SMETA Corrective Action Plan Report (CAPR)

Version 6.1

Audit Content:

(1) A SMETA audit was conducted which included some or all of Labour Standards, Health & Safety, Environment and Business Ethics. The SMETA Best Practice Version 6.1 (March 2019) was applied. The scope of workers included all types at the site e.g. direct employees, agency workers, workers employed by service providers and workers provided by other contractors. Any deviations from the SMETA Methodology are stated (with reasons for deviation) in the SMETA Declaration.

(2) The audit scope was against the following reference documents

2-Pillar SMETA Audit

- ETI Base Code
- SMETA Additions
  - Universal rights covering UNGP
  - Management systems and code implementation,
  - Responsible Recruitment
  - Entitlement to Work & Immigration,
  - Sub-Contracting and Home working,

4-Pillar SMETA

- 2-Pillar requirements plus
- Additional Pillar assessment of Environment
- Additional Pillar assessment of Business Ethics
- The Customer's Supplier Code (Appendix 1)

(3) Where appropriate non-compliances were raised against the ETI code / SMETA Additions & local law and recorded as non-compliances on both the audit report, CAPR and on Sedex.

(4) Any Non-Compliance against customer code shall not be uploaded to Sedex. However, in the CAPR these 'Variances in compliance between ETI code / SMETA Additions/ local law and customer code' shall be noted in the observations section of the CAPR.

Guidance

The Corrective Action Plan Report summarises the site audit findings and a corrective, and preventative action plan that both the auditor and the site manager believe is reasonable to ensure conformity with the ETI Base Code, Local Laws and additional audited requirements. After the initial audit, the form is used to re-record actions taken and to categorise the status of the non-compliances.

N.B. observations and good practice examples should be pointed out at the closing meeting as well as discussing non-compliances and corrective actions.

To ensure that good practice examples are highlighted to the supplier and to give a more 'balanced' audit a section to record these has been provided on the CAPR document (see following pages) which will remain with the supplier. They will be further confirmed on receipt of the audit report.

Root cause (see column 4)

Root cause refers to the specific procedure or lack of procedure which caused the issue to arise. Before a corrective action can sustainably rectify the situation, it is important to find out the real cause of the non-compliance and whether a system change is necessary to ensure the issue will not arise again in the future.

See SMETA BPG Chapter 7 'Audit Execution' for more explanation of "root cause".

Next Steps:

1. The site shall request, via Sedex, that the audit body upload the audit report, non-compliances, observations and good examples. If you have not already received instructions on how to do this then please visit the web site www.sedexglobal.com.
2. Sites shall action its non-compliances and document its progress via Sedex.
3. Once the site has effectively progressed through its actions then it shall request via Sedex that the audit body verify its actions. Please visit www.sedexglobal.com web site for information on how to do this.
4. The audit body shall verify corrective actions taken by the site by either a "Desk-Top" review process via Sedex or by Follow-up Audit (see point 5).
5. Some non-compliances that cannot be closed off by "Desk-Top" review may need to be closed off via a "1 Day Follow Up Audit" charged at normal fee rates. If this is the case, then the site will be notified after its submission of documentary evidence relating to that non-compliance. Any follow-up audit must take place within twelve months of the initial audit and the information from the initial audit must be available for sign off of corrective action.
6. For changes to wages and hours to be correctly verified it will normally require a follow up site visit. Auditors will generally require to see a minimum of two months wages and hours records, showing new rates in order to confirm changes (note some clients may ask for a longer period, if in doubt please check with the client).

