



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.

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.
 - 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?

If yes, please provide full details explaining the revisions or updates and a link.

2. Since January 2019, if your company has made a **new** commitment address **modern slavery** does it apply throughout your supply chains?
3. Since January 2019, has your company adopted or revised a responsible sourcing or **supplier code of conduct** that prohibits modern slavery?

Human Rights Due Diligence Process

4. Has your company **mapped** its tuna supply chains, in whole or part? Yes / No
5. Does the company source tuna from the **Pacific** region? Yes / No
If yes, provide location (by country).

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.

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.

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?

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.

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?
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)?

Reporting

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

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

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.

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.

Examples might include:

- i) Seafood Task Force;
- ii) Bali Process Government and Business Forum;
- iii) Tuna 2020 Traceability Declaration; and
- iv) other?

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.

Examples of actions taken might include:

- i) Public *commitment* to respect human rights during pandemic;
- ii) Engaging with suppliers to ensure fishers temporarily prevented from working receive *financial support*;

- iii) Engaging with suppliers to ensure supply chains not tainted by modern slavery as result of *extended periods* at sea for fishers because of COVID-19;
- iv) Systems to track actions taken by your company and assess their effectiveness in avoiding *heightened exposure* to modern slavery for fishers because of COVID-19;
- v) Maintaining tuna *order levels*; and
- vi) Supporting *safe return* of migrant fishers to countries of domicile.

Examples of actions delayed/ suspended might include:

- i) Face-to-face staff *training* on modern slavery risks;
- ii) Engaging with suppliers, workers, or other external stakeholders as part of your company's *due diligence* program; and
- iii) Social *auditing* program halts.

Thank you.

For reference:

- [UN Guiding Principles on Business and Human Rights](#)
- [OECD Guidelines for Multinational Enterprises](#)
- [Australian Modern Slavery Act \(2018\)](#)
- [UK Modern Slavery Act \(2015\)](#)
- [Californian Transparency in Supply Chains Act](#)
- [ILO Forced Labour Convention, 1930 \(No. 29\)](#)
- [ILO Declaration on Fundamental Principles and Rights at Work](#)
- [ILO Work in Fishing Convention, 2007 \(No. 188\)](#)
- [Seafood Task Force](#)
- [Bali Process Government and Business Forum](#)
- [Tuna 2020 Traceability Declaration](#)
- [Mapping of Sustainable Development Goals to human rights instruments and issues](#)