



# 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:** Bumble Bee Foods / Clover Leaf

**Canned Tuna Brands:** Bumble Bee, Clover Leaf, Wild Selections, Brunswick

## 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.

Yes

Updated Supplier code of conduct [https://thebumblebeecompany.com/wp-content/uploads/2020/07/Supplier\\_Code\\_of\\_Conduct\\_2020.pdf](https://thebumblebeecompany.com/wp-content/uploads/2020/07/Supplier_Code_of_Conduct_2020.pdf)

- 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, updated supplier code of conduct

[https://thebumblebeecompany.com/wp-content/uploads/2020/07/Supplier\\_Code\\_of\\_Conduct\\_2020.pdf](https://thebumblebeecompany.com/wp-content/uploads/2020/07/Supplier_Code_of_Conduct_2020.pdf)

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

Public commitment by 2025 to have all tuna fleets from which we source covered by an audit program with third party oversight.

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

Yes

[https://thebumblebeecompany.com/wp-content/uploads/2020/07/Supplier\\_Code\\_of\\_Conduct\\_2020.pdf](https://thebumblebeecompany.com/wp-content/uploads/2020/07/Supplier_Code_of_Conduct_2020.pdf)

## Human Rights Due Diligence Process

4. Has your company **mapped** its tuna supply chains, in whole or part? Yes / No

Yes, we have full traceability from can code through final and any intermediate production facilities back to vessel trips that harvested fish for that product. We provide a consumer facing trace site as well <http://www.bumblebee.com/tracemycatch/> : <https://www.cloverleaf.ca/en/sustainability/trace-my-catch>

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

Yes.

Source from vessels flagged to Taiwan, China, USA, Fiji, Vanuatu and number of island countries part of the Parties to the Nauru Agreement (PNA) and FFA. Source from land based processors in Fiji, Solomon Islands, Philippines, Indonesia, Thailand, and Vietnam.

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

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.

The first step entails having detailed knowledge and traceability of tuna supply chain. We have this knowledge and utilize an in-house traceability database and process where we screen all tuna entering our supply chain for legality of harvest and compliance with other commitments associated with International Seafood Sustainability Foundation (ISSF). As noted above we can trace from can code back through the supply chain to the harvest events. We have also engaged directly with our suppliers to map sources of workers and fishermen by country and identify highest potential risks. We require our direct tuna suppliers to undergo third party social audits such as SMETA on a periodic basis which audit facilities in a number of social areas. In 2017 we joined the Seafood Task Force to help develop a credible and realistic code and audit protocol for tuna vessels. The final auditable standard was approved and is being rolled out on wider scale to fleets vessels within the supply chain. In 2020, our long time tuna supplier FCF purchased Bumble Bee Seafood Company. They are also Seafood Task Force participants and we have established a vessel and fleet office audit program which includes on site audits and crew interviews.

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; via our supplier code of conduct bolstered by third party social audits

- ii) *engaging with NGOs, fishers/ their representatives (including unions) and policy-makers*; Yes engage NGOs involved in the Seafood Task Force
- iii) *cascading contractual clauses in supply agreements*; Acknowledgement of code of conduct from suppliers as part of requirement to do business with us. Additionally, our main tuna raw material suppliers are Seafood Task Force members with shared commitments.
- iv) *digital traceability of fish (across entire supply chain, or part only)*; continued trace process and database along with consumer facing website
- v) *prohibition on recruitment fees*; Implementing through the supply chain working through Seafood Task Force on definitions of “recruitment fees” what are allowable and timeline to fully implement
- vi) *protective measures to protect against exploitation of migrant fishers*; We believe collection of measures and policies discussed here work protect migrant fishers.
- vii) *prohibition on sourcing from suppliers that transship at sea, or use flags of convenience*; All purse seine caught fish is transhipped in port. We do allow transshipment at sea of longline caught albacore only when observed by an independent observer on the carrier and approved by RFMO and vessel flag states – we obtain transshipment declarations for all events.
- viii) *ensuring freedom of association and collective bargaining by fishers/ their representatives (including unions)*; Yes part of code
- ix) *oversight of recruitment or labour hire entities*; and See notes on challenges in #13 below
- x) *independent supply chain auditing*. We require our direct tuna suppliers to undergo third party social audits such as SMETA on a periodic basis which audit facilities in a number of social areas. Are also auditing vessels/fleet offices with a third party oversight.

Please provide details.

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 prioritize through a combination of highest risks and those which are most directly addressable. We take direct action and work with our direct suppliers where practical, and also work with key suppliers and look for pre-competitive partnerships to most effectively address risks further back in the supply chain where our direct influence is lower. We can assess effectiveness by looking at third party audit results over time but assessing effectiveness further back in the supply chain to vessels and foreign worker recruitment will require additional time and is an ongoing process.

## 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.

We do not own or directly operate any facilities outside of North America. For our owned facilities we do have established grievance mechanisms for workers. We utilize an anonymous system called Ethics Point that allows our employees or our suppliers to report any code of conduct concern which is in turn investigated. Additionally, our tuna suppliers in the Pacific region have their own worker voice mechanisms ranging from anonymous drop boxes, to formalized worker committees and in some case unions. For fishermen working at sea for extended periods, we are working collaboratively as part of such organizations as the Seafood Task Force to develop mechanisms to enable safe and anonymous reporting, we still have work to do on this front.

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?

We are committed to investigating all credible claims of modern slavery or violations of our supplier code of conduct and ensuring corrective actions are taken. In cases where

corrections cannot be made to our satisfaction, relationships with suppliers can be terminated.

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?

We learned from several public reports issued by a third party of several incidents occurring on vessels from which we had procured fish. We attempted to gather more information about this incident through our supply chain, but experienced challenges due to fact that incidents occurred in the past and were not able to locate specific individuals. We have taken action to increase audits if risk is deemed higher.

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)?

## Reporting

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

Yes.

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

Communication is done via website links referenced below. There is no formal external reporting beyond that.

<https://thebumblebeecompany.com/impact/>

## 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.

A broad challenge, not unique to the seafood industry, is implementing and monitoring recruitment policies and practices among agents and organizations involved in the recruitment of foreign workers, particularly for fishing vessels. It is common to see multiple layers of agents and sub-agents in the sending country which are involved in the process of recruiting a worker that are difficult to directly engage with on policy. We feel the best way to address this is collectively as an industry in pre-competitive partnerships such as the Seafood Task Force where we can align interests and recruiting policies across the larger supply chain to attain more effective results. We are active and directly involved in the “Responsible Recruitment” working group within the task force whose objective is to address specific challenges associated with the recruiting process.

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.

Seafood Task Force (current board member and co-head of Tuna working group) and Tuna 2020 declaration.

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

## 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.

Yes to some extent. While we have still continued modified and opportunistic audits of fleet offices and vessels, travel restrictions within the region have hindered progress as auditors have not been able to travel and in some cases there are restrictions on face to face interactions.