

Report title	Sector/Fishery Assessment or Ingredient Manufacturer Assessment Summary Report, v1.0
Indicator	2.2.11
Instructions	<p>This template is intended for reporting a summary of Due Diligence pathway 2 (Ingredient Manufacturer assessment) or 3 (Ingredient manufacturer assessment) under Principle 2. Reporting is at a UoC level and on an annual basis.</p> <p>The UoC should select the pathway used and the type of assessment (whether ingredient manufacturer or plant/primary raw material).</p> <p>The UoC enters the date the assessment was conducted.</p> <p>The UoC selects the primary raw material assessed (if applicable). If primary raw material is not used, the UoC enters the common name and latin name.</p> <p>The UoC selects the risk factor assessed.</p> <p>The UoC selects the country of location (ingredient manufacturer) or production (plant primary raw material). For marine primary raw material, 'Fishery' is selected as the Country of location.</p> <p>The UoC selects the FAO fishing area for the marine primary raw material.</p> <p>The UoC enters a summary description of the risk assessment (max 1500 characters).</p> <p>The UoC enters links to any publicly available resources used.</p> <p>The UoC enters a summary description of any measures taken to ensure low risk (for ingredient manufacturer assessment only) (max 1500 characters).</p> <p>The UoC enters a summary description of implemented monitoring programs to ensure the effectiveness of any measures taken to ensure low risk (if applicable) and to monitor the risk factors, or indicators for the risk factors, to ensure the risk level determined remains valid (max 1500 characters).</p> <p>A new row should be added for each assessment and for each risk factor assessed (if more than one).</p>

Pathway used	Type of Assessment	Date of Due Diligence Assessment (yyyy-mm-dd)	Primary Raw Material ("Common name Latin name")	Risk Factor Assessed	Country of location/production (select 'Fishery' if Marine primary raw material)	FAO Fishing area (if Marine primary raw material)	Summary description of risk assessment (max 1500 characters)	Links to any publicly available resources used	Summary description of any measures taken and their effectiveness (max 1500 characters)	Summary description of implemented monitoring program (max 1500 characters)
Pathway 3 Ingredient Manufacturer assessment	Ingredient Manufacturer	2024-03-01	Sunflower (Helianthus Annuus)	Legal	India		Legality of Operations - All relevant Licenses are held by each Manufacturer.		Suppliers have provided full range of legal documentation and Policies available for Bribery and Corruption Discussed with all Manufacturers these policies and procedures to ensure Child Labour is not present in the supply chain	Desk Top Audits to be carried out and Physical Audits to ensure Policies being carried out
Pathway 3 Ingredient Manufacturer assessment	Ingredient Manufacturer	2024-03-01	Guar (Cyamopsis Tetragonoloba)	Social	India		Social well being and Child Labour - forced Labour - All suppliers have provided Policies and Procedures on Social Welfare including Child Labour and Bonded Labour. Government of India has a number of policies in place to improve Agricultural welfare and protection of Education. Manufacturers are keen to assist in Educational provision and progress with Indian Gov goal of providing free Education.	[1] Bonded Labour in India: Prevalence, The Prevalence Foundation (2023)	Suppliers have provided full range of legal documentation and Policies available for Bribery and Corruption Discussed with all Manufacturers these policies and procedures to ensure Child Labour is not present in the supply chain	Desk Audits to confirm Policies etc being carried out. Physical Audits to be put in place. Improved Viability of the Supply Chain and acceptance of Manufacturers code of conduct down the tiers
Pathway 3 Ingredient Manufacturer assessment	Ingredient Manufacturer	2024-03-01	Guar (Cyamopsis Tetragonoloba)	Environmental	India		Environmental Management - Discussed with all IM these policies and procedures for Environmental Compliance Procedures received and reviewed.		Suppliers have provided evidence of Policies and Certification for Waste other Environmental impacts	Desk Audits to confirm Policies etc being carried out. Physical Audits to be put in place. Improved Viability of the Supply Chain and Environmental impact
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	2024-03-01	Guar (Cyamopsis Tetragonoloba)	Legal	India		Land ownership and legal ownership - low land use for Guar Cultivation. Land ownership controlled through cooperative societies.	Agricultural Statistics as a Global (2022) - FAO (2023)	Review of Government Land use and laws.	Monitor and discuss with Suppliers at Audit
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	2024-03-01	Guar (Cyamopsis Tetragonoloba)	Social	India		Risk of Child Labour and Bonded Labour - Government of India introduced Bonded Labour abolition Act in 1976. On field searches do not present Guar cultivation as having child labour or bonded labour as a key risk - low labour requirements in the process. Indian Government looking to improve Policies around Child Labour and Bonded Labour including the 1986 Child Labour Act.	[1] Bonded Labour in India: Prevalence, The Prevalence Foundation (2023)	Assessing the Government response to Child and Bonded Labour - ILO ratifications in place on Child and Young Workers	Only way to assess the risk of Child Labour and Bonded Labour is through Physical Audits - these are to be arranged during 2024 - 2025.
