

2023 Report TTIA Good Labour Practice (GLP) Visits, Recruitment Practices and Human Rights Practices



Annual Report 2023 on Monitoring of the Good Labour Practices (GLP)

Data Collection on Recruitment and Human Rights

The Thai Tuna Industry Association (TTIA) and the Thai Pet Food Trade Association (TPFA) produced a summary report on the monitoring of Good Labour Practices (GLP) among their members. The objective was to support members in implementing the GLP, promoting good relations between employers and employees, and assessing the application of GLP and its impact. The initiative also aims to enhance knowledge and understanding of the GLP among new members. Additional data on labour recruitment and human rights aspects were also collected.

Despite the easing of the COVID-19 situation, risks persist in several areas. Therefore, the Association conducted activities both on-site in the Bangkok metropolitan area and online in the outer areas from June 27th to August 25th, 2023. A total of 25 out of 26 member companies participated, all of which were members of the TTIA, and 10 were members of the TPFA. Further details can be found in the table below.

| Associations | Total member companies | Participating companies | Small-sized companies with less than 50 workers | Medium-sized workers with 51-200 workers | Large-sized companies with over 201 workers |
|--|------------------------------|-------------------------|--|---|--|
| Thai Tuna Industry Association-TTIA | 26 | 25 | 0 | 4 | 21 |
| Thai Pet Food Trade Association-TPFA (all of which are members of the TTIA) | 10 | 10 | 0 | 0 | 10 |

Table Categories of member companies based on the number of workers.

Remark: 1. One company that no longer produces tuna products did not participate in the activity but still maintains its membership status.

2. Based on the Small and Medium Enterprises Promotion Act, B.E. 2543 (2000), considering company size based on the number of workers.

Background

The Thai Tuna Industry Association (TTIA) has been actively engaged in the Good Labour Practice (GLP) program since 2013. The initiative is a collaborative effort involving the Department of Labour Protection and Welfare, the Department of Fisheries, the International Labour Organization (ILO), and the Thai Frozen Foods Association (TFFA). The aim is to strengthen labour management practices in the industry through voluntary participation. Subsequently, resolutions passed at the 2/2015 and 1/2016 TTIA meetings approved the implementation of the TTIA GLP Visit to continuously promote and monitor members' continued use of the GLP, in which 23 out of 25 member companies participated.

In 2018, the Association sent officials for training as facilitators in collaboration with the ILO and the TFFA. In 2019, the Association developed the latest version of the GLP manual and checklist to monitor the members' adherence to the GLP. The new GLP Guidelines outline six basic categories in the industry: (1) forced labour; (2) child labour; (3) freedom of association, collective bargaining and workplace cooperation; (4) discrimination (equal employment opportunity and treatment); (5) wages, compensation, and working time; and (6) occupational safety and health and worker welfare and community engagement. Monitoring of members' adherence to these standards commenced in 2020.

In 2019, the Association established the Thai Pet Food Trade Association (TPFA) to support the pet food industry in Thailand with a focus on wet pet food, which is the primary product of the tuna industry. A meeting held on September 9th, 2019, established the Thai Pet Food Trade Association and mandated the use of labour policies similar to those of the TTIA. This included promoting and implementing the Ethical Code of Conduct, in which the TPFA members also participated.

In 2020, due to the growing importance of cross-border labour recruitment issues among customers of the members, the Association started collecting data on <u>international labour recruitment</u> among its members. A checklist was developed based on unofficial recommendations from the International Organization for Migration (IOM). The Association's recruitment standards were established to align with Thai laws and the laws of the source countries.

In 2021, the Association expanded data collection on <u>human rights issues</u> due to the increased importance given by international organizations and business partners. The Association adjusted the checklist based on the Human Rights Due Diligence Handbook of the National Human Rights Commission and received approval during the 1st/2021 Labour Committee meeting.

Additionally, in 2021, the Association provided information for the evaluation of the GLP Program under the Ship to Shore Rights project of the ILO. The ILO provided feedback and recommendations for further improvement. Suggestions included increasing participation from civil society, specifying appropriate timelines for corrective actions in the grievance mechanism, promoting gender balance in welfare committees, and encouraging greater involvement of management. In 2022, the Association made adjustments by adding questions to the checklist and invited the Migrant Working Group (MWG) non-governmental organization to observe the activities based on the members' voluntary participation (8 member companies voluntarily participated, out of which 3 were observed by the NGOs).

In the current year, 2023, despite the easing of the COVID-19 situation, risks persist in several areas. Following the approval from the 1/2023 TTIA Ordinary General Meeting, the Association organized the GLP Visit, recruitment activities, and human rights activities both on-site in the metropolitan area of Bangkok and online in other regions. In total, 25 member companies participated out of 26. As part of the transparency of operation, NGOs were invited to observe the activities based on the voluntary participation of the member companies (9 member companies voluntarily participated, out of which 5 were observed by the NGOs).

