



# สมาคมอาหารแช่เยือกแข็งไทย THAI FROZEN FOODS ASSOCIATION

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Ref. No. Por Or 055/2553

June 3, 2010

**Subject:** US Department of Labor's Request for Information on Business Practices to Prevent the Likelihood of Forced Labor or Child Labor

**Attention:** Director  
The Office of Child Labor, Forced Labor and Human Trafficking (OCFT)  
The Bureau of International Labor Affairs (ILAB), USA

**Attachment:** 1. The Association's Action Plan 2010  
2. Letter from Department of Labour Protection and Welfare

Reference is made to the US Department of Labor's announcement in the Federal Register Vol. 75, No. 72/Thursday, April 15, 2010 on Request for Information on Business Practices to Reduce the Likelihood of Forced Labor or Child Labor in the Production of Goods in which appeared a report on the Public Relations Program on Human Trafficking Resolution of Thailand 2010. Additionally, the US Department of Labor also requested more information on the business practices to reduce the likelihood of forced labor and child labor in the production of goods following the issuance of List of Goods Produced by Child or Force Labor (TVPR List) and Executive Order 13126 List (Initial Determination) in 2009 indicating list of products produced by child/forced labor inclusive of Thai shrimp products, garment, sugar cane and obscene materials with a comment that the incident of child/forced labor (including Foreign labor exploitation) normally occurred in the end of the supply chain of small establishments which escaped control or regulation.

In this regard, the Association has realized and placed importance on the employment of labor in the shrimp product production as seen by the draw up of a strategic plan to regulate the labor employment of member companies as well as supply chain from which manufacturing plants obtaining raw materials. Moreover, the Association has also received collaboration from relevant organizations such as networks of shrimp farmer society/association; government agencies such as Ministry of Agriculture and Cooperatives, Ministry of Social Development and Human Security and Ministry of Labour who have placed importance at the policy levels and carried out joint activities to prevent the employment of child/forced foreign labor in the frozen marine food manufacturing industry. The action plan for the year 2010 could be outlined as follow:-

1. Project to elevate hygienic condition and quality control system of the primary marine processing plants on a continuous basis to ensure the achievement of GMP and HACCP standards respectively. In 2010 which is an initial year of the project, the Association has emphasized and campaigned against the use of child/forced labor in the frozen marine product manufacturing industry throughout the supply chain of the member plants as well as education programme on legal labor treatment of the processing plants.



2. The Association has worked closely at a policy level with organizations responsible for regulation of labour employment and welfare in the marine food product manufacturing industry such as the Ministry of Social Development and Human Security. In addition to the “Human Trafficking Prevention and Suppression Act B.E. 2008”, the Ministry of Labour has also improved and amended numerous laws and acts responsive to current situation such as the “Labour Protection Act B.E. 2008”, “Ministerial Announcement on Thai Labour Standard and Social Responsibility of Thai Business” meanwhile the Ministry of Agriculture and Cooperatives by the Department of Fishery has included the Labour Hygienic Condition within the Good Manufacturing Practices (GMP) for food production process.

3. The Association has also expanded its operation by opening up an office in Songkla province (in the Southern region) to ensure thorough regulation of labour employment of members whose plants situated in areas along the Gulf of Thailand and Andaman coasts. The Southern Office has organized training and educating sessions on labor laws for the member plants and monitoring the employment of foreign labor in the establishment and primary processing plant as well as engaging some researchers to analyze the industrial labor related problems within Songkla province.

4. Setting up a committee to jointly work with the Immigration and Customs Enforcement (ICE) to monitor the employment of labor in compliance with Thai and international laws and regulations. So far, there have been meetings to exchange information on labor problems as well as field visits to inspect employment of foreign labor practices of member companies and primary processing plants under the regulation of the member plants.

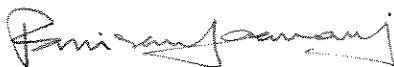
5. Collaborating with local NGOs such as International Organization for Migration (IOM) and Labor Right Promotion Network Foundation (LPN) to gain information for further improvement to promote and elevate quality of living for those labor and their families. Organized activities emphasized on health and lifestyle promotion, education for children of the labor in the marine food industry and promotion of learning skill development in early childhood through donation of learning kits to schools where those children are studying.

6. Organizing seminars to inform and update the members of newly announced rules and regulations periodically.

The Association has attached herewith relevant document and information on the activities carried out in 2010 (January - May) in accordance with the abovementioned for your consideration.

