

Report title
Indicator

Sectoral/fisherv Assessment or Ingredient Manufacturer Assessment Summary Report. v1.0
2.2.11

Instructions

This template is intended for reporting a summary of Due Diligence pathways 2 "sectoral/fishery assessment" or 3 "ingredient manufacturer assessment" under Principle 2. Reporting is at a UoC level and on an annual basis.

The UoC should select the pathway used and the type of assessment (whether ingredient manufacturer or plant/marine primary raw material).

The UoC enters the date the assessment was conducted.

The UoC selects the primary raw material assessed (if applicable). If primary raw material is not listed, the UoC enters the common name and latin name.

The UoC selects the risk factor assessed.

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.

The UoC selects the FAO fishing area for the marine primary raw material.


The UoC enters a summary description of the risk assessment (max 1500 characters).

The UoC enters links to any publicly available resources used.

The UoC enters a summary description of any measures taken to ensure low risk (for ingredient manufacturer assessment only) (max 1500 characters).

The UoC enters a summary description of implemented monitoring program to a) measure the effectiveness of any measure taken to ensure low risk (if applicable) and b) monitor the risk factors, or indicators for the risk factors, to ensure the risk level determined remains valid (max 1500 characters)

A new row should be added for each assessment and for each risk factor assessed (if more than one).



| Table 1. Summary of due diligence pathways 2 and 3 report | | | | | | | | | | |
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| 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 2 Sector/Industry/Fishery assessment | Ingredient Manufacturer | 2025-04-18 | n.a | Social | Denmark | FAO 27 | Denmark is evaluated as medium risk in ASC Country Risk Scorecard, due to medium score in TIP Rank. Tier 2, in the Trafficking in Persons Report from 2022 and due to medium score in the Global Slavery Index from 2018. | OSI-Snapshot-Denmark.pdf TIP-Report-2024_Introduction_V10_508-accessible_2-13-2023.pdf The Global Slavery Index 2023. | A new Trafficking in Persons Report from 2024 has been published, which evaluate Denmark as Tier 1 = low risk. Regarding the Global Slavery Index, which scores Denmark as medium risk in the index from 2018, there has been publicized a new index from 2023, which evaluate Denmark as low risk | Monitoring changes in ASC country risk score card, Denmark's scoring in Trafficking in Persons Reports and the Global Slavery Index. |
| | | 2025-02-01 | n.a | | Norway | FAO 48 | Investigation of how the supplier (ingredient manufacturer) ensures that child labour and forced labour do not occur. | | All suppliers must sign and adhere to the Supplier Declaration. The Supplier Declaration explicitly states no forced, slave or involuntary labour. The manufacturer also have a Code of Conduct for Business Partners which states their principles regarding Human rights, Health and Safety, Minimum Age og Labor, Forced labor, Freedom of Association & Right to Collective Bargaining and Employment Parties. Where vessels are operated with a contract crew, they must sign the Supplier Declaration and are subject to audit. The company have obligations to report under the Norwegian Transparency Act regarding their own due diligence procedures for human rights. | *Monitoring changes in the suppliers procedures. Follow up on the suppliers ambitions for 2024, hereunder human rights and decent working conditions. *Monitoring changes in list of certification schemes accepted under the ASC Feed Standard. |
| Pathway 3 Ingredient Manufacturer assessment | Marine Primary Raw Material | 2025-02-01 | n.a | Social | Denmark | FAO 27 | Investigation of how the supplier (ingredient manufacturer) ensures that child labour and forced labour do not occur. | Unsustainable Fishing and Farming (Ocean Threats) - Our Shared Seas. Crew Requirements Danish Fisheries Agency - Krav til besætningen på fiskeskibe (dma.dk). The Global Slavery Index /forced labour at sea. Crew Requirements Danish Fisheries Agency - Krav til besætningen på fiskeskibe (dma.dk) | Danish Govt Regulation of Fishing Vessels Crew requirements and competences are regulated by the Danish Maritime Authority who have specific requirements for crew to have a health certificate and appropriate training. The Danish Fisheries Agency have enforcement vessels who carry out inspections at sea and report them in the public domain each year. Report on Modern Slavery Prevalence Denmark is rated as a country with LOW risk of modern slavery in the fishing industry. | *Follow up with suppliers and Danish Fisheries Agency regarding crew compliance as part of vessel inspections *Follow up with suppliers re, social risk assessments and code of conducts for suppliers *A Social Responsibility Risk Assessment must be completed on all vessels supplying whole fish under MarinTrust Standard V3. Greater due diligence procedures on social risk will become embedded as a requirement of the standard. *Monitoring changes in list of certification schemes accepted under the ASC Feed Standard. |
| Pathway 3 Ingredient Manufacturer assessment | Marine Primary Raw Material | 2024-03-05 | n.a | Social | Ireland | FAO 27 | Investigation of how the supplier (ingredient manufacturer) ensures that child labour and forced labour do not occur. | The Global Slavery Index /forced labour at sea. | Through supplier approval policy, health and safety at work is ensured for ships. Vessels are checked for registration on the EU fleet list and to ensure that no violations of modern slavery, crew health and welfare, or labour rights are recorded. The vessel owner must declare that it has followed all steps to eradicate every aspect of modern slavery. Improvement in the Global Slavery Index Score for Ireland, which now indicates low risk. | Monitoring of suppliers procedures and changes in list of certification schemes accepted under the ASC Feed Standard. |

