



Canned Tuna Brands - New Companies - 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: Tesco Stores UK & ROI

Canned Tuna Brands: Tesco Own Label

Human Rights Policy

1. Has your company made a public commitment to respect to **human rights**? Yes / No
If yes, please provide full details and a link.

Yes, it is publicly available here:

<https://www.tescopl.com/sustainability/people/human-rights/>

2. If yes, does your company's commitment address **modern slavery** and does it apply throughout your supply chains? Please provide details.

Tesco publicly available Modern Slavery Statement is available here:

https://www.tescopl.com/media/755909/tesco-modern-slavery-statement_final-201920.pdf

3. Has your company adopted a responsible sourcing or **supplier code of conduct** that prohibits modern slavery? Yes / No

If yes, please provide details.

Yes.

Tesco Human Rights requirements for food and grocery non-food suppliers (in which canned tuna falls) is publicly available to download as a pdf here:

<https://www.tescopl.com/sustainability/publications/policies/downloads/>

Tesco Responsible Recruitment requirements for Thailand & Malaysia is publicly available here:

<https://www.tescopl.com/sustainability/publications/policies/downloads/>

Human Rights Due Diligence Process

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

Yes, in whole and is publicly available here:

<https://oceandisclosureproject.org/companies/tesco>

5. Does the company source tuna from the **Pacific** region? Yes / No

Yes.

If yes, provide location (by country).

Indonesia Pole and Line and Ecuador Purse Seine for Pacific O/L canned tuna to our own label supply (2019 full year data). All our sources are publicly available through the Ocean Disclosure Project: <https://oceandisclosureproject.org/companies/tesco>

6. Does your company have 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

Yes.

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.

Tesco Human Rights due diligence process is publicly available here:

<https://www.tescopl.com/sustainability/publications/policies/downloads/our-approach-to-human-rights/>

7. 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.

Yes

All Tesco commercial colleagues attend mandatory Responsible Sourcing training which specifically includes modern slavery highlighting risks, responsibilities and remediation end to end across the supply chain.

Tesco funds a place on Stronger Together training aimed at reducing modern slavery for all suppliers.

Proactive and continual engagement with relevant NGO's, other retailers and associated industry bodies to understand the risks of modern slavery in our supply chains.

Collaborating with the wider industry to undertake a supply chain mapping exercise in partnership with the Seafood Ethics Action Alliance to identify supply chains of high risk from Human Rights Perspective.

Tesco's Human Rights Requirements that all food suppliers must contractually comply with including commitment to the worker pays principle ensuring payment of recruitment fees does not take place in our supply chains.

8. If your 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?

Tesco Human Rights due diligence process is publicly available here:

<https://www.tescopl.com/sustainability/publications/policies/downloads/our-approach-to-human-rights/>

Grievance Mechanism

9. Per the [UN Guiding Principles on Business and Human Rights](#), does your company have a **grievance/ complaints mechanism** through which workers, including fishers in your supply chains, can raise concerns about human rights? Yes / No

Yes the Tesco protector line is available to all workers in Tesco supply chains.

Protector Line allows concerns to be raised regarding misconduct at work. It is a free service and completely confidential run by an independent company for Tesco. You don't have to give your name when you call although if you do, the Protector Line will be able to update you on the outcome of any investigation. As a business we support the UK Public Interest Disclosure Act 1998 (and its foreign law equivalents) which protects the confidentiality of complaints. This means that as long as you're acting in good faith and your concerns are genuine, you are legally protected from victimisation and will not be at risk of any form of retribution, including losing your job, as a consequence of raising a concern – even if you are mistaken.

We have recognised the challenges associated with grievance mechanisms in the fisheries sector and the value they would potentially provide to workers. We are engaged in a project led by Global Seafood Assurances to survey best practices on grievance mechanisms and worker voice in the global fishing sector and make recommendations on what retailers can do to ensure access to effective grievance mechanisms.

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.

No, not in relation to the canned supply chain.

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

Yes.

