

Human Rights Impact Assessment Action Plan

October 2021 - February 2022

(assessment carried out at Pilgrim's UK sites and farms)





Human Rights Impact Assessment Executive Summary

Impactt has undertaken a Human Rights Impact Assessment (HRIA) on behalf of Pilgrim's UK, Co-op and Waitrose. The assessment covered the period between October 2021 to February 2022 and focused on Pilgrim's UK's outdoor-bred pig and lamb farms, and its processing and abattoir sites in the UK, from which Co-op and Waitrose source the majority of their pork products (and lamb products for Waitrose).

The purpose of the HRIA is to help Pilgrim's UK, Co-op and Waitrose gain a deeper understanding of how their business practices are affecting farmers, workers and other stakeholders working in the pig and lamb supply chains, and the actions they can take to mitigate, prevent or remediate any identified impacts. For clarity pig supply chain refers to a shared supply chain of Co-Op and Waitrose and lamb supply chain is Waitrose only.

The assessment is the first of its kind for the protein supply chain in Europe due to its scale and wide-ranging criteria – it aims to help achieve Pilgrim's UK's ambition of a fully transparent supply chain.

For more detail, please refer to the main report and the action plan.









Methodology

Impactt's HRIA methodology is informed by the Danish Institute for Human Rights framework and designed to identify any negative human rights impacts on key rights-holders, workers and farmers in the pork and lamb supply chains resulting from Pilgrim's UK, Co-op and Waitrose's business activities and relationships. The report also identifies positive impacts and good practices. The HRIA was informed by:

- The International Labour Organisation (ILO) Core Conventions at Work
- The Universal Declaration of Human Rights (UDHR)
- The Ethical Trading Initiative (ETI) Base Code
- The United Nations Guiding Principles (UNGPs)

Impactt's HRIA is worker-centric and prioritises the testimony of workers through interviews to ensure results reflect their lived experiences. It is not designed to investigate and triangulate individual incidents reported by workers, but to verify the existence of systemic problems with human rights implications.

Impactt carried out on-site assessments at two abattoirs, two processing sites (all owned

by Pilgrim's UK), eight integrated British Quality Pork (BQP) farms, two independent farms, and four lamb farms. The HRIA has highlighted the interconnecting dependency of the meat processing supply chain.

As part of the HRIA Impactt engaged a total of 127 people:

- 74 workers
- · 9 pig farmers
- · 4 lamb farmers
- 18 internal head office teams from Pilgrim's UK, Co-op, and Waitrose, including procurement, buying and human rights teams
- 12 management teams from Pilgrim's UK sites
- 4 representatives from 4 NGOs
- 6 representatives from 2 recruitment agencies



Context and key findings

The Human Rights Impact Assessment, undertaken by Impactt, was carried out between October 2021 and February 2022 – a period in which the UK pork industry faced the most severe challenges in its history. This included labour shortages and the impact of the Covid-19 pandemic, which, in part, resulted in a prolonged backlog of pigs on farms. Thanks to collaboration with Government - enabling access to the Seasonal Workers Scheme - the backlog has cleared, but there is work in place now to alleviate subsequent pressures associated with labour shortages.

Despite these ongoing challenges, Pilgrim's UK and its retail partners in this Human Rights Impact Assessment, Co-op and Waitrose, continue to do all they can to further understand their supply chains, working together to raise awareness and increase standards of human rights and uphold high welfare standards for all workers involved in their business and farming supply chain.

Agriculture

Pilgrim's UK holds long-term supplier relationships with both Co-op and Waitrose. These relationships have been in place for over 40 years and, through close collaboration, this helped to ensure there was no loss of jobs to the farms that are featured in this assessment as a result of the Covid-19 pandemic in February 2022.

Fully integrated supply chain

- Pilgrim's UK's farming model is fully vertically integrated from farm-to-fork, ensuring animal welfare and sustainable farming practices are at the forefront of the business' operations.
- Pilgrim's UK works with around 340 farming partners in unique and diverse regions of the country to produce high welfare pigs. Its contract pig farming model has worked successfully for over 40 years, encouraging many young entrants to establish themselves in the farming industry and grow further with the business over time.
- It also works closely with around 450 of the UK's leading independent lamb producers to supply the highest quality lamb to customers. Its producers in Wales and the West Country are all members of its producer groups, and some have been supplying the business for 30 years. During the pandemic, Pilgrim's UK purchased additional lambs from many producers due to the surge in demand and prices remained strong.



