

Attachment 2 to the Guidebook for Respecting Human Rights in Food Enterprises

Worksheet templates for identification and assessment of adverse impacts Step 1 to Step 3

These worksheet templates are based on the worksheet templates in Attachment 2 to the Reference Material on Practical Approaches for Business Enterprises to Respect Human Rights in Responsible Supply Chains (“the Reference Material”) and have been modified for

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Areas of human rights to be respected by business enterprises

In implementing measures to respect human rights in accordance with the Guidebook for Respecting Human Rights in Food Enterprises, food enterprises are required to respect internationally recognized human rights (see p. 4 of the Guidebook and pp. 4-5 of Reference of the Guidebook). Attachment 1 to the Guidebook sets out points to consider in addressing specific human rights risks to deepen the understanding of the human rights risks that are considered particularly important for the food industry.

Address also risks associated with the internationally recognized human rights other than those listed in (1) to (11) below in line with the Guidebook, with reference particularly to page 29 of the Guidebook, page 13 of Reference of the Guidebook, and the Reference Material (Attachment 1) Reference Documents, as appropriate.

Reference: Areas of human rights cited in Attachment 1 of the Guidebook

- | | |
|---|---|
| (1) Prohibition of forced labor | (7) Prohibition of excessive and unreasonable working hours |
| (2) Prohibition of child labor | (8) Fair wage payment |
| (3) Elimination of discrimination | (9) Prohibition of violence and harassment |
| (4) Respect for rights of foreign workers | (10) Protection of rights of indigenous and local peoples |
| (5) Respect for freedom of association and the right to collective bargaining | (11) Consumer safety and right to know |
| (6) Securing occupational safety and health | |

Attachment 2. Worksheet templates for identification and assessment of adverse impacts

Step 1: Identification of business fields with material risksStep 2: Identification of the processes where adverse impacts arise

Step 1: To identify business fields with material risks (products, supply chain stages, etc.), a business enterprise can examine its business activities by product and consider what adverse human rights impacts are pointed out in the supply chain of each product, for example. The result can be summarized using this worksheet.

Step 2: Regarding the risks identified in Step 1, (i) confirm any adverse human rights impacts, and (ii) check for the situations and causes of the confirmed adverse human rights impacts. The result can be summarized using this worksheet.

Business fields of the enterprise

Mainstay products	Refer to Attachment 1 for points to check					
	Main raw materials		Procurement of raw materials	Manufacturing	Transportation	Sale
		Description of adverse human rights impacts (including both actual and potential human rights abuse) (Specify where the impact arises)				
		Situations and causes of the adverse impact above (Specify where)				
		Description of adverse human rights impacts (including both actual and potential human rights abuse) (Specify where the impact arises)				
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Step 2: Regarding the risks identified in Step 1, (i) confirm any adverse human rights impacts, and (ii) check for the situations and causes of the confirmed adverse human rights impacts. The result can be summarized using this worksheet.

Business fields of the enterprise
Confectionery manufacturing and processed livestock products manufacturing