The GLP Visit

The Association has guidelines to monitor and verify compliance with the GLP principles under the following steps:

1. On-site Inspection: The Association conducts on-site visits to member companies' production areas and surrounding factory premises to inspect the working environment, living conditions, and safety of workers. The inspection ensures compliance with labour laws, standards of practices, and safety measures outlined in the standard guidelines or mandated by the law. Companies that do not participate in on-site visits must submit relevant documents requested by the Association. These documents include company policies, regulations, sample employment contracts in both Thai and the language of international migrant workers, pay-slips, and photographs of key areas such as canteens, medical rooms, and notice boards.

2. Interviews with representatives of employers and workers: The Association conducts interviews with HR representatives and 5 randomly selected workers, comprising 2 welfare committee members and 3 general workers, from the member companies. If the member company is part of both the TTIA and the TPFA, workers are randomly sampled from both tuna and pet food processing factories. The questions cover various aspects of workers' work life cycle, their opinions, and satisfaction with the company. TTIA and TPFA focuses on giving importance to the Welfare Committee. Because it is a channel representing workers in making complaints, making suggestions, and solving various problems together with employer.

After the completion of the GLP Visit, the Association compiles a report and sends it to the companies. The report highlights feedback from both employers and employees and assessments based on a color code system (white, grey, black). The system evaluates whether the employer has effective management systems and supporting documentation, adheres to labour laws, and implements corrective actions. Regarding employees, it assesses their understanding of their duties, rights, and the functions of the welfare committees in the workplace. This data collection aids in generating the annual GLP report for the Thai tuna and pet food industries.

3. Follow-up for compliance with the labour laws and the GLP: After conducting the GLP Visit and notifying member companies of the results through the GLP Visit report, if any non-compliance issues are identified concerning the labour laws or the GLP principles, the Association sends an action plan that outlines the timeframe for addressing the identified issues, and member companies are required to provide evidence of corrective actions taken back to the Association.

The 2023 TTIA GLP Visit / Recruitment / Human Rights Report is presented in 8 following sections:

Section 1: Overview of the GLP activities.

Section 2: Summary of members' non-compliance concerning the laws or the GLP Guidelines (Tables 1 and 2).

Section 3: Results of interviews with labour representatives regarding their understanding of the work life cycle.

Section 4: The number of workers and welfare committees in the enterprises (Table 3).

Section 5: The ILO's recommendations and feedback from NGOs participating in the GLP Visit.

Section 6: Changes resulting from the GLP Visit to the members from 2016 to 2023 (Table 4).

Section 7: Labour recruitment information (Table 5).

Section 8: Human rights information.

Appendix: Activity photos.

Section 1: Overview of the GLP activities

The overall GLP Visit activities in 2023: There are currently 66,312 workers in the entire industry, comprising 22,643 Thai workers (34%) and 43,669 international migrant workers (66%). The findings can be summarized in 3 parts: 1. Good Labour Practice (GLP); 2. Recruitment; and 3. Human Rights.

1. Good Labour Practice (GLP): 21 out of 26 member companies were able to comply with the Guidelines. One company that no longer produces tuna products but continues to maintain its membership status did not participate in data collection. In addition, 4 companies were unable to fully comply with the guidelines. Examples include the policies that prohibit the employment of workers under 15 years of age, which contradicts the Ministerial Regulation which specifies premises that are not allowed to hire workers under 18 years of age. Some companies issued bathroom cards, limiting the workers' freedom of restroom use when necessary. There was a lack of written employment contracts for workers, and the contracts did not include workers' native languages. It was also found that compensation policies did not cover all legal criteria. There were instances of deductions in pay-slips that did not comply with the Labour Protection Act. Moreover, welfare committee meetings were held only twice a year. These non-compliance issues were already addressed by the 4 companies in 2023.

2. Recruitment: It was found that 14 member companies had incurred recruitment expenses for all workers, covering companies of all sizes. The main reasons include the increased importance given by clients to the labour recruitment process. Moreover, companies that incurred recruitment expenses aimed to motivate international migrant workers to stay with the company longer and aimed to reduce expenses for the workers. When comparing the expenses between 2022 and 2023, the number of companies responsible for labour expenses increased in almost every item. The expenses that changed the most were; 1. expenses incurred in the source country such as passport obtainment fees; and 2. expenses incurred within the country such as visa and work permit fees.

3. Human Rights: All member companies have policies against discrimination based on gender, religion, and nationality. All members have signed the new TTIA Ethical Labour Practice, which covers various aspects of human rights and freedoms workers are entitled to. Additionally, environmental policies and community importance have been added. However, only a few companies have gone beyond setting policies. For example, some companies have established committees to prevent sexual harassment, all of which consist of 7 female members (more than what the law mandates). These committees have the responsibility to handle complaints and assist workers who have been sexually harassed.