Maintaining high production and management standards

- Pilgrim's UK's dedicated agricultural team oversees all aspects of agriculture management including pig genetics, pig feed, veterinary support, production and management standards, and livestock transportation.
- Pilgrim's UK has dedicated resource to help support HR and H&S functions in its supply chain.
- Farmers are paid a
 management fee that enables
 the pigs to be kept to the
 standards Pilgrim's UK expects.
 Its contracted farmers provide
 the buildings, labour and
 machinery, water, on-farm costs
 and straw to manage the BQP
 pigs to the highest welfare
 standards.

Abbattoirs and Processing sites

Living Wages

At the time of the assessment, all workers at Pilgrim's UK's sites featured were paid at or above the rate set by the Living Wage Foundation. At the time of the assessment, this was £9.90 per hour.

Accommodation and Transport

Market rate accommodation in
the form of rental properties were

leased for all workers who came to work at Pilgrim's UK via the Seasonal Workers Scheme. The majority of these workers were housed and working in the South-West and Wales area. Workers were only charged £58.52 per week for this accommodation, with Pilgrim's UK absorbing the extra costs involved in this (rental costs in the area covered by the assessment being as high as £210 per week). Pilgrim's UK also provided free transport to and from the site featured in the assessment for those workers.

Health and Safety

Pilgrim's UK runs an extensive audit programme across its business and has dedicated health, safety and environmental resource that conduct regular risk assessments. Pilgrim's UK is also certified to ISO 45001 in Health & Safety.

All workers are given health and safety training during their inductions at Pilgrim's UK's sites.

At the time of assessment, Covid-19 tests were being carried out during day shifts, and start times and breaks were staggered. There were also significant changes to working practices during the assessment due to Covid-19.



Key Findings and Recommendations	Pilgrim's UK Comments	Actions Planned/Taken	Action Plan Lead	Timeframe
Due to the long-term relationships established with farmers, there was insignificant impact on their income during Covid-19 pandemic. No workers lost jobs due to the pandemic.	Continue with the Pilgrim's UK long-term partnership model.	Its BQP farming model, part of Pilgrim's UK, is fully vertically integrated from farm-to-fork, ensuring animal welfare and sustainability at every stage. Pilgrim's UK works with around 340 farming partners to produce high welfare pigs. Its contract pig farming model has worked successfully for over 40 years and has allowed many young entrants to establish themselves in the farming industry and grow further with the organisation over time. Several of Pilgrim's UK's farmers have worked with the business for decades and it is now working with the grandchildren of some of its original farmers – a success story across generations. Its dedicated team at BQP, part of Pilgrim's UK, controls and manages all aspects including pig genetics, pig feed, veterinary support, production and management standards, and livestock transportation. Farmers are paid a management fee that enables the pigs to be kept to the standards Pilgrim's UK expects. Pilgrim's UK contracted farmers provide the buildings, labour and machinery, water, on-farm costs, and straw to manage the BQP pigs to the highest welfare standards. Pilgrim's UK works closely with around 450 of the UK's leading independent lamb producers to supply the highest quality lamb to customers. Its producers in Wales and the West Country are all are members of its Producer Groups, and some have been supplying the business for 30 years, something it celebrated with a Champagne reception with producers and Retail customers at the Royal Welsh Show in July 2022. During the pandemic, Pilgrim's UK purchased additional lambs from many producers due to the surge in demand and prices remained strong. Working closely with its farmers, it provides support and guidance to ensure its high welfare and production standards are met and to help drive environmental sustainability. Pilgrim's UK has been working with a dedicated group of farmers for over 30 years who farm unique and diverse regions of the country. Within BQL, its contracted farmers provide the land, grazing, fencing, water,	None required – continue with the Pilgrim's UK model.	Complete/ Ongoing