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	2024-03-01	Guar (Cyamopsis Tetragonoloba)	Environmental	India		Environmental Risk - illegal Deforestation - limited forest cover shown through Global Forest Watch. Land under Guar Cultivation has been decreasing presenting a limited threat of illegal deforestation. Small scale farms do not suggest Guar Cultivation is a driver of Agricultural expansion. Guar has also a very low Environmental impact as demonstrated by its ability to convert to Organic Agricultural production.	ISIRI: Rajasthan Forest Review 2021 - Rajasthan I.R.OI Forest Protection Information: World Forest Map A 'New Green Change Data' (CGIAR) (2024) (www.worldagroforestrycentre.org)	Review of Land use in the region	Continue to monitor the areas of Land use and assess Global risk.
Pathway 3 Ingredient Manufacturer assessment	Marine Primary Raw Material	2023-12-01	Anchovy (Engraulis encrasicolus)	Social	South Africa	FAO 47	Child Labour and Bonded Labour - Code of Conduct in operation that Suppliers must sign - covers ILO 138 noc child labour. Fishing vessels are inspected annually by SAMS. This covers safety inspections on board. Crew Checklist is available that covers all aspects of employment including Age this is available at all times for inspection. Government observes some unannounced to verify catch levels against Quotas. Compliant with ILO No 188 - Work in Fishing Industry		Supplier has provided documentary evidence of vessel safety Certificates and Crew Contracts. Biomar has also physically Audited this supplier in Oct 2023	Continue to gain information on Suppliers auditing of Fishing Vessels and audit on a regular basis.
Pathway 3 Ingredient Manufacturer assessment	Marine Primary Raw Material	2024-12-01	Redeye round herring (Etrumeus whitehead)	Social	South Africa	FAO 47	Child Labour and Bonded Labour - Code of Conduct in operation that Suppliers must sign - covers ILO 138 noc child labour. Fishing vessels are inspected annually by SAMS. This covers safety inspections on board. Crew Checklist is available that covers all aspects of employment including Age this is available at all times for inspection. Government observes some unannounced to verify catch levels against Quotas. Compliant with ILO No 188 - Work in Fishing Industry		Supplier has provided documentary evidence of vessel safety Certificates and Crew Contracts. Biomar has also physically Audited this supplier in Oct 2023	Continue to gain information on Suppliers auditing of Fishing Vessels and audit on a regular basis.
Pathway 3 Ingredient Manufacturer assessment	Marine Primary Raw Material	2024-12-01	Sardine (Sardinops sagax)	Social	South Africa	FAO 47	Child Labour and Bonded Labour - Code of Conduct in operation that Suppliers must sign - covers ILO 138 noc child labour. Fishing vessels are inspected annually by SAMS. This covers safety inspections on board. Crew Checklist is available that covers all aspects of employment including Age this is available at all times for inspection. Government observes some unannounced to verify catch levels against Quotas. Compliant with ILO No 188 - Work in Fishing Industry		Supplier has provided documentary evidence of vessel safety Certificates and Crew Contracts. Biomar has also physically Audited this supplier in Oct 2023	Continue to gain information on Suppliers auditing of Fishing Vessels and audit on a regular basis.
Pathway 3 Ingredient Manufacturer assessment	Marine Primary Raw Material	2024-01-01	Atlantic herring (Clupea harengus)	Social	Fishery	FAO 27	Risk to Child Labour or forced labour - Crew Requirements monitored by Danish Authorities. Danish Fisheries have enforcement vessels who inspect at Sea - reporting into the Public Domain each year. Signed up to the ILO for Marine Labour Conventions and age work in fishing convention.	Danish Fisheries Agency Issues Annual Inspection Report 2022 (fisherystatistik.com). Key to becoming part of fishable (blue) (www.fishable.org.uk) - Farming (Crew Terms) - Our Shared Sea	Supplier will be converting to the new Marlin Trust V3 which will cover Social aspects needed by IAC - to be in place by May 25. Crew Documentation to be reviewed from Supplier as inspected by Danish Authorities	Follow up on Crew Compliance and Danish Fisheries. From May 25 as part of new Marlin Trust Standard a social Responsibility Risk assessment will be completed as part of the new standard.