Section 2: Summary of members' non-compliance concerning the laws / the GLP Guidelines (Tables 1 and 2)

Summary of workplace standards where members' non-compliance concerning the laws or the GLP can be categorized into 7 areas, where non-compliance with the law was observed in 5 areas: 1. recruitment and employment; 2. child labour; 3. freedom of association; 5. wages, compensation, and working time, and non-compliance with GLP guidelines was identified in 3 areas: 3. freedom of association, collective bargaining and workplace cooperation; 5. wages, compensation, and working time; and (6) occupational safety and health and worker welfare, as shown in **Table 1.**

Table 1: Summary of members' non-compliance with the laws or the GLP Guidelines and corrective actions

| | | Non- | Non- | Correctiv | e actions |
|-----|--|---|--|----------------------|----------------------------|
| No. | GLP Guidelines | compliance with the laws (issues) | compliance with the GLP (issues) | Resolved (issues) | In progress (Issues) |
| 1 | Recruitment and employment (3 issues) | 1 | 2 | 3 | 0 |
| 2 | Child labour (1 issue) | 1 | 0 | 1 | 0 |
| 3 | Freedom of association, collective bargaining and workplace cooperation (2 issues) | 1 | 1 | 2 | 0 |
| 4 | Discrimination (equal employment opportunity and treatment) (1 issue) | 0 | 1 | 1 | 0 |
| 5 | Wages, compensation, and working time (1 issue) | 1 | 0 | 1 | 0 |
| 6 | Occupational safety and health and worker welfare (0 issue) | 0 | 0 | 0 | 0 |
| | Total | 4 | 4 | 8 | 0 |

Details of members' non-compliance with the law or the GLP Guidelines and the corrective actions or relevant laws in the topics include: 1. Recruitment and employment (3 issues); 2. Child Labour (1 issue); 3. Freedom of association, collective bargaining and workplace cooperation (2 issues); 4. Discrimination (equal employment opportunity and treatment) (1 issue); 5. Wages, compensation, and working time (1 issue); and 6. Occupational safety and health and worker welfare, as shown in **Table 2.**

Table 2: Details of members' non-compliance with the laws or the GLP Guidelines and corrective actions

| Non-compliance with the laws | | Non-compliance with the GLP | Corrective actions | Relevant laws |
|---|---|--|---|---------------|
| 1. Recruitment and employment (3 issues) | The company did not provide employment contracts for workers, and the contracts were not in workers' languages. The company had given an agency the authority to keep the contracts. | | The HR department coordinated with the agency to send employment contracts to the company's office. The original contracts were given to the employees to keep. | |
| | | The company had various policies which had not been translated into the languages of migrant workers. | The company has prepared policies in two languages: Thai and Myanmar. The policies have been posted on notice | |

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| Topics | Non-compliance with the laws | Non-compliance with the GLP | Corrective actions | Relevant laws |
|---|--|--------------------------------|---|--|
| | | | boards for Myanmar workers. | |
| | The company's regulations concerning the compensation for termination did not cover the termination of an employee who has completed 20 years of service, where the employer is required to pay compensation equivalent to 400 days' wages at the final rate of pay. | | The company has modified its regulations by adding details about compensation for termination, aligning them with the laws. | Labour Protection Act (No.7) B.E. 2562 (2019), Sections 118 and 17/1 |
| 2. Child Labour (1 issue) | The company's policy did not allow the employment of workers under the age of 15, which did not follow the law prohibiting employment of those under 18 years old. *The company did not employ individuals under 18 years old. Only the regulation regarding the age needed to be modified. | | The company has modified its regulation to comply with the laws. | the Ministerial Regulation which specifies premises that are not allowed to hire workers under 18 years of age |
| 3. Freedom of association, collective bargaining and workplace cooperation (2 issues) | The company did not organize its welfare committee meeting for at least once in every three months. | | The company has issued a meeting announcement to comply with the law. | Labour Protection Act B.E. 2541, Section 96 |

| Topics | Non-compliance | Non-compliance | Corrective actions | Relevant laws |
|---|---|--|---|--|
| Topics | with the laws | with the GLP | | Relevant laws |
| | | The company issued restroom access cards, restricting the freedom of workers to use the restroom in necessary situations. | The company has modified its regulation to comply with the GLP. | |
| 4. Discrimination (equal employment opportunity and treatment) (1 issue) | | The company conducted pregnancy tests before employment due to past incidents where workers were unaware of their pregnancy, leading to miscarriages during work. | The practice was discontinued. | |
| 5. Wages, compensation, and working time (1 issue) | The company did not deduct any other fees from employees' wages. However, the pay- slip form indicated topics regarding deduction information, such as for absenteeism and tardiness. | | The company has corrected the information in the pay-slip form, with no deductions other than those required by law. | Labour Protection Act BE 2541 (1998), Section 76, prohibits employers from deducting wages, overtime pay, holiday work pays, and overtime on holidays unless it is for income tax or other obligations. |
| 6. Occupational safety and health and worker welfare (0 issue) | | | | - |

Section 3: Results of interviews with worker representatives regarding their understanding of the work life cycles.

From the results of self-assessment questionnaires and interviews with workers, it was found that the randomly sampled group all had a high level of knowledge and understanding in the three following areas: 1) wages, compensation, and working time; 2) recruitment and employment; and 3) occupational safety and health and worker welfare and community engagement.