Key Findings and Recommendations	Pilgrim's UK Comments	Actions Planned/Taken	Action Plan Lead	Timeframe
Evidence of family working on both pork and lamb farms. This includes some young family members helping at peak times. Absence of contracts for family workers.	Industry-wide issues common across all areas of farming.	Pilgrim's UK, Waitrose and Co-op will develop guidance and messaging on the topic, working together with multiple industry stakeholders including the National Farmers' Union (NFU). The messaging will be developed to highlight UK law regarding contracts for family workers and the safeguards in place regarding young workers. Follow up to track progress in worker welfare survey every two years with 100% of farms completing the survey.	Co-op/ Waitrose Pilgrim's UK to support in roll out to farmers.	July 2023
Workers on farms working excessive hours, especially family members, impacting wage levels across farms.	Systemic industry-wide problem which needs cross sector work to tackle.	Additional monitoring within a pilot group to understand exactly what duties are impacting working hours and impacting wage levels. Work collaboratively across industry, via FNET with other protein producers to develop guidance/training and best practice, including seeking independent help to understand all implications and outcomes.	Pilgrim's UK with support from Waitrose and Co-op to engage other protein suppliers/ producers.	Sept 2023

Key Findings and Recommendations	Pilgrim's UK Comments	Actions Planned/Taken	Action Plan Lead	Timeframe
Lack of consistency in the levels of awareness and training within farming business on health & safety.	At Pilgrim's UK, safety is a condition, not a priority. What does Pilgrim's UK mean by 'safety is a condition'? A condition is an essential requirement that must be satisfied before anything else can happen. Therefore, Pilgrim's UK shall not operate any of its processing plants unless it has met the condition of a safe working environment. Simply put, Pilgrim's UK does not tolerate unsafe working conditions or unsafe acts. Pilgrim's UK will continue to be the industry leader in providing a safe working environment for its team members. All team members are required to stop unsafe acts and correct unsafe conditions immediately. All team members have the absolute right to refuse a job task they feel is unsafe. Working together, Pilgrim's UK can eliminate all unsafe conditions and unsafe acts and create a work environment where everyone on its team is totally committed to its safety culture.	Pilgrim's UK will reinforce current messaging and improve this in areas highlighted. Pilgrim's UK will review the signposting and checks that are currently carried out on its farmers' sites. It is important to note that each farm is an individually owned separate business rather than owned directly by Pilgrim's UK. Pilgrim's UK also offers awareness raising courses for all farmers on a rolling basis dealing with agricultural health and safety, which can now resume in person as well as online.	Pilgrim's UK	Ongoing

Mental wellbeing of farmers Mental health is a priority for the business, and Pilgrim's UK recognises the difficulties that can be attached to farming as a profession. During the year the business has held awareness raising webinars for its farmers in partnership with the FCN. Mill be talking at various events through the year to signpost these issues. FCN has also had a spessence at its stand at the Royal Welsh Show Winter Fair. The Pilgrim's UK executive team has also each of the parameters of the Responsible Sourcing Code of Practic. Co-op has championed mental health in its supply chain for a number of years by organizing supplemental health.	Key Findings and Recommendations	Pilgrim's UK Comments	Actions Planned/Taken	Action Plan Lead	Timeframe
charities and supporting industry initiatives. It will continue to promote the conversation around mental health into the future. Co-op Ongoing		UK recognises the difficulties that can be attached to farming as a profession. During the year the business has held awareness raising webinars for its farmers in	and wider agricultural team in mental health support awareness. This team will be able to help and support its farmers when they are in field. The training covers spotting the signs and signposting support. In addition, Pilgrim's UK has trained 18 mental health first aiders, which will equal 20% of its agricultural team, who will be able to support more deeply and help deal with issues as they arise. Pilgrim's UK's field teams and vets will also be given mental health first aid kits, sponsored by FCN (Farmers Community Network https://fcn.org.uk/). FCN will be talking at various events through the year to signpost these issues. FCN has also had a presence at its stand at the Royal Welsh Show Winter Fair. The Pilgrim's UK executive team has also signed a mental health charter to show its commitment to mental health awareness and training. Waitrose will develop guidance and support for farmers to understand how UK legislation around working conditions can be applied and implemented within the parameters of the Responsible Sourcing Code of Practice. Co-op has championed mental health in its supply chain for a number of years by organising farmer meetings with mental health charities and supporting industry initiatives. It will continue to promote the conversation	Waitrose	

