Fishing Industry Association of Papua New Guinea (FIA PNG)
FIA PNG Modern Slavery Statement

1. Background

FIA PNG is one of the largest integrated tuna commercial fishing companies. You can find our tuna in some of the world's leading retailers. Everything we do and catch is driven by our commitment to quality, food safety, and sustainability.

Our Responsible Sourcing Policy (RSP) initiative guides our long-term strategies, and our tuna fleet members recently invested in third-party certification programs to recognise our best practices across our RSP sustainability pillars.

We collaborate with a range of stakeholders in the fishing industry, including global fishing industry coalitions, inter-governmental agencies, and NGOs on a range of topics including crew decent living and working conditions policy development, ghost fishing gear mitigation, best practice fisheries management, science to support fisheries management, and environmental and compliance issues.

FIA PNG accepts the challenge to eradicate modern slavery practices in all forms within the PNG region and fishing operation grounds; with commitment and rigor we have decided to preserve the health of our oceans and the environment.

1.1 Modern Slavery Risk

FIA PNG has taken steps to assess, recognize, mitigate and manage modern slavery risk by identifying human rights risks, including forced labour, in our tuna processing factories and our tuna fleet through mapping and risk analysis.

We have developed and implemented a Responsible Sourcing Policy – RSP that also includes commitments toward eradicating modern slavery at the Sea. We have shared our policy with our partners, and it is published on our website.

We conducted a fishing operation risk analysis in our fleet to identify any potential risk for certain activities. A management system has been set up with internal audits, second-party audits and third-party certification audits to ensure continuous monitoring of our Crew welfare onboard; also, our workers at the tuna processing factories have implemented it even before our tuna fleet.

Understanding the specific risk in our own tuna processing and fishing operation will enable us to implement targeted actions to mitigate and manage any modern slavery based on the level of risk we have identified.

Modern slavery in fisheries: It is a complex issue. Fishermen may be lured into situations of modern slavery by seemingly legitimate employment opportunities, but once recruited, are unable to leave due to the threat of violence against themselves or family members, physical confinement on land and sea, the withholding of wages, and the debts they incur.

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Social Accountability and Human Rights Journey in the FIA PNG tuna supply chain

In **2012**, Fishing Forum Agency FFA assigned Seafoodmatter to carry out a Social Accountability Assessment based on SA8000 to our tuna processing factory's members located on Papua New Guinea and also in the Marshall Islands.

In **2013**, FFA also requested Seafoodmatter to follow up the level of implementation of the SA8000 assessment recommendation.

Since **2014,** Our tuna processing factories obtained a third-party certification or social accountability agreement: BSCI, SEDEX/SMETA

In **2017**, FIA PNG decided to embark on the MSC tuna fishery certification of the Papua New Guinean waters which also involved the creation of a broader policy called Responsible Sourcing Policy - RSP

In **2018**, FIA PNG launched officially the Responsible Sourcing Policy – RSP with their four (4) pillars that include Social Responsibility and Crew Welfare

In **2019**, Seafoodmatter led the Frabelle fishing's Human Rights and Crew welfare assessment that was based on the FIA PNG Responsible Sourcing Policy, Seafoodmatter and FIA PNG office started a due diligence framework development and implementation on the FIA PNG tuna fleet.

In **2020**, a Technical Expert Working Group (TWG) was set up with operational and technical representatives of the FIA PNG tuna fleet to support the development of policy, procedures, and audit tools impacting our fishing operation. They are listed on our website – www.fia-png.com

In **2021**, the RD fishing fleet obtained the Responsible Fishing Vessel Scheme RFVS certification for their tuna fleet

In **2022**, Our Chief Operating Officer joined the **GSA Worker Voice Oversight Committee** and the **F**airness **I**ntegrity **S**afety and **H**ealth (**FISH**) standard for **Crew Steering Oversight Committee** (SOC)

In **2022**, Seafoodmatter and FIA PNG office carried out Internal audits of the Social Responsibility and Crew Welfare in our tuna fleet as part of our RSP policy and also to comply with third-party certification. This is a continuous FIAO annual plan.