1) Wages, compensation, and working time: Workers demonstrated profound knowledge and understanding regarding wage rates, calculations of working time, punctual payment, and no deductions other than those required by law. Additionally, they were aware of holiday regulations, such as sick leave, annual

leave, and personal leave, acquired through orientation, employee manuals, and company rules and regulations handbooks.

2) Recruitment and employment: Workers maintained personal documents, such as passports, and understood the terms of employment related to job roles, minimum wage rates, and basic benefits to which they were entitled. This understanding was derived from explanations during job interviews and orientation sessions.

3)Occupational safety and health and worker welfare and community engagement: Workers were provided with appropriate work equipment and the work environment within the factory premises adhered to occupational safety and health standards. However, some workers lacked safety awareness. For instance, in areas with loud noises, it is essential to wear ear protection, but some workers do not use earplugs.

Additional observation regarding the freedom of association, collective bargaining, and workplace collaboration was that <u>some workers lacked an understanding of the roles and functions of the welfare committee</u>. They were unaware that the committee could provide assistance and address complaints. This lack of awareness might stem from the introduction of new employees into the factory or inconsistent training regarding the welfare committee. In some factories, there might be a lack of communication about the knowledge concerning the welfare committee. For example, notice boards might not mention the welfare committee's role.

Additionally, specific topics that were addressed during the interviews included the employment of child labour. Workers were aware of the legal requirement that employees must be at least 18 years old, and there was a non-discrimination policy concerning gender, religion, and age.

Section 4: The number of workers and welfare committees in the enterprises (Table 3)

| Nie | | Numl | ber of w | orkers | (persons) | | Nu | mber of v | welfare c | ommit | tees (perso | ons) |
|-----|--------|------|----------|--------|-----------|-----|-------|-----------|-----------|-------|-------------|------|
| No | Total | % | Thai | % | Migrant | % | Total | % | Thai | % | Migrant | % |
| 1 | 145 | 100 | 17 | 12 | 128 | 88 | 5 | 100 | 2 | 40 | 3 | 60 |
| 2 | 80 | 100 | 54 | 68 | 26 | 33 | 5 | 100 | 4 | 80 | 1 | 20 |
| 3 | 3,534 | 100 | 1,669 | 47 | 1,865 | 53 | 15 | 100 | 8 | 53 | 7 | 47 |
| 4 | 5,618 | 100 | 1,635 | 29 | 3,983 | 71 | 15 | 100 | 8 | 53 | 7 | 47 |
| 5 | 406 | 100 | 100 | 25 | 306 | 75 | 5 | 100 | 3 | 60 | 2 | 40 |
| 6 | 2,910 | 100 | 2,663 | 92 | 247 | 8 | 8 | 100 | 6 | 75 | 2 | 25 |
| 7 | 1,584 | 100 | 1,584 | 100 | 0 | 0 | 7 | 100 | 7 | 100 | 0 | 0 |
| 8 | 4,744 | 100 | 367 | 8 | 4,377 | 92 | 7 | 100 | 1 | 14 | 6 | 86 |
| 9 | 8,621 | 100 | 2,421 | 28 | 6,200 | 72 | 9 | 100 | 3 | 33 | 6 | 67 |
| 10 | 937 | 100 | 883 | 94 | 54 | 6 | 11 | 100 | 10 | 91 | 1 | 9 |
| 11 | 545 | 100 | 299 | 55 | 246 | 45 | 8 | 100 | 6 | 75 | 2 | 25 |
| 12 | N/A | 100 | N/A | N/A | N/A | N/A | N/A | 100 | N/A | N/A | N/A | N/A |
| 13 | 3,838 | 100 | 1002 | 26 | 2,836 | 74 | 8 | 100 | 3 | 38 | 5 | 63 |
| 14 | 184 | 100 | 39 | 21 | 145 | 79 | 5 | 100 | 4 | 80 | 1 | 20 |
| 15 | 343 | 100 | 55 | 16 | 288 | 84 | 7 | 100 | 3 | 43 | 4 | 57 |
| 16 | 13,178 | 100 | 2,291 | 17 | 10,887 | 83 | 15 | 100 | 5 | 33 | 10 | 67 |

Table 3: The number of workers and welfare committees in the enterprises in 2023

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| No | | Num | ber of w | orkers | (persons) | | Nu | mber of v | welfare c | ommit | tees (perso | ons) |
|-------|--------|-----|----------|--------|-----------|----|-------|-----------|-----------|-------|-------------|------|
| No | Total | % | Thai | % | Migrant | % | Total | % | Thai | % | Migrant | % |
| 17 | 5,512 | 100 | 3,780 | 69 | 1,732 | 31 | 7 | 100 | 5 | 71 | 2 | 29 |
| 18 | 2,543 | 100 | 1,290 | 51 | 1,253 | 49 | 8 | 100 | 4 | 50 | 4 | 50 |
| 19 | 489 | 100 | 149 | 30 | 340 | 70 | 7 | 100 | 5 | 71 | 2 | 29 |
| 20 | 249 | 100 | 52 | 21 | 197 | 79 | 6 | 100 | 4 | 67 | 2 | 33 |
| 21 | 4,082 | 100 | 813 | 20 | 3,269 | 80 | 17 | 100 | 7 | 41 | 10 | 59 |
| 22 | 191 | 100 | 84 | 44 | 107 | 56 | 7 | 100 | 5 | 71 | 2 | 29 |
| 23 | 1,796 | 100 | 315 | 18 | 1,481 | 82 | 7 | 100 | 1 | 14 | 6 | 86 |
| 24 | 891 | 100 | 145 | 16 | 746 | 84 | 5 | 100 | 2 | 40 | 3 | 60 |
| 25 | 607 | 100 | 208 | 34 | 399 | 66 | 5 | 100 | 3 | 60 | 2 | 40 |
| 26 | 3,285 | 100 | 728 | 22 | 2,557 | 78 | 13 | 100 | 5 | 38 | 8 | 62 |
| Total | 66,312 | 100 | 22,643 | 34 | 43,669 | 66 | 212 | 100 | 114 | 54 | 98 | 46 |