Key Findings and Recommendations	Pilgrim's UK Comments	Actions Planned/Taken	Action Plan Lead	Timeframe
Access to grievance mechanisms	Due to the size of the farms involved there is a lack of collective bargaining or other formal mechanisms. Grievances tend to be raised informally, especially within family operations and so visibility of grievances raised is less clear.	Pilgrim's UK will work with farmers and highlight the need to record grievances raised and actions taken to resolve them. Pilgrim's UK will continue to promote the Speak Up helpline (Pilgrim's UK's confidential, anonymous whistle blowing line), which is available to all its farming community to access through the farming newsletter and other communications to farmers, restating that there are no reprisals if issues are found this way to anyone involved. Pilgrim's UK will make sure signposting is clearer around this to ensure it reaches all levels of workers. Pilgrim's UK will monitor levels of incidence reporting. Pilgrim's UK is willing to collaborate in work investigating how informal relationships can be strengthened by looking at best practice in different agricultural supply chains.	Pilgrim's UK with support from Co-op and Waitrose where relevant.	Ongoing
Since the research was carried out Pilgrim's UK has developed Modern Slavery Awareness training for farmers and its agricultural team in partnership with Slave Free Alliance (https://www.slavefreealliance.org/).	Pilgrim's UK will continue to promote this training to farmers and encourage take up of the training through other mediums such as events, newsletters and producer working groups. Farmers can also access Stronger Together (https://www.stronger2gether.org/) as part of being members of the Waitrose and Co-op supply chains. Co-op and Waitrose support and engage with various industry bodies and NGOs to help address the root cause of Modern Slavery and to promote best practice. For example, Stronger Together produces Guidance for	Pilgrim's UK supported by Co-op and Waitrose with messaging to farmers to raise awareness. Co-op & Waitrose	Ongoing	
		Stronger Together produces Guidance for Farms which has been made possible with retailers' support.	Waltrose	

Key Findings and Recommendations	Pilgrim's UK Comments	Actions Planned/Taken	Action Plan Lead	Timeframe
Gender discrimination	No evidence was found of any discriminatory practices however general standards on farms have lacked a gender lens previously.	More work is needed to understand the barriers to women working on farms. Pilgrim's UK, Co-op and Waitrose will run a survey at a number of farms to gather some baseline data. Pilgrim's UK would like to work with other stakeholders across other agricultural sectors, such as produce, to help develop guidance and practical advice that can work across farms regardless of size or location. Positive case studies on gender in agriculture should be developed to promote across agriculture and farming.	Pilgrim's UK to lead on survey with farmers. Support from Co-op and Waitrose on drafting guidance and case studies.	Dec 2024

Key Findings and Recommendations	Pilgrim's UK Comments	Actions Planned/Taken	Action Plan Lead	Timeframe
Understanding of contracts	Pilgrim's UK recognises that English is not the first language of a number of its employees and that despite translation being offered during induction, understanding may not be clear.	Pilgrim's UK is in the process of updating its staff handbook into "Plain English." (http://www.plainenglish.co.uk/). Once this is completed it will be translated into the most common languages across all its sites. Pilgrim's UK, where possible, will use infographics rather than block text to aid understanding. These will then be re-issued to all employees as part of its usual refresher programme.	Pilgrim's UK	June 2023

Key Findings and Recommendations	Pilgrim's UK Comments	Actions Planned/Taken	Action Plan Lead	Timeframe
Principle. During the impact assessment it was recruitment fees had been paid or not. On involve pilgrim's UK, it was proven that unlawful not been paid and that all associated costs had paid were covered by Pilgrim's UK. The inverse carried out whilst workers were working temporary extension of the Seasonal Worker which allowed six-month visas to help deal		Pilgrim's UK continues to operate unannounced worker welfare audits across all its sites on an annual basis. This is an essential part of its due diligence for all workers who work at its sites, no matter their recruitment journey.	Pilgrim's UK	Ongoing
	Pilgrim's UK is a supporter of the Recruiter Pays Principle. During the impact assessment it was unclear if recruitment fees had been paid or not. On investigation by Pilgrim's UK, it was proven that unlawful fees had not been paid and that all associated costs workers had paid were covered by Pilgrim's UK. The interviews were carried out whilst workers were working through a temporary extension of the Seasonal Workers Scheme	Pilgrim's UK has extra checks in place prior to recruitment for any workers who come through the Skilled Worker Visa Scheme. Pilgrim's UK also runs additional checks and offers additional support to workers who come through the Skilled Worker Visa Scheme to work in its abattoirs. This includes support for accommodation costs.	Pilgrim's UK	Ongoing
	backlog of pigs caused by the Covid-19 pandemic.	Recognising the broader industry challenges with recruitment fees, in particular on the Seasonal Workers Scheme, Co-op and Waitrose have collaborated with other retailers and key partners to sponsor industry wide multi-stakeholder roundtables designed to identify opportunities for collective action to improve the scheme for workers. A number of workstreams have been established that progress with recommendations ahead of the 2023 season.	Co-op & Waitrose in collaboration with suppliers and industry stakeholders.	End 2023

