

LET'S ALL BE



Action Plan
Vietnamese Prawn Supply Chains
Human Rights Impact Assessment

Project Background

LET'S ALL BE

Responsible
foodies

In 2022, Impactt undertook a Human Rights Impact Assessment (HRIA) on behalf of Co-op, Sainsbury's and Lyons Seafoods.

The assessment which covered our mutual prawn supply chains (processing facilities, farms, hatcheries & feedmills) in Vietnam was commissioned to help us understand the positive and negative impacts of our business practices on workers at each level of our supply chains.

The assessment was conducted by Impactt between June and October 2022 – as the world was slowly recovering from the COVID-19 pandemic, and restrictions imposed globally were being lifted.

The sites were extremely busy as international buyers were keen to travel again and audit their suppliers in Vietnam. This sadly hindered access to the sites at times.

Despite these challenges, we (Lyons Seafoods, Co-op and Sainsbury's) remain committed to raising awareness and strengthening human rights and worker welfare in our prawn Vietnamese supply chains.



For more detail, please refer to the main HRIA report.

Sainsbury's

Action Plan Human Rights Impact Assessment

	HRIA FINDINGS	Our Commitments	Responsibility	Timeline
<p>Communication and penetration of standards beyond the processing facilities - and expectations to lower tiers of supply chain</p>	<p>Processing sites had a decent understanding of our ethical and human rights due diligence policies. However, the implementation of these policies was not fully integrated at all levels of the supply chain</p>	<p>We will continue our strong efforts of engaging with other stakeholders through our SEA Alliance and FNET memberships and associated working groups and collaboration with other buyers to communicate and embed a culture of social compliance at all levels of the seafood supply chains.</p> <p>We will continue to communicate our policies and their importance to be implemented throughout the supply chain. We will support our supplier in working to embed policies and offer support.</p> <p>Lyons Seafoods will work with the suppliers to develop a communication action plan along with a set of tools to strengthen implementation of existing policies throughout the supply chains.</p> <p>https://seaa.org/ https://foodnetworkforethicaltrade.com/</p>	<p>Co-op, Sainsbury's, Lyons Seafoods</p>	<p>On-going</p>



For more detail, please refer to the main HRIA report.



Action Plan Human Rights Impact Assessment

	HRIA FINDINGS	Our Commitments	Responsibility	Timeline
Grievance mechanisms	Workers were generally aware of the existence of grievance policies. There was no evidence these had been used, nor that grievance logs were in place and issues investigated and responded to.	<p>We are committed to working with our suppliers to ensure that workers have access to an independent grievance mechanism that is Legitimate, Accessible, Predictable, Equitable, Transparent, Rights Compatible & a source of continuous learning.</p> <p>We will endeavour to better understand our suppliers' grievance mechanisms handling process and reasons why these are not being widely used.</p> <p>We will work together to identify suitable initiatives in the region and explore opportunities to expand grievance mechanisms such as worker voice.</p>	Co-op, Sainsbury's, Lyons Seafoods	On-going
Health & Safety	<p>There were some gaps in H&S training (including fire safety training) at farm level.</p> <p>At one processing site, workers are expected to pay for PPE if replacement is needed at higher frequency than 6 monthly.</p>	<p>We will work with our supplying sites to review their health and safety risk assessments, action plans and training modules.</p> <p>We will remind all our supplying sites that employers are responsible for the maintenance, storage and replacement of any PPE they provide. These should be provided free of charge.</p>	Co-op, Sainsbury's, Lyons Seafoods	6 months

For more detail, please refer to the main HRIA report.

Action Plan Human Rights Impact Assessment

	HRIA FINDINGS	Our Commitments	Responsibility	Timeline
Indirect Discrimination	At farm sites, no women or ethnic minorities were in supervisor or managerial positions	<p>We recognise there is a strong cultural preference for women to work indoors rather than in full sun.</p> <p>Together, we will explore ways to improve processes for progression of women and ethnic minorities into managerial and supervisory positions.</p> <p>We will review our suppliers hiring process and investigate how the sites can take steps to raise awareness on their equal opportunities policies.</p>	Co-op, Sainsbury's, Lyons Seafoods	On-going
	100% of workers were unaware of policies on discrimination at the workplace.	We will encourage the sites to actively raise awareness of equal treatment policies among the workforce during recruitment, on-boarding and periodically throughout the duration of employment.	Co-op, Sainsbury's, Lyons Seafoods	On-going

For more detail, please refer to the main HRIA report.

Action Plan Human Rights Impact Assessment

	HRIA FINDINGS	Our Commitments	Responsibility	Timeline
Living Wage	<p>At one processing site, there were cases where workers were not in possession of their employment contract. At one farm 30% of interviewed workers from ethnic minorities reported that they did not have a written labour contract. The farm was not able to provide any human resources data on these workers. There was a lack of clarity on wages deduction at one processing site and one feedmill.</p> <p>Despite paying above minimum wage, farm sites pay slightly below the living wage.</p>	<p>We will engage with the sites so contracts are reissued to all employees and TOR clearly communicated.</p> <p>We will collaborate with the ASC on the Vietnamese living wage measurement pilots aimed at identifying living wage gaps and supporting producers develop a wage improvement plan. The pilots will initially focus on the Camau province and roll out to other regions over time.</p>	Lyons Seafoods	On-going



For more detail, please refer to the main HRIA report.

Action Plan Human Rights Impact Assessment

	HRIA FINDINGS	Our Commitments	Responsibility	Timeline
Freedom of movement	Security restrictions on leaving the site for leave were understood to be overly restrictive as workers must get a form signed to leave and this was seen as potentially impacting workers' ability to leave. However, management clarified that this is to ensure that they are clear on who is on site at all time and there is no intention of making workers feel they cannot leave the site.	We understand that biosecurity rules were adopted by the sites to protect both workers and materials. We will engage with the sites to simplify the leave process and ensure that workers fully understand their access to leave entitlement and that they can leave the sites at their will.	Lyons Seafoods	On-going
Contractor Management	Several sites use subcontracted labour. Farm sites do not conduct detailed due diligence with its service subcontractors and its affiliated farm in line with basic human rights. The subcontractor service contracts do not clearly stipulate hours, pay, and access to social insurance between subcontractors with their workers. At one farm, no detailed HR data is kept on site for temporary workers with no provision of written contracts.	We will support the sites in the implementation of a better basic human rights diligence of service subcontractors. Lyons will provide the sites with free resources available on the Responsible Recruitment Toolkit and support the sites embedding a strong contractors' due diligence. We will continue our strong efforts of engaging with other stakeholders to support suppliers strengthen the communication requirements around human rights to subcontractors and other suppliers further down the tiers.	Co-op, Sainsbury's, Lyons Seafoods	6 months

For more detail, please refer to the main HRIA report.