Audit Details			
Sedex Company Reference: *(only available on Sedex System)*	ZC412321854	Sedex Site Reference: *(only available on Sedex System)*	ZS413888955
Business name (Company name):	THAI UNION INGREDIENTS COMPANY LIMITED		
Site name:	Thai Union Ingredients Company limited		
Site address:	30/24 , Moo 8, Rama 2 Road, Tarsrai Sub-district, Mueang Samut Sakhon District Samutsakorn 74000 TH	Country:	TH
Site contact and job title:	Ms. Prontip Saetia / Factory Manager		
Site phone:	66 (0) 3445 8600 -3226	Site e-mail:	Parada.Suttiwong@thaiunion.com

SMETA Audit Pillars:	☑ Labour Standards	☑ Health and Safety (plus Environment 2-Pillar)	☐ Environment 4-pillar	☐ Business Ethics
Date of Audit:	2024-06-11			

Audit Company Name:
SGS Thailand

Audit Conducted By					
Affiliate Audit Company	☑	Purchaser	☐	Retailer	☐
Brand owner	☐	NGO	☐	Trade Union	☐
Multi-stakeholder	☐	Combined Audit (select all that apply)			

Audit Parameters			
Time in and time out	Day 1		
	In	09:00	
	Out	18:00	
Audit type:	PERIODIC		
Was the audit announced?	ANNOUNCED		
Was the Sedex SAQ available for review?	Yes		
Any conflicting information SAQ/Pre-Audit Info to Audit findings?	No		
Who signed and agreed CAPR	Ms. Prontip Saetia / Factory Manager		
Is further information available	No		

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	Yes	Yes	No
B: Present at the audit?	Yes	Yes	No
C: Present at the closing meeting?	Yes	Yes	No
Reason for absence at the opening meeting	There is no union in this factory however, the factory established welfare committee as local law defined.		
Reason for absence during the audit	There is no union in this factory however, the factory established welfare committee as local law defined.		
Reason for absence at the closing meeting	There is no union in this factory however, the factory established welfare committee as local law defined.		

Summary of Findings

Issue *(please click on the issue title to go direct to the appropriate audit results by clause)*	Area of Non–Conformity		Number of issues			Findings
	ETI	Local Law	NC	Obs	GE	
0B - Management systems and code implementation			0	0	1	GE - 0c4f5e5b-5230-44a7-b6e7-ee1524edc297
5 - Living wages are paid			0	0	1	GE - 58b96961-e3b3-4f25-b589-b82c17b4c773

Corrective Action Plan - Good Examples

Good Example	Evidence

[Back to findings summary]

Good Example	
Status	OPEN
Reference	0c4f5e5b-5230-44a7-b6e7-ee1524edc297
Clause	0B - Management systems and code implementation
Issue Title	35 - Presence of relevant certifications certification that address labour rights / human rights, environmental impact or corruption (OHSAS 18001, ISO 14001, ISO 50001, ISO 37001, SA8000 etc.)
Subcategory	Site's licenses & Certifications
New or carried over?	☑ New ☐ Carried Over
Explanation to the good example	•Food Safety System Certificate 22000 (Version 5) by TUV NORD, Certificate no. 44 295 182463 valid until 02/06/2025. •GHPs Certificate by TUV NORD, Certificate no. TH/GM 240029 valid until 28/03/2027. •HACCP Certificate by by TUV NORD, Certificate no. TH/HA 240028 valid until 28/03/2027. •HALAL Certificate CICOT HL: K710/2020 by the Central Islamic Council of Thailand valid until 26/02/2025. •Marin Trust by Global Standard for Responsible Supply of Marine Ingredients Version 2.0 by Global Trust with Certificate no: 197 valid until 13/07/2024. •KOSHER Certificate by Orthodox Union valid until 31/05/2025. •Friend of the Sea (FOS) Certificate by Control Union, Certificate no. C874344FOS-C-01.2024 valid until 17/11/2026.
Evidence	Certificate review and management interview

FOS Certificate - NSF.jpg

Marin trustCertificate - NSF.jpg

Kosher symbol.jpg

Kosher bulk ship.jpg

Halal - Fish oil .jpg

Halal - Collagen.jpg

HACCP Certificate - DLD.jpg

GHPs - DLD.jpg

FSSC22000 Certificate - Protein plant.jpg

	FSSC22000 Certificate - Fish oil plant.jpg

Good Example	Evidence
[Back to findings summary]	