Remark: Entry no. 12 with N/A data refers to companies that did not participate in the GLP Visit 2023, hence there is no information regarding the number of employees and welfare committee members.

According to Table 3, the number of workers and welfare committees in the enterprises in 2023 can be summarized as follows:

1. <u>Total industrial workforce</u>: **66,312** people, comprising **22,643** Thai workers (34%) and **43,669** international migrant workers (66%).

2. <u>The number of welfare committee members</u> totaled **212**. Regarding the proportion between international migrant and Thai workers, there were **114** Thai members (56%) and **98** international migrant members (44%).

3. <u>Each company's welfare committees</u> ranged from 5 to 17 members (according to the law, businesses with over 50 employees must have a welfare committee consisting of a minimum of 5 members).

Other findings

1. All companies reported handling employees' complaints through three methods: suggestion boxes, welfare committees, and direct HR department communication. An example of common issues included insufficient restroom facilities during breaks. However, these facilities comply with the law, referencing the Ministerial Regulation No.63, B.E. 2551 (2008) issued pursuant to the Building Control Act, B.E. 2522 (1979) regarding restroom facilities in factories as follows:

- For 41-80 male workers: [toilet] 3 toilets for defecation and 3 urinals, and 3 lavatory
- For 41-80 female workers: [toilet] 6 toilets for defecation -- 3 bathrooms.
- For every additional 50 workers one more facility should be added.
- 2. Information about retirement age in 2023 was collected from each company (information from the 25 member companies). The data is as follows:
 - 2.1 Retirement age at 55: 8 companies.
 - 2.2 Retirement age at 60: 16 companies.
 - 2.3 Retirement age at 65: 1 company.

Upon reaching retirement age, companies provide severance pay according to the length of service, complying with legal standards.

Section 5: The ILO's recommendations and feedback from NGOs participating in the GLP Visit

In 2021, the Ship to Shore Rights SEA project collected GLP data from the Association and randomly sampled data from its members. The Association received recommendations to enhance the efficiency of its GLP direction through additional data collection in the areas of work conditions of workers, measures in responding to cases of workers under 18 years of age, guidelines for handling complaints, other welfare initiatives, and the rights of female workers. In 2023, the Association has gathered additional information based on the ILO's recommendations, summarized as follows:

1. Findings from additional inquiries with employer representatives based on the ILO's recommendations

- 24 out of 25 companies (96%) do not conduct pregnancy tests before hiring, indicating an intention not to discriminate against potential employees due to pregnancy. Only 1 company had such a policy in place, prompted by a past incident where an unknowingly pregnant worker suffered a miscarriage while working. The company has since abolished this practice and now promotes awareness among pregnant workers, ensuring proper support, such as transferring them to safer roles.

- 22 out of 25 companies (88%) have established written procedures for receiving and addressing complaints, ensuring clear policies or Work Instructions (WIs) are in place. These instructions specify how complaints are received and resolved within each company's designated timeframe.

- **19 out of 25 companies (76%)** <u>have measures in place to handle situations where workers under 18 are</u> <u>found working.</u> This includes terminating the employment of underage workers, informing labour inspectors, and providing appropriate counseling and education to these workers.

- **19 out of 25 companies (76%)** <u>support additional welfare initiatives or emphasize the rights of female</u> <u>workers.</u> For example, some companies establish breastfeeding rooms and provide training on prenatal and postnatal care. (Remark: Some members reported challenges related to facilities and budgets, making these initiatives difficult to implement.)

- **12 out of 25 companies (48%)** <u>have welfare committees with a balanced representation of male and</u> <u>female members.</u> (Remark: Some members indicated that committee composition is influenced by elections, and certain factories have unequal proportions of male and female workers, making it challenging to maintain a specific gender balance.