Pathway 3 Ingredient Manufacturer assessment	Marine Primary Raw Material	2024-03-01	Boarfish (Capros aper)	Social	Fishery	FAO 27	Risk of Human Trafficking and Labour issues concerning non EEA workforce - Irish Fishing Industry undertook a review in 2016 to review its position on moon Irish working and Migrant working. From a working point of view the Irish Government regulate the industry and ensure all vessels have Health and Safety training and comprehensive log books and working time directives. Fishing vessels fall under the Health and Safety at Work Act 2005 and inspectors can inspect on board conditions at any time. Ireland is part of the ILO and has ratified 9 Fundamental Conventions and the MLC 2006 Maritime Labour Convention. There has been an improvement in the Global Slavery Index score making them a low Risk country now at 888. There is an Irish Human Rights	https://www.walkfree.org/global-slavery-index/irish-human-rights-and-equality-commission	As well as reviewing Government actions the supplier also has undertaken to conduct its own supplier appraisal and have a code of conduct and checking the EU fleet list for compliance to Health and Safety. A RM boat specification also ensures compliance and Modern Day slavery statements are in existence.	Supplier is looking to employ a 3rd Party organisation to undertake vessel audits and inspections. Need to keep monitoring the situation. Also the supplier will be covered by the new version of Marlin Trust V3 by I
Pathway 3 Ingredient Manufacturer assessment	Marine Primary Raw Material	2024-03-01	Blue Whiting (Merluccius maximus)	Social	Fishery	FAO 27	Risk of Human Trafficking and Labour issues concerning non EEA workforce - Irish Fishing Industry undertook a review in 2016 to review its position on moon Irish working and Migrant working. From a working point of view the Irish Government regulate the industry and ensure all vessels have Health and Safety training and comprehensive log books and working time directives. Fishing vessels fall under the Health and Safety at Work Act 2005 and inspectors can inspect on board conditions at any time. Ireland is part of the ILO and has ratified 9 Fundamental Conventions and the MLC 2006 Maritime Labour Convention. There has been an improvement in the Global Slavery Index score making them a low Risk country now at 888. There is an Irish Human Rights	https://www.walkfree.org/global-slavery-index/irish-human-rights-and-equality-commission	As well as reviewing Government actions the supplier also has undertaken to conduct its own supplier appraisal and have a code of conduct and checking the EU fleet list for compliance to Health and Safety. A RM boat specification also ensures compliance and Modern Day slavery statements are in existence.	Supplier is looking to employ a 3rd Party organisation to undertake vessel audits and inspections. Need to keep monitoring the situation. Also the supplier will be covered by the new version of Marlin Trust V3 by I
Pathway 3 Ingredient Manufacturer assessment	Marine Primary Raw Material	2024-03-01	Cod (Gadus morhua)	Social	Fishery	FAO 27	Risk of Human Trafficking and Labour issues concerning non EEA workforce - Irish Fishing Industry undertook a review in 2016 to review its position on moon Irish working and Migrant working. From a working point of view the Irish Government regulate the industry and ensure all vessels have Health and Safety training and comprehensive log books and working time directives. Fishing vessels fall under the Health and Safety at Work Act 2005 and inspectors can inspect on board conditions at any time. Ireland is part of the ILO and has ratified 9 Fundamental Conventions and the MLC 2006 Maritime Labour Convention. There has been an improvement in the Global Slavery Index score making them a low Risk country now at 888. There is an Irish Human Rights	https://www.walkfree.org/global-slavery-index/irish-human-rights-and-equality-commission	As well as reviewing Government actions the supplier also has undertaken to conduct its own supplier appraisal and have a code of conduct and checking the EU fleet list for compliance to Health and Safety. A RM boat specification also ensures compliance and Modern Day slavery statements are in existence.	Supplier is looking to employ a 3rd Party organisation to undertake vessel audits and inspections. Need to keep monitoring the situation. Also the supplier will be covered by the new version of Marlin Trust V3 by I
Pathway 3 Ingredient Manufacturer assessment	Marine Primary Raw Material	2024-03-01	European Anchovy (Engraulis encrasicolus)	Social	Fishery	FAO 27	Risk of Human Trafficking and Labour issues concerning non EEA workforce - Irish Fishing Industry undertook a review in 2016 to review its position on moon Irish working and Migrant working. From a working point of view the Irish Government regulate the industry and ensure all vessels have Health and Safety training and comprehensive log books and working time directives. Fishing vessels fall under the Health and Safety at Work Act 2005 and inspectors can inspect on board conditions at any time. Ireland is part of the ILO and has ratified 9 Fundamental Conventions and the MLC 2006 Maritime Labour Convention. There has been an improvement in the Global Slavery Index score making them a low Risk country now at 888. There is an Irish Human Rights	https://www.walkfree.org/global-slavery-index/irish-human-rights-and-equality-commission	As well as reviewing Government actions the supplier also has undertaken to conduct its own supplier appraisal and have a code of conduct and checking the EU fleet list for compliance to Health and Safety. A RM boat specification also ensures compliance and Modern Day slavery statements are in existence.	Supplier is looking to employ a 3rd Party organisation to undertake vessel audits and inspections. Need to keep monitoring the situation. Also the supplier will be covered by the new version of Marlin Trust V3 by I