Mainstay products	Refer to Attachment 1 for points to check				
	Main raw materials		Procurement of raw materials	Manufacturing	Transportation
Chocolate confectionery	Wheat flour, palm oil, cocoa ...	Description of adverse human rights impacts (including both actual and potential human rights abuse) (Specify where the impact arises)	<p>(1) A report by a human rights organization on a country that produces the raw material for palm oil revealed that children under the age of 16 work on oil palm plantations in the country, and that they work long hours for low wages (a supplier).</p> <p>(2) We alerted a supplier organized by a human rights organization and learned that a large number of children under the age of 15 work in cocoa-producing countries in Africa (a supplier).</p> <p>(3) We learned from news reports that supervisory guidance was given to operators conducting internal labor training for suspected violations of labor standards related laws and regulations in the agriculture and food manufacturing industries, and that actual violations were confirmed in many of these cases (a group company).</p>	<p>(1) A report by a human rights organization reported that workers are forced to work for under legal wages due to the vulnerable position of workers in the countries where the supplier is located (a supplier).</p> <p>(2) Since the percentage of women in management positions at a group company was low, we inquired about the requirements for promotion and discovered that women's inaccessibility was a requirement for promotion, effectively making it difficult for women to be promoted (a group company).</p> <p>(3) An inspection of the business enterprise's own factory revealed that objects had been placed in front of the emergency exit, which could hinder evacuation in the event of a fire (the business enterprise).</p>	<p>(1) In the past, there was a scandal in which the chocolate used in a high-priced chocolate candy manufactured by the enterprise was labeled as originating from a country in Europe because for its high-quality chocolate, but was actually sourced from a different country (the business enterprise).</p> <p>(2) There is the possibility of various types of harassment, such as workplace harassment and sexual harassment against workers in retail stores (retail stores).</p>
		Situations and causes of the adverse impact above (Specify where)	<p>(1) and (2) In both countries, children have to work to support their families because their parents are unemployed or underemployed. Since the employers know these situations, they force children under 16 to work for low wages and long hours, and fire them when they complete (suppliers).</p> <p>(3) Due to employees' lack of understanding of the technical intern training program (a group company).</p>	<p>(1) Due to the employer's lack of awareness of legal compliance (a supplier).</p> <p>(2) A group company was unaware that it is prohibited to establish a transfer requirement without reasonable cause as an act of "indirect discrimination" (a group company).</p> <p>(3) Despite knowing that it was illegal to put objects in front of emergency exits, the business enterprise's lack of awareness of this prevention was the cause (the business enterprise).</p>	<p>Due to the shortage of labor, there are not enough drivers at transport companies and the drivers are forced to work long hours (transport companies).</p>
Processed livestock food	Poultry, sugars ...	Description of adverse human rights impacts (including both actual and potential human rights abuse) (Specify where the impact arises)	<p>(1) According to a human rights organization's report on a country that produces poultry used in processed products, the country's livestock industry employs many migrant workers from neighboring countries, who are forced to work under harsh conditions of low wages and long hours (a supplier).</p> <p>(2) Upon hearing at a seminar organized by an industry group that confiscation and retention of passports and other identification documents of technical intern business could constitute forced labor, we checked with group companies and found that they had confiscated identity documents in the past (group companies).</p>	<p>(1) We checked the evaluation scores of international human rights NGOs for political rights and civil liberties and found that many countries in Asia, the Middle East, and Africa do not fully guarantee freedom of association, and even the countries where our suppliers are located were among the countries where the rights were not guaranteed (suppliers).</p> <p>(2) We checked the working hours of employees of a group company and found that they work more overtime (a group company).</p> <p>(3) Suppliers may not be aware that, even if freedom of association is not fully guaranteed by national laws and regulations, international standards require them to introduce initiatives to respect freedom of association to the extent that it does not conflict with national laws and regulations, such as by creating alternative mechanisms to hear workers' opinions (e.g., grievance mechanisms) (the business enterprise).</p>	<p>Hazardous operations such as loading, unloading, and transporting heavy loads may cause occupational accidents among drivers and at sites where cargo is handled (transport companies).</p>
		Situations and causes of the adverse impact above (Specify where)	<p>(1) A supplier does not check the compliance with human rights standards of the farm from which it procures raw materials. In addition, migrant workers are forced to work under harsh working conditions since many of them are illegal workers and in vulnerable situations (a supplier).</p> <p>(2) It is due to the group company's lack of awareness that confiscation and retention of identity documents could constitute forced labor (a group company).</p>	<p>(1) Suppliers may not be aware that, even if freedom of association is not fully guaranteed by national laws and regulations, international standards require them to introduce initiatives to respect freedom of association to the extent that it does not conflict with national laws and regulations, such as by creating alternative mechanisms to hear workers' opinions (e.g., grievance mechanisms) (a supplier).</p> <p>(2) The business enterprise repeatedly placed orders with short delivery times to this group company, which caused the employees to work long hours (a group company).</p> <p>(3) There was an atmosphere in the workplace that valued hard work and made it difficult for employees to go home on time or take annual paid leave (the business enterprise).</p>	<p>When selling processed chicken products on its online store, the business enterprise posted the copy, "If you just eat this, you won't have to go to the hospital (!)" as chicken meat is effective in preventing high blood pressure. This advertisement became subject to an improvement instruction from the Consumer Affairs Agency to modify or delete the representation due to a possible violation of the Health Promotion Act (the business enterprise).</p> <p>(2) We were told that a retail enterprise committed human rights due diligence to assess the security and likelihood of adverse human rights impacts and found a high risk of discrimination against its employees (a retailer).</p>
		Description of adverse human rights impacts (including both actual and potential human rights abuse) (Specify where the impact arises)			
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Attachment 2. Worksheet templates for identification and assessment of adverse impacts

■ Step 3: Assessment of the business enterprise's involvement in adverse impacts and prioritization

Assess the business enterprise's involvement in the adverse human rights impacts identified up to Step 2.

If it is difficult to immediately address all identified adverse human rights impacts, prioritization may be made.

For details on the assessment of business enterprises' involvement and prioritization, refer to the Guidebook (4-2-1 Human rights due diligence: Identification and assessment of adverse impacts (3) Assessment of business enterprises' involvement in adverse impacts and prioritization)

Fields, locations and business partners in which there is concern of adverse human rights impacts		Description of the adverse human rights impacts	Involvement of the business enterprise ("Causing," "Contributing," "Directly linked," or "Not applicable")	Severity (Three-level assessment: High, Medium or Low)			Likelihood (Three-level assessment: High, Medium or Low)	Priority
				Scale	Scope	Irremediability		

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Fields, locations and business partners in which there is concern of adverse human rights impacts		Description of the adverse human rights impacts	Involvement of the business enterprise ("Causing," "Contributing," "Directly linked," or "Not applicable")	Severity (Three-level assessment: High, Medium or Low)			Likelihood (Three-level assessment: High, Medium or Low)	Priority
				Scale	Scope	Irremediability		
Example	Supplier A	Forced labor at a factory (Intimidation of employees on a daily basis)	Contributing (Reason:)	High	Medium	High	High	High
Example	Sales department of the head office	- Employees work long hours	Causing (Reason:)	Medium	Medium	Medium	High	Medium
Example	Mine	Child labor in mines	Directly linked (Reason:)	High	Medium	High	Medium	High
1	The business enterprise	Employees work long hours	Causing (Reason: The enterprise's failure to address the adverse impacts is causing long working hours.)	Medium	Medium	Medium	High	High
2	Group company A	Retention of identity documents of technical intern trainees (forced labor)	Directly linked (Reason: Directly linked to manufacture of the business enterprise's product)	High	Low	Medium	High	High
3	Supplier B	Employment of children (child labor)	Directly linked (Reason: Directly linked to manufacture of the business enterprise's product)	High	Low	High	Medium	High
4	Supplier C	Employees work long hours	Contributing (Reason: Orders placed by the enterprise are contributing to long working hours.)	High	High	High	High	High
5	A farm producing raw	Child labor in the farm	Directly linked (Reason: Directly linked to manufacture of the business enterprise's product)	High	Medium	High	High	Medium
6								
7								
8								