2. Feedback from NGOs (MWG) participating in the GLP Visit Activity

In 2023, the Association provided an opportunity for NGOs participating in the observation of the GLP Visit to express their opinions and suggestions after their participation. The participating NGO was Mr. Adisorn Kerdmongkol, the coordinator of the Migrant Working Group (MWG). Here are the preliminary observations and comments:

Overview of Members' Compliance with the GLP Guidelines

In general, it was found that most factories adhere strictly to the GLP Guidelines. Key issues such as child labour, fair recruitment, safety, and basic workers' rights were well-practiced. Translation of essential information into the language of migrant workers was conducted. Notice boards were displayed, and there were elections for labour welfare committees. This resulted in a generally satisfactory work environment for workers in most factories, with relatively few significant complaints. Most workers were able to explain their work and issues within the GLP Guidelines fairly well. Preliminary observations and suggestions are as follows:

2.1 Training and knowledge sharing

Companies provided information to and engaged their workers. While each factory conducted training sessions for workers on practices within the factory, safety, rights, and welfare, there was a lack of continuous review and understanding. Sometimes, the information provided to workers did not align with the current situation. Additionally, feedback from workers was often channeled through discussions within the production process, between workers and supervisors. Despite the proximity, cultural differences, fear of problems, and a limited understanding of the Thai language might have hindered active worker participation. In addition, even though many workers had been in Thailand for a long time, communication in the Thai language might have been a significant issue because they may not fully understand it. Differences in perspectives and ways of thinking further compound this challenge. Therefore, it is crucial to be aware of cultural differences in work processes and provide various communication channels for workers to express themselves effectively.

2.2 Gender dynamics at work

This aspect is often overlooked in factory operations. It might be due to it being a relatively new concept for factories or a lack of clarity in conceptual frameworks and practices. However, since the majority of the workforce in factories comprises women, issues related to women's rights are crucial. These include reproductive healthcare, pregnancy, pre and postnatal care, and the participation of women workers. Workers generally possessed knowledge about their gender issues. However, women workers did not express their needs and concerns openly. Therefore, activities or approaches should be designed to reflect the problems and needs of women workers effectively.

2.3 Fair recruitment

External factors often pose challenges, such as the policies of both Thailand and the source countries, leading to difficulties in factory operations. Moreover, the practices concerning the recruitment of international labour groups based on Thailand's internal policies still face limitations. Some factories tend to emphasize internal labour regulations, making it challenging to clearly define guidelines for the recruitment of international labour. Therefore, the Association should consider leveraging these experiences and lessons to influence policy changes effectively. This might involve pushing these issues at the policy level, contributing significantly to resolving the problems faced by factories during the labour importation crisis. Clearer guidelines might need to be established, and a collaborative assessment with members could help find solutions to recruitment issues within the country.

Section 6: Changes resulting from the GLP Visit to the members from 2016 to 2023 (Table 4)

From the data on the GLP Visit conducted with members from 2016 to 2023, it was found that members have consistently improved. Instances of non-compliance with the laws and the GLP Guidelines requiring member correction have decreased.

| Labor issues encountered \ Year of operation | Before GLP | GLP visit |
|---|---------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|
| | | 2016 | 2017 | 2019 | 2020 | 2021 | 2022 | 2023 |
| 1. Members don't have a welfare committee. | / | / | / | / | | | | |
| 2. There are no migrant workers. Welfare Committee | / | / | | | | / | | |
| 3. Welfare Committee didn't from elected. | / | / | / | | / | | / | |
| 4. The employment contract is only in Thai. | / | | | / | / | | | / |
| 5. No Pay Slip | / | / | | | | | | |
| 6. There are deductions from wases (dormitory fees, water | / | / | / | / | | | / | |
| and electricity bills, penalties). | | | | | | | | |
| 7. Workers must purchase their own work equipment. | / | / | / | / | | | | |
| 8. A bathroom card is used. | / | | | | / | | | / |
| 9. Pregnancy test before starting work | / | | / | / | / | / | | / |
| 10. There is no complaint box. | / | / | / | | | | | |

Table 4: Changes resulting from the GLP Visit to the members from 2016 to 2023.

Table description:

1. The GLP Visit was not conducted in 2018 because there was a collaboration with the ILO to design a new GLP manual for implementation in 2019.

2. Continuous follow-ups on GLP implementation were made based on issues identified by members. Ongoing issues arose within different companies, or due to changes in management teams within member companies, and turnover of trained GLP personnel. Therefore, continuous training on the GLP is crucial.

3. Currently in 2023, despite resolving several issues, new challenges have emerged. For example, contracts that are only in Thai, application of restroom cards, and pregnancy checks before entering employment. These issues stemmed from the COVID-19 situation, which forced activities to be conducted online. After the COVID-19 situation, the shift to onsite activities led to more observed issues. Additionally, internal staff changes within organizations disrupted the continuity of the GLP implementation.