Key Findings and Recommendations	Pilgrim's UK Comments	Actions Planned/Taken	Action Plan Lead	Timeframe
Labour shortages	Pilgrim's UK has been very proactive in putting initiatives in place to recruit people into the industry and train them with the necessary skills and will continue to do so. The Seasonal Worker Scheme had significant challenges and limitations, which included being restricted to four recruitment providers with no experience in finding the specific skilled processors required.	Since the impact assessment, Pilgrim's UK is working with a specialist licensed GLAA agency, recruiting Filipino butchers on the Skilled Workers Visa Scheme. Pilgrim's UK has currently recruited 152 butchers through this scheme to date and continue to use this route to help fill gaps in its workforce. Pilgrim's UK supports these workers with the cost of accommodation and settling into life in the UK. Pilgrim's UK will continue to include these workers in additional welfare checks as part of its unannounced worker welfare audit programme. Pilgrim's UK will continue to monitor and action the root causes that contribute to this by working collaboratively with Co-op and Waitrose, and across the industry.	Pilgrim's UK	Ongoing
Living wages	Pilgrim's UK pays over the national living wage rate at all its sites. Pay levels are set according to skill level of the tasks being carried out in each role which can be different on each production line. The perception can be that everyone on one line will earn the same, however wage rates are at a skill level within a lines operation.	Pilgrim's UK will continue to monitor workers' salaries and validate compliance with its policies via audits and worker welfare conversations. Pilgrim's UK will continue to work with its agency partners to ensure any deductions are clear and explained.	Pilgrim's UK	Ongoing

Key Findings and Recommendations	Pilgrim's UK Comments	Actions Planned/Taken	Action Plan Lead	Timeframe
Mental health is a priority for the business, and Pilgrim's UK recognises the difficulties that can be attached to food production.		There is a comprehensive support system in place for mental health which Pilgrim's UK is also in the process of formalising. Pilgrim's UK has mental health first aiders in place at nine sites. Pilgrim's UK has further training for another 16 mental health first aiders taking place in October and November 2022. Pilgrim's UK's ambition is to have full coverage at	Pilgrim's UK	July 2023
	all its sites. The Pilgrim's UK executive team has signed a mental health charter outlining its support to all employees. Pilgrim's UK is launching a "Talk Team" across all its sites. This will be people who are trained to help employees and signpost them to any help they may need. These will receive training on mental health awareness and in signposting and being the first point of contact in addition to the Mental Health First Aiders.	Pilgrim's UK	Complete	

Key Findings and Recommendations	Pilgrim's UK Comments	Actions Planned/Taken	Action Plan Lead	Timeframe
		Pilgrim's UK is further developing its Modern Slavery Incidence Response Team based across all sites, in partnership with Slave Free Alliance. This will increase the number of people who are specially trained in spotting, investigating, and supporting potential victims of labour exploitation and modern slavery.	Pilgrim's UK	March 2023
Risk of modern slavery	Pilgrim's UK has already developed and rolled out training for all line leaders/supervisors/ managers on modern slavery including spotting the signs and what action to take. This training is compulsory for anyone who has any level of management responsibility.	Both the Co-op and Waitrose are sponsors of Stronger Together and the Responsible Recruitment Toolkit. Stronger Together aims to reduce modern slavery through providing guidance, training and resources to stakeholders, and by building a network of these stakeholders to work together to reduce exploitation. The Responsible Recruitment Toolkit aims to support businesses develop robust, ethical and professional recruitment practices by providing them with trainings and step-by-step guidance. Through sponsorship of these programmes, both Waitrose and Co-op supply chains are able to attend their trainings and networks free of charge. To improve uptake of these trainings Waitrose is proposing to mandate attendance on introduction trainings, for both programmes, reduce audit frequency for those achieving either verified Business Partner status for Stronger Together or Business Partner status for Responsible Recruitment, and audit exemption for those that achieve both. Co-op and Pilgrim's UK will continue to collaborate on promoting placements through Bright Future Co-operative. This scheme	Waitrose/ Co-op Waitrose	Ongoing July 2023
		brings together business members and charity referral partners to offer placements to survivors of modern slavery, leading to full time employment and successful rehabilitation on their journey through the National Referral Mechanism. Both Co-op and Pilgrim's UK are voluntary board members and work collaboratively with other business and charity partners to promote the initiative across all industry sectors within the UK.	Pilgrim's UK / Co-op	Ongoing