Pathway 3 Ingredient Manufacturer assessment	Marine Primary Raw Material	2024-03-01	Haddock (Melanogrammus aeglefinus)	Social	Fishery	FAO 27	Risk of Human Trafficking and Labour issues concerning non EEA workforce - Irish Fishing Industry undertook a review in 2016 to review its position on moon Irish working and Migrant working. From a working point of view the Irish Government regulate the industry and ensure all vessels have Health and Safety training and comprehensive log books and working time directives. Fishing vessels fall under the Health and Safety at Work Act 2005 and inspectors can inspect on board conditions at any time. Ireland is part of the ILO and has ratified 9 Fundamental Conventions and the MLC 2006 Maritime Labour Convention. There has been an improvement in the Global Slavery Index score making them a low Risk country now at 888. There is an Irish Human Rights	https://www.walkfree.org/global-slavery-index/irish-human-rights-and-equality-commission	As well as reviewing Government actions the supplier also has undertaken to conduct its own supplier appraisal and have a code of conduct and checking the EU fleet list for compliance to Health and Safety. A RM boat specification also ensures compliance and Modern Day slavery statements are in existence.	Supplier is looking to employ a 3rd Party organisation to undertake vessel audits and inspections. Need to keep monitoring the situation. Also the supplier will be covered by the new version of Marlin Trust V3 by I

Pathway 3 Ingredient Manufacturer assessment	Ingredient Manufacturer	2024-04-11	Sunflower (Helianthus Annuus)	Social	Argentina		Argentinian worker rights are well covered by several comprehensive labour laws including the right to collective bargaining (20744) Health Insurance Act (23600) Child Labour is also prohibited as well as Education being a key target in Argentina. Good Social care packages on offer as well as a 13th Monthly Bonus. Sunflower production is highly mechanised reducing the threat of Child Labour. This Producer has a number of policies concerning human rights, workers rights no child labour and an extremely comprehensive benefits policy all noted in the Due Diligence report. Producer is also looking to obtain SMETA accreditation.		Ensure SMETA application covered	Monitor and review as per ASC requirement
Pathway 3 Ingredient Manufacturer assessment	Ingredient Manufacturer	2024-04-11	Sunflower (Helianthus Annuus)	Environmental	Argentina		Agricultural improvement has been a key focus for Sunflower Production and better use of land with sunflower often being used as a break crop. Area of Production is generally south of the key regions at risk from Deforestation. Argentina has been a member of the Paris Agreement since 2016 and there is a National Forest Law in place (25312) as well as an Agricultural Improvement Law (25088). Looking at GFW statistics there has been a vast improvement in the loss of land to Deforestation but this is still at risk in Argentina though it seems grown mostly from Soya and Beef Farming. Producer has a full Health, Safety and Environmental Policy monitoring their environmental impact to the surroundings.	Argentina (Deforestation Rates & Statistics) GFW (ghslu@worldagrovet.com)	The Producer has spent a considerable amount of time and effort on its sustainability and environmental impact - it uses renewable energy in its production facilities and has signed up to the Kyoto principle.	Monitor GFW
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	2024-04-11	Sunflower (Helianthus Annuus)	Legal	Argentina		Sunflower is purchased through a Global Trader that strictly monitors its Producers - the Producer is able to supply relevant legal documentation to prove compliance as low risk. Argentina also adheres to the ILO basic fundamental rights.		Obtain all relevant Producer legal documentation	Monitor and obtain Producer Documentation
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	2024-04-11	Sunflower (Helianthus Annuus)	Social	Argentina		Argentinian worker rights are well covered by several comprehensive labour laws including the right to collective bargaining (20744) Health Insurance Act (23600) Child Labour is also prohibited as well as Education being a key target in Argentina. Good Social care packages on offer as well as a 13th Monthly Bonus. Sunflower production is highly mechanised reducing the threat of Child Labour. Producer has demonstrated that the Sunflower Seeds are formed in areas that are not a risk to indigenous population see DD.			
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	2024-04-11	Sunflower (Helianthus Annuus)	Environmental	Argentina		Agricultural improvement has been a key focus for Sunflower Production and better use of land with sunflower often being used as a break crop. Area of Production is generally south of the key regions at risk from Deforestation. Argentina has been a member of the Paris Agreement since 2016 and there is a National Forest Law in place (25312) as well as an Agricultural Improvement Law (25088). Looking at GFW statistics there has been a vast improvement in the loss of land to Deforestation but this is still at risk in Argentina though it seems grown mostly from Soya and Beef Farming.	Argentina (Deforestation Rates & Statistics) GFW (ghslu@worldagrovet.com)	The Producer has spent a considerable amount of time and effort on its sustainability and environmental impact - it uses renewable energy in its production facilities and has signed up to the Kyoto principle.	Monitor GFW.