this policy, we have included the requirement that for invitations to tender from 1st July 2017, the commissioned production facilities for the industrial manufacturing of canned food (including canned fish) in BSCI risk countries are subject to an additional social auditing (BSCI/SA8000). Moreover, we intend to expand our controlling procedures in a risk-oriented way.

If the product is not MSC-certified, we and our suppliers jointly strive to achieve compliance with at least one of the following criteria:

- The supplier or processing company, respectively, is a member of ISSF (International Seafood Sustainability Foundation);
- The vessel is registered with the ProActiveVessel Register (PVR);
- The fishery verifiably supports a Fishery Improvement Project (FIP) that is registered on [fisheryimprovementprojects.org](http://fisheryimprovementprojects.org) and thus meets the requirements of the Sustainable Fisheries Partnership (SFP).

ALDI Nord undertakes regular reviews of its targets in the area of sustainable fish and seafood purchasing and may, where required, formulate additional targets and measures. In doing so, we are in a constant dialogue with external partners such as NGOs, members of the academic professions and other relevant stakeholders.

We are close to the roll out of our new International Catalogue of Requirements (ICOR) which defines the CR requirements on international level for fish and seafood. The ICOR will help us to communicate specific CR targets to our suppliers and will be revised every half year.

At ALDI Nord we understand that data is a key component to ensure that modern slavery does not occur in our supply chains. Therefore, the adoption of the GDST standards will help us to improve our own data and the data in the entire fish supply chain. With accurate data we can identify modern slavery in our supply chains, finding solution and follow up on the improvements.

We also understand that the social policies of standard-setting organizations need continuous improvement. We therefore work closely with different standard-setting organizations to improve their social policies and – as key element – their impact measurement. As examples we revised the policies of the Global Sustainable Seafood Initiative (GSSI) and [fisheryprogress.org](https://fisheryprogress.org).

In order to use our weight in the market we are also supporting advocacy letters from other organisations. In August 2020 we supported a letter from the Sustainable Fishery Partnership to receive funding for the GoTFish project in order to improve fisheries management in the gulf of Thailand. As Thailand is an important sourcing country for ALDI Nord, we also supported the letter of the International Labour Rights Forum to the European Union. The letter aimed at ensuring that the EU insists, that Thailand is committing to a set of robust human rights conditions in order to restart negotiations.

Together with ALDI SÜD we are working on a supplier evaluation tool to measure the CR performance of our tuna suppliers. As a second step we aim to work closely with our suppliers to improve their CR performance and further discuss topics concerning modern slavery. Their performance in human rights and sustainability aspects will be integrated into buying decisions.

In the above-mentioned Forced Labour Policy which is under development and which represent requirements for our suppliers, we already included the aspects (v), (vi), (viii), (ix). In the guidance paper for suppliers, also mentioned before, these aspects are also covered.

8. If the company has taken steps to identify and address human rights risks, how does it (a) **prioritise** which risks to address first; and (b) assess and track the **effectiveness** of its actions and response?

We prioritise our topics based on the materiality matrix, which is evaluated and updated every two years (including international stakeholders, e.g. NGOs, customers, politics, science, etc.).

In addition, regular risk assessments take into account risks based on international classifications (social and environmental aspects included), buying volumes and severity of incidents. As mentioned above we are in the process of conducting a human rights impact assessment (HRIA) in our fish and seafood supply chain. The results of the HRIA will impact our current measures and further developments of indicators and measures to source sustainably.

## Grievance Mechanism

9. Since January 2019, per the [UN Guiding Principles on Business and Human Rights](#), has your company adopted, or made changes to improve, a **grievance/ complaints mechanism** through which workers, including fishers in your supply chains, can raise concerns about human rights? Yes / No

If so, can they access this in their own language and in a way that allows grievances, or concerns, to be reported safely, in confidence and without intimidation? Have any human rights concerns connected with the Pacific tuna sector been reported via your company's complaints mechanism? Please provide details.

Grievance mechanisms provide a suitable means of identifying adverse effects at an early stage. For this reason, we have created grievance mechanism processes for our own employees and business partners. However, as the last actor along multi-level, complex supply chains, we have identified particular challenges regarding individual implementation in countries where the products we offer are manufactured. As part of our strategy, grievance mechanisms will be implemented into all high risk supply chains.

