

Chapter 1		Background	
Focus	<ul style="list-style-type: none"> Country: Thailand Ingredients: Seafood Sustainability pillar: Labour conditions of sea based workers Supply chain tier: Fishing vessels 	Vision	Be an industry leader in determining where the seafood is coming from & demand it is Sourced Responsibly.
Convention Nestlé Policies	<ul style="list-style-type: none"> ILO Conventions No. 29, 105, 182, 138, 111, 181, 87 and 98 Nestlé Supplier Code Nestlé Commitment on the Responsible Use of Materials from Agricultural Origin Nestlé Responsible Sourcing Guideline 	Mission	Through our partnerships with key parties, trace our upstream seafood supply chains, monitor recruitment and labor conditions on fishing vessels and implement practices as necessary to meet our Nestlé policy goals.
Objectives:	<ul style="list-style-type: none"> Operate management systems enabling upstream supply chain transparency back to origins, Deploy monitoring & remediation systems for good labor standards on fishing vessels. 	Key Parties	<ul style="list-style-type: none"> Seafood suppliers. VERITE Ltd. Achilles Ltd.
Context: Several media outlets have published articles reporting alleged labour and human rights abuses in Thailand's seafood supply chain			
Chapter 2		Pre Requisites Achieved 2014–2015	
What	With whom	When	
Supply Chain Mapping: identification of sourcing regions and locations defined as potential origins, including aquaculture farms, fish markets, ports and fishing vessels	Achilles Ltd.	December 2014	
Screening of potential partner for assessment of locations identified, partnership with VERITE	Humanity United VERITE Ltd.	February 2015	
Assessment of practices by VERITE in locations identified	Achilles Ltd. VERITE Ltd.	April to July 2015	
Reporting (see Chapter 3 for summary) of VERITE & further engagement with suppliers	VERITE Ltd.	August 2015	
VERITE and Nestlé review of some of the management systems put in place by suppliers and creation of 2015-2016 action plan	VERITE Ltd.	September 2015	

Chapter 3 Summary of VERITE Assessment findings regarding general practices observed in Thai Seafood industry

Trafficking among sea-based workers	Unclear work status resulting in vulnerability to denunciation to authorities	Finding 1
	No (or withholding of) personal identity limiting freedom of movement	Finding 2
	Incidents of job-seekers trafficked for labor, or "sold" to boat captains	Finding 3
Grievance Mechanism	Undocumented migrant workers restricted from accessing external support systems and grievance mechanisms, due to fear of retaliation, nature of the job, including limited time spent on land.	Finding 4
	No grievance procedures for workers on vessels, in ports, and in markets	Finding 5
Forced Labor and fair and equal treatment	Cost of work papers, accommodation, supplies, food deducted from wages	Finding 6
	Limited freedom of movement or freedom to quit without penalty	Finding 7
	Recruitment-related fees charged to workers, sometimes in the form of salary deductions, constraining ability to quit or risk being fired for complaining	Finding 8
	Verbal and physical abuse for complaining or for slow work	Finding 9
Workplace environment, living conditions	Hazardous work that has resulted, for some, in severe individual injuries	Finding 10
	Poor living conditions (personal care) with limited respect of privacy	Finding 11
	Use of illegal substances	Finding 12
	Poor worker health (because of unbalanced diet)	Finding 13
Wages, benefits and working time	Excessive overtime (16+ hour work days for fishermen)	Finding 14
	Wages withheld until end of employment term constraining workers from complaining or quitting	Finding 15
	Undocumented overtime	Finding 16
Child Labor	Teenage and juvenile labor	Finding 17



Typical fishing vessel



Crew, on docks once back from fishing campaign



Continuous work, even while boat is docked.



Typical cooking facilities.



Crew of approx. 30 migrant workers, at dock for 2 days, At sea for most of the month.

