



# 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:** Ocean Brands

*Note: Post-survey response to our survey on modern slavery in Pacific supply chains of global canned tuna brands was received from Ocean Brands on 1st June 2019.*

## Human Rights Policy

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

No, private statements to our retail customers.

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

Yes, we have gone back to our fish brokers and processing plants and are working with them to ensure that all boats do not have any slave labour.

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

Yes already sent.

## Human Rights Due Diligence Process

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

Yes we can track every shipment from the fishing grounds to our first point of distribution. We also have a fish tracker on our website.

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?

All our plants are audited against our code of conduct. Through a SMETA or BCSI audit. We are working with our fish brokers to ensure all boats have a similar audit. In the meantime, some of our suppliers like Thai Union have installed wifi in the boats and included an app to report abuses in real time.

All CAR found in the audit must be addressed in a timely manner. If not addressed we will not purchase from those plants/boats. Any boat found to have any sign of slave labour we will not purchase from that fish broker.

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.

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.

We have worked with all our plants, MSC, Green peace, FCF fish brokers, Tri-marine and various other organizations to ensure this practices is not occurring in our supply chain.

All our partners have signed our code of conduct and ensure that no slave labour is occurring.

We are working on a few projects such as installing Block Chain through our supply chain.

We prohibited all UUI boats from our supply chain. All boats must be registered for us to source from them to ensure proper flags and no illegal fishing.

We are working with FCF to ensure all our boats are audited for social compliance audit similar to SMETA and our code of conduct.

We supported the installation of video cameras and wifi on boats for fish boats to have accountability.

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?

Human rights are a top priority it is the top of the list next to food safety.

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.

None, directly through us but through our supplier like Thai Union and FCF.

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 will not buy from that fishing fleet.

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)?

None.

## Reporting

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

None externally unless upon request.

## 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.

Working with Fish brokers to ensure the audit is effective and legal.

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; we observe the meeting notes.

Tuna 2020 Traceability Declaration; and observe again.

We are not a member but we review the meeting notes and have discussion with members.

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

None.

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](#)