



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: Organico

Human Rights Policy

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

We have an ethical and environmental policy which is referred to in part on our websites www.organic.co.uk and <https://fish4ever.blog> highlighting the quintessential issues of ethics and human rights – especially modern slavery.

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

Yes, see attached policy which adheres to EU regulations. Our tuna supplier is a small, local community of fishermen who are located in Europe, therefore all EU regulations apply – including all human rights issues. All employees are members of relevant unions who conduct regular meetings with members to identify any issue or grievance.

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

Yes, as above.

Human Rights Due Diligence Process

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

Yes, we are part of an independent full traceability system which is printed clearly on our product labels.

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

Absolutely not.

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. Firstly, we only work directly with small communities and co-operatives of fishermen, hence the supply chain is very short. Secondly, they are located within the EU and are therefore bound to adhere to all EU regulations. Thirdly, we conduct site visits as well as hold all audited documentation (IFS/BRC) for each of our suppliers. Fourthly, all employees are members of the relevant union who conducts bi-annual site visits and meetings with employees to identify any issue.

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.

Our Tuna is fished in the Atlantic only and the traceability system we use supports this.

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?

Authorities and Unions conduct frequent visits, once the supplier is certified according to IFS/BRC issues such as wages, minimum employment age et al are covers and verified by the auditors.

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 only fish tuna in the Atlantic, not the Pacific. Our fish supplier (small local community) is located and registered in the EU, therefore all EU laws apply to them – including all human rights issues. See above answers regarding unions et al.

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?

N/a, our tuna supplier is located on a tiny, remote island. The supplier is the largest employer on the island and they are extremely committed to Human Rights and Social Responsibility issues.

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, as we only fish in the Atlantic and the traceability system we use supports this.

Reporting

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

Not directly, the issues we address infer anti-slavery and other unsavoury practices. Our focus is on sustainability, traceability and transparency.

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.

No.

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.

(see article: <http://ipnlf.org/news/fishery-showcase-the-azores?platform=hootsuite>)

We are members of the International Pole & Line Foundation who collaborate with one-by-one supply chains to ensure there is a culture of integrity and respect with labour rights protected and decent working conditions provided; promote gender equality and create greater transparency and traceability (www.ipnlf.org)

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

Our tuna supplier is a small community of fishermen who have small production facilities and fleets. Therefore, it is inconceivable to even entertain the idea that they fish in the Pacific to then ship it all the way from Indonesia/ Thailand to the factory in Europe in their small boats. Our procurement chain is not global, not by a long shot.

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](#)