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| | | 2025-04-20 | n.a | | Latvia | FAO 27 | Investigation of how the supplier (ingredient manufacturer) ensures that child labour and forced labour do not occur. | | The manufacturer's social policy, describes their principles towards social risks and comply with the Constitution Dra Law of the Republic of Latvia (Fundamental Human Rights) Latvijas Republikas Satversme. The policy is to ensure equal treatment for all employees and prevent child and forced labour. On a regular basis, the implementation of the principles is reviewed to control compliance. To make sure that their suppliers follow the same principles, all suppliers must confirm compliance with the Labor Law of the Republic of Latvia. Hereunder confirm that child and forced labour is not allowed. All companies in Latvia are supervised by the State Labour Inspectorate- Republic of Latvia. Hereunder also vessels to secure | *Ongoing monitoring of social commitment and Latvian regulation. *Monitoring changes in list of certification schemes accepted under the ASC Feed Standard. |
| Pathway 3 Ingredient Manufacturer assessment | Marine Primary Raw Material | | | Social | | | | | | |
| | | 2024-09-01 | n.a. | | Norway | FAO 27 | Investigation of how the supplier (ingredient manufacturer) ensures that child labour and forced labour do not occur. | NORIMA - Norwegian Fisheries socially sustainable – including fleets and industry - Norfima Our Shared Seas Report - Unsustainable Fishing and Farming (Ocean Threats) - Our Shared Seas Global Slavery Index - Prevalence & Number The Global Slavery Index (walkfree.org) | Suppliers have supplied statements referencing the Norwegian law and have supplied statements pertaining to areas where vessels are regulated in line with the ILO 188 work in fishing convention and supporting information on the checks applied to vessels and crew. The requirements of the Norwegian Transparency Act mean that larger companies in Norway must report on their due diligence efforts to ensure human rights and decent working conditions in their supply chains of their business. Norway is rated as a country with LOW risk of modern slavery in the fishing industry | *Monitor Norwegian Transparency Act reporting on annual basis and follow up with suppliers *A Social Risk Assessment must be completed on all vessels supplying whole fish under the MarinTrust Standard V3. Therefore further due diligence procedures on social risk will become embedded as a requirement of the standard. *Monitoring changes in list of certification schemes accepted under the ASC Feed Standard. |
| Pathway 3 Ingredient Manufacturer assessment | Marine Primary Raw Material | | | Social | | | | | | |
| | | 2024-11-01 | Guar | | India | | Regulatory oversight. | Land under cultivation Agricultural-Statistics-at-a-Glance-2021-English-version.pdf (desagri.gov.in) India - Context and Land Governance Land Portal | According to Govt of India Agricultural statistics , the area of land under cultivation for guar has been decreasing since 2015. This is due to a shift away from guar derivatives for the fraking supply market and variable yields due to variations in rainfall. Therefore, it is unlikely that guar farming is a driver of agricultural expansion where land ownership violations occur for illegal expansion of agriculture. Land fragmentation - where land is divided to the next generation is a long-standing challenge in agriculture, highlighting the small holder nature of this system, and constrains farmers' ability to scale up efficiently. Whilst a check of Rajasthan, Gujarat and Haryana states through Land Conflict Watch | *Work with all guar suppliers to develop improvements to traceability *Suppliers have been audited in 2024. *Request evidence that our suppliers have audited their upstream suppliers for compliance with Code of Conduct |
| Pathway 3 Ingredient Manufacturer assessment | Plant Primary Raw Material | | | Legal | | | | | | |
| | | 2024-11-01 | Guar | | India | | The Govt of India have several policies in place aiming to improve the lives of agricultural labourers and the rural poor, however eradicating bonded or child labour in rural settings is a complex issue against the background of high levels of poverty particularly amongst scheduled caste landless labourers, which make them more vulnerable to bonded labour and for children to be engaged in work. | 2022ListoGoodsExcel (2).xlsx There is a goal set by Govt of India to see all children in India accessing free education and the Govt of India is working closely with organisations such as UNICEF to deliver this goal. Improving the educational enrolment and retention of children from the most disadvantaged groups in rural India such as scheduled castes and girls, is a complex issue. Labour in the agriculture sector can present a risk of child and/or bonded labour. Online searches do not indicate that such labour issues characterise the guar production sector specifically, and appears to be more prevalent in cotton production, brick making and other industries. | *Work with all guar suppliers to develop improvements to traceability *Suppliers have been audited in 2024. *Request evidence that our suppliers have audited their upstream suppliers for compliance with Code of Conduct | |
| Pathway 3 Ingredient Manufacturer assessment | Plant Primary Raw Material | | | Social | | | | | | |
| | | 2024-11-01 | Guar | | India | | Increasing land for guar cultivation. | Interactive World Forest Map & Tree Cover Change Data GFW (globalforestwatch.org) | Global Forest Watch mapping shows no tree cover in the guar production areas. The area of land under guar cultivation has been decreasing over the past 10 years. Therefore, we conclude there is a low risk that guar contributes to illegal deforestation. | *Work with all guar suppliers to develop improvements to traceability *Suppliers have been audited in 2024. *Request evidence that our suppliers have audited their upstream suppliers for compliance with Code of Conduct |
| Pathway 3 Ingredient Manufacturer assessment | Plant Primary Raw Material | | | Environmental | | | | | | |