Section 7: Labour recruitment information (Table 5)

The Association used a checklist designed in 2020, incorporating unofficial suggestions from the International Organization for Migration (IOM) to align with the tuna industry. This checklist has been in use since 2020. In 2023, representatives of employers filled out self-assessment forms and returned them to the Association. The Association conducted interviews with employer representatives and randomly selected employee representatives to compile the data for reporting. Table 5 summarizes the expenses for recruiting international migrant workers, divided into two parts: expenses in the source countries (items 1-4) and expenses incurred in Thailand (items 5-12).

| No. | Expenses occurred during recruitment | # Of | C | ıy. | Change 23/22 | | | | |
|------------|--|---------|------|-----|-----------------|----|------|--|--|
| | | company | 20 | 22 | 20 | 23 | (%) | | |
| | | | No. | % | No. | % | | | |
| Expe | Expenses occurred in countries of origin | | | | | | | | |
| $\sqrt{1}$ | Passport fee | 25 | 10 | 40 | 14 | 56 | +16% | | |
| 2 | Expenses during processing documents in country of origin (food & | 25 | 13 | 52 | 14 | 56 | +4% | | |
| | accommodations) | | | | | | | | |
| 3 | Contract signing fee, uniform smart card, life insurance at country of origin | 25 | 14 | 56 | 15 | 60 | +4% | | |
| 4 | Service fee for recruitment agencies in country of origin | 25 | 17 | 68 | 17 | 68 | 0 | | |
| Expe | nses occurred in Thailand | | | | | | | | |
| Ь | Visa fee | 25 | 14.5 | 58 | 20.5 | 82 | +24% | | |
| 6 | Fee for Work permit | 25 | 14.5 | 58 | 20.5 | 82 | +24% | | |
| 7 | Health check-up | 25 | 19 | 76 | 20 | 80 | +4% | | |
| 8 | Hepatitis check-up | 25 | 19 | 76 | 20 | 80 | +4% | | |
| 9 | Food, water, and transportation in Thailand | 25 | 20 | 80 | 21 | 84 | +4% | | |
| 10 | Expense in COVID-19 Swab test (ATK, PCR) | 25 | 19 | 76 | 21 | 84 | +8% | | |
| 11 | 6 Disease screening checkup required for Work permit | 25 | 17 | 68 | 21 | 84 | +16% | | |
| 12 | Expense for COVID-19 14-days quarantine measure | 25 | 14 | 56 | 18 | 72 | +16% | | |

Table 5: Labour recruitment information – recruitment expenses

*Remark: 1. One company did not participate in the activities because the company no longer produced tuna products, yet its membership is continued.

2. In 2023, the data in No.5 and 6 are presented in decimal numbers (0.5), indicating that some companies shared expenses with the workers.

- Category 5: Visa costs in 2023 totaled 20.5 THB, in other words, the company paid 20 THB, and an additional 1 THB was shared with the workers.

- Category 6: Work permit costs in 2022 totaled 20.5 THB, or the company paid 20 THB, and an additional 1 THB was shared with the workers.

From Table 5, the labour recruitment and expenses are summarized as follows:

1. Out of 25 member companies, 14 companies have covered expenses in all categories 1-12 for all their workers (56%). This includes companies of all sizes. The primary reason is the increased importance of workers' expenses. Moreover, members aim to retain international migrant workers within their companies for a longer period and reduce expenses for the workers.

2. When comparing expenses between the years 2022 and 2023, it is found that in 2023, a higher number of member companies took responsibility for worker expenses in almost every category, showing an increase of 4-24%. The exceptions were in category 4, the agency service fees in the source countries.

- **Expenses in the source countries** (from high to low) include Passport obtainment fees (16%), documents in the source countries (4%), contract signing/shirts/smartcards/life insurance on the Myanmar side (4%).

- **Expenses incurred in Thailand** (from high to low) include work permit fees (24%), visa fees (24%), and health checks for 6 forbidden diseases for work permit application (16%).

Remark: Personal expenses of migrant workers, following the Foreigners' Working Management Emergency Decree, B.E. 2560 (2017), section 49 states that "**personal expenses**, such as passport fees, health checkups, work permits, and other similar expenses, shall be the responsibility of workers." The table illustrates that many members are responsible for expenses beyond what the law mandates.

Section 8: Human rights information

In 2021, the United Nations (UN) emphasized the increasing importance of labour rights. Therefore, the Association designed a checklist based on the Human Rights Due Diligence Handbook of the National Human Rights Commission and received approval during the 1st/2021 Labour Committee meeting held on July 7, 2021. It was tailored to be in line with the tuna industry and has been in use since 2021. In 2023, the companies submitted self-assessments and relevant documents, which the Association used as supplementary information during employer or HR representative interviews. From the data collected, the top three issues that most members have addressed are as follows:

- **25 member companies** <u>have policies against discrimination</u> based on gender, religion, and nationality. They do not discriminate against labour in recruitment or within the workplace.

- **25 member companies** <u>have signed the new TTIA Ethical Labour Practice</u>. This policy includes expanded principles of labour ethics, covering labour rights and freedoms (in accordance with the TTIA/TPFA COC amended in 2022, No. 10: Human Rights).

- **21 member companies** <u>have environmental and community policies in place</u>. These include periodic assessments of environmental impacts such as noise, odor, and inappropriate activities resulting from factory operations. For the remaining members, it was noted that, although the factories are located far from residential areas, external agencies regularly inspect the facilities. As a result, environmental assessments of the factories have not been conducted. However, they maintain the quality of emissions in line with legal requirements.