Chapter 4		Action Plan	
Legend:			
<ul style="list-style-type: none"> Type: Actions are divided into 3 pillars: Enabler, Implementation, Scale Up. Theme: Actions are divided into 3 pillars: Policy & Education, System & Remediation, Stakeholder outreach & collaboration. Leader: Party enabling or supporting execution of Action Plan. Finding Addressed: Refers to Finding identified as part of the VERITE summary. Action is addressing the Findings listed. 			
Type	Objective	Action	1
Enabler	Based on the current signature of the Nestle Supplier Code, incorporate new business requirements into commercial relationship.	<p>Work closely with suppliers to ensure development and implementation of capacity building programs and business requirements that address human rights and labour standards and demonstrate compliance on an ongoing basis.</p> <ul style="list-style-type: none"> At a minimum the supplier shall run a traceability system enabling the identification of all potential origins (farms, mills, back to fishing vessels) linked with seafood and other ingredients used as part of product recipes. Additionally that the supplier shall operate a seafood responsible sourcing program to ensure that origins identified are continuously assessed and assisted in meeting business requirements detailed in the Nestle Responsible Sourcing Guideline. Industry wide verification method and certification schemes can be recognized as equivalent to a company owned responsible sourcing program. 	
Theme			
System & Remediation			
Leader			
Nestle			
Finding Addressed			
-			
Timeline			
January 31 st 2016			
Type	Objective	Action	2
Enabler	Enforce traceable supply chains identifying all potential sources of origins as part of a comprehensive supply chain risk assessment.	<p>Ensure a verifiable supply chain traceability system as part of a comprehensive supply chain risk assessment that is aligned with industry partners and stakeholders within the Thailand Seafood Industry enabling traceability of seafood ingredients from fishing vessels through the complete supply chain to the receiving manufacturing sites and finished products.</p> <ul style="list-style-type: none"> This management system shall trigger the use of an identification system for fishing vessels, based on the Thailand Flagship & registration numbers required by law. Segregation of supply from identified and registered vessels shall be then made <p><i>KPIs to consider: % of volume traceable.</i></p>	
Theme			
System & Remediation			
Leader			
Seafood Suppliers assisted by Nestle			
Finding Addressed			
-			
Timeline			
March 31 st 2016			

Type	Objective	Action	
Implementation	Define and communicate requirements to boat owners and/or captains, including recruitment practices and living/working conditions for boat workers.	Building on the Marine Catch Purchasing Document, or any other industry recognized best practice; create a set of requirements for boat owners and captains. Requirements will: <ul style="list-style-type: none"> • Be communicated to boat owners (e.g. through contract or visuals), • Cover traceability, recruitment practices, fish catching system, living and working conditions for boat workers, • Be potentially handed over with an implementation toolkit composed of Employment Contract Template and rules, Worker ID cards, template to monitor worker's names, working time, salary, and associated deductions if any. Implementation will be verified by [7]. <i>KPIs to consider: % of boats coached vs. requirements set.</i>	3
Theme			
System & Remediation			
Leader			
Seafood suppliers assisted by VERITE			
Finding Addressed			
1,2,3,7,8,9,14,15			
Timeline			
May 31 st 2016			
Implementation	Implement a training program for boat owners and/or captains.	<ul style="list-style-type: none"> • Based on requirements set [3], and together with industry partners and stakeholders within the Thailand Seafood Industry, create a training hub to generate awareness and provide education to ensure effective worker protections in priority areas as determined by Verite. This training hub may take the form of a "demonstration boat" or "university" where a training program will be given to electable boat owners/captains. As reward and enabler for continuous improvement, program will include a mechanism to apply for financial support to speed up the implementation of best practices learned. • Based on the application to the mechanism for financial support, award financial support (in the form of sponsoring or micro credit) for e.g. worker personal protective and care equipment's, boat lodging and cooking facilities etc. Effective use of financial support will be verified by [7]. <i>KPIs to consider: Number of trainees vs. number of boat owners/captains.</i>	4
Theme			
Policy & Education			
Leader			
Seafood suppliers assisted by Nestle			
Finding Addressed			
2,3,6,10,16			
Timeline			
September 31st 2016			
Implementation	Implement an awareness raising campaign on human rights and labour conditions, targeting primarily boat workers.	In cooperation with local authority and industry partners and stakeholders in the Thailand Seafood Industry, create an awareness raising campaign, addressing at 1 st the topics of labour standards & health and safety at the workplace. <ul style="list-style-type: none"> • Campaign to be deployed in locations identified as impactful for migrant workforce & linked with regular boat's docking, including the introduction of a grievance mechanism & providing some immediate tangible personal benefits to workers (distribution of free personal & safety care Findings, foods, or equipment's such as cap/gloves/sunglasses). 	5
Theme			
Policy & Education			
Leader			
Seafood suppliers assisted by VERITE			
Finding Addressed			

