

	QUALITY MANAGEMENT SYSTEM	ISSUED: 04/10/22
REF NO: QPOL010	Anti-Slavery & Human Trafficking Statement	VERSION: 8.0

Introduction

This statement sets out Fastnet Fish Limited’s actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business or in its supply chains.

Fastnet Fish Limited is fully committed to taking the necessary actions to prevent the abuse of workers at all stages within our supply chain and to comply with the provisions of the UK Modern Slavery Act (2015).

We operate a zero tolerance towards Modern Slavery not only because it is our legal obligation to do so but because it is the right thing to do.

This statement relates to actions and activities during the current financial year 1st April 2022 to 31st March 2023.

Organisational Structure

Founded in 1980 Fastnet Fish Limited and its subsidiaries are engaged in the sourcing of fresh fish, frozen seafood and related frozen food products worldwide for its customers in the processing, wholesale, catering and retail sectors. The main office and cold storage facilities are based in Grimsby, with processing facilities at Fort William and sales/depots located in Paddock Wood, Ipswich, Reading, Plymouth and Westport, County Mayo Southern Ireland.

Seafood supply chain


As part of the global seafood industry our organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

As this business is involved in the sourcing and procurement of seafood we are aware of the risks and issues associated with the occurrence in the seafood supply chain, unwittingly or otherwise, of modern slavery.

Fastnet Fish Limited considers slavery of any kind to be unacceptable from an ethical, moral, financial and reputational standpoint and will not knowingly or otherwise engage in trade with companies or their supply chains involved in this practice.

Our products may be sourced from wild marine capture fisheries in any of the world’s oceans or farmed in land or marine based aquaculture sites.

Purchases may be made directly from fishing vessels, their agents, or from land based processors and farms.

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Our business makes purchases of various marine capture and aquaculture raised species from the following countries:

Argentina, Bangladesh, Canada, China, Chile, Denmark, Faroe, France, Germany, Greece, Greenland, Iceland, Ireland, India, Indonesia, Lithuania, Morocco, New Zealand, Norway, Netherlands, Poland, Portugal, Russia, Spain, Sri Lanka, South Africa, Thailand, Turkey, United Kingdom, USA, Vietnam.

Risk assessment

The company assesses a supplier through a combination of self- audits and site visits using the ETI Base Code as a benchmark which is internationally recognised as a code of labour practice based on national law and international labour standards. Fastnet fish are also members of SEDEX (Supplier Ethical Data Exchange) (<https://www.sedex.com/>). The Company, through the response to these audits, analyses verifiable information about its suppliers' ability to comply with the ETI Base Code and uses this information to make informed sourcing decisions.

Within the global seafood industry both the catching and processing sectors are, in some regions, known to carry the risk of having human rights issues. As examples, illegal and or migrant workers may be deceived into enduring prolonged non voluntary periods of working on fishing vessels without payment or benefits and subjected to threats and physical abuse. It is recognised that fishing is a high risk occupation often voluntarily requiring long working hours in physically unpleasant conditions. Fastnet Fish Limited is aware however through media articles, and NGO reports, of human rights abuses on board some fishing vessels where crews are forced to work in unsafe and unsanitary conditions without sleep, rest or sustenance for excessive hours under the threat of physical abuse.

Therefore, our business will only source seafood directly or indirectly from known registered fishing vessels which comply with recognised international maritime codes of practice such as the Maritime Labour Convention. Again the relevant clauses of the ETI Base Code apply.

The forced retention and abuse of illegal migrant and child labour in poorly regulated seafood processing factories are abuses of human rights which NGO and media investigations have uncovered as well as in our own experience. Seafood processing factories and suppliers of aquaculture products are expected to meet with the requirements of the ETI Base Code as part of our supplier approval procedures. In addition, some of our supply chains are audited against third party standards such as ASC (Aquaculture stewardship Council) whose audits include ethical labour standards.

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Fastnet Fish Limited hold a MSC (Marine Stewardship Council) Chain of Custody certification and as such welcome the introduction by the MSC of the Third Party Labour Requirements which are designed to reduce reputational risk, give assurance to the consumer and ensure that MSC are not associated with entities with forced labour violations.

Suppliers are re assessed on an annual basis.

Our supplier approval procedure which includes our forms QAS020 or QAS020A Supplier Ethical Questionnaires and QAS035 Supplier Human Trafficking and Anti-Slavery Commitment is the responsibility of the Technical Manager with accountability being with the Managing Director. If a supplier functions as a Trader, Agent, Wholesaler, Importer or other function that does not directly catch or manufacture product they must ensure that each supplying site has individually completed the required supplier approval documents.

We expect our suppliers to comply with our ethical standards. As such, and as part of our supplier approval process, we will formally request each supplier respond to confirm that they meet with anti -slavery and human trafficking considerations within their own business. Further to this that they carry out due diligence procedures with respect to slavery and human trafficking in the selection of their own suppliers.

In addition, Fastnet Fish Ltd carry out an analysis of their supply chains in order to identify the risks associated with the purchasing and distribution of seafood.

The end to end supply chain analysis identifies risks which includes the handling or purchase of product which may have been caught or processed by the use of forced or trafficked labour.

Risk is assessed by supplier, country of origin and the mitigations and considerations that are in place to ensure that illegal labour and human trafficking risks are assessed.

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Training

Our employees are briefed as part of our training programme to understand and operate within the ethical and anti-slavery rules set out by the company.

QPOL021 UK Modern Slavery Act Training Policy was approved on 4th October, 2022 by the Managing Director who will review and/or update it annually.



Matt Renshaw
Managing Director
Fastnet Fish Ltd

Date: 04/10/2022