When we receive intelligence through ethical audits, our own site visits, Protector Line or other sources, such as NGOs or media reports, we immediately investigate. Where our suppliers identify possible indicators of modern slavery within their own operations, we support and monitor their investigations. Where a supplier is identified to have caused or contributed to a negative human rights impact, we expect them to actively engage in bringing about remediation, working alone or in cooperation with other actors. To ensure

possible grievances are addressed early and remediated appropriately, Tesco's expectation is that all suppliers establish or participate in effective operational-level grievance mechanisms – in line with the UN Guiding Principles.

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) 0
- (b) Do you know where they occurred? Please describe event(s). N/A
- (c) How did the company respond to address the issue(s)? N/A

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. This could include statements issued under the [UK](#) or [Australian](#) Modern Slavery Acts.

Tesco publicly available Modern Slavery Statement is available here:

https://www.tescopl.com/media/755909/tesco-modern-slavery-statement-_final-201920.pdf

Tesco publicly available 2019/20 little helps plan report is available to download as a pdf here (pages 40 & 41):

<https://www.tescopl.com/sustainability/publications/reports/>

Other information

13. 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.

The Tesco Responsible Sourcing team have identified Tuna to be an area of focus. Korean longline tuna vessels remain at sea for extended periods of up to a year meaning that traditional due diligence using audits and inspections is not possible and as a result little is known about treatment of crew and working conditions onboard the vessels.

For those reasons, Tesco and one of our key suppliers are undertaking some enhanced due diligence with the Korean longline tuna supply chain in order to get greater visibility of recruitment practices, labour standards and working conditions at sea. This involves collaboration with the Korean Ministry of Oceans and Fisheries, the Environmental Justice Foundation, Advocates for Public Interest Law in Korea, the Korea Overseas Fisheries Association and the Seafood Business for Ocean Stewardship.

14. Does your company actively participate in any regional, or sectoral, **multi-stakeholder initiatives** that address modern slavery in fishing?

Yes.

If yes, please provide details.

We were pivotal in the creation of the Seafood Task Force. We are active members of the Global Tuna Alliance, holding the Vicechair position in the Steering Committee. We are signatories of the Tuna 2020 Traceability Declaration and of EJF's Transparency Charter which includes measures that will help human rights at in this industry Furthermore, we chair the SEA Alliance industry group, looking for efficient ways to tackle human right issues in the fishing industry through supply chain efforts. We are also active members of the Consumer Goods Forum Human Rights Coalition and Force Labour Working groups, both of which have identified fish supply chains as a key priority.

Finally, we also take any opportunity to advocate for improvement in this area. Some of our latest examples are at the Conference for Sustainable International Fisheries Management and Korean Roundtable for Sustainable Tuna in Korea in November, North Atlantic Seafood Forum in March, and the World Economic Forum Virtual Ocean Dialogues 2020 in June.

Example – Giles Bolton, Tesco's Responsible Sourcing Director at the World Economic Forum Virtual Ocean Dialogues 2020 in June – Nourishing Billions:

<https://www.weforum.org/events/virtual-ocean-dialogues-2020/sessions/nourishing-billions> 59:57 – 01:02:10 – seafood and especially aquaculture best bet of affordable sustainable protein for a global growing population. Human Rights at sea. 3 asks:

- Robust UN High Seas Treaty
- Stronger regional management and better collaboration
- Transparency, EJP Transparency charter.

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

Tesco approach on Tuna sourcing is publicly available here:

<https://www.tescopl.com/blog/tuna-fish-sourcing-tesco/>

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? Yes / No

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

Tesco is committed to ensuring that all seafarers in our supply chains are respected in the work they are doing, receiving fair treatment whilst at sea and working in a safe environment.

As a member of the Consumer Goods Forum we are pleased to support a letter addressed to the UN Secretary General to encourage governments to take immediate action in recognising seafarers as 'key workers' during the Covid-19 pandemic.

https://www.theconsumergoodsforum.com/press_releases/the-consumer-goods-forum-board-issue-letter-to-un-secretary-general-to-encourage-governments-to-unblock-sea-transportation-routes-and-protect-seafarers-wellbeing/