Other observations

- Most member companies engaged in Corporate Social Responsibility (CSR) activities. These activities covered areas such as the environment, human rights, and social services. For example, some companies donated canned fish products, constructed public facilities (such as pedestrian bridges), participated in reforestation, etc. However, due to the limitations imposed by the COVID-19 situation and budget constraints, some planned activities could not be implemented. Nevertheless, there is determination and planning for future activities.

- Currently, one company has established a harassment prevention committee, entirely composed of 7 women (which goes beyond legal requirements). This committee is responsible for handling complaints and assisting workers who have experienced sexual harassment.

- Most member companies have only taken policy-level actions regarding human rights and have not yet implemented other specific activities.

- There is a rising trend in raising the importance of human rights on international stages. In the future, the Association plans to monitor member activities more closely, promote increased participation in relevant activities, such as promoting participation as exemplary organizations in human rights-related events, organized by the Rights and Liberties Protection Department, and conduct training to enhance human rights understanding within the seafood processing industry.

Appendix: GLP visits

In 2023, the TTIA/TPFA carried out GLP Visit activities with all 25 member companies from 26 companies, starting in June 2023 until August 2023, the schedule is as shown in the table.

| | Company | June | July | August |
|----|--|-----------|------------|-----------|
| 1 | A.E.C. CANNING CO., LTD | | | 22 Aug 23 |
| 2 | ABD KHAN CO., LTD | | | 25 Aug 23 |
| 3 | ASIAN ALLIANCE INTERNATIONAL CO., LTD. | 27 Jun 23 | | |
| 4 | CHOTIWAT MANUFACTURING CO., LTD. | | | 4 Aug 23 |
| 5 | DIAMOND FOOD PRODUCT., LTD | | 20 July 23 | |
| 6 | GLOBAL FROZEN FOOD (THAILAND) CO., LTD. | | | 2 Aug 23 |
| 7 | I.S.A. VALUE CO., LTD. | | 21 July 23 | |
| 8 | I-TAIL PUBLIC CO., LTD. | | 12 July 23 | |
| 9 | KINGBELL PRODUCER CO., LTD | | | 23 Aug 23 |
| 10 | MMP INTERNATIONAL CO., LTD. | | | 16 Aug 23 |
| 11 | P & T FOOD CO., LTD | | 18 July 23 | |
| 12 | P.C. TUNA CO., LTD | | | 24 Aug 23 |
| 13 | PATTHANA MARINE CO., LTD | - | - | - |
| 14 | PATAYA FOOD INDUSTRIES LTD. | 28 Jun 23 | | |
| 15 | PREMIER CANNING INDUSTRY CO., LTD. | | | 17 Aug 23 |
| 16 | RS CANNERY CO., LTD. | | 5 July 23 | |
| 17 | S.K. FOOD (THAILAND) PUBLIC CO., LTD. | | 14 July 23 | |
| 18 | S.P.A. INTERNATIONAL FOOD GROUP CO., LTD. | | | 15 Aug 23 |
| 19 | SIAM INTERNATIONAL FOOD CO., LTD. | | | 18 Aug 23 |
| 20 | SIAM TIN FOOD PRODUCT CO., LTD. | | 19 July 23 | |
| 21 | SOUTHEAST ASIAN PACKAGING AND CANNING LTD. | | 7 July 23 | |
| 22 | THAI INABA FOODS CO., LTD | | 6 July 23 | |
| 23 | THAI UNION GROUP PUBLIC CO., LTD. | | | 1 Aug 23 |
| 24 | THAI UNION MANUFACTURING CO., LTD. | | 11 July 23 | |
| 25 | TROPICAL CANNING PUBLIC (THAILAND) CO., LTD. | | | 3 Aug 23 |
| 26 | UNICORD PUBLIC CO., LTD. | | 13 July 23 | |

A.E.C. CANNING CO., LTD







ABD KHAN CO., LTD



ASIAN ALLIANCE INTERNATIONAL CO., LTD.





CHOTIWAT MANUFACTURING CO., LTD.





DIAMOND FOOD PRODUCT., LTD





GLOBAL FROZEN FOOD (THAILAND) CO., LTD.





I.S.A. VALUE CO., LTD.





I-TAIL PUBLIC CO., LTD.





KINGBELL PRODUCER CO., LTD





MMP INTERNATIONAL CO., LTD.





P & T FOOD CO., LTD





P.C. TUNA CO., LTD





PATAYA FOOD INDUSTRIES LTD.





PREMIER CANNING INDUSTRY CO., LTD.





RS CANNERY CO., LTD.





S.K. FOOD (THAILAND) PUBLIC CO., LTD.





S.P.A. INTERNATIONAL FOOD GROUP CO., LTD.





SIAM INTERNATIONAL FOOD CO., LTD.





SIAM TIN FOOD PRODUCT CO., LTD.





SOUTHEAST ASIAN PACKAGING AND CANNING LTD.





THAI INABA FOODS CO., LTD





THAI UNION GROUP PUBLIC CO., LTD.





THAI UNION MANUFACTURING CO., LTD.





TROPICAL CANNING PUBLIC (THAILAND) CO., LTD.





UNICORD PUBLIC CO., LTD.