Also, FIA PNG tuna fleet opened the Vessel Monitoring System (VMS) to the Global Fishing Watch in almost near real time.

In **2022**, the rest of the FIA PNG tuna fleet expect to obtain the FISH standard for crew certification, having a total of 48 tuna purse seiners (P/S) under two (2) certifications (16 P/S in RFVS, and 32 P/S in FISH) impacting more than 2300 crew members onboard living and working conditions.

In **2025**, our tuna fleet completed the installation of WI-FI onboard, and provide free access to WIFI to more than 1540 crew embarked in 55 tuna purse seiners

In **2026,** seven of our FIA PNG tuna fleet obtained individually the FISH standard for Crew certification in a total of 47 tuna purse seiners, impacting 1786 Crew in total.

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The Global Slavery Index has identified the risk factors for modern slavery in the fishing industry. Together with researchers from Sea Around Us , at the University of Western

Australia and the University of British Columbia, Walk free sought to determine a set of risk factors that are associated with modern slavery in fisheries at a global level. In the absence of local reporting, these risk factors enable to identify likely areas of national risk.

The occurrence of modern slavery in major producing countries is associated with the following six factors

1. Fishing outside of the vessel's national waters (officially known as Exclusive Economic Zones or EEZs) where industry may be subject to fewer regulations.
2. A dependence on distant water fishing. Distant water fishing potentially increases the vulnerability of the crew to exploitation because of the remote fishing locations where vessels often remain for extended periods of time, limiting the ability for monitoring/oversight by authorities.
3. High levels of vessel and fuel subsidies provided by the national government. High subsidies indicate a lack of competitiveness in a country's fishing industry and suggest likely pressure to cut costs.
4. Relatively low per capita GDP of the fishing country. This may reflect limited governmental capacity to monitor fleets and enforce fisheries standards and legislation and/or an increased likelihood that potential workers on fishing fleets are seeking work in an environment of limited economic opportunities.
5. Low average value of a fishery's catch per fisher. Low productivity fisheries have a more pressing need to reduce labour costs, as these are one of the few remaining costs that are not externally fixed.
6. Large scale unreported fishing by a country's fishing fleets. This represents weak fisheries governance and a lack of legal oversight. Illegal fishing, a major component of unreported fishing, causes billions of dollars in losses to economies around the world each year, and poorly managed fisheries are lawless markets.

We have identified the risk of the following five salient human rights risks in our operations and value chains:

1. Forced labor
2. Bonded labor arising from excessive recruitment fees
3. Lack of a worker voice
4. Child labor
5. Unsafe working conditions

More details of our Social Responsibility & Crew Welfare procedure, FIA PNG tuna fleet internal audit results and Crew welfare certification are published on our website (resources).

2. RSP Policy, Social Responsibility and Crew Welfare procedure (SR&CW) and audit tool that includes modern slavery and human rights indicators.

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Launched in 2018 and implemented in 2020, the FIA PNG RSP content is a pillar of SR&CW that assesses crew welfare, human rights, and working conditions onboard our

fishing vessels. This has a direct impact on more than 1540 crew members onboard our tuna fleet

Currently the 100% of our tuna fleet have been assessed and audited (Internal audits, second party audit and/or third party audit) and by 2024 all our Crew members have received and signed an RSP SR&CW pre-embarking or induction training based on FISH standard requirements. FIA PNG members are responsible for carrying on, and records should be kept for 3 years.

We work and report to the National Fishery Authority NFA of PNG, our competent authority to control port state measures to eliminate Illegal, Unreported and Unregulated (IUU) tuna from our tuna supply chain. In FIA PNG, we have a robust and comprehensive traceability system (iFIMS) to cross-reference from vessels to processors to export, which is almost real-time reporting

2.1 Monitoring and oversight measures addressing Modern Slavery and Unethical Labour Practices within our tuna supply chain

FIA PNG have implemented and maintained a comprehensive and rigorous process to assess and monitor compliance of our members and screen and approve potential new fishing vessels in our FIA PNG group and our RSP initiative.

