



# 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:** Simplot

## Human Rights Policy

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

Yes Simplot Australia has made a public commitment to respect human rights. We work not only with our suppliers, but also with relevant government and industry groups to help address human rights and labour risks in supply chains. Simplot Australia is a member of the Supplier Ethical Data Exchange and is an active supporter of the International Labour Organisation's Good Labour Practices Guidelines in Thailand. This work is in conjunction with the Royal Thai Government, the ILO (International Labour Organisation), United Nations, employees and industry associations, trade unions, NGOs and major global brands. For further information please visit

[http://www.ilo.org/asia/WCMS\\_221455/lang--en/index.htm](http://www.ilo.org/asia/WCMS_221455/lang--en/index.htm)

All of Simplot Australia's suppliers are required to meet the standards set out in the Simplot Australia Supplier Code of Conduct which can be found at <https://www.simplot.com.au/media/1416/simplot-supplier-guidelines-final-sept18.pdf>

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

Yes our commitment to address modern slavery applies to our supply chains as set out in Simplot Australia's supplier guidelines at <https://www.simplot.com.au/media/1416/simplot-supplier-guidelines-final-sept18.pdf>

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

Yes see <https://www.simplot.com.au/media/1416/simplot-supplier-guidelines-final-sept18.pdf>

## Human Rights Due Diligence Process

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

Simplot Australia has been in partnership with WWF since 2012 to achieve the highest standard in sustainable seafood. During our partnership with WWF we've undertaken significant supply chain mapping to better understand the sustainability of our seafood supply chain. We also achieved our goal of having all Skip Jack tuna in our John West range MSC certified.

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 undertake stringent due diligence as part of our supplier tender process. Further it's a requirement for direct suppliers to become a member of SEDEX and submit self-assessed questionnaires for each of their sites pertaining to Simplot Australia.

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.

Examples might include:

- i) *training* staff and management, workers, suppliers or business partners about rights, risks, responsibilities and remediation;

Simplot has implemented a Corporate and Social Responsibility Committee (made up of 4 Executive Directors) that governs all areas of CSR activity for the company including overseeing human rights risks.

- ii) *engaging* with NGOs, fishers/ their representatives (including unions) and policy-makers;

Simplot has been in partnership with WWF for more than 6 years - a key focus of the partnership is advocacy with policy makers and engaging with all tiers of our seafood supply chains.

- iii) *cascading contractual* clauses in supply agreements;

our supplier guidelines set out cascading requirements for our suppliers

- iv) *digital traceability* of fish (across entire supply chain, or part only);

yes see <http://www.traceyourfish.com.au/>

- v) *prohibition on recruitment fees*;

see Seafood Sourcing policy at <http://johnwest.com.au/sustainability>

- vi) *protective measures* to protect against exploitation of *migrant* fishers;

see seafood policy at <http://johnwest.com.au/sustainability>

vii) prohibition on sourcing from suppliers that *transship* at sea, or use *flags of convenience*;

see seafood sourcing policy <http://johnwest.com.au/sustainability>

viii) ensuring *freedom of association* and collective bargaining by fishers/ their representatives (including unions);

see seafood sourcing policy <http://johnwest.com.au/sustainability>

ix) oversight of *recruitment* or labour hire entities; and

see seafood sourcing policy <http://johnwest.com.au/sustainability>

x) independent supply chain *auditing*.

Yes – our John West Skip Jack tuna is MSC certified

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?

Simplot Australia is a member of SEDEX and requires its suppliers to be a member of SEDEX.

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.

Simplot Australia is in the process of developing a publicly available complaints mechanism for human rights. This includes the launch of a global code of conduct in 2019 that will incorporate a globally available complaints process.

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 we have developed a corrective action plan that includes classification of any human rights risks that are identified in our supply chains with the intention to work collaboratively with our suppliers to address 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)?

We did not receive any reports of instances of modern slavery in our operations or supply chains in 2018.

## Reporting

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

Simplot Australia is a privately owned company that does not currently report publicly, however, we will be complying with the requirements for reporting under the Australian Modern Slavery legislation.

## 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.

Yes the obstacles and challenges that we have faced include the scope and complexity of our global seafood supply chains. We have overcome these challenges by setting goals, raising awareness and working closely with our suppliers and partnering with NGO's like WWF.

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

a) Seafood Task Force;

Yes

b) Bali Process Government and Business Forum;

c) Tuna 2020 Traceability Declaration; and

Yes – we signed this declaration

d) other?

If yes, please provide details.

We are an active supporter of the International Labour Organisation's Good Labour Practices Guidelines in Thailand. This work is in conjunction with the Royal Thai Government, the ILO (International Labour Organisation), United Nations, employees and industry associations, trade unions, NGOs and major global brands. For further information please visit [http://www.ilo.org/asia/WCMS\\_221455/lang--en/index.htm](http://www.ilo.org/asia/WCMS_221455/lang--en/index.htm)

We participate in a number of programs through our WWF partnership including fishery improvement programs see:

<https://www.wwf.org.au/about-us/partners/john-west#gs.dD0B0J5e>

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](#)