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| Pathway 3 Ingredient Manufacturer assessment | Plant Primary Raw Material | 2025-04-19 | Horse beans | Legal | Latvia | | Poor regulatory oversight resulting in systematic violations of land use or environmental laws and regulation within the plant-based primary raw material production. | | The supplier require that their suppliers have management systems in place, appropriate to their business, to manage compliance with the Supplier Code of Conduct. This should include clear management accountabilities, policies and due diligence procedures, training, communication, and review procedures to ensure compliance and continuous improvement. The supplier will continuously carry out assessments of suppliers and reserves the right to audit any of its supplier's and their sub-contractor's compliance. During assessments they expect their suppliers to be cooperative and provide access to performance data, workers, and production facilities. If any non-compliances are | *Ongoing DD on traceability and follow up on supplier policies and procedures. *Monitoring changes in ASC Country Risk Scorecard |
| Pathway 3 Ingredient Manufacturer assessment | Plant Primary Raw Material | 2025-04-19 | Horse beans | Social | Latvia | | Child labour and Forced/Bonded labour. | | The suppliers Code of Conduct towards social risks are derived from the International Labour Organisation's fundamental principles and rights at work, the UN guiding principles on business and human rights, the UN convention of the rights of the child, the children's rights and business principles and other applicable UN and ILO conventions. Suppliers are to support and respect internationally declared human rights and treat its employees fairly, equally and with respect. All forms of Child labour and forced labour is prohibited. The supplier has implemented a whistleblower scheme, where suspicions or knowledge of serious matters can be reported. | *Ongoing DD on traceability and follow up on supplier policies and procedures. *Monitoring changes in ASC Country Risk Scorecard |
| Pathway 3 Ingredient Manufacturer assessment | Plant Primary Raw Material | 2025-04-19 | Horse beans | Environmental | Latvia | | Illegal/Legal deforestation/conversion. | | The suppliers Code of Conduct is based on the principles set out in the UN Global Compact and the sustainable development goals as well as other applicable laws and industry standards. According to their Supplier Code of Conduct, the suppliers shall assess significant environmental impact of operations and establish and follow procedures that reflect their environmental responsibility. Hereunder commit to address climate change by investing in renewable energy and reducing our own emissions, in the same way as the supplier. | *Ongoing DD on traceability and follow up on supplier policies and procedures. *Monitoring changes in ASC Country Risk Scorecard |
| Pathway 3 Ingredient Manufacturer assessment | Plant Primary Raw Material | 2025-04-20 | Canola/Rapeseed (Brassica napus L) | Legal | Latvia | | Poor regulatory oversight resulting in systematic violations of land use or environmental laws and regulation within the plant-based primary raw material production. | | According to the supplier, their suppliers must comply with national and international legislation. It is a requirement that all their suppliers sign their Supplier Code of Conduct. In doing so, they commit to comply with the requirements described in the Supplier Code of Conduct and bring these requirements forward in their own value chain. If suppliers do not uphold these requirements set in the Supplier Code Conduct, the supplier will terminate the business cooperation. Audits are performed to check compliance with their principles in their Supplier Code of Conduct. | *Ongoing DD on traceability and follow up on supplier policies and procedures. *Monitoring changes in ASC Country Risk Scorecard. |