Key Findings and Recommendations	Pilgrim's UK Comments	Actions Planned/Taken	Action Plan Lead	Timeframe
Health and safety	At Pilgrim's UK, safety is a condition, not a priority. What does Pilgrim's UK mean by 'safety is a condition'? A condition is an essential requirement that must be satisfied before anything else can happen. Therefore, Pilgrim's UK shall not operate any of its processing plants unless Pilgrim's UK has met the condition of a safe working environment. Simply put, Pilgrim's UK does not tolerate unsafe working conditions or unsafe acts. Pilgrim's UK will continue to be the industry leader in providing a safe work environment for its team members. All team members are required to stop unsafe acts and correct unsafe conditions immediately. All team members have the absolute right to refuse a job task they feel is unsafe. Working together, Pilgrim's UK can eliminate all unsafe conditions and unsafe acts and create a work environment where everyone on its team is totally committed to its safety culture.	Pilgrim's UK runs an extensive audit programme across its business. This includes third party external audits and second party group audits. Pilgrim's UK has dedicated safety, health and environmental resource across all its sites that conduct regular risk assessments and audits. Pilgrim's UK has risk assessments in place across all roles that require this, and these are reviewed and updated regularly. Pilgrim's UK operates under PACT – Plan, Do, Check Act methodology in this area. Pilgrim's UK will ensure that toolbox talks are carried out to reinforce this messaging and increase communications as part of its ongoing programme.	Pilgrim's UK	Ongoing
Right to health	During the assessment, a few workers were struggling to access the health system in the UK.	Pilgrim's UK has now amended its "Welcome" pack for new starters from outside of the UK to include help and support registering with a GP.	Pilgrim's UK	Completed

Key Findings and Recommendations	Pilgrim's UK Comments	Actions Planned/Taken	Action Plan Lead	Timeframe
Discrimination	There were a number of reports from workers that they were treated differently because they were migrant workers, and their level of English was lower than British nationals. Pilgrim's UK has dignity at work training in pace that was suspended during the pandemic. This is now fully operational.	Pilgrim's UK will continue to further roll out "Respect Training." This programme was developed to help its sites deal with their diverse, changing workforces, and how they integrate with each other. Pilgrim's UK believes that this is an issue across the meat industry and would seek to work with other meat companies, supported by Co-op and Waitrose, to develop and adapt a training that could be run across the sector.	Pilgrim's UK to lead supported by Co-op and Waitrose to engage others in the protein industry.	End 2024
Worker representation	Whilst all of Pilgrim's UK's sites have worker committees in operation, and a number are unionised with collective bargaining, it acknowledges that migrant workers may not be effectively represented.	Using the learnings from the recent pilot project undertaken by FNET, which was supported by Waitrose and Co-op, Pilgrim's UK will build on the capacity and strengthen the worker committees by ensuring representation and "Champions" for agency/migrant workers.	Pilgrim's UK	June 2023
Access to grievance mechanisms	Pilgrim's UK continues to promote its Speak Up line as well as other channels of raising grievances. Understanding of the channels available will be improved once the handbook is translated and this is rolled out across the business.	Pilgrim's UK will ensure the Speak Up helpline posters are available in all relevant languages for each site. Grievances are covered in the staff handbook which is being rewritten and translated.	Pilgrim's UK	April 2023