4,5,11,12,13		<ul style="list-style-type: none"> Campaign will incorporate an anonymous reporting system to identify worst form of labor conditions to be addressed by the Emergency Response Team (see [6]). <p>Highlights of the campaign will be incorporated into [4].</p> <p><i>KPIs to consider: Number of trainees, number of sessions.</i></p>	
Timeline			
September 31st 2016			
Type	Objective	Action	
Implementation	Enable the work of a Migrant Workforce Emergency Response team.	Identify a 3 rd party partner [e.g. MWRN, LPN, Project Issara, <i>to be considered</i>] experienced in protecting individuals from the worst form of labour conditions. Deploy and empower this partner organization as the Migrant Workforce Emergency Response Team: <ul style="list-style-type: none"> Team will be in charge to deploy the necessary assessments (based on [5] and [7]) to identify individuals in need of immediate assistance. Team will be assisted by a network of other 3rd party local NGOs, to be funded by parties, having the authority to immediately remediate and mobilize any sort of short term actions to protect the human integrity of the identified individuals (up to e.g. buying debt, regularising working permit, relocating individuals). <p><i>KPIs to consider: Number of individuals assisted vs. mapped in need.</i></p>	6
Theme			
System & Remediation			
Leader			
VERITE			
Finding Addressed			
7,8,9,10,11,17			
Timeline			
September 31st 2016			
Type	Objective	Action	
Implementation	Create and implement a fishing vessels verification program.	<ul style="list-style-type: none"> By leveraging opportunities to collaborate with industry partners and stakeholders in the Thailand Seafood Industry, implement, at first, an internal audit program verifying working (labor and health and safety at workplace) conditions in fishing vessels for 100% of the fleet used Secondly, alongside with monitoring of compliance through Key Performance Indicators, randomly select boats on a monthly basis to undergo a 3rd party verification audit by an independent organization, executed every quarter. 3rd party verification audit should include interview of boat workers and establish history of their working career in the region and country. <p>Such inspection will contribute to [2] [3] [4].</p> <p><i>KPIs to consider: % of boats audited, % compliant, % of square fleet sampling</i></p>	7
Theme			
System & Remediation			
Leader			
Seafood suppliers assisted by Nestle			
Finding Addressed			
All			
Timeline			
December 31st 2016			
Type	Objective	Action	
Implementation	Dedicate resources.	Mandate a Nestle leader to the implementation of the action plan: Part Time or Full Time Job [To be confirmed] profile will include coordination with relevant parties, management of	8
Theme			

System & Remediation		implementation activities, establishment of KPIs and dashboard, effective use of internal and financial resources dedicated, representation to relevant industry parties & stakeholders.	
Leader			
Nestle			
Finding Addressed		<i>KPIs to consider: Delivering on KPIs created per actions.</i>	
-			
Timeline			
March 1 st 2016			
Type	Objective	Action	
Scale Up			
Theme			
Stakeholder outreach & collaboration		<ul style="list-style-type: none"> Leverage opportunities for collaboration with industry partners and stakeholders with in the Thailand Seafood Industry and seek to become a member of the Shrimp Sustainable Supply Chain Taskforce, share progresses on implementation of action plan and learning, contribute to testing of innovative solutions and continuously seek to enlarge implementation to other supply schemes and locations in South East Asia. Achieve similar aims as part of the Good Labour Practices Working Group, convened by Government of Thailand and supported by the International Labor Organization. 	9
Leader	Collaborate and scale up.		
Nestle			
Finding Addressed		<i>KPIs to consider: Number of best practices created, shared and scaled up.</i>	
All			
Timeline			
January 1 st 2016			
Type	Objective	Action	
Scale Up			
Theme			
Stakeholder outreach & collaboration		Report publicly on progresses, including challenges and failures identified with how to best resolve and solutions to address. This should include ongoing monitoring of business partners' supply chain management systems by independent third party assessments and identification of risks and issues to be addressed.	10
Leader	Publicly Report.		
Nestle			
Finding Addressed			
All			
Timeline			
Annually 2016->			

Disclosure:

This document will be updated on a quarterly basis effective January 1st 2016 to reflect progresses made. Parties named in this document cannot be made responsible for the performance of the implementation of this Nestlé Action plan but have committed to contribute to its success to their maximum extend.