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| Pathway 3 Ingredient Manufacturer assessment | Plant Primary Raw Material | 2025-04-20 | Canola/Rapeseed (Brassica napus L.) | Social | Latvia | | Child labour and Forced/Bonded labour. | | According to the suppliers Code of Conduct, suppliers must support and respect international human rights: civil, political, economic, social and cultural rights. In the event of direct or indirect violations of human rights, these must be stopped as soon as the supplier becomes aware of it. Forced labour and child labour is not accepted. To avoid violations of human rights, FN has adopted the UN Guiding Principles on Business and Human Rights, which specifically describe what companies must do. FN requires that: •The company identifies where there is a risk that has a negative impact on human rights. The entire value chain must be included in this risk analysis. •The company prevents the | *Ongoing DD on traceability and follow up on supplier policies and procedures. *Monitoring changes in ASC Country Risk Scorecard. |
| Pathway 3 Ingredient Manufacturer assessment | Plant Primary Raw Material | 2025-04-20 | Canola/Rapeseed (Brassica napus L.) | Environmental | Latvia | | Illegal/Legal deforestation/conversion. | | According to the suppliers Code of Conduct, suppliers must comply with the United Nations Conference on Environment and Development (UNCED). They must work systematically to prevent, minimize and remedy negative impacts on the environment from its activities. In case of uncertainty about environmental consequences, the supplier must follow a precautionary principle. The supplier expects their suppliers to work to reduce their CO2 emissions and set ambitious CO2 reduction targets. The supplier is also expected to focus on other environmental improvements in the ongoing operation of its business, for example by working with biodiversity and reducing energy consumption, water consumption, pollution and | *Ongoing DD on traceability and follow up on supplier policies and procedures. *Monitoring changes in ASC Country Risk Scorecard. |
| Pathway 3 Ingredient Manufacturer assessment | Plant Primary Raw Material | 2025-04-18 | Wheat (Triticum aestivum) | Legal | Bulgaria | | Poor regulatory oversight resulting in systematic violations of land use or environmental laws and regulation within the plant-based primary raw material production. | | Due Diligence is performed by the suppliers to secure that their primary raw material does not originate from areas affected by poor regulatory oversight resulting in systematic violations of land use or environmental laws and regulation within the plant-based primary raw material production. | *Ongoing DD on traceability and follow up on supplier policies and procedures. *Monitoring changes in ASC Country Risk Scorecard. |
| Pathway 3 Ingredient Manufacturer assessment | Plant Primary Raw Material | 2025-04-18 | Wheat (Triticum aestivum) | Social | Bulgaria | | Child labour and Forced/Bonded labour. | | Due Diligence is performed by the suppliers to secure that their primary raw material is not produced using forced labour or worst forms of child labour. Grievance Mechanism is implemented. | *Ongoing DD on traceability and follow up on supplier policies and procedures. *Monitoring changes in ASC Country Risk Scorecard |
