



Narasell Pty Ltd Business Name June Prime Lamb

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Modern Slavery Statement 2020

Introduction

Narasell Pty Ltd as Trustee for the Heath Newton Family Trust operates under the registered business name of June Prime Lamb (JPL).

This is the first Modern Slavery Statement for June Prime Lamb. The purpose of this statement is to outline our approach to ensuring we have appropriate processes in place to mitigate the risk of modern slavery in our operations and supply chain.

Modern slavery is a systemic, global issue. In this statement we refer to “modern slavery” as an umbrella term, capturing the many and complex crimes, including all forms of human trafficking, forced labour, debt bondage, other slavery and slavery like practices, and the worst types of child labour. While child labour takes many different forms, some forms are considered the worst forms of child labour because of the increased risks of slavery, trafficking, illicit activities and likely harm to their health, safety and morals.

June Prime Lamb promotes and respects human rights as outlined in the Universal Declaration of Human Rights and the UN Sustainable Development Goals and The Australian Modern Slavery Act 2018 has been the catalyst to review and strengthen our strategy and identify opportunities to partner with our suppliers, customers and other stakeholders, on the eradication of modern slavery.

Structure, Operations and Supply Chain

JPL primarily operates a sheep meat processing facility located near the regional township of June in southern NSW. Additionally, JPL operates a farming enterprise located near Narrandera in southern NSW and a meat wholesale operation in north western Sydney. The farming operation is focussed on cropping and livestock activities.

JPL supplies product to the domestic market including supermarket chains, restaurant wholesalers and butcher shops, located both regionally and in metropolitan areas, and also to export destinations including China, Korea, Canada and USA. Additionally, JPL provides a processing service to a large Australian supermarket chain.

The key elements of the supply chain include:

1. Supply of livestock.
2. Employment and labour.
3. Freight by road and ship.
4. Packaging material (cardboard boxes and cryovac material).
5. Fodder and additives
6. Electricity, gas and water.

Risks of Modern Slavery Practices in the Supply Chain

Potential risks of modern slavery practices in the supply chain include:

1. Origination of livestock – labour on livestock farms.
2. Recruitment and sourcing of labour in the operations.

Assessment and Address of Risks

1. Origination of livestock – labour on livestock farms.

The International Labour Organisation ranks agriculture as having the fourth highest number of confirmed forced labour cases out of all industries. Workers within the agriculture industry are highly vulnerable to modern slavery because of the nature of the work involved in production, processing, packaging and transport of food.

The definition of modern slavery also includes the worst forms of child labour. Examples of the worst forms of child labour include children working with dangerous tools and equipment or with chemical substances (e.g. pesticides for crops), not having appropriate safety equipment to keep them protected or being forced to work in extreme conditions. In many countries around the world, the risk of child labour is also particularly present in agriculture, with 60% of all child labourers in the age group 5-17 years working in agriculture. This is driven by poverty, limited or no access to education and inadequate agricultural technology.

June Prime Lamb's livestock is sourced from local regionally based Australian growers of livestock. Typically, these operations are not labour intensive and are not considered high risk. Additionally, approximately 97% of livestock is sourced from local council managed livestock selling centres and through registered livestock agents. As a result, our assessment indicates that there is a low risk of modern slavery (including child labour) in this portion of the supply chain.

Despite these factors, JPL acknowledges the potential for such practices to exist in Australia.

2. Recruitment and sourcing of labour in the operations.

As at 30th June 2020 JPL directly employed 266 personnel, 20 full-time personnel contracted through labour hire companies and 4 apprentices contracted through NSW Registered Group Training Organisations.

Of the directly employed personnel, 102 were Australian residents. Of these 11 were female and 91 male. Of the females 2 were employed on a part time basis and 3 were employed on a casual basis. Of the males, 3 were employed on a casual basis.

Of the directly employed personnel, 43 were foreign workers recruited as full-time workers under the Business Long Stay visa scheme. Of these 2 were female and 41 male.

Of the directly employed personnel, 121 were recruited foreign workers employed on a casual basis due to visa conditions and high turnover rates. Of these, 36 were female and 85 male.

Of the 20 personnel employed through labour hire companies:

- a. 15 were engaged through a company registered under the Labour Hire Licensing Act 2017 and the employees were sourced with reference to the Pacific Labour Scheme and originated in Fiji. The labour hire company arranges accommodation for these personnel.
- b. 4 were engaged through a registered private Australian company.
- c. 1 was engaged by a company authorised on an Australian Government Special Program Agreement to assist disadvantaged indigenous youths living in disadvantaged conditions.

Of the 4 apprentices, all were contracted through NSW Registered Group Training Organisations.

Based on the above analysis the key risk area appeared to be in relation to:

1. The 121 recruited foreign workers employed on a casual basis. Potential areas of concern would be inappropriate recruitment practices and legitimacy to work in Australia. As the personnel are directly employed and remunerated by JPL there is no concern regarding payment efficacy.

JPL will initiate a process of independently verifying the visa status of each employee to independently confirm the legitimacy to work in Australia. JPL will engage with the recruitment consultant to ensure that appropriate practices are in place.

2. With regard to the labour hire personnel JPL will establish procedures to check:
 - a. that personnel have been appropriately recruited.
 - b. that personnel are being correctly remunerated.
 - c. that personnel are not being excessively charged for accommodation and / or other costs.
 - d. that personnel are being accommodated in appropriate facilities.

Remediation Processes:

Should any breach, or potential breach, of the Modern Slavery principles be identified the issue will be addressed immediately with the relevant party. An appropriate period of time will be allocated in which the issue must be addressed, and the impacted party compensated if required. The offending party will receive written notice of the issue and will be advised that if the matter is not corrected within an acceptable period then contractual arrangements will be terminated. The offending party will also receive written notice that any repeat of the breach will result in immediate termination of contract. JPL will require proof that the issue has been appropriately addressed and will conduct audits to ensure there are no repeated incidents.

The effectiveness of such actions will be assessed by requiring further regular review of documentation to prove that breaches do not recur.

Modern Slavery Statement Approval:

This Modern Slavery Statement is approved by the principal governing body of Narasell Pty Ltd being Mr Heath Newton, Sole Director. The statement is approved on 29th March 2021 and is signed, below, by the sole managing director.



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Heath Newton
Sole Director
Narasell Pty Ltd
29/03/21