With kind regards,

Yours faithfully,

  
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(Panisaun Jarnarnwej, Ph.D.)  
President, the Thai Frozen Foods Association



Ref. No. Ror Ngor 0507/003797

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Emblem**

Department of Labour Protection  
and Welfare  
Mitramitree Road, Din Daeng,  
Bangkok 10400

10 May 2010

**Subject:** Information on the Inspection of Establishment with Exploitation of Child Labour under 15 years of age

**Attention:** President  
Thai Frozen Foods Association

**Reference:** Letter of the Thai Frozen Foods Association ref. no. Por Or 018/2553 dated February 17, 2010

Reference is made to the above letter of the Thai Frozen Food Association requesting a list of establishment found with the exploitation of child labour under 15 years of age as reported in the joint meeting on November 23, 2009 so that the Association would further proceed with any establishment found guilty of child labour abuse in accordance to the rules and regulations set forth by the Association.

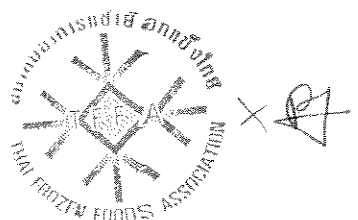
The Department of Labour Protection and Welfare has examined the data from the recent labour inspection and found no exploitation of child labour under 15 years of age in the fish, shrimp and seashell product process as well as other marine food products.

With kind regards,

Yours faithfully,

(Signed)

(Somchai Wongthong)  
Deputy Director-General  
On behalf of Director-General  
Department of Labour Protection and Welfare



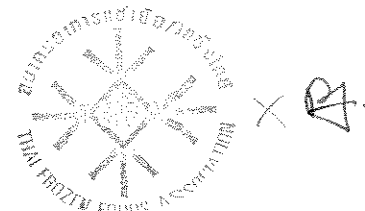
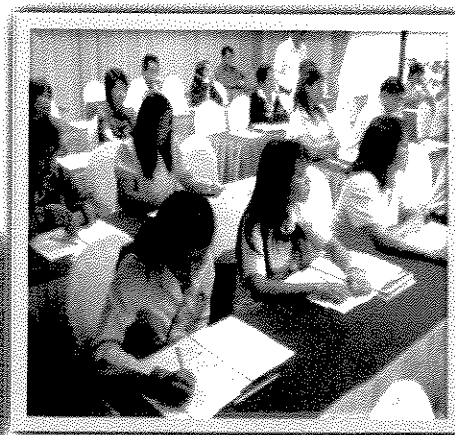


# Plan to Protection of Child/Force Labour in 2010

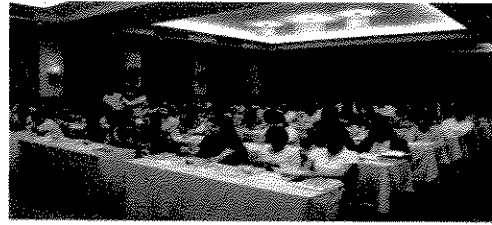
By Thai Frozen Foods Association, Thailand

June 14, 2010

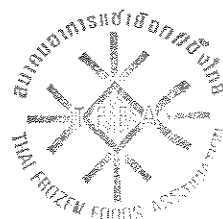
Seminar on "Labour Protection Laws 2008"  
by the Department of Labour Protection and Welfare



Seminar on "Human Trafficking Prevention and Suppression Act B.E.2551 (2008)" by the Immigration Bureau and the Department of Employment, Ministry of Labour at Samutsakorn Province

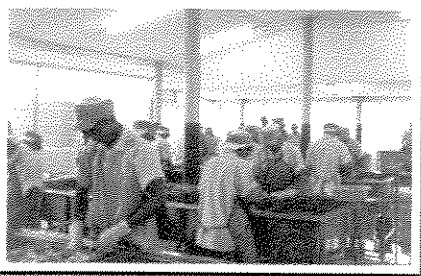
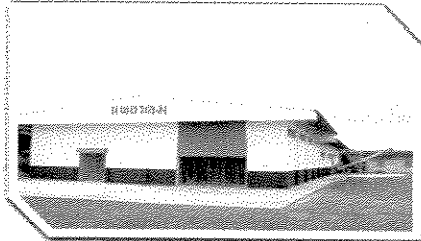


Seminar on "Thai Labour Management: How to Align with Importing Countries" by the Department of Labour Protection and Welfare, Ministry of Labour at JB Hotel, Songkla Province

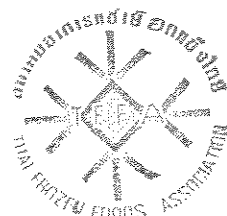


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**Good Manufacturing Practice (GMP) System Monitoring for Food Production Process in Primary Marine Food Processing Plant (Peeling Shed) by TFFA**



**The Observation and Monitoring of the Employment of Foreign Labour in Member Plants and Primary Marine Food Processing Plant (Peelingshed) by the TFFA and Representatives from Immigration and Customs Enforcement (ICE)**



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Seminar on "US Policy on Exploitative Labour" and "Experience on Human Trafficking in Forms of Labour Exploitation and Remedies for Victims of Human Trafficking" by Mr. Lawrence J. Petroni, First Secretary, US Embassy Bangkok and Mr. Sompong Srakaew, Labour Right Promotion Network Foundation on June 2010



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