| Pathway 3 Ingredient Manufacturer assessment | Plant Primary Raw Material | 2025-04-18 | Wheat (Triticum aestivum) | Environmental | Bulgaria | | Illegal/Legal Poor regulatory oversight resulting in systematic violations of land use or environmental laws and regulation within the plant-based primary raw material production. | | Due Diligence is performed by the suppliers to secure that their primary raw material does not originate from areas affected by poor regulatory oversight resulting in systematic violations of land use or environmental laws and regulation within the plant-based primary raw material production. | *Ongoing DD on traceability and follow up on supplier policies and procedures.*Monitoring changes in ASC Country Risk Scorecard. |
| Pathway 3 Ingredient Manufacturer assessment | Plant Primary Raw Material | 2025-04-18 | Wheat (Triticum aestivum) | Legal | Croatia | | Illegal/Legal Poor regulatory oversight resulting in systematic violations of land use or environmental laws and regulation within the plant-based primary raw material production. | | Due Diligence is performed by the suppliers to secure that their primary raw material does not originate from areas affected by poor regulatory oversight resulting in systematic violations of land use or environmental laws and regulation within the plant-based primary raw material production. | *Ongoing DD on traceability and follow up on supplier policies and procedures.*Monitoring changes in ASC Country Risk Scorecard |
| Pathway 3 Ingredient Manufacturer assessment | Plant Primary Raw Material | 2025-04-18 | Wheat (Triticum aestivum) | Social | Croatia | | Child labour and Forced/Bonded labour. | | Due Diligence is performed by the suppliers to secure that their primary raw material is not produced using forced labour or worst forms of child labour. Grievance Mechanism is implemented. | *Ongoing DD on traceability and follow up on supplier policies and procedures.*Monitoring changes in ASC Country Risk Scorecard |
| Pathway 3 Ingredient Manufacturer assessment | Plant Primary Raw Material | 2025-04-18 | Wheat (Triticum aestivum) | Environmental | Croatia | | Illegal/Legal deforestation/conversion. | | Due Diligence is performed by the suppliers to secure that their primary raw material originates from areas resulted from illegal deforestation/conversion. | *Ongoing DD on traceability and follow up on supplier policies and procedures.*Monitoring changes in ASC Country Risk Scorecard |
| Pathway 3 Ingredient Manufacturer assessment | Plant Primary Raw Material | 2025-04-18 | Wheat (Triticum aestivum) | Legal | Czech Republic | | Poor regulatory oversight resulting in systematic violations of land use or environmental laws and regulation within the plant-based primary raw material production. | | Due Diligence is performed by the suppliers to secure that their primary raw material does not originate from areas affected by poor regulatory oversight resulting in systematic violations of land use or environmental laws and regulation within the plant-based primary raw material production. | *Ongoing DD on traceability and follow up on supplier policies and procedures.*Monitoring changes in ASC Country Risk Scorecard. |
| Pathway 3 Ingredient Manufacturer assessment | Plant Primary Raw Material | 2025-04-18 | Wheat (Triticum aestivum) | Social | Czech Republic | | Child labour and Forced/Bonded labour. | | Due Diligence is performed by the suppliers to secure that their primary raw material is not produced using forced labour or worst forms of child labour. Grievance Mechanism is implemented. | *Ongoing DD on traceability and follow up on supplier policies and procedures.*Monitoring changes in ASC Country Risk Scorecard |

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