



Canned Tuna Brands - Questions on Human Rights in Pacific Tuna Fishing Operations and Supply Chains (2018/19)

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

Company: Clover Leaf Seafoods

Human Rights Policy

1. Has your company made a public commitment to respect **human rights**? If so, please provide a link.

<https://www.cloverleaf.ca/en/social-responsibility>

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

Please see attached supplier code of conduct in link below which we require suppliers acknowledge in writing as part of annual continuing guarantee.

<https://www.cloverleaf.ca/en/supplier-code-conduct>

3. Does the company have a responsible sourcing or **supplier code of conduct** that prohibits modern slavery? Please provide details.

Please see #2 above.

Human Rights Due Diligence Process

4. Has your company **mapped** its tuna supply chains, in whole or part?

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

<https://www.cloverleaf.ca/en/sustainability/trace-my-catch>

5. Does the company source tuna from the **Pacific** region?

Yes

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, we have a process to identify potential risks.

If so, 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* 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 believe 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 recently approved and the process of rolling this out on wider scale to vessels within the supply chain begins this year.

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

Please see above response in #6 as well as notes below.

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, additionally a number of our suppliers are members of the Seafood Task Force
- 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
- iv) *digital traceability of fish (across entire supply chain, or part only);* Yes, see reference above to 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;
- 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;* See notes on challenges in #13 below
- x) *independent supply chain auditing.* Yes, see above reference to audit of supplier facilities, will be expanding audit process to vessels as well.

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 more time.

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? 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 the 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. 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?

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** in 2018 in its own operations (including subsidiaries) or in its supply chains that relate to tuna procurement from the Pacific? Do you know where they occurred and can you describe them? How did the company respond to address the issue(s)?

We learned from a 2018 report issued by a third party, that in 2016, an incident occurred on a vessel from which we had procured fish. We attempted to gather more information about this incident through our supply chain, but we were unable to independently corroborate the third party report.

Reporting

12. Does the company communicate, or **report**, externally on steps taken to address modern slavery? If yes, please provide details.

Communication is done via website links referenced in question 1 above, there is no formal external reporting beyond that.

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? If so, 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. Does the company participate in any regional, or sectoral, **multi-stakeholder initiatives** that address modern slavery in fishing, eg:

- a) Seafood Task Force;
- b) Bali Process Government and Business Forum;
- c) Tuna 2020 Traceability Declaration; and
- d) other?

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.

Thank you.

Further information and guidance:

- [UN Guiding Principles on Business and Human Rights](#)
- [OECD Guidelines for Multinational Enterprises](#)
- [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](#)