Good Example	
Status	OPEN
Reference	58b96961-e3b3-4f25-b589-b82c17b4c773
Clause	5 - Living wages are paid
Issue Title	429 - Company provides a range of additional benefits, including: free medical care on-site, holiday and other bonuses, free library, food subsidy, free transport
Subcategory	Benefits & Insurance
New or carried over?	☑ New ☐ Carried Over
Explanation to the good example	The factory has provided additional benefits to employee as follows: • Annual Bonus • Diligent Allowance • Allowance in case of Funeral for Worker's Family Member • Medical Allowance • Nightshift Allowance • Wedding Ceremony Allowance • Health Insurance • Life Insurance • Provident Fund
Evidence	Confirmed by worker interview and management interview

SMETA Declaration

I declare that the audit underpinning the following report was conducted in accordance with SMETA Best Practice Guidance and SMETA Measurement Criteria.

(1) Where appropriate non-compliances were raised against the ETI code / SMETA Additions & local law and recorded as non-compliances on both the audit report, CAPR and on Sedex.

(2) Any Non-Compliance against customer code alone shall not be uploaded to Sedex. However, in the CAPR these 'Variances in compliance between ETI code / SMETA Additions/ local law and customer code' shall be noted in the observations section of the CAPR.

Auditor Team			
Lead Auditor:	Thanakit Chaisombat	APSCA Number:	21704910
Additional Auditors:			
Date of declaration:	2024-06-11		

Note: The focus of this ethical audit is on the ETI Base Code and local law. The additional elements will not be audited in such depth or scope, but the audit process will still highlight any specific issues.

Site Representation	
Full Name:	Ms. Prontip Saetia
Title:	Factory Manager
Date of declaration:	2024-06-11
Comments: *Any exceptions to this must be recorded here (e.g. different sample size):* *Sampled wage records from the past 5 months were provided for review (5 months only since the operation for digital thermometer just started last Sep 2020).* *The audit took 2.0 man-days (9AM-6PM per day). Audit time was extended until 8PM due to the extent of documentation; this was agreed upon with the factory representatives*	
Nil	

Guidance on Root Cause

Explanation of the Root Cause Column

If a non-compliance is to be rectified by a corrective action which will also prevent the non-compliance re-occurring, it is necessary to consider whether a system change is required.

Understanding the root cause of the non-compliance is essential if a site is to prevent the issue re-occurring.

The root cause refers to the specific activity/ procedure or lack of activity /procedure which caused the non-compliance to arise. Before a corrective action can rectify the situation, it is important to find out the real cause of the non-compliance and whether a system change is necessary to ensure the issue will not arise again in the future.

Since this is a new addition, it is not a mandatory requirement to complete this column at this time. We hope to encourage auditors and sites to think about Root Causes and where they are able to agree, this column may be used to describe their discussion.

Some examples of finding a "root cause"

Example 1
Where excessive hours have been noted the real reason for these needs to be understood, whether due to production planning, bottle necks in the operation, insufficient training of operators, delays in receiving trims, etc.

Example 2
A non-compliance may be found where workers are not using PPE that has been provided to them. This could be the result of insufficient training for workers to understand the need for its use; a lack of follow-up by supervisors aligned to a proper set of factory rules or the fact that workers feel their productivity (and thus potential earnings) is affected by use of items such as metal gloves.

Example 3
A site uses fines to control unacceptable behaviour of workers.

International standards (and often local laws) may require that workers should not be fined for disciplinary reasons.

It may be difficult to stop fines immediately as the site rules may have been in place for some time, but to prevent the non-compliance re- occurring it will be necessary to make a system change.

The symptom is fines, but the root cause is a management system which may break the law. To prevent the problem re-occurring it will be necessary to make a system change for example the site could consider a system which rewards for good behaviour

Only by understanding the underlying cause can effective corrective actions be taken to ensure continuous compliance.

The site is encouraged to complete this section so as to indicate their understanding of the issues raised and the actions to be taken.

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You can leave feedback by following the appropriate link to our questionnaire:

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http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d

Click here for Supplier (B) members:
http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRglY_2brg_3d_3d

Click here for Auditors:
https://www.surveymonkey.co.uk/r/BRTVCKP