[ALDI North Group – Human Rights Policy Statement](#)

10. Since January 2019, have you introduced a corrective or **remediation plan** if instances of modern slavery are identified in your operations, or supply chains? Can you describe it?



As every human rights violation (including modern slavery) is unique, we assess every case that is brought to our attention individually and develop a corresponding remediation plan. On an individual basis, multiple internal and external stakeholders, such as business partners, standard organizations and our CR office in Hong Kong, are involved to investigate and initiate remediation measures.

For our non- food supply chains, we already implemented defined processes of remediation.

11. How many **instances** of modern slavery has your company **identified** over the last 3 years (from and including 2018) in its own operations (including subsidiaries) or in its supply chains that relate to tuna procurement from the Pacific?

Please describe by reference to:

- (a) Number of instances (broken down for each calendar year)
- (b) Do you know where they occurred? Please describe event(s).
- (c) How did the company respond to address the issue(s)?

We have not been made aware of any instances of modern slavery in our tuna supply chain in 2019/2020.

We are aware that the lack of transparency in this supply chain also plays a role here. That is why we are working on creating transparency, for example via HRIA, as described above.

## Reporting

12. Does your company communicate, or **report**, externally on steps taken to address modern slavery? Yes / No

We publish a Sustainability Report on a regular basis on the GRI Standard, including information on supply chain tasks and explaining what effort we have already made in the context of transparency and social compliance. The reporting concept is continuously revised and new indicators are reviewed. We plan to report on human rights in accordance with the UNGP in the future.

If yes, please provide relevant details, in period since January 2019. This could include statements issued under the [UK](#) or [Australian](#) Modern Slavery Acts.

#### [ALDI North Group – Sustainability Report 2019](#)

### Other information

13. Since January 2019, has your company encountered **obstacles or challenges** in implementing its human rights commitments, taking practical action against modern slavery in tuna supply chains and/or in relation to any of the areas mentioned above? Yes / No

If yes, please explain and provide details of any strategies to overcome them.

As mentioned before, we see the lack of accurate data and transparency as the key challenge in our tuna supply chain. It is difficult for a retailer to overview every aspect in the tuna supply chain and in particular human rights violations on fishing vessels. The GDST is therefore one of our core partners to improve the data we gather throughout the supply chain. Another aspect we are working on at ALDI Nord is to further improve our internal data systems. We are in the process of implementing new software our suppliers can use to provide us with the necessary information we need to track human rights violations and take active measures to counter them.

We will of course continue our dialogue with stakeholders and potentially affected rightsholders in the context of the above mentioned HRIA.

14. Since January 2019, has your company joined or been active in any regional, or sectoral, **multi-stakeholder initiatives** that address modern slavery in fishing?

If yes, please provide details.

We are part of the following multi-stakeholder initiatives that address modern slavery in the supply chain including fishery:

- Amfori BSCI (international)

15. Please provide any **other information** about your company's policies and practices on human rights that may be relevant.

We strongly believe that the implementation of human rights is a continuous process. We are therefore committed to review and further develop our Human Rights Statement and instruments on a regular basis.

## **COVID-19 impacts**

16. Has the **COVID-19** pandemic affected your ability to identify, assess or respond to modern slavery risks in your tuna supply chains?

Please explain and provide details, including any actions (a) taken or (b) delayed/suspended, by you.

As an immediate reaction to the COVID 19 outbreak the ALDI Nord Group send recommendations for responsible purchasing practices to the buying teams. Within this letter it was pointed out that the buying teams should avoid cancellations of existing orders to avoid negative impacts along the supply chain and so far, we have not cancelled a single order and we are aiming not to do so.

Another aspect was to offer supportive measures and in single cases raise the supplier's awareness of taking protective measures in the supply chains. The document moreover underlines the importance of social standards and workers rights be considered in our buying practices and represented by applied documents such as the amfori BSCI code of conduct, CR Policy and Human Rights Statement.

With emphasis, we made our buying teams again aware of the following documents:

[Löning – Human Rights & Responsible Business](#)

[International Chamber of Commerce](#)

[Ethical Trading Initiative](#)

Our Hong Kong office also send regular updates on the COVID- 19 situation in Asia to the whole ALDI Nord Group. These updates enable us to respond to new developments immediately.