The screening and approval process is described in detailed in our FIA PNG Internal audit procedure v1.0 (see in our website), and it is required before new fishing vessels are added to our initiative. Our FIA PNG SR&HR annual audit plan include at least 2 times per year audits onboard different fleet and vessels.

Our FIA PNG SR&CW at Sea procedure and audit tool include the evaluation of the following principles:

Principle 1: Social Responsible Labor Practices and Ethical Behaviors
Principle 2: Fair Conditions of Service for All Fisheries
Principle 3: Ensure the Safety and Health of All Fishers
Principle 4: Provide Decent Accommodations, Water, and Food
Principle 5: Worker voice

A 24/7 electronic system is monitoring each of our fishing vessels in our PNG EEZ, PNG AW and also any PNA EEZ and WCPFC water. The NFA is fully responsible

for managing and overseeing the Vessel Monitoring System (VMS) to track the legality of the fishing operation in the assigned fishing grounds.

3. Responsibility of FIA Office

The FIAO will ensure the full implementation of this FIA PNG modern slavery statement by the participants in the FIA PNG MSC scheme in accordance with the FIA policy & procedures, and Global Slavery Index recommendations. A FFA Good Standing certification, not IUU-listed in the last 5 years, and a fishing license are prerequisites for the annual audit of the modern slavery act of FIA PNG

The FIAO will audit on an annual basis FIA fishing company members and fishing vessels. The fishing vessel will be randomly audited against the FIA PNG modern slavery statement policy. The outcomes will be shared with the FIA fishing company and the FIAO management. FIA PNG members shall provide access to documented evidence for traceability and reporting onboard.

Tuna processors' factories are annually audited either by a third-party certification auditor team or a second-party audit coming from their clients; the FIAO does not want to increase audit effort for land-based members who are already under constant monitoring by stakeholders.

3.1 **Failure to comply**

Request for explanation or remedial action

3.1.1 If FIA PNG office (FIAO) ~~is found and verified~~ verifies that a fishing vessel or a fishing company member has failed to comply with a requirement under this FIA PNG modern slavery act (which deal with requirements to give modern slavery statements), the FIAO may give a written request to the fishing company to do either or both of the following:

a. Provide an explanation for the failure to comply within a specified period of 28 days or longer after the request is given;
b. Undertake specified remedial action in relation to that requirement in accordance with the request within a specified period of 28 days or longer after the request is given.
c. FIAO shall be satisfied with the remediation proposed and monitor the compliance of the fishing company or fishing vessel

3.1.2 If a FIA PNG fleet member ***fails to comply*** with a request, if, and only if:

a. No explanation is given in response to the request within the period specified in the request under 3.1.1.a, or
b. No remedial action is undertaken in response to the request within the period specified in the request under paragraph 3.1.1.b

3.1.3 If a FIA PNG fleet member follows 3.1.2, FIAO will extend a suspension notice and will remove the fleet or fishing vessel from the FIA PNG RSP and FIA PNG initiative within 5 working days of a written notice.

3.2 **Annual report**

FIAO includes in their annual report the FIA PNG members performance of each RSP pillar, specifically for modern slavery matters and for Social Responsibility & Crew Welfare

indicators, FIAO will also include audit results and percentage (%) of performance per company based on the audits carried out by FIAO annually.

4 Recording and 100% observer coverage onboard

Our tuna fleet is under the monitoring of the National Fishery Authority (NFA), which places observers onboard to supervise each FIA PNG MSC trip. Observers are fully responsible for recording, and reporting activities onboard our fleet and direct reporting to the NFA, including IUU.

5 History of Revision

Revision No	Date	Reasons/Details
0.1	June 2022	Creation of the modern slavery statement by FIA PNG Sustainability Director
0.2	04th September 2022	Full document review by FIA PNG TWG
1.0	20 October	Full document review, M. Hidalgo

This statement has been prepared by the FIA PNG office to comply with our obligations under the ***Modern Slavery Act 2015 (UK)*** and has been approved by the FIA PNG Board of Directors.